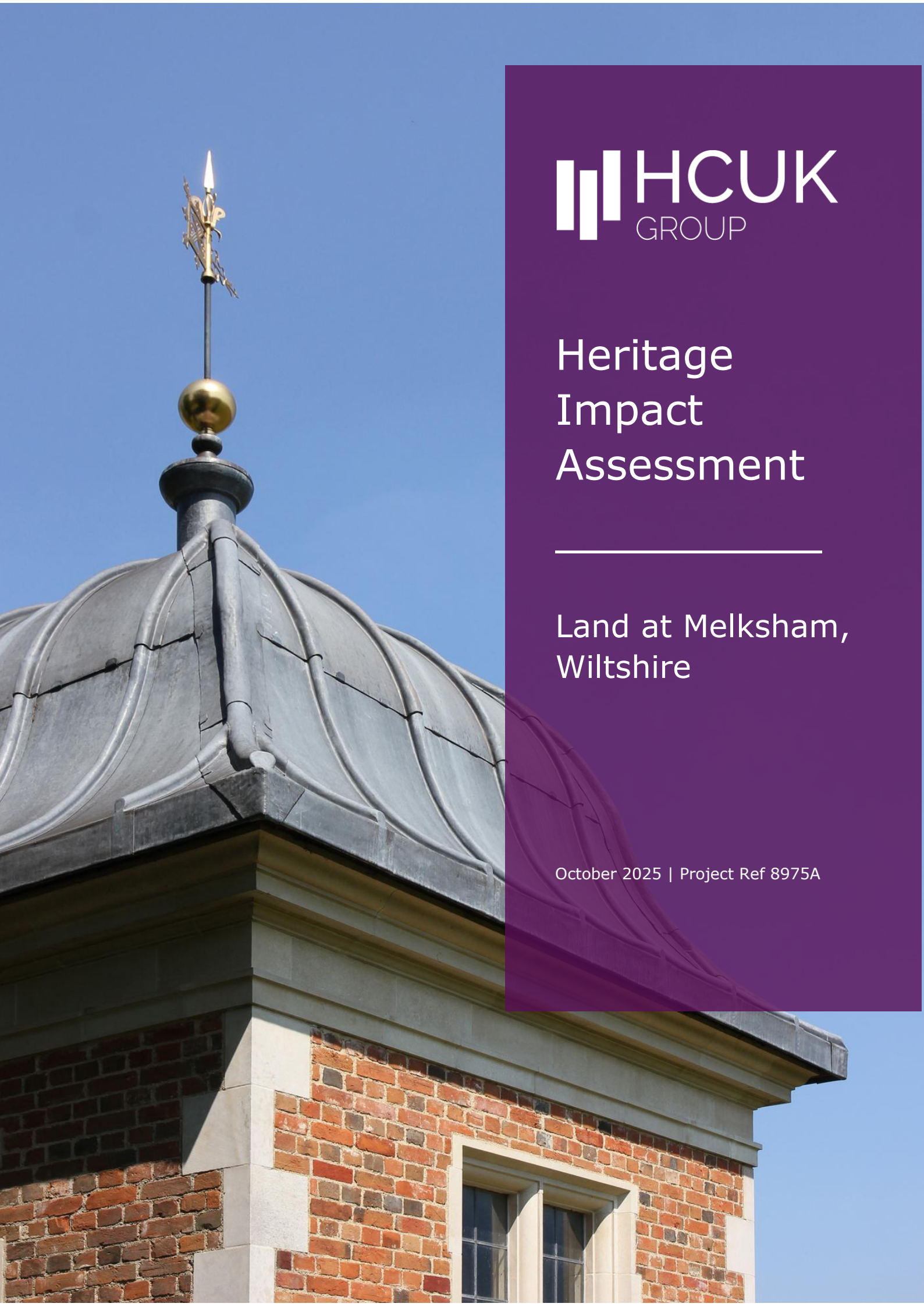




Heritage Impact Assessment

Land at Melksham,
Wiltshire

October 2025 | Project Ref 8975A





RTPI
Chartered Town Planners



Project Number: 8975A

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Contents

1. Introduction	4
2. Relevant Planning Policy Framework.....	6
3. Statement of Significance.....	9
4. Heritage Impact Assessment.....	13
5. Conclusions	15

Appendices

- App. 1 Scale of Harm table (HCUK, 2019)**
- App. 2 GPA3 Assessment: Historic England's Guidance on Setting**

1. Introduction

1.1 This Heritage Impact Assessment has been prepared by HCUK Group on behalf of Bloor Homes South West Ltd to inform and accompany an outline planning application for residential development on land at New Road Farm, Melksham. The illustrative masterplan is shown below at Figure 1.

1.2 The application comprises residential development; public open space including formal play space and allotments; sustainable drainage systems and associated infrastructure; a 100 place nursery and access points for pedestrians and cyclists. All matters are reserved except for access, the principal point of access is to be provided from a new northern arm onto an improved arrangement of the Eastern Way/A3102 roundabout junction and an emergency access onto the A3102.



Figure 1: Illustrative Masterplan

- 1.3** The site area measures approximately 14.95 hectares, and it is located approximately 2.5km to the north east of Melksham town centre.

Context

- 1.4** An initial assessment including background research and site visit was undertaken by HCUK Group in April 2023 in order to inform the proposals.
- 1.5** There are no listed buildings on the site, and it lies outside of the Conservation Area. The nearest Conservation Area is approximately 960m to the west (within the town centre area of Melksham).
- 1.6** There are four Grade II listed buildings in close proximity to the site, two of which are 360m to the west within the town centre area, Blackmore House is approximately 300m to the east, and Woodrow House Farmhouse and its railings is approximately 710m to the north.
- 1.7** As set out in the LPA's Screening Opinion, due to the distance between the site and the Listed Buildings it is unlikely that any proposal would give rise to significant environmental effects.

Purpose of this Statement

- 1.8** The purpose of this Heritage Impact Assessment is to assist with the determination of the applications by informing the decision makers on the effects of the proposed development on the historic built environment.
- 1.9** The heritage assets susceptible to impact have been observed and assessed by the author following a site visit in good weather in April 2023.
- 1.10** Value judgements on the significance of the heritage assets affected are presented and the effects of the proposals upon that significance are appraised. The report sets out how the proposal complies with the guidance and policy of the NPPF and local planning policy.

2. Relevant Planning Policy Framework

- 2.1** The decision maker is required by section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.¹
- 2.2** Measures being implemented as a consequence of the Levelling Up and Regeneration Act 2024 will have the effect of making the desirability of preserving or enhancing other types of designated heritage asset a statutory consideration.
- 2.3** The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows:
- 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.*
- 2.4** Historic England has produced guidance on development affecting the setting of heritage assets in The Setting of Heritage Assets (second edition, December 2017), better known as GPA3. The guidance encourages the use of a stepped approach to the assessment of effects on setting and significance, namely (1) the identification of the relevant assets, (2) a statement explaining the significance of those assets, and the contribution made by setting, (3) an assessment of the impact of the proposed development on the setting and significance of the assets, and (4) consideration of mitigation in those cases where there will be harm to significance.

¹ Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137. This principle has recently been confirmed, albeit in a lower court, in R (Wyeth-Price) v Guildford Borough Council.

2.5 The NPPF requires the impact on the significance of a designated heritage asset² to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 214 and 215 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.³ The Scale of Harm is tabulated at Appendix 1.

2.6 Paragraphs 214 and 215 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.⁴ Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 214 or 215 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

2.7 Paragraphs 212 and 213 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

2.8 One of the overarching objectives of sustainable development, as expressed in paragraph 8 of the NPPF, is mitigating and adapting to climate change, including moving to a low carbon economy. Historic England has a Climate Change Strategy, and has published Mitigation, Adaptation and Energy Measures. More specifically, Historic England has published a Heritage and Climate Change Carbon Reduction Plan (March 2022). These and similar strategies run in parallel with heritage-

² The seven categories of designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefield and Conservation Areas, designated under the relevant legislation.

³ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

⁴ The balancing exercise was the subject of discussion in City and Country Bramshill v CCSLG and others [2021] EWCA, Civ 320.

specific methodologies relating to the assessment of significance, and the effect of change on significance.

2.9 A full review of local policy has been undertaken as part of this assessment.

3. Statement of Significance

Assessment of Significance

3.1 This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF, and it comments on the contribution of setting to significance. The identification of the heritage assets equates to Step 1 of GPA3, and the assessment of significance equates to Step 2 of GPA3. Steps 2 and 3 of GPA3 are closely connected, so this chapter should be read in conjunction with Chapter 4 (Heritage Impact Assessment) and with the tabular methodology at Appendix 2.

Heritage Assets

Step 1

3.2 Background research and site visits were undertaken by HCUK in April 2023 in good weather. Prior to the site visits there were a number of designated heritage assets within the vicinity of the application site which were deemed potentially susceptible to impacts due to their relative proximity:

- Woodrow House Farmhouse (Grade II) and Gate piers and garden walls (separately listed as Grade II) situated c.710m to the northwest;
- Blackmore House (Grade II) situated c. 300m to the east;
- Church of St Andrew (Grade II) situated c. 400m to the west;
- 8 Church Lane (Grade II) situated c.340m to the west;
- The Melksham Conservation Area, c.1km to the west of the application site (at Hampshire Place boundary).

3.3 Following the initial assessment it was evident that Blackmore House, the Church of St Andrew, 8 Church Lane and the Melksham Conservation Area have no intervisibility with the application site and possess no historical association with the land which comprises the site.

3.4 In accordance with Step 1 of the GPA3 settings assessment these assets can therefore be scoped out of further assessment and are not considered to be susceptible to impact by the proposals, which would not be capable of causing an effect within their settings which could harm their significance.

3.5 Only Woodrow House Farmhouse (and its associated gate piers and garden walls) is considered to be potentially susceptible to impact. This asset is therefore discussed further below, in accordance with Step 2 of GPA3 settings assessment.

Step 2

Woodrow House Farmhouse, Grade II

3.6 The farmhouse was designated Grade II in 1985, and the list description provides the following information:

Farmhouse. Early C18. Rubblestone, double Roman tiled roof with coped verge and saddlestones and central stone stack. T-plan. 2 storeys, 2 windows. Two central doors, one to right is blocked, chamfered door case to left and canopied porch over both on wrought iron supports. To left is 4-light cyma mullioned window, to right is 3-light cyma mullioned window. Plat band and two 3-light cyma mullioned windows to first floor. To right is 2-storey shed extension with 2 casements, one 2-light cyma mullioned window to ground floor left. To rear is early C20 brick extension with half hipped tiled roof, added on to rubblestone wing of late C18, 2 storey with sash in moulded case to first floor. Interior not inspected. Probably built as 2 cottages.

3.7 The farmhouse is set within private gardens and is orientated towards Woodrow Road, where it is bounded by garden walls and gate piers, which are separately listed as Grade II. The significance of the farmhouse stems principally from its architectural interest and local historic interest, and to a lesser extent from the archaeological values of any retained and earlier historic fabric within the building.

3.8 With regard to its setting, the house is immediately surrounded by its own private gardens, which set it back from the roadside. From in front of its gates there is a clear view south-eastward, towards the application site, however the site itself is not clearly visible (Figures 2 and 3 below). The historic mapping and archival

information, including the Melksham Parish Tithe and apportionment, show no direct link between the farmhouse and the land which comprises the site, however, the information contained within the apportionment is not conclusive, and suggests a collective ownership and occupation of the land at the time.

3.9

It is also evident that even if Woodrow House Farmhouse is not directly associated with the land historically, as surrounding agricultural land it does more broadly possess a character which is 'in-keeping' with this historic farmstead. Those fields closest to the asset on the opposite side of the road do therefore provide surroundings which afford its better appreciation. These fields do not comprise part of the application site.

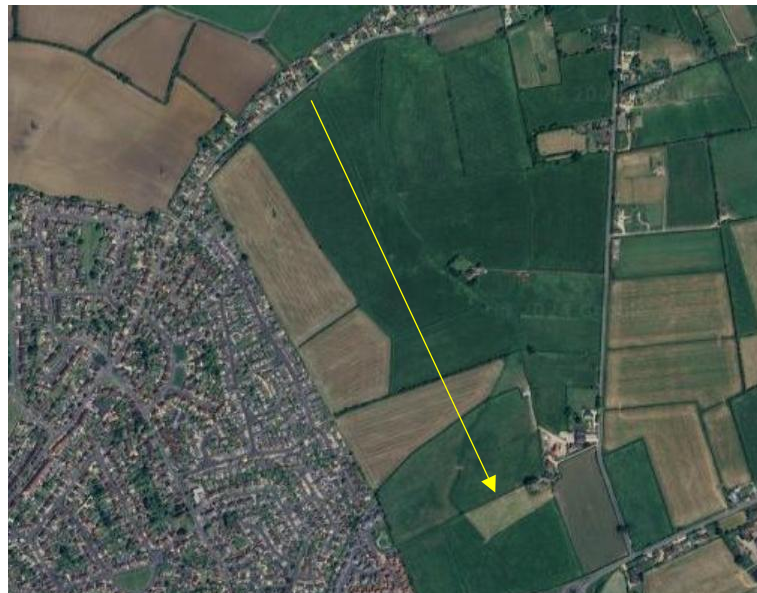


Figure 2 (above) showing location of Woodrow Farmhouse in relation to the closest boundary of the application site, and Figure 3 (below) showing the view towards the site from in front of the Farmhouse (roadside)





Figure 4 (above) showing view of Woodrow Farmhouse from the road, and Figure 5 (below) view along the road showing the Grade II listed gate piers and garden wall



4. Heritage Impact Assessment

Introduction

- 4.1** This chapter of the report assesses the impact of the proposed development on the significance of the heritage assets identified in the previous chapter, including any effects on the setting of those assets. It equates to Step 3 of GPA3, which has a close connection with Step 2. This chapter should be read in conjunction with the preceding chapter, and the tabular GPA3 assessment in Appendix 2.

Impact Assessment

Proposals

- 4.2** The outline application comprises residential development; public open space including formal play space and allotments; sustainable drainage systems and associated infrastructure; a 100 place nursery and access points for pedestrians and cyclists. All matters are reserved except for access, the principal point of access is to be provided from a new northern arm onto an improved arrangement of the Eastern Way/A3102 roundabout junction and an emergency access onto the A3102.

Effects on Woodrow House Farmhouse, Grade II

- 4.3** This section should be read alongside Appendix 2, which fully considers any potential effects of the proposals on the setting of Woodrow House Farmhouse.
- 4.4** Woodrow House Farmhouse (and its associated gate piers and garden walls, all Grade II) was identified during Steps 1 and 2 as being potentially susceptible to impact through effects within its setting. This is solely because the house is orientated towards Woodrow Road, and from in front of its gates there is a clear view south-eastward. However, it was evident from the site visit that there is not a clear view of the site itself, and that while the construction of housing on the site may create a visible change, its effect will be wholly minor.

- 4.5** There is a substantial physical and experiential separation between the farmhouse and the closest boundary of the application site, and with appropriate landscaping at the northern boundaries it is likely any view of the proposed housing would be sufficiently filtered and potentially no longer discernible within this view. It is also noted that the existing modern housing which forms the current eastern edge of Melksham forms part of the view from this asset, and as such the introduction of additional residential development would not be entirely out of character.
- 4.6** Overall, with the provision of a degree of landscape buffer/ screening to soften the northern edge of the proposed development, it is not considered that the level of change posed within the setting of Woodrow House Farmhouse would be sufficient to cause any level of harm to its significance.
- 4.7** Given the above there would be preservation for the purposes of Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990.

5. Conclusions

- 5.1** This Heritage Impact Assessment has been prepared by HCUK Group on behalf of Bloor Homes South West Ltd to inform and accompany an outline planning application for residential development on land at New Road Farm, Melksham.
- 5.2** An initial assessment including background research and site visit was undertaken by HCUK Group in April 2023 in order to inform the proposals, which have been developed in order to respond to any constraints and sensitivities within the local historic environment.
- 5.3** There are no listed buildings on the site, and it lies outside of the Conservation Area. The nearest Conservation Area is approximately 960m to the west (within the town centre area of Melksham). There are four Grade II listed buildings in close proximity to the site, two of which are 360m to the west within the town centre area, Blackmore House is approximately 300m to the east, and Woodrow House Farm and its railings is approximately 710m to the north.
- 5.4** The assessment identified one heritage asset, Woodrow House Farmhouse (and its gate piers and garden wall, all Grade II), as being potentially susceptible to impact through changes within its setting. However, following full consideration (and in agreement with the initial scoping set out within the LPA's Screening Opinion) the distance between the site and the asset prevents any notable effect.
- 5.5** With the provision of a degree of landscape buffer or screening to soften the northern edge of the proposed development, it is not considered that the level of change posed within the setting of Woodrow House Farmhouse would be sufficient to cause any level of harm to its significance as a designated heritage asset.
- 5.6** Given the above there would be preservation for the purposes of Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990.

Appendix 1

Scale of Harm (HCUK, 2019)

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 214 and 215, and guidance on NPPG).⁵

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

⁵ See NPPG 2019: "Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated." Paragraph 018 Reference ID: 18a-018-20190723.

Appendix 2

GPA3 Assessment: Historic England's guidance on setting

In assessing the effect of the proposals on the setting and significance of designated heritage assets, it is relevant to consider how the following factors may or may not take effect, with particular reference to the considerations in Steps 2 and 3 of GPA3. The following analysis seeks to highlight the main relevant considerations.

<i>Relevant Considerations</i>	Woodrow Farmhouse, Grade II
<i>Proximity of the development to the asset</i>	c. 750m at closest point.
<i>Proximity in relation to topography and watercourses</i>	N/A
<i>Position of development in relation to key views</i>	The application site falls within a view from outside the front garden of the asset, however it is not clearly discernible and does not fall within a shared view.
<i>Orientation of the development</i>	The development is orientated away from the asset.
<i>Prominence, dominance and conspicuousness</i>	The proposals will not be prominent, dominant or conspicuous in views from the asset due to the scale and massing and the distance between them. The asset itself is not a dominant or prominent feature, and its level of visibility will not be altered by the proposals.
<i>Competition with or distraction from the asset</i>	The proposals will not compete with or distract from the asset, and are not situated within any shared views.
<i>Dimensions, scale, massing, proportions</i>	The proposed scale and massing is proportionate with other residential surroundings of the application site and will not pose an effect on the asset.
<i>Visual permeability</i>	The visual permeability of the assets setting will not be altered by the proposals.
<i>Materials and design</i>	Materials and design are not finalised at this stage, however given the distance between the asset and the application site and the scale and massing of the housing proposed, it is

	unlikely the choice of materials and design would alter the identified effects.
<i>Diurnal or seasonal change</i>	Views from the asset itself across Woodrow Road would be lessened during the spring/ summer given that there is a row of trees along the inside of the front garden wall.
<i>Change to built surroundings and spaces</i>	The proposals will not alter the built surroundings and spaces of the asset.
<i>Change to skyline, silhouette</i>	There will be no change to the skyline or silhouette.
<i>Change to general character</i>	The proposals will entail the introduction of additional residential development within the broader surroundings of the asset, however modern housing already forms part of the character of the area and as such this change is considered to be very minor in effect.

Standard Sources

<https://maps.nls.uk>

<https://historicengland.org.uk/listing/the-list>

www.heritagegateway.org.uk

<http://magic.defra.gov.uk>

www.history.ac.uk/victoria-county-history

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Historic England (2017 edition)

Planning (Listed Buildings and Conservation Areas) Act, 1990

National Planning Policy Framework, December 2024

National Planning Practice Guidance, 2019

Conservation Principles, Policies and Guidance, Historic England (2008)