

CASE OFFICER'S REPORT

Application Reference:	PL/2026/00432
Application Type:	Listed building consent (Alt/Ext)
Consultation ends:	27 February 2026
Case officer:	Fiona Webb

Site Address:	39, 40, 41, 42 Silver Street, Kingston Mills Estate, Bradford on Avon, BA15 1JX
Proposal:	Renewal of Roof Terrace Coverings and Parapet Works
Recommendation:	Approve with Conditions

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 property is a Grade II listed building located in Bradford on Avon Conservation Area. The property also affects the setting of numerous other listed buildings in the locality.

Proposal: The proposal seeks the renewal of roof terrace coverings and parapet works.

Relevant planning history: W/06/02400/LBC - Comprehensive mixed use redevelopment comprising alterations to Buildings 2, 43-44, 53, 55, 70, 74, 76, 77, second floor extensions to Building 70, demolition to Buildings 41, 42, 61, 62-65, 68, 71, 72, 73, 75, 78 and associated works (approve); W/06/02394/FULES - Comprehensive mixed use redevelopment comprising 170 dwellings, commercial floor space and associated works (approved); W/10/02393/LBC - Installation of solar thermal panels to Buildings B, C, D, E, G, J and photovoltaics to Buildings H, M, N, Q East, R, S, T and K (approve); W/10/00361/LBC - Alterations to existing permission (06/02394/FULES) to accommodate a revised mix of uses and associated works (approve).

Issues: impact on the listed building, impact on the setting of neighbouring listed buildings, impact on 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, the application is accompanied by a “Heritage Statement” which provides sufficient information to understand the impact of the proposals and is proportionate to their scope. The requirements of the NPPF are therefore met in this respect.

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. Much of the special interest resides in its use of a reinforced concrete frame, demonstrating early C20 advances in civil engineering. The building is also significant for its historical association with rubber production at Bradford-on-Avon and the contribution it makes to the townscape.

Assessment: The property is a Grade II listed building located in Bradford on Avon Conservation Area located in close proximity to the nationally important Grade I Town Bridge. The building is part of a former rubber factory built in 1916 and was designed in part by architect E.J.C Manico.

The application is for proposed works to the roof terraces to Nos. 39, 40, 41 & 42 Silver Street as follows:

- Removal and replacement of the roof terrace membrane and modification of the roof deck to provide additional supporting members.
- Encapsulation of the internal face of the existing parapet wall and parapet copings to provide integral waterproofing and address delamination of the existing coping stones.

- Replacement of the terrace decking to the 4no. apartments.

Parapet encapsulation of the copings is proposed to address ongoing issues identified with delamination due to weathering, saturation and water ingress. At present to address health and safety concerns, protective netting has been installed over parts of the parapet to prevent detached and displaced materials falling to street level below. It is proposed to keep the existing stone parapet copings will in place. Externally the parapet copings would be fitted with a preformed powder coated aluminium coping sections which would encapsulate the existing copings and prevent water ingress. The aluminium coping sections would be powder coated to match the colour of the existing stonework, so reducing any visual impact and minimise the effect of any change in external appearance of the building.

Roof terrace works are necessary as the existing roof membrane to the terraces comprises of a PVC single ply membrane. Due to the failure of the underlying timber roof deck the membrane is supporting sumps of standing water. As part of the works, it is proposed to address the lack of supporting structure installed to the terrace decks with the installation of additional timber members fixed between the existing galvanised steel sections. The original roof deck to the building remains below the insulation. The proposed works does not have any impact on the original roof deck structure.

On completion of the terrace roofs, walkway decking will be reinstated to provide protection to the roof membrane and provide a safe and secure surface for the residents of the building.

The proposed works would not materially alter the appearance of the building and would have very little impact on historic fabric. The works are considered minor in nature and would have no detrimental effect on the heritage asset.

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.

CONSULTATION RESPONSES:

Bradford on Avon Town Council – no comments received

Bradford on Avon Preservation Trust – There is some urgency in making this listed building watertight by carrying out these sensitive remedial works to which we have no objection subject to no objection from the Conservation Officer.

Bradford on Avon Swift and House Martin group - there may be Swifts using these roofs for nesting. We would urge that this is born in mind if work is done. As these birds nearly always return to the same place to nest and may not do so if the space where they nested is blocked great care should be taken to observe the roof during the nesting season (May to August) and if Swifts are seen to be using it do not do the work during these months and note carefully where they are nesting and take care not to block their nesting spaces if the work is done outside the nesting season.

REPRESENTATIONS:

None

RECOMMENDATION:

Consent

REASON FOR GRANTING ~~PERMISSION~~/CONSENT/REFUSAL:

The proposed works would preserve the special historic interest of the heritage asset in accordance with Sections 16(2) of the Planning (Listed Building and Conservation Area) Act 1990 and NPPF section 16, because these works, subject to conditions, would have no overall detrimental impact on the historic fabric and would be of an appropriate design and material.

Conditions

- 1 The works for which Listed Building Consent is hereby granted shall be begun before the expiration of three years from the date of this consent.

REASON: To comply with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

- 2 The works hereby granted consent shall be carried out in accordance with the following approved plans and documents: Location, Site & Existing Roof Terrace Plan – dated 21/1/2026 Terrace Details - dated 21/1/2026 Heritage Statement - dated 27/1/2026 REASON: For the avoidance of doubt and in the interests of the significance of the heritage assets and their setting.

Informative

- 3 **Breeding bird informative:**

The adults, young, eggs and nests of all species of birds are protected by the Wildlife and Countryside Act 1981 (as amended) while they are breeding. Please be advised that works should not take place that will harm nesting birds from March to August inclusive. All British birds, their nests and eggs are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended) and the Countryside and Rights of Way Act 2000 while birds are nesting, building nests and sitting on eggs. The applicant is advised to check any structure or vegetation capable of supporting breeding birds and delay removing or altering such features until after young birds have fledged. Damage to extensive areas that could contain nests/breeding birds should be undertaken outside the breeding season. This season is usually taken to be the period between 1st March and 31st August but some species are known to breed outside these limits.

