

CASE OFFICER'S JOINT REPORT

Application Reference: PL/2026/00427 and PL/2026/00633
Application Type: Full planning permission and Listed building consent
Consultation ends: 27 February 2026
Case officer: Steven Sims

Site Address: Abbey Mill, Church Street, Bradford on Avon, BA15 1HB
Proposal: 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
Recommendation: Approve with Conditions

PROPOSAL AND SITE DESCRIPTION

The site

Abbey Mill is a 5 storey grade II* listed building located within the centre of Bradford on Avon and the Bradford on Avon Conservation Area. The former mill building is currently in residential use. The site is located adjacent to and near to numerous listed buildings as detailed in the constraints plan below. Existing commercial and residential development is located to the west, north and east.

The site is also located within the Bath and Bradford on Avon Bat Special Area of Conservation (SAC). The site is also located directly to the north of the River Avon and within flood zone 3b and is subject to surface water flooding.



Constraints plan - adjacent listed buildings

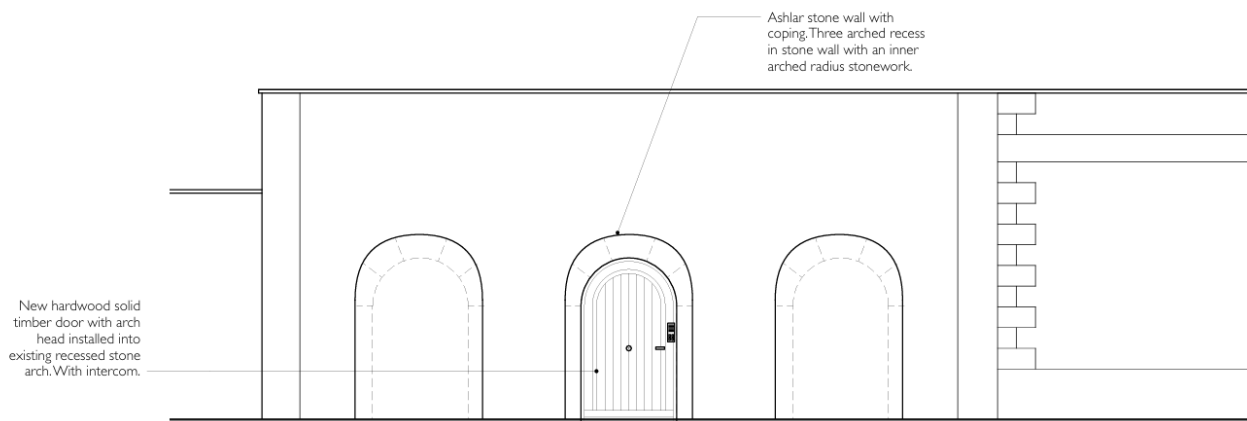


View of the property from Church Street

The application

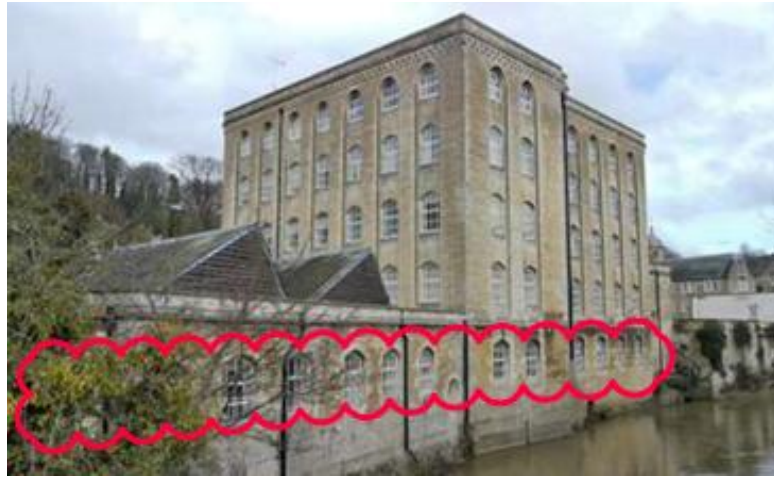
This is a full and listed building consent application for –

- A new secondary pedestrian entrance with flood resilient features. This utilises an existing blocked up boundary stone wall aperture. This would 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, ahead and in time of a pending flood.



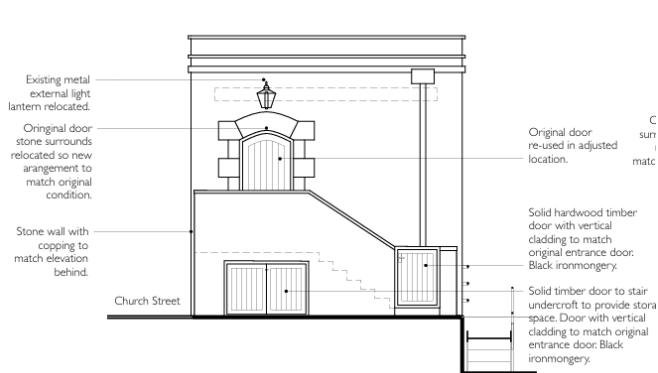
North elevation – proposed new door (Church Street)

- Flood resilient feature incorporated into existing lower main block building windows that face directly onto the river. 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.

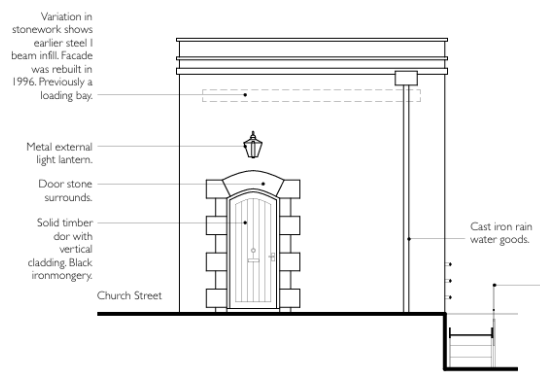


South elevation replacement windows

- Reconfiguration to Flat 14 entrance door to provide flood resilience, improved security, privacy. Flat 14 is a single storey property on the south of the Abbey Mill complex. The proposal seeks to raise the existing external door to the height of the internal floor level. A stone external stair would provide access with flood resilient doors both at the base and at the top landing. As detailed in the elevation plans below.



Proposed



Existing



Church Street entrance to flat 14 (Google maps)

POLICIES

Wiltshire Core Strategy (WCS)

Core Policy 1: Settlement Strategy; Core Policy 2: Delivery Strategy; Core Policy 7: Spatial Strategy
Bradford on Avon Community Area; Core Policy 50: Biodiversity and geodiversity; Core Policy 57:
Ensuring high quality design and place shaping; Core Policy 58: Ensuring the conservation of the historic
environment; Core Policy 67: Flooding

National Planning Policy Framework 2024 (the Framework) and Supplementary Planning Guidance

Other

Wiltshire Design Guide SPD 2024

Sections 16 and 66 of the Planning (Listed building and Conservation Area) Act 1990

Bradford on Avon Neighbourhood Plan 2013 to 2026

Wiltshire Council's Emerging Local Plan (WLP) 2020-2038 – The examination of the emerging Wiltshire Local Plan has been paused and the weight to be afforded to any part of the emerging plan can be no more than very limited. A decision on how to proceed will be made by the Council in May 2026.

RELEVANT PLANNING HISTORY

W/05/00084/FUL and W/05/00085/LBC – Conversion of vacant section of Abbey Mill to apartments – Approved

W/96/00742/FUL and W/96/00743/LBC – Alterations and conversion of existing mill buildings to create 48 retirement flats with associated facilities – Approved

There have also been numerous full and listed building consent applications involving alterations to Abbey Mills that are not considered relevant to the current scheme.

CONSULTATION RESPONSES

Bradford on Avon Town Council: No objection

Conservation Officer: No objection

Drainage Team: No objection

Historic England: No objection and deferred to the Councils conservation officer

Bradford on Avon Preservation Trust: Supportive and commends these sensitively designed proposals to mitigate against flood risk and help to ensure the security of the residents of the site subject to no objection from the Conservation Officer. Given the importance of this historic building, any decision to approve must be subject to appropriate conditions.'

REPRESENTATIONS

No third-party representations were received

ASSESSMENT

Principle of development

Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require that the determination of planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

The application site is located within the settlement of Bradford on Avon which is considered a Market Town in policy terms (CP2 of the WCS) where development is supported.

Impact on the setting of the listed building/character of the Conservation Area

Core Policy CP57 requires a high standard of design 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. Core Policy CP58 requires that *“designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance.”*

Paragraph 213 of the NPPF states *‘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 of the NPPF states *‘Where a development proposal will lead to less than 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.’*

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. Proposed works are detailed above.

i) New secondary pedestrian entrance –

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) Adjustment to south elevation lower-level windows -

It is proposed to alter the lower sections of 7 of the sash windows on the ground floor of the building. It is also 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.

iii) New pedestrian entrance to flat 14 –

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.

In conclusion it is considered 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.

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 the conservation officer has no objection to the scheme. The proposed development is therefore considered acceptable and would not result in harm to the setting or heritage of the grade II* listed building, setting of adjacent listed buildings including Town Bridge or the character of the Conservation Area.

Impact on the amenity of adjacent residents

Core Policy 57 of the Wiltshire Core Strategy requires a high standard of design in all new development and that development should have regard to the compatibility of adjoining buildings and uses, impact on the amenities of existing occupants.

The site is located within the centre of Bradford on Avon with existing commercial and residential development located to the west, north and east, while the River Avon is located adjacent to the south. The addition of the new door to the north elevation fronting Church Street and new entrance stairway to flat 14 would not result in additional overlooking/ loss of privacy to adjacent residents to to the topography of the siter and separation distance to adjacent residents. Alterations to the south elevation windows would also have no additional adverse impact on the amenity of neighbouring residents in terms of overlooking or loss of privacy.

Ecology issues

The site is located within the Bath and Bradford on Avon Bat Special Area of Conservation (SAC).

The proposed works are limited in scope, and the scheme would not result in significant impacts on the SAC and as such an Appropriate Assessment is not required.

Based on the information available the biodiversity gain planning condition is not considered to apply to this application as the development meets the relevant criteria.

Highway issues

The addition of a new stair to flat 14 would result in the loss of a single parking space off Church Street directly to the front of flat 14 entrance. This land is in the ownership of the council. However, the applicants advise this parking space is narrow and does not meet modern space standards and it is considered its loss would not compromise highway safety in the area.

CONCLUSION (THE PLANNING BALANCE)

The proposed development would not result in harm to the setting or heritage of the grade II* listed building, setting of adjacent listed buildings including Town Bridge or the character of the Conservation Area.

The proposed alterations would have no additional adverse impact on the amenity of neighbouring residents in terms of overlooking or loss of privacy.

The scheme would also ensure the safety of residents with regards flood events in the area.

RECOMMENDATION: Approve subject to conditions
