

APPLICATION FOR LISTED BUILDING CONSENT OFFICER DELGATED REPORT

APPLICATION REFERENCE:	PL/2026/00130
APPLICATION TYPE:	Listed building consent (Alt/Ext)
SITE ADDRESS:	Whatley Manor Hotel and Spa, Twatley, Malmesbury, SN16 0RB
DESCRIPTION OF WORKS:	Internal alterations and refurbishment of 21st century spa area
RECOMMENDATION:	Approve

SITE DESCRIPTION/CONTEXT

Whatley Manor formerly listed at Twatley Manor a Country House now Hotel and Spa. It is based around an 18th century farmhouse core with extensive alterations and additions between 1920 and 1927 by Septimus Warwick Architect. The original range is coursed rubble with squared rubble and flush dressed stone quoins to the 20th century section and stone slate roof and stone stacks.

The windows are scattered and mostly 2 -3 light leaded timber casements and stone mullioned casements with leaded lights to the 20th century ranges some in square and canted bays.

The building has a U-shaped plan with the 18th century range to left hand and additions to the right. The 18th century range is 2 storeys with 4 bays with hipped dormers and 20th century windows.

The interior has 2 drawings rooms of fine quality panelling and Palladian style doorcases and staircase with wreathed newel ramped handrail and carved balusters and tread ends all from 1920's and includes some reused Jacobean panels.

A modern Spa extension was added about 20 years ago to a former orchard area. A contemporary building with green roof and extensive curving roof glazing. The Spa building is attached to the east wing of the Manor House.

The property is located to open countryside about 100 m north of the River Avon and 400m south of the B4040 1.5km east of Easton Grey Church and 3km west of Malmesbury.

PROPOSAL

Internal alterations and refurbishment of 21st century spa area.

RELEVANT PLANNING HISTORY

Proposal / Summary
N/02/02717/LBDC - Listed building consent Decision - Approve with Conditions Date: 13/1/2003 – DISCHARGE OF CONDITIONS (2)(3) AND (4) OF 01.01086.LBC - MATERIALS, STONEMASONRY AND EXTERNAL JOINERY
N/01/02710/LBC - Listed building consent Decision - Approve with Conditions Date: 7/1/2002 – REPLACE RECEPTION HALL FLOOR IN NATURAL LIMESTONE FLAGS

N/02/01671/LBC - Listed building consent Decision - Approve with Conditions Date: 10/9/2002 – ERECTION OF GARDENER'S STORE AND STAFF ROOM BUILDINGS/WALLED AND FENCED CHILLER AND SUBSTATION ENCLOSURE/REVISED GLAZED LINK AND AMALGAMATE ROOMS 24 AND 25
N/02/02691/LBDC - Listed building consent Decision - Approve with Conditions Date: 13/1/2003 – DISCHARGE OF CONDITION 2 (1-8) OF 02.01671.LBC - ERECTION OF GARDENERS STORE AND STAFF ROOM - WINDOW DETAIL/STONEWORK/FENCING
N/11/00363/PENQ - Pre-Application enquiry – Erection of Garden Shed
N/02/01670/FUL - Full planning permission Decision - Approve with Conditions Date: 10/9/2002 – ERECTION OF GARDENER'S STORE AND STAFF ROOM BUILDINGS/WALLED AND FENCED CHILLER AND SUBSTATION ENCLOSURE/LAYING OUT OF CAR PARKING/REVISED GLAZED LINK AND AMALGAMATE ROOMS 24 AND 25
N/01/00675/FUL - Full planning permission Decision - Approve with Conditions Date: 30/4/2001 – ERECTION OF TWO GREENHOUSES
N/88/03527/LBC - Listed building consent Decision - Approved Date: 8/3/1989 – EXTENSION TO LISTED BUILDING
N/88/03526/FUL - Full planning permission Decision - Approved Date: 8/3/1989 – PROPOSED EXTENSION TO CREATE 3 NEW BEDROOMS WITH CONFERENCE ROOM
N/12/00387/FUL - Full planning permission Decision - Approve with Conditions Date: 4/4/2012 – Replacing an Existing Sewage Treatment Plant
N/99/02190/COU - Full planning permission Decision - Unknown Date: 29/10/1999 – CHANGE OF USE FROM HOTEL TO PRIVATE DWELLING
N/93/00148/FUL - Full planning permission Decision - Approved Date: 17/3/1993 – IMPROVEMENTS TO EXISTING SEWAGE TREATMENT FACILITIES - REED BED SEWAGE TREATMENT FACILITIES
N/01/01086/LBC - Listed building consent Decision - Approve with Conditions Date: 19/9/2001 – EXTERNAL/INTERNAL ALTERATIONS, EXTENSIONS/ALTERATIONS TO BOUNDARY WALLS/ACCESS ENTRANCE
N/01/01085/FUL - Full planning permission Decision - Approve with Conditions Date: 19/9/2001 – EXTERNAL ALTERATIONS INCLUDING EXTENSIONS TO PROVIDE LEISURE SPA, ALTERATIONS TO WALLS/ACCESS ENTRANCE/ASSOCIATED LANDSCAPING/CAR PARKING
N/11/03673/FUL - Full planning permission Decision - Approve with Conditions Date: 4/4/2012 – Erection of Garden Shed
14/08123/LBC - Listed building consent Decision - Approve with Conditions Date: 14/10/2014 – Structural Repairs of Roof Structures of Bedroom 1 & Tudor Link
17/03718/PREAPP - Pre-Application enquiry – Refurbishment of Brasserie- Listed Building Advice
20/00744/FUL - Full planning permission Decision - Approve with Conditions Date: 20/5/2020 – Installation of new plantroom lift to serve swimming pool treatment plant.
18/00966/LBC - Listed building consent Decision - Approve with Conditions Date: 12/4/2018 – Replacement of entrance doors to restaurant with new, glazed doors

20/03024/FUL - Full planning permission Decision - Approve with Conditions Date: 8/6/2020 – Installation of biomass boiler to serve Whatley Barn (retrospective)
20/07205/DOC - Approval of details reserved by a condition Decision - Approved Date: 16/11/2020 – Discharge of conditions 2, 3 and 4 of 20/03024/FUL
17/12220/LBC - Listed building consent – Replacement of solid timber panelled entrance doors to greys restaurant & the bar (situated within C21 extension to the Listed Building) with new glazed doors.
20/01482/LBC - Listed building consent Decision - Approve with Conditions Date: 20/5/2020 – Installation of new plantroom lift to serve swimming pool treatment plant.
19/09604/DOC - Approval of details reserved by a condition Decision - Approved Date: 24/10/2019 – Discharge of condition 3, application ref 19/03981/FUL.
ENQ/2024/00037 - Pre-Application enquiry Decision - Pre-App Response Date: 8/4/2024 – INTERNAL WORKS TO LISTED BUILDING
17/02713/FUL - Full planning permission Decision - Approve with Conditions Date: 14/6/2017 – Two storey extension to existing dwelling
19/03981/FUL - Full planning permission Decision - Approve with Conditions Date: 17/7/2019 – Retrospective application for installation of new, external, Biomass Boiler to serve Whatley Barn
N/04/01835/LBDC - Listed building consent Decision - Approved Date: 17/8/2004 – DISCHARGE OF CONDITIONS IN RESPECT OF 03.00611.LBC - DETAILS
N/11/02428/LBC - Listed building consent Decision - Approve with Conditions Date: 29/9/2011 – Conversion of Redundant Forge/Lighting House/Water Tower to 1 no Dwelling (Amendment to 03/00611/LBC)
PL/2024/04814 - Listed building consent (Alt/Ext) Decision - Approve Date: 19/7/2024 – Internal alteration to the dining room, including removal of a pier
PL/2026/00130 - Listed building consent (Alt/Ext) – Internal alterations and refurbishment of 21st century spa area

RELEVANT LEGISLATION, POLICIES AND GUIDANCE

Legislation

From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Section 16 requires that **special regard** be given to the desirability of preserving listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 also requires the Council to pay special attention to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.

National Policy and Guidance

The National Planning Policy Framework (NPPF) sets out government policy, including in respect of the historic environment.

Section 16 of the NPPF ('Conserving and enhancing the historic environment') sets out the Government's high-level policies concerning heritage and sustainable development.

Paragraphs 213-215 of the NPPF require a balanced approach with any harm which would be caused being weighed against the potential public benefits which might be achieved. Paragraph 210 requires local planning authorities to take account of the desirability of sustaining and enhancing the significance of heritage assets and of new development making a positive contribution to local character and distinctiveness.

Section 14 of the NPPF addresses the challenge of climate change, flooding and coastal change.

Paragraph 167 advises that "Local planning authorities should also give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights).

National Planning Practice Guidance provides guidance on interpreting the NPPF.

Historic England Advice Note 2: Making changes to Heritage Assets, illustrates the application of policies set out in the NPPF in determining applications for LBC (and planning permission).

Historic England Advice Note 18: Adapting Historic Buildings for Energy and Carbon Efficiency, provides advice in support of consistent decision making on approaches to improve the energy efficiency and support carbon reduction of historic buildings, whilst conserving their significance.

Wiltshire Core Strategy:

Whilst not directly relevant to listed building consent applications, the below policies give an indication of the Council's approach to development affecting heritage assets:

- Core Policy 57 'Ensuring high quality design and place shaping': A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality.
- Core Policy 58 'Ensuring the conservation of the historic environment' requires that "designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance."

ISSUES

Impact upon the preservation of the listed building or its setting or any features of special architectural and/or historic interest.

CONSULTATION RESPONSES

N/A

REPRESENTATIONS

In accordance with the requirements of Section 5(3)(a) of the Planning (Listed Buildings and Conservation Areas) Regulations 1990 (as amended) publicity is not required for listed building consent to carry out works affecting only the interior of a Grade II (unstarred) listed building.

ASSESSMENT

In accordance with Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990, special regard has been given to the significance of the listed building, including its architectural and historic interest, and the desirability of preserving both the building and its setting. Relevant policies within the National Planning Policy Framework (NPPF), particularly Section 16: Conserving and Enhancing the Historic Environment, have also been taken into account. These policies require that any harm to the significance of a designated heritage asset must be clearly justified and weighed against the public benefits of the proposal.

In order to be acceptable, the application needs to be assessed against the following criteria:

Information considered/submitted

Paragraph 207 requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting. This should include sufficient information to provide a clear understanding of the significance of the heritage asset and its setting and the potential impact of any proposals on that significance.

The application includes Design and Access Heritage Statement, Site and Location Block Plan, Existing and Proposed Spa Basement and Ground Floor Plans and Mechanical, Electrical and Plumbing (MEP) Services Plan.

Assessment of significance:

According to the National Planning Policy Framework (NPPF), significance is defined as:

“The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”

In this case significance comes from its combination of vernacular country house and architectural extension and alterations of the 1920’s, its form, layout and architectural expression/detailing and use of local design and brick walling have significant historic and architectural interest. Its isolated location orientated south toward the River Avon about 100 m to the south and the associated farm buildings separately listed add a positive contribution to the setting of the listed building.

The modern Spa extension is attached to the listed building and is of good contemporary architecture with quality materials and finishes. It is an honest and respectful addition that has a neutral impact on the significance of the listed building and its setting while contributing to the economic viability of the Hotel and Spa.

Impact of proposals on the significance and setting of the building/structure:

Understanding the impact of proposed works on a listed building requires a careful and proportionate assessment of how those changes affect the asset’s heritage significance and its setting. This includes both the physical alterations to the building itself and any changes to its spatial or visual relationship with surrounding structures or spaces.

The significance of a heritage asset is not static; it is shaped by its architectural, historic, and communal values, and by how these are experienced in context. Therefore, any intervention must be considered in light of the asset's identified significance, with attention given to both potential harm and benefits. Benefits may include repairs that support the long-term conservation of the building, improved energy performance, or enhanced public access and understanding.

This assessment is grounded in the statutory duty under Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires special regard to be given to the desirability of preserving the building and its features of special interest. It is also informed by national policy, particularly paragraphs 199–208 of the National Planning Policy Framework (NPPF), and relevant local heritage policies and guidance.

The Whatley Manor is based on an 18th century farmhouse core with architect designed extensive additions and alterations between 1920 – 27. The early 20th interior has 2 drawings rooms of fine quality panelling and Palladian style doorcases and staircase with wreathed newel ramped handrail and carved balusters and tread ends and includes some reused Jacobean panels.

The older farmhouse is built in coursed rubble stone with squared rubble and flush dressed stone quoins to the 1920's additions both with stone slate roofs and stone stacks. The 18th century building is a U-shaped plan to the left-hand side with the early 20th century addition to the right. There is a gabled section that forms the wing to the left of the 18th century farmhouse, and the modern Spa building is attached to this side (east) elevation.

The existing Spa offers a high-quality Spa experience with Thermal Baths, Tepidarium, Treatment Suites, Hydrotherapy Pool and Spa Lounge. The building is based on concrete columns and beams supporting reinforced concrete slabs creating open spans. These are then infilled with thermal cabins. These are supplied prefinished and installed between the columns with curving stud walls linking between the cabins creating an organic shaped space. There is a small plantroom to serve the cabins.

The current cabins are 20 years old and reaching the end of their useful life and some of the treatments have evolved.

The proposal is for the replacement of the thermal cabins with new cabins with associated M& E and drainage services and new limestone and plaster finishes. Reinstatement of the organic corridor between the cabins and minor alterations to layouts of small treatment rooms to the edge of the building.

The proposal is limited to the modern Spa Building and will have a neutral impact on the historic or architectural fabric of interest in the main Hotel.

CONCLUSION

The NPPF confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It makes clear that any harm to a designated heritage asset requires clear and convincing justification.

The overall impact of the proposals are limited to the modern Spa Building and will have no impact on significance of the heritage assets. On this basis no specific justification is required however it is considered the works will assist in securing the future use of the functioning and visibility to support the heritage asset in support of its long-term conservation. The requirements of current conservation legislation, policy or guidance are considered to be met.

RECOMMENDATION:

That Listed Building Consent be GRANTED, subject to the standard 3 year and plan list conditions: