

Wiltshire Council Planning Consultation Response

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Application No: PL/2026/05494 & PL/2026/05833
Taking down, strengthening and rebuilding of Grade II Listed Boundary retaining wall, which is currently at risk of collapse
Bratton House, Melbourne Street, Bratton, Westbury, BA13 4RN

Please find following comments in respect of the above application(s).

Recommendations:

☐	No comment
☐	Support in principle subject to amendments to the scheme (as set out below)
☐	Support subject to conditions (as set out below)
☐	Object (for reasons set out below)
☒	No objections

Scope of comments: the following comments relate to the built historic environment.

National Policy and guidance: From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Sections 16 (LBC) and 66 (PP) require that **special regard** be given to the desirability of preserving or listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 also requires the Council to pay **special attention** to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.

The NPPF (August 2026) sets out Government planning policy for England. Chapter 20, *Conserving and enhancing the historic environment*, recognises heritage assets as an irreplaceable resource. Heritage assets should be conserved in a manner appropriate to their significance, with harm avoided unless there is a clear and convincing justification. Decision-makers are required to apply a balanced approach, giving substantial weight to the conservation of heritage assets and weighing any harm to significance against the public benefits of the proposal.

National Planning Practice Guidance provides guidance on interpreting the NPPF.

Historic England's Conservation Principles, Policies and Guidance (2008) provides policy and guidance for the "sustainable management of the historic environment". Additional relevant guidance on the application of policies set out in the NPPF is contained within their publications:

Historic Environment Good Practice Planning Advice Note 2 – Managing Significance in Decision-Taking in the Historic Environment (2015)

Historic Environment Good Practice Planning Advice Note 3 – The Setting of Heritage Assets 2nd edition (2017)

Historic England Advice Note 2 – Making changes to Heritage Assets (2025)

“The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3” (HE GPA3) which notes that “The importance [of setting] lies in what the setting contributes to the significance of the heritage asset or to the ability to appreciate that significance.”

Local Policy: The Council’s Core Strategy Policy CP58 ‘Ensuring the conservation of the historic environment’ requires that “designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance.”

Proposal: The application is for the partially taking down, strengthening and rebuilding of Grade II Listed boundary retaining wall, which has been identified as at risk of collapse into the public realm.

Relevant planning history: NA

Issues: impact on the listed building, impact on the setting of neighbouring listed buildings, impact on the conservation area.

Information considered/provided: Policy HE5 of the NPPF requires applicants to assess the significance of any heritage assets affected by a proposal, including the contribution made by their setting, and to identify the likely effects of the development on that significance. Sufficient information should be provided to enable a clear understanding of the significance of the heritage asset and its setting, and the impact of the proposal upon it.

Decision-makers must be satisfied that assessments accurately reflect the effects on heritage assets caused by development proposals and in this case the applications are accompanied by a Heritage Statement which provides an understanding of significance, with supporting information (Structural Engineers Report) providing clear justification for the works due to the dangerous situation of the wall.

Significance of assets and contribution of setting: The NPPF defines significance 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.” Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place.

The interest may be architectural, or historic as set out in the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 S 1.

In this case the significance of the building lies largely with its historic fabric and architecture - its form, layout and architectural expression/detailing and use of high-quality design materials which have significant aesthetic and architectural interest, and which contribute to the character of the conservation area. The boundary wall and gates piers are listed in their own right (GII), dating from early C18 and later, responding to the status of the main house (GII*) and make a positive contribution to the designated heritage assets.

Assessment: The application focuses on a section of the eastern retaining wall which has developed a substantial lean/bulge. The submitted information indicates that this has arisen through a combination of age, weathering and pressure from the retained ground, resulting in a localised failure of the wall. This type of deterioration is not uncommon in substantial historic retaining walls, given their traditional construction and the range of environmental and structural pressures to which they are subject.

It is accepted that this section of the wall is failing, and its careful taking down and rebuilding is supported in principle.

A query was raised regarding the proposed method of reconstruction, which appears to involve the formation of a new retaining structure using modern construction methods, including blockwork and weep holes, with the historic stonework reinstated to the outer face to replicate the appearance of the existing wall. There was some concern that introducing a structurally stronger section of wall could alter the distribution of loads and pressures within the wider historic wall, potentially placing the adjoining traditionally constructed fabric at greater risk. This matter was raised with the Structural Engineer, who has advised that the relationship with the adjoining historic fabric has been considered and that appropriate measures have been incorporated into the design. On this basis, there is no objection to this approach in principle.

It is understood that the detailed design may need to be amended in relation to the position and arrangement of the weep holes. Such amendments are considered acceptable in principle, although the final details should be submitted and reviewed to ensure that they are appropriate to the character and appearance of the historic wall.

Concerns have also been raised regarding the potential for collapse of the wall. Temporary shoring has been designed; however, this would need to extend beyond the red line boundary and potentially onto Highway land. In these circumstances, the careful taking down of the unstable section of wall, where necessary to address an immediate risk to safety and prevent further damage to the remaining historic fabric, is considered acceptable as emergency works. Any dismantling should be limited to the minimum extent necessary, with the stone carefully salvaged, recorded and retained for reuse as part of the subsequent rebuilding works.

Summary & conclusion: The NPPF confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It makes clear that any harm to a designated heritage asset requires clear and convincing justification.

In this case the proposals will also result in considerable heritage benefits by virtue of the proposed investment in structural repair which will help to secure the stability of the wall. The requirements of current conservation legislation, policy or guidance are considered to be met and there is therefore no objection to the approval of the application.