

## Land at Glebe Farm, Minchinhampton

### Heritage Note

#### edp1965\_r006a

#### 1. Introduction

- 1.1 The following note has been prepared by the Environmental Dimension Partnership Ltd (EDP) on behalf of Archstone Land ('the client') who are promoting the allocation of Land at Glebe Farm ('the site') for housing provision via the Local Plan Review.
- 1.2 As part of that process, statutory consultees have provided comment regarding the suitability (in their view) of specific sites. This note has been prepared specifically to address the consultation response for the site issued by the Cotswolds Conservation Board (CCB) dated 07 February 2020 in respect of heritage matters. Landscape matters, as appropriate, will be addressed by a separate note (ref: edp1965\_r007a).

#### 2. Background

- 2.1 The involvement of EDP commenced in 2014 and to date we have undertaken surveys and prepared reports in relation to ecology, arboriculture, landscape, archaeology and heritage matters. These reports, and the consultation undertaken to inform them, were produced in connection with a planning application submitted in 2015 (ref. S15/2567/FUL) which was a hybrid application comprising a detailed application for 150 dwellings and an outline planning application for a potential doctor's surgery/community facility.
- 2.2 An archaeology and heritage assessment was prepared in 2015 (H\_EDP1965\_01a) following the 5-step approach set out within the Setting of Heritage Assets (Historic England 2015). The report set out the baseline for the site and assessed the potential for any effects as a result of the sites development for housing. This work included consultation with the archaeological advisor and Historic England.
- 2.3 The report identified that the site does not contain any designated heritage assets where there would be a presumption in favour of their physical retention. Within 1km the report identified 101 listed buildings, 3 scheduled monuments, 1 conservation area and 1 registered park and garden, upon which it concluded there will be no adverse impacts from the development of the site for housing.
- 2.4 To the immediate west of the site is the scheduled monument comprising banks and ditch at Glebe Farm (**SM1015422**). An assessment of its setting established that this comprises a mix of elements dating from the 20<sup>th</sup> century, defined by playing fields, dense housing to the south-east, south, north and north-east, and a mix of housing and equestrian structures to the east. As such the setting of the monument was found to make no contribution to its significance

as a heritage asset. In addition to which, there is very limited experience of the monument from within the site.

- 2.5 Despite the site making no contribution to the monument's significance, the archaeology and heritage report informed the development of an outline masterplan that provides for an area of space adjacent to the east of the scheduled monument, and will ensure that the residential development is located an appropriate distance away, such that the development of the site for housing will not harm the scheduled monument.
- 2.6 Research undertaken to establish the archaeological potential of the site, which included a geophysical survey, has confirmed that it is highly unlikely that buried archaeological deposits that relate to the scheduled area are present within the site.

### **3. Consultation**

- 3.1 As part of the development of the outline masterplan, Historic England were consulted regarding the potential for effects on the significance of the monument. In the first instance a site meeting was held to discuss the proposals and the potential for effects on the scheduled area. Following on from that meeting the Historic England inspector confirmed that:

*“With regards to the development I have no immediate concerns with regards to the setting. The only issue may be the proximity of the Doctors Surgery and its car park. A suitable distance has been maintained for the rest of the development, as has some of the view through the site to the open countryside beyond. This is important as the earthwork was always on the edge of the village with open countryside to the east. Without an idea of the massing, materials and height of the buildings proposed, especially the Doctors Surgery, I cannot provide you with detailed comments at this stage.”*

- 3.2 It should be noted that the land put aside for a doctor's surgery would be subject to a separate planning application. However, the proposed planting within this area would ensure it's set back from the monument, the eastern side of which in this location is already buffered from the site by modern development, which it has been established does not contribute to the monument's significance.
- 3.3 Consultation was also undertaken with Historic England regarding the possibility of a pathway or footbridge across the monument to the playing fields to the west, but to date this option has not been pursued and does not form part of the outline masterplan.
- 3.4 As such, Historic England are satisfied that the site can be developed with no impact on the significance of the scheduled monument, but that further detail regarding the form and location of the doctor's surgery would need to be provided as part of that planning application.

#### **4. Discussion and Conclusion**

- 4.1 The commentary within the CCB response identifies a “...*potential significant adverse effect on the historic environment of this location*”. The comments identify that the western boundary is adjacent to or overlaps the scheduled area and that “...*there is highly likely to be significant footfall across the monument...*” between the site and the playing fields to the west.
- 4.2 In evidence the response points towards the Council’s Sustainability Appraisal, which it is suggested identified that a “*significant negative effect likely*” and with regard to the Council’s Strategic Assessment of Land Availability (SALA) Heritage Impact Assessment that the site is identified as “*a very sensitive site with very significant heritage constraints*”.
- 4.3 On the second point by way of qualification this has been extracted from the 2017 SALA for site MIN005 as part of a list identified as ‘Additional Sites with Future Potential’. So far from dismissing this site the Council has in fact already identified the site as one with potential for housing development.
- 4.4 The SALA report identifies that:
- “...*the impact on the setting of the SAM is likely to influence the scale and massing of any new development, rather than to preclude any development at all.*”
- 4.5 The report continues by stating that the site:
- “...*may have future potential subject to archaeological investigation and a sensitive layout for housing or community uses, retaining openness and countryside views, should the Local Plan strategy identify the need for growth in this location.*”
- 4.6 As such, the need for further investigation is noted as is the need for a sensitive layout. The assessments provided by EDP have fully investigated the impact of the development of the site for housing and have concluded, in line with the consultation responses received from Historic England and the archaeological advisor to Stroud District Council, that the site can be developed without harm to heritage assets and specifically the Scheduled Monument.
- 4.7 It is therefore unclear how, in the absence of any further investigation, that the CCB comments conclude that “...*the proposed allocation would definitely have the potential to have a significant adverse effect on the historic environment*”.
- 4.8 The CCB then go on to recommended that the allocation be classed as ‘major development’ on the basis of the identified ‘significant adverse impact’, which is set out above, in the authors view, both unqualified and incorrect. Again, the point needs to be made that Historic England has “*no immediate concerns*” when responding to the outline masterplan, and as statutory consultees with specific remit to heritage matters of national significance, it is their professional view that should take precedence in these matters.



- 4.9 Therefore, if heritage harm is a pre-determining factor in the identification of a housing site as ‘major’ development, the CCB have incorrectly identified this site as such. On the basis of the evidence prepared by EDP and there is no reason for the site to be withdrawn as the CCB consultation response recommends and that the site can be developed in accordance with the Planning Policies contained within the National Planning Policy Framework (NPPF) and Stroud District Local Plan, specifically Policy ES10.