

This third submission is made by the Trustees of the Salisbury Cathedral Close Preservation Society (“the Society”), registered charity 1015692.

It has been brought to the attention of the Society that Historic England has produced a publication which specifically addresses “Temporary Structures in Historic Places” (“the Guidance”). We ask the local authority that in reviewing Application 18/03096/FUL (the “Application”) for a temporary change of use to hold a Christmas Market in 2018 only, (the “Market”) this is done in the light of the Guidance.

## **LENGTH OF TIME OF THE MARKET**

The Guidance makes it very clear that “temporary” applies to “short-term events (i.e. for a period of days or weeks)”. In the present location, the number of weeks is too long for the Market.

## **PLANNING CONDITIONS**

The Society wishes to comment particularly on the sections of the Guidance which support asking for detailed conditions to be attached to planning applications for temporary structures in historic places.

Under the section in the Guidance on Project Management, it says where planning permission or consent is required, the applicant should be “providing all the information needed for decision-making, in particular clear details of the impact of the proposal.” As it is acknowledged by Mr Speer in a submission on behalf of BID that not all the necessary information has yet been submitted, as it should have been based on the above, this justifies asking for it as a condition to any approval.

The Guidance mentions planning conditions, saying “If planning permission is granted, conditions can be attached to ensure that the impact of temporary structures is minimised . Conditions may require re-instatement of affected areas to their former state within a given timescale, submission of additional information (such as a method statement, risk assessment or details of landscaping works), or restriction of the period permitted for a given structure or use. A set of possible conditions for use in relation to temporary structures is available from the Government Historic Estates Unit at English Heritage”.

We urge the local authority to impose conditions, if they are minded to approve the Application.

The Guidance also says that it is not just the structures themselves that need to be considered but also “there are associated impacts of car parking, footfall, deliveries, servicing, security, signage and connections to utilities e.g. electricity.”. Conditions may be appropriate for those matters as well. Indeed, signage ought to be addressed as part of the events management plan the Society has suggested.

We also refer to the Guidance which touches on a wide range of issues that should be addressed in the context of the visual impact of the structure, such as “screening of bins, generators, storage areas and toilets”; minimising adverse visual effects, including minimising set up and take down times, and ensuring re-seeding and re-turfing are carried out “promptly after the event”.

The Guidance also recommends, on the issue of protecting heritage structures, that there should be physical protection for vulnerable structures. There should be an agreed method statement for this. It should consider features such as gate posts, railings and trees. In this case, great care must be taken to protect The High Street Gate, which is vulnerable from high or overly wide vehicles. This issue could be addressed in the event management plan proposed by the Society as a condition of any approval of the Application.

## **BENEFITS OF TEMPORARY STRUCTURES**

The Guidance indicates that there are a number of potential heritage benefits listed in the *Historic Environment Planning Practice Guide* to PPS 5 (para 79) that could weigh in favour of a proposed scheme affecting the historic environment:

- It sustains or enhances the significance of a heritage asset and the contribution of its setting.
- It reduces or removes risks to a heritage asset.
- It secures the optimum viable use of a heritage asset in support of its long term conservation.
- It makes a positive contribution to economic vitality and sustainable communities.
- It is an appropriate design for its context and makes a positive contribution to the appearance, character, quality and local distinctiveness of the historic environment.
- It better reveals the significance of a heritage asset and therefore enhances our enjoyment of it and the sense of place.

**None of the above benefits apply here.** As a speculative trial, it cannot even be said to contribute to “economic vitality”. The Market does not need to be in The Close to do this.

## **SETTING**

The Guidance says that setting is defined as ‘The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.’ Applications for development affecting the setting of a designated heritage asset will need to be considered in accordance with Policy HE.10 of PPS 5. **English Heritage has issued draft consultation guidance on identifying the setting of heritage assets. The most important factor in considering setting is visual impact, including the impact on key views, and how this affects an understanding and appreciation of a place and its relationship with its context. Qualities such as quietness and general tranquillity in the setting of an asset can contribute to its public appreciation. The duration of the proposed change should also be taken into account in determining the effect of a development proposal on the setting of an historic asset. Very short term, genuinely temporary and wholly reversible changes are unlikely to have an unacceptable impact on setting. Longer term or recurrent changes, even if notionally temporary, may have a more serious impact.”**

The Society stresses that the highlighted section underlines the need to reject the Application for its visual impact in the conservation area and its effects on quietness and general tranquillity or, at the very least, to require detailed planning conditions being imposed.

## **DURATION AND SEASON**

The Guidance says “The length of time for which a structure is erected is an important factor in assessing its impact. For example, the impact of a marquee erected for one weekend is much less than the same marquee erected for a whole year. The season may also be a factor; for example, trees in leaf can help to screen temporary structures.” The Society reiterates that the time for the Market in this setting is too long and the Application should not proceed.

## **HISTORIC ENGLAND ADVICE ON WHAT INFORMATION SHOULD BE SUPPLIED IN SUPPORT OF A PROPOSAL**

The Guidance includes advice about the range of information it requires when consulted on proposals affecting nationally important heritage assets. The amount of information required should be proportionate to the importance of the heritage asset and the impact of the proposal. Here the Cathedral is a world class heritage asset and the information sought should reflect that.

The Guidance states “In addition to plans and drawings showing the proposed structure, a written statement explaining the statements, where these are relevant, such as Conservation Management Plans and local planning policies.

Depending to the circumstances of the proposal, additional supporting information may be necessary:

An evaluation of different options, assessing the different impacts and risks associated with alternative locations or designs.

visualisations and views analysis. Perspectives or photo-montages, models or computer-generated images can be used to show the impact of any structures on the heritage asset and its setting. Where the visual impact and the sensitivity of the asset are both exceptionally high, a views analysis may be required.”

The Guidance also lists:

- An archaeological assessment. Where there is potential for disturbing archaeological remains, it may be necessary to commission an assessment by a registered archaeological organisation or professionally-qualified archaeologist, preferably a member of the Institute for Archaeologists
- An assessment of potential risks and impacts, based on details in the Guidance, with corresponding precautions and works of mitigation.
- A financial justification. In general, proposals for temporary structures will be considered on their merits by local planning authorities, without the need for any financial justification. However, in some circumstances it will be necessary to demonstrate that the income generated by a temporary structure will be

used to benefit the heritage asset. This may be a critical factor where the benefits and disbenefits of a proposal are finely balanced.”

In the present case, the Cathedral will receive **no** benefit from the holding of the Market.