

Supplementary response. Objection to: PL/2025/07147

1.0 Applicant's Response to Highways – Technical and Procedural Failures

1.1 The applicant's transport consultant (Miles White Transport Ltd, 27 January 2026) has submitted a response to the Highways Officer's consultation. This response does not address the concerns raised by Wiltshire Council Highways and contains significant methodological errors, unsupported assumptions, and policy misapplications.

1.2 The Highways Officer required the applicant to provide: pub parking demand data; marked-out parking geometry; temporal modelling of multi-use patterns; evidence that all uses can be accommodated; evidence that dangerous overflow parking will be eliminated. None of these requirements have been met.

1.3 Instead of responding to the Highways Officer's "optimum parking" methodology, the applicant switches to Wiltshire's "maximum parking standards", inflating the theoretical requirement to 107 spaces and then claiming that 91 spaces represent "85% of maximum". This is not the methodology used by the Highways Officer and is not accepted by Wiltshire Council.

1.4 The applicant still fails to provide any of the pub parking demand information requested. The Highways Officer stated: "the applicant needs to provide the relevant information to allow an assessment to be undertaken". The applicant provides no floor area data, no occupancy data, no peak-time modelling, and no cumulative impact assessment. The Transport Statement therefore remains incomplete.

1.5 The applicant relies heavily on speculative "linked trips" assumptions, claiming that visitors will use multiple facilities during a single stay. This is unsupported by evidence, contrary to TRICS methodology, and explicitly acknowledged by the applicant as impossible to quantify: "It is not possible to accurately calculate the effects..." This admission confirms that the applicant's parking justification is not evidence based.

1.6 The applicant has not provided the temporal modelling required by Highways. There is no assessment of peak time demand, staff/customer overlap, event day impacts, pub evening peaks, or cumulative use of the café, pub, conference space, B&B rooms, and MUGA.

1.7 The applicant claims that marking out the overflow car park increases capacity from 40 to 44 spaces. However, the submitted plan does not demonstrate that these spaces can be safely accommodated. No swept path analysis, turning head analysis, disabled parking provision, EV charging provision, lighting assessment, or drainage assessment is provided.

1.8 The applicant concludes that provision of 91 spaces "overcomes the Highway Officer's concerns". This is incorrect. The Highways Officer's primary concern was the absence of pub parking demand data: "I am not happy to accept the 71 spaces without an understanding of the impact of the public house demand." The applicant has still not provided this information. The Highways Officer's concerns therefore remain unresolved.

1.9 The applicant's response does not address the dangerous overflow parking identified by Highways. The proposal increases floor space and traffic generation without demonstrating that the new car park will eliminate existing hazards.

1.10 The Transport Statement remains incomplete and non-compliant with NPPF paragraph 111 and Wiltshire Core Strategy Policies CP60–CP64. The application cannot be lawfully determined until the missing information is provided.

1.11 The applicant's response reinforces the conclusion that the development fails to demonstrate safe and suitable access for all users and must be refused.

2.0 Applicant's Heritage Consultant Email – Rebuttal and Policy Analysis

2.1 An email submitted by the applicant's heritage consultant (Gregory Beale, 13 March 2026) has been published on the planning portal. This email is not a formal consultation response and does not carry statutory weight. It represents advocacy on behalf of the applicant and cannot override the professional assessment of Wiltshire Council's Senior Conservation Officer.

2.2 The Conservation Officer's response (24 December 2025) identifies moderate adverse change, confirms that the proposal would not preserve or enhance the conservation area, and explicitly states that refusal would be justified. Greg's email does not address these findings and contains multiple contradictions, unsupported assertions, and misapplications of heritage policy.

2.3 Greg acknowledges that the paddock: "forms part of the historic western edge to the older village... within the historic core." This supports the Conservation Officer's assessment that the land contributes to the rural setting and significance of the conservation area.

2.4 Greg further acknowledges that the paddock provides key public views: "provides a sense of openness... from the playground and the 3 Daggers PH... and reverse views from No.10." This confirms the sensitivity of the site and the importance of its openness.

2.5 Greg asserts that the paddock has developed a "semi-residential character", but provides no evidence to support this claim. The land remains undeveloped open space and is identified by the Conservation Officer as part of the rural backdrop to the hamlet.

2.6 Greg claims that the proposed car park will "retain openness" and "not compromise the conservation area". These assertions directly contradict the Conservation Officer's findings: "would not preserve and enhance the character and appearance of the conservation area." "cannot be mitigated through landscaping."

2.7 Greg's claim that the car park "does not encroach upon the rural landscape" is factually incorrect. The paddock is rural landscape, as confirmed by the Conservation Officer, and the proposed car park represents a significant urbanising intrusion into open countryside.

2.8 Greg attempts to justify further harm by referencing incremental development elsewhere in the village. This approach is contrary to NPPF paragraphs 199–200, which require great weight to be given to conservation and clear and convincing justification for any harm.

2.9 Greg's email does not address the Conservation Officer's identification of alternative, less harmful options, including the potential to extend the farm shop within its existing curtilage. This omission fails to meet the requirements of NPPF paragraph 208.

2.10 The applicant's heritage consultant's email does not alter the statutory heritage assessment. The Conservation Officer's professional conclusion remains: the proposal causes moderate adverse change; the proposal erodes significance; the proposal does not preserve or enhance the conservation area; refusal would be justified.

2.11 The heritage harm identified by the Conservation Officer is not overcome by the applicant's consultant's email. The proposal remains in conflict with: NPPF 199–208; Core Policy 58; Core Policy 57; s.66 and s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

2.12 The heritage evidence continues to support refusal.

2.13 Terminology and Mischaracterisation of the Site The applicant's heritage consultant repeatedly refers to the field north of the Three Daggers as a "paddock". This terminology is inaccurate and materially misleading. A paddock implies a small, enclosed, semi-domestic space with limited landscape function. In contrast, the field is a large, open, visually prominent area forming part of the rural setting of Tinhead Conservation Area and the historic western edge of the village. Its openness contributes directly to key public views, the character of the conservation area, and the setting of listed buildings. Mischaracterising the field as a paddock is an attempt to minimise its heritage sensitivity and downplay the urbanising impact of the proposed car park. The Conservation Officer's assessment correctly identifies the field as part of the rural backdrop whose openness and landscape contribution would be harmed by the development.

3.0 Archaeology – Comprehensive Updated Objection

3.1 Statutory and Policy Context

3.1.1 The application site lies within an area of high archaeological sensitivity identified in the Wiltshire Historic Environment Record (WHER). Relevant heritage assets include: the medieval settlement of Tunheda (Tinhead); the nationally significant Scheduled Monument of Edington Priory; multiple Grade II listed buildings; the historically recognised landscape associated with the Battle of Edington (AD 878).

3.1.2 Under NPPF paragraphs 194–195, applicants must describe the significance of heritage assets affected and provide sufficient information to assess the impact of development. The applicant has not met this requirement.

3.1.3 Core Policy 58 requires designated heritage assets and their settings to be conserved and, where appropriate, enhanced. The absence of adequate archaeological investigation prevents compliance with this policy.

3.2 Wiltshire Council Archaeologist – Formal Objection (2 January 2026)

3.2.1 Wiltshire Council's Assistant County Archaeologist, Neil Adam, issued a formal objection to the application. Key findings include: "the site is in an area of archaeological sensitivity."

3.2.2 Historic mapping shows no development on the majority of the site for at least 150 years, meaning any archaeological features present are likely to be well preserved.

3.2.3 Previous monitoring associated with small scale works does not reduce the risk: "the nature and scale of these developments were much smaller than the current application."

3.2.4 The Archaeologist requires: full geophysical survey of all undeveloped areas; submission of results to WCAS for review; possible trial trenching prior to determination.

3.2.5 These requirements are pre-determination. The application cannot be lawfully determined until they are completed.

3.3 Applicant's Gradiometer Survey – Coverage, Level, Limitations, and Omissions

Survey Coverage Failure

3.3.1 The gradiometer report confirms: Intended survey area: 0.96 ha; Actual area surveyed: 0.85 ha. This means 11.46% of the site was not surveyed.

3.3.2 Several unsurveyed areas lie within zones of archaeological potential, including: parts of the play area; sections adjacent to visible LiDAR features; areas closest to Tinhead Road; areas closest to the Three Daggers complex. This directly contradicts the County Archaeologist's requirement that all undeveloped areas be surveyed prior to determination.

Survey Level Failure

3.3.3 The survey undertaken was a Level 1 (prospection) survey, the lowest resolution category defined by the Europae Archaeologiae Consilium (EAC). Level 1 surveys are designed only to detect broad anomalies and cannot reliably identify: stone structures; monastic water management features; medieval settlement remains; battlefield archaeology; burials; features lacking magnetic contrast.

3.3.4 Historic England guidance confirms that Level 1 surveys are insufficient for determining planning applications in archaeologically sensitive areas and must be followed by higher resolution survey or trial trenching. The applicant has not undertaken any such work.

Positive Results Despite Wrong Method

3.3.5 Despite being the weakest and least appropriate method, the Level 1 survey still detected multiple anomalies of possible archaeology, including: short ditch sections; linear trends; pit like features; possible historic boundaries.

3.3.6 Early medieval battlefield archaeology is notoriously subtle and often invisible to low resolution magnetometry. Therefore, the fact that a Level 1 survey detected anomalies strongly

indicates that a more appropriate, higher resolution method would have produced meaningful, interpretable archaeological results.

Survey Admissions

3.3.7 The applicant's own report admits: "other archaeological features may exist that are not detectable through gradiometer survey.", "Inhumation burials are also difficult to identify.", "Stone walls... may not be visible.". These limitations directly affect the types of archaeology expected on this site.

Failure to Address LiDAR and Aerial Evidence

3.3.8 The applicant's survey does not address: the large circular feature visible in LiDAR; the internal indentations; the ditch alignments; the earthworks visible in 1947 RAF photography; battlefield archaeology; monastic water management features; medieval settlement features.

3.3.9 No trenching has been undertaken. No WCAS review has been provided. The application remains procedurally incomplete.

3.4 LiDAR and Aerial Photographic Evidence (Submitted February 2026)

3.4.1 High resolution LiDAR DSM 1m imagery reveals: substantial parallel ditch features; a large circular feature occupying ~25% of the field; three central indentations consistent with anthropogenic activity; landform modification in the northern part of the field.

3.4.2 RAF aerial photography (October 1947) corroborates these features, showing: cropmarks; earthworks; darker curvature consistent with the circular feature; raised landform consistent with historic water management or settlement activity.

3.4.3 These features are consistent with: medieval ponds; monastic water systems; settlement enclosures; roundhouse platforms; battlefield landscape features.

3.4.4 The applicant's geophysical survey does not analyse or explain these features.

3.5 Independent Expert Commentary – Conflict Archaeology (Sam Wilson- Time Team / Digging for Britain)

3.5.1 Conflict archaeologist Sam Wilson has confirmed to me: "there are some possible archaeological anomalies there and I'd have thought almost certainly there will be some sort of archaeological mitigation."

3.5.2 He further advises: "flagging potential association with the battle... might well flag it as something for them to think about."

3.5.3 He also confirms: "The results are what they are." This means: the anomalies are genuine; the survey does not clear the site; the County Archaeologist must independently verify the results; further investigation is required; mitigation (including trenching) is likely.

3.6 Independent Expert Advice on Required Archaeological Mitigation

3.6.1 In professional archaeological practice, mitigation at a site of this sensitivity would normally include: Higher resolution geophysical survey (Level 2 or Level 3 magnetometry) to refine the location, extent, and character of detected anomalies; Earth resistance survey to identify stone structures, monastic features, settlement platforms, and water management systems that Level 1 magnetometry cannot detect; Ground penetrating radar (GPR) to detect buried features, pits, graves, compacted ground from encampments, and structural remains associated with early medieval or monastic activity; LiDAR targeted trenching to investigate the large circular feature, ditch alignments, and earthworks visible in LiDAR DSM 1m and RAF 1947 aerial photography; Battlefield specific evaluation, including systematic metal detecting survey (professional, gridded), soil chemistry analysis, and targeted excavation to assess potential associations with the Battle of Edington AD 878.

3.6.2 Sam Wilson further advised that the potential battlefield association should be formally flagged to Wiltshire Council's heritage team, as this is a nationally significant consideration that must inform the mitigation strategy.

3.6.3 The applicant's Level 1 prospection survey is not an adequate or appropriate method for

assessing archaeology of this period and landscape. The required mitigation has not been undertaken, meaning the application remains procedurally incomplete and cannot be lawfully determined.

3.7 Battlefield Context – National Significance Ignored

3.7.1 The wider landscape is widely acknowledged as the location of the Battle of Edington AD 878, one of the most important battles in English history.

3.7.2 The applicant's archaeological submissions do not address battlefield potential.

3.7.3 Battlefield archaeology is protected under NPPF Section 16. The applicant has not met this requirement.

3.8 Procedural Defects

3.8.1 The applicant has not provided: full geophysical coverage; WCAS review; trial trenching; battlefield assessment; LiDAR interpretation; aerial photographic analysis; medieval settlement analysis; monastic landscape analysis.

3.8.2 The application is therefore procedurally incomplete and cannot be lawfully determined.

3.9 Conclusion – Archaeological Grounds for Refusal

3.9.1 The applicant used the wrong method, applied it incompletely, and still produced positive anomalies.

3.9.2 The correct methods (Level 2/3 magnetometry, resistivity, GPR, LiDAR targeted geophysics, and trial trenching) were not used.

3.9.3 The County Archaeologist's requirements were not met.

3.9.4 The application fails to comply with: NPPF 194–195; NPPF 199–200; NPPF 208; Core Policy 58; Historic England guidance.

3.9.5 The application is procedurally incomplete and cannot be lawfully determined.

3.9.6 The application must therefore be refused.

4.0 Residential Amenity & Public Protection – Noise, Lighting, Management and Procedural Failures

4.1 Introduction

4.1.1 The proposed development includes a Multi Use Games Area (MUGA) located in close proximity to residential properties. The facility introduces new sources of noise, activity, and potential disturbance into an otherwise quiet rural setting.

4.1.2 Wiltshire Council's Public Protection Officer has already confirmed that the application is missing essential information and cannot be assessed in its current form. The applicant's subsequent Noise Impact Assessment (NIA) does not resolve these deficiencies and contains material inaccuracies.

4.1.3 As a result, the application fails to comply with national and local policy requirements relating to residential amenity, noise pollution, and environmental protection.

4.2 Public Protection's Formal Consultation Response (18/02/2026)

4.2.1 The Senior Public Protection Officer identified multiple critical omissions in the original submission: No detailed MUGA drawings; No information on lighting; No stated hours of use; No enforcement or monitoring strategy; No Noise Impact Assessment; No mitigation proposals.

4.2.2 The Officer confirmed that the nearest residential properties lie only 36 metres from the proposed MUGA — a separation distance known to generate complaints from similar facilities.

4.2.3 Wiltshire Council has previously received complaints from residents living near other MUGAs relating to: ball impact noise; raised voices; prolonged evening use; anti-social behaviour.

4.2.4 The Officer required a full Noise Impact Assessment before any formal position could be

taken.

4.3 The Applicant's Noise Impact Assessment (June 2026) – Fundamental Errors

The applicant submitted a document titled: *Noise Impact Assessment – Proposed Artificial Grass Pitch (AGP), Three Daggers Edington Acoustic Consultants Ltd, 24/06/2026*. This document does not assess the proposed MUGA.

4.3.1 Wrong Facility Type The NIA models an Artificial Grass Pitch (AGP), not a MUGA. These are not interchangeable: AGPs use artificial turf → lower impact noise; MUGAs use hard surfaces → high impact noise; AGPs use rebound boards → damped noise; MUGAs use rigid metal fencing → sharp, intrusive noise; AGPs host organised sessions → predictable noise; MUGAs host informal play → unpredictable, louder noise. The NIA therefore assesses the wrong development.

4.3.2 Wrong Distances Public Protection states: “nearest noise sensitive dwellings are approximately 36m to the east.” The NIA claims: “nearest residential receivers... 70m north and 40m east.” This is factually incorrect. The NIA models noise at greater distances, artificially reducing predicted noise levels.

4.3.3 Wrong Noise Sources The NIA does not model: ball strikes on rigid MUGA fencing; basketball impacts; raised voices typical of MUGA use; hard surface football noise; reverberation within enclosed fencing; informal, unsupervised use; summer evening use; anti-social behaviour patterns. These are the primary noise sources of a MUGA.

4.3.4 Unsupported Assumptions The NIA states: “The court... will be restricted to daylight hours.” This is not stated anywhere in the planning application. It is an assumption, not a planning control.

4.3.5 No Lighting Assessment Public Protection required: assessment of lighting; hours of operation; amenity impacts from illumination. The NIA provides none of this.

4.4 Public Protection Requirements Not Met

The Officer required the NIA to include: activity noise modelling; ball impact noise modelling; raised voice assessment; fencing and surface details; lighting assessment; predicted noise levels at nearest receptors; mitigation measures. The submitted NIA fails to provide: correct distances; correct facility type; correct noise sources; correct receptor locations; any meaningful mitigation. Therefore, the NIA does not satisfy Public Protection's requirements.

4.5 Amenity Impacts – Noise, Lighting, Hours of Use, Management

4.5.1 Noise Impacts The proposed MUGA will generate: ball impact noise; shouting; group activity noise; hard surface impacts; reverberation within metal fencing. These noise sources are: impulsive; high frequency; intrusive; unpredictable; characteristic of anti-social behaviour. At 36 metres, these impacts are highly likely to cause disturbance.

4.5.1.1 Children using the existing playing field facilities already create noise from high frequency screaming above and beyond usual activities the facility was designed for. Moving facilities closer to residential homes will not decrease noise.

4.5.2 Lighting Impacts The application provides: no lighting design; no lux level modelling; no spill light assessment; no hours of illumination; no mitigation strategy. This is a procedural failure under NPPF 198(c).

4.5.3 Hours of Use The NIA assumes “daylight hours only” — but: the application does not state this; no condition is proposed; summer daylight extends past 21:00; informal use is likely; noise complaints are foreseeable.

4.5.4 Management and Enforcement The application provides: no management plan; no supervision strategy; no enforcement mechanism; no anti-social behaviour mitigation; no noise control measures. This is unacceptable for a facility located 36m from homes.

4.6 Policy Non-Compliance

The application fails to comply with: National Policy — NPPF 187; NPPF 198(a–c); Noise Policy Statement for England (NPSE); Planning Practice Guidance (PPG) – Noise; Wiltshire Core

Strategy — Core Policy 57; Core Policy 52.

4.7 Procedural Incompleteness

4.7.1 Public Protection has not issued a formal position because the applicant has not provided the required evidence. **4.7.2** The NIA does not assess the actual proposal. **4.7.3** The application is therefore procedurally incomplete and cannot be lawfully determined.

4.8 Conclusion – Amenity & Public Protection Grounds for Refusal

4.8.1 The applicant has submitted a Noise Impact Assessment for the wrong facility.

4.8.2 The NIA uses incorrect distances, incorrect assumptions, and incorrect noise sources.

4.8.3 The NIA does not assess the proposed MUGA.

4.8.4 The NIA does not meet Public Protection's requirements.

4.8.5 The application fails to comply with national and local policy.

4.8.6 The application is procedurally incomplete.

4.8.7 The application must therefore be refused on residential amenity and public protection grounds.

5.0 Residential Amenity, Event Noise, Alcohol Related Behaviour, and Intensification of Disturbance

5.1 Introduction The proposed development must be assessed not only on its stated uses, but also on its likely future uses, particularly where the scale, capacity and nature of the facilities indicate a shift toward event based commercial activity. Multiple elements of the proposal including the café extension, expanded outdoor seating, large parking provision, landscaped grounds, and recreational zones - strongly suggest that The Three Daggers site is being positioned to operate as a wedding and events venue, even though this is not declared in the application. This raises significant concerns regarding late night noise, music, amplified sound, crowd noise, alcohol related behaviour, and reflected noise impacting nearby residential properties.

5.2 Existing Disturbance Residents already experience a tolerable but noticeable amplitude of noise from the Three Daggers pub garden, the Hillside complex, and the existing playing field. These existing noise sources include raised voices, outdoor drinking noise, and music from marquees erected on the playing field for the provision of Parish Council permitted events. These impacts occur despite the current facilities being further away from residential properties than the proposed new layout.

5.3 Existing Charity Events – Music, Alcohol, and Late Night Operation The existing playing field is already used for Parish Council approved charity events, which include live music bands, pre recorded music, alcohol consumption, and late evening social activity. These events occur at least twice a year and already generate disturbance for nearby residents. The promotional material for the Edington Charity May Ball confirms that the plot hosts large scale, late night events involving: live music; dancing; alcohol; 'cash' games; operation until 1am. This is not hypothetical it is documented, advertised, communicated on social media and already happening.

5.4 Intensification of Event Noise Under the Proposed Development The proposed development relocates key noise generating uses significantly closer to homes, including: the new MUGA; expanded outdoor seating; the café extension; landscaped social areas; the BBQ hut; new parking areas. This represents a material intensification of noise sources in both proximity and acoustic impact. Charity events in temporary marquees are currently tolerated because of the nature despite the raised noise and lack of sound insulation, not the distance, the proposed layout would: bring event noise closer; increase its amplitude at receptors; increase its clarity due to reduced attenuation; increase disturbance levels; increase the likelihood of complaints.

5.5 Late Night Arrival and Departure Noise Events - especially weddings, charity balls, and private parties generate high intensity noise peaks because attendees arrive and depart in concentrated bursts. This includes: car doors slamming; engines starting; taxis arriving; groups talking loudly; shouting; alcohol related behaviour. These peaks typically occur late at night, often

between 22:00 and 00:00, and are among the most intrusive forms of event noise. The applicant has provided no assessment of arrival/departure noise, despite this being one of the most predictable and intrusive impacts.

5.6 Alcohol Related Behaviour – Predictable and Material Charity events, weddings, and private functions inevitably involve alcohol consumption. This is a predictable behavioural factor in planning terms. Alcohol increases: volume of speech; impulsive noise; shouting; laughter; inconsiderate behaviour. These impacts are well documented in environmental health literature and are material planning considerations. The applicant has provided: no alcohol related behaviour assessment; no event management plan; no dispersal strategy; no supervision plan; no noise management plan. This is a major omission. The proposed outdoor seating area next to the proposed cafe extension does not indicate it is exclusively for the use of the cafe and therefore late evening and night time use is inevitable. There is no restriction on the applicants hours of operation.

5.7 Noise Reflection from the Hillside – Amplification Toward Homes The café extension and expanded outdoor seating area are positioned against the rising hillside, creating a natural acoustic reflector. This will: amplify voices; project noise outward; increase clarity of sound; reduce natural attenuation; increase disturbance at residential receptors. This effect has not been assessed in the applicant's Noise Impact Assessment. Hillside guests using the outdoor facilities at night time can already be heard beyond The Weir.

5.8 MUGA Noise During Events At wedding venues and charity events, MUGAs and play areas are used as children's entertainment zones, often: during receptions; during speeches; during evening events; unsupervised; loudly. This creates: shouting; ball impact noise; group activity noise; unpredictable disturbance. The applicant's Noise Impact Assessment does not model this scenario.

5.9 Evidence of potential Event / Wedding Use A significant proportion of supportive comments originate from individuals with direct professional, managerial, or organisational connections to the applicant's business operations. This is not improper, but it means these submissions should be treated as interested party representations, not independent community views. Additionally, two supportive comments come from wedding industry persons, indicating that the proposal is being viewed as a development that will support or expand wedding venue operations. The site layout mirrors a wedding venue masterplan, including: large parking; landscaped grounds; outdoor seating; BBQ hut; children's play area; event friendly open spaces. The proximity to the Priory Church further contributes to this in addition to current Government consultation on changes to the law on marriage locations.

5.10 Parish Council Representation – Vested Interest and Procedural Concern The Parish Council's published representation states that the application was "lodged on behalf of both the Three Daggers and the Parish Council" and that the Parish Council "has an interest in it.". However, the formal planning application is submitted solely in the name of the private company operating the Three Daggers. The Parish Council is not listed as an applicant, co-applicant, landowner applicant, or agent applicant. This discrepancy raises a material procedural concern. If the Parish Council considers itself a joint beneficiary or co-applicant, this should have been formally declared in the application documentation. If it is not a joint applicant, then its published statement incorrectly describes its role. Either scenario results in a conflict of role, because the Parish Council is both: a beneficiary of the proposal, and a statutory consultee expected to provide an independent view. The Parish Council's support was also submitted before revised plans and updated assessments were published. No further comment has been provided. For these reasons, the Parish Council's representation should be given limited weight, recognising that it reflects the interests of a vested party, not the wider community.

5.11 Policy Breaches The intensification of event noise breaches: NPPF 187; NPPF 198(a–b); NPSE; PPG – Noise; Core Policy 57; Core Policy 52. None of these impacts have been assessed or mitigated.

5.12 Conclusion – Event Noise Requires Refusal Residents already experience disturbance from existing charity events, including the charity balls. The proposed development moves noise sources closer, increases capacity, and increases the likelihood of more frequent events. The

applicant has not assessed or mitigated any of these impacts. The application fails to comply with national and local policy and is procedurally incomplete. The application must therefore be refused on amenity, noise, governance, and public protection grounds.

6.0 Weight of Supportive Comments – Interested-Party Influence

6.1 A review of the published supportive comments shows that a substantial proportion originate from individuals with direct professional, managerial, commercial, or organisational connections to the applicant's business operations. The analysis was provided to developmentmanagement@wiltshire.gov.uk on 14/02/2026.

6.2 This is not improper, and such individuals are entitled to submit representations. However, in planning terms, these comments must be treated as interested party submissions, not independent expressions of wider community support.

6.3 The supportive comments include submissions from people who are publicly connected to: the applicant's hospitality business (pub, rooms, catering, operations); the applicant's commercial entities and associated companies; organisations that supply or promote wedding related services; events historically supported or facilitated by the applicant or Parish Council.

6.4 These connections are all publicly documented through business websites, Companies House records, LinkedIn profiles, Wiltshire Council's own Approved Venues register, and publicly available wedding industry listings.

6.5 The presence of such a large cluster of supportive comments from individuals with clear organisational ties to the applicant demonstrates that the volume of support does not represent independent community sentiment. It reflects the views of those with a vested interest in the applicant's commercial operations.

6.6 In contrast, objections come from unconnected local residents who will be directly affected by: increased noise; late night disturbance; intensified event activity; expanded commercial operations; increased traffic; loss of rural amenity. These are the impacts that planning policy requires the Local Planning Authority to prioritise.

6.7 For these reasons, the supportive comments should be given limited and proportionate weight, recognising that they do not represent a broad cross section of the community, but rather a group with direct links to the applicant's business interests.

6.8 This approach is consistent with the principles of transparency and fairness in local government decision making, where the source and nature of representations are relevant to assessing their weight.

7.0 Ecology & Biodiversity Net Gain – Critical Legal and Technical Failings

7.1 Introduction The applicant has submitted: an Ecological Impact Assessment (EclA) dated 17 November 2025; a Biodiversity Net Gain (BNG) Statement dated June 2026; a BNG Condition Assessment using the Statutory Biodiversity Metric v1.0.4. These documents contain major omissions, contradictions, expired survey data, and mathematically implausible BNG uplift claims. Most critically, they fail to lawfully address the documented bat roosts in the farm shop — the very building to which the proposed café extension will be physically attached. The Local Planning Authority cannot lawfully approve the application on the basis of the ecological information submitted.

7.2 Documented Bat Roosts Directly Affected by the Development The EclA confirms two active day roosts in the farm shop: "A single soprano pipistrelle bat emerged..." "A single bat (likely *Pipistrellus* sp.) emerged..." It also records a third possible roost on the northern elevation. These roosts are located exactly where the café extension will be built, meaning the development will: obstruct roost entrances; remove roosting features; alter microclimate; block flight lines; increase noise, heat, and lighting. None of these impacts are assessed.

7.3 High Suitability Roosting Features Across the Entire Elevation The EclA states: "All wavy edge boards at the western, eastern and northern aspects were considered suitable to support

roosting bats..." These boards — with access gaps behind and between them — are high value bat habitat. The extension will physically cover these boards. The EclA does not assess this loss.

7.4 Winter Bat Use Cannot Be Ruled Out — But Mitigation Contradicts This The EclA states: "The use of the identified PRFs by wintering bats... cannot be ruled out..." Yet the mitigation table claims: "Works will be timed to be completed outside of the wintering period... If not, works will be carried out in summer." This is not lawful. If winter use cannot be ruled out, works cannot proceed in winter or summer without a licence. No licence pathway is provided. This is a fatal legal flaw.

7.5 The Pizza Oven Flue Is Acknowledged — But Not Assessed The EclA confirms: "A new wood fire oven flue adjacent to the structure's western elevation." But the bat assessment contains no analysis of: heat plume; smoke; odour; night time operation; proximity to roost entrances. This is a direct breach of Bat Conservation Trust guidance.

7.6 Mitigation Measures Are Physically Impossible The EclA proposes: "A 1m buffer around each identified roost access point will be maintained..." This is impossible. The café extension is being built directly against the roosting elevation. A 1m buffer cannot physically exist. This proves the mitigation is theoretical, not deliverable.

7.7 Lighting, Noise, Heat, and Human Activity Are Not Assessed The BNG Statement confirms: new outdoor seating; reinforced grass parking; vehicular access; a new flue; increased evening activity potential. Yet the EclA provides no assessment of: lighting spill; noise disturbance; heat from the flue; odour displacement; increased footfall; increased vehicle movement; late-evening use. These are mandatory considerations under Natural England guidance.

7.8 Bat Survey Timing Is Invalid The EclA confirms: "Three Bat Emergence surveys undertaken between August and September 2025." This is outside the optimal seasonal window for: roost characterisation; maternity roost detection; transitional roost detection; winter roost assessment. The EclA itself admits winter use cannot be ruled out — yet no winter survey was undertaken. The survey is non-compliant with Bat Conservation Trust guidelines.

7.9 Survey Validity Has Expired The BNG Statement confirms additional surveys on: "28th Feb 2025 and 19th May 2026." This means: the bat survey is now over one year old; the validity window has expired; the ecological baseline is no longer current; the LPA cannot lawfully rely on it. This alone prevents determination.

7.10 BNG Calculations Are Implausible and Procedurally Invalid The new BNG submission claims: Area Habitat: +1.35 units; Hedgerow: +1307.34 units. A hedgerow uplift of +1307 units on a small rural site is mathematically implausible and indicates: inflated condition scores; misclassified habitat parcels; inclusion of ornamental hedgerow as "native"; inclusion of reinforced parking as "other neutral grassland"; inclusion of land not affected by the development; assumptions of perfect establishment and zero losses. This is not a credible BNG calculation.

7.11 BNG Cannot Offset Impacts on European Protected Species BNG is about habitat units, not species protection. BNG cannot legally "cancel out" impacts on bat roosts. Yet the BNG Statement: does not mention bat roosts; does not assess bat disturbance; does not assess roost obstruction; does not assess lighting or noise; does not assess the flue; does not assess evening use. BNG cannot be used to justify "no long-term negative effects" when bat impacts have not been assessed.

7.12 Inclusion of Unaffected Land Invalidates the BNG Baseline The BNG Statement admits: "The southern section has been included... however, as no works are proposed within this area... it has not been considered within the EclA." Including unaffected land to inflate baseline or uplift is a known BNG manipulation tactic and is not permitted under the Statutory Metric. This invalidates the BNG calculation.

7.13 Legal Consequences Under the Conservation of Habitats and Species Regulations 2017, bats are a European Protected Species. Planning authorities must have: seasonally valid surveys; complete assessments; workable mitigation; lawful timing proposals; accurate roost impact analysis. The ecological submissions fail on every requirement. Approving the application would expose the Council to judicial review.

7.14 Combined Ecology + BNG Conclusion The EclA and BNG documents together prove:

documented bat roosts exist in the farm shop; the extension directly affects these roosts; the flue is unassessed; habitat change is unassessed; winter use is unassessed; lighting and noise are unassessed; mitigation is impossible to implement; survey timing is invalid; survey validity has expired; BNG uplift is implausible; BNG baseline is manipulated; BNG does not address bat impacts. The application cannot lawfully be approved.

8.0 Highways, Parking, Obstruction & Road Safety – FOI Evidence and Parish Council Survey Questions

8.1 Summary The applicant claims that the proposed development is needed to address “parking problems” and “safety concerns” around the Three Daggers and the B3098. However, formal FOI/EIR evidence from Wiltshire Council and Wiltshire Police, combined with the questions published in the Parish Council’s July 2026 B3098 Traffic Safety Survey, demonstrate that: No parking problem exists; No obstruction problem exists; No enforcement history exists; No complaints have ever been logged; No remedial works have ever been required. But the Parish Council’s own survey questions show long standing perceived road safety concerns — not parking concerns. And Wiltshire Police records show a pattern of unsafe driving offences on the B3098. The proposed development would increase traffic and visitor numbers at a location already recognised as hazardous. The applicant’s justification is therefore factually unsupported and cannot be relied upon.

8.2 Wiltshire Council FOI – No Parking or Obstruction Issues Recorded Wiltshire Council’s EIR response (CAS-7101) states: “The council does not hold the information you requested... There are no parking restrictions at the location, and the Council is not able to enforce pavement parking or obstructions. We do not hold records that differentiate between normal wear and specific abnormal damage caused by vehicular use.” This confirms: No complaints have ever been made about parking at the Three Daggers; No enforcement has ever been taken; No site attendance has ever occurred; No obstruction has ever been logged; No damage has ever been recorded. The claimed “parking problem” is not evidenced anywhere in the Council’s records.

8.3 Wiltshire Police FOI – No Parking Enforcement, but Clear Road Safety Issues Wiltshire Police’s FOI response (FOI 2026/044) confirms: No recorded incidents of pavement parking or obstruction on the B3098 in Edington; No enforcement actions relating to obstruction or parking; No police attendance for parking-related issues. However, the Police FOI reveals a pattern of road safety offences on the B3098: Speeding (multiple years); Careless driving; Driving without due care and attention; Driving other than in accordance with a licence; No insurance; No MOT. These offences occurred within the parish boundary, including the stretch of road serving the Three Daggers. This demonstrates that: the B3098 already experiences unsafe driving behaviour; enforcement has been required for serious offences; the road environment is sensitive; increasing traffic volumes would increase risk, not reduce it.

8.4 Parish Council’s July 2026 Survey Questions Confirm Long Standing Perceived Safety Concerns The Parish Council’s survey opens with: “The issues of speeding, pedestrian safety and traffic levels on the B3098 have been a cause of concern for many years...” This wording is important. “Concerns for many years” does not mean “evidence for many years.” If these concerns truly existed for many years, it is reasonable to ask why: no formal Highways action was taken; no TRO applications were made; no speed limit review was initiated; no pedestrian safety schemes were pursued; no traffic calming proposals were submitted; no complaints were ever logged with Wiltshire Council or Wiltshire Police. The FOI evidence confirms none of these actions occurred. This strongly suggests the concerns may be perception rather than documented reality.

8.5 The Survey Questions Reinforce This Interpretation The Parish Council’s survey asks residents about: how safe they feel; whether vehicles appear to exceed the speed limit; whether they avoid the road due to safety concerns; what measures they think might help. These are subjective questions, not objective measurements. The survey is therefore: a perception gathering exercise; not an evidence based safety audit; not a traffic engineering assessment; not a Highways led intervention. Crucially: The survey does not ask a single question about parking problems. This is a material planning fact.

8.6 The Survey Area Is the B3098 Through the Village — Not the Three Daggers Site The

survey is titled: “B3098 Traffic Safety Survey – July 2026.” It is a village wide road safety consultation, not a consultation about: the Three Daggers; the farm shop; the proposed extension; the proposed car park; commercial activity; visitor numbers. The survey is about the public highway, not the private landholding. This distinction is essential.

8.7 Road Safety Concerns Do Not Justify Increasing Traffic Volume Even if residents feel unsafe, the correct planning response is: Reduce exposure to risk, not increase it. If the B3098 is perceived as unsafe, then increasing: visitor numbers; vehicle movements; turning movements; pedestrian crossings; evening activity; conflict between vehicles and pedestrians; ...would worsen the perceived problem, not solve it. Perception of danger cannot justify a development that objectively increases danger.

8.8 No Evidence of Damage, Verge Erosion, or Highway Remedial Works Wiltshire Council confirmed: “We do not hold records that differentiate between normal wear and specific abnormal damage caused by vehicular use.” This means: No verge reinstatement has ever been required; No bollard replacement has ever been required; No pavement repair has ever been required; No signage replacement has ever been required; No delegated works to contractors or landowners have ever occurred. If parking around the Three Daggers were genuinely problematic, damage would be visible in the records. It is not.

8.9 Planning Consequence – The Justification for the Development Falls Away Because: the applicant’s claimed parking problem is not evidenced; the Parish Council’s own survey questions focus entirely on road safety; no statutory body has ever recorded a parking issue; no enforcement has ever occurred; no complaints have ever been logged; but the Police FOI shows real road safety risks; and the Parish Council’s survey confirms long standing perceived safety concerns; ... the proposed development cannot be justified on highways or safety grounds. Increasing traffic at a location with documented unsafe driving behaviour is not safe, not justified, and not supported by evidence.

8.10 Final Conclusion The FOI evidence from Wiltshire Council and Wiltshire Police proves: no documented -parking problem exists; no obstruction problem exists; no enforcement history exists; no remedial works have ever been required; no complaints have ever been made; but the B3098 has a documented history of unsafe driving offences; and the Parish Council’s own survey questions confirm long standing perceived road safety concerns; bringing more vehicles and visitors into this location will increase risk. The claimed parking issues are unsubstantiated, and the proposal would worsen road safety, not improve it. The application must therefore be refused on highways, safety, transparency, and procedural grounds.

9.0 Overall Conclusion

Across Highways, Heritage, Archaeology, Residential Amenity, Ecology, Biodiversity Net Gain, and Road Safety, the application is procedurally incomplete, evidence deficient, and in conflict with national and local policy. The cumulative failures — including missing pre determination archaeological work, inadequate highways and parking justification, unassessed heritage harm, invalid ecological surveys and mitigation, and unmodelled amenity impacts — justify refusal. The application cannot be lawfully determined in its current form and must therefore be refused.