

SANDBAY SOLAR KEWSTOKE NORTH SOMERSET

Results of a Heritage Assessment



South West Archaeology Ltd. report no. 220921



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Sandbay Solar, Kewstoke, North Somerset

Results of a Heritage Assessment

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Work undertaken by SWARCH for Sandbay Solar Ltd. (the Client)

SUMMARY

This report presents the results of a heritage impact assessment carried out by South West Archaeology Ltd. (SWARCH) for a proposed PV development on land at Kewstoke, North Somerset. This work was carried out on behalf of Sandbay Solar Ltd. (the Client) in advance of a planning application.

The site is located towards the centre of an expanse of reclaimed marshland between Kewstoke, Sandbay, and Woodspring Priory. While now part of the ancient ecclesiastical parish of Kewstoke, it probably formed part of the Domesday Manor of Woodspring, or one of the two smaller manors added to Woodspring between 1066 and 1086. The pattern of landholding in this area was exceedingly complex, with many of the fields held as detached parcels belonging to farms elsewhere. This reflects the process by which the moor was reclaimed: common land was enclosed through agreement and allocated to the various stakeholders. It is likely this fieldscape was established during the medieval period, given the way the parish boundary between Worle and Kewstoke zig-zags through the fields and includes detached parcels. Relatively little archaeological fieldwork has been conducted in this area, and this reflects the bias of development pressure which disproportionately falls upon Weston-super-Mare and Worle. The geophysical (gradiometer) survey undertaken shows most of the fields covered by the palaeochannels of the former saltmarsh, with any archaeological signature drowned out by geological responses. The only exception is the 'island' occupied by Elmsley Nursery, where (tentatively) a sub-square enclosure with roundhouse occupies the highest point. Roman pottery and coins have been found c.50m to the south of the site, and Roman pottery was recovered during the walkover survey in Field 9. This evidence would suggest the Elmsley was a focus for (probably) Late Prehistoric and (definitely) Romano-British occupation and/or activity. Buried peat deposits are known, probably dating to the Neolithic, but these are likely to occur at such a depth as to be unaffected by proposals.

There are 29 Listed Buildings and four Scheduled monuments within 1km of the proposed development, and two other relevant Scheduled monuments beyond 1km, have been assessed. In terms of indirect impacts, most of the designated heritage assets in the wider area are located at such a distance to minimise the impact of the proposed development, or else the contribution of setting to overall significance is less important than other factors. The landscape context of many of these buildings and monuments is such that they would be partly or wholly insulated from the effects of the proposed development by a combination of local blocking from trees, buildings, or embankments, or that other modern intrusions have already impinged upon their settings. However, the size of the development, and the presence of suitably elevated viewpoints or tall and visually prominent features, would indicate an appreciable effect (minor adverse) on three sites: the Church of St Paul at Kewstoke (GI), the Priory Church at Woodspring (GI), and the bowl and disc barrows near Sandpoint Farm (SAM). The greatest effect is likely to fall upon the historic landscape (minor to moderate adverse) which is otherwise largely untouched by large visually modern developments. On that basis the impact of the proposed development can be assessed as minor adverse overall.



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1.0 INTRODUCTION

LOCATION:	NEAR ELMSLEY NURSERY
PARISH:	KEWSTOKE
COUNTY:	NORTH SOMERSET
CENTROID NGR:	ST 3423 6463
PLANNING NO.	PRE-PLANNING
SWARCH REF.	KSBS21
OASIS REF.	SOUTHWES1-505252

1.1 PROJECT BACKGROUND

South West Archaeology Ltd. (SWARCH) was commissioned to undertake a heritage assessment for a proposed PV development on land in Kewstoke, North Somerset. This work was undertaken in accordance with best practice and CIfA guidelines.

1.2 TOPOGRAPHICAL AND GEOLOGICAL BACKGROUND

The proposed site is located to the north-east of Kewstoke village, to the north of the hamlet of Norton, between the Kewstoke and Redcroft Rhynes. The proposed site comprises nine fields within a low-lying agricultural fieldscape. The fields occupy flat ground at c.5m AOD.

The soils of the proposed site are deep stoneless mainly calcareous clayey soils of the Newchurch Association, with flooding and groundwater controlled by ditches and pumping (SSEW 1983). For most of the site the bedrock geology is concealed beneath a variable depth of tidal flat deposits (Wentlooge Formation), most probably stiff blue estuarine clays. There are no boreholes local to the site to determine the thickness of these deposits, but Field F8 is slight elevated and is not covered by superficial deposits. At depth, the northern part of the site (F2-F7) is underlain by mudstones and limestones of the Blue Lias Formation. The geology of the southern part of the site (F1, F8-F9) is underlain by the mudstones of the Mercian Mudstone Group, the Blue Anchor Formation, and the Penarth Group (BGS 2022). The ridges to the north and south of Sand Bay are dominated by harder limestones with some volcanic elements.

1.3 HISTORICAL & ARCHAEOLOGICAL BACKGROUND

The site is located towards the centre of an expanse of reclaimed marshland between Kewstoke, Sandbay, and Woodspring Priory. While now part of the ancient ecclesiastical parish of Kewstoke, it probably formed part of the Domesday Manor of Woodspring or one of the two smaller manors added to Woodspring between 1066 and 1086. The pattern of landholding in this area was, if the tithe survey of 1840 is any guide, exceedingly complex, with many of the fields held as detached parcels belonging to farms in Milton, Newton, Norton, Sand Bay, Woodspring and Worle. This reflects the process by which the moor was reclaimed: common land was enclosed through agreement and allocated to the various stakeholders.

The historic landscape here is characterised as *post-medieval enclosures from anciently reclaimed inland moors*, but it is likely this fieldscape was established during the medieval period, given the way the parish boundary between Worle and Kewstoke zig-zags through the fields and includes detached parcels. Relatively little archaeological fieldwork has been conducted in this area, and this reflects the bias of development pressure which disproportionately falls upon Weston-super-Mare and Worle. Buried peat deposits are known, likely to date to the Neolithic. The single most relevant entry in the North Somerset HER is for a find of Roman pottery and coins near Lower Norton Lane (MNS2725) c.50m to the south of the site. Roman Pottery was also recovered during the walkover survey in Field F9, and these two finds would suggest the slightly elevated 'island' now occupied by

Elmsley Nursery (formerly *Elmshay*) was a focus for (probably) Late Prehistoric and (definitely) Romano-British occupation and/or activity.



FIGURE 1: SITE LOCATION.

1.4 METHODOLOGY

The desk-based assessment follows the guidance as outlined in: *Standard and Guidance for Archaeological Desk-Based Assessment* (CifA 2020) and *Understanding Place: historic area assessments in a planning and development context* (Historic England 2017). Note that the Historic England aerial photograph database at Swindon could not be consulted due to the long turnaround times.

The historic visual impact assessment follows the guidance outlined in: *Conservation Principles: policies and guidance for the sustainable management of the historic environment* (English Heritage 2008), *The Setting of Heritage Assets* (Historic England 2017), and with reference to *Visual Assessment of Wind Farms: Best practice* (University of Newcastle 2002) and *Guidelines for Landscape and Visual Impact Assessment 3rd edition* (Landscape Institute 2013). See Appendix 4.

2.0 HERITAGE IMPACT ASSESSMENT

2.1 HERITAGE IMPACT ASSESSMENT - OVERVIEW

The purpose of heritage impact assessment is twofold: Firstly, to understand – insofar as is reasonably practicable and in proportion to the importance of the asset – the significance of a historic building, complex, area, monument, or archaeological site (the ‘heritage asset’). Secondly, to assess the likely effect of a proposed development on the heritage asset (direct impact) and/or its setting (indirect impact). The methodology employed in this assessment is based on the approach outlined in the relevant DoT guidance (DMRB LA 104 2020), used in conjunction with the ICOMOS (2011) guidance and the staged approach advocated in *The Setting of Heritage Assets* (GPA3 2nd Ed Historic England 2017). The methodology employed in this assessment can be found in Appendix 4.

2.2 NATIONAL POLICY

General policy and guidance for the conservation of the historic environment are now contained within the *National Planning Policy Framework* (Department for Communities and Local Government 2021). The relevant guidance is reproduced below:

Paragraph 194

In determining applications, local planning authorities should require the applicant to describe the significance of any heritage assets affected, including the 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 be consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which a 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.

Paragraph 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 assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.

A further key document is the Planning (Listed Buildings and Conservation Areas) Act 1990, in particular section 66(1), which provides *statutory protection* to the setting of Listed buildings:

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.

2.3 LOCAL POLICY

The policies of the North Somerset Core Strategy CS5: Landscape and the Historic Environment relevant to the Scheme are reproduced below:

Landscape: The character, distinctiveness, diversity and quality of North Somerset’s landscape and townscape will be protected and enhanced by the careful, sensitive management and design of

development. Close regard will be paid to the character of National Character Areas in North Somerset and particularly that of the 11 landscape types and 31 landscape character areas identified in the North Somerset Landscape Character Assessment. The Mendip Hills Area of Outstanding Natural Beauty (AONB) will be protected by ensuring that development proposals conserve and enhance its natural beauty and respect its character, taking into account the economic and social well-being of the area.

Historic Environment. The council will conserve the historic environment of North Somerset, having regard to the significance of heritage assets such as conservation areas, listed buildings, buildings of local significance, scheduled monuments, other archaeological sites, registered and other historic parks and gardens. Particular attention will be given to aspects of the historic environment which contribute to the distinctive character of North Somerset, such as the Victorian townscapes and seafronts in Weston and Clevedon.

Several policies in the North Somerset Council Development Management Policies: Sites and Policies Plan Part 1 adopted 2016 should be considered as part of the Scheme and are reproduced below:

Policy DM4 Listed Buildings: Development will be expected to preserve and where appropriate enhance the character, appearance and special interest of the listed building and its setting. Opportunities will be sought to repair or remove harm caused from past unsympathetic alterations and additions. In some cases contributions may be sought towards enhancement of the setting of the listed building in order to mitigate other unavoidable harm caused. Where a building is identified to be at risk the council will seek to secure the protection of the building to prevent its continued deterioration, such as through the use of enforcement powers to protect the building. Applicants should provide the council with sufficient information to enable an assessment to be made of the impact of the proposals on the special architectural or historic interest of the Listed Building and its setting. A high standard of design and detailing will be expected where alterations to a Listed Building are proposed.

Policy DM6 Archaeology: Archaeological interests will be fully taken into account when determining planning applications. Where an initial assessment indicates that the development site includes or has the potential to include heritage assets with archaeological interests, the council will seek an archaeological assessment and field evaluation. This is to establish the extent and importance of the remains and the potential harm of the proposals to their significance before the planning application is determined. An initial field evaluation as opposed to a desk-based assessment will only be required where necessary. It is nearly always preferable that archaeological remains are preserved 'in situ' as even archaeological excavation means the total destruction of evidence, apart from removable artefacts. In some cases, applicants will be required to modify their proposal to take account of the archaeological remains, for example by using foundations which avoid disturbing the remains or by the careful siting of landscaped or open areas. In cases where the council decides that it is not necessary to preserve remains 'in situ', developers will be required to make appropriate and satisfactory provision for the excavation and recording of the remains before development commences. Planning conditions will be attached to the grant of planning permission requiring an approved programme of archaeological work to be undertaken before development commences, which may include the submission of geotechnical information. Alternatively, legal agreements may be sought with developers, before permission is granted, to excavate and record the remains and to publish the results. Where archaeological assets are considered to be at risk, the council will seek to secure their protection to prevent continued deterioration.

Policy DM7 Non-designated Heritage Assets: When considering proposals involving non designated heritage assets the council will take into account their local significance and whether they warrant protection where possible from removal or inappropriate change including harm to their setting.

2.4 STRUCTURE OF ASSESSMENT – DIRECT AND INDIRECT IMPACTS

This assessment is broken down into two main sections. Section 3.0 addresses the *direct impact* of the proposed development i.e. the physical effect the development may have on heritage assets within, or immediately adjacent to, the development site. Designated heritage assets on or close to a site are a known quantity, understood and addressed via the *design and access statement* and other planning documents. Robust assessment, however, also requires a clear understanding of the value and significance of the *archaeological* potential of a site. This is achieved via the staged process of archaeological investigation detailed in Section 3.0 and Appendix 4. Section 4.0 assesses the likely effect of the proposed development on known and quantified designated heritage assets in the local area. In this instance the impact is almost always indirect i.e. the proposed development impinges on the *setting* of the heritage asset in question and does not have a direct physical effect.

3.0 DIRECT IMPACTS

3.1 STRUCTURE OF ASSESSMENT

For the purposes of this assessment, the *direct effect* of a development is taken to be its direct physical effect on the buried archaeological resource. In most instances the effect will be limited to the site itself. However, unlike designated heritage assets (see Section 4.0) the archaeological potential of a site, and the significance of that archaeology, must be quantified by means of a staged programme of archaeological investigation. Sections 3.2-3.6 examine the documentary, cartographic and archaeological background to the site; Section 3.7 details the geophysical survey undertaken, and Section 3.8 summarises this information in order to determine the significance of the archaeology, the potential for harm, and outlines mitigation strategies as appropriate. Appendix 4 details the methodology employed to make this judgement.

3.2 DOCUMENTARY HISTORY

Kewstoke is first documented in 1086 as *Chiwestoch* (personal name + *stoc*, a dependant farm), assessed in the Domesday Book at 1½ hides with land for 2 ploughs. It was held by Edric in 1066, and by Osbern from Gilbert son of Thorold in 1086. The assessment is rather small, and the later parish also includes two Domesday manors at Milton (worth 2½ hides with land for 3 ploughs in total) and Woodspring (*Worspring*), later synonymous with the Priory there. Woodspring was by far the larger estate, worth 6.25 hides with land for 12 ploughs. Two other manors (worth 3 hides with land for 8 ploughs) had been added to the estate after 1066. In 1066 these manors were held by Everwacer, Alward and Cola (=Collum?); in 1086 by William of Falaise, who acquired it as a dowry from Serlo of Burcy. Woodspring was, then, a manor of 9.25 Hides with land for 20 ploughs. To compare, the capital manor Worle was worth only 6½ hides with land for 15 ploughs.

As explored by Rippon (2006, 136), it seems likely there was an early medieval estate centred on Worlebury Hill covering approximately 22km² ('Worlebury'). There are several estates here with directional or subordinate place-names (*west-tūn*; *ash-cot*; *middle-tūn*; *north-tūn*, *new-tūn*; *kew-stoc*), the parish boundaries are interdigitated, and there are numerous detached parcels. Worle has been identified as the estate centre due to the existence of the hillfort and a large associated Romano-British settlement with some evidence for early medieval occupation, and unpublished excavations in Worle identified a large ditched enclosure that produced Saxo-Norman pottery.

The tithe survey data would suggest that individual farming settlements and estates did not hold large blocks of land out on the Level, but that the Level had been reclaimed in stages from lands held in common, and once embanked they were divided up between the various stakeholders. The tithe survey indicates parts of the site were held by the Piggott Smythe family (the successors in title to Woodspring Priory) as part of Norton Farm, but that other parts of the site belonged to Holme Farm, Newton Farm, Sandbay Farm, Sandpoint Farm, were glebe, or held by smallholders. The descent of the land is thus unlikely to be easy to trace without detailed investigation. The easiest landholding to trace is that of Woodspring Priory. It was granted by William de Courtney to the double order of St Augustine and St Victor in c.1210. It was established at *Dodlinch* (location unknown) but subsequently re-established at its current location. The original charter does not survive but the 1325 confirmation of Edward I indicates it owned: all the lands of Worspring that belonged to William de Courtney and Robert de *Newton*, half of Worle Manor granted by Henry Engayne and the homage and dues of his tenants at Worle, Worspring, Kewstoke, Milton, Ebdon, and Locking. Additional lands were acquired by the Priory in Worle, Winscombe, Rolstone and Poke Rolstone in the 15th century. The Valor Ecclesiasticus of 1536 indicates the relative balance of its income (see Table 1).

TABLE 1: HOLDINGS OF WOODSPRING PRIORY IN 1536, ACCORDING TO THE VALOR ECCLESIASTICUS (1810 EDITION).

Temporalities	£	s	d	Spiritualities	£	s	d
Wurle	45	7	2	Wurle	8	-	-
Lockyng	14	3	8	Cewstock	4	13	3
Sandford & Mersshe	7	3	3	Lockyng	-	50	-
Butcomb	-	40	-				
Wurspryng	13	-	12				
TOTAL	79	53	25		12	63	3
	81	15	1		15	3	3

Following the Dissolution the Priory was granted to Sir William St Loe, who immediately leased the property to Edward Fetyplace (1536-57). Following Sir William's death it was sold in 1566 to William Carr (merchant and Bristol MP), and it was Carr who completed the transition from Priory to private house. In the late 17th century the Priory was inherited by the Piggot family, passing by marriage in 1823 to the Piggott-Smythe family. The Priory was let to tenants during the later 19th century. In 1918 it was sold to Major Vernon Tickell Hill and was owned by Richard Frank Burrough in 1939. In 1968 the property was acquired by the National Trust, and the Priory and environs were transferred to the Landmark Trust (this section from BaRAS 2010, 3-4).

3.3 CARTOGRAPHIC DEVELOPMENT

There are a number of county maps of Somerset which show the major villages (Speed etc.) but which contain little useful detail. A 1595 map (Figure 2) of Bristol Channel is of interest due to the prominence afforded to *Woodespring Priory*, presumably because the tower acted as a sea mark.

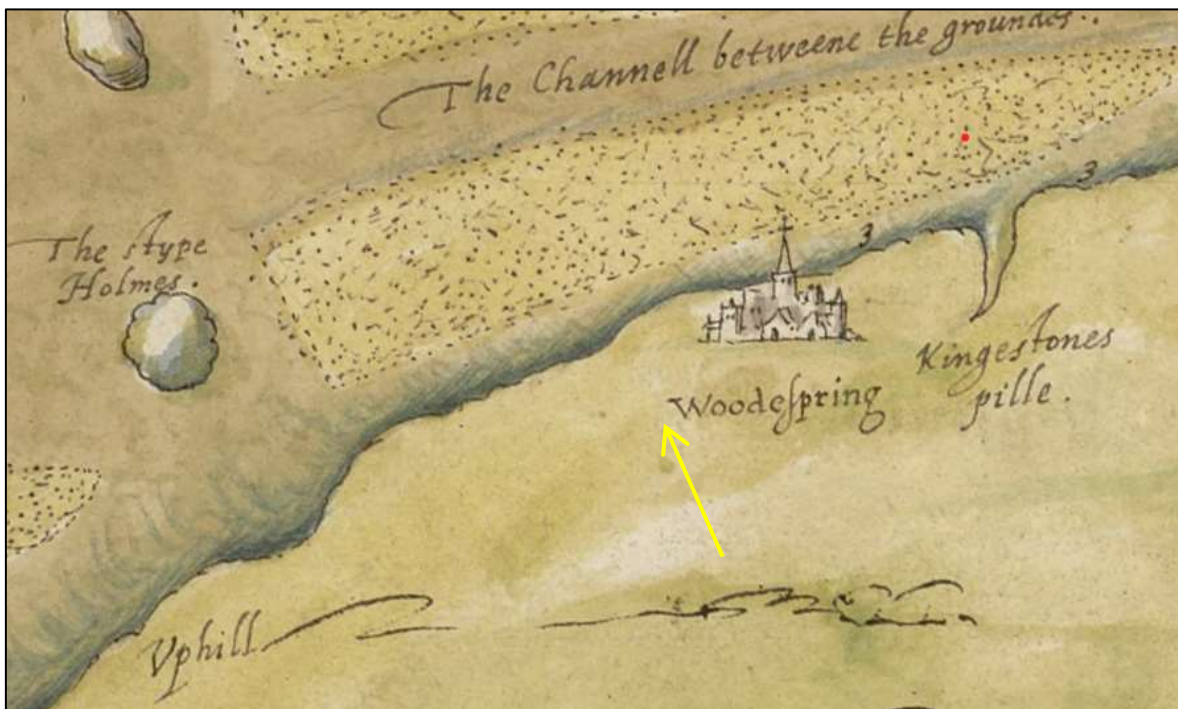


FIGURE 2: EXTRACT FROM A 1595 MAP OF THE BRISTOL CHANNEL (BL). NOTE THE PROMINENCE OF WOODSPRING PRIORY, PRESUMABLY AS A SEA MARK. THE APPROXIMATE SITE LOCATION IS INDICATED.

There are a number of useful early map available to this study, including the 1782 Day & Masters Map (Figure 3), the 1809 Ordnance Survey (OS) surveyor's draft map of the area (Figure 4), and the 1822 Greenwood Map (Figure 3). Detail, especially for the county maps, is limited. Even for the OS draft map – which depicts roads, settlements, and the boundary between enclosed and unenclosed land quite accurately – does not show much useful detail. For the OS draft map the field boundaries, while shown, are generally indicative rather than accurate. However, in broad terms they demonstrate the basic structure of the landscape was fixed by the late 18th century and indicates

that the Kewstoke Rhyne (which forms the western side of the site) was created between 1809 and 1822.

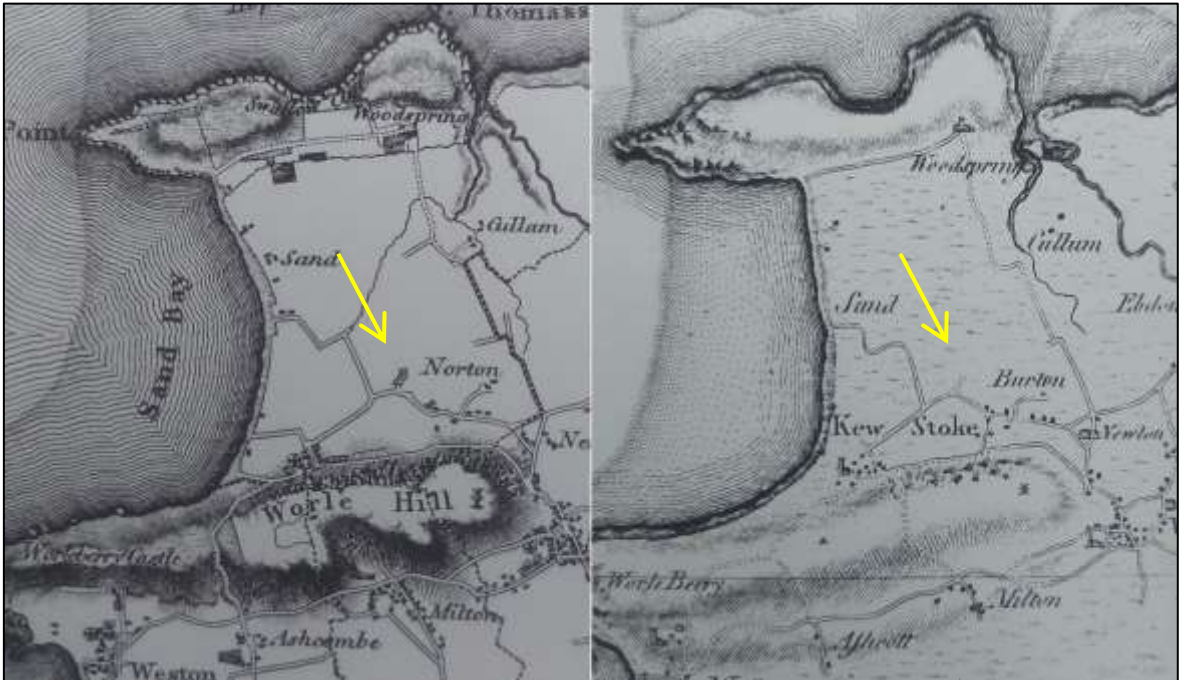


FIGURE 3: EXTRACT FROM THE 1782 DAY AND MASTERS MAP (RIGHT) AND 1822 GREENWOOD MAP (LEFT). THE APPROXIMATE LOCATION OF THE SITE IS INDICATED.

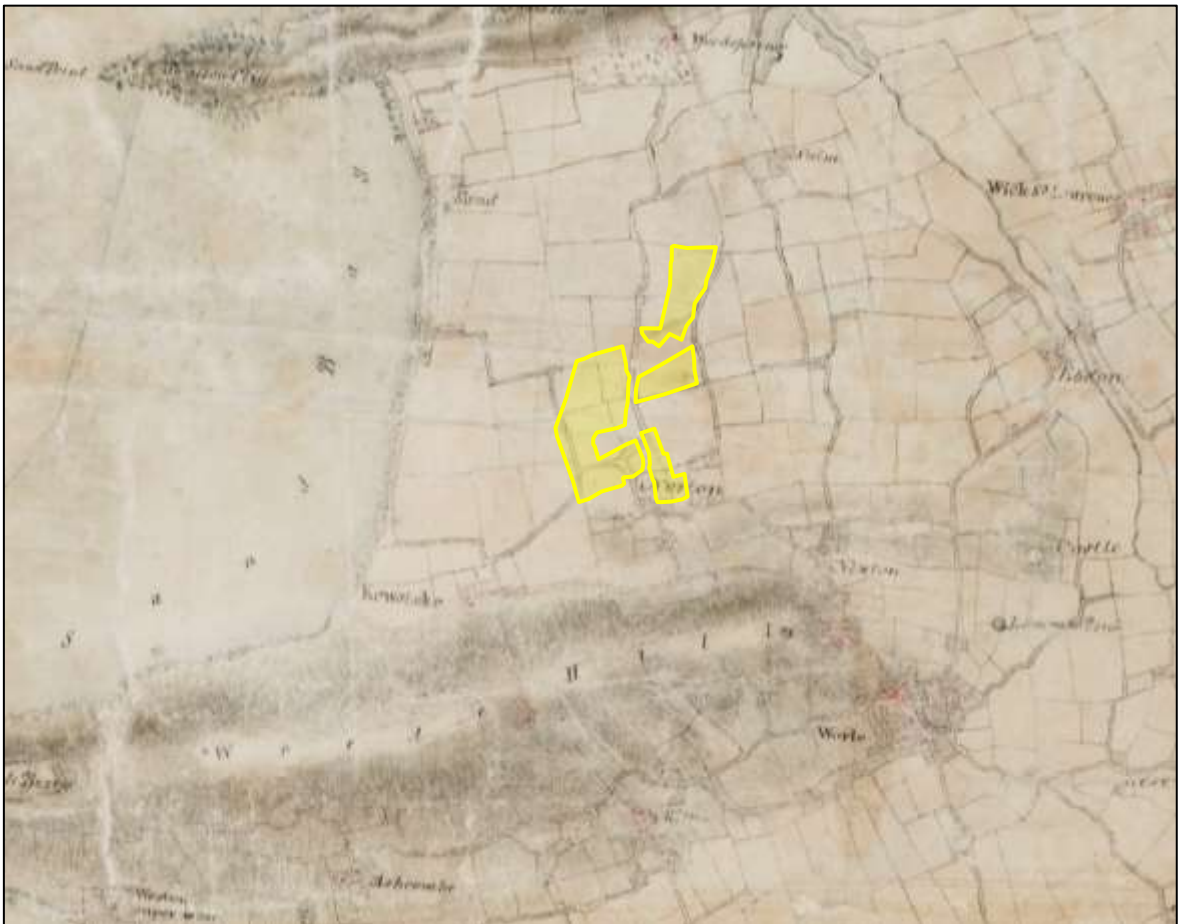


FIGURE 4: EXTRACT FROM THE 1809 ORDNANCE SURVEY (OS) SURVEYOR'S DRAFT MAP OF THE AREA (BL). NOTE THE PLACE-NAMES WITHIN THE PARISH – WESTON, ASHCOMBE, MILTON, NEWTON, NORTON, KEWSTOKE. THE SITE IS INDICATED.

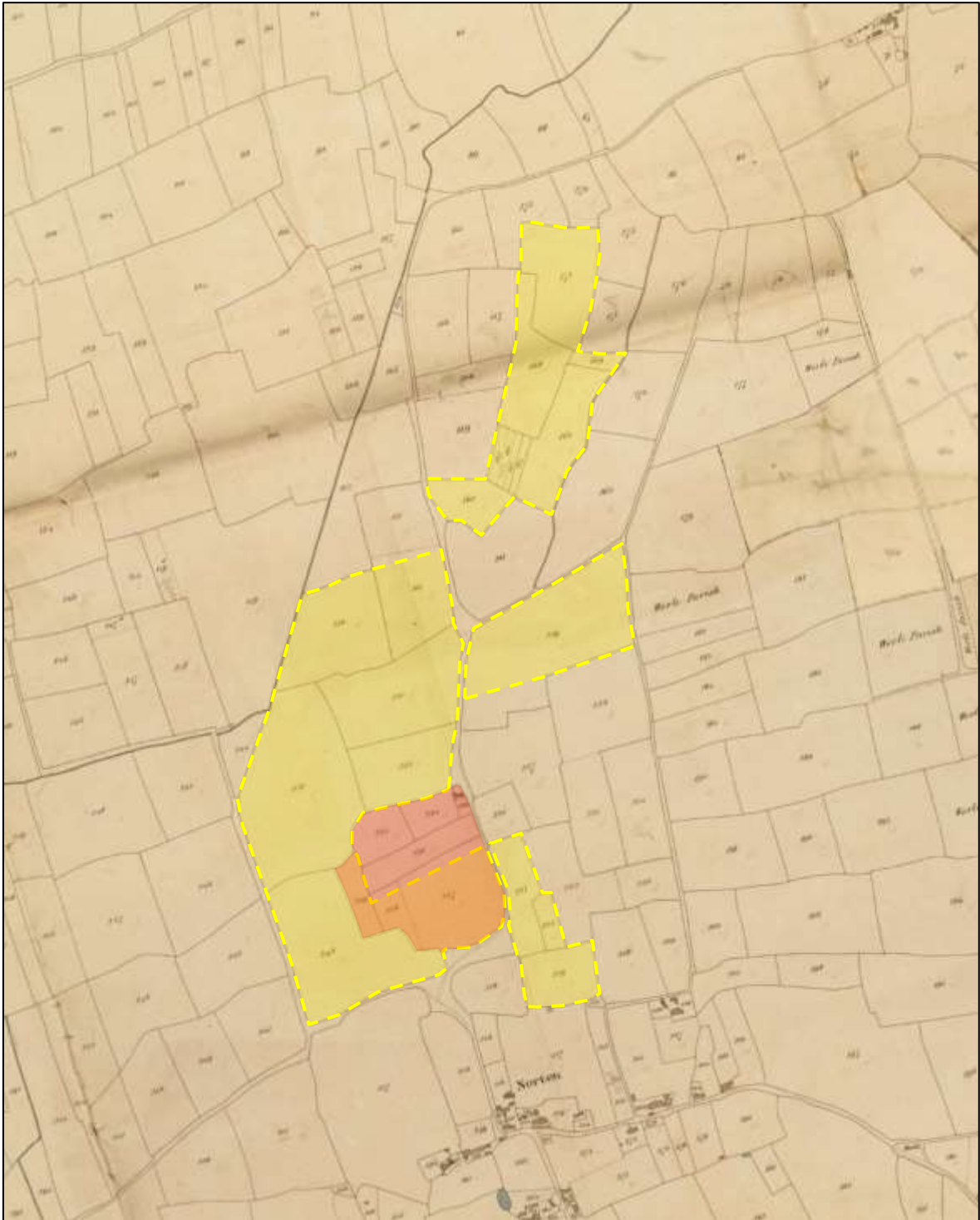


FIGURE 5: EXTRACT FROM THE TITHE MAPS OF KEWSTOKE AND WORLE (KYP). THE SITE IS INDICATED IN YELLOW; *ELMSHAY* FIELD-NAMES SHOWN IN RED.

The first detailed cartographic source is the tithe maps for Kewstoke (c.1840) and Worle (c.1840) (Figure 5). They depict a landscape of broadly rectilinear fields, often arranged in recognizable blocks defined by two long boundaries subdivided into numerous small rectangular parcels. While not depicted as such, most of these field boundaries are wet ditches. This sort of arrangement elsewhere on the North Somerset Level (see Rippon 2006, 110-125), characterised as *coaxial* or *intermediate* under Rippon's schema, with some of the long axes representing fen banks erected during a staged reclamation of the marshland (i.e. note to the east of the site *Foss Lane*).

In terms of dating, *irregular closes*, which are interpreted to represent fields laid out between utilised saltmarsh channels, are uncommon, and this would imply the fields at Kewstoke were *not* laid out during the earliest phases of reclamation. There are no clear oval or sub-circular ‘summer dikes’ as identified by Rippon elsewhere on the Level and the two possible exceptions (Elmsley and Collum) are islands rather than deliberate intakes. The fields characterised as *intermediate* at Banwell (Rippon 2006, 111-112) were laid out in stages that were complete by c.1500 but there are a number of reasons to believe the at Kewstoke landscape had been largely or fully reclaimed by 1086, and that it perhaps therefore followed a slightly different trajectory to the parishes of Banwell, Puxton, and Wick St Lawrence. Firstly, the marshland at Kewstoke was compact enough that it could be effectively exploited by dryland settlements located around its fringe. Secondly, the size and value of the Domesday Manor of Woodspring (with land for 12 ploughs, worth £5 in 1066, to which two manors with 8 ploughs worth £4 had been added by 1086), would imply the cultivation of more than just Swallowcliff. Thirdly, the interdigitation of the parish boundaries between Worle and Kewstoke would suggest they were following existing field or furlong boundaries laid out before they were separated in the 10th century.

TABLE 2: EXTRACT FROM THE TITHE APPORTIONMENT FOR KEWSTOKE (TNA). THE LANDS OF THE LARGER LANDOWNERS ARE COLOURED TO IDENTIFY THEM; ENTRIES IN RED FALL WITHIN THE FOOTPRINT OF THE PROPOSED DEVELOPMENT.

No	Landowner	Occupier	Plot Name	Cultivation
130	Henry Vowls	Henry Sheppard	Leathern Mead	Pasture
132	Pexton Peterson Esq.	Henry Paisley	The Sixteen Acres [pt. Sandbay Farm]	Pasture
149	Pexton Peterson Esq.	Henry Paisley	Holsom Bridge [pt. Sandbay Farm]	Pasture
150	Edward Harley	Daniel Day	Leathern Hill Six Acres	Pasture
151	James Morse	Himself	The Nine Acres [Home Farm]	Pasture
152	Pexton Peterson Esq.	Henry Paisley	The Six Acres [pt. Sandbay Farm]	Pasture
155	James George Esq.	George Clark	Colloms [pt. Sandpoint Farm]	Pasture
156	James George Esq.	George Clark	Leathern Mead [pt. Sandpoint Farm]	Pasture
157	The Rev. Robert Callow Hathway	Himself	The Four Acres [Glebe]	Pasture
158	The Rev. Robert Callow Hathway	Himself	The Two Acres [Glebe]	Arable
159	Pexton Peterson Esq.	Henry Paisley	Stars Five Acres [pt. Sandbay Farm]	Pasture
160	James Morse	Himself	The Two Acres [Home Farm]	Pasture
161	John Hugh Piggott Smythe Esq.	Henry Fry	Leathern Hills [Norton Farm]	Pasture
162	Elizabeth Twitt	Henry Sheppard	The Six Acres	Pasture
163	Pexton Peterson Esq.	Henry Paisley	Stars Four Acres [pt. Sandbay Farm]	Pasture
164	John Hugh Piggott Smythe Esq.	Henry Fry	In Leathern Mead [Norton Farm]	Arable
165	James George Esq.	George Clark	In Leathern Mead [pt. Sandpoint Farm]	Arable
166	The Rev. Robert Callow Hathway	Himself	Leather Mead [Glebe]	Arable
167	John Winter	Thomas Beckington	In Leathern Mead [pt. Sand Farm]	Pasture
168	Elizabeth Twitt	Henry Sheppard	Kisfings Paddock	Pasture
169	Elizabeth Twitt	Henry Sheppard	Sonack Paddock	Arable
170	Sir John Smythe	Henry Bisdee	Browns Four Acres [in Milton]	Pasture
171	The Rev. Robert Callow Hathway	Himself	Red Croft [Glebe]	Pasture
172	James Morse	George Stabbins	Chalmers Six Acres	Pasture
173	James George Esq.	George Clark	Holmead [pt. Sandpoint Farm]	Pasture
174	John Hugh Piggott Smythe Esq.	Henry Fry	Holmead Two Acres [Norton Farm]	Pasture
175	Edward Harley	Daniel Day	Collum Three Acres [pt. Broomlands]	Arable
176	John Hugh Piggott Smythe Esq.	Henry Fry	Bedland Croft [Norton Farm]	Pasture
209	James Morse	Himself	Broadland [Home Farm]	Pasture
210	John Baker Esq.	George Stabbins	The Four Acres	Pasture
211	John Baker Esq.	George Stabbins	Garden, part of Four Acres	Garden
212	The Rev. Robert Callow Hathway	Himself	Clay Hill [Glebe]	Pasture
216	John Hugh Piggott Smythe Esq.	Henry Fry	Orchard [Norton Farm]	Orchard
217	John Hugh Piggott Smythe Esq.	Henry Fry	Home Ground [Norton Farm]	Pasture

No	Landowner	Occupier	Plot Name	Cultivation
218	James Morse	Himself	Silver Leaze [Home Farm]	
219	Elizabeth Twitt	Henry Sheppard	The Three Acres	Pasture
220	John Hugh Piggott Smythe Esq.	Henry Fry	Orchard [Norton Farm]	Orchard
221	John Hugh Piggott Smythe Esq.	Henry Fry	The Paddock [Norton Farm]	Pasture
222	James Morse	Himself	The Paddock [Home Farm]	Pasture
223	John Baker Esq.	George	Two Acres	Arable
224	The Rev. Robert Callow Hathway	Himself	Parsons Four Acres [Glebe]	Arable
225	John Hugh Piggott Smythe Esq.	Henry Fry	The Nine Acres [Norton Farm]	Pasture
226	Sir John Smythe	Henry Bisdee	The Paddock [in Milton]	Pasture
227	James Morse	Himself	Six Acres [Home Farm]	Pasture
228	John Hugh Piggott Smythe Esq.	Henry Fry	The Nine Acres [Norton Farm]	Pasture
229	James Morse	Himself	The Eleven Acres	Pasture
230	John Hugh Piggott Smythe Esq.	Henry Fry	The Nine Acres [Norton Farm]	Arable
231	John Hugh Piggott Smythe Esq.	Henry Fry	The Sixteen Acres [Norton Farm]	Pasture
232	John Hugh Piggott Smythe Esq.	Henry Fry	The Six Acres [Norton Farm]	Pasture
233	John Baker Esq.	Thomas Fry	House and Garden	
234	John Baker Esq.	James Banwell	Part of Elmshay	Pasture
235	Elizabeth Urch	James Banwell	Part of Elmshay	Pasture
236	Susan Harse	James Ellis	Elmshay Two Acres	Pasture
237	Stiverd Jenkins & Martha Williamson	Thomas Hardwick	Elmshay Field [pt. Newton's Farm]	Pasture
238	Daniel Day & Henry Bisdee Churchwardens	Thomas Hardwick	Part of Elmshay Field	Pasture
239	Mary Sheppard	Samuel Sheppard	Elmshay Two Acres	Pasture
240	Elizabeth Twitt	Henry Sheppard	Pimfield Ten Acres	Pasture
241	George Day, Frederick Day, Edward Day, and Samuel Fry	Daniel Day	Days Ground	Pasture
242	James Ezekiel Nash	George Stabbins	Six Acres	Pasture
243	Rev. Robert Jones	William Sheppard	Horse Croft	Pasture
244	James Morse	Himself	Holsome Bridge Acre [Home Farm]	Pasture
245	John Dawking	Daniel Day	Horse Croft	Pasture

Not unsurprisingly given the low-lying terrain, almost all the fields were recorded as being under pasture, the traditional use of this landscape. In the general, the pattern of landholding is highly dispersed, and clear blocks of land held as ring-fence farms absent. The identifiable farms holding land in and around the site are located to the west, on the higher ground next to the sea (Sandbay Farm, Sandpoint Farm, Sand Farm), at Norton (Home Farm, Norton Farm), at Newton, and even a tenement in Milton. This would indicate that, when the marshland was drained and reclaimed, it was a collaborative endeavour and the new fields were allocated to those who took part, or those who had rights to the former common. There is a mixture of tenanted land and owner-occupied land; combined with an active land market this could make identifying earlier holdings difficult. Fortunately, the lands of Woodspring Priory can be identified, as they (eventually) passed to John Hugh Piggott Smythe Esq. This demonstrates that even the holdings of the major landowner could be scattered across the landscape.

In general, most of the field-names are prosaic and straightforward (e.g. *Six Acre*, *Horse Croft*). Several are descriptive (*mead* = meadow) or refer to a place or a person (*Collum Three Acres*, *Days Ground*). Certain elements (*leathern*, *paddock*, *elmshay*) are repeated and indicate an area of land later subdivided. The only field-name elements of interest are *Elmshay* (six fields) and *Leathern* (eight fields). Elmshay, now Elmsley, is of interest as the element -hay could be derived from the Old English (ge)hæg, meaning enclosure. The term was usually applied to enclosures in (originally) wooded country, and in this context should mean a significant enclosure. Alternatively, -hay may

be derived from the Old English *-ey*, meaning island, which would be more appropriate. *Leathern* could mean *land with hard, stubborn soil*, or be derived from the Old English *læfer* meaning rush or reed; both would be applicable (Cavill 2018).

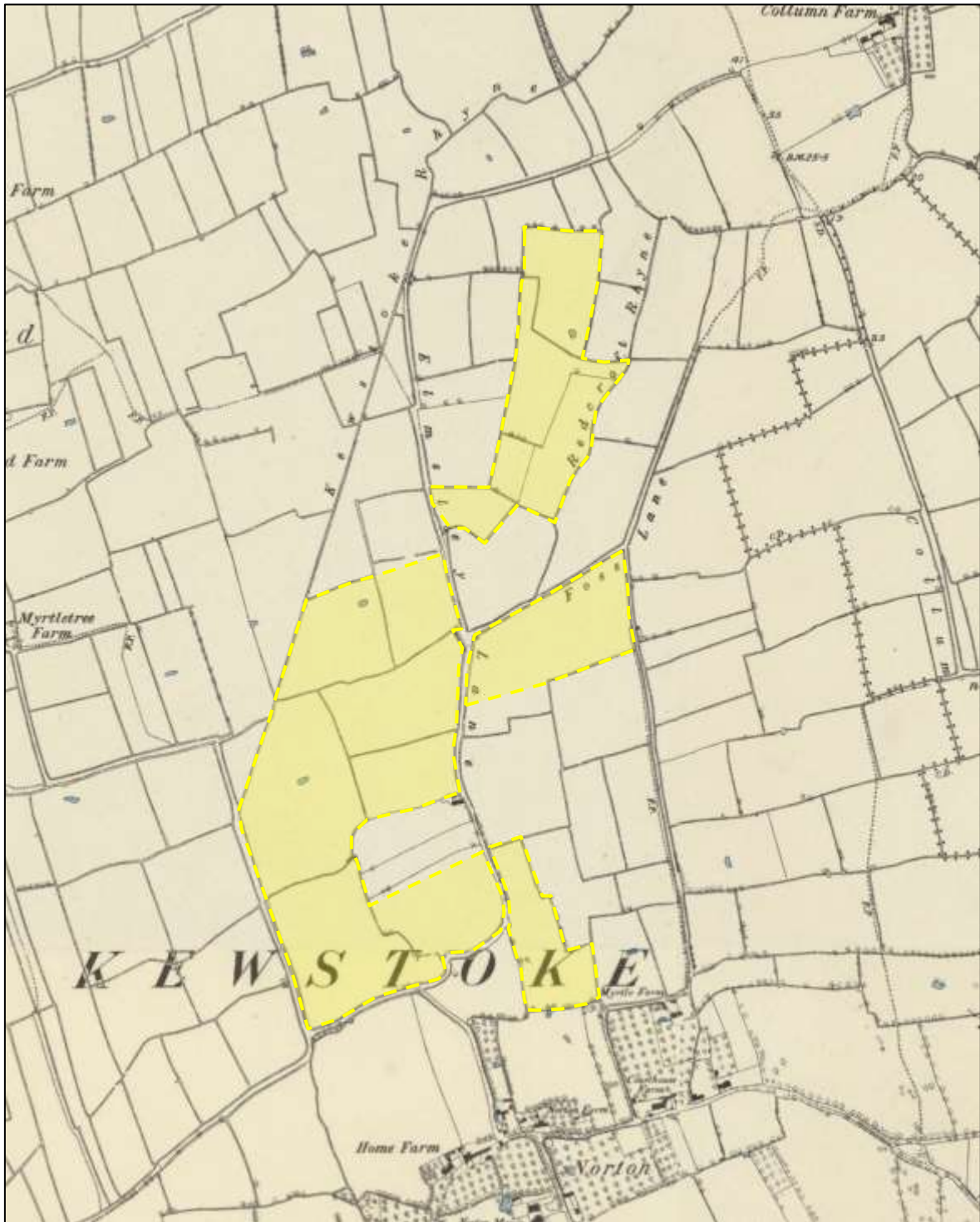


FIGURE 6: EXTRACT FROM THE c.1885 25" OS MAPS OF THE AREA, SURVEYED BETWEEN 1883 AND 1885 (PARTS OF SOMERSET SHEETS IX.8, IX.12, X.5, X.9) (KYP). THE SITE IS INDICATED.

The later historic OS maps (Figures 6 & 7) show a landscape very similar in form and layout. By 1880 some field boundaries had been lost (between tithe field nos. 239 and 240; between 219, 220 and 221; between 168 and 169; and between 164 and 165/166/167) but most of the other fields were unchanged. The small irregular area of common containing the junction of Sand Lane and Elmsley Lane had been enclosed and the adjoining fields expanded over the older boundaries. A small pond

is shown in the middle of field no.231, and a second small pond to the north-east corner of field no.150.



FIGURE 7: EXTRACT FROM THE 1903 25" OS MAPS OF THE AREA, REVISED 1902 (PARTS OF SOMERSET SHEETS IX.8, IX.12, X.5, X.9) (KYP). THE SITE IS INDICATED.

There are no apparent changes shown between 1885 and 1958x63. During the second half of the 20th century the remaining field boundaries between tithe field nos. 160, 163-169 and 172 were removed to create Field F7. The boundary between field nos. 150 and 151 was removed to form Field F6. A fence was inserted to remove a dogleg in the southern boundary of field no. 229 to form Field F5. A nursery was established at Elmsley, and this expanded slightly to the south of the original field boundary to redefine Field F8. In general and more widely, the dispersed character of

landowning has manifested itself in the proliferation of small paddocks with insubstantial farm buildings or stables, 10-12 of which can be found around the site to the east and north.

3.4 LIDAR AND AERIAL PHOTOGRAPHS

Images based on 1m DSM LiDAR data obtained from the Environment Agency can be found in Figures 8-11. Figure 8 shows the general area. The landscape is very flat but is slightly lower-lying to the west and south-west (darker colours), with higher areas along the coastal fringe, at Collum Farm, Elmsley, and to the south (lighter colours).



FIGURE 8: IMAGE DERIVED FROM 1M DSM LIDAR DATA. USED UNDER THE OPEN GOVERNMENT LICENCE 3.0. SITE INDICATED.

The LiDAR imagery is very useful for identifying earthworks even, as in this case, when the fields have been subject to ploughing. Many of the surrounding fields are shown marked by narrow, closely-spaced parallel gripes, or spade-cut surface drainage gullies. These survive in Field F9, and traces are visible in Fields F1, F4, F5, F6, and F7. In Field F6 these gripes are cut by Kewstoke Rhyme and thus predate that watercourse (built pre-1809×22?). Field boundaries lost before 1840 are indistinctly visible in Fields F1, F2, F5, F6, and F7 (see Figures 12-14); these lost field boundaries are congruent with the existing fieldsystem and do not appear to predate it. One element that might be expected but which is not readily apparent is palaeochannels. Only two small channels are visible to the north of the site, following the edge of Collum Farm 'island', with a second indistinct one just to the west. Most of the palaeochannels identified by the geophysical survey do not express themselves as earthworks, only perhaps a very subtle one in Field F2.

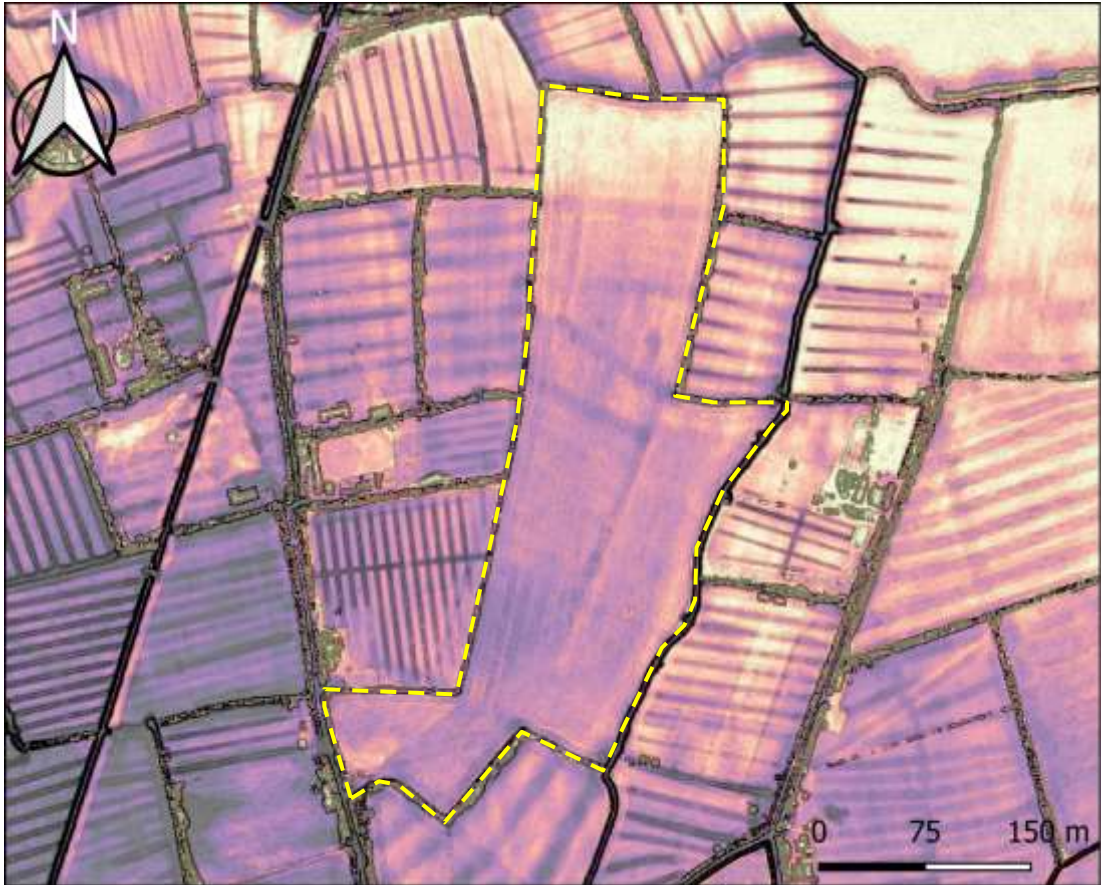


FIGURE 9: IMAGE DERIVED FROM 1M DSM LIDAR DATA. USED UNDER THE OPEN GOVERNMENT LICENCE 3.0. THE COLOUR RAMP (BLACK TO YELLOW) REPRESENT THE CHANGE IN HEIGHT BETWEEN 5.5M AOD AND 6.0M AOD. THE SITE IS INDICATED.

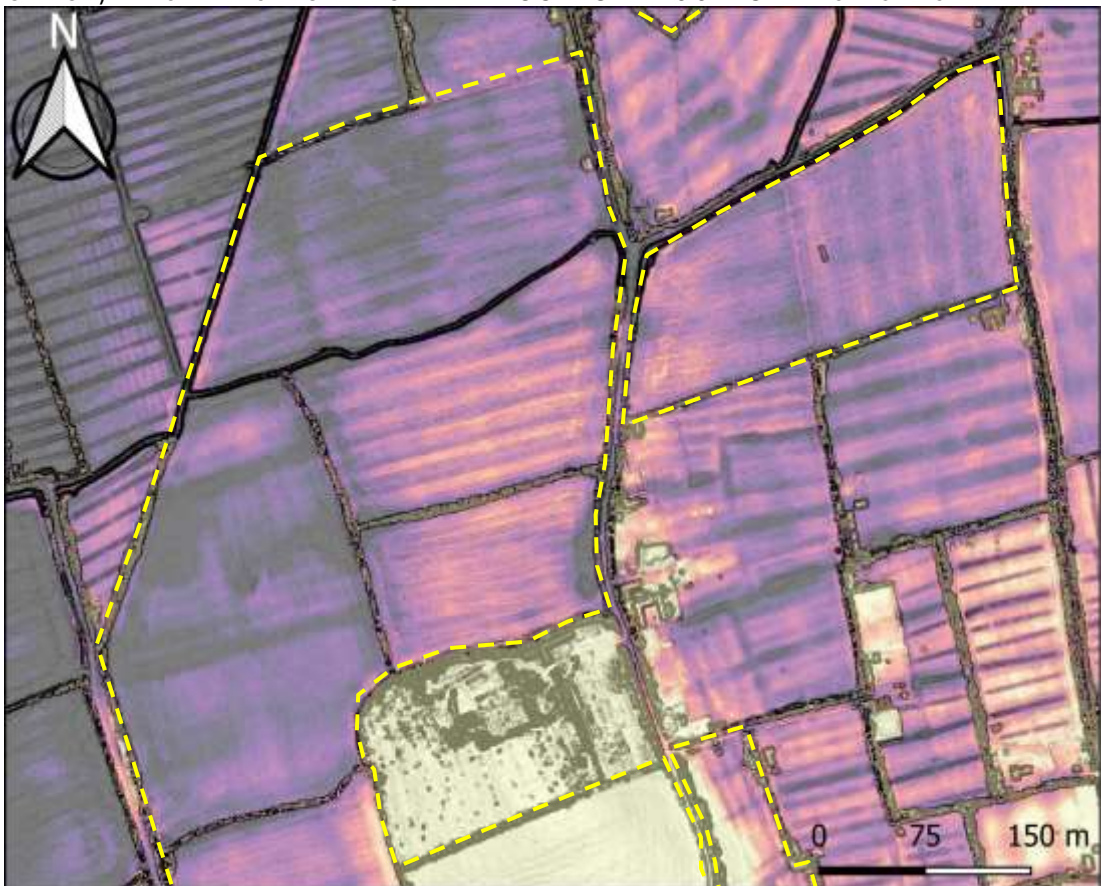


FIGURE 10: IMAGE DERIVED FROM 1M DSM LIDAR DATA. USED UNDER THE OPEN GOVERNMENT LICENCE 3.0. SITE INDICATED.

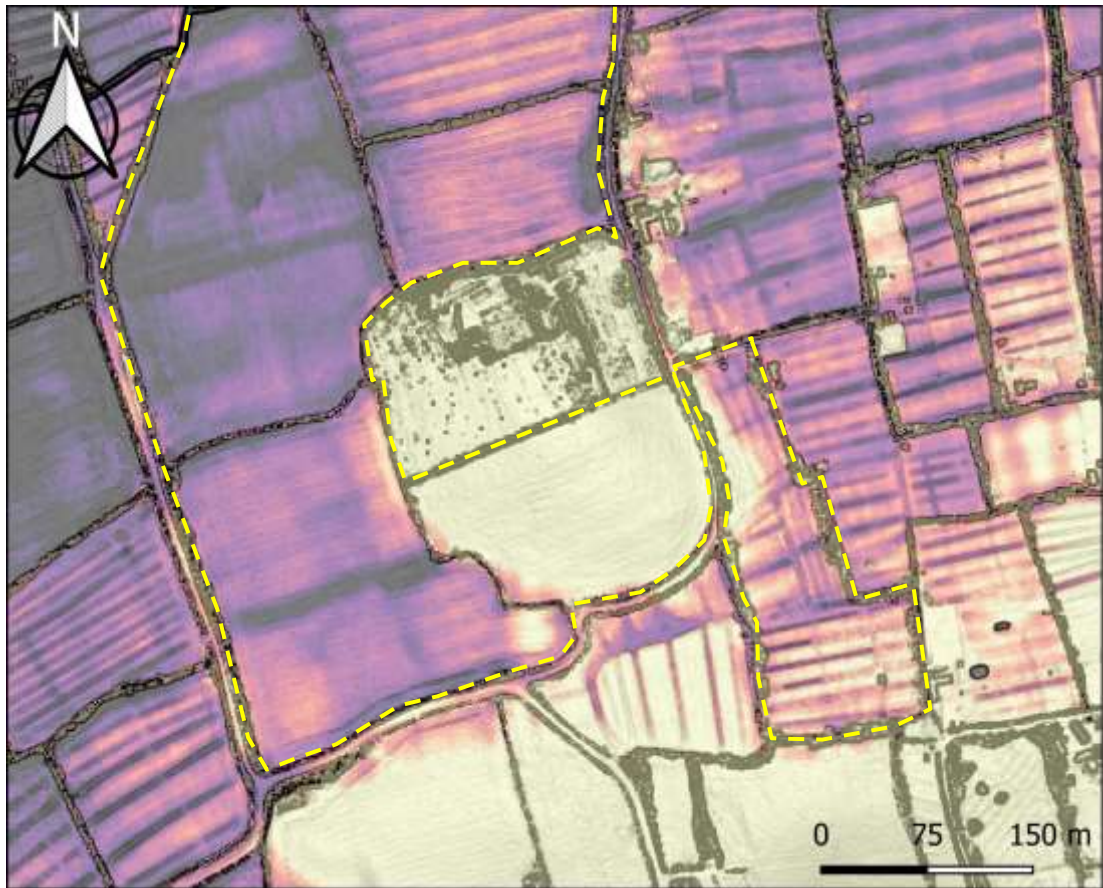


FIGURE 11: IMAGE DERIVED FROM 1M DSM LIDAR DATA. USED UNDER THE OPEN GOVERNMENT LICENCE 3.0. SITE INDICATED.

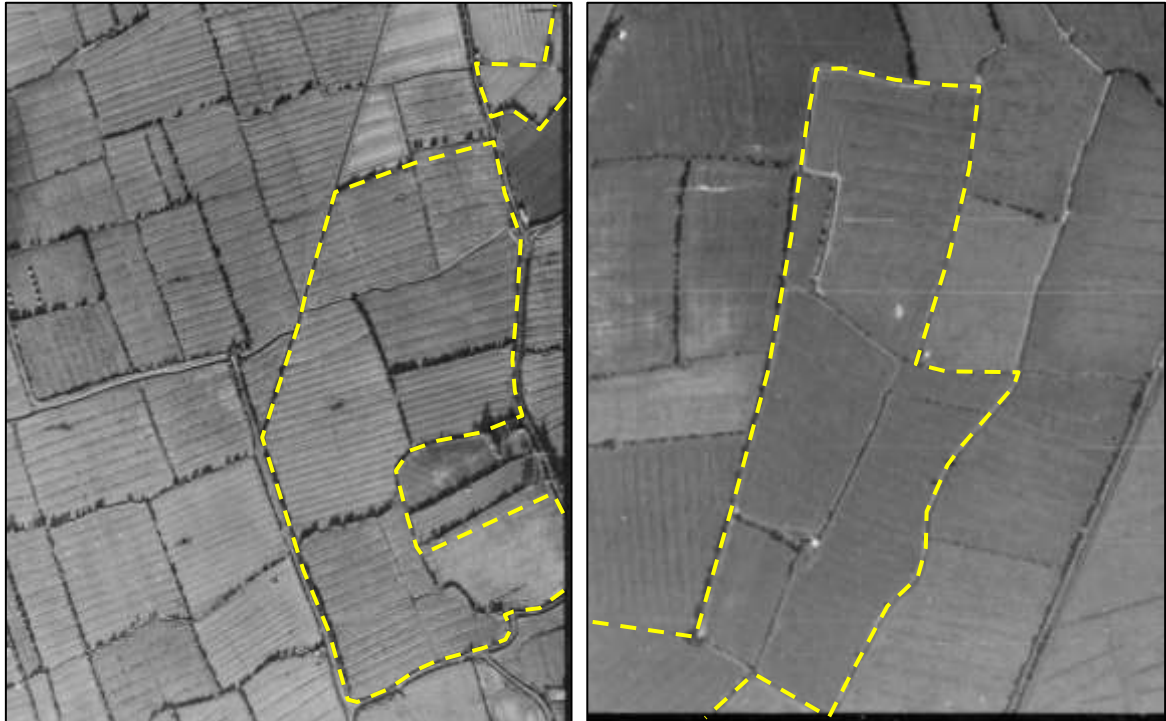


FIGURE 12: 1946 RAF PHOTOGRAPHS OF THE AREA; THE SITE IS INDICATED. LEFT: RAF_CPR_UK_1869_RS_4153; RIGHT: RAF_106G_UK_1661_RP_3285.

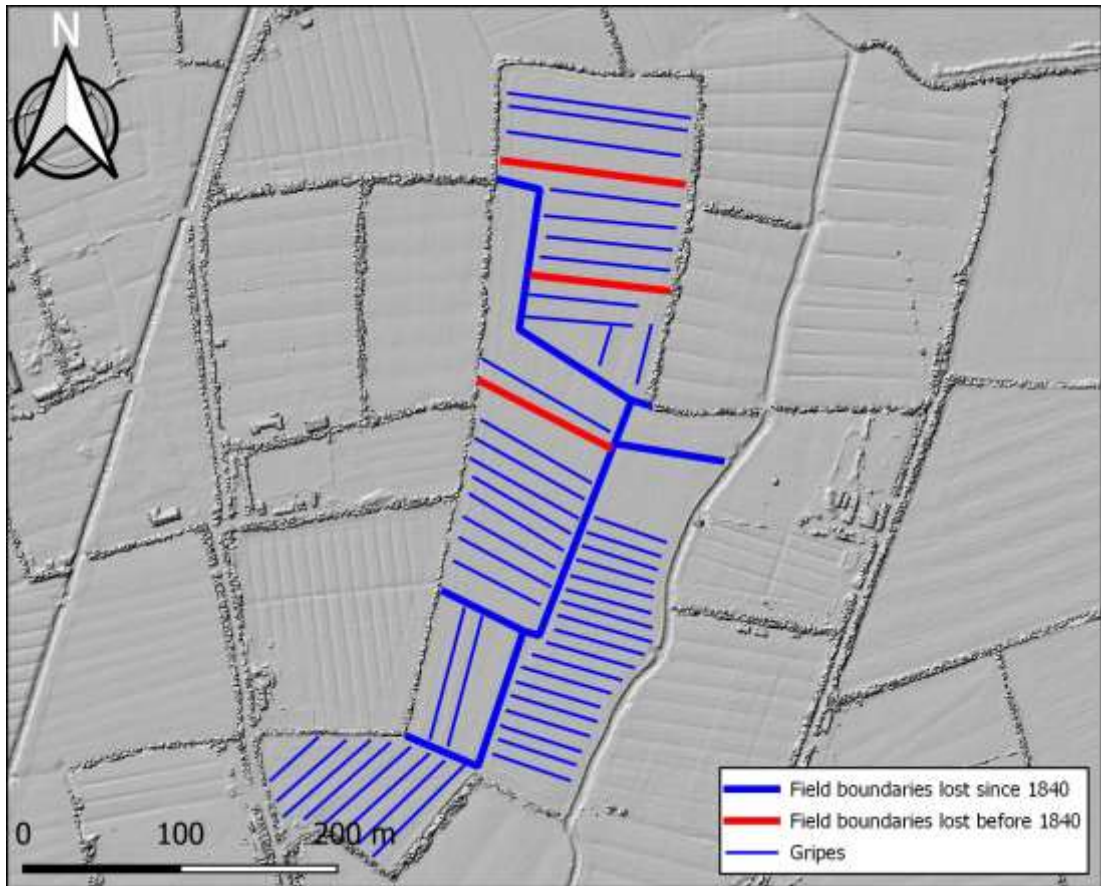


FIGURE 13: IMAGE DERIVED FROM 1M DSM LIDAR DATA SHOWING RELICT FEATURES; LIDAR DATA PRESENTED AS A HILLSHADE. DATA USED UNDER THE OPEN GOVERNMENT LICENCE 3.0.



FIGURE 14: IMAGE DERIVED FROM 1M DSM LIDAR DATA SHOWING RELICT FEATURES. DATA USED UNDER THE OGL 3.0.

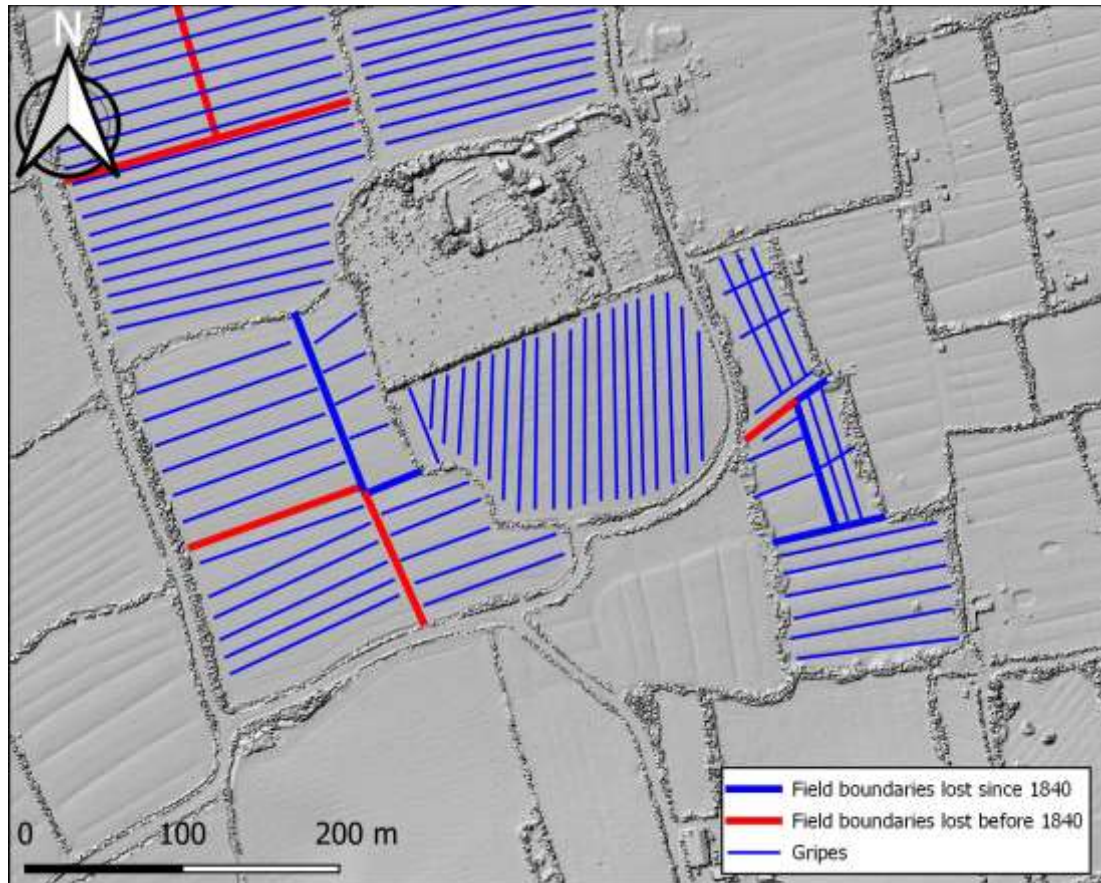


FIGURE 15: IMAGE DERIVED FROM 1M DSM LIDAR DATA SHOWING RELICT FEATURES. DATA USED UNDER THE OGL 3.0.

Recent commercially-available aerial photographs of the site show the same set of features showing as cropmarks, soilmarks and parchmarks, with gripes and known relict field boundaries identifiable in all nine fields during the period 1999-2020. On the 1946 aerial photographs these all survive as clear earthworks (Figures 12-13). Interpretation in Figures 14-15.

3.5 ARCHAEOLOGICAL BACKGROUND

The amount of archaeological fieldwork that has been undertaken in this area is very limited. A small geophysical survey (YCCART 2012; 2021) and a watching brief (BaRAS 2010) has been undertaken Woodspring Priory, two trench evaluations have been undertaken at holiday parks in Sand Bay (Williams 1999, 106-7; 2001, 123), and the area is covered by the National Mapping Programme (Crowther & Dickinson 2008). A number of intrusive investigations have been undertaken further away, in Worle (the closest being: Substrata 2021; ACA 2022) and as part of the Western Urban Villages Strategic Flood Solution (Substrata 2012; ACA 2016). This reflects a general lack of development in this part of North Somerset. The land here is determined by the North Somerset Historic Landscape Characterisation (HLC) to be post-medieval enclosures (15th-17th century), organised enclosures on anciently reclaimed inland moor, with Field F8 forming an extension of the *late medieval enclosed open fields created by local agreement and exchange* that surround the farmsteads at Norton. While the latter is probably correct, the former is not, and those fields were probably laid out during the medieval period if not before.

3.5.1 PREHISTORIC 4000BC - AD43

There is very little evidence of Prehistoric activity in this area within 1km of the site: four findspots (all on the hillslopes to the south at Worle) and a cave/rock shelter exposed and destroyed by quarrying (MNS190). This reflects the fact that the greater part of the study area was intertidal

marsh for the whole of this period; the Middle Wentlooge peat developed during the Neolithic (see dates in Quest 2019), and the subsequent Upper Wentlooge formation (a sequence of 3-4m of alluvial clays) was deposited during the Bronze and Iron Age. However, these landscapes were *not* uninhabited, and the fen edge was highly attractive for settlement (as excavations at Oldmixon Road, Meadfields, and Banwell attest, see: ACA 2018; Axbridge Caving Group 1967; Border Archaeology 2017; Foreman 2020; SWARCH *forthcoming a* and *forthcoming b*). A lack of fieldwork is responsible for this bias. There are also two Bronze Age barrows on Swallowcliff near Sandpoint (National List no. 1008115) c.1.8km to the north-west, and Worlebury hillfort c.2.7km to the south-west (see Bowden 2019).

3.5.2 ROMANO-BRITISH AD43 – AD409

The Romano-British period is largely unrepresented, with only two findspots dating to this period. Again, this reflects the extent of the study area and a lack of fieldwork. Evidence from elsewhere in North Somerset (see Rippon 2006) would suggest the Level had been enclosed and reclaimed in the later Roman period. This is evidenced by the fragmentary survival of Roman fieldsystems in the backfen and the presence of a buried land surface in areas that were subject to flooding in the post-Roman period. As for the later Prehistoric period, the fen edge was favoured for settlement. Tellingly, one of the two findspots of Roman material (*Roman pottery and coins* MNS2725) comes from Lower Norton Lane, only c.50m to the south of the site, and Roman pottery was recovered in Field F9 during the walkover survey. This would indicate the presence of Roman activity on the edge of the 'island' of slightly raised ground now occupied by Elmsley Nursery.

3.5.3 MEDIEVAL AD410 – AD1540

Following the end of the Roman period the Level reverted to marshland as the sea walls failed, and 0.5-1.0m of clean alluvial clays were laid down across the Roman land surface. The landscape was then reclaimed through the piecemeal enclosure of individual blocks of land over the course of the Late Saxon and medieval period. Unlike other parts of the Level, the close proximity of dry land, the raised coastal barrier along sandy Bay, and the islands at Elmsley and Collum, ensured that the saltmarsh could be exploited by adjacent communities/farms and settlement (in the form of sub-circular *summerdikes*) was not required. The regularity of the fieldsystems here would suggest reclamation did not take place during the earliest phase, but the complex interdigitation of the parish boundaries of Kewstoke and Worle would suggest it was largely complete by the tenth century. The highly complex pattern of landholding and tenancy evidenced by the mid-19th century tithe survey would imply enclosure was achieved through communal enterprise rather than lordly fiat. The land held by John Hugh Piggott Smythe Esq. in 1840 are likely to be those of Woodspring Priory, indicating even the lands of a major monastic landholder were widely dispersed.

The religious and tenorial layout of the landscape was also established during this period, with settlements at Kewstoke, Norton, Woodspring, Collum, and probably Sandbay existing as separate tenorial entities. It has been suggested that all these settlements once formed part of an early medieval estate based on Worle/Worlebury (Rippon 2006, 136), and the repetition of subordinate place-name elements (*west-tūn*, *mil-tūn*, *kew-stoc*, *nor-tūn*, *new-tūn*) would support this. The farmhouses of Norton Court and Rose Tree are Listed as 17th century in origin, but Rippon (2006, 156-181) determined many of the Listed and unListed structures in adjacent parishes had medieval origins.

In terms of the non-designated sites listed on the HER, the possible Late Saxon infield at Elmsley (MNS3133) is noted. It is unclear what this represents, and the partial subcircular enclosure here is not a *summerdike* (which were embanked enclosures in the marsh) – it is defined by the terrain, with is up to 4m higher than the surroundings. Also, the garbled account of a 'pit chamber' excavated in the 19th century on the slopes of Worlebury Hill (MNS7815). Not unexpectedly, there is a concentration of medieval records for Norton, Kewstoke, and Woodspring, and a scatter across

the eastern part of the Level, representing settlements with medieval antecedents, findspots, and earthwork remains interpreted as earlier fieldsystems or plough ridges.

3.5.4 POST-MEDIEVAL AD1540 -1899

The greatest number (32) of entries in the NSHER are dated to the post-medieval period and mainly represent farmsteads, structures, and the sites of structures (23), boundary stones (5), quarries (3) and a sluice (1). Most of these entries have been generated from the 19th century OS maps. In overall terms the most significant development during this period was the transfer of the lands of Woodspring Priory to secular owners, for most of this period the Piggott Smythe family. However, the layout of the fields – constrained by the physical characteristics of the Level – did not change. The many drainage gripes that survive here probably date to this period (note that these drainage systems form part of Historic England Monument Nos. 1460846 and 1460940, as part of the 2008 NMP report). The one key element that must belong to the 18th or 19th century is the Kewstoke Rhyme, which cuts across the grain of the earlier fieldsystems and does not appear to be shown on the 1809 OS draft map.

3.5.5 MODERN 1900-PRESENT AND UNKNOWN

The 'modern' entries in the NSHER dominated by WWI and WWII emplacements and features, with a K6 Listed telephone box (MNS4849), holiday camp (MNS7735), and tea room (MNS7816). The two undated features are sub-rectangular enclosures and subcircular depressions at Collum Farm (MNS1742-3).

TABLE 3: TABLE OF NEARBY HERITAGE ASSETS (SOURCE: NORTH SOMERSET HER).

No	Type	Number	Description	Date
1	MON	MNS190	Worle Cave. Rock shelter destroyed by quarrying. Mesolithic microliths and sherds of Iron Age pottery recovered in 1960	Meso
2	FS	MNS7817	Neolithic stone axe head	Neo
3	FS	MNS148	Flint arrowhead south of Norton	BA
4	FS	MNS7870	Middle BA palstave, Hatley	BA
5	FS	MNS9257	Late Bronze Age looped and socketed axe	BA
6	FS	MNS140	Late or post-Roman silver fibula brooch	RB
7	FS	MNS2725	Roman pottery and coins, Lower Norton Lane	RB
8	MON	MNS3133	Possible late Saxon 'infield' at Elmsleigh	Emed
9	MON	MNS7815	'Pit-chamber' excavated at Monks Steps	Emed
10	MON	MNS1283	Tithe Barn at Woodspring Priory. C14 stone rubble walls, replica roof	Med
11	BLD	MNS138	St Paul's Church, C12, C13, C14 and C15 stonework. Listed GI	Med
12	MON	MNS139	St Kew's Steps. Series of rough stone steps in varying condition. Excavation of a masonry 'pit' in the C19 recovered a 'Saxon' knife and 'Celtic' pot	Med
13	MON	MNS1396	Chapel to St Thomas Beckett	Med
14	FS	MNS149	Medieval spearhead north of Hatley Rocks	Med
15	MON	MNS1741	Shrunken settlement at Sandbay Farm	Med
16	MON	MNS1744	Cropmarks of ridge and furrow, enclosed by banks	Med
17	MON	MNS1746	Possible fieldsystem and trackway, possibly predating existing fields	Med
18	MON	MNS2732	14th century seal matrix, Lower Norton Lane	Med
19	MON	MNS3135	Norton Farm, Norton	Med
20	MON	MNS4848	St Paul's Churchyard, C11-C16	Med
21	MON	MNS4981	Possible manorial enclosure at Kewstoke, C11-C16	Med
22	MON	MNS5013	Norton Court Farmhouse	Med
23	MON	MNS5015	Former Norton Manor Farm	Med
24	MON	MNS5016	Myrtle Farm, Norton	Med
25	MON	MNS5206	Cropmarks, related to Priory site	Med
26	MON	MNS7847	Pottery scatter, W of Norton Farm	Med
27	MON	MNS805	Infirmery at Woodspring Priory. C15, restored	Med
28	BLD	MNS808	Home Farm, Norton	Med
29	MON	MSD2241	Occupation at Collum from the medieval period, potentially (sub)manorial	Med
30	BLD	MNS192	Worle windmill. Probably C18 in date, replacing an earlier timber building. Converted to observatory folly in 1876	PM
31	MON	MNS2830	Site of house and garden, Crook's Lane	PM
32	MON	MNS3451	18th century Norton House, Norton	PM
33	BLD	MNS3452	The former Rose Farmhouse with cottages and outbuildings, post-medieval	PM
34	MON	MNS4705	Site of post medieval Myrtle Tree Farm, Sand Bay	PM
35	BLD	MNS4780	Owl's Nest cafe, formerly Home Farm, post-medieval farmstead, Listed GII	PM

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No	Type	Number	Description	Date
36	BLD	MNS4850	C17 Poor House, now the village hall	PM
37	BLD	MNS4851	Victory Cottages, C18	PM
38	MON	MNS4978	Site of a Nonconformist 'tin church' on Crooks Lane	PM
39	BLD	MNS4979	The New Inn, public house	PM
40	MON	MNS4980	Site of Home Farm, post-medieval farmstead	PM
41	MON	MNS5014	17th century Rose Tree Cottages, Norton	PM
42	MON	MNS6909	Huckers Bow, post-medieval sluice	PM
43	MON	MNS6919	Boundary stone 420m SSW of kennels	PM
44	MON	MNS6920	Collum Farm. Post-medieval farmstead	PM
45	MON	MNS6921	Stone marked on 1st and 2nd edition OS maps	PM
46	MON	MNS6922	Stone outside Newtons	PM
47	MON	MNS6923	Boundary stone marked on 1st edition OS map	PM
48	BLD	MNS6924	Old Manor Inn (formerly Manor Farm). Post-medieval farmstead	PM
49	MON	MNS6925	Old quarry marked on 2nd edition and 3rd revision OS maps	PM
50	MON	MNS6942	Boundary post	PM
51	MON	MNS6943	Site of a lime kiln at Milton Hill Quarry	PM
52	MON	MNS6944	Site of gas holder at Florence Cottage marked on 1st edition OS map	PM
53	MON	MNS6945	Site of limekiln and quarry opposite Norton Lane	PM
54	MON	MNS6946	Old quarry at rear of 92, Kewstoke Road	PM
55	MON	MNS6947	Site of smithy at Hatley Garage	PM
56	MON	MNS6948	Old quarry at 80, Kewstoke Road	PM
57	MON	MNS6951	Sand Farm, Sand Bay, depicted on 1st edition OS map	PM
58	MON	MNS6952	Site of house at Elmsley Nursery	PM
59	MON	MNS6953	Ruined barn 400m NE of Elmsley nursery	PM
60	MON	MNS6954	Ruined building on Collum Lane	PM
61	MON	MNS6956	Sandbay Farm, Sand Bay, depicted in 1st edition OS map	PM
62	MON	4580	Site of a WWII LAA battery	Mod
63	MON	MNS3540	Site of a WWII HAA gun battery	Mod
64	MON	MNS4579	Site of WWII buildings servicing the gun battery	Mod
65	BLD	MNS4594	Air Raid Warden post at Kewstoke Vicarage	Mod
66	BLD	MNS4849	K6 telephone box, Listed GII	Mod
67	MON	MNS7734	Site of WWI practice trenches	Mod
68	MON	MNS7735	Pontin's Holiday Camp, Kewstoke	Mod
69	MON	MNS7736	Site of Kewstoke (Auxiliary) Fire Brigade	Mod
70	MON	MNS7737	WWI practice trenches in the fields by Clyntonville	Mod
71	MON	MNS7816	Site of the Monk's Rest tea room	Mod
72	MON	MNS1742	Subcircular depression west of Collum Farm, probable pond	Unk
73	MON	MNS1743	Group of five sub-rectangular enclosures north of Collum Farm	Unk

TABLE 4: EVENT DATA FOR THE ARCHAEOLOGICAL INVESTIGATIONS WITHIN 1KM OF THE PROPOSED SITE.

No	Type	Name	No.
1	EIA	Sand Bay Holiday Village environmental statement	ENS1313
2	Heritage Statement	Country View Holiday Village heritage statement	ENS1535
3	Article	A late medieval graffito from Woodspring Priory	ENS565
4	Geophysical Survey	Gradiometer and resistance surveys at Woodspring Priory	ENS693
5	Article	Some 18 th century finds from Woodspring Priory	ENS611
6	Watching Brief	Sand Road replacement water main	ENS2062
7	Evaluation	Evaluation at Pontin's Sandy Bay	ENS1100
8	Evaluation	Evaluation at Pontin's Sandy Bay	ENS1100
9	Evaluation	Evaluation at Sand Bay Holiday Park	ENS1154
10	Geophysical Survey Evaluation	Gradiometer survey and evaluation trenching at Anson Road	-

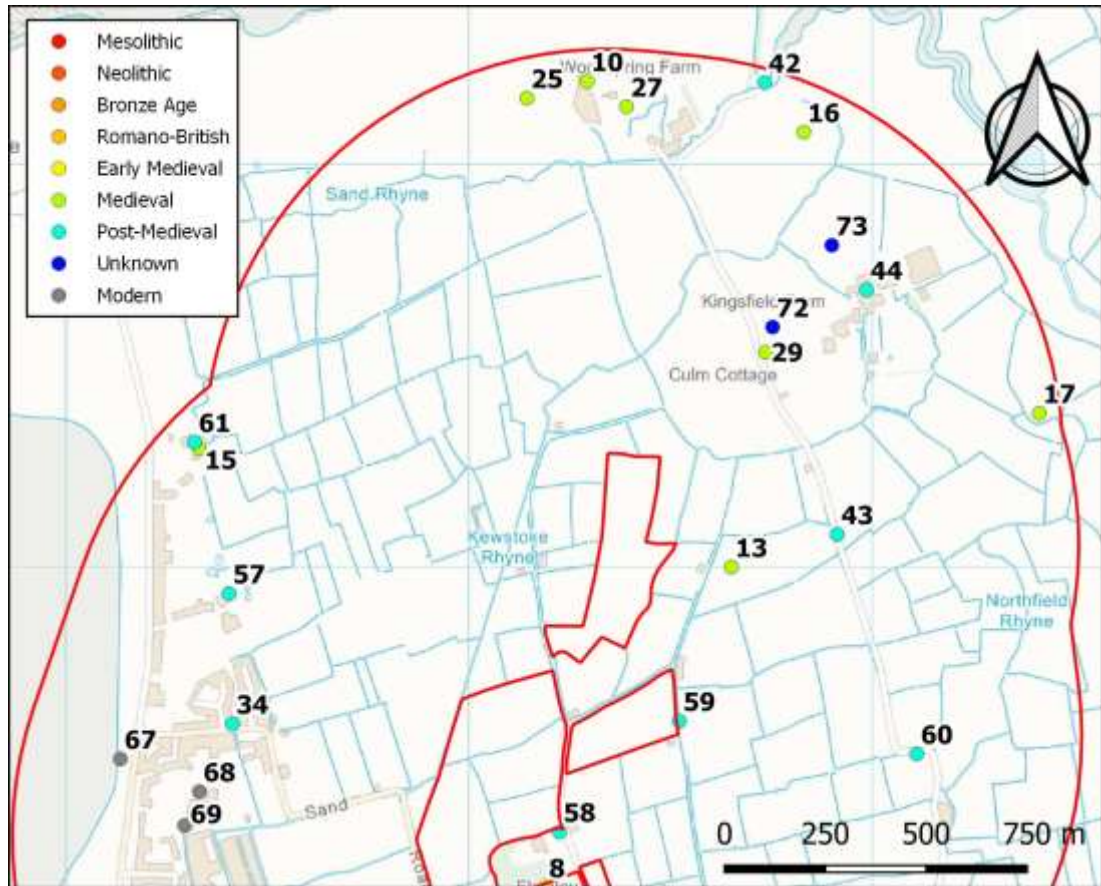


FIGURE 16: HERITAGE ASSETS WITHIN 1KM OF THE SITE (NORTH) RECORDED IN THE NORTH SOMERSET HER. CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2022.

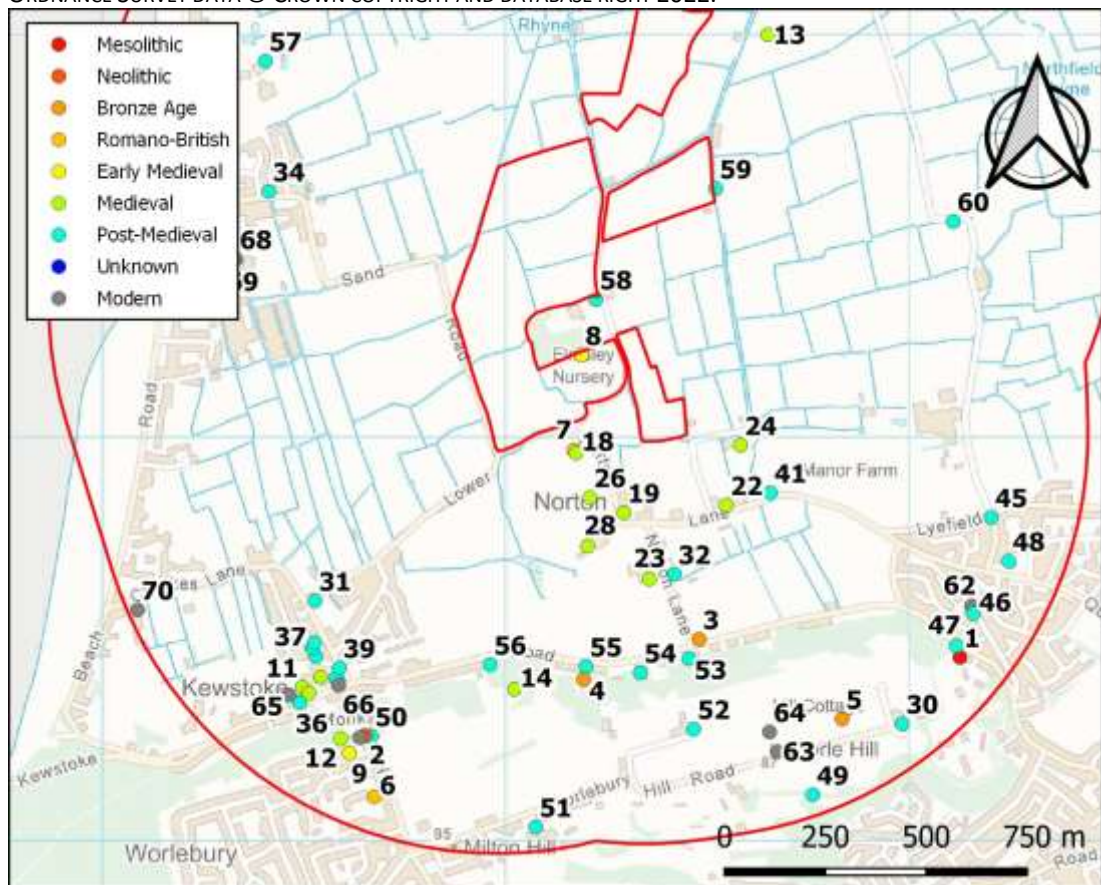


FIGURE 17: HERITAGE ASSETS WITHIN 1KM OF THE SITE (SOUTH) RECORDED IN THE NORTH SOMERSET HER. CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2022.

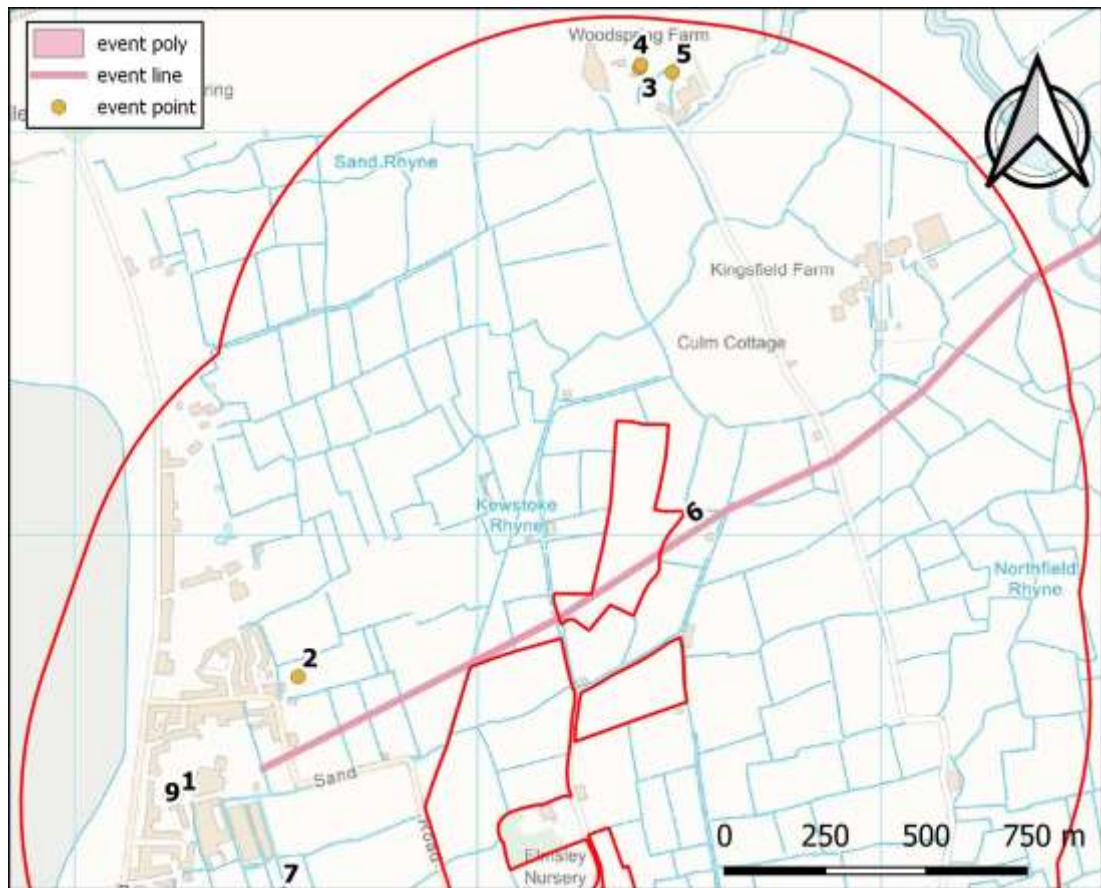


FIGURE 18: EVENT DATA FOR SITES WITHIN 1KM OF THE SITE (NORTH) RECORDED IN THE NORTH SOMERSET HER. CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2022.

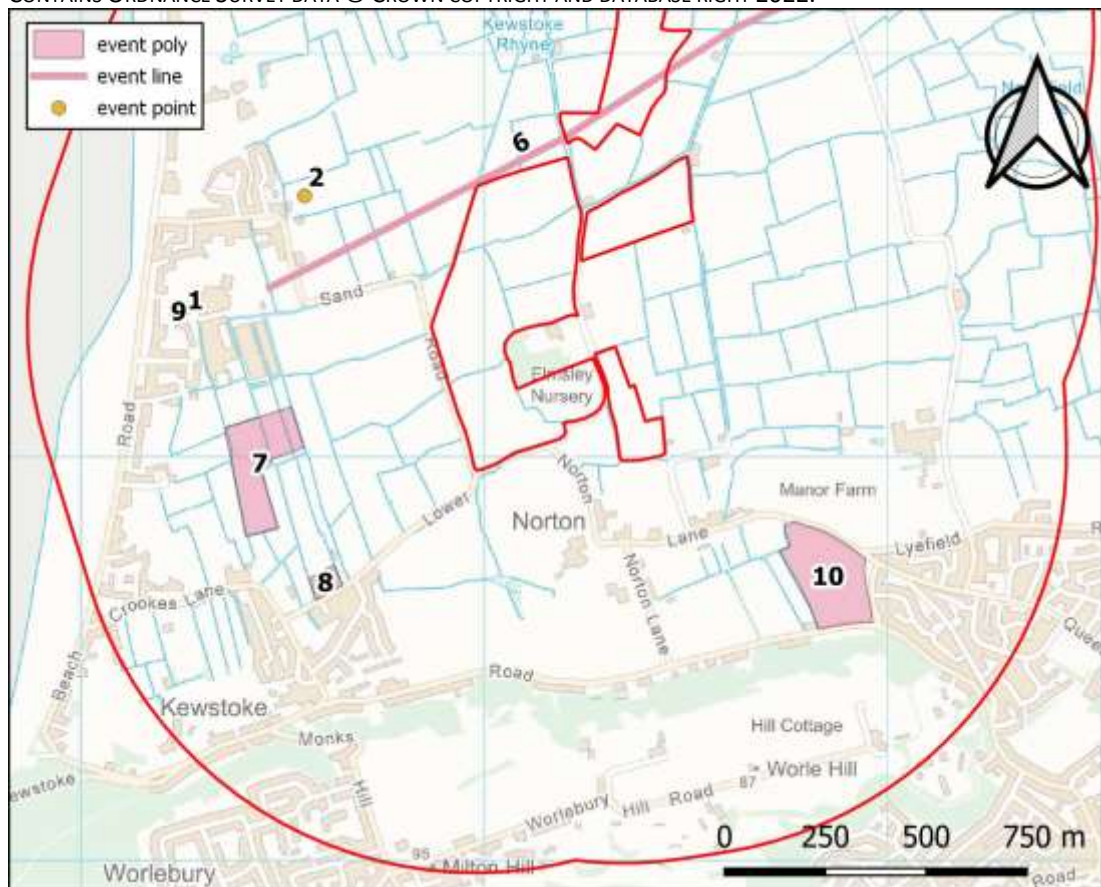


FIGURE 19: EVENT DATA FOR SITES WITHIN 1KM OF THE SITE (SOUTH) RECORDED IN THE NORTH SOMERSET HER. CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2022.

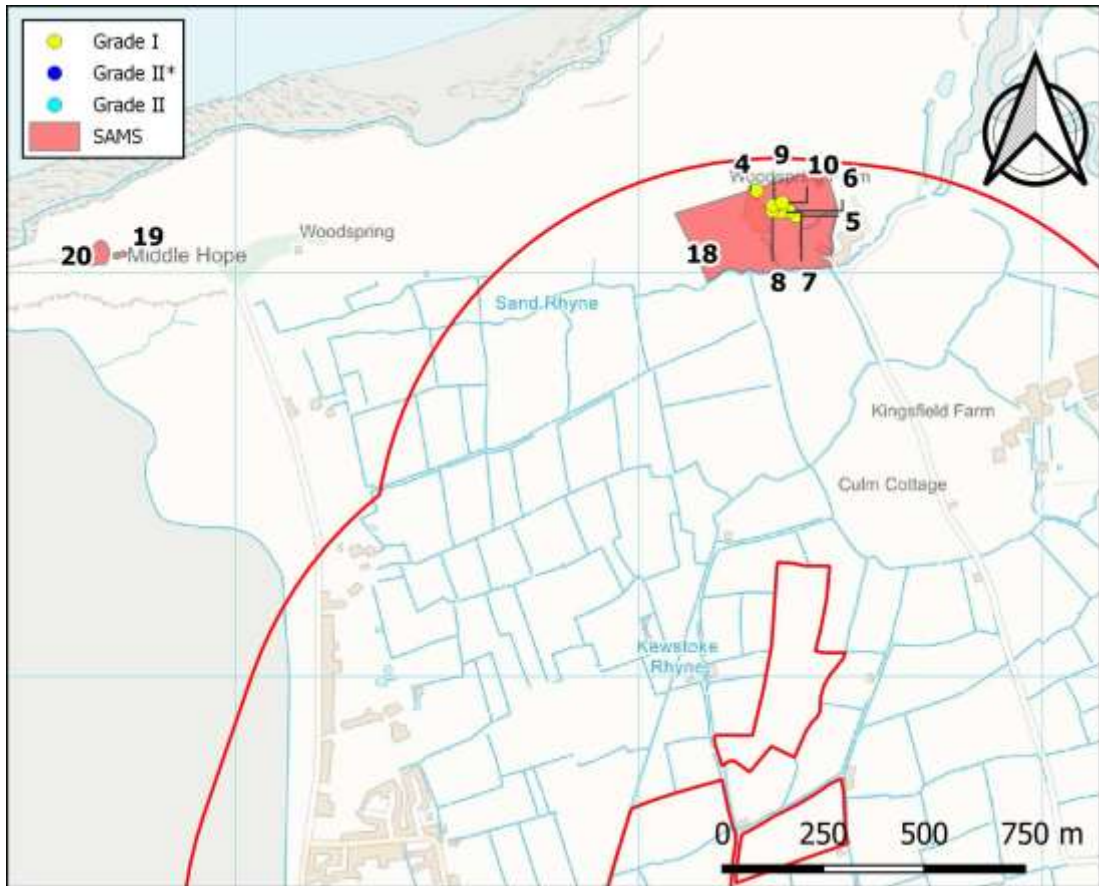


FIGURE 20: DESIGNATED ASSETS WITHIN 1KM OF THE PROPOSED SITE (NORTH) (© HISTORIC ENGLAND 2022). CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2022.

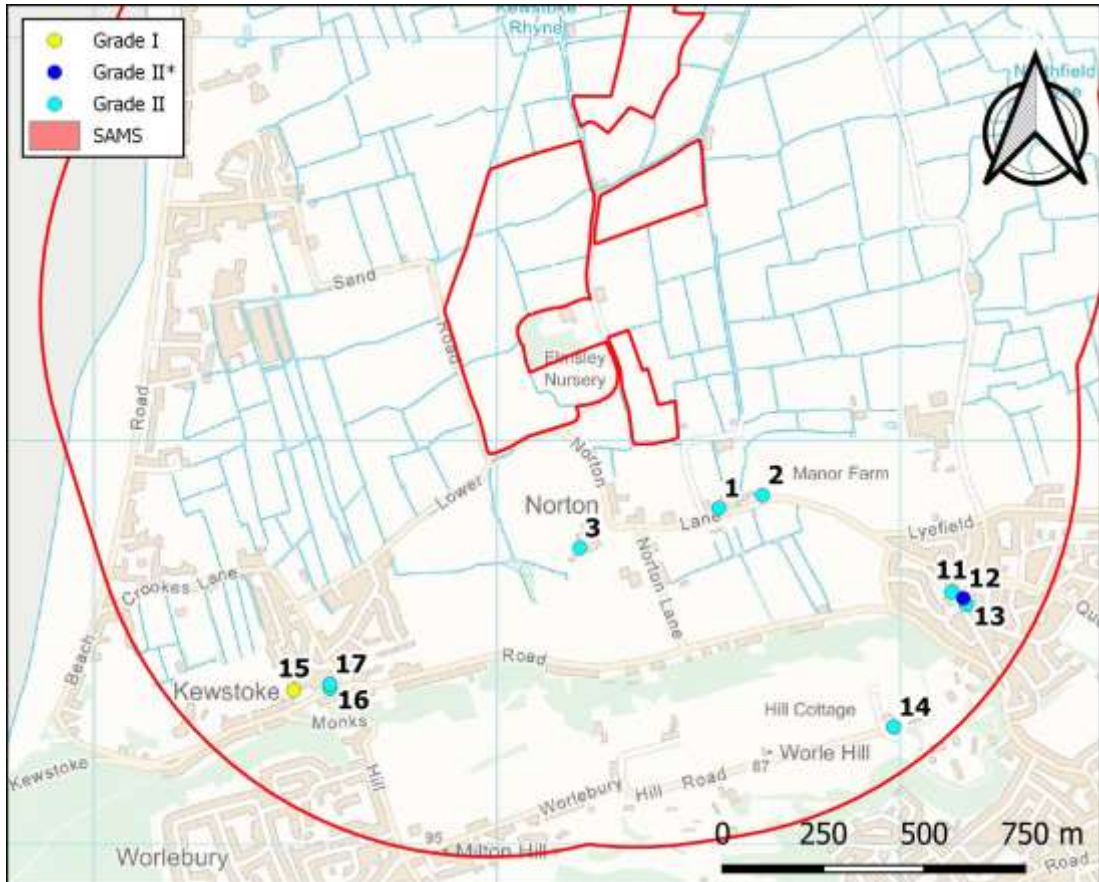


FIGURE 21: DESIGNATED ASSETS WITHIN 1KM OF THE PROPOSED SITE (SOUTH) (© HISTORIC ENGLAND 2022). CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2022.

TABLE 5: DESIGNATED ASSETS WITHIN 1KM OF THE PROPOSAL AREA. SITES IN GREEN CONSIDERED IN THE HIA BELOW.

No	List Entry	Name	Grade
1	1129765	Norton Court Farmhouse	II
2	1156243	Rose Tree Farmhouse	II
3	1156229	Holme Farmhouse	II
4	1129768	Barn at Woodspring Priory	I
5	1156326	Infirmary at Woodspring Priory	I
6	1320653	West Wall of Chapter House, Woodspring Priory	I
7	1302945	East Cloister Wall	I
8	1129767	Gatehouse, Gates, Mounting Block, and Wall	I
9	1129766	Farmhouse Range at Woodspring Priory	I
10	1320691	Woodspring Priory Church	I
11	1129764	Cottages, now Ballroom, at Newtons	II
12	1320690	Newtons	II*
13	1156223	Gate Piers at Newtons	II
14	1320683	Tower Observatory	II
15	1303002	St Pauls Church, Kewstoke	I
16	1283909	K6 Telephone Box	II
17	1129763	Owl's Restaurant/Cafe	II
18	1012722	Woodspring Priory and associated Fishponds and field system	SAM
19	1008115	Bowl Barrow and Disc Barrow 600m NNW of Sandpoint Farm	SAM
20	1008114	Motte and Bailey Castle 650m NNW of Sandpoint Farm	SAM

3.6 WALKOVER SURVEY

A walkover survey of the site was undertaken during the week commencing the 25th of June 2022 by P. Bonvoisin. The weather during that week the weather was fine and generally sunny. The state of cultivation varied across the 9 fields (see Table 6), but it is clear that all these fields have been subject to ploughing, and the earthworks that survive – the relict field boundaries and gripes more clearly visible in the adjoining fields (Figures 9-11) – are very slight. In general, most field boundaries comprise a wet ditch along which hedgerow shrubs have become established. The southern half of the site was mostly bordered by overgrown hedgebanks, particularly along the roads; debris and litter was also observed along the edges of Fields F1 and F2 in particular, providing additional magnetic disturbance. While Fields F4-F6 and F9 had been ploughed in the last agricultural year, archaeological material was only found within a concentrated area in Field F9. Additional photographs can be found in Appendix 2.

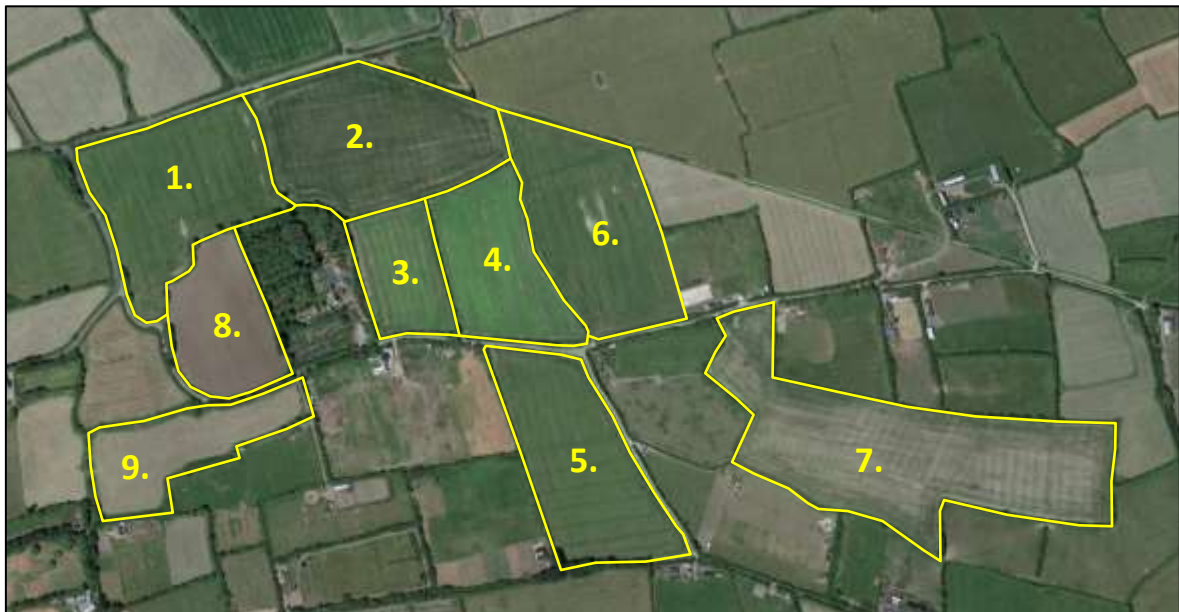


FIGURE 22: THE LAYOUT OF THE SITE (2018 AERIAL PHOTOGRAPH, NORTH IS TO THE RIGHT) (© GOOGLE EARTH 2022).

TABLE 6: STATE OF CULTIVATION.

Field	State of Cultivation	Notes and Comments
1	Grass ley	Debris and overhead cables along western border.
2	Grass ley	Overhead cables running cross southern portion of field.
3	Grass ley	No earthworks or features of note.
4	Last year's stubble	No earthworks or features of note.
5	Winter wheat	No earthworks or features of note.
6	Winter wheat	No earthworks or features of note.
7	Grass ley	Shallow remnants of the previous field system visible whilst surveying.
8	Grass ley	Tree fallen into field partially obscured small portion of field.
9	Spring barley	Roman pottery (x14 sherds, 121g) from the ploughsoil.

Field 1

4.03ha. Field F1 is located to the south-west corner of the site, with fairly regular boundaries to the north, west and south, but a highly irregular boundary to the Field F8 to the east, arising from the amalgamation of several smaller fields here. Several piles of debris were observed along the south and west boundaries, with overhead cables also running along the western boundary



FIGURE 23: FIELD F1. VIEWED FROM THE NNW, LOOKING SSE.



FIGURE 24: FIELD F2. VIEWED FROM THE ENE, LOOKING WSW.

Field 2

4.48ha. Field F2 lies to the west of the site and north of Field F1, basically rectangular in shape bar for the north-west corner where the Kewstoke Rhyne cuts across. Overhead cables continue from Field F1 and run across the field. The northern boundary of Field F2 comprised a ditch with no hedgebank.

Field 3

1.66ha. Field F3 is located to the north of Elmsley Nursery and is rectangular in shape. Hedges border this field to the north, east and west, with the nursery and a partly wooded boundary to the south.



FIGURE 25: FIELD F3. VIEWED FROM THE ENE, LOOKING WSW.

Field 4

2.76ha. Field F4 lies to the centre of the site, between Fields F2, F3 and F6; it is basically rectangular in shape. Collum New Rhyne runs along its northern side. The remnants of an oilseed rape crop to the corners of the field may have contributed to the stagger visible in the survey data.



FIGURE 26: FIELD F4. VIEWED FROM THE SOUTH-EAST, LOOKING NORTH-WEST.

Field 5

3.65ha. Field F5 is located to the west of Elmsley Lane; it is roughly rectangular in shape. Collum New Rhyne runs along its northern side. Field F5 was under a crop of winter wheat at time of survey; the northern corner of the field was wet even during the hot weather.



FIGURE 27: FIELD F5. VIEWED FROM THE ENE, LOOKING WSW.

Field 6

4.0ha. Field F6 is location to the northern side of the main block of fields. It is basically rectangular except for its western side, where the Kewstoke Rhyne cuts across. Collum New Rhyne runs along its southern side. Field F6 was under winter wheat at the time of survey.



FIGURE 28: FIELD F6. VIEWED FROM THE SSE, LOOKING NNW.

Field 7

6.88ha. Field F7 lies to the north-eastern side of the site and is highly irregular in shape, arising from the amalgamation of at least six earlier fields. The Redcroft Rhyne runs along part of its south-eastern boundary. Shallow earthworks relating to the removed field boundaries were observed during the survey.



FIGURE 29: FIELD F7. THE SOUTHERN END, VIEWED FROM THE SOUTH-WEST, LOOKING NORTH-EAST.

Field 8

2.18ha. Field F8 is located on the southern edge of the site and comprises most of the ‘dryland’ area (i.e. slightly elevated relative to the former wetland). This is one of the *Elmshay* fields and it has a long curving boundary to the east and south, making it look like a summerdike. The boundary to the north, which separates it from the nursery, is lined by tall quick-grown conifers.



FIGURE 30: FIELD F8. VIEWED FROM THE SOUTH, LOOKING NORTH.

Field 9

2.28ha. Field F9 lies to the south-east and beyond Elmsley Lane. This field is highly irregular, having been created out of three smaller enclosures. This was the only field that was ploughed and reseeded this spring, and while the spring barley was 60-80mm high, enough bare soil was visible for a certain level of fieldwalking to be attempted. Towards the middle of the field, to its western side, one 30m grid produced a small assemblage of Romano-British pottery (×11 sherds 95g greyware; ×2 sherds 25g LIA-ER jar; ×1 sherd 1g abraded Samian). This indicates, as might be anticipated, the present of a Romano-British settlement close to the interface between the dryland and the former wetland.



FIGURE 31: FIELD F9. VIEWED FROM THE NORTH, LOOKING SOUTH.

3.7 GEOPHYSICAL SURVEY

3.7.1 INTRODUCTION

An area of c.30.5ha was the subject of a magnetometry (gradiometer) survey. The purpose of this survey was to identify and record magnetic anomalies within the proposed site. While identified anomalies may relate to archaeological deposits and structures, the dimensions of recorded anomalies may not correspond directly with any associated features. The following discussion attempts to clarify and characterise the identified anomalies. The survey was undertaken during the week of the 25th of June 2022 by P. Bonvoisin, P. Scrivener, and E. Carey-Say; the survey data was processed by P. Bonvoisin.

3.7.2 METHODOLOGY

The gradiometer survey follows the general guidance as outlined in: *EAC Guidelines for the Use of Geophysics in Archaeology* (EAC 2016) and *Standard and Guidance for Archaeological Geophysical Survey* (CIfA 2014b), and in accordance with a project design (SWARCH 2021).

The survey was carried out using a twin-sensor fluxgate gradiometer (Bartington Grad601). These machines are sensitive to depths of up to 1.50m. The survey parameters were: sample intervals of 0.25m, traverse intervals of 1m, a zigzag traverse pattern, traverse orientation was circumstantial, grid squares of 30×30m. The gradiometer was adjusted ('zeroed') every 0.5-1ha. The survey grid was tied into the Ordnance Survey National Grid. The data was downloaded onto *Grad601 Version 3.16* and processed using *TerraSurveyor Version 3.0.25.0*. The primary data plots and analytical tools used in this analysis were *Shade* and *Metadata*. The details of the data processing are as follows:

Processes: Clip +/- 3SD; DeStripe all traverses, median. DeStagger of particular grids.

TABLE 7: METADATA FROM GRADIOMETER SURVEY.

Field no.	Area surveyed	Maximum reading	Minimum Reading	Standard Deviation	Mean	Median
1	3.6033ha	104.83nT	-100.36nT	3.83nT	0.03nT	0.00nT
2	4.2615ha	104.41nT	-102.71nT	4.58nT	0.02nT	0.00nT
3	1.4797ha	95.94nT	-104.00nT	3.58nT	0.01nT	0.00nT
4	2.4449ha	100.88nT	-123.58nT	4.83nT	0.11nT	0.00nT
5	3.2896ha	98.65nT	-100.30nT	3.32nT	-0.07nT	0.00nT
6	3.7009ha	102.32nT	-103.24nT	5.25nT	0.01nT	0.00nT
7	6.2943ha	102.75nT	-104.26nT	8.99nT	-0.08nT	0.00nT
8	1.9893ha	150.84nT	-198.43nT	7.74nT	-0.11nT	0.00nT
9	1.8546ha	105.08nT	-168.89nT	5.96nT	0.10nT	0.00nT

3.7.3 RESULTS

Table 8, with the accompanying Figures 32 to 41, show the analyses and interpretation of the geophysical survey data. Additional graphic images of the survey data and numbered grid locations can be found in Appendix 1.

TABLE 8: INTERPRETATION OF GRADIOMETER SURVEY DATA.

Field no.	Anomaly Group	Class and Certainty	Form	Archaeological Characterisation	Comments
1	1	Weak positive, probable	Fragmented linear	Ditch	Indicative of a ditch or similar cut feature. This linear appears to line up with the bottom of the slight 'island' present within and to the north of Field F8. May be associated with anomaly group 28, and possibly represents an enclosure. Partial remains of this feature may be obscured by anomaly group 3. Responses of c.+1.55nT to c.+0.53nT.
	2	Weak positive, possible	Fragmented linear	Cut feature	Indicative of a cut feature such as a ditch. No clear interpretation of this particular response, possibly partially obscured by geological response which takes up most of Field F1. Responses of c.+1.98nT to c.+0.34nT
	3	Strong mixed response, probable	Amorphous linear arrangement	Historic field boundary	Indicative of a destroyed/removed field boundary. The mixed response suggests a destroyed bank boundary. This anomaly group corresponds to field boundaries visible on the historic mapping. Responses of c.+5.26nT to c.-5.79nT.
	4	Strong mixed response, probable	Amorphous area	Geological response	Indicative of a background geological responses. Large areas of mixed and distorted responses are present across the field, this response probably represents historically waterlogged or lower ground, and possible paleochannels. Responses of c.+/- 7nT.
2	5	Strong mixed response, probable	Amorphous linear	Field boundary	The mottled mixed response of this anomaly group has a very similar form to the known historic boundaries within the site. Indicative of a removed/destroyed historic boundary or similar feature. Responses of c.+83.26nT to c.-16.92nT.
	6	Strong mixed response, probable	Amorphous area	Geological response	Indicative of a background geological responses. Large areas of mixed and distorted responses are present across the field, this response probably represents historically waterlogged or lower ground, and possible paleochannels. Responses of c.+/- 7nT.
3	7	Strong mixed response, probable	Amorphous area	Geological response	Indicative of a background geological responses. Large areas of mixed and distorted responses are present across the field, this response probably represents historically waterlogged or

Field no.	Anomaly Group	Class and Certainty	Form	Archaeological Characterisation	Comments
					lower ground, and possible paleochannels. Responses of c.+/- 7nT.
4	8	Strong mixed response, probable	Amorphous area	Geological response	Indicative of a background geological responses. Large areas of mixed and distorted responses are present across the field, this response probably represents historically waterlogged or lower ground, and possible paleochannels. Responses of c.+/- 7nT.
5	9	Strong mixed response, probable	Amorphous area	Geological response	Indicative of a background geological responses. Large areas of mixed and distorted responses are present across the field, this response probably represents historically waterlogged or lower ground, and possible paleochannels. Responses of c.+/- 7nT.
	10	Strong mixed response, probable	Amorphous area	Geological response	Indicative of a background geological responses. Large areas of mixed and distorted responses are present across the field, this response probably represents historically waterlogged or lower ground, and possible paleochannels. Responses of c.+/- 7nT.
6	11	Very strong mixed response, probable	Amorphous linear	Historic field boundary	Indicative of a destroyed/removed previous boundary. The mixed response suggests a destroyed bank boundary. This anomaly group corresponds to field boundaries visible on the historic mapping. Responses of c.+/- 100nT.
	12	Strong mixed response, probable	Amorphous area	Geological response	Indicative of a background geological responses. Large areas of mixed and distorted responses are present across the field, this response probably represents historically waterlogged or lower ground, and possible paleochannels. Responses of c.+/- 7nT.
7	13	Moderate positive, probable	Linear	Ditch or similar cut feature	Indicative of a cut feature, may represent part of a previous agricultural system. Likely related to anomaly group 14. Responses of c.+2.88nT to c.+0.92nT.
	14	Strong positive, probable	Linear	Ditch or similar cut feature	Indicative of a ditch or cut feature, may represent part of a previous agricultural system or field boundary. May be associated with anomaly group 13. Has a similar form and response to anomaly group 15, and be part of the same feature or associated. Responses of c.+9.23nT to c.+1.94nT.
	15	Strong positive, probable	Linear	Ditch	Indicative of a ditch or cut feature, may represent part of a previous agricultural system or field boundary. Has a similar form and response to anomaly group 14, and be part of the same feature or associated. Responses of c.+5.24nT to c.+1.63nT.
	16	Strong positive, probable	Linear	Historic field boundary	Indicative of a ditch or cut feature, and has a partially fragmented positive response. This anomaly group likely corresponds to a boundary seen on the historic mapping, likely associated with anomaly group 26, which appears to be associated with or represent the same set of historic field boundaries. Responses of c.+6.10nT to c.+1.29nT.
	17	Weak positive, probable	Linear	Previous field system	Indicative of a ditch or cut feature, likely represents the same set of features as anomaly group 18, but shows a weaker response and more diffuse form. Responses of c.+1.69nT to c.+0.62nT.

Field no.	Anomaly Group	Class and Certainty	Form	Archaeological Characterisation	Comments
	18	Moderate positive, probable	Fragmented Linear	Previous field system	Indicative of a ditch or cut feature representing a previous field system. Has a very similar form as anomaly group 19, and shares the same orientation as anomaly groups 17, 19, 20, and 21. Responses of c.+3.03nT to c.+0.62nT.
	19	Moderate positive, probable	Fragmented Linear	Previous field system	Indicative of a ditch or cut feature representing a previous field system. Has a very similar form as anomaly group 18, and shares the same orientation as anomaly groups 17, 18, 20, and 21. Responses of c.+4.50nT to c.+1.78nT.
	20	Weak negative, probable	Fragmented Linear	Previous field system	Indicative of raised ground, representing a previous field system. Has a very similar form as anomaly group 21, and shares the same orientation as anomaly groups 17, 18, 19, and 21. Responses of c.-0.75nT to c.-1.69nT.
	21	Moderate negative, probable	Fragmented Linear	Previous field system	Indicative of raised ground, representing a previous field system. Has a very similar form as anomaly group 20, and shares the same orientation as anomaly groups 17, 18, 19, and 20. Responses of c.-0.69nT to c.-2.94nT.
	22	Very strong mixed response, probable	Amorphous areas, forming fragmented linear	Possible utility	Has a stronger average response than other mixed response anomalies. The strength of which suggests that this is a more modern feature. This anomaly group does not correspond to any features visible on the historic mapping, indicating a possible utility. Responses of c.+/- 100nT.
	23	Strong mixed response, probable	Amorphous fragmented linear	Historic field boundary	Indicative of a destroyed/removed previous boundary. The mixed response suggests a destroyed bank boundary. This anomaly group corresponds to field boundaries visible on the historic mapping. Responses of c.+40.89nT to c.-24.14nT.
	24	Strong mixed response, probable	Fragmented linear	Historic field boundary	Indicative of a destroyed/removed previous boundary. The mixed response suggests a destroyed bank boundary. This anomaly group corresponds to field boundaries visible on the historic mapping. Responses of c.+45.67nT to c.-43.11nT.
	25	Very strong mixed response, probable	Fragmented linear	Historic field boundary	Indicative of a destroyed/removed previous boundary. The mixed response suggests a destroyed bank boundary. This anomaly group corresponds to field boundaries visible on the historic mapping. Responses of c.+/- 100nT.
	26	Very strong mixed response, probable	Fragmented linear	Historic field boundary	Indicative of a destroyed/removed previous boundary. The mixed response suggests a destroyed bank boundary. This anomaly group corresponds to field boundaries visible on the historic mapping. Responses of c.+/- 100nT.
	27	Strong mixed response, probable	Amorphous area	Geological response	Indicative of a background geological responses. Large areas of mixed and distorted responses are present across the field, this response probably represents historically waterlogged or lower ground, and possible paleochannels. Responses of c.+/- 7nT.
8	28	Strong positive response, probable	Fragmented linear	Ditch or boundary	Indicative of a ditch or cut feature, the comparative strength of this response suggests a more significant earthwork. The curve and orientation of this feature could suggest an association with

Field no.	Anomaly Group	Class and Certainty	Form	Archaeological Characterisation	Comments
					anomaly group 1, as part of an enclosure with anomaly groups 30 and 31 in the centre. Responses of c.+16.34nT to c.+1.61nT.
	29	Strong positive response, probable	Linear	Ditch or cut feature	Indicative of a ditch or similar cut feature, as with anomaly groups 30 and 31, this response lies within the possible enclosure. Responses of c.+20.41nT to c.+4.54nT.
	30	Weak positive response, probable	Bent linear	Possible enclosure	Indicative of a ditch or similar cut feature, the clear corner of this response suggests an enclosure; likely associated with anomaly group 31. The position of this feature, on the highest local point within the landscape could indicate a date prior to the draining, or full reclamation of the surrounding levels. Responses of c.+1.91nT to c.+0.64nT.
	31	Strong positive to moderate negative response, probable	Parallel curvilinears	Possible structure	Indicative of a circular structure, such as a round house. The position and form of this group suggests an associated with anomaly group 30. The position of this feature, on the highest local point within the landscape could indicate a date prior to the draining, or full reclamation of the surrounding levels. Responses of c.+6.51nT to c.-5.43nT.
9	32	Moderate positive, probable	Linears	Field system	This anomaly group represents a series of parallel and perpendicular positive linear anomalies. This group all have a very similar form and response, indicating that they represent a previous agricultural landscape or system. Responses of c.+4.81nT to c.+0.79nT.
	33	Moderate positive, probable	Linear	Ditch or cut feature	Indicative of a ditch or cut feature, likely predates the predominantly north-west to south-east aligned field system evident within field 9. Responses of c.+2.21nT to c.+1.32nT.
	34	Moderate positive, probable	Linear	Ditch or cut feature	Indicative of a ditch or cut feature, likely predates the predominantly north-west to south-east aligned field system evident within Field F9. May be associated with anomaly group 35, as shares a similar orientation. Responses of c.+2.73nT to c.+0.89nT.
	35	Moderate positive, possible	Linear	Ditch or cut feature	Indicative of a ditch or cut feature, likely predates the predominantly north-west to south-east aligned field system evident within Field F9. May be associated with anomaly group 34 as shares a similar orientation. Responses of c.+2.86nT to c.+0.47nT.
	36	Very strong mixed response, probable	Linears	Historic field boundary	Indicative of a destroyed/removed previous boundary. The mixed response suggests a destroyed bank boundary. This anomaly group corresponds to field boundaries visible on the historic mapping. Responses of c.+/- 100nT.
	37	Strong mixed response, probable	Linears	Field system	Indicative of removed/destroyed bank or similar feature, follows the same alignment as anomaly group 36, but doesn't appear on the same historic mapping as anomaly group 36. Responses of c.+21.20nT to c.-14.02nT.
	38	Strong mixed response, probable	Amorphous area	Geological response	Indicative of a background geological responses. Large areas of mixed and distorted responses are present across the field, this response probably represents historically waterlogged or

Field no.	Anomaly Group	Class and Certainty	Form	Archaeological Characterisation	Comments
					lower ground, and possible paleochannels. Responses of c. +/- 7nT.
-	-	Moderate-strong dipolar, probable	Point/oval	Ferrous objects/debris	A mostly amorphous spread across the whole survey area, a higher number are visible in Field F8 where there is less of a background geological response. The strongest examples are indicative of ferrous objects that are typically presumed to be modern, such as farm machinery fragments. Similar and weaker responses can be indicative of geological features/anomalies. In the case of this site, most of these are presumably associated with ferrous fragments resulting from modern agricultural activity, perhaps the use of contaminated green waste. These are highly probable to be non-archaeological in nature. Responses of between approximately +/- 5nT and +/-80nT.
-	-	Magnetic disturbance, probable	Spreads associated with site boundaries and disturbed or made-ground	Magnetic disturbance	Magnetic disturbance is present across the site, and mostly corresponds to responses from fence lines and modern services and structures. Areas of highly disturbed ground or hard core near field access also shows a response. Responses of <+/-100nT.

3.7.4 DISCUSSION

The survey identified 38 groups of anomalies. These were predominantly positive linear and mixed linear features, corresponding with lost field boundaries, with partial evidence for an enclosure with central circular feature, ridge and furrow cultivation strips or gripes, and modern disturbance or utilities. Responses are distorted over much of the lower ground due to background geological response.

Anomaly groups 4, 6, 7, 8, 9, 10, 12, 27, and 38 represent a background geological response that covers the majority of the survey area, with only Field F8 being completely free of this distortion. The geological response is demonstrating the density of paleochannels and historically waterlogged environments of the levels, With Field F8 being clear of this because it sits higher within the landscape, forming a low hill.

Anomaly groups 3, 11, 23, 24, 25, 26, 35, and 36 represent historic field boundaries that have been lost since 1840; these anomaly groups relate directly to field boundaries visible on the historic mapping of the area. Anomaly groups 5 and 37 have a similar form, characterised by a linear arrangement of positive and negative responses as opposed to a more uniform shape and response. This form is indicative of the remains of a destroyed boundary/feature or a line of debris. In some cases, these responses may be demonstrating a higher density of stone where the boundary was, or an infilled ditch. Anomaly groups 24, 25 and 37 have the clearest response out of these features. Anomaly groups 13, 14, and 15 possibly represent the same system of features; with anomaly groups 14 and 15, sharing a similar form and response. The orientation and form of these anomaly groups indicate an earlier date than field systems that can still be seen in the eastern extent of field 7.

Anomaly groups 17 to 22 are a set of parallel linear features that run north-east to south-west. This follows a similar orientation as anomaly group 23 and much of anomaly group 24, suggesting a possible relationship. These anomaly groups are indicative of the more ephemeral internal features of an agricultural landscape that elsewhere has been obscured by the background geological response across the site. The LiDAR data for this site, shows a similar arrangement of densely

packed linear features across much of the site, but that only remains evident on the geophysical survey with anomaly groups 17 to 22 in field 7 and anomaly group 32 within Field F9.

Anomaly groups 1 and 28 both traverse the bottom of the slope of the small hill that is partially present within Field F8. Whilst they have differing forms and responses, they do suggest a boundary or enclosure encircling the base of the hill.

Anomaly groups 30 and 31 show part of an apparent rectilinear enclosure with an internal structure (a possible roundhouse), set at the top of the hill towards the south of the site. Anomaly group 31 has a diameter of c.15m and this feature may represent an Iron Age roundhouse. The position of this structure on top of the shallow hill would have provided a commanding view of the surrounding levels. This would have been a logical place for settlement within the local area, but its separation from the 'mainland' might suggest it was more than just a domestic settlement.

Anomaly groups 33, 34 and 35 correspond to linear features on a different alignment to the 19th historic fieldsystems present within Field F9. Whilst these features are not of direct significance, they are positioned less than 30m south of the area where Roman pottery was found within Field F9.

Magnetic disturbance and di-polar anomalies also appear across the site, with the areas of magnetic disturbance attributed to modern debris or the metallic gate and fencing around the site boundary. Di-polar anomalies also appear across the site in high numbers, a slight concentration appears along the boundaries next to the roads, particularly towards the western extent of Field F1, likely corresponding to metallic waste. Amorphous spreads of di-polar anomalies are usual in agricultural sites though this frequency is higher than usual.



FIGURE 32: FIELD F1. INTERPRETATION OF GRADIOMETER SURVEY DATA.

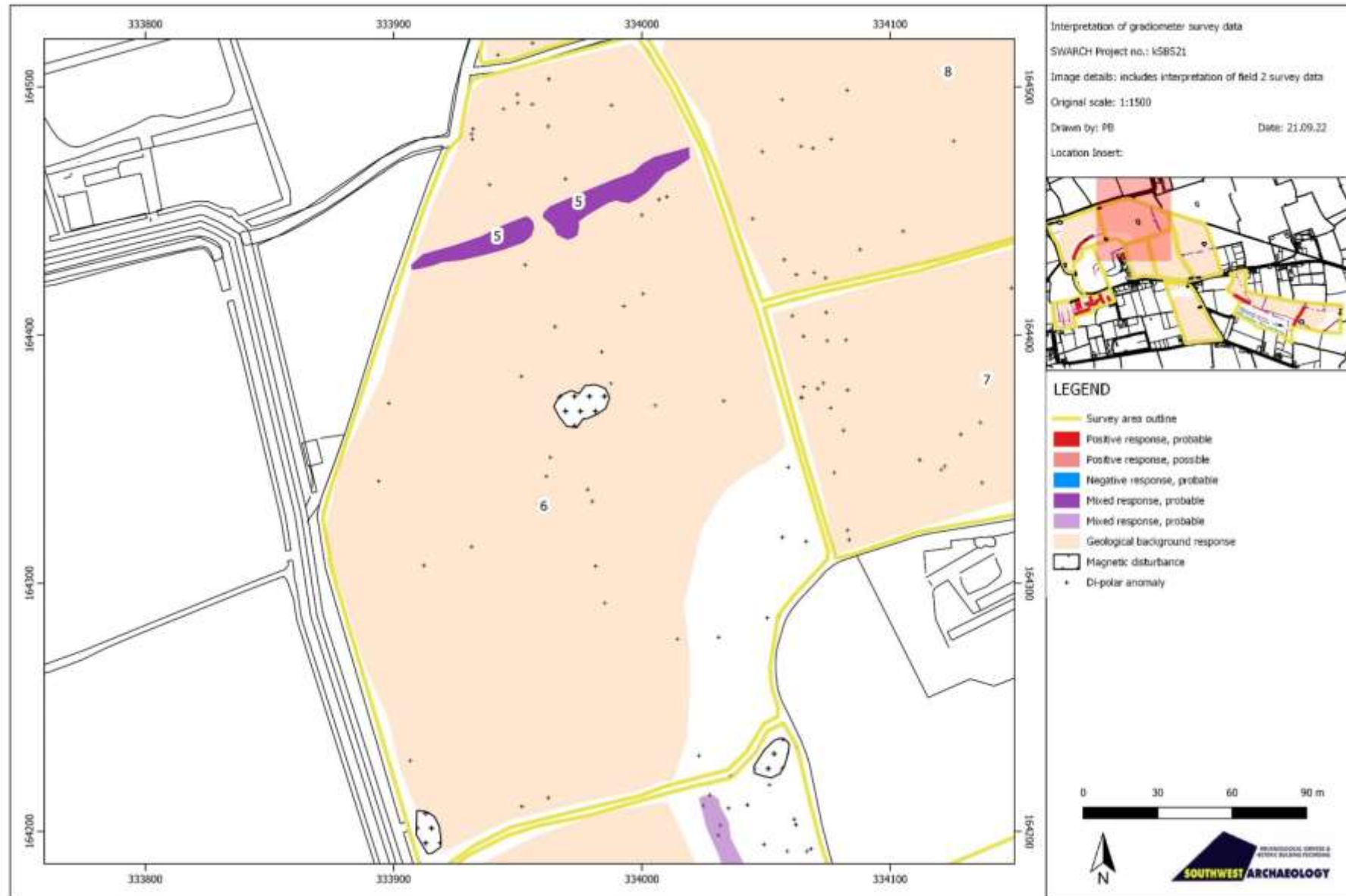


FIGURE 33: FIELD F2. INTERPRETATION OF GRADIOMETER SURVEY DATA.

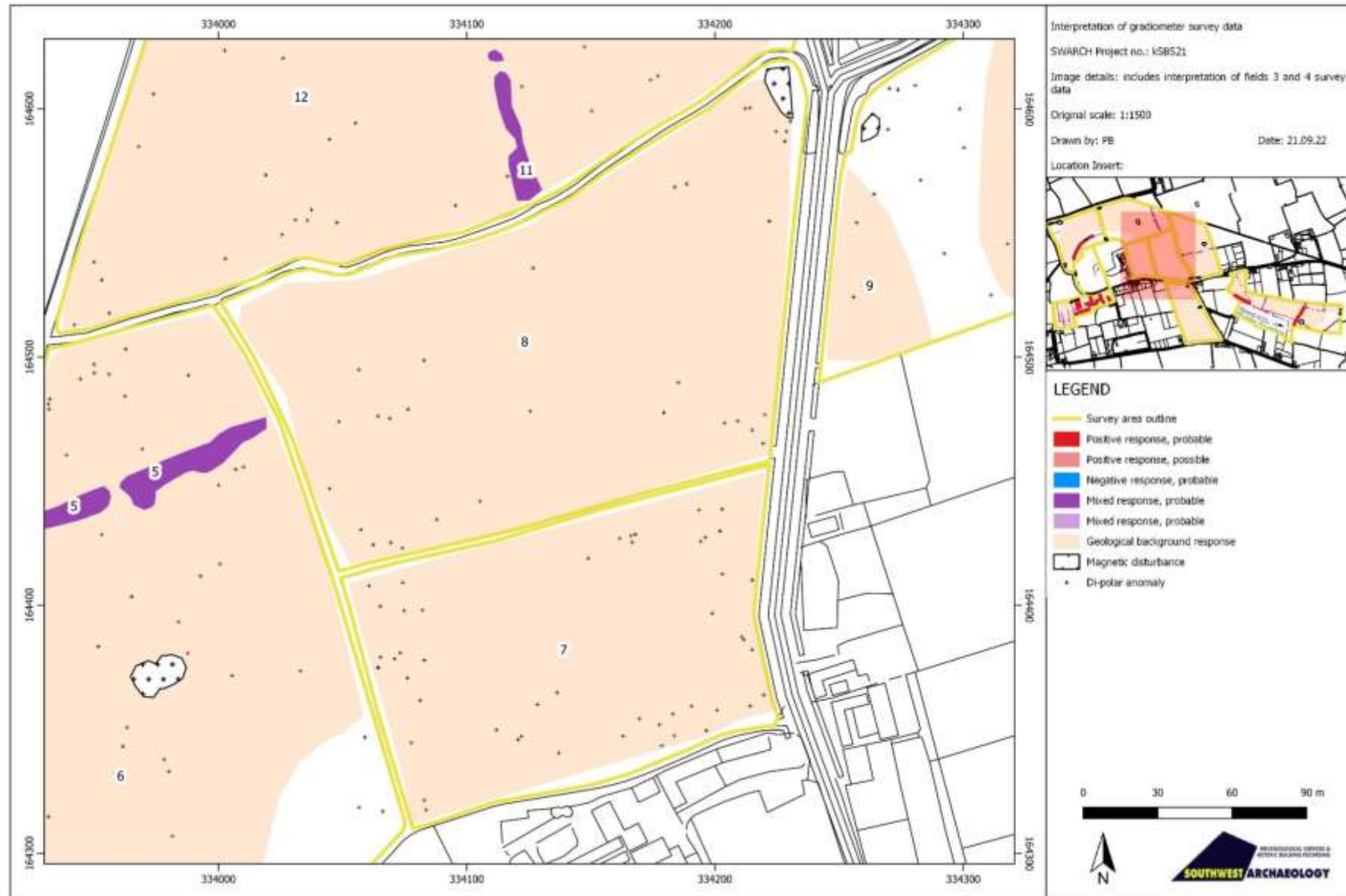


FIGURE 34: FIELDS F3 AND F4. INTERPRETATION OF GRADIOMETER SURVEY DATA.

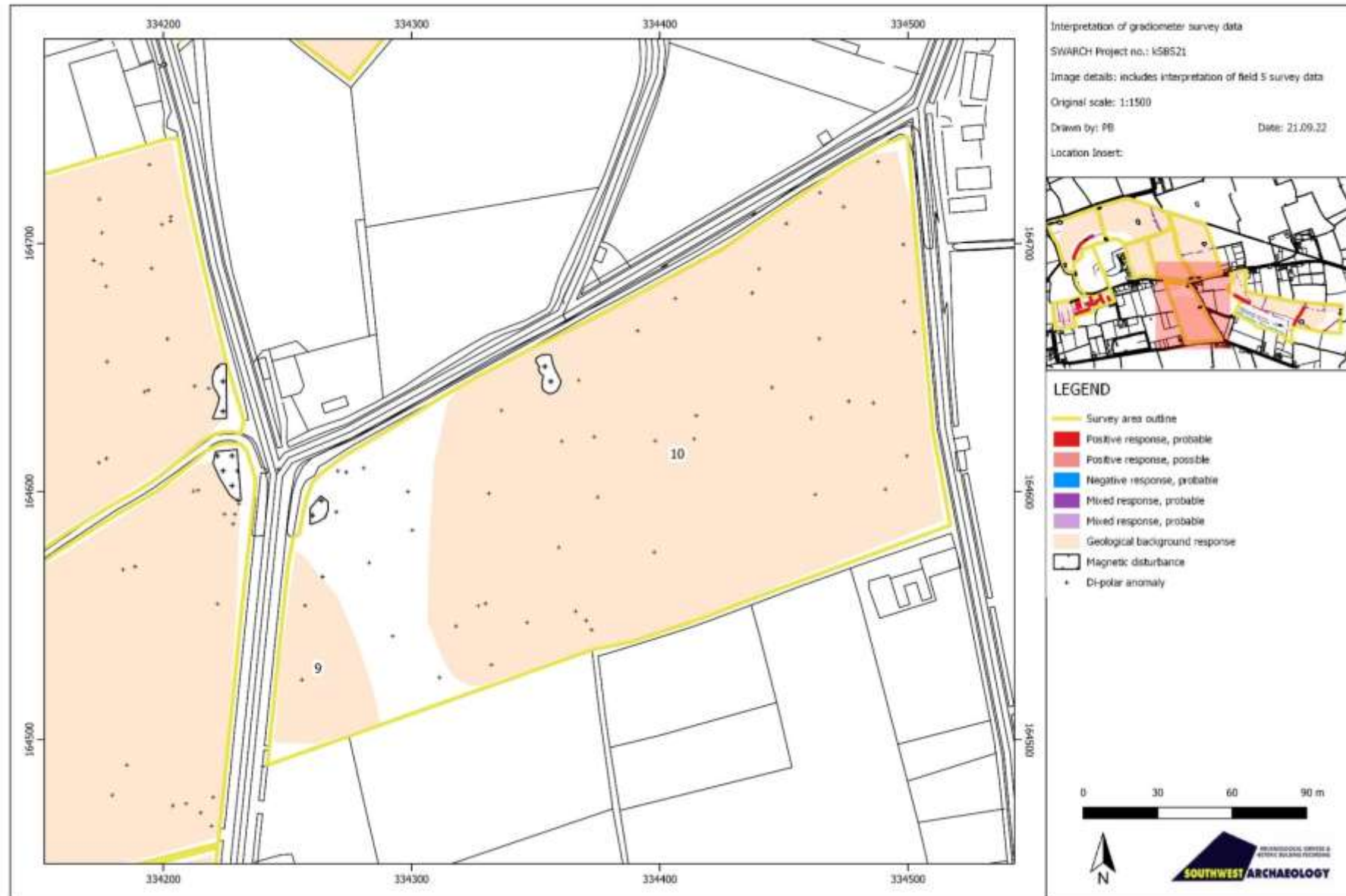


FIGURE 35: FIELD F5. INTERPRETATION OF GRADIOMETER SURVEY DATA.

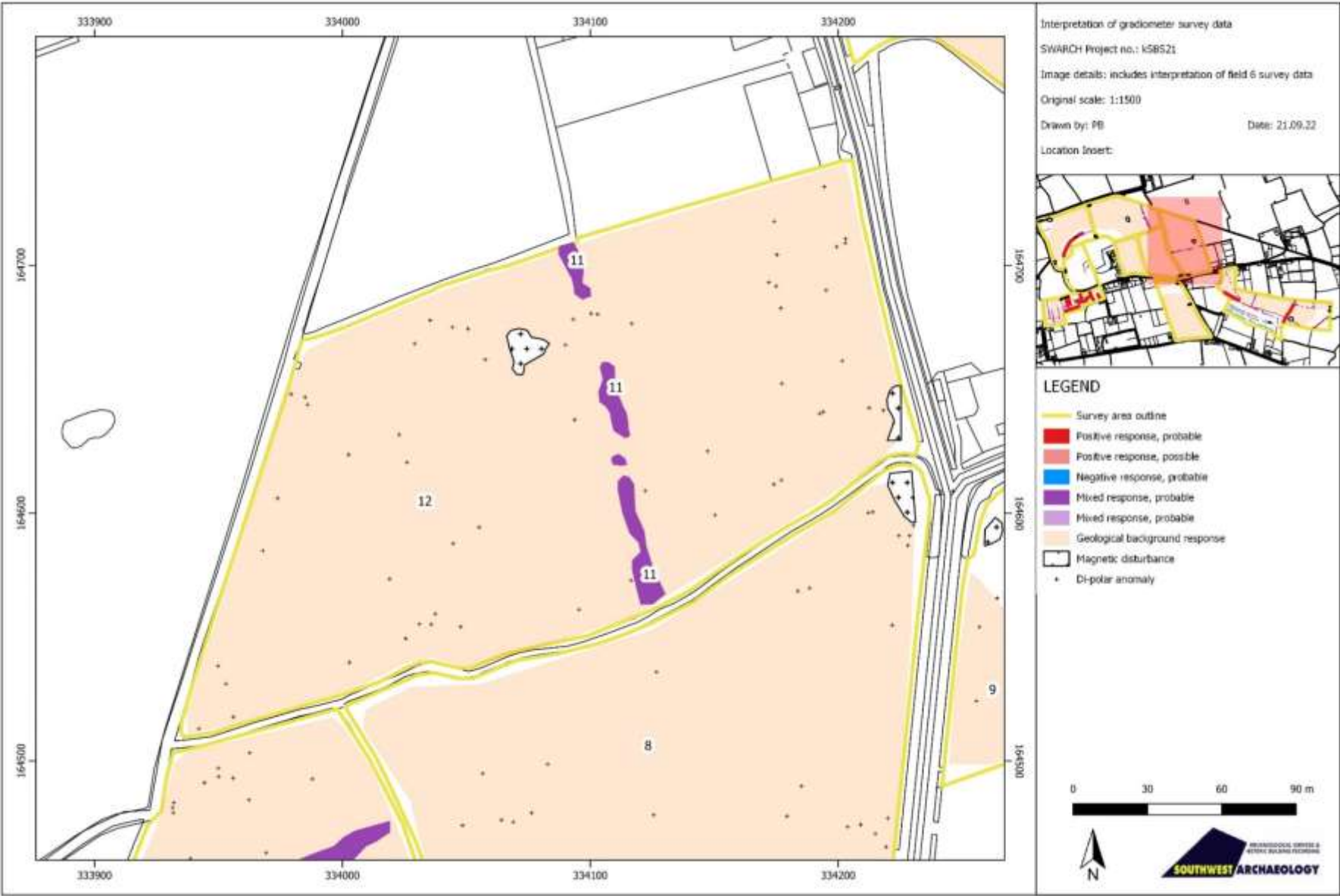


FIGURE 36: FIELD F6. INTERPRETATION OF GRADIOMETER SURVEY DATA.

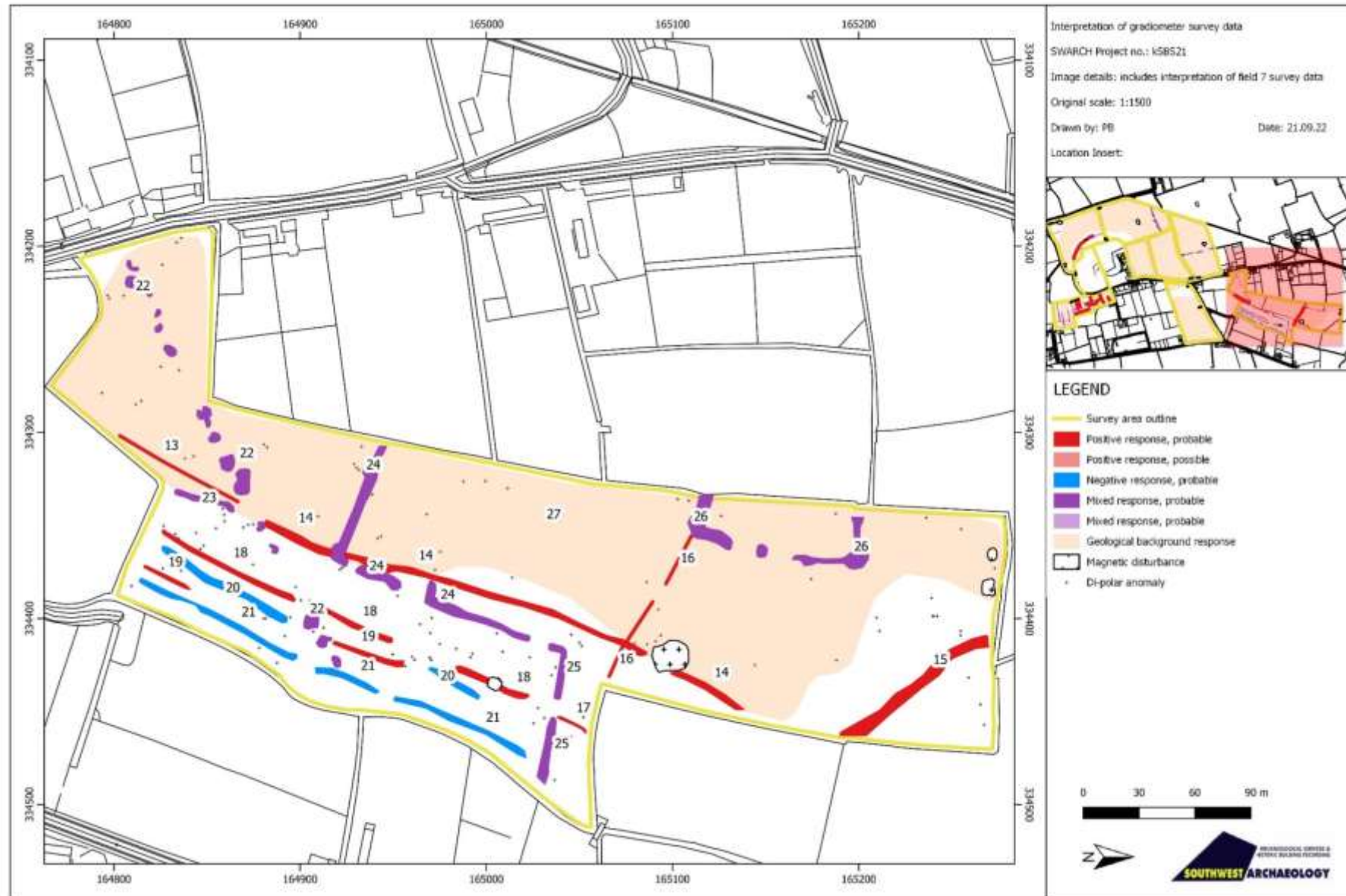


FIGURE 37: FIELD F7. INTERPRETATION OF GRADIOMETER SURVEY DATA.

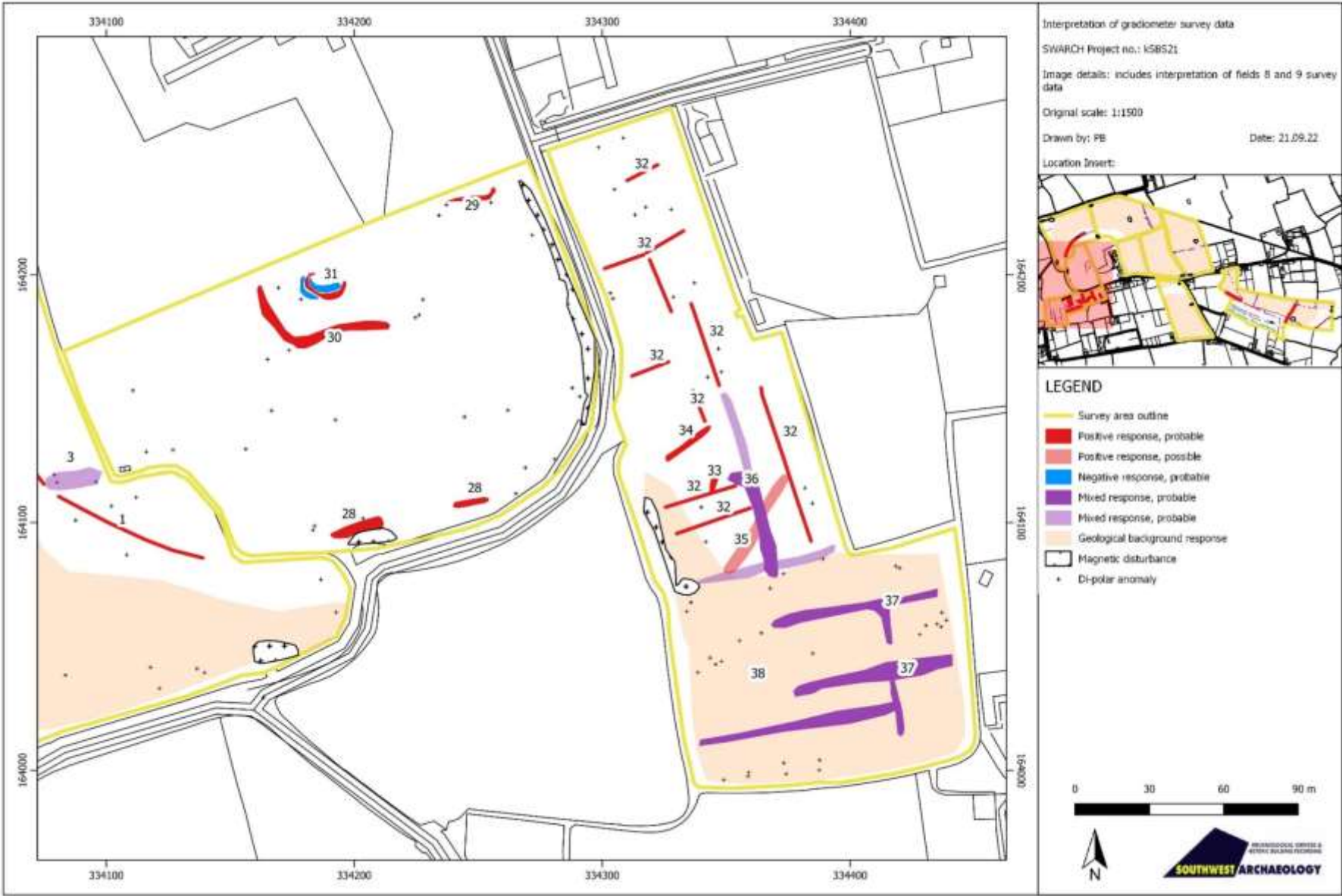


FIGURE 38: FIELDS F8 AND F9. INTERPRETATION OF GRADIOMETER SURVEY DATA.

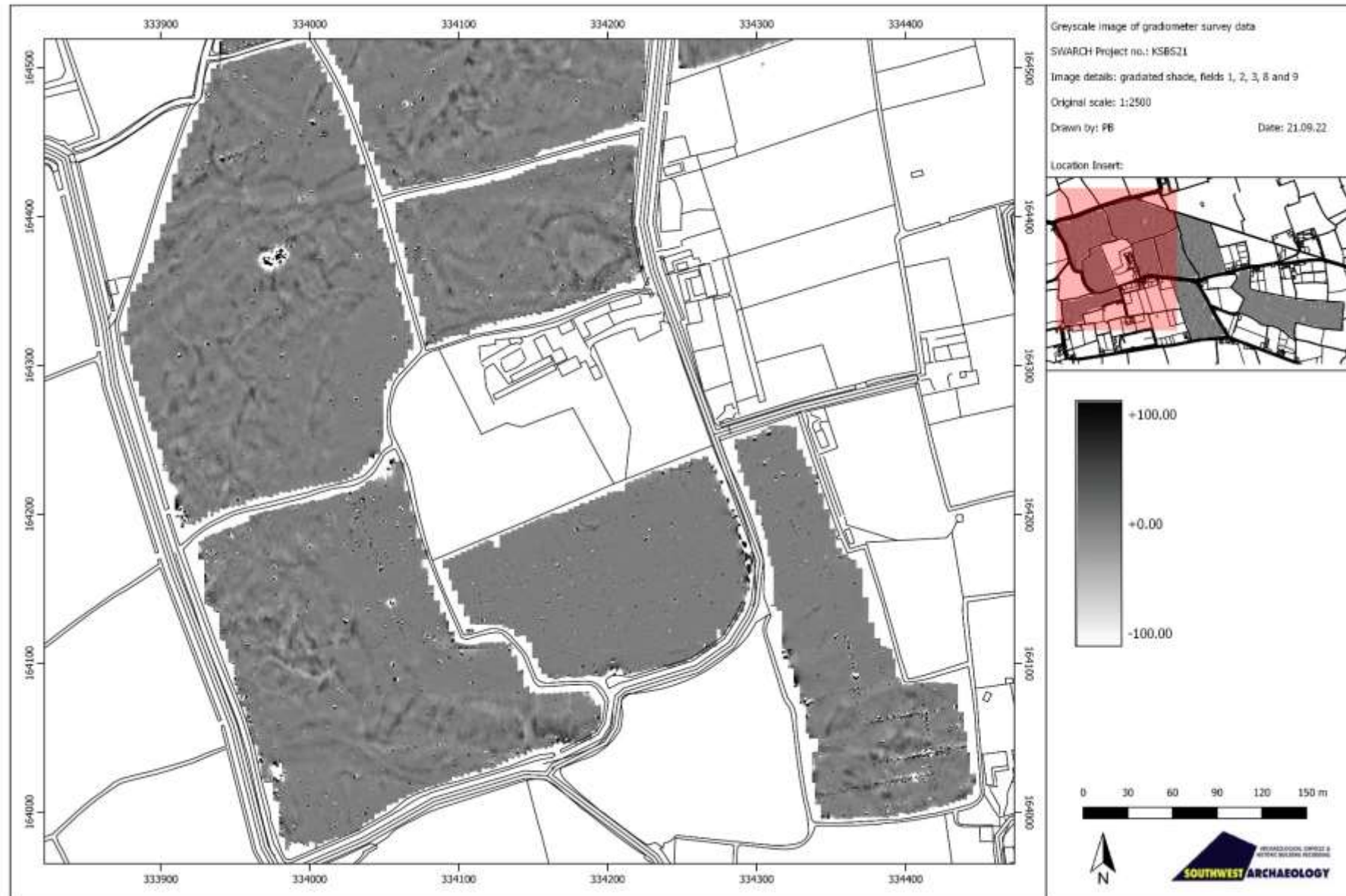


FIGURE 39: FIELDS F1, F2, F3, F8 AND F9. GRADIOMETER SURVEY DATA, GRADIATED SHADING.

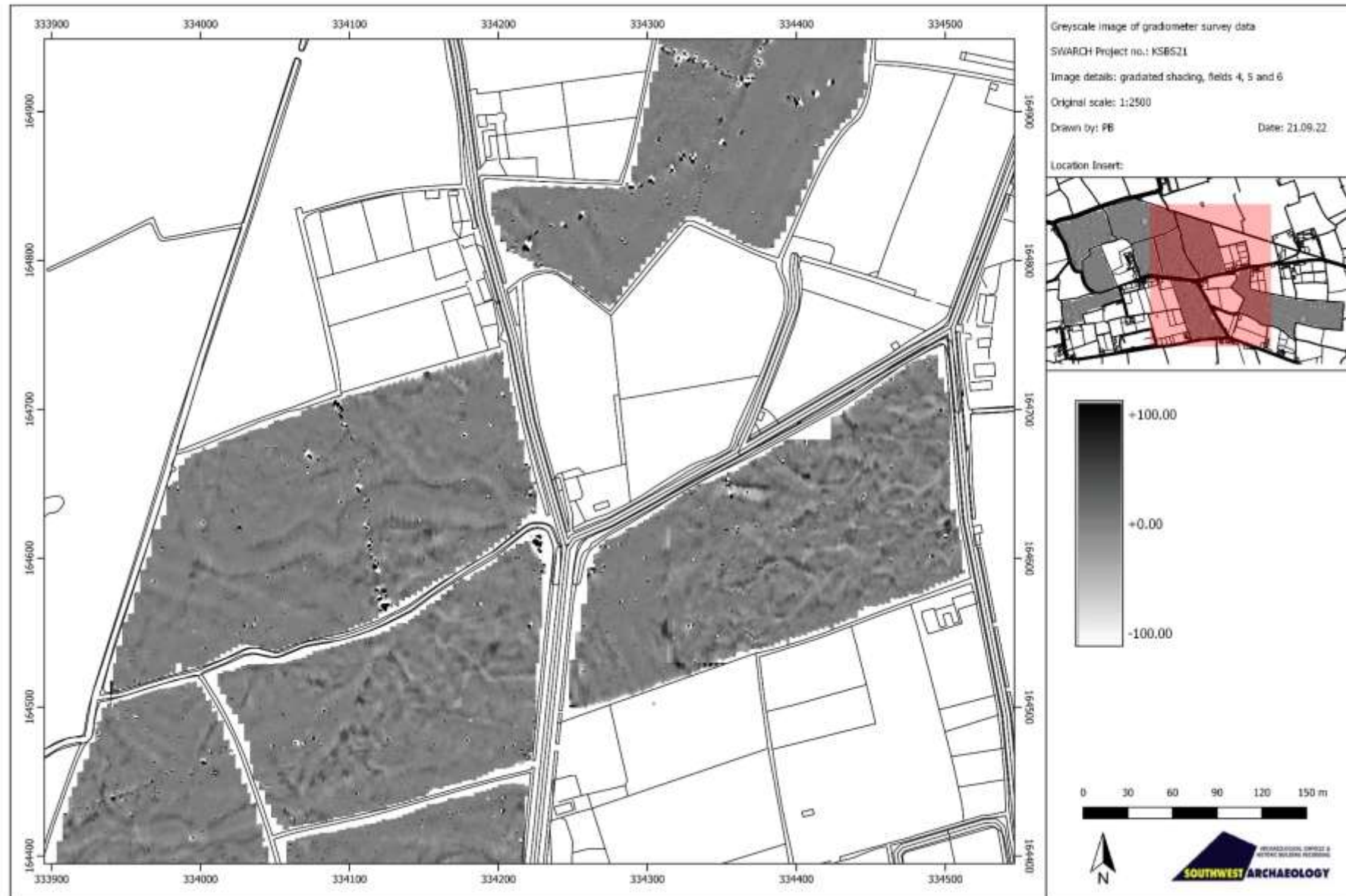


FIGURE 40: FIELDS F4, F5 AND F6. GRADIOMETER SURVEY DATA, GRADIATED SHADING.



FIGURE 41: FIELD F7. GRADIOMETER SURVEY DATA, GRADIATED SHADING.

3.8 ARCHAEOLOGICAL POTENTIAL AND IMPACT SUMMARY

The direct *effect* of the development would be the possible disturbance or destruction of archaeological features or deposits present within the footprint of the development; the *impact* of the development would depend on the presence and significance of archaeological features and deposits.

Based on the results of the desk-based assessment and geophysical survey, the archaeological potential of the site would appear to vary across the site. For the bulk of the site the geophysical survey only returned geological responses relating to the former wetland. Similarly, the LiDAR evidence for earthworks relates almost entirely to the network of current and former drainage ditches and gripes. In these areas, the archaeological potential of the site will be *low*, and impact of the proposed development muted.

For that part of the site which is slightly elevated (mainly Field F8 *Elmshay* but also adjoining parts of Fields F1 and F9), comparison with similar fen edge locations around the North Somerset Levels would suggest these will have a *high* potential for Late Prehistoric and Romano-British occupation. While the geophysical survey is hardly conclusive, the presence of Roman pottery in Field F9 indicates such occupation is present. What makes this site slightly different to recently excavated examples (i.e. those at Oldmixon Road, Meadfields, and Banwell, see: see: ACA 2018; Axbridge Caving Group 1967; Border Archaeology 2017; Foreman 2020; SWARCH *forthcoming a* and *forthcoming b*) is that *Elmshay* would have been an island, and that extra degree of physical separation might be reflected in the kind of activity that took place here. The restricted size of the dryland ‘island’ is also likely to have an impact on the thickness of peripheral colluvial layers. Undisturbed archaeological features are likely to be present at a depth of c.400mm below the current surface, and there is a fair probability that they will be complex and multi-period. They will be vulnerable to disturbance and thus an engineering solution is to be encouraged here.

There are no nearby boreholes to explore the depth and character of the superficial geology here, though a survey of the beach defences in 1982 determined there were peat deposits there at c.0.64m AOD, and an evaluation at Pontin’s Holiday Park identified the same peat deposits (Williams 2001). We may assume peat is present across this part of the North Somerset Level at 3-4m below current ground levels, and thus unlikely to be affected by the works.

TABLE 9: SUMMARY OF DIRECT IMPACTS.

Asset	Type	Distance	Value	Magnitude of Impact	Assessment	Overall Assessment
Direct Impacts						
Probable Romano-British interface settlement	N/D	Onsite	Medium (regional)	Minor to Moderate	Slight to Moderate	Minor Adverse to Moderate Adverse
Palaeoenvironmental deposits	N/D	Onsite	Medium (regional)	Negligible	Neutral/Slight	Negligible Adverse
<i>After mitigation</i>				Minor	Neutral/Slight	Neutral/Negligible

4.0 INDIRECT IMPACTS

4.1 STRUCTURE OF THE ASSESSMENT

For the purposes of this assessment, the *indirect effect* of a development is taken to be its effect on the wider historic environment. The principal focus of such an assessment falls upon identified designated heritage assets like Listed buildings or Scheduled Monuments. Depending on the nature of the heritage asset concerned, and the size, character and design of a development, its effect – and principally its visual effect – can impact on designated assets up to 20km away.

The methodology adopted in this document is based on that outlined in *The Setting of Heritage Assets* (GPA3 Historic England 2017), with reference to ICOMOS (2011) and National Highways (DMRB, WEBTAG) guidance. The assessment of effect at this stage of a development is an essentially subjective one, but one based on the experience and professional judgement of the authors. Appendix 4 details the methodology employed.

This report follows the staged approach to proportionate decision making outlined in *The Setting of Heritage Assets* (Historic England 2017, 6). *Step one* is to identify the designated heritage assets that might be affected by the development. The first stage of that process is to determine an appropriate search radius, and this would vary according to the height, size and/or prominence of the proposed development. For instance, the search radius for a wind turbine, as determined by its height and dynamic character, would be much larger than for a single house plot or small agricultural building. The second stage in the process is to look at the heritage assets within the search radius and assign to one of three categories:

- Category #1 assets: Where proximity to the proposed development, the significance of the heritage asset concerned, or the likely magnitude of impact, demands detailed consideration.
- Category #2 assets: Assets where location and current setting would indicate that the impact of the proposed development is likely to be limited, but some uncertainty remains
- Category #3 assets: Assets where location, current setting, significance would strongly indicate the impact would be no higher than negligible and detailed consideration both unnecessary and disproportionate. These assets are still listed in the impact summary table.

For *Step two* and *Step three*, and with an emphasis on practicality and proportionality (*Setting of Heritage Assets* p15 and p18), this assessment then groups and initially discusses heritage assets by category (e.g. churches, historic settlements, funerary remains etc.) to avoid repetitious narrative; each site is then discussed individually, and the particulars of each site teased out. The initial discussion establishes the baseline sensitivity of a given category of monument or building to the potential effect, the individual entry elaborates on local circumstance and site-specific factors. The individual assessments should be read in conjunction with the overall discussion, as the impact assessment is a reflection of both.

Additional photographs can be found in Appendix 3.

4.2 QUANTIFICATION

There are 37 designated heritage assets within 2.5km of the site: 31 Listed Buildings or structures, four Scheduled Monuments, and six Scheduled Monument; two of the Scheduled Monuments are also Listed. Based on a consideration of the topography and the nature of the assets themselves, 22 of the designated heritage assets were scoped out of the assessment following the fieldwork and are only represented in the Table 10 (below).

The assets selected for assessment were: Rose Tree Farmhouse (GII); Norton Court Farmhouse (GII); Holme Farmhouse (GII); the Church of St Paul at Kewstoke (GI); Owl's Cottage café (GII); Woodspring Priory (GI×6, GII*, SAM); a bowl and disc barrow at Sandpoint (SAM); and a motte and bailey at Sandpoint (SAM). Based on their perceived value and locations relative to the site, these have all been treated as *Category #2 assets*.

4.3 IMPACT BY CLASS OF MONUMENT OR STRUCTURE

4.3.1 FARMHOUSE AND FARM BUILDINGS

Listed farmhouses with Listed agricultural buildings and/or Curtilage; some may have elements of formal planning/model farm layout

These have been designated for the completeness of the wider group of buildings or the age or survival of historical or architectural features. The significance of all of these buildings lies within the farmyard itself, the former historic function of the buildings and how they relate to each other. For example, the spatial and functional relationships between the stables that housed the cart horses, the linyay in which the carts were stored, the lofts used for hay, the threshing barn to which the horses brought the harvest, or to the roundhouse that would have enclosed a horse engine and powered the threshing machine. Many of these buildings were also used for other mechanical agricultural processes, the structural elements of which are now lost or rare, such as apple pressing for cider or hand threshing, and may hold separate significance for this reason. The farmhouse is often listed for its architectural features, usually displaying a historic vernacular style of value; they may also retain associated buildings linked to the farmyard, such as a dairy or bake house, and their value is taken as being part of the wider group as well as the separate structures.

The setting of the farmhouse is in relation to its buildings or its internal or structural features; farmhouses were rarely built for their views, but were practical places of work, developed when the farm was profitable and neglected when times were hard. In some instances, model farms were designed to be viewed and experienced, and the assessment would reflect this. Historic farm buildings are usually surrounded by modern industrial farm buildings, and if not, have been converted to residential use, affecting the original setting.

What is important and why

Farmhouses and buildings are expressions of the local vernacular (evidential) and working farms retain functional interrelationships (historical/associational). Farms are an important part of the rural landscape and may exhibit levels of formal planning with some designed elements (aesthetic/designed but more often aesthetic/fortuitous). Working farms are rarely aesthetically attractive places, and often resemble little more than small industrial estates. The trend towards the conversion of historic farm buildings and the creation of larger farm units severely impacts on historical/associational value.

Asset Name: Rose Tree Farmhouse	
Parish: Kewstoke	Views to/from site verified: YES (none/limited)
Designation: Grade II	Value: Medium
Distance to the site: 0.2km	Condition: Good
<i>Description: Listing:</i> Farmhouse, now 2 houses. C17, C19 and C20 alterations. Rendered rubble, double Roman tiles, brick stacks. 2 storeys, 4 windows; C19 and C20 casements, 2 first floor windows at west in partial eaves dormers. West door in recessed porch. Interior has deep chamfered, step stopped beams and fireplace with moulded and stopped depressed arch lintel and chamfered jambs.	
<i>Supplemental Comments:</i> Both cottages look like the windows have been replaced and it is likely the interiors have also renovated as well; there is a new door for the west cottage. The partial eaves dormers are no longer present.	
<i>Conservation Value:</i> The building is well-proportioned but rather plain and visually uninteresting, its probable age belied by the freshly-painted render and modern casement windows, so limited aesthetic value. The hedge around no.1 makes it more difficult to appreciate the building. It will have evidential value as the Listing is not very detailed –	

this could be a medieval building with inserted floors and stack. It has historic/illustrative value as an example of a vernacular building and now subdivided farmhouse. No communal value.
<i>Authenticity and Integrity:</i> The building is in good repair. Its authenticity as a <i>farmhouse</i> is not impaired by conversion to cottages, as this is a common event in the use-life of the larger rural houses.
<i>Topographical Location & Landscape Context:</i> The building is located on level ground at the base of a slope that rises gently to the east, south and west. It is open to the level to the north.
<i>Setting:</i> The former farmhouse stands next to the parish lane, with small walled and hedged gardens to the front, and slightly larger walled or fenced gardens to the rear. The field to the east and north of the house has recently been converted to a holiday park for upmarket cabins. To the west are a pair of later 20 th century homes and their plain walled and hedged gardens. Beyond the lane to the south is an open grass field. The garden of the adjacent property runs back to the north and both hedgerows feature mature deciduous trees.
<i>Principal Views:</i> Views to and from the building are limited by the screening provided by adjacent buildings and trees. There is nothing that could be described as a principal value – the structure is only visible from the roadside and its garden.
<i>Landscape Presence:</i> It is not visible on a landscape scale.
<i>Sensitivity of Asset:</i> The value of this building is largely evidential and historical/illustrative, neither of which would be affected by the proposed development.
<i>Contribution of Setting to Significance of Asset:</i> Incidental. While the current setting does not actively detract from the appearance of the building, it hardly sets it off to best advantage. The house is hemmed in by the redevelopment of the adjacent holiday part and its pronounced new entrance.
<i>Magnitude of Effect:</i> The proposed development would be located some distance from the property, and at least partly screened by intervening structures and trees. The building is a recessive visual feature and is largely screened from view save for the roadside. The development would not affect the ability to appreciate the significance of the building. The development would introduce a significant non-agricultural visual element to the area.
<i>Magnitude of Impact:</i> Negligible change + Medium value asset = Neutral/Slight effect
<i>Overall Impact Assessment:</i> Negligible Adverse



FIGURE 42: ROSE TREE FARMHOUSE; VIEWED FROM THE ESE, LOOKING WNW.

Asset Name: Norton Court Farmhouse	
<i>Parish:</i> Kewstoke	<i>Views to/from site verified:</i> YES (none/limited)
<i>Designation:</i> Grade II	<i>Value:</i> Medium
<i>Distance to the site:</i> 0.2km	<i>Condition:</i> Good
<i>Description: Listing:</i> Farmhouse. C17. Rubble, pantiles and double Roman tiles. Cross passage with (slightly) lower service end, extended. 2 storeys, 6 windows; all 3-light C19 and C20 casements except french windows, ground floor, each end. Central recessed door with plain rendered surround. Single storey dairy wing to west. At rear, single storey extensions do not conceal gabled stair turret with 2-light ovolo moulded mullion window. Interior has blocked fireplace with stopped chamfered lintel and shelf; deep chamfered beams with scroll stops and winder stair in turret with solid oak treads and small 2-light window.	

<i>Supplemental Comments:</i> As with Rose Cottage, the building looks to have been refenestrated recently. The phasing in the front (south) wall would indicate a complex, four-block development, so likely to originate as a cottage or smaller hall block rather than a three-cell cross-passage farmhouse. Probably subdivided into several cottages.
<i>Conservation Value:</i> The building is well-proportioned, partly concealed by trees but interestingly asymmetrical. Phasing is evident in the exposed stone rubble walls, so some aesthetic value. The trees/fencing around the south front make it more difficult to appreciate the building. It will have evidential value as the Listing is not very detailed – this could be a medieval building with inserted floors and stack – its development includes are least three phases of extension. It has historic/illustrative vale as an example of a vernacular building. No communal value.
<i>Authenticity and Integrity:</i> The building is in good repair. Its authenticity has a <i>farmhouse</i> is not particularly impaired by conversion to wholly residential use.
<i>Topographical Location & Landscape Context:</i> The building is located on sloping ground towards the base of a slope that rises gently to the south and west. It is open to the Level to the north.
<i>Setting:</i> The former farmhouse stands next to the parish lane, with small walled and hedged gardens to the front, with a large but plain garden/lawn with car parking to the rear. This is open to a small field that runs back to the north and which is bounded by tall hedges. Immediately to the east is a Manor Farm Cattery, a low later 20 th century bungalow with a modern mono-pitch shed to the roadside, partly concealed behind a tall wooden fence. To the west is a track and thin strip of grass field, beyond which is the garden of another bungalow. Beyond the lane to the south is an open grass field.
<i>Principal Views:</i> Views to and from the building are limited by the screening provided by adjacent buildings and trees. There is nothing that could be described as a principal value – the structure is only visible from the roadside and its garden.
<i>Landscape Presence:</i> It is not visible on a landscape scale.
<i>Sensitivity of Asset:</i> The value of this building is largely evidential and historical/illustrative, neither of which would be affected by the proposed development. It has some aesthetic value, but this is only really to be appreciated within its immediate setting.
<i>Contribution of Setting to Significance of Asset:</i> Incidental. While the current setting does not actively detract from the appearance of the building, it could be more sympathetic. The proximity of the Cattery, its fencing and signage, is a negative visual feature.
<i>Magnitude of Effect:</i> The proposed development would be located some distance from the property, and at least partly screened by intervening structures and trees. The building is a fairly recessive visual feature and is largely screened from most views save that of the roadside. The development would not affect the ability to appreciate the significance of the building. The development would introduce a significant non-agricultural visual element to the area.
<i>Magnitude of Impact:</i> Negligible change + Medium value asset = Neutral/Slight effect
<i>Overall Impact Assessment:</i> Negligible Adverse



FIGURE 43: NORTON COURT FARMHOUSE; VIEWED FROM THE SSE, LOOKING NNW.

Asset Name: Holme Farmhouse	
<i>Parish:</i> Kewstoke	<i>Views to/from site verified:</i> NO
<i>Designation:</i> Grade II	<i>Value:</i> Medium

<i>Distance to the site:</i> 0.3km	<i>Condition:</i> Good
<i>Description: Listing:</i> Farmhouse. C17. Roughcast render, pantiles, double Roman tiles. L-plan, extended. 2 storeys, 4 windows, C20 casements; ground floor openings have hoodmoulds and moulded lintels. Off-centre left is plank door in stopped ovolo moulded frame behind C20 lean-to glazed porch. Return elevation at east in end gable and formerly gabled wing has 2 storey, 2 windows all with hood moulds and moulded lintel. One window is 3-light C19 replacement; others are 2- or 3- light ovolo moulded mullion leaded casements with stays intact. Interior has stopped chamfered beams, inglenook fireplaces; plaster overmantel in east bedroom, dated 1660.	
<i>Supplemental Comments:</i> The farmhouse lies at the end of a private lane and was not accessed. Online photographs indicate the lean-to porch has been replaced with a small porch with a tiled pitched roof. The parkland area to the south of the farmhouse is used as a small caravan park.	
<i>Conservation Value:</i> The building is probably older than 1660 and appears from aerial photographs to be attractively arranged in front of a semi-formalised court with turning circle and scattered parkland trees. It will have evidential value as the Listing is not very detailed – this could easily be medieval in origin with inserted floors and stack. It has historic/illustrative value as an example of a vernacular building. No communal value.	
<i>Authenticity and Integrity:</i> The building appears in good repair. Its authenticity has a <i>farmhouse</i> may be impaired if, as the aerial photographs would suggest, it is now separate to the modern farmyard to the rear.	
<i>Topographical Location & Landscape Context:</i> The building is located on level ground on something of a platform towards the base of a slope that rises gently to the south-east. It is open to the Level to the north and west.	
<i>Setting:</i> The house stands to the north side of an enclosure covering c.0.6ha, bounded by tall hedges and containing scattered parkland trees. The access track enters from the north-east and ends in a wide turning circle in front of the house; two further tracks run down to serve the southern part of the enclosure. The interior is of mown grass, and a greater part of the field is used as a caravan park. Just to the south-west of the house is a low modern utility building serving the park. The ‘garden’ in front of the house is contained within a low stone wall. To the east of the house is a second dwelling which faces north. North-east of the house is a modern farmstead of steel portal-framed buildings; this is well screened by trees. North-west of the house is a small area of private garden, beyond which lie open fields.	
<i>Principal Views:</i> Views to and from the building are limited by the screening provided by adjacent buildings and trees. There are good views to the principal façade (south-facing) from the tree-scattered gardens in front. The rear is screened by trees. Views from the rear wings of the property over the Level would be possible, but these would have been servant’s rooms and not intended to be significant.	
<i>Landscape Presence:</i> It is not visible on a landscape scale.	
<i>Sensitivity of Asset:</i> The value of this building is largely evidential and historical/illustrative, neither of which would be affected by the proposed development. Its south front is likely to be attractively composed, with relatively few detracting elements, but the development would not be visible from those viewpoints.	
<i>Contribution of Setting to Significance of Asset:</i> Incidental. The current setting provides the sense of a parkland appropriate to a larger and more extravagant house, which is at odds with the clearly prosaic nature of the former farmhouse. The principal elevation faces south, and this is where it is best appreciated. The intermittent and seasonal presence of caravans, and the permanent presence of holiday facilities, detract from its overall appearance.	
<i>Magnitude of Effect:</i> The proposed development would be located some distance from the property, and at least partly screened by intervening structures and trees. The building is a recessive visual feature and is largely screened from view save for the roadside. The development would not affect the ability to appreciate the significance of the building. The development would introduce a significant non-agricultural visual element to the area.	
<i>Magnitude of Impact:</i> Negligible change + Medium value asset = Neutral/Slight effect	
<i>Overall Impact Assessment:</i> Negligible Adverse	

4.3.1 CHURCHES AND PRE-REFORMATION CHAPELS

Church of England parish churches and chapels; current and former places of worship

Most parish churches tend to be associated with a settlement (village or hamlet), and therefore their immediate context lies within the setting of the village (see elsewhere). Church buildings are usually Grade II* or Grade I Listed structures, on the basis they are often the only surviving medieval buildings in a parish, and their nature places of religious worship.

In more recent centuries the church building and associated structures functioned as *the* focus for religious devotion in a parish. At the same time, they were also theatres of social interaction, where parishioners of differing social backgrounds came together and renegotiated their social contract.

In terms of setting, many churches are still surrounded by their churchtowns. Viewed within the context of the settlement itself, churches are unlikely to be affected by the construction of residential developments unless it is to be located in close proximity. The location of the church within its settlement, and its relationship with these buildings, would remain unchanged: the

church often being the visual focus on the main village street.

This is not the case for the church tower. While these structures are rarely open to the public, in rural communities they are frequently the most prominent visual feature in the landscape, especially where the church is itself located in a topographically prominent location. The towers of these structures were clearly *meant* to be highly visible, ostentatious reminders of the presence of the established church with its message of religious dominance/assurance. However, churches were often built and largely maintained by their laity, and as such were a focus for the *local* expression of religious devotion. It was this local devotion that led to the adornment of their interiors and the elaboration of their exteriors, including the tower.

Where parishes are relatively small, the tower would be visible to the residents of multiple parishes. This would have been a clear expression of the religious devotion – or rather, the competitive piety – of a particular social group. This competitive piety that led to the building of these towers had a very local focus, and very much reflected the aspirations of the local gentry. If the proposed development is located within the landscape in such a way to interrupt line-of-sight between church towers, or compete with the tower from certain vantages, then it would very definitely impact on the setting of these monuments.

As the guidance on setting makes clear, views from or to the tower are less important than the contribution of the setting to the significance of the heritage asset itself. The higher assessment for the tower addresses the concern it will be affected by a new and intrusive element in this landscape.

Churchyards often contained Listed gravestones or box tombs, and associated yard walls and curtilage are usually also Listed. The setting of all of these assets is usually extremely local in character, and local blocking, whether from the body of the church, church walls, shrubs and trees, and/or other buildings, always plays an important role. As such, the construction of a wind turbine is unlikely to have a negative impact.

What is important and why

Churches are often the only substantial medieval buildings in a parish, and reflect local aspirations, prosperity, local and regional architectural trends; they usually stand within graveyards, and these may have pre-Christian origins (evidential value). They are highly visible structures, identified with particular geographical areas and settlements, and can be viewed as a quintessential part of the English landscape (historical/illustrative). They can be associated with notable local families, usually survive as places of worship, and are sometimes the subject of paintings. Comprehensive restoration in the later 19th century means many local medieval churches are associated with notable ecclesiastical architects (historical/associational). The 19th century also saw the proliferation of churches and parishes in areas like Manchester, where industrialisation and urbanisation went hand-in-hand. Churches are often attractive buildings that straddle the distinction between holistic design and piecemeal/incremental development, all overlain and blurred with the ‘patina of age’ (aesthetic/design and aesthetic/fortuitous). They have great communal value, perhaps more in the past than in the present day, with strong commemorative, symbolic, spiritual and social value.

Asset Name: Church of St Paul at Kewstoke	
<i>Parish: Kewstoke</i>	<i>Views to/from site verified: YES (confirmed)</i>
<i>Designation: Grade GI</i>	<i>Value: High</i>
<i>Distance to the site: 0.7km</i>	<i>Condition: Fair</i>
<i>Description: Listing: Parish Church. C12, C13, C15 late C19 restoration including chancel rebuilding, C20 vestry. Rubble, part rough rendered, freestone dressings, nave roof is leaded, chancel has concrete tiles. West tower, nave south porch, south chapel, chancel, and vestry. Tower, two stages, rendered, diagonal buttresses with set-backs rise through parapet as corner pinnacles. Polygonal stair turret at south east corner rises to pyramidal cap. First stage has two 2-light perpendicular west window under plain drip mould. Similar but smaller window with carved stops to south.</i>	

<p>Second stage has one 2-light perpendicular window under drip mould with carved stops per side; all louvres except west which is blank. Quatrefoil pierced parapet, gargoyles at corner. Nave, 3 bays with clerestorey but no aisles. North elevation is rendered, 3 windows; 2 below are 2-light with curvilinear tracery, the third is plain square-headed 2-light under drip mould; there is a plain door in a cusped arched opening. Clerestorey to north and south has three 2-light perpendicular windows under plain parapet. South porch and adjoining south chapel, single storey; porch has heavily moulded doorway and parapet as tower which strangely abuts the mullion of a clerestorey window; chapel has a 3-light lancet window and battlemented parapet. Within porch is C12 south doorway, spiral fluted shafts with scalloped capitals in plain rebates under impost; inner arch has a double zigzag, the outer has a crenellated frieze under billets and zigzags. Door from porch to chapel has a small mutilated single lancet over. Chancel, rebuilt in 1886 with very steep pitch which brings chancel arch within the building, has two 2-light decorated east window and a small quatrefoil window above; to south are 2 plain 2-light perpendicular windows with priest's door between (now shorn of its porch). Vestry added in 1907 has steep pitch and a large 3-light north window. Interior has strongly moulded chancel and tower arches and cusped rear-arches to 2 ground floor north windows. Rood stair has a steep ogee curved doorway under a drip mould surmounted by a grotesque head corbel and a plain door above. Timber rood screen of 1938 does not sit on corbel. There is a similar screen in the rebated and chamfered arch to south chapel; 3-light lancet has heraldic glass painted by W.R. Eginton, c.1825. Fine perpendicular stone pulpit with paired decorated blank arches surmounted by ornate frieze. C14 circular font of pier and capital form. Oak plank south door. Large churchwarden's arms of 1831 painted by T. Penny of Bristol.</p>
<p><i>Supplemental Comments:</i> The stands within a small churchyard, bounded to the south by a walls of stone rubble pierced by a single gateway. This contains metal gates with delicate scrollwork and overhung by a central lantern. The path to the church was of shallow concrete steps, now converted to a slope, with an incongruous tubular steel handrail. The churchyard is on a platform that projects from the hillside and provides an excellent viewing platform over the adjacent lower lying areas. Note that the church at Kewstoke has historical links to Woodspring Priory.</p>
<p><i>Conservation Value:</i> The building has aesthetic value as a vernacular building of complex development, well situated in an elevated position relative to the low-lying former marshland beyond. It has considerable historical/illustrative and historical/associative value as a parish church with a history going back ten centuries, with links to Woodspring Priory. It has high evidential value, as the Listing description is not comprehensive, and its archaeological value is unexplored. It has high communal value for its local congregation.</p>
<p><i>Authenticity and Integrity:</i> The church appears to be in good condition. It remains an authentic place of communal worship.</p>
<p><i>Topographical Location & Landscape Context:</i> The church is located towards the base of the steep NNW-facing lower slopes of Worlebury Hill, on a slight projection from that slope.</p>
<p><i>Setting:</i> The church stands in a small sub-rectangular churchyard bounded by stone walls. Kewstoke Road runs along the contour to the south of the church, above which the wooded slopes of Worlebury Hill rise steeply. There are houses and other structures to east and west, and below to the north. Immediately to the west is the community hall, converted from the parish poorhouse, with the tall double-depth vicarage beyond. To the east is a linear car park, with further historic residential homes beyond. The housing to the north is slotted into the narrow former strip fields here, with two-storey buildings along Crookes Lane, and a long narrow estate of single-storey holiday homes.</p>
<p><i>Principal Views:</i> Principal views are to the church from its entrance and the adjacent road to the south; these look down to the church with the North Somerset Levels as a backdrop. Other views down onto the church are screened by woodland. The raised churchyard provides a viewing platform for looking out over the Level, and views to the Middle Hope ridge, Severn Estuary, and Clevedon are possible. Set out on a platform, the church tower is visible from various points on the Level, although it is more visually recessive given the backdrop of other structures and scattered trees in those views. The key issue for views is the intervisibility with the tower of Woodspring Priory, which forms an intentional eyecatcher in this landscape.</p>
<p><i>Landscape Presence:</i> The tower of the church is visible from various viewpoints across the adjacent part of the North Somerset Level. However, it is set against a backdrop of other buildings and thus it is less prominent than it might otherwise be.</p>
<p><i>Sensitivity of Asset:</i> A greater part of its significance arises from its historical, evidential, and communal value. It has a historical/associative link with Woodspring Priory. Its aesthetic value is the most readily obvious but that is only one component part of its significance.</p>
<p><i>Contribution of Setting to Significance of Asset:</i> Important. It is arguable that the church was deliberately located on this prominent lower-slope site for its views across the Level and intervisibility with Woodspring Priory. However, settlements in these fen-edge environments (e.g. Weston, Milton, Woodspring itself) are typically located towards the lower slopes of the hillsides, and the church would have been founded within an existing settlement. Its topographical location does provide an unusually good viewing platform, and the Levels provide an expansive and largely rural backdrop to the church.</p>
<p><i>Magnitude of Effect:</i> The proposed development would be located some distance from the church, and there would be some partial screening from hedgerows. In most views to the church the development would not appear, and the development would not affect the ability to appreciate the significance of the building itself. However, it would appear in the background in that principal view down to the church from its entrance, and it would interpose itself in views across the Level to and from Woodspring Priory. The development would introduce a significant non-agricultural visual element to the area.</p>
<p><i>Magnitude of Impact:</i> Minor change + High value asset = Moderate/Slight impact</p>

Overall Impact Assessment: **Minor Adverse**



FIGURE 44: THE VIEW FROM THE CHURCHYARD OF ST PAUL'S IN KEWSTOKE TOWARDS WOODSPRING PRIORY AND ACROSS THE PROPOSED PV SITE. WOODSPRING PRIORY IS INDICATED. VIEWED FROM THE SSW, LOOKING NNE.

4.3.1 POST-DISSOLUTION RELIGIOUS FOUNDATIONS

Former monasteries now ruinous, or re-used in a non-gentry secular context

Monasteries and other religious institutions were founded in the medieval period, either *de novo* or on the sites of early collegiate churches (minsters) or other religious foci. These institutions ranged in size from the very small (with perhaps only a prior and one monk) to the very large, with scores of monks or nuns, living and working within vast and impressive complexes supported by extensive estates. Most of these institutions were swept away during the Dissolution in the 1530s following Henry VIII's break with Rome. The Tudor government made an otherwise hostile population complicit by selling or granting the former monastic estates to courtiers and gentry on generous terms, leading to the creation and enrichment of a new group of supportive noblemen.

The fate of the monastic complexes varied according to location and owner. Some, like Buckland Abbey in Devon or Forde Abbey in Dorset, were adapted by their new or subsequent owners into large and impressive stately homes, and the surroundings adapted and landscaped to complement it. Elements of some, as at Sherborne or Tewkesbury, were adopted as the parish church. Others, like the remote Tintern Abbey, were stripped of roof lead and left to ruin. Lastly, some were torn down and the material sold or reused elsewhere, leaving hardly a trace above ground.

This category concerns those monastic houses where the complex was left as a ruin or reused as a stately home; those that survived as churches are dealt with under that category.

What is important and why

The surviving elements of monasteries, alongside parish churches, are often the only substantial medieval buildings in a parish. The ruined examples can be visually impressive, and the adapted buildings have often been augmented to suite successive architectural styles and stand with a

landscapes containing relict monastic features overlain by polite landscaping. They can straddle the distinction between holistic design and piecemeal/incremental development, all overlain and blurred with the 'patina of age' (aesthetic/design and aesthetic/fortuitous). As befits buildings hundreds of years old and subject to development over time, they can be complex and poorly understood. The archaeological potential of these sites is very rarely comprehensively understood (evidential value). The policies and priorities of the monasteries and successor gentry played a key role in the development of the medieval and post-medieval landscape, and the rise and fall of the monasteries, and the adaptation of their buildings, follows national trends with local detail (historical/illustrative). The former monasteries were usually sold to existing or aspiring gentry and could be associated with prominent families (historical/associative). Communal value tends to be limited unless some other, more recent event provides such a focus.



FIGURE 45: THE TOWER OF THE PRIORY, WITH LISTED INFIRMARY TO THE RIGHT; VIEWED FROM THE SSE, LOOKING NNW.

Asset Name: Woodspring Priory	
Parish: Kewstoke	Views to/from site verified: YES, partial
Designation: Grade GIx6, GII*, SAM	Value: High
Distance to the site: 0.8-0.9km	Condition: Good
<p><i>Listing: Priory Church GI</i> <i>Priory Church, partially converted to house. C15 and early C16. Ashlar, slate nave roof, leaded tower roof. Nave, crossing tower, north aisle. Nave of two bays, crossing of one. West front, gabled and flanked by octagonal turrets clearly shows blocked west window, pierced now by two 3-light mullioned windows. Remains of 3 mutilated effigies around window. To south, nave window hood moulds remain, windows blocked, 2-light windows inserted, that to west removed during C20 restoration, not at time of survey, replaced, 3-light cross windows, inserted below. Perpendicular crossing window restored in 1970. Quatrefoil pierced parapet. At east, blocked chancel arch has inserted door and window above. Above crossing, tower shows 2 stages; diagonal buttresses with setbacks terminate in crocketed attached pinnacles; first stage has 3-light perpendicular windows to north and south; second stage has 3-light mullion and transom perpendicular windows under drip moulds on all sides; they are blank below transom, pierced above. The quatrefoil parapet dates from the restoration of 1827. North aisle, of 3 bays, buttresses between of early C16 build; windows as south nave blocked, lights inserted for domestic occupation; slate roof to eaves now lacking parapet. Interior; nave sub-divided as domestic apartments, ground floor has Gothic plasterwork and fittings. Crossing has incomplete early C19 fan-vault on panelled piers with attached shafts; fragmentary evidence of pulpitum. North aisle has 3 bay arcade unchamfered below for screen, only crossing arch now open others blocked by domestic apartments; western bay still has upper rooms, other insertion now removed and evidenced by joist recesses and windows.</i></p>	

Listing: Infirmary G1

Infirmary. C15. Rubble, pantile roof. North elevation has two 2-light transomed perpendicular windows and a later segmental archway. East gable is blank. South elevation has one window as north and recess for stair turret. West end has a smaller 2-light window above a pointed moulded doorway under a hoodmould. Roof is of arch brace collar beam construction with 3 rows of windbraces. C19 restoration removed archway to south chapel. C20 repairs include a concrete brace at wall plate; steel brackets to roof and the rebuilding of the east gable.

*Listing: Farmhouse G11**

Farmhouse range, incorporating what is thought to be the former priors lodging. C16, altered, substantially extended and dated 1701. Rubble, slate roof, raised coped verges ashlar stacks. 2 storeys, 8 windows, continuous moulded string course; 2- and 4-light mullioned casements; door to west has moulded stone surround with segmental head; plank door to east has ovolo-moulded surround. Single storey C19 pentice on slender cast iron columns. Tall stacks with prominent cornice. Interior has massive ornately moulded beams and at east end, first floor, is a C16 place in unfinished state. Possibly the priors lodging, incomplete at the Dissolution.

Listing: Great Barn G1

Barn. C15. Rubble, ashlar, pantiles roof, coped raised verges and saddlestones. Large barn with south 7 bays divided by buttresses with set offs; diagonal buttresses at four corners and on south gabled porch, these having circular bases. Minor doorways with four centred heads to all bays to south (except westernmost) and to sides of porch; that in easternmost bay a later addition. North side, having lost its transept, shows only a blocked doorway and a blocked window. Roof is of arch brace, collar and tie beam construction with a single tier of windbraces - a replica of 1934. At east end, a well with a flight of steps into the well to its rock-cut level.

Listing: West Wall of the Chapter House G1

Remaining west wall of east range of buildings including chapter house. C15 and earlier, restored C19. Coursed rubble, freestone dressings. 10 foot high wall showing remains of doorways to chapter house and parlour; chapter house doorway under reset cusped head; blank parlour doorway visible to east.

Listing: East Cloister Wall G1

Remaining west wall of east range of buildings including chapter house. C15 and earlier, restored C19. Coursed rubble, freestone dressings. 10 foot high wall showing remains of doorways to chapter house and parlour; chapter house doorway under reset cusped head; blank parlour doorway visible to east.

Listing: Gatehouse, Gates, Mounting Block, and Wall G1

Remains of gatehouse. C14/C15. Coursed rubble with freestone dressings. Double chamfered, segmental headed carriage archway under ogee mould with adjoining simple chamfered pedestrian entrance. Gates restored (probably C19). Low wall projecting at south with mutilated shield corbel terminating in large mounting block with 6 steps. Later coursed rubble wall running south.

Scheduling: Woodspring Priory

The monument includes Woodspring Priory and its associated fishponds and field system, all situated on level ground to the north of Sand Rhyne and overlooked by a ridge to the north, in the area of the Somerset Levels. The monument is named after the spring which occurs in the north eastern part of the site and was originally known as Worspring. The monument survives in the form of buried remains, visible earthworks and upstanding masonry structures which are Listed Grade I. The monument was founded by Augustinian canons soon after 1230 following the abandonment of an earlier site known as Dodlinch, probably in south Somerset. The site developed from a chapel dedicated to St Mary and St Thomas of Canterbury. Its founder, William de Courtenay, was the grandson of one of the assassins of Thomas Becket. This incident appears to have been an important theme at Woodspring, as the scene of the assassination was depicted in the seal of the site. William de Courtenay also provided the Manors at Woodspring, Worle and Locking in order to generate an income for the site; however it appears that the priory was not an especially wealthy one. It was finally dissolved in 1536. Partial excavations were conducted at the site in 1883, when the foundations of the chancel were revealed, and also by D Tomalin on behalf of the Landmark Trust in the early 1970s. The priory developed gradually over 300 years, culminating in significant changes in the 15th century, including the addition of a new Perpendicular style church, infirmary and tithe barn. The site was arranged around a central cloister; this was square in plan with dimensions of 30m by 25m. The priory church was situated to the north of the cloister and the dormitory blocks and associated buildings were arranged around the remaining three sides. The agricultural buildings, which were orientated north west by south east, were separated from the religious structures and were situated to the west. Several of the original medieval buildings survive largely intact. These include a rectangular stone building with dimensions of 15m by 8m situated in the south eastern area of the priory complex. This structure represents the 15th century infirmary and is Listed Grade I. It has a doorway in the eastern corner of the north-facing wall and four ornamental glazed windows. The roof tiles have been replaced, but the internal structure of the roof is intact, although restored. On the north western edge of the site is a 14th century tithe barn, which is Listed Grade I. This has internal dimensions of 40m by 12m and survives virtually intact. The remains of a stone gatehouse are located to the west of the main priory complex; the gate, its mountings and a section of wall running 20m to the south are all Listed Grade I. Some elements of the original priory church also survive as upstanding remains; these include an eastern tower, the nave and north aisle. The tower is 19.5m high and has an octagonal stair turret on the south western corner leading to the ringing chamber. To the east side of the church, the foundations of the early chancel and Lady Chapel are visible as earthworks up to 0.75m high. These features confirm that the 13th century structures were faced with a Triassic stone which was yellowish in colour, whilst in contrast, the 15th century structures were faced with the grey coloured Dundry stone. The survival of elements of the priory church were largely the result of the structure being occupied as a residence

following the Dissolution. The chancel was pulled down but the remaining structure was occupied and remodelled including the blocking of large windows and the insertion of floors within the north aisle and chimneys through the roof of the nave. To the east of the priory buildings, within an area of orchard, are a series of linear depressions with average dimensions of 45m by 10m. These represent fishponds. In the north eastern area there is also a large pool which fills with water following heavy rainfall; this may well mark the site of the spring head after which the site is named. Additional fishponds are known on the western side of the monument. These remain visible as sub-oval shaped depressions with maximum dimensions of 50m by 25m and up to 1.5m deep. To the south of these fishponds are a series of linear depressions up to 125m long and 5m wide orientated north-south; some of these are likely to represent drainage channels as they clearly link the fishponds to the north, while others define cultivation plots. Some of these plots exhibit well developed ridge and furrow, produced by medieval ploughing over an extended period. The ridges have an average width of 6m and the furrows are 1m wide. The difference in height between the base of the furrow and the top of the ridges is c.0.5m. Further cultivation and drainage earthworks are visible on the northern side of the river. These survive as linear features with a maximum height of c.0.5m. A number of features within the area are excluded from the scheduling; these include: the 17th century farmhouse which is Listed Grade II* and situated to the west of the priory church, the nave and tower of the church which is Listed at Grade I, all modern cottages and modern farm buildings, the water trough, the metalled surfaces and all fence posts and gates relating to field boundaries; the ground beneath all these features is, however, included. The scheduling includes the following Grade I Listed structures: the infirmary building, the tithe barn, the gatehouse including gates, mountings and the associated wall running for 20m to the south, the chapter house wall and the eastern cloister wall.

Supplemental Comments: The Scheduled area contains seven high-value Listed structures. Only the Infirmary, east side of the Priory building, and the Scheduled areas to the east and south were publicly accessible. The enclosures to the east side of the priory are full of earthworks (partly explored by the YCCCART surveys) and clearly represent additional ranges of buildings (pottery and oyster shell noted in animal burrows). Since the NT/Landmark Trust took over there has been a policy of tree planting, most notably around the southern perimeter, which is aesthetically pleasing but serves to conceal the buildings and threatens the below-ground archaeology. Repairs to the building and boundary wall were being undertaken during the site visit.

Conservation Value: The complex has very high evidential value as the listing descriptions are incomplete and the below-ground archaeology largely unexplored. It has high historical/associative and illustrative value as a long-term monastic institution holding land across the North Somerset Level, which was passed between Tudor courtiers before being adapted into a country house, falling in status to a tenanted farm. These are all vernacular buildings or high quality and attractive composition; the publicly-accessible elements fall within a walled enclosure where the modern elements are few or unintrusive. Limited or no communal value.

Authenticity and Integrity: The complex is in good repair (and repairs were taking place during the site visit). Since the Landmark Trust took control of the complex it has been adapted to serve a number of functions, including holiday let, which undermines its authenticity but ensure integrity (e.g. features of its use as a farmstead, such as the large tractor door in the east wall of the Infirmary, have been tidily 'corrected').

Topographical Location & Landscape Context: The complex is located on the lower south-facing slopes of the Middle Hope ridge, just above the North Somerset Level.

Setting: The complex stands on rising ground to the northern side of the North Somerset Level, within a patchwork of largely rectilinear fields with more open rough grazing along the Middle Hope ridge to the north. The Scheduled area is divisible into four parts. To the west is an area of open pasture fields containing earthworks (fish ponds) and drainage features. To the west is a walled enclosure containing earthworks (building platforms etc.) and scattered orchard trees. Management appears to take a light-touch approach here, with tall grasses and wild flowers. To its south-east side is a pair of early 20th cottages built in a vernacular style with brick dressings, adjacent to a modern farmstead of several ranges of steel portal-framed sheds around a linear concrete yard (largely screened from the rest of the complex by trees). To the centre of the site stands the surviving monastic buildings attached to several walled courts (the walls being the remains of the chapterhouse and cloister). These areas are well-kept and tidy. West of this is a second complex of farm buildings, some of which are historic, but the larger examples are 20th century in date, with concrete yards. These stand in front of the monastic barn, which is addressed by the track that loops around the southern side of the complex. A later 20th century house stands to the west of the barn. The most historic parts of the complex are screen by high walls and/or trees from the 20th century parts.

Principal Views: Views within and across the complex are limited by intervening structures and trees. The key views are to the complex, from viewpoints across the Level from the south, and across the complex from the Middle Hope ridge to the north.

Landscape Presence: The tower of the Priory is a landmark asset.

Sensitivity of Asset: A greater part of its significance arises from its historical, evidential, and communal value. It has a historical/associative link with Kewstoke Church. Its aesthetic value is the most readily obvious but that is only one component part of its significance.

Contribution of Setting to Significance of Asset: Important. Although settlements in these fen-edge environments (e.g. Weston, Milton, Kewstoke) are typically located towards the lower slopes of the hillsides, and the tower of the priory is somewhat later than the foundation. Its size and prominence was clearly intentional when it was built, and the Levels provide an expansive and largely rural backdrop to the church.

Magnitude of Effect: The proposed development would be located some distance from the complex, and there would be some partial screening from hedgerows. In some views to the Priory tower the development would not appear, and

the development would not affect the ability to appreciate the significance of the complex building itself. However, it would appear in the background in many views across the Level, and it would interpose itself in views across the Level to and from Kewstoke. The development would introduce a significant non-agricultural visual element to the area.

Magnitude of Impact: Minor change + Very High value asset complex = Moderate/Large effect

Overall Impact Assessment: **Minor Adverse** [principally affects Priory tower]



FIGURE 46: VIEW ACROSS THE CLUSTER OF HIGH VALUE ASSETS AT WOODSPRING FROM THE MIDDLE HOPE RIDGE. IN THE BACKGROUND IS WORLEBURY HILL WITH KEWSTOKE AT ITS BASE. THE PROPOSED PV SITE WOULD BE LOCATED IN THE FIELDS BEHIND THE PRIORY. VIEWED FROM THE NNE, LOOKING SSW.

4.3.1 LISTED COTTAGES AND STRUCTURES WITHIN HISTORIC SETTLEMENTS

Clusters of Listed Buildings within villages or hamlets; occasionally Conservation Areas

The context of the (usually) Grade II Listed buildings within settlement is defined by their setting within the village settlement. Their significance is determined by their architectural features, historical interiors or role/function in relation to the other buildings. The significance of their setting to the experience of these heritage assets is of key importance and for this reason the curtilage of a property and any small associated buildings or features are often included in the Listing and any changes must be scrutinised under relevant planning law.

Most village settlements have expanded significantly during the 20th century, with rows of cottages and modern houses and bungalows being built around and between the older 'core' Listed structures. The character of the settlement and setting of the heritage assets within it are continually changing and developing, as houses have been built or farm buildings have been converted to residential properties. The setting of these heritage assets within the village are rarely influenced the erection of wind turbines, unless they are located in close proximity to the settlement. The relationships between the houses, church and other Listed structures will not be altered, and it is these relationships that define their context and setting in which they are primarily to be experienced.

The larger settlements and urban centres usually contain a large number of domestic and commercial buildings, only a very small proportion of which may be Listed or protected in any way.

The setting of these buildings lies within the townscape, and the significance of these buildings, and the contribution of their setting to that significance, can be linked to the growth and development of the individual town and any associated industries. The original context of any churches may have changed significantly since construction, but it usually remains at the heart of its settlement. Given the clustering of numerous individual buildings, and the local blocking this inevitably provides, a distant turbine unlikely to prove particularly intrusive.

What is important and why

Historic settlements constitute an integral and important part of the historic landscape, whether they are hamlets, villages, towns or cities. The physical remains of previous occupation may survive beneath the ground, and the built environment contains a range of vernacular and national styles (evidential value). Settlements may be archetypal, but development over the course of the 20th century has homogenised most, with streets of terraced and semi-detached houses and bungalowoid growths arranged around the medieval core (limited historical/illustrative value). As dynamic communities, there will be multiple historical/associational values relating to individuals, families, occupations, industry, retail etc. in proportion to the size and age of the settlement (historical/associational). Settlements that grew in an organic fashion developed fortuitously into a pleasing urban environment (e.g. Totnes), indistinguishable suburbia, or degenerate urban/industrial wasteland (aesthetic/fortuitous). Some settlements were laid out quickly or subject to the attention of a limited number of patrons or architects (e.g. late 19th century Redruth and the architect James Hicks, or Charlestown and the Rashleigh family), and thus strong elements of design and planning may be evident which contribute in a meaningful way to the experience of the place (aesthetic/design). Component buildings may have strong social value, with multiple public houses, clubs, libraries (communal/social), chapels and churches (communal/spiritual). Individual structures may be commemorative, and whole settlements may become symbolic, although not always in a positive fashion (e.g. Redruth-Camborne-Pool for post-industrial decline) (communal/symbolic). Settlements are complex and heterogeneous built environments filled with meaning and value; however, beyond a certain size threshold distant sight-lines become difficult and local blocking more important.

Asset Name: Owl's Cottage café	
<i>Parish: Kewstoke</i>	<i>Views to/from site verified: NO</i>
<i>Designation: Grade GII</i>	<i>Value: Medium</i>
<i>Distance to the site: 0.7km</i>	<i>Condition: Good</i>
<i>Description: Listing: House, now restaurant. C17 altered and extended C19 and C20. Roughcast, double Roman tile roof. Former cross passage plan. 2 storeys, 3 windows. All windows 2- or 3-light C19 casements with C20 ornamental shutter. 3 windows on ground floor with door off-centre right under C20 mock rustic porch, 2 windows above. 2 storey C20 extension to rear. Interior has deep stopped chamfered beams throughout. Winder stair with solid oak treads in semi-circular stair turret with square single light window.</i>	
<i>Supplemental Comments: Again, this could be a medieval structure with floors and stack inserted in the 17th century. It is very low relative to the roadside, the entrance accessed down steps. This could indicate the house has been 'turned' i.e. it originally faced north. Attached to the east is Owl's Crest House, a tall two-storey late 19th century house with walls of polygonal stone rubble with roughly dressed quoins, a pitched pan-tile roof, symmetrical 2/1/2 frontage with central door, and 2x2 horned sashes. The height of this building contrasts strongly with that of Owl's Café, implying the latter may have become a service building in the 19th century. The Listed K6 telephone box is located just outside the café.</i>	
<i>Conservation Value: The building is not unattractive, and uses vernacular materials, but it is set down into the slope in such a way as to make it very difficult to appreciate that vernacular aesthetic. It will have evidential value as the Listing is not very detailed – this could easily be medieval in origin with inserted floors and stack. It has historic/ illustrative value as an example of a vernacular building. No true communal value.</i>	
<i>Authenticity and Integrity: The building is in good repair. Its authenticity as a farmhouse is likely to have been compromised by conversion to service wing, dwelling, then café.</i>	
<i>Topographical Location & Landscape Context: The church is located towards the base of the steep NNW-facing lower slopes of Worlebury Hill.</i>	
<i>Setting: The café is located towards the centre of the historic village. Kewstoke Road runs immediately to the south, with Crookes Lane branching off to the north just to the east. Accordingly, the road widens here in front of the café. The front garden of the café is bounded by a modern rendered wall with brick details; the K6 telephone box stands</i>	

to the west end of this wall. The taller Owl's Crest House stands to the east. South of the road is a short terrace of late 19th century houses of polygonal stone rubble with brick detailing with small yards with stone walls in front. A historic house (probably 17th century in date but unlisted) stands within its garden to the west. Below the café to the north is the New Inn and a back yard, with further houses beyond.

Principal Views: Limited to those from the adjacent road.

Landscape Presence: None. It is visually recessive and one among many buildings here.

Sensitivity of Asset: The value of this building is largely evidential and historical/illustrative, neither of which would be affected by the proposed development. It has some aesthetic value, but this is only really to be appreciated within its immediate setting.

Contribution of Setting to Significance of Asset: Incidental. While the current setting does not actively detract from the appearance of the building, it could be more sympathetic. It is already difficult to appreciate the significance of this structure.

Magnitude of Effect: The proposed development would be located some distance from the property, and probably fully screened by intervening structures and trees. The building is a very recessive visual feature. The development would not affect the ability to appreciate the significance of the building.

Magnitude of Impact: No Change + Medium value asset = Neutral effect

Overall Impact Assessment: **Neutral**



FIGURE 47: THE OWL'S COTTAGE CAFÉ; VIEWED FROM THE SOUTH-EAST, LOOKING NORTH-WEST. LISTED K6 TELEPHONE BOX TO THE LEFT.

4.3.2 PREHISTORIC RITUAL/FUNERARY MONUMENTS

Stone circles, stone rows, barrows and barrow cemeteries

These monuments undoubtedly played an important role in the social and religious life of past societies, and it is clear they were constructed in locations invested with considerable religious/ritual significance. In most instances, these locations were also visually prominent, or else referred to prominent visual actors, e.g. hilltops, tors, sea stacks, rivers, or other visually prominent monuments. The importance of intervisibility between barrows, for instance, is a noted phenomenon. As such, these classes of monument are unusually sensitive to intrusive and/or disruptive modern elements within the landscape. This is based on the presumption these monuments were built in a largely open landscape with clear lines of sight; in many cases these monuments are now to be found within enclosed farmland, and in varying condition. Sensitivity to turbines is lessened where tall hedgebanks restrict line-of-sight.

What is important and why

Prehistoric ritual sites preserve information on the spiritual beliefs of early peoples, and archaeological data relating to construction and use (evidential). The better examples may bear names and have folkloric aspects (historical/illustrative) and others have been discussed and illustrated in historical and antiquarian works since the medieval period (historical/associational). It is clear they would have possessed design value, although our ability to discern that value is limited; they often survive within landscape palimpsests and subject to the ‘patina of age’, so that fortuitous development is more appropriate. They almost certainly once possessed considerable communal value, but in the modern age their symbolic and spiritual significance is imagined or attributed rather than authentic. Nonetheless, the location of these sites in the historic landscape has a strong bearing on the overall contribution of setting to significance: those sites located in ‘wild’ or ‘untouched’ places – even if those qualities are relatively recent – have a stronger spiritual resonance and illustrative value than those located within enclosed farmland or forestry plantations.

Asset Name: Bowl and Disc Barrow at Sandpoint	
<i>Parish: Kewstoke</i>	<i>Views to/from site verified: YES</i>
<i>Designation: SAM</i>	<i>Value: High</i>
<i>Distance to the site: 1.8km</i>	<i>Condition: Fair</i>
<i>Description: Scheduling: The monument includes a bowl barrow and a disc barrow, aligned east-west, and situated on the crest of a coastal promontory overlooking Sand Bay 600m NNW of Sandpoint Farm. The bowl barrow, the western of the pair, has a mound c.0.5m high and 10m in diameter surrounded by a ditch from which material was quarried during the construction of the monument. This has become infilled over the years but survives as a buried feature c.2m wide. The top of the mound has a flattened appearance; an OS triangulation point is situated on the eastern side. The disc barrow is situated c.6m east of bowl barrow and has an external bank c.0.2m high and slight internal ditch defining an area c.8m across. Within the north-east section of the inner area lies a slight mound c.0.2m high by 0.8m wide. The OS triangulation point is excluded from the scheduling, although the underlying ground is included.</i>	
<i>Supplemental Comments: The grass was very closely cropped at the time of the site visit. The bowl barrow survived as a very subtle earthwork (0.5m high is a generous estimate); the disc barrow was imperceptible. Some erosion to the base of the trig point.</i>	
<i>Conservation Value: Under any other ground conditions the bowl barrow would be effectively invisible; it is doubtful anyone unaware of its existence would notice it was there, so very limited aesthetic value. Clear evidential and historical/illustrative value. No communal value.</i>	
<i>Authenticity and Integrity: Clearly authentic burial monuments; some damage to the bowl barrow around the base of the trig point.</i>	
<i>Topographical Location & Landscape Context: The barrows are located on the highest part of the westernmost end of the Middle Hope ridge, above Swallowcliff. The ridge is quite narrow anyway, but here it begins to narrow to the point, c.0.7km to the west. The barrows are to the centre of the ridge, so the ground does not immediately fall away steeply. The top of the ridge is quite flat.</i>	
<i>Setting: The monuments are located towards the western end of the Middle Hope ridge, where it begins to narrow. The summit of the ridge is of closely-cropped grass, the steep sides to the north and south are more overgrown/scrubby, with scattered larger hedge shrubs (hawthorn etc.). Paths rise to the summit from the car park at Sandpoint and run along the ridge from east to west. It is extremely exposed, and very open to the estuary.</i>	
<i>Principal Views: Panoramic views of the entire area are possible from this location, although back along the ridge to the east they are less pronounced – the eye is naturally drawn to the theatre of the estuary, not back to the land.</i>	
<i>Landscape Presence: The location is prominent, but the monuments are practically invisible.</i>	
<i>Sensitivity of Asset: The monuments have a very slight physical expression. The key feature of this location is its remoteness from modern development, and its very rural feel.</i>	
<i>Contribution of Setting to Significance of Asset: Paramount. This location was deliberately selected for its physical (and spiritual) qualities. While the monuments have historical and evidential value, that value is likely to be limited. This is an extremely liminal location, even allowing for landscape change following the Bronze Age, and is likely to be more about the seascape than the landscape.</i>	
<i>Magnitude of Effect: The proposed development would be located some distance from the monuments, with some (albeit limited) screening from hedgerows/trees. The monuments are very slight. The development would not affect the ability to appreciate the significance of the monuments, which look seaward. The development would introduce a significant non-agricultural visual element to the area when looking back to the south-east.</i>	
<i>Magnitude of Impact: Minor change + High value asset = Moderate/Slight effect</i>	
Overall Impact Assessment: Minor Adverse	



FIGURE 48: THE BOWL BARROW (BENEATH AND TO THE LEFT OF THE TRIG POINT); VIEWED FROM THE EAST, LOOKING WEST.

4.3.3 MEDIEVAL CASTLES AND MOATED SITES

Masonry castles, motte & bailey castles, moated sites, manorial sites

Castles are large masonry or timber structures with associated earthworks that were built during the medieval period (c.1050-1500). These structures were built with defence in mind, and were often constructed in highly prominent locations. They were also expressions of status and power, and thus highly visible statements about the wealth and power of their owners. They are designed to see and be seen, and thus the impact of wind turbines is often disproportionately high compared to their height or proximity. High status manorial sites could also be enclosed and 'defendable'; both types of monument could be associated with deer parks, gardens or pleasure grounds.

What is important and why

Other than churches, castles – ruined or otherwise – are often the most substantial medieval structures to survive in the landscape, and associated with extensive buried remains (evidential). The larger and better-preserved examples are iconic and grandiose expressions of political power and status. Most can be associated with notable families and some have been the scene of important historical events, represented in literature, art and film (historical/associational). All were originally designed structures, located within a landscape manipulated for maximum strategic and visual advantage (aesthetic/design). The passage of time has reduced some to ruins and others to shallow earthwork; some survived as great houses. All have been subject to the rigours of time, so the current visual state can best be described as a fortuitous development. Communal value is limited, although the ones open to the public are heritage venues, and the larger ruined examples retain a grandeur that borders on the spiritual/romantic. In the past there would have been a strong communal element. They may or may not retain a curtilage of associated buildings, and may or may not retain an associated landscape park or deerpark.



FIGURE 49: THE 'MOTTE AND BAILEY' AT THE WESTERN TIP OF THE MIDDLE HOPE RIDGE; VIEWED FROM THE EAST, LOOKING WEST.

Asset Name: Motte & Bailey Castle at Sandpoint	
<i>Parish:</i> Kewstoke	<i>Views to/from site verified:</i> YES
<i>Designation:</i> SAM	<i>Value:</i> High
<i>Distance to the site:</i> 1.85km	<i>Condition:</i> Fair
<p><i>Description: Scheduling:</i> The monument includes a motte and bailey castle situated on the crest of a coastal promontory overlooking Sand Bay 650m NNW of Sandpoint Farm. The motte, known variously as Castle Mound and Castle Batch, is an artificial mound c.30m in diameter and c.2m high. It is situated within the south-west area of the monument and is surrounded by a rock-cut ditch c.8m wide from which material was quarried during its construction. The ditch is visible on the eastern side of the motte as an earthwork c.1.5m deep; elsewhere it survives as a buried feature. Adjacent to the motte is the bailey. This feature is defined by the ditch surrounding the motte in the west and the steep natural slopes of the hill to the south and north. To the east it is defined by the extent of visible earthworks. Numerous building platforms, some surviving to a height of c.0.5m, are visible in this area of the monument. The eastern area of the bailey has been partly disturbed by military activity, possibly dating from the Second World War.</p>	
<p><i>Supplemental Comments:</i> The description of this monument as a motte and bailey is highly dubious. Firstly, it is very small – hardly room for a tower, and no room for all the other ancillary structures required for a functioning manorial caput. Secondly, while it is located in a very naturally defensible location, it is not itself very strongly defended, and the location is highly inconvenient unless supplied by sea. Thirdly, it is difficult to see what functional use it could have (assuming it as meant to <i>have</i> a functional use) as it is so remote from centres of population or other defensible assets (though it is acknowledged that Middle Hope was once inhabited). Parts of the monument were mown, and other parts beaten down by foot traffic (leading to localised erosion); the building platforms were not visible. It is considered more likely that this was some other kind of fortification, which further investigation might be able to explore. The 1539 map of <i>The coste of England upon Severne</i> (Down & Webb 2016, 32-35) shows the intended distribution of artillery forts, and this presents as a more likely explanation.</p>	
<p><i>Conservation Value:</i> Some aesthetic value. Clear evidential value, but historical/illustrative value is limited as its origin and function are debatable. No communal value.</p>	
<p><i>Authenticity and Integrity:</i> Clearly authentic ?defensive monument; some damage around the southern side arising from foot traffic.</p>	
<p><i>Topographical Location & Landscape Context:</i> The monument is located on the highest part of the westernmost end of the Middle Hope ridge, above Swallowcliff. The ridge is quite narrow anyway, but here it begins to narrow to the point, c.0.7km to the west. The monument is to the centre of the ridge, and the ground immediately falls away steeply to the north and south.</p>	
<p><i>Setting:</i> The monument is located towards the western end of the Middle Hope ridge. The summit of the ridge is of closely-cropped grass, the steep sides to the north and south are more overgrown/ scrubby, with scattered larger hedge shrubs (hawthorn etc.). Paths rise to the summit from the car park at Sandpoint and run along the ridge from east to west. It is extremely exposed, and very open to the estuary.</p>	

<i>Principal Views:</i> Panoramic views of the entire area are possible from this location, although back <i>along</i> the ridge to the east they are less pronounced – the eye is naturally drawn to the theatre of the estuary, not back to the land.
<i>Landscape Presence:</i> The location is prominent, and the ‘motte’ is clear upstanding monument, but not one readily appreciated on the wider scale.
<i>Sensitivity of Asset:</i> The monument is prominent within its immediate setting, but the key feature of this <i>location</i> is its remoteness from modern development, and its very rural feel.
<i>Contribution of Setting to Significance of Asset:</i> Paramount. This location was deliberately selected for its physical qualities. While the monument has evidential value, its historical value is contingent on a good understanding of its purpose and function – which we do not have. Assuming it was <i>not</i> a traditional medieval castle, and represents a later defensive structure, its location here would make the seaward approach the most important.
<i>Magnitude of Effect:</i> The proposed development would be located some distance from the monument, with some (albeit limited) screening from hedgerows/trees. The development would not affect the ability to appreciate the significance of the monument, which looks seaward. The development would introduce a significant non-agricultural visual element to the area when looking back to the south-east.
<i>Magnitude of Impact:</i> Minor change + High value asset = Moderate/Slight effect
<i>Overall Impact Assessment:</i> Negligible Adverse

4.3.4 HISTORIC LANDSCAPE

General Landscape Character

The landscape of the British Isles is highly variable, both in terms of topography and historical biology. Natural England has divided the British Isles into numerous ‘character areas’ based on topography, biodiversity, geodiversity and cultural and economic activity. The County Councils and AONBs have undertaken similar exercises, as well as Historic Landscape Characterisation.

Some character areas are better able to withstand the visual impact of development than others. Rolling countryside with wooded valleys and restricted views can withstand a larger number of sites than an open and largely flat landscape overlooked by higher ground. The English landscape is already populated by a large and diverse number of intrusive modern elements, e.g. electricity pylons, factories, modern housing estates, quarries, and turbines, but the question of cumulative impact must be considered. The aesthetics of individual developments is open to question, and site specific, but as intrusive new visual elements within the landscape, it can only be **adverse**.

The proposed site would be located within the *Moors* Landscape Character Type (LCT), within the *Kingston Seymour and Puxton Moor* Landscape Character Area (LCA). This is described in Wardell Armstrong 2018 as:

Kingston Seymour and Puxton Moors make up the largest character area of the Moors type and occurs within the centre of the District to the north and east of Weston- Super-Mare. Kingston Seymour and Puxton Moors is distinguished from the other Moor landscape character areas by its earlier enclosure, presence of settlement and generally more irregular field pattern. The boundaries forming the transition to A3 and A4 character areas follow field boundaries, droves, roads and rivers marking this change in pattern. Elsewhere, the boundary follows the settlement edges; changes in vegetation pattern and nature of topography (such as to the east of Yatton); the 10m contour at the base of Worlebury Ridge; and, along the edge of the coast, Mean High Water. Its key characteristics are:

- *Lowland area predominantly of beach and tidal flat deposits with small areas of gravel, peat, Mercia Mudstone and Lias.*
- *Flat landform largely at between 5m and 10m AOD.*
- *Strong sense of remoteness, ruralness and unity.*
- *Pastoral landscape with cattle grazing.*
- *Network of waterways with winding rivers which are embanked, and rhynes and ditches which support a rich diversity of aquatic plants and invertebrates.*
- *Hedgerows intermittent with a proportion formed by regenerated scrub grown up over ditches and rhynes.*
- *Frequent hedgerow trees, oaks and pollard willows.*
- *Medium scale fields are sinuous and irregular in the core of the area and more geometric elsewhere, but this contrast is not easily perceived due to the fragmented hedgerows and large number of hedgerow trees.*

- *Semi-enclosed landscape with trees and hedgerows framing views to the wooded limestone ridges.*
- *Small orchards close to older settlements and farmsteads.*
- *Presence of the sea has limited effect on the landscape character due to the enclosure given by the hedgerows, scrub and hedgerow trees and the visual barrier of the raised sea walls.*
- *Views along rivers and out to sea from are difficult to access due to sea walls and the river embankments counterpoint the pastoral semi-enclosed landscape.*
- *Coastal inter-tidal margins of sand, mudflat and salt marsh.*
- *Scattered farmsteads with a few small villages characterised by older buildings of grey limestone, with church towers forming landmarks in the flat landscape.*
- *19th and 20th century buildings rendered or pebbledashed include farmhouses, infill at the edges of the villages and development along roads particularly the A370.*
- *Winding rural lanes and tracks run between farmsteads and villages often with sinuous roadside ditches, but there is little access to some areas especially close to the sea.*
- *Historic landscape dominated by Saxon and medieval enclosure.*
- *Settlement pattern and minor roads developed in late Saxon period.*

The proposed development would be located towards the centre of that area of reclaimed marsh book-ended by Worlebury Hill to the south, Sand Bay to the west, the Middle Hope ridge to the north and the Banwell River to the east. Most of the general observations made of this character area are borne out here. The ridge to the south screens the area from the urban sprawl of West Wick, Worle, and Weston-super-Mare, the sound of the M5 is muted or imperceptible, and the holiday facilities along Sandbay are not particularly visible or intrusive. One noticeable development here is the proliferation of small sheds and paddocks, facilitated by the disparate pattern of landownership. Out on the Level, hedge shrubs and trees along the ditches provide a good, but not comprehensive, level of screening. The key issue for this site is the existence of elevated viewpoints to the north (the Middle Hope ridge) and south (Worlebury Hill), and less dramatic viewpoints from raised ground along Sand Bay and at Collum Farm. These viewpoints provide clear and uninterrupted views across the landscape, within which the proposed PV development would be highly visible. Mitigation in the form of additional screening is unlikely to be able to offset that visual impact. The overall effect on the historic landscape here of a large modern PV installation is likely to be **minor to moderate adverse**.



FIGURE 50: THE VIEW BACK ACROSS THE LEVEL FROM THE WESTERN TIP OF MIDDLE HOPE RIDGE; VIEWED FROM THE NORTH-WEST, LOOKING SOUTH-EAST.

4.3.5 AGGREGATE IMPACT

The aggregate impact of a proposed development is an assessment of the overall effect of a single development on multiple heritage assets. This differs from cumulative impact (below), which is an assessment of multiple developments on a single heritage asset. Aggregate impact is particularly difficult to quantify, as the threshold of acceptability will vary according to the type, quality, number and location of heritage assets, and the individual impact assessments themselves.

Based on the restricted number of assets where any appreciable effect is likely, but taking into account their high value and the potential for intervisibility, the aggregate impact of this development is **minor adverse**.

4.3.6 CUMULATIVE IMPACT

Cumulative impacts affecting the setting of a heritage asset can derive from the combination of different environmental impacts (such as visual intrusion, noise, dust, and vibration) arising from a single development or from the overall effect of a series of discrete developments. In the latter case, the cumulative visual impact may be the result of different developments within a single view, the effect of developments seen when looking in different directions from a single viewpoint, of the sequential viewing of several developments when moving through the setting of one or more heritage assets.

The Setting of Heritage Assets 2011a, 25

*The key for all cumulative impact assessments is to focus on the **likely significant** effects and in particular those likely to influence decision-making.*

GLVIA 2013, 123

An assessment of cumulative impact is, however, very difficult to gauge, as it must consider existing, consented, and proposed developments. The threshold of acceptability has not, however, been established, and landscape capacity would inevitably vary according to landscape character. However, except for the holiday parks, there is little in the way of largescale development here; the urban sprawl of Weston-super-Mare/Worle is largely concealed by the topography. On that basis the proposed development would have only a very slight cumulative impact in relation to the existing landscape. On that basis, an overall assessment of **negligible** is appropriate.

TABLE 10: SUMMARY OF IMPACTS. SITES IN GREY WERE SCOPED OUT OF THE DETAILED ASSESSMENT.

Asset	Type	Distance	Value	Magnitude of Impact	Assessment	Overall Assessment
Indirect Impacts						
Rose Tree Farmhouse	GII	0.2km	Medium	Negligible	Neutral/Slight	Negligible Adverse
Norton Court Farmhouse	GII	0.2km	Medium	Negligible	Neutral/Slight	Negligible Adverse
Holme Farmhouse	GII	0.3km	Medium	Negligible	Neutral/Slight	Negligible Adverse
Newton's Gate piers	GII*	0.8km	High	No Change	Neutral	Neutral
Ballroom	GII		Medium			
Church of St Paul, Kewstoke	GI	0.7km	High	Minor	Moderate/Slight	Minor Adverse
K^ Telephone Box	GII	0.7km	Medium	No Change	Neutral	Neutral
Owl's Cottage Cafe	GII	0.7km	Medium	No Change	Neutral	Neutral
Motte at Castle Batch	SAM	1.75km	High	No Change	Neutral	Neutral
Woodspring Priory Church	GI	0.8km	High	Minor	Moderate/Large	Minor Adverse
Barn and well 50m to north	GI	0.9km	High	Negligible	Slight	
West wall of Chapterhouse	GI	0.8km	High	Negligible	Slight	
Infirmery	GI	0.8km	High	Negligible	Slight	
East Cloister wall	GI	0.8km	High	Negligible	Slight	
Gatehouse, gates, mounting block, and wall	GI	0.8km	High	Negligible	Slight	
Farmhouse adjoining church	GII*	0.8km	High	Negligible	Slight	
Woodspring Priory etc.	SAM	0.7km	High	Minor	Moderate/Large	
Worle Tower Observatory	GII	0.9km	Medium	No Change	Neutral	Neutral
Church of St Martin, Worle	GII*	1.4km	High	No Change	Neutral	Neutral
119 & 121 Church Road	GII	1.4km	Medium	No Change	Neutral	Neutral
Mendip Cottage	GII	1.5km	Medium	No Change	Neutral	Neutral
The Bell House	GII*	1.5km	High	No Change	Neutral	Neutral

SANDBAY SOLAR, KEWSTOKE, NORTH SOMERSET: RESULTS OF A HERITAGE ASSESSMENT

Asset	Type	Distance	Value	Magnitude of Impact	Assessment	Overall Assessment
Indirect Impacts						
Worle War Memorial	GII	1.6km	Medium	No Change	Neutral	Neutral
Magnolia, Oak Lea Cottage	GII	1.7km	Medium	No Change	Neutral	Neutral
Bowl and disc barrow at Sandpoint	SAM	1.8km	High	Minor	Moderate/Slight	Minor Adverse
Ebdon Bow Bridge	GII	1.8km	Medium	No Change	Neutral	Neutral
Motte & Bailey Sandpoint	SAM	1.85km	High	Minor	Moderate/Slight	Negligible Adverse
Banksea Cottages	GII	2.2km	Medium	No Change	Neutral	Neutral
Church of St Lawrence, WstL Gates, piers, overthrow Cross in churchyard [GII]	GII* GII SAM	2.2km	High Medium High	No Change	Neutral	Neutral
Gervinia Cottage	GII	2.2km	Medium	No Change	Neutral	Neutral
Cemetery Chapel, WestonSM	GII	2.3km	Medium	No Change	Neutral	Neutral
Wick St Lawrence cross [GII*]	SAM	2.2km	High	No Change	Neutral	Neutral
Indirect Impacts						
Historic Landscape	n/a	n/a	High	Minor	Neutral	Minor to Moderate Adverse
Aggregate Impact	n/a	n/a				Minor Adverse
Cumulative Impact	n/a	n/a				Negligible

5.0 CONCLUSION

The site is located towards the centre of an expanse of reclaimed marshland between Kewstoke, Sandbay, and Woodspring Priory. While now part of the ancient ecclesiastical parish of Kewstoke, it probably formed part of the Domesday Manor of Woodspring, or one of the two smaller manors added to Woodspring between 1066 and 1086. The pattern of landholding in this area was, if the tithe survey of 1840 is any guide, exceedingly complex, with many of the fields held as detached parcels belonging to farms in Milton, Newton, Norton, Sand Bay, Woodspring and Worle. This reflects the process by which the moor was reclaimed: common land was enclosed through agreement and allocated to the various stakeholders.

The historic landscape here is characterised as *post-medieval enclosures from anciently reclaimed inland moors*, but it is likely this fieldscape was established during the medieval period, given the way the parish boundary between Worle and Kewstoke zig-zags through the fields and includes detached parcels. Relatively little archaeological fieldwork has been conducted in this area, and this reflects the bias of development pressure which disproportionately falls upon Weston-super-Mare and Worle.

Not unexpectedly, the geophysical survey undertaken shows most of the fields covered by salt-marsh palaeochannels, with most of the archaeological signature drowned out by geological responses. Where the geological response is not overwhelming the survey data shows features relating to the historic agricultural use of the lower lying landscape, with Field 7 showing possible earlier ditches as well. The 'island' occupied by Elmsley Nursery, contains the corner of a rectilinear enclosure with possible internal structure or roundhouse. Notably Roman pottery and coins have been found c.50m to the south of the site, and Roman pottery was recovered during the walkover survey in Field 9. This evidence would suggest the Elmsley was a focus for (probably) Late Prehistoric and (definitely) Romano-British occupation and/or activity. Buried peat deposits are known, probably dating to the Neolithic, but these are likely to occur at such a depth as to be unaffected by proposals.

There are 29 Listed Buildings and four Scheduled monuments within 1km of the proposed development, and two other relevant Scheduled monuments beyond 1km, have been assessed. In terms of indirect impacts, most of the designated heritage assets in the wider area are located at such a distance to minimise the impact of the proposed development, or else the contribution of setting to overall significance is less important than other factors. The landscape context of many of these buildings and monuments is such that they would be partly or wholly insulated from the effects of the proposed development by a combination of local blocking from trees, buildings, or embankments, or that other modern intrusions have already impinged upon their settings. However, the size of the development, and the presence of suitably elevated viewpoints or tall and visually prominent features, would indicate an appreciable effect (*minor adverse*) on three sites: the Church of St Paul at Kewstoke (GI), the Priory Church at Woodspring (GI), and the bowl and disc barrows near Sandpoint Farm (SAM). The greatest effect is likely to fall upon the historic landscape (*minor to moderate adverse*) which is otherwise largely untouched by large visually modern development. On that basis the impact of the proposed development can be assessed as *minor adverse* overall.

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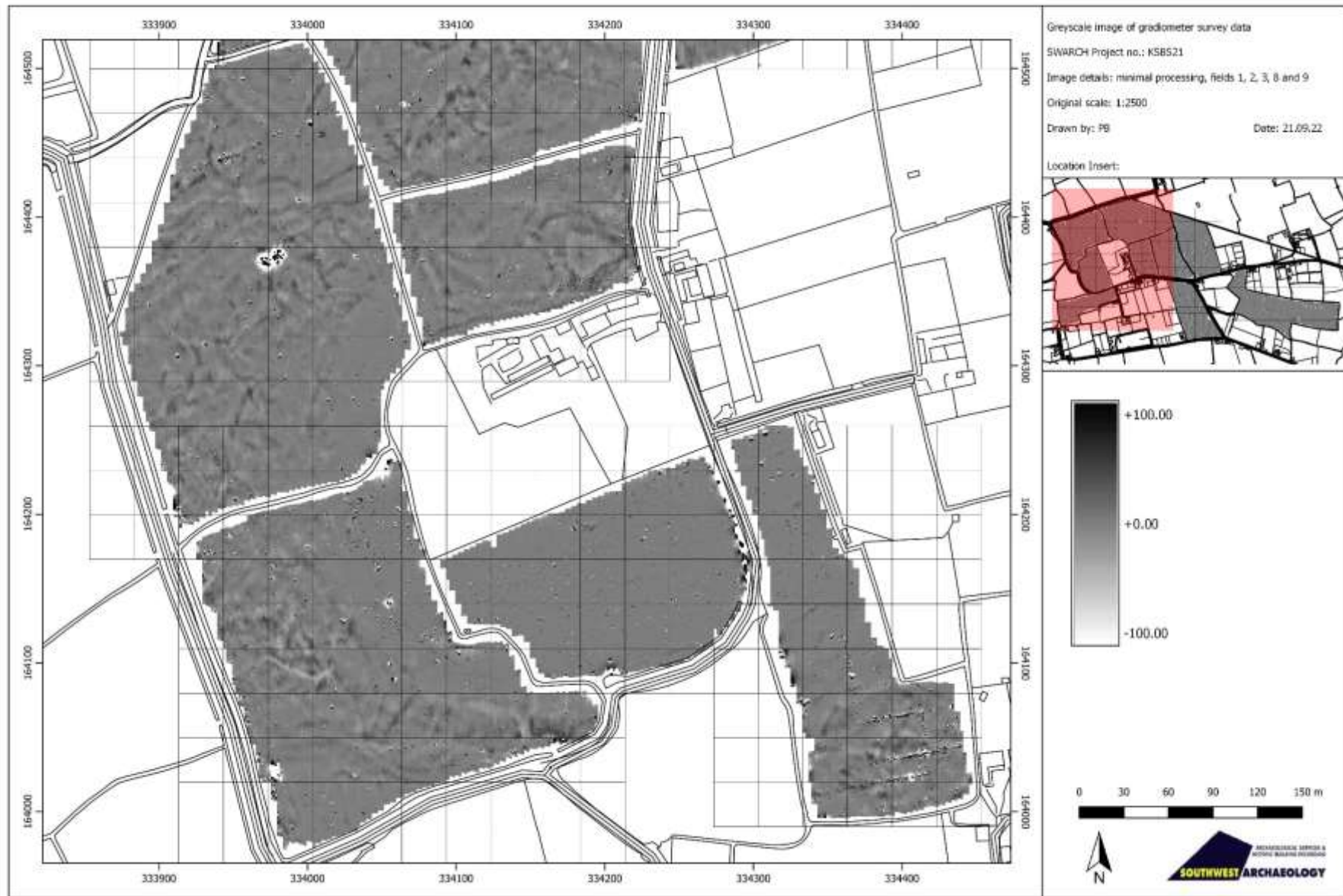
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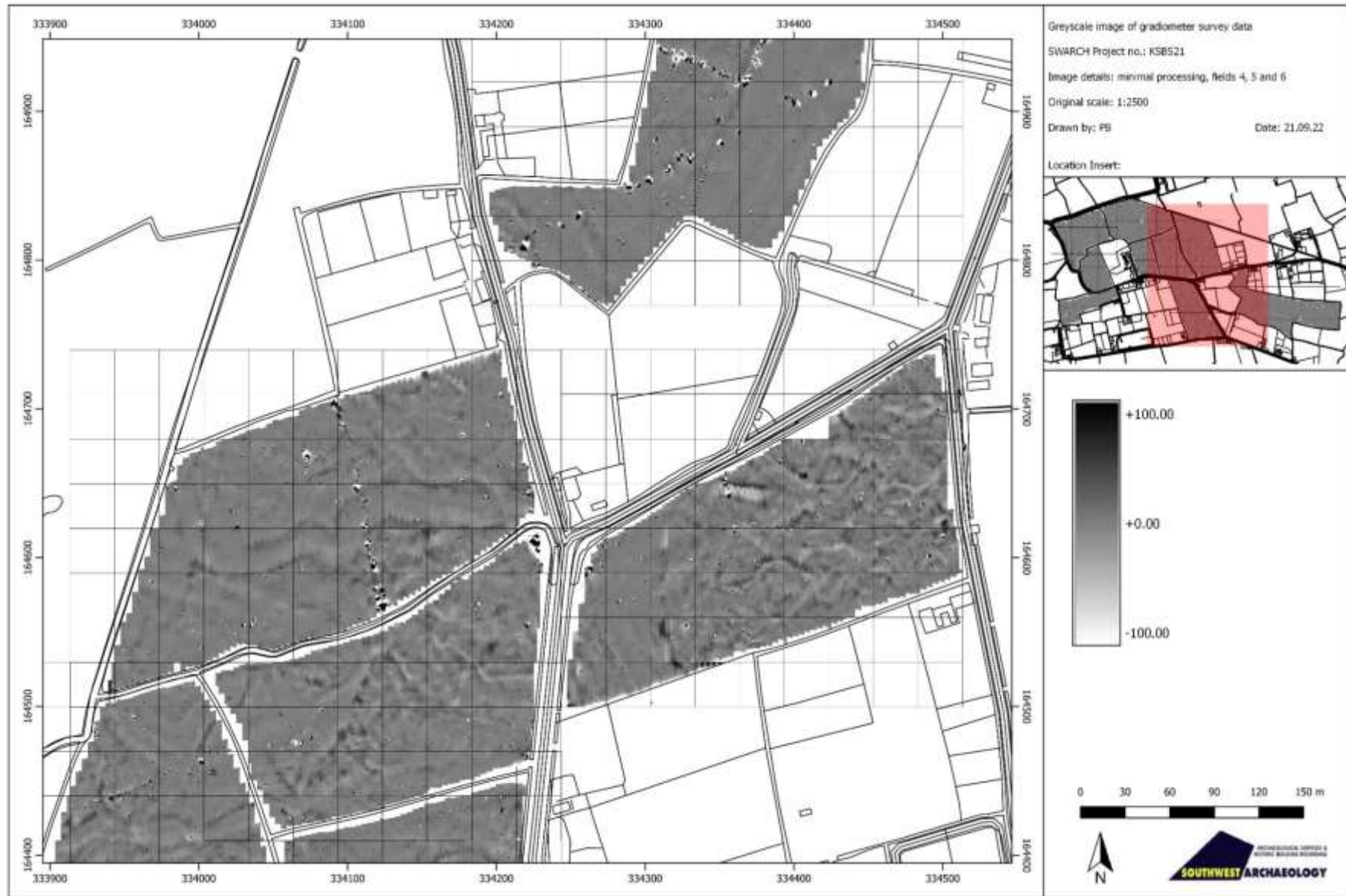
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- YCCART** 2021: *Resistivity survey at Cropmark site near Woodspring Priory, Kewstoke, North Somerset*.

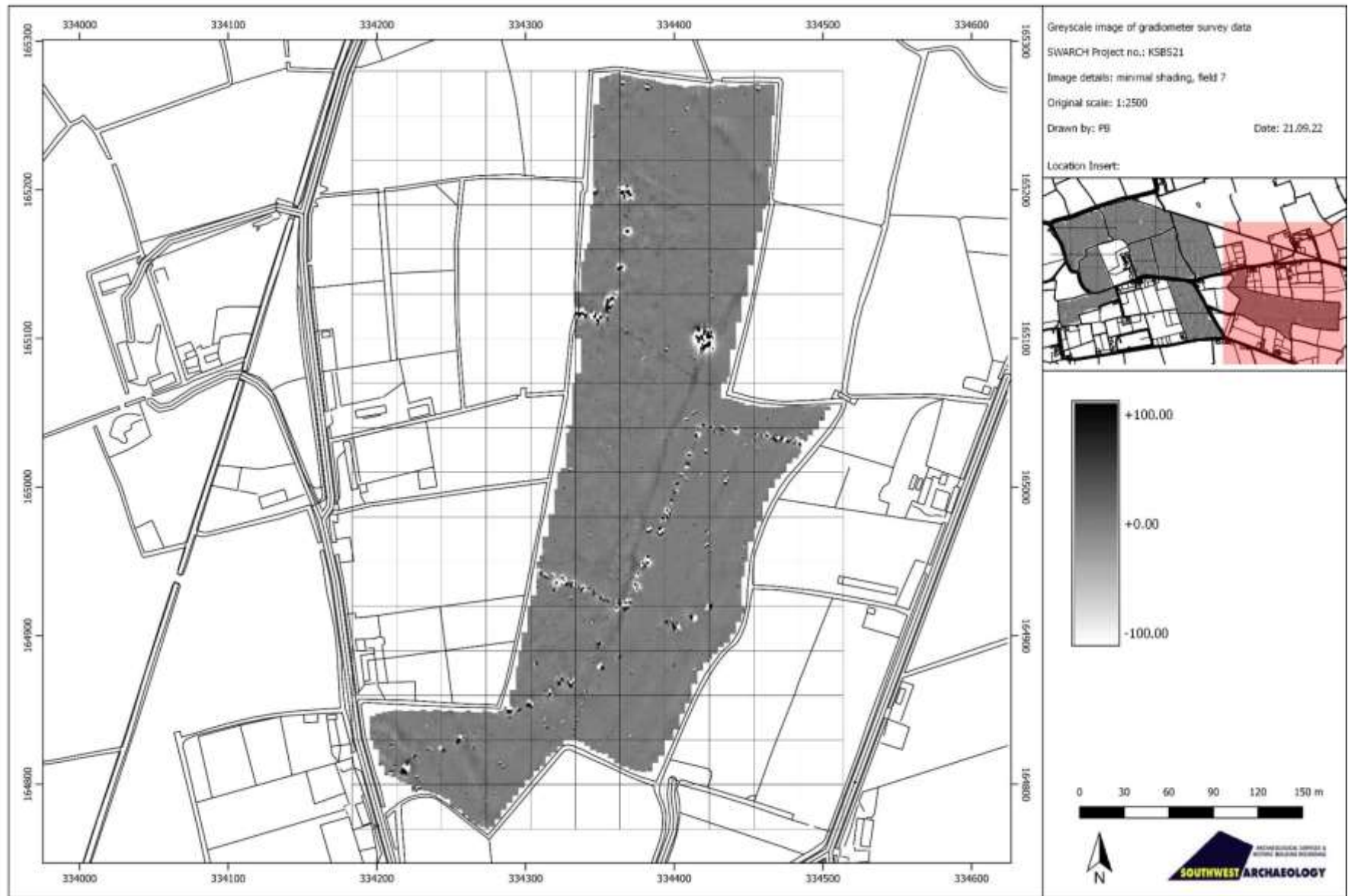
APPENDIX 1: ADDITIONAL IMAGES OF THE GEOPHYSICAL SURVEY



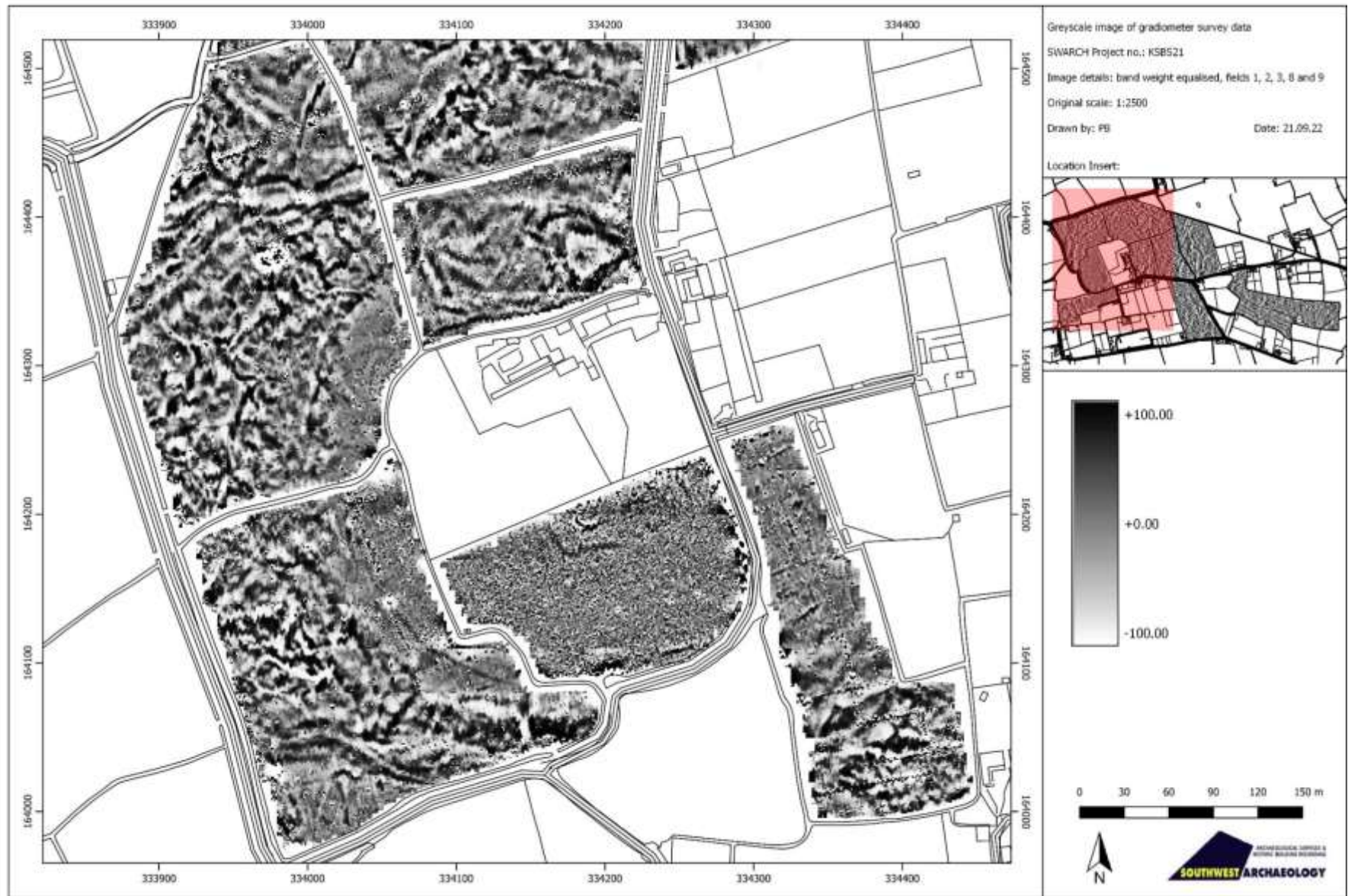
SANDBAY SOLAR, KEWSTOKE, NORTH SOMERSET: RESULTS OF A HERITAGE ASSESSMENT



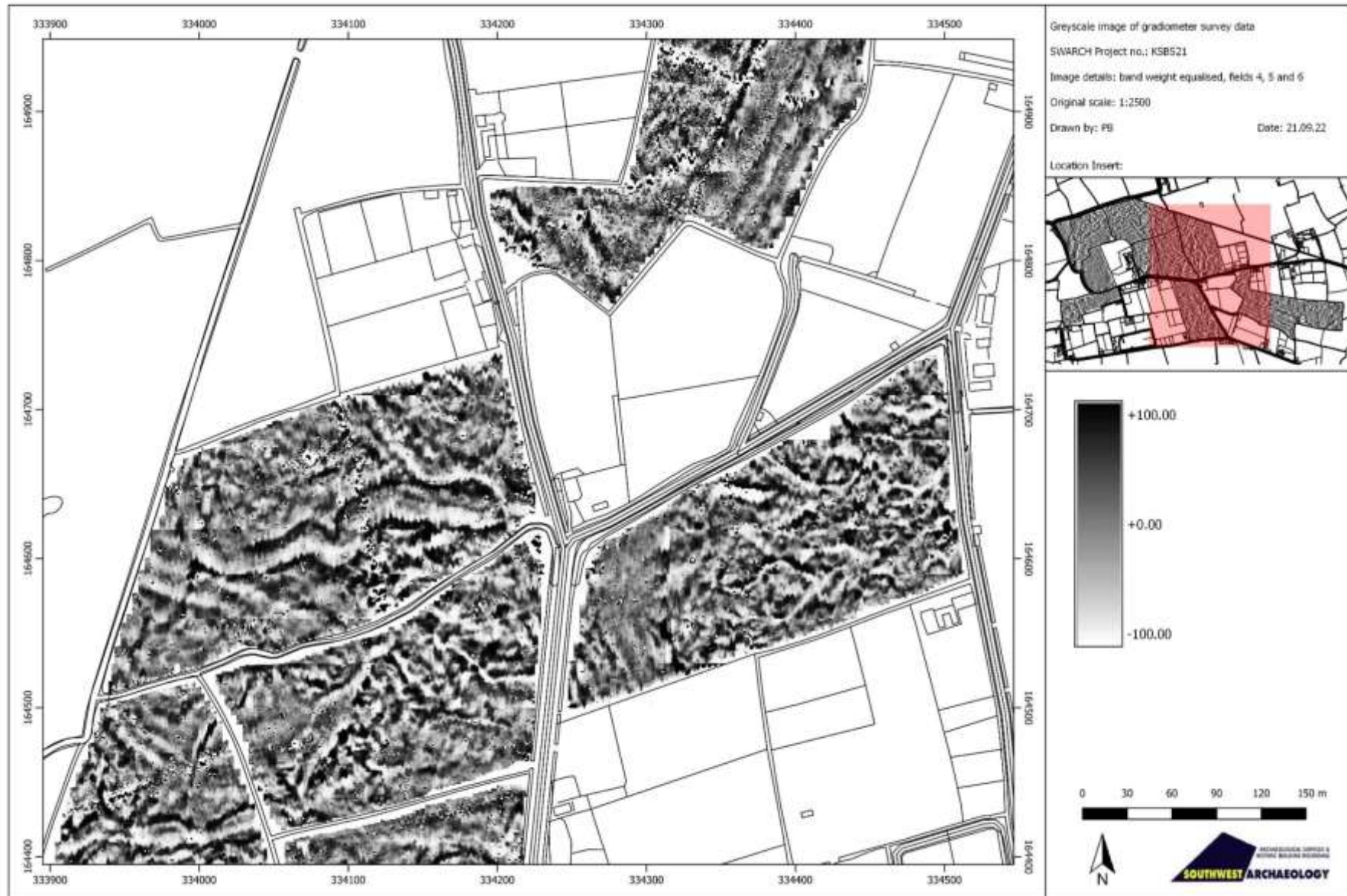
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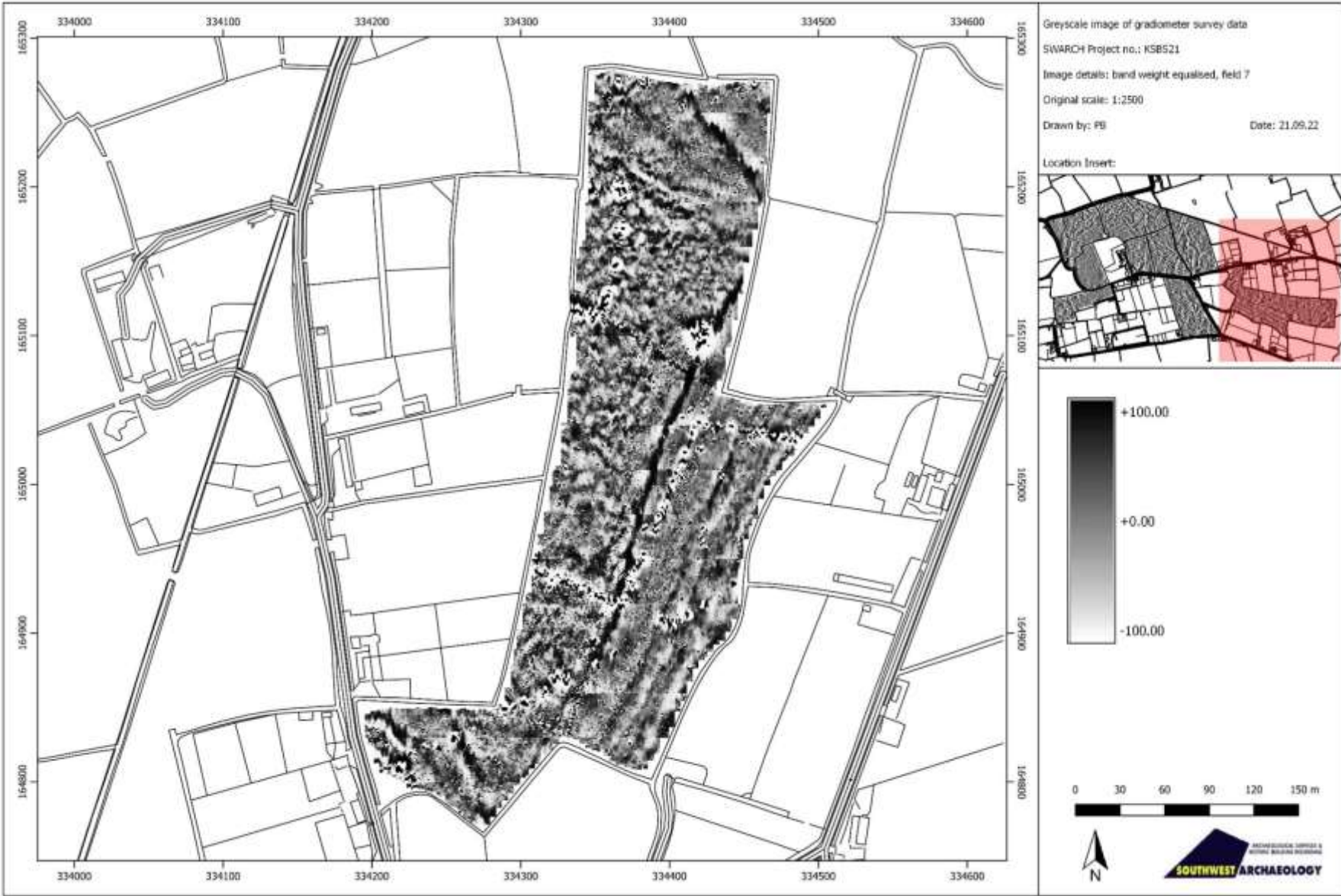
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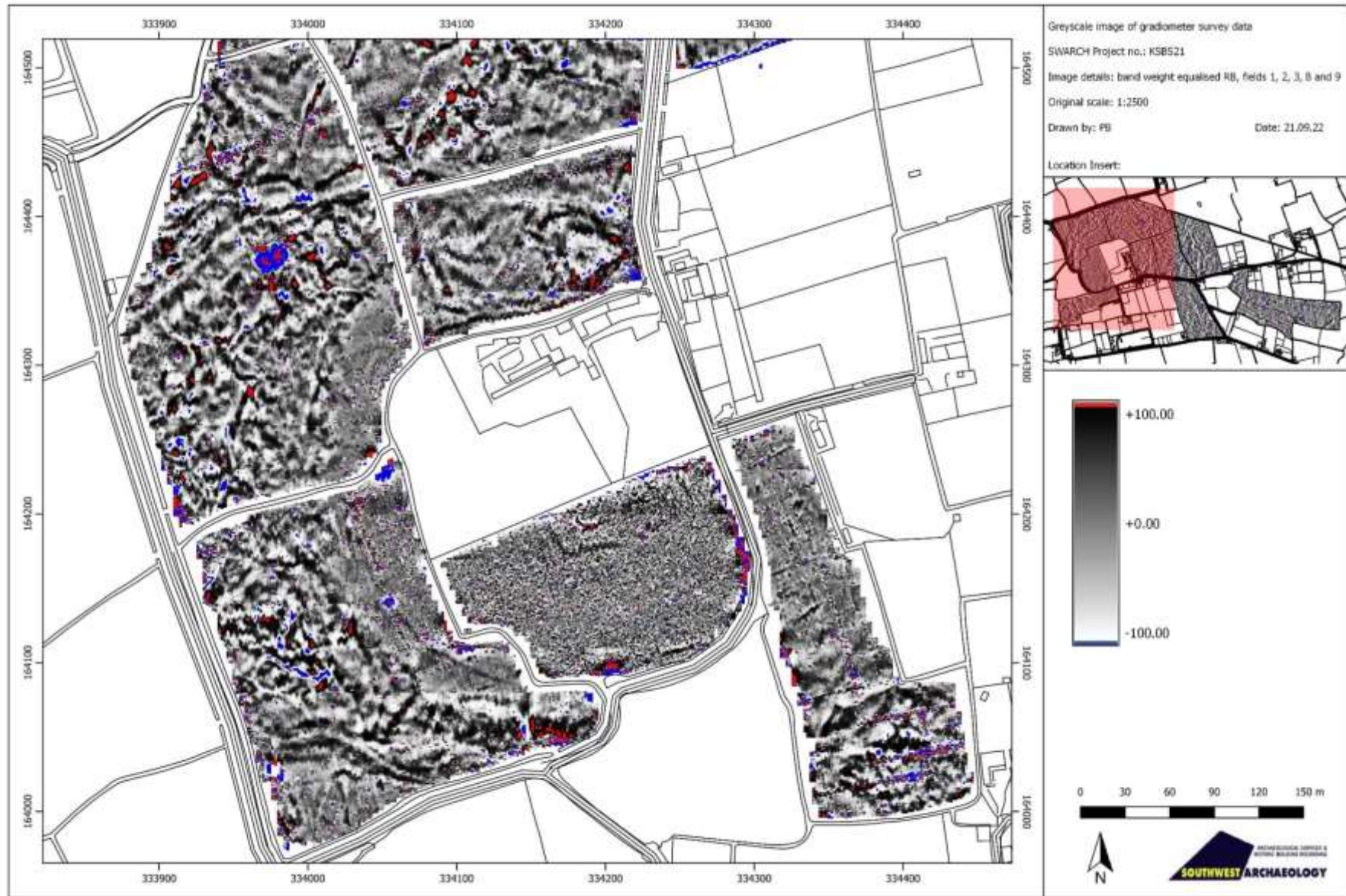
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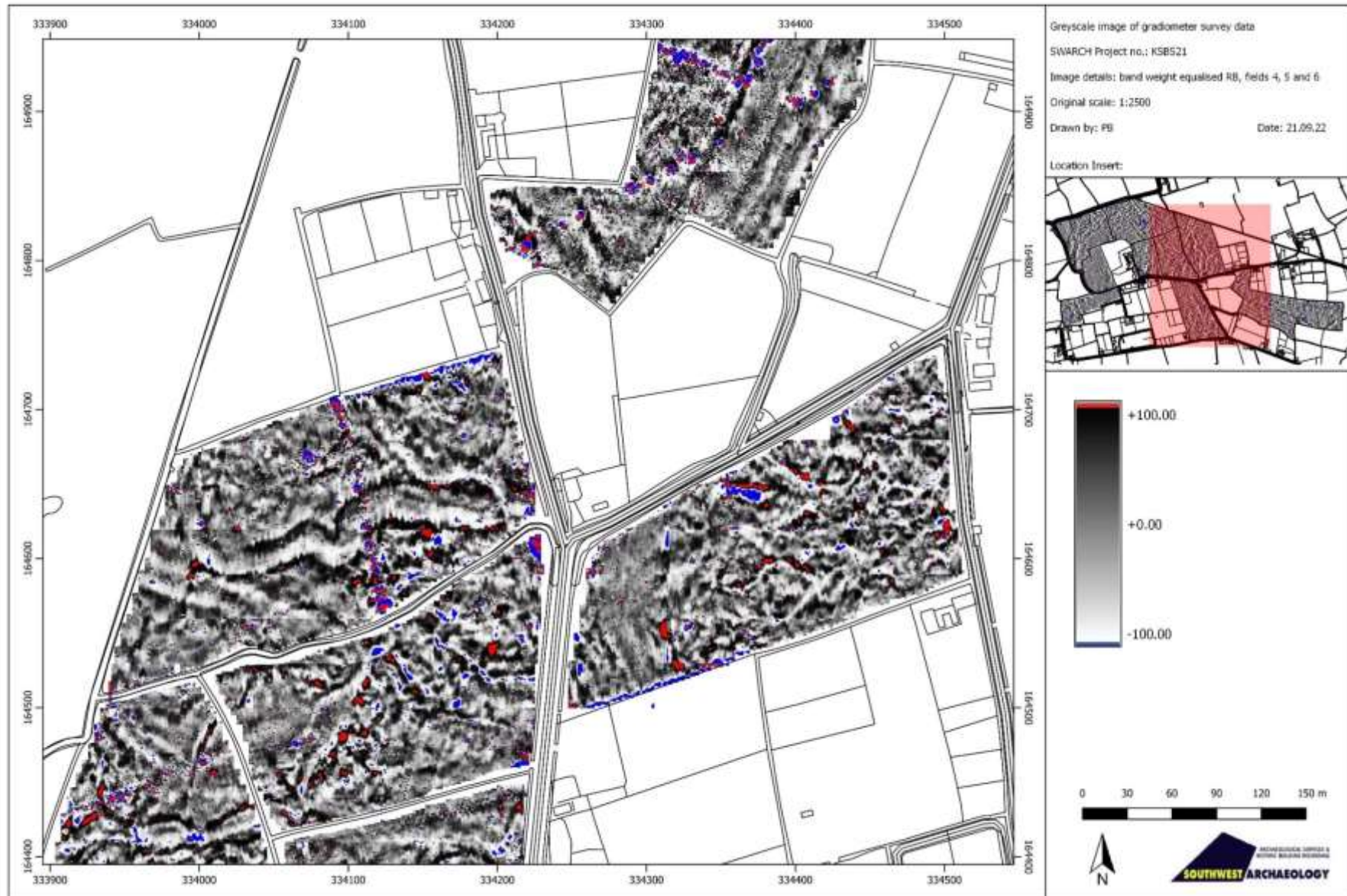
SANDBAY SOLAR, KEWSTOKE, NORTH SOMERSET: RESULTS OF A HERITAGE ASSESSMENT



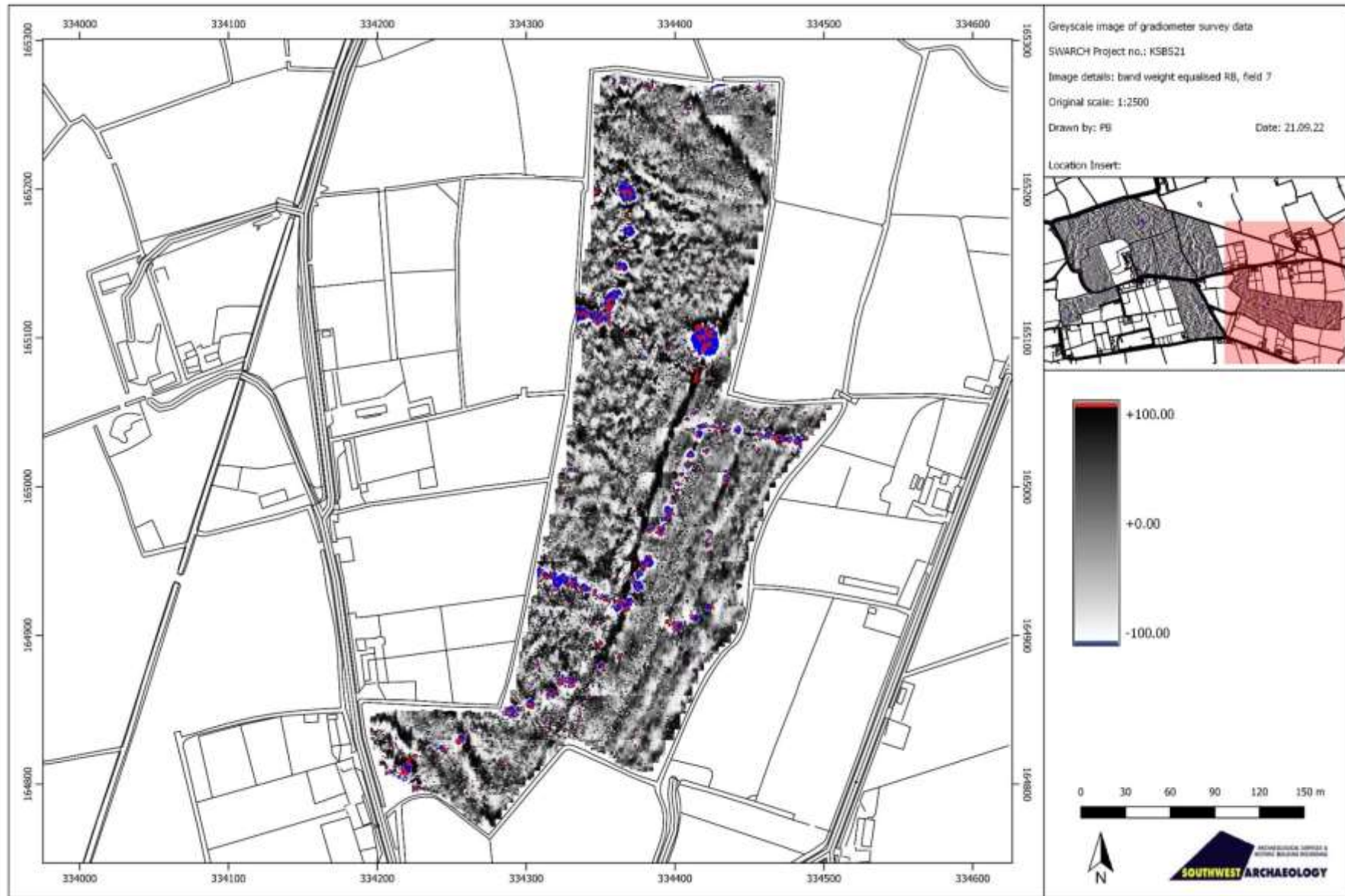
SANDBAY SOLAR, KEWSTOKE, NORTH SOMERSET: RESULTS OF A HERITAGE ASSESSMENT



SANDBAY SOLAR, KEWSTOKE, NORTH SOMERSET: RESULTS OF A HERITAGE ASSESSMENT



SANDBAY SOLAR, KEWSTOKE, NORTH SOMERSET: RESULTS OF A HERITAGE ASSESSMENT



APPENDIX 2: SITE PHOTOGRAPHS



1. FIELD F1. FROM THE NORTH-EAST CORNER. VIEWED FROM THE NORTH-EAST, LOOKING SOUTH-WEST.



2. FIELD F1. FROM THE SOUTH-WEST CORNER. VIEWED FROM THE SOUTH, LOOKING NORTH.



3. FIELD F1. FROM THE SOUTH-WEST CORNER. VIEWED FROM THE SOUTH-WEST, LOOKING NORTH-EAST.



4. FIELD F2. FROM THE NORTH-EAST CORNER. VIEWED FROM THE NORTH, LOOKING SOUTH.



5. FIELD F2. FROM THE NORTH-EAST CORNER. VIEWED FROM THE NORTH-EAST, LOOKING SOUTH-WEST.



6. FIELD F2. FROM THE NORTH-WEST CORNER. VIEWED FROM THE NNE, LOOKING SSW.



7. FIELD F3. FROM THE SOUTH-EAST CORNER. VIEWED FROM THE EAST, LOOKING WEST.



8. FIELD F3. FROM THE SOUTH-EAST CORNER. VIEWED FROM THE SSW, LOOKING NNW.



9. FIELD F3. FROM THE SOUTH-WEST CORNER. VIEWED FROM THE SOUTH-WEST, LOOKING NORTH-EAST.



10. FIELD F4. FROM THE SOUTH-EAST CORNER. VIEWED FROM THE ENE, LOOKING WSW.



11. FIELD F4. FROM THE SOUTH-EAST CORNER. VIEWED FROM THE SSE, LOOKING NNW.



12. FIELD F4. FROM THE SOUTH-WEST CORNER. VIEWED FROM THE SSW, LOOKING NNE.



13. FIELD F4. FROM THE SOUTH-WEST CORNER. VIEWED FROM THE WSW, LOOKING ENE.



14. FIELD F5. FROM THE SOUTH-WEST CORNER. VIEWED FROM THE SOUTH-WEST, LOOKING NORTH-EAST.



15. FIELD F5. FROM THE SOUTH-WEST CORNER. VIEWED FROM THE WSW, LOOKING ENE.



16. FIELD F5. FROM THE NORTH-EAST CORNER. VIEWED FROM THE NNW, SSE.



17. FIELD F6. FROM THE SOUTH-EAST CORNER. VIEWED FROM THE EAST, LOOKING WEST.



18. FIELD F6. FROM THE SOUTH-WEST CORNER. VIEWED FROM THE WSW, LOOKING ENE.



19. FIELD F7. FROM THE SOUTH END. VIEWED FROM THE SOUTH-WEST, LOOKING NORTH-EAST.



20. FIELD F7. FROM THE CORNER IN THE WESTERN BOUNDARY. VIEWED FROM THE SOUTH-WEST, LOOKING NORTH-WEST.



21. FIELD F7. FROM THE MIDDLE OF THE WESTERN BOUNDARY. VIEWED FROM THE NORTH-WEST, LOOKING SOUTH-EAST.



22. FIELD F7. FROM THE MIDDLE OF THE WESTERN BOUNDARY. VIEWED FROM THE SOUTH, LOOKING NORTH.



23. FIELD F7. FROM THE MIDDLE OF THE WESTERN BOUNDARY. VIEWED FROM THE WSW, LOOKING ENE.



24. FIELD F8. FROM THE MIDDLE OF SOUTHERN BOUNDARY. VIEWED FROM THE SOUTH-EAST, LOOKING NORTH-WEST.



25. FIELD F8. FROM THE MIDDLE OF SOUTHERN BOUNDARY. VIEWED FROM THE SOUTH-WEST, LOOKING NORTH-EAST.



26. FIELD F9. FROM THE NORTH-EAST CORNER. VIEWED FROM THE NNW, LOOKING SSE.



27. FIELD F9. FROM THE NORTH-EAST CORNER. VIEWED FROM THE NORTH-EAST, LOOKING SOUTH-WEST.



28. FIELD F9. FROM THE MIDDLE OF THE WESTERN BOUNDARY. VIEWED FROM THE SOUTH, LOOKING NORTH.



29. FIELD F9. FROM THE MIDDLE OF THE WESTERN BOUNDARY. VIEWED FROM THE NORTH-WEST, LOOKING SOUTH-EAST.

APPENDIX 3: HIA PHOTOGRAPHS



1. ST PAULS' CHURCH, KEWSTOKE; VIEWED FROM THE SOUTH, LOOKING NORTH.



2. THE OWL'S COTTAGE CAFÉ AND ADJACENT OWL'S CREST HOUSE; VIEWED FROM THE EAST, LOOKING WEST.



3. THE GI WOODSPRING PRIORY (LEFT) AND INFIRMARY (LEFT); VIEWED FROM THE NORTH, LOOKING SOUTH.



4. THE GI INFIRMARY; VIEWED FROM THE NORTH-EAST, LOOKING SOUTH-WEST.



5. THE INFIRMARY; VIEWED FROM THE SOUTH-EAST, LOOKING NORTH-WEST.



6. THE PRIORY AND GI CHAPTERHOUSE WEST WALL; VIEWED FROM THE EAST, LOOKING WEST.



7. THE PRIORY COMPLEX; VIEWED FROM THE SOUTH, LOOKING NORTH.



8. THE VIEW ACROSS THE LEVEL TOWARDS KEWSTOKE FROM THE LANE TO THE SOUTH OF THE PRIORY; VIEWED FROM THE NORTH-EAST, LOOKING SOUTH-WEST.



9. VIEW BACK TO THE PRIORY FROM THE RAISED 'ISLAND' AT COLLUM TO THE SOUTH; VIEWED FROM THE SSE, LOOKING NNW.

APPENDIX 4: IMPACT ASSESSMENT METHODOLOGY

Heritage Impact Assessment - Overview

The purpose of heritage impact assessment is twofold: Firstly, to understand – insofar as is reasonably practicable and in proportion to the importance of the asset – the significance of a historic building, complex, area or archaeological monument (the ‘heritage asset’). Secondly, to assess the likely effect of a proposed development on the heritage asset (direct impact) and/or its setting (indirect impact). The methodology employed in this assessment is based on the approaches advocated in *Managing Significance in Decision-Taking in the Historic Environment* [GPA2 Historic England 2015] and *The Setting of Heritage Assets 2ND Edition* [GPA3 Historic England 2017], used in conjunction with the ICOMOS [2011] and National highways [DMRB LA 104 2020] guidance. This Appendix contains details of the statutory background and staged methodology used in this report.

National Policy

General policy and guidance for the conservation of the historic environment are now contained within the *National Planning Policy Framework* (Department for Communities and Local Government 2012 revised 2021)¹. The relevant guidance is reproduced below:

Paragraph 194

In determining applications, local planning authorities should require the applicant to describe the significance of any heritage assets affected, including the 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 be consulted, and the heritage assets assessed using appropriate expertise where necessary. Where a site on which a 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.

Paragraph 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 assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.

A further key document is the Planning (Listed Buildings and Conservation Areas) Act 1990², in particular section 66(1), which provides *statutory protection* to the setting of Listed buildings:

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.

In addition, the Ancient Monuments and Archaeological Areas Act 1979³, the Protection of Wrecks Act 1973⁴, and the Historic Buildings and Ancient Monuments Act 1953⁵ also contain relevant statutory provisions.

Unitary councils, county councils, and district councils usually have local policies and plans, based on national guidelines, that serve to guide local priorities.

Development within a Historic Environment

Any development within a historic environment has the potential for both *direct* and *indirect* impacts. Direct impacts can be characterised as the physical effect the development may have on heritage assets within, or immediately adjacent to, the redline boundary. These impacts are almost always adverse, i.e. they represent the disturbance or destruction of archaeological features and deposits within the footprint of the Scheme. Indirect impacts can be characterised as the way the development affects the visual, aural, and experiential qualities (i.e. setting) of a

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf.

² <https://www.legislation.gov.uk/ukpga/1990/9/contents>.

³ <https://www.legislation.gov.uk/ukpga/1979/46/contents>.

⁴ <https://www.legislation.gov.uk/ukpga/1973/33/contents>.

⁵ <https://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents>.

designated heritage asset in the wider area, where the significance of that asset is at least partly derived from those qualities. These impacts can be adverse, beneficial, or neutral.

The *designated heritage assets* (see below) potentially impacted by a development are, by definition, a known quantity and, to a greater or lesser extent, their significance is appreciated and understood. In general, undesignated heritage assets of comparable value to designated assets are also readily identifiable. Nonetheless, understanding of the value and significance of the designated heritage assets must be achieved via a staged process identification and assessment in line with the relevant guidance.

In contrast, unknown archaeological assets are, by definition, unidentified, unquantified and their significance is not understood. Clear understanding of the value and significance of the archaeology must therefore be achieved via a staged process of documentary and archaeological investigation in line with the relevant guidance.

Significance in Decision-Making

It is the determination of *significance* that is critical to assessing level of impact, whether the effect is determined to be beneficial or adverse. The PPG states: *Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent, and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals*⁶.

The relevant Historic England guidance is *Managing Significance in Decision-Taking in the Historic Environment*⁷. The following is a staged process for decision-taking, largely based on that document.

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

In general, impact assessment addresses Steps 1-3 and 7, but may include Steps 4-6 where the required information is available from the developer/client/agent, and where design is an iterative process rather than *fait accompli*.

For designated heritage assets, which have been designated *because* they are deemed significant, Step 1 is relatively straightforward, and Step 2 is also, to a degree quantified, as the determination of significance, to a greater or lesser extent, took place then the heritage asset was designated⁸. For undesignated heritage of assets comparable value, or for archaeological sites that may have not been investigated (or were unknown or poorly understood prior to identification), a staged process of assessment is required (below).

Once an assessment of value and significance has been made, either by reference to designation or comparable importance if undesignated, the significance of the effect (TABLE 133) and magnitude of the impact (TABLE 14) can be determined. The former is logical and objective, the latter is a more nuanced but subjective, and the accompanying discussion provides the more narrative but subjective approach advocated by Historic England. This is a useful balance between rigid logic and nebulous subjectivity (e.g. the significance of effect on a Grade II Listed building can never be greater than moderate/large; an impact of substantial adverse is almost never achieved). This is in adherence with GPA3⁹.

In the NPPF, adverse impact is divided into the categories: *total loss*, *substantial harm*, and *less than substantial harm*. The bar for substantial harm was set at a very high level in 2013 by the case *Bedford BC v SSCLG38*. However,

⁶ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>. Paragraph 007.

⁷ Historic England 2015: *Managing Significance in Decision-Taking in the Historic Environment Good Practice Advice in Planning Note 2*. Paragraph 6.

⁸ With the caveat that Listed building descriptions vary in quality between authorities, and interiors may not have been inspected.

⁹ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 19.

following a recent High Court action¹⁰ it is possible a *major adverse impact* may now qualify as a *substantial harm*. Any lesser adverse impact will constitute a *less than substantial harm*. TABLE 155 shows how this report correlates the two systems.

It is important to state that, whereas the assessment of direct effects to archaeological sites (where the identified heritage asset falls within the footprint of the development and thus is very likely to be damaged or destroyed) is relatively straightforward, the assessment of indirect effects (where the effect is communicated by the impact on the *setting* of a heritage asset) is more nebulous and harder to convincingly predict.

In this context it is useful to remember that *setting is not itself a heritage asset, nor a heritage designation... its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance*¹¹. Thus it is not simply the contribution to significance that is important, but also how a setting facilitates or hinders an appreciation of the significance of a heritage asset. *The contribution of setting to the significance of a heritage asset is often expressed by reference to views*¹², *but ...setting is different to general amenity. Views out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting*¹³. Thus it is possible for views between and across heritage assets and a development to exist without there necessarily being an effect.

In addition, and as PPG states¹⁴: *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 concept of setting is explored in more detail below (see *Definitions*).

Value and Importance

While every heritage asset, designated or otherwise, has some intrinsic merit, the act of designation creates a hierarchy of importance that is reflected by the weight afforded to their preservation and enhancement within the planning system. The system is far from perfect, impaired by an imperfect understanding of individual heritage assets, but the value system that has evolved does provide a useful guide to the *relative* importance of heritage assets. Provision is also made for heritage assets where value is not recognised through designation (e.g. undesignated 'monuments of Schedulable quality and importance' should be regarded as being of *high* value); equally, there are designated monuments and structures of *low* relative merit. TABLE 11: THE HIERARCHY OF VALUE/IMPORTANCE (BASED ON THE DMRB LA104 2020 TABLE 3.2N). TABLE 11 is taken from the current DMRB; TABLE 122 refers back to the 2011 DRMB which more usefully defines value in relation to designation.

TABLE 11: THE HIERARCHY OF VALUE/IMPORTANCE (BASED ON THE DMRB LA104 2020 TABLE 3.2N).

Value (Sensitivity) of Receptor / Resource	Typical description
Very High	Very high importance and rarity, international scale and very limited potential for substitution
High	High importance and rarity, national scale, and limited potential for substitution.
Medium	Medium or high importance and rarity, regional scale, limited potential for substitution
Low	Low or medium importance and rarity, local scale

¹⁰ UK Holocaust Memorial in Victoria Tower Gardens in Westminster, reference APP/XF990/V/193240661.

¹¹ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 9.

¹² Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 10. The sentiment is also expressed in the PPG glossary.

¹³ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 16.

¹⁴ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>. Paragraph 013.

Negligible	Very low importance and rarity, local scale.
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TABLE 12: THE HIERARCHY OF VALUE/IMPORTANCE (BASED ON THE DMRB VOL.11 TABLES 5.1, 6.1 & 7.1).

Hierarchy of Value/Importance	
Very High	Structures inscribed as of universal importance as World Heritage Sites; Other buildings of recognised international importance; World Heritage Sites (including nominated sites) with archaeological remains; Archaeological assets of acknowledged international importance; Archaeological assets that can contribute significantly to international research objectives; World Heritage Sites inscribed for their historic landscape qualities; Historic landscapes of international value, whether designated or not; Extremely well-preserved historic landscapes with exceptional coherence, time-depth, or other critical factor(s).
High	Scheduled Monuments with standing remains; Grade I and Grade II* (Scotland: Category A) Listed Buildings; Other Listed buildings that can be shown to have exceptional qualities in their fabric or historical associations not adequately reflected in the Listing grade; Conservation Areas containing very important buildings; Undesignated structures of clear national importance; Undesignated assets of Schedulable quality and importance; Assets that can contribute significantly to national research objectives. Designated historic landscapes of outstanding interest; Undesignated landscapes of outstanding interest; Undesignated landscapes of high quality and importance, demonstrable national value; Well-preserved historic landscapes, exhibiting considerable coherence, time-depth or other critical factor(s).
Medium	Grade II (Scotland: Category B) Listed Buildings; Historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical associations; Conservation Areas containing buildings that contribute significantly to its historic character; Historic Townscape or built-up areas with important historic integrity in their buildings, or built settings (e.g. including street furniture and other structures); Designated or undesignated archaeological assets that contribute to regional research objectives; Designated special historic landscapes; Undesignated historic landscapes that would justify special historic landscape designation, landscapes of regional value; Averagely well-preserved historic landscapes with reasonable coherence, time-depth or other critical factor(s).
Low	Locally Listed buildings (Scotland Category C(S) Listed Buildings); Historic (unlisted) buildings of modest quality in their fabric or historical association; Historic Townscape or built-up areas of limited historic integrity in their buildings, or built settings (e.g. including street furniture and other structures); Designated and undesignated archaeological assets of local importance; Archaeological assets compromised by poor preservation and/or poor survival of contextual associations; Archaeological assets of limited value, but with potential to contribute to local research objectives; Robust undesignated historic landscapes; Historic landscapes with importance to local interest groups; Historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations.
Negligible	Buildings of no architectural or historical note; buildings of an intrusive character; Assets with very little or no surviving archaeological interest; Landscapes with little or no significant historical interest.
Unknown	Buildings with some hidden (i.e. inaccessible) potential for historic significance; The importance of the archaeological resource has not been ascertained.

TABLE 133: SIGNIFICANCE OF EFFECTS MATRIX (BASED ON DRMB LA 104 2020; ICOMOS 2011, 9-10).

	Value of Heritage Asset	Scale and Severity of Change/Impact				
		No Change	Negligible Change	Minor Change	Moderate Change	Major Change
		Significance of Effect or Overall Impact (either adverse or beneficial)				
Environmental Value (Sensitivity)	WHS sites that convey OUV	Neutral	Slight	Moderate/Large	Large/Very Large	Very Large
	Very High	Neutral	Slight	Moderate/Large	Large/Very Large	Very Large
	High	Neutral	Slight	Moderate/Slight	Moderate/Large	Large/Very Large
	Medium	Neutral	Neutral/Slight	Slight	Moderate	Moderate/Large
	Low	Neutral	Neutral/Slight	Neutral/Slight	Slight	Slight/Moderate
	Negligible	Neutral	Neutral	Neutral/Slight	Neutral/Slight	Slight

TABLE 144: MAGNITUDE OF IMPACT (BASED ON DMRB LA 104 2020 TABLE 3.4N).

Magnitude of Impact (Change)		Typical Description
Major	Adverse	Loss of resource and/or quality and integrity of resource; severe damage to key characteristics, features, or elements.
	Beneficial	Large scale or major improvement of resource quality; extensive restoration; major improvement of attribute quality.
Moderate	Adverse	Loss of resource, but not adversely affecting the integrity; partial loss of/damage to key characteristics, features or elements.
	Beneficial	Benefit to, or addition of, key characteristics, features, or elements; improvement of attribute quality.
Minor	Adverse	Some measurable change in attributes, quality, or vulnerability; minor loss of, or alteration to, one (maybe more) key characteristics, features, or elements.
	Beneficial	Minor benefit to, or addition of, one (maybe more) key characteristics, features, or elements; some beneficial impact on attribute or a reduced risk of negative impact occurring.
Negligible	Adverse	Very minor loss or detrimental alteration to one or more characteristics, features, or elements.
	Beneficial	Very minor benefit to or positive addition of one or more characteristics, features, or elements.
No change		No loss or alteration of characteristics, features, or elements; no observable impact in either direction.

TABLE 155: SCALES OF IMPACT AS PER THE NPPF, RELATED TO TABLE 144.

Scale of Impact		
No Change	<i>Neutral</i>	No impact on the heritage asset.
Less than Substantial Harm	<i>Negligible Adverse</i>	Where the developments may be visible or audible but would not affect the heritage asset or its setting, due to the nature of the asset, distance, topography, or local blocking.
	<i>Minor Adverse</i>	Where the development would have an effect on the heritage asset or its setting, but that effect is restricted due to the nature of the asset, distance, or screening from other buildings or vegetation.
	<i>Moderate Adverse</i>	Where the development would have a pronounced impact on the heritage asset or its setting, due to the sensitivity of the asset and/or proximity. The effect may be ameliorated by screening or mitigation.
Substantial Harm	<i>Substantial Adverse</i>	Where the development would have a severe and unavoidable effect on the heritage asset or its setting, due to the particular sensitivity of the asset and/or close physical proximity. Screening or mitigation could not ameliorate the effect of the development in these instances.
Total Loss	<i>Total Loss</i>	The heritage asset is destroyed.

Staged Investigation – Direct Impact

The staged approach for the assessment of direct impacts references the publication *Significance in Decision-Taking in the Historic Environment*¹⁵. The aim of this assessment is to establish the *archaeological baseline* for the site and determine the likely significance of the archaeological resource. This staged approach starts with desk-based assessment¹⁶, may conclude with intrusive investigations, and may reference some or all of the following:

1. Documentary research (published works, primary and secondary sources in record offices).
2. Existing archaeological reports or surveys for the site.
3. Historic maps.
4. Archaeological research (historic environment records (HER), event records (HER), Historic England National List; Portable Antiquity Scheme (PLS) records, grey literature reports (available from the Archaeological Data Service).
5. Historic Landscape Characterisation (HLC).
6. Aerial photography (National Mapping Programme, historic aerial photographs (Historic England, Cambridge, Britain from Above), recent commercial photography (Google Earth)).
7. LiDAR analysis (Environment Agency data, TELLUS data).
8. Oral testimony.
9. Walkover survey (or for historic buildings, a historic building appraisal¹⁷).
10. Geophysical survey, if suitable (magnetometry, electrical resistance, ground-penetrating radar)¹⁸.

¹⁵ Historic England 2015: Managing Significance in Decision-Taking in the Historic Environment: *Historic Environment Good Practice Advice in Planning Note 2*.

¹⁶ CIfA 2014 updated 2020: *Standard and guidance for historic environment desk-based assessment*.

¹⁷ Historic England 2016: *Understanding Historic Buildings: A Guide to Good Recording Practice*.

¹⁸ CIfA 2014 updated 2020: *Standard and guidance for archaeological geophysical survey*. Schmidt, A., Linford, P. Linford, N. David, A. Gaffney, C., Sarris, A. & Fassbinder, J. 2016: *EAC Guidelines for the Use of Geophysics in Archaeology*.

11. Archaeological trench evaluation¹⁹, if appropriate.

Following the conclusion of this staged process, an assessment of the archaeological potential of the site is produced and (if appropriate) recommendations made, including for further investigation, analysis, and publication to be undertaken, as mitigation for the proposed development. This document will normally only cover Items 1-10.

Type of Impact

Developments can readily be divided into several phases which are marked by different types and level of impact. However, the only one relevant to direct impact is the *construction phase*. Construction works have direct, physical effects on the buried archaeology of a site. Direct effects may extend beyond the nominal footprint of a site e.g. where related works or site compounds are located off-site. *Operational* and *decommissioning* phases are only relevant where elements of the buried archaeological resource survive, but in most instances (excluding PV sites and wind turbines), these impacts are permanent and irreversible.

Staged Investigation – Indirect Impact

The staged approach for the assessment of indirect impacts references the *Setting of Heritage Assets*²⁰. The aim of this assessment is to identify the designated heritage assets outside the redline boundary that might be impacted upon by the proposed development, determine if an effect on their significance via setting is possible, and establish the level of impact. The staged approach advocated by GPA3 contains the following steps²¹:

1. Identify which heritage assets and their settings are affected.
2. Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.
3. Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it.
4. Explore ways to maximise enhancement and avoid or minimise harm.
5. Make and document the decision and monitor outcomes.

Step one is to identify the designated heritage assets that might be affected by the development. The first stage of that process is to determine an appropriate search radius, and this would vary according to the height, size and/or prominence of the proposed development. For instance, the search radius for a wind turbine, as determined by its height and dynamic character, would be much larger than for a single house plot or small agricultural building. For this assessment, the second part of the process is to examine the heritage assets within the search radius and assign them to one of three categories:

- Category #1 assets: Where proximity to the proposed development, the significance of the heritage asset concerned, or the likely magnitude of impact, demands detailed consideration.
- Category #2 assets: Assets where location and current setting would indicate that the impact of the proposed development is likely to be limited, but some uncertainty remains.
- Category #3 assets: Assets where location, current setting, significance would strongly indicate the impact would be no higher than negligible and detailed consideration both unnecessary and disproportionate. These assets are scoped out of the assessment but may still be listed in the impact summary table.

Dependant on the nature of the development, this work may be informed, but not governed, by a generated ZTV (zone of theoretical visibility).

Pursuant to *Steps Two and Three*, a series of site visits are made to the designated heritage assets of Categories #1 and #2. Each asset is considered separately and appraised on its significance, condition, and setting/context by the assessor. The potential impacts the development are assessed for each location, taking into account site-specific factors and the limitations of that assessment (e.g. no access, viewed from the public road etc.). Photographic and written records are compiled during these visits. If a ZTV has been used in the assessment, the accuracy of the ZTV is corroborated with reference to field observations.

Step 4 is possible where the required information is available from the developer/client/agent, and where design is an iterative process rather than *fait accompli*. In many instances, adverse outcomes (and more rarely, beneficial outcomes) are unavoidable, as mitigation would have to take place at the heritage asset concerned or within an

¹⁹ ClFA 2014 updated 2020: *Standard and guidance for archaeological field evaluation*.

²⁰ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 9.

²¹ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 9.

intervening space, and not the proposed site itself.

Assessment and documentation, *Step 5*, takes place within this document. The individual asset tables are completed for each assessed designated heritage asset, and, with an emphasis on practicality and proportionality,²² assets are grouped by category (e.g. churches, historic settlements, funerary remains etc.) and provided with a generic preamble that avoids repetitious narrative. This initial preamble establishes the baseline sensitivity of a given category of monument or building to the potential effect; the individual entries that follow then elaborate on local circumstance and site-specific factors. The individual assessments are to be read in conjunction with the overall discussion, as the assessment of impact is reflection of both.

As discussed (elsewhere, this document), the critical assessment is to determine the contribution of setting to the significance of the heritage asset, and/or the ability of the setting to facilitate an appreciation of that significance. Views are important but not paramount, and views to and from a proposed development can exist without adverse effect. Some assets are intrinsically more sensitive to change in their environment than others; a useful shorthand for this can be found in TABLE 16.

TABLE 16: IMPORTANCE OF SETTING TO INTRINSIC SIGNIFICANCE.

Importance of Setting to the Significance of the Asset	
Paramount	Examples: Round barrow; follies, eye-catchers, stone circles
Integral	Examples: Hillfort; country houses
Important	Examples: Prominent church towers; war memorials
Incidental	Examples: Thatched cottages
Irrelevant	Examples: Milestones

The Setting of Buried or Conceptual Assets

Some heritage assets have no remaining surface expression and survive *only* as buried archaeological features. Some Scheduled Monuments were designated on the basis of significant cropmarks or else were mapped by the Ordnance Survey in the 19th century and have been ploughed flat. Registered Battlefields may not even have an archaeological expression, and function as conceptual assets.

GPA3 states²³: *Heritage Assets that comprise only buried remains may not be readily appreciated by a casual observer. They nonetheless retain a presence in the landscape and, like other heritage assets, may have a setting.*

These points apply equally, in some rare, to designated heritage assets such as Scheduled Monuments or Protected Wreck Sites that are periodically, partly, or wholly submerged, e.g. in the intertidal zone on the foreshore. The location and setting of historic battles, otherwise with no visible traces, may include important strategic views, routes by which opposing forces approached each other and a topography and landscape features that played a part in the outcome.

In general, without strong historical associations (e.g. battlefields) it is difficult to assess the likely impact of a proposed development on a buried heritage asset. If meaning can be derived from an appreciation of landscape context – e.g. an elevated location for a lost hillfort or barrow – then a consideration of setting, and the ability of setting to better reveal the significance of a site, remains relevant. Where that is not possible, the significance of physical setting is much diminished.

Type of Impact

Developments can readily be divided into several phases which are marked by different types and level of impact: the *construction phase*, the *operational phase*, and the *decommissioning phase*. In most instances, impacts are impermanent and reversible, as a turbine can be dismantled, a tower block demolished, or trees may grow up to screen an ugly elevation.

Construction Phase

Construction works have direct, physical effects on the buried archaeology of a site, and a pronounced but indirect effect on neighbouring properties. Direct effects may extend beyond the nominal footprint of a site e.g. where related works or site compounds are located off-site. Indirect effects are both visual and aural, and may also affect

²² Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraphs 2, 17, 19, 21, 23, 41.

²³ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 8.

air quality, water flow and traffic in the local area.

Operational Phase

The operational phase of a development is either temporary (e.g. wind turbine or mobile phone mast) or effectively permanent (housing development or road scheme). The effects at this stage are largely indirect and can be partly mitigated over time through design and/or planting. Large development can have an effect on historic landscape character, as they transform areas from one character type (e.g. agricultural farmland) into another (e.g. suburban).

Decommissioning Phase

Relevant to wind turbines and PV sites, less relevant to other forms of development. These impacts would be similar to those of the construction phase.

Group Assessment

Individual assessments give some indication as to how a development may affect a particular cottage, historic park, or hillfort, but collective assessment are also necessary, reflecting the effect on the historic environment in general.

Cumulative Impact

A single development will have a direct physical and an indirect visual impact, but a second and a third site in the same area will have a synergistic and cumulative impact above and beyond that of a single site. PPG states²⁴: *When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.*

GPA3 states²⁵: *Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it.*

However, the cumulative impact of a proposed development can be difficult to determine, as consideration must be given to consented and pre-determination proposals as well as operational or occupied sites.

Aggregate Impact

A single development will usually affect multiple individual heritage assets. In this assessment, the term *aggregate impact* is used to distinguish this from cumulative impact. In essence, this is the impact on the designated parts of the historic environment as a whole, rather than multiple developments on a single asset.

²⁴ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>. Paragraph 013.

²⁵ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 9.3.

Definitions

Heritage Assets

The NPPF Glossary defines heritage assets as: *A building, monument, site, place, area, or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)*²⁶. This is a fairly broad definition for an expanding range of features, as what is considered of little heritage interest today may – due to location, rarity, design, associations, etc. – be considered of heritage value in the future.

Significance

The NPPF Glossary defines significance as: *The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic, or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting*²⁷.

Conservation Principles

In making an assessment, this report adopts the conservation values (*evidential, historical, aesthetic and communal*) laid out in the English Heritage 2008 publication *Conservation Principles*²⁸. These are used to determine and express the relative importance of a given heritage asset. The definition of those terms is summarised below:

Evidential Value

Evidential value (or research potential) is derived from the potential of a structure or site to provide physical evidence about past human activity and may not be readily recognised or even visible. This is the primary form of data for periods without adequate written documentation. However, it is an assessment of *potential* – known value falls under the umbrella of historical value (below).

Historical Value

Historical value (narrative) is derived from the ways in which past people, events and aspects of life can be connected via a place to the present; it can be illustrative or associative.

Illustrative value is the visible expression of evidential value; it has the power to aid interpretation of the past through making connections with, and providing insights into, past communities and their activities through a shared experience of place. Illustrative value tends to be greater if a place features the first or only surviving example of a particular innovation of design or technology.

Associative value arises from a connection to a notable person, family, event or historical movement. It can intensify understanding by linking the historical past to the physical present, always assuming the place bears any resemblance to its appearance at the time. Associational value can also be derived from known or suspected links with other monuments (e.g. barrow cemeteries, church towers) or cultural affiliations (e.g. Methodism).

Buildings and landscapes can also be associated with literature, art, music or film, and this association can inform and guide responses to those places.

Historical value depends on sound identification and the direct experience of physical remains or landscapes. Authenticity can be strengthened by change, being a living building or landscape, and historical values are harmed only where adaptation obliterates or conceals them. The appropriate use of a place – e.g. a working mill, or a church for worship – illustrates the relationship between design and function and may make a major contribution to historical value. Conversely, cessation of that activity – e.g. conversion of farm buildings to holiday homes – may essentially destroy it.

Aesthetic Value

Aesthetic value (emotion) is derived from the way in which people draw sensory and intellectual stimulation from a place or landscape. Value can be the result of *conscious design*, or the *fortuitous outcome* of landscape evolution; many places combine both aspects, often enhanced by the passage of time.

Design value relates primarily to the aesthetic qualities generated by the conscious design of a building, structure,

²⁶ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>.

²⁷ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>.

²⁸ English Heritage 2008: *Conservation Principles: policies and guidance for the sustainable management of the historic environment*.

or landscape; it incorporates composition, materials, philosophy, and the role of patronage. It may have associational value, if undertaken by a known architect or landscape gardener, and its importance is enhanced if it is seen as innovative, influential or a good surviving example. Landscape parks, country houses and model farms all have design value. The landscape is not static, and a designed feature can develop and mature, resulting in the 'patina of age'.

Some aesthetic value developed fortuitously over time as the result of a succession of responses within a particular cultural framework e.g. the seemingly organic form of an urban or rural landscape or the relationship of vernacular buildings and their materials to the landscape. Aesthetic values are where a proposed development usually has their most pronounced impact: the indirect effects of most developments are predominantly visual or aural and can extend many kilometres from the site itself. In many instances the impact of a development is incongruous, but that is itself an aesthetic response, conditioned by prevailing cultural attitudes to what the historic landscape should look like.

Communal Value

Communal value (togetherness) is derived from the meaning a place holds for people and may be closely bound up with historical/associative and aesthetic values; it can be commemorative, symbolic, social, or spiritual.

Commemorative and symbolic value reflects the meanings of a place to those who draw part of their identity from it, or who have emotional links to it e.g. war memorials. Some buildings or places (e.g. the Palace of Westminster) can symbolise wider values. Other places (e.g. Porton Down Chemical Testing Facility) have negative or uncomfortable associations that nonetheless have meaning and significance to some and should not be forgotten. Social value need not have any relationship to surviving fabric, as it is the continuity of function that is important. Spiritual value is attached to places and can arise from the beliefs of a particular religion or past or contemporary perceptions of the spirit of place. Spiritual value can be ascribed to places sanctified by hundreds of years of veneration or worship, or wild places with few signs of modern life. Value is dependent on the perceived survival of historic fabric or character and can be very sensitive to change. The key aspect of communal value is that it brings specific groups of people together in a meaningful way.

Significance in the NPPF

The NPPF operates on a slightly differently set of criteria to the Conservation Principles, a divergent trajectory that will doubtless be addressed when the Conservation Principles are revised. Under the NPPF, value is expressed as *archaeological interest*, *architectural and artistic interest*, and *historic interest*. The following is taken from the NPPF PPG²⁹ document, followed by commentary:

Archaeological Interest

As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point. This interest most closely accords with evidential value. While it usefully extends that definition to include known elements, the emphasis on *archaeological* interest unhelpfully seems to preclude the built environment.

Architectural and Artistic Interest

These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture. This interest most closely accords with aesthetic value, but the use of the term *architectural* seems prejudiced against vernacular forms of built heritage, and fortuitous aesthetics.

Historic Interest

An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity. This interest most closely accords with historical value, and extends to include communal value, though with diminished emphasis.

²⁹ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>. Paragraph 006.

Concepts from World Heritage Guidance

World Heritage Sites are assessed with reference to their own, non-statutory, guidance³⁰. This includes the useful concepts of *authenticity* and *integrity*³¹:

Authenticity

Authenticity is the ability of a property to convey the attributes of the outstanding universal value of the property. *The ability to understand the value attributed to the heritage depends on the degree to which information sources about this value may be understood as credible or truthful.* Outside of a World Heritage Site, authenticity may usefully be employed to convey the sense a place or structure is a truthful representation of the thing it purports to portray. Converted farm buildings, for instance, survive in good condition, but are drained of the authenticity of a working farm environment.

Integrity

Integrity is the measure of wholeness or intactness of the cultural heritage and its attributes. Outside of a World Heritage Site, integrity can be taken to represent the survival and condition of a structure, monument, or landscape. The intrinsic value of those examples that survive in good condition is undoubtedly greater than those where survival is partial, and condition poor.

Designated Heritage Assets

The majority of the most important ('nationally important') heritage assets are protected through *designation*, with varying levels of statutory protection. These assets fall into one of six categories, although designations often overlap, so a Listed early medieval cross may also be Scheduled, lie within the curtilage of Listed church, inside a Conservation Area, and on the edge of a Registered Park and Garden that falls within a World Heritage Site. The NPPF Glossary defines a designated heritage asset as: *A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation*³².

Listed Buildings

A Listed building is an occupied dwelling or standing structure which is of special architectural or historical interest. These structures are found on the *Statutory List of Buildings of Special Architectural or Historic Interest*. The status of Listed buildings is applied to 300,000-400,000 buildings across the United Kingdom. Recognition of the need to protect historic buildings began after the Second World War, where significant numbers of buildings had been damaged in the county towns and capitals of the United Kingdom. Buildings that were considered to be of 'architectural merit' were included. The Inspectorate of Ancient Monuments supervised the collation of the list, drawn up by members of two societies: The Royal Institute of British Architects and the Society for the Protection of Ancient Buildings. Initially the lists were only used to assess which buildings should receive government grants to be repaired and conserved if damaged by bombing. The *Town and Country Planning Act 1947* formalised the process within England and Wales, Scotland and Ireland following different procedures. Under the 1979 *Ancient Monuments and Archaeological Areas Act* a structure cannot be considered a Scheduled Monument if it is occupied as a dwelling, making a clear distinction in the treatment of the two forms of heritage asset. Any alterations or works intended to a Listed Building must first acquire Listed Building Consent, as well as planning permission. Further phases of 'listing' were rolled out in the 1960s, 1980s and 2000s; English Heritage advise on the listing process and administer the procedure, in England, as with the Scheduled Monuments.

Some exemption is given to buildings used for worship where institutions or religious organisations (such as the Church of England) have their own permissions and regulatory procedures. Some structures, such as bridges, monuments, military structures, and some ancient structures may also be Scheduled as well as Listed. War memorials, milestones and other structures are included in the list, and more modern structures are increasingly being included for their architectural or social value.

Buildings are split into various levels of significance: Grade I (2.5% of the total) representing buildings of exceptional (international) interest; Grade II* (5.5% of the total) representing buildings of particular (national) importance; Grade II (92%) buildings are of merit and are by far the most widespread. Inevitably, accuracy of the Listing for individual structures varies, particularly for Grade II structures; for instance, it is not always clear why some 19th

³⁰ ICOMOS 2011: *Guidance on Heritage Impact Assessment for Cultural World Heritage Properties: a publication of the international Council on Monuments and Sites.*

³¹ UNESCO 2021: *Operational Guidelines for the Implementation of the World Heritage Convention.* Paragraphs 79-95.

³² <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>.

century farmhouses are Listed while others are not, and differences may only reflect local government boundaries, policies and individuals.

Other buildings that fall within the curtilage of a Listed building are afforded some protection as they form part of the essential setting of the designated structure, e.g. a farmyard of barns, complexes of historic industrial buildings, service buildings to stately homes etc. These can be described as having *group value*.

Conservation Areas

Local authorities are obliged to identify and delineate areas of special architectural or historic interest as Conservation Areas, which introduces additional controls and protection over change within those places. Usually, but not exclusively, they relate to historic settlements, and there are c.7000 Conservation Areas in England.

Scheduled Monuments

In the United Kingdom, a Scheduled Monument is considered an historic building, structure (ruin), or archaeological site of national importance. Various pieces of legislation, under planning, conservation, etc., are used for legally protecting heritage assets given this title from damage and destruction; such legislation is grouped together under the term 'designation', that is, having statutory protection under the *Ancient Monuments and Archaeological Areas Act 1979*. A heritage asset is a part of the historic environment that is valued because of its historic, archaeological, architectural or artistic interest; those of national importance have extra legal protection through designation. Important sites have been recognised as requiring protection since the late 19th century, when the first 'schedule' or list of monuments was compiled in 1882. The conservation and preservation of these monuments was given statutory priority over other land uses under this first schedule. County Lists of the monuments are kept and updated by the Department for Culture, Media and Sport. In the later 20th century sites are identified by English Heritage (one of the Government's advisory bodies) of being of national importance and included in the schedule. Under the current statutory protection any works required on or to a designated monument can only be undertaken with a successful application for Scheduled Monument Consent.

Registered Parks and Gardens

Culturally and historically important 'man-made' or 'designed' landscapes, such as parks and gardens are currently "listed" on a non-statutory basis, included on the 'Register of Historic Parks and Gardens of special historic interest in England' which was established in 1983 and is, like Listed Buildings and Scheduled Monuments, administered by Historic England. Sites included on this register are of national importance, many associated with stately homes of Grade II* or Grade I status. Emphasis is laid on 'designed' landscapes, not the value of botanical planting. Sites can include town squares and private gardens, city parks, cemeteries and gardens around institutions such as hospitals and government buildings. Planned elements and changing fashions in landscaping and forms are a main focus of the assessment.

Registered Battlefields

Battles are dramatic and often pivotal events in the history of any people or nation. Since 1995 Historic England maintains a register of 46 battlefields in order to afford them a measure of protection through the planning system. The key requirements for registration are battles of national significance, a securely identified location, and its topographical integrity – the ability to 'read' the battle on the ground.

World Heritage Sites

Arising from the UNESCO World Heritage Convention in 1972, Article 1 of the Operational Guidelines (2015, no.49) states: 'Outstanding Universal Value means cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity'. These sites are recognised at an international level for their intrinsic importance to the story of humanity, and should be accorded the highest level of protection within the planning system.

Setting

The assessment of direct effects to archaeological sites (where the identified heritage asset falls within the footprint of a development and thus is very likely to be damaged or destroyed) is relatively straightforward, the assessment of indirect effects (where the effect is communicated via impact on the *setting* of a heritage asset) is more nebulous and harder to convincingly predict.

The NPPF Glossary defines the setting of a heritage asset as: *The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting*

may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral³³.

The principal guidance on this topic is contained within one publication: *The Setting of Heritage Assets: Good Practice Advice* 3³⁴. Where the impact of a proposed development is largely indirect, the importance of the setting to the significance of the heritage asset becomes the primary consideration of the impact assessment. The following extracts are from GPA3³⁵:

The NPPF makes it clear that the extent of the setting of a heritage asset 'is not fixed and may change as the asset and its surroundings evolve'. Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated (see below Designed settings). Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.

While setting can be mapped in the context of an individual application or proposal, it cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time, and because new information on heritage assets may alter what might previously have been understood to comprise their setting and the values placed on that setting and therefore the significance of the heritage asset.

There are two ways in which change within the setting of a heritage asset may affect its significance:

- Where the setting of the heritage asset contributes to the significance of the heritage asset (e.g. the historic park around the stately home; the historic streetscape to the Listed shopfronts).
- Where the setting contributes to the ability to appreciate the significance of the heritage asset (e.g. clear views to a principal façade; well-kept garden to a Listed cottage).

GPA3 states: *The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place...*³⁶ *The Setting of Heritage Assets*³⁷ lists a number of instances where views contribute to the particular significance of a heritage asset:

- Those where the composition within the view was a fundamental aspect of the design or function of the heritage asset.
- Those where town- or village-scape reveals views with unplanned or unintended beauty.
- Those with historical associations, including viewing points and the topography of battles.
- Those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected.
- Those where relationships between the asset and other heritage assets or natural features or phenomena such as solar or lunar events are particularly relevant.
- Those assets, whether contemporaneous or otherwise, which were intended to be seen from one another for aesthetic, functional, ceremonial, or religious reasons, including military and defensive sites, telegraphs or beacons, prehistoric funerary and ceremonial sites, historic parks and gardens with deliberate links to other designed landscapes and remote 'eye-catching' features or 'borrowed' landmarks beyond the park boundary.

However, as stated in PPG³⁸: *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.*

Furthermore, as stated in GPA3³⁹: *Similarly, setting is different from general amenity. Views out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting.*

³³ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>.

³⁴ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.).

³⁵ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraphs 8, 9.

³⁶ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 10.

³⁷ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 11.

³⁸ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#assess-substantial-harm>. Paragraph 013.

³⁹ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 16.

These documents make it clear that views to, from, or including, a heritage asset can be irrelevant to a consideration of setting, where those views do not contribute to either the significance of the asset, or an ability to appreciate its significance.

In addition, visibility alone is no clear guide to visual impact. People perceive size, shape and distance using many cues, so context is critically important. For instance, research on electricity pylons⁴⁰ has indicated scenic impact is influenced by landscape complexity: the visual impact of pylons is less pronounced within complex scenes, especially at longer distances, presumably because they are less of a focal point and the attention of the observer is diverted. There are many qualifiers that serve to increase or decrease the visual impact of a proposed development, some of which are seasonal or weather-related.

Thus, the principal consideration of assessment of indirect effects cannot be visual impact *per se*. It is an assessment of the likely magnitude of effect, the importance of setting to the significance of the heritage asset, and the sensitivity of that setting to the visual or aural intrusion of the proposed development.

GPA3 also details other area concepts that exist in parallel to, but separate from, setting. These are *curtilage*, *historic character*, and *context*⁴¹.

Curtilage

Curtilage is a legal term describing an area around a building and, for listed structures, the extent of curtilage is defined by consideration of ownership, both past and present, functional association and layout. The setting of a heritage asset will include, but generally be more extensive than, its curtilage. The concept of curtilage is relevant to Listed Building Consent, and where development occurs within the immediate surroundings of the Listed structure.

Historic Character

The historic character of a place is the group of qualities derived from its past uses that make it distinctive. This may include: its associations with people, now and through time; its visual aspects; and the features, materials, and spaces associated with its history, including its original configuration and subsequent losses and changes. Character is a broad concept, often used in relation to entire historic areas and landscapes, to which heritage assets and their settings may contribute. The concept of character area⁴² can be relevant to developments where extensive areas designations (Registered Parks and Gardens, Registered Battlefields, Conservation Areas, and World Heritage Sites; also towns and larger villages) are divisible into distinct character areas that a development may impact differently due to proximity, visibility etc.

Context

The context of a heritage asset is a non-statutory term used to describe any relationship between it and other heritage assets, which is relevant to its significance, including cultural, intellectual, spatial or functional. Contextual relationships apply irrespective of distance, sometimes extending well beyond what might be considered an asset's setting, and can include the relationship of one heritage asset to another of the same period or function, or with the same designer or architect. A range of additional meanings is available for the term 'context', for example in relation to archaeological context and to the context of new developments, as well as customary usages. Setting may include associative relationships that are sometimes referred to as 'contextual'. This concept is a useful, though non-statutory one, as heritage assets may have a relationship with the surrounding landscape that is non-visual and based e.g. on their historical economy. This can be related to landscape context (below), but which is a physically deterministic relationship.

Landscape Context

The determination of *landscape context* is an important part of the assessment process. This is the physical space within which any given heritage asset is perceived and experienced. The experience of this physical space is related to the scale of the landform and modified by cultural and biological factors like field boundaries, settlements, trees, and woodland. Together, these contribute to local character and extent of the setting.

Landscape context is based on topography and can vary in scale from the very small – e.g. a narrow valley where views and vistas are restricted – to the very large – e.g. wide valleys or extensive upland moors with 360° views.

⁴⁰ Hull, R.B. & Bishop, I.D. 1988: 'Scenic Impacts of Electricity Transmission Towers: the influence of landscape types and observer distance', *Journal of Environmental Management* 27, 99-108.

⁴¹ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 7.

⁴² Historic England 2017: *Understanding Place: Historic Area Assessments*.

Where very large landforms are concerned, a distinction can be drawn between the immediate context of an asset (this can be limited to a few hundred metres or less, where cultural and biological factors impede visibility and/or experience), and the wider context (i.e. the wider landscape within which the asset sits).

When new developments are introduced into a landscape, proximity alone is not a guide to magnitude of effect. Dependant on the nature and sensitivity of the heritage asset, the magnitude of effect is potentially much greater where the proposed development is to be located within the landscape context of a given heritage asset. Likewise, where the proposed development would be located outside the landscape context of a given heritage asset, the magnitude of effect would usually be lower. Each case is judged on its individual merits, and in some instances the significance of an asset is actually greater outside of its immediate landscape context, for example, where church towers function as landmarks in the wider landscape.

Principal Views, Landmark Assets, and Visual Impact

Further to the consideration of views (above), historic and significant views are the associated and complementary element to setting, but can be considered separately as developments may appear in a designed view without necessarily falling within the setting of a heritage asset *per se*. As such, significant views fall within the aesthetic value of a heritage asset and may be *designed* (i.e. deliberately conceived and arranged, such as within parkland or an urban environment) or *fortuitous* (i.e. the graduated development of a landscape ‘naturally’ brings forth something considered aesthetically pleasing, or at least impressive, as with particular rural landscapes or seascapes), or a combination of both (i.e. the *patina of age*).

On a landscape scale views, taken in the broadest sense, are possible from anywhere to anything, and each may be accorded an aesthetic value according to subjective taste (this is the *amenity value* of views⁴³). Given that terrain, the biological and built environment, and public access restrict our theoretical ability to see anything from anywhere, in this assessment the term *principal view* is employed to denote both the deliberate views created within designed landscapes, and those fortuitous views that may be considered of aesthetic value and worth preserving, where they contribute to significance.

It should be noted, however, that there are distance thresholds beyond which perception and recognition fail, and this is directly related to the scale, height, massing, and nature of the heritage asset in question. For instance, beyond 2km the Grade II cottage comprises a single indistinct component within the wider historic landscape, whereas at 5km or even 10km a large stately home or castle may still be recognisable. By extension, where assets cannot be seen or recognised i.e. entirely concealed within woodland, or too distant to be distinguished, then visual harm to setting is moot. To reflect this emphasis on recognition, the term *landmark asset* is employed to denote those sites where the structure (e.g. church tower), remains (e.g. earthwork ramparts) or – in some instances – the physical character of the immediate landscape (e.g. a distinctive landform like a tall domed hill) make them visible on a landscape scale. In some cases, these landmark assets may exert landscape *primacy*, where they are the tallest or most obvious man-made structure within line-of-sight. However, this is not always the case, typically where there are numerous similar monuments (multiple engine houses in mining areas, for instance) or where modern developments have overtaken the heritage asset in height and/or massing.

Where a new development has the potential to *visually dominate* a heritage asset, even if the contribution of setting to the significance of a heritage asset is minimal, it is likely to impact on the ability of setting to facilitate an appreciation of the heritage asset in question and can be regarded as an adverse effect.

Visibility alone is not a clear guide to visual impact. People perceive size, shape and distance using many cues, so context is critically important. For instance, research on electricity pylons (Hull & Bishop 1988) has indicated scenic impact is influenced by landscape complexity: the visual impact of pylons is less pronounced within complex scenes, especially at longer distances, presumably because they are less of a focal point and the attention of the observer is diverted. There are many qualifiers that serve to increase or decrease the visual impact of a proposed development (see TABLE 17), some of which are seasonal or weather-related.

⁴³ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraphs 14-16.

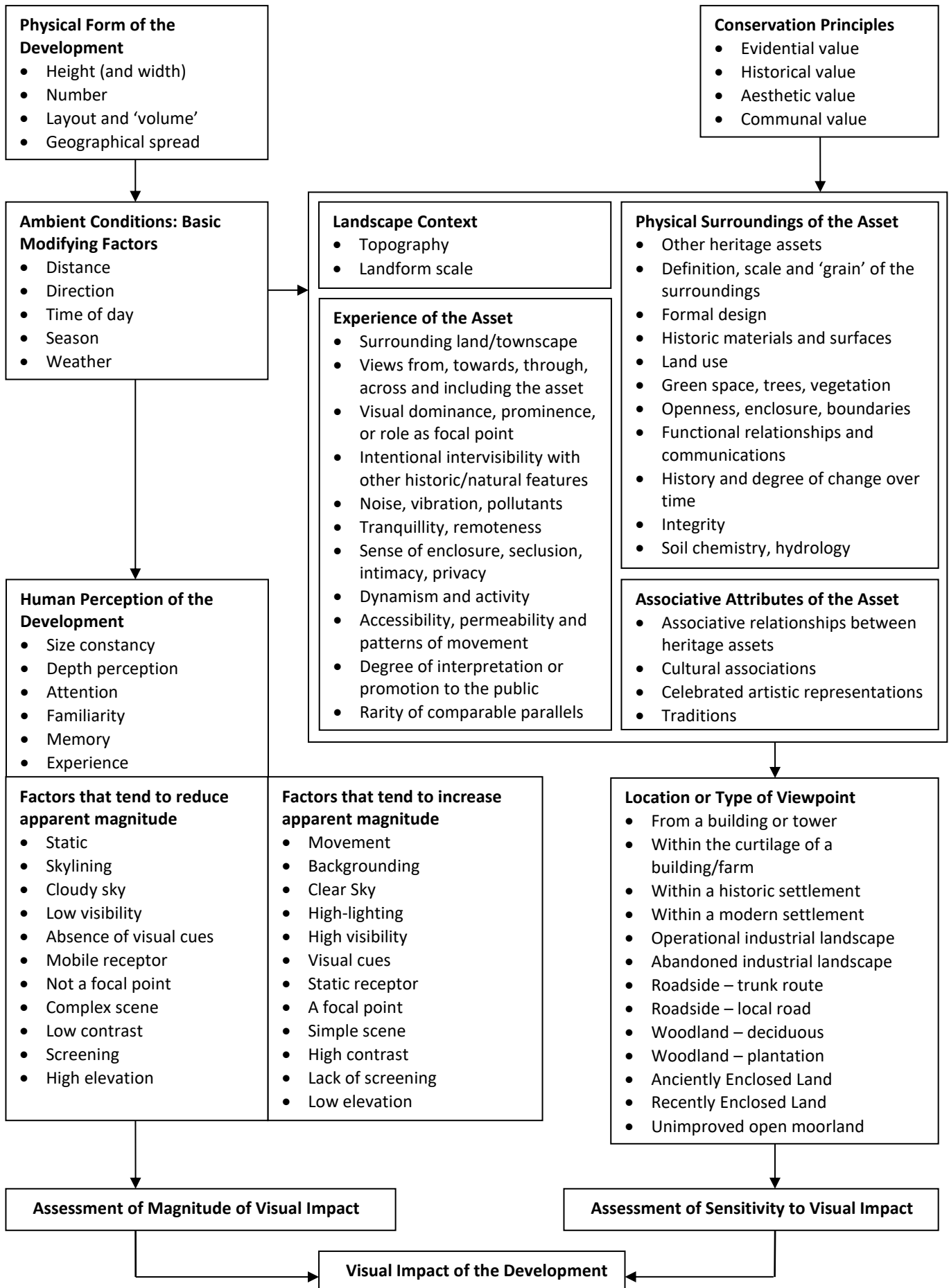


TABLE 17: THE CONCEPTUAL MODEL FOR VISUAL IMPACT ASSESSMENT PROPOSED BY THE UNIVERSITY OF NEWCASTLE (2002, 63), MODIFIED TO INCLUDE ELEMENTS OF ASSESSMENT STEP 2 FROM THE SETTING OF HERITAGE ASSETS (HISTORIC ENGLAND 2017, 11, 13), SOUTH WEST ARCHAEOLOGY LTD.



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