

6 Planning Assessment

land in Long Ashton that offers the opportunity for a more sustainable development than the application site.

- 6.29 The application site immediately adjoins the existing built-up area of Long Ashton and has good pedestrian and cycle connectivity to the range of services and facilities available within the centre of the village. There is a continuous footway from the site to the centre of the village, with retail and related facilities within an approximately 10 minute walk.
- 6.30 National Cycle Route 33, the Festival Way, runs along Weston Road on the site frontage, providing largely traffic free routes to Bristol to the east and to the west, Nailsea with its mainline railway station. The site is also on a key bus corridor providing services to Bristol city centre. In addition, the cycle route passes close to Long Ashton Park and Ride, enabling easy cycle access to this facility and an alternative direct transport route to central Bristol.
- 6.31 It is clear therefore that the site is in a sustainable location and further details are set out in the Transport Assessment submitted in support of the application.
- 6.32 Figure 6.2, as referred to above, identifies the sites that have come forward around Long Ashton in the 2020 call for sites exercise. It is clear that none of these provides the basis for a more sustainable form of development compared to the application site. (See Call for Sites section below).

Sensitive Locations

- 6.33 Whilst Policy CS17 does not define sensitive locations, other than the Green Belt designation addressed

above, the reasons for refusal of the previous planning application identify only one issue of sensitivity in respect of the application site and that is the Scheduled Monument (SM) designation. This issue is considered below.

- 6.34 All land adjoining the built-up area of the village is designated as Green Belt. In addition to this, most of it is heavily constrained by other designations and physical factors, as shown on drawing DR A 1010 Rev1 at Figure 6.1. The decision report on the previous application comments that this drawing fails to identify the SM designation on the application site as a constraint. This is because the drawing is part of the assessment of alternative sites. In the previous planning application there was a separate assessment of the application site and this is the case for the current application too.
- 6.35 To the west, south west and north west a large area is subject to a Neighbourhood Plan designation as an Area of Separation, signifying an especially important Green Belt role for this land, that Neighbourhood Plan Policy ENV1 seeks to keep open to fulfil the NPPF policy purpose of checking urban sprawl and preventing neighbouring settlements from merging. Some is also within conservation areas where the landscape setting makes an important contribution to character and appearance, and some is within Flood Zone 2 where development should be avoided if possible.
- 6.36 To the south much of the land adjoining the built-up area does not have suitable access and a large proportion is severed from the village by the mainline railway. To

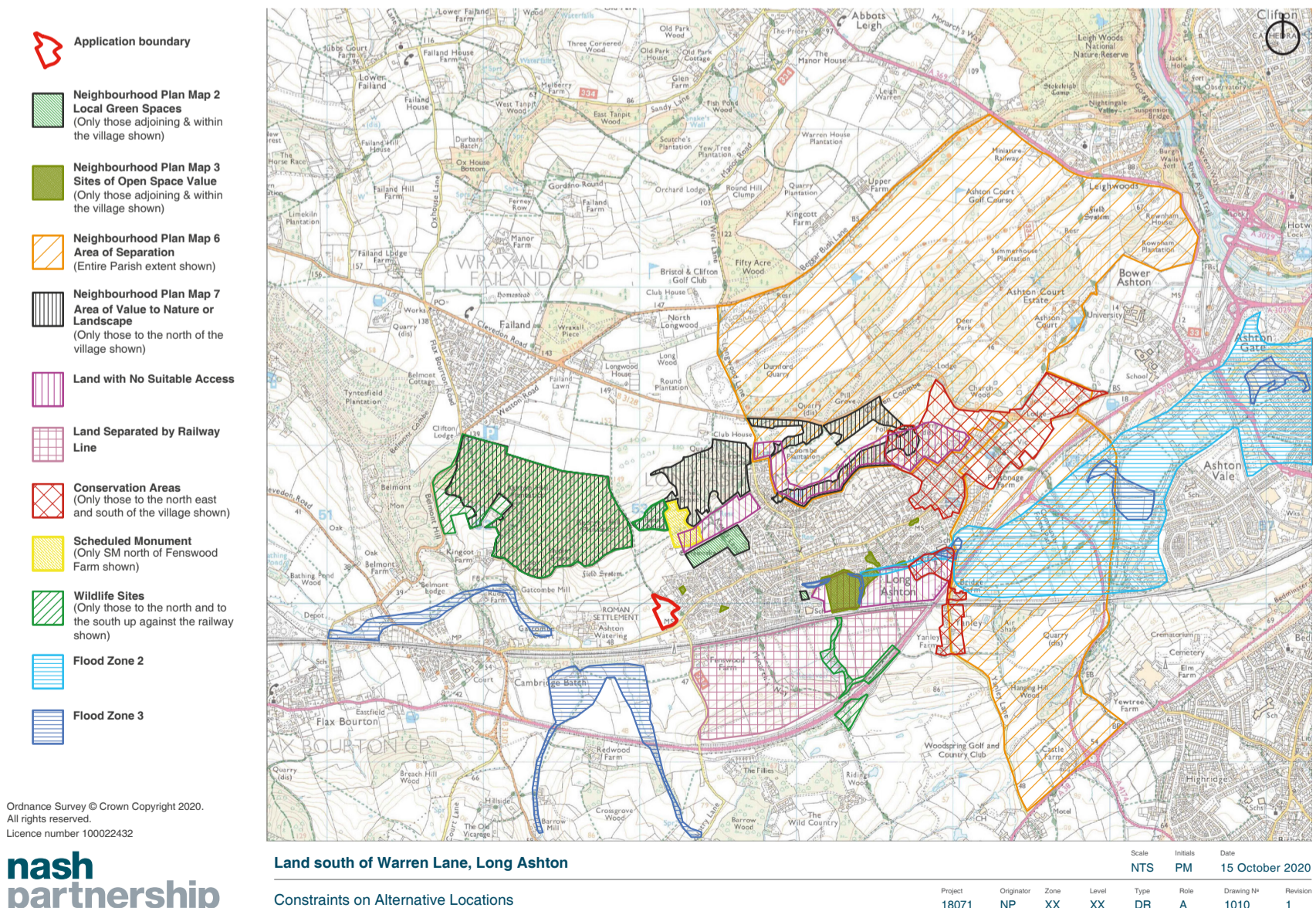


Figure 6.1: Constraints on Alternative Locations

Land South of Warren Lane, Long Ashton

the north much of the land here also does not have suitable access and the majority is identified as an Area of Value to Nature or Landscape. Three areas adjacent to the built-up area of Long Ashton are not shown on the drawing as constrained.

- 6.37 One of these is south of Weston Road opposite the application site. Part of this accommodates a large house and has substantial mature tree cover. West of this the land also has substantial tree cover and has lawful mixed use for agriculture/horticulture and a builders' yard. A Permission in Principle application on the land for 2-5 dwellings was refused in May 2020 but allowed on appeal in February 2021. The scale of development in relation to the identified level of need is small and there is no indication that this site will provide any affordable housing.
- 6.38 The second area is open land to the north of Kings Croft. However, development on this land would extend the village further up the northern slopes and impact on this key characteristic of its landscape setting. This land has not been put forward through the published call for sites process and is not considered an available option for rural exception affordable housing development.
- 6.39 The third is land on the south side of Weston Road where development would stretch the built up area of the village significantly beyond its current extent and it is considered

that this would result in an unacceptable form of 'ribbon' development.

Call for Sites

- 6.40 In addition to these sites, as described above, an interim report has been published on the recent call for sites exercise (SHLAA:IR). This report identifies the sites that have been put forward as possible future housing sites around the existing built-up area of Long Ashton and provides a good basis for considering the potential availability of sites to provide affordable housing in appropriate locations (see Figure 6.2).
- 6.41 To provide possible options for responding to the high level of affordable housing need that exists now and which will, over the next 5 years require between 45 and 56 new affordable homes annually, sites need to be sustainable, deliverable and acceptable in terms of environmental sensitivity.
- 6.42 The sites that have come forward are listed in the Table at figure 6.3 below with the reference number corresponding to those shown in Figure 6.2. The table provides a high-level assessment of the sites against a number of criteria:
 - **Scale** – is the site of a scale that makes it appropriate for rural exception affordable housing to serve Long Ashton?
 - **Location** – does the location facilitate development that is sustainable in spatial terms in relation to Long

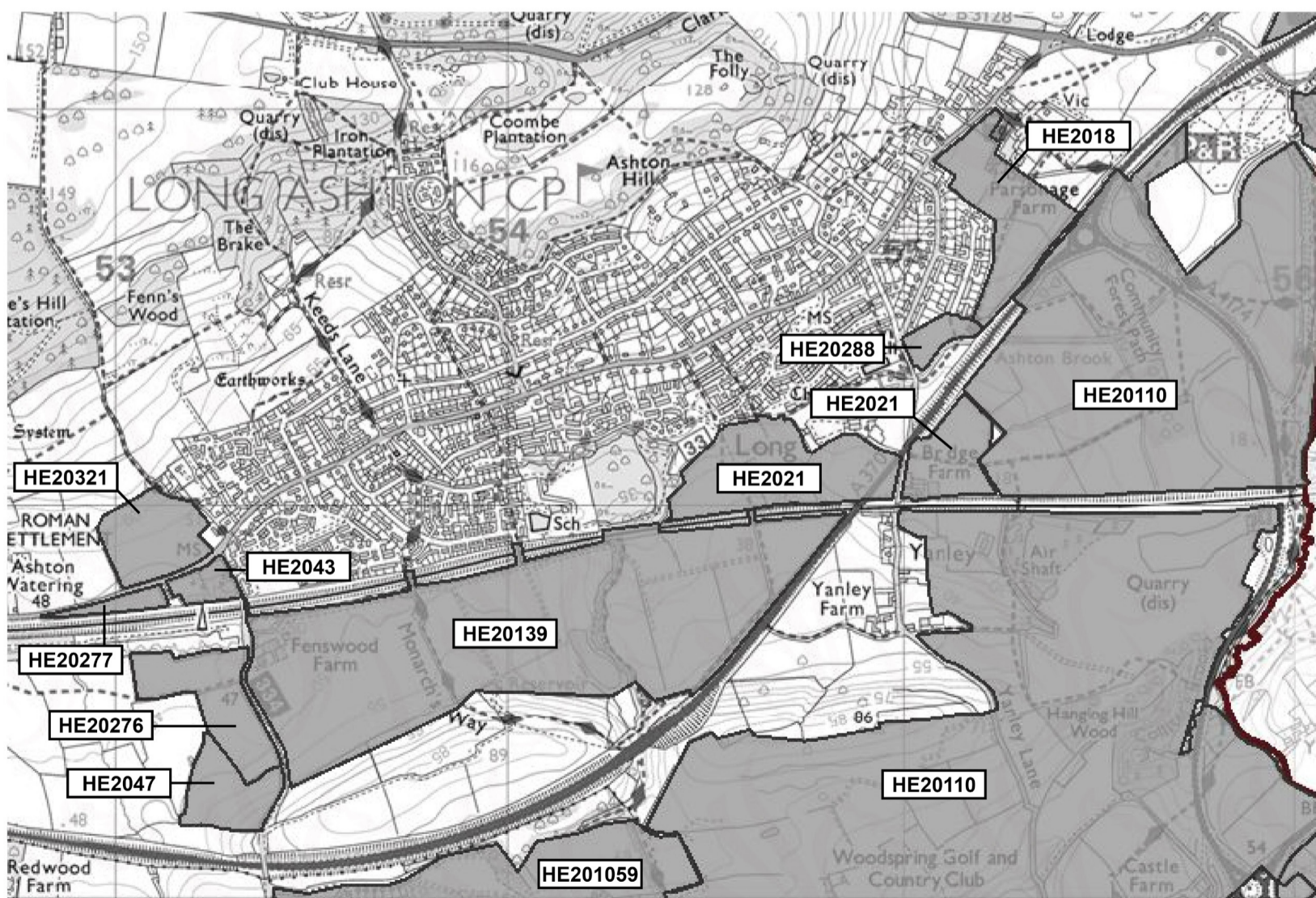


Figure 6.2: 2020 Call For Sites Land Parcels

6 Planning Assessment

Ashton, with good potential for safe and convenient pedestrian connections to local services and facilities?

- **Access** – is it evident that adequate access to the local highway network is available?
- **Area of Separation** - does the site location preserve or intrude into the Area of Separation between Long Ashton and Bristol designated in the Neighbourhood Plan?
- **Flood Risk** – is the site in an area of identified flood risk?
- **Conservation Area/Townscape** – is the site in a conservation area with potential to adversely affect its character and appearance and/or would its location or configuration result in negative impacts on townscape and the form of Long Ashton?

- 6.43 This assessment is limited to the purpose of assessing the potential for alternative rural exception sites to meet affordable housing need in Long Ashton. It is not a comprehensive assessment of the suitability of the sites for meeting future general housing growth requirements.
- 6.44 It can be seen from the Table at figure 6.3 that a number of the sites are large strategic land promotions that do not constitute rural exception sites. Their scale and complexity also suggests that, assuming development could proceed, they would not provide any affordable housing to meet the identified needs within the next 2-5 years.
- 6.45 These large areas of land are also detached from the established built-up area of Long Ashton, with the mainline railway and, for some of the land, the A370 Long Ashton Bypass creating barriers to integration. One area, HE20139, is adjacent to two pedestrian cycle

bridges across the railway although for a site of this scale significant improvement to these routes would be needed.

- 6.46 For two of the sites there does not appear to be scope for adequate vehicular access. For others access to main roads of a good standard is in principle available although there will be important considerations in respect of capacity and the free flow of traffic.
- 6.47 Four of the sites are either partly or wholly within the Area of Separation and development within them will reduce the sense of separation of Long Ashton from Bristol.
- 6.48 Some of the land is within Long Ashton conservation area which has an open, pastoral character in the area around All Saints Church. Whilst good quality design can help mitigate heritage impacts, development of any significant scale would inevitably cause an adverse impact on the character and appearance of the conservation area.
- 6.49 Beyond the western end of the village the land at HE20277 would, by virtue of its location and configuration, result in a form of ribbon development that would significantly harm the western approach to Long Ashton and the open views to the south.
- 6.50 Five of the sites sit either wholly or partly within flood zone 2. Detailed investigation and design may be able to mitigate this but planning policy requires that development avoids areas of flood risk if this is possible.
- 6.51 With the exception of HE2043, all of the sites are assessed as having one of more red negative attributes. These are not things that appear capable of mitigation but are fixed features such as scale and location.
- 6.52 Site HE2043 is not assessed as red negative under any of the headings. However, it is a site of very limited capacity with an existing Permission in Principle for 2-5 dwellings. There is no suggestion that the site will provide affordable housing and it does not have the capacity to contribute significantly to meeting the identified need.

Ref	Area Ha	Rural Exception in Scale	Sustainable Location	Access	Impact on Area of Separation	Flood Risk	Conservation Area/Townscape	Comments
HE 20277	4.86	Green	Orange	Green	Green	Green	Red	Well beyond the established limits of the village – would create ribbon development and obscure views to the south.
HE2043	1.4	Green	Green	Green	Green	Green	Green	Permission in Principle for 2-5 dwellings – no indication of any affordable housing.
HE20276	5.85	Green	Red	Green	Green	Green	Green	South of railway, detached from built-up area.
HE2047	3.82	Green	Red	Green	Green	Green	Green	South of railway, detached from built-up area.
HE20139	50.27	Red	Orange	Green	Green	Green	Green	Large strategic site to the south of the railway.
HE2021	13.93	Orange	Red	Red	Orange	Orange	Green	Yanley Lane is very narrow and doesn't appear suitable for access. Not conducive to safe and convenient pedestrian links.
HE201059	75.43	Red	Red	Green	Red	Orange	Green	Large strategic site to the south of both the railway and bypass and distant from the built-up area of Long Ashton.
HE20110	290.36	Red	Red	Green	Red	Orange	Green	Large strategic site to the south of both the railway and bypass and distant from the built-up area of Long Ashton.
HE20288	1.36	Green	Orange	Red	Red	Orange	Green	Open land at a narrow point in the area of green belt separating Long Ashton from Bristol. Yanley Lane is very narrow on the site frontage and effectively narrowed by on-street parking to the north. A safe pedestrian route to the centre would be circuitous.
HE2018	7.33	Green	Orange	Green	Red	Orange	Orange	Open land in conservation area and at a narrow point in the area of green belt separating Long Ashton from Bristol.
Application Site	2.22	Green	Green	Green	Green	Green	Orange	Sustainable location immediately adjoining the built-up area, with good non-car access to services and facilities. Within a Scheduled Monument designation – see assessment below.

Figure 6.3: Suitability of 2020 Call For Sites Land Parcels for Rural Exception Development

Land South of Warren Lane, Long Ashton

6.53 The application site is also shown in the Table at figure 6.3. Whilst it sits within a wider area that is discounted within the SHLAA:IR, this is based on it being within the boundary of a Scheduled Monument. This conclusion is not accepted for the reasons set out below and the site is therefore shown with an amber rating against the Conservation/Townscape Impact criteria in the table. Against all other criteria it is rated green.

Other Policy Requirements

6.54 In addition to the above, Policy CS17 also requires that the scale of development is appropriate to the location and that the affordable housing is secured in perpetuity. These requirements are not cited in the reason for refusal. However, the decision report concludes that the scale of development is not appropriate to the location because the development comprises inappropriate development in the Green Belt and will cause harm to the SM. However, it is considered that the current application is a rural exception affordable housing proposal that is appropriate development in the Green Belt and that harm to the SM is outweighed by public benefit as set out above and below.

6.55 It is therefore necessary to consider the scale of development in relation to its context. In this respect, the 2011 Census shows that at that time there were 3,197 households within the Wraxall and Long Ashton ward. Most, but not all of these households were in Long Ashton and assuming a broad proxy of 2,500 dwellings in Long Ashton, the application proposal would represent a 1.4% increase.

6.56 The site sits immediately adjoining the western edge of Long Ashton, with new residential development recently approved to the south and the east. As illustrated in Figures 5.1 and 5.2 of the Planning, Design and Access Statement submitted with this application, a development of 35 affordable homes would sit comfortably in this context as a modest organic growth of the village, rounding off what would otherwise be a protruding element of new development permitted to the south of the application site.

6.57 The proposed affordable housing can be secured in perpetuity through a S106 Agreement.

Conclusions

6.58 Contrary to the findings of the decision report on the previous planning application, the application site has been subject to a sequential approach. There are no sequentially preferable sites for the provision of rural exception affordable housing to meet current and pressing local needs.

6.59 The decision report on the previous planning application states that housing needs identified through the Home Choice Register could be met on one or more smaller sites. However, as described above, the Home Choice Register is not a full representation of the extent of affordable housing need in Long Ashton and there is no evidence that smaller sites are available for development

of affordable housing. The evidence from development on smaller sites over recent years is that none have provided affordable housing. It is also the case that development of smaller sites alone would not begin to address the level of identified need in any significant way.

6.60 The application site is however, well placed to deliver an important contribution to the supply of affordable housing at a highly sustainable location, through modest organic growth of the established built up area of Long Ashton. It does raise the issue of development within the boundary of a Scheduled Monument and this is considered below.

Reason for Refusal 2

6.61 The second reason for refusal of the previous planning application was:

6.62 *The proposed development, by reason of its location on a Scheduled Ancient Monument (SAM), would require the complete removal of all archaeological remains from the development site. These remains form the main significance of the designation of this part of the historical asset. This would cause unacceptable harm to the SAM. In addition, the development of part of the historic field pattern associated with the SAM would cause unacceptable harm to the historic landscape. The proposed development is therefore contrary to Policy CS5 of the Core Strategy, Policy DM6 of the North Somerset Sites and Development Plan, and paragraphs 190, 193-196 and 199 of the National Planning Policy Framework.*

6.63 This reason for refusal comprises of two elements:

- That development requires complete removal of all archaeological remains, causing unacceptable harm
- Development of part of the historic field pattern causing unacceptable harm.

6.64 These two elements are each considered in turn below.

Removal of Archaeological Remains

6.65 The key consideration is whether the application site is likely to contain archaeological evidence of high value. In this respect the decision report on the previous planning application places reliance on comments from the Council's Archaeologist that the significance of the archaeological evidence identified in trial trench field evaluation, undertaken by Cotswold Archaeology on behalf of the applicant, led to the decision to extend the Scheduled Monument (SM) in 2014.

6.66 However, the Historic England advice report recommending the extension of the SM does not relate to just the current application site but to a wider area of land. It also does not provide any clear analysis or additional evidence to support a contention that the archaeological trench investigation provides evidence of below ground remains of high significance. It records that identified features remain undated and uncharacterised, that the results are inconclusive regarding the extent of archaeological survival and that almost no evidence was found of use of the land after the second century AD at the latest.

6 Planning Assessment

- 6.67 The report notes Brougham as a parallel case for the principle of extending the area around a Roman settlement. However, this comparison compounds the problem of a lack of analysis and evidence because in that example the extension of the SM was into areas where, in contrast to the results for the land south of Warren Lane, evidence indicated that the best remains were in the un-scheduled area. Without any further substantiation the advice report, in respect of the extension of the Long Ashton SM to incorporate land including the application site, suggests that, on the basis of probability, there are strong claims for considering there to be high archaeological potential.
- 6.68 As noted above, the Historic England report on extending the SM boundary applied to a larger area of land than the current application site. In this connection the following conclusion from the Historic England letter of 22 July 2016 (see Appendix 1) is highly relevant:
- 6.69 *The proposal within the eastern half of the field from the evidence, so far gathered, will not have a major impact on the significance of the monument. If the site is developed then this will require the excavation of the area to record the archaeology prior to its removal. The detail of this would be discussed as part of a planning and scheduled monument consent application.*
- 6.70 There has been no material change in policy or evidence since this time to justify modification of this position.
- 6.71 A Historic Environment Desk-Based Assessment by Cotswold Archaeology (July 2021) is submitted in support of the current outline planning application. This sets out a summary of the extensive archaeological investigations that have been undertaken. It notes that not every aspect of a scheduled heritage asset will contribute equally to its significance and, that from the archaeological investigation of the site, the only feature apparently related to the Scheduled Monument is a single ditch from which a few sherds of broadly Roman period pottery were recorded.
- 6.72 The Assessment concludes (4.6) that given that the site and a parcel of land immediately adjacent, have been subject to archaeological investigation with only limited positive results, there is considered to be a low potential for any unknown archaeological remains of high significance to survive buried within the site. It is anticipated that no archaeological remains of high significance will therefore be truncated by the proposed development.
- 6.73 As a result, the Assessment concludes (6.7) that harm to the SM would be less than substantial harm, which could be mitigated through an appropriate and proportionate programme of archaeological mitigation and recording to be agreed with Historic England and North Somerset Council.
- 6.74 It is therefore that applicant's firm opinion that the likelihood of archaeological remains of high value being present within the application site is low. It should also be noted that the indicative development proposal has a reduced footprint compared to the previous planning application, leaving approximately 40% of the site as open space, habitat and orchard. The inclusion of private gardens increases this to approximately 55% of the site area which will be largely undisturbed and therefore will not impact on any below ground remains.
- ### Development of part of the Historic Field Pattern
- 6.75 The Assessment by Cotswold Archaeology considers the role of the site in the setting of the SM and the impact of the proposed development on this.
- 6.76 Whilst the Site falls within the designated SM area, it is noted in the Assessment (5.10) that its extent relates to modern field boundaries and that the application site lies outside of the core Settlement itself, hence its inclusion within the setting assessment. The significance of the SM primarily derives from its evidential (archaeological remains) and historic (illustrative) values embodied by the subsurface physical remains which are preserved in situ as tangible evidence of occupation, settlement patterns and socio-economical activities and conditions during the Roman period within the locality (5.11). The remains are principally concentrated some distance to the west at the site of the modern day Gatcombe Farm.
- 6.77 The Assessment considers (5.21) that the site makes a small positive contribution towards the significance of the SM and that whilst the development proposal will introduce built form within what is now an agricultural field this will not influence or change the way in which the remains of the Roman Settlement covered by the SM are perceived, its purpose or its landscape connections. Also, no views of the Settlement will be blocked by the proposal.
- 6.78 The Assessment concludes that the development would result in less than substantial harm (lower end) to the significance of the SM and that based on current information would not constitute an unacceptable development as defined by planning guidance or local planning policies. In particular, the effect of the proposed development would be below the level of 'substantial harm' as defined by the NPPF.
- ### Conclusions on the Scheduled Monument
- 6.79 The central issue in relation to heritage assets is the extent to which the application proposal will impact on the significance of the SM and whether any harm is outweighed by public benefit.
- 6.80 Reason for refusal 2 sets out the local planning authority's position on impact on the SM in respect of the previous application. As the current application is fundamentally the same as the previous one, although with a reduced development footprint and more of the site remaining open, it is reasonable to view this reason as defining the planning issue in respect of heritage assets.
- 6.81 Reason for refusal reason 2 states that the proposed development would cause unacceptable harm to the SM by removing all archaeological remains and by developing part of the historic field pattern. Pivotal to the reasoning for this conclusion is the contention set out in the decision report that the trial trench field evaluation led to extension

Land South of Warren Lane, Long Ashton

of the SM boundary and cannot logically be used to demonstrate that the site is not of significance.

- 6.82 However, it is not the applicant's view that the site is of no significance but that, based on the evidence and its thorough evaluation by Cotswold Archaeology, the level of heritage significance varies across the extent of the SM and that within the application site it is unlikely that archaeological remains of high value are present.
- 6.83 A SM designation does not of course preclude development. This is evident within this SM where there have been a number of planning permissions within areas of highest heritage significance. Planning application 17/P/2250/F for example was granted permission for conversion of agricultural buildings to residential buildings. Historic England in its comments on the application stated:
- 6.84 *'The area proposed for development was extensively excavated between 1967 and 1977. This was prior to the construction of the current agricultural buildings. This means that in the area of the current buildings most of the archaeology has been removed and recorded. Outside of the footprint of these buildings however there is the potential for undisturbed archaeology.'*
- 6.85 The comments go on to state:
- 6.86 *'The proposed alteration of the farm buildings at Gatcombe Farm will alter the character of the site from that of an agricultural complex to a more urban environment. At present the modern farm buildings are relatively transient in design and construction. The proposed alteration will change this; creating buildings with more permanence and solidity in form and function. The introduction of associated infrastructure such as parking, access roads, recreational space and refuse requirements will all have the potential to impact on the overall character and aesthetics of the site and its setting.'*
- 6.87 In the summary to their advice Historic England conclude:
- 6.88 *The application has limited information about the ancillary works that will be needed for the conversions; landscaping, services, etc. These works have a greater potential to impact directly on buried archaeology and to cause harm.*
- 6.89 No objection was raised by Historic England to the granting of planning permission, subject to a condition requiring Scheduled Monument Consent to be granted before the start of works. The decision report, in respect of the SM merely records that Historic England raised no objection and that Scheduled Monument Consent would be required.
- 6.90 The current application differs in the important respect that it does not present the potential for adverse impacts upon archaeological remains of the highest importance within the SM. Cotswold Archaeology's professional opinion, based on assessment of the evidence is that the proposed development would result in less than substantial harm (lower end) to the significance of the SM.

- 6.91 The issue of public benefit in relation to this level of harm is considered below under the Overall Planning Balance.

Reason for Refusal 3

- 6.92 The third reason for refusal in relation to the previous planning application was:
- 6.93 *The proposed development, due to the inadequate demonstration of visibility splays at the proposed access to the site and inadequate links into the cycleway network, would have an unacceptable impact on highway safety. The proposed development is therefore contrary to Policy DM24 of the Sites and Policies Plan Part 1: Development Management Policies, and paragraph 109 of the National Planning Policy Framework.*
- 6.94 This reason for refusal is based on comments from the Highway Authority requiring visibility splays based upon an 85th centile speed of 41mph. However, this is based on the 85th centile at a point to the west of the site, beyond the area relevant to calculation of the visibility splay. The relevant results from traffic survey data obtained in September 2019 show an 85th centile speed of 34mph in the westerly direction and 37mph travelling eastward.
- 6.95 The current application provides for a visibility splay calculated on the eastbound 85th centile speed of 37mph, which on the basis of Manual for Streets is 2.4m x 59m. This visibility splay is shown at Appendix 1 of the Transport Assessment submitted in support of the current planning application.
- 6.96 The reason for refusal also cites inadequate links to the cycle network. Therefore, the current application incorporates widened connecting paths (3.0m) to provide improved cyclist connectivity to the Festival Way cycle route.
- 6.97 The application proposal is therefore compatible with ensuring highway safety and the integration of cycleway and footway links.

Other Planning Issues

- 6.98 The previous planning application establishes the above as the only planning matters that are not agreed, given that the current application is fundamentally the same as the previous one.
- 6.99 However, for the sake of completeness, other planning issues are briefly considered below.

Housing Mix

- 6.100 Local policy requires that housing mix and type should meet local needs with reference to the latest SHMA or local needs surveys.
- 6.101 The application is for a development of 100% affordable housing. The Housing Needs Survey identified a substantial requirement for 1, 2, 3 and 4/4+ bedroom homes. The application proposal is in outline with all matters reserved except access. However, it is accompanied by an Illustrative Site Plan and this is based on a mix comprising 4 one bedroom, 10 two bedroom, 19 three bedroom and 2 four bedroom homes. Of the two

6 Planning Assessment

bedroom homes 4 are bungalows to address a specific need identified by the survey.

- 6.102 The details of the housing mix is to be determined at reserved matters stage but the illustrative proposal demonstrates that the site can contribute to a mixed and balanced community in Long Ashton through a mix of housing types and sizes to address requirements identified by the Housing Needs Survey in accordance with the provisions of Core Policy CS34.

Listed Buildings and Conservation Areas

- 6.103 A Heritage Settings Assessment has been undertaken by Cotswold Archaeology and is submitted in support of the outline planning application.
- 6.104 The Grade II Listed Kingcot Farmhouse, Gatcombe Mill, Batch Cottage, Long Ashton Magistrate's Court, Farleigh Hospital, 108 Weston Road and the Willows, and the Long Ashton, Westleaze & Wyke and Yanley Conservation Area are separated from the application site by distance, extensive modern developments, intervening mature vegetation, and the screening provided by topography. As a result, the Heritage Settings Assessment concludes that the proposed development would not affect the settings and significances of these assets in any way.

Landscape

- 6.105 A Landscape and Visual Impact Assessment (LVIA) has been undertaken by Tyler Grange in relation to the proposed development and this is submitted in support of the outline planning application.
- 6.106 The site is not subject of a landscape designation at an international, national or local level and the LVIA concludes that site and its immediate environs do not represent 'a valued landscape' in the context of the NPPF. The assessment demonstrates that the key elements related to the site itself and immediate surroundings constitute an ordinary landscape, valued no higher than of local importance.
- 6.107 The location of the proposal adjacent to the settlement edge is considered by the LVIA to be a logical location for development in protecting the wider countryside and Green Belt from inappropriate development. The western boundary of the proposed development will have a strong landscape buffer and this has been increased in depth compared to the previous application. The LVIA concludes that this will form a defensible boundary that provides an appropriate interface with the wider countryside. The landscape buffer will also wrap around the northern edge of the site, although views from the north are largely screened by the sloping topography and existing trees.
- 6.108 The LVIA assesses the effect of the completed development on the published character of the site as minor adverse, taking account of the landscape-led nature of the Illustrative Site Plan. However, the set back of the development by at least 10m from the northern and eastern boundary, with existing vegetation retained and new planting, will filter views from these areas.

From properties on Warren Lane views into the site are predominantly indirect and not from principal elevations, with substantial intervening vegetation reducing visual impact.

- 6.109 From other viewpoints the visual effects are assessed by the LVIA as minor adverse to negligible. This assessment is based on winter conditions and is likely to reduce in summer months as views are further filtered by trees and other vegetation coming into leaf.
- 6.110 The LVIA identifies a range of benefits that will be delivered by the development proposal and these, together with the fundamental importance of providing affordable housing to address a very substantial local need are considered to outweigh the limited landscape impacts. The proposed development, albeit detailed design is reserved for future determination, is carefully integrated with the adjoining urban area of Long Ashton to the east and with the wider countryside to the north and west. It will present a landscaped setting when viewed from Weston Road, the main approach to Long Ashton.
- 6.111 In landscape terms the development proposal is therefore considered to accord with the provisions of local policy DM10 and the NPPF.

Green Infrastructure, Trees and Ecology

- 6.112 Whilst layout and landscaping are reserved matters, a landscape led approach is proposed and this is reflected in the Illustrative Site Plan submitted in support of the outline planning application. Compared to the previous planning application the extent of green infrastructure has been increased by approximately 18%. The illustrative plan incorporates circa 0.89ha of green infrastructure, including public open space and allotments. All trees and hedgerows are to be retained and a report by Tyler Grange (Findings of BS5837 Tree Quality Survey & Development Implications) submitted with the application concludes that, based on the Illustrative Site Plan, there will be negligible or no impact on trees. Any impact will result only from a short section of footpath shown in the Illustrative Site Plan and can be addressed through an appropriate specification and working methodology secured by a planning condition.
- 6.113 An Ecological Assessment Report by Tyler Grange is submitted with the planning application. This concludes that the site is of limited ecological importance. Notwithstanding this, there a number of ecological considerations in relation to the development proposal requiring mitigation and potential for habitat enhancement. A principal consideration is bat assemblage and the ecological assessment concludes that appropriate buffers, with additional planting, are shown on the eastern boundary in the Illustrative Site Plan and that additional tree and hedgerow planting on the south and western boundaries together with green infrastructure and allotments, will increase foraging potential for bats. The assessment identifies a net gain in habitat of 0.28ha for greater horseshoe bats and of 0.07ha for lesser horseshoe bats. It sets out recommendations for mitigation and enhancement

Land South of Warren Lane, Long Ashton

measures in relation to bats and other species and these can be secured by appropriate planning conditions.

- 6.114 It is clear therefore that the principle of the development proposal is acceptable in terms of green infrastructure, trees and ecology and that through reserved matters submissions appropriate layout and design details can be incorporated to comply with the provisions of the NPPF and local policies CS4, CS9, DM8, DM9, ENV2 and ENV5.

Design and the Public Realm

- 6.115 Whilst the planning application is in outline, with all matters reserved except access, supporting information has been prepared to illustrate the intention of creating a development of high design quality and character.
- 6.116 The design process, consideration of context, design principles and illustrative proposals are described in the preceding chapters above. This material demonstrates how a distinctive new part of Long Ashton can be created, drawing on and reinforcing positive elements of its character, providing a good quality public realm that is accessible to everyone, with public open space, trees, allotments and a generous green edge to define the transition to open countryside to the north and west.
- 6.117 The detailed design will be resolved through reserved matters submissions and can be controlled at this outline stage through the submitted parameter plans. Design, public realm quality and green infrastructure provision can all therefore be achieved in accordance with the provisions of the NPPF on achieving well designed places and local policies CS12, DM32, DM 33 and LHN2.

Transport and Movement

- 6.118 Local and national planning policy seeks to maximise sustainable transport solutions through a pattern of development which facilitates the use of sustainable modes of transport and provides that developments that generate significant movement should be located where the need to travel will be minimised and use of sustainable transport modes can be maximised.
- 6.119 The application site immediately adjoins the existing built-up area of Long Ashton and has good pedestrian and cycle connectivity to the range of services and facilities available within the centre of the village.
- 6.120 Long Ashton is close to Bristol and is served by significant transport infrastructure that facilitates the use of sustainable modes of travel. The Long Ashton Park and Ride facility, with frequent bus services to central Bristol, is in close proximity to the village and accessible for cyclists via the Festival Way, as well as by car. Services have been enhanced through the introduction of a rapid transit service to the city centre and Bristol Temple Meads mainline railway station via the new South Bristol Link Road.
- 6.121 Nailsea and Backwell railway station is a short distance from Long Ashton, again accessible by cycle and car, for direct train services into Bristol and beyond to London, the Midlands and the North, or west to Weston Super Mare, Taunton and the South West.

- 6.122 A Transport Assessment has been carried out by Cole Easdon and this concludes that the site is well situated with good accessibility by public transport, walking and cycling, will have a negligible effect on traffic flows on the surrounding highway network and a suitable vehicular access to the site can be achieved in the form of a priority junction arrangement. A Travel Plan prepared by Cole Easdon is also submitted in support of the outline planning application. This sets out targets and measures for reducing car use, promoting walking and cycling and encouraging use of public transport.

- 6.123 In view of the sustainability attributes of the site location, the ability for suitable access to be provided, the negligible effect on the highway network and the measures put forward to encourage sustainable means of travel, the outline application proposal is considered to be acceptable in transport terms and to accord with the provisions of the NPPF and local policies CS1, CS10, DM24, ENV3 and T1.

Lighting

- 6.124 The planning application is in outline and lighting details will be designed and determined through the reserved matters process. However, in order to assess the principles of Lighting provision, a Lighting Assessment has been undertaken by Buro Happold and is submitted with the application.
- 6.125 The Lighting Assessment analyses, in respect of street, parking and amenity lighting, whether the proposed development as indicated in the Illustrative Site Plan complies with the ILE 'Guidance Notes for the Reduction of Obtrusive Light' in relation to surrounding receptors, and is conducive to foraging/commuting bats and wildlife with respect to the ILP 'Guidance Note 08/18 – Bats and artificial lighting in the UK – Bats and the Built Environment series'.
- 6.126 The Assessment concludes that light spill to the residential properties within the development does not exceed the 5 lux requirement and therefore would result in a negligible effect. Light spill will also be further reduced due to the trees and potential boundary enclosures.
- 6.127 Recommendations for mitigation are put forward and these can be secured through an appropriate planning condition:
- Columns in the middle of the development at 6-metres tall, while nearing the perimeter condition and wildlife corridor, column heights are reduced to 4-metres tall.
 - Shielding on luminaires may be required in the development to prevent light spill onto the residential properties within the development.
 - UV filtered luminaires should be used in order to minimise impact to sensitive foraging and commuting bats and invertebrates.
 - A warm white light source should be used in order to minimise impact to sensitive foraging and commuting bats and invertebrates.

6 Planning Assessment

6.128 It is therefore the case that, through the detailed design stage, an appropriate lighting scheme can be incorporated within the development to safeguard ecological and amenity interests in accordance with the requirements of national policy and local policies CS4, DM8, DM31 and ENV5.

Flood Risk and Drainage

6.129 A Flood Risk Assessment and Drainage Strategy has been prepared by Cole Easdon and is submitted in support of the outline planning application. This proposes management of surface water run-off for storms up to 1:100 year events +40% for climate change, via the existing public surface water sewer. An on-site sustainable urban drainage system will provide storage through permeable paving and cellular storage. Foul water will be discharged into the public sewer network.

6.130 The conclusion of the Flood Risk Assessment and Drainage Strategy is that the development can be accommodated without increasing flood risk in the locality, in accordance with the provisions of the NPPF and local policies DM1 and ENV6.

Sustainable Construction

6.132 An Energy Statement produced by Buro Happold accompanies the outline planning application. This recommends energy efficiency design and specification measures that will reduce energy demand by 7% and CO2 emissions by 5% compared to the minimum requirement of Building Regulations Part L for both regulated and unregulated energy. The Statement reviews potential sources of renewable energy and proposes use of air source heat pumps. The combined reduction in CO2 emissions from these measures, compared to Part L requirements, is forecast as 11% for both regulated and unregulated energy.

6.133 It is the case therefore that, whilst currently at outline stage, the proposed development will comply with the NPPF and local policies CS1, CS2 and DM2 in respect of sustainable construction as the design process is progressed through the detailed stage.

Ground Conditions

6.134 A Geoenvironmental and Geotechnical Desk Study has been undertaken by Buro Happold and is submitted with the outline planning application.

6.135 The desk study concludes that building foundations can be founded within the Mercia Mudstone or Quartzitic Sandstone underlying the site. A risk of radon gas is identified and it is recommended that full radon protection measures are implemented and waste characterisation testing is undertaken for any soils to be excavated/ requiring disposal. These measures can be secured through appropriate planning conditions.

6.136 Delivery of the outline development proposal can therefore ensure that environmental, health and safety interests are safeguarded in accordance with the provisions of the NPPF and local policy CS3.

Waste Management

6.137 A Site Waste Management Plan (SWMP) has been produced by Buro Happold and is submitted with the outline planning application. This is a live document, to be updated throughout the design and construction process, which identifies significant opportunities to reduce construction waste. A set of recommendations is put forward in the SWMP and implementation of these can be secured through an appropriate planning condition.

6.138 A Construction Environmental Management Plan (CEMP) has also been prepared by Buro Happold and is submitted with the application. This too is a live document, currently in outline form and to be further developed through the detailed design and construction stages. It is focused on the environmental management of the construction activities and facilitating the implementation of environmental mitigation measures. The proposals for management and mitigation can be secured by an appropriate planning condition.

6.139 Whilst the application is in outline, paragraphs 5.35 – 5.38 above and Figure 5.22 set out indicative proposals for storage and collection of waste. These arrangements are to be developed and confirmed through the detailed design process at reserved matters stage.

6.140 The SWMP, CEMP and indicative arrangements for operational waste and recycling provide a basis for managing construction waste and environmental mitigation and for ensuring appropriate waste/recycling storage and collection to enable delivery of development in accordance with NPPF provisions and local policies CS1, DM24 and DM32.

Overall Planning Balance

6.141 The current planning application is fundamentally the same as the application that was refused on 6 November 2020. Consequently, the scope of the issues considered by the local planning authority as determining the overall planning balance is defined by the three reasons for refusal for the previous planning application.

Rural Exception Affordable Housing

6.143 The principle of providing rural exception affordable housing to meet local community needs is established, subject to evidence of need, Parish Council support, development of a scale appropriate to the location, provision of affordable housing in perpetuity and a sequential approach to site selection.

6.144 As set out above and in the Updated HNS submitted with this application, housing need has been assessed in accordance with good practice and this demonstrates a high level of unmet need for affordable housing in Long Ashton. The application proposal to help address this need is for 100% affordable housing that would be secured in perpetuity through a S106 Agreement. It is of a scale appropriate to the location, as demonstrated above and in the Planning, Design and Access Statement submitted in support of the application. Discussion has been undertaken with Long Ashton Parish Council and the Council will provide its views once the application is

Land South of Warren Lane, Long Ashton

submitted. However, this requirement cannot, of itself, be a determining factor.

- 6.145 A sequential approach has been adopted towards site selection. There are no identifiable sites within the settlement boundary suitable for providing affordable housing and any that come forward in the future will inevitably be small and therefore unable to make a meaningful contribution to addressing local affordable housing need. The history of planning permissions over recent years suggests that any such sites will provide no affordable housing at all. Outside the settlement boundary, a call for sites exercise has led to a number of sites being put forward for future housing development. Some of these are of a large strategic scale and would not therefore be categorised as rural exception sites. None are considered to be sequentially preferable to the application site. In this respect, the SM designation on the application site is a principle consideration.

Scheduled Monument

- 6.146 The SM designation provides a basis for conserving the heritage significance of the designated area and for considering and controlling any development within it. It is not a prohibition on development, as evidenced by recent planning permissions within the heart of the SM area, where the below ground archaeological remains are of the highest value.
- 6.147 An Assessment of the heritage assets that give the SM its significance has been undertaken by Cotswold Archaeology. This notes that heritage significance across the SM area is not even and that within the application site it is anticipated that no archaeological remains of high significance will be truncated by the proposed development. It also concludes that in terms of setting, the proposed development will not influence or change the way in which the remains of the Roman Settlement covered by the SM are perceived, its purpose or landscape connections. Overall, the Assessment concludes that the proposed development would result in less than substantial harm (lower end) to the heritage significance of the SM. This needs to be weighed against the public benefits.

Highways

- 6.148 An updated Transport Assessment is submitted with the current planning application. This demonstrates that adequate visibility splays can be achieved in accordance with Manual for Streets and that appropriate links to the existing cycle network can be provided.

Other Planning Matters

- 6.149 As set out above, the application proposal is considered to comply with or be capable of meeting policy requirements at the Reserved Matters stage, in respect of housing mix, landscape, listed buildings and conservation areas, green infrastructure/trees/ecology, design and the public realm, lighting, broader transport and movement considerations, flood risk and drainage, sustainable construction, ground conditions and waste management.

Conclusions

- 6.150 There is a clear and significant unmet need for affordable housing in Long Ashton. The application site is immediately adjacent to the built-up area of this designated Service Village, where a well-designed affordable housing development would provide for modest organic growth to the western edge, in a highly sustainable location, to help address the acute level of need. It would result in some harm to the significance of the SM but, following extensive investigation and evaluation, this is assessed by Cotswold Archaeology as being at the lower end of less than substantial. Given the level of affordable housing need, the proposal to provide 35 affordable homes and the lack of viable and appropriate alternatives, the public benefit is considered to clearly outweigh this harm.
- 6.151 The proposal is therefore considered to meet the requirements of local policy CS17 and NPPF paragraphs 149(f) and 202 in respect of rural exception housing in the Green Belt and impact on heritage assets.
- 6.152 The development is in a sustainable location that facilitates travel by non-car modes. The submitted Transport Assessment provides an analysis of traffic survey data and demonstrates that safe access to the site can be achieved, with integration with the existing cycle network. The proposed development is therefore considered to comply with the requirements of local policy DM24 and NPPF paragraph 109.
- 6.153 Given the level of unmet housing need in Long Ashton and the absence of alternative proposals or deliverable opportunities to address this need, the application proposal for provision of 35 affordable homes carries great weight. This is considered to outweigh the limited harm that would arise.
- 6.154 In conclusion the development proposal accords with the central purpose of the planning system in helping to achieve sustainable development. As such there is a significant weight of planning advantage in approval of the outline application.

Appendix 1

Historic England's Letter 2016



SOUTH WEST OFFICE

Mr Richard Massey

Direct Dial: 0117 975 1300

Cotswold Archaeology

Stanley House

Our ref: PA00431727

Walworth Road

Andover

Hampshire

SP10 5LH

22 July 2016

Dear Mr Massey

Pre-application Advice

DEVELOPMENT OF BRIDGEMAN'S FIELD, LONG ASHTON

Following on from our meeting of the 10th June and having now reviewed the documentation provided I am writing to provide a response to your development proposals.

Bridgeman's Field was added to the scheduled monument of *Roman Settlement, part of an associated field system and earlier Iron Age settlement remains at Gatcombe Farm* (National List Entry Number 1011978) in 2014. The results of archaeological investigations in this area indicated that there was archaeology surviving which has the potential to tell us more about the development of Gatcombe and how the land was managed.

I will not revisit the debate about the significance of the archaeology and how and why



29 QUEEN SQUARE BRISTOL BS1 4ND

Telephone 0117 975 1308
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.

Historic England will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.

Land South of Warren Lane, Long Ashton



Historic England

SOUTH WEST OFFICE

it was scheduled. The field is now part of the scheduled monument and its archaeology has been recognised as nationally significant. This is partly for the survival of industrial activity and partly for its association with the walled Roman town and its landscape. The group value of the archaeology is significant.

Within the field there are areas of greater archaeological activity and significance and areas of less activity and significance. The western half of the field contains a large area demarcated by a ditch which continues into the adjoining fields and features within the pre-2014 scheduled area. The ditch that defines this area has a strong response in the geophysical surveys and seems to consist of two areas, a smaller area to the north and a larger area to the south. Associated with these ditches is evidence of ironworking and smelting. Although no furnaces/kilns were identified during the evaluation these would have been in close proximity to the evidence found. Some of the geophysical responses were also potentially from iron working activities. The majority of the material culture evidence comes from this half of the field.

The eastern half of the field had fewer features most of which are undated and were shallower. Only one ditch contained some Roman pottery.

The location of this occupation evidence in this valley appears to relate to the topography. At this location there is a high point in the valley floor and the watercourses flow away from this high point creating a dry crossing across the valley. The landscape context of the site is still evident being on the lower south facing slope of the valley edge, close to a water source. The land is fertile and there are resources close by of timber and iron ore.

The settlement sits within an agricultural landscape of mixed farming practices, as was the case in the Roman Period. The field boundaries and roadways have been altered, but the rural character of the landscape has not. Although the railway cuts through this landscape it is mainly hidden from view, as it sits within a deep cutting.

Long Ashton has now expanded westwards ending at Warren Lane, which is marked on the early mapping (e.g. 1842 Tithe Map). The fields between Gatcombe and Warren Lane did have surviving earthworks of field systems, some of which appear to be Roman. They were added to the schedule in 1995 after a survey in 1993 identified them as a rare survival associated with a known settlement. Unfortunately many of these earthworks have now been levelled through ploughing. Due to Class Consent 1 (The Ancient Monuments (Class Consents) Order 1994) if land was ploughed at the time of scheduling then ploughing could continue.

The proposal is for a small housing development within Bridgman's Field. Any development of this kind will remove the archaeology from these fields causing



29 QUEEN SQUARE BRISTOL BS1 4ND

Telephone 0117 975 1308
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.

Historic England will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.



Historic England

SOUTH WEST OFFICE

substantial harm to that area of the monument. However in the context of the whole monument it would be harm, but not substantial harm.

As I indicated at the meeting the small block of housing within the western half of the site is not acceptable. This is because it intrudes into the space defined by the large ditch, breaking the connection between the different elements.

The wider setting of the monument is the rural landscape it sits within, currently ending at Warren Lane. The removal of these fields from the rural landscape and extension of the modern village westwards would reduce the rural context of the settlement. This would cause harm by removing some of the rural character of the monument and bringing the urban edge closer to the settlement. By only developing the eastern half of the site this reduces this harm and would be a continuation of the linear settlement of Long Ashton.

The proposal within the eastern half of the field from the evidence, so far gathered, will not have a major impact on the significance of the monument. If the site is developed then this will require the excavation of the area to record the archaeology prior to its removal. The detail of this would be discussed as part of a planning and scheduled monument consent application.

Works on scheduled monuments are controlled through the Ancient Monuments and Archaeological Areas Act 1979 and will need to be agreed with the Secretary of State for the Department of Culture Media and Sport (DCMS). The DCMS's Policy Statement on Scheduled Monuments clearly states that for '..works proposed for development related purposes, the Secretary of State has particular regard to the following principles:

- Only in wholly exceptional cases will consent be granted for works that could result in substantial harm to, or loss of, the significance of a Scheduled Monument
- In cases that would lead to less than substantial harm to the significance of a Scheduled Monument the harm will be weighed against the public benefits of the proposal.

(Paragraph 20, page 8)

<https://www.gov.uk/government/publications/scheduled-monuments-policy-statement>

This follows the same policy guidance in the National Planning Policy Framework: paragraph 132 states that in considering the impact of proposed development on significance great weight should be given to the asset's conservation and that the more important the asset the greater the weight should be. Paragraph 134 goes on to state that if the proposals will lead to less than substantial harm this harm should be



29 QUEEN SQUARE BRISTOL BS1 4ND

Telephone 0117 975 1308
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.

Historic England will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.

Land South of Warren Lane, Long Ashton



Historic England

SOUTH WEST OFFICE

weighed against public benefits.

If we were to receive a planning application for this site we would state that the development would cause harm, which wasn't substantial but was still harm, and that the harm needed to be weighed against the public benefits. Any planning application would also require an assessment of impact on the setting of the Listed Buildings. This is to fulfil the requirement of the Planning (Listed Buildings and Conservation Areas) Act 1990 in Section 66(1) for the local authority to "have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses"

You would have to show the Local Planning Authority that your development delivers suitable public benefits which outweigh any harm to the Heritage Assets.

If planning is granted then we would expect the entire development site to be excavated and all archaeology to be removed with specific research questions in mind referred back to the South West Archaeological Research Framework (SWARF). This would include environmental sampling of all suitable deposits and scientific dating on undated features. Any archaeology exposed that was deemed significant and associated with the walled settlement would need to be preserved in situ (e.g. kilns/ furnaces, structures).

Please do contact me again if you wish to discuss this further.

Yours sincerely

Melanie Barge
Inspector of Ancient Monuments
E-mail: melanie.barge@HistoricEngland.org.uk



29 QUEEN SQUARE BRISTOL BS1 4ND

Telephone 0117 975 1308
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.

Historic England will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.

Appendix 2

Historic England's Letter 2019



Historic England

Mr Richard Massey

Direct Dial: 0117 975 1300

Cotswold Archaeology

Stanley House

Our ref: PA01043822

Walworth Road

Andover

Hampshire

SP10 5LH

9 December 2019

Dear Mr Massey

Pre-application Advice

BRIDGEMANS FIELD, OFF WARREN LANE, LONG ASHTON

I have now had a chance to look at this proposal and have discussed it with colleagues. I have also taken into account changes in National Policy regarding heritage assets.

Bridgeman's field lies within the scheduled monument of *Roman Settlement, part of an associated field system and earlier Iron Age settlement remains at Gatcombe Farm* (National Heritage List for England No. 1011978). The Roman settlement, part of an associated field system and earlier Iron Age settlement remains, at Gatcombe Farm, Long Ashton, North Somerset was designated as a Scheduled Monument for the following principal reasons:

- as a Roman small urbanised settlement with associated field systems, and with evidence of earlier occupation, the Gatcombe settlement is relatively rare in a national context;
- the site as a whole has a high potential for adding to our understanding of the



29 QUEEN SQUARE BRISTOL BS1 4ND

Telephone 0117 975 1308
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.

We respect your privacy and the use of your information. Please read our full privacy policy for more information
<https://www.historicengland.org.uk/terms/privacy-cookies/>

Land South of Warren Lane, Long Ashton



Historic England

contemporary agricultural and industrial methods, and the social and economic changes that the Roman Conquest brought;

- the area probably formed part of a wide network of Roman sites, with links to settlements in Bath and most probably Bristol.

The archaeology within the proposed development site has been recognised as being nationally important. This is partly for the survival of industrial activity and partly for its association with the walled Roman town and its landscape. This has the potential to tell us more about the development of Gatcombe and how the land was used and managed.

The location of Iron Age and Roman activity in this valley appears to relate to the topography. At this location there is a high point in the valley floor and the watercourses flow away from this high point creating a dry crossing across the valley. The landscape context of the site is still evident being on the lower south facing slope of the valley edge, close to a water source.

The buried remains of the settlement and its associated archaeology lie within an agricultural landscape of mixed farming practices, as was the case in the Roman period. The field boundaries and roadways have been altered, but the rural character of the landscape has not. Although the railway cuts through this landscape it is mainly hidden from view, as it sits within a deep cutting.

The proposal is for a small housing development within Bridgman's Field. Any development within the area will necessitate the removal of the surviving archaeology. This archaeology forms part of the evidential significance of the scheduled monument and its removal would cause harm to that significance.

The wider setting of the monument is the rural landscape it sits within, currently ending at Warren Lane. The scheduled fields around the walled settlement form part of its setting and how you now experience the monument within a rural landscape. The rural character of the area evokes the original character of the monument and this forms part of its aesthetic and historical significance. The development of this field would cause harm to this significance by removing some of the rural character of the monument and bringing the urban edge closer to the settlement.

Works on scheduled monuments are controlled through the Ancient Monuments and Archaeological Areas Act 1979 and will need to be agreed with the Secretary of State for the Department of Culture Media and Sport (DCMS). The DCMS's Policy Statement on Scheduled Monuments clearly states that for '...works proposed for development related purposes, the Secretary of State has particular regard to the following principles:

- Only in wholly exceptional cases will consent be granted for works that could result in substantial harm to, or loss of, the significance of a Scheduled



29 QUEEN SQUARE BRISTOL BS1 4ND

Telephone 0117 975 1308
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

We respect your privacy and the use of your information. Please read our full privacy policy for more information
<https://www.historicengland.org.uk/terms/privacy-cookies/>



Monument

- In cases that would lead to less than substantial harm to the significance of a Scheduled Monument the harm will be weighed against the public benefits of the proposal.'

(Paragraph 20, page 8)

<https://www.gov.uk/government/publications/scheduled-monuments-policy-statement>

This follows the same policy guidance in the National Planning Policy Framework (2019 revision): paragraph 193 states that in considering the impact of proposed development on significance great weight should be given to the asset's conservation and that the more important the asset the greater the weight should be. Paragraph 194 states that irrespective of the level of harm caused any harm or loss of significance will require clear and convincing justification.

If we were to receive a planning application for this site we would state that the development would cause harm, which would need to have clear and convincing justification. That harm would then need to be weighed against the public benefits. In light of the policy changes, emphasising the need to place great weight on the conservation of heritage assets and to avoid unnecessary harm, we would object to a planning application for development in this location.

Yours sincerely

A handwritten signature in black ink, appearing to read "Melanie Barge".

Melanie Barge
Inspector of Ancient Monuments
E-mail: melanie.barge@HistoricEngland.org.uk



29 QUEEN SQUARE BRISTOL BS1 4ND

Telephone 0117 975 1308
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

We respect your privacy and the use of your information. Please read our full privacy policy for more information
<https://www.historicengland.org.uk/terms/privacy-cookies/>

Land South of Warren Lane, Long Ashton

nash partnership

Bath Office: 23a Sydney Buildings, Bath BA2 6BZ
Phone: 01225 442424
Bristol Office: 35 King Street, Bristol BS1 4DZ
Phone: 0117 332 7560
Website: www.nashpartnership.com