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FAO: Ms Helen Garside and Ruaridh O'Donoghue

Our ref: GAO/SAV/BNE/U0011639

Your ref: PP-15180303

07 September 2026

Tottenham House and Estate, Savernake, Marlborough, Wiltshire, SN8 3BE
Town and Country Planning Act 1990 (as amended)
Application for Planning Permission
Picture Gallery (building no. 47) , North Pleasure Grounds and East Park

On behalf of our Client, Mr Chris Rokos ("the Applicant"), we write to enclose an application for planning permission in connection with the proposals for the vertical borehole ground source heat pump array in East Park with connecting pipework through the Ha-Ha and North Pleasure Grounds to the Picture Gallery in order to provide power to the Picture Gallery at Tottenham House and Estate, Savernake, Marlborough, Wiltshire.

Relevant Planning History and Background

Outline Planning Permission (ref. 17/12461/OUT) was granted for: "Hybrid planning application: 'full application' for change of use and some extension/alteration of Tottenham House and grounds to residential use (C3 use) from educational use (C2 residential institution) and ancillary leisure development, related staff accommodation, and associated landscape works; 'outline application' for outlying related family houses and further related staff accommodation" on 7 December 2018.

Listed Building Consent (ref. 18/00195/LBC) was granted for: "Repairs and some extension/alteration to Tottenham House, The Old Stables, the Octagonal Pavilion and other outbuildings and garden walls within the curtilage of Tottenham House, to facilitate re-use as a country house and estate" on 14 June 2018.

Several Non-Material Amendment applications to the Outline Planning Permission (ref. 17/12461/OUT) and associated Listed Building Consent applications have been made for further alterations to the Main House, Old Stables, Octagon, Walled Gardens and Pond Cottage to better reflect the Client's design aspirations and to bring about improvements to the internal and external condition of the buildings since 2019.

Listed Building Consent (ref. PL/2024/09243) was granted for the following: "Repairs and extension/alteration to Tottenham House (including the erection of a Picture Gallery extension), the Old Stables, the Octagon Pavilion and other outbuildings and garden walls within Tottenham House and Estate to facilitate re-use as a Country House and Estate." on the 5 September 2025.

Most recently, planning permission (ref. PL/2024/09312) was granted for: "Variation of Conditions 2-6, 8-10, 17-19, 21-23 and 25 of planning permission reference 17/12461/OUT to enable revised ancillary accommodation proposals including the erection of new buildings comprising an Estate Office, Grand Avenue Lodge, Maintenance Barn, Irrigation Plant and Store, Pool House, a second substation and

Picture Gallery extension to Tottenham House in lieu of some of the previously proposed staff and leisure accommodation, together with revised landscape proposals, the creation of a subterranean family link between the Main House, Stables and proposed Pool House, and associated works.” on the 29 January 2026.

Relevant Approvals

A non-material amendment application was approved 17 September 2020 in respect of planning permission ref. 20/03107/FUL for the construction of an energy centre in the grounds of Tottenham House and Estate and associated works. The approved amendment provided for the construction of borehole BH2 and inserted two additional approved plans into condition 2 (list of approved plans): Proposed Estate Location Plan (6150/PL01-BH2, dated July 2020) and Proposed Site Plan (6150/PL03-BH2, dated July 2020).

Planning permission ref. 20/06095/FUL was granted on 08 October 2020 for the installation of 1 no. borehole to the south-west of Saddle Ride, within the grounds of Tottenham House and Estate.

On the 25 March 2021 ref. 21/01585/FUL was approved for an array on the Estate for the “the Installation of a ground collector horizontal array system of ground source heat pumps within the grounds of the Stable Belt at Tottenham House and Estate.”

On 17 October 2025, an approval of details application was approved (ref. PL/2025/06353) partially discharging Condition 17 of Outline Planning Permission (ref. 17/12461/OUT) in respect of the installation of trench routes across the Estate, including behind the East Park and Pleasure Ground Ha-Ha, principally associated with the installation of various data connection and water supply services at Tottenham House and Estate. The approved trench routes include the route between the East Park and the Picture Gallery along which the proposed GSHP flow and return pipework would be installed.

Consultation with Wiltshire Council

Prior to the submission of this application, Wiltshire Council has confirmed that this application must be submitted as a new full planning application, as the heat pump system constitutes operational development requiring permission in its own right. Wiltshire Council confirmed that the supporting information submitted within this application cover the Wiltshire requirements.

Proposals

This application seeks full planning permission for the installation of a ground source heat pump (GSHP) borehole array within the East Park, together with associated below-ground pipework connecting the array to the plant room within the basement of the approved Picture Gallery at Tottenham House.

The proposed borehole array is required for the GSHP system which will be connected to the approved Picture Gallery.

The GSHP units are key to being able to offer an energy efficient and sustainable solution to the energy demand of the building and require a 'ground coupling' in order that they can extract geothermal energy.

GSHPs were selected as the most appropriate low carbon technology which could offer an energy efficient solution to the significant energy demands of the Estate, as established through the Energy Centre permission (ref. 20/03107/FUL) granted on 8 June 2020. That technology is incorporated into the design of the energy infrastructure that will provide heating and cooling to the Picture Gallery.

This application is for the ground coupling to take the form of a vertical 'borehole array' comprising of a closed system which circulates water (and glycol mix) through pipework installed in vertical boreholes. Since the pipework is a closed loop no water is extracted from or discharged into the ground or the watercourse.

This system, when connected to the GSHPs located in the Picture Gallery, extracts geothermal energy from the ground via the contact between the ground and the pipework.

The borehole array will comprise 18no. 126m boreholes each with a U-bend of 40mm diameter pipework. Horizontal 'header' pipework will connect the pipework within each borehole to an underground manifold and 'flow and return' pipework will connect the manifold to the plant room within the basement of the Picture Gallery for the connection to the GSHP units. All horizontal pipework will be buried 1m below ground level and is proposed to be installed within the trenches approved under application ref. PL/2025/06353 for the installation of electrical cabling and fibre and which will follow the same route which will mean no additional impact on this regard.

Further details and technical justification, including the specification, purpose and requirements of the borehole array, are set out in the GSHP Borehole Array dated 7 August 2026, prepared by Rendesco and submitted as part of this application. The detailed design of the borehole array shown on the Borehole Trench Layout (ref. 3894-REN-DRW-ME-00501-P01), prepared by Rendesco. These documents should be read in conjunction with this Covering Letter.

The proposed works involve trenching through existing grassland within the North Pleasure Grounds in order to lay the pipework, and the connection between the manifold and the Picture Gallery would follow the alignment of the services trench previously approved under application reference: PL/2025/06353 for the installation of electrical cabling and fibre and which will follow the same route which will mean no additional impact on this regard. Once the pipework has been installed, the affected areas will be sown with grass and reinstated to their existing position.

The application site extends to approximately 0.54 ha. As the site area is less than 1 hectare, no Flood Risk Assessment or Drainage Strategy is required.

Accordingly, planning permission is sought for the following:

"Installation of a ground source heat pump borehole array and associated below ground pipework within the East Park and the North Pleasure Grounds to connect to the approved Picture Gallery."

Accordingly, we enclose the relevant details in respect of the installation of an array of boreholes to serve a ground source heat pump system in the grounds of Tottenham House and Estate, for your formal approval.

Arboricultural

The proposals have been reviewed by the projects Arboricultural Consultant, (NB Tree Management).

The proposed connection between the GSHP borehole array and the Picture Gallery follows the same route as the installation of electrical cabling and fibre previously approved by Wiltshire Council under reference: PL/2025/06353. On the basis that a cabling route and trench has already been consented in the same location, no amendment to the route is considered necessary, and the arboricultural implications of the proposals are directly comparable to those already accepted.

The proposed works would be undertaken in accordance with the following arboricultural methodology. NB Tree Management has reviewed the proposals from a tree impact perspective, considers the approach to be acceptable and have provided the following commentary:

Where ducting, and other proposed services, are to be installed, and they are located within the root protection zone (RPZ) area of retained trees, they shall utilise specialist installation techniques such as:

- *Excavation with hand-held tools, air spade, or vacuum excavation machine*
- *Trenchless installation methods such as moling, thrust boring, directional drilling etc.*

Installation in RPZ locations will be undertaken under the supervision of an Arboriculturalist to ensure an appropriately sensitive approach is implemented to minimise impact to trees.

By adopting the above approaches the utilities and services can be installed without material harm to the retained trees.

Overall, the works proposed as part of this application have been carefully developed to minimise impact to trees and are therefore considered to be acceptable in terms of tree impact, with no material or significant impacts expected to arise from the proposals.

Corrigan Gore, as Project Manager, has confirmed that all works of installation within RPZ locations will be undertaken under arboricultural supervision, ensuring an appropriately sensitive approach is implemented to minimise impact to trees.

Archaeology

The Project's Archaeology Consultant (BSA Heritage) has reviewed the proposals and provided the following commentary:

The archaeological implications of the proposals for GSHP boreholes and associated works has been considered and discussed with the WC archaeologist. The area affected has previously been subject to trial trenching in 2005 by Wessex Archaeology and higher archaeological potential for prehistoric and Roman sub-surface remains has been identified in the vicinity. The investigations also identified a masonry wall which may be related to an earlier phase of building at Tottenham House, albeit this was not firmly dated. Despite this higher potential, the array of new boreholes themselves would have a limited impact which it would not be practical to monitor. Trenches would run close to the borehole array, but are likely to be approximately a metre wide and deep and would, in effect, equate to evaluation trenching. A further narrow trench would link the array to the Picture Gallery. Given the low impact the proposals represent, it should be acceptable for the new trenches to be subject to archaeological monitoring when they are excavated. This work could be completed in accordance with existing Written Schemes of Investigation, to include analysis of the results and reporting.

Given that the boreholes themselves would have a limited impact, and that archaeological monitoring of the trenches would be an acceptable and proportionate response, it is considered that the proposals would give rise to no unacceptable archaeological impact.

Ecology

The Projects Ecologist (Ecology by Design) has reviewed the proposed borehole route and cross-section plans and has provided the following commentary:

The ground array will comprise a series of relatively small-bore pipework of approximately 40–50 mm diameter, buried some 1.0–1.5 m below ground level and routed in long, interconnected linear lengths spaced at approximately 1.5–3.0 m centres. Given the small-scale and localised nature of the works, the Project Ecologist has confirmed that the proposals do not raise any significant ecological concerns.

Nevertheless, given the ecological sensitivities present across Tottenham House Estate, the following precautionary ecological working measures should be implemented during the works:

- **Great crested newts:** Where ground-breaking works are required within grassland or other suitable terrestrial habitat, these should not be undertaken during the great crested newt hibernation period (November to February inclusive). This will minimise the risk of disturbing or uncovering hibernating great crested newts, which are a protected species known to be present across the Estate.
- **Vegetation clearance:** Any areas of tall or dense vegetation requiring removal to facilitate the works should first be reduced to approximately 100 mm, before being subsequently reduced to approximately 50 mm, at which point a fingertip search of the affected area should be undertaken for any vulnerable fauna. In the unlikely event that a European Protected Species,

including a great crested newt, is encountered, all works in the immediate vicinity must cease and the project ecologist contacted immediately for advice on how to proceed.

- **Open excavations:** *To safeguard small mammals, amphibians and other fauna that may be present across the Estate:*
 - *any trenches, pits or other excavations left open overnight should either be securely covered or provided with a suitable means of escape. This may comprise a gently sloping edge or a stable, roughened plank positioned at an angle of no steeper than 45° to provide a ramp to the surface; and*
 - *all open trenches, pits and excavations should be inspected each morning before works recommence to ensure that no wildlife has become trapped overnight. Should any wildlife be found trapped within an excavation, the project ecologist should be contacted for further advice where required.*

Subject to the implementation of the precautionary measures set out above, the Project Ecologist has confirmed that there are no ecological concerns regarding the proposed borehole layout as currently shown.

It is therefore considered that the proposals would give rise to no adverse ecological effects.

The Applicant remains committed to the progressive decarbonisation of the Estate's energy supply, having already delivered the Energy Centre and its associated ground source heat pump infrastructure as the principal low carbon heat source for the Estate's buildings. The proposals form the next stage of that commitment, extending the established renewable energy infrastructure to serve the Picture Gallery to provide the stable internal environment necessary for the long-term conservation of the estate.

Conclusion

The submitted details have been considered in a sensitive and coherent manner, with the key members of the Project Team including the Conservation Architect (ADAM Architecture), Archaeology Consultant (BSA Heritage), Arboricultural Consultant (NB Tree Management) and Ecological Consultant (Ecology Consultant) to ensure that the proposals for the vertical borehole GSHP array are appropriate in the context of the Tottenham House and Estate.

These proposals further showcase the careful and responsible stewardship of the Applicant and their Team of Specialist Advisors and the significant financial investment that they are willing to continue to commit to the restoration of Tottenham House and Estate, including the implementation of sustainable renewable energy generation.

Application Documentation

In accordance with the validation requirements of Wiltshire Council, alongside this Covering Letter, we enclose the following documentation:

- Approval of Detail Application Forms (ref. **PP-15180303**), prepared by Newmark;

ADAM Architecture:

- Site location Plan (THIF01-ABA-ZZ-AA-DR-A-1038)
- Existing Site Plan (THIF01-ABA-ZZ-AA-DR-A-1039)
- Proposed Site Plan (THIF01-ABA-ZZ-AA-DR-A-1040)

Rendesco:

- Borehole Trench Layout (3894-REN-DRW-ME-00501_A4)
- GSHP Technical Briefing Note

Summary

This application has been submitted via the Planning Portal. The requisite application fee of £2,003.00 (including the £149 Planning Portal service charge) has been made concurrently to the submission of this application by the Applicant.

In the meantime, should you have any queries, please do not hesitate to contact Sam Aviss (020 3486 3524) or Belinda Neilson (020 3486 3782) of this office.

Yours faithfully,



Newmark

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Enc. As above via the Planning Portal