

Abbey Mill

Flood protection measures

Design and Access statement
August 2025

For Planning Only

1.00 SUMMARY

1.01 This document presents proposed minor works at Abbey Mill, which is a Listed Building.

1.02 This application seeks planning and listed building consent for the formation of;

- A new secondary 'first responder emergency use only' pedestrian entrance with flood resilient features. This utilizes an existing blocked boundary stone wall aperture.
- Flood resilient feature incorporated into existing lower main block building windows that face directly onto the river.
- Reconfiguration to the flat 14 entrance door (1996 installation) to provide flood resilience, improved security, privacy and an improved historical appearance for the locality.

1.03 The proposed works indicated in this Planning Application will be developed and completed by competent specialists/manufacturers insuring performance requirements.

1.04 A Pre-Application has been completed. Reference ENQ/2025/01599. Summarised below;

i) New pedestrian entrance to courtyard

"There would be some loss of historic fabric through the knocking through of the external boundary wall. However, the proposal would serve as a benefit to the safety of residents. The proposed external timber door would not be out of character with the central arch and the opening to the outside would be entirely in keeping with this former industrial building."

ii) Adjustments to flat 14 dwelling entrance

In principle there is no conservation objection as this wall is new fabric infilled in the late 1990's when the mill was converted to residential use. As such, there would be some changes externally however subject to sensitive design this could be successfully achieved by replicating the stone entrance details and serve as a benefit to the safety of residents. However, there is an issue since the land is not owned by the retirement complex and is owned by the Highway Authority and as such this ownership would need to be resolved.

iii) Adjustment to lower level windows

The window sections proposed for replacement are not original and appear to date from the late 1990's at the time of the conversion of the building to residential use. Lack significant historical value. Both sections of the sills and lower sashes are rotten and have been frequently repaired, and are in need replacement regardless.

On balance, providing that the enhancement was made to match the window profiles with the upper original sections of the sash windows, this would be supported in conservation terms.

Summary:

The harm that will result from the above changes via loss of a small amount of historic fabric for the emergency access is small (within the context of the building and development overall) loss of fabric and change in character will be offset by improvements to the safety of residents and design enhancements internally which will better reveal the historic fenestration of the mill.

2.00 EXISTING SITE

2.01 The site is the Abbey Mill. The Main Block, being the imposing element, is 5 storeys stone building. Windows are contained within shallow vertical recesses, carried upwards through all floors and terminating in lancet-arched heads. Above is a continuous corbel table supporting a moulded cornice and plain parapet with moulded coping. Window have a pointed segmental head, glazing bars and swivel-hung transom light.

A single story footprint continues from the Main Block to the south west and also to the north both abutting Church Street.

A external courtyard currently used as car parking separates further build forms to the east.

A boundary stone wall separates the Abbey Mill external courtyard from Church Street to the north. This is where the vehicle entrance is located.

Further information can be seen in 2.05.

2.02 The site is in the town of Bradford on Avon north of the river Avon. The building falls within Bradford on Avon's Conservation Area.

2.03 The 2.03 Abbey Mill is listed Grade II*. The List Entry Number is; 1200197

2.04 Further listed buildings in the surrounding context include as annotated on the map below;

- 1) 6 Church Street (Grade II).
- 2) 4&5 Church Street (Grade II).
- 3) Lloyds Bank (Grade II).
- 4) Midland Bak (Grade II).
- 5) Holy Trinity Church Hall (Grade II*).
- 6) Church House (Grade II*).
- 7) The Dutch Barton (Grade II).
- 8) Dutch Barton Cottage (Grade II).
- 9) Abbey House (Grade II*).
- 10) Gates/Walls Abbey House (Grade II).
- 11) Holy Trinity Church (Grade I).
- 12) Wesbury House (Grade II*).
- 13) The Tow Bridge ad Chapel (Grade I).
- 14) Lamb Building (Grade II).



Image to the left indicates 'surrounding' Listed Buildings.

2.05 A summary of Abbey Mill evolution and use is listed below taken from the *Bradford on Avon Museum* website;

Downstream from the weir that provided power for the Greenland and Kingston Mills, a group of woollen cloth factories developed in Church Street between the Town Bridge and Holy Trinity Church- Bullpit, Church Street and Abbey Mills. Originally a miscellaneous collection of workshops, they developed piecemeal into larger factories, perhaps taking the place of older houses. They were the home of two industries that were important in Bradford on Avon's history woollen cloth and rubber manufacture- and are now no more.

In 1824 it was purchased by the partnership of Yerbury, Tugwell & Edmonds and from 1833 both Abbey and Church Street Mills were run in conjunction by Ezekiel Edmonds & Co. until they became bankrupt in 1862. Both mills were vacant in 1865. From 1869 to 1898 they were run by a succession of short-lived and related partnerships: Harper & Taylor; Harper, Taylor & Willis; Ward, Taylor & Willis and H.H. Willis.

The mills and their machinery were offered for auction in 1898 after the death of Willis and 1902 cloth manufacture ceased with all the plant auctioned by a Yorkshire company, followed by the closing of Greenland Mills the following year. There was a brief period in which part at least of the buildings was used by the rug company of Budbury.

The western mill buildings were substantially rebuilt in 1874-5 into a square block that provided a greater floor area for machinery. The architect was Trowbridge-born Richard Gane of a Bath firm. Abbey Mill was used as a billet for Australian soldiers in the First World War and was taken over by the expanding George Spencer, Moulton Rubber Company in 1915, but it didn't seem to have purchased the mills until 1926. Rubber components were made there by the company, continued under Avon Rubber from 1956, converted to offices for the company by architects Thurlow Lucas & Janes and closed in 1995.

The mill complex was converted to retirement housing in 1997.

3,00 FLOODING

3.01 The site has been subject to damage through river flooding. Town flooding has increased and currently there is no meaningful or tangible Council or indeed an Environment Agency plan to alleviate town flooding. It is noted the EA had recently formally withdrawn funds for Bradford on Avon flood prevention.

3.02 Reference to the GOV.UK Flood Map for Planning indicates that the site is in Flood zone 3 (map shown below). Flood Zone 3 is an area with a high probability of flooding, specifically a 1% or greater chance of flooding from rivers in any given year area with a high probability of flooding. All proposals here look to manage flood risk.

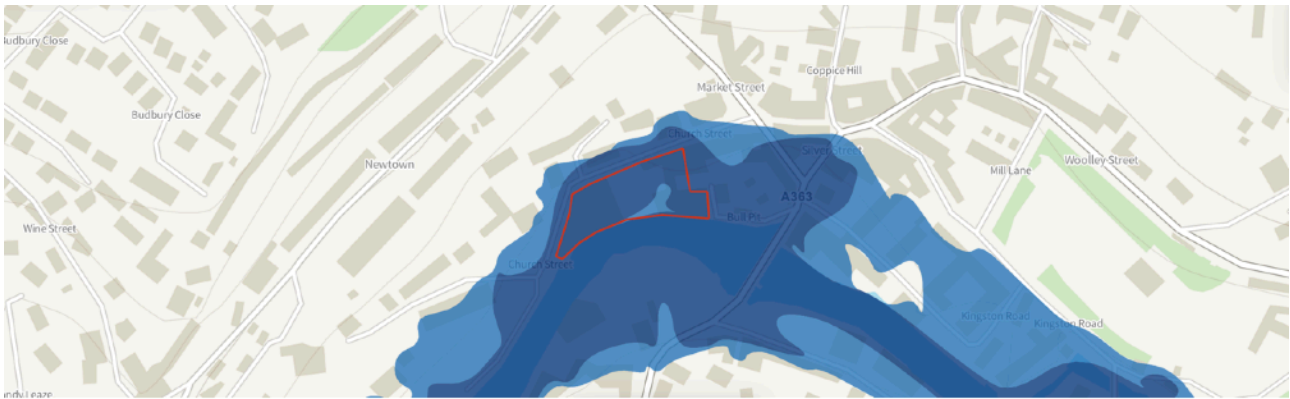


Image above is GOV.UK Flood Map showing the Abbey Mill Application Boundary in red line with Flood Zone 2 and 3 indicated.



Image above is GOV.UK Flood Map showing the Abbey Mill Application Boundary in red line with no food zones indicated for reference.

4. **PROPOSED DESIGN.** A new secondary 'first responder emergency use only' pedestrian entrance with flood resilient features that utilizes an existing blocked aperture.

4.01 USE ...The proposal seeks to form a 'first responder for emergency use only' pedestrian exit/entrance access for use during time of flood only to the boundary stone wall on the northwest corner of the car park leading onto Church Street.

This pedestrian access/egress point is an important improvement and will allow the estate management to close and seal the estate perimeter by way of closing the estates existing flood defence barrier, located at the vehicle entrance off Church Street, at 1.3m high ahead and in time of a pending flood.

It is important to note that the estate benefits from a substantial and effective flood defence system that incorporates flood barriers and ground pumps. However, it is only effective when flood barriers are deployed and maintained closed. Further, during the recent November 2024 flood the residents and the Listed Grade II* building was unnecessarily put at risk of harm and unnecessarily compromised by an insistence from the local fire department to reopen the main vehicle flood barrier under a "necessary evacuation of the residents on ground floors". The proposed new secondary entrance will alleviate this issue and provide an entrance and exit in times of emergency for the sole use of first responders such as the fire department, ambulances, carers, doctors, family members and residents. Resident safety is priority and access to and from the same is considered of paramount importance, hence the need for a secondary access that is flood proof during times of flood.



Image above view north from Abbey Mill Courtyard/Car Park to boundary wall

4.02 LAYOUT ...The proposed works look to complement the existing arched stone blocked aperture present on the north boundary wall abutting Church Street (shown above) by seamlessly inserting an arched hardwood timber frame and door within. The door would open into the site to not affect the pedestrian highway.

The proposals look to build a new low stone wall as a flood barrier internally within the Abbey Mill courtyard/car park area. A new stone stair will provide pedestrian access over the new wall and connect to the existing vertical tube balustrade and rounded plate handrail metal stair.

The proposed works still maintain access to the roof as per the existing condition.

4.03 SCALE ...The proposed works do not have implications for scale and would be seen as a continuation of the current existing arrangement and building features that were once open onto the street.



Image above is view South West from Church Street to the vehicle entrance to the Abbey Mill site and the proposed blocked aperture on the boundary stone wall.

4.04 LANDSCAPING ...The proposed works do not have implications for landscaping. The aesthetic of the Abbey Mill Courtyard/Car park will be maintained as existing.

4.05 APPEARANCE ...The proposed hardwood timber door will look to match existing door examples on site. Please refer to proposed drawings for details. Due to the design incorporating the door into an existing arch aperture it is understood the works will not materially change the external appearance of the building, except for the introduction of a door and frame consistent with the character of the building.

5.00 PROPOSED DESIGN - Adjustments to lower riverside south facing windows to provide flood resilience.

5.01 USE ...The proposed works look to add flood resilient features to the 13 number existing windows present on the south elevation at the lower building levels.

As shown in the image below, during the recent November 2024 flood the river level was dangerously close to the lower level windows that fronted residents living rooms and bedrooms.

The Abbey Mill windows are single glazed timber frame windows. They have a pointed segmental head, glazing bars and swivel-hung transom light. Given rising flood levels, the integrity and strength of these windows is not adequate to protect the building or the residents that live on the ground floor of this building.

The windows are a common language and are repeated at higher building levels. Care has been taken to create a proposal that does not diminish the aesthetic and character but also provides an important level of reinforcement to protect the building and occupants during ever increasing town floods.



Image above indicates the river flood level as seen in the recent November 2025 flood.

5.02 LAYOUT ...The proposal is to replace the lower section of the window with a structural laminated glass panel in a timber frame. Glazing bars would be surface mounted to maintain the existing aesthetics. The upper section of the window would be unchanged. Please refer to relevant drawings. It should be noted that the existing sills and the majority of the lower parts of stiles and jams are rotted and have been subjected to many repairs over the years. Modifications to the lower frames

that once opened are poorly amended. The historical value of the windows is therefore diminished through the afore mentioned.

5.03 SCALE ...The proposed works do not effect scale.

5.04 LANDSCAPING ...The proposed works do not have implications for landscaping.

5.05 APPEARANCE ...The proposed works do not materially change the external or internal appearance of the window or building.



Image above shows internal view of Abbey Mill window.

6.00 PROPOSED DESIGN - Reconfiguration to the flat 14 entrance door to provide flood resilience for same and ground floor of the main building.

6.01 USE ... Flat 14 is a single story dwelling on the south of the Abbey Mill complex. Flat 14 endures repeated frequent flood damage during times of flooding. Flood levels are seen to breach the external door and overtop the internal flight of stairs.

The proposal is to raise the existing external door to the height of the internal floor level. A stone external stair will provide access with flood resilient doors both at the base and at the top landing. These alterations are required for residents safety and to protect listed building fabric.



Image above (left) shows view from the south west from Church Street. Image above (right) shows view from the south from the bridge over the River Avon.

6.02 LAYOUT ... The proposals look to achieve the variation in access without disturbing the stepped access the riverbank or the vehicle parking provisions adjacent. The proposals have minimal internal effects. The existing internal 1996 installed stair will become surplus to requirements and will be overboard with flood sump pump installed below. It is important to note that the existing front door and its surrounding stonework was installed in circa 1996 therefore no historical fabric is to be altered. The existing course of later stone seen under the stone cornice and string course is inserted into the pre 1996 steel I beam that was over the earlier Avon Tire companies access into the building for unloading and loading. The entire elevation was a full width loading entrance with roller shutter door positioned adjacent to the now filled in steel beam. The proposed stone steps with integrated flood barriers would sit on land that was previously owned by the estate but given to the council for parking. The access to the front door is not used or needed for public access.

An alteration to the existing first parking space, that is already compromised by its narrow width (originally owned by the estate) and most often used for parking motorcycles, and the adjacent existing metal bollards will need to be undertaken to accommodate the proposed. NB, Motorcycles will still be able to park in the space regardless of the proposed, therefore no meaningful loss is incurred.

6.03 SCALE ...The proposed works have been carefully considered to be an appropriate scale.

6.04 LANDSCAPING ...The proposed works look to follow the aesthetic of the surrounding area. The lower terrace area adjacent to the property is in a poor condition.

6.05 APPEARANCE ...The proposed works do not materially change the external character of the building and uses materials and details present throughout the Mill building and surrounding area. The visibility of the works is screened by trees from the south. The proposal is considered to enhance the area in a sensitive and user-friendly manner that will protect the building and its occupants from rising floods.



Image above (left) shows entrance door from the external. Image above (right) shows entrance door from the internal with the internal flight of stairs.

7.00 CONCLUSION

The proposed work is essential to protect the Listed Grade II* building and to ensure the safety of the building residents and their belongings.

The proposed has been carefully considered to not harm the host building and is considered to offer a meaningful and conservation friendly solution to mitigate worsening flood events.

It is imperative the building and its residents are adequately protected. The emergency services, cares, family members must be able to easily access and exit to attend residents during times of flood, without adversely affecting the buildings' effective flood prevention system.

8.00 ASSOCIATED DRAWINGS & DOCUMENTS

XXXX.P001-Existing Location Plan

XXXX.P002-Existing Site Plan

XXXX.P010-Flood defence window - Existing

XXXX.P020-Flood egress entrance - Existing

XXXX.P030-Flood defence entrance - Existing

XXXX.P110-Flood defence window - Proposed

XXXX.P120-Flood egress entrance - Proposed

XXXX.P121-Flood egress entrance - Proposed

XXXX.P130-Flood defence entrance - Proposed

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Heritage statement
August 2025

For Planning Only

1.00 HERITAGE STATEMENT

1.01 SUMMARY....The Main Block of Abbey Mills is a Grade II* listed building, List Entry Number ... 1200197.

Abbey Mill is a former mill adjacent to the River Avon in the center of Bradford on Avon. Much of the square building form seen today was built in 1875. The mill was converted into a retirement complex in 1997.

2.00 LISTING STATEMENT.... *The main block of this factory, roughly square in plan, is an imposing structure. 1875 by Richard Gane. Ashlar, hipped slate roofs, 5 storeys. The principal elevation is 8-windowed, each window having a pointed segmental head, glazing bars and swivel-hung transom light. The windows are contained within shallow vertical recesses, carried upwards through all floors and terminating in lancet-arched heads. Above is a continuous corbel table supporting a moulded cornice and plain parapet with moulded coping. There is a brick-built polygonal smoke stack on a square ashlar base.*
All the listed buildings in Church Street the Chantry Little Chantry, Barton Orchard and the Catholic Church of St Thomas More, Market Street form a group with No 7 and Nos 9 to 19 Barton Orchard, Nos 5 and 6 and 27 to 31 (consec) and wall Newtown.
Listing NGR: ST8253260958

3.00 STATEMENT OF HISTORICAL IMPORTANCE..... Abbey Mills is considered to have both architectural and historic importance.

Abbey Mill is considered a 'particularly important building of more than special interest'.

The Mill setting is positioned in a prominent imposing setting in Bradford on Avon alongside the River Avon. Due to its scale and setting it can be viewed from multiple places across Bradford on Avon.

4.00 PLANNING HISTORY..... Abbey Mills has had a number of applications perviously. Recent applications are listed below.

Application Number	W/97/01241/LBC	Communal satellite dish and radio/tv aerial
Application Number	W/92/01134/LBC	Refurbishment of roof including re-slating using Welsh slates
Application Number	W/05/00084/FUL	Conversion of vacant section of Abbey Mill to apartments
Application Number	W/04/01901/FUL	Conversion of vacant section of Abbey Mill to apartments
Application Number	W/01/00207/FUL	One additional flat
Application Number	W/05/00085/LBC	Conversion of vacant section of Abbey Mill to apartments
Application Number	W/96/00743/LBC	Alterations and conversion of existing mill buildings to create 48 retirement flats with associated facilities including chapel library quiet rooms lounge and restaurant with dining room kitchen and
Application Number	W/97/00806/LBC	Removal of timber gates and erection of new gates
Application Number	W/04/01676/LBC	Alterations to television and radio aerials
Application Number	W/01/00208/LBC	One additional flat involving 4 windows on south and east elevations
Application Number	I4/05467/LBC	External decorations with any necessary window repairs/ replacements
Application Number	W/02/01583/LBC	Construction of an internal partition wall in concrete to provide an alternative means of escape

Application Number	W/97/00805/FUL	Erection of new vehicular and pedestrian gates
Application Number	W/05/00632/LBC	Retrospective application for extension to existing TV mast
Application Number	W/99/01301/LBC	Insertion of conservation rooflight
Application Number	W/96/00742/FUL	Alterations and conversion of existing mill to 48 flats and ancillary facilities
Application Number	W/04/01902/LBC	Conversion of vacant section of Abbey Mill to apartments
Application Number	PL/2022/00630	Create entrances between hobby room & kitchen thro
Pre-Application Number	ENQ/2025/01599	Urgent floor defence works to include; New pedestrian entrance to courtyard. Adjustments to flat 14 dwelling entrance. Adjustment to lower level windows.

5.00 IMPACT ASSESSMENT.....The sensitivity of the baseline views is high. There are a number of listed buildings (both grade I, II* and II) in the surrounding area and the Mill falls within the Bradford on Avon Conservation area.

The Magnitude of visual effect and change is considered low. This is due to the nature and design of the proposed works aiming to conserve heritage significance and to collaborate with the aesthetics of the host building.

It is therefore understood the proposed works have negligible impact to host building and conservation area.

Abbey Mill

Flood protection measures

Appendix - Letter between Applicant and Wiltshire Council Pre-Application Officer

For Planning Only

Date: 29/11/2025 12:53 GMT

Subject: Re: ENQ/2025/01599 Abbey Mill, Church Street, Bradford on Avon, Wiltshire, BA151HB

Dear Fiona,

It was good to meet you at Abbey Mill on Friday.

Entrance to Flat 14 – Flood Water Leading Through to Main Ground Floor

As requested, I have found evidence that the most westerly end of the estate (Flat 14 entrance) was previously a wide industrial loading entrance. I have attached 3 images of a plan submitted to the council building control in Nov 1996 which references this opening (see image 1, bottom left, circled in red).

Riverside Windows

Further to my previous email regarding the high flood water level in Nov 2024, with attached image, I think its fair to say we established in our meeting that the window section proposed for replacement are not original and lack significant historical value. They show modern timber construction (and machine planner marks), the sills are rotted and frequently repaired, and need replacement regardless. Using safety glass and frames made from Accoya will provide longevity in an area very difficult to maintain (riverside), resolving multiple issues, but above all the safety of our residents. The fenestration of the frames will be the same as existing. In fact, we actually have opportunity to reintroduce the original tampered moulding profile consistent with the upper part of the window frames and to match the remainder of the building.

New Pedestrian Church Street Entrance

This proposal is critical for emergency access to and from the estate for emergency services and carers during floods. The current estate flood defence is inadequate and there is no emergency access for the multiple days when flood barriers are deployed. The proposed plan uses an existing, blocked-up window aperture which is ideally located for an emergency access point. The benefits to resident safety and listed building significantly outweigh any minimal impact on the listed building or local area.

Town Flooding and Resident Safety

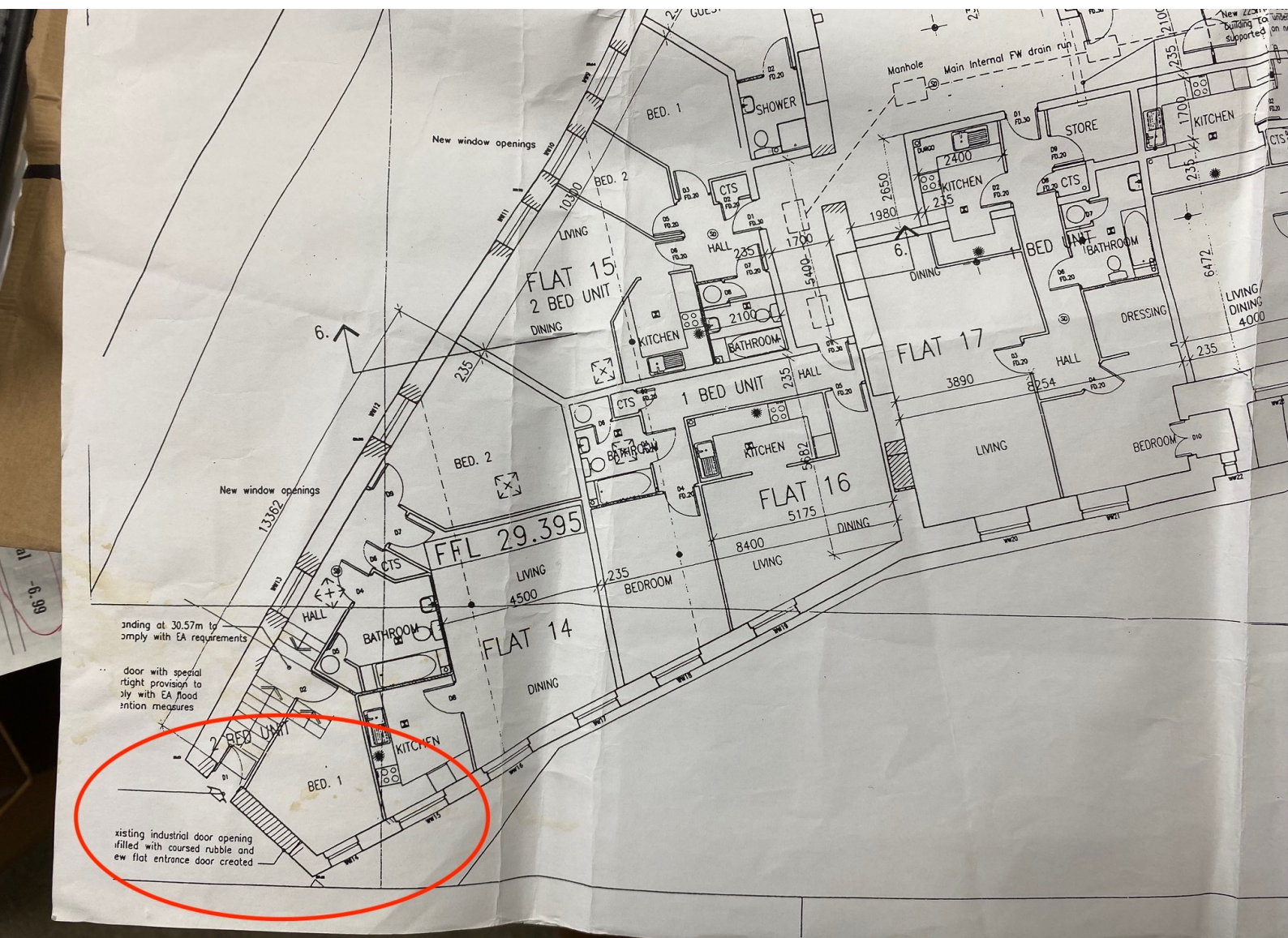
Town flooding is worsening, and as matter of fact, neither the council nor the environment agency has a plan, or indeed the funds available to relieve it. Bradford on Avon is not a priority and never will be, given its small size and those effected. I believe there is an obligation to ensure the safety of our residents and to protect the listed building which both are clearly at risk.

I hope the above and attached images are helpful. If you need anything further please do let me know.

Kind regards

Applicant (details retracted)







CHURCH STREET



Comments: This drawing is a preliminary plan and is not to be used for construction purposes. It is intended to show the general layout and dimensions of the proposed development. The final plan will be submitted to the local planning authority for approval. The plan is based on the information provided by the client and is subject to change without notice.

- 1. General notes: This drawing is a preliminary plan and is not to be used for construction purposes. It is intended to show the general layout and dimensions of the proposed development. The final plan will be submitted to the local planning authority for approval. The plan is based on the information provided by the client and is subject to change without notice.
- 2. Key to symbols: This drawing uses the following symbols to indicate the layout and dimensions of the proposed development.
- 3. Dimensions: The dimensions shown in this drawing are in feet and inches. The dimensions are given to the nearest foot and inch.
- 4. Notes: The notes in this drawing provide additional information about the proposed development. The notes are given in the form of numbered paragraphs.

BRAIN BYSHOP ARCHITECTS
RESIDENTIAL CONVERSIONS
Haverhill House, Bath, Avon, BA2 6LR
Tel: 01225 460427 Fax: 01225 460522

**RESIDENTIAL CONVERSION OF
ABBEY MILL AND OUTBUILDINGS,
BRADFORD-ON-AVON**
Detail
GROUND FLOOR PLAN,
INCLUDING SITE LAYOUT.

Drawing No.	1461/028	revision	B.
Scale	1:100		
Date	13/11/96	Drawn by	SMK/MSB
Project drawing in AutoCAD		checked by	
Filename	1461-028.dwg		