

Wiltshire Council Planning Consultation Response

21 July 2026

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Wiltshire Council Conservation (Central)

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Officer's Title: Senior 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:

	No comment
X	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.

National Policy and guidance: 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 (PP) require that special regard be given to the desirability of preserving or enhancing designated heritage assets, 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 214-16 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.

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.

Historic England's "Conservation Principles" provides policy and guidance for the "sustainable management of the historic environment". Additional guidance is also contained within their publications:

- Historic Environment Good Practice Planning Advice Note 2 – Managing Significance in Decision-Taking in the Historic Environment (2015)
- Historic Environment Good Practice Planning Advice Note 3 – The Setting of Heritage Assets (2nd edition)

The following points are taken from the Historic England document "The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3" (HE GPA3) that are considered to be particularly relevant:

HE GPA3 Part 1:

"The NPPF makes it clear that the setting of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset."

"The extent and importance of setting is often expressed by reference to visual considerations. ...views of or from an asset will play an important part..."

"While setting can be mapped in the context of an individual application or proposal, it cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time."

"The importance lies in what the setting contributes to the significance of the heritage asset or to the ability to appreciate that significance."

Other HE publications

HE GPAs and HEANs [The Planning System | Historic England](#)

Historic England Advice Note 18 – Adapting Historic Buildings for Energy and Carbon Efficiency provides specific advice relevant to development of this nature.

Local Policy: 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." It is also required that distinctive elements of Wiltshire's historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced.

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."

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: Refer to Case Officer report as the planning history for the property is extensive.

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 applications are 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 (as appropriate): 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.

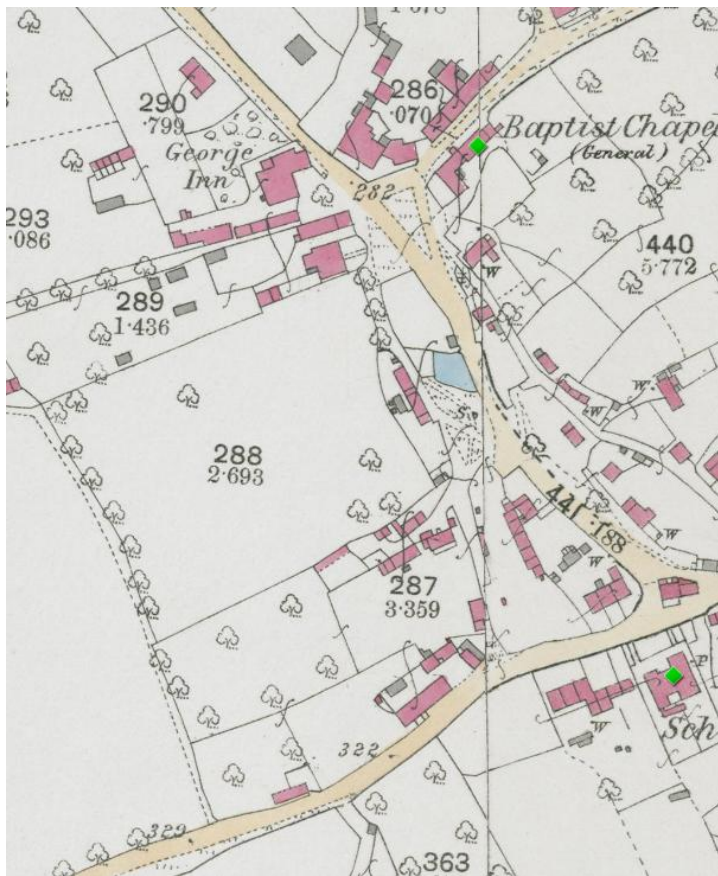
The interest may be architectural, or historic as set out in the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 S 1.

In this case, the application site forms part of the conservation area, and the wider setting of a listed building, in particular the group of buildings that included the George Inn to the north of the site. The Three Daggers is a small, village public house that sits at the edge of the historic settlement and would have formed one of the first buildings when approaching from the west. The scale and form of the main building relates to the scale of the built form within the village, though historically was part of a bigger complex of buildings that were to the north of the main pub.

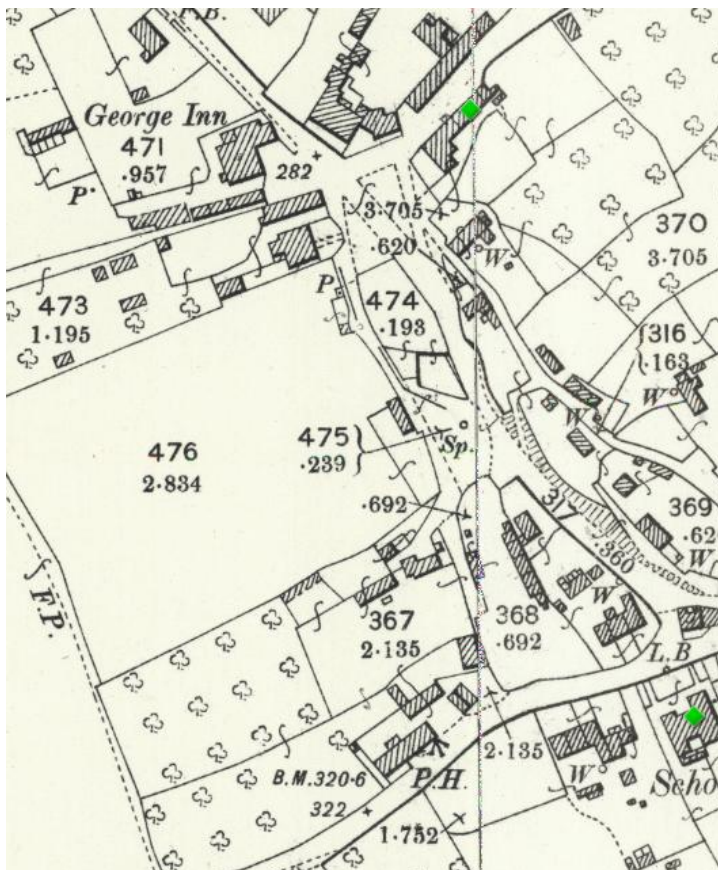
The setting of the Three Daggers has change in the C21 with the demolition of the small garage building to the west of the group of buildings that formed the pub complex, and the replacement with a large barn inspired building that now houses the café/ farm shop and brewery. To support this, the surrounding landscape has been altered to create additional parking and spaces. These works have changed the historic boundary lines but introduced a more urban setting for the pub with the formation of footpaths with curbs, and a wider vehicle access with wider vision splays. Whilst the boundary of this new development has been formed with hedge, there are a regular placement of trees which responded to a more organised development, rather than the ad-hoc grouping of trees which can be seen on the opposite side of the road. This regularity contributes to the urban nature of the development.

There are glimpsed views through the development to the development along Tinhead Road. The historic OS maps show that there was development to the north of the pub, with a mix of boundaries. It was common for pubs to be a supporting function of other trades and services, which resulted in a more 'complex' of buildings, including facilities such as stables, outbuildings, etc. Public Houses also offered limited services, unlike an Inn, (such as George Inn, now residential dwelling) which would have offered accommodation, stables/ horses and food. This difference can be seen on the historic maps with the buildings within the same ownership.

The Three Daggers offers a positive contribution to the character of the conservation area, whose boundary closely follows the linear built form development, rather than recognising the now lost outbuildings and structures that would have supported many of the remaining buildings.



1st Ed. OS Map 1844-1888



2nd Ed. OS Map 1894-1903

The property was subject to a large rear extension, and the removal of the painted render finished as part of the major refurbishment works completed between 2009 – 2011, together with a number of wider changes, including the erection of the stretch tent, lean-to roof and landscaping works to the BBQ hut (consented 2022). Whilst the individual changes are considered acceptable, it is important to consider the incremental impacts of the small development undertaken in recent years.

Assessment: The proposed scheme looks at several different elements, and these will be broken down to allow for an individual assessment of each element. However, whilst individual elements may not result in harm, an accumulation of works, including consideration of previous works, can result in harm. The NPPF recognises that where harm has been identified, this could be outweighed by public benefits. This planning balance is undertaken by the Case Officer, but any heritage benefits will also be recognised and considered.

The advice below is additional advice from the original advice provided by another Conservation Officer.

Change of Pub carpark to pub garden (Boundary Treatment)

The proposed scheme looks to enclose the existing 'Staff Carpark', which was originally part of the general parking for the pub, with a 1.8m gate and fence. This area is within the conservation area, and whilst the tarmac hardstanding could be considered as causing some negative impact on the appearance on the rural setting, the open nature of the car park allows views to the property. The historic OS maps show that this was an open access which allow access to the small courtyard formed of the outbuildings and the pub.

The inclosing of this space with a 1.8m boarded gates and brick wall is considered to cause harm to the character of the conservation area by forming a solid barrier of an urban nature to the site which is at odds to the more open nature of the neighbouring boundary treatments. A low-level brick wall or fencing would be considered to be a more suitable option to infill the existing opening.

The principle of the change of use from car park to garden is supported in principle. However, the boundary treatment should respond and respect the character of the conservation area. The height of the boundary treatment should allow views in and out. As discussed later, the extent of vehicle access points throughout the proposed scheme raises concerns over the impact on the significance of the historic assets. Whilst this was a historical entrance, and could be recognised as part of the design, the retention of a vehicle gated access is questioned.

New Fences

Surrounding the pub and between the tent and No.53 there are proposed alterations to the boundary treatments, realigning them to create additional private space to No.53. The use of 1.8m close boarded fences has been established on the site, though it does create a very strong visual separation of what was once an open area. The material type is typically found on modern housing estates and urban areas and so increases an urban appearance to the setting and to the character of the conservation area. The proposed relocation of the boundary fences forms further separation between the use of the public house and views out to the rear (north), resulting in a visual separation of the open spaces and creating a more urban appearance.

Further knee rail fences and boundary treatments are proposed throughout the site, and these should be removed or rationalised as the addition of built form and fences increase the urban appearance. Whilst these are low level, due to the openness of the site, and the glimpsed views, any additional forms will have a visual impact and create a visual impact of separation. Whilst some are required to ensure safety, the proposed extent does appear excessive.

Steps to the Tent

The loss of the block retaining wall and the creation of a planted bank is considered to be a positive. The creation of the steps (which has not been detailed) is considered to allow connection from the tent to the wider landscape, and therefore no harm is caused.

New Trees

The proposed scheme looks to plant additional trees, many of which line a hedge, and have been formally placed within the landscape. This creates a very ordered appearance and removes the softness of more ad-hoc, or self-seeded trees more commonly found in open landscape. The placement of the trees could be more irregularly placed which would soften the appearance. Planting trees in clumps or groups helps supports the trees whilst still offering the proposed screening effect. The planting of trees could be seen as removing the openness of the site; however, the historic maps indicate that there were orchards and trees in some of this area, and therefore the principle is acceptable.

Vehicle Access to the rear

The proposed scheme looks to create three separate vehicle accesses to the 'Multi User Games Area'. Whilst some access for emergency vehicles or for the delivery of temporary marquees or maintenance vehicles is understandable the extent of the openings is questioned as this could encourage more vehicular activity in an open green setting which would cause harm to the character of the conservation area or the setting of the listed buildings. Whilst this could be considered 'temporary', there is a potential for more continued access or temporary structures, which would be considered as a negative impact on the setting of the designated heritage assets. The extent of the vehicle access points in the stock fencing increases the appearance of gate posts and solid forms, which again removes the openness of the site, and is considered to cause harm. Access points for vehicles should be limited to reduce visual impact of gates and barriers.

Creation of the 'Multi User Games Area'

This is a change of use, from paddock to recreational field, with the boundary formed of stock fencing (no height provided) with access and pedestrian gates. The insertion of stock fencing would offer no visual difference if this was inserted to form individual paddocks for horse, and therefore the visual impact would be minimal. The creation of the vehicle gates is discussed above.

New Carpark

The proposed new carpark to the north of the farm shop will be formed of reinforced grass and edged in knee high railing to the west. To the north and east, the parking will be bordered with a new hedge, with carefully spaced new trees. The whole of the northern boundary will be formed with stock proof fence.

As previously advised, the regular placement of trees does not provide a natural appearance, and therefore the placement of the trees should be reconsidered to create a more natural placement or grouping of trees. It is unclear why the new parking are needs to be visually separated from the Games area as creating additional boundaries increases the appearance of development. Hedges are used as field boundary treatments, but the placement and position need to be considered to recognise either agricultural practice (historic field patterns) or to retain a more open nature of the site. This will help protect the glimpsed views of the open site from Tinhead Road, and in particular the group of buildings around the former George Inn.

The creation of a vehicular access from the proposed new track to the Games Area should be removed as there are other access points to the field, and the creation of the gates here could encourage additional parking (or reversing, etc) to be undertaken on the field and this would have a negative impact on the setting of the listed buildings to the north of the site, and visually intrusive on the glimpsed views from the conservation area looking out towards the open space and countryside. No justification has been submitted to support the requirement of the extensive vehicle access onto the Games Area.

The principle of the additional car park to support the rural business is considered acceptable in principle from a heritage consideration but careful consideration of the details, boundary treatments and placement of trees needs to be undertaken to protect as far as reasonable the open nature or rural nature of the site. At present, the proposed scheme is formal and carefully placed, creating a more urban, developed setting.

Farm shop

The proposed extension to the farm shop has been designed to be low-level and formed of a traditional detail found on agricultural buildings, but with large folding doors, rather than an open cart shed. This extension will house WC facilities and additional seating area / function space.

The public floor space of this building is increasing. The lower ground floor was storage, kitchen, Brewery and office space, with the shop and café on the ground floor. The proposed scheme appears to remove much of the storage space and the brewery element, which raises concerns that there will be additional pressure to provide additional building(s) to serve as storage and brewery. However, in recent years the site has already seen substantial growth in the built form, and whilst rural trade is supported and encouraged, a balance with the impact historic environment needs to be undertaken. Any additional development from a heritage consideration is unlikely to be supported, particularly to the north of the existing built form, or to the west of the farm shop as this would be considered to be overdevelopment to the edge of the village and a negative impact on the setting of the conservation area.

Renewables

Whilst the setting is more sensitive due to the setting of the listed buildings and the boundary of the conservation area, there is no consideration for the provision of renewable energy, such as PV slates/panels on the proposed new roof structure. The provision of panels to the north of the farm shop or tent would not be supported as this would encourage development in the open space and would be deemed to have a negative impact on the setting of the designated heritage asset.

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.

The site has been subject to substantial works in recent years which has seen a large extent of development on the site. To support the development, a new formal entrance has been created that has introduced urban form to the edge of the village location. This appearance has further been established with the regular spacing of the trees, advertising and the placement of car parking to the front of the site.

The proposed scheme looks to enhance the existing urban appearance by creating a 1.8m boundary treatment to the east of the public house which is within the conservation area, and this is considered to be harmful and is not supported. The loss of the car park and the creation of a garden within this space is supported and could be a positive contribution to the character of the conservation area.

The remaining scheme lies outside of the conservation area but has the potential to cause harm to the setting of the conservation area and the setting of the listed buildings as the land is currently open space that can be glimpsed from the public realm (Tinshead Road) and the group of buildings that formed the George Inn (GII listed). The sub-division of the spaces (both by hedges and fences) results in a loss of openness of the site. There is additional harm due to the extent of the vehicular access points as this raises the concern over the extent of vehicle access which is considered to have a negative impact on the setting of the designated heritage assets. It is recommended that the boundary and sub-division is reviewed, and that the boundary treatment to the front elevation is amended.

The proposals will result in harm to the character of the conservation area through the development of a 1.8m boundary treatment to the front elevation. The sub-division and regular placement of the trees would result in the loss of the open nature of the site which can be glimpsed from the conservation area and from the setting of the listed buildings to the north. An amended layout could be formed to create a more natural layout, which whilst it would result in the loss of openness, would still retain a more rural appearance. At present, the proposals are considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF, but as they involve the setting of the designated heritage assets, they should not be seen as being of lesser consequence. Indeed, the wording of the NPPF and the 'special regard' by Sections 16 and 66 of the Act requires that any level harm caused should be taken seriously.

Whilst paragraph 215 allows that a level of harm may be offset by public benefits, which could include conservation benefits, in this case no objective justification has been provided for the works and it has not been demonstrated that the works will result in any public benefit. As a result, the proposals fail to meet with the requirements of current conservation legislation, policy or guidance and I therefore recommend refusal.

Recommended Conditions

If the scheme is amended, then the potential for harm has been mitigated, and the scheme has the potential to be supported. It would therefore be recommended that in addition to the standard conditions, the following conditions are applied to ensure long term protection of the open space/ rural nature of the proposed development.

- No External Lighting within the New Carpark area or Games Area
- No additional signage past the existing access gate along the new track, new parking area or the Games Area.
- Access gates to the Games Area should be secured shut and only open for the limited time for maintenance or Emergency Access.