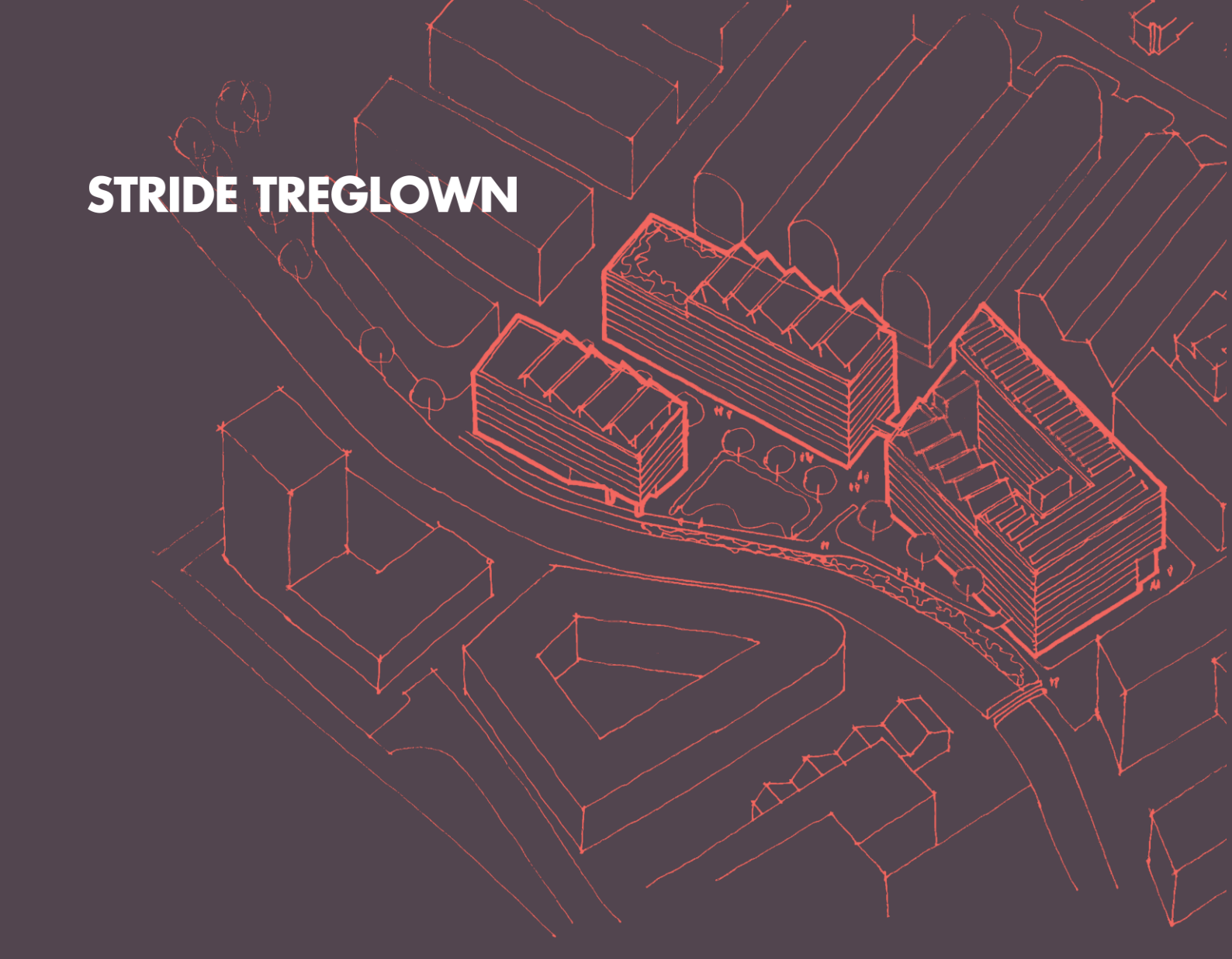




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Corporation

Heritage Statement

CPUK Factory Building | November
2025

CLIENT

Cereal Partners UK

JOB TITLE

Whitehorse Factory

LOCATION

Staverton, Trowbridge

POSTCODE

BA14 6PG

JOB NO.

157027

DATE

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1. Introduction

1.1. Scope of Heritage Statement

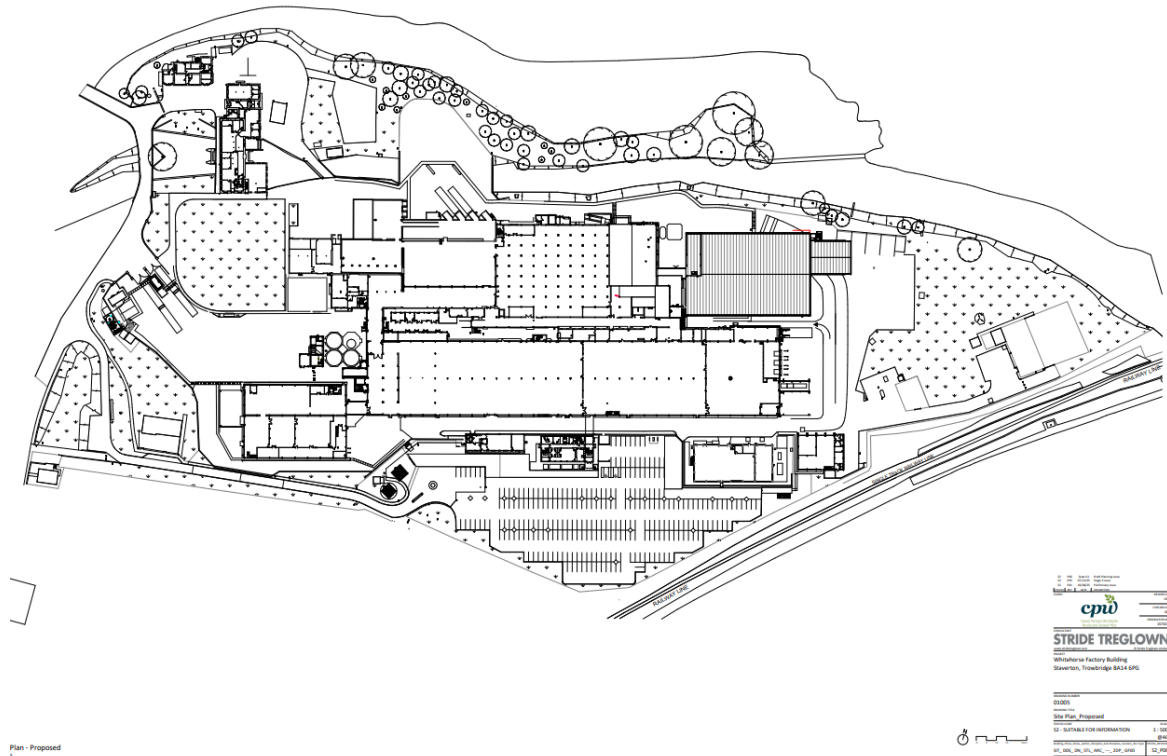
- 1.1.1 This Heritage Statement identifies the relevant national and local planning policies together with the designated and non-designated heritage assets that are important considerations in the assessment of the proposed construction of a new 2,400sqm factory building at the Cereal Partners Factory in Staverton, Trowbridge. This statement also assesses the impact of the proposed scheme upon the identified assets.
- 1.1.2 This Statement should be read alongside the Planning, Design and Access Statement provided as part of this planning application submission.
- 1.1.3 The proposed development will not have a direct physical impact upon the heritage assets identified within this statement. However the introduction of new built form in proximity to the following heritage assets has the potential to impact upon their setting. The impact of the proposed development on the setting of these assets is assessed within this statement. This statement also provides a desk top summary of the archaeological potential of the site.
- Weselyan Chapel – Grade II
 - The Old Bear Inn – Grade II
 - Gates, gate piers and overthrow at Churchyard of Church of St Paul – Grade II
 - Church of St Paul – Grade II
 - Road Bridge – Grade II

1.2. Site Location and Description

- 1.2.1 The existing CPMK food manufacturing campus is situated on the eastern side of the B3105 road and on the northern outskirts of the village of Staverton, Trowbridge. The main industrial buildings and service yards are located to the south of the site.
- 1.2.2 The area of the campus within which the new factory building will be accommodated is located to the north east of the campus. The area consists of existing hardstanding (currently used as a service yard) and is bound to the south and west by existing factory buildings, the River Avon to the north, and external storage to the east.

2. The Proposed Development

- 2.1.1 The proposed development will provide a circa 2400m² extension to the existing factory at Staverton, producing 'ready to eat' breakfast cereals. The new building will provide additional space to receive raw materials and to produce and package finished goods for onward transportation to distribution centres. The expansion to the factory is expected to lead to an increase in staff numbers of approximately 50 new staff and to result in approximately 21 additional deliveries daily. The aim of the new structure is to return the levels of production on site back to historical peak levels from around 2020.
- 2.1.2 The new building will be located in a currently vacant area of the campus, away from the public highway and nearby dwellings whilst maintaining appropriate access and turning space for HGVs. Due consideration has been given to maintaining appropriate separation distances from the nearby watercourse and tree roots.
- 2.1.3 To achieve increased production the manufacturing process needs to flow through the building. The supply of goods will occur at one end of the building and packaging and distribution takes place at the other. The flow through the building is linear to accommodate the production lines along the length of the factory.
- 2.1.4 The proposed site plan is provided at Figure 2 opposite and full details of the development proposals are contained within the accompanying Planning, Design and Access Statement.



3. Planning Policy Context

3.1.1 This section identifies the key national and local planning policies of relevance to the site and proposed development.

3.2. National Planning Policy Framework (NPPF 2024)

3.2.1 Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990).

3.2.2 The National Planning Policy Framework (NPPF) centres on a “presumption in favour of sustainable development”. This is seen as key to both “plan making” and “decision taking”.

3.2.3 The National Planning Policy (NPPF) glossary (Annex 2) provides definitions for various terms. In respect of heritage, the NPPF provides the following clarifications:

- “Heritage Assets” means; *“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral”.*
- “Setting” means; *“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral”.*
- “Significance (for heritage policy)” means; *“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. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance”.*

3.2.4 Section 16 of the NPPF entitled: ‘Conserving and enhancing the historic environment’ is the relevant section relating to heritage considerations. A number of the paragraphs within this section are relevant, as outlined below.

3.2.5 The NPPF outlines that development proposals should include a description of the significance of any heritage assets affected, including any contribution made by their setting (paragraph 207). It also states that in determining applications affecting heritage assets, consideration should be had to the impact of a development proposal on the particular significance of the heritage asset, taking account of the available evidence and any necessary expertise.

3.2.6 Paragraph 203 of the NPPF states; *“Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:*

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*

- *the desirability of new development making a positive contribution to local character and distinctiveness; and*
- *opportunities to draw on the contribution made by the historic environment to the character of a place.*

- 3.2.7 Paragraph 212 states; *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance”.*
- 3.2.8 Paragraph 213 states; *“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional”*
- 3.2.9 Paragraph 214 looks at substantial harm or total loss of significance of a designated heritage asset and paragraph 215 looks at the less than substantial harm to the significance of a heritage asset.
- 3.2.10 Paragraph 219 identifies that local planning authorities should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably”.

3.1. The Planning (Listed Buildings and Conservation Areas) Act 1990

- 3.1.1 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses

3.2. The Local Development Plan

- 3.2.1 The current ‘Development Plan’ for the area is the Wiltshire Core Strategy 2006-2026. The Wiltshire Core Strategy Development Plan Document (‘the plan’) was formally adopted on 20 January 2015. The plan provides a positive and flexible overarching planning policy framework for Wiltshire for the period up to 2026, including the spatial development strategy, allocations for housing, employment and retail development and protection of the environment.
- 3.2.2 Extant heritage policies of particular relevance to the proposed development are set out below.
- 3.2.3 **Core Policy 57 (High Quality Design and Place Shaping)** requires a high standard of design in all new developments including through retaining and enhancing existing important features and being sympathetic to and conserving historic buildings and landscapes.
- 3.2.4 In terms of historic buildings and landscapes, Core Policy 58 (**Ensuring the Conservation of the Historic Environment**) aims to ensure that Wiltshire’s important monuments, sites and landscapes and areas of historic and built heritage significance are protected and enhanced in order that they continue to make an important contribution to Wiltshire’s environment and quality of life. The policy seeks to conserve designated heritage assets and their settings.

- 3.2.5 In accordance with the requirements of the NPPF and local policy, this Heritage Statement has been prepared in support of the application and serves to assess the potential impacts of development and the acceptability of these.

3.3. Guidance

- 3.3.1 Further guidance is provided on heritage and the assessment of heritage assets and can be found in the following documents from Historic England and from the Government. These documents have all been used in the development of the proposed scheme.

The Setting of Heritage Assets (Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (Historic England)

- 3.3.2 This guidance provides advice on understanding setting, and how it may contribute to the significance of heritage assets. It also provides advice on how views contribute to setting and significance of heritage assets.
- 3.3.3 The guidance reiterates the NPPF, highlighting *“that the extent of the setting of a heritage asset ‘is not fixed and may change as the asset and its surroundings evolve’.*” It continues, establishing a stepped approach to decision making which is proportionate to the significance of a particular asset. These steps are:
- 1) Identify which heritage assets and their settings are affected
 - 2) Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated
 - 3) Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it
 - 4) Explore ways to maximise enhancement and avoid or minimise harm
 - 5) Make and document the decision and monitor outcomes

Conserving and enhancing the historic environment (Ministry of Housing, Communities and Local Government) (Updated 22 February 2018)

- 3.3.4 This guidance provides advice on a range of matters from decision taking, designated and non-designated heritage assets through to the advice over statutory consultation relating to different kinds of applications affecting listed building and conservation areas.

4. Identification of Heritage Assets

4.1. Baseline Data Collection

4.1.1 In order to establish the presence of heritage assets a desk-based review of the following sources was undertaken:

- The National Heritage List for England (NHLE)
- Heritage gateway online resource
- Wiltshire Council's online mapping system
- Wiltshire and Swindon Historic Environment Record

4.2. Designated and Non-Designated

4.2.1 There are no designated or non-designated heritage assets within the red line of the proposed development. Local designated heritage assets that are relevant in the consideration of these proposals are identified on Figure 5 opposite and listed below.

- Wesleyan Chapel – Grade II
- The Old Bear Inn – Grade II
- Gates, gate piers and overthrow at Churchyard of Church of St Paul – Grade II
- Church of St Paul – Grade II
- Road Bridge – Grade II



5. Assessment of Significance

Weslyan Chapel

- 5.1.1 This is a Grade II listed Methodist Chapel dating from 1824, constructed of limestone with a slate roof and Y-shaped timber windows and pointed arch openings. Previously used as an office, it was converted to a residential use in 2014 following a period of vacancy.

The Old Bear Inn

- 5.1.2 The "old" Bear Inn, is a Grade II listed building. While specific details about its original founding are limited, it is known to be a stone construction with a slate roof, likely built in a style that dates back several centuries. It features multiple stories and has been a pub with restaurant and function room areas.

Church of St Paul

- 5.1.3 The following extract is taken from the Wiltshire and Swindon History Centre (online resource).
- 5.1.4 The first mention of the Chapel of Ease, situated on the site of the current church, was in the 13th century. Staverton, with Trowbridge, became a peculiar in 1322, known as the 'Honour of Trowbridge', meaning that the churches were exempt from the jurisdiction of Salisbury Diocese. The main church, therefore, would have been St. James' in Trowbridge. By the end of the 16th century the chapel building had been improved, with a tiled roof replacing the original thatch and larger windows installed. By the late 1600s tombs and headstones were being established in the churchyard, and poor boxes installed in the church.
- 5.1.5 The original church building was built of local stone with stone roof tiles and a small bell cote at the west end of the roof. A rectangular nave had a square chancel at the east end, a doorway in the south wall of the chancel and long narrow slit windows. The east window was arch shaped with a central column and elaborate carved stonework at the top and a stained glass window was given by the Hargreaves family, owners of the mill, in memory of their daughter Mary in 1887. The porch, with a pitch roof, was on the south west corner with an arch shaped doorway and stable type door. A further window in the south wall had a simple carved stone design at the top. The interior had about twelve rows of pews seating 60. The font was close to the back wall and the pulpit was against the east wall of the nave.
- 5.1.6 The church was completely rebuilt and enlarged in 1826 adding 120 extra seats and consisting of nave and chancel with the porch added later in 1861. Some of the original stonework was retained, as was the font. New gates were installed in 1829 and extra seating in 1836 which included tiered pews in the south west corner.
- 5.1.7 Some of the church plate is Elizabethan, and includes a cup hallmarked 1577, as well as a paten hallmarked 1855, and a plated flagon and chalice, dated 1932-3, given by Mrs. Julia Blease. One is a copy of the 1577 version. One bell is from the neighbouring factory c.1820. The parish records date back to 1685 and include mention of the Bythesea family including the burial of John Bythesea of Wick House and reference to George Crabbe.
- 5.1.8 St. Paul's amalgamated with St. Mary Magdalene in Hilperton in 1954, a church which had been built by the Wyke family in 1899, and they became known jointly as the Staverton Churches. In 1970 the death was recorded of the last resident vicar of Staverton, Reverend Maunder. The parish then joined with St. Michael's in Hilperton and the vicarage was sold and converted to a care home for the elderly. The church suffered more financial instability in the 1980s and the support of the village was essential for it to remain open. However the closure of St. Paul's was announced in 2010.

Gates, gate piers and overthrow at Churchyard of Church of St Paul

- 5.1.9 Forming part of the curtilage of St Paul's Church, the Historic England list description states;

"Gates, gate piers and overthrow with flanking walls. Mid C19. Dressed limestone. Square piers with saddleback capping to cast- iron overthrown with lantern and plate with name of church. Good cast-iron gates with trefoil cresting. Short lengths of dressed limestone wall with saddleback coping attached to left and right."

Road Bridge over River Avon

- 5.1.10 Understood to originate in late medieval times, the historic England list description confirms that the bridge was likely re-built on several occasions during C18, C19 and C20. Dressed in limestone, the bridge consists of two recessed pointed arches with raised key stones.

6. Impact Assessment

6.1. Introduction

- 6.1.1 Following the identification of the relevant heritage assets in Section 3, this section of the report provides an assessment of the potential impact of the proposed reopening of the Piggery Gate access and associated junction realignments on the identified heritage assets, having regard to the significance of the assets.
- 6.1.2 The NPPF requires, in relation to describing the significance of a heritage asset, 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”.

Weslyan Chapel

- 6.1.3 The proposed new factory building would be set some 300 metres from the Weslyan Chapel and a significant amount of industrial development exists between the site and the heritage asset. The Chapel itself is screened on its northern and eastern boundaries by dense vegetation serving to screen the heritage asset from the factory site to the north east. It is concluded therefore that no direct visual connection at ground level exists between the Weslyan Chapel and the proposed factory site.

The Old Bear Inn

- 6.1.4 Set back over 400 metres from the application site, glimpses of the existing factory building are possible from the Old Bear Inn and its garden curtilage. Greater in height than the proposed factory building, existing buildings will serve to screen the proposed development from the heritage asset. Given the separation distance and the extent of intervening built form and mature landscaping it is considered that the proposed development will not cause any harm to, or loss of, the significance of the Grade II listed building.

Church of St Paul

- 6.1.5 A significant degree of change to the wider setting of the Church of St Paul has occurred following 20th Century development of the Factory site. The immediate setting of the heritage asset has been preserved through adjacent residential buildings constructed broadly at the same time and using a material palette that responds positively to the Church.
- 6.1.6 Although physically separated by the B3105 road, elements of the factory site can be seen from the heritage asset. Otherwise there is negligible intervisibility between the factory site and the heritage asset due to intervening built form and vegetation. It is possible that part of the new factory building will be viewed from the Church but this will be read in the context of the existing industrial buildings meaning that the proposed development would generate a low level of ‘less than substantial’ harm, negligible in degree, to the significance of this Grade II listed heritage asset.
- 6.1.7 The significant public benefits in favour of the proposed development, linked to creation of employment opportunities, local investment, and development of previously developed land in an established industrial site, are considered sufficient to outweigh this low end, less than substantial harm.

Gates, gate piers and overthrow at Churchyard of Church of St Paul

- 6.1.8 The gate and piers, understood to have formed part of the original Churchyard for the Church of St Pauls are located on lower ground to the church, closer to the B3105 road and screened from the factory site by a belt of mature trees and dense vegetation. The intervening built form will completely screen the proposed development from the heritage asset, meaning that no loss to its significance will occur.

Road Bridge over River Avon

- 6.1.9 Located on the approach to the factory site from the north, existing factory buildings are visible from this heritage asset. However the proposed new factory building will be tucked in to the far north eastern corner of the factory site, some 300 metres away from the Grade II listed bridge. Existing buildings are expected to sufficiently screen the proposed development from this heritage asset therefore no loss of significance is expected.

7. Archaeology

- 7.1.1 A review of the Wiltshire and Swindon Historic Environment Record (HER) has identified a low potential for archaeological evidence dating to all periods within the application site.
- 7.1.2 The development of the Study Site from the mid-20th century onwards is likely to have truncated or removed any archaeological remains that may have been present. In the unlikely instance that archaeological remains are present, they are not likely to be of any more than local significance.

8. Conclusions

- 8.1.1 This Heritage Statement identifies and assesses the potential impacts upon nearby heritage assets arising from the proposed development of a new factory building at the north eastern corner of the Cereal Partners UK factory site in Staverton, Trowbridge.
- 8.1.2 This Statement has been prepared in accordance with paragraph 207 of the National Planning Policy Framework, identifying and assessing any heritage assets (both designated and non-designated) which may be affected by the development.
- 8.1.3 This Statement concludes that there will be a low level of less than substantial harm, negligible in degree, to the significance of the Church of St Pauls.

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