

Bath and North East Somerset Council

Local Plan 2025 – 2043

Pre-Submission Draft Local Plan (Reg 19)

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Whitchurch Village Heritage Topic Paper

**Bath & North East
Somerset Council**

Improving People's Lives

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1. Introduction

1.1 This Heritage Topic Paper has been prepared to support the allocation of development sites at Whitchurch Village, namely East Whitchurch and South-west Whitchurch, within the emerging B&NES Local Plan. The sites lie within the setting of a number of designated heritage assets and have been the subject of detailed heritage assessment as part of the plan-making process.

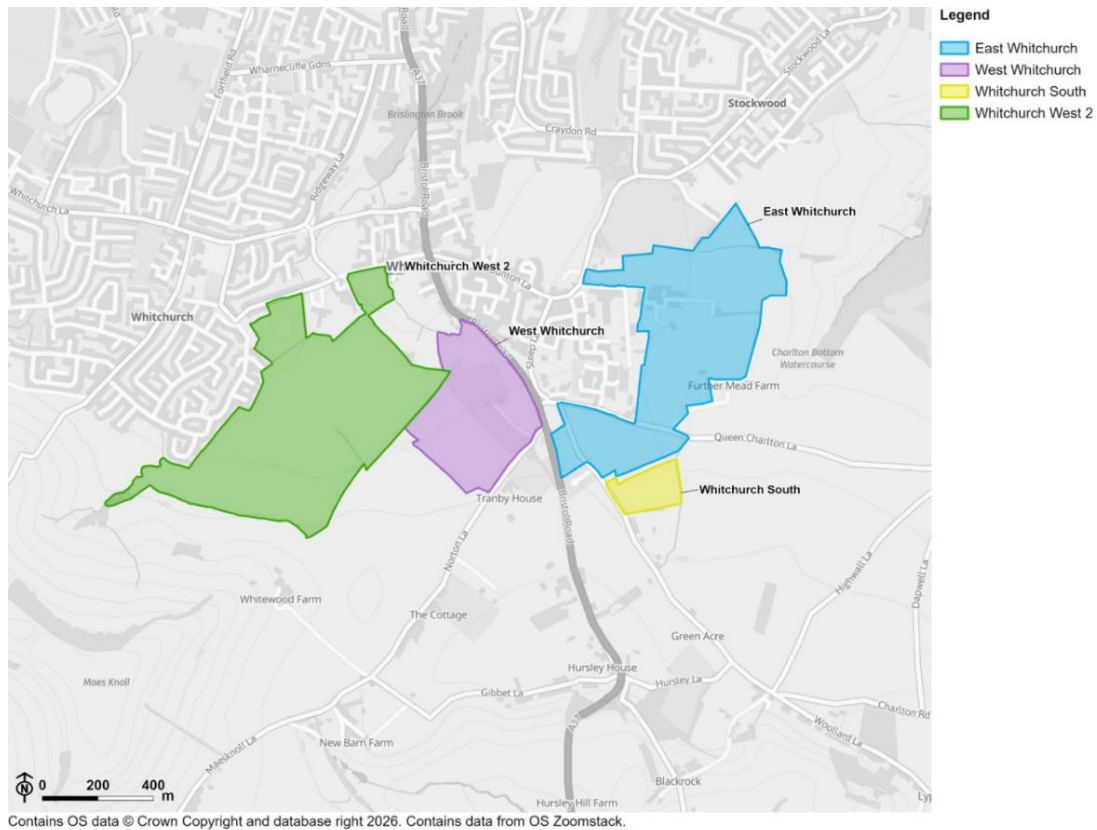
1.2 The purpose of this paper is to demonstrate that the Council has given careful consideration to the significance of affected heritage assets, the contribution made by their settings, and the likely effects arising from the allocation of the sites. The paper explains the evidence that has informed the Council's assessment and the reasons why the sites are considered suitable for allocation notwithstanding the impact on identified heritage impacts.

1.3 The Topic Paper refers throughout to heritage evidence produced by LUC, which has been relied upon to prepare the Local Plan and inform the site selection process. This Topic Paper should be read in conjunction with the LUC evidence paper.

1.4 Please note that throughout the LUC evidence paper, the names of the sites used for heritage assessment purposes differ to the names of the allocations. For avoidance of doubt, the differences are noted as follows:

- LUC Paper refers to 'East Whitchurch' and 'Whitchurch South' – both of these sites make up the Draft Local Plan allocation 'East Whitchurch Village'.
- LUC paper refers to 'West Whitchurch' and 'Whitchurch West 2' – both of these sites make up the Draft Local Plan allocation 'South-west Whitchurch Village'.

1.5 The LUC mapping below shows the breakdown of the sites assessed.



2. Identification of heritage assets and assessment of harm

2.1 LUC's heritage assessment identifies and sets out the designated heritage assets affected by the site allocation, their significance, and the contribution made by setting to that significance. It then assesses how development might alter the setting of the assets, and the likely harm that would arise.

2.2 Details of how development might alter the setting of the assets are set out in the LUC report, and the harm that would likely arise through allocation and development of the sites is summarised in the tables below:

Level of effect	Description
High	A large magnitude of change (e.g. major, total or near total loss) to the heritage significance of an asset of medium or high importance.
Medium	A medium magnitude of change (e.g. moderate loss or alteration) to the heritage significance of an asset of medium or high importance; or a large magnitude of change (total or near total loss) to an asset of low importance.

Low	A small magnitude of change (slight loss or alteration) to the heritage significance of an asset of medium or high importance; a medium or small (slight to substantial loss or alteration) to the heritage significance of an asset of low importance; or any change to a historic asset of very low importance.
Negligible	No change to the heritage significance of the asset.

Site	Whitchurch West 2 (South-west Whitchurch Allocation)	Whitchurch West (South-west Whitchurch Allocation)	Whitchurch South (East Whitchurch Allocation)	East Whitchurch (East Whitchurch Allocation)	Indicative cumulative effect
Asset	Level of effect / Level of harm for NPPF	Level of effect / Level of harm for NPPF	Level of effect / Level of harm for NPPF	Level of effect / Level of harm for NPPF	Level of effect / Level of harm for NPPF
Maes Knoll hillfort	Medium Less than Substantial	Medium Less than Substantial	Medium Less than Substantial	Low Less than Substantial	High Less than Substantial
The Wansdyke	Low Less than Substantial	Low Less than Substantial	Low Less than Substantial	Low Less than Substantial	Medium Less than Substantial
Listed buildings within Whitchurch village	Low Less than Substantial	Low Less than Substantial	Low Less than Substantial	Low Less than Substantial	Low Less than Substantial
Whitewood Farmhouse	Medium Less than Substantial	Medium Less than Substantial	Low Less than Substantial	Low Less than Substantial	Medium Less than Substantial
Lyon's Court Farmhouse	High Less than Substantial	Low Less than Substantial	Low Less than Substantial	Low Less than Substantial	High Less than Substantial
Assets within Queen Charlton and Queen Charlton Conservation Area	-	Low-None Less than Substantial	Low Less than Substantial	Low Less than Substantial	Low Less than Substantial

Higher Levels of Heritage Harm Identified by the LUC Assessment

2.3 While the LUC assessment identifies a range of effects across heritage assets, the greatest levels of harm arise in relation to Lyon's Court Farmhouse and the cumulative impact of the allocations on Maes Knoll hillfort. These examples are particularly important because they represent the upper end of the spectrum of effects identified through the assessment. Nevertheless, LUC concludes that both remain within the category of less than substantial harm.

Lyon's Court Farmhouse

2.4 LUC identifies a high level of effect on Lyon's Court Farmhouse arising from development of the Whitchurch West 2 site (South-west Whitchurch allocation), and the cumulative impact of all site allocations. The significance of the Grade II* listed building derives not only from its architectural and historic interest as a former manor house and farmhouse, but also from its relationship with the surrounding agricultural land. The assessment notes that the allocation contains much of the remaining farmland associated with the historic farm, and that these fields are particularly important because development elsewhere has already reduced the asset's historic rural setting.

2.5 LUC concludes that development would result in the loss of much of the asset's remaining agricultural setting and would substantially alter how the building is experienced and understood. The farmhouse would become integrated into the expanded settlement rather than being experienced within a rural landscape, reducing appreciation of its historic function and relationship with the surrounding agricultural land. Although some open space is retained around the asset and the building itself, its curtilage and associated historic structures would remain unaffected, the assessment concludes that harm to significance would remain high.

2.6 However, LUC concludes that this harm would not amount to substantial harm for the purposes of national policy. The report notes that the physical fabric of the

listed building would remain intact, together with its principal relationship with the surviving farmstead buildings. Applying the principles established through relevant case law, LUC concludes that although the level of less than substantial harm would be at the upper end of the spectrum, the asset's significance would not be so diminished that substantial harm would arise.

Cumulative Effects on Maes Knoll Hillfort

2.7 LUC also identifies a high cumulative level of effect on Maes Knoll hillfort arising from the combined development of the Whitchurch allocations. The significance of the scheduled monument is closely linked to its elevated position within an extensive agricultural landscape. The openness of the surrounding countryside contributes to understanding the hillfort's strategic location, defensive function, landmark qualities and relationship with the wider historic landscape.

2.8 The assessment concludes that, taken together, development across the allocations would extend the settlement edge southwards and create a more continuous presence of built development within views from the hillfort. Whitchurch West 2 (part of the South West Whitchurch allocation) is identified as contributing the greatest effect because of its proximity and prominence, but the combined effect of the allocations would further erode the open agricultural setting that currently contributes to the monument's significance. LUC considers that development would alter both strategic views from the monument and the way it is experienced within the wider landscape.

2.9 Nevertheless, LUC concludes that the cumulative effect, whilst significant, would still constitute less than substantial harm in NPPF terms. The report recognises a substantial erosion of the open setting of the hillfort, but not to such an extent that its significance would be fundamentally lost. The monument would remain legible and appreciable as a dominant landscape feature, albeit within a changed context.

Context for Public Benefits Assessment

2.10 The examples above have been highlighted because they represent the most significant heritage effects identified by the LUC assessment. They illustrate the higher end of the less than substantial harm spectrum and therefore provide the most relevant context for the planning balance required by national policy. Later on, this report considers the public benefits arising from the allocations and the extent to which those benefits outweigh the identified heritage harm. This balancing exercise is important for assets, but is particularly important in relation to the higher levels of harm identified for Lyon's Court Farmhouse and the cumulative effects on Maes Knoll.

2.11 This summary should be read alongside the full LUC Heritage Impact Assessment, which contains the detailed analysis of significance, setting, effect and mitigation for all affected heritage assets.

3. Minimising harm through site specific policy

3.1 The Council has had careful regard to the heritage mitigation recommendations set out in the LUC assessment and, where appropriate, has incorporated them into the site allocation requirements. Across the Whitchurch allocations, this has resulted in a range of measures to avoid, minimise and mitigate potential harm to heritage assets, particularly Maes Knoll hillfort, Queen Charlton Conservation Area, St Nicholas' Church, Lyon's Court Farmhouse and Whitewood Farmhouse.

3.2 Key measures include locating sports pitches and strategic open space within the most sensitive parts of sites to retain openness; retaining historic landscape features and rights of way where possible; controlling building height and density in sensitive locations; and requiring green infrastructure, landscaping and boundary treatments to soften settlement edges and reduce visual impacts. Site allocations also require development to respond positively to local landscape character, heritage significance and settlement form.

3.3 In a small number of instances, the Council has not followed LUC's recommendations in full. Most notably, land alongside the A37 at East

Whitchurch has been retained within the developable area. Having balanced heritage considerations against the need to create a well-designed gateway to the new neighbourhood, local centre and primary school, the Council concluded that the recommendation's objectives could instead be achieved through site-specific design, landscaping and placemaking requirements.

3.4 Overall, the site allocation requirements embed the mitigation measures identified through the heritage assessment process and seek to ensure that development conserves and, where possible, enhances the significance and setting of affected heritage assets, both individually and cumulatively.

3.5 The table below sets out each of LUC's mitigation recommendations, followed by a description of how the Council has responded in preparing the site allocations:

Site	LUC Mitigation Recommendation	Site Allocation Response / Requirement
West Whitchurch (South-west Whitchurch allocation)	Utilising the fields within the south of the site as sports pitches reduces harm to Maes Knoll hillfort by retaining openness closest to the asset.	Sports pitches relocated to the south of the site, with development focused closer to the A37.
West Whitchurch (South-west Whitchurch allocation)	Areas within the north-east of the site are less sensitive to change.	Sports pitches relocated to the south of the site, with development focused closer to the A37.
West Whitchurch (South-west Whitchurch allocation)	Keep development within the existing landscape structure.	Allocation incorporates requirements for retention of historic landscape features.
West Whitchurch (South-west Whitchurch allocation)	Use landscape design and green infrastructure to soften development edges whilst retaining landscape openness.	Allocation requires strategic green infrastructure, landscaping and open space provision.
All sites	Development should reflect the form, layout	Allocation requires development to respond

	and scale of adjacent development.	positively to local character, settlement pattern and heritage context. Lower densities are required on more sensitive parts of sites.
West Whitchurch (South-west Whitchurch allocation)	Restrict development south of the hedge line crossing the site.	Sports pitches relocated to the south of the site and the proposed Green Belt boundary limits development extent.
East Whitchurch	Retain the field adjoining the A37 as open space.	The Council concluded that this parcel performs an important placemaking function as a gateway location for the new neighbourhood, local centre and primary school. Heritage impacts will be addressed through design, landscaping and open space requirements.
East Whitchurch	Retain land east of the A37 and west of Woollard Lane as green infrastructure and use planting to screen views from Queen Charlton.	The Council concluded that this parcel performs an important placemaking function as a gateway location for the new neighbourhood, local centre and primary school. Heritage impacts will be addressed through design, landscaping and open space requirements.
South Whitchurch (East Whitchurch allocation)	Provide landscaping and green infrastructure along site boundaries.	Allocation requires planting and landscaping to soften settlement edges and minimise visual effects.
West Whitchurch 2 (South-west Whitchurch allocation)	Development should be of exemplary design quality and fit sensitively within the historic landscape.	Allocation requires exemplary design standards and a strong response to the site's historic landscape setting.
West Whitchurch 2 (South-west Whitchurch allocation)	Retain southern fields as open land to reduce effects on Maes Knoll and Whitewood Farmhouse.	Allocation provides strategic public open space to the west and south of the site as part of a wider neighbourhood green space network.

West Whitchurch 2 (South-west Whitchurch allocation)	Restrict height of development near St Nicholas' Church and retain historic routes and landscape features.	Allocation limits development adjacent to the church to 9 metres, protects historic rights of way and seeks retention of historic landscape features.
West Whitchurch 2 (South-west Whitchurch allocation)	Use sensitively designed landscaping and green infrastructure to soften visual impacts whilst retaining openness.	Allocation requires green infrastructure, landscaping and significant open space provision. Previously proposed woodland areas have been removed to maintain openness.
West Whitchurch 2 (South-west Whitchurch allocation)	Development should reflect local scale, materials and character.	Allocation requires development to respond positively to local context, heritage assets and landscape character.
Cumulative	Retain southern parts of the Taylor Wimpey and West Whitchurch sites as open land to reduce cumulative effects on Maes Knoll.	Sports pitches and strategic public open space are concentrated within the most sensitive southern areas.
Cumulative	Soften development edges through retention of landscape features and boundary treatments.	Allocation requires landscaping and planting along development boundaries.
Cumulative	Maximise open space and green infrastructure. Where this is not possible, prioritise lower-scale development.	Allocation requires strategic green infrastructure, extensive open space and context-responsive development.
Cumulative	New vegetation should be sensitively designed so as not to harm perceptions of openness.	Previously proposed woodland areas have been removed from allocation requirements to preserve openness.
Cumulative	Development scale, form and materials should reflect existing development patterns.	Allocation requires development to respond positively to local character, heritage assets and settlement form.

4. National Policy Context

4.1 Although a revised National Planning Policy Framework (NPPF) came into effect on 17 August 2026, the B&NES Local Plan 2025-2043 is being prepared under the transitional arrangements and will therefore be examined against the December 2024 NPPF, as amended in February 2025. Consequently, the assessment of heritage effects and the balancing exercise set out in this paper are undertaken primarily against the requirements of that version of national policy.

4.2 The 2026 NPPF is nevertheless a relevant consideration, principally because it introduces a revised structure for heritage policy and replaces the long-established distinction between 'substantial' and 'less than substantial' harm with a broader spectrum of effects. Under the 2026 framework, effects are categorised as positive effects, no effects, harm, substantial harm, or total loss. To assist interpretation, the LUC assessment presents its findings using both the terminology of the 2024 NPPF and an indication of how effects would align with the 2026 approach.

Draft Local Plan Assessment

4.3 The LUC assessment concludes that the effects on affected heritage assets range from low to high levels of effect. Importantly, all identified harm falls within the category of less than substantial harm for the purposes of the NPPF 2024, although in some cases, notably Lyon's Court Farmhouse and the cumulative effects on Maes Knoll hillfort, the harm is assessed as being towards the upper end of that spectrum.

NPPF 2024

4.4 The 2024 NPPF at paragraph 219 states that 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.

NPPF 2026

4.5 The revised approach in the 2026 NPPF is similar in effect. Policy HE6.4 requires any harm to the significance of a designated heritage asset to be weighed against the public benefits arising from the proposal. While the terminology has changed, the fundamental requirement to balance heritage effects against public benefits remains.

5. Public benefits of the allocations

5.1 The public benefits of the allocations are set out as follows:

- The Whitchurch Village allocations will deliver approximately 1,700 new homes, including affordable homes, contributing significantly towards the Local Plan housing requirement.
- The allocations are expected to deliver approximately 680 affordable homes, making a substantial contribution towards the significant identified affordable housing needs of the district.
- The allocations are central to delivering the Local Plan's spatial strategy by directing growth to a sustainable location with access to employment opportunities, services, public transport and connections to Bristol.
- In addition, the allocations will also provide:
 - A new transport hub on the A37
 - New local services, including a small convenience shop
 - Significant areas of public open space
 - Strategic green infrastructure
 - Biodiversity net gain and wider nature recovery benefits

- The opportunity to better manage the impact of development on the heritage assets through the evidence-based site-specific policy requirements.

6. Balancing harm with public benefits

6.1 The Council has carefully assessed the significance of affected heritage assets and the contribution made by their setting. The evidence indicates that development of the allocation would result in less than substantial harm to significance through changes to setting.

6.2 The Council has sought to minimise that harm through site-specific policy requirements, including landscape mitigation, design requirements, and the protection of important views.

6.3 The Council has also considered the substantial public benefits arising from the allocation, including the delivery of housing and affordable housing, support for the spatial strategy of the Local Plan, infrastructure provision, and nature and biodiversity enhancements. Having undertaken the balancing exercise required by national policy, the Council concludes that these public benefits outweigh the identified less than substantial harm to heritage significance.