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INTRODUCTION

This chapter presents the findings of a desk based assessment of the potential effects the proposed development would have upon heritage assets in the vicinity of the Ling Hall landfill site.

12.1 The cultural heritage of an area includes archaeological sites, historic buildings, parks, gardens and designed landscapes, historic battlefields and other historic environment features (heritage assets). It also includes features or places which have the capacity to provide information about past human activity, or which have cultural significance due to associations with literary or artistic work, folklore or historic events.

12.2 As noted from Chapter 3 above, the planning application seeks to amend the cessation date for the operation of the Ling Hall Landfill site. The application site is an established landfill which is progressively infilling former sand and gravel workings. It has been in continuous operation since c. 1993. In addition to the landfill the applicant has secured planning permission for three other waste management uses: a street sweeping recycling facility; an IBA\(^1\) processing facility; and a green waste composting facility. Also, within the general boundary of the Site are a concrete batching plant and roadstone coating plant, both operated by Breedon Southern Limited. These two operations do not form part of the current proposals. The planning history of the Site is set out in Chapter 2 of this ES.

12.3 The cultural heritage baseline is identified within and Inner and an Outer Study Area, defined in Appendix 12/1, with reference to the wider region. The study addresses potential direct and indirect effects, the potential need for mitigation measures and any cumulative effects.

12.4 Designated assets are assets of the highest heritage significance (see Appendix 12/1, Table 12.1.1) and potentially comprise:

- World Heritage Sites;
- Scheduled Monuments;
- Listed Buildings;
- Registered Battlefields
- Registered Parks and Gardens; and
- Conservation Areas.

\(^1\) Incinerator Bottom Ash
12.5 This assessment has been undertaken by SLR Consulting Ltd, which is a Registered Organisation with the Chartered Institute for Archaeologists (CIfA).

Assessment Methodology

12.6 The methods employed in this assessment are set out in Appendix 12/1, which details: the Study Areas employed; the sources of data consulted; and the method by which the heritage significance, magnitude of impact and significance of effect are identified for individual assets.

12.7 Heritage assets within the Inner and Outer Study Areas are numbered in the following text as set out in Appendix 12/2: Designated Assets, and 12/3: Non-Designated Assets. The study areas are shown in Drawing LH 12/1.

Consultation

12.8 Consultation with statutory bodies was carried out on 18th of June 2019 as part of a formal EIA Scoping exercise. Historic England and Warwickshire County Council did not respond to the scoping letter.

12.9 Consultation with Warwickshire County Council was also undertaken via telephone on 28th of November 2019 for discussion on what mitigation had previously undertaken and further clarity on previous works at the site.

Effects Scoped Out from Cultural Heritage Assessment.

12.10 The noise levels of the current works would form the baseline information of any assessment of noise. There are no proposals to increase the number of vehicle movements, to change the operating hours or change the location or operating method of the processing plant. It is not considered that the works within the application site would increase current noise levels. No significant noise impacts are anticipated and impacts from noise upon cultural heritage assets have been scoped out of this ES.

LEGISLATION, PLANNING POLICY AND GUIDANCE

Legislation

12.11 The key relevant legislation is the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires the Secretary of State to compile a list of buildings of ‘special architectural or historic interest’. The Act imposes an obligation on the Secretary of State and the LPA (as appropriate) to have special regard to the desirability of preserving the listed building or its setting².

² Sections 16(2) when determining applications for listed building consent, and 66(1) when determining planning applications.
National Policy

12.12 In the National Planning Policy Framework (February 2019)\(^3\), Section 16 deals with the conservation and enhancement of the historic environment. This Section requires that, 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 (Paragraph 193).

12.13 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 (Paragraph 194). 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.

12.14 Footnote 63 to 194b, also notes 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.

12.15 Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset (Paragraph 195), 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.

12.16 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 (Paragraph 196).

12.17 The effect of an application on the significance of a non-designated heritage asset should be considered in determining the application. In weighing applications that directly or indirectly affect

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\(^3\) [Link](https://www.gov.uk/government/publications/national-planning-policy-framework)
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 (Paragraph 197).

12.18 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 (Paragraph 198).

12.19 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 (Paragraph 199).

Local Development Policy:

12.20 As noted from Chapter 5 above, the Rugby Borough Council Local Plan (2011-2031) has one policy pertaining to the historic environment, namely ‘Policy SDC3: Protecting and Enhancing the Historic Environment’.

Guidance

12.21 Three relevant pieces of guidance have been published by Historic England or the professional archaeological body, the Chartered Institute for Archaeologists (CIfA). These publications are:

- Chartered Institute for Archaeologists 2014: Standard and Guidance for Historic Environment Desk Based Assessment; and
- Chartered Institute for Archaeologists 2014b: CIfA Code of Conduct.

ASSESSMENT OF HISTORIC ENVIRONMENT EFFECTS

Historic Environment Baseline

Introduction

12.22 The proposed development is located approximately 1.5km to the south west of the outskirts of Rugby. The surrounding area comprises low ridges and valleys lying between the towns of Leamington Spa, Coventry and Rugby, known as Dunsmore. Dunsmore retains a character of historic heathland and woodlands (Natural England NE469). The application site lies in an area of agricultural fields crossed by small rivers or streams. The application site is underlain Dunsmore Sand and Gravels of the Anglian Stage, a period of glaciation between 478,000 to 424,000 years ago.
12.23 All non-designated and designated assets are shown in Drawing LH 12/1 and LH 12/2, and listed, with SLR's numbering, in Appendix 12/2 and 12/3. Where heritage assets are referenced in this chapter they are identified by their SLR Number. Heritage events in are referenced in Drawing LH 12/4 by their Historic Environment Record (HER) number (e.g. EWA867) to avoid confusion, as these are also associated with identified heritage assets.

Designated Heritage Assets

12.24 There are no world heritage sites, registered battlefields, registered parks and gardens or conservation areas within the study areas. There are no designated heritage assets within the application site.

12.25 Within the Outer Study Area there are one scheduled monument and seven listed buildings. The scheduled monument, Lawford Heath (1020937), is a prehistoric double pit alignment with associated features, located on a gravel plateau known as Lawford Heath. The scheduled site is of the highest heritage significance (Table 12.1.1). The pit alignment is part of a more extensive alignment which has been recorded, intermittently, over a distance of about 2.5km. All listed buildings are grade II listed, and therefore of high importance (Table 12.1.1).

Table 12.1
Listed Buildings within the Outer Study Area

<table>
<thead>
<tr>
<th>Name</th>
<th>Listing Number</th>
<th>Grade</th>
<th>Description</th>
<th>Distance from Development</th>
</tr>
</thead>
<tbody>
<tr>
<td>Limestone Hall Farm House</td>
<td>1034905</td>
<td>II</td>
<td>Early 19th century farm house</td>
<td>1.4km</td>
</tr>
<tr>
<td>Lawford Hill Farm House</td>
<td>1299648</td>
<td>II</td>
<td>Mid-18th century farm house</td>
<td>1.0km</td>
</tr>
<tr>
<td>Lawford Lodge Farm and Attached Barn</td>
<td>1365090</td>
<td>II</td>
<td>17th Century farm house with later additions in 18th Century</td>
<td>0.19km</td>
</tr>
<tr>
<td>Cawston Farm House</td>
<td>1390996</td>
<td>II</td>
<td>Former 17th century farm house</td>
<td>1.46km</td>
</tr>
<tr>
<td>Park Farm House</td>
<td>1185647</td>
<td>II</td>
<td>Late 18th century farm house</td>
<td>0.46km</td>
</tr>
<tr>
<td>Limekiln Farmhouse</td>
<td>1034876</td>
<td>II</td>
<td>18th century farm house</td>
<td>1.7km</td>
</tr>
<tr>
<td>Manor Farm House and Attached Wall and Gateway</td>
<td>1034881</td>
<td>II</td>
<td>Early 18th century farm house</td>
<td>0.39km</td>
</tr>
</tbody>
</table>

Non-Designated Heritage Assets within the Inner and Outer Study Areas

12.26 The application site was subject to a programme of archaeological investigations in c. 1995 prior to the development in the quarry. There have been subsequent archaeological works by Warwickshire Archaeology, with ongoing site investigations since 1992. Previous archaeological works can be
seen in Drawing LH 12/4. Within the 2km Study Area heritage assets include 37 prehistoric sites; 5 Roman sites; 16 Medieval Sites; 17 Post-Medieval sites; 17 modern sites; and 60 heritage assets of unknown date.

Prehistoric Sites (10,000BC-43AD)

12.27 Of the earlier prehistoric periods, within the Inner Study Area there is one Mesolithic find of worked flint within the Inner Study Area (SLR No 126).

12.28 Within the Outer Study Area, approximately 0.13km to the north-west of the application site, a Neolithic flint scatter was identified (SLR No 151). There are a further 10 finds of Neolithic flints in the Outer Study Area (SLR Nos 133, 143, 145, 47, 130, 142, 144, 151).

12.29 Bronze age features within the Inner Study Area include linear features, (SLR No 108), pit alignments (SLR No 112), and a Bronze Age burial (SLR No 126). Within the Outer Study Area, approximately 0.79km to the south west of the application site there are multiple potential Bronze Age pit alignments that were identified from aerial photography (SLR No 41, 87, 88 and 89).

12.30 Heritage assets of the Iron Age period within the Inner Study Area evidence of settlement (SLR No 107, 124, 98) and land boundary pit alignments (SLR No 102, 41 and 87). Evidence from the pit alignments indicates multiple periods of occupation.

12.31 Iron Age sites within the Outer Study Area include potential ring ditches and further settlement (SLR No 11, 89, 21), approximately 1.4km to the east of the Inner Study Area.

Roman (43AD-600AD)

12.32 Within the Inner Study Area there have been domestic Roman features uncovered and recorded through archaeological investigation, (SLR No 127).

12.33 Roman sites that lie within the Outer Study Area include a potential Roman temple 200m to the north of the Inner Study Area, (SLR66) and a potential settlement 1.25km to the east of the Inner Study area (SLR No11). There are also two pits dating to the Roman Period to the east of the proposed development (SLR No, 2), and a Roman coin found 1km to the south of the Inner Study Area, (SLR No 152).

Medieval (600AD-1603)

12.34 There are no medieval sites within the Inner Study area. Within the Outer Study Areas there are twelve heritage assets dating to this medieval period (SLR No 9, 12, 22, 24, 34, 35, 51, 52, 59, 64, 82 and 126). Approximately 1.5km to the east of the application site, one cremation were found (SLR No 12). SLR No 24 is a ruined castle, located approximately 800m to the south of the application site. There is also a deserted settlement 1.14km to the south east of the Inner Study Area (SLR 52). The National Mapping Programme identified potential ridge and furrow within the Inner Study Area.
Post Medieval and Modern (1603-Present)

12.35 Within the Inner Study are there are the ruins of the World War II Military base RAF Church Lawford that was used to train pilot assessors, (SLR122). There is also a World War II pillbox to the south of the Inner Study Area, (SLR45). There were also a number of Modern sites to the south of the Inner Study Area, within the Outer Study Area such as a pleasure garden (SLR No 6) and modern enclosures, (SLR No 60) as well as other features, (SLR No, 3,4,5, 6, 7, 8, 10, 45, 60, 121, 122, 129, 131, 135, 137, 146).

12.36 In the Outer Study Area there are ruins of a small pox hospital dating to the 19th Century that lies 0.2km to the south east of the Inner Study Area, (SLR46). There is also a still in use railway that lies 500m to the south of the Inner Study Area, (SLR 100, 101, 117,118,119). As well as the site of a brick works (SLR No 53) and further sites to the south and south east of the site, (SLR No 14, 19, 29, 30, 31, 36, 53 and 138).

Undated

12.37 Undated sites range across the Inner and Outer Study Area and are often depicted as crop marks on aerial photographs. See Appendix 12/3.

Conclusions

12.38 The landscape today is dominated by post-medieval agricultural features. Within the Inner Study Area, the programme of archaeological works carried out to date has uncovered evidence for an Iron Age double pit alignment, interpreted as marking a significant land boundary. They have also identified evidence for Bronze Age to Iron Age settlement, and Bronze Age burial. Evidence of Roman remains, most likely Romano-British settlement and/or agricultural activity is less commonly occurring in the archaeological record to date but still present. The Inner Study Area also includes a World War II airfield, constructed in 1941.

Historic Mapping

12.39 Cartographic sources were examined from online sources (National Library of Scotland) as well as the map regression presented in the Desk Based Assessment Report produced by Golder Associates (2014). No additional heritage assets within the Inner Study Area were identified.

12.40 The 1st Series Ordnance Survey Map (1834) shows the application site bounded by minor farm access roads on all three sides, and traversed north to south by a route to Lawford Lodge via Ling Hall. 'Line's Spinny' is also shown on the western edge of the application alongside Coalpit Lane, potentially indicative of the historic pleasure gardens noted in the HER (SLR6). Apart from Lawford Lodge and Ling Hall the application site and immediate surrounds are undeveloped.

12.41 The Tithe Map (1850s) shows the land of the site, within the parish of Church Lawton, adjacent to the Manor of Thurston. Ling Hall is shown (and named in the accompanying apportionment) in the

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4 National Library of Scotland Digital Maps: https://www.nls.uk/
northern central portion of the Study Area. The Hall is surrounded by pasture and accessed by a trackway through the centre of the Study Area, roughly parallel with Coalpit Lane.

12.42 The 1905 Ordnance Survey Map shows encroaching development peripheral to the application site with Coal Pit Lane, Lawford Heath Lane and Ling Lane clearly marked. A route way intersecting the central portion of the site area is also in existence, providing access to Ling Hall and further north to Lawford Lodge where it meets Ling Lane. No other activity is shown in the site vicinity.

12.43 By 1955 the entire area of the application site is marked 'air field'. The intersection track to Ling Hall and the Hall itself are no longer shown. Three small rectangular structures are noted in the south eastern edge, presumably related to the flying school (SLR122).

12.44 These elements of the airfield and related infrastructure are also shown in the 1966 1:10,560 scale map with Church Lawford Aerodrome and the runway clearly marked across the centre of the application site. A concentration of associated buildings is shown in the south-eastern portion, north of Lawford Heath Lane. In addition, a small rectangular pond is also drawn on the western edge of the application site boundary, adjacent to Coalpit Lane. By 1975 the 1: 10,000 scale map of Warwickshire marks the airfield as 'abandoned'.

12.45 No further major changes are apparent on the 1:10,000 map (1990 – 1991) be it the extent of the airfield appears to have reduced, with only two sections of runway remaining along with a number of the aerodrome buildings demolished. 'Lawford Heath Industrial Estate' is drawn in the vicinity of the present landfill offices is shown south of the ponds alongside Coalpit Lane.

Aerial Photographs

12.46 Thirty aerial photographs provided by the HER were examined for additional heritage assets. No further assets were identified. The aerial photograph of the National Collection of Aerial Photography (NCAP) and Britain from Above on-line resources were searched for additional photographs, but none were available. National Mapping Programme Data was analysed, and any associated features were noted. The features were chiefly Ridge and Furrow. Further cropmarks that were also noted in the HER.

12.47 Historic England’s National Mapping Programme identified a series of crop marks within the Inner Study Area including potential Medieval ridge and furrow as well as features recorded in the HER (see Drawing LH 12/3).

Historic Landscape Characterisation

12.48 The Historic Landscape Characterisation (HLC) records the Inner Study Area and surrounding areas as former airfield (20th Century), and 18th century or later agricultural enclosures, in accordance with the historical mapping described above.

Potential for Unknown Heritage Assets

12.49 The cells of the landfill (Drawing LH 12/5) to the north and south have been restored. Cells to the north-east where not restored, are currently being infilled. Prior to the formation of the landfill sand and gravel has been extracted from beneath them, with the exception of the line of the former
runway of RAF Church Lawford. The potential for buried any archaeological features within the inner study area, therefore, lies below the former runway, be it there is potential that any remains could have been affected by the construction of the runway.

12.50 There is a moderate potential for prehistoric archaeological features within the Inner Study Area. The majority of these are likely to be Bronze Age or Iron Age in date, with a lesser potential for earlier periods.

12.51 There is a low to moderate potential for archaeological features of the Roman period within the Inner Study Area, although archaeological work previously undertaken to date suggests they are less frequently occurring than those of the later prehistoric periods.

12.52 There are several heritage assets of the medieval period south and east of the application site, however, there are no indications of medieval archaeology within the application site except ridge and furrow. The potential for medieval archaeological remains is low.

12.53 There is a moderate potential for archaeological remains of the post-medieval agricultural landscape, although these are likely to be of low significance only.

12.54 There is a moderate potential for archaeological remains of the modern period, notably from the former RAF Church Lawford, also likely to be of low importance.

**Assessment of Effects**

**Direct effects**

12.55 Direct effects on buried archaeology are limited to any surviving archaeological deposits beneath the runway of RAF Church Lawford. The runway itself is impacted upon by the installation of the concrete and coating plant, as well as the other waste recycling operations. There is some potential for archaeological remains beneath the runway, although construction of the runway and subsequent plant may previously have truncated any remains.

**Indirect Effects**

12.56 The scheduled monument of Lawford Heath (1020937) includes an Iron Age double pit alignment and associated features. It is an asset of the highest heritage significance. The monument lies adjacent to but beyond the south edge of the application site on a gravel plateau known as Lawford Heath. Cropmarks show that the pit alignment extended intermittently into the site, over a distance of approximately 2.5km, and evaluations and excavations undertaken in 1999-2000 showed that the other scheduled features also extended into the site as an extensive multi-period settlement (SLR No. 112). These features have now been removed with an archaeological record, but the scheduled monument remains intact.

12.57 The current visual setting of the monument includes the completed landfill site immediately to the north. Immediately to the east, west and south are the hedgerows and small copses of an agricultural landscape, with the A45 and A4071 beyond. The key further archaeological component of the setting is the continuation of the Iron Age settlement within the site. Further potentially
Contemporaneous sites include SLR No 116, a ring ditch identified from aerial photography 1.2 km to the south-west of the application site. There are further sites of unknown date believed to be Iron Age settlements surrounding the Inner Study Area. Such as an enclosure 1.2 km to the east of the Inner Study Area (SLR11), as well as two circular enclosures 200 m to the south-west of the proposed development (SLR38).

12.58 The landfill is already complete within those parts of the application site which lie adjacent to the scheduled monument. That part of the setting which lies within the site does not significantly contribute to our understanding or appreciation of it. The proposals to allow for the continuation of landfill operations would therefore have no effect on the monument.

12.59 The magnitude of impact of the proposed development upon the monument is predicted to be nil and the significance of indirect effect nil.

12.60 The seven grade II listed buildings within Outer Study Area are all agricultural buildings and structures, and are assets of high heritage significance. Of these, Listed Building 1034905 lies beyond the ZTV of the proposed development (Drawing LH 12/2), and will therefore receive no impacts from it. The immediate setting of the remaining six farmhouses (Listing Numbers 1185647, 1034876, 1365090, 1034881, 1390996 and 1299648) is in each case that the surrounding infrastructure of the farm, with a wider setting including their associated fields. The existing setting of these heritage assets includes the current landfill operation and restored areas, though at a distance. For the two nearest assets, 1365090 (Lawford Lodge Farm and Attached Barn to the north) and 1034881 (Manor Farm House and Attached Wall and Gateway, to the west) the nearest part of the application site is already occupied by restored landfill. The impact of the time extension applied for would result in an increase of the duration of the active landfill on the uncompleted areas.

12.61 The magnitude of impact upon these listed buildings is predicted to be effectively nil and the significance of the effect also nil.

Mitigation Measures

12.62 A programme of archaeological watching brief undertaken during any ground-breaking works involving the runway of Church Lawford would allow for the opportunity to record prior to removal any surviving archaeological remains. The programme of work would be undertaken by a professional archaeological organisation. The precise scope of the mitigation works would be negotiated with Warwickshire County Council on behalf of the applicant and the agreed mitigation programme would be documented in an agreed Written Scheme of Investigation.

12.63 No impacts significant in EIA terms upon the setting of heritage assets are identified. No mitigation for setting impacts are, therefore, recommended.

Residual Effects

12.64 The completion of the programme of archaeological works as set out above would minimise the loss of the archaeological resource that could occur as a result of the proposed development. No significant residual effects are anticipated in relation to direct impacts on cultural heritage assets from the proposed development.
Assessment of cumulative effects

12.65 There are no effects which are significant in EIA terms. There are, therefore, no significant cumulative effect.

CONCLUSIONS

12.66 This chapter presents the findings to the cultural heritage assessment undertaken as part of the EIA.

12.67 This assessment has considered data from a diverse range of sources in order to determine the presence of cultural heritage assets which may be affected by the proposed development. The potential effects on the identified assets and the potential for unknown features which could be lost have been considered. Direct effects have been identified upon unknown buried archaeology within the Inner Study Area in areas that have not previously been excavated or mitigated by archaeological programmes of work. A programme of archaeological watching brief prior to any ground-breaking activities in the area of the former runway of RAF Church Lawford is suggested in order to identify and record such remains.

12.68 There are no identified effects upon the setting of designated heritage assets within the Study Areas. No mitigation measures or assessment of residual effects are, therefore, required or assessed with regard to impacts upon setting.