

**REPORT OUTLINE FOR AREA PLANNING COMMITTEES Report No. 7a**

<b>Date of Meeting</b>	15 <sup>th</sup> November 2018
<b>Application Number</b>	18/06366/FUL
<b>Site Address</b>	Little Manor Nursing Home, Manor Farm Road, Milford, Salisbury, SP1 2RS
<b>Proposal</b>	External and internal alterations/refurbishments of the historic Grade II listed part of a 24 bed residential care home. Together with the demolition of the recent (non historically significant) extensions to the rear, and construction of a Care Quality Commission (CQC) compliant replacement extension, increasing capacity to 30 bed. Demolition of two ancillary buildings and associated landscape works and alterations to access (resubmission of 17/11250/FUL).
<b>Applicant</b>	Wessex Care Ltd
<b>Town/Parish Council</b>	Salisbury City Council
<b>Electoral Division</b>	Salisbury St Martins and Cathedral, Cllr S Hocking
<b>Grid Ref</b>	
<b>Type of application</b>	Full (and associated 18/06723/LBC)
<b>Case Officer</b>	Mrs. Becky Jones

**Reason for the application being considered by Committee:**

Cllr. Hocking has called the application to committee to be determined if recommended for refusal by officers, on the following grounds:

- The need for the development

**1. Purpose of Report**

To consider the above application and the recommendation of the Area Development Manager that planning permission be refused.

**2. Report Summary**

The main planning issues to consider are:

1. Principle and need for the development
2. Impact on the character of the area and the character and setting of the listed building.
3. Neighbouring amenity, noise and public protection
4. Ecology and Archaeology
5. Highway safety
6. Drainage and Flooding
7. Community Infrastructure Levy
8. Waste, Recycling and Energy Efficiency
9. Public Open Space
10. Conclusion

The application in its original form generated 10 letters of local concern/objection and one letter of support. None received from Salisbury City Council for 2018 application.

### 3. Site Description and Proposal

The site lies within the settlement boundary for Salisbury in an Area of Special Archaeological Significance, within Flood Zone 1. Little Manor is a Grade II listed building. A Grade II listed wall extends east from Milford Manor which is south of the site, to Milford Mill Road. Manor Farm Road is an unclassified highway and a public right of way (footpath SALS 74, maintainable by Wiltshire Council) runs to the south of the site along Milford Hollow.

The applicant is proposing to:

- Demolish 365sqm of the existing gross floorspace erected in 1980 at the rear/west of the site.
- Provide a replacement rear wing extension to the listed building to increase capacity from 24 to 30 beds. Proposed Total Floor Area 1100m<sup>2</sup> (Net increase 735m<sup>2</sup>) Three storeys with double pitch roof with flat roof to valley. Contemporary style.
- New extension would have external walls finished in, render and stained boarding and red brick with bonds articulated to provide interest. Dark grey powder coated metal windows and doors to extension. High performance flat roof materials and standing seam zinc on mansard roof slopes only.
- Etched bay windows to 1<sup>st</sup> and 2<sup>nd</sup> floor residents' rooms. Three pane (smaller panes) bays which have ALL panes (with potential neighbour overlooking issues) acid etched (ie no clear glazed windows looking out toward neighbouring properties). Only the return side lights have clear glazing and these windows have a 100mm opening restriction (H+S).
- Provide 2 additional parking spaces (4 increased to 6) and 10 cycle spaces and 1 disability space, with automatic gates to entrance. Bike shelter and smoking shelter.
- New red brick dwarf wall and metal railings to enclose courtyard to front of period building. Reinstatement of wrought iron gates at pedestrian entry to main entrance
- Refurbishment works to existing original listed building using matching materials.
- Removal of garage. Landscaping works. Provision of sensory garden
- Increase employees from 5 full time to 7.

Documents submitted:

- Planning Statement – including background to Wessex Care nursing and residential homes
- Design and Access Statement
- Archaeological Desk Based Assessment
- Waste Audit
- Heritage Impact Assessment and Statement of Significance
- Updated Care Needs Assessment Report
- Tree Survey and Arboricultural Impact Assessment
- Updated Ecological Appraisal - Bat and Nesting Bird Survey
- Schedule of Works to Listed Building

#### **Main changes made since the 2017 scheme (provided in full in Appendix 1)**

Most notably, the extension has been moved 0.6m further away from the boundary of No. 10 Westbourne Close, raised pleached trees and an intervisibility screen have been added as privacy screening for the Care Home residents and the occupiers of No 10 Westbourne Close and the building has been set 0.3m lower into the ground. A mansard roof introduced to the proposed replacement building/extension to lower the eaves level/visual height of the

building ('gutter level' now lower than that of the Listed Building) and clad with standing seam zinc cladding. Elevations below 'roof' of extension clad in stained timber down to top of Milford Hollow 'wall' level/ground floor accommodation. Off-set/angled bays replaced by 'stacked' projecting square bays with clear glazing to sides looking forward/backwards along flank of building and acid etched obscure glazing facing neighbouring properties to allow light for elderly/those with dementia.

**Planning History (a selection below from full list since 1949):**

1949/3894 Change of use from dwellinghouse to guest home for aged people AC

1974/385 Nursing staff quarters Refused 26.6.74. Appeal allowed 29.8.75

76/847 Residential staff quarters AC 15.2.77

S/1987/0909 and 910 1<sup>st</sup> floor extension and internal alterations AC

S/1991/1496 Change of use from private dwelling (bungalow) to nursing accommodation. AC

S/1996/0607 and 0608 Alterations and extension to ground floor to provide individual bedrooms and bathroom AC

S2004/1359 and 1360 Addition of residential bed unit and ensuite. AC

**17/11250/FUL and 17/11681/LBC External and internal alterations/refurbishments of the historic part of a 24 bed residential care home. Demolition of the recent extensions to the rear, and construction of a Care Quality Commission (CQC) compliant replacement extension, increasing capacity to 30 beds and alteration to existing access. Demolition of 2 ancillary buildings and associated landscape works.**

**Refused by Committee for the following reasons:**

- 1. The development seeks to remove modern extensions and to extend and alter a Grade II listed building comprising a 24 bed nursing home. The proposed extension and alterations would add six new bedrooms and other facilities, to create a modern, 30 bed nursing home facility. The listed building, despite its relatively poor quality extensions, is pre-eminent on the site and the present extensions are very much secondary and partially obscured from view from Manor Farm Road. The proposed extension is a substantial three-storeyed cranked range occupying a footprint that is significantly disproportionate to its host.**

**Whilst there are some elements of heritage gain within the proposals (such as the proposed stairs to the front door) and neutrality by removing the poor quality modern extensions and refurbishment works to the original building, the alterations to the historic core of the listed building (such as removal of masonry walls to the rear of room 3 and the kitchen) appear to result in the loss of historic fabric and are inadequately justified in public benefit terms as required by NPPF para 134.**

**Therefore, the proposed extension, by virtue of its overall design, height and footprint, would cause "substantial" harm to the character and setting of the listed building, contrary to section 16 and 66 of The 1990 Act and paragraph**

133 of the NPPF and the aims of Wiltshire Core Strategy Core Policy 58; and alterations to the historic core of the listed building would cause “less than substantial” harm and are inadequately justified in public benefit terms, contrary to NPPF paragraph 134.

2. The site lies adjacent to No 10 Westbourne Close, Milford Grove and White Lodge. The proposed 3 storey extension to the listed building, by virtue of its design, scale, massing and proximity to boundaries would result in an unacceptable level of actual and perceived overlooking towards neighbouring residential properties, is likely to give rise to unwanted light intrusion and would appear unduly dominant, to the detriment of the neighbouring occupiers, contrary to Wiltshire Core Strategy Core Policy 57 (vii) and paragraphs 9, 56 and 64 of the NPPF.

Since this decision, an appeal has been lodged and validated and the NPPF has been revised.

#### **4. National and Local Planning Policy**

##### **National Planning Policy Framework (NPPF Updated July 2018) and the NPPG**

##### **Wiltshire Core Strategy (WCS):**

Core Policy 1: Settlement Strategy

Core Policy 2: Delivery Strategy

Core Policy 3: Infrastructure Requirements

Core Policy 20: Spatial Strategy for the Salisbury Community Area

Core Policy 41: Sustainable Construction and low Carbon Energy

Core Policy 46: Meeting the Needs of Wiltshire’s Vulnerable and Older People

Core Policy 50: Biodiversity and Geodiversity

Core policy 51: Landscape

Core Policy 57: Ensuring high quality design and place shaping

Core Policy 58: Ensuring the conservation of the historic environment

Core Policy 60: Sustainable Transport

Core Policy 61: Transport and Development

Core Policy 62: Development Impacts on the Transport network

Saved Policy R3 Public Open Space (annexe D of WCS)

##### **The Community Infrastructure Levy Regulations 2010 (as amended)**

##### **The Conservation of Habitats and Species Regulations 2010,**

**EC Habitats Directive when as prescribed by Regulation 3(4) of the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended).**

**Circular 06/2005**

##### **Planning (Listed Building and Conservation Areas) Act 1990**

Section 66: Special considerations affecting planning functions

##### **Waste Core Strategy Policy WCS6.**

**Related:** The State of Health Care and Adult Social Care in England 2015/2016, The Care Quality Commission, 2016.

#### **5. Summary of consultation responses**

**Conservation:** objection

**Historic England:** no comment

**Waste:** No comment

**Public Protection** – no objection subject to conditions

**Highways:** No objection subject to conditions

**Ecology:** No objection subject to condition

**Public Protection:** No objection subject to conditions

**Archaeology:** Support subject to condition

**Rights of Way** – no objection subject to Informative

**Salisbury City Council** - *SCC objects to this application due to overdevelopment of the property and lack of street parking. SCC asks that Conservation Officer report be sought.*

**Wiltshire Council - Community Commissioning:** Support

**Community and Joint Commissioning Director and Group Director - N&E Wiltshire Group, NHS Wiltshire Clinical Commissioning Group:** Support

**The Chief Operating Officer, Salisbury NHS Foundation Trust:** Support

**Housing:** *Little Manor Nursing Home is classified as C2 "Residential Institutions," for which no affordable housing provision would be sought provided as there are no individual tenancy agreements.*

## **6. Publicity**

The application was advertised by site notice, press advert and neighbour consultation. Letter of objection from Salisbury City Council. The application generated 10 neighbour letters of concern/objection (including Willow End, Meadow View and Byways) on the following grounds:

- Existing parking problem will be increased. Traffic and parking along Manor Farm Road is already an issue, which will get worse if this facility is enlarged to such an extent. Delivery vehicles will use the pavement. Obstruction to passing vehicles, emergency services and residents accessing homes.
- Loss of privacy due to height of windows in the extension. Overlooking directly into upstairs bedroom windows. The residents will be seated and viewing our property for a large portion of the time.
- Planting needs to provide all year round privacy
- Modern style of building out of keeping with Milford Area. Too imposing and will not enhance the area. The visual impact of the proposed extension is a different type of building to small historic house with smaller, lower extension; the proposed building is more like an office block.
- Increased night time light pollution
- There has already been a significant increase in the provision of care home beds close by in Tollgate Road and there is another care home opposite Little Manor and

one a short walk away on the Petersfinger Road, this could be considered to be an over provision of care facilities for one small area.

- **10 Westbourne Close** - building that is still very close, seriously affecting privacy. The attempt to screen the building, together with the bulk of the building itself, will completely enclose and dominate our private grounds, which are now open and full of light. Of particular concern is the overshadowing of the outside patio area closest to the house, and the positioning of the proposed upper terrace with double sets of French doors from the lounge overlooking the sensory garden AND our upper windows. The large upper terrace would be very close to our property. There is of course, a further level above with a bedroom window in sight line. The proposed building will be particularly close to us and will be overbearing from all the rooms at the rear of our home. The mass of the development will have a considerable impact on our amenity space. ( Ref : Core Policy 57 ( point vii ). Our garden is dark at night at present and we are very concerned about the light pollution from the proposed building, with inevitable 24 hr illumination in some areas. While we appreciate the need for development of this site, we consider that the revised proposal is unacceptable because of the very significant intrusive effect on the whole of our property, in terms of privacy and dominance, thus diminishing our residential amenity.

**Amended Plans have been received and further comments from No 10 Westbourne Close are as follows:**

- **Windows.** It is very unclear exactly how many and what size the 'stacked bay ' windows overlooking our garden will be. (Ref 308C west elevation, 306C N/W elevation and 300B Revised Site Plan). From one view they look large and very prominent which will bring them much closer to our garden. The sides of the 'stacked bays ' are clear glass.
- **Trees.** Ref 306C Outline of non existent trees still shown.
- We would definitely welcome a visit from committee members so they can appreciate the true impact on our property but we think it is VITAL that the outline of the proposed build is marked precisely on the ground. Without this, it is very difficult for anyone to visualise the extent of the build and how it relates to residential amenity Core policy 57 vii
- **Rosemead** - Development will not encroach close to Rosemead, but splayed wall is requested at bottom of driveway, to enable unrestricted view to towards Shady Bower and Milford Mill Road junction.
- **8, 10, and 12 Manor Farm Road.** Living dining room windows would focus their view directly at the windows and gardens of 8, 10 and 12 Manor Farm Road. Can the height of the boundary wall be increased to reduce this? Also could trees be planted in the strip of council owned land beside the bungalow and between the Manor boundary and the Manor Farm Road houses? The residents will spend a large amount of time seated, looking out of the windows which is unlike a 'normal suburban

residential environment' where people are busy in and out of the house, not spending the majority of the day looking directly into windows and gardens opposite.

- **11 Westbourne Close** - the height and close proximity to neighbouring properties of the proposed extension will mean that it will both dominate and overshadow the gardens of such properties, and as such this represents an unneighbourly form of development that would have an adverse impact on the amenity of neighbouring properties by reason of an overbearing effect.
- **White Lodge** – roof line is a valid change, however major concerns remain. The upper floors and roof of the proposed building continue to look incongruous alongside the main house and the connecting glass corridor will become a light emitting intrusion. The proposed modern roof and windows will draw attention rather than blend in. Final building must sit comfortably in surroundings.
- **Milford Grove** – stance remains unchanged as per original objection letter. Serious concerns regarding visual, audio and aesthetic impact of the development and impact on property. Slightly changed roof, acid etched opaque glass and minor changes are helpful but proposed structure remains incongruous from south/south west of site. Still a major rebuild in semi-rural setting. Resembles office block or factory in a box shape. Current building is sympathetic enough to setting, proposed new build is not. Must already be CQC compliant? Intrusive and incongruous.

#### **Milford Preservation Group – Support.**

*This application is a refinement of an earlier bid (ref 17/11250/FUL) that failed to convince Salisbury City Council's Planning Committee of its merits. The new proposal represents a further improvement of the building on Manor Farm Road, and especially the construction of better vehicle access and parking facilities that would reduce the present hazards to drivers and pedestrians in the immediate area. The Milford Preservation Group fully supported the original application, and maintains its support for the revised version, which, when approved, will further help to meet the growing demand for up-to-date care facilities in the Salisbury area.*

#### **7. Planning Considerations**

Planning permission is required for the development. The application must be determined in accordance with the development plan unless material considerations indicate otherwise. (Section 70(2) of the Town and Country planning Act and Section 38(6) of the Planning and Compensation Act 2004).

The revised NPPF confirms in para 11 that plans and decisions should apply a presumption in favour of sustainable. For decision making, that means approving development proposals that accord with an up-to-date development plan without delay. where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date<sup>7</sup>, granting permission unless:

the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed<sup>6</sup>; or

any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

The NPPF also states that the policies in the Framework are material considerations which should be taken into account in dealing with applications from the day of its publication. However, existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given). (para 202 and 203).

## **7.1 Principle of the development and need**

Core Policy 1 outlines the settlement strategy for Wiltshire and identifies the settlements where sustainable development will take place. Salisbury is listed as a Principle Settlement within the Salisbury Community Area. Core Policy 2 addresses the issue of development within settlement boundaries:

*Within the limits of development, as defined on the policies map, there is a presumption in favour of sustainable development at the Principal Settlements, Market Towns, Local Service Centres and Large Villages.*

The proposed development would affect an existing residential institution within the settlement boundary is therefore acceptable *in principle*. The proposal is also subject to the other policies and provisions set out in the development plan and NPPF.

**Core Policy 46**, Meeting the needs of Wiltshire's vulnerable and older people, states:

*The provision, in suitable locations, of new housing to meet the specific needs of vulnerable and older people will be required. Wherever practicable, accommodation should seek to deliver and promote independent living.*

### **Specialist accommodation**

*The provision of sufficient new accommodation for Wiltshire's older people will be supported, including:*

- i. Nursing accommodation*
- ii. Residential homes and*
- iii. Extra care facilities.*

*[Proposals for extra care accommodation to be sold or let on the open market are not considered exempt from the need to provide affordable housing. Therefore proposals for extra care accommodation will be expected to provide an affordable housing contribution in line with Core Policy 43.]*

Members will note that the proposed accommodation affects a residential institution and not open market housing. The new housing team have commented again regarding need:

### **Need**



The Care Accommodation Assessment looks at quantitative need for additional care in the local area, including projected levels of need in 5 and 10 years' time, and a qualitative assessment of accommodation currently on offer in the home and benefits from the development. In summary:

- The population of people aged 65 plus within the catchment area is set to increase from 26,200 persons in 2016 to 30,790 by 2026, an increase of 4,590 in the next ten years.
- There are 3,780 people aged 85 years or over within the catchment area as at 2016 and this is set to increase to 5,320 by 2026. This age group has the highest likelihood to require long term residential care.
- The numbers of people aged 65 years plus identified as requiring care will increase from 1,036 in 2016 to 1,359 by 2026
- The data shows that there is currently a supply of 1136 care bed spaces in the catchment area
- Of the existing care accommodation within the catchment area approximately 135 of bed spaces are in shared rooms and additionally a number of single bedrooms are not en-suite or less than 12 square metres in area, which are no longer supported for new registrations under current care home accommodation standards (the regulations state that when a space becomes available in a shared room the remaining occupant should have the choice of whether or not to continue sharing, so many shared rooms are in fact occupied as singles). If double rooms are changed to single rooms in the future, and/or rooms that do not meet the standards in order areas fall out of use there is likely to be a growing shortfall in accommodation over time.
- By 2026, assuming no other developments come forward, there is a projected potential shortage of at least 295 bed spaces in the area.
- The actual shortfall of care accommodation is likely to be even higher, because the above figures reflect need for long term care accommodation, and do not take account of respite and rehabilitation care, on which there is increasing emphasis.
- The additional bedrooms proposed to be provided at Little Manor can contribute towards addressing this projected shortfall in care accommodation.

The Housing Team *previously* provided the following details for the 2017 scheme:

*There are currently 672 bed spaces across 17 care homes providing a range of residential and nursing care in the Salisbury Community Area. The Older People's Accommodation Development Strategy [2010] sets out the need for an additional 80 bed nursing home and a 64 bed care home for people with dementia in the Salisbury community area. There is and will be significant demand for older people's accommodation in the Salisbury area [as with the whole county] with the projected population figures showing a steep increase in older people with the percentage of the population in Wiltshire aged 65 or over reaching 22.6% by 2021. This represents a 32% increase in the number of people over 65 in Wiltshire from 2011. The number of Wiltshire's residents aged over 85 years is projected to increase from around 12,000 in 2011 to over 17,000 by 2021 (42.4%).*

**Wiltshire Council Commissioning** team support the latest proposal and stated:

*I would like to express my continued support for the above planning application. Wessex Care have a 5-year development plan to rebuild their services to ensure they are fit for purpose for the next 20-30 years, and the alterations at Little Manor are part of this overarching plan, with the home due for completion in March 2020.*

*Adult Social Care currently has a large block contract with this provider for the provision of care home beds (currently 130 beds), and, on behalf of the Council and the Wiltshire Clinical Commissioning Group, also currently commissions a intermediate care beds, to support people who have had an acute hospital admission, or who may otherwise be admitted to hospital unnecessarily. The new building will ensure that services remain fit for purpose in the future, and can accommodate people with more complex and specialist needs.*

*The Council's ability to provide care for Wiltshire residents should see a significant benefit from this re-provision and expansion of beds in Salisbury.*

**The Community and Joint Commissioning Director and Group Director - N&E Wiltshire Group, NHS Wiltshire Clinical Commissioning Group has also stated:**

*I would like to express my support for the above planning application. Wessex Care have a 5-year development plan to rebuild their services to ensure they are fit for purpose for the next 20-30 years, and the alterations at Little Manor are part of this overarching plan, with the home due for completion in March 2020.*

*Wiltshire Clinical Commissioning Group, with the Council, currently commission intermediate care beds to support people who have had an acute hospital admission, or who may otherwise be admitted to hospital unnecessarily. The new building will ensure that services remain fit for purpose in the future, and can accommodate people with more complex and specialist needs.*

*The CCG see a significant benefit from this re-provision and expansion of beds in Salisbury to support those who need further care and support.*

**The Chief Operating Officer, Salisbury NHS Foundation Trust**

*Capacity outside of the hospital is key to discharging patients in a timely manner. We work closely with other care providers to align capacity and to this end Salisbury NHS Foundation Trust Hospital fully support the planning application submitted by Wessex Care. This will provide more capacity to discharge patients allowing the acute hospital to treat critically ill patients.*

The development would therefore comply with Core Policy 46.

## **7.2 Impact on the character of the area and the character and setting of the listed building.**

**Core Policy 57** considers design and place shaping and requires a high standard of design in all new developments *including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complimentary to the locality.*

The Little Manor is a Grade II listed building and the development would affect its curtilage and setting.

There is a duty placed on the local planning authority under section 66 of the Planning (Listed Building and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects a listed building or its setting to have special regard to the desirability of preserving the building and its setting.

Paragraphs 189, 190, 192-5 of the NPPF state:

*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.*

*Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.*

*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.*

*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.*

*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. Substantial harm to or loss of:*

*a) grade II listed buildings, or grade II registered parks or gardens, should be **exceptional**;*

*195. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.*

Public benefits may include heritage benefits, such as:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset

- securing the optimum viable use of a heritage asset in support of its long term conservation

Core Policy 58 aims to ensure that Wiltshire's important monuments, sites and landscapes and areas of historic and built heritage significance are protected and enhanced in order that they continue to make an important contribution to Wiltshire's environment and quality of life. Heritage assets include listed buildings and conservation areas. Development should protect, conserve and where possible enhance the historic environment. Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance.

The submitted Heritage Impact Assessment concludes:

*3.1 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 confers a strong presumption for development to preserve the setting of listed building, and the courts have reminded that this must be given considerable importance and weight in the planning balance. In exceptional cases, however, the presumption may be overridden in favour of development which is desirable on the grounds of public interest.*

*3.2 Aside from other potential public benefits that may accrue as a result of the development, there would be heritage benefits through the removal of the unsympathetic additions to the building and the restoration of the building's frontage.*

*3.3 However, it is acknowledged the proposals would result in some loss of spaciousness within the site that contributes to the setting and in turn the significance of the listed building.*

***3.4 Overall, however, due to the judicious planning, design and materials of the proposals, there would be 'less than substantial harm' to the listed building under the terms of the NPPF. As such, and in accordance with paragraph 134 (now 196) of that document, the harm should be weighed against the public benefits of the proposals, including rectifying some of the harmful interventions of the past while securing the building in its optimum viable use.***

Historic England has made no comment on the proposal. The Conservation officer has stated:

*I've had a careful look through the proposals and considered the impact on the listed building and its setting. I'm afraid I can see nothing that would reduce the concerns raised by the previous application, and the same reason for refusal would be appropriate.*

On the basis of this response, the proposed revised scheme is still perceived to be institutional in character and appearance, and although the existing buildings and extensions on the site are somewhat ramshackle in appearance, they have managed to retain the setting of the main building and are relatively unobtrusive within their surroundings and the streetscene. This is probably because they are mainly subservient, and of a simplistic, traditional design approach, with pitched roof details and matching brick and tile materials. This is a sentiment echoed by several third parties.

The proposed extension still presents a strident, contemporary design, which is more institutional in appearance and will create more prominent building than the existing listed building, particularly due to its rather uniform scale and design. This would be at odds with the existing modest character of the listed building, to the detriment of its setting. The scale of the proposed building would not seem to reflect the simple, small scale of existing

development in the immediate area. The existing outbuildings are simply designed, subservient and they manage to retain the setting of the main building. The proposals would impact on the predominantly modest residential nature of the area, the character of which contributes to the existing informal setting of the listed building.

For these reasons, officers consider that the proposal would be contrary to CP57, CP58, the NPPF para 194 and 195 and S66 of the 1990 Act.

### **7.3 Neighbouring amenity, noise and public protection**

The proposal has generated 10 letters of concern/objection and the case officer has previously visited some of the properties immediately adjacent to the site. Some neighbours are concerned about the impact of increased light pollution at night and also potential noise disturbance from windows. There are also concerns about the impact of the development on privacy, including the increased prominence of the building and potential overlooking into and towards neighbouring properties.

Core Policy 57 sets out the general principles for the design of development, including impacts on neighbours. It states:

*A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complimentary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through:*

*vii. Having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing; vibration; and pollution (such as light intrusion, noise, smoke, fumes, effluent, waste or litter).*

The public protection officer has considered the scheme in relation to neighbouring properties and commented as follows.

*Previously this department made comments on application; 17/11250/FUL. As well as recommending conditions, we had concerns in relation to a floor to ceiling glass walkway connecting the old and new buildings. It is apparent that this has now been removed from the plans. Therefore, whilst we do not have any significant concerns with the proposals, we would recommend the conditions below are attached to any approval granted.*

*The applicant has stated that there is no requirement for an extraction system. However, if other externally mounted plant is proposed (air con units/ventilation systems etc) we would recommend that conditions are attached to any approval of this application to control noise emanating from any future equipment, prevent burning of waste, control hours of construction/demolition and provide a dust management plan to manage dust during demolition.*

The closest neighbours are still concerned about light pollution and noise (including noise from room buzzers) emanating from the windows, which would have some restricted opening. The public protection officer has looked again at these issues and considers that the plans have been altered to reduce the light impact and that the roof lights would have

black out blinds. Furthermore, it is considered unlikely that the sound of buzzers would be loud enough to cause disturbance outside.

The impact of the development in terms of dominance and loss of privacy have also been considered in relation to CP57 (vii):

### East – Meadow View, Bourne Cottage and Corner Cottage

These properties face towards the site (see impression below) and have access onto Manor Farm Road. These dwelling would be sited more than 40 metres from the north east corner of the development and so the occupiers would not be adversely affected in terms of dominance or overlooking. The revised site access would be in close proximity to these properties, but the highways team have raised no objections to the proposals.

#### Refused scheme



#### Revised scheme



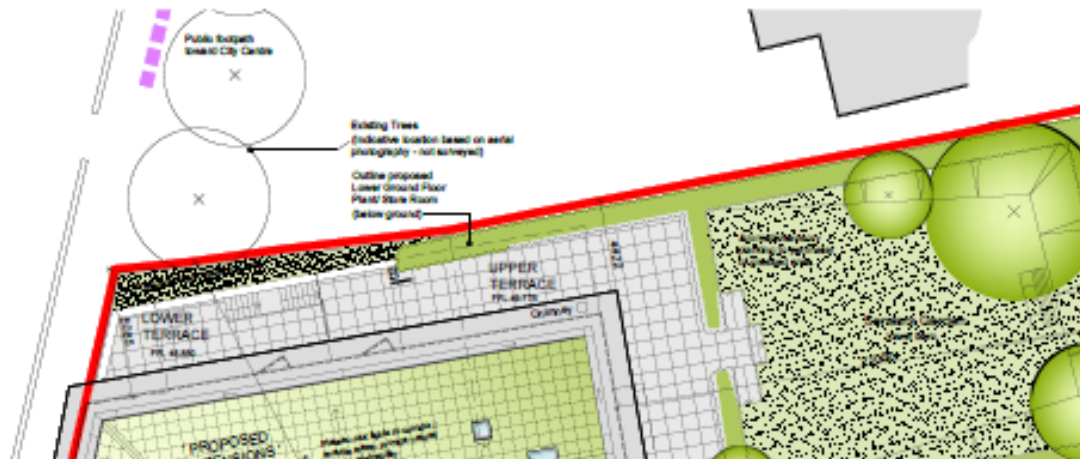
### North – Rosemead

This property (shown above in relation to the extension) is a single storey bungalow with an access to the side of the nursing home. The corner of the proposed extension would be less than 4 metres from the bungalow. This bungalow has one west facing dormer, which would face obliquely towards the proposed Upper Terrace for the lounge/dining rooms. This relationship would enable some direct/oblique overlooking into the dormer from users of the terrace. However, most of the private spaces for this property are apparently sited away from the development, to the front of the bungalow and to the north corner. Therefore, whilst the extension will appear dominant when viewed from this bungalow, the relationship is considered to be acceptable, on balance.

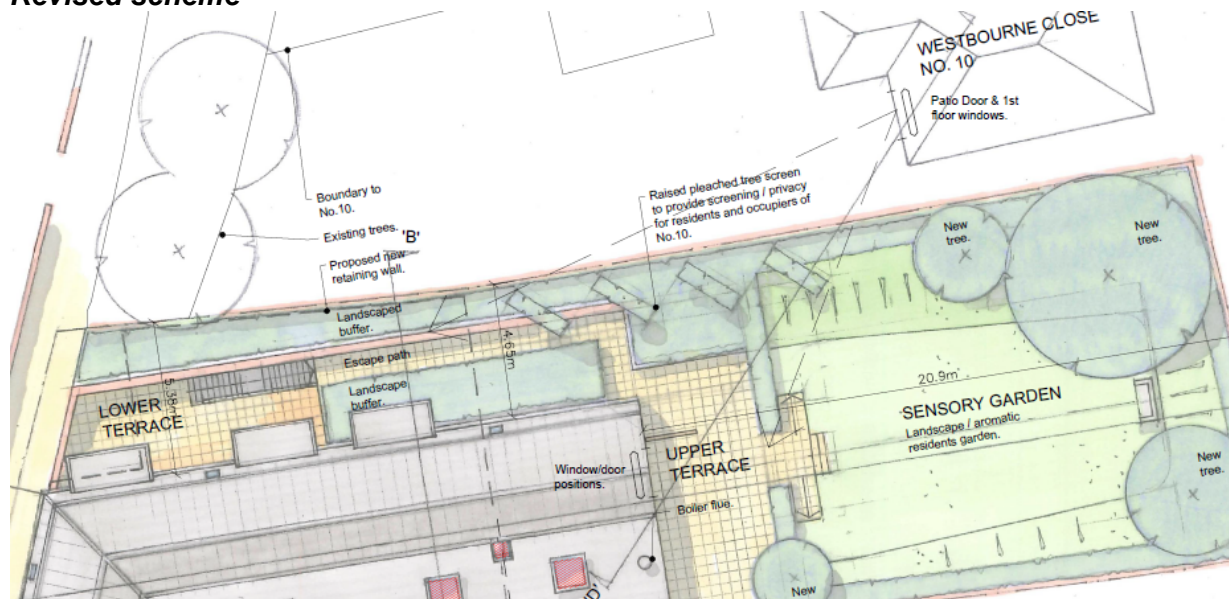
The occupiers of Rosemead again responded to the latest consultation with a request for the east boundary wall to be pulled back, to give them better sight lines. The highways officer is satisfied that Rosemead will have more than sufficient sight lines for their access.

## West - 10-14 Westbourne Close

### Refused scheme



### Revised scheme



The development would increase the present scale and bulk of development along the west boundary with No 10, in particular. The private areas of this property, including the garden, small patio area and french doors to the lounge face directly towards the proposed north elevation of the development, and the proposed west elevation would run parallel and in close proximity to the garden wall boundary between the properties. The existing nursing home currently presents modest elevations towards this property.



Existing views from bedroom



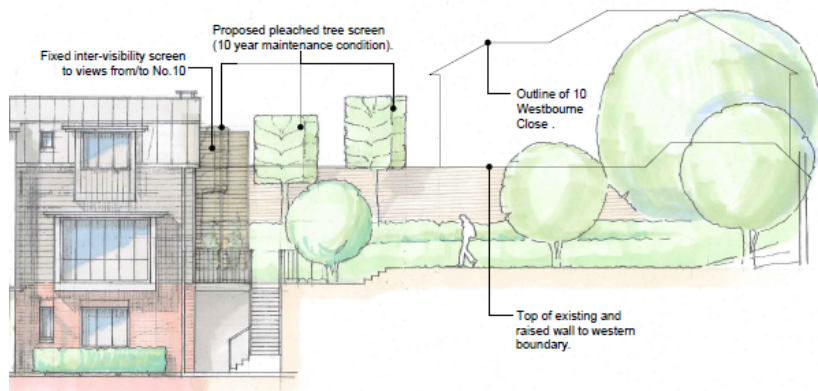
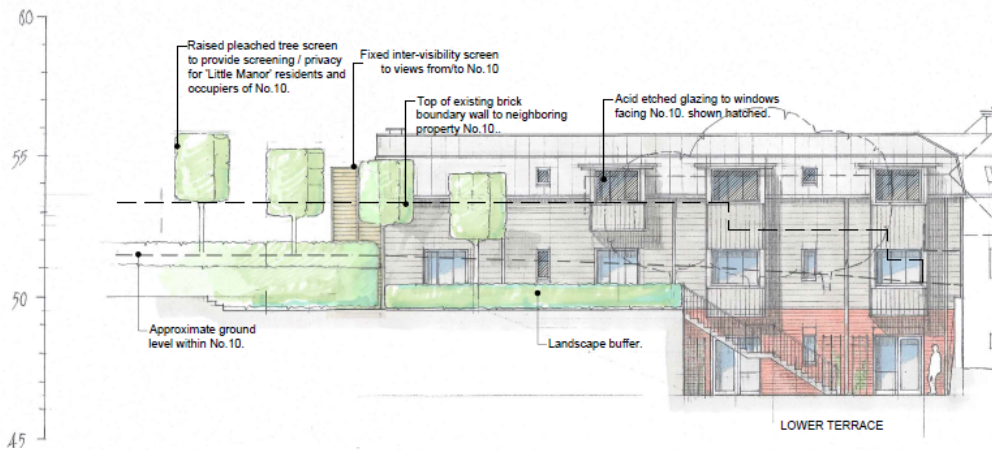
and living room French doors/patio



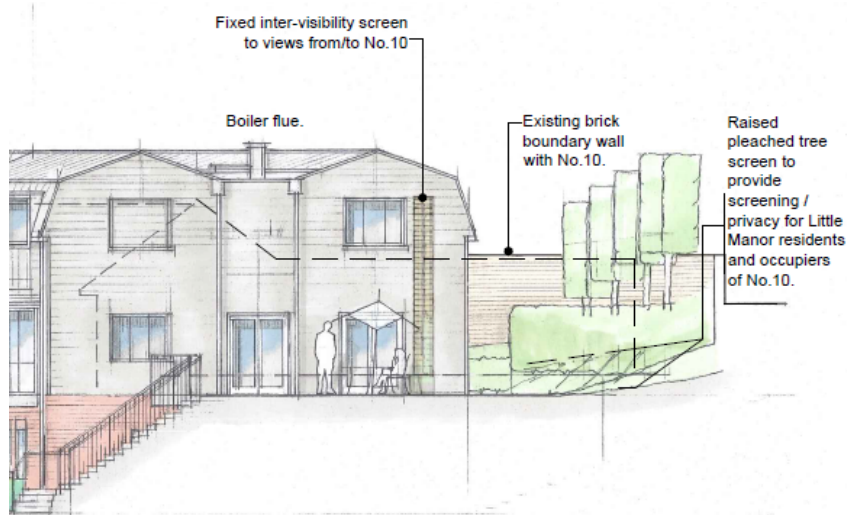
**Refused scheme**



**Revised scheme**

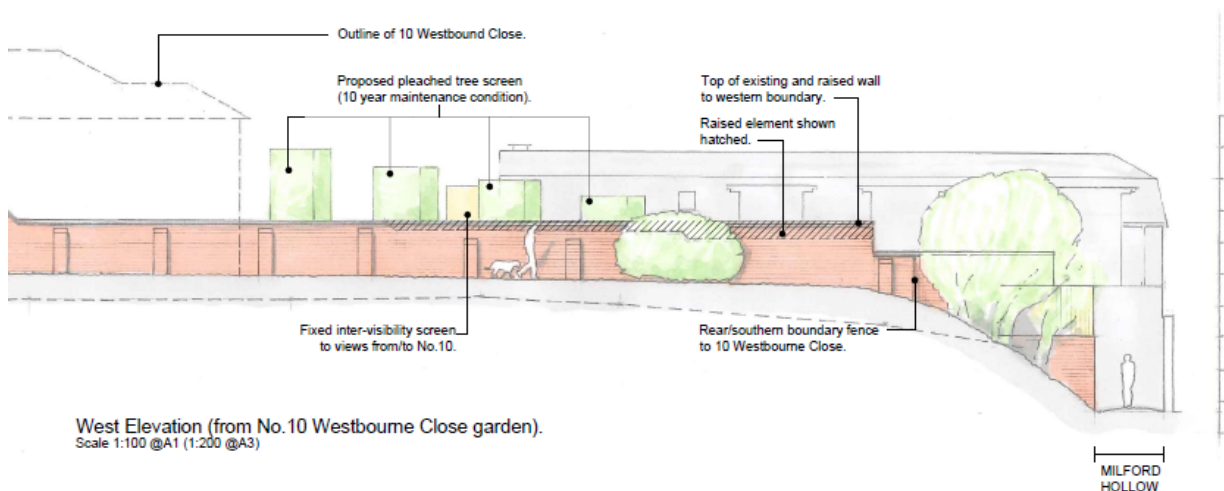
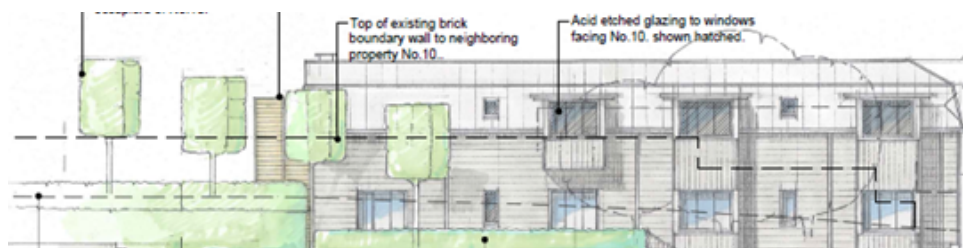






The applicant has gone to lengths to reduce the possibility of inter visibility and overlooking between the north elevation first floor windows and ground floor patio area, as shown above. Officers are satisfied that appropriate levels of *privacy* for the occupiers can now be achieved by the development, as presented on the *north elevation*.

However, the proposed development, in increasing from a single storey bungalow with a pitched roof to a vertical structure with at least two storeys and three large, etched windows being *visible* from the garden, the development still likely to appear dominant and intrusive when viewed from No 10 and its garden:



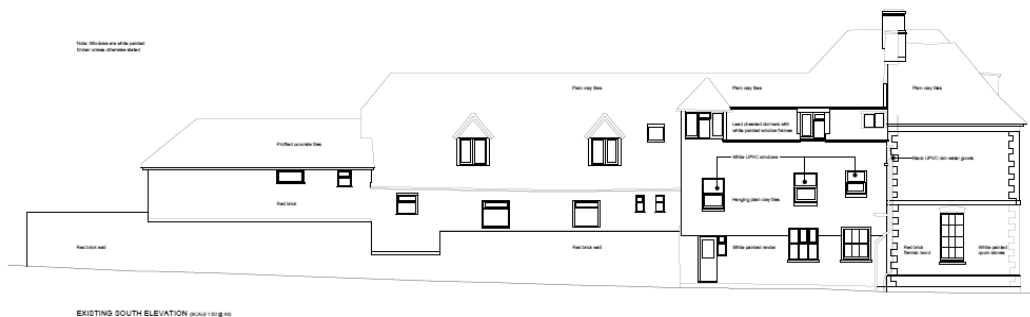
### South – The Corner House, White Lodge, Milford Grove

The north elevations of these dwellings are approximately 12m, 35m and 34m from the south boundary wall of the nursing home. The Corner House is oriented in such a way that the development is unlikely to have a detrimental impact on the occupiers. Its garden and

living areas are sited to the south, away from the development. Two windows and a garage/parking area only would be affected, but whilst the development would be visible, no likely harm to amenity is perceived.

Concerns have been expressed regarding the change in the appearance and character of the development, which is presently visible at the end of the gardens for White Lodge and Milford Grove. Concerns centre on the change from a large expanse of a tiled pitched roof to provision of a third storey with a mansard style roof, the increase in the number and scale of the windows (dominance, noise and privacy), and light intrusion from the glazed link.

**Existing south:**



**Refused south:**



**Revised south:**



Despite the significant changes to the design, it is still considered that the change in the roof shape from a steeply sloping pitch to a vertical wall with a small pitch is likely to result in a significant increase in the dominance of the nursing home in relation to these properties.

Presently, there are four dormer windows on a sloping roof facing the gardens. This would be replaced with six etched windows, on a vertical elevation.

*Current views looking north from White Lodge and Milford Grove gardens*



Whilst the smaller of the two panes would be obscure glazed for privacy, the increase in windows and their position on a vertical wall is likely to increase the perception of and actual overlooking of (from the small panes) into the properties and gardens to the south of the development. The windows are also likely to appear intrusive.

*The revised NPPF para 127 states that planning policies and decisions should ensure that developments:*

*a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

*b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

*c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

*d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

*e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*

*f) create places that are safe, inclusive and accessible and which promote health and well-being, with a **high standard of amenity for existing and future users**<sup>46</sup>; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

The adverse impacts of the development on amenity are considered to be contrary to CP57 and the NPPF for the reasons described and the harm that would be caused to residents in amenity terms is not considered to be outweighed by the need for this development in this particular location, given its scale and form.

## **7.4 Ecology and Archaeology**

## Ecology

The NPPF para 175 states that when determining planning applications, local planning authorities should apply the following principles:

*a). if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*

The NPPG also sets out guidance. **Core Policy 50** seeks to ensure that all development proposals incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.

A bat and nesting bird survey has been submitted and concludes that:

- No evidence was found for use of any of the buildings by bats during the daytime survey/assessment.
- The site does not otherwise appear suitable for material use by bats for foraging or commuting.
- No bats were seen to emerge from, enter or show any particular interest in any of the buildings during any of the dusk/dawn watches.
- Local bat activity during the dusk/dawn watches was limited to a small number (<10 passes per watch) of foraging or commuting passes by individual Common pipistrelle bats, mostly along the adjacent lane (to the southwest) or over neighbouring gardens (to the west).
- No evidence was found for birds having nested recently within or upon any of the buildings.
- There is a low risk of common birds nesting within various shrubs in the formal garden area.
- No other evidence was found for use or likely significant use of the site or immediately adjacent land by protected species. In this regard we note that:

- i. the location is suburban – there are no adjoining ‘natural’ or semi-natural habitats;
- ii. there are no ponds present upon the site or apparent in the immediate vicinity.

Recommendations:

4.5. No further bat survey is warranted.

**4.6i. any removal of shrubs/trees be carried out between October and February inclusive (so as to avoid the nominal bird nesting season) or otherwise only following a thorough check to confirm that no active birds nests are present at the time. Should birds start to nest within or upon the buildings at any time then all works liable to impact upon such nests should be delayed until the nests are no longer occupied.**

Other than the above, the applicant’s surveyor saw no need for any further ecological survey in relation to the proposed works. The Council’s ecologist previously considered the report and raised no objection, subject to the development being implemented in accordance with the above recommendation, by condition. In conclusion, on the basis of the survey recommendations, the development is considered to pose a negligible threat to protected species and no objection is raised to the development and the proposed mitigation, in

accordance with Core Policy 50, the NPPF, guidance in the NPPG and the ODPM circular 06/2005.

## **Archaeology**

Core Policy 58 aims to ensure that Wiltshire's important monuments, sites and landscapes and areas of historic and built heritage significance are protected and enhanced in order that they continue to make an important contribution to Wiltshire's environment and quality of life. Heritage assets include Listed Buildings and Conservation Areas.

The Archaeologist has considered the NPPF and stated:

*This site is of archaeological interest as it lies close to the historic core of the medieval settlement of Milford. There are also other HER records in the vicinity, including to early post-medieval listed structures. There is therefore potential for archaeological remains to be present on the site. Therefore in line with the NPPF (2018), PPS5 (2010) and the earlier Planning Policy Guidance Note 16: Archaeology and Planning (DoE 1990) the following recommendations are made: Standard condition requiring a written programme of archaeological investigation which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved by the Local Planning Authority. The approved programme of archaeological work should be carried out in accordance with the approved details, to enable the recording of any matters of archaeological interest. The work should be conducted by a professional recognised archaeological contractor in accordance with the written scheme of investigation agreed by this office and there will be a financial implication for the applicant. In this instance, we consider that archaeological monitoring will be the most appropriate form of response.*

In conclusion, no objection is raised under CP58 and the NPPF provisions, subject to a condition requiring a written programme of archaeological investigation.

## **7.5 Highway Safety and Public Right of Way**

The development would provide 2 additional parking spaces, 10 cycle spaces and 1 additional disability space. Several third parties have objected to the proposal on the grounds that the site and surrounding areas are already congested with vehicles and that these cause an obstruction to existing accesses and are a danger to highway users, close to a dangerous junction. The proposed expansion of the care home will only exacerbate this problem. One resident feels that parking restrictions should be imposed and another suggested amending the alignment of the proposed external wall to improve visibility to their access.

The NPPF sets out the criteria for new transport related development:

108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

*a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*

*b) safe and suitable access to the site can be achieved for all users; and*

c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

**109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.**

Core Policy 57, 60, 61 and 62 are also relevant and the highways officer has responded:

*I note the proposal seeks the refurbishment and extension of the existing 24 bed care home, to a 30 bed care home, including a revised access and parking area from Manor Farm Road. The existing care home is substandard in terms of parking provision, with only 4 no. parking spaces available. The proposal will increase the number of spaces available to 7, including one dedicated disabled space and whilst overall parking provision for the care home would remain substandard, the increase in spaces is adequate to accommodate the modest extension of 6 bedrooms.*

*Alterations to the existing access will be relatively significant and I am satisfied with the visibility splays shown on plan, on the basis that the site is within a 20mph zone. I also feel that the new access and parking arrangement will improve highway safety on a section of Manor Farm Road that narrows, as a result of onsite vehicle turning now being provided. This will also benefit any delivery vehicles accessing the care home. I also note that new cycle parking is proposed, which is welcomed.*

*As a result of the above, I do not believe the modest extension and alterations will have a detrimental impact upon highway safety and as such, I recommend that no Highway objection is raised, subject to conditions and an informative being added to any consent granted.*

With specific reference to Rosemead, the highways officer considered the proposed wall:

*I have double checked this & the wall is set sufficiently back from the edge of the road so as not to obstruct visibility. We require visibility to be measured from a point 2.4m back from the edge of the road & the wall does not create an obstruction when measuring visibility in this way from the adjacent property's access.*

*A minimum visibility splay of 2.4m x 25m is required in this location and despite the wall, the property would appear to have at least 35m visibility to the south, when measured from 2.4m back.*

*Its potentially worth highlighting that the wall is not the redline but is actually set back from the redline boundary. The wall would also appear to be in a similar position to the existing fence.*

The applicant has previously produced land registry evidence to show that their ownership extends to the centre of Milford Hollow, and this reflects the presence of the overhanging jetties on the original building over the right of way. The rights of way officer has raised no objection and feels that the right of way would not be affected by the development: *"This part of Milford Hollow (public footpath SALS74) is maintainable by Wiltshire Council as highway authority. I have no objection."*

An informative would be added to any permission to advise the developer that the right of way must not be obstructed at any time during construction.

## 7.6 Drainage and Flood Risk

The site lies within Flood Zone 1. The drainage team have raised no objection to the proposals relating to the discharge of surface and foul water from the site (soakaway and mains drainage).

## 7.7 Community Infrastructure Levy

The Community Infrastructure Levy (CIL) is a charge that local authorities in England and Wales can put on new development in their area to raise funds to help deliver the infrastructure necessary to support this development. The Wiltshire Community Infrastructure Levy May 2015 Charging Schedule states that new C2 floorspace would be charged at a rate of £85 per square metre in Zone 1. Therefore, an informative would be added to any permission to bring to the applicant’s attention the requirement for the levy to be paid on commencement of development.

Table 2.1 – Rates of CIL to be charged on new development

Development Type <sup>1</sup>		CIL charge £/ sq m	
		Charging Zone 1 (settlement categories 1, 2 and 3)	Charging Zone 2 (settlement category 4 <sup>2</sup> )
Residential development	Residential development (excluding strategically important sites as set out in the Wiltshire Core Strategy)  Planning Use Classes: C2, C2A, C3 and C4	£85	£55

## 7.8 Waste, Recycling and Energy Efficiency

As the scheme is classified as a major development (over 1,000sqm), the applicant has prepared a Waste Audit, which seeks to ensure the maximum recycling of existing materials on the site and the minimisation and segregation of any waste arising from the proposed redevelopment. Waste team have previously raised no objection, in accordance with Waste Core Strategy **Policy WCS6**.

For new build development exceeding 1,000sqm gross, a condition would normally be applied under **Core Policy 41** requiring evidence that the “very good” BREEAM standard (or any such equivalent national measure of sustainable building which replaces that scheme) has been achieved for the development. Government guidance has been updated and this is now achieved through the building regulations procedure.

## 7.9 Public Open Space:

The proposals also need to comply with saved **Policy R3**:

*R3 The recreational open space requirement for new development providing accommodation for the elderly will be reduced to 0.8 hectares per 1000 population. Additional amenity open space within the site will be sought as appropriate.*

*Development proposals for nursing homes will be required to provide on-site amenity space. In both cases, on-site amenity space should be of a sufficient size and appropriately landscaped to provide informal sitting out areas, and should be located to maximise the south and south western aspects of the site and the outlook from it.*

The Local Planning Authority recognises that certain developments, such as nursing home accommodation for the elderly, generate different open space needs because of the greater reliance which their occupants have on on-site amenity space and the very limited demand for recreational facilities. On-site amenity space is, however, important in these types of development, providing pleasant views from habitable rooms within the development and as sitting out areas for residents. Amenity space has been provided for this development, including a new sensory lawn/garden and a separate garden and seating to the front of the site. This would enable residents to enjoy interaction with one another and would satisfy Policy R3.

## **7.10 Conclusion**

The proposal seeks to extend an existing nursing home from 24 to 30 beds, within the Salisbury settlement boundary and the development is acceptable in policy principle.

The development seeks to remove modern extension and then extend a Grade II listed building and make various internal and external alterations to the original building. Officers consider that whilst the alterations to the historic core of the listed building are acceptable, the proposed extension would cause substantial harm to the setting of the listed building and are inadequately justified in terms of the *substantial public benefit* terms required by the NPPF para 195 (previously 133) which states:

*195. Where a proposed development will lead to substantial harm to.. a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm..is necessary to achieve **substantial** public benefits that outweigh that harm or loss.*

Neighbours immediately adjacent to the site (south and west) have maintained their objections to the development on the grounds of dominance, intrusion, loss of privacy and overlooking and light intrusion. Despite the many improvements that the applicant has made to the scheme, officers still feel that these objections are justified and have given reasons for the amenity objections under CP57 in this report.

There are no objections to the development on light, noise impact, parking or access grounds. The development would see a modest increase in parking provision and an improvement in the site access.

### **RECOMMENDATION: REFUSE for the following reasons:**

- 1) The development seeks to remove modern extensions and to extend and alter a Grade II listed building comprising a 24 bed nursing home. The proposed extension and alterations would add six new bedrooms and other facilities, to create a modern, 30 bed nursing home facility. The listed building, despite its relatively poor quality extensions, is pre-eminent on the site and the present extensions are very much



secondary and partially obscured from view from Manor Farm Road. The proposed extension is a substantial three-storeyed cranked range occupying a footprint that is significantly disproportionate to its host.

Whilst there are some elements of heritage gain or neutrality within the proposals (by removing the poor quality modern extensions and the proposed refurbishment works to the original building), the proposed extension, by virtue of its overall design, height and footprint, would cause “substantial” harm to the character and setting of the listed building and are inadequately justified in terms of the *substantial* public benefits required by the NPPF para 195. The proposal would therefore be contrary to Sections 16 and 66 of The 1990 Act, Paragraph 195 of the NPPF and the aims of Wiltshire Core Strategy Core Policy 58.

- 2) The site lies adjacent to No 10 Westbourne Close, Milford Grove and White Lodge. The proposed 3 storey extension to the listed building, by virtue of its design, scale, massing and proximity to boundaries would result in an unacceptable level of perceived and actual overlooking towards neighbouring residential properties from the south and west elevation projecting bay windows, which would be etched, with openable, clear glazed side panels. The extension would appear unduly dominant, to the detriment of the neighbouring occupiers, and would fail to make the development acceptable to the wider community, contrary to Wiltshire Core Strategy Core Policy 57(vii) and paragraphs 124, 127 and 130 of the 2018 NPPF.

ctd.....

## Appendix 1 Summary of Main Changes to Scheme:

- Proposed replacement building/extension moved 600mm further away from the boundary of No. 10 Westbourne Close. (ie to the east/toward Manor Farm Road).
- Raised pleached trees added as privacy screening for the Care Home residents and the occupiers of No 10 Westbourne Close (WC). Note: Each tree is positioned so as to maximise the screening effect between residents and neighbours windows and inclined at 45 degrees to the boundary for ease of access to both sides of the 'raised screen hedge' to enable pruning/long term maintenance and also so as to allow light/air between the properties. The raised pleached tree nearest to the Residents Garden is precisely located so as to obscure direct views between Residents Bedroom No. 20 and the 1<sup>st</sup> floor window of No 10 EC.
- Following submission of the current scheme the Planning Officer questioned the year round effectiveness/permanency of the pleached tree(s) as a screen.

(NB: The species specified within the application for the pleached screen trees is Hornbeam. Whilst Hornbeams change colour in the autumn they retain their leaves, thereby providing effective year round screening. Recognising the importance of these trees, the Applicant (Wessex Care) have agreed to accept a 10 year planning condition to ensure the proper establishment and maintenance of the screen trees).

However to allay any concerns over the long term effectiveness of the pleached tree screen we are now proposing to also add a fixed permanent timber and metal screen designed to block direct views between the residents of the care home and the occupiers of No 10 WC.

This fixed screen also now forms part of the application. The pleached tree(s) screening will be retained for screening and landscape/visual amenity purposes.

- Patio and patio doors formerly located on the west elevation and facing boundary with No 10 EC have now been relocated so as to be on the north elevation facing the Residents Garden. In place of the former patio area landscape planting has been provided so as to soften flank wall of the proposed replacement building/ extension and to act as a buffer between the boundary and the building.
- Boiler chimney relocated so as to be within proposed replacement building and 5m further away from neighbour at no 10 EC
- Building set 300mm lower into the ground. This will lower building height/windows/general visual impact etc.
- Lowering building has required re-planning the building so as to place the Spa/Physio/Residents Kitchen within the proposed replacement building/ extension where we can now only achieve high level windows. This also reduces the level of intervention required within the Listed Building. The Care Rooms have been located elsewhere within the building.
- A mansard roof introduced to the proposed replacement building/extension so as to lower the eaves level/visual height of the building ('gutter level' now lower than that of the Listed Building) and clad with contemporary but regressive (in terms of colour) standing seam zinc cladding.
- The steeply pitched 'feature' glazed light located over the Entrance/Main Stair area of the replacement/extended building (light pollution/visibility) has been removed from the current application.

- Elevations below 'roof' of extension clad in stained timber down to top of Milford Hollow 'wall' level/ground floor accommodation – softer/quieter/more regressive than buff coloured faux stone. Timber cladding to be low maintenance dark/mid grey Accoya (sustainably grown timber with 50 year life span – samples available).
- Off-set/angled bays replaced by 'stacked' projecting square bays with clear glazing to sides looking forward/backwards along flank of building and acid etched obscure glazing facing neighbouring properties – allows light but not sight – light vital for elderly/those with dementia).
- Stacking the bays will simplify the elevations and be a less visually challenging than the contemporary configuration.
- Obscure glazing will be noted as being acid etched glass (not film coating) and indicated as hatched on the elevations.
- All changes/concessions (and more as noted above) made to Conservation Officers leading up to consideration of the previous scheme by SAC are incorporated into revised application plans/elevations.
- External escape stair removed and relocated within the glazed 'link' and adjacent to Milford Hollow. Fire Escape/Staff Entrance door (like a 'garden gate') will be located below the half landing of this stair.
- Loft area within Listed Building changed to be Storage ONLY. Staff Cloaks/Shower Rm facility also removed thereby negating the need for the former roof level escape stair.
- To avoid confusion we no longer show the basement accommodation (in section) on the west elevation (not visible above ground). This clearly illustrates the fact that there are only 2 x above ground storeys adjacent to No 10 WC boundary.
- Top of the existing/very high brick boundary wall (now even higher relatively speaking as building has been lowered 300mm into the ground) highlighted on west elevation facing No 10 WC. NB: Relative level of garden/top of wall amended/corrected based on information provided by the occupiers of No 10 WC.
- Elevation from No 10 WC's side of the boundary wall now included within the application drawings and shows screening effect of existing boundary wall, raised pleached trees and extent of garden to No 10 EC. NB: Relative level of garden/top of wall amended/corrected based on information provided by the occupiers of No 10 WC. Applicant has/had agreed to maintain the line of the top of the boundary wall on to the end of the site (currently wall sweeps down to lower level for the last 1/3<sup>rd</sup> [approx.] of the wall length).
- We have provided cross section set at 45 degree to rear of No 10 EC to illustrate relationship of proposals to No 10 WC and to demonstrate effectiveness of raised pleached tree screen (see also 2<sup>nd</sup> bullet point and above). NB: Relative level of garden/top of wall amended/corrected based on information provided by the occupiers of No 10 WC. Applicant has/had agreed to maintain the line of the top of the boundary wall on to the end of the site (currently wall sweeps down to lower level for the last 1/3<sup>rd</sup> [approx.] of the wall length).
- Made clearer/annotated on Site Plan the fact that front boundary wall with Manor Farm Road is set back as it approaches 'Rosemead' to improve visibility to highway from 'Rosemead's' access drive.
- Central vehicle manoeuvring diagram for 'refuse vehicle' will also allow rigid van type deliveries to enter the site instead of parking on Manor Farm Road as at present thereby reducing incidence of obstructing visibility around the swept corner in Manor Farm Road.

- Site Plan annotated to identify “Onsite Staff/Visitor Parking”. Increased on-site parking from 4 to 7 spaces will reduce roadside parking/congestion over present parking availability/arrangement.
- General/Staff Cycle Store detailed and annotated as such (also doubles as a Staff/Residents Smoking Shelter – see next).
- The ‘cycle store’ is now a pavilion of which 50% will be annotated as being a ‘Smoking Shelter’ which is located well away from the boundary with No. 10 EC
- Revised proposals have been discussed in detail with neighbours at No 10 Westbourne Close and Milford Grove/White Lodge on Shady Bower.