

Coles Farm, Alcombe, Corsham, SN13 8QL

Planning Statement

Webster Hart

January 2026

Coles Farm, Alcombe, Corsham, SN13 8QL

Planning Statement

Client: Webster Hart

Date: January 2026

Prepared for

Webster Hart

Prepared by

Morgan Elliot Planning Ltd
35 Rodney Road
Cheltenham
GL50 1HX

Contact

Claudia Jones MRTPI
Associate Director

[REDACTED]

Megan Packer
Graduate Planner

[REDACTED]

Version Control

Project	2572
Issue Date	January 2026
Originator	MP
Checked	CJ
Version	V1

Contents

1	INTRODUCTION	4
2	SITE AND SURROUNDING AREA.....	6
	The Site	6
	Designations.....	6
	Relevant Planning History	7
3	PRE-APPLICATION RESPONSE	9
	Principle of development/Green Belt	9
	Heritage and design considerations	9
	Ecology.....	10
4	THE PROPOSAL.....	11
5	PLANNING POLICY CONTEXT.....	13
	Wiltshire Core Strategy.....	13
	Material Considerations.....	16
6	CONSIDERATION OF PLANNING POLICY ISSUES	21
	Principle of development	21
	Green Belt Considerations	22
	Heritage and Design Considerations.....	23
	Cotswold National Landscape	23
	Ecology.....	24
7	SUSTAINABLE DEVELOPMENT AND PLANNING BALANCE.....	26
	Sustainable form of development	26
	Planning balance.....	26
8	CONCLUSIONS	28

1 INTRODUCTION

- 1.1 This Planning Statement has been prepared by Morgan Elliot Planning on behalf of our client Webster Hart (the Applicant) to accompany a householder planning and listed building consent application for proposed internal and external works to an existing dwelling at Coles Farm, Alcombe, Corsham, SN13 8QL.
- 1.2 Coles Farmhouse is a highly significant Grade II* listed farmhouse of the mid-17th century with later 17th-century additions. Constructed of local rubble stone under a stone-tiled roof with coped gables dated 1646 and 1685, the building is substantial and is of high architectural and historic interest.
- 1.3 The applications benefit from pre-application advice provided by Wiltshire Council (ENQ/2025/01728), with officers indicating support in principle for the proposed internal and external alterations to the Farmhouse.
- 1.4 This Planning Statement provides a contextual analysis of the site and the surrounding area, together with details of the planning history in **Section 2**. **Section 3** provides an overview of the pre-application response, whilst **Section 4** details the proposal. **Section 5** appraises the relevant policies contained within the development plan for the area, as well as other material considerations relevant to the development proposed, including the National Planning Policy Framework (NPPF) and the Wiltshire Design Code. **Section 6** assesses the main planning issues and **Section 7** outlines undertakes the necessary planning balance. The conclusions are set out in **Section 8** where it found that planning permission can be granted without delay.
- 1.5 This PS should also be read in conjunction with the following;
- Application form
 - Site location plan
 - CIL form
 - Existing and proposed block plan
 - Existing and proposed floorplans
 - Detailed drawings
 - Ecological Impact Assessment

- Design Statement
- Heritage Impact Assessment

2 SITE AND SURROUNDING AREA

The Site

- 2.1 The application site comprises Coles Farm, located within the hamlet of Alcombe on the western edge of the village of Box, within the administrative area of Wiltshire Council. The site lies in a distinctly rural setting, characterised by open countryside, agricultural land and dispersed residential properties and small rural holdings, reflecting the historic settlement pattern of this part of Wiltshire.
- 2.2 At the heart of the site is Coles Farmhouse (List Entry Number: 1022715), a substantial Grade II* listed 7-bed dwelling of significant architectural and historic interest. This is due to its exceptional preservation as a substantial 17th-century vernacular farmhouse. Its architectural importance is demonstrated by high-quality original features like ovolo-moulded windows, hoodmoulds, and multiple stone fireplaces. The building clearly shows its evolution through dated gables (1646 and 1685) and has strong historic interest from its long association with the Webb family from c.1633, offering a complete picture of prosperous domestic life of the period.
- 2.3 The farmhouse is set within a defined residential curtilage that also contains historic outbuildings, a formal garden area, pasture, mature planting and boundary treatments including stone walls and hedgerows.
- 2.4 There are two outbuildings that sit immediately west of the house and just beyond that lies a glasshouse. Immediately east of the southern most outbuilding comprises a grassed area that formerly comprised a swimming pool constructed in 1978 which has since been infilled.
- 2.5 The primary vehicular access into the site is off the road north, leading into a courtyard for parking. A secondary access route is situated further west along the road, which leads into a long drive through an orchard ending at the courtyard.

Designations

- 2.6 In terms of site designations, and aside from the dwelling's listing, the site lies within the designated Green Belt and the Cotswolds National Landscape. The site is in Flood Zone 1, an area with a low probability of fluvial, pluvial and surface water flooding. There are no public right of ways (PROW) on site, however, a PROW sits further west of the site (ref. BOX4) and further south of the site (ref. BOX3) (see Figure 1 below).

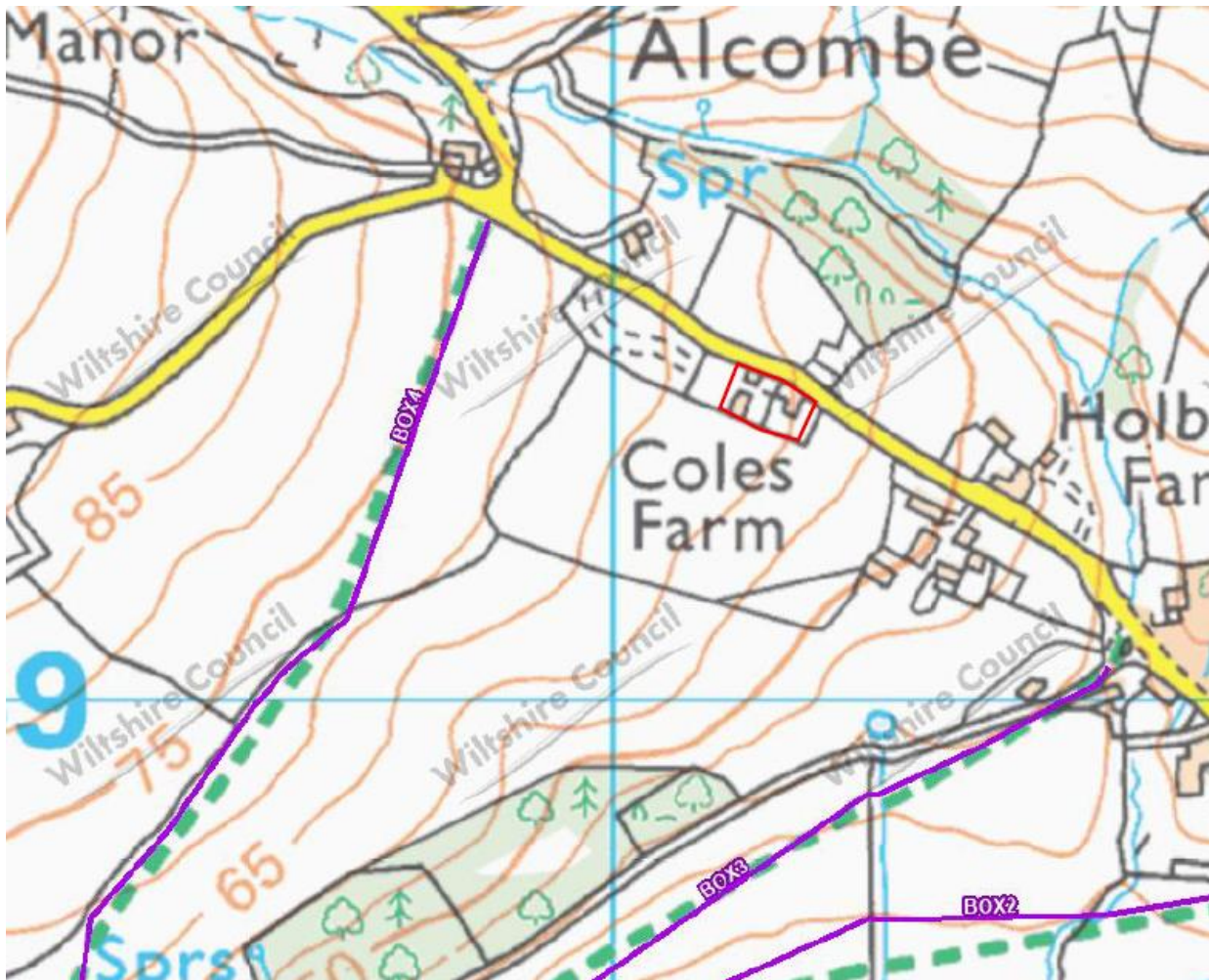


Figure 1 Plan showing local PROW network in relation to the site (outlined in red).

Relevant Planning History

2.7 Having reviewed the Council's online records, the following planning history is of relevance to the site:

- **BR/19/01838/FENSA**- Install replacement windows in a dwelling & Install replacement door in a dwelling. Complete
- **16/06087/PREAPP**- Install replacement windows in a dwelling. Complete
- **N/11/01914/LBC**- Relocating Boundary Wall. 23/06/2011. Approved with Conditions
- **N/11/01909/FUL**- Relocating Boundary Wall. 23/06/2011. Approved with Conditions

- **N/93/01044/FUL**- Removal of existing greenhouse and erection of new greenhouse on existing foundations replacement greenhouse. 04/05/1990. Approved with Conditions
- **N/90/00073/LBC**- Alterations within the curtilage of a listed building - double garage.15/01/1990. Approved with Conditions.

3 PRE-APPLICATION RESPONSE

- 3.1 A pre-application enquiry was submitted to the Local Planning Authority on 17th October 2025 and a subsequent pre-application response received on 8th January 2026 (ref. ENQ/2025/01728).
- 3.2 The pre-application response considered the principle of the proposed works that are subject of this application, along with commentary around the site's situation in the Green Belt and the historic status of Coles Farmhouse.

Principle of development/Green Belt

- 3.3 The pre-application response considered the proposed works in principle, noting the works were very much contained within an existing residential curtilage.
- 3.4 Consideration was also given to the site's situation in the Green Belt. In the context of Paragraph 154 c) of the NPPF, the planning officer commented that *"The works to the dwelling are predominantly internal changes, which from the information submitted appears not to extend the footprint of the existing dwelling and would not be considered disproportionate at this stage."*
- 3.5 The works proposed as part of this application have remained broadly the same and therefore the conclusions of the pre-application response apply.

Heritage and design considerations

- 3.6 In the context of adopted local plan policies CP57 and CP58, the Planning Officer stated that *"the proposed works and alterations to the main dwelling appear, at this stage, to be appropriate and well considered."* It is also worth highlighting that the Conservation Officer commented as part of the pre-application response, stating:

"Normally in these cases we advise an adequate Heritage Assessment is provided – in this case a robust and detailed heritage assessment has been provided therefore compliant within the NPPF's requirements."

The proposed repairs appear logical and well considered."

- 3.7 The Planning Officer has requested a full schedule of works and for clarify as to whether any historic fabric is to be removed as part of the proposals. Furthermore, they have requested full

joinery details should be submitted for any new partitions, including materials, profiles, and finishes, to ensure that the design is sympathetic to the internal character of the building. In addition, detailed information on how the existing doorway is to be sealed off should be provided with any future application.

- 3.8 It has been requested that these details must clearly demonstrate whether the proposed works would be reversible or not, thereby safeguarding the potential for reinstatement in the future and minimising any permanent impact on the historic fabric.
- 3.9 Overall, the proposal is considered to have no impact upon the identified heritage assets and, at this stage, would not appear to unduly harm the character or significance of the listed building. This conclusion was made in the context that there would be no harm to the historic fabric.
- 3.10 The proposals as part of the subject application have not materially changed, and rather, the scale of works have been reduced such that the same conclusions from officers apply.

Ecology

- 3.11 The Council's ecologist commented as part of the pre-application, outlining the site's situation in the consultation zone for the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC), its proximity to County Wildlife Site Briary Wood and the potential for impact on local species and habitats.
- 3.12 Accompanying this application is a Preliminary Bat Roost Assessment and Bat Surveys report which have outlined the ecological considerations attached to the site.
- 3.13 In respect of the proposed works subject of this application, the conclusion is that no further survey effort is required. This is explained in further detail within Chapter 6 of this Statement.

4 THE PROPOSAL

- 4.1 The application seeks Householder planning permission and listed building consent for a series of internal and external works to Coles Farmhouse.
- 4.2 This application seeks consent for a series of internal and external alterations and modest enhancements to Coles Farmhouse. The proposals are focused on improving the functionality of the dwelling for modern living while preserving and enhancing the architectural and historic significance of the Grade II* listed building and its setting.
- 4.3 Externally, there will be very minor alterations to the existing building. These include the opening up of a lightwell in the basement and the closing over of a door on the ground floor. Any new materials will remain the same as the existing or matching to the character of the existing dwelling and local area.
- 4.4 Furthermore, the proposed works to the main house comprise a series of internal alterations and repairs, including to the basement, ground, first and second floor levels
- 4.5 The basement space will be made into a dedicated wine store. A previously blocked-up lightwell will be reinstated, improving natural light and ventilation and reinstating a historic feature of the building.
- 4.6 A new pantry is proposed, alongside new joinery within the kitchen and boot room to improve storage and functionality. A new entrance arrangement is proposed to enhance circulation and legibility within the plan form, whilst respecting the historic fabric.
- 4.7 The master bathroom and dressing room will be reconfigured on the north-eastern side of the first floor to provide improved accommodation. Historic fireplaces will be reopened where appropriate, reinstating original features.
- 4.8 Throughout the house, all bathrooms will be upgraded with new sanitaryware. These works will be undertaken in a sensitive manner, using high-quality fittings and finishes that are appropriate to the character and status of the listed building.
- 4.9 The property is currently in a good state of repair and well presented, both internally and externally. The proposed works are therefore not driven by a need for remedial repair, but rather seek to secure the long-term sustainable use of the building, enhance day-to-day functionality, and better reveal and conserve historic fabric. The proposals have been carefully developed to

ensure that any intervention is minimal, reversible where possible, and proportionate, in accordance with heritage policy and best conservation practice.

5 PLANNING POLICY CONTEXT

- 5.1 In line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the proposals have been assessed in line with the relevant development plan for this site which includes the Wiltshire Core Strategy (adopted January 2015) and Saved Policies in the North Wiltshire Local Plan 2011. Other material considerations include the emerging Wiltshire Local Plan, the National Planning Policy Framework (NPPF) (published 2024; updated February 2025) and the Wiltshire Design Guide (adopted 25th March 2024).

Wiltshire Core Strategy

- 5.2 The following policies of the Wiltshire Core Strategy are considered particularly relevant to the proposed development:
- 5.3 **Core policy 2** ‘delivery strategy’ explains that “other than in circumstances as permitted by other policies within this plan, identified in paragraph 4.25, development will not be permitted outside the limits of development, as defined on the policies map. The limits of development may only be altered through the identification of sites for development through subsequent Site Allocations Development Plan Documents and neighbourhood plans. At the Small Villages development will be limited to infill within the existing built area. Proposals for development at the Small Villages will be supported where they seek to meet housing needs of settlements or provide employment, services and facilities provided that the development:
- i) Respects the existing character and form of the settlement
 - ii) Does not elongate the village or impose development in sensitive landscape areas
 - iii) Does not consolidate an existing sporadic loose knit areas of development related to the settlement.
- 5.4 **Core Policy 48** relates to supporting rural life and sets out a number of exceptions to development in the open countryside.
- 5.5 **Core Policy 50** states that development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity, and functionality in the long term.

Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and to secure the integrity of local ecological networks and the provision of ecosystem services.

All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.

All development should seek opportunities to enhance biodiversity.

Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment.

5.6 **Core Policy 51** specifies that development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:

- i) The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies.
- ii) The locally distinctive character of settlements and their landscape settings.
- iii) The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.
- iv) Visually sensitive skylines, soils, geological and topographical features.
- v) Landscape features of cultural, historic and heritage value.
- vi) Important views and visual amenity.
- vii) Tranquillity and the need to protect against intrusion from light pollution, noise, and motion.

- viii) Landscape functions including places to live, work, relax and recreate.
- ix) Special qualities of Areas of Outstanding Natural Beauty (AONBs) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty.

Proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFNP) or Stonehenge and Avebury World Heritage Site (WHS) shall demonstrate that they have taken account of the objectives, policies and actions set out in the relevant Management Plans for these areas. Proposals for development outside of an AONB that is sufficiently prominent (in terms of its siting or scale) to have an impact on the area's special qualities (as set out in the relevant management plan), must also demonstrate that it would not adversely affect its setting.

5.7 **Core Policy 57** illustrates that 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 complementary 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:

- enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development and responding to local topography by ensuring that important views into, within and out of the site are to be retained and enhanced.
- The retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development.
- Being sympathetic to and conserving historic buildings and historic landscapes.
- Making efficient use of land whilst taking account of the characteristics of the site and the local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area.

- The use of high standards of building materials, finishes and landscaping.

5.8 **Core Policy 58** states that 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, including:

- buildings and structures of special architectural or historic interest
- the special character or appearance of conservation areas

Distinctive elements of Wiltshire's historic environment which contribute to a sense of local character and identity will be conserved, and where possible enhanced. The potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping). Heritage assets at risk will be monitored and development proposals that improve their condition will be encouraged. The advice of statutory and local consultees will be sought in consideration of such applications.

Material Considerations

Emerging Wiltshire Local Plan

- 5.9 **Emerging Policy 2 'Delivery Strategy'** states that development adjoining or beyond settlement boundaries will be managed in line with several policies, including draft Policy 82 'Housing in the Countryside'.¹
- 5.10 **Emerging Policy 82 'Housing in the countryside'** sets out that proposals for housing development outside of defined settlement boundaries will not be supported, save for few exceptions. This includes that *'the proposal would enable a viable and sensitive alternative use of a heritage asset in a manner which secures its protection and longevity and retains the characteristics for which it is valued as a heritage asset (2).'*
- 5.11 Other emerging Local Plan policies relevant to ecology, landscape, design and heritage are worded similar to the adopted Core Strategy.

National Planning Policy Framework

- 5.12 The National Planning Policy Framework (NPPF) was first published in 2012 and has since been updated on seven occasions, the most recent of which was published in December 2024 and updated in February 2025.
- 5.13 Sustainable development is defined in **Paragraph 8** of the NPPF, and includes three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways; these being economic, social and environmental factors.
- 5.14 **Paragraph 10** is clear that so sustainable development is pursued in a positive way, at the heart of the framework is a presumption in favour of sustainable development.
- 5.15 **Paragraph 11** states for decision taking, this means *“approving development proposals that accord with an up-to-date development plan without delay”*. It also details, *“where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. 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, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”*
- 5.16 **Chapter 12** relates to achieving well-designed places and highlights that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve.
- 5.17 **Paragraph 131** expresses the importance of creating high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

- 5.18 **Paragraph 135** sets out that it is important to 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, whilst not preventing or discouraging appropriate innovation or change;
 - 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; and
 - e) 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; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 5.19 **Paragraph 139** states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to, inter alia, *“development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes.”*
- 5.20 **Chapter 13** relates to the protection of the green belt. **Paragraph 142** states the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- 5.21 Furthermore, **paragraph 143** sets out the five purposes of the green belt. These include;
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;

- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 5.22 **Paragraph 153** states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 5.23 **Paragraph 154 (c)** expresses, however, that other forms of development can be considered appropriate, including *“the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building.”*
- 5.24 **Paragraph 187** of the Framework states planning decisions should contribute to and enhance the natural and local environment by:
- Protecting and enhancing valued landscapes, sites of biodiversity value;
 - Recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
 - Minimising impacts on and providing net gains for biodiversity.
- 5.25 **Paragraph 189** states great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes. The scale and extent of development within these designated areas should be limited.
- 5.26 **Paragraph 193** of the Framework states local planning authorities, when determining planning applications, should ensure that planning permission is refused if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or compensated for.
- 5.27 **Paragraph 207** states 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.

- 5.28 **Paragraph 210** states in determining applications, local planning authorities should take account of, inter alia, *“the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation”* and *“the desirability of new development making a positive contribution to local character and distinctiveness.”*
- 5.29 **Paragraph 212** of the framework states that 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.

Wiltshire Design Guide

- 5.30 **Paragraph 4.5.19** states that *“Restoration work to historic buildings should generally be faithful to and closely match the appearance of the original work, in terms of detailing and facing materials/finishes.”*
- 5.31 **Paragraph 4.5.20** states that *“in conservation areas, or within the setting of listed buildings, it should be demonstrated that the detailing of new development will not cause a detrimental visual impact. Reference should be made to Historic England’s suite of design guidance.”*

6 CONSIDERATION OF PLANNING POLICY ISSUES

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 require that applications for planning permission be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.2 Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states when considering whether to grant planning permission for development that affects a listed building or its setting, the local planning authority should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 6.3 The previous section of this Statement has identified all the relevant development plan and national planning policies that are appropriate to the proposed development. This section seeks to assess the proposal against those requirements and weighs up the application in the planning balance.

Principle of development

- 6.4 The site sits within the open countryside as defined in planning policy terms. The adopted and emerging development strategy seek to restrict development in the open countryside save for few exceptions. These are listed in Core Policy 48 and Saved Policy H4, and emerging Local Plan policy 82. In terms of the adopted Local Plan, and from a development strategy perspective, the proposals do not meet the exceptions identified.
- 6.5 In relation to the principle, however, the development plan is silent as it does not consider works within the curtilage of an existing dwelling. Therefore, Paragraph 11 d) of the NPPF must be considered whereby planning permission should be granted unless:
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
 - ii. 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, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

- 6.6 Notwithstanding the above, the nature of the proposals, comprising limited development within a defined residential curtilage associated with the main residential use, is not considered to harm the purpose of Core Policy 48 which is to ‘support rural life’, similar to emerging Local Plan policy 82. One can therefore argue that the proposals do not conflict with the overarching adopted development strategy.
- 6.7 In terms of other material considerations, emerging Local Plan policy 82 2) allows for housing in the open countryside where it would *“enable a viable and sensitive alternative use of a heritage asset in a manner which secures its protection and longevity and retains the characteristics for which it is valued as a heritage asset.”* Whilst the proposals are not delivering new housing in the open countryside, it relates to an existing dwelling that is Grade II* listed for which our client is looking to help restore and enhance, securing its future historic significance. This is discussed in more detail below and within the accompanying Statement of Significance. Again, the proposals can be read to support the principle of emerging Local Plan policy 82 2)
- 6.8 The planning balance contained in Paragraph 11 d) of the NPPF will be undertaken further below.

Green Belt Considerations

- 6.9 The site sits within the Green Belt where development is, by definition harmful, save for few exceptions. Paragraph 154 of the NPPF c) outlines that the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building.
- 6.10 The original building is defined in Annex 2 of the NPPF as being a *“building as it existing on 1st July 1948 or, if constructed after 1st July 1948, as it was built originally.”* As set out in the accompanying Heritage Report, the majority of the house was constructed pre-1948 save for the new entrance lobby and passage that sit in between the existing kitchen and the 1600s build. The amends to the dwelling as proposed are not, cumulatively, considered to be disproportionate to the main dwelling noting their limited scale. This is reflected in the LPA’s pre-application response: *“The works to the dwelling are predominantly internal changes, which from the information submitted appears not to extend the footprint of the existing dwelling and would not be considered disproportionate at this stage.”*
- 6.11 Taking the above into account, the proposals comprise an acceptable form of development in the Green Belt.

Heritage and Design Considerations

- 6.12 The proposed development has been carefully informed by the established character, materials and proportions of the historic building. Traditional materials and construction techniques will be used where appropriate, ensuring compatibility with the existing fabric and avoiding long-term harm.
- 6.13 In accordance with national and local planning policy, great weight has been given to the conservation of the Grade II* listed building and its setting. The proposals are considered to result in no harm to the significance of the heritage asset or loss of its historic features, particularly due to the majority of them being internal works.
- 6.14 Core Policy 51, 57 and 58 of the Wiltshire Core Strategy put emphasis on conserving heritage assets. In particular, Core Policy 57 states *“The potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping).”*
- 6.15 Where minor change occurs, this is justified by the benefit of securing the building’s long-term viable use and enhancing its condition through sensitive repair and improvement.
- 6.16 Furthermore, the proposal also complies with paragraph 207 and 212 of the NPPF, which also emphasise the importance of conserving heritage assets.
- 6.17 The accompanying Heritage Assessment provides a more detailed assessment of the proposals against the relevant policy tests.

Cotswold National Landscape

- 6.18 The site sits within the Cotswold National Landscape where Paragraph 189 of the NPPF and Core Policy 51 seeks to conserve and enhance its special landscape qualities and characteristics. Paragraph 189 also states that proposals within the National Landscape should be limited. The limited scale of the proposals therefore meets this policy requirement.
- 6.19 As the proposal is contained within an existing residential curtilage, they will not cause harm to the landscape character and special qualities of this part of the National Landscape. Whilst there are PROW routes near to the site, the site is well screened with existing vegetation.

Notwithstanding, given the nature and extent of the proposals, these will be contained in existing built form that already forms part of the character of this part of the landscape.

6.20 The LPA's response pre-application response reflects this stating that *"any visual impact upon the wider landscape is likely to be minimal."*

6.21 Consequently, the proposals comply with Core Policy 51 and Paragraph 189 of the NPPF.

Ecology

6.22 A Preliminary Bat Roost Assessment and subsequent bat activity surveys have been undertaken in the Farmhouse to ensure that the proposed development aligns with Core Policy 50 which puts emphasis on the preservation of natural features and habitats.

6.23 The initial survey carried out in August 2025 found that DNA analysis confirmed bat droppings belonging to brown long-eared bats, therefore three further surveys were carried out in September 2025 in the main house which confirmed the presence of:

- One brown long-eared day roost in the main roof space (L-shaped) for low numbers of bats with bat droppings found and confirmed by DNA analysis. No bats were observed emerging during the survey.
- One common pipistrelle day roost for low numbers (one bat) under a roof tile on the main roof of the house.
- One serotine day roost for low numbers (one bat) under a roof tile on the main roof of the house.
- One serotine day/night roost for low numbers (one bat) under a roof tile on the main roof of the house.

6.24 Due to the findings, the ecologist has concluded that two further bat surveys are required in the summer of 2027 to obtain A European Protected Species Licence, required to allow works to the house and outbuildings supporting the seven bat roosts.

6.25 This will include, details of replacement roosts, including bat boxes for common pipistrelle and retained or replacement voids for brown long-eared, serotine and lesser horseshoe, protection measures during the works and monitoring and maintenance.

6.26 The proposals forming this application do not include the removal, replacement or lifting of the roof structure, nor works to identified roost features. As such, the project ecologist is satisfied

that the proposed works will not result in the loss of bat roosts or cause significant harm to bats. As such the proposal protects the presence of bats.

- 6.27 The site is also located within the consultation zone for the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) and within 60 metres of the Briary Wood County Wildlife Site. However, given the limited nature of the proposals, it is not considered that the scheme will impact upon the protected species within the designations.
- 6.28 Taking all the above into account, the proposals comply with Core Policy 50 and Paragraphs 187 and 193 of the NPPF.

7 SUSTAINABLE DEVELOPMENT AND PLANNING BALANCE

Sustainable form of development

- 7.1 The proposals are considered to comprise a sustainable form of development, having regard to the objectives set out in Paragraph 8 of the NPPF.
- 7.2 Economically, the proposals will deliver short-term job prospects locally for those who will be instructed to construct the outbuilding. Socially, the proposals enhance the prosperity of the Applicant's family to remain within the local area, meeting the needs of family living. Environmentally, the proposals seek to conserve and enhance the setting of nearby listed buildings, and the site's situation in the Cotswold National Landscape.

Planning balance

- 7.3 In line with Section 38(6), it has been demonstrated that when read as a whole, the proposals comply with the development plan in principle. However, in this case Paragraph 11 d) of the NPPF is triggered given there are no relevant development plan policies that relate to the principle of development. Consequently, the following limbs of Paragraph 11 d) should be met in order for planning permission to be granted:
- i. *“the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
 - ii. *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, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”*
- 7.4 Limb i) is met as it has been demonstrated that there are no reasons to refuse the proposals that relate to policies in the NPPF that protect areas or assets of particular importance. Dealing with limb ii), it has been demonstrated that there are no adverse impacts associated with the proposals and therefore, the benefits of the proposals cannot be significantly and demonstrably outweighed. This particularly takes into account the high quality designed nature of the proposals.

7.5 As a result, planning permission and listed building consent can be granted.

8 CONCLUSIONS

- 8.1 This Planning Statement has been prepared by Morgan Elliot Planning Ltd on behalf of our client Webster Hart to accompany a householder and listed building consent application for a series of internal works to Coles Farmhouse (List Entry Number: 1022715) at Coles Farm, Alcombe following pre-application advice from Wiltshire Council.
- 8.2 The applicant wishes to sensitively enhance the functionality of the existing dwelling to meet modern living requirements, while safeguarding the architectural and historic significance of the Grade II* listed farmhouse.
- 8.3 It has been demonstrated that the proposals comply with the overall development strategy, and comprise appropriate development in Green Belt terms. It has also been demonstrated that the proposals conserve and enhance the special architectural interest and character of the Grade II* listed dwelling, and comprise a high quality design.
- 8.4 The proposals will not cause any impact on ecology that cannot otherwise be suitably mitigated and enhanced.
- 8.5 This Statement concludes that the proposals comply with the development plan when read as a whole in line with Section 38(6) and can be granted planning permission and listed building consent. It has also been demonstrated that the proposals benefit from Paragraph 11 d) of the NPPF, and that in this context, planning permission and listed building consent can also be granted.

morganelliott
p l a n n i n g

office@morganelliott.co.uk • www.morganelliott.co.uk