

ISSUE REPORT COMMENTS

Archaeology and the historic environment

Comment No	Full Organisation Name	Chap. No	Relevant Issue No	Comment Text
4	Westbury-on-Severn PC	14.	H2.	Would like restoration of remnants of an ancient jetty (sketch provided).
28	Somerset County Council	14.		<p>A paragraph should be inserted to highlight the presence of significant sub-tidal archaeological remains. Suggested text: The area below the inter-tidal zone also contains significant archaeological remains relating to the early prehistoric landscape which once covered the whole of the present estuary before later becoming submerged by rising sea level. Many historic wrecks are known in the sub-tidal zone in addition to an uncertain number of earlier unrecorded wrecks.</p> <p>In the first paragraph a sentence should be inserted at the end as follows: The great archaeological potential of the coastal area and the nature of the threats to it is summarised in a document produced by English Heritage and RCHME 'England's Coastal Heritage' 1997.</p>

Comment No	Full Organisation Name	Chap. No	Relevant Issue No	Comment Text
29	Somerset County Council	14.	H1.	The wording of the first sentence should be changed to include mention of PPG15. Suggested text could read: The DoE's Planning Policy Guidance (PPG) notes 15 and 16 provide frameworks for historic buildings and archaeology in relation to development plans and proposals.
30	Somerset County Council	14.	H3.	The wording of the last sentence should be changed to read 'Research has been carried out on one site in the Somerset Levels funded by English Heritage'.
31	Somerset County Council	14.	H3.	Change sentence to read 'A wide scale overview on the extent of the effects of dessication, is urgently required'.
51	BMIF	14.	N7.	The BMIF would welcome further research into the implications of the pSAC designation for activities in the estuary.
66	Inland Waterways Association, London	6., 14.	T1., T4., T5., T9., T11.	There is a total lack of mention of canal restoration and a number of other inland waterways. These include Seanssea Canal, Neath and Tennant Canals and the connection at Swansea Harbour, Monmouthshire Canal restoration through Newport, Cotswold Canals and the Stroudwater Navigation, Herefordshire and Gloucestershire Canal, River Parrett, River Usk.

Comment No	Full Organisation Name	Chap. No	Relevant Issue No	Comment Text
84	Inland Waterways Association, London	14.		The industrial history of the Severn navigation has not been noted.
85	Inland Waterways Association, London	14.	H1., H4.	Should include historical features and artefacts related to the industrial heritage of the estuary.
155	Bristol City Council	14.	H4.	Avonmouth should be recognised as a uniquely important area, as set out in the local plan. Full regard should be given to the protection of this asset as set out in PPG 16.
163	Royal Commission Historical Monuments of England	14.	H - All	The archaeological issues that have been identified are the correct ones.
164	Royal Commission Historical Monuments of England	14.	H - All	The proposals that the Royal Commission has advanced (jointly with English Heritage) will seek to address these issues for England as a whole.

Comment No	Full Organisation Name	Chap. No	Relevant Issue No	Comment Text
165	Royal Commission Historical Monuments of England	14., 15.	H4., M14.	An initial evaluation is under way but it would be surprising if further recording, analysis and dissemination were not to be called for within the area covered by the Strategy. This enhanced information would contribute to wider planning and management issues, particularly those relating to landscape, tourism, sea defences and land use.
235	Country Landowners Association, Gloucestershire	14.	H4.	The hierarchy of these sites should be clearly understood.
236	Country Landowners Association, Gloucestershire	14.		Evaluation is necessary to decide whether sites need to be preserved or just recorded. There is a danger that too much protection is given for sites of little importance and clear, simple guidance is necessary.
272	British Waterways, Gloucester and River Severn	14.		BW might also be mentioned with reference to our general environmental and recreational duties under the British Waterways Act 1995, Section 22(1)b.

Comment No	Full Organisation Name	Chap. No	Relevant Issue No	Comment Text
273	British Waterways, Gloucester and River Severn	14.	H1.	Another development which poses a threat to archaeology is the Monk Meadow development.
308	The Vale of Glamorgan Council	14.		It would be useful to clarify that DoE (NH) and WO are responsible for maintaining and updating the lists of listed buildings of special architectural and historic interest. Local Planning Authorities are also responsible for listed buildings, the control of applications, grant aid (where available) and advice. (Local Conservation Officers on both sides of the estuary).
339	Youth Hostels Association	2., 14.		Environment YHA consider that a section describing the Geology of the Strategy Area should be included as the estuary has some interesting geological formations, including dinosaur footprints and spectacular cliff sections.
340	Youth Hostels Association	6., 14., 12.		A section on Education should be included. This should include interpretation of the landscape including geology and the historic environment.
369	Youth Hostels Association	12., 14.		The geology of the estuary should be described in the report - it is a fundamental constituent of the landscape, which should be identified.

Comment No	Full Organisation Name	Chap. No	Relevant Issue No	Comment Text
372	Youth Hostels Association	13., 14.		The designated geological and geomorphological sites need stronger protection.
373	Youth Hostels Association	14.		We welcome developments at Gloucester and Bristol Docks and look forward to an expansion at Cardiff Bay.
374	Youth Hostels Association	14.		Our hostel at Bristol forms part of the historical environment of the docks.
375	Youth Hostels Association	14.		The 'pills' of the Forest of Dean Coast should be restored and made available for modern boating.
376	Youth Hostels Association	14.	H6.	YHA support the protection of the historic landscape of the Severn Levels. Housing and motorway development on the Levels is opposed.
383	University of Reading	14.		The Severn Estuary Levels Research Committee is concerned to promote and coordinate geoarchaeological research on the Severn Estuary Levels (the low-lying areas of Map 2.2).

Comment No	Full Organisation Name	Chap. No	Relevant Issue No	Comment Text
384	University of Reading	14.		<p>Much reference in the Report to 'coastal defence' and 'coastal defences', but these words by themselves convey quite the right impression, because most of the engineered structures to which they refer began life as deliberate attempts to improve natural tidal marshes by enclosing them with artificial embankments in order that the land so gained could be settled and farmed on a year-round basis. The motive was wealth-creation not wealth-protection. This process of embanking has been progressive, beginning in the Roman period, with further construction during medieval and modern times. The consequence, in many parts of the area, is that the historic landscape includes a series of redundant seawalls and drainage outfalls (sluices) which, because of their once crucial role in changing the character and use of the area, are defining archaeological field monuments which should be regarded as of the utmost regional importance. Sadly, these monuments are almost without exception unrecorded and unscheduled, and consequently under grave threat from development and agricultural improvement. Many kilometres of redundant seabank and a number of historic outfalls have already been lost without proper record.</p>
385	University of Reading	14., 12.	H1., L4.	<p>Landowners and landusers need to be alerted to the existence and importance of archaeological field monuments.</p>

Comment No	Full Organisation Name	Chap. No	Relevant Issue No	Comment Text
387	University of Reading	14.	H4.	Add following section at the end of the first paragraph; 'Additionally, comprehensive surveys of the low-lying land along the estuary should be encouraged, in order to record in Sites and Monuments Records surviving redundant seabanks [seawalls?] and sluices. Appropriate examples of these critical monuments should be proposed for scheduling.'
388	University of Reading	14.	H6.	Add following section at the end of the first sentence; 'The provision of appropriate information packs could help in the location of monuments of landscape importance, such as settlement earthworks, ridge-and-furrow, gries and redundant seabanks and sluices.
435	Glamorgan/Gwent Archaeological Trust	14.	Map 14	It could be informative to indicate the extent of alluvium around the estuary (diag. incl) as these areas are proving to be archaeologically rich (organic preservation etc.).
436	Glamorgan/Gwent Archaeological Trust	14., 3.	H1., D1.	The areas of alluvium around the estuary are proving to be archaeologically rich, and are subject to threat from green field development.

Comment No	Full Organisation Name	Chap. No	Relevant Issue No	Comment Text
449	South Gloucestershire Council	14.		The importance of the archaeological potential of the alluvial deposits along the Estuary are not considered to have been adequately addressed.
473	South Gloucestershire Council	14.		Department of the Environment (National Heritage) should be replaced with Department, Transport and the Regions and Department of Culture, Media and Sport.
474	South Gloucestershire Council	14.		The "Register of Parks and Gardens of Special Historic Interest in England" which has been compiled by English Nature could be mentioned here. Also the Local Authorities role in designation of Conservation Areas could be included.
475	South Gloucestershire Council	14.		Since other sites are definitely undiscovered, the words 'it is likely' should be deleted.
476	South Gloucestershire Council	14.	H1.	This issue should be broadened to include all aspects of the historic environment i.e. structures, sites, buildings and landscapes.

Comment No	Full Organisation Name	Chap. No	Relevant Issue No	Comment Text
477	South Gloucestershire Council	14.	H1.	PPG15 Planning and the Historic Environment is also relevant.
478	South Gloucestershire Council	14.	H4.	The word 'regional' should be deleted since SMR's are held by the relevant Unitary/County Authority.
483	South Gloucestershire Council	14.		There is no real recognition that the Severn Levels are an area where historic landscapes and alluvial deposits still survive in a way which is rare elsewhere (despite references to the 'wealth of features of archaeological importance' and the 'potential for loss and disturbance of the archaeological and historic landscape resource'). Low-lying land exposed to the risk of flooding has minimised damage from agriculture and acted as a powerful incentive against development. In some historic landscapes reflecting land-use from Roman times onwards survive in a way that allows archaeological sites to be set into a landscape context. In others, including South Gloucestershire, prehistoric and Roman remains are buried under silts deposited by later flooding, and become exceptionally difficult to locate yet, when they are located, preservation is often exceptional.

Comment No	Full Organisation Name	Chap. No	Relevant Issue No	Comment Text
484	South Gloucestershire Council	14., 3.	H1., D3.	Increasing development pressure, including that resulting from the opening up of the area with the construction of the Second Severn Crossing and the exploitation of historic planning consents, makes the loss of substantial areas of this important historic landscape resource a certainty, yet there is no mechanism available to local planning authorities to require assessment of the historic landscape prior to its destruction. PPG16 allows assessment of archaeological sites threatened by development, yet this cannot be extrapolated to allow the assessment of the historic landscape over a wider area than the immediate locality of the development area.
485	South Gloucestershire Council	14., 3.	H4., D1.	There is an urgent need for research to be carried out within the other areas of the Severn Levels in order to try and protect those areas which are seen to be most important, (similar to that detailed in the last paragraph of p 149 regarding the Gwent Levels and the Somerset Levels Studies).

Comment No	Full Organisation Name	Chap. No	Relevant Issue No	Comment Text
486	South Gloucestershire Council	14.		This section fails to recognise the central role played by Local Planning Authorities in the face of increasing development pressures, and their limited ability to respond to these threats by commissioning the essential research that is required to allow proper assessment of the historic landscape and the sites within it. This means that assessment made of archaeological threats have at present to be made on the basis of inadequate information and Sites and Monuments Records. Without the means to remedy these shortcomings it is feared that large areas of this rare and unique area of historic landscape and underlying remains may be lost without being properly understood or assessed.
487	South Gloucestershire Council	14.	H - All	The threat of development to archaeological sites is noted in the report but they are seen as discrete elements within the landscape. The Severn Levels historic landscape should instead be considered as a whole, reflecting the rarity of survival of such landscapes.
488	South Gloucestershire Council	14.	H - All	The suggested ways of countering the threats to archaeology and historic environment concentrate on the better identification of discrete remains and land management. These should instead consider the need for adequate survey and assessment of the historic landscape as a whole and the development of stronger planning policies to protect this resource within the context of an area which is subject to significant development pressure.

Comment No	Full Organisation Name	Chap. No	Relevant Issue No	Comment Text
505	Individual	14.	7., 8., 9.,	<p>Siltation in the Severn greatly affected by large off-shore glacial deposits of the Ice Age.</p> <p>Glacial sedimentation has its own particular problems and characteristics because of the minute size of the particles. This affects settlement characteristics on mudflats and alluvial plain. Also pollution risks from historical times (history given). This pollution includes leachates (suggesting a historical perspective on waste tipping).</p>
658	CPRE, Avon / CPRW, Monmouthshire	14.		<p>This section refers to locally-held English Sites and Monuments Records, but does not mention 'regional' documents. Are there, in fact, two sets - one for county and the other for region? If so, where are the latter housed?</p>
660	CPRE, Avon / CPRW, Monmouthshire	14.	H1.	<p>Local plans must require that when development is permitted in archaeological heritage areas, full opportunity for appraisal and recording of features that will be lost is allowed prior to the start of work, and discoveries made during the course of demolition, excavation and construction are brought to the attention of experts in the field.</p>
661	CPRE, Avon / CPRW, Monmouthshire	14.	H2.	<p>It might be necessary to find a way of preserving the most important of these vulnerable sites.</p>

Comment No	Full Organisation Name	Chap. No	Relevant Issue No	Comment Text
662	CPRE, Avon / CPRW, Monmouthshire	14.	H6.	The last sentence provides a reason other than that associated solely with landscape why extensive tree planting should not take place on the Severn Levels.
745	The Ports Panel	14., 15.		For final framework document - suggested statement outlining the basic requirements of this chapter. "To conserve and enhance the estuary's archaeological and cultural heritage, to ensure the maintenance of its special and diverse qualities and to secure its sensitive management and promotion".
764	Individual	13., 14., 15.	N8., M17.	Who can carry out and fund smaller estuary-specific projects and tasks such as interpretation boards, conservation and archaeological projects and access improvements?
766	Individual	15., 14.	H4., M17.	Education, although mentioned under the archaeology section, it is felt that the interpretation and environmental education potential of the estuary is very great.
823	Individual	14.	H6.	Have the NFU, SELRC and the local records offices been involved? What does ICOMOS stand for?

Comment No	Full Organisation Name	Chap. No	Relevant Issue No	Comment Text
824	Individual	14.	H4.	How can the archaeological wealth of the estuary be publicised without annoying the farmers?
836	University of Reading	14.		The report correctly identifies the Gwent Levels as having a landscape of national importance, however the historic landscape and buried archaeology of large parts of the Somerset Levels are just as valuable. Current personal research (comparative study of all British Coastal Wetland Landscapes) at a qualitative level, shows confidently that the historic landscapes around the Severn are amongst the best preserved in Britain.
880	Individual	14., 13.		Has good natural history / ornithological contacts.
925	Individual	5., 14.	C5., H2.	If areas of the coastline are eroding, a watching brief would enable any archaeological material to be identified before it is lost.
960	Individual	14.		No mention anywhere of the important geological sites within the estuary (including GLR sites).