

Heritage Statement.

Land west of Semington Road, Melksham.

On behalf of Bellway Strategic Land.

Date: 23/07/2026 | Pegasus Ref: P26-1582





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1. Introduction

- 1.1. Pegasus Group have been commissioned by Bellway Strategic Land to prepare a Heritage Statement to consider the proposed development at Land west of Semington Road, Melksham (hereafter the 'Site'), as shown on the Site Location Plan provided at **Plate 1**.
- 1.2. The Site is not located within a Conservation Area, nor are there any designated heritage assets located within the bounds of the Site. The Grade II Listed Berryfields Cottage is situated in proximity to the southern boundary of the Site.



Plate 1: Site Location Plan

- 1.3. Outline Planning Permission, with all matters reserved except for access, is sought for *"up to 225 dwellings, with access from Semington Road, along with public open space and landscape buffers to incorporate existing rights of way and to accommodate the route of the proposed Melksham Link Canal (under separate application W/12/01080/FUL). Demolition and clearance of all existing buildings and structures on the site."*
- 1.4. This Assessment provides information with regards to the significance of the historic environment to fulfil the requirement given in paragraph 207 of the Government's *National Planning Policy Framework* (the *NPPF*) which requires:
"...an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting".¹
- 1.5. In order to inform an assessment of the acceptability of the scheme in relation to impacts on the historic environment, following paragraphs 212 to 215 of the *NPPF*, any harm to the historic environment resulting from the proposed development is also described, including impacts on significance through changes to setting.
- 1.6. As required by paragraph 207 of the *NPPF*, the detail and assessment in this Report is considered to be *"proportionate to the assets' importance".²*

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

² MHCLG, *NPPF*, para. 207.

2. Site Description and Planning History

Site Description

- 2.1. The Site, c.11 hectares (ha) in size, comprises four agricultural fields, divided internally by hedgerows and fencing, and two modern farm complexes (**Plate 2** to **Plate 9**).
- 2.2. The Site is situated to the west of Semington Road, which extends southwards from the Melksham Ring Road (the A350) with modern residential development located on the road's eastern side and smaller residential properties on its western side, adjacent to the Site's southeastern boundary.
- 2.3. Land to the north is currently under construction for residential use, which on completion will connect the northern boundary of the Site with the southern extent of Melksham, to the south of the A350.
- 2.4. Agricultural land borders the Site to the south, beyond which lies further residential development.
- 2.5. The western boundary of the Site is formed by Berryfield Lane, with Westward Cottage located adjacent to the southwestern edge of the Site.



Plate 2: 2026 satellite imagery of the Site (red) (Source: Google Earth).



Plate 3: View south across the eastern field of the Site.



Plate 4: View east across the northern field of the Site with modern residential development along Semington Road visible.



Plate 5: View northeast across the northern field of the Site towards the residential development under construction immediately north of the Site.



Plate 6: View towards the former farmyard/piggery from the western boundary of the Site.



Plate 7: The former farmyard/piggery.



Plate 8: View, facing east, of the former chicken sheds.



Plate 9: View southwest across southern field of the Site.

The Site

- [illegible]

Plate 10: Annotated extract from the proposed Layout Plan associated with Application Ref. W/12/01080/FUL (Dwg. No. WBCT/10/003_R4) with boundary of the Site which is the subject of this report shown in blue.

- 2.7. The application remains undetermined; however, the Masterplan proposed under this application has been designed to respond to the new waterway, incorporating the canal and its associated access within the overall design of the scheme (see **Section 3**).
- 2.8. Archaeological works undertaken in support of Application Ref. W/12/O1080/FUL are discussed in **Section 6** where relevant.

Relevant Applications within the Surrounds of the Site

- 2.9. The following approved planning applications relate to the residential redevelopment of land to the north and east of the Site for which development has either commenced or been completed.
- LPA Ref. **PL/2024/11665**: *Application for reserved matters pursuant to application ref: PL/2022/08155 for appearance, scale, layout and landscaping.*
 - LPA Ref. **PL/23/00808**: *Approval of reserved matters following Outline application 20/07334/OUT approved under Appeal ref APP/Y3940/W/21/3285428 for up to 50 dwellings, (appearance, scale, layout and landscaping)*
 - LPA Ref. **PL/2022/08155**: *Outline planning permission for up to 53 dwellings including formation of access and associated works, with all other matters reserved*

- LPA Ref. **20/07334/OUT**: *Outline planning permission for up to 50 dwellings and formation of access and associated works (Outline application to consider access with all other matters reserved).*
- LPA Ref. **16/00497/OUT**: *Development of 150 Dwellings with Associated Access, Infrastructure, Parking, Landscaping and Local Equipped Area of Play. Following Outline Permission.*
- LPA Ref. **16/05717/OUT**: *Erection of two new dwellings with access.*

2.10. Additionally, the following live application relates to the development of land to the south of the Site:

- LPA. Ref. **PL/2025/00626**: Outline planning application for up to 58 dwellings and formation of

new access and associated works (All matters reserved other than access).

2.11. Within the Officer Reports and recommendations associated with the above applications the potential for archaeological remains was not recognised as a potential constraint to development, and no built heritage assets were raised as a potential issue within the surrounds of the Site.

2.12. As set out above, the surroundings of the Site are subject to a number of recent and live planning applications, which will (or already have) materially change the character of the wider area surrounding the Site. This pattern of development clearly identifies the area as one which has been recognised as suitable for residential development.

3. Proposed Development

- 3.1. Outline Planning Permission, with all matters reserved except for access, is sought for “*up to 225 dwellings, with access from Semington Road, along with public open space and landscape buffers to incorporate existing rights of way and to accommodate the route of the proposed Melksham Link Canal (under separate application W/12/O1080/FUL). Demolition and clearance of all existing buildings and structures on the site.*”
- 3.2. ‘For approval’ plans associated with the application comprise:
- Site Location Plan (Dwg. No. P25-0016_SLP-01_REVB);
 - Land Use and Access Parameter Plan (Dwg. No. P25-0016_PARP-01_REVB);
 - Building Heights Parameter Plans (Dwg. No. P25-0016_PARP-02_REVA);
 - Green Infrastructure Parameter Plan (Dwg. No. P25-0016_PARP-03_REVA).
 - Demolition Parameter Plan (Dwg. No. P25-0016_PARP-04 RevA).
- 3.3. The Parameter Plans, which are supplemented by the Illustrative Masterplan (**Plate 11**), demonstrating how the Site could be developed to achieve the quantum of housing, open space, ecological mitigation and supporting infrastructure proposed.

- 3.4. The Parameter Plans secure the following design measures which directly respond to the consideration of the historic environment:
- Setback of development along the southern edge of the Site, closest to Berryfields Cottages.
 - Additional proposed planting along the southern boundary and within the southwestern corner.
- 3.5. **Section 7** of this Report presents an analysis of the impact of the proposed development on identified heritage assets.



Plate 11: Extract from the Illustrative Masterplan as included within the Design and Access Statement.

4. Methodology

- 4.1. The aims of this Report are to assess the significance of the heritage resource within the Site/study area, to assess any contribution that the Site makes to the heritage significance of the identified heritage assets, and to identify any harm or benefit to them which may result from the implementation of the development proposals, along with the level of any harm caused, if relevant.
- 4.2. This assessment considers both the archaeological resource and built heritage.

Sources

- 4.3. The following key sources have been consulted as part of this assessment:
- The Wiltshire Historic Environment Record (HER) for information on the recorded heritage resource within the vicinity of the site;
 - The National Heritage List for England for information on designated heritage assets;
 - Historic maps available online;
 - Aerial photographs available online via Historic England's Aerial Photo Explorer and Britain from Above;
 - Historic England's Aerial Archaeology Mapping Explorer;

- The Wiltshire and Swindon History Centre online catalogue (NB: no sources of relevance to this assessment were identified); and
- Other online resources, including Ordnance Survey Open Source data; geological data available from the British Geological Survey and Cranfield University's Soilscales Viewer; Google Earth satellite imagery; and LiDAR data from the Environment Agency.

- 4.4. For digital datasets, information was sourced for a 1km study area measured from the boundaries of the Site. Information gathered is discussed within the text where it is of relevance to the potential heritage resource of the site. A gazetteer of recorded sites and findspots is included as **Appendix 1** and maps illustrating the resource and study area are included as **Appendix 2**.

- 4.5. Historic cartographic sources and aerial photographs were reviewed for the Site, and beyond this where professional judgement deemed necessary.
- 4.6. Heritage assets in the wider area were assessed as deemed appropriate (see **Section 7**).

Site Visit

- 4.7. Site visits were undertaken by Heritage Consultants from Pegasus Group on 3rd August 2022 and 7th July 2026, during which the Site and its surrounds were assessed.

Photographs

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

Assessment Methodology

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

- ClfA's *Standard and Guidance for Historic Environment Desk-Based Assessment*;³
- *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-*

Taking in the Historic Environment (hereafter GPA:2);⁴

- *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) – The Setting of Heritage Assets*, the key guidance of assessing setting (hereafter GPA:3);⁵
- *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (hereafter HEAN:12);⁶ and
- *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*.⁷

³ Chartered Institute for Archaeologists (ClfA), *Standard and Guidance for Historic Environment Desk-Based Assessment* (revised edition, October 2020).

⁴ Historic England, *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment* (GPA:2) (2nd edition, Swindon, July 2015).

⁵ Historic England, *Historic Environment Good Practice Advice in Planning Note 3 – The Setting of Heritage Assets* (GPA:3) (2nd edition, Swindon, December 2017).

⁶ Historic England, *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (HEAN:12) (Swindon, October 2019).

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

5. Policy Framework

Legislation

- 5.1. Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and their settings and Conservation Areas.⁸
- 5.2. In addition to the statutory obligations set out within the aforementioned Act, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, are determined in accordance with the Development Plan unless material considerations indicate otherwise.⁹
- 5.3. Full details of the relevant legislation are provided in **Appendix 4**.

National Planning Policy Guidance

- 5.4. National Planning Policy guidance relating to the historic environment is provided within Section 16 of the Government's *National Planning Policy Framework* (NPPF), an updated version of which was published in December 2024. The NPPF is also supplemented by the national *Planning Policy Guidance* (PPG) which comprises a full

and consolidated review of planning practice guidance documents to be read alongside the NPPF and which contains a section related to the Historic Environment.¹⁰ The PPG also contains the *National Design Guide*.¹¹

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

The Development Plan

- 5.6. Planning applications within Wiltshire are currently considered against the policy and guidance set out in the Wiltshire Core Strategy (adopted 20th January 2015) and the Joint Melksham Neighbourhood Plan 2 2020-2038 (adopted August 4th 2025).
- 5.7. Details of the policy specific relevant to the application proposals are provided within **Appendix 6**.

⁸ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

⁹ UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

¹⁰ Ministry of Housing, Communities & Local Government (MHCLG), *Planning Practice Guidance: Historic Environment* (PPG) (revised edition, 14th February 2024), <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>.

¹¹ Ministry of Housing, Communities & Local Government (MHCLG), *National Design Guide* (London, January 2021).

6. Archaeological Baseline

- 6.1. This Section provides a review of the recorded heritage resource within the Site and its vicinity in order to identify any extant heritage assets within the site and to assess the potential for below-ground archaeological remains.
- 6.2. Designated heritage assets are referenced using their seven-digit NHLE number, HER 'event' numbers have the prefix EWI and HER 'monument' numbers have the prefix MWI.
- 6.3. A gazetteer of relevant heritage data is included as **Appendix 1**. Designated heritage assets and HER records are illustrated on **Figures 1-3** in **Appendix 2**.

Previous Archaeological Works

The Site

- 6.4. Archaeological works – comprising a Geophysical Survey (EWI7855) and Trial Trench Evaluation (EWI8775) – were undertaken in 2015 with aspects of the Site which fall within the redline associated with the proposed Melksham Link Canal 2015 application (see **Plate 12**).
- 6.5. Anomalies recorded during the geophysical survey, associated with possible archaeological activity, were concentrated within the northern part of the Site, referred to as 'Area 10'.

- 6.6. Overall, the trial trench evaluation determined that ditch features identified within Area 10 were most likely of a Romano-British date. These features are recorded on the Wiltshire HER (MWI75668). No other archaeological features or finds were identified within the Site.
- 6.7. The results of 2015 investigations are discussed below, where relevant to the potential archaeological resource of the Site.



6.8.

Plate 12: Annotated extract from the geophysical survey report for the canal with the current Site redline boundary overlaid (Archaeological Surveys, 2015).

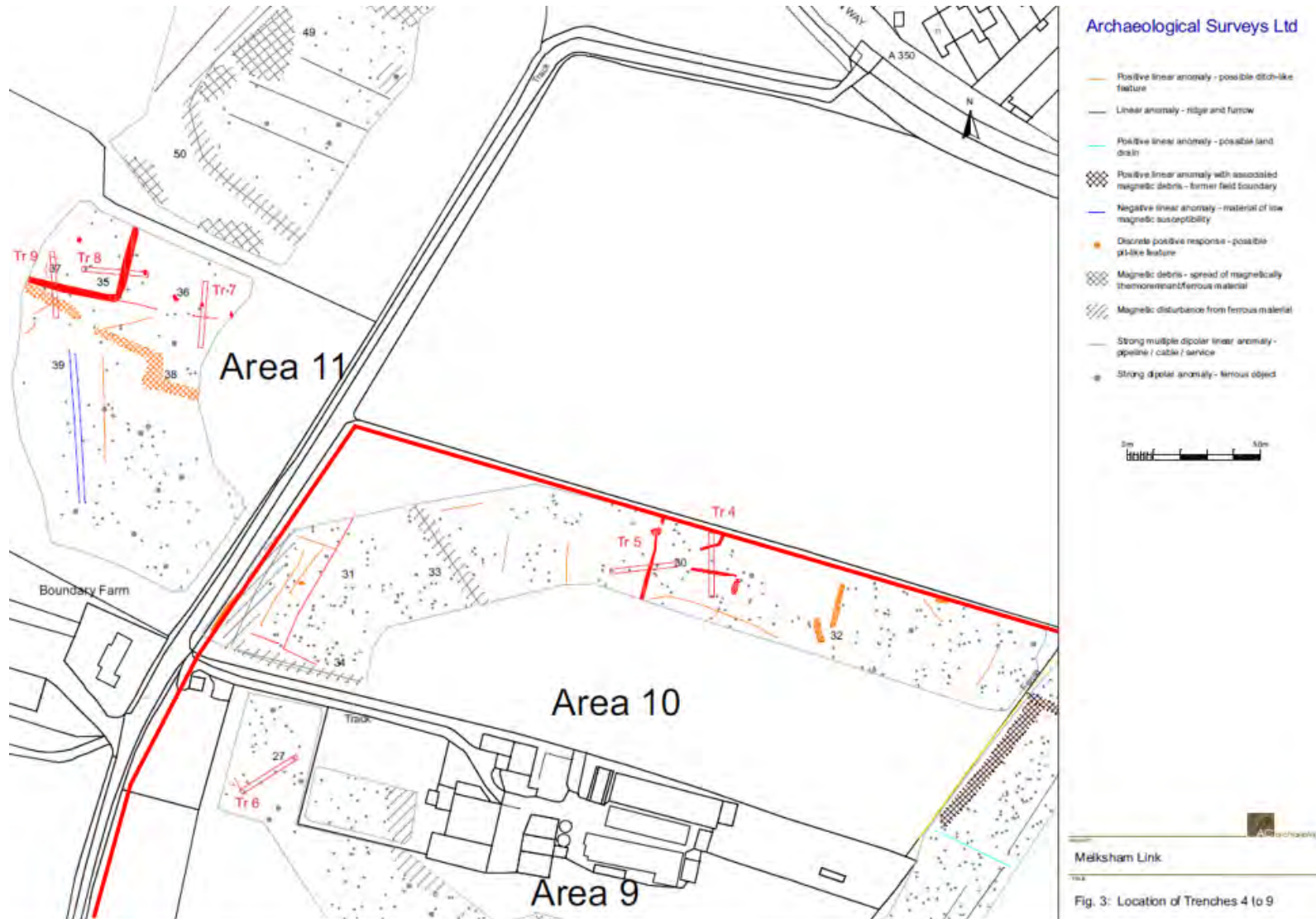


Plate 13: Annotated extract from the trench for the Melksham Link Canal application showing the location of the trenches excavated within the Site. The current Site redline boundary overlaid (Archaeological Surveys, 2015).

Relevant Archaeological Works within the Wider Surrounds of the Site

- 6.9. Areas immediately north, east, south, and west of the Site have been subject to phases of archaeological investigations included geophysical survey, trial trench evaluation and watching briefs.¹²
- 6.10. Overall, the results of these works indicate predominantly prehistoric and Romano-British activity within the surrounds of the Site. To the east, Bronze Age and Iron Age postholes, pits and gullies indicate occupation activity. There is no suggestion this extends into the Site. A Roman-period field system to the south and a probable Roman pit to the north suggest a continued agricultural landscape into the Romano-British period.
- 6.11. Post-medieval field boundaries and furrows recorded to the north and south reflect the agricultural character of the Site and its surrounds during these periods.
- 6.12. The results of these works are discussed below, where relevant to the potential archaeological resource of the Site.

Topography and Geology

- 6.13. The topography of the Site is predominantly flat, with a gentle slope from 39m above Ordnance Datum (aOD) in the north of the site to 38m aOD in the south of the Site.

- 6.14. The mapped geology of the Site comprises Kellaways Formation-Sandy mudstone in the north of the Site and Cornbrash Formation-Limestone within the southern part of the Site.¹³
- 6.15. The mapped geology of the Site comprises Oxford Clay Formation. This is a sedimentary mudstone shallow-marine in origin formed between 166,100,000 and 157,300,000 years ago during the Jurassic period.
- 6.16. No superficial deposits are mapped within the Site.
- 6.17. The recorded soils of the Site are freely draining lime-rich loamy soils.¹⁴

Archaeological Baseline

Prehistoric (pre-43 AD)

- 6.18. There are no HER entries indicative of prehistoric activity recorded within the Site. Archaeological investigations undertaken within the Site to date have not identified any evidence of prehistoric activity.
- 6.19. A possible Bronze Age barrow cemetery, comprising seven levelled round barrows, is recorded on the HER

¹² HER Refs. EWI9102; EWI9193; EWI10691; EWI10873 EWI7644; EWI7645; EWI9496; EWI11526

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

¹⁴ Cranfield University, *Soilscapes*, <http://www.landis.org.uk/soilscapes/>.

c.200m northwest of the Site¹⁵, with a further six possible barrows recorded c.800m northwest of the Site (MWI1918). The possible barrow cemetery in closest proximity to the Site was identified via the analysis of cropmarks visible on aerial photographs. None of the barrows, or the recorded extent of the cemetery, have been subject to geophysical survey or intrusive archaeological investigations.

- 6.20. Several phases of archaeological works, comprising geophysical surveys, a watching brief, and evaluations have been undertaken in the area between the Site and the possible barrow cemetery.¹⁶ Based upon the results of these works there is no indication that the barrow cemetery extends towards the Site.
- 6.21. An area of evaluation (EWI8775) associated with the proposed Melksham Link Canal, c.100m northwest of the Site, identified postholes, ditches, and a probable Late Neolithic/Early Bronze Age enclosure but did not identify activity associated with the possible barrow cemetery.
- 6.22. A probable Iron Age, or possibly later Romano-British, enclosure was also identified via analysis of aerial photographs within the location of the barrow cemetery (MWI1924), c.170m northwest of the Site at its nearest point.
- 6.23. There are a further 17 entries for pits and ditches of prehistoric date, with the nearest to the Site located c.110m east, where late Bronze Age ditches and middle

Bronze Age to early Iron Age pits were identified during archaeological works (EWI7644 and EWI7645)

- 6.24. Remaining prehistoric activity recorded on the HER is more distanced from the Site, and comprises palaeochannels (MWI1372), c.940m northwest of the Site, and findspots, the closest of which is a Bronze Age axe head, found c.670m south of the Site (MWI4926).
- 6.25. Overall, based on the findings of archaeological works within the Site and its surrounds it is considered that there is a low – moderate potential for prehistoric remains within the Site.

Romano-British (AD 43 – 410)

- 6.26. Trial trench evaluation associated with the proposed Melksham Link Canal identified Romano-British ditches within the far northern part of the Site (MWI75668). The 2015 geophysical survey (EWI7855) did not identify any further evidence of possible Romano-British activity.
- 6.27. A geophysical survey (EWI10691) and subsequent trial trench evaluation (EWI10873) of land immediately to the south of the Site identified evidence of several Romano-British ditches (MWI79063), interpreted as truncated elements of a wider field system.¹⁷ The alignment of the recorded ditches indicates that they may extend into the Site. Set within the context of wider Romano-British agricultural activity, with further ditches recorded within the northern part of the Site, as well as to the south, any

¹⁵ HER Refs. MWI1919; MWI1920; MWI1921; MWI1922; MWI1923; MWI73490; MWI73491; MWI75770

¹⁶ HER Refs. EWI11526; EWI7890; EWI7896; EWI8775; and EWI7855.

¹⁷ AC Archaeology, Land at Berryfield Lane, Melksham (2024).

ditches extending into the Site are considered unlikely to be of more than local significance.

- 6.28. The majority of the remaining Romano-British entries recorded on the HER within the 1km study area are located c.750m north of the Site, where Romano-British settlement activity has been identified at Melksham Campus.¹⁸
- 6.29. Overall, Romano-British remains have been identified both within the Site and in the surrounding area, primarily associated with agricultural activity. Any further features identified within the Site are therefore likely to relate to agricultural activity, with current evidence indicating a low potential for settlement activity of this date. On this basis, the potential for significant Romano-British remains within the Site is considered to be low.

Early Medieval (410 – 1066)

- 6.30. There are no HER entries indicative of early medieval activity recorded within the Site. Archaeological investigations undertaken within the Site to date have not identified any evidence of early medieval activity.
- 6.31. Within the wider surrounds of the Site early medieval activity is recorded in Melksham, comprising Sunken Feature Buildings (MWI78179) and a human cremation of which the remains were dated to AD 266–536, suggesting a likely Romano-British but possible early medieval origin (MWI78178). These were uncovered during excavations at Melksham Campus, as discussed

above, suggesting settlement activity extending from the Romano-British period and into the early medieval period.

- 6.32. On the basis of the lack of early medieval activity within the Site, and the paucity of such activity within the wider study area, likely confined to Melksham, the overall potential for early medieval activity within the Site is considered to be low.

Medieval (1066 – 1539)

- 6.33. There are two HER entries within the Site boundary indicative of medieval activity.
- 6.34. The site of the medieval settlement of Berryfields is recorded within the southwestern portion of the Site (MWI1875), with it cited in the HER that evidence for this comes from a 20th-century study of the place names of Wiltshire.¹⁹ There is no above ground evidence of the settlement at the location it is recorded on the HER. The geophysical survey (EWI7896) of the field to the south of the Site for which the settlement is recorded as extending into, found no below ground evidence of the settlement. This may also be the case for that part of the HER entry which is located within the Site. Overall, it is not clear from the HER entry why the settlement is recorded in this precise area.
- 6.35. Ridge and furrow earthworks are recorded on the HER in the eastern parcel of the Site (MWI73892). The HER records these as being of medieval or post-medieval date; whilst the earthworks may therefore have medieval

¹⁸ HER Refs: MWI76759; MWI78174; MWI78175; MWI78176; MWI78177; MWI78178; MWI78179

¹⁹ Monograph: Gover, J. E. B. + Mawer, A. + Stenton, F. M.. English Place Name Society: *The Place Names of Wiltshire*. Cambridge University Press. (1939), p.129

origins, it is equally possible that they are post-medieval in date. On-site assessment confirmed that ridge and furrow earthworks are extant within this part of the Site, albeit they are heavily eroded.

- 6.36. There are a further 65 entries within the 1km study area associated medieval agricultural activity, including 57 entries for ridge and furrow earthworks. The closest of these to the Site is an area of former ridge and furrow c.10m south of the Site (MWI73892).
- 6.37. Melksham (MWI4938) is recorded in the Domesday Survey of 1086 AD as comprising 234 households and possessing a church and eight mills. Its population puts it in the largest 20% of settlements recorded in the Survey and strongly indicates Saxon (or earlier) origins. The evidence of possible medieval ridge and furrow within the Site would suggest that during the medieval period the Site formed part of the wider agricultural hinterland to the south of Melksham. In this regard, the former farmstead at Townsend Farm, c.30m northeast of the Site, is identified by the HER as having medieval origins (MWI3632). The farmstead has since been converted to residential units and is physically separated from the Site by modern built form.
- 6.38. Overall, whilst ridge and furrow earthworks have been identified within the Site, such remains would typically retain insufficient archaeological and historic interest to be of anything greater than local significance, especially when taking into account the level of erosion which has occurred, and this significance would apply to the system of earthworks across the parish as a whole.
- 6.39. Medieval activity associated with the recorded location of Berryfields is located within the Site. No above ground

remains have been identified and archaeological works, undertaken within the southern extent of the recorded location of the settlement (to the south of the Site) did not identify any below ground remains. Overall, there is no current evidence which can confirm that the HER entry correctly denotes the location of the potential medieval settlement.

- 6.40. Based upon the above, the potential for significant medieval remains within the Site is considered to be low to moderate.

Post-medieval (1540 – 1901)

- 6.41. There are no HER entries indicative of a post-medieval date recorded within the Site.
- 6.42. The earliest source identified as part of this assessment to depict the Site in detail is the 1838 Tithe Map of the Parish of Melksham (**Plate 14**). At this date the Site comprised four agricultural fields, in mixed pastoral and arable use, forming the wider hinterland to the south of Melksham. The accompanying Tithe Apportionment records that all plots within the Site were under different ownership and occupation (see **Table 1**). The land parcels were associated with four different farms, two of which were located within the parish of Melksham. Of the farms in the parish, the fields in the Site formed one part of larger sets of landholdings and the farmsteads were distanced from the Site.

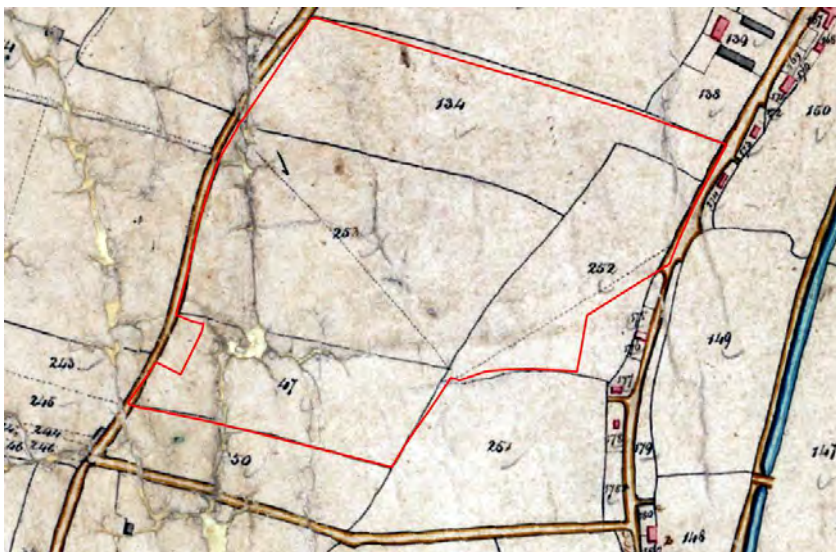


Plate 14: Extract from the 1838 Tithe Map of Melksham showing the approximate location of the site in red (Image courtesy of Know Your Place).

Table 1: Summary of Tithe Apportionments for the Site.

Plot Number	Owner	Occupier	Plot name	Use
47	Walter Long Esquire	Thomas Miles	Long Furlong	Arable
134	Ambrose Awdry	James Breach	Seven Acres	Arable
252	Reverend William Bouchier Wrey	William Salter	Long Elms	Pasture
253	Reverend Jeremiah Awdry	James Cottle	Long Furlong or Ten Acres	Pasture

- 6.43. The Tithe Map demonstrates that the Site formed part of the wider agricultural hinterland of Melksham, and within the 1km study area 23 HER entries relate to post-medieval agricultural practices including farmsteads, agricultural buildings, and ridge and furrow earthworks. The closest of these to the Site comprise part of a system of post-medieval ridge and furrow earthworks immediately north of the Site, abutting the Site boundary (MWI73885).
- 6.44. Remaining HER entries within the wider study area are associated with entries denoting built form (both extant and no longer existing), with the closest to the Site associated with the ongoing occupation of Townsend Farm, as discussed above, and the establishment of Berryfields Cottages (MWI44520), c.50m southwest of the Site. Berryfields Cottages are Grade II Listed and discussed further in **Section 7**.
- 6.45. The former route of the Wiltshire and Berkshire canal is located c.120m east of the Site (MWI9472) (**Plate 15** and **Plate 16**).
- 6.46. Based on the above, the potential for significant post-medieval archaeological remains within the Site is considered to be low. Should any remains be identified within the Site they may include infilled plough furrows, boundaries, and drainage ditches. Such remains would typically retain insufficient archaeological and historic interest to be of anything greater than local significance should they be present.



Plate 15: Extract from the 1886 OS map with the approximate location of the Site in red (Image courtesy of National Library of Scotland (NLS)).



Plate 16: Extract from the 1900 OS map with the approximate location of the Site in red (Image courtesy of NLS).

Modern (1901 – present)

- 6.47. There is one HER entry for the modern period recorded within the Site which comprises a WWII camp (MWI7383), which forms one of four outlying subsidiary camps related to RAF Bowerhill (MWI4954), c.560m southeast of the Site. Five structures associated with the former army camp remain extant, albeit in a poor and altered state, with these discussed further in **Section 7**.
- 6.48. A further 29 recorded structures associated with the army camp are recorded on the Site as having been present within the Site.
- 6.49. Three concrete platforms – two of which are recorded on the HER and a further one identified during onsite assessment, were identified to the north of extant buildings (Buildings 2 and 3 in **Section 7**) and represent the foundations of three former blocks associated with the army camp. The former foundations do not illustrate anything beyond that already known regarding the location of WWII buildings and the fabric itself holds no intrinsic value. These foundations are thus not deemed of sufficient interest to warrant classification as non-designated heritage assets.
- 6.50. No evidence of potential below-ground remains relating to former buildings within the area of investigation were identified during the 2015 archaeological works within the Site.
- 6.51. Should any remains exist within the wider Site they would be unlikely to add materially to the existing understanding of the camp provided by the HER (i.e., the location of a former military camp), and the fabric itself would be of no intrinsic value. Thus, any potential below ground archaeological remains associated with the former army camp are not deemed to hold sufficient

interest to warrant classification as non-designated heritage assets.

- 6.52. Based on available evidence the army camp appears to have been disbanded between 1945 and 1975 (**Plate 17**). By 1975 poultry sheds had been established within the Site and within the wider surrounds, residential development along Berryfields Close, south of the Site, is also visible on the 1975 OS map (**Plate 18**).
- 6.53. By the early 21st-century the farmyard/piggery had been established within the Site, incorporating some of the former WWII buildings (**Plate 19**). Within the wider surrounds further residential development, established during the late 20th/early 21st century is visible to the east of the Site on aerial imagery (**Plate 20**). The aerial photographs illustrate the gradual extension of Melksham and the progressive absorption of the Site and its surrounds into the settlement. This process is ongoing, as evidenced by recently approved schemes in the surrounds of the Site, as outlined in **Section 2**, which continue to change the baseline context of the Site. As a result, the Site can no longer be considered to lie within an agricultural hinterland, but is now situated within a residential, developed context.
- 6.54. On this basis the potential for below ground remains from the modern period is considered low. Should any below ground remains survive they would likely be of local significance at most.



Plate 17: 1945 aerial photograph with the approximate location of the Site shown in red (NLS)

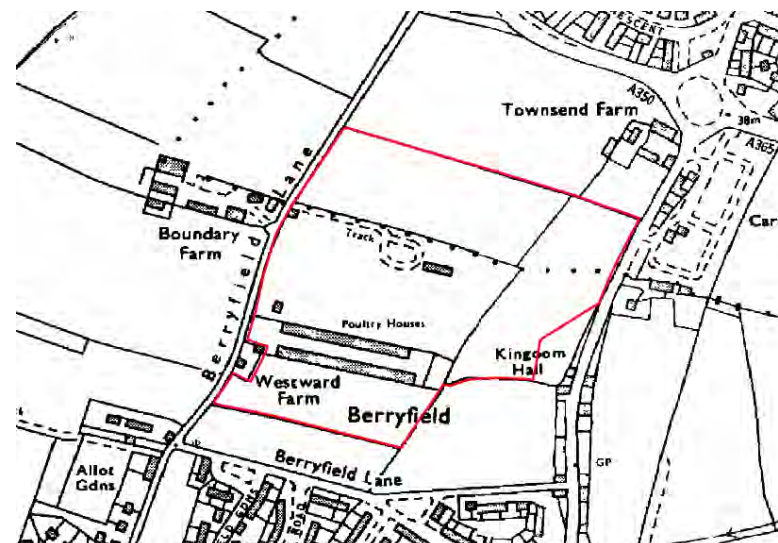


Plate 18: Extract from the 1975 OS map of the Site (red) (image courtesy of ProMap).



Plate 19: 2006 satellite imagery of the Site (red) (source: Google Earth).



Plate 20: 2026 satellite imagery of the Site (red) (source: Google Earth).

Statement of Archaeological Potential and Significance

- 6.55. No prehistoric features or finds are recorded within the Site on the HER. There is evidence of prehistoric activity within the wider surrounds, including a possible Bronze Age barrow Cemetery to the northwest of the Site. Based upon this and the findings of archaeological works undertaken within the Site and its surrounds, the archaeological potential for prehistoric remains within the Site is considered to be low – moderate.
- 6.56. Romano-British remains have been identified both within the Site and in the surrounding area, primarily associated with agricultural activity. Any further features identified within the Site are therefore likely to relate to agricultural activity, with a low potential for associated settlement activity. On this basis, the potential for significant Romano-British remains within the Site is considered to be low.
- 6.57. Ridge and furrow earthworks have been confirmed within the eastern parcel of the Site. Such remains would typically retain insufficient archaeological and historic interest to be of anything greater than local significance, especially when taking into account the level of erosion which has occurred. There is no current evidence to indicate that any below-ground remains associated with the possible site of the medieval settlement of Berryfields (MWI1875) have been accurately recorded, or, if they have, that any survive. Current evidence indicates that the potential for significant early medieval and medieval archaeological remains within the Site is therefore considered to be low to moderate.
- 6.58. There are no HER entries recording post-medieval activity within the Site. Should any below-ground remains be present, these are likely to comprise infilled plough furrows, boundaries, and drainage ditches associated with historic agricultural activity, and would typically retain insufficient archaeological and historic interest to be of anything greater than local significance.
- 6.59. A former WWII army camp is recorded within the Site (MWI7383). No evidence of potential below-ground remains relating to the camp were identified during archaeological works within the Site. Should any remains exist they would be unlikely to add materially to the existing understanding of the camp provided by the HER (i.e., the location of a former camp). On this basis the potential for below ground remains from the modern period is considered low. Should any below ground remains survive they would likely be of local significance at most.

7. The 'Built' and Wider Historic Environment

- 7.1. The following Section provides an assessment of elements of the built historic environment that have the potential to be sensitive to the proposed development.
- 7.2. There are no designated heritage assets situated within the bounds of the Site, nor is the Site located within a Conservation Area.
- 7.3. Five buildings associated with the former WWII army camp are situated within the northern part of the Site. A description of these buildings and their potential heritage significance is discussed further below.
- 7.4. With regards to heritage assets within the surrounds of the Site, Step 1 of the methodology recommended by the Historic England guidance *GPA:3* (see 'Methodology') is to identify which heritage assets might be affected by a proposed development.
- 7.5. Development proposals may adversely impact heritage assets where they remove a feature that contributes to the significance of a heritage asset or where they interfere with an element of a heritage asset's setting that contributes to its significance, such as interrupting a key relationship or a designed view.
- 7.6. Consideration, based upon professional judgement, on-site analysis, a review of archival sources and an understanding of the development proposals, was therefore made as to whether any of the built heritage assets present within the surrounding area may include the Site as part of their 'setting', whether the Site contributes to their overall heritage significance, and whether the assets may potentially be affected by the proposed scheme as a result.
- 7.7. The following designated heritage assets are located within 1km of the Site and shown on **Figure 1** in **Appendix 2**:
- Two Grade II* Listed buildings.
 - 74 Grade II Listed Buildings.
 - One Conservation Area.
- 7.8. It has been observed that only the following heritage asset has the potential to be sensitive to the development proposals and has thus been taken forward for detailed assessment below:
- Grade II Listed Berryfields Cottage (NHLE 1194671), c.30m southwest of the Site.
- 7.9. With regards to other designated heritage assets in the wider surrounds of the Site, assessment has concluded that the Site does not form any part of their 'setting' which positively contributes to their overall heritage significance due to the nature of the asset and a lack of visual connections, spatial relationships or historic connections. Accordingly, when taking into account this baseline context, alongside the nature of change that would occur, the proposed development is not anticipated to result in a change that would impact upon the overall heritage significance of any other heritage

asset within the surrounds of the Site, via a change in 'setting'.

Built Form within the Site

- 7.10. As discussed in **Section 6**, the Site was used as a military transit camp during WWII, with the HER providing a transcription of the location of WWII structures within the Site based upon an aerial photograph of 1946 (**Plate 21**). Assessment of existing built form within the Site identified that five buildings relate to the WWII army camp (**Plate 22**), one of which (Building 1) is not recorded on the HER.
- 7.11. **Table 2** provides an overview of the five buildings and their heritage significance.
- 7.12. Three concrete platforms were identified to the north of Buildings 2 and 3, one of which is not recorded on the HER, with these representing the footprint of three former blocks associated with the army camp. As discussed in **Section 6**, these in themselves are not considered to be of sufficient interest to warrant classification as non-designated heritage assets.
- 7.13. The remainder of the buildings within the Site comprise late 20th or early 21st century agricultural buildings of no heritage interest (**Plate 23** to **Plate 25**).



Plate 21: Extract from the Wiltshire HER detailing the location of WWII buildings as identified on a 1946 aerial photograph.



Plate 22: Location of retained WWII structures within the Site (blue).



Plate 23: Modern farm buildings within the Site.



Plate 25: Modern poultry sheds within the Site.



Plate 24: Complex of farm buildings, including WWII structures, as seen from the southwest.

Table 2: Summary of built form associated with the WWII camp within the Site.

Building No.	Description	Heritage Significance and Consideration During the Planning Process	Photographs
1	Building 1 comprises a single storey, brick structure, roughly square in plan, located in the northwest corner of the Site. Building 1 is not recorded on the Wiltshire HER; however, it is visible on a 1945 aerial photograph of the Site consulted as part of this assessment, with a 1930s / 1940s date supported by the fabric and design of the building (including the blast arrangement to the principal opening). Anecdotal evidence suggests that this was a guard post, and this possible use is supported by the overall architectural form and position of the building. The building is in a poor state of repair and internal access was not possible at the time of survey.	The building is of some local historic interest, with this derived from the contribution which it makes to the understanding of the presence and layout of the former WWII army camp. Nevertheless, the building is typical of an ancillary building constructed as part of a WWII military sites. It does not exhibit any features of notable interest, nor is it structurally innovative. The building is also in a poor condition. Thus, the building is not considered to be of any particular architectural interest. On balance the building holds only minor intrinsic heritage significance and is not deemed sufficient to warrant classification as a non-designated heritage asset.	

2	Buildings 2 comprises a single storey brick range, with a large brick 'tower' at the western end. Opaque Crittall style windows are present in the north and south elevations, with these thought to be original to the date of construction. The building has been to alteration in the post-War period, in particular by way of extension to the north and conversion into pig pens. Based upon its form, it is considered likely that the block comprised a 'wash house / shower block', with the western tower acting as a water tower. An alternative possible use is as a general accommodation or facilities block. No specific features of interest were identified internally.	Building 2 is considered to be of some historic interest, with this derived from the contribution which it makes to the understanding of the presence and layout of the former Army camp. Nevertheless, the building is a typical example of buildings constructed at military sites during WWII. It does not exhibit any features of notable interest, nor is it structurally innovative. Thus, the building is not considered to be of any particular architectural interest. On balance the building holds only minor intrinsic heritage significance and is not deemed sufficient to warrant classification as a non-designated heritage asset.	 
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3 & 4	Buildings 3 and 4 comprise two Stanton air raid shelters, which would have served the camp facilities in this location. The structures are constructed of precast, arched-shaped concrete units, with a brick and concrete entrance and brick emergency hatch. The structures are situated 'above ground' and would have historically been covered in earth and turf. Both structures appear to be in good condition. The structures are of a standard design, typical of WWII military sites, in particular those associated with the RAF.	The shelters are of some local historic interest, as tangible examples of the military use of the Site during WWII. Historic England guidance on military structures states that when considering the overall heritage significance of air-raid shelters <i>"Determinant factors will include rarity of type; relationship to other listed buildings; and significance of overall understanding of the development of the category."</i> Based upon this assessment criterion, and the type and form of the air-raid shelter, it is considered that although of interest the overall significance of the structures is low. The structures do not represent early examples, either nationally or locally, nor were any innovative design or notable architectural features identified during the site visit. They are also not 'complete', having had the earth and turf removed. Thus, the buildings are not considered to be of any particular architectural interest. On balance the buildings hold only minor intrinsic heritage significance and are not deemed sufficient to warrant classification as a non-designated heritage assets.	 
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5	Building 5 is similar in design to Building 2, comprising a single storey brick range, with a large brick 'tower' at the southern end. Opaque Crittal style windows are present on at least the west elevation, with these thought to be original to the date of construction. The building has been subject to alteration in the post-War period. The building was not subject to internal inspection. Based upon its form, it is considered likely that the block comprised a 'wash house / shower block', with the western tower acting as a water tower. An alternative possible use is as a general accommodation or facilities block.	Building 5 is considered to be of some historic interest, with this derived from the contribution which it makes to the understanding of the presence and layout of the former Army camp. Nevertheless, the building is a typical example of buildings constructed at military sites during WWII. It does not exhibit any features of notable interest, nor is it structurally innovative. Thus, the buildings is not considered to be of any particular architectural interest. On balance the building hold only minor intrinsic heritage significance and are not deemed sufficient to warrant classification as a non-designated heritage assets.	
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Assessment of Potential Impact

- 7.14. The proposed development will result in the total removal of the remnant WWII buildings.
- 7.15. As set out above, none of the buildings are considered to hold sufficient interest to warrant classification as non-designated heritage assets.
- 7.16. Should the Local Planning Authority take a different view, their loss would be a consideration under paragraph 216 of the *NPPF*²⁰, with their minor intrinsic value being a material consideration.
- 7.17. High Court Judgements have confirmed that when considering potential impacts on non-designated heritage assets within the decision-making process, the balanced judgement required is different from the public benefits exercise associated with designated heritage assets (as set out in Paragraphs 214 and 215 of the *NPPF*).²¹
- 7.18. Within a High Court Judgment of 2017, Jarman HHJ confirmed that the only requirement of the *NPPF* in respect of non-designated heritage assets is “*that the effect of an application on the significance should be taken into account*”.²²

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

[34] “Unsurprisingly, given that an NDHA [non-designated heritage asset] does not itself have statutory protection, the test in para 135 [Paragraph 216 of the 2024 NPPF] is different from that in paras 132–4 [Paragraphs 213–215 of the 2023 NPPF], which concern designated heritage assets. Paragraph 135 [Paragraph 216 of the 2024 NPPF] calls for weighing “applications” that affect an NDHA, in other words the consideration under that paragraph must be of the application as a whole, not merely the demolition but also the construction of the new building. It then requires a balanced judgement to be made by the decision maker. The NPPF does not seek to prescribe how that balance should be undertaken, or what weight should be given to any particular matter.”²³

²⁰ MHCLG, *NPPF*, para.216.

²¹ MHCLG, *NPPF*, paras. 214 and 215.

²² Travis Perkins (Properties) Limited v Westminster City Council [2017] EWHC 2738 (Admin), Paragraph 44.

²³ Bohm [2017] EWHC 3217 (Admin).

Grade II Listed Berryfields Cottage

- 7.20. Berryfields Cottages were added to the National List, at Grade II, on 13th February 1985 (NHLE 1194671). The List Entry provides the following description of the building:
- “Pair of cottages. Late C18 to early C19. Squared rubblestone, double Roman tiled roof with coped verges and ashlar stacks. 2 storey, 4-windows. Two planked doors have ashlar porches with ashlar gabled roof. Either side of each door is one 2-light beaded mullioned window with casements. First floor has four 2-light beaded mullioned windows. Two gabled attic dormers to roof. Returns are without windows. Rear has same 2-light beaded mullioned casement windows and No 612 has C19 brick outshot. Interior not inspected. Good example of stone late C18 artisan dwelling in unaltered condition.”*
- 7.21. The cottages are situated at the junction of Berryfields Close and Berryfields Lane, with their principal elevation fronting onto this route. Domestic gardens and landholdings are situated to the rear and side of the properties (**Plate 30**).
- 7.22. The earliest identified source depicting the cottages is the Tithe Map for the Parish of Melksham dated 1838 (**Plate 26**). This details that the two surviving cottages historically formed part of a larger range of buildings, much of which appears to be in use as a single farmstead based upon the information presented within the accompanying Apportionment.

- 7.23. The Apportionment details that the buildings were owned by the Duke of Somerset and tenanted by Robert White and there is no historic functional relationship to the Site (see **Table 1**).



Plate 26: Extract from the 1839 Tithe map showing the location of Berryfields Cottages (yellow). The Site is shown in red.

- 7.24. The 1887 OS map provides a more detailed depiction of Berryfields Cottages (**Plate 27**). By this date the building had been split into separate cottages with further built form, both dwellings and outbuildings, constructed in their immediate environs.
- 7.25. By the late 20th century there had been extensive development along Berryfields Close, partially enclosing the cottages to the south (**Plate 28**). During the late 20th/early 21st centuries further modern residential development was constructed to the south and to the east of the cottages allotment plots and associated outbuildings were also established (**Plate 29**).

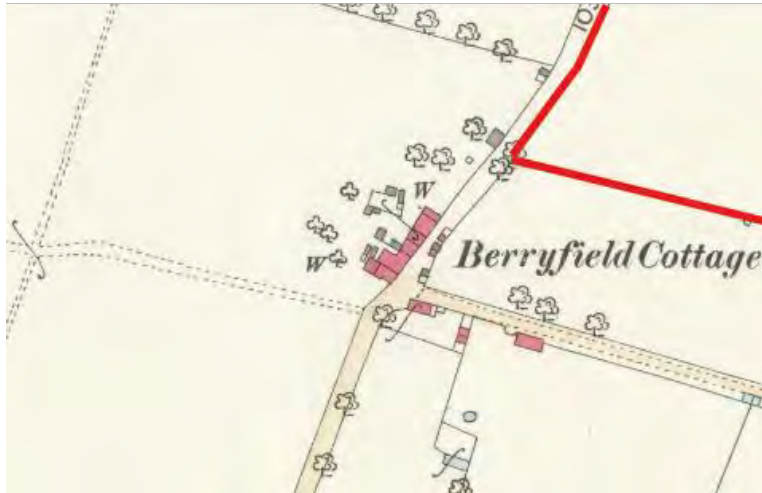


Plate 27: Extract from the 1886 OS map showing the cottages (image courtesy of NLS).



Plate 28: Extract from the 1973 OS map showing the cottages (image courtesy of NLS).



Plate 29: 2026 satellite imagery of Berryfields Cottages (yellow) (source: Google Earth).



Plate 30: Berryfields Cottages as seen from the junction of Berryfields Close and Berryfields Lane.

Statement of Significance

- 7.26. The heritage significance of Berryfields Cottages is principally associated with the architectural and historic interest of their physical fabric as good examples of late 18th-century artisan stone dwellings.
- 7.27. The 'setting' of Berryfields Cottages is also considered to contribute to its heritage significance; however, the significance derived from its 'setting' is considered to be less than associated with its physical fabric, as outlined above. Principal elements of the 'setting' of the asset which are considered to contribute to its overall heritage significance are as follows:
- The relationship between the cottages and their associated gardens.
 - The relationship between the cottages and Berryfields Close / Berryfields Lane.
 - The experience and appreciation of the assets from Berryfields Close / Berryfields Lane.
- 7.28. As discussed further below, the 'setting' of the asset primarily comprises the existing gardens, with it acknowledged that existing development has changed the original rural surrounds of the asset.

Contribution Made by the Site

- 7.29. The Site is located c.30m northeast of the asset. The Site is separated from the asset by Berryfields Lane and an agricultural field, the northern boundary of which is defined by mature vegetation which provides significant screening.

- 7.30. There is no historic functional or associative relationship between the asset and the Site.
- 7.31. Onsite assessment confirmed that there is some limited intervisibility between the asset and the southern field of the Site. This is limited due to intervening vegetation and the aforementioned field to the south of the Site which also provides a spatial separation between the two. It is recognised that onsite assessment was undertaken at a time of full leaf and that during the winter months a greater degree of intervisibility may be obtainable.
- 7.32. No co-visibility of the asset and the Site has been identified.
- 7.33. It is acknowledged that the Site forms part of the wider agricultural landscape of the asset. However, given the limited intervisibility between the Site and the asset, and the extent of change which has already occurred in the vicinity of the asset as a result of modern residential development, it is not considered that the Site forms an principal element of the asset's 'setting'.
- 7.34. Taking this into account, alongside the principal elements of the 'setting' of the asset identified above, it is concluded that the Site does not contribute, via setting, to the overall heritage significance of Berryfields Cottages.



Plate 31: View towards the Site from the eastern edge of the central field where the former poultry sheds are located.



Plate 32: View across the intervening agricultural field towards the Site, of which the southern boundary is defined by the mature vegetation.



Plate 33: View along Berryfields Lane towards the Site from outside the principal elevation of Berryfields Cottage.

Assessment of Potential Impact

- 7.35. The statutory requirement set out in Section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* confirms that special regard should be given to the preservation of the special historic and architectural interest of Listed Buildings and their 'settings'.
- 7.36. In addition, the *NPPF* states that the impact of development proposals should be considered against the particular significance of heritage assets, such as Listed Buildings, and this needs to be the primary consideration when determining the acceptability of the proposals.
- 7.37. It is also important to consider whether the proposals cause harm. If they do, then one must consider whether the harm represents "*substantial harm*" or "*less than substantial harm*" to the identified designated heritage

assets, in the context of paragraphs 214 and 215 of the NPPF.

7.38. The PPG clarifies that within each category of harm ("less than substantial" or "substantial"), the extent of the harm may vary and should be clearly articulated.

7.39. The guidance set out within the PPG also clarifies that "substantial harm" is a high test, and that it may not arise in many cases. It makes it clear that it is the degree of harm to the significance of the asset, rather than the scale of development, which is to be assessed.

7.40. When considering changes in 'setting' – as would be the case here – a recent Secretary of State Appeal Decision (henceforth referred to as the 'Edith Summerskill House Decision') has clearly set out that:

"In cases where the impact is on the setting of a designated heritage asset, it is only the significance that asset derives from its setting that is affected. All the significance embodied in the asset itself would remain intact. In such a case, unless the asset concerned derives a major proportion of its significance from its setting, then it is very difficult to see how an impact on its setting can advance a long way along the scale towards substantial harm to significance."²⁴ (our emphasis)

7.41. The Inspector for the 'Edith Summerskill House Decision' also provides the following narrative on substantial harm and the less than substantial harm 'spectrum':

"... substantial harm is set at a high bar, such that a good deal (or all) of the significance of a designated

***heritage asset would have to be removed for it to be reached. That means that the range for a finding of less than substantial harm is very wide indeed, from a harmful impact that is hardly material, to something just below that high bar.*"**²⁵

7.42. The proposed development would result in a change in character of the land to the northeast of Berryfields Cottages, from agricultural land to residential development. This change would be visible from the principal elevation of the asset, where it would be understood as a change within the wider landscape. It would also result in a change to views, where obtainable, towards the asset from within the southern field of the Site.

7.43. Where the proposed development may be visible from the first floor of the asset, such views are likely to comprise only the upper elements – such as upper windows and roofs – of development within the southern field of the Site.

7.44. Whilst the proposed development may result in views of built form from the asset where none currently exist, this visual change is mitigated by the setback of built form from the southern boundary, secured by the Parameters Plan, and the retention of the mature tree belt as a buffer, supplemented by additional planting to further screen views. These measures ensure that any resulting change in views would not be such as to diminish the ability to understand or appreciate the significance of the asset, which is principally derived from the contribution made by asset's immediate gardens and its relationship with

²⁴ APP/H5390/V/21/327713 [2023] – Edith Summerskill House, Clem Attlee Court, London, SW6 7TW, Paragraph 12.5 of main Decision.

²⁵ Ibid, Paragraph 12.4 of main Decision.

Berryfields Close / Berryfields Lane. The proposed development would not result in a change to these elements.

- 7.45. On this basis, the resulting change would not alter the understanding of the asset as 18th-century stone dwellings, or the important elements of its 'setting' as set out above.
- 7.46. Overall, it is concluded that the proposed development of the Site 'in-principle' would not result in harm to the overall heritage significance of Berryfields Cottage via a change in 'setting'.
- 7.47. It is also noted that a live planning application is currently under consideration for land immediately south of the Site (Application ref. PL/2025/00626). Should it be permitted and implemented the development proposed under Application ref. PL/2025/00626 would introduce a change to the character of the land situated between the Listed Building and the Site (see **Plate 34**).
- 7.48. In considering the Application ref. PL/2025/00626, the Conservation Officer has provided the following commentary:

"The application is an outline application for up to 68 dwellings, and an indicative site layout has been provided within the submitted information.

The site itself does not contain any heritage assets, yet just beyond the site boundary to the west is a pair of grade II listed buildings – these are the only designated heritage assets within the vicinity of the site.

At site allocation assessment stage, the Conservation Team commented that the setting of the grade II listed

buildings was more limited to existing garden areas and that the original rural surroundings have already been changed due to existing development. In relation to further impact caused by potential future development it was concluded that mitigation of impact could be achieved through careful and considered design. The layout provided shows the western end of the site dedicated to open green space, which would achieve a degree of preservation of setting, and is welcomed from a Conservation of the built environment point of view, as this should limit potential visual impact on the setting of the cottages" (our emphasis).



Plate 34: Annotated extract from the Illustrative Masterplan for the application to the south of the Site (PL/2025/00626). The Site boundary is shown in blue and Berryfields Cottages in Yellow.

8. Conclusions

- 8.1. Outline Planning Permission, with all matters reserved except for access, is sought for “*up to 225 dwellings, with access from Semington Road, along with public open space and landscape buffers to incorporate existing rights of way and to accommodate the route of the proposed Melksham Link Canal (under separate application W/12/O1080/FUL). Demolition and clearance of all existing buildings and structures on the site.*”
- 8.2. This Heritage Statement has considered both archaeology and built heritage.

Archaeology

- 8.3. No prehistoric features or finds are recorded within the Site on the HER. There is evidence of prehistoric activity within the wider surrounds, including a possible Bronze Age barrow Cemetery to the northwest of the Site. Based upon this and the findings of archaeological works undertaken within the Site and its surrounds, the archaeological potential for prehistoric remains within the Site is considered to be low – moderate.
- 8.4. Romano-British remains have been identified both within the Site and in the surrounding area, primarily associated with agricultural activity. Any further features identified within the Site are therefore likely to relate to agricultural activity, with a low potential for associated settlement activity. On this basis, the potential for significant Romano-British remains within the Site is considered to be low.

- 8.5. Medieval ridge and furrow earthworks have been confirmed within the eastern parcel of the Site. Such remains would typically retain insufficient archaeological and historic interest to be of anything greater than local significance, especially when taking into account the level of erosion which has occurred. There is no current evidence that any below ground remains associated with the possible site of the medieval settlement of Berryfields (MWI1875) survive. The potential for significant early medieval or medieval archaeological remains within the Site is therefore considered to be low to moderate.
- 8.6. There are no HER entries recording post-medieval activity within the Site. Should any below-ground remains be present, these are likely to comprise infilled plough furrows, boundaries, and drainage ditches associated with historic agricultural activity, and would typically retain insufficient archaeological and historic interest to be of anything greater than local significance.
- 8.7. A former WWII army camp is recorded within the Site (MWI7383). No evidence of potential below-ground remains relating to the camp were identified during archaeological works within the Site. Should any remains exist they would be unlikely to add materially to the existing understanding of the camp provided by the HER (i.e., the location of a former camp). On this basis the potential for below ground remains from the modern period is considered low. Should any below ground remains survive they would likely be of local significance at most.

- 8.8. In summary, current evidence indicates that the archaeological resource of the Site should not be considered a constraint to development.

The 'Built' and Wider Historic Environment

- 8.9. None of the built form within the Site associated with the WWII transit camp is considered to hold sufficient intrinsic heritage value to be regarded as a non-designated heritage assets. Should the Local Planning Authority take a different view, it is clear that the overall intrinsic significance of the buildings is minor, and their loss would be a consideration under paragraph 216 of the *NPPF*.
- 8.10. The only designated heritage asset within the wider surroundings of the Site identified as having the potential to be sensitive to the proposed development as a result of a change in 'setting' is the Grade II Listed Berryfields Cottages. Detailed assessment has concluded that no harm would arise to Berryfields Cottages as a result of the residential development of the Site 'in principle'.

Sources

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Historic England, <i>Statements of Heritage Significance: Analysing Significance in Heritage Assets</i> , Historic England Advice Note 12 (Swindon, October 2019).
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Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin).
Catesby Estates Ltd. V. Steer [2018] EWCA Civ 1697.
Jones v Mordue [2015] EWCA Civ 1243.
Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor [2020] EWHC 2292 (Admin).
Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061.
R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).

Appendix 1: Gazetteer

Heritage Data

HER Event Data

Ev UID	Name
EWI3242	Watching Brief at Melksham Sewage Treatment Works, South Brook Outfall
EWI6830	Watching Brief along the Holt to Semington Water Main Replacement
EWI8517	Evaluation on Melksham Link Canal
EWI9464	Watching Brief at Berryfield during Rising Main Replacement
EWI11047	Watching Brief During Construction of Bypass Bridge , Melksham
EWI11068	Architectural Survey of Air Raid Shelter, Cooper-Avon Sport and Social Club
EWI3253	Bore Hole Survey at the Hurn Site, Melksham
EWI5849	Archaeological Evaluation on the Route of the A350 Semington-Melksham Diversion
EWI6784	Gower House, 1 Place Road, Melksham
EWI6905	Archaeological Watching Brief on Land to the West of Sainsbury's Store, Bath Road, Melksham
EWI6906	Evaluation on Land to the West of Sainsbury's Store, Bath Road

EWI7370	Evaluation at National Spiritualist Church, Melksham
EWI7639	Geophysical Survey on Land at Bowerhill
EWI7643	Desk Based Assessment on Land at Semington Road
EWI7644	Geophysical Survey on Land at Semington Road
EWI7645	Evaluation on Land at Semington Road
EWI7690	Evaluation at Land South of Western Way, Bowerhill, Melksham
EWI7855	Geophysical Survey for Melksham Link, Wilts & Berks Canal
EWI7890	Field Observation East of Berryfield Lane
EWI7891	Desk-based Assessment and Geophysical Survey at Melksham Campus Development, Melksham
EWI7893	Evaluation at Melksham Campus Development, Melksham
EWI8775	Evaluation for Melksham Link Canal, Results of Stage 1 Trench Evaluation
EWI8775	Evaluation for Melksham Link Canal, Results of Stage 1 Trench Evaluation
EWI9019	Watching Brief on a Romano-British shrine and other archaeological features, Outmarsh Farm
EWI9102	Geophysical Survey of Land off Semmington Road, Melksham
EWI9104	Watching Brief of Land at Withleigh House, Melksham

EWI9193	Evaluation on Land off Semington Road
EWI9304	Evaluation at Melksham Campus Development
EWI9496	Excavation of Late Bronze Age Occupation at Semington Road
EWI7896	NAIS: Aerial Investigation and Mapping Across West Wiltshire
EWI9576	Evaluation on Land South of Western Way
EWI9696	Geophysical Survey at Western Way
EWI10039	Excavation at Melksham Campus (Phase 1 Development and Phase 2 North Car Park)
EWI10059	Evaluation of Land at Semington Road
EWI10244	Geophysical Survey, Melksham
EWI10289	Evaluation at Land West of 10 King Street, Melksham
EWI10289	Evaluation at Land West of 10 King Street, Melksham
EWI10370	Watching Brief at Melksham House
EWI10075	Heritage Impact Assessment for Land to the West of 10 King Street
EWI10654	Evaluation at Land off Western Way, Melksham
EWI10691	Geophysical Survey at Land at Berryfield Lane

EWI10873	Evaluation of Land at Berryfield Lane, Melksham
EWI11419	Desk Based Assessment for the Wiltshire Depot
EWI11526	New Lake at Boundary Farm, Berryfield Lane, Melksham, Wiltshire

HER Monument Data

Mon UID	Name	Period
MWI1918	Neolithic or Bronze Age Barrows, East of Frying Pan Farm	Prehistoric
MWI1918	Neolithic or Bronze Age Barrows, East of Frying Pan Farm	Prehistoric
MWI1918	Neolithic or Bronze Age Barrows, East of Frying Pan Farm	Prehistoric
MWI1918	Neolithic or Bronze Age Barrows, East of Frying Pan Farm	Prehistoric
MWI1918	Neolithic or Bronze Age Barrows, East of Frying Pan Farm	Prehistoric
MWI1918	Neolithic or Bronze Age Barrows, East of Frying Pan Farm	Prehistoric
MWI1919	Bronze Age Barrow, Berryfield	Prehistoric
MWI1920	Bronze Age Barrow, Berryfield	Prehistoric
MWI1921	Bronze Age Barrow, Berryfield	Prehistoric

MWI1922	Bronze Age Barrow, Berryfield	Prehistoric
MWI1923	Bronze Age Barrow, Berryfield	Prehistoric
MWI1924	Probable Iron Age/Roman Enclosure, Berryfield	Prehistoric
MWI73490	Bronze Age Barrow, Berryfield	Prehistoric
MWI73491	Bronze Age Barrow, Berryfield	Prehistoric
MWI78172	Early Iron Age Pits, Melksham Campus	Prehistoric
MWI78173	Early Iron Age Post Holes, Melksham Campus	Prehistoric
MWI78172	Early Iron Age Pits, Melksham Campus	Prehistoric
MWI78172	Early Iron Age Pits, Melksham Campus	Prehistoric
MWI77009	Middle Bronze/Early Iron Age Pits, East of Semington Road	Prehistoric
MWI77010	Middle Bronze/Early Iron Age Ditches, East of Semington Road	Prehistoric
MWI77010	Middle Bronze/Early Iron Age Ditches, East of Semington Road	Prehistoric
MWI77010	Middle Bronze/Early Iron Age Ditches, East of Semington Road	Prehistoric
MWI77010	Middle Bronze/Early Iron Age Ditches, East of Semington Road	Prehistoric
MWI77010	Middle Bronze/Early Iron Age Ditches, East of Semington Road	Prehistoric

MWI77010	Middle Bronze/Early Iron Age Ditches, East of Semington Road	Prehistoric
MWI77078	Iron Age Ditches, Bowerhill	Prehistoric
MWI77078	Iron Age Ditches, Bowerhill	Prehistoric
MWI77078	Iron Age Ditches, Bowerhill	Prehistoric
MWI77079	Iron Age Pits, Bowerhill	Prehistoric
MWI77080	Iron Age Four-Post Structures, Bowerhill	Prehistoric
MWI1840	Palaeolithic Flint, Bypass Bridge	Prehistoric
MWI1843	Neolithic Flint, Red House Farm	Prehistoric
MWI31372	Palaeochannels, Adjacent to River Avon	Prehistoric
MWI4919	Palaeolithic Flint, Bypass Bridge	Prehistoric
MWI4926	Bronze Age Palstave, Outmarsh Farm	Prehistoric
MWI75667	Neolithic/Bronze Age Enclosure, North of Boundary Farm	Prehistoric
MWI75770	Bronze Age Barrow Cemetery, Boundary Farm	Prehistoric
MWI76758	Late Bronze Age Pit, Melksham Campus	Prehistoric
MWI77081	Roman Ditches, Bowerhill	Romano-British

MWI77081	Roman Ditches, Bowerhill	Romano-British
MWI78174	Mid Roman Ditches, Melksham Campus	Romano-British
MWI78175	Mid Roman Pit, Melksham Campus	Romano-British
MWI78176	Late Roman Enclosures, Melksham Campus	Romano-British
MWI78177	Late Roman Pits, Melksham Campus	Romano-British
MWI78178	Late Roman Cremation Grave, Melksham Campus	Romano-British
MWI76759	Romano-British Pit, Melksham Campus	Romano-British
MWI75668	Roman Ditches, North East of Boundary Farm	Romano-British
MWI79063	Roman Ditches, North of Berryfield Lane	Romano-British
MWI78188	Roman Ditches, South of Melksham	Romano-British
MWI4927	Roman Coins, Northwest of Melksham Hospital	Romano-British
MWI79563	Roman Pottery, Land at Berryfield Lane	Romano-British
MWI4947	Place House, High Street	Medieval
MWI4948	Rectory Manor, Church Street	Medieval
MWI4950	Market Place, Melksham	Medieval

MWI76415	Medieval Gullies, Melksham Campus	Medieval
MWI74494	Medieval Enclosures, Melksham Campus	Medieval
MWI1875	Berryfields	Medieval
MWI4938	Melksham	Medieval
MWI78179	Anglo-Saxon Sunken Feature Buildings, Melksham Campus	Medieval
MWI1910	Medieval Ridge and Furrow, North of Outmarsh Farm	Medieval
MWI1910	Medieval Ridge and Furrow, North of Outmarsh Farm	Medieval
MWI1910	Medieval Ridge and Furrow, North of Outmarsh Farm	Medieval
MWI1910	Medieval Ridge and Furrow, North of Outmarsh Farm	Medieval
MWI131390	Medieval Ridge and Furrow, North of Outmarsh Farm	Medieval
MWI73880	Medieval Ridge and Furrow, North of Semington Brook	Medieval
MWI73892	Medieval Ridge and Furrow, Berryfield	Medieval
MWI73892	Medieval Ridge and Furrow, Berryfield	Medieval
MWI73901	Medieval Field Boundary, North of Holbrook Farm	Medieval
MWI73910	Medieval Ridge and Furrow, Monkton Farm	Medieval

MWI73916	Medieval Ridge and Furrow, South of Frying Pan Farm	Medieval
MWI73917	Medieval Enclosure, East of Frying Pan Farm	Medieval
MWI73924	Medieval Ridge and Furrow, Roundponds Farm	Medieval
MWI73961	Medieval Ridge and Furrow, South of Melksham	Medieval
MWI73978	Medieval Ridge and Furrow, Melksham	Medieval
MWI1910	Medieval Ridge and Furrow, North of Outmarsh Farm	Medieval
MWI1910	Medieval Ridge and Furrow, North of Outmarsh Farm	Medieval
MWI1910	Medieval Ridge and Furrow, North of Outmarsh Farm	Medieval
MWI1910	Medieval Ridge and Furrow, North of Outmarsh Farm	Medieval
MWI3632	Townsend Farm	Medieval
MWI73880	Medieval Ridge and Furrow, North of Semington Brook	Medieval
MWI73880	Medieval Ridge and Furrow, North of Semington Brook	Medieval
MWI73880	Medieval Ridge and Furrow, North of Semington Brook	Medieval
MWI73880	Medieval Ridge and Furrow, North of Semington Brook	Medieval
MWI73880	Medieval Ridge and Furrow, North of Semington Brook	Medieval

MWI73880	Medieval Ridge and Furrow, North of Semington Brook	Medieval
MWI73880	Medieval Ridge and Furrow, North of Semington Brook	Medieval
MWI73880	Medieval Ridge and Furrow, North of Semington Brook	Medieval
MWI73881	Post Medieval Ridge and Furrow, North of Outmarsh Farm	Medieval
MWI73892	Medieval Ridge and Furrow, Berryfield	Medieval
MWI73902	Medieval Field Boundary, East of Red House Farm	Medieval
MWI73910	Medieval Ridge and Furrow, Monkton Farm	Medieval
MWI73910	Medieval Ridge and Furrow, Monkton Farm	Medieval
MWI73910	Medieval Ridge and Furrow, Monkton Farm	Medieval
MWI73916	Medieval Ridge and Furrow, South of Frying Pan Farm	Medieval
MWI73924	Medieval Ridge and Furrow, Roundponds Farm	Medieval
MWI73924	Medieval Ridge and Furrow, Roundponds Farm	Medieval
MWI73961	Medieval Ridge and Furrow, South of Melksham	Medieval
MWI73961	Medieval Ridge and Furrow, South of Melksham	Medieval
MWI73974	Medieval Ridge and Furrow, South of Melksham	Medieval

MWI73974	Medieval Ridge and Furrow, South of Melksham	Medieval
MWI73978	Medieval Ridge and Furrow, Melksham	Medieval
MWI73978	Medieval Ridge and Furrow, Melksham	Medieval
MWI74495	Medieval Pits, Melksham Campus	Medieval
MWI79873	Semington Halt	Post-Medieval
MWI79882	Dunkirk Mill, Broughton Gifford	Post-Medieval
MWI4965	Maggs' Rope and Twine Works, Spa Road	Post-Medieval
MWI31389	19th Century Agricultural Building, Outmarsh Farm	Post-Medieval
MWI68632	Frying Pan Farm (Fryingpan Farm)	Post-Medieval
MWI68634	Red House Farm	Post-Medieval
MWI68667	Site of Outfarm, Southeast of Frying Pan Farm	Post-Medieval
MWI68695	Conigre Farm Hotel (Conigre Farm)	Post-Medieval
MWI68696	The West End Inn (Westend Farm)	Post-Medieval
MWI68697	South Townsend Farm (Townsend Farm)	Post-Medieval
MWI68698	Site of Outfarm, Northeast of South Townsend Farm	Post-Medieval

MWI68699	Site of Outfarm, West of South Townsend Farm	Post-Medieval
MWI68700	Site of Outfarm, East of New Inn PH	Post-Medieval
MWI68701	Site of Outfarm, Northeast of New Inn PH	Post-Medieval
MWI68702	Site of Outfarm, Southeast of New Inn PH	Post-Medieval
MWI68703	Site of Outfarm, Southeast of New Inn PH	Post-Medieval
MWI68704	Site of Farmstead, Northeast of Old Railway Farm	Post-Medieval
MWI68705	Site of Outfarm, Northeast of Old Railway Farmhouse, The Siding	Post-Medieval
MWI68850	Site of Outfarm, Southwest of Bowerhill Lodge Farm	Post-Medieval
MWI68851	Site of Outfarm, Spa Road	Post-Medieval
MWI79700	Wiltshire, Somerset and Weymouth Railway	Post-Medieval
MWI79884	Devizes Branch Railway	Post-Medieval
MWI9472	Wiltshire and Berkshire Canal	Post-Medieval
MWI68849	Site of Outfarm, Southeast of South Townsend Farm	Post-Medieval
MWI9472	Wiltshire and Berkshire Canal	Post-Medieval
MWI73944	Post Medieval Ridge and Furrow, Southeast of Berryfield	Post-Medieval

MWI73885	Post Medieval Ridge and Furrow, North of Berryfield	Post-Medieval
MWI48613	Holbrook Dairy Farm	Post-Medieval
MWI73267	The Milk Churn Pub and Restaurant	Modern
MWI31687	WWII Pillbox on the Kennet and Avon Canal	Modern
MWI31753	WWII Pillbox, East of Outmarsh	Modern
MWI73883	WWII Military Camps, Melksham	Modern
MWI73884	WWII Firing Range, West of Westward Farm	Modern
MWI31507	WWII Pillbox Next to the River Avon	Modern
MWI31508	WWII Pillbox Near to the River Avon	Modern
MWI31641	WWII Pillbox at Challeymead	Modern
MWI31642	WWII Pillbox, East of Frying Pan Farm	Modern
MWI31754	WWII Pillbox with Anti Tank Gun Emplacement, North of Outmarsh	Modern
MWI31885	WWII Pillbox, Northwest of Holbrook Farm	Modern
MWI73930	WWII Military Camp, Melksham	Modern

MWI73931	Emergency Water Supply, Spa Road	Modern
MWI4954	Bowerhill RAF Camp	Modern
MWI73930	WWII Military Camp, Melksham	Modern
MWI4954	Bowerhill RAF Camp	Modern
MWI73883	WWII Military Camps, Melksham	Modern
MWI73884	WWII Firing Range, West of Westward Farm	Modern
MWI73884	WWII Firing Range, West of Westward Farm	Modern
MWI4971	Undated Burial, near the Grove	Unknown
MWI1902	Undated Enclosure, Northwest of Berryfield Cottages	Unknown
MWI1908	Undated Ring Ditches, Northwest of Berryfield Cottages	Unknown
MWI74313	Undated Ditches, Semington Road	Unknown
MWI74359	Undated Pits, Bowerhill	Unknown
MWI74360	Undated Ditches, Bowerhill	Unknown
MWI76322	Undated Pits, South of Western Way	Unknown
MWI76323	Undated Ditches, South of Western Way	Unknown



MWI78428	Undated Circular Enclosure, South of Melksham	Unknown
MWI78429	Undated Ditches, South of Melksham	Unknown
MWI79064	Undated Pits, North of Berryfield Lane	Unknown

Historic England Data

Conservation Areas

Name
Melksham

Historic England Listed Buildings

List Entry	Name	Grade
1021707	CHURCH OF ST MICHAEL	II*
1021708	TURNER MEMORIAL IN THE CHURCHYARD ABOUT 45 METRES SOUTH OF LADY CHAPEL OF THE CHURCH OF ST MICHAEL	II*
1021709	WATSON MEMORIAL IN THE CHURCHYARD ABOUT 8 METRES SOUTH OF LADY CHAPEL OF CHURCH OF ST MICHAEL	II
1021711	WINTER MEMORIAL IN THE CHURCHYARD ABOUT 5 METRES NORTH OF CHANCEL OF CHURCH OF ST MICHAEL	II
1021712	FOX MEMORIAL IN THE CHURCHYARD, ABOUT 13 METRES NORTH OF PORCH OF CHURCH OF ST MICHAEL	II
1021713	MILES MEMORIAL IN THE CHURCHYARD ABOUT 13 METRES NORTH OF NORTH AISLE OF CHURCH OF ST MICHAEL	II

1021716	UNIDENTIFIABLE MEMORIAL ABOUT 2 METRES NORTH WEST OF FOX MEMORIAL IN CHURCHYARD OF CHURCH OF ST MICHAEL	II
1021718	UNIDENTIFIABLE MEMORIAL IN THE CHURCHYARD ABOUT 13 METRES NORTH OF PORCH OF CHURCH OF ST MICHAEL	II
1021719	UNIDENTIFIABLE MEMORIAL IN THE CHURCHYARD ABOUT 6 METRES NORTH OF NAVE OF CHURCH OF ST MICHAEL	II
1021720	GATE MEMORIAL IN THE CHURCHYARD ABOUT 4 METRES NORTH OF NAVE OF CHURCH OF ST MICHAEL	II
1021721	UNIDENTIFIABLE MEMORIAL IN THE CHURCHYARD ABOUT 7 METRES WEST OF TOWER OF CHURCH OF ST MICHAEL	II
1021722	BRUGES MONUMENT AND RAILED ENCLOSURE AGAINST SOUTH WALL OF SOUTH AISLE OF CHURCH OF ST MICHAEL	II
1021723	RUTTY MEMORIAL ABOUT 34 METRES FROM SOUTH EAST CORNER OF LADY CHAPEL OF CHURCH OF ST MICHAEL	II
1021724	UNIDENTIFIABLE MEMORIAL IN THE CHURCHYARD ABOUT 11 METRES EAST OF EAST END OF CHURCH OF ST MICHAEL	II
1021725	UNIDENTIFIABLE MEMORIAL IN THE CHURCHYARD ABOUT 9 METRES NORTH OF NORTH AISLE OF CHURCH OF ST MICHAEL	II
1021732	39, KING STREET	II
1021733	57, KING STREET	II
1021734	TAMAREE	II

1021735	6, KING STREET	II
1021736	QUAKER COTTAGE	II
1021737	16, KING STREET	II
1021741	9,11,13,15, MARKET PLACE	II
1021742	31, MARKET PLACE	II
1021743	THE LIMES	II
1021745	CONIGRE FARM HOTEL	II
1021746	8,10,12,14, SPA ROAD	II
1021747	36 AND 38, SPA ROAD	II
1193723	BREACH MEMORIAL IN THE CHURCHYARD ABOUT 12 METRES SOUTH OF LADY CHAPEL OF CHURCH OF ST MICHAEL	II
1193732	HUTTON MEMORIAL AGAINST EAST END OF CHURCH OF ST MICHAEL	II
1193745	SPRINGFORD MEMORIAL IN THE CHURCHYARD ABOUT 1 METRE NORTH OF CHANCEL OF CHURCH OF ST MICHAEL	II
1193749	UNIDENTIFIABLE MEMORIAL IN THE CHURCHYARD ABOUT 4 METRES NORTH OF NORTH AISLE OF CHURCH OF ST MICHAEL	II
1193761	REDMAN MEMORIAL IN THE CHURCHYARD ABOUT 13 METRES NORTH OF NORTH AISLE OF CHURCH OF ST MICHAEL	II

1193896	SHAUL MEMORIAL IN THE CHURCHYARD ABOUT 6 METRES NORTH OF PORCH OF CHURCH OF ST MICHAEL	II
1193905	UNIDENTIFIABLE MEMORIAL IN THE CHURCHYARD ABOUT 7 METRES NORTH OF NAVE OF CHURCH OF ST MICHAEL	II
1193911	COLLETT MEMORIAL IN THE CHURCHYARD ABOUT 4 METRES NORTH OF NORTH WEST CORNER OF NORTH AISLE OF CHURCH OF ST MICHAEL	II
1193918	CROOK MEMORIAL IN THE CHURCHYARD ABOUT 9 METRES TO NORTH WEST OF TOWER OF CHURCH OF ST MICHAEL	II
1193921	UNIDENTIFIABLE MEMORIAL IN THE CHURCHYARD ABOUT 6 METRES WEST OF TOWER OF CHURCH OF ST MICHAEL	II
1193930	NEWMAN MEMORIAL IN THE CHURCHYARD ABOUT 12 METRES WEST OF TOWER OF CHURCH OF ST MICHAEL	II
1193952	TOWNSEND MEMORIAL IN THE CHURCHAYARD ABOUT 12 METRES NORTH OF NORTH AISLE OF CHURCH OF ST MICHAEL	II
1193959	MAGGS MEMORIAL IN THE CHURCHYARD ABOUT 35 METRES FROM SOUTH EAST CORNER OF LADY CHAPEL OF CHURCH OF ST MICHAEL	II
1194129	13 AND 15, KING STREET	II
1194148	47, KING STREET	II
1194157	53 AND 55, KING STREET	II
1194175	2, KING STREET	II

1194196	8, KING STREET	II
1194210	NATIONAL SPIRITUALIST CHURCH	II
1194236	40 King Street	II
1194263	TOWN HALL	II
1194269	GATE PIERS AT ENTRANCE TO PLACE ROAD	II
1194283	THE KINGS ARMS HOTEL	II
1194318	2 AND 3, PLACE ROAD	II
1194321	GATE PIERS TO NORTH ENTRANCE OF MELKSHAM HOUSE	II
1194671	BERRYFIELDS COTTAGES	II
1194743	OLD RAILWAY FARMHOUSE THE SIDING	II
1262010	K6 TELEPHONE KIOSK OUTSIDE CLARE HOUSE, MARKET PLACE	II
1262910	FRYING PAN FARMHOUSE	II
1285743	WEST END PUBLIC HOUSE AND GARDEN WALLS	II
1285747	16, SPA ROAD	II
1285783	MELKSHAM HOUSE	II

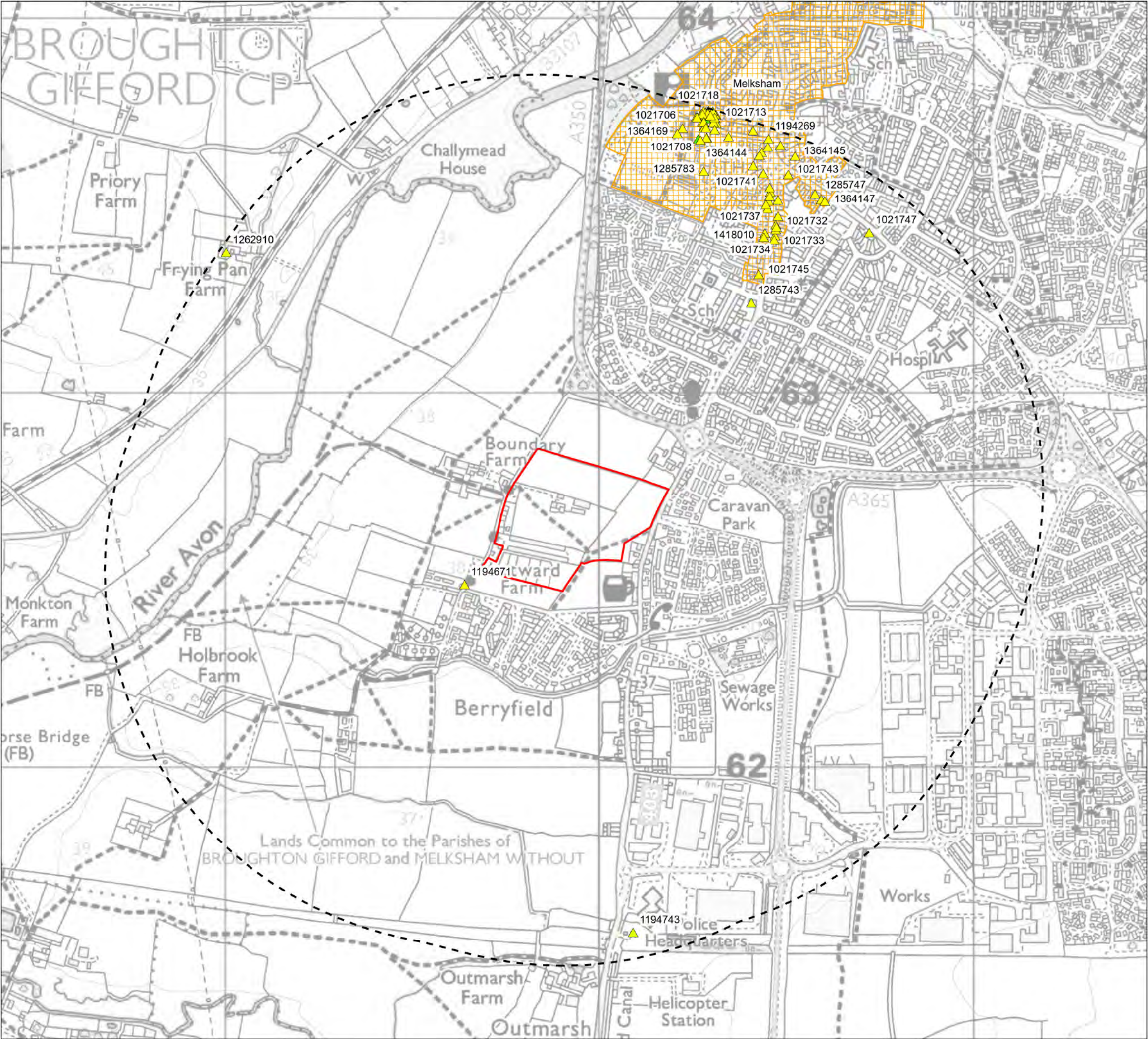
1285953	UNIDENTIFIABLE MEMORIAL ABOUT 3 METRES NORTH WEST OF FOX MEMORIAL IN CHURCHYARD OF CHURCH OF ST MICHAEL	II
1364133	UNIDENTIFIABLE MEMORIAL IN THE CHURCHYARD ABOUT 6 METRES NORTH OF PORCH OF CHURCH OF ST MICHAEL	II
1364134	BEAVEN CHEST TOMB IN RAILED ENCLOSURE ABOUT 9 METRES NORTH OF TOWER OF CHURCH OF ST MICHAEL	II
1364135	UNIDENTIFIABLE MEMORIAL IN THE CHURCHYARD ABOUT 8 METRES WEST OF TOWER OF CHURCH OF ST MICHAEL	II
1364136	NALDER MEMORIAL ABOUT 0.5 METRES SOUTH OF SOUTH AISLE OF CHURCH OF ST MICHAEL	II
1364137	HUTTON MEMORIAL IN THE CHURCHYARD ABOUT 9 METRES NORTH OF NORTH AISLE OF CHURCH OF ST MICHAEL	II
1364143	49 AND 51, KING STREET	II
1364144	GATE PIERS AND GATES TO NO 27 (MELKSHAM HOUSE)	II
1364145	RACHEL FOWLER CENTRE	II
1364146	GATE PIERS AND GATES INTO CHURCHYARD OF CHURCH OF ST MICHAEL AND ALL ANGELS	II
1364147	18 AND 20, SPA ROAD	II
1364169	6, 7, 8, 9 AND 10 ST MICHAELS COURT	II

1364170	CURNICK MEMORIAL IN THE CHURCHYARD ABOUT 45 METRES SOUTH OF LADY CHAPEL OF THE CHURCH OF ST MICHAEL	II
1364171	WILLIAMSON MEMORIAL IN CHURCHYARD ABOUT 10 METRES SOUTH OF LADY CHAPEL OF ST MICHAEL	II
1364172	UNIDENTIFIABLE MEMORIAL IN THE CHURCHYARD ABOUT 3 METRES NORTH OF NORTH AISLE OF CHURCH OF ST MICHAEL	II
1418010	42 King Street, Melksham	II
1021706	THE GROVE	II



Appendix 2: Figures

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KEY

Site

1km Study Area

Listed Buildings

Grade

▲ II*

▲ II

Conservation Areas

Contains National Heritage List for England data. Designated Heritage assets are labelled by List Entry Number. Conservation Areas are labelled by name.

REV	DATE	DESCRIPTION

FIGURE 1: DESIGNATED HERITAGE ASSETS

LAND WEST OF SEMINGTON ROAD, MELKSHAM.

BELLWAY STRATEGIC LAND

DATE	SCALE	DRAWN	APPROVED
23/07/2026	1:10,000@A3	HT/CH	HA

SHEET	REV	N	O	0.2KM
-	A	▲		

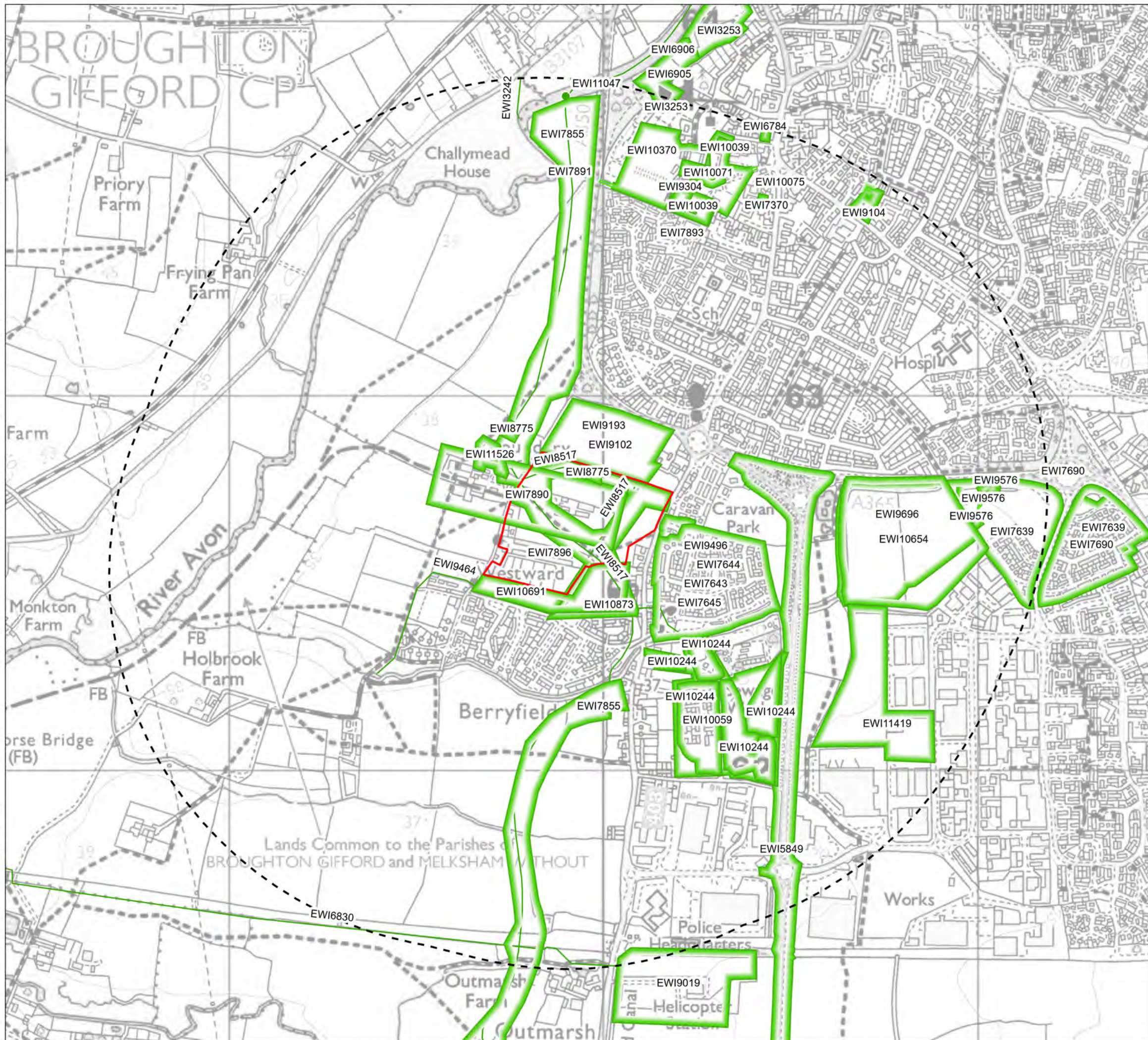
DRAWING NUMBER

P26-1582_HT_01

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KEY

- Site
- 1km Study Area
- Events (polygon)
- Events (point)
- Event (line)

Contains Wiltshire HER data. Records are labelled by their EWI number. Please cross reference to Appendix 1 of the Heritage Statement

REV	DATE	DESCRIPTION
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FIGURE 2: 'EVENTS'

LAND WEST OF SEMINGTON ROAD, MELKSHAM.

BELLWAY STRATEGIC LAND

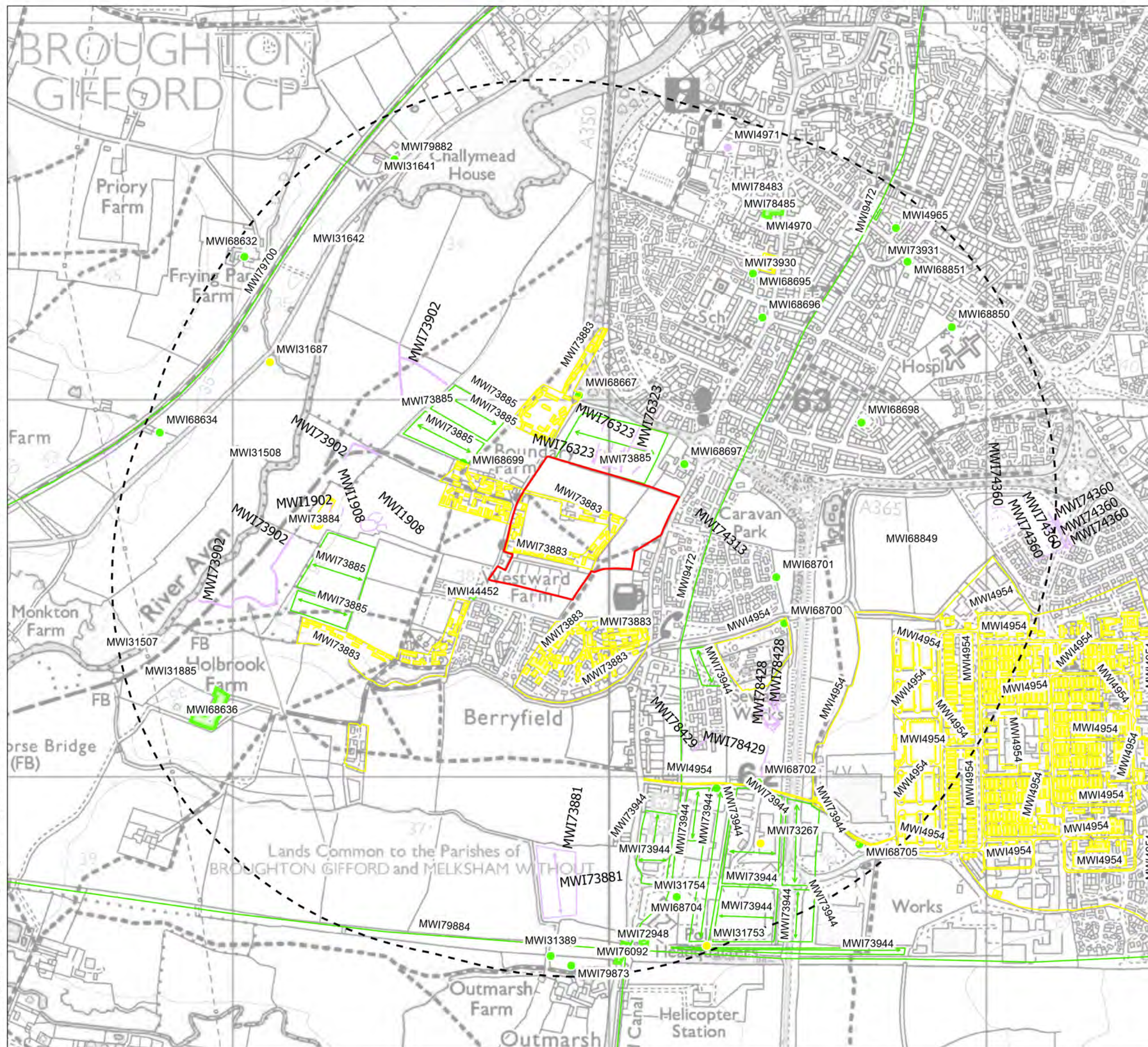
DATE	SCALE	DRAWN	APPROVED
23/07/2026	1:10,000@A3	HT/CH	HA
SHEET	REV	N	O
-	A	▲	0.2KM

DRAWING NUMBER
P26-1582_HT_02

PEGASUS GROUP

Contains Wiltshire HER data. Records are labelled by their MWI number. Please cross reference to Appendix 1 of the Heritage Statement

PEGASUS
GROUP



KEY

-  Site
-  1km Study Area
-  Undated (line)
-  Undated (point)
-  Modern (polygon)
-  Modern (line)
-  Modern (point)
-  Post-Medieval (polygons)
-  Post-Medieval (line)
-  Post-Medieval (point)

Contains Wiltshire HER data. Records are labelled by their MWI number. Please cross reference to Appendix 1 of the Heritage Statement

FIGURE 3C: 'MONUMENTS'

LAND WEST OF SEMINGTON ROAD, MELKSHAM.

DRAWING NUMBER
P26-1582_HT_03C

Appendix 3: Assessment Methodology

Assessment of significance

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

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”²⁶

Historic England's *GPA:2* gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.²⁷

In order to do this, *GPA 2* also advocates considering the four types of heritage value an asset may hold, as identified in English Heritage's *Conservation Principles*.²⁸ These essentially cover the heritage ‘interests’ given in the glossaries of the *NPPF* and the *PPG* which are archaeological, architectural and artistic, and historic.²⁹

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

- **Archaeological interest:** As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- **Architectural and artistic interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.
- **Historic interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.³⁰

²⁶ MHCLG, *NPPF*, Annex 2.

²⁷ Historic England, *GPA:2*.

²⁸ Historic England, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008). These heritage values

are identified as being ‘aesthetic’, ‘communal’, ‘historical’ and ‘evidential’, see *idem* pp. 28–32.

²⁹ MHCLG, *NPPF*, Annex 2; MHCLG, *PPG*, paragraph 006, reference ID: 18a-006-2019072.

³⁰ MHCLG, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

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

Historic England guidance on assessing heritage significance, *HEAN:12*, advises using the terminology of the *NPPF* and *PPG*, and thus it is that terminology which is used in this Report.³¹

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

Setting and significance

As defined in the *NPPF*:

“Significance derives not only from a heritage asset’s physical presence, but also from its setting.”³²

Setting is defined as:

“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”³³

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

Assessing change through alteration to setting

How setting might contribute to these values has been assessed within this Report with reference to *GPA:3*, particularly the checklist given on page 11. This advocates the clear articulation of “*what matters and why*”.³⁴

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

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

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

³¹ Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets*, Historic England Advice Note 12 (Swindon, October 2019).

³² MHCLG, *NPPF*, Annex 2.

³³ MHCLG, *NPPF*, Annex 2.

³⁴ Historic England, *GPA:3*, pp. 8, 11.

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

Paragraph 25 – “But – again in the particular context of visual effects – I said that if “a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one’s experience of the listed building in its surrounding landscape or townscape” (paragraph 56)”.

Paragraph 26 – “This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building’s setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations, as in Williams (see also, for example, the first instance judgment in R. (on the application of Miller) v North Yorkshire County Council [2009] EWHC 2172 (Admin), at paragraph 89). But it is clear from the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a–013–20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical. These other considerations may include, for example, “the historic relationship between places”. Historic England’s advice in GPA3 was broadly to the same effect.”³⁵

³⁵ Catesby Estates Ltd. V. Steer [2018] EWCA Civ 1697, paras. 25 and 26.

³⁶ MHCLG, *NPPF*, para. 213 and fn. 75.

Levels of significance

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

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

- **Designated heritage assets of the highest significance**, as identified in paragraph 213 of the *NPPF*, comprising Grade I and II* Listed Buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 75 of the *NPPF*;³⁶
- **Designated heritage assets of less than the highest significance**, as identified in paragraph 213 of the *NPPF*, comprising Grade II Listed Buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas);³⁷ and

³⁷ MHCLG, *NPPF*, para. 213.

- **Non-designated heritage assets.** Non-designated heritage assets are defined within the PPG as *"buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets"*.³⁸

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

Assessment of harm

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

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

- **Substantial harm or total loss.** It has been clarified in a High Court Judgement of 2013 that this would be harm that would *"have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced"*,³⁹ and

- **Less than substantial harm.** Harm of a lesser level than that defined above.

With regards to these two categories, the PPG states:

"Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated."⁴⁰

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

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

It is also possible that development proposals will cause no harm or preserve the significance of heritage assets. Here, a High Court Judgement of 2014 is relevant. This concluded that with regard to preserving the setting of a Listed building, *"preserving"* means doing *"no harm"*.⁴¹

Preservation does not mean no change, it specifically means no harm. GPA:2 states that *"Change to heritage assets is inevitable but*

³⁸ MHCLG, PPG, paragraph 039, reference ID: 18a-039-20190723.

³⁹ Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin), para. 25.

⁴⁰ MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.

⁴¹ R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).

it is only harmful when significance is damaged".⁴² Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

As part of this, setting may be a key consideration. When evaluating any harm to significance through changes to setting, this Report follows the methodology given in *GPA:3*, described above. Fundamental to this methodology is a consideration of "*what matters and why*".⁴³ Of particular relevance is the checklist given on page 13 of *GPA:3*.⁴⁴

It should be noted that this key document also states:

"Setting is not itself a heritage asset, nor a heritage designation..."⁴⁵

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

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

"Conserving or enhancing heritage assets by taking their settings into account need not prevent change".⁴⁶

Additionally, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor,

would necessarily require Planning Permission to be refused. This point has been clarified in the Court of Appeal.⁴⁷

Benefits

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

As detailed further in **Appendix 5** the *NPPF* (at Paragraphs 214 and 215) requires harm to a designated heritage asset to be weighed against the public benefits of the development proposals.⁴⁸

Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 214 to 216.⁴⁹

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

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

⁴² Historic England, *GPA:2*, p. 9.

⁴³ Historic England, *GPA:3*, p. 8.

⁴⁴ Historic England, *GPA:3*, p. 13.

⁴⁵ Historic England, *GPA:3*, p. 4.

⁴⁶ Historic England, *GPA 3*, p. 8.

⁴⁷ *Palmer v Herefordshire Council & Anor* [2016] EWCA Civ 1061.

⁴⁸ MHCLG, *NPPF*, paras. 214 and 215.

⁴⁹ Including – *Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor* [2020] EWHC 2292 (Admin); MHCLG, *NPPF*, paras. 214 and 216.

private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- *sustaining or enhancing the significance of a heritage asset and the contribution of its setting*
- *reducing or removing risks to a heritage asset*
- *securing the optimum viable use of a heritage asset in support of its long term conservation.”⁵⁰*

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

⁵⁰ MHCLG, PPG, paragraph 020, reference ID: 18a-020-20190723.

Appendix 4: Legislative Framework

Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and Conservation Areas.⁵¹ It does not provide statutory protection for non-designated or Locally Listed heritage assets.

Section 66(1) of the Act states that:

“In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”⁵²

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

“Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight”

when the decision-maker carries out the balancing exercise.”⁵³

A judgement in the Court of Appeal (‘Mordue’) has clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134 of the 2012 version of the NPPF, the requirements of which are now given in paragraph 215 of the current, revised NPPF, see **Appendix 5**), this is in keeping with the requirements of the 1990 Act.⁵⁴

In addition to the statutory obligations set out within the *Planning (Listed Buildings and Conservation Area) Act 1990*, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.⁵⁵

⁵¹ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

⁵² UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990, Section 66(1).

⁵³ Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EWCA Civ 137. para. 24.

⁵⁴ Jones v Mordue [2015] EWCA Civ 1243.

⁵⁵ UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

Appendix 5: National Policy Guidance

The National Planning Policy Framework (December 2024)

National policy and guidance is set out in the Government's *National Planning Policy Framework (NPPF)* published in December 2024. This replaced and updated the previous *NPPF* (December 2023). The *NPPF* needs to be read as a whole and is intended to promote the concept of delivering sustainable development.

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

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

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

"Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- a. all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;***
- b. strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:***
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting***

the overall scale, type or distribution of development in the plan area; or

- ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

For decision-taking this means:

- a. *approving development proposals that accord with an up-to-date development plan without delay; or*
- b. *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. *the application policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations,*

making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”⁵⁶

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

“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.”⁵⁷ (our emphasis)

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

Heritage Assets are defined in the NPPF as:

“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage

⁵⁶ MHCLG, NPPF, para. 11.

⁵⁷ MHCLG, NPPF, para. 11, fn. 7.

assets and assets identified by the local planning authority (including local listing).⁵⁸

The NPPF goes on to define a Designated Heritage Asset as a:

“World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation.”⁵⁹

As set out above, significance is also defined as:

“The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”⁶⁰

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

“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on

a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”⁶¹

Paragraph 210 goes on to state that:

“In determining planning applications, local planning authorities should take account of:

- a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;***
- b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and***
- c. the desirability of new development making a positive contribution to local character and distinctiveness.”⁶²***

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

“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the

⁵⁸ MHCLG, NPPF, Annex 2.

⁵⁹ MHCLG, NPPF, Annex 2.

⁶⁰ MHCLG, NPPF, Annex 2.

⁶¹ MHCLG, NPPF, para. 208.

⁶² MHCLG, NPPF, para. 210.

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.”⁶³

“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.”⁶⁴**

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

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

“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site; and**
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and**
- c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and**
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.”⁶⁵**

Paragraph 215 goes on to state:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”⁶⁶

⁶³ MHCLG, *NPPF*, para. 212.

⁶⁴ MHCLG, *NPPF*, para. 213.

⁶⁵ MHCLG, *NPPF*, para. 214.

⁶⁶ MHCLG, *NPPF*, para. 215.

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

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”⁶⁷

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

National Planning Practice Guidance

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

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

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

“Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.”⁶⁸

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

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

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may

⁶⁷ MHCLG, NPPF, para. 216.

⁶⁸ MHCLG, PPG, paragraph 007, reference ID: 18a-007-20190723.

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.”⁶⁹ (our emphasis)

National Design Guide:

Section C2 relates to valuing heritage, local history and culture and states:

“When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape.”⁷⁰

“Sensitive re-use or adaptation adds to the richness and variety of a scheme and to its diversity of activities and users. It helps to integrate heritage into proposals in an environmentally sustainable way.”⁷¹

It goes on to state that:

“Well-designed places and buildings are influenced positively by:

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

Today’s new developments extend the history of the context. The best of them will become valued as tomorrow’s heritage, representing the architecture and placemaking of the early 21st century.”⁷²

⁶⁹ MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.

⁷⁰ MHCLG, NDG, para. 46.

⁷¹ MHCLG, NDG, para. 47.

⁷² MHCLG, NDG, paras. 48-49.

Appendix 6: Relevant Development Plan Policies

Wiltshire Core Strategy (to 2026)

Core Policy 58: Ensuring the Conservation of the Historic Environment

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

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

- 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.*
- vii. 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).

- viii. 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.”*

Joint Melksham Neighbourhood Plan 2 2020–2038

Policy 21: Local Heritage

“Proposals for development within the Melksham Conservation Area must show how they preserve or enhance the setting, characteristics and special qualities that make up the architectural and historic character.

For other assets of local heritage importance, including archaeological importance, and buildings or structures identified as Non-designated Heritage Assets (as set out in the 2023 Locally Valued Non-designated Heritage Asset Report or subsequent updates), mapped on Figure 19 (including notable buildings as shown on Figure 20) development proposals should demonstrate that appropriate consideration has been given to:

- a. the significance of the heritage asset;*
- b. its most distinctive and important features;*
- c. the elements of its setting and immediate surrounds that contribute to its significance, and*
- d. the contribution the asset and its setting makes to the character of the local area (whether in a Conservation Area or not).*
- e. any planning application must not only consider heritage issues but show that they have been fully taken into account via a heritage statement. Archaeological surveys of a particular site may also be required prior to the determination of an application."*

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

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