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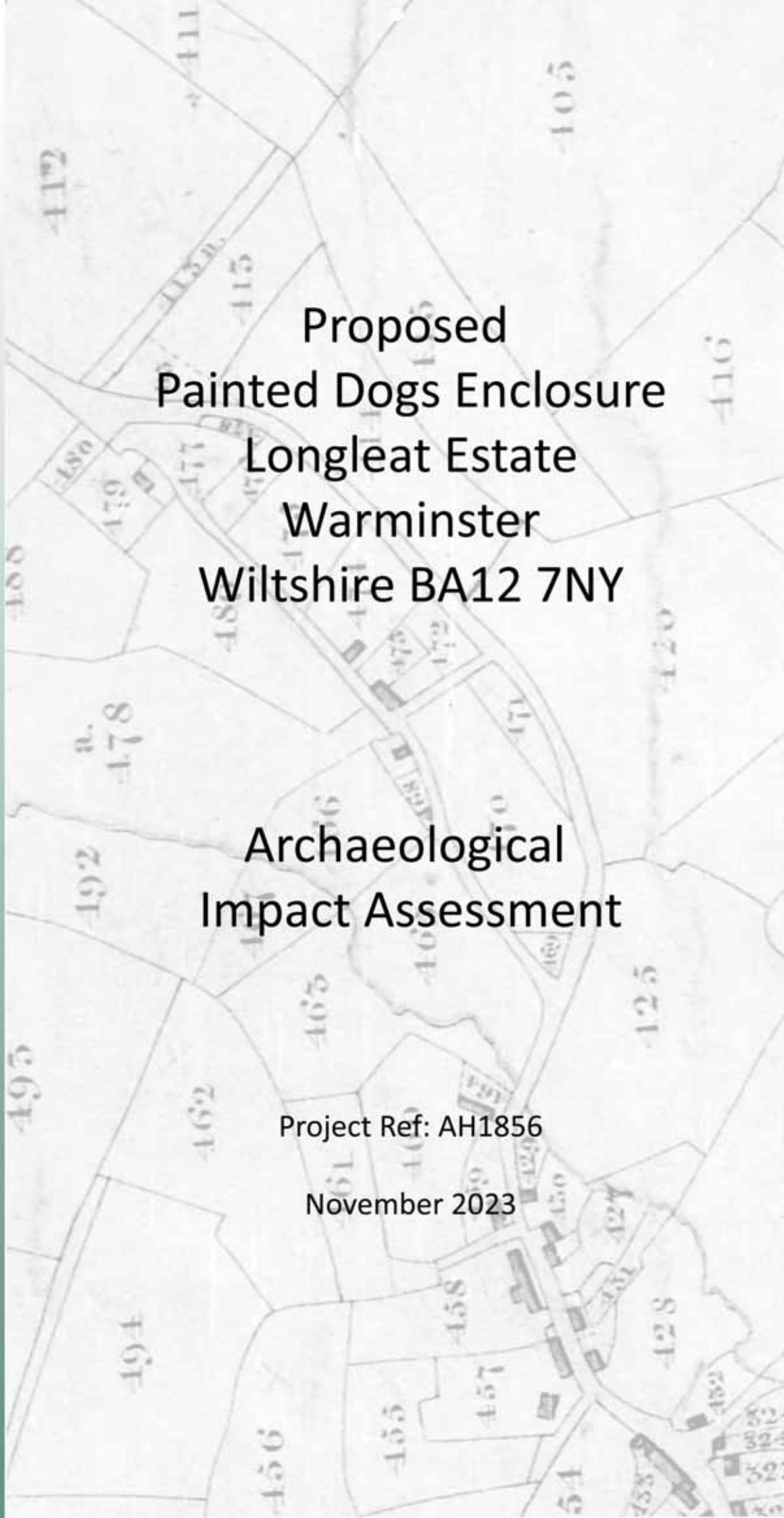

Proposed
Painted Dogs Enclosure
Longleat Estate
Warminster
Wiltshire BA12 7NY

Archaeological
Impact Assessment

Project Ref: AH1856

November 2023

REGISTERED · CIfA · ORGANISATION

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Prepared by	Rob Armour Chelu
Date	November 2023
Issue no.	01
Approved	Sue Farr 17/11/2023

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Foghamshire Timber Yard
Foghamshire Lane
Trudoxhill
Frome, Somerset BA11 5DG
T: 01373 836796
E: rob.ac@armourheritage.co.uk W: www.armourheritage.co.uk

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1. SUMMARY

PROJECT NAME: PROPOSED PAINTED DOGS ENCLOSURE
LOCATION: LONGLEAT ESTATE, WARMINSTER, WILTSHIRE BA12 7NY
NGR: 382001, 144118 (CENTRE)
TYPE: ARCHAEOLOGICAL IMPACT ASSESSMENT

This archaeological impact assessment (AIA) has been completed in respect of a proposal for the creation of a new animal enclosure and facilities within the Safari Park at the Longleat Estate, Warminster, centred on NGR 382001, 144118. The Site comprises an area of *c*. 0.53ha positioned at the northern edge of the Longleat Safari Park, south of an access road to the southwest of Longhedge, Wiltshire. The area is currently in use for a number of Safari Park related activities including a lemur enclosure.

It is proposed to redevelop the area to accommodate a group of African wild dogs, also known as 'painted dogs' or 'Cape hunting dog', with associated screening and facilities.

This AIA will examine the potential for buried archaeological remains at the Site only. Heritage matters will be assessed in a separate document.

The specific aims of this AIA were:

- an assessment of previous impacts at the Site; and
- an assessment of the potential for survival of archaeological deposits at the Site.

The potential for buried archaeology to survive at the Site has been assessed as low; this is considered true for all archaeological periods. Any buried archaeological features and/or finds which survive at the Site are considered likely to be of local importance and will most likely represent stray finds. The Site has been subject to minor remodelling and below ground impacts since it was first developed as part of the Safari Park in the later 20th century. The proposed development will result in fairly minor below ground impacts and it is not considered, given the potential assessed, that any further archaeological works are necessary at the Site prior to or during development.

The Historic Landscape Character recorded for the Site is recorded as *Leisure or cultural facilities*. The proposed works will have no effect on this HLC character type.

This assessment has been completed with due regard to the revised NPPF, the PPG, the Wiltshire Core Strategy Development Plan 2015, and guidance issued by Historic England and the CIfA.

2. INTRODUCTION

Outline

2.1. This archaeological impact assessment (AIA) has been completed in respect of a proposal for the creation of a new animal enclosure and facilities within the Safari Park at the Longleat Estate, Warminster, centred on NGR 382001, 144118 and referred to hereafter as 'the Site'.

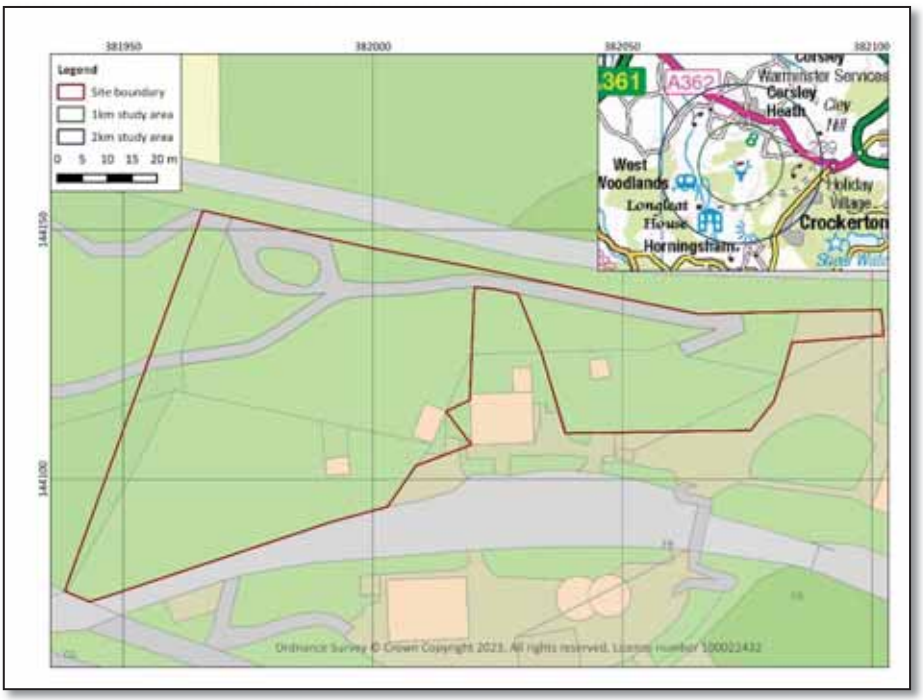

Image 1: Site location

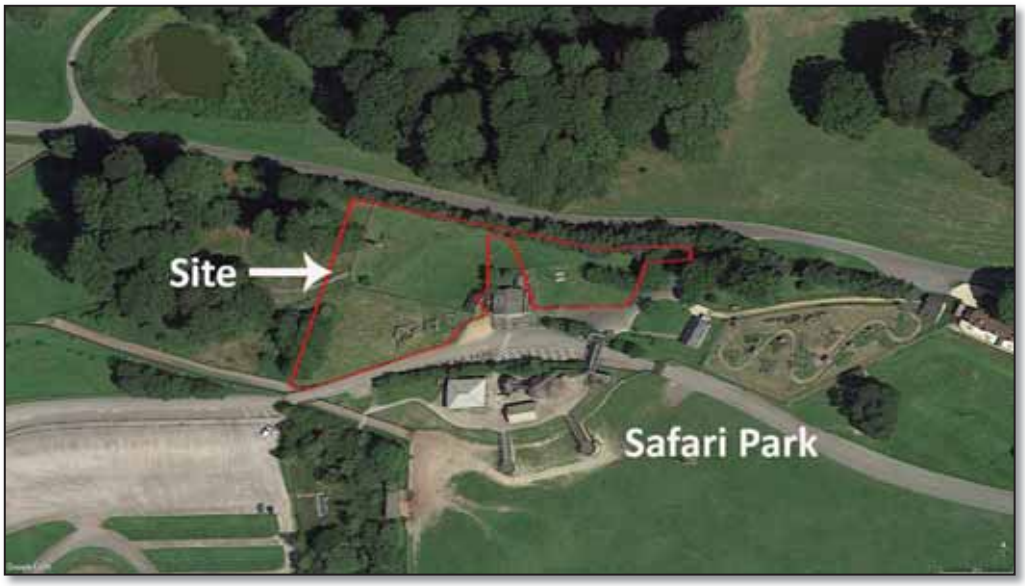

Image 2: Aerial view

2.2. The Site comprises an area of *c.* 0.53ha positioned at the northern edge of the Longleat Safari Park, south of an access road to the southwest of Longhedge, Wiltshire. The area is currently in use for a number of Safari Park related activities including a lemur enclosure.

2.3. It is proposed to redevelop the area to accommodate a group of African wild dogs, also known as 'painted dogs' or 'Cape hunting dog', with associated facilities.

2.4. This AIA will examine the potential for buried archaeological remains at the Site only. Heritage matters will be assessed in a separate document.

Topography and geology

2.5. The Site lies on elevated ground, sloping gently down from west to east and lying at elevations of between 169 and 167m OD.

2.6. The underlying geology of the Site is recorded by the British Geological Survey (BGS) as Cann Sand Member – Sandstone; a sedimentary bedrock formed between 113 and 100.5 million years BP. No superficial deposits are recorded.

Project aims

2.7. The specific aims of this assessment are:

- an assessment of previous impacts at the Site;
- an assessment of the potential for survival of archaeological deposits at the Site

Limitations of data

2.8. Much of the data used in this assessment consists of secondary information derived from a variety of sources, only some of which have been directly examined for the purposes of this assessment. Sources include the Wiltshire and Swindon Historic Environment Record (HER), Historic England and the British Geological Survey. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.

2.9. It is recognised that the HER does not comprise a record of all surviving elements of the historic environment resource in Wiltshire, representing instead a record of the discovery of a wide range of archaeological and historical components in the counties. The information held by the HER does not preclude the subsequent discovery of further elements of the historic environment that are, at present, unknown.

Copyright information

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Instruction and limitations of this report

2.11. Armour Heritage can accept no responsibility for the accuracy of the survey if the Site has been accidentally or deliberately disturbed leading to damage to, or removal of, historic fabrics, features or archaeological remains. Assignment of this report without the written consent of Armour Heritage Limited is forbidden. An assignment can be easily arranged but may require a re-assessment. In the case of a change of plans, site use, site layout or changes of use of the wider area or buildings and/or end use, then a new assessment may be required to ensure its fitness for purpose.

Assessment Criteria

2.12. The criteria used in this assessment to assign a value to the potential magnitude of impact resulting from development are set out in Table 1, below.

Table 1: Impact Magnitude Criteria

Magnitude of Impact	Defined as
Major Adverse	Total loss or major alteration of the assets or change in its setting, leading to the total loss or major reduction in the significance of the asset
Moderate Adverse	Partial Loss or alteration of the assets or change in its setting leading to the partial loss or reduction in the significance of the asset
Minor Adverse	Slight change from pre-development conditions to the asset or change in its setting leading to the slight loss or reduction in the significance of the asset
Negligible	No change or very slight change to the asset or change in its setting resulting in no change or reduction in the significance of the asset
Minor Beneficial	Slight improvement to the asset or change in its setting which slightly enhances the significance of the asset
Moderate Beneficial	Moderate improvement to the asset or change in its setting which moderately enhances the significance of the asset
Major Beneficial	Major improvement to the asset or change in its setting which substantially enhances the significance of the asset

3. ARCHAEOLOGICAL AND HISTORICAL CONTEXT

The Site

3.1. The Site comprises an irregular parcel of land of some 0.53ha situated at the northern extent of Longleat Safari Park and the associated Grade I Registered Park and Garden, recorded in the National List as Longleat (List Entry 1000439).

3.2. Currently the Site includes a number of minor attractions, including a lemur enclosure.

Site visit

3.3. The Site was visited on 24th October 2023 where the Site and its wider setting were walked over and visually assessed. Given the entirely landscaped finish to the area, no evidence for any archaeological, features was noted during the visit.

3.4. Observations made during the site visit have informed assessments of significance and impact set out later in this document.

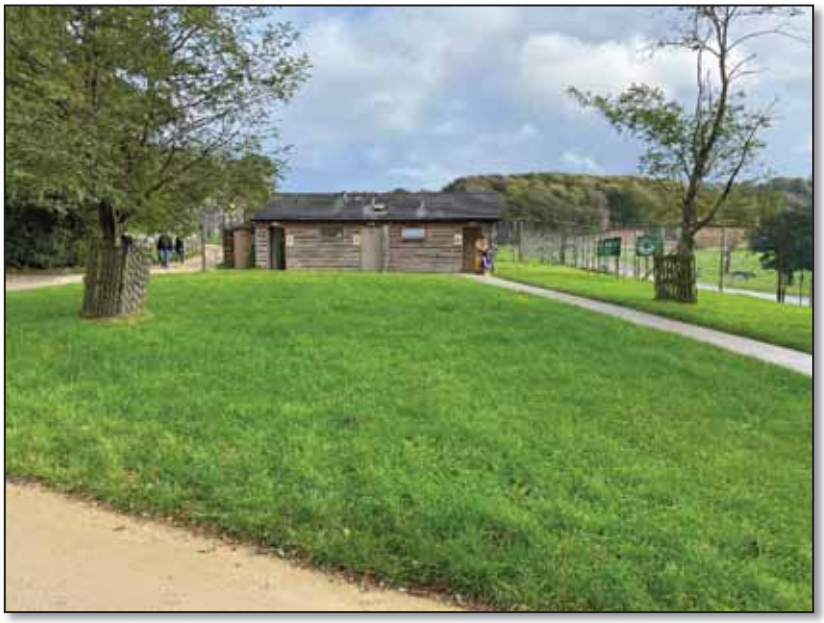

Image 3: Western area of the Site, looking east

Statutory and local heritage designations

3.5. A 1km study area was established, measured from the Site's boundary, to better quantify and understand the Site's archaeological context in relation to data acquired from the HER and other sources. The Site lies within Longleat, a Grade I Registered Park and Garden (Image 4, RPG1).

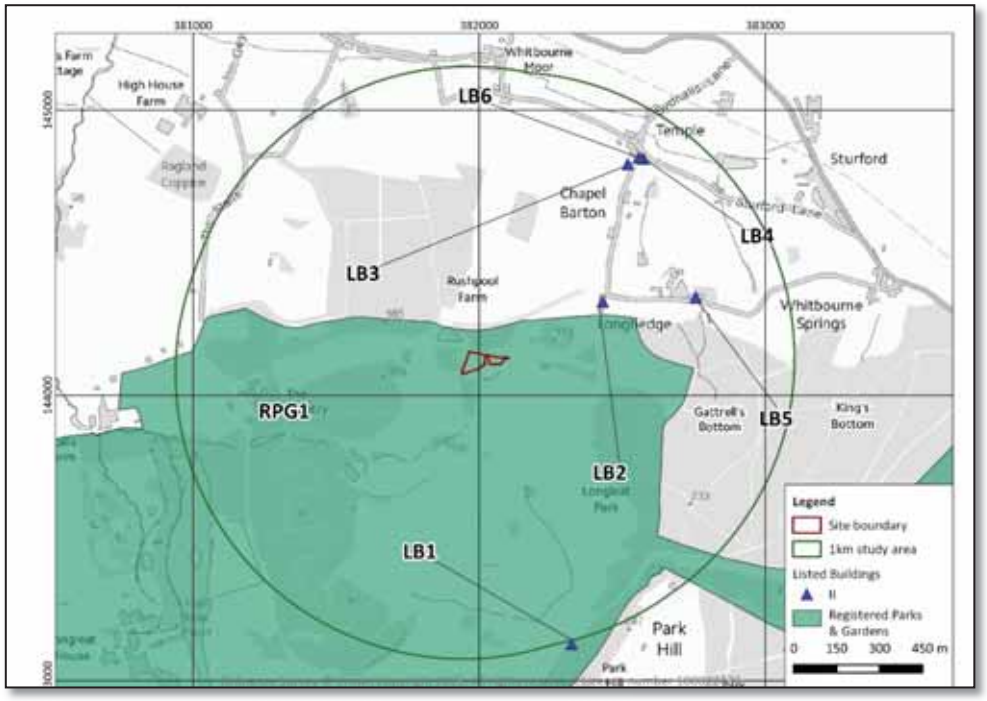

Image 4: Distribution of designated heritage assets in study area

3.6. A total of six Listed Buildings are also recorded in the study area, although none in particularly close proximity to the Site.

Archaeological and historical context

Previous studies

3.7. The HER records two archaeological or heritage related studies, referred to as 'events', in the study area. The first comprises an extensive study area which included the Site, assessing all archaeological monuments within the boundaries of the Longleat Estate (Image 5, EV1; Adam 1994).

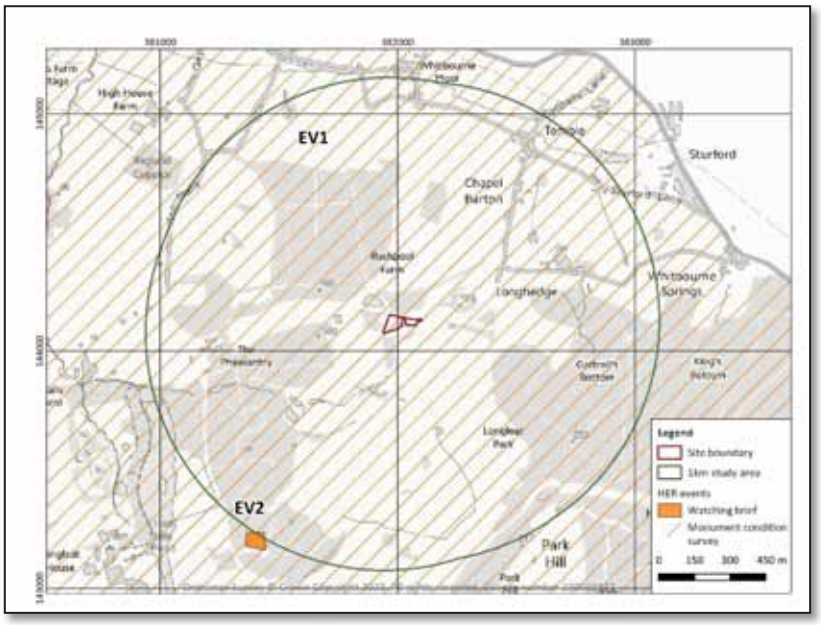

Image 5: Distribution of events in study area

3.8. The second investigation (Image 5, EV2) comprised an archaeological watching brief maintained during works at the Carnivore Enclosure (Heaton 2017). No remains of any significance were observed.

Prehistoric (pre-43CE) and Romano-British (43CE-410CE)

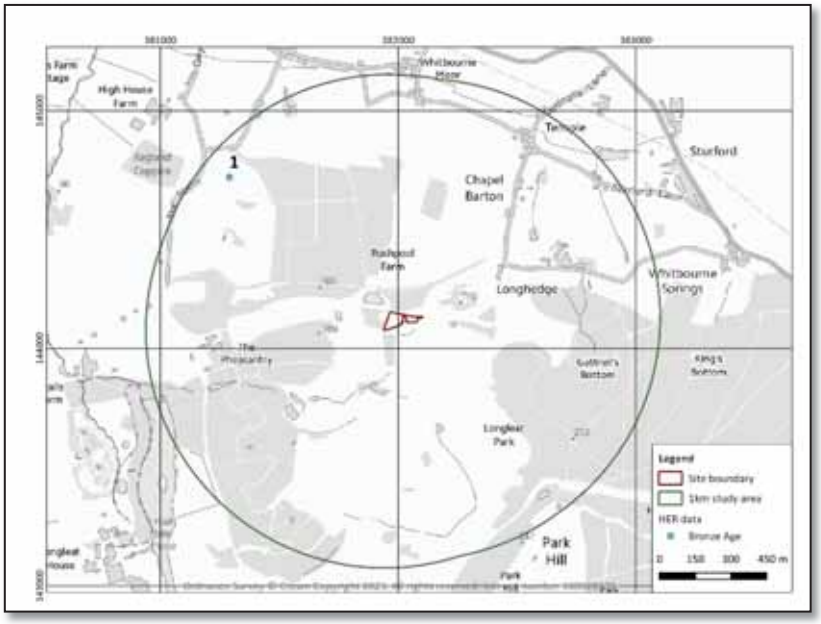

Image 6: Distribution of prehistoric evidence in study area

3.9. Archaeological data held by the HER relating to the prehistoric period in the study area is limited to a single record, documenting the findspot of two flint scrapers, considered to be of Bronze Age date (Image 6, 1; Prescott 1996). The potential for prehistoric archaeological remains to be recorded at the Site is considered to be low.

3.10. No data relating to the Romano-British period is held by the HER for the Site or study area and the potential for finds or features relating to this period is considered to be low.

Early medieval (410CE-1066CE) to medieval (1066-1539)

3.11. Whilst Longleat is not specifically recorded in the Domesday Book of 1086, a manor at Horningsham to the south is recorded as *Horningesham*. The place name is considered to potentially derive from the Old English suffix *hām*, meaning homestead, and a personal name, translating broadly to 'homestead of a man named Horning'. An alternative interpretation is that the first element derives from the Old English word *horning*, referring to a horn-shaped hill (Mills 2003).

3.12. Horningsham appears in two entries in the Domesday Book (Williams & Martin 1992), comprising the main settlement, which occupied an area of some 48.5ha, and Little Horningsham situated to the south of the present village, which remained separate from the manor of Horningsham until the 15th century.

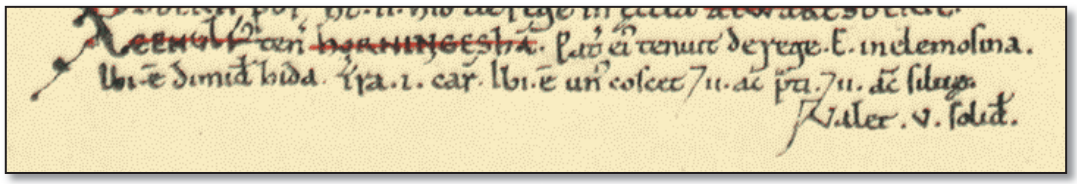

Image 7: First Domesday Book entry for Horningsham (Horningesham)

3.13. The earliest written reference to occupation at Longleat relates to the foundation of an Augustinian Priory, with the first Augustinian canons established in the Longleat area during the 12th century at Langley in Selwood Forest, some 3.5km from Longleat House. The priory was dedicated to St. Mary (Pugh & Crittall 1956). A second priory, dedicated to St. Radegund, was established at Longleat, on the site of the current Longleat House, at some point before 1235, although the exact date has never been established (*ibid.*). The priory was suppressed in 1529 and given to the Carthusian House of Hinton in Somerset.

3.14. The HER identifies only a single record relating to the medieval period in the study area, comprising the boundary of the medieval deer park (Image 8, 8). This boundary has been created from a record dating to 1422.

3.15. The potential for medieval finds and features at the Site is considered low and likely to be limited to stray finds.

Post-medieval (1540 to 1899)

3.16. Following the Dissolution, the priory at Longleat was sold by the Crown to Sir John Horsey of Clifton Maybank, Dorset who subsequently sold it on in 1540 to Sir John Thynne, a direct ancestor of the current owner. The earliest phase of development of Longleat Park and garden is recorded in 1547 although no discernible traces of the early garden remain within the modern landscape.

3.17. The HER records the location of a post-medieval farmstead, still partially extant, recorded at Warden's Farm some 995m northwest of the Site (Image 8, 10; Edwards 2014). Three further

post-medieval agricultural sites area recorded, comprising the site of a farmstead at Gattrell's Bottom (Image 8, 3); a farmstead at Norton Common (Image 8, 2) and an outfarm to the east of Longhedge (Image 8, 4). All sites were recorded as part of the Wiltshire Farmsteads Mapping Project (Edwards 2014). Other records for the post-medieval period refer to historic unlisted buildings.

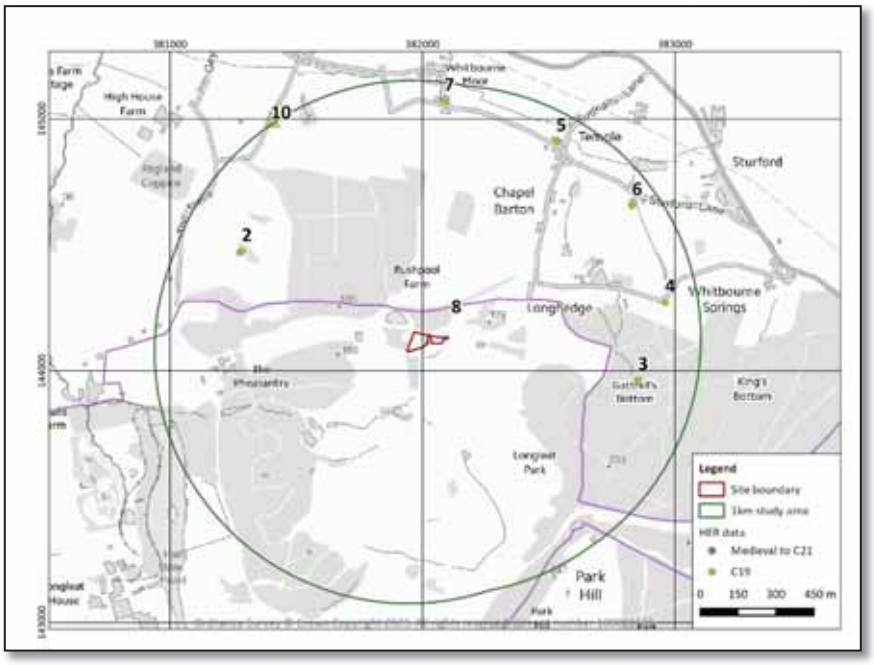

Image 8: Distribution of medieval and post-medieval evidence in the study area

3.18. It is considered that any evidence for post-medieval activity at the Site will comprise stray finds associated with post-medieval activity in the area.

Undated sites and monuments

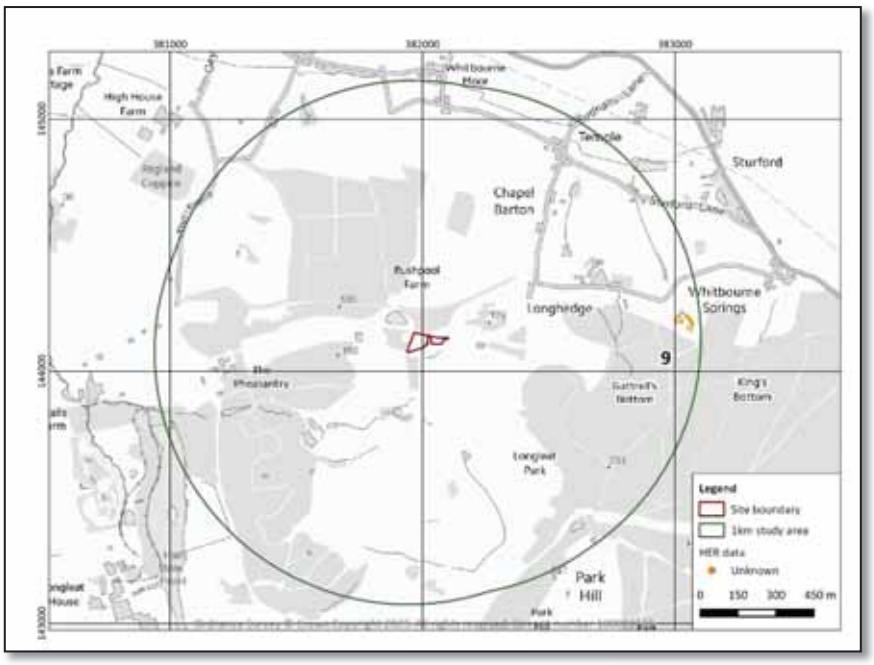

Image 9: Distribution of undated evidence in study area

3.19. The HER records a single undated site in the study area, comprising cropmark evidence for an enclosure to the west of Reeves Plantation, *c*. 910m east of the Site (Image 9, 9). The site was identified from an aerial photograph.

Historic map regression: the developmental history of the Site

3.20. The study of historic maps can help to identify the evolution of the settings of historic places, and aid in the identification of how they have changed through time. Historic map regression can also identify historic relationships, such as designed views or routeways, which may have become fossilised in the historic landscape or streetscape.

1773 Andrews and Dury Map of Wiltshire

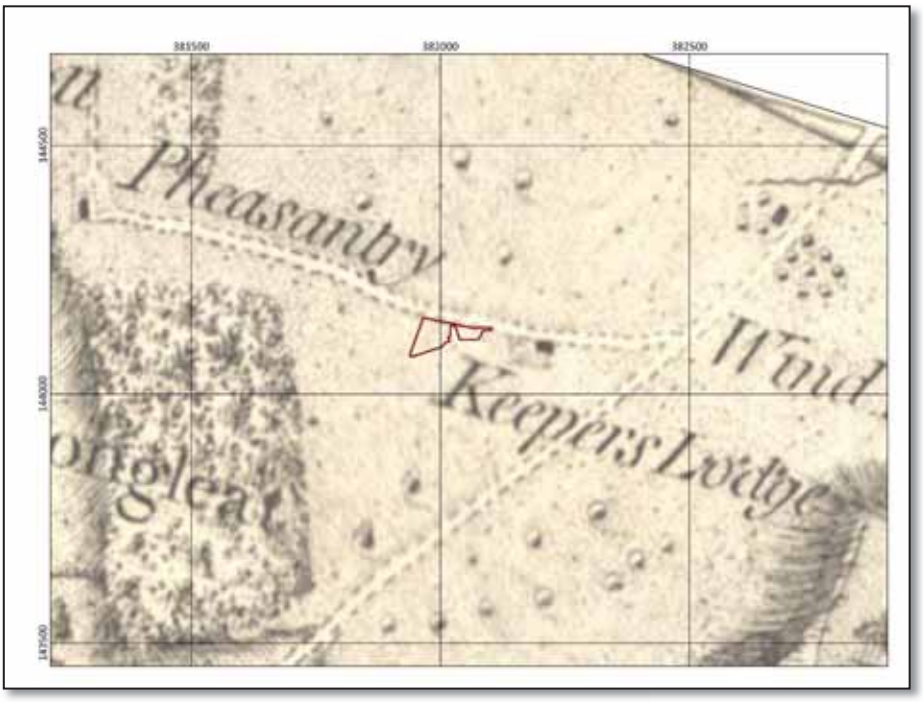

Image 10: 1773 Andrews and Dury - Map of Wiltshire

3.21. Andrews and Dury's late 18th century map of the county shows the position of the Site, with the nearby Gamekeepers Cottage identified as *Keepers Lodge*. The wider area is annotated *Viscount Weymouth's*. The Site is shown as open land at this time, part of the wider deer park.

3.22. The second edition of Andrews and Dury's map, a revision of the original produced in 1810 to reflect the recently completed system of canals across the region, shows no apparent change at the Site. The only notable difference is the identification of the landowner as the Marquis of Bath rather than Viscount Weymouth.

1808 Edmund Crocker – Frome

3.23. This early 19th century illustration represents one of a large group of hand drawn maps produced for the Ordnance Survey around the turn of the 19th century.

3.24. The maps shows the Site as part of the wider rough ground in the north of the Longleat Estate, with little change notable since the first Andrews and Dury map of 1773.



Image 11: 1808 Edmund Crocker – Frome

1840 Warminster Parish tithe map

3.25. The tithe map for Warminster parish was completed in four parts in 1840 by Cruse and Fox, with the apportionment document compiled in the same year. The map includes hill drawings, foot and byways, waterbodies, houses, woods, coppices, plantations, open fields, building names, a poorhouse, a limekiln, a hillfort, a vicarage and strip lynchets (Kain & Oliver 1995).

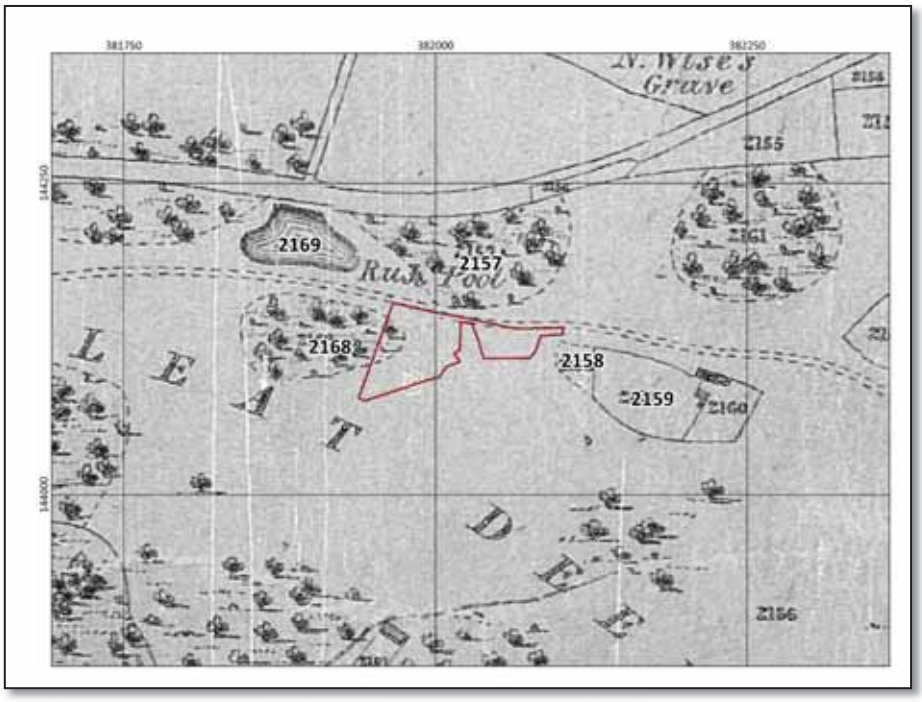

Image 12: 1840 Warminster Parish tithe map

3.26. Much of the Site and its surroundings is untithed formed of uncultivated open heathland under the ownership of the Marquis of Bath.

1887 Ordnance Survey County Series 1:2,500

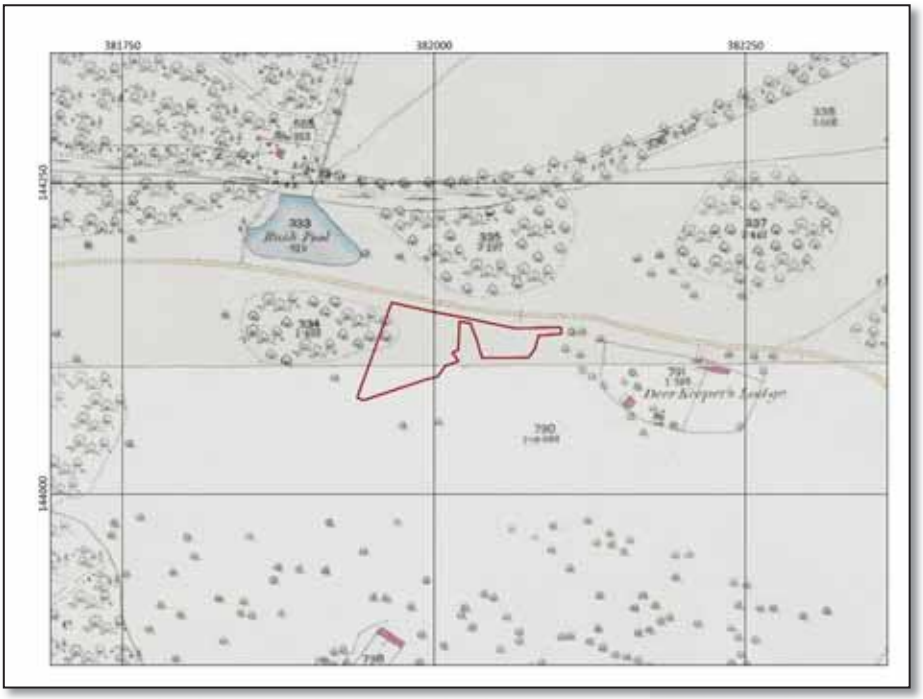

Image 13: 1887 Ordnance Survey County Series 1:2,500

3.27. Little change is evident since the issue of the tithe map. The building to the east is named here as *Deer Keeper's Lodge*.

1904 Ordnance Survey County Series 1:2,500

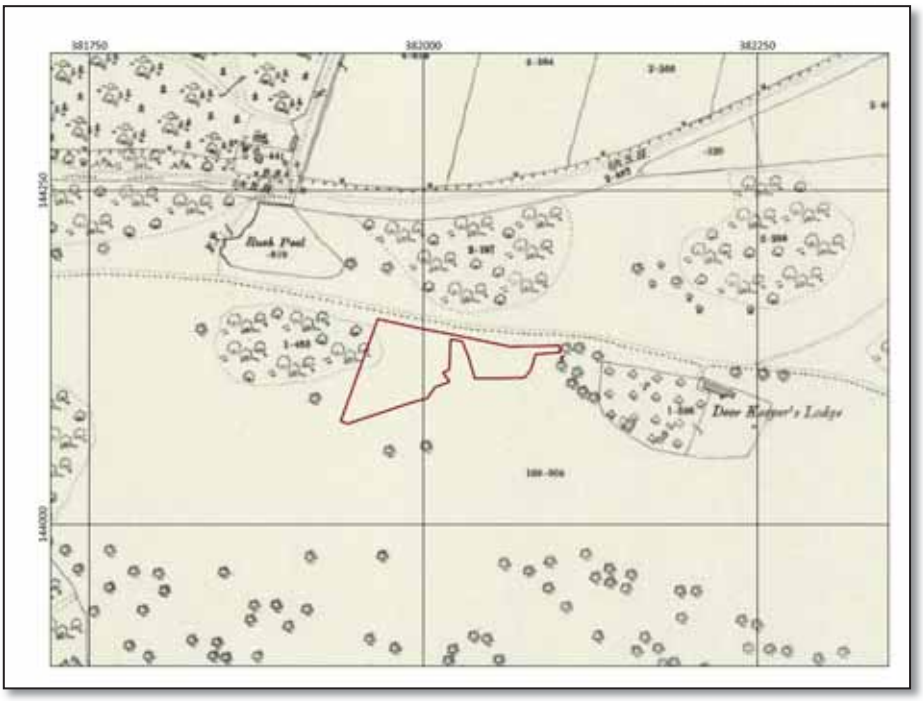

Image 14: 1904 Ordnance Survey County Series 1:2,500

3.28. The OS map from 1904 shows no change or development at the Site.

1924 Ordnance Survey County Series 1:2,500

3.29. By 1924 no change is evident at the Site or close by.

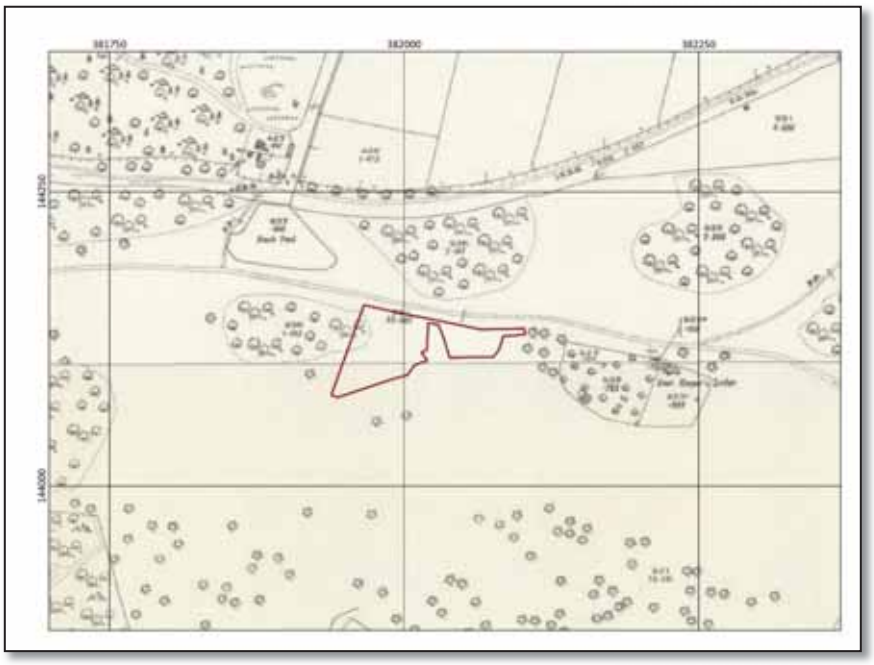

Image 15: 1924 Ordnance Survey County Series 1:2,500

1958 Ordnance Survey 1:25,000 Series

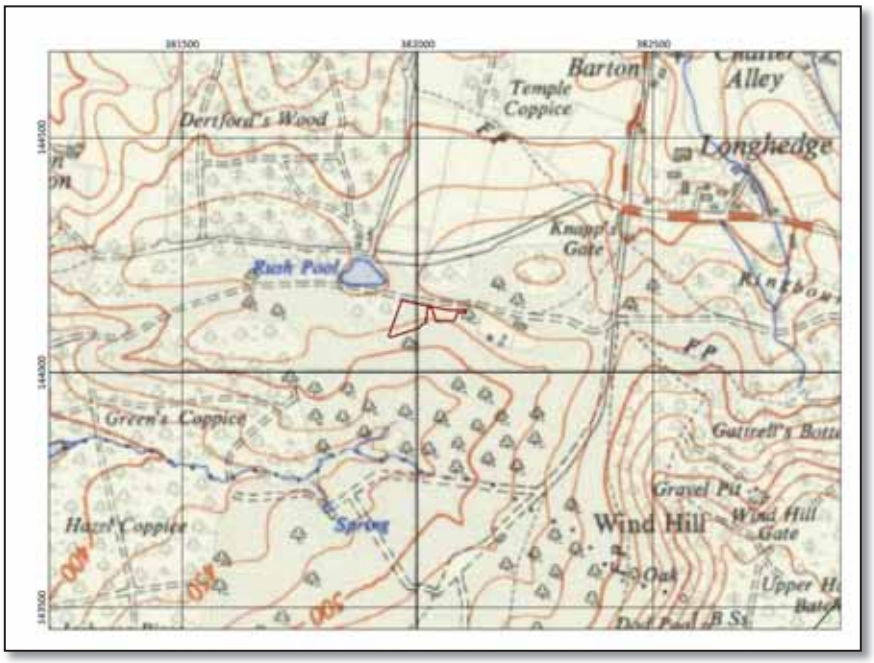

Image 16: 1958 Ordnance Survey 1:25,000 Series

3.30. Whilst less detailed than the previous map, the 1958 issue shows an undeveloped Site.

1993 Ordnance Survey Plan 1:10,000

3.31. By the early 1990s, this part of the Estate remains undeveloped.

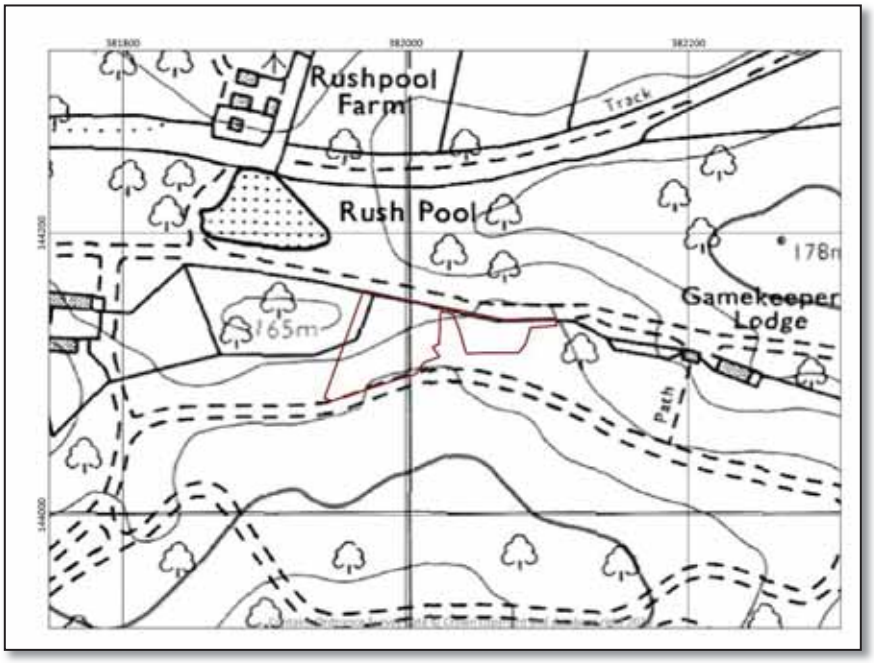

Image 17: 1993 Ordnance Survey Plan 1:10,000

Satellite imagery

3.32. The Google Earth satellite image sequence covers the period 2001 to 2022. The 2001 image shows development at the Site with a square building between the two areas, as today, along with parking and a road to the south. Within the eastern half of the Site is a pathway and a small shed. By 2005 an enclosure fence has been built close to the northern boundary and by 2007 areas of hard standing are evident in the eastern half of the Site with further pathways in the west. Subsequent photography show various realignments of paths, enclosures and buildings.

Historic Landscape Character

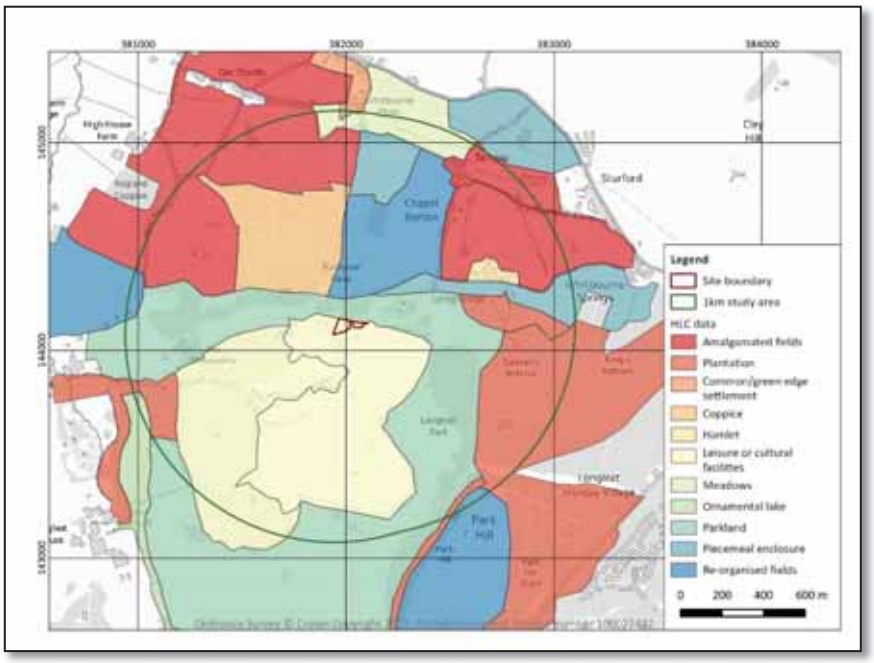

Image 18: Historic Landscape Character

3.33. The Historic Landscape Characterisation (HLC) for Wiltshire records the Site under the broad type *Leisure or cultural facilities*, reflecting the nature of the parkland and Safari Park.

4. ASSESSMENT OF SIGNIFICANCE

Buried archaeology

4.1. The potential for buried archaeology to survive at the Site is considered to be low. This applies to all archaeological periods. Any material which might be buried at the Site will most likely represent stray finds and be of local significance.

Historic Landscape Character

4.2. The Historic Landscape Characterisation for the county describes the Site thus: "This part of Longleat Park is in use as a safari park. Previously, it was part of the wider post medieval landscape park which dated to the C16-C19. Prior to this, the land here was part of a medieval deer park, as noted on some historic maps".

4.3. Archaeologically the HLC of the Site is considered minor significance.

5. ASSESSMENT OF IMPACT

Planning proposal

5.1. The planning proposal comprises a suite of works designed to create a new enclosure housing African wild dogs with associated screening and facilities. Image 19 below shows the proposed extent of the new enclosure (blue line) and proposed mesh tunnels (red line).

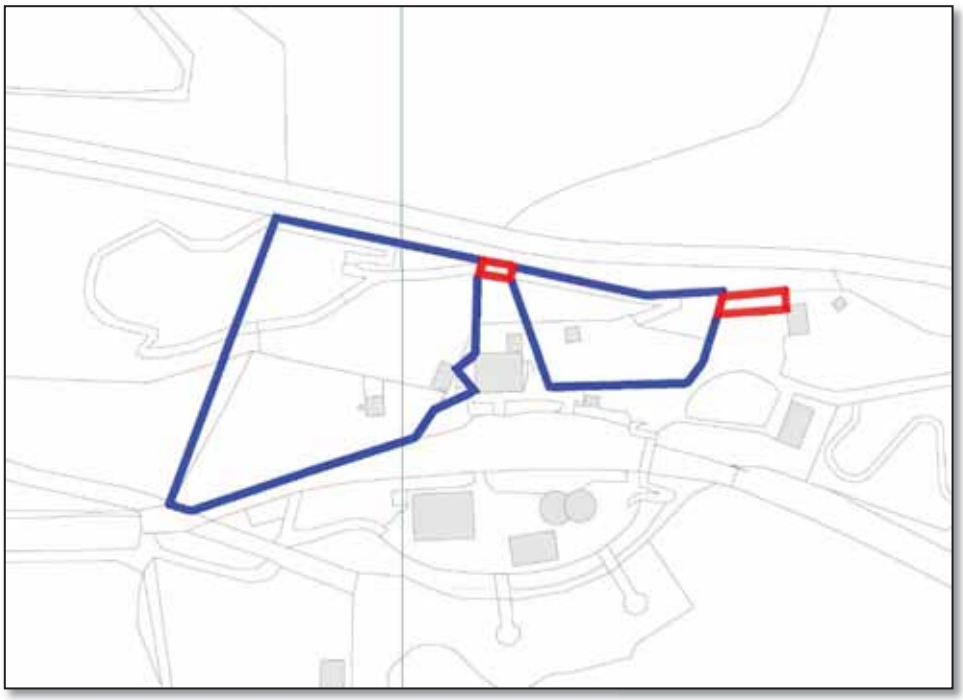

Image 19: Proposed layout of new enclosure

Buried archaeology

5.2. The potential for buried archaeology at the Site has been assessed as low for all archaeological periods. The proposed development will result in fairly minor below ground impacts and it is

not considered that any further archaeological works are necessary at the Site prior to or during development.

Historic Landscape Character

5.3. The Historic Landscape Character recorded for the Site is recorded as *Leisure or cultural facilities*. The proposed works will have no effect on this HLC character type.

6. CONCLUSION

6.1. The potential for buried archaeology to survive at the Site has been assessed as low; this is considered true for all archaeological periods. Any buried archaeological features and/or finds which survive at the Site are considered likely to be of local importance and will most likely represent stray finds. The Site has been subject to minor remodelling and below ground impacts since it was first developed as part of the Safari Park in the later 20th century. The proposed development will result in fairly minor below ground impacts and it is not considered, given the potential assessed, that any further archaeological works are necessary at the Site prior to or during development.

6.2. The Historic Landscape Character recorded for the Site is recorded as *Leisure or cultural facilities*. The proposed works will have no effect on this HLC character type.

6.3. This assessment has been completed with due regard to the revised NPPF, the PPG, the Wiltshire Core Strategy Development Plan 2015, and guidance issued by Historic England and the CIfA.

7. SOURCES AND REFERENCES

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Appendix 1: Gazetteer of heritage assets

FIG. REF.	HE/HER REF.	NAME	TYPE	PERIOD	SUMMARY	STATUS	EAST	NORTH
Designated Sites and Monuments (Historic England data:1km study area)								
Listed Buildings (1km study area)								
LB1	1036391	Milestone About 300 Metres To East Of Park Hill Cottage	Milestone	Post-medieval	Milestone. Early C18.	II	382323	143129
LB2	1036541	Knapp's Gate Cottages	Cottages	Post-medieval	Pair of semi-detached cottages. Early C19 for Longleat Estate	II	382432	144329
LB3	1180496	Church Of St Mary	Church	Modern	Anglican chapel of ease. 1902-03 by W.H. Stanley of Trowbridge.	II	382519	144811
LB4	1180514	The Old Dyehouse	House	Post-medieval	Detached house. Early C18, altered late C18 and C19.	II	382574	144830
LB5	1194497	The Garden Cottage	House	Post-medieval	Detached cottage. Late C17 and early C18.	II	382757	144345
LB6	1364285	35 And 36	Cottages	Post-medieval	Two semi-detached cottages. Probably early C16, altered C17 and C19	II	382559	144835
Registered Parks and Gardens (1km study area)								
RPG1	1000439	Longleat	RPG	Post-medieval	A grand C16 mansion surrounded by formal gardens and pleasure grounds with elements of the early C19 layout, added to in the mid C19 by William Taylor, in the mid C20 by Russell Page, and in the late C20 by the seventh Marquess of Bath. These sit in extensive parkland, largely of mid C18 origin by Lancelot Brown, with additions by Humphry Repton who produced a Red Book in 1804, by Jeffry Wyatville, and by Russell Page in the 1930s.	n/a	381679	143180
Wiltshire HER data (1km study area)								
1	ST84SW151	South of Warden's Farm	Findspot	Bronze Age	Bronze Age Scrapers, South of Warden's Farm	n/a	381290	144720

2	MWI64752	Norton Common	Farmstead	C19	Partially extant 19th century farmstead	n/a	381284	144475
3	MWI64839	Site of Farmstead at Gattrell's Bottom	Farmstead	C19	Demolished 19th century farmstead	n/a	382853	143963
4	MWI64840	Site of Outfarm, East of Longhedge	Outfarm	C19	Demolished 19th century outfarm.	n/a	382960	144272
5	MWI64841	Temple (Temple Farm)	Farmstead	C19	Partially extant 19th century farmstead	n/a	382530	144913
6	MWI64844	Field Barn, South of 28 Sturford Lane	Outfarm	C19	Extant 19th century outfarm	n/a	382830	144658
7	MWI71486	45 Whitbourne Moor	Farmstead	C19	Extant 19th century farmstead	n/a	382085	145073
8	ST84SW526	Longleat Parkland (Registered)	Deer Park?; Formal Garden; Park; Walled Garden; Boating Lake; Orangery; Bridge; Rose Garden	Medieval to C21	Post medieval landscape park, created from a deer park recorded in 1422, with 19th century and 20th century formal gardens of 2.5ha	n/a	381679	143180
9	ST84SW608	West of Reeves Plantation	Square Enclosure	Unknown	A square enclosure with internal features is visible on an aerial photograph.	n/a	383050	144189
10	MWI64755	Wardens Farm	Farmstead	C19	Partially extant 19th century farmstead.	n/a	381417	144980
Wiltshire HER Events data (1km study area)								
EV1	EWI3302	Longleat Estate	Condition Survey	n/a	Field Inspections of All Archaeological Monuments on the Longleat Estate	n/a	381917	144208

EV2	EWI9393	Carnivore Enclosure, Longleat	Watching brief	n/a	Watching Brief at Carnivore Enclosure, Longleat	n/a	381417	143223

Appendix 2 Planning policy and guidance

Introduction

There is national legislation and guidance relating to the protection of, and Proposed Development on or near, important archaeological sites or historical buildings within planning regulations as defined under the provisions of the Town and Country Planning Act 1990. In addition, local authorities are responsible for the protection of the historic environment within the planning system.

Planning policy and guidance

This assessment has been written within the following legislative, planning policy and guidance context:

- National Heritage Act 1983 (amended 2002);
- Town and Country Planning Act (1990);
- Planning (Listed Buildings and Conservation Areas) Act (1990);
- National Planning Policy Framework (2021);
- Planning Practice Guidance, Historic Environment (last updated July 2019);
- Historic Environment Good Practice Advice in Planning: Note 2 - Managing Significance in Decision-taking in the Historic Environment (Historic England 2015)
- Historic Environment Good Practice Advice in Planning: Note 3 - The Setting of Heritage Assets (Historic England 2015);
- Conservation Principles: policies and guidance for the sustainable management of the historic environment (English Heritage 2008).

Planning (Listed Buildings and Conservation Areas) Act (1990)

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Listed Buildings Act) imposes a general duty in respect of Listed Buildings in the exercise of planning functions.

Subsection (1): "In considering whether to grant planning permission for development which affects a Listed Building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses".

National Planning Policy Framework (NPPF)

Chapter 16: Conserving and enhancing the historic environment

189. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value66. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations67.

190. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

c) the desirability of new development making a positive contribution to local character and distinctiveness; and

d) opportunities to draw on the contribution made by the historic environment to the character of a place.

191. When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

192. Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:
a) assess the significance of heritage assets and the contribution they make to their environment; and
b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

193. Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

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

195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

196. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

197. In determining applications, local planning authorities should take account of:
a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
c) the desirability of new development making a positive contribution to local character and distinctiveness.

198. In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

Considering potential impacts

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

200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional68.

201. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
a) the nature of the heritage asset prevents all reasonable uses of the site; and
b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
d) the harm or loss is outweighed by the benefit of bringing the site back into use.

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

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

204. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

205. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible69. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

206. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

207. Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

208. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies, but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies

Planning Policy Guidance (PPG)

Setting

On 'setting', the PPG sets out (para. 013 Reference ID: 18a-013-20190723) that "All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent".

It continues "The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time".

Harm

The PPG sets out further information on the degrees of harm which might result from development affecting a heritage asset (para. 018 Reference ID: 18a-018-20190723). It states "Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 194-196) apply. Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated".

It continues "Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting. While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings' significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or

no harm at all. However, even minor works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting".

A further section addresses the concept of harm in a Conservation Area situation (para. 019 Reference ID: 18a-019-20190723). It states that "Paragraph 201 of the National Planning Policy Framework is the starting point. An unlisted building that makes a positive contribution to a conservation area is individually of lesser importance than a listed building. If the building is important or integral to the character or appearance of the conservation area then its proposed demolition is more likely to amount to substantial harm to the conservation area, engaging the tests in paragraph 195 of the National Planning Policy Framework. Loss of a building within a conservation area may alternatively amount to less than substantial harm under paragraph 196. However, the justification for a building's proposed demolition will still need to be proportionate to its relative significance and its contribution to the significance of the conservation area as a whole. The same principles apply in respect of other elements which make a positive contribution to the significance of the conservation area, such as open spaces".

Public benefit
An important aspect of the assessment of harm is the identification of public benefit to a proposal which would offset the harm identified. The PPG states (Para 020 Reference ID: 18a-020-20190723) "Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit".

Examples of heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting;
- reducing or removing risks to a heritage asset; or
- securing the optimum viable use of a heritage asset in support of its long-term conservation.
- Local planning policy: South Gloucestershire Local Plan Core Strategy (Adopted December 2013)

Local planning policy: Wiltshire Core Strategy Development Plan 2015

Core Policy 58: Ensuring the conservation of the historic environment
Development should protect, conserve and where possible enhance the historic environment.

Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including:

i. Nationally significant archaeological remains;
ii. World Heritage Sites within and adjacent to Wiltshire;
iii. Buildings and structures of special architectural or historic interest;
iv. The special character or appearance of Conservation Areas;
v. Historic Parks and Gardens; and
vi. Important landscapes, including registered battlefields and townscapes.

Distinctive elements of Wiltshire's historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible

enhanced. The potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping).

Heritage assets at risk will be monitored and development proposals that improve their condition will be encouraged. The advice of statutory and local consultees will be sought in consideration of such applications.

Guidance

This assessment has been carried out with reference to guidance documents produced by Historic England since 2008, and, where appropriate, in accordance with the Chartered Institute for Archaeologists' Standards and Guidance for Historic Environment Desk-Based Assessment (CIfA 2014), as set out below.

Historic Environment Good Practice Advice in Planning: Note 2 - Managing Significance in Decision-taking in the Historic Environment

The GPA note advises a 6-stage approach to the identification of the significance of a heritage asset and the potential effects on its significance resulting from any development.

The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest. A variety of terms are used in designation criteria (for example outstanding universal value for world heritage sites, national importance for Scheduled Monuments and special interest for Listed Buildings and Conservation Areas), but all of these refer to a heritage asset's significance.
The list of Steps is set out below, however the GPA does add "…it is good practice to check individual stages of this list, but they may not be appropriate in all cases and the level of detail applied should be proportionate. For example, where significance and/or impact are relatively low, as will be the case in many applications, only a few paragraphs of information might be needed, but if significance and impact are high then much more information may be necessary".

The recommended Steps are as follows:

1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change; and
6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

Regarding the application process, the GPA offers the following advice: "Understanding the nature of the significance is important to understanding the need for and best means of conservation. For example, a modern building of high architectural interest will have quite different sensitivities from an archaeological site where the interest arises from the possibility of gaining new understanding of the past.

Understanding the extent of that significance is also important because this can, among other things, lead to a better understanding of how adaptable the asset may be and therefore improve viability and the prospects for long term conservation.

Understanding the level of significance is important as it provides the essential guide to how the policies should be applied. This is intrinsic to decision-taking where there is unavoidable conflict with other planning objectives".

Regarding the assessment of the significance of a heritage asset, the GPA also states that the "...reason why society places a value on heritage assets beyond their mere utility has been explored at a more philosophical level by English Heritage in Conservation Principles (2008). Conservation Principles identifies four types of heritage value that an asset may hold: aesthetic, communal, historic and evidential value. This is simply another way of analysing its significance. Heritage values can help in deciding the most efficient and effective way of managing the heritage asset to sustain its overall value to society".

For the purposes of this assessment and in line with Conservation Principles, the assessment of significance will include an assessment of a heritage asset's communal value.

Historic Environment Good Practice Advice in Planning: Note 3 - The Setting of Heritage Assets

GPA note 3. expands on the six stages outlined in GPA Note 2, as set out above.

Step 1: identifying the heritage assets affected and their settings
The starting point of any assessment is the identification of those heritage assets likely to be affected by the proposed development. For this purpose, if the proposed development is seen to be capable of affecting the contribution of a heritage asset's setting to its significance or the appreciation of its significance, it can be considered as falling within the asset's setting.

Step 2: Assessing whether, how and to what degree these settings contribute to the significance of the heritage asset(s)
This Step provides a checklist of the potential attributes of a setting that it may be appropriate to consider defining its contribution to the asset's heritage values and significance. Only a limited selection of the possible attributes listed below is likely to be important in terms of any single asset.

The asset's physical surroundings

- Topography;
- Other heritage assets (including buildings, structures, landscapes, areas or archaeological remains);
- Definition, scale and 'grain' of surrounding streetscape, landscape and spaces;
- Formal design;
- Historic materials and surfaces;
- Land use;
- Green space, trees and vegetation;
- Openness, enclosure and boundaries;
- Functional relationships and communications;
- History and degree of change over time;
- Integrity; and
- Issues such as soil chemistry and hydrology.

Experience of the asset

- Surrounding landscape or townscape character;
- Views from, towards, through, across and including the asset;
- Visual dominance, prominence or role as focal point;
- Intentional intervisibility with other historic and natural features;
- Noise, vibration and other pollutants or nuisances;
- Tranquillity, remoteness, 'wildness';
- Sense of enclosure, seclusion, intimacy or privacy;
- Dynamism and activity;
- Accessibility, permeability and patterns of movement;
- Degree of interpretation or promotion to the public;
- The rarity of comparable survivals of setting;
- The asset's associative attributes;
- Associative relationships between heritage assets;
- Cultural associations;
- Celebrated artistic representations; and
- Traditions.

Step 3: Assessing the effect of the proposed development on the significance of the asset(s)
The third stage of the analysis is to identify the range of effects that any Proposed Development may have on setting(s), and to evaluate the resultant degree of harm or benefit to the significance of the heritage asset(s).

The following checklist sets out the potential attributes of any proposed development which may affect setting, and thus its implications for the significance of the heritage asset. Only a limited selection of these is likely to be particularly important in terms of development.

Location and siting of development

- Proximity to asset;
- Extent;
- Position in relation to landform;
- Degree to which location will physically or visually isolate asset; and
- Position in relation to key views.

The form and appearance of the development

- Prominence, dominance, or conspicuousness;
- Competition with or distraction from the asset;
- Dimensions, scale and massing;
- Proportions;
- Visual permeability (extent to which it can be seen through);
- Materials (texture, colour, reflectiveness, etc);
- Architectural style or design;
- Introduction of movement or activity; and
- Diurnal or seasonal change.

Other effects of the development

- Change to built surroundings and spaces;
- Change to skyline;
- Noise, odour, vibration, dust, etc.;

- Lighting effects and 'light spill';
- Change to general character (e.g. suburbanising or industrialising);
- Changes to public access, use or amenity;
- Changes to land use, land cover, tree cover;
- Changes to archaeological context, soil chemistry, or hydrology; and
- Changes to communications/accessibility/permeability.

Permanence of the development

- Anticipated lifetime/temporariness;
- Recurrence; and
- Reversibility.

Longer term or consequential effects of the development

- Changes to ownership arrangements;
- Economic and social viability; and
- Communal use and social viability.

Step 4: Maximising enhancement and minimising harm

Enhancement may be achieved by actions including:

- removing or re-modelling an intrusive building or feature;
- replacement of a detrimental feature by a new and more harmonious one;
- restoring or revealing a lost historic feature or view;
- introducing a wholly new feature that adds to the public appreciation of the asset;
- introducing new views (including glimpses or better framed views) that add to the public experience of the asset; or
- improving public access to, or interpretation of, the asset including its setting

Options for reducing the harm arising from development may include the relocation of a development or its elements, changes to its design, the creation of effective long-term visual or acoustic screening, or management measures secured by planning conditions or legal agreements.

Step 5: Making and documenting the decision and monitoring outcomes

Step 5 identifies the desirability of making and documenting the decision-making process and monitoring outcomes.

For the purposes of this assessment Stages 1 to 3 have been followed, with Stage 4 forming, if/where appropriate, part of the recommendations.

Chartered Institute for Archaeologists: Standard and guidance for historic environment desk-based assessment (published December 2014; updated January 2017; updated October 2020)

This heritage statement has also been completed in line with guidance issued by the Chartered Institute for Archaeologists (CIfA). Armour Heritage is enrolled with the CIfA as a corporate entity and is recognised as a CIfA Registered Organisation.

This document has been completed in line with the CIfA Standard, as set out in the aforementioned document, which states: "Desk-based assessment will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area. Desk-based assessment will be undertaken using appropriate methods and practices which satisfy the stated aims of the project, and which comply with the Code of conduct and other relevant

regulations of CIfA. In a development context desk-based assessment will establish the impact of the proposed development on the significance of the historic environment (or will identify the need for further evaluation to do so) and will enable reasoned proposals and decisions to be made whether to mitigate, offset or accept without further intervention that impact".

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