

**Hawke Ridge Business Park Ltd and Bellway
Homes Ltd**

Land at Hawke Ridge Business Park

Environmental Statement: Volume 1, Main Text

Chapter 14: Archaeology and Cultural Heritage





14 ARCHAEOLOGY & CULTURAL HERITAGE

INTRODUCTION

14.1 This Archaeology & Cultural Heritage chapter has been produced by Bristol & Bath Heritage Consultancy Ltd to assess the likely significant effects of the Proposed Development upon heritage assets (including archaeological sites and monuments) and the historic environment of the Application Site and its environs. It summarises, and is supported by, detailed built heritage and archaeological analysis contained within the following Technical Appendices which are cross-referenced as appropriate throughout this Chapter:

- Appendix 14.1 Heritage and Archaeology Statement
- Appendix 14.2 Figures
- Appendix 14.3 Written Scheme of Investigation for Archaeological Mitigation

14.2 The Proposed Development seeks to provide a mixture of retail units including a convenience store and roadside drive through, a 64-bed care home and 249 No. residential dwellings with associated access, green and blue infrastructure works. Refer to Chapter 5 for a detailed description of the scheme.

ASSESSMENT METHODOLOGY AND SIGNIFICANCE CRITERIA

14.3 This Archaeology and Cultural Heritage chapter has been produced in line with guidance in the ClfA ('Chartered Institute for Archaeologists') 'Standard and Guidance for Historic Environment Desk-Based Assessment' (2014, updated 2017 and 2020, Ref. 14.5), Statements of Heritage Significance: Analysing Significance in Heritage Assets (Advice Note 12; Historic England 2019, Ref. 14.10), Good Practice Advice in Planning Note 2: Decision-Taking in the Historic Environment (HEGPA 2; Historic England 2015, Ref. 14.8) and Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (HEGPA 3; Historic England 2017, Ref. 14.9). A detailed baseline Heritage and Archaeology Statement has been produced to support the planning application (**Appendix 14.1**) with an accompanying volume of figures (**Appendix 14.2**). The research and analyses contained in the Heritage and Archaeology Statement at **Appendix 14.1** underpins the prediction of the significance of effects and the mitigation measures presented in this chapter. Compilation of the baseline information, archaeological and cultural heritage significance assessments has involved examination and synthesis of readily available information held within the following key repositories:



- Wiltshire Historic Environment Record (HER) (a commercial search with a 1km buffer from the site centre, obtained in December 2025)
- The National Heritage List for England (NHLE)
- The National Archives (TNA)
- Wiltshire Know Your Place website (KYP)
- Heritage Gateway website
- The Archaeological Data Service (ADS) website
- Wiltshire Archives (WA; located at Wilts & Swindon Heritage Centre)
- Local studies libraries (Chippenham library and local studies section of Wilts & Swindon Heritage Centre)
- The Historic England Archive (HEA)
- The National Library for Scotland (NLS)
- Historic maps and images
- Aerial photographs, including inspection of images held by Historic England in Swindon, APEX, Cambridge University Air Photos, NCAP;
- Council planning records;
- A site visit and walkover surveys by the author on 5 March 2026.

14.4 This information has been used to chart both the archaeological and historical development of the Application Site and its environs in detail, enabling identification and description of all designated and non-designated heritage assets within the Application Site and its environs which may be receptors of effects from the Proposed Development. This includes a description of their component heritage values in accordance with the terminology used the latest (2024) iteration of the NPPF (MHCLG 2024, Ref. 14.13), and an assessment of their relative heritage significance utilising the hierarchy of significance proposed at Table 14.1 below.

Study Area

14.5 A study area for this assessment has been set with a buffer of 1km from the Application Site centre, which is considered sufficient for the purposes of a proportionate assessment of cultural heritage potential and significance.

Significance Criteria

14.6 The NPPF defines 'significance' in cultural heritage terms as being '*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'. One of the key lessons from this is that, in assessing value/sensitivity of heritage receptors, we need to consider the future along with the present and try to determine what will be regarded as being of value in the future.

14.7 The Heritage and Archaeology Statement (**Appendix 14.1**) identifies and describes the receptor cultural heritage assets, including a discussion of what is valued about them. The value/sensitivity of the receptor heritage assets is expressed with regard to the component elements of cultural heritage 'significance' as it is defined within the NPPF, and identified within the National Planning Policy Guidance, namely:

- **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 skill, 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.

14.8 Conservation Principles (English Heritage 2008, Ref. 14.6) defines a similar set of values, but with slightly different terminology. However, the NPPF/NPPG terminology above has been used here to define heritage values to reflect both the National Planning Policy Framework and the latest Historic England guidance. In its more recent 2019 Advice Note 12 (Ref. 14.10) '*Statements of Heritage Significance: Analysing Significance in Heritage Assets*', Historic England [its page 16] has clarified and advised that the NPPF terminology should be used in setting out an assessment of cultural heritage 'significance' for a heritage asset, rather than that identified earlier in Conservation Principles (Ref. 14.6). The assessment of heritage



values/sensitivities also includes a description of the contribution to heritage 'significance' made by an asset's setting in accordance with HEGPA3 and, where appropriate, any group value vested in the asset.

14.9 The purpose of this Chapter of the Environmental Statement is to assess the likely significant effects of the Proposed Development upon archaeological and cultural heritage assets, taking into account inherent mitigation. Both IEMA and ICOMOS guidance identify that this should be done by evaluating the heritage 'significance' or value/sensitivity of assets in accordance with a defined hierarchy, assessing the magnitude of impact, and combining the two assessments within a matrix to ascertain the significance of the effect.

14.10 In order to quantify the relative heritage value/sensitivity of cultural heritage assets – in other words to provide the defined 'hierarchy' of cultural heritage 'significance' as defined in the NPPF – the following hierarchy of heritage significance table has been adapted from ICOMOS's Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (ICOMOS 2011, Ref. 14.11), to take into account the latest (2024) iteration of the NPPF (MHCLG 2024). The ICOMOS guidance is intended as a robust and defensible system for assessing/evaluating heritage impacts.

14.11 Whilst, inevitably, some subjectivity is, at times, involved in making value judgements, value/sensitivity hierarchies have to be appreciated as continuums. There will be shades of interpretation where, for instance, an asset lies close to the borderline between the descriptions of 'high' and 'very high' heritage 'significance'. In these instances, the assessment of an asset's value/sensitivity may be expressed as 'high approaching very high' where it is considered there are attributes present that potentially uplift the basic assessment of high value/sensitivity towards, but not reaching, its borderline with very high or 'very high approaching high' where certain attributes potentially depress the basic assessment of very high value/sensitivity towards its borderline with high.

Table 14.1: Hierarchy of cultural heritage 'significance'/relative Value/Sensitivity of heritage assets

<i>Heritage Value/Sensitivity</i>	<i>Description</i>
Very High	<i>World Heritage Sites; Assets of acknowledged international importance; Assets that can contribute significantly to acknowledged international research objectives; Historic landscapes of international value (designated or not) and extremely</i>



Heritage Value/Sensitivity	Description
	<i>well-preserved historic landscapes with exceptional coherence, time depth, or other critical factor(s).</i> <i>Other buildings or urban landscapes of recognised international importance.</i>
High	Scheduled Monuments and undesignated assets of Schedulable quality and importance; Grade I and II* Listed buildings (Scotland category A); Other Listed buildings that can be shown to have exceptional qualities in their fabric or associations not adequately reflected in their Listing grade; Conservation Areas containing very important buildings; Undesignated structures of clear national importance; Designated and undesignated historic landscapes of outstanding historic interest (including Grade I and Grade II* Registered Parks and Gardens); undesignated landscapes of high quality and importance of demonstrable national value; and well preserved historic landscapes exhibiting considerable coherence, time depth or other critical factor(s); Assets that can contribute significantly to acknowledged national research objectives. Also includes non-designated heritage assets which are demonstrably of equivalent significance
Medium	Designated or undesignated assets that contribute to regional research objectives; Grade II (Scotland category B) Listed buildings; Historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical association; Conservation Areas containing important buildings that contribute significantly to their historic character; Historic townscapes or built up areas with important historic integrity in their buildings, or built settings (for example including street furniture or other structures); Designated landscapes of special historic interest (including Grade II Registered Parks and Gardens); undesignated landscapes that would justify such a designation; averagely well preserved historic landscapes with reasonable coherence, time depth or other critical factor(s); landscapes of regional value.
Low	Designated and undesignated assets of local importance including those compromised by poor preservation and/or poor survival of contextual



<i>Heritage Value/Sensitivity</i>	<i>Description</i>
	associations; Assets of limited value, but with potential to contribute to local research objectives; Locally Listed buildings (Scotland category C(S) Listed Buildings) and historic (unlisted) buildings of modest quality in their fabric or historical association; Historic townscape or built-up areas of limited historic integrity in their buildings or built settings (for example including street furniture or other structures); Robust undesignated historic landscapes; historic landscapes with importance to local interest groups; and historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations. Archaeological remains, buildings and other elements of the historic landscape which have a degree of significance meriting consideration in planning decisions, due to their heritage interest
Negligible	Assets with very little surviving archaeological interest; Buildings of little architectural or historical note; Landscapes with little significant historical interest.
Unknown potential	Archaeological remains whose importance has not been established. Buildings with some hidden (i.e. inaccessible) potential for historic significance.

Predicting effects

Assessing the Magnitude of Impact of the Proposed Development upon Heritage Assets

14.12 The methodology for assessment of the predicted magnitude of impacts of the Proposed Development upon heritage assets has also been adapted from Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (ICOMOS 2011, Ref. 14.11). The magnitude of impact table adapted from the ICOMOS guidance is set out below. Magnitude of impact, based on the change that the Proposed Development would have upon the receptor asset, is considered within the range of major, moderate, minor, negligible or no change. Consideration is given to scale, duration of impact/effect (e.g. for construction phase and operational phase) and extent of Proposed Development with reference to the definitions in Table 14.2 below.



Table 14.2: Magnitude of Impact categories used to describe impact upon heritage assets, archaeology and historic landscapes (NB: these effects can be either adverse or beneficial)

Magnitude	Criteria
Major	Change to key historic building elements, such that the resource is totally altered. Change to most or all key archaeological materials, such that the resource is totally altered. Comprehensive changes to the setting. Change to most or all key historic landscape elements, parcels or components; extreme visual effects; gross change of noise or change to sound quality; fundamental changes to use or access; resulting in total change to historic landscape character unit.
Moderate	Change to many key historic building elements, such that the resource is significantly modified. Changes to many key archaeological materials, such that the resource is clearly modified. Considerable changes to setting [of an archaeological asset] that affect the character of the asset. Changes to the setting of an historic building, such that it is significantly modified. Changes to many key historic landscape elements, parcels or components, visual change to many key aspects of the historic landscape, noticeable differences in noise or sound quality, considerable changes to use or access; resulting in moderate changes to historic landscape character.
Minor	Change to key historic building elements, such that the asset is slightly different. Changes to key archaeological materials, such that the asset is slightly altered. Slight changes to setting [of an archaeological asset] Change to setting of an historic building, such that it is noticeably changed. Changes to few key historic landscape elements, parcels or components, slight visual changes to few key aspects of historic landscape, limited changes to noise levels or sound quality; slight changes to use or access: resulting in limited changes to historic landscape character.
Negligible	Slight changes to historic buildings elements or setting that hardly affect it. Very minor changes to archaeological materials, or setting. Very minor changes to key historic landscape elements, parcels or components, virtually unchanged visual effects, very slight changes in noise levels or sound quality; very slight changes to use or access; resulting in a very small change to historic landscape character.



Magnitude	Criteria
No Change	No change to fabric or setting. No change to elements, parcels or components [of historic landscape]; no visual or audible changes; no changes arising from in amenity or community factors.

Assessing the Significance of Effect of the Proposed Development upon Heritage Assets

14.13 Using the preceding assessment of the cultural heritage value/sensitivity or heritage 'significance' of the heritage asset for weighting purposes and the magnitude of the impact determined from the table above, the significance of the effect after mitigation has been assessed using the matrix shown in Table 14.3 below. Where two alternatives are given in this table, professional judgement is used to decide which best reflects the significance of the effect of the impact identified.

Table 14.3: Significance of Effects Matrix

Significance of Effects Matrix						
Heritage Value	Very High	Neutral	Slight	Moderate/large	Large or very large	Very large
	High	Neutral	Slight	Moderate/slight	Moderate/large	Large/very large
	Medium	Neutral	Neutral/slight	Slight	Moderate	Moderate/large
	Low	Neutral	Neutral/slight	Neutral/slight	Slight	Slight/moderate
	Negligible	Neutral	Neutral	Neutral/slight	Neutral/slight	Slight
		No Change	Negligible	Minor	Moderate	Major
		Magnitude of Impact				

14.14 The significance of effects from impacts read from Table 14.3 can be positive or negative. Thus, for example, where proposals affect the setting of a heritage asset of high value (say a Grade II* listed building) to the extent that that setting is significantly modified (a moderate magnitude of impact), the significance of the effect of the proposal on the setting of the heritage asset will be deemed to be moderate or large (with precise determination being dependent upon professional judgement) and beneficial or adverse depending upon circumstance.



Construction Assessment

14.15 Construction phase impacts are assessed in line with the methodology set out above.

Operational Development Assessment

14.16 Operational phase impacts are assessed in line with the methodology set out above.

Assessment Thresholds / Significance of Effect

14.17 The level of effect considered to be significant in Environmental Impact Assessment terms for Archaeology and Cultural Heritage is considered to occur in those cases where effects are assessed as Moderate or greater.

Significance of Residual Effects

14.18 The significance of residual effects has been assessed in line with the methodology set out above.

Cumulative Effects Assessment

14.19 The cumulative impacts of four other approved or planned developments identified in Chapter 3 have been considered as part of the cultural heritage and archaeological impact assessment processes.

Consultation

14.20 There are no heritage or archaeological assets within the Application Site or its environs which require engagement with statutory consultees. Wiltshire Council was consulted on an earlier iteration of the Proposed Development by means of a pre-application enquiry submitted in 2024 (Ref. ENQ/2024/01667), seeking outline advice for a hybrid mixed-use residential-led development. The Council's response, received in December 2025, sets out its position on heritage at pages 11-12, and on archaeology at page 13. In summary, the proposals were not supported on heritage/conservation grounds due to the lack of parameter/block plans, storey heights, landscape strategy and a Heritage Statement (including a settings assessment) providing clear and convincing justification for development within the setting of the Grade II-listed Hawkeridge Farmhouse. This is notwithstanding the fall-back position provided by the consented 2014 business park scheme and subsequent reserved



matters applications in which a larger-scale development within closer proximity to the listed building was approved, subject to a requirement for mitigation by landscaping works which have since, demonstrably, been implemented. A detailed Heritage Statement, including a settings assessment and impact assessment for Hawkeridge Farm, has since been undertaken by Bristol & Bath Heritage Consultancy Ltd and is included at **Appendix 14.1**.

14.21 Archaeological evaluation of the Application Site in advance of the 2014 business park application had identified a spread of medieval and post-medieval pottery across the Site, with a concentration in the NE corner and archaeological monitoring of topsoil stripping of that part of the Site had been requested to be secured by condition on the 2014 application. The Council's pre-application response advised that a Written Scheme of Investigation (WSI) should be prepared to accompany any future planning application, setting out the methodology for archaeological monitoring of groundworks in this area. A WSI has therefore been prepared and is included as **Appendix 14.3**. The Council's pre-application response advised that the monitoring work could be secured via a condition attached to the planning consent. An Archaeological Desk-Based Assessment was also identified among the list of documents to be prepared for any future planning application: this has been prepared by Bristol & Bath Heritage Consultancy in the form of a 'Heritage and Archaeology Statement' included at **Appendix 14.1**.

Assumptions and Limitations

14.22 Archaeological significance assessments are necessarily provisional, based on the results of previous archaeological evaluations which are, by nature, a sample of the Application Site. A proposed programme of archaeological monitoring in the NE of the Application Site, intended to record and evaluate the significance of identified buried archaeological remains within that part of the Proposed Development, is set out by way of a Written Scheme of Investigation (WSI) included at **Appendix 14.3**. This is intended to enable the provisional significance assessments to be updated and our understanding of the Application Site's archaeological resource to be advanced and disseminated to both the public and the archaeological profession in line with the requirements of NPPF (2024) Paragraph 218. Other archaeological remains may be identified through the further archaeological monitoring works that have not been thus far identified through the desk-based assessments and evaluations undertaken prior to this study.

14.23 The assessment of the archaeological and cultural heritage baseline and the resultant assessment of potential effects, including cumulative effects with other schemes, is based on



information reasonably available at the time of writing. Reliance has had to be placed on the adequacy and veracity of information generated by third parties in all such instances.

LEGISLATION, PLANNING POLICY AND GUIDANCE

Legislation

14.24 The key legislation applying to archaeology and cultural heritage in England is:

- The National Heritage Act 1983 (Amended 2002)
- The Planning (Listed Buildings and Conservation Areas) Act 1990
- The Ancient Monuments and Archaeological Areas Act 1979

14.25 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 is particularly relevant in this instance, as it places a duty upon the local planning authority (or Secretary of State) to have special regard to the desirability of preserving listed buildings or their settings, or any features of special architectural or historic interest which they possess, in considering whether to grant planning permission.

National Planning Policy Framework

14.26 The National Planning Policy Framework (NPPF) December 2024 (MHCLG 2024 (with minor amendments 7 Feb. 2025), Ref. 14.13) sets out the Government's planning policies for England and how these are expected to be applied. It includes requirements for the protection of the historic environment (Section 16. Conserving and enhancing the historic environment).

Definition of what constitutes a Heritage Asset

14.27 NPPF (2024, Ref. 14.13), 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

14.28 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

14.29 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 locally-listed buildings, heritage assets at risk and parks and gardens not nationally protected by virtue of being on the NHLE register.

The Significance of Heritage Assets

14.30 NPPF (2024) Paragraph 207 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.*

14.31 NPPF (2024), 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

14.32 Archaeological Interest is also defined in NPPF (2024), 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 (2024) provides a distinction between: *designated heritage assets of the highest significance; designated heritage assets not of the highest significance; and non-designated heritage assets.*



Heritage harm

14.33 NPPF (2024) describes harmful effects to the significance of heritage assets as either ‘substantial harm’ or ‘less than substantial harm’, but 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.* The Planning Practice Guidance (PPG; Ref. 14.12) provides further guidance on interpretation of substantial harm:

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.

Planning Practice Guidance 23/07/2019: Paragraph: 018 Reference ID: 18a-018-20190723

14.34 NPPF (2024) Paragraph 212 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.*

14.35 NPPF (2024) Paragraph 213 requires that: *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.*

14.36 The basis for clear and convincing justification is set out in NPPF Paragraphs 213-215, beginning with Paragraph 213, which identifies that 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 gardens, and World Heritage Sites, should be wholly exceptional.*

14.37 NPPF (2024) Paragraph 214: *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.

14.38 For less than substantial harm to designated heritage assets, NPPF (2024) Paragraph 208 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.

14.39 NPPF (2024) paragraph 216 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.*

14.40 Where harm is accepted, be it substantial or less than substantial, NPPF (2024) paragraph 218 advocates 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.*



14.41 NPPF (2024) paragraph 220 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 208 or less than substantial harm under paragraph 207, 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

14.42 Not all developments affecting heritage assets will lead to harm to those assets, and the NPPF clarifies that change either within areas designated as heritage assets, or within the settings of heritage assets, may lead to heritage benefit.

14.43 NPPF (2024) Paragraph 212 advocates 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.*

14.44 Historic England Good Practice Advice Note 3 (GPA3) notes that ‘good design may reduce or remove the harm, or provide enhancement’ (GPA3, paragraph 28). English Heritage’s Conservation Principles (EH 2008, Ref. 14.6) 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 (EH 2008, Paragraph 84). Specific heritage benefits may be presented through activities such as repair or restoration, as set out in Conservation Principles (Ref. 14.6).

Local Planning Policy

Wiltshire County Council Planning Policy

14.45 At the time of writing the impact assessment for this report (June 2026) the emerging Wiltshire Local Plan had recently been withdrawn from examination. The Wiltshire Core Strategy Development Plan Document (DPD), adopted January 2015, therefore remains the primary document detailing policy on the Historic Environment in the County. The key archaeology and cultural heritage policies from this document are detailed below.



Wiltshire Core Strategy Policy CP57

Ensuring high quality design and place shaping

A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through:

- i. enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development and responding to local topography by ensuring that important views into, within and out of the site are to be retained and enhanced*
- 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*
- v. the maximisation of opportunities for sustainable construction techniques, use of renewable energy sources and ensuring buildings and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, in accordance with Core Policy 41 (Sustainable Construction and Low Carbon Energy)*
- vi. making efficient use of land whilst taking account of the characteristics of the site and the local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area*
- vii. having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are*



achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter)

viii. incorporating measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area through the creation of visually attractive frontages that have windows and doors located to assist in the informal surveillance of public and shared areas by occupants of the site

ix. ensuring that the public realm, including new roads and other rights of way, are designed to create places of character which are legible, safe and accessible in accordance with Core Policy 66 (Strategic Transport Network)

x. the sensitive design of advertisements and signage, which are appropriate and sympathetic to their local setting by means of scale, design, lighting and materials

xi. taking account of the needs of potential occupants, through planning for diversity and adaptability, and considering how buildings and space will be used in the immediate and long term future

xii. the use of high standards of building materials, finishes and landscaping, including the provision of street furniture and the integration of art and design in the public realm

xiii. the case of major developments, ensuring they are accompanied by a detailed design statement and masterplan, which is based on an analysis of the local context and assessment of constraints and opportunities of the site and is informed by a development concept, including clearly stated design principles, which will underpin the character of the new place

xiv. meeting the requirements of Core Policy 61 (Transport and New Development).

Wiltshire Core Strategy Policy CP58

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:

- i) nationally significant archaeological remains*



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- ii) *World Heritage Sites within and adjacent to Wiltshire*
 - iii) *buildings and structures of special architectural or historic interest*
 - iv) *the special character or appearance of conservation areas*
 - v) *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.

Draft Heywood & Hawkeridge Neighbourhood Plan (2020 to 2036)

- Environment Objective 4 - Historic Buildings: Support the conservation of listed buildings and the listed monument
- Environment Policy EP5: Promote access and interest in the historic buildings and monuments. Development proposals which are for or which result in improvements to accessibility to heritage assets will be supported in principle

Guidance

14.46 Guidance followed in the preparation of this chapter and supporting technical appendices includes:

- Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment (EH 2008, Ref. 14.6)
- Statements of Heritage Significance: Analysing Significance in Heritage Assets (HEAN12; Historic England 2019, Ref. 14.10)



- Standard and Guidance for Historic Environment Desk-Based Assessment (ClfA 2014, updated 2017 and 2020, Ref. 14.5)
- Good Practice Advice in Planning Note 2: Decision-Taking in the Historic Environment (HEGPA 2; Historic England 2015, Ref. 14.8)
- Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (HEGPA 3; Historic England 2017, Ref. 14.9)
- Planning Practice Guidance (MHCLG 2016, last updated 14 February 2024, Ref. 14.12)

BASELINE CONDITIONS

14.47 A detailed Heritage and Archaeology Statement prepared to accompany the planning application and support this chapter is included as Technical Appendix 14.1. This sets out the current baseline conditions in detail, with accompanying figures at **Appendix 14.2**.

Site Topography and Geology

14.48 The ground level within the northern section of the Application Site is generally level at around 51m AOD but rises gently towards the northwestern boundary to around 54m AOD and falls to around 47m near the brook at the eastern boundary with the kennels north of Hawkeridge Mill. The southern part of the Application Site rises gently from around 48m AOD in the northeast to 52m AOD in the northwest, and rises more markedly towards the southernmost end of the Site to around 57m AOD. The underlying bedrock geology of the Application Site is mapped as Oxford Clay Formation mudstone, sedimentary rocks formed in the Jurassic period (between 166,100,000 and 157,300,000 years ago) which are shallow-marine in origin. They are detrital, ranging from coarse- to fine-grained (locally with some carbonate content) forming interbedded sequences. This is mapped as being overlain by superficial deposits of alluvium - comprised of clay, silt, sand and gravel – running in a broad swathe parallel with the course of the brook at the eastern side of the northern land parcel and covering much of the southern land parcel. These sedimentary deposits are fluvial in origin. They are detrital, ranging from coarse- to fine-grained and form beds and lenses of deposits reflecting the channels, floodplains and levees of a river (BGS 2026, Ref. 14.4).



Summary of the archaeological and historical development of the Application Site

Prehistoric (Figs 14.3, 14.7 & 14.9)

14.49 During a 2011 archaeological evaluation within the present Application Site eleven sherds of residual later prehistoric pottery were identified, possibly all from a single vessel of probable early/middle Iron Age date, although no prehistoric features have been identified within the Application Site by this or any other archaeological investigations (WA 2011, 10. Ref. 14.15). Within the wider 1km study area, prehistoric finds and features ranging from Neolithic to Late Bronze Age in date have been encountered during archaeological investigations beyond the boundaries of the present Application Site to the west, southwest, south and southeast (TA 14.1, paras 4.12-4.17).

Roman (Figs 14.3, 14.7 & 14.9)

14.50 A single sherd of residual coarse greyware pottery was recovered from an archaeological trench in the NE of the northern land parcel during the 2011 evaluation of the Application Site (WA 2011, 10, Ref. 14.15), with a further two sherds recorded in the NW of the southern land parcel during a 2004 evaluation for the proposed Westbury Eastern Bypass (MWI1510). No Roman features have been identified within the Application Site through these previous investigations.

14.51 Roman settlement activity, field systems and human burials have been identified within the wider 1km study area during investigations to the west, southwest and south of the Application Site. In the Heritage and Archaeology Statement (**Appendix 14.1**, para 4.20) it was noted that this activity and the areas in which prehistoric activity has been recorded appear to correspond directly with fields which include the word 'Ham' in their names at the tithe apportionment and lie close to the area currently called 'The Ham', which typically indicates an enclosure or settlement by a river (from the Old English *ham*: Field 1972, 96). In this case, the area lies broadly between the Biss Brook to the west and the Bitham Brook to the east. The Application Site appears to lie at least 80m beyond the boundary of historic area known as 'The Ham', which probably explains the absence of prehistoric and Roman features and the very low quantum of prehistoric and Roman pottery found within the Application Site during 2003/4 and 2011 field evaluations despite the apparent proximity of settlement activity of those periods.



Early medieval & medieval (Figs 14.4, 14.7 & 14.9)

14.52 Archaeological evaluation of the Application Site in 2011 (EWI7293) identified medieval pottery of primarily 12th-14th-century date, much of it found in features which also contained post-medieval pottery such that it was not possible to confidently attribute any features to the medieval period. Remnants of ridge and furrow cultivation were identified in the southern land parcel, and a cluster of ditches, drains and spreads of material was found in the northern land parcel. Possible structural remains were found in the north-central part of the northern land parcel in association with residual 12th- to 14th-century pottery, suggesting the possibility that the post-medieval remains may have had medieval origins (WA 2011, Ref. 14.15).

14.53 Medieval features and finds have been identified in the wider 1km study area, including a scheduled medieval moated enclosure at West Wiltshire Trading Estate (MWI1517), a network of ditches at West Wiltshire Trading Estate (MWI78059) and settlements at Hawkrigde (MWI1526: first recorded in 1368) and Heywood (MWI1525) (TA 14.1, paras 4.21-4.25).

Post-medieval to modern (Figs 14.2, 14.5, 14.7 & 14.9)

14.54 The 2004 Westbury By-pass evaluation identified a large post-medieval pit, possibly a quarry pit, within the Application Site (Trench 111; MWI1564). The farmstead of Hawkeridge Farm is recorded as a partially extant 19th-century farmstead of loose courtyard plan (MWI70266). The farm itself was subject to historic building recording in 2012 (MWI70266) which identified that it has a 17th-century core with substantial additions and alterations in the late 18th/early 19th century and again in the mid-19th century; further outbuildings were added in the 19th century and refurbishment work was undertaken in the 20th century (TVAS 2012, Ref. 14.14).

14.55 Hawkeridge Mill (MWI1616), close to the eastern site boundary, is shown on the 1808 Westbury Enclosure map (not illustrated); it was a fulling mill in 1823 owned by Matravers of Westbury. On the tithe map (Fig. 14.10b) it is an L-shaped building, with the accompanying apportionment showing that, in 1842, it was owned by William Matravers and occupied by Jacob Weeksm being described as a cloth mill. Part of it was refurbished and extended in 1983 (Wiltshire Planning Reference W/83/01144/FUL) and it was subsequently converted from mill usage to residential accommodation in 1988 (Wiltshire Planning Reference W/87/01656/FUL), including creation of two flats and a semi-detached building (Wiltshire Planning Reference W/88/00990/FUL). Since then conservatories and extensions have been



added (Wiltshire Planning Reference W/05/01588/FUL), it has been further sub-divided with the east/west range, which is clearly separated from the north/south range, converted into two dwellings (Wiltshire Planning Reference 17/11715/FUL). Ownership of the buildings has potentially been further sub-divided since then (Wiltshire Planning Reference 18/03732/VAR). Although an L-shaped building survives, this has clearly been much altered and extended, if not rebuilt. It is now rendered, seemingly re-roofed with solar panels on the south-facing roof slope, and has many UPVC windows, such that its historic character is now impossible to discern. Its architectural value is lost, and it essentially reads as a modern building. Blenches Mill (MWI1617), to the southeast, was a water mill established by 1773. The Wiltshire, Somerset and Weymouth Railway (MWI79700) was established to the east of the Application Site by 1848 and is first shown on the 1887 Ordnance Survey (Fig. 11). A railway junction (MWI77590) was established to the south of the Application Site with a curving western loop opened in the 1930s to serve the military supply depot (MWI78722) at what is now the West Wiltshire Trading Estate.

14.56 Grade II-listed Court Farm, Hawkeridge (MWI70264), 340m NW of the Application Site, is of late 17th-century origin. Grade II-listed 5, Hawkeridge (NHLE 1021503) has a datestone reading 1741. Other post-medieval features recorded by the NHLE and HER within the 1km study area include the Grade II-listed mid-19th-century Church of Holy Trinity at Heywood (NHLE 1021503), along with a number of houses, farms and farmsteads, water meadows and ridge and furrow earthworks.

Undated (Figs 14.6 & 14.7)

14.57 The HER records a number of 'undated' features within the Application Site, including an undated field system (MWI1608), plotted from aerial photographs, and undated field boundaries, some of which appear to correspond with those shown on the Tithe Map and later maps (MWI74595), together with undated enclosures (MWI74594) and pits (MWI74596). Most of these features were identified by a 2011 geophysical survey (EWI6832) and were subsequently investigated in 2011 by Wessex Archaeology (EWI7293). Where investigated, 'field system' MWI1608 appeared to be post-medieval in date and, along with parts of MWI74596, incorporated some French drains as well as field boundaries; the southern part of MWI74595 was identified as a spread of modern material most probably associated with construction of the railway embankment adjacent to it. The northern enclosure, MWI74594, was dated to the post-medieval period and corresponded with field boundaries on the 1887 Ordnance Survey. Some early- to middle-Iron Age pottery came from some of the features within it, which was suggested to be residual in a post-medieval context. Medieval pottery and plough-damaged structural remains were also recovered from features comprising MWI74594



(WA 2011, 7. Ref. 14.15). Ditches forming part of MWI74595 mostly produced post-medieval pottery, with medieval pottery from the upper fill of one ditch and a spread of material with both medieval and post-medieval pottery. Parts of MWI74595 in the northeast of the Application Site represent the ditched boundaries of a former driveway recorded on the Tithe Map and accompanying apportionment (Fig. 14.10b).

14.58 Further undated pits, ditches, postholes, field boundaries and a ring-ditch are recorded by the HER in the wider 1km study area, to the SE, SW and W of the Application Site (Fig. 14.6).

Previous archaeological investigations (Fig. 14.7)

14.59 The Application Site has been subject to site-specific archaeology and cultural heritage assessment (Entran 2008, Ref. 14.7), geophysical (Magnetometer) survey (EWI6832: Archaeological Surveys 2011, Ref. 14.3) and archaeological evaluation by trial trenching (EWI7293; WA 2011, Ref. 14.15), all undertaken in relation to a 2014 business park planning application (Ref. 14/03118/OUT) and summarised in a report prepared for that application by Archaeological Planning Solutions (APS 2013, Ref. 14.1). The APS report also summarises the potential impacts of the business park development upon the archaeological resource.

14.60 The archaeological assessment identified; the presence of undated cropmarks within both areas of the Application Site, those in the north apparently part of a field system pre-dating 1842; prehistoric and Roman activity within the Site environs; two surviving historic field boundaries within the Site; the presence of the Grade II-listed Hawkeridge Farmhouse between the northern and southern land parcels (Entran 2008, Ref. 14.7).

14.61 The geophysical survey identified a number of anomalies in the northern land parcel. Some corresponded with zones of magnetic debris and may relate to spreads of medieval and post-medieval pottery seen at the time of the survey. The route of a former driveway, still used as a public right of way, was defined by two positive linear anomalies and a zone of magnetic debris which appeared to correspond with a linear spread of burnt limestone fragments. Other linear anomalies of uncertain origin within the Application Site were thought likely to relate to former agricultural activity and infilled boundary ditches (Archaeological Surveys 2011, Ref. 14.3).

14.62 The trial trenching comprised 16 trenches which targeted anomalies identified in the geophysical survey. A small concentration of early/middle Iron Age pottery was found in the central-northern part of the northern land parcel (in Trench 2), but this appeared to be residual



material within a probably post-medieval date. Medieval pottery of primarily 12th-14th-century date was recovered, but usually from features which also contained post-medieval pottery such that it was not possible to confidently attribute any features to the medieval period. Remnants of ridge and furrow cultivation were identified in Trench 10, in the southern land parcel, and a cluster of ditches, drains and spreads of material was found in Trench 6, in the northern land parcel, which two trenches accounted for nearly two-thirds of the medieval material from the evaluation. Most of that within Trench 6 was thought to be residual within a later context. Post-medieval features were the dominant features, with the most noteworthy concentration in the area of Trenches 7 and 8, in the northwestern part of the southern land parcel, southwest of Hawkeridge Farm. Possible structural remains were found in the north-central part of the northern land parcel in Trench 2 in association with residual 12th- to 14th-century pottery, suggesting the possibility that the post-medieval remains may have had medieval origins.

14.63 Subsequent to the above reports and investigations there have been a further 22 archaeological reports or investigations within the 1km study area, including a built heritage assessment of Hawkeridge Farm in 2011 (EWI7197; Fig. 14.7).

Historic Landscape Character (Figs 14.8, 14.17 & 14.18)

14.64 The historic landscape character of the Application Site is examined in detail at Section 5 of the Heritage and Archaeology Statement at **Appendix 14.1**. In summary, the Application Site lies entirely within an area classified as 'amalgamated fields', created by the boundary removal of smaller fields to former larger ones, mainly since the 19th-century and usually since the Second World War, which is usually done to ease mechanised working and increase productivity. Map regression (TA 14.1, paras 4.32-4.36 & Figs 14.10a-14.18) has established many changes to the field pattern around Hawkeridge Farm, coupled with the changes to the farm itself and extensive alterations to nearby Hawkeridge Mill. These changes have resulted in a considerable loss of legibility and integrity in the historic landscape, with only two of the 17 historic internal field boundaries shown on the 1808 Inclosure map (Fig. 14.10a), a wet ditch in the southern land parcel and a hedgerow in the north, surviving within the Application Site. Freely available satellite imagery demonstrates that the northern hedgerow was cut down between 2016 and 2021 as part of works carried out in respect of the 2014 business park application and has since been re-planted.



The identification and heritage 'significance' of archaeological and cultural heritage assets considered to be potential receptors of effects from the Proposed Development

14.65 Section 6 of the Heritage and Archaeology Statement (**Appendix 14.1**) has identified the archaeological and cultural heritage assets considered capable of impacts from the Proposed Development, when implemented, including the scoping in/out of receptors considered capable of receiving effects to the heritage significance contributed by their settings at Paras 6.14-6.15. Section 7 of **Appendix 14.1** describes the cultural heritage 'significance' (value/sensitivity) of the scoped in receptors using the package of heritage values identified by the NPPF and advocated by Historic England (HE 2019, Ref. 14.10), namely their **archaeological, architectural, artistic or historic** interest, as well as the **contribution made to heritage significance by setting**. For the purposes of this assessment the relative heritage value or sensitivity of the assets thus identified has been graded using the hierarchy of [heritage] significance presented at Table 14.1 above. The results of this process are summarised in Table 14.4 below.

Table 14.4 – The Relative Heritage Value or Sensitivity of the Cultural Heritage Receptors identified in the Heritage and Archaeology Statement (TA14.1)

Asset Name	Asset Type	Asset Grade	Sensitivity
Hawkeridge Farmhouse [NHLE 1021504]	Listed Building	Grade II	Medium
MWI1608 Undated Field System, West of Hawkeridge Mill	Historic Environment Monument		Low
MWI74594 Undated Enclosures, West of Hawkeridge Mill	Historic Environment Monument		Low
MWI74595 Undated Field Boundaries, West of Hawkeridge Mill	Historic Environment Monument		Low
MWI1510 Romano-British Pottery, South West of Hawkeridge Farm	Historic Environment Monument		Low
MWI1564 Post Medieval Quarry Pit, South West of Hawkeridge Farm	Historic Environment Monument		Low
MWI74596 Undated Pits, West of Hawkeridge Mill	Historic Environment Monument		Low

14.66 It was noted at 7.21 of the Heritage and Archaeology Statement (**Appendix 14.1**) that some elements of the buried archaeological remains identified as Historic Environment Monuments above could, potentially, be elevated to **medium** significance, should the proposed further archaeological mitigation work in the NE of the Application Site set out at **Appendix 14.3** identify archaeological finds or features which prove capable of addressing regional research objectives such as those set out in the South West England Research Framework (SWARF; Webster 2007, Ref. 14.16).



IDENTIFICATION AND EVALUATION OF KEY EFFECTS

Introduction

14.67 The archaeological and cultural heritage assets identified as potential receptors of effects from the Proposed Development, and their relative heritage value or sensitivity, have been summarised at Table 14.4 above. This section will now identify and discuss potential effects for both the construction (temporary, but may be long-term) and operational (permanent) phases of the Proposed Development, summarising and building upon the detailed analyses presented in the detailed Heritage and Archaeology Statement at **Appendix 14.1**.

Predicted Impacts

Construction Effects

Built heritage

14.68 The indirect effects of the Proposed Development upon the setting of the Grade II-listed Hawkeridge Farmhouse will vary considerably throughout the construction programme, and these effects will be experienced to varying degrees from different locations as development progresses, rendering it impossible to attempt any meaningful settings assessment for construction phase impacts. That being said, harmful effects of a temporary nature are likely to arise in terms of noise, vibration, dust generation and visual changes resulting from the construction process, with adverse visual effects steadily increasing over time as any new buildings which will be intervisible with the farmhouse (mostly the residential units to the north and south of it) rise from their foundations to full height, steadily reducing the experience and appreciation of what remains of the wider agricultural setting of the listed building currently available in views to and from the farmhouse. However, many of these effects will be temporary and variable during the construction phase. The significance of potential indirect effects from the Proposed Development upon the setting of Hawkeridge Farmhouse are therefore considered more fully under the Operational Phase assessment below, at the point where development has reached its final form and the effects become permanent, but at most would constitute a **slight adverse** significance of effect when applying the matrix at Table 14.3, which is not considered to be Significant in Environmental Impact terms.



Buried archaeological remains

14.69 The Construction Phase will have direct, permanent effects upon archaeological heritage assets in the form of buried archaeological remains that previous archaeological investigations have demonstrated lie within the Application Site, with a concentration within the northeast of the Site. These will inevitably be damaged or removed in areas where there are to be construction groundworks, landscaping and planting, resulting in permanent adverse effects. The buried archaeological remains identified as potential receptors of effects during this phase and their provisional heritage value/sensitivity are set out at Table 14.5 below.

Table 14.5 – Known archaeological remains subject to potential direct effects during construction phase

Asset Name	Sensitivity
MWI1608 Undated Field System, West of Hawkeridge Mill	Low
MWI74594 Undated Enclosures, West of Hawkeridge Mill	Low
MWI74595 Undated Field Boundaries, West of Hawkeridge Mill	Low
MWI1510 Romano-British Pottery, South West of Hawkeridge Farm	Low
MWI1564 Post Medieval Quarry Pit, South West of Hawkeridge Farm	Low
MWI74596 Undated Pits, West of Hawkeridge Mill	Low

14.70 The above list cannot be considered to be definitive; other, as-yet unidentified archaeological remains of presently unknown significance may be found to be present during the course of the planned archaeological mitigation works, the proposed scope of which is set out in a Written Scheme of Investigation included as **Appendix 14.3**, building upon the APS (2014, Ref. 14.2) Written Scheme of Investigation for an area of archaeological investigation put forward in respect of the archaeological condition attached to the approved 2014 business park application. However, all present indications are that the buried archaeological resource within the Application Site is of **low** heritage significance. Construction-phase works are predicted to result in a considerable degree of alteration to the buried archaeological resource, leading to a **major adverse** magnitude of impact in accordance with the criteria at Table 14.2. This results in a **slight/moderate adverse** significance of effect when applying the matrix at Table 14.3, which is not considered to be Significant in Environmental Impact terms.



Operational Effects

Built heritage

14.71 Potential indirect development effects upon the setting of the Grade II-listed Hawkeridge Farmhouse have been assessed in accordance with Steps 3-5 of HEGPA 3 at paras 8.16-8.21 of the Heritage and Archaeology Statement (**Appendix 14.1**). In summary, despite considerable maturation of the planting scheme implemented in respect of the 2014 business park consent, which has resulted in a good degree of screening between the farmhouse and much of the Application Site, there will be some seasonally variable intervisibility of the Proposed Development with the farmhouse in filtered or oblique views which will reduce the sense of open pastureland surrounding the farm, along with changes to noise levels and lighting, ultimately leading to an increased sense of urbanisation within its setting. This will be mostly experienced in the form of domestic dwellings proposed to the north and south of the farmhouse, which are of a notably smaller and more human scale than the fall-back position of commercial development of buildings of 10m to 13m eaves height approved following the 2014 business park outline consent and through subsequent reserved matters applications (effects in comparison with these applications are discussed at paras 8.16-8.21 of the Heritage and Archaeology Statement (**Appendix 14.1**)). As a result, there is considered to be a low level of residual level of harm to the extensive wider setting of the farmhouse, whilst the more immediate setting of the farmhouse is retained with increased buffer zones between new development and the listed building compared to the those set out in the parameters (Parameters Plan Revision C (included as Plate 22 in **Appendix 14.1**) approved in the 2014 outline consent. The immediate setting of the farmhouse will be preserved, with views of its key elevations framed – as intended - by the planting established in respect of the approved 2014 business park development, which also provides a good degree of inherent mitigation to the wider setting. Furthermore, much of the extensive historic farmland associated with the farmhouse (c. 50ha at the tithe apportionment) will be unaffected by the development, which occupies c. 8.5ha of that area. The wider, mostly pastureland setting of the farmhouse is assessed as making a modest contribution to its overall heritage significance at **Appendix 14.1**. The historic field system associated with the farmhouse has been greatly eroded by modern farming practices, such that the land within Application Site itself now makes only a limited contribution to the significance the farmhouse derives from its setting. Despite this, and the implementation of the landscaping scheme associated with the 2014 business park outline application which has resulted in considerable screening between the Application Site and framing of views of the listed building, the visual changes to the setting of the farmhouse will certainly be noticeable in various views to and from it, as may be changes to noise levels, lighting etc from a relatively proximate development. These effects



will be mitigated to some extent by the generous buffer zones between the farmhouse and new development but will, nevertheless, doubtless result in a noticeably increased sense of urbanisation in the wider setting of the farmhouse which is considered likely to result in a **minor adverse** magnitude of impact in accordance with Table 14.2. This results in a **slight adverse** significance of effect when applying the matrix at Table 14.3, which is not considered to be Significant in Environmental Impact terms.

Buried archaeological remains

14.72 The construction phase effects upon archaeological remains, assessed above, are deemed to be permanent. Therefore, once the Proposed Development is operational there are not anticipated to be any further effects upon archaeological remains.

ASSESSMENT OF CUMULATIVE EFFECTS

Introduction

14.73 Five schemes have been identified in Chapter 3 for consideration of cumulative effects. For ease of reading, those relevant for consideration within this chapter are outlined below:

- Glenmore Farm - outline permission for up to 145 No. dwellings (PL/2021/03749)
- Land off Storridge Road - outline application submitted (Ref: PL2026/03375) for up to 165 No. dwellings.
- Land at Shallow Waggon Lane - an outline application for up to 70 No. dwellings being prepared for submission later in 2026
- Court Farm - Class Q prior approval for a barn conversion to 8 No. dwellings (PL/2025/07517).

Built heritage

14.74 Due to existing topography, built form and vegetation there are no views/intervisibility to/from the Grade II-listed Hawkeridge Farmhouse and these sites which could be affected, and therefore there are no cumulative visual effects upon the significance of the built heritage. Parts of the Glenmore Farm and Shallow Wagon Lane sites totalling c. 9ha in area fall within the extent of the historic farmland (c. 50ha in extent) associated with Hawkeridge Farmhouse at the time of the tithe map. Although the cumulative developments would not be visually perceptible from the farmhouse, they will further erode its wider historic setting by virtue of the



loss of some of the remaining open fields either side of Hawkeridge Road which currently form the approach to Mill Lane from the south. This would lead to a slightly elevated adverse cumulative effect upon the significance of Hawkeridge Farmhouse through further loss of its associated historic farmland, but it is considered that the adverse effect remains within the **minor adverse** magnitude of impact in accordance with Table 14.2 due to the preservation of the farmhouse's immediate setting, from within which the cumulative developments will not be perceptible, and the retention of all of its inherent archaeological, architectural and historic values from which the vast majority of its heritage significance is presently derived. This result is a cumulative **slight adverse** significance of effect upon the heritage significance of Hawkeridge Farmhouse when applying the matrix at Table 14.3, which is not considered to be Significant in Environmental Impact terms.

Buried archaeological remains

14.75 None of the cumulative developments can directly affect the buried archaeological remains known to lie within the Application Site, and none of those remains appear to extend beyond the Application Site into any of the cumulative development sites. There are therefore considered to be no cumulative effects upon archaeological remains.

INTER-RELATIONSHIP EFFECTS

14.76 There are potential inter-relationships with the Landscape and Visual Amenity chapter (Chapter 10), in the sense that Hawkeridge Farmhouse may be identified as a receptor in both chapters. However, the cultural heritage and landscape/visual assessments each follow methodologies appropriate to those disciplines and these are not inter-reliant. There are no identified inter-relationship effects with other topics.

ENHANCEMENT, MITIGATION AND RESIDUAL EFFECTS

Construction Phase

Archaeological Mitigation Measures

14.77 Implementation of the proposed programme of archaeological mitigation works set out within the Written Scheme of Investigation at **Appendix 14.3** will ensure that the most significant archaeological remains - in the northeast of the Application Site - are investigated and recorded to professional standards and in a manner proportionate to their importance, as was intended with respect to the 2014 business park consent. It will also ensure the results



and project archive are made available both to the public and the archaeological profession, thus enabling our understanding of the archaeological resource to be advanced in accordance with the requirements of NPPF (2024) paragraph 218. Given the low sensitivity of the archaeological remains, the additional archaeological knowledge and advancement in understanding gained from this course of action is considered likely to be sufficient to offset the assessed **slight/moderate adverse** significance of effect prior to mitigation, reducing the residual effects to **neutral**.

Operational Phase

Built Heritage Mitigation Measures

14.78 Whilst consideration could be given to further planting in hedge/tree gaps close to the Grade II-listed Hawkeridge Farmhouse to mitigate adverse visual effects, further enclosure of the farmhouse with planting could lead to overshadowing and, on balance, it is felt the existing planting is sufficient. As noted above, the inherent mitigation associated with the proposed planting around the retail units and drive thru to the northwest of the farmhouse should soften the effects of new development seen from the farmhouse when looking in this direction - in which modern buildings and parking areas forming part of the West Wiltshire Trading Estate already feature prominently.

14.79 In the proposed residential areas in closer proximity to the farmhouse a suitable complimentary material palette (tiled or slate-effect roof coverings, chimney stacks, brick, pale stone and/or rendered/part rendered elevations, potentially mixed with some timber-clad elevations, given the adjacent farmyard context) and the use of neutral colours could be employed to further mitigate any residual harm to the farmhouse's setting. At present, the dwellings most adjacent to the listed building fall within the 'rural edge' character area, for which red multibrick and reconstituted Cotswold stone elevations with red Double Roman and slate effect concrete roof tiles are currently proposed, which should provide a suitable material and colour palette. Nevertheless, the urbanisation of the farmhouse's setting would remain and therefore mitigation through design and landscaping is unlikely to significantly shift the dial on residual effects below the **slight adverse** significance of effect assessed above.

Archaeological Mitigation Measures

14.80 Following construction phase implementation of the programme of archaeological mitigation works set out within the Written Scheme of Investigation at **Appendix 14.3** there



would be no further scope or requirement for archaeological mitigation during the operational phase and therefore there are no residual effects during the operational phase.

SUMMARY

14.81 Overall, the Proposed Development will have limited effects upon the Archaeology and Cultural Heritage of the Application Site and its environs.

14.82 The only adverse effect identified with respect to built heritage relates to indirect effects upon the contribution made by setting to the significance of the Grade II-listed Hawkeridge Farmhouse through the loss of associated historic farmland and field boundaries. The majority of the building's heritage significance is vested in its architectural and historic special interests for which it is listed: these special interests will remain unaffected. Setting makes a modest contribution to the listed building's overall heritage significance. The key elements of setting – the immediate setting of Mill Lane, the garden to the south of the farmhouse and the long pasture field to its east – will all be preserved, whilst key views of its principal southwest and northeast facing elevations are now framed, as intended, by planting established over 10 years ago during partial implementation of the approved 2014 business park development. The Proposed Development will therefore only affect the listed building's wider setting, which is already well screened by the landscape planting implemented for the aforementioned 2014 development. Mitigation measures include additional landscape planting to screen the low-rise retail development to the northwest of the farmhouse and the selection of suitable material and colour palettes for the most proximate elements of the Proposed Development with which there will be intervisibility (mostly housing to the north and south) - albeit that intervisibility will generally be filtered through the existing landscape planting to varying extents seasonally. After mitigation, there is considered to be a residual **slight adverse** significance of effect to the heritage significance of the listed building. Effects when considered alongside the identified cumulative developments within the environs of the Application Site would remain at the **slight adverse** level.

14.83 Potential **slight/moderate adverse** effects to the significance of buried archaeological remains have been identified, with a focus of activity of medieval to post-medieval date identified by previous archaeological investigations in the northeast of the Application Site. Structures and a driveway, with associated finds of 12th-14th-century and later pottery, have been identified in this area through historic map repression, geophysical survey and archaeological trial-trench evaluation. These remains are likely to be severely damaged or removed by construction groundworks and associated planting and landscaping. A programme of archaeological mitigation is proposed which would offset the loss of such



remains by recording them and making the archive and knowledge thus gained available to the public and archaeological community, in line with the requirements of National Planning Policy. After implementation of the programme of archaeological mitigation the significance of effects upon archaeological remains would reduce to **neutral**. There are considered to be no potential cumulative effects upon buried archaeological remains.

Table 14.6: Archaeology and Cultural Heritage Summary Table

Potential Effect	Nature of Effect (Permanent or Temporary)	Significance	Mitigation/ Enhancement Measures	Residual Effects
Noise, vibration, dust, changes to lighting and visual changes within the setting of Grade II-listed Hawkeridge Farmhouse during construction	Temporary	Slight Adverse	Additional landscape planting and adoption of suitable material and colour palettes for proximate development	Slight Adverse
Loss of/damage to buried archaeological remains	Permanent	Slight/Moderate Adverse	Implementation of an agreed programme of archaeological mitigation	Neutral
Changes to noise, light and traffic levels and visual effects leading to increased sense of urbanisation in wider setting of Grade II-listed Hawkeridge Farmhouse during operational phase	Permanent	Slight Adverse	Additional landscape planting and adoption of suitable material and colour palettes for proximate development	Slight Adverse

REFERENCES

Ref. 14.1: APS (Archaeology & Planning Services) (2013); 'Mill Lane, Hawkeridge, Wiltshire: Archaeological Summary', Report ref. APS 13/385

Ref. 14.2: APS (2014); 'Hawkeridge Business Park, Westbury, Wiltshire: Written Scheme of Investigation for Archaeological Mitigation'.

Ref. 14.3: Archaeological Surveys (2011); 'Hawkeridge Farm, Westbury, Wiltshire: Magnetometer Survey', Report. Report ref. 348.



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- Ref. 14.4:** BGS (British Geological Survey) (2026); Geology of Britain Viewer <http://mapapps.bgs.ac.uk/geologyofbritain/home.html> Accessed 10.03.26
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