

Appendix 1 (to covering letter from Box Parish Council)

Planning application reference number : PL / 2026 / 00168

Proposal : Change of Use of Hazelbury Manor (Grade I Listed), Dower House (Grade I Listed) and The Granary (Grade II Listed) from Mixed Use Residential (C2) to Hotel (Class C1) with Ancillary Parking Hazelbury Manor, Box, Corsham, Wiltshire SN13 8HX.

Site : Hazelbury Manor, Box, Wiltshire

The schedule below sets out commentary on the above planning application under several topics from Box Parish Council included in the response letter to Wiltshire Council.

Topic	Comments from Box Parish Council and action / or information to be provided by the applicant
1.Overview	The Hazelbury Manor estate is situated in the centre of the parish within the Green Belt and the Cotswold National Landscape. It is important for both the community in the Parish and further afield with a rich heritage, a distinctive character and appearance and ‘sense of place’. The Parish Council recognises that the introduction of a hotel enterprise in the Manor, Dower House and Granary elements may help to secure the long-term sustainability of the these buildings and the wider estate. There are, however, several important matters of concern to the Parish Council about this proposal. These arise from :

- the absence of meaningful pre-application discussions to inform the application prior to its submission; and
- the submitted application lacking information or requiring clarification in some specific areas.

These need to be resolved before the proposal can be assessed against the relevant planning policies. The applicant should also have regard to the Cotswold National Landscape Management Plan 2023-2025. The Cotswold National Landscape Management Board should be consulted on this proposal (if not done already).

The Parish Council recognises that some of these matters have already been identified in the consultation responses from other consultees and interested parties (such as Wiltshire Council Ecology and Archaeology units staff, the Society for the Protection of Ancient Buildings (SPAB) and The Garden Trust) and residents in the Parish.

It is unnecessary for the Parish Council's response to re-iterate these matters in its own comments but it would urge the planning authority to make sure that **all** responses are properly taken into account as part of its consideration of the application.

The Parish Council has **no objection in principle to the proposal subject to the following :**

- all matters raised in its own response(s) including the several items set out in the commentary below (and those raised by other parties) are properly addressed and resolved
- a Conservation Management Plan is prepared to show a clear commitment to the built and natural heritage and landscape of the wider Hazelbury Manor estate in which the proposal is situated

	• in the event that the proposal is recommended for approval it is accompanied by robust measures including, where appropriate, a legal agreement and / or planning conditions to ensure that the approved scheme is satisfactory in planning terms. The Parish Council is aware that on March 16 2026, the applicant provided a further Highway Technical Note on Access operation and Public Rights of Way (from Nick Culhane Transport Consultant). The Parish Council will provide comments on this item when the document has been considered.
2.The absence of pre-application discussions	The application documents indicate that no formal pre-application discussions took place prior to the application being submitted. It is a significant concern for the Parish Council that having regard to the recognised importance and significance of the site as evidenced by : • the site being set within the Green Belt and the nationally recognised Cotswold National Landscape • several elements of the proposals being statutorily listed buildings and features (Grade I and Grade II) • the proposals being set within a statutorily listed and registered park and garden (Grade II) • the presence of significant non-designated heritage assets and recent archaeological ‘finds’ within the estate • the estate being within the Bath and Bradford on Avon Special Area of Conservation for bats that there were no such discussions. These would have provided an opportunity for the applicant to show the local planning authority that issues linked to the proposal can, and will, be satisfactorily addressed. As there were no formal pre-

	application discussions, a number of important material considerations will require to be addressed through the process of dealing with the application. The Parish Council is also concerned, that whilst the application was discussed with Historic England before its submission (Planning Statement Executive Summary para. no. 5 and paras. 1.5-1.7) : • there is no firm evidence to support this, • the outcomes from these discussions are not indicated; and • there is no indication of if / how these discussions were taken into account in preparing the scheme. There is no evidence of alternative options to a proposed hotel being explored in discussions with Historic England and the outcomes from this. As a result, it is unclear as to whether Historic England support the approach of the applicant in securing a change of use approval before it has been shown that it will be feasible for the proposals to be satisfactorily accommodated within the estate.
3.The economic and tourism benefits are not specified	The Planning Statement Executive Summary refers to the proposals delivering tourism and economic benefits to the community including the creation of local employment. It is stated that the proposal will make 'a positive contribution to the local economy and Wiltshire's tourism sector' (Planning Statement Executive Summary paras. nos. 1 and 6 and para. 6.6, page 22). The only substantive and quantifiable reference to economic activity is a reference to the likely numbers of staff for the proposal. This is identified as 21-26 FTE staff (Transport Statement para. 10.1 and Planning Statement paras. nos. 6.3-6.5, page 22).

	The Parish Council has since been informally advised by the applicant that this is an <i>initial</i> figure and that in practice the employment will be closer to 100 staff. This significant increase raises important matters such as car parking which are dealt with elsewhere in this response (see no. 7). No detail is provided about what the economic and tourism benefits are likely to be and where they will occur. No explanation is offered as to whether there will be any benefits for the Parish in terms of jobs being created, training opportunities and / or contracts and spend within it. It is unhelpful to have uncertainty and confusion about likely staff numbers. Whilst the potential employment benefits of the proposal may be significant, the application does not adequately explain the practical implications for this important setting of such large staff numbers. There is no detail on where staff will be sourced from. The Transport Statement says that some staff will travel to work by private car (Transport Statement Section 10.3). The Parish Council has since been informally advised in regard to the larger staff number that they will be brought to / from the site by bus. The information about how staff will travel to / from the hotel is contradictory. The Parish Council considers that clarification is needed on : • what constitutes the 'local economy' and how it will benefit from the proposal • what will be the 'wider tourism' benefits from the proposal • staffing (including numbers, where sourced and travel to / from the proposal) It is a concern that the application documents do not identify any specific benefits to the local community including to Box Parish.
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4.The current activities at the Hazelbury Manor estate	Agricultural activities take place within the estate and contribute towards its character. Several features and facilities are identified including glass houses and agricultural barns (Planning Statement para. no. 2.4). Reference is made to opportunities for enhancements to the modern farm buildings on the site in the Heritage Statement (pages 84 and 85) but the Planning Statement does not refer to these. It is unclear if, and how, these will be affected by the proposals. There is reference to an existing squash court in the Heritage Statement (page 85) with narrative that it has the potential to be re-instated or converted but this is not discussed further. The Parish Council considers that clarification is required on if, and how, agricultural activities will continue and how they will be accommodated bearing in mind that some agricultural activities may not be very compatible with a hotel operation. The Parish Council considers that clarification should be provided about any outdoor recreational activities that it is proposed to introduce linked to the hotel (such as shooting) so that the impact on the wider estate (including Public Rights of Way) can be understood.
5.The works proposed to the listed buildings	It is understood that the applicants intend to bring forward necessary applications for listed building consent where works are proposed to listed buildings on the estate. Accordingly, relatively little information is included in the application documents for the change of use about how the proposed hotel use will be accommodated within the fabric and layout of the existing buildings. A comparison between the existing and proposed floorplans shows that some internal walls are proposed to be removed and others provided. Hotel activities / operational matters appear to be intended to be accommodated in existing rooms without these requiring changes (albeit the rooms are re-titled for their 'new' roles).

	The Parish Council considers that clarification about these matters will be helpful.
6.The heritage significance of the Hazelbury Manor estate and the preparation of a Conservation Management Plan	The application documents refer to ensuring that ‘all development principles are underpinned by best practice in heritage management’ and ‘ensuring the proposals are informed by expert advice’ (Planning Statement Executive Summary, para. no. 5 and para. no. 1.5). The application refers to engagement with Historic England as part of the pre-application work. It does not explain the outcome from these discussions nor how this was taken into account in preparing the scheme. The Parish Council considers that as a result it is unclear as to whether Historic England support the approach of the applicant to secure a change of use approval before it has been shown to be feasible for the proposals to be satisfactorily accommodated within the estate and whether the proposals are the most appropriate way of achieving this. The Parish Council strongly considers that the heritage significance of the Hazelbury estate encompasses much more than the statutorily listed buildings / features within it. It is very concerned that neither the Planning or Heritage Statements examine or consider the extensive non-designated heritage assets beyond the main buildings and registered park and garden. There is only limited consideration of how the proposals impact on the registered park and garden features. Some important features such as the Stone Circle are not considered. The significant archaeological features / finds which have been identified in recent years under the previous ownership of the estate have not been considered. Some of the latter are in the vicinity of the proposed car park for hotel guests. It is also a major concern that the application does not consider the importance of the natural environment at the Hazelbury Manor estate. The Hazelbury Common (or Wadswick Common) element of the estate is important in regard to the natural environment since it includes significant invertebrate species. This is not addressed in the application documents.

The Parish Council suggests that the most appropriate means of addressing these several matters is for the application to include the preparation of a comprehensive Conservation Management Plan (CMP) in line with the advice from English Heritage in 'Enabling Development and the Conservation of Significant Places' (2008).

The Historic England website says that :

'In caring for, or managing change in, historic parks, gardens and other landscapes, there are often many features, historic layers and diverse interests to consider. For example biodiversity has to be considered alongside the business and economic viability of the property whether it is a home, agricultural estate, public park, hotel or visitor attraction.

Conservation management plans have been developed as a tool to help pull together an understanding of what matters and why, and how to conserve and manage it. From this informed basis, plans are then used to develop programmes of repair, restoration or to draw up proposals for change'.

Conservation Management Plans are of proven help in identifying what is important and why, and how those important attributes may be conserved and maintained. The preparation of this document can be assisted by the consultation responses already submitted including those from residents with longstanding and detailed understanding and knowledge of the wider Hazelbury estate.

The Parish Council considers that the preparation of a robust CMP will :

- demonstrate meaningful and transparent commitment to the best practice in heritage management to which the proposal explicitly aspires (as set out in the Planning Statement)
- provide a baseline assessment of the estate in terms of its historic and natural environment significance

	• identify threats and opportunities • enable the development of a holistic vision for management of the entire estate. The Parish Council also considers that the preparation of a CMP will : • be a useful means of helping to raise the profile of the hotel enterprise • help to secure recognition for the proposal as ‘best’ or ‘good’ practice in regard to schemes which are similar in content or context • provide an opportunity for the development of the project to engage in a positive manner with stakeholders within the local community. The Historic England website also references ‘The Management and Maintenance of Historic Parks, Gardens and Landscapes’ (2007) as a helpful guide and this may assist the applicant.
7.Sustainable transport and parking (guests and staff)	The Transport Statement is ambiguous about the location of the site. It characterises the site as having an ‘edge of settlement / semi-rural location’ and ‘edge of town location (Transport Statement para. 10.3 and Section 2, respectively). The application documents say the proposal is acceptable in policy terms in regard to sustainable transport modes (Transport Statement, Section 9). The Parish Council points out that that irrespective of the ambiguity in the Transport Statement in reality the site is in open countryside well away from nearby settlements with a wholly rural location. It currently has relatively limited public transport availability (even during the day and especially in the evening). The highway here is not illuminated and there is no footway for pedestrians. The verges are grassed and uneven.

	The nearest bus stop (on the B3109 Bradford Road) is some distance from the main buildings as these are located well within the site*. The Parish Council would expect most guests to arrive by private car. It notes that the intention is for staff to be brought in by private bus and taken away by bus. *the applicant's Transport Statement notes that the principal bus service is the X83 and 'is aligned to peak education travel periods' and in regard to the possibility of parking overspill beyond the site says that 'the Manor is <i>so far</i> from the adopted public highway.....' The Parish Council considers that the conclusion in the Transport Statement that the proposal meets sustainable transport requirements is unrealistic. The location of the proposed hotel guest car park has been identified in order to be the least impactful on acknowledged heritage assets and its detailed design would seek to ensure minimal environmental impact (Planning Statement paras. 3.9 and 3.10)*. *The Transport Statement refers in error to parking standards in the Corsham Neighbourhood Plan. The Parish Council considers that the proposed car park for hotel guests should be : • the subject of a separate planning application / listed building consent application rather than part of this change of use application • be subject to a detailed archaeological investigation of the site (along with adjoining areas) in the light of recent archaeological 'finds' in this part of the estate. The Parish Council notes that some parking is envisaged for staff (Planning Statement para. no.3.7). It says that staff car parking will be provided across the rest of the estate on existing parking areas (Planning Statement para. 5.26 and Transport Statement Section 10.3).
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	No information is provided on how much parking will be provided nor its locations. The provision of staff car parking is contrary to informal advice on behalf of the applicant that staff will arrive and depart by bus (and how many staff will be involved). As identified above, the Parish Council considers clarification is needed on staffing levels and how staff will arrive and depart. This is needed to inform consideration of : • the quantity of parking provision necessary for staff • the optimal locations for this having regard to the importance of not adversely affecting the setting of the buildings and gardens and avoiding adverse impacts on existing trees.
8.Maintaining and improving public access to the Hazelbury Manor estate	The application refers to ‘public access’ to the hotel (Planning Statement paras. 2.14 and 6.5) but it is not clear what this will encompass. The previous owner of the estate enabled the wider community to enjoy the wider Hazelbury estate by means of the several existing Public Rights of Way (PRoWs) close to the estate and within it. There were also a number of ‘open’ garden events that the community could visit and enjoy. The Parish Council considers that clarification is required about what public access will encompass (including whether non-hotel residents will be able to use the hotel facilities). If public access is to remain then a re-assessment of both likely car parking requirements and vehicle ingress / egress will be necessary. The Parish Council seeks confirmation that the existing rights of way within the estate will remain available for use by the wider community. The Parish Council is also very concerned that, as submitted, the proposals will lead to an increase in vehicles (including commercial vehicles) on the two existing PRoWs within the site. The proposals are

	likely to exacerbate the likelihood of conflict between users of the rights of way (walkers and horses) and vehicles. The Parish Council considers that the proposals should be amended within the application site to avoid the potential for conflict between users and road safety hazards by including measures to ensure safety for non-vehicle users such as widening and passing places (refuges). The Parish Council strongly supports the work of the Cotswold Voluntary Wardens. It is aware that some improvements are currently being made to the PRoWs at the estate including walling repairs, re-surfacing of parts of the network and addressing localised flooding issues on the network. The proposal provides a valuable opportunity to : • undertake a comprehensive review of PRoWs; and • identify the scope for further improvements in facilities linked to these (such as the work mentioned already and new stiles and fingerposts) across the estate. This would benefit any guests staying at the hotel who wish to explore the surrounding countryside as well as non-residents who are using the countryside PRoW network. The Parish Council is aware that on March 16 2026, the applicant provided a further Highway Technical Note on Access operation and Public Rights of Way (from Nick Culhane Transport Consultant). The Parish Council will provide comments on this item when the document has been considered.
9.The proposed vehicle access and egress to the Hazelbury Manor hotel	The Planning and Transport Statements say that vehicle access and egress into the site will be by means of the existing links to / from the B3109 Bradford Road. It will be based on the introduction of a one-way system using these links.

	All ingress to the site would be taken from the southernmost access and all egress from the site taken from the northernmost access. Both these links are currently public rights of way (a footpath and a bridleway). Specifically, the southern link (the proposed 'in' route) is a public footpath (BOX54) and the northern link (the proposed 'out' route) is a bridleway (BOX51).The proposed vehicle and pedestrian egress from the site is very close to the access to the Wadswick Country Store which is on the opposite side of Bradford Road. Other than by becoming part of the proposed new one-way system, there are no proposals to amend these features (by widening or providing passing places) nor improvements proposed to the junctions with Bradford Road. The Parish Council is very concerned that the proposals : • do not include improvements to the junctions of the vehicle access and egress points with the B3109 Bradford Road • do not include measures on the Bradford Road to allow traffic to enter and leave the site safely. The Parish Council is aware that on March 16 2026, the applicant provided a further Highway Technical Note on Access operation and Public Rights of Way (from Nick Culhane Transport Consultant). The Parish Council will provide comments on this item when the document has been considered.
10.Trees and hedges	The planning application form says in the section on Trees and hedges that there are no trees or hedges on the development site and there are no trees or hedges on land adjacent to the development site which might be important to local character.

	The Planning Statement does not refer to trees even though the application site is well-treed and the wider estate includes ancient woodlands and veteran trees and the setting includes a statutorily listed Registered Park and Garden. Figure 5 in the Planning Statement suggests that there are several trees in close proximity to the key buildings and proposed car park (or will be if these are additional trees to be planted). The proposed car park for hotel guests is in close proximity to several mature trees. Existing trees may be affected by works to the buildings and / or the construction of the car park. The Parish Council consider trees are an integral part of the wider setting for this proposal and should be fully taken into account. The proposal should include a tree survey in order that the implications of the proposals (including during the construction phase) can be assessed. The Parish Council is aware that works to trees have been taking place. The Parish Council considers it will be appropriate to consider the preparation of a Tree Preservation Order across the estate. The preparation of a Conservation Management Plan should include consideration of trees.
11.Operational matters for the proposed hotel (including servicing and waste)	The application shows that operational facilities for the hotel (such as kitchens, stores and offices) will be accommodated in the existing buildings without further alteration. It also says that the servicing will be 'infrequent' (Transport Statement Section 11) but no substantive detail is provided on this. Information is required about servicing arrangements in order that the impact of these can be assessed. No evidence is provided on what the position is of Historic England on the necessary operational facilities for a proposed hotel being accommodated within the heritage fabric.

	The application form says that the proposals do not include facilities to store and aid the collection of waste and that no arrangements have been made for the storage and collection of recyclable waste. The Parish Council envisages that a proposed hotel will generate waste (including material that should be recycled). The proposal should explain how this will be dealt with. The application form says that the proposal will be linked to the main sewer and will not be connected to the main drainage system. The Parish Council considers that further detail is needed in order that the implications for the setting and potential archaeological features can be assessed (including any necessary pumping facility given that the main sewer is understood to be some distance away). It is recognised that it is intended to prepare further applications for listed building consent for works to the buildings. As there is no evidence from the discussions with Historic England, it is unclear if that body considers it will be feasible to address matters such as the provision of extractor and fire separation measures. It will be important to ensure that the cumulative impact of works to enable and support the introduction of a hotel operation do not adversely impact on the character and fabric of the buildings.
12.Lighting implications of the proposals	No detail is provided about lighting for the hotel and its ancillary spaces (including the proposed car park). The proposed use as a hotel is likely to require lighting of external areas (such as the pedestrian and vehicle access and egress routes, the proposed guest car park and 'circulation' spaces around the buildings) that is very different to what is in place for the existing private residential use. External

	lighting linked to the hotel use will have the potential to have a significant impact on the estate generally and in specific locations within it as well as further afield. Explanation is required on how such features will be provided in a way which will minimise adverse impacts on ecology and 'dark skies'. The applicants should have regard to the Cotswold National Landscape Management Plan 2023-2025 in regard to lighting and dark skies (and other relevant matters). The preparation of a Conservation Management Plan should include consideration of lighting.
13.The ecological implications of the proposals	The application documents say that as only limited amount of change is required to the existing buildings this will have very little direct ecological impact including on bats (Planning Statement para. 5.32 - 5.33). Whilst reference is made to flood-risk (Planning Statement para. 5.29) there is no mention of watercourses and ponds which are an integral element in the wider estate. The Parish Council supports the need for a more detailed consideration of impacts on ecology (as identified by the Wiltshire Council Ecology team) so that potential impacts can be identified including on the Bath and Bradford on Avon Special Area of Conservation for bats as the wider estate is situated within this. There are a number of water features within the estate and the preparation of a Conservation Management Plan should include consideration of water features as these contribute to local biodiversity.

14. Other matters	Proposals were submitted in autumn 2017 to Wiltshire Council (reference : 17/12461 /OUT) for Tottenham House and Garden, near Marlborough, Wiltshire. The proposal was : Hybrid planning application: 'Full application' for change of use and some extension/alteration of Tottenham House and grounds to residential use (C3 use) from educational use (C2 residential institution) and ancillary leisure development, related staff accommodation, and associated landscape works; 'outline application' for outlying related family houses and further related staff accommodation. The proposal involved a number of highly significant features which are all statutorily listed including: • Tottenham House (Grade I) • Stable block (Grade II*) • Garden Folly (Grade II*) • Underground kilns (Scheduled Ancient Monument) Part of the site in the vicinity of Tottenham House is a Registered Park and Garden (Grade II*) and the whole site (almost 420 hectares) is within the North Wessex Downs Area of Outstanding Natural Beauty. The site includes several protected species (including great crested newts, badgers, birds and bats. Whilst : • The site of the Tottenham House proposal is considerably larger than the site at Hazelbury Manor • much of the existing built development is on the heritage at risk register; and • the proposal includes some enabling development
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it has some parallels with the current application at Hazelbury Manor because of its heritage elements, its setting, the natural environment and, because of these factors, the relevant planning policies.

Importantly, it is also noted that the proposal was prepared by **Rural Solutions** who are the agents involved with the Hazelbury Manor proposals.

The Planning Statement and the extensive supporting documentation for Tottenham House is very comprehensive and examines many issues pertinent to Hazelbury Manor. The documents include :

- a Vision Statement,
- a suite of heritage themed documents (including a Conservation Management Plan),
- a landscape management plan,
- a parkland tree management plan,
- a landscape visual impact study,
- an ecology assessment, an archaeology statement,
- a headline economic outputs report
- specific reports on topics such as food, energy, water and transport.

The documents also detail an extensive background of pre-application engagement from 2016 with:

- Wiltshire Council
- the local community; and
- specialist bodies such as Historic England.

The key outcomes from these and the main points of agreement are clearly documented.

	There is extensive information on the expected economic benefits from the proposal and an explanation of likely social and community benefits. The Planning Statement provides a thorough assessment of the proposals against all relevant planning policies (including the NPPF and Wiltshire Core Strategy) and it explains how the proposals are considered to satisfy these. The Planning Statement concludes with an appendix setting out suggested draft planning conditions. In comparison, the submitted Hazelbury proposals : • lack detail on the outcomes from the engagement with Historic England and do not indicate whether this agency supports the proposals or not • does not include an examination of any alternative options to the proposals • set out what the planning policy context is but does not demonstrate how the proposals satisfy the relevant policies. The Parish Council acknowledges that the Tottenham House proposals are much larger than those for Hazelbury. However, it considers that many of its concerns (as outlined above) will be addressed if the supporting documents for the Hazelbury proposal are as thorough and cover the relevant topics in as much depth and detail. The Parish Council considers that the application documents for Hazelbury should be revised and / or expanded to address these matters in line with the coverage provided by the agents (Rural Solutions) in their documents for Tottenham House and Garden.
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March 16 2026