

Wiltshire Council Planning Consultation Response

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Application No: PL/2025/09183 and PL/2025/09182
New signage to the front elevation & at the rear carpark access with lighting over (Retrospective)
The Three Horseshoes, Frome Road, Bradford On Avon, BA15 1LA

Please find following comments in respect of the above application(s).

Recommendations:

☒	Comment
☐	Support in principle subject to amendments to the scheme (as set out below)
☐	Support subject to conditions (as set out below)
☐	Object (for reasons set out below)
☐	No objections

Scope of comments: the following comments relate to the built historic environment.

Policy: From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Section 16 requires that **special regard** be given to the desirability of preserving or enhancing listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 also requires the Council to pay **special attention** to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.

The NPPF outlines government policy, including its policy in respect of the historic environment. Section 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development. Paragraphs 214-216 of the NPPF require a balanced approach with any harm which would be caused being weighed against the potential public benefits which might be achieved. Paragraph 210 requires local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and of new development making a positive contribution to local character and distinctiveness.

National Planning Practice Guidance provides guidance on interpreting the NPPF.

The Council's Core Strategy Policy CP58 'Ensuring the conservation of the historic environment' requires that "designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance."

Wiltshire Council's Core Strategy Policy CP57 'Ensuring high quality design and place shaping': 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.

Historic England Advice Note 2 – Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for PP and LBC.

Site and assets considered: The property is a Grade II listed building in Bradford on Avon Conservation Area.

Proposal: The proposal seeks new signage to the front elevation and at the rear carpark access with lighting over (Retrospective).

Relevant planning history: None

Issues: impact on the significance of the listed building, impact on the setting of neighbouring listed buildings, impact on the character and appearance of the conservation area.

Information considered/provided: Paragraph 207 of the NPPF requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting. This should include sufficient information to provide a clear understanding of the significance of the heritage asset and its setting and the potential impact of any proposals on that significance. In this case, whilst the applications are accompanied by a "Design & Access Statement" the document provides limited information about the building and fails to provide any objective assessment of the fabric affected, its date or significance or of the impact of the proposals and, as a result, it fails to meet the requirements of the NPPF.

However, paragraph 208 of the NPPF also provides for the local planning authority to make its own assessment of impact and the following heritage recommendations are offered on this basis.

Significance of assets and contribution of setting: The NPPF defines significance as the "value of a heritage asset to this and future generations because of its heritage interest. The interest may be **archaeological**, **architectural**, **artistic** or **historic**. Significance derives not only from a heritage asset's physical presence, but also from its setting." Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place.

In this case the significance of the early 18 Century building lies largely with its historic fabric and architecture - its form, layout and architectural expression/detailing and use of high-quality design materials which have significant aesthetic and architectural interest and which contribute to the character of the conservation area.

The Three Horseshoes and Nos 1 to 4 (consec) Frome Road also forms a group with the Liberal Club, the Baptist Chapel, the Congregational Church and Hall and Nos 6 to 16 (consec), 19 to 22

(consec) 36, 42 to 49 (consec) and Westbury Hall, St Margaret's Street and No 1 St Margaret's Hill.

Assessment: The Three Horseshoes PH is a Grade II listed building in Bradford on Avon. The building is located on a primary route into the town centre and the rear faces the station carpark.

The proposal is for new signage to the front elevation and at the rear carpark access with lighting over. The application is retrospective.

There is no in principle objection to signage as this is a commercial premises, subject to this being sympathetic with the traditional appearance of the building and the character of the conservation area.

There is also no objection to the removal of the previous signage on the front elevation. However the drawings omit the sign on the northern gable end of the building, the preference is for this sign to also be removed.

In regard to the proposed signage on the front elevation, this is considered acceptable in terms of its size, materials and hand painted finish. However, the sign as erected is not as shown on the proposed drawings since the unauthorised sign has additional symbols and banners and the lettering is larger than that proposed. This makes the sign looking unduly cluttered with information. I am also concerned at the brash strident paint colours of the sign since these conflict with the traditional character of the building and detracts from the heritage assets.

In regard to the proposed three swan neck lights, this seems unnecessary as the building already has two lantern signs which as shown in the DAS lit the previous sign on the front elevation and the unauthorised sign. I can not find any planning history for these lights and consider them unauthorised. As such, if the swan neck lights are to be considered acceptable the existing lanterns would need to be shown as being removed from the proposed drawings. I would also request that the colour of the swan neck lights be specified.

Whilst commenting on the front elevation, I am also concerned at what appears to be an unauthorised CCTV camera on the face of the building and numerous signs attached to the front doors. All these fixtures require consent.

Turning to the rear elevation of the building, this has illuminated signage at high level on the gable end. There is no mention of this in this application and whether this is to remain or to be removed. If this is to remain, I see no need for duplicate signage on the lower wall since this will add visual clutter and a mismatch of corporate branding for the building. With the unauthorised sign, this is not as shown in the proposed drawing since 'live music' swags are included. Also the sign is missing its lower frame. The sign also seems to be functioning without the need for a swan neck light.

Summary & conclusion: The NPPF confirms that 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). It makes clear that any harm to a designated heritage asset requires clear and convincing justification.

As such amendments and further clarification is required.