

Heritage Impact Assessments

Cotswold Local Plan

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SUMMARY

Oxford Archaeology was commissioned by Cotswold District Council to undertake Heritage Impact Assessments (HIAs) for 17 potential site allocations identified through the emerging Cotswold Local Plan process. The results of the HIAs will inform the site selection process and will form part of the Local Plan evidence base.

The assessments identified a varied pattern of heritage sensitivity across the district. The principal issues relate to the contribution made by undeveloped land to the rural setting of historic settlements, conservation areas, listed buildings and scheduled monuments, together with the potential loss of archaeological remains and historic landscape character. Many of the allocations are located on settlement edges where agricultural land contributes to historic settlement form, settlement separation and the appreciation of heritage assets.

Of the 17 sites assessed, five were assigned a high heritage constraint rating, eleven a moderate heritage constraint rating, and one a lower heritage constraint rating. Constraint ratings reflect the significance of affected heritage assets, the contribution made by the site to that significance, the likely scale of impact and the potential for reducing impacts through design or archaeological investigation.

The HIAs also considered the potential for cumulative effects arising from multiple allocations. Cumulative effects were identified in several locations, most notably around Preston and Cirencester, where allocations C164A and R519/650 have the potential to affect the setting of Preston Conservation Area, the scheduled Roman town of Corinium and intervening rural landscapes. Additional cumulative effects were identified at Stow-on-the-Wold.

1 INTRODUCTION

1.1 Background

1.1.1 Oxford Archaeology was commissioned by Cotswold District Council to undertake Heritage Impact Assessments (HIAs) for proposed site allocations identified through the emerging Local Plan process.

1.1.2 Cotswold District contains a highly sensitive historic environment with a dense concentration of designated and non-designated heritage assets, including historic landscapes and archaeological remains. Many of the potential site allocations are situated on the edge of existing settlements or within landscapes that contribute strongly to heritage significance.

1.1.3 National Planning Policy Framework (NPPF) sets out a requirement for Local Plans to:

- Identify and assess the significance of heritage assets likely to be affected;
- Consider impacts on significance through changes to setting and from cumulative change, resulting from neighbouring proposals
- Set out a positive strategy for the conservation and enjoyment of the historic environment.

1.1.4 The purpose of the HIAs provided within this document is to identify heritage constraints and opportunities associated with each potential allocation site to inform decisions on whether the site is suitable for allocation within the emerging Local Plan.

1.1.5 The HIAs will form part of the evidence base for the Local Plan and will demonstrate that the plan has properly considered any heritage impacts arising from the allocations and taken appropriate steps to remove or reduce these impacts. Where appropriate the assessments will also highlight opportunities for the development to be informed by and draw positively on, the historic environment to shape the character of places and identify opportunities for new development to enhance or better reveal the significance of heritage assets and their settings.

1.2 Scope of Work

1.2.1 A total of 17 potential site allocations have been considered as part of this assessment. These sites include a combination of large scale allocation sites and smaller scale allocations set within, or on the periphery of existing settlements.

1.2.2 A summary of the original allocations as initially consulted upon is set out in Table 1.2 below.

Table 1.2: Summary of potential allocation sites

Reference	Name	Parish	Allocation Type	Number of Dwellings	Employment Area (ha)
R538B/C/D	Strategic site north of Ampney Crucis	Ampney Crucis	Residential	660	-

Reference	Name	Parish	Allocation Type	Number of Dwellings	Employment Area (ha)
B56	Land off Mallard Crescent	Bourton-on-the-Water	Residential	53	-
C190	Strategic extension to the south of The Steadings	Cirencester	Mixed use	1,540	2.1ha
C164A	Strategic extension to the east of Kingshill Lane	Cirencester	Mixed use	612	0.6ha
DA5-DA32	Strategic extension to the north, east and south of Down Ampney	Down Ampney	Residential	2,050	-
R644/657/658	New settlement to the south of Driffield	Driffield	Mixed use	2,565	13.5ha
F20A	Land south-east of Fairford	Fairford	Residential	109	-
F53A	Land at Totterdown Hill, Horcott	Fairford	Residential	150	-
K12	Land south-west of Kemble	Kemble	Mixed use	1,400	1.0ha
L19	Land south of Butler's Court	Lechlade	Residential	9	-
MK2B/C	Land north-east of Mickleton	Mickleton	Residential	40	-
M19C	Dunstall Farm, Fosseway	Moreton-in-Marsh	Residential	360	-
R519/650	Strategic extension to the south of Preston	Preston	Mixed use	1,085	6.7ha
R592	Land at Springfield Road	Quenington	Residential	31	-
SD17	Land east of Siddington Road and west of Bluebell Drive	Siddington	Residential	5	-
S55B	Remainder of site at Tall Trees, Oddington Road	Stow-on-the-Wold	Residential	15	-
S68	The Hollies	Stow-on-the-Wold	Residential	25	-

1.2.3 A site specific HIA has been prepared for each of the potential allocation sites (Appendix B).

2 POLICY AND GUIDANCE CONTEXT

2.1.1 This section provides a brief summary of the legislation, national planning policy and guidance used to inform this assessment.

2.2 Legislative context

Ancient Monuments and Archaeological Areas Act 1979

2.2.1 The Ancient Monuments and Archaeological Areas Act (1979) specifies that an archaeological site or historic building of national importance can be designated as a scheduled monument and registered with the Department of Culture, Media and Sport (DCMS). Under the terms of the act, any development that could affect the scheduled monument is subject to the granting of scheduled monument consent. Historic England provides advice to DCMS regarding individual applications for scheduled monument consent and also offers advice on the management of scheduled monuments.

Planning (Listed Buildings and Conservation Areas) Act 1990

2.2.2 The Planning (Listed Buildings and Conservation Areas) Act 1990 provides special controls in respect of listed buildings (buildings that are seen to be of special architectural or historic interest) and conservation areas (areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance).

2.2.3 Local authorities have a statutory duty under the provisions of sections 16, 66 (1) and 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, when exercising any of their planning powers, to have 'special regard' to certain matters.

2.2.4 Section 66 (1) of the above act sets out the general duty of local planning authority in respect of exercising planning functions in respect of listed buildings:

'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any feature of special architectural interest or historic interest which it possesses.'

2.2.5 When a local planning authority exercises planning functions in a conservation area, Section 72 (1) of the above act states:

'In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.'

2.2.6 Section 74 of the 1990 act also specifically refers to the control of demolition in conservation areas.

Historic England Register of Parks and Gardens in England

- 2.2.7 The Register of Parks and Gardens of Special Historic Interest in England is maintained by Historic England (formerly English Heritage) and divides the site into three grades, similar to those used for listed buildings:
- Grade I: sites of exceptional interest;
 - Grade II*: particularly important sites of more than special interest; and
 - Grade II: sites of special interest warranting every effort to preserve them.

2.3 National Planning Policy*National Planning Policy Framework*

- 2.3.1 The National Planning Policy Framework (NPPF) provides the overarching policy framework for assessing heritage impacts as part of the site allocation process. NPPF identifies protection and enhancement of the historic environment as a component of sustainable development (paragraph 8(c)), requires strategic policies to make sufficient provision for the conservation and enhancement of the historic environment (paragraph 20(d)), and requires Local Plan policies to be supported by relevant, proportionate and up-to-date evidence (paragraph 32).
- 2.3.2 NPPF also requires plans to be informed by sustainability appraisal and consideration of reasonable alternatives (paragraph 34), with these matters forming part of the test of whether a plan is justified and therefore sound (paragraph 36(b)).
- 2.3.3 Further relevant policies require development to respond positively to local character, history and landscape setting (paragraph 135(c)) and recognise the importance of preserving the setting and special character of historic towns (paragraph 143(d)).
- 2.3.4 Section 16 of the National Planning Policy Framework (NPPF) sets out the Government's approach to conserving heritage assets in a manner appropriate to their significance and provides the policy basis for assessing potential effects on designated and non-designated heritage assets.
- 2.3.5 Paragraph 203 states:
- 'Plans should set out a positive strategy for the conservation and enjoyment of the historic environment'*
- 2.3.6 Paragraph 207 states:
- 'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest,*

local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.'

2.3.7 Paragraph 208 states:

'Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.'

2.3.8 Paragraph 212 states:

'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'

2.3.9 Paragraph 213 states:

'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional*

(non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets).'

2.3.10 Paragraph 214 states:

'Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a) the nature of the heritage asset prevents all reasonable uses of the site; and

b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

d) the harm or loss is outweighed by the benefit of bringing the site back into use.'

2.3.11 Paragraph 215 states:

'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'

2.3.12 Paragraph 216 states:

'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'

2.3.13 Paragraph 218 states:

'Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible

(Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository).

However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.'

2.3.14 Paragraph 219 states:

'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.'

2.3.15 Paragraph 220 states:

'Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 214 or less than substantial harm under paragraph 215, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.'

2.4 Historic England Guidance

2.4.1 To ensure the assessment is comprehensive and carried out in line with best practice guidance the methodology has been prepared in accordance with key guidelines for assessing significance and managing change in historically sensitive places. Key guidelines include:

- Historic England's Good Practice Advice in Planning 1-3 (2015a, 2015b, 2017)
- Historic England's Advice Note 3 *The Historic Environment and Site Allocations in Local Plans* (2015c)
- Historic England's, *Conservation Principles* (2008)
- Historic England's Advice Note 12 *Statements of Heritage Significance* (2019)
- Planning Practice Guidance: Historic Environment – Published by Ministry of Housing, Communities & Local Government (updated 2019)

3 METHODOLOGY

3.1 Introduction

3.1.1 The methodology for the HIAs was developed in accordance with National Planning Policy Framework and Guidance (NPPF and PPG) and follows the staged approach outlined in:

- Historic England Advice Note 3 *The Historic Environment and Site Allocations in Local Plans* (Historic England 2015)
- Historic England Good Practice in Planning Advice Note 1 (GPA 1) *The Historic Environment and Local Plans* (Historic England 2015).

3.1.2 The HIAs for the individual site allocations will focus on the identification and consideration of designated and non-designated heritage assets that may be affected by the proposed allocations, either directly or through changes to their setting. Consideration has also been given to historic landscape character, and relationships between heritage assets and their wider landscape context. The HIAs are not intended to replace application stage heritage statements or detailed archaeological desk-based assessments.

3.1.3 Archaeological considerations have been informed by a review of Gloucestershire Historic Environment Record data and comments provided by Gloucestershire County Archaeologist. Where known archaeological assets or areas of archaeological interest have been identified within an allocation site, these have been noted within the HIA and, where appropriate, recommendations have been made regarding the potential need for further archaeological assessment or investigation. The individual HIAs have not sought to provide a detailed assessment of archaeological potential or identify previously unrecorded archaeological remains through specialist techniques such as detailed aerial photographic analysis, LiDAR interpretation, geophysical survey or field investigation. Such matters would be addressed through site-specific assessment and investigation carried out as part of the planning application process.

3.2 Step 1: Identification of affected heritage assets and assessment of potential for previously unidentified archaeological remains

A desk-based review of the following sources was carried out to inform the HIAs:

- The National Heritage List for England for information on designated heritage assets

- The Gloucestershire Historic Environment Record (GHER) for non-designated heritage assets.
- Gloucestershire Historic Landscape Character Assessment (GHLCA).
- Relevant Conservation Area Appraisals, Management Plans and Neighbourhood Plan documents.
- Local list data as held by Cotswold District Council and Gloucestershire County Council.
- National and Local 'Heritage at Risk' data sets; and
- Historic Ordnance Survey (OS) maps as held by an online repository.
- Various online sources

3.2.1 These sources were collected for a 1km study area surrounding each of the proposed allocation sites.

3.2.2 This information was used to identify heritage assets within the site and its environs which could be affected by the proposed site allocation either directly or through changes to its setting, character or views.

Site Visits

3.2.3 Following the data collection stage of the project a rapid site visit was carried out to establish intervisibility between the site and heritage assets within the surrounding study area. This was carried out from public rights of way and publicly accessible areas. The visits were used to scope in/out heritage assets which may be affected by the allocation.

3.3 Step 2: Understand what contribution the site (in its current form) makes to the significance of identified heritage assets

3.3.1 The significance of known heritage assets which could be affected by the potential site allocations have been described in accordance with NPPF and Historic England Advice Note 12 *Statements of Heritage Significance: Analysing Significance in Heritage Assets* (Historic England 2019).

3.3.2 The significance of heritage assets is defined in terms of their value to this and future generations as a result of their heritage interests. Heritage interest is derived from both the heritage asset itself and its setting. In accordance with NPPF this interest may be archaeological, architectural, artistic, or historic.

3.3.3 For each asset scoped into the assessment the HIAs have described the heritage interests of the asset and the contribution that the site makes to these interests (or the ability to appreciate these interests) using the information collected in Step 1.

3.3.4 Once the heritage interests of the asset have been identified it will be allocated an overall heritage rating using the criteria outlined in the table below:

Significance	Criteria (Significance)
Very High	World Heritage Sites and the individual attributes that convey their outstanding Universal Value, or non-designated heritage assets of demonstrable international heritage interest
High	Scheduled monuments, listed buildings (Grade I, II*, II), conservation areas, registered parks and gardens (Grade I, II*, II), registered

	battlefields, protected wreck site, or non-designated heritage assets of demonstrable national importance due to their heritage interest.
Medium	Locally listed buildings, landscapes or non-designated heritage assets of demonstrable regional importance due to their heritage interest
Low	Non-designated heritage assets or landscapes of demonstrably limited heritage interest.
Negligible	Non-designated heritage asset of limited heritage interest.
Unknown	The significance of the heritage asset cannot be ascertained from available evidence.

3.3.5 The setting of the heritage assets was assessed in accordance with Historic England's *The Setting of Heritage Assets* (2nd edition).

3.3.6 Elements of a heritage asset's setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. The criteria used to grade the contribution that an area makes to the setting and significance of a heritage asset is outlined in the table below:

Contribution	Criteria (Contribution)
High Positive	The area/allocation makes an important contribution to one (or more) of the key heritage interests of the heritage assets and accordingly makes a strong positive contribution to its significance.
Low Positive	The area/allocation makes a limited contribution to one (or more) of the key heritage interests of the heritage asset and accordingly makes a positive contribution to its significance
Neutral	The area/allocation in its current form makes no contribution to the understanding or appreciation of the heritage interests of a heritage asset
Negative	The area/allocation detracts from the understanding or appreciation of the heritage interests of a heritage asset

3.4 Step 3: Impact Assessment

3.4.1 An impact assessment has been produced for each of the proposed allocations. This describes:

- The potential impact of the proposed allocation on the character, condition and setting of known designated heritage assets
- The potential impact of the proposed allocation on known non-designated heritage assets.
- The potential impact of the proposed allocation upon the historic landscape character of the site and its environs; and

3.4.2 The impact assessment identifies direct and indirect (setting impacts) arising from the scale and location of the development, settlement edge expansion and changes to the historic landscape character as well as effects on views on the approach into settlement (where such views contribute to heritage significance). It also identifies any cumulative effects resulting effects from other allocations.

3.4.3 The scale of the impact upon identified assets has been described as either: no harm; less than substantial harm, potential for substantial harm, or potential enhancement of significance.

3.5 Step 4: Maximising enhancement and avoiding harm

3.5.1 In accordance with Step 4 of Historic England Advice Note 3 The Historic Environment and Site allocations in Local Plans (Historic England 2015) the final stage of the HIAs is the identification of measures that will maximise enhancement and minimise the harm resulting from the allocation of the site. A suite of recommendations have been made for each allocation to remove or reduce the level of harm identified.

3.5.2 These measures include identification of parts of the allocation that should not be developed or should be put to a particular use (i.e. green infrastructure); areas where buffers or landscape treatments could be used to minimise harm or protect the setting and /or significance of assets; areas where height, density or layout should be subject to design controls and key views and spatial relationships between heritage assets that should be retained.

3.5.3 Where possible opportunities for heritage enhancements, heritage-led placemaking or to better reveal the significance of heritage assets have also been identified.

3.6 Conclusions and suitability

3.6.1 Each HIA contains a conclusion and suitability section which summarises the key heritage sensitivities and the nature and scale of likely impacts.

3.6.2 In line with NPPF, the overall effect of the proposed allocation (or the degree of harm caused by the allocation) has been assessed with reference to the significance of known heritage assets and the potential impacts resulting from the allocation. Based upon this assessment each site has been allocated a heritage constraint rating based upon the criteria provided in the table below.

Heritage Constraint Rating	Criteria
High	The allocation site contains known historic environment constraints that are of high or very high heritage significance. The presence of such assets would prevent a considerable proportion or all of the site from being developed.
Moderate	The site contains historic environment constraints that are of medium or low significance. The site is suitable for development subject to recommended mitigation or design controls.
Lower	The allocation site contains heritage assets of negligible significance. Or

	The allocation contains no heritage constraints
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4 SUMMARY OF FINDINGS

4.1.1 A total of 17 potential allocation sites were assessed. Individual HIAs have been produced for each allocation and are provided in Appendix B. The results of the HIAs are summarised below.

Table 4.1: Summary of HIAs

Site	Name	Principal Sensitivities	Potential Impact	Recommendations to reduce harm and maximise enhancement	Heritage Constraint Rating
R538B/C/D (no longer proposed for allocation)	Strategic site north of Ampney Crucis	Ampney Crucis and Ampney St Mary Conservation Areas; listed buildings at Hilcote End and Dudley Farm; archaeology and historic landscape character.	Potential erosion of rural setting, settlement form and separation, with loss of archaeological remains and historic landscape character.	Reduce development scale and avoid the most sensitive eastern/south-eastern areas; retain green buffers, corridors, boundary planting and PROWs; use lower-density, locally responsive design; undertake archaeological evaluation and agree mitigation, with interpretation where appropriate.	High
B56	Land off Mallard Crescent	Archaeological remains	Loss of potential archaeological remains, areas of ridge and furrow and historic landscape character.	Undertake archaeological evaluation and agree mitigation, with interpretation where appropriate.	Lower
C190	Strategic extension to the south of The Steadings	Scheduled settlement south-east of Chesterton Farm; listed buildings at the Royal Agricultural	Potential truncation of the scheduled monument and associated remains, with adverse effects	Retain the Scheduled Monument as open space with appropriate landscape buffers; avoid sensitive site edges and focus development in less sensitive central areas; retain historic routes,	High

Site	Name	Principal Sensitivities	Potential Impact	Recommendations to reduce harm and maximise enhancement	Heritage Constraint Rating
		College, Chesterton Farm, Merrill Farm, Furzen Leaze Farm and Barton Farm; archaeology and historic landscape character.	on setting of scheduled monument and nearby listed buildings. Loss of archaeological remains and historic landscape character.	hedgerows and field boundaries; use locally responsive design; and undertake archaeological evaluation with agreed mitigation.	
C164A	Strategic extension to the east of Kingshill Lane	Preston Conservation Area; listed buildings at Preston and Norcote; scheduled Roman town of Corinium; archaeology and historic landscape character.	Potential erosion of rural setting and settlement separation, with cumulative effects on Preston Conservation Area. Loss of archaeological remains and historic landscape character.	Retain lower-density development and substantial green infrastructure along the southern, eastern and northern site edges; focus development within the less sensitive central and northern areas; retain and enhance existing planting, hedgerows, field boundaries and historic routes; preserve key views and separation between settlements; reflect historic landscape features within the layout; use locally responsive vernacular design and restricted building heights; prepare a sensitive masterplan in accordance with the Cotswold Design Code; and undertake archaeological survey, evaluation and agreed mitigation prior to development.	Moderate
DA5-DA32	Strategic extension to the north,	Scheduled and listed Village Cross; listed buildings in northern	Loss of historic estate land, rural setting, archaeological	Retain undeveloped margins and existing boundaries at sensitive site edges; set development back from key	Moderate

Site	Name	Principal Sensitivities	Potential Impact	Recommendations to reduce harm and maximise enhancement	Heritage Constraint Rating
	east and south of Down Ampney	part of Down Ampney; Listed Down Ampney House; archaeology and historic landscape character.	remains and historic landscape character.	roads and heritage assets; retain and enhance existing vegetation and field boundaries; minimise impacts through layout and design; preserve historic landscape features where possible; and undertake archaeological assessment, evaluation and agreed mitigation prior to development.	
R644/657/658	New settlement to the south of Driffield	Driffield Conservation Area; listed buildings at Fosse Farm; archaeology and historic landscape character.	Loss of rural setting, archaeological remains and historic landscape character.	Retain undeveloped buffers and existing boundaries around sensitive heritage assets; preserve rights of way within green corridors and maintain key views; retain existing vegetation and woodland screening; maintain areas of open land around heritage assets; undertake archaeological assessment, evaluation and agreed mitigation prior to development.	Moderate
F20A	Land south-east of Fairford	Fairford Conservation Area; adjacent listed buildings Moor Farmhouse and Morgan Hall; and archaeology.	Loss of rural character, views and setting of the conservation area and nearby listed buildings, with loss of archaeological remains and historic landscape character.	Retain the western part of the site as open space; focus low-density development within the less sensitive eastern area; retain existing boundary planting and key views; use locally responsive vernacular design and materials; limit building heights; and undertake archaeological evaluation with agreed mitigation prior to development.	High

Site	Name	Principal Sensitivities	Potential Impact	Recommendations to reduce harm and maximise enhancement	Heritage Constraint Rating
F53A	Land at Totterdown Hill, Horcott	Listed buildings in Horcott comprising Bailiffs Cottage, Horcott House and Horcott Farmhouse; and archaeology.	Loss of rural setting of listed buildings, increased settlement coalescence with RAF Fairford, and loss of archaeological remains and historic landscape character.	Retain the north-eastern part of the site as green space; set development back from the northern boundary; retain existing hedgerows, trees and field boundary alignments; restrict building heights and use locally responsive vernacular design; and undertake archaeological survey, evaluation and agreed mitigation prior to development.	Moderate
K12	Land south-west of Kemble	Kemble Conservation Area; listed buildings including Church of All Saints, Kemble House and Home Farm; archaeology and historic landscape character.	Loss of rural setting of the conservation area and listed buildings, with loss of archaeological remains and historic landscape character.	Retain and enhance boundary vegetation; provide an undeveloped north-eastern buffer covering the area recommended for conservation area inclusion and key views; and undertake archaeological assessment, evaluation and agreed mitigation prior to development.	Moderate
L19	Land south of Butler's Court	Lechlade-on-Thames Conservation Area; listed buildings at Butler's Court and Green Farm; scheduled multi-period settlement; and archaeology.	Loss of rural setting, historic approach views and wider setting of Butler's Court. Loss of archaeological remains and historic landscape character.	Retain a grassland buffer along the A417; utilise a loose, spacious settlement pattern in the layout; retain and enhance existing hedgerows and boundary planting; use locally responsive vernacular design, materials and building heights; and implement any required archaeological mitigation and recording.	Moderate

Site	Name	Principal Sensitivities	Potential Impact	Recommendations to reduce harm and maximise enhancement	Heritage Constraint Rating
MK2B/C	Land north-east of Mickleton	Scheduled Meon Hill; and archaeology.	Introduction of development into views from scheduled monument; loss of views of scheduled monument from within site; and loss of archaeological remains and historic landscape character.	Undertake targeted archaeological evaluation with agreed mitigation prior to development; retain and enhance existing boundary vegetation; preserve open green space alongside the existing trackway; retain views of Meon Hill from public rights of way; and use locally responsive vernacular design and materials.	Moderate
M19C	Dunstall Farm, Fosseway	Listed Church of St David and Batsford Park; archaeology and historic landscape character.	Limited change to view from Batsford Park; loss of view from PROW looking towards the Church of St David; loss of archaeological remains and historic landscape character.	Undertake targeted archaeological evaluation with agreed mitigation; retain and enhance boundary vegetation; and retain long-distance views of the Church of St David from historic public rights of way.	Moderate
R519/650	Strategic extension to the south of Preston	Preston Conservation Area; listed buildings within Preston Conservation Area; scheduled Roman town of Corinium; listed buildings at Siddington House and	Loss of rural setting and settlement separation. Loss of archaeological remains, potentially associated with Corinium, and historic landscape character.	Retain green space buffer along the north-western edge of the site; focus development within the less sensitive central and southern areas; reduce development density towards site edges; retain and enhance existing planting, hedgerows, field boundaries, parish boundaries and historic routes; preserve	Moderate

Site	Name	Principal Sensitivities	Potential Impact	Recommendations to reduce harm and maximise enhancement	Heritage Constraint Rating
		Forty Farm; archaeology and historic landscape character.		key views and settlement separation; reflect the alignment of Ermin Street within the layout; use locally responsive vernacular design and restricted building heights; design employment areas to reflect agricultural character; prepare a sensitive masterplan in accordance with the Cotswold Design Code; and undertake archaeological survey, evaluation and agreed mitigation prior to development.	
R592	Land at Springfield Road	Quenington Conservation Area and three listed buildings within the conservation area; and archaeology.	Loss of rural setting and erosion of plan form of Quenington Conservation Area and associated listed buildings; and loss of archaeological remains and historic landscape character.	Retain eastern/south-eastern green space; focus low-density development to the north and west; avoid estate-style layouts; retain mature trees and boundary planting; soften development edges; use locally responsive design and restricted heights; and undertake archaeological evaluation with agreed mitigation.	High
SD17	Land east of Siddington Road and west of Bluebell Drive	Listed Church of St Peter; Listed buildings and scheduled monument at Church Farm; and archaeology.	Erosion of part of the rural setting of the listed buildings and scheduled monument at Church Farm. Loss of archaeological	Retain the southern and western parts of the site as green space; focus development within the less sensitive northern and eastern areas; retain key views of the church and Church Farm; retain and enhance existing hedgerows, trees and boundary planting; use locally	Moderate

Site	Name	Principal Sensitivities	Potential Impact	Recommendations to reduce harm and maximise enhancement	Heritage Constraint Rating
			remains and historic landscape character.	responsive vernacular design and restricted building heights; and undertake archaeological evaluation with agreed mitigation prior to development.	
S55B	Remainder of site at Tall Trees, Oddington Road	Stow-on-the-Wold with Maugersbury Conservation Area; Listed Enoch's Tower; and archaeology.	Erosion of the rural setting of the conservation area and Enochs Tower. Loss of archaeological remains and historic landscape character. Cumulative impact on the rural setting of the conservation area with S68.	Undertake archaeological assessment, survey and evaluation with agreed mitigation prior to development; retain existing boundaries, vegetation and walling; set development back from Oddington Road and Maugersbury Road; retain an open green buffer along the north-eastern edge of the site; reduce development density at site margins; use locally responsive vernacular design in accordance with relevant design codes; and maintain the prominence and setting of Enoch's Tower.	High
S68	The Hollies	Stow-on-the-Wold and Maugersbury Conservation Area. Non-designated Swells Villa; and archaeology.	Erosion of open rural setting of the conservation area. Loss of settlement edge rural character of Swells Villa. Loss of archaeological remains and historic landscape character.	Undertake archaeological assessment, survey and evaluation with agreed mitigation prior to development; retain existing stone walls, boundary vegetation and planting; replace any demolished buildings with development of a similar scale and density; retain open space buffers along key frontages; set development back from sensitive boundaries; and use locally responsive	Moderate

Site	Name	Principal Sensitivities	Potential Impact	Recommendations to reduce harm and maximise enhancement	Heritage Constraint Rating
			Cumulative impact on the rural setting of the conservation area with S55B	vernacular design in accordance with relevant design codes.	

5 STRATEGIC OVERVIEW

5.1 Strategic Heritage Context

- 5.1.1 The HIAs for the proposed site allocations demonstrate that the proposed allocations interact with the historic environment in a range of ways. While some sites have limited heritage sensitivities, others have the potential to affect designated and non-designated heritage assets through changes to setting, direct impacts on archaeological remains, or alteration of historic landscape character.
- 5.1.2 The main issue to arise from the HIAs is that the undeveloped agricultural land surrounding many of the settlements in the district plays a role in preserving historic settlement form, and allows settlements to be appreciated as distinct rural communities. Many of the impacts identified within the HIAs, would arise from the loss of connection between the settlements and/or their rural setting and settlement coalescence. Where appropriate, policy wording, should seek to ensure that this connection is preserved within any new development.
- 5.1.3 Allocations with a 'high' heritage constraint level have the potential to cause harm to the setting of designated heritage assets (e.g. conservation areas, listed buildings, registered parks and gardens or scheduled monuments) and/or could result in direct impact upon these assets as is the case in C190. While allocations with 'moderate' heritage constraints level may also affect the setting of designated heritage assets, this effect is likely to be lesser and could be reduced or removed through appropriate mitigation measures. Allocations with 'lower' heritage constraint levels, such as B56, are unlikely to significantly change the setting of designated heritage assets but may require further archaeological evaluation and recording.
- 5.1.4 The scale of the allocation alone does not determine its heritage constraint level. Some larger allocations have been allocated a 'moderate' heritage constraint, where design mitigation could help to manage impacts (i.e. DA5-DA32, R644/657/658, K12, C164A, R519/650), while some smaller allocations are considered to have a 'high' heritage constraint because of their relationship with nearby heritage assets (F20A, R592, S55B).

5.2 Recurring Heritage Sensitivities

- 5.2.1 The HIAs have identified a number of recurring heritage sensitivities, resulting from loss of rural land. This is most apparent where proposed allocations contribute to the setting of historic settlements, conservation areas, listed buildings or scheduled monuments. This occurs mostly on settlement edges where new development can affect, views on the approach into settlements, historic plan form, and in areas where the relationship between built form and historically associated agricultural land remains legible.
- 5.2.2 A second recurring issue is the effect of larger allocations on historic landscape character. Large sites such as DA5-DA32, C164A, C190, R644/657/658, K12, R519/650, R538 and M19C have the potential to result in

loss of historic field boundaries and enclosure patterns and ridge and furrow earthworks and would result in the introduction of large areas of development into formerly agricultural landscapes. This would result in the loss of low/locally significant historic landscape character types. Across these sites, the HIAs emphasise the importance of, where possible, retaining undeveloped margins, existing field boundaries, green corridors, historic routes and using lower-density or locally responsive design at sensitive edges.

5.2.3 Archaeological sensitivity is present across many of the allocations, although it varies in degree. C190 is the most archaeologically sensitive site, containing a scheduled monument, while other allocations have the potential to contain assets which would contribute to the setting of nearby scheduled monuments (C164A, R519/650, L19). Common recommendations for managing archaeological sensitivity are preserving nationally significant remains such as scheduled monuments in situ and protecting significant settings or views using open space and buffers.

5.2.4 Other allocations such as DA5-DA32 are known to contain non-designated archaeological remains and/or have the potential to contain previously unidentified remains. The majority of the allocations will require early archaeological assessment and targeted evaluation, to be submitted alongside any planning application for the site. This information will be used to develop an appropriate archaeological mitigation strategy.

5.3 Cumulative Effects

5.3.1 The clearest cumulative effects arise around Preston and the southern edge of Cirencester. C164A and R519/650 would affect Preston Conservation Area and its rural setting from different directions, while also introducing change close to the scheduled Roman town of Corinium and nearby listed buildings. Individually, each allocation would affect settlement separation, rural setting and historic landscape character; together, they increase the risk of perceived coalescence between Preston and Cirencester. Green infrastructure, retained routes, boundary planting and green space buffers should be secured through allocation-specific policy wording.

5.3.2 A smaller-scale cumulative issue is evident at Stow-on-the-Wold, where S55B and S68 would both contribute to incremental change on the rural edge of Stow-on-the-Wold and Mangersbury Conservation Area. The principal concern is piecemeal erosion of settlement-edge character. Consistent requirements for setbacks, open buffers, retention of stone walls and planting, and locally responsive design would help manage these effects.

5.4 Issues Potentially Relevant at Examination

5.4.1 The principal issue likely to be relevant at Examination is whether the proposed mitigation measures are sufficient to reduce the heritage impacts of the allocations to an acceptable level. The Section 4 table demonstrates that ratings are based not only on development scale but on the significance of affected heritage assets, the contribution made by the site to that significance, the likely extent of harm, and the realistic scope for mitigation. Examination is therefore likely to focus on whether the identified design,

- layout, landscape and archaeological measures are capable of avoiding or sufficiently reducing harm in practice, particularly for those allocations assessed as having a high heritage impact.
- 5.4.2 The approach taken to Ampney Crucis is likely to be relevant in this regard. As a result of the HIA findings, Ampney Crucis (R538B/C/D) is no longer proposed for allocation. This demonstrates that heritage considerations have directly informed the site selection process.
- 5.4.3 The high-rated allocations are likely to require the closest scrutiny. C190 raises particular issues because of the scheduled settlement south-east of Chesterton Farm and the need to avoid direct and indirect harm, which could be reduced through open-space retention, buffers and archaeological mitigation. At Quenington (R592), Fairford (F20A), and Stow (S55B) the close relationships between these allocations and the adjacent conservation areas and nearby listed buildings, raises questions as to whether the proposed mitigation measures would be sufficient to avoid substantial harm. While proposed landscape and design measures could reduce impacts, Examination may consider whether these effects can be fully mitigated.
- 5.4.4 The allocations around Preston and Cirencester (C164A and R519/650) while individually assessed as having a 'moderate' heritage constraint rating may present an issue as a result of their scale and their combined impact upon the Preston Conservation Area, historic settlement pattern and the rural setting of listed buildings. While mitigation for each site is proposed through landscape structure, retained open space, buffers and design controls, Examination may consider whether the cumulative impacts of both allocations on the setting of the conservation area can be satisfactorily mitigated.
- 5.4.5 A smaller cumulative issue arises at Stow-on-the-Wold, where S55B and S68 would contribute to incremental change on the rural edge of Stow-on-the-Wold and Mangersbury Conservation Area.
- 5.5 Conclusion**
- 5.5.1 This report summarises the findings of 17 HIAs prepared for potential site allocations within the emerging Cotswold Local Plan. The sites assessed comprise a combination of large strategic residential and mixed-use allocations at Ampney Crucis, Cirencester, Down Ampney, Driffield, Kemble and Preston, together with a number of smaller residential allocations located on the edge of existing settlements including Bourton-on-the-Water, Fairford, Horcott, Lechlade, Mickleton, Moreton-in-Marsh, Quenington, Siddington and Stow-on-the-Wold.
- 5.5.2 The assessments demonstrate that heritage sensitivities are not evenly distributed across the proposed allocations. Key sensitivities across the allocations relate to the contribution made by undeveloped agricultural land to the setting of conservation areas, listed buildings and scheduled monuments; the preservation of historic settlement form and settlement separation; the retention of historic landscape character; and the presence of known or potential archaeological remains.

- 5.5.3 Of the 17 sites assessed, five allocations were assigned a high heritage constraint rating (R538B/C/D, C190, F20A, S55B and R592), eleven allocations were assigned a moderate heritage constraint rating, and one allocation (B56) was assigned a lower heritage constraint rating. Heritage constraint ratings are influenced by the significance of affected heritage assets, the contribution made by the site to that significance, the likely scale of impact and the potential for mitigation, rather than by development scale alone.
- 5.5.4 The assessments also identify cumulative effects arising from multiple allocations. Cumulative effects occur around Preston and the southern edge of Cirencester, where allocations C164A and R519/650 have the potential to affect Preston Conservation Area, the setting of the scheduled Roman town of Corinium, settlement separation and rural landscape character. Smaller-scale cumulative effects have been identified at Stow-on-the-Wold, where allocations S55B and S68 would contribute to incremental change along the settlement edge.
- 5.5.5 A number of the assessments identify opportunities for heritage-informed place-shaping. Across many of the allocations, recommendations have been made to draw upon the historic character of settlements through the use of locally distinctive layouts, building forms, materials and landscape features, helping new development respond positively to its historic context. The assessments also emphasise the retention of historic routes, field boundaries, vegetation and key views where these contribute to local character and sense of place. In some instances, additional opportunities have been identified, including the incorporation of archaeological interpretation within new development and, at C190, the retention of the scheduled monument within open space, helping to secure its long-term conservation as part of the wider development framework.

APPENDIX A: BIBLIOGRAPHY

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