Wiltshire Council Planning Consultation Response

14 July 2026

Janice Gooch
Senior Conservation Officer
Wiltshire Council Conservation (Central)

Officer's Name: Helena Carney
Officer's Title: Senior Planning Officer

Application No: **PL/2026/02976 & PL/2026/02719**
Creation of new door opening, construction of external staircase and installation of new window opening in rear gable wall, change to hard landscaping and car park surfacing.
The Wheatsheaf Inn, Chilton Foliat, Hungerford, RG17 0TE

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

Recommendations:

	No comment
	Support in principle subject to amendments to the scheme (as set out below)
	Support subject to conditions (as set out below)
X	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. Sections 16 (LBC) and 66 (PP) require that **special regard** be given to the desirability of preserving or listed buildings, their settings or any features of special architectural or historic interest which they possess.

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

The NPPF outlines government policy, including its policy in respect of the historic environment. Section 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development. Paragraphs 214-16 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.

Wiltshire Council

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

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: The description of the works state 'Creation of new door opening, construction of external staircase and installation of new window opening in rear gable wall, change to hard landscaping and car park surfacing.', however these works have been completed, and this application looks to regularise these works.
As part of the review of the application, it is noted that there are other works that are not as approved and are out outside of this application.

Relevant planning history: The property has an extensive planning history and has been subject to a number of recent planning applications which have resulted in the expansion of the historic building by creating a WC block, new staircase and a large ground floor Orangery extension to support a large dining

space. Applications also included the conversion of the first floor to letting rooms, expansion of the kitchen to the outbuilding and conversion of the first floor to create a staff welfare and office facility. Within the curtilage of the building, a new annexe has been formed to allow for additional accommodation.

Issues: impact on the listed building, 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 a brief summary of significance and provides an impact of assessment for the works stated within the proposals. However, it is considered that there is no clear and convincing justification or evidence to support the assessment made. In particular there is no evidence to support the justification that where harm (less than substantial) has been recognised that these works were required to ensure that the 'ensure the successful operation of the site, subsequently helping ensure business longevity and retention of the pub use within the building.' The requirements of the NPPF are considered not to have been 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.

The Wheatsheaf Public House is a grade II listed building located in the Chilton Foliat Conservation Area. The main frontage building runs parallel to the road and is probably mid-to-late 18th century rather than the early 19th century as per the list description. In any case, the frontage building is the oldest part of the listed building and was originally a house but had become an Inn by the mid-19th century. The rear parts of the building are mid-Victorian, and the portion to the rear, at right-angles to the main building, is a former brew house.

> *House, now public house. Early C19. Daiper brickwork with laced flintwork on return. Thatched roof. 2-storey, 3 bays with 2 half glazed 6-panel doors with bracketed pent roofs. 2 late C19 canted and hipped bays. First floor has 3-light segmental headed windows. Blue vitrified brick band at first floor level. Gable stacks and stack between 1st and 2nd bays. To left, rear 2-bay wing of early C19 with 12- and 20-pane sashes.*

Internally the thatched building has been altered to the point that the ground floor is more-or-less open plan, and the original staircase(s) have been lost, the access to the first floor being beyond the original external wall within the mid-Victorian part of the building, to address the changes in floor levels.

The position with the village (a designated conservation area) contributes to the character and significance of the building. Many public houses and inns within villages were formed from mixed use developments, and this can be seen within the historic OS maps that show a collection of outbuildings which would have offered a range of facilities and services and were not solely reliant of the function of the inn (a pub with

letting rooms). It is acknowledged that the role of a pub/ inn has altered in the recent years, but the basic function of offering accommodation, food and beverage remain.

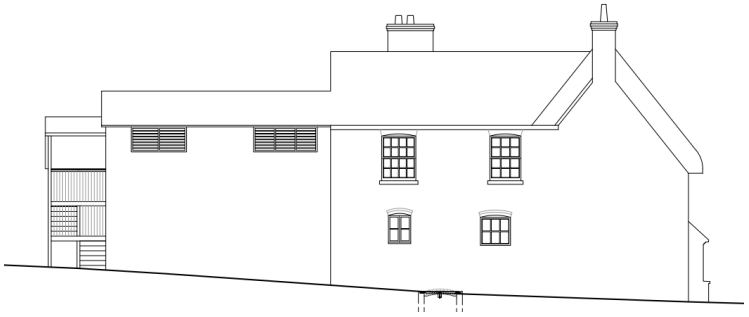
In this case the significance of the building lies largely with its historic fabric and architecture - its form, layout and vernacular design, and its long-term use as a village Inn, which have significant aesthetic and architectural interest, and which contribute to the character of the conservation area.

Assessment: The submitted application looks to undertake the 'Creation of new door opening, construction of external staircase and installation of new window opening in rear gable wall, change to hard landscaping and car park surfacing'. This is a regularising application as the works have been completed. Under the Planning (Listed Buildings and Conservation Areas) Act 1990, it is not possible to submit a 'retrospective application' as the Act is there to protect (or enhance) the significance of the listed building. Being a listed building and a commercial property, there is a restriction on permitted development rights (PDR's), and therefore some aspects, like the external landscaping are subject to planning control, as these need to consider the setting of the designated heritage assets, which include the host building, the adjoining listed buildings and the conservation area.

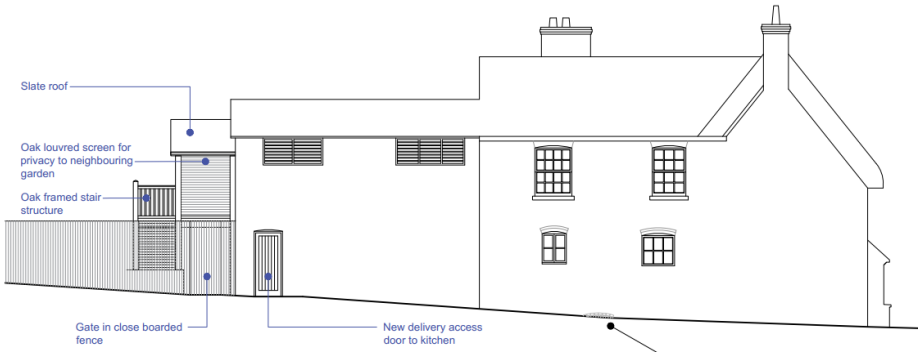
The submitted Heritage Statement has provided an Impact Assessment and this has been used as part of the assessment process. The justification of the works within the Heritage Statement Assessment are shown in italics for ease of reference.

Installation of new door opening

> *The proposed addition of the external door will result in a low level of less than substantial harm being caused to the designated heritage asset through the removal of historic fabric. Whilst there are no heritage benefits arising directly through this, it is recognised that the works form part of a wider scheme of regeneration and development at the site. This element of the scheme was identified as required owing to the completion of a detailed kitchen layout scheme. Such works will ensure the successful operation of the site, subsequently helping ensure business longevity and retention of the pub use within the building. The door has changed location from the previously consented location on the rear gable wall.*



Approved Scheme (Drawing 2398-033 Rev.K)



Proposed Scheme

Site Visit photograph

The insertion of a stable door to the rear of the kitchen extension to the former Brewery Room (outbuilding) has resulted in the loss of historic fabric and has changed the external appearance of the side elevation, which until the recently approved works to create staff facilities to the first floor/ kitchen extension, was a blank elevation. As part of the consented works, new windows were installed to the first floor, but these were screened with louvres which retain the simplicity of this former outbuilding and the entrance door to the kitchen was in the gable/ rear elevation.

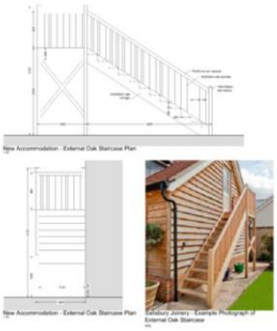
The rear of the historic inn complex would have looked inwardly, both for ease of operation but also for security. The new door changes this approach and creates a new link to the public realm where there would not historically be one. Due to the staircase structure, it would not be possible to insert the door to the approved position, so this has had a cumulative impact on the unauthorised works. It has not been demonstrated why the door needs to be inserted here, or why the kitchen layout needed to be amended from the approved layout of the building necessitating the relocation of the door.

The inserted doorway has resulted in a change of appearance and relationship with the wider street scene and has resulted in a loss of fabric. No information in the submitted application has been provided on how the door opening was formed (ie, type of lintel), joinery details or if any historic/ significant details have been lost or altered internally. Whilst it is acknowledged that the interior was consented to be altered, this does not mean that there were no elements of significance. There is no discussion with the submitted application for the change of floor plan.

The relocation of the door has resulted in harm due to the visual impact on the side elevation and the loss of fabric. Whilst it is acknowledged that some loss of fabric was accepted by creating the door in the gable end, this would retain the appearance of the side elevation and retain the openings within the curtilage.

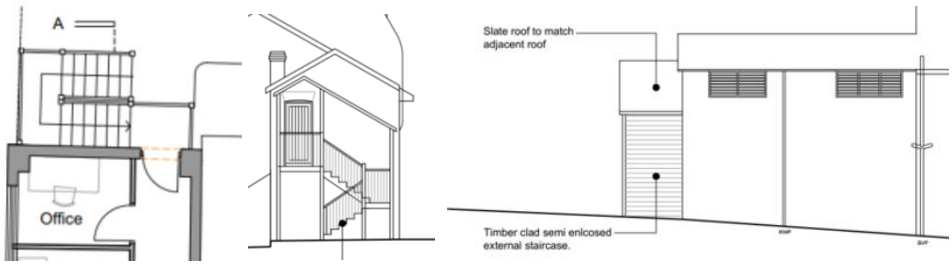
Staircase to rear gable

The addition of an external staircase was permitted under previous applications. The design of this has been amended slightly in order to provide a concealed bin store and to descend to the ground level in the garden area which are higher that the ground floor of the building. The alterations to the design are minimal and the high-quality workmanship of this element means these alterations do not change the impact of this intervention.

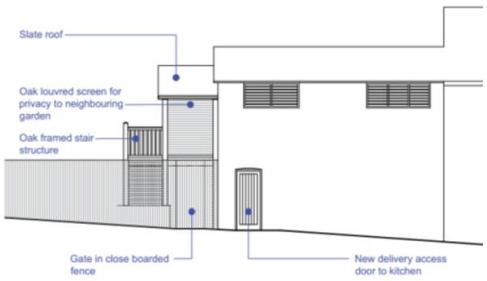


Approved Staircase (PL/202303563)

Approved conversion (PL/2023/03985)



Change of staircase as approved under PL/2026/03985



'Proposed' (as constructed)

Site visit photograph showing as completed

The first approved staircase did not create a balcony or roof and followed a traditional form that is common on outbuildings of a single flight and landing that sat flush with the building. A later application looked to alter and adjust the design, and consent was granted for a small, pitched roof to the staircase which allow access to the staff facilities to the first floor. This retained an open appearance of the treads, reducing the appearance of bulk, and did not create a space that would encourage loitering or seating which would

reduce the need for privacy screening. The width was limited to allow for safe access and therefore responded to the relationship between the outbuilding and the main pub building.

The constructed staircase creates a balcony with an extended roof form, which is not a typical detail found on outbuildings. This staircase has been fully enclosed with timber cladding creating a bulky appearance, with complexity of the structure contrasting with the former gable elevation, increasing the dominance of the structure within the garden and the public realm.

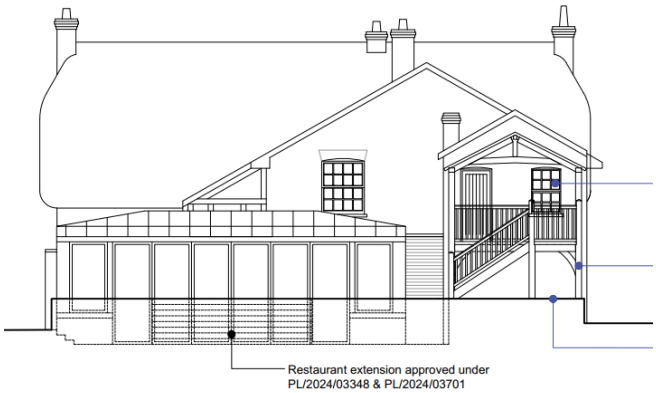
The proposed scheme (drawing) looks to create additional screening to prevent overlooking to the neighbour by infilling the side elevation. This is considered to add to the bulkiness of the addition that is already in existence. As previously noted, the original staircase would not encourage loitering and seating, and therefore there would be limited requirement to add in privacy measures.

The submitted Heritage Statement notes that the staircase now allows for an enclosed bin store to be formed underneath the balcony, but this raises safety concerns as this is a means of escape for the staff faculties.

The undertaken works creates a more clutter appearance to the side elevation, and whilst each element on its own could be considered to cause limited harm, the accumulation of the elements of the door and staircase are considered to create harm (less than substantial), and it is considered that is has not been demonstrated that there is justification for the extent of the harm. This part of the application is not supported as it has not been demonstrated that these elements are required to outweigh the harm.

Window in rear gable

The addition of a window to the gable of the attached outbuilding at first floor will cause a low level of less than substantial harm to the designated heritage asset through the removal of historic fabric. The window opening has been designed to replicate those existing on the rear of the property to ensure consistency in design. The provision of the window will provide natural light to the office.



'Proposed' (as constructed)

The window replicates the window found on the main building, therefore does not respond to the relationship of the outbuilding and the main building. The previously approved scheme ensured the balance between function and significance by retaining the external appearance of an outbuilding with the louvred windows to both elevations and placing the doors to the gabled elevation. The insertion of a window introduces a domestic appearance, which is further enhanced by replicating the window of the main building which raises the status of the outbuilding to main building.

It is recommended that if a window is required, then this should be of a scale and form to suit the appearance of the outbuilding, so a smaller scale opening in a casement design, rather than the larger sash

window. This would be a compromise to allow some natural light and ventilation into the office whilst respecting the significance of the structure.

No information in the submitted application has been provided on how the window opening was formed (ie, type of lintel), joinery details or if any historic/ significant details have been lost or altered internally. Whilst it is acknowledged that the interior was consented to be altered, this does not mean that there were no items of significance. There is no discussion with the submitted application for the change of floor plan.

The undertaken works creates a more clutter appearance to the side elevation, and whilst each element on its own could be considered to cause limited harm, the accumulation of the elements of the door and staircase are considered to create harm (less than substantial), and it is considered that is has not been demonstrated that there is justification for the extent of the harm. This part of the application is not supported as it has not been demonstrated that these elements are required to outweigh the harm.

Hard Landscaping to Forecourt

> *The hard landscaping provided to the front of the property includes yorkstone flags and red brick. The area was previously covered with asphalt which had downgraded the buildings setting. The reinstatement of a traditional surface treatment has created public benefit in the form of heritage benefit thereby enhancing the listed building and wider conservation area.*

These could be seen as a positive improvement to the external elevation of the pub as it could be considered to create a more welcoming or attractive entrance. There is concern that the external levels have been altered which will prevent the vapour permeability (breathability) of the front elevation, which has the potential to cause long term issues with the historic fabric. This concern can be easily resolved by reducing the level of the shingle and ensuring the slabs allow ventilation to the front elevation.

The use of York stone flags is not a local material but is recognised as a hard-wearing stone. Brick is a local material, and the use of this as a finish is considered acceptable. The installed planters could be considered to offer a more urban appearance due to the material choice, but as these are removable, these are considered to have limited impact to the setting of the listed building.

The installation of the hedges and planters will need to ensure viability of the property the visibility of the pub should be retained from the street scene and the safe access (vision splays) to the parking to the rear as parking to the front of the building would be seen as a negative to the significance of the designated heritage assets. It could also deter possible patrons if they felt usure or unsafe accessing the parking due to the height of the plants or restriction of the turning space due to the planters.

Google Maps Image Oct 2011

Site Visit photograph.

As installed- high ground levels

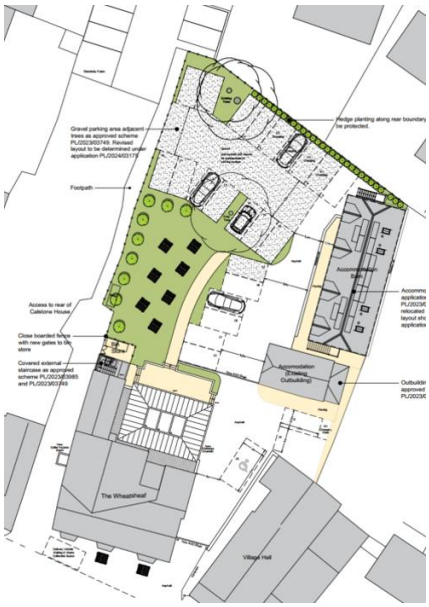
Car Park surface

The carparking surface is a mixture of asphalt and gravel which will be retained through a slight redesign of the layout. These works will have a neutral impact on the setting of the listed building.

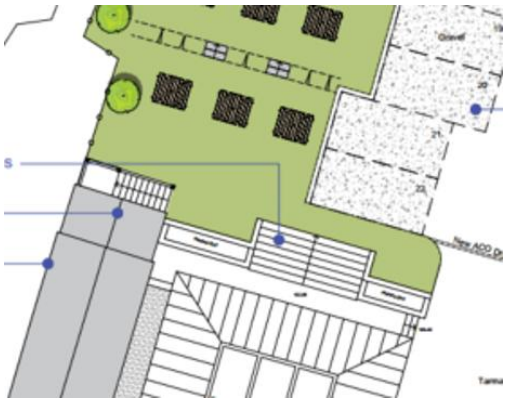
The proposed works are not considered to cause harm to the setting of the designated heritage assets. As noted above, ensuring safe access/ egress and sufficient parking to support the use of the pub is required as parking to the front will cause harm to the setting and have the potential to discourage visitors.

Steps, dwarf walls and raised planting beds

The addition of some formal features within the garden of the public house has had a neutral impact on the character and significance of the setting of the listed building. Previously, external seating was provided in a hard landscaped area on the site of the orangery which included dwarf walls and hardcore surfacing. The new landscaping scheme sees tables situated on grass with small dwarf walls and raised planting beds which gives a more informal appearance to the garden.



Approved site plan (PL/2024/03348)



Submitted scheme shows a different layout to as built

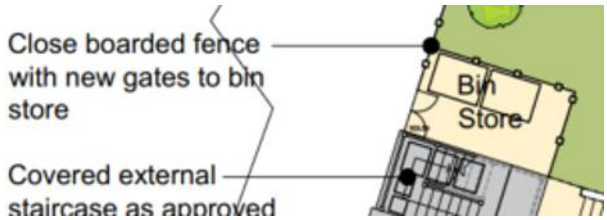
Site visit photographs

The patio outside of the Orangery has been altered to create a stepped planting either side of the steps. This is different from the proposed plan which forms part of this submission which shows less hardstanding and planting and an increase in the grass area. The proposed scheme offers a softer appearance than the more formal, urban form of formal planters (as built). The proposed drawing of the garden offers a balanced approach between creating an attractive and useable beer garden and the change of levels. The current

layout would not be supported from a heritage consideration due to its more urban form and the extent of the hard landscaping.

The introduction of the dwarf walls and hedging create a visual separation within the open courtyard, disconnecting the buildings. Whilst some separation is understandable to allow the garden to be enjoyed without views of the car park or creating a safe space for families, the use of low-level brick walls introduces a more permanent separation of the space, and if some separation was required, the use of an open fence could be considered which has been used at the end of the garden to separate the garden/ seating area and the parking. This fence is open and is not considered to cause harm to the setting of the listed building but allow some separation between garden and parking but is not shown on the proposed plans.

To the public path at the side of the property, a tall, close boarded fence has been erected further than the approved scheme which noted the closed boarded fence with new gates to the bin store. As the bin store has currently been installed under the rear staircase structure, it is unclear why the close boarded fence has been extended blocking the garden from the public realm which might prevent public from seeing the garden.



Approved scheme allowed close boarded fencing to the bin store

Site visit photograph

Conclusion

On balance it is seen that the proposed works captured within this application will have a neutral impact on the character and significance of the listed building and wider conservation area.

The works have been undertaken, and therefore the application is to regulate the unauthorised works. Whilst each element on their own could be deemed as causing limited harm, the accumulation of the elements, is considered to result in less than substantial harm. Under the NPPF, this could be offset by public benefits, which could include heritage benefits. It is deemed that within this application, no evidence has been provided to support the heritage benefits. There is some benefit with the forecourt works, but this is not considered to outweigh the balance of harm from a heritage perspective.

The application has provided limited information on how the works were undertaken, so it is not possible to make an informed decision regarding any additional harm that may have been caused, such as the loss of fabric or plan form.

<u>Consideration</u>

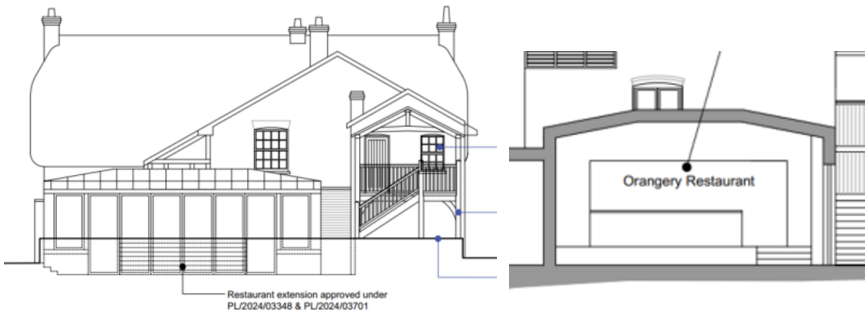
It is acknowledged that the public houses have been struggling to operate over recent years. However, there is evidence that the more traditional drinking pubs are making a positive increase in trade, resulting in a shift in the type of pubs that are becoming profitable and/ or visited. This is not uncommon with long running institutions who adapt and alter to suit the changing demands.

The works to the rear staircase which are considered the most harmful to the significance of the listed building are not part of the public area as they offer access for staff facilities only, therefore there original or amended scheme could be installed without affecting trade potential. This would then allow for the consented position of the doorway in the gable to be installed and allowing this elevation to return to have limited openings. The location of the bin store within an enclosed space which is also a means of escape for the staff raises does raise concerns from a Building Control/ Means of Escape consideration. Enclosed bin stores can help keep commercial properties tidy but installing them in enclosed or restricted spaces requires careful planning around ventilation, fire safety, and access. Failing to manage these factors can lead to trapping foul odours, attracting pests, or creating serious fire hazards.

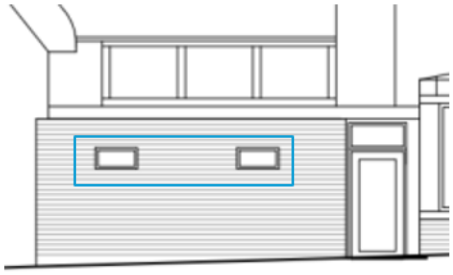
There is limited information submitted within the application on how the new door and window opening were made, the significance of the fabric lost, or how the opening were made good. There are no joinery details which would be expected within a LBC application (which could be conditioned) to ensure the protection of the significance of the listed building.

<u>Unconsented changes</u>
Reviewing the application, the site visit and the various approved drawings, there are a few elements that have not been built as consented.

Green = Different fenestration pattern to approved scheme
Purple = Insertion of lantern raising the height of the proposed roof
Orange = Insertion of Extract / MEP to support the use of the kitchen



Approved drawings showing fenestration pattern and no lantern to Orangery.



WC extension with high level windows which add interest and break appearamce of elevation

These elements should be regularised via an application or altered to suit the approved scheme.

It also appears that the signage has altered. The attachment of signs, menu boards, notices, etc., to a listed building requires LBC. The pub had a sign painted directly onto the building, and this has been covered with a new sign. The painted sign responds to the rural village nature of the inn, and forms part of the character.

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 proposals will result in harm to the building via the loss of historic fabric and character and via change to its layout and original external form. The proposals involve only part of the building and could therefore be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF, but they involve the loss of important structural historic fabric and 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.