

DOWNS COMMITTEE

7th September 2009

Report of: Service Director - Environment and Leisure

Title: Clifton Camp Hill Fort

Ward: Clifton

Officer presenting report: Peter Wilkinson. Service Manager - Parks and Estates

Contact telephone number: (0117) 922 3535

RECOMMENDATION

That the proposal to hold a public consultation on the aims and options to restore the Clifton Camp Iron Age Hill Fort and Scheduled Ancient Monument is approved, with the results of the consultation and proposed implementation plan reported back to Committee in November.

Summary

The adopted Downs Management Plan includes proposals to remove trees and scrub from the Iron Age Hill Fort at Clifton Down Camp in order to restore and conserve the Scheduled Ancient Monument which English Heritage regard as 'at high risk'.

The removal of trees and scrub anywhere in the Downs has been controversial, and therefore any restoration plan for the ancient monument needs to be carefully communicated to the public in order that the aims and potential benefits are clear and understood.

The approach to restoring the iron age hillfort needs to be planned very thoroughly so that the impact on wildlife is minimised and the removal of trees does not have an adverse impact on the archaeological interests which the proposal is seeking to conserve. All the necessary consents are also required from English Heritage, Natural England and the Forestry Commission.

The significant issues in the report are:

The adopted Downs Management Plan includes proposals to remove all the scrub and manage the remaining trees growing on the iron age hillfort to reduce the risk of them being blown over in strong winds.

More detailed restoration options now need to be considered in terms of how many and which trees should be retained to ensure the ancient monument is not damaged by trees blowing over. Following consultation, the phasing and eventual outcome of the project needs to be agreed with the three national agencies (above) whose consent is required before the most significant works can proceed.

There is a level of public concern about the removal of scrub and trees on the Downs generally, which has been the subject of campaigning by Downs Watch, and more recent correspondence from concerned local residents over the plans for Clifton Down Camp.

The restoration of Clifton Down Camp provides an opportunity for creative interpretation of the Downs' ancient history, which should have significant educational benefits if planned and managed effectively in partnership with English Heritage and other key stakeholders.

Policy

1. The policy for the management of the Downs is that enshrined with the Downs Act which provides that the Downs should remain as a place for the public resort and recreation of the citizens and inhabitants of Bristol.
2. The Downs Committee has a custodial responsibility for Clifton Down Camp as a Scheduled Ancient Monument under the Ancient Monuments and Archaeological Areas Act 1979. Inclusion in the Act gives substantial protection to any monument or structure.
3. For Scheduled Ancient Monuments specific consent from the Secretary of State for Culture, Media and Sport is required for any works:

resulting in the demolition or destruction of the monument or any damage to it;

or, for the purpose of removing or repairing the monument or any part of it making any alterations or additions to it;

or any flooding or tipping operations on the land on which the monument stands.

It is an offence under s.28(1) of the 1979 Act to damage or destroy the monument.

Consultation

Internal

Richard Ennion: (Natural Environment Manager):

The SAM is within the boundary of a Site of Special Scientific Interest and is also a Site of Nature Conservation Importance. The SAM is contiguous with a Special Area of Conservation but is not actually included within it. Scrub removal would not require consent from the Forestry Commission. However, removal of trees amounting to more than 5 m³ would require a felling licence. The Forestry Commission may require an Environmental Impact Assessment if the felling licence sought to permanently remove woodland, this because deforestation was being proposed within a SSSI. The Forestry Commission would clarify whether an EIA was required in consultation with Natural England. A survey of the flora and fauna associated with the site will be required. Confirmation should be sought as to whether any species are present that are described in the 'description and reasons for Notification' [of the Avon Gorge SSSI]. A badger survey will be required. A bat survey will need to be conducted over a number of months to confirm or not the use of this area for bats and to evaluate the impacts of management options. Impact of proposed works on bat species should be evaluated in compliance with the Habitat Regulations (impact on European Protected Species). It is assumed that works could be timed to avoid harm to nesting birds. Given the complex regulatory environment and the number of agencies needing to be involved, it is suggested that an early meeting be held between the Forestry Commission, Natural England and English Heritage.

Peter Insole: (BCC Archaeology Service):

Clifton Down camp is an Iron Age promontory fort, forming part of a group of three such forts, with the other two, Stokeleigh and Burwalls, on the opposite side of the Avon Gorge. It has been suggested that the location of these sites relative to one another hints that the River Avon may have been a boundary between two groups of Dobunni, the local Celtic tribe.

There has not been any recent fieldwork within the camp but earlier fieldwork suggested Roman re-occupation of the camp. A reservoir appears to have been excavated within the camp in 1845, to the

north of the Observatory (Russell, 2003), while other parts of the camp appear to have been affected by quarrying.

Despite these more recent uses the form of the monument remains decipherable particularly on the north and east sides. Therefore, removal of the vegetation across the area of the camp in association with an appropriate interpretation strategy will enable a wider appreciation and understanding of the monument.

The camp has been depicted in several illustrations from the eighteenth and nineteenth century, most notably those by Samuel Hieronymus Grimm (1788-9), that suggest that until relatively recently the area was open and largely free of vegetation (See Appendix C)

External

4. Rob Iles (English Heritage): Meeting held with EH who are supportive of the proposals having commented as such on the draft Management Plan, and pleased to be a partner in the proposed consultation.

Context

As part of the public consultation on the draft Downs Management Plan, the public and stakeholder groups were asked for their views on the proposals to open up areas which had become scrub/secondary woodland over the past 50 years (or more recently) and remove areas of trees which had grown up to obscure important historic views. Draft proposals to restore the iron age hillfort at Clifton Down Camp were also part of this wider consultation and debate.

As a result of the consultation and following discussions with Natural England and English Heritage, the Downs Committee adopted the Management Plan in 2007 to include the following actions:-

7.3.3: Remove all scrub growing within the boundary of the scheduled ancient monument known as Clifton Down Camp, an Iron Age Hillfort;

7.3.4: Check the condition of all trees growing within the Iron Age Hillfort annually and maintain them to reduce the risk of them ever being blown over in strong winds.

Following adoption of the Management Plan, the Downs Committee made a site visit to Clifton Down Camp in July 2008 and reaffirmed their view that this proposal should be taken forward. However due to staff capacity issues and changes with the review of the parks service - and the need to plan the project with care - it was agreed that further planning and consultation would be deferred to 2009.

Over the past 6 months, there has been a small amount of background correspondence from Downs Watch and some local residents expressing concerns over the plans to remove scrub and trees from the hillfort. The issues raised by this correspondence need to be addressed in planning the consultation this autumn.

Proposal

5. It is proposed that a public consultation exercise is undertaken in mid/late October (final dates tbc) to enable the aims and options for the restoration of Clifton Downs Camp to be explained and public and stakeholder views sought. It is hoped that this will be presented as a joint consultation by the Downs Committee, Bristol City Council Archaeology Section and English Heritage. Possibly also involving Natural England.
6. The detailed plans for the consultation have yet to be finalised, but it will be based on a series of 'drop in' sessions in a community hall, marquee or portacabin located close to the site , plus guided walks and questionnaires for feedback.
7. Subject to time constraints and availability, it is hoped that the involvement of expert archaeologists/graphic designers can be secured to support the consultation, and enable creative interpretation of the restoration plans - such as a mini time team or use of computer generated 'visualisation techniques'. A balance of course needs to be struck between the scale of the project and the cost of the consultation exercise.
8. It is hoped that the proposals can be presented graphically alongside the restoration plans for Stoke Leigh Camp, another iron age hillfort on the other side of the gorge where the National Trust have undertaken restoration work and propose grazing the site with cattle.
9. The options to present at the consultation generally relate to whether there is general support for the restoration of the hillfort to proceed, or not. Beyond this there are very few choices over how the work is undertaken on the ground and over what timescale - however if there are genuine choices these will be tested during the consultation.

10. As the hillfort falls within a Site of Special Scientific Interest as well as being protected as an ancient monument, any large scale scrub and tree removal will require consents from English Nature and English Heritage. A felling licence will also be required from the Forestry Commission.
11. Should the Downs Committee decide to proceed with the proposals, only limited scrub removal is likely early in the New Year 2010, with further works probably scheduled over the following 2 to 3 years. This approach enables the community to get used to the works being undertaken, helps avoid the risk of 'windblow' following clearances and importantly allows a sward to develop on the hillfort to mitigate the risk of erosion on such a sensitive site. The ecology of the restored downland should be interesting and needs monitoring.

Other Options Considered

12. The Downs Committee has the option to proceed with the restoration proposals without engaging the public, however this would not be true to the principles under which the committee and council seeks to work. No communications and consultation would lead to high levels of complaint and risk the project not going ahead.

Risk Assessment

13. A risk assessment has been completed for this project and a summary of the major risks is detailed below.
14. The main risks of not agreeing to this course of action are as follows:-

That the hillfort remains on the 'at risk' register of English Heritage and the Downs Committee does not deliver against its obligations for the ancient monument.

15. The main risks of agreeing to this course of action are as follows:-

There is a risk that the public will object strongly to the restoration of the hillfort, which impacts on the reputation of the Downs Committee and ultimately leads to members deciding not to proceed with the restoration plans. This will represent a waste of the committee's resources used for the consultation.

16. The action taken to mitigate these risks is:-

This risk is mitigated by strong communications explaining the rationale behind the proposals and the benefits to the community and environment of restoring the hillfort as a largely open downland earthwork - an even more stunning setting for the Observatory. The statutory responsibilities of the Downs Committee can be fully explained to demonstrate a long term and responsible custodial role is being taken.

Equalities Impact Assessment

17. No Equalities Impact Assessment is proposed for this consultation exercise.

Legal and Resource Implications:

Legal

The Clifton and Durdham Downs (Bristol) Act 1861 provides that the Downs should remain as a place for the public resort and recreation of the citizens and inhabitants of Bristol, and that a committee should be appointed to manage them. The recommendations of this report are within the powers conferred by this statute.

The Ancient Monuments and Archaeological Areas Act 1979

Part 1 of the Act provides for protection of ancient monuments by way of their entry on a schedule maintained by the Secretary of State. Once a monument is scheduled any works to it require written consent of the Secretary of State, which can be granted either unconditionally or subject to conditions. Such consent can be modified or revoked subsequently.

The Wildlife and Countryside Act 1981

Section 28E of this Act prohibits the owner or occupier of a site of special scientific interest from carrying out works to this without the written consent of Natural England, which may be subject to conditions and for a limited period. Such consent can subsequently be withdrawn or modified. Natural England must give reasons for any refusal, conditions, time limit, or withdrawal or modification, and there are rights of appeal.

The Forestry Act 1967

Section 9 of this Act requires a licence granted by the Forestry Commissioners for the felling of growing trees subject to various exceptions relating to such matters and diameter, and topping and lopping.

Legal advice given by: Frances Horner, Senior Solicitor

Financial

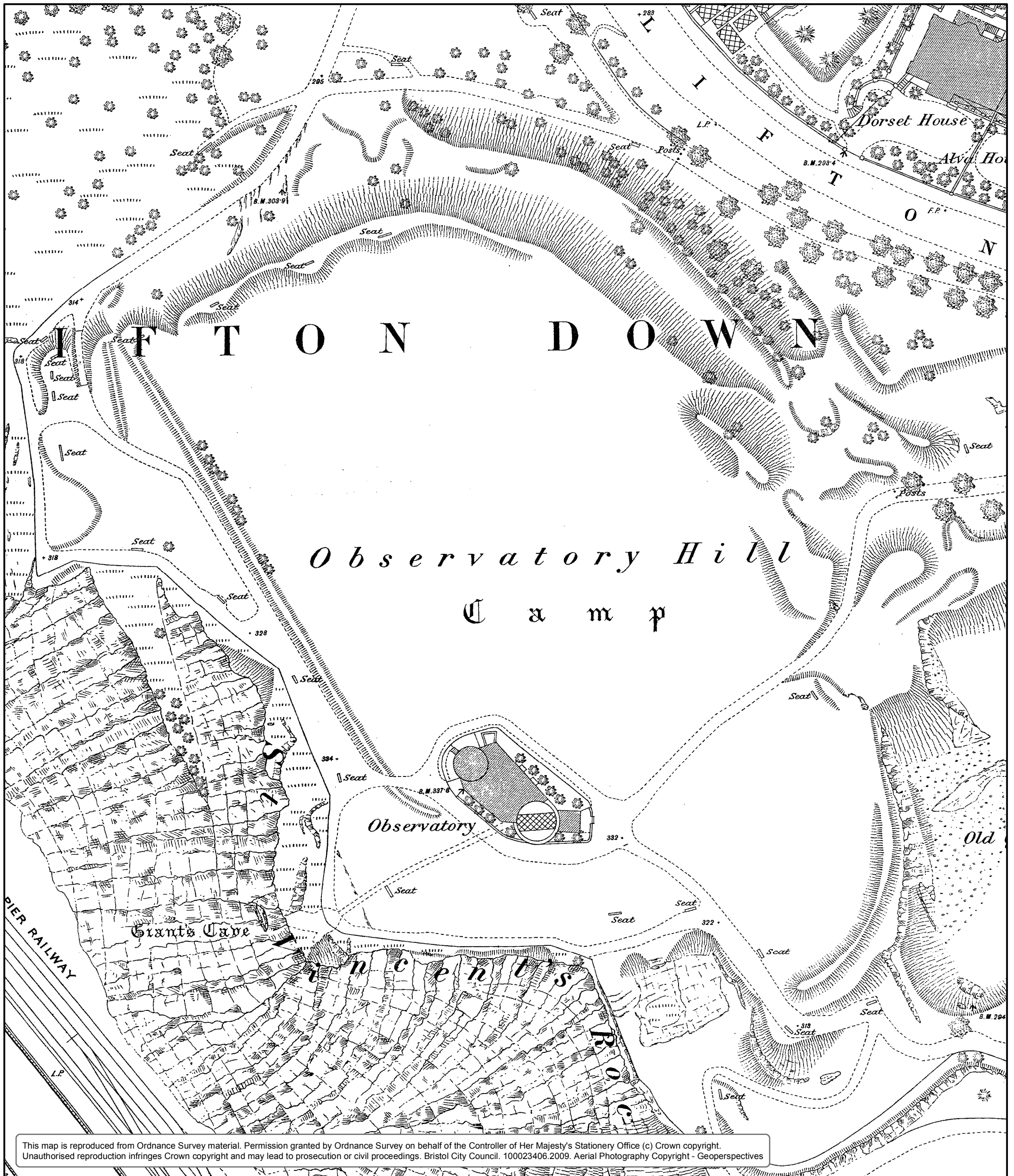
Revenue The costs of the consultation exercise are estimated to be up to £5,000.

Financial advice given by: Tony Whitlock, Senior Accountant

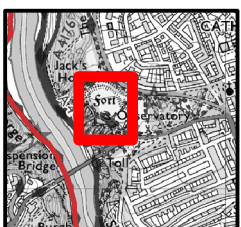
Land The hillfort is on land owned by the Merchant Venturers and managed by the Downs Committee.

Appendices: Appendix A - Clifton Downs Camp historic map
Appendix B - Clifton Downs Camp - aerial photo
Appendix C - Illustrations by Samuel Hieronymus Grimm (1788- 9)

ACCESS TO INFORMATION Background Papers



Bristol Parks and Estates



Clifton Down Camp
Iron Age Hillfort
11th August 2009

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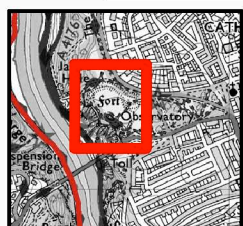
Neighbourhoods



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Neighbourhoods



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Appendix (8) C

Appendix C: Downs Committee on 7th September
Clifton Down Camp: Illustrations by Samuel Hieronymus Grimm (1788-9)



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