

Wiltshire Council Planning Consultation Response

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Application No: PL/2026/00633 and PL/2026/00427
Flood defence works to include the formation of a new pedestrian entrance to the courtyard, adjustments to the entrance of Flat 14, and alterations to lower level windows. Works will also include the removal of sections of walling to facilitate the new openings
Abbey Mill, Church Street, Bradford On Avon, BA15 1HB

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

Recommendations:

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

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

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

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

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

National Planning Practice Guidance provides guidance on interpreting the NPPF.

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

Wiltshire Council's Core Strategy Policy CP57 'Ensuring high quality design and place shaping': A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality.

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

Site and assets considered: The host building is a former mill located alongside the river towards the centre of the town. It is a Grade II* listed building located within Bradford on Avon Conservation Area. The site also affects the setting of a number of listed buildings including Town Bridge which is Grade I and of national importance.

Proposal: The proposal seeks consent for flood defence works to include the formation of a new pedestrian entrance to the courtyard, adjustments to the entrance of Flat 14, and alterations to lower level windows. Works will also include the removal of sections of walling to facilitate the new openings.

Relevant planning history: 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 (approve); W/05/00084/FUL and W/05/00085/LBC - Conversion of vacant section of Abbey Mill to apartments (approve); W/97/00805/FUL and W/97/00806/LBC – Removal of timber gates and erection of new gates (approve); W/01/00208/LBC - One additional flat involving 4 windows on south and east elevations (refuse); 14/05467/LBC - External decorations with any necessary window repairs/ replacements (withdrawn); W/02/01583/LBC - Construction of an internal partition wall in concrete to provide an alternative means of escape (approve); W/96/00742/FUL - Alterations and conversion of existing mill to 48 flats and ancillary facilities (approve); PL/2022/00630 - Create entrances between hobby room & kitchen through to common room, relocate & reverse managers office, expose & fit frameless window, Reopen x2 skylights, replace main timber doors, formation of internal lobby, x2 openings through concrete wall, replace internal doors, remodel kitchen and expand hobby room (approve); ENQ/2025/01599 - Proposals: Urgent floor defence works to include:
i) New pedestrian entrance to courtyard; ii) Adjustments to flat 14 dwelling entrance;
iii) Adjustment to lower level windows.

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

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

affected, its date or significance or of the impact of the proposals and, as a result, it fails to meet the requirements of the NPPF.

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

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

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

Assessment: The property is a Grade II* listed building located in Bradford On Avon Conservation Area.

The property is the Abbey Mill. The Main Block is a 5 storey 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.

The works are in three parts, each is described and assessed in turn below:

i) New pedestrian entrance to courtyard

This proposal is to provide emergency access to and from the retirement complex for emergency services and carers during floods. The current complex has no emergency access for the multiple days when flood barriers are deployed. The proposed plan would create a door opening in an existing, blocked-up window aperture which is evident from inside the internal courtyard; externally this appears as a central recessed arch in the curtilage listed boundary wall. The proposal would see the construction of a low level wall with a flood gate and the modification of an existing modern metal external staircase.

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

It is proposed to raise the level of the entrance door to flat 14, which internally floods on a regular basis due to ground water run off inside the building in the lobby area. The main internal living space is at a raised level, hence it is proposed to raise the entrance externally and provide an external flood wall to protect the threshold of the building.

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.

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

It is proposed to alter the lower sections of 7 of the sash windows on the ground floor of the building. In the high flood water level that the town experienced in November 2024, the water level was at the sill height of the windows, leaving residents concerned at safety should flood waters increase in depth. As such, it is proposed to replace the sills and the bottom section of each window with a new sash section constructed from accoya timber and safety glass with planted on timber glazing bars. 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. The proposed use of safety glass and accoya timber would provide longevity in an area very difficult to maintain (riverside) and improve the safety of the residents. The fenestration design would be the same as existing, apart from the planted on glazing bars.

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.

Summary & conclusion: The NPPF confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It makes clear that any harm to a designated heritage asset requires clear and convincing justification.

The impact of the proposals on heritage assets will be neutral and the requirements of current conservation legislation, policy or guidance are considered to be met and there is therefore no objection to the approval of the application.

Could the planning officer please condition that the glazing bars on the proposed replacement lower section of windows match that of the original tampered moulding profile consistent with the upper part of the window frames and to match the remainder of the building.

Also can model condition WB8 - NATURAL STONE TO MATCH EXISTING also be attached.

