
Statement Heritage

Land at Castle Rag House, Goonvrea Road, St Agnes: Setting Assessment

Heritage Impact Assessment: SH Ref CRAG0418

24/04/2018



Figure 1: The summit of St Agnes Beacon. A Bronze Age Bowl Barrow reused as a 18th-19th century signal station and prospect mount.

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This project was commissioned by Simon Winn and carried out by Daniel Ratcliffe BA MA MCI(A) in April of 2018

The views and recommendations expressed in this report are those of Statement Heritage and are presented in good faith on the basis of professional judgement and on information currently available. It should not be used or relied upon in connection with any other project than that intended.

Non Technical Summary

Our client initially commissioned us to assess the impacts of development at Castle Rag House, Goonvrea Road, St Agnes prior to the commissioning of and to inform architect's designs. Development is proposed of a single residential dwelling within the current garden of the property.

This assessment presents the result of analytical assessment of the setting of the Bolster Bank Scheduled Monument, part of which lies 25m from the proposed development, and of any impacts on the Cornwall and West Devon Mining World Heritage Site, the development lying within Area A7 of that designation.

The initial assessment modelled the development of a two storey detached dwelling of similar mass to the existing properties to the north of site and concluded that the development would cause no more than negligible less than substantial harm to the setting of the Scheduled Monument and will cause no appreciable harm to the integrity or authenticity of attributes of Outstanding Universal Value constituting the significance of the World Heritage Site.

Detailed designs have now been provided by Mike Bradbury Design (their ref 1939 May 2018) These show a building modelled on the massing of Castle Rag House, with 't' shaped plan form not exceeding the elevational height or width of the older building. The proportions and detailing of the proposed development are in our opinion considerably less impactful than those submitted during previous pre-application discussions, avoiding the overlarge asymmetric gable presented to the western elevation and the prominent glazed balcony and light rendered wing gable that would have presented themselves at first floor level to the south. The building is proposed to be finished, as we had recommended, with recessive natural materials. As such we are confident in our initial assessment that the development can be delivered without harm to the historic environment.

Table of Contents

Non Technical Summary.....	2
1. Introduction and Methods	4
2. Summary of Relevant Policy and Guidance used in this assessment.....	7
3. Description of Site and Characteristics of Proposal.....	10
4. Setting Assessment	14
4.1 Step 1: Heritage Assets to be assessed.....	14
4.2 Step 2: Assessing the contribution of the settings of the heritage assets	17
4.3 Step 3: Assessing the impact of the proposal on heritage assets and their settings.	31
4.4 Step 4: Maximising enhancement and minimising harm	33
4.5 Step 4: Recording decisions and monitoring outcomes.	34
5. Conclusions.	34
6. References.....	35
7. Archive	37

1. Introduction and Methods

- 2.1 This report has been commissioned by Simon Winn, in response to pre-application advice that a proposed application to build one house within an existing residential curtilage at Castle Rag House, Goonvrea Rd, St Agnes, Cornwall, requires Heritage Impact Assessment. The Historic Environment Advisor's comments were as follows:

'We have consulted the Cornwall & Isles of Scilly Historic Environment Record. We note that the proposal site lies within the St Agnes Mining District, Area A7 of the Cornwall and West Devon Mining Landscape World Heritage Site, and is less than 25m north of the Bolster Bank, a Scheduled Monument (NHLE 1016444) and therefore a heritage asset of recognised National Importance.

We therefore advise that the full application will need to be supported by a Heritage Statement. This Heritage Statement should comprise two parts: a Statement of Significance that identifies the heritage assets affected, including their settings, and assesses the heritage significance of the identified assets and their settings, sensitivities, and capacity for change; and a Heritage Impact Assessment that summarises the proposals, assesses likely impacts on significance and setting, and identifies any harm, and, where necessary, provides a Mitigation Strategy. This Heritage Statement should be carried out by a suitably qualified organisation or individual in accordance with accepted national guidelines. This is in accordance with the provisions of NPPF Section 12, paragraph 128 and Cornwall Local Plan policy 24. It is worth noting that the Council's Historic Environment team were not consulted as part of this pre application enquiry and therefore they have not assessed the impact of the proposal on the setting of the scheduled ancient monument. Therefore this assessment will not be carried out until an application is submitted and therefore the extent of their thoughts on this matter remain unknown at this time and the Council reserve full judgement on this aspect of the assessment for future determination.'

- 2.2 The report responds to requirements in the NPPF (P128) (DCLG 2012) and Cornwall Local Plan (Policy 24) (CC 2016) to ensure that all applications for development are based on a proportionate assessment of the significance of any heritage assets affected, including any contribution made by their setting. It also takes notes of the guidance set out in the Cornwall and West Devon Mining World Heritage Site adopted SPD (Cornwall Council 2017) .

- 2.3 Desk based research and analysis has involved:

- Consultation of the Cornwall and Scilly Historic Environment Record and National Heritage List for England for the details of designated and undesignated sites.
- A review of existing research on the 'Bolster Bank' Scheduled Monument
- Analysis of LiDAR data to establish the Zone of Theoretical Visibility of both the Bolster Bank and the proposed development.

- Consultation of historic Ordnance Survey and Tithe mapping / apportionment to consider historic land use.

2.4 Fieldwork was undertaken on 23/04/2018 in cloudy but clear conditions. This fieldwork:

- Field testing of the predictions of Digital Elevation Mapping based viewshed analysis. Models were produced using the QGIS viewshed plugin documented at <https://plugins.qgis.org/plugins/ViewshedAnalysis/> using DTM data from the BGS TELLUS survey (Ferraccioli 2013) which has an average resolution of 1m horizontal and 0.25m vertically. Observer height was assumed to be 1.5m and the models have been corrected for earth curvature effects (English Heritage 2010).
- Recorded the principal setting of the Bolster Bank and St Agnes Beacon using photography
- Recorded and considered the current condition and impact of the existing site.

2.5 Following field work and desk based research an initial recommendation report was produced (24/05/2018) in advance of detailed redesign of earlier proposals, with particular note taken of the guidance presented in Historic England's GPA3 (The Setting of Heritage Assets) and Cornwall Council's Supplementary Planning Document for the Cornish Mining World Heritage Site.

2.6 Following development of architects plans by Mike Bradbury Design, we have redrafted our recommendation report to comment on the impact of the designed scheme in this report, intended for submission to the LPA.

2.7 Recent case law has developed a principle that ‘less than substantial harm’ (the threshold identified by NPPF P134) does not necessarily amount to a less than substantial objection to the grant of planning permission (Barnwell Judgement [2014] EWCA Civ 137 p29). In such cases it is incumbent on decision makers to ensure an informed balancing exercise is carried out, taking account of the public benefits of the proposal, the degree of harm and the statutory and policy weight to be accorded to designated assets. Assessing the degree of harm to a heritage asset typically involves a balance between different heritage values and a degree of professional judgement is always involved. To ensure that the judgements given in this report are as clear as possible the assessment uses the following definitions to develop a four step grading of harm.

Substantial Harm	The change seriously affects a key element contributing to the significance of the asset, going to the heart of its significance
Moderate Less than Substantial Harm	A major element of the heritage value of the asset or its setting is harmed, whilst enough value is retained to continue to justify identification as a heritage asset
Minor Less than Substantial Harm	Some heritage values are harmed but these do not constitute a major element of the significance or its asset, and / or the change is offset by enhancement or revelation of other heritage values
Negligible Less than Substantial Harm	Minor negative harm to the heritage values of a place that are neither substantive or primary to its overall significance

2. Summary of Relevant Policy and Guidance used in this assessment.

2.1 **The National Planning Policy Framework (2012)** states that the “[conservation of] heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations” is a core principle of the planning system”.

2.2 NPPF policies particularly relevant to this case are

128. 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.

129. 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 of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.

131. In determining planning applications, local planning authorities should take account of:

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation*
- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality*
- *the desirability of new development making a positive contribution to local character and distinctiveness*

132. 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. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets

of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

134. 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 securing its optimum viable use.

135. 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 affect directly or indirectly 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.

137. 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 or better reveal the significance of the asset should be treated favourably.

138. Not all elements of a World Heritage Site or Conservation Area 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 133 or less than substantial harm under paragraph 134, 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.

139. Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

141. Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also 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 accessible². However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

- 2.3 The **Cornwall Local Plan** also places considerable planning weight on the conservation of the historic environment and of local character and distinctiveness. Policy 24 carries over the essential principles of NPPF Policy 24 and takes a positive approach to proposals which “*sustain the cultural distinctiveness and significance of Cornwall’s historic rural, urban and coastal environment by protecting, conserving and*

where appropriate enhancing the significance of designated and non-designated assets and their settings.”

3 Description of Site and Characteristics of Proposal

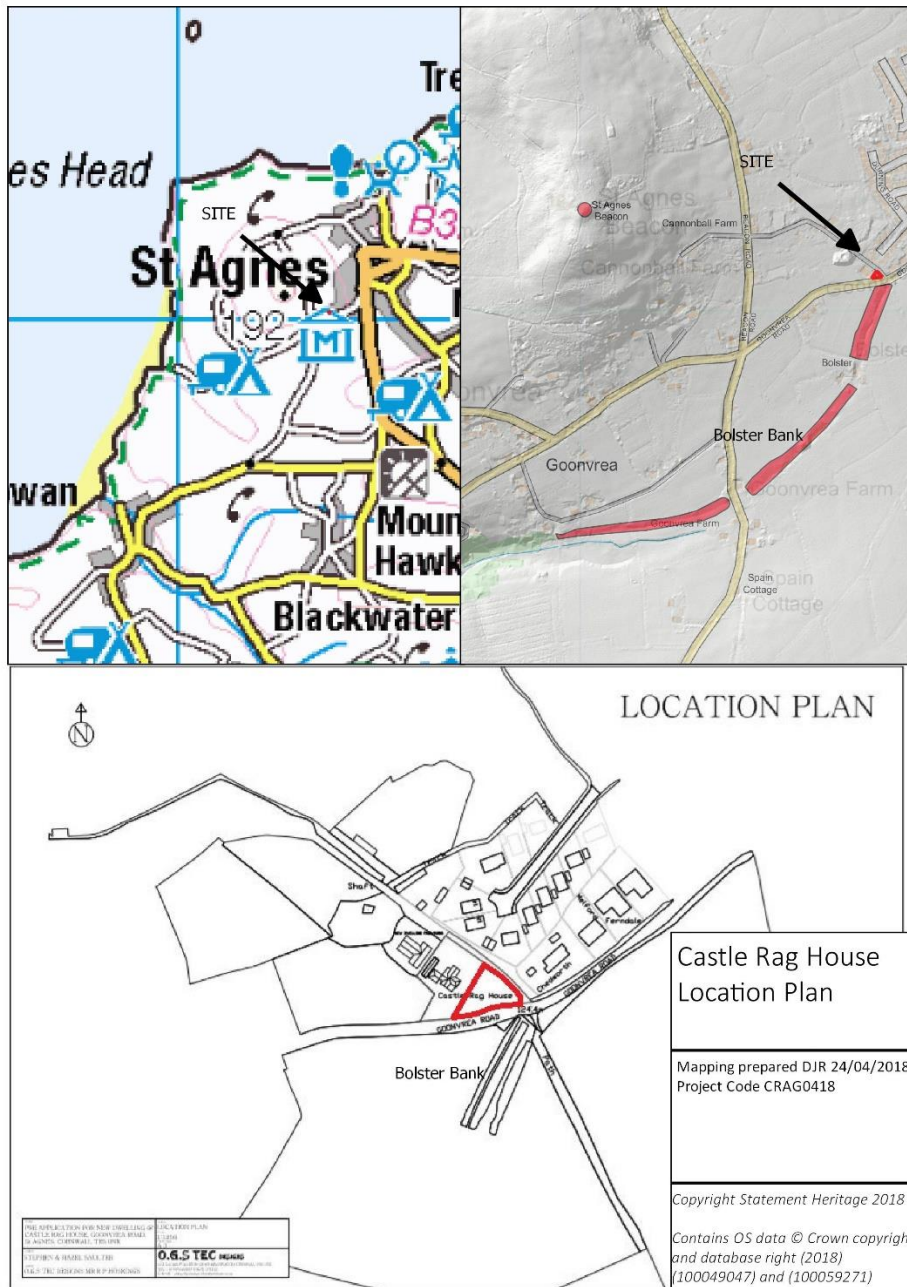


Figure 2: Location Plan

- 3.1 Development is proposed within a subdivision of the current residential curtilage of 'Castle Rag House' (figure 1) – the site being centred at SW7163350078.
- 3.2 The site is underlain by mudstone and sandstones of the Porthtowan Formation (BGS 2018) at the foot of St Agnes Beacon, a prominent hill rising from the North Cornwall plateaux. Bristow suggests that the Beacon may have originated as either an island at a time of higher sea levels in the Miocene or Pliocene epochs or as an 'inselberg' (1999, 126).
- 3.3 The site lies at a well defined boundary between 'Anciently Enclosed: Medieval Farmland' and 'Recently Enclosed: Post Medieval Enclosed Land' as defined by the Cornwall Historic Landscape Characterisation project (Herring, 1998). This boundary corresponds roughly to the route of the Bolster Bank scheduled monument with a well defined smallholder landscape constituting much of the 'Recently Enclosed' component.
- 3.4 CC published online HLC data (2018) shows the proposed development site lying at just within 'Recently Enclosed Landscape' immediately adjacent to the '20th Century Settlement' zone representing the modern extent of St Agnes. It is clear from our analysis (following) that despite the 1990s characterisation the current character of the site is that of 20th century settlement.
- 3.5 Figure 3 shows the current appearance of the proposed development site. The site will be formed from the subdivision of the plot of Castle Rag House, which was built in the late 1990s following the demolition of a mid 20th century bungalow (LPA ref) C1/PA25/0105/97/N).
- 3.6 Castle Rag House is a large 2 storey detached property (fig 3i) standing in a large triangular garden curtilage in which are 2 greenhouses (fig 3iii) a number of outbuildings, a small pond and a rockery/shubbery formed from demolition rubble (fig 2ii) from a concrete garage (owner *pers. comm.*) An approximately 1m modern Cornish hedge topped by a further 1m of mature, dense, evergreen hedge forms the southern boundary (3iv,v,vi). The house, and proposed development are accessed via a unmetalled track to the north east leading to Cannonball Farm.
- 3.7 Development is proposed of a 2 storey traditionally detailed detached dwelling. The pre-application submission to Cornwall Council (PA17/02077/PREAPP) has been subject to further design work following initial advice from the LPA and from Statement Heritage. Impact comments within this report are based on the issue of drawings from Mike Bradbury Design (Appendix 1) received by Statement Heritage on 23/05/2018.

i) Castle Rag House from south
[001]



ii) Looking south across site (red line indicates approximate boundary)



iii) bottom right: Looking SW across site (boundary will be red line, new development approximately to the left hand side of this line)



Castle Rag House
Figure 3
Proposal site

Photos prepared DJR 24/04/2018
Project Code CRAG0418

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(100049047) and (100059271)

iv) Southern boundary of site (from site). Modern Cornish Hedge with evergreen hedge



v) Looking west along Goonvrea Rd. Castle Rag House and site to right. Eastern terminal of Bolster Bank is to the left of shot behind the vegetation.



vi) bottom right: Looking E along Goonvrea Rd. Hedge and wall to the left of shot is the southern boundary of site.



Castle Rag House Figure 3 (continued) Proposal site
Photos prepared DJR 24/04/2018 Project Code CRAG0418
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4. Setting Assessment

4.1 Step 1: Heritage Assets to be assessed.

- 4.1.1 Step 1 of Historic England's setting assessment advises that the assets of which the setting may be impacted by a development are identified.
- 4.1.2 The NPPF defines the setting of a heritage asset as 'the surroundings in which [it] is experienced'.
- 4.1.3 As such it is important to consider both the extent of impact which a proposed development may have on its surroundings, and the surroundings of nearby heritage assets which may contribute to their setting.
- 4.1.4 In order to understand the potential 'Zone of Visual Influence' (ZTV) of the proposed development we have mapped the areas from which a building of nominal 7m ridge height *may* (assuming a 'bare earth' or Digital Terrain Model' [DTM]) be visible. This is presented in figure 4. It is very important to appreciate that this model, which is based on a DTM derived from LIDAR data (Ferracoli 2013) assumes a landscape from which all buildings and vegetation has been removed, leaving only the 'bare earth' surface. In reality such visualisations should be seen as an aid to traditional fieldwork (English Heritage 2010).
- 4.1.5 The viewshed indicates that two Scheduled Monuments lie within the viewshed of the proposed development NHLE 1016444 'Bolster Bank' which is considered within the Statutory Description a 'Cross Dyke'; and NHLE 1016443 'Bowl barrow on St Agnes Beacon 350m west of Cannonball Farm'.
- 4.1.6 Site visits made to test these predicted visual relationships confirmed the co-visibility of the development site with these monuments.
- 4.1.7 Much of the land north of Goonvrea Road, including the proposed development site is included within Area A7 of the Cornwall and West Devon Mining Landscape World Heritage Site. Site testing demonstrated that the ZTV's prediction that any visibility of the development site from within Area 7 is restricted to the south-eastern slopes of St Agnes Beacon and the slopes to its foot is reliable. As such the impacts of the proposed development on the Outstanding Universal Value of heritage assets within this area have been included within the scope of this assessment.
- 4.1.8 The viewshed also predicts inter-visibility between the development site and a large number of Listed Buildings. In reality field testing confirmed that, as expected, the vast majority of these buildings lie within the urban extent of St Agnes, their settings directly constrained by their surrounding urban development. As such these assets have been discounted from further assessment.
- 4.1.9 Whilst there are three Bronze Age Barrows atop St Agnes Beacon (MCO4582; MCO4584 and NHLE1016443) only the southern most scheduled example is designated and features directly in views in which the proposed development would constitute a very minor element well removed from

the skyline position which forms such an important component of its setting. Consequently it is deemed reasonable not to assess the setting of these assets further, although they are referred to briefly below in a discussion of the setting of the Bolster Bank.

- 4.1.10 The site of the development lies 25m from the Bolster Bank Scheduled Monument. As such it is reasonable and proportionate to consider the effect of the development on its setting and on the archaeological potential of the site in which it will stand.

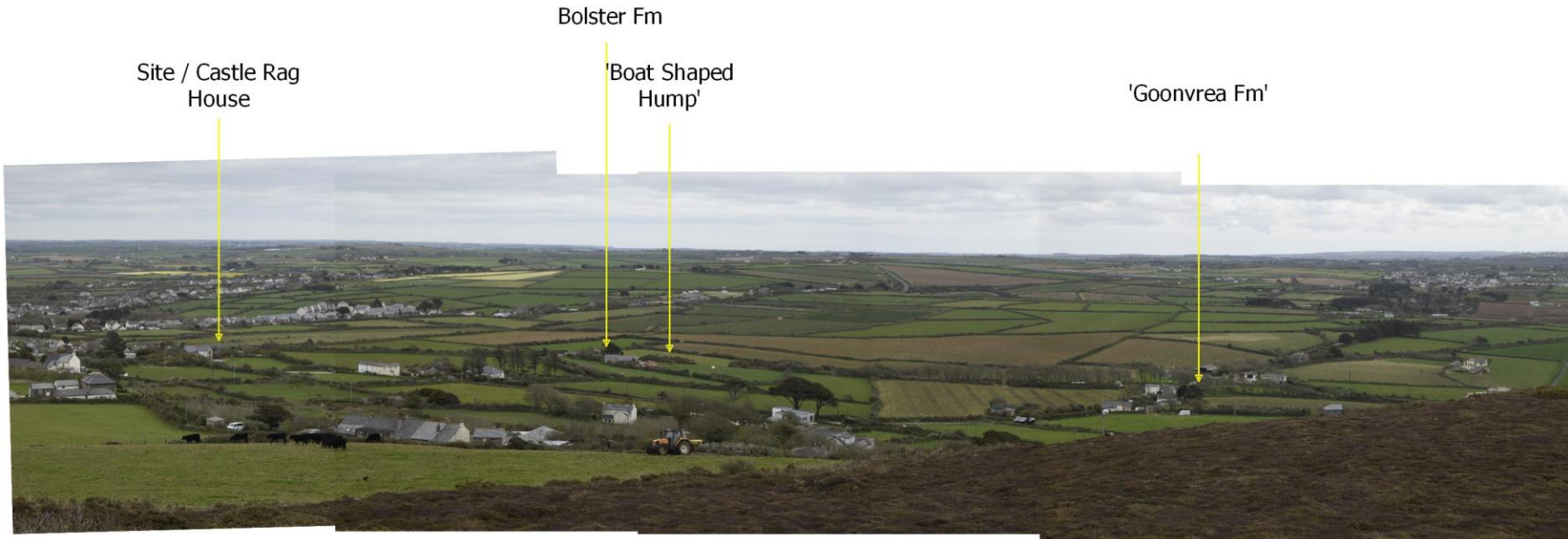
4.2 Step 2: Assessing the contribution of the settings of the heritage assets contribute to their significance

- 4.2.1 Step 2 of Historic England’s setting assessment requires that the settings of the heritage assets affected are defined and understood.
- 4.2.2 Scheduled Monuments are archaeological sites, monuments and uninhabited buildings of ‘historic, archaeological, artistic and traditional interest’ selected by the Secretary of State DCMS for their ‘national importance’ and closely managed by Historic England on the government’s behalf. As such Scheduled Monuments benefit from the highest level of statutory protection afforded to heritage assets by Parliament and by the English planning system. NPPF P132 states that their conservation should be accorded ‘great weight’ in planning decisions with ‘substantial harm’ (to either the asset itself or by harm to its setting) being ‘wholly exceptional’.

Description: Bolster Bank

- 4.2.3 **Scheduled Monument (NHLE 1016444) ‘Bolster Bank’** (figure 5, figure 6) is described by Historic England as a ‘substantial univallate earthwork, the centre section of which survives particularly well’ (Scheduling Description). The general original form of the monument appears to have been a northern bank (now surviving up to a maximum of 3.4m) and southern ditch (now mostly silted and only surviving to 0.7m depth) built to enclose the St Agnes coastal headland, including the Beacon hill (Historic England Scheduling Description). Figure 5 has been prepared using hill-shaded LiDAR data to demonstrate how the surviving monument begins at the head of Chapel Porth Coombe, which would have provided a naturally defensible barrier to the west, and gradually increases in scale as the topography becomes more level before its current abrupt termination at ‘Cannonball Turning’ opposite the proposed development site. From this point the route of the monument is lost beneath urban St Agnes but it seems very likely that the work continued to meet the upper reaches of Trevaunce Coombe, the main valley leading down to the sea here. A number of breaches in the earthwork are noted and include small breaches made, ostensibly for field access purposes, with more significant breaches at Goonvrea Farm (MCO14580) and Bolster Farm (MCO13478), both of which are probably of early medieval foundation.

i) (right) Looking South from St Agnes Beacon Hill (just in front of the Beacon Mound)



ii) (below) Looking north from public footpath



Castle Rag House
Figure 6
Bolster Bank Montages
(individual photos 50mm f/l)

Photos prepared DJR 24/04/2018
Project Code CRAG0418

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- 4.2.4 The monument's name is shared with the folkloric giant 'Bolster'. An early written **account** of the folk-tale is given by Tonkin (1811). Tonkin's telling has a number of features of interest here, in narrating much of the landscape still visible today. Tonkin notes the folk tale records Bolster as requiring St Agnes to clear the stones from the tenement of Bolster and carry them up to the top of the Beacon in her apron in three loads, depositing them to form the three barrows which crown its summit. An alternate version of the story is recounted by Hunt (1865). In Hunt's version it is Bolster's put-upon wife who is required to deposit the stones, whilst Bolster becomes utterly infatuated with St Agnes, pestering her relentlessly, until she tricks him into demonstrating his love by filling a hole in the cliffs at the base of the valley of Chapel Porth Coombe with his blood, a task which the conceited and simple giant thinks easy. Of course St Agnes knows that the hole leads to the sea, Bolster bleeding to death, staining the rocks here red as they remain today.
- 4.2.5 The most recent detailed technical consideration of the monument, which the Scheduling description draws on heavily, is based on research and field survey by Nicholas Johnson for the 'Cornwall Committee for Rescue Archaeology' published in *Cornish Archaeology* (1980). Johnson's report describes the then condition of the monument (which accords closely to that observable today), and considers the documentary evidence for the monument as well as considering the potential course of the monument prior to the urban growth of St Agnes.
- 4.2.6 Johnson ascribes the etymology of the name *Bolster* as deriving from *Bothlester*, recorded in association with the Bolster tenement (land around Bolster Farm) in the 14th and 15th centuries. This in turn derives from the Cornish words *both* (lump) and *lester* (boat) from which can be derived 'boat shaped lump' (1980, 79). Johnson notes that this may derive from a small section of the bank to the immediate west of Bolster Farm which has been truncated at each end, leaving a section which looks very much like an upturned hull (see Fig 6ii).
- 4.2.7 This would imply that the damage to the bank at this point was already well progressed by the late mediaeval period, which would account also for the siting of the Bolster and Goonvrea farmsteads directly on the route of the monument and the extents of both the Bolster and Goonvrea tenements with their fields to both sides of it. If this were so it would indicate that any tenurial boundary defined by the bank had been superseded by the 14th century.
- 4.2.8 Johnson also refers to 17th and 18th century tin bounds (documents recording the location of tin working licences) mentioning 'The Great Bank', and that it was also known in the 18th century as the *Kleth* or *Cleath* – a Cornish word meaning 'dyke' (ibid).
- 4.2.9 Johnson's account concludes with a consideration of the date of the monument, which continues to be that drawn upon by Historic England. A later Iron Age or Roman date is not entirely ruled out, and a number of Roman coins and a hoard are recorded on the Beacon, although it is notable that the scale of the monument is considerable. The extant section of the monument consists of a substantial bank and ditch of a length around twice that of the largest known Iron Age cliff castle at the Dodman near Gorran Haven.
- 4.2.10 Alternately Johnson notes that the monument may well fit into the tradition of a number of monuments generally assumed to be of early medieval date elsewhere in the UK (Offa's Dyke, Devil's

and Dane's Dykes etc, rarely themselves closely dated) an observation shared by Todd (1987,259). The closest to this class of monument he identifies in Cornwall is the 'Giant's Hedge' (MCO 23462 / NHLE 1006681) which runs from Lerryn to Lanreath, enclosing a substantial area of the south coast, like the Bolster making use of two natural creeks at either end. HER record MCO 23462 notes of the Giant's Hedge that "only Bolster Bank is of comparable structure... may represent the northern bank of a particular small tribal kingdom... or even a literal last stand against the Saxon invasions of the 9th and 10th centuries".

- 4.2.11 Our own desk-based research notes that other comparable early medieval monuments either lost or surviving in a fragmentary fashion may have included a "Greteditche" (approximate location SX08576791) which acted as the meeting place of courts held in Bodmin in the mid 16th century and reputedly divided Cardinham Manors moors from the Priory of Bodmin's fields at Callywith (MCO22997) and the 'Giant's Grave' at Ludgvan (MCO27104 / SW50673217) which Pete Herring has suggested may be 'comparable with Bolster Bank and Giant's Hedge' and acted as part of a coast to coast defensive line enclosing the entire Penwith Peninsula (note within HER record).
- 4.2.12 Archaeological recording of an unauthorised breach in the bank at SX71424966 to the north east of Goonvrea Farm revealed that the bank consists of four stratigraphic levels, with no obvious phases of rebuilding and identified the 'availability of preserved ground beneath the bank which would be suitable for paleoenvironmental sampling in the future, although no sampling was undertaken and no datable material recovered in the observation (Cole, 2004).
- 4.2.13 Regardless of its precise date it is likely that the Bolster Bank acted as a very significant land boundary, demarcating the coastal land around Beacon Hill. Its scale is such that very considerable labour resources were required to undertake its construction.

Significance (Bolster Bank)

- 4.2.14 **Historically** the Bolster Bank monument's significance may relate to the consolidation of kingdoms that took place over the course of the early medieval period, whilst in the medieval and post medieval period the monument provides landscape context to a number of historic tin bounds. The monument illustrates the power of landowners (or perhaps communities) to mobilise substantial labour resources in the division and / or defence of land. It may also illustrate the growing importance, and appreciation of, tin resources in the early medieval period. The Scheduling description notes that *'The Bolster Bank is a substantial univallate earthwork the central section of which survives particularly well. Lengthy linear earthworks of this kind are known elsewhere in England but the Bolster Bank is unusual in that it defends or demarcates a headland area rather than a spur or ridge, as is more common with cross dykes.'*
- 4.2.15 **Archaeologically** Historic England note that *'The monument, the original length of which may be considered exceptional, will retain archaeological information, within both its bank and ditch, relating to its construction and use, and will offer information which will add to our knowledge of the division*

of the landscape in ancient times.’. This information will be accessible in the event of future damage to the monument or other intrusive investigation, as well as through further study based on remote sensing.

- 4.2.16 ***Communally / Traditionally*** the Bolster Bank has an important relationship to the living folk tradition of the Giant Bolster. Such relationships between massive earthworks and legendary giants is common across the UK and particularly notable in Cornwall.

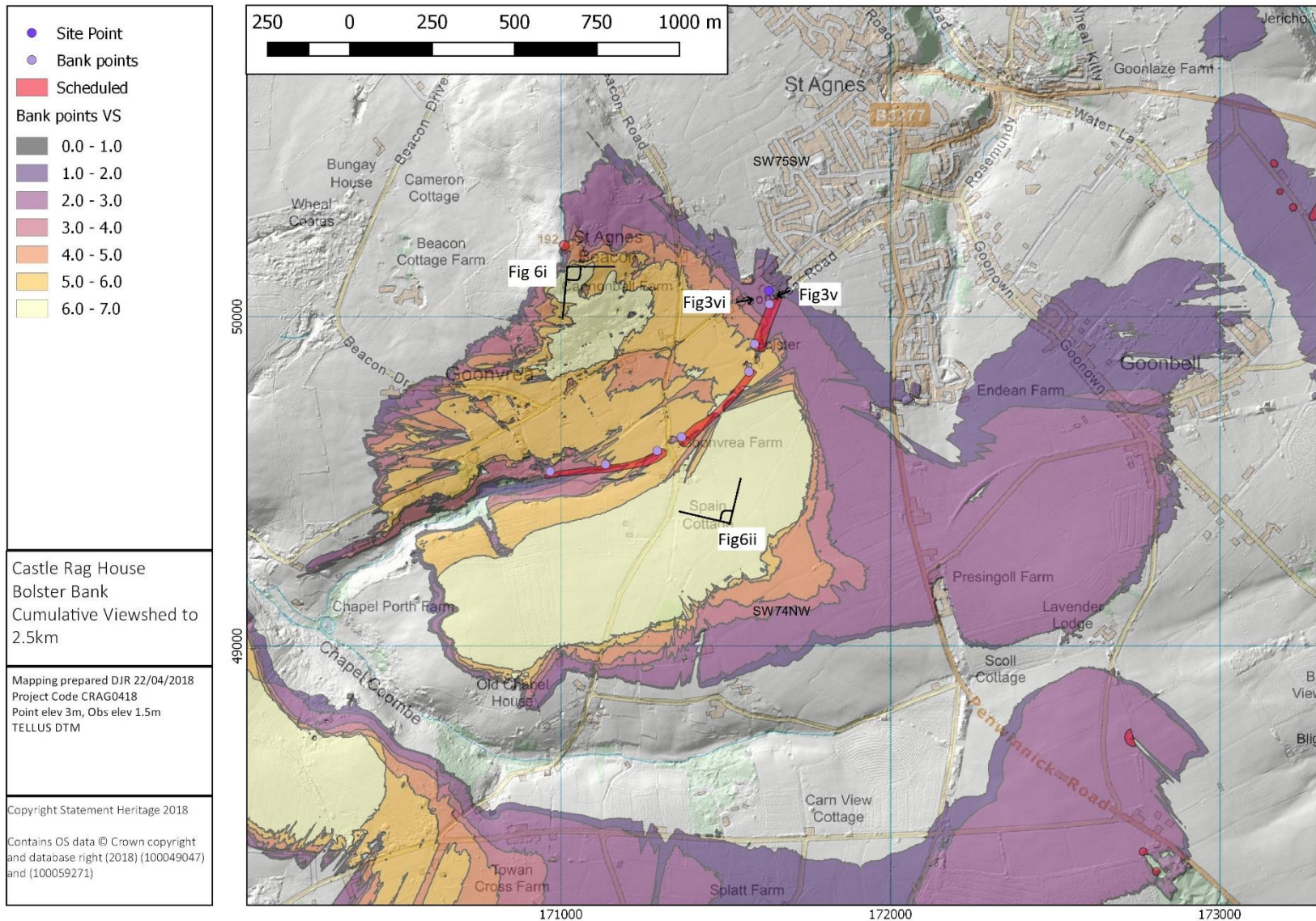


Figure 7: Theoretical Cumulative Visibility model of the Bolster Bank showing the location of principal photographic figures

Setting (Bolster Bank)

- 4.2.17 Figure 7 shows a cumulative viewshed of the Bolster. This visualisation is generated by placing a series of points (light blue dots on fig 7) along a Digital Terrain Model giving the elevation of a 'bare earth' model of the land. For the purposes of the model the points have been given a nominal height of 3.3m assuming the height of the bank at its highest point. The shaded areas of the map show the theoretical visibility zones of each representative 'bank' point across this model. These areas are shaded according to the number of points which are visible simultaneously, the lighter tones indicating higher visibility. Areas from which the monument is predicted to be invisible at any point are unshaded on Figure 7 apart from the greyscale tones used for the hillshaded base mapping.
- 4.2.18 The model indicates that the entire length of the monument would be visible from a wide plateau to its near immediate south before the upper reaches of the Chapel Coombe stream valley and from a smaller area immediately below and to the south east of the summit of Beacon Hill.
- 4.2.19 Photomontages (Figure 6i and 6ii) have been presented to show typical views from these locations. The location from which 6i is taken is within the 'access land' of the hill, Fig 6ii shows the clearest view that can be obtained from two or three points along a public footpath SW 718 498 to SW713 494 where reasonably complete views of much of the Scheduled monument can be appreciated. Along most of this footpath views of both the monument and development site are screened by intervening hedgerows, a clearer view provided from the tops of a series of 4 stone stiles crossing these fields, these points including that from which Fig 6ii is taken. It is likely that within private land within the highest visibility zones of the model away from the public footpath other viewpoints similar to 6ii could be attained. From the south, the landscape context of the monument in relation to the scattered housing and smallholder fields of the WHS area can readily be appreciated, as well as to the mass of St Agnes Beacon Hill and to the summit cairn, a Bronze Age 'Bowl Barrow' reused in the late 18th and early 19th century as a signalling station (Scheduling Description and HER record).
- 4.2.20 Figure 6i provides a clearer prospect of most of the monument, from which an observer with some fore-knowledge of its presence can readily appreciate its course. From both viewpoints the location of the proposed development can be identified with reference to the roof of Castle Rag House, at most only visible from upper first storey level.
- 4.2.21 Figure 6 also shows the location of Figures 3v and 3vi which show the development site from Goonvean Road from the east and west respectively. From 3v the eastern terminal of the Bolster monument is faintly discernible to an informed observer as its vegetative covering appears above the later hedgerows around it, but without foreknowledge is likely to register as a monument, and event this indication is contingent on maintenance of the current (potentially damaging) vegetation. Across the road the development site is bordered by a tall domestic evergreen hedge with only the roof of Castle Rag House visible.
- 4.2.22 From the opposite direction (Fig 3vi) Goonvrea Road appears typical of many narrow rural Cornish roads at the edges of settlements, with the residential curtilage and hedge of Castle Rag house to the left and an older typical Cornish hedge to the right.
- 4.2.23 Field testing demonstrated that from points closer to the monument only shorter sections are visible in which the potential development site rarely appears. These viewpoints are useful in appreciating the finer detail of the monument and its relationship to the later landscape immediately around it. A selection of representative views from our field testing are presented with discussion at Figure 8.

- 4.2.24 It is likely that, with the exception of the Bronze Age barrows that crown St Agnes Beacon, the Bolster Bank constitutes the oldest component of the landscape within the area discussed in this report. As noted by Johnson the tenements of Bolster and Goonvrea and their associated early medieval enclosure landscapes slightly overlap the line of the monument. Phasing between these landscape elements is uncertain and would benefit from further work. It may be that the Bank was laid out over an existing landscape, with later landscape subdivision and settlement being superimposed or it could be earlier, reflecting Iron Age enclosure systems now only recoverable archaeologically. Which ever of these is the case, the surrounding agricultural landscape character divisions continue to reflect what has probably always been an interstitial location in terms of landscape.
- 4.2.25 The above analysis provides a strong case that the significance of the monument is best appreciated from locations where its full scale and relationship to these different land use zones, and the natural topography can be appreciated. This setting is most harmed at the eastern end of the Bolster and immediately to the east of the proposed development site, by its loss to mining and then subsequent residential development (Johnson notes that the bank itself is recorded to have been robbed for its refractory clay substance in this location in the time of William Borlase (1740 *cited in* Johnson 1980).
- 4.2.26 The traditional folklore associated with the Bolster monument, lends weight to the degree to which those locations in which it can be appreciated at scale contribute to its significance. The degree to which such monumental features within landscapes are often attributed active roles within oral narratives suggests that they played an important role in making practical, political and social connections between people and places, a social practice observed in many historical and contemporary societies (Tilley 1994, 35-67; Paphitis 2014). As such the degree to which these traditional stories can continue to be 'read' from the physical landscape constitutes a very important attribute of their settings.



i) (above) When viewed without the benefit of wider views the Bolster reads as a particularly large Cornish hedgbe as here, forming the rear boundary of a medieval enclosure south of the development site. Castle Rag House is the closest slate roof behind.



ii) (above right) Section of the Bolster bank supporting mature self seeded trees to the east of Goonvrea Farm



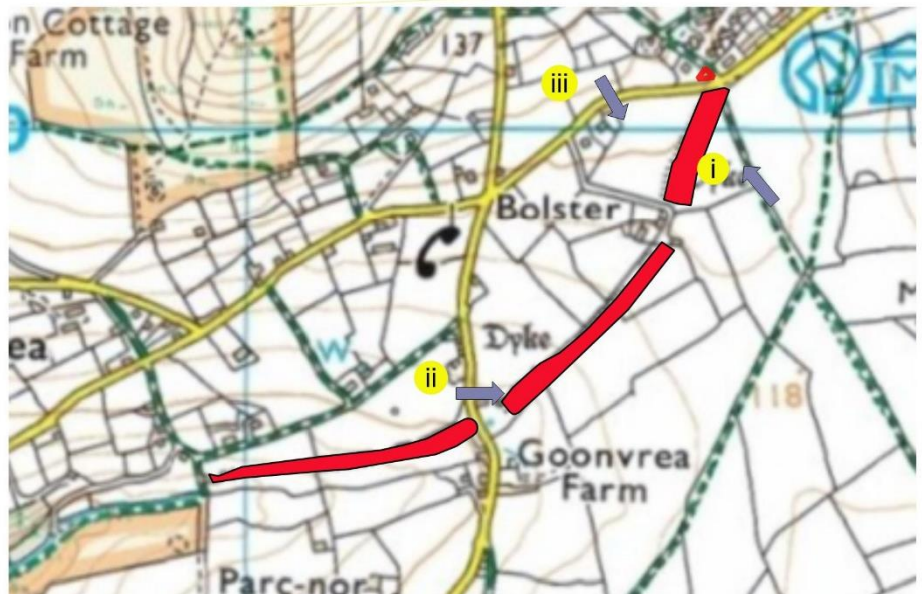
iii) (right) Similarly, The rear elevation of the same section pictured in (i) is about 3m high, but appears as a natural part of the 'cornish hedged' anciently enclosed landscape.

Castle Rag House
Figure 8
Detail photography
Bolster Bank

Photos prepared DJR 24/04/2018
Project Code CRAG0418

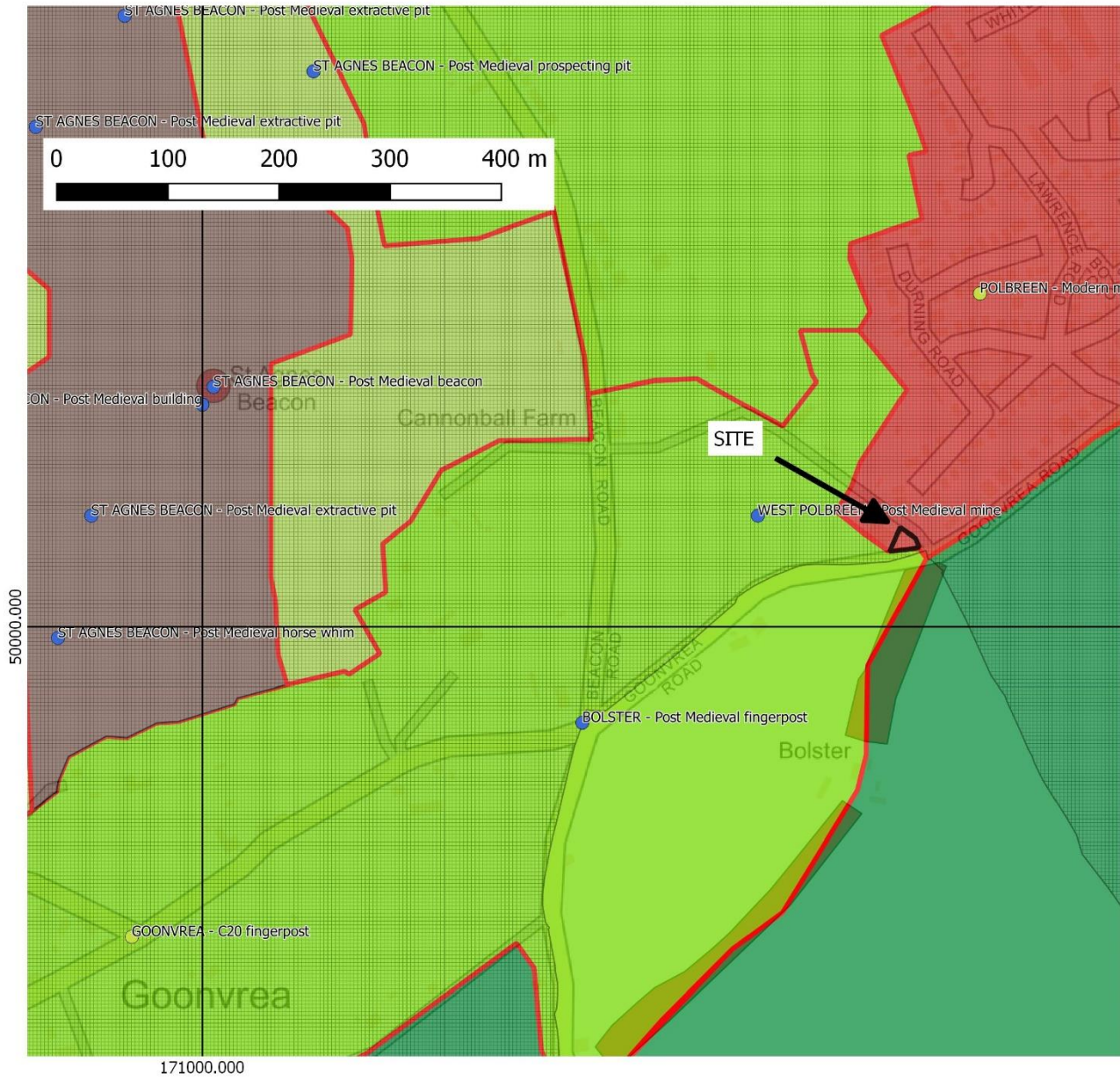
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Description: Area 7 Cornish Mining World Heritage Site.

- 4.2.27 The southern boundary of the site corresponds to the southern boundary of Area A7 of the WHS which follows Goonvrea Road at this point before turning south along the public footpath to the immediate east of the Bolster.
- 4.2.28 Area A7 is described within the Appendix A1 of the WHS Management Plan (Cornwall Council 2013) as being *'important for both copper and tin throughout the 18th and 19th centuries, and activity within the narrow mineralised zone to the east and south of the granite boss of St Agnes Beacon has left a legacy of spectacular cliff workings and coastal engine houses, its narrow stream valleys the former sites of dressing floors and water-powered stamps'* The Beacon is described as the hub of the area, visible as it is for many miles and providing 'stunning' views' across the designated area.
- 4.2.29 Only the south eastern slopes of the Beacon lie within the viewshed of the proposed development. Attributes of 'Outstanding Universal Value' (the term describing the significance of the WHS in legislation and planning policy) include a range of earthworks relating to the early prospection and extraction of tin and, perhaps most notably a well-preserved landscape of 'smallholder enclosure' to the southern slopes, extending towards the site. A substantial mound of mining spoil survives not far to the north of the modern residential group of which the site forms part and the majority of older buildings within this area are likely to have been built for miners. This patchwork of small enclosures interspersed with dispersed clusters of cottages is clearly shown on figure 6ii with key features also illustrated on figure 9.
- 4.2.30 The still rural part of the landscape demonstrates both **authenticity** (in that it is a true representation of the inscribed cultural tradition) retaining much **integrity** (a measure of wholeness and completion as part of the functional totality of the World Heritage Site) (UNESCO, 2000)



- World Heritage Site
- Scheduled Monuments
- OUV Items**
 - Modern
 - Post Medieval
- Historic Characterisation (Statement Heritage)**
 - Coastal Mining
 - General Residential
 - Medieval Farmland
 - Smallholder Enclosure
 - Upland Rough Ground
 - Larger Surveyed Enclosure

Castle Rag House
 Figure 9
 WHS OUV

Mapping prepared DJR 24/04/2018
 Project Code CRAG0418

Scale 1:5000 @ A4

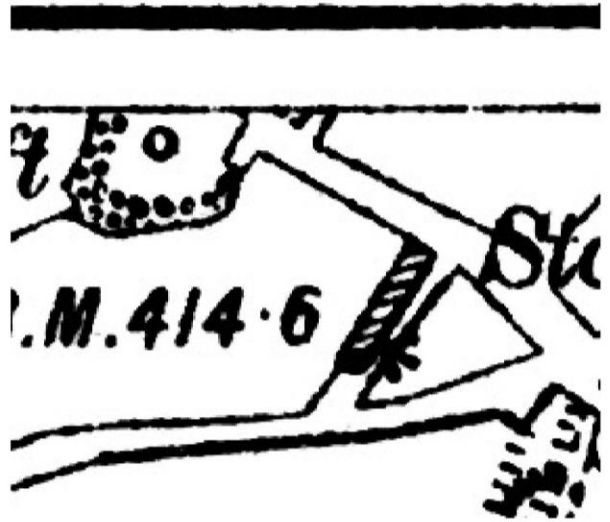
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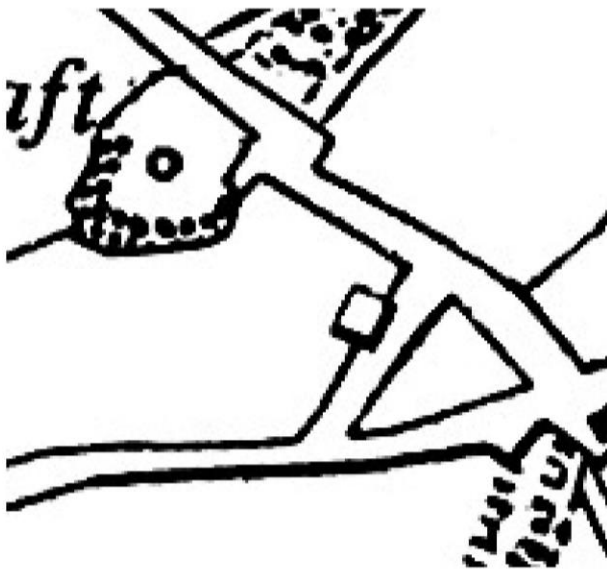
- 4.2.31 As a settlement whose growth was closely related to the mining industry and the export of its products, the urban area of St Agnes is included within the WHS area; however the modern housing immediately adjacent to the site displays no attributes of Outstanding Universal Value, being constructed after 1914 - which acts as the upper date limit of the WHS 'Property'.
- 4.2.32 The current development site has evolved from a small triangle of land which was probably formerly a part of this smallholder landscape, originally formed by the construction of a short terrace, probably of miners cottages shown on the 1830s Tithe Survey of St Agnes stretched between Goonvrea Road and the still unmetalled track to its north east which provided access to the mine at Polbreen, Cannonball farm and cottages and the wider mining landscape of the Beacon.
- 4.2.33 These cottages are depicted on the 1906 OS 6 inch survey (figure 10), but have been replaced by the time of the 1958 equivalent revised and re-projected National Grid mapping by a smaller building, shown more clearly on the 1972 1:2500 survey as 'Trevecan' a bungalow which was demolished and replaced with the current Castle Rag House in 1997 (LPA ref C1/PA25/0105/97/N). The former road to the front of the former cottages has been lost and incorporated into the garden of Castle Rag. A further new dwelling, a two storey property of modern design but featuring traditional materials of killas stone and slate with substantially slate hung elevations to the north and west was consented to the north west of Castle Rag House (see figure 2) in the last five years, visually and physically separating Castle Rag from the surviving spoil heap (probably related to West Polbreen mine) at SW71565012.
- 4.2.34 The residential development and its associated creation of ornamental curtilages has resulted in the absorption of the development plot into the residential character zone to its immediate north east.



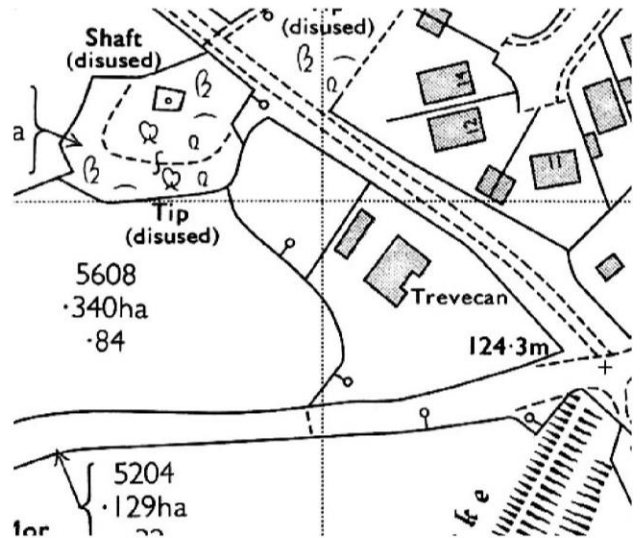
1830s St Agnes Tithe Map



OS 6 inch County Series LVI N.E. (extract), 2nd Ed. Surveyed 1906 Published 1908



OS 1:10560 National Grid Provisional Ed. SW75SW (extract) Surv 1906 Reprojected and Revised 'for significant changes' 1958



OS 1:1250 SW7050-7150 (National Grid) 'Compiled from County Series Mapping and Revised 1972' (crown copyright 100059271)

Castle Rag House
Figure 10
Historic Map Extracts

Mapping prepared DJR 24/04/2018
Project Code CRAG0418

Paper mapping and digitised Tithe
mapping kindly provided by Cornwall
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4.3 Step 3: Assessing the impact of the proposal on heritage assets and their settings.

Bolster Bank Scheduled Monument

- 4.3.1 The degree to which development of a single residential building on the proposed development site affects the settings identified above flows relatively simply from the analysis and evidence already presented.
- 4.3.2 Whilst the close proximity to the eastern end of the monument might initially suggest a very high sensitivity to such development, it has been demonstrated that the principal setting of the monument lies in locations where the whole, or most, of the earthwork can be appreciated.
- 4.3.3 From the raised area of highest visibility to the south of the Bolster (ref fig 6) the development is unlikely to add significantly to the perceived urban mass already present towards the eastern end of the monument. The development can be predicted, with some confidence, and with reference to the existing height and massing of Castle Rag House and the new building to its north west, to be visible, at most, from mid-first storey and roof height only. Much the same may be said of closer views along the footpath to the immediate south of the development site (fig 8i). From the south the visually recessive nature of the materials proposed to be used at first storey level (natural slate and naturally finished self-weathering timber) will help integrate the development well with its surroundings.
- 4.3.4 From more elevated positions on the Beacon hillside it is also clear that the relationship of the proposed dwelling to these existing buildings will reduce any impact from a similarly massed building to close to zero, the new development aligning mostly behind Castle Rag House. Again the use of natural materials will be beneficial.
- 4.3.5 Closer to the new development, from locations to the east (but not from the west) on Goonvrea Road (figure 8v) the development may be co-visible with vegetation growing from the top of the bank. This location does not contribute in any meaningful way to an understanding of the significance of the monument.
- 4.3.6 These impacts can be characterised as **neutral** to the significance of the monument.

Area A7 of the World Heritage Site

- 4.3.7 It has been shown above that the area to the west of the development very much warrants its inclusion within the World Heritage Site, including a number of key OUV attributes such as smallholding enclosures, mine remains, spoil, and miner's cottages.
- 4.3.8 However, it is generally understood in policy that '*not all elements of a World Heritage Site... will necessarily contribute to its significance*' (NPPF P128).

- 4.3.9 The redevelopment, at least twice, of the proposed development plot since the demolition of the miners cottages that were once sited here, reflects an example of the piecemeal, and perhaps inevitable, incremental loss of the mining landscape prior to its inscription.
- 4.3.10 Consequently development within this plot is not likely to, in principal, constitute harm to the significance of the World Heritage Site, as **its current residential character will not change**, although the effect of the design of that development on the character of the site is nevertheless an important consideration

Buried Archaeological Remains

- 4.3.11 The redevelopment of the plot, including within its boundaries by the removal of a former track, a garage, and the construction of a pond and other garden structures and landscaping activities will have reduced the potential for earlier archaeological remains to survive within the site.
- 4.3.12 Nevertheless, the proximity of the site to the Scheduled Monument indicates a raised potential for archaeological remains related to its construction or use to have previously existed within the site.
- 4.3.13 The limited footprint of the development means that prior trial trenching and of the site is unlikely to be proportionate.
- 4.3.14 The limited effects of the development, and the level of previous development both reduce the potential for the development to encounter significant archaeological remains.

4.4 Step 4: Maximising enhancement and minimising harm

- 4.4.1 In respect of both the setting of the Scheduled Monument and the character of the World Heritage site, careful and high quality design of the development will be essential.
- 4.4.2 Policies within the adopted World Heritage Management Plan (2013) of relevance here include
- *P3 Planning Authorities will ensure that new development protects conserves and enhances the Site and its setting*
 - *C3 New development will add to the quality and distinctiveness of the Site by being of high quality design and respectful of setting.*
 - *C7 The historic character and distinctiveness of the Cornwall and West Devon mining landscape will be maintained.*
- 4.4.3 Our recommendations for mitigation by design were: *comments following the submission of revised designs in italic.*
- Not to exceed the height or massing of the existing modern development (Castle Rag House and the newer house to its immediate north). *This has been achieved by the design.*
 - To pay close attention to the micro-location and orientation of the new building within the development plot, so as to ensure additional massing from the north west, south west and south is kept to an absolute minimum. *This has been achieved by the submitted design.*
 - To pay careful attention to detailing of the roof and walling materials. In general, locally sourced materials tend to harmonise best with natural surroundings. Examples of the success of this good practice can be seen in the use of slate roofing and hanging on Castle Rag House and the adjacent new build, which ensure the buildings are recessive into views against or from the hillside. *Naturally weathering timber boarding provides an excellent solution, and makes reference to the historic use of timber across the mining landscape.*
 - Careful attention to the design and vernacular of older cottages within the small-holder landscape which will form the context of the new development would be rewarding, however it is considered important, in order to maintain the ‘authenticity’ criteria of the site’s inscription, not to produce new fabric which could be confused with old. *The traditional scale form and massing of the design is noted, as is the avoidance of pastiche.*
 - Retention of the existing southern boundary of the site (a high evergreen hedge over a probably modern Cornish hedge) would provide a degree of continuity with the current street scene. *Site plan 1939-P02 May 2018 shows the retention of a c2.30m stone wall and hedge boundary.*

4.5 Step 4: Recording decisions and monitoring outcomes.

- 4.5.1 In accordance with P141 of the NPPF and Policy 24 of the Cornwall Local Plan the submission version of this report will be submitted to the Cornwall and Scilly Historic Environment Record on its submission with a valid planning application (ie once it falls into the 'public domain'. Until such time the report is considered subject to client confidentiality.

5 Conclusions.

- 5.1.1 This report has thoroughly assessed the setting of the Bolster Bank and the Cornish World Heritage site area within which the proposed development falls.
- 5.1.2 Based on this assessment we are confident that the effects of development of the proposed design, within the proposed location, and assuming high quality design, would result in no more than **negligible less than substantial harm** arising to the Scheduled Monument, and no adverse effect whatsoever resulting to the Cornish Mining World Heritage site.
- 5.1.3 The potential of the development to affect buried archaeological remains has also been considered. It is considered that the development has a **low potential to impact on non-designated assets remains of local to regional importance.**

6 References

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7 Archive

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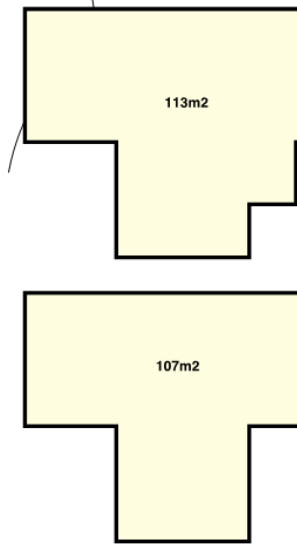
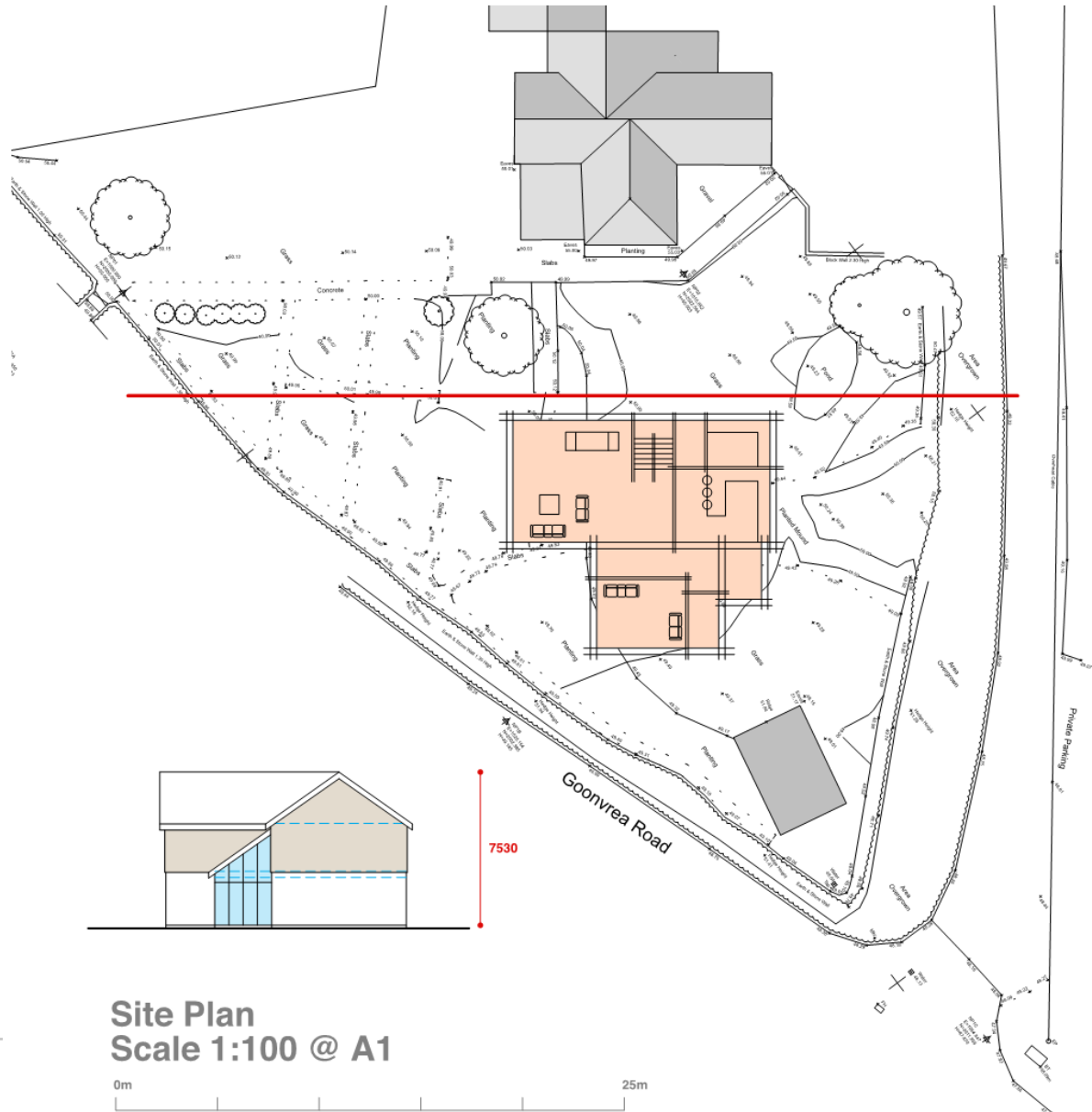
Admin/ Project Proposal Documentation .pdf

Report/ Project Report, drafts and figures .doc and .pdf files

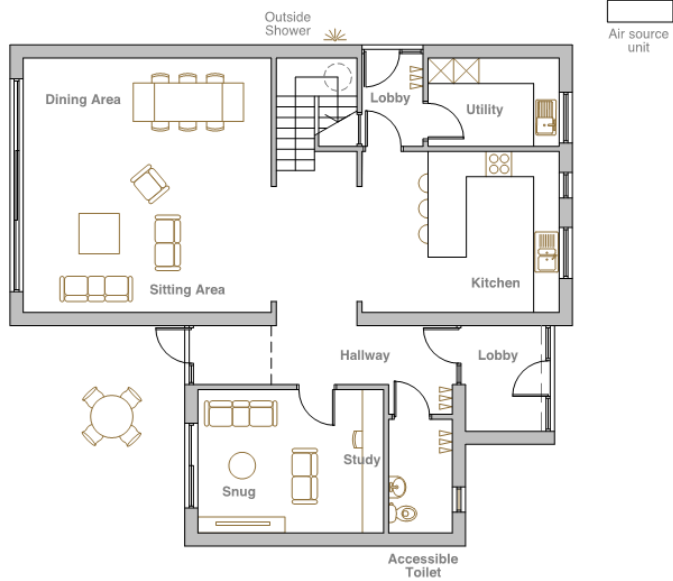
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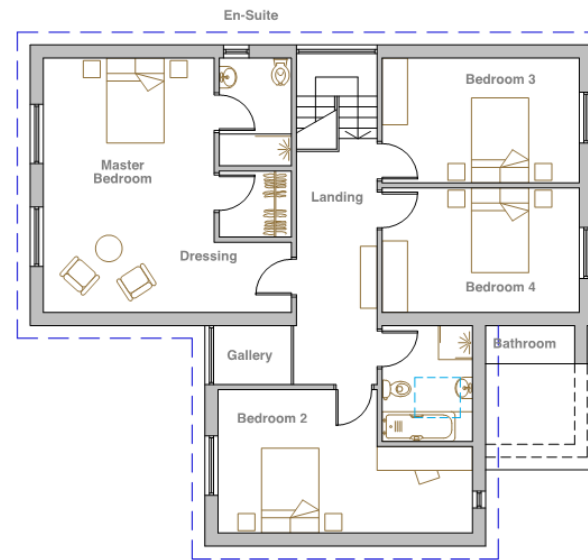
8 Appendix 1



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DRAW. NO. 1939-P02	REVIEWER
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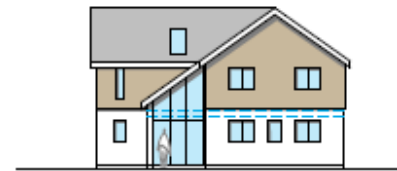


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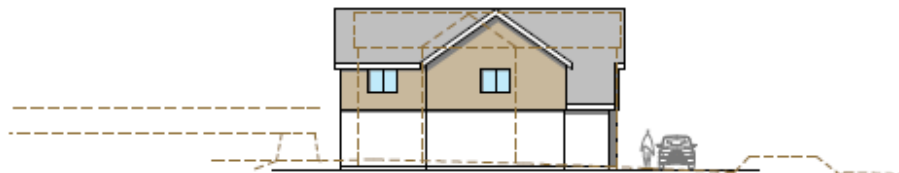


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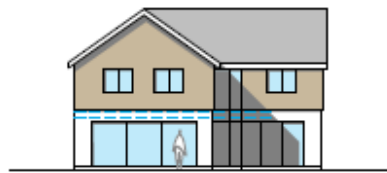
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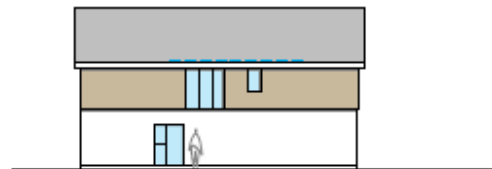
North East Elevation



South East Elevation



South West Elevation



North West Elevation

Construction Materials

External walls: Painted smooth sponge finish sand/cement render at ground floor / natural horizontal timber weather-boarding at first floor
 Roof: Gray natural dry-laid slate with red clay dry ridge system
 Roof/window: Velux centre-pivot roof window with recessed flashings
 Doors and windows: Grey aluminium
 Rainwater goods: Galvanised steel round section 'Lindab'

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Proposed Elevations	
1939-P05	
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