

APPLICATION FOR FULL-PLANNING PERMISSION & LISTED BUILDING CONSENT CASE OFFICER REPORT

APPLICATION REFERENCE:	PL/2026/01841 & PL/2026/02025
APPLICATION TYPE:	Full planning permission / Listed building consent (Alt/Ext)
SITE ADDRESS:	47 The Bell House Hotel, High Street, Sutton Benger, SN15 4RH
DEVELOPMENT DESCRIPTION:	Proposed internal and external alterations to hotel to include demolition of single storey toilets and associated works
RECOMMENDATION:	FULL: Approve with Conditions LBC: Approve with Conditions

SITE DESCRIPTION/CONTEXT

The Bell House Hotel is located at a prominent position on the southern side of High Street, which runs east-west centrally through Sutton Benger. The site is bound to the north by that highway, from which access is taken. The building is located at the western edge of the plot, set back somewhat from the road with some soft landscaping in between. The car-park is centrally located within the plot and fronts the road; soft landscaping wraps around the eastern edge of the plot from the highway around the southern edge of the car park and building.

To the east the site is bound by the dwelling of no.5 Bell Place (which is accessed off Chestnut Drive from the south); to the west is footpath ('Bell Lane') which links High Street to the residential development at Chestnut Drive to the south, and on the other side of which is residential dwelling facing High Street (no.45), and a garage block facing Chestnut Drive. To the immediate southern boundary is residential property Bell House Barn, of low form and which formerly formed an ancillary building to the public house.

The building is listed, with the List Description stating the following:

*'List Entry Number: **1200602***

SUTTON BENDER HIGH STREET ST 9478 (south side)

12/287 The Bell House Hotel

GV II

House now hotel, C16 altered in early C19, painted rubble stone with stone slate roofs and brick stacks. Two storeys, L-plan with early C19 flush mullion windows, hoodmoulds and Gothic cast-iron small-paned glazing. Four 2-light windows above, two 3-lights, half-glazed door in depressed-arched surround with hoodmould and 3- light below. The second bay has gable over and fourth bay is gabled end of cross wing with large brick stack to left. Cross wing roof is swept low on west side. East end wall has similar 2- light and 3-light. South west rear wing is in two sections with stack between, the roof hipped at south end over window in C18 stone architrave. C20 additions in rear angle and behind. Interior: ground floor wholly altered apart from large timber- lintel fireplace in west end room. Some windbracing in roof.

Sutton Benger is designated as a 'Large Village' within the Core Strategy and the site falls within the Sutton Benger Conservation Area which washes over a relatively large extent of the settlement and includes a number of listed buildings, notably the Church of All Saints (Grade II*) and The Old Rectory (Grade II). A tree along the site frontage (on the landscape area to the east of the car park) benefits from Tree Protection Order (N/TPO2). In terms of flood risk, the site is within Flood Zone 1 and the only area at risk of surface flooding is at the site access.

PROPOSAL

This application relates to internal and external works to the listed building, as well as alterations to the site and boundary features.

The submitted Design and Access Statement confirms the rationale of the scheme, and longer-term intentions for the site being as follows:

"The Bell House closed in October 2025 and is now under new ownership. The intention is to re-open the hotel following refurbishment, part of which requires the need to submit this planning application and associated listed building consent.

The new owners wish to re-open the premises as soon as possible, to serve the local community as well as tourists, to start making an income from the site. This proposal will allow the hotel to be upgraded and the ancillary bar/restaurant to re-open at the front of the building, with the café relocated to the main building. The existing 14 hotel bedrooms rooms will also be upgraded and refurbished to provide just 7 rooms including family suites plus provision of new manager's accommodation. The existing office/reception area is to be relocated into the former post office/cafe area of the site."

This application relates to the proposed works to the building(s) and does not include or propose any change of use of the building. It is understood that any proposed change from the existing lawful use will be dealt with by way of a separate application subsequently.

Revised plans were submitted during the course of determination, in particular following a site meeting to provide clarification and additional on matters including the window details and the proposed flooring.

The proposed works are summarised as:

To the building

- Re-location of the (currently closed) to the southern rear portion of the L-shaped plan
- A larger ancillary office relocated to the former post-office area of the building
- Demolition of enclosed flat roof extension area, and stairway, to allow for creation of entrance courtyard
- Associated internal alterations to layout, including re-location of cellar wall and replacement of existing entrance and office space with toilets
- Infill of external wall to male toilets under existing lintel
- Alteration to hotel bedroom layout

- Creation of Landlords flat from the 3 rooms at rear of main hotel, with front door installed in corridor
- Various alterations to first floor layout to both front and rear elements, including: new staircase in rear corridor; modern studwork removed and new erected; doors amended to window openings
- Replacement bathrooms and fire doors and electrics

External / site works

- Creation of entrance and passage from Bell Lane direct to kitchen area (and associate alterations)
- Remove raised concrete triangle and repair any damage to stone wall
- Plant Beech hedge alongside temporary post and wire fence
- Erect fence next to gas tanks
- Ground level of existing rear patio to be reduced and relayed (to stop water ingress to proposed office)
- Ramp to bar side door

[Works for maintenance and like-for-like repairs do generally not need listed building consent.]

Windows

Further details regarding windows was provided during the course of determination, this information confirms that where replacement windows are proposed, these will be of painted hardwood; all repaired windows will be painted timber to match existing.

PLANNING HISTORY

Proposal / Summary
PL/2025/02788 – Listed building consent Decision – Withdrawn Date: 20/05/2025 – Proposed Partial Demolition of Existing Hotel to form new dwelling along with the Erection of 3 New Dwellings with Associated Landscaping
PL/2025/02554 – Full planning permission Decision – Withdrawn Date: 20/05/2025 – Proposed Partial Demolition of Existing Hotel to form new dwelling along with the Erection of 3 New Dwellings with Associated Landscaping
PL/2024/02644 – Listed building consent Decision – Withdrawn Date: 19/07/2024 – Proposed partial demolition of existing hotel to form new dwelling along with the erection of 4 new dwellings with associated landscaping
PL/2024/02340 – Full planning permission Decision – Withdrawn Date: 19/07/2024 – Proposed partial demolition of existing hotel to form new dwelling along with the erection of 4 new dwellings with associated landscaping
PL/2023/00979 – Listed building consent Decision – Withdrawn Date: 15/03/2023 – Proposed Partial Demolition of Existing Hotel to form tourism accommodation
PL/2023/00813 – Full planning permission Decision – Withdrawn Date: 15/03/2023 – Proposed Partial Demolition of Existing Hotel to form tourism accommodation
18/05854/LBC - Listed building consent Decision - Approve with Conditions Date: 8/8/2018 – Proposed Re-building of Existing Outbuilding to create New Dwelling with associated landscaping (Amendment to Listed Building Consent 17/10158/LBC to allow for use of natural slate on the roof)

17/10158/LBC - Listed building consent Decision - Approved Date: 7/12/2017 – Proposed Re-building of Existing Outbuilding to create New Dwelling with associated landscaping.
17/09800/FUL - Full planning permission Decision - Approve with Conditions Date: 7/12/2017 – Proposed Re-building of Existing Outbuilding to create New Dwelling with associated landscaping.
17/03980/LBC - Listed building consent Decision - Approved Date: 6/7/2017 – Proposed conversion & extension of existing outbuilding into new dwelling with associated landscaping.
17/03320/FUL - Full planning permission Decision - Approve with Conditions Date: 6/7/2017 – Proposed conversion & extension of existing outbuilding into new dwelling with associated landscaping.
N/12/00196/FUL - Full planning permission Decision - Approve with Conditions Date: 2/7/2012 – Erection of New Village Shop, Associated Residential Accommodation Incorporating Existing Outbuilding, Associated Access & Servicing Arrangements
N/12/00195/LBC - Listed building consent Decision - Approve with Conditions Date: 2/7/2012 – Erection of New Village Shop, Associated Residential Accommodation Incorporating Existing Outbuilding, Associated Access & Servicing Arrangements.
N/08/00241/FUL - Full planning permission Decision - Withdrawn Date: 27/3/2008 – Install New Kitchen Extract System in New Location and House Flue in Dormer
N/08/00240/LBC - Listed building consent Decision - Withdrawn Date: 27/3/2008 – Install New Kitchen Extract System in New Location and House Flue in New Dormer
N/04/02420/FUL - Full planning permission Decision - Approve with Conditions Date: 4/10/2004 – EXTENSIONS
N/03/01473/FUL - Full planning permission Decision - Approve with Conditions Date: 15/7/2003 – SINGLE STOREY SIDE AND REAR EXTENSIONS AND ROOMS IN ROOF
N/92/01956/FUL - Full planning permission Decision - Approved Date: 14/12/1992 – CONSTRUCTION OF NEW DOCTORS SURGERY/CAR PARKING AND ACCESS DOCTORS SURGERY/PARKING/ACCESS
N/87/01059/FUL - Full planning permission Decision - Approved Date: 16/6/1987 – CONSTRUCTION OF NEW FIRE ESCAPE
N/79/00244/F - Historic apps 1974 to 1983 Decision - Approve Date: 9/4/1979 – POSITIONING OF TWO L.P.C. (CALOR GAS) TANK.
N/79/00135/F - Historic apps 1974 to 1983 Decision - Approve with Conditions Date: 20/12/1979 – Residential development (12 houses and garages)
N/78/01763/F - Historic apps 1974 to 1983 Decision - Approve Date: 22/1/1979 – SINGLE STORY EXTENSION

This application proposal follows relatively recent proposals which sought permission for the partial demolition of the building and the erection of replacement dwellings.

RELEVANT LEGISLATION, POLICIES AND GUIDANCE

Statutory Legislation:

- The Town & Country Planning Act 1990
- The Planning (Listed Building and Conservation Areas) Act 1990

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 requires that **special regard** be given to the desirability of preserving listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 also requires the Council to pay special attention to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.

National Planning Policy:

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

The National Planning Policy Framework (NPPF) sets out government policy, including in respect of the historic environment.

Section 16 of the NPPF ('Conserving and enhancing the historic environment') sets out the Government's high-level policies concerning heritage and sustainable development.

Paragraphs 213-215 of the NPPF require a balanced approach with any harm which would be caused being weighed against the potential public benefits which might be achieved. Paragraph 210 requires local planning authorities to take account of the desirability of sustaining and enhancing the significance of heritage assets and of new development making a positive contribution to local character and distinctiveness.

Section 14 of the NPPF addresses the challenge of climate change, flooding and coastal change. Paragraph 167 advises that "Local planning authorities should also give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights).

National Planning Practice Guidance provides guidance on interpreting the NPPF.

Historic England Advice Note 2: Making changes to Heritage Assets, illustrates the application of policies set out in the NPPF in determining applications for LBC (and planning permission).

Historic England's publication 'Traditional Windows – Their Care, Repair and Upgrading (2017)' encourages the retention of windows that contribute to the significance of listed buildings but sets also out their approach to the alteration/replacement of windows where this is acceptable in principle:

1. Where historic windows, whether original or later insertions, make a positive contribution to the significance of a listed building they should be retained and repaired where possible. If beyond repair they should be replaced with accurate copies.
2. Where historic windows have already been replaced with windows whose design follows historic patterns, these usually make a positive contribution to the significance of listed buildings. When they do, they should therefore be retained and repaired where possible. If beyond repair they should be replaced with accurate copies.
3. Where historic windows or replacement windows of historic pattern survive without historic glass it may be possible to introduce slim-profile double-glazing without

harming the significance of the listed building. There are compatibility issues to consider as the introduction of double-glazing can require the renewal of the window frame to accommodate thicker glazing, thereby harming significance. These issues are covered in Section 4 of this guidance.

4. Where historic windows have been replaced with ones whose design does not follow historic patterns, these are unlikely to contribute to the significance of listed buildings. Replacing such windows with new windows of a sympathetic historic pattern, whether single-glazed or incorporating slim-profile double-glazing, may cause no additional harm. It also provides an opportunity to enhance the significance of the building, which is the desired outcome under national policy.
5. Where a new window or re-glazing is agreed, the reflective properties of secondary and double-glazing as compared to modern, polished single-glazing, do not usually harm the significance of the building. But when new multi-paned windows are proposed, the desirability of reproducing broken reflections by individually glazing each pane should be considered. Where the aesthetic value of the building is high, then the impact on the whole of the relevant elevation should be considered, including the desirability of accurately matching other windows.

Historic England Advice Note 18: Adapting Historic Buildings for Energy and Carbon Efficiency, provides advice in support of consistent decision making on approaches to improve the energy efficiency and support carbon reduction of historic buildings, whilst conserving their significance.

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 3 Infrastructure Requirements;
- Core Policy 10 Spatial Strategy for the Chippenham Community Area
- Core Policy 41 Sustainable Construction and Low-Carbon Energy;
- Core Policy 50 Biodiversity and Geodiversity;
- Core Policy 52 Green Infrastructure
- Core Policy 57 Ensuring High Quality Design and Place Shaping;
- Core Policy 58 Ensuring the Conservation of the Historic Environment;
- Core Policy 60 Sustainable Transport;
- Core Policy 61 Transport & Development;
- Core Policy 62 Development Impacts on the Transport Network;

- Core Policy 64 Demand Management

Neighbourhood Plan:

The Sutton Benger and Draycott Cerne Neighbourhood Development Plan 2020-2035 (SB&DCNDP) was made March 2025. The relevant policies from that plan are as follows:

- Policy SB4: Trees and Hedgerows
- Policy SB5: Biodiversity and Net Gain
- Policy SB7: Design
- Policy SB8: Heritage and Conservation
- Policy SB13: New Development and Highway Implications

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
- A Green & Blue Infrastructure Strategy for Wiltshire: Wiltshire's Natural Environment Plan 2022-2030
- Wiltshire Local Cycling and Walking Infrastructure Plan (LCWIP)
 - Active travel infrastructure design standards 2022
 - Active travel parking standards and design guide 2022

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) and would preserve or enhance the historic environment (CP 58)
- Whether the scheme would have an acceptable impact upon the reasonable living conditions of the adjoining occupants (CP 57)
- Whether there would be any harmful impacts upon protected species or priority habitats (CP 50)

CONSULTATION RESPONSES

WC Conservation: No objection

WC Ecology: Initial objection

WC Arboriculture: No objection

Sutton Benger Parish Council: Support

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 adjoining and nearby properties;
- A site notice displayed near the site;
- An advertisement placed in the local press.

These methods were used to inform interested parties and provide a period of 21 days for comments to be submitted.

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.

1no. representation was received with regard to the application(s), this querying the submitted ecology report and noting that protected species are present on the site.

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

The application relates to internal and external alterations to a listed building set within a designated Conservation Area. As the site lies within the established settlement of Sutton Benger (designated as a 'Large Village' in the Core Strategy), development is generally acceptable in principle, subject to detailed design and other technical matters and impacts arising.

Core Policies 1 (Settlement Strategy) and 2 (Delivery Strategy) of the WCS establish a hierarchy of settlements to guide where development should be focused, prioritising growth

in: Principal Settlements, Market Towns, Local Service Centres, and then Large and Small Villages – where development should be limited and respond to local needs. The Delivery Strategy (CP2) emphasises sustainable patterns of growth, reducing the need to travel and supporting local services. Together, CP1 and CP2 ensure that new development is strategically located, sustainable, and supports the character and function of Wiltshire's communities.

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.

Policy S4 relates to the principle of development within settlements and states that: *"1. Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework."* Limb 2 provides examples of circumstances when the benefits are likely to be substantially outweighed by adverse effects, but the text clarifies that this is not an exhaustive list.

Assessment and Conclusion

The proposal essentially seeks to support rural development and bring an under-used building back into active use. These aspirations are wholly positive and generally supported in local and national policy.

Alterations to an existing building are generally acceptable in principle. However, alterations to listed buildings are subject to particular scrutiny in terms of design and heritage impact, and in particular whether any harm arises as a result. The loss of listed buildings, and / or buildings within a designated conservation area, is generally resisted in principle. The assessment is subject to consideration of detailed design matters, alongside the balancing of harm against benefits arising. These matters are considered in turn below.

Design and Heritage Impact

Policy Context

Given the nature of the application proposal, matters of design, scale and appearance are interwoven with heritage impact considerations and this section thus considers these issues in concert.

Regarding matters of design, the National Planning Policy Framework (NPPF), particularly Section 14: Achieving well-designed places (DP1 – 4), stresses the importance of good design in development proposals. Good design should be an integral part of the planning process

and should ensure that developments complement their surroundings. The National Design Guide also builds on these aims.

Wiltshire Core Strategy Core Policy 57: Ensuring High Quality Design emphasises that all new developments, must demonstrate a high standard of design that enhances the local character of Wiltshire. Major developments should include detailed design statements that reflect the local context. The adopted Wiltshire Design Guide expands on policy CP57, and provides a framework to ensure that development is sensitive to the distinctive character of Wiltshire's built and natural environment.

WCS CP58 indicates that 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.

In terms of the listed building, 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. Section 72(1) of the Act requires the Council to pay special attention to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.

Section 16 of the NPPF 'Conserving and enhancing the historic environment' (HE1 – 10) sets out the Government's high-level policies concerning heritage and sustainable development.

Policy HE4 seeks to secure the conservation of heritage assets, these being an 'irreplaceable resource'. As such, proposals should: [inter alia] (a) 'main or secure a use consistent with their conservation, and (b) Avoid (or if that is not possible, minimise) harm to the significance of heritage assets, and instead conserve this significance. Limb (2) states that: *"Any harm to, or loss of, the significance of a designated heritage asset ... should have a clear and convincing justification in accordance with the policies in this chapter."*

Policy HE5 sets out the approach to assessing the significance of heritage assets and the potential effects from the proposal. HE5(2) advises that the assessment should determine whether the proposal would result in (i) a positive effect, (ii) no effect, (iii) harm arising – in which case the scale of harm should be identified, or (iv) total loss.

Policy HE6(1) requires that "substantial weight" is given to an asset's conservation "irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance. HE6(3) states that: *"Any harm to a designated heritage asset will be a matter of considerable importance and weight, which should be dealt with in accordance with paragraphs 4 to 6 of this policy."* Accordingly, HE6(4) states: *"Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal. Important public benefits can include securing the long-term reuse of a vacant or underused listed building, and enabling energy efficiency and low carbon heating measures to be employed."*

HE9 relates to Conservation Areas and requires that: *“(1) Development proposals within or affecting the significance of conservation areas should: (a) Retain and conserve buildings and other features which make a positive contribution to the character or appearance of the conservation area where possible; and (b) Consider the area’s special architectural or historic interest (as identified as part of the designation of the conservation area) in the design of development.”* HE9(2) advises that not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance.

Assessment

The proposals involve a relatively wide-ranging intervention to the existing building. This is partly given the nature of the building and the period of dis-use, and the Conservation Officer has reviewed the application proposal in detail and visited the site to fully assess the building and its significance in the context of the proposal. Following this, the Conservation Officer (CO) requested further detail regarding the proposed flooring in the front corner bay (former restaurant area) of the building – in particular the installation of York flagstone slabs to replace the modern flooring. In addition, information regarding the window detail was requested. Additional In response, the Applicant submitted a Construction Method Statement for both of these elements and these can be suitably controlled by way of condition.

The CO has confirmed that: *“... the significance of the building lies largely with its historic fabric and architecture - its form, layout and architectural expression/detailing and use of high-quality design materials which have significant aesthetic and architectural interest and which contribute to the character of the Area.”* In terms of other proposed works to the building, in large part – and in particular the removal of the modern flat roof section from the middle of the building, these are considered to be positive alterations. However, the CO also confirmed that there is some loss of historic fabric and as such there is a level of harm arising; this harm should be weighed against the public benefits arising (as below).

The CO has advised more generally that: *“The area proposed for removal are modern fabric of a poor quality design and materials. The removal of this fabric will better reveal the form of the original building and thus enhance significance of the building.”*

Finally, of note is the Parish Council’s support for the application, in bringing this disused building back into active use.

Conclusion

Whilst overall the proposed works are considered to be positive, there is some harm arising through the loss of some historic fabric, although this is considered to be minor. There is thus some conflict with Core Policy 58 (WCS), SB8 (SB&DCNDP) and Policy HE6(4) requires that this harm should be weighed against the public benefits resulting from the proposal – this balance is set out below.

Amenity

Policy Context

The National Planning Policy Framework (NPPF), stresses (L2(1)(d)(ii) and P3) that planning decisions should ensure developments provide a high standard of amenity for existing and future users.

Point vii of Core Policy 57 of the Wiltshire Core Strategy requires new development to have regard to the compatibility of adjoining buildings and uses, regard to the impact on the amenities of existing occupants, and ensure that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter).

The above policies include considering the impacts on privacy, light, outlook and noise for both existing and future occupants. These issues will be addressed in turn below.

Assessment

The proposal is for the alterations to an existing building(s) with no formal change of use being proposed and as such amenity issues and impacts are limited to those proposed changes. There are not considered to be any overlooking / loss of privacy issues, nor and loss of light or overshadowing. Any noise impacts arising would not go above and beyond what would occur through the lawful use of the building.

Conclusion

No neighbour objections have been received and for the above reasons, there are not considered to be any harmful amenity impacts arising which would warrant refusal of the application or lead to any conflict with Core Policy 57 or the NPPF.

Ecology and Biodiversity

Policy Context

NPPF Section 19 seeks to conserve and enhance the natural environment, with N6 supporting important habitats, species and sites of geodiversity value.

Core Policy 50 of the Wiltshire Core Strategy (WCS) seeks to conserve and enhance biodiversity across the county. It requires that development avoids harm to ecological assets and delivers some Biodiversity Net Gain (BNG) improvement, in line with the statutory requirements of the Environment Act 2021.

The Council's Green & Blue Infrastructure Strategy (2022–2030) sets out a strategic framework for protecting and enhancing Wiltshire's natural capital. It identifies priorities for habitat connectivity, ecosystem services, and nature recovery, and encourages development that contributes positively to these objectives.

Policy SB5 of the SB&DCNDP relates to biodiversity and net gain, and seeks the enhancement of such features.

Unless exempt, National policy requires a minimum of 10% Biodiversity Net Gain (BNG) for major developments, demonstrated via:

- Biodiversity Metric calculations
- Ecological assessments (e.g. PEAs, Phase 1 surveys, protected species surveys)

Assessment

As originally submitted, the application included an Ecological Survey which related to a previous proposal for the site. As a consequence, there was some confusion as regards to the issues and impacts arising from this specific application proposal, and was picked up on by the Ecology Officer and in the local representations made.

In response, an updated Ecological Assessment Report (EAR) was submitted, alongside a Construction Environmental Management Plan (CEMP) in order to avoid any pre-commencement condition on this.

The submitted EAR confirms that there is evidence of bats within the building(s), being common pipistrelle and also likelihood that the building(s) support a day roost for brown long-eared bats based on dropping evidence. However, it is clear from the plans, and also confirmed in the EAR, that: *“The proposed works will not impact either of the identified bat roosts as works are isolated internally, not impacting the loft voids, and to the single-storey rear flat roof extensions to be demolished was identified as holding ‘negligible potential’ for roosting bats.”*

Although the Ecology Officer has been re-consulted on these, a response has not been received within the agreed deadline for determination. The latest NPPF advises that local planning authorities should: *“Consult statutory or internal consultees only where it is necessary to do so. Decisions on development proposals should not be delayed in order to secure advice from a statutory or internal consultee beyond their statutory deadlines unless there is insufficient information to make the decision, there are public safety risks from proceeding without advice, or more detailed advice may enable an approval rather than a refusal”* (DM3(1)).

On the basis that the information initially requested by the Ecology Officer has been provided by the Applicant, it is not considered that there is now insufficient information to make the decision and there are no public safety risks arising from proceeding. As such, it would be reasonable to proceed to determine on the basis of compliance conditions being attached relating to that further information provided.

No external lighting is shown on the submitted plans the Ecological Assessment advises that: ‘Preferably, no net increase in external light fixtures will be installed’ (Section 4). It is therefore considered appropriate to require any details by way of Condition, if these are desired at any future point.

In terms of Biodiversity Net Gain, this application proposal is exempt from BNG, given that it meets the de minimis exemption criteria.

Conclusion

Based on the above, the application is not considered to give rise to any conflict with Core Policy 50 (WCS) or SB5 (SB&DCNDP).

PLANNING BALANCE AND CONCLUSION

At the heart of the NPPF, there is a presumption in favour of sustainable development requiring local planning authorities to approve development proposals that accord with an up-to-date development plan without delay (S3). Policy S4 advises that: *“Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework.”*

The principle of development is considered acceptable when assessed against the settlement strategy of the Wiltshire Core Strategy and the Sutton Benger and Draycott Cerne Neighbourhood Development Plan.

This section of the report considers the overall planning balance, weighing the identified benefits of the proposal against any harm arising (in line with Section 20 of the NPPF), in order to assess whether the development complies with the development plan when read as a whole, or whether other material considerations justify a departure.

The NPPF places great weight of the protection/conservation of heritage assets, as does adopted Core Policy 58 (WCS). Whilst the proposal results in heritage harm, this is limited and minor in extent and the overall scheme represents a benefit in heritage terms. HE6(4) requires that where harm arises, this should be: *“... weighed against any public benefits resulting from the proposal;”* which can include: securing the long-term reuse of a vacant or under-used listed building, and enabling energy efficiency. The proposal is compliant with relevant local and national planning policies in respect of supporting rural development and bringing this under-used building back into active use and it is noted that the Parish Council has offered its support to the application.

Thus, whilst there is some minor harm arising through the loss of some historic fabric, it is clear that the proposal also offers some distinct heritage benefit, not least the removal of the modern and detracting flat roof element from the central part of the building. On balance, and in the context of the advice set out in the NPPF, the harm arising is clearly and definitively outweighed by the public benefits arising through helping to secure a viable use for this building and the application thus accords with the NPPF in this regard.

There are no matters of design, residential amenity, ecology and biodiversity which would warrant refusal of the application or give rise to any policy conflicts, subject to the recommended conditions and any necessary mitigation measures.

Accordingly, the proposal is considered acceptable in planning terms and in accordance with the Wiltshire Core Strategy, the National Planning Policy Framework, and all other relevant material considerations.

RECOMMENDATION:

That Planning Permission be GRANTED, subject to conditions

1. 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 by the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved plans:
 - 786-3-00: Site Location Plan
 - 786-3-01 EX: Existing Site Plan
 - 786-3-02A EX ground floor plan
 - 786-3-03A EX first floor plan
 - 786-3-04A EX elevations
 - 786-3-05 EX: Existing Sections
 - 786-3-11A PR: Proposed Site Plan (22/05/2026)
 - 786-3-12B PR: Proposed Ground Floor Plan (22/05/2026)
 - 786-3-13A PR: Proposed First Floor Plan (22/05/2026)
 - 786-3-14B PR: Proposed Elevations (22/05/2026)
 - 786-3-15 PR: Proposed Courtyard Elevations
 - 786-3-16 PR: Proposed Street Scene Elevations
 - Window Details – Flush Fit Window Sections (21/05/2026)(received 25/03/2026 unless otherwise stated)

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

3. The development will be carried out in accordance with the Construction Environmental Management Plan (CEMP), prepared by ABR Ecology Limited and dated 28th September 2026, submitted in support of the application on 29/09/2026.

REASON: To ensure the development is undertaken in an acceptable manner, to minimise detrimental effects to the neighbouring amenities, the amenities of the area in general, detriment to the natural environment through the risks of pollution and dangers to highway safety, during the construction phase.

4. The development shall be carried out in strict accordance with the details set out in the Ecological Assessment Report, prepared by ABR Ecology Limited and dated 28th September 2026, submitted in support of the application on 29/09/2026, in particular Section 4 'Compensation, Mitigation and Enhancement Plan' and accompanying Appendix 1. This shall include, but not necessarily be limited to, the biodiversity enhancements for bats, nesting birds and hedgehogs.

REASON: To provide mitigation / enhancement for biodiversity.

5. No external light fixture or fitting shall 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. The approved lighting shall be installed and shall be maintained in accordance with the approved details and no additional external lighting shall be installed.

REASON: To avoid illumination of habitat used by bats and in the interests of the amenities of the area and to minimise unnecessary light spillage above and outside the development site.

6. The development will be carried out in strict accordance with the hereby approved Construction Method Statement (786-3) in terms of the installation of the flagstone floor in the front bay.

REASON: To ensure appropriate biodiversity mitigation and enhancement.

That Listed Building Consent be GRANTED, subject to conditions

1. The works for which Listed Building Consent is hereby granted shall be begun before the expiration of three years from the date of this consent.

REASON: To comply with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. The works hereby permitted shall be carried out in accordance with the following approved plans:
 - 786-3-00: Site Location Plan
 - 786-3-01 EX: Existing Site Plan
 - 786-3-02A EX ground floor plan
 - 786-3-03A EX first floor plan
 - 786-3-04A EX elevations
 - 786-3-05 EX: Existing Sections
 - 786-3-11A PR: Proposed Site Plan (22/05/2026)
 - 786-3-12B PR: Proposed Ground Floor Plan (22/05/2026)
 - 786-3-13A PR: Proposed First Floor Plan (22/05/2026)

- 786-3-14B PR: Proposed Elevations (22/05/2026)
 - 786-3-15 PR: Proposed Courtyard Elevations
 - 786-3-16 PR: Proposed Street Scene Elevations
 - Window Details – Flush Fit Window Sections (21/05/2026)
- (received 25/03/2026 unless otherwise stated)

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

3. The development will be carried out in strict accordance with the hereby approved Construction Method Statement (786-3) in terms of the installation of the flagstone floor in the front bay.

REASON: To ensure appropriate biodiversity mitigation and enhancement.

4. Within 3 months of the works being carried out, all adjoining surfaces which have been disturbed by the works (including brickwork, plaster and floor tiles) shall be made good with materials and finishes to match those of existing undisturbed areas surrounding the new opening.

REASON: In the interests of preserving the character and appearance of the listed building and its setting.

INFORMATIVES

Any alterations to the approved plans, brought about by compliance with Building Regulations or any other reason must first be agreed in writing with the Local Planning Authority before commencement of work.

The applicant is requested to note that this permission does not affect any private property rights and therefore does not authorise the carrying out of any work on land outside their control. If such works are required, it will be necessary for the applicant to obtain the landowners consent before such works commence. If you intend carrying out works in the vicinity of the site boundary, you are also advised that it may be expedient to seek your own advice with regard to the requirements of the Party Wall Act 1996.

There is a low risk that bats may occur at the development site. Many species of bat depend on buildings for roosting, with each having its own preferred type of roost. Most species roost in crevices such as under ridge tiles, behind roofing felt or in cavity walls and are therefore not often seen in the roof space. Bat roosts are protected all times by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (as amended) even when bats are temporarily absent because, being creatures of habit, they usually return to the same roost site every year. Planning permission for development does not provide a defence against prosecution under this legislation or substitute for the need to obtain a bat

licence if an offence is likely. If bats or evidence of bats is found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or the applicant is advised to follow the advice of a professional ecologist or to contact Natural England's Batline through the internet.

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. Suitable lighting to ensure dark foraging and commuting routes can be retained could be secured via condition.

The applicant should note that under the terms of the Wildlife and Countryside Act (1981) and the Conservation of Habitats and Species Regulations 2017 (as amended) it is an offence to disturb or harm any protected species including for example, breeding birds and reptiles. The protection offered to some species such as bats, extends beyond the individual animals to the places they use for shelter or resting. Please note that this consent does not override the statutory protection afforded to any such species. In the event that your proposals could potentially affect a protected species you should seek the advice of a suitably qualified and experienced ecologist and consider the need for a licence from Natural England prior to commencing works. Please see Natural England's website for further information on protected species.

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for development of land in England is deemed to have been granted subject to the condition (biodiversity gain condition) that development may not begin unless:

- (a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan, if one is required in respect of this permission would be Wiltshire Council.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. For further information on exempt developments please refer to:

<https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments>

Based on the information available this permission is considered to be one which will not require the approval of a biodiversity gain plan before development is begun because one or more of the statutory exemptions or transitional arrangements is considered to apply.