



**Hawke Ridge Business Park
Westbury
BA13 4LD**

Heritage and Archaeology Statement

for
Hawke Ridge Business Park Ltd
and Bellway c/o HPH Ltd

BBHC Project: 2025
BBHC Report No. 18152
June 2026



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CONTENTS

EXECUTIVE SUMMARY	7
PART 1: BASELINE ASSESSMENT	11
1. INTRODUCTION.....	11
2. DESCRIPTION OF DEVELOPMENT PROPOSALS	14
3. METHODOLOGY	16
4. BASELINE INFORMATION (FIGURES 2-19; APPENDIX 1).....	17
<i>Statutory Designations (Fig. 14.2)</i>	<i>17</i>
<i>Local Heritage Designations (Figs 14.3-14.6).....</i>	<i>18</i>
<i>Landscape context</i>	<i>18</i>
<i>Previous archaeological investigations (Fig. 14.7).....</i>	<i>19</i>
<i>Archaeological and historical development of the site (Figs 14.2-14.16).....</i>	<i>21</i>
5. HISTORIC LANDSCAPE CHARACTER (FIGS 14.8, 14.17 & 14.18)	33
6. IDENTIFICATION OF HERITAGE ASSETS BEING POTENTIAL RECEPTORS OF IMPACT FROM THE DEVELOPMENT PROPOSALS	35
7. ASSESSMENT OF SIGNIFICANCE.....	42
PART 2: HERITAGE (INCLUDING ARCHAEOLOGICAL) IMPACT ASSESSMENT	60
8. ASSESSMENT OF POTENTIAL DEVELOPMENT EFFECTS.....	60
9. ACKNOWLEDGEMENTS.....	74
10. REFERENCES.....	75
APPENDIX 1: GAZETTEER OF SITES REFERENCED IN THE TEXT AND FIGURES..	77
APPENDIX 2: RELEVANT STATUTE, POLICY AND GUIDANCE	81
APPENDIX 3: AERIAL PHOTOGRAPHS CONSULTED AT HISTORIC ENGLAND ARCHIVE	

List of illustrations

Figures

- Fig. 14.1 Site Location (1:25000 @ A4)
- Fig. 14.2 Designated Heritage Assets
- Fig. 14.3 Prehistoric and Roman Historic Environment Records
- Fig. 14.4 Saxon and medieval Historic Environment Records
- Fig. 14.5 Post-medieval and modern Historic Environment Records
- Fig. 14.6 Undated Historic Environment Record
- Fig. 14.7 Historic Environment Events
- Fig. 14.8 Historic Landscape Character
- Fig. 14.9 Portable Antiquities Scheme Records
- Fig. 14.10a Extract from 1808 Westbury Inclosure Map (Wilts Archives EA76)
- Fig. 14.10b Extract from 1842 Westbury Tithe Map
- Fig. 14.11 Extract from 1887 Ordnance Survey 25-inch Map
- Fig. 14.12 Extract from 1901 Ordnance Survey 25-inch Map
- Fig. 14.13 Extract from 1924 Ordnance Survey 25-inch Map
- Fig. 14.14 Extract from 1941 Ordnance Survey 25-inch Map
- Fig. 14.15 Extract from 1961 6-inch Map
- Fig. 14.16 Extract from 1970-71 1:2500 National Grid Map
- Fig. 14.17 Land associated with Hawkeridge Farm at 1842 tithe apportionment
- Fig. 14.18 Historic landscape features Hawkeridge Farm
- Fig. 14.19 Hawkeridge Farm views analysis
- Fig. 14.20 Proposed revised archaeological mitigation area

Plates (to be found throughout the body of the report)

- Plate 1 Architect's masterplan for proposed residential development
- Plate 2 Proposed area of archaeological mitigation (extract from APS 2014, Fig. 14.1)
- Plate 3 Extract from Figure 1 of Wessex Archaeology (2011) report showing location of archaeological trenches and features over geophysical survey anomalies © Wessex Archaeology
- Plate 4 Extent of area called 'The Ham Field' and tithe parcels including the name 'Ham' (extent shown by black dashed lines) plotted in relation to prehistoric and Roman features and findspots recorded by HER and PAS
- Plate 5 LIDAR Hillshade Analysis using DEFRA 2022 Composite Digital Terrain Model 1m data with Azimuth of 315, z10, Alt35
- Plate 6 Oblique view [8] from Mill Lane entrance
- Plate 7 Oblique view [9] from Mill Lane gateway to rear of farmhouse

- Plate 8 The best view [3] of the farmhouse from the field to the east which lies outside the Application Site, viewed from the public right of way
- Plate 9 Oblique view from the Application Site southeast of the farmhouse, the chimneys of which can be seen between the taller trees, just right of the centre of the image
- Plate 10 View from the south, looking along the wet ditch towards the farmhouse behind the tree line
- Plate 11 View from the disused railway embankment to the southeast of the farmhouse (seen near the right hand side of the image), the business park buildings prominent to the left of the farmhouse
- Plate 12 View [13] of the Westbury White Horse from the new road entrance into the southern part of the Application Site
- Plate 13 Glimpsed view [7] from the southwest, looking through the business park entrance to the farmhouse beyond
- Plate 14 View from the northern part of the Application Site with White Horse on the left and farmhouse positioned behind trees towards the centre of the image
- Plate 15 View from the northwest corner of the Application Site, looking towards the farmhouse (centre right, behind the tree line) with the White Horse rising above and to the left of it
- Plate 16 Drone view of the farmhouse from the west, with Hawkrigge Mill top left
- Plate 17 Drone view of the farmhouse from the north, showing the limited fenestration in the north-facing elevations and the extent of recently thickened planting along Mill Lane to the north of the house
- Plate 18 Drone view of the farmhouse from the east, West Wiltshire Trading Estate seen beyond the new roundabout
- Plate 19 Drone view of the farmhouse from the south, showing limited window openings in the south gable, northern part of Application Site and Hawkeridge village beyond
- Plate 20 Drone view of the farmhouse from the southeast
- Plate 21 Illustration of the concept of harm being a sliding scale with a threshold at high level along the scale between the NPPF categories of less than substantial harm and substantial harm
- Plate 22 Parameter Plan (Rev. C) approved in respect of the 2014 business park application

ABBREVIATIONS USED IN THE TEXT

AOD	Above Ordnance Datum
WA	Wiltshire Archives (Wilts & Swindon Heritage Centre)
BGS	British Geological Survey

KYP	Know Your Place website
CifA	Chartered Institute for Archaeologists
HE	Historic England
HEA	Historic England Archive
HER	Historic Environment Record
NHLE	The National Heritage List for England
NLS	National Library of Scotland
NMR	National Monuments Record
n.i.	Not Illustrated
n.d.	No date

EXECUTIVE SUMMARY

In December 2025 Bristol & Bath Heritage Consultancy Ltd was commissioned to prepare an independent Heritage and Archaeology Statement for the Proposed Development of a mixed-use scheme comprising residential, commercial and nursing home uses, with associated access roads and landscaping, on land at Hawke Ridge Business Park, Westbury, Wiltshire. The Heritage and Archaeology Statement, including a preliminary impact assessment, was initially drafted between December 2025 and March 2026, at which time it was circulated in order to inform the development proposals. The impact assessment was updated and finalised in respect of the final scheme design in June 2026, and the Heritage and Archaeology Statement re-formatted slightly to form Technical Appendix 14.1 to Chapter 14 (Archaeology and Cultural Heritage) of the Environmental Statement which was deemed to be required for the Proposed Development by Wiltshire Council, with the accompanying figures now forming a separate Technical Appendix 14.2.

Archaeology

The baseline assessment has found that the Application Site was subject to limited archaeological evaluation in 2003-4, during works associated with the then proposed Westbury Eastern Bypass, with more extensive site-specific evaluation of the current Application Site carried out in 2011 in preparation for an application for construction of a new business park (subsequently submitted and approved in 2014). Those evaluations identified an area of archaeological potential in the northeast of the Application Site, comprising post-medieval occupation areas and structures with potentially medieval origins. An area for archaeological mitigation by means of an archaeological watching brief during soil stripping in was subsequently defined as a requirement of a planning condition attached to the 2014 business park approval. Residual artefacts of late prehistoric and Roman date were also found during the 2003-4/2011 evaluations, suggesting a background of activity near the Application Site in those periods. However, no archaeological features of certain prehistoric or Roman date were identified within the extent of the Application Site. Since the 2011 evaluations, further archaeological investigations have found prehistoric and Roman settlement activity to the south and southwest of the Application Site, at their nearest extending to within c. 80m from the site boundary. This assessment has examined the question of why those settlement areas were not found to extend into the Application Site despite this proximity and the earlier finds of residual artefacts of the periods. It concluded that almost all of the late prehistoric and Roman settlement activity identified by the Historic Environment Record within the site environs lies within an area of land largely defined by the courses of two brooks (Biss

Brook and Bitham Brook) and historically known as 'The Ham Field(s)', which name typically indicates an enclosure or settlement by a river. The historic northern boundary of 'The Ham Field(s)' lies c. 80m to the south and southwest of the Application Site, indicating that the Application Site probably lay just beyond the area in which late prehistoric and Roman settlement activity was principally focussed. The results of the previous evaluations of the Application Site in 2003-4 and 2011 are therefore considered to remain reliable, although a slight adjustment to the previously approved archaeological mitigation area is put forward to ensure small buildings or structures identified on the 1808 Westbury Inclosure map are included within its extent. A Written Scheme of Investigation, setting out the methodology for the proposed programme of archaeological mitigation, has been prepared as Technical Appendix 14.3 of the Environmental Statement.

Built Heritage

The built heritage assessment found that there are no designated or non-designated built heritage assets within the Application Site that could be directly affected by the development proposals. The only potential effects were therefore considered to be indirect effects resulting from changes to the settings of heritage assets which lay beyond the Application Site. The heritage assets contained within (and a few on the fringes of) the 1km Study Area set for this assessment were considered at Step 1 of the five-step approach advocated in the Historic England guidance on settings assessment (Good Practice Advice Note 3: Historic England 2017). However, in the event only Hawkeridge Farmhouse was scoped-in for further assessment. The Application Site lies within part of the historic landscape setting of this 17th-century, Grade II-listed farmhouse. The southern part of the Application Site and most of the southern field of the northern part fall within the extent of land farmed from Hawkeridge Farm at the time of the 1842 Tithe apportionment. Therefore, the significance and potential for the development to result in effects upon the setting of Hawkeridge Farmhouse was further assessed in accordance with the Historic England guidance.

Documentary research, map regression, examination of aerial and satellite imagery, historic landscape characterisation and settings assessment combined to demonstrate that the Application Site forms a relatively small portion of the once much larger (c.50ha) land holding farmed from Hawkeridge Farm in 1842, most of which was pasture, with the farm mostly given over to dairying. The farm has gradually been separated, physically and visually, from a large part of that land through the establishment of railway lines and embankments to the south in the 19th and 20th centuries, whilst the farmhouse itself appears to have become a domestic residence by 1991. All but two of the Application Site's internal field boundaries associated with the farm have been lost as a result of mechanisation and efficiencies in farming practice

throughout the 20th century, with smaller enclosures, allotments on Hawkeridge Road, a former driveway leading to Hawkeridge village and small buildings or structures along the driveway all now removed. The development, in the 20th century, of the West Wiltshire Trading Estate to the west/southwest and of the smaller Hawke Ridge Business Park in the former fields and orchards to the immediate southwest of the farmhouse, along with the formation of a new roundabout and entrance roads at the junction of Hawkeridge Road and Mill Lane in the 21st century, have considerably urbanised that part of the farmhouse's setting. Advanced planting and landscaping along Mill Lane and at the site boundaries, required as part of the landscape strategy agreed as a condition of outline planning permission for a larger Hawke Ridge Business Park granted in 2014, was found to have been implemented and matured considerably during site inspection by the author in early March 2026. The planting has greatly increased the sense of enclosure of the farmhouse, particularly to the immediate northwest and southeast of the farmhouse, creating further physical and visual separation between the farmhouse and its historic landscape setting since the previous business park permission was considered in 2014. However, some glimpsed, vegetation-filtered and/or oblique views in and out of the farmhouse were still attainable from its wider setting.

Impact assessment, undertaken as part of this Statement, has identified that 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, leading to an increased sense of urbanisation and - whilst there is some inherent and proposed mitigation in the form of landscape planting/screening - there is considered to be a residual level of harm to the setting of the farmhouse which, on balance and exercising professional judgement, is considered to lie at the lower end of the scale of less than substantial harm. Proposed building height and massing is less than that approved within the parameters of the 2014 outline planning permission, ecological buffers are maintained or increased and additional landscape planting provides further mitigation. The potential residual effects of the current proposals are considered to be less harmful than those for 2014 outline application and subsequent Reserved Matters applications 16/06752/REM and 17/01201/REM.

Whilst consideration could be given to further planting in hedge/tree gaps to further mitigate these effects, further enclosure of the farmhouse with planting could lead to overshadowing and, on balance, it is felt the existing planting is sufficient to preserve its setting. 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 buildings of the West Wiltshire Trading Estate already feature prominently. 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 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. The current proposals show these properties within the 'rural edge' character area, in which a suitable range of materials and colour choices appears to be available.

The removal of the two surviving internal historic field boundaries within the Application Site, which this assessment has demonstrated have lost almost all of their historic landscape character, integrity and authenticity, was previously approved in respect of the 2014 planning consent for a large business park on the site. The southern field boundary, now a wet ditch, has lost its hedgerow entirely, whilst the northern hedgerow boundary was demonstrably cut down in the mid-2010s and has regrown, or been replanted, since 2021. The remaining heritage interest of these boundaries is therefore minimal and, as a result, their loss is not considered to have a significant impact upon the historic environment.

Cumulative Effects

The potential cumulative effects upon archaeology and built heritage of the Proposed Development, together with four other consented or pending development proposals, has also been assessed. The conclusion is that there would be a slightly elevated adverse cumulative effect upon the significance of Hawkeridge Farmhouse. However, it is considered that the adverse effect remains at the lower end of less than substantial harm due to the preservation of the farmhouse's immediate setting and all of its inherent archaeological, architectural and historic values from which the vast majority of its significance is now derived, along with visual separation from all of the cumulative development schemes. There would be no cumulative effects upon the archaeological resource.

PART 1: BASELINE ASSESSMENT

1. INTRODUCTION

- 1.1 In December 2025 Bristol & Bath Heritage Consultancy Ltd was commissioned by Hawke Ridge Business Park Ltd and Bellway c/o HPH Ltd to undertake a Heritage and Archaeology Statement for land known as Hawke Ridge Business Park, Westbury, Wiltshire BA13 4LD (centred at NGR 386393,153222; Fig. 14.1). The Statement is to accompany a full planning application, for a proposed mixed use development, comprising residential, commercial and nursing home developments with associated access roads and landscaping. This Statement forms Technical Appendix 14.1 of the Environmental Statement, with the accompanying figures presented at Technical Appendix 14.2.

Report Structure

- 1.2 Part 1 (Sections 1-7) contains a baseline assessment of the historic environment (including archaeology) within and in the environs of the Application Site. Section 2 sets out a description of the development proposals. Section 3 sets out the data gathering methodology, and Section 4 the Historical and Archaeological background. Section 5 describes the Historic Landscape Character and Section 6 identifies the heritage (including archaeological) assets which are considered to be potential receptors of either direct or indirect effects from implantation of the Proposed Development. Section 7 assesses the significance of those assets, including any contribution made to that significance by the asset's setting. Part 2 (Sections 8-10) contains an assessment of the potential effects of the Proposed Development, when implemented, upon the heritage significance of the identified heritage receptors, including an assessment of the potential effects upon buried archaeological remains, along with acknowledgements, references, technical appendices and figures. The report text is supported by illustrations, with larger scale 'figures' such as maps and plans presented as a separate volume forming Environmental Statement Technical Appendix 14.2. Photographs and other smaller-scale images are generally included as 'plates' within the appropriate section of the report text for ease of reference.

The site

- 1.3 The Application Site encompasses an area of 14.58 hectares in two main development areas (north and south) separated by Mill Lane and a narrow strip of land associated with the Grade II listed Hawkeridge Farm. An existing roundabout and

roads off Hawkeridge Road provide access to Mill Lane and these form the link between the two development areas. The site currently comprises mostly arable land. The area on the north side of Mill Lane is divided into two areas by a historic, hedged, field boundary which runs roughly east/west across the southern part of the area. The area south of Mill Lane is divided in two by a slightly curving historic field boundary towards the centre of the area which survives as a wet ditch, with no hedging or trees evident. The site is situated to the east of the B3097 Hawkeridge Road, which connects the northern edge of Westbury with Yarnbrook to the north, and is accessed by a roundabout on that road and the beginnings of associated estate roads constructed to provide access to Hawke Ridge Business Park, which received outline planning consent in 2014. The site is bounded to the south by the course of a now-dismantled railway line, to the east by an active railway line, Hawkeridge Mill, kennels, and by open fields to the north of the kennels. To the north, it is bounded by open fields to the south of the village of Hawkeridge.

Purpose and limitations of this report

- 1.4 This independent heritage and archaeology statement provides an assessment of the significance of archaeological, built and/or cultural heritage assets in the environs of the Application Site, and of the impact of the submitted development proposal on that significance. The National Planning Policy Framework [NPPF], which since 2012 has incorporated the Government's heritage policy and is now in an eighth edition (published December 2024, with minor amendments on 7 February 2025), recognises that the historic environment is an irreplaceable resource whose fragile and finite nature is a particularly important consideration in planning. The Historic Environment Good Practice Advice in Planning: 2 (entitled 'Managing Significance in Decision-Taking in the Historic Environment' and published in July 2015; HE 2015), states:

'Development proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect. The first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance.' [HEGPA 2, paragraph 4]

- 1.5 It also notes in its introduction that:

'...the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or investigate the asset needs to be proportionate to the significance of the heritage assets affected and the impact on that significance' [HEGPA 2, paragraph 3]

1.6 The Good Practice Advice advocates a logical step-by-step approach to dealing with heritage assets during the planning and design of development and subsequently in making a planning application – namely:

- *'Understand the significance of the affected assets*
- *Understand the impact of the proposal on that significance*
- *Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF*
- *Look for opportunities to better reveal or enhance significance*
- *Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change.*
- *Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.'* HEGPA 2, paragraph 6]

1.7 This heritage statement has been prepared to fulfil this brief established by the NPPF and the Historic Environment Good Practice Advice in Planning: 2. It has also been prepared to accord with guidance set out in Historic England's 2019 Advice Note 12 *'Statements of Heritage Significance: Analysing Significance in Heritage Assets'* (HE 2019).

1.8 This statement has been prepared with the use of information readily available at the time it was being researched and produced (the baseline research and draft report was undertaken between December 2025 and March 2026. The sources and methodology utilised in the research are set out at Section 3 below. Changes to circumstances following the compilation of this Heritage and Archaeology Statement, including changes to the Proposed Development area, nature of the development proposals or the availability of new information, guidance or legislation, may lead to a requirement for re-evaluation of the Statement's content and/or conclusions. Examples of this include the subsequent addition of new areas to the development site which were not required to be considered within this iteration of the report,

updates to heritage-related planning legislation, policy or guidance, updates to historic environment standards and guidance, or the availability of new information on the historic environment, such as the release of updated lists of nationally and locally-designated heritage assets, or the release of previously unavailable reports or research.

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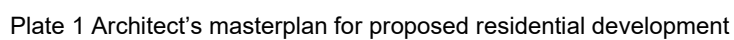
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2. DESCRIPTION OF DEVELOPMENT PROPOSALS

- 2.1 The planning application is for a proposed mixed-use development comprising residential, commercial and nursing home uses, with associated access roads and landscaping. Access will be via the existing roundabout from the Hawkeridge Road. The full planning application description reads:

Erection of: (i) 1 No. retail convenience store (Class E), 3 No. flexible retail units (Class E), and roadside drive through unit (sui generis); (ii) a 64-bed care home (Class C2); and (iii) 249 No. residential dwellings (Class C3) with associated access, green and blue infrastructure works.



3. METHODOLOGY

3.1 The Heritage and Archaeology Statement identifies, and provides an assessment of the significance of, heritage assets, including archaeological assets, within the Application Site and its environs, and identifies potential impacts upon them, including potential effects from the Proposed Development upon the value contributed to their significance by their settings. This has been achieved by collating all readily available evidence from the sources described below at para. 3.3. The criteria for assessing the significance of heritage assets, and the level of effect (impact) the development may have upon them and their settings, is described at Sections 7 and 8 respectively and supported by the more detailed Heritage Statute, Policy and Guidance information contained within Appendix 2. The Heritage and Archaeology Statement has been prepared in accordance with *Statements of Heritage Significance: Analysing Significance in Heritage Assets* (HE 2019); *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* (HE 2015) and *Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (HE 2017).

3.2 Key legislation, national and local policy and guidance applying to, and referenced where appropriate throughout, this study is detailed in Appendix 2, and includes:

- Ancient Monuments and Areas Act 1979
- Planning (Listed Buildings and Conservation Areas) Act 1990
- National Heritage Act 1983 (Amended 2002)
- Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment (EH 2008)
- National Planning Policy Framework (NPPF December 2024, with minor amendments 7 February 2025)
- Good Practice Advice in Planning Note 2: Decision-Taking in the Historic Environment (Historic England 2015)
- Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Historic England 2017)
- Wiltshire Local Plan Core Strategy 2015
- Draft Heywood & Hawkeridge Neighbourhood Plan (2020 to 2036)

3.3 A study area for this assessment has been set with a buffer of 1km from the site centre, which is considered sufficient for the purposes of a proportionate assessment of cultural heritage potential and significance. Data on built heritage and archaeological assets within the study area was obtained in December 2025 from the Wiltshire Historic Environment Record and the National Heritage List for England, and relevant built heritage assets and archaeological monuments and investigations are referenced as appropriate in Section 4 to provide a suitable understanding of the site's built heritage and archaeological context and potential. Sources consulted during the study included:

- Wiltshire Historic Environment Record (HER) (a commercial search with a 1km buffer from the site centre)
- 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.

4. BASELINE INFORMATION (FIGURES 2-19; APPENDIX 1)

Statutory Designations (Fig. 14.2)

4.1 There are no designated heritage assets within and/or including the Application Site itself, although the Grade II-listed Hawkeridge Farm (NHLE 1021504) lies centrally directly between the two separate parcels of land which together form the Application Site. A scheduled monument, a moated site (NHLE 1013102), lies within the West Wiltshire Trading Estate some 690m to the west of the Application Site. The Grade II listed 5, Hawkeridge, the next nearest listed building, lies 175m to the north of the site's northern extent, whilst the Grade II-listed Court Farmhouse (NHLE 1181492) is 365m to the northwest. The remaining group of Grade II listed buildings within the 1km study area are all within Heywood, situated over 575m to the east of the Application Site. This group includes the Church of Holy Trinity (NHLE 1364266),

Blenches Mill at Blenches Mill Farm (NHLE 1387285), West Lodge (NHLE 1364268) and Gate Piers to Heywood House (NHLE 1284973).

Local Heritage Designations (Figs 14.3-14.6)

- 4.2 There is a total of 63 locally-designated heritage assets/monuments recorded by the Historic Environment Record within the 1km study area. Of these there are only two archaeological findspots recorded within the Application Site, in approximately the same location southwest of Hawkeridge Farm: Romano-British Pottery (MWI1510; Fig. 14.3) and a post-medieval pit (MWI1564; Fig. 14.5). In addition, the HER records a number of undated earthworks identified through aerial photography, geophysical survey and archaeological evaluation, including undated pits west of Hawkeridge Mill (MWI74596), an undated field system (MWI1608), undated field boundaries (MWI74595) and undated enclosures (MWI74594). Further detail of these assets is provided, where relevant to the current Application Site, is provided in the appropriate period sections below.

Landscape context

- 4.3 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 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).

- 4.4 Soil cover is mostly mapped as slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils typically associated with landcover of grassland and arable, with some woodland (Soilscapes 2026). The natural brown to green-brown clayey alluvial deposits and/or orange, yellow-brown or bluey-grey Oxford Clays were encountered in the base of all the excavated archaeological evaluation trenches at depths ranging from 0.23-0.46m below existing ground level (begl), but typically at c. 0.36m depth. The alluvial deposits were primarily encountered within the lower-lying areas of the Application Site, as might be expected. Subsoil was only encountered in seven trenches, and it was suggested the effects of ploughing may have removed shallow subsoils across much of the site or mixed these with the topsoil (WA 2011, 4).

Previous archaeological investigations (Fig. 14.7)

- 4.5 The Application Site has been subject to site-specific archaeology and cultural heritage assessment (Entran 2008), geophysical (Magnetometer) survey (EWI6832: Archaeological Surveys 2011) and archaeological evaluation by trial trenching (EWI7293; WA 2011), all undertaken in relation to the business park application and summarised in a report prepared for that application by Archaeological Planning Solutions (APS 2013). The APS report also summarises the potential impacts of the business park development upon the archaeological resource.
- 4.6 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 two areas (Entran 2008).
- 4.7 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 droveway, 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 site were thought likely to relate to former agricultural activity and infilled boundary ditches (Archaeological Surveys 2011).

4.8 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.

4.9 In respect of the 2014 business park planning application, following the conclusion of the above works, it was determined by Wiltshire Council that archaeology was not a constraint to development, but that an archaeological watching brief would be required over a defined area in the northern land parcel as a condition (Condition 10) of planning consent (application no. 14/03118/OUT). The condition states:

No development shall commence on site until a written programme of archaeological investigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved by the Local Planning Authority. The proposal shall then be carried out in accordance with the approved details.

4.10 A *Written Scheme of Investigation [WSI] for Archaeological Mitigation* was subsequently prepared by APS (2014) to address this condition, setting out the scope of the archaeological watching brief on topsoil and subsoil removal and defining the area for archaeological watching brief at Figure 1 of the WSI (an extract of this is reproduced below, the area for archaeological watching brief highlighted in green).



Plate 2 Proposed area of archaeological mitigation (extract from APS 2014, Fig. 14.1)

- 4.11 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 & Appendix 1). These are discussed, where relevant, in the appropriate period sections below.

Archaeological and historical development of the site (Figs 14.2-14.16)

Prehistoric (Figs 14.3, 14.7 & 14.9)

- 4.12 During the 2011 archaeological evaluation eleven sherds of residual later prehistoric pottery were identified in Trench 2, possibly all from a single vessel of probable early/middle Iron Age date, although no prehistoric features were identified within the Application Site by this or any other archaeological investigations (WA 2011, 10).

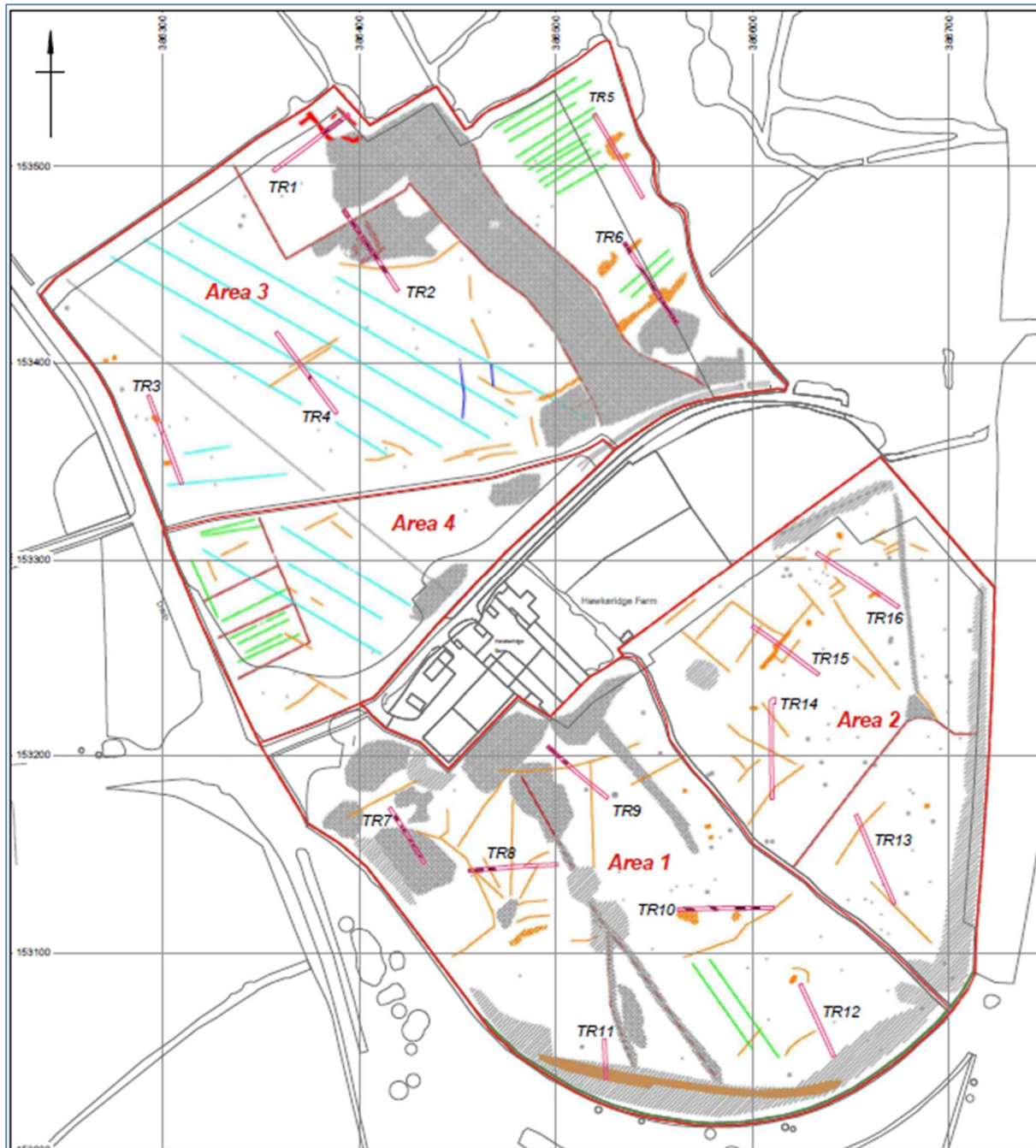


Plate 3 Extract from Figure 1 of Wessex Archaeology (2011) report showing location of archaeological trenches and features over geophysical survey anomalies © Wessex Archaeology

- 4.13 Beyond the Application Site, a Neolithic Greenstone axe, bone gouge and fossil belemnite bead (MWI1448) and Bronze Age pottery (MWI1462) have been found at The Ham, c. 660m southwest of the Application Site.
- 4.14 Archaeological evaluation of a site at West Wiltshire Trading Estate in 2019 (EWI9579), some 25m west of the Application Site, and subsequent strip, map and

sample excavation (EWI9946) in 2021 identified a later prehistoric ditch (MWI78098) and a series of medieval ditches.

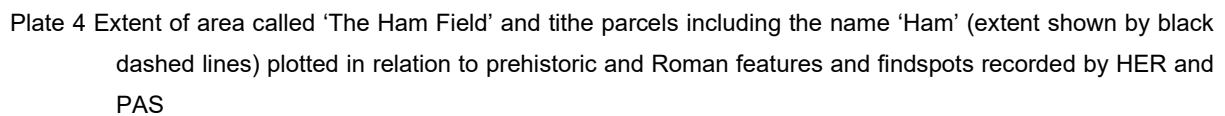
- 4.15 Middle to Late Bronze Age pits and ditches (MWI1468) were found in 2003 during evaluation for the proposed Westbury Eastern Bypass (EWI6547) and during a subsequent 2013 evaluation (EWI7346) at Blenches Mill Farm, some 280m southeast of the Application Site.
- 4.16 A small amount of prehistoric and medieval pottery was recorded during evaluation at Glenmore Farm (EWI8002) to the southwest of the Application Site in 2015 which revealed a concentration of ditches and gullies in the northeastern part of the site (MWI1585) interpreted as Roman field boundaries, drainage ditches and a possible trackway.
- 4.17 Residual prehistoric artefacts were recorded 272m west of the Application Site in a 2016 evaluation (EWI9244) in association with probably post-medieval or modern drainage and boundary ditches. The Portable Antiquities Scheme records an Iron Age coin findspot to the southeast of the Application Site (Fig. 14.9). It is noted that almost all of the prehistoric features and findspots within the 1km study area occur in an area called 'The Ham Field' on the 1842 Tithe Map (see 4.20 & Plate 4 below; the exception being the residual pottery from Trench 2 of the 2011 site evaluation).

Roman (Figs 14.3, 14.7 & 14.9)

- 4.18 A single sherd of residual coarse greyware pottery was recovered from Trench 5 in the northeast of the northern land parcel during the 2011 evaluation of the Application Site (WA 2011, 10), with a further two sherds recorded in the northwest of the southern land parcel from Trench 111 of the 2004 evaluation for the proposed Westbury Eastern Bypass (MWI1510). No Roman features have been identified within the Application Site through these previous investigations.
- 4.19 Roman settlement was identified during the digging of iron ore at Westbury Ironworks in the late 19th-century c. 510m south of the Application Site (MWI1481, with further Roman pottery found to the north of that at MWI1501). Settlement has also been recorded at Glenmore Farm, where archaeological evaluation in 2015 (EWI8002) revealed a concentration of ditches and gullies in the northeastern part of the site (MWI1585), the nearest c.78m to the west of the Application Site, interpreted as Roman field boundaries, drainage ditches and a possible trackway. Less

concentrated Roman activity was recorded to the south and west. Roman settlement activity (MWI78329) was recorded between Westbury Ironworks and Glenmore Farm during evaluation of land off Storridge Road in 2022 (EWI10172). Trenches 89-91 and 93-98 of the 2004 Westbury Proposed Eastern By-pass evaluation revealed evidence for Roman settlement, possibly a settlement enclosure, a possible roundhouse and associated field systems, c. 80m to the south of the Application Site (MWI1503). An infant inhumation was revealed in Trench 97 (MWI1508) and an undated but probably Roman crouched burial in Trench 98 (MWI1509), with another inhumation placed in a ditch. Trench 88 produced a single-sherd of Roman pottery (MWI1507). The Portable Antiquities Scheme records a Roman brooch and three coin findspots to the southwest and southeast of the Application Site, close to the By-pass site (MWI1503) and within Glenmore Farm site (MWI1585).

- 4.20 Most of the areas of Roman (and almost all of the prehistoric) activity recorded to the south and southwest of the Application Site 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. HER site MWI1585, to the southwest of the Application Site, is within 'Lower Ham or Priors Ground' and much of MWI1503 to the south is within 'Ham Tynning' or 'Ham Field', with a close correlation between the tithe boundary and the northern extent of recorded Roman settlement activity. The settlement at the Ironworks site (HER site MWI1481) is within 'Yonder Ham'. Both the tithe map (Fig. 14.10b) – and the 1808 Inclosure map before it (Fig. 14.10a) – indicate 'The Ham Field' as an extensive area between the two aforementioned brooks running from The Ham in the southwest to Heywood in the northeast. Most of the prehistoric and Roman features and findspots identified by the HER lie within the area thus defined (see Plate 4 below). The Application Site would appear to lie beyond the boundary of this well-defined area by a distance of some 80m, with no 'Ham' field names occurring within the Application Site itself. This 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 the 2003/4 and 2011 field evaluations despite the apparent proximity of settlement activity of those periods.



4.21 Archaeological evaluation of the Application Site in 2011 (EWI7293) identified medieval pottery of primarily 12th-14th-century date, usually 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 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. 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 (WA 2011).

- 25

mount findspot to the south of the Application Site, along with medieval findspots to the southwest, southeast and east (Fig. 14.9).

- 4.23 Archaeological evaluation at West Wiltshire Trading Estate in 2019 (EWI9579) and subsequent strip, map and sample excavation (EWI9946) in 2021 identified a network of ditches c. 85m west of the southern land parcel associated with medieval pottery and animal bone (MWI78059).
- 4.24 Other medieval features recorded by the HER include settlement at Hawkrige (MWI1526) and Heywood (MWI1525) a deer park to the west of the study area, East of Broke House Farm (MWI1538), the scheduled medieval moated enclosure at West Wiltshire Trading Estate (MWI1517), medieval pottery found at The Ham (MWI1530), ridge and furrow (MWI1548).
- 4.25 The village of Hawkeridge was first recorded in 1368, when it was described as a hamlet during partitioning of the lands of Sir John Pavely (Crittall, Rogers & Spalding 1965, 149). By 1599 it had merged with the manor of Westbury, a royal estate at Domesday. The placename is likely to derive from the Old English *hafoc* + *hrycg*, meaning 'ridge frequented by Hawks' (Mills 1991, 171).

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

- 4.26 The 2004 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).
- 4.27 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 (W/83/01144/FUL) and it was subsequently converted from mill usage to residential accommodation in 1988 (W/87/01656/FUL),

including creation of two flats and a semi-detached building (W/88/00990/FUL). Since then conservatories and extensions have been added (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 (17/11715/FUL). Ownership of the buildings has potentially been further sub-divided since then (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 site by 1848 and is first shown on the 1887 Ordnance Survey (Fig. 14.11). A railway junction (MWI77590) was established to the south of the 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.

- 4.28 Grade II-listed Court Farm, Hawkeridge (MWI70264), 340m northwest 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 (Figs 14.2, 14.5 & Appendix 1).

- 4.29 The Portable Antiquities Scheme records post-medieval and modern findspots to the E, southeast and southwest of the Application Site (Fig. 14.9).

Undated (Figs 14.6 & 14.7)

- 4.30 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 the 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 in Trenches 1 and 2 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 in Trench 2 (WA 2011, 7). In Trench 6, 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 site represent the ditched boundaries of a former driveway recorded on the Tithe Map and accompanying apportionment (Fig. 14.10b & see below).

- 4.31 Further undated pits, ditches, postholes, field boundaries and a ring-ditch are recorded by the HER in the wider site environs, to the southeast, southwest and west of the Application Site (Fig. 14.6 & Appendix 1).

Historic Map Regression (Figs 14.10a-14.18)

- 4.32 The 1808 Westbury Inclosure map is the earliest detailed map of the site (Fig. 14.10a). It shows Hawkeridge Farm as an L-shaped, slightly stepped building (possibly originally two detached buildings at right angles to each other with a linking corridor added at the southwest) with another large building to its southwest. None of the other extant curtilage buildings within the farmstead are shown. Two extant internal field boundaries, represented now by an east/west hedgerow in the northern land parcel and the wet ditch cutting across the centre of the southern land parcel, are shown on the map. Other field boundaries match up to some extent with those shown on the 1842 Tithe Map (Fig. 14.10b), but some had been removed in between (e.g. the irregular shaped parcel 506, of which the proprietor was a Joseph Ford and which was named 'Peaches', whilst tithe parcel 1844 was two or even three fields with a substantial L-shaped building – outside of the Application Site boundary – shown to the south of Mill Lane at its junction with the southern end of North House Drove – see Fig. 14.18, building 'e' for location). Of the numbered land parcels within the Application Site 498 was called 'North House Drove', proprietor Sarah Eden, 499 and 500 were part of Hawkeridge Common, proprietors Joseph Ford and Richard Bourne respectively. Parcels 501-505 appear to be allotments on Hawkeridge Common in a variety of separate ownerships, with 504 and 507 held by Joseph Ford. Where the proprietor of land which at the tithe map was part of the same tenure as Hawkeridge

Farm is identified, including some detached parcels of land, the proprietor is given as Joseph Ford, who presumably therefore operated the farm in 1808. The map shows small buildings in the northeast of the Application Site, mostly west of North House Drove or Road (buildings a-c on Fig. 14.18), with one to the east of the driveway (itself, feature I on Fig. 14.18 recorded as '20 feet' wide on the map) in the southeast corner of the northern land parcel in the exact location of a recently built sewage pumping station (this is building d on Fig. 14.18). The other buildings are two just southeast of 2011 evaluation Trench 1 (buildings a & b on Fig. 14.18; WA 2011) and another just east of Trench 2 (building c on Fig. 14.18). Buildings a and c are both within an area of future archaeological mitigation by watching brief agreed as a condition of the Business Park planning consent granted in 2014, but building b is just outside that area. In the Inclosure Award, Joseph Ford is recorded as the Superintendent of 'North House Road' (marked XXXVIII on the map) and William Matravers of Hawkeridge Mill is recorded as the Superintendent of 'Hawkeridge Mill Road' (marked XXXVII on the map). The field called 'Condages' is recorded as 'ancient' in the award (at the Tithe apportionment it is 'Cunridges').

- 4.33 Hawkeridge Farm (parcel 1850) is shown as an L-shaped building on the Know Your Place copy of the 1842 Tithe Map (Fig. 14.10b), but the version held by the National Archives (TNA, hosted on The Genealogist website, not illustrated) appears to be slightly more detailed and shows it as U-shaped, forming a northeast-facing courtyard with its open side facing Mill Lane. It is unclear as to whether the now attached barn to the south of the farmhouse is shown on this map (the long rectangular building), given the changes to the form of the principal building, but none of the other curtilage buildings were shown at this date. At the tithe apportionment, the farm was owned by William Dean and occupied by Mary Pile. Tithe parcel 1853, north of Mill Lane, marks the northward extent of contiguous land occupied by the farm (further outlying parcels of land are recorded east of Hawkeridge and southeast of The Ham). The northern edge of 1853 correlates to the surviving hedged field boundary in the northern land parcel, continuing westwards to form the northern boundary of allotments occupying tithe parcels 1854-1856. The extent of land owned by William Dean and occupied by Mary Pile and, presumably therefore, part of Hawkeridge Farm totalled 50 hectares and this is plotted on Figure 14.17 over a May 2025 Google Earth Satellite image to illustrate the extent and usage of this land today. Most of the land was pasture in the apportionment, with only the two large fields to the southwest at The Ham forming arable land (Fig. 14.17, 1761 & 1763). All of the land within the Application Site was

pasture bar the three allotments at 1854-1856 and Hawkeridge Farm and garden (1850-1851).

4.34 The apportionment identifies a possible former droveway, North House Drove running through parcels 1876, 1857e and 1857f and which appears to continue through parcel 1857g (Cunridges). The Application Site tithe parcels are recorded as:

- 1844 Lower Lydes (pasture);
- 1845 Upper Lydes (pasture);
- 1846 Fords (pasture);
- 1847 Page's Paddock (pasture);
- 1849 Cox's (pasture);
- 1850 Farmhouse, yards & garden;
- 1853 Common Piece (pasture);
- 1854 Allotment (pasture);
- 1855 Allotment (pasture);
- 1856 Allotment (pasture);
- 1857a The Paddock (pasture);
- 1857b Cunridges (pasture);
- 1857c Cunridges (pasture);
- 1857d Cunridges Paddock (pasture);
- 1857e North House Drove (pasture);
- 1857f North House Drove (pasture);
- 1857g Cunridges Paddock (pasture); and
- 1902 Coles (arable).

4.35 The 1887 First Edition Ordnance Survey map (Fig. 14.11) provides the first accurate survey of Hawkeridge Farm, which appears close to its present plan form, along with its curtilage buildings including the by now attached long range to the south of it (possibly shown on the tithe map) and the barn opposite (Hawkeridge Barn, to the southwest). The field boundaries are broadly similar in the northern land parcel but some have been removed in the east of the southern parcel and the Wilts, Somerset & Weymouth railway line and embankment (MWI79700) is shown for the first time. A footpath is shown extending all the way from Hawkeridge in the north along North House Drove and through the southern field to the railway embankment. Further footpaths are shown in the northern parcel. Hawkeridge Mill is shown as a corn mill.

There is little change between this map and the 1901 map, although by the latter Hawkeridge Mill is shown as 'disused' (Fig. 14.12). By 1924 the mill was being used for leather production and the northern wing looks to have been derelict (Fig. 14.13).

- 4.36 By 1941 the mill was being used as an umbrella factory and a new building had been constructed northwest of the mill building (Fig. 14.14). The boundaries of one of the former allotments in the southwest of the northern land parcel shown on the tithe map had been removed. A further barn had been added against the west side of the existing barn at Hawkeridge Farm and the orchard here was no longer shown. By 1961 a field boundary in the southwest of the southern parcel had been removed and the curving branch line to the military depot to the southwest had been constructed but little else had changed. By 1970-71 all of the former allotments in the north land parcel had disappeared and further outbuildings had been added to Hawkeridge Farm, including a large structure west of the original barn southwest of the farmhouse (Fig. 14.16). Further buildings had been added to the north and northwest of Hawkeridge Mill by this date.

LIDAR hillshade analysis

- 4.37 LiDAR hillshade analysis has been undertaken utilising the DEFRA 2022 Composite Digital Terrain Model 1m data. Data was processed in QGIS with an azimuth of 315, and an exaggerated vertical scale (z10); the results are presented below. In the wider study area some of the recorded ridge and furrow and water meadows are clearly evident. A few of the recorded features within the Application Site are weakly evident and there is little correspondence between the prehistoric and Roman features recorded to the S and southwest of the site and the LiDAR.

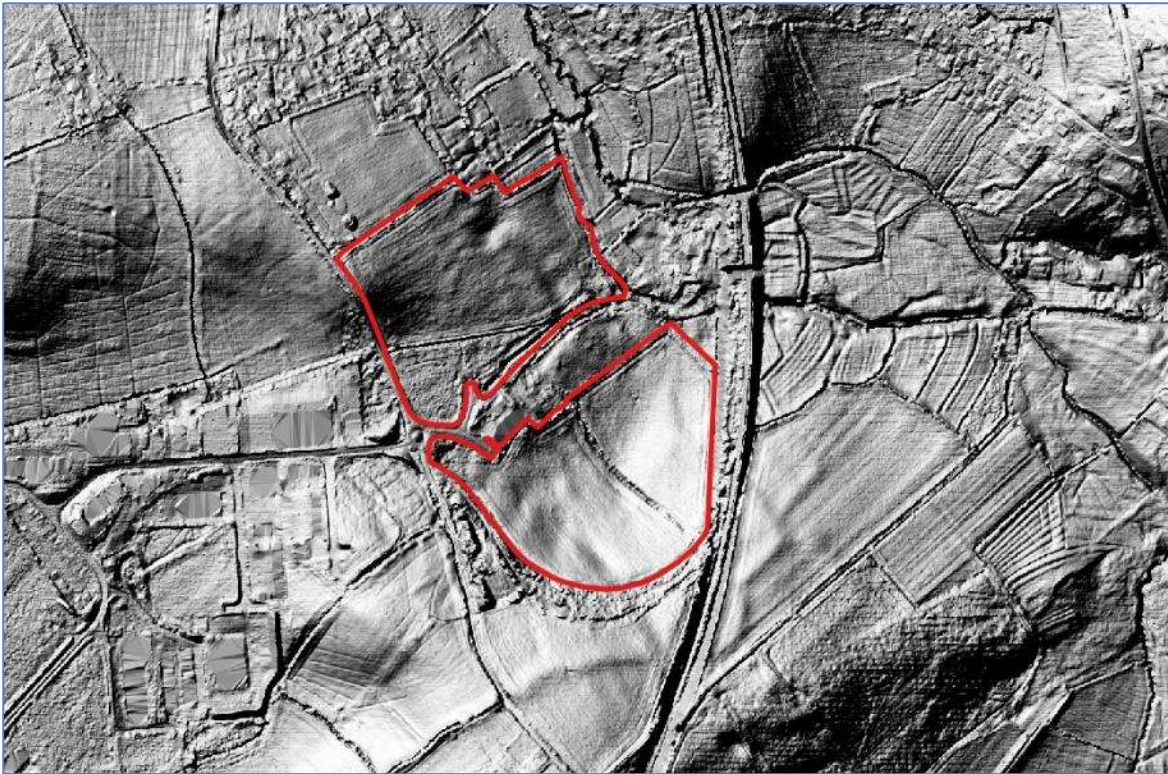


Plate 5 LIDAR Hillshade Analysis using DEFRA 2022 Composite Digital Terrain Model 1m data with Azimuth of 315, z10, Alt35

Aerial Photographic evidence (Appendix 3)

- 4.38 Aerial images, held at the Historic England Archive in Swindon, were inspected in person by the author on 15 January 2026, in addition to a review of the online coverage available including Historic England's APEX and USAAF coverage, NCAP, Cambridge University Air Photographs and Britain From Above. These show many of the former field boundary features mapped as undated at Figure 14.6 or seen in the historic maps at Figures 14.10-14.16. It was not possible to discern any additional possible archaeological features and the areas of recorded Roman and prehistoric archaeology in the fields to the south and southwest are not clearly evident in the coverage.
- 4.39 The May 1945 coverage shows that the curving branch line to the military depot southwest of the Application Site had been constructed by this date, with evidence for a construction haul road passing through the southern part of the Application Site which had broken through two hedgerows. The warehouse building attached to the barn southwest of Hawkeridge Farm was doubled in size between the 1990 and 1995 coverage, with an extension to the southwest. A building between the barn and the long, narrow range to its northeast (south of the farmhouse) was removed between

the 1998 coverage and 2002 Google Earth satellite imagery. The central gable on the west face of the northern range of Hawkeridge Mill was added between coverage of 1963 and 1971, with the cross-gable at the northwestern corner added between coverage of 1990 and 1995. The southwestern corner of the mill appears to have been extended from a flat-roofed, single-storey structure to two storeys with a pitched roof between 2005 and 2016 (although in the 1971 and earlier coverage it was two-storeys here, so presumably this part of the building had become derelict in the late 20th century) A small single-storey extension and conservatory had been added to the south elevation by 2018.

5. HISTORIC LANDSCAPE CHARACTER (FIGS 14.8, 14.17 & 14.18)

Introduction

- 5.1 The above has set out the archaeological and historical baseline for the Application Site and its environs. This section examines the historic landscape character of the Application Site.

Wiltshire Historic Landscape Characterisation (Figure 14.8)

- 5.2 The data for the Wiltshire HLC is presented at Figure 14.8. This shows 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. That this has happened within the Application Site has already been attested to in the map regression section above (Figs 14.10a-14.18) and is illustrated at Figure 14.18, which shows extant field boundaries in relation to what survived on the First Edition Ordnance Survey of 1887. Only two of the Application Site’s internal historic boundaries now survive: the east/west hedgerow in the northern part of the site (Fig. 14.18, 1) and the wet ditch crossing the southern part (Fig. 14.18, 2), along with the external boundary to Hawkeridge Road (Fig. 14.18, feature 10/22) - assuming the latter has not been altered at some stage for road widening. Both internal boundaries appear to be shown on the 1808 Enclosure Map, with the northern hedgerow, 1, forming the northern boundary to the land attached to Hawkeridge Farm on the 1842 Tithe Map (Figs 14.10a & 14.18). This northern hedgerow (1) may be considered ‘important’ under the Hedgerow Regulations 1997 as it initially appears to have existed for 30 years or more (Part 4a) and is ‘...recorded in a document held at the relevant date at a Record Office as an integral part of a field system pre-dating the Inclosure Acts’ (Schedule 1, Part II, Section 5a). However,

historic Google Earth satellite imagery and Google Streetview indicate that the original hedgerow and an associated tree was cut down, if not removed, at some point between 2016 and 2021 and the hedgerow has been replanted or regrown since that time, casting some doubt on its authenticity. The now-ditched boundary (Fig. 14.18, 2) in the south appears to have gradually lost its trees and hedging in aerial images of 1963 and 1971, reaching its present, denuded form by the time of the 1990 coverage. This boundary is no longer hedged and would therefore not meet the definition of 'important' hedgerow under the 1997 act.

- 5.3 The southern boundary of the Application Site is defined by the curving remains of the embankment of a branch railway line to the WWII US Army camp and depot (MWI78722; Fig. 14.18, 4) to the southwest, which the aerial photographs show had been constructed by May 1945. It was not mapped in 1941 (Fig. 14.14), although the HER entry for Hawkeridge Junction suggests the line dates to the 1930s (MWI77590). Regardless of date, the embankment physically separates Hawkeridge Farm from much of its former land to the south and west (as plotted at Fig. 14.17). The hedgerow now forming the northern boundary of the southern land parcel, to the east of Hawkeridge Farm (Fig. 14.18, 5), seems only to have been defined as a boundary between the aerial coverage of 1990 and 1995, and this has been thickened since the mid-2010s with advanced planting for the permitted business park development, such that there are now mature trees along this boundary where once was a large open field crossed by the still extant footpath leading north to Hawkeridge village via the road called North House Drove or Road (feature I on Fig. 14.18). The well-treed mid-19th-century Wilts, Somerset & Weymouth railway line embankment (MWI79700; Fig. 14.18, 3) now forms the eastern boundary of this southern land parcel, the line bisecting land formerly attached to Hawkeridge Farm at the time of the tithe apportionment (Fig. 14.17). The south-westward expansion of the farm and formation of the entrance roads and roundabout have straightened the entrance to Mill Lane (Fig. 14.18, 23) and removed the historic boundaries at the perimeter of the southern land parcel, such that only a short section of historic field boundary survives directly south of the farm and that has been reinforced with the advanced planting associated with the business park (Fig. 14.18, 16). The result of these alterations is that the southern land parcel now reads as a single large field, visually separated from Hawkeridge Farm by new and reinforced field boundaries. The southern field slopes up towards the disused branch line embankment in the southwest and offers long-distance views to the Westbury White Horse from the new business park road into the field which leads off the entrance roundabout (Fig. 14.19, 13).

- 5.4 The northern land parcel reads as a smaller, triangular field north of Hawkeridge Farm with an attenuation area next to Mill Lane added as part of the implementation of the advanced landscaping and enhancement works associated with the business park permission. This field is bordered on the north side by the surviving hedged field boundary (Fig. 14.18, 1), with a much larger field to the north of that which was not part of the farm at the tithe apportionment and which slopes up at the north/northwestern edge to the site's northern, hedged and treed perimeter (Fig. 14.18, 11). This boundary is shown on the tithe map and has been reinforced with advanced planting for the business park within the last 10-12 years or so (the planting had been established by Google Earth satellite imagery captured in 2016). There is no longer any sense of the historic allotments, buildings (a-d on Fig. 14.18) or former field parcels or enclosures that once occupied this area, nor any physical sense of North House Drove (feature I on Fig. 14.18) within the northern area, although the public right of way at the east of the site still follows its course for the most part.
- 5.5 The result of the many changes to the field pattern and land around Hawkeridge Farm, coupled with the changes to the farm itself and extensive changes to Hawkeridge Mill - as documented in the preceding section - is 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 surviving within the Application Site.

6. IDENTIFICATION OF HERITAGE ASSETS BEING POTENTIAL RECEPTORS OF IMPACT FROM THE DEVELOPMENT PROPOSALS

Introduction

- 6.1 From a heritage perspective, built and other assets in the environment are either heritage assets or ordinary assets. Those that are classified as heritage assets may be designated (for example, a listed building or conservation area) or non-designated. The National Planning Policy Framework [NPPF], which contains the Government's national heritage policy, defines 'designated' heritage assets (being World Heritage sites, scheduled monuments, listed buildings, protected wreck sites, registered parks and gardens, registered battlefields or conservation areas), but not non-designated heritage assets. However, in defining the term 'heritage asset', it does by implication determine that those assets which are non-designated are '*assets identified by the*

local planning authority (including local listing)'. Footnote 75 of the NPPF goes on to clarify that: 'Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets'.

- 6.2 More helpfully, under the heading 'What are non-designated heritage assets and how important are they?', paragraph 039 of the Ministry of Housing, Communities and Local Government's 'Planning Practice Guidance: Conserving and enhancing the historic environment' (July 2019 version) states:

'Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes...having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets.

A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.'

- 6.3 The guidance document continues by noting:

'There are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence.

[...]

It is important that all non-designated heritage assets are clearly identified as such. In this context, it can be helpful if local planning authorities keep a local list of non-designated heritage assets...They should also ensure that up to date information about non-designated heritage assets is included in the local historic environment record.

In some cases, local planning authorities may also identify non-designated heritage assets as part of the decision-making process on planning applications, for example, following archaeological investigations...'

6.4 Once its definitions are drawn together, the NPPF identifies heritage assets as being components of the historic environment that can be positively identified as having a degree of archaeological, architectural, artistic or historic interest meriting consideration in planning decisions. Simply being old, being part of an ensemble or area that is - as an assemblage - recognisable as a heritage asset, having a history of use, bearing a similarity to components in the locality that are heritage assets, or conversely being physically distinctive within its setting or wider context does not *per se* transform a built (or other ordinary) asset into a heritage asset. Building on the definition of 'heritage' set out in English Heritage's '*Conservation Principles*' (2008) (being '*all inherited resources which people value for reasons beyond mere utility*'), heritage assets can be distinguished from other components of the environment by the meaning for society that a heritage asset holds over and above its functional utility. So, to be regarded as a heritage asset, a building or structure must have some meaningful archaeological, architectural, artistic or historical interest that gives it a value to society transcending its functional utility.

6.5 The NPPF makes the point that significance (which it defines as '*The value of a heritage asset to this and future generations because of its heritage interest*') derives '*not only from a heritage asset's physical presence, but also from its setting*'. It defines the setting of a heritage asset as being:

'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.'

6.6 Paragraph 207 of the NPPF demands 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...'

6.7 Moreover, as has already been explained, the Historic Environment Good Practice Advice in Planning: 2 reiterates this requirement in its advocated approach to dealing

with heritage assets, which begins '*Understand the significance of the affected assets*'.

6.8 Accordingly, by extension, this statement is required by this policy and associated guidance to identify:

- Designated heritage assets within or (if a designated area-wide asset) including the site, which might potentially receive direct impacts from the Proposed Development of the Application Site;
- Non-designated heritage assets within or (if an area-wide non-designated asset) including the site, which might potentially receive direct impacts from the Proposed Development of the Application Site;
- Designated heritage assets beyond the boundaries of the Application Site, whose settings might potentially receive indirect impacts from the Proposed Development, leading to harm to significance of the heritage asset;
- Non-designated heritage assets beyond the boundaries of the site, whose settings might potentially receive indirect impacts from the development, leading to harm to significance of the heritage asset.

6.9 This section of the statement for the Application Site identifies the heritage assets that might fall into these four categories, and which must therefore be considered to be potential receptors of impacts from the development. Designated and non-designated heritage assets within the site and its environs have been identified through inspection of the National Heritage List for England, Wiltshire Historic Environment Record and Know Your Place websites and the Local Plan; these are discussed where relevant in Sections 4-6 and mapped on Figures 14.2-14.19. Those assets that fall within or include the Application Site will naturally be capable of receiving impacts from development within it, and these are therefore identified automatically below. The assets within the wider environs of the Application Site which may receive indirect impacts by virtue of changes to their settings are identified below as those where the Application Site makes a demonstrable contribution to their significance.

Designated heritage assets within or including the Application Site

6.10 There are no designated heritage assets within or including the Application Site.

Non-designated heritage assets within or including the Application Site

- 6.11 There are no non-designated built heritage assets within or including the Application Site.
- 6.12 Potential buried archaeological assets recorded by the HER within the site and investigated in 2003/4 and 2011 include: MWI1608 - post-medieval field system; MWI74594 - post-medieval field system; MWI74595 - a mix of features including post-medieval ditches and spreads with potential medieval origins, a post-medieval road or driveway and a spread of modern material in the south of the site, most probably associated with construction of the railway embankment; and, MWI74596 - post-medieval pits, drains and field boundaries. Archaeological findspots recorded by the HER within the site include MWI1510 – Roman pottery and MWI1564 – post-medieval pits. Archaeological evaluation of the site by Wessex Archaeology (WA 2011) identified potential settlement remains of medieval and/or post-medieval date in the northeast of the site, in Trenches 2 and 6, with prehistoric pottery in Trench 2 thought to be residual in a post-medieval context, but indicative of prehistoric activity nearby. As a result of these discoveries, an area in the northeast of the site was identified for further archaeological mitigation in the form of a watching brief during construction of the business park, required as Condition 10 of application no. 14/03118/OUT and defined on Parameter Plan C associated with that application.

Designated heritage assets within the wider environs of the Application Site

Introduction

- 6.13 The identification of designated heritage assets lying within the setting of the site and its wider environs, and which have the potential to receive indirect impacts from development at the Application Site through changes which affect the importance contributed to their heritage significance by their settings (Step 1 of GPA 3 (HE 2017; Appendix 2)) has been completed through analysis of information held by the National Heritage List for England (NHLE), Wiltshire HER and Know Your Place websites, coupled with topographical analysis and a visit to the site and its environs to assess views into and out of the site, and intervisibility and co-visibility with heritage assets supported by photography at ground level and with the use of a drone. The Application Site and surrounding roads and footpaths were walked by the author, including Hawkeridge village and Hawkeridge Road, and a total of 257 photographic images was captured to further aid analysis. A review was undertaken of all readily available documentary and cartographic evidence, and an understanding of the development proposals as set out in Section 2, was developed to identify assets which may receive impacts.

Step 1 settings assessment: identification of affected designated heritage assets

- 6.14 There are no designated heritage assets within the environs of the site that can receive direct impacts from the Proposed Development. In terms of indirect effects, the eight listed buildings and one scheduled monument within the 1km study area (Fig. 14.2) were considered when scoping the identification of assets at Step 1 of GPA 3. Of these assets only the Grade II listed Hawkeridge Farmhouse was found to have a historic connection with the Application Site, in addition to its close proximity, and was therefore scoped in. No. 5 Hawkeridge and Court Farm, the only other designated assets within 500m of the Application Site, were found to have no visual or historic connection with the Application Site and were not proximate (5, Hawkeridge, the next closest designated asset, is 160m from the northern site boundary but is well separated from it by built form and a number of well-established field boundaries, including the northern perimeter of the Application Site which has demonstrably been reinforced with additional planting over the past 10-12 years). These assets were therefore scoped out of further assessment. The upper parts of the Church of Holy Trinity at Heywood was distantly (in excess of 900m) visible in some of the more elevated parts of the Application Site in the northwest, but these long range views are not those in which its architectural significance is typically or best appreciated, whilst intervening built form and vegetation will prevent views of the Application Site from

the church itself or its immediate setting. It is therefore considered that the Application Site does not form part of the church's setting that contributes value to its heritage significance, and no key views of the church will be affected. This asset is therefore scoped out of further assessment. Just beyond the study area, very partially and only barely visible from the northwest of the Application Site, Grade II* Heywood House (1.3km distant) was considered and scoped out for the same reasons as the church. The Application Site lies 585m or more distant from the remaining designated heritage assets within the study area and is both distant and separated by built form and mature vegetation to the extent that it does not form a part of the setting of any of these assets which contribute to their significance and these are not taken forward for further assessment. The only designated heritage asset scoped in for further assessment is therefore:

- Grade II listed Hawkeridge Farmhouse NHLE 1021504

Non-designated heritage assets within the wider environs of the Application Site

Step 1 settings assessment: identification of affected non-designated heritage assets

- 6.15 The non-designated Hawkeridge Mill (MW11616) was considered at Step 1 of the settings assessment. It was found to have intervisibility with the Application Site during the site visit, but was historically separate from the land within the Application Site, most of the southern part of which formed part of Hawkeridge Farm. It is physically separated from the Application Site by the brook that runs to the west of the mill. It has been established at 4.27 and from examination of aerial imagery (described at 4.39) that the mill has been divided (in the 20th-21st centuries) into multiple ownerships and extensively modernised and extended upwards and outwards - if not completely rebuilt. It now reads as a modern building, with no appreciable remaining architectural value or legibility in terms of its historical function. It is bounded on two sides (north and west) by 20th-century kennels and other modern buildings, to the east by the railway line, and has had extensions and solar panels added on the south elevation. These changes, coupled with the permitted business park development within the Application Site, mean that Hawkeridge Mill is now largely surrounded by existing or permitted development which has '*fundamentally and permanently removed its rural character*' (Officer Report for application 17/11715/FUL). The mill's setting now makes no contribution to its significance in terms either of the way it is experienced in its surrounds or appreciation of its heritage values, most of which are bound up in its

documented history, its architectural value having been eradicated. It derives none of its relatively low remaining heritage significance from the land within the Application Site, which has no historic connection with the mill, and Hawkeridge Mill is therefore scoped out of further significance and settings assessment.

7. ASSESSMENT OF SIGNIFICANCE

Heritage assets and their level of significance

- 7.1 The NPPF defines significance 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, 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.
- 7.2 The value of heritage assets can be expressed with regard to the component elements of heritage significance defined within Historic England’s ‘Conservation Principles’ (EH 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.
- 7.3 The NPPF more recently (from 2012 to date) has defined significance in terms of a different grouping of heritage interests – that is, architectural; archaeological; artistic; and historic interest. Despite its earlier promotion of the former approach, in its 2019

Advice Note 12 '*Statements of Heritage Significance: Analysing Significance in Heritage Assets*' (HE 2019), Historic England [its page 16] has clarified and advised that, in setting out an assessment of significance for a heritage asset, heritage statements should:

'For each heritage asset, describe the various interests (see PPG paragraph: 006 reference ID: 18a-006-20190723):

Archaeological interest

There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

Architectural and artistic interest

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

Historic Interest

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

Having described the various interests, assess the level of the general significance of the heritage asset and the particular contribution to that significance of any features which would be affected by the proposal, or of its setting...

- 7.4 Indeed, the 2008 English Heritage *Conservation Principles* four sets of values receive no mention in this more recent advice from Historic England. Thus, this statement will adopt the recommended approach from Historic England's 2019 Advice Note 12 in describing the significance of potential receptor assets below.
- 7.5 In order to quantify the relative importance or significance of heritage assets here (as required at PPG Paragraph: 008 Reference ID: 18a-008-20190723) – in other words to provide a 'hierarchy' of significance – the following hierarchy of significance table has been adapted for this assessment from ICOMOS's *Guidance on Heritage Impact*

Assessments for Cultural World Heritage Properties (ICOMOS 2011), to take into account the latest iteration of the National Planning Policy Framework (MHCLG 2025). The ICOMOS guidance was devised as a robust and defensible system for assessing/evaluating heritage significance and impacts.

Table 1 Hierarchy of significance of heritage assets

Heritage Value/Sensitivity	Description
Very High	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 well-preserved historic landscapes with exceptional coherence, time depth, or other critical factor(s). Other buildings or urban landscapes of recognised international importance.
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 townscape 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 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;

Heritage Value/Sensitivity	Description
	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.

- 7.6 Whilst, inevitably, some subjectivity is at times involved in making value judgements, value 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' significance. In these instances, in this statement, the assessment of an asset's significance will be expressed as 'high approaching very high' where it is considered there are attributes present that potentially uplift the basic assessment of high significance 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 significance towards its borderline with high.

Assessment of significance of potential receptor assets

Introduction

- 7.7 The heritage assets that might potentially receive impacts from the Proposed Development have been identified in Section 7 above:

Designated Heritage Assets

- i) Grade II-listed Hawkeridge Farmhouse (NHLE 1021504)

Non-designated Heritage Assets

- ii) Buried archaeological remains within the Application Site recorded by the HER and archaeological fieldwork in 2003/4 and 2011, and to some extent represented on the 1808 Inclosure map.

The heritage significance of the identified Designated Heritage Assets

i) The significance of the Grade II-listed Hawkeridge Farmhouse (NHLE 1021504)

7.8 The listing description for the farmhouse reads:

Grade: II

List Entry Number: 1021504

Date first listed: 05-Nov-1987

List Entry Name: Hawkeridge Farmhouse

Statutory Address 1:HAWKERIDGE FARMHOUSE

HEYWOOD HAWKERIDGE

ST 85 SE

(south side)

4/186 Hawkeridge Farmhouse

II

Farmhouse, now detached house. Mid C17, extended 1860s. Rendered brick, Welsh slate roof, rendered stacks. T-plan. Two-storey, 2-window north east front. Six panelled door in cast-iron tent porch to left of centre, 2-light C19 mullioned casement with hoodmould to left. First floor has two cross windows, dentilled brick eaves cornice. 1860s wing to right has 2-light mullioned casements and cross windows, lateral stack with partly illegible datestone. Rear facing farmyard has 6-panelled door in C19 lean-to porch, pair of small sashes in hollow-chamfered mullioned surround with hoodmould to left and single sash with hoodmould and 2-light mullioned sash to right. First floor has three hollow-chamfered cross windows, the lower centre one lights the stairs and has a hoodmould, dentilled brick eaves. Attached to north west return is 2-storey C19 range with casements and French windows. Interior has mainly C18 and C19 joinery; 6-panelled doors, dogleg stairs with stick and turned balusters, corner cupboard in kitchen with fielded panelled doors and dentilled cornice. Chamfered beams retained in entrance hall. Four-bay original roof, the east end partitioned off and with C17 six-panelled wainscot door.

Architectural and artistic interest

7.9 The historic building recording concluded that the building has not been substantially altered since the later 20th century and possesses ‘....striking features such as the

stone cross-windows and the flagstone flooring display a variety of architectural styles which have been combined to provide a coherent effect, which is a common characteristic of Victorian design' (TVAS 2012, 15). Coupled with the features identified in the listing description it is evident that the farmhouse possesses considerable architectural and aesthetic interest and that this interest is the principal component of its overall heritage significance and the primary reason for its Grade II listing.

Historic interest

- 7.10 The farmhouse possesses historic (illustrative) interest as a surviving example of a Victorian farmhouse in the local vernacular which carefully incorporates elements of an earlier building. It has two surviving curtilage buildings of mid-to-late-19th-century date in the form of a long attached range to the south and Hawkeridge Barn to the southwest, neither of which are mentioned in the listing description, which together with the farmhouse form a loose courtyard plan for the partially-preserved farmstead (HER Ref. MWI70266). Although the Wiltshire Building Record held a file on the property (WBR: File ref. B9012), inspected by the author at Wiltshire and Swindon History Centre, this related entirely to late 20th- and early 21st-century newspaper sales notices which contained no pertinent additional information with regards to the building's historic development or associations, other than suggesting it was historically a dairy farm. The Wiltshire Archives catalogue references to Hawkeridge Farm were examined, but all entries related to the property now called Court Farmhouse (NHLE 1181492) 655m to the northwest of Hawkeridge Farmhouse. The two farms shared the name 'Hawkeridge Farm' until at least 1941, but by the 1961 six-inch Ordnance Survey the name Court Farm had been adopted by the northwestern farm. No evidence was found to demonstrate a historical connection between the two farms and indeed sales particulars for what is now Court Farm demonstrated that there was no overlap in land ownership between the two in the 20th century (Wiltshire Archives Refs 816/52 & 2221/2/34/3). Whilst the tithe apportionment and census returns provide a certain amount of documentary information it therefore seems there is very limited information available on the farm's historic associations. The building's historic interest is therefore considered to represent a modest component of its overall heritage significance.

Archaeological interest

- 7.11 The historic building recording of the farmhouse, undertaken in 2012 (TVAS 2012), identified that the property has considerable archaeological (evidential) interest

vested in its fabric. This revealed evidence for the chronology and phasing of the building, including incorporation of the original 17th-century stone-built cottage into the northeast end of the later portions of the building. The T-shaped plan was only arrived at during late-18th-century or early-19th-century additions and alterations. Archaeological interest therefore makes a considerable contribution to the building's overall heritage significance, particularly given the limited documentary information available.

Assessment of contribution to overall heritage significance made by setting of Hawkeridge Farm

- 7.12 The setting of Hawkeridge Farmhouse is assessed in accordance with the 5-step approach set out Historic England's advice note GPA 3. The farmhouse was identified and scoped-in at Section 6 above as the only asset for further settings assessment following completion of *Step 1: Identify which heritage assets and their settings are affected*.

Step 2 Settings Assessment: 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

- 7.13 Section 4 has established and mapped the historical extent of the land owned by William Dean and occupied by Mary Pile of Hawkeridge Farm at the 1842 tithe apportionment (Fig. 14.17). This demonstrates that all of the southern land parcel within the Application Site was farmed from Hawkeridge Farm at that time (c. 7.25ha), but only a relatively small part of the northern field (c. 1.15ha) which lay within tithe parcel 1853 (Figs 14.10b, 14.17). The northern boundary of parcel 1853 survives as a hedged boundary at the time of the site visit (5 March 2026; Fig. 14.18, 1). Much of the farm's southern and southeastern land was subsequently visually and physically separated from it by the construction of the embanked Wiltshire, Somerset and Weymouth Railway line in the mid-19th century (MWI79700; Fig. 14.18, 3) and the subsequent curving branch line leading to the US Army camp and depot to the west (Fig. 14.18, 4). Nevertheless, satellite imagery demonstrates much of the farmland within and beyond the Application Site remained in agricultural use in 2025 (Fig. 14.17), with some development within the fields at The Ham to the southwest which were the only fields in arable use at the tithe apportionment (Fig. 14.17, parcels 1761 and 1763). Much of the farm's 50 hectares of historic land therefore remains open,

rural and agricultural in character in 2026. The Application Site occupies 8.4ha of the 50ha of land associated with the farm at the tithe apportionment (17%).

- 7.14 Field boundaries have survived less well, with only two internal boundaries remaining within the Application Site (Fig. 14.18, 1 & 2) and the southern and eastern boundaries of the site now formed of treed- and hedged-railway embankments which have substantially interrupted the historic field pattern and physically removed the connection between the farm and its historic land to the south and southeast (Fig. 14.18, 3 & 4). With almost all internal historic hedges, trees and boundaries in the southern land parcel now removed and the introduction of railway embankments on two sides, the realignment of the west end of Mill Lane (Fig. 14.18, 9) and recent addition of a new boundary dividing the land to the east of the farmhouse (Fig. 14.18, 5), much of this part of the farm's setting is now unrecognisable compared to its historic landscape setting in the early- to mid-19th century (cf. Figs 14.10a & 14.10b). The northern parcel too has lost all traces of its former allotments, North House Drove/Road, small buildings in the east, allotments in the southwest, historic trees and all but one internal field boundary.
- 7.15 The operation of the railway line, together with the expansion of Westbury to the south of the farm, development at The Ham to the south, construction of the West Wiltshire Trading Estate to the west and a solar farm development to the southeast have greatly urbanised the farm's southern context and therefore the experience of its setting in this direction, both visually and in terms of the noise and sense of business generated by associated rail and road traffic. During the site visit it was noted that - across the whole of the Application Site - birdsong was heard against a backdrop of considerable traffic noise from the A350 to the east and Hawkeridge Road to the west, as well as periodic noise from trains using the railway line and the distant rumble of military exercises on Salisbury Plain (although the latter was largely a byproduct of the particular wind and weather conditions at the time). The experience of the farm's setting was therefore not one of tranquil, mostly pastoral, farmland as it would have been historically.

Views (Fig. 14.19; Plates 6-20)

- 7.16 The key views to and from Hawkeridge Farmhouse now are from its southwest and northeast, towards (Views 1-4 on Fig. 14.19) and from (Views 5 & 6 on Fig. 14.19) the principal elevations of the building which face in those directions. To the southwest of the farmhouse, the principal elevation facing this direction is best appreciated from

the immediate context of the courtyard in front of the house (Views 1 & 2 on Fig. 14.19), due to the extent of built form to the southwest (NB this is private land which was not accessed by the author). Parts of this elevation can be glimpsed through the yard of the commercial premises (Hawke Ridge Business Park) to the southwest (View 7, Plate 13), but this does not offer the best view of the southwest elevation, of which there are also oblique views from the gated entrance to the farm off Mill Lane (View 8, Plate 6) and close oblique views of the northeast and northwest elevations from a gateway to the rear garden/paddock off Mill Lane (View 9, Plate 7). The long field to the northeast of the farmhouse offers better close-up and longer-range views to the northeast facing elevation - easily the most pleasing elevation aesthetically - including from a public right of way which passes through this field (View 3, Plate 8), which is the northern part of former tithe parcel 1844, and intervisibility (filtered through treed boundaries) between the farmhouse and Hawkeridge Mill.



Plate 6 Oblique view [8] from Mill Lane entrance



Plate 7 Oblique view [9] from Mill Lane gateway to rear of farmhouse



Plate 8 The best view [3] of the farmhouse from the field to the east which lies outside the Application Site, viewed from the public right of way



Plate 9 Oblique view from the Application Site southeast of the farmhouse, the chimneys of which can be seen between the taller trees, just right of the centre of the image



Plate 10 View from the south, looking along the wet ditch towards the farmhouse behind the tree line



Plate 11 View from the disused railway embankment to the southeast of the farmhouse (seen near the right hand side of the image), the business park buildings prominent to the left of the farmhouse



Plate 12 View [13] of the Westbury White Horse from the new road entrance into the southern part of the Application Site



Plate 13 Glimpsed view [7] from the southwest, looking through the business park entrance to the farmhouse beyond



Plate 14 View from the northern part of the Application Site with White Horse on the left and farmhouse positioned behind trees towards the centre of the image



Plate 15 View from the northwest corner of the Application Site, looking towards the farmhouse (centre right, behind the tree line) with the White Horse rising above and to the left of it



Plate 16 Drone view of the farmhouse from the west, with Hawkrigge Mill top left



Plate 17 Drone view of the farmhouse from the north, showing the limited fenestration in the north-facing elevations and the extent of recently thickened planting along Mill Lane to the north of the house



Plate 18 Drone view of the farmhouse from the east, West Wiltshire Trading Estate seen beyond the new roundabout



Plate 19 Drone view of the farmhouse from the south, showing limited window openings in the south gable, northern part of Application Site and Hawkeridge village beyond



Plate 20 Drone view of the farmhouse from the southeast

7.17 The additional planting carried out in relation to the business park planning consent from 2014 (evident from the site visit (Plates 6-20 above) and comparison between historic and latest Google Earth Satellite imagery) has resulted in the considerable thickening of the tree belt and hedging either side of Mill Lane, particularly in areas directly to the north and south of the farmhouse, such that the approaches to the farmhouse along Mill Lane from either direction are now characterised by a sense of

enclosure and the farmhouse is only revealed in oblique and/or close-up views (View 8, Plate 6 & View 9, Plate 7), or glimpsed/sensed through dense treed- and hedged-field boundaries which severely limit the ability to appreciate its architectural significances. The same is true from within the northern and southern land parcels of the Application Site where, looking back at the farmhouse from ground level, trees and hedges limit views of the house to glimpses of its upper storeys and chimney stacks filtered through trees even in winter (Plates 9, 10, 11, 14 & 15; NB the site visit was conducted on 5 March 2026 when there was little or no foliage on the trees). In the vast majority of these views it is impossible to discern the building's historic character or architectural features and it is perceived as the roofscape of a detached dwelling of unknown date or character. Low-level drone flight (around 10m above ground level) revealed some remaining intervisibility of the Application Site with the farmhouse through gaps in the planting, largely involving oblique views two and from the very limited number of smaller windows evident in the less important side elevations of the building (e.g. Plates 17 & 19).

- 7.18 From the more elevated area in the northwest of the Application Site the Westbury White Horse can be seen rising on the hill behind and to the left of the farmhouse, but the farmhouse itself is now well-screened by mature trees from this perspective, such that this does not form a key view of the farmhouse (Plates 14 & 15). The best view of the White Horse from within the setting of the farmhouse was found to be from the relatively recently created access road into the southern land parcel, looking southeast, where it rises clearly above a gap in the tree line above the railway embankment (View 13, Plate 12).

Overall heritage significance of Hawkeridge Farm

- 7.19 Hawkeridge Farm derives its heritage significance primarily from its architectural and aesthetic interest as an example of a Victorian farmhouse carefully incorporating a 17th-century building and variety of architectural styles to a coherent effect. Historic building recording in 2012 demonstrated that it also possesses a good deal of archaeological or evidential value within its fabric, fixtures and fittings which provide evidence for its chronology and phasing. The archaeological interest is amplified by the apparent dearth of documentary evidence for the property, the historic interest of which is therefore relatively modest by comparison with its other values and mainly illustrative. Within the application area it has been demonstrated that the historic setting of the farm, in amongst the mainly pastoral fields that served it, has been greatly eroded since the coming of the railway in the mid-19th century which physically

and visually separated the farm from much of its land to the south and southeast. That erosion continued throughout the 20th century, with a further railway branch line added in the south and the loss of most internal field boundaries and enclosures within the application site through agricultural intensification and mechanisation, along with the creation and subsequent expansion of the business park to the immediate southwest of the farmhouse. Loss of historic landscape character continued in the 21st century, with changes to road layout at the western end of Mill Lane and additional planting and landscaping associated with the business park development granted consent in 2014 (Ref. 14/03118/OUT). That planting, which was intended to screen the farmhouse from the business park development and frame views of its key elevations, has resulted in an increased sense of enclosure of the farmhouse and of the approaches to it along Mill Lane, such that the physical and visual connection between farmhouse and its farmland is now greatly reduced and appreciation of the farmhouse's architectural significance mainly limited to views from the northeast and southwest or oblique views from Mill Lane. It has been noted that the Application Site represents only c.17% of the extensive historic farmland associated with the farmhouse at the 1842 tithe apportionment, and that extensive tracts of this farmland - particularly the pastureland - survive intact beyond the Application Site. The farm's extensive setting therefore makes a modest contribution to the asset's overall significance, a smaller and much-eroded part of which falls within the Application Site, relatively proximate to the farmhouse.

- 7.20 Exercising professional judgement, the Grade II listing of Hawkeridge Farm is considered appropriate and it is therefore assessed as an asset of **medium** heritage significance utilising the criteria in Table 1 above, to which the contribution made by setting is modest.

i) The significance of the buried archaeological remains within the Application Site

- 7.21 In Section 4 it has been established that remains of buildings and a driveway or road (North House Drove) of post-medieval date, but with potential medieval origins, and some potential for prehistoric remains may exist in the northeast of the site, and these areas of interest were identified by planning condition attached to the 2014 business park application to be the subject of archaeological mitigation by watching brief on topsoil stripping. These remains seem most likely to be categorised as of **low** heritage significance utilising the criteria in Table 1 above, but that interest could be elevated to **medium** should the mitigation work identify archaeological finds or features which

can address regional research objectives such as those set out in the South West England Research Framework (SWARF).

PART 2: HERITAGE (INCLUDING ARCHAEOLOGICAL) IMPACT ASSESSMENT

8. ASSESSMENT OF POTENTIAL DEVELOPMENT EFFECTS

Introduction: the nature of impacts and harm

- 8.1 The assessment of harm caused to the significance of heritage assets that follows in this statement is based on the notion that harm can be seen as a continuum, with substantial harm only occurring at its very highest end and less than substantial harm occupying the whole of the remainder. This approach derives from the principles set down as national policy in the NPPF 2024 noting that, at the time of writing, a consultation had recently closed on a revised NPPF that seeks to clarify issues around harm to heritage assets. However, in the absence of accompanying updated practice guidance, and amidst uncertainty as to the extent to which the proposed changes will be adopted, the 2024 iteration of the NPPF and accompanying practice guidance and related case law will be used in this impact assessment.
- 8.2 The NPPF's approach to negative impacts on designated heritage assets (referred to as 'harm') revolves around an undefined threshold between 'substantial' and 'less than substantial' harm. Although the term 'substantial harm' is neither defined in the NPPF nor in related guidance, the Planning Practice Guidance (2019) for Conserving and Enhancing the Historic Environment advises:

'In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.'

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause

less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.'

- 8.3 This carefully worded guidance reflects in part the principal case law to date that touched upon the definition of substantial harm (Bedford Borough Council v Secretary of State for Communities and Local Government, 2013). This related to a judicial review of a planning appeal. Accordingly, its findings in terms of an absolute definition are to a degree ambiguous, as that was not the issue at hand. The case was about process, not fact. However, the judgement is of importance for the light it sheds on an acceptable approach to defining 'substantial harm', which was summed up as follows:

'What the inspector was saying was that for harm to be substantial, the impact on significance was required to be serious such that very much, if not all, of the significance was drained away.'

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.'

- 8.4 Since then, relevant case law has focused to a large part on addressing the matter of achieving an appropriate balance between competing interests in circumstances where the level of harm to the significance of a heritage asset is likely to be less than substantial. In the *Barnwell Manor* case [SDDC CD17 Barnwell Manor Wind Energy Ltd v. East Northamptonshire District Council [2014] EWCA 137] it was found that '*less than substantial harm does not equate to a less than substantial planning objection*'. The judgement emphasised the need to have special regard to impacts on the setting of designated heritage assets and that '*there is a need to give considerable importance and weight to any harm...when carrying out the planning balance*'.

- 8.5 Also in 2014, the *Forge Field* ruling [R (Forge Field Society) v Sevenoaks District Council & Others [2014] EWHC 1895 (Admin)] reiterated Barnwell Manor's approach, finding that the statutory duty imposed under section 66 of the Listed Buildings and Conservation Areas Act 1990 to have special regard to the desirability of preserving

listed buildings and their settings requires that considerable weight must be accorded to any harm to listed buildings or their settings. The judgement concluded:

‘The presumption is a statutory one. It is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. But an authority can only properly strike the right balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation...’

- 8.6 As *Forge Field* noted, despite this statutory presumption, there is a balance to be considered. In the *Razor’s Farm* recovered appeal decision in September 2014 [APP/H1705/A/13/2205929], alluding to *Barnwell Manor*, the Secretary of State noted that *‘an adverse impact [on significance]...is one factor that attracts considerable importance and weight in the balancing exercise. However, it is important to acknowledge that considerable importance and weight is not synonymous with overriding importance and weight’*.

- 8.7 Based on the foregoing, diagrammatically, the sliding scale of harm can be illustrated as shown below.

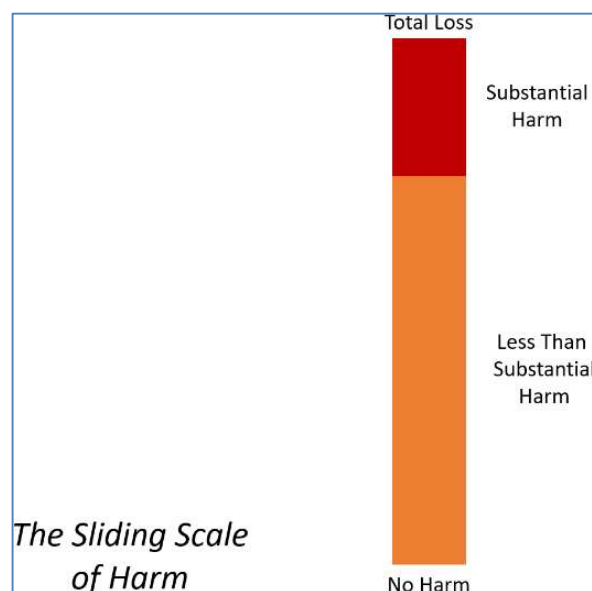


Plate 21 Illustration of the concept of harm being a sliding scale with a threshold at high level along the scale between the NPPF categories of less than substantial harm and substantial harm

- 8.8 In this statement, in reaching an assessment on any harm to the significance of an asset, following the clear guidance set out in the PPG the two categories of harm ‘substantial harm’ and ‘less than substantial’ are each considered as a sliding scale

that will be subdivided into notional bands of harm – starting at the lower end of each category with ‘lower’, then ‘moderate’, and finally ‘upper’– each band in each category of harm still being a gradient and with no hard dividing lines between them. Total loss of significance sits above the very upper end of substantial harm.

8.9 Finally, in this necessarily partial review of key case law relating to harm to the significance of heritage assets, it is useful to note the Secretary of State’s agreement in 2020 with the findings and recommendations of the Planning Inspector in the called-in *Citroen Site* decision [ref: 3226914 - 10 September 2020], which placed renewed emphasis on the approach to applying heritage policies, including those relating to significance, in heritage impact assessments. The *Citroen* decision follows the line of the NPPF that a heritage asset’s significance is made up of two components: the heritage values enshrined in the asset itself, including, potentially, attributes relating to its intrinsic character; and a secondary component of significance that derives from its setting – that is, the contribution made by the setting to significance. Building from that, and as discussed already in this report, the decision considered there are two possible types of impacts from a development proposal – direct impacts affecting the asset’s built fabric or character and indirect impacts affecting the contribution made by its setting to its significance. The *Citroen* Planning Inspector specifically considered the nature of less than substantial harm, referring to it as *‘a sliding scale, spectrum or gradient from (at the bottom) the merest trace of harm, to (at the top) a very significant degree of harm a touch below what would fall within the substantial category of harm’*, as has been illustrated above.

8.10 Pulling these matters together, and given the definition of substantial harm from *Bedford*, *Citroen* reached two important conclusions about indirect harm caused to an asset’s significance by development within its setting – namely:

- *‘It is clear that an asset would have to derive a great deal of its significance from its setting in order for change in its setting to cause it substantial harm’*
- *‘...Assets rich in significance [in the case of Citroen, an important conservation area] are inherently more robust. That is not to say that harm to one aspect is unimportant; but it does indicate that with such assets it takes harm to multiple aspects of significance for harm to be pitched high up the less than substantial scale’.*

8.11 In *Citroen*, the Inspector was considering indirect impacts affecting the significance of an array of designated heritage assets through change potentially causing harm

to the contribution made to significance by their settings. He set out (6.26) a 'correct approach' to assessing impacts that can be adapted, as below, for more general use (as this statement does):

- Understand the significance of the asset in question – as above, the totality of its significance will be made up of two components: the heritage values enshrined in the asset itself, including potentially attributes relating to its intrinsic character; and a secondary component of significance that derives from its setting.
- Assess to what degree any change to the asset itself causes harm (or positive benefit) to its significance.
- Assess to what degree any change to the setting causes harm (or positive benefit) to the significance of the asset.
- In terms of a cumulative approach to the assessment, it may be relevant to ask whether the changes in question (which could be direct impacts or indirect impacts) compound or further exacerbate pre-existing harm to the asset's significance.

8.12 In terms of the last bullet in the preceding, the *Citroen* Inspector considered (15.29) the most appropriate way to tackle the occurrence of 'cumulative harm' in heritage impact assessments:

'To my mind, the cumulative harm should be assessed in three ways. First, it is the proposal that should be assessed initially, followed by a cumulative assessment...Which of these considerations carries more weight, and how these are combined, will be a matter for the decision-maker based on the circumstances. Second, existing harm should never be used to justify additional harm. Policy is unequivocal that the quantum of proposed harm should not be compared with existing harm in assessing whether it would make a significant difference. Finally, if the combination of existing and proposed harm would reach a tipping point then this would be particularly relevant in judging the overall effects.'

8.13 On cumulative harm, the *Citroen* report highlights (6.33-6.34) that:

'...in very simple terms, the analysis is of incremental further harm caused by the scheme. That takes into account what harm has already been caused as the baseline. However, the harm attributable to the scheme under consideration is not the total harm. It is the degree of additional harm. Where this matters is when there

is a very large degree of existing harm, and a further straw may break the camel's back... It is also very important to be clear that analysing the further incremental degree of harm is not a backdoor route to large-scale harm through multiple small increments. The exercise in every case takes as the baseline the latest cumulative baseline. Once any particular tipping point is reached, the next increment may be judged unacceptable.'

8.14 Section 6 of this assessment has identified the heritage assets that might potentially be receptors of impact, whether positive, negative or neutral, from the Proposed Development. This and the following sub-sections of the heritage and archaeology statement set out to:

- Identify impacts resulting from the application proposals and to quantify their magnitude and significance of effects, and,
- Identify appropriate mitigation measures for any adverse effects on heritage assets.

8.15 The heritage impact assessment process has been guided by the NPPF (2024) and PPG, as set out above, and Historic England guidance (HE 2019).

Assessment of Potential Development effects and their Significance of Effects

Hawkeridge Farmhouse

Step 3 Settings Assessment: Assess the effects of the Proposed Development, whether beneficial or harmful, on the significance or on the ability to appreciate it.

8.16 It has been established in Part 1 of this report that the farmhouse cannot be subject to direct effects from the Proposed Development, and that only indirect effects resulting from changes to the setting of the farmhouse can arise. In that respect, it has been found that setting makes only a modest contribution to the total heritage significance of the farmhouse. Most of its significance is vested in its architectural/aesthetic and archaeological interests which will remain unaffected by the Proposed Development. The historic landscape character assessment at Section 6 has shown that the integrity of the historic field system belonging to Hawkeridge Farm has been greatly eroded by modern farming practices, with only two historic internal field boundaries now surviving within the Application Site, neither with their historic

hedgerows remaining intact. The Application Site itself, although proximate to the asset, forms only a modest proportion (c. 17%) of the farm's historic setting of c. 50 hectares of mostly pastureland, whilst the illustrative masterplan indicates that new built form will occupy c. 4.6ha of those 50ha (c.9%), with significant landscape buffers to be provided to the north, south, southwest, northwest and east of the farmhouse. The primary SANG areas proposed to the east/southeast and northeast of the farmhouse will enable retention of a wide rural outlook from the more significant northeast facing elevation of the farmhouse, filtered through the trees and hedge line bounding the northwest and southeast sides of the long pasture field situated to the northeast of the house. The pasture field lies outwith the Application Site area in separate ownership.

- 8.17 The Officer Report for the 2014 business park application considered the effects of that development upon the listed building, concluding *'Further information is required regarding the material palette which can be subject to a condition of any approval but in conclusion it is considered that the Proposed Development by reason of the substantial planting, limitations on buildings heights and lighting adjacent to the historic building and when taken with the material palette, the development would lead to a less than substantial harm to the setting of the Grade II Listed Building..... The proposal is therefore considered to have an impact upon the wider setting of the Grade II Listed Building but it would not remove the setting of the Grade II Listed Building all together due to the immediate setting (which is not within the ownership of the applicant) being retained. The impact the proposal would have on the wider setting of the Grade II Listed Building has not been considered to be significant and the public benefits of the scheme are considered to outweigh this impact.'*
- 8.18 This assessment has established that the proposed planting referred to in the officer report has since been established and has matured considerably over a period of 10-12 years, creating a much greater sense of enclosure of the farmhouse and separation from the Application Site compared to the situation in 2014, such that the potential for visual effects on the wider setting of the farmhouse is much reduced, whilst the immediate setting is retained as was the case then due to the pasture field to the northeast remaining in separate ownership. A parameter plan (Parameter Plan C, Angus Meek Architects) was agreed as part of the 2014 application, which is included at Plate 22 below. The parameter plan shows that building heights for development resulting from that application was to be restricted to 10m to eaves to the more immediate northwest and southeast of the farmhouse, rising to 13m at eaves just

beyond these areas. The buffer to the nearest built form to the north of the farmhouse was proposed to be set at 32m and that to the south at approximately 56m from the respective nearest elevations (considered appropriate by the Conservation Officer for the business park development), with control of lighting proposed in these areas (Plate 22 shows the building height and other key parameters agreed for the business park application). Subsequent Reserved Matters applications were approved for 20 No. commercial units 40m to the south, with heights varying from 7.7m to 8.2m (Ref. 17/01201/REM) and for four large warehouse units to the north of the farmhouse in accordance with the 10m and 13m height parameters and ecological buffer zones set for the 2014 outline application.

- 8.19 The present application proposes an increased northern buffer to new buildings of 41m+ compared to the 32m distance approved in 2014, where the reinforced planting either side of Mill Lane now creates a strong sense of separation from the Application Site. A more generous buffer to new built form of 82m+ (compared to 56m in the 2014 application) is proposed to the more open southeast elevation of the farmhouse. New building height will be lower than the parameters set by the 2014 outline application (Plate 22): approximately 9.5m ridge height for housing, which is the most proximate form of development to the listed building; approximately 6m for the drive thru and retail units; and, 13m for the care home). Building height will be lower than the parameters set in 2014, and new building will be of a smaller scale and more dispersed form than the business park. Building massing will, as a result, be considerably less monolithic than that of a business park and of a more human scale, commensurate with the domestic setting of the farmhouse as it is experienced now, with the potential for a complimentary material palette and neutral colours that will further mitigate any residual harm to the farmhouse's setting. With measures to ensure appropriate control of lighting in the vicinity of the farmhouse, the potential for adverse effects upon its extensive wider setting from the currently Proposed Development is considerably reduced compared to the potential adverse effects from the scheme agreed within the parameters set for the previously approved (2014) business park development outline application and for the scheme for four warehouse units approved under subsequent Reserved Matters application 16/06752/REM, whilst the increased buffers to development areas to the north and south will lead to the retention of more of its immediate setting. Additional landscape planting between the farmhouse and development to the south will provide further mitigation where maximum building heights are slightly higher than those for the 20 commercial units approved under Reserved Matters application 17/01201/REM. With new built form

located further from the farmhouse in this direction and massing of a more human scale commensurate with the now-domestic nature of the farmhouse, the residual adverse effects are anticipated to be reduced compared with application 17/01201/REM. The low-rise nature of the drive thru, residential units and associated surface car parking c. 100-110m northwest of the farmhouse, coupled with existing planting on Mill Lane and proposed new planting to the east of those new buildings and their associated parking areas will further limit effects upon the immediate setting of the farmhouse in that direction. Further to the northwest, the proposed new care home and new housing development will restrict the availability of middle-distance views to the farmhouse from Hawkeridge Road. Despite the planting scheme implemented following the 2014 business park outline consent, 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, leading to an increased sense of urbanisation, and thus there is considered to be a residual level of harm to the extensive wider setting of the farmhouse which, on balance and exercising professional judgement, is considered to lie at the lower end of the scale of less than substantial harm.

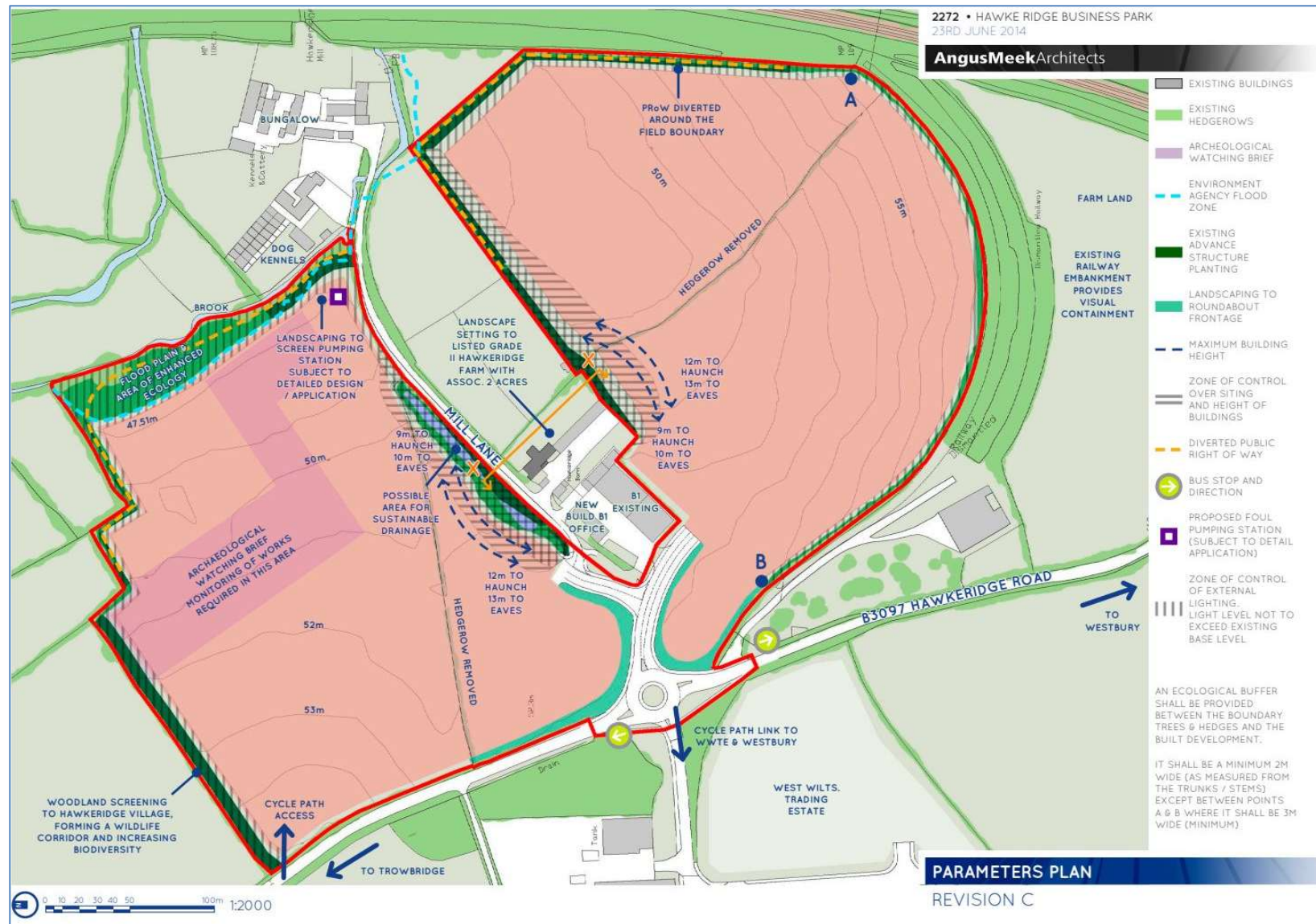


Plate 22 Parameter Plan (Rev. C) approved in respect of the 2014 business park application

Settings Assessment Step 4: Explore ways to maximise enhancement and avoid or minimise harm & Step 5: Make and document the decision and monitor outcomes.

- 8.20 Whilst consideration could be given to further planting in the hedge/tree gaps on the boundaries closest to the farmhouse to further mitigate these effects, further enclosure of the farmhouse with planting could lead to overshadowing and, on balance, it is felt the existing and indicative proposed additional planting will provide sufficient visual screening between the listed building and Application Site. As noted above, the proposed planting around the retail units and drive thru to the west/northwest of the farmhouse should also soften the effects of new development seen from the farmhouse when looking in this direction, in which buildings of the West Wiltshire Trading Estate already feature prominently.
- 8.21 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.

Archaeology

- 8.22 An archaeological strategy was required as Condition 10 of the 2014 consent and a Written Scheme of Investigation was produced to address that condition which outlined an archaeological mitigation area in the northeast of the site designed to cover the areas of potential medieval and post-medieval settlement either side of North House Drove (APS 2014). The condition was updated through 15/04092/VAR to tie it to the commencement of development of individual plots which lay within the extent of the identified archaeological mitigation area (shown on Plate 22).
- 8.23 Much archaeological work has taken place within the site environs since the WSI was prepared in 2014, so it is therefore appropriate to consider whether the previously proposed strategy remains valid. This assessment has explored the reasons why the Roman settlement activity found more recently in areas relatively close to the

southwest and south of the site did not appear to extend into the Application Site when evaluated in 2003/4 and 2011. A strong correlation has been identified between recorded Roman activity south and southwest of the Application Site and an area historically known as 'The Ham Field(s)', which suggests that prehistoric and Roman occupation was contained within that area, which is defined by the course of two brooks. The historic boundary of 'The Ham Fields' is approximately 80m from the Application Site at its closest points to the southwest and south, and the recorded prehistoric and Roman settlement features do not appear to extend northwards beyond that boundary. The 2011 geophysical survey and previous evaluations undertaken within the Application Site are therefore considered to remain valid.

- 8.24 This assessment has reconsidered the extent of the proposed area of archaeological mitigation and finds that this largely remains valid. However, based upon examination of the 1808 Inclosure map (Fig. 14.10a & 18) it is proposed to make a slight extension (Fig. 14.20) to ensure that the northern part of that area fully encompasses areas in which the map shows small buildings adjacent to the course of the historic North House Drove (buildings a and b on Figs 14.18 & 14.20). A Written Scheme of Investigation has been prepared by BBHC and is included at Technical Appendix 14.3 of the Environmental Statement. This sets out the detailed methodology for the proposed archaeological mitigation works.

Hedgerows and field boundaries

- 8.25 Two historic internal field boundaries are proposed to be removed as part of the proposals. The northern of these is a hedged boundary which initially appears to meet the definition of an 'important' hedgerow under the 1997 Hedgerow Regulations and would therefore require local authority consent to remove. However, historic Google Earth satellite imagery and Google Streetview indicate that the hedgerow and an associated tree was cut down at some point between 2016 and 2021 and has been replanted or regrown since that time, which casts doubt on its authenticity. The southern boundary is a wet ditch with no hedgerow remaining. The removal of these boundaries, which this assessment has demonstrated have lost almost all of their historic landscape character, integrity and authenticity, was approved in respect of the 2014 planning consent for a business park on the site (before the cutting down of the northern hedgerow boundary). Their remaining heritage interest is considered to be minimal and, as a result, their proposed loss is not considered to have a significant impact upon the historic environment.

Cumulative Effects

8.26 The following schemes have been identified for consideration of cumulative effects:

- Glenmore Farm - outline permission for up to 145 No. dwellings (PL/2021/03749)
- Land off Storridge Road - outline application for up to 165 No. dwellings submitted but pending registration.
- 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)

8.27 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 field system (of c. 50ha) associated with Hawkeridge Farmhouse at the time of the tithe map. Although the developments will not be 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, but it is considered that the adverse effect remains at the lower end of less than substantial harm due to the preservation of the farmhouse's immediate setting and all of its inherent archaeological, architectural and historic values from which the vast majority of its significance is now derived.

Justification for Harm to Heritage Assets

8.28 The Planning (Listed Buildings and Conservation Areas) Act 1990 requires that local planning authorities shall have special regard to the desirability of preserving listed buildings or their setting or any features of architectural or historic interest which they possess. This is consistent with the requirements of Local Plan heritage policy CP58. Where harm occurs, the NPPF sets out the test whereby this must be justified. This assessment has found that less than substantial harm at the lower end of the scale would be caused by the implementation of the proposed development to the significance of Hawkeridge Farmhouse (both by the development itself and cumulatively when considered alongside other pending developments/applications).

8.29 NPPF Paragraph 213 requires ‘clear and convincing justification’ to be provided for any harm to, or loss of, the significance of a designated heritage asset from development within its setting. Case law demonstrates that the ‘clear and convincing justification’ required to justify heritage harm is provided through the sequential tests set out at NPPF Paragraphs 214-216 and the usual planning balance tests, rather than as a stand-alone detailed analysis and justification for each element of heritage harm identified [updated NPPF paragraph numbers in square brackets]:

- In *Bedford* [Bedford BC v SSCLG [2013] EWHC 2847 (Admin)] – the judge held that the clear and convincing justification required in what is now paragraph [213] of the NPPF does not create a freestanding test, and *‘to the extent that there is a test, it is to be found in paragraphs [214-216]’*.
- In the *Pugh* case [R (Pugh) v Secretary of State for Communities and Local Government[2015] EWHC 3 (Admin)], , Gilbert J said *“Mr Harwood points out that paragraph [213] uses the phrase “clear and convincing justification.” It might be thought difficult to be convincing without being clear, but it seems to me that the author of NPPF is saying no more than that if harm would be caused, then the case must be made for permitting the development in question, and that the sequential test in paragraphs [214-215] sets out how that is to be done. So there must be adherence to the approach set out, which is designed to afford importance in the balance to designated heritage assets according to the degree of harm. If that is done with clarity then the test is passed, and approval following paragraph [215] is justified.’*

8.30 In this case of less than substantial harm the test at NPPF Paragraph 215 pertains. This requires that the identified less than substantial harm to the heritage significance of Hawkeridge Farmhouse must be outweighed by the public benefits of the proposals in order for that harm to be justified.

8.31 Public benefits are usefully defined within the 2019 Planning Practice Guidance (Paragraph: 020 Reference ID: 18a-020-20190723) as follows:

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit...

Examples of heritage benefits may include:

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

8.32 The public benefits of the scheme identified in the Planning Statement that address the three overarching objectives required to be met for sustainable development, as identified at Paragraph 8 of the NPPF, include:

- **Economic** - The economic benefits of the proposal would be in the form of the direct employment opportunities during the construction phases of the development.
- **Social** - In the context of social benefits, the proposal would provide a number of additional market and affordable dwellings which contribute towards the current shortfall across the county.
- **Environmental** - With regards to environmental benefits, the scheme safeguards an area to deliver ecological enhancements across the development area.

8.33 These benefits are explored in greater detail in the Planning Statement accompanying the application, which also deals with the matter of the planning balance. However, it is important to stress both that considerable weight must be accorded to any harm likely to be caused to designated heritage assets and that '*The provision of new open-market and affordable houses and the associated economic activity are very weighty matters in economic and social terms*', as the 'Razor Farm' recovered appeal decision noted (APP/H1705/A/13/2205929 para 10.51).

9. ACKNOWLEDGEMENTS

8.1 Bristol & Bath Heritage Consultancy Limited would like to acknowledge the valuable assistance of Chris Beaver at PlanningSphere and the staff of Wiltshire and Swindon History Centre, Wiltshire Buildings Record and the Historic England Archive.

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WA (Wessex Archaeology) 2011 *Hawkeridge Farm, Westbury, Wiltshire: Archaeological Evaluation Fieldwork Report*. Report ref. **79280.01**

Online Resources Consulted

Britain from Above website

Cambridge University Air Photos website

National Collection of Aerial Photography (NCAP) website

Wiltshire Know Your Place website

Wiltshire Council website

FindMyPast: newspaper archives

Heritage Gateway

Historic England Apex Website

Historic England Aerial Mapping Explorer
 Historic England Archive (website and in person)
 The Genealogist: tithe apportionment records
 Archaeology Data Service website

Cartographic Sources Consulted

1808 Westbury Inclosure Map and Award
 1842 Tithe map for the parish of Westbury
 1887 Ordnance Survey 25 inch map
 1901 Ordnance Survey 25 inch map
 1924 Ordnance Survey 25 inch map
 1941 Ordnance Survey 25 inch map
 1961 Ordnance Survey 6 inch map
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Manuscript Sources Consulted at Wiltshire Archives

EA76 1808 Westbury Inclosure Map and Award

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816/52 Sale particular [dated 1911] with plans and photographs of outlying portions of the Leighton estate Westbury

2221/2/34/3 Sale particulars (1936-1969): in particular, Westbury (1961. Command Ordnance Depot (Lodgewood farm), with plan)

540/347 Lease of Hawkeridge Farm [1764], parties: Phipps, Rodoway

APPENDIX 1: GAZETTEER OF SITES REFERENCED IN THE TEXT AND FIGURES

Listed Buildings

NHLE Ref.	Name	Status	Listed	Amended
1021503	5, Hawkeridge	Grade II listed building	05/11/87	00/01/00
1021504	HAWKERIDGE FARMHOUSE	Grade II listed building	05/11/87	00/01/00
1181474	LUDLOW MONUMENT IN THE CHURCHYARD ABOUT 2 METRES EAST OF CHURCH OF HOLY TRINITY	Grade II listed building	05/11/87	00/01/00
1181492	COURT FARMHOUSE	Grade II listed building	05/11/87	00/01/00
1284973	GATE PIERS TO HEYWOOD HOUSE	Grade II listed building	05/11/87	00/01/00
1364266	CHURCH OF HOLY TRINITY	Grade II listed building	05/11/87	00/01/00
1364268	WEST LODGE	Grade II listed building	05/11/87	00/01/00
1387285	BLENCHES MILL AT BLENCHES MILL FARM	Grade II listed building	25/05/99	00/01/00
1013102	Moated site on the West Wiltshire Industrial Estate	Scheduled Monument	25/09/74	29/03/90

HER Monuments

HER Ref.	Name	Type	Period
MWI1448	Neolithic Axe, The Ham	FINDSPOT	Neolithic
MWI1462	Bronze Age Pottery, The Ham	FINDSPOT	Bronze Age
MWI78098	Prehistoric Ditch, Plot 290 West Wiltshire Trading Estate	DITCH	Early Bronze Age to Late Iron Age
MWI1468	Middle/Late Bronze Age Ditches and Pits, South west of Blenches Mill Farm	SETTLEMENT	Bronze Age
MWI1501	Romano-British Pottery, The Ham	FINDSPOT	Roman
MWI1507	Romano-British Pottery, East of Glenmore Farm	FINDSPOT	Roman
MWI1508	Romano-British Grave, Northeast of Glenmore Farm	BURIAL	Roman
MWI1509	Romano-British Grave, East of Glenmore Farm	BURIAL	Roman
MWI1510	Romano-British Pottery, South West of Hawkeridge Farm	Associated finds	Roman
MWI1481	Romano-British Settlement, Westbury Ironworks	SETTLEMENT	Roman
MWI1503	Romano British Well, East of Glenmore Farm	ENCLOSED SETTLEMENT	Roman
MWI1510	Romano-British Pottery, South West of Hawkeridge Farm	Associated finds	Roman
MWI1585	Romano-British Settlement, Glenmore Farm	SETTLEMENT	Roman
MWI78329	Roman Ditches, North West of Hawkeridge Park	DITCH	Roman
MWI1515	Anglo-Saxon Bone Implement, East of Glenmore Farm	FINDSPOT	Saxon
MWI78059	Medieval Ditch, Plot 290, West Wiltshire Trading Estate	DITCH	Saxon to Medieval
MWI1530	Medieval Pottery, The Ham	FINDSPOT	Medieval
MWI1517	Medieval Moat, West Wilts Industrial Estate	MOAT	Medieval
MWI1525	Heywood	SETTLEMENT	Medieval
MWI1526	Hawkeridge	SETTLEMENT	Medieval
MWI1538	Deer Park, East of Brooke House Farm	DEER PARK	Medieval
MWI1548	Medieval Ridge and Furrow, North of Sewage Works	RIDGE AND FURROW	Medieval
MWI1564	Post Medieval Pit, South West of Hawkeridge Farm	QUARRY	Post Medieval
MWI73515	Post Medieval Water Meadow, West of Dursley	WATER MEADOW	Post Medieval
MWI73515	Post Medieval Water Meadow, West of Dursley	WATER MEADOW	Post Medieval
MWI73526	Ridge and Furrow, South of Yarnbrook	RIDGE AND FURROW	Post Medieval
MWI73526	Ridge and Furrow, South of Yarnbrook	RIDGE AND FURROW	Post Medieval
MWI73527	Field Boundary, North of Dursley	FIELD BOUNDARY	Post Medieval
MWI1562	Post Medieval Water Meadow, West of Bitham Brook	WATER MEADOW	Post Medieval
MWI1617	Blenches Mill Farm	WATERMILL	Early C17 to Late C19
MWI70264	Court Farm (Hawkeridge Farm)	FARMSTEAD	C17
MWI70264	Court Farm (Hawkeridge Farm)	FARMSTEAD	C17
MWI70265	Site of Lodge Wood Farm	FARMSTEAD	C19
MWI70265	Site of Lodge Wood Farm	FARMSTEAD	C19
MWI80162	Line of the Old Road from Westbury to Trowbridge	ROAD	Mid C18 to Unknown
MWI70296	Site of Outfarm in Heywood	OUTFARM	C19
MWI70295	Church Farm	FARMSTEAD	C19
MWI70294	Home Farm (Heywood Farm)	FARMSTEAD	C19
MWI70266	Hawkeridge Farm	FARMSTEAD	C19
MWI70265	Site of Lodge Wood Farm	FARMSTEAD	C19
MWI70267	Site of Biggs' Bush Farm	FARMSTEAD	C19
MWI79700	Wiltshire, Somerset and Weymouth Railway	RAILWAY	Mid C19
MWI77590	Hawkeridge Railway Junction	RAILWAY JUNCTION	Late C19 to C20
MWI58605	1 Hamfields or 1 The Ham	SEMI DETACHED HOUSE	C20
MWI60621	7 The Ham	SEMI DETACHED HOUSE	C20

MWI76755	2 The Ham	SEMI DETACHED HOUSE	C20
MWI1616	Hawkeridge Mill	MILL	Early 20th Century to C21
MWI76826	83 or 83a and 83b Hawkrigde Park	DETACHED HOUSE	Modern
MWI1587	Modern Building Cropmarks, The Ham	ARMY CAMP	Second World War
MWI78722	WWII US Army Camp and Depot, The Ham, Westbury	ARMY CAMP	Second World War
MWI1632	Undated Posthole, South West of Blenches Mill Farm	POST HOLE	Unknown
MWI74888	Undated Field Boundary, North of the Sewage Works	FIELD BOUNDARY	Unknown
MWI78328	Undated Boundary Bank, North West of Hawkeridge Park	BOUNDARY BANK	Unknown
MWI1584	Undated Ditches, East of Brook House	LINEAR FEATURE	Unknown
MWI1608	Undated Field System, West of Hawkeridge Mill	FIELD SYSTEM	Unknown
MWI1608	Undated Field System, West of Hawkeridge Mill	FIELD SYSTEM	Unknown
MWI74335	Undated Ditches, Glenmore Farm	DITCH	Unknown
MWI74594	Undated Enclosures, West of Hawkeridge Mill	ENCLOSURE	Unknown
MWI74595	Undated Field Boundaries, West of Hawkeridge Mill	FIELD BOUNDARY	Unknown
MWI74596	Undated Pits, West of Hawkeridge Mill	PIT	Unknown
MWI74887	Undated Ring Ditch, North of the Sewage Works	RING DITCH	Unknown
MWI74889	Undated Ditches, North of the Sewage Works	DITCH	Unknown
MWI74890	Undated Pits, North of the Sewage Works	PIT	Unknown

HER Events

HER Ref.	Name	Date
EWI1147	Excavation at Romano-British Settlement, Westbury Ironworks	1879
EWI5545	Desktop assessment of Water-Mills of West Wiltshire	1969
EWI3359	Desktop assessment of the Moated Site	1980
EWI4848	Assessment of the A350 Westbury Bypass Route	1997
EWI5113	Archaeological Evaluation at The Ham, Westbury	2000
EWI5121	Desk Based Assessment of the Moated Site on the West Wilts Industrial Estate	2001
EWI5573	Watching Brief on Land between Hawkeridge Pumping Station and Westbury Sewage Treatment Works, Westbury	2002
EWI6551	Watching Brief on Geotechnical Test Pits on the Westbury Eastern Bypass	2002
EWI6547	Evaluation on the Proposed Westbury Eastern Bypass	2003
EWI6552	Geophysical Survey on the Westbury Eastern Bypass	2003
EWI7005	Geophysical Survey on the Glenmore Link, Westbury Bypass	2004
EWI6630	Fieldwalking and Evaluation on the Proposed Westbury Bypass: Stage 5	2008
EWI6832	Magnetometer Survey at Hawkeridge Farm, Westbury	2010-11
EWI7293	Evaluation at Hawkeridge Farm, Westbury	2011
EWI8356	Research into the origins of the boundary of the Hundred and Parish of Westbury	2012
EWI6925	Archaeological Evaluation at Vivash Park, Westbury	2012
EWI7118	Geophysical Survey of a Moated Site at Brook, Hawkeridge	2012
EWI7197	Building Heritage Assessment at Hawkeridge Farm	2012
EWI7347	Desk Based Assessment of Land at Blenches Mill Farm	2012
EWI7348	Watching Brief at Northacre Industrial Park	2013
EWI7346	Evaluation at Blenches Mill Farm	2013
EWI7703	Desk Based Assessment at Land at Glenmore Farm, Westbury	2014
EWI7708	Geophysics at Land at Glenmore Farm	2014
EWI8895	Geophysical Survey of West of Hawkeridge	2014
EWI7896	NAIS: Aerial Investigation and Mapping Across West Wiltshire	2014
EWI8002	Evaluation on Land at Glenmore Farm	2015
EWI8482	Evaluation at 19 Hawkeridge	2016
EWI8669	Evaluation of Land at Nos 2-3 The Ham, Westbury	2017
EWI9244	Evaluation of Land West of Cory Way, West Wiltshire Trading Estate	2018

EWI9278	Evaluation at Plot 20A, West Wiltshire Trading Estate	2018
EWI9517	Watching Brief at Westbury Wastewater Outfall Pipeline	2019
EWI9579	Evaluation at Plot 290B, West Wiltshire Trading Estate	2019
EWI9946	Strip, Map and Sample Excavation, Plot 290B, West Wiltshire Trading Estate	2021
EWI10004	Watching Brief at Hawkeridge Road, Heywood	2022
EWI10172	Archaeological Evaluation on Land off Storridge Road, Westbury	2022

Portable Antiquities Scheme Data

PAS ID	Type	Period
CCI4BA36ED9002579B45	COIN	IRON AGE
PAS5A37C500001417	BROOCH	ROMAN
PAS4C21CF160016C7	COIN	ROMAN
PAS4BE2AA8B00156D	COIN	ROMAN
PAS4BE2A51400174E	COIN	ROMAN
PAS65FED789001933	MOUNT	EARLY MEDIEVAL
PAS66DAD50B001F4E	COIN	MEDIEVAL
PAS64B5525A001F13	BRIDLE BIT	MEDIEVAL
PAS5A3A76ED001C6B	COIN	MEDIEVAL
PAS5A37A3E9001234	SCABBARD	MEDIEVAL
PAS4C220C85001124	COIN	MEDIEVAL
PAS4C22087B0019DB	COIN	MEDIEVAL
PAS4C22067C001F27	COIN	MEDIEVAL
PAS4C22030B0014D6	COIN	MEDIEVAL
PAS4BE2AC45001A85	COIN	MEDIEVAL
PAS4BE17F49001193	LADLE	MEDIEVAL
PAS4BE17C5A00102E	COOKING VESSEL	MEDIEVAL
PAS4BE1529C0015CC	RING	MEDIEVAL
PAS4BE14C250017D5	SEAL MATRIX	MEDIEVAL
PAS4BE147BD001381	BUTTON	MEDIEVAL
PAS4BE14421001004	FINGER RING	MEDIEVAL
PAS5A37EED1001EDC	COIN	POST MEDIEVAL
PAS5A0AD5D10011D3	DRESS HOOK	POST MEDIEVAL
PAS4C221247001837	COIN	POST MEDIEVAL
PAS4C21EC80001CF4	COIN	POST MEDIEVAL
PAS4C21E762001491	COIN	POST MEDIEVAL
PAS4BE2BD50001A53	TOKEN	POST MEDIEVAL
PAS4BE2BB84001A2F	JETTON	POST MEDIEVAL
PAS4BE2B8450013DE	COIN	POST MEDIEVAL
PAS4BE2B64E001AAD	COIN	POST MEDIEVAL
PAS4BE2B3C2001CD7	COIN	POST MEDIEVAL
PAS4BE1763C001F83	SPOON	POST MEDIEVAL
PAS4BE17203001BC3	HOOKE TAG	POST MEDIEVAL
PAS64E8A001001761	TAG	MODERN
PAS5A37B31B001656	UNIDENTIFIED OBJECT	UNKNOWN

APPENDIX 2: RELEVANT STATUTE, POLICY AND GUIDANCE

STATUTE

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 (2024) 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).

Conservation Areas

Conservation Areas are designated by the local planning authority under Section 69(1)(a) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'), which requires that *Every local planning authority shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance*. Section 72 of the Act requires that *special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area*.

The requirements of the Act only apply to land within a Conservation Area, and not to land outside it.

NATIONAL PLANNING POLICY

National Planning Policy Framework (NPPF) 2024

NPPF (2024), 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 (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.*

Defining Heritage Significance

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 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.*

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 (2024) 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 (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.*

NPPF (2024) Paragraph 213 states *Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional*

The footnote to this final paragraph bullet point further clarifies: *Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.*

NPPF (2024) Paragraph 214 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 (2024) Paragraph 215 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 (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.*

NPPF (2024) paragraph 218 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.*

The footnote to this paragraph further clarifies: *Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.*

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 214 or less than substantial harm under paragraph 215, 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 (2024) Paragraph 219 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

Wiltshire County Council Planning Policy

At the time of writing the emerging Wiltshire Local Plan had recently (May 2026) been formally withdrawn. Therefore, the Wiltshire Core Strategy Development Plan Document (DPD), adopted January 2015, is the primary document detailing policy on the Historic Environment in the County. The key heritage policy from this document, CP58, is detailed below.

Wiltshire Core Strategy Policy CP58

Core Policy 58 aims to ensure that Wiltshire's important monuments, sites and landscapes and areas of historic and built heritage significance are protected and enhanced in order that they continue to make an important contribution to Wiltshire's environment and quality of life. Heritage assets include:

- listed buildings
- conservation areas
- scheduled ancient monuments
- registered parks and gardens
- registered battlefields
- world heritage sites
- non-designated heritage assets such as buildings and archaeological sites of regional and local interest.

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
- 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.

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 (2024), 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.

APPENDIX 3: AERIAL PHOTOGRAPHS CONSULTED AT HISTORIC ENGLAND ARCHIVE

Full single listing - Verticals, Standard order Customer enquiry reference: 152311												
Sortie number	Library number	Camera position	Frame number	Held	Centre point	Run	Date	Sortie quality	Scale 1:	Focal length (in inches)	Film details (in inches)	Film held by
RAF/106G/UK/1654	436	RS	4052	P	ST 866 539	21	11 JUL 1946	AB	10000	20	Black and White 8.25 x 7.5	RAF
RAF/106G/UK/1654	436	RS	4078	P	ST 872 522	22	11 JUL 1946	AB	10000	20	Black and White 8.25 x 7.5	RAF
RAF/106G/UK/1654	436	RS	4079	P	ST 866 521	22	11 JUL 1946	AB	10000	20	Black and White 8.25 x 7.5	RAF
RAF/CPE/UK/1821	501	RP	3195	P	ST 873 527	17	04 NOV 1946	A	10000	36	Black and White 8.25 x 7.5	NMR
RAF/CPE/UK/1821	501	RP	3196	P	ST 867 526	17	04 NOV 1946	A	10000	36	Black and White 8.25 x 7.5	NMR
RAF/CPE/UK/1821	501	RP	3197	P	ST 861 525	17	04 NOV 1946	A	10000	36	Black and White 8.25 x 7.5	NMR
RAF/CPE/UK/1821	501	V	5198	P	ST 868 546	30	04 NOV 1946	A	10000	36	Black and White 8.25 x 7.5	NMR
RAF/CPE/UK/1821	501	V	5199	P	ST 863 545	30	04 NOV 1946	A	10000	36	Black and White 8.25 x 7.5	NMR
RAF/58/3021	2300	F22	197	P	ST 864 535	10	14 JUL 1959	AC	10200	20	Black and White 8.25 x 7.5	NMR
RAF/58/3021	2300	F22	198	P	ST 870 534	10	14 JUL 1959	AC	10200	20	Black and White 8.25 x 7.5	NMR
RAF/543/3860	2340	F21	657	N	ST 870 529	4	13 JUN 1967	A	10600	36	Black and White 9 x 9	NMR
RAF/543/3860	2340	F21	658	N	ST 865 530	4	13 JUN 1967	A	10600	36	Black and White 9 x 9	NMR
RAF/106G/UK/427	3647	FS	2024	P	ST 865 527	11	22 JUN 1945	A	10500	8	Black and White 5 x 5	NMR
RAF/106G/UK/427	3647	FS	2025	P	ST 863 532	11	22 JUN 1945	A	10500	8	Black and White 5 x 5	NMR
RAF/106G/UK/427	3647	FS	2026	P	ST 862 536	11	22 JUN 1945	A	10500	8	Black and White 5 x 5	NMR
RAF/106G/LA/292	3706	RS	4022	P	ST 858 535	5	12 MAY 1945	A	10000	20	Black and White 8.25 x 7.5	NMR
RAF/106G/LA/292	3706	RS	4023	P	ST 859 530	5	12 MAY 1945	A	10000	20	Black and White 8.25 x 7.5	NMR
RAF/106G/LA/292	3706	RS	4051	P	ST 868 529	6	12 MAY 1945	A	10000	20	Black and White 8.25 x 7.5	NMR
RAF/106G/LA/292	3706	RS	4052	P	ST 867 537	6	12 MAY 1945	A	10000	20	Black and White 8.25 x 7.5	NMR
RAF/106G/LA/268	3728	RS	4044	P	ST 872 529	4	10 MAY 1945	A	10200	20	Black and White 8.25 x 7.5	NMR
RAF/106G/LA/268	3728	RS	4045	P	ST 867 529	4	10 MAY 1945	A	10200	20	Black and White 8.25 x 7.5	NMR
RAF/106G/LA/268	3728	RS	4046	P	ST 862 528	4	10 MAY 1945	A	10200	20	Black and White 8.25 x 7.5	NMR
RAF/58/1877	3860	F21	119	N	ST 865 535	2	29 SEP 1955	AC	15000	20	Black and White 8.25 x 7.5	NMR
RAF/58/1877	3860	F21	120	N	ST 854 535	2	29 SEP 1955	AC	15000	20	Black and White 8.25 x 7.5	NMR
RAF/58/1877	3860	F22	180	P	ST 865 520	9	29 SEP 1955	AC	15000	20	Black and White 8.25 x 7.5	NMR
RAF/58/1877	3860	F22	181	P	ST 856 519	9	29 SEP 1955	AC	15000	20	Black and White 8.25 x 7.5	NMR
RAF/58/1882	3866	F21	100	N	ST 869 525	2	01 OCT 1955	A	15000	20	Black and White 8.25 x 7.5	NMR
RAF/58/1882	3866	F21	101	N	ST 858 523	2	01 OCT 1955	A	15000	20	Black and White 8.25 x 7.5	NMR
OS/63084	11489	V	16	P	ST 863 529	1	02 JUN 1963	A	7500	12	Black and White 9 x 9	NMR
OS/63084	11489	V	17	P	ST 865 535	1	02 JUN 1963	A	7500	12	Black and White 9 x 9	NMR
FSL/71215	12521	V	215097	P	ST 870 523	3	08 SEP 1971	A	12000	6	Black and White 9 x 9	HES
FSL/71215	12521	V	215098	P	ST 870 533	3	08 SEP 1971	A	12000	6	Black and White 9 x 9	HES
OS/90157	13723	V	95	P	ST 859 530	4	13 JUL 1990	A	7700	12	Black and White 9 x 9	NMR
OS/90157	13723	V	96	P	ST 865 530	4	13 JUL 1990	A	7700	12	Black and White 9 x 9	NMR
OS/90157	13723	V	97	P	ST 871 530	4	13 JUL 1990	A	7700	12	Black and White 9 x 9	NMR
OS/95713	14992	V	171	P	ST 869 531	7	15 AUG 1995	A	8000	12	Black and White 9 x 9	NMR
OS/95713	14992	V	172	P	ST 862 531	7	15 AUG 1995	A	8000	12	Black and White 9 x 9	NMR
OS/98516	15292	V	15	P	ST 859 534	1	02 MAY 1998	A	8100	12	Black and White 9 x 9	NMR
OS/98516	15292	V	16	P	ST 864 534	1	02 MAY 1998	A	8100	12	Black and White 9 x 9	NMR
OS/98516	15292	V	17	P	ST 869 534	1	02 MAY 1998	A	8100	12	Black and White 9 x 9	NMR
OS/00977	15745	V	869	N	ST 868 531	3	14 MAY 2000	A	7500	6	Black and White 9 x 9	NMR
OS/00977	15745	V	870	N	ST 868 538	3	14 MAY 2000	A	7500	6	Black and White 9 x 9	NMR
OS/00977	15745	V	891	N	ST 855 537	4	14 MAY 2000	A	7500	6	Black and White 9 x 9	NMR
OS/00977	15745	V	892	N	ST 856 531	4	14 MAY 2000	A	7500	6	Black and White 9 x 9	NMR
OS/02656	23993	V	33	N	ST 871 535	2	30 SEP 2002	A	5500	12	Colour 9 x 9	NMR
OS/02656	23993	V	34	N	ST 871 530	2	30 SEP 2002	A	5500	12	Colour 9 x 9	NMR
OS/02656	23993	V	60	N	ST 862 538	4	30 SEP 2002	A	5500	12	Colour 9 x 9	NMR
OS/02656	23993	V	61	N	ST 862 533	4	30 SEP 2002	A	5500	12	Colour 9 x 9	NMR
OS/02656	23993	V	62	N	ST 862 529	4	30 SEP 2002	A	5500	12	Colour 9 x 9	NMR
OS/05906(Y)	24648	V	4243	N	ST 873 534	6	30 AUG 2005	A	10000	6	Colour 9 x 9	NMR
OS/05906(Y)	24648	V	4244	N	ST 863 534	6	30 AUG 2005	A	10000	6	Colour 9 x 9	NMR
									Total Sorties		17	
									Total Frames		51	

Customer oblique listing - Obliques, Standard Order									
Customer enquiry reference number: 152311									
Photo reference (NGR and Index number)	Film and frame number	Original number	Date	Film type	Map Reference (6 figure grid ref)	What can you order?			
						Photocopy	Laser copy	Photographic copy	Digital copy
ST 8552 / 2	NMR 15719 / 27		25 SEP 1997	Colour neg 35 mm	ST 857528	Y	Y	Y	U
ST 8552 / 3	NMR 15838 / 15		25 SEP 1997	Black & white 70mm,120,220	ST 856528	Y	Y	Y	U
ST 8552 / 4	NMR 15806 / 19		25 SEP 1997	Colour slide 35 mm	ST 857528	Y	Y	Y	U
ST 8552 / 6	NMR 27664 / 27		19 APR 2013	Digital colour 35 mm	ST 856529	Y	Y	Y	U
ST 8552 / 7	NMR 27664 / 28		19 APR 2013	Digital colour 35 mm	ST 856528	Y	Y	Y	U
ST 8552 / 8	NMR 27664 / 29		19 APR 2013	Digital colour 35 mm	ST 856528	Y	Y	Y	U
ST 8552 / 9	NMR 27664 / 30		19 APR 2013	Digital colour 35 mm	ST 856528	Y	Y	Y	U
ST 8552 / 10	NMR 27664 / 31		19 APR 2013	Digital colour 35 mm	ST 856528	Y	Y	Y	U
ST 8552 / 11	NMR 27664 / 32		19 APR 2013	Digital colour 35 mm	ST 856528	Y	Y	Y	U
ST 8552 / 12	NMR 27664 / 33		19 APR 2013	Digital colour 35 mm	ST 856528	Y	Y	Y	U
ST 8652 / 1	CCC 5232 / 3991	APR829	1930s	Black & white SF or I Neg	ST 867528	Y	Y	Y	U
ST 8652 / 2	CCC 5232 / 3992	APR829	1930s	Black & white SF or I Neg	ST 868527	Y	Y	Y	U
ST 8652 / 3	CCC 5232 / 3993	APR829	1930s	Black & white SF or I Neg	ST 867525	Y	Y	Y	U
ST 8652 / 4	CCC 5232 / 3994	APR829	1930s	Black & white SF or I Neg	ST 865523	Y	Y	Y	U
ST 8653 / 1	NMR 18169 / 01		12 OCT 1998	Black & white 70mm,120,220	ST 866534	Y	Y	Y	U
ST 8653 / 2	NMR 18145 / 17		12 OCT 1998	Colour slide 35 mm	ST 866534	Y	Y	Y	U
ST 8653 / 3	NMR 18145 / 18		12 OCT 1998	Colour slide 35 mm	ST 866534	Y	Y	Y	U
ST 8752 / 2	HEA 33787 / 028		17 JAN 2019	Digital colour 35 mm	ST 873528	Y	Y	Y	U
Total 18 records									

