

Stoke Lodge Playing Fields  
Shirehampton Road  
West Dene  
Bristol BS9 2BH

Proposed Installation  
of 8no. CCTV Cameras

Heritage Statement

Project Ref. AH2326

October 2025



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Shirehampton Road  
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## Heritage Statement

Project Ref: AH2326

|             |                       |
|-------------|-----------------------|
| Prepared by | Rob Armour Chelu      |
| Date        | 15 October 2025       |
| Issue no.   | 01.1                  |
| Approved    | Sue Farr (15/10/2025) |

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## 1. SUMMARY

|                      |                                            |
|----------------------|--------------------------------------------|
| <b>Project Name:</b> | Stoke Lodge Playing Fields                 |
| <b>Proposal:</b>     | Proposed Installation of 8no. CCTV Cameras |
| <b>Location:</b>     | West Dene, Bristol BS9 2BH                 |
| <b>NGR:</b>          | 355934, 176538                             |
| <b>Type:</b>         | Heritage Statement                         |

This heritage statement has been completed in respect of a proposal for the installation of 8no. CCTV cameras on the boundary of Stoke Lodge Playing Fields, Bristol, centred on NGR 355934, 176538. The playing field is open to the public but also in use by Cotham School on a regular basis.

This assessment has considered the heritage significance of Stoke Lodge (Grade II Listed Building; List Entry 1202564) and the potential for the proposed installation of eight mounted CCTV cameras within Stoke Lodge Playing Field to result in harm to its significance.

Desk-based research and on-site analysis have confirmed that the Playing Field does not meet the criteria for designation as a non-designated heritage asset (NDHA). Its origins as a post-war recreational ground, largely without historic or architectural association with Stoke Lodge, mean that it makes only a limited and largely neutral contribution to the setting of the Listed Building.

The significance of Stoke Lodge derives primarily from its historic and architectural interest as an early Victorian suburban villa of Tudor Revival style, together with the contribution made by its mature landscaped grounds. The appreciation of the Listed Building's historic villa character is focused on its immediate gardens and approach drive and is visually and physically separated from the Playing Field by substantial tree cover.

A site visit has established that none of the proposed CCTV camera locations has a direct visual or spatial relationship with Stoke Lodge, and that views between the Listed Building and the Playing Field are effectively screened by mature planting. Consequently, the proposed development will not erode the legibility of the historic villa setting or diminish the building's architectural or historical significance. The proposals are of a modest and utilitarian character, appropriate to their function and unobtrusive within the open landscape of the Playing Field. They do not intrude into the designed grounds of Stoke Lodge nor into any significant view to or from the Listed Building. While the proposals introduce contemporary security infrastructure, this will not constitute harm to the heritage significance of Stoke Lodge. On the contrary, the enhanced security provision offers indirect benefits to the protection and continued use of the Playing Field and the associated educational facilities, thereby supporting the ongoing positive management of the wider site.

It is concluded that the proposed development will result in no harm to the setting or significance of Stoke Lodge. The proposals are compatible with the statutory duties of Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and align with the heritage protection objectives of the National Planning Policy Framework (NPPF), which seek to conserve and enhance the historic environment.

## 2. OUTLINE

- 2.1. This heritage statement has been completed in respect of a proposal for the installation of 8no. CCTV cameras on the boundary of Stoke Lodge Playing Fields, Bristol, centred on NGR 355934, 176538. The wider blue line boundary is referred to hereafter as ‘the Playing Field’, with the Application Site boundary and camera locations shown in red (Image 1). The playing fields are open to the public but also in use by Cotham School on a regular basis.

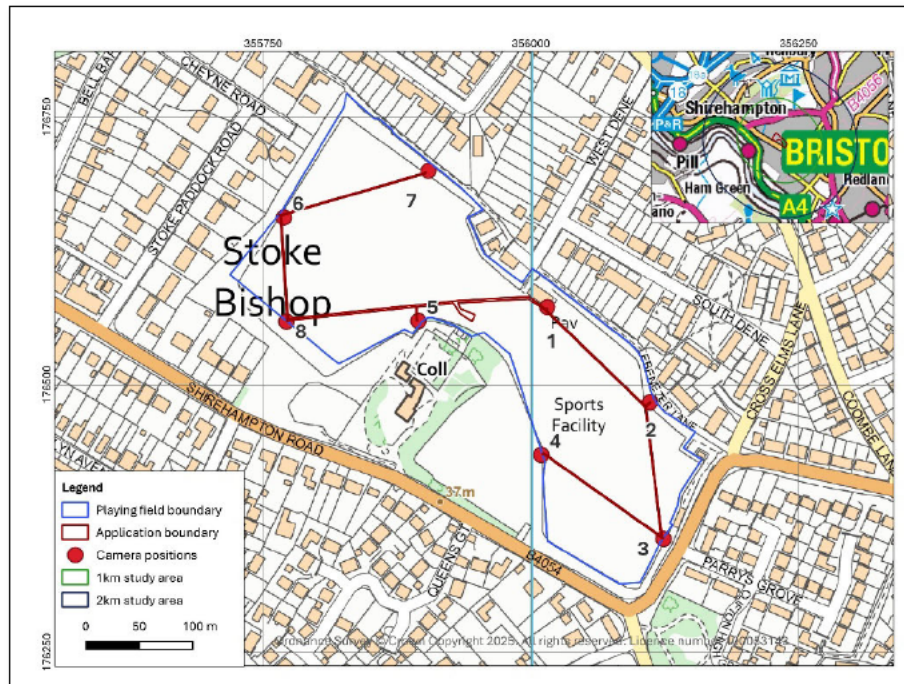


Image 1: Location plan showing proposed CCTV camera positions



Image 2: Aerial view of Site showing nearby Listed Buildings

- 2.2. The Playing Field lies to the north of Shirehampton Road and south of West Dene, Bristol. No building or feature within the Site is nationally or locally designated.

- 2.3. A previous planning application for the installation of a single CCTV camera at the Playing Field was refused on heritage grounds, citing harm to the Grade II Listed Stoke Lodge, which lies c. 40m from the Playing Field.

#### *Limitations of data*

- 2.4. Much of the data used in this assessment consists of secondary information derived from a variety of sources, only some of which have been directly examined for the purposes of this assessment. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.

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#### *Instruction and limitations of this report*

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#### *Assessment Criteria*

- 2.7. The criteria used in this assessment to define the level of harm resulting from any proposed development are set out in Table 1, below.

**Table 1: Definition of harm**

| <b>Magnitude of Impact</b> | <b>Defined as</b>                                                                                                                                            | <b>Harm</b>                |
|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
| Major Adverse              | Total loss or major alteration of the assets or change in its setting, leading to the total loss or major reduction in the significance of the asset         | Substantial Harm           |
| Moderate Adverse           | Partial Loss or alteration of the assets or change in its setting leading to the partial loss or reduction in the significance of the asset                  | Less Than Substantial Harm |
| Minor Adverse              | Slight change from pre-development conditions to the asset or change in its setting leading to the slight loss or reduction in the significance of the asset | Less Than Substantial Harm |
| Negligible                 | No change or very slight change to the asset or change in its setting resulting                                                                              | No Harm                    |

|                     |                                                                                                                    |         |
|---------------------|--------------------------------------------------------------------------------------------------------------------|---------|
|                     | in no change or reduction in the significance of the asset                                                         |         |
| Minor Beneficial    | Slight improvement to the asset or change in its setting which slightly enhances the significance of the asset     | No Harm |
| Moderate Beneficial | Moderate improvement to the asset or change in its setting which moderately enhances the significance of the asset | No Harm |
| Major Beneficial    | Major improvement to the asset or change in its setting which substantially enhances the significance of the asset | No Harm |

### 3. SITE ASSESSMENT

#### *The Site and its setting*

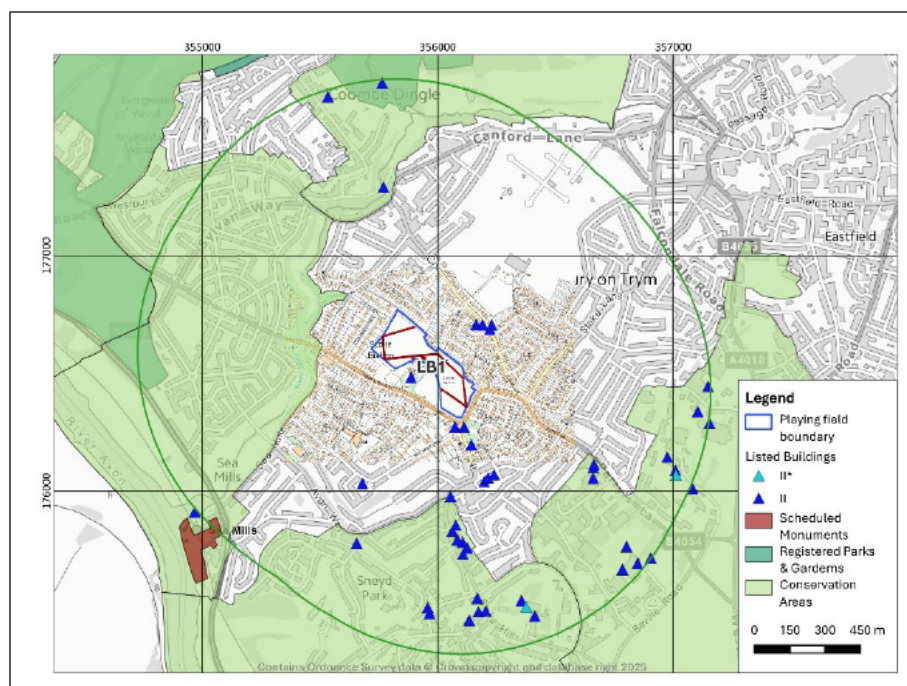


Image 3: Distribution of Designated heritage assets in study area

- 3.1. An arbitrary 1km study area was established to better quantify and understand the distribution and type of designated heritage assets in proximity to the Site.
- 3.2. The study area includes 47 Listed Buildings (Image 3), all but two of which are Grade II Listed. The study area also includes parts of two Registered Parks and Gardens; *Blaise Castle and Hamlet* (Grade II\*) and *Kings Weston House* (Grade II).
- 3.3. Two Scheduled Monuments are also recorded, comprising *Druid Stoke burial chamber*, *Stoke Bishop*, and *Part of the Roman Settlement of Abonae*.

- 3.4. Elements of four Conservation Areas are also present in the study area. These comprise; Kingsweston and Trym Valley, Sea Mills, Sneyd Park and The Downs.
- 3.5. No designated heritage assets or areas are within the Site, which is not situated in any of the four Conservation Areas.

### *Site visit*

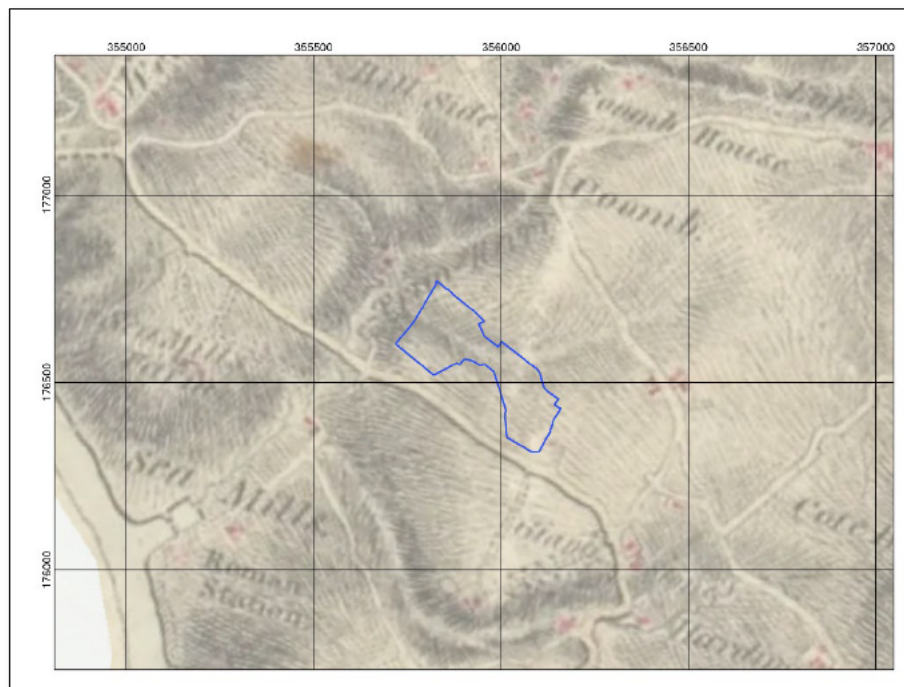
- 3.6. A site visit was undertaken on 16<sup>th</sup> September 2025 where the Playing Field area was walked over and visually assessed. Visual and spatial relationships between each of the 8 proposed CCTV camera positions and the Grade II Listed Stoke Lodge were assessed in terms of the potential for visual impacts, and observations made at the time have informed the findings of this heritage statement. Given the relative dates of the Playing Field and Stoke Lodge, the developmental history of the area is illustrated below in the historic map regression section.

### *Historic map regression*

- 3.7. The study of historic maps can help to identify the evolution of the settings of historic places, and aid in the identification of how they have changed through time. Historic map regression can also identify historic relationships, such as designed views or routeways, which may have become fossilised in the historic landscape, streetscape or possibly lost to development or boundary change.

#### *1816 Edmund Crocker – Chipping Sodbury*

- 3.8. Edmund Crocker's map of 1816 is one of the first tranche of hand drawn Ordnance Survey maps created for the military. It shows the Playing Field site as undeveloped. Shirehampton Road to the south is extant.



*Image 4: 1816 Edmund Crocker – Chipping Sodbury*

### 1841 Westbury and Stoke Bishop parish tithe map

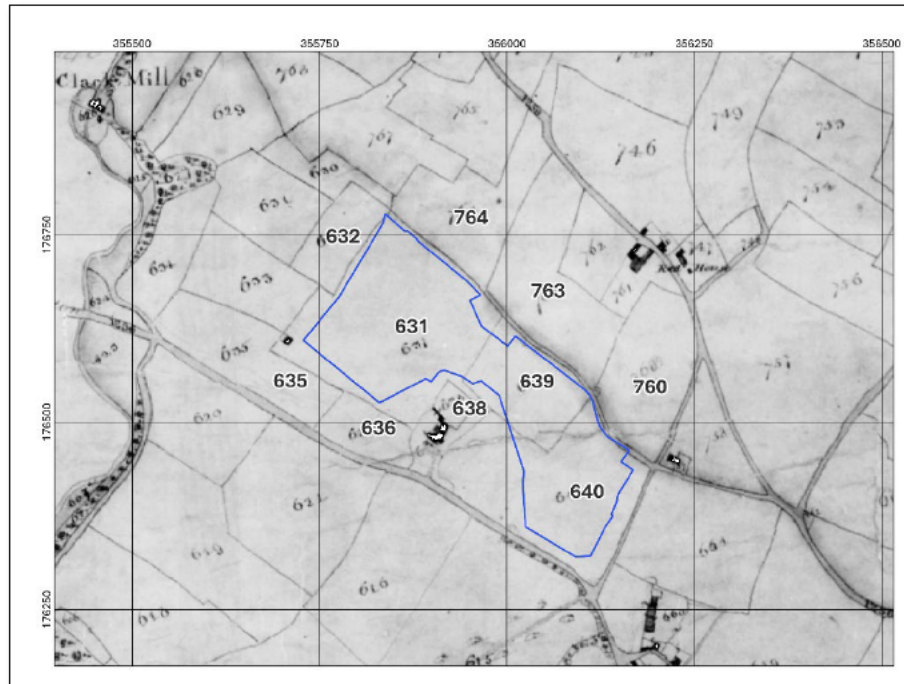


Image 5: 1841 Westbury and Stoke Bishop parish tithe map

- 3.9. The tithe map for Westbury and Stoke Bishop (noted as a ‘tithing in the parish of Westbury upon Trym’) was completed in 1841 by Y. and J.P. Sturge, with the apportionment compiled in 1842 (Kain & Oliver 1995). The Site forms elements of three plots (631, 639 and 640), and these, along with several adjacent and nearby plots, are included in Table 2 below to provide further information on local land use and ownership. Plot/field name interpretation is generally after Cavill 2018 or further research.

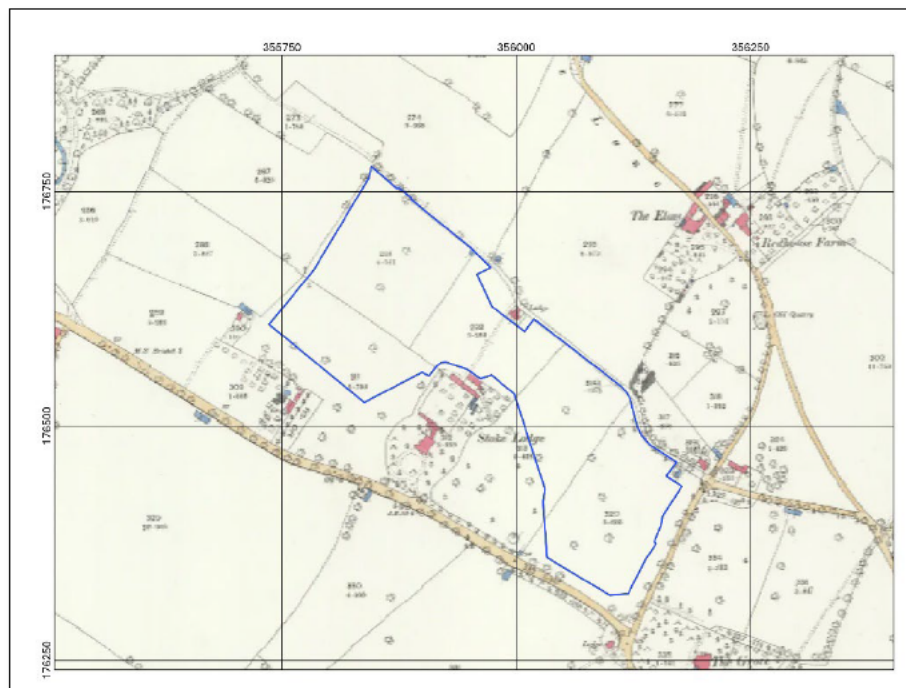
**Table 2: 1842 Westbury and Stoke Bishop tithe map apportionment**

| Plot No. | Plot Name                         | Landowner                         | Land Use | Interpretation                                                                                          |
|----------|-----------------------------------|-----------------------------------|----------|---------------------------------------------------------------------------------------------------------|
| 631      | Paddocks                          | Sarah Fisher                      | Pasture  | Self-explanatory                                                                                        |
| 639      | Browns Field                      | Abraham Gray<br>Harford Battersby | Pasture  | Probably after a family name                                                                            |
| 640      | French Ground                     | Thomas Bowman                     | Pasture  | May allude to the growing of sainfoin – a legume used for forage for sheep, cattle, goats, and horses   |
| 638      | House, Offices, Yard, Gardens &c. | Thomas Bowman                     | -        | Self-explanatory                                                                                        |
| 636      | Paddock                           | Thomas Bowman                     | Arable   | Self-explanatory                                                                                        |
| 635      | Silklands                         | James Ford                        | Pasture  | Possibly relates to Shining wet grassland that looked silky in the light or land covered in spider webs |

|     |               |                                  |         |                                                   |
|-----|---------------|----------------------------------|---------|---------------------------------------------------|
| 632 | Paddocks      | Sarah Fisher                     | Pasture | Self-explanatory                                  |
| 764 | Browns Field  | George Smith                     | Arable  | As 639                                            |
| 763 | Stable Ground | Honorable William Middleton Noel | Arable  | Land adjoining a stable                           |
| 760 | Wallands      | Daniel Collins                   | Arable  | Land adjoining a wall, or containing ruined walls |

- 3.10. The apportionment document records the eastern field of the current Playing Field in the same ownership as Stoke Lodge, the Bristol merchant Thomas Bowman, who was first purchaser and occupant of Stoke Lodge, built in 1836.
- 3.11. The land is undeveloped and the other two parcels which today make up the Playing Field are in separate ownerships.

*1879 Ordnance Survey County Series 1:2,500*



*Image 6: 1879 Ordnance Survey County Series 1:2,500*

- 3.12. The 1879 Ordnance Survey map shows the Playing Field has been further sub-divided since the tithe map was issued. Now forming elements of six fields. Stoke Lodge is named, and outbuildings extend to the northeast. One lies just within the modern Playing Field boundary. A track crosses the area from these outbuildings to a second *Lodge* just northeast of the Playing Field boundary.

*1901 Ordnance Survey County Series 1: 2,500*

- 3.13. By the turn of the 20<sup>th</sup> century, the OS map shows an additional small outbuilding within the Playing Field boundary, adjacent to the earlier building. Walling appears to enclose a small area to the east of these buildings.

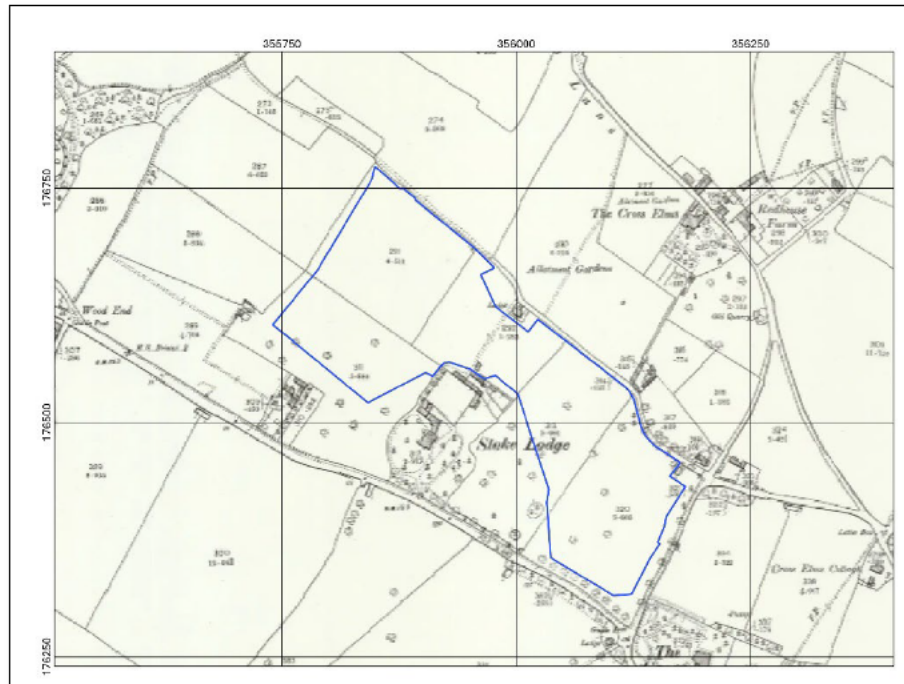


Image 7: 1901 Ordnance Survey County Series 1:2,500

1912 Ordnance Survey County Series 1:2,500

- 3.14. By 1912 there is no significant change within the Playing Field boundary.

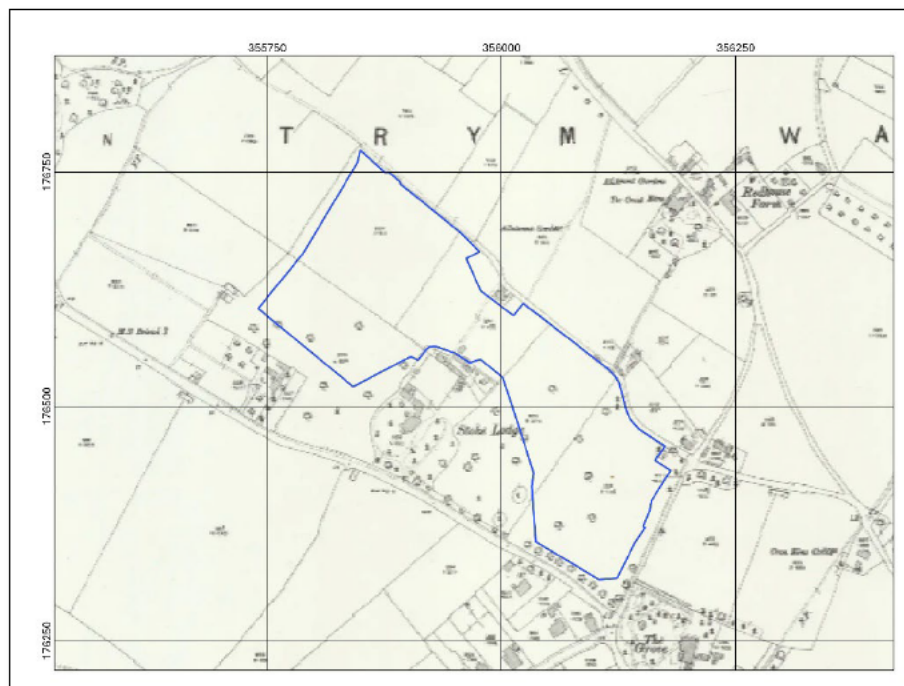


Image 8: 1912 Ordnance Survey County Series 1:2,500

1936 Ordnance Survey County Series 1:2,500

- 3.15. By the mid-1930s the Playing Field site remains undeveloped, although the northwestern field is now in use as a *Cricket Ground*.

- 3.16. Significant largely residential development has encroached from all directions, effectively leaving these fields as an undeveloped 'island' within the residential suburb.

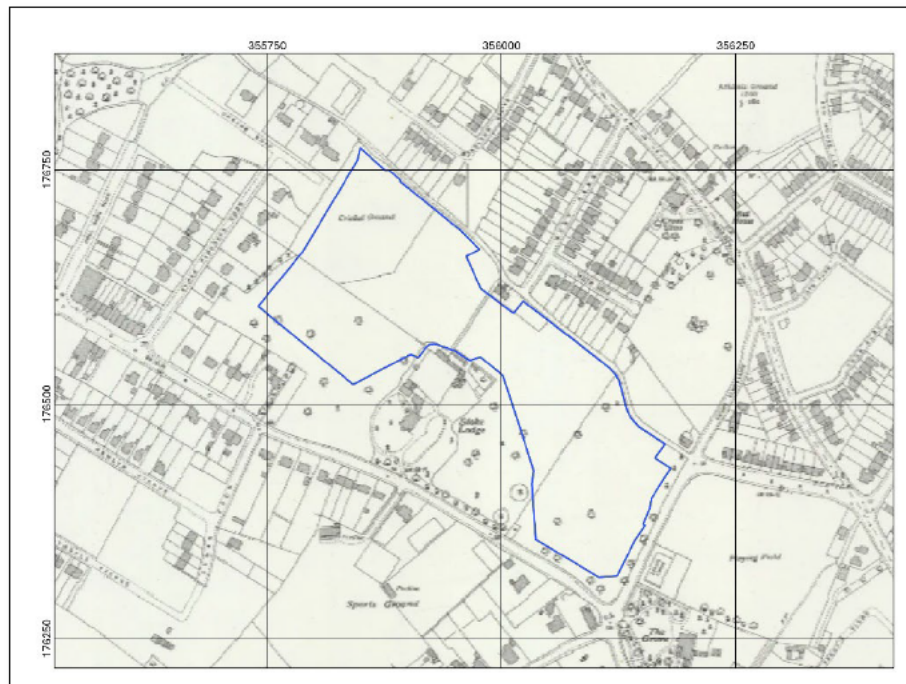


Image 9: 1936 Ordnance Survey County Series 1:2,500

1953-54 Ordnance Survey Plan 1:2,500

- 3.17. By the mid-1950s the *Playing Field* has been established through the amalgamation of the earlier field units, including the Cricket Ground.

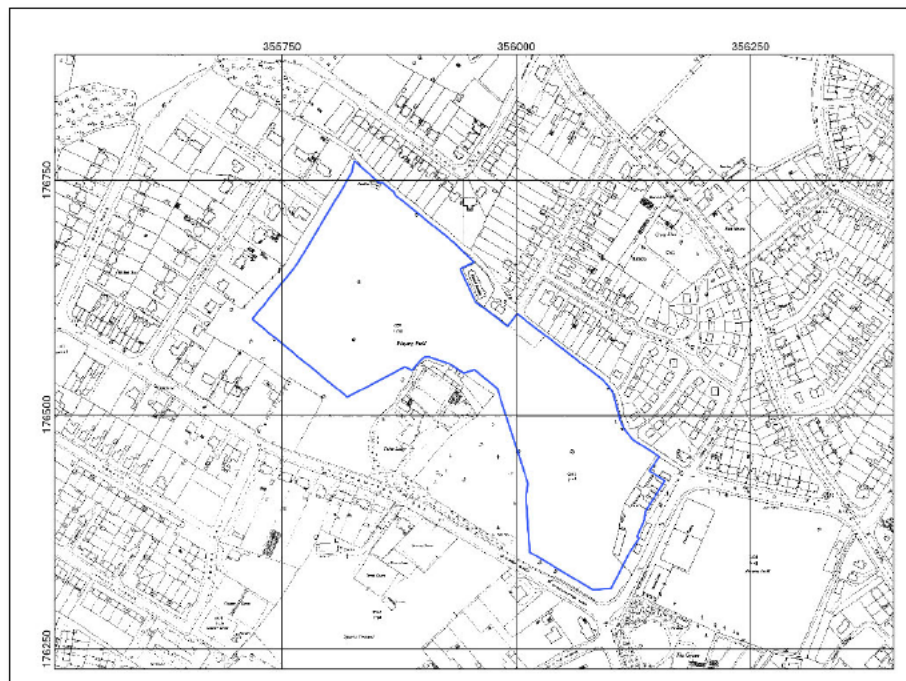


Image 10: 1953-54 Ordnance Survey Plan 1:2,500

- 3.18. A small group of buildings are now situated in the southeast of the Playing Field.

### 1984 Ordnance Survey Plan 1:10,000

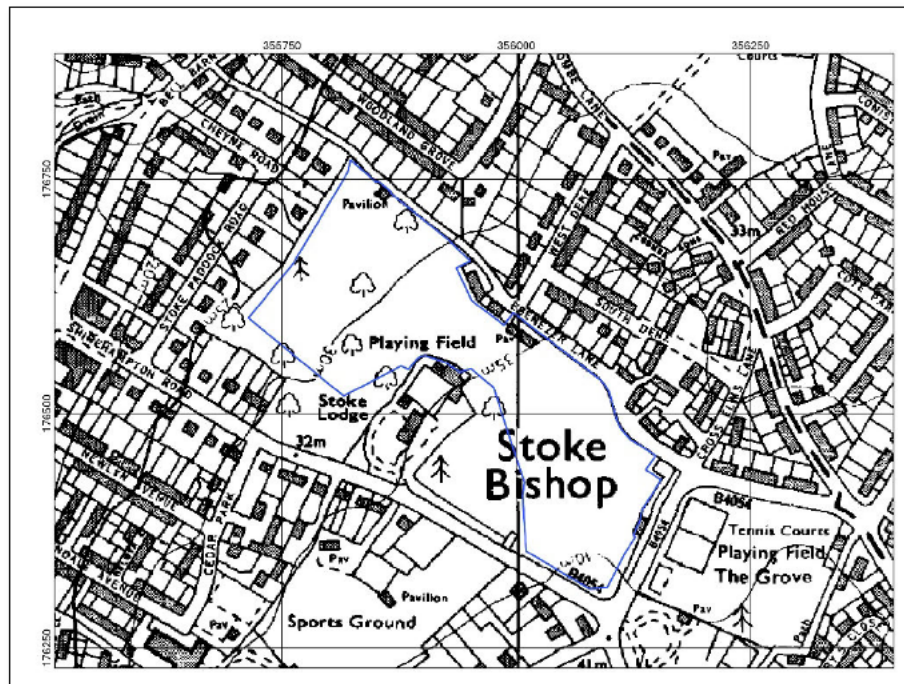


Image 11: 1984 Ordnance Survey Plan 1:10,000

- 3.19. By the 1980s a scattering of trees is illustrated within the Playing Field. Peripheral buildings to the northeast are shown and appear to have been remodelled whilst those to the southeast have been removed. A *Pavillion* has been built toward the northwest corner of the Playing Field. Buildings north of Stoke Lodge remain extant.

### Satellite imagery

- 3.20. The modern Google Earth sequence covers the period 1999 to 2025. The 1999 image shows the building within the northeast boundary has been completed. Buildings north of Stoke Lodge are in a dilapidated and roofless condition.
- 3.21. No significant change is noted throughout the remaining images.

## 4. ASSESSMENT OF SIGNIFICANCE

### Scoping

- 4.1. Initial desk based studies, and the subsequent site visit, identified a single Grade II Listed Building, Stoke Lodge to the southwest of the Playing Field whose setting was considered to be at risk of harm as a result of the proposed development. This setting was cited by the LPA in a previous refusal for a single CCTV camera installation.
- 4.2. In light of comments from the LPA, the veracity of the considerations of the Playing Field as a non-designated heritage asset (NDHA) was explored as part of this assessment.
- 4.3. The Playing Field was formed during the post-war period from a number of separate field units, one of which had been adapted as a Cricket Ground. Historically the majority of the land that makes up the Playing Field was in separate ownership to Stoke Lodge, and no significant historical association between the two entities has been identified.

- 4.4. In essence, the Playing Field is a modern period foundation which includes no heritage assets within its boundaries. It is concluded that the Playing Field meets none of the criteria which would suggest it to be an NDHA, and it has been excluded from further assessment excepting its role as an element of the wider setting of Stoke Lodge.

### *Stoke Lodge (Grade II Listed Building; List Entry 1202564)*

#### *Description*

- 4.5. Stoke Lodge is a substantial two-storey former house of Tudor Revival style, built in 1836 and altered in 1889. Constructed in squared coursed Lias limestone with dressed limestone detailing, the building retains its historic character and much of its 19<sup>th</sup> century architectural detailing. It stands in landscaped grounds and whilst it now serves as a college, part of Bristol City Council's Adult Learning Service, it continues to read as a high-status early Victorian suburban villa (Image 13).



*Image 12: Stoke Lodge, southeast-facing elevation*

#### *Contributors to the significance of the Listed Building*

- 4.6. Archaeological and evidential value: While Stoke Lodge is primarily significant as a standing building, its fabric retains evidence of its 19<sup>th</sup> century construction techniques, materials, and subsequent alteration in 1889. The potential for below-ground remains (e.g. associated service ranges or garden features) adds to its evidential value for understanding suburban villa layouts of this period. The archaeological and evidential value of the building is considered to contribute to its overall significance at a moderate level.
- 4.7. Historical value: Illustrative value is found in the building's demonstration of the suburban expansion and architectural tastes of early Victorian Bristol, when prosperous families favoured more ornate historic styles for country house style villas on the fringes of the growing city.
- 4.8. The building's construction date of 1836, which is recorded on the exterior, is further linked to local building traditions through the use of regional materials such as Lias

limestone and Bristol Delft tiles. Its later adaptation as a college reflects the evolution of large suburban villas to new institutional uses in the late 19<sup>th</sup> and 20<sup>th</sup> centuries.

- 4.9. The historical value of the Listed Building is considered a major contributor to its heritage significance.
- 4.10. Architectural and aesthetic value: The Listed Building's design represents a fine example of the Tudor Revival style, popular among prosperous suburban villa houses in the early 19<sup>th</sup> century. Distinctive features include the front elevation with two projecting shouldered gables flanking a recessed central bay, a single-storey parapeted porch with a Tudor-arched entrance, foliate spandrels and original two-leaf door, stepped gables with turned finials and scrolled date panels inscribed *AD 1836*.
- 4.11. The interior was not accessed in the completion of this heritage statement; however, the List Entry describes notable decorative elements that enrich the building's historic character, including a central hall with polygonal plaster ceiling, a Tudor-arched stone fireplace inset with Bristol Delft tiles, and panelled walls with an open-well staircase including turned balusters and panelled newels. The survival of these features enhances the building's architectural value as a relatively intact example of an early-Victorian Tudor Revival villa.
- 4.12. It is assessed that the property's architectural and aesthetic values represent a major contribution to its significance.
- 4.13. Communal value: As a long standing and prominent building in the local streetscene, and now serving an educational function, Stoke Lodge is well regarded within the community. It contributes to local identity, and its continued use and visibility strengthen communal engagement with the area's historic environment. A minor level of communal value is assessed.
- 4.14. Setting: Stoke Lodge sits within mature landscaped grounds, with large trees, lawns and an approach drive that reinforce its historic character as a 19<sup>th</sup> century villa set in a designed garden landscape. The sense of a country house villa in a parkland setting remains legible despite later adaptations for institutional and educational use. This relationship between house and grounds enhances the appreciation of its architectural form and its intended picturesque quality.
- 4.15. This setting is assessed to represent a major contributor to its overall heritage significance.
- 4.16. Overall: Stoke Lodge is considered a building of special interest, whose significance is derived largely from its historical value and architectural/aesthetic qualities, along with an important contribution from its mature landscaped setting.

## 5. ASSESSMENT OF IMPACT

### *Planning proposal*

- 5.1. The proposed development includes the installation of 8mo. CCTV camera comprising 6M Tilt-Down CCTV columns with mounted panoramic cameras allowing for 180° coverage. Detailed proposal plans are included in Appendix 2 of this heritage statement.

### *Planning matters*

- 5.2. A previous application for the installation of a single CCTV mounted camera at the Playing Field was refused on heritage grounds, namely the setting of the Grade II Listed Stoke Lodge.

### *Setting of Stoke Lodge*

- 5.3. The Site visit considered each of the eight proposed CCTV camera locations in turn, in terms of both their visual and spatial relationship with Stoke Lodge, and the more holistic effect of these modern structures with the wider setting of the Listed Building. The 8 photographs taken from the CCTV positions toward the Listed Building are shown in Images 13-14.
- 5.4. As can be clearly seen from the images, there are no views of Stoke Lodge available from any of the camera sites, and the same is true of views out from Stoke Lodge which are entirely obscured by tree planting north of the Listed Building.
- 5.5. On a more holistic level, the historical relationship between the Playing Field and Stoke Lodge has been explored. Beyond the shared ownership of a single field which is today incorporated into the southeast of the Playing Field, there are no historical associations. The Playing Field in its modern form has never comprised an integral element of the setting to Stoke Lodge, nor indeed are the original fields considered an important element in its historical siting or functionality. The Listed Building was initially a domestic dwelling, set within landscaped grounds. Agricultural fields would not have served to enhance this setting and indeed, the current Playing Field equally does not enhance the setting of the Listed Building to any significant degree. The historic siting of outbuildings, presumably service buildings, to the northeast of the main house indicates that views in this directly were not considered of importance at that time.
- 5.6. A modern association is recognised in the Playing Field's use as a facility for the college based at Stoke Lodge, but this is not considered relevant in heritage terms.
- 5.7. A number of beneficial aspects are recognised in the proposed CCTV coverage of the Playing Field. It was noted during the site visit that the surrounding fencing, currently incomplete and under construction, has already been subject to vandalism with a number of sections damaged.
- 5.8. In addition, the red brick building adjacent to Stoke Lodge (to the northwest), which is presumably covered by the Listing, either directly or as a curtilage listed building, has been subject to vandalism in the form of graffiti to its northwest-facing elevation (Image 15).
- 5.9. The Playing Field also serves as a facility for Cotham School, an independent school catering for students from Year 7 through to Year 13. Additional security is considered an important benefit in terms of the use of the Playing Field by school pupils, particularly given the residential urban nature of the site's surroundings.
- 5.10. These examples of vandalism and the ongoing use of the Playing Field by the students of Cotham School clearly demonstrate a need for additional security. It has been established that the CCTV installation will be of a relatively unobtrusive nature, sited in an area which has not been found to be a significant contributor to the significance of Stoke Lodge.

- 5.11. No capacity for harm to the setting or significance of Stoke Lodge is found, with a number of beneficial aspects identified.



*Image 13: Camera positions 1-4*



*Image 14: Camera positions 5-8*



*Image 15: Graffiti on wall of Listed Building*

## 6. CONCLUSION

- 6.1. This assessment has considered the heritage significance of Stoke Lodge (Grade II Listed Building; List Entry 1202564) and the potential for the proposed installation of eight mounted CCTV cameras within Stoke Lodge Playing Field to result in harm to its significance.
- 6.2. Desk-based research and on-site analysis have confirmed that the Playing Field does not meet the criteria for designation as a non-designated heritage asset (NDHA). Its origins as a post-war recreational ground, largely without historic or architectural association with Stoke Lodge, mean that it makes only a limited and largely neutral contribution to the setting of the Listed Building.
- 6.3. The significance of Stoke Lodge derives primarily from its historic and architectural interest as an early Victorian suburban villa of Tudor Revival style, together with the contribution made by its mature landscaped grounds. The appreciation of the Listed Building's historic villa character is focused on its immediate gardens and approach drive and is visually and physically separated from the Playing Field by substantial tree cover.
- 6.4. A site visit has established that none of the proposed CCTV camera locations has a direct visual or spatial relationship with Stoke Lodge, and that views between the Listed Building and the Playing Field are effectively screened by mature planting. Consequently, the proposed development will not erode the legibility of the historic villa setting or diminish the building's architectural or historical significance.
- 6.5. The proposals are of a modest and utilitarian character, appropriate to their function and unobtrusive within the open landscape of the Playing Field. They do not intrude into the designed grounds of Stoke Lodge nor into any significant view to or from the Listed Building.
- 6.6. While the proposals introduce contemporary security infrastructure, this will not constitute harm to the heritage significance of Stoke Lodge. On the contrary, the

enhanced security provision offers indirect benefits to the protection and continued use of the Playing Field and the associated educational facilities, thereby supporting the ongoing positive management of the wider site.

- 6.7. It is concluded that the proposed development will result in no harm to the setting or significance of Stoke Lodge. The proposals are compatible with the statutory duties of Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and align with the heritage protection objectives of the National Planning Policy Framework (NPPF), which seek to conserve and enhance the historic environment.
- 6.8. This assessment follows national and local planning policy and guidance set out in the 2025 issue of the NPPF, the Bristol Development Framework Core Strategy - Adopted June 2011, and guidance notes issued by Historic England and the ClfA.

## 7. SOURCES AND REFERENCES

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### *Other Sources*

British History Online

Historicengland.org

National Heritage List for England

Oldmapsonline.org

Wiki Commons

## Appendix 1: Proposal plans

LEGEND

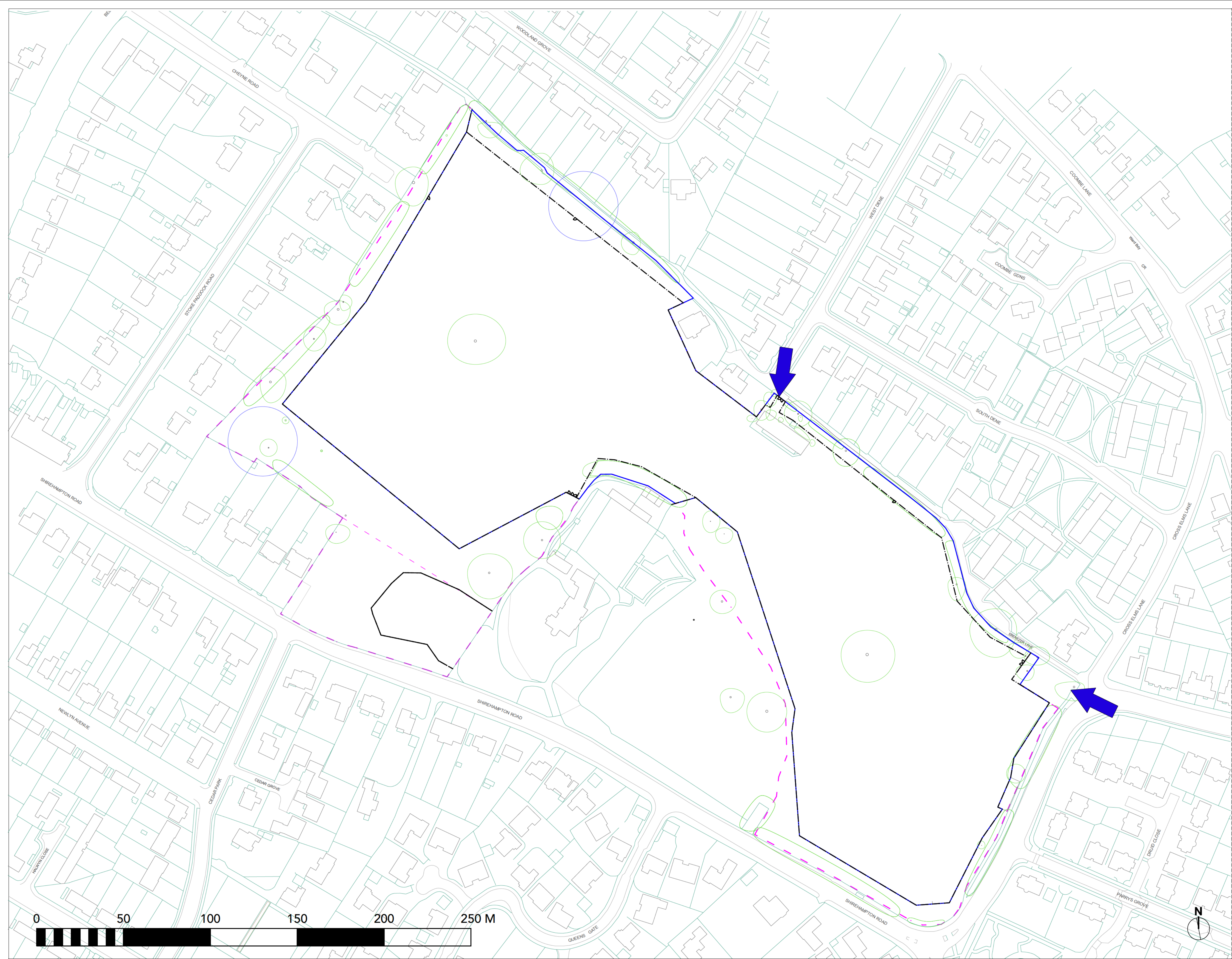
- School Boundary
- Fence line where different from school boundary
- Lease Boundary (approximate)
- Playing Field Main Access Points

Notes

Site based on OS Survey data

Tree positions in and around the site based on tree survey by Bosky Trees.

20m exclusion areas for badger setts shownn in blue.



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For Planning



|              |                         |                   |               |
|--------------|-------------------------|-------------------|---------------|
| Project      | Cotham Fields           | September 2025    | 2025.07       |
| Title        | CCTV Existing Site Plan |                   |               |
| Scale<br>@A1 | 1:1000                  | Drawing<br>number | 2025 CCTV P02 |
|              |                         | Issue:            |               |

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LEGEND

- School Boundary
- CCTV Column and buried base
- CCTV duct line - existing
- CCTV duct line - proposed
- Fence line where different from school boundary
- Lease Boundary (approximate)
- Playing Field Main Access Points
- Proposed new trees

Notes

Site based on OS Survey data

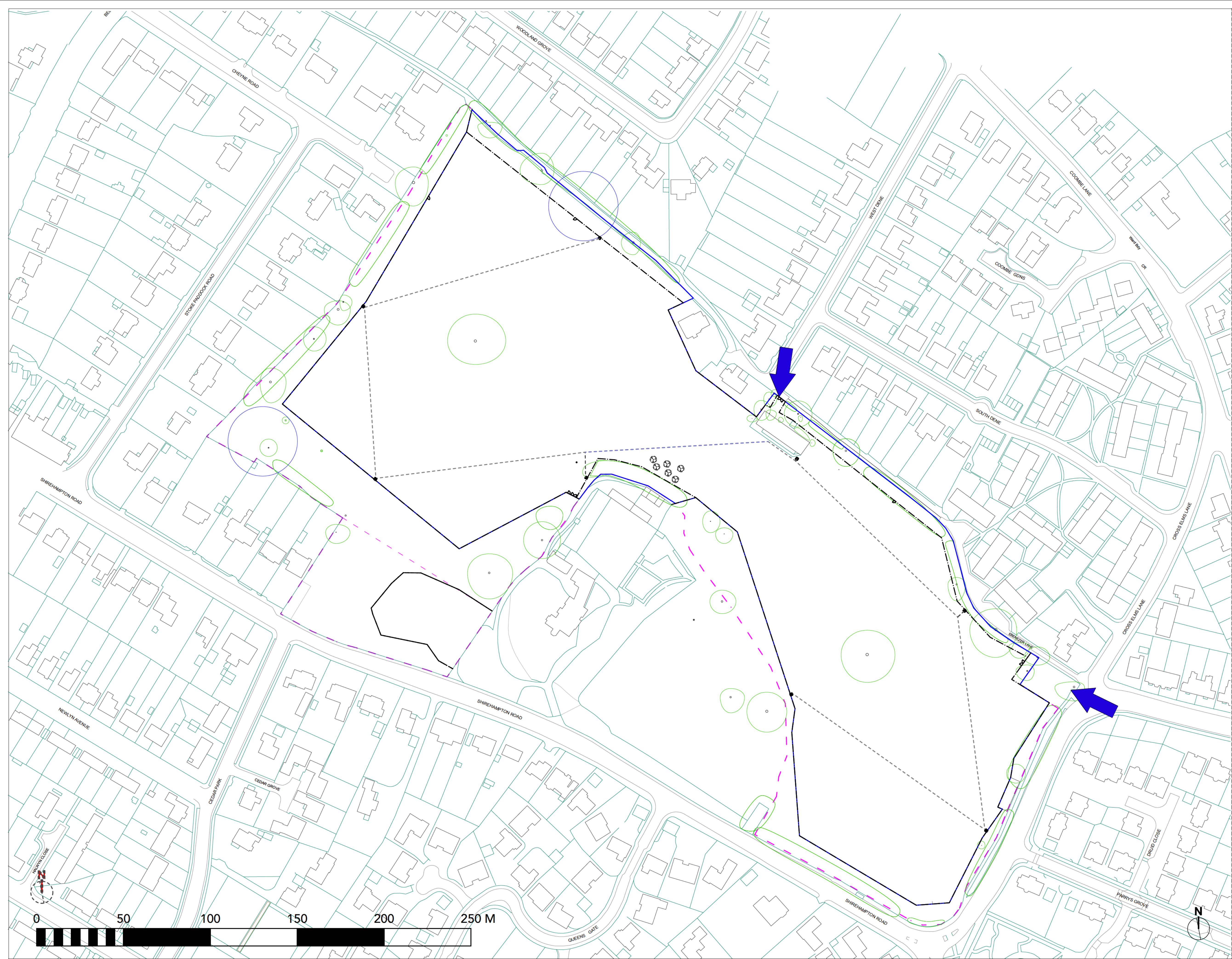
Tree positions in and around the site based on tree survey by Bosky Trees.

20m exclusion area for badger setts shown in blue.

**Six new trees proposed:**

Deciduous species:  
Planted as 16-18, rootballed and clear stemmed to 3m. Double Staked.

Conifers:  
120-150cm, pot grown. Single Staked.



For Planning



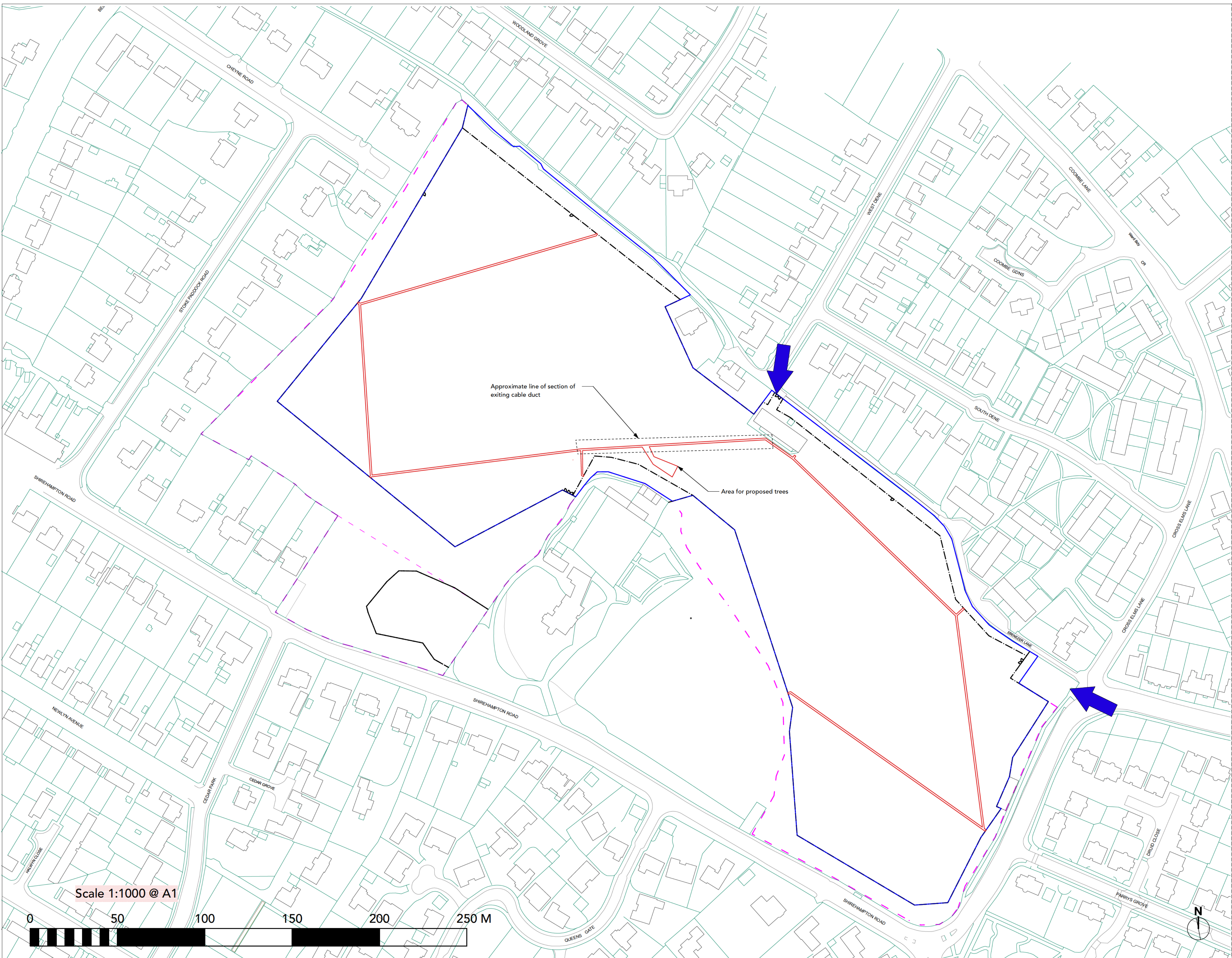
LEGEND

- School Boundary
- Red line extent of planning application area
- Fence line where different from school boundary
- Lease Boundary (approximate)
- Playing Field Main Access Points

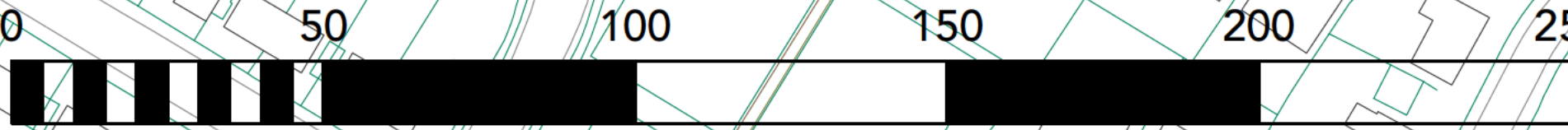
Notes

Site based on OS Survey data

Cabling to be laid between red lines.  
Area enclosed by red application line: 1000m²



Scale 1:1000 @ A1



For Planning

4D Landscape Design

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www.4dld.com



|           |                            |                |               |
|-----------|----------------------------|----------------|---------------|
| Project   | Cotham Fields              | September 2025 | 2025.07       |
| Title     | CCTV Application Site Plan |                |               |
| Scale @A1 | 1:1000                     | Drawing number | 2025 CCTV P01 |
|           |                            | Issue:         |               |

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## Appendix 2: Planning policy and guidance

### Introduction

This assessment has been written within the following legislative, planning policy and guidance context:

- National Heritage Act 1983 (amended 2002);
- Town and Country Planning Act (1990);
- Planning (Listed Buildings and Conservation Areas) Act (1990);
- National Planning Policy Framework (2025);
- Bristol Development Framework Core Strategy - Adopted June 2011;
- Planning Practice Guidance, Historic Environment (2025);
- Historic Environment Good Practice Advice in Planning: Note 2 - Managing Significance in Decision-taking in the Historic Environment (Historic England 2015)
- Historic Environment Good Practice Advice in Planning: Note 3 - The Setting of Heritage Assets (Historic England 2015);
- Conservation Principles: policies and guidance for the sustainable management of the historic environment (English Heritage 2008).

### Planning (Listed Buildings and Conservation Areas) Act (1990)

#### *66 General duty as respects listed buildings in exercise of planning functions*

(1) In considering whether to grant planning permission [F1 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.

(2) Without prejudice to section 72, in the exercise of the powers of appropriation, disposal and development (including redevelopment) conferred by the provisions of sections 232, 233 and 235(1) of the principal Act, a local authority shall have regard to the desirability of preserving features of special architectural or historic interest, and in particular, listed buildings.

(3) The reference in subsection (2) to a local authority includes a reference to a joint planning board F

(4) Nothing in this section applies in relation to neighbourhood development orders.

#### *72 General duty as respects conservation areas in exercise of planning functions*

(1) In the exercise, with respect to any buildings or other land in a conservation area, of any [F1 functions under or by virtue of] 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) The provisions referred to in subsection (1) are the planning Acts and Part I of the Historic Buildings and Ancient Monuments Act 1953 [F2 and sections 70 and 73 of the Leasehold Reform, Housing and Urban Development Act 1993].

(3) In subsection (2), references to provisions of the Leasehold Reform, Housing and Urban Development Act 1993 include references to those provisions as they have effect by virtue of section 118(1) of the Housing Act 1996.

(4) Nothing in this section applies in relation to neighbourhood development orders.

#### **National Planning Policy Framework (NPPF; February 2025)**

##### ***16. Conserving and enhancing the historic environment***

202. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

203. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- d) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- e) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- f) the desirability of new development making a positive contribution to local character and distinctiveness; and
- g) opportunities to draw on the contribution made by the historic environment to the character of a place.

204. When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

205. Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) assess the significance of heritage assets and the contribution they make to their environment; and
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

206. Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

##### ***Proposals affecting heritage assets***

207. 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.

208. 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

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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.

209. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

210. In determining 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.

211. In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

#### *Considering potential impacts*

212. 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.

213. 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.

214. 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.

215. 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.

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216. 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.

217. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

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

219. 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.

220. 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.

221. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies, but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

## **Planning Policy Guidance (PPG)**

### *Setting*

On ‘setting’, the PPG sets out (para. 013 Reference ID: 18a-013-20190723) that “All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset’s curtilage may not have the same extent”.

It continues “The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time”.

Harm

The PPG sets out further information on the degrees of harm which might result from development affecting a heritage asset (para. 018 Reference ID: 18a-018-20190723). It states “Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 194-196) apply. Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated”.

It continues “Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. 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 additions to historic buildings where those additions are inappropriate and harm the buildings’ 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, depending on the nature of their impact on the asset and its setting”.

A further section addresses the concept of harm in a Conservation Area situation (para. 019 Reference ID: 18a-019-20190723). It states that “Paragraph 201 of the National Planning Policy Framework is the starting point. An unlisted building that makes a positive contribution to a conservation area is individually of lesser importance than a listed building. If the building is important or integral to the character or appearance of the conservation area then its proposed demolition is more likely to amount to substantial harm to the conservation area, engaging the tests in paragraph 195 of the National Planning Policy Framework. Loss of a building within a conservation area may alternatively amount to less than substantial harm under paragraph 196. However, the justification for a building’s proposed demolition will still need to be proportionate to its relative significance and its contribution to the significance of the conservation area as a whole. The same principles apply in respect of other elements which make a positive contribution to the significance of the conservation area, such as open spaces”.

#### *Public benefit*

An important aspect of the assessment of harm is the identification of public benefit to a proposal which would offset the harm identified. The PPG states (Para 020 Reference ID: 18a-020-20190723) “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). 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; or

- securing the optimum viable use of a heritage asset in support of its long-term conservation.

***Local planning policy: Bristol Development Framework Core Strategy - Adopted June 2011***

***Policy BCS22***

Development proposals will safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance including:

- Scheduled ancient monuments;
- Historic buildings both nationally and locally listed;
- Conservation areas;
- Historic parks and gardens both nationally and locally listed;
- Archaeological remains.

**Guidance**

This assessment has been conducted with reference to guidance documents produced by Historic England since 2008, and, where appropriate, in accordance with the Chartered Institute for Archaeologists' Standards and Guidance for Historic Environment Desk-Based Assessment (CIfA 2014), as set out below.

**Historic Environment Good Practice Advice in Planning: Note 2 - Managing Significance in Decision-taking in the Historic Environment**

The GPA note advises a 6-stage approach to the identification of the significance of a heritage asset and the potential effects on its significance resulting from any development.

The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest. A variety of terms are used in designation criteria (for example outstanding universal value for world heritage sites, national importance for Scheduled Monuments and special interest for Listed Buildings and Conservation Areas), but all of these refer to a heritage asset's significance.

The list of Steps is set out below, however the GPA does add "...it is good practice to check individual stages of this list, but they may not be appropriate in all cases and the level of detail applied should be proportionate. For example, where significance and/or impact are relatively low, as will be the case in many applications, only a few paragraphs of information might be needed, but if significance and impact are high then much more information may be necessary".

The recommended Steps are as follows:

1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change; and
6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

Regarding the application process, the GPA offers the following advice: "Understanding the nature of the significance is important to understanding the need for and best means of

conservation. For example, a modern building of high architectural interest will have quite different sensitivities from an archaeological site where the interest arises from the possibility of gaining new understanding of the past.

Understanding the extent of that significance is also important because this can, among other things, lead to a better understanding of how adaptable the asset may be and therefore improve viability and the prospects for long term conservation.

Understanding the level of significance is important as it provides the essential guide to how the policies should be applied. This is intrinsic to decision-taking where there is unavoidable conflict with other planning objectives”.

Regarding the assessment of the significance of a heritage asset, the GPA also states that the “...reason why society places a value on heritage assets beyond their mere utility has been explored at a more philosophical level by English Heritage in Conservation Principles (2008). Conservation Principles identifies four types of heritage value that an asset may hold: aesthetic, communal, historic and evidential value. This is simply another way of analysing its significance. Heritage values can help in deciding the most efficient and effective way of managing the heritage asset to sustain its overall value to society”.

For the purposes of this assessment and in line with Conservation Principles, the assessment of significance will include an assessment of a heritage asset’s communal value.

### **Historic Environment Good Practice Advice in Planning: Note 3 - The Setting of Heritage Assets**

GPA note 3. expands on the six stages outlined in GPA Note 2, as set out above.

#### *Step 1: identifying the heritage assets affected and their settings*

The starting point of any assessment is the identification of those heritage assets likely to be affected by the proposed development. For this purpose, if the proposed development is seen to be capable of affecting the contribution of a heritage asset’s setting to its significance or the appreciation of its significance, it can be considered as falling within the asset’s setting.

#### *Step 2: Assessing whether, how and to what degree these settings contribute to the significance of the heritage asset(s)*

This Step provides a checklist of the potential attributes of a setting that it may be appropriate to consider defining its contribution to the asset’s heritage values and significance. Only a limited selection of the possible attributes listed below is likely to be important in terms of any single asset.

The asset’s physical surroundings

- Topography;
  - Other heritage assets (including buildings, structures, landscapes, areas or archaeological remains);
  - Definition, scale and ‘grain’ of surrounding streetscape, landscape and spaces;
  - Formal design;
  - Historic materials and surfaces;
  - Land use;
  - Green space, trees and vegetation;
  - Openness, enclosure and boundaries;
  - Functional relationships and communications;
-

- History and degree of change over time;
- Integrity; and
- Issues such as soil chemistry and hydrology.

#### Experience of the asset

- Surrounding landscape or townscape character;
- Views from, towards, through, across and including the asset;
- Visual dominance, prominence or role as focal point;
- Intentional intervisibility with other historic and natural features;
- Noise, vibration and other pollutants or nuisances;
- Tranquillity, remoteness, 'wildness';
- Sense of enclosure, seclusion, intimacy or privacy;
- Dynamism and activity;
- Accessibility, permeability and patterns of movement;
- Degree of interpretation or promotion to the public;
- The rarity of comparable survivals of setting;
- The asset's associative attributes;
- Associative relationships between heritage assets;
- Cultural associations;
- Celebrated artistic representations; and
- Traditions.

#### *Step 3: Assessing the effect of the proposed development on the significance of the asset(s)*

The third stage of the analysis is to identify the range of effects that any Proposed Development may have on setting(s), and to evaluate the resultant degree of harm or benefit to the significance of the heritage asset(s).

The following checklist sets out the potential attributes of any proposed development which may affect setting, and thus its implications for the significance of the heritage asset. Only a limited selection of these is likely to be particularly important in terms of development.

#### Location and siting of development

- Proximity to asset;
- Extent;
- Position in relation to landform;
- Degree to which location will physically or visually isolate asset; and
- Position in relation to key views.

#### The form and appearance of the development

- Prominence, dominance, or conspicuousness;
  - Competition with or distraction from the asset;
  - Dimensions, scale and massing;
  - Proportions;
  - Visual permeability (extent to which it can be seen through);
  - Materials (texture, colour, reflectiveness, etc);
  - Architectural style or design;
  - Introduction of movement or activity; and
  - Diurnal or seasonal change.
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#### Other effects of the development

- Change to built surroundings and spaces;
- Change to skyline;
- Noise, odour, vibration, dust, etc.;
- Lighting effects and ‘light spill’;
- Change to general character (e.g. suburbanising or industrialising);
- Changes to public access, use or amenity;
- Changes to land use, land cover, tree cover;
- Changes to archaeological context, soil chemistry, or hydrology; and
- Changes to communications/accessibility/permeability.

#### Permanence of the development

- Anticipated lifetime/temporariness;
- Recurrence; and
- Reversibility.

#### Longer term or consequential effects of the development

- Changes to ownership arrangements;
- Economic and social viability; and
- Communal use and social viability.

#### *Step 4: Maximising enhancement and minimising harm*

Enhancement may be achieved by actions including:

- removing or re-modelling an intrusive building or feature;
- replacement of a detrimental feature by a new and more harmonious one;
- restoring or revealing a lost historic feature or view;
- introducing a wholly new feature that adds to the public appreciation of the asset;
- introducing new views (including glimpses or better framed views) that add to the public experience of the asset; or
- improving public access to, or interpretation of, the asset including its setting

Options for reducing the harm arising from development may include the relocation of a development or its elements, changes to its design, the creation of effective long-term visual or acoustic screening, or management measures secured by planning conditions or legal agreements.

#### *Step 5: Making and documenting the decision and monitoring outcomes*

Step 5 identifies the desirability of making and documenting the decision-making process and monitoring outcomes.

For the purposes of this assessment Stages 1 to 3 have been followed, with Stage 4 forming, if/where appropriate, part of the recommendations.

#### **Chartered Institute for Archaeologists: Standard and guidance for historic environment desk-based assessment (published December 2014; updated January 2017; updated October 2020)**

This heritage statement has also been completed in line with guidance issued by the Chartered Institute for Archaeologists (CIfA). Armour Heritage is enrolled with the CIfA as a corporate entity and is recognised as a CIfA Registered Organisation.

This document has been completed in line with the CIfA Standard, as set out in the aforementioned document, which states: “Desk-based assessment will determine, as far as is

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reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area. Desk-based assessment will be undertaken using appropriate methods and practices which satisfy the stated aims of the project, and which comply with the Code of conduct and other relevant regulations of ClfA. In a development context desk-based assessment will establish the impact of the proposed development on the significance of the historic environment (or will identify the need for further evaluation to do so) and will enable reasoned proposals and decisions to be made whether to mitigate, offset or accept without further intervention that impact”.



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