

Former Co-operative Store, Mill Street Calne Wiltshire

Heritage Statement

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1. INTRODUCTION

- 1.1 Peter Davenport, Historic Building Consultant, was commissioned by Cedar Care Ltd, through BBA Architects, to produce a Heritage Statement in relation to proposals to redevelop the site of the former Co-operative Store at Mill Street Calne, Wiltshire as a care home and sheltered accommodation. The site is centred at NGR:399907171003 (Figure 1).
- 1.2 The report is concerned with the effect of the proposed development on the character of the Conservation Area and on the settings of the designated assets nearby. It is not anticipated that the proposals will have any physical impact on the designated or, indeed, undesignated heritage assets in the vicinity. A separate report has been prepared assessing the likelihood of buried archaeological remains on the proposal site and their significance (Avon Archaeology 2026). That likelihood was assessed as low to moderate and the preservation of any remains was similarly rated, although there might be better preservation of any remains in the car park areas. The impact of development on any buried remains was not directly considered.
- 1.3 The site is currently occupied by the empty store formerly occupied by the Co-operative Society, a low, two-storey block dating to the 1970s and occupying a large portion of the site south of the River Marden, which runs through the site (Fig. 1). The rest, and the portion north of the river is open and used as a car park. No listed buildings or scheduled Monuments occur on the site (Fig. 2).

2. EXECUTIVE SUMMARY

- 2.1 An application is being submitted to demolish the former Co-operative store and build a care home and sheltered accommodation. The site is divided in two by the River Marden; the southern side is occupied by the store and car parking/loading areas and the north by a car park. The two sections are linked by two footbridges.
- 2.2 The site is bounded on the south by Mill Street (which has been somewhat realigned after the demolition of the Harris Bacon Factory and the redevelopment of the site after 1983/4, cf Figs 1 and 3), on the north by The Pippin, now largely occupied by a supermarket and car park, on the west by the Victorian Free Church and school and on the east by the River Marden which turns south here and has been modified to feed the former mill and passes under Mill Street.

- 2.3 The site is north of the best preserved area of the historic town, where the majority of Listed Buildings are situated and whose settings are the most likely to be affected (Fig. 2).
- 2.4 The present building is empty and derelict and of little architectural merit, being a typical example of 1970s retail design (Fig. 4). South of the river the proposed care home occupies much the same area, differing in detail, but with the car park north of the main building and south of the river laid down to grass. The car park north of the river is to be developed as eight assisted living units in two sets of five and three, and with staff and visitor parking and grassed areas. The footbridges across the river are to be retained and one made available to the public with a new footpath through to Mill Street (Fig. 5).
- 2.5 The new buildings will be broadly the same height as the present one in places, with a more variegated profile, which will affect views across the site to and from various listed buildings (Fig. 6). While this is a change to the settings of these buildings it is considered slight to negligible.

3. THE SITE

- 3.1 West and north-west of the site the setting of the site itself has been totally transformed since the 1984 closure and subsequent demolition and redevelopment of the Harris Bacon Factory (cf Figs 1 and 3). The Strand has been widened and its junction with the New Road (A4) opened out. The road and junction are lined with new buildings; these are, with the exception of the library and council offices (Fig. 17), of a scale matching that of the surviving buildings along New Road and Church Street/Mill Street (Fig. 7). A new public realm has been created along the Marden west of the Free Church and School, the river being de-culverted and landscaped (Figs 8 and 17). This has transformed the setting of the Free Church and school and opened up views of the co-op store and buildings around that were not previously available (Fig. 16).
- 3.2 North of the site was only lightly developed until the Sainsbury's store and other modern development and traffic arrangement came into existence. Prior to that the area was largely open. The houses along the eastern arm of the Pippin were built in stages from the late 19th century onwards, although the southernmost pair (Listed) date from the 17th to 18th century (Figs 2 and 9).

- 3.3 Before the 19th and 20th century developments, the High Street/New Road was densely built up, the roads converging on the market place (Strand/Market Street/ Castle Street) and with a secondary concentration along Church Street and Kingsbury/The Green. This is where the majority of Listed Buildings are to be found (Fig. 2). The 20th century realignment of the A4 removing the right angle turn at the Square has removed a long row of traditional houses along the south side of the old line of Curzon Street, leaving a stub at the east end. South of Quarr Barton and west of the listed buildings along Castle Street the area remained open ground until the later 20th century.
- 3.4 South of the site is where the great majority of listed buildings survive, with very little modern infill. Thus Church, Mill and Kingsbury Streets and the Green are the areas of designated assets whose settings are the most likely to be affected by the new development (Figs 2, 11-14). To this must be added the listed cottages at the south end of The Pippin (Fig. 9)

Significances.

- 3.5 With the exception of the Parish Church, the Listed Buildings in this area are all Listed Grade II (the Alms Houses in Kingsbury are Grade II*) so are of national importance and of medium to high heritage significance. Reasons for Listing are not given but it is assumed that they are included for their architectural/aesthetic and individual evidential value. In addition they have considerable group value giving this quarter of town, both in plan and elevation, its special character. Together they have a high evidential significance for the historical plan and development of the town from the 17th to the 19th century. The Parish Church is Listed Grade I and is of very high architectural and historical significance. The latter is prominently sited and its tower is a major landmark in the town, visible from almost everywhere in the town centre.
- 3.6 The nearest Listed Building is the Free Church which is almost abutted by the store and whose setting is most affected by the present building and will be by the proposed one (Figs 4 and 12).

4. THE PRESENT BUILDING

- 4.1 Only the exterior could be seen. The exterior is of two floors, the lower essentially an arcaded screen in concrete clad with stone-faced blocks in rangework; the upper a slate-hung, false mansard with a flat roof (Fig. 4).

- 4.2 The west elevation was inaccessible but the north and north-west elevations are stone-faced clad to the eaves and the arcades discontinued. There is a low tower, presumably a lift tower, on the north-west corner (Fig. 15). Some services are visible on the flat roof.
- 4.3 The building is, to say the least, undistinguished. It replaced a set of small houses and a school which, with one exception, post-dated the Tithe map of 1843 and appear on the 1880s First edition OS (also see Fig. 3). These clustered around the Free Church of 1867. The cinema of 1915 (replaced by the present store) replaced the pre-1843, and, indeed, pre-1828 building. The rest of the site remained largely open until the construction of the present store.
- 4.4 The building has some evidential value as an example of 1960s/70s planning and architecture, but this is low as the design is mediocre and the evidence is documented elsewhere (Figs 4 and 15).
- 4.5 Its impact on the setting of the adjacent Listed Buildings is entirely negative. The monolithic scale of the plan form and monotonous treatment are entirely at odds with the grain and character of the surrounding urban fabric (cf Figs 3, 4, 8, 11, 13-15).
- 4.6 The construction of the car park to the north caused the loss of the terrace of small houses, which appeared along the southern arm of the Pippin between 1843 and 1884. This was part of the redevelopment of the area after the closure and demolition of the Bacon Factory in 1983/4. That demolition and the consequent redevelopment massively altered the setting of the adjacent areas, largely it must be said, for the better, though perhaps not so positively as might have been wished (Figs 9, 16 and 17).

5. THE SETTING OF THE DESIGNATED ASSETS AROUND THE SITE

- 5.1 The site sits entirely within the Calne Conservation Area (CA), up against its northern edge. It is also in an area designated a Flood Risk Zone by Wiltshire County Council. The relevant part of the CA also encompasses all the Listed Buildings whose settings would be affected by the new development. The Conservation Statement prepared for the old North Wiltshire District Council is an assessment, area by area of the character(s) of the CA. It is somewhat out of date (the Bacon Factory had been demolished, but while planned, the library and council offices were not built at the time

of the assessment) but does define three relevant areas to characterise: The Strand and River Marden East (Area 4), Mill Street (Area 5) and Church Street and Kingsbury (Area 6). In addition is Area 7: The Green. Area 4 includes the development site and the east/west section of Church Street. Most of the eastern half was occupied by the Bacon Factory and is now all new development. Only the Free Church and school and the adjacent building to the west pre-date its removal. The other two areas have changed very little.

- 5.2 The setting of a heritage asset is what defines how the asset is experienced by the visitor. The setting is not only visual but may be. Thus, for example, heavy traffic nearby may affect the experience and therefore the setting, even if it is not visible from the asset. Equally, a tranquil, bucolic environment may be an essential part of the setting.
- 5.3 Nevertheless, unless there is some specific impact of noise, smell, litter or other social or industrial unpleasantness, it is the visual aspect of “setting” that is most often affected by changes to the environment of a designated asset.
- 5.4 The settings of the Listed Buildings around the site will be considered as a group and in appropriate cases, individually.

Area 4, The Strand etc

- 5.5 There are few heritage assets in this area. These are the Grade II Listed Free Church and its associated school, now hall, and the unlisted building to the west, plus the two listed cottages at the south-east corner of the Pippin. The unlisted building is an 18th or 19th century property which has been re-fronted and the ground floor street elevation destroyed by a set-back shop front. It was part of the row along the north side of Church Street destroyed by the Bacon Factory but it now stands exposed by the landscaping along the restored River Marden as it flows to the Strand. Its setting has therefore completely changed from a bounded terrace to a free-standing building sitting on the edge of the riverine landscaping. This has revealed the more interesting rear sections of the building. It is shielded from the development site by the Free Church. Like the Free Church it dominates the view from the rest of Church Street to the south (Fig. 12). Prior to the construction of the Co-op the Free Church was set back and not so dominant from the east, although it would have been very visible above the buildings formerly to its east. Of course both these buildings would have been totally overpowered by the Bacon Factory hard against them.

- 5.6 The Co-op store was built almost up to the side of the Free Church plot. The previous buildings to its east (pre-dating 1763, as they are marked on a map of that date) were also tight up to the boundary but projected well into the current line of Church Street/Mill Street, the junction of which has been somewhat straightened. The frontage of the store was set some way back giving the church more presence on the street. The visual setting of these two structures has, therefore, changed considerably over their lifetimes, from simple street frontages, later overpowered by the proximity of the tall factory and its chimneys, to free-standing, visually very prominent buildings visible from all around. The church in particular and its school/hall now form a satisfying, almost sculptural architectural ensemble seen from three sides, lapped by the river and softened by greenery (Fig. 8). This is all experienced by walking through the recent landscaping, hard and soft, from the Strand or from the northern car park and The Pippin.
- 5.7 Despite the store bullying its way up to the Free Church and hiding its east elevation, the church more than holds its own against the plain, indeed boring, south elevation of the former. Nevertheless, moving the west side of the new building away from the church, as is proposed, would much improve the ability to experience the building and, therefore, its setting. This small group also livens up the experience of walking from the Strand towards the church and its neighbour as a contrast to the anaemic but relatively harmless new frontages along both sides of the Strand, replacing the factory (Figs 7 and 17), and as a reminder of past architectural self-confidence.
- 5.8 The two listed properties on The Pippin are just included in the Character Area 4. They are now very visible from the car park north of the river. The demolition of the terrace along the south side of The Pippin to create the current car park has opened up views to it from the south and south-west not previously available. It was formerly on the corner of the continuous built-up strip along the eastern and southern arms of that road, although when built was in relative isolation. Thus do settings change, for better or worse.

Area 5, Mill Street

- 5.9 This is basically the surviving part of Mill Street after the construction of the store. The lower end, on which the store sits, only has on the south side the rears of the Listed Buildings at 26-30 Church Street. 26 occupies the fork of the two streets and folds around the junction. The Co-op store forms the back drop to this building viewed from the south. From here the street runs along the side of the churchyard to Proclamation Steps and has only the store and car park on its northern side. The churchyard is

raised and is bordered by topiaried yew trees which largely bar views in and out. Despite being so close, the store is generally only glimpsed and only fully visible from the edge of the churchyard past the trees. From here, however, the store is very visible, its only virtue being that it is low (Fig. 18). Despite this, the churchyard therefore feels quite enclosed. Being raised above the street the churchyard is also experienced as separate from it.

- 5.10 The entrance to the store car park and this end of the building frames the view east along this stretch of Mill Street and the backs of the unlisted cottages along the near side which are nonetheless of heritage value. It is not clear why these are not listed while those opposite are. They are similar and mapped in 1828.
- 5.11 Past Proclamation Steps the road turns towards the mill and is lined by stone-rubble-built cottages (Fig. 10). Once entered, this street offers no views of the store, being entirely self-contained, apart from some narrow glimpses between the end of the unlisted row and the mill itself (Fig. 11). The street feels oddly isolated from the area around it, forming its own setting. However, the unlisted buildings on the west side have unobstructed views of the store site from their rear windows and this, therefore, forms part of their setting from the occupants point of view. This is a negative compared to the situation before 1970.
- 5.12 The Mill is significant historically as likely to be on the site of the medieval and earlier mill. The store dominates the view from the mill itself but is only glimpsed from the street, as mentioned above. The rear of the mill is visible from the store car park but the view is largely of the modern rear extension. This would also be the case in the new proposal.
- 5.13 The Grade II Listed Old Rectory at the top of Mill Street is on a slight eminence in a large walled garden and has clear views across to the store and beyond. From outside the property, these views do not form part of the setting but from within they do. That is, they form part of the experience of the building for those in it or in its grounds. This is to some extent true of all the houses in the vicinity of the proposal site, but more so for houses such as the Old Rectory, which, at least in part, are sited to take advantage of the view.
- 5.14 From the footpath to the footbridge over the Abberd Brook where it enters the Doctor's Pond, and from the path itself, the current store is prominent in all views out, especially of the parish church, and clearly affects the experience of the Listed Building (Fig. 19).

There is some historic significance to this corner as it is associated with Joseph Priestley's scientific experiments in the later 18th century. Despite a certain amount of tree cover the store is present to some degree or another in the views from here and the north-east and north, across the town towards the church and nearby areas. It is not over-dominant but adds nothing positive to the experience of the setting of the surrounding assets.

Areas 6 and 7, Church Street/Kingsbury/The Green

- 5.15 In terms of the architecture, these are probably the most important of the Character Areas, including the only II* Listed building, the 1682 Almshouses.
- 5.16 Church Street was the main road through the town before the New Road was created as a Turnpike in the 18th century. It now lined with mostly two-storey cottages of 17th to 19th century date, punctuated with occasional, taller, late 18th to 19th century houses and a few 20th century infills. All the buildings that are properly in Church Street are along the west side of the street, forming a continuous terrace edging the pavement, the eastern side being occupied by the churchyard at the northern end and, at the southern end, the backs of the properties on the west side of The Green and the junction with Kingsbury, and raised up on retaining walls.
- 5.17 The street is largely experienced as a unified but variegated strip of buildings. There are hardly any views out and these are glimpses to the west and up to the church. The view north is dominated by the Free Church and the probable church house at no. 30, while the Co-op store just intrudes. Looking south from the north end, the church and churchyard change the scale dramatically (Fig. 13). Across the churchyard all indications of the Co-op are hidden by the solid yew hedges.
- 5.18 By way of contrast, the rear of the southern end properties opens on to the car park and houses on the site of the demolished Bacon Factory (Carnegie Mews and car park and St Mary's Courtyard, Fig. 1). While not the most attractive environment, this is a huge improvement on the setting provided by the Bacon Factory.
- 5.19 The Green is a fortuitous but high-quality architectural set-piece, an ensemble of outwardly 18th and 19th century buildings, but many of which are from the 16th and 17th centuries, re-fronted. It forms its own inward-looking setting, but, as this area is higher than the others, views out from the buildings and gardens on the north and north-eastern side will, like the Old Rectory, take in the Co-op store to some extent. Apart from this, the store/development site does not really form part a significant part of the

setting of the Listed Buildings. Broadly, the development site is invisible from the streets in Areas 6 and 7 and they are largely invisible from it.

- 5.20 It can be concluded that the Co-op store is a negative feature of the settings of the heritage assets around it, but, seen in the changing historical context of the last 150 years one that causes very much less than substantial harm to significances of those assets as expressed in their settings. Its impact on the Conservation Area is similar, given that this, first, covers the areas assessed above and second, that the other areas, north and west of the site have been very much altered following the demise of the Bacon Factory and it is hard to see that this building has any negative effect at all on these parts of the CA (except that its current dilapidated and abandoned condition is clearly neither preserving nor enhancing them and there is much scope for improving the landscaping of the River Marden passing through and past the site).

6. DEVELOPMENT PROPOSALS AND IMPACT

- 6.1 The current proposals are for a two-storey rectangular block containing a care home; and two blocks of terraced, sheltered or assisted, accommodation north of the River Marden.
- 6.2 The care home is set back from Mill Street similarly to the present building line and also steps back at the eastern end. Unlike the irregular polygon of the present building it is a compact rectangle in plan and slightly smaller in area. It is set further away from the Free Church leaving room for a proposed public footpath and gardens between the church and the new build.
- 6.3 This increased visibility will greatly improve the setting of the Free Church, slightly offset by the insertion of a three-storey tower on the west corner of the new building. The creation of access from the north of the river through to Mill Street is also a positive contribution to the CA and again improves the setting of the Free Church and the school/hall associated with it.
- 6.4 The removal of the section of the present store that projects out to the river provides the opportunity for gardens/landscaping of the river itself, and Doctor's Pond, an improvement to the CA.
- 6.5 The assisted housing north of the river will remove public parking from this area, but the loss of this amenity is offset by the partial restoration of housing along the southern side of The Pippin, where there was a terrace until the later 20th century.

Gardens/landscaping south of the houses is an improvement to the CA, especially the river side. These houses will impact on the setting of the Listed cottages at the south-east corner of The Pippin, removing the more distant view from the south-west, but this is considered a neutral impact on their significances.

- 6.6 The plan form of the proposed buildings obviously provides opportunities for positive change to the immediate environment and improving the setting of the adjacent Listed Building (Fig. 5).
- 6.7 The impact on the other Listed Buildings nearby will depend more on the design and materials of the elevations and roofs. I have been informed that local materials (limestone, slate, some brick and lead) will form the palette of these buildings but at the time of writing this is still being considered. This is very likely to mean that the impact on the surrounding structures would be positive or neutral as long as too much busyness is avoided.
- 6.8 The main building will be essentially two storeys (Fig. 6) but the wall top, a parapet, is somewhat lower than the present flat roof. The roof apex on this block seems to be at the same height as the present flat roof. However, the Mill Street frontage has the tower at the west end. This will compete with the tower of the Free Church, but as it is set further away and is lower than the church's roof ridge it is unlikely to affect the experience of the church significantly. It, of course, supplies a full stop to the proposed façade at the point where the new footpath emerges.
- 6.9 At the other end is a small decorative gable. Similar features occur on the western and northern elevations and seem to be intended to pick up the designs of the newish development on the south side of the Strand (Fig. 7). They, of course, also reflect the gables on the rear of the houses on Mill Street, overlooking the site. Ashlar would seem to be appropriate to this design.
- 6.10 This elevation of the block is considered a positive or at least neutral impact on the significance of the surrounding buildings as expressed in their setting.
- 6.11 A separate block is proposed to the east, connected by the flat-roofed, glass-ended entrance hall (Figs 5 and 6). This will be treated differently, three-storeyed, with the top floor a mansard behind a parapet and given a lead or lead-like covering. This roof form, of course, nods to the existing false mansard in slate. This will have dormers. Unlike the fenestration in the main block, which are small domestic style windows, the mansard block has a stronger fenestration with larger openings.

- 6.12 This block is taller and more assertive than the main block, but it is set further away from the Mill Street row as it runs at right angles to the street, so diverges from them. Rising higher than the present building it will be more visible from the Mill and the Churchyard on the Mill Street side, and in views from the rear of buildings on The Green. This is a change in the settings of these buildings, but not necessarily a negative one. For example, it will probably make a positive contribution to the roofscape of the area generally. In the overall context of the development, compared to the present building this would be an improvement or neutral to their significance as expressed in the setting.
- 6.13 I have not seen elevations of the housing blocks north of the river, but the scale in plan suggests that these will be no more obtrusive than the earlier terrace here and will certainly improve the character of the CA here and firm up the boundary of the CA and improve the view into it from the modern developments to the north. However, the new buildings will change the setting of the two Listed Buildings across the road. They are currently open to the south and south-west. They will no longer be visible from the south-west, but will still be able to be seen from the south, Doctor's Pond etc and along the south run of The Pippin. This will reinstate the broad situation before 1983/4, especially as these blocks will be restricted to two storeys.
- 6.14 On balance, the impact on the significance as expressed in the setting will, despite the change, be neutral.
- 6.15 The change of use from supermarket to care home will change the activities around the building. For example, there will be fewer traffic movements and the general ambience would be quieter. This should improve the experience of the Conservation Area and the settings of the Listed Buildings.

7. LEGISLATIVE AND PLANNING POLICY FRAMEWORK

- 7.1 The key legislation and policy guidance applying to, and referenced where appropriate throughout this study is outlined below (with full relevant detail contained within Appendix 1) and includes:
- National Heritage Act 1983 (Amended 2002)
 - Planning (Listed Buildings and Conservation Areas) Act 1990
 - Ancient Monuments and Areas Act 1979
 - National Planning Policy Framework 2026

- Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment (Historic England 2008)
- Good Practice Advice in Planning Note 2: Decision-Taking in the Historic Environment (Historic England 2014)
- Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Historic England 2017)

7.2 The NPPF sets out national planning policy in relation to the conservation and protection of the historic environment.

Local Planning Policy and Guidance

- Wiltshire Core Strategy, 2015-2026 Core policy 57: Ensuring high quality design and place shaping; especially
 - ii. the retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development*
 - iii. responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting*
 - iv. being sympathetic to and conserving historic buildings and historic landscapes*
- Core Policy 58: Ensuring the conservation of the historic environment, Development should protect, conserve and where possible enhance the historic environment; especially
 - iii. buildings and structures of special architectural or historic interest*
 - iv. the special character or appearance of conservation areas*
- Calne Conservation Area Statement (undated but c. 1999). Character Appraisal (North Wiltshire District Council)

8. METHODOLOGY

8.1 The Heritage Statement identifies, and provides an assessment of, the contribution that setting makes to the significance of heritage assets that might receive impacts from proposals to demolish the Co-operative Store and redevelop the site. This has been achieved by collating all readily available evidence from the sources described below at para. 8.2. The Heritage Statement has been prepared in accordance with Standard and Guidance for Historic Environment Desk-Based Assessment (ClfA 2014, updated in 2017 and 2020), Good Practice Advice in Planning Note 2: Decision-Taking in the Historic Environment (Historic England 2014) and Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Historic England 2017).

8.2 The main element of the methodology was a site visit undertaken by the author, who has expertise and experience in analysing the historic development and heritage significance of buildings and their settings. Photographs were taken to illustrate the analysis, and plans and further photographs provided by the client were used to illustrate the current proposals. Further study included:

- Consultation of a Desk Based Archaeological Assessment by Avon Archaeology
- An earlier Heritage Statement by Nash Partnerships
- Wiltshire Know Your Place Website (KYP)
- Calne Conservation Area Statement by North Wiltshire District Council
- The National Heritage List for England (NHLE)
- Historic maps and images
- Google Street view, to supplement the site visit

Describing the value and significance of heritage assets

8.3 The value of heritage assets or heritage significance is defined Historic England's 'Conservation Principles' (HE 2008), namely:

- **Evidential value**, which derives from the potential of a place to yield evidence about past human activity;

- **Historical value**, which derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative;
- **Aesthetic value**, which derives from the ways in which people draw sensory and intellectual stimulation from a place; and
- **Communal value**, which derives from the meanings of a place for the people who relate to it or for whom it figures in their collective experience and memory. These values are closely associated within historical and aesthetic values, but tend to have additional and specific aspects.

8.4 National Planning Policy Framework (NPPF 2026) defines a similar set of values, but with slightly different terminology: **architectural (aesthetic and evidential); archaeological (evidential); artistic (aesthetic);** and **historic (historical)**. These terms are used where appropriate throughout this document to define heritage values. Taken together, these values represent the significance of the heritage asset. Historic England have recently moved to this terminology for consistency, but this has always been a distinction without much difference.

8.5 The NPPF framework, latest version 2026, which describes impacts on heritage significance in terms of 'substantial harm', 'less than substantial harm' and 'heritage benefit'. Harm or benefit (or neither) can come about through changes in setting of assets where there is no physical impact and this is the situation investigated here.

9. CONCLUSIONS

9.1 The existing store is of negligible heritage value and is considered to have a negative impact on the Conservation Area and a negative to neutral impact on the nearby Listed Buildings, depending on their proximity and siting. Its demolition would cause no harm to the Conservation Area. Enhancement of the CA depends on the quality of the replacement, in position, design and materials. The position and design of the proposed buildings are considered to enhance the Conservation Area and improve the setting of the Listed Buildings. It is probable that the materials and finishes will also have a positive effect, but this has yet to be demonstrated.

9.2 It is considered that the proposed development will conform with national and local heritage policies.

10. REFERENCES

Avon Archaeology 2022 *The Former Co-Op Store Site and Car Park, Mill Street, Calne, Wiltshire; Archaeological Desk-Based Assessment*

Calne Conservation Area Statement c. 1999 *Character Appraisal*. West Wiltshire District Council

ClfA (Chartered Institute for Archaeologists) 2014 (updated 2017 and 2020) *Standard and Guidance for Historic Environment Desk-Based Assessment*. Reading.

English Heritage, 2008 *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment*

Historic England 2014 *Good Practice Advice in Planning Note 2: Decision-Taking in the Historic Environment*

Historic England 2017 *Good Practice Advice in Planning Note 3: The Setting of Heritage Assets*

National Planning Policy Framework (NPPF) 2026

Nash Partnership 2022 *Heritage Statement for Co-op Site on behalf of Hawkfield Homes*

Wiltshire County Council 2015 *Wiltshire Core Strategy 2015-2026*

APPENDIX 1: RELEVANT STATUTE, POLICY AND GUIDANCE

Scheduled Monuments

Scheduled Monuments are subject to the provisions of the *Ancient Monuments and Archaeological Areas Act 1979* which sets out the controls of works affecting Scheduled Monuments and other related matters.

Listed buildings

Listed buildings are buildings of *special architectural or historic interest* and are subject to the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'). Under Section 7 of the Act *no person shall execute or cause to be executed any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest, unless the works are authorised*. Such works are authorised under Listed Building Consent. Under Section 66 of the Act *In considering whether to grant planning permission 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 feature of special architectural or historic interest which it possesses*.

Note on the extent of a Listed building

Under Section 1(5) of the Act, a structure may be deemed part of a Listed building if it is:

- (a) fixed to the building, or
- (b) within the curtilage of the building, which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948

The inclusion of a structure deemed to be within the *curtilage* of a building thus means that it is subject to the same statutory controls as the principal Listed building. Inclusion within this duty is not, however, an automatic indicator of *heritage significance* both as defined within the NPPF (2019) and within Conservation Principles. In such cases, the establishment of the significance of the structure needs to be assessed both in its own right and in the contribution it makes to the significance and character of the principal Listed building. The practical effect of the inclusion in the listing of ancillary structures is limited by the requirement that Listed Building Consent is only needed for works to the *Listed building* (to include the building in the list and all the ancillary items) where they affect the special character of the *Listed building* as a whole.

Guidance is provided by Historic England on *Listed Buildings and Curtilage: A Historic England Advice Note* (Historic England 2016).

NATIONAL PLANNING POLICY

National Planning Policy Framework (NPPF) 2026

NPPF (2026), Annex 2, defines a heritage asset as comprising:

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 [non-designated] assets identified by the local planning authority (including local listing).

Designated heritage assets

Designated heritage assets include Scheduled Monuments, Listed buildings, Registered Parks and Gardens, Battlefields and Protected Wrecks. These are formally identified on the National Heritage List for England (NHLE), which is the only official and up-to-date register of protected buildings and sites.

Non-designated heritage assets

Non-designated heritage assets include monuments, buildings, parks and gardens, areas, sites, places or landscapes identified as having a degree of significance in the planning process. These are normally identified by the local planning authority through formally adopted lists of local heritage assets. Such 'local lists' include monuments identified by Historic Environment Records (HERs), as well as local buildings, cinemas, heritage assets at risk and parks and gardens not nationally protected by virtue of being on the NHLE register.

NPPF (2026) Paragraph 194 identifies that *In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.*

Defining Heritage Significance

NPPF (2026), Annex 2, provides a definition of *significance* for heritage policy. This states that heritage significance comprises *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*

Archaeological Interest is also defined in **NPPF (2026), Annex 2**: *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.* Regarding 'levels' of significance the NPPF (2021) provides a distinction between: *designated heritage assets of the highest significance; designated heritage assets not of the highest significance; and non-designated heritage assets.*

Historic England's Conservation Principles (2008) expresses 'heritage significance' as comprising a combination of one or more of: evidential value; historical value; aesthetic value; and communal value.

Effects upon heritage assets

Heritage harm to designated heritage assets

NPPF (2026) does not define what constitutes *substantial harm*. The High Court of Justice does provide a definition of this level of harm, as set out by Mr Justice Jay in *Bedford Borough Council v SoS for CLG and Nuon UK Ltd*. Paragraph 25 clarifies that, with regard to *substantial harm*: *Plainly in the context of physical harm, this would apply in the case of demolition or destruction, being a case of total loss. It would also apply to a case of serious damage to the structure of the building. In the context of non-physical or indirect harm, the yardstick was effectively the same. One was looking for an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced.*

NPPF (2026) Paragraph 199 notes that *When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*

NPPF (2026) Paragraph 201 notes that *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.*

NPPF (2026) Paragraph 202 clarifies that *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.*

Heritage harm to non-designated heritage assets

NPPF (2026) paragraph 203 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.*

NPPF (2026) paragraph 205 states that *Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.*

NPPF (2026) paragraph 207 states that *Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.*

Heritage benefit

Not all developments affecting heritage assets will lead to harm to those assets, and the NPPF clarifies that change in the setting of heritage assets may lead to heritage benefit.

NPPF (2026) Paragraph 206 notes that *Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.*

Historic England Good Practice Advice Note 3 (GPA3; see Guidance below) notes that ‘good design may reduce or remove the harm, or provide enhancement’ (**GPA3, paragraph 28**). **Historic England’s Conservation**

Principles (CP; 2008) states that *Change to a significant place is inevitable, if only as a result of the passage of time, but can be neutral or beneficial in its effects on heritage values. It is only harmful if (and to the extent that) significance is reduced (CP Paragraph 84).*

Specific heritage benefits may be presented through activities such as repair or restoration, as set out in *Conservation Principles*.

LOCAL PLANNING POLICY

The Wiltshire Core Strategy 2015-2026 contains two relevant policies,

- Core policy 57: Ensuring high quality design and place shaping; especially
 - ii. the retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development*
 - iii. responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting*
 - iv. being sympathetic to and conserving historic buildings and historic landscapes*
- Core Policy 58: Ensuring the conservation of the historic environment, Development should protect, conserve and where possible enhance the historic environment; especially
 - iii. buildings and structures of special architectural or historic interest*
 - iv. the special character or appearance of conservation areas*

GUIDANCE

Good Practice Advice

Historic England has issued three Good Practice Advice notes ('GPA1-3') which support the NPPF. The GPAs note that they do not constitute a statement of Government policy, nor do they seek to prescribe a single methodology: their purpose is to assist local authorities, planners, heritage consultants, and other stakeholders in the implementation of policy set out in the NPPF. This report has been produced in the context of this advice, particularly 'GPA2 – Managing Significance in Decision-Taking in the Historic Environment' and GPA 3 – The Setting of Heritage Assets.

GPA2 - Managing Significance in Decision-Taking in the Historic Environment

GPA2 sets out the requirement for assessing *heritage significance* as part of the application process. Paragraph 8 notes *understanding the nature of the significance is important to understanding the need for and best means of conservation*. This includes assessing the extent and level of significance. GPA2 notes that *a desk-based assessment will determine, as far as is reasonably possible from existing records, the nature, extent and*

significance of the historic environment within a specified area, and the impact of the proposed development on the significance of the historic environment, or will identify the need for further evaluation to do so.

GPA3 – The Setting of Heritage Assets

The *setting* of a heritage asset comprises *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 (NPPF (2019), Annex 2).* Thus it is important to note that *setting* is not a heritage asset: it may contribute to the value of a heritage asset.

GPA 3 sets out a logical, five-step process for identifying and assessing the contribution setting makes to the significance of heritage assets, and for assessing the potential effects development might have upon that significance. These steps are:

- **Step 1:** Identify which heritage assets and their settings are affected;
- **Step 2:** Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
- **Step 3:** Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
- **Step 4:** Explore ways to maximise enhancement and avoid or minimise harm;
- **Step 5:** Make and document the decision and monitor outcomes.

