

CHAPTER 7: ARCHAEOLOGY & BUILT HERITAGE

- A7.1 This chapter of the ES Addendum updates the ES with respect to the following:
1. Updating of policy, including NPPF and PPG;
 2. Considers latest scheme proposals; and
 3. Minor additions to text for clarity and amendment of typographic errors in original.
- A7.2 All amendments are highlighted in red and underlined. Appendices have not been updated as they remain valid as historical documents relevant at their dates of completion.

7.1 INTRODUCTION

- 7.1.1 This chapter of the ES has been produced by Ben Stephenson of BSA Heritage Limited and provides an assessment of the potential impacts of the Proposed Development on archaeological remains and cultural heritage receptors. It reflects changes to the proposals from an original application made in December 2018.
- 7.1.2 The chapter sets out the methodology which has been used to secure baseline information and to assess the impact of the Proposed Development. The Chapter summarises the known baseline conditions, and then considers the likely impacts during the construction phase and following occupation. Mitigation inherent to the proposals and further appropriate mitigation is suggested where appropriate, and this informs the concluding assessment of residual and cumulative effects.

7.2 ASSESSMENT CRITERIA & METHODOLOGY

Previous Assessment

- 7.2.1 There are no records of previous assessments on the Project Site.

Legislative Context

- 7.2.2 The relevant 1979 and 1990 Planning Acts¹ are a consideration. In particular, the requirement in the 1990 Act that, in reaching planning decisions, the local planning authority should have special regard to preserving listed buildings and their settings and the character and

¹ Ancient Monuments and Archaeological Areas Act 1979 -and Planning (Listed Building and Conservation Areas) Act 1990.

appearance within conservation areas. More recent legal precedent including in particular the 'Barnwell' case also informs this assessment.

Planning Policy and Guidance

National Planning Policy

7.2.3 Current national is contained in the ~~third~~^{second} edition *National Planning Policy Framework* (NPPF 201~~9~~⁸). The NPPF has very recently been revised for the first time since it was originally issued in 2012. Although the section on heritage and archaeology has been re-worded and paragraph numbers ~~were~~^{have} changed with the second edition, the requirements set out are substantively unchanged.

7.2.4 The NPPF still requires that the impact of development on significant 'heritage assets', including 'designated heritage assets' and their setting, be considered when development is proposed. Heritage assets are any aspect of the historic environment which has such significance that it is a material consideration when reaching a planning decision. Designated heritage assets include listed buildings, registered landscapes, conservation areas and scheduled monuments. Confusingly, the NPPF defines locally listed buildings as 'non designated heritage assets' alongside other elements with no formal designation.

7.2.5 Substantial harm to designated heritage assets as a result of proposals should be 'exceptional' (paragraph 194), and any planning decision which results in less than substantial harm to the significance of a designated heritage asset should weigh the harm against the benefits of the proposals in reaching a decision (paragraph 196). Where permission is granted, despite some harm resulting, suitable further investigation is set out as a possible requirement (paragraph 199).

Local Planning Policy

Current Planning Policy

7.2.6 The adopted Development Plan includes both the South Gloucestershire *Core Strategy* and adopted *Policies Sites and Places Plan* (SGC 2013 & 2017); and the relevant policies which have informed the assessment are Policies CS1, CS9 and PSP17.

7.2.7 Policy CS9: Managing the Environment and Heritage includes the requirement that new development should '*...ensure that heritage assets are conserved, respected and enhanced in a manner appropriate to their significance.*'

7.2.8 The *Policies, Sites and Places Plan* contains Policy PSP17: Heritage Assets and the Historic Environment which confirms that proposals must preserve or enhance those elements of a listed building's setting which preserve or enhance their special architectural or historical interest.

7.2.9 Policy PSP17 also states that development affecting the most important archaeological remains, whether scheduled or not, should seek to preserve these *in situ*. It may be acceptable to investigate less significant remains in order to mitigate the effects of the proposals, subject to suitable post-excavation analysis and assessment. The policy also requires that 'locally important heritage assets', including locally listed buildings and other assets recorded by the HER be preserved or enhanced as appropriate to their significance.

Emerging Planning Policy

7.2.10 The New South Gloucestershire Local Plan 2018 to 2036 is currently in preparation and will replace the *Core Strategy* and *Policies Sites and Places Plan* in due course. The West of England *Joint Spatial Strategy* is also emerging. These plans ~~are at an early stage, and are therefore~~ considered to have limited weight given that they are not yet adopted and they have consequently not been specifically considered by this assessment.

Guidance/Best Practice

7.2.11 Relevant national and local guidance has been considered, including the most recent version of the Ministry of Housing, Communities and Local Government's Planning Practice Guidance (PPG, October 2019 version available online) and Historic England's *Managing Significance in Decision-Taking in the Historic Environment* and *The Setting of Heritage Assets* (Historic England 2015 & 2017). SGC's publications relating to Locally Listed Buildings and Thornbury Conservation Area have also been considered (SGC 2008 and 2004) alongside the SGC *Technical Advice Note: Understanding Heritage Assets* (2016).

7.2.12 Since the Project Site was first considered, Historic England has issued a new edition of their *The Setting of Heritage Assets*. This varies the order and wording of the original guidance, but is in many ways little changed. However, given the perception of some confusion amongst stakeholders since the first version of the guidance was produced in 2011, a key additional paragraph relating to churches has been added:

'Being tall structures, church towers and spires are often widely visible across land- and townscapes but, where development does not impact on the significance of heritage assets visible in a wider setting or where not allowing significance to be appreciated, they are unlikely to be affected by small-scale development, unless that development competes with them, as tower blocks and wind turbines may. Even then, such an impact is more likely to be on the landscape values of the tower or spire rather than the heritage values, unless the development impacts on its significance, for instance by impacting on a designed or associative view.'

Baseline Data Collection

- 7.2.13 The assessment of the potential impact on heritage assets and potential sub-surface archaeological remains has been informed by consultation with the South Gloucestershire Historic Environment Record and Historic England's National Heritage List for England and Gloucestershire Record Office. Online sources and a report on recent archaeological evaluation east of the Project Site (associated with the Park Farm development discussed in Chapter 5) as well as site visits in November and December 2017, and April 2018 have also informed this assessment.
- 7.2.14 Further work which has informed this assessment has included a detailed analysis of LiDAR information completed by Air Photo Services in late 2017 (Technical Appendix 7.2). Technical Appendix 7.3 contains a report by GSB SUMO on the results of their geophysical (magnetometry) survey across the entire Project Site. ~~is also likely to be required to inform an EIA.~~
- 7.2.15 Given the recording of a number of geophysical and LiDAR anomalies which might reflect sub-surface archaeological remains, trial trenching sampling both anomalies and also areas in between was completed in April 2018 by AC Archaeology (Technical Appendix 7.4). The results of these investigations have also informed this assessment.
- 7.2.16 The assessment has also been informed by documents produced by other members of the Project team and, in particular, the revised Landscape and Visual Assessment chapter of the Environmental Statement (Chapter 13), as well as its supporting appendices.

Proposed Assessment Methodology

- 7.2.17 Having established the baseline conditions through consideration of existing sources and the results of fieldwork, this ES Chapter assesses the initial impact, mitigation and residual impact with reference to the latest legislation, policy and guidance.
- 7.2.18 Significance criteria have been formulated which reflect terminology, policy, guidance and best practice. These reflect the importance of a receptor (being the heritage asset) and the magnitude of impact (or rather magnitude of change).
- 7.2.19 Explicit in Government policy is that Grade I and II* listed buildings and registered landscapes, World Heritage Sites and all scheduled monuments and other archaeological remains of national importance have greater importance (also referred to as 'sensitivity') than Grade II listed buildings and registered landscapes and conservation areas which are noted to have lower importance. A professional judgement has been made in relation to undesignated archaeological remains and heritage features, informed by professional judgement, which would rate as of similar sensitivity.

7.2.20 Importance (sensitivity) can be moderated by the current condition of an asset or change to an historical setting. Where large areas are designated, not all of the area will have the same importance (sensitivity). Table 7.1 sets out the approach taken within the EIA Chapter, with professional judgement used where a heritage receptor falls across two columns.

Table 7.1: Importance of Receptor

Receptor	High	Medium	Low	Negligible
World Heritage Site (reflecting universal value)	X			
Scheduled monument	X			
Grade I or II* listed building	X			
Grade I or II* Registered park or garden	X			
Registered Battlefield	X			
Grade II listed building	X	X		
Grade II Registered park or garden	X	X		
Nationally important archaeological remains / non-designated heritage	X			
Conservation Area (reflecting special character & appearance)	X	X		
Locally listed building		X	X	
County/Regional archaeological remains / non-designated heritage		X	X	
Locally important archaeological remains / non-designated heritage assets			X	
Historically significant hedgerows/banks			X	
Limited interest remains			X	X

7.2.21 Magnitude of impact considers the scale and duration of any impact. Most direct impacts will have a 'large impact' in terms of magnitude. Effects on setting will tend to have a lower magnitude. The magnitude of impact will be based upon the criteria set out in Table 7.2.

Table 7.2: Magnitude of Change

Major	Moderate	Minor	Negligible	None
Complete change to asset				
	Considerable change to asset			
		Limited change to asset		
			Minimal change asset	
				No change to asset

7.2.22 An impact may be adverse or beneficial. For example, beneficial heritage effects can result from the removal of threats to an asset or improved management and interpretation which allows a better appreciation of the asset.

7.2.23 Following the evaluation of importance and magnitude of change, the significance of effect is assessed using the criteria shown in Table 7.3 below.

Table 7.3: Significance of Effect Assessment Matrix

Importance of Receptor		Magnitude of Change						
		Major Adverse	Moderate Adverse	Minor Adverse	Negligible	Minor Beneficial	Moderate Beneficial	Major Beneficial
Importance of Receptor	High	Major	Major	Moderate	Neutral	Moderate	Major	Major
	Medium	Major	Moderate	Minor	Neutral	Minor	Moderate	Major
	Low	Moderate	Minor	Minor	Neutral	Minor	Minor	Moderate
	Negligible	Minor	Minor	Negligible	Neutral	Negligible	Minor	Minor

7.2.24 This chapter considers all potential effects, but only effects identified as ‘Major’ will be considered significant for the purpose of the EIA Regulations.

Geographical Scope

7.2.25 HER information has been obtained for a kilometre radius centred on the Project Site. However, consideration of designated heritage assets involved consideration of assets across a wider study area through consultation with the National Heritage List for England and also consideration of the Zone of Theoretical Visibility as provided at Figure 13.12. The initial site visit also informed the geographical scope of the assessment. Given distance and visibility, a number of designated heritage assets, including Oldbury Iron Age hillfort and St Arilda Church to the west have been scoped out as their significance would not be harmed. Assessment of archaeological potential has been informed by information on sites and finds in the study area, but will refer to the Project Site area only.

Temporal Scope

7.2.26 The current archaeological potential and the condition of heritage assets have informed the baseline of this Scoping Chapter. The assessment of effects within the EIA has been undertaken to assess effects during the construction and upon completion of the scheme; albeit consideration has been given to the potential temporal delay in mitigation becoming established and fully functional, for example landscaping, and how this may reduce any impact over time.

7.3 CONSULTATIONS

7.3.1 South Gloucestershire Archaeologist and the Conservation Officers provided comments which informed the Scoping Opinion. SGC's archaeologist also agreed Written Scheme of Investigations, and attended site meetings during trial trenching in April 2018. The Archaeologist has since indicated that adequate investigations to inform the planning application have been completed and that the archaeology found within the Project Site is unlikely to preclude development, subject to appropriate mitigation. This is likely to include a requirement to further investigate Iron Age and Roman period remains in the north east of the site, close to Oldbury Lane (see below).

7.3.17.3.2 This revised chapter has also taken account of comments provided by the South Gloucestershire Conservation Officer, Robert Nicholson and dated to 31st January 2019. In some instances, assessment of the significance of effects differs between the author and conservation officer.

7.4 BASELINE ENVIRONMENT

7.4.1 There are no designated heritage assets within the Project Site, nor any known undesignated built heritage assets. The fields are defined by hedgerows, and these have low- importance. In one field in the south of the site area, very faint vestigial likely medieval ridge and furrow running from west to east can be discerned (Figure 7.1). In the south east of the Project Site, a small number of linear channels, accentuated in parts by being embanked, are likely to reflect post-medieval meadow drainage. Both medieval and later earthwork features have low importance.

Archaeological Assets

7.4.2 Recent archaeological evaluation, consisting of desk based research, detailed LiDAR analysis and both geophysical survey and trial trenching has identified one area of sub-surface archaeological remains within the Project Site which would rate as of local importance (Appendices 7.1 – 7.4).

7.4.3 Overall the site area was surprisingly low in sub-surface remains given the Romano-British and late prehistoric remains identified at Park Farm to the east, and settlement of the area from prehistory. Indeed, with the exception of undated ditches and pits, which are of low to negligible importance, only one area of archaeological interest was identified by the archaeological evaluation; and a further area identified beyond the Project Site boundary.

7.4.4 The area of interest within the Project Site lies adjacent to Oldbury Lane, in the north east of the Project Site (Figure 7.1). Here, geophysical survey had provided the strongest indication of sub-surface features across the whole Project Site. Subsequent trial trenching revealed Romano-British and Iron Age pits and ditches in four of six trenches. The levels of pottery and other material, including bone and slag, indicated this area lay on the periphery of a settlement, but was of low importance.

- 7.4.5 To the south of the Project Site and adjacent to the north of Watch Oak Lodge, an area of Roman activity included evidence of metal-working which was indicated in two trenches by finds of slag, hammerscale and pottery in ditches and pits (Figure 7.1). This falls outside of the Project Site and will not be impacted by the Proposed Development, and as such is scoped out of this assessment.
- 7.4.6 Ditches found across the Project Site suggest that it may have been farmed from prehistory. Survival of ridge and furrow north of the Project Site (HER 17005) and in the south indicate that at least some of the Project Site lay in cultivated medieval open fields. Consideration of aerial photographs and LiDAR, as well as the results of geophysical survey and trial trenching confirmed that ridge and furrow was historically much more extensive across the Project Site and its environs. Land closer to the watercourses may have been meadow as regular flooding would have provided rich pasturage.
- 7.4.7 As more widely, the open fields are likely to have been enclosed in the post-medieval period. Unusually, a very early detailed map of 1716 was available at Gloucestershire Archives which confirms the layout of the Project Site and its environs three centuries ago. Some field boundaries remain unchanged from this time (Figure 7.2). However, the map also confirms that the fields in the west of the site have been rearranged since.
- 7.4.8 Fields closest to the watercourses have names containing 'Meade', indicating that they were used for grazing rather than arable. Several small blocks of woodland appear to have been added in the century and a half between the 1716 estate map and first edition detailed Ordnance Survey maps (Figure 7.2). By circa 1880 'Thornbury Park' (Grade II) had been built north east of the castle and several fields surrounding it are shown to include clumps of trees. One of these lies just within the Project Site, bracketing the stream on the southern boundary.
- 7.4.9 The only 'parkland' evident on the 1716 map is a scattering of trees in the field south east of the Project Site; which hasis now hadving sports pitches associated with the consented Park Farm scheme constructed within it (see Table 5.3).
- 7.4.10 The HER records a possible post-medieval canal as having followed the route of extant watercourses to the south and west of the Project Site. This is not a designated heritage asset, but would rate as of local to county importance (HER 1563). However, site visits and consideration of historic maps are not definitive as to whether the canal was ever in fact constructed.

Designated Heritage Assets

- 7.4.11 Within the study area there are a number of designated heritage assets, lying to the south and east of the Project Site on the edges of Thornbury. These are shown in Figure 7.1 and on plates in Appendix 7.5.
- 7.4.12 The Thornbury Castle complex of designated heritage assets sits circa 400m south of the Project Site. It includes the Grade I listed main building itself, a late medieval 'great house' built for the 3rd Duke of Buckingham in the early 16th century and which sits on the site of an earlier manor house (Plate 1, Appendix 7.5). The walls enclosing the main house and its curtilage are separately listed (Grade I, Plates 2 & 3), whilst two lodges to the south are Grade II listed (Plate 4). Immediately south of the Thornbury Castle lies the Grade I listed medieval Church of St Mary the Virgin (Plate 5).
- 7.4.13 Part of the castle site is also designated as a scheduled monument given the potential for sub-surface remains relating to its earlier phases of use. The castle structure and its immediate surroundings are also designated as a Grade II Registered Park and Garden (Figure 7.1). This is an unusually small area for a Registered landscape. Although the works commissioned by the 3rd Duke of Buckingham are known to have included the creation of a much larger area of new parkland, it is not clear where this lay.
- 7.4.14 Research and a site visit confirm that Thornbury Castle is orientated to the south and west, with its principal facades facing towards the church, albeit with an intervening wall (Plate 3). A driveway enters the castle site from the west and passes through an imposing curtain wall (Plate 2). The northern part of the castle site is now the service area of the hotel which occupies the site. The arrangement of buildings suggests that this was always an ancillary area facing away from the town, but with good views across lower land to the north including the Project Site in a wide vista and beyond a defensive wall. However, the north eastern stretch of wall has since been lost.
- 7.4.15 The church is an imposing structure lying close to the castle and has an unusually tall tower (Plate 5). It faces south onto open green and buildings beyond (Plate 6). Within its churchyard lie separately Grade II listed tombs, gravestones and Thornbury's war memorial. This area is nonetheless enclosed by vegetation and level topography. The main part of Thornbury town centre, centred on its high street is not visible from the vicinity of the church.
- 7.4.16 The northern edge of Thornbury Conservation Area lies to the south of the Project Site; at a distance of approximately eighty metres at its closest point. Its northernmost parts extend across undesignated parkland which relates to Thornbury Castle. This may have only relatively recently have become 'ornamental'. It is noted as 'Castle Meade' and 'Harding Parke' on the 1716 estate map, but these titles do not of themselves denote parkland and they are not shown as planted with trees at the time, although an area to the east is.

- 7.4.17 The conservation area extends a considerable distance to the south, enclosing the earlier parts of Thornbury, focussed on Castle and High streets. The character and appearance of the conservation area in its north is very different to its character to the south, which is more urban.
- 7.4.18 Further designated heritage assets lie south and east of the Project Site. A Grade II listed early 19th century main building lies at Shieling School, east of Thornbury Castle and church (HER 11449, Plate 7). A post-war hall at the school is designated as a locally listed building (HER 15695). The main building at Shieling School is a converted 19th century house which is marked as 'Thornbury Park' on the circa 1880 Ordnance Survey map and was at that time surrounded by a ha-ha and planted grounds, with a more open parkland landscape around it (Figure 7.2).
- 7.4.19 It is possible that earlier parkland elements were incorporated in this new design, but that shown on the late 19th century maps is focussed on the 19th century building. The development of the site as a school in the post-war period has led to a range of buildings to the south and east and the site is also well vegetated.
- 7.4.20 The principal elevation of the house is to the north. As the house lies on higher land than the Project Site, there are views towards it, but these are screened by the strong belt of woodland and trees running east west through the southern part of the Project Site.
- 7.4.21 East of the Project Site lies a scheduled area of fishponds on level ground and which now lie in woodland (Figure 7.1, HER 2813). These are thought to have been part of the works commissioned by the 3rd Duke of Buckingham in the early 16th century and are shown on the 1716 map.
- 7.4.22 North of these lie three Grade II listed former farmhouses and barn including Park Farm and Morton House (HERs 7427, 7426 & 11451, Plates 8 & 9). These are all thought to have 18th century origins. Nearby lies a locally listed bridge over the brook (HER 15680). The consented plans, and site visits confirmed that the committed development at Park Farm will eventually enclose both the scheduled fishponds and listed structures (Plate 10).
- 7.4.23 In light of site visits and background research, it is assessed that the site area itself does not make a contribution to the significance of most of the heritage assets described above, or an appreciation of their significance. Even though there are views between the site and the church spire given the church's elevated position, the site lies at too great a distance to contribute to its significance. This is also the case for most listed buildings, the Thornbury Conservation Area and Registered landscape at Thornbury Castle.
- 7.4.24 The site area forms part of a much larger area which can be considered to contribute to the significance of Thornbury Castle given that there is likely to have been a proprietorial link historically and that the defensive role of the castle would have benefited from the open land surrounding it. Views northwards from Thornbury Park listed house would have taken in its

designed parkland, almost all beyond the site. The site itself is only a small component of this wider setting and has a limited role in the contribution of the setting to the significance of Thornbury Castle. Nonetheless, the parkland may have included and would have been framed by open and wooded areas on the southern edge of the site such that these areas also contribute to the significance of the listed house.

7.5 INHERENT DESIGN MITIGATION

- 7.5.1 The proposals locate open space provision principally in the south of the Project Site, as shown on the Green Infrastructure Parameter Plan (Figure 3.3). This has the effect of creating a greater distance between designated heritage assets and the proposed built form. Design of detention basins within these open areas will appear as they do now, with an open, grassed aspect.
- 7.5.2 The open space in the south of the Project Site will also retain most of the surviving earthworks which have been identified through the assessment process, including vestigial ridge and furrow and likely post-medieval drainage ditches.
- 7.5.3 Retention of woodland and tree belts within the Project Site and also hedged boundaries as far as is practicable will also retain the screening benefits of these elements, as well as the intrinsic significance of retained field boundaries. The proposals also include additional 'thickening' planting and improved management of hedgerows and trees within the Project Site which will benefit the setting of some assets.
- 7.5.4 Views of the church tower exist from within the open fields of the Project Site (Viewpoint 7 – Figure 13.20). Vistas will be retained as part of the layout of new buildings, which will generally be no greater than two storey in height. Although this is not necessary mitigation in heritage terms, it does have landscape and social benefits.

7.6 POTENTIAL ENVIRONMENTAL IMPACTS & EFFECTS

Construction Impacts and Effects

- 7.6.1 Effects assessed below to known assets within the Project Site are all direct, long-term and permanent.
- 7.6.2 A short stretch of some tens of metres of likely post-medieval drainage ditch would be lost in the west of the Project Site, where a detention basin is proposed. As this feature is of only low importance the magnitude of effect is assessed as moderate and the significance of the effect is potentially **minor** adverse.
- 7.6.3 Stretches of hedgerow (1.3km) will be lost in the centre of the Project Site, although much of the site's hedgerow system will be retained on the boundaries and also within the Project Site; in addition, part of the 1.3km of hedgerow loss will be translocated, alongside new hedgerow

planting. Where lost, these low importance assets will be subject to a moderate magnitude of change given that much of the surrounding network will be retained. This represents a potential **minor** adverse effect.

- 7.6.4 The Project Site has been subject to thorough archaeological evaluation. This indicates one area of low importance is likely to be subject to major change in the north east. This represents a potential **moderate** adverse effect.
- 7.6.5 Although the Project Site is not designated as an historic landscape, it has historically been an area of open agricultural land. There is no surviving physical evidence for the Project Site having been part of a medieval park. It is known that parkland planting has never extended into the Project Site from the south and west. Moreover, the early 18th century layout of fields has changed over time, with the integrity of the landscape compromised by field realignment, and development to the south and east. In light of this, the historic landscape of the Project Site would be ascribed negligible importance and, given a major magnitude of change, the impact of the Proposed Development would be assessed as a **minor** adverse effect.
- 7.6.6 It is possible that retained hedgerows, earthwork features and known sub-surface remains might be accidentally harmed during the construction programme. These elements are of low importance, but the magnitude of change could be up to major and therefore a potential **moderate** adverse effect could result.
- 7.6.7 The Proposed Development has the potential to cause indirect harm to nearby designated heritage assets through changes to the setting of listed buildings, scheduled monuments and Thornbury Conservation Area. However, the effects of construction are considered alongside those of occupation below for these assets.

Occupation Impacts and Effects

- 7.6.8 As with construction effects, any potential harm to nearby designated heritage assets through change to setting is likely to be long term/permanent.
- 7.6.9 The scheduled fishponds and listed buildings with agricultural origins lying east of the Project Site would originally have had their significance enhanced by the surrounding open field setting. However, this has been lost given the committed residential development at Park Farm. Given this, no further harm to significance would stem from the Proposed Development. Similarly, no harm would be caused to the locally listed bridge.
- 7.6.10 The potential for impacts on Thornbury Castle's range of designated heritage assets through impact on their setting has been considered. The site includes Grade I listed structures and scheduled and Registered areas of high importance. The land to the north, although not now providing any evidence of having been part of the castle's park, was owned by it and has

retained an open rural aspect in the main since the medieval period. The raised position of the castle not only provides for long-distance views, but has value in reflecting the defensive benefits of its site, albeit that parts of the castle defences have since been lost.

- 7.6.11 However, it is likely that the late medieval castle constructed for the 3rd Duke of Buckingham looked out over an open field system or parkland rather than regular enclosed arable and pasture fields. More recent development including the committed Park Farm, 20th century residential and educational development, as well as large modern farm structures have changed its setting. The proposed edge of new built development would lie more than 600m from the castle's northern wall and, despite its elevation, the strong framework of woodland and field boundary vegetation already screens the site from the castle as demonstrated by Viewpoint 7 (Figure 13.20).
- 7.6.12 In light of these factors, the effect on the significance of the castle, and associated listed wall, scheduled monument and registered park and garden, is assessed as of negligible magnitude and hence a **neutral** effect.
- 7.6.13 For similar reasons, the Grade I listed church south of, and screened by, the castle, as well as nearby individually Grade II listed buildings would be negligibly adversely affected, with a **neutral** effect. As set out in the latest guidance relating to assessment of the impact of proposal on setting, that the church tower can be seen from some points within the Project Site does not necessarily reflect an adverse effect.
- 7.6.14 A 19th century Grade II listed house which is now part of the Shieling School lies slightly north of the castle and church complex, but is still more than 500m from where new built development is proposed. In the late 19th century this was 'Thornbury Park' and appears to have lain in a wider planned parkland landscape. Nonetheless, none of the parkland lay within the Project Site except in the southernmost field where open space is proposed (Figure 7.2). Despite views north from the house, strong vegetation on the edge of the developed parts of the Project Site would prevent any harm resulting from the change in land use beyond and as illustrated in Viewpoint 9 (Figure 13.22) and the Photomontages contained in Technical Appendix 13.4. A negligible magnitude of change for this high to medium importance receptor is assessed; resulting in a **neutral** effect.
- 7.6.15 Parts of Thornbury Conservation Area extend north of the listed castle and listed former Thornbury Park house. The designated area includes land which has a parkland character, although much of the conservation area has an urban character. Even if this is a relatively recent evolution in land use, the areas are closely related to the designated assets to the south and can be assessed to be of high importance. However, the character and appearance of this part of the conservation area would not be affected by the Proposed Development, with the

proposed open space retaining the openness for some distance around the Conservation Area, and therefore a **neutral** effect is assessed.

7.6.16 If an early post-medieval canal does lie south and west of the Project Site, this would rate as of medium importance. However, any substantive change to proposed land use would lie several hundred metres north or east of the possible route of the canal. The intervening level ground would remain open and grassed and built development would lie beyond a strong tree belt. No harm to the significance of the putative canal would stem from the Proposed Development.

7.6.17 The limited archaeological remains recorded by the archaeological evaluation do not suggest that any water-logged deposits lie within the Project Site or in such close proximity that the Proposed Development could affect them through changes to the water table over the long-term.

7.7 ADDITIONAL MITIGATION, COMPENSATION AND ENHANCEMENT MEASURES

7.7.1 Mitigation of effects on nearby heritage assets where change to setting would cause harm is already inherent to the scheme design.

7.7.2 To mitigate potential accidental harm to features of local interest which are to be retained, the scheme's Construction Environmental Management Plan (CEMP) will highlight these areas so that they are avoided during construction activity, including physical barriers to protect assets during construction. This will be secured via planning condition.

7.7.3 It is anticipated that further archaeological investigation will be recommended by SGC's archaeologist and secured by planning condition. A scheme of archaeological works will be agreed, and is likely to include archaeological excavation in the area of significance in the north east of the Project Site and of any earthworks lost in the south east. A watching brief may be required on the periphery of these areas of interest, dependent on the results of excavation.

7.8 RESIDUAL ENVIRONMENTAL IMPACTS AND EFFECTS

7.8.1 Implementation of effective landscaping, construction management and archaeological investigation through planning condition, and at the reserved matters stage should mitigate all effects identified above except those noted below.

7.8.2 Residual **minor** adverse effects would remain due to the direct loss of stretches of hedgerow and the historical (agricultural landscape) of much of the Project Site, which cannot be mitigated.

7.9 CUMULATIVE EFFECTS

7.9.1 It is not standard practice to consider cumulative effects in relation to archaeological remains or common heritage features such as hedgerows within more than one Project Site. Cumulative

effects can arise from adjacent or nearby development through changes to setting which affect the significance of heritage assets.

- 7.9.2 In relation to potential cumulative effects, most of the permitted development identified for Thornbury lies beyond areas of modern development and has no relationship with any of the designated heritage assets identified as potentially affected by the Proposed Development. Permitted development at Park Farm, parts of which are completed and under construction and as such are considered in the baseline, are visible from locations close to the castle, church and listed house to their north east, and the development at Land West of Pound Mill Business Park, to the north of Oldbury Lane have been considered.
- 7.9.3 However, as with the relationship between the Project Site and the elevated designated assets to the south, distance and intervening vegetation limit any adverse effect. At present, the construction of the Park Farm development might be assessed as causing a minor adverse effect to the castle, but future establishment of soft landscaping may reduce this potential effect to neutral. As a **neutral** effect has already been assessed for the Proposed Development, no greater cumulative adverse effect is assessed.

7.10 ASSESSMENT SUMMARY

- 7.10.1 An archaeology and heritage assessment has been completed for the site and has been informed by initial desk based assessment, site visits and the results of phased archaeological evaluation including LiDAR and magnetometry surveys and trial trench evaluation. The chapter has also been informed by the [latest](#) scheme parameter plans and landscape and visual impact assessment.
- 7.10.2 The site consisted of enclosed fields, with some hedgerows marking boundaries dating to at least the early 18th century. In the south of the site, a number of likely post-medieval drainage ditches and vestigial ridge and furrow survive as earthworks. The site is likely to have been cultivated open fields in the medieval period with more extensive but now ploughed out ridge and furrow indicated by research and survey. No other features of note lie within the site, with no indication of formal parkland.
- 7.10.3 The site area appeared from initial research to have some potential for earlier sub-surface remains, with later prehistoric and Roman features located to the east. The archaeological evaluation actually indicates a paucity of remains within the areas to be developed, with only one small area of Iron Age and Roman ditches and pits in the north east of any note.
- 7.10.4 The initial research also identified a number of designated heritage assets which lie close to the site and in locations where their significance might be affected by proposed change. These included the Grade I listed Church of St. Mary the Virgin and Thornbury Castle, which also

includes a scheduled area and small Grade II registered park and garden area. This important complex lies south of the site and on higher ground.

- 7.10.5 A number of Grade II listed buildings to the south and east of the site, including a 19th century house at Shielings School and a locally listed building at the school were also considered. A scheduled group of fishponds now under woodland south east of the site and the northern tip of Thornbury Conservation Area which lies very close to the site's southern boundary were also considered.
- 7.10.6 Research concluded that more distant listed buildings, a scheduled hillfort at Oldbury and most of Thornbury Conservation Area would be unaffected by the proposals and were scoped out of further consideration. A non-designated heritage asset, a putative canal, would theoretically run to the west of the site, following existing water courses. The effect of the proposals on the setting of this possible asset was also considered.
- 7.10.7 The assessment concluded that the proposals would potentially cause minor to major harm to sub-surface archaeological remains and drainage earthworks and minor to moderate harm to hedgerows and the wider historical landscape through planned change/removal or accidental loss during the construction phase. However, suitable mitigation including further archaeological investigation and measures to avoid accidental harm were recommended.
- 7.10.8 The potential effects of the completed proposals on a range of designated heritage assets, including Thornbury castle and church and on other locally significant assets through change to their setting was also considered. However, given distance, the nature of assets and the strong framework of trees and hedgerows between the two, a neutral effect was assessed in all cases.
- 7.10.9 No adverse cumulative effects were assessed for the site and nearby permitted developments. Given the implementation of suitable mitigation, most potential adverse effects could be avoided or reduced to neutral. It was concluded that only a minor adverse residual effect due to loss of hedgerows and the existing historical agricultural landscape would remain.

Table 7.4 Archaeology and Cultural Heritage Summary

Environmental Effect	Sensitivity of Receptor	Nature of Impact	Impact Magnitude	Significance	Additional Mitigation	Residual Impact Magnitude	Residual Significance of Effect	Confidence Level
Construction Effects								
Post Medieval Drainage Ditch	Low	Partial removal of feature	Moderate	Minor Adverse	Further investigation	Moderate	Neutral	High
Loss of hedgerow	Low	Partial removal of feature	Moderate	Minor Adverse	n/a	Moderate	Minor Adverse	High
Archaeological Remains (north-east area)	Low	Removal of feature	Major	Moderate Adverse	Further investigation	Negligible	Neutral	High
Historical Landscape	Negligible	Partial loss of feature	Major	Minor Adverse	n/a	Major	Minor Adverse	High
Retained Features (including hedgerows, ditches, earthworks)	Low	Potential impacts during construction	Major	Moderate Adverse	CEMP	Negligible	Neutral	High
Operation Effects								
Impact on Grade I listed Thornbury Castle and listed walls; scheduled monument and Grade II Registered Park and Garden	High	Potential impact through change to setting	Negligible	Neutral	n/a	Negligible	Neutral	High
Impact on Grade II listed lodges	High-Medium	Potential impact through change to setting	Negligible	Neutral	n/a	Negligible	Neutral	High
Impact on Grade I listed Church of St Mary the Virgin	High	Potential impact through change to setting	Negligible	Neutral	n/a	Negligible	Neutral	High
Impact on Grade II listed Sheilings School (Thornbury Park)	High-Medium	Potential impact through change to setting	Negligible	Neutral	n/a	Negligible	Neutral	High
Impact on Thornbury Conservation Area	High	Potential impact through change to setting	Negligible	Neutral	n/a	Negligible	Neutral	High
Impact on potential historical canal feature	Medium	Potential impact through change to setting	Negligible	Neutral	n/a	Negligible	Neutral	High

Cumulative Effects				
Effect	Description	Mitigation	Significance	Confidence Level
Thornbury Castle Complex	The relationship between the Project Site and Park Farm development, and the elevated designated assets to the south, distance and intervening vegetation limit any adverse effect. At present, the construction of the Park Farm development might be assessed as causing a minor adverse effect to the castle, but future establishment of soft landscaping may reduce this potential effect to neutral.	Provision of Green Infrastructure	Neutral	High
Climate Change				
Effect	Description	Mitigation	Significance	Confidence Level
N/A	N/A	N/A	N/A	N/A

Table 7.5 Mitigation Implementation

Mitigation Measure	Implementing Agent(s)	Legal Instrument	Compliance Target	Implementation Timescale
CEMP	Contractor/Developer	Planning condition	Condition Discharge and Implementation	Prior to Commencement
Archaeological investigation	Contractor/Developer	Planning condition	Condition Discharge and Implementation	Prior to Commencement