

## Land at South Farm, Wickwar, South Gloucestershire

### Heritage Impact Assessment

#### edp6190\_r005a

## 1. Introduction

- 1.1 This Heritage Impact Assessment has been written by EDP in order to assess the potential for impacts on the historic environment from the development of Land at South Farm, Wickwar, South Gloucestershire (hereafter known as ‘the Site’). The Site and the proposed development are illustrated on the plan at **Appendix EDP 1** which illustrates up to 180 housing units on the Site along with associated infrastructure, public open spaces and attenuation features.
- 1.2 The report references the information set out in an Archaeological and Heritage Baseline Assessment (EDP, 2021) and should be read in conjunction with this report. The baseline report was written for a larger site area than the current proposals, which form the eastern part of the larger site. As such the Archaeological and Heritage Baseline Assessment represents a valid historic environment baseline assessment for the Site.
- 1.3 In order to illustrate the discussion below, the report contains plans (**Plans EDP 1 - 4**) which are a reproduction of those included within the Archaeological and Heritage Baseline Assessment but with the present Site boundary shown rather than the larger site area.

## 2. Current Planning Policy

- 2.1 Assessment methodology, as well as reference to relevant planning policy and guidance, is set out in Sections 2 and 3 of the Archaeological and Heritage Baseline Assessment. Whilst the majority of this information is entirely relevant to the present assessment, it should be noted that National Planning Policy Framework (NPPF) was updated in 2021. The following paragraphs therefore review the current NPPF as it relates to the historic environment.

### **National Planning Policy Framework**

- 2.2 The revised NPPF was published in 2021 and Section 16 sets out the government’s approach to the conservation and management of the historic environment through the planning process. The opening paragraph (189) recognises that heritage assets are “*an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations*”.

2.3 Paragraph 194 concerns planning applications, stating that:

*“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”*

2.4 Paragraph 199 considers the weighting given within the planning decision to impacts on designated heritage assets, stating that:

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

2.5 Paragraph 200 considers the level of harmful effects on designated heritage assets and states that:

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

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

2.6 With regard to the decision-making process, paragraphs 201 and 202 are of relevance. Paragraph 201 states that:

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

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

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

2.7 Paragraph 202 states that: *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.*

2.8 The threshold between substantial and less than substantial harm has been clarified in the Courts. Paragraphs 24 and 25 of *Bedford BC v Secretary of State for Communities and Local Government* [2013] EWHC 2847 are of relevance here in the way they outline the assessment of ‘harm’ for heritage assets:

*“What the inspector was saying was that for harm to be substantial, the impact on significance was required to be serious such that very much, if not all, of the significance was drained away.*

*Plainly in the context of physical harm, this would apply in the case of demolition or destruction, being a case of total loss. It would also apply to a case of serious damage to the structure of the building. In the context of non-physical or indirect harm, the yardstick was effectively the same. One was looking for an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether [i.e. destroyed] or very much reduced.”*

2.9 In other words, for the ‘harm’ to be ‘substantial’, and therefore require consideration against the more stringent requirements of Paragraph 201 of the NPPF compared with Paragraph 202, the proposal would need to result in the asset’s significance either being *“vitiating altogether or very much reduced”.*

2.10 Paragraph 203 refers to non-designated heritage assets identifying that:

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

### 3. Impact Assessment

#### ***Designated Heritage Assets***

- 3.1 Designated heritage assets are illustrated on **Plan EDP 1**. The Site does not contain any designated heritage assets or parts thereof and so there is no potential for development to result in any direct impacts upon any designated heritage asset.
- 3.2 The Archaeological and Heritage Baseline Assessment sets out the methodology for the consideration of indirect impacts upon heritage assets through change within their settings in accordance with Historic England (HE) guidance, Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (HE 2017 Second Edition).
- 3.3 In this regard, the Archaeological and Heritage Baseline Assessment focused on Steps 1 and 2 of the five-step process set out by HE. The assessment therefore concentrated on the following three main areas:
- Identifying those heritage assets that could potentially be affected by the proposed development of the larger site and the manner (if any) in which they would be affected (Step 1);
  - Defining the contribution made to their significance by their setting (Step 2); and
  - Assessing whether any part of the larger site forms a part of their setting, and therefore whether it contributes to their significance (part of Step 2).
- 3.4 Whilst the Archaeological and Heritage Baseline Assessment made preliminary comments on how development might impact upon designated heritage assets, Steps 3 and 4 and the discussion of the effect of any mitigation were deferred to future assessment of an established scheme.
- 3.5 In this regard, for the Site, this Heritage Impact Assessment addresses Steps 3 and 4 of the setting assessment process (HE 2017) in that it:
- Assesses the effects of the proposed development, whether beneficial or harmful, on the significance of the designated heritage assets to which the Site contributes or, the ability to appreciate their significance; and
  - Explores ways of maximising enhancement and avoiding or minimise harm with reference to the current proposals.



*Wickwar Conservation Area*

- 3.6 The southern edge of the Wickwar Conservation area is located 335m to the north of the Site. The conservation area's special interest is described in detail in the Archaeological and Heritage Baseline Assessment.
- 3.7 In summary, the conservation area encompasses three parts of the village of Wickwar, which reflect its special architectural and historical interest: the High Street which contains numerous listed buildings with an uninterrupted frontage that encloses the streetscape; the area to the north around the Grade II\* listed parish church of Holy Trinity; which has an open character and contains earthwork remains of early settlement and an area of open land to the west of the village which, aside from the preservation of historic walking routes, and, at its northern end, the Grade II listed building Hill House, contains little of its 'special interest' with its inclusion in the conservation area being on account of it providing an agricultural context to the village and due to the views to the village from across its open spaces.
- 3.8 It is noteworthy that the land at the Site is not visible from the central or northern parts of the conservation area including the High Street and the various historic buildings along and around it, which is where the majority of its special interest is concentrated.
- 3.9 The Archaeological and Heritage Baseline Assessment describes how the farmland to the south-west of the conservation area is experienced in views from the open, western part of the conservation area, reflecting an experience of the conservation area's 'rural setting' which is defined as an element of its 'special interest' in its Character Appraisal (South Gloucestershire Council, 1998).
- 3.10 A view corridor is identified in the Archaeological and Heritage Baseline Assessment which is centred on a natural dip formed by a stream which follows the western boundary of the Site. In this view the 'rural character' of the landscape on the edge of the conservation area is experienced. The northern fields that lie just south of the conservation area are most visible with the land further south, including the western parts of the Site becoming less visible with the increasing distance.
- 3.11 The visible land to the south is experienced as part of the general 'rural' landscape which surrounds the village on this side. Nevertheless, the view is not identified in the Character Appraisal as a 'key view' and is not attained from a part of the conservation area which possesses any great degree of inherent special interest. As noted above, it is explained in the Archaeological and Heritage Baseline Assessment that the farmland from where the view is possible is included as part of the conservation area as it represents a key part of the rural setting of the village rather than because it contains any features of intrinsic heritage interest.
- 3.12 As such, the view south from this part of the conservation area is of limited relevance to its overall character and appearance, only contributing to it on account of its general rural character reflecting the historic, rural setting of the village.

- 3.13 As such, and in accordance with the Archaeological and Heritage Baseline Assessment, it is considered that, on account of their presence in the southerly view from the western part of the conservation area, the north-western field at the Site and the western edge of the field to the south of this, which is also part of the Site, due to their 'rural character' as experienced in the view, contribute only to a very minor degree to the character and appearance of the Wickwar Conservation Area.
- 3.14 The development of these fields for housing would reduce the instance of pastoral farmland in the view south from the western part of the conservation area, albeit this part of the asset itself forms the immediate farmland setting to the settlement. However, the development (see **Appendix EDP 1**) has considered the conservation area's setting and implements two measures in its design that will mitigate impacts. These comprise a belt of open space on the western edge of the Site that will ensure an open, green character to the visible land on this edge, and the provision of an enhanced boundary on the northern edge of the Site that will be subject to additional tree planting. This boundary will, at least partially, screen housing located beyond it once the tree line has matured and soften the visual effect of the development.
- 3.15 With these mitigation measures embedded in the design, the character of the view south will be largely unchanged and will continue to reflect the village's historic, rural setting. Housing will probably be just visible but will be seen at least partially screened by trees and situated on the eastern side of the Site and, would be seen up against existing modern agricultural buildings at South Farm and other residential development along Sodbury Road (B4060) beyond. As such, the development would impart little change to the conservation area's wider setting and the assessment concludes that its character and appearance would be preserved.

*Grade II\* listed building Frith Farmhouse*

- 3.16 The Grade II\* listed building is located 440m to the west of the Site. Whilst the Archaeological and Heritage Baseline Assessment identifies that the westernmost two fields of the larger site (as considered in the Archaeological and Heritage Baseline Assessment report) do represent part of the setting of the listed building and do contribute to its significance, it also identifies that no other parts of the larger site have any intervisibility with the house or any historical or functional association with it. This includes the entirety of the present Site as considered within this assessment.
- 3.17 As such, the assessment concludes that the land at the Site makes no contribution to the significance of the listed building and its development would have no impact upon it.

*Grade II listed building South Farmhouse*

- 3.18 The Grade II listed farmhouse is located c 28m to the north of the Site. The Site comprises farmland that was historically associated with, and farmed from, South Farmhouse, and is located to the south of the building.

- 3.19 The Archaeological and Heritage Baseline Assessment describes how there is an historic and functional connection between South Farmhouse and the farmland within the Site. However, these associations are most evident where the farmland provides the surroundings in which the listed building is experienced (i.e. its setting).
- 3.20 From within the Site, a clear view of the farmhouse is not possible for the most part, as it is partially or completely screened by intervening modern farm buildings, field boundary hedgerows or the residential buildings and garden boundaries to the south of the farm. At most, a view of the roof and chimneys is possible. The only location within the Site from where the house can be experienced with a measure of clarity is from the small field to the immediate south of it, from where views are uninterrupted (see Image EDP 19 in the Archaeological and Heritage Baseline Assessment).
- 3.21 As such, in accordance with the analysis presented in the Archaeological and Heritage Baseline Assessment, the small field to the immediate south of the farm makes a minor contribution to its significance, but the wider Site, on account of its historical association, makes a very minor contribution.
- 3.22 For the small field, development would result in an access road crossing the field from east to west with allotment gardens proposed to the north of this route. Notwithstanding sheds and trees associated with the allotments, these features would retain the field's openness and, an experience of the farmhouse would still be possible in views across this space. Whilst the listed building would remain appreciable and would be seen in conjunction with its stone walls and historic outbuildings, it would no longer be viewed from pastoral farmland from this direction and thus an aspect of its historic farmland setting would be lost.
- 3.23 Likewise, for the other fields within the Site these would, for the most part, lose their characteristics as farmland. It should however be noted that the retention of open space on the western edge of the development as well as the retention of field boundary hedgerows within the layout would preserve a small degree of the former character of the land and its former status as farmland would be appreciable.
- 3.24 Given these factors, the Site's development as proposed would result in only a very minor degree of less-than-substantial harm to the Grade II listed building South Farmhouse. This impact would be due to a change in character to part of its historically and functionally associated farmland setting, albeit the change only being clearly visible in conjunction with the farmhouse from the field to the immediate south.

### ***Non-designated heritage assets***

#### *Known assets within the Site*

- 3.25 With reference to the Archaeological and Heritage Baseline Assessment the Site does not contain any known non-designated heritage assets. Two records on the South Gloucestershire Historic Environment Record (HER) are located within the Site (both shown on **Plan EDP 2**).

- 3.26 The first, is part of a wider monument record relating to 'Wickwar settlement (South)' (14048). This area reflects the extent of a linear, post-medieval settlement that extended to the south along Sodbury Road from Wickwar as defined by the Avon Historic Landscape Survey (undertaken in 1998). The part of the Site within this area may have once contained development related to the settlement, it now contains no above ground features related to any settlement activity that predates South Farm (which is included in this area). Nevertheless, it is considered that there is a moderate potential for this area to contain buried archaeological remains of low or very low significance that relate to post-medieval settlement activity within the small field adjacent to the roadside.
- 3.27 Cartographic sources (**Plans EDP 3 and 4**) indicate that this area, in the 19<sup>th</sup> century, contained gardens associated with South Farmhouse and possibly an 'oxhouse' associated with the farm to the south that is beyond the Site boundary. There is therefore also considered to be a moderate potential for buried remains in this part of the Site of low or very low significance that relate to activity within this period.
- 3.28 The Site also contains an HER record for an area of ridge and furrow cultivation earthworks that were recorded from historic aerial photographs examined as part of Historic England's National Mapping programme (NMP). During the site visit, this field was not seen to contain ridge and furrow earthworks anymore and it is presumed that the earthworks visible in the aerial images have since been ploughed away by modern farming. Consequently, there is a moderate potential that the Site contains buried remains of infilled furrows in this location which would be of very low significance.

*Previously unrecorded assets within the Site*

- 3.29 With reference to the Archaeological and Heritage Baseline Assessment, the following summary considers the potential for previously unrecorded archaeological remains being present within the Site.
- 3.30 Historic map analysis has indicated that the Site was agricultural land, since at least the post-medieval period, and that it has been subject to a mixed regime of arable and pastoral agriculture in the 20<sup>th</sup> century. This land-use is likely to have resulted in below ground impacts on archaeological remains from ploughing. Impacts are especially likely to have occurred on remains located at shallow depths. Given that archaeological remains were demonstrated to have survived in the adjacent Land South of Horwood Lane site, c. 10m to the east of the Site boundary, it is likely that archaeological remains within the Site have not been completely removed by ploughing.
- 3.31 The HER analysis indicates a low potential for buried remains dating from the Prehistoric periods. Such remains are most likely to be related to past agriculture carried out in the more intensively settled later prehistoric periods (such as the Bronze Age or Iron Age) and thus consist of buried infilled ditches or pits, of low or moderate archaeological interest. There is also a low potential for stray artefacts dating from the earlier prehistoric periods (Palaeolithic, Mesolithic, Neolithic).

- 3.32 Whilst the Archaeological and Heritage Baseline Assessment assessed a potential for prehistoric ritual or funerary remains these were considered most likely to be present within the western part of the larger site and not in the eastern areas that comprise the Site as assessed in this report. As such, it is very unlikely that the Site contains ritual or funerary features that might be of such high significance that they would require preservation *in situ* within the masterplan. Remains of lower significance, such as agricultural or settlement archaeology, as described above, could be recorded archaeologically by way of mitigating for their loss. As such, the presence of prehistoric remains would not constrain the Site's development as proposed.
- 3.33 The assessment has identified a moderate potential for Roman period remains within the Site. Archaeological evidence suggests that the Site was probably situated within an agricultural landscape in the Roman period and the most likely scenario is that the Site may contain buried remains such as infilled ditches or pits related to agricultural activity that would be of low significance. By way of mitigating their loss due to development, such remains could be recorded archaeologically and thus their presence would not constrain the Site's development.
- 3.34 It is highly likely that the Site contains remains related to agricultural activity during the medieval, post-medieval and modern periods. It is likely that buried infilled furrows, drainage ditches and former boundary ditches are present within the Site. Such remains would be of limited archaeological interest and would be considered of low or very low significance. The loss of such remains should not require archaeological mitigation.
- 3.35 It should be considered that this report concludes only on the basis of a consideration of desk-based resources and that, in order to provide a more complete picture of the Site's archaeological resource archaeological evaluation may be required. However, the evidence suggests that there is no reason to believe that the site contains archaeological remains of such high significance that their presence would impede the Site's deliverability or capacity for development, and such fieldwork could reasonably be undertaken as part of a planning condition attached to the permission.

#### **4. Conclusion**

- 4.1 This Heritage Impact Assessment concludes that the proposed development of the Site will not result in any direct impacts upon any designated heritage assets, such as scheduled monuments, listed buildings, registered parks and gardens, world heritage sites, registered battlefields or conservation areas, that would potentially constrain its development.
- 4.2 Potential impacts upon the settings of designated heritage assets have been considered in accordance with Historic England guidance: *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (HE 2017 Second Edition). All designated heritage assets identified as having potential for development impacts in the Archaeological and Heritage Baseline Assessment were assessed in order to understand whether the development of the Site, as proposed, will result in any effect on their significance.

- 4.3 The assessment concludes that only a single designated heritage asset will be affected, comprising the Grade II listed building South Farmhouse. The Site's development would result in a very minor degree of 'less-than-substantial harm' to the Grade II listed building. This impact would be due to a change in character of part of its historically and functionally associated farmland setting.
- 4.4 In accordance with Section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* the planning authority should give '*considerable importance and weight*' to the desirability of preserving the listed building's setting although it is up to the authority to assess whether the proposal would result in '*acceptable change*' which, in this case, would only be a very minor impact. This very minor degree of harm should be considered under Paragraph 202 of NPPF (2021) in that '*this harm should be weighed against the public benefits of the proposal*'. As such, the harm identified does not preclude the Site's development but will have to be considered in the planning balance.
- 4.5 The archaeological assessment does not identify any potential for highly significant remains within the Site that might require preservation *in situ*. Other remains of lesser significance could be archaeologically recorded prior to their loss (if deemed desirable by South Gloucestershire Council's planning archaeologist) in accordance with a scope and methodology, following standard archaeological best practice guidance, agreed in advance with the planning archaeologist. As such, if archaeological remains are found to be present in the Site, they would not constrain its development as proposed.

## 5. References

Chartered Institute for Archaeologists (CIfA), 2020. *Standard and Guidance for Historic Environment Desk-based Assessments*. Reading

EDP, 2021, Land at South farm, Wickwar, South Gloucestershire, Archaeological and Heritage Baseline Assessment (EDP6190\_r003a)

Historic England, 2017, *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (HE 2017 Second Edition)

Ministry of Housing, Communities and Local Government (MHCLG) 2021 *The National Planning Policy Framework*. London

HMSO, 1990, *Planning (Listed Buildings and Conservation Areas) Act of 1990*

South Gloucestershire Council, 1998, *Wickwar Conservation Area*. EC/1

South Gloucestershire Council, 2013 *South Gloucestershire Core Strategy*

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**Appendix EDP 1**  
**Framework Masterplan**  
(Turley, Drawing No. 3001/Rev H)





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- KEY**
- Site Boundary (7.89 ha/19.49 ac)
  - Residential Development (4.46 ha/11.02 ac )
  - Area reserved for potential shop extents - to be confirmed (0.15 ha)
  - Open Space including Informal Recreational and Natural & semi-natural urban green space (3.2 ha)
  - Allotments (0.09 ha)
  - PROW (public rights of way)
  - Primary Roads
  - Areas of boundary to be bolstered with additional Planting
  - Existing Hedgerow
  - Existing Trees
  - Proposed Pumping Station
  - 1 Proposed Access Points
  - 2 Proposed LAP (local area of play)
  - 3 Proposed LEAP (local equipped area of play)
  - 4 Proposed attenuation basin
  - 5 Proposed swale

**c.180 homes @ 40dph net**

Application Ref.  
PK16/4006/O - Under  
construction by Bellway  
Homes

Application Ref.  
PK17/4552/O - Approved  
with Reserved Matters on  
behalf of Linden Homes

**CLIENT:**  
Bloor Homes

**PROJECT:**  
Land at Wickwar

**DRAWING:**  
Framework Masterplan

**PROJECT NUMBER:**  
BLOA3039

**DRAWING NUMBER:** 3001 **CHECKED BY:** CD/LN

**REVISION:** H **STATUS:** DRAFT

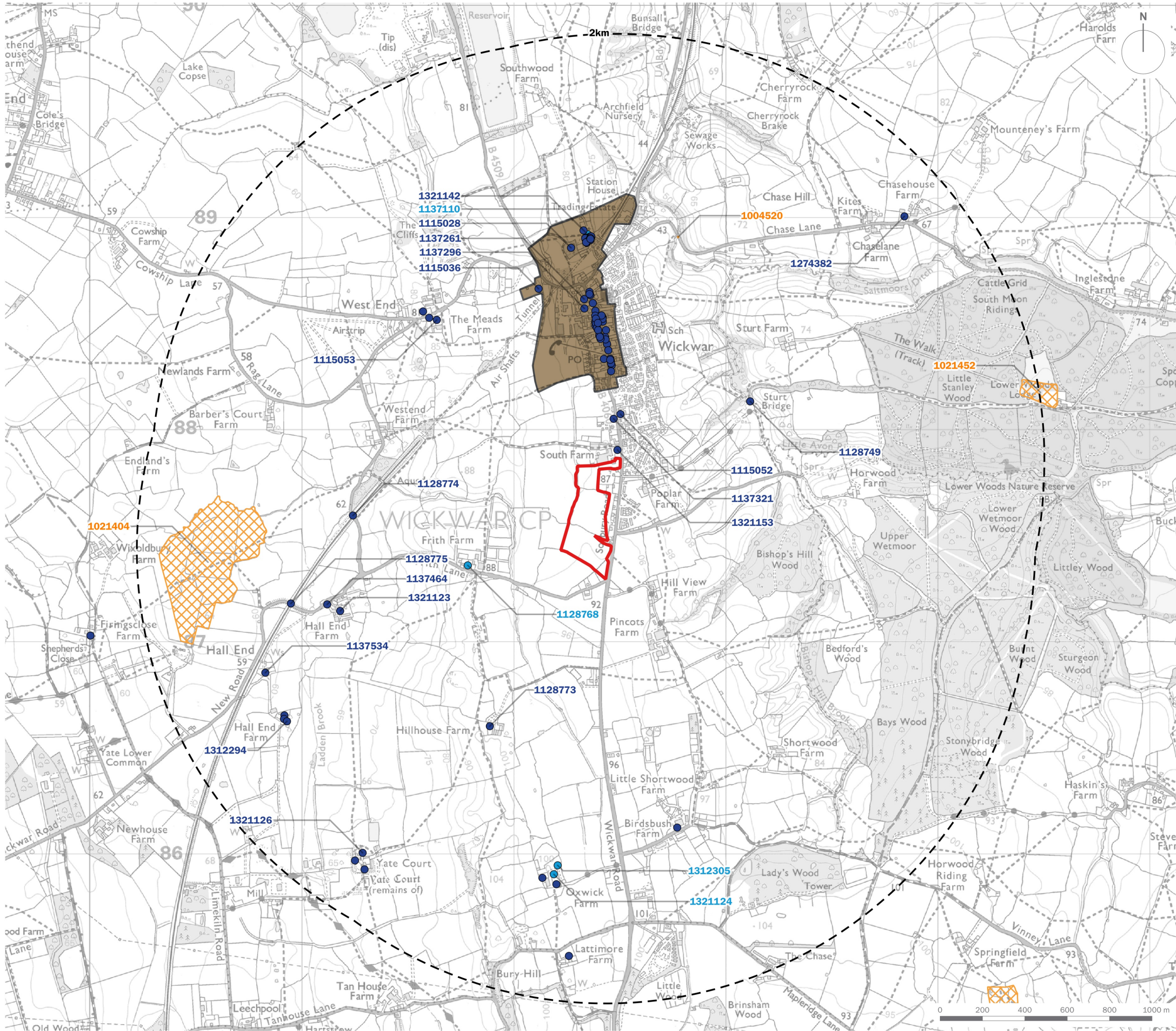
**DATE:** 07/09/2021 **SCALE:** 1:2500 @ A3



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**Plan EDP 1**  
**Designated Heritage Assets**  
(edp6190\_d008b 01 December 2021 MH/RS)





- Phase 1 Site Boundary
- 2km Study Area
- Wickwar Conservation Area
- Scheduled Monument
- Grade I Listed Building
- Grade II\* Listed Building
- Grade II Listed Building

client	Bloor Homes Ltd		
project title	Land at South Farm, Wickwar, South Gloucestershire		
drawing title	Plan EDP 1: Designated Heritage Assets		
date	01 DECEMBER 2021	drawn by	MH
drawing number	edp6190_d008b	checked	RS
scale	1:17,500 @ A3	QA	RB



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**Plan EDP 2**  
**HER Records**  
(edp6190\_d009b 16 September 2021 MH/RS)