

HERITAGE TECHNICAL NOTE

Site Address:	Master's Lodge, Marlborough College, Bath Road, Marlborough, Wiltshire, SN8 1PA
Stantec Job No:	333102056
Note No:	1.0
Date:	July 2026
Prepared By:	Emily Taylor, Associate Heritage Planner (MCIfA)
Subject:	S96A and S19 Application – Heritage Technical Note

1. Introduction

1.1. This heritage technical note has been prepared to inform the following applications for the Grade II Listed Master's Lodge at Marlborough College, Bath Road, Marlborough, Wiltshire (hereafter the Site):

- A Section 19 (S19) Application for Listed Building Consent (LBC) application PL/2025/05149; and
- A Section 96A (S96A) Non-Material Amendment for planning application PL/2025/05078.

1.2. The applications were validated in June 2025 by Wiltshire Council, hereafter the Local Planning Authority (LPA), and granted in November 2025. The applications were for the:

Change of Use of the Master's Lodge (Grade II listed) to ancillary educational facility, including internal alterations to facilitate use as a day house for pupils, with associated refurbishment works.

1.3. In March 2026, a Discharge of Condition (DoC) application was approved by the LPA for Condition 3 (External Materials) relating to PL/2025/05149.

1.4. The forthcoming variation applications seek to:

- Amend the approved plans specified in PL/2025/05078;
- Alter the proposals approved under PL/2025/05149. The alterations relate predominately to internal works; and
- Seek retrospective approval for works undertaken not specified in PL/2025/05149

1.5. The amendments and alterations focus specifically on Master's Lodge, the principal building in the Site.

2. Intention and Context

2.1. The purpose of this technical note is to review the feasibility and suitability of the variations presented and provide an impact assessment to inform determination. The intention of this note is not to consider previous granted proposals or repeat the information previously submitted as part of the granted applications, but rather make reference to, where appropriate, relevant information previously submitted to enable cross reference.

2.2. This technical note should be read in conjunction with the wider variation application package presented, including the architecture drawings and accompanying planning statement.

2.3. To inform the works proposed at the Site, heritage advice and support has been sought by Marlborough College (hereafter the Applicant) throughout the process. This has culminated in:

- Delivery of a Historic Environment Desk-Based Assessment (HEDBA) by Stantec in 2025;

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- Engagement and consultation with the LPA throughout the planning process;
- Delivery of a Written Scheme of Investigation (WSI), for a programme of Historic Building Recording, by Stantec in 2025;
- Part completion of the programme of Historic Building Recording, with outstanding elements comprising monitoring of the removal of the roof lantern; and
- Technical advice and review of proposals (approved and forthcoming) and material submitted for DoC to ensure compliance with policy and guidance and appropriateness within the Site to mitigate and minimise harm.

3. Site Summary

- 3.1. The Site forms part of Marlborough College, a private boarding school for pupils aged 13 to 18, in the market town of Marlborough in Wiltshire. The Site (Grid Reference SU 18554 68692) comprises two buildings: Master's Lodge, a mid-19th century Grade II Listed (National Heritage List for England (NHLE): 1259063) former headmaster's accommodation, and Old Bursary. Both buildings, as part of the approved applications, are being converted to provide day pupil facilities. The Site lies within Marlborough College Registered Park and Garden (Grade II; NHLE: 1001239) and Marlborough Conservation Area.
- 3.2. The Site is a heritage asset of high significance, deriving from its historic, architectural, aesthetic, archaeological and communal interest. Its significance lies in its association with the development of Marlborough College and the town, its mid-19th century design and surviving historic fabric, its relationship with its grounds and the wider college landscape, and its evidential interest for understanding earlier phases. Its setting contributes positively to that significance through its landscaped grounds, its relationship with surrounding college buildings, and its position within the wider Marlborough College campus, Registered Park and Garden, and Conservation Area. The significance of the Site and surrounding historic environment is detailed in full in the HEDBA¹.

4. Proposals and Impact Assessment

- 4.1. This section² outlines specifically the alterations and amendments proposed alongside providing commentary on the overall impact (Table 1). Works previously granted under the existing applications, and which are not subject to change, are excluded from the assessment below. Considering the proposed works, the first-floor fire strategy and door schedules have been updated to align with the amended layout. Work proposed to the staircases discussed in further detail below.
- 4.2. Retrospective consent is being sought to regularise the installed rooflights in Roof 7 (Table 1, Item 13). The rooflights were installed end June / early July 2026. Notwithstanding their installation in advance of consent, the works are limited to a later modern flat roof surface which is recessed in the building. The rooflights are not conservation rooflights; however, given their location within a recessed modern bitumen roof, limited external visibility, and functional requirement to project slightly above the roof plane to ensure a watertight installation, this is not considered to result in harm to historic fabric, the legibility of the loggia, or the heritage significance of the Listed Building. Photographs (**Photograph 1-3**) of the rooflights in situ are provided below.

¹ HEDBA Section 4.

² For ease, the information presented follows the template provided in the HEDBA under Section 5.5.

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Photograph 1. Installed Rooflights in Roof 7 (Table 1, Item 13)



Photograph 2. Installed Rooflights in Roof 7 (Table 1, Item 13)



Photograph 3. Location of Installed Rooflights in Roof 7 (Table 1, Item 13)

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Table 1. Proposals and Impact Assessment

Item	Floor Level Room Code ³	Drawing	Feature of Interest / Significance	Proposed Alteration / Amendment	Impact	Commentary
1	Ground Floor Proposed Use: LGF Sports Store ⁴	Proposed Ground Floor 241108-1411 P12 Proposed Roof Plan 241108-1414 P03 P04	External walls. Historic foundations and services.	Rooflights added to LGF sports store.	Negligible	Change proposed to permitted infill of courtyard for usable space. Rooflight would be located on a modern roof installation. Retention of / no impact to historic fabric of interest. Through design, the rooflight would be set into the roof. No appreciable visual intrusion. Rooflight would not be appreciable from the exterior of the building or in views directly onto the building. Any change in outward views from the upper windows on the northwest elevation would be limited to the presence of the rooflight within the context of the modern infill. The form and layout of the courtyard, including its boundary walls, would remain legible and unharmed.
2	Ground Floor Existing Use: G0.8 Office 2 Proposed Use: C.04 Corridor	Demolition - Ground Floor 241108-1261 P05 Proposed Ground Floor 241108-1411 P12	-	Existing column retained, with proposed wall infill	Low	Retention of existing fabric. Stud wall would have localised impact but would be reversible.
3	Ground Floor Proposed Use: G.17 Boys Changing Room	Proposed Ground Floor 241108-1411 P12	External fabric.	Addition of riser cupboard and boxing	Low	Localised and limited impact.
4	Ground Floor Proposed Use: C.02 Corridor	Proposed Ground Floor 241108-1411 P12	Staircase. Panelling. Door surround. Skirting board.	Removal of proposed riser cupboard	Negligible	Removal of granted change. No loss / impact to historic fabric.
5	Ground Floor Proposed Use: C.05 Corridor	Proposed Ground Floor 241108-1411 P12	Sash windows. Fanlight. Built in cupboards. External door and surround.	Removal of proposed secondary glazing	Negligible	Removal of granted change. No loss / impact to historic fabric.

³ As illustrated on the associated drawing provided.

⁴ No room code – corridor off G.14 A and G.16 B.

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Item	Floor Level Room Code ³	Drawing	Feature of Interest / Significance	Proposed Alteration / Amendment	Impact	Commentary
6	Ground Floor – Second Floor Proposed Use: C0.2, C.10 & C.20 Corridor	Existing and Proposed Stair Section 1-1 241108- 1570 Existing and Proposed Stair Section 2-2 241108- 1571 Proposed First Floor 241108- 1412 P07 Proposed Second Floor 241108- 1413 P06	Staircase. Panelling. Roof lantern. Sash window.	Staircase alterations (Staircase A)	Low / Intermediate.	Principle of insertion of staircase has previously been granted. Loss of historic fabric through installation, although existing lantern and ceiling may have resulted in loss of earlier historic fabric in this location. Loss of sash windows and fabric to create doorway openings. Principle of removal previously granted ⁵ . No surviving historic fixtures visible on the extant ceiling. Change to circulation, although significance and prominence of main stairwell retained. Not appreciable externally or beyond staircase. Retention of fabric - glazing ensure legibility and appreciation retained.
7	Ground Floor – Second Floor Proposed Use: C.11 & C.21 Corridor	Existing and Proposed Stair Section 3-3 241108- 1572 Proposed First Floor 241108- 1412 P07 Proposed Second Floor 241108- 1413 P0	Staircase	Staircase alterations (Staircase C)	Low	Localised impact with limited loss of fabric. Removal and replacement of existing fabric. Glazing ensures legibility and appreciation retained.
8	First Floor Proposed Use: C1.06 & C1.07 Small Laundry and Folding Room ⁶	Proposed First Floor 241108- 1412 P08	Sash window. Skirting boards. Built-in cupboard.	Function of rooms changed to laundry	Low	Change in function / use. Existing services and utilities are already present within these rooms, such that their reuse for laundry purposes would help minimise the need for new service runs and thereby limit potential impacts. Loss of modern fabric. Localised and limit impact through installation in an area historically impacted.

⁵ This is not a variation to the permitted plans, and the impact was addressed in the HEDBA in Section 5.

⁶ There are two laundry rooms on the first floor. The smaller room (Room C1.06) is proposed to contain a domestic washing machine and dryer with Room C1.07 a clothes folding room.

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Item	Floor Level Room Code ³	Drawing	Feature of Interest / Significance	Proposed Alteration / Amendment	Impact	Commentary
9	First Floor Proposed Use: C11 Corridor	Proposed First Floor 241108- 1412 P07	Staircase. Picture rail. Skirting boards	New door added to C.11 for fire separation	Low	Infill of existing opening. Localised and limited change. Circulation remains legible.
10	First Floor Existing Use: Room 1.11 Shower	Demolition - First Floor 241108- 1262 P05	-	Extent of demolition to shower enclosure clarified	Negligible	Additional information provided. Principle of function previously granted. Removal of modern fabric.
11	Roof Roof 1	Proposed Roof Plan 241108- 1414 P04	-	Access hatch into proposed bitumen roof	Negligible	The access hatch is proposed to an area of permitted change. Access hatch would be located on a modern roof installation. Retention of / no impact to historic fabric of interest. Through design, the access hatch would be set into the roof. No appreciable visual intrusion.
12	Roof Roof 4	Proposed First Floor 241108- 1412 P07 Proposed Roof Plan 241108- 1414 P04	External walls. Historic foundations and services.	Access hatch added to GF courtyard roof	Negligible	Change proposed to permitted infill of courtyard for usable space. Access hatch would be located on a modern roof installation. Retention of / no impact to historic fabric of interest. Through design, the access hatch would be set into the roof. No appreciable visual intrusion. The access hatch would not be appreciable from the exterior of the building or in views directly onto the building. Any change in outward views from the upper windows would be limited to the presence of the rooflight within the context of the modern infill. The form and layout of the courtyard, including its boundary walls, would remain legible and unharmful.
13	Roof Roof 7	Proposed Roof Plan 241108- 1414 P04	-	Two rooflights in the renewed bitumen roof.	Low	Retrospective approval is being sought as these rooflights have been installed. Retention of historic fabric and appearance.

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Item	Floor Level Room Code ³	Drawing	Feature of Interest / Significance	Proposed Alteration / Amendment	Impact	Commentary
						Localised and limited loss of fabric in a later modern addition. Through design, the rooflights⁷ are set into the roof. No appreciable visual intrusion. The rooflights are not appreciable from the exterior of the building or in views directly onto the building. Any change in outward views from the upper windows on the southeast elevation is limited to the presence of the rooflights within the context of the bitumen roof. This does not deviate from the legibility or appreciation of the loggia or setting of the building.

Staircase Proposals⁸

- 4.3. As part of the permitted applications, the extension of the existing principal staircase in the West Wing (Staircase A) was incorporated which required removal of the roof lantern to facilitate access. To minimise loss of any fabric which may survive, archaeological monitoring of the roof lantern removal was included as part of the Historic Building Recording.
- 4.4. Since consent was granted, the detailed design of the principal staircase has been further developed and is incorporated in the S19 application package. The staircase has been designed to respond sympathetically to the character and appearance of the existing stair, drawing on its proportions, materiality and detailing to ensure it sits comfortably within the historic interior. At the same time, the design maintains a clear distinction between historic fabric and the new intervention, such that the evolution of the building remains legible and the inserted staircase can be readily understood as a modern addition. Accordingly, the design proposed also presents a balanced and proportionate solution, developed to minimise harm to historic fabric and significance as far as possible, while also accommodating the structural requirements of the intervention and the need to achieve compliance with intended use / function and current Building Regulations.
- 4.5. Infill glazing is also proposed between the stair spindles in order to satisfy current safety and Building Regulations requirements. Whilst this introduces a new element to the stair, it is a light-touch, honest and visually recessive intervention that enables the form, detailing and appreciation of the staircase to remain clearly legible. The glazing would preserve views through the balustrade and avoid the heavier visual effect that could arise from more substantial alteration or replacement of the historic arrangement. As such, it represents a proportionate response to regulatory requirements, minimising impact on the character and heritage interests of the staircase and wider interior.

⁷ All rooflights proposed are conservation style.

⁸ Detailed descriptions of the staircases are provided in the accompanying HEDBA, Section 4.

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- 4.6. Staircase C, located in the East Wing, comprises a more secondary staircase, historically associated with the servants' quarters, and is of lower heritage interest. The handrail to Staircase C would be increased in height by 1000mm in order to provide appropriate for safety measures. This necessitates the replacement of the existing balustrade; however, these elements of a different type and character to the main staircase and therefore concluded to represent a later modern alteration / insertion rather than the original historic stair balusters. Their replacement would therefore not result in the loss of primary historic fabric. By contrast, the handrail and newel post appear older and more closely associated with the earlier form and character of the staircase, and these elements are proposed to be retained. The works therefore preserve the more significant surviving fabric, while allowing the staircase to be adapted for safe and compliant continued use. The introduction of replacement balusters as part of the handrail alterations would also assist in maintaining the legibility of the stair as an evolved feature, with the detailing able to signal the modern intervention whilst remaining visually sympathetic to the retained historic elements. Overall, the heritage impact of these changes is considered limited and proportionate, and further to this the existing character of the staircase has been preserved through record by the historic building recording.
- 4.7. Overall, the proposed staircase alterations reflect the need to balance the conservation of the Site with the practical requirements of its continued and viable use. In this instance, the design has been developed to retain and respect those elements of high heritage interest, while introducing carefully considered interventions where necessary to meet functional, structural and safety requirements. As such, the proposals represent a proportionate and sympathetic solution that supports the ongoing use of the Listed Building without causing significant harm.

5. Conclusions

- 5.1. Overall, the variations proposed do not alter Stantec's conclusions previously reached in respect of the Site in the HEDBA produced in 2025.
- 5.2. The amendments are limited in extent and principally relate to internal alterations, detailed design development, and minor changes to previously approved works. They have been designed to avoid or minimise additional impact on historic fabric and significance wherever possible, including through the reuse of existing serviced spaces, the retention of older and more significant staircase elements, the use of visually recessive glazing infills, and the careful siting of rooflights and access hatches within areas of modern alteration. Where change to historic fabric is required, this is localised, proportionate, and informed by an understanding of the relative heritage interests of that impacted upon.
- 5.3. Whilst the proposals continue to give rise to less than substantial harm to the significance of the Grade II Listed Building, the harm remains at the lower end of the spectrum and should be weighed against the public benefits of securing a viable and functional long-term use for the building as part of Marlborough College's educational provision. The harm also needs to be considered in the context of the heritage benefits of sustaining the building's ongoing conservation and supporting its continued contribution to the Registered Park and Garden and the Conservation Area.
- 5.4. The amendments and alterations are therefore considered to remain consistent with the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990 and with relevant national and local heritage policy⁹.

⁹ Detailed in full in the HEDBA.

DOCUMENT ISSUE RECORD

Technical Note No	Rev	Date	Prepared	Checked	Reviewed (Discipline Lead)	Approved (Project Director)
1.0		July 2026	ET	HS	JT	AJ

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