Bath and North East Somerset Core Strategy/Placemaking Plan Additional Evidence: Heritage Asset Study

Prepared by LUC in association with Bath and Regional Archaeological Services (BaRAS) and Conservation Studio

September 2013
**Project Title:** Bath and North East Somerset Core Strategy/ Placemaking Plan Additional Evidence: Heritage Asset Study

**Client:** Bath and North East Somerset Council

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Version Details</th>
<th>Prepared by</th>
<th>Checked by</th>
<th>Approved by Principal</th>
</tr>
</thead>
<tbody>
<tr>
<td>V1</td>
<td>28th Aug 2013</td>
<td>Draft Report</td>
<td>SY, IG, EB, RH</td>
<td>LC</td>
<td>LC</td>
</tr>
<tr>
<td>V2</td>
<td>11th Sept 2013</td>
<td>Draft Final report</td>
<td>SY, IG, EB, R</td>
<td>LC</td>
<td>LC</td>
</tr>
<tr>
<td>V3</td>
<td>12th Sept 2013</td>
<td>Final Report</td>
<td>SY, IG, EB, RH</td>
<td>LC</td>
<td>LC</td>
</tr>
</tbody>
</table>
## Contents

1. **Introduction**  
   - Background  
   - Study Aim and Scope  
   - Policy Context  
   - Summary of Proposed Development Sites  
   - Structure of Report  

2. **Methodology**  
   - Introduction  
   - Methodology  

3. **Key Findings**  
   - Site 1: Ensleigh  
   - Site 2: Weston  
   - Site 3: Odd Down  
   - Site 4: South West Keynsham  
   - Site 5: Whitchurch  
   - Site 6: East Keynsham  

**Appendix 1:** Ensleigh  
**Appendix 2:** Weston  
**Appendix 3:** Odd Down  
**Appendix 4:** South West Keynsham  
**Appendix 5:** Whitchurch  
**Appendix 6:** East Keynsham  
**Appendix 7:** General development impacts and mitigation measures in relation to archaeology
1 Introduction

Background

1.1 LUC in association with BaRAS and Conservation Studio were commissioned by Bath and North East Somerset Council (B&NES) to undertake an objective and detailed study of the impact of six greenfield development proposals on historic assets and their setting. The study outputs will be used to inform the preparation of the Core Strategy and the Placemaking Plan for B&NES.

1.2 B&NES’s Core Strategy is currently under Examination. Following Hearings in 2011 the Inspector issued his preliminary conclusions. In order to address the Inspector’s concerns set out in his preliminary conclusions, the Council agreed a set of Proposed Changes to its submitted Core Strategy on 4th March 2013. These changes increase the level of housing that is being planned for and propose development at six greenfield locations. These include:

- Extension to MoD, Ensliegh, Bath.
- Land adjoining Weston, Bath.
- Land adjoining Odd Down, Bath.
- Land adjoining South West Keynsham.
- Land at Whitchurch
- Land adjoining East Keynsham.

1.3 These greenfield locations will be identified and allocated for development in the Placemaking Plan (Site Allocations and Development Management Policies DPD). As such the Placemaking Plan will identify and allocate the precise sites/land to be developed.

1.4 This study seeks to provide robust and defensible evidence of the potential risk of development in the six broad locations to the significance of heritage assets and their settings. In addition to identifying the potential risks of development, the study provides guidance on the opportunities and strategies for mitigating these impacts. The study also seeks to identify how the potential risk to heritage assets varies within the different sites (ie between individual land parcels/fields).

Study Aim and Scope

1.5 The aim of the study is to assess the potential risk of the proposed six greenfield developments to historic assets and their setting. Specifically, this study considered the impact of the proposed development sites on:

- assets of archaeological interest and their setting including known and unknown archaeology in local vicinity;
- historic buildings and their setting including listed and undesignated buildings and local historic farmsteads;
- Conservation Areas and their setting;
- the setting of Registered Historic Parks and Gardens;
- the World Heritage Site (WHS) and its setting (please note that a separate study was undertaken by B&NES looking at the potential impact of the six development sites on the WHS. This study therefore uses the findings of the B&NES study).
1.6 The study provides a strategic assessment of the proposed risk of the developments to heritage assets. As detailed proposals for the sites are not available, the study cannot draw conclusive statements regarding the significance of the potential impacts. Detailed assessments would need to be undertaken as part of any subsequent planning applications and accompanying Environmental Impact Assessments (if the decision is taken to proceed with the allocation of these sites for development).

1.7 The study assesses the risk to the heritage significance of individual assets and the combined risk to heritage assets within different areas of the individual sites.

Policy Context

National Policy Context

1.8 Legislation relating to archaeology and Scheduled Monuments is contained in the Ancient Monuments and Archaeological Areas Act 1979. Legislation regarding buildings of special architectural or historic interest is contained in the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66 of the 1990 Act is relevant as it states that the decision maker, when exercising planning functions, must give special regard to the desirability of preserving a listed building and its setting. Section 72 of the 1990 Act provides protection for the character and appearance of Conservation Areas.

1.9 National planning policy is laid out in the National Planning Policy Framework (NPPF). Section 12 of the NPPF, entitled Conserving and Enhancing the Historic Environment, provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets. Overall, the objectives of Section 12 of the NPPF can be summarised as seeking to:

- deliver sustainable development;
- understand the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment;
- conserve England’s heritage assets in a manner appropriate to their significance; and,
- recognise the contribution that heritage makes to our knowledge and understanding of the past.

1.1 When considering development proposals, paragraph 129 of the NPPF states that:

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

1.2 In determining the significance of an impact on a heritage asset, paragraph 132 states 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. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”

1.3 Non-designated assets are also recognised in the NPPF with paragraph 139 stating that:
"Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets."

1.10 **Heritage Assets** are defined in Annex 2 of the NPPF as: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).

1.11 **Archaeological Interest** is defined as: a heritage asset which holds or potentially could hold evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.

1.12 **Designated Heritage Assets** comprise: World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefields and Conservation Areas.

1.13 **Significance** is defined as: The value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.

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

**Summary of Proposed Development Sites**

1.15 The list of proposed development sites was provided by B&NES, along with their GIS boundaries. The sites are proposed for residential development with the exception of the East Keynsham site which is also proposed for employment uses. The sites vary in size from around <120 dwellings to 300 dwellings. It is not known what form the developments will take, ie the potential height, density and design of the buildings. A list of the sites is provided in Table 1.1 below and their location is shown in Figure 1.1.

**Table 1.1: Proposed Development Sites**

<table>
<thead>
<tr>
<th>Site Number</th>
<th>Site Name</th>
<th>Proposed Development</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Extension to MoD, Ensleigh, Bath</td>
<td>&lt;120 dwellings</td>
</tr>
<tr>
<td>2</td>
<td>Land adjoining Weston, Bath</td>
<td>300 dwellings</td>
</tr>
<tr>
<td>3</td>
<td>Land adjoining Odd Down, Bath</td>
<td>300 dwellings</td>
</tr>
<tr>
<td>4</td>
<td>Land adjoining south west Keynsham</td>
<td>200 dwellings</td>
</tr>
<tr>
<td>5</td>
<td>Land at Whitchurch</td>
<td>200 dwellings</td>
</tr>
<tr>
<td>6</td>
<td>Land adjoining East Keynsham</td>
<td>250 dwellings plus employment uses</td>
</tr>
</tbody>
</table>
It is important to note that the boundaries of the sites for Ensleigh, Weston and Odd Down considered in this study do not exactly correlate with those covered in the B&NES Landscape and Visual Impact Assessment of the Bath World Heritage Site. Where this is the case, LUC has drawn conclusions about the potential risk to the Setting of the World Heritage Site for the land parcels which were not covered by the B&NES study. In the case of the Weston and Odd Down sites the evidence suggests that the excluded land parcels would pose a high risk to the setting of the World Heritage Site, if developed.

Structure of Report

The remainder of this report is structured as follows:

Chapter 2: Sets out the methodology that was used to undertake the study.
Chapter 3: Provides a summary of the key findings of the assessment.
Appendices 1-6 provide a detail write up of the assessment for each site in turn.
2 Methodology

Introduction

2.1 This chapter provides a brief summary of the methodology that was used to undertake the assessment. This includes a summary of the key data sources used.

Methodology

2.2 The study involved undertaking five key tasks which are outlined below:

Task 1: Desk Based Assessment

2.3 The first task involved gathering all the necessary data and information relevant to the key sites.

Key data sources and supporting information

2.4 The key data sources included:

- the Bath & North East Somerset (B&NES) Historic Environment Record (HER). A complete set of data was provided by B&NES Council, with additional recent material not yet on the HER provided by B&NES’s Archaeological Officer. Data for part of the 1km zone around the Whitchurch site was provided by the Bristol City Council HER, and for a similar area north of the Keynsham East site by the South Gloucestershire Council HER.
- the Historic Landscape Characterisation for the former County of Avon, provided by B&NES Council.
- the early 19th-century Tithe Maps for each parish, obtained from Bath Record Office, Bristol Record Office and material held by BaRAS.
- Ordnance Survey 1st (1880s), 2nd (1900s) and 3rd/Revised (1920s/30s) Edition mapping, mostly supplied by the B&NES HER, supplemented by existing BaRAS material.
- air photos held by the English Heritage (EH) Archive at Swindon. A number of images held by BaRAS were also examined.
- B&NES Core Strategy and supporting documents – such as the Urban Extension Environmental Capacity Appraisals.
- Landscape and Visual Impact Assessments for World Heritage Site and AONB for Bath Strategic Locations.

2.5 Historical research was not carried out. A short historical background for each site was compiled from existing work, supplemented by other published data as necessary. Relevant references are provided in each Appendix.

GIS layers

2.6 The key GIS data used included:

- Proposed development sites
- World Heritage Site boundary and related GIS evidence.
- OS (25k) base map tiles.
- English Heritage statutory sites (Registered Parks and Gardens; Registered Battlefields; Scheduled Monuments and Listed Buildings) – accessed from English Heritage NMR.
- HER GIS Records.
• Detailed height data - ie Digital Terrain Model and Digital Surface Model.

2.7 A GIS ArcReader published map of digital data for each development site was prepared covering the site itself, all features of historic interest within 1km of the proposed development site and a broad landscape-scale assessment within 5km of the proposed development site.

GIS Analysis: Zone of Theoretical Visibility (ZTV)

2.8 GIS was also used to prepare a series of maps showing the Zone of Theoretical Visibility (ZTV) for each development site. Three-dimensional computer modelling programmes were used identify the ZTVs of the proposed developments, highlighting the areas from where the development may be theoretically visible. The ZTVs were based on a Digital Surface Model (DSM) data which does take account of existing buildings or vegetation, albeit it provides smooth contours between features so it does not exactly replicate existing features.

2.9 As the exact height of the proposed developments was not known, ZTV’s were run for both two storey (9m to roof top) and three storey (13m to roof top) developments across each site. The ZTVs helped to identify which heritage assets are likely to be visible from the proposed development sites. Reverse ZTVs were also run for key heritage assets. These were used to show the zone of theoretical visibility from the asset in question. This helped to identify what specific areas of the development sites may be visible from key heritage assets. The ZTVs for each site are provided in the relevant appendices.

Review of information

2.10 A desk-based assessment was then undertaken of each proposed development site in turn, reviewing all relevant historic data. This review was undertaken with reference to the Standard and Guidance: for Historic Environment Desk Based Assessment (Institute for Archaeologists, November 2012). The assessment aimed to be a broad appraisal rather than a fully-detailed desk-based assessment as defined by the IfA standards.

2.11 Analysis of cartographic evidence was restricted to the maps listed above. A coverage search was obtained from EH for both vertical an oblique air photos. The analysis focused on vertical images and a representative selection was made from these, ensuring a far as possible that a range of dates was covered. The images examined are listed in the Appendices.

2.12 Only a brief assessment of hedgerows was undertaken, based purely on map evidence and considering only criteria 1-3 of Part II Schedule I of the Hedgerow Regulations 1997, i.e. the hedgerow:

1. marks the boundary of at least one historic [pre-1850] parish or township.
2. incorporates an archaeological feature which is Scheduled or recorded on an HER at the relevant date.
3. is fully or partly within an archaeological site covered by 2 above, or adjacent to or associated with it.

2.13 Detailed historical analysis as described in criteria 4 and 5 was not feasible due to the constraints of the study.

2.14 The assessment drew together all known evidence of both designated and non-designated heritage assets that have the potential to be affected by the proposed developments. This included the information on the following:

• Known and unknown archaeology on the site and in the vicinity including a summary of the chronology of the identified assets:
  • Prehistoric 500,000 BC – AD 42
    ➢ Palaeolithic 500,000 – 10,000 BC
    ➢ Mesolithic 10,000 – 4,000 BC
    ➢ Neolithic 4,000 - 2,200 BC
    ➢ Bronze Age 2,600 – 700 BC
    ➢ Iron Age 800 BC – AD 42
  • Roman AD 42 – 410
As outlined above, the scale of analysis considered a broad landscape scale review at 5km from the proposed sites identifying key historic sites that may be affected by the development, and a more detailed in depth study of the sites themselves and up to 1km from the proposed sites.

For the purpose of this report, the term ‘site’ refers to the areas within the site boundaries and the term 'study area' refers to the area within 1km of the site boundary. Please note that in other B&NES studies the 'site' (as defined in this study) is referred to as the 'study area'.

Task 2: Site Visits

Site visits were undertaken in August 2013 by LUC, BaRAS and Conservation Studio to check the potential impacts on known and unknown archaeological remains and their setting. This included assessing how each development site can be viewed from key sites and assets of historic importance. It also included taking photographs to illustrate key points that are made in the Appendices.

As agreed with B&NES, the visits to the sites themselves were restricted to public rights of way. It was therefore not possible to examine the land surface and topography in detail. Significant archaeological features and existing impacts observed are noted in the relevant appendices for each site, but the absence of a reference should not be taken as necessarily indicating the absence of a feature on the ground.

All digital photographs taken by BaRAS will be retained at BaRAS’s office in St Nicholas Church, Bristol. The project is included on the English Heritage Online Access to the Index of Archaeological Investigations (OASIS) website.

Task 3: Assessment of Sensitivity and Risk

Known Assets

Following identification of the key heritage assets, an assessment was undertaken of significance of the known heritage asset. This included consideration of the significance of the heritage asset and the contribution made to that significance by its setting. This assessment of significance was then used to undertake an assessment of the sensitivity of the heritage asset to the proposed development.

Sensitivity

Assets considered to be of high heritage significance (of national or international importance) are deemed to be highly sensitive to development. Assets of regional importance (ie Local Authority designated sites, undesignated sites of regional importance) are considered to be of medium sensitivity and assets of local/ site level importance (ie sites of interest to local interest groups or where the heritage significance of the site is limited by poor preservation or poor survival of contextual associations) are deemed to be of low sensitivity.

Risk

Following on from assessment of the sensitivity, an assessment was undertaken of the potential risk to the significance of a heritage asset. This took account of:
a) the sensitivity of the asset
b) the scale or magnitude of potential impacts of the proposal on the asset.

2.23 A summary of how risk was defined is provided in Table 2.1 below:

Table 2.1: Definition of Risk to Known Archaeological Assets

<table>
<thead>
<tr>
<th>Potential Risk</th>
<th>Definition of Potential Risk to Known Heritage Assets</th>
</tr>
</thead>
<tbody>
<tr>
<td>High</td>
<td>Asset is of high or medium sensitivity and the magnitude of the potential impact will be of such a scale that the significance of the heritage asset would be substantially harmed.</td>
</tr>
</tbody>
</table>
| Medium         | Asset is of high or medium sensitivity and the magnitude of the potential impact will be of such a scale that the significance of the asset would be harmed.  
or  
Asset is of low sensitivity but the impact will be of such a scale that the significance of the impact would be substantially harmed. |
| Low            | Asset is of high, medium or low sensitivity and the potential impact will be of such a minimal scale that the significance of the asset will not be harmed.  
or  
Asset is of low sensitivity but the scale of the impact will be of such a scale that the significance of the asset would be harmed. |

2.24 Please note that the above table was used as a guide only. Professional judgement was also used to inform the final decision regarding the degree of risk.

Unknown archaeological assets (buried archaeological remains)

2.25 This report uses the following scale to assess the risk of encountering unknown buried archaeological remains during development:

- **High Risk**: High likelihood of discovery of important hidden archaeology indicated by undisturbed nature of ground and presence of important archaeology on or very close to the site.
- **Medium Risk**: Likelihood of discovery of hidden archaeology indicated by undisturbed nature of ground and/or notable presence of archaeology close to the site.
- **Low Risk**: Some possibility of discovery of hidden archaeology indicated by undisturbed nature of ground and/or limited presence of archaeology within the vicinity of the site.
- **Minimal Risk**: Little possibility of discovery of hidden archaeology due to previous development of site and/or ground disturbance.

2.26 In the absence of further investigation the possible presence of unknown buried archaeological remains of high sensitivity cannot be discounted at any site and any assessment of risk can only be provisional.

**Task 4: Assessment of Combined Risk**

2.27 In addition to assessing the potential risk of a proposed development to individual heritage assets, an assessment was also undertaken of the potential impact of a development on the collective value of the heritage assets. This involved overlaying the findings of the assessment of impacts on known heritage assets and their setting for archaeology (and undiscovered archaeology), historic buildings, Conservation Areas, Registered Historic Parks and Gardens, and
the WHS etc. Summary tables and accompanying maps were prepared setting out how the potential risk for each of these types of heritage asset varies within different areas (i.e. field parcels) of the individual sites. The tables then make an overall judgement on the combined risk to heritage assets within each area of the site. This combined judgement is based on professional opinion but where an asset of national or international importance (high sensitivity) has been identified and is at high risk, the overall judgement is also concluded to be high. The only exception is for assets where there spatial distribution is not exactly known. For example, in the Weston Site, lynchets have been found within some fields within the site and whilst the overall assessment has concluded that the risk to heritage assets of development within this field is medium, it is dependent on the extent of the lynchets which would need further investigation.

Task 5: Recommendations and Reporting

2.28 The findings of this report should be considered in relation to the NPPF, and in the identification of sites as part of the Placemaking Plan. Table 2.2 sets out how the findings of this study should be interpreted in the context of the NPPF.

Table 2.2 Policy Framework and Recommendations

<table>
<thead>
<tr>
<th>Level of Risk</th>
<th>Policy Framework and Recommendations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Red Areas</strong></td>
<td>There is a high risk that development will cause substantial harm to the significance of a one or more designated heritage assets, or non-designated heritage assets of demonstrably equivalent significance, and/or their settings. Therefore development of these areas should be exceptional or wholly exceptional depending on the nature of the asset* (NPPF 132 and 139). Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, 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: • the nature of the heritage asset prevents all reasonable uses of the site; and • no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and • conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and • the harm or loss is outweighed by the benefit of bringing the site back into use. (NPPF Para 133)</td>
</tr>
<tr>
<td><strong>Orange Areas</strong></td>
<td>There is a medium risk that development will cause harm to the significance of one or more designated or non-designated heritage assets of demonstrably equivalent significance, and/or their settings. 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 securing its optimum viable use. (NPPF 129 and 134).</td>
</tr>
<tr>
<td><strong>Green Areas</strong></td>
<td>There is a low risk that development will cause harm to any designated or non-designated heritage assets of demonstrably equivalent significance, and/or their settings.</td>
</tr>
</tbody>
</table>
Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. (NPPF, para 132)

2.29 Please note that the above table only relates to designated or non-designated heritage assets of demonstrably equivalent significance. In some instances the sensitivity of the heritage asset is not known e.g. the Lynchetts in Weston and further investigation would be required to ascertain their status.

2.30 The results of the assessment of sensitivity and risk and combined risk are summarised in Chapter 3 of this report. The results of the detailed analysis for each site are set out in Appendices 1-6 of this report using the following structure:

1. Location
2. Planning Context
3. Sources of Evidence
   Summary of key sources of information used for each particular site.
4. Overall Heritage Assets
   Summary table and maps showing what heritage features lie on-site and within 1km and 5km. This includes the maps showing the Zones of Theoretical Visibility (ZTV).
5. Evidence
   Summary of evidence and significance of the heritage assets:
   - Archaeology
   - Historic buildings
   - Conservation areas
   - Registered Historic Parks and Gardens
   - World Heritage Site

5. Sensitivity and Risks
   - Assessment of the sensitivity of the heritage assets to the proposed development.
   - Assessment of the potential risk of a direct impact or impact on the setting of the heritage assets.
   - Summary of combined risk

6. Mitigation and Enhancement

2.31 Appendix 7 of this report sets out a number of general notes on development impacts and mitigation measures in relation to archaeology.
3 Key Findings

Introduction

3.1 The following chapter provides a brief overview of the sites and a summary of the risk of each proposed development to the significance of the identified heritage assets. An overview is also provided of the combined risk of the proposed developments to the heritage assets. Each section concludes with a summary of the key mitigation and enhancement measures that could be implemented to help minimise the risk to the heritage assets.

3.2 Please note that mitigation and enhancement measures are only provided in relation to areas which have been identified as low or medium risk. As outlined in the NPPF and Table 2.2 of this report, development in areas of high risk should be exceptional or wholly exceptional and therefore avoided as there is a risk that development could cause substantial harm to the designated heritage assets, or non-designated heritage assets of demonstrably equivalent significance, and/or their settings.

3.3 Full appendices for each site are provided in Appendix 1-6 and should be referred to for the full detail. Where possible summary maps included in this study cross reference land cells used in other evidence produced to inform the Core Strategy/Placemaking Plan. This is for ease of cross-reference.

Site 1: Ensleigh

3.4 The following provides a summary of the study findings in relation to Ensleigh. Please refer to Appendix 1 for the full detailed assessment.

Site Location and Context

3.5 The potential development site at Ensleigh is situated to the north of Bath city centre on the Lansdown plateau. The site comprises the Royal High School playing field, a flat, rectilinear sports field of approximately 4.1 hectares. The Core Strategy consultation document identifies the site for residential-led mixed use development of around 120 dwellings in the plan period, although the housing figure given relates to a larger site which includes the adjacent field to the west. This study considers the Royal High School playing field only.

3.6 To the east and south of the field lies the MoD Ensleigh site which began decommissioning in September 2012. To the west and north lie further school sports pitches.

3.7 The surrounding area is predominantly open countryside, with areas of woodland and dense vegetation on the hillside to the north east, and small clusters of farm and residential buildings. Lansdown cemetery and Beckford’s Tower, a Grade I listed structure and local landmark, are situated on the other side of Lansdown Road, to the south west of the site.

Summary of Risk to Heritage Assets

Archaeology

3.8 There are no known archaeological assets on the site, and therefore no risk to known assets on the site itself. Development on the site is not considered to present any risk to the archaeological setting of any known asset in the study area.

3.9 The study area as a whole, including the site, is considered to have moderate to high potential for unknown archaeological remains of the later prehistoric and Roman periods within its overall extent. There is, however, no evidence for major settlement or intensive occupation over the entire area. Occupation is likely to have been in the form of scattered farmsteads, but these can be expected to form localised foci and would typically be surrounded by areas containing remains...
associated with field systems. The site is considered to present a medium risk of development encountering unknown archaeological occupation and activity sites, indicated by the presence of flint artefacts and medieval field remains on the site, and later prehistoric and Roman occupation sites in the vicinity.

3.10 In the absence of further investigation the possible presence of unknown buried archaeological remains of high sensitivity cannot be discounted, and any assessment of risk made here can only be provisional.

Historic Buildings

3.11 The proposed site lies approximately 220m to the north east of Beckford’s Tower, and would be visible in views from the top of it. Development of the Ensleigh site would not affect its heritage significance as a significant Georgian building and major landmark, or its relationship with Lansdown Crescent.

3.12 The main views important to the setting of the tower are to the south west. Views in this direction would not be affected by development at Ensleigh. Views north eastwards from the top of the tower do however look across the former MOD site. Development of the playing field behind the MOD site (ie the proposed site) would add little additional risk to this. The buildings and structures identified as being related to the tower would not be affected by development.

3.13 The proposed development will therefore be of low risk of affecting the heritage significance of the tower and its setting.

3.14 Development of the site would also not affect the heritage significance of any other historic buildings.

Conservation Areas

3.15 There are two Conservation Areas within 1km of the proposed site Bath Conservation Area and Charlcombe Conservation Area. The setting of the Bath Conservation Area is unlikely to be affected due to the site being situated on the plateau, behind intervening development (on the MOD site) and vegetation. The proposed development will therefore be of low risk of affecting the heritage significance of Bath Conservation Area.

3.16 The open countryside setting to the Charlcombe Conservation Area will be maintained and the proposed development will therefore be of no risk of affecting the heritage significance of Charlcombe Conservation Area

Registered Parks and Gardens

3.17 There is one Registered Park and Garden (RPG) within 1km of the Site, Lansdown Cemetery and Beckford’s Tower. Visibility of the site from this RPG is contained by the boundary wall and vegetation. Development may be visible from the cemetery gates, although this could be partly limited by vegetation. The current view from the gates looks across the road towards the sports pavilion and tennis courts. Development at Ensleigh would also be behind the redeveloped MOD site. Development of the Ensleigh site should not affect its heritage significance as a good example of an early Victorian garden cemetery or the setting it provides to Beckford’s Tower, and would therefore be of low risk to the heritage significance of the cemetery.

World Heritage Site

3.18 The B&NES study concludes that the proposed development would have an impact of low-medium significance on the World Heritage Site.

Summary of Combined Risk to Heritage Assets

3.19 Table 3.1 and Figure 3.1 summarises the combined risk to the significance of known heritage assets within the Ensleigh site.
Table 3.1: Ensleigh, Summary Table of Risk to the Significance of the Heritage Asset

<table>
<thead>
<tr>
<th>Field</th>
<th>Arch.</th>
<th>Historic B'dings</th>
<th>CA</th>
<th>RPG</th>
<th>WHS</th>
<th>Overall judgement of risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sports field</td>
<td></td>
<td>Low/medium</td>
<td></td>
<td></td>
<td></td>
<td>Low</td>
</tr>
</tbody>
</table>

Ensleigh Summary Map

- **High risk to significance of heritage assets**
- **Medium risk to significance of heritage assets**
- **Low risk to significance of heritage assets**

Risk relating to undiscovered archaeology has not been mapped. It is recommended that a detailed survey be carried out prior to development.

NTS @ A4

Figure 3.1: Ensleigh, Summary of Risk to the Significance of the Heritage Asset
3.20 In summary, development at the Ensleigh site will be of low risk to the significance of known heritage assets, although great care will need to be taken to ensure development does not impinge on the setting of the WHS. Development on the site is however considered to present a medium risk in relation to unknown archaeological assets and therefore appropriate mitigation would be required (as outlined below).

Mitigation and Enhancement

3.21 Please note that mitigation and enhancement measures are only provided in relation to areas which have been identified as low or medium risk. As outlined in the NPPF and Table 2.2 of this report, development in areas of high risk should be exceptional or wholly exception and therefore avoided as there is a risk that development could cause substantial harm to the designated heritage assets, or non-designated heritage assets of demonstrably equivalent significance, and/or their settings.

3.22 If the site is allocated for development, it is important that opportunities are taken to avoid or minimise impacts on heritage assets and their settings. These include the following:

- Retain and strengthen the existing tree screening surrounding the site, plant new screening along unplanted boundaries to help soften the development, particularly along the southern boundary of the site.
- Utilise new tree planting as a framework throughout the proposed development, with sufficient set back to allow growth of trees which will eventually break up the rooflines of development in views from Beckford’s Tower. Limit development to two storeys towards the northern half of the site to reduce the visual impact when seen in views from the tower. This is due to existing tree cover providing screening to the west of the site.
- Limit light column heights to that of the development to minimise vertical features within the view from Beckford’s Tower.

3.23 Whilst there are no known heritage assets on the site, there remains the potential for impact on presently-unknown archaeological remains. It would be necessary to carry out an archaeological evaluation to establish whether such remains are present, and identify their date, nature and significance before a decision could be made on whether mitigation measures of the type described in Appendix 7 are appropriate.

Site 2: Weston

3.24 The following provides a summary of the study findings in relation to Weston. Please refer to Appendix 2 for the full detailed assessment.

Site Location and Context

3.25 The potential development site at Weston is situated to the northwest of Bath city centre to the northern edge of the suburb of Weston. The site comprises a number of agricultural fields set across an undulating southwest-facing valley side between roughly 100m AOD and 160m AOD. The Core Strategy consultation document identifies the site for residential-led mixed use development of around 300 dwellings in the plan period.

3.26 To the north and west, the surrounding area mainly comprises agricultural fields, with pockets of woodland and small clusters of farm and residential buildings. To the north there is an area of Open Access land and a community woodland. To the southeast and southwest, the site borders the residential area of Weston.

3.27 Lansdown cemetery and Beckford’s Tower, a Grade I listed structure and local landmark is situated at the top of the hillside to the northeast of the site.

Summary of Risk to Heritage Assets

Archaeology

3.28 The only known assets within the site recorded on the HER are Roman pottery, glass and rubble stone, perhaps indicative of walling, between Upper Weston Farm and Chelscombe Farm, thought
to indicate an occupation site of probably regional significance, and a post-medieval farm (Rohannon Farm) of low significance. The development is likely to cause a significant direct impact, and thus presents a high risk to the heritage significance of Roman assets. Additionally, this study has identified possible medieval strip lynchets, ridge and furrow, and field systems within the site itself. They would probably be of only low to medium sensitivity if confirmed as such, but direct impact on them would be severe and would therefore result in medium risk to heritage significance (nevertheless further work will be required to assess their true extent and condition). No issues have been identified in relation to the setting of the (presumed) Roman occupation site. Archaeologically, the setting of the medieval strip lynchets would originally have been within open cultivated fields, rather than the present enclosed pasture.

3.29 Prehistoric and Roman activity is well recorded within the 1km zone around the site. Evidence includes Mesolithic/Neolithic scatters of worked flint on Lansdown Hill and Kelston Round Hill, several Bronze Age barrows north and north-east of the site on Lansdown Hill, and Iron Age settlement to the east. Roman evidence from the study area includes roads to the south west and north east of the site, possible farmsteads/occupation near Sion Hill and between Weston Church and the site, a cemetery and finds of artefacts.

3.30 The late Anglo-Saxon / medieval village of Weston is to the south of the site. Medieval strip lynchets are recorded in the study area. Neither of these would be directly affected by development on the site.

3.31 The study area as a whole, including the site, is considered to have moderate potential for unknown archaeological remains of the prehistoric and Roman periods within its overall extent. There is, however, no evidence for major settlement or intensive occupation over the entire area. Later prehistoric and Roman occupation is likely to have been in the form of scattered farmsteads, but these can be expected to form localised foci and would typically be surrounded by areas containing remains associated with field systems. The site is considered to present a medium risk of development encountering unknown archaeological occupation and activity sites, indicated by the presence of flint artefacts and medieval field remains on the site, and later prehistoric and Roman occupation sites in the vicinity.

3.32 In the absence of further investigation the possible presence of unknown buried archaeological remains of high sensitivity cannot be discounted, and any assessment of risk made here can only be provisional.

Historic Buildings

3.33 There are 280 listed buildings within 1km of the site. This is in part due to the location of the site partly within the Bath Conservation Area and World Heritage Site. Key sites considered in detail in the assessment included Beckford’s Tower and associated structures, Prospect Place and Historic Farmsteads.

3.34 The proposed site lies to the south west of Beckford’s Tower, and would be visible in views from the top of it and limited parts of the site would also be visible from the base of the tower. The main views from the tower are to the south west, development of the areas of the site visible from the tower therefore has the potential to influence these views, this relates to fields O to S particularly. Development of the upper fields would therefore present a high risk to the heritage significance of Beckford’s Tower.

3.35 The Weston site is characterised by open farmland punctuated by a series three Grade II historic farmsteads (Weston Farmhouse, Barn at Heather Farm and Chelscombe Farm). These farmsteads would benefit from an undeveloped buffer to maintain their setting. However, development of the fields below the farmsteads would present a low risk to the heritage significance of the farmsteads. Development of the field in which Upper Weston Farm is situated, field K, would pose a medium risk to the significance of Upper Weston Farm.

3.36 Prospect Place are two Grade II listed terraces which currently look towards an open field and field T is therefore of high sensitivity. However, the terrace is already situated on the edge of a built up area. Development of field T would pose a medium risk to the heritage significance of Prospect Place.
Conservation Areas

3.37 Part of the site falls within the Bath Conservation Area. The Charlcombe Conservation Area is also located within 1km of the site. The setting of the Bath Conservation Area is likely to be affected due to the site being situated within the Conservation Area and the contribution made to this by the green hillside slopes. Fields located to the west of the site (fields A-F) are likely to pose a lower risk to the Conservation Area’s setting whereas the fields situated on the higher slopes further east in the site would pose a high risk to the setting of the conservation area (fields H, I, J, K, O, Q, P, V and X). The lower fields in this site (fields G, L, M, N, R, S, T, U and W) would pose a medium risk.

3.38 The Charlcombe Conservation Area is situated to the northeast and does not lie within the zone of theoretical visibility for the development and will therefore not be affected by the development.

Registered Parks and Gardens

3.39 There are two Registered Parks and Gardens within 1km of the site, Lansdown Cemetery and Beckford’s Tower and Royal Victoria Park while Kelston Park registered Grade II* with its associations with Capability Brown is located 1.3km to the south west of the potential development site. Visibility of the part of the site, namely field S within the valley below the cemetery, is afforded over the boundary wall of Lansdown Cemetery from some locations within the cemetery. However, development of the site would not affect the layout of the cemetery, nor the relationship of the cemetery with Beckford’s Tower.

3.40 Development of the Weston site, therefore, would not affect its heritage significance as a good example of an early Victorian garden cemetery or the setting it provides to Beckford’s Tower, and would therefore be of low risk to the heritage significance of the cemetery.

3.41 The heritage significance of Victoria Park is unlikely to be at risk from development due to intervening built development and vegetation. The ZTVs for the site indicate limited theoretical visibility from the north western corner of the Park around the Great Dell, to the site. In reality actual visibility is prevented by intervening buildings and vegetation. There would therefore be a low risk to the heritage significance of Victoria Park.

3.42 Views from Kelston Park RPG would need to be taken into consideration. From higher areas within the RPG such as around Kelston Park house, there is potential for development on the higher slopes of the more easterly fields (Fields T, U, V, X and Y) to be visible. There is also potential for development on the higher slopes of the more westerly fields (Fields C-E) to be visible although this requires further more detailed investigation. The central and lower areas of the Weston site are likely to be screened by the ridge line formed by Kelston Round Hill and Dean Hill. There is therefore potential for development of the fields in which development would be visible to present a medium risk to the heritage significance of this registered park and garden.

World Heritage Site

3.43 The potential development site is situated within and across the WHS boundary. The B&NES WHS LVIA study concludes that the significance of the impact on the WHS will vary between the various fields within the site as follows:

- Development on fields A, G west, L and T south will have an impact of low negative significance on the WHS.
- Development on fields F East, G Valley, M West, U South and W South will have an impact of medium negative significance on the WHS.
- Development on fields F West, M Centre and East, N, Q, R, S, T north and U will have an impact of high negative significance on the WHS.

3.44 There are a number of fields not considered in the B&NES study; however it is likely that they would pose a risk to the setting of the WHS due to being located further up the valley side. These fields are B, C, D, E, H, I, J, K, O, P, V, X, Y and the top half of field W.

3.45 Development of these upper fields is considered to pose a high risk to the heritage significance of the World Heritage Site, forming part of the WHS Green Hills setting.
Summary of Combined Risk to Heritage Assets

3.46 Table 3.2 and Figure 3.2 summarises the combined risk to the significance of known heritage assets within the Weston site in relation to each identified land parcel/field.
<table>
<thead>
<tr>
<th>Field</th>
<th>Arch.</th>
<th>Historic B’dings</th>
<th>CA</th>
<th>RPG</th>
<th>WHS</th>
<th>Overall judgement of risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>A (A)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Low</td>
</tr>
<tr>
<td>B</td>
<td></td>
<td></td>
<td></td>
<td>High*</td>
<td></td>
<td>High due to the effect on the WHS</td>
</tr>
<tr>
<td>C</td>
<td></td>
<td>Setting of Kelston Park</td>
<td>High*</td>
<td></td>
<td></td>
<td>High due to the effect on the WHS</td>
</tr>
<tr>
<td>D</td>
<td></td>
<td>Setting of Kelston Park</td>
<td>High*</td>
<td></td>
<td></td>
<td>High due to the effect on the WHS</td>
</tr>
<tr>
<td>E</td>
<td></td>
<td>Setting of Kelston Park</td>
<td>High*</td>
<td></td>
<td></td>
<td>High due to the effect on the WHS</td>
</tr>
<tr>
<td>F (C)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Medium due to the effect on the WHS</td>
</tr>
<tr>
<td>G (D)</td>
<td></td>
<td>Setting of Bath CA</td>
<td></td>
<td>West: Low</td>
<td></td>
<td>Low, effects on the Bath CA could potentially be mitigated through design</td>
</tr>
<tr>
<td>H*</td>
<td></td>
<td>Setting of Bath CA</td>
<td></td>
<td>High*</td>
<td></td>
<td>High due to the effect on the WHS</td>
</tr>
<tr>
<td>I*</td>
<td></td>
<td>Setting of Bath CA</td>
<td></td>
<td>High*</td>
<td></td>
<td>High due to the effect on the WHS</td>
</tr>
<tr>
<td>J*</td>
<td></td>
<td>Setting of Bath CA</td>
<td></td>
<td>High*</td>
<td></td>
<td>High due to the effect on the WHS</td>
</tr>
<tr>
<td>K*</td>
<td></td>
<td>Setting of Upper Weston Farm</td>
<td>High*</td>
<td></td>
<td></td>
<td>High due to the effect on the WHS</td>
</tr>
<tr>
<td>L (E)</td>
<td></td>
<td>Setting of Bath CA</td>
<td></td>
<td></td>
<td>Low</td>
<td>Low, effects on the Bath CA could be potentially mitigated through design</td>
</tr>
<tr>
<td>M</td>
<td>Possible Lynchets*</td>
<td>Setting of Bath CA</td>
<td>(F west)</td>
<td></td>
<td></td>
<td>Medium, the extent of the Lynchets will need to be surveyed further</td>
</tr>
<tr>
<td>Field</td>
<td>Arch.</td>
<td>Historic B’dings</td>
<td>CA</td>
<td>RPG</td>
<td>WHS</td>
<td>Overall judgement of risk</td>
</tr>
<tr>
<td>-------</td>
<td>-------</td>
<td>------------------</td>
<td>----</td>
<td>-----</td>
<td>-----</td>
<td>--------------------------</td>
</tr>
<tr>
<td>N (G)</td>
<td>Possible Lynchets*</td>
<td>Setting of Bath CA</td>
<td>Setting of Bath CA</td>
<td>High*</td>
<td>High due to the effect on the WHS</td>
<td></td>
</tr>
<tr>
<td>O*</td>
<td>Roman Remains</td>
<td>Setting of Beckford’s Tower</td>
<td>Setting of Bath CA</td>
<td>High*</td>
<td>High due to the effect on the WHS</td>
<td></td>
</tr>
<tr>
<td>P*</td>
<td>Setting of Beckford’s Tower</td>
<td>Setting of Bath CA</td>
<td>High*</td>
<td>High due to the effect on the WHS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q (H)</td>
<td>Setting of Beckford’s Tower</td>
<td>Setting of Bath CA</td>
<td>High</td>
<td>High due to the effect on the WHS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>R (I)</td>
<td>Setting of Beckford’s Tower and setting of Weston Farm</td>
<td>Setting of Bath CA</td>
<td>High</td>
<td>High due to the effect on the WHS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>S (J)</td>
<td>Beckford’s Tower</td>
<td>Setting of Bath CA</td>
<td>Setting of Lansdown Cemetery</td>
<td>High</td>
<td>High due to the effect on the WHS</td>
<td></td>
</tr>
<tr>
<td>T (K1 lower) (K2 upper)</td>
<td>Lynchets on upper slopes*</td>
<td>Setting of Prospect Place</td>
<td>Setting of Bath CA</td>
<td>Upper part of field: High</td>
<td>High due to the effect on the WHS</td>
<td></td>
</tr>
<tr>
<td>U (Upper L1 Lower, L1 south)</td>
<td>Possible Lynchets*</td>
<td>Setting of Bath CA</td>
<td>Setting of Kelston Park</td>
<td>Upper part: High</td>
<td>High due to the effect on the WHS</td>
<td></td>
</tr>
<tr>
<td>V*</td>
<td>Possible Lynchets*</td>
<td>Setting of Bath CA</td>
<td>Setting of Kelston Park</td>
<td>High*</td>
<td>High due to the effect on the WHS</td>
<td></td>
</tr>
<tr>
<td>Field</td>
<td>Arch.</td>
<td>Historic B’dings</td>
<td>CA</td>
<td>RPG</td>
<td>WHS</td>
<td>Overall judgement of risk</td>
</tr>
<tr>
<td>---------</td>
<td>-------</td>
<td>------------------</td>
<td>------------------</td>
<td>----------</td>
<td>---------</td>
<td>--------------------------</td>
</tr>
<tr>
<td>W</td>
<td></td>
<td></td>
<td>Setting of Bath CA</td>
<td>High*</td>
<td></td>
<td>High due to the effect on the WHS</td>
</tr>
<tr>
<td>(North*)</td>
<td></td>
<td></td>
<td>Setting of Bath CA</td>
<td>Medium</td>
<td></td>
<td>Medium due to the effect in the WHS</td>
</tr>
<tr>
<td>(South L2)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>X*</td>
<td></td>
<td>Possible Lynchets*</td>
<td>Setting of Bath CA</td>
<td>High*</td>
<td></td>
<td>High due to the effect on the WHS</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Setting of Kelston Park</td>
<td>High*</td>
<td></td>
<td>High due to the effect on the WHS</td>
</tr>
<tr>
<td>Y*</td>
<td></td>
<td></td>
<td>Setting of Bath CA</td>
<td>High*</td>
<td></td>
<td>High due to the effect on the WHS</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Setting of Kelston Park</td>
<td>High*</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* 'Possible Lynchets' - This assessment is based on evidence from air photographs and further ground survey would be needed to identify their presence, condition and extent. If well preserved this could alter the assessments for Fields M and U, with the total field area in each case assessed as 'High Risk to the significance of heritage assets'.

Bath and North East Somerset Heritage Asset Study 20 August 2013
Figure 3.2: Weston - Summary of Risk to the Significance of the Heritage Asset

Weston Summary Map

- **High risk to significance of heritage assets**
- **Medium risk to significance of heritage assets**
- **Low risk to significance of heritage assets**

Risk relating to undiscovered archaeology has not been mapped. It is recommended that a detailed survey be carried out prior to development.

NTS ® A4

* Field not included in B&NES LVIA study

* High risk to known archaeological heritage assets, indicative location

Please note the assessment area cell labels A-Y do not correspond directly to the other studies that have been produced by B&NES, compare cells with care.
In summary, development at the Weston site will be:

- **low risk** within fields A, West G, and L
- **medium risk** within fields East F, G, West M, South T, South U and South W
- **high risk** within the remaining fields.

Development on the site is however considered to present a **medium risk** in relation to unknown archaeological assets and therefore appropriate mitigation would be required (as outlined below).

### Mitigation and Enhancement

3.49 Please note that mitigation and enhancement measures are only provided in relation to areas which have been identified as low or medium risk. As outlined in the NPPF and Table 2.2 of this report, development in areas of high risk should be exceptional or wholly exception and therefore avoided as there is a risk that development could cause substantial harm to the designated heritage assets, or non-designated heritage assets of demonstrably equivalent significance, and/or their settings.

3.50 If areas of low to moderate risk are allocated for development, it is important that opportunities are taken to avoid or minimise impacts on heritage assets and their settings. These include the following:

- Retain and strengthen existing hedgerow and trees, with new screening along unplanted boundaries to help soften the development.
- Use new tree planting as a framework throughout the proposed development, with sufficient set back to allow growth of trees which will eventually break up the rooflines of development in views from across the valley.
- Limit development to two storeys in the higher fields to reduce the visual impact when seen in views from the tower.
- The suggested Roman site is indicated by the presence of artefacts, but its true extent and character is uncertain although it is considered probably to be of no more than medium sensitivity. One or more of the general mitigation measures outlined in Appendix 7 is likely to be appropriate, but an archaeological evaluation would be necessary to establish its nature before a decision could be made.
- Any impact on the 19th century farm, which archaeologically is considered to be of low sensitivity, could be mitigated by appropriate recording.

As outlined in Figure 3.2, there is the potential for high quality design to be used to mitigate effects on the Bath Conservation Area and Prospect Place.

3.52 There is a potential risk to presently-unknown archaeological remains within the study site. It would be necessary to carry out an archaeological evaluation to establish whether such remains are present, and identify their date, nature and significance before a decision could be made on whether mitigation measures of the type described in Appendix 7 are appropriate.

### Site 3: Odd Down

3.53 The following provides a summary of the study findings in relation to Odd Down. Please refer to Appendix 3 for the full detailed assessment.

#### Site Location and Context

3.54 This greenfield site is situated on the plateau to the south of the city of Bath. The site is to the south of the settlement boundary at Odd Down. Part of the site (Sulis Manor and garden) is within the World Heritage Site boundary, and the rest is adjacent to it. The proposed development site consists of ten fields, four to the west of Sulis Manor and gardens, and a further six to the east. There are a number of large agricultural buildings in the most south easterly of these fields. Sulis Manor and gardens are also included within the development area.
The Core Strategy consultation document identifies the site for residential-led mixed use development of around 300 dwellings in the plan period. The site is situated across a broadly level plateau, lying at 165-175m above sea level with a slight fall from south towards the north east. The topography of the area slopes down steeply beyond the southern boundary of the site. Field boundaries are marked by dry stone walls and boundary trees.

Adjacent to the north is the suburb of Odd Down. The South Stoke Conservation Area is situated to the south east, open pasture and woodland of the Cam Valley to the south, and Odd Down Park and Ride to the west. The Wansdyke Scheduled Ancient Monument runs east to west along the northern boundary of the site along the rear of properties which create the existing settlement edge.

Summary of Risk to Heritage Assets

Archaeology

The B&NES Historic Environment Record includes three assets within the site. Part of the northern boundary is formed by a section of the West Wansdyke, an Anglo-Saxon linear earthwork which is a Scheduled Monument of national significance. Prehistoric worked flints have been found, indicating activity and possibly the presence of an occupation site. A 1930s house and garden, Sulis Manor, is recorded, but is not considered archaeologically significant and the risk to the heritage significance of Sulis Manor is considered to be low.

Within the study area prehistoric and Roman occupation has been found in archaeological excavations immediately to the south of the site, and there is considerable evidence for occupation in these periods elsewhere in the area. The occupation evidence is likely to be of regional importance, indicating the distribution of settlement as well as its nature.

There is no evidence for significant medieval or post-medieval occupation within the site. In the study area there is evidence of a deserted farmstead at Hoggen Coppice to the north-west, and in the present village of South Stoke to the south-east.

The setting of the Wansdyke has been compromised by residential development to the north of the monument (Odd Down), the garden boundaries of which encroach on to it, and a smaller area of development on its southern side (Sulis Meadows estate), to the north-west of the assessment site, which have destroyed its original open aspect at these locations. However, within the assessment site the open setting to the south survives (towards South Stoke), and the aspect both to and from the monument can still be appreciated in that direction, although interrupted by modern hedge and tree-lines which restrict the more distant aspects. Archaeologically, the open aspect is an important element of the setting, illustrating the monument’s position and function as a boundary marker in what was probably a relatively sparsely-settled area. There is a high risk to the heritage significance of the Wansdyke. Apart from the Wansdyke, no archaeological issues have been identified in relation to impacts on other known archaeological assets in the site or study area.

The site is considered to have high potential for unknown archaeological remains of the later prehistoric and Roman periods within its overall extent. There is, however, no evidence for major settlement or intensive occupation over the entire area. Occupation is likely to have been in the form of scattered farmsteads, but these can be expected to form localised foci and would typically be surrounded by areas containing remains associated with field systems. Over the site there is a medium risk of the development encountering unknown archaeological occupation and activity sites, indicated by the known presence of flint artefacts on the site, and later prehistoric and Roman occupation sites in the immediate vicinity.

In the absence of further investigation the possible presence of unknown buried archaeological remains of high sensitivity cannot be discounted, and any assessment of risk made here can only be provisional.

Historic Buildings

There are no listed buildings on the site, but there are 64 listed buildings within 1km of the site. The assessment considered the potential impact on one key listed building - the Grade II listed Cross Keys Public House. There would be limited visibility of the site and so the development presents a low risk to the heritage significance of the pub. The building is traditionally
associated with the road junction, but it is important that it should not be overwhelmed by modern highway development.

Conservation Areas

3.64 There are two Conservation Areas within 1km of the site South Stoke and Bath Conservation Areas. The setting of South Stoke Conservation Area as small hillside settlement overlooking the Cam valley will not be affected by the development at Odd Down. Development of the site therefore presents an overall low risk to the significance of the Conservation Area.

3.65 The setting of Bath Conservation Area will also not be affected by development providing it does not break the skyline in views looking south.

Registered Parks and Gardens

3.66 There are no Registered Parks and Gardens within 1km of the site but there are two locally designated gardens. There would be a low risk to the heritage significance of the locally designated park and garden at Midford Castle which is at some distance from the site.

3.67 Developing the fields either side of Sulis Manor gardens which is also locally designated would result in a low risk to the heritage significance of the Manor garden due to the enclosure to the garden afforded by the tree cover. Developing the garden itself would result in a medium risk to the heritage significance.

World Heritage Site

3.68 B&NES Council carried out an LVIA study in relation to the World Heritage Site. This concludes that the significance of the impact on the WHS will vary between the various fields within the site as follows:

- Development on the sports field and Field East 1 will have an impact of low negative significance on the WHS.
- Development on fields West 1 north and East 4 north will have an impact of medium negative significance on the WHS.
- Development on fields West 2, West 1 south, East 4 south, East 3 and East 2 will have an impact of high negative significance on the WHS.

3.69 There are some parts of fields not considered in the WHS LVIA study, potentially because these areas have been planted with shelter belt trees and there are existing agricultural buildings. These are the most southern parts of West 1 south, East 4 south, East 3 and the eastern edge of East 2. The shelter belts provide an important screen to the site in views from the south and potential views from the South Stoke Conservation Area.

Summary of Combined Risk to Heritage Assets

3.70 Table 3.3 and Figure 3.3 summarise the combined risk to the significance of known heritage assets within the Odd Down site in relation to each identified land parcel/field.

Table 3.3: Odd Down, Summary Table of Risk to the Significance of the Heritage Asset

<table>
<thead>
<tr>
<th>Field</th>
<th>Arch.</th>
<th>Historic B’dings</th>
<th>CA</th>
<th>RPG</th>
<th>WHS</th>
<th>Overall judgement of risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sports field</td>
<td></td>
<td></td>
<td></td>
<td>Low</td>
<td></td>
<td>Low</td>
</tr>
<tr>
<td>West 1 north</td>
<td></td>
<td></td>
<td></td>
<td>Medium</td>
<td></td>
<td>Medium due to the effect on the WHS</td>
</tr>
<tr>
<td>West 1 south</td>
<td></td>
<td></td>
<td></td>
<td>High</td>
<td></td>
<td>High due to the effect on the WHS</td>
</tr>
<tr>
<td>West 2</td>
<td></td>
<td></td>
<td></td>
<td>High</td>
<td></td>
<td>High due to the effect on the WHS</td>
</tr>
<tr>
<td>Sulis Manor</td>
<td>Sulis Manor and garden</td>
<td></td>
<td></td>
<td>Medium</td>
<td></td>
<td>Medium due to the effect on the WHS</td>
</tr>
<tr>
<td>East 1</td>
<td>Setting of the Wansdyke</td>
<td></td>
<td></td>
<td>Low to Medium</td>
<td></td>
<td>High due to the effect on the setting of the Wansdyke,</td>
</tr>
<tr>
<td>Field</td>
<td>Arch.</td>
<td>Historic B’dings</td>
<td>CA</td>
<td>RPG</td>
<td>WHS</td>
<td>Overall judgement of risk</td>
</tr>
<tr>
<td>---------</td>
<td>----------------------</td>
<td>------------------------------</td>
<td>------------</td>
<td>-----</td>
<td>-----</td>
<td>-----------------------------------------------</td>
</tr>
<tr>
<td>East 2</td>
<td>Setting of the Wansdyke</td>
<td>Cross Keys Public House</td>
<td>High</td>
<td></td>
<td></td>
<td>High due to the effect on the WHS</td>
</tr>
<tr>
<td>East 3</td>
<td></td>
<td>South Stoke Conservation Area</td>
<td>High</td>
<td></td>
<td></td>
<td>High due to the effect on the WHS</td>
</tr>
<tr>
<td>East 4</td>
<td>north</td>
<td>South Stoke Conservation Area</td>
<td>Medium</td>
<td></td>
<td></td>
<td>Medium due to the effect on the WHS</td>
</tr>
<tr>
<td>East 4</td>
<td>south</td>
<td>South Stoke Conservation Area</td>
<td>High</td>
<td></td>
<td></td>
<td>High due to the effect on the WHS</td>
</tr>
</tbody>
</table>
3.71 In summary, development at the Odd Down site will be:

- **low risk** to the significance of known heritage assets within the sports field
- **medium risk** within West 1 north, Sullis Manor and East 4 north
high risk within the remaining fields.

3.72 Development on the site is however considered to present a medium risk in relation to unknown archaeological assets and therefore appropriate mitigation would be required (as outlined below).

Mitigation and Enhancement

3.73 Please note that mitigation and enhancement measures are only provided in relation to areas which have been identified as low or medium risk. As outlined in the NPPF and Table 2.2 of this report, development in areas of high risk should be exceptional or wholly exception and therefore avoided as there is a risk that development could cause substantial harm to the designated heritage assets, or non-designated heritage assets of demonstrably equivalent significance, and/or their settings.

3.74 If areas of low to moderate risk are allocated for development, it is important that opportunities are taken to avoid or minimise impacts on heritage assets and their settings. These include the following:

- Reduce risks to developing Sulis Manor and garden by sensitive design of very low density, retaining the framework of trees on site.
- Reduce risks to the South Conservation Area by limiting the height of the development.
- Utilise tree planting as a framework throughout the proposed development, with sufficient set back to allow growth of trees which will eventually break up the rooflines of development.
- Limit lighting column heights to that of the development to minimise vertical features within the view from the Wansdyke.

3.75 There is a risk to presently-unknown archaeological remains within the study site. It would be necessary to carry out an archaeological evaluation to establish whether such remains are present, and identify their date, nature and significance before a decision could be made on whether mitigation measures of the type described in Appendix 7 are appropriate.

Site 4: South West Keynsham

3.76 The following provides a summary of the study findings in relation to South West Keynsham. Please refer to Appendix 4 for the full detailed assessment.

Site Location and Context

3.77 The South West Keynsham site is situated around 1.7km south of Keynsham town centre to the east of the village of Queen Charlton. The site comprises a series of 14 fields set across a gently sloping plateau to the west of the Chew Valley. The boundary includes a small cluster of residential properties along Parkhouse Lane. The Core Strategy consultation document identifies the site for residential-led mixed use development of around 200 dwellings in the plan period. The site is to the south of the K2B development site, also identified (and granted permission) for residential-led mixed use development.

3.78 The site is predominantly surrounded by farmland; to the north is Abbots Wood, a planted community woodland along with the K2B development site. To the east the land slopes steeply down to the Chew Valley which contains the small settlements of Chewton Place and Chewton Keynsham.

Summary of Risk to Heritage Assets

Archaeology

3.79 There are no recorded archaeological assets within the site (although the B&NES Historic Environment Record includes one which is incorrectly located). Air photographs suggest buried remains of medieval field systems, mainly ridge and furrow, are present. There is considered to be a low risk to known archaeological assets.

3.80 Within the study area there is some, though limited, evidence for prehistoric occupation. Flint artefacts and field systems have been recorded, and possible prehistoric settlement features are
suggested by geophysical survey immediately north of the site. Roman occupation including two
villas and an extensive area of settlement is known from elsewhere around Keynsham, but the
only evidence from the study area is a few chance finds and a small quantity of pottery. Adjacent
to the northern boundary is Parkhouse Farm, elements of which are reputed to date from the 16th
century.

3.81 No archaeological issues have been identified in relation to the setting of known archaeological
assets in the site or study area.

3.82 The site is considered to have generally moderate potential for unknown archaeological remains of
the prehistoric period within its overall extent, with higher potential in the north adjacent to the
settlement evidence suggested by geophysical survey on Charlton Road. There is considered to be
low to moderate potential for unknown Roman remains. However, there is no evidence for major
settlement or intensive occupation over the entire area. In both periods, occupation is likely to
have been in the form of scattered farmsteads, but these can be expected to form localised foci
and would typically be surrounded by areas containing remains associated with field systems.
There is only low potential for later periods. The overall risk of development encountering
unknown remains over the remainder of the site is considered to be medium, with a
localised higher risk at the north, although it is unlikely that the distribution of unknown
remains will be uniform across the site.

3.83 In the absence of further investigation the possible presence of unknown buried archaeological
remains of high sensitivity cannot be discounted, and any assessment of risk made here can only
be provisional.

Historic Buildings

3.84 There are 35 listed buildings within 1km of the site. Two Grade II listed buildings were considered
in detail in the assessment, Parkhouse Farm and Chewton Place. There is potential for
development in the far east of the site to break the skyline and therefore begin to affect the
setting of Chewton Place and the associated listed buildings there. Development of the far
east of the site would pose a medium risk to the heritage significance of Chewton Place.

3.85 The development site is beyond the immediate setting of Parkhouse Farm and the reverse ZTV
indicates limited visibility of the site from the location of the building. There is likely to be
visibility of the development from upper floors of the farmhouse. However, development of the
site would pose a low risk to the heritage significance of this listed building.

Conservation Areas

3.86 There are three Conservation Areas within 1km of the proposed site, Queen Charlton and
Keynsham Dapps Hill and Keynsham High Street Conservation Area

3.87 Views from the southern part of Keynsham Dapps Hill Conservation Area have the potential
to be affected should the most easterly edges of the site be developed without sufficient set back.
However this is the edge of the Conservation Area only. Development of the far eastern edges
would pose a medium risk to the heritage significance of this Conservation Area.
Keynsham High Street Conservation Area is contiguous with Keynsham Dapps Hill to the
south. The ZTVs indicate no visibility from this Conservation Area and it is therefore not
considered further.

3.88 The ZTVs indicate limited visibility of the potential development from the most easterly part of
Queen Charlton Conservation Area. The western part of the site is separated from the Queen
Charlton Conservation Area by a low ridge and a stand of trees and the intervening tree cover will
limit visibility of development. It may however be important to limit the height and extent of
development within the west of the site and ensure that it does not break the skyline in views
from the west. Overall, the development may pose a medium risk to the heritage significance
of this Conservation Area.

Registered Parks and Gardens

3.89 There are no registered parks and gardens within 1km of the site
**World Heritage Site**

3.90 This site lies outside the zone of theoretical visibility for the WHS and this is therefore not considered further.

**Summary of Combined Risk to Heritage Assets**

3.91 **Table 3.4** and **Figure 3.4** summarise the combined risk to the significance of known heritage assets within the SW Keynsham site in relation to each identified land parcel/field.

**Table 3.4: South West Keynsham, Summary Table of Risk to the Significance of the Heritage Asset**

<table>
<thead>
<tr>
<th>Areas</th>
<th>Arch.</th>
<th>Historic B’dings</th>
<th>CA</th>
<th>RPG</th>
<th>Overall judgement of risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>Western edges</td>
<td></td>
<td></td>
<td>There is potential for the setting of the Queen Charlton Conservation Area to be affected should the stand of trees between the site and the CA be felled. It would be important to ensure that development did not break the skyline.</td>
<td>Medium due to the potential effects on the Queen Charlton CA. This could potentially be mitigated by limiting development height and the stand of trees remaining.</td>
<td></td>
</tr>
<tr>
<td>Central fields</td>
<td></td>
<td></td>
<td>Low</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Eastern edges</td>
<td></td>
<td></td>
<td>Potential for the setting of assets of Chewton Place to be affected should development break the skyline of Chew Valley.</td>
<td>There is potential for the setting of the edge of the Keynsham Dapps Hill Conservation Area to be affected.</td>
<td>Medium due to the potential effects on the CA and historic buildings at Chewton Place. This could potentially be mitigated by limiting development height in the east of the site.</td>
</tr>
</tbody>
</table>
South West Keynsham Summary Map

- High risk to significance of heritage assets
- Medium risk to significance of heritage assets
- Low risk to significance of heritage assets

Risk relating to undiscovered archaeology has not been mapped. It is recommended that a detailed survey be carried out prior to development.

NTS @ A4

Figure 3.4: SW Keynsham - Summary of Risk to the Significance of the Heritage Asset

Labels A, B and C refer to other B&NES studies, in this case the Greenbelt Review, and do not accord with the site boundaries of this report. They are included on the map figure to allow cross reference.
In summary, development at the SW Keynsham site will be:

- **low risk** to the significance of known heritage assets within the central fields.
- **medium risk** within the western and eastern edges.

There are no areas identified at high risk.

Development on the site is however considered to present a **medium risk** in relation to unknown archaeological assets and therefore appropriate mitigation would be required (as outlined below).

**Mitigation and Enhancement**

Please note that mitigation and enhancement measures are only provided in relation to areas which have been identified as low or medium risk. As outlined in the NPPF and Table 2.2 of this report, development in areas of high risk should be exceptional or wholly exception and therefore avoided as there is a risk that development could cause substantial harm to the designated heritage assets, or non-designated heritage assets of demonstrably equivalent significance, and/or their settings.

If areas of low to moderate risk are allocated for development, it is important that opportunities are taken to avoid or minimise impacts on heritage assets and their settings. These include the following:

- Limit development height and density in the most westerly fields in order to avoid the potential for effect on the Queen Charlton Conservation Area should the stand of trees to the west of the site be felled. On site visits (14/8/13 and 21/8/13) this stand of trees appeared to be monoculture, potentially being grown for timber.

- Limit development height and density in the most easterly part of the site in order to avoid the development breaking the skyline in views from Chewton Place.

- Limit development height in the most easterly part of the site and provide sufficient tree planting within the development to reduce visibility in views from the Keynsham Dapps Hill Conservation Area.

- Retain and strengthen the existing tree screening surrounding the site, with new screening along internal field boundaries to help soften development, particularly within the eastern and western quartiles.

- Utilise new tree planting as a framework throughout the proposed development, with sufficient set back to allow growth of trees which will eventually break up the rooflines of development.

- Limit development to two storeys at the western and eastern edges in order to reduce the possibility of development breaking the skyline to the west and impinging on the Chew Valley to the east.

- Limit lighting heights to that of the development to minimise vertical features within the view.

The only known archaeological asset on the site is the possible buried remains of medieval agriculture, mainly ridge and furrow. Until its nature is confirmed, it should be considered as for unknown remains (below), although of only low sensitivity and risk.

There is a potential risk to presently-unknown archaeological remains within the site. Would be necessary to carry out an archaeological evaluation to establish whether such remains are present, and identify their date, nature and significance before a decision could be made on whether mitigation measures of the type described in **Appendix 7** are appropriate.

**Site 5: Whitchurch**

The following provides a summary of the study findings in relation to Whitchurch. Please refer to **Appendix 5** for the full detailed assessment.
Site Location and Context
3.100 This greenfield site is situated to the south of the City of Bristol, to the west, south and east of the village of Whitchurch. The site comprises a number of agricultural fields, comprising pasture and areas of recreational land. HorseWorld and the Bristol Barbarians rugby fields are also situated within the site. The Core Strategy consultation document identifies the site for residential-led mixed use development of around 200 dwellings in the plan period.

3.101 To the north and west is Bristol’s existing residential development and to the south and east lie areas of open countryside with small clusters of dwellings along the lanes. The study area is relatively flat and is part of a wide area of land which slopes up gently to the south, away from Bristol. To the southwest is Maes Knoll a prehistoric hilltop fort, and a significant landmark.

Summary of Risk to Heritage Assets
Archaeology
3.102 Within the study site, a Bronze Age settlement has been identified by geophysics and evaluation in a field to the east of Stockwood Lane. The evidence for Roman activity within the study site is extensive and includes three settlements: south of Lyons Court Farm; to the north of Queen Charlton Lane, and a recent geophysical survey and evaluation of land 150m to the north; and to the west of Stockwood Lane. It has been suggested that part of the boundary between the parishes of Whitchurch and Norton Malreward follows the alignment of a Roman road. These are considered to be of local to regional significance. **The known buried prehistoric and Roman remains** are considered to be of medium sensitivity. Development is likely to have a significant direct impact, presenting a high risk to the heritage significance if the site were developed.

3.103 Within the site, Lyons Court Farm is a 15th-century manor house which is Listed Grade II* and retains some original elements. **The standing building at Lyons Court Farm** includes medieval elements that may also have associated unknown remains of high sensitivity, again presenting a high risk to the heritage significance if the site were developed.

3.104 There is a pattern of concentric fields immediately to the south of Whitchurch and around Lyons Court Farm, which is shown on the Tithe map and is likely to be medieval in date. Medieval field boundaries were recorded during an evaluation to the west of Stockwood Lane. Post-medieval assets within the site range from Staunton Manor Farm and Church Farm to the former railway. **There is a high risk to the concentric field pattern** because, although its significance is currently uncertain, it could be of medium sensitivity and development is likely to obliterate or mask it to the extent that its significance is substantially reduced.

3.105 There are two key designated assets within the study area: Maes Knoll Iron Age hillfort, a Scheduled Monument to the south west of the site; and the Anglo-Saxon Wansdyke, a linear bank and ditch which probably functioned as a territorial marker and/or defensive earthwork, two sections of which within the study area are Scheduled. There is no risk of direct impact to Maes Knoll or the Wansdyke, but there is a high risk of impact on its archaeologically significant open setting.

3.106 The study has identified potential for the presence of presently-unknown assets of, particularly, later prehistoric and Roman date within the site. Later prehistoric and Roman occupation is likely to have been in the form of scattered farmsteads of the type already known within the site, but these can be expected to form localised foci and would typically be surrounded by areas containing remains associated with field systems.

3.107 The late medieval Lyons Court Farm may have earlier structural evidence within it, and also buried remains of associated medieval and post-medieval activity. Medieval occupation around centres at St Nicholas Church and Staunton Manor Farm may also be present and extend into the site, but otherwise the potential for medieval remains is low apart from evidence relating to field systems.

3.108 Apart from buried remains associated with agricultural field systems of the type already known from parts of the site, the potential for other medieval and post-medieval remains is low. There is considered to be a medium risk in relation to unknown archaeological remains, the greatest potential being for the later prehistoric and Roman periods.
Existing impacts include modern development in various locations, notably along Staunton Lane, modern ploughing in the arable areas, and localised impacts such as the early 20th century quarrying west of Saltwell Viaduct, landscaping of playing fields etc.

In the absence of further investigation the possible presence of unknown buried archaeological remains of high sensitivity cannot be discounted, and any assessment of risk made here can only be provisional.

**Historic Buildings**

There are two listed buildings within the site and 27 within 1km of the site boundary. To some extent, the village is vulnerable on all sides, but the outlying assets are most at risk of having what is left of the settings compromised. These include farmsteads such as the complex to the west of the church and also the cemetery to the east of the Bristol Road (A37). Key listed buildings considered in the assessment include Lyons Court Farmhouse (Grade II*) (onsite) and St Nicolas Church and Whitewood Farmhouse.

Lyons Court Farmhouse and its associated buildings are still set in a context of open fields, as far as the limited space allows, between Whitchurch and the southern suburbs of Bristol. The reverse ZTV for the site indicates visibility across the southwest and northwest of the site. It is likely that intervening vegetation and the boundary wall would mean that less of the site was visible than shown. Continuing to protect the setting of Lyons Court is a major challenge and **development of the Lyons Court Farm site itself would pose a high risk to the heritage significance of this listed building.**

Whitewood Farm complex is isolated in open countryside that slopes down towards the Whitchurch site. The ZTVs indicate that there would be visibility of the development site from the farm. Development of the site would not incorporate the complex into the built up area, but would reduce the gap between the complex and built development and would pose a **medium risk to the heritage significance of this listed building.**

St Nicholas’ Church is set within its own churchyard adjacent to the open fields of the Whitchurch site, which give it an important rural character. Development of this adjacent field would pose a **high risk to the heritage significance of this listed building.** However, development of the rest of the site would pose a **low risk to the heritage significance of this listed building.**

**Conservation Areas**

The Queen Charlton Conservation Area is situated 900m to the east of the site. Development of the site would not affect the reasons for designation of this Conservation Area, which relate to the possibility that it is a Saxon settlement, and to its high density of listed buildings.

Open countryside to the northwest, including much of the Whitchurch site, forms an important setting for the Conservation Area. Built development is already present in the form of Stockwood and occasional farmsteads. The 3-storey ZTV shows visibility of between 1 and 50% of the Whitchurch Development Site which is reduced to mainly 1-25% when two-storey development is modelled.

The edge of the Conservation Area itself is set back from the small valley between the CA and the site and looks out across intervening fields and boundaries, which include boundary trees.

It is likely that development on the eastern area of the Whitchurch site, between Stockwood and Queen Charlton would pose a **medium risk to the heritage significance of the Conservation Area.** Development of the rest of the site would pose a **low risk to the heritage significance of the Conservation Area.**

**Registered Parks and Gardens**

There are no registered parks and gardens within 1km of the site

**World Heritage Site**

This site lies outside the zone of theoretical visibility for the WHS and this is therefore not considered further.
Summary of Combined Risk to Heritage Assets

3.121 Table 3.5 and Figure 3.5 summarises the combined risk to the significance of known heritage assets within the Whitchurch in relation to each identified land parcel/field.
Table 3.5: Whitchurch, Summary Table of Risk to the Significance of the Heritage Asset

<table>
<thead>
<tr>
<th>Fields</th>
<th>Arch.</th>
<th>Historic B’dings</th>
<th>CA</th>
<th>RPG</th>
<th>Overall judgement of risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>North West</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Low</td>
</tr>
<tr>
<td>South West 1</td>
<td></td>
<td>Setting of St. Nicholas Church</td>
<td></td>
<td></td>
<td>High due to the impacts on the setting of the historic buildings</td>
</tr>
<tr>
<td>South West 2</td>
<td></td>
<td>Setting of Maes Knoll and the Wansdyke</td>
<td>Setting of Lyons Court Farm</td>
<td></td>
<td>Medium due to the setting of the Maes Knoll and presence of concentric field patterns</td>
</tr>
<tr>
<td>South West 3</td>
<td></td>
<td>Setting of Maes Knoll and the Wansdyke</td>
<td>Setting of Whitewood Farm</td>
<td></td>
<td>High due to the potential for effects on the setting of Maes Knoll and the Wansdyke</td>
</tr>
<tr>
<td>North East 1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Low</td>
</tr>
<tr>
<td>North East 2</td>
<td></td>
<td>Setting of Queen Charlton Conservation Area</td>
<td></td>
<td></td>
<td>Medium, careful mitigation required in order to ensure that Queen Charlton Conservation Area is not affected</td>
</tr>
<tr>
<td>South East 1</td>
<td></td>
<td>Setting of Maes Knoll and the Wansdyke</td>
<td></td>
<td></td>
<td>High due to the potential for effects on the setting of Maes Knoll and the Wansdyke</td>
</tr>
<tr>
<td>South East 2</td>
<td></td>
<td>Setting of Maes Knoll and the Wansdyke</td>
<td>Note: Cemetery located within this area</td>
<td></td>
<td>Medium due to the potential for effects on the setting of Maes Knoll and the Wansdyke</td>
</tr>
</tbody>
</table>

In this overall assessment of the risk to the significance of heritage assets, the risk to the concentric field pattern is identified as Medium although further investigation is required to assess its full significance. This may raise the risk to High.

In addition, as identified in Figure 3.5 there is high risk to the significance of heritage assets in a number of spot locations.
Figure 3.5: Whitchurch – Summary of Risk to the Significance of the Heritage Asset

Whitchurch Summary Map

- **Pink**: High risk to significance of heritage assets
- **Orange**: Medium risk to significance of heritage assets
- **Green**: Low risk to significance of heritage assets

High risk to known archaeological heritage assets, indicative location

Risk relating to undiscovered archaeology has not been mapped. It is recommended that a detailed survey be carried out prior to development.

NTS @ A4

Labels A - F refer to other B&NES studies, in this case the Greenbelt Review, and do not accord with the site boundaries of this report. They are included on the map figure to allow cross reference.
In summary, development at the Whitchurch site will be:

- **low risk** to the significance of known heritage assets within North West and North East 1.
- **medium risk** within North East 2, South East 2 and South West 2 (although in this latter case it may rise to **high** depending on the full significance of the concentric field pattern).
- **high risk** within South West 1, South West 3, and South East 1.

Development on the site is however considered to present a **medium risk** in relation to unknown archaeological assets and therefore appropriate mitigation would be required (as outlined below).

**Mitigation and Enhancement**

Please note that mitigation and enhancement measures are only provided in relation to areas which have been identified as low or medium risk. As outlined in the NPPF and Table 2.2 of this report, development in areas of high risk should be exceptional or wholly exceptional and therefore avoided as there is a risk that development could cause substantial harm to the designated heritage assets, or non-designated heritage assets of demonstrably equivalent significance, and/or their settings.

If areas of low to moderate risk are allocated for development, it is important that opportunities are taken to avoid or minimise impacts on heritage assets and their settings. These include the following:

- The risk to the known prehistoric and Roman occupation sites to the west of Stockwood Lane, Lyons Court Farm and around the eastern end of Staunton Lane (all of which are considered to be of medium sensitivity) could be mitigated by excluding them from the development area, or by implementing a programme of archaeological works to record the remains prior to their destruction.
- In relation to Queen Charlton Conservation Area It is likely that if development height is limited in the eastern part of the site (to the southeast of Stockwood) and sensitive design is used (ie not blanket low quality housing) risks to the Conservation Area can be reduced.
- Retain and strengthen the existing tree screening surrounding the site, plant new screening along unplanted boundaries to help soften the development, particularly along the southern boundary of the site.

In addition to the known heritage assets there is a significant risk of uncovering presently-unknown archaeological remains within the study site. It would be necessary to carry out an archaeological evaluation to establish whether such remains are present, and identify their date, nature and significance before a decision could be made on whether mitigation measures of the type described in **Appendix 7** are appropriate.

**Site 6: East Keynsham**

The following provides a summary of the study findings in relation to East Keynsham. Please refer to **Appendix 6** for the full detailed assessment.

**Site Location and Context**

The East Keynsham site lies directly to the east of the settlement of Keynsham and to the north west of the settlement of Saltford. The site is crossed by the main rail and road (A4) routes between Bristol and Bath. The site comprises a number of fields along with existing land uses of housing, a horticultural nursery and light industrial units. The Core Strategy consultation document identifies the site as mixed use development to include 25,000-30,000m² of employment land in an expansion to Broadmead/Ashmead/Pixash Industrial Estate and around 250 dwellings in the plan period.

The site is set within an area of open countryside bordering the settlement of Keynsham. To the north is Avon Valley Country Park and to the south is the Manor Road Community Woodland Local Nature Reserve which is part of the Forest of Avon.
The site lies on the edge of a low plateau of level or very gently sloping land that falls downwards into the Avon Valley, ranging in height between approximately 15 and 45m AOD in height. The fields to the south of the Bristol to Bath railway line are predominantly pasture. The land to the north is mostly arable.

**Summary of Risk to Heritage Assets**

**Archaeology**

3.131 The B&NES and South Gloucestershire Historic Environment Records include no designated assets within the site. Within the study area there is one Scheduled Monument, a Bronze Age barrow at Bitton. Also within the area are three locally designated parks and gardens – Ellsbridge House Garden adjacent to the site, Chewton Place Garden, and a small part of the Memorial Park at the western edge of the area. These are not archaeologically significant as gardens, but the last includes the Scheduled remains of Keynsham Abbey, though this is outside the 1km study area. There are two locally listed structures, Ferris Bridge and Swinford railway bridge, on the north side of the Avon.

3.132 The only recorded prehistoric or Roman evidence from within the site is the line of the Roman road between Sea Mills and Bath. The known alignment of the Roman road could be severely affected by development, and any physical remains severely damaged. It is considered to be of medium sensitivity and the risk to the heritage asset is high. Within the study area, prehistoric activity is indicated by finds of flint artefacts, a Bronze Age axe and the Scheduled barrow, and one find of Iron Age pottery. There is extensive Roman activity in the wider area, including a farmstead close to the side at Avon Valley Country Park, and burials, a coin hoard and other finds elsewhere within the area.

3.133 There is no evidence for Anglo-Saxon occupation within the site, although a cemetery is known approximately 750m to the north east. The only evidence found for medieval activity on the site and its immediate environs comprises possible vestiges of ridge-and-furrow cultivation observed on air photographs. In the study area, there are many records relating to the historic centre of Keynsham to the west of the site. Post-medieval occupation within the site include an engine house, though it is not certain from the HER description exactly to what this refers, and farms but no sites of major importance. The probable buried medieval agricultural remains (mainly ridge and furrow) suggested by air photo evidence, and the post-medieval (?site of the) engine house, Stidham Farm and Downfield Farm are all of low sensitivity and low risk.

3.134 The site is considered to have low to moderate potential for unknown prehistoric archaeological remains within its overall extent and moderate potential for Roman remains. Occupation is likely to have been in the form of scattered farmsteads, but these can be expected to form localised foci and would typically be surrounded by areas containing remains associated with field systems. The potential for remains of later periods is low. The overall risk of development encountering unknown remains over the remainder of the site is considered to be of medium risk, although it is unlikely that the distribution of unknown remains will be uniform across the site.

3.135 In the absence of further investigation the possible presence of unknown buried archaeological remains of high sensitivity cannot be discounted, and any assessment of risk made here can only be provisional.

**Historic Buildings**

3.136 There are listed buildings on the site but 60 within 1km of the site boundary. Three key listed buildings were considered in detail in the assessment, Elsbridge House (Grade II), Keynsham Manor and Keynsham Manor West (Grade II) and Pixash Lane Bridge (Grade II),

3.137 The reverse ZTV indicates the visibility of development on the site from Elsbridge House, however the house is hidden behind dense hedging and has little direct relationship with the Keynsham East site. The house is also situated within existing development along the A4. Development of the site would therefore pose a low risk to the heritage significance of Elsbridge House.

3.138 With regard to Keynsham Manor and Keynsham Manor West, the two houses face north from Keynsham Manor Road with an extensive outlook across open farmland. The reverse ZTV from this location indicates that development on the site would be visible, but development would not extend into the remaining fields between Keynsham and Saltford which provides the open setting.
to the buildings. Hedgerow boundaries along the eastern site boundary and within the site should be retained and strengthened to break up development in the view. On the assumption that the above mitigation is implemented the development of the site would pose a **low risk to the heritage significance of Keynsham Manor and Keynsham Manor West.**

3.139 In relation to Pixash Bridge, development which proposed alterations to the listed bridge would pose a **high risk to the heritage significance of the bridge.**

*Conservation Areas*

3.140 There are two Conservation Areas within the study area. The setting of setting of the **Keynsham High Street and Keynsham Dapps Hill Conservation Area** are unlikely to be affected. Analysis of the ZTVs indicate there may be small areas within the eastern side of the Keynsham High Street Conservation Area from which the development is visible but in reality the built development between the Conservation Area and the potential development site will intervene. Development of the site would therefore pose a **low risk to the heritage significance of the Conservation Areas.**

*Registered Parks and Gardens*

3.141 There are no Registered Parks and Gardens within 1km of the site. There are three locally designated gardens within 1km: Chewton Place Garden, Elsbridge House Garden & Memorial Park but the **risk to these sites is low.**

*World Heritage Site*

3.142 This site lies outside the zone of theoretical visibility for the WHS and this is therefore not considered further.

*Summary of Combined Risk to Heritage Assets*

3.143 **Table 3.6** and **Figure 3.6** summarises the combined risk to the significance of known heritage assets within the East Keynsham site in relation to each identified land parcel/ field.

**Table 3.6: East Keynsham, Summary Table of Risk to the Significance of the Heritage Asset**

<table>
<thead>
<tr>
<th>Fields</th>
<th>Arch.</th>
<th>Historic B’dings</th>
<th>CA</th>
<th>RPG and local gardens</th>
<th>Overall judgement</th>
</tr>
</thead>
<tbody>
<tr>
<td>All fields forming the site</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>Low</strong></td>
</tr>
<tr>
<td>Route of the Roman Road</td>
<td><strong>Red</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>High due to the risk to the heritage significance of the Roman Road</strong></td>
</tr>
<tr>
<td>Location of Pixash Bridge</td>
<td></td>
<td><strong>Red</strong></td>
<td></td>
<td></td>
<td><strong>High, Pixash Bridge would be at risk if developing the north of the side meant altering the bridge</strong></td>
</tr>
</tbody>
</table>
Figure 3.6: East Keynsham, Summary of Risk to Heritage Assets

East Keynsham Summary Map

- **High risk to significance of heritage assets**
- **Medium risk to significance of heritage assets**
- **Low risk to significance of heritage assets**

Risk relating to undiscovered archaeology has not been mapped. It is recommended that a detailed survey be carried out prior to development.

NTS © A4

Labels A1 - C4 refer to other B&NES studies, in this case the ARUP Development Concept Options Report, page 24, and do not accord with the site boundaries of this report. They are included on the map figure to allow cross reference.
3.144 In summary, development at the East Keynsham site will be:

- **low risk** to all the fields within the site.
- **high risk** to the route of the Roman road and Pixash Bridge.

3.145 Development on the site is however considered to present a **medium risk** in relation to unknown archaeological assets and therefore appropriate mitigation would be required (as outlined below).

**Mitigation and Enhancement**

3.146 Please note that mitigation and enhancement measures are only provided in relation to areas which have been identified as low or medium risk. As outlined in the NPPF and Table 2.2 of this report, development in areas of high risk should be exceptional or wholly exceptional and therefore avoided as there is a risk that development could cause substantial harm to the designated heritage assets, or non-designated heritage assets of demonstrably equivalent significance, and/or their settings.

3.147 If areas of low to moderate risk are allocated for development, it is important that opportunities are taken to avoid or minimise impacts on heritage assets and their settings. These include the following:

- The Roman road alignment and any surviving remains could be preserved by incorporating it in the layout of any development, preferably open space or public footpath.
- Avoid any alterations or damage to the Pixash bridge.
- Retain and strengthen existing tree screening within the site, with new trees planted along internal field boundaries to help soften development.
- Utilise new tree planting as a framework throughout the proposed development, with sufficient set back to allow growth of trees which will eventually break up the rooflines of development.

3.148 In addition to the known heritage assets there is a significant risk of uncovering presently-unknown archaeological remains within the study site. It would be necessary to carry out an archaeological evaluation to establish whether such remains are present, and identify their date, nature and significance before a decision could be made on whether mitigation measures of the type described in **Appendix 7** are appropriate.