

APPLICATION FOR FULL PLANNING PERMISSION CASE OFFICER REPORT

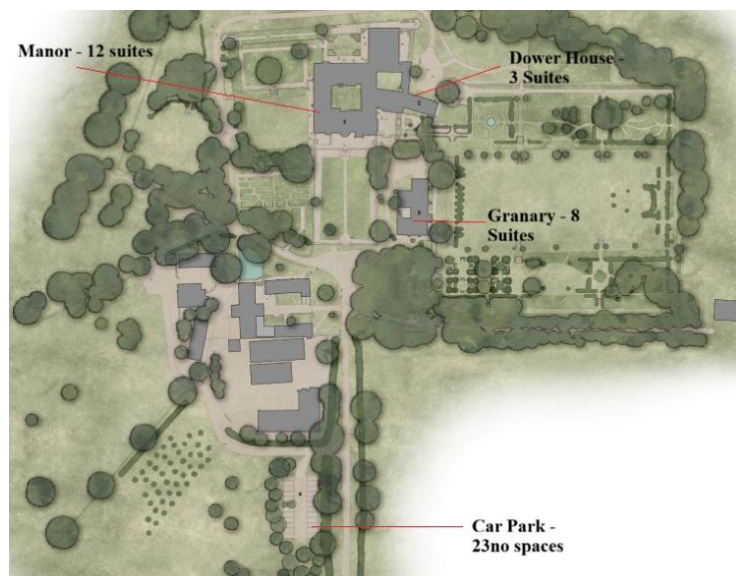
APPLICATION REFERENCE:	PL/2026/00168
APPLICATION TYPE:	Full planning permission
SITE ADDRESS:	Hazelbury Manor, Bradford Road, Hawthorn, Corsham, SN13 8HX
DEVELOPMENT DESCRIPTION:	Change of use of Hazelbury Manor (Grade I listed), Dower House (Grade I listed) and The Granary (Grade II listed) from mixed used, residential (C3) and agricultural, to hotel use (C1) with ancillary parking.
RECOMMENDATION:	Approve

PROPOSAL

The application seeks planning permission for the change of use of Hazelbury Manor (Grade I listed), the Dower House (Grade I listed) and The Granary (Grade II listed) from a mix of residential (Use Class C3) and agricultural uses to a hotel use (Use Class C1).

The application site comprises a collection of historic buildings set within extensive grounds, including a Registered Park and Garden (Grade II registered), located within the Cotswolds National Landscape and the Bath and West Wilts Green Belt.

The current use of the principal buildings is residential, with associated ancillary agricultural buildings and estate-related uses across the wider landholding. The proposal seeks to establish the principle of a hotel use across the main buildings, forming the first stage in a phased approach to securing a long-term viable use for the site. It is intended that there would be 12no hotel suites within the Manor House, 3no within the Dower House, and 8no within The Granary. Below is an extract from the submitted proposed site plan, which has been annotated by the case officer to highlight the car park and pertinent buildings:



The description of development also refers to the provision of ancillary parking (23no spaces) associated with the proposed hotel use. However, the application does not include detailed proposals for the design, layout, surfacing, landscaping or lighting of any parking areas. These matters are intended to be addressed as part of subsequent full planning and listed building consent applications.

Access to the site is currently achieved via established access points connecting to Bradford Road by way of existing estate tracks, which in part coincide with Public Rights of Way including Bridleway BOX51 and Footpath BOX54. The proposal does not include the creation of new access points or physical alterations to the existing access routes, but indicates that a one-way circulation system would be implemented utilising the existing internal track network – specifically ingress via BOX54, egress via BOX51.

No physical alterations to the buildings, or detailed operational or layout changes, are proposed as part of the current submission. The application is therefore limited to consideration of the principle of the change of use only, with detailed works required to facilitate the hotel use to be brought forward separately. That said, proposed plans have been submitted which suggest how the hotel suites will be arranged, and also demonstrate that the existing layout and accommodation (in particular the number and arrangement of bathrooms on the upper floors of the Manor House) would not need significant alteration to provide the desired number of suites.

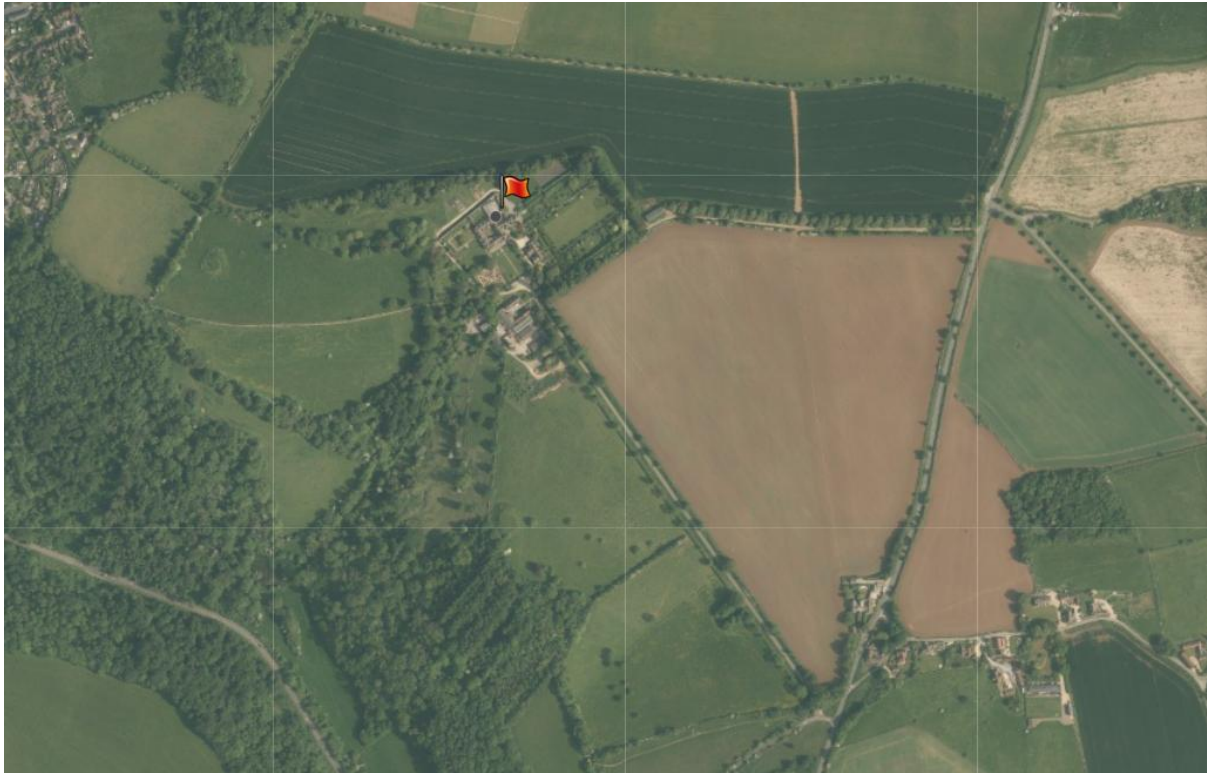
Supporting information submitted with the application, including a Use Options Appraisal, indicates that a range of alternative uses have been considered for the site. These include continued use as a single dwelling, subdivision into multiple residential units, institutional uses, office use and educational use. The submitted appraisal concludes that hotel use represents the most appropriate option to secure the long-term conservation and viable use of the heritage assets. The Manor was on the open market for 3 years before being purchased by the applicant.

Whilst the LPA was not engaged in any pre-application discussions for this change of use application, Historic England was. The submitted planning statement advises that this pre application engagement has informed the proposals, ensuring that all development principles are underpinned by best practise in heritage management.

This application seeks approval in principle with the detailed planning and listed building consent applications to follow. The applicant advises that the rationale for this application process is to first secure the acceptance in principle of the proposed use, which will in turn aid securing the necessary substantial investment required to advance the relevant applications and related design process and so deliver the development.

SITE DESCRIPTION

The application site relates to Hazelbury Manor, located east of the village of Box in Wiltshire. The site comprises a historic estate set within extensive grounds of approximately 175 acres. The aerial photograph below (Hazelbury Manor indicated by red flag) illustrates the bucolic context.



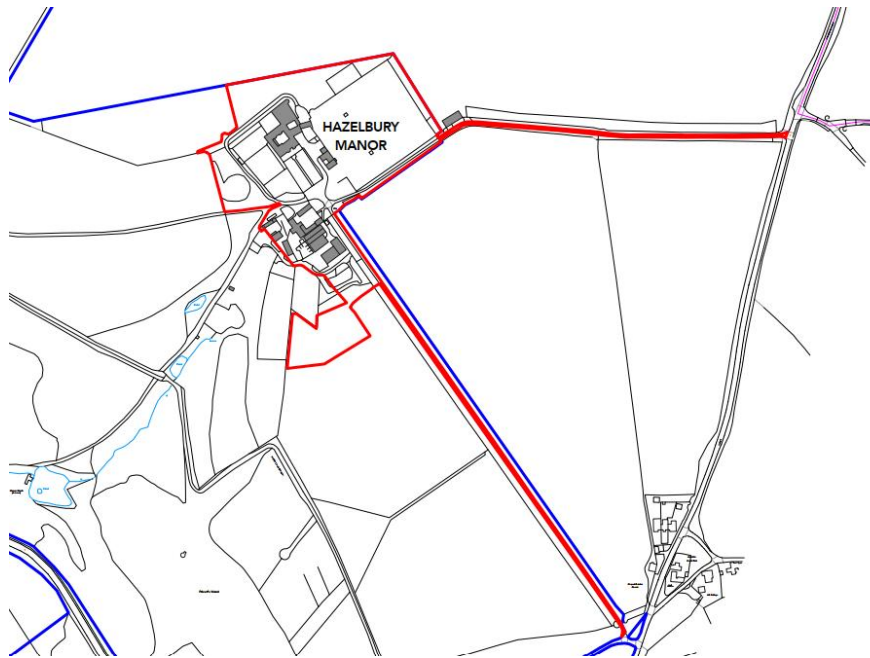
Hazelbury Manor is a Grade I listed building, accompanied by a number of associated buildings and structures, many of which are also listed, and together forming a significant historic estate. The principal buildings within the site include Hazelbury Manor and the Dower House (both Grade I listed), together with The Granary (Grade II listed), alongside other structures including a tithe barn, stables, entrance gates, coach house, agricultural buildings, glasshouses and formal gardens. The site is set within a Grade II Registered Park and Garden, which forms part of the wider estate and contributes to the significance of the heritage assets.

The Manor itself has a long and complex history, with origins dating from at least the 14th century and substantial development occurring between the 15th and 17th centuries. The building was restored and extended in the 1920s by Sir Harold Brakspear and subsequently operated as a girls' school between 1943 and 1971 before returning to private residential use. The Dower House is physically linked to the Manor.

The Granary lies to the east of the main walled garden and has historically been used in part for residential purposes, currently comprising two residential units with associated structures.

Access to the site is primarily via an existing driveway from the B3109 Bradford Road to the southeast, with a secondary access route connecting back to Bradford Road to the east. The wider estate includes areas of agricultural land and parkland, through which a number of public rights of way pass, including bridleways and footpaths.

The estate extends beyond the application site boundary. The extract of the submitted location plan below indicates the extent of the application site (red line):



It should be noted that during the life of the application it was confirmed by the applicant that, contrary to the information on the application form, notice of this application has been given to the landowner for PROW BOX51 (extending to the east from the Manor to Bradford Road).

CONSTRAINTS

The application site is subject to a number of significant planning designations and constraints, which are material to the consideration of the proposal.

Heritage

- Hazelbury Manor and the Dower House are Grade I listed buildings
- The Granary is Grade II listed
- A number of additional structures within the site are also Grade II listed
- The site is located within a Grade II Registered Park and Garden

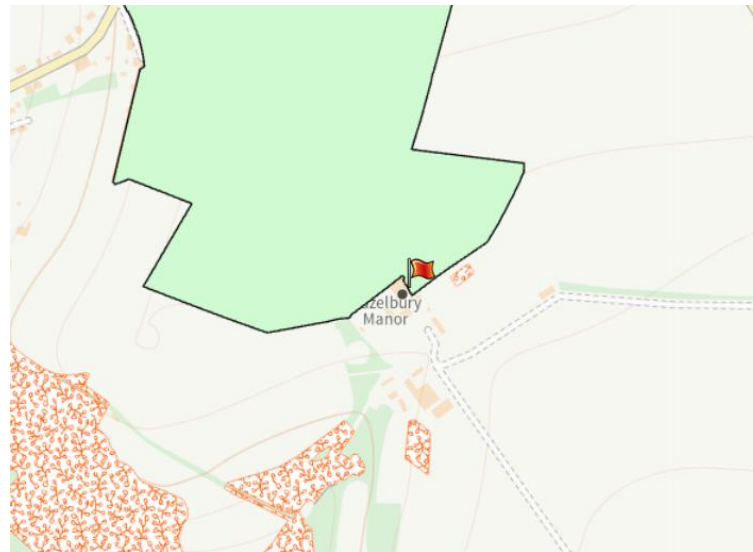
Landscape and Designation

- The entire site lies within the Cotswolds National Landscape (formerly AONB)
- The site is located outside, but in proximity to, the Box Conservation Area
- The site is located within the Green Belt

Ecology

- The site lies within the Bath and Bradford-on-Avon Bats SAC consultation zone
- The site is affected by:
 - Greater Horseshoe Bat 4km buffer
 - Greater Horseshoe Bat core roost buffer
 - Lesser Horseshoe Bat 2km buffer
- Areas of priority habitat, including traditional orchard, are nearby.
- The Box Mine SSSI lies in close proximity to the site, immediately to the north of the built area of the Manor

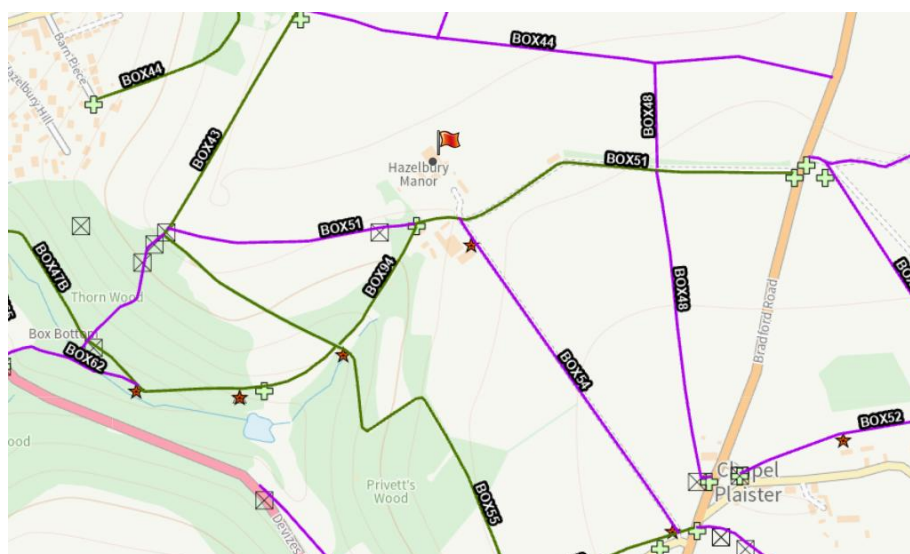
The green wash on the plan below shows the SSSI. The orange pattern shows Natural England priority habitat:



Access and Public Rights of Way

- A number of public rights of way cross the site, including:
 - Bridleway BOX51
 - Footpath BOX54
- These routes form part of the internal estate access network and are used by pedestrians, equestrians and other users

The image below shows the network of PROW on and around the site – Hazelbury Manor being identified by the red flag. *(For information, red stars on the snip below indicate gates and green crosses indicate signage; green lines are bridleways and purple line show footpaths. X denotes the presence of a stile – either stone or wood).*



Flood Risk

- The site is located within Flood Zone 1 (low risk of flooding)
- There are localised areas of surface water flood risk (less than 150mm) to the east of The Granary.
- The Council's SFRA indicates that groundwater levels are at least 5m below the ground surface, and as such flooding from groundwater is not likely.

Other

- There are no Tree Preservation Orders identified across the site, and it is not in a conservation area.
- The site lies outside any defined settlement boundary and is therefore located within the open countryside for the purposes of planning.

PLANNING HISTORY

A review of the Council's records indicates that the site has an extensive but largely historic planning history, primarily relating to repairs, alterations and ancillary development associated with the residential use of the estate. There is no recent planning history relating to alternative commercial or tourism uses.

Recent planning history of most relevance is summarised below:

Application Ref	Proposal	Decision / Date
N/98/00041/AGN	Erection of canopy to livestock building	Approved (04/02/1998)
N/97/02818/DOC	Discharge of condition – wall copings details	Approved (24/03/1998)
N/97/00796/FUL	Erection of gate, stile and cattle grid	Approved (13/06/1997)
N/96/01151/FUL	Erection of agricultural building	Approved (05/08/1996)
N/96/00631/FUL / N/96/00632/LBC	Alterations to walls, gates and landscaping works	Approved (13/05/1996)
N/95/01868/LBC	Alterations and repairs to coach house	Approved (27/11/1995)
N/95/00450/LBC	Alterations including swimming pool works	Approved (06/06/1995)
N/94/00204/FUL / N/94/00205/LBC	Conversion of Granary to residential units	Approved (18/03/1994)
N/92/00835/FUL / N/92/00834/LBC	Change of use of barn to storage with associated works	Approved (12/06/1992)

RELEVANT LEGISLATION, POLICIES AND GUIDANCE

Planning (Listed Building and Conservation Areas) Act 1990
Planning and Compulsory Purchase Act 2004

National Planning Policy:

- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)
- National Design Guide

Development Plan:

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 application 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 11 Spatial Strategy Corsham Community Area
- Core Policy 39 Tourist Development
- Core Policy 40 Hotels B&Bs Guest Houses and Conference Facilities
- Core Policy 48 Supporting Rural Life
- 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 61 Transport & Development
- Core Policy 64 Demand Management

Draft Wiltshire Local Plan Policies

At Full Council on 19 May 2026, the elected members of Wiltshire Council agreed to withdraw the emerging Wiltshire Local Plan. The said Plan has no material weight for the purposes of the application.

In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2026, on 30th June 2026 Wiltshire Council published a notice of intention to prepare a new local plan for Wiltshire. The next stage is a Scoping Consultation which commences on 2nd September 2026. This plan is at a very early stage and currently carries no weight for decision making.

There is no Box Neighbourhood Plan at the time of writing.

Supplementary Planning Documents and other Guidance:

- Wiltshire Design Guide (adopted April 2024)
- Wiltshire Local Transport Plan 2011-2026, adopted 2015 - including the Car Parking Strategy and Cycling Strategy, adopted 2015

ISSUES

The main issues that need to be addressed in this case include:

- Whether the development is acceptable in principle (CP 1 and 2)
- Whether the scheme constitutes high quality design (CP 57)
- Whether the scheme would have an acceptable impact upon the reasonable living conditions of the adjoining occupants (CP 57)
- Whether the scheme would preserve or enhance the historic environment (CP 58)
- Whether the scheme would have an acceptable landscape impact (CP 51)
- Whether the scheme would have an acceptable impact upon the Green Belt (NPPF section 13 “Protecting Green Belt Land”)
- Whether the proposal would have a negative effect upon highway safety, including if there is sufficient parking for the proposed development (CP 61 and 64)
- Whether the site can be adequately drained without increasing flood risk elsewhere (CP 67)
- Whether there would be any harmful impacts upon protected species or priority habitats (CP 50)
- Any other planning issues raised by the development

CONSULTATION RESPONSES

Box Parish Council: No objection in principle subject to conditions:

Box Parish Council raises no objection in principle, subject to a wide range of concerns being satisfactorily addressed and secured through further information, conditions and/or legal agreement. The Parish Council recognises that the proposed hotel use could help secure a viable long-term future for the historic buildings and wider estate, but considers that the application is currently lacking sufficient detail in several key areas, summarised below:-

Key concerns raised by Box Parish Council:

1. Lack of pre-application engagement and supporting evidence

The Parish Council expresses concern that no formal pre-application discussions took place, particularly given the site’s sensitivity. It also highlights a lack of clarity regarding engagement with Historic England and the absence of evidence demonstrating how the scheme has evolved or whether alternative options have been considered.

2. Need for a comprehensive Conservation Management Plan (CMP)

A central concern is the absence of a holistic assessment of the wider estate, including its:

- designated and non-designated heritage assets;
- archaeological interest;
- landscape and natural environment.

The Parish Council strongly recommends the preparation of a comprehensive Conservation Management Plan, to provide a baseline understanding of significance and guide future management and change across the estate.

3. Uncertainty regarding economic benefits and staffing

Concerns are raised regarding limited information on:

- the economic and tourism benefits of the proposal;
- the number of staff (with conflicting indications ranging from approx. 21–26 to significantly higher figures);
- how staff would travel to and from the site.

4. Transport, access and highway safety concerns

The Parish Council raises significant concerns regarding:

- the rural location and limited public transport availability;
- reliance on private vehicles;
- adequacy of parking provision, particularly for staff;
- lack of improvements to the B3109 junctions;
- the proposed one-way access system, including potential conflicts with agricultural vehicles and other users.

Further concerns relate to the use of Public Rights of Way (PROWs) as part of the access arrangement, with the potential for conflict between vehicles, pedestrians and horse riders.

5. Public access and estate management

Clarification is sought on:

- ongoing public access to the estate;
- how existing PROWs will be retained and managed;
- the potential for improvements to the PROW network.

6. Impact on heritage, trees and landscape

The Parish Council considers that:

- insufficient information is provided regarding works to listed buildings;
- trees and wider landscape features have not been adequately assessed;

- a tree survey should be undertaken and protection measures considered.

7. Ecology, lighting and environmental impacts

Concerns are raised regarding:

- impacts on ecology, including the nearby Special Area of Conservation;
- lack of detail on drainage, waste and servicing;
- absence of a lighting strategy, particularly in relation to dark skies.

8. Additional highways comments

In its supplementary response, the Parish Council maintains concerns regarding:

- underestimation of traffic movements (including staff, servicing and events);
- the safety and practicality of the proposed one-way system;
- lack of control over land required to implement mitigation measures;
- safety of the junction with the B3109.

The Parish Council considers that further work and revisions are required to demonstrate that safe and deliverable access arrangements can be achieved.

WC Highways: No objection subject to conditions:

Highways initially raised concerns regarding the proposed use of existing single-track access routes, many of which coincide with Public Rights of Way (including Bridleway BOX51 and Footpath BOX54), noting the potential for conflict between vehicles, pedestrians and equestrian users. Particular concern was expressed regarding the ability for vehicles to pass safely and the risk of reversing onto the public highway.

Whilst the submitted Transport Statement indicated that traffic generation associated with the development would be relatively low (approximately 73 two-way trips per day), the initial response concluded that further information was required to demonstrate that safe access arrangements could be achieved, including the provision of passing places and appropriate mitigation.

Following the submission of additional information, including a Technical Note, Highways confirmed that the proposed one-way circulation system would reduce the likelihood of conflicting vehicle movements along the access tracks. The low level of anticipated traffic generation was accepted and not considered to result in a material impact on the surrounding highway network.

Highways therefore raise no objection, subject to conditions. These include requirements for:

- appropriate signage on affected Public Rights of Way to highlight shared use with vehicles;
- consultation with the Rights of Way team regarding any works affecting PROWs;

- confirmation that the applicant has lawful authority for vehicular use of routes over public footpaths/bridleways.

Highways also noted that the site is not well located in terms of sustainable transport, with reliance on private vehicles likely.

WC Rights of Way: No objection subject to conditions:

The Public Rights of Way Officer raises no objection in principle to the proposed development and notes that the application presents an opportunity to enhance the Public Rights of Way (PROW) network within and around the Hazelbury Manor estate.

It is highlighted that a number of PROWs, including Footpath BOX54 and Bridleway BOX51, form part of the existing access network and are likely to experience increased vehicle use as a result of the development. Concerns are raised regarding the need to ensure these routes remain safe and accessible for walkers, equestrians and other users, including potential conflicts with vehicles.

The Officer recommends a number of measures to improve the PROW network and accessibility, including:

- removal of existing cattle grids and unnecessary gates to improve access for users;
- provision of passing places and localised widening along sections of the access routes where vehicle use is proposed;
- improvements to accessibility, including progression towards a stile-free network where possible.

Advice is also provided regarding the status of Wadswick Common, noting that separate permissions may be required for any works or structures affecting the common land.

In addition, the Officer suggests potential upgrading of certain footpaths to bridleways to improve connectivity within the wider network, although this would be subject to separate processes and consultation.

Overall, the response is supportive of the potential to improve the PROW network but highlights the need for careful management of shared use routes and further discussion regarding appropriate improvements and any necessary permissions.

WC Conservation: No objection to principle:

The Conservation Officer advises that the principle of the proposed change of use is acceptable, subject to further justification and design development. It is noted that the Manor House has already undergone some adaptation, including the provision of modern services, which would support a potential conversion to hotel use.

However, concerns are raised that the proposal is at an early stage, and that further development may be required to support the proposed use, including additional

accommodation, which could impact upon the setting and significance of the listed buildings. At present, the scope and form of such works remain unclear.

The proposed location of the car park is considered acceptable in principle, subject to the submission of appropriate landscape mitigation measures.

Overall, the Conservation Officer considers the application to be premature, noting that further discussion with the Local Planning Authority and Historic England is required to develop the proposals. It is recommended that further work is undertaken through ongoing engagement, including the use of the pre-application process.

Historic England (Ancient Monuments): No objection.

Historic England have provided detailed advice on the significance of the heritage assets and the impact of the proposals. They confirm that Hazelbury Manor and the Dower House (Grade I listed) are of exceptional significance, particularly for their 14th–17th century fabric and the c.1500 great hall, with later 1920s alterations by Sir Harold Brakspear also contributing to their historic interest. The Granary (Grade II listed) is also noted to be of significance for its 17th century fabric and group value within the estate setting.

The Registered Park and Garden (Grade II) is highlighted as an important historic landscape, with formal gardens, historic approaches and a wider rural setting that contributes to the significance of the heritage assets.

Historic England advise that the proposed change of use to a hotel is acceptable in principle, noting that the buildings have clear potential to accommodate such a use and that it could represent an optimum viable use securing their long-term conservation.

In respect of the proposed car park, Historic England consider that it is likely to have a low level of impact on the significance and setting of the heritage assets, due to existing screening and its location within the wider estate. They note that further landscape mitigation would be beneficial and could be secured by condition.

However, Historic England advise that a listed building consent application is required and that further detailed information will be necessary to assess the impact of internal alterations, including partitions, doors and fittings. They recommend that a Heritage Impact Assessment is expanded to provide clear justification of proposed works in accordance with Section 20 of the NPPF.

They also recommend the preparation of a Conservation Management Plan to guide the long-term management and future development of the estate.

Overall, Historic England raise no objection in principle to the proposed development, recommending that further detail and safeguards are secured to ensure compliance with national policy and the statutory duty to preserve heritage assets and their setting.

WC Archaeology: No objection subject to conditions:

The Archaeology Officer advises that the proposed ancillary parking area lies within an area of archaeological potential, with aerial photography identifying cropmarks indicative of possible archaeological features.

They recommend that an archaeological trial trench evaluation is undertaken to establish the significance of any remains within the site. This should focus on the area of the proposed car park and be secured by condition.

It is noted that this evaluation would form the first stage of potential mitigation, and that further archaeological investigation and recording may be required depending on the results.

The Archaeology Officer therefore raises no objection, subject to the imposition of a condition requiring a programme of archaeological investigation to be carried out in accordance with approved details and relevant professional standards.

WC Public Protection: No objection subject to conditions:

The Environmental Health Officer notes the potential for impacts on nearby residential receptors and recommends conditions to control noise, odour and general amenity impacts, particularly in relation to:

- noise from plant and mechanical equipment;
- odour and emissions from kitchen extraction systems.

It is also noted that the details of any events or functions (e.g. weddings) associated with the hotel have not been provided. Further information may therefore be required, including the potential need for a noise assessment, depending on the nature and scale of such activities.

Conditions are recommended requiring:

- a noise impact assessment and appropriate mitigation measures for plant and equipment;
- the submission and approval of a scheme for kitchen extraction and odour control prior to operation.

WC Ecology: No objection subject to conditions

The Council's Ecology Officer initially advised that the submitted Preliminary Ecological Appraisal (PEA) was incomplete, noting that the report had been prepared prior to finalisation of the development proposals and that further survey work and ecological assessment were required to enable a full assessment of impacts. In particular, insufficient information was available to assess potential effects on the Bath and Bradford on Avon Bats Special Area of Conservation (SAC), which overlaps with part of the site.

Following the submission of additional ecological information, including bat survey data, an Ecological Impact Assessment and supporting Habitats Regulations Assessment material, the Council's Ecology Officer reviewed the additional information and undertook an Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017.

The Ecology Officer concluded that the proposal has the potential to give rise to indirect effects on bat populations associated with the Bath and Bradford on Avon Bats SAC, principally through increased visitor activity, lighting and construction-related disturbance. However, subject to appropriate mitigation and management measures being secured, these effects can be avoided or adequately mitigated.

The Ecology Officer's Appropriate Assessment concludes that the proposal would not result in an adverse effect on the integrity of the Bath and Bradford on Avon Bats SAC, either alone or in combination with other plans and projects, subject to the implementation of appropriate mitigation measures and planning conditions.

The Ecology Officer recommends conditions requiring, amongst other matters:

- a Construction Environmental Management Plan (CEMP);
- a Landscape and Ecological Management Plan (LEMP);
- ecological mitigation measures;
- controls over lighting;
- measures to manage visitor impacts on sensitive ecological receptors.

The Ecology Officer also confirmed that Biodiversity Net Gain is not considered to apply to the proposal on the basis that the application relates solely to the change of use of existing buildings and does not involve operational development resulting in a loss of habitat requiring Biodiversity Net Gain assessment.

The Ecology Officer therefore raises no objection to the proposal subject to conditions.

Natural England: No objection subject to conditions

Natural England initially raised concerns regarding the potential effects of the proposal on the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC), requiring further ecological information and assessment under the Habitats Regulations.

Following submission of additional survey information, preparation of a shadow Habitats Regulations Assessment and the Council's subsequent Appropriate Assessment, Natural England has reviewed the information and confirms that it has no objection subject to conditions. Natural England notes that the proposal has the potential to affect bat populations associated with the SAC, however is satisfied that, subject to the mitigation measures identified within the Appropriate Assessment being secured by condition, the proposal will not adversely affect the integrity of the SAC.

Natural England recommends conditions relating to:

- implementation of ecological mitigation measures;
- a Construction Environmental Management Plan (CEMP);
- a Landscape and Ecological Management Plan (LEMP);
- a Visitor Management Plan;
- controls relating to lighting design and future lighting proposals. Natural England also notes that additional bat activity surveys are ongoing and requests consultation on the

final survey results and any future lighting strategy submitted in connection with the site.

WC Drainage: No objection subject to conditions:

The submitted Flood Risk Assessment (FRA) confirms that the site lies within Flood Zone 1 and is therefore at low risk of fluvial flooding. The site is also identified as being at low risk from groundwater flooding, with limited historic sewer flooding incidents recorded in the surrounding area.

The proposal involves no increase in built footprint and only minor additional impermeable surfacing, with a new car park proposed to be constructed using permeable materials, and existing drainage arrangements to be retained where possible with the incorporation of Sustainable Drainage Systems (SuDS).

However, insufficient information has been provided regarding the existing and proposed drainage strategy. The Drainage Officer therefore requires further details to ensure that surface water discharge rates will not increase as a result of the development.

Conditions are recommended requiring:

- submission of a detailed surface water drainage strategy prior to commencement, including confirmation of existing drainage arrangements, any proposed alterations, and pre- and post-development discharge rates;
- details of the implementation, long-term management and maintenance of the sustainable drainage system prior to occupation.

Cotswold National Landscape: No objection subject to conditions:

The Cotswolds National Landscape Board initially raised a holding objection to the application on the basis that insufficient information had been submitted to assess the proposal's impact on landscape character, visual amenity, and dark skies.

In particular, the original submission lacked a robust assessment of landscape and visual impacts, including an absence of a Landscape and Visual Impact Assessment (LVIA) or equivalent appraisal, and insufficient information regarding external lighting. As such, the Board concluded that it had not been demonstrated that the proposal would conserve and enhance the natural beauty of the Cotswolds National Landscape, nor that it would meet the statutory duty to "seek to further" this purpose.

Following the submission of additional information, including a landscape assessment, the Board reviewed the updated material and confirmed that the principle of the proposed change of use is supported, recognising that hotel use represents an appropriate and viable option to secure the long-term conservation of the Manor and its grounds.

The Board accepts the conclusions of the submitted landscape assessment, which indicate that the proposed development would give rise to low levels of visual impact, with mitigation and landscaping capable of further reducing effects over time. In the longer term, the development is anticipated to result in neutral or beneficial effects on the landscape setting. However, the Board notes that detailed landscaping proposals and lighting details have not yet been provided. It therefore recommends that, should planning permission be granted, conditions are imposed requiring:

- submission of a comprehensive landscaping scheme, including mitigation and enhancement measures;
- a long-term landscape and ecological management plan; and
- a detailed external lighting scheme to protect dark skies.

Subject to the imposition of these conditions, the Board confirms that it would withdraw its holding objection.

The Gardens Trust: No objections

The Gardens Trust confirms that Hazelbury Manor is a Grade II Registered Park and Garden and therefore of recognised historic significance. The Trust welcomes the quality of the submitted Heritage Statement and supporting documents, including the detailed setting study relating to the proposed car park. The Gardens Trust initially expressed concerns regarding the absence of a comprehensive Conservation Management Plan (CMP) and the need for further consideration of wider historic landscape features beyond the Registered Park and Garden. However, following a site visit and further discussions with the applicant, the Trust confirms that it is comfortable with the proposals and raises no objection to the application.

The Trust comments on a number of twentieth-century landscape features associated with former owner and architect Ian Pollard, including the prospect mounds, stone circle, topiary and historic water features. Whilst acknowledging that some of these features contribute to the character and interest of the wider estate, the Trust notes that:

- the topiary within the formal gardens remains extant;
- water features, ponds and watercourses are currently being sensitively restored and improved;
- the prospect mounds have some value as viewing features within the landscape;
- the stone circle has no direct visual or functional relationship with the Manor, formal gardens or wider Registered Park and Garden;
- the former Yew Henge was removed approximately 25 years ago and therefore no longer forms part of the estate.

The Trust concludes that, in the absence of evidence of a coherent historic landscape plan associated with these twentieth-century interventions, and given that the current application would not directly affect any of these features, it has no concerns regarding them at this stage.

The Trust continues to support the preparation of a Conservation Management Plan to guide the long-term stewardship of the estate. However, it does not consider that the scale of change

proposed under the current application requires such a document to be prepared prior to determination.

Overall, the Trust considers that the proposal presents an opportunity to secure a sustainable future for the wider historic estate and welcomes the careful and sensitive approach being taken towards its long-term conservation and management.

Society for the Protection of Ancient Buildings (SPAB): No objection in principle/subject to information.

SPAB acknowledges that the proposed hotel use may represent a viable option to secure the long-term conservation of the site, but emphasises that robust justification is required to demonstrate that this is the optimal and least harmful use, including through an Options Appraisal. While the submitted Heritage Statement is welcomed, SPAB considers that it lacks sufficient detail regarding the impact of proposed works on the listed buildings and the wider site.

SPAB raises concerns in relation to: the lack of detailed information on alterations required to facilitate hotel use, including bathrooms, services, fire safety, thermal upgrades and accessibility works; the potential cumulative impact of multiple alterations on the historic fabric and character of the buildings; insufficient assessment of impacts on the Registered Park and Garden, noting omissions in the submitted material; and the absence of key supporting documents at this stage.

SPAB advises that the following should be provided at Listed Building Consent stage:

- Options Appraisal
- Conservation Management Plan (CMP)
- Heritage Impact Assessment (HIA)
- Condition survey and detailed schedule of works
- Full details of services, fire strategy, and fabric interventions

SPAB concludes that, subject to demonstration that hotel use is the most appropriate viable option, it raises no objection in principle.

REPRESENTATIONS

In accordance with the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), the application was publicised by way of:

- Neighbour notification letters sent to nearby properties
- Three site notices displayed on highways and public rights of way approaching the site
- An advertisement placed in the local press

These methods were used to inform interested parties. Below is a summary of the representations received during the consultation period. Only material planning considerations

have been taken into account in the assessment of this application. Non-material issues, such as property values or private legal disputes, cannot be considered in the determination process.

Support

A significant number of representations support the proposal in principle, raising the following key points:

- The proposal would secure a viable long-term use for important heritage assets, helping to prevent deterioration and ensuring continued investment in the estate
- The reuse of the buildings as a hotel is considered an appropriate and sympathetic use, given the scale and character of the Manor and associated buildings
- The scheme is seen as providing economic benefits, including:
 - job creation
 - support for local businesses
 - strengthening the local tourism offer
- The proposals are expected to result in improved management and maintenance of the wider estate, including landscape, ecology and public rights of way
- Support is expressed for the credentials and track record of the applicant, with confidence that the scheme would be delivered to a high standard.
- Some representations also note that bringing the estate into active use would have a positive impact on the local area, increasing activity and ensuring the continued stewardship of a prominent historic site.

Concerns and Objections

A number of representations raise concerns, which can be summarised as follows:

1. Lack of detail / need for further information

- Concern that the application seeks approval in principle without sufficient detail, particularly in the absence of a Listed Building Consent application
- Requests for additional information to enable proper assessment, including:
 - detailed design proposals
 - ecological surveys
 - transport and access information
- Concern that supporting documents (e.g. ecological information) have not been fully available for review

2. Need for a Conservation Management Plan (CMP)

- A recurring theme across several representations is the need for a comprehensive Conservation Management Plan
- It is suggested that a CMP should:
 - assess the significance of the entire estate (not just designated assets)
 - set out long-term management and stewardship proposals
 - include heritage, ecology, landscape and public access considerations
 - be informed by local knowledge and wider understanding of the estate's historic and landscape interest.

- Further comments also emphasise that CMPs are not limited to publicly funded heritage projects and can be a useful tool in a wider range of conservation contexts

3. Impact on the wider historic estate and non-designated assets

- Concern that the application focuses primarily on the principal listed buildings and does not adequately assess the wider estate
- Representations highlight the importance of features beyond the Registered Park and Garden, including:
 - landscape features created in the 20th century (e.g. stone circle, prospect mounds, Yew Henge and other designed features associated with Ian Pollard)
 - historic water features, ponds and watercourses
 - archaeological findings and potential below-ground remains
- Concern that these may represent non-designated heritage assets which require further assessment
- Further comments emphasise that the relatively modern date of some twentieth-century features does not necessarily preclude them from having heritage significance or contributing to the character and local distinctiveness of the estate.
- Specific concern is raised that the significance of the prospect mounds, stone circle, Yew Henge and associated landscape planting may have been underestimated, including their relationship with the Manor, Registered Park and Garden, public rights of way, and wider views across the estate.
- Representations also refer to historic water features, ponds and watercourses, including their potential relationship to earlier phases of the estate landscape and their possible contribution to the significance of the wider historic estate.
- Comments are also made regarding the absence of a formal local list and the role of the Historic Environment Record in identifying features of heritage interest.

4. Ecology, landscape and biodiversity

- Requests for further ecological assessment, including:
 - bat surveys
 - assessment of impacts on habitats and protected species
- Concern regarding the protection of trees, including:
 - absence of Tree Preservation Orders
 - recent tree works/felling
- Reference to the wider estate's ecological value, including:
 - woodland
 - calcareous grassland
 - ponds and water systems
- Concerns are also raised regarding the relationship between ecological features and historic landscape features, particularly watercourses, ponds and woodland management.

5. Access, highways and Public Rights of Way

- Concerns raised regarding the use of Public Rights of Way for vehicular access, including:

- potential conflict between vehicles, walkers and equestrian users
 - impact on safety and enjoyment of routes
- Requests for:
 - improved management of footpaths
 - removal of stiles and improved accessibility
- Concern that increased traffic could negatively affect the tranquillity of the estate

6. Landscape character and setting

- Concern that elements of the proposal (including the car park and increased activity) could:
 - erode the sense of rural tranquillity and isolation
 - affect views across and within the estate
- Particular concern regarding:
 - visibility of development from public vantage points
 - seasonal variation (e.g. winter views when vegetation is reduced)
 - intervisibility between the Manor, Registered Park and Garden, prospect mounds, planted avenues, tree lines and public rights of way.
- Representations also stress that twentieth-century landscape interventions may form part of the estate's layered landscape history and should be considered as part of the overall landscape and heritage assessment.

7. Miscellaneous matters

Additional issues raised include:

- Uncertainty regarding the future management of the wider estate, including farming and land use
- Queries regarding potential future development beyond the current application
- Concerns regarding drainage and sewage arrangements
- Comments on the extent of the red line boundary
- Query whether Hazelbury can be designated a Conservation Area.
- Concern regarding the absence of formal local list / Historic Environment Record recognition for some features within the wider estate.
- Concern that, if the hotel use proceeds, the gardens may become accessible only to hotel guests, with requests that some form of public access to the gardens be retained or explored.

Amenity Societies

Representations have also been received from the Open Spaces Society and the Twentieth Century Society.

The Open Spaces Society raises concerns regarding the impact of the proposed access arrangements on Public Rights of Way, in particular the use of Bridleway BOX51 as part of a one-way vehicular system. Concerns are raised regarding potential conflict between vehicles, agricultural traffic and non-vehicular users, including horse riders, and the need for appropriate safety measures such as passing bays and speed control.

The Twentieth Century Society raises no objection in principle to the proposed change of use and supports the sensitive reuse of the site. However, it emphasises the importance of properly assessing and conserving twentieth-century fabric and landscape features, including elements associated with Harold Brakspear and Ian Pollard. The Society recommends that the impact of any works on such features is clearly justified through a Heritage Impact Assessment at the Listed Building Consent stage.

These representations have been taken into account in the preparation of this report and are addressed within the relevant sections below, including highways, heritage and public rights of way.

ASSESSMENT

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

"If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise."

In accordance with this statutory requirement, this application has been assessed against the relevant policies of the Development Plan, including the Wiltshire Core Strategy (2015) and, where applicable, any made Neighbourhood Plans. Consideration has also been given to the policies of the National Planning Policy Framework (NPPF) as a material consideration in the assessment.

Principle of Development

Policy Context

Core Policies 1 and 2 of the Wiltshire Core Strategy establish the overarching spatial strategy for Wiltshire and provide the NPPF for determining whether development is appropriately located. Together, these policies seek to direct growth towards the most sustainable locations whilst protecting the intrinsic character and beauty of the countryside. The strategy prioritises development within Principal Settlements, Market Towns, Local Service Centres and larger villages, whilst development in the countryside will only be supported where it accords with specific development plan policies or where material considerations indicate otherwise.

The NPPF also contains national policies relating to the location of development. Policies S3-S5 distinguish between development within settlements and development in the countryside, support sustainable patterns of growth, and require decisions to have regard to the role and function of settlements, accessibility to services and facilities, and other site-specific considerations.

The principle of development should be assessed having regard to the Development Plan as a whole, the NPPF and all other material considerations. The weight afforded to individual policies will depend upon the nature, scale and location of the development proposed.

Assessment

The application site lies outside of any defined settlement boundary and is therefore located within the open countryside where development is strictly controlled. In accordance with Core Policies CP1 and CP2 of the Wiltshire Core Strategy, new development in such locations is generally restricted unless it can be justified under one of the specified exceptions set out at paragraph 4.25 of the Core Strategy.

In this case, the proposal seeks the re-use of existing buildings for hotel purposes (Use Class C1). Core Policy CP48 supports the conversion and re-use of rural buildings for employment, tourism, cultural and community where they satisfy the following criteria:

- i. The building(s) is/are structurally sound and capable of conversion without major rebuilding, and with only necessary extension or modification which preserves the character of the original building.
- ii. The use would not detract from the character or appearance of the landscape or settlement and would not be detrimental to the amenities of residential areas.
- iii. The building can be served by adequate access and infrastructure.
- iv. The site has reasonable access to local services.
- v. The conversion or re-use of a heritage asset would lead to its viable long term safeguarding.

Criterion (i) is satisfied. The proposal relates to the re-use of existing buildings and there is no evidence before the Council to suggest that major rebuilding would be required in order to facilitate the proposed use. Indeed, the application has been promoted on the basis that the existing layout and accommodation can largely accommodate the proposed hotel use, with detailed alterations to be considered through subsequent listed building consent applications.

Criterion (ii) is also considered capable of being satisfied. Whilst the proposal would result in increased activity when compared to the existing use, detailed assessment elsewhere in this report concludes that the proposed use would not give rise to unacceptable harm to landscape character, heritage significance or residential amenity.

Criterion (iii) is satisfied. Whilst concerns regarding access arrangements were raised during the course of the application, particularly in relation to the interaction between vehicular traffic and users of the Public Rights of Way network, the Local Highway Authority has confirmed that these matters have now been satisfactorily addressed through the proposed one-way circulation system and management measures. The Highway Authority raises no objection, subject to conditions relating to signage and consultation with the Rights of Way team where appropriate.

Criterion (iv) is only partially satisfied. The site is located in a rural location and future occupants would be reliant to a significant extent on private vehicles. However, this is inherent in the nature of the proposal and its countryside location. The hotel use is directly linked to the historic estate itself and the proposal falls to be considered in the context of Core Policies 39 and 40, which expressly contemplate tourism accommodation in rural locations.

Criterion (v) attracts very significant weight. Hazelbury Manor, the Dower House and the Granary are heritage assets of exceptional significance. The submitted Use Options Appraisal indicates that a range of alternative uses have been considered and concludes that hotel use represents the most viable route to securing the long-term conservation, maintenance and occupation of the buildings. The proposal therefore aligns closely with the objective of Core Policy 48(v) and the wider aims of national policy relating to the optimum viable use of heritage assets.

Whilst criterion (iv) is not fully satisfied due to the site's inherently rural location, the proposal is considered to comply with the overall objectives of Core Policy 48. In particular, substantial weight is given to criterion (v), namely the contribution the proposal would make towards the viable long-term safeguarding of heritage assets of the highest significance. When read alongside Core Policies 39 and 40, the proposal is considered to represent an appropriate form of rural tourism development.

Core Policy 40 supports proposals for new hotel accommodation outside defined settlements where they involve the conservation of buildings which, by reason of their architectural or historic significance, should be retained. In this case, the proposal seeks to secure a viable long-term use for a number of highly designated heritage assets, and therefore aligns with the aims of this policy.

Core Policy 39 further supports tourist development in the countryside where it is appropriately located and, where practicable, makes use of existing buildings. The proposal involves the reuse of an established historic complex and is therefore consistent with these objectives, subject to compliance with other relevant policies of the development plan.

The proposal involves the re-use of existing buildings rather than the introduction of new built form and is therefore consistent with the principle of supporting sustainable rural tourism. The submitted information, including the Use Options Appraisal, demonstrates that a range of alternative uses have been considered and that hotel use represents the most viable option to secure the long-term conservation and management of the site's heritage assets. Significant weight is given to this, having regard to national policy (NPPF Policy HE6 points 4-6) which highlights that, *"Important public benefits can include securing the long-term reuse of a vacant or underused listed building..."*

Accordingly, the proposal is considered to accord with the tourism and rural re-use exceptions identified within paragraph 4.25 of the Core Strategy, and the development therefore aligns with the aims of Core Policy CP2 in supporting appropriate forms of rural development, particularly where this secures the long-term conservation of important heritage assets.

National policy reaches a similar conclusion. Policy S3 of the NPPF requires proposals located outside settlements to be assessed against Policy S5. Policy S5 supports, amongst other things, development for rural businesses and tourism where a countryside location is necessary, together with the re-use of existing lawful buildings of permanent and substantial construction. The proposal seeks the re-use of a collection of existing historic buildings for a tourism-related use and therefore falls within categories expressly contemplated by Policy S5. Whilst Policy S5 does not generally apply to development within the Green Belt, it confirms that where development would not constitute inappropriate development through the

application of Green Belt policies GB6-GB8, proposals should be approved unless the benefits are substantially outweighed by adverse effects. As set out within the Green Belt assessment below, the proposal is not considered to constitute inappropriate development and consequently attracts support under Policy S5.

Box Parish Council

The Parish Council confirms that it raises no objection in principle to the proposed change of use, recognising that the development has the potential to secure the long-term viable use of the listed buildings and wider estate. A number of detailed concerns are raised, particularly in respect of:

- the need for further supporting information (including a Conservation Management Plan);
- the scale and operation of the proposed hotel use (including staffing and economic benefits);
- the impact of the development on heritage assets, landscape, ecology and trees;

These matters are addressed within the relevant sections of this report. It is additionally noted that some representations offer support for the proposals particularly in relation to the opportunity to secure a viable long-term use for the listed buildings, support the local economy, and ensure continued investment in the estate. These benefits are material considerations and are taken into account in the overall planning balance.

Conclusion

The proposal represents the re-use of existing buildings within the open countryside for a tourism-related use. Whilst development in such locations is generally restricted, it is considered that, in this instance, the proposal is justified having regard to the relevant provisions of the Wiltshire Core Strategy and national policy relating to rural tourism, the re-use of existing buildings and sustainable development in the countryside.

Furthermore, the proposal would secure a viable long-term use for a collection of designated heritage assets, which is a significant material consideration weighing in favour of the development.

The principle of the proposed change of use is therefore considered to be acceptable, subject to the detailed assessment of other material considerations as follows.

Impact on the Green Belt

Policy Context

The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belt are its openness and permanence.

Policies GB6-GB8 of the NPPF afford strong protection to Green Belt land and establish a presumption against inappropriate development. Development within the Green Belt should not be approved except where it falls within one of the categories of development identified as appropriate by national policy or where any applicable Grey Belt provisions are satisfied.

Development that does not meet these policy tests constitutes inappropriate development and is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

When considering proposals affecting the Green Belt, substantial weight should be given to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt, together with any other harm resulting from the proposal, is clearly outweighed by other considerations.

Assessment

The application site lies within the designated Green Belt, where there is a strong presumption against inappropriate development. Inappropriate development should only be approved where there are very special circumstances and harm to the openness of the Green Belt is outweighed by other considerations.

The proposal principally comprises the change of use of existing lawful buildings to hotel accommodation. No extensions or substantial new built development are proposed as part of this application. As such, the proposal is considered to fall within the exception set out in policy GB7(b) relating to the re-use of existing buildings and is therefore not inappropriate development in the Green Belt.

The proposal also includes ancillary parking associated with the hotel use. The area identified for parking is already largely hard surfaced and no detailed engineering works, structures or extensive operational development form part of the current application. Whilst the parking area represents a change in the function of the land, its physical effect on the openness of the Green Belt would be limited, given the absence of substantial built form and its location within an established estate setting. Accordingly, the proposal would preserve the openness of the Green Belt and would not conflict with its purposes. Even if the ancillary parking element were to be regarded as inappropriate development, the limited nature of the Green Belt harm would be clearly outweighed by the substantial public benefits arising from securing the viable long-term conservation of a collection of designated heritage assets of exceptional significance.

Conclusion

For the reasons set out above, the proposal is considered to accord with Policy GB7(b) of the NPPF and would preserve the openness of the Green Belt and its purposes. The development is therefore not considered to constitute inappropriate development. In any event, even if the ancillary parking element were to be regarded as inappropriate development, the substantial public benefits arising from securing the long-term conservation and viable use of Hazelbury Manor, the Dower House and the Granary would clearly outweigh any limited Green Belt harm.

Impact on Heritage Assets

Policy Context

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 16 (Listed Building Consent)/Section 66 (Planning Permission) 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. Paragraph 58B of the Planning Act 1990 requires that in considering whether to grant planning permission or permission in principle for the development of land in England which affects a registered park and garden, the LPA must have special regard to the desirability of preserving or enhancing the asset or its setting.

The NPPF heritage policies (HE1-HE10) require local planning authorities to identify and assess the significance of any heritage asset that may be affected by a proposal, including the contribution made by its setting. Decision-makers should take account of the desirability of sustaining and enhancing the significance of heritage assets, securing their optimum viable use where consistent with their conservation, and ensuring that new development makes a positive contribution to local character and distinctiveness.

When determining applications affecting heritage assets, great weight should be given to their conservation. The more important the asset, the greater the weight that should be afforded to its conservation. Any harm to, or loss of, the significance of a designated heritage asset must be supported by clear and convincing justification.

Where a proposal would result in harm to the significance of a designated heritage asset, that harm must be clearly identified and categorised. The level of harm should then be weighed against the public benefits of the proposal in accordance with the relevant heritage policies of the NPPF.

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 CP 57: 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.

Assessment

The application site comprises Hazelbury Manor (Grade I listed), the Dower House (Grade I listed) and the Granary (Grade II listed), set within a Grade II Registered Park and Garden. These assets are of exceptional significance, reflecting their architectural, historic and

evidential value and their contribution to the wider historic estate. Their significance is derived not only from the historic fabric of the buildings themselves, but also from their setting within the wider estate, including the designed landscape, historic features, vegetation and the spatial relationship between the buildings and landscape elements.

The application seeks planning permission for the change of use of the existing buildings from residential/agricultural use to hotel use (Use Class C1), together with ancillary parking. It is important to recognise the limited scope of the application. Approval is sought for the principle of the change of use only. Detailed proposals for physical alterations to the listed buildings, including internal alterations, servicing, fire safety measures, accessibility interventions and other works to historic fabric, are not before the Council and would require separate Listed Building Consent and, where necessary, further planning permission.

A number of consultees, including Historic England, the Council's Conservation Officer, SPAB and the Gardens Trust, have highlighted that any future physical works required to facilitate hotel use will need to be carefully designed and justified in order to avoid harm to the significance of the heritage assets. This is acknowledged. However, the Council must assess the proposal before it and cannot speculate on the precise nature of future works which have not yet been submitted. The detailed heritage impacts of such alterations will be considered through subsequent Listed Building Consent applications supported by appropriate documentation including Heritage Impact Assessments, schedules of works and other relevant information.

The representations received raise similar concerns regarding the level of detail currently available, particularly in relation to the future management of the wider estate, non-designated heritage assets, landscape features and the relationship between the principal buildings and their setting. These concerns are understandable given the significance and complexity of the site. However, the current application does not seek approval for wider development across the estate and therefore cannot provide detailed assessment of works that are not currently proposed.

Particular attention has been drawn to landscape features associated with the late twentieth-century evolution of the estate, including the prospect mounds, stone circle, water features and other elements associated with Ian Pollard. Following a site visit, the Gardens Trust confirmed that it was comfortable with the proposals and raised no objection. Whilst continuing to support the preparation of a Conservation Management Plan for the long-term stewardship of the estate, the Trust expressly concludes that the current proposal does not require such a document to be produced prior to determination.

The question for the Council at this stage is therefore whether hotel use represents an appropriate and viable use capable of securing the long-term conservation of the heritage assets. National policy places considerable importance on sustaining heritage assets and securing their optimum viable use where consistent with their conservation. The submitted information indicates that alternative options have been considered and that hotel use is considered the most viable means of securing the long-term occupation, maintenance and conservation of the buildings. This attracts significant weight.

Significantly, none of the specialist heritage consultees object to the principle of hotel use. Historic England, the Council's Conservation Officer, the Gardens Trust and SPAB all

recognise that the proposed use has the potential to secure a sustainable future for the site. The concerns raised relate primarily to the need for further assessment and supporting information as proposals evolve, rather than any in-principle objection to the proposed use itself.

In heritage terms, the change of use itself gives rise to little or no direct harm to the significance of the listed buildings because no physical alterations are proposed or approved through this application. The principal potential impacts arise from the operational consequences of hotel use, including increased activity within the estate and the provision of ancillary parking. Whilst these changes have the potential to affect the setting of heritage assets, the submitted information, including the landscape assessment reviewed by the Cotswold National Landscape Board, indicates that any effects would be limited and capable of mitigation. The Board notes that the long-term effects of the proposals are generally anticipated to be neutral or beneficial.

Taking all matters into account, it is considered that any identified heritage harm would be less than substantial and would occur at the lower end of the spectrum of such harm. That limited harm must be weighed against the public benefits of the proposal, which include:

- securing a viable long-term use for heritage assets of exceptional significance;
- enabling the continued maintenance and conservation of the listed buildings and wider estate;
- supporting the long-term management of the Registered Park and Garden;
- supporting tourism, employment and investment in the local area; and
- providing a sustainable future for a complex of heritage assets that require ongoing occupation and investment.

In this instance, it is considered that the public benefits of the proposal outweigh the limited less than substantial harm identified.

Conclusion

Taking all of the above into account, it is considered that hotel use represents an appropriate and viable use capable of securing the long-term conservation of Hazelbury Manor, the Dower House and the Granary. Whilst the proposal may give rise to a limited degree of less than substantial harm to the setting of heritage assets through increased activity and ancillary parking, that harm would occur at the lower end of the spectrum and is outweighed by the substantial public benefits arising from securing the optimum viable use and long-term conservation of the site.

In reaching this conclusion, the Council has had special regard to the desirability of preserving the listed buildings and their setting, in accordance with Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Design and Impact on the Character and Appearance of the Area

Policy Context

Core Policy 57 of the WCS requires high-quality design that:

- Enhances local character.
- Responds to the natural, historic, and built environment.

- Retains important features (e.g., trees, hedges).
- Supports sustainable construction and compatibility with surrounding uses.
- Creates safe, legible, and accessible spaces.

Policies DP1 to DP4 of the NPPF promote development that is:

- Well-designed and visually attractive.
- Responsive to local character and context.
- Functional, accessible and sustainable.
- Supportive of healthy and inclusive communities.
- Resilient to climate change and environmental impacts.
- Conducive to the creation of high quality places and a positive built environment.

The Wiltshire Design Guide encourages sensitivity to local character, materials, and architectural styles and supports modern living standards while maintaining aesthetic and functional quality.

Building for a Healthy Life Framework promotes healthy, inclusive, and sustainable places. The document encourages:

- Walkability.
- Access to green space.
- Active design principles for well-being.

Assessment & Conclusion

The application site comprises an established group of buildings set within a large historic estate, characterised by a predominantly rural environment. The existing lawful use is a mix of residential and agricultural, with activity on the site currently limited in intensity.

The proposal seeks a change of use to hotel accommodation. Whilst this would result in an increase in activity associated with the site, including vehicle movements, staff presence and visitor activity, it would not introduce significant new built form. The primary physical change relates to the provision of a car parking area, the detailed design of which is not before the Council at this stage.

In principle, the re-use of the existing buildings for a tourism use is considered to be compatible with the character of a large rural estate of this nature. Hotel use is not considered to be inherently at odds with the established character, particularly given the scale of the site and its ability to accommodate activity without fundamentally altering its overall appearance.

Concerns have been raised in representations regarding increased activity, the use of access routes and the interaction with Public Rights of Way. These matters are acknowledged; however, they relate primarily to operational and highways considerations, which are addressed elsewhere in this report.

In terms of visual impact, the absence of significant new built development limits the extent to which the proposal would alter the physical character of the site. Subject to appropriate control over the design and appearance of the proposed car parking and associated works, the

development is not considered to give rise to unacceptable harm to the character and appearance of the area.

Accordingly, the proposal is considered to accord with the design objectives of the development plan, subject to detailed matters being addressed through conditions.

Amenity

Policy Context

Core Policy 57 (Point vii) of the Wiltshire Core Strategy requires development to respect the amenity of existing occupants and ensure appropriate amenity levels for future residents.

Policy P3 of the NPPF requires development to contribute positively to the creation of healthy, safe and inclusive places. In particular, Policy P3(b) seeks to ensure that development provides a high standard of amenity for existing and future users and safeguards the reasonable living conditions of neighbouring occupiers. In assessing amenity impacts, regard should be had to matters including privacy, outlook, daylight and sunlight, overbearing impacts, noise and disturbance, and the overall quality of the living environment created by the development.

These policies guide the assessment of amenity impacts.

Assessment

The application site comprises a large rural estate located within the open countryside. The site is relatively isolated, with a limited number of nearby sensitive receptors.

The proposal seeks a change of use of existing buildings to hotel accommodation. Whilst this would introduce an increase in activity on the site, including vehicle movements, staff presence and general comings and goings, the scale and layout of the estate is such that these activities would be contained within the site and would not result in material harm to neighbouring occupiers.

Concerns have been raised in representations regarding increased activity levels, potential noise and disturbance, and the use of access routes. These concerns are acknowledged; however, given the separation distances involved and the absence of closely adjoining residential properties, it is not considered that the proposal would result in unacceptable levels of noise, disturbance or loss of privacy.

The proposed car parking area and associated movements would also be located within the wider estate, further limiting any direct amenity impacts on neighbouring properties. Matters relating to detailed access arrangements and traffic are addressed separately within the highways section of this report.

In terms of amenity for future occupants, hotel accommodation is a mainstream and appropriate use, and there is no indication that the internal environment would fail to provide

acceptable living conditions, subject to compliance with building regulations and other regulatory regimes.

Conclusion

Taking all of the above into account, it is considered that the proposed development would not give rise to unacceptable impacts on the amenity of existing or future occupants.

The proposal is therefore in accordance with Core Policy 57 of the Wiltshire Core Strategy and the relevant provisions of the National Planning Policy Framework.

Highways Impacts and Parking

Policy Context

The NPPF transport policies (TR3-8) seek to ensure that development is supported by a safe, sustainable and efficient transport system. Development proposals should provide appropriate access arrangements, promote sustainable modes of travel, support active travel and public transport use, minimise impacts on the transport network, and ensure that any residual impacts on highway safety or network capacity are appropriately mitigated.

Transport implications are a key factor in assessing planning applications, particularly for major development proposals. Proposals should demonstrate:

- Safe and suitable access for all users, including pedestrians, cyclists, public transport users and those with mobility impairments.
- That any transport impacts have been appropriately assessed and mitigated.
- Promotion of sustainable travel choices, reducing reliance upon private vehicles where possible.
- Adequate vehicle and cycle parking provision in accordance with adopted standards.
- Protection and enhancement of public rights of way, walking, wheeling and cycling connections.
- Integration with existing and planned transport infrastructure.

Relevant policies include Core Policies 60–64 of the Wiltshire Core Strategy, supported by the Wiltshire Local Transport Plan, Car Parking Strategy, and Cycling Strategy. The Local Cycling and Walking Infrastructure Plan (LCWIP) and LTN 1/20 (DfT) provide further design guidance for active travel infrastructure.

Proposals must also ensure safe access for refuse collection vehicles and comply with the Wiltshire Council Waste Storage and Collection SPD (2017).

Where necessary, Transport Assessments or Statements should be submitted to evaluate impacts and identify mitigation. Planning conditions or legal agreements may be used to secure off-site improvements, travel plans, or contributions to sustainable transport infrastructure.

Assessment

The proposal seeks a change of use of the site to hotel accommodation, which would result in an increase in vehicle movements associated with guests, staff and servicing. Access to the site is proposed via an internal one-way system utilising existing tracks, connecting to the B3109 Bradford Road.

It is noted that the application does not propose alterations to the existing junctions with the B3109, and that the access strategy relies on the use of existing infrastructure within the estate.

Significant concerns have been raised in representations, particularly from the Parish Council, regarding the proposed one-way system, the potential for conflict between users, and the safety of the junctions onto the B3109, including visibility and existing traffic conditions. Concerns have also been raised regarding the potential for increased traffic associated with staff, servicing and events.

These concerns are acknowledged. However, the assessment of highways impacts must be made in light of the actual scale of the proposed development and whether the resulting impacts would be unacceptable in planning terms.

The proposed development represents a change of use rather than a new build scheme, and whilst there would be an uplift in activity, the level of traffic generation is not considered to be of a scale that would result in a severe impact on the local highway network. The surrounding road network, including the B3109, currently accommodates a range of traffic movements, and there is no evidence to demonstrate that the additional traffic associated with the hotel use would materially compromise its operation or safety to an unacceptable degree.

With regard to the access arrangements, the proposed one-way system would utilise existing estate tracks which already experience a degree of vehicular use, including agricultural traffic. Whilst the introduction of hotel use would increase activity along these routes, the principle of shared use within a rural estate context is not considered to be inherently unacceptable.

The concerns raised regarding the absence of passing places, road width and vegetation are noted. However, these matters relate to detailed design and management of the access routes, rather than the principle of the development. Such matters can be addressed through appropriate management measures and, where necessary, secured through condition.

Concerns have also been raised regarding the safety of the junctions with the B3109, particularly in relation to traffic speeds, visibility and the proximity of other uses on the opposite side of the road. Whilst these issues are acknowledged, the proposal does not introduce a level of traffic generation that would be expected to materially alter the existing highway conditions at these junctions.

Taking all of the above into account, it is not considered that the proposal would result in an unacceptable impact on highway safety, nor would it give rise to severe impacts on the highway network that would justify refusal in accordance with national policy.

Public Rights of Way

The application site is crossed by a number of Public Rights of Way, including footpaths and bridleways, which currently serve a range of users including walkers, horse riders and agricultural vehicles.

The proposal would utilise parts of this existing network as part of a one-way access arrangement associated with the hotel use. It is acknowledged that this would lead to an increase in activity along these routes, including vehicle movements associated with guests, staff and servicing.

Concerns have been raised by third parties, including Box Parish Council, the Open Spaces Society and local representations, regarding the potential for increased conflict between vehicles and non-vehicular users of the Public Rights of Way, particularly horse riders.

The Public Rights of Way Officer identified a number of opportunities to improve the wider network, including accessibility enhancements, route upgrades and associated infrastructure improvements. Whilst these suggestions are welcomed, they are not necessary to make the development acceptable in planning terms and fall outside the scope of the current application, which seeks permission for a change of use only and does not propose alterations to the alignment or status of the Public Rights of Way network.

It is noted that the Local Highway Authority's final response was reached following specific consideration of the potential conflict between vehicles and users of Bridleway BOX51 and Footpath BOX54. Whilst the Highway Authority initially raised concerns regarding the absence of passing places and the potential for conflicting movements, it subsequently accepted that the proposed one-way circulation arrangement would significantly reduce that potential conflict and welcomed the proposed use of signage and management measures. Importantly, no objection is raised by either the Highway Authority or the Public Rights of Way Officer to the principle of the development.

In assessing the proposal, it is noted that the routes in question are already used by a mix of users, including vehicles associated with the estate. Whilst the introduction of hotel use would increase activity levels, the use of existing tracks within a large rural estate is not considered to be inherently incompatible with shared use, subject to appropriate management.

Matters relating to detailed design, passing places, and surfacing have been raised; however, these are capable of being addressed, where necessary, through appropriate management measures and do not in themselves justify refusal of the application.

Taking the above into account, it is considered that the proposal would not result in unacceptable impacts on the safe use of the Public Rights of Way network.

Conclusion

Taking all matters into account, including the proposed access arrangements and the concerns raised in representations. These matters are recognised and have been considered. At this stage, the proposal seeks to establish the principle of the use, and detailed

arrangements for access and the management of shared routes would be subject to further consideration and approval where necessary.

Following consultation with the Local Highway Authority and the Council's Public Rights of Way Officer, it is considered that the proposal would not give rise to an unacceptable impact upon highway safety or the operation of the Public Rights of Way network. Whilst management measures and signage will be required to ensure the safe operation of shared routes, the technical consultees raise no objection to the proposal in principle. The development is therefore considered to comply with Core Policies 60, 61 and 64 of the Wiltshire Core Strategy and the relevant provisions of the National Planning Policy Framework

Ecology and Biodiversity

Policy Context

Core Policy 50 of the Wiltshire Core Strategy seeks to protect, conserve and enhance biodiversity across Wiltshire. Development should avoid adverse impacts on ecological assets, protected species and designated sites, and where possible contribute towards habitat restoration, ecological connectivity and wider nature recovery objectives.

The application site is located within a highly sensitive ecological context, including land associated with the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) and in proximity to Box Mine Site of Special Scientific Interest (SSSI). As such, the proposal has been considered having regard to the requirements of the Conservation of Habitats and Species Regulations 2017 and national policy relating to the protection of designated sites, protected species and habitats.

National policy also requires Biodiversity Net Gain (BNG) to be delivered by qualifying developments unless exempt. Where applicable, proposals are expected to demonstrate biodiversity gains through appropriate ecological assessment and habitat evaluation.

Assessment

The application site lies within an environmentally sensitive location, including land associated with the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) and in proximity to Box Mine Site of Special Scientific Interest (SSSI). Ecological considerations have therefore formed a key component of the assessment of the proposal.

Initial ecological consultation responses identified that insufficient information had been provided to fully assess the potential effects of the development on protected species and designated ecological sites. Further survey work and assessment were subsequently undertaken by the applicant, including bat activity surveys, an Ecological Impact Assessment (EclA), and supporting Habitats Regulations Assessment (HRA) information.

The submitted information confirms that bats are present within a number of buildings across the estate and that the wider site forms part of the functional landscape used by bat species associated with the Bath and Bradford-on-Avon Bats SAC. The proposal does not seek consent for physical works to the listed buildings through this application. Nevertheless, the

EclA identified the potential for indirect impacts arising from increased visitor activity, construction activity associated with future works, and changes in lighting within the estate. In response to these concerns, mitigation measures have been proposed including the preparation and implementation of a Construction Environmental Management Plan (CEMP), Landscape and Ecological Management Plan (LEMP), controls over external lighting, ecological enhancement measures and the preparation of a Visitor Management Plan. These measures are intended to ensure that important bat habitats, commuting corridors and roosting opportunities are protected and enhanced.

Having reviewed the additional information, the Council's Ecology Officer concluded that sufficient information had been provided to undertake an Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017. The Appropriate Assessment considered the potential effects of the proposal on the Bath and Bradford-on-Avon Bats SAC, both alone and in combination with other plans and projects, and concluded that the proposal would not result in an adverse effect on the integrity of the SAC, subject to the identified mitigation measures being secured.

Natural England, as the statutory consultee, reviewed the Council's Appropriate Assessment and confirmed that it had no objection subject to conditions. Natural England agreed that, subject to appropriate mitigation and management measures being secured through planning conditions, the proposal would not adversely affect the integrity of the Bath and Bradford-on-Avon Bats SAC. Natural England specifically supported the use of conditions relating to a CEMP, LEMP, Visitor Management Plan and lighting controls.

In relation to Biodiversity Net Gain (BNG), the Council's Ecology Officer advised that the proposal relates solely to the change of use of existing buildings and does not involve operational development resulting in habitat loss requiring mandatory Biodiversity Net Gain assessment. Accordingly, BNG is not considered to be applicable to the current application. Taking account of the submitted ecological information, the advice of the Council's Ecology Officer, the findings of the Appropriate Assessment and the final response from Natural England, it is considered that ecological impacts can be satisfactorily avoided, mitigated and managed through appropriately worded planning conditions.

In respect of ecology, trees and biodiversity, representations highlighted the ecological sensitivity of the site and the need for appropriate surveys and mitigation. These matters are addressed through consultation with the Council's ecological advisors and relevant supporting information submitted with the application. Further details may be required and secured through condition or subsequent applications where necessary.

Conclusion

Subject to the recommended planning conditions, the proposal is considered acceptable in ecological terms and accords with Core Policy 50 of the Wiltshire Core Strategy. Furthermore, having undertaken an Appropriate Assessment under the Habitats Regulations and having regard to Natural England's advice, the Council is satisfied that the proposal would not result in an adverse effect on the integrity of the Bath and Bradford-on-Avon Bats Special Area of Conservation

Landscape and Visual Impact

Policy Context

Core Policy 51 of the Wiltshire Core Strategy requires development to:

- Protect, conserve, and enhance landscape character and quality.
- Respect local distinctiveness, key views, and visual receptors.
- Give particular weight to impacts on National Landscapes and locally valued landscapes.

The Wiltshire Design Guide SPD (2024) promotes a context-led approach, encouraging integration with natural features and settlement patterns while avoiding visual intrusion.

The Green & Blue Infrastructure Strategy (2022–2030) supports landscape protection through green infrastructure, habitat connectivity, and nature-based solutions.

The NPPF seeks to conserve and enhance the natural environment and protect valued landscapes. Policy N2 of the NPPF requires decision-makers to consider the environmental qualities of land proposed for development and to conserve and enhance existing natural features of visual, historic or nature conservation value, including established trees and hedgerows where possible. The policy also seeks to ensure that landscaping and natural features are used to help integrate development into its surroundings.

Planning decisions should:

- Recognise the intrinsic character, quality and natural beauty of the landscape.
- Safeguard landscape character, local distinctiveness, important views and landscape settings.
- Ensure development is appropriately integrated into its surroundings through sensitive siting, layout, scale and design.
- Avoid unacceptable visual intrusion and adverse effects on valued or designated landscapes.

Landscape impacts should be considered alongside biodiversity, heritage and green infrastructure objectives, with appropriate mitigation and enhancement measures incorporated where necessary.

Policy N4 of the NPPF affords significant protection to Protected Landscapes, including National Landscapes. Development proposals within National Landscapes should be limited in scale and extent and sensitively located and designed to avoid harm to their statutory purposes and special qualities. Substantial weight should be placed on the importance of conserving and enhancing the natural beauty of these areas.

Under Section 245 of the Levelling-up and Regeneration Act 2023, the Council must seek to further the purposes of National Landscapes when exercising its planning functions. This is an active duty requiring decision-makers to take reasonable and proportionate steps to support the conservation and enhancement of the natural beauty, special qualities and key characteristics of these designated landscapes.

Assessment

The application site lies within the Cotswolds National Landscape, a nationally designated landscape which carries the highest status of protection in respect of landscape and scenic beauty. As such, great weight must be given to conserving and enhancing the landscape and visual qualities of the area.

The proposal relates primarily to the change of use of existing buildings to hotel accommodation, with limited physical alterations proposed as part of the application. The principal potential landscape impact arises from the proposed car parking area and any associated changes in land use within the wider estate.

The Cotswolds National Landscape Board initially raised a holding objection to the application, citing insufficient information to assess landscape, visual and dark skies impacts, including a lack of a landscape-led assessment of the proposal. Following the submission of additional information, including a landscape appraisal, the Board confirmed that the principle of the development is supported and accepted the conclusions that the proposed car park would give rise to low levels of visual impact, with mitigation and landscaping capable of further reducing effects over time.

The submitted landscape assessment indicates that the proposed development would have a limited visual effect, particularly when viewed in the context of the wider estate. The site benefits from an established landscape structure, including mature vegetation and topography, which provides a degree of containment. Over time, proposed green infrastructure and landscaping measures are anticipated to integrate the development into the landscape and may result in neutral or beneficial effects.

It is acknowledged that detailed landscaping proposals have not been provided at this stage, and concerns have been raised by consultees regarding the need for a comprehensive approach to landscape management. These matters are considered capable of being addressed through planning conditions requiring the submission of a detailed landscaping scheme and long-term management arrangements.

In considering the statutory duty to “seek to further” the purposes of the National Landscape, it is recognised that the proposal involves the re-use of an existing estate and, subject to appropriate mitigation and management, has the potential to support the ongoing stewardship and enhancement of the landscape in the long term.

Taking the above into account, and subject to appropriate conditions, the proposal is not considered to give rise to unacceptable harm to the character and appearance of the landscape or the special qualities of the National Landscape.

Conclusion

The proposal would result in limited landscape and visual effects, primarily associated with the introduction of the car park and increased use of the site.

Notwithstanding the sensitivity of the location within the Cotswolds National Landscape, it is considered that the impacts would be localised and capable of mitigation, and would not result in unacceptable harm to landscape character, visual amenity, or the special qualities of the designated landscape.

Subject to the imposition of conditions securing detailed landscaping and long-term management, the proposal is considered to accord with Core Policy 51 of the Wiltshire Core Strategy, the Wiltshire Design Guide, and the relevant provisions of the National Planning Policy Framework.

Flood Risk and Drainage

Policy Context

Core Policy 67 of the WCS outlines that all new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.

Sustainable Drainage Systems (SuDS) are required for all major developments and must:

- Manage runoff near its source.
- Improve water quality.
- Support biodiversity and amenity.
- Be integrated into the site layout and green infrastructure.

The NPPF requires flood risk to be taken into account at all stages of the planning process and seeks to direct development away from areas at highest risk of flooding. Policies F4, F5 and F6 require flood risk to be assessed through site-specific Flood Risk Assessments where necessary, the application of the Sequential Test where applicable, and the Exception Test in those circumstances identified by national policy.

Where appropriate, applications should be supported by a site-specific Flood Risk Assessment. Development should only be supported where it can be demonstrated that it will be safe for its lifetime, taking account of the vulnerability of its users, without increasing flood risk elsewhere and, where possible, reducing flood risk overall.

Development should demonstrate that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk where practicable;
- b) the development is appropriately flood resistant and resilient;
- c) sustainable drainage systems are incorporated where appropriate;
- d) any residual flood risk can be safely managed; and
- e) safe access and escape routes are provided where necessary.

Assessment

The application site lies within Flood Zone 1, which represents an area of lowest probability of flooding. The proposal relates primarily to the change of use of existing buildings, with limited additional hardstanding associated with the proposed car parking area.

The Council's Drainage Officer raises no objection to the development in principle, subject to conditions requiring the submission of a detailed surface water drainage strategy and arrangements for the management and maintenance of sustainable drainage systems. It is noted that insufficient information has been provided at this stage regarding the existing and proposed drainage arrangements; however, these matters can be appropriately addressed through condition.

Taking the above into account, it is considered that the proposal would not increase flood risk on or off site and is capable of complying with the requirements of Core Policy 67 of the Wiltshire Core Strategy and national policy.

Conclusion

Subject to the imposition of appropriate conditions to secure a surface water drainage strategy and long-term management, the proposal is considered acceptable in flood risk and drainage terms.

Environmental Considerations (Noise, Air Quality, Contaminated Land, etc.)

Policy Context

Core Policies 55 and 56 of the Wiltshire Core Strategy require:

- Development proposals to avoid unacceptable environmental impacts.
- To provide appropriate mitigation where risks are identified.

The NPPF and Planning Practice Guidance (PPG) reinforce this by stating that proposals should:

- Prevent unacceptable risks from pollution, contamination, noise, vibration, artificial lighting and poor air quality.
- Ensure that existing and future occupants are protected from unacceptable environmental impacts.
- Ensure that land is suitable for its intended use, taking account of ground conditions and contamination risks.
- Secure appropriate mitigation and remediation where environmental risks are identified.
- Apply the principle that those responsible for contamination are responsible for its remediation.

Wiltshire Council's Air Quality SPD (2023) provides detailed guidance, especially near Air Quality Management Areas (AQMAs) and encourages mitigation such as:

- EV charging infrastructure
- Green buffers
- Sustainable transport options

Assessment

The proposal relates to the change of use of existing buildings to hotel accommodation within a rural location, with no significant industrial processes or activities proposed. As such, the risk of pollution or contamination is considered to be low.

The Council's Public Protection Officer has been consulted on the application. No objection has been raised in principle, and it is considered that any potential impacts arising from the proposed use, including noise, external lighting or operational activities, can be appropriately controlled through standard regulatory regimes and, where necessary, planning conditions.

It is noted that the site is not located within an Air Quality Management Area, and the scale of development is not considered likely to give rise to significant air quality impacts.

Concerns raised in representations regarding disturbance and activity levels have been considered as part of the amenity assessment above.

Taking the above into account, it is considered that the proposal would not result in unacceptable environmental impacts.

Conclusion

The proposal is considered to comply with Core Policies 55 and 56 of the Wiltshire Core Strategy and the relevant provisions of the National Planning Policy Framework, and is acceptable in environmental terms.

Other : Response to Representations regarding Conservation Area

Concerns have been raised regarding the absence of Conservation Area designation at Hazelbury Manor. The designation of Conservation Areas is a separate, plan-led process undertaken by the Local Planning Authority, involving detailed appraisal, consultation and formal designation procedures. It is not a matter that can be considered or determined through the assessment of a planning application.

The site is already subject to a high level of statutory and policy protection, including Grade I and Grade II listed buildings, a Grade II Registered Park and Garden, location within the Cotswolds National Landscape and the Green Belt. These designations ensure that the significance of the site and its wider setting are afforded considerable weight in the decision-making process.

Whilst Conservation Area designation can provide additional control over certain types of development, including works to unlisted buildings and some tree works, it would not materially increase the level of protection afforded to the principal heritage assets in this instance.

Furthermore, mechanisms such as Tree Preservation Orders remain available to the Local Planning Authority where specific protection is considered necessary.

The absence of Conservation Area designation does not therefore diminish the significance of the site or the level of protection applied to it and is not a matter that weighs against the principle of the proposed development.

Pre-commencement Condition Agreement

This recommendation includes pre-commencement planning conditions relating to archaeology, CEMP, LEMP and Surface Water Drainage. In accordance with Section 100ZA of the Town and Country Planning Act 1990 and the Town and Country Planning (Pre-commencement Conditions) Regulations 2018, the Local Planning Authority formally notified the applicant/agent of the proposed condition(s) and sought their agreement. Written confirmation of agreement was received from the applicant's agent on 25th August 2026.

PLANNING BALANCE AND CONCLUSION

The application seeks to establish the principle of changing the use of Hazelbury Manor, the Dower House and the Granary to a hotel use, together with ancillary parking. It does not seek approval for the detailed physical alterations required to facilitate that use, nor does it include the detailed design, layout, surfacing, lighting, drainage or landscaping of the proposed parking area. Those matters would require further planning and listed building consent applications, as appropriate. Approval of the present application would not therefore predetermine the acceptability of any particular works subsequently proposed.

The site lies outside a defined settlement boundary and within the open countryside. However, the proposal involves the reuse of existing rural buildings for a tourism-related purpose and is supported in principle by Core Policies 39, 40 and 48 of the Wiltshire Core Strategy. Although the site has limited access to local services and future users would be significantly reliant on private vehicles, this must be considered in the context of a location-specific hotel use involving an established historic estate. Particular weight is placed on the opportunity to secure the viable long-term occupation, maintenance and conservation of Hazelbury Manor, the Dower House and the Granary, which are designated heritage assets of the highest significance.

The proposal principally involves the reuse of existing lawful buildings, without extensions or substantial new built development. It is therefore considered to fall within the Green Belt exception for the reuse of existing buildings under Policy GB7(b) of the National Planning Policy Framework. The ancillary parking would be located on land that is already largely hard surfaced and, on the information presently available, would have only a limited effect on openness. The proposal is consequently not considered to constitute inappropriate development in the Green Belt. In any event, should the ancillary parking element be regarded as inappropriate development, the limited harm arising would be clearly outweighed by the substantial public benefit of securing a viable long-term use for the highly significant listed buildings.

The Council has had special regard to the desirability of preserving the listed buildings, their settings and the Registered Park and Garden. The change of use itself would cause little or no direct physical harm, as the alterations required to facilitate the hotel use are not included within this application. Any limited less than substantial harm arising at this stage would relate

principally to the operational consequences of hotel use, including increased activity and ancillary parking. This harm is afforded great weight but is considered to be outweighed by the public benefits arising from securing the optimum viable use, continued occupation and long-term conservation of the heritage assets. The detailed effects of future alterations on historic fabric and significance will require full assessment through the listed building consent process and cannot be assumed to be acceptable by virtue of this permission.

The concerns raised by Box Parish Council and other interested parties have been carefully considered. These include the absence of detailed proposals, the need for a Conservation Management Plan, potential impacts upon the wider historic estate and non-designated features, highways and Public Rights of Way, ecology, landscape, lighting, drainage, servicing, public access and the future management of the estate. These concerns are understandable given the sensitivity and complexity of the site.

However, a distinction must be drawn between matters necessary to determine whether the proposed use is acceptable in principle and the detailed design and implementation matters that will arise at the next stage. The present application does not authorise alterations to the listed buildings or detailed works to the car park, access routes or wider estate. Those works will require further approval where they constitute development or works requiring listed building consent. The current permission cannot be relied upon as acceptance of the detailed form of those works, which must be supported by the necessary heritage, landscape, ecological, drainage, highway and design information and assessed on their individual merits.

The absence of that detailed information does not, however, prevent determination of the current application where the evidence demonstrates that the proposed use is acceptable in principle and where necessary controls can lawfully and reasonably be secured. Historic England, the Council's Conservation Officer, the Gardens Trust and SPAB have not objected to the principle of hotel use, although they identify further work and supporting documentation that will be required as the proposals develop. Following its site visit, the Gardens Trust confirmed that it was comfortable with the proposals and did not consider that a Conservation Management Plan was required before determination of this application, while continuing to support preparation of such a plan for the long-term stewardship of the estate.

The highway and Public Rights of Way concerns have also been considered. The proposal would increase vehicle activity and would rely substantially upon private transport. Nonetheless, the Highway Authority raises no objection subject to conditions and accepts that the anticipated traffic generation would not result in an unacceptable impact on highway safety or a severe effect upon the highway network. The shared use of existing estate tracks and Public Rights of Way will require appropriate management, but the evidence does not demonstrate an impact sufficient to justify refusal of the change of use in principle.

The potential effects upon the Bath and Bradford-on-Avon Bats Special Area of Conservation have been subject to detailed consideration. Following the submission of further ecological information, the Council undertook an Appropriate Assessment under the Habitats Regulations. This concluded that the proposal would not adversely affect the integrity of the SAC, either alone or in combination with other plans and projects, provided the identified mitigation is secured. Natural England has reviewed that assessment and raises no objection subject to conditions, including controls relating to ecological mitigation, lighting, construction,

landscape and ecological management, and visitor management. The Council can therefore be satisfied that the proposal would not adversely affect the integrity of the SAC, subject to those measures being appropriately secured.

The site is within the Cotswolds National Landscape and the proposal must be considered against the duty to seek to further the conservation and enhancement of its natural beauty. The Cotswolds National Landscape Board accepts the submitted assessment of landscape effects and supports the principle of development, subject to landscaping, lighting and long-term management controls. The physical and visual effects would be limited and localised, principally arising from the ancillary parking and increased activity, and are capable of satisfactory mitigation. The proposal would not therefore cause unacceptable harm to the character, tranquillity or special qualities of the National Landscape.

No unacceptable effects have been identified in relation to neighbouring amenity, noise, drainage or flood risk, subject to appropriate controls. The Council's technical consultees raise no objection in principle in relation to these matters. Any subsequent applications will provide the opportunity to consider the detailed operational and physical effects once the precise works and arrangements are known.

In the overall planning balance, significant weight is given to the reuse of existing buildings and to securing a viable and sustainable future for Grade I and Grade II listed heritage assets. Further positive weight is afforded to the contribution the proposed use could make to tourism, employment, local businesses and the ongoing management of the estate, although the precise scale of those economic benefits has not yet been fully quantified.

Against these benefits must be weighed the rural and relatively inaccessible location of the site, increased traffic and activity, limited less than substantial heritage harm associated with the operational consequences of the use, and the potential effects upon landscape, ecology, Public Rights of Way and the amenities of the area. On the evidence available, those impacts would be limited and can be avoided, mitigated or appropriately controlled. They do not individually or cumulatively outweigh the substantial benefits of securing an appropriate viable use for the heritage assets.

The application has been assessed against the development plan as a whole and the National Planning Policy Framework. The principle of hotel use is supported by the rural tourism, hotel and rural building reuse policies of the Wiltshire Core Strategy. The development is acceptable in Green Belt terms; would not result in an adverse effect upon the integrity of the Bath and Bradford-on-Avon Bats SAC; would not cause unacceptable harm to highway safety, landscape character, residential amenity or flood risk; and would provide a viable use capable of supporting the long-term conservation of the heritage assets.

It is therefore concluded that the proposal represents sustainable development and that the planning balance weighs in favour of approval, subject to conditions.

RECOMMENDATION: That Planning Permission be GRANTED, subject to conditions

1. Time Limit

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

2. Approved Plans

The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

- Site Location Plan 2956-0010-P7 received 9 Jan 2026
- Proposed Site Plan 2956-055 received 9 Jan 2026
- Technical Note Transport received 16/03/2026
- Hazelbury Manor Landscape Analysis of Key Views Parts 1, 2 and 3 received 16/04/2026
- Options Appraisal Hazelbury Manor WA and RSL received 8 Apr 2026
- Highway Consultant Statement received 14 Jan 2026
- Flood Risk Assessment received 14 Jan 2026
- Planning statement received 9 Jan 2026
- Setting and Car Park Statement received
- Heritage Statement received 9 Jan 2026

REASON For the avoidance of doubt and in the interests of proper planning.

3. Archaeology

No development shall take place until a programme of archaeological work has been secured in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved scheme.

REASON: To ensure that archaeological features are appropriately investigated and recorded.

4. Visitor Management Plan

Prior to the first use of the hotel hereby approved, a Visitor Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall include measures for the management of visitor activity within the estate, including measures to avoid adverse effects on ecological receptors and designated sites. The approved Plan shall thereafter be implemented and maintained.

REASON: To ensure that visitor activity does not adversely affect ecological interests, including the Bath and Bradford-on-Avon Bats Special Area of Conservation.

5. Compliance with submitted documents (ECOLOGY)

The development will be carried out in strict accordance with the following documents:

- Shadow Habitat Regulations Assessment. June 2026. Ethos Environmental Planning. Project No. ETH26-357;
- RE: Hazelbury Manor HRA. 30 July 2025. Ethos Environmental Planning;
- Ecological Impact Assessment. 12 March 2026. BSG Ecology. Project No. P25-359;
- Preliminary Ecological Appraisal. 15 August 2025. BSG Ecology. Project No. P25-359;

REASON: For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity.

6. Construction Environmental Management Plan (CEMP)

Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:

- a. Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.
- b. Working method statements for protected/priority species, such as nesting birds, bats, badgers and reptiles.
- c. Mitigation strategies already agreed with the local planning authority prior to determination, such as for nesting birds, Priority Habitat Traditional Orchard, Box Mine SSSI, Woodland, hedgerows and bats; this should comprise the pre-construction/construction related elements of strategies only.
- d. Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.
- e. Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).

Development shall be carried out in strict accordance with the approved CEMP.

REASON: To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.

7. Landscape and Ecological Management Plan (LEMP)

Prior to the start of construction, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature within the development, together with a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management to attain targets. The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.

REASON: To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

8. Lighting

No external light fixture or fitting will be installed within the application site unless details of existing and proposed new lighting have been submitted to and approved by the Local Planning Authority in writing. The submitted details will demonstrate how the proposed lighting will impact on bat habitat compared to the existing situation.

The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

REASON: To avoid illumination of habitat used by bats

9. Surface Water Drainage

No development shall commence until a detailed surface water drainage strategy has been submitted to and approved in writing by the Local Planning Authority. The strategy shall include:

- existing drainage arrangements
- proposed drainage design
- discharge rates

The development shall be carried out in accordance with the approved details.

REASON: To ensure the development does not increase flood risk.

10. Noise (Plant and Equipment)

Prior to the installation of any plant or mechanical equipment, a noise impact assessment shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

REASON To protect residential amenity.

11. Kitchen Extraction / Odour Control

Prior to the operation of any kitchen ventilation or extraction system, details of the system, including odour control measures, shall be submitted to and approved in writing by the Local Planning Authority.

The approved system shall be installed prior to first use and retained thereafter.

REASON: To prevent unacceptable odour impacts.

12. Use Restriction

The development hereby permitted shall be used solely as a hotel (Use Class C1) and for no other purpose (including any other purpose in Class C1 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended) or any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order).

REASON: To ensure the use remains consistent with that assessed.

13. ROW ACCESS

No construction / demolition vehicle access may be taken along BOX51 and BOX54 without prior consultation with the Wiltshire Council Rights of Way Warden. Where appropriate any safety/mitigation/reinstatement measures must be approved by the Wiltshire Council Rights of Way Warden.

REASON: To ensure the public right of way remains available and convenient for public use.

INFORMATIVES:

PUBLIC RIGHTS OF WAY

The applicant is advised that concerns have been raised by the Council's Public Rights of Way Officer regarding the use of existing routes within the site as part of the proposed access arrangements. These include opportunities to improve the safety and convenience of users, including walkers and horse riders.

The applicant is encouraged to engage with the Public Rights of Way team to explore potential improvements to the network, including measures such as passing places, surfacing improvements and accessibility enhancements, as part of the detailed design and management of the site.

ACCESS OVER PUBLIC FOOTPATH/BRIDLEWAY

The application indicates access to the application site will be over land which is subject to a public footpath/bridleway. Section 34 of the Road Traffic Act states that "...if without lawful authority a person drives a motor vehicle-

(b) on any road being a footpath or bridleway he is guilty of an offence".

Lawful authority is taken to mean the express permission of the owner of the land.

The applicant should ensure that all necessary rights in respect of vehicular access to the application site can be secured.

BAT ROOSTS

The roof space of Hazelbury Manor, Bradford Road, Hawthorn, Corsham, SN13 8HX is used as a bat roost. Under the Conservation of Habitats and Species Regulations 2017 (as amended), it is an offence to harm or disturb bats or damage or destroy their roosts. Planning permission for development does not provide a defence against prosecution under this legislation. The applicant is advised that a European Protected Species Licence will be required before any work is undertaken to implement this planning permission. Future conversion of the roof space to living accommodation or replacing the roof could also breach this legislation and advice should be obtained from a professional bat ecologist before proceeding with work of this nature.

ARTIFICIAL LIGHTING

The habitat within the proposed development site and the surrounding area is suitable for roosting, foraging and commuting bats. An increase in artificial lux levels can deter bats which could result in roost abandonment and/or the severance of key foraging areas. This will likely result in a significant negative impact upon the health of bat populations across the region. Artificial light at night can have a substantial adverse effect on biodiversity. Any new lighting should be for the purposes for safe access and security and be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2021), and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals