



Donald Insall Associates
Chartered Architects and Historic Building Consultants

**Cooper Tire and Rubber Company,
Melksham, Wiltshire**

Survey of Heritage Assets and Due Diligence Report
for Cooper Tire and Rubber Company

September 2020



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Contact information

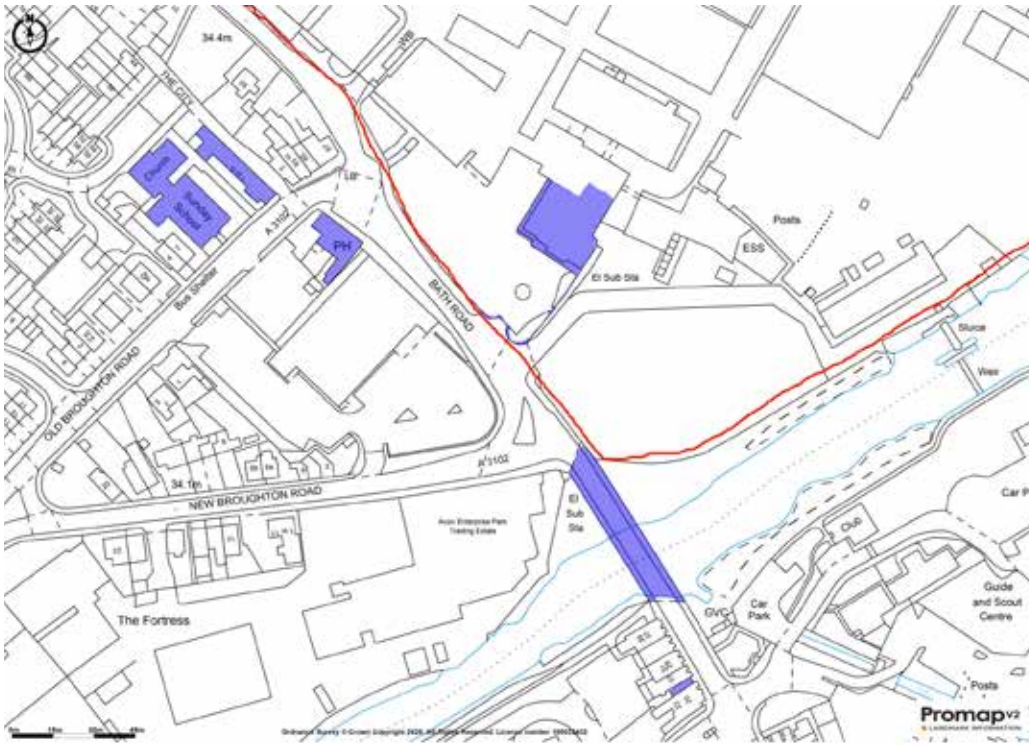
Helen Ensor IHBC (Associate Director)
E: helen.ensor@insall-architects.co.uk

Nick Wright (Research Assistant)
E: nick.wright@insall-architects.co.uk

Oxford Office
The Painted Room
First Floor
118 High Street
Oxford OX1 4BX

www.insall-architects.co.uk

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Grade II listed buildings

Site boundary

N.B. Only the south-west corner of the site is shown, in order to give due prominence to designated heritage assets

Ordnance Survey map reproduced under Licence 100020449

1.0 Summary of Heritage Asset Survey

1.1 Introduction

Donald Insall Associates was commissioned by Cooper Tire and Rubber Company in June 2020 to assist them in understanding the potential heritage significance of their Bath Road site in Melksham, Wiltshire. The site is large, covering approximately 30 acres, although it is under-used. There are no conservation areas which are affected. There is one Grade II listed building on the site – Avon House – which is also assessed as part of this report and the report also identifies a further four buildings which may be considered to have some local heritage significance and which may as a result mean that they are treated as 'non-designated heritage assets' under the terminology of the National Planning Policy Framework.

The investigation has comprised historical research, using both archival and secondary material, and a site inspection. A brief illustrated history of the site and its buildings, with sources of reference and bibliography, is in Section 2; the site survey findings are in Section 3. The investigation has established the sequence of the development of the site, and has suggested that some of the unlisted buildings may have some, limited, local heritage significance; the listed building has national importance. The significance of each of the individual buildings is set out in Section 4 and summarised below. The report concludes by indicating which buildings are of heritage value; and the extent of the significance of the listed building and its likely capacity for change.

Historic buildings are protected by law and in planning policy; the specific constraints for this site at present are summarised below. This report has been drafted as part of the client's due diligence investigations prior to determining how best to move forward in terms of either consolidating or relocating the tyre manufacturing facility.

1.2 The Site, its Buildings, and their Legal Status

The site is very large and contains a large number of buildings. Of these, one – Avon House – is listed Grade II. The site is neither within, or near to, any designated Conservation Area, although there are other Grade II listed buildings in the vicinity of the site. The site is within the planning jurisdiction of Wiltshire Council. Part of the site – Bakers Yard Car Park, which is included in the study site despite being physically separate from the main factory compound – has a lapsed planning permission for a residential unit.

Alterations to the listed building generally require listed building consent; development in conservation areas or within the setting of a listed building or conservation area requires local authorities to assess the implications of proposals on built heritage.

The statutory list description of the listed building is included in Appendix I, with extracts from the relevant legislation and planning policy documents in Appendix II.

The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision-making on applications that relate to the historic environment. Sections 16 and 66 of the Act impose a statutory duties upon local planning authorities which, with regard to listed buildings and require the planning authority to have '*special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses*'.

In considering applications for listed building consent, local authorities are also required to consider the policies on the historic environment set out in the National Planning Policy Framework 2019. At the heart of the Framework is 'a presumption in favour of sustainable development' and there are also specific policies relating to the historic environment. The Framework states that heritage assets are 'an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'. The Glossary to the National Planning Policy Framework defines a heritage asset as:

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

The Framework, in paragraph 189, states that:

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Should the owner make a planning or listed building consent application, Section 4 of this report – the assessment of significance – would meet this requirement in the planning process and is based on the research and site surveys presented in sections 2 and 3.

The Framework also, in paragraph 193, requires that:

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

The Framework goes on to state at paragraph 194 that:

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.

The Framework requires that local planning authorities categorise harm as either 'substantial' or 'less than substantial'. Where a proposed development will lead to 'substantial harm to (or total loss of significance of) a designated heritage asset', the Framework states, in paragraph 195, that:

... local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a) the nature of the heritage asset prevents all reasonable uses of the site; and

b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and

d) the harm or loss is outweighed by the benefit of bringing the site back into use.

Where a development proposal will lead to 'less than substantial harm' to the significance of a designated heritage asset, the Framework states, in paragraph 196, that:

...this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

The Framework also requires that the effect of an application on the significance of 'a non-designated heritage asset' should be taken into account in determining the application. A non-designated asset is defined as 'a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest', with non-designated heritage assets including 'assets identified by the local planning authority', such as those added to a local list. In weighing applications that affect directly or indirectly non-designated heritage assets, the Framework states, in paragraph 197, that:

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

1.4 Summary Conclusion

The Report's conclusions are set out in detail in Sections 4.0 (which identifies which buildings are or may be of heritage significance, what level of significance, and why) and 5.0 (which considers the broad implications of this heritage significance on the potential to alter and develop the site in the future) below. These sections are summarised here.

1.4.1 Avon House and Extent of Listing/ Capacity for Change

Avon House is a particularly good example of Regency architecture, and an unexpectedly assured composition. Constructed in 1817 to designs by an unknown hand, the earliest mapping evidence (the Tithe Map of 1837) shows that it was in use as two separate houses at this time; it may therefore have been built as two separate houses. The building is three storeys with a *piano nobile*, seven bays wide and constructed of Bath stone, it has a hipped roof partially concealed behind a parapet. There is a two storey, three bay wide central projection which forms (at ground floor level) the entrance, with windows recessed into arches (in a Soanian manner) whilst at first floor level, this becomes a covered loggia. All of this is of very high significance. The original windows are lost and have been replaced with modern UPVC and these detract from the building's appearance. A mid-20th century two-storey extension to the west, which extends beyond the rear of Avon House and bleeds into buildings 5 and 6 is mentioned in the list description, but in has no architectural interest and detracts from the form and appearance of the building; its removal ought to be considered a heritage benefit.

Internally the house has undergone major alterations, although the suite of rooms at the front (south) survive generally intact on all floors and are of high significance. The main staircase has been removed, and part of the rear 'hollowed out' for the modern use as the head quarters and main offices of the Avon (subsequently Coopers) rubber and tyre factory,, and these spaces detract from the significance of the building.

Attached to the rear on the eastern side, and also mentioned in the list description, is a two storey brick-faced gabled wing. A dated lead rainwater hopper says '1746' but this must have come from somewhere else – the external brickwork is later-20th century and internally it becomes clear from the surviving roof timbers and construction that the structure is 17th century and pre-dates Avon House, which must have been built against and as an addition to it. This is a surprising find, and makes the use of the site older than previously supposed; this structure is of clear architectural and historic interest, notwithstanding the degree to which it has been altered both internally and externally. It is included in the list description of Avon House, by virtue of its connectedness to the listed building and its intrinsic special interest.

To the rear (north) of this 17th century wing is a three-storey stone building. It is now physically attached to the 17th century structure, but it is clear that this was not always the case, and historically there was a gap between the two which has been filled in later, probably in the 1950s to allow the buildings to be used together. This structure is the only remaining part of a former Victorian cloth mill on the site; it pre-dates the 1837 Tithe Map and is likely to have been constructed in the first quarter of the 19th century. It is not marked separately on the plan but is the north-eastern part of building 2. Its functional relationship to the listed Avon House and the 17th-century wing to the rear of this is not clear; it is not known whether the 17th century wing was originally part of a mill complex or residential, or indeed why Avon House was built and attached to it. The former cloth mill building is probably not part of the listed structure; however, it may be that this is a point on which only a legal opinion or the advice of Historic England could provide a definitive answer. If it is not part of the listed building it is likely that it would be considered to be a non-designated heritage asset (see below).

Around Avon House to the south and east are original railings set within a stone plinth, which would be considered curtilage structures and protected by the listing.

There is considerable scope to improve the appearance, presentation and state of repair of Avon House and the attached 17th century wing. In order to understand this building, its development and the particular features of significance which remain, and perhaps most importantly compile a list of improvements, we would recommend undertaking a detailed historic building report and condition survey.

1.4.2 Potential Non-Designated Heritage Assets

We have conducted a review of all of the buildings on the site which resulted in a long-list of buildings which were found to be worthy of further consideration for their possible heritage significance. The methodology and results of this are set out in sections 3.0 and 4.0. A number of these buildings were then removed from the long list because on further examination they were considered not to be of historic or architectural interest, or not to survive well enough, leaving five structures which, in our view, could be considered to be 'non-designated heritage assets' under the terminology of the NPPF. What this means, and what impact this might have on the site's scope for change, is set out in Section 5.0 below. In summary, the buildings which in our assessment could be considered non-designated heritage assets are:

- Building 20 – the former canteen;
- Buildings 94 and 95 – part of the Victorian corn mill complex;
- Rear (northern section) of building 2 (not separately marked on the plan) – if not 'curtilage listed' (see above under 1.4.1) then historically important as the only remaining part of the Victorian cloth mill complex;
- Stone arch which is shown on the plan as spanning between buildings 2 and 95; this is not accurate and the arch is located further back into the site. The lower part of this structure is Victorian, and appears to relate to the corn mill; it appears on the 1880 OS map. As it is not physically attached to the listed building we do not believe that it is part of the listed structure, although it is likely to be considered a non-designated heritage asset. The upper part is 20th century and not of interest.
- Building 7 – a 1920s concrete-framed building; and
- Building 131 – 13 Beanacre Road, an Edwardian semi-detached house which is now a WC and shower-block.

In our view it is unlikely that any of the other buildings on the site would be considered non-designated heritage assets by the local planning authority or would warrant listing by Historic England. This is because they appear to lack either the intactness or the architectural or historic interest which would make them so. However, the process of identifying non-designated heritage assets can be somewhat opaque and ultimately the decision is that of the local authority. Therefore there is a possibility that one of the buildings on the long-list, or indeed another building on the site, could be so considered.

2.0 Historical Background

2.1 Melksham

Founded at a fording point on the river Avon in Saxon times, Melksham's name is believed to derive from 'meolc', the old English for milk, the local area long having been known for dairy farming. At the time of the Domesday survey in 1086 Melksham was a settlement of some substance, with 8 mills, and 189 landowners; in 1219 the town was granted a market charter, and medieval settlement of the town was focused on the market place and the church.

By the middle of the 14th century, Melksham was established as a weaving town, initially producing white broadcloth from wool obtained from north Wiltshire and the Cotswolds. The trade was disrupted by the Civil War in the 17th century, and recovered to an extent, but the reduced price of cloth in the 18th century made the trade less profitable, and the century was marked by industrial dispute, and the start of a gradual winding down of spinning in the town. The last of the mills closed in the 1880s, and the principal business of the town since the early twentieth century has been the manufacture of rubber products. **[Plate 2.1]**

2.2 The Site and its Buildings

The newly-named Avon India Rubber Company, moved from its previous site at Limpley Stoke to Melksham in 1890. The new rubber factory was located in the buildings of a disused steam-powered cloth mill on the west bank of the river Avon, in a part of the town known as 'The City'.

The date of the establishment of the cloth mill is unknown, but it is recorded on the tithe apportionment map of 1837 **[Plate 2.2]**. Given that it has a plot number – 673 – on the map, it is frustratingly omitted from the accompanying tithe apportionment record, but it appears to have consisted of a number of buildings built along the river bank and at right angles to it. The adjacent plots 674 and 675 are recorded as being in the ownership of the Kennet & Avon Canal Company: no. 674 was the building now known as Avon House, and included an area (perhaps an orchard) to the north of the mill site; no. 675 – actually two separate plots to the south-west and north-west of Avon House – was listed separately as 'garden'.



2.1 Melksham, from the 1810 edition of the Andrews and Dury map of Wiltshire (WSHC)



2.2 Detail from the 1837 tithe apportionment map (WSHC)

2.2.1 Avon House

The building now known as Avon House is noted in the tithe apportionment as 'Canal House'. It is not certain that there was any connection between the house and the mill at this stage, but given the proximity of the mill buildings, and the division of plot 674 by the mill site, this relationship seems likely. The house as it exists today consists of two principal historic parts, both of which would have been in existence in 1837. The Neoclassical front range of the house was reportedly built in 1817¹, possibly for Edward Weston Phillips, while a T-shaped rear range dates from the 17th century: both can be seen on the tithe map **[Plate 2.3]**. Cast lead rainwater heads that survive on the rear range have the initials 'HC' and the date '1746'. The date probably commemorates the date of the hoppers rather than the building to which they are attached; 'HC' are the initials of an owner of the building at that date, Henry Coulthurst, whose house and mill were wrecked by rioting workers in 1738: troops were sent in, and three of the rioters were later tried and executed. The style of the standing building, with its three gables, typical of the 17th century, suggests that Coulthurst repaired the damaged building rather than replacing it.

2.2.2 The Cloth Mill in the 19th Century

By the early 19th century the mill was in the hands of the Phillips family. Edward Weston Phillips, cloth manufacturer, magistrate and (in 1823) High Sherriff of Wiltshire, was one of the investors in ambitious scheme to exploit a chalybeate spring discovered just to the south of Melksham in 1770. But the plan to make Melksham into a spa resort to rival Bath had failed, and in 1830 Phillips was declared bankrupt. The following notice was published in the local newspaper:

Valuable Freehold Clothing Factory, Dye-House, Dwelling-House, and Rich Pasture Land, Melksham, Wilts. To be sold by auction ...

Lot 1. All those freehold premises, situated near the bridge in the town of Melksham, consisting of a well built clothing factory containing: 4 tiers of lofts, 66 feet by 20 feet, with an additional building attached to the lower tier steam-engine.

It was presumably by this means that the mill and house came to be in the possession of the Kennet and Avon Canal Company at the time of the 1837 tithe apportionment map. The Phillips's interest in Melksham was at that time apparently limited to the large field to the north of the mill, listed as belonging to Edward Phillips, and 'Home Ground' to the north of that, the property of John Phillips. Edward and John were likely the two sons of Edward Phillips.

However, by the time of the 1851 census the mill was once again in the hands of the Phillips family². There are two separate entries in the census returns for Avon House. The first lists 87-year old Elizabeth Phillips (widow of Edward Phillips) as head of the household, with Phoebe Bliss, her companion, and a servant. The second lists her son, Edward Phillips (retired wool dyer, aged 63) and his wife, Sarah, plus two children and a servant. One of the two children, Edward Weston Phillips, is listed a 'broad cloth manufacturer'. Meanwhile, 'Avon Factory' is shown as being inhabited by Elizabeth's younger son, John Ledyard Phillips, 'Justice

1 *Historic Town Trail of Melksham*, Melksham and District Historical Society, p. 8.

2 It is listed in the 1844 *Pigot's Directory* as being the premises of 'Phillips and Smith'.



2.3 Engraving of Avon House. from Melksham Guide, 1817.



2.4 A photograph taken from Melksham bridge circa 1910 showing the cloth mill buildings along the Avon. (Andy York)

of the Peace, Deputy Lieutenant for the County of Wilts and Cloth Manufacturer', his wife, Sarah, and two servants. The Phillips family were all practising Baptists.

Kelly's Directory for 1855 lists the mill as being in the hands of Phillips, Smith & Co, Edward Phillips Esquire, as resident at Avon House, and John Ledyard Phillips at Avon Terrace. Edward Weston Phillips is listed as a wholesale tea dealer. It is not clear from these records who precisely who lived where, but the first edition of the 25 inch Ordnance Survey map, surveyed in 1885, shows Avon House divided into at least two parts. It is probable that for at least part of the 19th century the Neoclassical front range of the building was divided into two, while the 17th century rear range comprised a third dwelling.

By the time of the 1871 census Avon House (or a part of it) was occupied by Caroline Matravers, a widow. John H Matravers (her son) had taken over the mill at some time between 1861 and 1871 (the census returns for the former date show him as being in business in nearby Westbury). Under the management of the Matravers family the mill would become the last of Melksham's cloth mills. In 1881 it employed 126 hands.

2.2.3 The establishment of the rubber factory

In 1888 the mill closed and the site and buildings were sold to the Avon Rubber Co. Avon House, however, did not at that date become part of the factory: in 1891 Caroline Matravers was still living there, with her daughters, Mary and Lucy [Plate 2.4].

Comparison of the second edition OS map, surveyed in 1899, with the first edition, surveyed in 1885, reveals minimal changes to the mill during its first decade as a rubber factory: besides the filling in of a small open area between two buildings, the foot print of the site was the same [Plate 2.5][Plate 2.6]. The third edition map, surveyed in 1922, by contrast, shows that in the first two decades of the 20th century – perhaps partly in response to the huge spike in demand for the company's products caused by the First World War – the manufacturing facilities on the site had greatly expanded to the north and north east [Plate 2.7]. The 19th century mill buildings along the Avon gave way to a new range of modern factory sheds, leaving the mill building to the north of Avon House (the northern part of **Building 2**) the last substantial part of the 19th century mill to remain. Between the new sheds and the old mill building a tall concrete building (**Building 7**) was erected *circa* 1920..

At the same period a further range of buildings was erected to the west, plus various other buildings to the north-west. The pre-1922 sheds were characterised by clerestory roofs with curved tops: portions of **Buildings 5/6** and **17** and portions of **Building 18/19** survive from this phase [Plates 2.8-2.11].



2.5 Detail from the first edition 25 inch OS map, published in 1886. (National Library of Scotland)



2.6 Detail from the second edition 25 inch OS map, published in 1901. (National Library of Scotland)



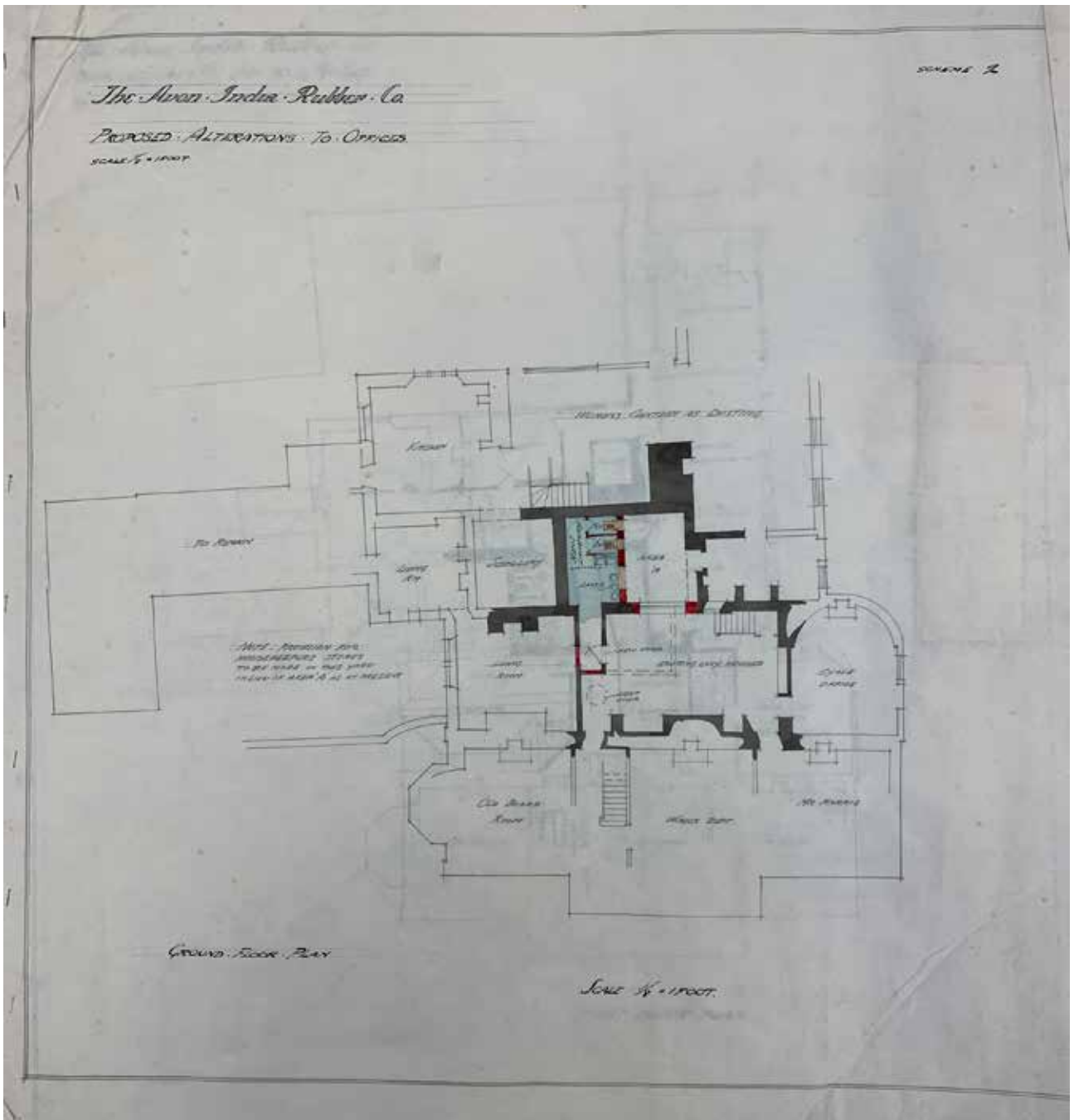
2.7 Detail from the third edition 25 inch OS map, published in 1924. (National Library of Scotland)



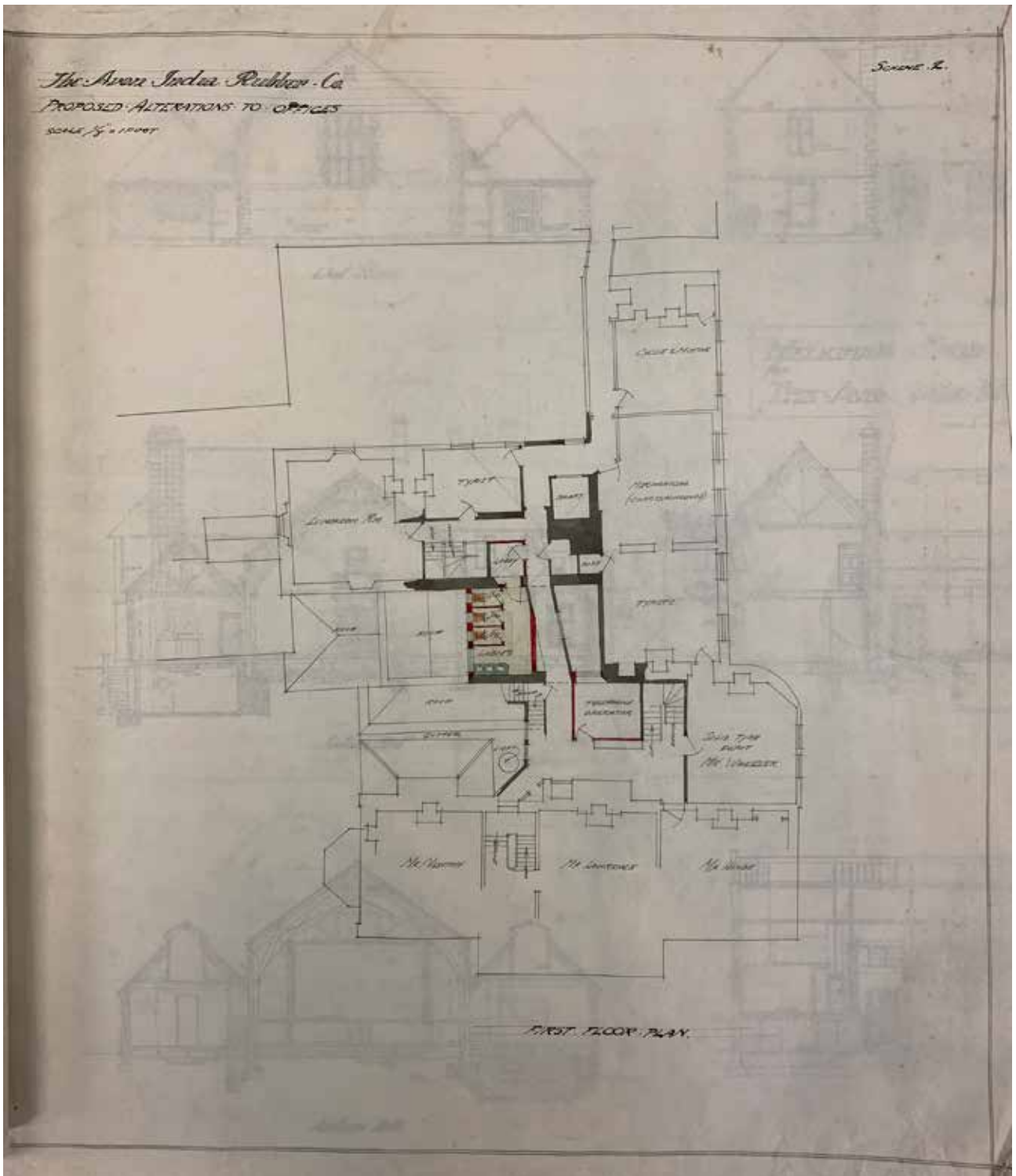
2.8 The factory from the Bath Road, circa 1914, showing Avon House and new buildings to the west. (Andy York)



2.9 A mid-20th century photograph illustrating flooding of the Avon, showing the early 20th century buildings along the river, replacing those seen in 2.4. (Andy York)



2.10 Ground floor plan showing proposed new houses for Avon House, 1926. (WSHC)



2.11 1926 first floor plan showing proposed new lavatories for Avon House, within the building as it then stood. (WSHC)

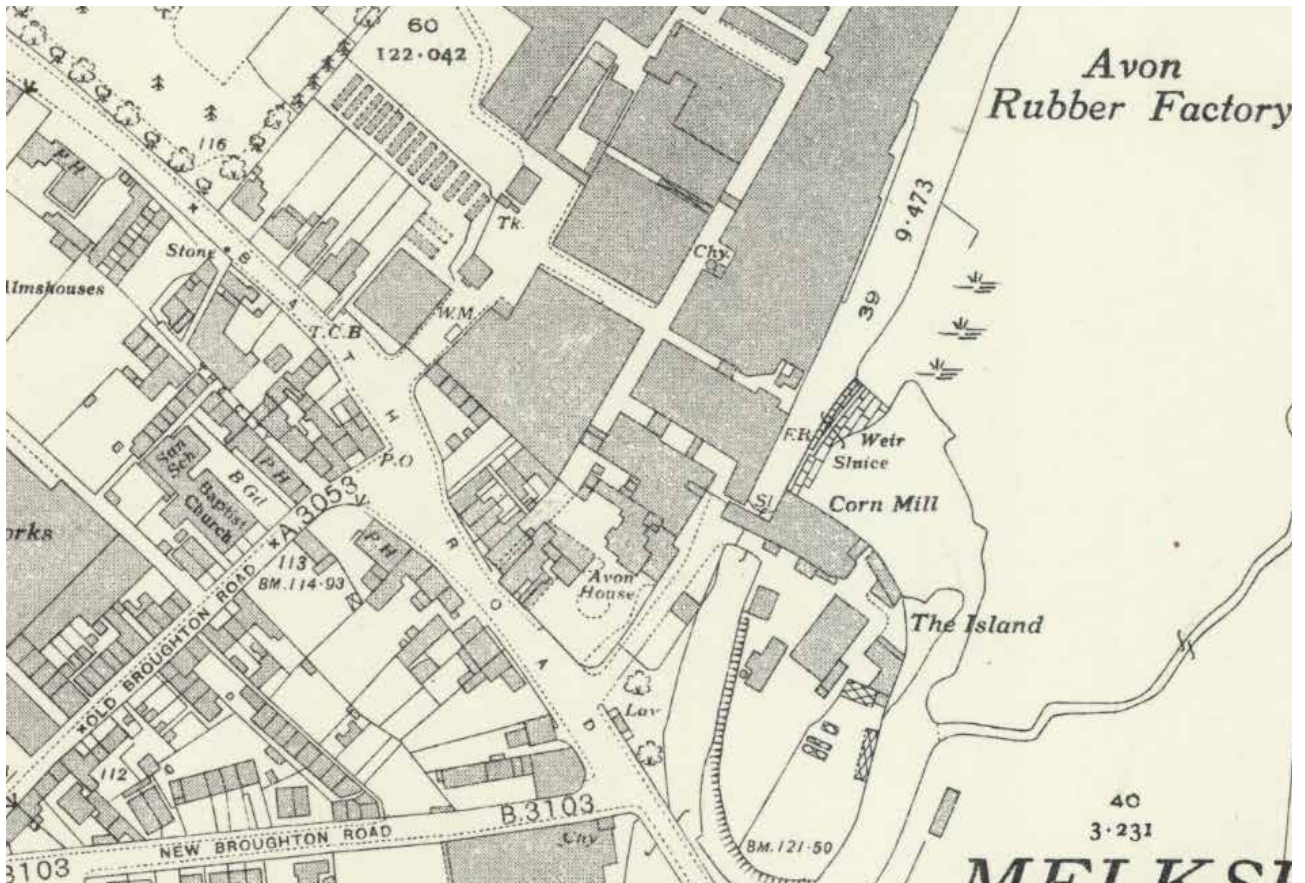
At the top of the site a new road – Scotland Road – was laid out between Beanacre Road and the river, where a foot-ferry connected with a new causeway across the flood plain on the eastern side of the river [Plate 2.12]. Scotland Road was developed by the Avon Rubber Co. with residential houses. At the beginning of the century, new houses had also been built along Beanacre Road, including **Building 131**, which was constructed *circa* 1905.

The next edition of the 25 inch OS map, surveyed in 1942 reveals significant further development, with further new buildings on the west side of the site, including a multi-storey concrete-framed finished goods store at the north of the site, fronting onto Scotland Road [Plate 2.13]. This building was attached to an earlier three-storey, flat-roofed concrete building *in situ* by 1933. Between that building and a large single-storey flat-roofed building already in existence by 1922 the first 'north light' sheds on the site were erected in the early 1930s.

In 1940 a new staff canteen (**Building 20**) was built by F.J. Amery & Sons on an empty plot on the Bath Road, to plans drawn up and approved in 1938. Initially one-storey only, the Art Deco-style building was enlarged with a second storey in 1942. Plans in the Wiltshire and Swindon History Centre credit no architect, and it was likely that the building was designed in-house [Plates 2.14-2.15a].



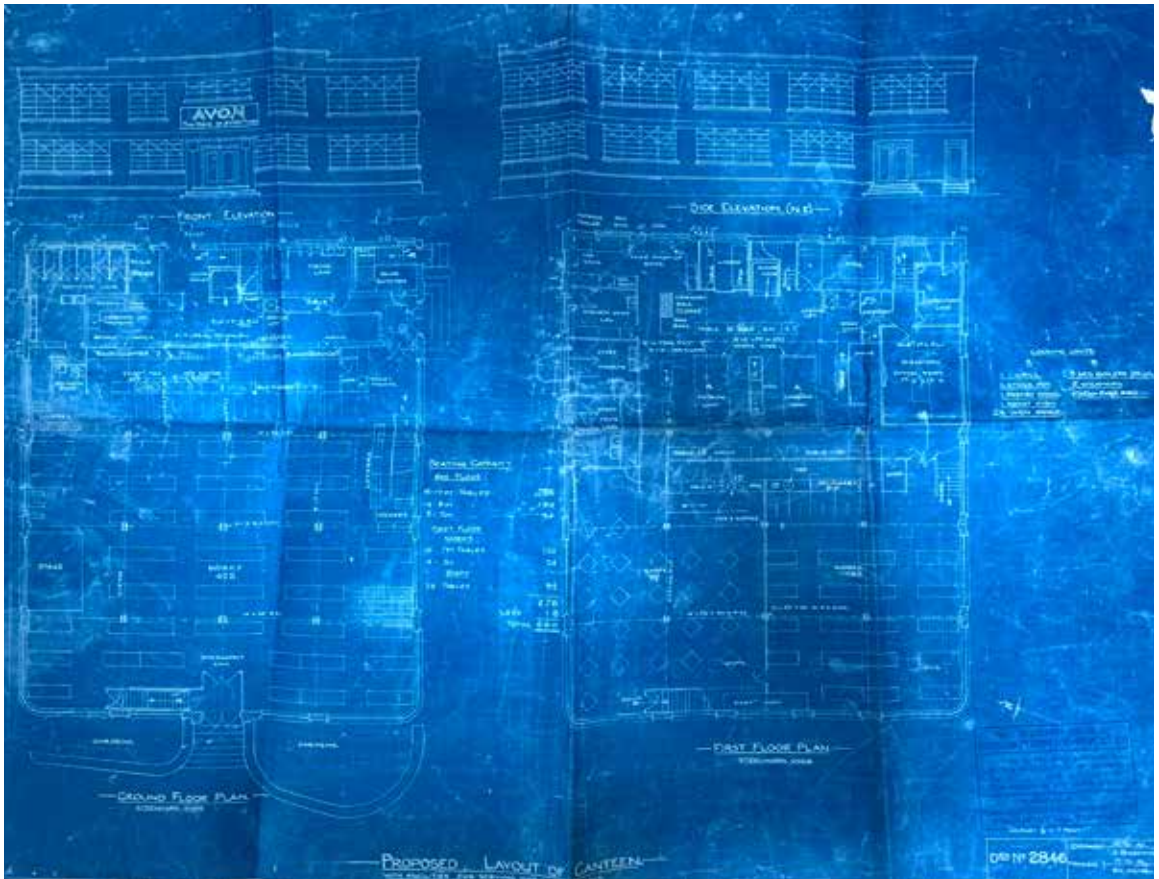
2.12 1933 aerial view showing new buildings on the west side of the site (Historic England EPW 041321)



2.13 Detail from the fourth edition 25 inch OS map, published in 1947. (National Library of Scotland)



2.14 The opening of the Avon staff canteen (in its original single-storey form) in 1940. (Andy York)



2.15 Blueprint plan for the works canteen, with additional second storey, 1941. (WSHC)



2.15a Blueprint insurance plan of the site, including the planned canteen building. (WSHC)

2.2.5 Post-war expansion

Post-war developments considerably extended and rebuilt the western range of buildings, creating the large north-light block that today includes **Buildings 164-172**. Aerial photographs taken in 1951 show the buildings 165, 167 and 169 under construction [**Plate 2.16**], and a photograph taken in September 1953 shows these new buildings complete, including the replacement (or re-roofing) of the large single-storey flat-roofed building referred to above [**Plate 2.23**].

The building works of the early 1950s also affected Avon House [**Plate 2.17-2.22**]. Ground and first-floor plans in the archive at the Wiltshire and Swindon History Centre show proposed alterations: principally a new two-storey flat-roofed extension on the west side of the building replacing (on the ground floor) a stone canted bay window that had been a feature of the ground floor, lighting the 'old board room'. The plans do not show the removal of part of the roof of the 17th-century building, though this was carried out as part of the same operation. A few years before, the east elevation of the 17th-century range had been refaced in buff brick. The current main staircase of the building (between ground and first floors) belongs to a later stage of development.



2.16 Aerial photograph of the site from the west, showing construction of new buildings, 1951. (Historic England EAW036625)



2.17 1950 aerial photograph of Avon House from the south east, before 1950s alterations. (Historic England EAW 033273)



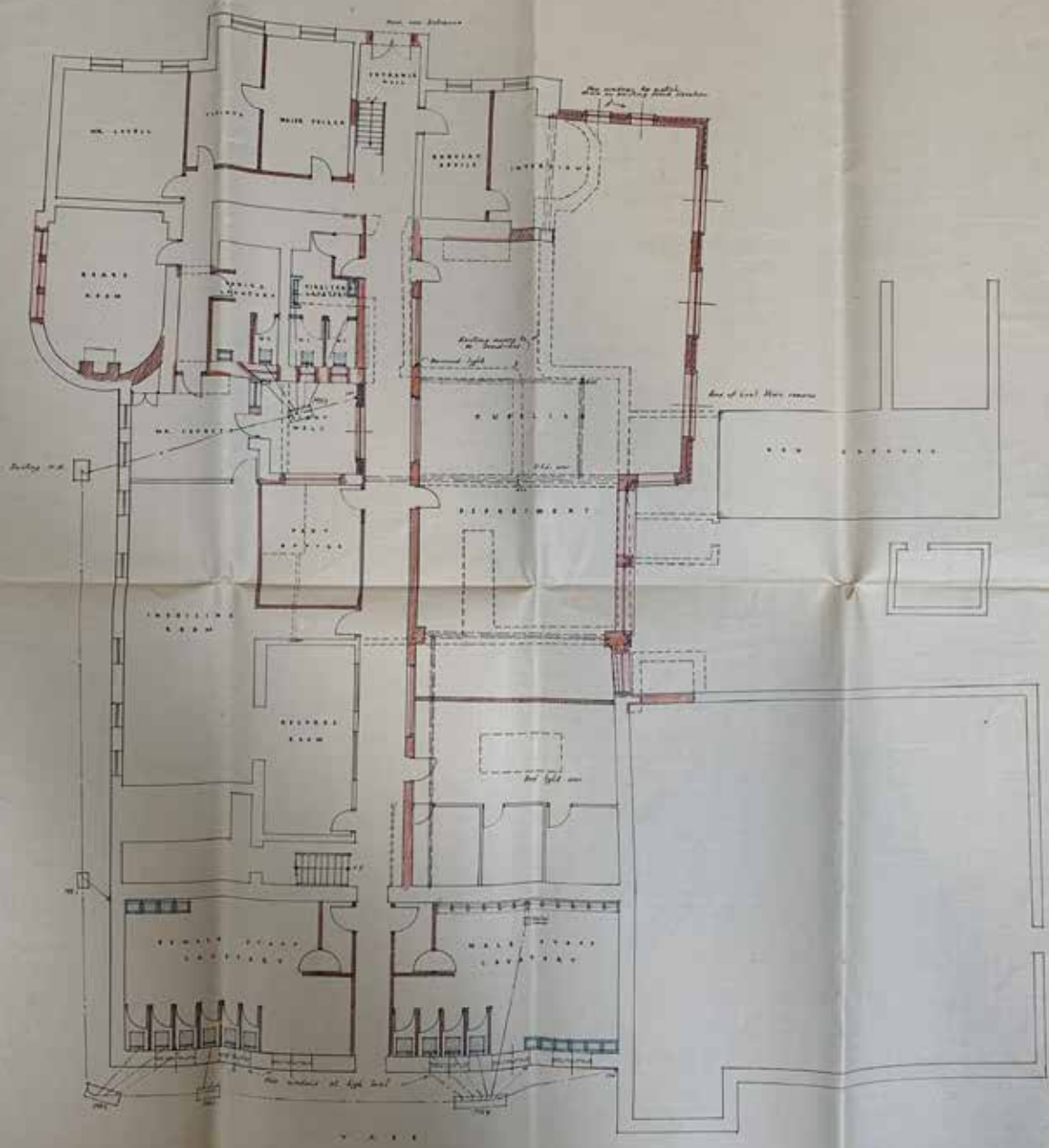
2.18 1950 aerial photograph of Avon House from the west, before 1950s alterations. (Historic England EAW 033279)



2.19 1950 aerial photograph of Avon House from the east, before 1950s alterations. (Historic England EAW 033282)

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(2)



PROPOSED ALTERATIONS
AND EXTENSIONS TO
OFFICES

REAR OFFICE PLAN

SCALE OF 1/4" = 1'-0"

REV	DATE	CUSTOMERS REVISION	REV	DATE	A.L.R. REVISION	BY
F			8			
E			5			
D			4			
C			3			
B			2			
A			1			

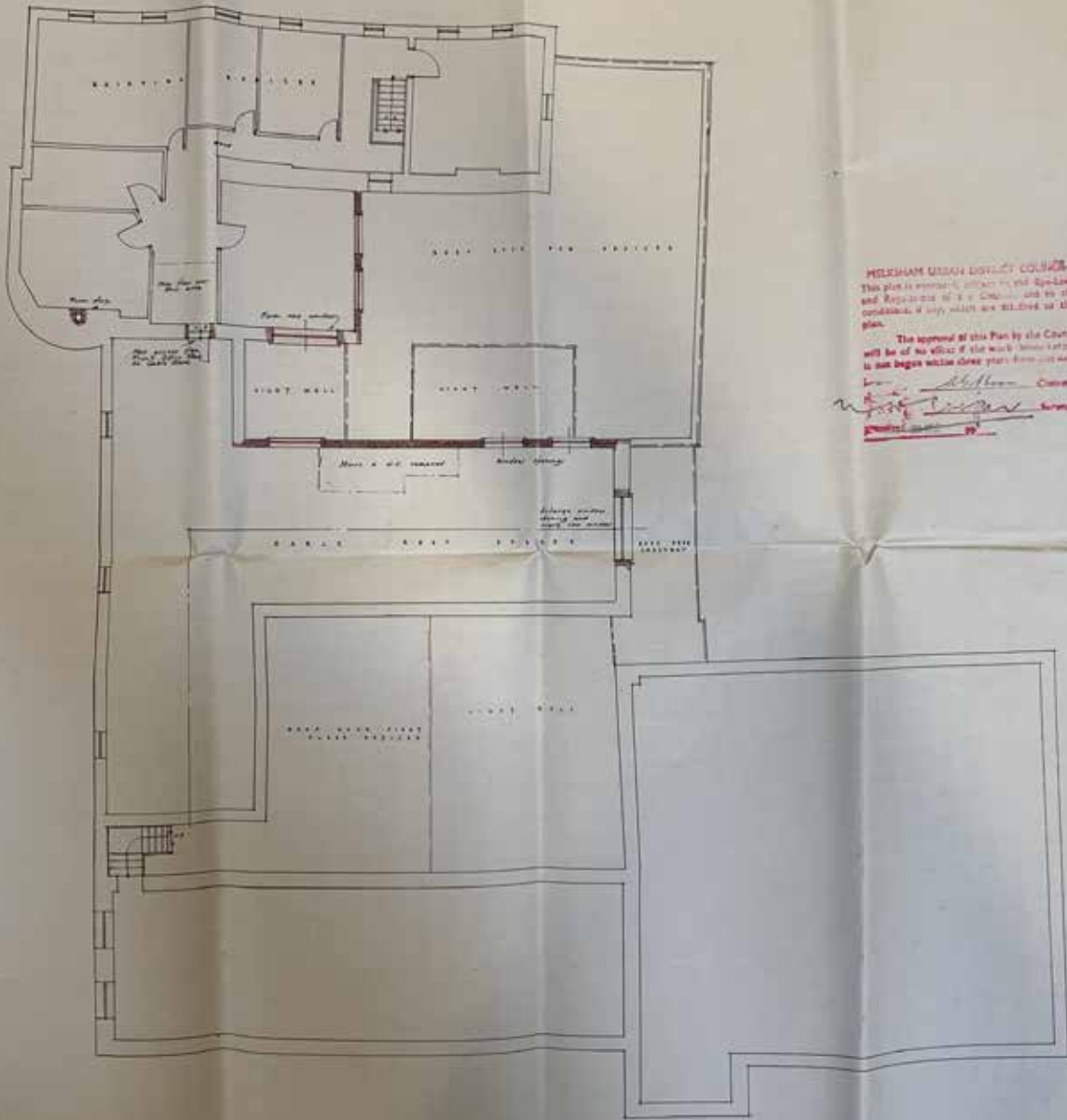
THE AVON INDIA RUBBER CO. LTD.
ENGINEERS

Doc No. 16

2.20 Ground floor plan, showing proposed alterations to Avon House, dated Jan 1952. (WSHC)

0452

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MELKSHAM GRAMMAR DISTRICT COUNCIL
 This plan is submitted in accordance with the Regulations of the Council and to the conditions of any contract entered into in the plan.
 The approval of this Plan by the Council will be of no effect if the work hereon is not begun within three years from the date of the approval.
 Approved: _____ Council
 Date: _____

PROPOSED ALTERATIONS
 AND EXTENSIONS TO
 OFFICES

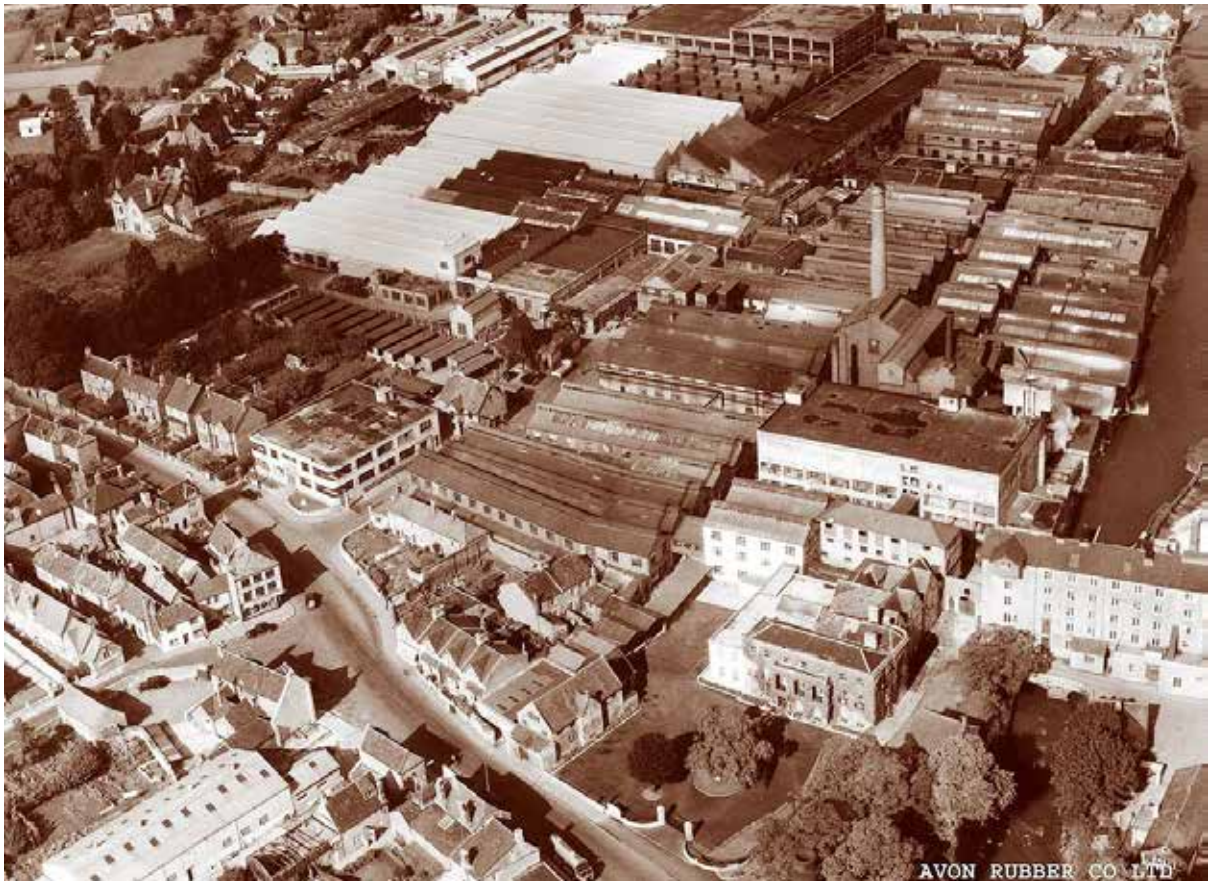
SECOND FLOOR PLAN

REV	DATE	CUSTOMERS REVISION	REV	DATE	A.I.R. REVISION
6					
5					
4					
3					
2					
1					
SHRINKAGE	D				
SCALE	C				
CHECKED	B				
TRACED	A				
DRAWN					
BY					
BY					

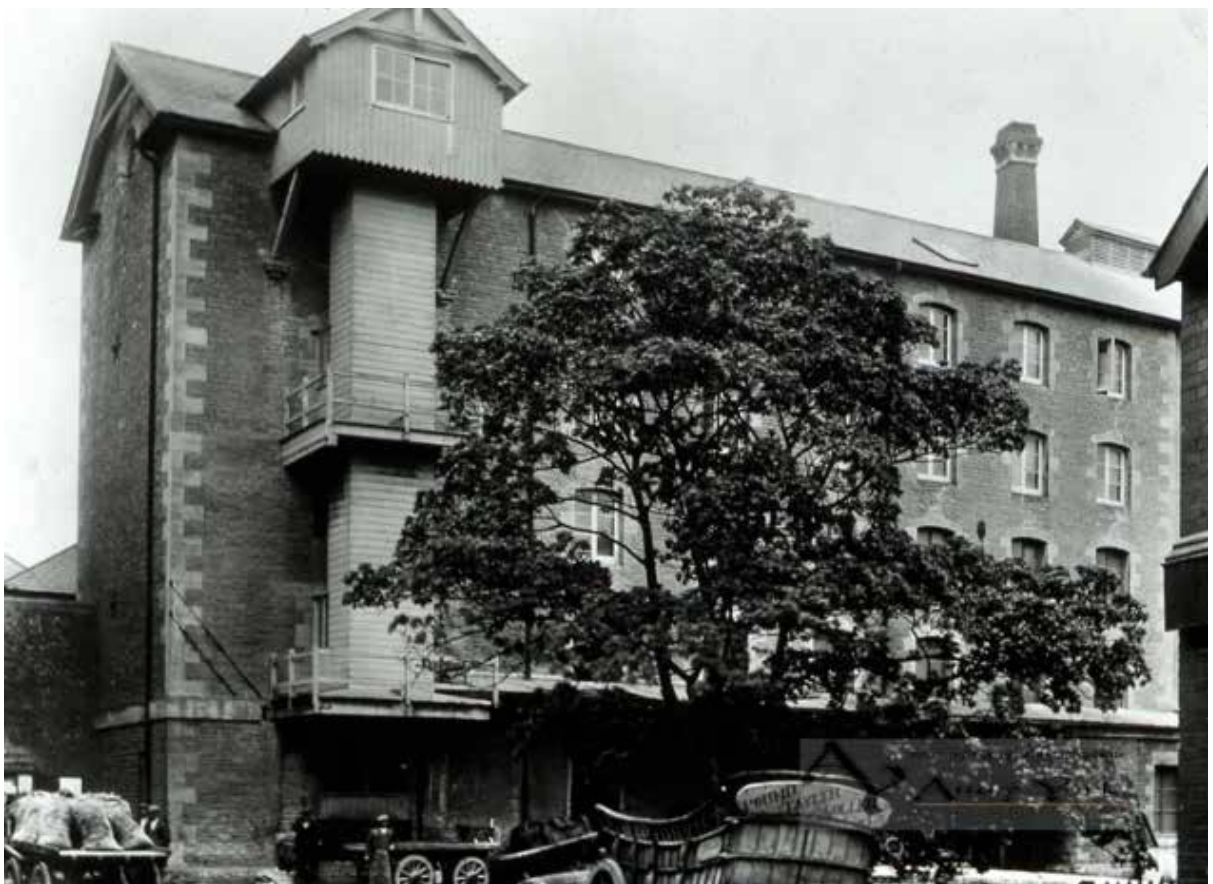
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Doc No. 10

2.21 1952 Second floor plan, showing proposed alterations to Avon House. (WSHC)



2.22 1953 aerial photograph showing the site from the south east, and Avon House after the completion of the extension. The recently built extension to the factory is clearly visible top left.



2.23 Tayler's Mill, circa 1925. (Andy York)

In 1954 Avon took over the recently closed corn mill immediately to the east of the factory. Built as a fulling mill, this building was converted to a corn mill by 1793, and in *Kelly's Directory* of 1855 was described as one of the largest corn mills in the county. In the early 20th century the mill was owned by John Tayler, and by the mid-1930s, the firm of Pound, Tayler & Collen [**Plates 2.23-2.25**]. The main building straddled the river, and extended on to 'The Island'. Here there had been a large late-18th- or early 19th-century mill house, demolished in favour of a large modern mill building, erected *circa* 1940.

The original mill building of five storeys plus attic was heavily modified for use by Avon in 1961 [**Plate 2.26**]. The original pitched roof and the top two storeys were removed from the main block, and the roof and top storey removed from the smaller attached block on its east side. These modifications were planned to make the building suitable for use as a 'service bay, sub depot and record room'. In 1964 a covered walkway at second-floor level was built behind the entrance arch, joining the corn mill building (**Building 95**) to the surviving part of the original cloth mill.

Building 156, with its wave-form cantilevered concrete porch canopy, was built shortly before 1966, the year in which the 17th century Mission Room, and several other buildings that faced the Bath Road, to the SW of Avon House, were demolished to create the large visitor's car park at the front of the factory. Around this time, too, 'The Chestnuts', a large late Victorian house at the junction of the Bath Road and Beanacre Road that has already lost part of its garden to the factory was demolished. A number of houses on the Bath Road to the west of the canteen were demolished too, in favour of the large flat-roofed buildings that now line this *cul-de-sac* part of the road.

In 1966 a major fire destroyed the finished goods stores at the top of the site. It was never rebuilt, as plans had already been made to extend the factory site to the east, and it was decided to use the site of the building as part of a long-term plan for a perimeter road around the factory.

In 1967 the River Avon, which had flooded the factory and the town on numerous occasions, was re-routed to run through the former meadows to the east. This development brought a significant amount of new land within the boundary of the factory, and buildings were soon constructed there. A new factory fire station (**Building 96**) was built on the front of the old corn mill, where the river had run, in 1969, and in about 1970 a new laboratory and office building (Building 87) was built beside the new river channel on the far-eastern side of the site using pre-cast concrete modules [**Plate 2.27**]. Elsewhere, houses on the south side of Scotland Road, at its east end, were demolished, and in 1985 three pre-fabricated 'energy capsules' comprising boilers with large coal hoppers above (**Buildings 101, 102, and 103**), were installed in what had been the back garden of those houses [**Plate 2.28**].

NB Photos in this section credited to Andy York are not yet rights cleared.



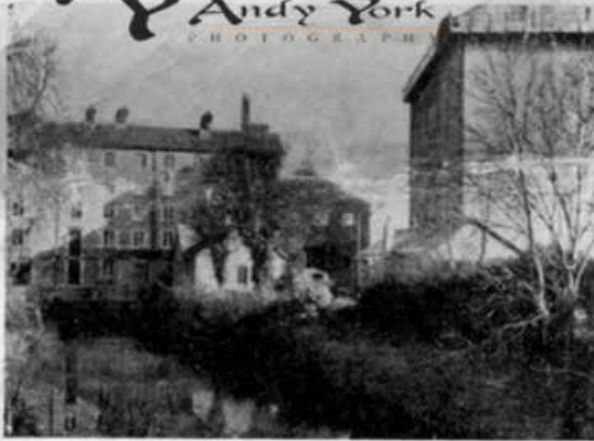
2.24 19th-century view of *The Island*, with the corn mill to the left. (Andy York)



2.25 Pound, Tayler & Collen's mill, with the new building to the right. (Andy York)

NEW HAT FOR THE MILL

www.andyyorkphotography.co.uk
Andy York
PHOTOGRAPHY



The Mill as it was in 1954.

A spectacular operation, when a crane with a 100 foot jib dropped a complete new storey on top of one of the office blocks was recently completed in Melksham, using the unit building system, which was described in our last issue.

The rapid growth of the Company in recent years, has brought an urgent need for more office accommodation and the latest operation has added another storey to the office block which is housed in the old Flour Mill, taken over by Avon ten years ago.

The units were delivered by lorries in folded packs and hoisted by the crane to the roof of the building. Once the services have been connected they will provide light, airy accommodation for part of the I.R.P. Sales Division.

At the same time a new bridge is being constructed over the gateway between the old mill and the main office block to provide an easy access to and from the offices in the mill.

Our photographs show the developments, stage by stage, in the life of the mill since it was taken over in 1954.

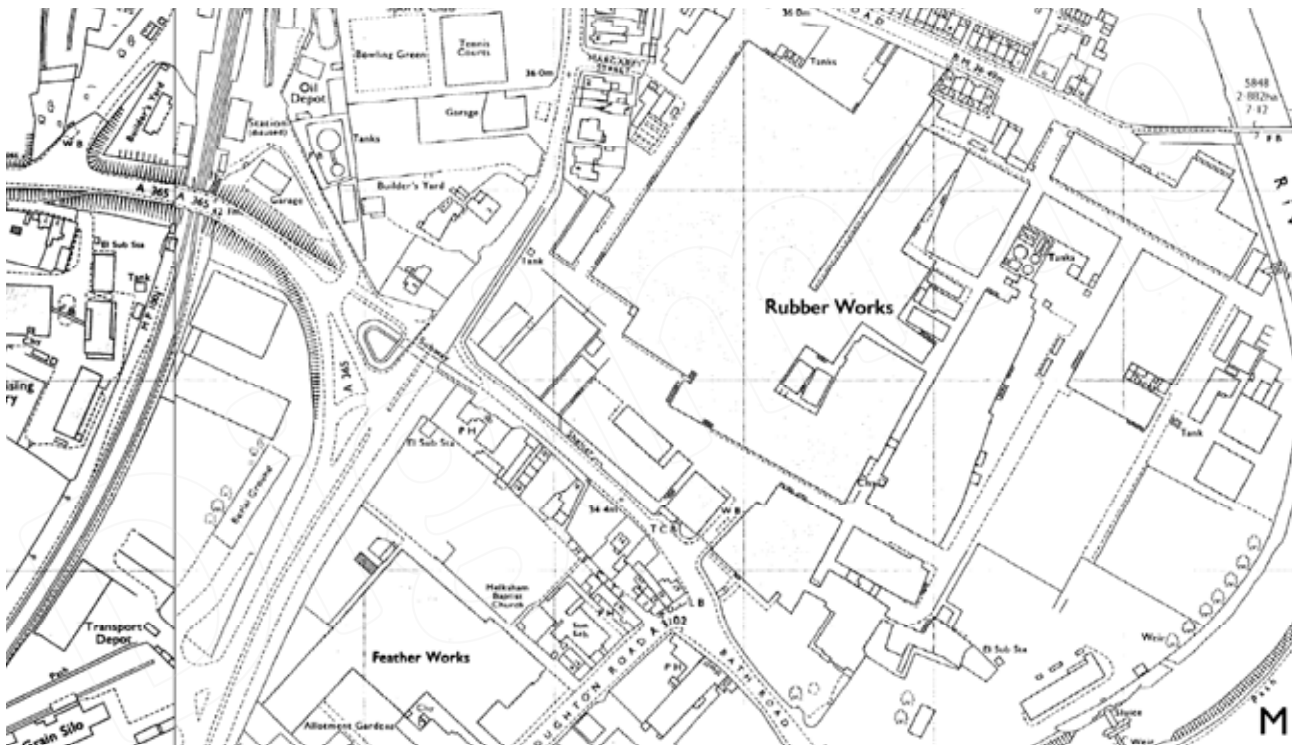


1961. The top three storeys come off.



. and in 1964 another storey goes on.

2.26 Newspaper article showing the partial demolition of the mill building. (Andy York)



2.27 1975 OS map of the site.



2.28 1980s aerial photograph of the site. (Cooper Tires)

2.3 Sources and Bibliography

Wiltshire and Swindon History Centre
The National Archives (tithe apportionment map, via www.thegenealogist.co.uk)
Andy York Photography, Melksham
Britain from Above (aerial photographs)
National Library of Scotland (historic maps)
Census Records (www.ancestry.com)
University of Leicester Special Collection (historic directories)

Published Sources

Victoria County History of the County of Wiltshire
Historic Town Trail of Melksham
Melksham: Official Town Guide, 1980/82
Melksham Spa: Guide and Directory, 1963

3.0 Site Survey Descriptions

3.1 Overview of the Site

The site is a mixture of traditional historic buildings, both residential and industrial, which have been re-purposed and incorporated into the rubber manufacturing site, and buildings which were purpose-built by Avon Rubber/ Coopers Tires. The site originally contained two separate mills – a cloth mill on the western side of the Avon and a corn mill on the eastern side (before the Avon was re-aligned), and there are some small remnants of both these 19th century mill complexes remaining. All of the buildings which pre-date the use of the site by Avon Rubber have undergone considerable alteration as part of their re-purposing, often with the result that their original form, appearance and function has been obscured or obliterated.

The site survey involved an external visual inspection of the whole site. Those buildings which appeared externally to have some historic or architectural interest were, where possible, visited internally as well. The site contains 173 separate buildings and structures and therefore not all of them have been described below. Only those buildings which seemed on first appraisal to have a degree of historic or architectural interest are described, with the remainder being modern (mid-late 20th century) industrial sheds, lockup units and warehouses of no potential heritage interest.

3.2 The Buildings

Note on the text: the building numbers correspond to the plan provided which is reproduced here as **Plan 1**.

3.2.1 Buildings 1 and 2: Avon House and range to rear [Plates 3.1-3.5]

Avon House was constructed in the first quarter of the 19th century and is a handsome Classical Regency design in stone. It is listed Grade II and of high significance although it has been altered both internally and externally to its detriment.

Attached to the rear is a two storey brick-faced range which, on internal inspection, has proved to be a 17th century timber-framed building although now much altered. The brick façade and roof coverings are modern and it is unclear how much of the timber frame survives although the roof members do and are visible internally.

Cast iron spear-headed railings which are caulked into a stone plinth and located to the north and east of Avon House are contemporary with the building of Avon House; they are also physically attached to Avon House on the eastern side. They are therefore fall under the protection conferred by listing.

The setting of the building has radically changed since its construction and throughout the 20th century. The immediate setting of the building to the south is a large car-park whereas historically the OS mapping sequence shows both buildings (now demolished) and also a garden/ carriage turning. The setting to the rear (north) has undergone much less change due to the existence of the historic buildings abutting the rear of Avon House. There is considerable scope to improve the setting of the building to the south, and more clearly integrate the historic railings and boundary with the house itself.



Plan 1 Plan of the site



3.1 Avon House



3.2 Avon House and mid-20th century extension to west



3.3 Avon House and 17th century gabled range to rear



3.4 Avon House and 17th century gabled range to rear



3.5 Railings and Gate Piers to Avon House

3.2.2 Stone arch between buildings 2 and 96 (not accurately shown on Plan 1) (refer Plate 3.5)

Attached to the below mentioned Cloth Mill and Corn Mill is a two-storey arched entrance which appears on the 1880 OS map and was therefore constructed between 1837 (it is not shown on the Tithe Map) and 1880. The structure is not attached to the listed structures and therefore appears not to be listed, but is likely to be considered a non-designated heritage asset. The lower part is original and of significance; the upper part appears to have been added in the mid-20th century.

3.2.3 Part of Building 2 (not marked separately on the plan): part of the pre-1837 Cloth Mill Complex [Plate 3.6]

This building is three storeys and constructed of roughly-squared and coursed stone, with stone window frames. The original windows have been replaced with UPVC. It appears on the 1837 Tithe Map and therefore pre-dates this, although the exact date of construction is unknown stylistically it appears to be a building of the 1820s-30s. It was not originally directly joined to the 17th century range at the rear of Avon House which it now abuts, as there was originally a gap between the two which has been filled in more recently, probably in the 1950s. It does not, therefore, appear to be physically attached to the listed building in a way which would make it part of the listed building, and there is no evidence that there was any functional relationship between the two buildings prior to listing. Our research has not been able to provide conclusive evidence of what the building was used for (apart from being part of the cloth mill complex), and therefore it is not possible to say with any certainty whether the building is in the curtilage of the listed Avon House and therefore also protected by the listing. It may be that a legal opinion is required on this point. If it is not considered to be a curtilage listed structure, it would certainly be considered a non-designated heritage asset, and one of the more significant ones on the site. In our view it is unlikely to meet the high criteria for inclusion on the statutory list because of the degree of alteration which it has undergone.

3.2.4 Buildings 18 and 19 (facades only): Control Lab [Plate 3.7]

These buildings pre-date 1922 and have stone facades, although the roof, southern and eastern elevations are all modern. The only historic part which appears to remain is the western and northern elevations. Due to the extensive alterations and re-building these buildings are unlikely to be considered non-designated heritage assets.



3.6 Sole remaining building from Victorian Cloth Mill complex



3.7 Buildings 16 and 17

3.2.5 Building No. 20: Canteen [Plates 3.8-3.10]

An Art Deco building designed in 1938 and built in 1940. Originally single storey, it had a second storey added during World War II, presumably because the factory's work contributed to the war effort and so was exempt from restrictions on building. A handsome and architecturally accomplished building but apparently designed in-house as the drawings do not carry an architect's name. Broadly square plan, with large windows to the front and sides (replaced). Whilst it is late to be considered part of the Art Deco movement proper, and not apparently by an architect associated with Art Deco buildings more widely, it is of presence in the street scene and of character. Art Deco buildings are relatively unusual nationally, and certainly so in rural Wiltshire, and in our view this building is likely to be considered a non-designated heritage asset. As a further consideration and in light of the quality of the building we have considered whether it might be a candidate for inclusion on the national list. However, the interior has been considerably altered, an entire floor added and the windows replaced; these facts coupled with the fact that it is not by a known architect means that in our view it is likely to meet the high criteria for listing.



3.8 Canteen



3.9 Canteen



3.10 Canteen

3.2.6 Building 7: 1920s building [Plates 3.11-3.12]

This is a striking three storey building, rectangular in plan, constructed in concrete with a flat roof concealed behind a tall parapet and the intimation of a projecting corner tower. This is relatively early for a building of this design, although it has not been possible to establish much about its history. The architect – if there was one, rather than it being designed in-house – is not known. Some of the original windows appear to remain in situ on the third floor, although the remainder have been replaced with UPVC. On the basis that this is a relatively early and striking building, we consider that it is likely to be considered a non-designated heritage asset.

3.2.7 Building 87: 1970s Former Lab and Tele-Sales [Plates 3.13-3.14]

This is a large building in the southern part of the site, separate from any others and adjacent to the river Avon. It was constructed in 1970 as purpose-built laboratory on the ground floor with offices for tele-sales above. Three storeys and 30 bays, it forms a rectangle roughly aligned north-east to south-west. We have not been able to identify whether it was designed by an architect or in-house. A concrete building where the window frames are heavily moulded, but the elevation is almost entirely unrelieved and monotonous; it has some architectural presence but on balance, and due to the high rate of survival of this building type from this period, we have concluded that it is unlikely to be considered a non-designated heritage asset.



3.11 1920s Office Building



3.12 1920s Office Building



3.14 Laboratory and tele-sales



3.13 Laboratory and tele-sales

3.2.8 Buildings 94 and 95: Corn Mill/ former Racing Sales and Tech Area [Plates 3.15-3.16]

These buildings were originally part of the corn mill and were constructed in 1793. There is evidence in the north wall of the former route of the River Avon which flowed beneath the building and which is visible as an arch now filled in. In the same wall there are also a number of original window openings (the windows themselves have been replaced with UPVC). The buildings are of roughly coursed lime stone. As evidence of the former Victorian corn mill buildings, the buildings have some interest and are likely to be considered non-designated heritage assets.



3.15 Former Corn Mill (LHS)



3.16 Former Corn Mill

3.2.9 Building 96: Former Fire Station [Plate 3.17]

Constructed in 1969 this building is physically attached to the former Victorian mill described above but is a concrete building and of no historic or architectural interest. It is unlikely to be considered a non-designated heritage asset.



3.17 Former Fire Station

3.2.10 Buildings 101-103: Boiler Capsules [Plate 3.18]

These are three structures to the north of the site which were constructed in 1984 to provide additional boiler capacity they consist of shed structures below with water tanks and chimneys above. Due to their modernity and lack of architectural or historic interest they have been discounted as being of any heritage merit and are unlikely to be considered non-designated heritage assets.

3.2.11 Building 131: 13 Beanacre Road [Plates 3.19-3.19a]

This is an Edwardian semi-detached former residential house which is now used partially as WCs and showers. Not originally part of the site, it now has fencing around it which is unattractive and is in poor condition. However, it is of a matching design to 15, 17 and 19 Beanacre Road all of which are still in residential use and as it is one half of a pair of symmetrical semi-detached houses in a matching row it has more townscape presence than it would do as an individual building. It is likely to be considered a 'non designated heritage asset'.



3.18 Boiler Capsules



3.19 Rear of 13 Beanacre Road



3.19a Front door detail 13 Beanacre Road

3.2.12 Buildings 160-169: Main Production Hall [Plates 3.20-3.25]

This is the heart of the Avon rubber company factory and consists of a series of brick sheds with saw-tooth north light roofs. Largely constructed between 1950 and 1953, but added to successively, the buildings comprise the largest internal space on the site and as a result are physically if not architecturally impressive. A series of brick external walls and (what appears to be) asbestos roofing, the main production hall buildings are very typical of both their time and purpose. Many factory processes in the middle part of the 20th century took place in buildings very similar to these, and as a result there are large numbers of such buildings which are, in general (and like this one) not designed by a named architect. The buildings have been adapted over the years by the insertion of new up-and-over doors. In our view this range is not of any architectural or historic interest and is unlikely to be considered a 'non designated heritage asset'.

3.2.13 Baker Street Car Park Site [Plate 3.26]

Under the same ownership is the Baker Street Car Park site, which is opposite the Canteen and where there is a lapsed planning permission for residential development. There are no visible heritage constraints on this site which might prevent renewal of this permission.



3.20 Main Production Hall



3.21 Main Production Hall



3.22 Main Production Hall



3.23 Main Production Hall



3.24 Main Production Hall



3.25 Main Production Hall



3.26 Baker Street Car Park site

4.0 Assessment of Significance

4.1 Introduction

The purpose of this section is to provide an assessment of significance of the Cooper Tire and Rubber Company site in Melksham so that the site can be assessed in terms of its potential heritage value. The assessment begins with a general summary of the site's history and significance; then those elements of the site which are either known heritage assets, or which are highlighted by this report for their potential to be considered by others to be non-designated heritage assets are described and assessed.

This assessment responds to the requirement of the National Planning Policy Framework to 'recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance'. The NPPF defines significance as;

'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological (potential to yield evidence about the past), architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting'.

4.2 The Site

4.2.1 Listed Buildings

Avon House is listed Grade II and is of special architectural and historic interest. Included in the list description is the two-storey brick building to the rear (building 2 on the plan) which is a 17th century structure which has been re-facaded in more recent times but which contains historic fabric internally. The 1950s extension to the west of Avon House (marked as being part of building 1, but also, on the ground, also part of buildings 5 and 6), is of no architectural or historic interest and obscures the plan form and elevation of the main listed building. The arch (not shown on the plan but spanning between buildings 2 and 95) is likely to be considered as being attached to the listed building, although it has been altered.

Avon House itself has been very altered by alterations internally (including the removal of the original staircase) and in particular by the loss of the original windows and their replacement with UPVC ones. However, a number of rooms towards the front (south) of the building retain their original form and some original decorative joinery etc.

This special interest is manifest in the fabric and plan form of the building, which has the following hierarchy of significance. Please note that this list is not exhaustive.

Of the highest and particularly sensitive to change are:

- The south and east elevations (although the windows in all elevations are modern UPVC and detract from the significance of the building);
- The southern rooms on the ground first and second floors;

- The form of the roof;
- The decorative railings to the south and east;
- The structure of the 17th century range to north including the roof structure, floor structure (this is not visible throughout but where it is visible above modern suspended ceilings is 17th century in construction), and any remaining timber framing within the walls;
- The lower section of the arch between buildings 2 and 95.

Factors which detract from the building's significance and offer an opportunity for enhancement are:

- The modern UPVC windows throughout;
- The modern single storey extension to the west;
- The rear (northern) rooms and modern staircase, and all of the modern overlay fittings such as suspended ceilings;
- The modern brickwork and roof covering of the 17th century range to the rear;
- The upper (added) section of the arch between buildings 2 and 95.

4.2.2 Non-Designated Heritage Assets

The following buildings are likely to be considered non-designated heritage assets.

- Building 20 – the former canteen. This Art Deco style building has townscape presence and is well-designed incorporating some of the major themes of the Art Deco movement – sleek lines, curved windows and stepped motifs. It appears to have been designed in-house by the Avon Rubber Company. The plans for it are dated 1938 and it was built in 1940, meaning that it would not have been an early or pioneering example, but rather coming right at the end of the fashion for Art Deco buildings. It has been altered by the addition of another storey and its original windows replaced.
- Buildings 94 and 95 – part of the Victorian corn mill complex. These buildings display some of the important characteristics of the Victorian corn mill, including evidence of the infilled mill wheel in the northern elevation and a reminder of the former course of the River Avon, which used to run beneath this building before it was re-aligned. As an example of a Victorian mill it has both local historic and social interest.
- Rear (northern section) of building 2 (not separately marked on the plan) – this is the only remaining part of the Victorian cloth mill complex and is shown on the Tithe Map of 1837 (and therefore predates this map). A three-storey roughly-dressed stone building with stone window frames (original windows replaced with modern UPVC). On the basis of our research into the site it has not been possible to come to a conclusive view over whether or not this building might be in the curtilage of Avon House and the listed 17th century structure to the rear (north) of Avon House. It appears that it may not be; however, even if it is not in the curtilage of the listed building, it remains of relatively high social and historic importance, as an early cloth mill and the only remains of the formerly extensive cloth mill on the site.
- Building 7 – a 1920s concrete framed building. This building is relatively early in terms of both form and appearance and the elevated corner 'tower' gives the building considerable presence

Avon House and environs: component buildings



KEY

- Avon House: 19th Century (Grade II listed and of significance)
- Avon House: 17th Century (Grade II listed and of significance)
- Avon House: 1950s and other additions (Grade II listed but not of significance)
- 19th Century cloth mill (unlisted but may be considered an NDHA)
- Corn mill and gateway (unlisted but may be considered an NDHA)
- Early 20th Century fireproof building (unlisted but may be considered an NDHA)

4.1 Avon House Components

in the wider site. It retains some original windows although many have been replaced in UPVC and there are modern storage units to the east (buildings 8 and 9) which are of no interest.

- Building 131 – 13 Beanacre Road, an Edwardian semi-detached house which is now a WC and shower-block and has been very altered inside. This forms one half of a semi-detached pair of residential houses constructed in 1901 which are entirely typical of their type and date. Constructed in brick which has been clad in stone, with stone dressings and prominent, handed but symmetrical gables, the building is of a type commonly found in conservation areas. It is included on this list because of the group it forms with both its semi-detached neighbour and other similar houses to the north-west on Beanacre Road.

Please refer to Plate 4.1 for a schematic illustration showing the extent and location of the buildings around Avon House.

5.0 Summary and Conclusions

5.1 Listed Buildings – Extent of Protection and Capacity for Change

Avon House and the 17th-century range to the rear (north), and the mid-20th century extension to the west (which becomes part of buildings 5 and 6) are included in the list description. However, in our assessment while the former is and should be protected the latter should not because it is not of special interest and detracts from the plan form, legibility, appearance and significance of the listed building. Its removal ought to be seen as beneficial to the listed building, helping to reveal its significance and improve its appearance. The arch between buildings 2 and 95 is attached to the listed 17th-century element and appears to meet the criteria for being considered part of the listed building. The original railings to Avon House are also physically attached to the listed building and therefore are all also either listed by virtue of attachment or by being in the curtilage of the listed building.

In our view the Victorian building which was part of the cloth mill, located to the north of the above (not separately marked on the plan but part of building 2) is probably not part of the listed structure but instead is likely to be considered a non-designated heritage asset.

The extent of protection (ie buildings where alterations or demolition would require listed building consent) is therefore:

- Avon House inside and outside;
- 17th century wing to rear (north) inside and outside;
- Mid-20th century extension to left hand side (west) inside and outside in theory, but in practice there is nothing of significance;
- Arch between buildings 2 and 95 inside and outside; and
- Railings and stone plinth into which they are caulked.

There are a number of routes to providing additional clarity on the extent (and perhaps also the significance) of the listed buildings. These are

1. Obtain the advice of a planning barrister with experience of heritage matters;
2. Through discussions with the conservation officer at Wiltshire Council; or
3. By requesting a clarification on the list description from Historic England.

1 and 3 certainly carry a cost as both a planning barrister and Historic England will charge for these services. It may be possible to engage in informal discussion with the conservation officer without having to pay for the advice, but this would have to be ascertained with the Council.

The scope for changing these protected structures, assuming that listed building consent is sought and granted first, is in our view quite wide and not all of the above contribute to the special interest of the buildings. More detailed assessment would be required to make a listed building

consent application, but in general terms we find that the mid-20th century extension to the west is harmful to the appearance and special interest of the listed building; that the upper part of the arch has been added later is also not of significance; that the brick façade of the 17th century wing obscures the significance of the building; and that the UPVC windows and extensive internal re-modelling of Avon House both obscure its appearance and significance and offer scope for improvements and change which would better reveal the significance of the site. Such a package of improvements could be used to weigh in the mix of an overall larger planning application.

5.2 Non-Designated Heritage Assets

We have identified five buildings which are likely to be considered non-designated heritage assets and these are set out in 4.2.2 above, with the caveat that one of them (part of the former Victorian cloth mill) may yet be found to be part of the listed building.

Policy provisions with respect to listed buildings are relatively clear; policy provisions with reference to non-designated heritage assets are much less so. There is, for example, no clear criteria to establish what may be considered a non-designated heritage asset and we have therefore used our judgement, informed by our research into the history of the site, to make these conclusions. In considering these buildings, we do not think that any of them meet the criteria for being added to the statutory list, with the exception of remains of the former cloth mill (part of building 2, not separately marked on the plan) which we have assessed as being a non-designated heritage asset, but which might be viewed as being in the curtilage of the listed Avon House. In general terms there is likely to be considerable scope for changing these structures. In terms of non-designated heritage assets, unlike listed buildings, permission is not required to alter them internally and it is essentially their contribution to amenity and townscape which is important. Conversion to new uses which keep their overall external form is likely to be welcomed by the local authority.

The NPPF states at paragraph197:

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

In reality, if a scheme across the whole site which delivered the requirements of other planning policy provisions were to come forward it is not inconceivable that, on balance, any or all of these non-designated heritage assets could be demolished. Having said that, all are characterful and interesting historic buildings which could contribute significantly to the value of any new development.

5.3 Conclusion

This report has set out to undertake an exercise in due diligence in terms of assessing, analysing, researching and identifying the buildings on the site of the former Cooper Tire and Rubber Company site in Melksham. The report has set out the history and development of the site, charting the

way in which a number of different uses including two different Victorian-era mills (a cloth mill and a corn mill), and a large residential house, were gradually taken over and agglomerated by the Avon Rubber Company during the course of the 20th century. Survey work has been undertaken to assess all of the buildings on the site, with those which seemed initially to have potential architectural or historic interest undergoing more intensive analysis. This has led to an explanation of the extent of the listed buildings, including those which are listed by virtue of being attached, and those which are listed by virtue of being in the curtilage. It has also identified a number of key historic buildings on the site which are not listed but which are likely to be considered non-designated heritage assets in the planning process. The report has also identified a potentially anomalous building – part of the former cloth mill – where it has not been possible to come to a definitive conclusion over whether it is part of the listed building or not and where further, legal advice may be required in the future. Finally this report has set out extent of significance of the listed buildings and their capacity for change, and has considered the policy implications for the non-designated heritage assets.

We would request that this report and its appendices be taken into account in the next phase of planning for the future of the site.

Appendix I - Statutory List Description

ST 9064 MELKSHAM BATH ROAD (east side)

5/12 Avon House
GV II

Large house, now offices of Avon Rubber Company. Early C19. Ashlar, Welsh slate 2-span hipped roof. Regency. 3-storey symmetrical front; 2:3:2 windows. Round-arched door is left in central 3-window projection of one storey with verandah over; two 12-pane sashes to right are in recessed round-arched openings with fanlights. Either side of centre are two 12-pane sashes. First floor has central tall stone verandah with wrought iron balconies to 3 segmental-arched openings with key pattern over and separated by grooved pilasters; plat band and 3 French windows are behind verandah, two 12-pane sashes to either side with wrought-iron balconies. Second floor has seven small 6-pane sashes, central 3 are separated by grooved pilasters and are behind balustraded parapet to top of verandah. Cornice and blocking course. Right return has 12-pane sash to left and pair of sashes to right on ground and first floors, second floor has 6-pane sashes to left and one lunette to right. To left is 2-storey, 2-window wing with sashes and plat band. To rear right is 2-storey brick wing with six sashes and three attic gables. Interior not inspected.

Listing NGR: ST9035264258

Appendix II - Planning Policy and Guidance

Planning (Listed Buildings and Conservation Areas) Act 1990

The Act is legislative basis for decision making on applications that relate to the historic environment.

Sections 16 and 66 of the Act impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

in considering whether to grant 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 features of special architectural or historic interest which it possesses.

National Planning Policy Framework

Any proposals for consent relating to heritage assets are subject to the policies of the NPPF (February 2019). This sets out the Government's planning policies for England and how these are expected to be applied. With regard to 'Conserving and enhancing the historic environment', the framework requires proposals relating to heritage assets to be justified and an explanation of their effect on the heritage asset's significance provided.

Paragraph 7 of the Framework states that the purpose of the planning system is to 'contribute to the achievement of sustainable development' and that, at a very high level, 'the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

At paragraph 8, the document expands on this as follows:

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives:

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future

generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

and notes at paragraph 10:

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

With regard to the significance of a heritage asset, the framework contains the following policies:

190. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

In determining applications local planning authorities are required to take account of significance, viability, sustainability and local character and distinctiveness. Paragraph 192 of the NPPF identifies the following criteria in relation to this:

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

With regard to potential 'harm' to the significance designated heritage asset, in paragraph 193 the framework states the following:

...great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether the any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

The Framework goes on to state at paragraph 194 that:

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.

Where a proposed development will lead to 'substantial harm' to or total loss of significance of a designated heritage asset paragraph 195 of the NPPF states that:

...local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

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

With regard to 'less than substantial harm' to the significance of a designated heritage asset, of the NPPF states the following;

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

In terms of non-designated heritage assets, the NPPF states:

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

National Planning Practice Guidance

The National Planning Practice Guidance (NPPG) was published on the 23rd July 2019 to support the National Planning Policy Framework (NPPF) 2019 and the planning system. It includes particular guidance on matters relating to protecting the historic environment in the section: Conserving and Enhancing the Historic Environment.

The relevant guidance is as follows:

Paragraph 2: What is meant by the conservation and enhancement of the historic environment?

Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in every day use and as yet undiscovered, undesignated buried remains of archaeological interest.

In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such

heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time. In the case of archaeological sites, many have no active use, and so for those kinds of sites, periodic changes may not be necessary, though on-going management remains important.

Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-making in respect of applications for planning permission and listed building consent to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development. Heritage assets are either designated heritage assets or non-designated heritage assets.

Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past. So where the complete or partial loss of a heritage asset is justified (noting that the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted), the aim then is to:

- capture and record the evidence of the asset's significance which is to be lost
- interpret its contribution to the understanding of our past; and
- make that publicly available (National Planning Policy Framework paragraph 199)

Paragraph 6: What is "significance"?

'Significance' in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting.

The National Planning Policy Framework definition further states that in the planning context heritage interest may be archaeological, architectural, artistic or historic. This can be interpreted as follows:

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

In legislation and designation criteria, the terms 'special architectural or historic interest' of a listed building and the 'national importance' of a scheduled monument are used to describe all or part of what, in planning terms, is referred to as the identified heritage asset's significance.

Paragraph 7: Why is 'significance' important in decision-taking?

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

Paragraph 13: What is the setting of a heritage asset and how should it be taken into account?

The setting of a heritage asset is defined in the Glossary of the National Planning Policy Framework.

All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.

When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

Paragraph 15: What is the optimum viable use for a heritage asset and how is it taken into account in planning decisions?

The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation.

By their nature, some heritage assets have limited or even no economic end use. A scheduled monument in a rural area may preclude any use of the land other than as a pasture, whereas a listed building may potentially have a variety of alternative uses such as residential, commercial and leisure.

In a small number of cases a heritage asset may be capable of active use in theory but be so important and sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.

It is important that any use is viable, not just for the owner, but also for the future conservation of the asset: a series of failed ventures could result in a number of unnecessary harmful changes being made to the asset.

If there is only one viable use, that use is the optimum viable use. If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one. Nor need it be the original use. However, if from a conservation point of view there is no real difference between alternative economically viable uses, then the choice of use is a decision for the owner, subject of course to obtaining any necessary consents.

Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused, and provided the harm is minimised. The policy on addressing substantial and less than substantial harm is set out in paragraphs 193-196 of the National Planning Policy Framework.

Paragraph 18: How can the possibility of harm to a heritage asset be assessed?

What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting.

Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 194-196) apply.

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

Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural

or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings' significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting.

The National Planning Policy Framework 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 also makes clear that any harm to a designated heritage asset requires clear and convincing justification and sets out certain assets in respect of which harm should be exceptional/wholly exceptional (see National Planning Policy Framework, paragraph 194).

Paragraph 20: What is meant by the term public benefits?

The National Planning Policy Framework requires any harm to designated heritage assets to be weighed against the public benefits of the proposal.

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

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

Paragraph 39: What are non-designated heritage assets and how important are they?

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

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

Paragraph 40: How are non-designated heritage assets identified?

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

Plan-making bodies should make clear and up to date information on non-designated heritage assets accessible to the public to provide greater clarity and certainty for developers and decision-makers. This includes information on the criteria used to select non-designated heritage assets and information about the location of existing assets.

It is important that all non-designated heritage assets are clearly identified as such. In this context, it can be helpful if local planning authorities keep a local list of non-designated heritage assets, incorporating any such assets which are identified by neighbourhood planning bodies. (Advice on local lists can be found on Historic England's website.) They should also ensure that up to date information about non-designated heritage assets is included in the local historic environment record.

In some cases, local planning authorities may also identify non-designated heritage assets as part of the decision-making process on planning applications, for example, following archaeological investigations. It is helpful if plans note areas with potential for the discovery of non-designated heritage assets with archaeological interest. The historic environment record will be a useful indicator of archaeological potential in the area.

Historic England: Historic Environment Good Practice Advice in Planning (March 2015)

The purpose of the Good Practice Advice note is to provide information on good practice to assist in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (NPPG).

Note 2 'Managing Significance in Decision-Taking'

This note provides information on:

- assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.

It states that:

The advice in this document, in accordance with the NPPF, emphasises that the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or investigate the asset needs to be proportionate to the significance of the heritage assets affected and the impact on that significance.

In their general advice on decision-taking, this note advises that:

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. The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest.

Paragraph 6 highlights the NPPF and NPPG's promotion of early engagement and pre-application discussion, and the early consideration of significance of the heritage asset in order to ensure that any issues can be properly identified and addressed. Furthermore, the note advises that:

As part of this process, these discussions and subsequent applications usually benefit from a structured approach to the assembly and analysis of relevant information. The stages below indicate the order in which this process can be approached – it is good practice to check individual stages of this list but they may not be appropriate in all cases and the level of detail applied should be proportionate.

- 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.

The Assessment of Significance as part of the Application Process

Paragraph 7 emphasises the need to properly assess the nature, extent and importance of the significance of a heritage asset and the contribution of its setting early in the process, in order to form a successful development, and in order for the local planning authority to make decisions in line with legal objectives and the objectives of the development plan and the policy requirements of the NPPF.

8. Understanding the nature of the significance is important to understanding the need for and best means of conservation. For example, a modern building of high architectural interest will have quite different sensitivities from an archaeological site where the interest arises from the possibility of gaining new understanding of the past.

9. Understanding the extent of that significance is also important because this can, among other things, lead to a better understanding of how adaptable the asset may be and therefore improve viability and the prospects for long term conservation.
10. Understanding the level of significance is important as it provides the essential guide to how the policies should be applied. This is intrinsic to decision-taking where there is unavoidable conflict with other planning objectives.
11. To accord with the NPPF, an applicant will need to undertake an assessment of significance to inform the application process to an extent necessary to understand the potential impact (positive or negative) of the proposal and to a level of thoroughness proportionate to the relative importance of the asset whose fabric or setting is affected.

Curtilage Structures

15. Some buildings and structures are deemed designated as listed buildings by being fixed to the principal building or by being ancillary within its curtilage and pre-dating 1 July 1948. Whether alteration, extension or demolition of such buildings amounts to harm or substantial harm to the designated heritage asset (i.e. the listed building together with its curtilage and attached buildings) needs careful consideration. Some curtilage structures are of high significance, which should be taken fully into account in decisions, but some are of little or none. Thus, like other forms of heritage asset, curtilage structures should be considered in proportion to their significance. Listed buildings designated very recently (after 25 June 2013) are likely to define curtilage definitively; where this is (or is not) the case will be noted in the list description.

Cumulative Impact

28. The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies. Negative change could include severing the last link to part of the history of an asset or between the asset and its original setting. Conversely, positive change could include the restoration of a building's plan form or an original designed landscape.

Listed Building Consent Regime

29. Change to heritage assets is inevitable but it is only harmful when significance is damaged. The nature and importance of the significance that is affected will dictate the proportionate response to assessing that change, its justification, mitigation and any recording which may be needed if it is to go ahead. In the case of listed buildings, the need for owners to receive listed building consent in advance of works which affect special interest

is a simple mechanism but it is not always clear which kinds of works would require consent. In certain circumstances there are alternative means of granting listed building consent under the Enterprise & Regulatory Reform Act 2013.

Opportunities to Enhance Assets, their Settings and Local Distinctiveness

52. Sustainable development can involve seeking positive improvements in the quality of the historic environment. There will not always be opportunities to enhance the significance or improve a heritage asset but the larger the asset the more likely there will be. Most conservation areas, for example, will have sites within them that could add to the character and value of the area through development, while listed buildings may often have extensions or other alterations that have a negative impact on the significance. Similarly, the setting of all heritage assets will frequently have elements that detract from the significance of the asset or hamper its appreciation.

Design and Local Distinctiveness

53. Both the NPPF (section 7) and PPG (section ID26) contain detail on why good design is important and how it can be achieved. In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:

- The history of the place
- The relationship of the proposal to its specific site
- The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept
- The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size
- The size and density of the proposal related to that of the existing and neighbouring uses
- Landmarks and other built or landscape features which are key to a sense of place
- The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces
- The topography
- Views into, through and from the site and its surroundings
- Landscape design
- The current and historic uses in the area and the urban grain
- The quality of the materials

Note 3 'The Setting of Heritage Assets' (December 2017)

This note provides guidance on the setting of heritage assets, which is separate to issues of curtilage, character or context.

The Extent of Setting

8. The NPPF makes it clear that the extent of the setting of a heritage asset 'is not fixed and may change as the asset and its surroundings evolve'. All of the following matters may affect considerations of the extent of setting:
- While setting can be mapped in the context of an individual application or proposal, it cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time, and because new information on heritage assets may alter what might previously have been understood to comprise their setting and the values placed on that setting and therefore the significance of the heritage asset.
 - Extensive heritage assets, such as historic parks and gardens, landscapes and townscapes, can include many heritage assets, historic associations between them and their nested and overlapping settings, as well as having a setting of their own. A conservation area is likely to include the settings of listed buildings and have its own setting, as will the hamlet, village or urban area in which it is situated (explicitly recognised in green belt designations).
 - Consideration of setting in urban areas, given the potential numbers and proximity of heritage assets, often overlaps with considerations both of townscape/urban design and of the character and appearance of conservation areas. Conflict between impacts on setting and other aspects of a proposal can be avoided or mitigated by working collaboratively and openly with interested parties at an early stage.

Views and Setting

10. The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset.
11. Views which contribute more to understanding the significance of a heritage asset include:
- those where the composition within the view was a fundamental aspect of the design or function of the heritage asset
 - those where town- or village-scape reveals views with unplanned or unintended beauty
 - those with historical associations, including viewing points and the topography of battlefields
 - those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected
 - those where relationships between the asset and other heritage assets or natural features or phenomena such as solar or lunar events are particularly relevant

12. Assets, whether contemporaneous or otherwise, which were intended to be seen from one another for aesthetic, functional, ceremonial or religious reasons include:
 - military and defensive sites
 - telegraphs or beacons
 - prehistoric funerary and ceremonial sites
 - historic parks and gardens with deliberate links to other designed landscapes and remote 'eye-catching' features or 'borrowed' landmarks beyond the park boundary

13. Views may be identified and protected by local planning policies and guidance for the part they play in shaping our appreciation and understanding of England's historic environment, whether in rural or urban areas and whether designed to be seen as a unity or as the cumulative result of a long process of development. This does not mean that additional views or other elements or attributes of setting do not merit consideration. Such views include:
 - views identified as part of the plan-making process, such as those identified in the London View Management Framework (LVMF, Mayor of London 2010) and Oxford City Council's View Cones (2005) and Assessment of the Oxford View Cones (2015 Report)
 - views identified in character area appraisals or in management plans, for example of World Heritage Sites
 - important designed views from, to and within historic parks and gardens that have been identified as part of the evidence base for development plans, and
 - views that are identified by local planning authorities when assessing development proposals

Where complex issues involving views come into play in the assessment of such views – whether for the purposes of providing a baseline for plan-making or for development management – a formal views analysis may be merited.

Setting and the Significance of Heritage Assets

9. Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated (see below Designed settings). Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance. The following paragraphs examine some more general considerations relating to setting and significance.

Cumulative Change

Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the

restoration of a building's original designed landscape or the removal of structures impairing key views of it (see also paragraph 40 for screening of intrusive developments).

Change over Time

Settings of heritage assets change over time. Understanding this history of change will help to determine how further development within the asset's setting is likely to affect the contribution made by setting to the significance of the heritage asset. Settings of heritage assets which closely resemble the setting at the time the asset was constructed or formed are likely to contribute particularly strongly to significance but settings which have changed may also themselves enhance significance, for instance where townscape character has been shaped by cycles of change over the long term. Settings may also have suffered negative impact from inappropriate past developments and may be enhanced by the removal of the inappropriate structure(s).

Access and Setting

Because the contribution of setting to significance does not depend on public rights or ability to access it, significance is not dependent on numbers of people visiting it; this would downplay such qualitative issues as the importance of quiet and tranquillity as an attribute of setting, constraints on access such as remoteness or challenging terrain, and the importance of the setting to a local community who may be few in number. The potential for appreciation of the asset's significance may increase once it is interpreted or mediated in some way, or if access to currently inaccessible land becomes possible.

Buried Assets and Setting

Heritage assets that comprise only buried remains may not be readily appreciated by a casual observer. They nonetheless retain a presence in the landscape and, like other heritage assets, may have a setting. These points apply equally, in some rare cases, to designated heritage assets such as scheduled monuments or Protected Wreck Sites that are periodically, partly or wholly submerged, eg in the intertidal zone on the foreshore.

The location and setting of historic battles, otherwise with no visible traces, may include important strategic views, routes by which opposing forces approached each other and a topography and landscape features that played a part in the outcome.

Buried archaeological remains may also be appreciated in historic street or boundary patterns, in relation to their surrounding topography or other heritage assets or through the long-term continuity in the use of the land that surrounds them. While the form of survival of an asset may influence the degree to which its setting contributes to significance and the weight placed on it, it does not necessarily follow that the contribution is nullified if the asset is obscured or not readily visible.

Designed Settings

Many heritage assets have settings that have been designed to enhance their presence and visual interest or to create experiences of drama or surprise. In these special circumstances, these designed settings may be

regarded as heritage assets in their own right, for instance the designed landscape around a country house. Furthermore they may, themselves, have a wider setting; a park may form the immediate surroundings of a great house, while having its own setting that includes lines-of-sight to more distant heritage assets or natural features beyond the park boundary. Given that the designated area is often restricted to the 'core' elements, such as a formal park, it is important that the extended and remote elements of the design are included in the evaluation of the setting of a designed landscape. Reference is sometimes made to the 'immediate', 'wider' and 'extended' setting of heritage assets, but the terms should not be regarded as having any particular formal meaning. While many day-to-day cases will be concerned with development in the vicinity of an asset, development further afield may also affect significance, particularly where it is large-scale, prominent or intrusive. The setting of a historic park or garden, for instance, may include land beyond its boundary which adds to its significance but which need not be confined to land visible from the site, nor necessarily the same as the site's visual boundary. It can include:

- land which is not part of the park or garden but which is associated with it by being adjacent and visible from it
- land which is not part of the site but which is adjacent and associated with it because it makes an important contribution to the historic character of the site in some other way than by being visible from it, and
- land which is a detached part of the site and makes an important contribution to its historic character either by being visible from it or in some other way, perhaps by historical association

Setting and Urban Design

As mentioned above (paragraph 8, The extent of setting), the numbers and proximity of heritage assets in urban areas mean that the protection and enhancement of setting is intimately linked to townscape and urban design considerations. These include the degree of conscious design or fortuitous beauty and the consequent visual harmony or congruity of development, and often relates to townscape attributes such as enclosure, definition of streets and spaces and spatial qualities as well as lighting, trees, and verges, or the treatments of boundaries or street surfaces.

Setting and Economic and Social Viability

Sustainable development under the NPPF can have important positive impacts on heritage assets and their settings, for example by bringing an abandoned building back into use or giving a heritage asset further life. However, the economic viability of a heritage asset can be reduced if the contribution made by its setting is diminished by badly designed or insensitively located development. For instance, a new road scheme affecting the setting of a heritage asset, while in some cases increasing the public's ability or inclination to visit and/or use it, thereby boosting its economic viability and enhancing the options for the marketing or adaptive re-use of a building, may in other cases have the opposite effect.

Landscape Assessment and Amenity

14. Analysis of setting is different from landscape assessment. While landscapes include everything within them, the entirety of very extensive settings may not contribute equally to the significance

of a heritage asset, if at all. Careful analysis is therefore required to assess whether one heritage asset at a considerable distance from another, though intervisible with it – a church spire, for instance – is a major component of the setting, rather than just an incidental element within the wider landscape.

15. Assessment and management of both setting and views are related to consideration of the wider landscape, which is outside the scope of this advice note. Additional advice on views is available in Guidelines for Landscape and Visual Impact Assessment, 3rd edition, published by the Landscape Institute and the Institute of Environmental Management and Assessment (in partnership with Historic England).
16. Similarly, setting is different from general amenity. Views out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting.

A Staged Approach to Proportionate Decision-taking

17. All heritage assets have significance, some of which have particular significance and are designated. The contribution made by their setting to their significance also varies. Although many settings may be enhanced by development, not all settings have the same capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it. This capacity may vary between designated assets of the same grade or of the same type or according to the nature of the change. It can also depend on the location of the asset: an elevated or overlooked location; a riverbank, coastal or island location; or a location within an extensive tract of flat land may increase the sensitivity of the setting (ie the capacity of the setting to accommodate change without harm to the heritage asset's significance) or of views of the asset. This requires the implications of development affecting the setting of heritage assets to be considered on a case-by-case basis.
18. Conserving or enhancing heritage assets by taking their settings into account need not prevent change; indeed change may be positive, for instance where the setting has been compromised by poor development. Many places coincide with the setting of a heritage asset and are subject to some degree of change over time. NPPF policies, together with the guidance on their implementation in the Planning Policy Guidance (PPG), provide the framework for the consideration of change affecting the setting of undesignated and designated heritage assets as part of the decision-taking process (NPPF, paragraphs 131-135 and 137).
19. Amongst the Government's planning policies for the historic environment is that conservation decisions are based on a proportionate assessment of the particular significance of any heritage asset that may be affected by a proposal, including by development affecting the setting of a heritage asset. Historic England recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to the complexity of the case, from straightforward to complex:

Step 1: Identify which heritage assets and their settings are affected

Step 2: Assess the degree to which these settings 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 that 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

Historic England: Conservation Principles and Assessment (2008)

Conservation Principles (2008) explores, on a more philosophical level, the reason why society places a value on heritage assets beyond their mere utility. It identifies four types of heritage value that an asset may hold: aesthetic, communal, historic and evidential value. This is simply another way of analysing its significance. These values can help shape the most efficient and effective way of managing the heritage asset so as to sustain its overall value to society.

Evidential Value

35. Evidential value derives from the potential of a place to yield evidence about past human activity.
36. Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them. These remains are part of a record of the past that begins with traces of early humans and continues to be created and destroyed. Their evidential value is proportionate to their potential to contribute to people's understanding of the past.
37. In the absence of written records, the material record, particularly archaeological deposits, provides the only source of evidence about the distant past. Age is therefore a strong indicator of relative evidential value, but is not paramount, since the material record is the primary source of evidence about poorly documented aspects of any period. Geology, landforms, species and habitats similarly have value as sources of information about the evolution of the planet and life upon it.
38. Evidential value derives from the physical remains or genetic lines that have been inherited from the past. The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.

Historical Value

39. Historical value derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative.

40. The idea of illustrating aspects of history or prehistory – the perception of a place as a link between past and present people – is different from purely evidential value. Illustration depends on visibility in a way that evidential value (for example, of buried remains) does not. Places with illustrative value will normally also have evidential value, but it may be of a different order of importance. An historic building that is one of many similar examples may provide little unique evidence about the past, although each illustrates the intentions of its creators equally well. However, their distribution, like that of planned landscapes, may be of considerable evidential value, as well as demonstrating, for instance, the distinctiveness of regions and aspects of their social organisation.
41. Illustrative value has the power to aid interpretation of the past through making connections with, and providing insights into, past communities and their activities through shared experience of a place. The illustrative value of places tends to be greater if they incorporate the first, or only surviving, example of an innovation of consequence, whether related to design, technology or social organisation. The concept is similarly applicable to the natural heritage values of a place, for example geological strata visible in an exposure, the survival of veteran trees, or the observable interdependence of species in a particular habitat. Illustrative value is often described in relation to the subject illustrated, for example, a structural system or a machine might be said to have 'technological value'.
42. Association with a notable family, person, event, or movement gives historical value a particular resonance. Being at the place where something momentous happened can increase and intensify understanding through linking historical accounts of events with the place where they happened – provided, of course, that the place still retains some semblance of its appearance at the time. The way in which an individual built or furnished their house, or made a garden, often provides insight into their personality, or demonstrates their political or cultural affiliations. It can suggest aspects of their character and motivation that extend, or even contradict, what they or others wrote, or are recorded as having said, at the time, and so also provide evidential value.
43. Many buildings and landscapes are associated with the development of other aspects of cultural heritage, such as literature, art, music or film. Recognition of such associative values tends in turn to inform people's responses to these places. Associative value also attaches to places closely connected with the work of people who have made important discoveries or advances in thought about the natural world.
44. The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past, but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing

circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value.

45. The use and appropriate management of a place for its original purpose, for example as a place of recreation or worship, or, like a watermill, as a machine, illustrates the relationship between design and function, and so may make a major contribution to its historical values. If so, cessation of that activity will diminish those values and, in the case of some specialised landscapes and buildings, may essentially destroy them. Conversely, abandonment, as of, for example, a medieval village site, may illustrate important historical events.

Aesthetic Value

46. Aesthetic value derives from the ways in which people draw sensory and intellectual stimulation from a place.
47. Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time. Many places combine these two aspects – for example, where the qualities of an already attractive landscape have been reinforced by artifice – while others may inspire awe or fear. Aesthetic values tend to be specific to a time and cultural context, but appreciation of them is not culturally exclusive.
48. Design value relates primarily to the aesthetic qualities generated by the conscious design of a building, structure or landscape as a whole. It embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship. It may extend to an intellectual programme governing the design (for example, a building as an expression of the Holy Trinity), and the choice or influence of sources from which it was derived. It may be attributed to a known patron, architect, designer, gardener or craftsman (and so have associational value), or be a mature product of a vernacular tradition of building or land management. Strong indicators of importance are quality of design and execution, and innovation, particularly if influential.
49. Sustaining design value tends to depend on appropriate stewardship to maintain the integrity of a designed concept, be it landscape, architecture, or structure.
50. It can be useful to draw a distinction between design created through detailed instructions (such as architectural drawings) and the direct creation of a work of art by a designer who is also in significant part the craftsman. The value of the artwork is proportionate to the extent that it remains the actual product of the artist's hand. While the difference between design and 'artistic' value can be clear-cut, for example statues on pedestals (artistic value) in a formal garden (design value), it is often far less so, as with repetitive ornament on a medieval building.

51. Some aesthetic values are not substantially the product of formal design, but develop more or less fortuitously over time, as the result of a succession of responses within a particular cultural framework. They include, for example, the seemingly organic form of an urban or rural landscape; the relationship of vernacular buildings and structures and their materials to their setting; or a harmonious, expressive or dramatic quality in the juxtaposition of vernacular or industrial buildings and spaces. Design in accordance with Picturesque theory is best considered a design value.
52. Aesthetic value resulting from the action of nature on human works, particularly the enhancement of the appearance of a place by the passage of time ('the patina of age'), may overlie the values of a conscious design. It may simply add to the range and depth of values, the significance, of the whole; but on occasion may be in conflict with some of them, for example, when physical damage is caused by vegetation charmingly rooting in masonry. 53 While aesthetic values may be related to the age of a place, they may also (apart from artistic value) be amenable to restoration and enhancement. This reality is reflected both in the definition of conservation areas (areas whose 'character or appearance it is desirable to preserve or enhance') and in current practice in the conservation of historic landscapes.

Communal Value

54. Communal value derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical (particularly associative) and aesthetic values, but tend to have additional and specific aspects.
55. Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it. The most obvious examples are war and other memorials raised by community effort, which consciously evoke past lives and events, but some buildings and places, such as the Palace of Westminster, can symbolise wider values. Such values tend to change over time, and are not always affirmative. Some places may be important for reminding us of uncomfortable events, attitudes or periods in England's history. They are important aspects of collective memory and identity, places of remembrance whose meanings should not be forgotten. In some cases, that meaning can only be understood through information and interpretation, whereas, in others, the character of the place itself tells most of the story.
56. Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them. They tend to gain value through the resonance of past events in the present, providing reference points for a community's identity or sense of itself. They may have fulfilled a community function that has generated a deeper attachment, or shaped some aspect

of community behaviour or attitudes. Social value can also be expressed on a large scale, with great time-depth, through regional and national identity.

57. The social values of places are not always clearly recognised by those who share them, and may only be articulated when the future of a place is threatened. They may relate to an activity that is associated with the place, rather than with its physical fabric. The social value of a place may indeed have no direct relationship to any formal historical or aesthetic values that may have been ascribed to it.
58. Compared with other heritage values, social values tend to be less dependent on the survival of historic fabric. They may survive the replacement of the original physical structure, so long as its key social and cultural characteristics are maintained; and can be the popular driving force for the re-creation of lost (and often deliberately destroyed or desecrated) places with high symbolic value, although this is rare in England.
59. Spiritual value attached to places can emanate from the beliefs and teachings of an organised religion, or reflect past or present-day perceptions of the spirit of place. It includes the sense of inspiration and wonder that can arise from personal contact with places long revered, or newly revealed.
60. Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there.

