

BUILT HERITAGE STATEMENT

Land North of Whychurch Farm and West of Crudwell Road,
Malmesbury, Wiltshire

HER01072
Land North of Whychurch
Farm & West of Crudwell
Road, Malmesbury
v.2
11 February 2025

REPORT

Quality Management					
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1 INTRODUCTION

- 1.1 This Built Heritage Statement has been researched and prepared by RPS Consulting UK, on behalf of Gleeson Land to assess the potential impacts on the historic built environment arising from a proposed residential development of land north of Whychurch Farm and west of Crudwell Road, Malmesbury, Wiltshire (hereafter referred to as 'the Site'). The Site is centred on NGR ST 93708 88191 and is c.11.7 hectares in area [Fig.1].
- 1.2 The Statement is produced to support the submission of the planning application for the Site. The proposed development comprises residential development with associated landscaping and infrastructure. This built heritage statement meets the requirements of the NPPF and relevant Local Plan policy.
- 1.3 There are no built heritage assets, designated or non-designated, within the Site. The Site is potentially in the setting of two designated built heritage assets at Whychurch Farm close to the Site's southern boundary near to the south-eastern corner. These comprise Whychurch Farmhouse (Grade II) and an outbuilding to the northwest of Whychurch Farmhouse (Grade II). Furthermore, at a much greater distance than the above assets, the Site is potentially within the setting of a number of designated built heritage assets in the historic core of Malmesbury to the south and southwest. These include the Abbey Church of St Mary and St Aldhelm (Grade I and on the site of a scheduled monument); St Paul's Bell Tower (Grade I); and Malmesbury Conservation Area.
- 1.4 There is consequently a requirement under paragraph 207 of the NPPF for an applicant to identify heritage assets affected by the development; describe their significance, including consideration given to any contribution made by their setting; and assesses the impact of the development on the identified heritage assets' significance and the legibility of that significance. This report makes reference to the relevant legislation contained within the Planning (Listed Buildings and Conservation Areas) Act 1990 and both national and local planning policy. In addition, relevant Historic England guidance, notably *Good Practice Advice Note 3: The Setting of Heritage Assets* and *Conservation Principles*, has been consulted to inform the judgements made.
- 1.5 All maps, plans and photographs are the author's own unless otherwise noted and are provided for illustrative purposes only.
- 1.6 Relevant information, particularly referenced from the Council's *Know Your Place Wiltshire* and including the listing citations for the relevant built heritage assets, has also been consulted in preparing this Built Heritage Statement. The conclusions reached in this report are the result of historic research, a series of walkover surveys of the Site and publicly accessible locations in the surrounding area, map studies and the application of professional judgement.
- 1.7 The findings of this report are based on the known conditions at the time of writing and all findings and conclusions are time limited to no more than one year from the date of this report.
- 1.8 This report considers only built heritage assets. Archaeological heritage assets and archaeological potential for the Site are considered in a separate heritage report by RPS.

2 LEGISLATIVE AND PLANNING POLICY FRAMEWORK

- 2.1.1 The statutory requirements and national and local policy provide a framework for the consideration of development proposals that affect the historic built environment. The Planning (Listed Buildings and Conservation Areas) Act 1990 provides the overarching statutory requirements in the determination and assessment of development proposals in the historic environment. The National Planning Policy Framework (NPPF) sets out the Government's policies and requirements at a national level and the Planning Practice Guidance reflects the Secretary of State's views on the way the Government's policy should be applied. It is acknowledged that matters of legal interpretation are determined in the Courts, but the NPPF and the Practice Guidance set out clearly the Government's priorities and aspirations for planning nationally. Documents produced by Historic England provide technical advice that is designed to explain and assist in the implementation of legislation and national policy. Therefore, there is a clear hierarchy of statutory duty, policy and best practice guidance, and this has been used to inform the assessments included in this report.
- 2.1.2 The current national planning policy system identifies, through the National Planning Policy Framework (NPPF), that applicants should consider the potential impact of development upon 'heritage assets'. This term includes designated heritage assets which possess a statutory designation (for example listed buildings and conservation areas); and non-designated heritage assets, most usually identified by Local Planning Authorities (LPAs) against published criteria. In this case Wiltshire Council has not yet published a local list that covers Malmesbury.

2.2 Legislation

Planning (Listed Buildings and Conservation Areas Act) 1990

- 2.2.1 Legislation regarding buildings and areas of special architectural and historic interest is contained within the Planning (Listed Buildings and Conservation Areas) Act 1990 [hereafter the '1990 Act']. The relevant legislation in this case extends from Section 66 of the 1990 Act. Section 66 states that special regard must be given by the planning authority in the exercise of planning functions to the desirability of preserving or enhancing listed buildings and their settings.
- 2.2.2 The meaning and effect of the duty in relation to Section 66 has been considered by the courts in recent cases, including the Court of Appeal's decision in relation to Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA Civ 137. The Court agreed within the High Court's judgement that Parliament's intention in enacting section 66(1) was that decision makers should give 'considerable importance and weight' to the desirability of preserving (i.e. keeping from harm) the setting of listed buildings.
- 2.2.3 For development within a conservation area section 72 of the Act requires the decision maker to pay '*special attention [...] to the desirability of preserving or enhancing the character or appearance of that area*'. The duty to give special attention is considered commensurate with that under section 66(1) to give special regard, meaning that the decision maker must give considerable importance and weight to any such harm in the planning balance. This duty is not engaged in this case, since no part of the Site forms land within a conservation area.

Levelling Up and Regeneration Act 2023

- 2.2.4 Heritage is dealt with in Chapter 3 whereby amendments enacted to the Town and Country Planning Act 1990 and the Planning (Listed Buildings and Conservation Areas) Act 1990 are set out. The effect of the Act [Clause 102] in regard to the setting to scheduled monuments is that these now have the same statutory status to the setting of listed buildings.

- 2.2.5 Clause 102 also enacts amendments to the two Acts such that a desirability to not only 'preserve' a designated asset (World Heritage Sites; Scheduled Monuments; Registered Parks and Gardens; listed buildings and Protected Wrecks, but not conservation areas) and its setting, but now a desirability to 'preserve or enhance' such a designated asset and its setting.

2.3 National Planning Policy

National Planning Policy Framework (Department of Levelling Communities and Housing, December 2024)

- 2.3.1 The NPPF is the principal document that sets out the Government's planning policies for England and how these are expected to be applied. It defines a heritage asset as a: *'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest'*. This includes both designated and non-designated heritage assets.
- 2.3.2 Section 16: *Conserving and Enhancing the Historic Environment* relates to the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage assets are *'an irreplaceable resource and should be conserved in a manner appropriate to their significance'*.
- 2.3.3 For proposals that have the potential to affect the significance of a heritage asset, paragraph 200 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their setting. The level of detail provided should be proportionate to the significance of the heritage assets affected. This is supported by paragraph 201, which requires LPAs to take this assessment into account when considering applications.
- 2.3.4 Under *'Considering potential impacts'* the NPPF emphasises that *'great weight'* should be given to the conservation of designated heritage assets, irrespective of whether any potential impact equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets.
- 2.3.5 Paragraph 2014 states that where a development will result in substantial harm to, or total loss of, the significance of a designated heritage asset, permission should be refused, unless this harm is necessary to achieve substantial public benefits, or a number of criteria are met. Where less than substantial harm is identified paragraph 215 requires this harm to be weighed against the public benefits of the proposed development.
- 2.3.6 Paragraph 216 states that where an application will affect the significance of a non-designated heritage asset, a balanced judgement is required, having regard to the scale of harm or loss and the significance of the heritage asset.

2.4 National Guidance

Planning Practice Guidance (HCLG)

- 2.4.1 The Planning Practice Guidance (PPG) has been adopted in order to aid the application of the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle. It also states that conservation is an active process of maintenance and managing change, requiring a flexible and thoughtful approach. It highlights that neglect and decay of heritage assets is best addressed through ensuring they remain in active use that is consistent with their conservation.
- 2.4.2 The PPG defines the different heritage interests as follows:
- **Archaeological interest:** As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point;

- **Architectural and artistic interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture; and
- **Historic interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

- 2.4.3 Key elements of the guidance are related to assessing harm. It states that substantial harm is a high bar that may not arise in many cases and that while the level of harm will be at the discretion of the decision maker, generally substantial harm is a high test that will only arise where a development seriously affects a key element of an asset's special interest. It is the degree of harm, rather than the scale of development, that is to be assessed.
- 2.4.4 Importantly, it is stated that harm may arise from work to the asset, or from development within its setting. Setting is defined as 'the surroundings in which an asset is experienced and may be more extensive than the curtilage'. A thorough assessment of the impact of proposals upon setting must take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.
- 2.4.5 In terms of the identification of non-designated heritage assets, a number of processes through which they can be identified are noted, including through local and neighbourhood plan-making, and conservation area appraisals and reviews. It is noted that:
- 'Plan-making bodies should make clear and up to date information on non-designated heritage assets accessible [...] This includes information on the criteria used to select non-designated heritage assets'.*
- 2.4.6 It is also noted that '*local planning authorities may also identify non-designated heritage assets as part of the decision-making process on planning applications*'. While non-designated heritage assets could be identified against published criteria disassociated with a local list, the guidance suggests that local planning authorities maintain a local list of non-designated heritage assets.

Historic Environment Good Practice Advice in Planning

- 2.4.7 The GPAs provide supporting guidance relating to good conservation practice. The documents focus on how the good practice can be achieved through the principles included within national policy and guidance. As such, the GPAs provide information on good practice to assist LPAs, planning and other consultants, owners, applicants, and other interested parties when implementing policy found within the NPPF and PPG relating to the historic environment. These are complemented by the Historic England Advice Notes in Planning.

GPA2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

- 2.4.8 This document provides advice on numerous ways in which decision making in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to that significance. In line with the NPPF and PPG, the document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged. The advice suggests a structured, staged approach to the assembly and analysis of relevant information:
1. Understand the significance of the affected assets;
 2. Understand the impact of the proposal on that significance;

3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance balanced with the need for change; and
6. Offset negative impacts to significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

GPA3: The Setting of Heritage Assets (2nd edition; December 2017)

- 2.4.9 This advice note focuses on the management of change within the setting of heritage assets. This document replaces GPA3: *The Setting of Heritage Assets* (March 2017) and *Seeing History in the View* (English Heritage, 2011) in order to aid practitioners with the implementation of national legislation, policies and guidance relating to the setting of heritage assets found in the 1990 Act, the NPPF and PPG. The guidance is largely a continuation of the philosophy and approach of the 2015 and 2017 documents and does not present a divergence in either the definition of setting or the way in which it should be assessed.
- 2.4.10 As with the NPPF the document defines setting as *'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'*. Setting is also described as being a separate term to curtilage, character and context. The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset, or the ability to appreciate that significance. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.
- 2.4.11 While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, and thus the way in which an asset is experienced, setting also encompasses other environmental factors including noise, vibration and odour. Historical and cultural associations may also form part of the asset's setting, which can inform or enhance the significance of a heritage asset.
- 2.4.12 This document provides guidance on practical and proportionate decision making with regards to the management of change within the setting of heritage assets. It is stated that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals. It is further stated that changes within the setting of a heritage asset may have positive or neutral effects.
- 2.4.13 The document also states that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting, and that different heritage assets may have different abilities to accommodate change without harming their significance. Setting should, therefore, be assessed on a case-by-case basis.
- 2.4.14 Historic England recommends using a series of detailed steps in order to assess the potential effects of a proposed development on significance of a heritage asset. The five-step process is as follows:
1. Identify which heritage assets and their settings are affected;
 2. Assess the degree to which these settings and views make a contribution to the significance of a heritage asset(s) or allow significance to be appreciated;
 3. Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
 4. Explore ways to maximise enhancement and avoid or minimise harm; and
 5. Make and document the decision and monitor outcomes.

2.5 Local Planning Policy and Guidance

- 2.5.1 In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current development plan policy and by other material considerations. In this instance the determining authority is Wiltshire Council, and adopted local plan policies and guidance of relevant to the Site regarding built heritage are:

Wiltshire Council Core Strategy (Adopted 2015)

- 2.5.2 **Core Policy 57: Ensuring high quality design and place shaping** states that:

'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. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through:

i. 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 to local topography by ensuring that important views into, within and out of the site are to be retained and enhanced;

[...];

iii. 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;

iv. being sympathetic to and conserving historic buildings and historic landscapes;

[...];

xii. the use of high standards of building materials, finishes and landscaping, including the provision of street furniture and the integration of art and design in the public realm;

xiii. the case of major developments, ensuring they are accompanied by a detailed design statement and masterplan, which is based on an analysis of the local context and assessment of constraints and opportunities of the site and is informed by a development concept, including clearly stated design principles, which will underpin the character of the new place; and

xiv. [...].'

- 2.5.3 **Core Policy 58: Ensuring the conservation of the historic environment** states that:

'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; and

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'.

Malmesbury Conservation Area Management Plan (2010)

- 2.5.4 Malmesbury Conservation Area Management Plan (CAMP) was adopted by Wiltshire Council in February 2010 as supplementary planning guidance.
- 2.5.5 The Management Plan (CAMP) sets out Wiltshire Council's approach to managing the future of Malmesbury Conservation Area. It is informed by Malmesbury Conservation Area Appraisal (CAA) (April 2007). The appraisal contains background information on the reasons for the designation of the Area. The appraisal also contains detailed character analysis of the Area and makes observations on positive and negative features that affect its character and appearance (significance). The Management Plan uses these observations to inform development guidelines and enhancement proposals specific to the character areas studied in the Appraisal. The CAMP is a material consideration for development control purposes.
- 2.5.6 The CAMP includes general consideration of trees, greenery and open spaces, noting [p.5] that: *'The interaction between buildings and the spaces around them plays an important role in defining the character of Malmesbury. The combination of river valleys, which frame and enhance the conservation area, and public open space are afforded protection within local policies'.*
- 2.5.7 The CAMP includes general proposals for the whole Conservation Area. Proposal 'B' [p.6] states that: *'Priority is to given to the preservation and enhancement of the important 'views and panoramas listed and noted on the townscape analysis plans within the Malmesbury CAA'.* The CAA includes a list of the *'most important Views and Panoramas around the Conservation Area'* [p.22]. None of these include views or panoramas from or across the Site to the town (or of any heritage assets within the town); of the Site from the town; or sequential views or panoramas that take in the Site and the town (or any heritage assets within the town).
- 2.5.8 The last point of proposal 'G' in the CAMP [p.7] states that: *'In the wider setting [of the Conservation Area], has the impact of the proposal in views and distance been considered? Does it make a positive or a negative impact? Does it detract [sic] the eye from the focus of the view and, if so, does it provide something better to look at'?*
- 2.5.9 The CAMP includes enhancement proposals linked to character areas within the Conservation Area. Of those potentially within long views from the Site or in sequential views that take in both the Site and elements of the Area, character areas 7 ('Holloway') and 18 ('River Valley – Tetbury Branch') encourage the planting of trees on the skyline, in the case of the latter, above the Spice Merchant Restaurant on the Holloway.

Malmesbury Neighbourhood Plan

- 2.5.10 Section 61G of the Town and County Planning Act 1990, as inserted by Schedule 9, Part 1 of the Localism Act (2011), provides a local planning authority with the power to designate an area as a neighbourhood area and gives communities the opportunity to play a stronger role in planning for the neighbourhood where they live and work.
- 2.5.11 The Malmesbury Neighbourhood Plan, set out in two volumes, was made in February 2015. It notes [at A.7.1. in Vol.1] that: *'The setting to Malmesbury, and its Abbey in particular, will continue to be*

the most distinctive feature of the town's appearance. This aspect will be protected and enhanced over the coming years. Its historic buildings and the pattern of its streets, paths, public spaces and alleyways will be conserved and the public realm enhanced'.

2.5.12 *Volume I – Main Body: 6. Protecting Malmesbury's heritage and setting sets out objectives, policy and tasks that seek to preserve and enhance Malmesbury's historic town, noting that the town's setting in the countryside must be maintained.*

2.5.13 *Volume II – Design Guide sets out objectives and related tasks. Potentially relevant objectives and tasks include:*

'Development complements and enhances the character, form and qualities of Malmesbury:

Task 8.1: Development must make a positive contribution towards the distinctive character and form of the town as a whole and relate well to its site and its surroundings;

Task 8.2: Building style must be appropriate to the context;

[...]

Ensure positive relationship between town and countryside:

Task 8.4: Development proposals, particularly but not only, where sited on the edge of Malmesbury, must maintain visual connections with the countryside;

Task 8.5: The visual impact of new development on the countryside, and on views from the countryside, must be enhancing.

Achieve high quality public spaces:

[...];

Task 8.7: In order to maximise the emphasis on the pedestrian experience and quality of the public realm, consideration must be given to incorporating shared surfaces as an integral element within the design of new residential developments;

[...];

Realise high quality place making and design:

Task 8.12: The form and structure of new development must ensure that a sense of place is created, demonstrating the highest standards of urban design which respect its context, setting, local townscape and landscape character;

Task 8.13: Use continuous frontages as far as possible, by adhering to a common building line;

Task 8.14: Design of new buildings should draw from and enhance the character, form and identity of Malmesbury through high quality bespoke responses which are specific to the site;

Task 8.15: The design of boundaries between private gardens and public areas must be considered with the design of the dwelling and shown on the submitted plans, elevations and site sections;

[...];

Task 8.17: Design of new buildings should draw from the colour palette to ensure a natural harmony with the best buildings in Malmesbury;

Task 8.18: Design of new buildings must incorporate a varied skyline;

[...];

Task 8.20: The scale and massing of all new buildings must be informed by and sensitive to local topography and landscape character, townscape and the wider setting of the development within the town;

Task 8.21: The residential density of new development must be informed by and sensitive to local character, form and quality of the historic core of the Malmesbury as well as its site specific characteristics;

[...]'.

3 HISTORIC BUILT ENVIRONMENT APPRAISAL

3.1 Introduction

- 3.1.1 The following section describes the Site at present, summarises the historic development of the Site and surrounding area, and outlines how heritage assets potentially affected by the Site's development have been identified. It then assesses the significance of the identified heritage assets, including any contribution the Site currently makes to their significance.

3.2 Site Description

- 3.2.1 The Site is centred on NGR ST 93708 88191 and is c.11.7 hectares in area [Fig.1]. It is formed of land under pasture divided by hedgerows into three fields. The Site is positioned, at its nearest (the south-western point), c.775m north north-west of the north end of the High Street in the centre of Malmesbury. The Site is south of the B4104 and west of the A429 Crudwell Road (Malmesbury bypass). To the west of the Site is the extensive 1990s' housing developments centred on Webbs Way (and, to the north, the recently built out residential development centred on Snell Avenue). To the south of the Site, beyond the southern boundary, is the largely flat, open land of '*The Worthies*', which includes the ground of Malmesbury Cricket Club. Close to the Site's southern boundary, near the Site's south-eastern corner, is the collection of yards and buildings forming the farmstead of Whychurch Farm. The Site is largely flat, at a height aOD of c.90m.
- 3.2.2 There are no built heritage assets, designated or non-designated, within the Site. The Site is likely to be in the setting of two designated built heritage assets at Whychurch Farm. These comprise Whychurch Farmhouse (Grade II) and an outbuilding to the northwest of the Farmhouse (Grade II). The Site is also potentially within the wider setting of several designated built heritage assets in the historic core of Malmesbury to the south. The more prominent of these is the Abbey Church of St Mary and St Aldhelm (Grade I and on a site designated as a scheduled monument) and, further to the south, St Paul's Bell Tower (Grade I).
- 3.2.3 The historic core of the town is designated as Malmesbury Conservation Area, which includes 306 listed buildings and structures, of which six are designated at Grade I and fourteen at Grade II*. The boundary of the Conservation Area is, at its nearest point (the roundabout on Gloucester Road), c.430m west the Site's south-western corner.

3.3 Historic Development of Malmesbury

- 3.3.1 The historic development of the town is well documented in the Victoria History of Wiltshire and a comprehensive summary is included in the Malmesbury Conservation Area Appraisal [the main source used for this section].
- 3.3.2 Malmesbury occupies a steep-sided hill almost encircled by the Tetbury and Sherston branches of the River Avon and was a ninth-century burgh fortified by King Alfred. In the later Saxon period, the town became an important defensive and ecclesiastical centre. Malmesbury Abbey was a Benedictine monastery founded during the mid-seventh century by Aldhelm. This was replaced in the twelfth century by the Norman Abbey of which prominent elements of the Abbey Church survive. The Site is, at its nearest point, c.675m north north-east of the Church's standing remains. These are designated as a Grade I listed building [NHLE 1269316] and the area of the monastic precinct is designated as a scheduled monument [NHLE 1010136].
- 3.3.3 The western gable end of Whychurch Farmhouse includes remains of the medieval, pre-conquest chapel or church of St James, which was largely knocked down before the Farmhouse was built. It is possible that the farmstead was the site of an earlier settlement.

- 3.3.4 Early in the twelfth century the town was enclosed by stone walls and a castle was also built close to the Abbey to its west. The Castle was demolished in 1216. The town wall was standing in the sixteenth century but had largely disappeared by 1800.
- 3.3.5 Nearly all the land around the town belonged to the Abbey, possibly from soon after its founding. It is likely to have been agricultural and worked by the Abbey and its tenants throughout the Middle Ages [VCH 1991, 229-240]. A merchant's guild held rights and lands in the town from the thirteenth century. Their privileges were granted by royal charter in 1411. The range of trades in Malmesbury in the mid thirteenth century is illustrated by the claim of the guild to rights to sell cloth, leather goods, fish and sheepskins or hides within the town. A fulling mill was recorded in the late twelfth century and the production of woollen cloth remained Malmesbury's primary industry throughout the later Middle Ages.
- 3.3.6 During this period, the Site most likely remained part of the estate of Malmesbury Abbey, forming a portion of the agricultural lands adjacent to the small medieval settlement of Filands. The latter was situated c.140m northwest of the Site, with documentary evidence of an estate of the same name in the twelfth century under the Abbey's ownership [VCH 1991, 229-240]. By the late thirteenth century, the Abbey had fourteen tenants at Filands with the surrounding land as pasture for sheep and cattle.
- 3.3.7 The Abbey Church, in part, survived the Dissolution and replaced the ruined Church of St Paul as the parish church. In 1561 buildings in the borough were said to be in severe decay. Other former monastic buildings were used as workshops by William Stumpe, a wool merchant. Following Dissolution, the Site passed to the Crown and formed part of the manor of Whychurch with Milbourne. From the mid-sixteenth century, the Site lay within an area known as Whychurch Marsh, an area of common pasture [VCH 1991]. Whychurch Farmhouse was constructed in the seventeenth century.
- 3.3.8 Whychurch Marsh had almost certainly been enclosed prior to the 1790 Enclosure Act, at which time the settlement of Filands reduced in size and, by the nineteenth century, was represented by no more than four properties, including Filands Farm.
- 3.3.9 In 1547 the town's population was c.860, making Malmesbury Wiltshire's third largest town. The town continued to flourish as a centre for the cloth industry until around 1650. By 1801 the population had grown to 1,107 and the town had become defined as a borough. Turnpikes around the town were opened in the late eighteenth century. The woollen industry was revived c.1790 when Francis Hill built new cloth mills at Burton Hill. The railway arrived as a branch line from Brunel's Great Western Railway main line in 1875, closing in 1951 to passengers and to all traffic in 1962.
- 3.3.10 Markets and fairs continued from 1223 until the twentieth century but competition from Chippenham, Tetbury and Cirencester resulted in the closure of the cattle and general market in the 1960s.

Historic Mapping

- 3.3.11 The earliest mapping showing the Site in relation to Malmesbury and Whychurch farmstead in any useful detail is the 1773 Andrews and Drury map [Fig.2]. This includes a pictorial representation of Whychurch Farmhouse as a Classically-fronted Georgian farmhouse with an abutting ancillary building to the right. There are small arable plots shown to the immediate south and the farmstead is surrounded to the west of Holloway Hill with common land including loose belts of trees. The hamlet of Filands (as 'Filents') is shown to the north. Malmesbury is shown well set out to the south with the Abbey Church prominent.
- 3.3.12 By the eighteenth century the Site lay, as agricultural land, within the estate of Whychurch Manor. The 1803 estate map of the Manor of Whychurch cum Milbourne [Fig.3] shows the Site in more detail comprising enclosed fields to the north of Whychurch Farm. The farmstead too is shown in some detail, with the Farmhouse close to Holloway Hill with an 'L' shaped ancillary building attached to the east. The main yard, to the northwest, is framed on three sides with ancillary buildings and a

pond to the south. A secondary yard to the south includes an ancillary range on the eastern side, with a further larger, irregular-shaped pond to the west.

- 3.3.13 The Malmesbury Tithe Map of 1840 [Fig.4] confirms the Site continued to comprise pasture forming part of Whychurch Marsh, with the buildings at Whychurch farmstead shown in greater and more accurate detail. The rear ranges of the Farmhouse are complex and the abutting ancillary building to the east is shown with a longer north-south range. To the rear, north, of the Farmhouse is an orchard. The farmyards are also shown in greater detail and accuracy than on previous mapping. The main yard is shown as tighter and more squared than before. There is a detached ancillary building to the west and a small ancillary building on the boundary with the southern yard. The eastern range in the southern yard more fully wraps around the yard's north-eastern corner and extends further to the west. There are two further small ancillary buildings to the south and the southern yard is subdivided. The ponds are shown as before.
- 3.3.14 The 1886 OS 1:2,500 mapping [Fig.5] shows the Site comprising tree-lined fields with two footpaths crossing it. Two further footpaths are also shown to cross The Worthies to the south and west. There are some small buildings outside the Site along Crudwell Road. Again, there is further detail and change shown to the buildings at Whychurch Farm. The rear of the Farmhouse is less complex than before and has a central front porch with a path running up to it. The abutting ancillary building is shown as two elements. The orchard includes a small, subdivided range with frontage enclosures that probably represent a pigsty. The main yard to the west has been divided and the individual elements of the ranges are shown in nine parts. The two ponds are larger than shown before and the southern yard is only bound by an eastern range. This is formed of three elements and just about wraps round the yard's north-eastern corner. The other ancillary buildings previously represented are no longer shown.
- 3.3.15 The 1921 OS 1:2,500 mapping [Fig.6] shows that the small buildings fronting on Crudwell Road have been demolished and the houses named as 'Radcliffe' and 'Gables', with a footpath between, have been constructed beyond the Site's boundary. The arrangement of the buildings in the farmstead are much the same, the only change being the western range in the main yard has been demolished and replacement with two small, square-planned buildings, the southern one detached.
- 3.3.16 The 1979 OS 1:2,500 mapping [Fig.7] shows the field boundaries enclosing two small plots of land in the east have been removed. The former ponds had also been backfilled by this date. A water tower had been constructed at the Site's eastern margin (as a replacement to the 1870 tower next to Abbey House in the town centre) and, to the north on Crudwell Road, the house named 'Inglenook' has been built. There have been significant changes to the layout of Whychurch Farm. A large ancillary building has been added to the northern range of the main yard, with an open cart shed to the west and a small shed along the yards' division. The major change is in and around the former southern yard. A large two-piece building, presumably stock shed and storage barn, has been added to the south-western side of the farmstead. There are a further seven smaller ancillary buildings to the east of this new building.
- 3.3.17 The 2011 OS 1:2,500 mapping [Fig.8] shows that the water tower and its compound has been demolished and that, to the north beyond the Site, a new compound has been enclosed and includes a new water tower, pump house, embanked reservoir and two further small ancillary buildings. The farmstead is shown to have been further extended to the west with two large sheds.
- 3.3.18 In the wider landscape, the historic mapping shows the nineteenth and twentieth-century expansion of Malmesbury is largely to the west and also to the north off Gloucester Road. The latter includes the 1990s' housing development to the west of the Site centred on Webbs Way, with recent development to the north centred on Snell Avenue. To the south of the Site, The Worthies has always remained open land (the cricket ground being seen to be in place by the 1983 1:10,000 OS mapping [not reproduced here]) with the expansion of the town in this direction restricted by the incised and largely wooded valley of the Tetbury branch of the River Avon.

3.4 Potentially Affected Built Heritage Assets

- 3.4.1 The proposed development Site includes no designated or non-designated built heritage assets. The Site has the potential to affect built heritage assets where a portion of these assets' setting includes parts of the Site.
- 3.4.2 In order to identify built heritage assets with the potential to be affected by the proposed development of the Site, an initial search radius of 2km was used. This area includes a large proportion of the densely developed area of the historic core of Malmesbury town of the south of the Site. Most of the built heritage assets within this initial search area are entirely disassociated, including in visual terms, with the Site and their significance can readily be deemed to be unaffected by its development. It was initially identified, as a desk-based process, that the following heritage assets' significance could potentially be affected by the Site's development. These comprise the following built heritage assets:
- Abbey Church of St Mary and St Aldhelm, Grade I (NHLE 1269316);
 - St Paul's Bell Tower, Grade I (NHLE 1269428);
 - Milestone at NGR ST935889, Grade II (NHLE 1022269);
 - Nos.33 and 35, Blicks Hill and attached front garden wall, Grade II (NHLE 1269523);
 - No.37 Blicks Hill, Grade II (NHLE 1269524);
 - Whychurch Farmhouse, Grade II (NHLE 1269337); and
 - Outbuilding to west north-west of Whychurch Farmhouse, Grade II (NHLE 1269338); and
 - Malmesbury Conservation Area.
- 3.4.3 No other built heritage asset's significance will be meaningfully affected by the proposed development of the Site.
- 3.4.4 Following the building up of an understanding of the historical development of the Site and the area around – the morphology, character and appearance of that area and how these have altered or remained through time – a series of walk-over survey of the Site and area, including the town of Malmesbury, were conducted to review the initially identified heritage assets' significance and their relationship if any, including visually, to the Site.
- 3.4.5 Of those built heritage assets noted above, St Paul's Bell Tower is almost wholly screened from the north, including by the Abbey Church; the milestone on Crudwell Road is a discrete, small verge-side asset c.200m northeast of the Site; and the three listed buildings at Blicks Hill are set low within a wooded valley to the east of Malmesbury and are almost entirely screened by trees along the northern edge of the valley (part of the southern boundary to The Worthies). None of these assets are known to have a current or historic association with the Site and are largely visually screened from the Site, such that there is no meaningful understanding of their significance in views in this direction from the Site or in any sequential views taking in the Site and the assets.
- 3.4.6 Many historic structures and areas are subsumed into the dense, close-knit built form of Malmesbury's townscape. This has the effect of restricting the extent of their setting and the spatial spread of their individual significance's legibility. Consequently, most built heritage assets within Malmesbury Conservation Area, though within the initial 2km search radius from the Site, will also not have their significance and its legibility meaningfully affected by the Site's development. In relation to individual built heritage assets within the Conservation Area (which number over 300), only the Abbey Church holds any degree of a meaningful relationship (visual and residual historic association) with any part of the Site.
- 3.4.7 Subsequently, the built heritage assets considered as having the potential to have their significance and/or its legibility meaningfully affected by the Site's development have their significance assessed below. These comprise the:

- Abbey Church of St Mary and St Aldhelm, Grade I (NHLE 1269316);
- Whychurch Farmhouse, Grade II (NHLE 1269337);
- Outbuilding to west north-west of Whychurch Farmhouse, Grade II (NHLE 1269338); and
- Malmesbury Conservation Area.

3.4.8 The following section of this report provides a proportionate assessment of the significance of each of these identified heritage assets, with consideration given to any contribution made by their settings, as required under paragraph 207 of the NPPF. Significance is defined in the NPPF 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'.

3.4.9 Further information is provided in the PPG which defines each of the heritage interests as follows:

'Archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point;

Architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture; and

Historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity'.

3.4.10 These terms are used in the following assessment of the significance of the heritage assets that may be affected by the Site's proposed development.

3.5 Assessment of Significance

Abbey Church of St Mary and St Aldhelm, Grade I

3.5.1 **Description:** The Abbey Church of St Mary and St Aldhem (NHLE:1202129), positioned on an elevated, flat plateau in the higher, northern part of the historic core of Malmesbury, is a Grade I listed building that was designated on 18th January 1949. The Church was founded c.637 and the monastery was founded during the abbacy of Alhelm (675-705), though no extant remains survive.

3.5.2 The surviving extant elements of the Abbey Church date from c.1160-1180. No tower survives but the remaining elements, dominated by the surviving section of the nave, are in an elevated position so that the building is the dominant landmark building in the historic core of Malmesbury. It is readily viewed from most directions including from the northeast within The Worthie]. There are views of the Church from the southern portion of the Site to the west of Whychurch Farm.

3.5.3 The listing citation notes that the Church includes:

'A 9-bay aisled nave, transepts with E chapels, chancel, ambulatory with 3 radiating chapels, and S porch, rebuilt 1350-1450 above gallery level with clerestory, vault, crossing spire and W towers, a lengthened chancel and Lady Chapel; spire fell 1479. After Dissolution nave altered by William Stumpe of Abbey House and damaged W parts walled for the parish church, W tower fell c.1662, W window by Goodridge 1830, restored W end 1903. MATERIALS: limestone ashlar with stone tiles. STYLE: late Romanesque style C12 work, Decorated Gothic style C14 extensions. PLAN: reduced since the Dissolution to 6 E bays of nave, with short lengths of

transept walls and S corner of W end. EXTERIOR: the E end has a single N chancel bay and matching chancel arch with paired half shafts set in square piers with quarter round capitals, beneath the 2-centre arched line of the vault, and tas-de-charges with sunken mouchettes; the jambs of next E bay has matching aisle and triforium semi-circular jambs with chevron mouldings. Inner wall of N transept has blocked 2-centred aisle arch containing a C16 doorway and 3-light mullion window, and a blind round-arched doorway to the right; 6-bay N elevation has a blind former cloister wall along the aisle divided by buttresses, with a roll-top coping, and round-arched windows above a cill band containing C14 tracery, with a steep gable in the fourth bay containing a 3-light Decorated tracery window; at the left end is a blocked, round-arched C12 doorway with an archivolt of relief palmettes, and a cusped cinquefoil arch set within. The C14 clerestory has flying buttresses with tall pyramidal pinnacles between 3-light 2-centre arched windows, 2-light at the E end, with paterae to each side of the three E windows. S transept as N, 2 bays after the aisle arch, an incomplete arcade of interlacing round arches with a chevron moulding beneath 2 storeys of round-arched windows with splayed reveals, the lower windows flanked by narrow round-arched recesses containing inner arches open to a passage through the walls. The arcade continues along the former external side of the S transept and to the 9-bay S elevation, otherwise as the N side with a Decorated cusped openwork parapet to aisle and nave, and with second and third bays from E containing C14 2-centre windows with Decorated tracery. C12 porch rebuilt externally in C14 with angle buttresses, has a very fine splayed round-arched entrance of 3 orders, without capitals, richly carved with iconographic Biblical scenes set in oval panels, and separated by richly carved mouldings, and a hood with dog head stops. [...] The incomplete W end has a massive clasping buttress stair turret to the S corner in 4 stages separated by moulded strings, blank from the ground, a pair of blind round-arched panels containing lower arched panels to the second stage, an arcade of narrow interlacing round-arches to the third, and a taller arcade to the fourth stage with square section mouldings; the bay to the left as the S aisle, with a pair of round arches with flanking half arches at the second stage enriched with chevron moulding, containing pairs of round-arches; above is an arcade of 5 round-arches, and a blind wall topped with a C20 parapet. The S side of the central entrance bay has the jamb of a round-arched entrance with 2 orders carved as the S porch and plain capitals, beneath the jamb of a large C14 W window with the springers of 4 cusped transoms'.

- 3.5.4 **Significance:** The Abbey Church of St Mary and St Aldhem is an asset of very high national significance, which is reflected in its designation as a Grade I listed building. Only 2.5% of all listed buildings in England are designated at this grade; all are of exceptional historic and/or architectural special interest. As such the asset gains a great deal of its very high significance from its own fabric and form, which is of exceptional architectural and historic interest.
- 3.5.5 Additional primary contribution to the asset's significance is gained as the town's enduring landmark historic building and at the historic ecclesiastical core of Malmesbury. It is at the centre of historic and current (Anglican) Christian worship in the town, for which it continues to serve as the town's parish church. The Church is positioned in an elevated position such that the building is the dominant landmark building in Malmesbury and is readily viewed from many directions above skyline of the dense built form of the town. Malmesbury's heritage is also a draw to visitors to the town, with the Abbey Church the primary attraction.
- 3.5.6 **Setting:** The Abbey Church is Malmesbury's primary landmark building, even when lacking a tower. The asset's immediate setting is the open graveyards to the north and south of the building with the gardens of Abbey House to the east. The Church's intermediate setting takes in much of the town's historic centre (largely reflected by the extent of Malmesbury Conservation Area), is accordingly broad and, as a whole, makes a strong contribution to its significance. The town's dense, close-knit urban form set on the promontory between the river valleys, with a consistently homogeneous materiality and palette, provides a tight framing setting to the east, west and south of the asset.

- 3.5.7 The asset's town setting is framed to the north by the wooded northern slopes and edge of the river valley with the treed southern margin to The Worthies. Beyond this edge is open countryside to the northeast; this is comprised predominantly of The Worthies with open countryside providing a green backdrop with a minimal depth of field. Consequently, the southern edge of the Site forms a small part of the outer edge of the asset's wider setting.
- 3.5.8 From within the southern part of the Site to the west of Whychurch Farm, there are views afforded of the Abbey Church. It is discernible as an historic Gothick-style ecclesiastical building and the landmark building south of the Site within the historic core of Malmesbury. As such, there is some legibility of the asset's significance from the southern portion of the Site to the west of Whychurch Farm. Additionally, the Site has a residual, historic association with the Abbey as former Abbey lands.
- 3.5.9 With a building of such exceptional architectural quality, allied with a profound historic interest, embedded in its fabric, form and architectural style, it is somewhat inevitable that the setting, by comparison to the values embedded in the building itself, offers a comparatively lesser degree of contribution to the asset's significance. However, the Abbey and the historic core of the town are inextricably linked, with much of their historic development largely directly related. Consequently, the asset's immediate and intermediate setting, in the form of the historic core of Malmesbury, provides an important degree of contribution to the Abbey Church's significance.
- 3.5.10 **Contribution of the Site:** The Site is c.11.7 hectares in area and formed of three fields under pasture to the northeast of the Abbey Church. At its nearest point, its south-western corner, the Site is c.670m from the Church. From most of the Site there is no inter-visibility with the Church. There is a clear, if distant view of the asset from the southern portion of the Site to the west of Whychurch Farm. There is a degree of appreciation of the asset's significance – it is clearly a large, mass-masonry historic building of Gothick styling - from the southern portion of the Site to the west of the farmstead.
- 3.5.11 There is no visibility of the Site from ground level at the Church. However, in sequential views that take in the Abbey Church and the southern edge of the Site, this extremely limited portion of the Site delivers a minimal contribution to the green back-drop to the open, green wider setting provided to the northwest of the asset by The Worthies. The Site provides a small part of the outer northern edge of the asset's wider setting.
- 3.5.12 It is concluded that the Site currently provides an aggregate low level of contribution to the asset's significance, as a small part of the northern margin to its wider setting beyond The Worthies, and affords a low level of legibility of the asset's significance from limited parts of the Site.

Whychurch Farmhouse (NHLE 1269337)

- 3.5.13 Whychurch Farmhouse was designated at Grade II 24th July 1992. It was built c.1675 by William Ivey on the site of an earlier church. It is a two-storeyed house of coursed limestone rubble and pantile roof that exhibits a near symmetrical, early Classical proportions over four bays to its main elevation (south), though the fenestration, excepting one twentieth-century insertion, is formed in small three and four-light stone mullioned windows with drip mouldings over, which stylistically are pre-Georgian [Plate 1]. There is an eighteenth-century rear extension, a late eighteenth-century porch and a pediment added to the façade.
- 3.5.14 The listing citation notes that the Farmhouse is of a:
- '3-unit central-entry plan; rear stair turret with access from parlour on left; service end on right has C18 wing built on to rear. 2 storey; almost symmetrical 4-window range. Late C18 pedimented stone porch built onto C17 chamfered segmental-arched doorway with original ironmongery to C18 4-panel door. Late C18 pediment to centre. Hood moulds over 3- above 4-light hollow-chamfered stone-mullioned widows; C20 inserted window to ground floor on right. Similar windows to other elevations, and to gable end of C18 rear wing. The left (S) return gable*

has string course, plinth and straight joints: these relate to the surviving part of the medieval chapel'.

- 3.5.15 The wider farmstead, largely to the west and northwest, includes further eighteenth-century elements, discussed below, and numerous later nineteenth and twentieth-century additions. There has been a great deal of change to the farmstead through these centuries, but the steading is largely based on a main farmyard to the northwest of the Farmhouse and a further yard to the south of this, where much of the most recent large-scale twentieth-century stock shed and barns have been added.
- 3.5.16 **Significance:** Whychurch Farmhouse is an asset of high, national significance, which is reflected by its designation. As such the asset primarily derives its high significance from its own fabric and form which is of architectural and historic special interest. There is a notable group value derived from adjacent farm buildings arranged to the west and northwest.
- 3.5.17 **Setting:** The asset's immediate setting is the front garden and, to the rear, the former orchard which now is populated with a dense collection of mature non-fruit trees that largely screen the rear of the Farmhouse to the north. The asset's intermediate setting takes in the ancillary and directly functional elements of the rest of the farmstead. These elements of the asset's setting deliver a strong contribution, as a group value, to the Farmhouse's significance.
- 3.5.18 The asset's wider setting is the open land that surrounds the farmstead. This is limited to the east with the bypass and twentieth-century housing along Milbourne Lane, and to the north with ribbon development along Crudwell Road. The open land to the south is provided by The Worthies, with the backdrop of the distant Abbey Church and the wooded lip to the valley edge. The Site provides open farmland to the north and northwest of the farmstead, which has an historic and current functional and ownership association with the asset. The Site's larger southern field forms the open swathe of farmland that forms the bulk of the asset's wider setting to the north and northwest. To the west of the Site is the backdrop of the 1990s' residential development centred on Webbs Way.
- 3.5.19 **Contribution of the Site:** The Site is c.11.7 hectares in area and formed of three fields under pasture to the north and northwest of the farmstead. The Site has an historic and current functional and ownership association with the asset. The Farmhouse is wholly screened from the Site's western and northern fields. There is filtered intervisibility of the asset, of aspects of the building's rear and western elevations – most particularly elements of the asset's roof, from the south-eastern portion of the Site with screening delivered by the noted trees and other buildings in the farmstead.
- 3.5.20 The asset primarily derives its high significance from its own fabric and form. The asset's immediate and intermediate settings – taking in the farmstead - delivers a strong contribution, as a group value, to the Farmhouse's significance. It is concluded that the Site provides an aggregate low-moderate secondary level of contribution to the asset's significance, as a part of the asset's wider setting and in terms of an enduring historic functional and ownership association. The Site affords a low level of legibility of the asset's significance from the south-eastern portion of the Site.

Outbuilding to west north-west of Whychurch Farmhouse

- 3.5.21 The Outbuilding (NHLE:1269338) was designated at Grade II 24th July 1992. A date of 'Nov. 2nd 1798' on lead work could reflect its construction date. It first appears on historic mapping in 1803 [Fig.3]. It is an elongated range on the east side of the main farmyard to the immediate northwest of Whychurch Farmhouse. It is formed in Flemish bonded brick with stone-slate roof finishing. It comprises three elements (as detailed on the 1886 mapping [Fig.5]), a three-storey, centrally positioned and square-planned store and dovecote with a hipped roof is symmetrically flanked by single-storey stock sheds. The dovecote element is readily apparent in views from the Site's larger field, though the flanking sheds are largely difficult to pick out in the multi-phased collection of farm buildings.
- 3.5.22 The listing citation notes that the Outbuilding has a:

'Rectangular plan with 1-storey shelter sheds flanking 3-storey dovecote/store with hipped roof. 6-bay shelter sheds originally open-fronted but retaining circular brick piers. Dovecote/store has 2 semi-circular arched ground floor doorways with stone key and impost blocks. Stone lozenge shaped panels; 2 string courses to upper floor; entry to rear. Principal-rafter roof with butt purlins. Doveholes to top-floor dovecote. A good example of a farm building range of the Age of Improvement, clearly influenced by the work of architects such as Samuel Wyatt'.

- 3.5.23 The wider farmstead, largely to the west and south, includes nineteenth and twentieth-century additions. There has been a great deal of change to the farmstead through these centuries, but the steading is largely based on a main farmyard, of which the asset forms the eastern range, a Farmhouse to the south-east and a further yard to the south, where much of the most recent large-scale twentieth-century stock shed and barns have been added.
- 3.5.24 **Significance:** The Outbuilding is an asset of high, national significance, which is reflected by its designation. As such the asset primarily derives its high significance from its own fabric and form which is of architectural and historic special interest. There is a notable group value derived from adjacent farm buildings and the listed Farmhouse.
- 3.5.25 **Setting:** The asset's immediate setting is the main courtyard it addresses. The asset's intermediate setting takes in the Farmhouse and its associated grounds to front and rear, the ancillary and directly functionally associated elements of the rest of the farmstead. These elements of the asset's setting deliver a strong contribution to the Outbuilding's significance.
- 3.5.26 The asset's wider setting is the open land that surrounds the farmstead. This is limited to the east with the bypass and twentieth-century housing along Milbourne Lane (and is largely visually screened off in this direction), and to the north with ribbon development along Crudwell Road. The open land to the south is provided by The Worthies, but again is largely screened from this area due to intervening farm buildings, although the building's dovecote is legible as a notable part of the farmstead's roofscape from The Worthies.
- 3.5.27 The Site provides open farmland to the north and northwest of the farmstead, which has an historic and current functional and ownership association with the asset. The Site's larger southern field forms the open swathe of farmland that forms the bulk of the asset's wider setting to the north and northwest. To the west of the Site is the backdrop of the 1990s' residential development centred on Webbs Way. There is no intervisibility between the asset and the Site's western and northern fields.
- 3.5.28 **Contribution of the Site:** The Site is c.11.7 hectares in area and formed of three fields under pasture to the north north-west of the farmstead. The Site has an historic and current functional and ownership association with the asset. The Outbuilding is, to a degree, somewhat subsumed into the built form of the farmstead and there is negligible intervisibility from the Site's western and northern fields. However, from the Site's large southern field there is notable inter-visibility with the asset's three-storey dovecote element and strong intervisibility from much of the south-eastern portion of the Site.
- 3.5.29 The asset primarily derives its high significance from its own fabric and form. The asset's immediate and intermediate settings – taking in the farmstead - delivers a strong contribution, as a group value, to the Outbuilding's significance. It is concluded that the Site provides an aggregate low-moderate secondary level of contribution to the asset's significance, as a part of the asset's wider setting and in terms of an enduring historic functional and ownership association. The Site affords a moderate level of legibility of the asset's significance from the large southern field and a strong level from the south-eastern portion of the Site.

Malmesbury Conservation Area

- 3.5.30 Malmesbury Conservation Area was designated May 1971. The Area was extended in 1987 to take in the river valleys surrounding the town. The Area was further extended in 2006 to include land at Burnham Road, Bristol Street and Foxley Road.

- 3.5.31 As set out in Conservation Area Appraisal (CAA), the character and appearance of Malmesbury is derived primarily from its unique and dramatic location. The converging Tetbury and Sherston branches of the River Avon almost fully encircle the town, with Abbey Row running on a ridge or high promontory between the two. The high land between the rivers gives the town an enclosed, almost island like feel and was a natural position for a fortified town. The topography and rivers have ensured the town has retained a compact and close-knit urban form that has remained free from more modern, lower density development. The town's built form, despite its elevated position at its centre, is generally low in height, with buildings commonly two or three storeys in height. Further homogeneity of appearance is delivered by a common palette and materiality of the buildings. The river valleys are as an important component of the town as the built form itself. The valleys and their edges contain much mature vegetation that is important to the setting of the town.
- 3.5.32 The town and Abbey Church are often visible from some distance, the hinterland to the town being generally flat and level, including to the north, east and south. Most routes into the town provide, at some point, a view of the Abbey Church. The river valleys and associated vegetation are important elements of such views but the town, in terms of the skyline of its northern margin, is visible from the Site's large southern field to the west of Whychurch Farm. Other than the Abbey Church, the primary landmark building in the Area, the significance of no other element of the Conservation Area is legible from the Site.
- 3.5.33 Malmesbury Conservation Area is a spatially very large heritage asset, being over 80 hectares in area. The Conservation Area is a heritage asset of high local significance. From much of the Site there is no intervisibility with the Conservation Area. There is some appreciation of the Abbey Church's significance from the Site's large southern margin to the west of Whychurch Farm [analysed above]; there is no meaningful appreciation of the character and appearance (significance) of any other part of the Conservation Area.
- 3.5.34 There is no visibility of the Site from ground level in the Conservation Area. However, in sequential views that take in the Abbey Church and the southern edge of the Site, this portion of the Site provides a very small contribution to the green back-drop to the open, green wider setting provided to the northwest of the Abbey Church by The Worthies. The Site provides a small part of the northern outer edge of only this element of the Conservation Area's wider setting. As such, the Site currently provides a negligible contribution to the Malmesbury Conservation Area's character and appearance (significance).

4 PROPOSALS AND ASSESSMENT OF IMPACT

4.1 Introduction

- 4.1.1 The following section provides an assessment of the potential impacts on the identified built heritage assets' significance arising from the proposed development of the Site.

4.2 Proposals

- 4.2.1 The proposed development, as set out in the planning application, comprises residential development with associated landscaping and infrastructure (road infrastructure, allotments, amenity green space, natural green space, play space and SUDS). The Site area is c.11.7ha.

4.3 Assessment of Impact

- 4.3.1 The proposed development scheme will have no direct physical impact on the significance of any of the built heritage assets identified above, with any potential impacts to those identified assets occurring as a result of new development falling within a part of an asset's setting.

Abbey Church of St Mary and St Aldhelm

- 4.3.2 **Significance:** The Abbey Church of St Mary and St Aldhelm is an asset of very high, national significance reflected by its Grade I designation. The asset gains a great deal of its very high significance from its own fabric and form as exceptional architectural, artistic and historic interest. Additional primary contribution to the asset's significance is gained from its immediate and intermediate setting formed of Malmesbury's townscape and the surrounding river valleys.
- 4.3.3 **Contribution of the Site:** The Site at its nearest point, its south-western corner, is c.670m from the Church. From most of the Site there is no inter-visibility with the Church. There is a clear, if distant view of the asset from the southern portion of the Site to the west of Whychurch Farm. From this area is a degree of appreciation of the asset's significance – it can be seen as a large, mass-masonry historic building of Gothick styling. The Site represents a small part of the northern edge of the green backdrop to the asset's wider setting. As such, the Site currently provides a low level of contribution to the asset's significance.
- 4.3.4 **Impacts on Significance:** The proposed development will include the introduction of built form into the Site's large southern field and, as such, will introduce a skyline of built form to a very small part of the northern edge to the currently green backdrop to the asset's wider setting. This will deliver a low level of harm, within the spectrum of less than substantial harm, to the significance of the Church of St Mary and St Aldhelm.

Whychurch Farmhouse

- 4.3.5 **Significance:** Whychurch Farmhouse is an asset of high, national significance, which is reflected by its Grade II designation. As such the asset primarily derives its high significance from its own fabric and form which is of architectural and historic special interest. There is a notable group value derived from adjacent farm buildings arranged to the west and northwest of the Farmhouse.
- 4.3.6 **Contribution of the Site:** The Site has an historic and current functional and ownership association with the asset. The Farmhouse is wholly screened from the Site's western and northern fields. There is filtered intervisibility of the asset, of aspects of the building's rear and western elevations – most particularly elements of the asset's roof, from the south-eastern portion of the Site. The screening is delivered by the noted trees and other buildings in the farmstead. The Site provides an aggregate low-moderate secondary level of contribution to the asset's significance, as a part of the asset's wider setting and in terms of an enduring historic functional and ownership association. The Site affords a low level of legibility of the asset's significance from the south-eastern portion of the Site.

- 4.3.7 **Impacts on Significance:** The proposed development will include the introduction of built form into the Site's large southern field and, as such, will introduce built form to much of the northern part of the asset's wider setting. This will deliver a low-moderate level of harm, within the spectrum of less than substantial harm, to the significance of Whychurch Farmhouse.

Outbuilding to west north-west of Whychurch Farmhouse

- 4.3.8 **Significance:** The Outbuilding is an asset of high, national significance, which is reflected by its Grade II designation. As such the asset primarily derives its high significance from its own fabric and form which is of architectural and historic special interest. There is a notable group value derived from adjacent farm buildings arranged to the west and northwest of the Farmhouse.
- 4.3.9 **Contribution of the Site:** The Site has an historic and current functional and ownership association with the asset. The Outbuilding is, to a degree, somewhat subsumed into the built form of the farmstead and there is negligible intervisibility from the Site's western and northern fields. However, from the Site's large southern field there is notable intervisibility with the asset's three-storey dovecote element and strong intervisibility from much of the south-eastern portion of the Site. The asset primarily derives its high significance from its own fabric and form. The Site provides an aggregate low-moderate secondary level of contribution to the asset's significance.
- 4.3.10 **Impacts on Significance:** The proposed development will include the introduction of built form into the Site's large southern field and, as such, will introduce built form to much of the northern part of the asset's wider setting. This will deliver a moderate level of harm, within the spectrum of less than substantial harm, to the significance of the Outbuilding.

Malmesbury Conservation Area

- 4.3.11 **Significance:** Malmesbury Conservation Area is an asset of high, local significance. The character and appearance of the Area is derived primarily from its unique and dramatic location on a promontory between two converging river valleys. This gives the town an enclosed, almost island like feel and has ensured that the historic core of Malmesbury has retained a compact and close-knit urban form that has remained free from more modern, lower density development. The town's built form, despite its elevated position at its centre, is generally low in height with buildings commonly two or three storeys in height. Further homogeneity of appearance is delivered by a common palette and materiality. The river valleys are an important component of the town as the built form itself. The valleys and their edges contain much mature vegetation that is important to the setting of the town. The Abbey Church is the Area's primary landmark building.
- 4.3.12 **Contribution of the Site:** Malmesbury Conservation Area is a heritage asset of high local significance. From much of the Site there is no intervisibility with the Conservation Area. There is some appreciation of the Abbey Church's significance from the Site's large southern margin to the west of Whychurch Farm; there is, however, no meaningful appreciation of the character and appearance of any other part of the Area. The Site provides a small part of the northern outer edge of only this element of the Area's wider setting. As such, the Site currently provides a negligible contribution to the Malmesbury Conservation Area's character and appearance (significance).
- 4.3.13 **Impacts on Significance:** The Site represents a small part of the northern edge of the green backdrop to the asset's wider setting. The proposed development will include the introduction of built form into the Site's large southern field and, as such, will introduce a skyline of built form to a very small part of the northern edge to the currently green backdrop to the asset's huge wider setting (the asset itself is over 80ha. in area). The Site's proposed development will deliver a negligible level of harm to the significance of Malmesbury Conservation Area.

5 CONCLUSION

- 5.1 This Built Heritage Statement has been researched and prepared by RPS Consulting UK, on behalf of Gleeson Land to assess the potential impacts on the historic built environment arising from a proposed residential development of land north of Whychurch Farm and west of Crudwell Road, Malmesbury, Wiltshire. The Site is centred on NGR ST 93708 88191 and is c.11.7 hectares in area. The Statement is produced to support the submission of the planning application for the Site. This built heritage statement meets the requirements of the NPPF and relevant Local Plan policy.
- 5.2 There are no built heritage assets, designated or non-designated, within the Site. The Site is potentially in the setting of two designated built heritage assets at Whychurch Farm close to the Site's southern boundary near to its south-eastern corner. These comprise Whychurch Farmhouse (Grade II) and an outbuilding to the northwest of Whychurch Farmhouse (Grade II). Furthermore, at a much greater distance, the Site is also potentially within the setting of a number of designated built heritage assets in the historic core of Malmesbury to the south and southwest. These include the Abbey Church of St Mary and St Aldhelm (Grade I); St Paul's Bell Tower (Grade I); and Malmesbury Conservation Area.
- 5.3 This built heritage statement meets the requirement under paragraph 200 of the National Planning Policy Framework (NPPF) for the applicant to explain the significance of potentially affected heritage assets and demonstrate the impact that the proposal would have upon that significance. The statement refers, as necessary, to the relevant legislative framework contained within the Planning (Listed Buildings and Conservation Areas) Act 1990 and the Levelling Up and Regeneration Act 2023, as well as national and local planning policy. In addition, relevant Historic England guidance has been consulted to inform the judgements made, notably Historic England's GPA3 *The Setting of Heritage Assets*.
- 5.4 This statement concludes that the proposed development of the Site will result in a degree of harm to the significance of the Grade I Church of St Mary and St Aldhelm; the Grade II Whychurch Farmhouse; and the Grade II Outbuilding at Whychurch Farm. Specifically, the identified levels of less than substantial harm are concluded to be low to the Church; low-moderate to the Farmhouse; and moderate to the Outbuilding. No other built heritage assets will have their significance affected by the proposed development.
- 5.5 As such, the identified levels of harm, within the spectrum of less than substantial harm, to the designated assets' significance needs to be afforded great weight and weighed with the public benefits of the proposal, as set out in paragraph 208 of the NPPF. This paragraph does not direct the decision maker to refuse an application causing less than substantial harm, unlike with paragraph 207 covering cases of substantial harm. The decision maker will need to carry out the statutory test. That is, to consider keeping the significance of the three identified designated built heritage assets from the noted level of harm. The levels of harm will also need to be seen to be clearly and convincingly justified by the identified public benefits of the proposed development.
- 5.6 The planning statement submitted with the application sets out that the public benefits of the proposed development will outweigh the harms identified to the significance of the Church of St Mary and St Aldhelm; Whychurch Farmhouse; and the Outbuilding at Whychurch Farm. The planning statement also sets out a clear and convincing justification of that harm that flows from the outcome of that weighing exercise. As such, there can be no material objection to the development proposals set out in the submitted application in relation to built heritage matters.

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Cartographic

1773 Andrews and Drury map

1803 Manor of Whytchurch cum Milbourne

1840 Malmesbury Tithe Map

1866 Ordnance Survey 1:2,500 mapping

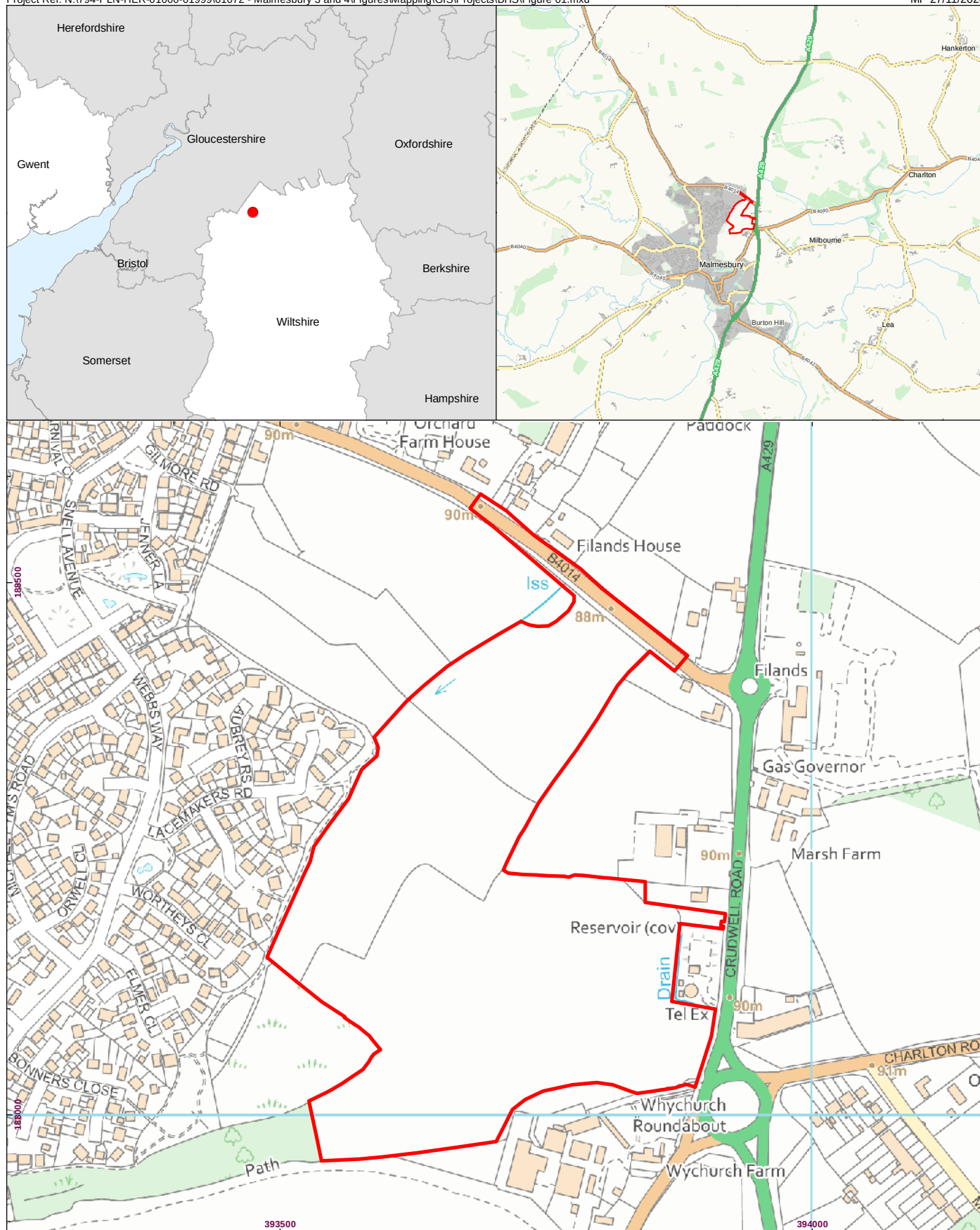
1921 Ordnance Survey 1:2,500 mapping

1979 Ordnance Survey 1:2,500 mapping

1983 Ordnance Survey 1:50,000 mapping

2011 Ordnance Survey 1:2,500 mapping

FIGURES



Site Boundary

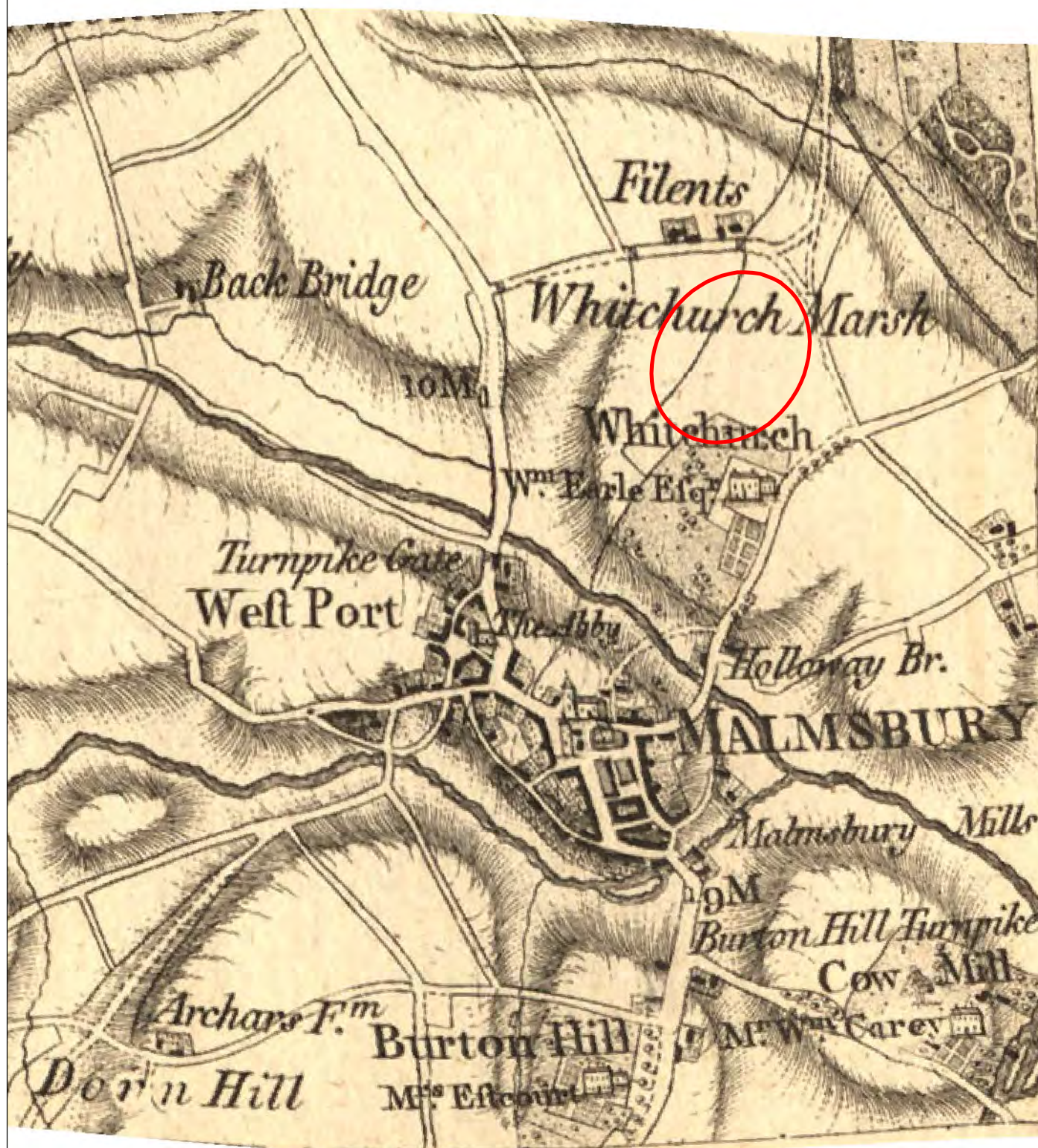


0 50 100m
Scale at A4: 1:5,000

rps MAKING
COMPLEX
EASY

Figure 1

Site Location



Approximate Site Location



0 100 200 300m

Scale at A4: 1:15,000 approx.



Figure 3

1773 Andrews and Drury



 Site Boundary



0 50 100m
Scale at A4: 1:4,000

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Figure 3

1803 Manor of Whitchurch Cum
Milbourne



 Site Boundary

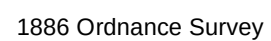


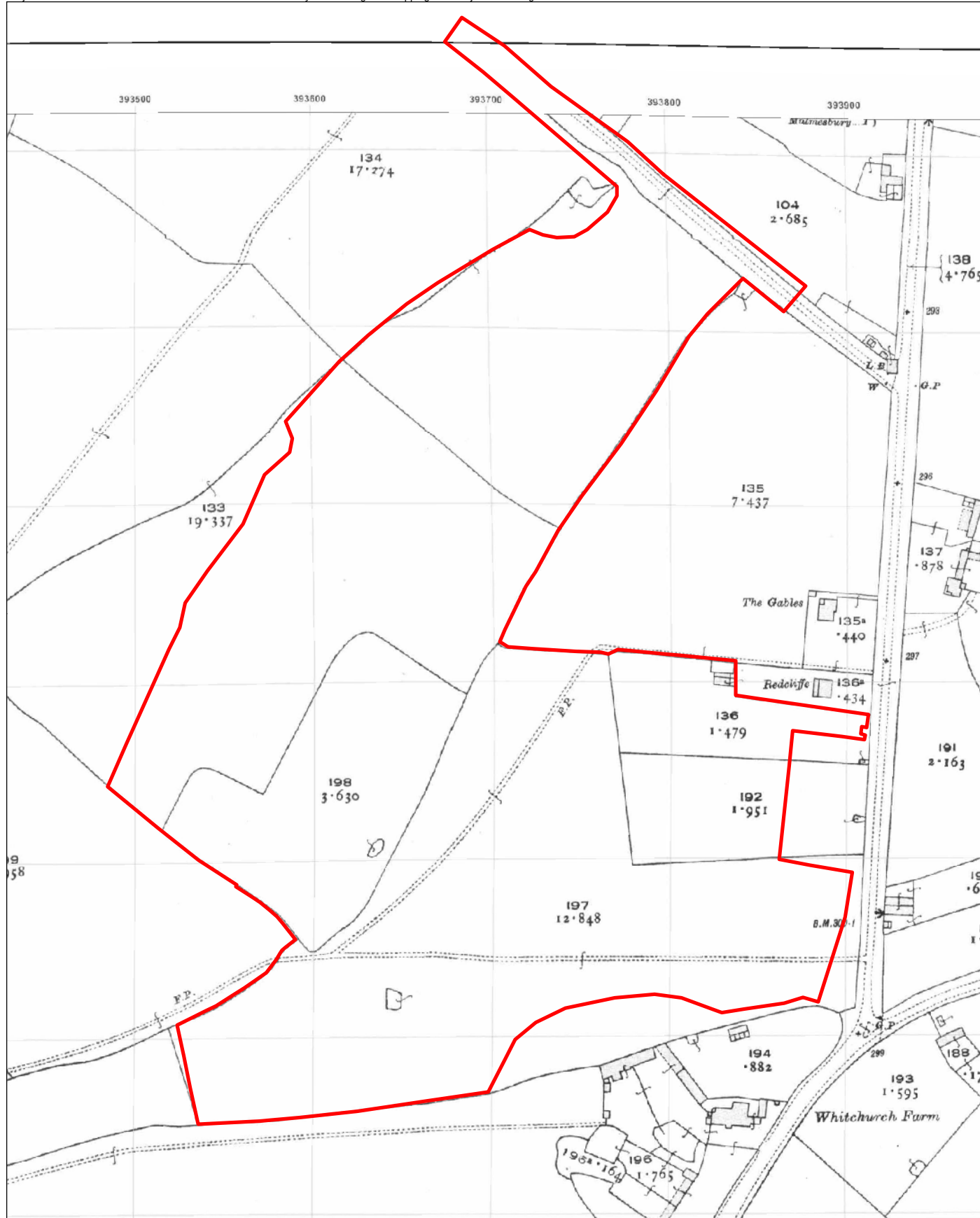
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Figure 4

1840 Malmesbury Tithe Map





Site Boundary



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Scale at A4: 1:3,000

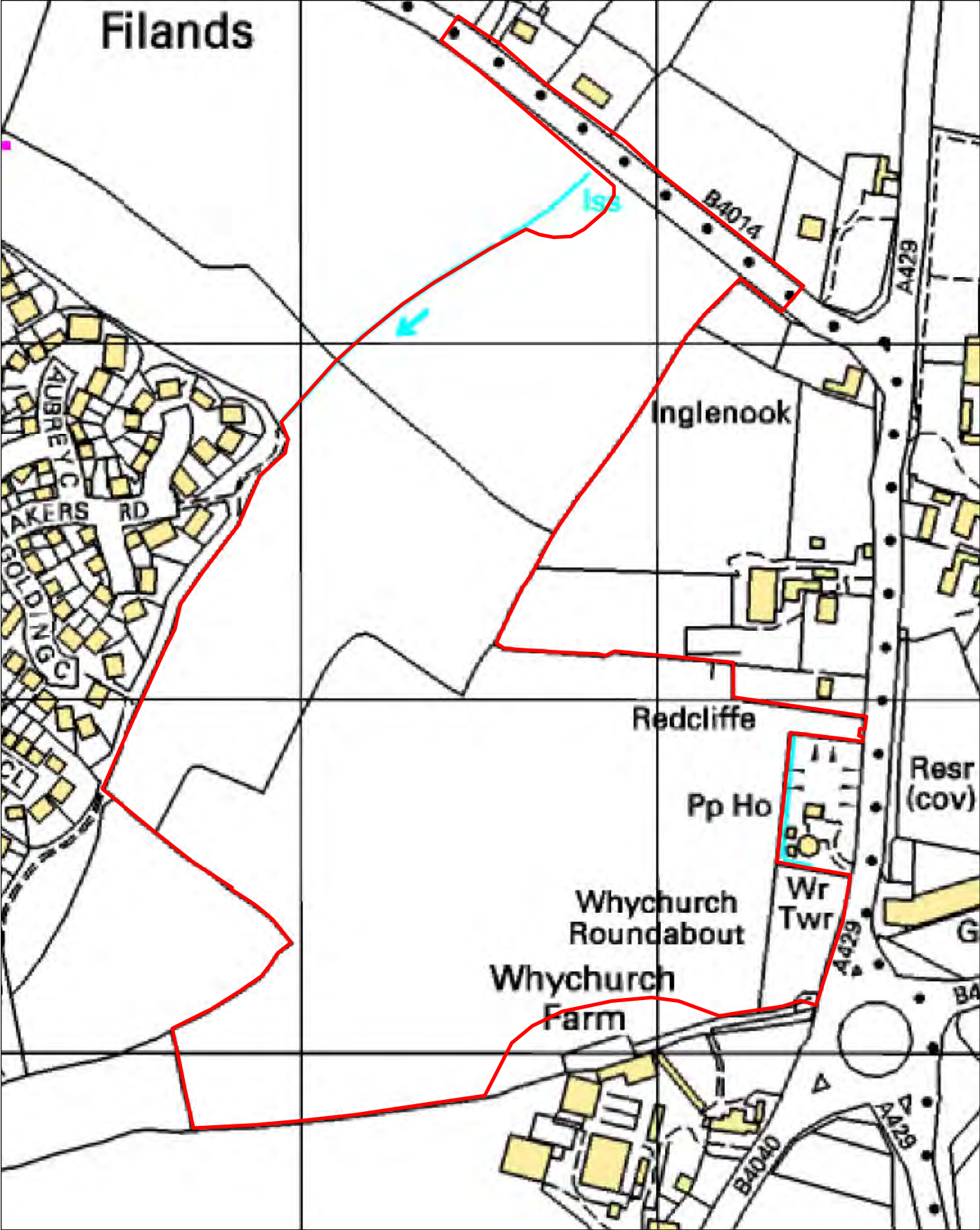
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Figure 6

1921 Ordnance Survey



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Site Boundary



0 25 50 75m
Scale at A4: 1:3,000



Figure 8
2011 Ordnance Survey



 Site Boundary



0 25 50 75m
Scale at A4: 1:3,000



Figure 9

2019 Aerial Photograph
(GoogleEarth)



rpsgroup.com