Wiltshire Council

Wiltshire Council Planning Consultation Response

23rd June 2026

Helen Garside
Principal Conservation Officer
Wiltshire Council Conservation (Central)

Officer's Name: Steve Sims
Officer's Title: Senior Planning Officer

Application No: **PL/2026/02943**
Outline application (with all matters reserved except for access) for the erection of up to 224 residential dwellings (Class C3), 72-bed care home (Class C2), with sports pitch provision, country park, allotments, landscaping and open space.
Land off Trowbridge Road, Bradford on Avon

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

Recommendations:

X	Comment
	No objection
	Support subject to conditions (as set out below)
	Object (for reasons set out below)

Scope of comments: The following comments relate to the conservation of the built historic environment. Other issues, such as those relating to the impact on the wider landscape in general and to below ground archaeological deposits will be subject to consideration by other colleagues within the Council whose specific disciplines relate more closely to these issues.

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. Section 66 (PP) requires 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.

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.

National Planning Practice Guidance provides guidance on interpreting the NPPF.

Historic England publication "The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3" (HE GPA3) notes that "The importance lies in what the setting contributes to the significance of the heritage asset or to the ability to appreciate that significance."

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." It is also required that distinctive elements of Wiltshire's historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced.

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."

Proposals: the application is an outline proposal for a residential development including a care home and approx. 224 residential units with associated infrastructure works and open space including new parkland.

Issues: impact on the settings of nearby designated and non-designated buildings and structures of heritage significance, impact on the conservation area.

Information considered/provided:
Cotswold Archaeology – Historic Environment Desk Based Assessment and Geophysical Survey CR0419_4 April 2026
Illustrative Layout ref. 250310 L 02 03 Feb 2026

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 the above referenced "Historic Environment Desk Based Assessment and Geophysical Survey" 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. I am generally in agreement with the findings of the Statement in so far as it identifies both designated and non-designated assets likely to be impacted by the proposed development and describes their significance and the contribution that the site makes to this.

Site and history: the site comprises an area of largely level agricultural land to the south of Bradford on Avon which is accessed from Trowbridge Road. One of the fields is regularly used for camping but otherwise they are undeveloped.

The site contains no major standing heritage – however, there are three listed heritage assets in close proximity to the site. A Grade II listed milestone, lies adjacent to the site to the west, alongside Trowbridge Road, the Grade II listed Widbrook Bridge over the Kennet and Avon Canal lies to the south-west, and the Grade II listed Widbrook Farmhouse lies across the main road, to the south of the Site.

I agree with the Heritage DBA that the significance of the listed milestone lies with its historic function, continuing legibility and association with the road and that that these will not be impacted by the development of the site. I also agree that site is sufficiently separated from Widbrook Farmhouse such that the agricultural setting within which it is understood and experienced will remain unaltered. I have therefore not considered these designated assets further.

The construction area is not included within a designated conservation area but the Bradford on Avon conservation arear lies a short distance to the north-west, separated by intervening housing. At the roadside edge this housing dates from the C19 and the earlier C20, with areas of post-war housing to the rear to the

north-east. The earlier buildings - semi-detached villas to the north and C19 vernacular terraces to south of the road are constructed in a style and materials which are characteristic of Bradford on Avon and evidence the spread of the town at these periods via sporadic ribbon development along the approach roads. To the south-east of the site a small cluster of C19 vernacular buildings, including the Beehive public house, are associated with the canal crossing (via the Grade II listed Widbrook Bridge) and the passing trade which resulted at this junction of transport routes, and are equally characterful. Both sets of buildings are identified within the Historic Environment DBA as non-designated heritage assets and I agree with this assessment.

Significance of assets and contribution of setting (as appropriate): 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." In this case the key issue lies with the contribution that the site makes to the significance of nearby designated and non-designated assets to the south and north on Trowbridge Road – primarily as part of the rural setting within which they are experienced and with the sense of separation that the site provides from the urban areas of the town.

Assessment: I am in agreement with the Historic Environment DBA that the development of the site in depth will result in a level of harm to both sets of assets discussed above via the loss of the rural backdrop or foreground within which the assets are experienced and, for the group around the bridge which includes the listed bridge, also in the loss of the sense of separation from the town. Given that there will be no direct impact on the assets and for the most part that they are largely non-designated and relatively of lesser significance, that harm can be considered to lie within the scale of less than substantial harm for the purposes of interpreting the NPPF and at the lower end of that scale. Of the two, the harm to the group around the Grade II listed Widham Bridge is the more significant.

Whilst a residential layout might offer opportunities for mitigation via a high-quality design in character with the existing historic ribbon development, the illustrative plan suggests that the care home element of the scheme will occupy this part of the site and will be sited close to the roadside edge, covering roughly half of length of the roadside boundary. The scale, bulk and massing of such a facility is likely to exacerbate the harm that will be caused by the development of the site, appearing as a dominant and discordant feature in the street scheme which is out of character with this transitional edge of town location between the more urban form of the ribbon development stretching outwards from the town and the more rural group associated with the canal which includes the listed bridge.

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, the proposals would result in some harm at the lower end of the scale to the group of heritage assets clustered around the listed bridge and associated with the transport junction formed by the canal and road and with the non-designated residential heritage assets at the edge of Bradford on Avon. This harm would result from the development of a site which currently contributes to the setting of these assets as a significant rural/agricultural gap and which provides the context within which they are experienced. The illustrative layout suggests that opportunities for minimising this harm via an appropriate layout and design which seeks to conserve the character of the area and setting of the town and assets will not be pursued.

In due course it will fall to the Case Officer to assess the benefits which will accrue and to weigh these against the modest level of heritage harm which will be caused and any other planning constraints and to reach a view on the final planning balance. During this process close scrutiny should be given to the level and nature of the need and the opportunities for providing public benefits which are required, either elsewhere on other sites which would have a lesser adverse impact, or via development of an amended scope or form.

It is understood that the current site has not been identified within the continuing exercise to allocate housing sites for a new Local Plan, which has included not only consideration of the appropriate location for housing at a strategic level but also testing of sites against environmental constraints, including the impact on heritage.