

Wiltshire Council Planning Consultation Response

24 December 2025

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Officer's Title: Planning Officer

Application No: PL/2025/07147
Change of use of land to form overflow car park and recreational field with associated works. Change of use of public house car park to pub garden. Change of use of farm shop brewery to café and erection of extension. Change of use of part of Spa Barn (Sui Generis) to include learning and non-residential institute (Use Class F1)
The Three Daggers and Hillside Cottage, Westbury Road, Edington, Westbury, Wiltshire, BA13 4PG

Please find following comments in respect of the above application(s).

Recommendations:

☒	Comment
☐	Support in principle subject to amendments to the scheme (as set out below)
☐	Support subject to conditions (as set out below)
☐	Object (for reasons set out below)
☐	No objections

Scope of comments: the following comments relate to the built historic environment.

Policy: From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Section 66 requires that **special regard** be given to the desirability of preserving or enhancing 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.

The NPPF outlines government policy, including its policy 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 214-216 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 should 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.

National Planning Practice Guidance provides guidance on interpreting the NPPF.

The Council's Core Strategy Policy CP58 'Ensuring the conservation of the historic environment' requires that "designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance."

The Council's Core Strategy CP 57: Ensuring high quality design requires a high quality of design in all new developments. Proposals are required to "demonstrate how the proposal will make a positive contribution to the character of Wiltshire through (amongst other things) "enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development" and "responding positively to the existing townscape and landscape features 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."

Historic England Advice Note 2 – Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for PP and LBC.

Site and assets considered: The site is land to the rear of The Daggers PH and affects the setting of Edington Conservation Area and the setting of a number of listed buildings.

Proposal: Change of use of land to form overflow car park and recreational field with associated works. Change of use of public house car park to pub garden. Change of use of farm shop brewery to café and erection of extension. Change of use of part of Spa Barn (Sui Generis) to include learning and non-residential institute (Use Class F1)

Relevant planning history: ENQ/2024/01290 - Change of use of land to form overflow car park, recreational field. Change of use of car park to pub garden. Use of brewery ground floor to cafe in Edington farm shop; W/82/00409/HIS - Change of use to recreation area (approved).

Issues: impact on the setting of neighbouring listed buildings, impact on the conservation area.

Information considered/provided: Paragraph 207 requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting. This should include sufficient information to provide a clear understanding of the significance of the heritage asset and its setting and the potential impact of any proposals on that significance. In this case, the application is accompanied by a "Heritage Statement" which provides sufficient information to understand the impact of the proposals and is proportionate to their scope. The requirements of the NPPF are therefore met in this respect.

However, paragraph 208 also provides for the local planning authority to make its own assessment of impact and the following heritage recommendations are offered on this basis.

Significance of assets and contribution of setting: The NPPF defines significance as the "value of a heritage asset to this and future generations because of its heritage interest. The interest may be **archaeological**, **architectural**, **artistic** or **historic**. Significance derives not only from a

heritage asset's physical presence, but also from its setting." Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place.

In this case the significance is found in the contribution made by the Three Daggers and its associated buildings to the architectural character of the hamlet, notable the western edge of the settlement. In addition the land acts as a rural backdrop to the hamlet and conservation area reinforcing its rural origins and the wider agricultural landscape.

Assessment: The site borders the western side of and is partially within Tinhead Conservation Area. In addition, the setting of listed buildings to the north of the site are affected by the proposed development.

The site forms part of the wider Three Daggers PH complex at the western end of the hamlet. The majority of the site lies outside but immediately adjacent to the conservation area and comprises the farm shop, the public house, the surrounding car park areas and the land to the north, which is currently a play ground and an open paddock. Due to the topography of the site, the Three Daggers PH and land to the north is set lower than the farm shop building.

The farm shop was built c.2011, replacing a former garage workshop. It is a 'L'-shaped timber framed structure with a ground floor and lower ground floor. The present arrangement has a farm shop/café on the 'ground'/upper floor and the micro-brewery and plant on the lower level. It stands opposite entrance to the site in the main car park, providing a physical break between the main tarmac area of parking and pub garden and a smaller gravelled parking area.

The site is with the setting of two listed buildings; Lambourne Cottage and No.10 Tinhead Road. Most of the site abuts the western boundary of Tinhead Conservation Area, however the Three Daggers and eastern carpark are located within the conservation area boundary. The larger No.12 Edington Conservation Area lies to the west and was designated c.1990s. Tinhead Conservation Area has no character appraisal.

My main concern relates to the further urbanisation of this western edge of the hamlet and the need to protect the landscape setting of the village and the conservation area.

As expressed at preapp stage, I have concerns at pushing a car park further within this landscape and consider that this would further urbanise the setting of the heritage assets. The strong preference would be for the car park to be more closely associated with the PH rather than acting as a detached facility.

Whilst there is no in principle objection to the extension of the farm shop, again I am concerned at further development intruding into the defined edge of the settlement and eroding the rural setting of the conservation area. There does also appear some capacity to extend the farm shop within the existing curtilage and this does not appear to have been explored.

In both cases I do consider that the significance of the site would be diminished by the proposals, which would not preserve and enhance the character and appearance of the conservation area. This would introduce further development and car parking which cannot be mitigated through landscaping; this would not retain the sense of openness of the green space or preserve the character and appearance of the conservation area.

Summary & conclusion: The NPPF confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It makes clear that any harm to a designated heritage asset requires clear and convincing justification.

As such, either amended plan are sought showing a far more condensed sensitive form of development, or equally I am happy for the planning officer to refuse the application on the basis of less than substantial harm; on the basis of moderate adverse change and that the proposed development would be a negative element within the setting that would erode the significance of the heritage assets to a clearly discernible extent.