

Wiltshire Council Planning Consultation Response

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Application No: PL/2026/01891 & 02366
LBC - Conversion of existing building to form 4 bedroom dwelling (Resubmission of PL/2025/03051)
PP - Variation of condition 2 (Approved plans) of PL/2025/02733
24 Bridge Street, Bradford on Avon, BA15 1BY

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.

National Policy and guidance: 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 or 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 214-16 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.

Chapter 14 of the NPPF addresses the challenge of climate change, flooding and coastal change. Paragraph 167 advises that "Local planning authorities should also give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and

non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights). Where the proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the policies set out in chapter 16 of this Framework.”

National Planning Practice Guidance provides guidance on interpreting the NPPF. 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.

Historic England’s “Conservation Principles” provides policy and guidance for the “sustainable management of the historic environment”. Additional guidance is also contained within their publications:

- Historic Environment Good Practice Planning Advice Note 2 – Managing Significance in Decision-Taking in the Historic Environment (2015)
- Historic Environment Good Practice Planning Advice Note 3 – The Setting of Heritage Assets (2nd edition)

The following points are taken from the Historic England document “The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3” (HE GPA3) that are considered to be particularly relevant:

HE GPA3 Part 1:

“The NPPF makes it clear that the setting of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset.”

“The extent and importance of setting is often expressed by reference to visual considerations. ...views of or from an asset will play an important part...”

“While setting can be mapped in the context of an individual application or proposal, it cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time.”

“The importance lies in what the setting contributes to the significance of the heritage asset or to the ability to appreciate that significance.”

Other HE publications

[Traditional Windows: their care, repair and upgrading](#)

HE GPAs and HEANs [The Planning System | Historic England](#)

Historic England Advice Note 18 – Adapting Historic Buildings for Energy and Carbon Efficiency provides specific advice relevant to development of this nature.

Local Policy: 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.

Proposal: LBC - Conversion of existing building to form 4 bedroom dwelling (Resubmission of PL/2025/03051) & PP - Variation of condition 2 (Approved plans) of PL/2025/02733

Relevant planning history: Approved scheme - PL/2025/02733

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 applications are accompanied by a “Design, Access and 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.

The interest may be architectural, or historic as set out in the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 S 1.

The building has been subject to numerous changes over its lifetime, and at present, it is an empty shell with floors as much of the internal fabric has been removed. The remaining external walls show that the building has been subject to changes, extensions and repairs. The rear has had extensive intervention in the mid-late C20, including the creation of a glazed structure and the large flat roof.

Bradford-on-Avon Conservation Area retains a high quality of listed and non-listed buildings which contribute to the character. The core of the town lies to the north side of the River Avon and is formed of a cluster of small streets and buildings, which contrasts with the later replacement industrial building which front the riverside, and the larger polite buildings built from the industrial wealth of the town. Bridge Street lies to the south of the river, with the Georgian Lodge c.1735, with its larger scale and ashlar stone, contrasts with that of the site and its neighbour which is formed of coursed rubble stone.

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

Assessment:

The submitted applications look to amend the approved scheme which as the scheme progressed raised particular concerns and issues, generally in relation with Building Regulations. There is some consideration for the protection of the listed building and compliance with Building Regulations, particularly where they cause harm to significance, or modern requirements would cause long term defects. However, ensuring that the building complies with fire protection requirements, including means of escape, there is a presumption that this will outweigh the harm, unless in exceptional circumstances (such as a Grade I listed building with highly significant interiors), which do not apply to this situation.

The submitted proposed drawings have some additional alterations to those described in the Design, Access and Heritage Statement, so the works from both will be considered.

Replacement windows to front elevation

These works are not discussed within the submitted Heritage Statement, but the drawings show different windows to the consented scheme. During the site visit, it was highlighted that the proposed changes to the ground floors sash windows are due to the limited reveals of the existing fabric that would not support the sash box. However, whilst the proposed windows resemble those of a traditional sash, the proposed opening style is not traditional and is considered to be at odds with the building and street scene, creating a top-hung window which will be noticeable alien when open. Some of the neighbouring properties do not have opening windows to the ground floor, which are likely to have been shop windows, and therefore the introduction of a top-hung window is not supported. An alternative window or method of natural ventilation (if required for this space) should be considered.

The existing double door is proposed to be 'stripped back, repaired and made ready for automation'. The Lower-Level Plan shows this as a 'external entry courtyard', so it is unclear why the doors need to automate. Whilst this will have limited impact, the consideration for the equipment that will need to operate the doors needs to be considered, including the power supply and the placement of the motor. It would not be possible to place this externally as it would cause harm to the appearance of the street scene. Internally it would have the potential to cause harm to the fabric of the building.

Above the double doors, the approved windows were narrow aluminium frames, replicating the traditional appearance of a metal window that would have been installed here. The proposed scheme looks to replace this with a timber casement window with leaded lights. This will increase the bulk and the appearance of the frame (in terms of material and requiring an opening casement within a frame) and introduce opening casements to all three openings. Traditionally it would have had fixed panes either side and an opening casement in the centre formed of a metal casement. There is no justification for the proposed changes, and the revised option is considered to cause harm to the significance of the building and impact the character of the conservation area.

To the upper floor windows, the approved scheme allowed for the modern windows with 3 over 6 timber sash windows. The revised scheme looks to replace with 9-part timber casement windows. Casement windows to the upper floor and rear elevations were the general design of the window as they were cheaper to construct and reflected the social hierarchy of the house. The proposed replacement with casement windows is therefore acceptable.

Alterations to the windows on the side (west) elevation

The approved scheme proposed to change the existing window on the first floor and the proposed top floor (04 on the drawing) with aluminium windows of two unequal windows. These windows overlook the adjacent property (tea rooms) and would be evident within the street view. It is not clear why this is proposed, but the proposed window scale and form is contemporary and out of character with the host building, and the character of the conservation area. These should be replaced with either the approved design, or an alternative solution proposed that is in keeping with the historic environment.

The window within the gable end was proposed to be opened up and a traditionally detailed sash window inserted. The revised scheme looks to replace the proposed window with a fixed casement window, which is considered to be acceptable.

Alternative rear dormer

The submitted Heritage Statement advised that '*As part of the development of the construction design, a more detailed survey was undertaken and in addition, new requirements under Part L of the Building Regulations have come into effect. The result of which means that the pitch of the dormer has been reversed, increasing the height of the dormer towards the rear. This height is still below the existing ridge.*' However, the proposed and approved drawings show that the bulk of position of the rear dormer are the same, both sit just below the ridge line and both sit the same within the floor plans. Therefore, from the information provided, it is unclear what the proposed changes are.

Alterations to the rear glazing

The proposed scheme looks to reduce the extent of the glazing to the rear elevation, which is considered to reduce the impact on the character of the building, and the setting of the listed buildings.

Proposed rear elevation

There are some amendments proposed to the rear elevation, which increase the extent of exposed stonework and reduce the glazing area. This is supported.

Lower Level Plan

The submitted application proposes minor changes to the staircase to provide access to the rear. This is considered to cause no impact on the significance of the listed building.

To the rear of the building, there is an amendment to the layout of the fire escape to the rear garden from the bedrooms. This requires the removal of some walls, and it is unclear from the information provided the possible age of the fabric. At the site visit, it was evident that there are some rubble stone walls with brick above, which relate to the historic rear wall of the building. It is unclear why this amendment has been proposed. However, the principle of the removal of the fabric has been approved, and therefore it is considered acceptable.

As part of these changes, it is proposed to relocate the door between levels which requires the loss of part of a wall. It is unclear from the information provided the possible age of the fabric, but the wall forms the rear elevation of the original building, and its loss raises concerns. As it is masonry, it will require some additional structural works (not specified) and has the potential for further harm. It is unclear why this doorway needs to be relocated as there appears to be sufficient room to create the staircase without the adjustment.

The proposed plans insert an additional feature walkover rooflight in the dining/ garden room. It is unclear if this would result in any loss of historic fabric from the information provided. At the site visit, it was noted that much of the rear is of modern fabric, and therefore this is not considered to cause harm.

Upper Level Floor

The submitted application proposes altering the proposed floor plan by creating an open store to the rafters, altering the staircase, adding in staircase to connect the levels, relocating the en-suite and position and scale of the rooflight. Externally the layout to the courtyard changes to insert an additional staircase and to create a feature rooflight. These changes are not discussed in the submitted application, but relate to the modern fabric and form, and therefore are not considered to cause harm to the significance of the building.

The placement of the en-suite allows the grouping of the services and is supported as this would reduce the impact on the existing fabric.

Proposed Loft and Roof Plan

The approved scheme allowed for this space to be used as a bedroom with a void over the dressing area. There are minor proposed alterations, but nothing of significance.

General

The issues this application addresses have been raised due to Building Regulations, and this should have been part of the initial design process together with an understanding of the significance of the building. Whilst it is acknowledged that some aspects of a listed building are unknown due to the extent of existing fabric or issues revealed when opening up is undertaken, this property is an open shell, and therefore much of these issues could have been considered and resolved within the initial design.

The revised scheme offers several small changes that have not been discussed within the submitted Heritage Statement; with a majority relating to the modern fabric and form, but other aspects, such as the

front elevation windows have the potential to cause harm to the significance of the listed building, the setting of the adjoining listed buildings and the character of the conservation area. The majority of works are not considered to cause any further harm than the approved scheme, but where there is harm, apart from the front elevation windows, this is outweighed by bringing the building back into use. The creation of top hung windows is considered alien, and while they are proposed for the correct intentions, they will be noticeable different and at odds with the street scene. This element of the scheme is not supported and should be amended to ensure a more sympathetic solution is offered.

Summary of Changes Required

- Review of front elevation windows and proposed alternative solutions or revert to the approved scheme
- Retain existing opening within the internal wall on lower level

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 proposals will result in harm to the building via the proposed changes to the front elevation windows and the further loss of historic fabric with the relocation of the opening on the lower level. The proposals involve only part of the building and could therefore be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF, but they involve the front elevation and should not be seen as being of lesser consequence. Indeed, the wording of the NPPF and the 'special regard' by Sections 16 and 66 of the Act requires that any level harm caused should be taken seriously.

Whilst paragraph 215 allows that a level of harm may be offset by public benefits, which could include conservation benefits, in this case no objective justification has been provided for the works and it has not been demonstrated that the works will result in any public benefit. As a result, the proposals fail to meet with the requirements of current conservation legislation, policy or guidance and I therefore recommend refusal.