

REPORT FOR NORTHERN AREA PLANNING COMMITTEE

Date of Meeting	16 September 2026
Application Numbers	PL/2026/01343 and PL/2026/01528
Site Address	The Burford Brown, 22 Church Street, Lacock, Chippenham, SN15 2LB
Proposal	Construction of replacement outbuilding to create additional guest accommodation and restaurant dining area, replacement windows (like for like), and new surfacing to forecourt.
Applicant	Addington Investments Ltd
Town/Parish Council	Lacock CP
Electoral Division	Corsham Without ED
Type of application	Full planning permission and Listed building consent
Case Officer	Peter Crozier
Reason for the Application being reported to Planning Committee	Application called-in by Councillor Wragg (lack of Parish Council objection; no intrinsic historic or architectural value; accepts some heritage harm but need to support public house).

RECOMMENDATION: That Planning Permission and Listed Building Consent be REFUSED

EXECUTIVE SUMMARY

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and S70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

The application gives rise to heritage harm and as such conflicts with Core Policies 57 and 58 of the Wiltshire Core Strategy. This harm arises from the loss of part of the listed building and the associated historic fabric, and the impact the proposed re-development would have on the streetscene of East Street.

The application is supported by a Financial Viability Appraisal (FVA) which seeks to demonstrate that the public house as a going concern is unviable, but that with the additional income generated from the proposed additional accommodation, the business would be profitable and therefore sustainable as a business.

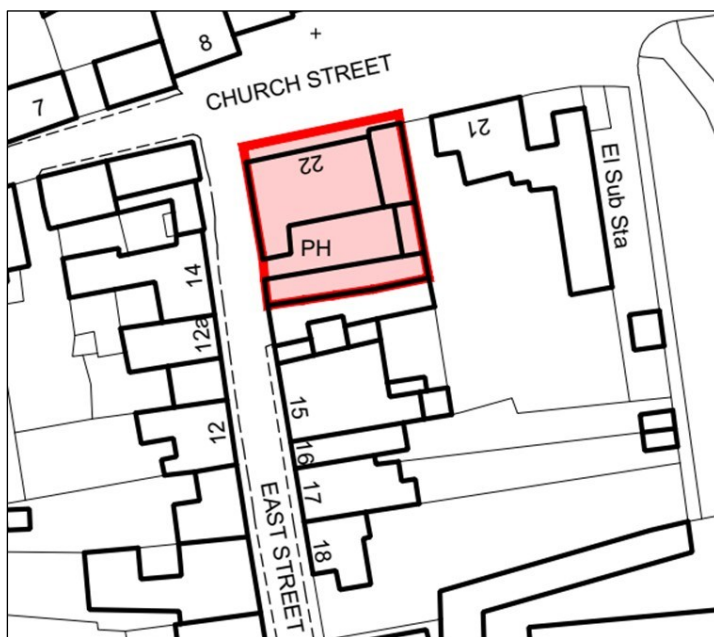
In carrying out the planning balance exercise, this report weighs the heritage harm arising against the public benefits (as per Section 16 of the NPPF), and also considers the viability issues and case presented in the submission.

Given the strength of the Conservation Officer's objection and the long-standing nature of this position, coupled with concerns raised by the National Trust, the heritage harm is considered to weigh heavily in the planning balance. This is a finely balanced decision, but with the weight of that heritage objection, set against some deficiencies in the submitted FVA, the recommendation is for refusal of planning permission and listed building consent.

PROPOSED DEVELOPMENT, SITE AND SURROUNDINGS

Site description

The Carpenters Arms is located on Church Street at the junction with East Street in Lacock, with the north elevation of the building facing the former and the west elevation facing the latter.



The main element of built form, which fronts Church Street, is a purpose-built inn dating from the 17th and 18th century, being of two storeys and built in rubble limestone with hipped stone slate roof. To the immediate east of the public house on Church Street is a tearooms/restaurant ('Hunting Lodge') and on the opposite side of Church Street is a historic terrace of very mixed visual form, with buildings in a mix of residential and commercial uses, notably the Lacock Bakery. This section of Church Street is characterised on both sides by informal on-street parking in front of the somewhat set-back buildings.

To the rear of this built form – forming part of the application site and the subject of this application – is a detached outbuilding, separated from the main public house by an enclosed courtyard area which has gated access directly onto East Street, as shown on the photographs below:



View along East Street: from the north / south

The outbuilding on site presents a one and a half storey building which is clad with modern lap boarding to the East Street elevation. The building is topped with clay tiles. It is understood that this element has been remodelled in the past from a former garage and store to provide additional restaurant space during the 1980s. The internal courtyard elevation includes some timber framing and infill panels. The building sits on a brick plinth, that to East Street includes modern engineering brick and a damp proof course can be seen. East Street is characterised by historic stone buildings of generally two-storey form and also in a somewhat mixed use; to the immediate south and abutting the timber outbuilding is a gallery ('Watlings'), but other buildings being within residential use.

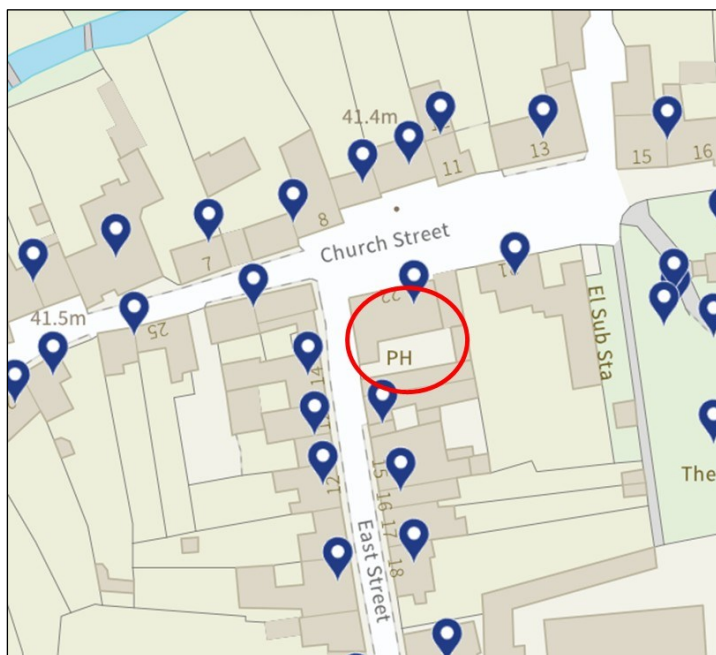
The Carpenters Arms is a listed building (Grade II), with the list description stating (List Entry No. 1363933):

"LACOCK CHURCH STREET ST 9168 (south side) 4/67 The Carpenters Arms 20.12.60 GV II

Inn, C17 and C18, rubble stone with hipped stone slate roof. Two storeys. Main range, originally plastered, has 5 early to mid C18 first floor thick glazing bar sashes in raised moulded surrounds. Drip-course over ground floor of 4 squat 16-pane sashes inserted in flush cyma-moulded frames, originally for mullion windows. Door in fourth bay in raised moulded surround with large open pedimental head on scroll brackets. At left end a lower projecting crosswing with C17 details. Long first floor 2-light window with segment heads and carved spandrels. Leaded lattice glazing over 9-pane windows. Ground floor has timber lintel over doorway in chamfered surround with 2-light cyma-moulded overlight. Side stack and south end stack. Right end, to East Street, has south end stack, one upper sash as on front and ground floor 2-light flush cyma-moulded window. Interior: ground floor wholly altered."

There are numerous other listed buildings within close proximity of the site and within the designated Lacock Conservation Area (within which the site is located) more generally, as shown on the extract below from the Historic England website¹:

¹ Of most relevance: King Johns Hunting Lodge (No. 21) Church Street (grade II*) / 15 East Street (grade II) / No's 8, 9, 10, 11, 12, 13, 23 and 24 Church Street (all grade II) / Church of St Cyriac (grade I)

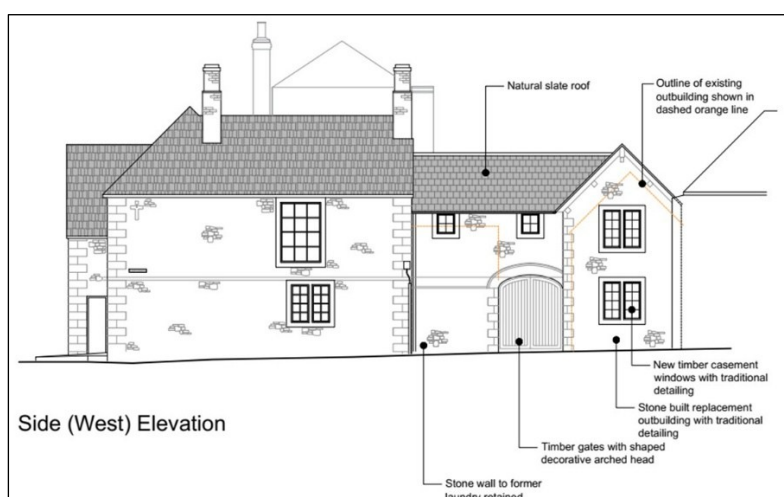


Listed buildings within proximity of the site

The site is not within the designated flood zone and is not subject to an elevated risk of groundwater flooding. The site falls within the designated Bath and Bradford-on-Avon Bat SAC (Special Area of Conservation).

Proposal

The proposal involves the demolition of both an existing timber outbuilding along with a single-storey store element of stone and gable roof, and its replacement with a stone built replacement structure which will abut the main public house building via a two-storey element, with timber gated access onto East Street at ground floor level. The street-facing (west) elevation drawing is extracted below, with the proposed new element shown to the right; also showing (as dashed orange line) the extent of the existing outbuilding:



Extract from proposed elevation drawing

The proposal drawings show the ground floor element to be used as restaurant / kitchen area (as previously approved, although with reduced cover capacity: from 36 to 28 in the rear element), along with a retained section of the external courtyard; at first floor 2no. bedrooms

are shown, with staircase access being provided at the location of the replaced single-storey store element.

Revisions and additional information

Revised details were submitted on this during the course of determination to show the windows being a like for like replacement rather than being repaired. Further details and rebuttal information was provided with regard to the viability appraisal, in response to comments made by the Council's Officers on this matter.

Description of development

During determination of the application the Applicant was requested to agree to a revised Description of Development to both reflect the above change, and also to better reflect the proposed development. Whilst the Applicant agreed to the former they did not agree to any change to the description of the proposed development.

RELEVANT PLANNING HISTORY

Proposal / Summary
PL/2025/09720 - Listed building consent (Alt/Ext) Decision - Approve with Conditions Date: 27/2/2026 – Installation of replacement and additional painted signs
PL/2025/07651 - Listed building consent (Alt/Ext) Decision - Withdrawn by Applicant Date: 2/12/2025 – Construction of replacement outbuilding to create additional guest accommodation and restaurant dining area.
PL/2025/07409 - Full planning permission Decision - Withdrawn by Applicant Date: 2/12/2025 – Construction of replacement outbuilding to create additional guest accommodation and restaurant dining area.
PL/2025/06674 - Listed building consent (Alt/Ext) Decision - Approve Date: 26/11/2025 – Alterations to internal first floor structure. Replacement of decayed timber beam, addition of steel floor beams and timber joists for strengthening. Raise floor level in part of first floor by c.150mm with associated internal alteration to door heads,
PL/2025/04077 - Listed building consent (Alt/Ext) Decision - Withdrawn by Applicant Date: 10/10/2025 – Joinery repairs to windows.
PL/2025/03414 - Listed building consent (Alt/Ext) Decision - Approve Date: 28/5/2025 – Take down and re-build chimney in central valley, apply render to chimney facing courtyard.
PL/2024/06794 - Approval of details reserved by a condition Decision - Approve Date: 3/12/2024 – Discharge of condition 5 of PL/2023/02322
PL/2024/06792 - Listed building consent (Alt/Ext) Decision - Approve with Conditions Date: 17/10/2024 – Structural works and repairs associated with previous planning approvals (PL/2023/02322 & PL/2023/02787) including the reforming of part of the existing hipped roof and new roof lights to the existing kitchen and restaurant.
PL/2024/06491 - Full planning permission Decision - Approve with Conditions Date: 17/10/2024 – Structural works and repairs associated with previous planning approvals (PL/2023/02322 & PL/2023/02787) including the reforming of part of the existing hipped roof and new roof lights to the existing kitchen and restaurant.

PL/2024/06086 - Full planning permission Decision - Refuse Date: 2/9/2024 – Replacement of existing timber windows and external doors.
PL/2024/06078 - Approval of details reserved by a condition Decision - Approve Date: 23/10/2024 – Discharge Conditions 3 on PL/2023/02787 - Refurbishment of Public House and Associated Works
PL/2024/06075 - Listed building consent (Alt/Ext) Decision - Refuse Date: 2/9/2024 – Replacement of existing timber windows and external doors.
PL/2024/03948 - Listed building consent (Alt/Ext) Decision - Refuse Date: 24/7/2024 – Improvement of external area to the front of the building with seating area, access ramp, pedestrian crossing and outlining of 5 parking bays.
PL/2024/03694 - Full planning permission Decision - Refuse Date: 24/7/2024 – Improvement of external area to the front of the building with seating area, access ramp, pedestrian crossing and outlining of 5 parking bays.
PL/2023/02787 - Listed building consent (Alt/Ext) Decision - Approve with Conditions Date: 1/2/2024 – Refurbishment of Public House and Associated Works
PL/2023/02322 - Full planning permission Decision - Approve with Conditions Date: 1/2/2024 – Refurbishment of Public House and Associated Works
N/00/01625/LBC - Listed building consent Decision - Refused Date: 12/10/2000 – ERECTION OF EXTERNAL SIGNS
N/00/00515/LBC - Listed building consent Decision - Approved Date: 17/7/2000 – INTERNAL ALTERATIONS
N/86/0932/LB - Historic apps 1974 to 1983 Decision - Approve Date: 15/9/1986 – Alterations to listed building
N/85/0980/F - Historic apps 1974 to 1983 Decision - Approve Date: 1/7/1985 – Internal alterations, refurbishment and change of use of store and garage to restaurant
N/85/0940/LB - Historic apps 1974 to 1983 Decision - Approve with Conditions Date: 1/7/1985 – Alterations to grade II listed building

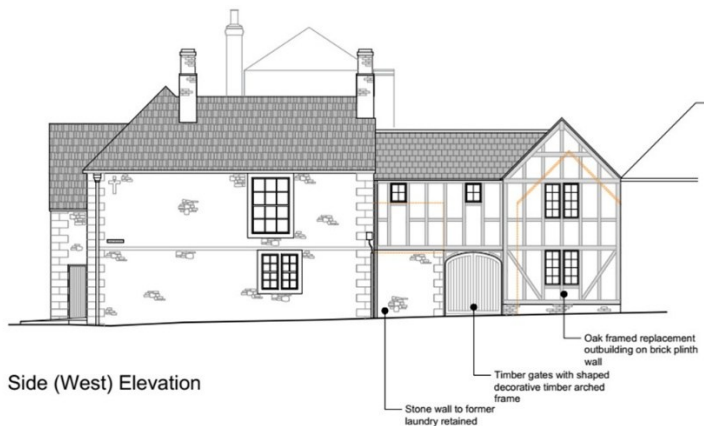
Of the above planning applications, several are directly relevant to this application proposal, with this proposal representing a revised form of previously considered proposals. In particular, planning and listed building consent applications PL/2023/02322 & PL/2023/02787, and more recently PL/2025/07651 & PL/2025/07409 are relevant.

The first of these relate to the general refurbishment of the public house, these having been approved in February 2024. However, during the course of determination of these applications, originally proposed works to the outbuilding the subject of this application were removed from the proposal on the basis that the Conservation Officer did not support that element of the scheme, although the other works for the refurbishment were approved. The originally submitted and subsequently amended (as approved) drawings from that previous application are shown below:



Original proposals / As approved following amendment

Since that time, in 2025 separate applications were made for a substantially similar proposal for the replacement of the outbuilding and store (PL/2025/07651 & PL/2025/07409). That application was withdrawn prior to determination; the proposed elevation from that scheme is shown below:



Withdrawn proposals (2025)

RELEVANT PLANNING LEGISLATION, POLICIES AND GUIDANCE

Statutory legislation

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

National Planning Policy

- National Planning Policy Framework (NPPF, updated August 2026)
- Planning Practice Guidance (PPG)
- National Design Guide

Development Plan

For the purposes of housing development, the development plan for Wiltshire comprises the Wiltshire Core Strategy ('WCS', adopted January 2015), any made neighbourhood plans, together with the Wiltshire Housing Site Allocations Plan, the Chippenham Site Allocations

Plan. These remain the principal statutory planning documents guiding development across the county.

In line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise. Though the development plan is considered as a whole, those parts deemed to be particularly relevant to this application are listed below:

Wiltshire Core Strategy (WCS)

- Core Policy 1 Settlement Strategy;
- Core Policy 2 Delivery Strategy;
- Core Policy 11 Spatial Strategy for the Corsham Community Area;
- Core Policy 38: Retail and Leisure
- Core Policy 39: Tourist Development
- Core Policy 41 Sustainable Construction and Low-Carbon Energy;
- Core Policy 50: Biodiversity and Geodiversity
- Core Policy 57 Ensuring High Quality Design and Place Shaping;
- Core Policy 58: Ensuring Conservation of the Historic Environment
- Core Policy 60 Sustainable Transport;
- Core Policy 61 Transport & Development;
- Core Policy 62 Development Impacts on the Transport Network;
- Core Policy 64 Demand Management
- Core Policy 67 Flood Risk;

Neighbourhood Plan

- There is no Neighbourhood Plan for the Lacock Parish

Supplementary Planning Documents/Guidance

- Wiltshire Design Guide (adopted April 2024)
- LTN1/20 – Cycle Infrastructure Design (July 2020)

Other relevant policies and documents

- Wiltshire Local Transport Plan 2011-2026, adopted 2015 - including the Car Parking Strategy and Cycling Strategy, adopted 2015
- Wiltshire Local Cycling and Walking Infrastructure Plan (LCWIP)
- Historic England Advice Note 2: Making changes to Heritage Assets, illustrates the application of policies set out in the NPPF in determining applications for LBC (and planning permission).
- Historic England's publication 'Traditional Windows – Their Care, Repair and Upgrading (2017)' encourages the retention of windows that contribute to the significance of listed buildings but sets also out their approach to the alteration/replacement of windows where this is acceptable in principle:
- Historic England Advice Note 18: Adapting Historic Buildings for Energy and Carbon Efficiency, provides advice in support of consistent decision making on approaches to

improve the energy efficiency and support carbon reduction of historic buildings, whilst conserving their significance.

SUMMARY OF CONSULTATION RESPONSES

Lacock Parish Council: Support.

Council Highway Engineer: No objection subject to conditions (extract below):

The proposed ground floor in comparison to the approved scheme (PL/2023/02322) will provide 10 less covers due to the layout being reconfigured with additional doorways and staircase. The proposed first floor will provide an additional 2 double bedrooms. The proposed second floor is the same as the approved scheme offering a staff welfare room. It is therefore considered that this proposal will not have a negative impact on the highway network compared to the previous scheme.

As part of the previous application it was advised that separate Operational Statement and Travel Statement should be conditioned as part of any approval, I will attach the same conditions to this application.

The Design and Access statement states that a Construction Method Statement will be submitted, although this has not been forthcoming, I will therefore attach a condition for this and a Construction Management Plan.

I raise no highway objection providing the following conditions are imposed...

Council Conservation Officer: Objection on grounds of heritage harm. Full comments of the Conservation officer are reproduced as an appendix to this report.

Council Ecologist: No objection, subject to conditions relating to ecological enhancements and lighting

Council Estates Officer: Raises concerns regarding the scope and conclusions of the submitted Financial Viability Appraisal.

National Trust: Objection to the two-storey linked extension (maintain that the Description of Development is not accurate).

Historic England: No comment received.

SUMMARY OF REPRESENTATIONS

Twenty (20) third party representations have been received, all in support of the application, although these were all received well after the consultation deadline had passed and none are from the local area. The representations support the design and note the tourism benefits.

Included within the above is a representation from National Amenities Society / SPAB. They do not raise any objection but do have concerns over the design of the proposal being too

pastiche in trying to blend in, and suggest that a more contemporary approach would be preferable. They also highlight a number of deficiencies in the submitted Heritage Impact Assessment and the scope of submitted detail.

PLANNING ASSESSMENT

In accordance with Section 70 (2) of the Town and Country Planning Act 1990, Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

"If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise."

In accordance with this statutory requirement, this application has been assessed against the relevant policies of the Development Plan, including the Wiltshire Core Strategy (2015) and, where applicable, any relevant made, or emerging, Neighbourhood Plans. Consideration has also been given to the policies of the National Planning Policy Framework (NPPF) as a material consideration in the assessment.

Principle of development, policy and planning history

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

The NPPF also contains national policies relating to the location of development. Policies S3-S5 distinguish between development within settlements and development in the countryside, support sustainable patterns of growth, and require decisions to have regard to the role and function of settlements, accessibility to services and facilities, and other site-specific considerations.

The principle of development should be assessed having regard to the Development Plan as a whole, the NPPF and all other material considerations. The weight afforded to individual policies will depend upon the nature, scale and location of the development proposed.

It is relevant that the updated NPPF seeks to retain key community facilities (Policy HC6), of which public houses form an explicit part. Policies E2 (Meeting the need for business land and premises) and E4 (Rural business development) are also relevant in their aim to support the sustainable growth of rural businesses. The latter in particular supports: "(a) *The conversion of existing buildings and well-designed new buildings,*" and "(b) *Facilities to support rural leisure and tourism and measures to retain and expand accessible local shops and services.*"

Policy S4 relates to the principle of development within settlements and states that: "*1. Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework.*" Limb 2 provides examples of

circumstances when the benefits are likely to be substantially outweighed by adverse effects, but the text clarifies that this is not an exhaustive list.

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

Design and impact on the character and appearance of the area, and impact on heritage assets

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

Regarding matters of design, the National Planning Policy Framework (NPPF), particularly Section 14: Achieving well-designed places (DP1 – 4), stresses the importance of good design in development proposals. Good design should be an integral part of the planning process and should ensure that developments complement their surroundings. The National Design Guide also builds on these aims. In seeking to promote healthy communities, (Section 16).

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

WCS CP58 indicates that the conservation of the historic environment' requires that designated and non-designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance and encourages proposals which improve the condition of heritage assets at risk.

In terms of the listed building, the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Section 16 (Listed Building Consent)/Section 66 (Planning Permission) requires that special regard be given to the desirability of preserving listed buildings, their settings or any features of special architectural or historic interest which they possess. Section 72(1) of the Act requires the Council to pay special attention to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.

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

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

or loss of, the significance of a designated heritage asset ... should have a clear and convincing justification in accordance with the policies in this chapter.”

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

Policy HE6(1) requires that “substantial weight” is given to an asset’s conservation “irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance. HE6(3) states that: *“Any harm to a designated heritage asset will be a matter of considerable importance and weight, which should be dealt with in accordance with paragraphs 4 to 6 of this policy.”* Accordingly, HE6(4) states: *“Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal. Important public benefits can include securing the long-term reuse of a vacant or underused listed building, and enabling energy efficiency and low carbon heating measures to be employed.”* HE6(5) is also directly relevant and is considered further below.

HE9 relates to Conservation Areas and requires that: *“(1) Development proposals within or affecting the significance of conservation areas should: (a) Retain and conserve buildings and other features which make a positive contribution to the character or appearance of the conservation area where possible; and (b) Consider the area’s special architectural or historic interest (as identified as part of the designation of the conservation area) in the design of development.”*

HE9(2) advises that not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. However, *“Where a development proposal would result in the loss of a building or other element which contributes to the character and appearance of a conservation area that is desirable to conserve, the assessment of impact should take into account the relative significance of the element affected and its contribution to the significance of the conservation area as whole, and the effects of this considered in accordance with policies HE5 and HE6.”*

The proposal results in the loss of a substantial element of built form which forms part of the listed building (by virtue of its curtilage listed status²) and contributes positively to the streetscene, with the existing outbuilding being of unique character in the village. In terms of character, the site is clearly part of a very sensitive streetscene and is set within the designated Conservation Area.

The applicant’s position is generally set out in the submitted Heritage Statement, which maintains that:

“Whilst the building is part of the street scene, it is not considered to form part of a key view within the conservation area owing to this section of East Street being largely residential. The confined nature of East Street also means that long-distance views

² Section 1(5) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that any object or structure within the curtilage of a listed building and in place before 1 July 1948 is to be treated as part of the listed building.

along here are limited. This is reinforced by the lack of photographs captured of this area through time.

The low-quality timber lap boarding which has been added to the building is of low quality and this unfortunately downgrades the setting of the immediately adjacent heritage assets.”

The Conservation Officer has been consistent in their position on the proposed removal of the outbuilding through the previous recent planning and listed building applications, that its removal is strongly resisted given the extent of its heritage significance. With regard to this application specifically, the Conservation Officer concludes (their response is included at Appendix 1 to this report, given their fundamental nature to the application) that:

“The proposal to demolish the existing mid-19th century outbuilding and its replacement with a new larger in scale and mass building with a different heavy rubble stone architectural appearance with additions at first floor incorporating the existing single storey stone and brick building onto the East Street are considered harmful to the listed building due to the loss of the buildings and associated structures and historic fabric, and their contribution to the historic and architectural narrative of the public house and its setting.

In addition, due to the loss of the existing building, and related alterations and the scale, massing, design and materials of the new building create a substantial change in streetscape building hierarchy and spaces that would have significant harm to the character and appearance of the street scene and Conservation Area.

The proposal offers no justification through public or conservation benefits to the long-term use of the public house to overcome the identified harm and ignores the potential for reuse and conversion of the existing buildings.”

It is thus incontrovertible that the proposal results in heritage harm and is therefore generally contrary to Section 16 of the NPPF and Core Policies 57 (iv) and 58 to the Wiltshire Core Strategy.

The proposal does not result in the total loss of a listed building, but given that it proposes the demolition of an element of a designated heritage asset, and one which is unique to the streetscene and village, there is undoubtedly harm arising to the significance of that asset. HE5(2) of the NPPF advises that: “... *substantial harm would occur where the development proposal would seriously affect a key element of the asset’s significance.*”

HE6 of the NPPF is clear that any harm to a designated heritage asset is a matter of ‘considerable importance and weight’. HE6(4) requires that in such cases, the harm should be: “... *weighed against any public benefits resulting from the proposal,*”, these can include: securing the long-term reuse of a vacant or under-used listed building, and enabling energy efficiency. It is notable that this policy supports the ‘re-use’, but not ‘loss’.

In cases where ‘substantial harm’ or ‘total loss’ arises to the significance of a designated heritage asset arises, paragraph HE6(5) is applicable and states that:

“Where a development proposal would cause substantial harm to, or the total loss of, the significance of a designated heritage asset, consent should be refused unless it can

be demonstrated that the harm is necessary to achieve substantial public benefits that outweigh the harm or loss, or if all of the following apply:

- a. The nature of the heritage asset would otherwise prevent all reasonable uses of the site;*
- b. No suitable use for the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c. Conservation by grant-funding or some form of not for profit, charitable or public ownership is not possible; and*
- d. The harm or loss is outweighed by the benefit of bringing the asset back into use.*

The Parish Council has expressed support for the application and it is clear that everybody wants to see the public house re-open and the commencement of a viable use for the building and the issues facing the hospitality sector in the wider financial climate are well documented.

However, this position is set against the objections raised by both the Conservation Officer and the National Trust. The latter (as custodian) has recorded their concerns regarding the two-storey link and the creation of a fully built-up frontage to East Street, with a resulting loss of visual hierarchy along the streetscene, impacting the historic character, with a 'considerably diminished' variety of built form.

Bringing back the building into active and viable use clearly represents a significant public benefit. However, whilst it is accepted that some harm may be necessary to achieve this public benefit, the scale of harm arising – through both the loss of the existing building and also the inappropriate form, design and appearance of the proposed replacement element, weighs heavily in the planning balance.

In this context, issues of viability are considered separately below, as these are set against the heritage harm, as representing part of the argument regarding securing its optimum viable use. The Council has sought further dialogue with the Applicant with regard to potential amendments to the scheme, but the Applicant has confirmed they remain committed to the scheme as presented / submitted. As a consequence, the Conservation Officer has confirmed that this scheme remains fundamentally unacceptable, with impacts being minimised by Conditions being inappropriate given the degree to which the current scheme is unacceptable.

Finally, the application originally proposed repair of windows (which may not explicitly require planning permission), although this was amended during the course of determination to replacement windows, and raising no particular specific objection, although would likely require submission of further detail.

The proposal results in heritage harm and is therefore contrary to Section 16 of the NPPF and Core Policies 57 (iv) and 58 (WCS). HE6(4) of the NPPF requires that in cases where harm to the significance of a designated heritage asset is caused, the harm should be: “... *weighed against any public benefits resulting from the proposal [including] securing the long-term reuse of a vacant or underused listed building.*” This weighing of the planning balance is set out below.

Impact on amenity of nearby properties

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

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

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

In terms of amenity the site is within a mixed residential and commercial area. The principle of the restaurant use and activity has been approved and issues of acceptability thus rest on any issues raised by the introduction of accommodation at first floor level.

Whilst the property on the opposite side of East Street is relatively close due to the narrow width of that road, face-to-face residential uses at first floor would not be unusual and indeed there are other examples of this arrangement a short distance along East Street.

No neighbour objections have been received and with the other examples of similar face-to-face residential uses at first floor level a short distance along East Street, it is concluded that there is no conflict arising with Core Policy 57 (WCS).

Highway safety and parking

The NPPF covers this matter in Section 15 (TR1 – 8). In particular, development should be focussed towards sustainable locations (TR3), with transport considerations being integral to the design of development (TR4). TR6(4) advises that development should only be prevented or refused on highway grounds if there would be a 'severe adverse impact on the transport network.'

Core Policies 60 to 64 of the Wiltshire Core Strategy (WCS) set out the overarching transport and accessibility framework for development across the county. These policies require that development proposals:

- Provide safe and suitable access for all users;
- Do not result in severe residual cumulative impacts on the transport network;
- Promote sustainable transport modes and reduce the need to travel by car;
- Include appropriate levels of car and cycle parking in accordance with adopted standards;
- Safeguard and enhance public rights of way and active travel routes.

The Wiltshire Local Transport Plan (2011–2026), including the Car Parking Strategy and Cycling Strategy, provides further guidance on the design and provision of transport infrastructure. The Wiltshire Local Cycling and Walking Infrastructure Plan (LCWIP) and associated design standards (2022) set out expectations for the delivery of high-quality active travel infrastructure in new developments.

Proposals should also demonstrate compliance with national design guidance, including the National Design Guide and associated documents including LTN 1/20: Cycle Infrastructure Design (DfT, 2020), which sets out principles for safe, coherent, and inclusive cycling networks.

The context of the site is one of a very restricted parking provision within the proximity of the site. Whilst there are some limited parking spaces within the village – including to the immediate frontage of the public house (although no designated spaces), in general visitors to Lacock would be likely / expected to park in the National Trust car park serving the village. Probably largely for these reasons, no third party comments have referenced parking or highway impact.

The Council's Highway Engineer has been consulted on this application and has confirmed that they have no overall objection, subject to conditions relating to a Construction Method and Management Statements and an Operational Travel Statement. This is on the basis that for the originally approved application greater clarification was sought as to how the guest accommodation is intended to be promoted and how travel to the pub for overnight stays is to be managed.

As this application will not result in any adverse impact on the highway network compared to the previously approved scheme, there are no highway impacts which cannot be suitably mitigated by way of Condition(s), and the proposal therefore accords with the aims of the NPPF, and the WCS transport policies 60-64.

Ecology and biodiversity

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

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

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

The site falls within the designated Bath and Bradford-on-Avon Bat SAC and the application is supported by a Bat Survey (prepared by Envirotech). The Ecology Officer has been consulted on the application and has confirmed that there is no objection, subject to appropriate conditions relating to compliance with the submitted documents, no external lighting and details of bat enhancement measures.

In terms of Biodiversity Net Gain (BNG), the application form confirms that this proposal falls within the 'de minimis' exemption threshold and, given the lack of any impacted habitat, this is concurred with, and as such BNG is not relevant to this application.

Although no response has been received from the Ecology Officer, given the site history and previously stated position regarding substantially similar proposals (in terms of ecological impacts), it is considered that any ecological impacts could be suitably mitigated by way of Condition, such that the application accords with the aims of the NPPF, other biodiversity related guidance, and Core Policy 50 (WCS).

Other matters

The NPPF is clear that the viability of a proposal can be taken into account, per DM5. This type of information generally relates to the provision of S106 infrastructure on larger sites, but it can be used to support for proposals for enabling development. In this instance it has been provided largely to evidence support for the loss of the existing building.

The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and viability evidence underpinning the plan is up to date, and site circumstances including any changes since the plan was brought into force, and the transparency of assumptions behind evidence submitted as part of the viability assessment.

The application has been accompanied by a Financial Viability Assessment (FVA) which has been reviewed by the Conservation Officer as well as the Council's Estates Team. Both of these have raised queries and concerns regarding the scope and conclusions of the FVA. To be clear, the Council is not seeking any planning obligations with regard to this application. Advice set out in the National Planning Practice Guidance relates in the main to circumstances where obligations are being sought with regard to a proposal.

The viability assessor has noted that whilst the appendices include the Argus appraisal for the proposed scheme, there is no correlating appraisal for the existing scheme. More detailed comments provided by the Conservation Officer note that (see Appendix 1 for their full comments) the FVA

"... has limited its scope to the current application proposals and therefore this study lacks any substantive benefits in assessing and addressing the planning balance and conservation balance.

It needs to include the option to refurbish and alter the existing outbuilding to provide two additional bedrooms and dining space which would have the benefits on the viability and would subject to details of the works, preserve the curtilage listed outbuilding and satisfy the conservation and planning benefits providing an optimum viable use that would be supported by national and local planning policy on heritage."

The position of the Applicant has remained that they wish to remove the existing outbuilding and erect a replacement building. However, as such the FVA does not consider any position relating to the potential for alterations, re-use and conversion of the existing outbuilding, which would include for its retention and offer less heritage harm.

The Applicant's team has been given the opportunity to respond to the issues raised by the Conservation Officer and Estates Team, but the position of these Officers remains one of objection, with the latter stating that: *"... the absence of supporting narrative/evidence, then*

the public will also find the document confusing. The NPPF is keen on transparency, the FVA does not achieve that ambition.”

Whilst the updated NPPF at HC6, E2 and E4 seeks to retain key community facilities (HC6) and to support the sustainable growth of rural businesses, it is noted that E4 provides caveated support, in instances which relate to the conversion of an existing building (i.e. not demolition and replacement), and in cases where these are well-designed. The concerns regarding the proposed design have been set out above.

Finally, the Applicant advised at a very late stage in the application process that the site has apparently been marketed for a period of time with no material interest. No information was submitted to support this, and in case this would not be directly relevant to this application proposal.

On the basis of the submitted FVA, there is insufficient evidence to conclude that removal of the historic outbuilding is explicitly necessary to secure a viable on-going use for the building.

PLANNING BALANCE

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

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

The proposal results in the loss of a substantial element of built form which forms part of the listed building (by virtue of its curtilage listed status) and contributes positively to the streetscene within the designated Conservation Area, with the existing outbuilding being of relatively unique character in the village. The Conservation Officer has been consistent in their position on the proposed removal of the outbuilding through the previous recent planning and listed building applications, that its removal is objectionable in principle given its heritage significance.

Furthermore, there is concern regarding the proposed scale and form of the replacement element, which appears somewhat as a ‘pastiche’ form and which is not appropriately subservient to the listed building. In this case, there is clear heritage harm arising to the significance of the designated heritage asset and these harms substantially outweigh the benefits arising, per Policy S4 (NPPF).

It is noted that the Parish Council has offered its support to the application and it is acknowledged that everybody wants to see the public house re-open and the commencement of a viable use for the building. However, this desire is set against the objections raised by

both the Conservation Officer, as well as the National Trust and, to an extent (in terms of design appropriateness) the Society for Preservation of Ancient Buildings (SPAB).

The NPPF places great weight of the protection/conservation of heritage assets, as does adopted Core Policy 58 (WCS). The proposal results in heritage harm and is therefore contrary to Section 20 of the NPPF and Core Policies 57 (iv) and 58 (WCS). The proposal results in the loss of a unique element of the streetscene, but there is clearly some distance between the Applicant and the Conservation Officer regarding the scale of harm arising: the Applicant considers this to be limited, whereas the Conservation Officer's view is that this harm relatively substantial, in the context of HE5(2) of the NPPF. HE6(4) requires that where harm arises, this should be: "... *weighed against any public benefits resulting from the proposal;*" which can include: securing the long-term reuse – but not necessarily 'loss' – of a vacant or under-used listed building, and enabling energy efficiency.

The concerns raised by the Council's Conservation Officer and the Estates Team mean that the weight that has been attributed to viability matters in the decision-making process is somewhat reduced. To be clear, the Council is not seeking any planning obligations with regard to this application, and the above Council Officers continue to have issues with the Financial Viability Appraisal, in particular it does not consider any alternative scenarios, such as the retention of the existing outbuilding and its conversion and re-use.

There are no highway (CP60, CP61 and CP62 – WCS), amenity (CP57 – WCS), ecology (CP50), or any other technical issues which give rise to any specific policy conflicts and would thus of themselves constitute any reason for refusal of the application.

Overall and on balance, it is considered that the harm arising through the loss of the existing building and the design and appearance of the proposed replacement element, substantially outweigh the public benefits of securing a viable long-term use for the building.

CONCLUSION

The application gives rise to heritage harm and as such conflicts with Core Policies 57 and 58 of the Wiltshire Core Strategy and Section 20 of the NPPF. This harm arises from the loss of part of the listed building and the associated historic fabric, and the impact the proposed re-development would have on the streetscene of East Street.

The application is supported by a Financial Viability Appraisal (FVA) which seeks to demonstrate that the public house as a going concern is unviable, but that with the additional income generated from the proposed additional accommodation, the business would be profitable and therefore sustainable as a business.

However, given the strength of the Conservation Officer's objection and the long-standing nature of this position, coupled with concerns raised by the National Trust (and SPAB) regarding the design and appearance of the proposed replacement element, the heritage harm is considered to weigh heavily in the planning balance. In this case, there is clear heritage harm arising to the significance of the listed building and designated Conservation Area, and in terms of Policy S4 of the NPPF, these harms substantially outweigh the benefits arising.

This is a finely balanced decision, but with the weight of that heritage objection, and having regard to the above and taking into account the relevant provisions of the development plan, the NPPF and other material considerations, on balance the adverse effects substantially outweigh the benefits arising and it is recommended that planning permission and listed building consent be refused.

RECOMMENDATION: That planning permission be REFUSED for the following reason:

1. The application proposes the removal of part of a significant and important element of the listed building and as such results in harm arising to the significance of the designated heritage assets of the listed building itself, as well as the Lacock Conservation Area. This harm and adverse effects substantially outweigh the public benefits arising and as such the application should be determined in accordance with the development plan, with the design and heritage harm arising conflicting with Core Policies 57(i)(iii) and (iv), and 58 (WCS), as well as Policy S4 and Section 20 (HE4, HE5, HE6 and HE9) of the NPPF.

RECOMMENDATION: That Listed Building Consent be REFUSED for the following reason:

1. The application proposes the removal of part of a significant and important element of the listed building and as such results in harm arising to the significance of the designated heritage assets of the listed building itself, as well as the Lacock Conservation Area. The proposed replacement built form is not considered to be of appropriately high quality design and appearance, exacerbating the harm arising. This harm and adverse effects substantially outweigh the public benefits arising and as such the application should be determined in accordance with the development plan, with the design and heritage harm arising conflicting with Core Policies 57(i)(iii) and (iv), and 58 (WCS), as well as Policy S4 and Section 20 (HE4, HE5, HE6 and HE9) of the NPPF.

List of plans considered

2397-050.B Location Plan
2397-002.D: Existing Site Plan
2397-010.C: Existing Plans
2397-011.E: Existing Elevations
2397-012.C: Existing Outbuilding (Plans/Section/Elevations)
2397-050.B: Proposed Site Plan
2397-051.C: Proposed Plans (received 16/07/2026)
2397-052.B: Proposed Elevations (received 16/07/2026)
(All received 26/02/2026 unless otherwise specified)

APPENDIX 1: CONSERVATION OFFICER COMMENTS

Initial comments (prior to submission of the Financial Viability Appraisal (FVA)) (14/04/2026)

Scope of comments:

The following comments relate to the built historic environment and setting of designated heritage assets.

Site Description:

The Carpenters Arms now known as The Burford Brown is a purpose-built inn dating from the 17th and 18th century. It is two storeys and built in rubble limestone with hipped stone slate roof. The main range was originally plastered, it has 5 early to mid C18 first floor, thick glazing bar sashes, in raised moulded surrounds. (One recently replaced without consent)

The ground floor has 4 squat 16 pane sashes inserted in flush cyma moulded frames originally for mullion windows under a drip course. The front door in the 4th bay is in raised moulded surround with large open pedimented head on scroll brackets. The left end is a lower projecting cross wing with 17th century details. The right end turns the corner to East Street has a south end stack and an upper sash and ground floor 2 light flush cyma moulded window.

The list description advises the interior on the ground floor is wholly altered although having been on site it retains some elements of interest and evidence of the original cross passage and room plan.

The rear outbuilding subject of this application has a structural mix of timber frame and use of the stone and brick party wall with adjoining property No. 14 East Street. It is timber horizontal cladding to the west gable onto the street and the courtyard elevation. It is open connection to the kitchen and toilet addition at the east end.

The Carpenters Arms (The Burford Brown) is located on Church Street at the junction with East Street in Lacock and makes a significant contribution to the character and appearance of this village.

Heritage Assets:

Carpenters Arms (No. 22) Church Street Lacock grade II
King Johns Hunting Lodge (No. 21) Church Street grade II *
15 East Street, Lacock grade II
No's 8, 9, 10, 11, 12, 13, 23 and 24 Church Street Lacock grade II
Church of St Cyriac Lacock grade I
Lacock Conservation Area

Relevant planning History:

2025/07651 LBC & 2025/07409 Demolition of existing outbuilding and replacement with a new outbuilding to create additional guest accommodation and restaurant dining area – The application was withdrawn by the applicant.

Relevant Policy:

From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Sections 16 (LBC) and 66

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

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

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 213 -15 of the NPPF require a balanced approach with any harm which would be caused being weighed against the potential public benefits which might be achieved.

Paragraph 210 requires local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and of new development making a positive contribution to local character and distinctiveness.

National Planning Practice Guidance provides guidance on interpreting the NPPF.

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

Wiltshire Council's Core Strategy Policy CP57 'Ensuring high quality design and place shaping': A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality.

Issues: Impact on the listed building significant architectural and historic interest and character and appearance of the Conservation Area.

Significance Assessment:

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

Significance derives not only from a heritage asset's physical presence, but also from its setting." Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place.

In this case the significance of the Carpenters Arms (The Burford Brown) building is evident in the architecture. Its form, layout, materials, outbuildings and architectural expression/detailing which have significant aesthetic and architectural interest. In addition, the setting of the neighbouring listed buildings and the use and the architectural interest of the building makes a positive contribution to the Lacock Conservation Area.

Assessment

The Carpenter's Arms (The Burford Brown) dates from the 17th century, and purpose built as a public house with the rear courtyard and associated activities including accommodation and brewing serving the local and passing trade.

This application is part of an ongoing refurbishment of the Public House by the new owner and is well presented with good quality supporting statements and details. It follows a previous planning and listed building consent application withdrawn by the applicant Ref. 2025/07651 LBC & 2025/07409 Demolition of existing outbuilding and replacement with a new outbuilding to create additional guest accommodation and restaurant dining area.

The replacement outbuilding will be taller with eaves raised from about 3.7 m to 4.5 m similar to the adjoining building 15 East Street, and ridge height of 6.4 m from existing 5.5 m to create additional attic space for two additional guest rooms to first floor and a restaurant dining area to the ground floor.

The proposals incorporate the single storey stone building at the rear of the west end cross wing. This is to have the roof removed and a first floor added that extends over the gated opening in an arch with solid timber gates.

The new building and link is proposed to be built in local stone with traditional detailing including stone quoins, stone window surrounds and mullions and a natural slate roof.

The existing outbuilding is a service building with a construction referred to as “Agricultural” in the Surveyors report. It is a mostly timber frame but utilises a masonry party wall with the neighbouring property 15 East Street. The timber frame to the west gable and the courtyard north elevations sit on a low brick plinth.

There are cross beams that sit in the masonry party wall and are connected to the timber frame. There are 1980’s small, fixed casement windows and a door to the courtyard set between the timber uprights.

The East Street end has a 20-pane fixed light from the 1980’s alterations replacing a garage door. Prior to the 1980’s restaurant conversion the building was formerly subdivided into two roughly equal spaces for store and garage.

The current floor is laid on a simple timber joist on lime mortar base with several layers of flooring above.

Evidence for a loft floor is based on the substantial cross beams and blocked in loft door/window to East Street and multi pane fixed light to the west gable. The building is open to the loft ceiling which is subdivided by trusses, the base of which are evident at the current ceiling with the cross beam’s visible features in the space.

A photograph of the roof structure in the Heritage Statement above the ceiling suggests a consistent 19th century structure with trusses, rafters and purlins and under boarded below the external roof cladding.

The timber frame is clad externally to each gable and courtyard elevation in horizontal boarding. The roof has Roman clay roof tiling.

The application has been submitted with a Structural Report dating from February 2024

Structural Engineers Report summarises the timber frame building at para. 4.6 *The former garage and store converted for use as a Restaurant is of a sub-standard form of construction with the external wall construction of timber studding and weatherboarding offering inadequate resistance to static and dynamic (wind) loads.*

It recommends that Area ‘F’ is of an “agricultural” standard and is therefore structurally inadequate for habitable personnel use. *Its outer skin of weather boarding together with the timber support posts are particularly in poor condition.... Our findings and conclusions to the*

structure of this former garage and store provides a strong argument for its demolition and replacement.

The application includes a Review of the Outbuilding Structure which has uninformed commentary by the Structural Engineer based on a lack of thorough assessment of the evidence. It suggests the previous building was substantially demolished and it was rebuilt reusing some of the materials in 1985. Its conclusions are incoherent, not based on evidence and conclude the building lacks historic integrity and therefore significance.

Whilst the simple building has gone through various repairs and uses that would be expected of a building of this form this does not mean it lacks integrity or significance. The building fabric especially the timber frame and roof are evidently 19th century. A photograph from 1860 in the Heritage Statement Section 2. Has the outbuilding is visible through the cross passage to the rear courtyard and appears much as it does today with the horizontal boarded and a multi paned window good evidence that as the Heritage Statement suggests the current building dates from the mid-19th century reinforcing the age and interest of this building.

The outbuilding to the rear is believed to have some 19th century origins although this is largely rebuilt and remodeled. This is evidenced within the Lacock Tithe Map, dated 1840 (shown top right) shows the outbuilding substantially smaller and set back away from East Street.

The 1886 OS Map shows the outbuilding in a slightly different position with it now fronting East Street and not extending quite so far into the site. The laundry building lean to was also constructed at this point.

This evidence suggests the building was first substantially altered / extended between 1840-1885. Development in the site to the rear of the site is seen again in the 1900 OS Map publication which shows extensions adjoining the main building.

The significance of the Outbuilding was discussed on site with the applicants Heritage advisor, and it was agreed that the existing building has architectural and historic significance through its fabric, construction and service use as an important part of the whole complex.

The applicant has included a good quality existing building drawing with floorplan, section and elevation that is a much more thorough and effective appraisal of the buildings structure and materials use and a record of its evolution since its origins in the early 19th century based on mapping evidence.

It highlights the tapering floor plan, mix of materials and structural evidence. The plinth (which includes some stone work to the lower courses /foundation) is brick work with a mix of lime mortar and cement pointing. The brick work shows a mix of periods of build and is in an English Bond. The front street plinth was evidently built-in 1980's as conversion from a garage and includes a DPM.

The main timber framing for walls and roof is evident in the section drawings and includes the upright framing, beams at former ceiling level (ceiling now raised to allow natural light form loft level windows) inserted into the top of the stonework of the party wall with neighbour No. 15 East Street. Above the stonework the wall is made up in brick work. The roof trusses from 4 bays are also shown in a photograph Section 3 of the Heritage Statement are 19th century in appearance.

Whilst, it does not have the architectural or historic interest of the main buildings as a modest service building it has its own significance, and it is these simpler structures are often under most threat from development proposals. As the Heritage Statement adds it contributes to the street scene and makes a positive contribution to the Conservation Area.

However, I disagree with the Heritage Statement view that the alteration made to the building over time have a negative impact on the main public house. On the contrary I consider it is an important contextual building and one that adds significance to the understanding of the former uses of the site and has an important physical presence, with a scale, massing, construction and materials that reflect its simple service use that support its positive contribution to framing the rear courtyard and gate entrance and the rear of the public house.

The proposal would be to demolish this existing building and replace with a substantially larger two storey building built in rubble limestone connected in matching stone link building at first floor on the existing stone single storey outbuilding with an arch and solid timber door enclosing the courtyard from the street.

The demolition of the outbuilding is recognised by the applicant to be harmful with the loss of the building and historic fabric.

No substantive case has been made for this demolition and the proposed connection with rear cross wing of the main public house.

The replacement building will have raised height, raised eaves in relation to the listed neighbour No. 15 East Street and a physical connection to the rear cross wing south gable end at two storeys.

The building will have an extension of the pub's restaurant accommodation on the ground floor including bi folding doors onto the courtyard and two bedrooms to the first floor. The return link will provide the new access with a half landing staircase and an ensuite to a bedroom.

The applicant has provided a Planning Statement with a justification based on *'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'*

Whilst it is acknowledged that the Carpenters Arms (Burford Brown) has a very important role in the environmental, social, and economic sustainability of Lacock I do not consider that the benefits directly related to the application effectively the provision of two additional bedrooms are sufficient public benefit to outweigh the identified considerable harm to heritage value.

This revised application has not provided any new evidence or public benefit that would justify demolition and rebuilding this outbuilding. Especially as the existing building is quite capable of being retained and converted into very similar uses. This may require raising of the existing truss roof to create the headroom for the two bedrooms to the first floor but this would be much less harmful than demolition. Careful design could incorporate a staircase possibly across the middle serving bedrooms either side accessed from the existing courtyard.

The proposals would also be due to the loss of the existing building, alteration to the single storey stone addition, loss of the metal gates and arch and the scale, massing, design and materials of the new building create a substantial change in hierarchy of buildings and spaces in the streetscape that would have a significant harm to the character and appearance of the street scene and Conservation Area.

Summary: 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 proposal to demolish the existing mid-19th country outbuilding and its replacement with a new larger in scale and mass building with a different heavy rubble stone architectural appearance with additions at first floor incorporating the existing single storey stone and brick building onto the East Street are considered harmful to the listed building due to the loss of

the buildings and associated structures and historic fabric, and their contribution to the historic and architectural narrative of the public house and its setting.

In addition, due to the loss of the existing building, and related alterations and the scale, massing, design and materials of the new building create a substantial change in streetscape building hierarchy and spaces that would have significant harm to the character and appearance of the street scene and Conservation Area.

The proposal offers no justification through public or conservation benefits to the long-term use of the public house to overcome the identified harm and ignores the potential for reuse and conversion of the existing buildings.

The proposal is therefore contrary to national and local planning policies listed above.

Follow-up comments regarding the Financial Viability Appraisal (FVA) (24/04/2026)

I have provided an additional addendum to my previous Conservation Officer comments in order to reflect on the additional Viability Appraisal submitted by the applicant received 7th April 2026.

The Consultant have undertaken a Viability Appraisal which has limited its scope to the current application proposals and therefore this study lacks any substantive benefits in assessing and addressing the planning balance and conservation balance.

It needs to include the option to refurbish and alter the existing outbuilding to provide two additional bedrooms and dining space which would have the benefits on the viability and would subject to details of the works, preserve the curtilage listed outbuilding and satisfy the conservation and planning benefits providing an optimum viable use that would be supported by national and local planning policy on heritage.

I would request that without the additional viability appraisal that looks at the alterations to the existing curtilage outbuilding that I maintain my in-principle objection to the current redevelopment of the outbuilding proposal.

My summary:

The proposal to demolish the existing mid-19th century outbuilding and its replacement with a new larger in scale and mass building with a different heavy rubble stone architectural appearance with additions at first floor incorporating the existing single storey stone and brick building onto the East Street are considered harmful to the listed building due to the loss of the buildings and associated structures and historic fabric, and their contribution to the historic and architectural narrative of the public house and its setting.

In addition, due to the loss of the existing building, and related alterations and the scale, massing, design and materials of the new building create a substantial change in streetscape building hierarchy and spaces that would have significant harm to the character and appearance of the street scene and Conservation Area.

The proposal offers no justification through public or conservation benefits to the long-term use of the public house to overcome the identified harm and ignores the potential for reuse and conversion of the existing buildings.

The proposal is therefore contrary to national and local planning policies listed above.