



Historic England

Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

By e-mail

5 April 2023

Dear Planning Inspectorate

re: Land To The South Of Warren Lane North Of Weston Road Long Ashton
Application Ref: 21/P/3076/OUT
Appeal Ref: APP/D0121/W/23/3315584

Introduction

We write in respect of the above planning appeal, which we understand is to be determined by public inquiry.

Historic England thought it would be helpful to share the advice we have provided in respect of this application – please see attached letter dated 15 December 2021. This letter summarises our advice, with reference to the significance of the scheduled monument impacted by this proposed development, and the potential impact of the proposed development on the significance of the monument. We have also attached the National Heritage List for England (NHLE) entry for the scheduled monument (<https://historicengland.org.uk/listing/the-list/list-entry/1011978>) for information.

We will not be attending the inquiry.

Background

As set out in our letter of 15 December 2021, the proposal will lie within the “*Roman Settlement, part of an associated field system and earlier Iron Age settlement remains at Gatcombe Farm*” scheduled monument, which is known more commonly as Gatcombe Roman Town (see attached NHLE entry).

It may be of assistance to provide a summary of the history of scheduling on this site. The Roman walled settlement at Gatcombe Farm, Long Ashton, Somerset was first scheduled on 5th December 1955. At that time the scheduling was focussed around the Farm and the known walled site, now defined by a low earth bank.

In the 1990s the site was extended to include surrounding fields to the north and east as these contained evidence of former Roman field earthworks. This did not include two fields south east of the scheduled area – known as Bridgeman’s Field.



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However, there was a further amendment to the schedule on 27th November 2014 which saw the inclusion of the Bridgeman's Field in the designation.

A brief summary of our involvement with this site:

In 2012 an application was made from Cotswold Archaeology to carry out a geophysical survey (Section 42 Licence) of the Bridgeman's Field and the surrounding fields. Although Bridgeman's Field itself at that time was not within the scheduled area, the geophysical work would be conducted in this area, and in the surrounding fields which were scheduled. Historic England (at that time known as English Heritage) issued the licence on behalf of DCMS for the survey.

In 2013 a SMC application (Ref: S55618) was made by Cotswold Archaeology and granted by DCMS, to excavate 2 trial trenches within the scheduled area. This was part of the wider archaeology investigations for possible development. The evaluation report investigated various features identified by the geophysics survey.

In 2014 an application to extend the scheduled monument to include Bridgeman's Fields was submitted. The area was assessed, and we recommended to DCMS that the scheduled area should be extended to include Bridgeman's Fields. DCMS agreed the amendment and the fields were added to the schedule in November 2014.

In December 2014 the Applicant requested a review of the scheduling decision supported with a rebuttal document, which stated further information was to be provided. Additional evaluation trenching and geophysics were undertaken in August 2015 and this information was submitted to support the applicant's rebuttal.

Historic England then provided a response to the rebuttal and supporting information that had been provided.

DCMS subsequently considered all of the information that had been submitted and up-held the scheduling decision.

Between 2015 – 2021 Historic England were engaged in numerous pre-application discussions with the applicants regarding residential development proposals on Bridgeman's Fields. Through this engagement the applicant reduced the development area to the south eastern corner of the site closest to Long Ashton – land south of Warren Lane and north of Weston Road.

In our view we considered all the proposals would cause harm, which would need to have clear and convincing justification, and would then need to be weighed against the public benefits. We advised that in light of the high significance of the asset, we would object to a planning application for development in this location.

In 2020 a planning application (20/P/1547/OUT) was made to North Somerset Council for 35 (100%) affordable homes. North Somerset Council refused the application. We understand the decision was not appealed.

In 2021 a second application (21/P/3076/OUT) for 35 (100%) affordable homes was made. North Somerset Council refused that application, which forms the subject of this appeal.



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Approach of Historic England

Historic England's advice to the Local Planning Authority is provided in line with the importance attached to significance with respect to heritage assets as recognised by the Government's *National Planning Policy Framework* (NPPF) and in guidance, including the *Planning Practice Guidance* (PPG), and good practice advice notes produced by Historic England.

As the proposed development lies within a scheduled monument, then scheduled monument consent will be required. This will need to be considered in line with the controls placed on works to scheduled monuments by the *Ancient Monuments & Archaeological Areas Act, 1979* and government policy relating to scheduled monuments (*Scheduled Monuments & nationally important but non-scheduled monuments, DCMS 2013*).

Historic England has not yet received a scheduled monument consent application for this proposed development.

Significance of the scheduled monument

As set out in our letter of 15 December 2021 we noted that the walled Roman settlement, with its associated field system and earlier Iron Age settlement remains, 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 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.

We further noted that the location of Iron Age and Roman activity in this valley is at a location where there is a slightly higher point in the valley floor and the watercourses flow away from this high point, creating a dry crossing across the valley. This location would have been chosen due to the topography and landscape benefits of a settlement on dryer ground, exploiting the movement of people at the crossing point. 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 letter provides further information regarding significance.

Impact of development on the scheduled monument.

Again as set out in our letter we note that the development proposes the removal of over half of the scheduled archaeological remains within the development site - land south of Warren Lane and north of Weston Road.

These remains form the main part of the archaeological interest which contributes to the significance of the scheduled monument and its removal would cause harm to that significance. Within the area of the development this harm will be substantial as it will remove all of the remains. The loss of all the remains in this part of the site would result in a serious impact on the significance of the monument as a whole.



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However, the size of the monument, the concentration of remains within the Roman walled town, and the extent of extra-mural remains that would still be preserved needs to be considered. Taking the site within the context of the scheduled monument, as a whole, the level of harm caused would therefore be lower than the substantial harm identified on the development site in isolation.

The development of this field would also remove some of the rural character of the monument and would bring the urban edge of Long Ashton closer to the walled Roman settlement. This would also cause harm to the heritage assets' significance through loss of that rural landscape.

The harm, in our view, when taking all the above and the whole of the scheduled monument into consideration, is at the higher end of less than substantial

Historic England Position

We continue to be of the view that these proposals will harm the significance of this scheduled monument a heritage asset of the highest importance, and we object to the application on heritage grounds. It will be for you as decision maker to take these representations into account and given the importance of this asset the harm entailed should only be accepted if you are satisfied that there is clear and convincing justification that the public benefits decisively outweigh that harm.

Yours faithfully



The image shows a handwritten signature in black ink, which appears to read 'Mel Barge'. The signature is written in a cursive style. There is a faint, repeating watermark in the background that says 'electronic electronic electronic'.

Mel Barge (MS)
Inspector of Ancient Monuments
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Appendices

1. National Heritage List for England (NHLE) entry for the scheduled monument (<https://historicengland.org.uk/listing/the-list/list-entry/1011978>)
2. Planning Letter 15 December 2021



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