

APPLICATION FOR LISTED BUILDING CONSENT OFFICER DELGATED REPORT

APPLICATION REFERENCE:	PL/2026/03072
APPLICATION TYPE:	Listed building consent
SITE ADDRESS:	Whatley Manor Hotel and Spa, Twatley, Malmesbury, SN16 0RB
DESCRIPTION OF WORKS:	Removal of the existing, dysfunctional, air handling units and replacement with new air handling units of the same air flow volume requirements and serving same areas.
RECOMMENDATION:	Approve with Conditions

SITE DESCRIPTION/CONTEXT

Whatley Manor is a Country House now operating as a Hotel and Spa with extensive grounds.

The list entry, for means of identification purposes only, provides the following description;

BROKENBOROUGH SHERSTON ROAD, Easton Grey ST 88 NE (south side) 3/10

Whatley Manor (formerly listed as Twatley Manor) 12.12.51 II Former Country House, now Hotel. C18 farmhouse core with extensive alterations and additions of 1920-7 by Septimus Warwick of London. Coursed rubble to early range, squared rubble and flush dressed stone quoins to C20 section. Wooden lintels, stone dressings to windows, stone slate roofs and stone stacks. Irregular U-shaped plan with C18 range to left-hand and additions to the right. North entrance front of 2 storeys with attics to early range and 2 projecting gabled sections, that to left-hand with half hip to gable apex. Scattered fenestration: 2 and 3-light leaded wooden casements and stone-mullioned casements with leaded lights to C20 ranges, some in square and canted bays. Bull's-eye windows to attic in later additions. South front reveals 2 storey 4 bay C18 range with 4 hipped dormers and C20 fenestration. Two fine bracketed C20 hoods to doors on west facade. Interior. 2 drawing rooms of very fine quality panelling and Palladian style doorcases, all 1920-7. Some original reset Jacobean panels. Elegant Palladian style staircase with wreathed newel, ramped handrail, carved balusters and tread-ends, also of 1920-7.

Listing NGR: ST8971087216

A modern Spa extension was added approximately 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. Listed building consent ref PL/2026/00130 was granted 23/3/2026 for Internal alterations and refurbishment of 21st century spa area. It is understood that those works will be undertaken at the same time as the replacement AHUs will be installed.

The property is located within the Cotswolds National Landscape 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 Malmsbury.

PROPOSAL

The proposal seeks listed building consent for the removal of 5No existing AHUs and their replacement with 4No new AHUs along with a new ventilator and duct fan within sound insulating casing. Externally, the 3No cowls will appear similar to the existing however some will be orientated slightly differently.

To facilitate the removal of the existing AHUs and their replacement, the basement level of the service shaft is to be temporarily removed then reinstated.

RELEVANT PLANNING HISTORY

Proposal / Summary
14/08123/LBC - Listed building consent Decision - Approve with Conditions Date: 14/10/2014 – Structural Repairs of Roof Structures of Bedroom 1 & Tudor Link
18/00966/LBC - Listed building consent Decision - Approve with Conditions Date: 12/4/2018 – Replacement of entrance doors to restaurant with new, glazed doors
20/00744/FUL - Full planning permission Decision - Approve with Conditions Date: 20/5/2020 – Installation of new plantroom lift to serve swimming pool treatment plant.
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.
ENQ/2024/00037 - Pre-Application enquiry Decision - Pre-App Response Date: 8/4/2024 – INTERNAL WORKS TO LISTED BUILDING
ENQ/2026/00812 - Pre-Application enquiry – Proposed replacement of some of the single glazed metal framed window panes within the Listed Building with metal framed window panes with slim line double glazing. The window frames and pattern within the leaded lights would remain the same.
N/01/00675/FUL - Full planning permission Decision - Approve with Conditions Date: 30/4/2001 – ERECTION OF TWO GREENHOUSES
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/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/01/02710/LBC - Listed building consent Decision - Approve with Conditions Date: 7/1/2002 – REPLACE RECEPTION HALL FLOOR IN NATURAL LIMESTONE FLAGS
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/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/STONWORK/FENCING
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, STONWORK AND EXTERNAL JOINERY
N/88/03526/FUL - Full planning permission Decision - Approved Date: 8/3/1989 – PROPOSED EXTENSION TO CREATE 3 NEW BEDROOMS WITH CONFERENCEROOM
N/88/03527/LBC - Listed building consent Decision - Approved Date: 8/3/1989 – EXTENSION TO LISTED BUILDING
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/99/02190/COU - Full planning permission Decision - Unknown Date: 29/10/1999 – CHANGE OF USE FROM HOTEL TO PRIVATE DWELLING
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) Decision - Approve Date: 23/3/2026 – Internal alterations and refurbishment of 21st century spa area
PL/2026/02812 - Full planning permission – Removal of the existing, dysfunctional, air handling units and replacement with new air handling units of the same air flow volume requirements and serving same areas.
PL/2026/03072 - Listed building consent (Alt/Ext) – Removal of the existing, dysfunctional, air handling units and replacement with new air handling units of the same air flow volume requirements and serving same areas.

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

Conservation Officer: No comments received

REPRESENTATIONS

In accordance with the requirements of Section 5(1) of the Planning (Listed Buildings and Conservation Areas) Regulations 1990 (as amended) the application for listed building consent was publicised by way of:

- A site notice displayed near the site;
- An advertisement placed in the local press.

These methods were used to inform interested parties and to allow a statutory consultation period of **21 days** for representations to be submitted.

Below is a summary of the representations received during the consultation period. In accordance with the provisions of the *Planning (Listed Buildings and Conservation Areas) Act 1990*, only matters relevant to the consideration of the building's special architectural or historic interest have been taken into account in the assessment of this Listed Building Consent application.

None received

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.

In this instance a full suite of plans was submitted including a location, block, floorplans, elevations and sections, ductwork layout, design access and heritage statement and planning noise assessment.

Paragraph 208 also provides for the local planning authority to make its own assessment of impact and the following heritage recommendations are offered on this basis.

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.”

Historic England further categorises significance into four key values:

- *Evidential* – the potential of the asset to yield evidence about past human activity.
- *Historic* – the ways in which the asset illustrates aspects of history.
- *Aesthetic* – the sensory and design qualities of the asset.
- *Communal* – the meanings and associations attached to the asset by people.

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.

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 212-221 of the National Planning Policy Framework (NPPF), and relevant local heritage policies and guidance.

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 proposal is for the replacement of the existing AHUs within the plant room and the installation of 4No new units with associated ducting. The existing cowls will be replaced and reorientated externally with the remainder of the works internal. To facilitate the works the basement level of the service shaft will be removed then reinstated.

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. Due to the works being predominantly internal and full details having been provided, no further information is required.

Impact on Ecology

While Sections 16 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 do not explicitly reference protected species, Local Planning Authorities have a statutory duty to consider potential impacts on protected species when determining applications. This responsibility arises from broader environmental legislation and national planning policy, and must be taken into account where relevant.

		Y / N / NA
(a)	Does the site or proposed development possess/impact on any of the features where protected species are likely to be present (assessed against Natural England's standing advice) and where species are likely to be found?	N
(b)	If yes, has a protected species survey been submitted?	n/a
(c)	If yes, does the survey show a detailed consideration of ecological impacts, wildlife mitigation and the creation, restoration and enhancement of wildlife corridors to preserve and enhance biodiversity in accordance with the standing advice?	n/a

Comments (if any):

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 following conditions:

1) The works for which Listed Building Consent is hereby granted shall be begun before the expiration of three years from the date of this consent.

REASON: To comply with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2) The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

1957.21-000: Location Plan

1957.21-AHU-BP: Block Plan

1957.21-AHU-Design and Access Statement (Including photographs PH01-PH04 and technical details of AHU)

1957.21-AHU-EX-01: Existing basement plan and existing external area ground floor plan

1957.21-AHU-EX-02: Existing elevations from points A & B

1957.21-AHU-EX-03: Existing section A-A and section B-B

1957.21-AHU-PR-01: Proposed basement plan and proposed external area ground floor plan

1957.21-AHU-PR-02: Proposed elevations from view points A & B

1957.21-AHU-PR-03: Proposed section A-A and section B-B

1957.21-AHU-Scheme 01: Works for replacement of air handling units

4929-E3C-AHU-B0-D-Z-9010 by E3: AHU and External Ductwork Layout

A2440 R01: Whatley Manor Hotel AHU Planning Noise Assessment

Received 13.05.26

REASON: For the avoidance of doubt and in the interests of proper planning.