

DESIGN AND ACCESS STATEMENT

(INCLUDING HERITAGE STATEMENT)

FOR

REMOVAL OF THE EXISTING GAS BOILERS AND OUT OF DATE COOLING PLANT
AND REPLACEMENT WITH ELEVEN AIR SOURCE HEAT PUMPS

AT

WHATLEY MANOR HOTEL AND SPA, TWATLEY, MALMESBURY, SN16 0RB

1957.21-ASHP - D&A

28.08.26.– ISSUED PRELIMINARY FOR THE CLIENT'S COMMENT/APPROVAL

08.09.26.– ISSUED FOR PLANNING AND LISTED BUILDING CONSENT ONLY

INTRODUCTION

MLDE have been appointed by Mr Christian de Coulon of Whatley Manor Hotel and Spa to prepare the required documentation and submit an application for Planning Approval and Listed Building Consent for removal of existing gas boilers and out of date chillers and replacement with a new the installation of eleven Air Source Heat Pumps (ASHPs) and three small, prefabricated, plant-rooms across four pre-existing utilitarian zones within the Whatley Manor Hotel complex.

As an EarthCheck Gold Certified Hotel, Whatley Manor is committed to continuously improving the sustainability of the Hotel and Spa. The installation of ASHPs, as a part of their decarbonisation scheme, would enable the production of renewable energy at Whatley Manor, significantly contributing towards their energy target of removing 95% of fossil fuel consumption by the hotel. The introduction of renewable energy generation would enable Whatley Manor to continue to deliver their reputed luxury hospitality and unique leisure experiences to guests and the wider local community alike, whilst honouring their commitment to sustainability.

SIGNIFICANCE OF BUILDING and HERITAGE STATEMENT

The NPPF defines Significance as "The value of a Heritage Asset to this and future generations because of its Heritage interest. The interest may be architectural, or historic. Significance derives not only from heritage asset's physical presence, but also from its setting" and as such it will be discussed here.

Whatley Manor is an architecturally Significant Grade II Listed Building situated in Brokenborough Parish on the north of the Wiltshire Council and it is Listed under Historic England Entry Number: 1023196.

The building was once a country house, but it is now a hotel. The building developed around an C18 farmhouse nucleus, constructed in coursed rubble on a U-shaped plan. In the 1920s, the building was substantially expanded and adapted by Septimus Warwick of London, under instruction of the then current owner H C Cox. Coursed rubble stones and stone

dressing to fenestration were introduced to the original farmhouse and new extensions were built in squared rubble with flush dressed stone quoins, stone chimney stacks and stone tiled roofs. The two and three light, leaded wooden casements and stone mullioned casements with leaded lights are typical for this early C20 period of the development.

The interiors have a number of significant features from this period. The very high-quality panelling and Palladian style door sets in the two drawing rooms are particularly noteworthy, as well as a very elegant staircase. Some original Jacobean panels are present in the interior. Since these panels significantly pre-date even the earliest sections of the building, one can only conclude that they were brought from another property.

The original building was arranged around a courtyard approximately orientated Northwest/Southeast. The Northwest end was a main residential part of the original house whilst the Southeast corner consisted of converted stabling running along three sides of the adjoining "Stable Yard". A small kitchen was originally included within the converted stabling adjacent to the dining room within the main building.

The main block of the building, containing older parts of the original farm house, is situated at the centre of the South end protruding substantially forward from the Southwest elevation in relation to the West block. The block is two story high with an attic space. Two chimneys are positioned centrally on the ridge line, one is of dressed stone and the other of rubble, in two steps and with chimney pot. The ridge line drops slightly in height to the South end and the cross gable protrudes forward slightly. There are C19 bay windows on the ground floor, all mullioned casements in simple dressed stone surrounds, squared and not keyed to the rest of the wall. Two storey bay was added to protruding part of elevation in early C21 renovation when Whatley Manor was again extensively refurbished, added to and altered to create a high-quality hotel and spa complex.

The new restaurant on the ground floor, kitchen and accommodation wing were built to the east side of the entrance courtyard in the early C21 redevelopment/refurbishment project. It was designed to reflect the existing group on the Northwest side in terms of scale, character and massing. The original kitchen was removed during this period and a new Orangery was added.

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On one side of the Stable Yard, stable buildings were refurbished and converted into offices. At the same time the Health Spa has been built in the position of the former orchard. It is a contemporary building with grass roof. The Spa area incorporates a few smaller parts of refurbished stables on the other side of the stable yard, on the side of carpark and towards gardens, but is mostly built in the early C21.

There are a few service areas within the complex. The main service yard adjoins the carpark. The view into the service yard from the car park is prevented by a C21 outbuilding, the "Bothy", and a C21 wall. The rear and opposite side of the service yard are enclosed by a 2m high closed board timber fence, well-developed trees and hedging, concealing this utilitarian area from the sight of neighbouring properties.

Across the drive from entrance to the "Bothy Yard", down a steep slope is a service lift and stores, above which is main chiller pack situated on C21 RC slab, partly concealed by the low level wall. The lift shaft itself is extended into a small C21 roof extension adjacent to a gable of a historic building.

Further down the drive, on the south-east part of the hotel are further utilitarian areas. Within the basement of the C21 part of the SPA building is a plantroom serving the hotel and SPA. External entrance to the plantroom is through the adjacent external service shaft housing the vents of air handling units. The service shaft is surrounded by further utilitarian facilities such as greenhouses, composting yard, sewage pumps, and sewage treatment plant. All three servicing areas of the hotel are currently open to view of the guests.

The impression of this high-quality hotel is one of a conglomeration of buildings developed over many years to form a harmonious entity. In reality, the majority of the buildings have developed either in early C20 or early C21.

PROPOSED WORKS

The proposed works comprise of the removal of the existing boilers and chiller units and installation of eleven ASHPs, with accompanying noise attenuation and required supporting operational components, divided between the current utilitarian sites within the Hotel.

It is proposed that a chiller unit, of negative aesthetic value, situated on the platform above stores is removed and replaced by prefabricated plant-room (4mx2mx2.3m) in "Mushroom" RAL 080 70 10 BS 10B19, containing buffer vessels and pumps serving domestic hot water system and a kiosk for power perfector (1.7mx1.1mx2.05m) also in "Mushroom" RAL 080 70 10 BS 10B19. A structural steel base would initially need to be constructed to enhance the structural strength of the existing 200mm thick RC slab and distribute the load of the plantroom and the power perfector, as the existing concrete substrate has insufficient structural integrity to do so. A guard rail would also be installed to ensure no one can fall off the steel platform. A light weight, softwood, redwood trellis covered with evergreen honeysuckle would be positioned on top of the existing wall, where the chiller pack is now placed and in front of the proposed installation to conceal the courtyard from view from the Car Park. The goods lift adjacent to the courtyard entrance-way would also get a secondary, new, solid, iroko door in structural grade iroko with a clear finish to conceal the unsightly, existing metal lift doors.

A further two Clade Rowan 2 ASHPs, for Spa Heating, and an accompanying prefabricated plantroom in "Holly Bush" BS 14C39 would be installed in another utilitarian area currently used for composting. The composting heaps and the C21 concrete block walls dividing the site into composting bays would be removed. A concrete slab already exists in this position. However, the existing slab would need to be partially replaced to ensure it could provide adequate structural support to the ASHP units and plantroom. The noise generated from the units would be attenuated on the northern and western sides by a Class A Acoustic Absorber Screen by AGS of 3m height, in "Holly Bush" BS 14C39. The absorber screen would mostly be concealed by a pre-existing, 3.2m high, thick hedge which would be further extended to screen the full length of the attenuation barrier from view. The units and plantroom would be enclosed within the new compound itself and by a new, metal grill fence with a double gate to match the existing one in the C21 "Bothy" service yard. The

entrance to the whole

area would be provided by a new, solid, closed boarded iroko gate in structural grade iroko, with clear finish and cast-iron hinges, painted black. The new gate would hide this functional zone from view and provide further noise attenuation.

Another five Clade 2 Rowan ASHPs, for the heating and cooling of the Hotel, and another accompanying prefabricated plantroom in "Mushroom" RAL 080 70 10 BS 10B19 would be installed in the C21 "Bothy" service yard in two groups - one group would consist of two ASHP units plus plantroom and the other of three ASHP units. These groups would be positioned either side of the service yard access road. The two Clade units and plantroom would be fixed to the pre-existing concrete slab, behind existing stone walls separating the service yard from the car park and the road. The concrete slab would require localised levelling to ensure a stable base for the ASHP units and plantroom. The noise generated by the ASHP units would be naturally attenuated by the surrounding walls and "Bothy" building. The remaining three Clade units would be positioned on the opposite side of the access road. The current hardcore substrate would require removing and replacing with a concrete slab to suitably support the ASHP units. The units would be flanked by Class A Acoustic Absorber Screens by AGS of 3m height in "Holly Bush" BS 14C39. There is no need to visually attenuate the south-eastern screen as it is only visible from other utilitarian, service buildings. However, the north-western screen would be concealed by a green wall plus a stone pier to match the stone wall on the opposite side of the service yard entrance. A solid, closed boarded Iroko gate in structural grade iroko with clear finish and cast-iron hinges painted black would be installed across the service yard entrance to hide the yard from view.

An old generator would be removed from an existing C21 outbuilding, the "Bothy", in the service yard. The new generator, buffer vessels, pumps and any attenuation needed to support the operation of the ASHPs would be installed within the "Bothy". A new, upturned exhaust flue would replace the current short, straight flue, reusing the existing hole in the "Bothy" side wall. The new Generator would be attenuated to ensure

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It is suggested that a replacement, six-bay, composting area is erected opposite the "Bothy" building across the service yard. This part of the service yard is currently used for open air storage of gardening and maintenance equipment which would be moved into the Bothy building itself.

Lastly, four, low-level Polytronic Master Inverter L+ ASHPs would be installed in the Plantroom service yard for the heating of pool water. These would be positioned on a perimeter wall of a sunken 'well' adjacent to the existing AHU ventilation shafts and behind an existing UPVC Greenhouse and several raised, wooden planters. The C21 coping to perimeter wall would be lifted in places where the four ASHPs are to be installed. The perimeter wall would then be strengthened with stainless steel plates and the existing coping in areas under the units would be replaced with 600mm wide pennant sandstone bedded on the stainless steel plates, to receive ASHPs.

A smaller, metal framed greenhouse would be removed to make way for a noise attenuating and visually concealing 2m high hedge, curving along the edge of the road accessing the service yards. A solid, close boarded Iroko double gate in structural grade Iroko, with a clear finish and cast-iron hinges painted black, would be added to the entrance way to further mitigate noise emissions and hide the Plantroom service yard from view.

RELEVANT PLANNING POLICY CONTEXT

Several national and local planning contexts are applicable to this application.

National Planning Policy Framework (NPPF)

National Planning Practice Guidance (NPPG)

Wiltshire Council's Core Strategy

Key policies are thematically grouped below, addressing each major context.

In relation to Listed Buildings, Heritage Assets and their Settings:

Planning (Listed Buildings and Conservation Areas) Act 1990 Section 16 notes that in determining whether listed building consent should be granted or not, 'special regard to

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the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' will be given. Furthermore, that given consent should 'enure for the benefit of the building and of all persons for the being interested in it'.

National Planning Policy Framework (NPPF) 2024 *Conserving and Enhancing the Natural*

Environment paragraph 219 notes that proposed new developments within the setting of heritage assets that 'enhance or better reveal their significance' whilst 'preserve those elements of the setting that make a positive contribution to the asset should be treated favourably'.

Wiltshire Council Core Strategy 2015 CP51 *Landscape* notes that proposed developments 'should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design'.

Wiltshire Council Core Strategy 2015 CP58 *Ensuring the conservation of the historic environment* states that 'designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance'.

Wiltshire Council Core Strategy 2015 CP57 *Ensuring high quality design and place shaping* requires a high standard of design in all new developments and alterations.

In relation to Climate:

National Planning Policy Framework (NPPF) 2024 *Meeting the Challenge of Climate Change, Flooding and Coastal Change* paragraph 161 highlights that 'the planning system should support the transition to net zero by 2050' and should 'support renewable and low carbon energy and associated infrastructure'.

National Planning Policy Framework (NPPF) 2024 *Meeting the Challenge of Climate Change, Flooding and Coastal Change* paragraph 167 notes that proposals for energy efficient and low carbon heating improvements for existing buildings, including the installation of heat pumps, should be given 'significant weight'.

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National Planning Policy Framework (NPPF) 2024 *Meeting the Challenge of Climate Change, Flooding and Coastal Change* paragraph 168 states 'local planning authorities should: a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future'.

Wiltshire Climate Strategy Delivery Plan 2025 acknowledges the climate emergency and sets the ambitious target of making the county 'carbon neutral' by 2030 with reduction in greenhouse gas emissions and support of renewable and low carbon energy solutions being core objectives.

In relation to Noise:

National Planning Policy Framework (NPPF) 2024 *Conserving and Enhancing the Natural Environment* paragraph 187 point 'e', notes that developments that would introduce 'unacceptable levels' of noise pollution should be prevented.

National Planning Policy Framework (NPPF) 2024 *Conserving and Enhancing the Natural Environment* paragraph 198 points 'a' and 'b', note the need to 'mitigate and reduce to a minimum, potential adverse impacts resulting from noise from a new development – and avoid noise giving rise to significant adverse impacts on health and quality of life' and to 'identify and protect tranquil areas'.

Wiltshire Council *Planning Consultation Guidance Note: Noise and Vibration 2023* paragraphs 3.1 and 3.2 request that potential noise impacts of a proposed industrial or commercial development are assessed by acoustic specialists in accordance with BS4142:2014+A1:2019. The results of the BS4142 assessment should be considered in relation to the Noise Hierarchy as summarised in section 4.1.

Wiltshire Council *Planning Consultation Guidance Note: Noise and Vibration 2023* paragraph 6.6 notes that the introduction of a new industrial or commercial noise source 'should be designed so as to achieve a rating level of 5dB (LAeq) below the typical background (LA90) level at the nearest noise sensitive location'. Where this condition cannot be automatically achieved noise mitigating measures should be included within the proposed scheme and fully substantiated for consideration.

Wiltshire Council *Planning Consultation Guidance Note: Noise and Vibration 2023* paragraph 6.13 urges that noise should be 'a priority concern' when considering the installation of ASHPs.

EVALUATION OF THE PROPOSAL AGAINST RELEVANT PLANNING POLICIES

There are three core Planning Policy contexts relevant to this proposal – the impact of the proposal on the Significance of the Historic Asset, as well as the impacts on Climate and Noise.

Whatley Manor is a fine example of a Significant Grade II Listed Building. The proposal does not affect the historic building fabric, only adjacent, outdoor sites already given over to utilitarian services for the running of the Hotel.

Thus, the proposal preserves the historic fabric of this Significant Grade II building. These utilitarian service zones are currently open to view. Therefore, the care and sensitivity shown in the proposed scheme to conceal these utilitarian areas behind more visually pleasing green walls and iroko gates offers an improvement to the setting of this Heritage Asset.

The proposed installation of eleven ASHPs supports the transition to renewable energy generation and the reduction of greenhouse gas emissions. Therefore, it contributes to both National and Regional sustainability targets, as outlined by the NPPF paragraphs 161, 167 and 168 and the Wiltshire Climate Strategy Delivery Plan 2025. Furthermore, it would enable Whatley Manor to maintain and advance their EarthCheck Certification, ensuring the Hotel remains a global leader in sustainability within the hospitality sector.

A noise impact assessment was conducted by acoustic specialists, Ion Acoustics, as requested in the Wiltshire Council *Planning Consultation Guidance Note: Noise and Vibration 2023* and appropriate noise attenuation has been a priority within the design to ensure the proposal will not incur the adverse impacts of noise pollution on guests, staff or neighbours. Ion Acoustic found that the proposed scheme was comfortably within determined noise emission limits and that noise emissions would be lower than those of the existing chillers and generator.

m a r k l o v e l l d e s i g n e n g i n e e r s

Therefore, the proposal constitutes an improvement to the audible environment and fulfils the obligations set out in the NPPF and Wiltshire Council *Planning Consultation Guidance Note: Noise and Vibration 2023* (please see the Ion Acoustic Report submitted alongside this application).

The proposal would also enable Whatley Manor to continue to provide this high quality amenity to the local community and the guests alike, which is clearly highly desirable and of Public Benefit.

It is considered that the proposal is in line with all relevant policy contexts and the guidance given.

CONCLUSION

Whatley Manor is an architecturally Significant building within the category of Grade II Listed Buildings. The removal of existing gas boilers and out of date chillers and installation of eleven ASHPs within current, outdoor, utilitarian areas of the Whatley Manor Hotel complex preserves the historic building fabric, improves it's setting and reduces noise emissions, whilst decarbonising the hotel and introducing renewable energy generation.

It is considered that the proposal is in line with the guidance given in NPPF and the Applicant hopes that the proposal will gain approval of the Local Planning Authority.

APPENDIX I

PHOTOGRAPHS



PH01



PH02



PH03



PH04



PH05



PH06



PH07



PH08



PH09



PH10



PH11



PH12



PH13



PH14



PH15



PH16



PH17



PH18



PH19