

Design , Access , Planning and Heritage Statement relating to

Mill House, Stallard Street, Trowbridge, Wiltshire. BA14 9AE

Supporting statement for a planning application to restore and part rebuild Mill House following bomb damage





Mill House,
Stallard Street,
Trowbridge
(this section
was bombed
and a temp
repair was
made during
the war)

Project:	Mill House
Client:	Barook/8 Tec
Issue Date:	February 2022

Mill House, Stallard Street, Trowbridge
(this elevation to be retained)



EXECUTIVE SUMMARY

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- 2 CONTEXTUAL APPRAISAL
- 3 PLANNING HISTORY
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CONTEXT
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Mill House, Stallard Street, Trowbridge
(this elevation to be retained) However it should be noted
that this elevation was built either during or directly after the
war from materials left over from the bombing



This statement has been drafted to support a planning application and LBC to restore and part rebuild the property known as Mill House.

Mill House already benefits from full planning approval and LBC approval under reference 17/00200/FUL and 20/00186/VAR. These 2017 and 2020 approvals grant consent for the alterations and change of use of Mill House to four self contained C3 dwellings.

When the original approval was being prepared during 2016 and subsequently granted in 2017 little was known about Mill House apart from what was published by English Heritage or was on file at the LPA. Since that time significant information has come to light which contradicts the historical heritage beliefs of Mill House.

It has come to light that Mill House was an extension to earlier residential properties on the site. It has been discovered that during WW2 the buildings were bombed and therefore what is left on site is part of Mill House, an extension originally thought to be older, but now proved to be a post

war extension and a 1950/60's single storey extension. It was these latter two elements that were believed to be much older and more original, they are not.

Mill House in its current state was thought to be as originally built, however photographs, local history and the local museum prove this now to be incorrect.

In addition recent water damage over the last two years when the lead was stolen from the roof without anyone's knowledge means that Mill House is now in a serious state of disrepair and is in danger of going beyond repair if no action is taken.

Therefore the proposal now is to rebuild Mill House and the attached buildings as they were originally built externally prior to the bombing in WW2; albeit with a mixture of apartments and houses internally.

Instead of separate documents for Access, Design, Planning and Heritage and given that the site already has an approval, it has been decided to combine all of the elements into one document to save duplication and make easier reading.

- **There are no tree issues on site**
- **There are no highways or parking issues**
- **This is an opportunity for the buildings, which were substantially demolished during the WW2 bombing to be recreated improving the street scene and river view.**
- **Materials will be in keeping and chosen in association with the LBO and EH**
- **This is an exciting opportunity that has come about via research and the current owners love of old buildings and their desire to correct the wrongdoings of the war and post war rebuild.**



1.1 This Design, Access & Planning Statement has been drafted to accompany a planning application and LBC for permission to restore and rebuild Mill House



1.2 This Statement has been structured to accord with the advice set out in Circular 01/2006 and the CABE guidance “Design and access statements: How to write, read and use them”. It comprises the following sections:

1.3 **Contextual Appraisal:** This section comprises an appraisal of the context which informed the design including the site, its surroundings and planning policy.

1.4 **The Design Principles:** This section details the proposed design in terms of:

1. Use
2. Amount
3. Layout
4. Scale
5. Landscaping
6. Appearance

1.5 **Access Principles:** This section comprises information relating to vehicular and transport links as well as inclusive access.

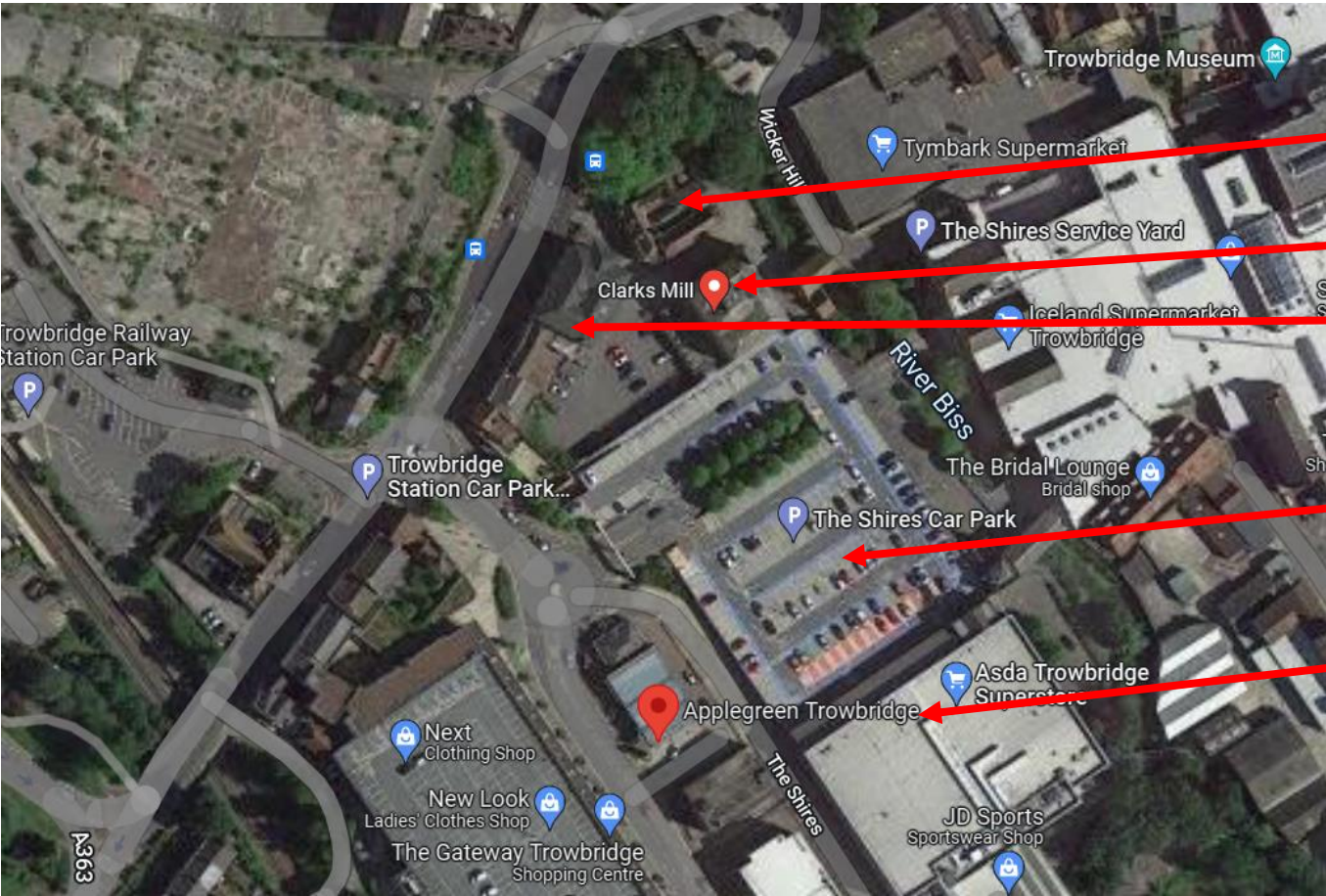
1.6 **Planning Justification:** This section examines the proposal against the statutory Development Plan and other material considerations.



- 2.1 The application site is located off Stallard Street a mixed use edge of town centre shopping and commercial area within Trowbridge. The site is bounded by Stallard Street, the river Biss and behind is a multi storey car park and shopping centre known as the Shires.
- 2.2 Historically Trowbridge was a Mill town and significant within the wool trade. Clarks Mill and Mill House were associated with this trade. Clarks Mill was used for production and Mill House was the owners accommodation for the Clarks family, understood to be two brothers.
- 2.3 Clarks Mill, formerly known as Studley Mill was made up of seven sheds and an engine house and extended into where the Shires shopping centre is now located and was believed to be one of the main employers of the town. Whether it was the main employer or not, it was certainly a significant employer and producer. Mill House was formerly known as Bridge House.
- 2.4 The property now known as Beaucroft Mansions was an extension to their business where it is understood to have goods inwards on the ground floor and offices and showrooms above. Beaucroft Mansions was converted to self contained flats after the millennium and completed circa 2007.
- 2.5 Mill House (formerly Bridge House) has been extended and rebuilt over the years. This was partly due to the business improving and the family increasing their on-site living accommodation.
- 2.6 In 1817 the house was set on fire as an arson attack due to John Clark using Gigs (this machinery raised the naps on cloth). This necessitated one of the many re-builds of Mill House.
- 2.7 In more recent history Mill House at that time used partly as a British Legion Club was bombed and substantially demolished in July 1942. an eyewitness stated that Mill House was scattered all across the bridge!
- 2.8 After the war many of the buildings surrounding the bomb site were repaired temporarily and rebuilt without any design ethos using rubble and left over materials from the bombing. This is the case with Mill House where the elevation fronting Stallard Street was not rebuilt as original and simply a new end was built and at the rear a two storey extension was built from bricks and debris from the bombing. Once this history is known, it is obvious when looking at the two storey extension that this is the case.
- 2.9 The wall fronting Stallard Street was once adorned with ornate iron railings. These were removed during the war and we are told were sent to a factory just up the road that secretly made Spitfires and munitions for the war effort. Part of this proposal is to replace the railings.
- 2.9 Mill House and Clarks Mill have a long and varied history within Trowbridge and an opportunity now exists to recreate the magic and elegance of the buildings lost in July 1942, reinstall the railings and restore the buildings and street frontage to the magnificence of what they were.



2.1



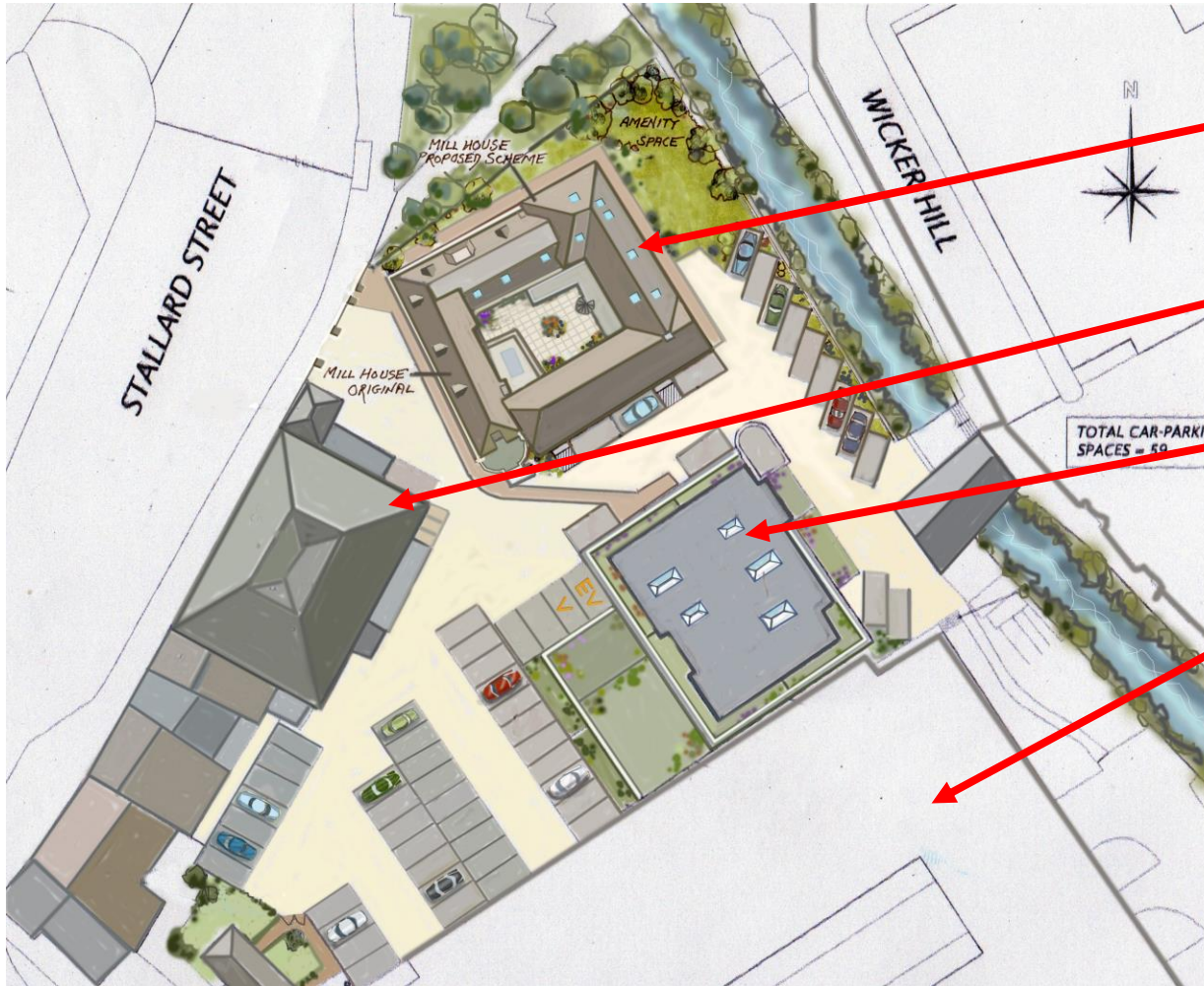
Mill House

Clarks Mill

Beaucroft Mansions

Shires Multi-Storey Car Park

Shires Shopping Centre



Mill House as proposed rebuilding what was bombed during the war

Beaucroft Mansions

Clarks Mill

Shires Multi-Storey Car Park



3.1 A search has been undertaken for any planning history that is held by the LPA.

17/00200/FUL and **20/00186/VAR**. These 2017 and 2020 approvals grant consent for the alterations and change of use of Mill House to four self contained C3 dwellings.

W/86/01360/LBC formation of new doorway in lieu of existing window.

W/01/00094/FUL change of use to education and instruction D1

W/95/00165/LBC Lengthening of ground floor windows to the front elevation

W/95/00162/FUL Lengthening of windows to front elevation

W/81/00014/HIS Improvement to existing offices

W/88/01769/FUL Change of use to Central Conservative Club

W/88/01770/LBC Internal alterations in connection with change of use from offices to club

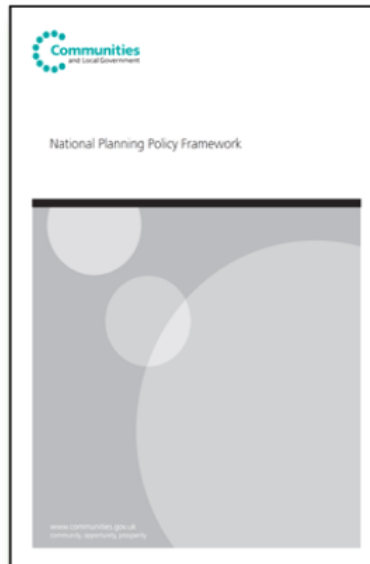
W/01/00147/LBC Internal alterations

W/01/00171/LBC Internal alterations





- 4.1 In considering applications for development the Local Planning Authority has a statutory duty under Section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

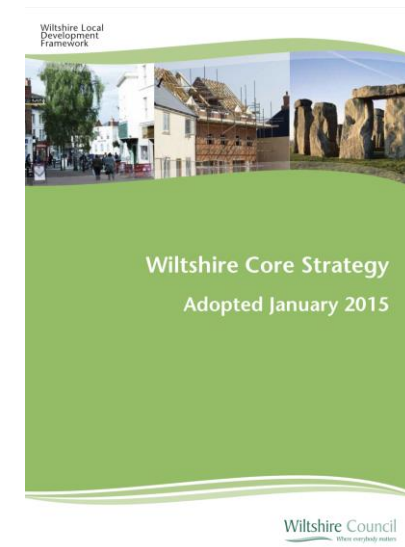


National Planning Policy Framework

- 4.2 This Framework has been published and is intended to underpin and shape planning the planning decisions which need to be made about future development. The current proposal accords entirely with these new policies except DM9 which in our opinion is historic and should not be applied.
- 4.3 It is important to the strategy that planning decisions should **use buildings to create attractive places to live, work and visit** and **optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities.**
- 4.4 The Framework also focuses on ensuring the vitality of town centre and surrounding areas. This goes on to state how **an allocation of a range of suitable sites are needed to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centre and surrounding areas.**

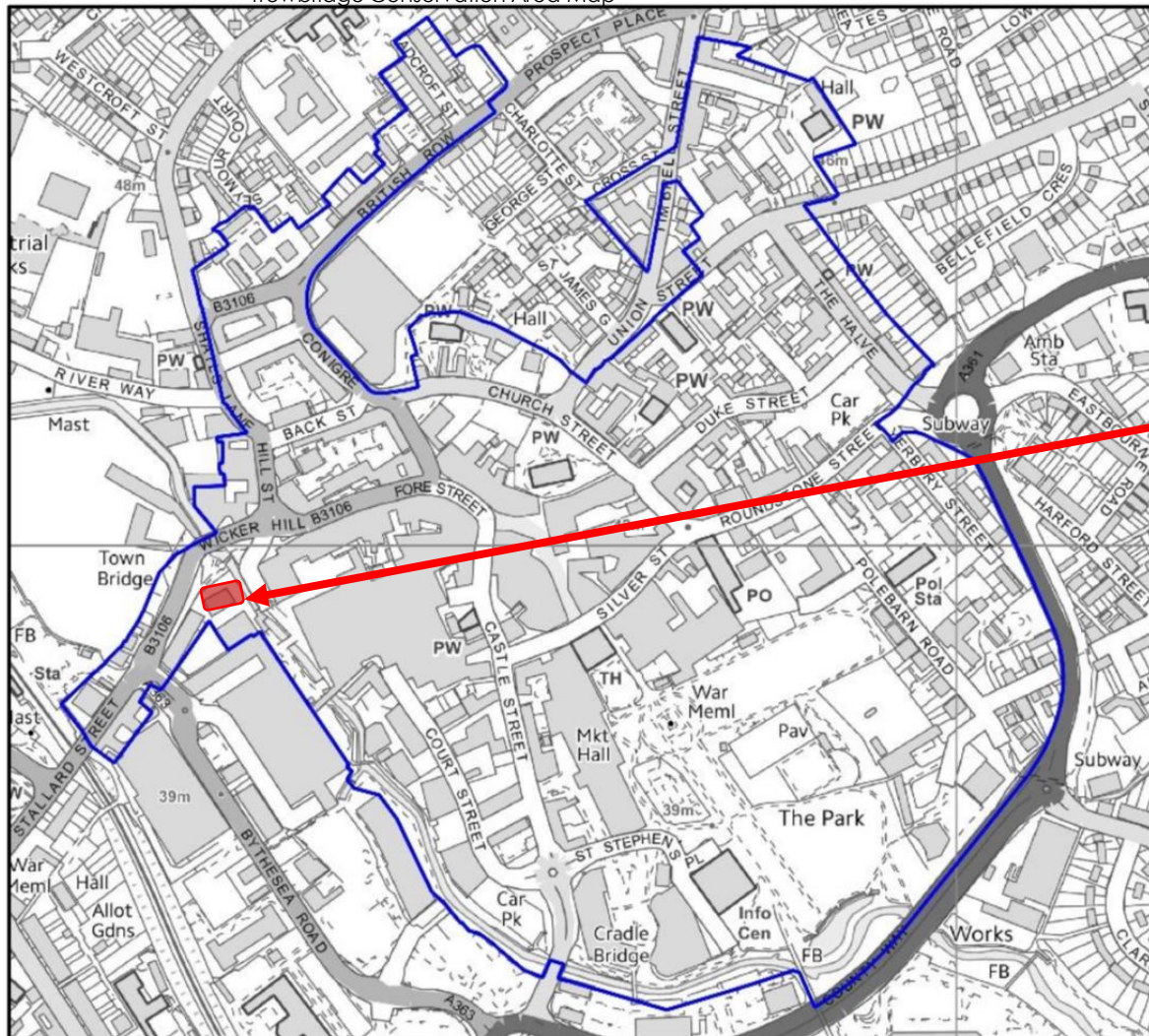
Wiltshire Core Strategy

- 4.5 The Bournemouth Core strategy is the current policy document adopted in 2015 and current until 2026
- 4.6 policy 28 covers the central Trowbridge area





Trowbridge Conservation Area Map



Trowbridge Conservation Area Map

Mill House, Stallard Street



Use

- 5.1 The existing structure was historically residential accommodation built for the mill owners and re-built or extended over a number of years with additional wings of accommodation. Through its life it has been used for a multiple of uses including clubs, offices and education. The recent planning approvals changed the use back to residential. Prior to this it had been Wiltshire College for many years.

Amount

- 5.2 Currently approved as five C3 residential dwellings (houses). The current proposal is to make it 5 flats fronting Stallard Street and five Houses.

Layout

- 5.3 The layout recreates the original footprint of the building prior to its bombing and part demolition. This has been determined accurately as the original foundations are still in place and the reconstruction can then be accurately plotted.

Architectural Style

- 5.4 Traditional design with a pitched roof's. Historic original photographs have been used to recreate the original building. The applicant will source the right size and colour brick and use the correct natural stone and other materials to make sure that the building is returned to its former glory. We would anticipate doing this with the LPA, Conservation Officer and English Heritage to ensure a quality and realistic rebuild is achieved.

Scale and Bulk

- 5.7 Generally two storeys with a pitched roof, some of which has accommodation within

Amenity/Landscaping

- 5.8 The river Biss flows next to the site and this has created the opportunity to create some informal communal garden area fronting the river. In addition the internal courtyard has been recreated giving all occupiers of Mill House some private amenity space. A separate landscape architect will be instructed to draft up a quality landscaping scheme.

Vehicular and pedestrian access

- 6.1 Under the current proposal both pedestrian and vehicular access will remain identical to the existing lawful arrangement.

Inclusive access

- 6.3 Access does not change. The houses will have a low threshold that will allow wheelchair access. The flatted units will have oversize doors and passageways leading to a wheelchair compliant lift.

Accessibility

- 6.5 The site is located within walking distance of the bus stop and is in the local commercial centre of Trowbridge. In addition the main railway station is just across the road making the site extremely accessible without the need for a car. That said car parking is provided on site for all of the proposed units.



Illustration of Mill House elevation
recreated as per original photograph





7.1 In considering applications for development the Local Planning Authority has a statutory duty under Section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine planning applications in accordance with the Development Plan unless material considerations indicate otherwise. The relevant Development Plan policies of the Local Plan (core strategy) have been considered.

In addition the building, Mill House, is nationally listed and therefore additional controls are automatically in place to safeguard the property.

Impact on character and appearance

7.2 The scheme must be assessed against the relevant Core Strategy policies and also in terms of its heritage and its listing.

7.3 The proposal to recreate/rebuild the property is exciting and came about from studious historical research.

7.4 This section should be read in conjunction with

the Heritage Statement included within this document.

7.5 In considering changes the advice document suggests the following:

1. • **No harm: the proposals would preserve the significance of the heritage asset.**
2. • **Less than substantial harm (lower end): the proposals would be anticipated to result in a restricted level of harm to the significance of the asset, meaning its contributing heritage values would be largely preserved.**
3. • **Less than substantial harm (upper end): the proposals would lead to a notable level of harm to the significance of the heritage asset. A reduced, but appreciable, degree of its significance would remain.**
4. • **Substantial harm: the proposals would very much reduce the asset's significance or lose its significance altogether.**

7.6 Given that the proposal is recreating a well designed building that was bombed during the war, the proposal should fall into category 1, that being no harm to the heritage asset. At worst it could be judged at category 2 in that less than substantial harm occurs. In either case the building does not lose its historic integrity and the building already is two significantly different to what was originally built.



Original foundations
of Mill House



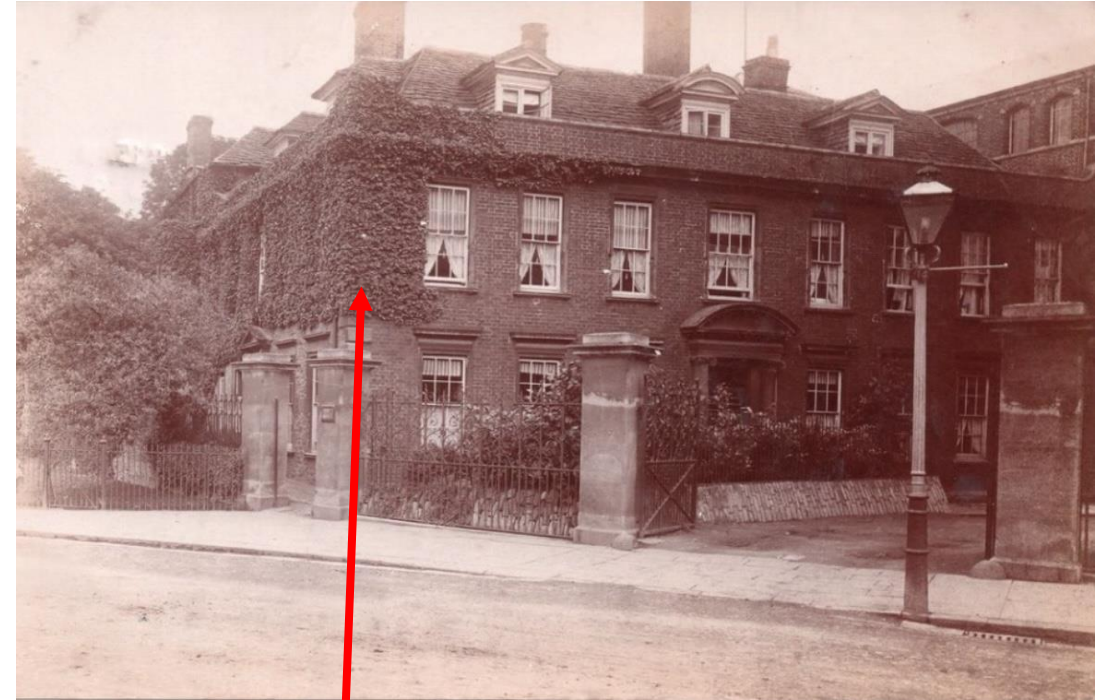
Original foundations
of Mill House



Original foundations
of Mill House



Mill House with the end (bombed)
missing in its current formation



Original photo
of Mill House showing how the
building should look.



Mill House (Stallard Street) with the end and side elevation (bombed) missing in its current formation



Original photo of Mill House and elevation fronting Stallard Street showing how the building originally looked.



Clarks Mill viewed across the river Biss

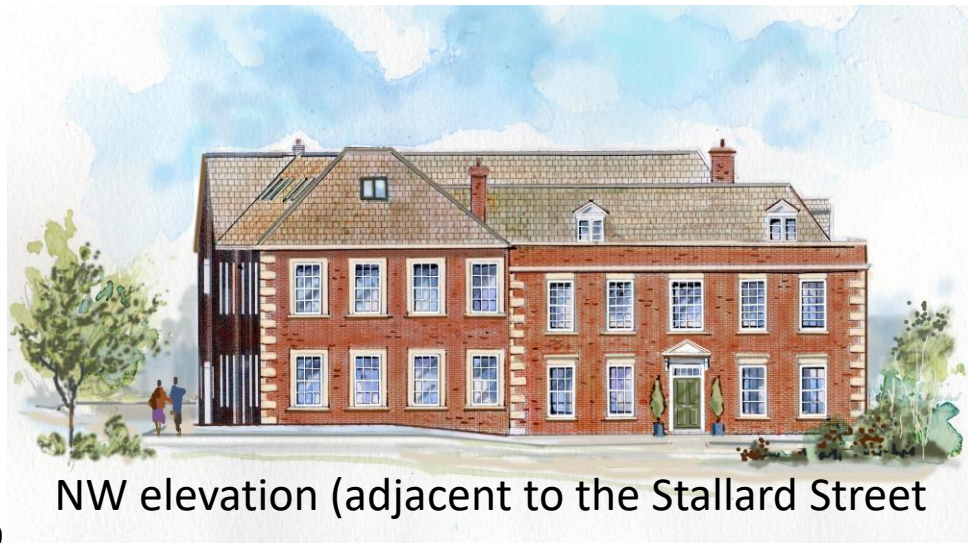
Mill House and elevation fronting the river Biss showing how the building originally was placed using the original foundations found..



NE elevation (adjacent to the river Biss)



SE elevation (adjacent to Clarks Mill
(remains as previously approved))



NW elevation (adjacent to the Stallard Street)



SW elevation
(with the corner rebuilt)



8.1 It is firmly considered that Mill House is at a critical time in its history. Recent water damage through the roof when the lead was stolen has meant that the building is in a very serious state of disrepair and urgent action is now required.

8.2 Now that the history of the cluster of buildings of Mill House is fully known, which It wasn't when the original application was approved, now is an ideal time to take positive action and deal with the building for the next 100 plus years. Recreating the existing building does exactly this. Whilst also creating additional residential units which are required within the borough.

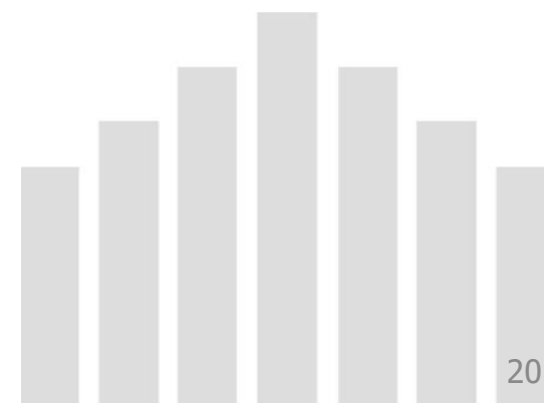
This proposal does not introduce any undue adverse impacts on the character or appearance of the conservation area, the amenities of surrounding residential occupiers or the listed building which is in a serious state of disrepair.

8.3 It is firmly considered that the rebuilding of the bombed and now unsafe and structurally unsound, Mill House is the right approach especially when balanced with the historical significance of the site.

8.4 Overall Mill House will make a positive contribution to the conservation area and nearby listed buildings. This planning gain should not be ignored and taken lightly.

8.5 Great care will need to be taken in choosing materials to ensure that the rebuilding faithfully is read as original and not a faux recreation. This can be achieved by working hand in hand with the conservation officer and English Heritage which the applicant would welcome.

8.6 This proposal really is a once in a lifetime opportunity and we would encourage all parties to grasp the opportunity and work with each other on this project.





9.1 This statement has been prepared on behalf of the owners and is submitted in support of a Conservation Area Consent and a planning application to recreate the bombed parts of Mill House.

9.2 This statement should be read in conjunction with the Planning Design and Access Statement, which describes the application site and surrounds, relevant planning history, the proposed development and planning policy context.

Planning policy context

Overview

9.3 National planning policies help to frame Development Plan documents and provide the appropriate context for review.

9.4 The Historic England Advice Note 2 'Making Changes to Heritage Assets' provides useful guidance on repair, restoration, addition and the alteration of heritage assets. National Planning Policy Framework

9.5 This statement has been prepared having regard to the aims of the NPPF, which requires the applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. Paragraph 189 states that:

'The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. This statement provides the Council with the evidence, as required by paragraph 189 of the NPPF, to assess the impact of the proposal on identified heritages assets.'

9.6 Paragraph 190 of the NPPF identifies that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset). Paragraphs 193 and 195 set out the approach to considering applications where harm is identified. Paragraph 196 identifies that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

With regard to non-designated heritage assets the NPPF identifies that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. The steer from national policy is effectively a hierarchy as follows:
Heritage benefit: the proposals would better enhance or reveal the heritage significance of the heritage asset.

- **No harm: the proposals would preserve the significance of the heritage asset.**
- **Less than substantial harm (lower end): the proposals would be anticipated to result in a restricted level of harm to the significance of the asset, meaning its contributing heritage values would be largely preserved.**
- **Less than substantial harm (upper end): the proposals would lead to a notable level of harm to the significance of the heritage asset. A reduced, but appreciable, degree of its significance would remain.**
- **Substantial harm: the proposals would very much reduce the asset's significance or lose its significance altogether.**



Wiltshire Core Strategy 2015

- 9.7 Policy 58 (Designated Heritage Assets) sets out the Council's intention to protect designated heritage assets from proposals that would adversely affect their significance. Where a proposal is likely to affect a designated heritage asset, the developer is required to submit an assessment of that asset and indicate the impact of the proposal on the asset.

Core Policy 58 Ensuring the conservation of the historic environment Development should protect, conserve and where possible enhance the historic environment. Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including: i. nationally significant archaeological remains ii. World Heritage Sites within and adjacent to Wiltshire iii. buildings and structures of special architectural or historic interest iv. the special character or appearance of conservation areas v. historic parks and gardens vi. important landscapes, including registered battlefields and townscapes. 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 potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping). Heritage assets at risk will be monitored and development proposals that improve their condition will be encouraged. The advice of statutory and local consultees will be sought in consideration of such applications

- Evidential (archaeological) value: deriving from the potential of a place to yield evidence about past human activity.
- Historical value: deriving from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative.
- Aesthetic (architectural or artistic) value: deriving from the ways in which people draw sensory and intellectual stimulation from a place.

- Communal value: deriving from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical (partly associative) and aesthetic values, but tend to have additional and specific aspects.
- 9.9 Where a proposal would lead to harm, paragraphs 195 and 196 of the NPPF require a demonstration of the proposal's public benefits. The PPG[1] clarifies that this: '...could be anything that delivers economic, social or environmental progress... They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits'.

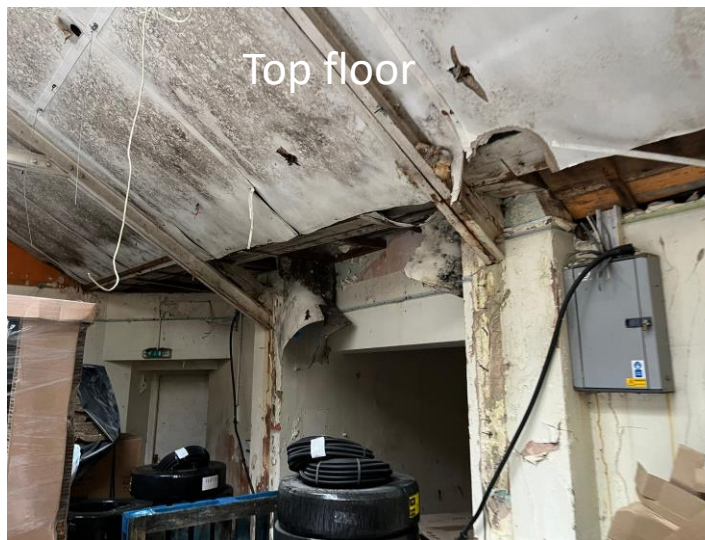
Conclusion

- 9.10 For the reasons outlined within this statement, it is strongly contended that the development would not result in any harm to the identified heritage asset.

As such, the requirements of paragraph 196 of the NPPF are not engaged and there is no need to consider the public benefits of the proposal



Top floor



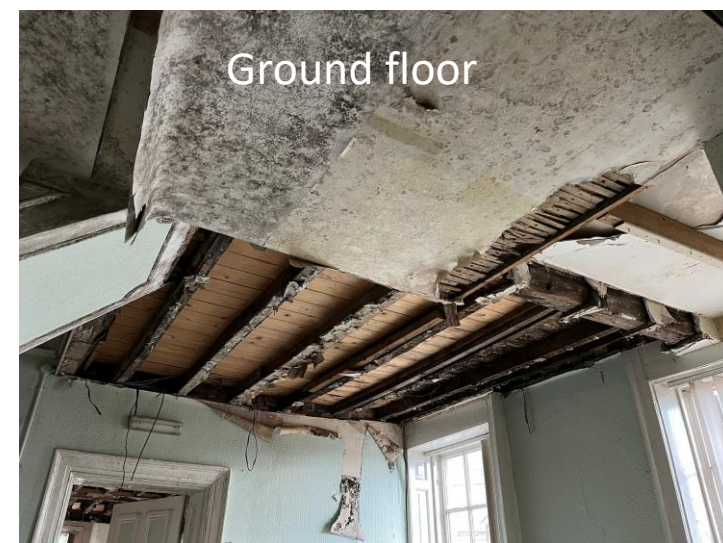
Top floor



1st floor



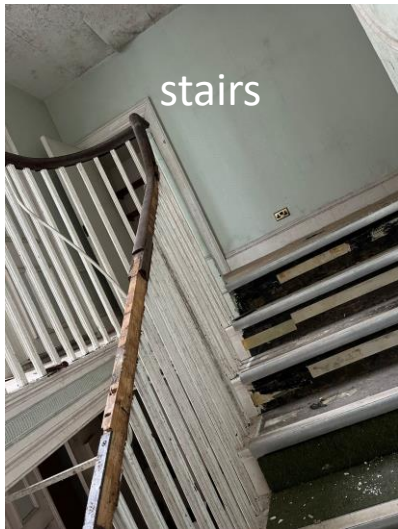
1st floor



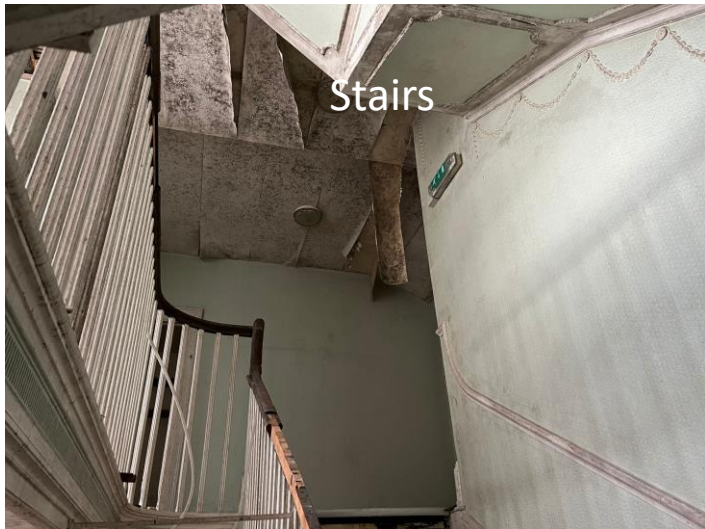
Ground floor



Lobby area



stairs



Stairs



Top floor



Top floor



Ground floor



Ground floor



Ground floor



First floor



Ground floor



Stairs and Ground floor ceiling



Ground floor



Ground floor





10 PLANS AND CORRESPONDING WATERCOLOURS





North-east Elevation



North-west Elevation

Scale: 1:500

Client: Mill House Development Ltd

Project: Mill House Development

Location: Trowbridge, Wiltshire

Date: 10/10/2023

Drawn by: [Name]

Checked by: [Name]

Approved by: [Name]

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Build

RICS

21-15436/008 C



North-east Elevation



North-west Elevation

