

OBJECTION TO: PL/2024/00373 and PL/2024/00720 (LBC): Change of use of Leaden Hall from education to offices and meeting rooms, facilities for events etc

Introduction

The submission of additional materials by the applicants on the one hand and additional examination of the application by the Trustees of the Society, with help from experts, simply reinforces our conclusion that the application seeks to use an ill-suited asset as an administrative, archive, educational and potentially entertainment venue when alternative options exist which the applicants have been urged to explore as part of a coherent, integrated strategic plan for the entire Close. This would be consistent with the increasingly sophisticated and strategic approach now being taken by a number of forward-looking Cathedrals which do not enjoy such a rich treasury of historical buildings and landscape as Salisbury:

1. In one of its early responses to the planning proposals, in a letter to Jackie Molnar, Chapter Clerk, Keri Dearmer of the Cathedrals Fabric Commission wrote urging:
 - Consideration of the development of the Cathedral Close as a whole, with a Master Plan for the precinct to help maximise the Cathedral's income.
 - Specifically pointed her attention to the planning and development being carried out by York Minster and suggested Salisbury Cathedral might do the same with the local authority ahead of the proposed new draft of the Local Plan due in early 2023. To the Society's knowledge, this was not followed up.

She also noted it was an "expensive" way to provide accommodation for office staff.

2. We note Cllr Hocking's undertaking that, should officers be minded to approve the application, it will be called in.
3. These comments should be read in conjunction with earlier submissions dated 23/2, 26/2, 18/3, 22/4 and 9/7/24. They respond specifically to the new documents posted on the planning portal in July. The new documents add little in terms of acknowledging and responding to the unique and sensitive qualities of the site.

In view of the serious threat to a landscape of national importance, the Society has taken professional advice and commissioned an experienced and distinguished garden historian, Kate Felus, to prepare an application to Historic England to place the Leaden Hall landscape on the Register of Historic Parks and Gardens. She notified Wiltshire Council of this initially on 21st July and a more detailed letter will follow shortly. **Trustees hope neither elected members nor officers would make a decision on these planning applications pending the outcome of the application for registration. Proposing consent to these applications without a full understanding of this landscape and a Master Plan that looks at the Close as a whole would risk irreparable damage to a building and landscape of national importance.**

To be absolutely clear: the Salisbury Cathedral Close Preservation Society welcomes the plan to carry out long-overdue repair works at Leaden Hall. It is one of the most important canons' houses in the Close and among a group of houses in the stewardship of the Chapter listed Grades I and II* (17 and 20 the Close, Hemingsby) which have been empty for some time.

The Society's objections relate to the insensitive and damaging interventions which, taken together, are likely to be very harmful to a site of immense cultural and aesthetic

significance. These interventions would be unnecessary were alternative, less harmful locations to be found for the administrative, archival and educational activities planned for the site. The options set out in the South Side visualisation remain a viable way forward as explained in the comments below. More specifically, they were designed as a starting point for discussion. We are disappointed that, to date, the Chapter has not taken up our invitations to do so, but the invitation remains open.

As previously, in developing our response we have drawn on the expertise of professionals and officials including:

- Richard Pollard of Alan Baxter Associates
- Kate Frelus, a landscape historian, whom the Society has appointed to apply to Historic England to put the grounds of Leaden Hall on the Register of Parks and Gardens of Special Historic Interest in England
- Tim Tatton-Brown, who, as Cathedral Archaeologist, was involved in previous works to Leaden Hall between 1990 and 2011 and has written extensively on Constable and the Close

Summary

The Society urges the planning authorities to reject the planning application in its current form.

Pending the outcome of these applications, the Society urges Wiltshire Council to secure the repair of the damage to both the house and grounds caused by lack of maintenance.

Following a review of the amended planning documents, the Society continues to believe the following key changes are needed:

- That any plans for the assets held by the Chapter within the Green Line (as submitted to the Cathedrals Fabric Commission) should be based on an updated strategic plan including a thorough review of all the Chapter's assets within the Green Line. This would be consistent with the good practice elsewhere – including at York Minster - as advocated by the Cathedrals Fabric Commission.
- The removal of Stephenson Hall, which was only granted planning consent because of the educational requirements of the school which occupied the site. The then architect was quoted as saying: "The architect points out that the ... new buildings are not designed to express permanence and could easily be removed (because of the method of construction) if the school ceased to occupy the site." (This was also said to Tim Tatton-Brown, in his role as Consultant Archaeologist, and the original siting of the swimming pool was changed because it was too close to the South-East Wing of the house.)
- Restoration of the grounds to the historic layout recorded in the numerous Constable paintings and the detailed 1:500 1880 Ordnance Survey maps of Salisbury.
- Elimination of the plans for solar panels in the grounds – particularly since the area demonstrably floods (cf the photographs taken in January 2024) and they will mar a well-documented historic landscape.
- Elimination of the plans for the archive building on this site.
- Plans for immediate remedial maintenance, over and above the minimal repairs executed to date, to prevent further deterioration of the house and garden.

Reasons for the Society's objections to the application in its current form

- The proposals for Leaden Hall, including the location of the archive building and the use of the Stephenson Hall for education (and other, public) purposes are fundamentally flawed because, despite the urgings of the Cathedral Fabrics Commission and Historic England, they do not derive from a thorough, updated strategic plan including a review of all of the Chapter's property assets.

- The application does not give sufficient consideration to the setting of Leaden Hall, either in terms of its grounds, or within the Close. The house is Grade I listed. It lies within the Close, which sits within a Conservation Area. The Constable paintings, which are predominantly focussed on views of and from Leaden Hall, have considerable bearing on the treatment of the Close. They make the Grade 1 designation of national importance.

- In the case of heritage assets, the Levelling Up and Regeneration Act 2023 requires that:

*(1) In considering whether to grant planning permission or permission in principle for the development of land in England which affects a relevant asset or its setting, **the local planning authority or (as the case may be) the Secretary of State must have special regard to the desirability of preserving or enhancing the asset or its setting.***

- Similarly, while there is mention of the Historic England Advice Note 12 2019 ie

An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

the plans do not give any weight to heritage assets of considerable cultural significance:

- The Society welcomes the paper on Constable. However, it gives an incomplete and, on occasions, inaccurate account of the Constable views. (See below.)
 - There is no attempt to recognise that Elias de Dereham not only designed the Cathedral, but Leaden Hall as a model canon's house. The now largely-demolished South cross-wing of Leaden Hall still has half-cellar below ground and fragments of the c 1230 chamber block of the Canon's house still survive, including important reset 13th century windows in the South garden wall. Tim Tatton-Brown is of the opinion that this area should be designated as a Scheduled Ancient Monument.
- The application diverges from the revised Master Plan of 2016 (*Salisbury Cathedral "An Exceptional Place"*), which was endorsed by Wiltshire County Council in 2017 in several important respects:
 - the Master Plan proposed that education facilities should be accommodated on the South side of the Cathedral alongside a smaller Works Department offering potential "synergy" between the two, a song school and possibly provision for the archive and display of the Magna Carta;
 - the Master Plan acknowledged that Wiltshire Council had advised it would not support an auditorium, not least because of the impact on other listed buildings and the Close overall. Feedback on the consultations indicated support for a larger auditorium than envisaged located in the city.

- The Society recognises that the Master Plan is dated and is keen to see it updated. However, this is no excuse for abandoning the Master Plan without due process. The Society encourages the Chapter to take a holistic approach to the planning, as urged by the Cathedrals Fabric Commission (in its letter of February 2022 to the Chapter Clerk Jackie Molnar) and exemplified by York Minster. This would facilitate a more coherent and strategic approach to issues such as sustainable energy, parking and the use of buildings. The current piecemeal approach means the application would cause needless harm because it largely fails to evaluate other options that may be available or the wider impact of the proposals:
 - Use of Leaden Hall as an office will leave a purpose-built office building (Wyndham House) empty. (The freehold is owned by the Chapter.) It would also leave a Grade II* building empty (6 The Close).
 - Creation of another auditorium will compete with other nearby venues, including the Medieval Hall, Sarum College and venues in the city.
 - Parking plans which do not take account of the current planning application to make the car park in the South of the Close permanent.
- There is a lack of evidence and/or material to support assertions (such as the scale of administrative staff accommodation required) or decisions that diverge from the 2016 Master Plan.
- There is no:
 - Explanation of how heavy construction traffic would traverse the site and, in particular, how it would reach the location of the archive building without causing damage to sensitive archaeological and landscape features, including the basement of the Elias de Dereham wing and the roots of the magnificent plane tree in the forecourt.
 - Adequate evaluation of the harm caused to the views painted by Constable. Eg the Archive Building would block the view captured by Constable in “A View at Salisbury from Archdeacon Fisher’s House”. (Conversely, there has been no attempt to restore views that have been harmed by previous development, such as by removing Stephenson Hall.)
 - Traffic plan in respect of the proposed uses of the Stephenson Hall for education or events.
 - Evaluation of the impact of loss of amenity, for instance, in relation to the impact of the archive building on the public appreciation of the landscape, views across the watermeadows from the much-used Town Path or the views of immediate neighbours.
 - Travel plan setting out how children using the proposed facilities in the Stephenson Hall will move safely from there to the Cathedral.
 - Examination of the expected lifespan of Stephenson Hall. The choice of construction was deliberate because it was not meant to suggest permanence.
- Removal of the planned lift is an improvement on conservation grounds. However, it will limit accessibility to the upper floors, which further calls into question the practicality of proposing to use Leaden Hall as an administrative and meetings building.
- It is not clear whether the Chapter has submitted a valid application: has the Chapter met the requirements of S29 of the Care of Cathedrals Measure 2011?
- The Fabric Committee still appears not to have been consulted?

- While the Society understands a floor loading requirement of only 1.5kN/m² may on occasion be acceptable for an historic building repair project, our concern remains about what might be required in practice in the case of Leaden Hall. Unless a Building Regulation authority has already confirmed that a 1.5kN/m² will be sufficient, the risk remains that more problematic strengthening of the floors would be required. Accordingly, if the Planning and LBC applications were to be approved, we would wish it to be on the basis that approval would be rescinded if it became evident that a floor load rating of more than 1.5kN/m² were required, with the consequence that further damage might be done to the fabric of Leaden Hall.
- Stephenson Hall had been built as a gym etc for Leaden Hall School. Its use has now ended and its existence is detrimental to the setting documented in Constable's paintings – particularly the view from across the River Avon. It dwarfs Leaden Hall itself. It is harmful to the view from the Longbridge, immortalised in Constable's painting "Salisbury Cathedral from the Meadows". It is also detrimental to the Close overall, which is the setting for the Cathedral. The proposed change of use should be turned down and Stephenson Hall should be removed.

Some Specific Comments

Construction Damage

There is little discussion of mitigation and protection measures for the site during construction: How will heavy construction traffic access the site – specifically the Southern part of the site where it is proposed to build the archive building – without risking damage to the medieval basement structures to the South West of the building, the archaeological remains of the medieval gatehouse under the East side of the forecourt and encroaching on the root protection area of the plane tree in the forecourt?

Leaden Hall

Floor loading

The applicant's Planning Consultation Response Paper 6 seeks to respond to questions about, *inter alia*, the proposed alterations to the floors of Leaden Hall and to provide further clarification on the proposals. It notes that the existing historic floors are insufficiently strong for their spans, and cannot support the equivalent of domestic floor loading, that is 1.5kN/m². It outlines its proposals to counter the floor loading issues, noting the view that they are common practice in historic building repair projects.

This response does not allay concerns we have expressed previously. In Section 5.6 of the Design and Access Statement the applicant notes that office space is usually designed to a floor loading in excess of 2.5kN/m². But it says that for Leaden Hall, a domestic loading of 1.5kN/m² has been agreed as appropriate, that this would require many of the primary beams to be strengthened and that the structural engineers have developed a strategy for this. In their letter of 21 March to the Chapter Clerk the structural engineers, AWA, added that they had considered the design loading appropriate for the future use of the building and that a 'domestic imposed load' of 1.5kN/m² had been adopted for the floor design to avoid unnecessary intervention in the structural fabric.

However, while a floor loading requirement of only 1.5kN/m² may on occasion be acceptable for an historic building repair project, our concern remains about what might be required in practice in the case of Leaden Hall.

Unless a Building Regulation authority has already confirmed that a 2.5kN/m² or greater rating would not be necessary, the risk remains that more problematic strengthening of the floors would be required. **Accordingly, if the Planning and LBC applications were to be approved, we would wish it to be on the basis that approval would be rescinded if it became evident that a floor load rating of more than 1.5kN/m² were required, with the consequence that further damage might be done to the fabric of Leaden Hall.**

The Master Plan: Paper 3

This document plays down the importance of the Master Plan noting that it is ten years out of date. It is. But the response should be to update it in line with current good practice rather than undertaking ad hoc interventions.

The South Side: Paper 4

The Society commissioned the South Side Visualisation work as part of its mission to encourage excellence in heritage estate management and, specifically, strategic planning for the Close. The purpose of the document, which the Society's then-Chair sent to the Dean in April, was to promote constructive discussion rather than being a finished product. The Chair invited the Dean and Chapter to join the Trustees for a roundtable discussion of the document. The invitation remains open.

The Archive Building

- The Society recognises the need to re-house the archive, but believes a building forming part of the South side redevelopment would be more appropriate and consistent with the Cathedral's Master Plan. This option would cause less harm.
- In view of the significance of the setting of Leaden Hall, both to Leaden Hall itself and the wider setting of the Close, there should be a presumption against further building on the historic gardens.
- Despite the assertions in the Heritage Statement and Design and Access Statement, the archive building is not "modest" in scale, nor is it "subservient" to Leaden Hall. The drawings showing the elevations of the archive building alongside Leaden Hall and West Walk House show that the size, scale and massing dwarf both Leaden Hall and West Walk House and completely alter the views from the West Walk and Marsh Close.
- The incorrect sightlines from West Walk House have not been corrected.
- There do not appear to be verified views of the impact: simply elevations. Verified views are needed from Marsh Close, the graveyard, the West Walk, the Broad Walk, the Town Path and West Walk House.
- What are the actual distances between Leaden Hall/the archive building/West Walk House's boundary?
- There is still no adequate archaeological survey to inform either the plan or the excavations on site.
- Dismissal of other potential sites on the grounds they lack potential parking is a spurious argument, since, in addition to the Tennis Courts car park, there is a substantial amount of parking in the city.

- As Historic England pointed out in its submission of 29/2/24, previous proposals for an archive building at Leaden Hall had included a “modest new building for the archive” which though “small and recessive...could be visually intrusive in such a highly sensitive and renowned historic context”. Historic England notes further that the revised proposal “The proposed building is a sizeable and prominent new addition in the close proximity of the Hall, and more generally in the Close.” If the original more modest proposal was deemed harmful to the setting, how much more is the considerably more prominent proposed archive building. In the circumstances, this approach seems perverse.

Landscape Master Plan: The grounds (Please see also the comments on Paper 8 on the Constable Views below)

The Society does not understand why anyone would choose gratuitously to cause harm to a historic landscape.

The plan ignores the points made in the Society’s earlier submission, notably, continuing to demonstrate an inadequate understanding of the historic layout of the grounds.

There are substantial and detailed records available including the National Library of Scotland on-line Ordnance Survey maps (<https://maps.nls.uk/os/townplans-england/salisbury.html>), useful files and photographs now kept in Historic England’s Historic Monuments Archives in Swindon and the extensive series of paintings by John Constable. (See the article by Tim Tatton-Brown in the Sarum Chronicle Issue 15 *The Gardens of the Leaden Hall*.) The 1880 maps (attached at Annexes A & B) show in detail the layout and planting of the grounds of Leaden Hall, together with the outline of the remnants of the Elias de Dereham wing.

As a result, the plans promote needless harm while failing to take advantage of opportunities for restoration. Specifically:

- Proposals for the reconfiguration of the forecourt of Leaden Hall would gratuitously destroy the historic layout:
 - There is space to create parking for people with disabilities through the Gothic arch to the North, with a substantial car park less than five minutes’ walk away. Why is it necessary, therefore, to remove a historic section of lawn to the North of the entrance driveway?
 - Eliminates the riverside walk shown in the 1880 maps and featuring in Constable’s paintings.
 - The retention of Stephenson Hall and proposals for a new garden layout around it cut across the landscape recorded in Constable’s paintings causing further needless harm.
- As regards the solar panels and ground source heat pumps:
 - The Society is not looking for an “ornamental garden” where the Landscape Master Plan is proposing to locate solar panels. Instead it is looking for a recognition that this was a well-documented fruit and vegetable garden.
 - It is not clear whether the Viewpoint Analysis of the visual impact of the solar panels is simply marked-up images or an industry-standard set of verified views? The former has no standing. The statement accompanying View 08 dismisses the significant impact of the solar panels on the views from West Walk House (which will also be very adversely affected if the archive building goes ahead).
 - In the case of the ground-source heat pumps, what protection is there for the water flows and to the archaeology on-site?

- The Heritage Statement includes the specific Historic England listing for the front wall and gates. The latter are in an advanced state of decay with missing ironwork. While the Society welcomes plans for repair of the walls and ironwork in the document *Existing and Proposed Entrance Gates*, there is no mention of how the missing arrowheads will be replaced on the gates.

Constable Views: Paper 8

- The Society welcomes an attempt to evaluate the impact of the proposed works on the Constable views. Unfortunately, the assertions in this paper are not entirely accurate. Nor are they supported by either verified views documentation or a landscape and visual impact assessment. One of the seminal books on this subject was Timothy Wilcox's book "Constable and Salisbury: the soul of landscape. The article by Tim Tatton-Brown ("The Gardens of Leaden Hall" in Issue 15 of the Sarum Chronicle) gives a very full description of Leaden Hall's grounds.
- The Society's concerns about the proposed developments are focussed on two issues in respect of the Constable Views:
 - The impact on the grounds
 - The impact on views both from and towards Leaden Hall and its grounds.
- It is mistaken to focus only on Leaden Hall itself. The grounds are of considerable merit and paintings from the early 19th Century provide a good record. Constable's great work "Salisbury Cathedral and Leaden Hall from the River Avon" which is at the head of the paper shows very clearly the layout of the grounds including the trees, shrubs and riverside walkway which is documented again in the 1880 map. However, for topographical purposes, the painting by John Dunthorne described by John Constable in a letter to Archdeacon Fisher (26/8/1827) as a "very pretty picture of your lawn and prebendal house" shows more of the house as well as giving a detailed view of the layout of the grounds viewed from across the River Avon. The proposed "naturalistic planting" at the riverbank will destroy the view into the grounds and the historic walkway alongside the River Avon.
- The photograph of Leaden Hall supposedly showing the current view is taken from further South. (This is evident from the view it contains of the Southern part of Leaden Hall.) The removal of the classrooms will go only part of the way towards rectifying the harm to the landscape if Stephenson Hall is retained. However, some of the now-large trees planted in the late 18th and early 19th centuries remain in place and there also remain both sufficient other planting and structures, as well as detailed records to facilitate a high-quality restoration of the landscape.
- The recreation of the "View at Salisbury from Archdeacon Fisher's House" illustrates all-too-well the scale of the proposed archive. The current view remains largely verdant. The tops of the trees shown in the painting are still visible in the photo in the South Canonry garden. If the archive is constructed, it will dominate and destroy the view, at least 80% of which remains despite the construction of the West Walk House. This view, according to Tim Tatton-Brown, was painted by Constable from Archdeacon Fisher's library.
- Constable's "Harnham Ridge and the Watermeadows from the Library" shows the open views across the lawns, past the "Great Alder" towards the Harnham Slope.

- The proposals for planting, for solar panels and the retention of the Stephenson Hall will do considerable harm to this view. (As of 2015¹, when Tim Tatton-Brown wrote about the grounds of Leaden Hall, an alder remained on the site. He surmised it was re-growth from the stump of the original alder.)
- The proposals to open up the South Side contained in the Master Plan would be difficult to implement unless it included segregation between the public and the Cathedral School. This would be necessary on safeguarding grounds but would have the effect of dividing the grounds of the Bishop's Palace.

¹ Tim Tatton-Brown, Sarum Chronicle Issue 15