

Land at Pamington.

Pamington, Tewkesbury, Gloucestershire

Heritage Statement

On behalf of Greystoke Land.

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1. Introduction

- 1.1. Pegasus Group have been commissioned by Greystoke Land Ltd to prepare a Heritage Statement to consider the proposed residential development at Pamington, Tewksbury, as shown on the Site Location Plan provided at Plate 1.



Plate 1 Site Location Plan

- 1.2. The site is located to the south-east of the village of Paminton, Tewkesbury in an area of arable land divided by hedgerows.

- 1.3. The proposed development seeks permission for:

“Residential development providing up to 175 new homes; vehicular and non-vehicular access from B4079; pedestrian and cycle access onto Pamington Lane west of Tudor Cottage; foul and storm water drainage infrastructure; provision of green infrastructure including public open space; associated services infrastructure for utilities. All matters of detail reserved for subsequent approval (except the vehicular and non-vehicular access from the B4079 and the pedestrian/cycle access from Pamington Lane to the west of Tudor Cottage).”

- 1.4. This Assessment provides information with regards to the significance of the historic environment to fulfil the requirement given in paragraph 194 of the Government's *National Planning Policy Framework* (the *NPPF*) which requires:

“...an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting”.¹

¹ Department for Levelling Up, Housing and Communities (DLUHC), *National Planning Policy Framework (NPPF)* (London, July 2021), para. 194.



- 1.5. In order to inform an assessment of the acceptability of the scheme in relation to impacts on the historic environment, following paragraphs 199 to 203 of the *NPPF*, any harm to the historic environment resulting from the proposed development is also described, including impacts on significance through changes to setting.
- 1.6. As required by paragraph 194 of the *NPPF*, the detail and assessment in this Report is considered to be "*proportionate to the assets' importance*".²
- 1.7. A pre-application meeting was held with Tewkesbury District Council in September 2023, and a pre-application response received in October 2023. This made no specific comments with regards to heritage beyond stating that four Listed buildings were noted in the Pre-Application Appraisal provided to them.

² DLUHC, *NPPF*, para. 194.



2. Proposed Development

2.1. The application seeks outline planning permission for the residential development of the site.

2.2. The proposals are detailed on the following plans, which are the basis for the application:

- 23122.301 Parameter Plan Land Use Rev B
- 23122.302 Parameter Plan Building Height Rev B
- 23122.303 Parameter Plan Access and Movement Rev B
- 23122.304 Parameter Plan Green Infrastructure Rev B

2.3. In addition, the following illustrative plans have been considered:

- 23122.101 Illustrative Masterplan Rev F
- 23122.201 Illustrative Landscape Strategy

2.4. The evolution of the masterplan taken account of the heritage assets in the vicinity of the site, specifically the setting of Listed buildings in the vicinity.

3. Site Description and Planning History

Site Description

- 3.1. The main area of the site comprises two arable agricultural fields, divided by hedges (Plate 2).



Plate 2 Looking south across the site

Site Development / Map Regression

- 3.2. No Tithe Map survives for the proposed development area and the village of Pamington.
- 3.3. Historic mapping of 1884 of the site shows it as agricultural land with field divisions on their current alignments and residential properties to the north of the site. An orchard is recorded to the north of the site, which has now largely been redeveloped as houses and their associated curtilages.

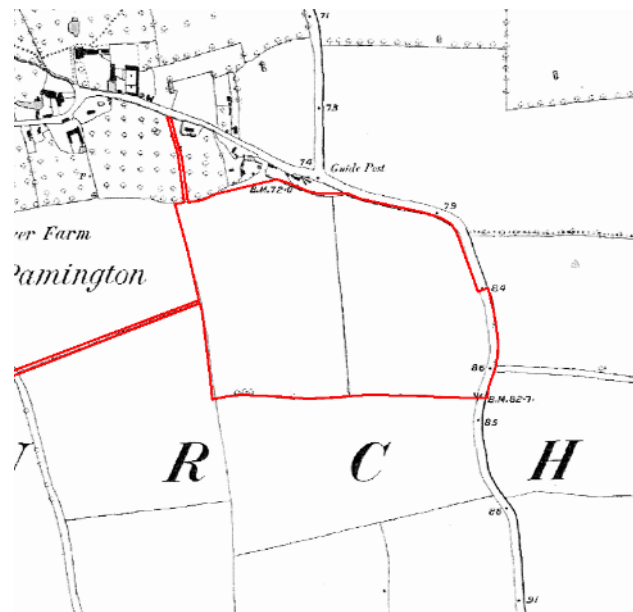


Plate 3: 1884 OS Map

- 3.4. By 1955 a small agricultural structure had been erected in the south-western area of the field with more buildings erected to the north of the Site.

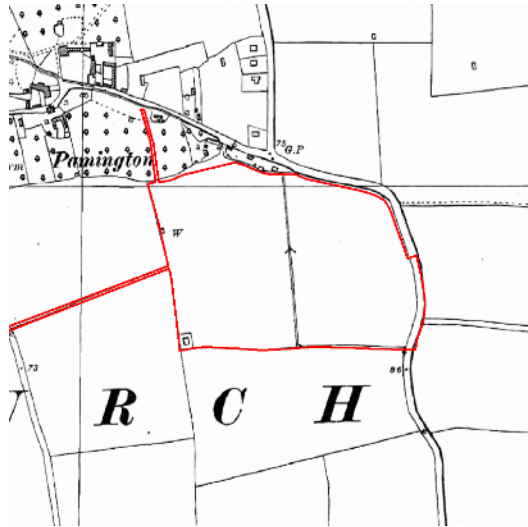


Plate 4: 1955 OS Map

- 3.5. The 1987 OS map shows further residential development located to the north the Site in the village of Pamington with the orchard now divided into separate plots, some of which have been cleared of trees with sporadic trees noted in the remainder of the former orchard area.

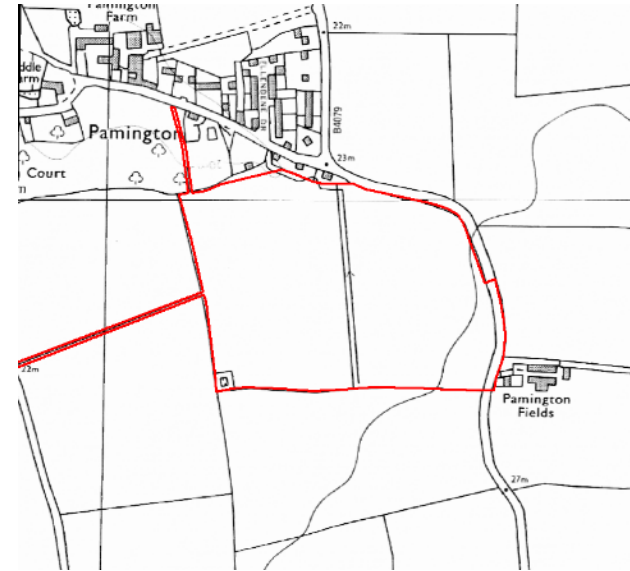


Plate 5: 1987 OS Map

Planning History

- 3.6. No relevant planning history has been identified on the Tewkesbury Online Planning Register.

4. Methodology

4.1. The aims of this Report are to assess the significance of the heritage resource within the site/study area, to assess any contribution that the site makes to the heritage significance of the identified heritage assets, and to identify any harm or benefit to them which may result from the implementation of the development proposals, along with the level of any harm caused, if relevant.

4.2. This assessment considers built heritage and archaeological potential.

Sources

4.3. The following key sources have been consulted as part of this assessment:

- The Gloucestershire Historic Environment Record (HER) for information on the recorded heritage resource within the vicinity of the site;
- The National Heritage List for England for information on designated heritage assets;
- Historic maps available online;
- Aerial photographs available online via Historic England's Aerial Photo Explorer and Britain from Above;
- Historic England's Aerial Archaeology Mapping Explorer;
- The Gloucestershire Archives online catalogue;

- Old photographs accessible via the Historic England Architectural Red Box Collection; and
- Other online resources, including Ordnance Survey Open Source data; geological data available from the British Geological Survey and Cranfield University's Soilscales Viewer; Google Earth satellite imagery; and LiDAR data from the Environment Agency.

4.4. A gazetteer of recorded sites and findspots is included as **Appendix 1** and maps illustrating the resource and study area are included as **Appendix 2**.

4.5. Historic cartographic sources and aerial photographs were reviewed for the site, and beyond this where professional judgement deemed necessary.

4.6. Heritage assets in the wider area were assessed as deemed appropriate.

Site Visit

4.7. A site visit was undertaken by a Heritage Consultant from Pegasus Group on 24th July 2023, during which the site and its surrounds were assessed.

Photographs

4.8. Photographs included in the body text of this Report are for illustrative purposes only to assist in the discussions of heritage assets, their settings, and views, where relevant. Unless explicitly stated, they are not accurate visual representations of the site or development

proposals nor do they conform to any standard or guidance i.e., the Landscape Institute Technical Guidance Note O6/19. However, the photographs included are intended to be an honest representation and are taken without the use of a zoom lens or edited, unless stated in the description or caption.

Assessment Methodology

4.9. Full details of the assessment methodology used in the preparation of this Report are provided within **Appendix 3**. However, for clarity, this methodology has been informed by the following:

- ClfA's *Standard and Guidance for Historic Environment Desk-Based Assessment*;³
- *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment* (hereafter *GPA:2*);⁴
- *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) – The Setting of*

Heritage Assets, the key guidance of assessing setting (hereafter *GPA:3*);⁵

- *Historic England Advice Note 1 (Second Edition) – Conservation Area Appraisal, Designation and Management* (hereafter *HEAN:1*).⁶
- *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (hereafter *HEAN:12*);⁷ and
- *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*.⁸

Consideration of Harm

4.10. It is important to consider whether the proposals cause harm. If they do, then one must consider whether the harm represents "substantial harm" or "less than substantial harm" to the identified designated heritage assets, in the context of paragraphs 201 and 202 of the *NPPF*.⁹ With regard to non-designated heritage assets, potential harm should be considered within the context of paragraph 203 of the *NPPF*.¹⁰

³ Chartered Institute for Archaeologists (ClfA), *Standard and Guidance for Historic Environment Desk-Based Assessment* (revised edition, October 2020).

⁴ Historic England, *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment (GPA:2)* (2nd edition, Swindon, July 2015).

⁵ Historic England, *Historic Environment Good Practice Advice in Planning Note 3 – The Setting of Heritage Assets (GPA:3)* (2nd edition, Swindon, December 2017).

⁶ Historic England, *Historic England Advice Note 1 – Conservation Area Appraisal, Designation and Management (HEAN:1)* (2nd edition, Swindon, February 2019).

⁷ Historic England, *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets (HEAN:12)* (Swindon, October 2019).

⁸ English Heritage, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008).

⁹ DLUHC, *NPPF*, paras. 201 and 202.

¹⁰ DLUHC, *NPPF*, para. 203.

- 4.11. The *PPG* clarifies that within each category of harm ("*less than substantial*" or "*substantial*"), the extent of the harm may vary and should be clearly articulated.¹¹
- 4.12. The guidance set out within the *PPG* also clarifies that "*substantial harm*" is a high test, and that it may not arise in many cases. It makes it clear that it is the degree of harm to the significance of the asset, rather than the scale of development which is to be assessed.¹² In

addition, it has been clarified in a High Court Judgement of 2013 that substantial harm would be harm that would:

"...have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced."¹³

¹¹ DLUHC, *Planning Practice Guidance (PPG)*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).

¹² DLUHC, *PPG*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).

¹³ EWHC 2847, R DCLG and Nuon UK Ltd v. Bedford Borough Council.

5. Policy Framework

Legislation

- 5.1. Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and their settings and Conservation Areas.¹⁴
- 5.2. In addition to the statutory obligations set out within the aforementioned Act, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.¹⁵
- 5.3. Full details of the relevant legislation are provided in **Appendix 4**.

National Planning Policy Guidance

- 5.4. National Planning Policy guidance relating to the historic environment is provided within Section 16 of the Government's *National Planning Policy Framework* (NPPF),

an updated version of which was published in July 2021. The NPPF is also supplemented by the national *Planning Policy Guidance (PPG)* which comprises a full and consolidated review of planning practice guidance documents to be read alongside the NPPF and which contains a section related to the Historic Environment.¹⁶ The *PPG* also contains the *National Design Guide*.¹⁷

- 5.5. Full details of the relevant national policy guidance are provided within **Appendix 5**.

The Development Plan

- 5.6. Applications for Planning Permission are currently considered against the policy and guidance set out within the Tewksbury borough plan 2011- 2031 and the Joint Core Strategy 2011-2031.
- 5.7. Details of the policy specific relevant to the application proposals are provided within **Appendix 6**.

¹⁴ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

¹⁵ UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

¹⁶ Department for Levelling Up, Housing and Communities (DLUHC), *Planning Practice Guidance: Historic Environment (PPG)* (revised edition, 23rd July 2019), <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>.

¹⁷ Department for Levelling Up, Housing and Communities (DLUHC), *National Design Guide* (London, January 2021).

6. The Historic Environment

6.1. This section provides a review of the recorded heritage resource within the site and its vicinity in order to identify any extant heritage assets within the site and to assess the potential for below-ground archaeological remains.

6.2. A gazetteer of relevant heritage data is included as Appendix 1. Designated heritage assets and HER records are illustrated on Figures 1 to 3 in Appendix 2.

Previous Archaeological Works

6.3. The following archaeological works have been carried out within the site:

- Archaeological survey and excavation along the Cotswold Spring supply trunk main (112956); and
- A desk-based assessment, geophysical survey and evaluation associated with the Gloucester Security of Supply Pipeline (112833 and 112837).

6.4. In the wider study area, the following archaeological works have been carried out:

- Environmental Impact Assessment, geophysical survey and archaeological trenching of a proposed solar array site at Starveall Farm, Claydon, Ashchurch (81963, 81962 and 99269);

- Desk based assessment, magnetometry survey and archaeological trenching and watching brief at Land off the A46, Ashchurch (85941, 99297 and 112839);
- Desk based assessment and Level 2 historic building record at Ashchurch MOD base, Tewkesbury (106407); and
- Desk-based assessment, geophysical survey and watching brief for Wormington to Tirley gas pipeline (112685, 112686 and 96874).

6.5. The results of these works are discussed below, where relevant to the potential archaeological resource of the site.

Topography and Geology

6.6. The site is comprised of an area of broadly flat agricultural land.

6.7. The bedrock across the site is comprised of Charmouth Mudstone Formation, a sedimentary bedrock formed between 199.3 and 182.7 million years ago during the Jurassic period. There are no records for superficial geology within the Site boundaries.¹⁸

¹⁸ British Geological Survey, *Geology of Britain Viewer*, <https://www.bgs.ac.uk/map-viewers/geology-of-britain-viewer/>.

- 6.8. The soils across the site are comprised of a lime-rich loamy and clayey soils with impeded.¹⁹

Geophysical survey

- 6.9. A geophysical survey was carried out over the site by SUMO Geophysics Ltd on 15th September 2023 with the survey finding evidence of east to west running furrows across much of the site, as well as modern services transecting both fields. No archaeological features were noted.

Archaeological Baseline

Prehistoric (pre-43 AD)

- 6.10. There are no records of prehistoric activity within the Site boundaries, although there are records for a Palaeolithic hand axe (59784) as well as worked flints (104248) c. 560m north-west of the site. In addition to the find spots there are records for cropmarks (59771) of unknown age located c. 420m to the west of the site.
- 6.11. The remains of a mid to late Iron Age settlement comprising of a series of oval enclosures was uncovered during excavations for the Gloucester Security of Supply Water Pipeline (75157) located approximately 15m north-east of the site at its closest. There is no evidence from the geophysical survey to suggest that these remains extend into the site.
- 6.12. Across the wider region, the South West Archaeological Research Framework (SWARF) records that there were

few areas in the region not used or settled by the end of the Bronze Age. Evidence does show a preference for settlement in lowland areas, with a higher concentration of finds in these areas continuing into the Iron Age and evidence of metal working found around Tewksbury.

Romano-British (AD 43 - 410)

- 6.13. There are no records of Roman occupation within the site boundaries, but previous works carried out c.640m north of the site have identified evidence of Romano-British settlement during an evaluation and watching brief (82816). The remains uncovered comprised ditched boundaries likely to have been associated with livestock management as well as a T-shaped corn dryer. Earlier magnetometry survey of the site had identified a ladder settlement likely to date from the Roman period to the north-west of the area, although this was unaffected by the works.
- 6.14. No anomalies suggestive of significant Romano-British remains were recorded within the site during the geophysical survey.
- 6.15. To the south of the site, Gloucester functioned as a Colonia in the Roman period. Roman rural settlement has also been noted around Tewksbury.
- #### Early medieval (410 AD - 1066) and Medieval (1066 - 1539)
- 6.16. The site is situated in an area where Medieval and post medieval ridge and furrow earthworks are recorded

¹⁹ Cranfield University, *Soilscapes*, <http://www.landis.org.uk/soilscapes/>.

(101757) covering the majority of the study area (95597, 102629, 103125 and 101777). The site visit and a review of LiDAR imagery suggests ridge and furrow earthworks do not survive within the site.

- 6.17. There are four records for medieval settlement within the wider study area comprising the records of a shrunken village (54636) c. 920m west of the site, the medieval settlement at Pamington (96614) c. 910m west of the site the location of Ashton on Carrant Medieval settlement (96613) c.840m north and earthworks of a medieval and post medieval settlement at Middle Farm Pamington (65082) c.220m north-west of the site.
- 6.18. No anomalies suggestive of significant early medieval or medieval remains were recorded within the site during the geophysical survey.
- 6.19. Timber halls dating to the early medieval period have been noted across Gloucestershire including at Holme Hill, Tewkesbury. However, the majority of the area was rural in character, often continuing in use from Roman rural settlements and farms.
- Post-medieval (1540 – 1750), Early Modern (1750 – 1901),
- 6.20. Post medieval furrows were recorded at the site during the geophysical survey. These are not considered to be heritage assets.
- 6.21. In the wider study area, two fieldnames of "*Curborough*" and "*Little Curborough*" are potentially indicative of archaeological remains, one c.30m north of the site in an area partly developed by modern housing (57771) with the other c.850m north-west of the site at its closest (57772).

- 6.22. The rural nature of the site and its surrounds in the post-medieval period is further demonstrated by other records comprising a sheep dipping pond uncovered during excavations (104249) and the site of a now-demolished water tower (59076) on the banks of the Tirl Brook located c.470m north west of the site.
- 6.23. There are two turnpike roads located within the study area including the Tewksbury to London (97826) and the Cleeve and Evesham route (101352), with the B4079 abutting the site to the north and east likely also to have formed part of the turnpike network.
- 6.24. SWARF notes that throughout the post medieval period to modern times Gloucestershire was an important area for food production, with agricultural improvements precipitating changes to the landscape in the area, such as field boundary removal.

Modern (1901 – present)

- 6.25. During the Second World War, the area north of Ashchurch was used as a depot for military vehicles, a prisoner of war (POW) camp, and a camp for the staff, with pillboxes and anti-aircraft batteries installed to defend the area. An anti-aircraft battery was possibly located within the site, though its exact location is unknown. No anomalies suggestive of such an installation were recorded during the geophysical survey.
- 6.26. The construction of industrial spaces associated with the war effort and the "second industrial revolution" is highlighted as an area requiring further investigation in SWARF.

Statement of Archaeological Potential and Significance

- 6.27. Whilst prehistoric and Romano-British remains have been recorded in proximity to the site, no anomalies suggestive of such remains extending into the site were recorded during the geophysical survey or archaeological investigations which have taken place within the site. The potential for significant remains of these dates within the site is low.
- 6.28. Likewise, no anomalies suggestive of significant early medieval, medieval or post-medieval remains have been recorded within the site on the geophysical survey, and the potential for significant remains of these dates is low. The below ground remains of furrows recorded during the geophysical survey are not considered to be heritage assets.

- 6.29. Whilst the possible location of an anti-aircraft battery has been recorded within the site on the HER, no anomalies suggestive of the below ground remains of such an installation were recorded on the geophysical survey and the potential for significant remains to be present is considered to be low.

Designated Heritage Assets

- 6.30. There are four Grade II Listed 17th-century, detached houses located to the north of the Site, the closest of these being approximately 5m east of the site.
- 6.31. Designated heritage assets in the vicinity of the site are considered in further detail in the Setting Assessment Section below.

7. Setting Assessment

- 7.1. Step 1 of the methodology recommended by the Historic England guidance *GPA:3* (see 'Methodology') is to identify which heritage assets might be affected by a proposed development.²⁰
- 7.2. Development proposals may adversely impact heritage assets where they remove a feature that contributes to the significance of a heritage asset or where they interfere with an element of a heritage asset's setting that contributes to its significance, such as interrupting a key relationship or a designed view.
- 7.3. Consideration was made as to whether any of the heritage assets present in the vicinity of the site include the site as part of their setting, and therefore may potentially be affected by the proposed development.
- 7.4. Assets in the vicinity identified for further assessment (Steps 2 to 4) on the basis of intervisibility and proximity comprise:
- The Grade II Listed The Thatched Cottage (Figure 2, 69238); and
 - The Grade II Listed The Stirrups (Figure 2, 77849).
 - The Grade II Listed Tudor Cottage (Figure 2, 72874).
- 7.5. Assets excluded on the basis of lack of intervisibility and lack of documented historic association comprise the

Grade II Listed The Elm Cottage (Figure 2, 76360). This is screened from the site by modern built form to the south. Sensitive development of the site would not cause harm to its heritage significance.

Step 2–4 Assessment – The Thatched Cottage (69238)

- 7.6. The Grade II Listed Thatched Cottage lies immediately to the north of the site, and has intervisibility with it (Plate 6).



Plate 6 Looking south-west to The Thatched Cottage

²⁰ Historic England, *GPA:3*, p. 4.

- 7.7. The Thatched Cottage was added to the National List at Grade II on 25th February 1987 (NHLE 1153211). The List Entry describes the building as follows:

"Detached cottage. C17. Probably timber-framed now pebble-dashed, weatherboarding towards apex of left gable end. Thatched roof with decorative ridge thatching, pebble-dashed stack with brick shaft. Two storey extension at left gable end with red tile roof. Rectangular plan to main body. Flat-roofed extension at left gable end and C20 porch with corrugated asbestos roof not of special interest. 1½ storeys. Two 2-light casements to ground floor of garden front. Three-light eyebrow dormer. Access via C20 studded panelled door within C20 porch. Large projecting stack at right gable end with shaft set away from gable end, another stack from front left-hand corner. Interior; tie beams with deep flat chamfers. Open fireplace with bressumer."

- 7.8. The western extension of the asset appears to have been entirely rebuilt very recently.
- 7.9. The Enclosure Map of Pamington shows the asset within a small roadside curtilage (Plate 7). It is most probable to have originated as a small dwelling established within roadside waste, with no wider landholding.

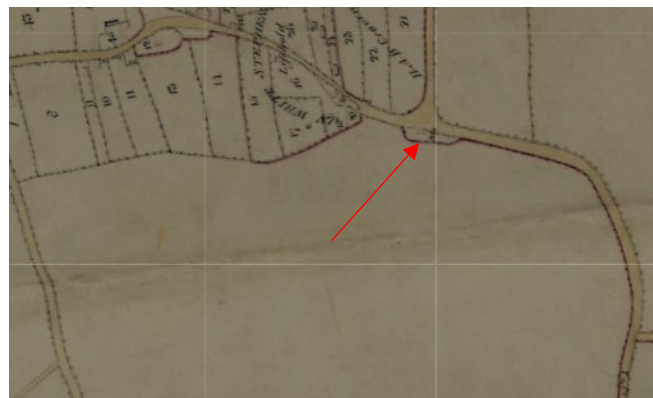


Plate 7 Extract from the Enclosure Map

- 7.10. By the publication of the Ordnance Survey map of 1885 (Plate 8), the cottage still lay in a small curtilage, with further dwellings to the west.

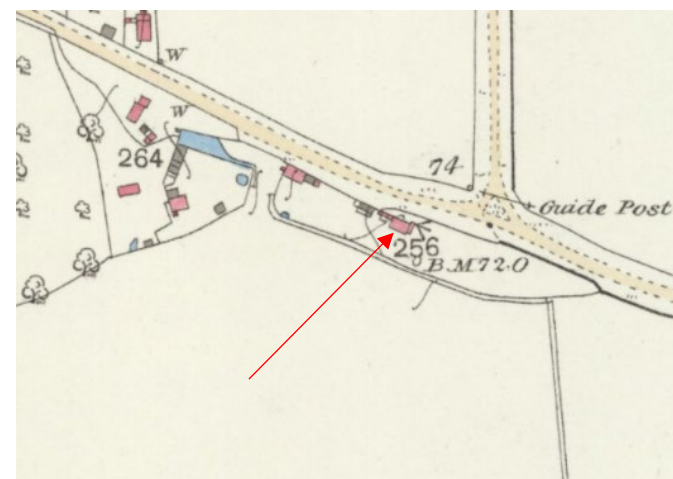


Plate 8 Extract from the Ordnance Survey map of 1885

- 7.11. The Thatch is depicted with little change on the Third Edition Ordnance Survey map of 1923, although some of the small cottages to the west had been demolished (Plate 9).

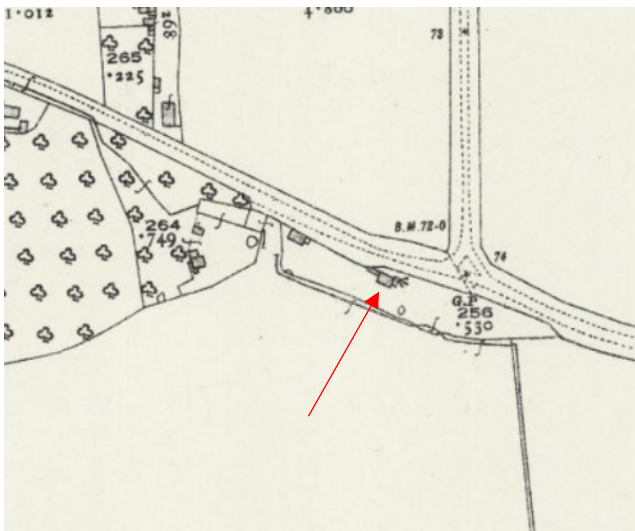


Plate 9 Extract from the Ordnance Survey map of 1923

- 7.12. Today, the original cottage is much extended with an extension to the west, and flanked by more recent sizeable dwellings, including within its former curtilage (Plate 10).



Plate 10 Recent aerial photograph

- 7.13. The asset is best appreciated from the road to the north (Plate 6, above), and blocked up doorway was noted in the northern façade of the building, most likely indicating the historic primary entrance. From the road, there are also glimpses to the agricultural land of the site beyond (Plate 11).



Plate 11 Looking south to the Thatch and agricultural land beyond

- 7.14. The rear of the asset has intervisibility with the land of the site to the south (Plate 12).



Plate 12 Looking north-west to The Thatch from within the site

- 7.15. There is no documented historic association between the site and the asset.

Statement of Significance

- 7.16. The Grade II Listing of the building highlights it is a heritage asset of the less than the highest significance as defined by the *NPPF*.²¹
- 7.17. The heritage significance of the asset is principally embodied in its physical fabric, which has architectural, artistic and historic interests.

²¹ DLUHC, *NPPF*, para. 200.

7.18. The setting of the asset also contributes to the significance of the asset, although the significance derived from the setting is less than that derived from its historic fabric. The principal elements of the physical surrounds and experience of the asset (its "setting") which are considered to contribute to its heritage significance comprise:

- The remaining associated curtilage, from where the architectural interest of the asset can be understood.
- The road to the north from where the architectural interest of the asset can be understood, and from where its origins as a small road-side cottage can be appreciated.

7.19. The site lies beyond these areas. It has no documented historic association with the asset, but it does have clear intervisibility and co-visibility with it, and does hold some historic illustrative value as to the rural location of the asset historically. As such, the site makes a minor contribution to the heritage significance of the asset through setting.

7.20. The parameters plans indicate that whilst the red line of the site lies close to the asset, development will be set well back from The Thatch, over 100m to the south, with the illustrative masterplan showing built form lying beyond a Village Green character area including orchard planting which is historically appropriate for the vicinity of the settlement.

7.21. As such, the change of character of the area to the south of the asset, and the introduction of built form beyond it, with built form set back and views softened by planting,

will result in only less than substantial harm to the heritage significance of the asset at the low end of that spectrum.

Step 2-4 Assessment – The Stirrups (77849)

7.22. The Grade II Listed The Stirrups (Plate 13) lies approximately 170m to the north of the main area of the site, although the red line of the site extends to within approximately 50m of the asset.



Plate 13 Looking east to The Stirrups

7.23. The Stirrups was added to the National List at Grade II on 27th May 1981 (NHLE 1091925). The List Entry describes the building as follows:

"Detached cottage. C17. Square-panelled timber-framing with some curved bracing, rendered infill. Thatched roof with decorative ridge thatching with

brick, partly rendered stacks. Rectangular main body with large projecting stacks at gable ends. 1½ storeys. Upper floor lit by two, 2-light eyebrow dormers. Single light, 2 and 3-light casements to ground floor. Large projecting stacks at both gable ends. Stack at left gable end double. Lean-to porch with C20 glass door with glazing bars to right of stack. Interior not inspected."

- 7.24. The Enclosure Map of Pamington (Plate 14) shows the asset within a small curtilage running back from the road, as does the First Edition Ordnance Survey map of 1885 (Plate 15).

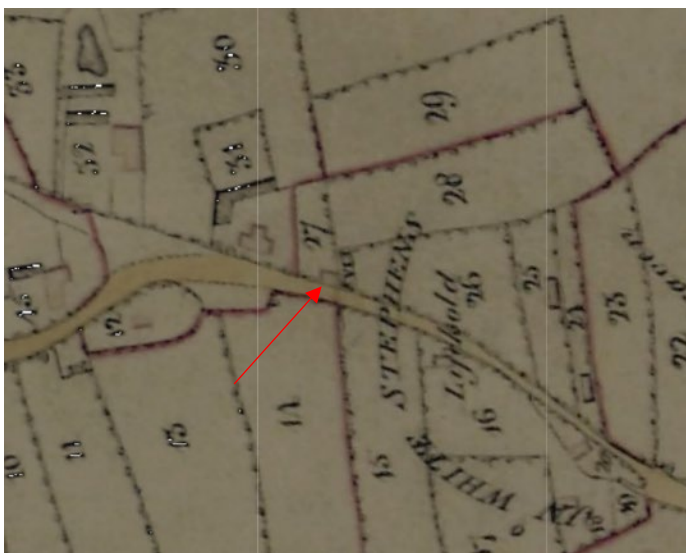


Plate 14 Extract from the Enclosure Map

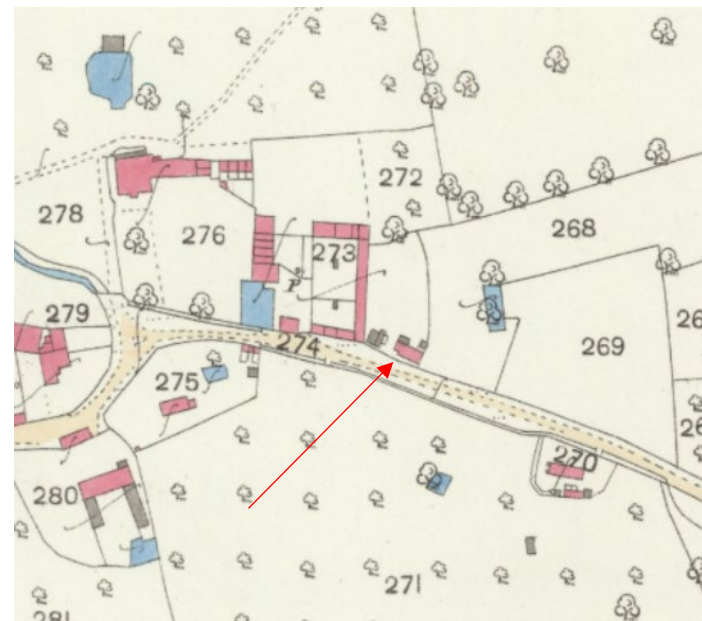


Plate 15 Extract from the Ordnance Survey map of 1885

- 7.25. Later mapping and aerial photographs show little change to the asset and the extent of its curtilage, although a modern outbuilding now lies in the north-western area of the plot. Modern housing now lies to the north-east and south-east of the asset (Plate 16).
- 7.26. The field to the south remains agricultural in character, separated from the asset by the road and a hedge (see Plate 13, above).
- 7.27. The asset is best appreciated from the road to the south (Plate 13, above), which it was clearly sited to face onto.
- 7.28. There is no documented historic association between the site and the asset.

Statement of Significance

7.29. The Grade II Listing of the building highlights it is a heritage asset of the less than the highest significance as defined by the *NPPF*.²²

7.30. The heritage significance of the asset is principally embodied in its physical fabric, which has architectural, artistic and historic interests.

7.31. The setting of the asset also contributes to the significance of the asset, although the significance derived from the setting is less than that derived from its historic fabric. The principal elements of the physical surrounds and experience of the asset (its "*setting*") which are considered to contribute to its heritage significance comprise:

- The associated curtilage, which appears to reflect the extent of the historic curtilage and from where the architectural interest of the asset can be understood. This also has illustrative value in suggesting that the asset was historically of higher status than originating as a dwelling established on roadside wasteland.
- The road to the south from where the architectural interest of the asset can be understood, and from where the asset appears to have been designed to be appreciated from.

7.32. The site lies beyond these areas. It has no documented historic association with the asset.

7.33. The majority of the site lies at distance from the asset, with only a small part of the field to the south lying within the red line. The absence of built form from the field to the south contributes to the heritage significance of the asset through setting, as whilst it is visually screened from the asset by a hedge, the absence of built form is perceptible and illustrates the rural location of the asset.

7.34. The parameters plans and illustrative masterplan indicate that whilst the red line of the site lies close to the asset, the closest land use will be a pedestrian/cycle access which will perpetuate the overall character of the field to the south as being free of built form, and will cause no harm to the heritage significance of the asset through changes in setting, taking into account the existing road-side location of the asset.

7.35. The establishment of built form within the main area of the site will be in areas not anticipated to be visible from the asset, and at some distance from it. This will cause no harm to the heritage significance of the asset through setting.

Step 2-4 Assessment – The Tudor Cottage (72874)

7.36. The Grade II Listed Tudor Cottage (Plate 16) lies approximately 115m to the north of the main area of the site, although the red line of the site extends immediately to the west of the curtilage of the asset.

²² DLUHC, *NPPF*, para. 200.



Plate 16 Looking south-east to The Tudor Cottage

7.37. The Tudor Cottage was added to the National List at Grade II on 25th February 1987 (NHLE 134431). The List Entry describes the building as follows:

"Detached cottage. C17. Square-panelled timber-framing with rendered infill. Thatched roof with decorative ridge thatching. Rectangular plan with later projecting porch off-centre right. Outbuilding at right gable end and garage and linking wall at left gable end not of special interest. 1½ storeys with three, 3-light eyebrow dormers to first floor. Four and 3-light casements to ground floor, all with leaded panes. Part-glazed porch off-centre right with plank door. Brick stack off the ridge. Interior not inspected."

7.38. The Enclosure Map of Pamington (Plate 17) shows the asset within a small immediate curtilage with a wider landholding to the south.

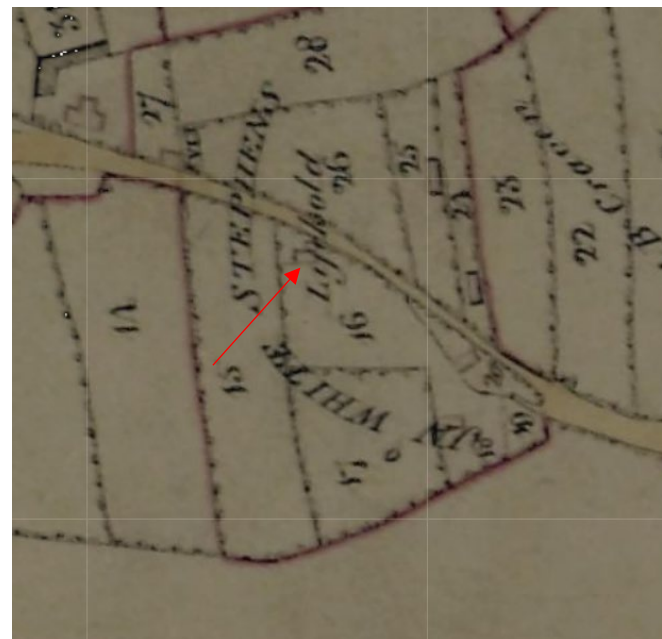


Plate 17 Extract from the Enclosure Map

7.39. The First Edition Ordnance Survey Map shows the situation of the asset as much changed, then being two cottages surrounded by one larger orchard enclosure (Plate 18).

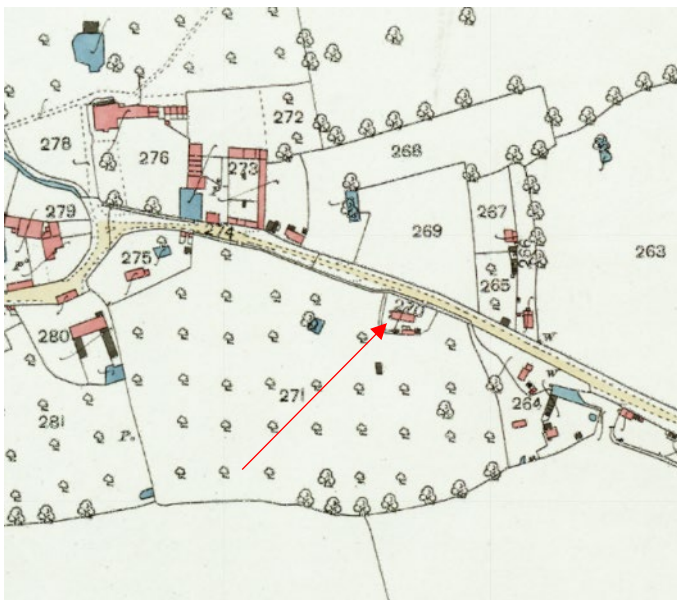


Plate 18 Extract from the Ordnance Survey map of 1885

- 7.40. Later mapping and aerial photographs show the extension of the curtilage of the asset to form a long enclosure running back south from the road, and the establishment of modern dwellings to the east and north (Plate 19).

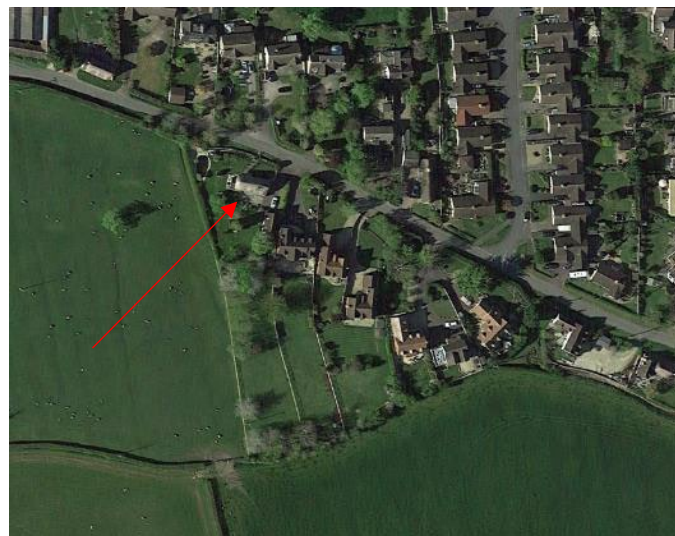


Plate 19 Modern aerial photograph

- 7.41. The field to the west remains agricultural in character, albeit now open pasture, separated from the asset by a hedge and mature vegetation.
- 7.42. The northernmost spur of the site appears to have been historically associated with the asset, although this relationship is now severed and no longer legible.

Statement of Significance

- 7.43. The Grade II Listing of the building highlights it is a heritage asset of the less than the highest significance as defined by the *NPPF*.²³

²³ DLUHC, *NPPF*, para. 200.

- 7.44. The heritage significance of the asset is principally embodied in its physical fabric, which has architectural, artistic and historic interests.
- 7.45. The setting of the asset also contributes to the significance of the asset, although the significance derived from the setting is less than that derived from its historic fabric. The principal elements of the physical surrounds and experience of the asset (its "setting") which are considered to contribute to its heritage significance comprise:
- The associated curtilage which although much changed from its historic extent is an area from where the architectural interest of the asset can be understood.
 - The road to the north from where the architectural interest of the asset can be understood, and from where the asset appears to have been designed to be appreciated from.
- 7.46. The site lies beyond these areas. The northern spur lies in an area which appears to have been historically associated, although this association is no longer legible, and the character of the area has changed.
- 7.47. The absence of built form from the field to the west, which is crossed by the northern spur of the site, contributes to the heritage significance of the asset through setting, as the absence of built form is perceptible and illustrates the rural location of the asset, albeit of changed extent and character.
- 7.48. The parameters plans and illustrative masterplan indicate that whilst the northern spur of the site lies close to the asset, this area will be a pedestrian cycle access which will perpetuate the overall character of the field to the west as being free of built form, and will cause no harm to the heritage significance of the asset through changes in setting, taking into account the existing roadside setting of the asset.
- 7.49. The establishment of built form within the main area of the site will be approximately 200m from the asset, beyond the extensive curtilage of the asset, and intervening planting. This will cause no harm to the heritage significance of the asset through setting.

8. Conclusions

- 8.1. Whilst prehistoric and Romano-British remains have been recorded in proximity to the site, no anomalies suggestive of such remains extending into the site were recorded during the geophysical survey or archaeological investigations which have taken place within the site. The potential for significant remains of these dates within the site is low.
- 8.2. Likewise, no anomalies suggestive of significant early medieval, medieval or post-medieval remains have been recorded within the site on the geophysical survey, and the potential for significant remains of these dates is low. The below ground remains of furrows recorded during the geophysical survey are not considered to be heritage assets.
- 8.3. Whilst the possible location of an anti-aircraft battery has been recorded within the site on the HER, no anomalies suggestive of the below ground remains of such an installation were recorded on the geophysical survey and the potential for significant remains to be present is considered to be low.
- 8.4. The proposed development is anticipated to cause less than substantial harm at the lower end of the spectrum to the Grade II Listed The Thatch. Whilst the asset lies close to the red line of the site, the built form of the development will be set back from the building, with the illustrative masterplan showing built form beyond historically appropriate orchard in a village green character area.

Sources

Legislation
UK Public General Acts, Ancient Monuments and Archaeological Areas Act 1979.
UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.
UK Public General Acts, Planning and Compulsory Purchase Act 2004.

Policy and Guidance
Chartered Institute for Archaeologists (CIfA), <i>Standard and Guidance for Historic Environment Desk-Based Assessment</i> (revised edition, October 2020).
Department for Levelling Up, Housing and Communities (DLUHC), <i>National Planning Policy Framework (NPPF)</i> (London, July 2021).
Department for Levelling Up, Housing and Communities (DLUHC), <i>Planning Practice Guidance (PPG)</i> (revised July 2019).
English Heritage, <i>Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment</i> (London, April 2008).
Historic England, <i>Conservation Area Appraisal, Designation and Management, Historic England Advice Note 1</i> (2 nd edition, Swindon, February 2019).

Historic England, *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2* (2nd edition, Swindon, July 2015).

Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12* (Swindon, October 2019).

Historic England, *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd edition, Swindon, December 2017).

Court and Appeal Decisions

Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EWCA Civ 137.

Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin).

Catesby Estates Ltd. V. Steer [2018] EWCA Civ 1697.

Jones v Mordue [2015] EWCA Civ 1243.

Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor [2020] EWHC 2292 (Admin).

Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061.

R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).



Appendix 1: Gazetteer

Heritage Data

HER Event Data

Ev UID	Name	Event Type
68803	A geophysical survey was undertaken by Phase Site Investigations between 17th March and 9th April to the south and east of Tewkesbury.	Geophysical Survey
81962	Geophysical survey of a proposed solar array site at Starveall Farm, Claydon, Ashchurch.	Geophysical Survey
81963	Environmental impact assessment of a proposed solar array at Starveall Farm, Claydon, Ashchurch.	Archaeological report
85941	Desk based assessment of land off the A46, Ashchurch.	Archaeological report
87071	Desk based assessment at Ashchurch MOD base, Tewkesbury	Archaeological report
94471	Desk based assessment on land at Ashchurch.	Archaeological report
94472	Magnetometry survey on land at Ashchurch.	Geophysical Survey
96874	Desk-based assessment for Wormington to Tirley gas pipeline.	Archaeological report
99058	Evaluation of land at Ashchurch, Ashchurch Rural.	Archaeological Evaluation

99269	Evaluation of a proposed solar array site at Starveall Farm, Claydon, Ashchurch undertaken by Oxford Archaeology n 2012.	Archaeological Evaluation
99297	Evaluation of land off the A46, Ashchurch.	Archaeological Evaluation
99893	A desk based assessment undertaken by ARCUS in April 2008 in advance of a pipeline scheme.	Archaeological report
102818	Method Statement for Spoil Deposition and Management within Area of Archaeological Preservation. Land south of the A46, Ashchurch, Tewkesbury.	Archaeological report
102897	Archaeological excavation and watching brief at land south of the A46, Ashchurch, identified finds and features dating from the Mesolithic or early Neolithic period to the 20th century, including Romano-British and Medieval agricultural and in	Archaeological Excavation
106407	VSSP Ashchurch, Tewkesbury. Level 2 Historic Building Record for Skanska Construction Ltd	
111411	Brecon to Tirley High Pressure Gas Pipeline assessment of the potential for analysis.	Geophysical Survey
112685	Geophysical survey for Wormington to Tirley gas pipeline	Geophysical Survey
112686	Watching brief for Wormington to Tirley gas pipeline	Archaeological Watching Brief
112833	Excavations at Pamington and Fiddington along the route of the Gloucester Security of Supply water Pipeline.	Archaeological Excavation

112835	A geophysical survey carried out on land at Ashchurch, Tewkesbury.	Geophysical Survey
112837	Evaluation undertaken in advance of the Gloucester Security of Supply Water Pipeline, Gloucestershire.	Archaeological Evaluation
112839	Magnetometer survey of land off the A46, Ashchurch.	Geophysical Survey
112956	Archaeological survey and excavation along the Cotswold Spring supply trunk main of work carried out 2001 to 2004, Little Buckland to Tewkesbury.	Geophysical Survey
114136	Desk Based Assessment of Ashchurch VSSP, Ashchurch.	Archaeological report

HER Monument Data

Mon UID	Pref Ref	Name	Mon Type	Period
59771	59771	Cropmark	Cropmark	Poss. Prehistoric
59784	59784	Findspot of a Lower Palaeolithic handaxe and flake of Acheulian type made possibly from from Beckford on the Gloucestershire/Worcestershire borders, Ashchurch parish.	Find spot	Lower Paleolithic
104248	104248	Two residual worked flint flakes which dated from either the Mesolithic or Neolithic periods, identified in a Roman ditch during excavation at land south of the A46, Ashchurch.	Excavation finds	Mesolithic/ Neolithic

75157	75157	Mid to late Iron Age settlement from the evaluation undertaken in advance of the Gloucester Security of Supply Water Pipeline, Pamington, Ashchurch.	Excavation finds	Iron Age
82816	82816	Late Iron Age / Romano British settlement located to the south of the A46 in Ashchurch.	Excavation finds	Iron Age / Romano British
54636	54636	Shrunken Village	General	Medieval
65082	65082	A medieval to post medieval settlement site is visible as earthworks at Middle Farm, Pamington, Ashchurch.	General	Medieval
96613	96613	Aston on Carrant Medieval Settlement	General	Medieval
96614	96614	Pamington Medieval Settlement	General	Medieval
95597	95597	Medieval ridge and furrow centered at SO 9524 3299, west of Teddington.	Ridge and Furrow	Medieval
102629	102629	Medieval ridge and furrow centered at SO 9580 3361 to the NW of Teddington.	Ridge and Furrow	Medieval
103125	103125	Area of medieval ridge and furrow adjacent to the Tirlle Brook to the north of Oxenton, Gloucestershire.	Ridge and Furrow	Medieval/ Post Medieval
101757	101757	Medieval and post-medieval ridge and furrow cultivation within the parish of Ashchurch, extending into Northway and Tewkesbury parishes.	Ridge and Furrow	Medieval/ Post Medieval

101777	101777	Area of medieval and post-medieval ridge and furrow lying in the west of the parish of Oxenton, Gloucestershire.	Ridge and Furrow	Medieval/ Post Medieval
56990	56990	Natton Seventh Day Baptist Chapel	General	Post Medieval
57771	57771	Townsend Close Fieldnames	General	Post Medieval
57772	57772	Curborough Fieldnames	General	Post Medieval
59076	59076	Water Tower, Northway	General	Post Medieval
61680	61680	A Wesleyan chapel at Aston Cross. Built in 1845.	General	Post Medieval
104249	104249	Post-medieval sheep dipping pond, identified during excavation of a site south of the A46, Ashchurch, Tewkesbury.	General	Post Medieval
97826	97826	Route of the Tewkesbury turnpike including the great road to London from Tewkesbury.	Turnpike	Post Medieval
101352	101352	Route of the 1789 Cleeve and Evesham Turnpike.	Turnpike	Post Medieval
67877	67877	Part of a World War Two light anti-aircraft battery (VP804 34), is located to the north of Pamington Fields. Ashchurch.	Military	20 th -century
67878	67878	Possible location of a WWII light anti-aircraft battery (VP804 39), Ashchurch.	Military	20 th -century

70577	70577	Northway World War Two Prisoner of War (POW) Camp was a German working camp located to the south of Ashchurch Military depot, Ashchurch.	Military	20 th -century
73307	73307	World War Two military camp associated with Ashchurch military vehicle depot (HER 28444), Ashchurch.	Military	20 th -century
74556	74556	20th century sewage works associated with Ashchurch military vehicle depot and Northway Prisoner of War Camp are located to the south of the A46, Ashchurch.	Military	20 th -century
86410	86410	Ashchurch World War Two military vehicle depot is bounded by the Ashchurch to Evesham railway line to the north and associated military sites to the south and west, Ashchurch.	Military	20 th -century
94715	94715	WWII pillbox (variant), Ashchurch.	Military	20 th -century
104250	104250	Concrete footing of a small rectangular structure, identified during excavation of a site south of the A46, Ashchurch, Tewkesbury.	Military	20 th -century
105229	105229	WWII pillbox (variant), Ashchurch.	Military	20 th -century



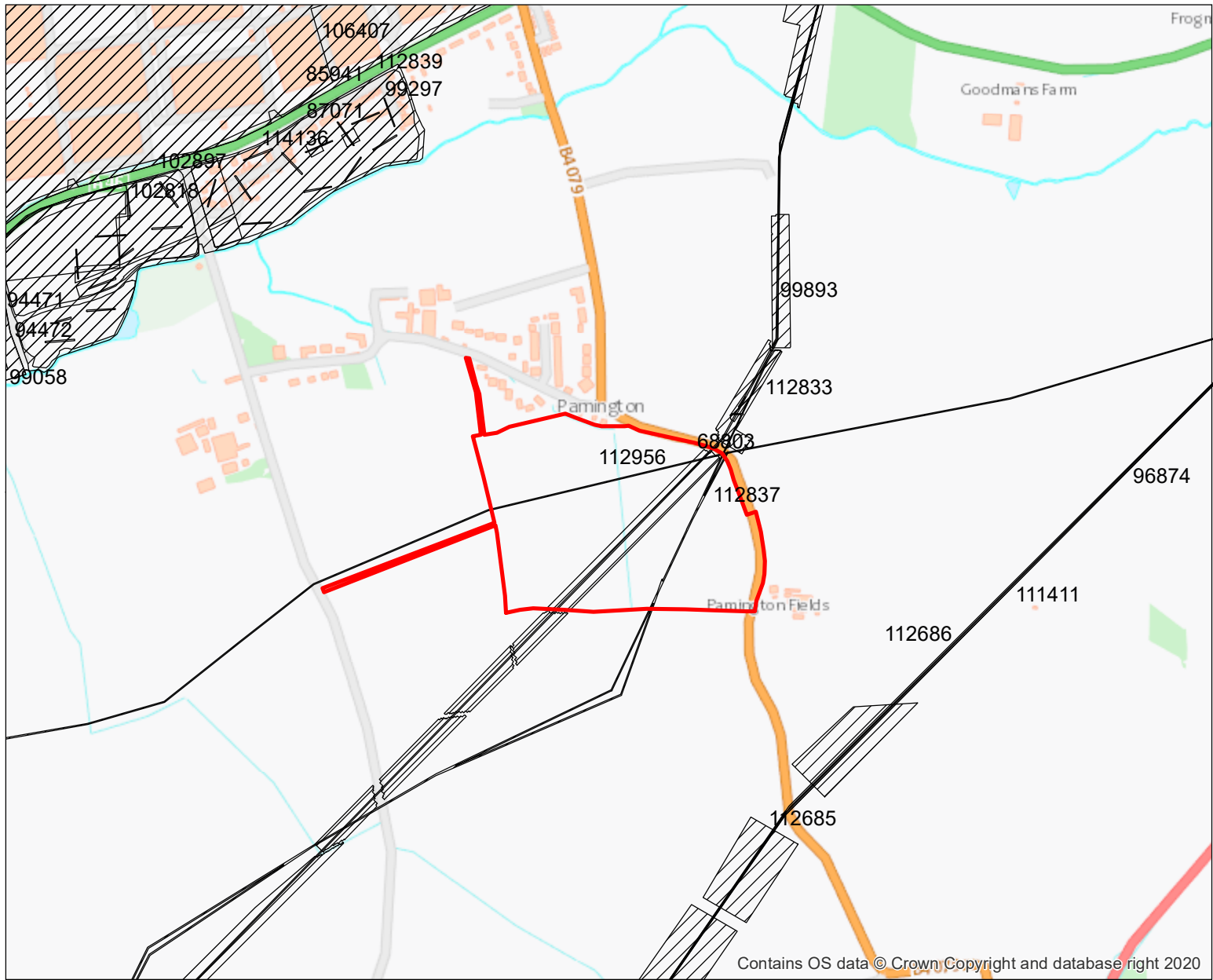
Historic England Data

Historic England Listed Buildings

List Entry	Name	Grade	Eastings	Northings
69238	The Thatched Cottage, Pamington, Ashchurch.	Grade II Listed Building	394289	233049
72874	The Tudor Cottage, Pamington, Tewkesbury.	Grade II Listed Building	394128	233121
76360	Elm Cottage, Pamington.	Grade II Listed Building	394200	233124
77849	The Stirrups, Pamington, Ashchurch.	Grade II Listed Building	394064	233169



Appendix 2: Figures



KEY

- Site
- Events

Revisions:
 First Issue- 08/11/2023
 Second Issue - 22/11/2023

Figure 1: Events
 Pamington, Tewkesbury

Client: Greystoke Land
 DRWG No: **P23-0841_HTS02** Sheet No: - REV: **02**
 Drawn by: JLH Approved by: GS
 Date: 22/11/2023
 Scale: 1:10,000 @ A4





KEY

- Site
- Listed Buildings

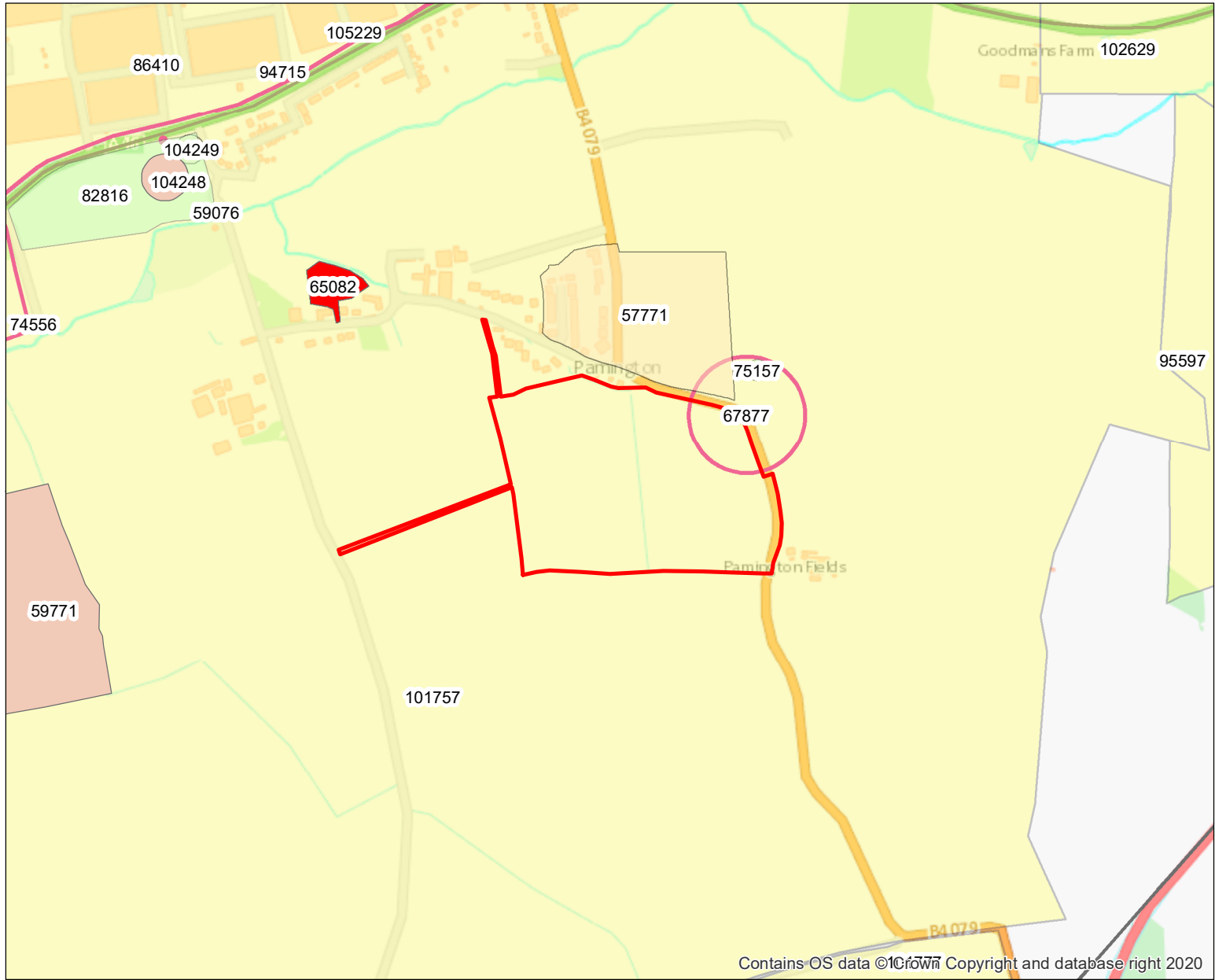
Revisions:
 First Issue- 08/11/2023
 Second Issue - 22/11/2023

Figure 2: Designated Assets
 Pamington, Tewkesbury

Client: Greystoke Land
 DRWG No: **P23-0841_HTS_02** Sheet No: - REV: 2
 Drawn by: JLH Approved by: GS
 Date: 22/11/2023
 Scale: 1:10,000 @ A4



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KEY

- Site
- Prehistoric
- Iron Age/ Roman
- Medieval
- Post Medieval
- Ridge and Furrow
- Turnpikes
- 20th century

Revisions:
 First Issue- 08/11/2023
 Second Issue - 22/11/2023

Figure 3:
Non-designated assets
 Pamington, Tewkesbury

Client: Greystoke Land
 DRWG No: P23-0841_HTS0021 No: - REV: 2
 Drawn by: JLH Approved by: GS
 Date: 22/11/2023
 Scale: 1:10,000 @ A4



Appendix 3: Assessment Methodology

Assessment of significance

In the *NPPF*, heritage significance is defined as:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”²⁴

Historic England's *GPA:2* gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.²⁵

In order to do this, *GPA 2* also advocates considering the four types of heritage value an asset may hold, as identified in English Heritage's *Conservation Principles*.²⁶ These essentially cover the heritage 'interests' given in the glossaries of the *NPPF* and the *PPG* which are archaeological, architectural and artistic, and historic.²⁷

The *PPG* provides further information on the interests it identifies:

- ***Archaeological interest:*** *As defined in the Glossary to the National Planning Policy Framework, there will*

be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

- ***Architectural and artistic interest:*** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.
- ***Historic interest:*** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.²⁸

Significance results from a combination of any, some, or all of the interests described above.

²⁴ DLUHC, *NPPF*, pp. 71–72.

²⁵ Historic England, *GPA:2*.

²⁶ Historic England, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008). These heritage values

are identified as being 'aesthetic', 'communal', 'historical' and 'evidential', see *idem* pp. 28–32.

²⁷ DLUHC, *NPPF*, p. 71; DLUHC, *PPG, Annex 2*.

²⁸ DLUHC, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

The most-recently issued Historic England guidance on assessing heritage significance, *HEAN:12*, advises using the terminology of the *NPPF* and *PPG*, and thus it is that terminology which is used in this Report.²⁹

Listed Buildings and Conservation Areas are generally designated for their special architectural and historic interest. Scheduling is predominantly, although not exclusively, associated with archaeological interest.

Setting and significance

As defined in the *NPPF*:

***“Significance derives not only from a heritage asset’s physical presence, but also from its setting.”*³⁰**

Setting is defined as:

***“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”*³¹**

Therefore, setting can contribute to, affect an appreciation of significance, or be neutral with regards to heritage values.

Assessing change through alteration to setting

How setting might contribute to these values has been assessed within this Report with reference to *GPA:3*, particularly the checklist given on page 11. This advocates the clear articulation of “*what matters and why*”.³²

In *GPA:3*, a stepped approach is recommended, of which Step 1 is to identify which heritage assets and their settings are affected. Step 2 is to assess whether, how and to what degree settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. The guidance includes a (non-exhaustive) checklist of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, green space, functional relationships and degree of change over time. It also lists aspects associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquillity, sense of enclosure, accessibility, rarity and land use.

Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to explore ways to maximise enhancement and minimise harm. Step 5 is to make and document the decision and monitor outcomes.

A Court of Appeal judgement has confirmed that whilst issues of visibility are important when assessing setting, visibility does not necessarily confer a contribution to significance and factors other than visibility should also be considered, with Lindblom LJ stating at

²⁹ Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12* (Swindon, October 2019).

³⁰ DLUHC, *NPPF*, p. 72.

³¹ DLUHC, *NPPF*, p. 71.

³² Historic England, *GPA:3*, pp. 8, 11.

paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement):

Paragraph 25 – “But – again in the particular context of visual effects – I said that if “a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one’s experience of the listed building in its surrounding landscape or townscape” (paragraph 56)”.

Paragraph 26 – “This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building’s setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations, as in Williams (see also, for example, the first instance judgment in R. (on the application of Miller) v North Yorkshire County Council [2009] EWHC 2172 (Admin), at paragraph 89). But it is clear from the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a-013-20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical. These other considerations may include, for example, “the historic relationship between places”. Historic England’s advice in GPA3 was broadly to the same effect.”³³

³³ Catesby Estates Ltd. V. Steer [2018] EWCA Civ 1697, paras. 25 and 26.

³⁴ DLUHC, *NPPF*, para. 200 and fn. 68.

Levels of significance

Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

In accordance with the levels of significance articulated in the *NPPF* and the *PPG*, three levels of significance are identified:

- **Designated heritage assets of the highest significance**, as identified in paragraph 200 of the *NPPF*, comprising Grade I and II* Listed buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 68 of the *NPPF*;³⁴
- **Designated heritage assets of less than the highest significance**, as identified in paragraph 200 of the *NPPF*, comprising Grade II Listed buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas);³⁵ and

³⁵ DLUHC, *NPPF*, para. 200.

- **Non-designated heritage assets.** Non-designated heritage assets are defined within the PPG as *“buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets”*.³⁶

Additionally, it is of course possible that sites, buildings or areas have no heritage significance.

Assessment of harm

Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against, such as whether a proposed development preserves or enhances the character or appearance of a Conservation Area, and articulating the scale of any harm in order to inform a balanced judgement/weighting exercise as required by the NPPF.

In accordance with key policy, the following levels of harm may potentially be identified for designated heritage assets:

- **Substantial harm or total loss.** It has been clarified in a High Court Judgement of 2013 that this would be harm that would *“have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced”*;³⁷ and

- **Less than substantial harm.** Harm of a lesser level than that defined above.

With regards to these two categories, the PPG states:

“Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.”³⁸

Hence, for example, harm that is less than substantial would be further described with reference to where it lies on that spectrum or scale of harm, for example low end, middle, and upper end of the less than substantial harm spectrum/scale.

With regards to non-designated heritage assets, there is no basis in policy for describing harm to them as substantial or less than substantial, rather the NPPF requires that the scale of any harm or loss is articulated whilst having regard to the significance of the asset. Harm to such assets is therefore articulated as a level of harm to their overall significance, using descriptors such as minor, moderate and major harm.

It is also possible that development proposals will cause no harm or preserve the significance of heritage assets. Here, a High Court Judgement of 2014 is relevant. This concluded that with regard to preserving the setting of a Listed building or preserving the character and appearance of a Conservation Area, *“preserving”* means doing *“no harm”*.³⁹

³⁶ DLUHC, PPG, paragraph 039, reference ID: 18a-039-20190723.

³⁷ Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin), para. 25.

³⁸ DLUHC, PPG, paragraph 018, reference ID: 18a-018-20190723.

³⁹ R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).

Preservation does not mean no change, it specifically means no harm. *GPA:2* states that “*Change to heritage assets is inevitable but it is only harmful when significance is damaged*”.⁴⁰ Thus, change is accepted in Historic England’s guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

As part of this, setting may be a key consideration. When evaluating any harm to significance through changes to setting, this Report follows the methodology given in *GPA:3*, described above. Fundamental to this methodology is a consideration of “*what matters and why*”.⁴¹ Of particular relevance is the checklist given on page 13 of *GPA:3*.⁴²

It should be noted that this key document also states:

“Setting is not itself a heritage asset, nor a heritage designation...”⁴³

Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage interests that contribute to this significance, through changes to setting.

With regards to changes in setting, *GPA:3* states that:

“Conserving or enhancing heritage assets by taking their settings into account need not prevent change”.⁴⁴

⁴⁰ Historic England, *GPA:2*, p. 9.

⁴¹ Historic England, *GPA:3*, p. 8.

⁴² Historic England, *GPA:3*, p. 13.

⁴³ Historic England, *GPA:3*, p. 4.

⁴⁴ Historic England, *GPA 3*, p. 8.

Additionally, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor, would necessarily require Planning Permission to be refused. This point has been clarified in the Court of Appeal.⁴⁵

Benefits

Proposed development may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage interests, and hence the significance, of the assets concerned.

As detailed further in **Appendix 5**, the *NPPF* (at Paragraphs 201 and 202) requires harm to a designated heritage asset to be weighed against the public benefits of the development proposals.⁴⁶

Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 201 to 203.⁴⁷

The *PPG* provides further clarity on what is meant by the term ‘public benefit’, including how these may be derived from enhancement to the historic environment (‘heritage benefits’), as follows:

“Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8).

⁴⁵ *Palmer v Herefordshire Council & Anor* [2016] EWCA Civ 1061.

⁴⁶ *DLUHC, NPPF*, paras. 201 and 202.

⁴⁷ *Including – Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor* [2020] EWHC 2292 (Admin); *DLUHC, NPPF*, paras. 201 and 203.



Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- ***sustaining or enhancing the significance of a heritage asset and the contribution of its setting***
- ***reducing or removing risks to a heritage asset***
- ***securing the optimum viable use of a heritage asset in support of its long term conservation.***⁴⁸

Any "heritage benefits" arising from the proposed development, in line with the narrative above, will be clearly articulated in order for them to be taken into account by the decision maker.

⁴⁸ MHCLG, PPG, paragraph 020, reference ID: 18a-020-20190723.

Appendix 4: Legislative Framework

Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and Conservation Areas.⁴⁹ It does not provide statutory protection for non-designated or Locally Listed heritage assets.

Section 66(1) of the Act states that:

“In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”⁵⁰

In the 2014 Court of Appeal judgement in relation to the Barnwell Manor case, Sullivan LJ held that:

“Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight”

⁴⁹ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

⁵⁰ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990, Section 66(1).

when the decision-maker carries out the balancing exercise.”⁵¹

A judgement in the Court of Appeal (‘Mordue’) has clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134 of the 2012 version of the NPPF, the requirements of which are now given in paragraph 202 of the current, revised NPPF, see **Appendix 5**), this is in keeping with the requirements of the 1990 Act.⁵²

In addition to the statutory obligations set out within the *Planning (Listed Buildings and Conservations Area) Act 1990*, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.⁵³

⁵¹ Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EWCA Civ 137. para. 24.

⁵² Jones v Mordue [2015] EWCA Civ 1243.

⁵³ UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

Appendix 5: National Policy Guidance

The National Planning Policy Framework (July 2021)

National policy and guidance is set out in the Government’s *National Planning Policy Framework (NPPF)* published in July 2021. This replaced and updated the previous *NPPF* 2019. The *NPPF* needs to be read as a whole and is intended to promote the concept of delivering sustainable development.

The *NPPF* sets out the Government’s economic, environmental and social planning policies for England. Taken together, these policies articulate the Government’s vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The *NPPF* continues to recognise that the planning system is plan-led and that therefore Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application, including those which relate to the historic environment.

The overarching policy change applicable to the proposed development is the presumption in favour of sustainable development. This presumption in favour of sustainable development (the ‘presumption’) sets out the tone of the Government’s overall stance and operates with and through the other policies of the *NPPF*. Its purpose is to send a strong signal to all those involved in the planning process about the need to plan positively for appropriate new development; so that both plan-making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than barriers. Conserving historic assets in a manner appropriate to their significance forms part of this drive towards sustainable development.

The purpose of the planning system is to contribute to the achievement of sustainable development and the *NPPF* sets out three ‘objectives’ to facilitate sustainable development: an economic objective, a social objective, and an environmental objective. The presumption is key to delivering these objectives, by creating a positive pro-development framework which is underpinned by the wider economic, environmental and social provisions of the *NPPF*. The presumption is set out in full at paragraph 11 of the *NPPF* and reads as follows:

“Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- a. all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;***
- b. strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:***
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting***

the overall scale, type or distribution of development in the plan area; or

- ii. ***any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.***

For decision-taking this means:

- a. ***approving development proposals that accord with an up-to-date development plan without delay; or***
- b. ***where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:***
 - i. ***the application policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or***
 - ii. ***any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.***⁵⁴

However, it is important to note that footnote 7 of the NPPF applies in relation to the final bullet of paragraph 11. This provides a context for paragraph 11 and reads as follows:

“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 180) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.”⁵⁵ (our emphasis)

The NPPF continues to recognise that the planning system is planned and that therefore, Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application.

Heritage Assets are defined in the NPPF as:

“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).”⁵⁶

⁵⁴ DLUHC, NPPF, para. 11.

⁵⁵ DLUHC, NPPF, para. 11, fn. 7.

⁵⁶ DLUHC, NPPF, p. 67.

The NPPF goes on to define a Designated Heritage Asset as a:

“World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation.”⁵⁷

As set out above, significance is also defined as:

“The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”⁵⁸

Section 16 of the NPPF relates to ‘Conserving and enhancing the historic environment’ and states at paragraph 195 that:

“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.”⁵⁹

Paragraph 197 goes on to state that:

“In determining planning applications, local planning authorities should take account of:

- a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;***
- b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and***
- c. the desirability of new development making a positive contribution to local character and distinctiveness.”⁶⁰***

With regard to the impact of proposals on the significance of a heritage asset, paragraphs 199 and 200 are relevant and read as follows:

“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

⁵⁷ DLUHC, NPPF, p. 66.

⁵⁸ DLUHC, NPPF, pp. 71-72.

⁵⁹ DLUHC, NPPF, para. 195.

⁶⁰ DLUHC, NPPF, para. 197.

substantial harm, total loss or less than substantial harm to its significance.”⁶¹

“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.”⁶²**

Section b) of paragraph 200, which describes assets of the highest significance, also includes footnote 68 of the NPPF, which states that 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.

In the context of the above, it should be noted that paragraph 201 reads as follows:

“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.”⁶³**

Paragraph 202 goes on to state:

“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.”⁶⁴

The NPPF also provides specific guidance in relation to development within Conservation Areas, stating at paragraph 206 that:

⁶¹ DLUHC, NPPF, para. 199.

⁶² DLUHC, NPPF, para. 200.

⁶³ DLUHC, NPPF, para. 201.

⁶⁴ DLUHC, NPPF, para. 202.

“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. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”⁶⁵

Paragraph 207 goes on to recognise that “not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance” and with regard to the potential harm from a proposed development states:

“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 200 or less than substantial harm under paragraph 201, 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.”⁶⁶ (our emphasis)

With regards to non-designated heritage assets, paragraph 203 of NPPF states that:

“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.”⁶⁷

Overall, the NPPF confirms that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent it. Local Planning Authorities should approach development management decisions positively, looking for solutions rather than problems so that applications can be approved wherever it is practical to do so. Additionally, securing the optimum viable use of sites and achieving public benefits are also key material considerations for application proposals.

National Planning Practice Guidance

The then Department for Communities and Local Government (now the Department for Levelling Up, Housing and Communities (DLUHC)) launched the planning practice guidance web-based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled.

This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of planning practice guidance documents to be read alongside the NPPF.

The PPG has a discrete section on the subject of the Historic Environment, which confirms that the consideration of ‘significance’ in decision taking is important and states:

⁶⁵ DLUHC, NPPF, para 206.

⁶⁶ DLUHC, NPPF, para. 207.

⁶⁷ DLUHC, NPPF, para. 203.

“Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.”⁶⁸

In terms of assessment of substantial harm, the PPG confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

“In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which

harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.”⁶⁹ (our emphasis)

National Design Guide:

Section C2 relates to valuing heritage, local history and culture and states:

“When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape.”⁷⁰

“Sensitive re-use or adaptation adds to the richness and variety of a scheme and to its diversity of activities and users. It helps to integrate heritage into proposals in an environmentally sustainable way.”⁷¹

It goes on to state that:

“Well-designed places and buildings are influenced positively by:

- ***the history and heritage of the site, its surroundings and the wider area, including cultural influences;***

⁶⁸ DLUHC, PPG, paragraph 007, reference ID: 18a-007-20190723.

⁶⁹ DLUHC, PPG, paragraph 018, reference ID: 18a-018-20190723.

⁷⁰ DLUHC, NDG, para. 46.

⁷¹ DLUHC, NDG, para. 47.



- *the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;*
- *the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details – see Identity.*

Today's new developments extend the history of the context. The best of them will become valued as tomorrow's heritage, representing the architecture and placemaking of the early 21st century.⁷²

⁷² DLUHC, NDG, paras. 48–49.

Appendix 6: Relevant Development Plan Policies

Applications for Planning Permission and Listed Building Consent where relevant, within Ashchurch are currently considered against the policy and guidance set out within the Tewkesbury Borough plan which was adopted on 8th June 2022 and the Joint Core Strategy 2011-31.

The Tewkesbury Borough Plan contains the following relevant policy:

Policy HER2 Listed Buildings

Alterations, extensions or changes of use to Listed Buildings, or development within their setting, will be expected to have no adverse impact on those elements which contribute to their special architectural or historic interest, including their settings.

Any proposals which adversely affect such elements or result in the significant loss of historic fabric will not be permitted.

Any alterations, extensions or repairs to the Listed Buildings should normally be carried out using the traditional materials and building techniques of the existing building.

The Joint Core Strategy contains the following relevant policy:

Policy SD8: Historic Environment

1. The built, natural and cultural heritage of Gloucester City, Cheltenham town, Tewkesbury town, smaller historic settlements and the wider countryside will

continue to be valued and promoted for their important contribution to local identity, quality of life and the economy;

2. Development should make a positive contribution to local character and distinctiveness, having regard to valued and distinctive elements of the historic environment;

3. Designated and undesignated heritage assets and their settings will be conserved and enhanced as appropriate to their significance, and for their important contribution to local character, distinctiveness and sense of place. Consideration will also be given to the contribution made by heritage assets to supporting sustainable communities and the local economy. Development should aim to sustain and enhance the significance of heritage assets and put them to viable uses consistent with their conservation whilst improving accessibility where appropriate;

4. Proposals that will secure the future conservation and maintenance of heritage assets and their settings that are at risk through neglect, decay or other threats will be encouraged. Proposals that will bring vacant or derelict heritage assets back into appropriate use will also be encouraged;

5. Development proposals at Strategic Allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision)



demonstrating that the potential impacts on heritage assets and appropriate mitigation measures have been addressed.

Planning (Listed Buildings and Conservation Areas) Act 1990
Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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