

Cleve Rocks
46 Midford Lane
Limpley Stoke
Wiltshire BA2 7DF

Proposed
Replacement Dwelling

Archaeological Impact
Assessment

Project Ref. AH2457

March 2026



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Bath and North East Somerset
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1. NON-TECHNICAL SUMMARY

Project Name:	Cleve Rocks
Planning proposal:	Proposed Replacement Dwelling
Location:	46 Midford Lane, Limpley Stoke, Bath and North East Somerset BA2 7DF
NGR:	377216, 161176
Type:	Archaeological Impact Assessment

This archaeological impact assessment (AIA) has been completed in respect of proposals for the demolition of the existing buildings at Cleve Rocks, 46 Midford Lane, Limpley Stoke, and the construction of a replacement dwelling.

The assessment has considered the known archaeological and historical background of the Site and its surrounding area using information derived from the Wiltshire and Swindon and Bath and North East Somerset Historic Environment Records (HERs), historic mapping, LiDAR data and the results of previous archaeological investigation. A walkover survey of the Site was also undertaken.

Evidence indicates that the Site contains the remains of a Romano-British occupation site, identified through excavations undertaken in the early 20th century, which recorded structural remains and a substantial assemblage of artefactual material. The site has been interpreted as a possible villa, indicating a relatively high status rural settlement. As the extent of these remains is not fully understood, there is a high potential for further associated archaeological deposits to survive within the Site.

Evidence for other periods is comparatively limited, although the wider landscape demonstrates intermittent activity from the prehistoric period onwards. Historic mapping indicates that the Site formed part of a wooded landscape that was progressively cleared and brought into agricultural use during the post-medieval period.

Given the identified high potential for Romano-British remains, the proposed development has the potential to affect buried archaeological deposits where present. However, such impacts are likely to be localised and can be appropriately managed through further consultation with the County Archaeological Officer.

Overall, while the Site contains archaeological remains of potential local to regional significance, it is considered that the proposed development could proceed subject to appropriate archaeological mitigation.

2. INTRODUCTION

Outline

- 2.1. This archaeological impact assessment (AIA) has been completed in respect of a proposal for the demolition of the existing bungalow at Cleve Rocks, 46 Midford Lane, Limpley Stoke, and the construction of a replacement dwelling. The area proposed for redevelopment is centred on NGR 377216, 161176, and is referred to hereafter as ‘the Site’ (Image 1).

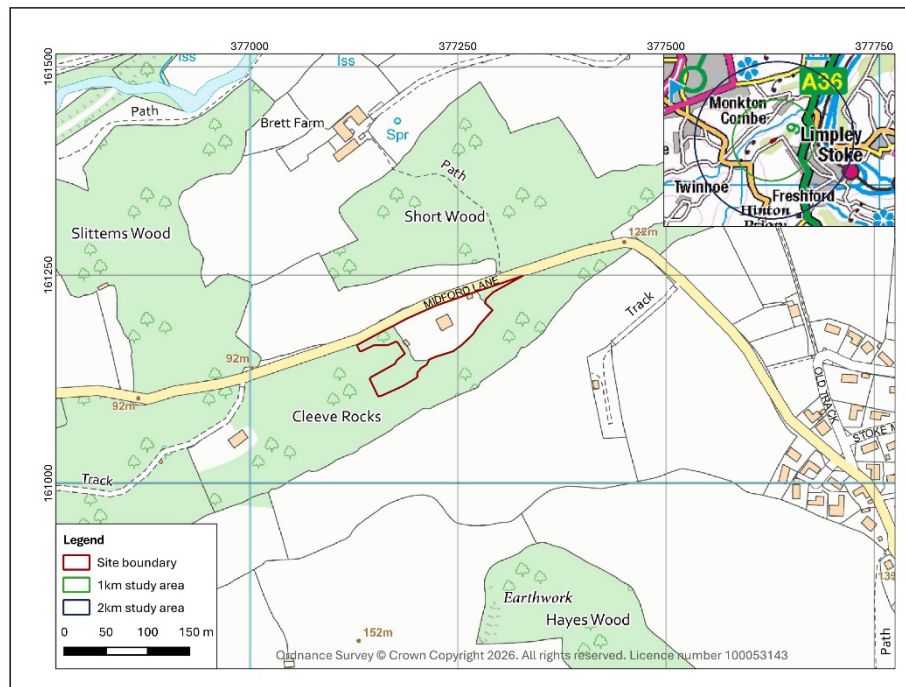


Image 1: Site location plan



Image 2: Aerial view of Site

- 2.2. The Site lies to the south of Midford Lane and comprises an existing bungalow, known as ‘Cleve Rocks’, a second domestic building and a small number of outbuildings including

a garage. It is surrounded by a landscaped garden which includes a pond, which is itself surrounded by mature tree growth.

Topography and geology

- 2.3. The Site rises quite sharply from north to south, lying at elevations of between c. 114m and 130m OD.
- 2.4. The underlying bedrock geology of the majority Site recorded by the British Geological Survey (BGS) is recorded as Fuller's Earth Formation - Mudstone; a sedimentary bedrock formed between 168.3 and 166.1 million years BP.
- 2.5. The higher elevations in the south of the Site are recorded as Chalfield Oolite Formation - Limestone; a sedimentary bedrock formed between 168.3 and 166.1 million years BP.
- 2.6. No superficial geological deposits are recorded.

Assessment aims

- 2.7. It should be noted that this assessment relates to the potential for the Site contain as yet undiscovered archaeological remains. Issues of built heritage are not covered in this report but are presented in a separate heritage statement.
- 2.8. The specific aims of this archaeological impact assessment are:
 - an assessment of previous impacts at the Site; and
 - an assessment of the potential for the Site to contain as yet undiscovered archaeological remains.

Limitations of data

- 2.9. 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 and the Bath and North East Somerset Historic Environment Records (HERs), 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.
- 2.10. It is recognised that the HER does not comprise a record of all surviving elements of the historic environment resource in the area, representing instead a record of the discovery of a wide range of archaeological and historical components in the two 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.

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3. ARCHAEOLOGICAL AND HISTORICAL CONTEXT

Walkover survey

- 3.1. A site visit was undertaken on 03 March 2026 where the Site was walked over and visible evidence assessed to identify any evidence for buried or upstanding archaeological features.
- 3.2. The Site had clearly been landscaped in places, with two areas clearly having been levelled for buildings (Image 3-4).



Image 3: Cleeve Rocks – the principal dwelling at the Site

- 3.3. No artefactual evidence of potential archaeological interest was identified in areas where topsoil was exposed, and no upstanding features were noted which may have resulted from human activity.
- 3.4. Other observations made in terms of visual and spatial relationships between the Site and designated heritage assets, and their settings, were also noted and the results of these have informed a heritage statement which will also form part of the planning application information (Armour Heritage 2025).



Image 4: Secondary building, west of Cleeve Rocks

Statutory and local heritage designations

- 3.5. An arbitrary 1km study area was established measured from the Site boundary, to better quantify and assess the levels of known archaeological and historical activity within its wider environs.

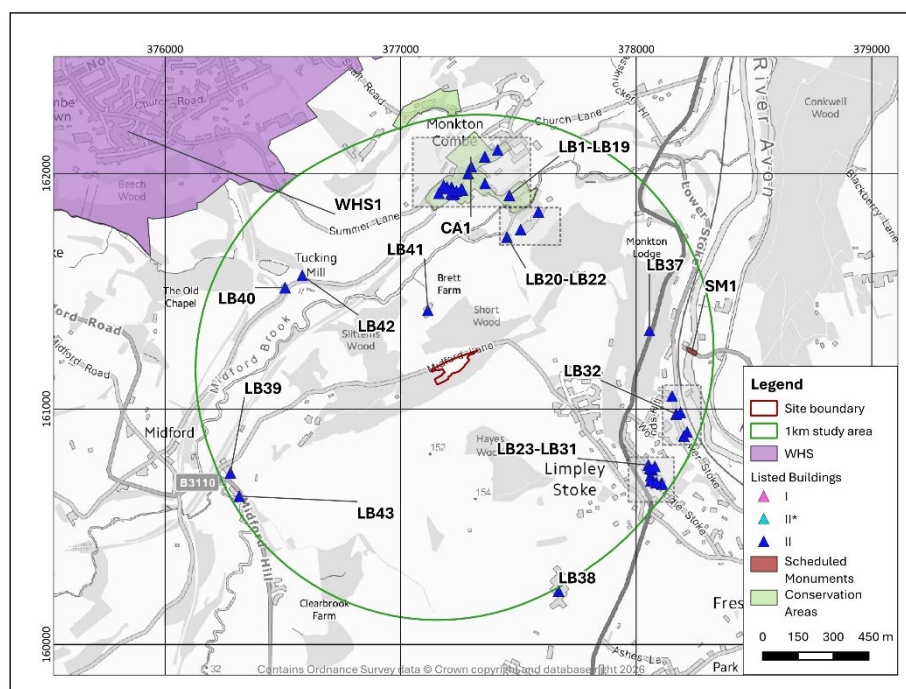


Image 5: Distribution of designated heritage assets in study area

- 3.6. Whilst this report is concerned solely with the Site's archaeological potential, the date, type and distribution of nationally and locally Listed Buildings and other designated heritage assets may serve to inform as to historic land use and ownership, which in turn may contribute to an understanding of the Site's potential for as yet unidentified buried archaeological features.

- 3.7. The study area includes 43 Listed Buildings and one Scheduled Monument comprising Limpley Stoke Bridge (or Stokeford Bridge), situated c. 890m east of the Site (Image 5, SM1).
- 3.8. The boundary of the Monkton Combe Conservation Areas is situated some 640m north of the Site (Image 5, CA1), whilst the City of Bath World Heritage Site boundary lies at its closest, c. 1km to the northwest (Image 5, WHS1).
- 3.9. A locally designated Park and Graden comprising the grounds of Midford Castle is recorded some 845m to the west of the Site (Image 6, LPG1).



Image 6: Location of Midford Castle locally listed park and garden

Archaeological and historical context

Previous studies

- 3.10. A total of 13 archaeological and/or heritage related projects, referred to as ‘events’, are recorded in the two HERs.
- 3.11. Situated within the Site boundary is the location of archaeological excavations carried out in 1911-14 and 1921-23 (Image 7, EV1). This Romano-British settlement site is discussed in more detail in the Romano-British section below.
- 3.12. Where the results of other archaeological and heritage surveys in the study are considered relevant to the assessment of the Site’s archaeological potential, they will also be discussed further in the sections below.

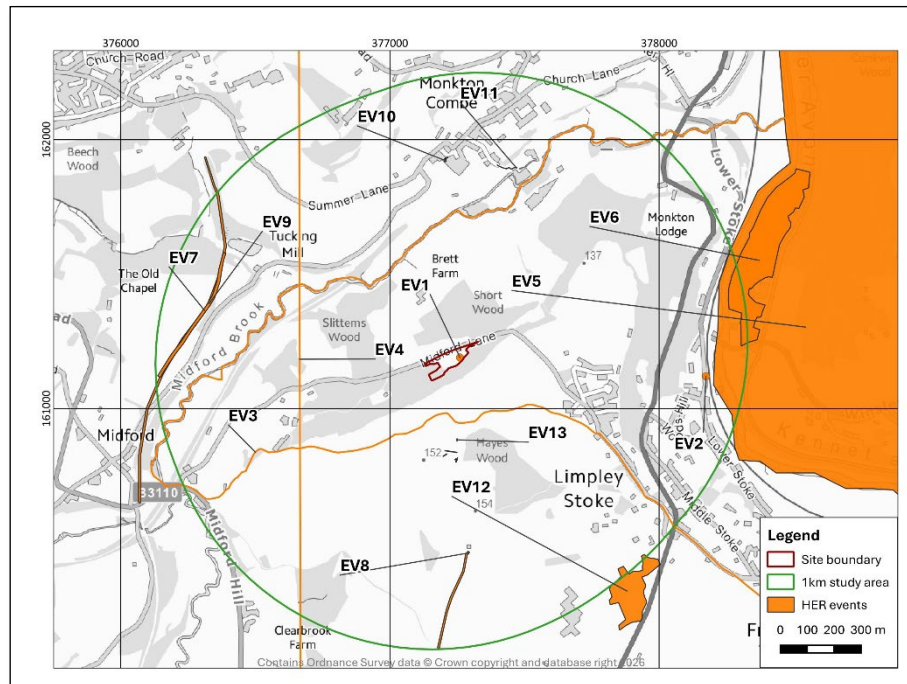


Image 7: Distribution of events in study area

Prehistoric (pre-43CE)

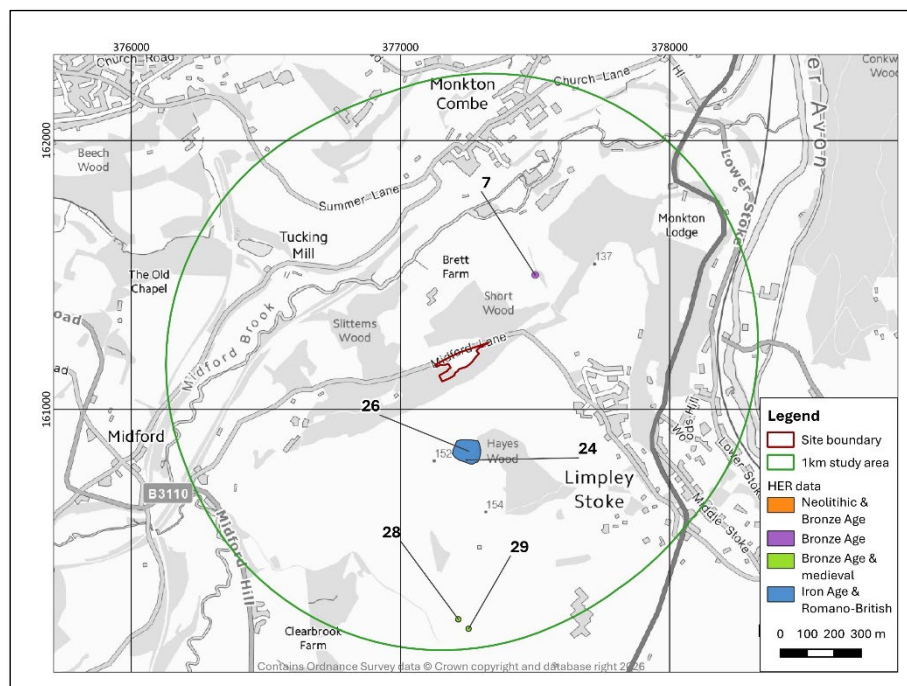


Image 8: Distribution of prehistoric evidence in study area

- 3.13. The earliest archaeological information recorded in the HER for the study area refers to the Neolithic to Bronze Age period, where a group of worked flints including four flint scrapers was recovered from an area outside Hayes Wood, c. 310m south of the Site (Image 8, 24).
- 3.14. The HER records the findspot of a Bronze Age spearhead located some 290m northeast of the Site (Image 8, 7), whilst two mounds south of the Site may represent either Bronze Age barrows or possibly medieval pillow mounds (Image 9; 28, 29).

- 3.15. The Hayes Wood Enclosure lies c. 250m south of the Site (Image 9, 26). The enclosure is described as a “roughly quadrilateral shaped enclosure, with rounded corners, an external bank and presumed single entrance on the east side at Hayes Wood” (HER entry). Archaeological investigations in 1934 suggested an Iron Age occupation site, although Romano-British pottery was also recovered (Stone & Wicks 1935).
- 3.16. Given the quite limited local background data, the potential for prehistoric remains to survive at the Site is considered low.

Romano-British (43CE-410CE)

- 3.17. Three sherds of pottery reported to have been recovered from land some 145m east of Field 8 'during the war' were identified as of Roman origin (Image 8, 17). The finds have not been verified.

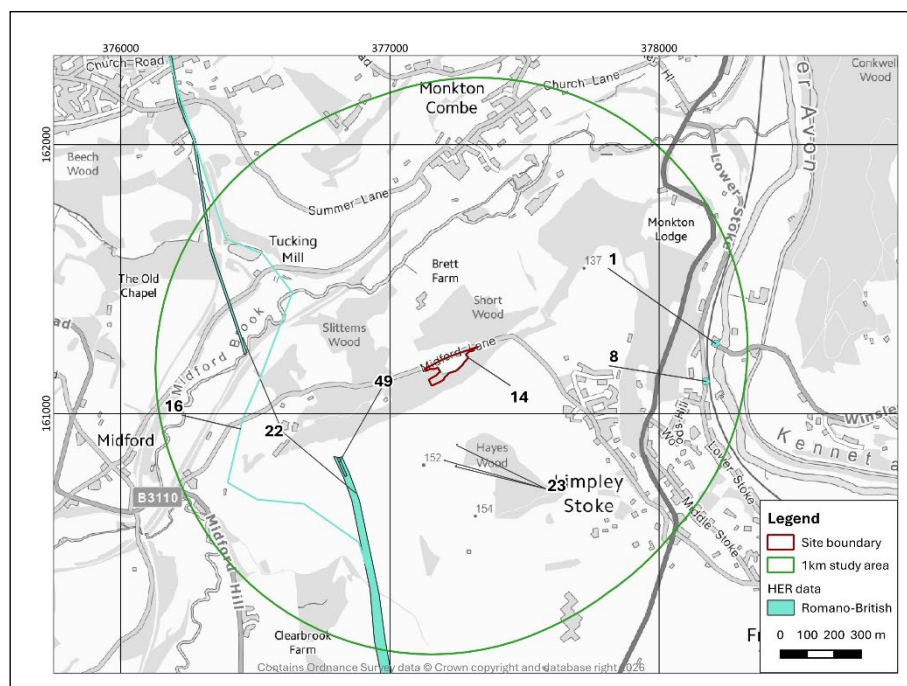


Image 9: Distribution of Romano-British evidence in study area

- 3.18. Of most significance is the Romano-British occupation area excavation in the earlier 20th century within the Site (Image 9, 14). Finds across the two periods of excavation recorded the remains of at least one building with over 4,000 sherds of pottery and numerous other finds recovered (Wicks 1923). The excavations were undertaken in a ‘level area, now garden’, most likely the area of lawn depicted in the foreground of Image 4. The site was described by D.P. Dobson as a villa (Dobson 1931).
- 3.19. Two sections of the Roman road from Bathwick to Poole have been tentatively identified west of the Site (Image 9; 22). A second speculative Roman road route is recorded in the same area (Image 9, 16), comprising conjectural routes of the road from Bath to Kingston Deverill.
- 3.20. A wall section of projected Roman date was identified during excavations for a gas pipe west of the Avon Bridge (Image 9, 1; Scott 1993) although in reality the wall has not been securely dated.

- 3.21. A short distance south of the wall two partial inhumations were recorded (Image 9, 8), although again these were not securely dated, with the Roman date inferred.
- 3.22. Further pottery of Romano-British origin has been recovered from an area c. 260m south of the Site (Image 9, 23), found during the Hayes Wood Enclosure excavations (Stone & Wicks 1935).
- 3.23. The evidence for Romano-British activity at the Site, likely associated with a villa, indicates a clearly high potential for further material of this period to survive there.

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

- 3.24. A settlement at nearby Limpley Stoke is first recorded in 1263 as *Hangyndestok* with the place name deriving from the Old English word *hangende* meaning ‘hanging’, referring to its position below the steep hillside. The settlement is known as Stoke by 1333 while ‘Limpley’ is first recorded in 1585 (as *Lymply*), associated with the dedication of a chapel known as ‘Our Lady of Limpley’s Chapel’ (Mills 2003).

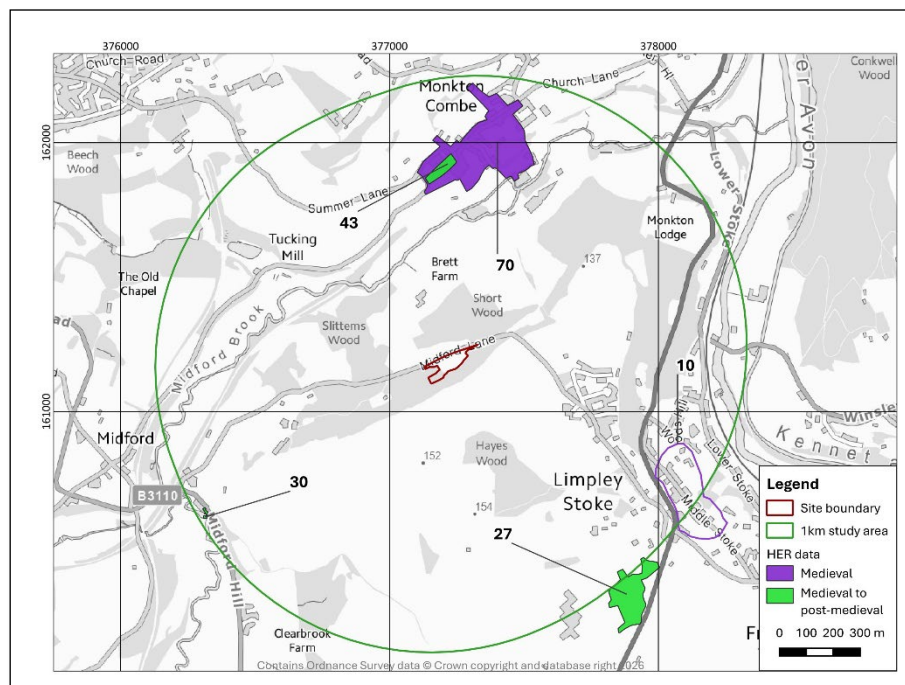


Image 10: Distribution of medieval and post medieval evidence in study area

- 3.25. The HER records a small number of sites and monuments in the study area relating to the medieval period, including the medieval settlement of Monkton Combe north of the Site (Image 10, 70).
- 3.26. Within Monkton Combe, St. Michael's Church and churchyard is identified as a 19th century foundation (Image 10, 43). Although it has been suggested that an origin Norman church historically occupied the site, an archaeological watching brief maintained in 2014 identified no remains of medieval date (Martin 2014).
- 3.27. The remains of the Woodwick deserted village lie some 960m southeast of the Site (Image 10, 27). An assemblage of 16th and 17th century pottery was identified at the site during works associated with A36 road improvements (Iles 1977).

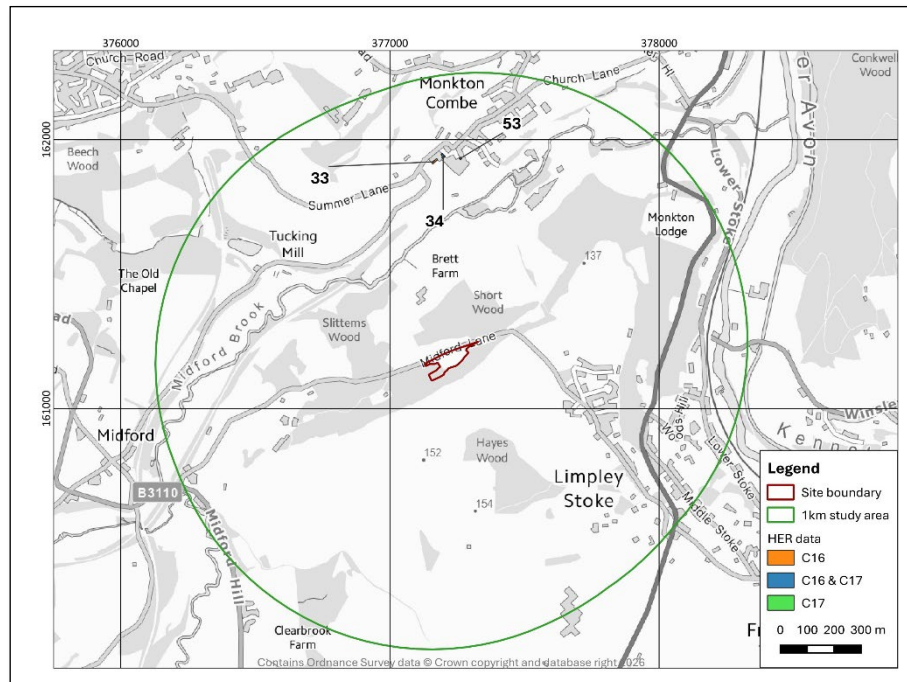


Image 11: Distribution of 16th and 17th century evidence in study area

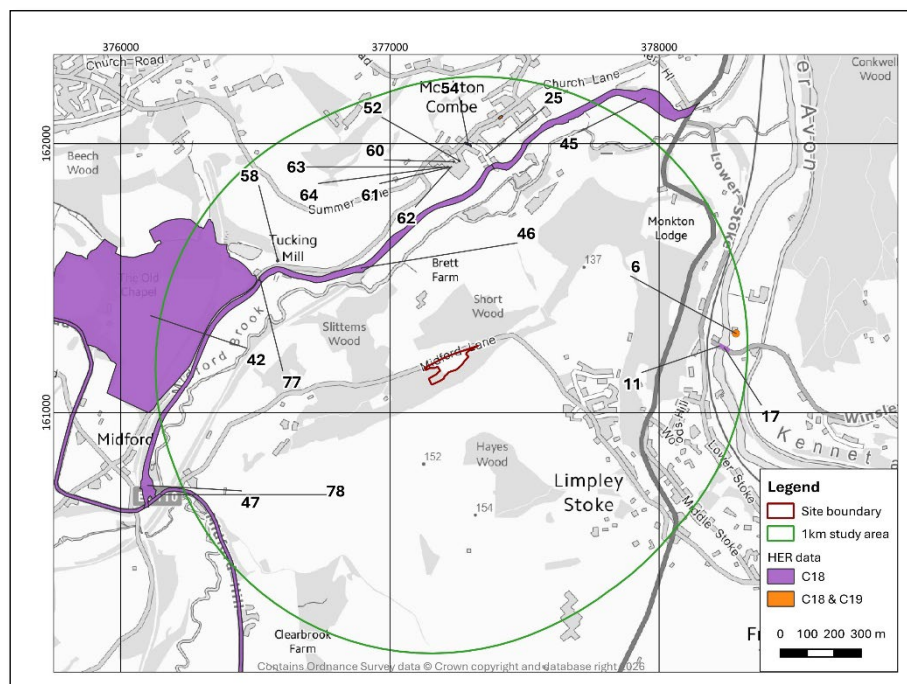


Image 12: Distribution of 18th century evidence in study area

- 3.28. Three buildings of 16th and 17th century date are recorded at Monkton Combe (Image 11; 33, 34, 53), whilst significantly more data is held relating to the 18th century (Image 12). This includes the Somerset Coal canal (Image 12; 45-47), a waterway constructed to carry coal from the Somerset coalfields (around Radstock and Paulton) to the city of Bath, where it connected with the Kennet and Avon Canal at Dundas (Clew 1970).
- 3.29. Further infrastructure improvement is evident in the construction of the 18th century turnpike road from Odd Down to Hinton Charterhouse (Image 12, 78), often known as the

“Black Dog Turnpike”, whilst to the east the (now Scheduled) Limpley Stoke Bridge dates to the 18th century, although an earlier structure is recorded (Image 12, 17).

- 3.30. To the west, Midford Castle dates to the 18th century and includes a woodland garden set out in 1775 (Image 12, 42).

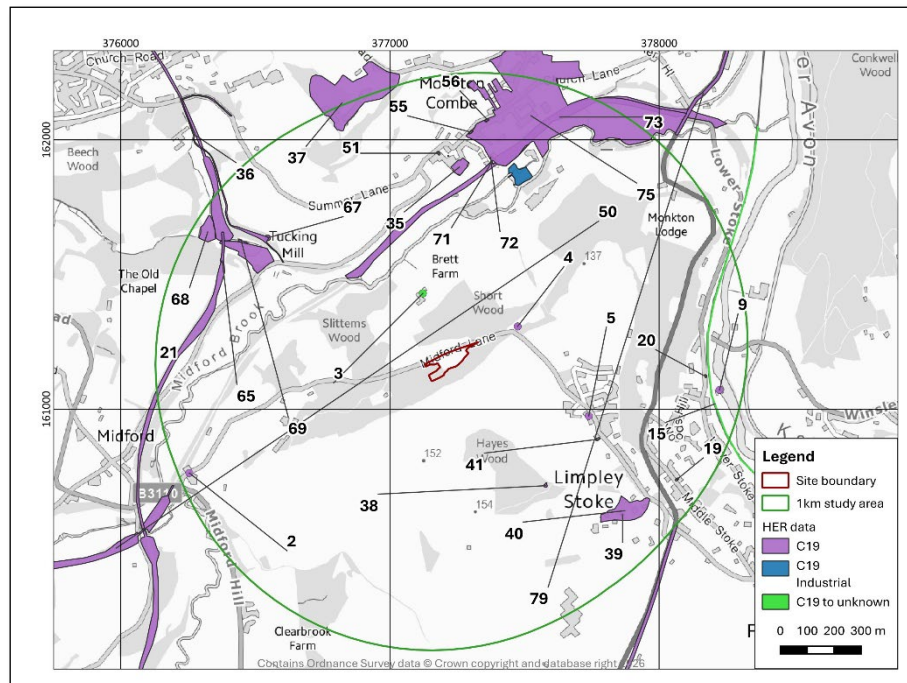


Image 13: Distribution of 19th century evidence in study area

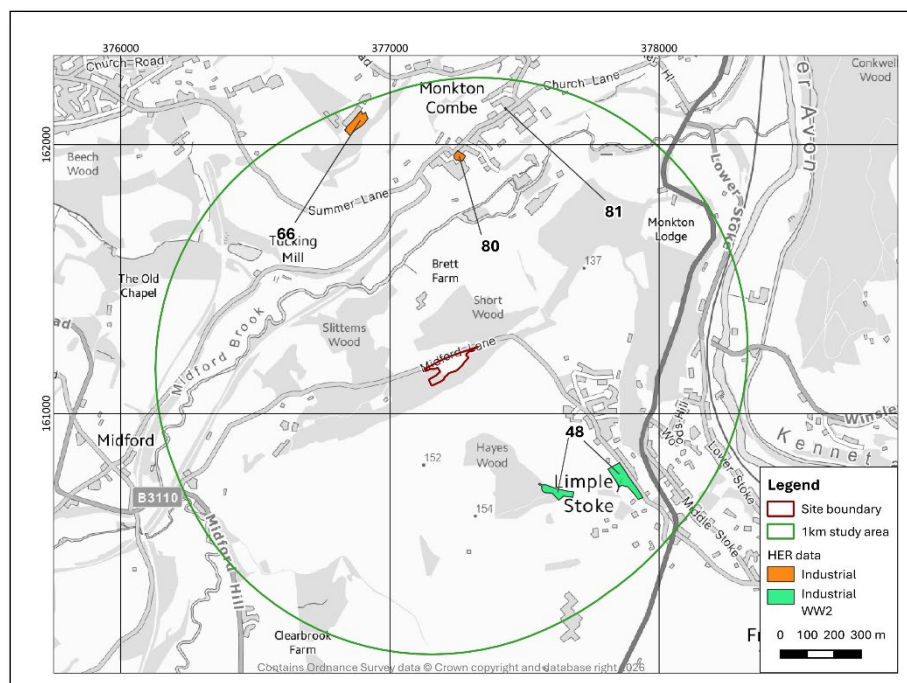


Image 14: Distribution of industrial evidence in study area

- 3.31. The 19th century saw more improvements to local infrastructure with the foundation of the Camerton to Limpley Stoke branch line, part of the Bristol and North Somerset

Railway (Image 13, 50), and the Bath to Evercreech line of the Somerset and Dorset Joint Railway (Image 13, 21).

- 3.32. Reason recorded by the HER as 'Industrial' in the study area include Monkton Combe Mill (Image 14, 31), which remains extant though disused and derelict.
- 3.33. It is considered that the potential for medieval and post medieval remains to be recorded at the Site is low to moderate.

Modern period (1900 to present)

- 3.34. Modern features considered to be of archaeological and historical interest in the study area include Monkton Combe Junior School (Image 15, 76), purpose built in 1907. Further building in Monkton Combe are also recorded.

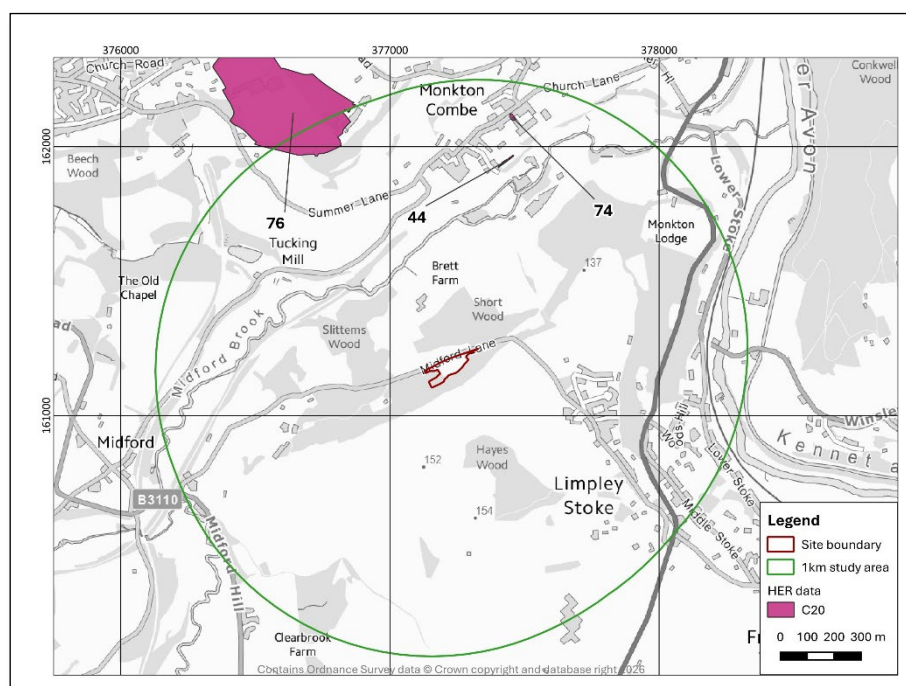


Image 15: Distribution of modern period evidence in study area

- 3.35. The potential for significant modern features or artefacts, or undated material at the Site is considered low to moderate, with any material present likely to be of limited archaeological value.

Undated evidence

- 3.36. A group of undated lynchets are evident some 725m west of the Site (Image 16, 12), purpose built in 1907. Further building in Monkton Combe are also recorded. The features have been identified from aerial photographs. Further lynchets are recorded c. 390m north of the Site (Image 16; 13, 18).
- 3.37. The potential for significant undated material at the Site is considered low, with any features or material present likely to be of limited archaeological value.

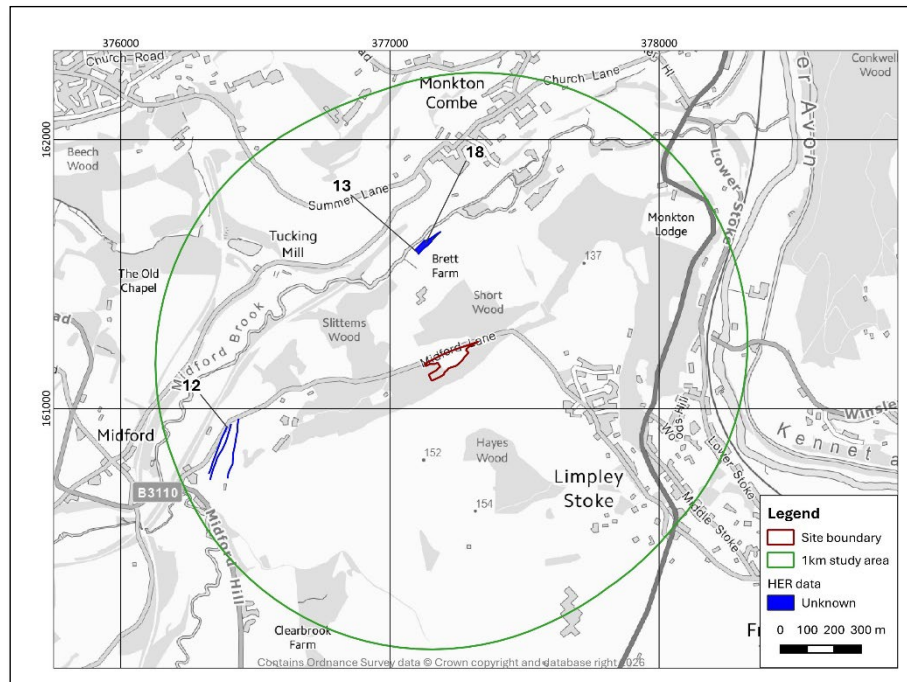


Image 16: Distribution of undated evidence in study area

LiDAR data

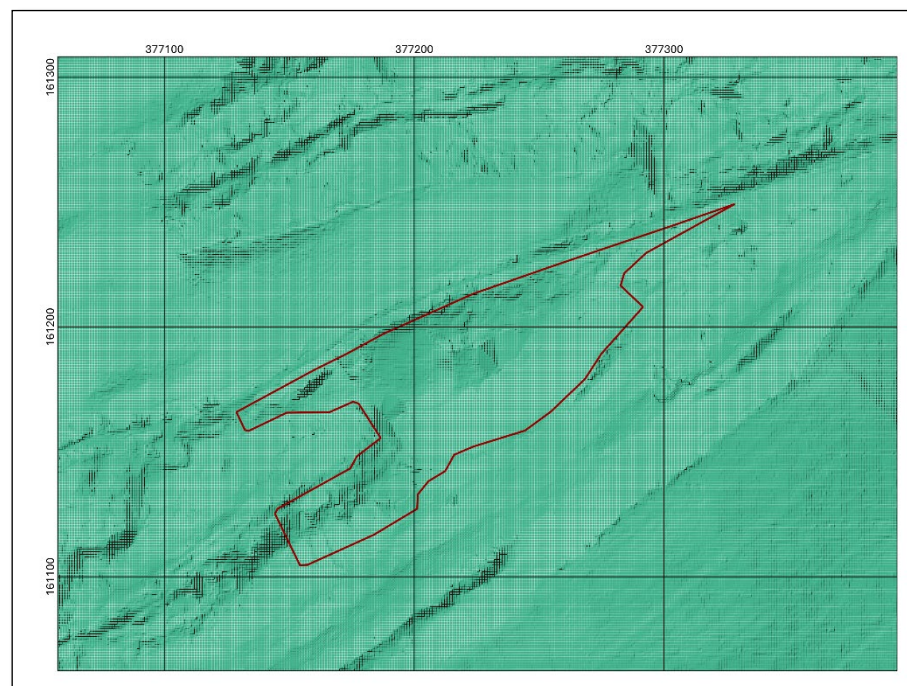


Image 17: LiDAR data

- 3.38. LiDAR data shows little or no evidence for the previously excavated Roman remains, or indeed the excavation areas. The extant house is just visible in the centre of the Site.

Historic map regression: the developmental history of the Site and its environs

- 3.39. 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, streetscape or possibly lost to development or boundary change.

1808 Edmund Crocker - Frome (OSD 59)

- 3.40. Edmund Crocker's 1808 map represents one of the first group of Ordnance Survey drawings produced for the military. The map illustrates the Site as within a swathe of woodland with no development evident.

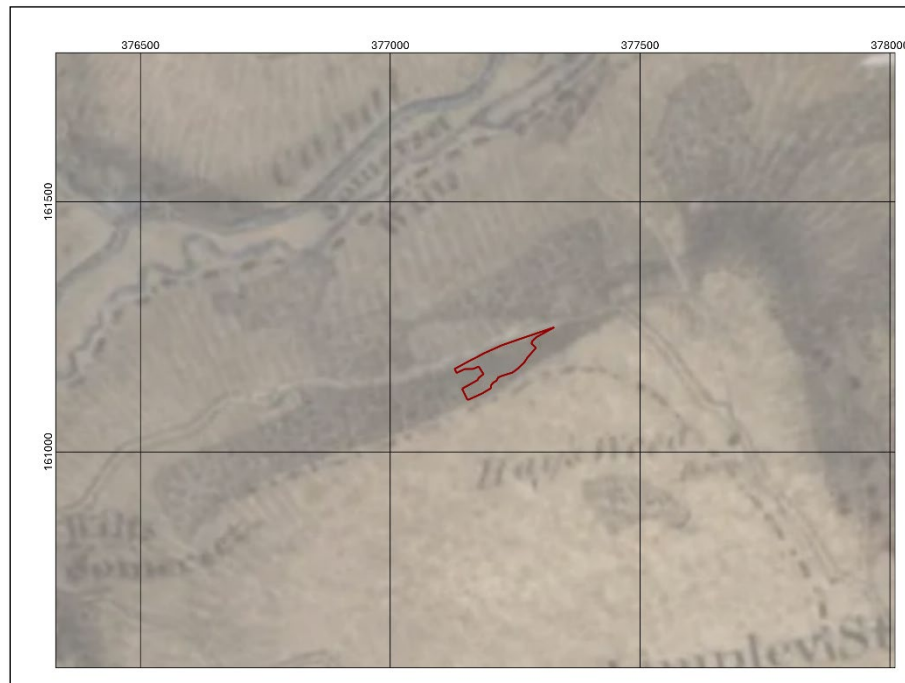


Image 18: 1808 Edmund Crocker - Frome (OSD 59)

1840 Bradford-On-Avon parish tithe map

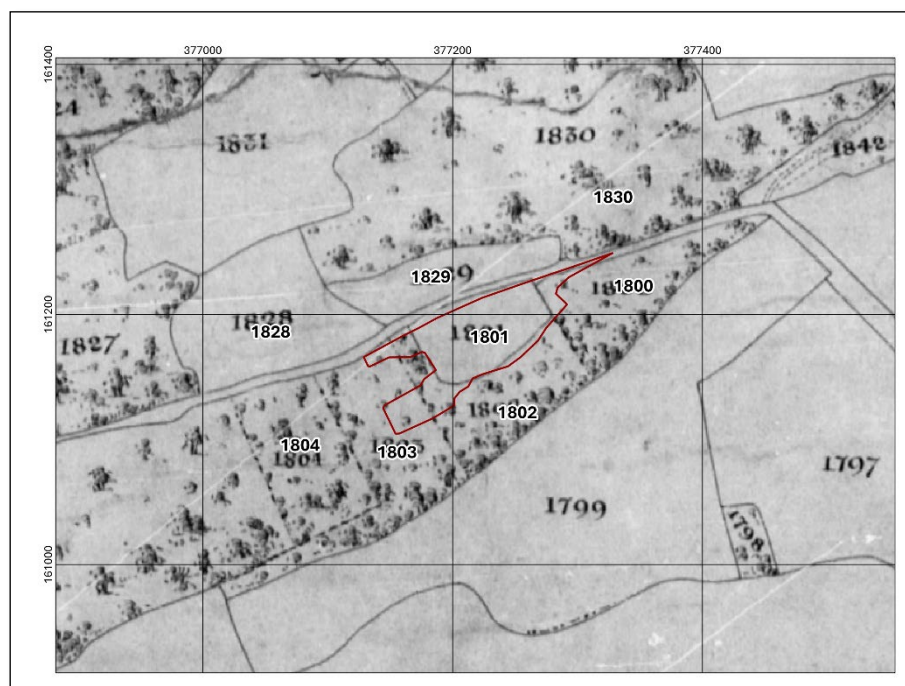


Image 19: 1840 Bradford-On-Avon parish tithe map

- 3.41. The tithe map for the parish of Bradford-On-Avon was completed in 1841 by G.C. Ashmead, Bristol, with the apportionment compiled in the following year (Kain and Oliver 1995).
- 3.42. The Site includes Plot 1801 and parts of several surrounding plots. Information on these, alongside other tithed plots in proximity to the Site, is presented in Table 1 below. Field/plot name interpretation is generally after Cavill 2018 or further research.

Table 1: 1841 Bradford-On-Avon parish tithe map apportionment

Plot	Plot Name	Landowner	Land Use	Interpretation
1801	Twink Leaze	George Penruddock	Arable	'Twink' possibly meaning glinting – may refer to a spring
1800	Part of Upper Cleave	Robert Cooper	Wood	Name of locale
1802	Part of Upper Cleeves	Mrs Maria Joyce, Lessee Of The Rectorial Glebe; Reverend James Harrington Evans	Wood	As 1800 (although spelling altered)
1803	Part of Upper Cleave	Robert Cooper	Wood	As 1800
1804	Part of Upper Cliff	George Penruddock	Wood	Named for local geology
1828	Rough Breach	Mrs Maria Joyce, Lessee Of The Rectorial Glebe; Reverend James Harrington Evans	Arable	Poor quality land recently brought into cultivation
1829	Little Twink Leaze	Henry Toogood Davis	Arable	As 1801; smaller plot
1830	Shortwood	Henry Toogood Davis	Wood	small or coppiced wood

- 3.43. The principal landowner of the Site, who owned the central deforested portion, was George Penruddock. The Penruddock family were associated with Compton Chamberlayne, where they held the manor and estate, centred on Compton Park, from the 16th century onwards.

1883-84 Ordnance Survey County Series 1:2,500

- 3.44. This first edition Ordnance Survey map illustrates the Site in a similar condition to that shown in the preceding tithe map.

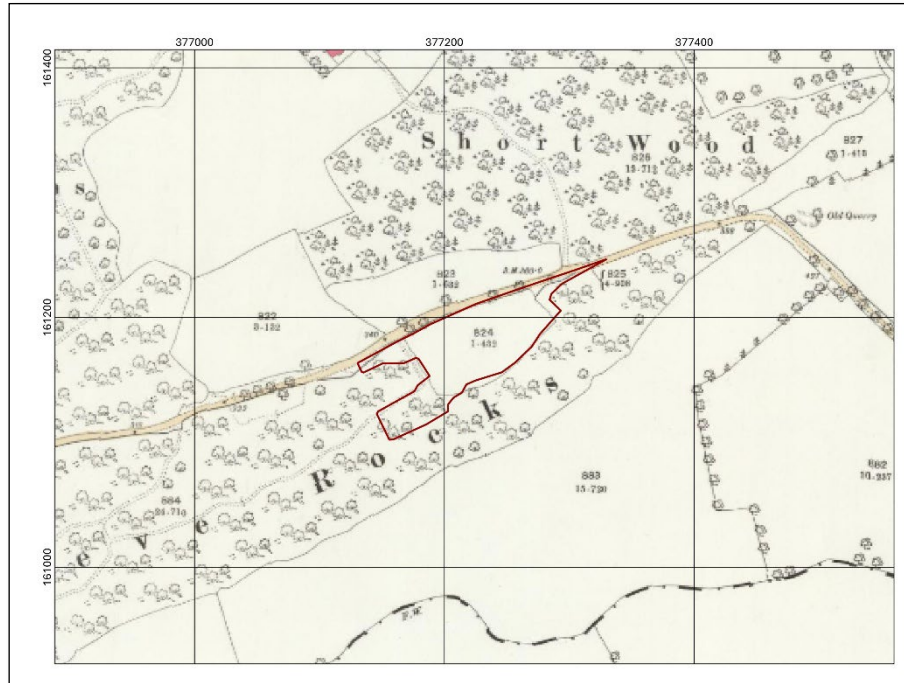


Image 20: 1883-84 Ordnance Survey County Series 1:2,500

1886 Ordnance Survey County Series 1:2,500

3.45. The 1889 OS map shows no significant changes in the field layout since the first edition.

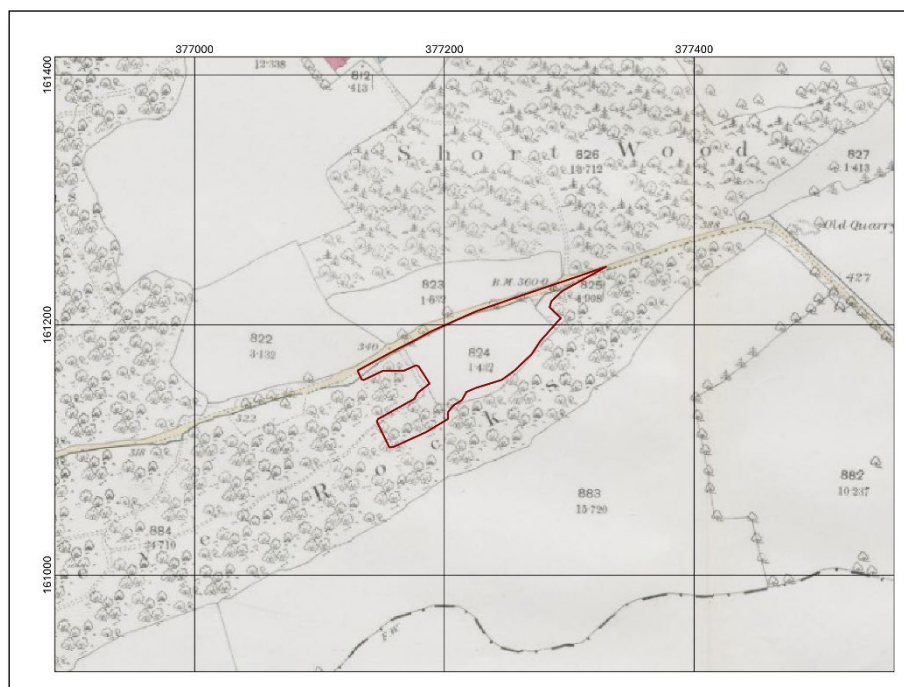


Image 21: 1886 Ordnance Survey County Series 1:2,500

1901 Ordnance Survey County Series 1:2,500

3.46. Once again, the Site appears largely as illustrated in the previous OS map.

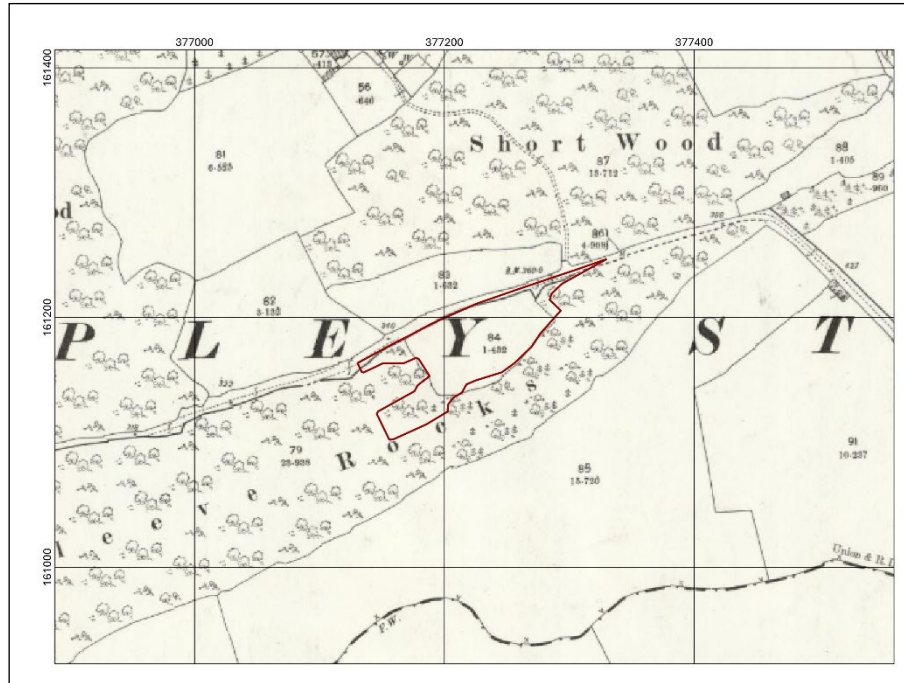


Image 22: 1901 Ordnance Survey County Series 1:2,500

1922 Ordnance Survey County Series 1:2,500

3.47. No changes at the Site or nearby of any significance appear in the 1922 map.

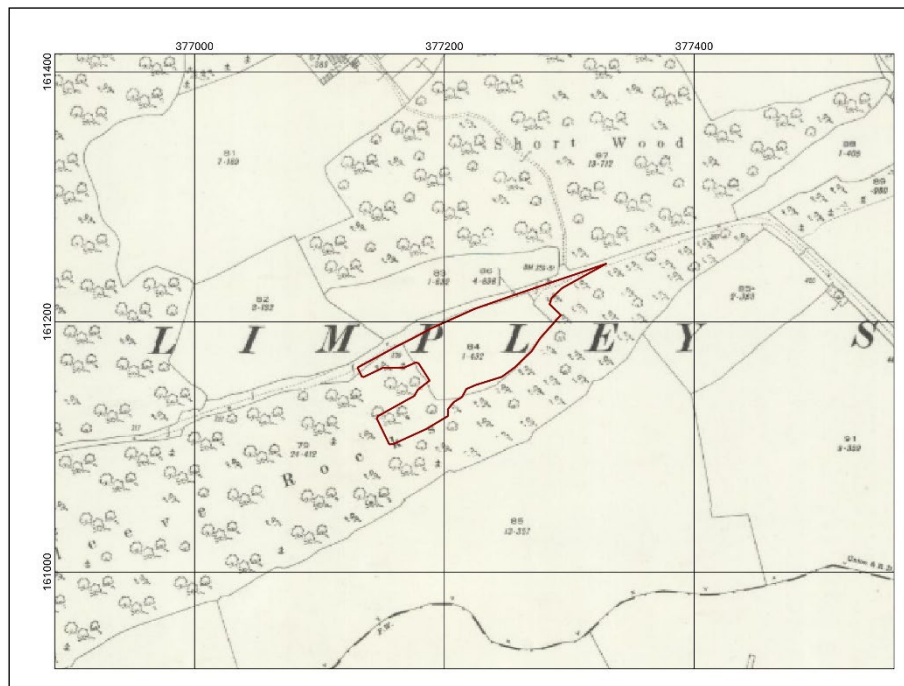


Image 23: 1922 Ordnance Survey County Series 1:2,500

1952 Ordnance Survey Plan 1:10,560

3.48. By 1952, a small building is illustrated in the central part of the Site with a second to the east. A land division is also evident running broadly northeast-southwest which may represent a terrace created to facilitate the construction of the buildings.

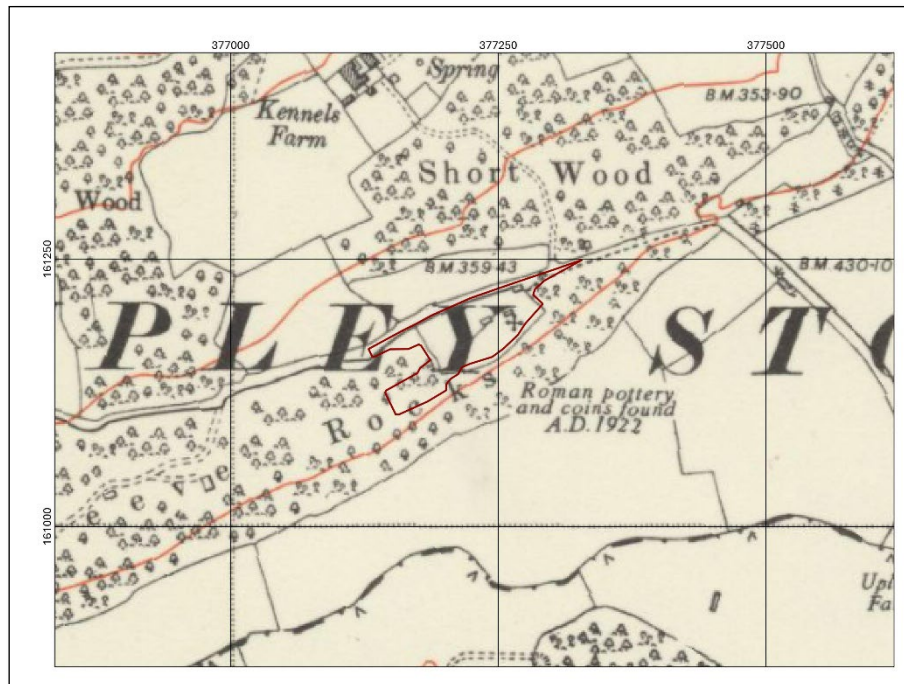


Image 24: 1952 Ordnance Survey Plan 1:10,560

1969 Ordnance Survey Plan 1:2,500

- 3.49. The 1969 map shows the buildings in more detail, with two further outbuildings to the west.

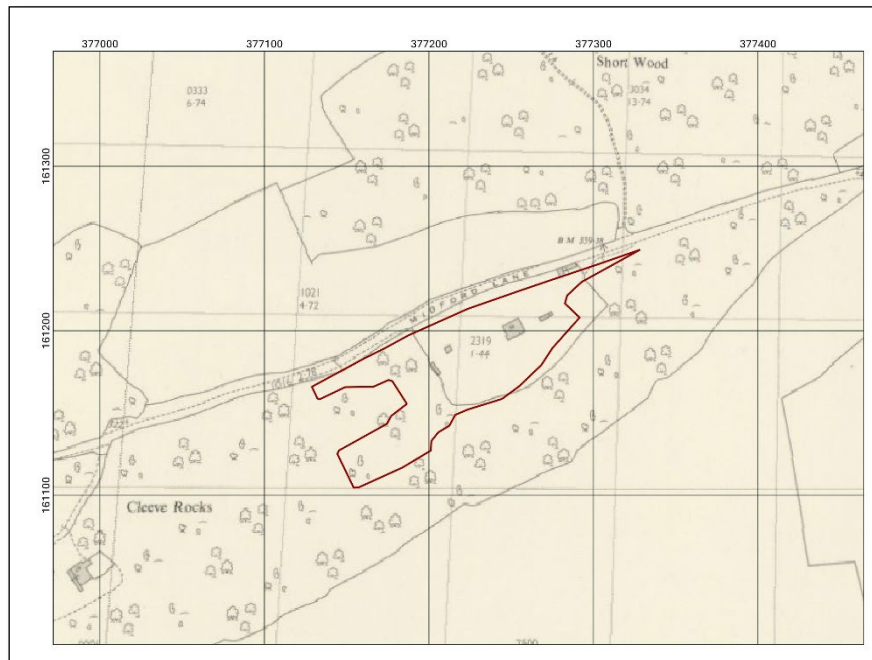


Image 25: 1969 Ordnance Survey Plan 1:2,500

Satellite imagery

- 3.50. The Google Earth satellite image sequence runs from 1999 to 2025. The main building at the Site are just visible in the 1999 image, as is the pool west of the dwelling. The western building is not evident until 2021.

Historic Landscape Character

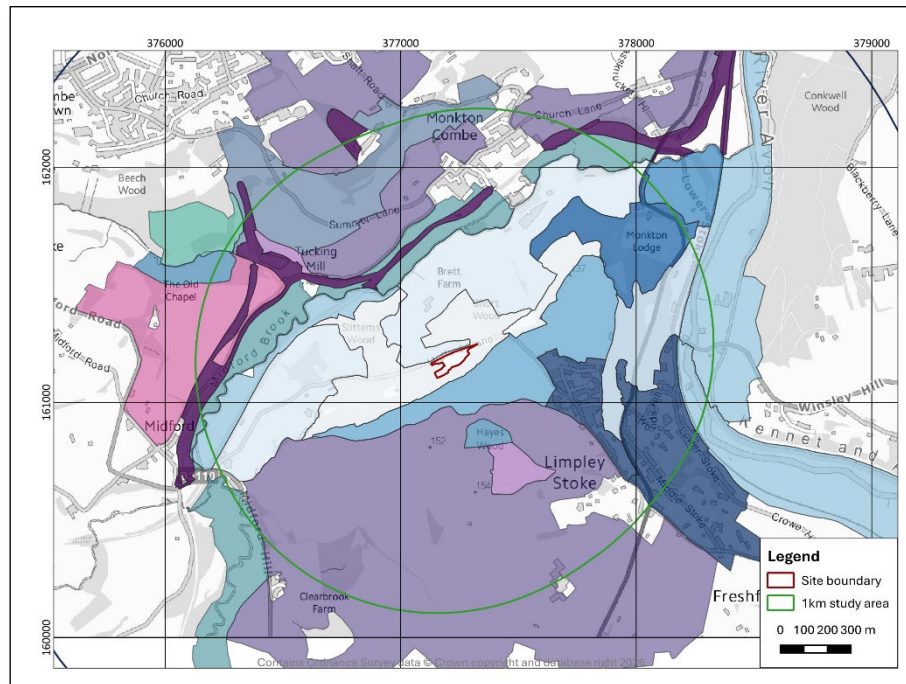


Image 26: Historic Landscape Character

- 3.51. The Wiltshire Historic Landscape Characterisation identifies the Site as lying within a landscape type defined as *Ancient semi-natural woodland*, summarised “These wooded area are marked as semi-natural ancient woodland on the Natural England Inventory. They are depicted on both the 1 ed OS maps and so were well established by the C19. The wood may have been subject to assarting in the past”.

4. ASSESSMENT OF SIGNIFICANCE

Buried archaeology

HER datasets

- 4.1. A high potential for buried archaeological remains has been identified at the Site based on the evidence held by the HERs, historic mapping, LiDAR data and the results of earlier archaeological investigation.
- 4.2. Of particular significance is the Romano-British occupation site identified within the Site boundary, investigated during excavations undertaken in the early 20th century. These works recorded the remains of at least one structure alongside a substantial assemblage of material, including over 4,000 sherds of pottery and a range of associated finds (Wicks 1923). The site has been interpreted as a possible villa (Dobson 1931), indicating the likelihood of a high status rural settlement.
- 4.3. While the excavations confirmed the presence of significant Roman period remains within the Site, they were undertaken to early archaeological standards and are unlikely to have fully defined either the extent or character of the settlement. The recorded excavations appear to have been confined to a relatively limited area, now forming part of the landscaped garden, and it is therefore probable that additional remains, associated features (such as enclosures, ancillary buildings or agricultural features), and artefactual material survive elsewhere within the Site.

- 4.4. The presence of tentatively identified Roman road alignments in close proximity to the Site, together with additional finds of Romano-British pottery and possible structural and funerary remains within the wider study area, further reinforces the interpretation of this locality as an area of focused Roman period activity, not unexpected given its proximity to Bath (Aquae Sulis). Taken together, this evidence indicates that the Site formed part of a settled and organised Romano-British landscape, increasing the likelihood that further remains of this period survive within the Site boundary.
- 4.5. In contrast, evidence for prehistoric activity within the study area is limited to isolated finds and possible features of uncertain character, suggesting a low potential for significant prehistoric remains within the Site. Similarly, evidence for early medieval and medieval activity is largely confined to nearby settlements, with no direct evidence for occupation within the Site itself. However, the Site's location within a rural agricultural landscape indicates some potential for agricultural features of medieval or later date, such as former field boundaries or cultivation remains, to survive at low density.
- 4.6. Historic mapping demonstrates that the Site formed part of a wooded and subsequently cleared agricultural landscape, with areas of woodland progressively brought into cultivation by the early 19th century. Field names recorded on the tithe map, including *Twink Leaze*, *Rough Breach* and *Shortwood*, reflect this pattern of clearance and agricultural improvement. While such activity may have resulted in minor below-ground features, including boundary ditches, drainage features or clearance deposits, these are likely to be of limited archaeological significance.
- 4.7. LiDAR data shows no clear surviving earthworks within the Site, and there is no evidence for ridge and furrow or other extensive agricultural remains. This absence likely reflects a combination of historic woodland cover, subsequent agricultural activity and modern landscaping, including the construction of the existing dwelling, modern building and associated garden features. These activities will have resulted in localised truncation of archaeological deposits, particularly in areas subject to levelling or building works.
- 4.8. Remains at the Site are considered likely to be of local to regional significance, depending on their extent, preservation and relationship to the previously identified probable villa site.

Historic Landscape Character

- 4.9. The Wiltshire Historic Landscape Characterisation identifies the Site as lying within a landscape type defined as *Ancient Semi-Natural Woodland*, indicating that the area was historically wooded and likely of medieval or earlier origin. Such landscapes are typically characterised by long continuity of woodland cover, although they may have been subject to phases of clearance or assarting.
- 4.10. Historic map regression supports this interpretation, with the Site shown as woodland in the early 19th century, prior to subsequent clearance and conversion to agricultural use. By the time of the tithe survey, parts of the Site had been brought into cultivation, while adjacent areas remained wooded. This reflects a transitional landscape, in which former woodland was incrementally cleared and brought into agricultural use.
- 4.11. The field names recorded in the tithe apportionment, including *Twink Leaze*, *Rough Breach* and *Shortwood*, provide further evidence for this process, indicating a landscape characterised by mixed pasture, recently improved land and retained woodland. This

contributes to an understanding of the post-medieval evolution of the landscape, particularly in relation to agricultural improvement and estate management.

- 4.12. However, the historic landscape of the Site has been subject to subsequent change during the 20th century, including the construction of the existing dwelling, garden landscaping and associated features. These changes have reduced the legibility of earlier landscape components within the Site itself, although elements of the wider historic landscape framework remain evident in the surrounding area.
- 4.13. The Historic Landscape Character of the Site is therefore considered to be of low to moderate significance, contributing to the understanding of local landscape evolution but not representing a rare or particularly well preserved example of its type.

5. PLANNING PROPOSAL

- 5.1. The planning proposal comprises the demolition of the existing buildings at the Site and the construction of a new dwelling. No layout or proposal plans have been completed at this stage but it is surmised that the Site will be subject to significant disturbance during the demolition and construction process.

6. POTENTIAL FOR EFFECTS ON HERITAGE ASSETS

Previous impacts

- 6.1. The Site has remained largely undeveloped since at least the early 19th century, and likely throughout earlier periods, with historic mapping indicating its origin as part of a wooded landscape subsequently cleared and brought into agricultural use.
- 6.2. The clearance of woodland undertaken during the 19th century, will have resulted in a degree of below ground disturbance, particularly through tree removal and root action, which may have caused localised truncation or disturbance of archaeological deposits. However, such impacts are typically uneven in distribution and are unlikely to have resulted in wholesale removal of archaeological remains.
- 6.3. More recent development at the Site comprises the construction of the existing dwelling, associated outbuildings and garden landscaping. These works have resulted in localised ground disturbance, including areas of levelling and terracing, which are likely to have truncated archaeological deposits in these areas. However, such impacts are likely to be spatially limited, and it is probable that archaeological remains survive in less disturbed parts of the Site.

Buried archaeology

- 6.4. The proposed development has the potential to result in disturbance to, or removal of, buried archaeological remains, particularly those of Romano-British date. In accordance with national planning policy, it is considered appropriate that further consultation is undertaken with the County Archaeological Officer.

Historic Landscape Character

- 6.5. The proposed development will result in the replacement of the existing dwelling within an already developed plot. As such, the Site will remain in residential use, and there will be no fundamental change in land use.

- 6.6. While construction works will introduce a degree of short term disturbance, the overall impact on the Historic Landscape Character of the Site will be limited. The existing boundaries and wider landscape structure will remain unaffected, and the Site will continue to form part of the broader historic landscape.
- 6.7. As a result, the proposed development will result in no more than a negligible effect on the Historic Landscape Character of the Site.

7. CONCLUSION

- 7.1. The Site has remained largely undeveloped since at least the early 19th century, and likely throughout earlier periods, with historic mapping indicating its origin as part of a wooded landscape subsequently cleared and brought into agricultural use.
- 7.2. Evidence derived from the two HERs consulted, historic mapping and previous archaeological investigations indicates a high potential for Romano-British remains within the Site, associated with a previously identified occupation area interpreted as a possible villa. The extent of this settlement is not fully understood, and there is a strong likelihood that further structural remains and associated features survive beyond the areas previously investigated. Such remains may be of local to regional significance, depending on their preservation and extent.
- 7.3. Evidence for prehistoric, medieval and later activity within the Site is comparatively limited, with any remains of these periods likely to be of low to local significance.
- 7.4. The proposed development comprises the demolition of the existing dwelling and the construction of a replacement unit, which will involve ground disturbance associated with demolition, excavation and construction. These works have the potential to affect any buried archaeological remains present within the Site, particularly those of Romano-British date. Given the identified archaeological potential, it is considered appropriate that further consultation is undertaken with the County Archaeological Officer.
- 7.5. The Historic Landscape Character of the Site is considered to be of low to moderate significance and will experience no more than a minor effect as a result of the proposed development.
- 7.6. Overall, this assessment has identified no archaeological constraints that would preclude the proposed development proceeding.

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Appendix 1: Gazetteer of heritage assets

FIG. REF.	LIST ENTRY	NAME	GRADE	EAST	NORTH
Designated Sites and Monuments (Historic England data:1km study area)					
World Heritage Site data (1km study area)					
WHS1	1000103	City of Bath	n/a	374693	164413
Listed Buildings (1km study area)					
LB1	1215119	The Old Mill	II	377461	161907
LB2	1215120	2, St Michaels Court	II	377262	161930
LB3	1215195	Monkton Combe School (The Part Of The Terrace Block Known As The Old Vicarage)	II	377357	162072
LB4	1215196	Julian Cottages	II	377299	162030
LB5	1215197	The Wheelwright's Arms	II	377286	162001
LB6	1215198	Monument To Margaretta Shute, In Churchyard To North Of St Michael's Church	II	377216	161941
LB7	1215199	Unidentified Monument In Churchyard And To South Of East End Of South Aisle Of St Michael's Church	II	377228	161914
LB8	1215200	Unidentified Monument, In Churchyard And 3 Yards South Of St Michael's Church	II	377216	161914
LB8	1288263	Lock-Up At Monkton Combe	II	377358	161957
LB9	1215224	Unidentified Monument, In Churchyard And 6 Yards South Of St Michael's Church	II	377223	161910
LB10	1215225	Unidentified Monument, In Churchyard And 2 Yards South Of West End Of St Michael's Church	II	377213	161914
LB11	1215226	Church Farmhouse	II	377196	161943
LB12	1215227	Barn To North Of Church Farmhouse	II	377182	161949
LB13	1215228	Monkton Combe School (The Main Or Old Block Known As The Old Farm)	II	377412	162100
LB14	1288193	Monk's Retreat	II	377199	161936
LB15	1288194	Dovecote, 60 Yards To South West Of Church Farmhouse	II	377162	161916
LB16	1288219	Church Of St Michael	II	377219	161924
LB17	1288220	Group Of 3 Unidentified Monuments, In Churchyard To South East Of St Michael's Church	II	377237	161926
LB19	1288264	1, St Michael's Court	II	377258	161936
LB20	1021828	Brook Cottage	II	377451	161730
LB21	1194698	Gate Piers, Gates, Railings And Walls On North East And North West Sides Of Waterhouse	II	377585	161837
LB22	1364106	Waterhouse	II	377509	161762
LB23	1021823	Lynton Cottage	II	378051	160762
LB24	1021824	Baptist Chapel	II	378068	160742

LB25	1021825	33, Middle Stoke	II	378107	160685
LB26	1021827	25, Middle Stoke	II	378061	160716
LB27	1194680	17, 18, 19 And 20, Middle Stoke	II	378058	160748
LB28	1194684	21 And 22, Middle Stoke	II	378079	160757
LB29	1194689	36, Middle Stoke	II	378111	160682
LB30	1194691	28, Middle Stoke	II	378062	160695
LB31	1452132	Limpley Stoke War Memorial	II	378085	160689
LB32	1021820	Gate Piers And Gates At No 24 (Weir House)	II	378169	160979
LB33	1021821	Gate Piers At No 30 (The Manor House)	II	378202	160886
LB34	1021822	The Hop Pole Inn	II	378152	161055
LB35	1285579	The Manor House	II	378216	160903
LB36	1364105	Weir House	II	378188	160985
LB37	1285607	Chatleigh House	II	378056	161334
LB38	1158385	Barn, 20 Yards To West Of Peipards Farmhouse	II	377670	160228
LB39	1194678	Cleeve Hill House	II	376277	160729
LB40	1232501	Tucking Mill Cottage	II	376509	161515
LB41	1285592	Barn At Brett Farm	II	377115	161419
LB42	1288240	Tucking Mill House	II	376582	161567
LB43	1320807	Mill House And Former Mill	II	376314	160631
Scheduled Monuments					
SM1	1005641	Limpley Stoke Bridge (or Stokeford Bridge)	n/a	378236	161245
Conservation Area(1km study area)					
CA1	n/a	Monkton Combe	n/a	377274	162056

FIG. REF.	HE/HER REF.	NAME	SUMMARY	TYPE	PERIOD
HER data (1km study area)					
1	ST76SE301	Romano-British Wall, West of River Avon Bridge	Building; Wall; Villa	BLD	Romano-British
2	MWI68385	Bridge Farm	Farmstead	BLD	C19
3	MWI68386	Brett Farm (Kennels Farm)	Farmstead	BLD	C19 to unknown
4	MWI68387	Site of Outfarm adjacent to Short wood	Outfarm	MON	C19
5	MWI68388	Upland Farm	Farmstead	BLD	C19
6	MWI68389	Avonside	House; Farmstead	BLD	C18 to C19
7	MWI79699	Bronze Age Spearhead, Midford Brook	Findspot	FS	Bronze Age
8	MWI79729	Possible Roman Burials, Limpley Stoke Railway Station	Inhumation	FS	Romano-British
9	MWI79732	Limpley Mill, Limpley Stoke	Woollen Mill; Multi Storey Mill; Chimney; Office	BLD	C19
10	ST76SE450	Limpley Stoke	Settlement	MON	Medieval
11	ST76SE453	Limpley Stoke Bridge	Bridge	MON	C18
12	MWI31942	Lynchets, East of Midford Lane	Lynchet	MON	Unknown
13	MWI31943	Lynchets, North of Brett Farm	Lynchet	MON	Unknown
14	ST76SE300	Roman Settlement, South East of Kennels Farm	Settlement; Artefact Scatter; Building; Villa	MON	Romano-British
15	MWI79692	Bradford On Avon Branch Railway	Railway	MON	C19 to unknown
16	MWI79692	Roman Road Bath to Kingston Deverill	Road	MON	Romano-British
17	ST76SE453	Limpley Stoke Bridge	Bridge	MON	C18
18	MWI31943	Lynchets, North of Brett Farm	Lynchet	MON	Unknown
19	MWI43713	Baptist Chapel, Middle Stoke	Baptist Chapel	BLD	C19 to unknown
20	MWI79718	Limpley Stoke Railway Station	Railway Station	MON	C19 to unknown
21	60039	Somerset and Dorset Joint Railway, Bath to Evercreech line	Railway	AR	C19
22	60189	Roman road, Bathwick to Poole Harbour	Road	AR	Romano-British

23	61519	Romano-British pottery, Hayes Wood Enclosure, Freshford	Findspot; Herd	AR	Romano-British
24	61533	Neolithic and Bronze Age flints, Hayes Wood enclosure, Freshford	Findspot; Lithic implement	AR	Neolithic& Bronze Age
25	61534	18th Century lock up, Mill Lane, Monkton Combe	Lock up	AR	C18
26	61535	Hayes Wood Enclosure, Hayes Wood, Freshford	Enclosure; Findspot; Flint implement; Sherd	AR	Iron Age & Romano-British
27	61536	Woodwick deserted medieval village, Peipards Farm, Freshford	Croft; Deserted settlement; Dovecote; Gravestone ;Inhumation; Manor house; Parish church; Sherd; Trackway	AR	Medieval to post-medieval
28	61537	Medieval pillow mound or Bronze Age round barrow, W of Peipards Farm, Freshford	Pillow mound; Round barrow	AR	Bronze Age & medieval
29	61538	Pillow mound, W of Peipards Farm, Freshford	Pillow mound; Round barrow	AR	Bronze Age & medieval
30	61746	Midford Mill, Midford Hill, Midford	Corn Mill house; Watermill; Weir	AR	Medieval to post-medieval
31	61748	Monkton Combe Mill, SE of the old station, Monkton Combe	Carriage house; Flock mill; Office; Watermill	AR	C19;Industrial
32	61749	19th Century stone processing mill and Fuller's Earth Works at Tucking Mill Cottage, Tucking Mill, Midford	Fullers earth pit; Fulling Mill pond; Stone working site	AR	C19
33	61909	16th Century dovecote at Church Farm, Church Lane, Monkton Combe	Dovecote	AR	C16
34	61910	Monk's Retreat and Church Farmhouse, Church Lane, Monkton Combe	Farmhouse	AR	C16;C17
35	61911	St Michael's Court, Church Lane, Monkton Combe	Brewery; Malt house	AR	C19
36	62430	Kingham tramway, Kingham Quarry to Tucking Mill, Monkton Combe	Inclined plane; Railway siding; Tramway	AR	C19

37	62437	Mount Pleasant Quarries, Mount Pleasant	Limestone quarry	AR	C19
38	62440	19th Century horse engine, Hayes Wood Quarry, Freshford	Horse engine	AR	C19
39	62441	Late 19th Century horse engine, Freshford Quarry, Freshford	Horse engine	AR	C19
40	62442	Freshford Quarry, W of Midford Lane, Freshford	Limestone quarry	AR	C19
41	62443	19th Century horse engine, NE of Hayes Wood, Freshford	Horse engine; Lime kiln	AR	C19
42	62580	Midford Castle Park, Southstoke and Monkton Combe	Hermitage (garden);Landscape park	AR	C18
43	62737	St Michael's Church, Church Lane, Monkton Combe	Anglican church; Churchyard; Parish church; War memorial (tribute)	AR	Medieval to post-medieval
44	62844	Monkton Combe Station (BNSR), Mill Lane, Monkton Combe	Film studio; Railway station	AR	C20
45	63174	Section of Somerset Coal Canal, Limpley Stoke Viaduct to Monkton Combe	Canal	AR	C18
46	63175	Section of Somerset Coal Canal, Monkton Combe to Tucking Mill	Canal	AR	C18
47	63176	Section of Somerset Coal Canal, Tucking Mill to Midford Tunnel	Canal tunnel	AR	C18
48	66108	Hayes Wood Quarry and Stoke Hill Mine, Midford Lane, Limpley Stoke	Ammunition dump; Limestone quarry	AR	Industrial; Second world war
49	66129	Roman road, W of Hayes Wood Camp, Freshford	Road	AR	Romano-British
50	66219	Camerton to Limpley Stoke branch line, Bristol and North Somerset Railway	Railway	AR	C19
51	69029	19th Century barn N of Church Farmhouse, Monkton Combe	Barn	AR	C19

52	69030	1, St Michael's Court, Monkton Combe	House	AR	C18
53	69031	2, St Michael's Court, Monkton Combe	House	AR	C17
54	69032	The Wheelwright's Arms, Monkton Combe	House	AR	C18
55	69033	1 to 3, Julian Cottages, Monkton Combe	Row	AR	C19
56	69034	The Old Vicarage, Church Lane, Monkton Combe	Vicarage	AR	C19
57	69035	The Old Farm, Monkton Combe School, Monkton Combe	Farmhouse; Theological college	AR	C18 & C19
58	69205	Tucking Mill House, Monkton Combe	House	AR	C18
59	69742	19th Century Shute chest tomb N of St Michael's Church, Monkton Combe	Chest tomb	AR	C19
60	69743	18th Century chest tombs E of St Michael's Church, Monkton Combe	Chest tomb	AR	C18
61	69744	18th Century altar tomb SE of St Michael's Church, Monkton Combe	Altar tomb	AR	C18
62	69745	18th Century chest tomb S of St Michael's Church	Chest tomb	AR	C18
63	69746	18th Century chest tomb S of St Michael's Church, Monkton Combe	Chest tomb	AR	C18
64	69747	18th Century chest tomb SE of St Michael's Church, Monkton Combe	Chest tomb	AR	C18
65	69785	19th Century viaduct W of Tucking Mill Reservoir, South Stoke	Viaduct	AR	C19
66	70814	1 to 13, Mount Pleasant, Monkton Combe	Terrace; Workers cottage	AR	Industrial
67	70817	19th Century quarry, Tucking Mill, Monkton Combe	Quarry	AR	C19

68	70818	Combe Down Water Works Co., Tucking Mill, Monkton Combe	Waterworks	AR	C19
69	70819	19th Century watercress beds, Tucking Mill, Monkton Combe	Watercress bed	AR	C19
70	70851	Medieval settlement of Monkton Combe	Village	AR	Medieval
71	70910	Monkton Combe canal bridge, Mill Lane, Monkton Combe	Canal bridge; Road bridge	AR	C19
72	70911	1 to 3, Station Cottages, Mill Lane, Monkton Combe	Row	AR	C19
73	70929	19th Century footbridge E of Monkton Senior School, Church Lane, Monkton Combe	Footbridge	AR	C19
74	70931	Senior School Chapel, Monkton Combe School, Church Lane, Monkton Combe	Chapel; War memorial (freestanding)	AR	C20
75	70932	Monkton Combe School, Church Lane, Monkton Combe	Theological college	AR	C19
76	70933	Monkton Combe Junior School, Church Road, Combe Down	Junior school	AR	C20
77	70935	18th Century canal milepost, opposite Tucking Mill Cottage, Tucking Mill, Midford	Milestone	AR	C18
78	71253	18th-century turnpike road, Odd Down to Hinton Charterhouse (Woolverton and Warminster)	Toll road	AR	C18
79	71292	19th century turnpike road, Bathwick to Hinton Charterhouse (Warminster)	Toll road	AR	C19
80	71651	School, Dwelling House and Garden, Church Lane, Monkton Combe	School	AR	Industrial
81	72101	Independent Chapel, Church Lane, Monkton Combe	Nonconformist chapel	AR	Industrial

HER Events data (1km study area)					
EV1	EWI1035	Excavation Southeast of Kennels Farm	Excavation	EVT	n/a
EV2	EWI11005	Watching Brief at Limpley Stoke Railway Station Access Road	Watching brief	EVT	n/a
EV3	EWI8355	Research into the origins of the north-western boundary of Wiltshire	Research	EVP	n/a
EV4	EWI6653	Southern Rivers Palaeolithic Project 1991-1992	Research	EVS	n/a
EV5	EWI7629	A LIDAR Survey of a Part of the Bradford Hundred	Lidar survey	EXT	n/a
EV6	EWI5160	Watching Brief at Crockford Meadow, Winsley Hill	Watching brief	EVT	n/a
EV7	65570	Watching brief (2013), Somerset and Dorset Joint Railway, Tucking Mill to Oldfield Park, Bath	Watching brief	EV	n/a
EV8	71430	Watching brief (2025), Hayeswood Tower to Broadfield Farm, Freshford	Watching brief	EV	n/a
EV9	65125	Watching brief (2006), Raw Water Main, Monkton Combe	Watching brief	EV	n/a
EV10	65677	Watching brief (2014), St. Michael's Church, Monkton Combe	Watching brief	EV	n/a
EV11	65389	Watching brief (2010), Monkton Combe Mill, Monkton Combe	Watching brief	EV	n/a
EV12	64591	Earthwork survey (1982), Peipards Farm, Freshford	Earthwork survey	EV	n/a
EV13	64160	Excavation (1934), Hayes Wood Enclosure, Freshford	Excavation	EV	n/a

Appendix 2: Planning policy and guidance

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

66 General duty as respects listed buildings in exercise of planning functions

(1) In considering whether to grant planning permission [F1 or permission in principle] 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.

(2) Without prejudice to section 72, in the exercise of the powers of appropriation, disposal and development (including redevelopment) conferred by the provisions of sections 232, 233 and 235(1) of the principal Act, a local authority shall have regard to the desirability of preserving features of special architectural or historic interest, and in particular, listed buildings.

(3) The reference in subsection (2) to a local authority includes a reference to a joint planning board F

(4) Nothing in this section applies in relation to neighbourhood development orders.

72 General duty as respects conservation areas in exercise of planning functions

(1) In the exercise, with respect to any buildings or other land in a conservation area, of any [F1 functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

(2) The provisions referred to in subsection (1) are the planning Acts and Part I of the M1 Historic Buildings and Ancient Monuments Act 1953 [F2 and sections 70 and 73 of the Leasehold Reform, Housing and Urban Development Act 1993].

(3) In subsection (2), references to provisions of the Leasehold Reform, Housing and Urban Development Act 1993 include references to those provisions as they have effect by virtue of section 118(1) of the Housing Act 1996.

(4) Nothing in this section applies in relation to neighbourhood development orders.

National Planning Policy Framework (NPPF; February 2025)

16. Conserving and enhancing the historic environment

202. 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 Value. 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 generations.

203. 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:

- d) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- e) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

- f) the desirability of new development making a positive contribution to local character and distinctiveness; and
- g) opportunities to draw on the contribution made by the historic environment to the character of a place.

204. 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.

205. 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.

206. 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

207. 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.

208. 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.

209. 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.

210. 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.

211. 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

212. 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.

213. 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 exceptional.

214. 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.

215. 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.

216. 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.

217. 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.

218. 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 accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

219. 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.

220. 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 214 or less than substantial harm under paragraph 215, 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.

221. 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: Wiltshire Core Strategy 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
- 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 used 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 conducted 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.

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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