



Planning Statement

by Consensus Planning
On behalf of
MCH Minibuses Ltd

Former Barclays Bank, 3 Fore Street, Trowbridge
BA14 8HY

Proposal:
Planning application for the Conversion of the
Existing Listed Building for 2No Two Bed Apartments
and 4No 1 Bed apartments in a new 4-storey
building at the rear

December 2025

Contents

EXECUTIVE SUMMARY	i
1. INTRODUCTION	1
2. SITE AND SURROUNDINGS	2
3. DEVELOPMENT PROPOSAL.....	5
4. PLANNING HISTORY	11
5. PLANNING POLICY CONTEXT	12
The Development Plan	12
National Planning Policy Framework	13
Appropriate Weight	16
6. PLANNING CONSIDERATIONS.....	17
Principle of Development.....	17
Impact upon the Historic Environment	18
Impact upon the Heritage Assets	19
Historic England pre-application advice	22
Impact upon Residential Amenity	24
Accessibility and Highway Matters.....	25
Need for Sustainable Delivery	26
Climate Change	26
Ecology.....	27
Biodiversity Net Gain.....	27
CIL	28
5 Year Housing Land Supply	28
7. SUMMARY AND CONCLUSIONS.....	31
8. APPENDICES	34

Executive Summary

Consensus Planning Ltd have been instructed by MCH Minibuses to submit a planning and listed building application at 3 Fore Street, Trowbridge BA14 8HY, seeking consent for the;

- Conversion of the Existing Listed Building to 2No Two Bed Apartments, and
- Construction of a new 4 storey building at the rear for 4No 1 Bed apartments

This Planning statement forms part of the submission made by Consensus Planning Limited.

The building is collectively Grade II* listed (List Entry Number:1183060) and was first listed on 29 December 1950 and forms part of the wider Trowbridge Town Centre Conservation Area. The site is located within the town centre, in Wiltshire District Councils main settlement.

The first floor has remained vacant for many years (**see page 8-Photo 4 of the DAS**) with no physical connection or linkage with the Former bank at ground floor level in Class E. The proposals relate to the change of use and internal alterations to the Listed building with external alterations proposed both to the front elevation, but primarily to the rear elevation.

This application demonstrates that the proposal is acceptable in principle complying with the relevant Development Plan policies; and that the proposals will result in a number of positive changes to the surviving historic fabric of the Listed building and layout of the ground and first floors.

Furthermore, it is illustrated that there would be no adverse amenity impacts in terms of the prospective occupiers and neighbouring properties; and that the development is highly accessible and acceptable in highway terms. Instead there will be substantial benefits as a result of the proposed development.

It is concluded that the proposal represents sustainable development in line with the Development Plan; emerging policy; national guidance and other material considerations.

1. INTRODUCTION

- 1.1 This Planning Statement is submitted in support of the applications seeking full planning and listed building consent for the Conversion of 3 Fore Street, Trowbridge BA14 8HY, the existing Listed Building for 2No Two Bed Apartments and a new 4 storey building at the rear for 4No 1 Bed apartments.
- 1.2 This Statement sets out the main planning considerations and justifications for the scheme. In support of the application, this Statement demonstrates that the proposed scheme is acceptable in principle and expands upon issues relating to impact upon the historic environment (listed building and conservation area), residential amenity and accessibility.
- 1.3 The application submitted comprises the following plans and documents.
- Existing Floor Plans and elevations
 - Proposed Floor Plans and elevations
 - Site location, and sections
 - Design & Access Statement
 - Heritage statement
 - Ecology statement
- 1.4 This statement should be read in conjunction with the plans and documents that make up the application as a whole.
- 1.5 The applicant sought pre-application advice with Planning Officers and a detailed written response was received from the Council on **13th November 2025**.

2. SITE AND SURROUNDINGS

2.1 History of the Listed building

A full detailed history is available in the Heritage statement accompanying this application.

The Listed building is Grade II*, within a Conservation Area, and is located in a prominent position within Trowbridge town centre. Key information relevant to this application can be summarised as;

- Parts of the existing building date back to 1600
- In the early eighteenth century the building was thoroughly modernised. The works appear to have included new front and back walls and a much-altered interior.
- In 1843 No.3 Fore Street became a Bank, but not within the existing Listed building, instead it was located in a large building at the rear, accessed from the street via a passage through the eastern end of No.3 (which is what this application seeks to reopen)
- The Bank was taken over by Barclay's Bank in the 1920s who carried out a number of alterations, in 1923, and more specifically;
 - I. 1929 (Large bay window on the ground floor created),
 - II. 1953 (Conversion of the passage opening to a window) and
 - III. 1965 (which is when it is believed everything at the rear was demolished and replaced with the existing flat-roofed extension)
- The existing building was first Listed in 1950.
- The first-floor space (comprising first floor and attic) has not been used for many years and contains much evidence of relatively recent major repairs to the roof, including all new dormer windows and many replacement rafters.

- 2.2 The application site comprises the ground and first floors of number 3 Fore Street, Trowbridge. The site is within the urban area of Trowbridge forming part of the town centre and the Trowbridge Town Centre Conservation Area. The buildings are collectively Grade II* listed (list entry 1183060). The location of the site is shown below in the extract from the submitted plans.



- 2.3 Number 3 Fore Street is in Class E Use; formally the Barclays Bank at ground floor. The first floor was not in use. The building as a whole is currently vacant having formally closed as a Bank in September 2022.
- 2.4 The listed building can be seen in the photograph below, and on **page 8-Photo 1** of the Design & Access Statement.(DAS)



Existing Historical form

- The existing building is the eastern half of what was a single dwelling, the two parts (Nos.2 and 3) being Listed at Grade II* on account of their historic and architectural significance as a late-medieval or early post-medieval woolcloth merchant's house that was fashionably re-faced in the eighteenth century.
- The site forms part of a group of exceptional Georgian merchant's houses on Fore Street (many listed at Grade II* or Grade I) , those on the south side (including the Site) being built on an outer part of the site of Trowbridge's former medieval castle.

3. DEVELOPMENT PROPOSAL

- 3.1 The application seeks planning permission and listed building consent for the Conversion of No.3 Fore Street, Trowbridge from a former bank now lying vacant to 2(no.) apartments, to include a new 4-storey apartment block to the rear providing a further 4(no.) apartments. comprising a material change of use from Class E to Class C3.
- 3.2 The proposals will substantially restore the key front facade of the host building to its original eighteenth-century state, reflecting the previous similar treatment of 2 Fore Street. **Please see page 11 of the DAS which highlights the key changes.** This will include removing the bay window inserted in the early twentieth century, reflecting the later commercial rather than the historic residential use. It will also strip out the harmful, large flat-roof extensions (**see page 8-Photo 7 of the DAS**) wholly at odds with the asset's historic character and remodelling of the Site to convert it to a bank in the twentieth century.
- 3.3 The scheme will, therefore, reinstate the historic courtyard and arrangement of the rear elevation to the historic building. These enhancements can be regarded as a significant public benefit, as they will enhance the significance and the legibility of the asset's significance, as well as that of the wider group of important historic merchant's houses on Fore Street.
- 3.4 The proposed apartment block at the rear of the Site has historic precedent in a large building that is shown at the back of the plot on published maps prior to 1969. (see Heritage statement) It seems most likely that this was a clothier's warehouse before becoming a bank to the rear of the residence in the later nineteenth century. Further precedence, in terms of height and number of storeys of the proposed rear element, is given in immediately adjacent backland and rear elements, including to the rear service wing of number 2 Fore Street (part of the original historic building on the Site). Given these precedencies, coupled with the discreet location of the proposed new block (it will not be visible from Fore Street, see illustrated section at **page 12 of the DAS**), no notable harm is predicted to the host building's heritage significance.

3.5 Apart from a new external door at 1st floor in the rear elevation (in the existing opening) and replacement external stair access (replacing the existing steel structure) **(see page 8-Photo 3 of the DAS)** the proposals involve no change to the historic fabric of the first-floor rear elevation, subject to the conservation repair of the existing fenestration. The removal and replacement of the existing large rear, flat-roof, ground-floor extension, with the reinstatement of the historic rear courtyard and the revealing of the historic rear elevation (the central projecting barrel bay), is regarded as having a large positive effect on the heritage asset's significance and its legibility, and that too of the setting to adjacent built heritage assets. **(see page 11 of the DAS)**

3.6 The proposal is a car free development, encouraging a more sustainable form of development, and attracting occupiers that are not reliant on a private car for transport. This also ensures an efficient use of the site, and the long term viability of the Listed building by generating sufficient value to fund the refurbishment of the Listed building.

Nonetheless, Wiltshire Council operate a Resident parking permit system that issues to residents living within a resident parking zone, for at least four nights per week, the opportunity to apply for a parking permit for their own vehicle. Resident parking permits are vehicle registration number specific. This would facilitate occupiers of these dwellings that did have a car parking in close proximity of the site should they wish to do so.

3.7 Other heritage benefits and enhancements include; **(see page 11 of the DAS)**

- the reinstatement of the ground floor and the attendant step at the front door.
- the reinstatement of the historic side passage allowing rear access to the Site from Fore Street.
- no removal of significant historic fabric.
- The historic ceiling will be retained, albeit that it will be divided in places by new partitions.
- Bringing the first floor and attic space of the frontage range into a beneficial use (an optimum viable use) as an apartment is regarded as a significant benefit.
- retention and conservative repair of the windows.

- Improved relationship with neighbouring buildings, providing them with views into the reinstated courtyard, significantly improving the outlook from existing ground floor windows that only currently have sight of a lightwell. **(see page 8-Photo 6 of the DAS)**

3.9 Overall, the proposed development will deliver a number of significant public benefits that mitigate in its favour, including giving this neglected building a long-term sustainable use and providing six new town-centre residential dwellings.

3.11 Ground floor proposed residential use

The application proposes replacing the existing vacant building (formerly a Bank) with residential dwellings, this reinstates the Listed building to a 100% residential use in accordance with the use when it was first built as a single dwelling house.

Alternative commercial use

The alternative use would be retail or offices. Both these alternative commercial uses are in decline, with demand falling year on year. It would not be conducive to boosting the economic vitality of the town centre by proposing a commercial use for which there is very limited demand and already an over-supply. Furthermore, the government are encouraging greater residential development in town centres as part of the NPPF.

Retail Study

Wiltshire Council commissioned the 'Wiltshire Retail and Town Centres Study 2020' which was published in November 2020. The findings of this specifically regards Trowbridge town centre were as follows;

Paragraph 4.246

"The town centre's vacancy rate exceeds the national average and this has remained the position since the 2012 land use survey.

the persistent high level of vacancy in the centre could suggest that there is a surplus of retail floorspace in the town centre when compared with occupier demand."

Paragraph 4.263

“Trowbridge has been the main focus for town centre development projects over the past several years and it is now likely, in our opinion, that the centre has reached its peak potential in terms of retail and leisure floorspace.”

“The focus should now be diversifying under-used and vacant space, not least as the proportion of vacant units in the centre has remained well above the national average over the past several years.”

“the focus for the next stage of regenerating the town centre will be diversification.”

This planning application is consistent with the conclusions of this Retail Study, enabling the diversification from a former Bank to a residential use to ensure the long term viable use of this Listed building.

3.12 Summary of the proposal and Heritage benefits

Existing Listed Building

- Under the proposals, the present flat-roofed ground-floor extension at the rear (dated to between 1936 and 1969, probably 1965) which is detrimental to the Listed building is to be demolished and will enable the reinstatement of the historic courtyard and the projecting central semi-circular bay window currently concealed from view.
- The proposed alterations to the front (Fore Street) elevation comprise the removal of the present ground-floor bay window and its replacement by two individual windows matching those on the upper storey, together with the removal of the inserted ground-floor window at the eastern end of the ground floor and the reinstatement of the historic doorway/ alleyway. (see page 19 of the DAS)
- These changes, will restore the frontage to its eighteenth-century form, that was maintained until around the 1920s. The restoration of the exterior is regarded as a

heritage public benefit as it will enhance the appreciation of the host building, as well as that of the wider group of important historic merchant's houses along Fore Street.

- The works involve the removal of the 1960s bay window (as well as its 1920s opening), the removal of a very recent modern window at the eastern end (inserted following the removal of an ATM) and the replacement of the existing front doors (probably dating to the 1920s). The proposals retain the first-floor and attic windows (early nineteenth-century and modern respectively), and the Georgian railings and the ornate cast iron panelled standards with lamp overthrow.
- The proposed doorway to the reinstated passage as shown on the 'as proposed' plans is significantly narrower than that shown in historic imagery. As this opening was originally a passage accessing the warehouse and early bank at the back of the building, but will now only serve residential dwellings.
- The replacement of the existing large flat roof extension is regarded as having a major benefit to the host building's artistic significance. (see p.8-Photo 7 of DAS)
- Importantly the historic courtyard space will be reinstated, thereby revealing the central projecting bay as part of the historic rear elevation to the historic building.
- Bringing the first and second floors of the frontage into a beneficial use as an apartment is regarded as a significant benefit.
- This proposed apartment is currently a single space due to previous removal of all partitions and attic floor, probably when the roof was subject to past extensive repair. Given the existing state of these upper floors, the proposed partitions are not seen as unduly harmful, particularly as the proposed subdivision of the space retains a double-height space. (see page 8-Photo 8 of the DAS)

New building at rear

- The proposed apartment block at the rear of the Site has historic precedent in a large building that is shown at the back of the plot on published maps prior to 1969. It seems most likely that this was a clothier's warehouse before becoming part of the Savings Bank. Given this precedent, coupled with the discreet location

of the proposed new block, no harm is predicted to the host building's heritage significance.

- The proposed four-storey block will have very limited views of it from the Trowbridge Town Centre Conservation Area, particularly the 'Historic Retail Centre Character Area'. It is clear that the proposed four-storey block is invisible at ground-level from the public realm of Fore Street. **(see page 12 of the DAS)** If any part of the proposed new block is visible (e.g. from the upper windows of the surviving woollen mills within the Character Area), there is no reason why a new red-brick building under a traditional gabled slate roof should have an adverse effect on the character or appearance of the conservation area.

4 PLANNING HISTORY

- 4.1 A review of the Councils online planning register has revealed a number of planning applications which are of relevance. These applications are listed in the table below.

Application Number	Description of Development	Decision and Date
PL/2022/05635	Planning application: External alterations including removal of existing ATM and reinstate existing window, remove branch ... (Site: 3 Fore Street, Trowbridge, BA14 8HY	Permitted 29/09/2022
W/12/00471/ADV	1 x new non-illuminated heritage individual letters sign and 1 x non-illuminated heritage hanging sign	Permitted 30/04/2012
W/10/02599/FUL	Installation of steps to a flat roof to replace an existing vertical ladder and installation of walkway across the flat roof to neighbours escape ladder	Permitted 13/10/2010
W/00/01272/LBC	Signage	Permitted 12/07/2001
W/94/00595/LBC	Resiting 20th century partition and coving with provision of new coving and skirting	Permitted 11/07/1994
W/86/01223/LBC	Installation of an NCR type Barclaybank cash dispenser	Permitted 12/11/1986

- 4.2 As can be seen from the planning history previous applications have generally related to the commercial uses on the ground floor with an emphasis on signage and minor repair works.

5 PLANNING POLICY CONTEXT

- 5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that planning decisions should be made in accordance with the Development Plan unless material considerations indicate otherwise. The starting point for the determination of this application is therefore the current development plan for the District which is the adopted Wiltshire Core Strategy 2015.

The main issues against which the application would be assessed are:

- Principle of the Development
- Impact upon Heritage Assets
- Residential Amenity
- Climate Change
- Ecology
- Biodiversity Net Gain
- Highway Safety
- CIL

The Development Plan

The Development Plan policy context for the site and the surrounding area is provided by the adopted Wiltshire Core Strategy 2015 (the Local Plan). Although there are further adopted documents, none are relevant to this application.

- 5.2 The policies that are of relevance to this application are:

- Core Policy 1 Settlement Strategy;
- Core Policy 2 Delivery Strategy;
- Core Policy 3 Infrastructure Requirements;
- Core Policy 29 Spatial Strategy: Trowbridge Community Area
- Core Policy 41 Sustainable Construction and Low-Carbon Energy;
- Core Policy 45 Meeting Wiltshire's Housing Needs;

- Core Policy 50 Biodiversity and Geodiversity;
- Core Policy 55 Air Quality;
- Core Policy 56 Contaminated Land;
- Core Policy 57 Ensuring High Quality Design and Place Shaping;
- Core Policy 58 Ensuring the Conservation of the Historic Environment;
- Core Policy 60 Sustainable Transport;
- Core Policy 61 Transport & Development;
- Core Policy 62 Development Impacts on the Transport Network;
- Core Policy 64 Demand Management
- Core Policy 67 Flood Risk;
- Core Policy 68 Water Resources;
- West Wiltshire Local Plan – First Alteration Saved policy SP1 – Town Centre Shopping
- Supplementary Planning Document: Wiltshire Design Guide 2024 Trowbridge and Westbury Bat Mitigation Strategy National:
- National Planning Policy Framework (NPPF)

National Planning Policy Framework

5.3 The Council must also have regard to other material considerations when reaching its decision. In particular, it is necessary to have regard to guidance and policies in the National Planning Policy Framework (NPPF) which was revised on December 2024. The Framework sets out the Government’s economic, environmental and social planning policies for England and details how these are expected to be applied. It is, in itself, a material consideration in planning decisions.

5.4 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. So that sustainable development is pursued in a positive way, at the heart of the NPPF is a presumption in favour of sustainable development. This means

“approving development proposals that accord with an up-to-date Development Plan without delay” or “where there are no relevant Development Plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:

- i) the application of policies in this Framework that protect areas or assets of particular importance provides a **strong** reason for refusing the development proposed; or*
- ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination*

5.5 The NPPF defines the three overarching objectives of sustainable development as:

An Economic Objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

A Social Objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being;

An Environmental Objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

5.6 These objectives should be delivered through the preparation and implementation of

plans and the application of policies in the NPPF; they are not criteria against which every decision can or should be judged. Planning decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

- 5.7 Paragraph 231 of the NPPF advises that the policies within the NPPF are material considerations which should be taken into account in dealing with applications from the day of its publication.
- 5.8 Paragraph 232 of the NPPF advises that existing policies should not be considered out-of-date simply because they were adopted or made prior to publication. Due weight should be given to them, according to their degree of consistency with the NPPF and that the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given.
- 5.9 Section 12 of the NPPF provides context to design within planning. Paragraph 131 states *“The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”*
- 5.10 Paragraph 90(f) says that Planning Policies should recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.
- 5.11 Paragraph 125{c} states *“Planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused.”* The applicant demonstrates within this statement that substantial harm does not result and therefore the proposal should be permitted.
- 5.12 Paragraph 109 says that transport issues should be considered from the earliest stages of plan-making and development proposals, so that opportunities to promote walking, cycling and public transport use are identified and pursued; and the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into

account – including appropriate opportunities for avoiding and mitigating any adverse effects.

- 5.13 Section 16 of the NPPF relates to the historic environment and directs that in considering applications concerning designated heritage assets *“great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be)...”* (Paragraph 212). It also requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. 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. (Paragraph 200)

Appropriate Weight

- 5.14 Regarding the weight that is given, Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, determination of applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise. In this instance, full weight is attributable to the Wiltshire District Local Plan 2011-2031 (the Local Plan) as it forms part of the Development Plan.
- 5.15 As it forms the basis of Government policy for planning applications, substantial weight should be given to the policies of the NPPF.

6 PLANNING CONSIDERATIONS

Overview

This application proposes demolition of the unsympathetic flat roof 1960's extension, and the reintroduction of a inner rear courtyard that will serve to reinstate the form of the original Listed building, with corresponding significant positive heritage benefits

The new 4 storey building at the rear will enable the financing of the refurbishment works to the Listed building, enabling the proposal to be commercially viable.

- 6.1 Having regard for the proposed development; the sites planning history; the relevant planning policy context; and all other material issues; the main planning considerations for the determination of this application relate to impact upon the historic environment (listed building and conservation area), residential amenity and accessibility.

Principle of Development

- 6.2 The main policy considerations relating to the principle of development are set out by Wiltshire Core Strategy (**WCS**) Policies CP1 (Settlement Strategy) and CP2 (Delivery Strategy) set out the spatial strategy for sustainable development across Wiltshire. These policies direct new development to the most sustainable locations, primarily within the limits of development of market towns. Saved policy SP1 states that proposals should not harm the vitality and viability of the town centre. This site is not located within a primary retail frontage, therefore preserving a retail use in this location is not a priority. Residential uses can form part of the town centre providing the essential function of the town centre is not compromised
- 6.3 CP1 identifies Trowbridge as a Principal Settlement which is described as a socially and economically sustainable area including accessibility to services and facilities in which there is a presumption in favour of sustainable development.
- 6.4 The provision of residential development is considered acceptable in principle, Officers confirmed in a formal pre-application enquiry 13th November 2025 that there is no objection to the conversion of these areas into residential use.

Impact upon the Historic Environment

- 6.5 Policy CP57 of the WCS seeks to ensure that all development proposals are of a high standard of design that responds positively to the local context and contributes to a sense of place. This includes consideration of layout, form, materials, scale, and relationship to the surroundings
- 6.6 Policy CP58 Para 6.138 says “Designation of a conservation area, listed building, or scheduled ancient monument does not preclude the possibility of new development and the council is committed to working pragmatically with owners to find positive solutions which will allow adaptation of such buildings to reflect modern living aspirations”
- 6.7 The conversion would secure the future of the heritage asset, conserve its significance, ensure the building remained structurally sound, and enable a long term viable use of the building, the benefits of which are detailed in the Built Heritage Statement by Blake Turnbull accompanying this application..
- 6.8 The proposals addressed by the Built Heritage Statement submitted with this application, highlight significant improvements to the former Bank’s external fabric and will thus have a positive impact on the character and appearance of the Trowbridge Town Centre Conservation Area and a neutral impact on the settings of any other nearby built heritage assets.
- 6.9 The principal heritage interest of the Site undoubtedly derives principally from the former Bank’s external appearance, despite significant modern interventions. The upper floor has never been accessible by the public and remained vacant for decades.
- 6.10 On balance, the impact of the proposals on the host building’s architectural and historic interest is assessed as positive, with any slight harms being offset by the public benefits of giving the asset an optimum viable new use that will sustain it into the future and the creation of 6 new dwellings located in a sustainable town-centre location.
- 6.11 In view of the above, it is demonstrated that the proposed conversion works would result in no harm to the host listed building’s heritage significance and the development would therefore comply with the policies set out within the Development Plan.

Impact Upon Heritage Assets

- 6.12 Policy CP58 of the WCS requires development to protect, conserve and, where possible, enhance the historic environment, including the character and setting of heritage assets. This reflects the approach in Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and paragraphs 212–221 of the NPPF. Where harm to a heritage asset is identified, there must be clear and convincing justification.
- 6.13 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.
- 6.14 Core Policy 58: Ensuring the conservation of the historic environment Para 6.137 says *“Within the context of the specific characteristics of Wiltshire, development will be required to be sensitive to all heritage assets including:*
- the sensitive re-use of redundant and under-used historic buildings and areas which are consistent with their conservation especially in relation to the viable re use of heritage assets at risk”*
- 6.15 The proposals will substantially restore the key front facade of the existing building to its original eighteenth-century state, reflecting the previous similar treatment of No.2 Fore Street. This change is regarded as a significant public benefit, as it will enhance the appreciation of the host building, as well as that of the wider group of important historic merchant’s houses on Fore Street.
- The proposed apartment block at the rear of the Site has historic precedent in a large building that is shown at the back of the plot on published maps prior to 1969. It seems most likely that this was a clothier’s warehouse before becoming part of the Savings Bank. Given this precedent, coupled with the discreet location of the proposed new block, no harm from the proposed new block is predicted to the host building’s heritage significance.
 - Apart from a new external door (in the existing opening) and replacement external stair access (replacing the existing steel structure) the proposals involve no change to the

historic fabric of the rear elevation at 1st floor level, subject to the conservative repair of the existing fenestration.

- The demolition of the existing large flat roof extension is regarded as having a large positive effect on the host building's artistic (aesthetic) significance.
- The ground-floor two-bed apartment will not involve removal of significant historic fabric. The reinstatement of the historic ground-floor central rear projecting bay, with the reinstatement of the rear courtyard, will deliver a significant heritage enhancement (public benefit).
- Bringing the first floor into a beneficial use as an apartment is regarded as a significant benefit. Subject to the retention and conservative repair of the windows, the only removal of historic fabric will be the removal of the suspected chimney breast and fire surround on the first floor. The removal of the modern false floor is seen as a significant benefit.
- Given the existing state of the upper floor, the proposed partitions are not seen as unduly harmful, particularly as the proposed subdivision of the space retains a double-height space.

6.16 3 Fore Street is a Grade II* Listed Building. The Local Planning Authority is therefore statutorily required to have special regard to the desirability of preserving the building, its setting, and any features of special architectural or historic interest it may possess, in accordance with Sections 16(2) and 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990.

In view of the above, it is demonstrated that the proposed conversion works would result in no harm to the host building's heritage significance and historic internal layout on these floors of the listed building, however in reference to the latest publication of the NPPF (December 2024) paragraph 125 (c) makes clear that;

*Para 125. Planning policies and decisions should; (c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless **substantial harm** would be caused."*

Clearly the Heritage statement confirms no harm from the proposed new block is predicted to the host building's heritage significance and so 'substantial harm' would not be caused, and thus the NPPF makes clear this brownfield site should be approved for homes, and would therefore comply with national policy, which takes precedent over the policies set out within the Development Plan.

- 6.17 The site also lies within the Trowbridge Town Centre Conservation Area, wherein the Local Planning Authority is statutorily obliged to pay special attention to the desirability of preserving or enhancing the character or appearance of the area, in accordance with Section 72(1) of the above Act.
- 6.18 Section 16 of the National Planning Policy Framework (NPPF) requires that Local Planning Authorities should take account of the desirability of sustaining or enhancing the significance of heritage assets.
- 6.19 Paragraph 205 states that when considering the impact of the proposed works on the significance of a designated heritage asset, great weight should be given to the asset's conservation.
- 6.20 Paragraph 206 states that any harm to, or loss of, the significance (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 6.21 Paragraph 208 states that where a development proposal will lead to less than substantial harm to a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 6.22 Currently the space is vacant, therefore, providing the building with a viable use will ensure its continued maintenance, which represents a positive impact.
- 6.23 The NPPF states that harm should be weighed against benefits, including securing the optimum viable use for the building. Residential use is the optimum viable use, and this can be achieved with comparatively few interventions. However, a statement of intent for all historical features has been submitted (see Heritage Statement) demonstrating the works proposed will result in a viable use for the space, therefore resulting in a positive

impact to the significance of the listed building.

- 6.24 The proposals will not harm the significance of the grade II* listed building, but enhance it together with preserving the setting of the Trowbridge Town Centre Conservation Area. As such full consideration has been given to Sections 66(1) and 72(1) of the Planning (Listed Buildings & Conservation Areas) Act, 1990.

Historic England Pre App Advice

- 6.25 A meeting was held on site **6 November 2025** between the Heritage consultant for the Applicant (Blake Turnbull Heritage Consultancy) and Historic England, the latter subsequently confirming in a formal letter dated **13 November 2025** that;

- *“subject to further detailed plans, Historic England are broadly supportive of the aims of the scheme that will reinforce the building’s significance as a former house and enhance its contribution to the conservation area.”*
- *“the principle of returning the building to residential use, albeit as two apartments rather than a single dwelling, has the potential to enhance the significance of the building, and restore its aesthetic and historic qualities”*

- 6.26 Historic England summarised the history of the site with the following notes;

- 2 and 3 Fore Street was built as a single-pile house in the post-medieval, possibly medieval period, and retains a significant proportion of its original roof structure.
- The building was re-fronted in the early 18th century, retaining the side passage to the left.
- The house appears to have been subdivided into two separate units in the mid-19th century with evidence that 3 Fore Street became a bank, and 2 Fore Street became a

commercial premises with an inserted shop front.

- The façade of No 2 was restored in the early 1970s with the reinstatement of two ground-floor sash windows, and also the insertion of a segmental pedimented doorway.
- The façade of 3 Fore Street, which was altered to include a large plate glass display window in around 1920, retains a late 20th century multi-pane bow window. The ground-floor sash windows have been removed, and the side passage is now blocked.

6.27 Historic England then summarised the Heritage benefits of the proposal as;

- *"A significant aspect of the scheme is the reinstatement and repair of the historic building, in particular the 18th century façade to include the reopening of the side passage."*
- *"reinstating the historic footprint of the building, and the restoration of the 18th century bay window to the rear."*
- *"The reinstatement of the two ground-floor sash windows with associated stone architrave and the re-opening the side passage to provide access to the rear courtyard will reinforce the historic value of the building"*
- *"We support the removal of all of the 20th century flat-roofed additions to the rear of the site which will restore the historic courtyard and improve the aesthetic quality of the building's south elevation."*
- *"The proposed scheme includes a four-storey detached building to the south side of the*

courtyard. There is precedent for a building in this location, accessed via a side passage from Fore Street, and there are buildings to the rear of the neighbouring buildings of four storeys. Historic England would have no objection in principle to a four-storey building in this location subject to further detail in terms of its form, materials, architectural detailing, and relationship to the neighbouring buildings."

As a consequence the proposals have been further developed retaining these principles but providing the additional detail Historic England requested.

Impact upon Residential Amenity

- 6.28 It is important to consider the impacts upon both a) the neighbouring properties; and b) the prospective occupiers. Policy CP57 includes a requirement that development should ensure a high standard of amenity for existing and future occupants (point vii). This includes safeguarding privacy, outlook, natural light, and protection from noise, disturbance, and overbearing effects.
- 6.29 The external alterations provide a positive impact upon neighbouring properties (commercial and residential). Equally, it is unlikely that any adverse impacts would arise from domestic noise or other variables and it is therefore considered that the impact upon surrounding neighbours would be negligible to beneficial given the improved outlook into the reinstated courtyard. (see page 8-Photo 6 of the DAS)

The reinstatement and introduction of the rear courtyard will provide external space for the residential dwellings. In addition the mature tree at the rear of the site will be retained providing a further additional courtyard accessible by the ground floor flat, and providing a pleasant outlook for the 3 flats on the upper floors. There are several public parks and gardens in close proximity for prospective residents to utilise should they wish including Trowbridge Park (7 minute walk); Langford Park (15 minute walk); Biss Meadows Country Park (18 minute walk).

- 6.30 As set out above, the proposed development would have an acceptable impact upon

residential amenity in accordance with the Development Plan..

- 6.31 The works proposed and the use will not detrimentally impinge on the residential amenities of the area in regards loss of privacy, or loss of light, overbearing or overshadowing impacts, noise, pollution (including light), odours or vibration.
- 6.32 The scheme is compliant with policy.

Accessibility and Highway Matters

- 6.33 Trowbridge is a Principal Settlement within Wiltshire comprising a socially and economically sustainable area including good accessibility to services and facilities.
- 6.34 Policies CP60 to CP64 set the transport and accessibility framework for development in Wiltshire. Proposals must provide safe and suitable access for all users and should not have a severe impact on the transport network. Adequate parking, turning space, cycle storage, and accessibility for waste collection should be incorporated in line with Wiltshire's adopted car parking strategy.

Opportunities to promote walking, cycling and public transport use should be prioritized. Proposing new residential development in this town centre location meets with these objectives.

- 6.35 The proposal is for a car free development given the town centre location and the fact that no on-site parking is possible. The pre-application advice from the Council is that this would be acceptable as this is within a town centre, with shops, supermarkets, bus routes and the train station within walking distance.. Equally there are a number of public parking facilities in close proximity, briefly comprising the The Shires Car Park, Church Street Car Park, Broad Street Car Park and Trowbridge Railway Car Park.
- 6.36 The provision of residential units generates a materially different level of type of traffic than the previous Bank (Class E) use, likely to lead to a reduction of vehicle movements.
- 6.37 Indeed, the lack of parking provision should be applauded for
 - a) promoting the use of sustainable transport and lowering the environmental impacts of

traffic;

b) seeking to provide housing for those working within the immediate area; and

c) reducing congestion within Trowbridge Town Centre.

6.38 Paragraph 109 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

6.39 The sustainable location of the site close to existing bus stops and public car parks is noted and therefore the development would not result in an unacceptable impact on highway safety or the local road network. The scheme is compliant with policy.

Need for Sustainable Development

6.40 The Framework provides a presumption in favour of sustainable development. It recognises that in order to achieve sustainable development gains should be sought in environmental; economic and social aspects.

6.41 In environmental terms the development will have a positive impact to the environment by providing centrally located residential accommodation designed in the spirit of the 10 minute town with a great reliance upon pedestrian and public transport means.

6.42 The economic benefits of providing housing are clear. The development would provide work for local contractors and market housing would generate tax revenue, improving public services within the area contributing to safer and healthier communities.

6.43 The social benefits are found within the location of the site which is within to the town centre employment area so would provide a desirable place to live for local people and re-utilising underused space.

Climate Change

6.44 Local Plan Policy CP57 requires development to accord with the Wiltshire Design Guide 2024. Paragraphs provide guidance regarding sustainable design and states that 'the

potential impacts of climate change can be addressed through a variety of means, from the incorporation of better insulation and renewable energy technologies, to adaptations for severe weather events, and the use of local and recycled building materials. Re-use of existing buildings is also often more environmentally sustainable than demolition and new build.' The Design Code also stresses that sustainable design needs to be responsive to the character of the area and the sensitivities of the site.

- 6.45 However, given the need to respect the listed status of the building, and the restrictions this implies, together with the fact that the existing building occupies 90% of the site, with the remaining 10% hardstandings, there is no existing green amenity space. The existing mature tree will be retained, and new planting boxes will be introduced to the new courtyard..

Ecology

- 6.46 See the Ecology statement undertaken by Origin Environmental Arboriculture Ltd submitted with this application.

In section 15 of the NPPF, the importance of "minimising impacts on biodiversity and providing net gains..." is highlighted as is the need to refuse applications that result in "significant harm". It also requires that Local Planning Authorities (LPA) encourage "opportunities to incorporate biodiversity improvements in and around developments".

- 6.47 Policy CP50 seeks to conserve and enhance biodiversity across Wiltshire. Development should avoid harm to protected species and habitats and provide net gains in biodiversity wherever possible. Origin Ecology has been appointed to carry out a Preliminary Ecological Appraisal (PEA). This has found no evidence of protected species. The report is attached to the application.

Biodiversity Net Gain

- 6.48 Biodiversity net gain (BNG) is a new approach to development which means that habitats for wildlife must be left in a measurably better state than they were before the development occurred. Under the Environment Act 2021, there is a desire for applicants

to deliver at least a 10% net gain. There are, however, exemptions.

- 6.49 A biodiversity net gain statement has been submitted with the planning application. (See the Ecology statement undertaken by Origin Environmental Arboriculture Ltd) The biodiversity net gain statement establishes that the proposal, if granted, would not be subject to a general biodiversity gain condition, i.e., must deliver at least 10% BNG due to the limitations of the Listed building status, and lack of any green space. The proposal is therefore exempt, and the application is not required to demonstrate a measurable net gain. However, it is proposed to introduce ecological enhancements, such as the integration of bird and bat boxes.

Community Infrastructure Levy (CIL)

- 6.50 The proposed development would be liable for CIL as set out in the Wiltshire CIL Charging Schedule dated May 2015. This is a charge that local authorities can impose on new developments in their area. The money generated through the levy will contribute towards the funding of infrastructure to support growth and is payable upon commencement of development.

5 Year Housing Land Supply

- 6.51 The update to the NPPF in December 2024 confirms that the Council needs to provide a five year Housing Land Supply (HLS). As a result of recent changes to the way housing need is calculated, introduced by government, the Council is unable to demonstrate a five-year supply of deliverable housing sites. Currently the Council can show a **2.42 year supply**.

- 6.52 **3 year housing delivery test** (Data December 2023/ Published December 2024)

The latest Housing Delivery Test results (published by Government) is for the 3 year period ending 31/12/2023 indicating that Wiltshire achieved 135% delivery against the housing requirement in the Housing Delivery Test. This result indicates that no buffer should be added to the housing requirement in the 5-year housing land supply calculation, but this is

now 2 years out of date. This uses a housing requirement of 5358 dwellings for the 3 year period ending 31/12/2023 (Average of 1786 dwellings required annually) and confirms 7237 dwellings were completed in this period.(7237/5358=135%)

National Government targets (Published July 2024)

- 6.53 The Labour Government published in July 2024 their expectations for all Councils in England. For Wiltshire this confirmed a annual requirement of 1917 dwellings, but an annual increase of 2380 dwellings, taking the new annual requirement to 3476 dwellings annually.

Wiltshire Council Annual Housing Land Supply Statement (Data April 2024/ Published June 2025)

- 6.54 Wiltshire Council published in June 2025 their Housing Land Supply Statement using a base date of 1 April 2024. So by definition was 14 months out of date at publication and is now 20 months out of date at the date of this planning application. Nonetheless, it is the most up-to-date information available, and 6 months more up-to-date than the 3 year housing delivery test.

Area	Annual Local Housing Need (LHN)	5-year housing requirement	5-year housing requirement plus buffer*	Deliverable supply 2024-2029	Number of years deliverable supply
Wiltshire	3,525	17,625	18,506	8,945	2.42

It covers the housing land supply for the Wiltshire unitary authority area and each Housing Market Area (HMA) within Wiltshire as set out in the Wiltshire Core Strategy (adopted January 2015). It represents a snapshot at the date of publication and is produced annually as required by the National Planning Policy Framework (NPPF).

This statement confirms that the annual current Local Housing Need figure is 3525

dwelling per annum almost double the previous annual average used by Wiltshire Council of 1786 dwellings in their most recent 3 year housing delivery test. On this basis the Council would clearly be failing their 3 year housing delivery and a buffer would be applicable. The resultant 5-year housing requirement plus buffer to take account of previous years under supply is 18,506 dwellings. (Average of 3701 dwellings required annually) And based on the available land identified by Wiltshire Council equating to 8945 dwellings (1789 annually) over the 5 year period to 2029 are only able to demonstrate a 2.42 year housing land supply as at 1 April 2024. $[8945 / (18506 / 5) = 2.42]$

- 6.55 In conclusion the LPA cannot demonstrate a 5YHLS with less than half the required provision at 2.42 years. Consequently there is strong justification for this proposal for additional residential dwellings.

The NPPF is clear at Paragraph 11(d) of the NPPF “*where the policies which are most important for determining the application are out of date (ie; the LPA cannot demonstrate 5YHLS) granting permission unless*

- (i) *the application of policies in this framework that protect areas of assets of particular importance (ie listed buildings) provides a strong reason for refusing the development proposed*
- (ii) *any adverse impact of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this framework taken as a whole, having particular regard for key policies for directing development to sustainable locations and making effective use of land,”*

Therefore, in reference to 11d (i) which require strong reason for refusing, this is clearly not the case as there is general support from Wiltshire DC for the application and the level of harm to the listed building in the opinion of RPS is ‘no harm within the spectrum’

Furthermore, as confirmed elsewhere in this statement the site is in a highly sustainable location in the Town Centre where upon development should be directed as the NPPF supports.

7 SUMMARY AND CONCLUSIONS

7.1 The application seeks planning and listed building consent for the Conversion of the existing Listed Building for 2No Two Bed Apartments and 4No 1 Bed apartments in a new 4 storey building at the rear, at 3 Fore Street, Trowbridge BA14 8HY.

7.2 It is demonstrated that the proposed conversion works would result in no harm predicted to the host building's heritage significance or the building's historic internal layout, and in reference to the latest publication of the NPPF (December 2024) paragraph 125 (c) makes clear that;

*Para 125. Planning policies and decisions should; (c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless **substantial harm** would be caused."*

7.3 Clearly the Heritage statement confirms no harm and so 'substantial harm' would not be caused, and thus the NPPF makes clear this brownfield site should be approved for homes, and would therefore comply with national policy, which takes precedent over the policies set out within the Development Plan.

7.4 Instead, the proposed development will deliver a number of significant public benefits (heritage enhancements) that mitigate in its favour, including giving this neglected building a long-term sustainable use (an optimum viable use) and providing six new town-centre dwellings. These benefits need to be weighed against any minor harms, most of which may be mitigated, to a degree, through a programme of dendro-dating and archaeological building recording.

Key Benefits:

- Reinstatement of the original ground floor and the step at the front door.
- Removal of the 1960s bay window to the front elevation (as well as its 1920s opening), and reinstatement of the two ground-floor sash windows with associated stone architrave.

- Removal of a very recent modern window at the eastern end (inserted following the removal of an ATM) and the replacement of the existing front doors (probably dating to the 1920s).
- Retaining the first-floor and attic windows (early nineteenth-century and modern respectively),
- Retaining the Georgian railings and the ornate cast iron panelled standards with lamp overthrow.
- no removal of significant historic fabric.
- The historic ceiling will be retained, albeit that it will be divided in places by new partitions.
- Bringing the first floor and attic space of the frontage range into a beneficial use (an optimum viable use) as an apartment is regarded as a significant benefit.
- Retention and conservative repair of the windows.
- This proposed 1st floor apartment is currently a single space due to previous removal of all partitions and attic floor, probably when the roof was subject to past extensive repair. Given the existing state of these upper floors, the proposed partitions are not seen as unduly harmful, particularly as the proposed subdivision of the space retains a double-height space.
- Reinstatement and repair of the historic building, in particular the 18th century façade to include the reopening of the side passage to provide access to the rear courtyard
- Reinstating the historic footprint of the building, and the restoration of the 18th century semi-circular bay window to the rear.
- Removal of all of the 20th century flat-roofed additions to the rear of the site which will restore the historic courtyard and improve the aesthetic quality of the building's south elevation.
- 6 new residential dwellings in a town centre location to contribute towards the Council's housing shortfall

- Ensuring the long term viable re-use of a Grade II* Listed building and its long term maintenance.

7.5 Furthermore, it is shown that there would be no adverse amenity impacts in terms of the prospective occupiers, and neighbouring properties; and that the development is consistent with accessibility and highways.

7.6 This Statement has reviewed the relevant Development Plan Policy Framework as it applies in this case, together with the other material considerations. On the evidence presented it has been demonstrated that the proposal accords with all relevant Development Plan policies and national guidance, and there are no other material considerations present to override them.

8 APPENDICES

Appendix 1 – Design & Access Statement

Appendix 2 – Heritage Statement

Appendix 3 – Preliminary Ecological Assessment

Appendix 4 – Drawings

- 3903 200 A – Location Plan
- 3903 201 D – Proposed Site Plan
- 3903 202 – Existing Plans
- 3903 203 C – Proposed Plans 1/2
- 3903 204 D – Proposed Plans 2/2
- 3903 205 C – Proposed Elevations
- 3903 206 B – Proposed Sections
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Appendix 5 – Application Form

Appendix 6 – CIL Form