

PL/2026/00168

Hazelbury Manor, Bradford Road, Hawthorn, Corsham, SN13 8HX

Change of use of Hazelbury Manor (Grade I listed), Dower House (Grade I listed) and The Granary (Grade II listed) from mixed used, residential (C3) and agricultural, to hotel use (C1) with ancillary parking.

Commentary on Consultation Responses: Heritage issues

INTRODUCTION

A planning application has been submitted for the change of use of the main buildings of the Manor from mixed use, residential (C3) and agricultural to hotel use (C1) and includes for the provision of associated car parking.

The buildings are listed, Grade I and Grade II and sit within a registered Park and Garden (grade II). As explained in the Planning Statement (Rural Solutions) this planning application is the first stage in the process towards securing a long-term sustainable use for the country house estate. Establishing the principle of the hotel use is essential to ensure a firm foundation to support the necessary substantial investment needed to advance the subsequent applications with their supporting reports and studies. Delivering the masterplan that has at its heart the objective to sustain and enhance the heritage significance the site holds is a huge responsibility and so is being progressed thoughtfully and in stages, with advice and input from key stakeholders.

This planning application has generated a number of comments from consultees and other members of the public, some in support and another raising some concerns. Commentary also includes some detailed descriptions of the Estate's landscape features.

The consultation responses with dates received are as follows:

Respondent	Date
Gardens Trust	18/02/26
Public Rights of Way Officer	18/02/26
SPAB	05/03/26
C20 Society	09/03/26

Open Space Society	11/03/26
Cotswolds National Landscape Board	12/03/26
Historic England	17/03/26
Box Parish Council	17/03/26
<u>Wiltshire Council</u>	
Archaeology	13/02/26
Highways	13/02/26
Ecology	23/01/26
Local residents/individuals	

Worlledge Associates have been instructed by the applicant to provide comment on the heritage matters raised. In doing so it is important that these comments are read in conjunction with Planning Statement (Rural Solutions), the Heritage Report, and the Setting and Car Park Report (Worlledge Associates) that accompanied this application.

SUMMARY OF HERITAGE-RELATED COMMENTS

- Principle of the change of use is acceptable. SPAB and Parish Council suggest an Options Appraisal to justify Hotel use, however Historic England consider the proposed change of use is acceptable in principle as there is clear potential for the listed buildings to accommodate hotel use, which could deliver an optimum viable, long-term use.
- A hotel is an exciting prospect. Perhaps the gardens can be opened to the public once a year.
- This new use is what the property needs to remain a 'functioning heritage asset'.
- Proposed parking is within an area of archaeological interest. A condition to secure archaeological investigation is recommended.
- A conservation management plan should be commissioned to outline the care and protection of the historic features and landscape.
- Other than for the car park there is little assessment of the impact of the proposals on the Registered Park and Garden.
- Further research and assessment is required to assess impacts:
 - To better understand the significance of 'all aspects' of the RPG
 - The stone circle is of significance and not mentioned
 - Significance of water features

- Yew henge and 'prospect mounds' are important contemporary landscape features to be preserved
[note: the Yew Henge no longer exists and has not since at least 2004]/
- Ancient woodlands are irreplaceable.
- The registered park and garden may merit consideration for review to include the surrounding Pollard landscape.
- The features created by Pollard are of local significance and should be added to a 'local list'. Wiltshire Council does not have a 'local list' and relies on the Wiltshire HER to 'capture buildings of local interest'.
- Heritage report fails to identify landscape features that are recorded in the Wiltshire HER
- Heritage statement does not assess the extent to which views can alter between the seasons, or identify all the important views
- Opportunity to replace modern roof coverings on the historic barn with a traditional pitched roof and roofing materials.
- Consideration of the full significance of the twentieth-century fabric required when applying for listed building consent (C20th society).
- Other matters were raised about agricultural holding, and the public rights of way - these non-heritage matters are addressed in the additional response prepared by RSL which should be read in conjunction with this response.

CONTEXT

The current application is to establish the principle of the change of use. Consequential works will be the subject of separate planning and/or listed building consent applications. The higher level and the broad scope of works have been and will continue to be discussed with Historic England and Wilts Council, in the acknowledgement that working collaboratively and sharing the challenges will help secure the positive outcomes everyone wants.

In relation to this planning application the approach has been to submit sufficiently detailed information to ensure that the site's heritage significance can be understood and the nature and extent of impacts anticipated. Government recognises in its advice, to properly manage the onus and complexities of the development management process that *'The level of detail (submitted with an application) should be proportionate to the assets' importance and no more than is*

sufficient to understand the potential impact of the proposal on their significance' (NPPF para. 207).

This is not to avoid appropriate investigation and analysis, it is much more to manage the process and the associated risks of potentially abortive costs.

Hazelbury Manor's designations at national level clearly indicate the cultural, historical, social, recreational and ecological significance and value. The applicant is fully aware of this – it is, after all, its heritage significance that people value and enjoy that makes it attractive for the proposed use. Through this proposal to then be able to share the site's heritage with others would improve access to and enjoyment of our historic environment. It is a high priority, not least for the owner's benefit (to be able to make informed decisions) but also for key stakeholders, to ensure that the proposals are informed by an understanding of the site and that the site's long term care is properly managed.

COMMENT

Taking the key heritage related themes identified in the consultation responses:

1.0 A Conservation Management Plan. The Heritage Lottery Fund explains the scope and purpose of a conservation management plan (Conservation planning good practice guidance, 2024). It should describe the heritage assets, why they are valued and who values them, challenges and opportunities. This will then inform decisions about change and management. The owner has already embarked on the first stages of such a plan, gathering information about the estate and its condition. This is already being used to inform decisions and in due course, once there is certainty about proposed development, this will be used to help manage the long term future. Conservation management plans are most commonly used to support HLF funding applications (or other public funding sources) for assets that are public accessible. For a private property there is no mechanism to demand, predetermination, that an application is supported by such a plan. That said, all the components that make up a management plan will be integral to the owner's investment and long term commitment to the effect management of the site.

2.0 Scope of Assessment. As outlined above, the information provided at this stage is proportionate and sufficient to understand the potential impact of the change of use. It is anticipated that further work will be undertaken prior to and as part of the development of detailed proposals for works to the listed assets.

3.0 Further Research. Once the principle of a use has been established the detailed research and analysis of the site's significance will be used to inform the next stages. It should be pointed out that the National Heritage List entry for the gardens is descriptive. It is not an assessment of significance, and that Ian Pollard's interventions and additions are mentioned in the list description is not confirmation of significance. The focus of this application is to establish the principle of a change of use, if and when the next stage is embarked upon, Pollard's work may well be a subject for further discussion. It should be noted though that the Yew Henge (referred to by the Gardens Trust) no longer exists, grubbed up by the previous owner.

4.0 Wiltshire Historic Environment Record (HER). As has been pointed out Wiltshire Council does not have a 'local list' or an agreed assessment criteria but that does not mean the Wiltshire HER becomes the list. That there is a site, feature or building entered into the HER does not confer significance, or imply that the subject matter can be defined as a non-designated heritage asset. Historic England sets out the general criteria that should be used to assess heritage value and also explains that any process of assessment should be transparent, subject to consultation and endorsement. The research that supports the Heritage Report (Worlledge Associates) included interrogating the HER. With regard to the two mounds and the stone circle, the stone circle does not feature on the HER and the entry for the two mounds was updated on the HER on 15th January 2026 (after the Heritage and Setting Reports were published in December 2025). Prior to this, they were recorded as 'of unknown origin' on the HER. See extracts from HER below.

HER entries:

Record number MWI63572

Landscaped Feature, South of Hazelbury Manor

A double ring of earthworks and planted trees can be seen on aerial photographs. They are of unknown date, but may relate to the 17th century landscape gardens of Hazelbury Manor.

[Note: This is what remains on the 'Yew Henge', 20th century origin]

Record number MWI44964

20th Century Prospect Mounds at Hazelbury Manor

Source Detail: Wiltshire County Council, 2001

Title: Wiltshire Council Aerial Photography

Summary: No summary information. Source ID: SWI22142

Description: Mounds can be seen on aerial photographs. Their date is not known. They were possibly built as prospect mounds within the landscape gardens of Hazelbury Manor.

Source Detail: Tye, V., 2026

Title: Email from Varian Tye To Wiltshire Council Archaeology Service dated 15.01.2026

Summary: No summary information. Source ID: SWI31733

Description: Outside the registered garden are prospect mounds constructed by Ian Pollard in the 20th century.

It is now understood that the stone circle and two mounds were constructed during Ian Pollard's ownership of the Manor, without the benefit of planning permission (or other necessary licences or consents) during which period he undertook a range of landscaping and building works. Oral histories suggest that the two mounds derive from the excavated material from the swimming pools that Pollard introduced within the walled gardens to the north of the house (covering over a part of the archery lawn).

An English Heritage description of the grounds (in 1990s) identifies the structures:

The gardens are ringed by farmland. The area to the north of the gardens, outside the wall, has recently been planted as a pinetum and the field to the south-west, as a series of rides. Other new (late C20) features include a replica of stonehenge planted in yew, and a pair of earth mounts, one in the field of new rides, the other standing in a field to the north-west beyond the late C20 haha. Like the rest of the late C20 work, this has been carried out by Ian Pollard who was owner of the property for twenty years in the late C20.

In July 1990 the gardens to Hazelbury Manor were included in Register of Historic Parks and Gardens, listed grade II. The listing references the remains of an early 17th century garden, restored in the early 20th century (Brakspear), and extended in the late 20th century (Pollard). The site of the two mounds and the stone circle are not included within the listing, though clearly, they were in place by the time of the listing.

A contemporary account of the structures in a Country Life article (1991) describes the features (neolithic mounds and a circle of dolmen) as a hoax and fakery in the manner of Pollard's characteristic humour.

The historic environment is defined in the National Planning Policy Framework as: *'all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged....'*

A heritage asset is a component of the historic environment *'identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).'* (NPPF Annex 2: Glossary)

This makes clear that there are two types of heritage asset; those that are 'designated' (buildings and sites included in the National Heritage List for England and Conservation Areas) and those that are 'non-designated' – identified by the local planning authority.

Historic England in its publication 'Local Heritage Listing: Identifying and Conserving Local Heritage' (HEAN7, 2021) sets out good practice advice on the process for identifying suitable candidates and some general relevant criteria.

It explains in paragraph 1 that non designated heritage assets can be identified in a number of ways, including through:

- Local heritage lists
- Local and Neighbourhood Plans
- Conservation area appraisals and reviews
- Decision-making on planning applications

The guidance explains that Inclusion on a local heritage list based on sound evidence and criteria delivers a consistent and accountable way of recognising non-designated heritage assets, no matter how they are identified, to the benefit of good planning for the area and of owners, developers and others wishing to understand local context fully. In paragraph 5 Historic England explains that:

Importantly, this advice should be seen as a starting point in the management of local heritage. In order to remain flexible enough to respond to local needs, decisions on the ways in which assets are identified, and the system adopted for managing the local heritage list, are matters for local planning authorities and their communities, including neighbourhood planning bodies in their area.

It also explains (in paragraph 17) that identification of non-designated heritage assets and a 'local list' will have greater legitimacy and weight in planning decisions if prepared in accordance with defined selection criteria and has been subject to public consultation.

The guidance then offers a list of commonly applied criteria for assessing the suitability of assets for inclusion in any local list of non-designated heritage assets, explaining that *'it is important that the community develops criteria which respond to the local heritage of their area'*. (paragraph 35).

Whilst the Wiltshire Council Core Strategy (CP58) recognises the contribution that non-designated heritage assets make to a sense of local character and identity and seeks to conserve that contribution, there is otherwise no locally agreed criteria for nominating non-designated heritage assets and no local list.

It would be reasonable to conclude that the three structures identified as having significance (in the consultee comments), as engineering operations, would have required require planning permission for which there is no evidence that such permission was obtained. Likewise, there is no evidence of planning permission being applied for an obtained for the extensive rockery/ engineering works adjacent to the Granary. The effect of these works being undertaken without consent is such that the local planning authority and Historic England were denied the opportunity to be involved in assessing the impact these works would have on the setting of the affected heritage assets (and the authenticity of the historic landscape). This may have affected the outcome of any decision. Given that the structures sit within the setting of the historic gardens and grade I listed house it may have been that some concern would have been raised about the introduction of these 'follies' and the effect that they would have on the historic integrity and genuine time depth of the designated heritage assets.

The Parish Council's consultation notes suggest that the structures would be eligible for inclusion as non -designated heritage assets because they hold 'designed landscape interest' complementing the Grade II registered garden.

Measured against Historic England's general criteria as set out in the published advice (HEAN7) it can be concluded:

ASSET TYPE: Landscape feature

AGE: Modern, Constructed in the 1980s, not significant for age

RARITY: As modern structures rarity is not relevant.

ARCHITECTURAL & ARTISTIC INTEREST: They lack authenticity and do not form part of a wider coherent designed landscape. That there are two 'viewing mounds' discredits the notion that they are carefully planned to reflect historic precedents or that they exist to offer 'designed' views.

GROUP VALUE: It is arguable that the structures 'complement' the designed landscape (the 17th century registered garden). If indeed, as Professor Mowl is quoted as claiming, that the garden '*has to be ranked among the great gardens... of Europe*' then it is certainly not in the interest of preserving and enhancing the garden and its setting to endorse the introduction of what is described by Country Life as fake archaeology.

Rather than introducing viewing mounds by design to compensate for the house's enclosed and intimate location within a hollow in the landscape and thus limited views out, the evidence suggests that they were structures introduced to be able to dispose of excavated material from the swimming pool and no more than that. The structures are separate from the historic buildings and

garden with no inter-visibility and do not add 'group value'. It is clear from the high grading of the house and the inclusion of the garden in the register that historic integrity and time depth are fundamental to the site's special interest. These are isolated modern follies that do not add to that historic integrity.

5.0 Winter and Summer Views. That the Heritage Report assesses the views when the trees are in leaf is not to suggest that the winter view has not been considered or to suggest an attempt to conceal the nature and extent of impact. Both the report authors and Council officers will be familiar with the way views may change through the seasons and will be taken into account when assessing the nature of impact.

6.0 C20th Phase of Development. It is suggested that the bathrooms may be by Brakspear., and loss of sanitaryware may be a concern. However, it is clear that these are all 1990s interventions and hold no significance in relation to this early twentieth century phase of change.

It is asserted that the loss of any Pollard-designed features, such as the Yew Henge and Prospect Mounds would result in harm to the site's heritage significance. The mounds have already been discussed above, and it is contested that these features hold any significance that would merit consideration as an important part of the site's history. It will be noted that the Yew Henge has not existed since at least 2004 (Noted in Timothy Mowl's description within the publication in 'Historic Gardens of Wiltshire' (2004)). In any event this application does not involve proposals that would affect these Pollard works.

7.0 Setting - Whilst no specific comments were raised concerning the impact on setting, the Heritage Impact Assessment submitted with this application specifically deals with the impact of the proposed car park. In any subsequent planning and listed building consent applications, the required heritage impact assessment will assess any direct and indirect impacts on the setting of all the heritage assets of the site.

8.0 Options Appraisal

An Options Appraisal for possible uses of the site is provided in Appendix 1 of this document.

CONCLUSION

The involvement and expert advice of the Historic England, Gardens Trust, SPAB and C20th Society are welcomed, and we would like the opportunity to engage in a dialogue on behalf of our

client, to further discuss the points raised. The comments and clarification raised above illustrate the risks of desk-based assessments and the benefits of on-site assessments to confirm documentary evidence and oral histories.

The non-designated structures and features that have been highlighted above sit within the setting of the listed house (and other listed buildings) and form part of the setting to the registered garden. This means that as a part of development management any interest that the structures may hold in contributing to the significance of the designated heritage assets will be properly considered at the appropriate time.

It has been suggested that a Conservation Management Plan should be prepared, and whilst Historic England have no published guidance documents regarding the preparation of this document, it does note that:

‘Conservation management plans don't need to be lengthy documents, but large and complex historic parks and gardens may require a range of research and survey information. The best plans are structured to meet the needs of the specific property and designed to be used for everyday reference by staff managing the site.’

It is clear from the work and reports already carried out that the importance of informed decisions and careful, planned, management of the estate is understood. It will be appreciated that the level of investment that is required to bring the buildings on the site back into use and to sustain the significance of the landscape setting is considerable. Some level of certainty of the principle of the use is necessary before embarking on the next stages of the project.

Clearly Historic England agrees with the principle of the proposed change of use, as confirmed in their written response. In this context and at this stage it is not helpful to make demands for a conservation management plan, which, in any event, cannot reasonably be demanded through the planning system by the local planning authority. As outlined above, it is recognised that a management plan is a useful tool to help long term maintenance and management of the site, and much of the work which would form the basis of this has already been undertaken.

It is acknowledged that further work has yet to be done, and should the opportunity arise, the owner looks forward to working collaboratively with key stakeholders to help deliver the vision for this country estate.