



Heritage Statement

Land between Gravel Hill Road and Brinsham Lane, Yate

Heidelberg

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Basis of Report

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Executive Summary

SLR Consulting Ltd was commissioned by Heidelberg to produce a Heritage Statement to inform revisions to the proposed construction of a temporary haul road to link Southfields and Brinsham West Quarries, Yate, with subsequent landscape restoration (planning ref. P22/02019/F). The Site amounts to approximately 1.25ha by area, is situated between Brinsham Lane and Gravel Hill Road, Chipping Sodbury, South Gloucestershire, and is centred at NGR ST 72307 84667. Revisions relate to the grade, exact route, passing spaces, and form of proposed screening vegetation and bund relative to the previous submissions. Full details are included with the planning submission.

Overall, the scheme results in a temporary (short to medium term) impact upon the significance of Little Brinsham Farmhouse as a Grade II Listed Building and upon a holloway and local historic landscape as non-designated heritage assets of low significance. **The impact upon the farmhouse would constitute less than substantial harm at the lowest end of the scale, allowing for mitigation measures.** Two sections of 'important' hedgerow, bounding Gravel Hill Road, would also be impacted (though these do not qualify under as heritage assets as per the standard definition). No impacts are anticipated in relation to the residual ridge and furrow earthworks within the Site area. Should any archaeological remains be encountered during the construction of the haul road, their significance will likely be lost or otherwise reduced, though the potential for significant remains of all dates is low. **The probability of encountering archaeological remains of national importance, such as would preclude the development, is negligible.**

Following restoration, any impacts upon the significance of Little Brinsham Farmhouse, hedgerows and the historic landscape would revert to nil. Some residual harm to the holloway would remain, owing to its reprofiling and loss of 'authenticity', though its contributions to landscape character and the significance of Little Brinsham Farmhouse would be restored.

The short to medium term impacts of the scheme will need to be considered in line with the requirements of the NPPF (2023), with full regard to the scheme's anticipated residual impacts. 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 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.



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1.0 Introduction



Figure 1: Site location and designated heritage assets

1.1 Project Background

SLR Consulting Ltd was commissioned by Heidelberg to produce a Heritage Statement to inform revisions to the proposed construction of a temporary haul road to link Southfields and Brinsham West Quarries, Yate, with subsequent landscape restoration (planning ref. P22/02019/F). The Site amounts to approximately 1.25ha by area, is situated between Brinsham Lane and Gravel Hill Road, Chipping Sodbury, South Gloucestershire, and is centred at NGR ST 72307 84667. Revisions relate to the grade, exact route, passing spaces, and form of proposed screening vegetation and bund relative to the previous submissions. Full details are included with the planning submission.

This report reviews the previous Heritage Impact Assessment prepared for the scheme in March 2022 by Tetra Tech, before providing up to date and specific consideration of the potential impacts of the revised scheme to any identified heritage assets with potential to be affected by the proposed haul road (op cit.). A review of the Conservation Officer's (Ian Gething) comments dated 5th June 2023, is also provided, offering clarity or reviewing subsequent changes to the scheme, as appropriate (comments are available on the planning portal for planning ref. P22/02019/F).

The previous assessment and Conservation Officer's comments confirm that the scheme is unlikely to impact upon the significance of any designated heritage assets aside from the Grade II Listed Little Brinsham Farmhouse (NHLE 1321122), which is sited 35m east of the Site. In addition, the Site contains a holloway and partial remains of ridge and furrow, which will also be affected. Following a review of the historical background and site description, this assessment will therefore focus on these assets alone.

This assessment has been prepared in compliance with the National Planning Policy Framework (NPPF) (2023), the South Gloucestershire Local Plan Core Strategy (2006 - 2027), and Historic England guidance, and with full regard to the ethical standards of the Institute of Historic Building Conservation (IHBC) and the Chartered Institute for Archaeologists (CIfA). Relevant local plan policies are included at the back of this report (**Appendix A**).



The methodology employed during this assessment was based upon relevant professional guidance, including the Chartered Institute for Archaeologists' *Standard and guidance for Historic Environment Desk-based Assessment* (ClfA 2020), and relevant technical guidance issued by Historic England, including *Statements of Heritage Significance: Analysing Significance in Heritage Assets* (2019). A methodology and glossary of key terms is included at the back of this report (**Appendix B**).

1.2 Site Description

The Site comprises part of a field between Brinsham Lane (to the north) and Gravel Hill Road (to the south) (Figure 1; Plate 1). The Site has been historically ploughed and is presently laid to grass (Photos 1 and 2). It incorporates an historical holloway feature, which runs south to north, formerly exiting onto Brinsham Lane.¹

The southern boundary follows the north side of Gravel Hill Road, with a short extension to its south side to link with the adjacent quarry. Gravel Hill Road is bounded by two mixed mature hedgerows. To its north, the Site is bounded by a grown-out hedgerow, self-sown vegetation, and modern post-and-wire fencing and a metal gate, crossing Brinsham Lane to extend into the woodland alongside a stream (Photos 3 - 5). To the east of the Site, the field rises towards a farm complex, known as Little Brinsham Farm (Photo 6). The farm is focused at the Grade II Listed Little Brinsham Farmhouse, situated 35m east of the Site. Rising to the west of the Site is a continuation of the field, for 250 metres.

The Site is largely insular, owing to the nature of its topography (the holloway) and bounding plantings. It is intervisible and proximal to Little Brinsham Farmhouse, which terminates easterly views. Views north and south terminate at mature woodland, while views west are terminated by the rise in topography in that direction.

1.2.1 Topography and LiDAR²

The Site slopes from south to north (from 94mAOD to 87mAOD), at first gradually, but then at a steeper grade, accommodating the holloway: an historical sunken track linking Brinsham Lane and Gravel Hill Road. The holloway remained in use as a footpath, and latterly a farm track, through the 20th century, though the 21st century Google Earth imagery indicates that it had gone out of use; certainly, as existing, the gate and track at Brinsham Lane is overgrown and very much disused.

The LiDAR imagery for the Site reveals faint traces of historical ridge and furrow earthworks within the Site area, being most prominent within the western part (outwith the footprint of the proposed development), and extending beyond the Site area (this is most visible on the Multi-Hillshade model; Plate 4). The form of the ridge and furrow, comprising narrow (c.3m in width), straight lands (ridges), is indicative of mid- to late post-medieval date of ploughing (the historic environment record [HER] data for the area confirms this, e.g., HER ref. 21386, 21379).³ The ridge and furrow within the eastern part of the Site can be seen to run perpendicular to that to the west of the Site, with the two sets comprising separate furlongs.

The form of the holloway is readily legible on LiDAR imagery of the Site cutting a path to the bottom of the Brinsham stream valley and Brinsham Lane (Plates 2 – 7). A steep bank forms the western edge

¹ A holloway, hollow-way, or hollow way, is defined within the Oxford Dictionary as a 'way, road, or path, through a defile or cutting', and within the Cambridge Dictionary as 'a walking path or road that is much lower than the land on either side of it, because the ground has eroded over time'.

² The Open Survey Data 2022 composite 1 m spatial resolution digital terrain model (DTM) was consulted during the assessment. Data was processed in Relief Visualization Toolbox (RVT version 2.2.3) before being imported into ArcGIS. The raw DTM was processed to form a series of outputs for archaeological prospection, being visualised with all automatic pre-sets. The LiDAR data was compared with historic mapping and aerial photography to aid interpretation. In each instance, a percentile clip was applied in ArcGIS to provide better contrast and visibility of archaeological features.

³ As a general rule, earlier ridge and furrow typically exhibits a characteristic reverse S form, and comprises of wider lands (c.9m in width), the result of ploughing with a single-edged plough and a team of oxen. Over time, ridge and furrow became narrower and straighter, as modern ploughing techniques were adopted. An example of earlier ridge and furrow earthworks can be seen to survive 250m northwest of the Site, in an area west of Brinsham Farm.



of the holloway, while there is a more gradual break in the slope to its east. At its northern end, the holloway steepens markedly as it descends towards Brinsham Lane.

The holloway's western bank may, in part, comprise a 'headland'. Headlands are agricultural features which formed over time from ploughing with a single-edged plough (typically through the medieval and early post-medieval period). When the plough was turned at the end of a furrow, it would be lifted and the oxen (latterly horses) turned across the headland, before returning in the opposite direction. Over time ground levels were built up. Headlands are typically broader than the adjacent ridge and furrow 'lands', and often survive where other ridge and furrow earthworks are lost or eroded by modern ploughing. A natural variation in topography appears to emphasise the headland in this instance, perhaps relating to a variation in underlying geology (the change in topography likely marked a logical break in the field system). A similar break in slope is visible north of the Brinsham valley, west of Brinsham Farm, on a similar alignment. Both alignments parallel the recorded variations in geology within the area.

This topographical and geological variation may have resulted in a natural weakness in the hillside down into the Brinsham valley, which could have been exploited as a footpath or trackway, becoming further incised over time through foot traffic, runoff, and ploughing, thus resulting in the holloway (this is considered further below).

Overlain historical mapping is presented alongside the LiDAR imagery on Plates 5 – 7, allowing for comparison of mapped features, and interpretation of aspects of the holloway's form.

Interesting comparison can be derived from the 1838 tithe map, particularly with regards to the north end of the holloway, which was, at least in 1838, crossed by a transverse field boundary (Plate 5). Traces of that transverse boundary are visible on the LiDAR, and appear to fully bisect the mouth of the holloway before it meets Brinsham Lane. No tracks are recorded on the mapping, but the positioning of the field boundary is unusual, and suggests that the form of the holloway, or at least the way in which it was used, may have differed at that time (if indeed it was in use / existed at all). For example, any footpath may have diverted sharply east around the field boundary, or ran through a very tightly spaced double gate to reach Brinsham Lane; both options are possible, though perhaps not probable.

Comparison with the 1898 Ordnance Survey mapping, however, shows the holloway very much in use, the transverse field boundary having been removed to the west by this time. Two intersecting footpaths debouched onto Brinsham Lane at the base of the holloway. The footpaths ran south, up hill, from Brinsham Lane before diverging to the south and east in turn (Plate 6). The eastern track curved, its mapped path coinciding with the beginning of the break of slope to the holloway as shown on the LiDAR imagery, to run straight towards the farmyard at Little Brinsham. The south-orientated track meanwhile paralleled the headland feature, before cutting steeply up its bank to coincide with a third path just southwest of the Site at Gravel Hill Road. The third path, in turn, ran northeast in a straight line, crossing the holloway to meet the eastern path at Little Brinsham.

Finally, comparison with the 1999 Google Earth imagery allows for extant features to be picked out against the LiDAR. Notably, a series of gouges in the western bank / headland feature can be seen to relate to cow tracks, clearly discernible on the aerial photography (and visible on subsequent Google Earth images also). A comprehensive map regression is included below.





Photo 1: Overview of the Site, facing north



Photo 2: Overview of the Site, facing south





Photo 3: Hedgerow to south side of the Site



Photo 4: View into the northern part of the Site, facing north from Brinsham Lane





Photo 5: Treeline on south side of Brinsham Lane alongside the Site



Photo 6: View across the Site area from its western boundary towards Little Brinsham Farmhouse





Plate 1: Google Earth imagery, 2024

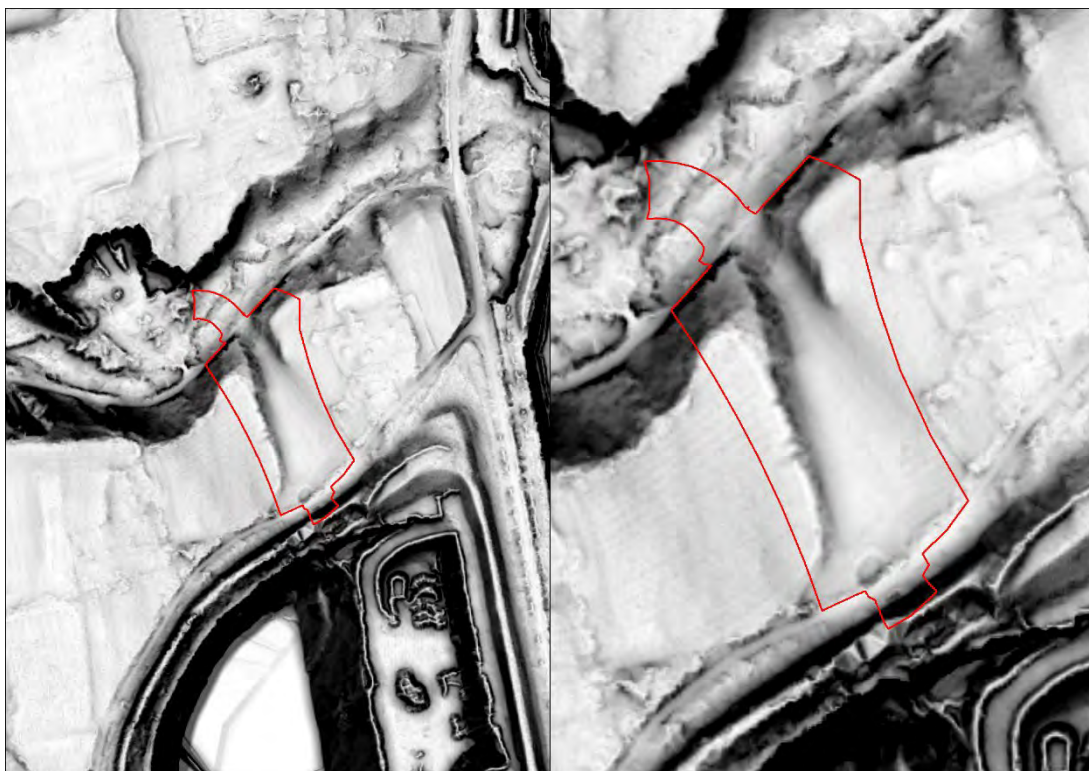


Plate 2: LiDAR – Slope Gradient / SVF composite



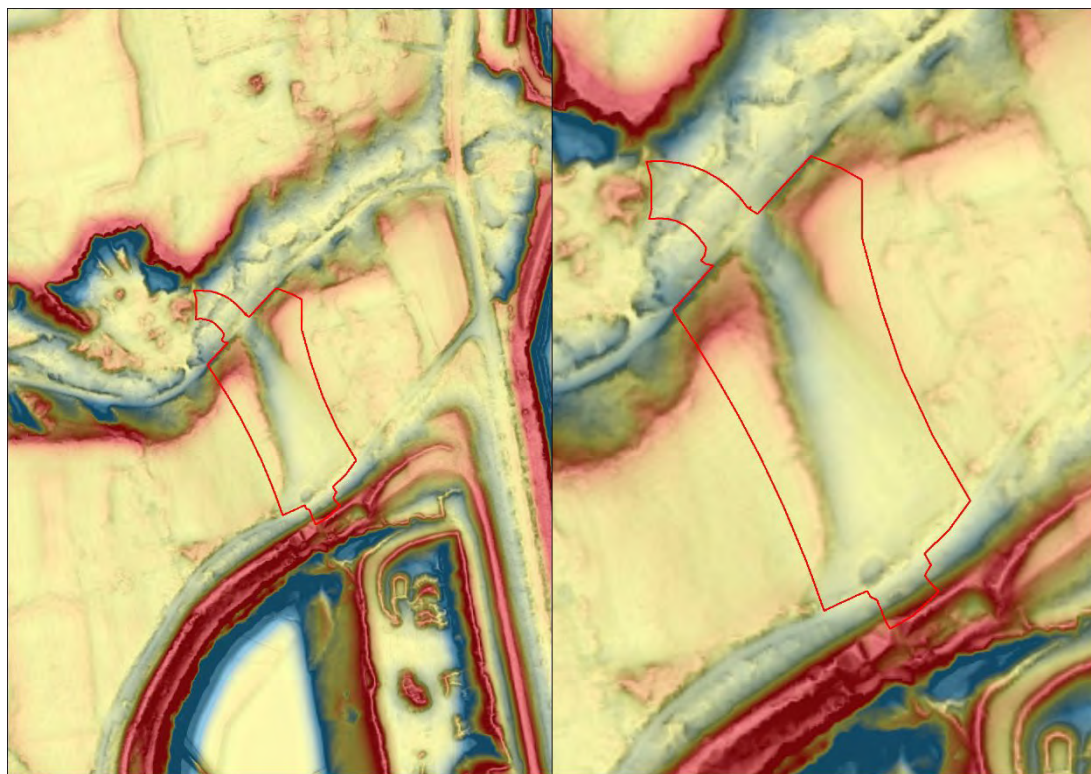


Plate 3: LiDAR – Slope Gradient / SVF composite with colourised SLRM overlay

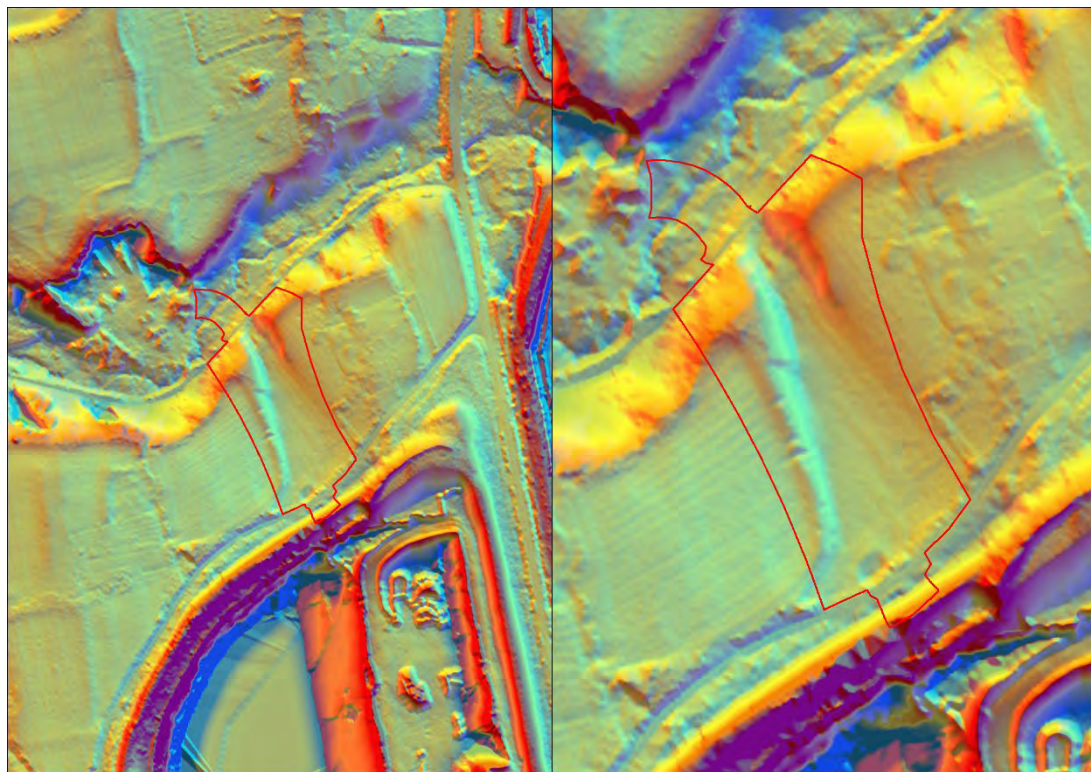


Plate 4: LiDAR – Colourised Multi-directional Hillshade





Plate 5: LiDAR – 1838 Tithe Map overlay on the LiDAR imagery

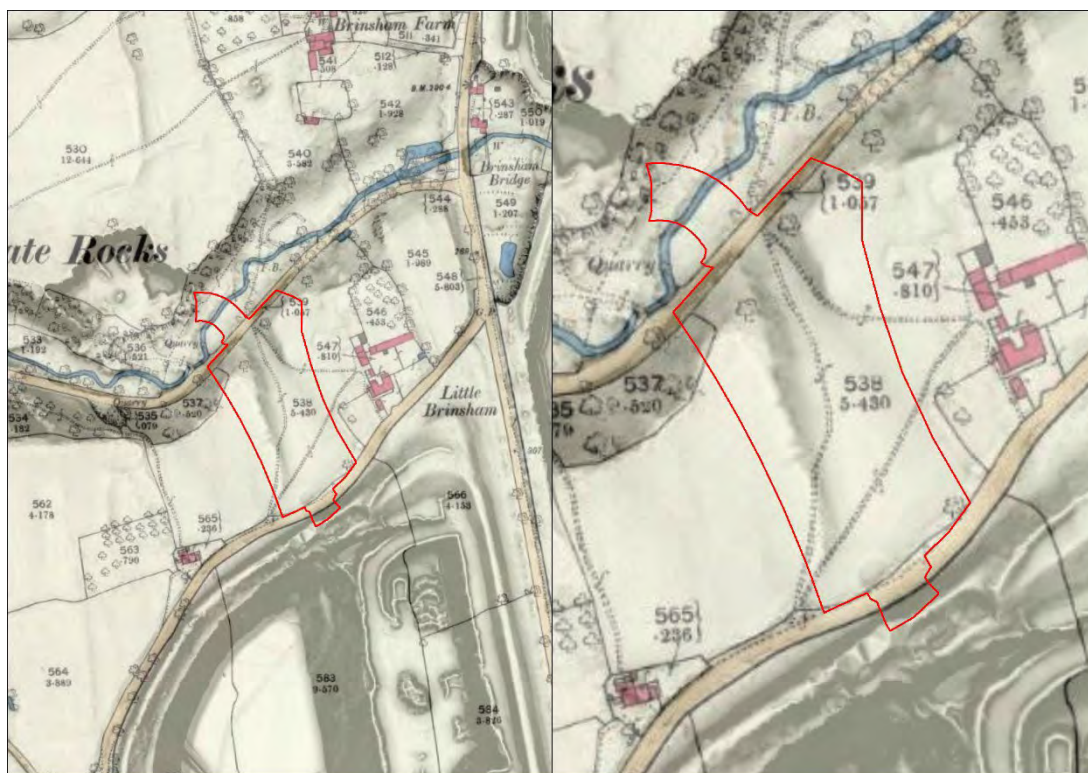


Plate 6: LiDAR – 1882 Ordnance Survey mapping overlay on the LiDAR imagery





Plate 7: LiDAR – 1999 Google Earth Imagery overlain on the LiDAR imagery

2.0 Historical and Archaeological Background

2.1 Summary

2.1.1 Prehistoric

No remains of known prehistoric date are recorded within the Site area. The report by Tetra Tech hazards that the holloway may have prehistoric origins (Tetra Tech 2022: 15). Certainly, if the holloway originated as a natural weakness in the valley side (a natural defile), then it is reasonable to consider that it may have been used for a long time. However, the existing form of the holloway is such that its evolved form, character, and appearance, is post-medieval, most likely dating to the later 19th century (see Section 2.1.4 below). This is reinforced by a review of historical mapping and by the holloway's spatial association with the former post-medieval ridge and furrow to its west and with the post-medieval farmstead of Little Brinsham to its east. Moreover, more natural or obvious routeways, such as the Wickwar Road, Brinsham Lane and Gravel Hill Road, exist within the surrounding landscape.

The nearest recorded prehistoric remains to the Site include a possible Iron Age sub-circular enclosure located 160m southwest of the Site (HER ref. 5273) and a small square enclosure (a possible house site) of possible Bronze Age date located 250m north of the Site (HER ref. 5272). Further Bronze Age enclosures are recorded 260m northeast of the Site.

There is clear evidence for prehistoric activity within the area surrounding the Site, with potential for the Site to have formed part of a prehistoric routeway. Nevertheless, there are no cropmarks indicative of enclosed activity within the Site area, nor are any of the identified earthwork features likely to date to this period. The nature of the holloway, as an eroded (cut) feature, is such that it is unlikely to be associated with any prehistoric features (pits, enclosures, etc.) or surfaces, if ever extant. If any such deposits were present, they would likely be preserved high on the banks of the holloway rather than its eroded base.

The probability of remains of prehistoric date being sited within the development area is low.



2.1.2 Romano-British

No remains of Romano-British date are recorded within the Site, nor within a 1km radius of the Site. Moreover, there is no evidence for cropmarks or earthworks of possible Romano-British date within the Site area.

Such a dearth of evidence is telling and suggests a low probability of Romano-British remains being present within the Site area.

2.1.3 Early Medieval to Medieval

The Historic Environment Record (HER) documents a settlement at Brinsham in 1182, collocated with Little Brinsham Farm c.35m east of the Site (HER ref. 9093). However, the report by Tetra Tech (2022: 16) notes that the first probable mention of Brinsham dates to 990, suggesting settlement in the area adjacent to the Site by at least the late Saxon / early medieval period. The settlement probably took the form of a hamlet or farmstead. The HER recounts that the medieval Brinsham manor house was likely located at the site of the Brinsham Farmhouse, 230m northeast of the Site (HER ref. 2086). The Tetra Tech report (2022: 27) recounts that:

The first probable mention of Brinsham is in an Anglo-Saxon charter of A.D. 990 (Sawyer 1362; KCD 675) where Oswald, archbishop of Worcester, grants to Æthelmær... Yate was originally in Henbury Hundred, which belonged to the Bishops of Worcester, and the grant made by Oswald is associated with that estate. Brynes hamme means 'Brȳni's water-meadow' which would be entirely appropriate for the location and would suggest the smallholding was close to the Brinsham Stream.

The report goes on to discuss the history of the Brinsham estate in detail (Ibid.: 27 – 29). The greater part of the discussion of the estate relates to its ownership and the house at Brinsham Farm, rather than the Site or Little Brinsham Farm (which appears to have been a tenanted property associated with the estate from the 17th century).

As discussed above (Section 1.2.1), evidence for ridge and furrow cultivation is present within the area surrounding the Site. While for the most part this appears post-medieval in date, an example of medieval ridge and furrow is visible c.250m north of the Site (and is also recorded in the HER) (HER ref. 17548). Further probable medieval ridge and furrow is recorded 320m northwest of the Site (HER ref. 21332).

It is likely that the Site was in agricultural use by the medieval period. The headland to the west side of the holloway may originate in part from this period, though the ridge and furrow earthworks are otherwise later in date. The origin of the holloway is uncertain, especially considering the Site depiction on the 1838 Tithe mapping (Plate 5 and 8), though it may have been in use at this time.

It is unlikely that the Site will contain any features of archaeological interest of early medieval to medieval date aside from these known features, though stray finds cannot be ruled out.

2.1.4 Post-Medieval to Modern

The Site contains remains of ridge and furrow earthworks of likely mid- to late post-medieval date. Again, the date of the holloway is unclear, though its form and character are determined in part by the headland to its west, and it is possible that it was in use during the earlier post-medieval period. It was certainly in use by the late 19th-century, however.

It is very unlikely that the Site will contain any features of post-medieval to modern date aside from these known features.

2.1.4.1 Map Regression

The map regression and documentary review within the Tetra Tech report are very broad, and do not address the development of the Site and its relationship to Little Brinsham Farm specifically; this is quickly reviewed here, therefore.

The earliest detailed mapping reviewed for the Site is the 1838 Tithe Map of Yate Parish (Plate 8). The mapping shows the Site as part of a field and copse, comprising a part of plots 684 and 685, adjacent to, and associated by, ownership and use with Little Brinsham Farm (plot 686). The northern



part of the Site, extending across Brinsham Lane, overlays part of plot 689 and, north of the Brinsham Stream, a small part of plots 692 and 693. The plots were all within the ownership of Reverend Henry Jones Randolph, as part of the Brinsham Estate. Plots 684, 685, 686, and 689 were occupied by Daniel Summers, tenant farmer at Little Brinsham House. Plots 692 and 693 were occupied by Jonathon Corbett, tenant at Brinsham Farm. Plot 684 is described as 'The Brake', pasture; Plot 685 (which comprises most of the Site area) as 'The Home Field', pasture; Plot 686 as 'House, Garden, and Orchard', homestead; Plot 689 as 'Little Lager', pasture; and Plots 692 and 693 as 'The Coombe' and 'Coombe Bottom', wood and pasture. Plot 685 comprised a single large field which extended east and west of the Site at the time. Some of the field boundaries suggest that the pattern of enclosure may have fossilised aspects of an earlier open-field system of agriculture, with field boundaries following former headlands (with a resulting reverse-S form). The mapping demonstrates that the existing woodland at the bottom of the Site and within the valley bottom was not extant in 1838. As discussed in Section 1.2.1, the form of Plot 284, with its transverse field boundary which cuts across the base of the holloway, is noteworthy, in so far as it calls into question the form, or use, or indeed existence, of the holloway at that time.

By 1882, Ordnance Survey mapping shows the Site in greater detail (Plate 9). Three footpaths are shown crossing the Site, in a triangular arrangement (see Section 1.2.1), converging to the north towards the bottom of the holloway, to the southwest corner of the Site, and to the east at Little Brinsham. Whatever the status of the holloway in 1838, it most certainly existed by 1882, its creation, or perhaps reuse, resulting from a shift in agricultural practice for Little Brinsham farm (Section 2.1.4.2 below). The mapping shows some of the pasture recorded on the Tithe map to be partially wooded by this time (e.g., plot 684). Some quarrying is shown immediately west of the Site's northern boundary, north of Brinsham Lane. The Site was superficially unchanged by 1903 (Plate 10). The quarrying northwest of the Site had been extended by this time.

By 1921, the Ordnance Survey mapping shows only a single footpath crossing the Site, following the holloway north to south, debouching to the southwest onto Gravel Hill Road (Plate 11). The quarrying had been extended again to the northwest of the Site. The same is shown on the 1955 and 1970 Ordnance Survey mapping (Plates 12 and 13). The 20th-century Ordnance Survey mapping shows a gradual change in the land use and character of the fields west of the Site, which only accelerated in the latter half of the century.

Indeed, by 1999, Google Earth imagery shows the landscape character of the Site, Little Brinsham Farm, and the fields to its west as changed, with the loss of former field boundaries and other historical landscape features (e.g., the orchard at Little Brinsham Farm) in favour of a sprawling modern field amalgamation (Plate 14). Such change is emblematic of the post-war intensification of agriculture, driven by national policy, technology, and economic incentives such as the Common Agricultural Policy, which saw extensive landscape change throughout the country, and extensive loss of hedgerows and historical landscape features (e.g., McCrone 1998: 57). Further landscape change occurred with the spread of quarrying to the south and east of the Site. Subsequent aerial photographs curated by Google Earth shows a shift in the use of the Site and land to its west occurred between 2014 and 2017, from pasture to feed crop (hay) (Plate 15).

2.1.4.2 Little Brinsham Farm

The farm at Little Brinsham, 35m east of the Site, dates to the mid- to late 17th century, while its associated outbuildings and landscaping (areas of cementitious hard standing, etc.) are late 19th – 21st-century in date (including stables, converted outbuildings, and large modern shed buildings) (NHLE 1321122; HER ref. 2913). The farm formed part of the Brinsham Estate, associated with Brinsham Farm 230m north of the Site.

The farm's development from the mid-19th century through to present day is presented as Plates 8 – 15. The farm underwent a significant remodelling between 1838 and 1882, with the farmhouse being extended to its rear with two new extensions, while outbuildings to its rear were demolished and new, larger, structures were introduced in their stead. A linear cow house / stable block was also replaced or extended. The changes to the farm appear to coincide with changes to the Site itself and relate to a possible change to the holloway feature (with the former field boundary at its base removed, and the two converging footpaths depicted). While the holloway *may* have been in use prior to this, the removal of the field boundary, alongside the remodelling of the farm related to a change in the intensity and nature of its use. Many farms underwent shifts in productivity and agricultural practice through the 'High Farming' years of the 1840s-70s. Such changes related not just to the physical



buildings within farm complexes, but also to the use and organisation of farmland and landscape: field amalgamation, intensified enclosure, mergers of farms, and an increase in animal husbandry:

There was a sharp increase in cattle numbers across the Region in the second half of the 19th century, accompanied by the increased use of imported fodder, cattle housing and more secure leases that encouraged tenants to invest in new farming methods. This period was one of major change, characterised by an increase in livestock specialisation... From the middle of the 19th century the national increase in demand for meat, milk and vegetables provided a buoyant market for products suited to the Region's pastoral systems, and for the second half of the 19th century and early 20th century, sheep and cattle breeding and dairying were the mainstays of the agricultural economy. (Historic England 2006: 31)

The change in the use, and, ultimately, form, of the holloway from this time would have related to the movement of cattle from Little Brinsham into the valley and beyond. The movement of cattle in larger numbers would likely have rapidly incised and altered (or indeed defined) its form.

In c.1911, the Brinsham estate was parcelled up for sale (Gloucestershire Archives Ref. D4855/2/1/2; Tetra Tech 2022: 29). The sales particular describes the Site as part of Lot 9, listed alongside Little Brinsham Farm, as a Pasture Field. The farm, tenanted by a Mrs Shipway at the time, is described thus:

The house contains 2 sitting rooms, back kitchen, scullery, pantry and dairy, 4 bedrooms and a large cheese room; and the buildings include stable for 2 horses, 2 cattle sheds, 2 wagon sheds, 2 pigstyes, fowl-house, and 2 yards.

The farm was sold again on 10th December 1947, as part of the estate of a Miss Catherine Anstey. At the time, the farm was tenanted by a Mr Alex Taylor (Tetra Tech 2022: 30). The particulars pay particular attention to the underlying limestone bedrock, probably with a view to their potential for extraction.

The farm complex appears to have been little changed through the early and mid 20th century. By 1999, however, it had been substantially modernised, with large modern cattle sheds and other similar outbuildings constructed to its north, in the stead of the farm's original orchard (Plate 14) (the sheds were constructed in 1997 and 1998 in turn: planning refs. 97/2155/P and 98/2582/P). Large areas of hardstanding had been introduced to the farm, eroding its historical character. To the rear of the farmhouse, further additions or extensions appear to have been constructed. Into the 21st century, the holloway appears to have gone out of use, owing to the need to move cattle into the valley or on to Brinsham Farm having ceased. Certainly, by 2017 the base of the holloway had overgrown (Plate 15). Through the late 20th and early 21st century, the farm complex was subdivided, with some of the former outbuildings being converted to housing (e.g., planning ref. P89/1901).





Plate 8: Tithe Map, 1838

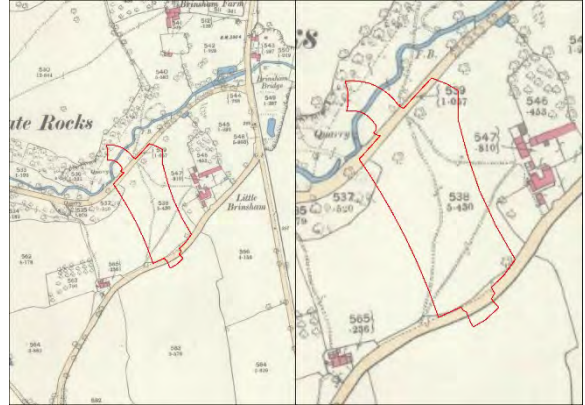


Plate 9: Ordnance Survey Map, 1882

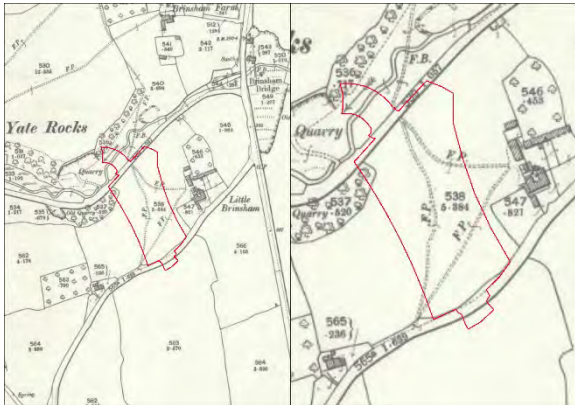


Plate 10: Ordnance Survey Map, 1903

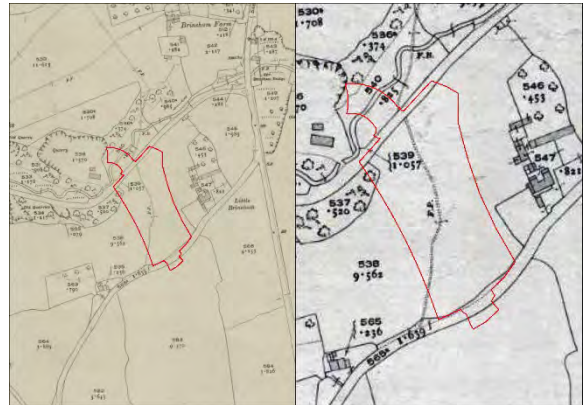


Plate 11: Ordnance Survey Map, 1921

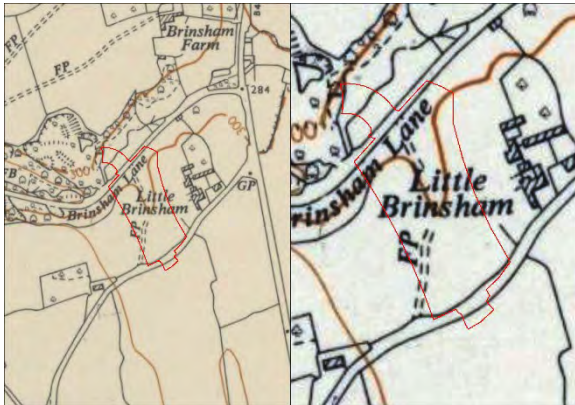


Plate 12: Ordnance Survey Map, 1955

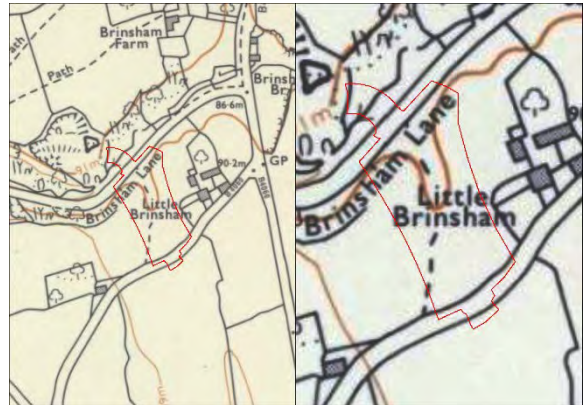


Plate 13: Ordnance Survey Map, 1970



Plate 14: Google Earth, 1999



Plate 15: Google Earth, 2017



3.0 Proposed Development

Full details of the proposed development are included with the planning application, which comprises updated plans, planning statement, LVIA, and ecology reports, prepared by SLR Consulting Ltd. The scheme is overlain on LiDAR imagery for comparison in Plates 16 and 17.

The scheme comprises the formation of a temporary haul road to link Southfields and Brinsham West Quarries with subsequent restoration within the Chipping Sodbury Quarry Complex. The intention is to use the existing holloway feature, owing to its alignment with the existing quarry to the south of Gravel Hill Road and the land to the north of Brinsham Lane.

The works will require the Site area to be regraded to accommodate a gradual break of slope, along the line of the holloway. A new retaining wall is anticipated to be necessary to the western end of the route before Brinsham Lane, owing to the depth of the road and risk of soil displacement from the adjacent bank. The retaining wall ensures any reprofiling to the bank here can be minimised.

Two passing spaces are proposed. The northern of these has been moved to the east to minimise impacts to the western bank of the holloway. The Conservation Officer noted:

In terms of further possible mitigation, it is noted that the western passing point is to the south of the haulage route which necessitates a considerable amount of regrading and reprofiling of the earthworks. Providing the length and arrangement of the passing place does not change, could it be repositioned to the north side? (Conservation Officer comments dated 5th June 2023)

Options for moving the passing space to the north of Brinsham Road were explored, but this presented further constraints in terms of space, ecology, and the stream. Moving it to the east reduced the amount of earth working required, and presented a compromised solution.

The screening bund and vegetation has been significantly reduced from the previous scheme, based on detailed modelling by SLR's landscape team. This is to reduce the impact of the bund itself (in terms of changes to historic landscape character), to facilitate restoration, and to minimise future conflict between restoration and potential future ecological and landscape baselines (e.g., from any matured vegetation or habitats formed during the lifetime of the haul road).

Following the operational phase of the haul road, it is proposed to restore the landscape to its existing form, including removal of the haul road surfacing and regrading of the holloway to its existing profile (save for the retaining wall which will be retained). Any mature screening vegetation will be transplanted to reinstate gaps in existing hedgerows created in the construction of the haul road.

The impacts, in terms of heritage, for the revised scheme will be assessed below, following a brief consideration of the significance of the Grade II Listed Little Brinsham Farmhouse (NHLE 1321122), the holloway, the remains of ridge and furrow within the site area, and the hedgerows at either end of the Site.





Plate 16: Proposed Development, overlain on LiDAR imagery (yellow contours relate to proposed changes)



Plate 17: Restoration Plan, overlain on LiDAR imagery (yellow contours relate to proposed changes)



4.0 Statement of Significance

4.1 Little Brinsham Farmhouse

Little Brinsham Farmhouse is designated at Grade II in recognition of its special architectural and historic interest. The greater part of that significance relates to its architectural interest as an example of a mid- to late-17th-century rubble-built vernacular farmhouse. Its historical interest relates primarily to its age and resultant rarity. The building has no meaningful associations with important historical people or events. The building's architectural interest is primarily focused on its principal three-bay, street-facing range, which includes a low cross-passage doorway, being less significant to its rear, where the building features two large mid- to late-19th-century, much altered, extensions: the extensions resulted in alterations to the building's planform, loss of fabric, and masked large sections of the rear elevation, thereby diminishing its legibility. The farmhouse's significance has been reduced by later alterations, including the replacement of its windows with late 20th-/21st-century double-glazed units. The interior of the building was not accessed as part of this assessment.

The farmhouse gains some significance from the group value it derives from the 19th-century farm buildings which define its former farm complex. These buildings are illustrative of the farm's mid-19th-century modernisation, as described above. The significance of the buildings, their functional associations with the farmhouse, and the degree to which they contribute to its significance in turn, has been reduced from the late 20th, into the 21st, century, with the conversion of the outbuilding immediately north of the farmhouse into a dwelling house ('Barn View', e.g. planning ref. P89/1901), and sale of the buildings into separate ownership. Other changes to the farm complex, such as the introduction of pervasive hard standing, the construction of the large modern agricultural shed buildings, and the loss of the farm's historical orchard, etc., have all further diluted the farmhouse's significance, such that it is much reduced from the time of its designated in 1984.

As set out within the historical background section to this report, the manner in which the farmhouse relates to the Site, in terms of its functional association, the presence of established tracks, and, it would appear, the use of the Site, has changed, such that the contribution the Site makes to the significance of the farmhouse is reduced. However, the Site area remains spatially and visually linked with the farmhouse, and retains aspects of its historical character, even though that character has changed. It is still possible to appreciate the historic functional link between the Site and farmhouse, and the relationship between the farmhouse and the holloway feature. The cessation in the use of the holloway, including the growth of mature vegetation at its base, has reduced the legibility of the feature, however. The mature hedgerows at the south end of the Site, as well as the residual ridge and furrow and headland to the west side of the Site, also make minor contributions to the significance of the farmhouse, collectively evidencing aspects of the farmhouse's historical setting and function. Therefore, it can be concluded that the Site makes a minor contribution to the significance of the farmhouse. Nevertheless, the greatest part of the building's special interest derives from its built form (its plan, fabric, evidence for phasing, etc).

4.2 The Holloway, Ridge and Furrow, and Hedgerows: Historic Landscape Character

4.2.1 The Holloway

The holloway has previously been discussed as a non-designated heritage asset, reflecting its significance as a tangible historical landscape feature. However, the previous report by Tetra Tech failed to give full consideration to its form and development. Research undertaken as part of this report suggests that, though it may have persisted and been used within the landscape prior to the 19th century, it was during the mid- to late-19th century that it took on its present form and appearance, likely relating to the movement of cattle from Little Brinsham Farm into the Brinsham valley. Such a reassessment provides greater clarity as to its particular significance and contribution to the significance of Little Brinsham Farm. The holloway does not present an original or early agricultural landscape feature in its present form, rather it evidences changes in agricultural practice and landscape management throughout the later 19th century. Nonetheless, as iterated by the Conservation Officer in their most recent comments on the scheme, dated 5th June 2023, the holloway is a non-designated heritage asset of *low, i.e. local, significance*.



4.2.2 Ridge and furrow

The remains of ridge and furrow are greatly denuded within the Site area (save for, the headland feature / west bank of the holloway) and fall largely outwith the area of proposed development. The nature of the remains, being likely post-medieval in date and poorly preserved, is such that they are not considered to comprise non-designated heritage assets in their own right, though they do contribute to our overall understanding of the historical landscape and post-medieval agricultural practices, and thus make a very minor contribution to the significance of Little Brinsham Farmhouse.

4.2.3 Hedgerows

The hedgerows which bound the Site at its southern end (to either side of Gravell Hill Road) comprise 'important' hedgerows, as per Part 4, Schedule I, Part II of the Hedgerows Regulations 1997. The hedgerows are greater than 30 years in age and delineate a field boundary which formed an integral part of a pre-Inclosure Act (i.e., pre-1845) field system, and thereby qualify as 'important' under Criterion 5(a) of the regulations.

Conversely, the plantings either side of Brinsham Lane do not qualify as 'important', as, although it would meet the test of being greater than 30 years in age and situated on the line of a pre-Inclosure Act boundary, the hedgerows have grown out into a tree lines: *Where a former hedgerow has not been actively managed and has grown into a line of trees, it is not covered by the Regulations* (DEFRA 1997: 12).

It is important to note that hedgerows, though they may contribute to historic landscape character, may contribute to significance as an aspect of setting, and may be a part of a heritage asset, do not qualify as heritage assets in their own right under the normal definition:

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. (PPG paragraph 039, Ref ID: 18a-039-20190723)

The southern hedgerows retain a good degree of historical character, which makes a very minor, generalised contribution to the significance of Little Brinsham Farmhouse as part of its setting; the hedgerow was likely planted as part of the enclosure of the farmland associated with the farmhouse, and therefore has a functional association with it, as well as contributing to a sense of rurality which underpins the listed building's former function. The grown out and less mature or species rich northern hedgerows appear to reflect a late 20th- or 21st-century character, reflecting a change in land management / use, and do not contribute to the significance of Little Brinsham Farmhouse.

4.2.4 Historic Landscape character

Both the previous Tetra Tech report and the Conservation Officer's comments on the scheme (dated 5th June 2023) assess the significance of the Site's landscape character in terms of the guidelines provided by the *Design Manual for Roads and Bridges* (DMRB), Volume 11, Part 3, Section 2, HA 208/07 (DMRB 2007), with regards to Table 7.1 of Annex 7 (Historic Landscape) of that publication. This resulted in a finding, based on the Tetra Tech interpretation of the landscape in relation to the Site, that the landscape was of 'High' value.

However, applying that same table to the Site and surrounding landscape, based on the assessment within this report, including a full consideration of the likely date of the holloway, the nature of the northern hedgerow, changes in the landscape through the 19th and 20th centuries, including changes to the adjacent farm and loss of its orchard, the landscape value should more appropriately be attributed as being 'Medium'. The DMRB defines a Medium value landscape as: *Averagely well-preserved historic landscapes with reasonable coherence, time-depth or other critical factor(s)* (DMRB 2007: A7/10). As such, it would comprise a non-designated heritage asset of local interest, or low significance.



5.0 Impact Assessment

5.1 Little Brinsham Farmhouse

5.1.1 Initial Impact Assessment

The Site makes a minor contribution to the significance of Little Brinsham Farmhouse as part of its setting. The proposed development will introduce new vehicular traffic, dust, and noise into the Site which will be experienceable within the context of the listed building, albeit for a period of 11 years, and only during operational hours. Additionally, the scheme will require alterations to landscape features (the holloway and southern hedgerows) which make a (limited) positive contribution to the farmhouse's significance (see Section 5.2). Those changes will further dilute the nature of the relationship between the Site and Little Brinsham Farmhouse, the Site's agricultural function will (temporarily) cease, and consequently the ability to understand the farmhouse's historical function and links to the land will be, in a specific and minor way, reduced: e.g., the landscape either side of the new haul road will remain, including substantial sections of hedgerow, along within its inherent contributions to the significance of the farmhouse.

The scheme would thereby result in less than substantial harm to the significance of Little Brinsham Farmhouse. With full regard to the changed nature of the association between the farm and the Site, the likely date of the holloway, and the contributions that the Site makes to the farm's significance, **that harm would be at the lower end of the scale (before mitigation)**, particularly as the greater part of the farmhouse's significance, as vested in its built fabric, will be preserved, as would its residual group value with its former farm complex and with other aspects of the surrounding historical landscape.

5.1.2 Mitigation

That harm has been factored into the development of the existing iteration of the scheme, with careful consideration of the proposed screening and bund which has been very much reduced from that previously proposed, to retain a maximum of the existing landscape character as possible, while adequately screening the haul road in views from the farmhouse. Thus, the way the landscape is experienced, beyond the intermittent noise of passing haul road traffic, will be largely unchanged when seen from Little Brinsham Farmhouse. The bund will be visible, but its low, grassed profile is such that it will read naturally within the existing fieldscape, and views beyond the Site across the fields associated with the farm will remain little changed (the same could be said of return views from the fields west of the farm). Similarly, the mature screening vegetation which will be introduced at the southern end of the haul road will read as an extension to the existing hedgerows at the Site's margins and will not interrupt any key views nor otherwise diminish the ability to appreciate the farmhouse's significance. As with any change, the impact will be greatest during or immediately post construction, though should naturalise within the short term.

Following mitigation, therefore, any harm to the significance of Little Brinsham Farmhouse during the operational phase of works would be very much reduced, falling **at the lowest end of the scale of less than substantial harm**. The overall and typical ways in which the significance of the farmhouse is presently experienced would remain unchanged, save for occasional, temporally limited, windows of activity, e.g., when passing vehicles are audible. The harm arising from the changes to the holloway (see below), and loss of the southern hedgerows will remain for the operational period, though the impact upon the significance of the farmhouse is minimal. This residual finding of harm differs from that given by the Conservation Officer in their most recent comments: the difference relates in part to the changes to the scheme, but also to a better understanding of the significance of the Site's historic landscape character, the holloway, and Little Brinsham Farmhouse.

5.1.3 Residual Impact Assessment

Finally, following cessation of the operation, the haul road will be removed, the holloway regraded to its existing profile, save for the retaining wall, and the hedgerows will be replanted. This will largely restore the Site's existing landscape character. Though the holloway will have been remodelled, the way in which it contributes to the historical narrative, landscape character, and significance of Little Brinsham Farmhouse will have been restored. The screening plantings will be used to plug the gaps



in the hedgerows, thus also restoring their existing appearance and minor contributions to the farmhouse. The residual harm following cessation of the temporary use is anticipated to be nil: a neutral change, or no harm. This is in accordance with the Conservation Officer's most recent comments, where he stated,

It is also acknowledged that this assessment of harm to the setting of the listed building would drop to neutral upon restoration of the landforms and reinstatement of the hedgerows and woodland (Conservation Officer comments dated 5th June 2023).

Nevertheless, it may be appropriate to reassess the proposed mitigation measures (the screening vegetation and bund) and their contributions to the significance of Little Brinsham Farm prior to restoration. This is because the works, particularly the bund and screening vegetation, will have matured and naturalised by that time. It is possible that they will be found to have a neutral impact upon the farmhouse's significance, and thereby their removal might be seen as unnecessary or even harmful against a future baseline (particularly when assessed alongside ecology and landscape and visual considerations).

5.2 The Holloway, Ridge and Furrow, and Hedgerows: Historic Landscape Character

5.2.1 The Holloway

The proposed development will result in the reprofiling of the holloway, the introduction of new surfacing and passing spaces, and the introduction of a small retaining wall at its northern end to support its western bank. This would affect its legibility as a 19th-century agricultural feature, thus resulting in a loss of significance for the holloway as a non-designated heritage asset. Any archaeological remains associated with the holloway may also be impacted upon by the works; however, the potential for significant remains relating to the holloway is low, likely confined to stray finds. The scheme is not entirely harmful, however, as it would bring the routeway back into use, restoring part of its function (and significance), even if in a somewhat contrived manner.

The proposed bund and screening vegetation would contribute to the reprofiling of the holloway but would not necessarily appear alien. The vegetation is a native mix and confined to a short area at the southern end of the Site, which should naturalise quickly. The screening bund is substantially reduced from the previous proposal, such that it would appear as a natural part of the historic agricultural landscape, and, in some ways, will define the eastern edge of the holloway during the period of the haul road's use.

Following termination of the haul-road use, the holloway will be restored to approximately its existing profile. Though this would not fully restore its significance, and though its form would be in part synthetic following restoration, it will, nevertheless, allow for its contributions in terms of historic landscape character and its contributions to the significance of Little Brinsham farmhouse to be restored. Some residual evidence for change will remain, however, in the form of the retaining wall, which is intended to be retained. This should be appropriate, as it will evidence what will have been a significant period of change for the holloway, which will doubtless have naturalised by that time, and as the wall will be well screened within the landscape. Options for regrading to incorporate (cover) the wall can be explored at the time of regrading if appropriate.

5.2.2 Ridge and Furrow

No impacts are anticipated in relation to the residual ridge and furrow and headland, as these fall outwith the area of development.

5.2.3 Hedgerows

Sections of hedgerow will be removed from both southern hedgerows and those to the north. The changes to the southern hedgerows will have a very minor and limited impact upon historic landscape character and Little Brinsham Farm, as discussed above. Following restoration, the residual impact would be nil. The hedgerows themselves will not be harmed in heritage terms as they do not meet the definition of a heritage asset in the NPPF sense.



5.2.4 Historic Landscape character

The scheme will have a temporary impact upon the significance of the historical landscape of the Site and its immediate environs as a non-designated heritage asset of low significance. That impact, under the terms of the DCMS (2007: A7/16) would be minor, resulting in:

Changes to few key historic landscape elements, parcels or components, slight visual changes to few key aspects of historic landscape, limited changes to noise levels or sound quality; slight changes to use of access: resulting in limited changes to historic landscape character.

The 'key historic landscape elements' which would be changed, though not lost, comprise the hedgerows and holloway. This results in a slight significance of effect, or a low degree of harm to a non-designated heritage asset. That impact would be moderated by the scheme's mitigation measures and would revert to nil following restoration.

6.0 Conclusion

Overall, the scheme results in a temporary (short to medium term) impact upon the significance of Little Brinsham Farmhouse as a Grade II Listed Building, and upon the holloway and local historic landscape as non-designated heritage assets of low significance. The impact upon the farmhouse would constitute less than substantial harm at the lowest end of the scale, allowing for mitigation measures. Two sections of 'important' hedgerow, bounding Gravel Hill Road, would also be impacted (though these do not qualify under as heritage assets as per the standard definition). No impacts are anticipated in relation to the residual ridge and furrow earthworks within the Site area.

Should any archaeological remains be encountered during the construction of the haul road, their significance will likely be lost or otherwise reduced, though the potential for significant remains of all dates is low. The probability of encountering archaeological remains of national importance, such as would preclude the development, is negligible.

Following restoration, any impacts upon the significance of Little Brinsham Farmhouse, hedgerows and the historic landscape would revert to nil. Some residual harm to the holloway would remain, owing to its reprofiling and loss of 'authenticity', though its contributions to landscape character and the significance of Little Brinsham Farmhouse would be restored.

The short to medium term impacts of the scheme will need assessed in line with the requirements of the NPPF (2023), with full regard to the scheme's anticipated residual impacts. 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. 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.



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Appendix A Relevant local planning policy

National Planning Policy Framework 2023

Applicable national policy comprises the National Planning Policy Framework (NPPF) 2023, and specifically the following paragraphs:

Paragraph 200, which 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...'

Paragraphs 205 and 206, which provide for designated heritage assets, and state respectively 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 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', and

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

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

Paragraph 207, which relates to instances of 'substantial harm', and states that:

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

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

Paragraph 208, which relates to instances of 'less than substantial harm', and states that:

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

Paragraph 209, which relates to non-designated heritage assets, and states that:

'The effect of an application on the significance of a non-designated heritage assets 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 state of any harm or loss and the significance of the heritage asset'.



South Gloucestershire Local Plan Core Strategy 2006 - 2027

POLICY CS9 – MANAGING THE ENVIRONMENT AND HERITAGE

The natural and historic environment is a finite and irreplaceable resource. In order to protect and manage South Gloucestershire’s environment and its resources in a sustainable way, new development will be expected to:

1. *ensure that heritage assets are conserved, respected and enhanced in a manner appropriate to their significance*
2. *conserve and enhance the natural environment, avoiding or minimising impacts on biodiversity and geodiversity*
3. *conserve and enhance the character, quality, distinctiveness and amenity of the landscape*
4. *be located away from areas of flood risk*
5. *reduce and manage the impact of flood risk through location, layout, design, choice of materials and the use of Sustainable Drainage Systems (SuDS)*
6. *protect the quality and quantity of the water environment and its margins*
7. *avoid the undeveloped coastal area*
8. *utilise natural resources, including minerals, soils and water, in an efficient and sustainable way*
9. *maximise opportunities for local food cultivation by (a) avoiding the best and most versatile agricultural land and; (b) safeguarding allotment sites*
10. *promote the re-use of contaminated land with appropriate remediation*
11. *protect land, air and aqueous environments, buildings and people from pollution and*
12. *avoid unstable land unless appropriate mitigation or remediation measures can be taken.*

POLICY CS10 – MINERALS

Supply

Provision will be made for the extraction of 58 million tonnes of crushed rock between 2008 and 2026 (which represents 60% of the West of England’s sub-regional apportionment) by maintaining a landbank of at least 10 years. In order to maintain this landbank, the existing Preferred Areas in the South Gloucestershire Minerals and Waste Local Plan will be rolled forward and any further resource requirement will be identified in the Policies, Sites and Places Development Plan Document.

Any proposal for the working of clay will only be allowed where it would support the level of capital investment required to maintain or improve Cattybrook Brickworks, or would meet a shortfall in the supply of clay to this brickworks.

Safeguarding

Mineral resources will be protected from permanent sterilisation by identifying Mineral Safeguarding Areas for the indicative hard rock and shallow coal resources identified by the British Geological Survey. These safeguarding areas will be defined in the Policies, Sites and Places Development Plan Document, together with consideration of the need to safeguard other mineral resources. Until then, the Mineral Resource Areas defined on the Proposals Map will remain in effect.





Appendix B Methodology and Glossary of Key Terms

Methodology

Standards

The assessment has been undertaken in accordance with all relevant statute, policy, and guidance. The assessment has been project managed and undertaken by Seth Price, Associate Heritage Consultant (MCIfA, AssocIHBC).

This assessment has been signed off by Dr Emma Wells, Technical Director - Historic Buildings (MCIfA), SLR Consulting.

Site visit

A site inspection was undertaken on 9th April 2024 to assess the site within its wider landscape context, identify any evidence for previous disturbance, and examine any known or suspected archaeological features. A settings assessment was also undertaken during the site visit, including visits to all nearby heritage assets.

Study area

A 500-metre study area was used to create a baseline for assessment, factoring any heritage assets beyond 500 metres where any meaningful visual, spatial, thematic, or historic functional association was identified.

Sources

The Gloucestershire Historic Environment Record (HER), and relevant map and document resources were consulted during the preparation of this report. The National Heritage List for England (NHLE) was consulted to provide information on scheduled monuments, registered parks and gardens, registered battlefields, and listed buildings. Available published and unpublished documents were consulted, and historic land-use has been reconstructed. Sources consulted are listed in the Bibliography section at the end of the report.

Key Terms

Heritage assets

The NPPF defines heritage assets 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).*

Significance

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

Current national guidance for the assessment of the significance of heritage assets expresses significance in terms of 'interests', as used within this report, and as per the NPPF definition (see *Statements of Heritage Significance: Analysing Significance in Heritage Assets*, Historic England 2019). Interests are analogous with 'special interest' as used within the Planning (Listed Buildings and Conservation Areas) Act 1990, and with the 'values' as set out in Historic England's *Conservation Principles, Policies and Guidance* (English Heritage 2008). The interests set out under the NPPF include:

- *Archaeological Interest: there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*
- *Architectural and Artistic Interest: these are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and*



decoration of buildings and structures of all types. Artistic interest is an interest in other human creative 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.*

These interests should not be seen as prescriptive, but rather as a guide for understanding the significance of a heritage asset; for example, a heritage asset may have interests beyond the scope of archaeological, architectural, or historic interest – they may have communal value or may be significant for their group value, etc.

This assessment was also informed by the advice published by Historic England in the document entitled *Managing Significance in Decision-Taking in the Historic Environment: Good Practice Advice in Planning Note 2* (2015).

Setting

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

The setting assessment within this report was guided by the recommendations outlined in *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning. Note 3* (Historic England 2017), which align with the general EIA process. The guidance advocates a staged approach to the assessment of the effects of development on the significance of heritage assets due to a change within their setting, using a five-step process:

Step 1: Identify which heritage assets and their settings are affected by the proposed development

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow their significance to be appreciated

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance of the identified heritage assets, or on the ability to appreciate it

Step 4: Explore ways to maximise enhancement and avoid or minimise harm to that significance

Step 5: Make and document the decision and monitor outcomes

Harm

Potential development effects (impacts) to heritage assets are discussed in terms of 'harm', with reference to the NPPF (2023). Harm, in heritage terms, relates to a negative effect stemming from a change which results in a diminishment of the significance of a heritage asset. The NPPF allows that harm may be either substantial or less than substantial and may vary within each category. How harm is assigned will trigger differing tests under the NPPF. Where harm to a designated heritage asset, or a non-designated heritage asset of equivalent significance, is identified, it must be given great weight in the planning decision. While it is up to the decision maker to determine the nature and degree of harm, they must take into account necessary expertise, and the particular significance of any heritage asset which may be affected (NPPF paragraph 201).

- *Substantial harm (or total loss of significance)*
An impact which results in a '*...total loss of significance...*' (NPPF paragraph 207). The National Planning Policy Guidance sets out that 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'. Substantial harm can be defined as having '...such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced'⁴; and

- *Less than substantial harm*
Being any lesser level of harm than that defined above; recent case law has confirmed that this includes any level of harm (not considered substantial) regardless of its quantification, e.g., the finding of a 'negligible' level of harm to a designated heritage asset must still be treated as less than substantial harm and be weighed in the balance under paragraph 208.

The PPG provides that the category of harm identified for any given asset be 'explicitly identified', and that the extent of that harm be 'clearly articulated'. For purposes of this assessment, this is done with reference to a 'spectrum', e.g., at the lower/upper end of the spectrum of less than substantial.

Where an impact, or harm to, the significance of a non-designated heritage asset is identified, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Where there is no harm to a heritage asset, an impact may be neutral (preserve) or may enhance its significance. The recent revisions to the Planning Act set out within The Levelling-up and Regeneration Act 2023 state that '*preserving or enhancing a relevant asset or its setting includes preserving or enhancing any feature, quality or characteristic of the asset or setting that contributes to the significance of the asset*'.

As clarified in the High Court, preservation does not mean that change is not possible; it specifically means no harm. This is echoed in GPA 2, which states that '*Change to heritage assets is inevitable but it is only harmful when significance is damaged*'.

⁴ *Bedford Borough Council v Secretary of State for Communities & Local Government & Anor* [2008] EWHC 2304 (Admin).





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