

This submission is made by the Trustees of the Salisbury Cathedral Close Preservation Society ("the Society"), registered charity 1015692. The Society's aims include the preservation, protection, development and improvement of the features of historic or public interest in the Salisbury Cathedral Close ("The Close"). The Close is a unique place and the holding of a Christmas market in this location will materially and adversely affect it. Its uniqueness is well summed up in The Royal Commission on the Historical Monuments of England's report "Salisbury - The Houses of the Close". It says "The Close at Salisbury may be regarded as one of the most beautiful as well as the largest in England", talks of "The serene aspect of Salisbury Close today, with genteel houses overlooking long vistas and level lawns" and "that the Close still provides a spacious and dignified setting for the great Cathedral at its heart". For the preservation of the unique nature of The Close and for the reasons expanded upon below, the Society asks that Application 18/03096/FUL (the "Application") for a temporary change of use to hold a Christmas Market in 2018 only, (the "Market") be refused because: -

1 It is a change of use from a tranquil precinct to a large commercial market. The Market will create a significant adverse change to The Close. The given dates are from 22 November to 22 December, 31 days, with an additional period of up to 14 days for setting up and dismantling the Market. Close residents have very recently been told that dismantling may not take place until after Christmas. That is a substantial period of disruption to activities in The Close and to those living in The Close – more than 10% of the year and maybe as much as two months.

2 The Market will be sited in a primarily residential area, close to residential properties, with the potential for considerable disturbance. The disturbance will include increased traffic noise, congestion and access; music and entertainment noise; problems with parking and light intrusion. This residential nature is a key feature of The Close and sets it apart from those other cathedral closes where Christmas markets take place - such as Exeter and Winchester.

3 The Market would be in the churchyard of the Cathedral, a Grade 1 listed building. It is also in the Salisbury Conservation Area. The City of Salisbury Conservation Area Appraisal and Management Plan 2014 (the "Plan") highlights the **unique** nature of The Close, focusing particularly on its "quiet formality" and "tranquil character", the latter "due principally to the limited and restricted traffic flow and the absence of commercial enterprises within the walls."

The holding of a substantial commercial venture such as the Market runs counter to this claimed relative absence of commercialisation in The Close – and only some five years ago the then Dean indicated that she and the Cathedral Chapter would oppose any further commercialisation. This proposal goes against that commitment. Further, by agreeing to this pilot the Cathedral Chapter is giving a strong indication that it is willing to consider making this a permanent arrangement and has given no indication of the criteria it will deploy in evaluating the success or otherwise of the pilot. The Society wishes to point out that in

other recent planning applications in The Close, such as in relation to Mompesson House and Arundells, approvals were given subject to conditions restricting commercial activity. Indeed, even without the restrictions, these initiatives would have been minor compared with the intrusion of the Market.

The Plan also highlights, in addition to its tranquil, quiet formality, the spatial qualities of The Close. It stresses that Salisbury city has “surprisingly limited public green spaces” other than the watermeadows “and the tranquility and special quality of the Cathedral Close”. The Market being in The Close will undermine these unique qualities and the sense of a quiet, public green space. The Plan also indicates that the archaeological remains of the Bell Tower of the Cathedral, churchyard crosses and graves are “of considerable significance”. The Market will take place on the Bell Tower site and in the churchyard, which is inappropriate given their significance.

4 The BID Statement supporting the Application says that residents and commercial organisations in The Close were consulted before the Application was made. Most of the Society’s Trustees and many of its members are Close residents, and none of them was aware of any consultation: the Society certainly was not consulted. We only became aware of the proposal in October 2017 when residents were informed by the Cathedral Chapter that a contract had already been signed agreeing to the 2018 pilot.

Consultation is key to the planning process and participants need to understand clearly what is proposed from the filed documents. Essential information is not part of the Application, however. For example, planning applications in conservation areas should have detailed drawings of the development. The Wiltshire Council planning website advises “To judge the proposal it is important that your application shows how the proposed development will relate to the neighbouring buildings”. There is no plan, so the number and location of the cabins is not known, or where other facilities such as portable toilets and generators might be located. Key facts for respondents to the Application are not mentioned such as how noise and light intrusion will be managed. Many operational issues such as traffic management and installing/dismantling the Market are glossed over and/or left entirely to the Salisbury BID, the Cathedral and an events agency to determine **after the planning process has concluded**.

5 There is nothing in the Application regarding Security. This applies to security for The Close in general; for the stalls and visitors against theft during the day; and security for the stalls after darkness, when they are shut up.

6. Although the Cathedral Chapter Clerk has given assurances there will be no sales of food and drink for immediate consumption in The Close, there is no indication regarding how attendees will be prevented from bringing such items into The Close and consuming them and what steps will be in place to prevent anti-social behaviour which might result.

7 The chalets will sit on the Cathedral lawns for up to six weeks and this will damage the grass. The Application says reinstatement will be carried out at the earliest opportunity after the Market. Damage to grass in winter is not easily rectified, would take several months to

repair and would remain vulnerable thereafter. Returfing may not be possible in winter. Growing new grass from seed should ideally not be attempted until spring. The eyesore of dead/yellowed grass will be evident for many months. There is also a concern that a number of the stalls will be sited between mature trees. The Application mentions a method statement will be provided (but not to whom) to ensure their protection, but there is no detail in the Application.

8 Further details of planning concerns caused by the Market are listed below, followed by the Society's conclusions. These are: -

### **ACCESS TO THE MARKET, INCREASED TRAFFIC FLOWS, TRAFFIC CONGESTION AND DELAYS, PRESSURE ON PARKING AND ROAD SAFETY**

The Society addresses these issues together, since they are inter-linked. Increased traffic and higher numbers of larger vans and lorries servicing the Market and setting up and dismantling will cause disruption to the day to day traffic for The Close, such as deliveries, visits of workmen, attendance of workers (both employees and volunteers) and so on. There are two schools in The Close, for example, and most of the Market period will be during term time.

If there are, as the Society has been told by the Cathedral, about 50 stalls for four weeks, they will get many deliveries. The Application says they will be "staggered to prevent congestion and noise nuisance" but the Society questions how staggering alone can do this – indeed, how such staggering could be managed. There is a severe shortage of parking and dropping off spaces nearby, so problems are very likely.

The High Street Gate will be the access for all deliveries to the Market. The High Street Gate will also be access and exit for all vehicles involved in the construction and dismantling of the Market. The Gate creates a bottleneck which already restricts entry and exit to The Close. There will be inevitable congestion with numerous vehicles awaiting a chance to go through the Gate's single lane. This vehicular back log would create unmanageable congestion into the High Street and into Crane Street/New Street.

The bottleneck at the High Street Gate already means that unplanned events can cause great disruption. Something as seemingly minor as a delivery van stopping in the High Street immediately outside the High Street Gate can cause traffic to back up well beyond the High Street/Crane Street/New Street traffic lights at any time of year. This sort of event will happen during the period of the Market.

The Society notes that visitors in cars will be encouraged to use the Park and Ride service. Nevertheless, as there is a convenient car park within The Close, we remain very concerned visitors will seek to park there. This will add further to the congestion in The Close, as well as occupying much of the time of the Cathedral Close Traffic Management Team, who are also tasked with managing all the traffic servicing the Market.

The High Street Gate will be the dominant pedestrian access to the Market. The Society has concerns for their safety, particularly with increased volumes of traffic (many being large vehicles) and after dark. Based on visitor numbers from past markets, there could be as

many as six thousand a day. The configuration of the High Street Gate means pedestrians must move into the roadway when going through the Gate, as must wheelchair users and those pushing baby buggies.

## **NOISE**

In the open spaces of the Cathedral grounds, sound will carry, so noise issues are particularly important.

**TRAFFIC** - There will be noise from increased traffic and particularly commercial vehicles during the Market and for two weeks (at least) of setting up and dismantling the Market.

**GENERATORS** - The Application states these may be required and, if so, will presumably run for all the time when the Market is open. A serious concern would be if the lighting (and therefore the generator/s) is kept on after the Market closes for security reasons, as this would cause unacceptable disturbance to The Close.

**MUSIC AND ENTERTAINMENT** - The Application mentions a programme of entertainment without any detail. In previous Christmas Markets this included live music, amplified. This would not be appropriate in The Close.

There will be background music to the Market. Music for 50 stalls over the proposed Market area could be substantial. This will go on every day for 31 days.

**MARKET WORKS** - There will be noise involved in the setting up and dismantling of the Market over and above traffic noise. In previous Christmas markets, stall holders have changed during the period of the Market, further increasing the Market traffic.

## **LIGHT INTRUSION**

The proposed Market site is amongst residential homes, is an area with trees and is a churchyard, so the existing lighting is dim. The Market is taking place in winter, so it will be dark well before the Market closes. Bright lighting will be needed. This will be an unacceptable intrusion in the setting of The Close and a nuisance to nearby residential properties. The Society understands that good practice guidance for planning authorities from Historic England stresses that when a development takes place involving a heritage asset such as the Cathedral, the adverse effect on its setting is relevant and one consideration is "lighting effects and "light spill" ".

## **PUBLIC SAFETY**

The Application says the stalls "will be fireproofed". The Society is concerned whether this has been discussed with the fire service, given the use of lighting, greenery and festive decorations on the cabins, the proximity of cabins to trees and to buildings and possible use of generators. Where would the dangerously flammable fuel for any generators be stored?

Ambulances and fire engines must use the High Street Gate to enter and exit. Has the Market proposal been discussed with them, given the increased traffic congestion during the Market?

## **ENVIRONMENTAL HEALTH**

The Application states that there are existing toilets in The Close and Cathedral and it is not anticipated that temporary toilets will be needed. There are no public toilets in The Close. There are toilets in the Cathedral, but the Cathedral will not be open for all the Market's hours. There are also three toilets, including one disabled toilet, by the Bell Tower café, but it is uncertain whether these will be open – certainly for all the Market hours. In any event, given the large number of potential stalls (and therefore stallholders), it is to be expected that these will be used by them throughout the opening hours of the Market, putting further pressure on the facilities for visitors. No mention is made as to where temporary toilets might be placed if needed and these would be out of place in The Close.

## **CONCLUSION**

The Society is a charity dedicated to the preservation, protection and enhancement of The Close with its membership extending well beyond Salisbury. We have every sympathy for the current trading problems in the city. We have been told that the positive experience of Bath Abbey, and of Exeter and Winchester Cathedrals has nudged Salisbury's Cathedral Chapter towards allowing a pilot market in 2018. However, these are sited in the heart of their cities' shopping areas. Salisbury is also very different from these other cities in that The Close is only accessible through three medieval gates, thus creating an island of tranquility. The proposed change of use would severely affect this very asset. The presence of stalls in The Close would draw footfall away from the established shops rather than help them. A Christmas Market in Salisbury's Cathedral Close will always be at variance with its particular tranquil and non-commercial nature.

The present proposal is stated to be for a temporary consent for 2018 only. However, as an integral part of the City centre Christmas market that has operated for a number of years, it is likely to become a regular feature within that wider market. As part of a repeated event from year to year it will assume a more permanent character. The recurrent nature of the Market will therefore permanently and adversely change the nature and character of The Close.

The Society is of the view there are powerful arguments why the Application must be refused. If, however this Application may be approved, we urge that appropriate conditions are included in the consent to meet all of the above concerns.