# Heritage Desk-Based Assessment

## Former RAF Rudloe No.2, Westwells Road, Corsham, SN13 9RA

On behalf of Taylor Wimpey Bristol

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# 1. Introduction

1.1. Pegasus Group have been commissioned by Taylor Wimpey Bristol to prepare a Statement to consider land known as *Former RAF Rudloe No.2, Westwells Road, Corsham, SN13 9RA* (hereafter 'the Site'; ***Plate 1***).

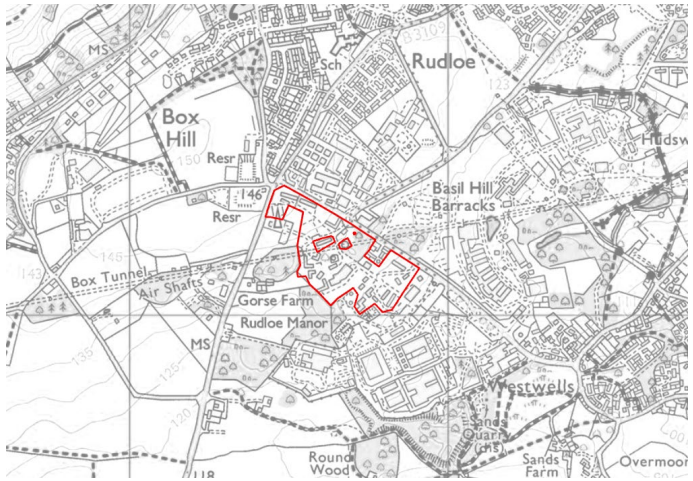



*Plate 1: Site location plan*

1.2. The Site comprises the former RAF Rudloe No. 2 site, a former military barracks established in the 1940s. There are no above ground designated heritage assets situated within the Site; however, the 'Listed Buildings point' for the Grade II* murals within the belowground 'MOD Corsham: Quarry Operations Centre (QOC)', as recorded on the National Heritage List for England is positioned adjacent to the Site boundary, with it understood that tunnels within which the murals are located extend beyond the point and beneath the Site.

1.3. Full Planning Permission is sought for the redevelopment of the Site as follows: *"Erection of 167no. dwellings, creation of access, public open space, infrastructure and associated works."*

1.4. This Report provides information with regards to the significance of the historic environment to fulfil the requirement given in paragraph 207 of the Government's *National Planning Policy Framework* (the *NPPF*) which requires:

***"...an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting".***[1]

1.5. In order to inform an assessment of the acceptability of the scheme in relation to impacts on the historic environment, following paragraphs 212 to 216 of the *NPPF*,

[1] Ministry of Housing, Communities and Local Government (MHCLG), *National Planning Policy Framework (NPPF)* (London, December 2024), para. 207.

any harm to the historic environment resulting from the proposed development is also described, including impacts on significance through changes to setting.

1.6. As required by paragraph 207 of the *NPPF*, the detail and assessment in this Report is considered to be "*proportionate to the assets' importance*".[2]

**Pre-Application Engagement**

1.7. A Pre-Application enquiry regarding the proposed development was issued to Wiltshire Council in January 2026, with a meeting held between members of the Project Team and Wiltshire Council onsite in February 2026.

1.8. Formal pre-application advice was received on 2nd March 2026 (ref. ENQ/2026/00100). Regarding heritage, the pre-application response sets out the following:

***"Policy CP58 of the WCS requires development to protect, conserve and, where possible, enhance the historic environment, including the character and setting of heritage assets. This reflects the approach in Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and paragraphs 212–221 of the NPPF. Where harm to a heritage asset is identified, there must be clear and convincing justification.***

***On site you explained to me that the developer has the rights to the first 7 metres below ground level only. I set this out because <u>much of the historic interest at the site is subterranean relating to the Box Tunnel and historic MoD features</u>.***

***I have consulted with the council's archaeology team and they have set out that an updated Archaeological Desk-based Assessment should be provide with any formal application given the length of time since the 2014 assessment was compiled. This document should assess all known heritage assets within the site and up to 1km from its boundary, place the site within its local archaeological context, assess the archaeological potential of the site itself and the likely impact of the proposed development upon buried remains. It should also assess the impact on archaeological potential from 20th-century development of the site.***

***CP37 is clear that the historic and cultural interest of the military use needs to be understood and used to inform the development. The <u>layout reveals some of the known features of the site quite well</u> in my opinion, but I would welcome more information in your Heritage Statement and/or Design and Access Statement to show how you are addressing this matter. I reiterate the need to be clear on how those parts excluded from the application site will be integrated and expressed within the proposed scheme.***

***Finally, I note that the development plan at paragraph 5.62 sets out that the former MoD underground sites in the area are of international importance and development should accord with the Historic***

[2] MHCLG, *NPPF*, para. 207.

***Partnership Agreement (HPA) for the management of these sites. You need to address this.***

***In summary, heritage is an important matter here and an appropriate level of information to allow a suitable assessment to be made on the impact of the proposals on the significance of all heritage matters is necessary in order to demonstrate compliance with CP37, CP58 and the NPPF." (our emphasis)***

1.9. This Heritage Statement provide the assessment requested at pre-application stage, and considers both archaeology and built heritage matters. Discussion on the policies set out above, from a heritage perspective, is provided where relevant.

# 2. Site Description and Planning History

**Site Description**

2.1. The Site comprises c.8ha of land at the former RAF Rudloe No.2 site on the western edge of Corsham.

2.2. Westwells Road bounds the Site to its northern and eastern boundaries, beyond which is residential development. The southern boundary adjoins further open land, while to the west the Site transitions to additional open countryside and woodland, which form part of the wider rural landscape.

2.3. The Site has been fully decommissioned and now contains a mix of vacant and underutilised buildings, concrete hardstanding, and areas of open land, including some natural vegetation and tree lines. The irregular elements excluded from the Site's interior red line boundary contain retained and operational MoD infrastructure, including ventilation shafts and fire station.

2.4. The Site represents 'Previously Developed Land' owing to its previous military use, and is included in the Council's Brownfield Land Register under reference N14.11354.

2.5. Photographs of the Site, captured in May 2025, are provided as Plate 3 – Plate 16 below. The photographs are presented in sequence of moving clockwise around the Site from the main access off Westwells Road.

**Planning History**

2.6. In August 2016, Outline Planning Permission for the redevelopment of the Site was granted, comprising "up to 180 Dwellings & Economic Development, Demolition of Existing Buildings & Structures, Car Parking, Open Space, Associated Infrastructure & Access" (LPA Ref. 14/11354/OUT).

2.7. As detailed within the description of development, the Outline application included the demolition of all existing built form situated within the Site.

2.8. The Delegated Report notes that neither the County Archaeologist nor Historic England had any objections to the proposed development, and summarised the heritage resource of the Site and the development impacts as follows:

***"Impact on conservation features and site archaeology***

***Whilst the network of rail and military tunnels beneath the site are of substantial historic significance and include recently designated Grade II* WWII murals, development above ground will not significantly impact upon these. The scheme is designed so as to preserve the status quo in terms of movement between above and below ground, with the existing mineshaft retained by the MoD and excluded from the site.***

***Therefore although in strict terms the site can be said to have heritage value, no harm to this can be***

***attributed to the development and therefore paragraphs 133 and 134 of the NPPF are not engaged in this instance.***

***It is however considered that further stability surveys and method statements will be necessary to ensure that construction does not impact on the physical structures on which the heritage assets are dependent.***

***Given the surrounding practical uses of the tunnels, the scheme does not provide any real opportunity to better reveal the significance of the heritage assets. Nonetheless, this overall approach is consistent with paragraph 132 of the NPPF."***

2.9. As demonstrated above, the principal heritage consideration associated with the Site was considered to be the below ground military tunnels. No concerns were raised regarding the loss of existing former military building within the Site, nor potential impacts on the heritage significance of heritage assets within the surrounds of the Site as a result of a change in 'setting'.

2.10. No conditions relating to archaeology or built heritage were attached to the Outline permission.

2.11. In June 2021, a Reserve Matters application pertaining to the above Outline permission was granted (LPA Ref. 19/07339/REM). The layout approved under the Reserve Matter application is detailed at Plate 2.



*Plate 2: Layout for the redevelopment of the Site as approved under LPA Ref. 19/07339/REM.*

2.12. In considering the Reserve Matters application, the Archaeology Officer confirmed that they had no comments to make, while the response from the Conservation Officer was as follows:

***"As the site lies above the grade II* murals and scheduled tunnels, please ensure that neither drainage or services will be installed at such a depth as to break through or intrude on the below ground heritage.***

***-That no water storage will be in an area that it may impact on the below ground heritage either by excess weight or leaking.***

***-That the existing ventilation to the underground space is maintained and not impeded by any of the new development."***

2.13. No conditions relating to archaeology or built heritage were attached to the 2021 planning permission.



*Plate 3: Looking south along the site access from Westwells Road, with Building 29 on the left hand side and the Fire Station directly ahead.*



*Plate 4: Looking north-east towards Building 30*



*Plate 5: Looking north-west towards Buildings 27 and 28*



*Plate 6: Looking north towards Building 26*



*Plate 7: Looking south-west towards Building 19*



*Plate 8: Looking north-west from the terminus of a site road at the south-eastern boundary of the Site, towards Buildings 20 (far left), 18 and 19 (centre) and 23 (right)*



*Plate 9: Looking south-west past Building 1 (left) towards Building 7 (right of centre)*



*Plate 10: Looking east towards part of Building 2*



*Plate 11: Looking north-west towards part of Building 8*



*Plate 12: Looking south towards part of Building 10*



*Plate 13: Looking south-east towards Building 12*



*Plate 14: Looking north towards Building 14*



*Plate 15: Looking north-east towards Buildings 30 (background) and 31 (foreground)*



*Plate 16: Looking south towards Building 34 from Westwells Road*

# 3. Methodology

3.1. The aims of this Report are to assess the significance of the heritage resource within the Site and study area, to assess any contribution that the Site makes to the heritage significance of the identified heritage assets, and to identify any harm or benefit to them which may result from the implementation of the development proposals, along with the level of any harm caused, if relevant.

**Sources**

3.2. The following key sources have been consulted as part of this assessment:

- The National Heritage List for England for information on designated heritage assets;
- The Wiltshire Historic Environment Record (HER) for information on the recorded heritage resource within the vicinity of the Site;
- Historic maps available online through The Genealogist, National Library of Scotland, and Know Your Place websites;
- Historic aerial photographs available online through the Historic England Aerial Photo Explorer and Britain From Above;
- The Corsham Characterisation Study (Oxford Archaeology 2008);
- The Asbestos Inspection Report for all upstanding structures within the Site (Greenshield Environmental 2016);
- The Ground Investigation Report (Hydrock 2016) and the Supplementary Ground Investigation Report (Rodgers Leask Ltd 2025); and
- Other online resources including The Rural Settlement of Roman Britain database, Ordnance Survey Open Source data, geological data from the British Geological Survey and Cranfield University's Soilscapes Viewer, and Google Earth satellite imagery.

3.3. For digital datasets, information was sourced for a 1km study area measured from the redline boundary of the Site. Historic cartographic sources were reviewed for the Site and beyond this where professional judgement deemed necessary. Heritage assets in the wider area were assessed as deemed appropriate (see ***Section 6***).

3.4. Information gathered is discussed within the text where it is of relevance to the potential heritage resource of the Site. A gazetteer of recorded sites and findspots is included as ***Appendix 1*** and figures illustrating key data and reproductions of historic maps are included as ***Appendix 2***.

**Site Visit**

3.5. A Site visit was undertaken by a Heritage Consultant of Pegasus Group on 28th May 2026.

3.6. The upstanding buildings and open areas were inspected only from the tarmac roads through the Site and from Westwells Road and Bradford Road outside the Site. The interior and close curtilage of buildings, and the grassed and wooded areas, were not accessed on account of the reported risk of potential asbestos containing materials (including surface debris from demolished buildings); potential unmapped and uncapped air shafts; and other risks associated with ground conditions. Basic descriptions and photographs of all the extant buildings within the Site are provided in ***Appendix 9***.

3.7. Designated heritage assets within the wider study area were inspected from the publicly accessible areas.

**Photographs**

3.8. Photographs included in the body text of this Report are for illustrative purposes only to assist in the discussions of heritage assets, their settings, and views, where relevant. Unless explicitly stated, they are not accurate visual representations of the Site or development proposals nor do they conform to any standard or guidance i.e., the Landscape Institute Technical Guidance Note 06/19. However, the photographs included are intended to be an honest representation and are taken without the use of a zoom lens or edited, unless stated in the description or caption. All photographs were captured in 2025 unless stated otherwise.

**Assessment Methodology**

3.9. Full details of the assessment methodology used in the preparation of this Report are provided within ***Appendix 3***. However, for clarity, this methodology has been informed by the following:

- *ClfA's Standard and Guidance for Historic Environment Desk-Based Assessment*;[3]
- *Historic Environment Good Practice Advice in Planning: 2 - Managing Significance in Decision-Taking in the Historic Environment* (hereafter *GPA:2*);[4]
- *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) - The Setting of Heritage Assets*, the key guidance of assessing setting (hereafter *GPA:3*);[5]
- *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (hereafter *HEAN:12*);[6] and

[3] Chartered Institute for Archaeologists (ClfA), *Standard and Guidance for Historic Environment Desk-Based Assessment* (revised edition, October 2020).
[4] Historic England, *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment (GPA:2)* (2nd edition, Swindon, July 2015).
[5] Historic England, *Historic Environment Good Practice Advice in Planning Note 3 - The Setting of Heritage Assets (GPA:3)* (2nd edition, Swindon, December 2017).
[6] Historic England, *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets (HEAN:12)* (Swindon, October 2019).

- *Conservation Principles: Polices and Guidance for the Sustainable Management of the Historic Environment*.[7]

[7] English Heritage, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008).

# 4. Policy Framework

**Legislation**

4.1. Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and their settings and Conservation Areas.[8]

4.2. Scheduled Monuments are protected by the provisions of the *Ancient Monuments and Archaeological Areas Act 1979* which relates to nationally important archaeological sites.[9] Whilst works to Scheduled Monuments are subject to a high level of protection, it is important to note that there is no duty within the 1979 Act to have regard to the desirability of preservation of the setting of a Scheduled Monument.

4.3. In addition to the statutory obligations set out within the aforementioned Act, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.[10]

4.4. Full details of the relevant legislation are provided within ***Appendix 4***.

**National Planning Policy Guidance**

4.5. National Planning Policy guidance relating to the historic environment is provided within Section 16 of the Government's *National Planning Policy Framework* (*NPPF*), the latest version of which was published in December 2024. The *NPPF* is also supplemented by the national *Planning Policy Guidance* (*PPG*) which comprises a full and consolidated review of planning practice guidance documents to be read alongside the *NPPF* and which contains a section related to the Historic Environment.[11] The *PPG* also contains the *National Design Guide*.[12]

4.6. Full details of the relevant national policy guidance are provided within ***Appendix 5.***

**Local Development Plan**

4.7. Applications for Planning Permission in Wiltshire are currently considered against the policy and guidance set out within the Wiltshire Core Strategy (adopted 2015). Details of specific policies relevant to the development proposals are provided within ***Appendix 6.***

[8] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.
[9] UK Public General Acts, *Ancient Monuments and Archaeological Areas Act 1979*.
[10] UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

[11] Ministry of Housing, Communities and Local Government (MHCLG), *Planning Practice Guidance: Historic Environment (PPG)* (revised edition, February 2024), https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment.
[12] Ministry of Housing, Communities and Local Government (MHCLG), *National Design Guide* (London, January 2021).

# 5. Proposed Development

5.1. Full planning permission is sought for the comprehensive redevelopment of the Site including the demolition of existing built form and the construction of 167no. residential units, together with associated public open space, access and all supporting infrastructure.

5.2. The residential envelope is to be separated into two distinct parcels, with the retained MoD fire station (outside of the redline) remaining in the central part of the Site.

5.3. The two areas of residential development will be separated by an extensive area of public open space, incorporating pedestrian/cycle connectivity. This area reflects the intervening route of the Box Tunnel, as situated beneath the Site, together with other MoD subterranean infrastructure. The red line also circumvents retained air ducts in the latter respect, and thus there would be not physical impacts to these.

5.4. The proposals are detailed on the following plans which form the application package and which this assessment considers:

- SL.01_A Site Layout
- SS.01_A Street Scenes
- ML.01_A Materials Layout
- CSL.01 A Coloured Site Layout
- 25223.101 LANDSCAPE STRATEGY REV A

5.5. The Proposed Site Layout (DWG No. CSL.01 A), an extract of which is included at Plate 17, demonstrates that the overall arrangement of the proposed development is materially similar to that approved under the previous Reserve Matters application (see Plate 2).



*Plate 17: Extract from the Proposed Layout Plan (DWG No. SL.01_A).*

# 6. Historic Environment Baseline and Archaeological Resource

6.1. This Section provides a review of the recorded heritage resource within the Site and its vicinity in order to identify any extant heritage assets within the Site and to assess the potential for below-ground archaeological remains within the Site.

6.2. Designated heritage assets are referenced using their seven-digit NHLE number. Wiltshire HER records are referenced using their EvUID and MonUID, prefixed EWI and MWI respectively.

6.3. Relevant heritage data is presented in a gazetteer in ***Appendix 1*** and illustrated in ***Appendix 2***.

**Topography and Geology**

6.4. The land of the Site slopes from *c.*147m aOD in the far north-western corner (bounded by Bradford Road to the west and Westwells Road to the north) to *c.*122m aOD in the far south-eastern corner.

6.5. The recorded bedrock geology of the Site comprises limestone of the Forest Marble Formation in the north-west, and mudstone of the Forest Marble Formation elsewhere; no superficial geological deposits are recorded by the BGS[13].

6.6. The recorded soils of the Site comprise shallow lime-rich soils over chalk or limestone[14]. These are mapped over the entire Site, despite only a small area being recorded as limestone by the BGS.

6.7. The on-site stratigraphy was established by ground investigations undertaken by Hydrock in 2016 (***Table 1***); topsoil with made ground was recorded to depths of between 0.10m bgl to 2.10m bgl across the trial pits.

*Table 1: Stratigraphy for the Site (after Hydrock 2016)*

| Stratum | Depth to top (m bgl) | Depth to base (m bgl) | Thickness (mm) |
|---|---|---|---|
| Topsoil | Ground level | 0.10 – 0.25 | 0.10 – 0.25 |
| Made Ground | 0.10 – 0.25 | 0.30 – 2.10 | 0.20 – 1.85 |
| Destructured Forest Marble Limestone Formation | 0.30 – 0.40 | 1.25 – 1.60 | 0.90 – 1.20 |
| Residual Forest Marble Formation (Mudstone) | 0.30 – 2.10 | 1.10 – 3.20+ | 0.25 – 2.30 |

[13] British Geological Survey, *Geology of Britain Viewer*, https://www.bgs.ac.uk/map-viewers/geology-of-britain-viewer/

[14] Cranfield University, *Soilscapes*, http://www.landis.org.uk/soilscapes/

| | | | |
|---|---|---|---|
| Forest Marble Limestone Formation | 1.25 – 1.60 | Not proven | Not proven |
| Forest Marble Formation (Mudstone) | 1.10 – 3.20+ | Not proven | Not proven |

**Previous Archaeological Works**

6.8. HER 'events', relating to previous archaeological works, are illustrated on ***Figure 2***.

6.9. The desk-based assessment prepared to support the 2014 Outine application is not recorded by the HER.

6.10. The Site is however included in three large polygons mapped by the HER for the following:

- A 2007 building survey of the telecommunications equipment in the Corsham Quarry Tunnels (EWI7226);
- A 2008 desk-based assessment of the Corsham Quarry Tunnels (EWI7225); and
- A 2010 management survey for MOD Corsham (EWI7147).

6.11. Land at Basil Hill Barracks, on the opposite (north) side of Westwells Road to the Site, was subject to an archaeological evaluation in 2007 for the Corsham Development Project (EWI6711).

6.12. Land between Bradford Road and Bath Road, *c.*750m north of the Site at its closest point, was subject to a geophysical survey in 2024 (EWI10907).

6.13. The results of selected previous archaeological works are discussed below, where relevant to assessing the known and potential buried archaeological resource of the Site.

**Archaeological Baseline**

6.14. HER 'monument' records are illustrated on ***Figure 3*** and ***Figure 4***.

<u>Prehistoric (pre-43 AD and Romano-British (AD 43 - 410)</u>

6.15. The only confirmed evidence of prehistoric activity within the study area comprises the findspot of a Bronze Age palstave axe found within Box Tunnel, either in or before 1956, *c.*150m north-east of the Site (MWI1679).

6.16. Elsewhere, possible prehistoric to Romano-British origin may be indicated by undated cropmarks seen on aerial photographs captured in 1971. Roughly midway between Rudloe Manor and Hazelbury Manor, *c.*640m and *c.*820m west-south-west of the Site, are two oval enclosures (MWI1812, MWI1813); while at Lower Rudloe Farm, *c.*890m and *c.*1km north-north-west of the Site, are two square enclosures (MWI2348, MWI2354).

6.17. Undated ditches were also detected in the vicinity of the Rudloe/Hazelbury enclosures, *c.*900m-1.2km west-south-west of the Site, by a geophysical survey undertaken in 2022 ahead of the installation of a pipeline (MWI78265).

Early medieval (410 AD – 1066) and Medieval (1066 – 1539)

6.18. No archaeological evidence of early medieval activity is recorded within the study area.

6.19. There are, however, entries for Corsham and Hazelbury in the Domesday Survey of 1086AD. The entry for Corsham, which also included Poulshot, gives a population of 70.5 households, putting it in the largest 20% of settlements recorded in Domesday. Its lands and resources included ploughlands, meadow, pasture, woodland, two mills and two churches.

6.20. Hazelbury meanwhile had a population of 25 households, putting it in the largest 40% of settlements. Its resources included a church, which is known from later records to have been demolished in 1476 AD. The HER maps the area of deserted medieval settlement in a field *c.*260m north of the present-day Hazelbury Manor, *c.*900m south-west of the Site (MWI1765).

6.21. The HER identifies four other settlements with medieval origins within the study area:

- Rudloe House, *c.*375m north of the Site, recorded as Riglega in a documentary source of 1167 AD (MWI1783);
- Westwells Farm, *c.*400m south-east of the Site, on the basis of a documentary record of a William de Westwell in 1305 AD (MWI1706);
- Jaggards, *c.*700m south-east of the Site, on the basis of a documentary record of a Henry Jagard in 1327 AD (MWI1707); and
- Pockeridge Farm, *c.*980m north-east of the Site, on the basis of a documentary record of a Henry de Poltrigge in 1327 AD (MWI1704).

6.22. A hoard of medieval coins associated with the reign of Stephen and Matilda was found at the very western edge of the study area, *c.*1km west of the Site, through metal detecting in 1994 and 1995 (MWI1786).

Post-medieval (1540 – 1750) and Modern (1750 – 1939)

6.23. The extant farmsteads of Westwells (MWI68551) and Jaggards (MWI68550), as mentioned in the previous section in the context of medieval settlements, are both of 17th-century origin.

6.24. An area of earthworks interpreted as the remains of a possible post-medieval field system is recorded to the north of Hudswell, *c.*910m-1.1km north-east of the Site (MWI79823, MWI74178).

6.25. Between 1838 and 1841, the Great Western Railway constructed a 3km-long tunnel through Box Hill, for the main line from London to Bath (MWI79614, MWI78874). A *c.*240m length of Box Tunnel passes under the Site, just north-west of centre, on an east-north-east/west-south-west alignment. The tunnel is not visible from ground level within the Site.

6.26. Box Tunnel was built from Bath stone, sourced from a number of nearby underground quarries: Clift Quarry, Tunnel Quarry, and Spring Quarry (MWI77276, MWI77299, MWI77300; see below). The HER has mapped the quarries (MWI31707), as well as the tramways that connected with the railway line (MWI76057). Almost all of the central and eastern areas of the Site were part of Spring Quarry, while

the south end of Tunnel Quarry extended across the northern boundary, and a smaller area in the north-west was part of Groundstone Quarry (***Plate 18, Plate 19***). The closest tramway lies *c.*200m north-east of the Site (***Figure 3***).

6.27. The HER maps air shafts and associated spoil heaps for Box Tunnel on land immediately west of the south-western boundary of the Site, as well as on land on the north side of Westwells Lane *c.*25m north of the Site (MWI73488; ***Figure 3***). Both areas are now occupied by mature woodland and were not accessed during the Site visit undertaken for this assessment.

*Historic Map Regression*

6.28. The earliest available detailed mapping of the Site was the 1838 tithe map for the parish of Box (***Figure 5***).

6.29. The tithe map shows the Site to comprise part of three fields, with two buildings and a pond located in the northern part of the eastern field. Two shafts, numbered 5 and 6, are marked along the route of Box Tunnel, in the fields immediately to the west and east of the Site. The tithe apportionment reveals that the land of the Site was attached to Bayliff Farm (later renamed Manor Farm) at Wadswick (***Table 2***).

*Table 2: Information contained in the tithe apportionment for the Site*

| Plot number | Owner | Occupier | Plot name | Land use |
|---|---|---|---|---|
| 406 | Edward Richard Northey & William Brook Northey | John Edwards | Barton and Outbuildings | - |
| 408 | Edward Richard Northey & William Brook Northey | John Edwards | Hungerdown and Three Cornered Piece | Arable |
| 409 | Edward Richard Northey & William Brook Northey | John Edwards | Long Croft | Arable |
| 411 | Edward Richard Northey & William Brook Northey | John Edwards | Part of Great Kites Nest | Arable |

6.30. The next available mapping of the Site is the first edition Ordnance Survey map of 1889 (***Figure 6***). In the years since 1838, the two buildings in the north-east had been demolished, the western and central fields had been amalgamated, and an irregular-shaped plantation had been established in the north and centre. This plantation, together with a smaller oval-shaped plantation outside the south-western boundary of the Site, are collectively identified as 'The Tips Coverts' – the name likely referring to the existence of spoil heaps from the creation of the stone quarries for Box Tunnel. An additional air shaft is now shown within the Site, midway between Nos. 5 and 6 shown on the tithe map. A small reservoir is also marked within the far north-western corner of the Site.

6.31. A few minor changes to the Site are apparent on the third edition Ordnance Survey map of 1923 (***Figure 7***). A new field boundary has been introduced in the far west of the Site, and another extending south from the irregular-shaped plantation in the north and centre of the Site. Beyond the Site, two buildings, identified as Gorse Farm, are shown on the south-western edge of the oval plantation of The Tips Coverts, on the east side of Bradford Road.

<u>First World War (1914-1918), Second World War (1939 – 1945) and Cold War (1947 – 1991)</u>

6.32. The 19th-century Box Tunnel stone quarry workings at Corsham were used for ammunitions storage on a small-scale during the First World War but on a much larger scale during the Second World War (MWI31707). Clearance of quarry debris created spoil heaps, such as the large example at Round Wood, *c.*50-550m south-south-east of the Site (MWI73498; ***Figure 3***).

*Spring Quarry, Rudloe No.2 Site, and Central Government War Headquarters*

6.33. From 1940, part of the 19th-century Spring Quarry, which extended beneath the Site, was repurposed as a large underground aircraft factory (MWI77300; ***Plate 18, Plate 20, Plate 21***). It was known as the Ministry of Aircraft Production (MAP) and was operated by the Bristol Aero Engine Company from 1942 until 1945.

6.34. In 1943, artists Olga Lehmann and Gilbert Wood were commissioned by the factory owner to paint murals in the operations centre of the factory, beneath the northern-central part of the Site (MWI32088). Eighteen murals were painted in the canteen at the west end, eleven in the operations rooms and stores at the east end, and three in the corridors and barracks. The murals have been designated as a Grade II* Listed Building (1409132; ***Figure 1***). The 'Listed Buildings point' for the murals as recorded on the National Heritage List for England is positioned adjacent to the Site boundary; however, as indicated above the murals are situated in various locations.

6.35. At around the same time, barracks accommodation, known as the 'Rudloe No.2 Site', or 'Hostel No.2 Site', was built at the surface of the Site to house 1,000 personnel from the MAP workforce and later the RAF (MWI73497; ***Figure 4***). The HER notes:

***"A large number of the original hostel buildings have survived. About a dozen are on the southern side of the site and others have survived to the north of the site. Other surviving buildings include accommodation blocks, a laundry block, stores and the 'canteen and welfare' building. Opposite the present guard room,***

***one of the hostel blocks houses St Peter's Church. This has recently fallen out of use but it still retains its fixtures and fittings, including painted RAF badges in the window glass."***

6.36. Aerial photographs dated 1940, 1945, and 1946 show more hostel buildings in the south-eastern part of the Site than survive today. Further details of the extant buildings within the Site is provided in ***6.39 – 6.42*** below.

6.37. Rudloe No.2 Site was bought by the government in 1954. Between 1957 and 1959, the north-eastern part of the below-ground Spring Quarry workings was converted for use as the Central Government War Headquarters – intended to accommodate 4,000 military and government staff, including the Prime Minister and key cabinet officials, in the event of nuclear conflict during the Cold War (MWI77300; ***Plate 22***).

6.38. The northern area housed a telephone exchange, stores and plant rooms, while the southern area housed offices, accommodation, and associated facilities. A number of these subterranean structures have been designated as Scheduled Monuments, as follows:

- The Telephone Exchange, *c.*10m north-east of the Site (1409129);
- The Lamson Terminus Room, housing a pneumatic tube internal communication system, *c.*60m east of the Site (MWI79666, 1409121);
- A Radio Station/Studio, *c.*120m east of the Site (MWI79835, 1409123);
- The Prime Minister's Rooms and Operations Rooms, *c.*160m south-east of the Site (MWI79834, 1409131);
- The Canteen and Kitchen, *c.*190m east of the Site (MWI79827, 1409120);
- The Personnel Lifts, *c.*230m east of the Site (MWI79833, 1409130); and
- The Slope Shafts Emergency Exit, *c.*300m east of the Site (1409125).

6.39. Aerial photographs dated 1954 and 1967, and the Ordnance Survey of 1960-61 (***Figure 8***) and 1969 (***Figure 9***), show the above-ground buildings present within the Site and its surrounds in the 1950s and 1960s.

6.40. With reference to the numbered Site plan enclosed as ***Appendix 8***, the following extant buildings occupy the same footprint as those recorded on the 1969 OS:

- Buildings 1-3, 6-8, 10, 11-13, 21-23, 27-28, 30-35.

6.41. Of these, the following are considered to be of 1940s date, on the basis of: historic map and aerial photograph regression (also carried out for the 2008 Oxford Archaeology Characterisation Study), provisional dating provided by the 2016 Greenfield Environmental Asbestos Inspection, and the external inspections of the buildings made during the Site visit for this assessment:

- Buildings 1-2, 10, 12-13, 21-23, 27-28, 30, 32-35.

6.42. Basic descriptions and photographs of all the extant buildings within the Site are provided in ***Appendix 9***.

6.43. A number of buildings are also shown on the 1960-61 and 1969 OS maps that no longer survive. These include:

- Two buildings where there is now a tennis court in the far north-western corner of the Site;
- An L-shaped building between Buildings 30 and 33 in the north-west of the Site;
- An L-shaped building between Buildings 14 and 30, due north of Building 31, in the north-west of the Site;
- An L-shaped building to the north of Building 12 in the centre of the Site;
- A cross-shaped building to the south of the west end of Building 1 in the south of the Site;
- A zig-zag shaped building to the south-east of the east end of Building 1 in the centre of the Site;
- Three buildings in the south end of the Site, in an area now occupied by Buildings 15-20; and
- Six buildings in the south end of the Site, in an area now occupied by Buildings 24-26.

6.44. In 1979, Rudloe No.2 Site's use as Central Government War Headquarters ceased, and it became a communications centre for the RAF from that time until the 1990s when the site was decommissioned.

*Other Second World War infrastructure*

6.45. Across the study area, the HER maps a considerable number of buildings and spoil heaps (deriving from the clearance of the 19th-century stone quarries to make way for ammunitions storage) under monument record MWI74173 (***Figure 4***: orange).

6.46. This record description identifies an association with the military camp known as HMS Royal Arthur. This is said to have included Hostel No.1 and No.2 Sites, the latter lying within the Site (see above). However, the features within the Site are mapped under a separate monument record, as already discussed (***Figure 4***: purple).

6.47. Another hostel site is mapped at Greenhill in the eastern part of the study area, *c.*800m-1.1km east of the Site (MWI73939; ***Figure 4***: cyan). Another hostel site is mapped at Rudloe, *c.*550-825m north of the Site (MWI74174; ***Figure 4***: blue).

6.48. In the north-eastern extent of the study area, in excess of 750m from the Site, the HER maps the earthworks and buildings of the 19th-century Hudswell Quarry and the Royal Army Ordnance Corp Hudswell Camp (MWI73987; ***Figure 4***: dark green).

6.49. A Second World War aircraft obstruction, in the form of two 300m lines of small mounds arranged in a cross-shape, are visible on aerial photographs of land immediately south-west of the Site (MWI74175, MWI74176, MWI74177).

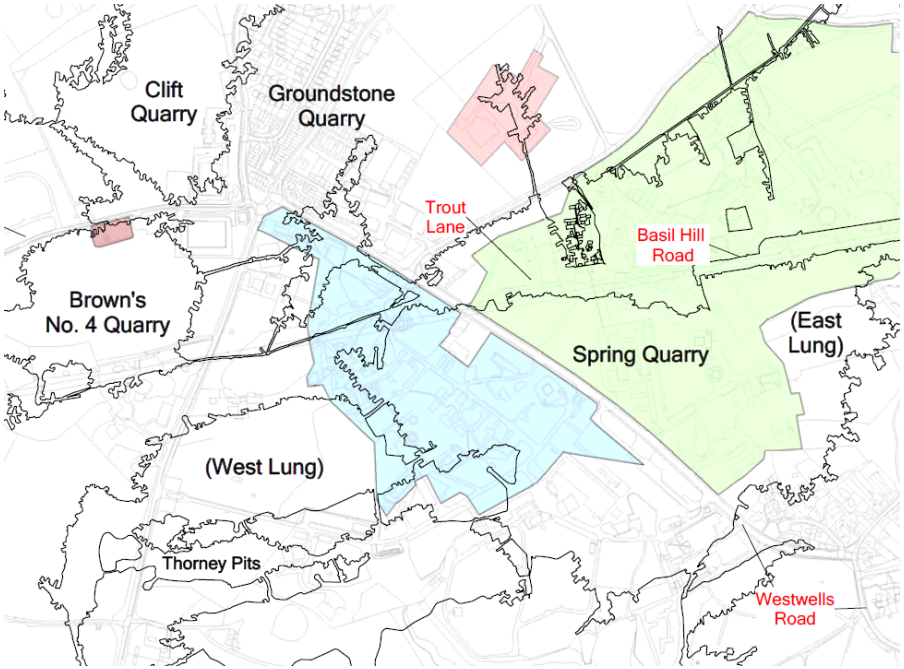



*Plate 18: Extract from OA 2008 Figure 2, showing the 19th-century stone quarries and later MOD surface sites (blue = Rudloe, green = Basil Hill)*

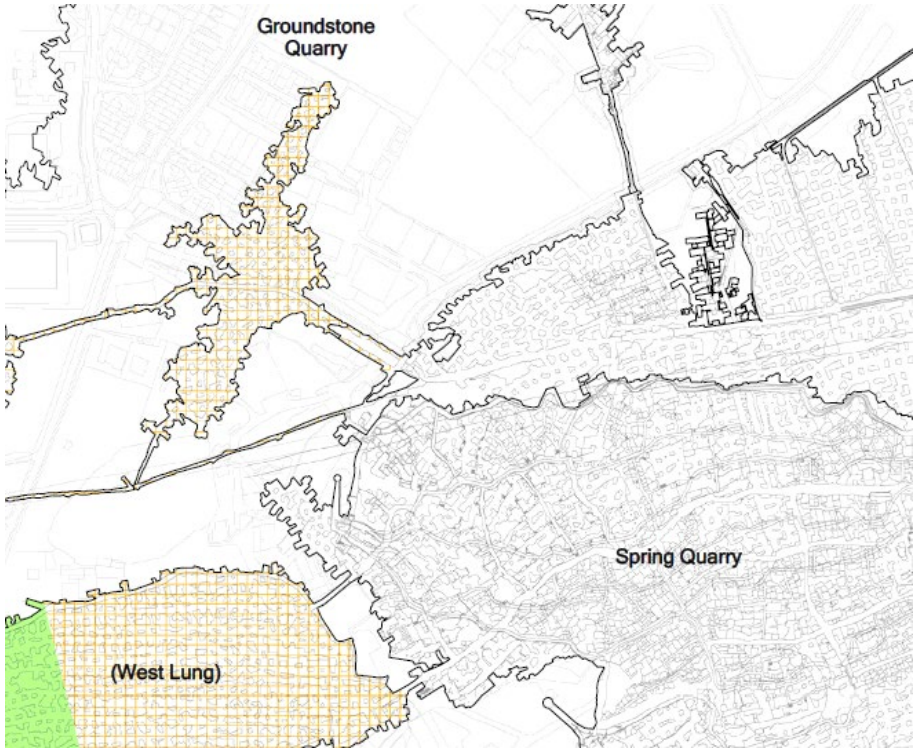



*Plate 19: Extract from OA 2008 Figure 6, with orange hatching indicating areas with potential survival of 19th-century quarry remains*

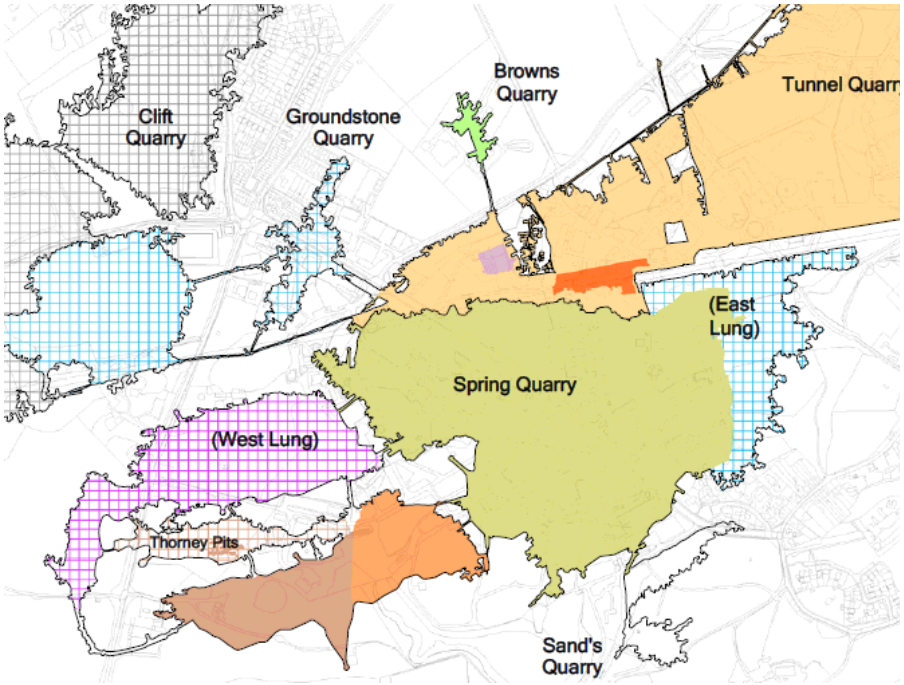



*Plate 20: Extract from OA 2008 Figure 9, showing subterranean uses in 1943 (olive = British Aeroplane Company orange = War Department, blue = ventilation)*

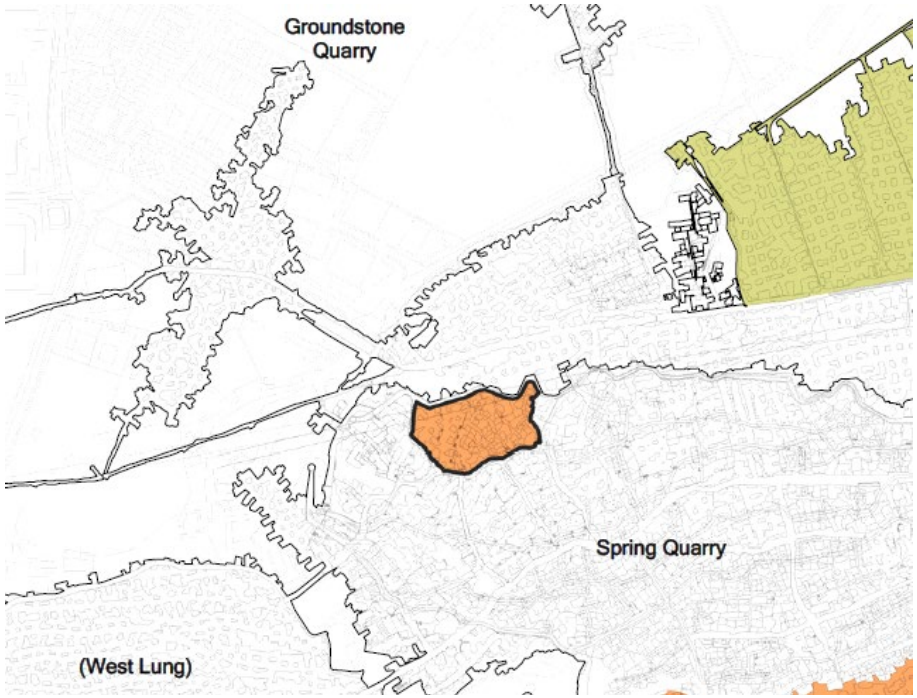



*Plate 21: Extract from OA 2008 Figure 14, with orange shading indicating medium survival of MAP factory remains, and black outline signifying survival of murals*

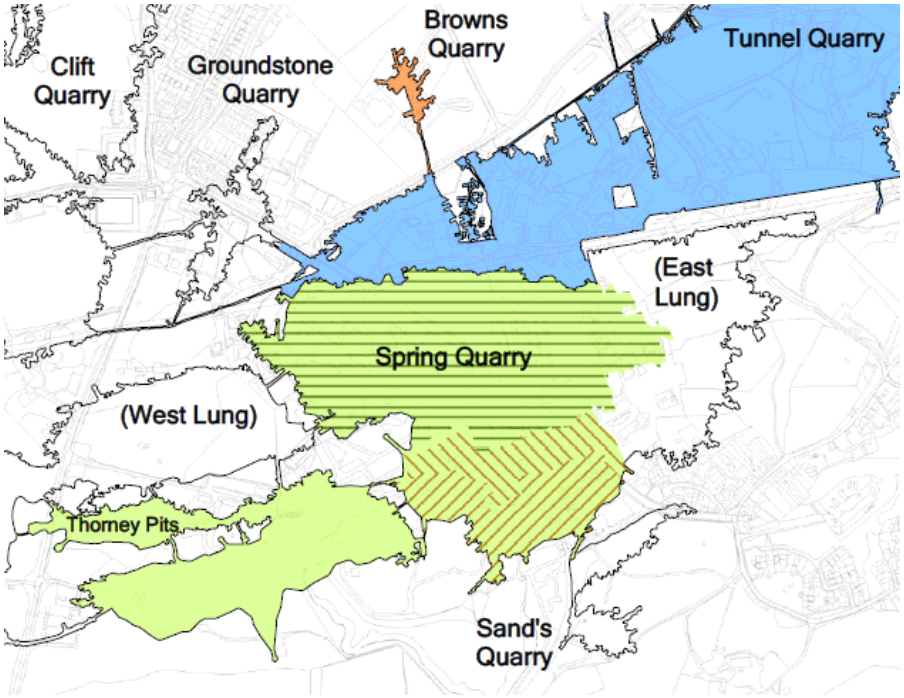



*Plate 22: Extract from OA 2008 Figure 3, with the extent of the Central Government Headquarters shown by light green shading and horizontal darker lines*

# 7. Potential Development Impacts on the Heritage Resource of the Site

**The 'Below Ground' Heritage Resource**

7.1. As set out above, the 'Listed Buildings point' for the Grade II* murals within the belowground 'MOD Corsham: Quarry Operations Centre (QOC)', as recorded on the National Heritage List for England is positioned adjacent to the Site boundary. The murals are situated in various locations within the military tunnels, including in parts of the tunnels (MWI31707) which extend 'underneath' the Site. The military tunnels themselves are considered to represent non-designated heritage assets.

7.2. In addition to the above, part of the Box Tunnel (MWI79614) and the Great Western Railway within its alignment (MWI78874) extends through the Site boundary, again 'underneath' the Site. Box Tunnel is considered to represent a non-designated heritage asset.

7.3. It is considered likely that 19th-century quarrying and tunnelling, and 20th-century construction and demolition activity spanning the 1940s to 1980s, has impacted upon the earlier archaeological resource of the Site. The footprints of now-demolished buildings shown on the OS maps from 1960-61 and 1969 are illustrated on ***Figure 10***.

7.4. There is potential for the buried footings and structural debris of pre-1960s buildings of the Rudloe No.2 Site, which are shown on the Ordnance Survey maps of this date. Indeed, recent ground investigations within the Site have recorded a number of slabs and foundations of demolished buildings below a veneer of topsoil (RLL 2025, 3). Should any footings and debris of Second World War / Cold War surface structures be survive, these would not illustrate anything beyond that already known, and thus are not deemed to have the potential to represent non-designated heritage assets.

7.5. The Corsham Characterisation Study undertaken by Oxford Archaeology identified potential for 19th-century quarry remains only in the north-western corner of the Site (***Plate 19***). Any such remains here would relate to Groundstone Quarry, which was re-used only for ventilation during the Second World War and Cold War. The potential for 19th-century quarry remains elsewhere beneath the Site is very low, as Spring Quarry was much altered for re-use from 1940 onwards. Unmodified quarry workings would be considered at most a non-designated heritage asset of local significance. Any unstratified finds associated with 19th-century quarrying and railway works would not constitute non-designated heritage assets in their own right.

7.6. The Site appears to have comprised farmland throughout the historic periods – including during and after the construction of Box Tunnel from 1838-1842; with two buildings, and a pond, being present in the north-east of the Site by 1838. There is potential for the buried footings of the former *c.*19th-century buildings, (presumed to be agricultural) as well as the infilled pond, former field boundaries and plough furrows. Such remains would typically hold insufficient archaeological or historic interest to be considered even as non-designated heritage assets.

7.7. As set out in **Section 5**, the area above the Box Tunnel, as situated beneath the Site, together with other MoD subterranean infrastructure would comprise an area of open space. The red line also circumvents retained air ducts in associated with the Box Tunnel and wider unground tunnels. The area of open space provides an opportunity for the interpretation and understanding of the military history of the Site and the surrounding area.

7.8. It is understood that the applicant has the rights only to the initial 7m below ground level, with the proposed Site remediation strategy as follows:

- Demolition of the existing buildings, including their foundations and underground services (see further discussion below), and stockpiling the materials within the Site;
- Removal of topsoil from across the Site, and stockpiling this separately;
- Removal of the remaining subsoil from the areas of the Site where 'cutting' is required to reach the proposed formation level; the deepest 'cut' will be no more than 1m; and
- Excavation of foundations into suitable undisturbed geology; these 'cuts' are expected to be on average 2m in depth across the Site.

7.9. As noted in the consultation comments for the 2014 application, the construction methodology of the proposed development would need to ensure that the subterranean structures of the Stone Quarry Tunnels and Box Tunnel – including the areas containing the MOD Corsham Quarry Operations Centre Murals – are not physically impacted upon.

7.10. Based upon the proposed layout and the scope of works set out above, it is considered unlikely any such harm would occur.

7.11. Both surface and intrusive groundworks – for levelling, the excavation of new building foundations, and the installation of drainage, cabling, etc – could destabilise and/or fracture, though physical excavation/drilling and associated vibrations, these structures. This would be mitigated through the detailed construction methodology. When taking into account the previously approved application, it is not considered that the potential for such physical impacts for which appropriate mitigation can be proposed would represent an 'in-principle' constraint to development.

7.12. As set out within the Pre-Application response, one of the matters set out within Paragraph 5.62 of Core Strategy, which sets out supporting text for the consideration 'Specific issues to be addressed in planning for the Corsham Community Area' rather than a specific policy, states that ***"the former MoD underground sites in the area are of international importance and development should accord with the Historic Partnership Agreement (HPA) for the management of these sites."***

7.13. It has not been possible to identify a publicly access copy of the HPA; however, based upon the above, there is no indication that the proposals should conflict with the management of these sites.

**The Potential 'Above Ground' Heritage Resource**

7.14. Basic descriptions and photographs of all the extant buildings within the Site are provided in ***Appendix 9*** (to be read in conjunction with the numbered building plan enclosed as ***Appendix 8***).

7.15. As discussed in **Section 3**, built form within the Site was subject to external inspection only from the tarmac roads through the Site and from Westwells Road and Bradford Road outside the Site. The interior and immediate surrounds of the buildings were not accessed on account of the reported risk of potential asbestos containing materials (including surface debris from demolished buildings), alongside potential unmapped and uncapped air shafts; and other risks associated with ground conditions.

7.16. The following are believed to be original wartime buildings of the Rudloe No.2 Site built in the 1940s to house workers of the underground Ministry of Aircraft Production factory:

- Buildings 1-2, 10, 12-13, 21-23, 27-28, 30, 32-35.

7.17. Onsite assessment has demonstrated that the buildings are of a standard construction for the type and period, and all have been subject to modification in some form.

7.18. Based upon onsite assessment, alongside the consulted HER data and grey literature, there is no indication that the 1940s, or later, military buildings within the Site are of sufficient interest to warrant designation, and this was not a matter raised during the consideration of the previously approved applications for their demolition.

7.19. There is no evidence via the planning history records that the surviving 1940s, or later, military buildings within the Site have previously been identified by the Local Authority as non-designated heritage assets, nor were they expressly identified as such within the pre-application response.

7.20. Furthermore, there is no evidence that concerns were raised regarding their loss in the consideration of previously approved applications for the residential redevelopment of the Site (see ***Section 2***). This considered to be a material consideration.

7.21. Nevertheless, should the Local Authority now come to a differing conclusion, based upon onsite assessment, it is considered that when taking into account the current condition and the standard building types utilised, that the overall heritage significance of the buildings would be low. This would be a material consideration under the Paragraph 216 balance, as would be the poor condition of the buildings and the level of asbestos which they contain; their unsuitability for conversion; and, most importantly, the previous acceptability of their loss in order to deliver a sustainable residential scheme at the Site.

# 8. The Wider Historic Environment

8.1. The following Section provides an assessment of elements of the wider historic environment that have the potential to be sensitive to the proposed development as a result of a change in 'setting'.

8.2. Step 1 of the methodology recommended by *GPA3* (see methodology), is to identify which heritage assets might be affected by a proposed development. [15]

8.3. Development proposals may adversely impact heritage assets where they remove a feature which contributes to the significance of a heritage asset, or where they interfere with an element of a heritage asset's setting which contributes to its significance, such as interrupting a key relationship or a designed view.

8.4. It is however widely accepted (paragraph 220 of the *NPPF*) that not all parts of a heritage asset will necessarily be of equal significance.[16] In some cases, certain elements of a heritage asset can accommodate substantial changes whilst preserving the significance of the asset.

8.5. Significance can be derived from many elements, including the historic fabric of a building or elements of its surrounds.

8.6. Consideration, based upon on-site analysis, archival review, an understanding of the nature of change proposed and professional judgement, was therefore made as to whether any of the heritage assets present within or beyond the minimum 1km study area include the Site as part of their setting, and therefore may potentially be affected by the proposed development.

8.7. Assessment has also taken into account the Zone of Theoretical Visibility prepared by MHP as part of the LVA (see wider application package).

8.8. Designated heritage assets are listed in the gazetteers in ***Appendix 1*** and illustrated on ***Figure 1***; and are summarised as follows:

- One designated heritage asset extends into the Site: the Grade II* Listed Building known as MOD Corsham Quarry Operations Centre Murals, all of which are situated 'beneath' the Site (1409132);
- 22 other Listed Buildings are located within the wider study area, the closest of which is a Grade II Listed Milestone on Bradford Road, *c.*370m south-west of the Site (1022732);
- Eight Scheduled Monuments are located within the study area, the closest of which is the MOD

[15] Historic England, *GPA:3*, p. 4.

[16] MHCLG, *NPPF*, para. 220.

Corsham Telephone Exchange *c.*10m north of the Site (1409129); and

- One Conservation Area is located within the study area, Neston, *c.*780m south-east of the Site at its closest point.

8.9. There are no Registered Parks and Gardens or Registered Battlefields within the study area. The closest Registered Park and Garden is Hazelbury Manor, which lies *c.*1.1km south-west of the Site. There is no indication that the Site forms part of the design intent of the designated landscape, and the Zone of Theoretical Visibility indicates that the Proposed Development would not be visible from the Registered Park and Garden. On this basis, the Registered Park and Garden of Hazelbury Manor is not discussed further. No concerns were raised in regard to the Registered Park and Garden of Hazelbury Manor in the consideration of the previously approved redevelopment of the Site.

Listed Buildings

8.10. The significance of Listed Buildings is predominantly derived from the (special) architectural and historic interest of their built form and fabric.

8.11. An historical association with the Site has been identified only for the Box Tunnel East Portal. The asset comprises a tall stone-built portal at the end of a steep lined cutting for the Box Tunnel, *c.*535m east of the Site. The portal was built in 1836-41 but altered in 1887 to facilitate access to a quarry, and lined and remodelled in brick in 1895 and 1938. The portal does not relate to the section of Box Tunnel beneath the Site, and is not intervisible with the Site. On this basis, the Site is not considered to form part of the 'setting' of the asset which contributes to its overall heritage significance.

8.12. In the case of the MOD Corsham Quarry Operations Centre Murals, these exist on the walls of underground structures that extend into the northern part of the Site, 'underneath' the Site. The significance of the murals is principally derived from their physical form. The elements of 'setting; of the murals which contribute to their significance, albeit to a lesser degree than their physical form, their historical functional association with the (other) below-ground working areas of the MAP factory for which they were designed and installed – rather than the barracks located above-ground. The murals can only be seen and appreciated from the subterranean spaces where they are found. The other MAP spaces and structures below the Site form part of the 'setting' of this asset, but the upstanding structures and ground conditions at the surface of the Site do not.

8.13. In the case of residential properties (houses, cottages, etc), which make up the majority of the Listed Buildings within the 1km study area, elements of setting making a lesser contribution to significance include the assets' private accesses, gardens/grounds, and components of wider landholdings featuring in designed views towards and/or from them.

8.14. For none of the properties within the study area has an historical association (for instance of shared land ownership or occupancy) or a visual association (designed views either towards the Site from the assets or from the Site towards the assets) been identified. The Site is not a location from where any of the properties can be experienced. The Site does not form part of the setting of any of the properties, and the Zone of Theorical

Visibility indicates that any potential visibility of the proposed development would be limited at most. Should views be possible, it would be understood as a distant change, removed from the assets and important elements of their 'setting' and in the context of existing built form. The resulting change would not alter the ability to understand or experience the assets.

8.15. In the case of structures such as milestones, walls and gate piers, or tunnel accesses, which are also represented among the Listed Buildings within the study area, elements of setting making a lesser contribution to significance includes the assets' intentional physical positioning including in relation to nearby infrastructure with which they share an historical functional association. Should the proposed development be visible from such assets, it would in no way alter the ability to understand or experience their physical form, nor the significance that is derived from it.

8.16. In summary, the Proposed Development is not considered to result in a change to the 'setting' of Listed Buildings within the 1km study that would impact upon their overall heritage significance. No Listed Buildings beyond the 1km study area have been identified as having the potential to be sensitive to the proposals.

8.17. Potential impacts on the heritage significance of Listed Buildings within the wider environs of the Site as a result of a change in 'setting' are understood not to have been raised as a concern in the consideration of the previously approved redevelopment of the Site.

Scheduled Monuments

8.18. The significance of Scheduled Monuments is predominantly derived from the archaeological and historical interest of their above- and below-ground archaeological and structural remains.

8.19. All of the Scheduled Monuments within the study area are underground structures/spaces that were converted for use for/by the Central Government War Headquarters in the Cold War. The closest of these to the Site is the MOD Corsham Telephone Exchange *c.*10m north of the Site. It is not known whether this structure – or any of the others – are contiguous with other non-designated CGW HQ structures/spaces beneath the Site.

8.20. The elements of setting which contribute to the significance of each of the Scheduled Monuments, albeit to a lesser degree than their physical form, comprise their historical functional association with the (other) below-ground working areas of the CGW HQ – rather than the earlier MAP barracks buildings located above ground. The Scheduled Monuments can only be experienced from below-ground. If there are other structures of the CGW HQ below the Site, these may form part of the 'setting' of the assets; but the upstanding structures and ground conditions at the surface of the Site do not.

8.21. In summary, the Proposed Development is not considered to result in a change to the 'setting' of Scheduled Monuments within the 1km study that would impact upon their overall heritage significance. No Scheduled Monuments beyond the 1km study area have been identified as having the potential to be sensitive to the proposals.

8.22. Potential impacts on the heritage significance of Scheduled Monuments within the wider environs of the Site as a result of a change in 'setting' are understood not to have been raised as a concern in the consideration of the previously approved redevelopment of the Site.

Conservation Areas

8.23. The significance of Conservation Areas is predominantly derived from the character and appearance of the area contained within the designation boundary, which may be derived from spatial layout/street pattern, open spaces, built form including boundary treatments, and trees.

8.24. In the case of rural settlements, elements of setting making a lesser contribution to that significance might include immediately-outlying, historically-associated agricultural land, across which there are views from within and/or views into the Conservation Area.

8.25. In the case of Neston – the only Conservation Area within the 1km study area - the Conservation Area encompasses the historic settlement core and outlying farmland to the north-west. It is separated from the Site by a considerable amount of modern development, which includes housing, data centre warehouses, and MOD buildings in the Westwells area and either side of Westwells Road.

8.26. The Zone of Theorical Visibility indicates that glimpsed views of the Proposed Development may be visible from within the Conservation Area; however, the resulting change would be understood as one distinctly removed from the settlement (over 800m away) and in the context of existing built form. The resulting change would not alter the ability to understand or experience the special interest of the Conservation Area, and thus no harm is identified to this asset.

8.27. No concerns were raised in regard to the Neston Conservation Area in the consideration of the previously approved redevelopment of the Site.

# 9. Conclusions

9.1. Full Planning Permission is sought for the redevelopment of the Site as follows: *"Erection of 167no. dwellings, creation of access, public open space, infrastructure and associated works."*

9.2. Planning Permission for the residential redevelopment of the Site has previously been approved by Wiltshire Council, with it highlighted that the layout proposed under the current application is materially similar to that previously approved, in particular where it relates to known heritage assets 'beneath' the Site.

9.3. The 'Listed Buildings point' for the Grade II* murals within the belowground 'MOD Corsham: Quarry Operations Centre (QOC)', as recorded on the National Heritage List for England, is positioned adjacent to the Site boundary. The murals are situated in various locations within the military tunnels, including in parts of the tunnels which extend 'underneath' the Site, and are considered to represent non-designated heritage assets.

9.4. Part of the Box Tunnel (MWI79614) and the Great Western Railway within its alignment (MWI78874) extends through the Site boundary, again 'underneath' the Site. Box Tunnel is considered to represent a non-designated heritage asset.

9.5. The proposed development of the Site has been carefully informed by an understanding of the above designated and non-designated heritage assets.

9.6. The area above the Box Tunnel, would comprise an area of open space and the red line also circumvents retained air ducts in associated with the Box Tunnel and wider unground tunnels. The area of open space provides an opportunity for the interpretation and understanding of the military history of the Site and the surrounding area.

9.7. The applicant has the rights only to the upper 7m below ground level, and this in turn influences the depth of the potential grounds associated with the proposed development. Excavation of foundations into suitable undisturbed geology; these 'cuts' are expected to be on average 2m in depth across the Site.

9.8. Based upon the proposed layout and the scope of works set out above, it is not considered that the required construction works would physically impact upon the Box Tunnel or the military tunnels beneath the Site.

9.9. Both surface and intrusive groundworks – for levelling, the excavation of new building foundations, and the installation of drainage, cabling, etc – could destabilise and/or fracture, though physical excavation/drilling and associated vibrations, these structures. This risk could be mitigated by the detailed construction methodology; and, when taking into account the previously approved application, it is not considered that the potential for such mitigatable physical impacts should represent an 'in-principle' constraint to development.

9.10. It is considered likely that 19th-century quarrying and tunnelling, and 20th-century construction and demolition activity spanning the 1940s to 1980s, has impacted upon the earlier archaeological resource of the Site.

9.11. Any further potential archaeological remains within the Site, be that associated with former 20th-century military activity or earlier activity, are not considered to hold sufficient value to warrant consideration as non-designated heritage assets.

9.12. There is no evidence via the planning history records that the surviving 1940s, or later, military buildings within the Site have previously been identified by the Local Authority as non-designated heritage assets, nor were they expressly identified as such within the pre-application response.

9.13. Furthermore, there is no evidence that concerns were raised regarding their loss in the consideration of previously approved applications for the residential redevelopment of the Site (see **Section 2**). This considered to be a material consideration.

9.14. Nevertheless, should the Local Authority now come to a differing conclusion, based upon onsite assessment, it is considered that when taking into account the current condition and the standard building types utilised, that the overall heritage significance of the buildings would be low. This would be a material consideration under the Paragraph 216 balance (see further below).

9.15. No harm has been identified to heritage assets within the study area, as a result of a change in 'setting', and it is highlighted that no concerns were raised regarding potential impacts on designated heritage assets as a result of a change in setting in the consideration of the previously approved redevelopment of the Site.

9.16. In summary, the proposed residential development of the Site, which is notably similar to that previously approved, represents an informed response to the understanding of designated and non-designated heritage assets, specifically those which are situated 'beneath' the Site.

9.17. Thus, and on the basis of our current understanding of the position of the Local Authority with regards to built form within the Site, the proposed development is considered to be in accordance with Section 66(1) of the Planning (Listed Buildings and Conservation Areas Act 1990, Section 16 of the NPPF and Core Policy 58.

9.18. Should the Local Authority now take the view that the surviving military buildings within the Site should be classified as non-designated heritage assets, their loss would require consideration under Paragraph 216 of the NPPF:

9.19. High Court Judgements have confirmed that when considering potential impacts on non-designated heritage assets within the decision-making process, the balanced judgement required is different from the public benefits exercise associated with designated heritage

assets (as set out in Paragraphs 214 and 215 of the *NPPF*).[17]

9.20. Within a High Court Judgment of 2017, Jarman HHJ confirmed that the only requirement of the *NPPF* in respect of non-designated heritage assets is "*that the effect of an application on the significance should be taken into account*".[18]

9.21. This was further expressed in the Bohm decision, which stated that:

> ***[34] "Unsurprisingly, given that an NDHA [non-designated heritage asset] does not itself have statutory protection, the test in para 135*** [Paragraph 216 of the 2024 *NPPF*] ***is different from that in paras 132-4*** [Paragraphs 213-215 of the 2023 *NPPF*]***, which concern designated heritage assets. Paragraph 135*** [Paragraph 216 of the 2024 *NPPF*] ***calls for weighing "applications" that affect an NDHA, in other words the consideration under that paragraph must be of the application as a whole, not merely the demolition but also the construction of the new building. It then requires a balanced judgement to be made by the decision maker. The NPPF does not seek to prescribe how that balance should be undertaken, or what weight should be given to any particular matter."***[19]

9.22. As set out above, the overall low value of the building would be material consideration in understanding the Paragraph 216 balance, as would be the poor condition of the buildings and the level of asbestos which they contain; their unsuitability for conversion; and, most importantly, the previous acceptability of their loss in order to deliver a sustainable residential scheme at the Site.

[17] MHCLG, *NPPF*, paras. 214 and 215.
[18] Travis Perkins (Properties) Limited v Westminster City Council [2017] EWHC 2738 (Admin), Paragraph 44.
[19] Bohm [2017] EWHC 3217 (Admin).

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| Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor [2020] EWHC 2292 (Admin). |
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| 14 April 1946 | RAF/106G/UK/1415 |
| 4 November 1946 | RAF/CPE/UK/1821 |
| 11 May 1954 | RAF/58/1433 |
| 13 June 1967 | RAF/543/3859 |

# Appendix 1: Gazetteer

**Historic England**

Listed Buildings

| List Entry | Name | Grade |
|---|---|---|
| 1022055 | HUDSWELL HOUSE | II |
| 1022056 | JAGGARDS HOUSE | II* |
| 1022057 | ENTRANCE GATEPIERS TO JAGGARDS HOUSE | II |
| 1022058 | STABLE BLOCK AT JAGGARDS HOUSE | II |
| 1022059 | PRIVY IN WALLED GARDEN TO SOUTH OF JAGGARDS HOUSE | II |
| 1022060 | DOVECOTE AT JAGGARDS HOUSE | II |
| 1022079 | 24-28 | II |
| 1022099 | WALLS AND GATEPIERS TO POCKEREDGE FARMHOUSE | II |
| 1022124 | 17 AND 19 WESTWELLS | II |
| 1022125 | WESTWELLS FARMHOUSE | II |
| 1022732 | MILESTONE ABOUT 140 METRES NORTH OF JUNCTION WITH LANE TO BOX HILL | II |

| | | |
|---|---|---|
| 1022807 | RUDLOE COTTAGE | II |
| 1022809 | ENTRANCE GATES AND SCREEN TO RUDLOE MANOR | II |
| 1022810 | LOWER RUDLOE FARMHOUSE AND ATTACHED STABLE WING | II |
| 1022811 | RUDLOE PARK HOTEL | II |
| 1181579 | MILESTONE ON SOUTH SIDE ABOUT 300 METRES EAST OF CLIFT HOUSE | II |
| 1199306 | 42-52 | II |
| 1284018 | 6-10, HUDSWELL LANE | II |
| 1363593 | FOXFIRE LODGE | II |
| 1363955 | 62 AND 64 | II |
| 1363996 | THE GARDEN COTTAGE, AT JAGGARDS HOUSE | II |
| 1409132 | MOD CORSHAM: QUARRY OPERATIONS CENTRE (QOC) MURALS | II* |
| 1409161 | BOX TUNNEL EAST PORTAL (MLN19912) | II |

Scheduled Monuments

| List Entry | Name |
|---|---|
| 1409120 | MOD CORSHAM: KITCHEN, CANTEEN, LAUNDRY, DINING AND WASHROOM AREAS |
| 1409121 | MOD CORSHAM: LAMSON TERMINUS ROOM AND ASSOCIATED FAN ROOM |
| 1409123 | MOD CORSHAM: RADIO STUDIO |
| 1409125 | MOD CORSHAM: SLOPE SHAFT (EMERGENCY EXIT) A |
| 1409129 | MOD CORSHAM: GPO TELEPHONE EXCHANGE |
| 1409130 | MOD CORSHAM: PERSONNEL LIFT (PL) 2 |
| 1409131 | MOD CORSHAM: PRIME MINISTER'S ROOMS AND OPERATIONS ROOMS |
| 1409857 | MOD CORSHAM: TUNNEL QUARRY |
| 1409858 | MOD CORSHAM: QUARRY WORKING AREAS IN WEST LUNG, SPRING QUARRY |

**Wiltshire Historic Environment Record Data**

Events

| EvUID | Name |
|---|---|
| EWI10096 | Geophysical Survey for Boxfield to Box Pipeline |
| EWI10907 | Geophysical Survey of Land at Corsham |
| EWI1166 | Excavation at Monks Conduit House |
| EWI6711 | Evaluation for the Corsham Development Project |
| EWI7147 | Management Survey for MOD Corsham |
| EWI7150 | Watching Brief on the Corsham to Norington Cable Route |
| EWI7225 | Desk Based Assessment of The Quarry Tunnels |
| EWI7226 | Building Survey of the Telecommunications Equipment in the Tunnels, Corsham |
| EWI7896 | NAIS: Aerial Investigation and Mapping Across West Wiltshire |

Monuments

| MonUID | Name | Period |
|---|---|---|
| MWI1679 | Bronze Age Palstave, Box Tunnel | Bronze Age |
| MWI1704 | Pockeredge Farm | Medieval |
| MWI1706 | Westwells | Medieval |
| MWI1707 | Jaggards | Medieval |
| MWI1765 | Deserted Medieval Settlement, North of Hazelbury House | Medieval |
| MWI1783 | Rudloe House - Demolished | Medieval |
| MWI1786 | Mediveal Coin Hoard, North Part of 'Oldchurch' Field | Medieval |
| MWI1812 | Undated Enclosure, Northeast of Hazelbury Manor | Unknown |
| MWI1813 | Undated Enclosure, Northeast of Hazelbury House | Unknown |
| MWI2348 | Undated Enclosure, Lower Rudloe | Unknown |
| MWI2354 | Undated Enclosure, Lower Rudloe | Unknown |
| MWI31707 | Stone Quarry Tunnel, Corsham | Mid C19 to Late 20th Century |
| MWI32088 | MoD CORSHAM: Quarry Operations Centre (QOC ) Murals | Second World War to Mid 20th Century |

| | | |
|---|---|---|
| MWI32868 | Box Tunnel East Portal (MLN19912) | Mid C19 |
| MWI34134 | Dovecote at Jaggards House or Jaggards | Post Medieval to Late C17 |
| MWI34358 | 6-10 Hudswell Lane | C17 |
| MWI34359 | Jaggards House or Jaggards | Medieval to Post Medieval |
| MWI34360 | Stable Block at Jaggards House or Jaggards | Mid C18 |
| MWI34361 | The Garden Cottage at Jaggards House or Jaggards Cottage | Mid C18 to Late C18 |
| MWI34362 | Privy in Walled Garden to South of Jaggards House or Jaggards | C18 |
| MWI34385 | 24-28 Moor Green | Early C17 to Late C19 |
| MWI34430 | Pockeredge or Pockeridge Farmhouse | Early C17 to Late C19 |
| MWI34495 | 17 and 19 Westwells or Bramble Cottage (No.17) | Late C17 to Late C18 |
| MWI34496 | Westwells Farmhouse | Early C17 to Late C18 |
| MWI34498 | 62 and 64 Westwells or Cromwell Barn | Early C18 to Late C19 |
| MWI47333 | Westwells Barn or 40a Westwells | Post Medieval |
| MWI47729 | Barn at Jaggards House or Jaggards | Mid C18 to Late C19 |

| | | |
|---|---|---|
| MWI47765 | 14 Greenhill | Early C18 to Late C19 |
| MWI49818 | 41 Westwells | Early C18 to Late C19 |
| MWI53196 | Corsham Primary School, Broadwood Site or Box Highlands Primary School | C20 |
| MWI54851 | Ebenezer Baptist Chapel | Post Medieval |
| MWI57483 | Plot 1, Westwells Farmhouse | C20 |
| MWI58200 | 56 Westwells | Early C17 |
| MWI63045 | 11 Sheppards or 11 Shepherds | Modern |
| MWI64326 | Blacksmiths Workshop, Corsham | Post Medieval |
| MWI65860 | Lower Rudloe | C18 |
| MWI68517 | Rudloe House | C19 |
| MWI68518 | The Barn | C19 |
| MWI68519 | Gorse Farm, Box | Late C19 to Second World War |
| MWI68521 | Manor Farm (Bayliff Farm) | C19 |
| MWI68524 | Site of Outfarm, North of Manor Farm | C19 |

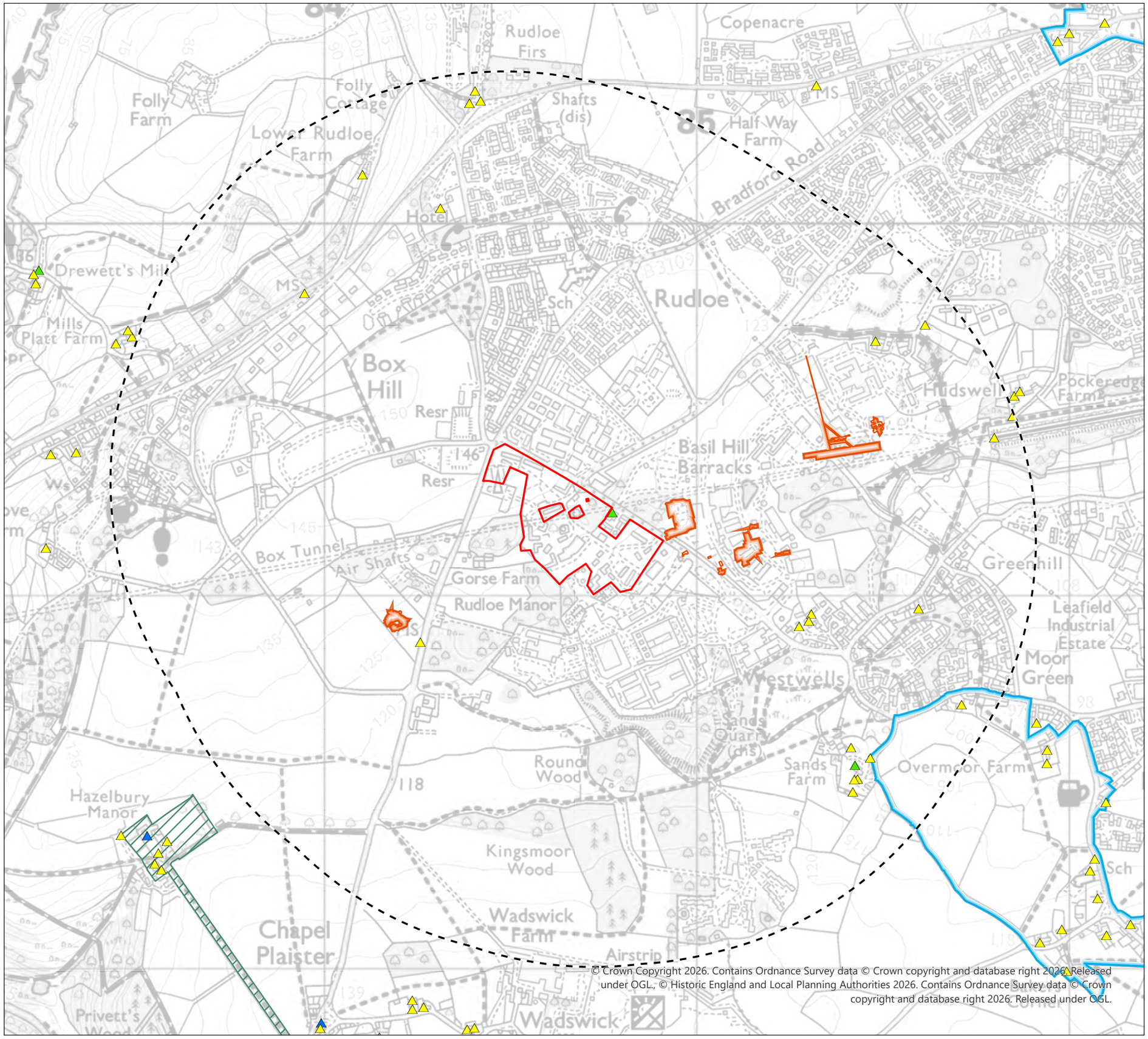
| | | |
|---|---|---|
| MWI68549 | Site of Outfarm adjacent to Jaggards Wood | C19 |
| MWI68550 | Jaggards House or Sands Farm | C17 |
| MWI68551 | Westwells | C17 |
| MWI73488 | 18th Century Air Shafts, Box Tunnel | Post Medieval |
| MWI73497 | WWII Barracks, Fiveways Trading Estate | Second World War |
| MWI73498 | 20th Century Spoil Heap, North of Round Wood | Early 20th Century to C21 |
| MWI73939 | WWII Military Camp, South of Upper Lane | Second World War |
| MWI73987 | 19th Century Quarry and WWII Hudswell Camp | Late C19 to Second World War |
| MWI74173 | WWII Military Camp, Corsham | Second World War |
| MWI74174 | WWII Military Camp, Rudloe | Second World War |
| MWI74175 | WWII Aircraft Obstructions, Gorse Farm | Second World War |
| MWI74176 | WWII Aircraft Obstructions, Rudloe | Second World War |
| MWI74177 | WWII Aircraft Obstructions, East of Rudloe | Second World War |
| MWI74178 | Post Medieval Ridge and Furrow on Basil Hill | Post Medieval |

| | | |
|---|---|---|
| MWI74948 | Plot 2, Westwells Farmhouse | C20 |
| MWI75361 | Wadswick Green Development | C21 |
| MWI76057 | 19th Century Quarry Slope Shafts, Box Tunnel | C19 |
| MWI77275 | Quarryman's Arms, Box Hill | Early C18 to C21 |
| MWI77276 | Clift Quarry, Box Hill | Mid C19 to Late 20th Century |
| MWI77299 | Tunnel Quarry | Mid C19 to C21 |
| MWI77300 | Spring Quarry | Mid C19 to Late 20th Century |
| MWI77668 | Type FW3/22 Pillbox, East of Box Tunnel Entrance | C20 |
| MWI77669 | Type FW3/22 Pillbox, East of Box Tunnel Entrance | C20 |
| MWI77670 | Type FW3/22 Pillbox, Corsham Military Camp | C20 |
| MWI78265 | Undated Ditches, North of Hazelbury Manor | Unknown |
| MWI78874 | Great Western Railway | Mid C19 |
| MWI79486 | Undated Enclosures, South of Bath Road | Unknown |
| MWI79614 | Box Tunnel, Box | Mid C19 |

| | | |
|---|---|---|
| MWI79666 | Lamson Terminus Room | Second World War to Late 20th Century |
| MWI79815 | Pockeridge House | Early C18 to Second World War |
| MWI79823 | Post Medieval Field System, North of Pockeridge Drive | Post Medieval |
| MWI79827 | Cold War Canteen Spring Quarry | Mid 20th Century to Late 20th Century |
| MWI79833 | Peronell Lift 2, Spring Quarry | Second World War to Late 20th Century |
| MWI79834 | Prime Minister's Rooms and Operations Rooms | Second World War to Late 20th Century |
| MWI79835 | MoD Corsham Radio Studio | Second World War to Late 20th Century |
| MWI80230 | 1-5 The Tynings, Love Lane, Box Hill | Mid C19 to Late C19 |

# Appendix 2: Figures

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**KEY**

- Site
- 1km Study Area

Conservation Areas

- Conservation Area

Listed Building points

Grade

- I
- II*
- II

- Scheduled Monuments
- Registered Parks and Gardens

| REV | DATE | DESCRIPTION |
|---|---|---|
| - | - | - |

## FIGURE 1: DESIGNATED HERITAGE ASSETS

**FORMER RAF RUDLOE NO.2, WESTWELLS ROAD, CORSHAM**

TAYLOR WIMPEY BRISTOL

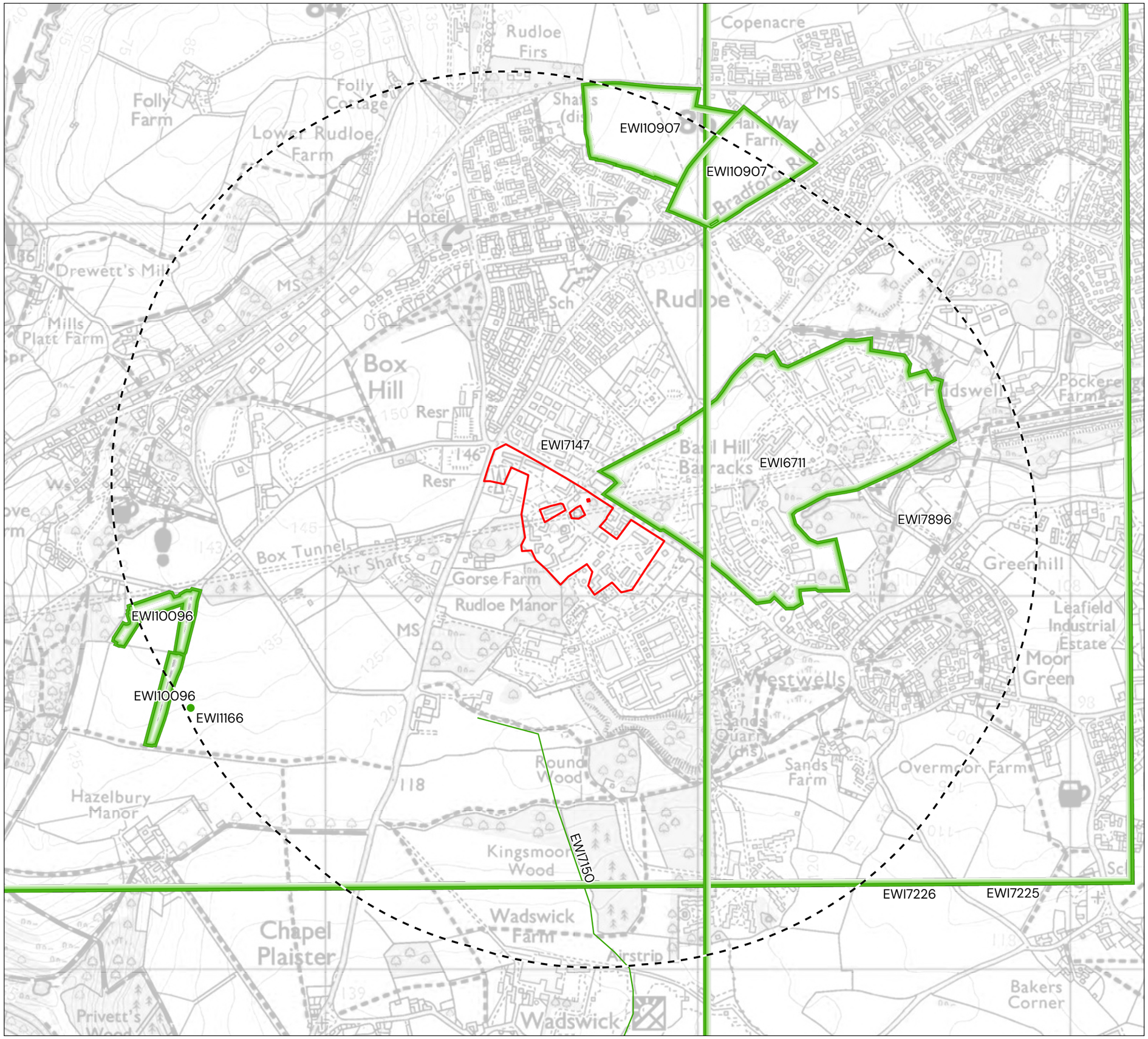
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**KEY**

- Site
- 1km Study Area
- Events
- Events
- Events

Contains Wiltshire Historic Environment Record data. Records are labelled by their EvUID.

Please note:
- The label for EWI7896 is associated with the large polygon that covers the eastern extent of the mapping.
- The labels for EWI7147, EWI7225, EWI7226 are associated with the large polygon that covers all of the mapping apart from the southern strip.

| REV | DATE | DESCRIPTION |
|---|---|---|
| - | - | - |

## FIGURE 2: HER EVENTS

**FORMER RAF RUDLOE NO.2, WESTWELLS ROAD, CORSHAM**

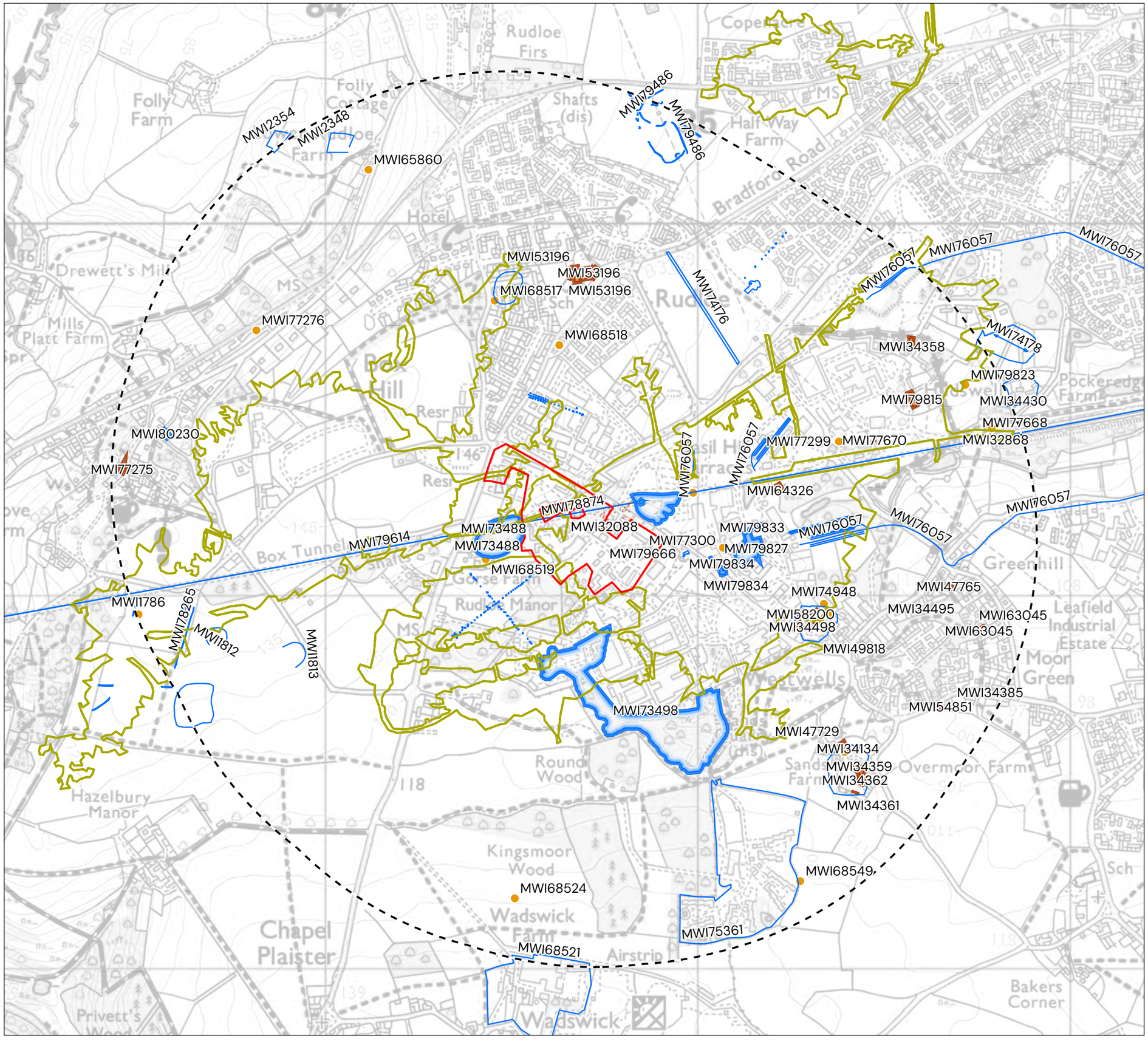
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**KEY**

- Site
- 1km Study Area
- MON Type (selected)
- MON Type (selected)
- MWI31707
- BLD Type (all)
- MON, BLD, FS Types (all)

Contains Wiltshire Historic Environment Record data. Records are labelled by their MonUID.

The monuments dataset has been manipulated for this figure to exclude all those polygons and lines relating to World War Two military camps, which are instead illustrated on Figure 4.

MWI73497 illustrates the mapped extent of "Stone Quarry Tunnel, Corsham".

| REV | DATE | DESCRIPTION |
|---|---|---|
| - | - | - |

## FIGURE 3: HER MONUMENTS

**FORMER RAF RUDLOE NO.2, WESTWELLS ROAD, CORSHAM**

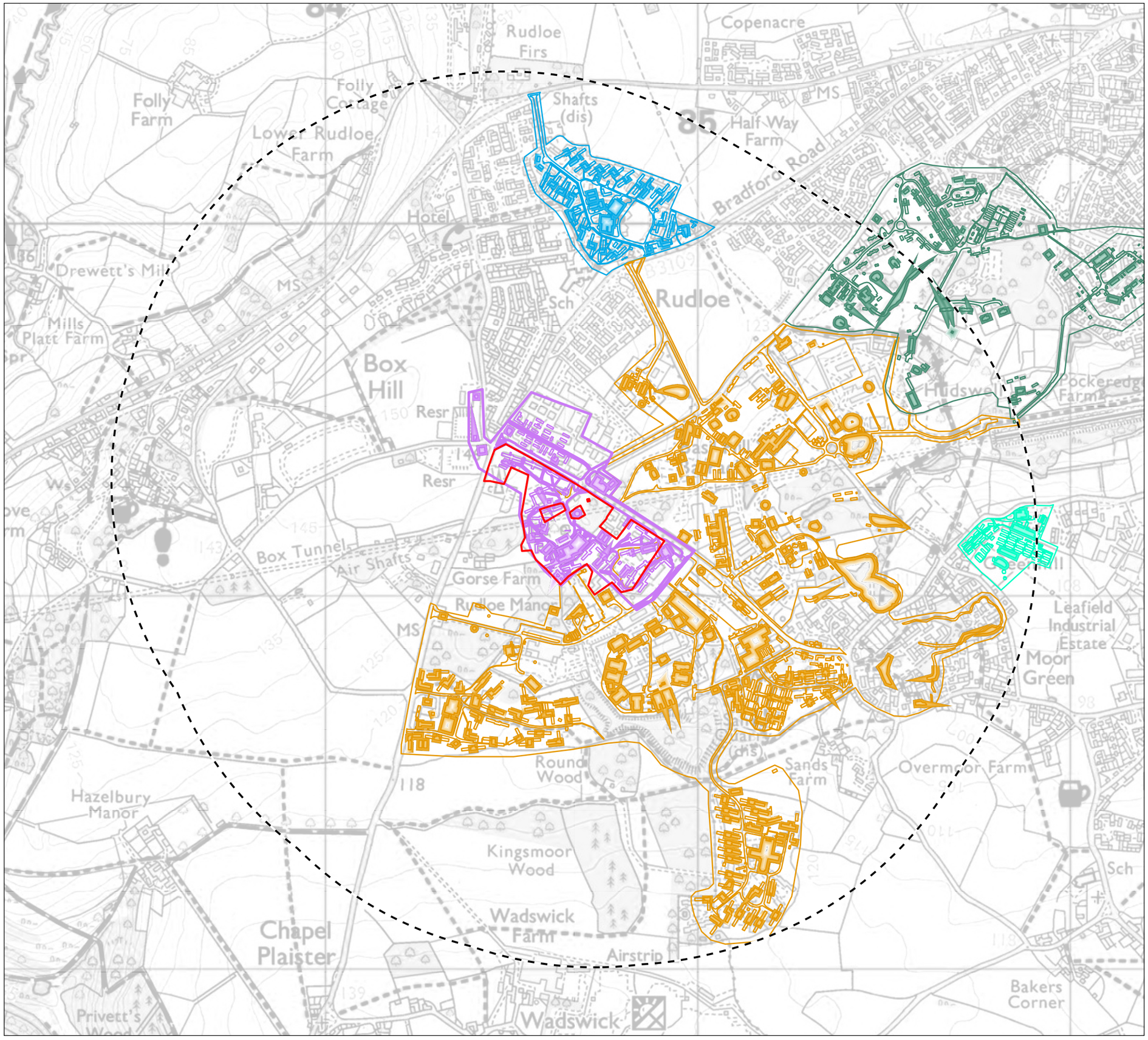
TAYLOR WIMPEY BRISTOL

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DRAWING NUMBER
P25_2742_HT_03

PEGASUS GROUP




**KEY**

- Site
- 1km Study Area
- MWI73497
- MWI73497
- MWI73939
- MWI73939
- MWI73987
- MWI73987
- MWI74173
- MWI74173
- MWI74174
- MWI74174

Contains Wiltshire Historic Environment Record data. Records are labelled by their MonUID.

The monuments dataset has been manipulated to show only World War Two military camps; the remaining data is shown on Figure 3.

MWI73497 = WWII Barracks, Fiveways Trading Estate
MWI73939 = WWII Military Camp, South of Upper Lane
MWI73987 = WWII Hudswell Camp (& C19 Quarry)
MWI74173 = WWII Military Camp, Corsham
MWI74174 = WWII Military Camp, Rudloe

| REV | DATE | DESCRIPTION |
|---|---|---|
| - | - | - |

## FIGURE 4: HER MONUMENTS

**FORMER RAF RUDLOE NO.2, WESTWELLS ROAD, CORSHAM**

TAYLOR WIMPEY BRISTOL

| DATE | SCALE | DRAWN | APPROVED |
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| 29/05/2026 | 1:10,000@A3 | HT/EP | HA |

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**KEY**

Site

Image courtesy of The Genealogist.

| REV | DATE | DESCRIPTION |
|---|---|---|
| - | - | - |

## FIGURE 5: 1838 TITHE MAP FOR BOX PARISH

**FORMER RAF RUDLOE NO.2, WESTWELLS ROAD, CORSHAM**

TAYLOR WIMPEY BRISTOL

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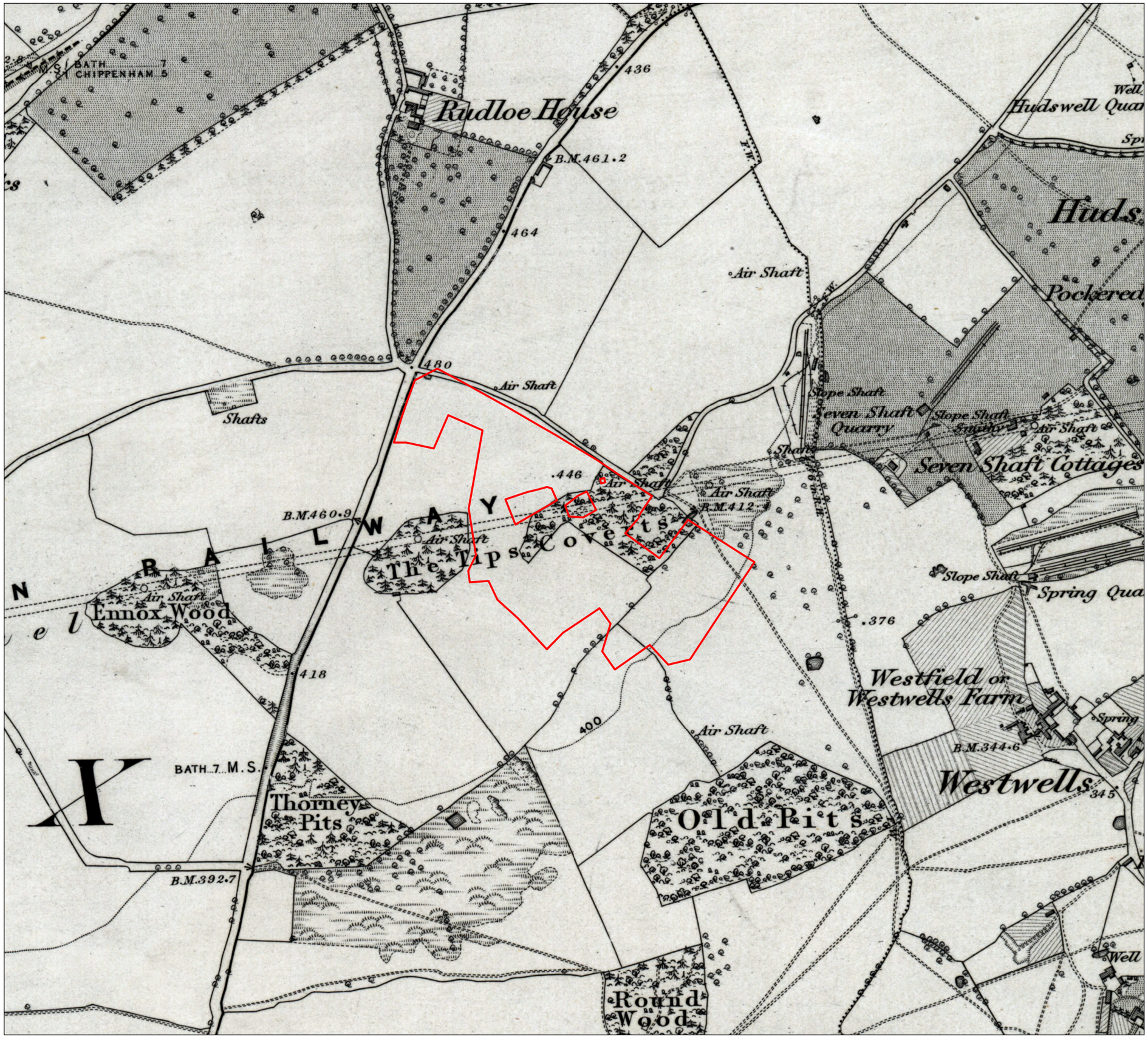
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the appropriate avoidance of all ecological constraints during archaeological works. The drawing must be read in conjunction with and checked against relevant structural or other specialist drawings. Use only written dimensions -- DO NOT SCALE DRAWINGS.

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## FIGURE 6: 1889 ORDNANCE SURVEY MAP

**FORMER RAF RUDLOE NO.2, WESTWELLS ROAD, CORSHAM**

TAYLOR WIMPEY BRISTOL

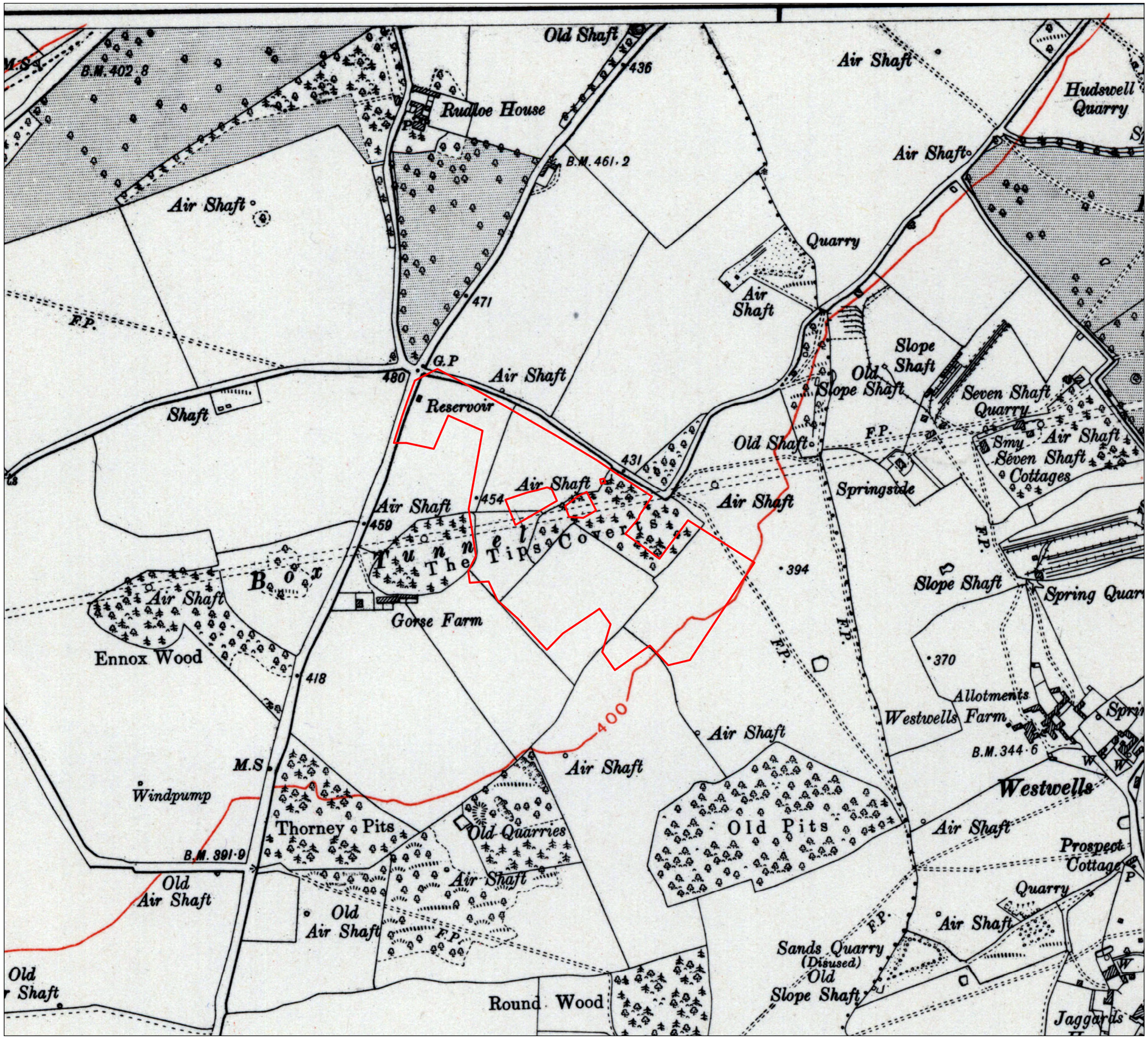
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## FIGURE 7: 1923 ORDNANCE SURVEY MAP

**FORMER RAF RUDLOE NO.2, WESTWELLS ROAD, CORSHAM**

TAYLOR WIMPEY BRISTOL

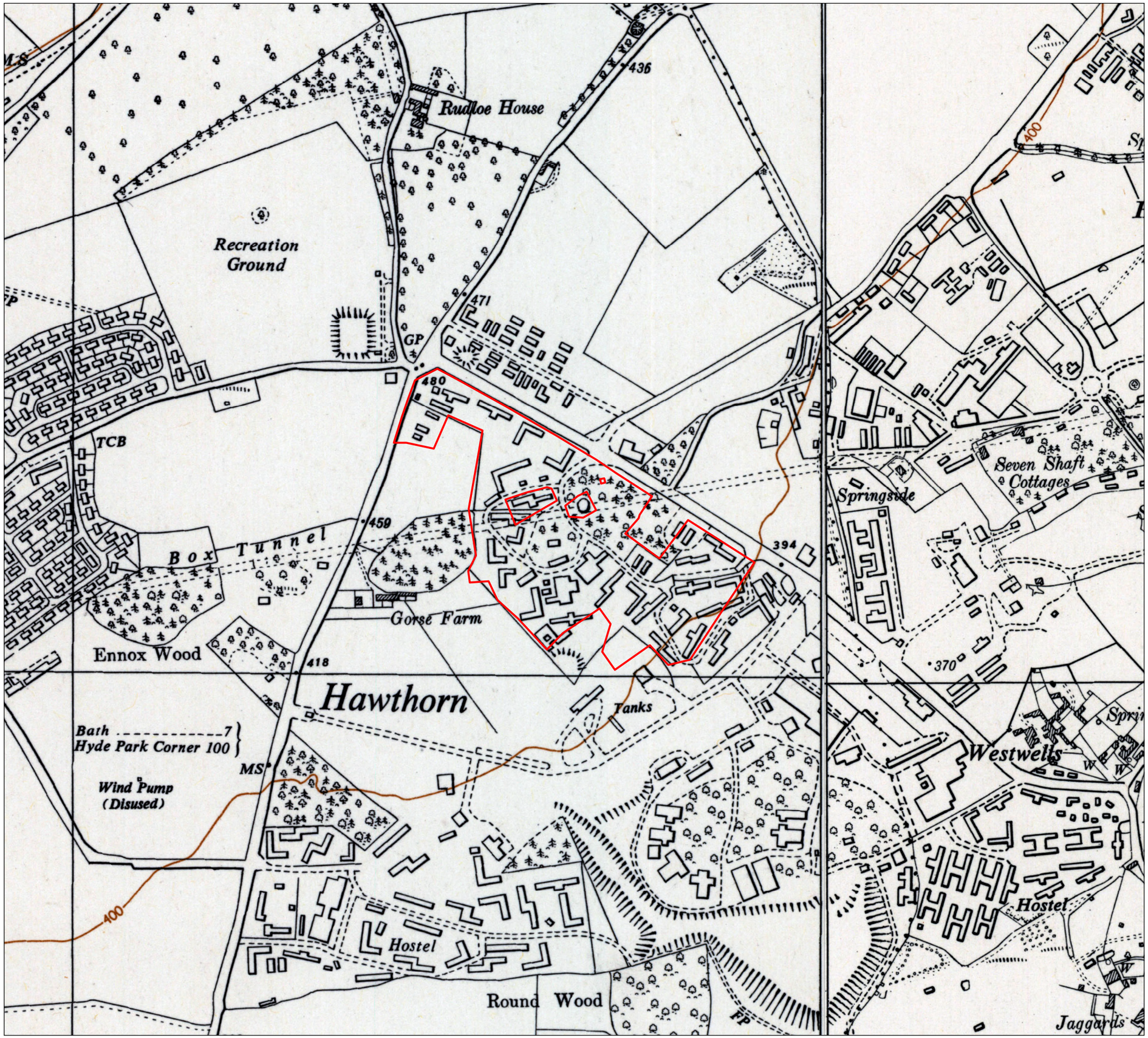
| DATE | SCALE | DRAWN | APPROVED |
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## FIGURE 8: 1960-61 ORDNANCE SURVEY MAP

**FORMER RAF RUDLOE NO.2, WESTWELLS ROAD, CORSHAM**

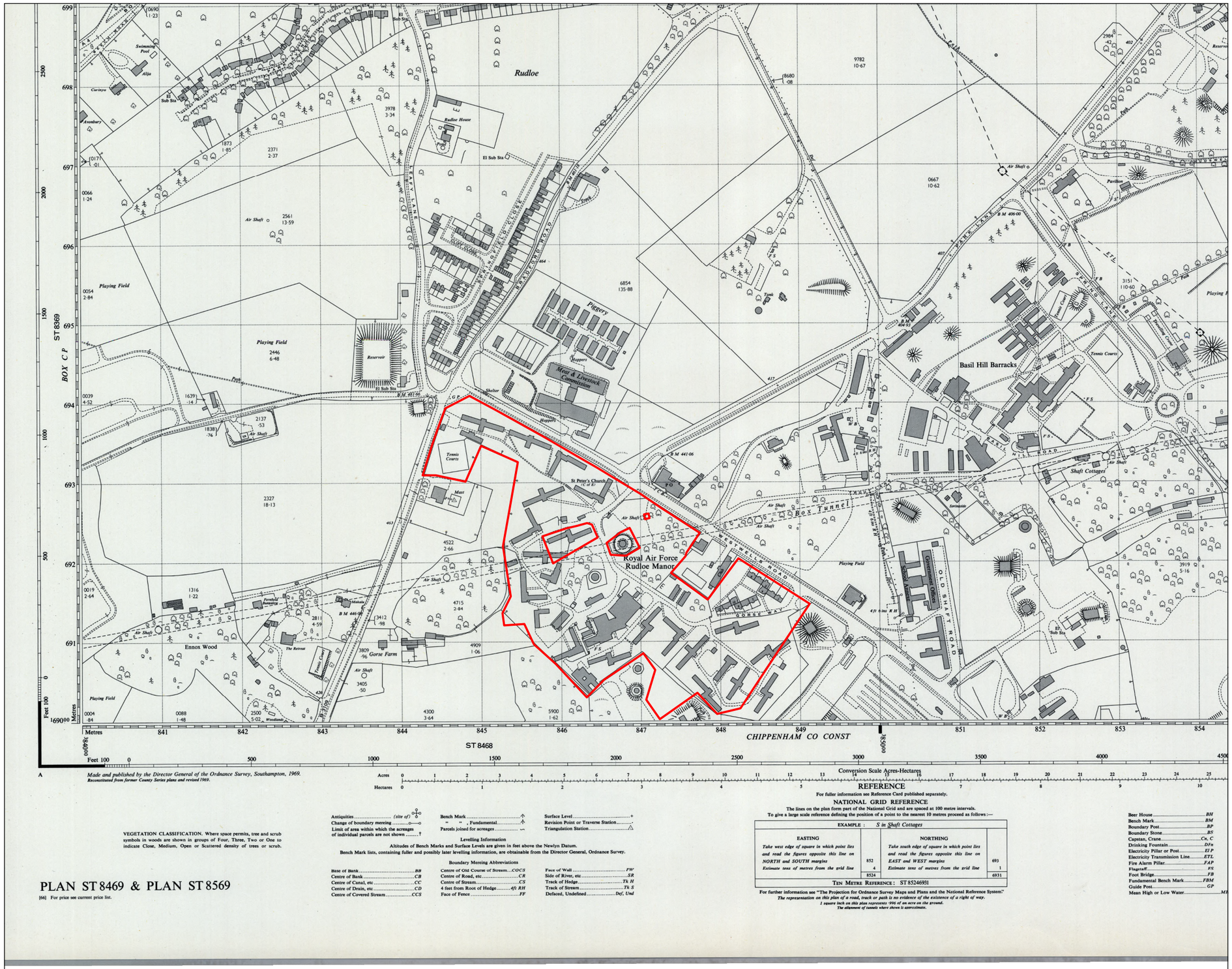
TAYLOR WIMPEY BRISTOL

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PEGASUS GROUP




**KEY**

Site

Image courtesy of National Library of Scotland.

| REV | DATE | DESCRIPTION |
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## FIGURE 9: 1969 ORDNANCE SURVEY MAP

**FORMER RAF RUDLOE NO.2, WESTWELLS ROAD, CORSHAM**

TAYLOR WIMPEY BRISTOL

| DATE | SCALE | DRAWN | APPROVED |
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**KEY**

- Site
- Former buildings recorded on 1960-61 OS

| REV | DATE | DESCRIPTION |
|---|---|---|
| - | - | - |

## FIGURE 10: DEMOLISHED BUILDINGS

**FORMER RAF RUDLOE NO.2, WESTWELLS ROAD, CORSHAM**

TAYLOR WIMPEY BRISTOL

| DATE | SCALE | DRAWN | APPROVED |
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# Appendix 3: Assessment Methodology

**Assessment of significance**

In the *NPPF*, heritage significance is defined as:

> ***"The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance."***[20]

Historic England's *GPA:2* gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.[21]

In order to do this, *GPA 2* also advocates considering the four types of heritage value an asset may hold, as identified in English Heritage's *Conservation Principles*.[22] These essentially cover the heritage 'interests' given in the glossaries of the *NPPF* and the *PPG* which are archaeological, architectural and artistic, and historic.[23]

The *PPG* provides further information on the interests it identifies:

- **Archaeological interest:** As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

- ***Architectural and artistic interest:*** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.

- ***Historic interest*:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.[24]

[20] MHCLG, *NPPF*, p.78.
[21] Historic England, *GPA:2*.
[22] Historic England, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008). These heritage values are identified as being 'aesthetic', 'communal', 'historical' and 'evidential', see idem pp. 28–32.
[23] MHCLG, *NPPF*, p. 78; MHCLG, *PPG, Annex 2*.
[24] MHCLG, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

Significance results from a combination of any, some, or all of the interests described above.

The most-recently issued Historic England guidance on assessing heritage significance, *HEAN:12*, advises using the terminology of the *NPPF* and *PPG*, and thus it is that terminology which is used in this Report. [25]

Listed Buildings and Conservation Areas are generally designated for their special architectural and historic interest. Scheduling is predominantly, although not exclusively, associated with archaeological interest.

**Setting and significance**

As defined in the *NPPF*:

> ***"Significance derives not only from a heritage asset's physical presence, but also from its setting."***[26]

Setting is defined as:

> ***"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, may affect the ability to appreciate that significance or may be neutral."***[27]

Therefore, setting can contribute to, affect an appreciation of significance, or be neutral with regards to heritage values.

**Assessing change through alteration to setting**

How setting might contribute to these values has been assessed within this Report with reference to *GPA:3*, particularly the checklist given on page 11. This advocates the clear articulation of "*what matters and why*".[28]

In *GPA:3*, a stepped approach is recommended, of which Step 1 is to identify which heritage assets and their settings are affected. Step 2 is to assess whether, how and to what degree settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. The guidance includes a (non-exhaustive) checklist of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, green space, functional relationships and degree of change over time. It also lists aspects associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquillity, sense of enclosure, accessibility, rarity and land use.

Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to explore ways to maximise enhancement and minimise harm. Step 5 is to make and document the decision and monitor outcomes.

A Court of Appeal judgement has confirmed that whilst issues of visibility are important when assessing setting, visibility does not necessarily confer a contribution to significance and factors other than visibility should also be considered, with Lindblom LJ stating at

[25] Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12* (Swindon, October 2019).
[26] MHCLG, *NPPF*, p. 78.
[27] MHCLG, *NPPF*, p. 78.
[28] Historic England, *GPA:3*, pp. 8, 11.

paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement):

> ***Paragraph 25 – "But – again in the particular context of visual effects – I said that if "a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one's experience of the listed building in its surrounding landscape or townscape" (paragraph 56)".***
>
> ***Paragraph 26 – "This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building's setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations, as in Williams (see also, for example, the first instance judgment in R. (on the application of Miller) v North Yorkshire County Council [2009] EWHC 2172 (Admin), at paragraph 89). But it is clear from the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a-013-20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical. These other considerations may include, for example, "the historic relationship between places". Historic England's advice in GPA3 was broadly to the same effect."*** [29]

**Levels of significance**

Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

In accordance with the levels of significance articulated in the *NPPF* and the *PPG*, three levels of significance are identified:

- **Designated heritage assets of the highest significance,** as identified in paragraph 213 of the *NPPF*, comprising Grade I and II* Listed buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 75 of the *NPPF*;[30]

- **Designated heritage assets of less than the highest significance,** as identified in paragraph 213 of the *NPPF*, comprising Grade II Listed buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas);[31] and

[29] Catesby Estates Ltd. V. Steer [2018] EWCA Civ 1697, paras. 25 and 26.
[30] MHCLG, *NPPF*, para. 213 and fn. 75.
[31] MHCLG, *NPPF,* para. 213.

- **Non-designated heritage assets.** Non-designated heritage assets are defined within the *PPG* as "buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets".[32]

Additionally, it is of course possible that sites, buildings or areas have no heritage significance.

**Assessment of harm**

Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against, such as whether a proposed development preserves or enhances the character or appearance of a Conservation Area, and articulating the scale of any harm in order to inform a balanced judgement/weighing exercise as required by the *NPPF*.

In accordance with key policy, the following levels of harm may potentially be identified for designated heritage assets:

- **Substantial harm or total loss.** It has been clarified in a High Court Judgement of 2013 that this would be harm that would "have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced";[33] and
- **Less than substantial harm.** Harm of a lesser level than that defined above.

With regards to these two categories, the *PPG* states:

> ***"Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated."***[34]

Hence, for example, harm that is less than substantial would be further described with reference to where it lies on that spectrum or scale of harm, for example low end, middle, and upper end of the less than substantial harm spectrum/scale.

With regards to non-designated heritage assets, there is no basis in policy for describing harm to them as substantial or less than substantial, rather the *NPPF* requires that the scale of any harm or loss is articulated whilst having regard to the significance of the asset. Harm to such assets is therefore articulated as a level of harm to their overall significance, using descriptors such as minor, moderate and major harm.

It is also possible that development proposals will cause no harm or preserve the significance of heritage assets. Here, a High Court Judgement of 2014 is relevant. This concluded that with regard to preserving the setting of a Listed building or preserving the character and appearance of a Conservation Area, "*preserving*" means doing "*no harm*".[35]

[32] MHCLG, *PPG*, paragraph 039, reference ID: 18a-039-20190723.
[33] Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin), para. 25.
[34] MHCLG, *PPG*, paragraph 018, reference ID: 18a-018-20190723.
[35] R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).

Preservation does not mean no change, it specifically means no harm. *GPA:2* states that "*Change to heritage assets is inevitable but it is only harmful when significance is damaged*".[36] Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

As part of this, setting may be a key consideration. When evaluating any harm to significance through changes to setting, this Report follows the methodology given in *GPA:3*, described above. Fundamental to this methodology is a consideration of "*what matters and why*".[37] Of particular relevance is the checklist given on page 13 of *GPA:3*.[38]

It should be noted that this key document also states:

> ***"Setting is not itself a heritage asset, nor a heritage designation…"***[39]

Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage interests that contribute to this significance, through changes to setting.

With regards to changes in setting, *GPA:3* states that:

> ***"Conserving or enhancing heritage assets by taking their settings into account need not prevent change".***[40]

Additionally, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor, would necessarily require Planning Permission to be refused. This point has been clarified in the Court of Appeal.[41]

**Benefits**

Proposed development may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage interests, and hence the significance, of the assets concerned.

As detailed further in ***Appendix 5*** the *NPPF* (at Paragraphs 214 and 215) requires harm to a designated heritage asset to be weighed against the public benefits of the development proposals.[42]

Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 214 to 216.[43]

The *PPG* provides further clarity on what is meant by the term 'public benefit', including how these may be derived from enhancement to the historic environment ('heritage benefits'), as follows:

> ***"Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8).***

[36] Historic England, *GPA:2*, p. 9.
[37] Historic England, *GPA:3*, p. 8.
[38] Historic England, *GPA:3*, p. 13.
[39] Historic England, *GPA:3*, p. 4.
[40] Historic England, *GPA 3.*, p. 8.
[41] Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061.
[42] MHCLG, *NPPF,* paras. 214 and 215.
[43] Including - Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor [2020] EWHC 2292 (Admin); MHCLG, *NPPF,* paras. 214 to 216.

***Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.***

***Examples of heritage benefits may include:***

- ***sustaining or enhancing the significance of a heritage asset and the contribution of its setting***
- ***reducing or removing risks to a heritage asset***
- ***securing the optimum viable use of a heritage asset in support of its long term conservation."***[44]

Any "heritage *benefits*" arising from the proposed development, in line with the narrative above, will be clearly articulated in order for them to be taken into account by the decision maker.

In addition to the statutory obligations set out within the *Planning (Listed Buildings and Conservations Area) Act 1990*, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.[45]

[44] MHCLG, *PPG*, paragraph 020, reference ID: 18a-020-20190723.

[45] UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

# Appendix 4: Legislative Framework

Legislation relating to the built historic environment is primarily set out within the Planning (Listed Buildings and Conservation Areas) Act 1990, which provides statutory protection for Listed Buildings and Conservation Areas.46 It does not provide statutory protection for non-designated or Locally Listed heritage assets.

Section 66(1) of the Act states that:

> ***"In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."47***

In the 2014 Court of Appeal judgement in relation to the Barnwell Manor case, Sullivan LJ held that:

> ***"Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise."48***

A judgement in the Court of Appeal ('Mordue') has clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134 of the 2012 version of the NPPF, the requirements of which are now given in paragraph 215 of the current, revised NPPF, see Appendix 5), this is in keeping with the requirements of the 1990 Act.49

[46] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.
[47] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990, Section 66(1).
[48] Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EWCA Civ 137. para. 24.
[49] Jones v Mordue [2015] EWCA Civ 1243.

# Appendix 5: National Policy Guidance

**The National Planning Policy Framework (December 2024)**

National policy and guidance is set out in the Government's *National Planning Policy Framework* (*NPPF*), the latest version of which was published in December 2024. The *NPPF* needs to be read as a whole and is intended to promote the concept of delivering sustainable development.

The *NPPF* sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The *NPPF* continues to recognise that the planning system is plan-led and that therefore Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application, including those which relate to the historic environment.

The overarching policy change applicable to the proposed development is the presumption in favour of sustainable development. This presumption in favour of sustainable development (the 'presumption') sets out the tone of the Government's overall stance and operates with and through the other policies of the *NPPF*. Its purpose is to send a strong signal to all those involved in the planning process about the need to plan positively for appropriate new development; so that both plan-making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than barriers. Conserving historic assets in a manner appropriate to their significance forms part of this drive towards sustainable development.

The purpose of the planning system is to contribute to the achievement of sustainable development and the *NPPF* sets out three 'objectives' to facilitate sustainable development: an economic objective, a social objective, and an environmental objective. The presumption is key to delivering these objectives, by creating a positive pro-development framework which is underpinned by the wider economic, environmental and social provisions of the *NPPF*. The presumption is set out in full at paragraph 11 of the *NPPF* and reads as follows:

> ***"Plans and decisions should apply a presumption in favour of sustainable development.***
>
> ***...***
>
> ***For decision-taking this means:***
>
> ***c) approving development proposals that accord with an up-to-date development plan without delay; or***
>
> ***d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:***
>
> > ***i. the application of policies in this Framework that protect areas or assets of particular importance[7] provides a strong reason for refusing the development proposed; or***
> >
> > ***ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in***

***this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination."***[50]

However, it is important to note that footnote 7 of the *NPPF* applies in relation to the final bullet of paragraph 11. This provides a context for paragraph 11 and reads as follows:

***"The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change."***[51] (our emphasis)

The *NPPF* continues to recognise that the planning system is plan-led and that therefore, Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application.

Heritage Assets are defined in the *NPPF* as:

***"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)."***[52]

The *NPPF* defines a Designated Heritage Asset as:

***"A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation."***[53]

As set out above, significance is also defined 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. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance."***[54]

[50] MHCLG, *NPPF*, para. 11
[51] MHCLG, *NPPF*, para. 11, fn. 7.
[52] MHCLG, *NPPF*, p. 73.
[53] MHCLG, *NPPF*, p. 72.
[54] MHCLG, *NPPF*, p. 78.

Section 16 of the *NPPF* relates to 'Conserving and enhancing the historic environment' and states at paragraph 208 that:

> ***"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."***[55]

Paragraph 210 goes on to state that:

> ***"In determining planning applications, local planning authorities should take account of:***
>
> ***a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;***
>
> ***b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and***
>
> ***c. the desirability of new development making a positive contribution to local character and distinctiveness."***[56]

With regard to the impact of proposals on the significance of a heritage asset, paragraphs 212 and 213 are relevant and read as follows:

> ***"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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."***[57]
>
> ***"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. Substantial harm to or loss of:***
>
> ***a. grade II listed buildings, or grade II registered parks or gardens, should be exceptional;***
>
> ***b. assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and***

[55] MHCLG, *NPPF*, para. 208.
[56] MHCLG, *NPPF*, para. 210.
[57] MHCLG, *NPPF*, para. 212.

***gardens, and World Heritage Sites, should be wholly exceptional."***[58]

Section b) of paragraph 213 which describes assets of the highest significance, also includes footnote 75 of the *NPPF*, which states that non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments should be considered subject to the policies for designated heritage assets.

In the context of the above, it should be noted that paragraph 214 reads as follows:

> ***"Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:***
>
> ***a. the nature of the heritage asset prevents all reasonable uses of the site; and***
>
> ***b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and***
>
> ***c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and***
>
> ***d. the harm or loss is outweighed by the benefit of bringing the site back into use."***[59]

Paragraph 215 goes on to state:

> ***"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."***[60]

With regards to non-designated heritage assets, paragraph 216 of *NPPF* states that:

> ***"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."***[61]

Overall, the *NPPF* confirms that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent it. Local Planning Authorities should approach development management decisions positively, looking for solutions rather than problems so that applications can be approved wherever it is practical to do so. Additionally, securing the optimum viable use of sites and achieving public benefits are also key material considerations for application proposals.

[58] MHCLG, *NPPF*, para. 213.
[59] MHCLG, *NPPF*, para. 214.
[60] MHCLG, *NPPF*, para. 215.
[61] MHCLG, *NPPF*, para. 216.

**National Planning Practice Guidance**

The then Department for Communities and Local Government (now the Ministry of Housing, Communities and Local Government (MHCLG)) launched the planning practice guidance web-based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled.

This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of planning practice guidance documents to be read alongside the *NPPF*.

The *PPG* has a discrete section on the subject of the Historic Environment, which confirms that the consideration of 'significance' in decision taking is important and states:

> ***"Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals."***[62]

In terms of assessment of substantial harm, the *PPG* confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the *NPPF*. It goes on to state:

> ***"In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.***
>
> ***While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm."***[63] (our emphasis)

**National Design Guide:**

> ***Section C2 relates to valuing heritage, local history and culture and states:***
>
> ***"When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how***

[62] MHCLG, *PPG*, paragraph 007, reference ID: 18a-007-20190723.

[63] MHCLG, *PPG*, paragraph 018, reference ID: 18a-018-20190723.

***these have influenced the built environment and wider landscape."***[64]

***"Sensitive re-use or adaptation adds to the richness and variety of a scheme and to its diversity of activities and users. It helps to integrate heritage into proposals in an environmentally sustainable way."***[65]

***It goes on to state that:***

***"Well-designed places and buildings are influenced positively by:***

- ***the history and heritage of the site, its surroundings and the wider area, including cultural influences;***
- ***the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;***
- ***the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details - see Identity.***

***Today's new developments extend the history of the context. The best of them will become valued as tomorrow's heritage, representing the architecture and placemaking of the early 21st century."***[66]

[64] MHCLG, *NDG*, para. 46.
[65] MHCLG, *NDG*, para. 47.
[66] MHCLG, *NDG*, paras. 48-49.

# Appendix 6: Relevant Development Plan Policies

**Wiltshire Core Strategy**

Core Policy 58: Ensuring the Conservation of the Historic Environment

***"Development should protect, conserve and where possible enhance the historic environment.***

***Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including:***

***nationally significant archaeological remains***

***World Heritage Sites within and adjacent to Wiltshire***

***buildings and structures of special architectural or historic interest***

***the special character or appearance of conservation areas***

***historic parks and gardens vi. important landscapes, including registered battlefields and townscapes.***

***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 potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping).***

***Heritage assets at risk will be monitored and development proposals that improve their condition will be encouraged. The advice of statutory and local consultees will be sought in consideration of such applications."***

# Appendix 7: List Entries

# MOD Corsham: Quarry Operations Centre (QOC) Murals

Listed on the National Heritage List for England. **Search over 400,000 listed places**

***(https://historicengland.org.uk/listing/the-list/)***

## Official list entry

Heritage Category: **Listed Building**

Grade: **II***

List Entry Number: **1409132**

Date first listed: **20-Mar-2013**

List Entry Name: **MOD Corsham: Quarry Operations Centre (QOC) Murals**

Location Description: Quarry Operations Centre, SQ1, Below Ground at MOD Corsham, Wiltshire

This List entry helps identify the building designated at this address for its special architectural or historic interest.

Unless the List entry states otherwise, it includes both the structure itself and any object or structure fixed to it (whether inside or outside) as well as any object or structure within the curtilage of the building.

For these purposes, to be included within the curtilage of the building, the object or structure must have formed part of the land since before 1st July 1948.

Understanding list entries

***(https://historicengland.org.uk/listing/the-list/understanding-list-entries/)***

Corrections and minor amendments

***(https://historicengland.org.uk/listing/the-list/minor-amendments/)***

## Location

The building or site itself may lie within the boundary of more than one authority.

District: Wiltshire (Unitary Authority)

Parish: Box

District: Wiltshire (Unitary Authority)

Parish: Corsham

National Grid Reference: ST8477669218

## Summary

A series of murals contained within the worked out chambers of a former Bath Stone quarry. The quarry was adapted to use as an underground aircraft factory in the early 1940s. This part of the factory was a canteen area. The murals were painted by Olga Lehmann (assisted by Gilbert Wood), and show a number of themed scenes, including a racecourse, a fairground, sporting scenes and cartoon-like depictions of primitive cultures. The majority of the murals are in a mess hall, although there are isolated examples in outer rooms and corridors.

## Reasons for Designation

The Quarry Operations Centre (QOC) Murals, in CGWHQ, below MOD Corsham are designated at Grade II* for the following principal reasons:

* Artistic: a prolific and accomplished artist of the 1930s and 1940s (latterly a film and television designer), Olga Lehmann's mural work was celebrated at the time, this specially-commissioned series in particular, where each mural has a very striking and highly distinctive design;

* Historic interest: the murals are an exemplary illustration of the fashion of the period for secular murals, the need to improve the welfare and morale of staff working underground for the war effort, and clearly show the style that Lehmann continued to popularise in the pages of the Radio Times and elsewhere;

* Rarity: the only known surviving murals by Lehmann (fragments also survive in other parts of QOC and the wider Corsham mines). Murals were a popular form of public art in hotels, offices, etc in the interwar years and very few remain from this era;

* Intactness: although many of the murals have faded or flaked over time, to varying degrees, the majority clearly retain their theme, strong palette and spirit. They survive remarkably well;

* Group value: the themes of English pastimes and rituals, including a wedding, cycling holidays and a day at the races have an intense interrelationship, granting a higher level of special interest of the individual murals.

## History

The Corsham Mines are a multi-layered historic site near Bath, beneath the southern end of the Cotswold Hills in Wiltshire. Quarrying of Bath Stone in the wider area took place from Roman times, and by the C18 Bath Stone had become a highly sought after building material. The opening of the Kennet and Avon canal in 1810, and the subsequent construction of the Great Western Railway in the 1840s, made the transportation of the stone to farther locations easier and cheaper, thereby increasing its popularity. Brunel's cutting of the Box Railway Tunnel, beside the village of Corsham, revealed a rich seam of high quality stone beneath the hills. Intense quarrying followed, leaving a network of quarries with worked-out chambers and air shafts, including Spring Quarry. By the time mining ceased in 1940, there were over 60 miles of tunnels across 3,000 acres, located at depths between 80 and 100 feet below ground.

The Bristol Aeroplane Company (BAC) at Filton, near Bristol was bombed in September 1940. In

response, Lord Beaverbrook, of the Ministry of Aircraft Production (MAP), issued an urgent plan to relocate all production below ground, which was endorsed by Churchill. The limitations of time, suitable sites, and wartime resources quickly saw the scheme scaled back to the relocation of Filton's engine plant. In December 1940 four quarries were requisitioned by the Ministry, including Spring Quarry, to the south of the Box Tunnel. It covers a vast 3,300,000 square foot area (or 76 acres). It was intended that BAC would convert Spring Quarry for engine production in 6 months, at an estimated cost of £100,000.

However, the scale of the Ministry's factory construction project was enormous, involving the removal of thousands of tons of rubble stone, the levelling of floors, and the strengthening of pillars and roofs using steel and concrete. Lifts, escalators, and an extensive ventilation system were installed. Furthermore, BAC became doubtful about the practicality of the project, and their involvement was scaled back. The factory was not ready for use by the end of 1942, when German bombing had largely ceased, and the need for the underground factory programme had all but vanished. The MAP factory was reclassified as a shadow factory, and proposed production was switched from the Hercules engine to the less vital Centaurus. In 1943, the scenic artist and portraitist Olga Lehmann (1912-2001) was invited by Sir Reginald Verdon, owner of BAC, to paint murals in the various canteens in the factory, in order to brighten the surroundings for the c10,000 workers that would be on shift underground.

By 1945, the factory was still incomplete to its original specifications, and its cost had risen to c£20 million. Engine production figures throughout the war were low, and the factory closed at the end of the war. MAP itself was abolished in 1946. Spring Quarry was bought by the government in 1954, when the north-east area was allocated for conversion to a secret CGWHQ for use in the event of nuclear conflict. As part of this conversion, some rooms in Quarry Operations Centre (QOC) were reconfigured, including the subdivision of some rooms with concrete block walls which cut through murals. Further alterations were made by the RAF when they used the area as a communications centre from 1979, following the reduction in size of CGWHQ and the subsequent removal of QOC and other western quarry areas from the newly-redefined citadel. The RAF vacated the area in the 1990s, and QOC has been unused since that time.

Spring Quarry was de-commissioned in the early 1990s. It was de-classified in 2004.

## Details

PRINCIPAL ELEMENTS: a collection of 32 wall murals of 1943 by Olga Lehmann, painted by brush and spray using oil paint and solvents. The majority are in a large group in one area, while others are spread through neighbouring areas, either in groups or as individual works.

DESCRIPTION: most areas in the Quarry Operations Centre (QOC) have no visible murals, although some may remain on walls that have been over-painted. The 32 known murals were designed in themed groups, and are located in the canteen or mess hall area in the west half of QOC (18 murals), and in the former RAF operations rooms and stores at the east end (11 murals). The remaining murals are located between the two locations (3 murals).

THE CANTEEN: this area retains the majority of murals: Jo Brown (Wall to west of M52), Umbrella (Pillar M51), Racehorses (Pillar M27), Photographers (Pillar M27), Red Racehorses (Pillar M27), Three Barmaids (Wall to west of Pillar M25), Winning Horse (Pillar to south of Pillar M16 – mural covers all sides of pillar), Mayor (Pillar M16), Spectators (Pillar M16), Red Spectators (Pillar M15), Horses (Pillar M3), Bar Scene (Wall to west of Pillar M7), Jockey Weigh-In (Pillar M16), Gypsy Caravans (Wall to west of Pillar M9), Dice Game (Pillar M9), Indian Rope Trick (Pillar M19), Shove Ha'Penny (Pillar M18), Find The Lady (Pillar M17).

THE RAF CONTROL ROOMS: Cricket (Room 51), Boxers (Room 37), Wrestlers (Room 37).

STORAGE AREA: Bride and Groom (Room 42), Houses (Room 42), Drunk with XXX Barrel (Room 42), Salvation Army (Room 42), Drunks (Room 43), Dominoes (Room 43), Cycling Drinks (Room 44), Snooker (Pillar M31).

CORRIDORS AND BARRACKS: Cannibals (Room 15), Eskimos (Pillar M31), Sunday Roast (Room 32).

A number of other murals in QOC are of lesser design interest, notably ethereal figures of horse heads and horse shoes, and wavy borders on walls and pillars. Furthermore, in some locations minor details of murals show through on heavily over-painted walls.

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# Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.




## Map

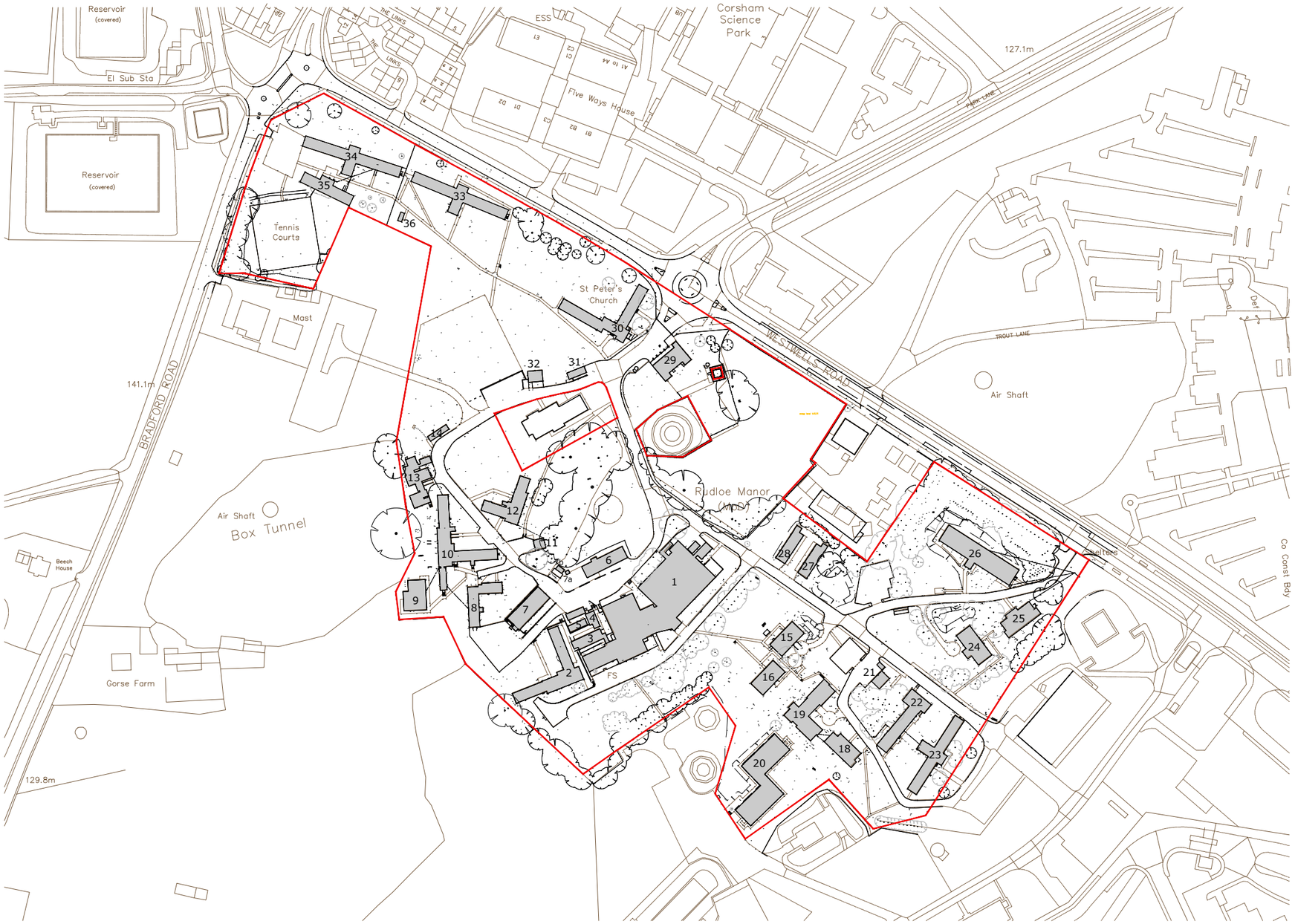
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**End of official list entry**

# Appendix 8: Numbered Building Plan

A3




| Building No | Storey Height | Area per Storey (sqm) | Total Building Area ( sqm) |
|---|---|---|---|
| 1 | 2 | 1972.92 | 3945.84 |
| 2 | 1 | 418.04 | 418.04 |
| 3 | 1 | 107.82 | 107.82 |
| 4 | 1 | 40.86 | 40.86 |
| 5 | 1 | 38.58 | 38.58 |
| 6 | 1 | 175.4 | 175.4 |
| 7 | 1 | 229.05 | 229.05 |
| 7a | 1 | 4 | 4 |
| 7b | 1 | 11.02 | 11.02 |
| 8 | 1 | 212.26 | 212.26 |
| 9 | 1 | 191.75 | 191.75 |
| 10 | 1 | 475.25 | 475.25 |
| 11 | 1 | 32.96 | 32.96 |
| 12 | 1 | 270 | 270 |
| 13 | 1 | 249.34 | 249.34 |
| 14 | 1 | 37.17 | 37.17 |
| 15 | 2 | 163.61 | 327.22 |
| 16 | 2 | 163.12 | 326.24 |
| 17 | 1 | | |
| 18 | 2 | 178.52 | 357.04 |
| 19 | 2 | 356 | 712 |
| 20 | 2 | 630.62 | 1261.24 |
| 21 | 1 | 48.48 | 48.48 |
| 22 | 1 | 293.92 | 293.92 |
| 23 | 1 | 346.87 | 346.87 |
| 24 | 2 | 200.08 | 400.16 |
| 25 | 2 | 208.36 | 416.72 |
| 26 | 2 | 477.15 | 954.3 |
| 27 | 1 | 118 | 118 |
| 28 | 1 | 121.4 | 121.4 |
| 29 | 1 | 192.99 | 192.99 |
| 30 | 1 | 398.39 | 398.39 |
| 31 | 1 | 38.36 | 38.36 |
| 32 | 1 | 48.58 | 48.58 |
| 33 | 1 | 389.26 | 389.26 |
| 34 | 1 | 389.26 | 389.26 |
| 35 | 1 | 197.63 | 197.63 |
| 36 | 1 | 11.05 | 11.05 |
| Totals | | | 13788.45 |

scale 1:2500

0 50m 100m 150m


**Romsey** T:01794 367703
**Portishead** T:01275 407000
**London** T:01794 367703

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| Rev | Description | Date | Au | Ch |
|---|---|---|---|---|
| P1 | Preliminary Issue | 26.01.26 | RP | MRW |
| P2 | Building numbers & Schedule of Areas added. | 21.04.26 | KK | KK |

Project **Rudloe 2, Corsham**

Drawing **Existing Site Layout**

| | | | | | |
|---|---|---|---|---|---|
| Client | Taylor Wimpey Bristol | | | | |
| Job no. | TAYL250329 | | | Date | 26.01.26 |
| Dwg no. | ESL.01 | | | Rev. | P2 |
| Author | KK | Checker | MRW | Scale | 1:2500 at A3 |
| Status | PRELIMINARY | | | Office | Portishead |
| Client ref. | | | | | |

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# Appendix 9: Gazetteer of On-Site Buildings

| Building No. | 1969 OS? | Description | Photo |
|---|---|---|---|
| 1 | YES | A series of linked brick-built buildings.<br><br>The two buildings at the north-east side have pitched sheet metal roofs. Joined to these are smaller, lower buildings with flat roofs.<br><br>The largest, tallest building is of two-storeys and has a flat roof and brick pillar buttresses along the north-western elevation.<br><br>The small building at the south-west side appears to have stepped access to ground floor or basement level.<br><br>The building to the rear of Building 3 has a pitched roof of corrugated cement sheeting.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1940s and was last used as offices, lecture hall, kitchen and canteen. |  <br>Two linked buildings at north-east end<br><br>  <br>North-east end of main core |

| | | | |
|---|---|---|---|
| 2 | YES | Single-storey L-shaped brick-built building, with whitewashed exterior and a pitched sheet metal roof.<br><br>The north-south range has a doorway at its north end and along the western elevation; and 10 windows of identical size and spacing along its eastern and western elevations. The south end was not visible.<br><br>The west-east range is in two parts, with the west end having 7 windows along its northern elevation. The southern elevation was not accessible.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1940s and was last used as offices and a gym. |  <br>North/south range, viewed from the north<br><br>  <br>West/east range, viewed from the north |
| 3 | YES | Not readily visible behind Building 5. | See Building 5 entry. |

| | | | |
|---|---|---|---|
| | | According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1950s and was last used as a boiler house and store. | |
| 4 | NO – A BUILDING IS SHOWN ON THE SAME FOOTPRINT BUT IS NOT THE SAME STRUCTURE | Pre-fabricated hut ('Portacabin'), identified as being of 1990s date by the Asbestos Inspection Report (Greenshield Environmental 2016).<br><br>Appears to have replaced an earlier building on the same footprint shown by the 1969 OS Map. | No photo taken. |
| 5 | NO | Pre-fabricated hut ('Portacabin'), identified as being of 1990s date by the Asbestos Inspection Report (Greenshield Environmental 2016). |  <br>Viewed from the north-west |

| | | | |
|---|---|---|---|
| 6 | YES | Single-storey brick-built building with a pitched sheet metal roof and metal doors on the southern elevation. Modern vehicle wash structure located adjacent to its west end.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1950s and was last used as a warehouse and store – this is a mix-up with Building 7. |  <br>East end of southern elevation<br><br>  <br>Vehicle wash structure adjacent to west end |

| | | | |
|---|---|---|---|
| 7 | YES | Large building built of brick and metal profile sheets, with a sloping flat roof. Doorway/entrance at east end; blind wall at west end. Crittal windows on the southern elevation; blind northern elevation.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1950s and was last used as a car wash and stores – this is a mix-up with Building 6. |  <br>East end and southern elevation |
| 7A | YES | Small square-shaped brick structure. On west side, external compound containing what appears to be electricity infrastructure. On east side, smaller brick-built open-fronted store.<br><br>Not included in the Asbestos Inspection Report (Greenshield Environmental 2016). |  <br>Viewed from the south |

| | | | |
|---|---|---|---|
| 8 | YES | Single-storey L-shaped building, built of brick and concrete blocks with narrow concrete buttress pillars and pitched sheet metal roofs.<br><br>Doorway at south end of north/south range. Brick walling and doorway visible at north end of north/south range. The western and eastern elevations of the west/east range were not visible.<br><br>Crittal windows with concrete lintels and cills on the northern and southern elevations of the west/east range. Blind wall at east end.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1950s and was last used for storage. |  <br>South end of north/south range and southern elevation of west/east range<br><br>  <br>Northern elevation of west/east range and north end of north/south range |

| | | | |
|---|---|---|---|
| 9 | NO | Not accessible during the site visit.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1990s and was last used as a test centre. | No photo taken. |
| 10 | YES – EXCEPT FOR RANGE EXTENDING SOUTH FROM SW CORNER | Single-storey L-shaped building with a short range extending south from the south-western corner.<br><br>Rendered exterior but presumed to be brick or concrete-built, with pitched sheet metal roofs.<br><br>Regular fenestration along the visible elevations. Doorway at north end of north/south range.<br><br>Overall very similar in appearance to Building 2.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1940s and was last used as offices. |  <br><br>Northern elevation of west/east range |

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| | | |  <br>Eastern elevation of north/south range |
| 11 | YES | Small, square-shaped, brick-built structure, which, according to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1950s and served as a store and gas meter room. |  <br>Viewed from the west |

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| 12 | YES | Single-storey L-shaped building. Rendered exterior but presumed to be brick or concrete-built.<br><br>Pitched sheet metal roof over the west/east range and the north end of the north/south range, and flat roof with possible water tank raised up on brick columns over the mid-section.<br><br>Regular fenestration along the southern elevation of the west/east range. Doorway on the western elevation and at the north end of the north/south range. Detached outbuilding, possibly a boiler house, in the corner of the L on the north side.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1940s and was last used as offices. |  <br>Viewed from the south<br><br>  <br>Viewed from the north |

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| 13 | ONE SMALL PART IS SHOWN ON THE 1969 OS | Only partially visible from the site road.<br><br>Single-storey building with a rendered exterior and a pitched metal sheet roof. Part of the building may be brick-built, while another part may be pre-fabricated.<br><br>Doorway at the east end of one unit extending towards the road. Windows on the southern elevation of that same unit.<br><br>Signage by the doorway at the east end reads 140 (presumably building number) / ELECTRIAL ISOLATION. Signage on the eastern elevation of the north/south range reads DIAL-A-UNIT (0905) 356018.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1940s and was last used as offices. |  <br>Viewed from the east |
| 14 | NO – A DIFFERENT, LARGER, BUILDING IS SHOWN TO THE REAR | Only partially visible from the site road.<br><br>Rectangular single-storey pre-fabricated building of metal construction and a flat roof. Doorway and small windows on the southern elevation.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1980s and was last used as offices. |  <br>Viewed from the south |

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| 15 | NO | Part of a group of modern two-storey accommodation blocks, built of brick with pitched tiled roofs, probably in the 1980s or 1990s.<br><br>Earlier buildings are recorded here by the 1969 Ordnance Survey Map, with the extant buildings visible on the earliest available Google Earth imagery dated 2002.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1970s and was last used as a dental practice. |  <br>Northern elevation<br><br>  <br>East end and southern elevation |

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| 16 | NO | Part of a group of modern two-storey accommodation blocks, built of brick with pitched tiled roofs, probably in the 1980s.<br><br>Earlier buildings are recorded here by the 1969 Ordnance Survey Map, with the extant buildings visible on the earliest available Google Earth imagery dated 2002. | |
| 17 | NO | According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1980s and was last used as a compressor room. | |
| 18 | NO | Part of a group of modern two-storey accommodation blocks, built of brick with pitched tiled roofs, probably in the 1980s.<br><br>Earlier buildings are recorded here by the 1969 Ordnance Survey Map, with the extant buildings visible on the earliest available Google Earth imagery dated 2002. |  <br>Looking south-west |

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| 19 | NO | Part of a group of modern two-storey accommodation blocks, built of brick with pitched tiled roofs, probably in the 1980s.<br><br>Earlier buildings are recorded here by the 1969 Ordnance Survey Map, with the extant buildings visible on the earliest available Google Earth imagery dated 2002. |  <br>Looking south-west |
| 20 | NO | Modern two-storey accommodation block, built sometime between 2002 and 2006 based on a review of Google Earth imagery of these dates. |  |

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| 21 | YES | Small, square, brick-built structure with a flat roof.<br><br>Doorway and blocked windows on north-western side. Blocked window and blocked hatch with arched lintel on south-western side.<br><br>Very similar to Building 31.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1940s and served as a plant room. |  <br>Viewed from the north-west<br><br>  <br>Viewed from the west |

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| 22 | YES | Single-storey brick-built structure with flat roof. Exterior has been whitewashed but is heavily peeling particularly on the south-eastern elevation.<br><br>Entrance on north-western elevation, with signage indicating its most recent use as a training centre. Windows on both the north-western and south-eastern elevations.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1940s and was last used as a training centre. |  <br>North-western elevation<br><br>  <br>South-west end and south-eastern elevation |

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| 23 | YES | Single-storey brick- and concrete-built structure with pitched corrugated cement sheeting. Exterior has been rendered but is missing in places.<br><br>Doorway at the south-western end, and windows along the north-western and south-eastern elevations of the south-west section of the building.<br><br>The cross-wing and north-east section of the building were not accessible.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1940s and was last used as offices. |  <br>North-western elevation of south-western section<br><br>  <br>South-west end and south-eastern elevation of the south-western section |

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| 24 | NO | Part of a group of modern two-storey accommodation blocks, built of brick with pitched tiled roofs, probably in the 1980s.<br><br>Earlier buildings are recorded here by the 1969 Ordnance Survey Map, with the extant buildings visible on the earliest available Google Earth imagery dated 2002. |  <br>North-west end |
| 25 | NO | Part of a group of modern two-storey accommodation blocks, built of brick with pitched tiled roofs, probably in the 1980s.<br><br>Earlier buildings are recorded here by the 1969 Ordnance Survey Map, with the extant buildings visible on the earliest available Google Earth imagery dated 2002. |  <br>North-western elevation |

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| 26 | NO | Part of a group of modern two-storey accommodation blocks, built of brick with pitched tiled roofs, probably in the 1980s.<br><br>Earlier buildings are recorded here by the 1969 Ordnance Survey Map, with the extant buildings visible on the earliest available Google Earth imagery dated 2002. |  <br>South-western elevation |
| 27 | YES | Single-storey brick-built building with pitched metal sheet roof.<br><br>Overhanging canopy, three doorways, and seven Crittal windows on the north-western elevation. Seven Crittal windows on the south-eastern elevation. One Crittal window also on the south-west end.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1940s and was last used as stores. |  <br>North-western elevation and south-west end |

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| 28 | YES | Single-storey brick-built building with pitched metal sheet roof.<br><br>Overhanging canopy, three doorways, and seven Crittal windows on the south-eastern elevation. Two Crittal windows also on the south-west end.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1940s and was last used as stores. |  <br>South-eastern elevation and south-west end |
| 29 | NO | Single-storey, square building located beside the Westwells Road entrance.<br><br>Built of reconstituted stone blocks with a tiled hip and pitch roof. Overhanging canopy on the north-western (road) side.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1990s and was last used as a gate house (entrance lodge). |  <br>Viewed from the south-west |

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| 30 | YES | Group of three interlinked buildings making up an L-shape. Part of the building was used in recent years as St Peter's Church.<br><br>Built of brick and concrete blocks, which have been whitewashed (now peeling heavily), with both flat and pitched sheet metal roofs.<br><br>A mix of Crittal windows and more modern windows along the south-western and north-eastern elevations of the western range.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1940s. |  <br>Viewed from the south-west<br><br>  <br>Viewed from the east |

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| 31 | YES | Small, rectangular, brick-built structure with a flat roof. Doorway on the southern side.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1950s and served as a store. |  <br>Southern side |
| 32 | YES | Small, square, brick-built structure with a flat roof and metal flue. Doorway and blocked windows on southern side.<br><br>Very similar to Building 21.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1940s and served as an incinerator room. |  <br>Southern side |

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| 33 | YES | This area was not safely accessible during the site visit and so the building was inspected from Westwells Road.<br><br>Single-storey building of cross-shape plan, with a pitched metal sheet roof. Regular fenestration along the northern elevation.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1940s and was last used as offices. |  <br>Northern elevation of the eastern section |
| 34 | YES | This area was not safely accessible during the site visit and so the building was inspected from Westwells Road.<br><br>It could only be determined that the building is single-storey with a pitched metal sheet roof. It is presumed to be of the same style as Building 33, with which it also shares the same cross-shaped plan.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1940s and was last used as offices. |  <br>Northern elevation (concealed by vegetation) |

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| 35 | YES | This area was not safely accessible during the site visit and so the building was inspected from Westwells Road.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1940s and was last used as a social hall. |  <br>Looking east |
| 36 | NO | This area was not safely accessible during the site visit and could not be discerned from Westwells Road.<br><br>According to the Asbestos Inspection Report (Greenshield Environmental 2016), it likely dates from the 1970s and served as a gas meter house. | No photo taken. |

**Planning (Listed Buildings and Conservation Areas) Act 1990**
**Town & Country Planning Act 1990 (as amended)**
**Planning and Compulsory Purchase Act 2004**

**Cirencester**
33 Sheep Street, Cirencester, GL7 1RQ
T 01285 641717
Cirencester@pegasusgroup.co.uk
Offices throughout the UK and Ireland.

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