

Leadenhall, West Walk,
Salisbury Cathedral Close
PL/2024/00373
PL/2024/00720 (LBC)
Comments on behalf of the
Salisbury Cathedral Close
Preservation Society
February 2024

1.1 Introduction

This submission has been prepared by Alan Baxter Ltd, a design and historic environment consultancy, on behalf of the Salisbury Cathedral Close Preservation Society.

As this note will set out, it is our professional opinion that the applications PL/2024/00373 and PL/2024/00720 (LBC) will cause harm to the historic environment, including Grade I listed buildings and the setting of Salisbury Cathedral, and that the applicant has failed to provide the **'clear and convincing justification'** including supporting evidence required by the National Planning Policy Framework to demonstrate that this harm is justified and balanced by benefits that cannot be achieved in less harmful ways.

Second, the applications are a departure from **the Cathedral's masterplan** *An Exceptional Place* (2016) which was endorsed by the Planning Committee of Wiltshire Council in 2017 as a material consideration in the determination of applications.

For these reasons, as they have been uploaded, the applications are not compliant with Wiltshire Council planning policy and cannot be approved.

Further, from the application documents and from speaking to those present at a site visit on the 20th Feb 2024, it is apparent that the Grade I listed Leadenhall is in poor condition, with extensive water penetration, rot and collapsed plasterwork. Independently of the present applications and in advance of their determination, this should be urgently addressed to prevent further deterioration and irreversible loss of historic fabric. If necessary the authority should use its urgent works powers under S.54 to secure this.

1.2 Authors and methodology

Alan Baxter has been advising on the care, repair and adaptation of historic buildings for fifty years. In that time the practice has worked at a number of cathedrals and their precincts. The firm prepared a Conservation Plan for Salisbury Cathedral and the Close in 2005 and a masterplan in 2008 (prior to the present masterplan, *An Exceptional Place*).

For this submission, we visited the Close and met with members of the Society and have consulted a range of secondary sources and planning documentation. We have not visited Leadenhall or its grounds themselves but we have spoken to those who have and have the benefit of existing literature (including the RCHME volume), the DAS and other application documents. Our observations and comments are made with the benefit of this information; if we have relied on other parties this is made clear.

1.3 Relevant legislation and policy

Your authority will understand your statutory duties and the policy framework for determining these applications. For clarity in our submission, we highlight here the most pertinent of these, as well as the relevancy of the emerging Salisbury Neighbourhood Development Plan and the cathedral masterplan to which this refers and which is endorsed by Wiltshire Council as a material consideration.

The relevant legislation and policy includes your duty under S.66 of the Planning (Listed buildings and Conservation Areas) **1990 Act to 'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' when determining these applications.**

1.3.1 The National Planning Policy Framework (NPPF, 2023)

Para 200: the applicant to 'describe the significance of any heritage assets affected, including any contribution made by their setting.'

Para 203. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

Para 205. 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.

Para 206. Any 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.

Para 208. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use

1.3.2 Wiltshire Core Strategy 2015

Core Policy 57: Ensuring high quality design and place shaping: *A high standard of design is required in all new developments, including extensions, alterations and changes of use of existing buildings.*

Core Policy 58: Ensuring the conservation of the historic environment: *Development should protect, conserve and where possible enhance the historic environment.*

1.3.3 Salisbury Neighbourhood Development Plan

The emerging Salisbury Neighbourhood Development Plan (Regulation 14 draft) carries some weight in planning decisions. Policy 7 is relevant to this application:

Policy 7 The Close and its Liberty

All development proposals including planning applications and listed building consent applications should consider The Close as a single entity constituting the curtilage of Salisbury Cathedral and The Close Wall, both of which are Grade I listed and will be required to:

1. *Demonstrate within Design and Access Statements how such development takes account of the internationally distinctive character of the setting in which development is to take place.*
2. *Respect the predominantly residential character of The Close and the absence of commercial enterprises.*
3. *Protect and enhance the biodiversity, ecology and landscape setting of the Close*
4. *Avoid harm to the special character and distinctiveness of The Close as a place of tranquillity and contemplation, culture and learning.*
5. *Demonstrate outstanding design merit.*

... *Development proposals within the scope of the cathedral's masterplan An Exceptional Place will be treated favourably having regard to the SNDPs, NPFFs and the Local Plan's policies on the historic environment.*

1.3.4 Cathedral masterplan

Salisbury Cathedral has a masterplan entitled *An Exceptional Place* which was endorsed by Wiltshire Council planning committee in 2017 and is a material consideration in planning applications and listed building consent applications in the Close.

In these comments we will identify where the masterplan is relevant to these applications and contrary to it.

1.4 Condition of Leadenhall

Leadenhall is a Grade I listed building. This places it amongst the top 2% of all listed buildings in the country. In the Design and Access Statement applicants admit that the building is in poor condition, largely but not exclusively because of the uncontrolled ingress of water through failed rainwater discharge systems and roof coverings. The south end of the building is understood to be worst affected. The photographs in the DAS support this – illustrating extensive rot, damp and some collapsed ceilings.

We have been told by someone attending a site visit on 20 Feb 2024 that the condition of the building is worse than illustrated and that the historic plaster ceiling of the drawing room has partially collapsed. These are serious matters that should be addressed as a matter of urgency. The need for these urgent works is independent of any application for future use and the two should not be conflated; it may be many months or years before works for long term repair and conversion are undertaken, even if your authority determines to approve the application. In the meantime – without immediate action - the condition of the building will continue to deteriorate, and more significant historic fabric will be irreversibly damaged and lost.

We urge your authority to impress upon the Cathedral the importance and urgency of carrying out temporary works with immediate effect to prevent further water ingress. If necessary, your authority should use its powers under s.54 of the 1990 to enforce such works. If you were to grant the applications, these should be conditioned to require the applicant within a specified time to make the building wind and weather tight (such as a temporary roofing) and carry out regular inspections and maintenance works to an agreed plan and programme for a specified time period, until such time as permanent works are commenced.

1.5 Proposals

1.5.1 Leadenhall alterations: compliance with masterplan

In *An Exceptional Place*, Salisbury Cathedral sets out its desire to co-locate all staff in a single location (section 1.40). The application documents do not appear to provide any evidence to demonstrate that the proposals will provide accommodation for all staff. Without that evidence the proposals are contrary to aspirations of the endorsed masterplan.

The application documents do not contain information on what is proposed for the buildings that presently house office accommodation. These will be made redundant and those which are heritage assets, such as 6 The Close (GII*), risk becoming at risk without identified future uses.

Further, in the endorsed masterplan *An Exceptional Place*, Chapter sets out an intention to evaluate existing buildings owned by the Cathedral so that they are put to best productive use (section 13.4 part 3). The application contains no evidence that in respect of the buildings vacated by the relocation of offices to Leadenhall Chapter is honouring this intention. For example, there is no reference to a property portfolio strategy that is recommended in section 11.6 of the masterplan.

1.5.2 Archives building: harm to historic environment; departure from masterplan

This is a large new building in the gardens of Leadenhall that will be clearly visible from West Walk. Described as a single storey building, as shown in the drawings provided, it is in fact the size of a two-storey building, being taller than the parapet of Leadenhall.

There is no known historical precedent for a building in this location. By virtue of its location and size it will cause harm to the setting of Leadenhall and to the exceptional historical, architectural and landscape character of The Close, which forms the curtilage of and setting to the Grade I listed cathedral. According to the application documents, the foundations will cause harm to buried archaeology (see below).

In *An Exceptional Place*, Chapter identifies the proposed 'South Side Project' on the site of the present works yard as the preferred location for a new archive facility, or alternatively within another existing building (section 4.18 and 13.4). *An Exceptional Place* is endorsed by Wiltshire Council and is a material consideration.

The proposals are therefore contrary to this endorsed position and cause harm to the historic environment, but the application documents are deficient in the evidence required to justify this departure and the harm:

- There is no evidence, such as an options appraisal, to demonstrate that the public benefits of a new archive building can be met in ways that cause no harm or less harm to the historic environment, such as the two preferred options in the endorsed masterplan - the South Side Project or existing buildings.
- The application documents do not appear to include an assessment of any impact of the proposed archive building on the setting of the Grade I listed Cathedral, described in the list entry as 'probably the finest' of any English cathedral.
- The application documents do not demonstrate how the archives could operate independently of Leadenhall in the future, should the use or ownership of that building change. The proposed entrance to the archive for people and collections is via the Leadenhall forecourt and this is where priority parking is provided. A lack of independent access is contrary to pre-application advice from Historic England, intended to ensure future flexibility and safeguard investment in the archive and the harm it causes to the historic environment against changes in the function of Leadenhall which cannot be foreseen now.

1.5.3 Stephenson Hall: harm to historic environment; departure from the masterplan

Stephenson Hall and adjoining rooms and structures cause harm to the setting of the listed Cathedral, severe harm to the setting of the Grade 1 listed Leadenhall, harm to the character of the appearance of the Conservation Area, harm to the landscape character of the Precinct and harm to the views painted by Constable in his internationally known paintings of the Cathedral.

Harm was established by Wiltshire Council and English Heritage when the buildings were granted planning permission in 2002. That they still cause harm today is accepted by the applicant: the Heritage Statement says (6.29) '...these modern classroom buildings have no heritage value area (sic) are considered to be a negative feature of the setting of the listed building.' It follows therefore that Stephenson Hall, larger and taller than the classrooms, is at least equally harmful if not more so by virtue of its scale and height.

Such harm has to be balanced by public benefits to be acceptable in planning policy. Noting the exceptional heritage significance of this site and the assets that are affected and therefore the degree of benefit that is necessary to balance the harm, the application documents fail to provide adequate justification about any claimed benefits:

Firstly, in response to public consultation, the *An Exceptional Place* masterplan makes a public commitment not to create an auditorium in The Close (sections 1.35 and 8.3). The application documents provide no evidence that the views of the public, stakeholders and community and cultural groups in Salisbury have changed since 2017 in any way that would justify this departure. Therefore, the proposals are contrary to the masterplan endorsed by the planning authority and public opinion, and the identified harm cannot be justified as a public benefit.

Secondly, with regard to the educational use, following extensive analysis and public consultation, *An Exceptional Place* identifies the South Side Project as the preferred location of any new education facilities (1.22-1.25). The application documents provide no evidence (such as an options appraisal) to justify why these facilities should instead be located here, where they will cause harm to multiple historic assets.

Thirdly, the application documents lack evidence to demonstrate that the proposed uses – including education and events – have acceptable impacts in transport terms – such as parking, servicing, marshalling events and safe pedestrian movement for school parties moving between the Stephenson Hall and the cathedral.

Fourthly, setting analysis in the application documents, including views analysis, is woefully inadequate for such a highly sensitive site and shows no evidence of following industry best practice including Historic England's *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3* (Second Edition 2017). In particular there is no views analysis from the Constable painting locations to show the impact of the proposals. In light of the universally recognised exceptional cultural importance of these paintings and the landscape illustrated in them, such a views analysis conducted according to best practice advice and using Accurate Visual Representations (AVR) is essential and should be provided.

1.5.4 Landscape proposals: harm to the historic environment

Aspects of the landscaping proposals are inadequate and / or harmful to the historic environment:

- The proposals for the forecourt introduce a hard rectilinear shape to the road surface where historic mapping shows this has been softer and rounded since at least the mid nineteenth century. This change would be harmful to the setting of the grade I listed Leadenhall and to the character and appearance of the conservation area and no explanation has been provided as to why these parking spaces and EV charging points could not be located north of the screen wall where they would not cause this harm.
- Landscaping reinstated on the site of the classrooms should recreate the plan and planting shown in detail on nineteenth century ordnance survey maps. Such restoration would undo the harm caused to the landscape by the construction of the classrooms and Stephenson Hall and would enhance the setting of Leadenhall and the Cathedral and the character and appearance of the conservation area.

1.5.5 Archaeological impact: harm to buried and standing archaeology

Tim Tatton-Brown, former cathedral archaeologist and acknowledged authority on the archaeology of the Close and the Cathedral, has identified ways in which the proposals would or may cause harm to archaeology which we believe is of national importance. In particular, the possibility that cellars of the demolished medieval south wing survive and that the south screen wall that it is proposed to partially demolish to create access to the proposed archive building contains medieval fabric.

The county archaeologist should determine whether further evaluation is required to understand the potential impacts of the proposals on these and other aspects of archaeology before it can be determined whether those impacts can be avoided or acceptably mitigated.

1.6 Conclusion: determination of the applications, achieving public benefits in compliance with policy

In summary, case law, legislation and policy require that, when considering applications for change to the historic environment:

1. **'great weight' is given to the conservation of designated heritage assets**
2. harm to significance is avoided or mitigated through design
3. **any remaining harm requires 'clear and convincing' justification and must be weighed against the public benefits of the proposals (NPPF, 2023, paras 194-208).**

In this instance, 'great weight' is applied to the conservation of an historic environment of exceptional significance: Salisbury Cathedral and Close, including Leadenhall and the views painted by Constable, are internationally celebrated and important.

Secondly, these proposals would cause harm to the historic environment in a number of different ways, including the harm caused by Stephenson Hall to the setting of Leadenhall and the Cathedral (both listed at Grade I), and the character and appearance of the Close – a harm that is acknowledged by English Heritage / Historic England, you the planning authority and by the applicant – as well as harm to those same heritage assets caused by the proposed archive building.

Thirdly, the applicant has singularly failed to provide adequate evidence including **the 'clear and convincing' justification** required by the NPPF to balance the harm caused by the proposals. In particular, there is no views analysis from the Constable painting locations and no evidence (such as options appraisals) to demonstrate that less harmful means of providing improved archive and educational facilities do not exist.

Further, the proposed provision of education facilities, an archive centre and an auditorium at Leadenhall **are all contrary to the applicant's masterplan** *An Exceptional Place* (2016), which has been endorsed by your planning authority as a material consideration, and these uses of the site are proposed without adequate evidence to justify such significant departures from the masterplan.

Therefore, in our professional judgement – and on behalf of the Salisbury Cathedral Close Preservation Society – we believe the applications as submitted are contrary to planning policy including the Wiltshire Core Strategy and the emerging Salisbury Neighbourhood Development Plan and should be refused.

Instead, we urge your authority to encourage and support the Cathedral in pursuing improvements to facilities for the Cathedral, its community and its visitors through a holistic approach to future management of The Close that is compliant with the masterplan it prepared and you endorsed in 2017. Under the framework of that document there are solutions to the issues the Cathedral faces that all parties could support, and that would achieve the many public benefits the masterplan identifies in ways that would minimise harm and maximises lasting enhancements to one of the most precious and significant historic places in the country.

Alan Baxter

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