



**Land at First Lane
Whitley
Melksham
Wiltshire**

*Proportionate Heritage Statement,
including an Archaeological Assessment*

BBHC Project: 2041
BBHC Report: 18165

August 2026



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EXECUTIVE SUMMARY

This report has been commissioned, in line with the requirements of the National Planning Policy Framework (2026), to provide a proportionate Heritage Statement and Archaeological Assessment, including a Significance Assessment (Section 4) and Heritage Impact Assessment (Section 5), in relation to a Permission in Principle (PiP) application for the proposed development of two self-build dwellings on land south of First Lane, Whitley, Melksham, Wiltshire.

Following archaeological desk-based assessment, geophysical survey and archaeological evaluation of the site (Section 3) it is concluded that, whilst there is some evidence for archaeological activity in the form of an isolated ditch containing a very small quantity of late medieval pottery, along with redeposited ironworking slag and an ironworking furnace bottom of unknown date and provenance, the overall archaeological potential of the site is very low and the development would have no effect upon significant archaeological remains. No further archaeological investigation is proposed.

The built heritage assessment considers the potential indirect effects of the proposed development upon the settings of three proximate listed buildings: Lagard House and Nos 120-122 First Lane. Whilst there is some intervisibility with the listed buildings it is concluded that the application site does not form part of any key element of the historic or present settings of those buildings which allow appreciation of, or contribute to, their special architectural or historic interests. Where the development would be intervisible with the listed buildings to variable extents seasonally, due to intervening built form and vegetation, it is considered that any perceived residual slight adverse visual effects could be overcome at the technical details stage, if required, through consideration of building layout, scale and massing and/or through further strengthening of the planting at the northern site boundary. Implementation of the proposed development is therefore considered likely to have no effect upon significance in the historic environment, and would therefore conserve heritage significance in the historic environment, in compliance with the requirements of Section 20 of the NPPF (2026): *Conserving and enhancing the historic environment* and Wiltshire Council Policies CP57 and CP58.

1. INTRODUCTION

- 1.1 The application for Permission in Principle to which this proportionate Heritage Statement and Archaeological Assessment relates is for the erection of two self-build dwellings and associated works on land south of First Lane, Whitley, Melksham, Wiltshire, SN12 8RL (centred at approx. NGR 388682,165971; Fig. 1). The applicable heritage (including archaeological) legislation, national and local planning policy in relation to this application is set out at Appendix 1.

The Site

- 1.2 The application site comprises part of an open pasture field covering an area of c. 5010m² situated directly to the south of First Lane. The two proposed dwelling plots are divided by an existing open water course that runs through the central part of the site on a diagonal, with its northern end culverted to provide access between the two parcels of land thus defined. The culvert drains to the South Brook, which runs east/west at the bottom of the larger field containing the application site. During site visits by the author on 3 March and 18 August 2026 the site had a covering of short grass, with a pile of earth and rubble evident in the west.

Planning background

- 1.3 A previous application to Wiltshire Council (Application No. PL/2025/08987) was withdrawn to allow the applicant to address matters of heritage, archaeology and other technical matters relating flood risk and highways. This statement addresses matters of heritage and archaeology only.
- 1.4 The Conservation Officer's comments regarding Application No. PL/2025/08987 addressed concerns regarding potential adverse (visual) impacts upon the rural, open-field agricultural settings of three Grade II-listed buildings: the late 17th-century cottages at 120-122 First Lane, to the north of the site (listed separately as two properties: 120 First Lane, NHLE 1194727 and The Malt House, 122 First Lane, NHLE 1021766; Fig. 1) and Lagard House, First Lane, a historic 18th-century farmhouse, to the west of the site (NHLE 1194703; Fig. 1). The potential harm was assessed by the Conservation Officer to be at '...a lesser scale', which is presumed to mean the heritage harm resulting from implementation of development proposals would be at the lower end of the scale of harm, in NPPF terms.

1.5 The Archaeological Officer's concerns regarding Application No. PL/2025/08987 related to the recent discovery of Romano-British settlement activity near Whitley and the possibility that the application site might contain similar such previously unrecorded buried archaeological remains. The Wiltshire Historic Environment Record (HER) also records ridge and furrow earthworks (HER MWI73922; Fig. 2) across the site and medieval field systems to the south. The Officer concluded that archaeological remains may be well preserved and the site should therefore be subject to archaeological evaluation by means of geophysical survey followed by trial trenching.

1.6 Following the withdrawal of Application No. PL/2025/08987 in February 2026, a pre-application enquiry was subsequently submitted to Wiltshire Council in March 2026 (Ref. ENQ/2026/00621), including a pre-application Heritage Statement prepared by BBHC. The archaeological officer's response to the pre-application enquiry stated:

This proposal is located in an area of some archaeological potential with the remains of medieval field systems located to the south and the remains of ridge and furrow agriculture recorded across the site itself. Recent discoveries have also been made of an extensive Romano-British settlement (with associated field systems and satellite settlements) just to the southeast of Whitley, so there is every chance of the current proposals impacting upon as-yet unrecorded archaeological features. As the site does not appear to have been impacted by modern development, any features that do exist there would be relatively well-preserved.

What is required at this stage is for work to be carried out to assess the actual archaeological potential of the site. I would therefore advise that any future planning application is accompanied by a report on the results of a geophysical survey. I would advise any future applicant to engage the services of an archaeological contractor to carry out this survey at the earliest available opportunity.

It is likely that I will require a trial trench evaluation of the site to be carried out prior to the determination of any planning application once the results of the geophysical survey are known. This evaluation would ground-truth the results of the remote sensing.

I would then be able to offer you a fully informed opinion of the likely impact of any future proposals upon the archaeological resource recorded there.

- 1.7 The requested archaeological investigations have subsequently been carried out and are summarised within this report, with the geophysical survey and archaeological evaluation reports included within the planning submission.

- 1.8 In the pre-application response with regard to built heritage, the BBHC pre-application Heritage Statement was not referenced in the Officer's report, which states:

The sites proximity to listed buildings, and comment on how development will impact the setting of those nearby listed buildings, was somewhat missing from previous submissions – I would strongly recommend including a heritage statement with any future submission to clearly demonstrate if/how the proposed dwellings would preserve the setting of the heritage assets. It is possible that, given the degree of separation between the site and nearby listed buildings by virtue of the road/other existing built form, that the scheme would represent neutral harm; however, given that the undeveloped site is beneficial for the character of the area, it is possible that a scheme could be assessed as resulting in less-than-substantial harm to the heritage setting, which would require public benefit – given the scale of the scheme, in that circumstance, I would recommend not limiting any proposed benefit to perceived benefit to the HLS. I would recommend meeting the aims of renewable energy policies, if viable.

- 1.9 The pre-application response goes on to reference the three reasons for refusal of a 2021 outline planning application for development of four dwellings at the site, which related to i) sustainable development, ii) the site's location (in 'open countryside') and iii) impact on landscape character and the lack of sufficient information with regard to drainage and flooding. It is noted that the setting of heritage assets was not cited in the reasons for refusal of that application.

- 1.10 The BBHC pre-application Heritage Statement provided a significance and settings assessment for the identified designated heritage assets (three listed buildings), and concluded that:

Whilst the development will introduce some new built form and a slightly increased sense of urbanisation into the surroundings of the three listed buildings which might be considered to cause adverse visual effects, the above analysis has shown that these effects are slight and will not affect any of the important aspects of significance which they derive from their settings. It is anticipated the proposed development will therefore have a neutral effect upon the significance of built heritage, conserving both the key architectural and historical significances of the listed buildings for which they are primarily listed and the significance they each derive from their settings. The residual slight adverse visual effects upon glimpsed views out from the listed cottages could be mitigated through further strengthening of the planting at the northern site boundary.

Methodology

- 1.11 This Heritage Statement (including Archaeological Assessment) has been prepared by Bristol & Bath Heritage Consultancy to provide a proportionate assessment of the potential impacts of the proposals on the significance of assets in the historic environment, as required by the National Planning Policy Framework (NPPF 2026), which sets out that:

Development proposals affecting heritage assets should be accompanied by an assessment of the significance of the assets affected (including any contribution made by their setting) and of the potential effect of the proposal on their significance. The level of detail should be proportionate to the assets' importance and no more than is necessary to understand the potential effect of the proposal on their significance. The relevant historic environment record should be referred to in making this assessment, and appropriate expertise employed where necessary'. [NPPF (2026) Policy HE5.1]

- 1.12 This independent heritage statement provides an assessment of the significance of cultural heritage assets within, and in the environs of, the application site, and of the impact of the development proposals upon that significance. The National Planning Policy Framework [NPPF], which since 2012 has incorporated the Government's heritage policy and is now in an eighth edition (published 17 August 2026), recognises that the historic environment is an irreplaceable resource whose fragile and finite nature is a particularly important consideration in planning. Policy HE4.1 of the NPPF (2026) is clear that

Heritage assets, as an irreplaceable resource, should be conserved in a manner appropriate to their significance. [NPPF 2026 Policy HE4.1]

- 1.13 This reinforces the significance-based approach set out in the earlier Historic Environment Good Practice Advice in Planning: 2 (entitled 'Managing Significance in Decision-Taking in the Historic Environment' and published in July 2015; HE 2015), which states:

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

- 1.14 HEGPA 2 also supports the NPPF's proportionate approach to such assessment in its introduction:

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

- 1.15 The HEGPA 2 Good Practice Advice advocates a logical step-by-step approach to dealing with heritage assets during the planning and design of development and subsequently in making a planning application – namely:

- *'Understand the significance of the affected assets*
- *Understand the impact of the proposal on that significance*
- *Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF*
- *Look for opportunities to better reveal or enhance significance*
- *Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change.*

- *Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.* [HEGPA 2, paragraph 6]

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

1.17 This statement has been prepared with the use of information readily available at the time it was being researched and produced (August 2026). The assessment methodology included:

- Examination of the National Heritage List for England (NHLE; Fig. 1);
- Examination of the Wiltshire Historic Environment Record and Know Your Place websites (Fig. 2);
- Historic map regression (Figs 4-9);
- Hillshade analysis of freely available DEFRA LiDAR data (Fig. 3);
- Site visits by the author on 27 February, 3 March 2026 and 18 August 2026, including walking the public footpaths to the west (MELW78) and south (MELW79) of the application site and the surrounding public roads to the east (Corsham Road) and north (First Lane).

Limitations of this report

1.18 Changes to circumstances following the compilation of this Heritage Statement, including changes to the proposed development area, nature of the development proposals or the availability of new information, guidance or legislation, may lead to a requirement for re-evaluation of the Statement's content and/or conclusions. Examples of this include the subsequent addition of new areas to the development site which were not required to be considered within this iteration of the report, updates to heritage-related planning legislation, policy or guidance, updates to historic environment standards and guidance, or the availability of new information on the historic environment, such as the release of updated lists of nationally and locally-designated heritage assets, or the release of previously unavailable reports or research.

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2. IDENTIFICATION OF HERITAGE ASSETS POTENTIALLY AFFECTED (FIGS1-2)

Designated Heritage Assets

- 2.1 Further to the pre-application feedback, site visits, historic map regression and topographical analysis, it is concluded that the development may have potential indirect effects upon the significance of the three most proximate designated heritage assets as a result of changes to the settings of three Grade II-listed buildings (Fig. 1):

- i) 120 First Lane, NHLE 1194727
- ii) The Malt House, 122 First Lane, NHLE 1021766, and;
- iii) Lagard House, First Lane, NHLE 1194703

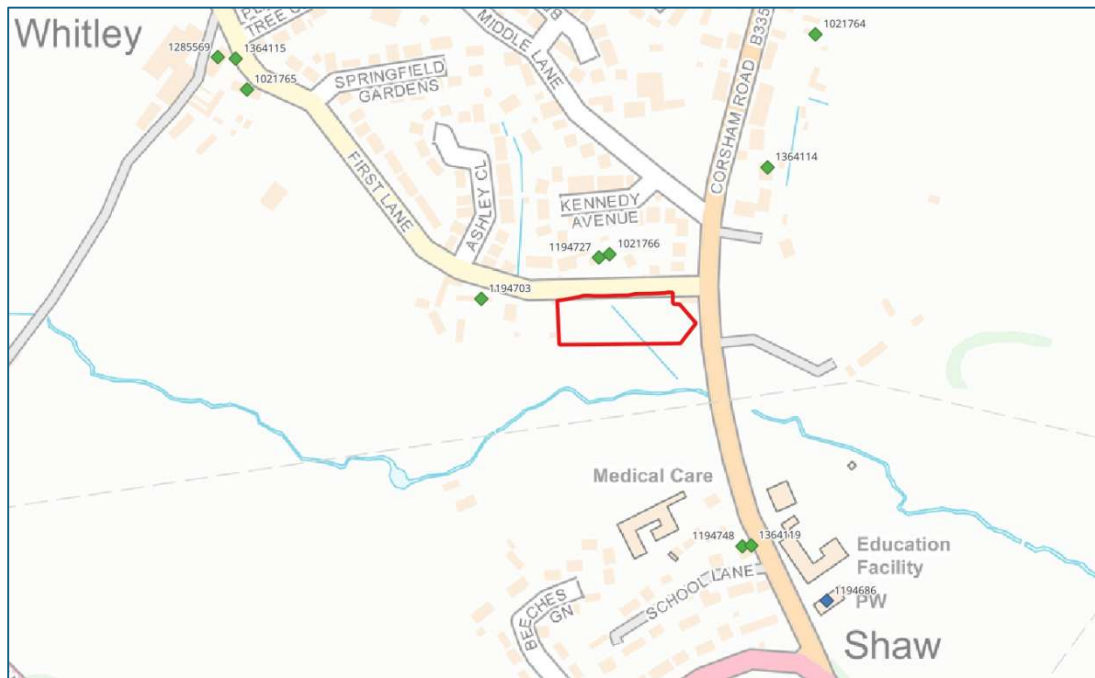


Fig. 1 Site location (red line) with designated heritage assets (Grade II* listed buildings = blue diamonds; Grade II listed buildings = green diamonds). OS PMCL AC0000855630

- 2.2 The application site does not form a significant component of the setting of any other designated heritage assets, and these three are therefore the only built heritage taken forward for further analysis.

Non-designated heritage assets

- 2.3 The HER records possible medieval ridge and furrow within the application site (Fig. 2: MWI73922), which is discussed further at Section 3 below, alongside a discussion of the potential for the site to contain buried archaeological remains.

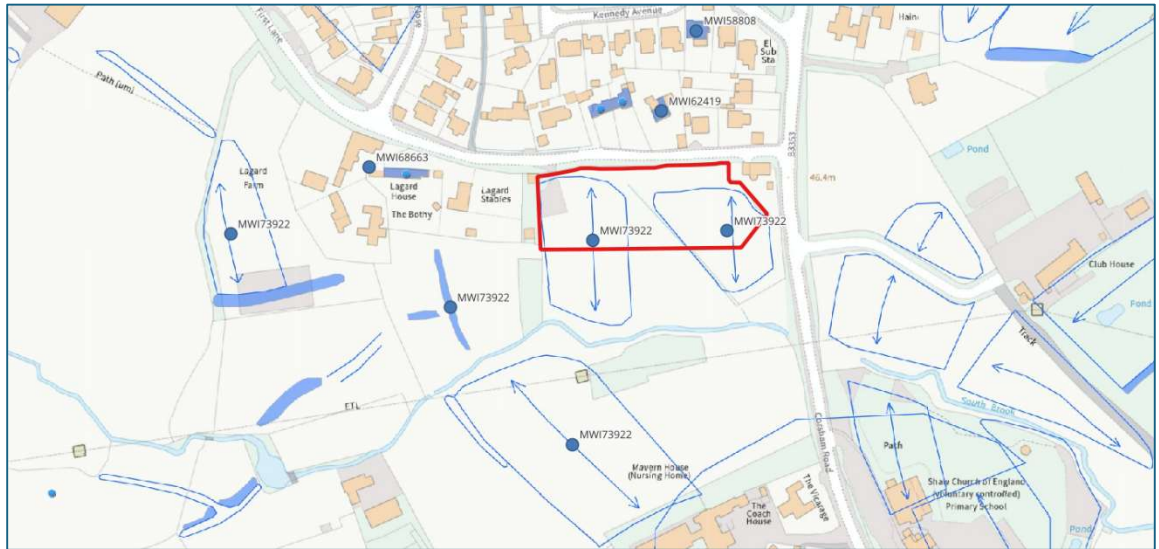


Fig. 2 Non-designated heritage assets recorded on the Wiltshire HER (information from Know Your Place website) OS PMCL AC0000855630

3. ARCHAEOLOGICAL AND HISTORICAL BACKGROUND (FIGS 3-12)

- 3.1 The application site is on bedrock geology comprising Oxford Clay Formation, mudstone of the Jurassic period (formed between 166,100,000 and 157,300,000 years ago). These are sedimentary rocks of shallow marine origin. They are detrital, ranging from coarse- to fine-grained (locally with some carbonate content) forming interbedded sequences. To the south of the application site this is overlain by superficial deposits of River Terrace 1 sands and gravels, sedimentary deposits which are fluvial in origin. They are detrital, ranging from coarse- to fine-grained and form beds and lenses of deposits reflecting the channels, floodplains and levees of a river or estuary (if in a coastal setting; BGS Geology Viewer <https://geologyviewer.bgs.ac.uk/> accessed 5 March 2025). In this case, the superficial deposits follow the course of South Brook, which flows from west to east.
- 3.2 The site lies on a gently sloping pasture field which drops north/south from First Lane, which lies at an elevation of c. 45.95m AOD, down to the South Brook at 44m AOD. Both of the proposed house plots are situated at an elevation of c. 45-45.5m AOD. Whitley rises to the north of First Lane, with the front gardens of 120-122 First Lane set at an elevation of c. 47m. The fields to the south of South Brook rise up to Shaw, reaching an elevation of c. 46.3m AOD just north of the Mavern Care Home facility which defines the northern edge of built form in Shaw.

- 3.3 Very little archaeological investigation has previously been undertaken within Whitley, a village with Saxon origins (Wiltshire HER Ref. ST86NE401). Medieval or post medieval settlement earthworks and ridge and furrow have been identified at Whitley from historic air photos and 2005 LiDAR (Wiltshire HER Ref. ST86NE453). A building platform was seen on 1946 aerial photographs. Associated with this were a series of ditches and some ridge and furrow. All of these earthworks, which are all in the northern part of the village, have since been levelled and the area is now built upon by the housing estates of Grange Close, Brookfield Rise and Eden Grove. On the north side of Top Lane the earthworks of three house platforms are visible on LiDAR (not illustrated). Associated with these are a series of hollow ways, ditches, a further possible house platform and ridge and furrow. Other ridge and furrow levelled since 1946 extended north-east up to and along the southern side of the east/west Roman road from Bath to Speen which marks the parish boundary c. 1km north of the application site (Atworth Roman villa, just to the south of this road, lies 3km west of the application site). Ridge and furrow and associated banks and ditches was situated to the west along the north side of Whitley. This has been largely levelled.
- 3.4 The HER records Roman finds c. 500m to the north-east of the present application site, at a site to the east of the junction between Top Lane and the Corsham Road. It was evaluated by Avon Archaeology in June 2025, following an earlier geophysical survey by Archaeological Surveys Ltd. Evidence of past human activity was limited and dispersed in pockets across the site. It included two probable, but undated, fire pits, one of which was adjacent to a feature which produced Romano-British pottery. Residual Romano-British pottery was recovered from three other trenches, probably dispersed by the plough but indicating a background of low-level Roman activity. Features were shallow, did not correlate well with the results of the preceding geophysical survey and the pottery found was poorly preserved. The evaluation concluded the archaeological potential was low, despite the presence of these features (Avon Archaeology 2025, 15).
- 3.5 More substantive Roman roadside settlement was found in 2018 at Beanacre, more of which was revealed during a large-scale archaeological evaluation in 2021 at Wick Solar Farm, Lacock, 1650m to the northeast of the application site on Oxford Clay with superficial deposits of River Terrace 1 sands and gravels. Features included ditches, pits and postholes, walls, ovens and surfaces, as well as the surface and flanking ditches of the Bath to Speen Roman road (located in a trench c. 1850m NE

of the application site) extending through the settlement. Where sampled in 2021, the features produced substantial quantities of pottery, mostly of mid to late 2nd-century to 4th-century AD date, along with coins, brooches, copper rings, a bracelet, a whole pot, decorated Samian pottery, and other objects. Two notable areas of Iron Age/Roman settlement activity were also recorded during the same evaluation, c. 2.5km and 2.85km to the northeast of the present application site (Cotswold Archaeology 2021, 58). These discoveries indicate some potential for Roman activity within a c. 3km radius of the application site, all found to the north of the site broadly along the route of the Bath to Speen Roman road. However, there is no certain evidence for Roman activity within 500m of the application site, which is not situated on the River Terrace 1 deposits on which much of the more intensive Roman settlement activity to the northeast was sited.

- 3.6 The HER records possible medieval ridge and furrow within the application site (MWI73922), which was found to be evident as earthworks during the site visit. This is represented by very straight and relatively narrow ridges and furrows orientated north/south, with a triangular gap towards the centre of the site and which is clearly evident in the LiDAR Hillshade analysis (Fig. 3). A dip in the ground is evident in the eastern part of the site, possibly an infilled pond or quarry, as is a removed field boundary crossing the western area. The ridge and furrow is noticeably straighter and narrower than the more typically medieval 'reversed S-shape' curving ridge and furrow that can be seen in the surrounding areas; it also respects field boundaries established after the tithe map but before the First Edition Ordnance Survey (Fig. 7). The ridge and furrow within the application site would seem likely to be post-medieval and probably mid- to late-19th-century in date on this basis.

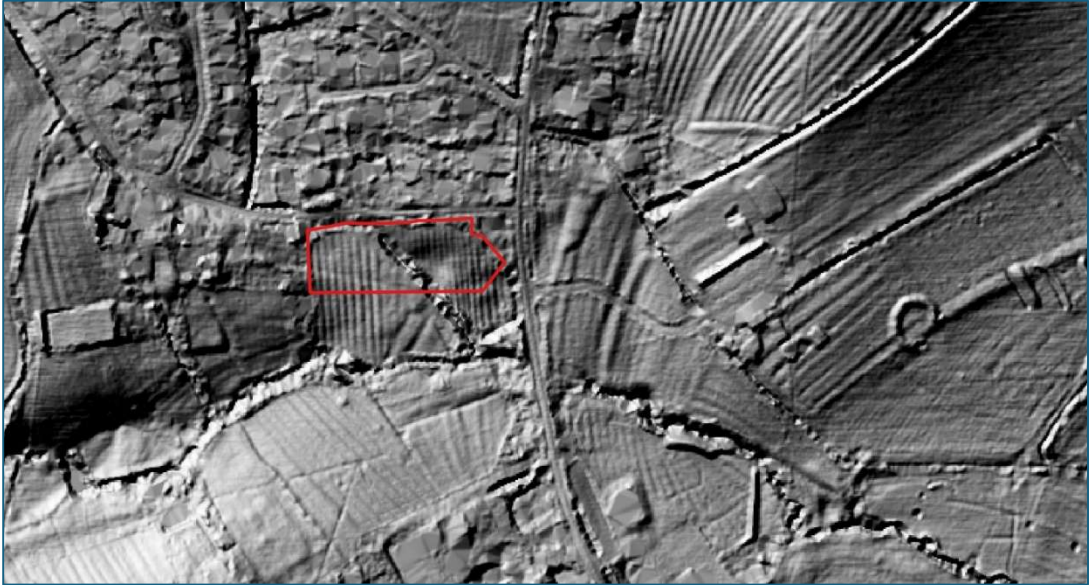


Fig. 3 LiDAR Hillshade analysis using DEFRA 2022 composite 1m DTM (azimuth 315, z10, alt 35), site outline in red. OS PMCL AC0000855630

Geophysical Survey (Fig. 4)

- 3.7 A site-specific Magnetometer survey was undertaken by Archaeological Surveys Ltd in July 2026, in accordance with the advice given in the Council's pre-application response (AS 2026). This included the whole of the field within which the present application site forms only the northern half. The survey identified extant narrow ridge and furrow as well as linear depressions associated with formerly removed field boundaries. The southern part of the survey area (beyond the present application site) was the site of a post medieval building shown by historic maps (see below) and here the survey recorded anomalies associated directly with the building along with a former trackway or possible wall and further spreads of what appeared to be demolition material. A number of formerly mapped field boundaries appeared to be associated with magnetic anomalies, along with a rectilinear anomaly and several fragmented linear and discrete anomalies that appeared to relate to cut features.

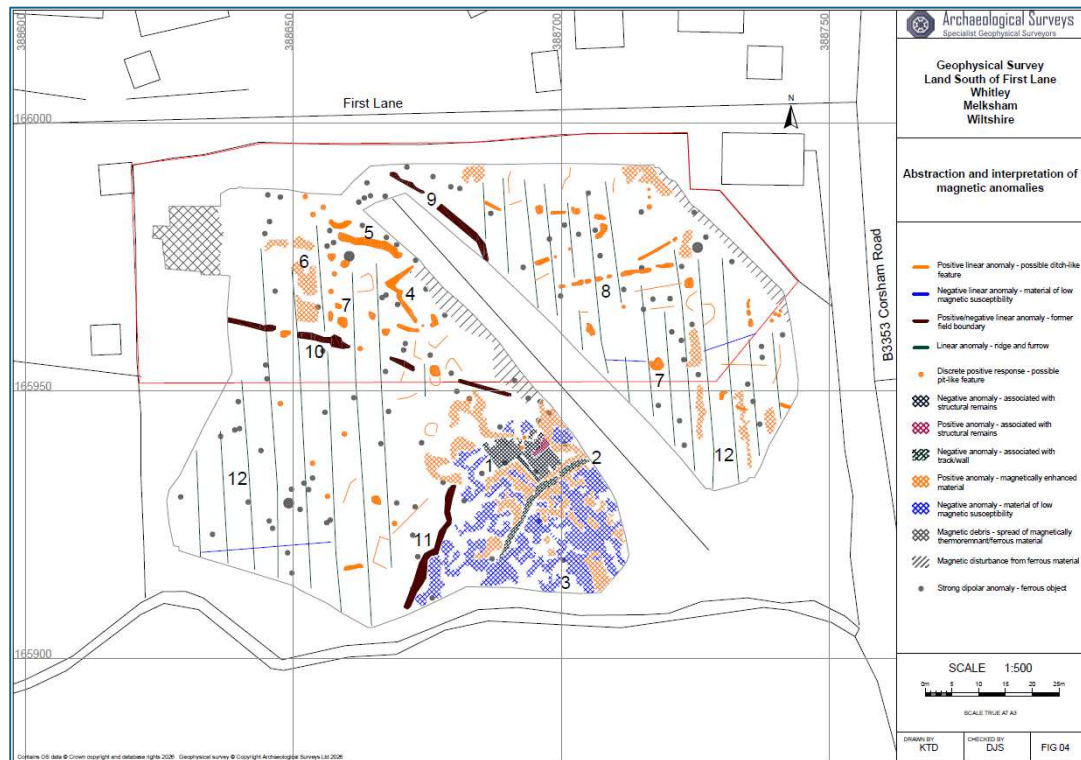


Fig. 4 Geophysical survey interpretation plot, application site outlined in red. OS PMCL AC0000855630

Archaeological Evaluation (Fig. 5)

- 3.8 A site-specific trial-trench archaeological evaluation was subsequently undertaken by Avon Archaeology Ltd in August 2026, targeting the potential features identified by the Magnetometer survey within the area of the proposed new house plots, in accordance with the advice given in the Council's pre-application response (AAL 2026). Most of the identified geophysical survey anomalies correlated with modern land drains. In Trench 2 a ditch containing a few sherds of late medieval pottery was found. This appeared to have been re-opened in the post-medieval period but may have been infilled again before the middle of the 19th century as it does not appear on the tithe map. An amount of iron slag, including a furnace bottom, were found in the secondary fill of the ditch (deposited before it was recut), with the furnace bottom pushed into the upper surface of the fill. Its provenance is therefore unclear, and the furnace bottom was not from a sealed context, but all of the slag material had clearly been re-deposited from elsewhere and there was no evidence for *in situ* ironworking or any other archaeological activity within the application site. The site's archaeological potential is therefore considered low, and no further archaeological investigation is considered necessary.



Fig. 5 Archaeological trench location and feature plan, application site outlined in red.

OS PMCL AC0000855630

Historic Map Regression

- 3.9 The Melksham tithe map (Fig. 6) indicates the application site forming parts of parcels 973, 1073 and 1078. Parcel 1073 in the south west was described as an orchard which formed part of Lagard Farm, owned by Thomas Jeffrys and occupied by Thomas Collett. The extent of the land occupied by the farm is plotted over the tithe map at Figure 6 below. Plot 973 is identified in the apportionment along with 974 to the south and 969 to the north (the Grade II listed buildings at 120-122 First Lane) as 'sundry houses, cottages, gardens and small plots of land' and indeed domestic dwellings are shown coloured in carmine within both of these plots (emphasised in the map below along with the buildings then forming Lagard Farm). These and plot 1078 are all identified as having 'sundry proprietors' and 'sundry occupiers' and there is therefore no further detail on the tenure for these properties. The since-removed field boundary between 1073 and 1078 can clearly be seen as a pale mark crossed by the north/south ridge and furrow in the LiDAR hillshade analysis at Figure 3 above.

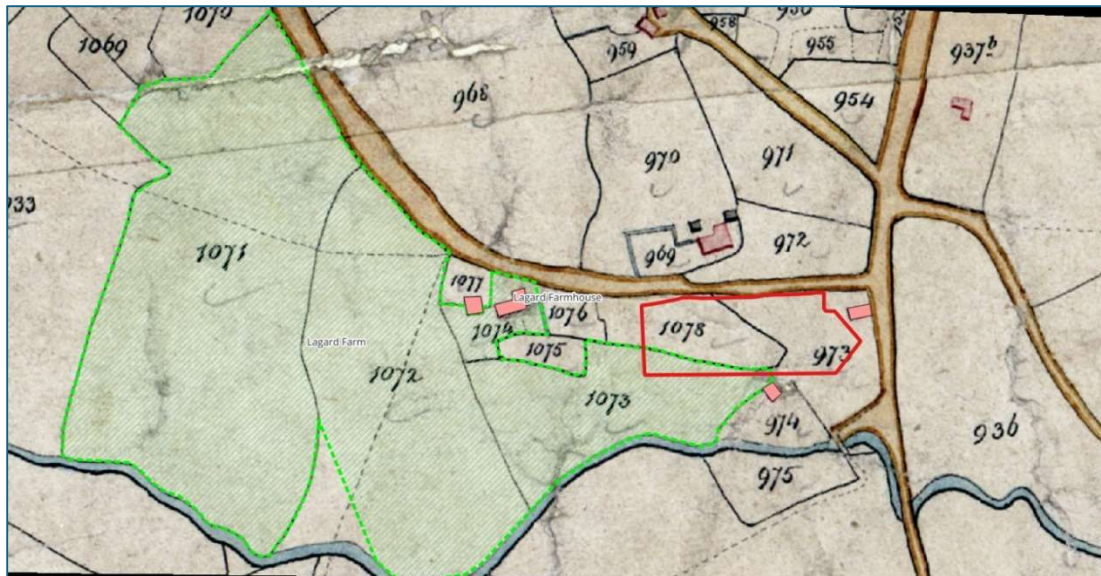


Fig. 6 Extract from Melksham Parish Tithe Map, showing the extent of Lagard Farm at that date hatched in green. OS PMCL AC0000855630

- 3.10 The property shown in parcel 973 at the tithe map does not appear in the 1886 First Edition map (Fig. 7), which shows a building here of similar size but clearly tucked neatly into the corner of the junction between First Lane and the Corsham Road (the location of the present 78 First Lane). The building in parcel 974 is still evident, as is the triangular parcel of land to the south of it defined by trackways on two sides with a well shown in the southeast. The triangular land parcel on both maps corresponds well with earthworks discernible in the LiDAR hillshade at Fig. 3. A new north/south boundary at the western edge of the present application site in 1886 (Fig. 7) appears to form the western boundary of the north/south ridge and furrow evident on Figure 3, suggesting that the ridge and furrow post-dates the tithe map and is most likely of mid-to late-19th-century date. This would appear to accord with the evidence from the site-specific archaeological evaluation, with the ridge and furrow overlying the post-medieval recut of the possibly late medieval ditch in Trench 2. The existing part-culverted water course through the site appears to have been either created or - perhaps more likely - straightened at the same time, as only the south-eastern part of it corresponds to the eastern side of parcel 974 on the tithe map, the part to the northwest being a more recent creation. The ridge and furrow appears to respect and post-date the water course, with that in the eastern parcel of land thus created seen to be noticeably narrower at Figure 3.

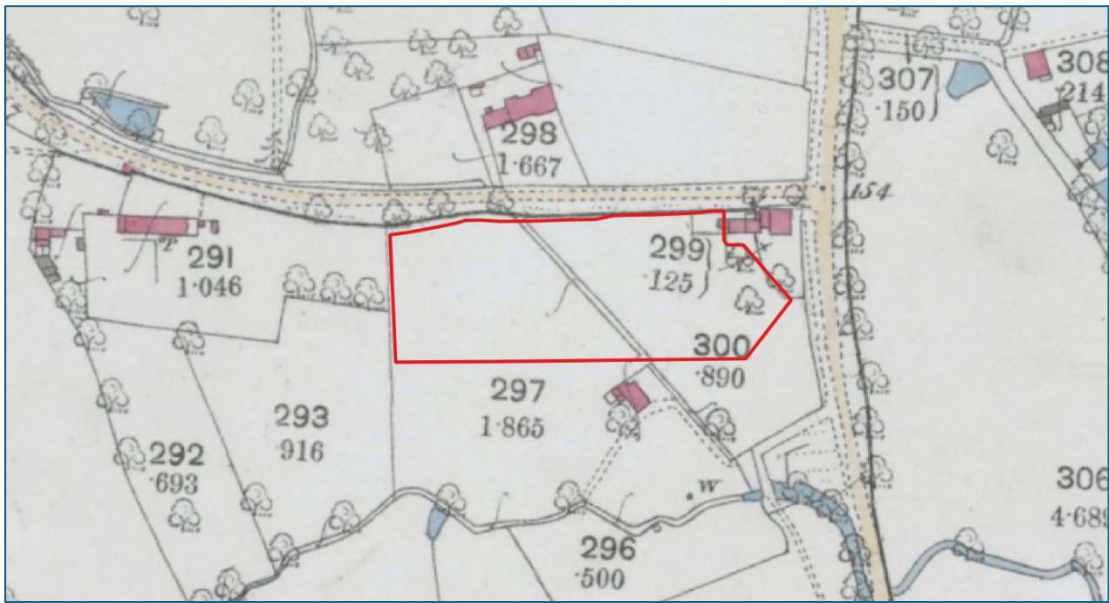


Fig. 7 Extract from 1886 First Edition Ordnance Survey. OS PMCL AC0000855630

- 3.11 The main change between the 1886 (Fig. 7) and 1901 (Fig. 8) maps is the disappearance of the dwelling and associated trackways shown to the south of the application site (tithe parcel 974). Another well is shown to the northeast of 78 First Lane. An L-shaped building has been constructed to the northwest of Lagard Farmhouse.



Fig. 8 Extract from 1901 Ordnance Survey. OS PMCL AC0000855630

- 3.12 Between the maps of 1901 (Fig. 8) and 1924 (Fig. 9) a new field parcel is shown within the former area of tithe parcel 974 to the south of the application site, the western and northern extents of which are clearly defined in the LiDAR hillshade at Figure 3 above. Two small outbuildings are shown directly to the west of the application site boundary

for the first time; the derelict remains of the southern structure were still evident during the author's site visit. The property on the site of 78 First Lane also appears slightly reconfigured.



Fig. 9 Extract from 1924 Ordnance Survey. OS PMCL AC0000855630

- 3.13 By 1942 (Fig. 10) the field layout directly to the west of the application site had been modified and an orchard is depicted directly west of the application site, between it and Lagard Farmhouse. The building on the site of what is now 78 First Lane had been reconfigured again and by 1942 is identified as a Post Office. New properties had been built to the east of the listed buildings at 121-122 First Lane.

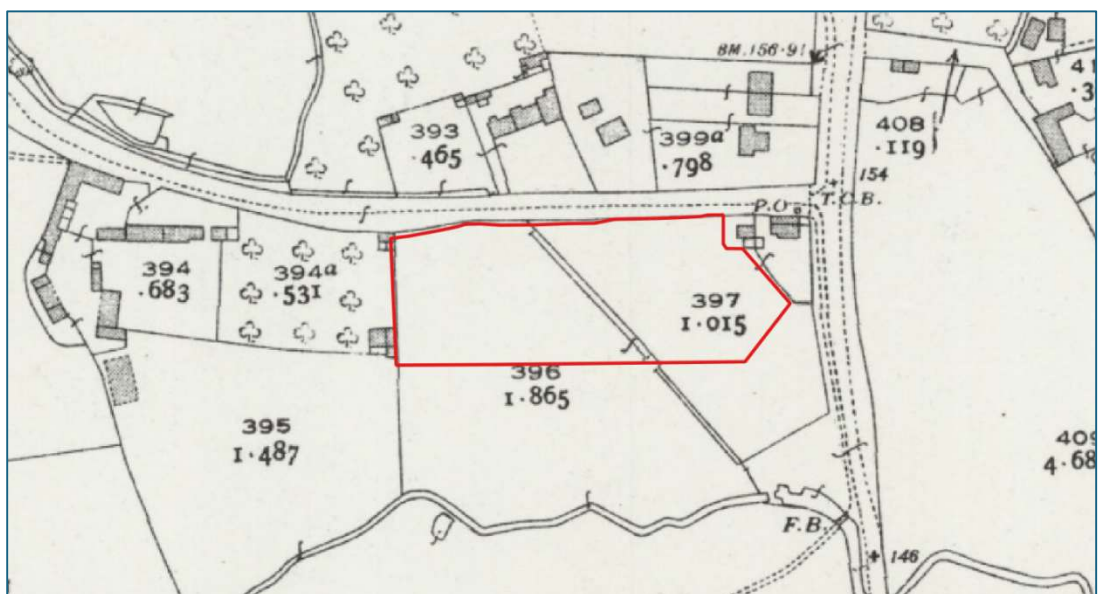


Fig. 10 Extract from 1942 Ordnance Survey. OS PMCL AC0000855630

- 3.14 Changes between 1942 (Fig. 10) and 1973 (Fig. 11) were substantial, with a large amount of housing built to the north of First Lane, including properties to the west of the listed buildings at 121-122 First Lane and north of the application site. Most of this development post-dates the 1960 Six-Inch map (not illustrated). The orchard to the west of the application site was still present in 1973, and the outbuildings adjacent to the western boundary with the application site had been slightly enlarged. The Post Office shown on Figure 10 on the site of the present 78 First Lane had been reconfigured again by 1973, by when it was no longer shown as a Post Office, but instead numbered '76'. High voltage power lines carried by pylons were evident to the south of the brook south of the application site for the first time (not shown in 1960).

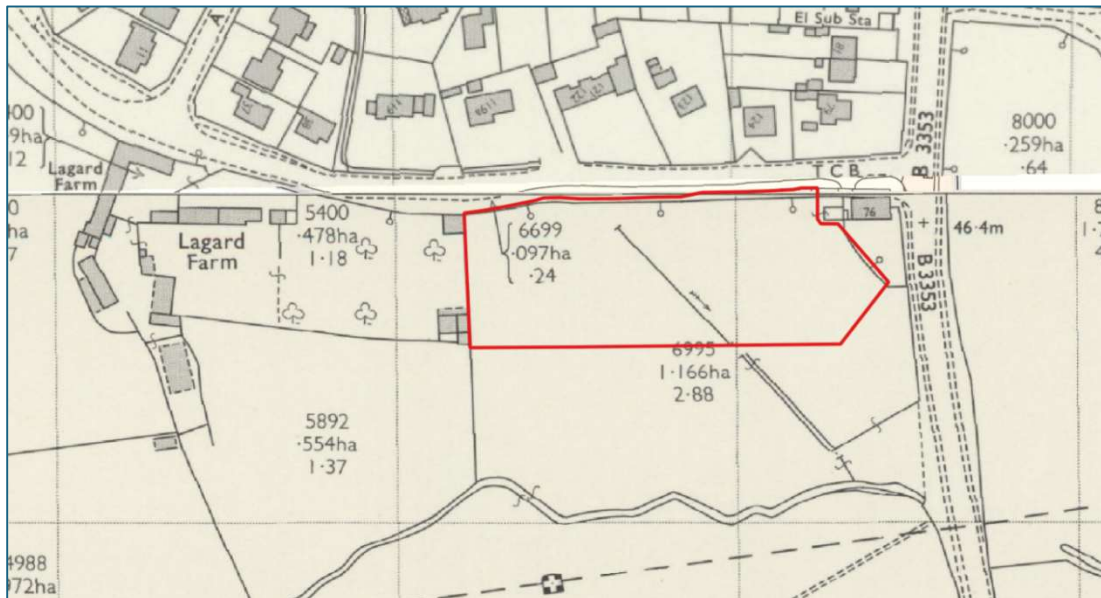


Fig. 11 Extract from 1973 National Grid 1:2500 map. OS PMCL AC0000855630

- 3.15 The main change between the 1973 map and 2002 Google Earth coverage (not illustrated) is the construction of a single-storey building directly to the east of Lagard Farmhouse. Planning permission was granted in 1984 for 'erection of a domestic outbuilding for vehicular parking bays and fuel store' (Ref. W/84/00801/FUL). Permission was granted in 2019 to convert this existing garage building into holiday let accommodation with parking and an amenity area (Ref. 19/05433/FUL). This conversion has introduced domestic windows and doors into a building which previously had no windows facing the application site. This building can be seen between Lagard Farmhouse and the application site on Figure 12 below.



Fig. 12 Extract from 2023 Google Earth satellite coverage. OS PMCL AC0000855630

4. SIGNIFICANCE ASSESSMENT (FIGS 13-20)

Heritage assets and their level of significance

- 4.1 The NPPF (2026) defines Significance (for heritage policy) as being ‘*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*’. One of the key lessons from this is that, in assessing value, we need to consider the future along with the present and try to determine what will be regarded as being of value in the future.
- 4.2 The NPPF defines heritage significance in terms of a package of four headline heritage interests or values – namely:
- Archaeological;
 - Architectural;
 - Artistic; and
 - Historic
- 4.3 In terms of built heritage, these are the intrinsic components of significance, vested largely in the fabric, fixtures and fittings of a building, along with documentary

evidence which attests its history. The NPPF defines a further, extrinsic component of heritage significance: the contribution setting makes to the significance of an asset.

- 4.4 In its 2019 Advice Note 12 '*Statements of Heritage Significance: Analysing Significance in Heritage Assets*' (HE 2019), Historic England [its page 16] has clarified and advised that, in setting out an assessment of significance for a heritage asset, heritage statements should describe significance in terms of the NPPF package of interests or values, as opposed to the alternative values package (evidential, aesthetic, historical and communal) set out in English Heritage's 2008 *Conservation Principles*):

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

Archaeological interest

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

Architectural and artistic interest

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

Historic Interest

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

[Setting]

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

[HEAN 12, 2019. Additional [setting] heading added by the author for clarity]

4.5 Thus, this statement will adopt the latest NPPF terminology and recommended approach from Historic England's 2019 Advice Note 12 in describing the significance of potential receptor assets below.

4.6 In order to quantify the relative importance or significance of heritage assets here (as required at Planning Practice Guidance Paragraph: 008 Reference ID: 18a-008-20190723) – in other words to provide a 'hierarchy' of significance – the following hierarchy of significance table has been adapted for this assessment from ICOMOS's *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* (ICOMOS 2011), to take into account the latest iteration of the National Planning Policy Framework (2026). The ICOMOS guidance was devised as a robust and defensible system for assessing/evaluating heritage significance and impacts.

Table 1 Hierarchy of significance of heritage assets

Grading	Description
Very High	World Heritage Sites; Assets of acknowledged international importance; Assets that can contribute significantly to acknowledged international research objectives; Historic landscapes of international value (designated or not) and extremely well-preserved historic landscapes with exceptional coherence, time depth, or other critical factor(s). Other buildings or urban landscapes of recognised international importance.
High	Scheduled Monuments and undesignated assets of Schedulable quality and importance; Grade I and II* Listed buildings (Scotland category A); Other Listed buildings that can be shown to have exceptional qualities in their fabric or associations not adequately reflected in their Listing grade; Conservation Areas containing very important buildings; Undesignated structures of clear national importance; Designated and undesignated historic landscapes of outstanding historic interest (including Grade I and Grade II* Registered Parks and Gardens); undesignated landscapes of high quality and importance of demonstrable national value; and well preserved historic landscapes exhibiting considerable coherence, time depth or other critical factor(s); Assets that can contribute significantly to acknowledged national research objectives. Also includes non-designated heritage assets which are demonstrably of equivalent significance
Medium	Designated or undesignated assets that contribute to regional research objectives; Grade II (Scotland category B) Listed buildings; Historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical association; Conservation Areas containing important buildings that contribute significantly to their historic character; Historic townscapes or built up areas with important historic integrity in their buildings, or built settings (for example including street furniture or other structures); Designated landscapes of special historic interest (including Grade II Registered Parks and Gardens); undesignated landscapes that would justify such a designation; averagely well-preserved historic landscapes with reasonable coherence, time depth or other critical factor(s); landscapes of regional value.
Low	Designated and undesignated assets of local importance including those compromised by poor preservation and/or poor survival of contextual associations; Assets of limited value, but with potential to contribute to local research objectives; Locally Listed buildings (Scotland category C(S) Listed Buildings) and historic (unlisted) buildings of modest quality in their fabric or historical association; Historic townscape or built-up areas of limited historic integrity in their buildings or built settings (for example including street furniture or other structures); Robust undesignated historic landscapes; historic landscapes with importance to local interest groups; and historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations. Archaeological remains, buildings and other elements of the historic landscape which have a degree of significance meriting consideration in planning decisions, due to their heritage interest

Grading	Description
Negligible	Assets with very little surviving archaeological interest; Buildings of little architectural or historical note; Landscapes with little significant historical interest.
Unknown potential	Archaeological remains whose importance has not been established. Buildings with some hidden (i.e. inaccessible) potential for historic significance.

4.7 The assets identified at Section 2 for significance assessment due to potential effects of the proposed development upon their settings are:

- i. 120 First Lane, NHLE 1194727
- ii. The Malt House, 122 First Lane, NHLE 1021766, and;
- iii. Lagard House, First Lane, NHLE 1194703

The significance of i) and ii) 120 First Lane and The Malt House, 122 First Lane

4.8 This terrace of cottages has a shared setting and appears to be a contemporary grouping, so is assessed as one group here.



Fig. 13 The terrace of listed cottages at 120-122 First Lane on the left of the view, application site behind the hedged- and treed-boundary to the right of the road. OS PMCL AC0000855630

4.9 The listing description for 120 First Lane, NHLE 1194727 reads:

Two cottages, now one. Late C17. Rubblestone with stone slate roof and ashlar axial stack. T-plan. 2 storeys, 3 windows. Doorways to right and left have elliptical arched heads and C20 doors. Windows are 3-light ovolo, 3-light beaded and 2-light beaded mullions. First floor has two 2-light ovolo mullioned windows and one C19 window

case. Rear has gabled wing with C20 copied mullioned windows. Interior not inspected.

- 4.10 The listing description for The Malt House, 122 First Lane, NHLE 1021766 reads:

Cottage. Late C17. Rubblestone, stone slate roof with hipped projecting gable roof. Ashlar stack to left. T-plan. 2 storeys, 2 windows. Central door in stone flat roofed porch with bull's eye window; door has margin glazing bars. 3-light ovolo mullioned window with drip mould to left and on projecting wing to right. First floor has same 3-light windows. Rear has door with moulded architrave and flat hood, sashes and a C20 extension. Interior not inspected. (Unpublished material of Wiltshire Buildings Record)

- 4.11 The cottages are shown as attached properties on the tithe map and as a terrace of three cottages by 1901. They are set well back from the road and on an angle to the north side of First Lane. They are part of a small number of houses and cottages set in their own small plots of land, with orchards to the north, west and south, from the mid- to late-19th century. Their significance, and the reason for their Grade II listing, is primarily vested in their architectural and historical values as good examples of surviving vernacular buildings of the late 17th century. Their setting is quite tightly defined by a sense of enclosure: by 20th-century housing to the north, east and west; their well-treed/hedged and planted front gardens to the south; their low stone boundary walls to First Lane, and; the well-treed and hedged northern boundary of the application site (some evergreen, some deciduous), defining the enclosure of their setting to the south.

- 4.12 Gaps in the trees at the northern application site boundary permit occasional glimpsed views through from the cottages through to the open fields of the application site and across South Brook towards Shaw (Figs 14-17). The extent of available views out from the cottages will vary seasonally depending on leaf cover in their front gardens and the treed boundary to the application site, with some views over or through the trees to the spire of the Grade II* Christ Church at Shaw. Overall, the cottages are of medium heritage significance in accordance with the criteria at Table 1, meriting their Grade II status, with most of their significance vested in their architectural and historical value. Their generous, well-planted gardens, set back from the road, and the tree-lined road itself provide them with a pleasant rustic setting which makes a modest contribution to overall significance. The application site provides occasional glimpsed views across open fields beyond which will vary in availability seasonally

and typically terminate with Mavern Care Home on the rising ground to the south (Fig. 17), with occasional, tree-filtered glimpsed views of the spire of the Victorian, Grade II*, Christ Church in Shaw probably available from upper floor windows. The application site itself makes only a very limited contribution to the overall heritage significance of the cottages derived from their settings and is not an area from which their architectural or historical significance can be appreciated.



Fig.14 The terrace of listed cottages at 120-122 First Lane (position marked with yellow lines) seen behind the hedged- and treed-boundary from the western half of the application site (Plot 1). OS PMCL AC0000855630



Fig.15 The terrace of listed cottages at 120-122 First Lane (position marked with yellow lines) seen behind the hedged- and treed-boundary from the eastern half of the application site (Plot 2). OS PMCL AC0000855630



Fig.16 View in gap through hedge across application site from outside 120 First Lane, view terminating with Mavern Care Home in Shaw. OS PMCL AC0000855630



Fig. 17 View back towards the listed cottages looking north from the public right of way (MELW79) south of South Brook. OS PMCL AC0000855630

The significance of iii) Lagard House, First Lane, NHLE 1194703

4.13 The listing description for Lagard House, First Lane, NHLE 1194703 reads:

House. Early C18. Rubblestone with stone slate roof and coped verges. Ashlar stacks to ends and centre. 2-storey, 3 windows. Door in gabled porch to right has beaded architrave, 3-light beaded mullioned windows either side and C20 timber 5-light casement to left. First floor has two 2-light beaded mullioned windows and one 3-light to left. Left has blocked door to right of 5-light window. Windows to rear are same beaded mullions. C19 extension to left has tiled roof. Interior not inspected. A slight change in the roof line suggests that this is a building of at least two phases.



Fig.18 View of Lagard House (left) from First Lane, looking south west. OS PMCL AC0000855630

- 4.14 Its significance, and the reason for its Grade II listing, is derived primarily from its architectural and historical values as a well-preserved example of a traditional 18th-century farmhouse in the local vernacular. Clearly, as a farmstead, it derived significance from its associated historic setting of open fields and orchards, the extent of which at the time of the Melksham tithe map has been plotted on Figure 6 above. The tithe map and HER indicate that Lagard House was formerly the farmhouse of Lagard Farm, owned by Thomas Jeffrys and occupied by Thomas Collett. To the west and southwest it had two parcels of pasture (1071 'Hancocks' and 1072 'Home Ground'). Parcel 1073, to its south and southeast, was an orchard. Later, in 1942 and again in 1973, an orchard was shown directly to the east of the farmhouse, in the area now occupied by the single-storey former garage building converted to a holiday let in 2019.
- 4.15 Most of the farm's historic setting is characterised by the open, undulating pasture fields which are still in evidence and well preserved to its west and southwest, with now-denuded orchards occupying parts of the fields more immediately to its south and east at different times. To the north of the farmhouse, First Lane curves away from its initially straight east/west course to the farmhouse from the junction with the Corsham Road, turning to the northwest, but the farmhouse is aligned east/west with no windows in its eastern gable end, such that its principle views out are to the north and south. The single-storey former 1980s garage building, now a holiday let, also limits views to/from the building from the east to its blank gable end with single-storey

addition (Fig. 19). The best views of the farmhouse are therefore those of its principal elevations obtained from First Lane, to the immediate north (Fig. 18), and from within the garden and fields directly to the south of the house (Fig. 20). Overall, the farm's historic setting is well preserved and makes a good contribution to its significance, albeit with some enclosure of the farmhouse by buildings in the 20th century.



Fig.19 View from the western half of the application site (Plot 1) looking west towards Lagard House (marked with yellow lines), the single-storey holiday let seen in the middle ground. OS PMCL AC0000855630



Fig.20 View of south elevation of Lagard House looking north from the public right of way (MELW79) to the south of South Brook, application site marked with red lines. OS PMCL AC0000855630

- 4.16 Only a small part of the application site, at its southwestern corner, was historically associated with the farm, forming part of the orchard in tithe parcel 1073 (Fig. 6). Intervisibility of this land with the farmhouse was historically limited by this orchard

and the later orchard present from at least 1942-1973, but in any event is now interrupted by the single-storey holiday let and a derelict outbuilding (Fig. 19), such that the application site does not form a part of the farmhouse's setting which contributes meaningfully in any way to the heritage value it derives from setting. Nor is it an area from which the architectural or historical significance of Lagard House is typically or best appreciated.

- 4.17 Overall, Lagard House is of medium heritage significance in accordance with the criteria at Table 1, meriting its Grade II status, with most of its significance vested in its architectural and historical values. Its historic setting of undulating pasture fields to the west and southwest is well preserved and this is the most important element of its setting that contributes to its significance. The historic orchards it once possessed to the south and east are now denuded and this part of its setting makes a weaker contribution. The majority of the application site, to the east of the listed building, was not historically part of Lagard Farm. The site does not feature in any key views out from the farmhouse and intervening built form and vegetation and the orientation of Lagard House mean that the heritage significance of the listed building is not readily appreciable from within the application site. The rural historic setting of farmland associated with the listed building therefore makes a strong contribution to the overall heritage significance of Lagard House, but the application site does not form a component of that setting that contributes to, or enables appreciation of, its significance.

5. HERITAGE IMPACT ASSESSMENT (FIGS 21-22)

Development proposals

- 5.1 The proposed development features two self-build houses in L-shaped plots set back from First Lane and accessed from the lane in a location close to the existing field gate at the northwest of the site. A swale is proposed around the western and southwestern boundary, with green buffer zones around the edges of the site for open space and ecology.



Fig. 21 Illustrative masterplan of proposed two-dwelling self-build development. OS PMCL AC0000855630

Assessment of potential development impacts

Archaeology

- 5.2 Although the 2026 archaeological evaluation identified a ditch which contained a few fragments of late medieval pottery, some ironworking slag and a bloomery furnace bottom, this ditch was isolated and the ironworking slag redeposited from elsewhere, its date and provenance uncertain. The archaeological potential of the application site

is therefore considered to be low. The development is therefore unlikely to have any impact upon significant archaeological remains, and no further archaeological work is recommended.

Built Heritage

Lagard House

- 5.3 The above analysis has established that the application site does not contribute in any meaningful way to the setting of Grade II listed Lagard House and that there is not a strong historic connection between the farm and the land within the application site. No built form is currently proposed within the small area within the southwestern corner of the site which was formerly part of an orchard belonging to the farm (most of which is taken up with the proposed Swale). There is therefore considered likely to be **no effect** on the heritage significance Lagard House derives from its setting that would result from implementation of the current development proposals. The proposals would therefore conserve the significance of the listed building in accordance with statute and national planning policy.

120 First Lane and The Malt House, 122 First Lane

- 5.4 The above analysis has established that application site itself makes only a very limited contribution to the overall heritage significance of these Grade II-listed cottages derived from their settings by providing glimpsed and tree-filtered views across open fields, terminating in the modern built form of Mavern Care Home (Fig. 16) with occasional views of the spire of Christ Church, Shaw, which views will vary in extent and availability seasonally and are probably only available from upper floor windows of the listed buildings. The site is not an area from which the cottages' architectural or historical significance can be readily discerned or is best appreciated (see Figs 14-15). The proposed two house plots will introduce a slightly increased sense of urbanisation into the currently open field character which can occasionally be glimpsed through the trees and hedges occupying the gardens of the cottages and the site boundary to First Lane, along with the modern built form of the Mavern Care Home which dominates the backdrop to those glimpsed views (Fig. 16). There is some historic precedent for development of this land for domestic occupation, with a dwelling either side of the present culvert shown on the tithe map (in Parcels 973 and 974 on Fig. 6).

- 5.5 The generous gap between the two plots and orientation of the culvert which runs through the application site on an angle - which will be retained between the proposed house plots - should enable the retention of the glimpsed and tree-filtered views of the tower of Christ Church at Shaw from upper floor windows of the cottages. Owing to the extensive planting in their front gardens and orientation and set back of the cottages from the road frontage there is no meaningful intervisibility between the cottages and the proposed site entrance even in winter months (Fig. 22), such that there is no adverse effect upon the setting of the cottages from this perspective. Overall, whilst (prior to mitigation) some new built form may be glimpsed in heavily vegetation filtered views out from the listed cottages in winter months, there would be a negligible effects upon key views from/to (and therefore appreciation of) the listed buildings and the key components of their settings. There is therefore considered to be **no effect** on the heritage significance 120-122 First Lane derive from their settings that would result from implementation of the current development proposals.



Fig. 22 view looking east along First Lane from the application site entrance back towards the listed cottages at 120-122 First Lane. OS PMCL AC0000855630

- 5.6 The generous set back of the proposed houses from the road frontage and their well-treed, large garden plots also echoes the historic character of First Lane on the north side of the road, providing an appropriate design response to the historic environment and local pattern of development which conserves the heritage significances of the listed cottages and their settings in accordance with the requirements of Section 20 of the NPPF (2026) and Wiltshire Council Policies CP57 and CP58.

Conclusion

- 5.7 Whilst the development will introduce some new built form and a slightly increased sense of urbanisation into the surroundings of the three listed buildings which might be considered to cause adverse visual effects, the above analysis has shown that these effects are slight, capable of mitigation at technical details stage, and will not affect any of the important aspects of their significance which they derive from their settings. It is anticipated the proposed development will therefore have **no effect** upon the significance of the designated built heritage, conserving both the key architectural and historical significances of the listed buildings for which they are primarily listed, and preserving the significance they each derive from their settings. The residual slight adverse visual effects upon glimpsed views out from the listed cottages at 120-122 First Lane could be mitigated at the technical details stage, if required, through consideration of building layout, scale and massing and/or through further strengthening of the planting at the northern site boundary. Implementation of the proposed development is therefore considered likely to have no effect upon significance in the historic environment, and would therefore conserve heritage significance in the historic environment, in compliance with the requirements of Section 20 of the NPPF (2026): *Conserving and enhancing the historic environment* and Wiltshire Council Policies CP57 and CP58.

6. REFERENCES

- AAL (Avon Archaeology Ltd) 2026 *Land at First Lane, Whitley Melksham, Wiltshire: Report on an Archaeological Evaluation*. **AAL Report Ref. 26-27.915**
- AS (Archaeological Surveys Ltd) 2026 *Land South of First Lane, Whitley Melksham, Wiltshire: Magnetometer Survey Report*. **Ref. no. J1077**
- EH (English Heritage) 2008 *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment*
- Historic England 2015 *Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment*. Historic England. Swindon.

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

Historic England 2019 Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets. Historic England. Swindon. Historic England

Historic England 2021 Advice Note 16: Listed Building Consent. Historic England. Swindon. Historic England

MHCLG (Ministry of Housing, Community and Local Government) 2019 Planning Practice Guidance: Conserving and enhancing the historic environment

MHCLG (Ministry of Housing, Communities & Local Government) 2026 National Planning Policy Framework (issued 12 December 2024, updated 7 February 2025)

APPENDIX 1: RELEVANT STATUTE, POLICY AND GUIDANCE

STATUTE

Scheduled Monuments

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

Listed buildings

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

Note on the extent of a Listed building

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

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

The inclusion of a structure deemed to be within the *curtilage* of a building thus means that it is subject to the same statutory controls as the principal Listed building. Inclusion within this duty is not, however, an automatic indicator of *heritage significance* both as defined within the NPPF (2026) and within Conservation Principles. In such cases, the establishment of the significance of the structure needs to be assessed both in its own right and in the contribution it makes to the significance and character of the principal Listed building. The practical effect of the inclusion in the listing of ancillary structures is limited by the requirement that Listed Building Consent is only needed for works to the *Listed building* (to include the building in the list and all the ancillary items) where they affect the special character of the *Listed building* as a whole.

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

Conservation Areas

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

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

NATIONAL PLANNING POLICY

National Planning Policy Framework (NPPF 2026, issued by MHCLG on 17 August 2026)

Definition of a heritage asset

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

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes but is not limited to designated heritage assets and assets identified by the local planning authority (including local listing).

Definition of designated heritage assets

NPPF (2026), Annex B, defines designated heritage assets as including World Heritage Sites, Scheduled Monuments, Listed buildings, Registered Parks and Gardens, Battlefields, Protected Sites and Conservation Areas designated under the relevant legislation or the UNESCO World Heritage Convention. These are formally identified on the National Heritage List for England (NHLE), which is the only official and up-to-date register of buildings and sites thus protected.

Definition of non-designated heritage assets

Non-designated heritage assets are not specifically defined in the NPPF, but by implication (and through the Planning Practice Guidance) can be taken to include monuments, buildings, parks and gardens, areas, sites, places or landscapes identified as having a degree of significance meriting consideration in planning decisions, because of their heritage interest. These are normally – but not exclusively - identified by the local planning authority through formally adopted lists of local heritage assets. Such ‘local lists’ may include monuments identified by Historic Environment Records (HERs), as well as local buildings, cinemas, heritage assets at risk and parks and gardens not nationally protected by virtue of being on the NHLE register. Assets which are not currently recorded on any local list may, nevertheless, be identified as non-designated heritage assets during the course of the planning process if they are identified through the heritage significance and impact assessment process as having a degree of heritage interest/significance meriting consideration.

Requirements for Heritage Significance and Impact Assessment

NPPF (2026) Policy HE5.1 identifies that *Development proposals affecting heritage assets should be accompanied by an assessment of the significance of the assets affected (including any contribution made by their setting) and of the potential effect of the proposal on their significance. The level of detail should be proportionate to the assets’ importance and no more than is necessary to understand the potential effect of the proposal on their significance. The relevant historic environment record should be referred to in making this assessment, and appropriate expertise employed where necessary.*

Defining Heritage Significance

NPPF (2026), Annex B, provides a definition of *significance* for heritage policy. This states that heritage significance comprises *The value of a heritage asset to this and future generations because of its heritage interest. 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.

Archaeological Interest is also defined in **NPPF (2026), Annex B**: *There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.* Regarding 'levels' of significance the NPPF (2026) provides a distinction between: *designated heritage 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' (Policy HE6.6); designated heritage assets not of the highest significance 'grade II listed buildings, or grade II registered parks or gardens' (Policy HE6.6); and non-designated heritage assets (Policy HE7).*

Securing the conservation of heritage assets

NPPF Policy HE4 sets out the decision-making requirements for the conservation of heritage assets.

NPPF Policy HE4.1 states:

*Heritage assets, as an irreplaceable resource, should be **conserved in a manner appropriate to their significance**. To achieve this, development proposals which would affect the significance of heritage assets, including any contribution made by their setting should:*

- a. Maintain or secure a use consistent with their conservation, taking into account the importance of maintaining the assets, the positive contribution they can make to sustainable communities including local economies, and the positive contribution they can make to local character and distinctiveness; and*
- b. Avoid (or if that is not possible, minimise) harm to the significance of heritage assets, and instead conserve this significance.*

NPPF Policy HE4.2 determines that:

*Any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) should have a **clear and convincing justification in accordance with the policies in this chapter**.*

NPPF Policy HE4.3 determines that:

Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the asset should not be taken into account in any decision relating to the asset.

NPPF Policy HE4.4 determines that:

Proposals for enabling development, which would otherwise conflict with other policies in this Framework and/or those in the development plan, but which would secure the future conservation of a heritage asset, should be considered on the basis of whether the conservation benefits outweigh the disbenefits of departing from the policies concerned.

Assessing effects upon heritage assets

NPPF (2026) Policy HE5.2 defines five levels of effect to the significance of heritage assets which could result from development: **positive effect** (HE5.2a); **no effect** (HE5.2b); **harm** (HE5.2c); **substantial harm** (HE5.2c); and, **total loss** of significance (HE5.2d).

HE5.2c defines the occurrence of **substantial harm** being as ‘where the development proposal would seriously affect a key element of the asset’s significance’, building upon the earlier example given in the Planning Practice Guidance (2019) Paragraph 018:

‘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’. [PPG 2019 Paragraph: 018 Reference ID: 18a-018-20190723]

Assessment of heritage impacts to designated heritage assets

NPPF (2026) Policy HE6.1 notes that *When considering the potential effect of a development proposal on the significance of a designated heritage asset, substantial weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance.*

NPPF (2026) Policy HE6.2 states *Development proposals which would have a **positive effect** on a designated heritage asset should be supported.*

NPPF (2026) Policy HE6.3 states *Any **harm** to a designated heritage asset will be a matter of considerable importance and weight, which should be dealt with in accordance with paragraphs 4 to 6 of this policy.*

NPPF (2026) Policy HE6.4 determines that *Where a development proposal would **harm** the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal. Important public benefits can include securing the long-term reuse of a vacant or underused listed building, and enabling energy efficiency and low carbon heating measures to be employed.*

NPPF (2026) Policy HE6.5 determines that *Where a development proposal would cause **substantial harm** to, or the **total loss** of, the significance of a designated heritage asset, consent should be refused unless it can be demonstrated that the harm is necessary to achieve substantial public benefits that outweigh the harm or loss, or if all of the following apply:*

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

NPPF (2026) Policy HE6.6 goes on:

Within this context, development which would cause substantial harm to, or the total loss of, the significance of grade II listed buildings, or grade II registered parks or gardens, should be exceptional; while development which would cause substantial harm to, or the total loss of, 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.*

Footnote 64 goes on to clarify that:

Non-designated heritage assets of archaeological interest that a decision-maker considers to be equivalent significance to scheduled monuments should be considered subject to the policies for designated heritage assets.

World Heritage Sites

NPPF (2026) Policy HE8 sets out the requirements for conserving the significance and Outstanding Universal Value of World Heritage Sites, including the impact assessment process.

NPPF (2026) Policy HE8.2 determines that:

Not all elements of a World Heritage Site will necessarily contribute to its significance or Outstanding Universal Value. Where a development proposal would result in the loss of a building or other element which contributes to the significance or Outstanding Universal Value of a World Heritage Site, the assessment of impact should take into account the significance and the contribution made to Outstanding Universal Value by the element affected and its contribution to the significance of the World Heritage Site as a whole, and the effects of this considered in accordance with policies HE5 and HE6.

NPPF (2026) Policy HE8.3 determines that:

Proposals that conserve those elements of a World Heritage Site or its setting, including any buffer zone, that make a positive contribution to it or which better reveal its significance, should be supported.

Conservation Areas

NPPF (2026) Policy HE9 sets out the requirements for conserving the significance of Conservation Areas, including the impact assessment process.

NPPF (2026) Policy HE9.2 determines that:

Not all elements of a conservation area will necessarily contribute to its significance. Where a development proposal would result in the loss of a building or other element which contributes to the character or appearance of a conservation area that is desirable to conserve, the assessment of impact should take into account the relative significance of the element affected and its contribution to the significance of the conservation area as a whole, and the effects of this considered in accordance with policies HE5 and HE6.

NPPF (2026) Policy HE9.3 determines that:

Proposals which conserve those elements of a conservation area that make a positive contribution to the area (or which better reveal its significance) should be supported.

Assessment of heritage harm to non-designated heritage assets

NPPF (2026) Policy HE7.1 states that *Development proposals which would have a positive effect on a non-designated heritage asset should be supported.*

NPPF (2026) Policy HE7.2 determines that *Where a development proposal would harm the significance of a non-designated heritage asset, this should be weighed against the benefits of the proposal and a balanced judgement made, having regard to the scale of any harm or loss and the significance of the non-designated heritage asset.*

NPPF (2026) Policy HE7.3 determines that *Where a development proposal would cause substantial harm to, or the total loss of, the significance of a non-designated heritage asset, it should only be supported where the harm or loss is outweighed by the benefits of the proposal, having regard to the scale of the harm or loss and the significance of the non-designated heritage asset.*

Loss or removal of heritage assets

NPPF (2026) Policy HE10 sets out requirements in respect of developments which would result in the loss of all or part of a heritage asset (whether designated or not).

NPPF (2026) Policy HE10.1 determines that:

Where a development proposal would result in the loss of the whole or part of a heritage asset (whether designated or not):

- a. The development should not be approved without all reasonable steps being taken to ensure that the new development will proceed after the loss has occurred, including through the use of planning conditions and planning obligations to secure the development against the loss of the asset; and*
- b. The applicant should record and advance understanding of the significance of the asset to be lost in a manner proportionate to its importance and the potential impact upon it; and should make this evidence (and any archive generated) publicly accessible by depositing it in the relevant Historic Environment Record, and any archives with a local museum or other public depository. The ability to record evidence of our past should not be a decisive factor in deciding whether such loss should be approved.*

NPPF (2026) Policy HE10.2 determines that:

Heritage assets with archaeological interest should be preserved in situ where feasible. Where an asset cannot be preserved or managed on-site, appropriate provision should be made for the investigation, understanding, recording, dissemination and archiving of that asset, which should be undertaken by suitably-qualified individuals or organisations.

Associated guidance on harm and benefit

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

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

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

LOCAL PLANNING POLICY

Wiltshire County Council Planning Policy

At the time of updating the impact assessment for this report (August 2026) Wiltshire Council had recently embarked upon the formulation of a new local plan which is timetabled to be considered for adoption from 30 April 2029 (Regulation 39), following the introduction of the new plan-making system in March 2026 (Local Planning Regulations 2026). In the meantime, the Wiltshire Core Strategy Development Plan Document (DPD), adopted January 2015, remains the primary document detailing policy on the Historic Environment in the County. The key heritage policies from this document are detailed below.

Wiltshire Core Strategy Policy CP57

Ensuring high quality design and place shaping

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

- i. enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development and responding to local topography by ensuring that important views into, within and out of the site are to be retained and enhanced
- ii. the retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development
- iii. responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting
- iv. being sympathetic to and conserving historic buildings and historic landscapes
- v. the maximisation of opportunities for sustainable construction techniques, use of renewable energy sources and ensuring buildings and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, in accordance with Core Policy 41 (Sustainable Construction and Low Carbon Energy)

- vi. making efficient use of land whilst taking account of the characteristics of the site and the local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area
- vii. having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter)
- viii. incorporating measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area through the creation of visually attractive frontages that have windows and doors located to assist in the informal surveillance of public and shared areas by occupants of the site
- ix. ensuring that the public realm, including new roads and other rights of way, are designed to create places of character which are legible, safe and accessible in accordance with Core Policy 66 (Strategic Transport Network)
- x. the sensitive design of advertisements and signage, which are appropriate and sympathetic to their local setting by means of scale, design, lighting and materials
- xi. taking account of the needs of potential occupants, through planning for diversity and adaptability, and considering how buildings and space will be used in the immediate and long term future
- xii. the use of high standards of building materials, finishes and landscaping, including the provision of street furniture and the integration of art and design in the public realm
- xiii. the case of major developments, ensuring they are accompanied by a detailed design statement and masterplan, which is based on an analysis of the local context and assessment of constraints and opportunities of the site and is informed by a development concept, including clearly stated design principles, which will underpin the character of the new place
- xiv. meeting the requirements of Core Policy 61 (Transport and New Development).

Wiltshire Core Strategy Policy CP58

Ensuring the conservation of the historic environment

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

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

- i. nationally significant archaeological remains
- ii. World Heritage Sites within and adjacent to Wiltshire
- iii. buildings and structures of special architectural or historic interest
- iv. the special character or appearance of conservation areas

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

Distinctive elements of Wiltshire's historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced. The potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping).

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

GUIDANCE

Good Practice Advice

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

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

GPA2 sets out the requirement for assessing *heritage significance* as part of the application process. Paragraph 8 notes *understanding the nature of the significance is important to understanding the need for and best means of conservation*. This includes assessing the extent and level of significance. GPA2 notes that *a desk-based assessment will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area, and the impact of the proposed development on the significance of the historic environment, or will identify the need for further evaluation to do so*.

GPA3 – The Setting of Heritage Assets

The *setting* of a heritage asset comprises *the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral (NPPF (2024), Annex 2)*. Thus, it is important to note that *setting* is not a heritage asset: it may contribute to the value of a heritage asset.

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

- **Step 1:** Identify which heritage assets and their settings are affected;
- **Step 2:** Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;

- **Step 3:** Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
- **Step 4:** Explore ways to maximise enhancement and avoid or minimise harm;
- **Step 5:** Make and document the decision and monitor outcomes.

