



Gravity

Smart Campus

Gravity LDO Environmental Statement

**Volume 1 – Chapter 16:
Cultural Heritage**

16 Cultural Heritage

16.1 Introduction

- 16.1.1 This Chapter reports the likely significant effects of the Proposed Development in terms of Historic Environment in the context of the Site and surrounding area. In particular it considers the likely significant effects of direct and indirect impacts upon both potential archaeological and heritage receptors comprising both designated and non-designated heritage assets.
- 16.1.2 The assessment is supported by the following technical appendices:
- A summary of planning policy and guidance (**Appendix 16.1**);
 - A Historic Environment Desk-based Assessment (DBA) (Wessex Archaeology 2021a; **Appendix 16.2**); and
 - A geophysical survey undertaken Outside ROF fence (Wessex Archaeology 2021b; **Appendix 16.3**).
- 16.1.3 This Chapter has been prepared by Wessex Archaeology. In accordance with Regulation 18(5) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended, a statement outlining the relevant expertise and qualifications of competent experts appointed to prepare this ES is provided in **Appendix 1.6**.

The Proposed Development

- 16.1.4 In general, the Proposed Development entails the construction of a smart campus and community known as 'Gravity Enterprise Zone' on the former site of the ROF closed in 2008. A detailed development description can be found in **Chapter 3**.
- 16.1.5 The parameter plans, which are included as **Appendices 3.1a-g**, show the proposed land divisions between the commercial rail area (including the train station), the energy distribution and management infrastructure area, the residential and community area, the general commercial area (including leisure, education, hotel, residential and energy generation), the sports and leisure area and the open space and biodiversity zones.
- 16.1.6 The commercial rail area forms the core of the Proposed Development and is bordered by open space to the north, north-east and north-west, by the commercial space to the south, and by the energy and sports and leisure areas to the south-east and south-west respectively. There is also a transition zone between the sports and leisure and commercial areas.
- 16.1.7 Overall, the Proposed Development comprises up to 750 homes. Based on the parameter plans, building heights will range between 2 to 5 storeys, with the tallest buildings slightly set back from Woolavington Road (which borders the southern extent of the Site) and surrounded by the 2-3 storey buildings which face the road and form the northern development boundary adjacent to the open space.
- 16.1.8 In addition to the above, the Proposed Development includes the construction of temporary workforce compounds and accommodation for contractors (which will be removed once the development is in Operation), and the potential for the replacement of the rail bridge over the M5. The design of this, should it be required, is currently not understood.

16.2 Policy, Legislation, Guidance and Standards

- 16.2.1 The relevant legislation, policy and guidance are listed below, with details provided in **Appendix 16.1**.

Legislative Framework

16.2.2 The applicable legislative framework is summarised as follows:

- The Ancient Monuments and Archaeological Areas Act 1979;
- National Heritage Act 1983;
- The Protection of Military Remains Act 1986;
- The Treasure Act 1996;
- The Planning (Listed Buildings and Conservation Areas) Act 1990;
- The Hedgerows Regulations 1997 (as amended 2002); and
- The Burial Act 1997.

Planning Policy

16.2.3 The applicable planning policy is summarised as follows:

- The National Planning Policy Framework (NPPF 2021) Section 16: 'Conserving and Enhancing the Historic Environment'; and
- Sedgemoor Local Plan 2011-2032:
 - Policy D2: Promoting High Quality and Inclusive Design;
 - Policy D26: Historic Environment

Guidance

16.2.4 The applicable guidance is summarised as follows:

- Standard and guidance for historic environment desk-based assessment (ClfA 2014);
- Historic Environment Good Practice Advice in Planning Note 2: 'Managing Significance in Decision Taking' (Historic England 2015) (GPA2), which provides information on best practice relating to historic environment policy in the National Planning Policy Framework (NPPF) and National Planning Practice Guide (NPPG);
- Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) 'The Setting of Heritage Assets' (Historic England 2017) (GPA3)) which offers guidance on managing change within the setting of heritage assets;
- Statements of Significance: Analysing Significance in Heritage Assets (Historic England 2019) which explores the assessment of significance of heritage assets;
- Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment (Historic England 2008) which provide a clear framework of what conservation means and how it should be approached;
- Design for Roads and Bridges (DMRB), LA 104 and LA 106 Cultural heritage assessment (Highways England 2020);
- National Heritage Protection Plan (2011); and

- Scheduled Monuments and Nationally Important Non-Scheduled Monuments (DCMS 2013).

16.2.5 The guidance and policy set out, amongst other things, approaches to providing the evidence base to support the assessment as well as guidance on staged approaches to assessment. The guidance issued by Historic England, whilst ostensibly dealing with setting, supports the NPPF position by making it clear that the importance of setting is what it contributes to an asset's significance.

16.3 Consultation

16.3.1 **Table 16.1** summarises the consultation undertaken to date.

Organisation And role	Date and form of consultation	Consultation/Scoping Response	Scheme Responses
Historic England	Awaiting scoping response	The Scoping Response will indicate where the primary issues for assessment lie. Additional and/or supplementary consultation may be undertaken following this, however, consultation prior to the scoping response is likely to illicit the same outcome.	N/A
Sedgemoor District Council	Awaiting scoping response	The Scoping Response will indicate where the primary issues for assessment lie. Additional and/or supplementary consultation may be undertaken following this, however, consultation prior to the scoping response is likely to illicit the same outcome.	N/A
South West Heritage Trust Senior Historic Environment Officer	17/06/2021 via email	Additional consultation undertaken to update the situation on geophysical survey and to explain access issues. No response received as of production of this chapter; additional contact made.	N/A
South West Heritage Trust Senior Historic Environment Officer	28/07/2021 via email to SDC	Mr Steve Membrey submitted a Scoping Opinion note to SDC stating that they are happy with the proposed approach of assessing cultural heritage and heritage impacts following the methodology laid out in the DMRB. Furthermore, Mr Membrey confirmed that they have no objection to the method or scope of the assessment.	The DMRB methodology has been applied to this Chapter.
South West Heritage Trust & Sedgemoor District Council	Various	As part of the Gravity community engagement programme, Gravity, Sedgemoor District Council and South West Heritage Trust recorded the social history of the Site and its previous uses with the help of the local community and the former workforce.	N/A

Table 16.1 Summary of Consultation Undertaken to date

16.4 Assessment Methodology

Scope of the Assessment

- 16.4.1 This assessment has considered to what extent the Proposed Development could have an effect on the heritage significance of designated and non-designated heritage assets within the Site and within a defined Study Area (see below).
- 16.4.2 For the purposes of this assessment, heritage assets are deemed to be both above ground (built heritage) and below ground (archaeological remains). The assessment has considered both direct (physical) and indirect (largely visual) effects as well as cumulative effects upon the following cultural heritage receptors:
- Archaeology – above and below ground, designated or not. Consideration will be given to the potential for unknown (buried) archaeological remains to exist within the Site;
 - Cultural heritage – World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Historic Parks and Gardens, Registered Battlefields and Conservation Areas; and
 - Heritage assets marked or publicised (for example archaeological/heritage trails).
- 16.4.3 As the Proposed Development has the potential to lead to both direct and indirect impacts on heritage assets, all aspects of the historic environment have been considered within this assessment and none scoped out.

Study Area

- 16.4.4 For the purposes of this assessment, a 1 km Study Area was established around the Site from which information from a variety of sources was gathered to provide a sufficient baseline to assess the potential for archaeological remains to be present within the Site.
- 16.4.5 For designated heritage assets, a nominal 5 km Study Area was used to establish the potential or impacts to designated heritage assets from a change in setting. Where deemed appropriate and through the application of professional judgement, assets outside of this Study Area were included within the assessment where these were deemed to be potentially sensitive receptors.

Baseline Data Collection

- 16.4.6 The baseline for the Cultural Heritage Assessment has been gathered in line with the parameters set out during scoping.
- 16.4.7 The assessment has taken account of the information gathered for the new Historic Environment Desk-based Assessment ([Appendix 16.2](#)) and a geophysical survey carried out Outside ROF fence ([Appendix 16.3](#)).
- 16.4.8 The baseline has also considered the archaeological mitigation measures which have already been undertaken as part of the 2017 Planning Consent. This includes mitigation for the loss of historic buildings Within ROF fence.

2032 Baseline

- 16.4.9 The 2017 Planning Consent followed the 2012 remediation consent which concerned a comprehensive programme of Site remediation, which was concluded in November 2020.
- 16.4.10 The 2017 planning consent including the demolition of former industrial buildings, considered mitigation for the loss of archaeological remains through physical impacts, any changes to

these assets' forms part of the 2032 baseline and there will be no additional effects upon any archaeological remains within ROF Fence.

16.4.11 As an additional response to the Gravity community engagement programme, collaborative work with Gravity, Sedgemoor District Council, and South West Heritage Trust, saw the welcoming of the community and former workforce to record the social history of the Site and its previous uses. Open events on Site informed a short film capturing knowledge and memories.

16.4.12 In consideration of archaeology, for the 2032 baseline, there will have been no change in the quantum of archaeology within the Site and Study Area, rather, there may be an increased calibration of our understanding of the nature of the archaeological resource.

16.4.13 Previous Cultural Heritage assessments carried out for the 2017 Planning Consent did not identify any significant effects to designated heritage assets through a change in setting. For the purposes of this assessment, any potential effects in this regard can therefore occur through changes to the built form as set out within the 2017 Planning Consent, for example from taller buildings, or from development within the extended footprint of the Site.

Sensitive Receptors

Summary of heritage assets within the Site and identified sensitive receptors

16.4.14 The following sensitive receptors within the Site have been identified based on the known and recorded resource presented above:

- Potential archaeological remains associated with the prehistoric and Romano-British occupation of the area;
- Potential archaeological remains associated with medieval and post-medieval agricultural practices; and
- As yet unknown potential archaeological remains.

Summary of heritage assets outside of the Site and identified sensitive receptors

16.4.15 An initial assessment of the potential impact of the Proposed Development could have upon the heritage significance of designated heritage assets was carried out as part of the DBA (**Appendix 16.2**). This assessment was undertaken to identify assets which may experience an impact to their heritage significance through a change in their setting. A more detailed methodology is included within the DBA.

16.4.16 The settings assessment undertaken within the DBA used a nominal 5 km Study Area and a Zone of Theoretical Visibility (ZTV) (a more detailed methodology explaining the mechanics of the ZTV is included within **Appendix 16.2**). The ZTV indicated that the low-lying nature of the landscape led to widespread visibility in the surrounding area. However, as the ZTV uses a 'bare earth' scenario, it was clear from the Site visit that there was intervening vegetation and buildings between the Site and many of the identified assets within 5 km.

16.4.17 However, the Site visit did indicate that the Site shared visibility with the Scheduled Monument at Brent Knoll approximately 7 km to the north which, as a result, has been scoped into further assessment.

16.4.18 The following designated heritage assets have been identified as being potentially sensitive receptors to the Proposed Development based on the results of the DBA (see **Figure 3, Appendix 16.2**):

- The Grade I listed Church of St Michael and the Angels, Puriton (NHLE 1344664);
- The Grade II listed Manor Farmhouse, Puriton (NHLE 1060137); and
- The Scheduled Monument Brent Knoll hillfort and associated field system (NHLE 1008248).

16.4.1 Based on the detailed assessment presented in the DBA (see **Appendix 16.2**) the remaining assets within the 5 km Study Area were scoped out of further assessment. The locations of designated heritage assets are shown on **Figure 3** of **Appendix 16.2**.

16.4.2 Assessment of Significance

16.4.3 The methodology used within this assessment considers the following:

- The heritage significance of a receptor and its sensitivity to an impact;
- The magnitude of change; and
- The significance of effect upon the heritage significance of receptors.

16.4.4 The ES identifies and assesses potential direct and indirect impacts upon both archaeological and heritage receptors. Potential effects upon the archaeological and heritage receptors arising from the Proposed Development can be adverse or beneficial; short or long term; permanent or temporary and cumulative/in combination with other planned schemes.

Direct Impacts

16.4.5 The assessment of direct impacts considers physical effects upon features of heritage interest, whether known or unknown Sites or potential Sites, consisting of archaeological remains and/or elements of built heritage, which are in danger of being disturbed or destroyed. Direct impacts occur during the demolition/construction phase and are typically permanent and irreversible.

Indirect impacts

16.4.6 Paragraph 194 of the NPPF requires that an applicant should provide a description of the significance of any heritage assets affected by any development and the contribution their setting makes to that significance.

16.4.7 Setting consists of 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 the significance of that asset or may be neutral.

16.4.8 Therefore, the importance of 'setting' is in what it contributes to the significance of an asset, simple intervisibility or proximity to a Proposed Development is not considered to constitute harm in itself, and 'setting' is not a designation.

16.4.9 Setting can be tangible, such as a defined boundary, or intangible, such as an atmosphere or ambience. Setting is not simply defined within a visual envelope but can include an archaeological or historic context, which may not be visually apparent.

16.4.10 When assessing the potential for indirect impacts, the primary concern is the degree to which the heritage significance of an asset, or the ability to appreciate and understand that significance, is being impacted.

16.4.11 Indirect effects can occur during both the construction and operation phase and can be both permanent and temporary.

Significance Criteria

16.4.12 Significance, in heritage terms, is defined in national planning policy as:

'The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural artistic and historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.'

16.4.13 In order to avoid confusion with significance of effect, which is set out below, significance in relation to the value of a heritage asset will be referred to in this assessment as 'heritage significance'.

16.4.14 There is no industry standard method for assessing how significant heritage assets are, however, there are criteria set out within the Design Manual for Roads and Bridges (DMRB; 2020) as well as guidance set out within Statements of Heritage Significance (Historic England 2019) which are widely used across the industry. DMRB sets out a series of levels of significance of an asset which for this assessment has been adapted, with reference to Historic England guidance and the NPPF glossary, to encompass both designated and non-designated heritage assets.

Heritage Significance	Description
High	World Heritage Sites, Scheduled Monuments, Grade I and II* Listed Buildings, Registered Battlefields, Registered Parks and Gardens, and non-designated assets of equivalent heritage significance which are considered to be potentially nationally important. Grade II heritage assets that can be shown to have exceptional qualities in their fabric or historical associations, especially where they are of national importance.
Medium	Grade II Listed Buildings, regionally important archaeological features and areas (as defined in the Historic Environment Record). Grade II Registered Parks and Gardens. Conservation Areas, which are considered regionally important.
Low	Sites and features noted as locally important in the Historic Environment Record. Other, non-designated features of cultural heritage significance.
Negligible	Assets compromised by poor preservation and/or poor contextual associations. Or very common archaeological features / buildings of little or no value at local or other scale.

Table 16.2 Levels of Heritage Significance

16.4.15 Whilst the categorisation of Listed Buildings by Historic England implies different levels of heritage significance, as reflected in the table above, all Listed Buildings are afforded the same level of legal protection.

16.4.16 While this table nominally sets out heritage significance levels, in all instances professional judgement will be used in determining heritage significance. Where assets are placed in a different category to those set out above, a rationale and justification will be made explicit in the text, where relevant.

Magnitude of Change

16.4.17 Magnitude is a means to measure the nature of a predicted change to the heritage significance of an asset and is broken down in Table 16.3.

16.4.18 Direct impacts are permanent, as the loss of or damage to archaeological receptors cannot be repaired, replaced or recreated. Indirect impacts can occur through changes in setting (arising from visual intrusion, etc.) which may cause a reduction in the contribution that the setting

makes to the heritage significance of an asset, so that there is an impact (reduction) in the overall heritage significance of the asset, or that the heritage significance can no longer be appreciated or experienced.

Level of Magnitude	Definition
Very High	Total loss of or major alteration to a Site, building or other feature (e.g., destruction of archaeological feature, demolition of a building). Blocking or severance of key visual or other relationship. Disassociation of an asset from setting or other major change in setting, so as to cause wholesale loss of heritage significance for a heritage asset and completely prevent the heritage significance of an asset from being appreciated and/or experienced.
High	Major physical damage to or significant alteration to a Site, building or other feature. Extensive change (e.g., loss of dominance, intrusion on key view or sightline) to the setting of a Scheduled Monument, Listed Building or other feature registered as nationally important, which may lead to a major reduction in the contribution of that setting to the heritage significance of the asset so that the asset loses heritage significance, and a major reduction in the ability to experience and/or appreciate that heritage significance.
Medium	Damage or alteration to a Site, building or other feature. Encroachment on an area considered to have a high archaeological potential. Change in setting (e.g., intrusion on designed sight-lines and vistas) to monuments / buildings and other features, which may lead to a moderate reduction in the contribution of that setting to the heritage significance of the asset and a consequent change/reduction in the ability to experience/appreciate that heritage significance.
Low	Minor damage or alteration to a Site, building or other feature. Encroachment on an area where it is considered that low archaeological potential exists. Minor change in setting (e.g., above historic skylines or in designed vistas) of Monuments, Listed Buildings, Sites and other features, which may lead to a small reduction in the contribution the setting makes to the heritage significance of the heritage asset, resulting in limited loss of heritage significance. Limited change in or reduction of the ability to experience or appreciate the heritage significance of an asset.
Negligible	No physical effect. Slight or no change in setting, with no or very limited change in the contribution that setting makes to the heritage significance of the asset. No or minimal change in the ability to experience or appreciate the heritage significance of the asset.

Table 16.3 Magnitude of Change Criteria

Significance of Effect

16.4.19 The significance of an effect in EIA is binary, either an effect is significant, or it is not. This is different to the (heritage) significance of a heritage asset, the criteria for which is set out above.

16.4.20 Effects that are deemed to be significant for the purposes of this assessment are those that are described as being of a moderate, major or substantial (beneficial or adverse) level. The significance of any effect can be arrived at by assessing heritage significance against magnitude as shown in **Table 16.4**.

Magnitude of Change	Sensitivity of Receptor			
	High	Medium	Low	Negligible
Very High	Major	Major	Moderate	Negligible or No Effect
High	Major	Major	Moderate	Negligible or No Effect
Medium	Moderate	Moderate	Minor	Negligible or No Effect
Low	Minor	Minor	Minor	Negligible or No Effect
Negligible	Negligible or No Effect	Negligible or No Effect	Negligible or No Effect	Negligible or No Effect

Table 16.4 Significance of Predicted Effects

16.4.21 Potential effects that are assessed as 'Minor' or 'Negligible or No Effect' as shown on the matrix are considered to be 'Not Significant' in terms of the EIA Regulations.

16.4.22 An alignment of how 'substantial' and 'less than substantial harm' equates to effects as assessed in this Cultural Heritage chapter only, is provided within **Appendix 16.1**.

Limitations

16.4.23 Data used to compile this assessment consists of information derived from a variety of sources, only some of which have been directly examined for the purposes of this study. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.

16.4.24 The Historic Environment Record (HER) is not a record of all surviving heritage assets, but a record of the discovery of a wide range of archaeological and historic components of the historic environment. The information held within it is not complete and does not preclude the subsequent discovery of further elements of the historic environment that are, at present, unknown.

16.4.25 This assessment was written in June and July 2021. Due to the COVID 19 pandemic, a number of repositories were closed to the public to help combat the spread of the disease. Every effort has been made to mitigate this through the use of available online sources.

16.5 Baseline Conditions

Current State of the Environment

Site description

16.5.1 The Site is located between the villages of Puriton and Woolavington, approximately 6 km north-east of the town of Bridgwater, Somerset.

16.5.2 The Site mainly comprises the remnants of the former Royal Ordnance Factory (ROF) Puriton which has been remediated. Many of the former buildings have been removed as part of the remediation.

- 16.5.3 The remainder of the Site to the south and east of the ROF Site is primarily comprised of agricultural fields subdivided with mature hedgerows and used as either pasture or grassland. The area to the west mainly comprises the route of a former railway line into the Site with some agricultural fields on either side, while to the north a spur is comprised of a series of reed beds.
- 16.5.4 The topographic elevation of the Site varies between 50 m above Ordnance Datum (aOD) on a ridge of high ground to the south, sloping down to c. 4.5 m aOD to the north.
- 16.5.5 The underlying geology is mapped as Langport Member, Blue Lias Formation, and Charmouth Mudstone Formation interbedded Limestone and Mudstone which are overlain, across most of the Site, by superficial Tidal Flat Deposits (British Geological Survey online).

Archaeological and historical background to the locality

- 16.5.6 The Site is situated at the edge of two distinct environments, the Somerset Levels to the north and a prominent topographic ridge which overlooks the River Parrett and tidal flats further to the south. The Somerset levels have been subject to continual cycles of sea regression and transgression throughout prehistory which will have been reflected in the human activity within the area. (It should be noted that detailed flood modelling demonstrating low risk of inundation has been completed as part of the hydrology baseline and evidence base and it is important to note that no flood events have affected the Site since its construction).
- 16.5.7 The overall low elevation of the area coupled with its proximity to the sea has resulted in areas of slightly higher topographic prominence to be the focus for settlement and activity from the earliest prehistoric period onwards.
- 16.5.8 Although the earliest evidence for human activity in the Study Area dates to the Mesolithic period (PRN 10711), evidence for consistent occupation is first visible from the Bronze Age onwards.
- 16.5.9 A potential Bronze Age settlement is recorded by the Historic Environment Record (HER) immediately adjacent to the Gravity Link Road, south of Woolavington Road, which was identified during a geophysical survey (PRN 42550). The anomalies identified during the survey included a rectilinear enclosure and an L-shaped enclosure which are consistent with similar features found elsewhere in the region.
- 16.5.10 Excavations carried out within the Site have uncovered a rectangular ditched enclosure dating to the Early to Middle Bronze Age (Wessex Archaeology 2012d) while further evidence of Bronze Age activity is recorded approximately 680 m south of the Site where a single crouched burial was found in association with Beaker pottery (PRN 28484).
- 16.5.11 Evidence for occupation and activity during the Iron Age was also uncovered during excavations within the Site (Wessex Archaeology 2020) through an enclosure defined by a substantial curvilinear ditch. Pottery recovered from the ditch dated the deposits to the Middle to Late Iron Age and while it is thought there may have been an opposing ditch, forming an entrance, no such feature was uncovered.
- 16.5.12 Somerset became important during the Iron Age and Romano-British periods for the production of salt with possible evidence for this activity recorded by the HER approximately 350 m to the south of the Site (PRN 30211). This interpretation is, however, tentative as the features uncovered during archaeological investigations are more likely to have been associated with pottery production.
- 16.5.13 A relatively substantial Roman settlement was uncovered during the construction of the M5 motorway approximately 800 m to the south-west of the Site. The excavations here found stone paving, wall foundations and pottery including Samian ware and indicated that the settlement extended well beyond the excavation limits (PRN 10705).

- 16.5.14 Within the Site, recent excavations uncovered a substantial masonry wall which was constructed from randomly coursed, large angular limestone blocks and slabs in association with a rubble filled trench which contained 3rd or 4th century AD Roman pottery (Wessex Archaeology 2020). The presence of the unabraded pottery was suggestive of a nearby settlement with a nearby field system also found during excavation indicating the Study Area was widely occupied during the Romano-British period.
- 16.5.15 There is no evidence recorded within the HER for any activity within the Site or the Study Area during the Anglo-Saxon period, however, the record of the settlements of Puriton and Woolavington within the Domesday Survey of 1086 indicates their establishment prior to the Norman Conquest in 1066.
- 16.5.16 Both settlements are of a medium size for the time, having a population of between 80 and 100, with Woolavington noted as being within the largest 40% of settlements in the country at the time. They are located on islands of slightly higher topography continuing a pattern established in the prehistoric and Romano-British period, this is perhaps best appreciable in Puriton where the settlement's church is located on a discernible raised platform.
- 16.5.17 The centre of each settlement is focused on their parish churches, both of which were constructed in the medieval period. The now Grade I listed Church of St Michael (NHLE 1344664), located approximately 480 m south-east of the Site was constructed in the 13th century, although documentary evidence suggests that the church was founded in 1113 (Dunning 2004). Documentary evidence also indicates that the churchyard has remained in use since the founding of the church.
- 16.5.18 In Woolavington, the Grade I Listed Church of St Mary (NHLE 1060144), located approximately 470 m to the east of the Site, was originally constructed in the 11th century with extensions and alterations throughout the 13th to 15th centuries and extensively restored in the late 19th century.
- 16.5.19 Beyond the settlement, there was an increase in the reclamation of parts of the Somerset levels which had been affected by a substantial tidal inundation during the earlier parts of the Anglo-Saxon period. This reclamation process allowed for the improvement of the land immediately outside of the settlement centres which were then used for agricultural purposes. The Site lies in one of these areas with evidence still remaining in the landscape for the medieval open field system characterised by earthworks remaining within the south-eastern section of the Site in fields adjacent to Woolavington Road.
- 16.5.20 Approximately 600 m west of the Site, the HER records the extent of the medieval borough of Caput Montis (PRN 10703) which is thought to have been established before 1159 by the De Combers who were lords of the Puriton Manor. The settlement was located on a promontory projecting to the west and comprised two parallel east-west roads with crossroads that formed a simple grid, a possible chapel and port along with the now scheduled remains of its Motte and Bailey Castle (NHLE 1019291). The remains of the castle comprise part of a mound and three broadly concentric mounds which form the earthwork of a motte with two baileys.
- 16.5.21 Between the 16th and 19th centuries, the fertile area continued to be intensively farmed and much of the historic landscape in the area surrounding the Site is a product of the agricultural activities from this period. The 1842 Puriton Tithe map shows the surrounding area was subdivided into numerous, narrow strips or strip lynchets, farmed by different occupiers, and broadly aligned north to south. Historic mapping from this time also shows the extensive network of rhynes, although some of these were likely established at an earlier date.
- 16.5.22 Beyond the agricultural landscape, the settlements at Puriton and Woolavington formed the majority of the character during this period which is evidenced by the number of now listed buildings which trace their origins to the 16th, 17th, 18th and 19th centuries. Examples within the Study Area include the Grade II listed Manor Farmhouse (NHLE 1060137), located approximately 250 m west of the Site on the edge of the village of Puriton and the mid-18th century Causeway Farmhouse (NHLE 1344687) in the centre of the village of Woolavington.

- 16.5.23 In Woolavington, there is perhaps a more visible post-medieval historic character as a number of non-designated historic buildings were also constructed during this period including the late 17th century Former White Lion (PRN 36459) and Apple Tree Cottage (PRN 334753).
- 16.5.24 In the late 1930s, the Site was selected as a location for a Royal Ordnance Factory to prepare munitions for the imminent outbreak of war primarily due to its relative remoteness, its proximity to coal and chemical supplies and the ready availability of clean water. Due to the secretive nature of the operations being undertaken, the facility was identified only by its code number: ROF 37.
- 16.5.25 The factory was highly specialised and purpose-built comprising approximately 500 buildings by 1941. By 1943, the workforce at the factory comprised over 2,500 employees, many of whom were housed in 'pre-fabs' in the nearby villages.
- 16.5.26 The factory's main purpose was to manufacture components which were transported off Site to other factory Sites for assembly.
- 16.5.27 Following the end of the Second World War, production was briefly halted in favour of producing chemicals and plastics in addition to manufacturing pre-cast concrete houses to help home the millions of people displaced in the cities across the country.
- 16.5.28 Ordnance production recommenced in the 1950s as a result of the escalating tensions of the Cold War, in particular the Korean War in the early 1950s, which led to a substantial rearmament programme. The Site remained in use until 2007, after which it was decommissioned and many of the former buildings removed leaving only a handful of extant structures focused along the southern extent of the factory Site.

Geophysical Survey

- 16.5.29 A geophysical survey was undertaken across available sections of the Site outside the ROF fence (**Appendix 16.3**). Due to constraints including existing Gravity Link Road construction boundaries and ecological considerations, not all of the area was accessible, however, much of the eastern and southern sections have been completed.
- 16.5.30 The survey has indicated the presence of a number of anomalies considered to be of archaeological origin.
- 16.5.31 Within the section bounded by the Eastern and Western Approach Road, an area of fragmented positive anomalies are consistent with enclosure ditches.
- 16.5.32 Within the north-eastern section Outside ROF Fence, the survey identified a network of interconnected linear and recti-linear positive anomalies on a broadly north-east - south-west alignment and are likely to represent a series of further enclosure ditches. Towards the northern end, a positive 'keyhole' shaped anomaly has been identified that may also indicate an enclosure (**Figure 3; Appendix 16.3**).
- 16.5.33 Given the size, shape and known archaeological context of the surrounding area, it seems likely these anomalies relate to the earlier occupation of the area during the prehistoric and Romano-British periods.
- 16.5.34 The survey also returned anomalies consistent with medieval/post-medieval ridge and furrow agricultural in the field immediately adjacent to the village of Woolavington (**Figure 3; Appendix 16.3**).
- 16.5.35 In the central section of the Site outside the ROF fence, the survey has indicated that the majority of the land has been disturbed by previous activity with likely deposits of made ground in and around the entrance to the former ROF.

16.5.36 The remainder of the survey did not identify any anomalies consistent with any archaeological remains.

2032 Baseline

16.5.37 The 2032 Baseline assumes the full implementation of the 2017 Planning Consent (excluding safeguarded land)

16.5.38 The 2017 Planning Consent included an assessment of Cultural Heritage for which all mitigation measures have been undertaken in relation to built heritage (building recording for all buildings associated with the ROF prior to their demolition) and archaeology (intrusive archaeological excavations to undertake mitigation for their loss through preservation by record) and thus no further consideration is made to any potential impacts to these elements of the Historic Environment.

16.5.39 The accompanying 2013 ES, 2013 ES update and 2017 ES Addendum also identified no impacts to designated heritage assets through a change in setting.

16.5.40 The 2032 baseline also includes four 'approved developments' which are to be considered as having been implemented and fulfilled by 2032 and includes the Hinkley C consented overhead line. In respect of Cultural Heritage, these developments have the potential to result in a change to the setting of some of the designated heritage assets identified as sensitive receptors.

16.5.41 The 'approved developments' are as follows:

- Application 42/20/00014 which comprises an outline application for the erection of up to 120 dwellings with public open space, structural planting and landscaping, surface water flood mitigation and attenuation, and vehicular access point from Woolavington Road.
 - This application is located on the eastern edge of the settlement at Puriton and will effectively in-fill development up to the completed Gravity Link Road. While this will remove elements of the former rural landscape outside of the village, this will not lead to a change in setting for any designated heritage assets.
 - As a result, this development is not considered to be a material consideration in any assessment of effects in combination with the Proposed Development.
- Application 54/19/0008 comprise a hybrid (full and outline) application for the erection of 100 dwellings including 30 affordable homes and associated infrastructure. Outline application with some matters reserved for the erection of up to 75 dwellings and associated infrastructure.
 - This application is located to the south of Woolavington and while this will remove elements of the former rural landscape outside of the village, this will not lead to a change in setting for any designated heritage assets. A conclusion supported by the submitted Historic Environment Assessment (AC Archaeology 2019).
 - As a result, this development is not considered to be a material consideration in any assessment of effects in combination with the Proposed Development.
- Application 54/20/0009 comprises an outline planning application with some matters reserved for the erection of up to 125 dwellings with public open space, landscaping, sustainable drainage system (SuDS), formation of vehicular access and off site improvements.
 - This application is located on the south-eastern periphery of the settlement of Woolavington and while it may remove some of the former rural landscape outside of the village, it will not lead to a change in setting for any designated heritage assets. A

conclusion supported by the submitted Archaeology and Built Heritage Assessment (Pegasus Group 2018).

- As a result, this development is not considered to be a material consideration in any assessment of effects in combination with the Proposed Development.
- Application 54/20/0010 comprises an outline application with some matters reserved, for the demolition of stable buildings and the erection of up to 95 dwellings with public open space, landscaping and sustainable drainage system (SuDS), vehicular access point from Woolavington Road and the erection of a double garage with associated access at Westfield Farm.
- This application is located to the south of Woolavington Road on the western periphery of the settlement at Woolavington. While it may remove some of the former rural landscape outside of the village, it will not lead to a change in setting for any designated heritage assets. This is a conclusion supported by the submitted Archaeology and Built Heritage Assessment (Pegasus Group 2019).

16.5.42 None of the 'approved developments' have any significant impact to the heritage significance of any designated heritage assets.

16.5.43 Some of the 'approved developments' may result in the loss of archaeological remains within their development footprint (if present). This would unlikely result in alteration to the presence, nature or significance of the archaeological resource within the Site, unless the remains that are lost as part of the 'approved developments' are directly associated with archaeological remains within the Site and contribute to the understanding of the remains within the Site (if any).

16.5.44 However, it must also be noted that, the implementation of the 'approved developments', and the assumed appropriate mitigation undertaken following their consent, may uncover archaeological remains and thus improve our understanding of the area's archaeological resource and allow for better and more accurate interpretations.

16.5.45 . As archaeological remains are an irreplaceable resource, the 2032 baseline would likely lead to the loss of the as yet unknown archaeological resource within the Site and within the footprint of the 'approved developments'.

16.6 Embedded Mitigation

16.6.1 The nature of the Proposed Development and the construction methodologies required means that there are no design solutions which can mitigate the potential impact on buried archaeological remains.

16.6.2 For the basis of this assessment, a conservative scenario has been therefore assumed whereby any below ground archaeological remains will be entirely lost.

16.6.3 With regard to the potential for effects arising from a change in the setting of a designated heritage asset through the construction of the Proposed Development, the potential large scale of the units required are critical to its successful implementation. In order to minimise the visual intrusion into the landscape and to the background setting of especially the listed church [NHLE 1344664] and farmhouse [NHLE 1060137] which currently mainly comprises agricultural hinterland, the spatial strategy for the Site ensures the tallest buildings are located further to the north with building heights stepping down towards the areas of existing settlement at Puriton and Woolavington. The design code will also consider materials and design measures to reduce effects. While this embedded mitigation cannot preserve the loss of the agricultural hinterland within the Site, the stepped approach can lessen the visual intrusion caused by it which could lead to a change in the wider setting of the church and farmhouse.

- 16.6.4 The proposed landscaping strategy would likely, in the long term, help to reduce and filter views of the Site which will serve to alleviate somewhat any effects to designated heritage assets. However, this depends on the final design of the landscaping strategy.

16.7 Assessment of Likely Effects

- 16.7.1 This section sets out the identification and evaluation of the key potential effects of the Proposed Development with reference to the historic environment taking account of incorporated mitigation embedded within the design.

Demolition and Construction

Direct Impact - Archaeology

- 16.7.2 Any adverse effects to buried archaeological features would be permanent and irreversible in nature. Even in areas where the scale of intrusive groundworks may be relatively small, the magnitude of impact on an archaeological asset may be high.
- 16.7.3 The construction phase of the Proposed Development has the potential to result in direct permanent, adverse effects on archaeological remains within the Site. Activities associated with the Proposed Development which could have below ground effects comprise:
- Demolition of buildings and foundation removal (noting the majority has been completed within the main fenced Site);
 - Creation of a development platform (noting the current consents for this);
 - Excavation of trenches/piling for foundations;
 - Installation of services and utilities; and
 - Hard and/or soft landscaping.
- 16.7.4 The potential for archaeological remains to be present outside ROF fence is high, based on the balance of evidence provided from previous archaeological investigations.
- 16.7.5 Expert analysis determines it is likely that any remains encountered would relate to the occupation of the landscape during the prehistoric period and the Romano-British period as demonstrated through the evidence gathered from the geophysical survey. Any such remains would derive their heritage significance from their archaeological interest and the information their excavation would reveal about the occupation of the landscape and the people within it.
- 16.7.6 There is also a high likelihood for encountering remains from the medieval and/or post-medieval agricultural practices given their recorded presence within the Site and the Study Area and from the results of the geophysical survey. Any such remains encountered would be of low significance as while they indicate previous landscape use, there is unlikely to be any substantial additional information from their archaeological remains which could add to the current knowledge base.
- 16.7.7 Given the previous use of the landscape for primarily agricultural purposes, any remains are unlikely to have been disturbed and are likely to be well preserved as demonstrated through previous archaeological investigations.
- 16.7.8 Based on the available information, the heritage significance of these archaeological remains is likely to range from Negligible to Medium. The high assumed impact of the Proposed Development would therefore result in effects as ranging from **Negligible to Major Adverse Effect**, which (at the top of the range) is significant, prior to mitigation.

Indirect Impacts – Built Heritage

- 16.7.9 While there will be some additional noise and visual intrusion arising from the presence of cranes, vehicles, lighting etc. within the Site and accessing the Site, these changes are temporary, limited to working hours and for the duration of the construction programme. These will not have any significant effect on the heritage significance of any designated heritage assets through a change in setting.
- 16.7.10 Specific indirect effects on the heritage significance of heritage assets within the Site and the Study Area are considered below in relation to operation (and final built form) of the Proposed Development.

Operation

Direct Impacts

- 16.7.11 There will be no additional direct impacts during the operational phase of the Proposed Development as no further intrusive ground works or building demolitions are anticipated beyond the demolition and construction phase.

Indirect Impacts

- 16.7.12 Indirect impacts to built heritage assets are caused through the potential for the heritage significance (or the ability to appreciate and understand that significance) of heritage assets to be changed (diminished or otherwise harmed) through a loss of the contribution that their settings make to their heritage significance, as a result of development within that setting. Indirect impacts can be temporary and reversible upon decommissioning, however, in the case of the Proposed Development as decommissioning is not planned, these effects will be permanent.
- 16.7.13 The locations of the designated heritage assets identified below can be seen on **Figure 3** in **Appendix 16.2**.

The Grade I listed Church of St Michael and All Angels, Puriton (NHLE 1344664)

- 16.7.14 The asset is an Anglican parish church located within the centre of the village of Puriton, approximately 470 m to the west of the Site. Its earliest origins date back to the 13th century with later 14th and 15th century additions and was extensively renovated in the late 19th century. Constructed from coursed and squared rubble in an Early English and Perpendicular architectural style, the church retains some of its original architectural detailing externally along with a number of original internal features.
- 16.7.15 The setting of the asset is defined by its surrounding churchyard which sits on an area of relative topographic prominence within the centre of the village. This relative prominence is best appreciated from the adjacent street 'Rye' when moving towards the church from the south. The churchyard is enclosed on all sides by adjacent development and vegetation with extremely limited visibility to the landscape beyond.
- 16.7.16 The asset derives its significance primarily from its historic and architectural interest which is vested in the physical building, the architectural quality of the original church and the visible signs of its evolution over time which can be seen in the differences in building styles and architectural detailing.
- 16.7.17 In addition, the immediate setting of the churchyard makes an important contribution to its significance allowing the architectural and historic interest to be best appreciated while the wider village centre also make an important contribution to its significance allowing it to be appreciated as one of the settlement's focal points.

- 16.7.18 Although there are small gaps in the surrounding vegetation which allow for glimpsed views out to the wider landscape, these are limited and make no contribution to how the church is appreciated and thus no contribution to its significance.
- 16.7.19 There will, therefore, be no effect upon the significance of the asset through a change in setting from the operation of the Proposed Development and thus the magnitude of effect will be Negligible.
- 16.7.20 The church is an asset of High heritage significance with the magnitude of impact from the Proposed Development assessed as Negligible, resulting in a **Negligible or No Effect**, which is not significant.

The Grade II listed Manor Farmhouse, Puriton (NHLE 1060137)

- 16.7.21 The asset is a farmhouse of 16th century origin located approximately 250 m to the west of the Site. It is constructed from rough cast stone with a pantile roof and is arranged in a cross-passage plan. The farmhouse was altered and extended in the 18th, 19th and 20th centuries giving it a more irregular layout. It retains some of its original architectural detailing which is best preserved internally following the later alterations. Externally, the main visible elements on the elevation facing the road are 19th century casement windows while the roof structure and roof beams date to the 16th century.
- 16.7.22 The asset's setting is principally defined by the village in which it lies which is characterised by a mixture of buildings of varying architectural types which are both historic and modern. Beyond the village, the asset's setting comprises agricultural land within the immediate hinterland of the settlement.
- 16.7.23 The asset derives its significance primarily from its historic and architectural interest which is derived from its remaining historic fabric from the 16th century and from the appreciable evolution the farmhouse has undergone through the later alterations.
- 16.7.24 In addition, significance is also drawn from its important relationship with the agricultural fields at the edge of the settlement as the farmhouse has been a key building in the village during the post-medieval period with crops brought in from the immediate hinterland. That relationship is still appreciable both in plan and on the ground where the importance of its location can be understood.
- 16.7.25 The Proposed Development will result in the removal of the fields immediately outside of the village centre for which the asset shares a relationship. Their removal will therefore result in a reduction of the ability to appreciate or understand the significance of the Farmhouse through a loss of the historically associated land.
- 16.7.26 The scale of this impact is to be considered in conjunction with the contributing elements of the asset's significance, namely that the majority of its significance is derived from its historic and architectural interest. That historic and architectural interest is best appreciated in close proximity from the main road where the principal elevation is visible. The asset's primary setting is also best appreciated from close proximity where the evolution of the village is most visible.
- 16.7.27 The impact, therefore, will be upon only one element of the asset's significance, leaving the primary interest unchanged, which as a result leads to the magnitude of the anticipated impact considered to be Low.
- 16.7.28 The farmhouse is an asset of medium heritage significance with the magnitude of impact from the Proposed Development assessed as Low, resulting in a **Minor Adverse Effect**, which is not significant.

The Scheduled Monument Brent Knoll hillfort and associated field system (NHLE 1008248)

- 16.7.29 The hillfort is located approximately 7 km to the north of the Site and is situated on an island of high topographical prominence overlooking the surrounding landscape and out towards the Bristol Channel. The asset itself comprises a low, earthwork rampart approximately 1 m in height which encloses an area of approximately 1.6 ha, although some of the internal area has been disturbed by medieval quarrying.
- 16.7.30 Archaeological investigations have, however, uncovered the remains of a Roman building and while the fort itself is considered to be of Iron Age origin, some of the outer ramparts are probably Romano-British in date.
- 16.7.31 The setting of the fort is defined by its prominent position which offers views to and from the surrounding landscape.
- 16.7.32 The asset derives its significance primarily from its archaeological interest and through the information the archaeological remains could yield relating to the occupation and use of the fort from the Iron Age through to the Romano-British period. There is also an archaeological potential for later activities from the medieval period through to the 20th century.
- 16.7.33 The setting of the asset makes a positive and important contribution to its significance. The topographical prominence of the island upon which it sits was key to the selection of that location for the hillfort both as a defensive structure and as a reflection of its status. That prominence and the understanding of it is two-way, with views from and to the hill fort, of importance in understanding its significance.
- 16.7.34 Whilst the Proposed Development will prevent some visibility towards the asset from a limited number of locations (such as along Woolavington Road), the asset will continue to be visible from the vast majority of the surrounding landscape and the appreciation of its prominence and/or the understanding of its strategic position will remain unaltered. The availability of views from Woolavington Road is incidental and does not have a specific relationship with the asset. The importance of the hillfort in this respect lies in the availability of views from it, and its presence in views towards it is best realised at closer ranges.
- 16.7.35 Similarly, while the Proposed Development will be visible from the asset, the nature of development of the area in the past 50 years has seen a substantial increase in the number of large industrial units constructed within the surrounding landscape. The Proposed Development will therefore not represent a novel intrusion, rather a continuation along a similar vein and, over time, will be no more noticeable than the existing modern developments to the west and south-west of the Site adjacent to the M5.
- 16.7.36 While there will be a change in the setting of the asset, the scale of change within the landscape coupled with the primary significance of the asset deriving from its archaeological interest (which is not diminished), will not lead to any harm to its significance from the Proposed Development through a change in setting, and thus the magnitude of effect will be Negligible.
- 16.7.37 The hillfort is an asset of High heritage significance with the magnitude of impact from the Proposed Development assessed as Negligible, resulting in a **Negligible or No Effect**, which is not significant.

16.8 Further Mitigation

Direct Impacts – Archaeology

- 16.8.1 It is considered that the Proposed Development has the potential to affect subsurface archaeological remains, specifically on the southern lands which lie outside of the existing

main Site fence line. It is proposed to mitigate any potential effects through the implementation of an appropriate programme of archaeological works which will permit any remains to be investigated and recorded (leading to preservation by record).

16.8.2 In order to achieve this, the following approach is recommended which should be undertaken in phases as occupiers come forward and specific details on impacts are known:

- a programme of trial trenching to be undertaken post adoption of the LDO, but pre-commencement, to further establish the presence and significance of any as yet unknown archaeological remains.
- a programme of archaeological mitigation, to include Strip, Map and Record and/or watching brief depending on the scale and significance of any archaeological remains. The requirement for this element, and its scope, will only be fully understood once the trial trenching has been undertaken and the results carefully analysed in conjunction with the data gathered for the DBA and during the geophysical survey.

16.8.3 The above provides an indicative programme only and would be subject to consultations with the South West Heritage Trust. This mitigation is secured within the Compliance Form.

Indirect Impacts – Built Heritage

16.8.4 The Parameter Plan indicates that the section of the Site closest to the Grade II listed Manor Farmhouse (assessed as experiencing a Minor Adverse Effect) is to be occupied with up to 50% buildings with the remainder blue and green infrastructure, a tree nursery, community use, sports, leisure or associated infrastructure. This allows an opportunity to design this part of the Site to accommodate the built structures in a way that could mitigate, as much as possible, the alteration of the rural landscape which forms part of the wider setting of the asset. This is also in line with the 'Puriton Edge' Design Drivers outlined in the 2021 Design Guide.

16.8.5 This mitigation is secured within the Compliance Form.

16.9 Residual Effects

16.9.1 The magnitude of effects during the demolition, construction and operational phases following the application of the identified mitigation measures (i.e. the residual effect) has been assessed with reference to the extent, magnitude and duration of effect; receptor sensitivity and compatibility with environmental policies.

Construction

Direct Impacts – Archaeology

16.9.2 Through the implementation of an appropriate mitigation strategy, agreed in consultation with the Planning Archaeologist for the South West Heritage Trust, which will allow for the excavation and preservation by record of identified archaeological assets, the reported effects on archaeological assets will be reduced as set out below:

- The **Minor Adverse Effect** on medieval/post-medieval agricultural remains will be reduced to **Negligible or No Effect**, which is not significant.
- The **Negligible to Major Adverse Effect** on potential archaeological remains from the prehistoric to Romano-British archaeological remains will be reduced to **Minor Adverse Effect** or to a **Negligible or No Effect**, which is not significant.

Direct Impacts – Built Heritage

16.9.3 There will be no residual impacts on any Built Heritage during the construction phase

Operation

Direct Impacts – Archaeology

16.9.4 There will be no further direct impacts on buried archaeological remains during operation.

Indirect Impacts – Built Heritage

16.9.5 Although screening may reduce the visual presence of the Proposed Development within the rural landscape, no measures or design choices will mitigate against the loss of the historic fields associated with the Grade II listed Manor Farmhouse. As a result, the residual effect on this asset will remain a **Minor Adverse Effect**, which is not significant.

16.10 Monitoring

16.10.1 No significant residual adverse effects have been identified for Cultural Heritage within this assessment and therefore monitoring is not required.

16.11 Summary

16.11.1 This assessment has been carried out in accordance with national and local planning policy including NPPF and the Sedgemoor District Local Plan, and industry best practice and guidelines. The methodology for the impact assessment follows the principles and guidelines set out within the Design Manual for Roads and Bridges.

16.11.2 The baseline was informed by two technical appendices (a desk-based assessment and a geophysical survey) which indicated that the Site was the location of a former Royal Ordnance Factory established in the late 1930s. Previous archaeological work carried out within the Site in support of the 2017 Planning Consent which was considered within the desk-based assessment, found archaeological remains consistent with activity from the Bronze Age, Iron Age and Romano-British period.

16.11.3 The baseline information also indicated that prior to the establishment of the ROF, the Site was located within the agricultural hinterland of the settlements of Puriton and Woolavington with some preserved evidence of medieval and post-medieval agricultural practices visible within the Site along Woolavington Road.

16.11.4 Due to the substantial known archaeological resource within the Site and the surrounding area relating to prehistoric and Romano-British remains, there is a high potential of encountering additional archaeological remains within the Site, but Outside ROF Fence.

16.11.5 The settings assessment considered the potential effects of the Proposed Development on the heritage significance of heritage assets outside of the Site boundary through a change in their setting. All assets other than the Grade I Listed Church of St Michael and the Angels, Puriton, the Grade II listed Manor Farmhouse, Puriton and the Scheduled Monument Brent Knoll and associated field system were scoped out.

16.11.6 Without mitigation, the Proposed Development has the potential to adversely affect the heritage significance of the historic environment in two ways:

- By damaging and/or removing buried archaeological remains relating to the past use of the Site; and

- By changing the setting of a heritage asset where that setting makes a contribution to its heritage significance, to such an extent that the asset loses heritage significance (or the ability to appreciate and understand that significance is diminished).

- 16.11.7 Through the 2017 Planning Consent, the loss of the ROF buildings through demolition and impacts to any potential below ground archaeological remains were assessed and mitigation for their loss undertaken in the form of historic building recording and archaeological excavation respectively. As a result, this chapter has assessed the potential for disturbing potential archaeological remains within the additional land included within the Proposed Development.
- 16.11.8 Additionally, the supporting 2013 ES, 2013 ES update and 2017 ES Addendum for the 2017 Planning Consent also determined no effects on any designated heritage assets through a change in their setting. Therefore, this assessment determined that any effects on designated heritage assets could only come through new elements of the Proposed Development.
- 16.11.9 Using this methodology, the assessment identified the potential for direct impacts on buried archaeological remains (i.e. loss of the archaeological resource) located within the Site which, taking a conservative approach, would lead to effects in the order of Negligible to Substantial Adverse, which, for Moderate to Substantial Adverse Effects are significant in EIA terms. Following the application of an appropriate scheme of archaeological mitigation (scope to be agreed), the residual effect of these direct impacts would be reduced to Minor Adverse Effect or to a Negligible or No Effect (which are not significant for purposes of the EIA Regulations).
- 16.11.10 A residual Minor Adverse Effect was identified on the Grade II listed Manor Farmhouse, Puriton, which is Not Significant, while no effects were identified on the Grade I listed Church of St Michael and the Angels or Brent Knoll Scheduled Monument. No Mitigation is proposed or considered necessary in respect of the Church and Hillfort. Whilst no specific mitigation is proposed for the Farmhouse, aside from that already covered as part of the Embedded Mitigation, sensitive design of the development in the south-west part of the Site, in line with the Design Code, will serve to soften (if not remove) the impact of development upon the heritage significance of that asset.
- 16.11.11 In conclusion, the Proposed Development will not have any significant adverse direct or indirect effects in respect of the heritage significance of any designated or non-designated heritage assets within or beyond the Site.

16.12 Referencing

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16.13 Non-Technical Summary

- 16.13.1 This chapter has been produced in line with Section 16 of NPPF, 2019, policies D2 and D26 in the Sedgemoor Local Plan the ClfA Standards and Guidelines to establish the potential for significant effects on heritage assets through the construction of the Proposed Development.
- 16.13.2 The majority of the Site comprises the remains of the former Royal Ordnance Factory, Puriton which was constructed in the 1930s to produce ordnance for the armed forces. Outside of the ROF fence, the Site is primarily composed of agricultural land, the character of which was formed in the medieval and post-medieval periods, and the route of a former railway.
- 16.13.3 Information gathered for the baseline, principally from previous archaeological investigations, have indicated there is a high potential for archaeological remains from the prehistoric and Romano-British periods.
- 16.13.4 The assessment established that through construction activities there is a potential for any archaeological remains within the Site to be disturbed or lost entirely. While at present the significance of these remains is unknown, the implementation of an appropriate mitigation

through preservation by record would leave a residual effect of Minor Adverse or Negligible or No Effect, which is not significant.

16.13.5 The assessment also identified a number of designated heritage assets which were sensitive receptors to the Proposed Development through a change in setting. Following a scoping exercise undertaken within the supporting Desk-based Assessment, three assets were identified as requiring further consideration as part of the assessment and included the Grade I Listed Church of St Michael and the Angels, Puriton, the Grade II listed Manor Farmhouse, Puriton and the Scheduled Monument Brent Knoll and associated field system.

16.13.6 The assessment of these assets identified that the Grade II listed Manor Farmhouse would receive a Minor Adverse Effect, which is not significant, through the loss of the agricultural fields within its immediate vicinity which contributed to its significance. No other likely significant effects were identified.

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