

Wiltshire Council Planning Consultation Response

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Helen Garside
Principal Conservation Officer
Wiltshire Council Conservation (Central)

Officer's Name: David Cox
Officer's Title: Senior Planning Officer

Application No: PL/2023/01871 & PL/2022/02557

Convert and extend Mill House to create 10 dwellings (5x3bedroom houses and 4x1 bedroom flats and 1x2 bedroom flat), an increase in 6 dwelling units on Mill House from application 17/00200/FUL. Regularisation of Clarks Mill development for 16 apartments and alterations

Clarks Mill and Mill House, 58 Stallard Street, Trowbridge

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

Recommendations:

☐	No Comment
☐	Support
☒	Support in principle subject to design amendments (set out below)
☐	Object (for reasons set out below)
☐	No objections

Scope of comments: the following comments relate to the built historic environment. Proposals for Clarks Mill itself remain as previously approved and implemented – I do not therefore intend to make any comment on this aspect and the following comments focus on Mill House.

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. Sections 16 (LBC) and 66 (PP) require that **special regard** be given to the desirability of preserving 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."

The Council's Core Strategy CP 57: Ensuring high quality design requires a high quality of design in all new developments. Proposals are required to "demonstrate how the proposal will make a positive contribution to the character of Wiltshire through (amongst other things) "enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development" and "responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting."

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: the applications relate to the later C19 Grade II listed Clarks Mill (listed as Studley Mill, Principal Factory) and the Mill House, the early C19 house erected by the wealthy owners of the Mill. The house is listed at grade II* and the workshop to the rear, which has earlier origins, is listed at grade II. Further research has shown that the bomb damage suffered by the building during the war resulted in a far greater level of loss and rebuilding than previously acknowledged. Additional bays to the left-hand end of the main front range were lost and not rebuilt (the remaining structure being simply made good with a plain gable), as was a projecting rear range facing Stallard Street and a range facing the river. Whilst there are some photographs of the roadside range, little is known about the riverside element. Much of the south-eastern 'workshop' range which was previously thought to date from the C18 seems to have been rebuilt or at least comprehensively remodelled using historic fabric after the war (albeit on the same footprint and maintain the same overall form and roof shape) whilst the other single storey structures are of post war date and modern design and fabric.

Proposal: the remaining house and rear range have previously been granted consent for conversion to 3 dwellings (a single dwelling in the main house and two in the rear wing) whilst a fourth dwelling was proposed in the post-war single storey extensions. The current application proposes the demolition of the post-war single storey workshops and the construction of new building (envisaged as a recreation of the historic structures) on the footprint of the historic ranges which were lost to wartime bomb damage. The proposed new structures would provide an additional net 1 house and 5 flats and it is suggested that they will assist towards the viability of the main scheme to restore and convert the remaining historic fabric of the house.

As noted above, proposals for Clarks mill itself remain as previously approved and implemented – I do not therefore intend to make any comment on this aspect and the following comments focus on Mill House.

Issues: impact on fabric and settings of the grade II* listed house and grade II rear buildings, impact on the setting of neighbouring listed buildings including the Mill, Beaufort Mansions and Handle House. Impact on the conservation area.

Significance of site: 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, the applications are accompanied by a further "Design, Access, Planning and Heritage Statement" which stands in addition to that submitted in March 2022. Together these documents provide only limited detailed analysis of the existing main range and the separately listed two storey rear 'workshop' wing but it is understood that the proposals for these areas remain largely unchanged from previous schemes in terms of heritage impact. The Statements also include

relatively brief justifications for the new build element and whilst they provide sufficient information to understand the main impact of the new proposals, further justification and explanation would be helpful as suggested by Historic England in their comments. 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.

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 remaining historic fabric and architecture (including the footings uncovered) and the evidence they provide for the historic form and appearance of the building, including internally. In addition, even in its current post-war form, the architectural expression/detailing and use of high-quality design materials within the retained building still hold significant aesthetic and architectural interest which contribute to the character of the conservation area.

Retained south-west range and south-east ‘workshop facing Clarks Mill.

It is understood that proposals for these areas remain largely as previously approved and there is therefore no objection in principle to these elements of the scheme. However, some time has elapsed since the original consent was granted and the condition of the Grade II* south-west range in particular has deteriorated considerably. There will be a need for significant works to put the building into an acceptable state of repair. It is acknowledged that the interior was significantly altered post war and that some of the main structure has been replaced fairly crudely. However, some good joinery is retained, including the main stair and window and door linings and a repair schedule will be required by condition to provide details for how these features will be repaired and preserved or replaced within the scheme. Previous conditions should also be reapplied to ensure appropriate control over the detail of the works proposed.

Principle of reinstatement of areas of the building lost to wartime damage – additional bays to existing SW range, new NW and NE ranges

Evidence has been provided in respect of the pre-war presence of significant further areas of the building. Two historic photos have been provided and there is evidence remaining on site in the form of the remnants of footings for the previous buildings although these are not illustrated on the submitted plans. Further evidence within Historic England’s archives is highlighted within HE’s response and these sources would ideally have been noted and taken into account within the submission.

Advice within Historic England’s Advice Note 2 – Making changes to Heritage Assets notes the following in rest of proposals for the restoration of previously lost elements from a building:

24. Restoration is likely to be acceptable if:

- The significance of the elements that would be restored decisively outweighs the significance of those that would be lost,
- The work proposed is justified by compelling evidence of the evolution of the heritage asset and is executed in accordance with that evidence, (my emphasis)
- The form in which the heritage asset currently exists is not the result of a historically-significant event,
- The work proposed respects previous forms of the heritage asset,
- No archaeological interest is lost if the restoration work could later be confused with the original fabric,
- The maintenance implications of the proposed restoration are considered to be sustainable.

The current scheme appears to have the potential to meet these requirements and, as a result as we have previously advised, there is no objection in principle to the proposed re-creation of the lost ranges to create a courtyard layout. It is noted and welcomed that the revenue from the additional houses can assist in the viability of the scheme and contribute towards the repair of the historic range.

However, it remains the case at present that there is insufficient detailed design information for the new build and that the elevations suggest that the design quality of the scheme will be inappropriate for an addition of this scale in such a sensitive context. Only partial account has been taken of previous advice given and the details of the design remain inadequate to preserve the character and appearance of the listed building or the wider conservation area. In general, I concur with Historic England's comments and agree with their suggestions as to where further consideration is required. Further amendment and a greater level of detail is required and this should be informed and justified by closer reference to the historic evidence which has been gathered during research.

It is noted that the proposed new build does not reflect the historic footprint of the buildings lost to the wartime damage. Instead, the building line of the riverside elevation is closer to the river than historically as it is proposed to be constructed on the line of the recently approved single storey extension to the workshop range rather than on the line of the current workshop gable, which reflects the historic situation. No information has been provided as to how the historic foundations will be treated or reflected within the development and this also introduces some additional design challenges. Whilst the new structure is designed to reflect the details of the historic building, it does not do so with accuracy. Historically, the building facing Stallard Street comprised a symmetrical 5-bay frontage contained by quoins to either end, with two bays to either side of a central door and doorcase. Map and photographic evidence suggests that beyond the 5 bay building was simply the normal gable span of the riverside range (which had a hipped roof facing the road and appears to have been a taller, perhaps three storey building). Omitting the quoins and simply extending the elevation has resulted in a design which fails to reflect the balanced design and proportions of the historic elevation. The proposed architectural detailing of the Stallard Street elevation also fails to reflect the detailing of the historic building as evidenced by historic photographs and is in conflict with Historic England Guidance that advises that restoration should be "justified by compelling evidence of the evolution of the heritage asset and is executed in accordance with that evidence".

It is understood that no historic photographs showing the appearance of the riverside elevation have been located although mapping evidence suggests a further formal elevation, as opposed to the more vernacular appearance of the workshop range. The supporting statements do not explain how the prominent triple gabled design or rather clumsy arrangement of fenestration currently proposed (which fails to reflect established architectural hierarchies) are justified or how they complement the character of the remaining elements of the building.

Taking into account the scale of the new construction proposed, a generic design of limited quality would detract from and diminish the significance of the remaining historic section of the building, as well as the settings of neighbouring buildings. Further work within an amended scheme is therefore required before the application can be recommended for approval. The design needs to be further developed in line with previous advice and a greater level of detail should be provided within the revised submission to illustrate the architectural detailing and construction of the new structures. These details should be informed and justified by reference to the historic evidence which has been gathered during research. Materials should be high quality traditional materials which reflect the architecture of the area. The change to a predominantly brick construction reflects the character of the existing building but re-constituted stone for the quoins fails to reflect the quality of this sensitive location. We have also previously advised that areas of communal amenity space should be designed out at the same time to ensure an overall coherent scheme which provides an appropriate setting for the grade II* building. A return to the historic footprint would be of benefit in this respect, allowing more space between the new north-east range and the riverside edge.

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.

In this case there is evidence to support the recreation of lost elements of the building and provided that the scheme is of high quality in terms of its design and materiality the proposals would have potential to enhance the setting of the host and neighbouring buildings. Unfortunately, at present the submitted

information suggests that the quality of the scheme is insufficient to achieve this aspiration and, instead, the proposals risk harming the setting of the heritage assets via a poor-quality design which fails to take the opportunities offered. The issues highlighted in these comments remain largely as advised in previous informal discussions and I am also in agreement with the advice provided by Historic England. We would therefore suggest that further work is required to revise the scheme to a standard appropriate to this location.