



Land at Wisloe Green, Slimbridge/Cambridge, Gloucestershire

Heritage Assessment





CA Project: CR0173

CA Report: CR0173_1

August 2019



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SUMMARY

Project Name: Land at Wisloe Green

Location: Slimbridge/Cambridge, Gloucestershire

NGR: 374847, 202628

In August 2019, Cotswold Archaeology (CA) was commissioned by Gloucestershire County Council and Ernest Cook Trust to undertake a Heritage Assessment in respect of land at Wisloe Green, Slimbridge/Cambridge, Gloucestershire. The land is a proposed allocation in the Stroud Local Plan Review Emerging Strategy and the present assessment will form a technical study to inform this review.

As there are no fixed proposals for the Site, the present assessment does not include a heritage impact assessment, but established the Site's capacity for change in relation to heritage impacts.

The Site has high potential for Romano-British remains associated with roadside settlement adjacent to the Roman road from Gloucester to Sea Mills, which runs parallel with the north-west border of the Site. The Site has some more limited potential for prehistoric and medieval remains. The likely archaeological resource within the Site is not anticipated to be of such significance that it would preclude the development of the Site. However, based on the archaeological potential of the Site, a programme of archaeological evaluation works would be recommended in order to ascertain the nature and extent of such remains, and better establish their heritage significance. With regards to future applications for the Site, local planning policy ES10 (Valuing our historic environment and assets) requires that 'A full programme of work shall be submitted with the application, together with proposals to mitigate any adverse impact of the proposed development, and where appropriate, be implemented through measures secured by planning condition(s) or through a legal agreement'.

An initial settings assessment has established that the Site does not form part of the setting of any designated heritage assets which contributes towards their significance. As such, redevelopment of the Site for traditional scale residential built form would not harm the significance of any designated heritage assets as a result of changes to their setting.

1. INTRODUCTION

- 1.1. In August 2019, Cotswold Archaeology (CA) was commissioned by Gloucestershire County Council and Ernest Cook Trust to undertake a Heritage Assessment in respect of land at Wisloe Green, Slimbridge/Cambridge, Gloucestershire (hereafter referred to as 'the Site').
- 1.2. The Site (Figure 1) is comprised of four parcels (labelled A-D for ease of reference throughout this report) of land which combined total c.77ha. The Site lies just south of the settlements of Slimbridge and Cambridge, with the A38 forming the western/north-western border of the Site and the M5 forming the southern/south-eastern border of the Site. The Site environs are characterised by agricultural fields interspersed with small scale settlement and farm houses.
- 1.3. The Site comprises largely agricultural land, under crop; Parcel B includes riding stables with ménage and various agricultural buildings including a modern Dutch barn and prefabricated steel barns.
- 1.4. The land is a proposed allocation in the Stroud Local Plan Review Emerging Strategy and the present assessment will form a technical study to inform this review.

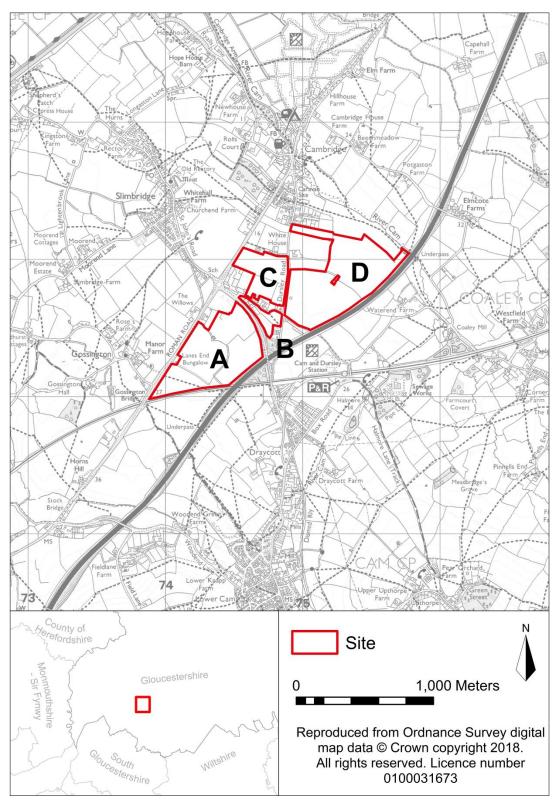


Figure 1 Site location plan

Objectives and professional standards

- 1.5. The composition and development of the historic environment within the Site and wider landscape are discussed in this report. A determination of the significance of any heritage assets located within the Site, and any heritage assets beyond the Site boundary that may potentially be affected by changes to the use and appearance of the Site, is presented. Potential heritage constraints are then discussed.
- 1.6. Cotswold Archaeology (CA) is a Registered Organisation (RO) with the Chartered Institute for Archaeologists (CIfA). Whilst this report doesn't comprise a full Heritage Desk-Based Assessment, it has been prepared, where possible, in accordance with appropriate standards and guidance, including the 'Standard and Guidance for Historic Environment Desk-Based Assessment' published by CIfA (2017).
- 1.7. The 'Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment' (Historic England 2015)clarifies that a desk-based assessment should:
 - '...determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area, and the impact of the proposed development on the significance of the historic environment, or will identify the need for further evaluation' (Historic England 2015, 3).
- 1.8. As above, the present report does not comprise a full Heritage Desk-Based Assessment as no Impact Assessment has been undertaken owing to the early stages of the proposal and thus the absence of any detailed designs. As such, potential impacts are discussed in broad terms and any need for further evaluation works is highlighted.

Statute, policy and guidance context

- 1.9. The Site is located in the local authority of Stroud District Council. The Stroud District Local Plan was adopted in November 2015. Those policies relevant to heritage and the promotion of the Site are reproduced in Appendix 1.
- 1.10. This assessment has been undertaken within the key statute, policy and guidance context presented within Table 1.1. The applicable provisions contained within these statute, policy and guidance documents are referred to, and discussed, as relevant, throughout the text. Fuller detail is provided in Appendix 1.

Consultation

1.11. This assessment has been undertaken in accordance with a Written Scheme of Investigation (WSI), formalising the adopted scope and methodology (CA 2017). The WSI was submitted to Mr Charles Parry, Archaeological Officer, Gloucestershire County Council (GCC), for review, comment and approval prior to the assessment being undertaken.

Statute	Description		
Ancient Monuments and Archaeological Areas Act (1979)	Act of Parliament providing for the maintenance of a schedule of archaeological remains of the highest significance, affording them statutory protection.		
Planning (Listed Buildings and Conservation Areas) Act (1990)	Act of Parliament placing a duty upon the Local Planning Authority (or, as the case may be, the Secretary of State) to afford due consideration to the preservation of Listed Buildings and their settings (under Section 66(1)), and Conservation Areas (under Section 72(2)), in determining planning applications.		
National Heritage Act 1983 (amended 2002)	One of four Acts of Parliament providing for the protection and management of the historic environment, including the establishment of the Historic Monuments & Buildings Commission, now Historic England.		
Conservation Principles (Historic England 2008)	Guidance for assessing heritage significance, with reference to contributing heritage values, in particular: <i>evidential</i> (archaeological), <i>historical</i> (illustrative and associative), <i>aesthetic</i> , and <i>communal</i> .		
National Planning Policy Framework (2019)	Provides the English government's national planning policies and describes how these are expected to be applied within the planning system. Heritage is subject of Chapter 16 (page 54).		
Good Practice Advice in Planning: Note 2 (GPA2): Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015)	Provides useful information on assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.		
Good Practice Advice in Planning: Note 3 (GPA3): The Setting of Heritage Assets, Second Edition (Historic England, 2017)	Provides guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.		
Stroud District Local Plan (adopted 2015)	Comprises the local development plan (local plan), as required to be compiled, published and maintained by the local authority, consistent with the requirements of the NPPF (2019). Intended to be the primary planning policy document against which planning proposals within that local authority jurisdiction are assessed. Where the development plan is found to be inadequate, primacy reverts to the NPPF (2019).		
Hedgerows Regulations (1997)	Provides protection for 'important' hedgerows within the countryside, controlling their alteration and removal by means of a system of statutory notification.		

Table 1.1

Key statute, policy and guidance

2. METHODOLOGY

Data collection, analysis and presentation

2.1. This assessment has been informed by a proportionate level of information sufficient to understand the archaeological potential of the Site, the significance of identified heritage assets, and any potential development effects. This approach is in accordance with the provisions of the NPPF (2019) and the guidance issued by CIfA (2014). The data has been collected from a wide variety of sources, summarised in Table 2.1.

Source	Data	
National Heritage List for England (NHLE)	Current information relating to designated heritage assets, and heritage assets considered to be 'at risk'.	
Gloucestershire Historic Environment Record (HER)	Heritage sites and events records, Historic Landscape Characterisation (HLC) data, and other spatial data supplied in digital format (shapefiles) and hardcopy.	
Historic England Archives (HEA)	Additional sites and events records, supplied in digital and hardcopy formats.	
Gloucestershire Archives	Historic mapping, historic documentation, and relevant published and grey literature. Those maps available using the Know Your Place website were not requested at Gloucester Archives.	
Historic England's Aerial Photograph Research Unit	Vertical and oblique aerial photography ranging in date from the 1940s to present.	
Gloucestershire Local Studies Library	Additional publications, grey literature and other materials specific to the locality.	
Environment Agency (EA) website	LiDAR imagery and point cloud data, available from the Environment Agency website.	
Genealogist, Envirocheck, National Library of Scotland & other cartographic websites	Historic (Ordnance Survey and Tithe) mapping in digital format.	
British Geological Survey (BGS) website	UK geological mapping (bedrock & superficial deposits) & borehole data.	

Table 2.1Key data sources

2.2. Prior to obtaining data from these sources, an initial analysis was undertaken in order to identify a relevant and proportionate study area. This analysis utilised industrystandard GIS software, and primarily entailed a review of recorded heritage assets in the immediate and wider landscape, using available datasets.

- 2.3. On this basis a 1km study area, measured from the boundaries of the Site, was considered sufficient to capture the relevant HER data, and provide the necessary context for understanding archaeological potential and heritage significance in respect of the Site. All of the spatial data held by the HER the primary historic data repository for the land within the study area, was requested. The records were analysed and further refined in order to narrow the research focus onto those of relevance to the present assessment. Not all HER records are therefore referred to, discussed or illustrated further within the body of this report, only those that are relevant. These are listed in a cross-referenced gazetteer provided at the end of this report (Appendix 2) and are illustrated on the figures accompanying this report.
- 2.4. A site visit was also undertaken as part of this assessment. The primary objectives of the site visit were to assess the Site's historic landscape context, including its association with any known or potential heritage assets, and to identify any evidence for previous truncation of the on-site stratigraphy. The site visit also allowed for the identification of any readily visible but previously unknown heritage assets within the Site, and assessment of their nature, condition, significance and potential susceptibility to impact. The wider landscape was examined, as relevant, from accessible public rights of way.

Aerial photographs held at Historic England Archives

2.1. Aerial photographs held at Historic England were examined as part of this assessment, ranging in date from 1947 to 2000. The aerial photographs show those 'features' mapped by the National Mapping Programme within the Site, some with better clarity than the transcription. Where a different interpretation is made to that of the NMP, this is detailed within the period sections in Section 4.

LiDAR imagery

2.2. Existing 1m and 2m Digital Terrain Model (DTM) LiDAR data from the Environment Agency was analysed with the specific aim of clarifying the extent of any potential archaeological remains surviving as earthwork features within the Site. The 1m resolution covers only a very small part of the Site whilst the 2m resolution covers the whole Site.

Previous archaeological investigations

2.3. No previous archaeological investigations are recorded within the Site.

2.4. A number of archaeological investigations have previously been carried out within the study area including assessments as well as a range of intrusive works, such as watching briefs, evaluations and excavations. Those of relevance to this assessment are listed in Appendix 2, and the results discussed in Section 4, below.

Assessment of heritage significance

2.5. The significance of known and potential heritage assets within the Site, and any beyond the Site which may be affected by the proposed development, has been assessed and described, in accordance with paragraph 189 of the NPPF (2019), the guidance issued by ClfA (2014) and 'Historic Environment Good Practice Advice in Planning Note 2' (Historic England 2015). Determination of significance has been undertaken according to the industry-standard guidance on assessing heritage value provided within 'Conservation Principles' (Historic England 2008). This approach considers heritage significance to derive from a combination of discrete heritage values, principal amongst which are: i) evidential (archaeological) value, ii) historic (illustrative and associative) value, iii) aesthetic value, iv) communal value, amongst others. Further detail of this approach, including the detailed definition of those aforementioned values, as set out, and advocated, by Historic England, is provided in Appendix 1 of this report.

Assessment of potential development effects (benefit and harm)

- 2.6. The present report sets out the ways in which identified susceptible heritage assets might be affected by changes to the appearance and use of the Site and, where possible, the anticipated extent of any such effects. Both physical effects, i.e. resulting from the direct truncation of archaeological remains, and non-physical effects, i.e. resulting from changes to the setting of heritage assets, have been assessed. With regard to non-physical effects or 'settings assessment', the five-step assessment methodology advocated by Historic England, and set out in the Second Edition of GPA3 (Historic England, 2017), has been utilised (presented in greater detail in Appendix 1).
- 2.7. Identified effects upon heritage assets have been defined within broad 'level of effect' categories (Table 2.2 below). These are consistent with key national heritage policy and guidance terminology, particularly that of the NPPF (2019). This has been done in order to improve the intelligibility of the assessment results for purposes of quick reference and ready comprehension. These broad determinations of level of effect

- should be viewed within the context of the qualifying discussions of significance and impact presented in this report.
- 2.8. It should be noted that the overall effect of development proposals upon the designated heritage asset are judged, bearing in mind both any specific harms or benefits (an approach consistent with the Court of Appeal judgement *Palmer v. Herefordshire Council & ANR* Neutral Citation Number [2016] EWCA Civ 1061).
- 2.9. In relation to non-designated heritage assets, the key applicable policy is paragraph 197 of the NPPF (2019), which states 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 [our emphasis].'

2.10. Thus with regard to non-designated heritage assets, this report seeks to identify the significance of the heritage asset(s) which may be affected, and the scale of any harm or loss to that significance.

Level of effect	Description	Applicable statute & policy
Heritage benefit	The proposals would better enhance or reveal the heritage significance of the heritage asset.	Enhancing or better revealing the significance of a heritage asset is a desirable development outcome in respect of heritage. It is consistent with key policy and guidance, including the NPPF (2019) paragraphs 185 and 200.
No harm	The proposals would preserve the significance of the heritage asset.	Preserving a Listed building and its setting is consistent with s66 of the Planning (Listed Buildings and Conservation Areas) Act (1990). Preserving or enhancing the character or appearance of a Conservation Area is consistent with s72 of the Act. Sustaining the significance of a heritage asset is consistent with paragraph 185 of the NPPF, and should be at the core of any material local planning policies in respect of heritage.
Less than substanti al harm (lower end)	The proposals would be anticipated to result in a restricted level of harm to the significance of the heritage asset, such that the asset's contributing heritage values would be largely preserved.	In determining an application, this level of harm should be weighed against the public benefits of the proposals, as per paragraph 196 of the NPPF (2019). Proposals involving change to a Listed building or its setting, or any features of special architectural or historic interest which it possesses, or change
Less than substanti al harm (upper end)	The proposals would lead to a notable level of harm to the significance of the heritage asset. A reduced, but appreciable, degree of its heritage significance would remain.	to the character or appearance of Conservation Areas, must also be considered within the context of Sections 7, 66(1) and 72(2) of the 1990 Act. The provisions of the Act do not apply to the setting of Conservation Areas. Proposals with the potential to physically affect a Scheduled Monument (including the ground beneath that monument) will be subject to the provisions of the Ancient Monuments and Archaeological Areas Act (1979); these provisions do not apply to proposals involving changes to the setting of Scheduled Monuments. With regard to non-designated heritage assets, the scale of harm or loss should be weighed against the significance of the APPF.
Substanti al harm	The proposals would very much reduce the heritage asset's significance or vitiate that significance altogether.	Paragraphs 193 - 196 of the NPPF (2018) would apply. Sections 7, 66(1) and 72(2) of the Planning Act (1990), and the Ancient Monuments and Archaeological Areas Act (1979), may also apply. In relation to non-designated heritage assets, the scale of harm or loss should be weighed against the significance of the asset, in accordance with paragraph 197 of the NPPF.

Table 2.2 Summary of level of effect categories (benefit and harm) referred to in this report in relation to heritage assets, and the applicable statute and policy.

Limitations of the assessment

- 2.11. This assessment does not comprise a full Desk-Based Heritage Assessment as per the ClfA guidance (2017). However, once design details are available, the present assessment could be revised to include a heritage impact assessment and would then be suitable for submission with any forthcoming application for the Site.
- 2.12. This assessment is principally a desk-based study, and has utilised secondary information derived from a variety of sources, only some of which have been directly examined for the purpose of this assessment. The assumption is made that this data, as well as that derived from secondary sources, is reasonably accurate. The records held by HER and HEA are not a record of all surviving heritage assets, but a record of the discovery of a wide range of archaeological and historical components of the historic environment. The information held within these repositories is not complete, and does not preclude the subsequent discovery of further elements of the historic environment that are, at present, unknown.
- 2.13. The best resolution of digital terrain model LiDAR imagery of the Site, available from the Environment Agency, is 2m (only very limited coverage is available at 1m resolution). Whilst this is sufficient to show some limited earthworks within the Site, including a possible former channel in Parcel A, it is likely that other earthworks of lesser prominence would not be as readily discernible.
- 2.14. A walkover survey was conducted within the Site, which was undertaken in overcast but otherwise clear weather conditions. Access was afforded within much of the Site, though the western half of Parcel A (Figure 1) and the north-western-most field in Parcel D were under tall corn crop and thus could not be viewed. Where the Site was accessible such observations are limited since archaeological remains can survive below-ground with no visible surface indications of their presence. There was sufficient access to heritage assets within and beyond the Site to assess likely impacts upon their significance due to changes to their setting.

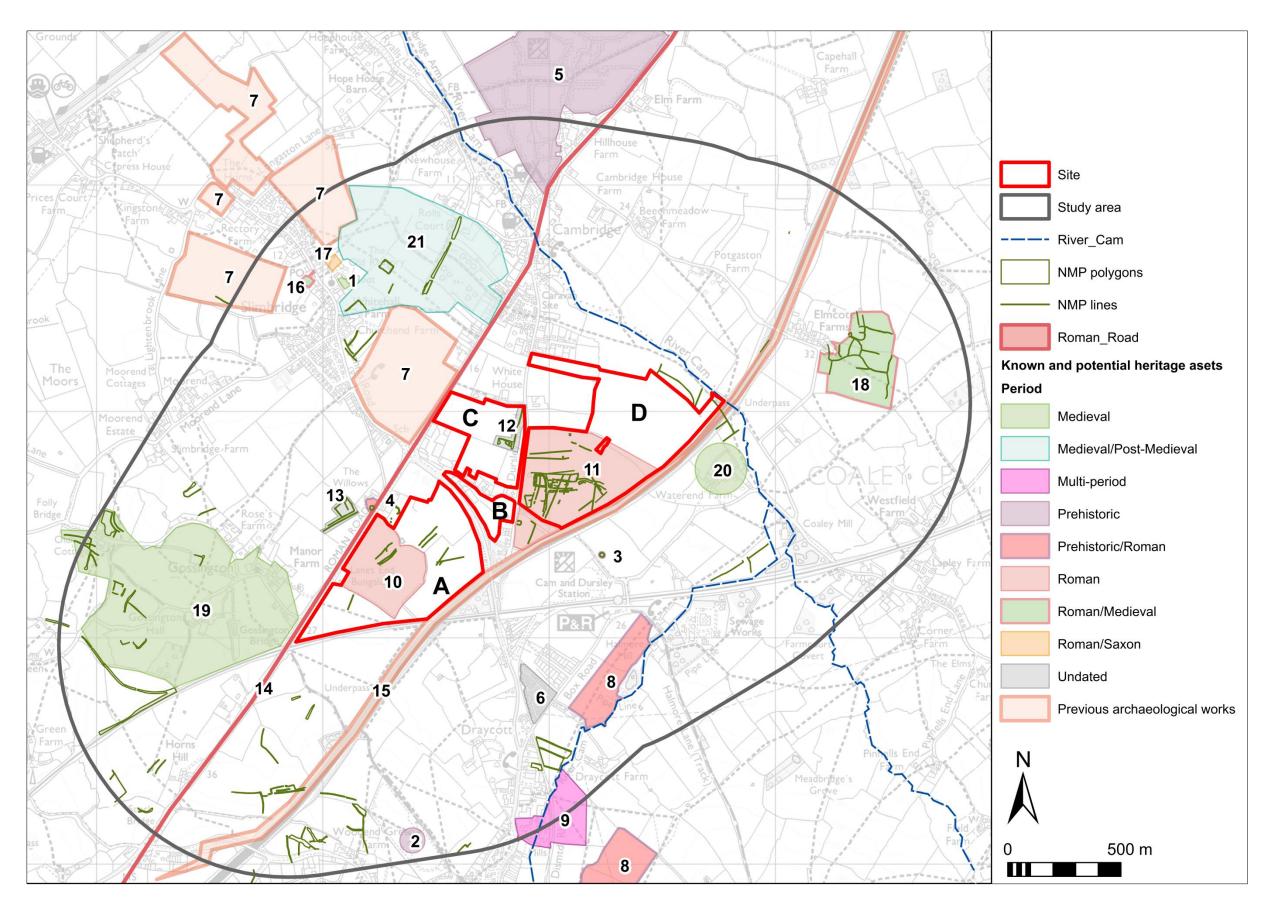


Figure 2 Relevant heritage assets and previous archaeological works

3. ARCHAEOLOGICAL AND HISTORICAL BACKGROUND

Landscape context

- 3.1. The Site is situated in the Vale of Gloucester, which lies between the River Severn and the Cotswolds escarpment. The underlying geology of the area is mapped as Blue Lias clays interspersed with gravel bands and terraces; alluvial deposits are recorded in proximity to the River Severn (Hoyle, 2006). The general character of the topography of this area is level, with some rises generally associated with the gravel terraces. The landscape character is defined by hedged fields with frequent farms and small scale settlement (*ibid*).
- 3.2. The Site is relatively level, and lies at *c*.20m aOD. The landscape of the study area is relatively level, rising gently to the south and south-east towards the slopes of the river valley. The underlying geology of the Site is mapped as Cheltenham Sand and Gravel (BGS, accessed August 2019), placing the Site on one of the gravel terraces. The nearest water course is the River Cam, which forms the north-easternmost boundary of the Site. The River Severn lies *c*.4km north-west of the Site at its nearest extent.

Designated heritage assets

- 3.3. There are no designated heritage assets within the Site.
- 3.4. Within the study area there are 42 listed buildings, most of which are Grade II though one is listed at Grade I (the Church of St John the Evangelist at Slimbridge) and two at Grade II* (both chest tombs associated with the Church). One scheduled monument (see Figure 2, 1) is also located within the study area, also in the village of Slimbridge to the north. Only those designated assets which are directly relevant to the historic development of the Site are discussed in the period summaries below. Those designated assets which may be subject to non-physical impacts associated with the proposed development are discussed in Chapter 5 (The Setting of Heritage Assets).

Prehistoric

3.5. No prehistoric features are recorded within the Site. The HER records a findspot for a 'stone axe' in Parcel B. The axe is said to be of Group VII type and Neolithic in date. However, no further details regarding its discovery or provenance are recorded. This discovery represents a chance find, removed from the Site, and does not comprise a heritage asset.

- 3.6. Evaluation trenching undertaken from *c*.700m north of the Site (Figure 2, **5**) recorded a small charcoal filled feature of late-Mesolithic to early Neolithic date. A possible Neolithic settlement site, represented by two excavated pits, is recorded *c*.900m south of the Site (Figure 2, **2**). The pits contained one of the largest assemblages of this period in Gloucestershire, including the remains of approximately 20 pots, half a mace head, flints, animal bone and fragments of daub. Two flakes of flint debitage (dated to prehistoric only) described as being 'fresh' are recorded (Figure 2, **6**); their condition indicates they are unlikely to have travelled far from their original point of deposition. Excavations *c*.930m south of the Site (Figure 2, **9**) recorded possible deposits or features which had been truncated by later ploughing activity represented by remains of ridge and furrow. The deposits/features contained prehistoric (flint and pottery) as well as Romano-British finds.
- 3.7. The cropmark of a possible ring ditch, c.200m south of the Site (Figure 2, 3), is tentatively dated to the Bronze Age on the HER. Two possible conjoined ring ditches are recorded immediately north of the Site (Figure 2, 4), though no date is attributed. When excavated, such ring ditch features are often found to be the ploughed down remains of round barrows. The main period of construction for round barrows occurred between c.2000-1500 BC, and some have been found to contain burials. The proximity of both features to the Roman road is notable, as both circular and rectilinear houses are a feature of Romano-British rural/roadside settlement (Historic England, 2018), and evidence for Romano-British roundhouses has been excavated c.800m north of the Site (Figure 2, 17, see below for further detail). However, a prehistoric date cannot be ruled out at this stage; barrows can occur anywhere within the landscape and a large number are recorded within river valleys (Historic England, 2018a).
- 3.8. A focus of archaeological features was recorded by evaluation trenching *c*.670m south of the Site (Figure 2, 8). Evidence for later prehistoric activity was recorded on the higher ground to the east of the River Cam (*c*.1.3km south of the Site), including pits and postholes indicative of settlement. A series of small enclosures were recorded on the western edge of the floodplain of the River Cam, predominantly on the gravel terrace overlooking the river; the finds confirmed a Late Iron Age/ early Roman date and indicate continued occupation during these periods. The report notes that the concentration of features along the western edge of the River Cam dropped 'dramatically' in those trenches located further from the river (Holt, 2016). A

series of metal detecting rallies were undertaken in 2017 in the fields surrounding Slimbridge village (see Figure 2, 7). The field immediately north of the Site produced six silver Iron Age coins; it is possible that the coins represent activity associated with this recorded settlement.

3.9. Prehistoric activity is recorded throughout the environs of the Site. The most substantive evidence for settlement, both Neolithic and later prehistoric (Iron Age), was located close to the River Cam, indicative of peoples utilising riverine resources. The Site, which is located on favourable gravel terrace deposits and borders the River Cam to the east (Figure 2), is considered to have some potential for prehistoric deposits. Whilst the potential features recorded within the Site are anticipated to relate to Romano-British roadside settlement (see below) there remains some potential for this settlement to have later prehistoric origins. Thus, whilst a clear focus of settlement is recorded to the south of the Site, the Site is considered to have some potential for later prehistoric remains, comprising either settlement, or activity associated with the excavated settlement to the south.

Romano-British

3.10. The route of the former Roman road from Gloucester to Sea Mills, which broadly aligns with the route of the present A38, former part of the north-western border of the Site (Figure 2, 14). Cropmarks either side of the Roman road have been interpreted as representing possible roadside settlement and activity. One of these areas of associated roadside activity, comprising a possible roadside camp, is recorded in Parcel A (Figure 2, 10). Cropmarks have previously been recorded here by the NMP (as reproduced on Figure 2), and systematic field walking recorded an assemblage of Romano-British pottery sherds and building material fragments; coins are also reported from chance finds and non-systematic metal detecting. The NMP recorded further possible settlement remains in Parcel D (Figure 2, 11), represented by possible enclosures and trackways; this second possible settlement is undated, and could be further roadside settlement, though at least some of the 'features' could also be post-Roman, particularly as some of the features are noted to align to later field boundaries. Undated cropmark 'features' representing enclosures and a possible track are recorded in Parcel C, with the track leading to the main road (Figure 2, 12). These 'features' are presently undated, and the HER notes that historic Ordnance Survey (OS) mapping records proximate extraction pits and suggests these features may represent associated modern extraction activity.

However, the cropmarks were reviewed on the original aerial photographs held at the Historic Archives in Swindon (see Figure 3), and their form suggests a Romano-British date is much more likely at this stage. The cropmarks seen on the aerial photographs appear to show a circular enclosure, within a rectangular enclosure, and are interpreted to represent phased occupation; the circular enclosure being the earlier settlement remains, superseded by the rectangular enclosure. This would be consistent with the general trends of Romano-British settlement whereby initial timber buildings were subsequently replaced with a dwelling of more durable material (Historic England, 2018b).

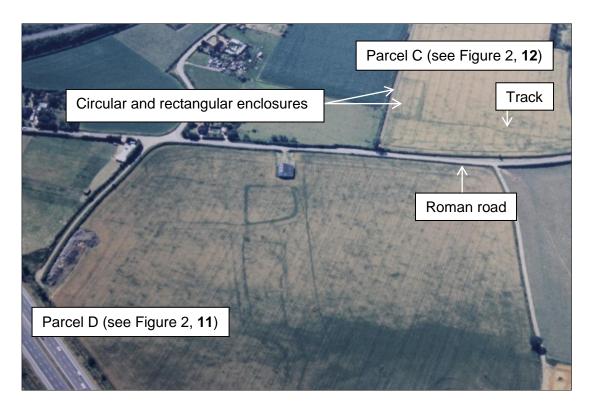


Figure 3 Extract from Aerial Photograph SO 7402/5 dated 18 July 1996, courtesy of Historic England Archives

3.11. Beyond the Site, cropmarks of a further possible enclosure and trackways of unknown date are recorded immediately north-west (Figure 2, 13). A series of metal detecting rallies were undertaken in 2017 in the fields surrounding Slimbridge village (see Figure 2, 7). A concentration of finds was recorded in the southernmost field, which abuts the northern boundary of the Site (Figure 2). In this field, over 1000 coins dating from the late 3rd-4th century were recorded, with particular concentrations in the western half of the field and the north-east corner. Other Roman finds recovered include hair pins, finger rings, brooch fragments and coarse ware pottery. A quantity of bloomer slag was also observed centrally within this field. Roman finds were found

in small quantities in the other fields, but notably 26 Roman brooches were found in the northern-most field, north of the village of Slimbridge. Such a concentration of finds within a defined area may indicate associated below ground remains in both the field adjacent to the Site and to the north of the village despite the lack of cropmarks in these fields. Some of these finds, particularly those in the field adjacent to the Site, may have originated from the probable Romano-British features recorded as cropmarks within the study area, including those within the Site, having been redeposited by medieval and later ploughing activity.

- 3.12. Excavated evidence for Romano-British activity and settlement is recorded further from the road c.800m north of the Site within what is now Slimbridge village (Figure 2, 16 and 17). The HER notes that the features recorded included the remains of probable palisade trenches enclosing a single or ground of roundhouses, including a fill indicative of backfilling to support a palisade wall.
- 3.13. The Romano-British finds recorded elsewhere within the study area (including assemblages from 7, 15, and 18) almost certainly represent material which originated from the above foci of activity and settlement sites, having been disbursed across the local landscape by ploughing activity from at least the medieval period.
- 3.14. Based on the possible features, represented by cropmarks, recorded within the Site, the Site is considered to have very high potential for Romano-British deposits, likely comprising some form of roadside settlement associated with the Gloucester to Sea Mills Roman road. The former road broadly aligns with the route of the A38, which forms the north-western border of the Site, and the Site is thus considered to have some potential for remains of the road itself along this border of the Site (i.e. within Parcels A and C).

Early medieval and medieval

- 3.15. No early medieval or medieval finds or features are recorded within the Site though, as noted above, some of the cropmarks recorded within the Site could be post-Roman in date, particularly those in the east of the Site in Parcel D.
- 3.16. The NMP records extensive ridge and furrow remains of medieval to post-medieval date across much of the study area including areas of the Site (ridge and furrow is recorded In Parcel A, across Parcel B and over much of Parcel D). It should be noted that the NMP record of ridge and furrow within the Site is not a complete record of all ridge and furrow, just that which was visible on aerial photographs dating from the

mid-1940s. No visible remains were observed during the Site visit, and the LiDAR coverage of the Site is not of sufficient resolution to allow for the identification of remains reduced by ploughing. The only clear earthwork within the Site on Environment Agency LiDAR coverage is a curving channel in Parcel A (Figure 4). The curves of the feature seem very unnatural and, based upon the presence of some military features within the wider environs of the Site (not re-produced), a tentative military interpretation was made. However, no military remains are recorded here on the Defence of Britain Archive (2006), and its nature (i.e. archaeological or non-archaeological) and function remain unclear.

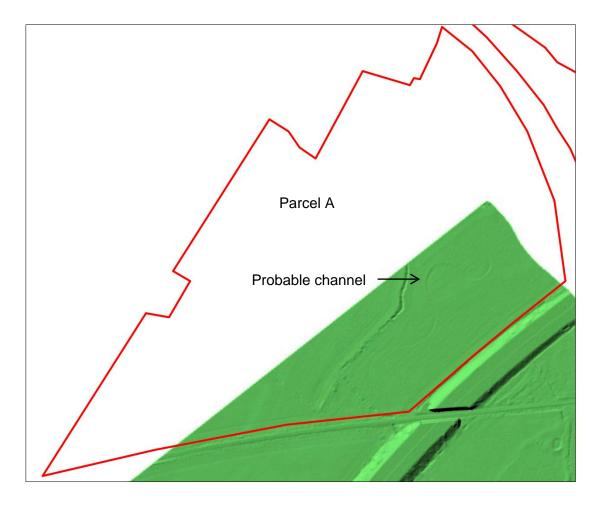


Figure 4 Extract from Environment Agency LiDAR coverage of the Site (1m resolution)

3.17. There are a number of entries for proximate settlements within the Domesday Survey of 1086 at Gossington, Cambridge, Slimbridge and Hurst. The presence of an established settlement at the time of the survey is indicative of pre-medieval origins. Archaeological evidence for a Saxon settlement was recorded during an evaluation c.300m north of the Site at Slimbridge (Figure 2, 17) comprising a deposit containing 5th-century pottery with an associated curvilinear feature. It is suggested in the

- evaluation report that following the Saxon period the settlement foci shifted immediately south towards the area now occupied by the church and vicarage at Slimbridge (Bashford, 1999).
- 3.18. Cropmarks indicative of further deserted medieval settlements are recorded within the study area demonstrating that the medieval settlement within the Site environs contracted during this period, with some never recovering, whilst settlement at Slimbridge and Cambridge persisted and expanded.
- 3.19. A possible former grange (a monastic holding) is recorded immediately west of the Site (Figure 2, 19). The 'features' include rectangular earthworks and enclosures and probably fishponds. This large grange/possible settlement is consistent with the Domesday record for Gossington which records a relatively large settlement (Open Domesday, accessed September 2019). Comparatively, the settlement at Slimbridge and Hurst was said to have been medium in size, and Cambridge very small (*ibid*). A second DMV is recorded c.500m east of the Site (Figure 2, 18), and concentrations of Romano-British and medieval pottery have been recovered from this area. This second DMV is not recorded on the Domesday survey of 1086, and is thus likely to be post 12th-century in date, having been abandoned by the 1800s (as per historic mapping, see below).
- 3.20. Some limited evidence for more sparse settlement is recorded beyond these DMVs comprising five pits containing pottery and burnt bone, which adjoined an area of rammed stone immediately south of Parcel D (Figure 2, 20).
- 3.21. The Site is likely to have formed part of the agricultural hinterland of the now contracted and deserted settlements recorded within its environs during this period. This is evidenced by the ridge and furrow recorded within the Site. However, as some of the cropmark features within the Site have been observed to align with later field boundaries, it remains possible that at least some of the cropmark features within the Site may be medieval in date. It also remains possible that some of the features are Saxon in date, though such remains are, locally, relatively rare.

Post-medieval and modern

3.22. As noted above, evidence for possible late post-medieval/modern extraction activity is recorded in Parcel C (Figure 2, 12). However, based on their association with the Gloucester to Sea Mills Roman road, and the presence of known and potential

- Romano-British remains within the Site and study area, a Romano-British date is considered more likely for these features.
- 3.23. Cropmark evidence recorded *c*.340m north of the Site (Figure 2, **21**) includes features which cut the recorded ridge and furrow suggesting these features represent former post-medieval activity/settlement rather than medieval or earlier features.

Recorded land use within the Site

- 3.24. The First available map to depict the Site in detail was the 1803 Inclosure map of Slimbridge (Figure 5). The field boundaries shows at this time are a mix of highly irregular boundaries indicative of early (pre formal Enclosure Act) enclosure of the former medieval open field system. The more regular field boundaries, particularly those in the south of Parcel A and the arrangement of Parcel C are a result of later reorganisation and amalgamation of smaller field boundaries.
- 3.25. The First Edition Ordnance Survey (OS) map of 1883-1884 shows reorganisation of field boundaries within the Site, including the amalgamation of the smaller field boundaries into larger parcels
- 3.26. No significant changes are shown within the Site between the First Edition OS, the Second Edition OS of 1903, and the Third Edition OS map of 1921-1923. Between the Third Edition OS of 1921-23 and the OS map of 1955 the stables in Parcel B had been constructed (see Appendix 3 and Figure 6). The original stable block is a simple 'L' shaped range, built in red brick in Flemish garden wall bond with a pitched tile roof. The pre-fabricated Dutch barn (Figures 6 and 7) is broadly contemporary, and sometime after 1975 (based on OS mapping) the barn was extended using an additional canopy which adjoins with the stable block, and a concreted block extension was constructed around the formerly open sides (Figures 6 and 7). Three large storage barns were subsequently added to the north-west of the stables (Figure 8). None of these buildings are of any notable heritage value, thus they are of insufficient heritage significance to comprise heritage assets.
- 3.27. In summary, the historic mapping demonstrates that, since the beginning of the 19th century the Site has been utilised as agricultural land. No significant archaeological deposits or features/buildings are associated with agricultural activity within the Site.



Figure 5 Extract from the 1803 Slimbridge Inclosure map (courtesy of Know Your Place)



Figure 6 The stable block in Parcel B. View to the south-west from Wisloe Road



Figure 7 View to the south-west from Wisloe Road



Figure 8 The barns in the north of Parcel B. View to the north-west from Wisloe Road

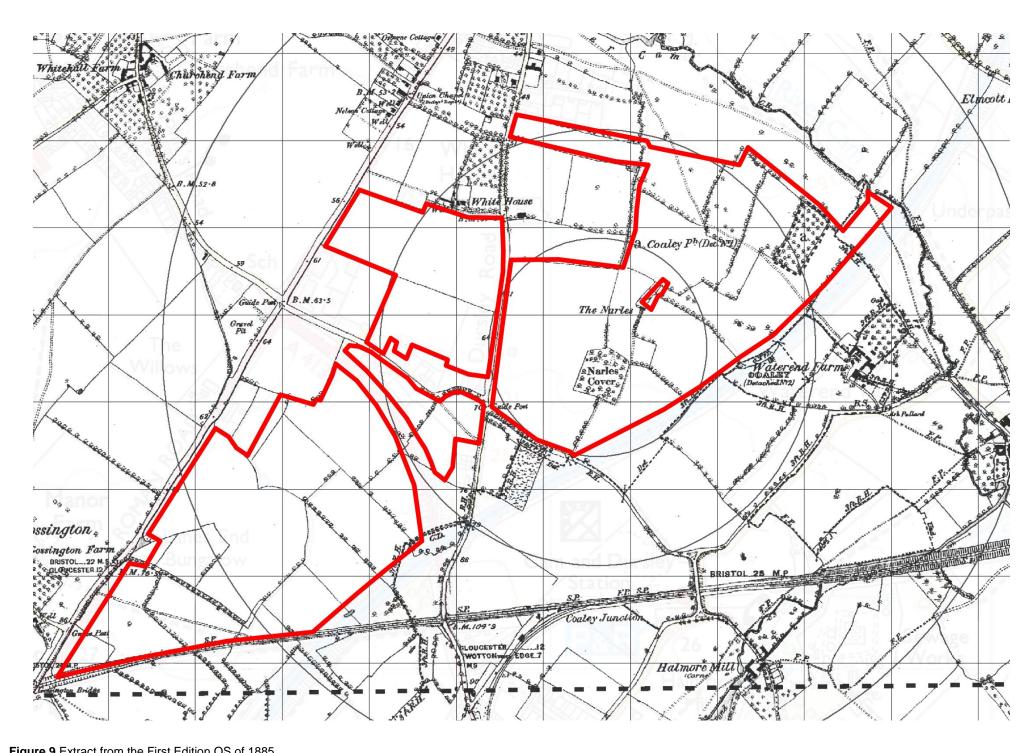


Figure 9 Extract from the First Edition OS of 1885

4. ARCHAEOLOGICAL SIGNIFICANCE & POTENTIAL EFFECTS

Previous impacts

- 4.1. The Site has been subject to ploughing since at least the Medieval period, as demonstrated by ridge and furrow remains previously recorded within the Site. Elsewhere in the study area, medieval ploughing has been found to have impacted below ground remains, reducing their legibility (as recorded during the excavations c.930m south of the Site see Figure 2, 9). As such, it is possible that ploughing will have disturbed at least the upper horizons of the anticipated remains within the Site.
- 4.2. The M5 forms the southern/south-eastern boundary of the Site. The construction of the motorway, which included the creation of a high earthen bank, is likely to have resulted in a significant impact of the on-site stratigraphy in proximity to its route; the exact extent of such disturbance remains unknown. This is particularly relevant to the cropmark 'features' recorded in Parcel D.
- 4.3. There are some buildings within Parcel B, however, stables and pre-fabricated agricultural buildings often have a relatively limited impact on the below ground stratigraphy, thus there is potential for archaeological deposits to survive within their footprint.

The significance of known and potential archaeological remains within the Site

- 4.4. This assessment has identified that no designated archaeological remains are located within the Site; no designated archaeological remains will therefore be adversely physically affected by development within the Site. Known and potential non-designated archaeological remains identified within the Site comprise:
 - Potential prehistoric remains;
 - Possible Romano-British settlement remains;
 - Potential early medieval and medieval settlement remains; and
 - Buried remains of former Medieval and post-medieval ridge and furrow.
- 4.5. The significance of these assets is discussed further below.

Prehistoric remains

4.6. The Site is considered to have some potential for prehistoric remains, particularly remains associated with later Prehistoric settlement recorded to the south, as well as potential settlement remains relating to pre-Romano-British settlement. Such remains

would be of evidential and historic (illustrative) value in their contribution to our understanding of the nature and extent of prehistoric settlement and associated activity within the local environs. Such remains would not be anticipated to be of such significance that they would preclude the development of the Site.

Possible Romano-British settlement remains

4.7. The Site has a very high potential for Romano-British remains, particularly for features and deposits relating to roadside settlement associated with the Gloucester to Sea Mills Roman road. Such remains would be of evidential and historic (illustrative) value, based on their contribution towards our understanding of the nature and extent of settlement during this period, particularly settlement outside of the well-established *colonia* at Gloucester. However, such remains would not be anticipated to be of such value that they would preclude the development of the Site.

Medieval and post-medieval ridge and furrow

4.8. There is potential for the Site to contain buried remains associated with former ridge and furrow cultivation within the Site. Such remains would comprise infilled and buried furrows. Any such remains within the Site would not be of sufficient heritage value to comprise heritage assets.

Possible early-medieval / medieval settlement and activity

4.9. Whilst the cropmark 'features' within the Site are very likely to be Romano-British in date, there remains potential for at least some of these features to be post-Roman in date, representing Saxon or Medieval settlement and / or associated activity. Such remains would be of evidential and historic (illustrative) value based on their contribution towards our understanding of the development of the existing local settlement pattern, and local land use. If the features were found to be of Saxon date, these would be of greater heritage significance than those of medieval date due to their rarity. However, it is unlikely that such remains would be of such significance that they would preclude development of the Site.

Hedgerows

4.10. This assessment has established that the post-medieval enclosure recorded on the Slimbridge Inclosure map of 1803 was subject to boundary removal and alteration during the 19th and 20th centuries, creating larger fields with more regular boundaries which subsequently resulted in the current arrangement of the Site. However, the highly irregular boundaries depicted on the 1803 Inclosure map are thought to represent enclosure of land pre-dating the Parliamentary Enclosure Acts. As such, these hedgerows can be considered 'important' under the archaeology and history criteria of the Hedgerow Regulations 1997. 'Important' hedgerows do not comprise designated heritage assets; the Regulations are essentially a notification mechanism, and the local planning authority would need to approve the removal of such hedgerows. With regards to their significance, the hedgerows comprise heritage assets of very limited heritage significance.

Potential development effects

- 4.11. No designated archaeological remains are recorded within the Site, and no buried remains of commensurate value are anticipated within the Site. As such, the proposed redevelopment of the Site for housing would not result in the truncation or removal of any designated heritage assets or assets of commensurate value.
- 4.12. Any truncation (physical development effects) upon those potential remains identified within the Site would primarily result from groundworks associated with construction. Such groundworks might include:
 - pre-construction impacts associated with demolition and ground investigation works;
 - ground reduction;
 - construction ground works, including excavation of building foundations, service trenches and stripping for roads/car parks;
 - excavation of new site drainage channels (including soakaways); and
 - landscaping and planting.
- 4.13. Depending upon the final construction strategy, development within the Site would be likely to result in the truncation/total removal of the above (4.6-4.10) heritage assets within the Site. However, the implementation of a programme of appropriate, proportionate archaeological works would mitigate the harm of their loss through preservation by record. Based on extensive experience in Gloucestershire, we would anticipate a programme comprising geophysical survey, followed by 2% evaluation trenching across the Site, targeting those features noted within this assessment and any further features recorded during the geophysical survey as well as testing any 'blank' areas. Following these investigative works, a programme of mitigation would be required.

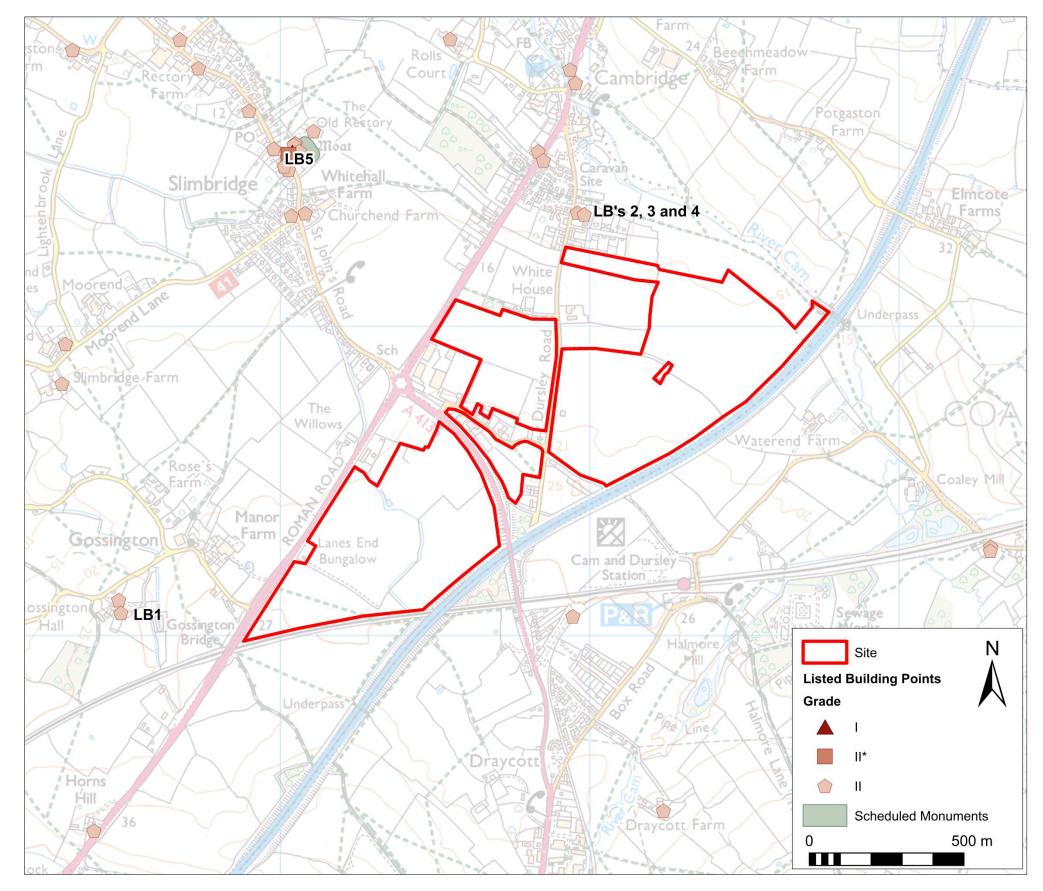


Figure 10 The setting of heritage assets

5. THE SETTING OF HERITAGE ASSETS

5.1. This section considers potential non-physical effects upon the significance of susceptible heritage assets within the Site environs. Non-physical effects are those that derive from changes to the setting of heritage assets as a result of new development. All heritage assets included within the settings assessment are summarised in the gazetteer in Appendix 2, and shown on Figure 10.

Step 1: Identification of heritage assets potentially affected

- 5.2. Step 1 of the Second Edition of Historic England's 2017 'Good Practice Advice in Planning: Note 3' (GPA3) is to 'identify which heritage assets and their settings are affected' (see Appendix 1). GPA3 notes that Step 1 should identify the heritage assets which are likely to be affected as a result of any change to their experience, as a result of the development proposal (GPA3, page 9).
- 5.3. There are a large number of designated heritage assets within the environs of the Site, as shown on Figure 10.
- 5.4. Despite the extent of the Site and the proximity of a large number of designated heritage assets, only a small number of heritage assets were identified (as part of Step 1) as potentially susceptible to impact as a result of changes to their setting relating to changes to the appearance and use of the Site. These assets have been identified using a combination of GIS analysis and field examination, which has considered, amongst other factors, the surrounding topographic and environmental conditions, built form, vegetation cover, and lines of sight, within the context of the assets' heritage significance. Those heritage assets identified as being potentially susceptible comprise:
 - The Grade II listed 'Gossington Hall' (Figure 10, LB1);
 - The Grade II listed 'Barn field Cottage', 'Bramley Cottage' and 'AVOCA'
 (Figure 10, LB2 LB4); and
 - The Grade I listed Church of St John the Evangelist (Figure 10, LB5).
- 5.5. However, during the Site visit and study area walkover it was established that, owing to a lack of perceivable historic associations and intervisibility, the Site did not form a part of the setting of any of the above heritage assets which contributes towards their significance. Thus, the proposed redevelopment of the Site would not have the

- capacity to alter their significance (positively or negatively) as a result of changes to their setting. As such, no heritage assets were progressed to Step 2 and beyond.
- 5.6. Gossington Hall likes c.450m west of the Site (Figure 10, LB1). Its principal elevation faces north-east, away from the Site. Formal gardens extend from the south-east facing elevation, an area previously occupied by plantation (as seen on Historic mapping). However, no clear views towards the Site were identified, and the Site does not contribute towards any significant views towards Gossington Hall (Figure 11) thus the Site is not considered to form part of any designed views from Gossington Hall, or its formal gardens, which might contribute towards its significance.



Figure 11 View of Gossington Hall, view from a footpath to the south-west of the Hall looking east towards the Site.

5.7. **LB1, LB2** and **LB3** form a terrace *c*.110m north-east of the Site (Figure 10). No historic associations have been identified between the dwellings and the Site and, despite their proximity, the intervening built form and dense mature planting between the Site and the listed buildings precludes any significant intervisibility (see Figure 12). Even in winter months, when the leaf cover is at its lowest, the Site would not form a significant part of their wider setting. As such, the Site does not contribute to

any designed views from any of the properties, nor does it feature in any significant views of the listed buildings. As such, the Site is notconsidered to form part of their setting which contributes towards their significance.



Figure 12 View of **LB2** to **LB4** from Dursley Road looking south-west towards the Site (specifically Parcel D)

5.8. The Grade I listed Church of St John the Evangelist lies c.700m north-west of the Site within the village of Slimbridge (Figure 10, 5). During the walkover survey, it was observed that glimpsed views of the upper spire are afforded across the local environs including within the Site. However, on visiting the Church itself, it was quickly apparent that the experience of the Church is very localised to within the village itself, with views beyond the settlement restricted by the built form of dwellings surrounding it. This enclosed setting gives an intimate quality to this highly aesthetic parish church and thus makes a positive contribution towards its significance. Whilst longer views across the fields from the north of the Church across footpaths and from Longaston Lane might include glimpses of rooflines of residential development within the Site, such views would not challenge the spire of the Church such that they would negatively impact its significance. The Site is not considered to form part of the setting of the Church of St John the Evangelist which contributes towards its significance.

5.9. At this stage, no further potentially susceptible heritage assets were identified which might be effected by residential development of a traditional residential scale within the Site. The Site is not situated within, or in close proximity to any conservation areas.

6. CONCLUSIONS

6.1. This assessment has included a review of a comprehensive range of available sources, in accordance with key industry guidance, in order to identify known and potential heritage assets located within the Site and its environs which may be affected by the proposed residential redevelopment of the Site. The significance of the identified known and potential heritage assets has been determined, as far as possible, on the basis of available evidence. The potential effects of the proposals on the significance of identified heritage assets, including any potential physical effects upon buried archaeological remains, and potential non-physical effects resulting from the anticipated changes to the settings of heritage assets, have been broadly assessed.

Potential physical effects

- 6.2. The Site has high potential for Romano-British settlement remains and possible remains of the Gloucester to Sea Mills Roman road. The Site has potential for medieval settlement remains, and more limited potential for Saxon settlement remains. The Site has some limited potential for Prehistoric remains, particularly later prehistoric deposits associated with the known settlement to the south of the Site.
- 6.3. The proposed residential redevelopment of the Site would likely result in the truncation and/or total removal of the anticipated archaeological resource within the Site. None of these remains are anticipated to be of such significance that they would preclude such redevelopment. However, a programme of archaeological evaluation works would be recommended in order to establish the nature and extent of the potential archaeological deposits, and establish their significance, in order to design a programme of archaeological works which could mitigate for the harm of their removal (through residential redevelopment of the Site, through preservation by record. It may also be possible, through heritage led design measures, to preserve some of the identified archaeological resource *in-situ*.
- 6.4. Hedgerows within the Site can be considered 'important' under the archaeology and history criteria of the Hedgerow Regulations 1997. 'Important' hedgerows do not comprise designated heritage assets; the Regulations are essentially a notification mechanism, and the local planning authority would need to authorise the removal of such hedgerows.

Anticipated non-physical effects

6.5. There are no design details for the proposed development. However, an assessment undertaken on the basis of the redevelopment of the Site for residential of a traditional scale found no harm to any designated heritage assets as a result of changes to their setting. As such, the Site has a high capacity for change in this regard.

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1883 Inclosure map of Slimbridge

Subsequent Ordnance Survey maps viewed at: www.promap.co.uk
http://www.envirocheck.co.uk/ and www.maps.nls.uk/geo/find/

Aerial photographs

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APPENDIX 1: HERITAGE STATUTE POLICY & GUIDANCE

Heritage Statute: Scheduled Monuments

Scheduled Monuments are subject to the provisions of the Ancient Monuments and Archaeological Areas Act 1979. The Act sets out the controls of works affecting Scheduled Monuments and other related matters. Contrary to the requirements of the Planning Act 1990 regarding Listed buildings, the 1979 Act does not include provision for the 'setting' of Scheduled Monuments.

National heritage policy: the National Planning Policy Framework Heritage assets and heritage significance

Heritage assets comprise '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' (the NPPF (2019), Annex 2). Designated heritage assets include World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields and Conservation Areas (designated under the relevant legislation; NPPF (2019), Annex 2). The NPPF (2019), Annex 2, states that the significance of a heritage asset may be archaeological, architectural, artistic or historic. Historic England's 'Conservation Principles' looks at significance as a series of 'values' which include 'evidential'. 'historical', 'aesthetic' and 'communal'.

The setting of heritage assets

The 'setting' of a heritage asset comprises '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' (NPPF (2019), Annex 2). Thus it is important to note that 'setting' is not a heritage asset: it may contribute to the value of a heritage asset.

Guidance on assessing the effects of change upon the setting and significance of heritage assets is provided in 'Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets', which has been utilised for the present assessment (see below).

Levels of information to support planning applications

<u>Paragraph 189</u> of the NPPF (2019) identifies 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'.

Designated heritage assets

<u>Paragraph 184</u> of the NPPF (2019) explains that heritage assets 'are an irreplaceable resource and should be conserved in a manner appropriate to their significance'. <u>Paragraph 193</u> notes 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'. <u>Paragraph 194</u> goes on to note that 'substantial harm to or loss of a grade II listed building...should be exceptional and substantial harm to or loss of designated heritage 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'.

<u>Paragraph 196</u> clarifies 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'.

Stroud District Local Plan

Those policies relevant to heritage and the promotion of the land within the Local Plan are reproduced below. Only relevant sections of applicable policy are reproduced.

Core Policy CP4 - Place Making

All development proposals shall accord with the Mini-Visions and have regard to the Guiding Principles of that locality, as set out in this Plan and shall be informed by other relevant documents, such as any design statements adopted as Supplementary Planning Documents. Proposals will be expected to:

2. Place shape and protect or enhance a sense of place; (create a place with a locally-inspired or distinctive character – whether historic, traditional or contemporary – using appropriate materials, textures and colours, locally-distinctive architectural styles, working with the site topography, orientation and landscape features; as well as protecting or enhancing local biodiversity, the historic environment and any heritage assets)

Core Policy CP14 – High Quality Sustainable Development

High Quality development, which protects, conserves and enhances the built and natural environment, will be supported. Development will be supported where is achieves the following:

5. An appropriate design and appearance, which is respectful of the surroundings, including the local topography, built environment and heritage.

Core Policy CP15 – A Quality Living and Working Countryside

In order to protect the separate identity of settlements and the quality of the countryside (including its built and natural heritage), proposals outside identified settlement development limited will not be permitted except where these principles are complied with:

4. It is demonstrated that the proposal is enabling development, required in order to maintain a heritage asset of acknowledged importance.

Where development accords with [in relation to heritage, the above statement] it will only be permitted in the countryside if:

i) It does not have an adverse impact on heritage assets and their setting.

Delivery Policy ES10 – Valuing our historic environment and assets

Stroud Districts historic environment will be preserved, protected or enhanced, in accordance with the principles set out below:

- 1. Any proposals involving a historic asset shall require a description of the heritage asset significance including any contribution made by its setting and an assessment of the potential impact of the proposal on that significance, using appropriate expertise. This can be a desk-based assessment and a field evaluation prior to determination where necessary and should include the Gloucestershire Historic Environment Record.
- 2. Proposals and initiatives will be supported which conserve and, where appropriate, enhance the heritage significance and setting of the Districts heritage assets, especially those elements which contribute to the distinct identity of the District.

These include:

- A. the 68 sites of national archaeological importance (which are designated as Ancient Monuments), any undesignated archaeology of national significance, and the many buildings that are Listed as having special architectural or historic interest
- B. the stone, bronze, iron age and roman settlements and remains; the medieval settlements including Berkeley Castle; historic houses; historic parks; gardens and villages
- C. the townscapes of the larger towns such as Stroud where the industrial heritage influenced its historic grain, including its street layouts and plot sizes
- D. the District's historic market towns and villages, many with designated conservation areas, such as Berkeley, Wotton Under Edge, Minchinhampton, Painswick and Dursley.
- 3. Proposals will be supported which protect and, where appropriate, enhance the heritage significance and setting of locally identified heritage assets, such as buildings of local architectural or historic interest, locally important archaeological sites and parks and gardens of local interest.
- 4. Proposals will be supported which protect and, where appropriate, enhance key views and vistas, especially of the spires and towers of historic churches and mills.
- 5. Any harm or loss would require clear and convincing justification to the relevant decision-maker as to why the heritage interest should be overridden. A full programme of work shall be submitted with the application, together with proposals to mitigate any adverse impact of the proposed development, and where appropriate, be implemented through measures secured by planning condition(s) or through a legal agreement.

Good Practice Advice 1-3

Historic England has issued three Good Practice Advice notes ('GPA1-3') which support the NPPF. The GPAs note that they do not constitute a statement of Government policy, nor do they seek to prescribe a single methodology: their purpose is to assist local authorities, planners, heritage consultants, and other stakeholders in the implementation of policy set out in the NPPF. This report has been produced in the context of this advice, particularly 'GPA2 – Managing Significance in Decision-Taking in the Historic Environment' and 'GPA3 – The Setting of Heritage Assets'.

GPA2 - Managing Significance in Decision-Taking in the Historic Environment

GPA2 sets out the requirement for assessing 'heritage significance' as part of the application process. Paragraph 8 notes 'understanding the nature of the significance is important to understanding the need for and best means of conservation.' This includes assessing the extent and level of significance, including the contribution made by its 'setting' (see GPA3 below). GPA2 notes that 'a desk-based assessment will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area, and the impact of the proposed development on the significance of the historic environment, or will identify the need for further evaluation to do so' (Page 3).

GPA3 – The Setting of Heritage Assets

The NPPF (Annex 2: Glossary) defines the setting of a heritage asset as 'the surroundings in which a heritage asset is experienced...'. Step 1 of the settings assessment requires heritage assets which may be affected by development to be identified. Historic England notes that for the purposes of Step 1 this process will comprise heritage assets 'where that experience is capable of being affected by a proposed development (in any way)...'.

Step 2 of the settings process 'assess[es] the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated', with regard to its physical surrounds; relationship with its surroundings and patterns of use; experiential effects such as noises or smells; and the way views allow the significance of the asset to be appreciated. Step 3 requires 'assessing the effect of the proposed development on the significance of the asset(s)' – specifically to 'assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it', with regard to the location and siting of the development, its form and appearance, its permanence, and wider effects.

Step 4 of GPA3 provides commentary on 'ways to maximise enhancement and avoid or minimise harm'. It notes (Paragraph 37) that 'Maximum advantage can be secured if any effects on the significance of a heritage asset arising from development liable to affect its setting are considered from the project's inception.' It goes on to note (Paragraph 39) that 'good design may reduce or remove the harm, or provide enhancement'.

Heritage significance

Discussion of heritage significance within this assessment report makes reference to several key documents. With regard to Listed buildings and Conservation Areas it primarily

discusses 'architectural and historic interest', which comprises the special interest for which they are designated.

The NPPF provides a definition of 'significance' for heritage policy (Annex 2). This states that heritage significance comprises 'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be <u>archaeological</u>, <u>architectural</u>, <u>artistic</u> or <u>historic'</u>. This also clarifies that for World Heritage Sites 'the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance'.

Regarding 'levels' of significance the NPPF (2019) provides a distinction between: designated heritage assets of the highest significance; designated heritage assets not of the highest significance; and non-designated heritage assets.

Historic England's 'Conservation Principles' expresses 'heritage significance' as comprising a combination of one or more of: evidential value; historical value; aesthetic value; and communal value:

- Evidential value the elements of a historic asset that can provide evidence about past human activity, including physical remains, historic fabric, documentary/pictorial records. This evidence can provide information on the origin of the asset, what it was used for, and how it changed over time.
- Historical value (illustrative) how a historic asset may illustrate its past life, including changing uses of the asset over time.
- Historical value (associative) how a historic asset may be associated with a notable family, person, event, or moment, including changing uses of the asset over time.
- Aesthetic value the way in which people draw sensory and intellectual stimulation from a historic asset. This may include its form, external appearance, and its setting, and may change over time.
- Communal value the meaning of a historic asset to the people who relate
 to it. This may be a collective experience, or a memory, and can be
 commemorative or symbolic to individuals or groups, such as memorable
 events, attitudes, and periods of history. This includes social values, which
 relates to the role of the historic asset as a place of social interactive,
 distinctiveness, coherence, economic, or spiritual / religious value.

Effects upon heritage assets

Heritage benefit

The NPPF clarifies that change in the setting of heritage assets may lead to heritage benefit. Paragraph 200 of the NPPF (2019) notes that 'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably'.

GPA3 notes that 'good design may reduce or remove the harm, or provide enhancement' (Paragraph 28). Historic England's 'Conservation Principles' states that 'Change to a significant place is inevitable, if only as a result of the passage of time, but can be neutral or beneficial in its effects on heritage values. It is only harmful if (and to the extent that) significance is reduced' (Paragraph 84).

Specific heritage benefits may be presented through activities such as repair or restoration, as set out in Conservation Principles.

Heritage harm to designated heritage assets

The NPPF (2019) does not define what constitutes 'substantial harm'. The High Court of Justice does provide a definition of this level of harm, as set out by Mr Justice Jay in *Bedford Borough Council v SoS for CLG and Nuon UK Ltd.* Paragraph 25 clarifies that, with regard to 'substantial harm': '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 or very much reduced'.

Effects upon non-designated heritage assets

The NPPF (2019) paragraph 197 guides 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 affect directly or indirectly non designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.

APPENDIX 2: GAZETTEER OF SELECTED RECORDED HERITAGE ASSETS

Ref	Description	Grade/Period	NGR	HE ref. HER ref. HEA ref.
LB1	Gossinton Hall	Grade II	373484 202074	1340546
LB2	Barnfield Cottage	Grade II	374960 203369	1090895
LB3	Bramley Cottage	Grade II	374960 203369	1090895
LB4	AVOCA	Grade II	374982 203363	1251442
LB5	Church of St John the Evangelist	Grade I	374038 203564	1305799
1	A geophysical survey undertaken in 1998 over the moated platform. No 'features' were recorded which is interpreted to indicate that the building was demolished and thus a continuous rubble spread should thus be anticipated.	Scheduled monument/Medieval	374100 203560	1015688 47860 47861 1340169 5259
2	Two late Neolithic pits (possibly associated with settlement).	Prehistoric	374400 201100	5262 6332 <i>0</i> 9
3	An undated ring ditch visible as a cropmark recorded by the HER.	Prehistoric?	375231 202367	20389
4	Two possible conjoined ring ditches recorded as cropmarks by the HER.	Prehistoric? Romano-British?	374199 202602	20395
5	In 2014 geophysical survey followed by a 78 trench evaluation was undertaken which recorded a small charcoal filled feature of late-Mesolithic to early-Neolithic date as well as ridge and furrow.	Prehistoric	375045 204462	47449 47624 1593562 1624948

Ref	Description	Grade/Period	NGR	HE ref. HER ref. HEA ref.
6	In 2011 desk-based assessment and geophysical survey were followed by excavation of eight evaluation trenches which recorded ridge and furrow cultivation as well as 'discrete features' including a pit and post hole of unknown date which may be associated with the adjacent prehistoric and Romano-British features which were found later. Two flakes of 'fresh' debitage were also recorded. 12th to 19th-century pottery sherds were found in furrows and thus likely represent manuring scatter.	Undated	374948 201750	39017 41312 41313 41314 41315 39018 41316
7	A series of metal detecting rallies which have recorded a foci of Romano-British finds indicative of a significant Romano-British settlement.	Prehistoric, Roman, Post-Medieval	373980 203870	49575
8	Evaluation undertaken in 2016 recorded evidence for later prehistoric activity, possibly relating to settlement, with finds providing a late Iron Age/early Roman date.	Prehistoric Romano-British	375184 201450	48694 48088 48697
9	Archaeological evaluation in 2002 recorded two features comprising a shallow medieval furrow and undated ditch. Two deposits were also recorded, one containing prehistoric pottery and one containing Romano-British pottery. Residual flint flakes were also recorded. The features were truncated by ridge and furrow.	Prehistoric Roman Medieval	374900 201200	1435635 1530848 1435635 21351
10	Site of a possible Roman camp, including scattered linear and curvilinear ditches of unknown date and function mapped by the NMP.	Roman	374100 202350	17989 48819
11	Possible settlement remains identified by the NMP.	Roman?	375058 202705	16675
12	Possible enclosures and an associated trackway identified by the NMP.	Undated	374850 202920	20390
13	Cropmarks of trackways and an enclosure of uncertain date identified by the NMP.	Undated	374094 202554	16676
14	Gloucester to Sea Mills Roman road.	Roman	374121 202394	7365
15	Watching brief on the Severn Trench Leathern Bottle Main undertaken in 1978. Sherds of medieval and possible Roman pottery were recorded.	Roman? Medieval	377432 206804	20828

Ref	Description	Grade/Period	NGR	HE ref. HER ref. HEA ref.
16	Romano-British and medieval features were recorded during a three trench evaluation in 2010. The subsequent watching brief in 2013 observed a Roman and medieval ditches and cess or rubbish pit of Roman date. A post-medieval wooden culvert was also recorded. Boundary ditches, two furrows/drainage ditches and a pit/ditch terminal were also recorded.	Roman Medieval	379392 203579	35581 35753 45517 35752 35751 1604992
17	In 1999 an archaeological evaluation was undertaken which recorded Romano-British features indicative of 3rd-4th century settlement. Evidence for a possible Saxon settlement was also recorded, with dating provided by 5th-century pottery.	Roman Saxon	374050 203660	20591 41887 1341312
18	A possible DMV recorded east of Elmcote Farm. Concentrations of Roman pottery have been recorded at Elmcote Farm. Some medieval pottery also recorded; surface material likely associated with manuring and disturbance from the DMV. A Roman stone mortar was unearthed by a contractor working at Coaley.	Roman Medieval?	376000 202900	5954 5220 5222 5217
19	Cropmarks indicative of a DMV. Site of an offshoot of Berkeley Nunnery and possibly a grange.	Medieval	373700 202100	5264
20	Five pits at Waterend Farm which contained 13th-century pottery and burnt bone adjoining an area of rammed stone.	Medieval	375600 202700	633740
21	Cropmarks indicative of settlement, ridge and furrow and a post-medieval enclosure cutting the ridge and furrow.	Medieval and post- medieval	374280 203640	5261
N/A	Group VII stone axe findspot	Prehistoric	374700 202500	6860

APPENDIX 3: HISTORIC ORDNANCE SURVEY MAPPING



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