



Gravity, Puriton, Bridgwater Somerset

Heritage Technical Note

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Plate 1: View from the Grade I listed Church of St Michael and All Angels churchyard towards the Site, looking east



Summary

Wessex Archaeology was commissioned by This is Gravity Ltd to prepare a Heritage Technical Note in relation to the proposed development at Gravity, Puriton, Bridgwater, Somerset, approximately located between National Grid Reference 333250, 141631 (ST 33250 41631) to 334642, 142041 (ST 34642 42041).

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Gravity, Puriton, Bridgwater Somerset

Historic Environment Technical Note

1 INTRODUCTION

1.1 Project background

1.1.1 Wessex Archaeology (WA) has been commissioned by This is Gravity Ltd (hereafter 'the Client') to prepare a Historic Environment Technical Note in relation to the proposed development at Gravity, Puriton, Bridgwater, Somerset (hereafter 'the Site'), located approximately between National Grid Reference 333250, 141631 (ST 33250 41631) to 334642, 142041 (ST 34642 42041).

1.2 Aims and purpose of the technical note

1.2.1 This technical note has been prepared in response to Historic England's consultation letter (received 8th December 2021, the '2021 Response') in regard to the submitted Local Development Order (LDO) for the Site.

2 THE DEVELOPMENT IN CONTEXT

2.1 Introduction

2.1.1 The Site comprises the land of a former Royal Ordnance Factory (ROF) which has been subject to a previous planning permission under the name of 'Huntsplill Energy Park' (HEP; the 'Consented Scheme' ref. 42/13/00010). This consent is now extant as it has been implemented through delivery of the Gravity Link Road, and is therefore capable of implementation in its entirety and forms part of the environmental baseline for assessment of the Gravity LDO.

2.1.2 Previous archaeological works undertaken as part of the HEP Consented Scheme are discussed in **Section 2.2**, while more information on the HEP application and the technical assessments from a heritage perspective are discussed in **Section 2.4**.

2.2 Previous archaeological works

2.2.1 A series of archaeological works have been undertaken within and immediately adjacent to the Site, including, in chronological order, a desk-based assessment (WA 2011), building recording of the former ROF buildings (WA 2012a), investigations along the route of the Proposed Access Road (PAR) (now the constructed Gravity Link Road) which included geophysical survey (WA 2019a), trial trench evaluation and associated small scale excavation (WA 2019b), an archaeological strip, map and record excavation within the former BAE Systems site (WA 2020), a further geophysical survey over much of the current investigation area (WA 2021a) and a revised and updated Historic Environment Desk-based Assessment (WA 2021b) which informed the most recent Historic Environment Environmental Statement (ES) Chapter supporting the Environmental Impact Assessment (EIA) for the LDO.



2.2.2 Brief accounts of each of the fieldwork stages are provided below. However, the corresponding reports should be consulted in full for further, more detailed information (these can be provided if required).

2012a Historic building recording

2.2.3 A programme of historic building recording of the former ROF site was carried out in 2012. This was undertaken in accordance with an English Heritage Level 2 survey relevant at the time and comprised 42 buildings which reflected the majority of the former processes, services and support functions which took place on the ROF site. The purpose of the recording was to provide a record of the buildings prior to their demolition.

2019a Geophysical survey

2.2.4 This survey comprised a series of pasture and arable fields totalling c. 5 hectares (ha) to the south and east of Puriton as part of the access road to the HEP (now the constructed Gravity Link Road).

2.2.5 The survey detected anomalies of definite, probable, and possible archaeological interest along the linear route. Few of these were identified within the wetter, lower lying northern part of the route. Those anomalies interpreted to be of archaeological origin were thought to represent ploughing trends and land drainage methods.

2012b Field evaluation

2.2.6 The evaluation represented a limited sample of the area evaluated within the ROF boundary. Only one of the 14 trenches (Trench 5 'TR6') encountered archaeological features, although in TR12, a thin layer of peat deposit was also identified. The trenches were positioned in relatively open areas to provide a general overview of the archaeological potential.

2.2.7 Two parallel ditches, both of which were found to cut the very upper surface of the alluvial clays, were identified within TR6. Within the ditches, a complete horse skull, Roman pottery and burnt or fired clay and six iron objects were recovered.

2.2.8 Due to the limited scope of the works, the full potential of the Roman features could not be entirely determined.

2020 Archaeological mitigation works

2.2.9 Archaeological mitigation works at the former ROF site were undertaken between September to October 2020 as a condition of planning permission (ref: 43/13/00010). Although the excavations were relatively small scale (focused on a small area within the south-western extent of the Site), recovered later Iron Age to Romano-British remains were considered to be of interest.

2021a Geophysical survey

2.2.10 The survey comprised land to the east and south of the former ROF including 27 grazing fields to the north of Woolavington Road covering an area of c. 50 ha. The survey area was split over 36 land parcels to target areas not previously subject to geophysical survey.

2.2.11 Three distinct groups of anomalies were identified and indicated ditched enclosures on the western edge, the centre and the north-east of the survey area. The ditches in the north-east suggest a ladder settlement or field system. Given the proximity of prehistoric and Romano-British settlements in the surrounding area an archaeological interpretation cannot



be ruled out for these anomalies, however, they could equally be evidence of modern agricultural activity.

- 2.2.12 The results of the geophysical survey were discussed in detail with the South West Heritage Trust (SWHT) used to produce the scope of archaeological works discussed further below (**Section 2.3**).

2.3 Forthcoming works

- 2.3.1 A Written Scheme of Investigations (WSI) for Archaeological Evaluation within the Site was produced by Wessex Archaeology in November 2021 (2021c). This includes additional land to the south of the Consented Scheme along Woolavington Road which is now included in the LDO. The scope of the evaluation was based on the results of the 2021 geophysical survey, areas of known modern disturbance and existing constraints (such as, for example, land boundaries and services).
- 2.3.2 Following consultations with SWHT, it has been agreed that the evaluation, which comprises 44 trial trenches, is sufficient to characterise the area. Subsequent mitigation may be required depending on the results of the evaluation. This will be presented in an updated WSI once the results are known.

2.4 Previous LVIA and noise assessment

- 2.4.1 In the 2021 Response, further information on the Landscape and Visual Assessment (LVIA) (especially in regard to assessment made of Brent Knoll and listed churches at Woolavington and Puriton and the scope of the assessment) and the noise assessments (especially in regard to noise impacts) produced for the ES was requested by Historic England. While the Client's response was captured in a subsequent letter issued to Historic England on 17th December 2021 (ref: Project / File: Gravity/ 49102), the responses have also been included here for clarity and to ensure that the technical note comprehensively closes out any points previously raised as part of the 2021 Response.

LVIA

- 2.4.2 The LVIA recognised the national importance of Brent Knoll (see Para 14.6.156, LVIA) and identified visual receptors on it being of Very High Sensitivity and the LCA Lowland Hills being of High Sensitivity (see Para 14.6.47 & 48, LVIA). The role of the Churches of St Michael and All Angels (Puriton) and Church of St Mary (Woolavington) are also specifically considered within the LVIA (Para 14.6.77 & 81, LVIA).
- 2.4.3 With regard photography and visualisations, the photographs were taken in accordance with the Landscape Institute 'Technical Guidance Note 06/19 (dated September 2019).
- 2.4.4 This appropriate LVIA assessment has been used to inform the heritage assessment, assisting in identifying potential visual changes as a result of the development upon the identified significance of heritage assets, and the contribution made by any mitigation.

Noise assessment

- 2.4.5 Operational impacts associated with the proposed development considered the change in road traffic noise as the likely most significant impact from a noise perspective during operation. The results of the assessment concluded that change in noise levels at all receptors, including the Listed Buildings and heritage assets within the two villages, is likely to be a negligible change and therefore not significant.



- 2.4.6 During the construction phase, an assessment of on-site plant and off-site construction traffic has also been undertaken. Based on the distance and intervening screening due to existing buildings the likely impact from on-site construction plant to the listed buildings and heritage assets is likely to be a minor/negligible impact of a temporary nature and is therefore not significant. Notwithstanding this conclusion, best practice measures are to be included in the Framework Demolition and Construction Environmental Management Plan (FDCEMP) to further reduce noise emissions during the construction phase. This will further reduce any construction impacts upon the significance of heritage assets.
- 2.4.7 With regards to construction traffic, calculations indicate that the impact on the identified construction routes is likely to be negligible which is not significant. Again, the location of the heritage assets away from these construction routes indicates that the impacts upon their significance from construction traffic noise would also be negligible.
- 2.4.8 As the noise assessment concluded that there would be no adverse permanent impacts/noise increases across the study area which includes the heritage assets within the villages, this conclusion informed the ES Cultural Heritage Chapter inasmuch as these impacts would not lead to harm to the significance of the heritage assets.

2.5 Huntspill Energy Park

- 2.5.1 The HEP consent comprises an outline extant permission for an energy related employment park with all reserved matters (apart from the PAR). This application was supported by an Environmental Statement and was consented in 2017 (planning ref.: 42/13/00010) by Sedgemoor District Council.
- 2.5.2 The year 2032 has been identified as the assessment year for operational effects for the majority of the technical assessments included in the ES (including Cultural Heritage). This year has been identified as it is the end of the current Local Plan period and a date by which it is reasonable to assume that the development approved by the LDO will have been delivered.
- 2.5.3 The current conditions at the Site and in the surrounding area have been factored forward to predict likely conditions at the Site in 2032 to enable the effects of the LDO to be considered against a 'do nothing' scenario.
- 2.5.4 The following elements are therefore included in the 2032 Baseline:
- The implemented 2017 Planning Consent. The safeguarded land uses are not included in the 2032 baseline as they have not been granted consent (i.e., they were safeguarded only and would require a new planning permission or consent to progress).
 - The approved village enhancement scheme was identified as mitigation for the 2017 Planning Consent and will be implemented one year from the opening of the Gravity Link
 - Road, i.e., by autumn 2022. Therefore, this is factored into the 2032 baseline.
 - Landscaping associated with the Gravity Link Road, which is due to be implemented from October 2021.
 - Other existing and approved development in the surrounding area. This includes development that has been allocated in the Local Plan 2011-2032.

- Likely changes to the natural environment between now and 2032. This includes natural changes such as growth in vegetation and establishment of habitats, especially of landscaping implemented as part of the 2017 Planning Consent. It also includes anthropogenic changes such as changes to climate, air quality and human behaviours where there can be a high degree of confidence that such changes will occur (for example the transition towards electric vehicles on the basis of clear Government policy on the phasing out of internal combustion engines and the increase in bus services to avoid private vehicle usage as promoted in the recently published national bus strategy).

- 2.5.5 Each chapter outlines as appropriate how these changes have been considered in establishing the 2032 baseline.
- 2.5.6 For the assessment of effects during operation, the EIA assumes that the Proposed Development will be constructed in accordance with the maximum build out of the mix, quantum and parameters detailed in Chapter 3 of the ES.
- 2.5.7 As such, the Cultural Heritage impacts have been assessed against this baseline, including the changes in the site context described above and including the consented development through 42/13/00010.

2013 and 2017 Historic Environment Assessments and Scope of 2021 HEDBA

- 2.5.8 The original 2013 Environmental Statement (ES) included a Cultural Heritage Chapter (Chapter 10) which was supported by an Archaeological Desk-based Assessment. The assessments predated Historic England's (previously English Heritage) guidance on setting first published in 2015, and as such only archaeology was considered. Furthermore, an assessment of harm to the significance of heritage assets based on a change in their setting was not requested as part of the scope of the ES in 2013.
- 2.5.9 The 2017 assessments provided an update in the form of an addendum to the 2013 assessments only and therefore largely included archaeological considerations only. **Appendix 1** presents the results of the Chapter 10 impact assessment outlined in the 2017 Chapter Addendum (based on the 2013 assessments), however, it must be noted that this covers archaeological considerations only.
- 2.5.10 Due to a change in guidance requiring setting assessment since the 2013 ES, consideration of heritage assets which could experience harm to their significance by way of a change in their setting was covered in the 2021 HEDBA. As such, the HEDBA presents the complete historic environment baseline, that is, it does not only cover archaeological considerations and therefore presents a holistic historic environment assessment. This means that there are no gaps in terms of setting assessment.
- 2.5.11 A gazetteer of the designated heritage assets considered in the 2021 HEDBA is included in **Appendix 2**. Although the known historic environment within a 1 km Study Area informed the baseline of the HEDBA, further factors, such as a bare earth Zone of Theoretical Visibility (ZTV) covering an approximate 5 km radius from the Site, and the results of a site walkover survey covering the Site and the wider surrounding landscape also influenced which heritage assets were identified for further assessment as part of the setting assessment presented in Section 6 of the HEDBA and the 2021 ES. This assessment was undertaken in line with the Historic England GPA3 guidance (2017).



Summary

- 2.5.12 Based on the above, in terms of setting assessment, there are no identified heritage assets that have not been considered by either this technical note or the 2021 HEDBA and corresponding ES Chapter.

3 ADDITIONAL ASSESSMENT FOLLOWING RESPONSE

3.1 Introduction

- 3.1.1 The 2021 Historic England Response highlighted areas where further clarification and/or assessment would be required. Subsequently, additional consultation was carried out on 20th December 2021 which resulted in the production of this technical note to address any outstanding queries.
- 3.1.2 Further clarification in regard to the assessment of harm to the significance of two designated heritage assets, a Scheduled Monument and a Grade I listed building, scoped out of further assessment as part of the 2021 HEDBA was requested in advance of the meeting on 20th December 2021. While this was previously provided for further discussion, this is also included in **Appendix 3**. The assets in question included the Scheduled Motte with two baileys immediately east of Bristol at Down End (NHLE 1019291) and the Grade I listed Church of St Mary at Woolavington (NHLE 1060144).
- 3.1.3 At the meeting on 20th December 2021 additional clarification, especially in regard to potential impacts to the significance of two Grade I listed churches within the Study Area was required. These include the listed Church of St Mary (NHLE 1060144) in Woolavington (to the east of the Site) and the Church of St Michael and All Angels (NHLE 1344664) in Puriton (to the west of the Site) (discussed in **Section 3.2**).
- 3.1.4 In addition to this, further visualisations in relation to views from Brent Knoll and Glastonbury Tor were also requested (discussed in **Section 3.3**).

3.2 Listed Buildings

- 3.2.1 The following sections provide, firstly, a general overview of the results of the WA 2021 HEDBA and the 2021 ES Chapter in regard to the listed churches, and secondly, further information in regard to their visual and/or spiritual landscape relationship.

Church of St Michael and All Angels (NHLE 1344664), Puriton

- The site walkover survey supporting the HEDBA confirmed that limited glimpses of the wider agricultural landscape within which the Site is currently experienced (following the demolition of the ROF buildings) are possible from the churchyard (see **Plate 1**), albeit, these would likely be seasonal only due to the nature of screening afforded by existing mature trees and vegetation.
- While the Church is situated at the centre of the historic village and lies on a plateau of slight topographic prominence, this is best appreciated from Rye (i.e., the road to the east of the Church) where glimpses of the church tower can be appreciated.
- The ES Chapter considered that the immediate setting of the churchyard makes an important contribution to its significance allowing the architectural and historic interests, from which its significance is predominantly derived, to be best appreciated. The wider village centre also makes an important contribution to its significance allowing it to be appreciated as one of the settlement's focal points. Beyond the

Church's immediate and village setting, the ability to experience, the church is diminished, although there are glimpsed views out to the wider landscape.

- When details of the proposed development become available as the scheme progresses through the detailed design process, this would be reassessed as part of the mitigation checklist (see **Section 3.5**).

Church of St Mary (NHLE 1060144), Woolavington

- The site walkover survey supporting the HEDBA confirmed that there is no visual connection with the agricultural landscape within which the Site is currently experienced (following the demolition of the ROF buildings) and the Church.
- The built environment within the settlement centre forms a relatively coherent centre of historic buildings which are best appreciated in close proximity and in combination with each other. Within that centre, the Church forms the focal point and, with its tower, is a prominent feature of the settlement visible in views from the Causeway to the east of the Site (this is further discussed in 'Relationship between the churches and Woolavington church tower' below).
- When further details of the proposed development become available as the scheme progresses through the detailed design process, this would be reassessed as part of the mitigation checklist (see **Section 3.5**).

Relationship between the churches and Woolavington church tower

- 3.2.2 The churches are sited within their respective village settlements and historic parishes of Woolavington (to the south-east of the Site) and Puriton (to the south-west of the Site). While the majority of the Site sits within the parish of Puriton, its most eastern part does extend into Woolavington parish.
- 3.2.3 Church towers are reflection of the spiritual role and dominance of the church within the community. They are an expression of the wealth and status that these religious building to the wider environment.
- 3.2.4 The church tower at Puriton is a less distinctive local landmark outside of the village itself, primarily due to its height and the intervening built character of the surrounding village. It is described as a "*squat unbuttressed tower of 4 receding stages*" in its listing description, with the earliest parts being of 13th century date with later 14th and 15th century additions.
- 3.2.5 The church tower of Woolavington is more prominent than that at Puriton, and can be viewed from outside its village context, and is experienced as part of the wider built form of the village. the Church is best appreciated from within the village, especially from Church Street, looking north, which will not be affected by the proposed development given a complete lack of visibility. While views of the church tower can be achieved from the east and south of the village), it can also be seen when approaching the village travelling southwards along the Causeway.
- 3.2.6 The Causeway is a historic route connecting with Woolavington, set on slightly higher ground due to the susceptibility of the wider area to flooding. Here the church tower is seen as forming part of the wider settlement, with open rural landscape to either side of the Causeway along the route.
- 3.2.7 The experience of travelling and moving along the Causeway is transient. At the intersection of Stoningpound Rhyne, Reeds Rhyne and the Causeway (c. 715 m north-west of the
-



Church), in the context of the wider Woolavington built environment, with an awareness of the proposed development to the west. The tower will be seen and this impact will require further assessment.

- 3.2.8 As stated above, when the detailed design becomes available, this would be reassessed as part of the compliance process and through the mitigation checklist (see **Section 3.5**).
- 3.2.9 The views taken from Brent Knoll as part of the Landscape and Visual Assessment (LVIA) (further discussed in **Section 3.3**) show that only Woolavington is noticeable in southern views from the scheduled hillfort when looking south, indicating that there is also no appreciable visual link between the churches from promontories to the north of the Site. Similarly, from Glastonbury Tor (further discussed in **Section 3.3**), neither village is distinguishable, even though areas which are further away, such as Hinkley Point Power Station, are visible.
- 3.2.10 It is also important to note that changes within views of the landscape, and overall visibility of the development, from these two locations (i.e., Brent Knoll and Glastonbury Tor) will be mitigated through the required Environmental Colour Assessment (Mitigation Checklist item 14) which must be undertaken for the whole site as part of the first compliance submission and referenced in each subsequent compliance application.
- 3.2.11 When traversing along the accessible paths on the northern side of the Polden Ridge (to the south of the Site and villages), both church towers are visible this will need to be assessed at the Compliance stage.

Summary

- 3.2.12 The extent of these potential changes, and any subsequent impact to the significance of the Church based on them, can be appropriately and proportionately assessed and mitigated through the LDO compliance processes. A summary of measures which have been put into place is provided in **Section 3.4**.

3.3 Landscape and wider views

- 3.3.1 This technical note includes views from both Brent Knoll and Glastonbury Tor to show the likely parameters, including the assumed heights of the flues which could potentially be dispersed across the Site. These are further discussed below and included as **Appendix 4**.

Brent Knoll

- 3.3.2 The scheduled hillfort and associated field system of Brent Knoll (NHLE 1008248) was scoped in for assessment as part of the Setting Assessment in the HEDBA and for further assessment in the ES.
- 3.3.3 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.
- 3.3.4 the proposed development would likely prevent visibility towards the hillfort from limited locations. It would continue to be visible from other vantage points within the surrounding landscape.
- 3.3.5 As such, the ES concluded that the hillfort is an asset of high heritage significance with the magnitude of impact from the proposed development assessed. The scheme would result



in harm but through the mitigation measure the impact could be brought down to negligible, resulting in a negligible or no effect, which is not significant.

Glastonbury Tor

- 3.3.6 Since the production of the ES, Glastonbury Tor, which is both scheduled (NHLE 1019390) and listed (NHLE 1345475), has been identified by Historic England as requiring inclusion for further consideration based on the potential for impacts to its significance due to a change in its wider setting. As such, this asset has been included for consideration in this technical note. The following sections will provide an overview of the asset's significance, its setting and the contribution setting makes to its significance.
- 3.3.7 Glastonbury Tor primarily derives its significance from its archaeological (especially in terms of its scheduled aspect) and architectural (especially in terms of its listed aspects) interests. The tower with the upper storey remains extant which forms a dominant feature of the Somerset landscape.
- 3.3.8 The setting of Glastonbury Tor is defined by its prominent landscape position on top of a natural hill which offers views to and from the surrounding landscape and as such is far ranging, with views as far as Hinkley point and the seascape beyond
- 3.3.9 The fact that Glastonbury Tor is a prominent landscape feature is important when considering views towards it, while the fact that long distance views can be achieved from the monument is also important. As such, the setting of the asset makes a positive contribution to its significance, and it is assumed that its topographical prominence was likely a contributing factor as to why this site was selected for occupation and monastic activity in the first place.

Additional assessment of wider views in regard to Brent Knoll and Glastonbury Tor

- 3.3.10 When displaying the extent of the Site in white and adding the flue limits as a dashed line, the view from Brent Knoll shows that the development (including the flues) would not block views towards the Polden Ridge from Brent Knoll.
- 3.3.11 Similarly, this is also the case for views from Glastonbury Tor, where the view shows that, even with the addition of the parameter heights of the flues, the height of the development would not break the skyline.
- 3.3.12 It is acknowledged that this was a former brownfield site. However, this assessment is considering the worst-case scenario and the development has the potential to form a conspicuous structure within the landscape, which could be considered to be harmful. However, we are of the view that this can be mitigated through the compliance process to be reduced the impact to negligible or no harm.

3.4 Assessment Summary and Action Steps

- 3.4.1 The ES identified that there is potential for harm to the significance of the Grade II listed Manor Farmhouse (NHLE 1060137) as a result of a change in its setting due to the proposed development leading to the loss of associated rural land. This is based on the account of the rural landscape contributing to the asset's significance and the fact that rural landscape views from the building would likely be impacted, thereby harming our understanding of its connection with the agricultural landscape.
- 3.4.2 Additionally, although no detailed design is currently available, this technical note acknowledges that, depending on the final design of the proposed development, the



potential for harm to the assets captured in this note, being the two churches, Brent Knoll and Glastonbury Tor, would need to be re-evaluated to confirm any potential harm to their significance.

3.4.3 This is based on the fact that, in a worst-case scenario, these assets have been identified as having the potential for experiencing harm which, based on the information currently available, cannot be fully ascribed. Where such an impact could originate from that might lead to harm to the significance of heritage assets cannot currently be specified. However, this would need to result in such a substantial change within the setting of a heritage asset which would in turn directly harm the significance of the asset. This is in line with Historic England's GPA3 guidance on The Setting of Heritage Assets (2017) which notes that, while setting is not itself a heritage asset, "*its importance lies in what it contributes to the significance of the heritage asset or the ability to appreciate that significance*". 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.

3.4.4 Based on the above, the following measures have been put into place to ensure that such a review process is undertaken as soon as the final design becomes available:

- Design principles *BH2: Design to mitigate where possible the landscape and visual impacts as identified in the ES; and BH5 An innovative approach to design and materials which considers the landscape and visual impact of the building(s)* (in regard to building heights), as well as *SL1: Create strong strategic landscape at the edges of the site* will be updated to make greater reference to the historic environment and its landscape and cross reference back to this technical note added.
- A mitigation checklist, which accompanies the compliance form of the application, has been produced with specific reference to the aforementioned heritage assets as part of mitigation checklist item 16 (see **Section 3.5**).
- A Heritage Impact Assessment (HIA) will be added to the Application for Compliance Form as a supporting document which will need to be provided in support of a valid application for compliance with the LDO. This will ensure that an assessment of harm to the significance of the historic environment, in particular those assets included in checklist item 16, is provided at each application for compliance stage.

3.4.5 The above action steps ensure that an assessment of potential harm to the significance of (in particular the above named) heritage assets will be undertaken based upon the final scheme once known.

3.5 Mitigation Checklist item 16

3.5.1 To further support the LDO application, and to ensure that mitigation is being considered at an early stage, a mitigation checklist accompanies the compliance form of the application. Draft mitigation checklist item 16 (MC16) currently considers designated heritage assets, their setting and landscape views and it is proposed that the wording of the draft item could be amended as follows to address the key findings of this note and additional assessment herein:

"Each compliance application must consider impacts upon the significance of designated heritage assets based on a change in their setting by way of a proportionate assessment which identifies the level of harm in accordance with the NPPF. This should include an



assessment of the following designated heritage assets in particular, views to and from the asset and their landscape setting, itemised as follows:

Item 1) views to and from the asset, including the Grade I listed Church of St Michael and All Angels (NHLE 1344664), Grade I listed Church of St Mary (NHLE 1060144) and Grade II listed Manor Farmhouse (NHLE 1060137).

Item 2) landscape settings, including from Brent Knoll Scheduled Monument (NHLE 1008248) and from Glastonbury Tor Scheduled Monument and Grade I Listed Building (NHLE 1019390, 1345475).

Any mitigation should seek to ensure that there is no or minimal conflict between the heritage asset's conservation or any aspect of the proposal. Proposed mitigation should be set out in the form of design measures to accommodate the built structures in a way that will positively respond to the setting of the designated heritage assets."



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Wessex Archaeology, 2012b. *Royal Ordnance Factory, Puriton, Somerset: Archaeological Evaluation Report* (Report ref.: 84300.03)

Wessex Archaeology, 2017. Chapter 10 Cultural Heritage '*Huntspill Energy Park: Environmental Statement*'

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Wessex Archaeology, 2019b. *Gravity Energy Park Access Road, Puriton, Somerset: Archaeological Investigations* (Report ref.: 218370)

Wessex Archaeology, 2020. *Gravity, Cowslip Meadow, Puriton, Somerset, Archaeological Mitigation Interim Summary of Results* (Report ref: 218372)

Wessex Archaeology, 2021a. *Gravity, Puriton, Cowslip Meadow: Detailed Gradiometer Survey Report* (Report ref.: 218373)

Wessex Archaeology, 2021b. *Gravity: Historic Environment Desk-based Assessment* (Report ref.: 218374.01)

Wessex Archaeology, 2021c. *Gravity, Puriton, Bridgwater, Somerset, Written Scheme of Investigation for Archaeological Evaluation* (Report ref.: 218375.01)

Online resources

ADS: <http://archaeologydataservice.ac.uk/>

Historic England: <http://www.historicengland.org.uk/listing/the-list/>

All URLs Accessed on 10/01/2022

PLATES



Plate 1: View from the Grade I listed Church of St Michael and All Angels churchyard towards the Site, looking east



APPENDICES

Appendix 1: Impact Assessment Table as per 2017 ES Addendum Chapter 10 Cultural Heritage (based on 2013 results)

HUNTSPELL ENERGY PARK: ENVIRONMENTAL STATEMENT Cultural Heritage									
Table 10.4 Cultural Heritage Impact Table									
Development Activity	Potential Impact Identified	Magnitude of impact	Positive /adverse	Direct/ Indirect/ Secondary	Short / Medium / Long - Term	Temp/ perm	Significance	Mitigation Measures	Significance of Residual Impact
CONSTRUCTION PHASE									
Groundworks associated with Energy Park	Loss of Romano- British buried remains (low value)	High	Adverse	Direct	Long term	Perm	Moderate	Known archaeological remains located within green spaces within site. Phased archaeological investigation to record buried remains	Minor Adverse
	Loss of previously unknown archaeological remains in previously developed areas (very low value)	High	Adverse	Direct	Long term	Perm	Minor	Phased archaeological investigation to record buried remains	Minor Adverse
	Loss of peat deposits and palaeo-environmental data (low value)	High	Adverse	Direct	Long term	Perm	Moderate	Limited development in northern part of Site. Phased archaeological investigation to record buried remains.	Minor Adverse
Groundworks associated with Access Road	Loss of Romano- British buried remains (medium value)	High	Adverse	Direct	Long term	Perm	Substantial	Phased archaeological investigation/ excavation to record buried remains	Minor Adverse
	Loss of windmill site (low value)	High	Adverse	Direct	Long term	Perm	Moderate	Phased archaeological investigation to record buried remains	Minor Adverse
	Partial loss of tramway route (low value)	Low	Adverse	Direct	Long term	Perm	Minor	Phased archaeological investigation to record buried remains	Negligible Adverse
OPERATION PHASE									
Operation of Access Road	Loss of context of the historic landscape	Medium	Adverse	Direct	Long term	Perm	Minor	Appropriate screening	Minor Adverse



Appendix 2: Gazetteer of Designated Heritage Assets considered in the 2021 HEDBA with an additional column showing which assets are specifically being covered under MC16 following the submission of the ES

NHLE No.	Grade	Name	Level of Harm as per HEDBA (to be reviewed in the Heritage Impact Assessment as part of the Application for Compliance)	Covered under MC16 following ES submission? Y/N
1008248	N/A	Brent Knoll	Likely harm – to be taken forward for further assessment in ES Chapter	Yes
1019291	N/A	Motte with two baileys immediately east of Bristol Road, Down End	No harm identified	No
1060144	I	CHURCH OF ST MARY	Likely harm – to be taken forward for further assessment in ES Chapter	Yes
1344664	I	CHURCH OF ST MICHAEL AND ALL ANGELS	No harm identified	Yes
1060102	II	UNIDENTIFIED MONUMENT IN CHURCHYARD, ABOUT 10 METRES SOUTH OF CHANCEL, CHURCH OF ST MARY	No harm identified	No
1060103	II	GOLDCLEEVE	No harm identified	No
1060104	II	POOL HOUSE	No harm identified	No
1060105	II	GRANGE COTTAGE	No harm identified	No
1060106	II	EAST GRANGE THE GRANGE	No harm identified	No
1060107	II	COCKPIT IN GROUNDS OF THE GRANGE	No harm identified	No
1060137	II	MANOR FARMHOUSE	Likely harm – to be taken forward for further assessment in ES Chapter	Yes
1173477	II	UNIDENTIFIED MONUMENT CHURCHYARD, ABOUT 10 METRES SOUTH EAST OF CHANCEL, CHURCH OF ST MICHAEL AND ALL ANGELS	No harm identified	No
1296223	II	GATEWAY TO PURITON MANOR	No harm identified	No
1344686	II	UNIDENTIFIED MONUMENT IN CHURCHYARD, ABOUT 15 METRES SOUTH EAST OF EAST END OF CHURCH OF ST MARY	No harm identified	No
1344687	II	CAUSEWAY FARMHOUSE	No harm identified	No
1344688	II	HALLACOTT	No harm identified	No



Appendix 3: Additional Assessment of Reason for Scoping Out at 2021 HEDBA Stage

Asset Name	Location to Site	Reason for Scoping Out of further assessment following site visit
Motte with two baileys immediately east of Bristol, Down End (NHLE 1019291)	900 m to the west of the Site	<p>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. The asset is located outside of Puriton's main core (to the west of the Site) and is separated from it by the M5 and the small residential area of Down End (part of Puriton).</p> <p>The significance of the monument mainly consists of its archaeological and historic interests. Its archaeological interest is best appreciated from close inspection of its remains, while its historic interest links to, firstly, the local history and development of Puriton, and, secondly, to the history of the wider medieval fortifications introduced by the Normans in Somerset.</p> <p>The immediate topography surrounding the Scheduled Monument is relatively flat, and this, combined with the fact that it is largely surrounded by trees, limits views from the top of the surviving mounds which do not extend beyond Down End, the Bridgwater Centre industrial estate and the Bridgwater Business Centre (located to the west and south of the monument respectively).</p> <p>Based on this, the existing setting of the monument comprises a settlement edge character which borders on to an industrial/business park area. It is considered that the existing immediate setting of the monument contributes little to the appreciation of its interests, but that it does somewhat contribute to the understanding of its historic interest.</p> <p>The historic setting of the motte and bailey castle would have likely afforded it good views across the wider landscape due to its position at the northern end of the Polden Hills.</p> <p>The Site is located outside the immediate setting of the monument and forms part of the wider backdrop of the area which includes a mainly agricultural landscape with interspersed settlements and areas of scattered modern developments. This wider setting would have historically been important in understanding the monument and its placement within the wider Norman fortifications and along the Somerset Levels, however, this has now been lost.</p> <p>Therefore, the Site is not considered to form part of the setting of the monument that still contributes to its significance (i.e., its immediate setting). As such, this Scheduled Monument is scoped out of further assessment.</p>
Church of St Mary, Woolavington (NHLE 1060144)	800 m south-east of the Site	<p>The Grade I listed Church of St Mary is located within the core of Woolavington. The Church is of 11th century date, although it was altered from then onwards and extensively restored in the 1880s. From its location within the village core, views towards its surrounding rural landscape are limited.</p> <p>The significance of the church consists of its archaeological, architectural and historic interests. Broadly, the archaeological interest includes the church and the churchyard and focuses on what information it could yield about the church's construction, use and origin. The architectural interest lies in the design and decorative features of the church. Elements as part of any changes and restorations from the 11th century onwards are themselves of interest.</p> <p>The historic interest of the church is linked to the development of Woolavington. This interest is strengthened by its location within the historic core of the settlement and its position within the cluster of other surviving Listed Buildings which also contribute to the understanding of the village (further discussed below).</p> <p>The church is set within a small cluster of other Listed Buildings located within the settlement core. This cluster forms a relatively coherent centre of historic buildings which are best appreciated from close proximity and in</p>



		<p>combination with each other which also helps to understand the historic development of the village. Within this cluster, the listed church provides a focal point and is sited within its own churchyard. As such, the village setting which forms the church's immediate setting is considered to greatly contribute to the historic interest of the asset.</p> <p>The church tower forms a prominent feature of the settlement and is visible from approaches to the settlement, for example, from Causeway/the B3141 to the north (to the east of the Site), Eight Acre Drove to the east of the church, and Combe Lane to the south-east of the church. While the Site may be visible in the same views towards the tower from the Causeway (when approaching Woolavington from the north), it is anticipated that the Site would not detract from or harm the significance of the Church through a change within a view of the church tower.</p> <p>The surrounding agricultural landscape forms the wider backdrop setting of the village, however, this setting is not considered to meaningfully contribute to the significance of the church.</p> <p>The Site is therefore not considered to form part of the setting of the church that actively contributes to its significance (i.e., its immediate village setting). As such, this Listed Building is scoped out of further assessment.</p>
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Appendix 4: Figures 1 and 2 showing views from Brent Knoll and Glastonbury Tor towards the Site



Appendix 5: Huntspill Energy Park Technical Report on Potential Energy Generation



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