

## **OBJECTIONS/COMMENTS ON PLANNING APPLICATION PL/2022/00677 OF THE SALISBURY CATHEDRAL CLOSE PRESERVATION SOCIETY (“THE SOCIETY”)**

### **SUMMARY OF THE SOCIETY’S VIEWS**

These objections and comments are made by the Trustees of the Society, registered charity 1015692. Its charitable aims include the preservation, protection and improvement of the area around Salisbury Cathedral, particularly Salisbury Cathedral Close (“The Close”).

The Society is of the view that, for the detailed reasons given in this response, this application as it stands is inadequate, in terms of the detail as to how the historic fabric of this Grade 2\* property will be safe-guarded; and should be withdrawn and resubmitted. It is crucial that a revised application takes full account of the historic fabric that is there, and its restoration, and adapts/reuses it sympathetically.

The Society appreciates that Bishop Wordsworth’s School (“BWS”) might want a return on its investment in restoring this building (“the Stables”) and that it wishes to apply for a residential use. However, the Society would be opposed to “use as an AirBnB type facility during the school holidays” mentioned in the Design Statement.

### **DETAILED ANALYSIS OF DOCUMENTS SUBMITTED FOR THIS APPLICATION**

#### **The Application Form:**

- Says that there will be no partial or total demolition. The legislation does not provide a definition of what demolition is. Under the current plans, half of the hayloft floor will be removed along with internal fittings in the ground floor – is this not demolition of part of the Stables, so the answer is somewhat contradictory?
- Para 8: Says “Yes” to the “stripping out of any internal wall, ceiling or floor **finishes**(e.g., plaster, **floorboards**?)” Whilst scant details are given of the type of bricks that might be used on the exterior, there is nothing on how the interior is to be re-developed. This is inadequate as this is all original material. In addition, it refers to the Design & Access Statement for this detail, which says nothing about any floors or interior fittings on the ground floor.
- Para13: Makes it clear that the development will not provide any parking spaces. This is important since, if the property is going to be occupied, it is likely a tenant would need a parking space. The parking on the highway outside the Stables is broadly allocated already, and there is parking pressure in The Close, so the lack of tenant parking needs to be addressed. Were this to be an AirBnB, the problem would be exacerbated. One option might be, as and when a consent for this development is given, to impose a condition that BWS allocate a parking space for the Stables within its own curtilage.
- Para 17: Says there are no protected or priority species in the Stables. Given the size of the gaps in the Stables brickwork, it is quite possible there will be bats in residence. Has a bat survey been undertaken?
- In the Description of the Proposal, this is described as “Conversion of the existing stable into residential accommodation”. In Para 19, it says that the

provision is for "social, affordable or intermediate rent" residential/dwelling units. There is **no** mention of commercial letting. In the Design Statement, there is mention of AirBnB type facilities in the school holidays. The Society would strongly resist this and ask that if this development does go ahead, it should be a condition that it is only for use by BWS staff or on long residential lettings and not for any holiday accommodation/short lets. [f there were to be holiday lets in the school holidays, we foresee problems of lack of control of lettings, parking issues, and issues of noise.

- Para 27: It's unfortunate BWS did not seek pre-application advice.

### **The Design and Access Statement – Heritage Statement**

This document purports to be a Heritage Statement. It is not. It gives almost no information about the Stables; why it is listed under 11 The Close, not BWS; why BWS is making this application, not No.11; and what the Stables' history is and the importance of its fabric[ The National Planning Policy Framework ("NPPF") describes a Heritage Statement's role - "In determining applications, **local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.** The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. **As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.** Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."

- The Design and Access Statement is inadequate. It shows no understanding of the importance of the internal fittings to the Stables such as wood panelling and the original stable stalls which are original historic fabric, although it at least mentions some effort to preserve the timbers in the roof.
- The Introduction to the Stables has flaws. It :
  - Mentions possible use as an AirBnB which does **not** align with the Application Form.
  - Contains only one (rather inadequate) photograph of the internal fittings of the Stables, including panelling and divider(s) between the stall(s) and no description of its historic significance.
- Planning Considerations: This mentions the relevance of the NPPF, Section 12, "Conserving and Enhancing the Historic Environment" (which is confusing, as the NPPF was updated last year and the relevant Section is now 16) but makes no effort whatsoever to address the requirements of the Section regarding conservation of heritage assets. The NPPF says:- ""

199 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). **This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.**

**200Any harm to**, or loss of, the significance of a designated heritage asset (**from its alteration or destruction, or from development within its setting**), should require **clear and convincing justification**. Substantial harm to or loss of: .....

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, **grade I and II\* listed buildings**, grade I and II\* registered parks and gardens, and World Heritage Sites,

**should be wholly exceptional.** ""

- The Proposed Plans (**confusingly** labelled "existing plans" under each drawing):
  - Appear to strip out **all** the existing fittings of the Stables, including the panelling and stalls, with no explanation as to how planning law permits this. In the Society's view, this conflicts with the NPPF (see above).
  - Because of the Application's paucity of detail and photographs, it is not clear how many screens/ stalls there are, or other ground floor fittings.
  - Appears to replace the hayloft hatch with a window, with the original hayloft door retained but left open. The applicant should be asked to confirm this and that the hayloft door will be restored, if necessary, as it is a distinctive feature of the North Elevation visible from the highway.
  - Appears either to replace the existing door or replace some of the panels with glass.
  - Appears to show the unusual "Horse collar" feature on the very top of the West Elevation as remaining. This feature is quite unique and catches the eye of passers-by on the roadway. Every effort should be made to ensure it is restored, if necessary, and remains in situ.

### **Design Proposal**

- There is no reference to advice from a structural engineer. An external review of the Stables cries out for this, given the statements about the condition of the building, the cracks visible from the roadway, obvious problems such as damaged guttering (meaning water has been discharged over brickwork for some time) and the proposals to remove half the hayloft floor. This must be addressed/the applicant should show that this has been done.
- The Design Proposal talk of internal insulation to comply with current building regulations. **There is no mention of the ground floor panelling. If carefully removed, it could be repaired and put back on top of the insulation. It could be incorporated, in part or whole, in the design for the Stables. There is NOTHING of substance in the proposals about the treatment of the Stables' historic fabric.**
- The Society was pleased to see that the applicant would rectify the completely out of keeping structural repairs on the courtyard elevation and the east elevation. These were carried out with modern London bricks and, not clear from the highway, it could even be cement, rather than lime mortar. We are amazed that this work received consent. We would suggest that if the application ultimately gets approved, there should be conditions that all bricks and mortars for the external works must be approved by the LPA.

- Nowhere in this document is there any mention of the floor of the ground floor of the Stables or what the floor of the Hay Loft is constructed of. In particular, the Society is concerned that neither of the rather inadequate photographs of the interior of the building shows any flooring. If the original floor of the Hay Loft is being partly removed, what of the remainder? If it has wooden floorboards, are they to be restored and to remain?
- For the ground floor, is the flooring to be retained? Is it to be lifted? If so, could there not be an archaeological issue, justifying a condition that any excavated areas should be subject to an archaeological inspection? The Society understands that the ground floor of the Stables is comprised of stone setts and that it was the subject of repair work 20-30 years ago. If it were to be lifted, there should be a planning condition that they should be recorded carefully before being removed so that they can then be re-instated correctly after any work is carried out.
- It appears the stable fittings, particularly the screen between stall(s), are going to be removed and disposed of. **A more creative and conservation-minded solution would be to reinstall this as a screen between the kitchen and sitting areas of the ground floor.**

## CONCLUSION

The Introduction to the Design and access Statement talks of its intention “to sympathetically convert the existing Stable & Hay Loft into a 1-bed Studio Flat”. The Society’s view is that the current application is a far from sympathetic conversion, ignoring, as it appears to do, much original fabric of a Grade II\* property. As can be seen on walking around The Close, many of the former stables and haylofts have been converted – some many years ago – to dwellings, so that adds to the importance of preserving as much of the original fabric of this rare building as is possible.

insufficient weight has been given to understanding, appreciating, preserving and incorporating existing features that are irreplaceable and to addressing the requirements of the NPPF. The documents provided barely touch on how original fabric is to be preserved; what is going to be destroyed, rather than trying to ensure it is used as part of the proposed design. That would be moving towards a “sympathetic” conversion.

This application should be withdrawn, reconfigured to address the shortcomings outlined above, and re-submitted.

As and when this application is approved, it should have a range of conditions applied by the LPA as suggested above.