

TOWN & COUNTRY PLANNING ACT 1990

**REDEVELOPMENT OF THE KENNELS AND RELATED BUILDINGS
AT CHITTOE, NEAR BROMHAM, SN15 2PS TO CREATE A SELF-CONTAINED
RESIDENTIAL UNIT WITH ADDITIONAL GUEST ACCOMMODATION AND
RELATED FACILITIES**

**PLANNING STATEMENT &
HERITAGE IMPACT ASSESSMENT**

Prepared by

**Simon Chambers, BSc (Hons) MA MRTPI
Director
LPC (Trull) Ltd**

Our Reference: SWLC.LPC395

July 2026

LPC (TRULL) LTD
TRULL, TETBURY
GLOS, GL8 8SQ
Tel: 01285 841433
www.lpctrull.com

CONTENTS

ITEM	TITLE	PAGE
1.0	Introduction	3
2.0	Planning Background	4
3.0	Proposed Development	5
4.0	Planning Policy Context	8
5.0	Planning Assessment	10
6.0	Heritage Impact Assessment	20
7.0	Conclusions	27

1.0 INTRODUCTION

- 1.1 LPC (Trull) Ltd have been instructed by Spye Park Estate to present their planning application to redevelop the former Avon Valley Hunt Kennels site, Chittoe, Near Bromham, SN15 2PS.
- 1.2 As the aerial photograph extract shows below the site in question is located at the end of Chittoe Heath and to all intents and purposes lies within the obvious limits of the wider Spye Park estate. This relationship will be reviewed under the heritage assessment provided later, as part of this overarching Planning Statement.



- 1.3 The application premises have recently been acquired by the estate, which relates to the cessation of its use in connection with the hunt.
- 1.4 The area to be redeveloped includes a staff flat, kennels, and stable. The application proposal is described in detail within the project architect's (Michaelis Boyd) Design and Access Statement. It is not proposed therefore to repeat the description of the scope of works proposed. The fundamental aim is to enhance the retained core buildings reflecting the wider design theme and high attention to detail evident throughout the estate, expanding

the self-contained residential use of the main building, The Kennels, and adding additional guest bedrooms in The Stables through its sensitive rebuilding, together with associated facilities in the separate Puppy Kennels building. The proposal creates a single planning unit, intended to be used entirely in association with the estate, and its overall operations. A small extension is added to the main building.

- 1.5 It is the purpose of this overarching planning statement to review the extent of the changes proposed, both physically and in terms of the new chapter of use indicated. Both national and local planning policy will be reviewed to demonstrate the acceptable consequence of the proposed redevelopment.

2.0 PLANNING BACKGROUND

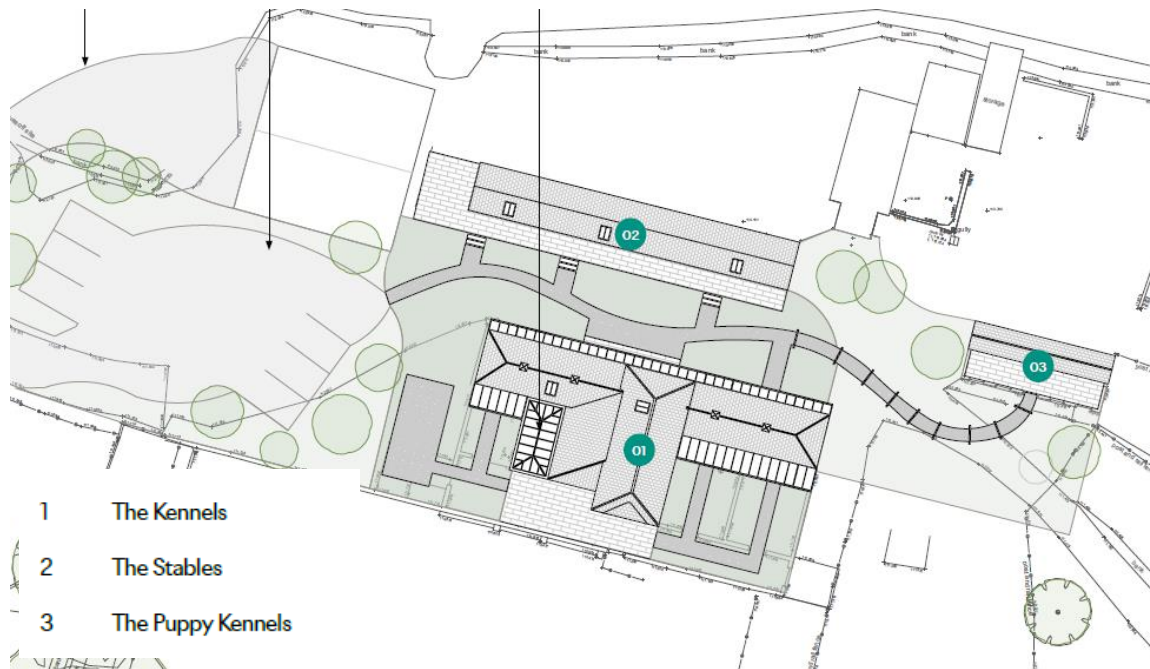
- 2.1 The Avon Valley Hunt previously used the site as kennels for their hounds with staff accommodation, and despite hoping to continue the Hunt and rely on 'fallen stock', the Hunt more recently looked to reduce the hounds and use 'Blood Hounds' for Drag Hunting. The premises though are now vacant following the sale by the Hunt.
- 2.2 To all intents and purposes the premises have therefore reverted back to the estate. Indeed, the current owners have adapted the former closely associated main stable buildings as their main house and associated facilities, taking the name of Spye Park House. Planning permission was granted by application K/42421 to erect a new main house, but despite works having commenced, and thus remaining extant, it is understood to be considered to be overly grand for the day to day needs of the owners.
- 2.3 Historically, this part of Wiltshire was hunted by the Beaufort Hunt. However, in the 1880's a stretch in the centre of country was 'lent' to John Spicer of Spye Park who had his own pack of houses kennelled at Spye Parks, in close proximity to the stables.
- 2.4 In 1912 the Duke of Beaufort gave up the 'country' and Lieut-Colonel J. S. H Fullerton became the first master of the newly formed Avon Vale Hunt. New stables were built and believed to possibly be located at Semington.
- 2.5 In 1941 the hunt re-connected with Spye Park when the kennels were reinstated there, and Captain F Spicer became the master.

- 2.6 There has been no planning history approved recently regarding the premises. The last approved was in 1983 relating to four loose boxes (retrospective) by application K/83/0702.
- 2.7 The existing site is shown in full at section 2.0 of the Architect's Design Statement and it is evident how the yard as a whole has functioned as one, with separate space defined for the hounds and horses and a large expanse of hardstanding and general purpose buildings.
- 2.8 The Planning Practice Guide (PPG), which accompanies the National Planning Policy Framework (NPPF), was amended in February 2024 at Paragraph: 039 Reference ID: 18a-039-20190723 to remind local authorities that the identification of Non-designated Heritage Asset (NDHA) is a rarity rather than a common occurrence and, if a building is highlighted as such, it should have sufficient justification and plausibility. In other words, just because a building is old, or holds a record on a local Historic Environment Record (HER), it does not mean it should automatically be treated as an NDHA. In fact, the PPG states that "a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets." It is therefore essential that a list of heritage assets of local importance is not de-valued by the inclusion of those which do not meet the criteria.
- 2.9 The planning background confirms the Hunt as a whole has had historic associations locally, however, the architecture is of a much later period than that around Spye Park House and is not of sufficient heritage significance so as to warrant its consideration as a NDHA.

3.0 PROPOSED DEVELOPMENT

- 3.1 This current full planning application seeks planning permission to change the use and adapt/convert/rebuild parts of The Kennels, The Puppy Kennels, and The Stables to provide private guest accommodation. A comprehensive scheme of hard and soft landscaping is also proposed to enhance the appearance of the site, in particular by replacing existing areas of hardstanding and concrete yards with soft landscaping.

3.2 The Design and Access Statement provides a full description of each application building including their proposed uses. An extract is shown below which identifies the application buildings:



3.3 The Kennels will be renovated to provide guest accommodation (expanding on the existing self-contained unit of accommodation at first floor), The Stables will be re-build to provide ancillary guest accommodation rooms, and The Puppy Kennels will be converted to provide ancillary wellness facilities. The buildings will accommodate up to seven Guest Suites in total which will all be able to utilise the kitchen, dining and living facilities within main Kennels Building.

3.4 The application is supported by the following documents and drawings:

- Document: Design & Access Statement (June 2026) by Michaelis Boyd Associates
- Document: Arboricultural Survey to BS5837:2012 (09 April 2026) by Arbtech Consulting Ltd
- Document: Arboricultural Method Statement (13 May 2026) by Arbtech Consulting Ltd
 - Drawing Ref. AIA01. Title. Arboricultural Impact Assessment
 - Drawing Ref. TPP01. Title. Tree Protection Plan

- Document: Preliminary Ecological Appraisal & Preliminary Roost Assessment (10/03/2026) by Arbtech Consulting Ltd
- Document: Bat Emergence and Re-Entry Survey (23/06/2026) by Arbtech Consulting Ltd
- Document: Biodiversity Net Gain Assessment (23/04/2026) by Arbtech Consulting Ltd
 - The Statutory BNG Metric
- Document: Great Crested Newt eDNA Sampling (20/04/2026) by Arbtech Consulting Ltd
 - Document: Great Crested Newt District Level Licensing Impact Assessment & Conservation Payment Certificate
- Drawing No.26009-001 Title. Existing Site Location Plan
- Drawing No.26009-002 Title. Existing Site Plan
- Drawing No.26009-003 Title. Existing Ground Floor Plan
- Drawing No.26009-004 Title. Existing First Floor Plan
- Drawing No.26009-005 Title. Existing Roof Plan
- Drawing No.26009-010 Title. Existing Ground Floor Proposed Demolition Plan
- Drawing No.26009-011 Title. Existing First Floor Proposed Demolition Plan
- Drawing No.26009-030 Title. Existing Elevations - Kennels
- Drawing No.26009-031 Title. Existing Elevations - Stables and Puppy Kennels
- Drawing No.26009-040 Title. Existing Elevations Proposed Demolition - Kennels
- Drawing No.26009-041 Title. Existing Site Location Plan Existing Elevations Proposed Demolition - Stables and Puppy Kennels
- Drawing No.26009-100 Title. Proposed Site Plan
- Drawing No.26009-101 Title. Proposed Ground Floor Plan
- Drawing No.26009-102 Title. Proposed First Floor Plan
- Drawing No.26009-103 Title. Proposed Roof Plan
- Drawing No.26009-130 Title. Proposed Elevations - Kennels
- Drawing No.26009-131 Title. Proposed Elevations - Stables and Puppy Kennels

4.0 POLICY AND LEGISLATION

National Planning Policy

4.1 The National Planning Policy Framework (NPPF), and associated Planning Practice Guidance (PPG), sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is a material consideration in planning decisions. The policies within the following chapters of the NPPF are relevant to the assessment of the proposed development: -

- Chapter 2 – Achieving Sustainable Development
- Chapter 4 – Decision-making
- Chapter 5 – Delivering a Sufficient Supply of Homes
- Chapter 9 – Promoting Sustainable Transport
- Chapter 11 – Making Efficient Use of Land
- Chapter 12 – Achieving Well-designed Places
- Chapter 15 – Conserving and Enhancing the Natural Environment
- Chapter 16 – Conserving and Enhancing the Historic Environment

4.2 The NPPF highlights that planning law (section 70 [2] of the Town and Country Planning Act 1990 and section 38 [6] of the Planning and Compulsory Purchase Act 2004) requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise.

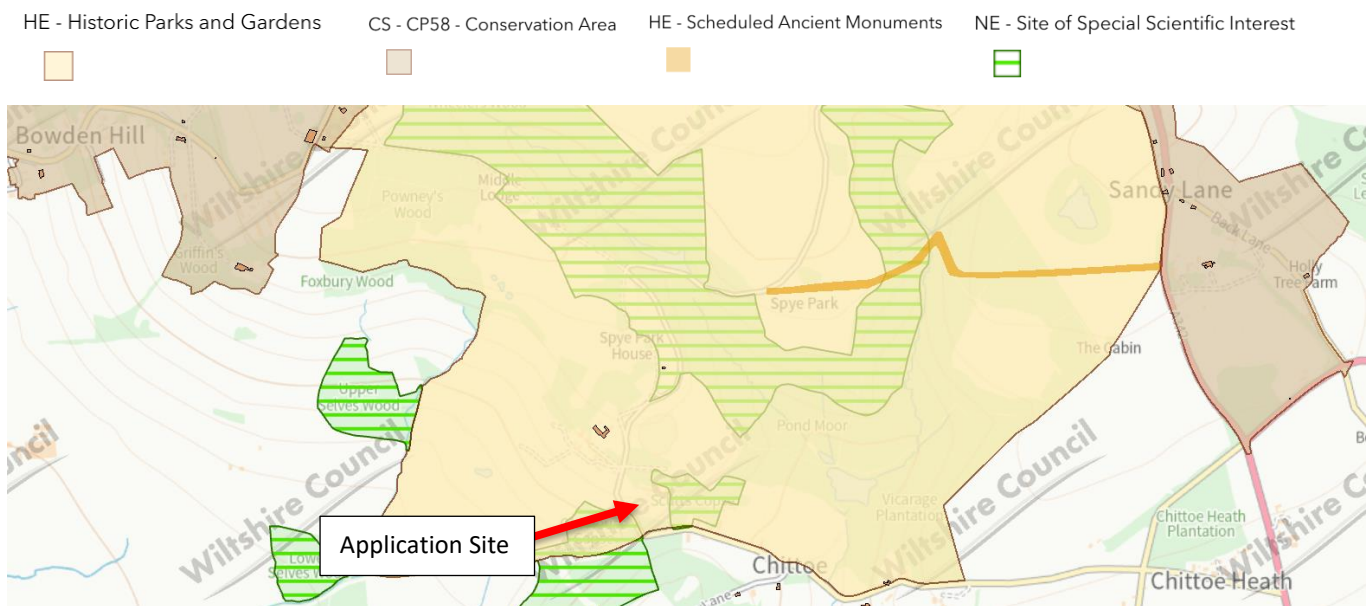
Local Planning Policy

4.3 The development plan relevant to the application is the Wiltshire Core Strategy (WCS) (adopted January 2015) (which includes saved policies from the former Kennet Local Plan). The key policies relevant to the assessment of the proposed development are considered to be:-

- **WCS** Core Policy 1: Settlement Strategy
- **WCS** Core Policy 2: Delivery Strategy
- **WCS** Core Policy 12: Spatial Strategy for Devizes Community Area
- **WCS** Core Policy 44: Meeting Wiltshire's Housing Needs

- **WCS** Core Policy 48: Supporting Rural Life
- **WCS** Core Policy 50: Biodiversity and Geodiversity
- **WCS** Core Policy 51: Landscape
- **WCS** Core Policy 57: Ensuring High Quality Design
- **WCS** Core Policy 58: Conservation of the Historic Environment
- **WCS** Core Policy 60: Sustainable Transport
- **WCS** Core Policy 61: Transport and Development

4.4 The adopted Local Plan is accompanied by the Policies Maps, which provides a spatial representation of the Local Plan policies. The site lies within Flood Zone 1 and is not subject to any national or local landscape designations. The site does however form part of the Spye Park Historic Park and Garden. The site also lies within close proximity to the Spye Park Site of Special Scientific Interest (SSSI)



Local Plan Policies Map – WCS

4.5 The site falls within a designated Neighbourhood Plan Area, however a Neighbourhood Plan has yet to be 'made'. The Bromham Neighbourhood Plan is currently within the final preparation stages and there has been some initial informal community consultation.

4.6 The following Supplementary Planning Documents and are also relevant in the determination of this application:

- Wiltshire Local Transport Plan 2011 – 2026: Car Park Strategy
- Wiltshire Council Design Guide (2024)

Emerging Planning Policy

4.7 The WCS was adopted in 2015 and has therefore been under review, resulting in the production of the draft Wiltshire Local Plan (WLP) which was submitted to the Secretary of State for Housing Communities and Local Government for independent examination on 28 November 2024. There were no fundamental changes proposed to the Spatial Strategy of the Local Plan, as presented within Pre-Submission Draft (2020 – 2038) (Regulation 19) Wiltshire Local Plan (September 2023). However, on the 17 November 2025 the WLP Inspectors postponed the hearing sessions scheduled for December 2025 due to a number of concerns in relation to the “Sustainability Appraisal, Habitats Regulations Assessment, housing need and the housing requirement, and employment land, together with the plan period”.

4.8 The Council suggested a further programme of work to address the concerns raised, however, the Planning Inspectorate wrote to the Council on the 27 February 2026 advising that the Council should either (i) withdraw the Local Plan from examination or (ii) request that the Inspectors draft a final report (which would recommend non-adoption). The Council subsequently withdrew the draft WLP from the Examination process.

4.9 The Town and Country Planning (Local Planning) (England) Regulations 2026 introduced the new Local Plan system which came into effect in March 2026. The 30-month prescribed timescale for plan preparation must commence by 31 October 2026. The Council will not therefore have an up-to-date strategy or Local Plan for years to come.

5.0 KEY ISSUES AND PLANNING ASSESSMENT

5.1 In light of the context of the site and relevant national and local planning policies the key material planning considerations are considered to be:-

- i) Principle of Development

- ii) Impact on the Natural & Historic Environment
- iii) Impact on Highway & Pedestrian Safety
- iv) Impact on Ecology and Biodiversity

Principle of Development

- 5.2 The WCS includes a Spatial Strategy which sets the foundations for how ‘sustainable development’ is defined and applied within Wiltshire. It has three key elements; a Settlement Strategy, Delivery Strategy and Infrastructure Requirements. The settlement and delivery strategies define where development will be the most sustainable across Wiltshire’s settlements.
- 5.3 Core Policy 1 ‘Settlement Strategy’ and Core Policy 2 ‘Delivery Strategy’ of the WCS outline that there is a presumption in favour of sustainable development within the Principal Settlements, Market Towns, Local Service Centres and Large Villages and development should be restricted to within the Limits of Development other than in exceptional circumstances, as set out within the relevant core policies contained within the plan, i.e. the ‘exception policies’.
- 5.4 The WCS ‘exception policies’ that permit new development within the countryside, in line with the delivery strategy outlined in Core Policy 2, are listed within paragraph 4.25 and includes Core Policy 48 ‘Supporting Rural Life’ and Core Policy 39 ‘Tourist Development’. These policies are key when considering the principle of the development and are considered further below. However, it should be highlighted from the outset that there is an established and unrestricted residential unit within The Kennels and this application merely seeks to expand the existing amount of residential floorspace and clearly define a residential curtilage for the unit. It is not an unusual proposition for any country estate that typically have ancillary buildings for a range of purposes, including staff and guest accommodation. The proposed self-contained planning unit will be for private purposes ancillary to the Spye Park Estate but the following assessment of the scheme against the aforementioned exception policies demonstrates the support of Local Plan towards the provision of new residential or short stay units within the countryside.

Core Policy 48 'Supporting Rural Life'

- 5.5 Core Policy 48 of the WCS permits the conversion and re-use of rural buildings for employment, tourism, cultural and community uses, including an unrestricted residential use if it can be demonstrated that the aforementioned uses are not practical propositions. The policy is now out-of-date because since the adoption of the WCS there has been a material change in national planning policy around the conversion of rural buildings. There are now permitted development rights that allow the conversion of rural buildings to dwellings too, and this was reflected within the draft Wiltshire Local Plan (WLP) with the relevant draft policy providing support for the conversion of rural buildings to dwellings.
- 5.6 The proposed development involves the re-use and renovation of The Kennels and The Puppy Kennels as opposed to their 'conversion'. The buildings will largely retain their existing external materials of red brick walls and clay tile roofs along with external openings as explained within the Design and Access Statement. The Kennels building has been partly used for residential accommodation in association with the dog kennels use. The development as a whole will create a single use planning unit, intended to be used entirely in association with the Spye Park Estate as mentioned above. The principle of the proposed residential use of the buildings for guest accommodation, albeit it that it is self-contained, is considered to align with Core Policy 48 of the Local Plan and is not considered to be contentious.
- 5.7 The proposed development must however comply with criterion 'i' to 'v' of the policy as shown within the relevant extract from Core Policy 48 below:-

Conversion and re-use of rural buildings

Proposals to convert and re-use rural buildings for employment, tourism, cultural and community uses will be supported where they satisfy the following criteria:

- i. The building(s) is/are structurally sound and capable of conversion without major rebuilding, and with only necessary extension or modification which preserves the character of the original building.
- ii. The use would not detract from the character or appearance of the landscape or settlement and would not be detrimental to the amenities of residential areas.

iii. The building can be served by adequate access and infrastructure.

iv. The site has reasonable access to local services.

v. The conversion or re-use of a heritage asset would lead to its viable long term safeguarding.

Where there is clear evidence that the above uses are not practical propositions, residential development may be appropriate where it meets the above criteria. In isolated locations, the re-use of redundant or disused buildings for residential purposes may be permitted where justified by special circumstances, in line with national policy.

- 5.8 The Kennels and Puppy Kennels are masonry buildings which are in a good state or repair. No structural work is required to secure their re-use. There will be minor alterations and the addition of a conservatory, but the overall character and appearance of the buildings will be retained (criteria i of Core Policy 48).
- 5.9 The application site lies within the Grade II Registered Park and Garden of Spye Park, however the scheme is designed to enhance the appearance of the site itself, and there would be no discernible impact on the wider landscape character as a result of the development and there would be no impact, as a result of overlooking etc, on the amenities of the occupiers of neighbouring residents (criteria ii), the closest being Egypt Lodge and Francome House within the rounds of the Estate. The site has good existing access arrangements and already benefits from access to mains electricity, water and sewer infrastructure (criteria iii). The site has reasonable access to local services (criteria iv) being close to the Large Village of Bromham and the higher tier settlement of Devizes and Chippenham.
- 5.10 The Kennels and Puppy Kennels are not designated heritage assets as mentioned above, however the adaption and re-use of the buildings will secure their long term future and will contribute positively towards the significance of Spye Park by improving the overall appearance of the site as discussed within the Heritage Impact Assessment below.

Core Policy 39 'Tourist Development'

- 5.11 The WCS explains that Wiltshire has a wealth of natural and heritage assets and tourism is important to its economy. Core Policy 39 'Tourist Development' therefore provides broad support for new tourist development and seeks to direct new facilities to within the built-up area of settlements in line with the aforementioned Spatial Strategy of the Local Plan. However, it recognises that the countryside plays an important role to the tourist industry and therefore provides scope for new facilities within the countryside. The relevant extract from the policy is as follows:

In exceptional cases development may be supported away from the Principal Settlements, Market Towns, Local Service Centres and Large and Small Villages where it can be demonstrated that all of the following criteria are met:

- i. There is evidence that the facilities are in conjunction with a particular countryside attraction.
- ii. No suitable alternative existing buildings or sites exist which are available for re-use.
- iii. The scale, design and use of the proposal is compatible with its wider landscape setting and would not detract from the character or appearance of the landscape or settlement and would not be detrimental to the amenities of residential areas.
- iv. The building is served by adequate access and infrastructure.
- v. The site has reasonable access to local services and a local employment base.

- 5.12 The proposed development involves the re-building of The Stables as part of the comprehensive re-use and redevelopment of the site. The building is not easily suitable for conversion and has no architectural merit therefore the proposal to re-build the structure is not considered to be contentious and indeed if retained as an incidental residential outbuilding once the overall residential use is in place and within the scope of the Uttlesford case could be used as ancillary accommodation within the same planning unit. The proposed use of the new building is for private guest accommodation as part of the Spye Park Estate rather than open unrestricted tourist accommodation,

however in the absence of a policy which directly applies to the proposal, the criteria of Core Policy 39 is considered to be relevant., and there is no physical impact resulting from the simple sustainable reconstruction, retaining evidence of the historic usage.

5.13 The proposed ancillary building for guest accommodation is required as part of the masterplan for the site to provide private guest accommodation linked to the Spye Park Estate (criteria i). The existing masonry buildings at the site will be adapted and re-used and there are no other suitable buildings to accommodate the additional guest accommodation (criteria ii). Furthermore, as noted above, the proposed rebuilding of The Stables will contribute towards the enhancement of the site, have no adverse impact on landscape character, and the site is served by suitable access and infrastructure (criteria iii – v.).

5.14 While the proposed development is for private guest accommodation it is material to note that there is policy support for general tourist accommodation. The draft Wiltshire Local Plan was underpinned by up-to-date evidence in relation to the tourist sector within Wiltshire and identified the significant need for new tourist accommodation within Wiltshire. The draft Plan stated that:-

“5.31 Luxury, boutique and high-quality hotel and visitor accommodation businesses perform strongly in Wiltshire and represent an opportunity to attract lucrative markets. There is scope for additional supply at the higher end of the offer through the upgrading and repositioning of existing stock and the opening of new establishments. However, to support projected growth in the sector, visitor accommodation studies for the county identify a lack in many types of different accommodation. Opportunities for growth include: budget accommodation; holiday parks and eco lodges; boutique hotels in market towns; glamping, camping and caravan sites; pub and farm stay accommodation; activity holidays and residential centres.

5.32 If the county is to compete successfully and attract market segments that risk going elsewhere, it needs more of the above types of accommodation in rural settings. *There is also a need to recognise that rural hotels and tourism businesses may benefit from permanent accommodation to aid the retention and attraction of staff and facilitate year-round operation.” (emphasis added).*

Principle of Development Summary

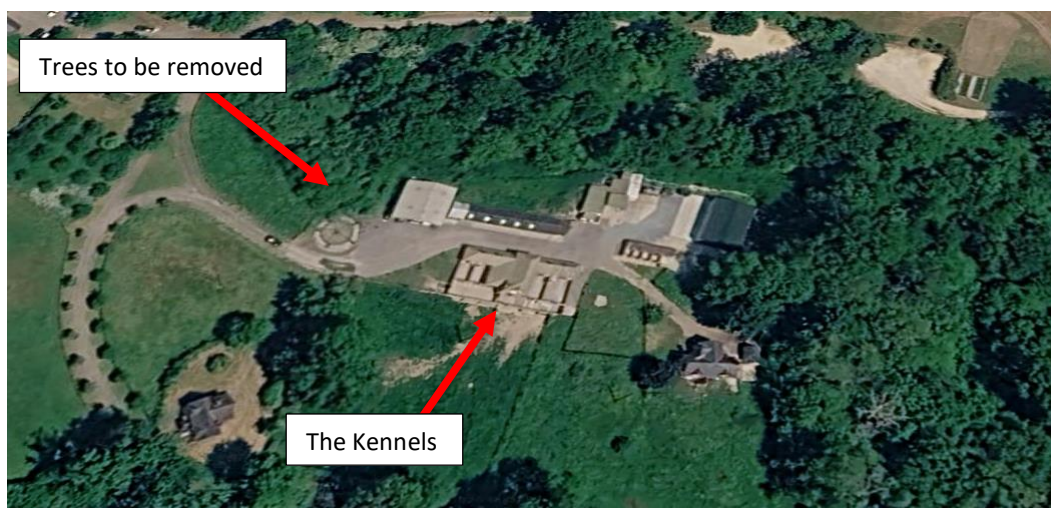
- 5.15 In light of the above policies, the principle of the proposed development is not considered contentious and aligns with the spatial strategy and associated exception policies of the Local Plan. The refurbishment, re-use, and rebuilding of the application buildings are all interconnected to ensure the comprehensive redevelopment of the application site. The scheme will create a single residential planning unit which will be used entirely in association with the Spye Park Estate. The development will enhance the appearance of the site and have no wider impact on the Spye Park Registered Park and Garden. It is however recognised that all relevant site specific impacts need to be considered and addressed to ensure no adverse impact on the local environment, as discussed within the following sections.

Impact on the Natural & Historic Environment

Natural Environment

- 5.16 The NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscape and recognising the intrinsic character and beauty of the countryside (paragraph 187). These objectives are reinforced within Core Policy 51 of the WCS which seeks to ensure new developments do 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.
- 5.17 The application site does not lie within a protected landscape (albeit falls within a Registered Park and Garden as discussed below), however the Local Plan policy requires proposals to be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) (LCA). The application site lies within the Bowood Greensand Hills LCA (Type 7) of the Wiltshire Landscape Character Assessment (2005). The site is however previously developed land and does not contribute towards the key characteristics of the landscape as detailed within the LCA report.

- 5.18 The aerial photograph below shows the application building and the surrounding areas of hardstanding and larger modern steel framed metal clad buildings. The site is well contained and proposed development will have no impact on wider landscape character therefore there would be no conflict with Core Policy 51 of the WCS.



Aerial Photograph – June 2023 (Source: Google Earth Pro)

- 5.19 The Arboricultural Method Statement (13 May 2026) by Arbtech Consulting Ltd explains that one partial group of trees will require removal as part of the proposed scheme to allow direct access to other buildings, however the loss will be mitigated for by planting new trees. Overall, the development will enhance the appearance of the current buildings and will deliver a comprehensive soft landscaping scheme to help soften the development and ensure the development integrates well with the existing built and natural environment.

Historic Environment

- 5.20 The proposed development is designed to enhance the historic environment as outlined within the Heritage Impact Assessment within Section 6 below.

Impact on Highway & Pedestrian Safety

- 5.21 Core Policy 60 'Sustainable Transport' and Core Policy 61 'Transport and New Development' of the WCS seek to ensure that new development is as

sustainable as possible in terms of its location and design and is capable of being served by safe access to the highway network.

- 5.22 The proposed use is considered to be acceptable in principle as outlined above and will not result in a greater number of vehicular movements over and above the status quo. Indeed, it is contended that there is arguably a reduction against the hunt's stabling and management of the hounds etc. The estate has a number of visitors and guests throughout the year and this proposal simply provides a private facility for visitors to utilise during their visit to the estate and the area generally.
- 5.23 The proposed development would utilise the existing access route via Chittoe Heath Road which serves the site and the application drawings provide details of the designated parking area for the facility. There will be sufficient parking spaces to comply with the Council's Parking Standards. It is considered the proposal will fully comply with Core Policies 60 and 61 of the WCS.

Impact on Ecology and Biodiversity

- 5.24 The NPPF advises that new developments should protect and enhance biodiversity and geodiversity (paragraph 192) and Core 50 'Biodiversity and Geodiversity of the Local Plan outlines 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.
- 5.25 The application site is not covered by any local, national or European nature conservation designations. The site has however been subject to survey work by Arbtech Consulting Ltd and their findings are presented within the

submitted Preliminary Ecological Appraisal & Preliminary Roost Assessment report, Bat Emergence and Re-Entry Survey report, and Great Crested Newt eDNA Sampling report.

- 5.26 The reports consider the potential impact on the Spyre Park SSSI and advises that because the site has already been developed, the proposed development is considered unlikely to affect the function or ecological connectivity of SSSI. The reports however advise that the site is hydrologically active with two drainage ditches located to the north of the site boundary and further ditches and ponds within 500m, which are likely to enhance the local area for amphibians, bats and birds. It is also confirmed that a Natural England District Level Licensing (DLL) scheme will be required to legally permit impacts to great crested newt (GCN) terrestrial habitat within the zone of influence of a confirmed GCN breeding pond. A copy of the required license has been submitted as part of the application.
- 5.27 The wider ecological assessment and bat survey work confirms that the proposed development can proceed without adversely impacting wildlife or protected species, provided mitigation measures are put in place such as precautionary working measures and the timing of work outside the bird nesting season. The reports also recommend further enhancement measures such as the installation of bats boxes or planting of fruit trees. These measures can all be secured via a condition of the planning permission.
- 5.28 In terms of the requirement to secure Biodiversity Net Gain (BNG), Core Policy 50 'Biodiversity' of the WCS outlines that new development should seek opportunities to enhance biodiversity, however it has become mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). The requirement is to deliver 10% BNG.
- 5.29 The application is supported by a BNG analysis via the Defra Small Sites Metric. The associated Biodiversity Net Gain Assessment (23/04/2026) by

Arbtech Consulting Ltd confirms that the proposed development will achieve a 51.62% biodiversity net gain enhancement within the site.

- 5.30 The development will fully comply with the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended) and will therefore have no adverse ecological impacts.

6.0 HERITAGE IMPACT ASSESSMENT

National Heritage Policy

- 6.1 Chapter 16 of NPPF includes policies on conservation of the historic environment with the main underlying policy 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. It outlines that applications for development should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance (paragraph 207).
- 6.2 The NPPF clarifies that a 'Designated Heritage Asset' includes a World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.
- 6.3 The NPPF advises that for heritage policy, 'significance' means "the value of a heritage asset to this and future generations because of its heritage interest. The interest may be **archaeological**, **architectural**, **artistic** or **historic**. Significance derives not only from a heritage asset's physical presence, but also from its setting" (emphasis added).

Heritage Assets & Impact of Proposed Development

- 6.4 The application buildings are not designated heritage assets and are not considered to be NDHAs as mentioned above, however the site does fall

built a long single house of two low stories on the precipice of an incomparable prospect, and landing on a bowling green in the park. The house is like a long barn, and has not a window on the prospect side'. In the early C18 Stephen Switzer (1682-1745) worked at Spye, recording his work on an Italian cascade made 'sometime since' as 'equal to any in the French Gardens, the Falls of the Water being over Steps and rough Work of different Kinds and different Heights, of about 30 or 40 Foot Fall' (Switzer 1734). Switzer also formed a canal which fed little square basins for fish (Loudon 1822), and he commented on the number of springs and the good water quality, from the sandy soil (Switzer 1734).

Between 1762 and 1800 Spye was owned by Sir Edward Bayntun Rolt, who preserved the ancient trees in the park and remodelled the house, possibly employing the architect Edward Stephens (Trafford-Roberts 2001). Robertson (1792) referred to the 'Forest Scenery' in the park due to the number of ancient trees and to 'an ancient building, but the front next to the park has been modernised, and is ornamented by a handsome portico'. Within ten years many of the trees had been removed and the park was described by Warner (1801) as being as bare as Salisbury Plain. This was probably the work of Sir Andrew Bayntun Rolt, who inherited in 1800. William Emes (1730-1803) may have been employed to carry out alterations to the park in the late C18 (Trafford-Roberts 2001).

In the mid C19 a Dr Starkey purchased the estate at Spye from the Bayntun family. Starkey made minor changes to the house and sold the estate to J W Spicer in 1864. Spicer demolished the C17 house in 1868 and employed the architect William Burn (1789-1870) to build a new one, set slightly behind the old house, on higher ground but utilising the same views to the south-west. An article in the Gardeners' Chronicle (1891) refers to ancient trees in the park and trees on the lawn which were several hundred years old. A new shrubbery was planted on the steeply sloping ground near the site of the old house and an extensive walled garden was built near Chittoe in 1876 (Trafford-Roberts 2001). Since the late C19 there have been some minor additions to the pleasure grounds but few alterations have been made in the park. In the 1990s the C19 house was demolished as a result of fire damage and the former stables were subsequently converted into the main residence. Spye Park remains (2002) in private ownership.

DESCRIPTION

LOCATION, AREA, BOUNDARIES, LANDFORM, SETTING Spye Park, c 315ha (as here registered), is located c 6km south-east of Chippenham in the county of Wiltshire. The park is set in an area of farmland and other designed landscapes, with Bowden Park immediately to the north-west, Bowood (qv) c 2km to the north-east, and Lacock Abbey (qv) c 3km to the north-west. The park is bounded by the Lacock road and the village of Bowden Hill to the north-west, the Lacock road along the north side, by open farmland to the south-west and south-east, by Devizes Road and the village of Sandy Lane to the north-east, and by Clink Lane and the village of Chittoe to the south. The centre of the park occupies a high position looking out

over the Avon Vale, with the ground falling steeply to the south-west. A small valley crosses the park from the north-west to the south-east. There are good views from the house site, the gardens, and from the higher ground in the park, to the south-west. The boundaries are marked by a mixture of fences and walls.

ENTRANCES AND APPROACHES Three drives lead through the park to the site of the house, one from the north-west, one from the north-east, and the third from the south. The main drive is from the Lacock road and enters the north-west edge of the park through an early C16 Tudor gatehouse, Spye Arch (listed grade II*), which is situated c 1km north-west of the site of the house. It is built of ashlar with a stone slate roof and is of two storeys with a battlemented parapet. There are C18 gothick ogee-headed niches to either side of the arch, and an oriel window on the first floor. The apron panels bear the arms of Henry VIII. The gatehouse was built for Bromham House and was moved to Spye Park in the late C18, when it was remodelled slightly.

A drive leads through the arch and then runs east for 200m, lined by an avenue of late C18 or early C19 limes and horse chestnuts, with additional mature sycamore. A side drive from the north-west joins the main drive at the end of the avenue, giving access to Spye Arch House and some estate cottages. The drive then curves for 300m through Powney's Wood, where it is lined by mature laurels, to the C19 red-brick Middle Lodge. The drive then enters the western park and runs south-east for c 400m, flanked by ancient oak trees to the south, and then divides into three. The southern drive leads south for c 200m to the turning circle in front of the platform and surviving portico of the former house. The middle drive leads first south-east, then south-west to Spye Park House (the former stables), the Dairy Farm, and finally south (c 900m in total) to a lodge (c 450m south of the former house site) **and the kennels at the Chittoe entrance**. The northernmost of the three branches of the drive leads east for c 400m, alongside the upper pond, and then curves north-east across the northern park for c 800m to White Lodge (c 1.1km north-east of the former house site, now a stables and equestrian centre) on the Lacock road.

PRINCIPAL BUILDING Spye Park was built in 1863-8 by William Burn for J W G Spicer. It was demolished in the 1990s after a fire. All that remains of the house is the entrance porch and the house platform, from which there are excellent views to the south-west. Pevsner (Cherry and Pevsner 1975) described the house as 'symmetrical gabled Tudor'. It had a low extension on the north-west end of the garden front and a circular tower to the right which were both added in 1871.

Spye Park House (listed grade II) stands c 250m to the south-south-west of the site of Spye Park. It was the former stables and coach house to Spye Park and is now the main residence. The original range, in ashlar with a stone slate roof, was built in the mid C17 for the Bayntun family. There are C19 additions including a stable range, probably built for J W G Spicer after 1864.

GARDENS AND PLEASURE GROUNDS *The site of the former house lies between two large lawns. That to the north-east is largely open, giving views to the north and north-east over the valley of a stream, framed by scattered C18 oaks. Towards the southern end of this lawn, c 100m east of the former house site, is the Game Larder (listed grade II), built c 1870 in red brick with ashlar dressings. It has a steep, octagonal roof with bellcast eaves and an octagonal lantern, and a projecting gabled porch on the west side.*

To the south-west of the house site is an extensive lawn lined by trees within the pleasure grounds, which frame the views. The trees include C18 oaks, ash, and horse chestnuts, supplemented by C19 and C20 ornamentals, and with an understorey of yew, hazel, and holly. At the north-east end of this lawn are the footings of the former house, raised on a platform and faced in stone (and formerly with balustrading which has been relocated to the north-east of Spye Park House). Below the plinth is a long grass terrace, formerly reached by a flight of semicircular steps (now gone) at the north-west end. At the south-east end of the terrace there is a stone loggia or gazebo, with glazed sides and an open front with four pillars. To the north-east of the loggia is a partly walled flower garden, with a service area and garages beyond. Between the flower garden and the south terrace is a raised circular area planted with C18 limes. A narrow canal is situated on the lawn, c 15m to the south-west of the terraces, with a covered seat at the north-west end. The planting in the pleasure grounds to the north-west of the lawn includes C19 pines, cypresses, and blue cedar, with some older trees and areas of shrubs. A large, roughly circular feature, possibly an early C20 croquet lawn, lies c 100m to the west-south-west of the house site. It consists of an area of grass surrounded by a slightly raised mound.

The south-west end of the lawn terminates at a steep slope which acts as a ha-ha. It was designed to be open but now has scrubby trees growing on it. It was referred to by Switzer as the 'precipice', and on it have been found remains of water features, possibly those by Switzer (Trafford-Roberts 2001).

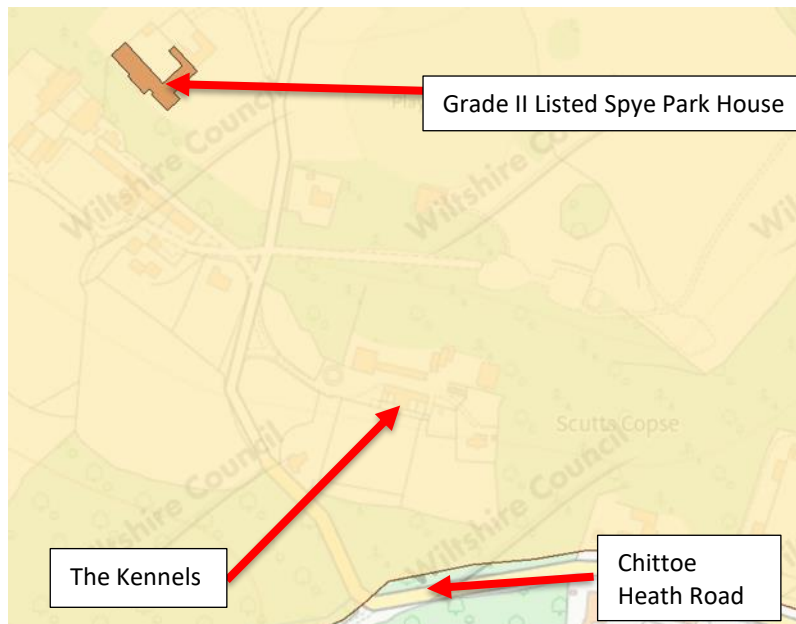
PARK *There are three areas of park, located to the north, west, and east of the site of the former house. The planting largely dates from the late C18, with some ancient oaks. A stream runs from north-west to south-east through the park, dividing the north park from the western and eastern areas. There are two ponds along the course of the stream, the upper pond immediately north of the drive to White Lodge, and the lower pond, c 600m east-south-east of the former house. The ponds, along with several others along the stream, are shown on the OS map of 1886. The northern part of the west park, lying to the south of the main drive, is in pasture but the land running from the west side of the pleasure grounds down to Clink Lane is now partly in arable (2002). In the north park, which is now in arable, there is a clump of C19 Scots pine on the rising ground to the west of the drive. The small eastern park is mainly pasture, with a cricket pitch and pavilion c 200m to the south of the site of the former house.*

There are two large areas of woodland in the park, Powney's Wood to the north-west, and Pond Moor to the south-east, both of which are shown on Andrews and Dury's map of Wiltshire (1773) and the OS map of 1886. These are predominantly oak and ash, with understorey planting of laurel, yew, and holly. Woodland now (2002) extends north from Pond Moor up to White Lodge, occupying an extensive area of former parkland.

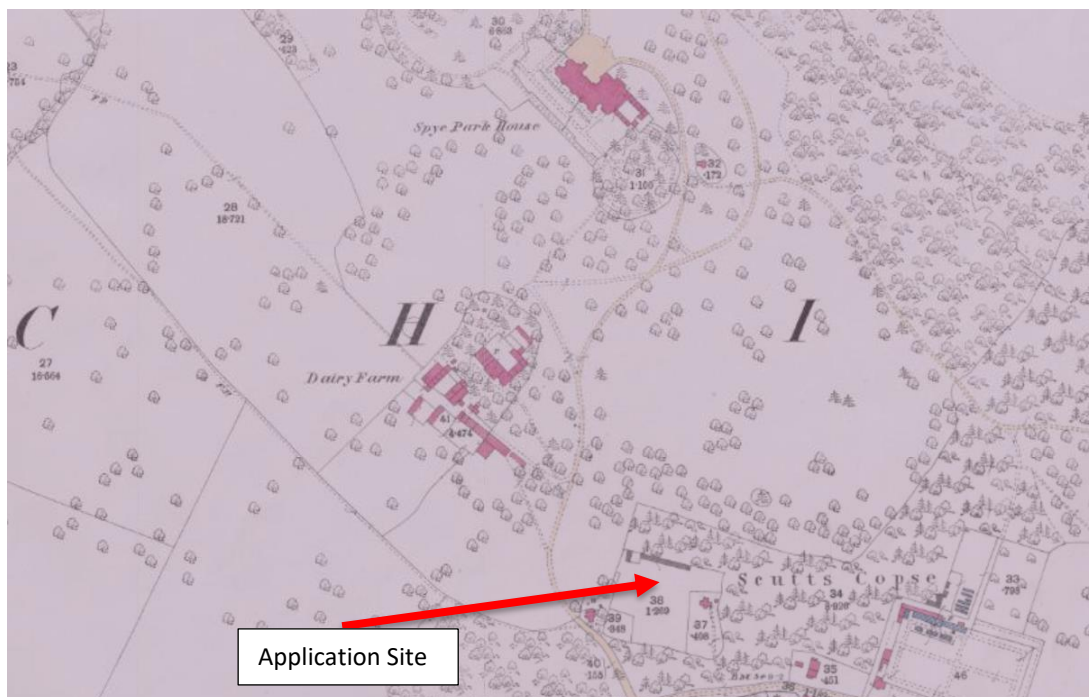
The semicircular eastern tip of the park, beyond the woodland, is now (2002) managed as farmland belonging to Home Farm, which is situated c 150m south of the Lacock road. The area is bounded by a woodland belt around the curving north-east and east side, and has an early C20 irregularly shaped pond with an island, Leech Pond, located just south of the centre and surrounded by woodland.

KITCHEN GARDEN An extensive walled garden is situated c 500m south-east of the former house site. The red-brick walls and the Garden Lodge (for which the walled garden is now a private domestic garden) were built in 1876.

- 6.7 The application site does not contribute towards the special character or 'significance' of the registered Park and Garden. The only reference to the application site within the official list entry is when describing the three routes of access into Spye Park. The application site lies on the southern periphery of the Registered Park and Garden area and is surrounded by Scutts Copse ancient woodland. Due to the landform and woodland the site is physically and visually separate from the areas that contribute towards the significance of the Registered Park and Garden. This is also reflected by the historic separate ownership and management by Avon Valley Hunt.
- 6.8 There are four Listed Buildings within the Registered Park and Garden, as described above, but the current site does not form a part of their setting and there is no intervisibility between the site and the listed buildings. The nearest is the Grade II Listed 'Spye Park House With Stables and Gate Piers' (official listed entry reference 1365600) as shown on the map below, along with the access from Chittoe.



- 6.9 The Kennels is understood to be a late Victorian building, built of Caen brickworks, similar to The Puppy Kennels and The Stables being a much more modern addition. The Stables were built in accordance with planning permission reference K/83/0702 granted in 1983. However, the historic maps shown below does indicate a building of a similar footprint historically stood in its place.



Historic Map 1898 – 1939

6.10 In summary, whilst the application site lies within the boundary of the Grade II Listed Registered Park and Garden of Spye Park, it is physically and visually separate from the areas that contribute towards the special character and significance of the designated heritage assets. The application site has until recently been within the ownership of the Avon Valley Hunt, however it is now within the ownership of the applicant and the wider Estate and this application presents a scheme that will not only enhance the character and appearance of the site but ensure it becomes an integral part of the occupation and operation of the estate. The Registered Park and Garden will be enhanced by the proposed development.

7.0 CONCLUSION

7.1 The application seeks full planning permission to redevelop The Kennels, The Puppy Kennels, and The Stables at the former Avon Valley Hunt Kennels site at Spye Park, Lacock, Chippenham, Wiltshire, SN15 2PR to provide private guest accommodation for the Estate.

7.2 The current buildings accommodate a range of uses which comprises a registered flat, former kennels and stables. The intention is to adapt, convert and re-build the buildings to create a single planning unit intended to be used entirely in association with the estate, and its overall operations.

7.3 The site lies within the Grade II Registered Park and Garden of Spye Park but it does not contribute towards the significance of the designated heritage asset. The Kennels is a late Victorian building which will be renovated to provide a self-contained unit of guest accommodation, with the modern Stables being rebuilt to provide ancillary guest rooms, and The Puppy Kennels providing associated health and wellbeing facilities. The proposed development will enhance the overall appearance of the site and will deliver landscaping and ecological enhancements.

7.4 The proposed development would deliver social, economic, and environmental benefits and is therefore considered to result in a sustainable form of development which aligns with the objectives and policies of the Local

Plan. It is therefore respectfully requested that full planning permission be granted.