

Steven Abbott

Proposed extension to replace an outbuilding at the rear
of the Carpenters Arms, East Street, Lacock

Planning Statement

For Addington Investments Ltd

February 2026



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1. INTRODUCTION

1.1. I act for Addington Investments Ltd and in particular Adrian Gott of Crooked Soley. He and some of his colleagues own The Carpenters Arms in Lacock.

1.2. I was instructed to produce this Planning Statement in February 2026. It supersedes the version dated October 2025.

1.3. There were applications for planning permission and listed building consent affecting that property then which were subsequently withdrawn (LPA refs: PL/2025/07409 and 07651).

1.4. This submission supports the two new applications for planning permission and listed building consent. It must be read in conjunction with both as part of the applications' documents.

1.5. The purpose of my Statement is to set out the robust case to prove why planning permission and listed building consent should be granted when all material considerations are considered.

1.6. My statement focuses on the outbuilding it is proposed to demolish and replace with a bespoke two storey infill extension.

1.7. I have visited the site, in daylight, on two occasions. I viewed the outbuilding inside and out and thus I am aware of its context within the site and physical make up.

1.8. I have also walked the streets and lanes of Lacock to gain a full appreciation of the village context and particularly its centre. It is a beautiful, very special place. It is appropriate that decisions on planning and listed

building applications are weighed carefully. This is the context within which the Council must make its decision.

1.9. I have over fifty continuous years of experience in the planning profession. I have worked for these three district councils: North Warwickshire, The Royal Borough of Windsor and Maidenhead; and Chorley (in Lancashire) as a policy officer and then in development management. All three authorities had hundreds of heritage assets between them, some of the highest order. I was involved with conservation areas repeatedly, including their creation. This pattern has continued since moving into my private practice in 1989 involving heritage assets in many parts of England.

1.10. I have been involved in determining and promoting schemes which protected and enhanced conservation areas and secured the long-term future of listed buildings in sustainable uses. I have worked with some very high calibre architects, urban designers and conservation experts. I am passionate about the merit of heritage assets globally and have a keen interest to this day and of creativity where change or interventions are justified.

1.11. I set out below what I consider the material considerations to be in this case.

2. MATERIAL CONSIDERATIONS

The Site, The Outbuilding and Its Surroundings

2.1. The Carpenters Arms (hereinafter referred to as The Carpenters) is located at the corner of Church Street and East Street. The subject outbuilding is located at the rear (south side) of the site. It is a narrow building which has a frontage onto East (Middle) Street.

2.2. The principal, grand elevation of The Carpenters fronts Church Street and its frontage has a uniformity in general terms.

2.3. The rear elevation is in stark contrast and has an unattractive combination of ad hoc extensions and the outbuilding with no uniformity. The street elevation of the outbuilding is a relatively narrow one behind the various styles and materials at the rear of The Carpenters. Its long side faces into a courtyard behind the existing uninspiring wrought iron gateway in East Street.

2.4. The courtyard is a run-down, non-descript space which (although visible from East Street currently by a glimpse through the wrought iron gates) makes no positive contribution to the listed building, the narrow East Street or the wider conservation area. It is not an important space in the street scene.

2.5. Other reports and assessments submitted with this application explain the planning history of the whole property and its poor condition. I have read the powerful and clear description of the outbuilding produced by C. John

Baumber¹. I support his view of the of the outbuilding which concurs with what I saw.

2.6. Illustrations, photographs, drawings and photomontages within the applications' submissions show the detail of the design and how it would fit in East Street.

2.7. The intervention being proposed draws from a vocabulary of the architecture and townscape in the centre of historic Lacock Village. Adrian Gott has been involved in an iterative process with the architects (HPA) responsible for the design. Adrian's aim is to secure the restoration and enhancement of The Carpenters as a fine, historic village inn which is viable as an ongoing business. He does so in the context of very difficult times for food and beverage premises and public houses in particular. The Heritage Statement² points out how many have been lost nationally in recent times and this is self-evident in Wiltshire too.

2.8. The design involves a well-considered vernacular style but in my opinion is one of many design types which could be used without harming either the setting of the listed building or the conservation area in which it sits.

2.9. In his response to the Applicant's pre-application submissions on behalf of the Council's Head of Development Management a Planning and Conservation Officer (Jeffrey Penfold) stated that:

"Given the works are relatively minor in their size / scale and retain the existing public house use class, the works are deemed acceptable in-

¹ Review of a Structure to the rear of The Carpenters Arms, August 2025 by C. John Baumber, C.Eng., F.I.Mech.E., B.Sc. Mech Eng, C. Dip A.F.

² Heritage Statement by Jessica Barrow BSc MSc IHBC for HPA Architects

principle and would not likely give rise to any detrimental impacts upon the vitality of the village nor result in unacceptable traffic congestion above and beyond the existing situation.

With regard to the appropriateness of the character of the works, it is not considered that as proposed, the resultant design is so out of keeping with that of the wider village context to warrant an in-principle reason for refusal.”³

2.10. I consider that the infilling of the space (including a new archway) from East Street is wholly appropriate in principle. It is a ‘natural’ intervention and reflects other juxtapositions in the village centre.

The Development Plan

2.11. Decisions on planning applications and listed building consent applications must follow long established legal and policy imperatives. One of the key parts of that approach is the development plan⁴. Decisions must be taken in accordance with it unless material considerations indicate otherwise.

2.12. This section will demonstrate why the proposed development I am focusing on is in accordance with the development plan.

³ The Principle/Sustainable Development section of the pre-application enquiry response letter from Wiltshire Council reference ENQ/2024/00409 dated 12 August 2024.

⁴ Paragraph 2 in the National Planning Policy Framework, 2024, Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990

2.13. The current Local Plan is the Wiltshire Core Strategy (WCS) adopted in 2015. It incorporates saved policies from the former District local plans where they were not replaced by the WCS and will continue to be saved until replaced as part of the Local Plan Review process.

2.14. The Local Plan Review is in hand and hearings into it were held last year (2025) Unfortunately, it now appears that the Local Plan Review will not be capable of being adopted until next year at the earliest⁵. I refer to its weight and content later.

The Local Plan – WCS (2015)

2.15. HPA Architects Design and Access Statement (DAS)⁶ sets out an overview of the relevant policies. This statement drills deeper into the policies of most importance to the applications before you. The order of the policies referred to in this section is the same as the WCS to assist the reader. They are not in order of their weight as material considerations.

2.16. Lacock is defined as a Small Village in Policy 11 – Spatial Strategy for the Corsham Community Area ⁷.

⁵ Local Plan Inspectors' letter of 22nd December 2025; Nic Thomas
Director – Planning, Economy and Regeneration reply of 30th January 2026; Wiltshire Local Plan
Examination web pages 3rd February, 2026 including Proposed Programme and appendix.

⁶ HPA Architects – Design and Access Statement, February 2026

⁷ Figure 5.6 in the WCS – Corsham Community Area

2.17. The proposals comply with the principle of Policy 36 (Economic Regeneration). The proposals involve the previously developed land within the heart of the village.

2.18. Because of its location in the centre of Lacock, a tourist attraction, The Carpenters provides accommodation for tourists as well as local people. Policy 39 supports such development in small villages such as Lacock.

2.19. The proposals are for the sensitive restoration and extension of The Carpenters to provide an upgrade of the facilities available and therefore in Lacock. Policy 40 also expressly supports such a development in principle as it is located at an existing inn in a small village – in itself a tourist attraction.

2.20. The same policy resists the loss of bedrooms in premises such as The Carpenters. The additional accommodation proposed lessens the risk of pressure for a change of use (not favoured by the Council) and the inn closing as has happened with thousands of public houses around the country including Wiltshire⁸. Every additional room helps the viability of the inn.

2.21. On a related point, the proposals must be considered in the context of Policy 49. This resists the loss of rural services and community facilities. Public houses are recognised as being part of those services/facilities and are protected. Proposals such as those for The Carpenters have the weight of support from that policy too as they are driven by the business imperative for The Applicant to have a viable going concern. It is inevitable that The Carpenters will fail without the critical mass it needs to survive in a very difficult market.

⁸ Paragraph 6.70 of the Wiltshire Core Strategy (Local Plan), 2015

2.22. The Applicant is working with HPA Architects on this project. HPA are a long-established practice with the range of skills and experience (including practical) required where a listed building in a conservation area is involved. The Applicant and they have approached their design work carefully (as always) to ensure that a high quality of design is maintained throughout. The brief is to deliver a Carpenters which is fit for purpose, has a high-quality design throughout and one which befits its Lacock village setting. This approach is consistent with Policy 57 in the WCS. The development would enhance The Carpenters undoubted sense of place, has drawn on the local context and would complement the listed building and special townscape in East Street. Criteria iii, iv vi, vii and xii of the policy are met.

2.23. Policy 58 is key as it is specifically concerned with ensuring the conservation of the historic environment. The proposals concern statutory heritage assets as listed in paragraph 6.136 in the WCS i.e. a listed building in a conservation area. The proposals are sensitive to the special characteristics of Lacock being one of those historic villages referred to in general terms in paragraph 6.137 in the WCS.

2.24. Conservation in planning was never intended to treat buildings or townscapes as museum pieces where no change was to be allowed. The restrictions are there to protect and enhance heritage assets. Custom and practice for at least 60 years has been to control carefully whilst facilitating enhancement. This includes new buildings, redevelopment and sensitive extensions. Where new developments happen, they are not necessarily vernacular in design or pastiche but can be modern and deliberately in contrast to their neighbours. Examples abound at international, national,

regional and local levels. Paragraph 6.138 in the WCS recognises this reality and desire. It notes that:

'Designation of a conservation area, listed building, or scheduled ancient monument does not preclude the possibility of new development and the Council is committed to working pragmatically with owners to find positive solutions which will allow adaptation of such buildings to reflect modern living aspirations. Such alterations will only be acceptable where they are consistent with the conservation of a heritage asset's significance.'

'Consequently, it is expected that development will be of the highest standard in order to maintain and enhance the quality of the area or building and be sensitive to its character and appearance. In considering applications for new development in such areas, the Council will seek to ensure that the form, scale, design and materials of new buildings are complementary to the historic context.'

2.25. Regarding the first part of the above extract, the Applicant is pursuing a scheme which is consistent with the characteristics of that part of the listed building involved in my focus (the rear) which, as I stated above, has a very different character (unattractive) when compared with the front and 'main' sides. The Applicant is being pragmatic and is liaising with your Council's conservation and heritage advisers. He is also taking advice from various professionals in his team including his architects, two specialist heritage advisers and me. We all support conservation and understand the importance of heritage assets and their settings.

2.26. As for the second part of the extract, I reiterate that the design is of the highest standard. This is because The Applicant has demanded a design that will maintain and enhance the quality of The Carpenters and the conservation area. It would be sensitive to its character and appearance. The form, scale, design and materials were carefully chosen to complement the historic context

2.27. Turning to the policy itself (58) the proposals comply with it as follows:

- They protect, conserve and enhance the historic environment
- The Carpenters will contribute towards social, cultural and economic benefits for Lacock.
- The Carpenters was a heritage asset at risk and was in a very poor state of repair before The Applicant started rescuing it ⁹. The proposals are a crucial part of the plan.
- As an aside, the gates onto East Street are not historic. They relate to a consent granted by the Local Planning Authority in 1986¹⁰.

2.28. To conclude on the adopted (current) development plan the Council should grant planning permission and listed building consent as the proposals are in accordance with its policies.

Neighbourhood Plan

⁹ Review of a Structure to the rear of The Carpenters Arms, August 2025 by C. John Baumber, C.Eng., F.I.Mech.E., B.Sc. Mech Eng, C. Dip A.F and Structural Appraisal by GSA – Graham Schofield CEng, MI Structural Engineers, MICE, MIEI

¹⁰ HPA Architect's Design and Access Statement, February 2026 including the elevations.

2.29. There is currently no Neighbourhood Plan for the village or environs¹¹

The Local Plan Review

2.30. Earlier in this Statement I have noted the status of the Local Plan Review at this time (February 2026) and the programme before its eventual adoption.

2.31. At this stage it only has limited weight for decision making.

2.32. As one would expect there are no significant changes planned for policy in Wiltshire insofar as the subject applications are concerned. However, for completeness I refer to the following salient policy points.

2.33. As now, Draft Policy 69 acknowledges that small villages such as Lacock are appropriate places for tourism accommodation so long (as in this case) they do not adversely impact on heritage assets.

2.34. Draft Policy 99 refers to conservation and the enhancement of the historic environment. As with the existing WCS policies the emerging one is based on the long standing premiss that development affecting heritage assets should conserve or enhance them (as is the case). The policy has terminology aligned to the NPPF and guidance (see below) and I comment as follows:

- In my opinion, there is no harm to the significance of the listed building or conservation area. However, even if it is argued that there are very localised theoretical harmful impacts, they are easily outweighed by the public benefits arising from the restoration and more appropriate extension of the listed building than the out of keeping outbuilding, yard

¹¹ Wiltshire Council Neighbourhood Planning Activity Map (Updated 29th January 2025)

and gates which exist now. In addition, The Carpenters is a major community and social asset in Lacock but the owners have to utilise the rear of the site more efficiently (and attractively) to increase the accommodation to survive in a very tough commercial context.

- The proposals comprise a regeneration project by maintaining The Carpenters and its use in an improved format for people now and future generations to enjoy.

2.35. Draft Policy 98 is the general design policy and again, there are no changes emerging which affect the proposals. In terms of the emerging policy's criteria, I can state that:

- A high standard of design is involved. The development would enhance local historic distinctiveness as explained by introducing a more appropriate extension and materials.
- The design responds very positively to the existing townscape in terms of the distinctive built form and appearance in all respects. It is a very sensitive but positive piece of infilling in a narrow street consistent with the existing buildings in the street.
- It makes better use of that part of The Carpenters site behind the main (original) building.
- There would be no adverse impacts on the residents of East Street. On the contrary the new build would enclose an outdoor space and modern gates of no merit. In its place would be a suitably designed, solid extension, an archway and timber gates. The existing outbuilding is

a flimsy one (of questionable historic value) with no contemporary insulation, including for noise.

- The proposed extension would enable access for immobile or disabled people whereas the existing layout and building does not.

2.36. From the above it can be seen that the proposals are compliant with the Local Plan Review albeit it only has limited weight. This adds weight to their compliance with the WCS.

The National Planning Policy Framework (NPPF) (2024)

2.37. The NPPF is a material consideration which must be considered in determining the applications¹². I set out the relevant policy paragraphs in this section.

2.38. I have demonstrated that the proposals are in accordance with the adopted and emerging development plans (although the latter has limited weight). As such, there is a presumption in favour of the development as stated in paragraph 11 c) in the NPPF.

2.39. Paragraph 39 requires the Council to work proactively with the Applicant to secure a development which will improve the economic, social and environmental conditions of the area. The Applicant and HPA have collaborated with the Council's officers from the outset and a dialogue

¹² Paragraph 2, NPPF, December 2024

continues. Decision makers are required to seek to approve applications for sustainable development (as in this case) where possible.

2.40. The Applicant has complied with paragraph 40 in the NPPF by engaging in the pre-application submission process. This was helpful and the Council's letter was comprehensive. Unfortunately, the Applicant and his team do not agree with the Conservation Officer's conclusion (albeit qualified). I address that matter later.

2.41. Section 16 in the NPPF is a main material consideration as it is about conserving and enhancing the historic environment.

2.42. The Applicant's investment in The Carpenters enables the conservation of this heritage asset in a way which can be enjoyed by existing and future generations and will contribute to their quality of life in a beautiful village. This is consistent with paragraph 202.

2.43. Regarding paragraph 207 and 208, the applications are supported by proportionate heritage assessments by the architects and heritage experts.

2.44. In the context of the subject applications paragraph 210 is a material consideration of significant weight for your decision-making. I must note the following here on it.

- Firstly, on 'a)' there is an undoubted acceptance by all parties of the desirability of sustaining and enhancing the significance of this heritage asset and maintaining it, consistent with its conservation.
- Secondly on 'b)', the positive contribution that the conservation of this heritage assets can make to Lacock Village as a sustainable

community including the economic viability of its parts is key (our emphasis)

- Third, on 'c)' the desirability of the development in making a positive contribution to local character and distinctiveness with the replacement of the discordant, flimsy outbuilding and unattractive yard, modern out of place gates: and by concealing elements of the rear elevation. All of which would be enhanced by the proposed extensions, archway and proposed timber gates.

2.45. From my own appraisal of the site and its surroundings with drawings to hand I believe that there is no harmful 'alteration or destruction' of The Carpenters including to its setting. However, despite that, clear and convincing submissions have been made from the architects and two heritage experts from different professions. As such, there is no conflict with policy paragraph 213.

2.46. This is not a case where 'substantial harm', as described in paragraph 214, will arise. Nevertheless, substantial public benefits arise both in terms of the robustness of The Carpenters as a publicly used business asset but also, and no less important, aesthetically. This is in accordance with paragraph 215.

2.47. All involved agree that the existing use is the optimum viable one (paragraph 215) in principle but in practice the undistinguished, dysfunctional outbuilding and unattractive yard and gates preclude it achieving its potential; or the quality and commercial threshold The Applicant believes is needed to be reached to ensure a stable future.

2.48. The Council's pre-application letter (see below) sought to offer an informal balanced judgement in accordance with paragraph 216. I urge the Council to make a balanced judgement on the formal applications bearing in mind that conservation areas are not a prohibition tool and that sensitive alterations and extensions to listed buildings go ahead globally and regardless of ownership. They commonly enhance the asset and setting for many reasons.

2.49. The applications are in accordance with paragraph 217 as they incorporate a fully detailed design of the proposed replacement extension.

2.50. Regarding paragraph 218, the Applicant has been very open and enabled the Council's conservation officer / consultant to access the site and outbuilding; and has revealed as much of it as possible without causing any collapse. The less than exciting truth about the outbuilding is set out in the various submissions which support the applications.

2.51. This not a case (such has been so in many schemes I have been involved in nationally) where the demolition opens up or maintains interesting aspects of a listed building or space in a conservation area and thus is an enhancement that way. The rear of The Carpenters is at best described as ad hoc or mediocre and at worst unattractive – my personal view. What is true is that the infilling proposed involves an intimate, human scale with vernacular features which reflect the humble character of East Street. This is an appropriate intervention and correct for that aspect. It chimes with paragraph 219.

2.52. Crucial to decision making on these applications is an acknowledgment that not all elements of the conservation area necessarily contribute to its

significance (paragraph 215). In this case at worst the 'less than substantial harm' involved does not affect the significance of the conservation area as a whole. This is true in terms of land use, scale and design.

2.53. In conclusion on Section 6, it can be seen that the proposals are in accordance with this most important part of the NPPF which is a key material consideration.

2.54. Section 12 is also significant as it relates to achieving well designed places.

2.55. Paragraph 131 is pertinent in that Lacock Village is a high quality, beautiful and sustainable place. Good design is essential to maintain its qualities. The Applicant has engaged with the Council's officers, the Parish Council, The National Trust, local members and neighbours.

2.56. Regarding paragraphs 132-135 I address the Wiltshire Design Guide¹³ below.

2.57. As the Applicant has painstakingly engaged with the local community and the Council's officers about design, the proposals should be looked on more favourably as a result (paragraph 137).

2.58. The proposals should be supported given paragraph 139 too. It states that significant weight (my emphasis) should be given to.:

- A development, like this, which reflects local design policies and government guidance on design, considering any local design

¹³ 'Wiltshire Design Guide – Shaping the future: My Place, Your Place, Our Place' LDA Design 2024

guidance and supplementary planning documents such as design guides and codes; and/or

- Its outstanding design quality which involves a higher level of sustainability than the current outbuilding and yard; and would help to raise the standard of design more generally.
- The scheme would fit in well within the overall form and layout of the East Street and the rest of the village centre.

2.59. In summary on Section 12, the proposals comply with it.

2.60. So, as with the development plan, the proposals are in accordance with the NPPF which must be considered in decision-making. This means that there are no policy reasons for resisting the proposals but many (as described above) which support approval.

Draft NPPF (December 2025)

2.61. Reference must be made to this document. Whilst it is not yet policy it is understood that it may well be published before decisions on the subject applications are made. This section refers to the draft policies of relevance.

2.62. The first point to note is that the national decision-making policies set out in the draft do not reflect a change in Government policy towards heritage or design matters. However, I offer the following observations to demonstrate that the proposals would not be in conflict with the policies once adopted (assuming that no changes are made on heritage or design after the consultation phase).

2.63. I look at heritage aspects first.

2.64. Draft Policy HE4 (securing the conservation and enhancement of heritage assets) would be met as:

- a. The use (historic village inn) would be maintained consistent with the conservation of The Carpenters and the Conservation Area. It would make a positive contribution to the local economy, local character and distinctiveness.
- b. The significant elements of the overall heritage asset would be kept and not harmed at all. This, with the proposed enhancements in East Street, would preserve and enhance the significance of the premises.

2.65. Draft policy HE5 (Assessing effects on heritage assets) is met as assessments of its significance are provided in the supporting documents produced by HPA Architects (the DAS and Heritage Statement) and by Mr Baumber's Review of August 2025. Notwithstanding these professional experts' submissions, the Applicant has paid close attention to this aspect from the outset and his plans show the proportionate sensitivity needed across his premises.

2.66. These proposals are supported by Draft Policy HE6 2 (Proposals affecting designated heritage assets) as they would have a **positive** effect on the Carpenters Arms and Conservation Area.

2.67. Draft Policy HE9 3 (Conservation areas) would be met as the proposals involve the preservation of those elements in the Conservation Aea which make a positive contribution i.e. excluding the outbuilding on East Street.

2.68. The policy emphasises in HE9 2 that 'not all elements of a conservation area will necessarily contribute to its significance'. This is the case with the outbuilding which obviously does not contribute positively.

2.69. Draft Policy HE11 (Loss or removal of heritage assets) is also relevant. The policy is met as:

- a. It is self-evident that the Applicant would proceed with the replacement to the outbuilding. His project is well advanced on site and he is awaiting approvals so he can proceed.
- b. Great detail of the outbuilding and its history have been shared with the Council. I am advised by HPA Architects that further record drawings and photographs will be shared prior to demolition in the event of consent being granted.

2.70. Substantial weight would be given under Draft Policy L2 1b (Making effective use of land) as the proposals make better use of an underutilised, untidy area behind The Carpenters into a viable and attractive one.

2.71. To conclude on Draft NPPF the proposals would accord with its national decision-making policies.

National Planning Practice Guidance (NPPG)

2.72. Although not policy by name, this Guidance is acknowledged as important for decision makers. It reinforces what I have illustrated above – that conservation is an active process of maintenance and managing

change. It requires a flexible and thoughtful approach to get the best out of assets and specifically cites listed buildings in everyday use as an example¹⁴.

2.73. It recognises that the best way to address the neglect and decay of listed buildings is to ensure that they remain in active use consistent with their conservation. This is precisely the case here. It goes on to state (most pertinently) that for such heritage assets to remain used and valued it is likely that sympathetic changes are required from time to time. This describes the situation at The Carpenters now where you have necessary sympathetic changes before you.

2.74. The approach taken to the assessment of the heritage assets – the Carpenters and the conservation area by the Applicant's team are consistent with NPPG. In short, a sensitive, consultative approach has been taken which is proportionate to the part of the site and building affected; as well as the spatial aspects of the area in the context of East Street within the conservation area.

2.75. Otherwise in NPPG it helpfully notes that whether a proposal would cause substantial harm is a judgment for the decision-maker having regard to the circumstances of the case and the policy in the NPPF. It notes that substantial harm is a high test and does not arise in many cases. In my opinion, it does not arise in this case as no part of the scheme negatively impacts on a key element of the special architectural or historical facets of The Carpenters¹⁵ or the Conservation Area.

¹⁴ Paragraph: 002 Reference ID: 18a-002-20190723

¹⁵ Paragraph: 018 Reference ID: 18a-018-20190723

2.76. In the same paragraph it observes that where partial demolition is concerned (as here) there may be no harm at all. This is my professional position on the matter.

2.77. The subject of the public benefit of the proposals is explored further in the other supporting assessments. NPPG summarises what they may be succinctly in a way which is important to note:

- 'sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long-term conservation'¹⁶

2.78. The proposals meet all three of those criteria.

2.79. My conclusion on NPPG is that the proposals are in accordance with the guidance issued and this adds further weight in favour of approval.

[The Wiltshire Design Guide – My Place, Your Place, Our Place, LDA Design 2024 \(WDG\)](#)

2.80. The WDG is a document which covers the whole County and is not specific about places or even all land uses. It has been primarily produced to address major housing and mixed-use developments.

¹⁶ Paragraph: 020 Reference ID: 18a-020-20190723

2.81. It draws from the National Model Design Code ¹⁷.

2.82. Despite the focus of the WDG, there are parts of relevance to the proposals.

2.83. The proposals are part of a restoration scheme which align well with the three golden threads in the WDG as follows

- The Carpenters' is a very long-established inn in Lacock Village. The strength of the local community and thus its wellbeing is enhanced by the maintenance of such facilities. The proposals are driven by the needs of The Carpenters to re-open and survive
- The Carpenters is located in a central location within the village and in walking and cycling distance of its residents and work locations. It is also a more sustainable location than one outside the settlement.
- It is in a village with three other public houses and must compete with them. The Applicant wishes to make its offer unique and the high-quality bedrooms and dining areas proposed are a key part of that offer.

2.84. The Applicant and HPA Architects have shown respect for and the enhancement of the intrinsic character and distinctiveness of Lacock Village (paragraph 3.2).

2.85. The restoration work, including the proposed infill extension is faithful to the appearance of East Street and other smaller frontages (paragraph 4.5.19). This is illustrated very well by the photomontages which support the

¹⁷ The National Model Design Code, MHLG 2021

applications¹⁸. These are realistic images which show how well the form, materials and grain of the proposed extensions would integrate in the narrow, mellow, street.

2.86. The detailing would not cause an adverse visual impact. Quite the opposite, it would enhance The Carpenters' rear aspect and the conservation area (paragraph 4.5.20).

2.87. I conclude that the proposals are in accordance with the WDG (albeit it was primarily aimed at other forms of development).

Draft National Design Guide – Planning Practice Guidance for beautiful, enduring and successful places¹⁹

2.88. As with the Draft NPPF this document is out to consultation at the time I am writing this Statement.

2.89. It can only have limited weight as a material consideration at this moment. However, there are elements in it which I should draw attention to.

Context

2.90. The proposals would accord with paragraph 40 as:

- the design is based on a sound understanding of the features of the Carpenters site and the Lacock village Conservation Area context.

¹⁸ Arcmedia photomontages, 2025

¹⁹ National Design Guide – Planning practice guidance for beautiful, enduring and successful places. MoHCLG consultation document, January 2026.

- The new development would integrate well with its East Street surroundings
- The design is clearly influenced by and would influence its context positively

Heritage

2.91. The proposals for the outbuilding area would accord with paragraph 46 under C2 (Value heritage, local history and culture). The design is absolutely a response to heritage, local history, and culture.

2.92. Paragraph 49 is also important. The proposals would extend the history of the context as a present-day sensitive intervention to meet requirements for accommodation at The Carpenters.

2.93. Paragraph 44 is of note. It states that well-designed places do not need to copy their surroundings in every way. It states that it is appropriate to introduce elements which reflect how we live today, to include innovation or change such as increased densities, and to incorporate new sustainable features or systems. HPA are better placed to detail how much more sustainable the new build would be compared to the outbuilding but it is obvious in general terms. I must also observe that the Applicant has been encouraged to take a conservative, vernacular route on design because of the heritage context and public opinion locally. As I stated above, many other forms of design, including innovative, could work.

2.94. In summary, I believe that the proposals meet the qualities promoted by the proposed Guidance.

3. OTHER INTERESTS OF ACKNOWLEDGED IMPORTANCE

Lacock Conservation Area Statement /Appraisal

3.1. The Council does not hold a statement or appraisal of the Conservation Area²⁰. The site is in the Lacock conservation area which has great character. The Carpenters is a feature within it. The rear of the premises are generally unattractive and the outbuilding does not contribute anything to its character or the conservation area. Indeed, it is an alien intrusion which is discordant.

²⁰ Planning Technical Services, Wiltshire Council October 2025

4. THE PRE APPLICATION SUBMISSION

4.1. The Applicant has complied with paragraph 40 in the NPPF by engaging in the pre-application submission process. Unfortunately, he and his team do not agree with the overall conclusion reached in the letter²¹.

4.2. The Conclusion was as follows:

‘CONCLUSION

Whilst broadly acceptable in respect of both the principle of the works in this sustainable location and the final design / visual impacts the works give rise to, the concerns raised by the Council’s conservation officer are both noted and deemed to outweigh any positive benefits the works provide. Said comments conclude on the basis that the proposed works would likely harm the setting of the rear of the Carpenters Arms and neighbouring listed buildings and harm the character and appearance of the Lacock Conservation Area.

As such, based on the information submitted with the preapplication enquiry it is not demonstrated that the proposed development is compliant with WCS policy CP 58.

Matters concerning the likely impacts upon neighbouring amenity must be further scrutinised by the applicant given they may result in an unacceptable relationship between the works and adjacent dwellings.

²¹ Letter from Jeffrey Penfold of Wiltshire Council to HPA Architects dated 12th August 2024 under reference: ENQ/2024/00409.

At this time, and without a significant amount of additional information to provide justification in line with the relevant policies as set out above, it is not possible to provide you with more definitive advice, however I trust the information is of assistance.'

4.3. It will be self-evident from the above that the Applicant's architects, heritage experts and I disagree with the conclusion that the development would be contrary with WCS Policy 58 for the reasons I have set out. I draw decision-makers' attention to the following:

- Pre-application enquiries are invaluable and I use that process regularly. However, they are informal and do not bind either party.
- The conclusion in the pre-application reply letter starts by stating that the proposals are broadly acceptable in respect of:
 - the principle of the works in this sustainable location
 - the final design/visual impacts the works give rise to positive benefits

4.4. However, the Conservation Officer states that the works would 'likely' harm the setting of the rear of The Carpenters, unspecified neighbouring listed buildings, the character and appearance of the Lacock Conservation Area. It was a subjective pre-application view from the Conservation Officer and not definitive (as the pre-application letter fairly states).

4.5. The opposite view is taken by The Applicant and his advisers including me. This is why the proposals have not been shelved as we all believe that the

scheme will improve the setting of the rear of The Carpenters and enhance the conservation area, notwithstanding all the acknowledged other positive public benefits

5. OVERALL CONCLUSIONS

5.1. I hope that this submission is helpful to everyone considering or being consulted on the applications.

5.2. I have explained at length (necessary in such a context) that you (the decision makers) should grant planning permission and approve listed building consent as the proposals are in accordance with national and your own Council's policies; national and local guidance.

5.3. The policies cited are, in law, material considerations which must be considered and are within the development plan (Local Plan) and the NPPF. There are no other matters which outweigh the development plan or NPPF in this case.

5.4. Ultimately, the decision involves a degree of subjectivity but in my opinion the balance between the merits of the proposals and policy/guidance should result in a clear conclusion in favour.

5.5. I have stated that I do not concur with the view that the proposals harm either heritage asset involved – The Carpenters and the Conservation Area. This includes the setting of the former. The proposals should be approved as being in accordance with the development plan and national policies.

5.6. I have explained the importance of the proposals to the future of The Carpenters as a business and its contribution to Lacock Village and environs in environmental, social and economic sustainability terms. No other interests of acknowledged importance are adversely affected. The only 'sticking point' at the pre-application stage was an opinion that this outbuilding of dubious heritage value has such importance that your Council should thwart the

proposals. This is even though the author of the pre-application letter does not object to the new development. I have drawn attention to the professional opinions of the architects (with considerable heritage experience and expertise), two heritage experts (one local), The Applicant (who is wholly invested in this challenging restoration scheme) and me. This project is also very important to the sustainability of the Applicant's business (The Carpenters). **The planning balance in this case is easily in favour of the proposals.**

5.7. I therefore respectfully request you to approve these well-considered and worthy applications.

Steven Abbott BSc (Hons) MRTPI

February 2026

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