

36 Bath Road, Bradford-on-Avon Wiltshire

Heritage Assessment



Report prepared for:
Crossman Acquisitions Ltd

CA Project: CR1964

CA Report: CR1964_1

August 2025



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Wiltshire

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SUMMARY

Project Name: 36 Bath Road

Location: Bradford on Avon, Wiltshire

NGR: 382468 , 161637

In May 2025 Cotswold Archaeology was commissioned by Crossman Acquisitions Ltd to undertake a Heritage Assessment in respect of a proposed scheme at 36 Bath Road, Bradford on Avon, Wiltshire. The assessment is required to inform decision making in relation to a proposed scheme for the demolition of some of the existing buildings on the Site, and for the construction of two self-build homes. The Site lies at the north edge of Bradford on Avon, close to the boundary of Bradford on Avon Conservation Area and adjacent to a Grade II Listed Building, 35 Bath Road.

A building assessment was undertaken to examine the extant buildings within the Site and assess the significance of the stone-built former farm buildings (Buildings A, C and L); it concluded that they qualified as non-designated heritage assets of low overall significance. The demolition of Buildings C and L will result in the total loss of these non-designated heritage assets and will trigger paragraph 216 of the NPPF (2024). It is considered that the proposed repair and alteration of Building A will preserve its overall historic character and help secure its long-term viable use, and the proposals will cause no harm to the non-designated heritage asset.

A staged settings assessment was also undertaken, in accordance with Historic England guidance (2017) which identified two designated heritage assets, Bradford on Avon Conservation Area and Bath Road Post Office (Grade II Listed), whose significance was identified in this assessment as being susceptible to the effects of the proposed scheme. A settings assessment for Bradford on Avon Conservation Area has identified that the Site does contribute positively (although to a limited degree) to its significance. The loss of the former farm buildings (with the exception of the former cow shed) will result in a very small level of less than substantial harm (lower end) to the significance of the Conservation Area. As such, the provisions of paragraph 215 of the NPPF (2024) are triggered and the very low level of harm should be assessed in the planning balance.

The assessment has also identified that the Site makes a positive (if limited) contribution to the significance of Bath Road Post Office. The assessment has concluded that the proposed scheme will result in a very small amount of less than substantial harm (lower end) to the

significance of the Listed Building through changes to its setting, and the very low level of harm should be assessed in the planning balance.

1. INTRODUCTION

- 1.1. In May 2025, Cotswold Archaeology was commissioned by Crossman Acquisitions Ltd to undertake a Heritage Assessment in respect of land at 36 Bath Road, Bradford on Avon, Wiltshire (hereafter referred to as ‘the Site’). The Site is located on the west side of Bath Road/A363, c. 686m north-west of Bradford on Avon town centre (NGR: 382468 , 161637; Fig. 1) and currently comprises an area of hardstanding and a group of small buildings which include three 19th-century structures and a number of mid-late 20th century structures. The extant buildings on the Site are in a poor state of repair and are currently in use as commercial garaging and storage.
- 1.2. This assessment is required to inform decision making with regard to a proposed scheme which will comprise the demolition of the majority of extant buildings on the Site, and the construction of two self-build residential units. It focuses on understanding the contribution that the extant buildings and Site make to the significance of nearby designated heritage assets as part of their setting, and the subsequent effects of the demolition of the majority of the Buildings and the addition of two new units on the Site to that special interest. Identified assets include the Bradford on Avon Conservation Area, and the Grade II Listed Bath Road Post Office (NHLE: 1300968).

Objectives and professional standards

- 1.3. Cotswold Archaeology is a Registered Organisation with the Chartered Institute for Archaeologists (CIfA). This report has been prepared in accordance with appropriate standards and guidance, including the ‘Historic Environment Good Practice Advice in Planning Note 1 (Second Edition): Conservation Area Appraisal, Designation and Management’ (Historic England 2019), ‘Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment’ (Historic England 2015) and ‘The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)’ (Historic England, 2017a).

Statute, policy and guidance context

- 1.4. The Site is located in the local authority of Wiltshire Council. The current local plan is the Wiltshire Core Strategy (adopted in 2015). The policy relevant to the Historic Environment is Core Policy 58: Ensuring the Conservation of the Historic Environment.

- 1.5. This assessment has been undertaken within the key statute, policy and guidance context presented within Table 1.1. The applicable provisions contained within these statute, policy and guidance documents are referred to, and discussed, as relevant, throughout the text. Fuller detail is provided in Appendix 1.

Statute	Description
National Heritage Act 1983 (amended 2002)	One of four Acts of Parliament providing for the protection and management of the historic environment, including the establishment of the Historic Monuments & Buildings Commission, now Historic England.
Planning (Listed Buildings and Conservation Areas) Act (1990)	Act of Parliament placing a duty upon the Local Planning Authority (or, as the case may be, the Secretary of State) to afford due consideration to the preservation of Listed Buildings and their settings (under Section 66(1)), and Conservation Areas (under Section 72(2)), in determining planning applications.
National Planning Practice Guidance (updated July 2019)	Guidance supporting the National Planning Policy Framework.
National Planning Policy Framework (2024)	Provides the English government's national planning policies and describes how these are expected to be applied within the planning system. Heritage is subject of Chapter 16 (page 59).
Wiltshire Core Strategy (2015)	Comprises the local development plan (local plan), as required to be compiled, published and maintained by the local authority, consistent with the requirements of the NPPF (2024). Intended to be the primary planning policy document against which planning proposals within that local authority jurisdiction are assessed. Where the development plan is found to be inadequate, primacy reverts to the NPPF (2024).
Conservation Principles (Historic England 2008)	Guidance for assessing heritage significance, with reference to contributing heritage values, in particular: <i>evidential</i> (archaeological), <i>historical</i> (illustrative and associative), <i>aesthetic</i> , and <i>communal</i> .
Good Practice Advice in Planning: Note 2 (GPA2): Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015)	Provides useful information on assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.
Good Practice Advice in Planning: Note 3 (GPA3): The Setting of Heritage Assets, Second Edition (Historic England, 2017a)	Provides guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.

Table 1.1 Key statute, policy and guidance

2. METHODOLOGY

Data collection, analysis and presentation

- 2.1. This assessment has been informed by a proportionate level of information sufficient to understand the significance of the extant buildings; the significance of identified heritage assets, including Bradford on Avon Conservation Area and the Grade II Listed Bath Road Post Office, and any potential development effects. This approach is in accordance with the provisions of the NPPF (2024). The data has been collected from a wide variety of sources, summarised in Table 2.1.

Source	Data
National Heritage List for England (NHLE)	Current information relating to designated heritage assets, and heritage assets considered to be 'at risk'.
Heritage Gateway	Online resource detailing the Historic Environment records in the environs of the Site.
Published, grey-literature and online sources (Victoria County History, etc.)	Pertaining to the history and development of Bradford on Avon, 19th century farmsteads, and heritage assets more generally.
Genealogist, Envirocheck, National Library of Scotland & other cartographic websites	Historic (Ordnance Survey and Tithe) mapping in digital format.
National Heritage List for England (NHLE)	Current information relating to designated heritage assets, and heritage assets considered to be 'at risk'.

Table 2.1 Key data sources

Building survey and site visit

- 2.2. A site visit was undertaken on 03 June 2025 by Hannah Blackmore, Historic Buildings Consultant. The objective of the site visit was to assess and photograph the Buildings within the Site and the wider Site environs to inform the analysis contained within this report. The survey of the Buildings was undertaken to a Historic England Level 1-2 standard as contained in their guidance Understanding Historic Buildings, a Guide to Good Recording Practice (2016); this is a basic external and internal survey and is usually used to understand whether further survey may be required and to inform an understanding of any heritage significance.

Settings Assessment

- 2.3. This work takes the form of a settings assessment. It is specifically focused on understanding the potential impact of the proposed development on the significance

of heritage assets as a result of alteration to those parts of their setting which contribute to their significance and the way they are experienced. As described above, the focus of the work will assess the extent and type of any contribution of setting to the significance of the Bradford on Avon Conservation Area and the Grade II Listed Bath Road Post Office (NHLE 1300968).

- 2.4. The work is informed and underpinned by the best practice methodology published in Historic England's Good Practice Advice in Planning Note 3 (GPA3) guidance on *The Setting of Heritage Assets* (2017a). The physical and experiential setting of the assets are examined in proportionate detail, including what aspects or attributes of setting contribute positively, negatively or do not contribute to significance. As GPA 3 states:

'a thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it' (p2).

- 2.5. As is described in GPA3, not all aspects of an asset's setting contribute to their significance, in other words, some elements of setting do not contribute, or the contribution is neutral. The guidance is also clear that consideration of views, which are a part of settings assessments, can be valued for reasons other than their contribution to heritage significance. The guidance states in referring to views:

'they may, for example, be related to the appreciation of the wider landscape, where there may be little or no association with heritage assets. Landscape character and visual amenity are also related planning considerations.....the consideration of views in the planning process may be partly or wholly separate from any consideration of the significance of heritage assets (p1).'

- 2.6. This makes it clear that it is important to understand what parts of a setting are relevant to an understanding and appreciation of the asset, and what are not. There can often be confusion or misunderstanding in this regard, as some aspects of setting can be pleasing, attractive and cherished, but not contribute to heritage value. As identified in the above quote in paragraph 2.6, considerations related to urban design and townscape amenity are often conflated with effects on heritage significance.

2.7. This assessment will undertake Steps 1-3 of the staged approach advocated in GPA3; Step 1 looks to identify which assets may be potentially affected by changes in their setting. Step 2 assesses the degree to which these settings make a contribution to the heritage significance of the asset or allow significance to be appreciated. This is done by developing an understanding of the specific values (historic, evidential and aesthetic) contributing to overall significance and secondly analysing how and what aspects of setting contribute to those specific values. Step 3 assesses the effects of potential development on significance bearing in mind and utilising the findings of Step 2. The assessment has been informed by a site visit undertaken on 27 June 2024.

2.8. Historic England is also clear within the guidance that conserving the significance of heritage assets by taking their settings into account need not prevent change and goes on to state:

‘many places coincide with the setting of a heritage asset and are subject to some degree of change over time’ (p.8)

2.9. For a development to result in harm to a heritage asset it must have the potential to impact its heritage significance negatively or to harm the way in which it is understood and experienced. Change to the character of setting does not necessarily result in harm to its significance. Whether the change to the setting has a harmful impact on the specific values which form overall significance, is the sole matter for consideration.

2.10. As part of this settings assessment, the listing description of the Grade II Listed Bath Road Post Office was consulted along with the Bradford on Avon Conservation Area Appraisal (West Wiltshire District Council, 2003), and a site visit and study area walkover were undertaken to assess and document the setting of the designated heritage assets in accordance with the staged settings assessment process recommended by Historic England.

Assessment of heritage significance

2.11. The significance of known and potential heritage assets within the Site, and any beyond the Site which may be affected by the proposed development, has been assessed and described, in accordance with paragraph 207 of the NPPF (2024), the guidance issued by ClfA (2020), Historic Environment Good Practice Advice in Planning Note 2 (Historic England 2015) and Advice Note 12: Statements of Heritage

Significance: Analysing Significance in Heritage Assets (Historic England 2019) Determination of significance has been undertaken according to the industry-standard guidance on assessing heritage value provided within Conservation Principles (English Heritage 2008). This approach considers heritage significance to derive from a combination of discrete heritage values, principal amongst which are: i) evidential (archaeological) value, ii) historic (illustrative and associative) value, iii) aesthetic value, iv) communal value, amongst others. Further detail of this approach, including the detailed definition of those aforementioned values, as set out, and advocated, by Historic England, is provided in Appendix 1 of this report.

Assessment of potential development effects (benefit and harm)

- 2.12. The present report sets out, in detail, the ways in which identified susceptible heritage assets might be affected by the proposals, as well as the anticipated extent of any such effects
- 2.13. Identified effects upon heritage assets have been defined within broad ‘level of effect’ categories (Table 2.2). These are consistent with key national heritage policy and guidance terminology, particularly that of the NPPF (2024). This has been done in order to improve the intelligibility of the assessment results for purposes of quick reference and ready comprehension. These broad determinations of level of effect should be viewed within the context of the qualifying discussions of significance and impact presented in this report.
- 2.14. It should be noted that the overall effect of development proposals upon designated heritage assets are judged, bearing in mind both any specific harms or benefits (an approach consistent with the Court of Appeal judgement *Palmer v. Herefordshire Council & ANR* Neutral Citation Number [2016] EWCA Civ 1061).
- 2.15. In relation to non-designated heritage assets, the key applicable policy is paragraph 216 of the NPPF (2024), which states that:

*‘The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the **scale of any harm or loss** and the **significance of the heritage asset** [our emphasis].’*

- 2.16. Thus with regard to non-designated heritage assets, this report seeks to identify the significance of the heritage asset(s) which may be affected, and the scale of any harm or loss to that significance.

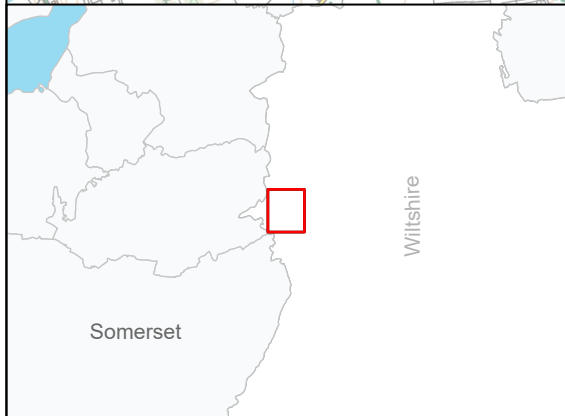
Level of effect	Description	Applicable statute & policy
Heritage benefit	The proposals would better enhance or reveal the heritage significance of the heritage asset.	Enhancing or better revealing the significance of a heritage asset is a desirable development outcome in respect of heritage. It is consistent with key policy and guidance, including the NPPF paragraphs 203 and 219.
No harm	The proposals would preserve the significance of the heritage asset.	Preserving a Listed building and its setting is consistent with s66 of the Planning (Listed Buildings and Conservation Areas) Act (1990). Preserving or enhancing the character or appearance of a Conservation Area is consistent with s72 of the Act. Sustaining the significance of a heritage asset is consistent with paragraph 203 of the NPPF, and should be at the core of any material local planning policies in respect of heritage.
Less than substantial harm (lower end)	The proposals would be anticipated to result in a restricted level of harm to the significance of the heritage asset, such that the asset's contributing heritage values would be largely preserved.	In determining an application, this level of harm should be weighed against the public benefits of the proposals, as per paragraph 215 of the NPPF. Proposals involving change to a Listed building or its setting, or any features of special architectural or historic interest which it possesses, or change to the character or appearance of Conservation Areas, must also be considered within the context of Sections 7, 66(1) and 72(2) of the 1990 Act. <i>The provisions of the Act do not apply to the setting of Conservation Areas.</i>
Less than substantial harm (upper end)	The proposals would lead to a notable level of harm to the significance of the heritage asset. A reduced, but appreciable, degree of its heritage significance would remain.	Proposals with the potential to physically affect a Scheduled Monument (including the ground beneath that monument) will be subject to the provisions of the Ancient Monuments and Archaeological Areas Act (1979); <i>these provisions do not apply to proposals involving changes to the setting of Scheduled Monuments.</i> With regard to non-designated heritage assets, the scale of harm or loss should be weighed against the significance of the asset, in accordance with paragraph 216 of the NPPF.

Level of effect	Description	Applicable statute & policy
Substantial harm	The proposals would very much reduce the heritage asset's significance or vitiate that significance altogether.	Paragraphs 212 - 215 of the NPPF would apply. Sections 7, 66(1) and 72(2) of the Planning Act (1990), and the Ancient Monuments and Archaeological Areas Act (1979), may also apply. In relation to non-designated heritage assets, the scale of harm or loss should be weighed against the significance of the asset, in accordance with paragraph 216 of the NPPF.

Table 2.2 Summary of level of effect categories (benefit and harm) referred to in this report in relation to heritage assets, and the applicable statute and policy.

Limitations of the assessment

- 2.17. The assessment of the significance of the designated heritage assets is principally based upon a site visit and settings field inspection undertaken on 02 June 2025. Access to the upper level of Building L (Fig. 5) was not possible at the time of survey. This has been supplemented by secondary information derived from a variety of sources, only some of which have been directly examined for this assessment. The assumption is made that this data, as well as that derived from other secondary sources is reasonably accurate.



Site



0 1 km

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PROJECT TITLE
36 Bath Road

FIGURE TITLE
Site Location Plan

DRAWN BY HB PROJECT NO. CR1964
CHECKED BY SH DATE 21/08/2025
APPROVED BY SH SCALE @ A4 1:25,000

FIGURE NO.

1

3. HISTORICAL BACKGROUND

Townscape context

- 3.1. Bradford on Avon is a historic market town located in west Wiltshire, England, close to the Somerset border. It is situated partly in the Avon Valley and partly on the hill marking the Vale's western edge and is approximately 8 miles (13 km) southeast of Bath, in a hilly region bordered by the Mendip Hills, Salisbury Plain, and the Cotswold Hills. The town's name is believed to originate from the Old English words "brād" and "ford," meaning "place at the broad ford." The "Avon" comes from the Celtic name for the river running through the town, simply meaning "river" (Wiltshire Council, 2008).
- 3.2. The earliest mention of Bradford on Avon is in the Anglo-Saxon Chronicle, identifying it as the site of the Battle of Witgenesburg in 652 CE. By 705 CE, St. Aldhelm had founded a monastery there. In 955 CE, Saxon King Eadred bequeathed the monastery and town to the abbey in Winchester. The town was a small trade centre by 1086 and the area of St. Margaret's is named after St. Margaret's Hospital, possibly a leper hospital founded around 1235, indicating the main settlement had moved across the Avon by then. The first stone bridge was built in this century, linking the town's two halves. Bradford on Avon's economy historically centred on the cloth trade (*ibid*).
- 3.3. The town suffered from plagues in 1609 and 1646, and a decline in the wool industry led to poverty and little building work. However, the town revived later in the 17th century, despite a major fire in 1742. The wool trade continued to flourish into the 18th century, with several fulling mills and dyehouses operating. Other industries included iron foundries, rug-making, leatherworking, and brewing. Transport improvements, such as the Kennet and Avon Canal (1809) and the railway (1857), facilitated growth.

Historic context of Bath Road and the 'Bearfield' area

- 3.4. The town had grown gradually with its economy centred on the cloth trade. Prosperous merchants built grand houses along the main streets, while more modest weavers' houses were constructed on the slopes surrounding the town's core. Several mills were situated on the low, often boggy land along the River Avon.
- 3.5. The area to the south of Ashley Road and west of Bath Road, focused around Huntingdon Street, was historically known as 'Bearfield'. Although it has changed and been significantly developed since the 19th century, it is still colloquially referred to

as the Bearfield area. Bath Road and Bearfield area of Bradford on Avon is located high on the plateau on the northern outskirts of the town.

- 3.6. This area shows the greatest variation in building dates and architectural styles however the buildings are unified by their stone construction. The focal point of the area is Christ Church, which is located at the top of the hill on the main route out of the town centre. This church was built in 1843 on the northern outskirts in response to deteriorating conditions in the town centre in the early 19th Century¹.
- 3.7. This area is predominantly in residential use, although there is a pub and a community centre. There is a strong ecclesiastical presence with Christ Church located in a prominent position at the top of the hill and a number of smaller chapels within the residential area. Some of the chapels are now converted to residential use such as the Providence Baptist's Chapel incorporated within the terrace known as Bearfield Buildings. A school is located to the north of Christ Church, just outside of the Conservation Area. The presence of the school influences how the wider area is used and there is plenty of activity at certain times of day with many of the local pedestrian routes well-used. There is little remaining evidence of industrial buildings related to the cloth trade in this part of the town however there is a former mill in Sladesbrook now converted for residential use¹.
- 3.8. To the north, immediately beyond the Conservation Area the land is mostly in agricultural use and is a mix of arable and pasture. In the past, there were a number of farmsteads nearby, including Lower Bearfield Farm, which historically incorporated both the Site and the Grade II Listed Bath Road Post Office, which was the former farmhouse. The farmhouse is of 17th century date, and Lower Bearfield Farm appears on mapping from as early as 1808. The farm fell out of use at some point during the 20th century, when the farmhouse was then used as the Bath Road sub-post office until the 1990's. Historically this area was associated with a large number of formal orchards, however these have all been lost due to recent development in the 20th century.

Historic Map Regression

- 3.9. One of the earliest available maps of the area is the 1767 map of Bradford on Avon, however this does not include the area where the Site is located. The 1808 map of

¹<https://www.yumpu.com/en/document/read/43274783/bradford-on-avon-conservation-area-character-wiltshire-council>

Bradford on Avon by Andrews and Drury² (not reproduced) depicts a wider area, including the Site. The area is labelled as 'Berfield', and the layout of Bath Road and Ashley Road can be seen, with settlement predominantly located to the south side of Ashley Road and the junction around Bath Road. There are two rectangular buildings depicted in the area where the Site is now located; one on a north-south axis addressing Bath Road, which is almost certainly the Grade II Listed Bath Road Post Office (17th century in origin) which was in use as a farmhouse until the mid-20th century. The second building is located to the north-west of the Listed Building and is on a roughly east-west axis. Based on later mapping, this is believed to be the former farm building now located within the Site, referred to in this report as Building L (see Fig. 5).

- 3.10. The 1840 Tithe map, as available at Genealogist does not show the area of the Site, however it is shown on the Wiltshire Tithe map available at Know Your Place³. This map shows a similar arrangement, with the farmhouse and outbuilding both present as depicted on the 1808 map. This mapping also shows the area surrounding Lower Bearfield Farm to be largely rural, with Bearfield House present to the east, set within its own landscaped grounds, and other dwellings located along Ashley Road. The farmstead is directly bordered by Bath Road to the east, and by a series of long, roughly rectilinear fields on an east-west alignment to the north and west.
- 3.11. Genealogist lists the plot which contains the farmhouse (now the Bath Road Post Office) and the late 18th or early 19th century farm building (Plot 2034) as a 'farm house, garden and homestead', occupied by Benjamin Hart. There were six other plots which were part of the farm that later came to be known as Lower Bearfield Farm, comprised of pasture land to the west and north of the farmstead on the east side of Bath Road.

Plot	Landowner	Occupier	Description
2025	Thomas Shewell Bailward, Esquire	Benjamin Hart	Pasture
2029	Thomas Shewell Bailward, Esquire	Benjamin Hart	Pasture
2030	Thomas Shewell Bailward, Esquire	Benjamin Hart	Pasture
2031	Thomas Shewell Bailward, Esquire	Benjamin Hart	Pasture
2032	Thomas Shewell Bailward, Esquire	Benjamin Hart	Pasture

² https://www.freshford.com/map_1808.htm

³ <https://maps.bristol.gov.uk/kyp>

2033	Thomas Shewell Bailward, Esquire	Benjamin Hart	Pasture
2034	Thomas Shewell Bailward, Esquire	Benjamin Hart	Farm House, Garden, and Homestead

Table 3.1 Tithe Apportionments from 1840 Bradford on Avon Parish Tithe map

- 3.12. By the time of the 1886-1887 Ordnance Survey map (Fig. 2), a number of additional farm buildings had been constructed at Lower Bearfield Farm. In addition to the original Building L, a further five buildings are depicted; these include the open-sided cow shed (Building A) adjacent to Bath Road and the stone-built building referred to as Building C in this report, which has what appears to be external animal pens attached to its south-west elevation (see Fig. 5). A rectangular structure with external animal pens is located just to the north-west of the main farmstead with a series of three external animal pens to its south-east elevation; this appears to be the building which now houses the Manu healthcare centre, and is no longer in the same ownership as the former farmstead. There is also a small rectangular building on a north-east, south-west axis located on the west side of Building C, and a small rectangular structure in the south-west corner of the site lying adjacent to Bath Road, neither of which are still extant.
- 3.13. The 1886-1887 mapping also shows some changes to the landscape beyond the farmstead. Bearfield House is still extant as a private dwelling to the east of Bath Road, with extensive grounds crisscrossed by a series of driveways and pathways and extensive tree planting. The area to the south of the farmstead, while retaining a semi-rural character, is more significantly developed. There are a series of terraced dwellings along the west side of Bath Road, extending south-east towards the area of Christ Church.

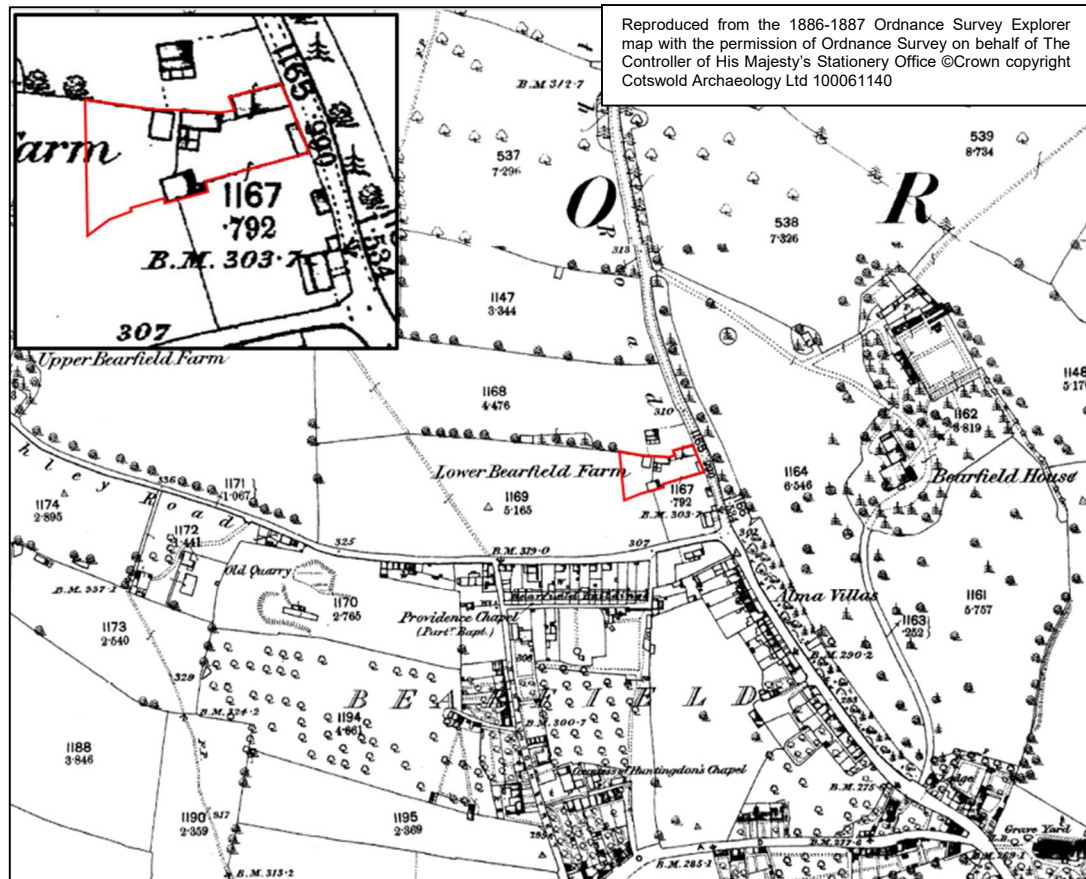


Fig. 2 Extract of the 1886-1887 Ordnance Survey map

- 3.14. The area around and to the south of Ashley Road is still labelled as 'Bearfield' and appears as a small residential/farming area which is connected to the rural landscape to the north and west, and lies largely separate Bradford on Avon proper. The Bearfield area has number of dwellings focused around Ashley Road and Huntingdon Street; this includes the significant terrace of Bearfield Buildings to the south side of Ashley Road (now Grade II Listed⁴), which includes Providence Baptist Chapel. There is also a chapel labelled as the Countess of Huntingdon's Chapel to the south-east, which is now known as Bearfield Congregational Chapel and is Grade II Listed⁵.
- 3.15. There are several orchards in the Bearfield area, and the buildings were still largely surrounded by agricultural fields at this time, particularly to the west and north. There was also an 'old quarry' area depicted on the south side of Ashley Road.

⁴ <https://historicengland.org.uk/listing/the-list/list-entry/1200552>

⁵ <https://historicengland.org.uk/listing/the-list/list-entry/1364516>

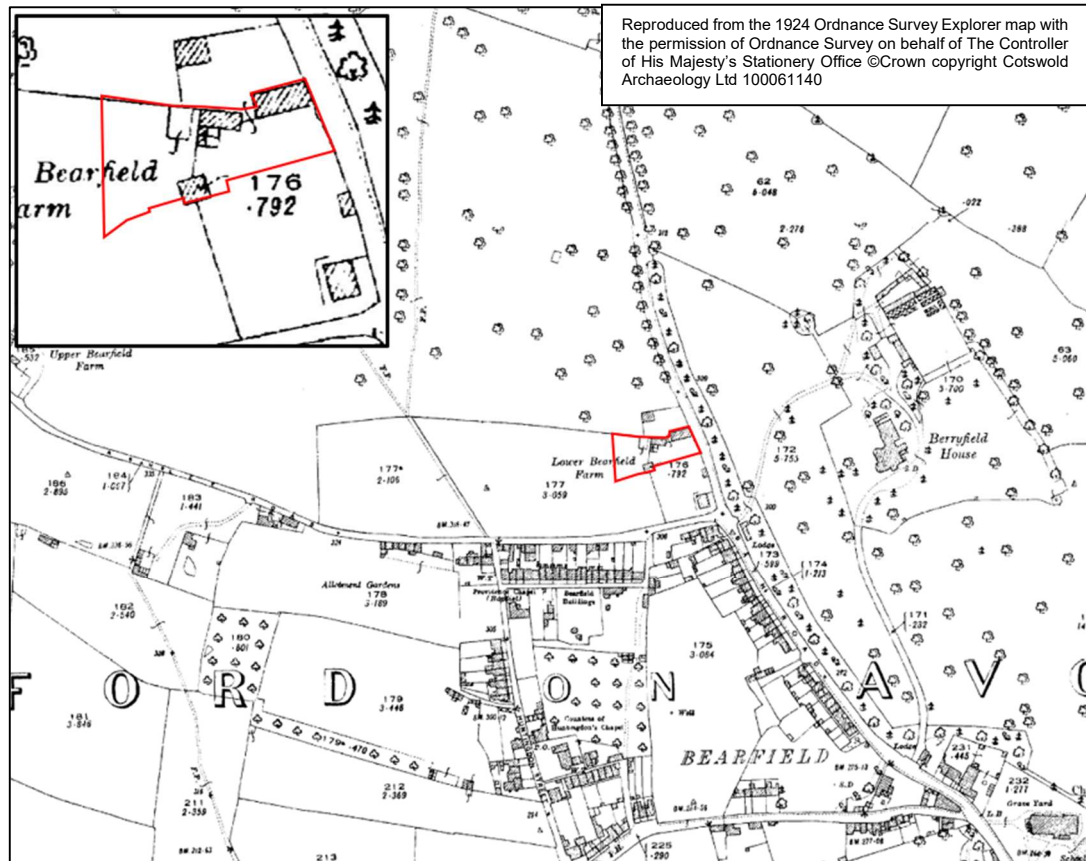


Fig. 3 Extract of the 1924 Ordnance Survey map

- 3.16. The 1924 Ordnance Survey map (Fig. 3) reveals some changes to the Lower Bearfield Farmstead, although it is still recognisable from its late 19th century form. The outline of the rectangular building to the west of Building C is still shown, but it is not hatched in to depict it as a building, suggesting it has either been removed or was perhaps always some kind of animal enclosure. The small rectangular building in the south-east corner of the site has also been removed, and the external animal pens have been removed from the building to the north-west (the Manu healthcare centre building). The surrounding landscape to the west and north of the farmstead has also been altered; the rectilinear field which directly borders the farmstead to the west still remains, however other field boundaries have been removed, changing a landscape of historically enclosed fields to an open and partially tree-covered landscape. This indicates a change of use within the landscape, and possibly reflects an economic downturn in the farm's fortunes, particularly as it is known that the farm fell out of use in the mid-late 20th century. The wider Bearfield Area appears to be largely unchanged, however, from the late 19th century, although the extent of the formal orchards in the area has been reduced.

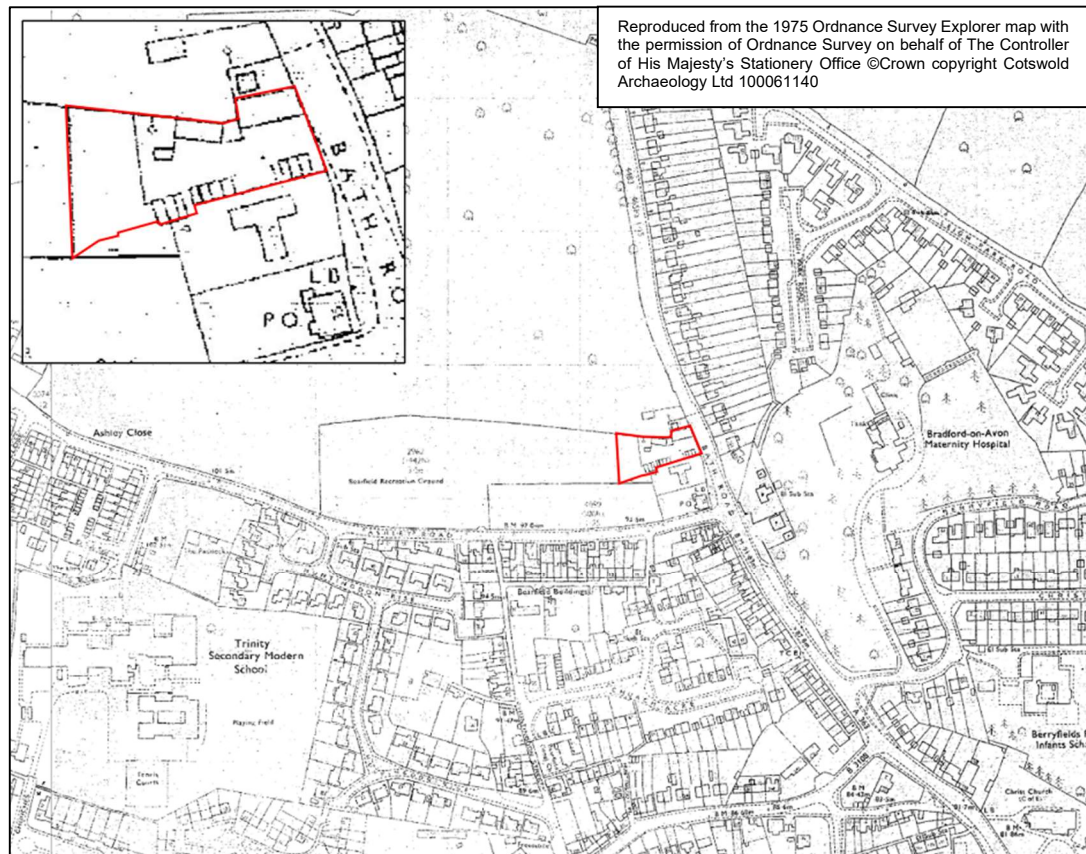


Fig. 4 Extract of the 1975 Ordnance Survey map

- 3.17. By the time of the 1975 Ordnance Survey map (Fig. 4), Lower Bearfield farm had ceased to exist. The farm had closed at some point during the mid-late 20th century, with the former farmstead and farmhouse being split under separate ownership; by the time of the 1975 Ordnance Survey the farmhouse was in use as a post office. A new dwelling (36 Bath Road) has been constructed between the former farmstead and the farmhouse; the Buildings known as A, C and L are still *in situ*, and the historic farmstead arrangement remains partially legible, although a number of late 20th century garages have been added to the site which somewhat obscures the historic layout.
- 3.18. The rectilinear field bordering the former farmstead to the west has been subdivided, with two smaller parcels of land adjacent to 35 and 36 Bath Road appearing to remain in duplicate ownership. The wider rectilinear field's outer boundaries remain legible, but this area of land had been brought into use as the Bearfield recreation ground and was no longer in agricultural use by 1975.
- 3.19. The wider area surrounding the Site had also significantly changed by this date, having been transformed by extensive residential and commercial development. A

series of semi-detached residential dwellings had been constructed along the east side of Bath Road, stretching far to the north of the Site, and the former Bearfield House was in use as a hospital by this time, with further development within its former landscaped grounds and to the south-east. The Bearfield area had also been almost completely surrounded by modern development by the late 20th century, subsuming this once largely separate and self-contained rural enclave within the urban sprawl of the growing town. All of the historic orchards and most of the surrounding fields had been built over by this date.

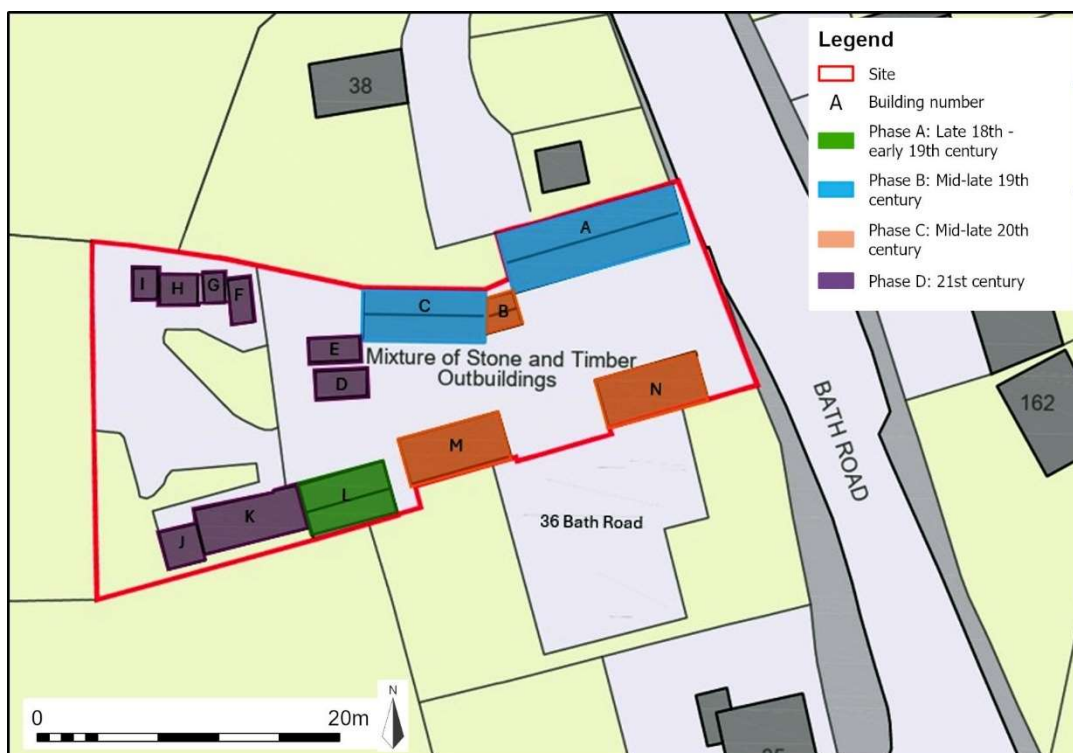


Fig. 5 Phased site plan



Fig. 6 Site plan with photo locations

4. BUILDING ASSESSMENT

Introduction

- 4.1. There are 14 buildings on the Site; some are detached structures while others are attached. Of these buildings, three are of 19th century origin and have been subject to both an internal and an external record; the other buildings date from the mid-20th century onwards and have been subject to a basic external record only. For the sake of clarity in the report, the buildings have been given letter references, and annotated existing plans have also been utilised within this assessment and to show phases of development and photo viewpoints (Fig. 5 and Fig. 6).
- 4.2. The Site is a rectangular plot located on the west side Bath Road/A363 where it lies adjacent to the roadside and extends further westwards towards Bearfield recreation ground. To the north of the Site lies the plot of 37 and 38 Bath Road, which includes a stone building that appears on the 1st Edition Ordnance Survey map⁶ (not reproduced) and may originally have been part of Lower Bearfield Farm, and now hosts a healthcare centre. The Site is bordered to the south by the plot of the house at 36 Bath Road, and a series of semi-detached mid-20th century houses lie opposite the Site on the east side of Bath Road.
- 4.3. As discussed in Chapter 3, the Site forms the surviving components of the former Lower Bearfield Farm (HER ref: MWI68459), a 19th century farmstead (Photos 1 and 2). Of the farmstead buildings as depicted on the 1st Edition Ordnance survey (Fig. 2), there appear to be four remaining; one of these is now under separate ownership in the plot of 37 and 39 Bath Road. The remaining three are located within this Site and comprise an open-sided cow shed (Building A) and two further stone buildings (Buildings C and L), one of which is possibly a former stable building or earlier cattle shelter with hayloft over (Building L); see Figure 5. The rest of the Buildings are of late 20th or early 21st century date and comprise a mixture of garage blocks, timber buildings and other modern structures.

⁶ <https://maps.nls.uk/view/106028428>



Photo 1 Overview of the Site from Bath Road, looking west



Photo 2 View into the Site, looking west

Building A

- 4.4. Historic mapping indicates that Building A was constructed around the mid-late 19th century, and was extant by 1886. It is one of three surviving stone-built farm buildings on Site associated with the former Lower Bearfield Farm, and is considered to have some limited heritage significance. Building A is situated in the north-west corner of

the Site and its east elevation directly addresses Bath Road. The building is a former detached former open-sided cow shed. It is a single-storey structure with a rectangular planform and is aligned on a north-east to south-west axis (Photo 3). Its open-sided elevation has seven bays formed by six timber posts resting on padstones, and faces south to overlook what would have been the former farmyard (Photo 3).



Photo 3 **Building A: south-east elevation**



Photo 4 **Building A: north-east and north-west elevations of Building A, as viewed from Bath Road**

-
- 4.5. The Building is constructed of coursed random limestone rubble walling with a gabled roof structure (Photo 4). The roof is presently covered in pantiles but may have historically been covered in stone tiles, as is seen on many of the other traditional buildings in the town, and there do appear to be remnants of some tiles at eaves level on the north elevation (see Photo 4).
- 4.6. The interior of the building is open, with the exception of the eastern end, which has been converted to form a separate garage with timber door (Photo 3). There are six timber king-post trusses with clasped purlins and a series of common rafters which make up the roof structure, and the roof tiles have been nailed onto timber battens (Photo 5 and Photo 6). There is a single door opening on the north side of the south-west elevation, and evidence of a blocked opening on the west side of the north-west elevation, but otherwise no features of note.



Photo 5 **Building A: interior view, looking north-east**



Photo 6 **Building A: interior view, looking south-west**

Building B

- 4.7. Historic mapping shows that this structure was constructed somewhere between 1925 and 1975. Access to the interior was not possible at the time of the site visit, but it appears to be a simple timber-framed structure with external painted weatherboarding, corrugated metal roof and an up and over garage door (Photo 7). It was likely built as a small garage or for storage purposes, and has no heritage significance.



Photo 7 **Building B: South-west elevation**

Building C

- 4.8. Historic mapping indicates that Building C was constructed around the mid-late 19th century, and was extant by 1886. It is one of three surviving stone-built farm buildings on Site associated with the former Lower Bearfield Farm, and is considered to have some limited heritage significance
- 4.9. Building C is situated on the north side of the Site; it is a one-storey structure with rectangular planform and is orientated on an east-west axis, with its principal south-facing elevation overlooking the former central farmyard (Photo 8). It has been heavily altered both internally and to the south elevation to create four garages with modern up-and-over doors, which has somewhat obscured its historic appearance and form. Its original function is unclear, although at one stage it had external animal pens (Fig. 2) and was likely used as an animal shelter.



Photo 8 **Building C: south elevation**

Exterior

- 4.10. The Building is constructed of coursed random limestone rubble walling with a gabled roof structure (Photo 8). The roof is presently covered in pantiles but may have historically been covered in stone tiles, as is seen on many of the other traditional buildings in the town. The south-west elevation has been altered with modern

blockwork to create four garage bays, although a small limestone buttress and part of the original wall remains; there is a small window in the west elevation wall.



Photo 9 **Building C: roof structure**



Photo 10 **Building C: material detail**

Interior

- 4.11. The interior of the Building has been altered and subdivided, although the painted rubble walls were partially visible (Photo 10). The roof structure is exposed internally; the roof trusses are of a very simple and rustic form of principal rafters, tie beams and clasped purlins with common rafters and battens supporting the roof covering. There were no other visible historic features of note (Photo 9).

Building D

- 4.12. Building D is a small modern garage constructed in the late 20th century, with blockwork walls, a flat corrugated roof covering and timber garage doors (Photo 11 and Photo 12). As with the other late 20th century buildings on site it was built as a garage/storage facility. It has a rectangular planform and is aligned on an east-west axis. The building has no heritage significance. At its north-east corner it is attached to a section of limestone rubble walling which connects to the south-west corner of Building C. This section of wall is a 19th century survival and is probably the rear (west) wall of the former animal pens which once stood in this location (see Fig. 2).



Photo 11 **Building D: east elevation**



Photo 12 **Building D: south elevation**

Building E



Photo 13 **Building E overview, looking south-east**

- 4.13. This structure appears to be a 21st century metal storage container located adjacent to Building C and Building D; it has no heritage significance (Photo 13).

Buildings F- I



Photo 14 **Buildings F-I, looking north-west**

- 4.14. Building F is a small rectangular prefabricated metal storage unit with roller door to the south elevation. Building G is a smaller rectangular prefabricated metal storage unit with south-facing timber door. Building H is a rectangular timber stable building with a south-facing stable door sheltered by a flat overhanging roof structure. Building I is a freestanding shipping container (Photo 14). These structures were all added in the late 20th or 21st century and have no heritage significance.

Buildings J and K

- 4.15. Building J is a freestanding timber shed with north-facing door and corrugated roof. Building K is a timber stable building with plywood sheets to the exterior, a flat corrugated roof, and four individual stable units; three with north facing doors and one with a west facing door (Photo 15). These structures were all added in the late 20th or 21st century and have no heritage significance.



Photo 15 **Buildings J and K, looking south-west**

Building L

- 4.16. Building L appears to be one of, if not the earliest of the farmstead buildings at the former Lower Bearfield Farm, as it is the only former farmstead building that was extant on the 1808 map of the Bearfield area². As such, it likely dates from the late 18th or very early 19th century and is considered to have some limited heritage significance. The Building has been heavily altered to the north facing elevation, however the evidence of surviving fabric suggest it may have been a stable building, with space for the horses on the ground floor and a possible hay loft over at first floor level.

Exterior

- 4.17. The Building has a rectangular planform and is orientated on a north-east to south-west axis with the front elevation facing north towards the former farmyard (Photo 16). It is constructed of coursed random limestone rubble with a steeply pitched and pantile-covered roof; many of the local traditional buildings have stone or slate roofs, and this was probably the historic roof covering for Building L.
- 4.18. The north-west elevation has been altered in the 20th century to form three bays, each with an up-and-over timber garage door. There is a single opening in the north-east elevation, with dressed stone surrounds and a timber stable door. There is a

smaller opening in the south-west elevation at roof level with timber batten hatch door, which is a further indication that this may have been a former hayloft area.



Photo 16 **Building L: north-west (principal) and north-east elevations**

Interior

- 4.19. The interior of the building is comprised of one open space. The walls are of painted rubblestone, and there is access through the three modern garage doors, as well as the timber stable door on the north-east elevation. There is a blocked-up former opening on the north side of the south-west elevation (Photo 17). The floor is formed of cobbles with a drainage channel laid along the centre of the room, both features typical of stable buildings (Historic England 2017b).
- 4.20. There is a timber floor above the ground floor room, formed by a series of transverse beams supporting timber axial joists, above which are laid the timber floorboards. This area appears to be the former hayloft (Photo 18). There are two hatch openings into this area, one in the centre of the room and one at the east end of the ground floor, which still has a timber access ladder *in situ*. The upper level was not accessible at the time of survey. The reuse of the building appears to have removed any former fixtures or fittings related to former use, and it is thought that this would likely be the case at the upper level. It is not felt that access to the upper level at the time of survey

would change the assessment of this building and the conclusion that it is of some limited heritage significance.



Photo 7 **Building L: interior view looking south-west, showing blocked opening**



Photo 18 **Building L: interior view looking north-east**

Buildings M and N

- 4.21. Buildings M and N both comprise a row of late 20th century garages. They are of rectangular planform and orientated on a north-east to south-west axis. They are constructed of modern blockwork walls, flat roof (likely timber) with corrugated metal covering, and timber batten and ledge garage doors with metal strap hinges (Photos 19 and Photo 20). They are modern structures of no heritage significance.



Photo 19 **Building M, looking south-west**



Photo 20 **Building N, looking south-east**

Conclusion

- Building A is a stone-built former open-sided cow shed which dates from the mid-late 19th century, and is considered to have some limited heritage significance.
- Building B is a small timber extension to Building C which dates from the mid-20th century and is of no heritage significance.
- Building C is a stone-built former farm building (possibly an animal shelter) which dates from the mid-late 19th century, and is considered to have some limited heritage significance.
- Building D is a small garage constructed in the late 20th century, and has no heritage significance.
- Building E is a metal storage container and has no heritage significance.
- Buildings F-I comprise various timber sheds and storage containers constructed in the late 20th or early 21st century and are of no heritage significance.
- Buildings J and K comprise a timber shed and stable constructed in the late 20th or early 21st century and are of no heritage significance.
- Building L is a stone-built former farm building (thought to be a stable) which was constructed in the late 18th or very early 19th century and is considered to have some limited heritage significance.

-
- Buildings M and N comprise two detached blocks of garages that were constructed in the late 20th century and are of no heritage significance.

Planning status of the extant Buildings and effects of their proposed demolition

- 4.22. The 20th and 21st century buildings on the Site, largely comprising garages, stables and storage containers, are not statutorily or locally listed and are not considered to hold any heritage significance. As such, they do not qualify as non-designated heritage assets and their demolition will not trigger paragraph 216 of the NPPF (2024).
- 4.23. There are three stone buildings on the Site which comprise a large part of the former Lower Bearfield farmstead range; these include Building A, the open-sided cow shed which dates from the mid-late 19th century; Building C, possibly a former cattle/animal shelter, which is of the same date; and Building L, which is of late 18th or very early 19th century date, and is probably a former stable building or earlier cattle shelter with hayloft over. All three buildings have undergone some alterations over the course of the 20th century, notably Buildings C and L, and all are currently in a poor condition. Considering the age and historic association with the former Lower Bearfield Farm, however, these buildings are considered to hold some limited heritage significance. Buildings C and L are proposed for demolition, while Building A will be retained within the Site but reduced in length by one bay.
- 4.24. Buildings A, C and L are not statutorily or locally listed. The Wiltshire Core Strategy local plan document (2015) did not identify any non-designated heritage assets as part of the plan-making process. Wiltshire Council also does not currently hold a published local list of non-designated heritage assets, and as such the buildings have not been previously identified as being non-designated heritage assets. Lower Bearfield Farm is recorded on the Wiltshire Historic Environment Record as a partially extant 19th century farmstead (ref: MWI68459).
- 4.25. As Wiltshire Council does not hold a local list of non-designated heritage assets, they do not have any published criteria by which a potential asset might be assessed against. As such, an brief assessment of Buildings A, C and L will be carried out below using criteria derived from a list of the commonly applied selection criteria, as set out by Historic England (2021) as well as those used in other similar assessments carried out by Cotswold Archaeology:

Criterion	Assessment
Historic value	Buildings A and C date from the mid-late 19th century, while Building L dates from the late 18th or very early 19th century. Survivals of farm buildings from the mid-late 19th century are common, and there are other such examples in the wider area. The survival of Building L is slightly more rare, which somewhat raises its inherent historic value in comparison to the other buildings. The buildings, as part of the former Lower Bearfield Farm, do not appear to have any notable or distinctive illustrative or associative qualities or connections. They also do not possess any particular intrinsic historic value in of themselves, examples of which Historic England gives in their Listed Selection Guide for Agricultural Buildings (2017b): "... examples of farmsteads which were associated new machinery or farming systems were pioneered or promoted, or where a clear connection can be proven with an improving landlord of interest. Where agricultural buildings are clearly dated (whether by datestone, documentation, or tree-ring dating) this is likely to add to their interest". In the aforementioned guidance, Historic England also includes 'former agricultural buildings in built-up settings' as a specific consideration for listing, stating: "survivals of farm buildings in built-up areas may have an extra claim to special interest on account of their rarity and eloquence as witnesses to a pre-urban past". In relation to considering whether these buildings qualify as non-designated heritage assets, this area is relevant. Lower Bearfield Farm was historically located in the Bearfield Area, a community that was located to the north of Bradford on Avon, surrounded by an agricultural landscape and largely separate from the main town. This area was extensively developed during the 20th century, and is now significantly built-up compared to its pre-20th century character. Historically there were two farmsteads in this area; Lower Bearfield and Upper Bearfield farms. The farm buildings at Upper Bearfield were demolished in the 20th century⁷, and only the farmhouse remains, making the survival of the Lower Bearfield buildings slightly more significant. The surviving buildings at the former Lower Bearfield Farm (although not representing the complete farmstead range) therefore help to illustrate the pre-urban, agricultural history of the surrounding area, which provides them with some local historic associative value. Overall, however, the buildings are considered to be of low historic value.
Architectural and artistic value	The three Buildings are rectangular, single-storey structures formed of limestone rubble walls with pantile roofs. They were constructed as farm buildings and as such have a very simple, rustic and utilitarian appearance which reflects their historically agrarian and rural character. They have a relatively common appearance and typology for buildings of this age, type and location. Many similar examples are seen in the area, and these examples are very plain with little to no architectural detailing, and they are not 'stand out' buildings architecturally or decoratively. Their principal elevations have also

⁷ <https://www.bradfordonavonmuseum.co.uk/upper-bearfield-farm>

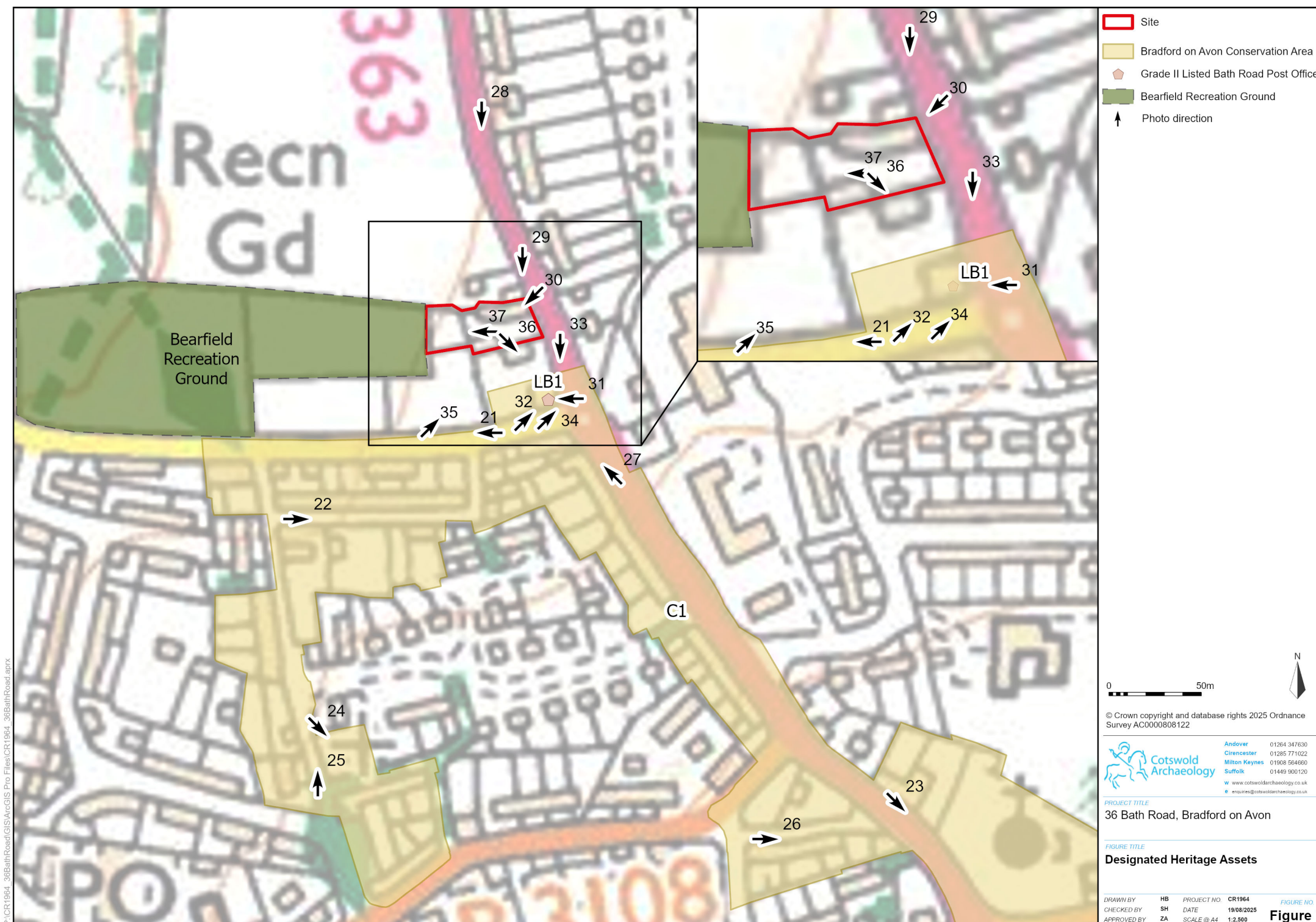
Criterion	Assessment
	been unsympathetically altered in the late 20th century, particularly in regards to Buildings C and L, which has somewhat eroded their historic appearance. The buildings are therefore considered to be of low aesthetic value.
Evidential/Archaeological value	Historic England (2021) describes this criterion as follows: “The local heritage asset may provide evidence about past human activity in the locality, which may be in the form of buried remains, but may also be revealed in the structure of buildings or in a designed landscape, for instance”. The Buildings are constructed of commonplace and readily available materials and in a time when much is known about building craft. There do not appear to be any surviving extant features/fixtures/fittings which relate to the Buildings’ former use. The Buildings have also been subject to alteration in the late 20th century, particularly Buildings C and L, which has further degraded their historic structure. It is therefore considered that the archaeological interest of the buildings, and any potential they hold to reveal evidence of past human activity, is negligible.
Communal value	There is a small amount of communal (social) value in the buildings, as part of the former Lower Bearfield Farm; the farm likely employed workers from the local community, and the remaining buildings somewhat reflect the former agricultural community and character of the local area, although to a limited degree.

Table 4.1 Assessment of the extant buildings against criteria for non-designated heritage asset status

4.26. Paragraph 039 of the Planning Policy Guidance (2019) states that “a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets”. From the evidence of the above assessment, and considering that the buildings are recorded on the Wiltshire HER as a historic farmstead, it is concluded that Buildings A, C and L are non-designated heritage assets of low overall significance. As such, the proposed scheme would result in the total loss of two non-designated heritage assets (Buildings C and L) and would trigger paragraph 216 of the NPPF (2024).

4.27. The extant buildings on the Site do not fall within the Bradford on Avon Conservation Area boundary, and as such they are not assessed within the Conservation Area appraisal for making a contribution to the special architectural or historic interest of the Conservation Area. The buildings do fall within the immediate setting of the Conservation Area, and their contribution to the Conservation Area through being a part of its setting, and any impact their removal would have upon the significance of

the Conservation Area, is discussed in the following chapter (Conservation Area Assessment).



- Site
- Bradford on Avon Conservation Area
- Grade II Listed Bath Road Post Office
- Bearfield Recreation Ground
- Photo direction



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PROJECT TITLE
36 Bath Road, Bradford on Avon

FIGURE TITLE
Designated Heritage Assets

DRAWN BY	HB	PROJECT NO.	CR1964	FIGURE NO.
CHECKED BY	SH	DATE	19/08/2025	Figure 7
APPROVED BY	ZA	SCALE @ A4	1:2,500	

5. THE SETTING OF HERITAGE ASSETS

- 5.1. This section considers potential non-physical effects upon the significance of susceptible heritage assets within the Site environs. Non-physical effects are those that derive from changes to the setting of heritage assets as a result of new development. All heritage assets included within the settings assessment are shown on Figure 7. Those assets identified as potentially susceptible to non-physical impact, and thus subject to more detailed assessment, are discussed in greater detail within the remainder of this section.

Step 1: Identification of heritage assets potentially affected

- 5.2. Step 1 of the Second Edition of Historic England's 2017 'Good Practice Advice in Planning: Note 3' (GPA3) is to 'identify which heritage assets and their settings are affected' (see Appendix 1). GPA3 notes that Step 1 should identify the heritage assets which are likely to be affected as a result of any change to their experience, as a result of the development proposal (GPA3, page 9).

- 5.3. A number of heritage assets were identified as part of Step 1, as potentially susceptible to impact as a result of changes to their setting. These assets have been identified using a combination of GIS analysis and field examination, which has considered, amongst other factors, the surrounding topographic and environmental conditions, built form, vegetation cover, and lines of sight, within the context of the assets' heritage significance.

- Bradford on Avon Conservation Area (**C1**, Fig. 7)
- Bath Road Post Office (Grade II; NHLE 1300968) (**LB1**, Fig. 7)

- 5.4. The Site visit, and study area walkover, identified that there would be no non-physical impact upon the significance of any other heritage assets as a result of changes to the use and/or appearance of the Site. As such, the proposals will not result in any non-physical harm to the significance of these assets, and they have not been assessed in any further detail.

Steps 2 – 3: Assessment of setting and potential effects of the development

- 5.5. This section presents the results of Steps 2 to 3 of the settings assessment, which have been undertaken with regard to those potentially susceptible heritage assets identified in Step 1. Step 2 considers the contribution that setting makes to the significance of potentially susceptible heritage assets. Step 3 then considers how, if

at all, and to what extent any anticipated changes to the setting of those assets, as a result of development within the Site, might affect their significance.

Bradford on Avon Conservation Area

- 5.6. The Bradford on Avon Conservation Area was first designated in January 1969 and was reviewed and extended in February 1984 and again in September 2006. A Conservation Area Appraisal and Management Plan was published by West Wiltshire District Council in March 2008 (hereafter referred to as the Appraisal). It is noted that the appraisal is 17 years old at the time of writing, and that there have been some changes to the Conservation Area in that time. It is not felt that this is significant enough to render the appraisal incorrect or outdated, and that it is still a fair representation of the Conservation Area, particularly the Bath Road and Bearfield Character Area which is the main focus of this assessment (see below).

Significance

- 5.7. This assessment focuses on the area of the Conservation Area that interacts with the Site directly. This part of the Conservation Area is identified as the Bath Road and Bearfield Character Area in the Appraisal.
- 5.8. The Bath Road and Bearfield area of Bradford on Avon is located high on the plateau on the northern outskirts of the town. This area shows the greatest variation in building dates and architectural styles, although the buildings are unified by their stone construction (Photo 21). The focal point of the area is Christ Church, which is located at the top of the hill on the main route out of the town centre.



Photo 21 View along Ashley Road, looking west



Photo 22 View of the Bearfield Buildings (on the left) with access path, looking east

- 5.9. The main use of the area is residential, and there is a strong ecclesiastical presence with Christ Church located at the southern end of Bath Road (Photo 23) and a number of smaller chapels within the residential area, such as the Bearfield Congregational Chapel (Photo 24). Some of the chapels are now converted to

residential use, such as the Providence Baptist's Chapel incorporated within the terrace known as Bearfield Buildings (Photo 22). Observation during the site visit noted a fair amount of bustle and activity, particularly in and around the junction of roads adjacent to Christ Church, with many of the local pedestrian routes being well-used. The areas around Bath Road (adjacent to the Site), Ashley Road and Huntingdon Street were noticeably quieter, although there was a steady stream of passing traffic on Bath Road Road/A363. There is little remaining evidence of industrial buildings related to the cloth trade in this part of the town, however there is a former mill in Sladesbrook (B3109) now converted for residential use.



Photo 23 **View of Christ Church and surrounding churchyard, looking south-east**



Photo 24 **Bearfield Congregational Chapel, looking south-east**



Photo 25 **View along Huntingdon Street, looking north**



Photo 26 **View along Winsley Road, looking south-east**

5.10. The key characteristics of this area are summarised as follows:

- Buildings laid out in a linear form either parallel or at right angles to the street (Photo 21).
- Building types are predominantly two and two and half storey terraces. The terraces tend not to be uniform and display a variety of architectural styles (Photo 21; Photo 26).
- Building materials are of stone (ashlar, rubble stone, coursed/coursed and squared); roofs of stone tiles, red clay pantiles and to a lesser extent slate; wooden sash and casement windows; stone mullion window fitted with wooden casement windows, and wooden panel doors with simple fanlight above (Photo 26).
- Landscape features include trees in the vicinity of Christ Church and Bath Road; private gardens; **views of the open countryside from within the settlement** (emphasis West Wiltshire Council)
- Streetscape features include high and low limestone boundary walls, on-street parking and small groups of garages (Photo 21; Photo 25).
- Skyline includes the spire of Christchurch which features locally and in longer distant views of the town.

- 5.11. With specific reference to the setting of the Conservation Area, the Appraisal notes that ‘the character of the town clearly does not stop at the Conservation Area boundary and this is especially evident from the open area to the south and west, and northwards along the Bath Road’ (West Wiltshire Council 2008).
- 5.12. The physical surrounds of the Bath Road and Bearfield Character Area are varied due to its location towards the north end of the town, in the area where the settlement transitions into open countryside. To the south of the Character Area lies the centre of Bradford on Avon, which is part of the Conservation Area. The definition, scale and grain of this area is characterised by narrow winding roads and dense development, where the buildings closely follow road lines and consequently present an ever-changing view along these routes. This area has been physically and visually shaped by the presence of the river Avon, which provides relief from the high density historic development of the town, and the presence of open spaces such as Westbury House Gardens help to enhance the setting of the river. The architecture is primarily a mixture of 17th, 18th and 19th century buildings, and because historic uses have dictated building design, there are a wide range of different building types ranging from residential town houses (terraces, groups of buildings or one-off individual buildings of distinct quality), to ecclesiastical, community, retail and industrial structures, which are visually connected by the common use of bath stone in their construction.
- 5.13. To the east and south-east of the Bath Road and Bearfield Character Area lies the eastern part of Bradford on Avon, which until the mid-20th century was almost entirely comprised of undeveloped agricultural land and was developed over the course of the mid-late 20th century. This area is primarily residential in character, with modern buildings that are generally of a two-storey domestic scale and often utilise stone in their building materials. There is a notable use of traditional boundary treatments to roads and plots, such as Cotswold stone boundary walls, and this area has also retained many trees.
- 5.14. To the south-west and west of the Bath Road and Bearfield Character Area lies the western part of Bradford on Avon town, which was, like the eastern side, almost entirely comprised of agricultural land and small areas of historic settlement until the mid-20th century. This area was also extensively developed over the course of the mid-late 20th century and is largely residential in character, sharing many of the same

characteristics as the eastern area detailed above, and punctuated by the campus of St Laurence School, with its playing fields and large building complex.

- 5.15. The setting to the north-east of the Character Area is also largely comprised of mid-late 20th century residential development. Until the early 20th century, the area to the east of Bath Road and north-west of Sladesbrook was predominately comprised of the gardens and ground around Berryfield House, a country house of early-mid 19th century date. Like other parts of the town, this area was gradually developed and built over with residential houses, and extended to the north and north-east into the formerly rural setting of the town.
- 5.16. The setting to the north-east is the only part of the northern Conservation Area which has retained its rural and agricultural character. The part of the Conservation Area around Bath Road and Ashley Road is still directly connected to and surrounded by this open rural landscape to the north. This area is comprised of smaller paddocks and the Bearfield recreation area, beyond which is a mostly agricultural landscape with a mixture of arable and pasture, stretching away to the north and north-west.
- 5.17. Removal of some smaller field boundaries over the course of the 19th and 20th centuries to allow for larger fields suitable for modern agricultural activity has eroded a little of the authenticity of the historic landscape in this area, however the surrounding landscape still retains a firmly rural and agricultural character. This rural setting makes an important contribution to the significance of the Conservation Area, particularly as much of the rural landscape which historically surrounded the present-day Conservation Area has been lost to 20th century development.

Experience – ‘What Matters and Why’

- 5.18. In terms of experience, the setting of the Conservation Area beyond Bath Road and Ashley Road is one more typical of a semi-rural residential settlement. Ashley Road and the surrounding roads to the south, as well as the settlement area to the east of Bath Road, were noted to be relatively quiet with far less bustle and activity than in the area around Christ Church, with less frequent traffic observed. Bath Road in contrast is relatively busy, with pedestrians regularly using the route to access the town centre, and the fairly constant stream of traffic, the noise of which intrudes upon the experience of this area, which historically would have been a little more quiet.
- 5.19. In regards to the Bath Road and Bearfield area, the Appraisal highlights that “to the north of Ashley Road, the smaller paddocks and recreation ground fronting the road,

together with the parkland landscape associated with Frankleigh House, contributes to the setting of this part of the Conservation Area, giving it a rural character". This area directly abuts the Site and views towards this land looking north east from Ashley Road include the Site. The rural landscape character of the recreation ground, paddocks and parkland to the north therefore make a contribution to the significance of this part of the Conservation Area. Elsewhere, the Appraisal also notes that 'the *rural setting* of Bradford on Avon features strongly in many panoramic views from the town centre and *contributes significantly to the setting*' (emphasis added), and the Bearfield and Ashley Road area is noted as directly abutting the countryside setting.

5.20. Under Chapter 6, Visual Assessment, the Appraisal includes a list of views which are considered to be of 'prime importance'. One of these views relates to the Bath Road and Bearfield Character Area:

- Views from the edges of the Bearfield and Woolley areas to the amenity parkland and rural landscapes beyond (p.23, West Wiltshire Council)

5.21. The Appraisal does not specifically list key views within the Character Area beyond the one above, nor does it depict them on a map. In the Bath Road and Bearfield Character Area description, the Appraisal highlights 'views of the open countryside from within the settlement' as a landscape feature (p.76, West Wiltshire Council, 2008). Under 'Landscape', it also states that 'the location on the edge of town allows views through to the open countryside, notably from Sladesbrook, New Road and Whitehill' (p.76, 2008). The western edge of the Site is visible on the periphery of views looking northwards from Ashley Road look northwards towards the Bearfield recreation ground and paddocks, as well as the rear of the plots and boundary treatments to 35 and 36 Bath Road (Photo 35). These views fall under those of 'prime importance' as outlined in paragraph 5.20, and therefore the Site is considered to at least partially fall within this key view.

5.22. Views looking north along Bath Road are more linear and channelled by the presence of tall mature trees to the road boundaries (Photo 27), however there are glimpsed views towards fields to the north-west (where grazing cows were observed) and the green and leafy surrounds of Bath Road marks the transition into the rural countryside outside of the settlement edge. These views as outlined above provide an important experience from within the Conservation Area, as they aid in understanding and appreciating the rural origins of the Bearfield area which until the mid-late 20th

century was essentially a distinct rural settlement to the north-west of Bradford on Avon proper.

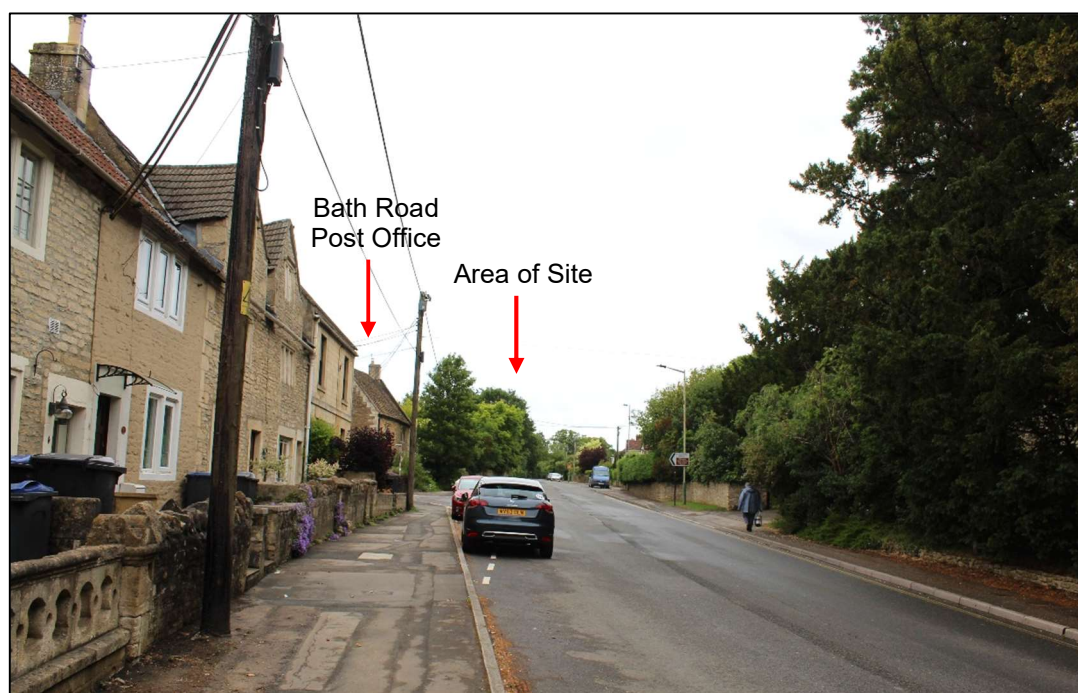


Photo 27 View from within the Conservation Area, looking north along Bath Road towards the Site



Photo 28 View of the approach towards the Conservation Area along Bath Road, looking south-east

- 5.23. The views along the approach from Bath Road also make an important contribution towards the experience of the Conservation Area. The experience of travelling into the Conservation Area from this direction begins within the wider rural landscape, where the abundance of trees along the road allows for glimpsed views of fields and grazing animals beyond. The views along the approach are largely linear, being funnelled by the trees to the road boundary, but nonetheless allow for an appreciation of the rural character of the landscape surrounding the Conservation Area (Photo 28). The mid-20th century houses along the east side of Bath Road mark the transition into the former 'Bearfield' residential area, which has been significantly developed in the past century (Photo 28). The Site features in these views when approaching the Conservation Area from the north (Photo 29).
- 5.24. The 19th century cow shed directly addresses Bath Road, and is perceivable from longer distance views (c. 40m away) when travelling south along the road (Photo 29, Photo 30); as one approaches and moves past the Site, the opening of the entrance allows for views towards the other 19th century buildings and an appreciation of the form and layout of the former farmstead group (Photo 30 and Photo 1). These views facilitate a deeper understanding of the rural farming history of this part of the Conservation Area and the Site marks the physical transition point from the rural setting into the northern settlement boundary of the Conservation Area.



Photo 29 View of the approach towards the Conservation Area along Bath Road, looking south-east, with the Site on the right

- 5.25. Despite the Site not forming part of the Conservation Area, there is also a view from within the Conservation Area on Ashley Road looking north-east which directs the viewer across the Site. From this point, views encompass the western extent of the Site where low and open boundary treatments allow for an appreciation of the 19th century farmstead group (with the exception of the cow shed, which is obscured from this direction). The Bath Road Post Office is also partially visible within the view, allowing for at least some appreciation of its former historical function as the farmhouse of Lower Bearfield Farm. The adjoining paddock and recreation ground beyond can also be seen from this viewpoint which provides an appreciation of the countryside setting of the Conservation Area without the interruption of built form.



Photo 30 View of the Site from Bath Road when approaching the Conservation Area boundary, with Building A in the foreground

- 5.26. There is also a view from within the far western extent of the Site towards the buildings along Ashley Road within the Conservation Area. This view largely looks towards the rear plots of the Bearfield Buildings, however, and as such does not provide an appreciation of the more important parts of the Conservation Area, such as the houses with north-facing elevations addressing the street. As such, the view does not contribute to the significance of the Conservation Area. The Site is largely obscured in views from the Conservation Area boundary on Bath Road when looking

north due to the alignment of the road and the intervening form of trees and boundary treatments (Photo 27).

Contribution of the Site to the significance of the Conservation Area

- 5.27. The Site lies c. 30m to the north-west of the Conservation Area boundary and forms part of its immediate rural setting. The Site comprises part of the historic former farmstead of Lower Bearfield Farm, with the surviving 19th century buildings (though somewhat altered and in a poor state of repair) representing the majority of the former farmstead range. The principal contribution of the Site to the significance of the Conservation Area is as an appreciable part of the immediate agricultural surroundings of the Conservation Area, whose presence speaks to the important history of farming in and around the historic Bearfield area of Bradford on Avon.
- 5.28. The Site features in views both from the Conservation Area looking out to its setting, and in views on approach from the north along Bath Road, where it marks the transition point from the rural setting into the residential settlement area, and where the cow shed makes a positive contribution to the semi-rural streetscape.

Bath Road Post Office, Grade II Listed

- 5.29. The Grade II Listed Bath Road Post Office (35 Bath Road) is located c. 50m to the north-east of the Site (Photo 2; Fig. 7). White Cottage was Listed on 26 April 1985 and the Listing description describes the Building as:

"C17. 2 storeys. Rubble with ashlar quoins, stone tiled roof. 2 windows, casements with stone mullions and dripmoulds. First floor has one 3-light and ground floor one 4-light window. Plain door with wooden porch".

- 5.30. The significance of 35 Bath Road primarily derives from its historic, evidential, and aesthetic values as being a good representation of a modest stone-built vernacular house and former farmhouse on the outskirts of Bradford on Avon, constructed in the 17th century from local materials. 35 Bath Road is the former farmhouse of Lower Bearfield Farm (which included the Site), and as such is illustrative of and associated with local farms and farming practices in Bradford on Avon. Its evidential value, which substantially contributes to its significance, derives from the tangible physical remains and historic fabric of the 17th century farmhouse. When the farm ceased to exist, part of the building became the Bath Road sub-post office until the 1990's (when it closed

after an armed robbery⁸), and as such also has some communal value for the role it played in the local community in the mid-late 20th century.



Photo 31 Bath Road Post Office: principal elevation as viewed from Bath Road

Physical Surrounds – ‘What Matters and Why’

Aspect and orientation

- 5.31. 35 Bath Road is located towards the northern edge of Bradford on Avon. It is aligned on an east to west axis with its front (east) elevation directly addressing Bath Road (Photo 31). Bath Road (the A363) was laid out as part of the Bradford Turnpike Trust in the 1790's as a road to Bath, before which there was possibly a more minor road in the same location which is the main thoroughfare connecting the north side of the settlement to the town centre (Photo 28). The Listed Building has been physically bordered by these roads since at least the late 18th century, and it is prominent and visible from the streetscape and acts as a focal point at the junction between the two roads. This orientation and aspect makes a positive contribution to its significance.

Green space, trees and vegetation

- 5.32. 35 Bath Road is situated in the south-east corner of a rectangular enclosed garden plot with an abundance of mature trees, shrubs and hedges to the borders of the plot (Photo 32). Historic mapping illustrates that these gardens have surrounded the

⁸ <https://www.bradfordonavonmuseum.co.uk/bath-road>

house since at least the time of the 1840's Wiltshire Tithe mapping (not reproduced; available at Know Your Place) although the present plot is smaller than the historic plot having lost some land to the north, possibly when the Listed Building was separated from its farmstead, which has altered the legibility of the historic plot. Nonetheless, the green space and vegetation of the garden plot forms the asset's immediate setting and is the most crucial aspect to understanding its historical function as a semi-rural dwelling. Additionally, there is small enclosed front garden area with a mature tree and vegetation which creates a slight separation of the public area of the road and the privacy of the residential area beyond. These features make a positive contribution to the significance of the asset.



Photo 32 View towards Bath Road Post Office's rear elevation and garden, as view from Ashley Road

- 5.33. The Listed Building's garden is bordered to the west by an area of green space which includes an enclosed paddock belonging to the owners of 36 Bath Road, and the Bearfield recreation ground⁹ which has an abundance of vegetation and mature trees to its borders. The entirety of this area comprises a rectangular plot which appears on historic mapping from the time of the 1840s, and was historically part of the farm (see paragraph 3.11). Although it is no longer in agricultural use and has been

⁹ <https://bradfordonavontowncouncil.gov.uk/your-community/places-and-spaces/parks-green-spaces/bearfield/>

internally subdivided, the outer boundaries of the plot as seen on historic mapping are still legible, and this area still has a physical proximity to the Listed Building. Although 35 Bath Road is no longer in use as a farmhouse, the historic and functional links to this area of green space aid in understanding the Listed Building's special interest, and therefore makes a significant positive contribution to the significance of the Building.

Definition, scale and 'grain' of surrounding streetscape

- 5.34. The built grain of the immediate physical surroundings of 35 Bath Road is characterised by a pattern of largely continuous development along Bath Road and Ashley Road, with a mixture of terraced and detached buildings of predominantly two-two and a half storeys in height. The buildings typically address the roadside with small front gardens, although some are set back behind larger garden plots. The surrounding buildings vary in age, although are predominately traditional buildings of pre-20th century date, and incorporate a palette of traditional building materials such as limestone rubble and stone roof tiles, which creates a recognisable uniformity typical of the local region. These features of definition, scale and grain of the surrounding streetscape contribute positively both to the aesthetic interest and the historical understanding of 35 Bath Road and make a positive contribution to the asset's significance. There is some modern development such as the mid-20th century houses on the east side of Bath Road, which lie opposite the Listed Building. While they do not incorporate the same traditional material palette, such development respects the domestic scale of the area and is of neutral element of the Listed Building's setting.

Functional relationships and communications

- 5.35. 35 Bath Road was formerly the farmhouse of Lower Bearfield Farm. The farm historically incorporated the plot of 35 Bath Road as well as the plot at 36 Bath Road and part of the plot of 37 and 39 Road, where the farmstead range was located to the north of the farmhouse. There are three surviving 19th century farm buildings at 36 Bath Road, one of which dates from the early 19th century (and may be slightly older in date), and one surviving 19th century building at 37 and 39 Bath Road which now hosts the Manu healthcare centre. These four surviving buildings appear on the 1840's Wiltshire Tithe mapping (not reproduced; available at know Your Place) and the 1st Edition Ordnance survey map (Fig. 2) and represent the entirety of the historic farmstead at that date.

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- 5.36. Although some elements of the historic farm range have been lost and the buildings at 36 and 37-39 Bath Road have been altered over time, they have retained their historic layout and comprise the majority of the historic farm range at Lower Bear Farm. The addition of the modern 20th and 21st century garages and outbuildings at 36 Bath Road has somewhat eroded the historic form and appearance of the farm range. Additionally, the modern house at 36 Bath Road was constructed to the north of 35 Bath Road which has severed the physical and visual relationship between the former farmhouse and its farmstead. That said, the continuing presence of these buildings aids in understanding the historical functional associations of the Bath Road Post Office, and they make a positive contribution to its significance.

Experience – ‘What Matters and Why’

- 5.37. It was not possible to access the immediate setting of the Building due to it being a private property, however it is possible to gain an understanding of its experience through aerial images and from viewing the property from public areas.

Sense of enclosure, seclusion, intimacy or privacy

- 5.38. The best appreciation of the aesthetic, evidential and historical values of the Listed Building are likely to be gained through the immediate views from within the gardens which surround the asset. The gardens include the original plot associated with the asset, which is documented on the 1840 Tithe map, when the asset was described as a farmhouse, garden, and homestead. The plot was increased in size during the mid-20th century with an extension of land on the east side but otherwise the historic plot remains legible and facilitates an historic and authentic experience of the asset. As a dwelling which is set back from the road and surrounded by its own private gardens, the primary experience of being within the setting of the listed asset will be one of quiet seclusion where the sounds, sights, and smells of nature within the surrounding gardens can be appreciated.

Views from, towards, through, across and including the asset

- 5.39. The views of the Listed Building from within the enclosed gardens, where the aesthetic, evidential and historical values of the Building can be best appreciated and understood, make an important contribution to significance. The views of the Listed Building from the adjacent roads also make a positive contribution to significance; these include the views towards the Building from Bath Road, where its principal elevation is clearly visible, as well as the immediate views from the junction of Ashley and Bath Roads towards its south-east elevation (Photo 34). These views allow for

an appreciation of the Listed Building's aesthetic and historic values, and where its relationship with the surrounding area can be understood and appreciated.

- 5.40. The longer distance views towards the Listed Building from Ashley Road allow for an appreciation of both the Listed Building's former relationship to the surviving elements of the Lower Bearfield Farmstead (the current Site), as well as the adjacent area of green open space to the west which has historic and functional links to the Listed Building. These views also make a contribution to significance, although to a lesser degree than those outlined above.
- 5.41. Due to intervening trees and boundary treatments, the Listed Building is almost entirely screened from longer-distance views to the north of Bath Road (Photo 33), but is visible from the south where it forms an important part of the streetscape.
- 5.42. The views looking outwards from the Building which make a positive, if limited contribution to significance are those towards its enclosed rear garden plot, where the sense of enclosure and relationship between the Building and its grounds can be appreciated, and the views from the north-west elevation, which take in the asset's close physical and spatial relationship to Bath Road and Ashley Road.



Photo 33
west

View of Bath Road Post Office from the north on Bath Road, looking south-



Photo 34 View of Bath Road Post Office from Ashley Road, looking north-east

Surrounding landscape character

- 5.43. The Listed Building is surrounded to the south, east and north-east by the settlement area of the north end of Bradford on Avon. This area is predominantly residential in character, comprised of both historic buildings and more modern houses, as a result of the gradual and unplanned development of this area over time. The Listed Building is surrounded by green and open land to the west and north-west, including the Bearfield recreation ground, beyond which is a rural landscape comprised of agricultural fields, areas of woodland and small scattered settlements. The area in which the Listed Building is located marks the transition from the settlement of Bradford on Avon into its surrounding rural setting, and this wider setting makes a broadly positive contribution to the Building's significance.

Contribution of the Site to the significance of the Listed Building

- 5.44. The Site is located c. 35m to the north-west of the Listed Building, with the house at 36 Bath Road lying inbetween, and forms part of the surrounding landscape setting of the asset which, as discussed above, makes a broadly positive contribution to the its significance of the asset. The Bath Road Post Office was formerly a farmhouse as part of Lower Bearfield Farm, until the farm was closed in the mid-20th century. The Site comprises part of the historic Lower Bearfield farmstead, including the former

farm buildings and farmyard, with which the Listed Building has historical functional associations.

- 5.45. Despite the close proximity of the Site to Bath Road Post Office, however, the construction of the modern house at 36 Bath Road has diminished the historic physical, spatial and visual relationships between the farmhouse and its former farmstead. Views towards the Listed Building from within the Site are now obscured by 36 Bath Road and the trees within its gardens (Photo 36). The Listed Building and the farm buildings are also not appreciable as a historic group in views from Bath Road, where either the former farmhouse is obscured (from the north) or the former farmstead is not visible (from the south). There is some appreciation of the former farmstead group from Ashley Road, where both the Listed Building and the former farm buildings are partially visible in views looking east (Photo 35) along with the adjacent field which probably also belonged to Lower Bearfield Farm.
- 5.46. These changes have limited the contribution that the Site makes to significance, however it still remains an appreciable part of the physical surrounds of the Listed Building in its setting between the settlement of Bradford on Avon and the rural land to the north, and makes a positive (if limited) contribution to its significance.



Photo 35
east

View of the Site and Bath Road Post Office from Ashley Road, looking north-



Photo 36 **View towards Bath Road Post Office from the Site, looking south-east**

6. DEVELOPEMENT EFFECTS

Description of the proposals

- 6.1. The proposed development comprises the demolition of all but one of the extant buildings on the Site, and the construction of two self-build residential dwellings, along with associated landscaping. All of the former farm buildings associated with Lower Bearfield Farm will be demolished, with the exception of Building A (the open-sided cow shed) along with the 20th/21st century garages and sheds. Building A will also be altered to removed one bay at the east end, where the building currently directly addresses Bath Road.
- 6.2. The proposed new dwellings will be two storeys in height, with principal elevations facing north-east towards the access on Bath Road. They will be constructed of traditional Cotswold stone with gabled roof structures covered in pantiles, and will feature design elements such as dormer windows, dressed stone window surrounds and cills, and glazed entrances sheltered by overhanging canopies. Each dwelling will have its own private garden to the rear (west) and parking to the front (east); Plot 1 will have a detached stone store to the front, and Plot 2 will have an attached stone garage to the front. Scheme drawings and visuals submitted with the application should be reviewed in conjunction with this assessment.

Effects on the significance of the extant buildings

- 6.3. Buildings A, C and L have been identified as non-designated heritage assets of low overall significance.
- 6.4. The proposed demolition of Buildings C and L will result in the complete loss of these non-designated heritage assets. This will trigger paragraph 216 of the NPPF (2024), and this loss will need to be weighed against the public benefits of the proposed development.
- 6.5. The proposed scheme also includes the repair and alteration of Building A for use as additional garage/storage space for the two new dwellings, and the occupiers of the house at 36 Bath Road. This building is currently in a poor state of repair, and has no secured long term use. The proposals will involve the removal of one bay, to allow for boundary alterations to accommodate the visibility splay. This will slightly alter its historic planform and appearance, however the overall appearance and historic character of the building will be preserved. The scheme will ensure the building's conservation and secure a viable use for the building, which will ensure is

preservation. On balance, it is concluded that the proposals will not harm the significance of this non-designated heritage asset, and will be beneficial to its long-term conservation.

Effect on the significance of Bath Road Post Office

Demolition and alteration of the existing buildings

- 6.6. As previously established, the Site makes a broadly positive, if limited contribution to the significance of the Listed Building due to the presence of the surviving former farm buildings with which the former farmhouse has a historic and functional relationship. Although these buildings have been altered and have lost their historic usage, they have largely retained their historic layout and comprise the majority of the historic farm range of Lower Bearfield Farm. Changes to the Listed Building's setting from encroaching residential development, including the house at 36 Bath Road, has diminished both the relationship with its former farmstead and the ability to 'read' and understand the Listed Building as a former farmhouse. However, they remain a part of the Listed Building's physical surrounds, and although the Site is mostly hidden from views towards the Listed Building on Bath Road, part of the historic farm range (Buildings C and L) is visible in views towards the Building from Ashley Road (Photo 35) which allows for some appreciation and understanding of the former relationship between the two.
- 6.7. Demolition of all but one of the former buildings would effect a change to the physical surrounds of the Listed Building and alter the view towards the asset from Ashley Road, which would slightly alter the perception and understanding of the building as a former farmhouse. This would result in a loss of historical and functional associations between the former farmhouse and its former ancillary farm buildings, which have already been degraded by modern development. It is noted that the retention of Building A would slightly mitigate this impact, although the historic layout of the farmstead would no longer be legible 'on the ground', and the relative completeness of the range would be lost. The proposed development would therefore have a limited negative impact on the heritage values of the building, which will result in a very small level of **less than substantial harm** to its significance and should be considered under paragraph 215 of the NPPF 2024. The modern garages and structures on Site (Buildings B, D-K, and M and N) make no contribution to the significance of the Listed Building, and their demolition will cause no harm to the significance of the Building.

Effects of the proposed new dwellings on significance

- 6.8. As discussed above, the Site makes a positive, if limited contribution to the significance of the Listed Building due to the presence of the surviving farm buildings. Following removal of the buildings (excluding Building A), the Site would remain a part of the physical surrounds of the Listed Building but would be considered to be of neutral contribution. As evidenced in Paragraph 5.45, any experience of the Listed Building from within the Site is essentially non-existent due to the house at 36 Bath Road and intervening boundary screening, and the orientation of the Building is to the east, rather than northwards towards the Site.
- 6.9. As seen in the scheme designs accompanying the planning application, the proposed new dwellings will be set back from Bath Road and sited c. 43m to the north-west of the Listed Building. The new dwellings will be two storeys in height, and are of a contemporary design which will utilise local building materials. They have been sensitively designed and their form, scale and materials reflect the grain and palette of their surroundings (see paragraph 6.2 for a description of the proposed dwellings, along with scheme drawings), utilising gabled roof forms and traditional Cotswold stone walling.
- 6.10. As discussed above, the new dwellings will not be visible in views from the Listed Building due to the intervening form of 36 Bath Road. Due to their set-back position, they will also not be visible in views towards the Listed Building from Bath Road. Although the access to the Site from Bath Road will be altered, the traditional boundary walls will be retained or reinstated, along with some vegetation screening. As such, the Listed Building's place in the streetscape of Bath Road will be unaffected.
- 6.11. The proposed dwellings will be visible in views towards the Listed Building from Ashley Road. However, they will be situated in the background and at least partially screened by boundary treatments to the garden plots. The proposed dwellings will not affect the relationship between the Listed Building and the adjacent green space of the neighbouring field, nor will they visually compete with the Listed Building. The proposed scheme will effect a change to this view, but not one which will negatively affect the experience of the Listed Building.

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- 6.12. It is concluded that the proposed new buildings will not alter the setting of the asset in a way which would negatively affect its significance or the experience and understanding of its special interest, and therefore will cause **no harm** to significance.

Effect on the significance of Bradford on Avon Conservation Area

- 6.13. The Site is located c. 30m north of the Conservation Area boundary. As such, the Site represents a component of its setting and lies within views both into and out from the Conservation Area.

Demolition of the existing buildings and alteration of Building A

- 6.14. The proposed demolition of the existing buildings (with the exception of Building A, the open-sided cow shed) would alter the character of the Site from one that, while presently in mixed use, still appears semi-agricultural in character due to the presence of the former farm buildings, to a residential development. This would effect a change to part of the historical agricultural surroundings of the Conservation Area through the removal of a group of buildings that maintain a semblance of the historic Lower Bearfield Farm. As has been evidenced above, the present contribution of the Site is positive, although somewhat limited by the alterations and modern additions within the Site, and the construction of a modern house at 36 Bath Road which separated the farmstead from its former farmhouse (Bath Road Post Office).
- 6.15. The proposed demolition would also alter the views from the Conservation Area towards its rural setting, specifically from Ashley Road looking north-east (Photo 35), which have been identified as being of 'prime importance' in the Conservation Area Appraisal (p.23, West Wiltshire Council). These views include a clear visualisation of the former farm buildings, particularly Buildings C and L, allowing for an appreciation of the rural history of this part of the Conservation Area.
- 6.16. The approach towards the Conservation Area from Bath Road is also considered to be important to the experience of the Conservation Area, as discussed in paragraph 5.23. The views and experiences when approaching the Conservation Area from the north along Bath Road would also be altered by the removal of these buildings. It should be noted, however, that Building A is the most visually prominent building within these views, as it directly addresses Bath Road while the other former farm buildings are set back within the Site. Building A contributes positively to the streetscape and is the main visual indicator of the area's historical functional associations when approaching from this direction. Building A is proposed to be

repaired and retained, and one bay on the east end will be removed, which will minimise the changes to this important view towards the Conservation Area and help to preserve the character of the historic approach.

- 6.17. In summary, Buildings A, C and L contribute to the understanding and significance of Bradford on Avon as a rural town, and comprise part of a former farming enclave with a historic street presence (albeit with a deteriorated appearance) on Bath Road, which will be almost entirely removed with the propose scheme. The proposed development would alter the physical surrounds of the Conservation Area via the removal of a range of buildings that presently contribute to the historical agricultural setting of the area. The proposals will also result in a change in use of the Site from ancillary, formerly agricultural use to a domestic enclave. These changes will slightly impact the ability to understand and appreciate the historical functional associations and character of the Conservation Area's northern boundary. This would be manifested through changes to views both from the northern boundary of the Conservation Area and views towards the Conservation Area on approach along Bath Road, where presently the Site is visible. The degree of this impact is very limited, particularly with the retention of the cattle shed within the streetscape of Bath Road, and as such there would be a very small measure of **less than substantial harm** (lower end) to the significance of the Conservation Area.

Effects of the proposed new dwellings and retention of Building A on significance

- 6.18. The two proposed new dwellings will be sited within the west part of the Site, with one situated approximately within the north-west corner and one in the south-west corner. The dwellings will be set back c. 40m from the boundary of Bath Road (Photo 37), and the current site access will be relocated slightly further south than where it is presently sited to suit new visibility splays and increase access safety. The Site is located outside of the Conservation Area, and therefore the key issue is how the proposed scheme will affect those elements of setting which make a positive contribution to the Conservation Area.
- 6.19. The new dwellings have been sensitively designed and their form, scale and materials reflect the grain and palette of their surroundings, utilising gabled roof forms and traditional Cotswold stone walling. The architectural designs therefore complement and reference the local vernacular and allow the new dwellings to positively integrate into the residential character of the setting of the Conservation Area. Hard and soft landscaping has also been designed to reflect the surroundings

of the Site, with lawned rear gardens to each dwelling and additional grassed areas adjacent to the access driveway. Boundary treatments within the Site will utilise traditional stone walling and hedges, along with the retention of existing trees and shrubs. The current Site has an extensive area of hardstanding, along with modern garages, which is visible in views when approaching the Conservation Area. The proposed scheme will retain some areas to the east of the Site in order to provide car parking spaces for the dwellings, but will reduce the overall area of hard landscaping. Planting of privet hedges will also soften the car parking areas. The proposed Site plan and landscaping designs therefore assimilate well with the existing Site and the prevailing tree-lined and green character of the local area.



Photo 37 View towards the proposed location of the new dwellings from within the Site, looking north-west

- 6.20. The proposed dwellings will be visible in views from within the Conservation Area when looking north towards the wider rural setting. Although removal of the extant former farm buildings will change these views in a way which will cause a small amount of harm to the significance of the Conservation Area (see Paragraph 6.11), the new dwellings in themselves will not obscure or dominate these views and will assimilate well within the existing surroundings.
- 6.21. The approaching views towards the Conservation Area from Bath Road, as discussed above, make an important contribution to significance for the ways in which they allow

an appreciation and understanding of the connection between the Conservation Area and its rural setting. The Site is an important part of that view, with the surviving farm buildings providing evidence of the area's agricultural past, and marking the transition point from the wider setting into the Conservation Area itself.

- 6.22. The proposed dwellings will be set back far within the Site and will only be partially visible in views from Bath Road, and will not affect the views or experience of the approach into the Conservation Area. The proposed scheme will involve some alterations to the boundary treatments along Bath Road. This will include the partial demolition and rebuilding of one section of wall; alteration to heights of the traditional stone walls as well as extension of existing walls further into the Site, and planting of a hedge to the north side of the boundary. These boundary treatments are characteristic of the Conservation area, and although they will be slightly altered, the overall rubblestone wall character will be maintained and will not impact the experience of the approach towards the Conservation Area.
- 6.23. Building A, the open-sided former cow shed, lies directly adjacent to Bath Road. Of all the extant buildings on Site, this structure makes the most significant contribution to the streetscape of Bath Road and is the most important component of the Site in views on approach towards the Conservation Area. Building A will be reduced in length by one bay, slightly pulling it back from the building line of Bath Road, and an additional boundary hedge will be added between the Building and the boundary wall. This will slightly alter the appearance of the building when viewed on approach towards the Conservation Area. However, the building will still be visible and its agricultural character still legible, and its retention will help to maintain the existing street scene and ensure that the agricultural history of the area is still partially able to be understood.
- 6.24. The scheme designs have therefore been found to be sensitive, high quality, appropriately proportioned and complementary to the local context, meaning that the new buildings will not bring any harm to the character and appearance of the Conservation Area. As such, from this aspect of the proposals (the new buildings) the scheme complies with local policy and the NPPF 2024.

Summary of development effects

Demolition and alteration of extant buildings

Impact on non-designated heritage assets

- The late 20th and 21st century buildings on site are not statutorily or locally listed and are not considered to hold any heritage significance. As such, they do not qualify as non-designated heritage assets and their demolition will not trigger paragraph 216 of the NPPF (2024).
- Buildings A, C and L have been identified as non-designated heritage assets of low overall significance. The demolition of Buildings C and L will result in the total loss of these non-designated heritage assets and will trigger paragraph 216 of the NPPF (2024); this loss will need to be weighed against the public benefits of the proposed development.
- The proposed scheme will include the alteration and repair of Building A. This building is currently in a poor state of repair, and has no secured long term use. The proposals will involve the removal of one bay, which will slightly alter its historic planform and appearance, although the overall historic character will be preserved. The scheme will ensure the building's preservation and secure a viable use, and therefore overall the proposals will cause no harm to the non-designated heritage asset.

Impact on designated heritage assets

- Buildings A and C, as part of the former Lower Bearfield Farm complex, are considered to make positive (limited) contribution to the significance of both the Grade II Listed Bath Road Post Office and Bradford on Avon Conservation Area, which lay beyond the Site boundary. The loss of Buildings C and L will result in a small level of less than substantial harm (lower end) to both the Grade II Listed Bath Road Post Office and the Bradford on Avon Conservation Area, and will need to be weighed against the public benefits of the proposed development.

Proposed new dwellings

Impact on designated heritage assets

- In regards to Bath Road Post Office, it is concluded that the proposed new buildings will not alter the setting of the asset in a way which would negatively affect its significance or the experience and understanding of its special interest, and therefore will cause no harm to significance.

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- In regards to Bradford on Avon Conservation area, it is concluded that the proposed new buildings will not bring any harm to the character and appearance of the Conservation Area, and that the scheme complies with local policy and the NPPF 2024.

7. CONCLUSIONS

- 7.1. In May 2025 Cotswold Archaeology was commissioned by Crossman Homes Ltd to undertake a Heritage Assessment in respect of a proposed scheme at 36 Bath Road, Bradford on Avon, Wiltshire. The assessment is required to inform decision making in relation to a proposed scheme for the demolition of some of the existing buildings on the Site, and for the construction of two self-build homes. The Site lies at the north edge of Bradford on Avon, close to the boundary of Bradford on Avon Conservation Area and adjacent to a Grade II Listed Building, 35 Bath Road.
- 7.2. A building assessment has been undertaken which has examined the extant buildings within the Site. This assessment concluded that Buildings A, C and L are considered to be non-designated heritage assets of low overall significance. The demolition of Buildings C and L will result in the total loss of these non-designated heritage assets and will trigger paragraph 216 of the NPPF (2024); this loss will need to be weighed against the public benefits of the proposed development. It is considered that the proposed repair and alteration of Building A will preserve its overall historic character and help secure its long-term viable use, and the proposals will cause no harm to the non-designated heritage asset.
- 7.3. A staged settings assessment was also undertaken, in accordance with Historic England guidance (2017) which identified two designated heritage assets, Bradford on Avon Conservation Area and Bath Road Post Office (Grade II Listed), whose significance was identified in this assessment as being susceptible to the effects of the proposed scheme.
- 7.4. A settings assessment for Bradford on Avon Conservation Area has identified that the Site does contribute positively (although to a limited degree) to its significance, primarily due to the presence of the former farm buildings. The loss of these buildings (with the exception of Building A), therefore, whilst negligible in the overall context of the surrounding area, does bring a very small level of less than substantial harm (lower end) to the significance of the Conservation Area. As such, the provisions of paragraph 215 of the NPPF (2024) are triggered and the very low level of harm should be assessed in the planning balance.
- 7.5. The assessment has also identified that the Site makes a positive (if limited) contribution to the significance of the Bath Road Post Office. The assessment has concluded that the proposed scheme will result in a very small amount of less than

substantial harm (lower end) to the significance of the Listed Building through changes to its setting, and the very low level of harm should be assessed in the planning balance.

8. REFERENCES

Historic England 2008 *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment*

Historic England 2015 *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment*

Historic England 2016 *Historic England Advice Note 1: Conservation Area Designation, Appraisal and Management*

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

Historic England 2017b *Listing Selection Guide: Agricultural Buildings*

Historic England 2019 *Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets*

Historic England 2021 *Historic England Advice Note 7: Local Heritage Listing: Identifying and Conserving Local Heritage*

Historic England 2024 *National Heritage List for England* <https://historicengland.org.uk/listing/the-list/>

Ministry for Housing, Communities and Local Government 2024 *National Planning Policy Framework (NPPF)*; published December 2024

Planning (Listed Buildings and Conservation Areas) Act 1990 Act of UK Parliament

Wiltshire Council 2008 *Bradford on Avon Conservation Area Character Assessment*

Wiltshire Council 2015 *Wiltshire Core Strategy*
https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wiltshire_Core_Strategy_2015

Cartographic sources (viewed at Promaps)

1886-1887 Extract of the Ordnance Survey Map, 1:2,500

1924 Extract of the Ordnance Survey Map, 1:2,500

1975 Extract of the Ordnance Survey Map, 1:2,500

Subsequent Ordnance Survey maps viewed at: <http://www.envirocheck.co.uk/> and www.maps.nls.uk/geo/find/ and <https://maps.bristol.gov.uk/>

APPENDIX 1: HERITAGE STATUTE POLICY & GUIDANCE

Heritage Statute: Listed Buildings

Listed buildings are buildings of 'special architectural or historic interest' and are subject to the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'). Under Section 7 of the Act 'no person shall execute or cause to be executed any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest, unless the works are authorised.' Such works are authorised under Listed Building Consent. Under Section 66 of the Act 'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any feature of special architectural or historic interest which it possesses'.

Note on the extent of a Listed Building

Under Section 1(5) of the Act, a structure may be deemed part of a Listed Building if it is:

- (a) fixed to the building, or
- (b) within the curtilage of the building, which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948

The inclusion of a structure deemed to be within the 'curtilage' of a building thus means that it is subject to the same statutory controls as the principal Listed Building. Inclusion within this duty is not, however, an automatic indicator of 'heritage significance' both as defined within the NPPF (2024) and within Conservation Principles (see Section 2 above). In such cases, the significance of the structure needs to be assessed both in its own right and in the contribution it makes to the significance and character of the principal Listed Building. The practical effect of the inclusion in the listing of ancillary structures is limited by the requirement that Listed Building Consent is only needed for works to the 'Listed Building' (to include the building in the list and all the ancillary items) where they affect the special character of the Listed building as a whole.

Guidance is provided by Historic England on 'Listed Buildings and Curtilage: Historic England Advice Note 10' (Historic England 2018).

Heritage Statute: Conservation Areas

Conservation Areas are designated by the local planning authority under Section 69(1)(a) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'), which requires

that ‘Every local planning authority shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance’. Section 72 of the Act requires that ‘special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’.

The requirements of the Act only apply to land within a Conservation Area; not to land outside it. This has been clarified in various Appeal Decisions (for example APP/F1610/A/14/2213318 Land south of Cirencester Road, Fairford, Paragraph 65: ‘*The Section 72 duty only applies to buildings or land in a Conservation Area, and so does not apply in this case as the site lies outside the Conservation Area.*’).

The NPPF (2024) also clarifies in Paragraph 220 that ‘*Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance*’. Thus land or buildings may be a part of a Conservation Area, but may not necessarily be of architectural or historical significance. Similarly, not all elements of the setting of a Conservation Area will necessarily contribute to its significance, or to an equal degree.

National heritage policy: the National Planning Policy Framework

Heritage assets and heritage significance

Heritage assets comprise ‘a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest’ (the NPPF (2024), Annex 2). Designated heritage assets include World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields and Conservation Areas (designated under the relevant legislation; NPPF (2024), Annex 2). The NPPF (2024), Annex 2, states that the significance of a heritage asset may be archaeological, architectural, artistic or historic. Historic England’s ‘Conservation Principles’ looks at significance as a series of ‘values’ which include ‘evidential’, ‘historical’, ‘aesthetic’ and ‘communal’.

The setting of heritage assets

The ‘setting’ of a heritage asset comprises ‘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’ (NPPF (2024), Annex 2). Thus it is important to note that ‘setting’ is not a heritage asset: it may contribute to the value of a heritage asset.

Guidance on assessing the effects of change upon the setting and significance of heritage assets is provided in 'Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets', which has been utilised for the present assessment (see below).

Levels of information to support planning applications

Paragraph 207 of the NPPF (2024) identifies that 'In determining applications, local planning authorities should require an applicant 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'.

Designated heritage assets

Paragraph 202 of the NPPF (2024) explains that heritage assets 'are an irreplaceable resource and should be conserved in a manner appropriate to their significance'. Paragraph 212 notes 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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. Paragraph 213 goes on to note that 'substantial harm to or loss of a grade II listed building...should be exceptional and substantial harm to or loss of designated heritage 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'.

Paragraph 215 clarifies that 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use'.

Wiltshire Core Strategy (Adopted 2015)

Core Policy 58: Ensuring the conservation of the historic environment

Development should protect, conserve and where possible enhance the historic environment. Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including:

- i. nationally significant archaeological remains

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- ii. World Heritage Sites within and adjacent to Wiltshire
 - iii. buildings and structures of special architectural or historic interest
 - iv. the special character or appearance of conservation areas
 - v. historic parks and gardens
 - vi. important landscapes, including registered battlefields and townscapes.

Distinctive elements of Wiltshire's historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced. The potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping). Heritage assets at risk will be monitored and development proposals that improve their condition will be encouraged. The advice of statutory and local consultees will be sought in consideration of such applications.

Good Practice Advice 1-3

Historic England has issued three Good Practice Advice notes ('GPA1-3') which support the NPPF. The GPAs note that they do not constitute a statement of Government policy, nor do they seek to prescribe a single methodology: their purpose is to assist local authorities, planners, heritage consultants, and other stakeholders in the implementation of policy set out in the NPPF. This report has been produced in the context of this advice, particularly 'GPA2 – Managing Significance in Decision-Taking in the Historic Environment' and 'GPA3 – The Setting of Heritage Assets'.

GPA2 - Managing Significance in Decision-Taking in the Historic Environment

GPA2 sets out the requirement for assessing 'heritage significance' as part of the application process. Paragraph 8 notes 'understanding the nature of the significance is important to understanding the need for and best means of conservation.' This includes assessing the extent and level of significance, including the contribution made by its 'setting' (see GPA3 below). GPA2 notes that 'a desk-based assessment will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area, and the impact of the proposed development on the significance of the historic environment, or will identify the need for further evaluation to do so' (Page 3).

GPA3 – The Setting of Heritage Assets

The NPPF (Annex 2: Glossary) defines the setting of a heritage asset as 'the surroundings in which a heritage asset is experienced...'. Step 1 of the settings assessment requires heritage

assets which may be affected by development to be identified. Historic England notes that for the purposes of Step 1 this process will comprise heritage assets ‘where that experience is capable of being affected by a proposed development (in any way)...’.

Step 2 of the settings process ‘assess[es] the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated’, with regard to its physical surrounds; relationship with its surroundings and patterns of use; experiential effects such as noises or smells; and the way views allow the significance of the asset to be appreciated. Step 3 requires ‘assessing the effect of the proposed development on the significance of the asset(s)’ – specifically to ‘assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it’, with regard to the location and siting of the development, its form and appearance, its permanence, and wider effects.

Step 4 of GPA3 provides commentary on ‘ways to maximise enhancement and avoid or minimise harm’. It notes (Paragraph 37) that ‘Maximum advantage can be secured if any effects on the significance of a heritage asset arising from development liable to affect its setting are considered from the project’s inception.’ It goes on to note (Paragraph 39) that ‘good design may reduce or remove the harm, or provide enhancement’.

Heritage significance

Discussion of heritage significance within this assessment report makes reference to several key documents. With regard to Listed buildings and Conservation Areas it primarily discusses ‘architectural and historic interest’, which comprises the special interest for which they are designated.

The NPPF provides a definition of ‘significance’ for heritage policy (Annex 2). This states that heritage significance comprises ‘The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic’. This also clarifies that for World Heritage Sites ‘the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance’.

Regarding ‘levels’ of significance the NPPF (2024) provides a distinction between: designated heritage assets of the highest significance; designated heritage assets not of the highest significance; and non-designated heritage assets.

Historic England's 'Conservation Principles' expresses 'heritage significance' as comprising a combination of one or more of: evidential value; historical value; aesthetic value; and communal value:

- Evidential value – the elements of a historic asset that can provide evidence about past human activity, including physical remains, historic fabric, documentary/pictorial records. This evidence can provide information on the origin of the asset, what it was used for, and how it changed over time.
- Historical value (illustrative) – how a historic asset may illustrate its past life, including changing uses of the asset over time.
- Historical value (associative) – how a historic asset may be associated with a notable family, person, event, or moment, including changing uses of the asset over time.
- Aesthetic value – the way in which people draw sensory and intellectual stimulation from a historic asset. This may include its form, external appearance, and its setting, and may change over time.
- Communal value – the meaning of a historic asset to the people who relate to it. This may be a collective experience, or a memory, and can be commemorative or symbolic to individuals or groups, such as memorable events, attitudes, and periods of history. This includes social values, which relates to the role of the historic asset as a place of social interactive, distinctiveness, coherence, economic, or spiritual / religious value.

Effects upon heritage assets

Heritage benefit

The NPPF clarifies that change in the setting of heritage assets may lead to heritage benefit. Paragraph 219 of the NPPF (2024) notes that 'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and 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 the asset (or which better reveal its significance) should be treated favourably'.

GPA3 notes that 'good design may reduce or remove the harm, or provide enhancement' (Paragraph 28). Historic England's 'Conservation Principles' states that 'Change to a significant place is inevitable, if only as a result of the passage of time, but can be neutral or beneficial in its effects on heritage values. It is only harmful if (and to the extent that) significance is reduced' (Paragraph 84).

Specific heritage benefits may be presented through activities such as repair or restoration, as set out in Conservation Principles.

Heritage harm to designated heritage assets

The NPPF (2024) does not define what constitutes ‘substantial harm’. The High Court of Justice does provide a definition of this level of harm, as set out by Mr Justice Jay in *Bedford Borough Council v SoS for CLG and Nuon UK Ltd*. Paragraph 25 clarifies that, with regard to ‘substantial harm’: ‘Plainly in the context of physical harm, this would apply in the case of demolition or destruction, being a case of total loss. It would also apply to a case of serious damage to the structure of the building. In the context of non-physical or indirect harm, the yardstick was effectively the same. One was looking for an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced’.

Effects upon non-designated heritage assets

The NPPF (2024) paragraph 216 guides that ‘The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset’.

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