



Historic England

Mr David Cox
Wiltshire Council
Development Management, County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Direct Dial: 00

Our ref: L01557292

2 February 2026

Dear Mr Cox

**Arrangements for Handling Heritage Applications Direction 2021
& T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**MILL HOUSE, 58 STALLARD STREET, TROWBRIDGE, WILTS, BA14 8HH
Application Nos PL/2023/01871 & PL/2022/02557**

Thank you for your letters of 7 March 2023 and 12 January 2024 regarding the above applications for listed building consent and planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the applications.

Historic England Advice

Significance

Located within the historic centre of Trowbridge and the homonymous Conservation Area, Mill House is significant as part of the Clarks Mill complex, formerly known as Studley Mill.

With their scale, design and materiality so strikingly different from the rest of the conservation area, the buildings of the Clarks Mill complex and other industrial groups nearby provide significant evidence of the town's industrial prosperity gained via the manufacturing of woollen cloth in the late 18th and 19th century.

Mill House, formerly known as Bridge House, was built in the early 19th century as the accommodation for the mill owners, the Clarks' family. It was strategically located between the railway and River Biss, just after the bridge, and alongside Stallard Street which provides the western approach to the town.



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Although altered and extended at different times and damaged both by an arson attack in 1817 and bombing during the Second World War, the house retains some of its late Georgian fabric and style in the brickwork, sash windows, chamfered stone quoins and in the elaborate doorcases. Internally less fabric survives although the list description notes the presence of historic plaster and an original staircase with panelled and reeded ends to the steps and the moulded handrail.

Because of its evidential value and historic and architectural interest, Mill House is listed at Grade II* as a particularly important building of more than special interest.

The two-storey southeast range attached to Mill House and facing Clarks Mill is separately listed Grade II and recorded as a mid-late 18th century workshop in the listing description. The Design, Access and Heritage Statement states that this range was entirely rebuilt following the WWII bomb damage. The original appearance of this range and the extent of the bomb damage to it is recorded in photographs in the Historic England photo archive 'England's Places'. This range is also recorded in a 1930 (EPW033289) and 1950s aerial photos (EAW028647 and EAW028649) included in the Historic England aerial photo collection which show that it retained the same overall scale and roof form pre and post war.

Impact of the Proposals

Historic England has previously provided in-principle support for the re-instatement of the lost northwest and northeast ranges of Mill House. This proposal provides a key opportunity to secure a more sustainable future for this important heritage asset and to further enhance its significance as a Grade II* building, the significance of the mill complex as a discernible group and the character and appearance of the Trowbridge Conservation Area.

In our response to applications PL/2023/01871 & PL/2022/02557 provided in April 2023 and in pre-application advice issued in June 2024 on revised proposals for Mill House, Historic England raised concerns about the lack of detail on the treatment of the historic foundations where the new ranges are proposed and the proposed architectural treatment for the elevations of the two new ranges.

Concerns remain regarding these points as well as the justification provided in the two submitted Design, Access, Planning and Heritage Statements (dated February 2022 and August 2024) as set out below.



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Historic Foundations

No details are included in the application documents regarding the proposed treatment of the historic foundations of the lost ranges. This should be provided to confirm how the historic and evidential value embodied in that fabric will be preserved.

Northeast Range

The two submitted Design, Access, Planning and Heritage Statements do not clarify whether any research has been completed into the design, form and scale of the former northeast range or if any historic photographs exist that show its appearance. The proposed design should be informed by such research in accordance with paragraph 208 of the NPPF and if no historic images are available this should be confirmed in the Heritage Statement.

The 1930 aerial photograph (EPW033289) included in the Historic England archive does not record a visible roofscape in the location of this range suggesting that it may have been lower in height, or that it was being rebuilt in 1930. The footprint of the former northeast range is recorded on the 1887 Ordnance Survey Town Plan of Trowbridge which shows that its northeast elevation had a canted bay adjoined by a porch and faced a garden lined with paths and hedges. This suggests it was a formal, but asymmetrical, elevation more in keeping with the character of Mill House than the abutting south-east former workshop range.

The 1887 town plan suggests that the former northeast range did not extend any further northeast than the current gable end wall of the southeast range which appears to be in its original location, although in part rebuilt. Removing the gable end of the southeast (Grade II) range would therefore result in a degree of harm to the separately listed southeast range through loss of the original building form, and some historic fabric, that must be weighed against the public benefits of the proposals. It should also be clarified in the accompanying reports that the northeast range would not follow the exact historic footprint of the lost historic range, if this is the case. It is not clear whether a gabled chimney shown on the main elevation of the southeast range in aerial photographs was removed with or without listed building consent, if the latter then steps should be taken to reinstate this.

The revised northeast elevation of the proposed range better reflects the fenestration and materials of Mill House than previous proposals, adopting multi-pane windows and a brick rather than stone façade. An explanation is required, however, as to why the



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proposed three gable elevation is considered appropriate in heritage terms. This prominent tripartite gabled form does not reflect the character of the other elevations of the main house, the simple form of the separately listed southeast range or the nearby mill buildings and would therefore likely appear incongruous. It could result in harm to the listed building and the setting of the nearby listed buildings and requires justification in line with paragraph 213 of the NPPF.

In addition to ensuring that the overall form and roofscape of the proposed northeast range complements Mill House and other nearby heritage assets, there is an opportunity to improve the detail of the elevation design to ensure the reinstated range enhances the site.

The current proposal shows the three gabled elevation punctuated by short six-pane windows on the ground floor, wide multi-pane French doors enclosed by railings on the first floor and tall six-over-six sashes in the second floor gables.

While the fenestration design is improved by the introduction of multi-pane glazing, this could better reflect the character and hierarchy of openings on the other elevations of Mill House by including taller windows on the ground floor, narrower openings on the first floor and smaller windows on the second floor. The first floor French doors, which are not found elsewhere on the site, would ideally be omitted but if preferred these could be narrowed and the railing design amended to better reflect a 19th century style.

In accordance with previous advice, we strongly encourage the use of high-quality materials and detailing across all elevations, ensuring the aesthetic value carried by the historic fabric of the southwest elevation is sustained throughout the site. We therefore discourage the use of reconstituted stone which is still shown for the new stone quoins on the proposed elevation drawings. The windows are mis-labelled on the proposed northeast elevation drawing as 'Heritage Aluminium RWG's' and clarification is needed that these, as well as the other proposed windows to all elevations, will be timber sashes.

Northwest Range

There is scope to notably improve the northwest elevation of the proposed northwest range by better replicating the original design and architectural detail recorded in the historic photograph. This photo clearly shows that the elevation was originally symmetrical with two bays flanking the central entrance bay and quoins at either end. This original arrangement was adopted in earlier proposals but has been altered. In its



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current form the proposed elevation appears unbalanced with the windows at the eastern end of the elevation located uncomfortably close to the taller northeast range. No justification has been provided for this departure from the recorded original design of the elevation.

The detail and proportions of the proposed window architraves and doorcase pediment, which originally extended beyond its supporting stone brackets, could also be amended to better reflect the original design. The original elevation had a gap between the first-floor windows and parapet cornice that should be included to improve the elevation proportions.

Design, Access, Planning and Heritage Statements

The relevant information from the two submitted Heritage Statements should ideally be combined into one document and expanded to include a more detailed assessment of the history and significance of the site and provide a strong justification for the proposals in accordance with policy.

Policy

Paragraph 208 of the NPPF states that “local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”

Paragraph 212 of the NPPF explains 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.”

The next paragraph, 213, goes on to set out that “any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.”

Paragraph 215 states that “where a development proposal will lead to less than



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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.”

Position

Historic England supports the principle of rebuilding the lost ranges of Mill House along their historic footprint.

However, the proposed new development would benefit from improved design, detailing and materials to ensure that it is of a high enough quality to enhance the significance of the designated asset and the character of the Conservation Area. A more detailed Heritage Impact Assessment is required that clearly sets out the known history and significance of the site and provides a strong justification for the proposed design of the reinstated ranges, and the changes to the separately listed southeast range, in heritage terms.

We are content to defer to the advice of your own conservation specialist with respect to the other details relating to masonry and structural repairs, including detailed specifications, method statements and samples of materials.

As advised previously, we note that the list entry, dating from 1976, would benefit from revision. We would recommend that, at some stage, the applicants apply for a Listing Enhancement to reflect the research that has been completed. Details of that process can be found on Historic England’s web page (<https://historicengland.org.uk/services-skills/our-planning-services/enhanced-advisory-services/listing-enhancement/>).

Recommendation

Historic England has concerns regarding the applications on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the applications to meet the requirements of paragraphs 208, 212, 213 and 215 of the NPPF.

In determining these applications you should bear in mind the statutory duty of Section 16(2) and Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account and seek amendments,



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safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

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