

Coles Farm, Alcombe, Corsham, SN13 8QL

Planning Statement

Webster Hart

August 2026

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Planning Statement

Client: Webster Hart

Date: August 2026

Prepared for

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Appendix 1: ENQ/2025/01728 Pre Application Response

1 INTRODUCTION

- 1.1 This Planning Statement has been prepared by Morgan Elliot Planning on behalf of our client Webster Hart (the Applicant) to accompany an application for Householder Planning Permission and Listed Building Consent for the reinstatement of a swimming pool, the internal and external works to two residential outbuildings and the replacement of an oil tank at Coles Farm, Alcombe, Corsham, SN13 8QL.
- 1.2 Coles Farmhouse, the host dwelling, is a Grade II* listed farmhouse of the mid-17th century with later 17th-century additions. Constructed of local rubble stone under a stone-tiled roof with coped gables dated 1646 and 1685, the building is substantial and is of high architectural and historic interest. The outbuildings in question and the proposed swimming pool sit within the residential curtilage of Coles Farmhouse.
- 1.3 The subject application benefits from pre-application advice provided by Wiltshire Council (ENQ/2025/01728), with officers indicating support in principle for the proposed internal and external alterations to the reinstatement of the swimming pool and the internal and external works to a residential outbuilding, subject to further detail and justification which has been provided in this Planning Statement.
- 1.4 This Planning Statement provides a contextual analysis of the site and the surrounding area, together with details of the planning history in **Section 2**. **Section 3** provides an overview of the pre-application response, whilst **Section 4** details the proposal. **Section 5** appraises the relevant policies contained within the development plan for the area, as well as other material considerations relevant to the development proposed, including the National Planning Policy Framework (NPPF) and the Wiltshire Design Code. **Section 6** assesses the main planning issues and **Section 7** outlines undertakes the necessary planning balance. The conclusions are set out in **Section 8** where it found that planning permission can be granted without delay.
- 1.5 This PS should also be read in conjunction with the following;
- Application form
 - CIL form 1
 - Site location plan
 - Existing and proposed block plan
 - Existing and proposed site plan

- Existing and proposed floor plans
- Existing and proposed elevations
- Existing and proposed roof plans
- Existing and proposed section drawings
- Demolition plans
- Detailed window and door drawings
- Design and Access Statement
- Historic Report
- Preliminary Bat Roost Assessment
- Bat Survey Report
- Great Crested Newts Presence/Absence Survey
- Tree Survey and Tree Constraints Plan

2 SITE AND SURROUNDING AREA

The Site

- 2.1 The application site comprises Coles Farm, located within the hamlet of Alcombe on the western edge of the village of Box, within the administrative area of Wiltshire Council. The site lies in a distinctly rural setting, characterised by open countryside, agricultural land and dispersed residential properties and small rural holdings, reflecting the historic settlement pattern of this part of Wiltshire.
- 2.2 The outbuildings and area for the proposed swimming pool in question lie within the residential curtilage of Coles Farmhouse (List Entry Number: 1022715), a substantial Grade II* listed 7-bed dwelling of significant architectural and historic interest. This is due to its exceptional preservation as a substantial 17th-century vernacular farmhouse. Its architectural importance is demonstrated by high-quality original features like ovolo-moulded windows, hoodmoulds, and multiple stone fireplaces. The building clearly shows its evolution through dated gables (1646 and 1685) and has strong historic interest from its long association with the Webb family from c.1633, offering a complete picture of prosperous domestic life of the period.
- 2.3 The outbuildings sit within the residential curtilage which is characterised by formal garden, pastureland, and mature planting and outbuildings. The majority of the curtilage is enclosed by stone walls and hedgerows.
- 2.4 Outbuilding 01 is located to the southwest of the farmhouse, orientated towards an area of garden land. Outbuilding 02 lies close to the northwest elevation of the farmhouse and is positioned adjacent to the road, forming a distinct but ancillary 2-storey building.
- 2.5 That garden land formerly comprised a swimming pool constructed in the early 1970s which has since been infilled. Figure 1 below shows an aerial view of c.1973 showing the historic site layout, outbuildings 01 and 02 and swimming pool in relation to Coles Farmhouse.
- 2.6 As per the accompanying Statement of Significance, the outbuildings formally comprise a cowshed (Outbuilding 01) and stable building (Outbuilding 02) and in more recent years have been used for ancillary purposes associated with the main dwelling. Overtime a modern garage and store have been attached to these buildings, with a modern glasshouse situated behind the former cowshed (subject of planning permission N/93/01044/FUL).



Figure 1 Aerial view of c.1973 showing the works in progress and the creation of the new swimming pool

Designations

- 2.7 In terms of site designations, as above, Coles Farmhouse is Grade II* listed.
- 2.8 Outbuildings 01 and 02 are considered curtilage listed, as they are located within the setting of Coles Farmhouse.
- 2.9 The site lies within the designated Green Belt and the Cotswolds National Landscape. The site is in Flood Zone 1, an area with a low probability of fluvial, pluvial and surface water flooding. There are no public right of ways (PROW) on site, however, a PROW sits further west of the site (ref. BOX4) and further south of the site (ref. BOX3).

Relevant Planning History

2.10 Having reviewed the Council's online records, the following planning history is of relevance to both the outbuildings, swimming pool, and main farmhouse:

- **PL/2026/00847-** Proposed internal and external works to an existing dwelling. Approved 05/06/2026
- **PL/2026/00535-** Proposed internal and external works to an existing dwelling. Approved 05/06/2026
- **N/11/01914/LBC-** Relocating Boundary Wall. 06/09/2011. Approved with Conditions
- **N/11/01909/FUL-** Relocating Boundary Wall. 06/09/2011. Approved with Conditions
- **N/93/01044/FUL-** Removal of existing greenhouse and erection of new greenhouse on existing foundations replacement greenhouse. 13/07/1993 Approved with Conditions
- **N/90/00073/LBC-** Alterations within the curtilage of a listed building - double garage. 04/05/1990 Approved with Conditions.

3 PRE-APPLICATION RESPONSE

- 3.1 A pre-application enquiry was submitted to the Local Planning Authority on 17th October 2025 and a subsequent pre-application response received on 8th January 2026 (ref:ENQ/2025/01728). A copy of this response is attached at **Appendix 1** to this Planning Statement.
- 3.2 The pre-application response considered the principle of the proposed works that are subject of this application, along with commentary around the site's situation in the Green Belt and the heritage impacts of the proposed development.
- 3.3 Each section below sets out the Council's response to the pre-application enquiry followed by a summary of the Applicant's response to the key points raised.

Principle of development/Green Belt

LPA comment:

- 3.4 The Local Planning Authority confirmed that development within the curtilage of an existing dwelling may be acceptable in principle, subject to compliance with Green Belt policy.
- 3.5 In this regard, the proposed alterations to the outbuildings were not identified as raising significant concerns in principle, provided they remain proportionate and do not materially impact upon the openness of the Green Belt.
- 3.6 Whilst it is acknowledged that there has been a swimming pool on the site, the pre-application response confirmed that the reinstatement of this feature was identified as a key consideration. This response advised that the pool may represent development at the upper end of what could be considered proportionate in the context of the site's planning history. It was therefore recommended that any future application clearly demonstrates that the proposals would not result in a disproportionate form of development, either individually or cumulatively, and that the openness of the Green Belt would be preserved.

Applicant Response:

- 3.7 The principle of the alterations of the outbuildings and re-instatement of the swimming pool is discussed in detail at section 6 below. As outlined, it will be demonstrated that the alterations of the outbuildings to not a disproportionate form development in the Green Belt complying with Paragraph 154 of the NPPF.

- 3.8 With regards to the re-instatement of the swimming pool, the LPA within their pre-application response have unfortunately provided an incorrect assessment in Green Belt terms. Paragraph 154 h) ii) is the relevant test to meet which allows for engineering operations in the Green Belt provided it preserves its openness and does not conflict with any of the purposes within it. The test does not require us to look at disproportionality. Section 6 demonstrates that the proposals do meet Paragraph 154 h) ii) of the NPPF and therefore can be deemed appropriate development in the Green Belt.

Heritage and design considerations

LPA comment

- 3.9 The outbuildings form part of the curtilage of a Grade II* listed building and therefore contribute to its setting and significance. The pre-application response indicated that the proposed alterations to the outbuildings appear broadly sympathetic in principle.
- 3.10 Notwithstanding this, further detailed information will be required to fully assess the impact of the proposals. This should include detailed drawings, material specifications, and a clear explanation of how the works will preserve the character and significance of the heritage asset.
- 3.11 Care should be taken to ensure that any new openings, glazing, and alterations are sensitively designed and appropriately detailed.

Applicant Response

- 3.12 A Historic Report and assessment contained in the DAS has been produced to assess the significance of the heritage asset and the impact of the proposal upon this significance. The comments relating to the relevant issues concerning design have directly influenced the overall design of the proposal.

Amenity

LPA comment

- 3.13 The Local Planning Authority raised no significant concerns in relation to residential amenity. Given the separation distances to neighbouring properties and the nature of the proposals, the development is unlikely to result in unacceptable impacts in terms of overlooking, loss of privacy, or disturbance.

- 3.14 Nevertheless, any future application should demonstrate that appropriate levels of amenity are maintained.

Applicant Response

- 3.15 Matters relating to amenity are addressed later on within this Statement, where it is confirmed that the proposal would have no impact upon the existing levels of amenity currently enjoyed by the occupiers of any neighbouring properties.

Ecology

LPA comment

- 3.16 The site is located within an ecologically sensitive area, including consultation zones associated with the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC). The pre-application response confirmed that the proposals have the potential to impact protected species and habitats.
- 3.17 Any future application will need to be supported by appropriate ecological surveys, including assessments of bat activity and other protected species. Sufficient information must be provided to enable the Local Planning Authority to undertake a Habitats Regulations Assessment where necessary.

Applicant Response

- 3.18 The relevant ecological surveys have been produced as discussed later on within this PS.

Landscape

LPA comment

- 3.19 The site lies within the Cotswolds National Landscape, where development must conserve and enhance landscape character and scenic beauty. The pre-application response indicated that the proposed works to the outbuildings and the reinstatement of the swimming pool are unlikely to result in significant adverse landscape impacts, particularly given the existing screening and the relationship of the proposals to the established built form. It was confirmed that as a result, any visual impact upon the wider landscape is likely to be minimal.

- 3.20 It was noted that any future application should demonstrate that the design, siting, and materials respond positively to the local landscape context and do not result in visual harm.

Applicant Response

- 3.21 These points are noted and issues relating to the impact of the proposal upon the landscape are discussed later in this Statement.

4 THE PROPOSAL

- 4.1 The proposed development seeks planning permission and listed building consent for the alteration of existing residential outbuildings, reinstatement of a swimming pool and the replacement of an oil tank.

Outbuilding (01)

- 4.2 Internal and external alterations will provide a pool house comprising a gym, sauna, WC and garden store.
- 4.3 The empty openings on the south-eastern elevation will be replaced with bespoke glazed doors and windows. On the north-eastern elevation, a new window is proposed, whilst on the south-western elevation a new door is proposed. On the north-western elevation an existing door will be infilled to rationalise the arrangement of openings.
- 4.4 The existing timber lean-to will be removed from the rear as it has fallen into a state of disrepair. The existing timber cladding on the external wall will be removed and replaced with solid stone.
- 4.5 On the rear elevation, the existing cementitious mortar will be removed and the stone wall traditionally re-pointed in lime mortar.
- 4.6 The existing roof will be carefully dismantled and reinstated to its original pitch, following the line of the existing roof trusses. Given this, the height of the building will increase slightly. The existing clay pantiles will be retained and reinstated on the restored roof wherever possible.
- 4.7 On the interior, the existing later partitions will be carefully removed and new partitions erected. New floor finishes are proposed throughout the entire building with a rubber gym floor in the gym, stone floor in the garden room and cement tile floor in the WC.

Outbuilding (02)

- 4.8 No changes are proposed to the external finishes of outbuilding 02 save for the removal of a cage. Outbuilding 02 will be used as a plant room, workshop, pool store, bin store and garage, similar uses to what exist within it currently.

Reinstatement of swimming pool

- 4.9 Reinstatement of the swimming pool outside of Outbuilding 01, measuring 15 x 6 metres.
- 4.10 The new pool would match the exact positioning of the previous pool.

Oil tank

- 4.11 A replacement oil tank is proposed to the rear of Outbuilding 02, to ensure it meets the OFTEC guidance or Building Regulations Part J.

5 PLANNING POLICY CONTEXT

- 5.1 In line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the proposals have been assessed against the relevant development plan for this site which includes the Wiltshire Core Strategy (adopted January 2015) and Saved Policies in the North Wiltshire Local Plan 2011. Other material considerations include the National Planning Policy Framework (NPPF) (published 2026), and the Wiltshire Design Guide (adopted 25th March 2024).

Wiltshire Core Strategy

- 5.2 The following policies of the Wiltshire Core Strategy are considered particularly relevant to the proposed development:
- 5.3 **Core Policies CP1 ‘Settlement Strategy’ and Core policy 2 ‘Delivery Strategy’** set out the spatial strategy for sustainable development across Wiltshire. These policies direct new development to the most sustainable locations which are primarily market towns, local service centres and large villages. The principle of domestic extensions and alterations within the curtilage of existing dwellings is however considered acceptable as outlined within the pre-app response.
- 5.4 **Core Policy 48** relates to supporting rural life and sets out a number of exceptions to development in the open countryside.
- 5.5 **Core Policy 50** states that *“development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity, and functionality in the long term.*

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

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

All development should seek opportunities to enhance biodiversity.

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

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

- i) *The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies.*
- ii) *The locally distinctive character of settlements and their landscape settings.*
- iii) *The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.*
- iv) *Visually sensitive skylines, soils, geological and topographical features.*
- v) *Landscape features of cultural, historic and heritage value.*
- vi) *Important views and visual amenity.*
- vii) *Tranquillity and the need to protect against intrusion from light pollution, noise, and motion.*
- viii) *Landscape functions including places to live, work, relax and recreate.*
- ix) *Special qualities of Areas of Outstanding Natural Beauty (AONBs) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty.*

5.7 *Proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), shall demonstrate that they have taken account of the objectives, policies and actions set out in the relevant Management Plans for these areas. Proposals for development outside*

of an AONB that is sufficiently prominent (in terms of its siting or scale) to have an impact on the area's special qualities (as set out in the relevant management plan), must also demonstrate that it would not adversely affect its setting."

5.8 **Core Policy 52** states that development shall make provision for the retention and enhancements of Wiltshire's green infrastructure network. If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required.

5.9 **Core Policy 57** illustrates that *"a high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through:*

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

5.10 **Core Policy 58** states *"that development should protect, conserve and where possible enhance the historic environment. Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including:*

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

Distinctive elements of Wiltshire's historic environment which contribute to a sense of local character and identity will be conserved, and where possible enhanced. The potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping).

Heritage assets at risk will be monitored and development proposals that improve their condition will be encouraged. The advice of statutory and local consultees will be sought in consideration of such applications."

Material Considerations

The National Planning Policy Framework (NPPF) published August 2026

5.11 **Policy S3: Presumption in favour of sustainable development**

"Decisions on development proposals should apply a presumption in favour of sustainable development. This means:

- a) Policy S4 in this Framework should be applied when considering development proposals within settlements;*
- b) Outside settlements, policy S5 should be applied; and*
- c) In all locations, development proposals that accord with both an up-to-date development plan and the decision-making policies in this Framework should be approved without delay."*

5.12 **Policy S5** assesses the principle of development outside any defined development boundary. Part 5) of this policy is of relevance which states:

"This policy does not apply to development proposals in the Green Belt or on land designated as Local Green Space, which should instead be determined in accordance with policies HC8, GB6, GB7 and/or GB8 (as appropriate). However, where development would

not be inappropriate in these locations (through the application of policies HC8 and GB7), proposals should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework, and applying paragraph 2 of this policy.”

5.13 Paragraph 2) of this policy states:

“In applying this policy, the circumstances in which the benefits of approving development proposals are likely to be substantially outweighed by adverse effects include, but are not restricted to, situations where the development proposal would fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.”

5.14 **Policy CC2** sets out that *“In order to contribute to climate change mitigation and the transition to net zero, development proposals should, where relevant to the proposal:*

- *Use design approaches which conserve energy and other resources in accordance with policy DP3(1)(c);*
- *Take advantage of opportunities to re-use existing structures and materials, including by re-using non-contaminated excavated soil and hardcore within the site;*
- *Take advantage of opportunities to draw low carbon energy from decentralised networks (such as district heat networks), where these are available, and to co-locate energy and heat generators and users, especially to take advantage of suppliers of surplus heat and energy;”*

5.15 **Policy GB6: Control of development in the Green Belt**

1. *“Development in the Green Belt is inappropriate unless it falls within one of the categories in policy GB7.*
2. *Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Such circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposed development, is clearly outweighed by other considerations. In making this assessment, substantial weight should be given to the harm to the Green Belt which would be caused, including harm to its openness.”*

5.16 **Policy GB7: Development which is not inappropriate in the Green Belt**

Policy GB7 confirms that the following categories of development are not inappropriate in the Green Belt, and therefore should not be regarded as harmful to the Green Belt or be required to demonstrate very special circumstances:

(...)

- b) *“The re-use, extension, alteration or replacement of an existing building, provided that the existing building is of permanent and substantial construction, is lawful in planning terms, and any extension or alteration will not result in a disproportionate increase in size compared to the original building.*

(...)

- f) *Certain other forms of development provided the impact on the openness of the Green Belt is minimised, and there would not be a significant conflict with the Green Belt purposes. These are:*
- i. *Mineral extraction and processing, **engineering operations**, and transport, electricity network, water and telecommunications infrastructure required in a Green Belt location).” [own emphasis added].*

5.17 **Policy DP3** states that *“Development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings; such as through the arrangement of development plots and buildings, the use of materials and architectural features, and the restoration, reuse and integration of heritage assets.”* The policy also comprises the key principles for well-designed places that development proposals should reflect where relevant:

- *Climate: contribute to climate change mitigation and adaptation and the transition to net zero, by using building layouts, building orientation, massing, landscaping and materials which conserve energy and other resources, and which minimise risks from the impacts of climate change including overheating;*
- *Nature: incorporate and/or connect to a network of high quality, accessible, multifunctional green infrastructure to provide opportunities for recreation and healthy living, strengthen habitats, improve climate change resilience and improve air and water quality. This should include maintaining and enhancing tree cover and incorporating sustainable drainage systems in accordance with policies NE3 and F8; and*

- *Identity: create visually attractive, distinctive and characterful development to establish or maintain a strong sense of place and pride, including through the use of a coherent palette of materials, design features and planting”.*

5.18 The policy goes on to state that development proposals that are not well designed should be refused if, without clear justification, they conflict with paragraph 1 of this policy or relevant aspects of the principles in paragraph 2, or with any explicit design standards set out in the development plan (including those in locally specific policies, guides, codes or masterplans). Substantial weight should be given to compliance with relevant development plan policies when assessing the design quality of proposals.

5.19 **Policy DP4** states that quality should be considered throughout the evolution, assessment and delivery of development proposals, including through any pre-application engagement.

5.20 **Policy N2** sets out that developments should

1. *“Contribute positively to the natural environment and support nature’s recovery development proposals should:*

a) *Consider the environmental qualities of land proposed for development, including habitats, landscape character and the natural beauty of the countryside, and identify opportunities for those qualities to be conserved or enhanced (including through requirements for biodiversity net gain where these apply;*

(...)

d) *Conserve and enhance existing natural features of visual, historic or nature conservation value*

f) *Minimise impacts on biodiversity and include features for species which support priority or threatened species such as swifts, bats and hedgehogs. Development proposals should incorporate integrated nest boxes (commonly known as swift bricks) into their construction unless there are compelling technical reasons which prevent their use, or would make them ineffective; and*

(...)

5.21 Part 2 states that *“If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated or, as a last resort, compensated for, then the development should be refused.”*

- 5.22 **Policy N4** states that development proposals within Protected Landscapes should be limited in scale and extent and sensitively located and designed to avoid harm to their statutory purposes and special qualities of the Protected Landscape. Substantial weight should be placed on the importance of conserving and enhancing the natural beauty of these areas.
- 5.23 **Policy HE4** states heritage assets, as an irreplaceable resource, should be conserved and enhanced in a manner appropriate to their significance. To achieve this, development proposals which would affect the significance of heritage assets, including any contribution made by their setting should:
- a) *“Maintain or secure a use consistent with their conservation, taking into account the importance of maintaining the assets, the positive contribution they can make to sustainable communities including local economies, and the positive contribution they can make to local character and distinctiveness; and*
 - b) *Avoid (or if that is not possible, minimise) harm to the significance of heritage assets, and instead conserve this significance.”*
- 5.24 **Policy HE5** states that *“Development proposals affecting heritage assets should be accompanied by an assessment of the significance of the assets affected (including any contribution made by their setting) and of the potential effect of the proposal on their significance.*
- 5.25 **Policy HE6** states that when considering the potential effect of a development proposal on the significance of a designated heritage asset, substantial weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance. Development proposals which would have a positive effect on designated heritage assets should be approved.

Wiltshire Design Guide

- 5.26 **Paragraph 4.5.19** states that *“Restoration work to historic buildings should generally be faithful to and closely match the appearance of the original work, in terms of detailing and facing materials/finishes.”*

5.27 **Paragraph 4.5.20** states that *“in conservation areas, or within the setting of listed buildings, it should be demonstrated that the detailing of new development will not cause a detrimental visual impact. Reference should be made to Historic England’s suite of design guidance.”*

6 CONSIDERATION OF PLANNING POLICY ISSUES

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

Principle of development

- 6.4 The site sits within the open countryside as defined in planning policy terms. The adopted development strategy seeks to restrict development in the open countryside save for few exceptions. These are listed in Core Policy 48 but none are relevant to the proposal noting that the development will not introduce a new use, it simply seeks to deliver proposals within an existing residential curtilage. Given this, the development plan is silent as it does not consider works within the curtilage of an existing dwelling.
- 6.5 Notwithstanding the above, the nature of the proposals, comprising limited development within a defined residential curtilage associated with the main residential use, is not considered to harm the purpose of Core Policy 48 which is to 'support rural life'.
- 6.6 Core Policy 48 provides support for proposals that sustain rural communities, including the ongoing viable use and adaptation of existing residential properties. In this case, the proposal in the majority does not introduce new built development into the countryside, save for the oil tanker to the rear of Outbuilding 02. The overall proposal represents the re-use and enhancement of established residential built form through the sensitive adaptation of existing outbuildings and the reinstatement of a former feature.

- 6.7 The proposed internal and external works to the outbuildings are modest in scale and are primarily concerned with improving their functionality and securing their long-term viable use as ancillary accommodation. In doing so, the works ensure that these historic structures remain in active and appropriate use, thereby contributing positively to the conservation and ongoing maintenance of the wider heritage asset.
- 6.8 The reinstatement of the swimming pool similarly reflects the re-establishment of a previously approved and implemented feature within the domestic curtilage, rather than the introduction of a new form of development. Its location, scale and domestic nature mean it remains clearly subordinate to the host dwelling and visually contained within the existing garden setting, avoiding any encroachment into the open countryside.
- 6.9 The introduction of an oil tank to the rear of Outbuilding 02 also comprises very limited new development within the open countryside, but within an existing residential curtilage. As such, its development is not considered harmful to the Council's adopted development strategy.
- 6.10 The planning balance contained in Section 38(6) will be undertaken further below, where it will be deemed planning permission can be granted.
- 6.11 It is worth noting that the pre-application response did not identify any objections to the principle of development.
- 6.12 Notwithstanding the above, the revised NPPF represents a material consideration which provides a clear assessment of how proposals should be determined in principle which sit outside any defined development boundary. As the site sits within the Green Belt and is deemed appropriate development in the Green Belt (as detailed below), part 5) is of relevance which states, where development is deemed appropriate in the Green Belt, the proposals should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework, and applying paragraph 2 of this policy. Paragraph 2 of Policy S5 contains a similar assessment.
- 6.13 This exercise will be detailed in the Planning Balance section where it will be concluded that the proposals can be deemed acceptable in principle.

Green Belt Considerations

- 6.14 The site sits within the Green Belt where development is, by definition harmful, save for few exceptions. Policy GB7 b) defines the alteration to an existing building can be deemed

acceptable provided the building is of permanent and substantial construction, is lawful in planning terms, and the alteration will no result in a disproportionate increase in size compared to the original building. This part of the policy relates to the alterations to the outbuildings.

- 6.15 Policy GB7 f) i) outlines engineering operations are deemed appropriate, which would relate to the proposed swimming pool. Such proposals are permissible in the Green Belt as long as impact on the openness of the Green Belt is minimised and there would not be a significant conflict with the Green Belt purposes.
- 6.16 It is noted that, in relation to the proposed swimming pool, the LPA's pre-application response requests that an identification of what constitutes the 'original building' is required. However, the provision of the swimming pool involves excavating a large hole in the ground and filling it with water, as such, it is considered that this development falls under engineering operations rather than an extension or alteration of a building.
- 6.17 What was originally Paragraph 154 c) of the NPPF, now Policy GB7 B) is therefore not relevant to the proposed reinstatement of the pool, but rather an engineering operation as detailed in part f) i). This paragraph confirms that engineering operations are considered to be appropriate development providing that the impact of the proposed development will minimise the openness of the Green Belt and ensuring that it does not significantly conflict with the purposes of including land within it. Taking each of these in turn.
- 6.18 The proposed swimming pool will be located within the existing residential curtilage which is contained by dense hedgerows, vegetation and existing buildings, it will therefore be well screened. The proposed pool will not therefore encroach out into the open countryside beyond the confines of the existing residential curtilage. Furthermore, the proposed pool will not be enclosed by any form of built structure. As a consequence, it is evident that it will not affect the openness of the Green Belt. It should also be reminded that a swimming pool existed on site around 1973.
- 6.19 Policy GB2 1) of the NPPF outlines five purposes of including land within the Green Belt. Each of these purposes are addressed against the proposal below:
- a) The proposal will not cause the sprawl of a large built-up area;
 - b) The proposal will not cause neighbouring towns to merge into one another;
 - c) The proposal is contained within the existing residential curtilage and as such will safeguard the countryside from encroachment;

- d) The proposal will have no impact on the setting and special character of any historic town;
- e) The proposal will have no impact on urban regeneration.

6.20 It is evident therefore that the proposed swimming pool is an entirely appropriate form of development in the Green Belt and therefore meets Policy GB2 f) i).

6.21 With reference to Outbuilding 01 and 02, Policy GB2 b) of the NPPF relates to the alteration of a building with a criteria attached to such a proposal to ensure it is permissible in the Green Belt. Taking each of these in turn.

6.22 The existing buildings are clearly of permanent and substantial construction, made of stone. Both buildings comprise a lawful residential use in association with Coles Farmhouse.

6.23 The final matter to address is whether the proposed alterations will result in a disproportionate increase in size compared to the original building. The LPA within the pre-application response assessed this element of the proposal in the context of the definition of an 'original building' as contained in the NPPF:

"Original building: A building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally."

6.24 Reference was then made to the Historic Report that supported the pre-application which includes a phasing diagram of when the various buildings, including the main house, were constructed. Utilising this, they consider that a number of additions have been delivered overtime and therefore questioned whether the alterations to the existing outbuildings would amount to a disproportionate amount of building over and above the size of Coles Farmhouse. This assessment however, is incorrect insofar that the original building should be based on the buildings subject of the proposal, i.e. outbuildings 01 and 02. In this context, the proposed alterations are not considered disproportionate to outbuildings 01 and 02 noting that the proposal comprises minimal intervention which results in the outbuildings remaining identical in scale to the existing. As such, Policy GB7 b) of the NPPF is complied with.

6.25 Therefore, both the reinstatement of the swimming pool and the internal and external works to the outbuildings are appropriate forms of development within the Green Belt.

6.26 The erection of an oil tank replaces an existing oil tank within Outbuilding 02 to ensure it meets OFTEC guidance or Building Regulations Part J. Whilst not necessarily a building, as the oil tank will replace an existing, the proposal has also been considered under Policy GB7 b) of the NPPF which allows for a replacement in principle so long as it is in the same use and not

materially larger than the one it replaces. Given the nature of the proposal, it is concluded that the relocated oil tank meets complies with this policy and is therefore permissible development in the Green Belt.

- 6.27 As such, in line with the draft NPPF, the proposals are deemed appropriate development in Green Belt terms.

Heritage and Design Considerations

- 6.28 Core Policy 57 and Policies DP3 and DP4 of the NPPF require that all development proposals comprise high quality and sustainable design that responds well to the local vernacular of the site. In this case, particular regard has been given to the national historic significance of the host dwelling, its historic setting, ensuring that alterations to the curtilage listed outbuildings are respectful to the significance of the site.
- 6.29 Consequently, consideration has been given to ensuring that the historic significance of the aforementioned assets is conserved and enhanced in line with Core Policy 58 and Policy HE4 of the NPPF. Accompanying this planning application is a Historic Report which comprises a Statement of Significance meeting the requirements of Policy HE5 of the NPPF.
- 6.30 Outbuildings 01 and 02 are considered curtilage listed, but both have undertaken some modern alterations.
- 6.31 With regard to Outbuilding 01, its significance lies in its overall footprint and general appearance that has its origins in farm use. The proposed works to Outbuilding 01 amount to a number of heritage benefits to the setting of the Grade II* listed farmhouse and the significance of the outbuildings. With regard to the replacement roof and slight increase in height, this is concluded as being a substantial beneficial impact to the proposals by restoring the original roof profile. The removal of the modern structures attached to the north west elevation of the outbuilding and replacement of timber to stone walling is concluded as having a substantial beneficial heritage impact. The removal of the existing cementitious mortar and repointing of the stone wall in lime mortar comprises a substantial beneficial heritage impact. The replacement of partitions is considered to be a moderate beneficial heritage impact.
- 6.32 The inclusion of glazing along the south eastern elevation is concluded as having a nil/negligible neutral heritage impact. The new door opening proposed on the south-western elevation will provide independent external access to the garden store, which will avoid having to make a new opening on the more visible, south eastern elevation. A new single window is proposed on the

north-east elevation to provide natural light to the proposed WC, which avoids any new openings on the more visible frontage facing the house. These interventions would amount to the loss of a small amount of masonry, and overall amount to a minor neutral impact upon the fabric of the building when considered in balance with the other beneficial aspects of the proposals.

- 6.33 With regard to the stable building, no external works are proposed and the only internal work proposed is the removal of an existing modern cage structure within one of the internal spaces.
- 6.34 In terms of the swimming pool, this is located where a previous swimming pool existed in the 1970s. As historically a pool existed in this location, it is not considered to cause harm to the setting of the Grade II* listed building or curtilage listed buildings. Instead the proposals will have a neutral impact upon the heritage significance of building and visual setting of Coles Farmhouse.
- 6.35 Given the minimal intervention, and the proposed use of material and design changes that are sympathetic to the historic character of the site, the proposals are overall considered to conserve and enhance the historic significance of the setting of Coles Farmhouse and the significance of the curtilage listed buildings. Where there is a minor neutral impact on Outbuilding 02, this is outweighed by the number of heritage benefits attached to the scheme.
- 6.36 As such, the proposals comply with Core Policies 57 and 58 and Policies HE5 and HE6 of the NPPF. Indeed, in line with paragraph 2) of Policy HE6, the LPA should support the proposals as they will have a positive effect on the designated heritage asset.
- 6.37 Given the above, it is considered the comments raised at pre-application stage have been addressed.
- 6.38 Given the compliance with relevant local design planning policies, in line with Policy DP3 3) of the NPPF, substantial weight can be applied to the proposed development.

Cotswold National Landscape

- 6.39 The site sits within the Cotswold National Landscape where Policy N4 of the NPPF and Core Policy 51 seeks to conserve and enhance its special landscape qualities and characteristics. Policy N4 also states that proposals within the National Landscape should be limited. The limited scale of the proposals therefore meets this policy requirement.

- 6.40 As the proposal is contained within an existing residential curtilage, it will not cause harm to the landscape character and special qualities of this part of the National Landscape. Whilst there are PROW routes near to the site, the site is well screened with existing vegetation.
- 6.41 Notwithstanding, the internal and external alterations to the outbuildings will be contained in existing built form that already forms part of the character of this part of the landscape. In regard to the reinstatement of the swimming pool, the area where it is proposed is screened from existing boundaries and therefore will not have any effects on the National Landscape. Finally, the new location of the oil tank is within an area that will be appropriately screened such that it will not be seen from any public vantage points.
- 6.42 The LPA's response pre-application response reflects this stating that *"any visual impact upon the wider landscape is likely to be minimal."*
- 6.43 Consequently, the proposals comply with Core Policy 51 and Policy N4 of the NPPF.

Trees

- 6.44 The proposal seeks to remove a tree to accommodate the reinstatement of the swimming pool. This tree is a Category C tree and therefore its removal is considered acceptable. To comply with Core Policy 52, the Applicant is happy to plant a new tree of similar value and quality elsewhere within their curtilage.

Ecology

- 6.45 A Preliminary Bat Roost Assessment, subsequent bat activity surveys and Great Crested New surveys have been undertaken to ensure that the proposed development aligns with Core Policy 50 which puts emphasis on the preservation of natural features and habitats.
- 6.46 The further bat survey work was undertaken following the initial Preliminary Bat Roost Assessment. This confirmed that the outbuildings support a low number of brown long-eared, lesser horseshoe and greater horseshoe bats. Only a small number of bats were recorded of these species however, given the conservation importance of these bat species, certain mitigation and enhancement measures are proposed to ensure that the proposals protect, conserve and enhance their ecological significance. This includes a bat loft that is proposed within Outbuilding 01 designed specifically for horseshoe bats. With regards to lighting, this will need to be carefully considered in line with the Bat Conservation Trust and Institution of Lighting

Professionals Guidance Note 08/23 *Bats and Artificial Lighting at Night*. The Applicant is willing to accept a suitably worded condition to ensure the proposals comply with this guidance.

- 6.47 The Great Crested Newt Survey report confirmed that the two ponds located within the domestic residential curtilage of the property had no presence of Great Crested Newts. Precautionary measures are proposed to ensure the relevant planning policy test is met.
- 6.48 As such, the proposals comply with Core Policy 50 and Policy N2 of the NPPF.

7 SUSTAINABLE DEVELOPMENT AND PLANNING BALANCE

Sustainable form of development

- 7.1 The proposals are considered to comprise a sustainable form of development, having regard to the objectives set out in paragraph 17 of the NPPF.
- 7.2 Economically, the proposals will deliver short-term job prospects locally for those who will be instructed to construct the outbuilding. Socially, the proposals enhance the prosperity of the Applicant's family to remain within the local area, meeting the needs of family living. Environmentally, the proposals seek to conserve and enhance the curtilage listed buildings and setting of Coles Farmhouse, the site's situation in the Cotswold National Landscape, and preserve and enhance biodiversity on site.

Planning balance

- 7.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise. Relevant development plan policies have been considered in relation to design, heritage, landscape, trees and ecology where it is concluded that the proposed development complies with these policies within the development plan.
- 7.4 Whilst the proposal does not represent any of the exceptions to development in the open countryside as contained in Core Policy 48, the proposal does support the general thrust of his policy. Therefore, when taken as a whole, the proposal is considered to comply with the development plan and therefore, in line with Section 38(6), planning permission should be granted without delay.
- 7.5 However, as a secondary argument, as the Local Plan is now out of date and therefore is no specific planning policy relevant to the principle of development, material considerations such as the NPPF should also be considered.
- 7.6 With reference to Policy S5, this Statement has demonstrated that the proposals are deemed appropriate development in the Green Belt. Therefore, in line with part 5) of this policy, the proposals should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects when assessed against the national decision-making policies in the NPPF, and applying paragraph 2 of Policy S5.

- 7.7 Overall, it is concluded that the proposals present no adverse impacts such that the planning balance supports the proposals in principle, in line with paragraphs 2) and 5) of Policy S5.
- 7.8 Consequently, in line with Policy S3 of the NPPF, the presumption in favour of sustainable development applies.
- 7.9 As a result, in either scenario, planning permission and listed building consent can be granted.

8 CONCLUSIONS

- 8.1 This Planning Statement has been prepared by Morgan Elliot Planning Ltd on behalf of our client Webster Hart to accompany a householder and listed building consent application for a series of internal and external works to outbuildings, the reinstatement of a swimming pool and replacement oil tank at Coles Farmhouse (List Entry Number: 1022715) at Coles Farm, Alcombe following pre-application advice from Wiltshire Council.
- 8.2 The applicant wishes to sensitively enhance the functionality of the existing outbuildings to meet modern living requirements, along with the reinstatement of the swimming pool to also enhance living standards, while safeguarding the architectural and historic significance of the Grade II* listed farmhouse.
- 8.3 It has been demonstrated that the proposals are acceptable in principle and comprise appropriate development in Green Belt terms. It has also been demonstrated that the proposals conserve and enhance the special architectural interest and character of the Grade II* listed host dwelling and comprise a high-quality design.
- 8.4 The proposals will not cause any impact on ecology that cannot otherwise be suitably mitigated and enhanced.
- 8.5 This Statement concludes that the proposals comply with the development plan when read as as whole and therefore planning permission and listed building consent should be granted without delay.
- 8.6 As a secondary argument, the proposals also comply with the NPPF and the presumption in favour of granting planning permission in line with Policy S3 applies.

Appendix 1 – ENQ/2025/01728

Pre Application Response

8th January 2026

Application No:	ENQ/2025/01728
Application Type	Pre-Application Enquiry
Proposal:	Proposed internal and external works to an existing dwelling and residential outbuildings, and the reintroduction of a swimming pool.
Location:	Coles Farm, Alcombe, Corsham, SN13 8QL
Case Officer:	Gabrielle Crabtree

Dear Sir/Madam,

Thank you for your pre-application enquiry received on 24 October 2025.

Please note that the advice below represents an officer's informal professional opinion based on the information provided at the time of writing. It is given without prejudice to any formal decision the Council may make on a subsequent planning application.

Any future application would be subject to full assessment, including site publicity and consultation, and other material considerations may emerge through that process. This advice is based on current adopted planning policies and guidance available at the time of writing.

Summary of Officer View

☒ **Acceptable in principle.** This response sets out areas to be addressed through any subsequent application.

Constraints:

The site is subject to the following relevant planning designations and constraints:

- Cotswolds National Landscape (Formerly AONB)
- Historic Buildings Sites and Monuments Records – Coles Farm
- Historic Buildings Sites and Monuments Records – Coles Farmhouse
- Historic Buildings Sites and Monuments Records – Cole's Farm
- Areas Susceptible to Ground Water Flooding
- Groundwater Vulnerability
- Listed Buildings - COLES FARMHOUSE II*
- Green Belt - North Wiltshire
- Bath BoA Bat SAC GHS 4km Core Roost buffer - Box, The Grille
- Bath BoA Bat SAC GHS 4km Core Roost buffer - St Catherine
- Bath BoA Bat SAC GHS 4km Core Roost buffer - Brown's Folley
- Bath BoA Bat SAC GHS 4km SAC parcel buffer - Bath & Bradford on Avon Bats
- Risk of Flooding from Surface Water (RoFSW) with Climate Change – Low
- Risk of Flooding from Surface Water (RoFSW) – Low
- SFRA 2024 Appendix G Groundwater Emergence - Groundwater levels are between 0.5m and 5m below the ground surface
- SFRA 2024 Appendix G Groundwater Emergence - Groundwater levels are at least 5m below the ground surface

- SFRA 2024 Appendix I Sewer Flood Incidents - Number of Flood Incidents: 1
- Archaeology Monuments Lines - Coles Farm
- Archaeology Monuments Polygons - Coles Farmhouse, Alcombe

Relevant Planning History:

Proposal / Summary
16/06087/PREAPP - Pre-Application enquiry Decision - Pre-App Response Date: 26/9/2016 – Replacement Windows
N/11/01909/FUL - Full planning permission Decision - Approve with Conditions Date: 6/9/2011 – Relocating Boundary Wall
N/11/01914/LBC - Listed building consent Decision - Approve with Conditions Date: 6/9/2011 – Relocating Boundary Wall
N/90/00015/FUL - Full planning permission Decision - Approve with Conditions Date: 4/5/1990 – ERECTION OF DOUBLE GARAGE
N/90/00073/LBC - Listed building consent Decision - Approve with Conditions Date: 4/5/1990 – ALTERATIONS WITHIN THE CURTILAGE OF A LISTED BUILDING - DOUBLE GARAGE
N/93/01044/FUL - Full planning permission Decision - Approve with Conditions Date: 13/7/1993 – REMOVAL OF EXISTING GREENHOUSE AND ERECTION OF NEW GREENHOUSE ON EXISTING FOUNDATIONS REPLACEMENT GREENHOUSE

Relevant Planning Policies:

The development plan for Wiltshire comprises the *Wiltshire Core Strategy (WCS)* (adopted January 2015) and any made neighbourhood plans, which remains the principal statutory planning document guiding development across the county. In line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise.

Though the development plan is considered as a whole, those parts deemed to be particularly relevant to this pre-application enquiry are listed below:

The adopted *Wiltshire Core Strategy (WCS)*, with particular regard to:

- Core Policy 1 Settlement Strategy;
- Core Policy 2 Delivery Strategy;
- Core Policy 3 Infrastructure Requirements;
- Core Policy 50 Biodiversity and Geodiversity;
- Core Policy 51 Landscape
- Core Policy 57 Ensuring High Quality Design and Place Shaping;
- Core Policy 58 Ensuring the Conservation of the Historic Environment;
- Core Policy 60 Sustainable Transport;
- Core Policy 61 Transport & Development;
- Core Policy 62 Development Impacts on the Transport Network;
- Core Policy 64 Demand Management
- Core Policy 67 Flood Risk;
- Core Policy 68 Water Resources;

Emerging Policy – Wiltshire Local Plan Review:

The Council's draft Local Plan (Regulation 19 stage, 2023) is a material consideration but carries limited weight at this stage.

National Planning Policy Framework (NPPF)

Consultation

Wiltshire Council Conservation Officer:

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

The proposed repairs appear logical and well considered.'

Wiltshire Council Drainage Engineer: Support. Full comments have been appended to this opinion.

Wiltshire Council Archaeologist: No objection:

Wiltshire Council Ecology: Comment:

Any formal planning application at this site should have regard for the following constraints and specific areas of ecological interest:

Bath and Bradford-on-Avon Bats Special Area for Conservation (SAC)

- The site lies within a consultation zone for Greater Horseshoe bats associated with the Bath and Bradford-on-Avon Bats SAC and therefore has potential to result in significant adverse impact on the special features of that site. Appropriate Assessment (AA) under Section 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) must be carried out by the relevant Competent Authority (the LPA) to determine the potential significant effects and the suitability of any measures proposed to avoid or mitigate those effects.*

Sufficient information must be submitted to enable the AA to be undertaken, which must be completed and the conclusion agreed with Natural England prior to any application being approved at this site. Such information will comprise a suitably detailed study of how bats currently use the site, including roosting, foraging and commuting. A clear statement of any vegetation proposed for removal and proposed mitigation, e.g. by alternative or supplementary planting, must also be included in order for this to be included in the Appropriate Assessment. Please see Wiltshire Council website for further information on this issue: Writing ecological surveys to inform the planning - Wiltshire Council.

County Wildlife Site (CWS)

- Briary Wood, Alcombe lies 60m northeast of the site. Wiltshire Core Policy 50 requires that CWSs are protected from the effects of development and should be enhanced where possible. Assessment of impacts to the CWS, together with proposals*

for mitigation and enhancement will be required to support any planning application at this site.

Protected Habitats and Species

- There is a recorded bat roost 460m north of the site, which suggests the potential for bat activity on site. Sufficient survey of the enquiry site must be undertaken in order to identify any key flight lines potentially used by bats from this roost and to enable mitigation, such that functionally linked habitat can be retained and enhanced. Please see the following link: Biodiversity and development - Wiltshire Council.*
- There is a pond within 200m to the south of the site. There is therefore potential for destruction and disturbance of Great Crested Newts and their habitat. GCN are a European Protected Species and if found to be present within 500m of the site, may require significant mitigation. However, Wiltshire operates the Natural England GCN District Level Licensing Scheme and the applicant may wish to apply for certification under this scheme. The consultant ecologist can advise on the merits of the scheme in relation to any application made at this site. Please see the Wiltshire Council website for further information on this issue: Biodiversity and development - Wiltshire Council.*
- There are existing records for protected species within the local area, including Lesser Horseshoe Bat, Pipistrelle Bat, Barn Owl, Kestrel, Badger, Otter, Great Crested Newt (some listed as being of national importance). Any proposal for development at this site will be required to demonstrate no net loss of functional habitat for biodiversity, within the local area, in line with Wiltshire Core Policy 50 (CP50) and NPPF, through provision of ecological survey reports.*

In carrying out its statutory function, the Local Planning Authority must be reasonably sure that protected habitats and species are not adversely affected by development. It is therefore vital that sufficient information is submitted in support of an application, to enable this. Information is expected to include report of comprehensive survey together with appropriate and sufficient mitigation to remove or at least substantially reduce any adverse effects that could occur as a result of implementing the proposal.

Neighbourhood Plans

- The site lies within the area covered by the Box Parish Neighbourhood Plan Area. Further information can be found at Made plans - Wiltshire Council.*

Biodiversity Net Gain

- Biodiversity Net Gain is mandatory from 12th February 2024 (Major sites) and 2nd April 2024 (minor sites). Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) applications are required to deliver 10% Biodiversity Net Gain (BNG). It applies to most but not all development. Any small scale (non major) or major scheme that you may decide to pursue on this site will therefore need to demonstrate that no net loss and a minimum of 10% net gain in biodiversity on the site is to be provided, in line with the requirements of the NPPF, WCS policy CP50 (Biodiversity and Geodiversity) and the Environment Act.*

Details of the current baseline (using UK Habitats Classification) and a demonstration of the net gain calculation, using the current version of the metric and presented as unlocked spreadsheets, will be required in support of your application. Please see this

link for further information: *Understanding biodiversity net gain - GOV.UK*
(www.gov.uk).

In line with NPPF and with CP50, applications that do not fall into the category where BNG is required, must still ensure that no net loss of functional habitat for the benefit of wildlife in the local area will occur as a result of the proposed development. In addition, it is expected that gains for biodiversity, relevant to local habitats and wildlife populations will form part of the proposed development.

This pre application information aims to support the developer in preparing a planning application by identifying potential risks and opportunities. Officers of the council give advice based on their professional judgement in the current circumstances and their knowledge of policy framework. Required ecological surveys and assessment of the development may identify additional risks and constraints which must also be addressed by the application. Please visit Wiltshire Council's web pages for further information regarding ecological survey requirements for support of a planning application at Biodiversity and development - Wiltshire Council.

PLEASE NOTE: Any Habitats Regulations Assessment required under Section 63 of the Habitats Regulations must be carried out by the relevant Competent Authority (the LPA), must be concluded favourably by the LPA and endorsed by Natural England in order for an application to be lawfully approved. This process must therefore be completed before a favourable determination of the application can be made.

Assessment

Coles Farm is a Grade II* Listed residential dwelling, set within a large and relatively isolated plot. Coles Farm is located within the hamlet of Alcombe, on the edge of the village of Box. The property lies in a rural setting, surrounded by open countryside, agricultural land and scattered residential properties. The site is centred around a six-bedroom Grade II* Listed farmhouse (List Entry Number: 316858), accompanied by several residential outbuildings and garden land extending beyond the buildings. The property is described by Historic England as follows:

ST 86 NW BOX ALCOMBE

2/2 Coles Farmhouse

20 12 60 II*

House, dated 1648 and 1685, rubble stone with stone tiled roof, coped gables and paired diagonal end wall stacks. Two and a half storeys with additional attic, L plan. Recessed ovolo-moulded mullion windows. East front with 2 gables, each with single light over 3-light window, both with hoodmoulds. First floor, two 2-light windows to left under single hoodmould, ground floor 3-light each side of 2-light window, replacing door, continuous hoodmould stepped; over the 2-light window. C20 lean-to to right connecting with C20 projecting gabled single storey kitchen. Left gable dated PW 1646, right gable E/W/S 1685. South gable end is paired with south gable on rear wing. Hipped dormer between gables. Attic blank keyed oval over 2-light window with hood to left gable, first floor 3-light with hood and relieving arch to left, 2-light with hood to centre and 2-light with hood to right side. Ground floor: 4-light with king-mullion has relieving arch left, centre 2-light window, under linked hoodmoulds. Plank door in moulded Tudor- arched surround with impost, keystone and hoodmould to right side. Left side has moulded plinth stepped over two 2-light basement windows. West gable end, coped gable, blank oval in apex, 2-light attic window with dripstone, 3-light first floor window with hood and relieving arch and 4-light ground floor window with dripcourse stepped over window. North side-wall paired diagonal stacks, single light and 2-light window with hoodmoulds to first floor, similar windows below with stepped dripcourse. To left 3 stepped stair lights with hoodmould. Rear of

main front has gable with 3- light attic window and hood, 2 first floor 2-lights with continuous hood and ground floor door in moulded doorcase with single light to left and 2-light-to right, all with hoods. North end gabled has attached outbuilding with ground floor single light and hood to left of stone steps up to upper door flanked by small 4-light pointed vent loops. Above left vent loop, a late medieval 2-light small window with ogee heads to lights. West side has one ground floor 2-light ovolo-moulded window with hood. To left of gable-end a reset Tudor-arched doorcase with hood. Interior has chamfered and stopped beams, large north end elliptical arched chamfered stone fireplace and south end Tudor- arched moulded fireplace with moulded shelf. Dog-leg stair with flat balusters and acorn finial newel posts. South-west room has C17 plaster frieze of griffins flanking shields and plaster decoration to ceiling. Fine C17 stone fireplace with fluting in frieze and shield spandrels, but not the same fireplace with in frieze fluting and sheild spandels, but not same fireplace as illustrated in late C19 engraving by H.Hall, Archit. Assoc. SketchBook, 3rd set, Vol.7; (N.M.R.). Further Tudor-arched stone fireplaces upstairs. House belonged to the Webb family from c1633.

Listing NGR: ST8111369201

The submitted statement of Significance outlines that the outbuildings formally comprise a cowshed (Outbuilding 01) and stable building (Outbuilding 02) and states that they used for ancillary purposes associated with the main dwelling. A modern garage and store have been attached to these buildings, with a modern glasshouse situated behind the former cowshed (subject of planning permission N/93/01044/FUL).

The proposals relate to proposed internal and external works to the main house, along with alterations to Outbuildings referenced as 01 and 02 and reinstating a swimming pool, all within the residential curtilage of the property. The development and works are summarised as follows:

- Main dwelling

A refurbishment of the main dwelling is proposed to include converting the basement into a wine cellar, which will involve reinstating an existing blocked-up lightwell matching existing lightwells.

On the ground floor, partitions are proposed in the kitchen to create a larger pantry with new joinery in both the kitchen and boot room. A new entrance doorway is proposed to the east facing elevation of the later lean-to passage between the current kitchen and the original core of the building. The current entrance will be sealed.

Existing fireplaces are proposed to be opened up that were previously blocked up and reinstated with stone surrounds matching the existing fireplace in the house.

The space on the north-eastern side of the house will be rationalised with the existing modern partitions removed and new ones instated to create a new, larger master bath and dressing room.

On the second floor, the ceilings in the bedrooms will be raised, allowing for adequate head-height within the rooms. The current bathroom is proposed to become a utility room and new joinery will be installed. The current laundry room will become the bathroom.

- Outbuilding 1 (Former Cowshed)

Internal and external alterations will provide a pool house. The empty openings will be replaced with bespoke glazed doors. On the interior, the existing later partitions will be carefully removed and new partitions erected. The existing blocked up window will be reinstated, and two new windows are proposed on the south-eastern elevation of the building. The windows will match the existing windows of the listed building. The roof of the current timber lean-to shack on the north-western side of the building will be replaced.

- Outbuilding 2 (Stable/carriage building)

Internal and external alterations to include a gym, plant store and garage. The existing cage and timber partition will be removed to create a larger space that is better suited for its intended purpose. Within the current openings, glazing is proposed. Existing doors will be made good and repurposed as shutters.

- Swimming Pool

Reinstatement of the swimming pool outside Outbuilding 01, measuring approximately 15 x 6 metres.

Principle of development

Wiltshire Core Strategy Policies CP1 (Settlement Strategy) and CP2 (Delivery Strategy) set out the spatial strategy for sustainable development across Wiltshire. These policies direct new development to the most sustainable locations, primarily within the limits of development of market towns, local service centres, and large villages. Proposals outside these limits are generally only supported in exceptional circumstances.

The principle of domestic extensions and alterations within the curtilage of existing dwellings is considered acceptable, providing those proposals are compliant with the requirements of relevant policies within the development plan. These matters are addressed further below.

Development within the Green Belt

There is no relevant local development plan policy on Green Belt and as such the NPPF, Section 13 is the only policy consideration on this matter. This sets out a negative planning approach and is one of the most restrictive planning policies in England. It sets out that development, except for specific exclusions at paragraphs 154 and 155 of the NPPF, is inappropriate. It explains that development should not harm the defining characteristic of the Green Belt which is its openness.

Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The NPPF confirms that 'very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

National policies indicate, amongst other things, that applications for residential extensions in such locations should be strictly controlled and not be disproportionate to the host building. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open with key purpose being to assist in safeguarding the countryside from encroachment.

Paragraph 154 to the NPPF confirms that new development in the Green Belt is inappropriate unless specified in a series of exceptions. Exception (c) requires that an extension or alteration of a building will not be inappropriate provided that it does not result in a disproportionate addition over and above the size of the original building. Use of the term "original building" is defined within annexe 2 to the NPPF as:

'Original building: A building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.'

The application has been submitted with a very detailed historical assessment which include colour coded phasing diagrams. The phasing diagrams included in the historic report (page 23) demonstrate the changes over time in relation to changes but doesn't strictly include green belt references or volume calculations. Volume calculations have not been advanced at this stage. Irrespective, an assessment of a development's proportionality is not simply confined to a mathematical calculation and for this reason, the submission of such information with a future planning application will be unlikely to be determinative.

The works to the dwelling are predominantly internal changes, which from the information submitted appears not to extend the footprint of the existing dwelling and would not be considered disproportionate at this stage. The proposal does include the reintroduction of a swimming pool and alterations to the to create small pitched roof to one of the outbuildings.

Considering the wider curtilage changes have been made to the site, which the historic report acknowledges that across the site, there has been extensive rebuilding, with various farm structures and outbuildings constructed and demolished over time. Taking this into account, there are officer concerns that the reintroduction of the swimming pool could represent development at the upper end of what could reasonably be considered proportionate to the scale and character of the original dwelling when assessed against the site history. Paragraph 154 to the NPPF confirms that new development in the Green Belt is inappropriate unless specified in a series of exceptions. Exception (h) requires that other forms of development maybe permitted provided they preserve the Green Belts openness and do not conflict with the purposes of including land within it. Applicable to this application is exception (h) ii. engineering operations.

In summary, the reintroduction of a swimming pool may be considered inappropriate, any formal application should clearly demonstrate the proposed works are not disproportionate to the original dwelling and don't harm the openness of the Green Belt. It would be advisable to include an overt identification of what constitutes the "original building" as per the description in annexe 2 of the NPPF with any future application. Additionally, the application should address potential cumulative impacts of previous extensions or alterations, as these will be material considerations when assessing whether the proposal remains proportionate.

Heritage, Design and Impact upon the character and context of the area

From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Section 66 requires that special regard be given to the desirability of preserving listed buildings, their settings or any features of special architectural or historic interest which they possess. Section 72(1) of the Act requires the Council to pay special attention to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.

The Council's Core Strategy Policy CP58 'Ensuring the conservation of the historic environment' requires that designated and non-designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance and encourages proposals which improve the condition of heritage assets at risk.

The Council's Core Strategy CP57: Ensuring high quality design requires a high quality of design in all new developments. The policy requires applicants to "demonstrate how the proposal will make a positive contribution to the character of Wiltshire through (amongst other things) responding to the value of the natural and historic environment and being sympathetic to and conserving historic buildings and landscapes. Development is required to respond positively to the existing in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting.

The NPPF outlines government policy for planning. Chapter 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development.

Policy CP57 of the WCS seeks to ensure that all development proposals are of a high standard of design that responds positively to the local context and contributes to a sense of place. This includes consideration of layout, form, materials, scale, and relationship to the surroundings. Proposals should reinforce local distinctiveness, protect the character of settlements, and promote inclusive and attractive environments.

This preapplication is seeking to make alterations, which has been submitted in four main components:

1. *Alterations to the Main dwelling*
2. *Outbuilding 1 - Internal and external alterations will provide a pool house. Timber lean-to shack on the north-western side of the building will be replaced.*
3. *Outbuilding 2 - Internal and external alterations to include a gym, plant store and garage*
4. *Reinstatement of Swimming Pool – approx. 15m x 6m*

The proposed works and alterations to the main dwelling appear, at this stage, to be appropriate and well considered. References are made to the existing internal partitions being of modern construction; however, it is not entirely clear whether any historic fabric would be lost. In conjunction with the removal of ceilings and the installation of a new bathroom, a clear schedule of works and detailed method statement should be provided to confirm that no historic fabric will be affected or removed. Full joinery details should be submitted for any new partitions, including materials, profiles, and finishes, to ensure that the design is sympathetic to the internal character of the building. In addition, detailed information on how the existing doorway is to be sealed off should be provided with any future application. These details must clearly demonstrate whether the proposed works would be reversible or not, thereby safeguarding the potential for reinstatement in the future and minimising any permanent impact on the historic fabric.

In the absence of any initial adverse comments from the Conservation Officer, the proposal is considered to have a neutral impact upon the identified heritage assets and, at this stage, would not appear to unduly harm the character or significance of the listed building. This assessment is based on the information currently available and assumes that no historic fabric will be removed or significantly altered. However, this conclusion may change should further details indicate that elements of historic significance are affected as part of the proposed works. To ensure clarity, a detailed schedule of works and method statement should be provided prior to commencement, confirming the extent of any interventions and demonstrating how the historic fabric will be preserved.

The conversion of the outbuildings appears to be sympathetic, but without further detailed plans it not possible to give definitive answer at this stage. Works appear to remove internal modern partitions to create internal habitable space ancillary to the main dwelling. Works to the roof appear to be proportionate. Further details and proposed materials would need to be submitted in order to give a clear and concise answer. Material palettes would be expected to consider the very sensitive historic and architectural sensitivities of the site.

Amenity

Core Policy 57 states that development should have regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants and ensuring that appropriate levels of amenity are achievable within the development itself. Section 12 of the NPPF also states that planning decisions should create places with a high standard of amenity for existing and future users.

From the plans and location of the dwelling appears to be at sufficient distance from any immediate neighbours to mitigate any direct or unacceptable impact to amenities enjoyed by neighbouring properties. The nearest neighbouring property Briary Orchard is located approximately 122m to the northwest and Barn House located circa 135m to the east. Any future application should demonstrate that proposals must achieve appropriate levels of amenity within the development itself, including the consideration of privacy and overshadowing to immediate neighbours. In order to gain a favourable outcome at full planning stage, any future submission should demonstrate that any potential for loss of light and privacy would not be significant and would not cause harm to neighbour amenity. If there is an unlikely or insignificant impact this should be clearly demonstrated within any future proposal.

Whilst some consultations may have taken place on this preliminary enquiry, as part of the process if a planning application was submitted it would also require full consultation with the neighbouring properties and any other interested party. It is always difficult to gauge reaction to applications, but other issues may be raised that were not considered as part of this pre-application process.

Ecology and biodiversity

Policy CP50 seeks to conserve and enhance biodiversity across Wiltshire. Development should avoid harm to protected species and habitats, and provide net gains in biodiversity wherever possible. The Council has a statutory duty under the Environment Act 2021 to secure 10% measurable biodiversity net gain (BNG).

The site lies within a consultation zone for Bechstein Bats, and core roost buffers associated with the Bath and Bradford-on-Avon Bats SAC and further ecological sensitivities therefore, the proposals have potential to result in adverse impacts on the special features of that site and the wider area. An ecologist has been consulted on this application, with comprehensive comments included in this report. The ecologist provided a thorough response which would need to be addressed in any future submission.

Biodiversity Net Gain

Any formal application would be subject to the effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990, which outlines that planning permission granted for development of land in England is deemed to have been granted subject to the condition (biodiversity gain condition). There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition may not always apply.

Biodiversity Net Gain is mandatory from 12th February 2024 (Major sites) and 2nd April 2024 (minor sites). Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) applications are required to deliver 10% Biodiversity Net Gain (BNG).

Any small scale (non major) or major scheme that you may decide to pursue on this site will therefore need to demonstrate that no net loss and a minimum of 10% net gain in biodiversity on the site is to be provided, in line with the requirements of the NPPF, WCS policy CP50 (Biodiversity and Geodiversity) and the Environment Act.

Details of the current baseline (using UK Habitats Classification) and a demonstration of the net gain calculation, using the current version of the metric and presented as unlocked spreadsheets, will be required in support of your application. Please see this link for further information: Understanding biodiversity net gain - GOV.UK (www.gov.uk).

In line with NPPF and with CP50, applications that do not fall into the category where BNG is required, must still ensure that no net loss of functional habitat for the benefit of wildlife in the local area will occur as a result of the proposed development. In addition, it is expected that gains for

biodiversity, relevant to local habitats and wildlife populations will form part of the proposed development.

Landscape

The site is wholly contained within the Cotswolds National Landscape (formerly Cotswolds AONB). Core Policy 51 of the WCS and Policy CE1 the Cotswolds National Landscape Management Plan 2025-2030 seek to ensure that the landscape character, scenic quality and geological features of the Cotswolds National Landscape (CNL) are conserved, and where possible enhanced. Core Policy 57 requires that all new developments including extensions, alterations, and changes of use of existing buildings relate well to the wider area. Development is expected to create a strong sense of place through drawing on local context and being complementary to the locality, as such any subsequent application will need to demonstrate that the design and the materials do relate well to the surrounding area.

As a result of the proposal's location within the CNL, due consideration is given to the potential impact the proposal will have upon the landscape and scenic beauty of the National Landscape. The dwelling occupies a relatively large footprint and the overall works would sit against the main envelope of the dwelling and would largely be read within the context of the host dwelling. Which is well screened by mature hedging and vegetation. Subject to the alterations being constructed in high quality natural materials it is unlikely to appear significantly prominent. As a result, any visual impact upon the wider landscape is likely to be minimal. Any formal planning application should have regard for landscape impacts.

Archaeology

Planning records indicate that the site is in an archaeologically sensitive location. The archaeology officer has been consulted on the proposal and has raised no objections or requirements for a site assessment and there is no reason to conclude otherwise.

Drainage

Coles Farm, located in Alcombe near Corsham, lies within Flood Zone 1, indicating a low probability of fluvial flooding from rivers or the sea. However, this designation does not eliminate the potential for surface water flooding, which can occur due to heavy rainfall, poor drainage, or runoff from surrounding higher ground. The site is situated on sloping terrain overlooking the Bybrook Valley, which may contribute to increased runoff velocity and concentration during storm events. While no mapped watercourses are immediately adjacent to the property, the rural setting and historic agricultural use suggest the possible presence of informal drainage channels or culverted flows that could influence local hydrology. The Environment Agency's long term flood risk mapping and Wiltshire Council's Strategic Flood Risk Assessment should be consulted to confirm any susceptibility to surface water accumulation, particularly in garden areas or near historic outbuildings.

The drainage engineer has been consulted on this application and a comprehensive response has been submitted in response to the application, which will be forwarded under separate cover and accompany this report. The drainage engineer provides support in principle, subject to the recommendations outlined in their response. At this stage, subject to further information supporting any future applications, the proposals are broadly acceptable from a flood risk and drainage perspective. Further detail will be required at full application stage to ensure compliance with national and local policy.

Highway safety and parking

Policies CP60 to CP64 set the transport and accessibility framework for development in Wiltshire. Proposals must provide safe and suitable access for all users and should not have a severe impact on

the transport network. Adequate parking, turning space, cycle storage, and accessibility for waste collection should be incorporated in line with Wiltshire's adopted car parking strategy.

From the information submitted the proposal is not seeking to increase the bedroom capacity and no plans or references to changing the existing access to the dwellinghouse have been advanced. Any future proposal would need to clarify that no changes are being made to bedroom quantum's or access/parking arrangements for Coles Farm.

Supporting Information Required for Future Application

When preparing to submit a planning application, it is important to ensure that all the necessary plans, documents, and supporting information are included to meet both national and local validation requirements. Failure to provide the required information may result in delays or your application being declared invalid.

Wiltshire Council has adopted local validation checklists which set out the supporting documents required for different types of development, in addition to those set out by national guidance. You can access both the National Requirements and Wiltshire Council's Local Validation Checklists here: [Apply for planning permission - Wiltshire Council](#)

We recommend you review consultee responses included in this report the relevant checklist for your proposal type and use it as a guide when preparing your submission.

Procedural Advice and Consultation Expectations

Applicants should be advised of the Council's procedures for submitting a planning application, including relevant validation requirements and public consultation processes. For major proposals — particularly residential development — it is strongly recommended that applicants engage early with key stakeholders, including:

- The relevant Town or Parish Council
- The local Division Member
- Local residents, where appropriate, via public engagement or community events

Early engagement can help to identify and resolve issues at an early stage, potentially improving outcomes and reducing delays during the formal application process.

Advice regarding Building Regulations

It is likely that your proposal will require separate approval under the Building Regulations. The Surveyor who deals with your area can be contacted on 0300 456 0113. They are happy to provide you with free Building Regulation advice on this proposal and discuss this project further. This will help to ensure that the final decisions are compliant with the Building Regulations and may help save you time and money.

Closing Summary

When assessed against the Development Plan and the significant material consideration of Green Belt policy set out in the NPPF, it is possible that modest alterations could be supported at Coles Farm subject to the assessment of appropriate scaled drawings and volume calculations and its previous site history. However, it is strongly recommended that an exploration of what the "original building" might

constitute is identified so as to assist the decision-making process. Any new walls, terracing and hard landscaping would likely be considered as alterations to the dwelling and must not be disproportionate to the original building. The swimming pool will require further consideration and justification.

Any subsequent application should include a full set of plans and elevations showing the proposed property drawn to an appropriate scale, these plans will need to be accompanied with red/blue line boundary site plan. To be weighed in that balance will be the site-specific impacts of development and any harm arising and proportionate assessments in relation to the heritage, ecological and landscape sensitivities of the site should accompany any future application. These matters are addressed in more detail in this opinion as far as is possible based upon the information available at this time.

This advice is offered in good faith based on current policy and guidance. While it provides a helpful steer, it cannot prejudice the outcome of any future planning application. Please ensure that any submission is fully supported by the required information and that material considerations identified above are addressed.

Should you require further assistance, please do not hesitate to contact us.

Yours faithfully

Head of Development Management

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