



Historic England

Sir/Madam . .

Direct Dial: 0117 975 1300

North Somerset Council

North Somerset Council, Post Point 15

Our ref: P01447581

Town Hall

Weston- Super-Mare

North Somerset

BS23 1UJ

15 December 2021

Dear Sir/Madam .

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND TO THE SOUTH OF WARREN LANE NORTH OF WESTON ROAD LONG
ASHTON
Application No. 21/P/3076/OUT**

Thank you for your letter of 26 November 2021 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The application for 35 affordable homes with associated infrastructure and landscaping will cause harm to the highly designated heritage asset of *Roman Settlement, part of an associated field system and earlier Iron Age settlement remains at Gatcombe Farm* (Mon No. 22848, NHLE 1011978). That harm has been assessed by us to be less than substantial, when assessed against the whole monument. Within the development site the complete removal of all archaeological remains, which forms



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the main significance of the heritage asset, means the level of harm is substantial.

That harm will need clear and convincing justification and substantial public benefits to outweigh the harm. It will be for the Local Authority to decide if there are sufficient public benefits, but there are no heritage benefits to this scheme.

The level of harm caused to the highly designated heritage asset is in our view contrary to the National Planning Policy Framework paragraphs 195, 199, 200, 201, 202 and 205. We recommend the application is refused due to the harm it would cause to the significance of a heritage asset of the highest importance.

Historic England Advice

The proposal is for a housing development of 35 dwellings with associated infrastructure within the eastern part of Bridgman's Field, alongside Warren Lane, Long Ashton. 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* (Mon No. 22848, NHLE. 1011978), known more commonly as Gatcombe Roman Town.

Significance

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.

(<https://historicengland.org.uk/listing/the-list/list-entry/1011978>)

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 over 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.



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The buried remains of the settlement and its associated archaeology lie within a modern 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, to the south of the site, it is mainly hidden from view as it sits within a deep cutting.

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 settlement and its landscape. This has the potential to tell us more about the development of Gatcombe and how the land was used and managed. Although some of the archaeology recorded on site during the evaluation work was not dated it can be interpreted as relating to the Iron Age and Roman activity on the site. There are also areas outside of the evaluation trenching that have not been looked at in detail. This means there may be additional remains in this area relating to the Iron Age or Roman occupation, which will contribute to the significance of the designated heritage asset.

The wider setting of the monument is the rural landscape it sits within, currently ending at Warren Lane to the east. The scheduled fields around the walled Roman settlement form part of its setting and contribute to the current experience of the monument within its wider 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 inclusion of this area within the Green Belt helps emphasise that rural setting.

Impact

The development proposes the removal of over half of the scheduled archaeological remains within Bridgeman's Field (the red line area). There is an associated mitigation strategy to record what is being lost.

This archaeology forms 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. 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.

That harm in our view, when taking all the above and the whole of the scheduled monument into consideration, is less than substantial. The Historic Environment Desk-Based Assessment, submitted in support of this application also concludes that the harm will be less than substantial (6.7).

Policy

Historic England's Advice is provided in line with the importance attached to significance and setting with respect to heritage assets as recognised by the Governments *National Planning Policy Framework (NPPF)* and in guidance, including the *Planning Practice Guidance (PPG)*, and good practice advice notes produced by Historic England on behalf of the Historic Environment Forum (*Historic Environment Good Practice Advice in Planning Notes*). The development will be determined in accordance with the Local Plan unless material considerations indicate otherwise, with particular regard to the following policies - Development Management *Policy DM6: Archaeology* and Core Strategy *Policy CS5: Landscape and the historic environment*.

As this development is proposed within a scheduled monument, then consideration of the government's policy relating to scheduled monuments *Scheduled Monuments and Nationally Important but non-scheduled monuments (DCMS 2013)* is required. Works to a scheduled monument would also need an application for scheduled monument consent as part of the controls for works under the *Ancient Monuments and Archaeological Areas Act 1979*.

National planning policy states that when considering the impact of a development on a heritage asset any harm to the significance of that asset should be taken into account to avoid or minimise conflict between the heritage assets conservation and any aspect of the proposal (NPPF 195).

When considering the impact of developments which would result in harm to significance of designated heritage assets, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be, irrespective of the level of harm caused (NPPF 199).

Any harm to heritage assets of the highest designation, as is the case here with Gatcombe Roman Town scheduled monument, should require clear and convincing





justification (Paragraph 200 b).

It is then for the Local Authority to weigh that harm against the *public benefits* of the proposal (paragraph 201 or 202). The ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted (NPPF 205).

The Department of Culture Media and Sports Policy Statement on Scheduled Monuments (October 2013) clearly states that the purpose of scheduling is to preserve monuments, as far as possible, in the state in which they have come down to us today (Paragraph 6).

It goes on to say 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.

Though relevant, the potential to record evidence of the past is not considered by the Secretary of State to be an important factor in determining if SMC should be granted in such circumstances. Consequently it will normally be given little weight. (Paragraph 20)

Position

In our view the development causes harm to the highly designated heritage asset. The development would bring no heritage benefits (PPG 020 Reference ID: 18a-020-20190723) and while wider (i.e. non-heritage) public benefits are a matter for the planning authority to consider and take a view on, any public benefits would have to outweigh the significant level of harm that these proposals would cause.

The main public benefit provided by the applicant is the 100% affordable housing. We would ask that the Local Authority is satisfied that the application provides clear and convincing justification for the need of affordable housing in this location under the Local Plan. If this housing can be provided elsewhere where it would not cause harm to a highly designated heritage asset the harm caused by this application cannot be



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justified.

Any works on scheduled monuments are controlled through the Ancient Monuments and Archaeological Areas Act 1979 and require consent from the Secretary of State for the Department of Digital Culture Media and Sport (DCMS). The application for scheduled monument consent is separate to the planning consent process. Scheduled Monument Consent (SMC) has not yet been applied for and any application for SMC will be assessed against the DCMS Policy Statement (October 2013) <https://www.gov.uk/government/publications/scheduled-monuments-policy-statement>

The Historic Environment Desk-Based Assessment quotes Historic England's Guide for Owners and Occupiers of Scheduled monuments in the Summary. The Guide says that some development in a scheduled monument is possible under certain circumstances. Those circumstances are allowed where a proposed development is shown to cause no harm to the significance of the scheduled monument in line with the DCMS Policy Statement paragraph 20. If there is less than substantial caused by the development the public benefits of the proposals will then be weighed against that harm. However the purpose of scheduling is to preserve monuments in the state they are in at the time of scheduling (DCMS 2013 paragraph 6). The Secretary of State therefore will not grant consent for development that is contrary to these policies.

The level of harm caused to the highly designated heritage asset is in our view contrary to NPPF and DCMS policies and we cannot support this application.

Recommendation

Historic England objects to the application on heritage grounds.

We recommend the application is refused due to the harm it would cause to the significance of a heritage asset of the highest importance. We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 195, 199, 200, 201,202 and 205.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely

M Barge

Melanie Barge



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Telephone 0117975 1308
HistoricEngland.org.uk





Historic England

Inspector of Ancient Monuments

E-mail: melanie.barge@HistoricEngland.org.uk



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