



Historic England

Ms Catherine Loveday
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Direct Dial: 0117 975 0690

Our ref: P01069718

11 June 2019

Dear Ms Loveday

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND WEST OF PARK FARM, BUTT LANE, THORNBURY, BRISTOL, SOUTH
GLOUCESTERSHIRE
Application No. PT18/6450/O**

Thank you for your letter of 9 May 2019 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

This application site lies to the north of Thornbury Castle. This is a Grade I listed heritage asset with a remarkable history bearing witness to many notable owners, in particular becoming the seat of Edward Stafford - Duke of Buckingham - in the early 1500s. Henry VIII and Ann Boleyn stayed at the Castle in 1535. The complex is highly significant, with further Grade I assets in the form of the Church of St Mary the Virgin immediately to the south, and the outer court and kitchen court walls, and privy garden walls being independently listed. The buried remains of the medieval fortified house and 16th century privy garden are designated Scheduled Monuments, whilst the immediate grounds of the Castle are recognised as a Grade II Registered Park and Garden. The group occupy the northernmost section of the Thornbury Conservation Area. The National Planning Policy Framework highlights that assets of the *highest significance* include grade I and II* listed buildings and scheduled monuments, and that the more important the asset, the greater the weight should be to the asset's conservation.

We raised concerns relating to the neighbouring site to the east in 2011 through consultation on application PK11/1442/O, highlighting potentially harmful effects on the historic environment to the northern part of Thornbury. At this time, we brought attention to the Duke's ambitious expansion of the Castle itself together with the creation of a new deer park to the north and east called New Park with associated



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features such as fishponds (scheduled monument to the north-east) and other water courses. Indeed, it was this scheme of expansion (and his illusions of grandeur which threatened the king) which ultimately led to the Duke's execution. We previously emphasised that despite no formal designation for this New Park, it is relatively easy to read within the landscape - in our view it is not only an important non-designated asset in its own right but as a unique example from the Tudor period of a deliberately designed piece of landscape to be seen in conjunction with the Castle providing a significant and comprehensive setting to this structure. These comments remain equally as relevant to this current application, perhaps even more pertinent given the loss of a portion of this landscape through the construction of the Park Farm development.

The Conservation Area Advice Note for Thornbury acknowledges the very special character of the Castle and Church and associated deer park. The area is identified as 'Around Thornbury Castle and Church' and extends into the open countryside to the north. It emphasises how new development to the east is situated such that it does not intrude unduly into the setting of the Conservation Area. Whilst, in our view, inter-visibility from the north (Oldbury Lane) back towards the Castle is limited, this does not reduce the significance of this landscape as a non-designated heritage asset contributing to an understanding of the grandeur of the Castle and its vast parkland setting; further erosion and loss of this important setting/feature is harmful.

Views of the church tower and upper elements of the Castle are still discernible from the north, but have become subsumed at points by the Park Farm development. Expansion into this open countryside will diminish the prominence of this important feature within its rural setting.

As such, we fundamentally disagree with the Archaeology and Heritage Appraisal under para. 4.5 when it asserts that 'No designated or otherwise significant heritage assets lie within the site.' Whilst this wider landscape may not be designated, it is clearly a significant contribution to the setting of the Castle, and a significant non-designated asset in its own right. We concur with para. 4.7 in that the development will have an adverse effect on the appreciation of the Castle collection of heritage assets, but again disagree with para. 4.8 where it suggests how 'the setting of the Thornbury Castle and church group provides only a limited enhancement of the significance of these structures, with most of this due to the closer parts of its environs which have a parkland character'. Pushing modern development further round to the north will increasingly subsume this significant heritage complex within an ever-growing arc of urbanisation, severing it more and more from its wider setting.

We accept that the level of harm is less than substantial (although certainly not tending towards 'negligible' as proffered within the Heritage Appraisal), we remind the authority that under para. 193 of the National Planning Policy Framework, great weight should be given to an asset's conservation (the more important the asset - and again we



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emphasise just how significant this collection of assets are - the greater the weight should be), irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Furthermore, para. 200 advises how local planning authorities should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance; we consider this application to conflict.

Whilst we therefore do not support this application, if you are minded to accept the principle of development on this site, we would welcome the opportunity to feed into a scheme which preserves, as far as is possible, a meaningful extent of the rural countryside in relation to the Castle complex.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 196 and 200.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

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