

Dear Lucie Turner

Planning application reference PL / 2026 / 00168 – Hazelbury Manor, Box, Wiltshire SN13 8HX.

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.

Thank you for providing Box Parish Council with an opportunity to comment on the above proposals.

As advised, the matter was discussed by the Parish Council Planning Committee at its meetings in February and March 2026. It is helpful that you have been able to accommodate this.

The Parish Council has set out its comments below. An attached document (Appendix 1) provides a fuller explanation of the comments and the reasons for them and should be read in conjunction with this letter.

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 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.

There should also be an explanation of any alternatives to a proposed hotel that were examined through an Options Appraisal.

The Parish Council strongly considers that these matters need to be resolved before the proposal can be assessed against the relevant planning policies.

In undertaking further work, the applicant should also have regard to the Cotswold National Landscape Management Plan 2023-2025. The Management Board should be formally consulted on this proposal (if not done already).

Some of the matters covered in the Parish Council response also are also referred to by other consultees and interested parties (such as staff from the Wiltshire Council Ecology and Archaeology units, the Society for the Protection of Ancient Buildings (SPAB) and The Garden Trust) and residents in the Parish.

The Parish Council's response does not re-iterate these matters but it would urge the planning authority to make sure that **all** responses are properly taken into account and addressed as part of the 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 items in the commentary below and in Appendix 1 (and those raised by other parties) are properly addressed and resolved
- a Conservation Management Plan is prepared to show a clear commitment to the historic, 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 detailed comments for the Parish Council are set out below in items nos. 1-14 corresponding to the attached Appendix. The order of the points does not indicate any priority.

Detailed comments

2.The absence of pre-application discussions

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 involving 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'

- the estate being within the Bath and Bradford on Avon Special Area of Conservation for bats

that there were no formal pre-application discussions with Wiltshire Council.

Such discussions 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 a result, a number of important material considerations will require to be addressed through the process of dealing with the application.

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). There is no explanation of how this will be implemented or achieved. There is no firm evidence to support this, no outcomes from these discussions are indicated and there is no indication as to how the discussions have been 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 principle of 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.

These matters are also mentioned in no. 14 (below).

3. The economic and tourism benefits of the proposal are not specified

No detail is included in the application about its economic benefits.

The application documents indicate that between 21-26 FTE staff will be employed at the hotel (Transport Statement para. 10.1 and Planning Statement para. nos. 6.3-6.5, page 22). However, the applicants have since informally advised the Parish Council that the likely number of staff will be closer to 100. [If the latter figure is correct then this also has implications for the proposed car parking for staff].

The Parish Council considers that clarification is needed on :

- what constitutes the 'local economy' and how it will benefit from the proposal (including jobs created, training opportunities and contracts / spend within it)
- what will be the 'wider tourism' benefits from the proposal
- staffing (including numbers, where sourced and travel to / from the proposal)

The Parish Council is concerned that the proposals do not identify any specific benefits to the local community.

These matters are also mentioned in no. 14 (below).

4. The current activities at the Hazelbury Manor estate

The Parish Council considers that clarification is required on if, and how, agricultural activities at Hazelbury Manor estate will continue and how they will be accommodated bearing in mind that some agricultural activities may not be very compatible with a hotel operation.

Reference is made in the Heritage Statement to enhancements to modern farm buildings but these are not mentioned in the Planning Statement. Reference is also made to a squash court having the potential to be re-instated or converted but this is not 'followed through' into the Planning Statement.

The Parish Council considers that clarification should also be provided about any outdoor recreational activities that it is proposed to introduce linked to the hotel (such as shooting) so that the impact(s) on the wider estate (including Public Rights of Way) can be understood and assessed (see no 8 below).

5. The works proposed to the listed buildings

Relatively little information is provided about how the existing buildings will be altered to accommodate the proposed hotel use other than to identify on existing and proposed floorplans features such as walls which it is intended to remove or provide and how current rooms will be 'repurposed' for hotel related functions.

It is not clear whether detailed advice has already been provided from Historic England and if this has been followed.

There is no indication that the proposals are the outcome from any feasibility / option studies so the implications for the buildings cannot be properly assessed.

Clarification on these matters will assist the Parish Council.

6. The heritage significance of the Hazelbury Manor estate and the preparation of a Conservation Management Plan

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 the application documents do not examine or consider the extensive non-designated heritage assets beyond both the main buildings and registered park and garden. There is only limited consideration of how the proposals impact on the latter.

Some important features such as the Stone Circle are not considered.

Significant archaeological features / finds have been identified in recent years under the previous ownership of the estate but 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.

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 applicant may also be assisted by 'The Management and Maintenance of Historic Parks, Gardens and Landscapes' (2007) which is identified on the Historic England website.

These matters are also mentioned in no. 14 (below).

7. Sustainable transport and parking (guests and staff)

The Transport Statement is ambiguous about the location of the site referring to it as both an 'edge of settlement / semi-rural location' and an 'edge of town location' (Transport Statement Section 2 and para. 10.3, respectively).

The Parish Council considers that the site has a wholly rural location as it is in open countryside and positioned well away from nearby settlements.

The site has relatively limited public transport availability (even during the day and especially in the evening). 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 highway here is not illuminated and there is no footway for pedestrians. The highway verges are grassed and uneven.

The Transport Statement notes that the nearest 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 *so far* from the adopted public highway.....' The Parish Council would, in practice, expect most guests to arrive by private car.

The Parish Council considers that the conclusion in the Transport Statement that the proposals meets sustainable transport requirements is unrealistic.

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
- 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 across the rest of the estate on existing parking areas (Planning Statement paras. no.3.7 and 5.26 and Transport Statement Section 10.3).

No information is provided on how much staff car parking will be provided nor its locations. The provision of staff car parking is contrary to recent informal advice on behalf of the applicant that staff will arrive and depart by bus (and how many staff will be involved).

The Transport Statement refers in error to parking standards in the Corsham Neighbourhood Plan.

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 previous owner of the estate allowed public access to the estate by means of the Public Rights of Way (PRoW) network and on specific occasions such as 'open' gardens.

The Parish Council considers that clarification is required about what future public access will encompass including whether non-hotel residents will be able to use the hotel facilities (Planning Statement para. nos. 2.14 and 6.5). If public access is to remain then a re-assessment of likely car parking requirements and vehicle ingress and egress arrangements will be necessary.

The Parish Council seeks confirmation that the existing PROWs 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 arriving and departing guests and commercial vehicles servicing the hotel) on two of the existing PROWs within the site. The proposals are likely to exacerbate the likelihood of conflict between PROW users (walkers, horse riders 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 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 across the Parish and beyond. It is aware that some improvements are currently being made by this group to PROWs at some locations within the estate including walling repairs, resurfacing and addressing localised flooding issues.

The Parish Council strongly considers that this proposal provides a valuable opportunity to :

- undertake a comprehensive review of PROWs across the wider estate; and
- identify the scope for further improvements in facilities linked to these (such as new stiles and fingerposts).

9. The proposed vehicle access and egress to the proposed Hazelbury Manor hotel

The Parish Council is very concerned that there are no proposals to amend existing routes into and out of the site that will form the proposed new one-way ingress and egress system by providing widening or providing passing places.

The 'Northern Road' (bridleway) is almost opposite the entrance to Wadswick Green/Wadswick Country Store. There is no reference to the effect that traffic coming in and out of those 2 premises on the safety of the road at that section of the B3109. Wadswick Country Store in particular has significant traffic in both directions by virtue of customers and suppliers to the business. Wadswick Country Store is a thriving retail outlet, which includes a cafe and other amenities, including in the future some sports activity. Box Parish Council feels that the planning application should take account of this when considering the safety of users of the B3109 at that point.

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
- include measures on the Bradford Road to allow traffic to enter and leave the site safely.

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. No reference is made to trees in the Planning Statement.

In fact, the application site is well-treed and the wider estate includes ancient woodlands and veteran trees. The wider setting includes a statutorily listed Registered Park and Garden. The photographs in the Heritage Statement confirm the extensive tree cover in the vicinity of the proposed hotel.

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.

The Parish Council consider trees are an important and integral part of the wider setting for this proposal. The proposal should correctly identify the current tree and hedge cover and should take it fully 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 for the preparation of a Tree Preservation Order across the estate to be considered.

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 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.

No evidence is provided on the position of Historic England on the necessary operational facilities for a proposed hotel being accommodated within the heritage fabric.

The Parish Council considers 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 also needs to be confirmed if Historic England consider that important matters such as extractor equipment and fire separation measures can be introduced without adversely impacting on the historic fabric both individually and cumulatively.

12. Lighting implications of the proposals

Explanation is required on how lighting for the hotel and ancillary spaces (such as the pedestrian and vehicle routes, the proposed guest car park and 'circulation' spaces around the buildings) 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 Parish Council strongly 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 given that the estate is situated within this.

The preparation of a Conservation Management Plan should include consideration of existing water features as these contribute to local biodiversity.

14. Other matters

The preparation of additional information and evidence will help this proposal to be properly considered.

The Parish Council considers that there are some important and useful parallels with the proposals being progressed for Tottenham House and Garden at Marlborough (under planning application reference no. 17 / 12461 / OUT). These are more fully identified in no.14 of Appendix 1 to this letter.

It considers that reference should be made to the suite of documents in that proposal to inform the preparation and undertaking of the further work needed on this application.

15. Next steps

The Parish Council will be pleased to be advised of the further progress with this application including any updated and / or additional documents in response to its comments.

If you need any further information or clarification then please do not hesitate to get in touch with the Parish Council.

Yours sincerely

Chairman of the Parish Council / or

Parish Clerk