

## 13 CULTURAL HERITAGE

### 13.1 INTRODUCTION

13.1.1 This Chapter reports the likely significant effects of the Proposed Development in terms of archaeology and built heritage (collectively 'cultural heritage') in the context of the Application Site and surrounding area.

13.1.2 This Chapter is not intended to be read as a standalone assessment, and reference should be made to the front end of this ES Volume [Chapters 1-4].

13.1.3 In addition, reference should be made to the following figures and appendices supporting this Chapter:

- **Figure 13.1** – Map of Archaeological Receptors
- **Figure 13.2** – Map of Built Heritage Receptors
- **Appendix 13.1** – Cultural Heritage Statement (RPS, 2020)
- **Appendix 13.2** – Geophysical Survey (Sumo, 2020)
- **Appendix 13.3** – Geophysical Survey (Stratascan, 2013)
- **Appendix 13.4** – Archaeological Trial Trench Evaluation (Oxford Archaeology 2014)
- **Appendix 13.5** – Archaeological Trial Trench Evaluation (Archaeology Warwickshire 2021)

13.1.4 Built Heritage and Archaeology encompasses a wide range of features resulting from human intervention in the landscape, varying in scope from buried prehistoric archaeological remains up to late-twentieth century industrial structures. Built Heritage and archaeological resources considered in this Chapter can be divided into the following categories:

#### Archaeology

- Scheduled Ancient Monuments
- Non-designated archaeological assets

#### Built Heritage

- Listed Buildings (Grades I, II\*, and II)
- Locally listed and non-designated built heritage assets

### 13.2 ASSESSMENT APPROACH

#### Methodology

13.2.1 No standard Environmental Impact Assessment (EIA) methodologies exist for Archaeological and Built Heritage Assessment. However, the assessment methodology has been guided by the latest and most comprehensive guidance provided in the Chartered Institute for Archaeologists Standard and Guidance for Historic Desk-Based Assessment (revised 2020), Historic England's Advice Note 12 (HEAN12): Heritage Statements of Significance (2019) and Good Practice Advice Note 3 (GPA3): The Setting of Heritage Assets (2<sup>nd</sup> ed. 2017), as well as the Design Manual for Roads and Bridges (DMRB) LA 106 (Revision 1) (2020).

13.2.2 Although the latter was designed for road schemes in relation to EIAs, it is accepted as good practice for the assessment of cultural heritage in relation to archaeology, listed buildings and historic landscapes within EIAs. These documents do

not provide a prescriptive approach to assessment but identify principles and good practice that have been applied in the methodology for this assessment.

13.2.3 A three-stage approach is adopted in order to reach an understanding of the level of any effect that a proposed development may have on a cultural heritage receptor. Firstly, it necessary to understand the importance/sensitivity of the asset. Then, it is necessary to determine the predicted magnitude of change/impact arising to the asset as a result of the Proposed Development. Finally, using a matrix that measures both receptor sensitivity and impact magnitude, an assessment of the magnitude of effect of the Proposed Development on the receptor is produced. This approach, including the matrix, is set out in detail below.

13.2.4 Recent studies implemented within the Application Site and surrounding area, as baseline studies to this Chapter, have been used to inform its preparation; in particular to identify heritage receptors and the likely magnitude of change arising as a result of the Proposed Development.

13.2.5 The Application Site has been subject to a series of archaeological investigations comprising a desk-based assessment in July 2020 (RPS), and a geophysical survey in October 2020 (Sumo) , which can be found in the Cultural Heritage Statement at **Appendix 13.1** and **Appendix 13.2** respectively.

13.2.6 The Environment Agency LiDAR data was accessed in order to assist in identifying any unknown archaeological features within the site and to help confirm the presence of those already recorded. Light Detection and Ranging (LiDAR) is an airborne mapping technique which employs a laser to measure the distance between an aircraft and the ground. Up to 100,000 measurements per second are recorded, which allows for a highly detailed terrain model to be made of the ground at special resolutions of between 0.25m and 2m.

13.2.7 The built heritage baseline study included assessments of significance and of impact, which were carried out in line with guidance contained in Historic England's HEAN12 (2019) and GPA3 (2017). This study, which can be found in the Cultural Heritage Statement at **Appendix 13.1**, was informed by a search of national and local databases of known heritage assets (including the National Heritage List for England (NHLE) and the Gloucestershire Historic Environment Record (HER); an historic map regression; historic research; and a visual assessment undertaken to determine how the Proposed Development would have a bearing on the surrounding historic built environment.

### **Assessment of Significance**

13.2.8 As noted above, a three-stage approach has been adopted in order to reach an understanding of the significance of any environmental effects arising from the Proposed Development in regard to cultural heritage, with the sensitivity of the receiving environment, together with the magnitude of change, defining the significance of the effect.

13.2.9 This process is not quantitative, but relies upon professional judgement at each step. However the factors considered in informing these judgements and in arriving at the various rankings and magnitudes of effect are observable facts (i.e. numbers of assets, special relationships, designations, impacts).

### **Sensitivity of the Receptor**

13.2.10 The sensitivity of a cultural heritage asset depends on factors such as the condition of the asset and the level of architectural, historic, and/or archaeological

interest it is perceived to have (as defined in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG)).

13.2.11 Determination of the sensitivity of built heritage receptors takes account of any existing statutory designation and, for non-designated heritage receptors, professional judgement and any criteria relating to local listing adopted by the relevant Local Planning Authority. For archaeology, the Secretary of State’s non-statutory criteria for assessing the national importance of archaeological monuments and professional judgements has been taken into account. **Table 13.1** below sets out the criteria for assessing sensitivity.

**Table 13.1: Criteria for Assessing the Sensitivity of Cultural Heritage Receptors**

<b>Sensitivity</b>	<b>Definition</b>
Very High	- World Heritage Sites
High	- Scheduled Monuments and archaeological sites of demonstrable schedulable quality and importance - Protected Wreck Sites - Registered Battlefields - Listed Buildings - Registered Parks and Gardens
Medium	- Conservation Areas - Non-designated archaeological sites of demonstrable regional importance
Low	- Non-designated built heritage assets and locally listed buildings - Sites whose importance is limited by poor preservation and poor survival of contextual associations
No importance	- Sites with no surviving archaeological or historical component
Unknown	- Importance cannot be ascertained

Magnitude of Effect

13.2.12 Determining the magnitude of effect is based on an understanding of the degree of change that would be experienced by a receptor and its setting if a development scheme were to be completed as compared with a ‘do nothing’ situation. This change may occur, for example, through temporary or permanent land take or excavation, ground disturbance and compaction, alterations to or removal of historic fabric of a built heritage asset or change to the setting of a built heritage asset. Effects can be ‘adverse’ or ‘beneficial’, with this distinction based on the principle (established in the National Planning Policy Framework (NPPF)) that the preservation of the receptor is preferred, and that total physical loss of the receptor is the least preferred.

- Development effects can be characterised as to whether they would be:
- Direct or Indirect;
- Short, Medium or Long Term;
- Reversible or Irreversible; and/or
- Cumulative.

13.2.13 The magnitude of effect is assessed by taking into consideration the extent/proportion of the site/feature affected, its type, its survival/condition, its

fragility/vulnerability and its potential amenity value. It is expressed in terms of harm or enhancement to a receptor’s historic, architectural and/or archaeological interest.

13.2.14 In considering the above factors the criteria for assessing magnitude of predicted change on cultural heritage resources are given in **Table 13.2** below.

**Table 13.2: Criteria for Assessing the of Magnitude of Effect on Cultural Heritage Receptors**

Magnitude		Definition
High	Adverse	- Total or substantial loss of the receptor and/or the quality and integrity of the receptor; severe damage to key characteristics, features or elements; comprehensive changes to the receptor’s setting, such that the architectural, historic, and/or archaeological interest of the receptor (or the legibility thereof) is totally or substantially reduced.
	Beneficial	- Large-scale or major improvement of receptor quality; extensive restoration or enhancement; major improvement of attribute quality; changes to the receptor’s setting so that the architectural, historic and/or archaeological interest of the receptor (or the legibility thereof) is substantially enhanced.
Moderate	Adverse	- Partial loss of the receptor, but not adversely affecting the integrity of the resource; partial loss of/damage to key characteristics, features or elements; changes to the receptor’s setting, such that the architectural, historic and/or archaeological interest of the receptor (or the legibility thereof) would be materially affected/considerably devalued, but not totally or substantially lost.
	Beneficial	- Benefit to, or addition of, key characteristics, features, or elements of the receptor; improvement of attribute quality; change to the receptor’s setting, such that the architectural, historic and/or archaeological interest of the receptor (or the legibility thereof) would be materially enhanced.
Low	Adverse	- Some measurable change to the attributes, quality or vulnerability of the receptor; minor loss of, or alterations to, one or more key characteristics, features or elements; changes to the receptor’s setting resulting in a perceivable level of harm to the receptor’s architectural, historic, and/or archaeological interest (or the legibility thereof), but insubstantial relative to the overall interest of the receptor.
	Beneficial	- Low level benefits to, or additional of, one of more key characteristics, features or elements; some beneficial impact to an attribute or a reduced risk of a negative impact occurring; change to the

		receptor’s setting resulting in a perceivable enhancement to the receptor’s architectural, historic, and/or archaeological interest (or the legibility thereof), but insubstantial relative to the overall interest of the receptor.
Negligible	Adverse	- A very slight loss or detrimental alteration to one or more characteristic, feature, or element of the receptor; very minor changes to the receptor’s setting resulting in an almost imperceptible level of harm to its historic, architectural and/or archaeological interest (or the legibility thereof).
	Beneficial	- Very minor benefits to, or additional of, one or more characteristic, feature, or element of the receptor; very minor changes to the receptor’s setting resulting in an almost imperceptible level of enhancement to its historic, architectural and/or archaeological interest (or the legibility thereof).
No impact		- No change to a resource and/or its setting; change to a resource and/or its setting that has no observable impact on the architectural, historic or archaeological interest of the receptor.

Assessing Significance

13.2.15 The sensitivity of the receiving environment, together with the magnitude of effect, defines the significance of the environmental effect as set out in the matrix contained in **Table 13.3** below.

13.2.16 A significance of effect that is ‘major’ or ‘moderate’ is deemed to be a ‘significant’ effect in the context of EIA Regulations.

13.2.17 Designated heritage assets such as scheduled ancient monuments and listed buildings and their settings are all of high sensitivity and so even low levels of predicted magnitude of change to these features can be significant in EIA terms. **Table 13.3:** Significance Matrix.

**Table 13.3: Significance Matrix**

Magnitude of Change	Sensitivity of Receptor				
		High	Medium	Low	Negligible
High		Major	Major	Moderate	Negligible
Medium		Major	Moderate	Minor to Moderate	Negligible
Low		Moderate	Minor to Moderate	Minor	Negligible
Negligible		Negligible	Negligible	Negligible	Negligible

**Legislative and Policy Framework**

13.2.18 The assessment contained within this Chapter and the accompanying Cultural Heritage Statement (RPS 2020) has been conducted in line with the following legislation, national and local planning policy, and guidance:

- Ancient Monuments and Archaeological Areas Act 1979, amended by the National Heritage Act 1983 and 2002, and updated in April 2014;
- Planning (Listed Buildings and Conservation Areas) Act 1990;
- National Planning Policy Framework (NPPF) (2019);
- Planning Practice Guidance (PPG) (DCLG, 2019);
- Conservation Principles, Policies and Guidance (English Heritage, 2008);
- Good Practice Advice Note 3: The Setting of Heritage Assets (Historic England, 2nd ed., 2017);
- Chartered Institute for Archaeologists Standard and Guidance for Historic Desk-Based Assessment (CIfA, 2020);
- Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031 (2017);
- Hedgerow Regulations 1997, amended by The Hedgerows (England)(Amendments) Regulations 2002;

13.2.19 For details, reference should be made to Section 2 of **Appendix 13.1**.

### **Scoping Criteria**

13.2.20 As agreed at the scoping stage, the assessment in this Chapter will identify cultural heritage resources that may be physically affected by the Proposed Development, or affected through change to their respective settings; assess any previous impacts which may have affected resource survival; assess development impacts and hence the significance of environmental effects arising from the Proposed Development, at both the construction and operation phases; recommend mitigation measures where appropriate; quantify residual effects; and quantify any cumulative effects.

13.2.21 Accordingly, the following will be considered below:

- Construction phase – archaeological receptors
- Construction phase – built heritage receptors
- Operational phase – archaeological receptors
- Operational phase – built heritage receptors

### **Limitations to the Assessment**

13.2.22 Due to Covid-19 restrictions, it was not possible to access the local record office to review archive material to inform the Cultural Heritage Statement (RPS 2020) produced as a baseline study for this Chapter. However, readily available online sources, including tithe mapping and the Victoria County History, mean the closure of the archives is not deemed to negatively affect the assessment in this instance.

## **13.3 BASELINE CONDITIONS**

### **Site Description and Context**

13.3.1 The extent of the Application Site is defined in **Chapter 3** and depicted in **Figures 13.1 and 13.2**.

13.3.2 The whole of the application site is approximately 52.23 ha. It comprises arable land and woodland located between the settlements at Ashfield and Fiddington, approximately 3km south-east of Tewkesbury.

13.3.3 The northern parts of the Application Site comprise part of a parcel of land that benefits from an extant permission for a mixed-use development [ref. 17/00520/OUT].

13.3.4 The Application Site is enclosed with views beyond the boundary largely restricted by the presence of dense, mature hedgerows and trees. The M5 motorway also forms an elevated physical boundary to the west of the Application Site. Where views out of the Application Site are achieved, they are mainly to the hills in the distance and the large industrial units in Ashchurch to the north. It is noted that there are occasional, distant views to Tewkesbury Abbey tower and the tower at St Nicholas' Church, Ashchurch.

13.3.5 The topography of the Application Site undulates, but overall slopes downhill to the north and has a height above Ordnance Datum (aOD) ranging from 14m – 21m.

13.3.6 The Tirlle Brook crosses the northern part of the Application Site. The River Avon is located approximately 2.5km north-west of the Application Site, and the River Severn approximately 2.9km to the north-west.

13.3.7 The British Geological Survey records that the underlying geology of the Application Site comprises mudstone of the Charmouth Mudstone Formation. No superficial deposits are recorded for the majority of the study site; however, alluvium is recorded by the Tirlle Brook in the northern part of the Application Site.

### **Baseline Survey Information**

#### **Archaeological Receptors**

13.3.8 This Chapter is supported by the findings of a recent desk-based assessment, the results of a geophysical survey and archaeological trial trench evaluation. The desk-based assessment was undertaken in July 2020 and informed the scope of the surveys for the geophysical survey (October 2020) and trial trenching (January 2021). The northern part of the Application Site has been the subject of a geophysical survey in January 2013 and archaeological trial trenching in March, April and October 2013.

13.3.9 These studies identified a number of archaeological receptors which could be affected by the Proposed Development; these are discussed below. A plan showing the location of the archaeological receptors in relation to the Application Site is provided in **Figure 13.1**.

13.3.10 Archaeological Resource **AR1** comprises evidence for Medieval ridge and furrow cultivation. Such activity is evident in the geophysical survey data across the Application Site. The archaeological significance of the **AR1** ridge and furrow remains is negligible and considered to be of Low sensitivity. **AR1** is present across the Application Site as a whole and as such is not depicted on Figure 13.1.

13.3.11 Previous geophysical survey and trial trenching undertaken in the central part of the Application Site identified two small areas of archaeological activity, labelled as **AR2** and **AR3** on **Figure 13.1**. Both of these receptors were interpreted as relating to small-scale late Prehistoric to early Roman settlement activity. Dating evidence retrieved during the evaluation trial trenching indicates a date ranging from the 3<sup>rd</sup> century BC to the 1st century AD. The presence of pottery, animal bone, slag and fragments of oven structures suggests that these areas were used for settlement as opposed to stock enclosure.

13.3.12 Receptors **AR2** and **AR3** were not of the highest order of preservation, having been truncated by historic and modern ploughing activity. In some cases, the features had been cut by former ridge and furrow cultivation (**AR1**) as well as land drains.

Furthermore, archaeological evidence of these dates is well recorded in Gloucestershire, with other examples known close to the Application Site. Therefore, **AR2** and **AR3** are considered to be of local significance and Low sensitivity.

13.3.13 The 'Battle of Tewkesbury 1471' Registered Battlefield lies 1.5km to the west of the Application Site at its closest point, and a Scheduled Monument relating to a Deserted Medieval Villages lies 700m to the west. However, given the intervening distance, and that the Application Site is separated and screened from Scheduled Monument and Registered Battlefield by the M5 motorway and other topographical landscape features, the Application Site is not considered to lie within the setting of, nor contribute to the significance of, either. They are therefore not considered as Receptors in this ES Chapter.

#### Built Heritage Receptors

13.3.14 The baseline built heritage study undertaken in July 2020 identified that the Application Site includes no built heritage resources within its boundary. Fifteen listed buildings lie within 1km of the Application Site; however, the majority of these will be unaffected by the Proposed Development due to the lack of any visual, functional, or known historic connection with the Application Site.

13.3.15 Of the listed buildings within 1km, the Application Site is considered to form part of the setting of, and thereby have the potential to affect, only one: the Grade II\* Church of St Nicholas, Ashchurch. The Application Site is, however, also considered to form part of the setting of, and thereby has the potential to affect, one listed building situated at a distance greater than 1km: the Grade I Abbey Church of St Mary, Tewkesbury. These two listed buildings are considered below as built heritage receptors **BH1** and **BH2**, with the location of these receptors in relation to the Application Site provided in **Figure 13.2**.

#### **BH1 (Church of St Nicholas Ashchurch)**

13.3.16 The Church of St Nicholas, Ashchurch is an Anglican parish church constructed in the twelfth century with later alterations and addition from the thirteenth, late-fourteenth, and fifteenth centuries. The Church was restored in 1889 and again in 1931, with the most recent substantial addition being a small mid-late twentieth century extension.

13.3.17 The Church has a six-bay, twelfth-century nave constructed in uncoursed limestone, above which there is a coursed, squared and finely dressed limestone and sandstone clerestory that was added in the fifteenth century. To the south, there is a fourteenth-century porch and late-fourteenth century tower, both constructed of large blocks of coursed, finely dressed limestone. The tower is of three stages with diagonal buttresses and a moulded plinth, two-light belfry windows with stone louvres, and a battlemented parapet with crocketed pinnacles and a string with eroded gargoyles. A mixture of lead, artificial stone slate and red tile roofing materials are evident.

13.3.18 The Church's interior was heavily remodelled and much fabric was replaced in the nineteenth century. However, it retains some small elements of earlier decorative wall paintings, murals and panels, including a painted Tudor frieze within the chapel. The asset also retains a fifteenth century rood screen and a collection of fine sixteenth and seventeenth century fixtures and fittings, as well as a number of monuments dating from the seventeenth to nineteenth centuries.

13.3.19 The Church of St Nicholas, Ashchurch, is of more than special historic and architectural interest, which is reflected in its designation as a Grade II\* listed building. Specifically, it possesses historic special interest as a parish church with Medieval

origins, with the fabric of the building and the surviving (and in some cases lost) decoration, fixtures and fittings providing a material record of religious belief and practices in England from the twelfth century. The Church also possesses architectural special interest, with the Church of St Nicholas being a relatively rare surviving example of ecclesiastic architecture from the twelfth century. Further architectural special interest is provided by the later alterations and additions, which demonstrate changing tastes in ecclesiastical architecture over subsequent centuries and contribute to the overall aesthetic merits of the building. As a functioning parish church, the building is also likely to possess communal value, both as a place of worship for the local Anglican community and as a focal point for the wider local community.

13.3.20 The Church of St Nicholas is primarily experienced in its immediate setting, which comprises the surrounding churchyard and nearby vicarage. This immediate setting helps to place the building in its historic and functional setting, contributing to an understanding of its historic special interest as a parish church. However, the degree of mature tree screening around the Church, along with the Church's relatively diminutive scale, limit intervisibility with the settlement and surrounding landscape beyond. Those views of the Church which are granted from its wider setting are of the tower only, set within a massing of mature tree cover and, as such provide only a limited understanding of the building's historic and architectural special interest. Moreover, such views are also heavily impacted by the nearby road bridge severing the adjacent railway line and the large industrial development north of this road, parallel with the Church. It is consequently difficult to appreciate it as an historically rural and isolated parish church.

13.3.21 The Application Site forms part of the Church's wider setting to the south-west, with some long-distance views of the Church's tower available from the northern parts of the Application Site. These views make a small positive contribution to the ability to appreciate the historic and architectural interest of the Church; although some are detracted from by the presence of intervening industrial buildings. The Church is not visible from the majority of the Application Site, however, which shares no evident historic or functional connection with the Church. Moreover, whilst in agricultural use, the visual divorcing between the Church and the Application Site that results from intervening distance, road, and post-war development, means it makes no more than a negligible contribution to an understanding of the Church's historic setting.

13.3.22 In summary, as a Grade II\* listed building the Church of St Nicholas, Ashchurch (**BH1**) is a built heritage receptor of high sensitivity. Its special historic and architectural interest, which warrants its designation at Grade II\*, is principally derived from its historic form and fabric, with its immediate setting making a secondary contribution. The Application Site forms a small part of its wider setting and makes only a negligible contribution to its overall special interest.

### **BH2 (The Abbey Church of St Mary, Tewkesbury)**

13.3.23 The Abbey Church of St Mary, commonly known as Tewkesbury Abbey, is a former Benedictine Abbey Church, founded in c.1087 by Robert Fitzhamon and consecrated in 1121. Following the Dissolution of the Monasteries, it was purchased from the Crown by the residents of Tewkesbury and has since served as their parish church.

13.3.24 The Abbey Church has undergone a series of alterations since it was founded. The Church's central tower dates from the second quarter of the twelfth century and the north transept was altered in the thirteenth century, with subsequent further alterations in the fourteenth and seventeenth centuries. At the Dissolution, the monastic buildings surrounding the Abbey were removed, as was the East Lady Chapel. Other notable removals have included the pews in 1796, the demolition of a detached belfry in 1817, and the galleries at the crossing in 1909.

13.3.25 A major restoration of the building was also undertaken under the instruction of Sir Gilbert Scott and Sons from 1875-70. Victoria County History notes that Scott's restoration of the Abbey Church was more conservative than some of his 'restoration' elsewhere; nevertheless, it aroused considerable concern at the time and impelled William Morris to inveigh against what he saw as a damaging decision. This eventually led to the setting up of the Society for the Protection of Ancient Buildings (SPAB), the first amenity society of its kind.

13.3.26 The Church as it stands today is largely constructed in limestone ashlar, although some early work was completed in coursed lias, and the roof is covered in lead or tile. It is arranged with an eight bay aisled nave and north porch, east chantry chapels, choir and presbytery to a three-sided apse. The west front possesses a large seven-light 'Perpendicular' window c.1686 set in a Norman arch of six orders, which the NHLE description notes was likely intended to be flanked by twin towers that were never built. As a consequence of successive alteration and addition, the Church displays a high degree of architectural detailing in a range of architectural styles. The asset's dominant feature, however, is its crossing tower. The tower is in four stages, with a crenelated parapet, flat corner buttresses, and two-stage corner turrets with pinnacles. The NHLE describes it as one of the finest surviving Norman towers in Europe. The interior of the building also possesses an abundance of architectural and decorative features dating from the Norman period through to the nineteenth century.

13.3.27 The Abbey Church of St Mary, Tewkesbury is a building of exceptional architectural and historic interest, which is reflected in its designation at Grade I. It possesses exceptional historic interest as a parish church with origins as a Norman Benedictine Abbey Church, providing a material record of changing ecclesiastical life and religious belief in England from the eleventh century onwards. The building also possesses exceptional architectural and artistic interest, with its structure and decorative features, which are of the highest quality design and craftsmanship, demonstrating changing fashions in ecclesiastical architecture. As a place of worship, the building serves as a symbol of Christian faith, and it also now serves more generally as a meeting place for the local community, providing the asset with layers of communal value. The Church also possesses a degree of historic association with William Morris and SPAB, as a result of its role in the society's formation, and with Gilbert Scott, whose 'restoration' work Morris objected to.

13.3.28 The Abbey Church is experienced in an immediate, intermediate and extended setting, comprising the Abbey's grounds, the town of Tewkesbury and the wider surrounding landscape across which its imposing tower was designed (and continues to) be visible. Much reduced and altered following the Reformation, the Abbey grounds provide only a limited understanding of the Church's Benedictine origins, but remain largely in the same form as they were in the late-nineteenth century and contribute to an understanding of the building in its subsequent role as a parish church. The historic and architectural interest of the Church is also most clearly appreciated from within its immediate setting, although there are many views of it from the surrounding parts of Tewkesbury in which its exceptional architectural and historic interest can be appreciated. There are also long-distance views of the Church's crossing tower from the wider surrounding landscape. Such views provide little understanding of the Church's architectural detailing but provide an understanding of the Church as an important landmark building, as it was designed to be.

13.3.29 Comprising a parcel of land some 2.5km east of the Church at its nearest point, the Application Site forms a small part of the Church's extended setting. There are some long-distance views of the Church's tower available intermittently from across the Application Site, which contribute to an understanding of the Church's landmark status and therefore contribute positively to its architectural and historic interest. However, there are no return views of the Application Site from the Church or its immediate

setting except perhaps from the Church tower (which could not be confirmed during the visual assessment).

13.3.30 In summary, as a Grade I listed building, the Abbey Church of St Mary, Tewkesbury (**BH2**) is a built heritage receptor of high sensitivity. Its exceptional historic and architectural interest, which warrants its designation as Grade I, is principally derived from its historic form and fabric, with its immediate setting making a secondary contribution to its significance. The Application Site forms a small part of the Church's extended setting and makes only a very small positive contribution to the significance of the asset.

**Table 13.4 Summary of Cultural Heritage Receptor Sensitivity**

Receptor	Sensitivity
AR1: Evidence for Medieval ridge and furrow	Low
AR2: Late Prehistoric/Roman settlement activity	Low
AR3: Late Prehistoric/Roman settlement activity	Low
BH1: Church of St Nicholas, Ashchurch	High
BH2: Abbey Church of St Mary, Tewkesbury	High

#### 13.4 ASSESSMENT OF LIKELY SIGNIFICANT EFFECTS

##### Construction

##### Archaeological Receptors

13.4.1 Sources of impacts on archaeological resources during the demolition and construction phases would include:

- Soil stripping and terracing;
- Cutting of new roads, foundations and associated services; and
- General hard and soft landscaping

13.4.2 Archaeological Receptors **AR1**, **AR2** and **AR3** are situated in areas of the Application Site that are proposed for development. The result of this would be the complete removal of these archaeological receptors from the Application Site. As such, a high magnitude effect would arise as a result of the development. This will be an adverse and permanent effect.

13.4.3 However, **AR1**, **AR2** and **AR3** are considered to be of Low sensitivity. As a result, the proposed development would result in a **Minor Adverse** magnitude of effect on these archaeological features.

##### Built Heritage Receptors

13.4.4 There will be no direct effects on any built heritage resources during the demolition and construction phases. Effects can, however, arise through changes to the setting of a heritage resource. At the demolition and construction phases such effects may include:

- Noise pollution, from on-site activity and construction traffic;
- Airborne dust; and
- Additional light-spill.

13.4.5 It is considered that whilst the demolition and construction phases may produce some additional noise, dust and light-spill in relatively close proximity to the receptor **BH1** (which lies c.250m north-east of the Application Site), it is unlikely that this will be perceptible from the asset given its current context adjacent to the Ashchurch for Tewkesbury railway station, industrial development, and the A46. It is therefore considered that the receptor will experience no impact, and thus a **neutral** effect, at the demolition and construction stages.

13.4.6 Built heritage receptor **BH2**, The Abbey Church of St Mary, Tewkesbury lies some 2.5km from the Application Site and will therefore experience no impact, and thus a **neutral** effect, at the demolition and construction phases.

### **Operation**

#### **Archaeological Receptors**

13.4.7 Archaeological receptors **AR1**, **AR2** and **AR3** will have been completely removed from the Application Site at the construction phase of the Proposed Development. The completed development will therefore have no impact, and thus a **neutral effect** on archaeological receptors **AR1**, **AR2** and **AR3**.

#### **Built Heritage Receptors**

13.4.8 The Proposed Development will introduce additional built form into a part of the wider setting of receptor **BH1**, the Church of St Nicholas, Ashchurch, further eroding its historically rural surrounds. However, in this regard, the Application Site is presently considered to make a negligible contribution at most and, whilst no development has yet commenced to the north of the Application Site in respect of application 17/00520/OUT, once this development is completed the Application Site's contribution in this regard will be largely negated. Moreover, as intervisibility between the Application Site and the Church (specifically the Church tower) is limited to northern parts of the Application Site, and the main area of proposed residential development will be toward the south of the Application Site, it is unlikely that there will be any visual impact arising from the Proposed Development. Any additional light-spill, and indeed noise, arising from the operational phase is unlikely to be discernible above that from existing development, including the A46, and the forthcoming consented development to the north of the Application Site. Overall, it is therefore considered that the operational phase of the Proposed Development will have no impact on the historic or architectural special interest of the Church, and therefore a **neutral effect** on receptor **BH1**.

13.4.9 The Proposed Development will introduce additional built form into a small part of the extended setting of the receptor **BH2**, the Abbey Church of St Mary, Tewkesbury, but will not fundamentally change the character of this extended setting. Furthermore, whilst a small number of long-distance views of the asset's tower may be lost or altered by the Proposed Development, this will have no material effect on the ability to appreciate the Church's significance as a landmark ecclesiastical building. Overall, it is considered that at the operational phase, the Proposed Development will have no impact on the significance of, and therefore a **neutral effect** on receptor **BH2**.

## **13.5 MITIGATION AND ENHANCEMENT**

13.5.1 Mitigation during the construction phase comprises a thorough adherence to good site practice measures. These measures are likely to include site hoarding, a construction logistics plan, incorporation of a construction lighting strategy and provision of time limits on construction works to reduce the impacts of noise, dust and light pollution on the nearby built heritage receptors. These measures have already been assumed in the above assessment.

13.5.2 The presence of former Medieval ridge and furrow cultivation (**AR1**) on the Application Site is already sufficiently recorded by the LiDAR data (See Figure 3 of **Appendix 13.1**), the results of aerial photography analysis (Figure 2c of **Appendix 13.1**) and the geophysical survey data (**Appendix 13.2**). These all record the presence, shape and orientation of the different elements of former ridge and furrow on the Application Site. Therefore, no mitigation is recommended for **AR1** relating to the construction phase.

13.5.3 The previous investigations undertaken within the Application Site also identified two areas of late Prehistoric/Roman small-scale settlement activity of local significance (**AR2** and **AR3**). These resources are considered to be of local importance (Low sensitivity) and their loss through development is expected to be mitigated through a programme of archaeological recording (such as excavation).

13.5.4 Upon completion of the development, the archaeological resources would have already been subject to a programme of archaeological works and reporting (if required), undertaken throughout the demolition and construction phase of the development. As such the mitigation measures would have already been implemented; however the reporting, publication and dissemination of these investigations would continue after the completion of the development.

13.5.5 No additional mitigation measures are recommended in relation to built heritage receptors.

**Table 13.5: Summary of Mitigation**

Ref	Measure to avoid, reduce or manage any adverse effects and/or to deliver beneficial effects	How measure would be secured		
		By Design	By S.106	By Condition
1	Adherence to good site practice measures	X		
2	Programme of archaeological works to preserve by record AR2 and AR3			X

## 13.6 CUMULATIVE AND IN-COMBINATION EFFECTS

13.6.1 Whilst this assessment concentrates on the environmental effects on cultural heritage receptors resulting from the Proposed Development, consideration must also be given to the cumulative effects of the Proposed Development in relation to other schemes in its vicinity.

13.6.2 The following sites have been considered for cumulative effects:

- **Tewkesbury Borough Council Application 17/00520/OUT 'Land at Fiddington Ashchurch'** – comprising up to 850 dwellings, which is to be constructed, along with a primary school, local centre, supporting infrastructure, utilities, ancillary facilities, open space, landscaping, play areas, recreational facilities. This consented development is to be accessed via a new access point from the A46 and this same access would be utilised as part of the proposed development.
- **Tewkesbury Borough Council Application 13/01003/OUT 'Land South of the A46 and North of Tirl Brook Ashchurch' (and its subsequent reserved matters/variations and discharge of condition applications)** – comprising a proposed garden centre, retail outlet centre

and ancillary facilities together with associated infrastructure works including access, car parking and landscaping.

13.6.3 No nationally significant archaeological assets are known on the Application Site. The late Prehistoric/Roman settlement activity (**AR2** and **AR3**) and former ridge and furrow cultivation (**AR1**) recorded on the Application Site by the geophysical survey are of local interest. The loss of these archaeological receptors will result in no more than a Minor Adverse magnitude of effect. There is not considered to be any cumulative archaeological effects as a result of the proposed development.

13.6.4 The consented 'Land and Fiddington Ashchurch' development (17/00520/OUT) and 'Land South of the A46 and North of Tirl Brook Ashchurch development (13/01003/OUT) (and its subsequent reserved matters/variations and discharge of condition applications) both introduce urban development into parts of the historically rural and agricultural wider setting of the Church of St Nicholas Ashchurch (receptor **BH1**). However, intervening roads infrastructure and the high level of mature tree planting in the receptor's immediate setting means the contribution these parts of the receptor's wider setting make to the legibility of its historic and architectural special interest is limited. Both developments were therefore assessed as having a negligible adverse impact on the receptor. The Proposed Development will see further built form introduced into the historically rural and agricultural wider setting of receptor **BH1**, but at a further distance from the receptor, situated beyond (and, when they are fully built out, visually screened by) the aforementioned consented developments. It is therefore considered that the combined impact of the developments on the legibility of the historic and architectural special interest of receptor **BH1** will still be negligible, equating to a **negligible** environmental effect.

13.6.5 In respect of The Abbey Church of St Mary (receptor **BH2**), it was assessed that the consented 'Land at Fiddington Ashchurch' development (17/00520/OUT) would interrupt some views of the Abbey Church's tower from land to the east of the development site, resulting in a negligible adverse magnitude of effect. A small number of long-distance views of the asset's tower may also be lost as a result of the Proposed Development. However, when combined, the views affected by both developments still represent only a very small proportion of all available views of receptor **BH2**, and their combined loss will still have an almost imperceptible impact on the ability to appreciate the exceptional historic and architectural interest the Abbey Church possesses. The consented 'Land South of the A46 and North of Tirl Brook Ashchurch' development (13/01003/OUT) and its subsequent reserved matters/variations and discharge of condition application were not found to have any effect on receptor **BH2**. Overall, it is assessed that the effects of the developments combined will still result in no more than a negligible impact to receptor **BH2**, equating to a **negligible** environmental effect.

13.6.6 There will be no interactions between the effects identified to cultural heritage receptors and other topics covered within this ES.

## **13.7 SUMMARY**

### **Introduction**

13.7.1 This Chapter reports the likely significant effects of the Proposed Development in terms of archaeology and built heritage (collectively 'cultural heritage') in the context of the Application Site and surrounding area.

### **Baseline Conditions**

13.7.2 Baseline conditions were established through the findings of a separately prepared Cultural Heritage Statement, geophysical survey and archaeological trial trench evaluation.

13.7.3 These studies identified archaeological receptors that could be affected by the Proposed Development: evidence for Medieval ridge and furrow cultivation, and late Prehistoric/Romano-British occupation. This activity was evident in the geophysical survey data and trial trenches but is of negligible/low archaeological significance and has therefore been assessed to be of Low sensitivity. No archaeological resources situated beyond the Application Site were identified as having the potential to be affected by the Proposed Development.

13.7.4 No designated or non-designated built heritage resources were identified within the Application Site. However, two built heritage resources were identified beyond the Application Site with the potential to be affected by the Proposed Development due to the Application Site forming a part of their respective settings. These receptors comprise the Grade II\* listed Church of St Nicholas, Ashchurch and the Grade I Abbey Church of St Mary, Tewkesbury. Both receptors have been assessed to be of high sensitivity.

#### **Likely Significant Effects**

13.7.5 Archaeological Receptors **AR1**, **AR2** and **AR3** are situated in areas of the Application Site that are proposed for development. The result of this would be the complete removal of these archaeological receptors from the Application Site at the construction phase. It has been assessed that this will not result in a significant environment effect.

13.7.6 It has been identified that, at the construction stage, noise pollution, airborne dust and light-spill may be produced that could adversely affect the way in which a heritage receptor's historic and architectural interest is experienced. However, it has been found that the intervening development between receptor **BH1** and the Application Site, and the intervening distance between receptor **BH2** and the Application Site, mean that it will be unlikely to change the way in which these receptors are experienced. It has therefore been assessed that the construction phase will not result in a significant environmental effect in this regard.

13.7.7 When complete and in operation, the Proposed Development will introduce additional built form into the wider setting of receptor **BH1** and the extended setting of receptor **BH2**. However, it has been found that this will result in no impact on the historic or architectural interest of either receptor. It has therefore been assessed that the operational phase of the Proposed Development will result in no significant environment effect.

#### **Cumulative and In-combination Effects**

13.7.8 No cumulative and in-combination effects have been identified in this Chapter.

#### **Conclusion**

13.7.9 In conclusion, no significant environmental effects will arise with regard to cultural heritage as a result of the Proposed Development.

Table 13.6: Summary of Effects, Mitigation and Residual Effects

Receptor/ Receiving Environment		Description of Effect	Nature of Effect *	Sensitivity Value **	Magnitude of Effect **	Geographical Importance ***	Significance of Effects ****	Mitigation/ Enhancement Measures	Residual Effects ****
<b>Construction</b>									
AR1		Removal through development	Permanent Direct	Low	High	Local	Minor	None recommended	Minor adverse
AR2		Removal through development	Permanent Direct	Low	High	Local	Minor	Archaeological excavation and recording	Minor adverse
AR3		Removal through development	Permanent Direct	Low	High	Local	Minor	Archaeological excavation and recording	Minor adverse
BH1		Noise, airborne dust and light-spill during construction	Temporary Indirect	High	No impact	National	Neutral	None recommended	N/A
<b>Operation</b>									
BH1		Introduction of built form into wider setting	Permanent Indirect	High	No impact	National	Neutral	None recommended	N/A
BH2		Introduction of built form into extended setting	Permanent Indirect	High	No impact	National	Neutral	None recommended	N/A
<b>Cumulative and In-combination</b>									



