

# OCEAN WAVES THE BOUND CAWSAND CORNWALL

Results of a Heritage Assessment



South West Archaeology Ltd. report no. 220801



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# Ocean Waves, The Bound, Cawsand, Cornwall

## Results of a Heritage Assessment

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Work undertaken by SWARCH for a private client (The Client)

### SUMMARY

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*This report presents the results of a heritage assessment carried out by South West Archaeology Ltd. (SWARCH) for Ocean Waves, The Bound, Cawsand, Cornwall, in advance of a proposed roof raise and extension.*

*The property is an example of early-mid 20<sup>th</sup> century development, and its narrative marks a high associational/historical value, with early 20<sup>th</sup> century, British actress Dame Gracie Fields and well-known showman Arthur Pitt. It replaced an earlier three-storey building, similar to that which still exists to the north of the bay today, and was sat between sailing lofts, fish cellars and small boat-building workshops. These former historic features of The Bound sadly no longer survive and can only be identified from earlier photographs, aside from sections of the heavily altered former fish cellars, incorporated into the property known as The Bay.*

*The proposals, although extensive, were found to have only a **Slight/Moderate** scale of effect and **Negligible overall** change to the building, as the property has been quantified as having limited heritage value. Furthermore, the roof raise was considered to have a **Neutral** affect to The Bound as so much has been raised and altered already, particularly to the south of the site. The small gabled dormers to the eastern front are considered to be respectful, and in keeping with other similar, localised styles and will if anything improve the appearance of the building, replicating to a greater extent the cottage which formerly stood on the site and the adjoining taller 20<sup>th</sup> century and modern buildings.*

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August 2022

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## ACKNOWLEDGMENTS

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THE CLIENT (FOR ACCESS)

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## 1.0 INTRODUCTION

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<b>LOCATION:</b>	OCEAN WAVES, THE BOUND, CAWSAND
<b>PARISH:</b>	MAKER-WITH-RAME
<b>COUNTY:</b>	CORNWALL
<b>CENTROID NGR:</b>	SX 43387 50198
<b>PLANNING REF:</b>	PA22/05303
<b>SWARCH REF:</b>	COWR22
<b>OASIS REF:</b>	SOUTHWES1-508203

### 1.1 PROJECT BACKGROUND

South West Archaeology Ltd. (SWARCH) was commissioned by a private client (The Client) to undertake a heritage assessment for the Ocean Waves property, The Bound, Cawsand. The assessment was undertaken to consider a proposed scheme to alter and raise the roof space to allow for extensive loft conversion works, as part of planning application PA22/05303. This work was undertaken in accordance with best practice and relevant Cifa guidelines.

### 1.2 TOPOGRAPHY AND LOCATION

The property sits along The Bound, fronting Cawsand Beach, located within south-east Cornwall on the Rame Peninsula. It overlooks Plymouth Sound to the east, sitting at a height of 11.0m AOD and approximately 6km south-west of Plymouth City Centre. The site sits within the Cawsand Conservation Area and borders the Mount Edgcumbe Country Park – Grade I Listed park and garden area associated with the local gentry Edgcumbe family. Cawsand, and neighbouring Kingsand, boasts several areas of exposed, Permian rhyolitic volcanic rock systems, which have formed a large SSSI (Site of Special Scientific Interest) along this coastline. The soils of the area are recorded as the well-drained, acidic, loamy soils of the Denbigh 1 Association, which overlie the slate, silt, and sandstone of the Whitsand Bay Formation (BGS 2022).

### 1.3 HISTORICAL & ARCHAEOLOGICAL BACKGROUND

The parish of Maker-with-Rame was formed in 1941 from the former ecclesiastical parishes of Maker & Rame and occupies the eastern end of the Rame Peninsula, which sits within the deanery and south division of East. Maker, in Cornish *Magor*, is a village between Cawsand and Rame Head, and is first referred to in 750AD, appearing later within the Domesday recordings. It was held by the Crown until 1066 when it was gifted to the Valletort family. The manor then passed by marriage to the Durnford family and again by marriage in 1493 to Sir Piers Edgcumbe, who consequently owned all the land on the peninsula. Lyson's (1812) describes the border divide of the village, noting the church sat within Devon and the principle village of Inceworth sat within Cornwall. The manor of Rame belonged early on to the Rame family, passing through successive female heirs to the Durnfords and Edgcumbes.

Cawsand was first recorded in 1404 and the name is likely English in origin, meaning 'cow' and 'sand', hinting at an earlier farming settlement/area. Earlier spellings included *Couyssond*, *Cawsham*, *Cousham* and *Causon*; it is known in Cornish as *Porthbugh*. The earlier medieval settlement was centred around The Square to the centre of the coastal village. Fishing was an abundant industry to the early, local economy; particularly pilchard fishing, several fisheries/ cellars were built along the beach from the 16<sup>th</sup> century onwards. The settlement was also well known for boatbuilding and haberdashery, whilst low-key smuggling within the area was reputed to be rife. Richard Carew, a well-known, Cornish Gentleman and historian, wrote an account after surveying Cawsand in the 18<sup>th</sup> century describing the village as "...peopled with some dwelling houses, and many cellars, dearely rented for a short usage, in saving of Pilcherd..." Several fish cellars were known to exist between Cawsand and neighbouring Kingsand, with some surviving ruinous today along the coastline and other

incorporated into later houses. The later 18<sup>th</sup> century saw a large investment in fortifications to Cawsand, and a large fort was built to the north side of the village, maintained by the Edgecumbe family. This scheduled monument was part of a network of defences developed along Cawsand and Kingsand, defending Plymouth harbour and docks from potential attack, it survives as a 'near complete' example of a Palmerstonian fort, and includes remains of a late 18<sup>th</sup> century battery with a pair of granite sett gun platforms. Cawsand's defences were further developed and expanded upon, and an influence of Georgian architecture appears across the village, supplying local naval personal of the Channel Fleet with accommodation. Significant development is noted to occur within the village during the post-medieval period as the village continued to expand on its fishing industry. It was a thriving settlement with a diverse and highly skilled population, until the early 20<sup>th</sup> century, in which it saw rapid decline in fishing activities due to the motorised trawlers from Plymouth.

There is evidence of earlier, prehistoric occupation along the Rame Peninsula, including a number of Bronze Age burial sites close to Cawsand, and a known Iron Age enclosure at Rame Head. The Historic Landscape Characterisation (HLC) lists the village of Cawsand as an area of post-medieval development, originating from larger, surrounding, farming settlements. No intrusive fieldwork appears to have been carried out in this area of Cawsand, although several localised archaeological assessments have been made looking at the Listed Buildings within the area.

#### 1.4 THE CAWSAND CONSERVATION AREA & LOCAL POLICY

The Cawsand Conservation Area was designated in 1970, protected for its distinct architecture and/or historic interest and the character or appearance of which it was desirable to preserve and enhance. The Ocean Waves property although not a building of Listed status, sits within this conservation area which broadly covers the whole historic, urban core of the town. Ocean Waves is located to the north side of The Bound which directly fronts Cawsand Beach, overlooking Plymouth Sound and below Picklecombe Fort, a street described in the conservation area appraisal as a contrast to the narrow buildings that weave through the inland village. Within the appraisal the Council are aware "a number of insensitive and inappropriate works have taken place" (p.36), highlighting *The Bound* as an area of distinct '*loss*', along with a number of insensitive alterations/renovations to properties within the wider Conservation Area that include:

- the replacement of historic windows and doors with plastic alternatives
- the loss of slate-hung décor to the exterior faces of buildings and their replacement with non-local materials
- the loss of historic natural slate roofs
- insensitive treatments to building exteriors that includes cement-heavy render, and historic render removed to expose stonework

Furthermore, it notes a large number of modern buildings "do not respect the historic forms of development, detail or material", as such, it is preliminarily advised and noted that the proposed renovation works to the Ocean Wave property are done sensitively using local materials where applicable, as there is potential for cumulative and aggregate impact in this location.

General policy and guidance for the conservation of the historic environment are now contained within the *National Planning Policy Framework* (Department for Communities and Local Government 2021), and Section 69 of the Planning (Listed Buildings and Conservation Areas Act 1990. The relevant guidance is reproduced below:

*Paragraph 194 -*

*In determining applications, local planning authorities should require the applicant to describe the significance of any heritage assets affected, including the 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 be consulted, and the heritage assets assessed using appropriate expertise where necessary. Where a site on which a 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.*

*Paragraph 195 -*

*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.*

## **1.5 METHODOLOGY**

This assessment was undertaken in accordance with best practice. The fieldwork was conducted in July 2022 by A. Allen (ACIfA). The heritage assessment follows the guidance outlined in: Conservation Principles: policies and guidance for the sustainable management of the historic environment (English Heritage 2008), The Setting of Heritage Assets (Historic England 2015), Seeing History in the View (English Heritage 2011), Managing Change in the Historic Environment: Setting (Historic Scotland 2010), and with reference to Guidelines for Landscape and Visual Impact Assessment 3<sup>rd</sup> Edition (Landscape Institute 2013). The impact assessment also follows the guidance outlined in the Principles of Cultural Heritage Impact Assessment in the UK produced by ClfA, IHBC and IEMA in July 2021.





FIGURE 1: SITE LOCATION (THE SITE IS INDICATED).



## 2.0 BRIEF DESK-BASED ASSESSMENT

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### 2.1 DOCUMENTARY REFERENCES

Not much is known about the 19<sup>th</sup> century front of Cawsand, although certain deeds within the Kresen Kernow archives could provide more information.

The census is hard to decipher, as addresses are not clarified, merely street names, however what the census records can tell us is that there were clear shifting patterns and trends in occupations and population numbers in the area over the 19<sup>th</sup> century. In the early census records of 1841 and 1851, most men are employed in agricultural labouring, boatbuilding or fishing, with the odd specialist tradesman, such as carpenters and masons, or people working for the nearby Egdcumbe estate, such as game keepers. There are also large numbers of relatively young teens marked as apprentices, for both naval and fishing trades. A few men are marked as 'artillery' and have military titles, suggesting they may have been part of the forts garrison. In the 1861 and 1871 census, when the fort was being enlarged, there are a lot of workmen and naval/military administrative present in the community, some taking whole houses with their families, others shown as boarders; this influx, with many from Ireland, Kent and East Anglia, briefly swelled the shrinking population. From 1871 onwards people in the town are noted as 'barracks or battery', clearly working in the fort and more formerly many artillery men are documented. There are also some men working for the Trinity lighthouse company and several cottages are occupied by current or former coast guardmen.

In the 1841-1881 census there is more than one house which is occupied by multiple families, indicative of the hardships of the time. By the 1911 census however, the population numbers are reduced by approximately a third. Several households are now being marked as unemployed; and several buildings are also being recorded as unoccupied. There is however, an increase in new jobs, such a 'telegraphist' and more young women are generally employed, being dressmakers, clerks, post mistress and schoolteacher, clearly benefitting from female education, whereas many earlier women in the 1840s are marked as 'general servants'. There is however a continued focus of female employment in the 'cellars' or pilchard processing industry. Many naval personnel are still present and there are new industries within the navy shown, such as engineers, welders, 'engine fitters' and mechanics, working on the new fuel powered ships being developed. There is a marked reduction in the number of men and boys being noted as fishermen or boat builders, outside of the navy's employ and fewer youngsters are marked as apprentices to these professions. This 20<sup>th</sup> century change of fortune lead the Rame peninsula to be deemed the '*Forgotten Corner of Cornwall*' by government agencies and business groups. Throughout this period there is little evidence of who lived at Ocean Waves.

By the early-mid 20<sup>th</sup> century however, the sites association with a famous actress means there are documentary records of the building, before it was altered. Dame Gracie Fields, a popular British actress and singer of the 1930s, was known to have admired the former Ocean Waves property; documented on her fan page, from her archives, is a distinct account of Gracie "falling in love" with a '*little ramshackle cottage*' along Cawsand Bound after a short seaside visit. Her fiancé at the time, Archie Pitt a well-known British music hall performer and showman, decided to purchase the property for her as a gift/ holiday home. She was indeed very grateful and was supposed to carry the key for the property with her everywhere, although a few years later Archie was known to have demolished and replaced the former cottage, unbeknown to Gracie, with the Ocean Waves building as it stands today. She called him in dismay, arguing someone had destroyed the property she was known to have fallen in love with, and he had replied saying he had removed the former cottage, and replaced it with a "*modern house with a fine garden*", commenting the former cottage was a "*dilapidated, old place*". The account ends with a few pictures of the former cottage sat along the Bound, which would have been framed by fish cellars, boat building workshops and sailing lofts, although like the 19<sup>th</sup> century cottage, few of these former features survive (see Figures 2-3).



FIGURE 2: THE BOUND IN THE EARLY 20<sup>TH</sup> CENTURY, SHOWS THE BUILDING FORMERLY LOCATED ON THE OCEAN WAVES SITE, WHICH DAME GRACIE FIELDS WAS SAID TO "FALL IN LOVE" WITH.

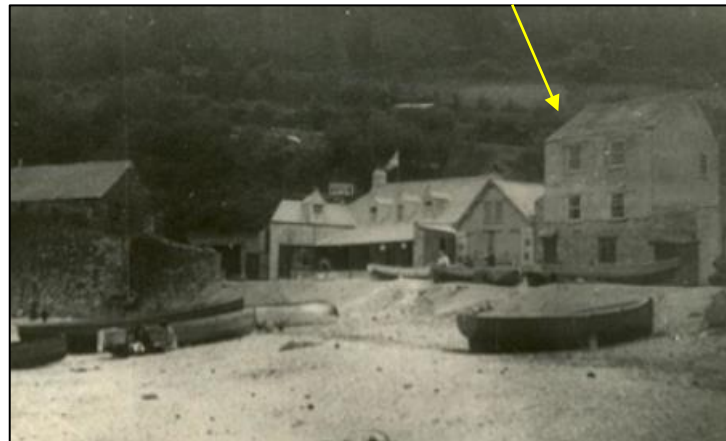


FIGURE 3: ANOTHER EARLY 20<sup>TH</sup> CENTURY PHOTOGRAPH OF THE BOUND, SHOWING THE SIDE PROFILE OF THE FORMER THREE-STORY OCEAN WAVES PROPERTY, INCLUDING THE NEIGHBOURING RENOVATED FISH CELLAR, NOTHING ELSE ALONG THIS FRONT SURVIVES TODAY.

## 2.2 CARTOGRAPHIC SOURCES

At the time of the tithe, Cawsand sat on the border of Devon and Cornwall between Maker and Rame, neighbouring Kingsand is sat within Devon, whilst Cawsand in Cornwall. The site can be identified on the 1840 tithe map of Rame and likely lies within plot 102a, which is described as a *Garden*, owned by the Right Honourable Earl of Edgumbe, and occupied by Edward Shuttlecock. The Bound at this stage is of different configuration, as a strip of land with a clear building (fish cellars) to its south end. The grey shading along the street edges, likely denotes the extent of built form suggesting there were buildings fronting onto the Bound.

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FIGURE 4: EXTRACT OF THE RAME TITHE MAP, c.1840. SOURCE: GENEALOGIST 2022. APPROXIMATE SITE LOCATION INDICATED IN RED.

TABLE 1: TITHE APPORTIONMENT 1840. SOURCE: THE GENEALOGIST.

Plot No.	Landowner	Occupier	Name of plot	Usage
98	Right Honourable Earl of Mount Edgcumbe	John Wills	Mills, Meadows & Hedges	Pasture
98a		John Warren	Garden	Vegetables
99		William Neal	Garden & hedges	Vegetables
99a		Thomas Ham	Garden	Vegetables
99b		William Pearce	Garden	Vegetables
101		Richard Vernal	Barn and Mowhay	Vegetables
102			Garden & hedges	Vegetables
102a		Edward Shuttlecock	Garden	Vegetables
103		himself	Millpool Field	Grass & Furze
104			White Rock	Grass & Furze
105		John Smith	Potato Plot	Vegetables
149		Samuel Sexton	Houses and Courtlage	

By the time of the publication of the First Edition Ordnance Survey Map of 1894 (surveyed in 1892; see Figure 3), Cawsand is depicted. The Bound can be seen to have a large fish cellar/ or building associated with a listed functioning limekiln just to the south, built to the south of the street against the cliffs. Several smaller buildings line the street, including a rectangular building within the plot of Ocean Waves - aligned north-south. 'The Square' is labelled to the north-east. There are several small plantations illustrated to the south, lining the Earl's Drive, which is now a part of the Edgcumbe listed Park and Garden area. An old limekiln is recorded to the north of the new St Andrews Church, and the county border has changed (yellow outline).

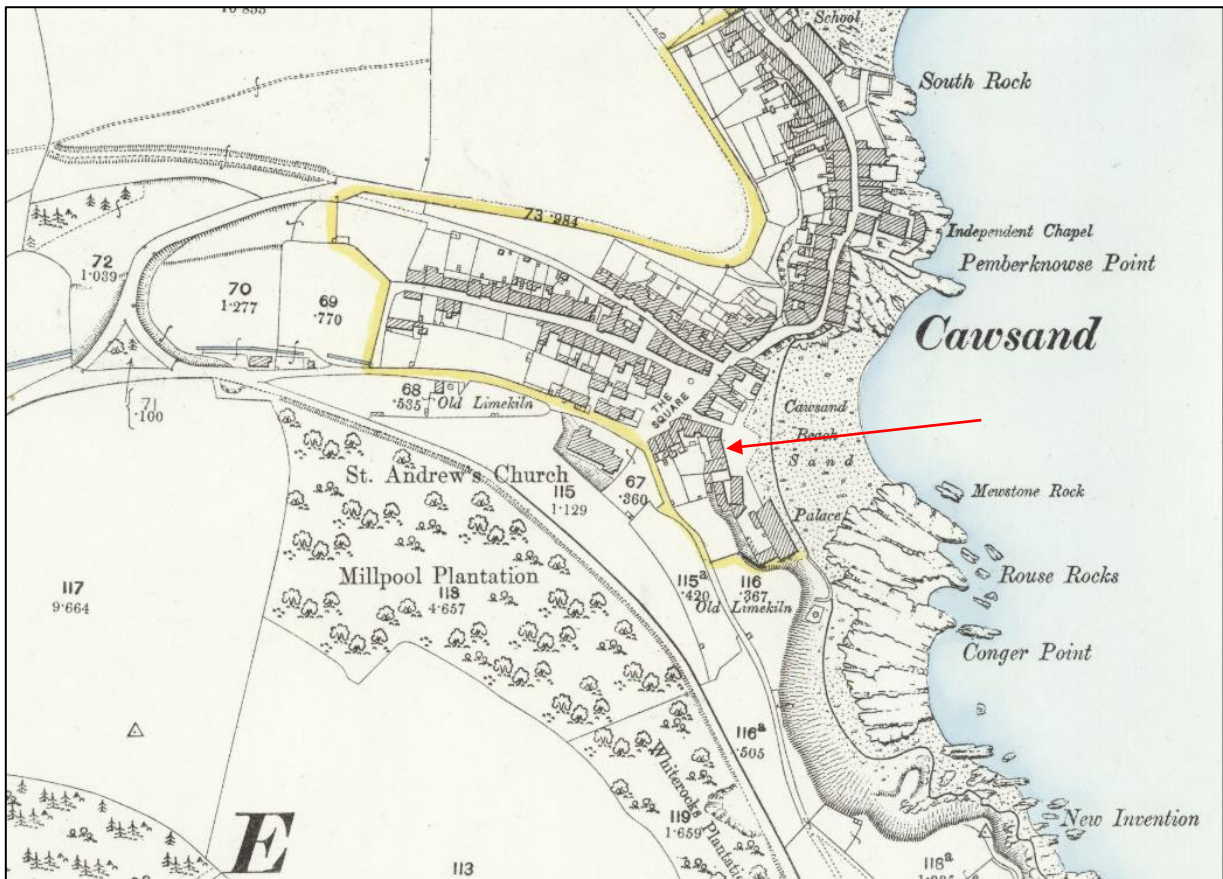


FIGURE 5: EXTRACT OF THE 1892 FIRST EDITION 25-INCH ORDNANCE SURVEY MAP. (NLS). APPROXIMATE SITE LOCATION INDICATED IN RED.

By the time of the Second Edition revised OS mapping, Cawsand has been illustrated with a lot more detail, and includes development to several individual houses within the village. The Bound has seen elements of change, and two smaller buildings have been lost to the south, the north end largely exists unchanged, including the building plot at Ocean Waves. The plantations still exist south of the Earl's Drive and the Limekiln to the south of The Bound, is still marked. A public house has been recorded within the north end of The Square the church has been extended. The large cellar, that may have been used within the fishing industry, or associated with workings at the neighbouring limekiln, is labelled as *Palace*.



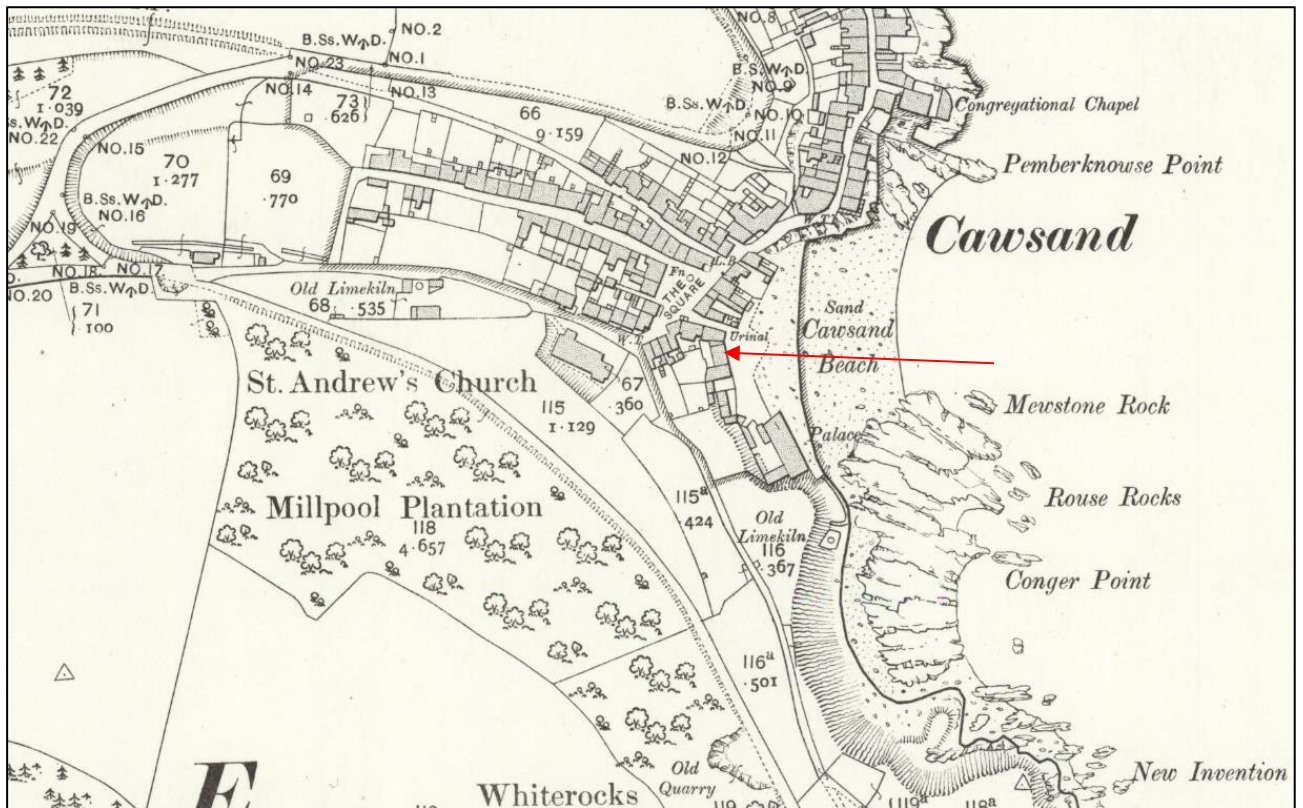


FIGURE 6: SECOND EDITION OS (25-INCH) REVISED MAP OF CAWSAND, SURVEYED 1905. APPROXIMATE SITE LOCATION IS INDICATED IN RED. (NLS).

### 2.3 HER DATA AND THE CAWSAND CONSERVATION AREA

The Ocean Waves building, is not a building of Listed status but sits within this conservation area which broadly covers the whole historic, urban area. There are several listed buildings to the north and west of the property, although along The Bound, none have been separately designated, including the recently renovated former fish cellars The Bay. The following maps (Figures 7-8) show the Cawsand Conservation area and its concentration of Listed buildings and Scheduled Monuments, in relation to the Ocean Waves property.

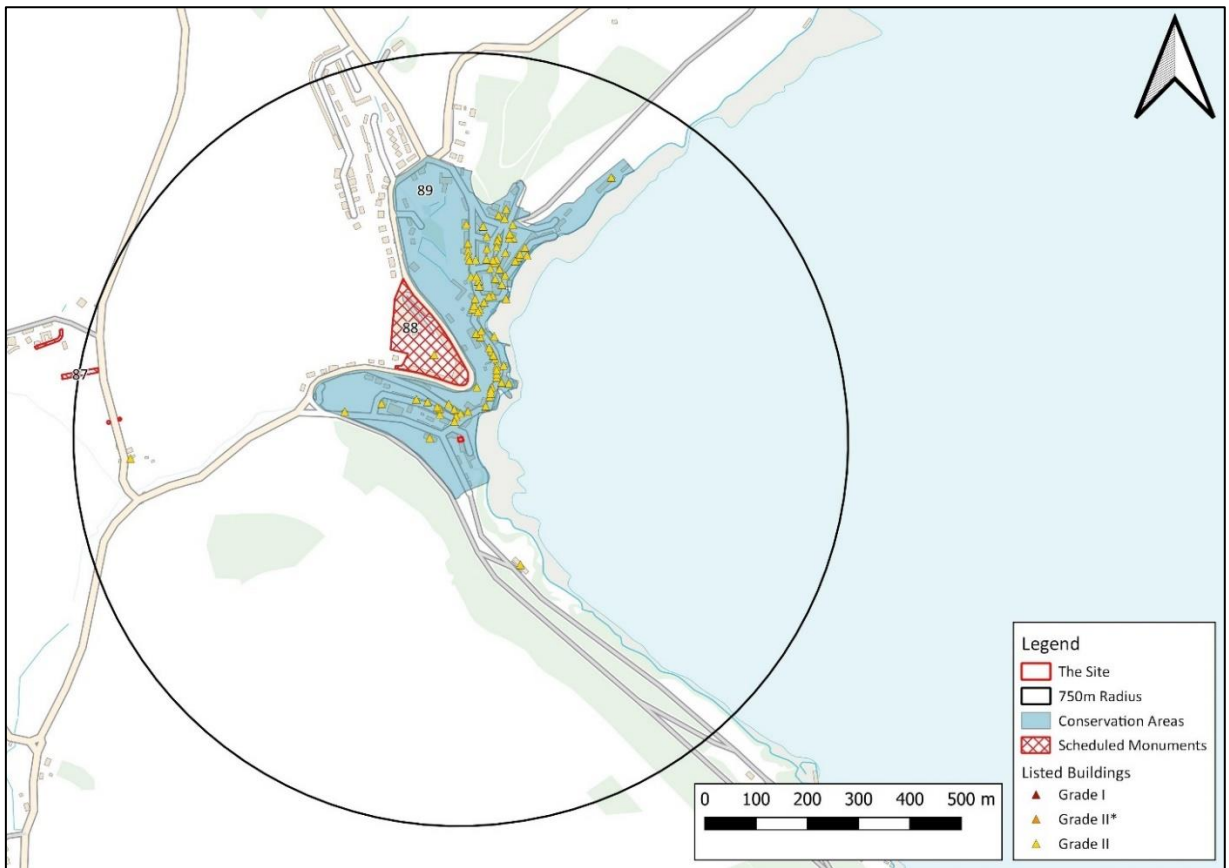


FIGURE 7: THE CONSERVATION AREA OF CAWSAND, WITH BUILDINGS OF LISTED STATUS IN RELATION TO OCEAN WAVES, AS MAPPED BY SWARCH USING QGIS v13 USING HISTORIC ENGLAND DATA.

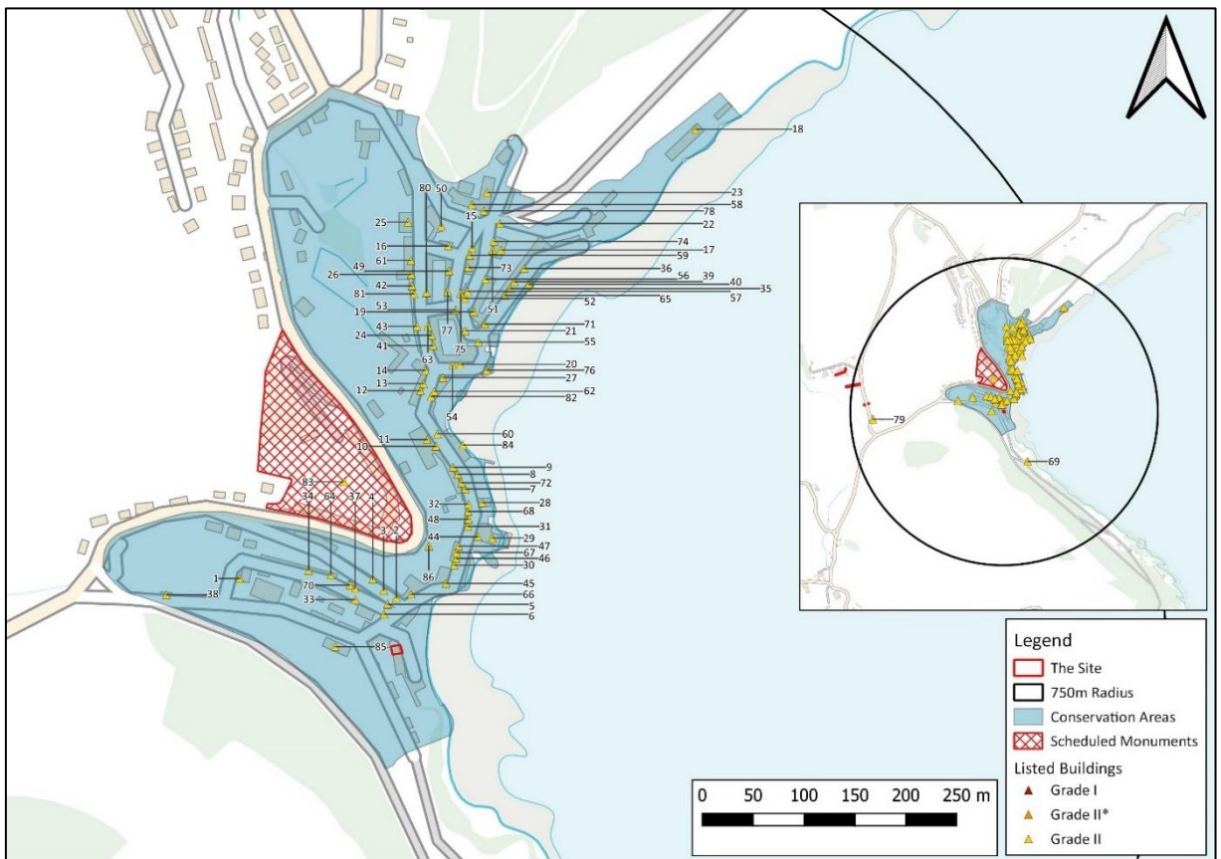


FIGURE 8: THE CONSERVATION AREA OF CAWSAND, WITH BUILDINGS OF LISTED STATUS IN RELATION TO OCEAN WAVES, AS MAPPED BY SWARCH USING QGIS v13 USING HISTORIC ENGLAND DATA.

TABLE 2: TABLE OF LISTED BUILDINGS, MAPPED USING QGIS V13.

Number	List Entry	Name	Grade
1	1140593	Vine Cottage and attached garden walls	II
2	1140594	Cousham Cottage	II
3	1140595	4, St Andrew's Street	II
4	1140596	Wynburn	II
5	1140597	Smugglers Inn	II
6	1140598	Fountain	II
7	1140635	Brick House	II
8	1140636	Trevarna	II
9	1140637	Kelvin House Warrawee	II
10	1140638	Ship Cottage	II
11	1140639	Gill's Karen's Kitchen	II
12	1140640	Beechfield	II
13	1140641	Trenarren	II
14	1140642	Halfway House Inn	II
15	1140643	Meryton House	II
16	1140644	The Rising Sun	II
17	1140645	Grey House And No 2 With Attached Walls	II
18	1140646	Martin's Cove Fish Cellars	II
19	1140647	Whispers	II
20	1140648	Nirvana	II
21	1140649	Charlestone House	II
22	1140661	Minnadhu	II
23	1140662	Cliff House	II
24	1140668	4, Fore Street	II
25	1140669	Maker And Rame Vicarage	II
26	1140670	The Narrowboat	II
27	1140671	Spindrift	II
28	1140672	Pemberknowse Cottage	II
29	1140673	Congregational Church	II
30	1140674	Old Ship Inn	II
31	1140675	Coast Cottage	II
32	1140676	Clarendon	II
33	1140692	Apple Tree Cot	II
34	1140693	Treetops	II
35	1140694	The Cleave House	II
36	1140695	Melrose	II
37	1160364	4, Armada Road	II
38	1160387	Penlee Lodge	II
39	1160399	Seasound	II
40	1160406	Island Cottage	II
41	1160674	Lyndale Cottage	II
42	1160708	59, Fore Street	II
43	1160716	Charterhouse Westward	II
44	1160762	The Manse	II
45	1160772	Balcony Cottage The Balcony	II



46	1160780	Ocean Gem Cottage	II
47	1160784	Seaward	II
48	1160801	Seacroft	II
49	1160859	High View Sunnyside	II
50	1160872	Cobble Close And Lexden With Attached Railings	II
51	1160882	Heavitree House	II
52	1160918	Redstones	II
53	1160925	6, Market Street	II
54	1160940	Eventide	II
55	1160951	Gale Cottage And House Attached To North	II
56	1225824	Dorset House	II
57	1225825	Meridian Spring Cottage	II
58	1310343	Four Boys Hillside	II
59	1310389	Algoma	II
60	1310426	April Cottage	II
61	1310438	Westside Cottage	II
62	1310450	Boundary House	II
63	1310469	6, Fore Street	II
64	1310594	Wedgwood Cottage	II
65	1310602	Devonport Inn	II
66	1329091	The Cabin	II
67	1329092	Nor Nour	II
68	1329093	Avon	II
69	1329100	Penlee Cottages	II
70	1329102	Kittiwake	II
71	1329103	Beach House	II
72	1329112	The Anchorage	II
73	1329113	Cobblestones Mount Morin	II
74	1329114	2, Heavitree Road	II
75	1329115	Bluehaven And House Attached To Rear	II
76	1329116	The Institute	II
77	1329117	Rose Cottage Stow Cottage	II
78	1329123	Kingsway House Kingway Cottage	II
79	1329126	Rose Cottage	II
80	1329127	21, Fore Street	II
81	1329128	60 And 61, Fore Street	II
82	1329129	Sam Hancock's	II
83	1329146	Cawsand Battery	II
84	1329163	Sea Wall Of The Old School House	II
85	1329167	Church Of St Andrew	II
86	1384208	War Memorial	II

TABLE 3: TABLE OF SCHEDULED MONUMENTS WITHIN CAWSAND, MAPPED USING QGIS v13.

Number	List Entry	Name
87	1007300	Royal Commission fortifications at Forder Hill including two musketry lines and a road block
88	1016102	Cawsand Fort

TABLE 4: CONSERVATION AREA OF CAWSAND, MAPPED USING QGIS v13.

Number	Name
89	Kingsand and Cawsand

### 3.0 HERITAGE IMPACT ASSESSMENT

#### 3.1 STREET SETTING

Oceans Waves property sits along the historic front of Cawsand Bay, to the south end of The Bound, accessed from the east from the former 'town' square. The street offers undisturbed vistas of Plymouth Sound and the quiet, secluded bay. To the north, the rising townhouses built along the cliffs provide a pleasing historic vista, and to the south side, the bay follows the coastal path that runs parallel to the historic Earl's Drive associated with neighbouring Mount Edgumbe Park. The south end of the street includes modern development between Ocean Waves and the large, recently renovated, mid-19<sup>th</sup> century fish cellars, now called The Bay. The northern side of the bound retains some areas of historical interest including a former public house, however the south end has seen significant development in recent years, and Ocean Waves appears slightly squat in appearance to these developments (see Figure 10).



FIGURE 9: OCEAN WAVES PROPERTY ALONG THE BOUND, AND MOUNT EDGUMBE COUNTRY PARK IN THE BACKGROUND, THE SITE IS HIGHLIGHTED. PICTURE TAKEN FROM THE NORTH.

#### 3.2 BUILDING DESCRIPTION

From its exterior appearance, Ocean Waves property looks to be an altered early-mid 20<sup>th</sup> century semi-detached building. It is currently a two-storey build, heavily rendered, with a weathered, slate-hanging to the first-floor level. A tall, likely brick-built stack sits on the south end of the property which is also heavily rendered. The roof is steeply pitched to the south, east and west, with an extended hipped range to the north. The roof is currently slated on thin timber batons, with black-glazed terracotta ridge tiles. A small front rendered, low garden wall marks the east boundary to the street, and a small courtyard can be accessed via a gated alley along the north elevation, which includes high walls to the neighbouring house with scarring for former smaller outbuildings present and a small cut niche to the south side of the west boundary. The windows are modern timber double glazed replacements with a light brown colour to the frames, consistent on all elevations, they are not original to the building. Within the ground floor eastern elevation, a very large, square, chunky lintel is sat over

the window opening and is possibly reused architectural salvage from the local area. A small, circular, lead-framed, fish-eye 'porthole' window sits to the south side of the east elevation, giving a 'sea-side' theme to the overall aesthetic.



FIGURE 10: OCEAN WAVES EAST ELEVATION.



FIGURE 11: THE WEST ELEVATION AND WEST BOUNDARY WALL. TAKEN FROM THE NORTH.

### 3.3 HISTORIC FEATURES

The current building is an early-mid 20<sup>th</sup> century building with later alterations/ additions throughout the later 20<sup>th</sup> century period. There do seem to be a few internal features deemed of historic interest, in brief:

- Internal doors – the internal doors noted throughout the ground-floor and first-floor level are particularly interesting, although whilst they appear to be of good, planked, vernacular form, it is possible they are reworked architectural salvage or ‘heritage style’ copies, as they look to pre-date the property and do not fit the surrounding door frames. A similar, unpainted door was spotted in the loft.
- Rear western boundary wall includes a series of build lines/ scarring for earlier buildings and a small niche to the south side, could relate to the earlier three-storey townhouse, and may represent the partial remains of this earlier building.
- Several areas of “mock” beams look older than they perhaps are. If this building was built for Dame Gracie Fields, to replace an earlier three-storey cottage, it is possible Arthur Pitt commissioned an overall mock-vernacular, rustic aesthetic, and thus, most of what exists is an attempt to create an earlier-looking building, e.g. the chunky lintel in GF living space.

### 3.4 CURRENT ROOF STRUCTURE

Access to the current roof space allowed an assessment to be made with regard to the proposed changes. Entry to the loft space, was made from a loft-hatch accessed from the first-floor landing to the north side. The roof is steeply pitched to the south, east and west, with an extended hipped range to the north-east. The rafters use machine-sawn timber nailed to the main pyramidal structure; these sit underneath thin, regularised, machine-sawn batons with which the slate is tacked on to – a typical, early-mid 20<sup>th</sup> century build. It is tied to the corners with thin timber ties pinned to the joists. The north-east range looks consistent with the original footprint of the building, not a later forced extension, or remains of an earlier build etc. It is currently not felted but remains dry. A large, modern brick-built stack sits on the southern edge with a dark grey mortar, and the rafters have been cut around its north, east and west sides.





FIGURE 12: STEEP PITCH TO THE SOUTH, EAST AND WEST.



FIGURE 13: THIN TIMBER TIES PLOTTED IN THE CORNERS ATTACH THE ROOF STRUCTURE TO THE JOISTS.

69



FIGURE 14: THE NORTH-EAST RANGE.

### 3.5 THE PROPOSALS

The proposals look to raise the roof, creating a third loft-level space, altering the existing roof layout to that of a gabled roof, complete with a large single, flat-pitched dormer to the west elevation, and two smaller, gabled dormers to the east. Some alterations look like they will be made to the ground floor and first floor levels, but changes are generally concentrated within the north-west corner, where the building will be squared up, instead of its current footprint. Therefore, much of its original layout and plan will remain, with any historic features left largely unaltered.



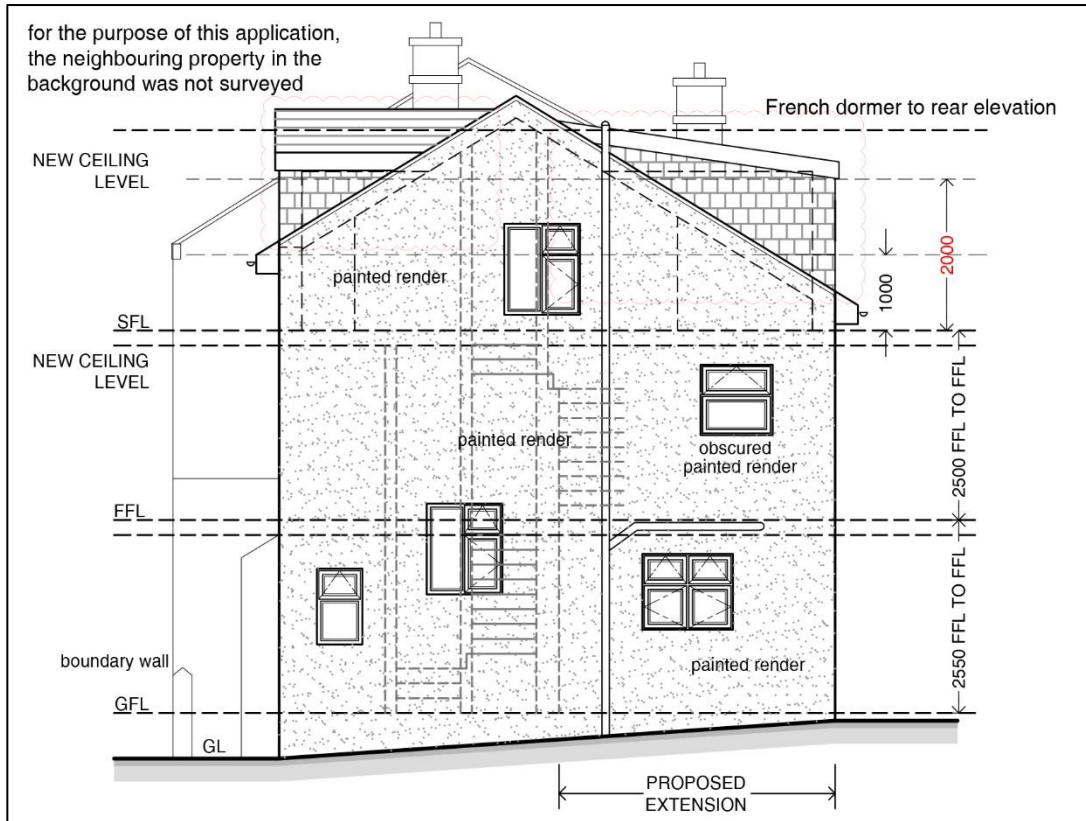


FIGURE 15: PROPOSED NORTHERN ELEVATION, SHOWING THE NORTH-WEST EXTENSION AND PROPOSED DORMERS TO THE EAST AND WEST. AS SUPPLIED BY CLIENT.

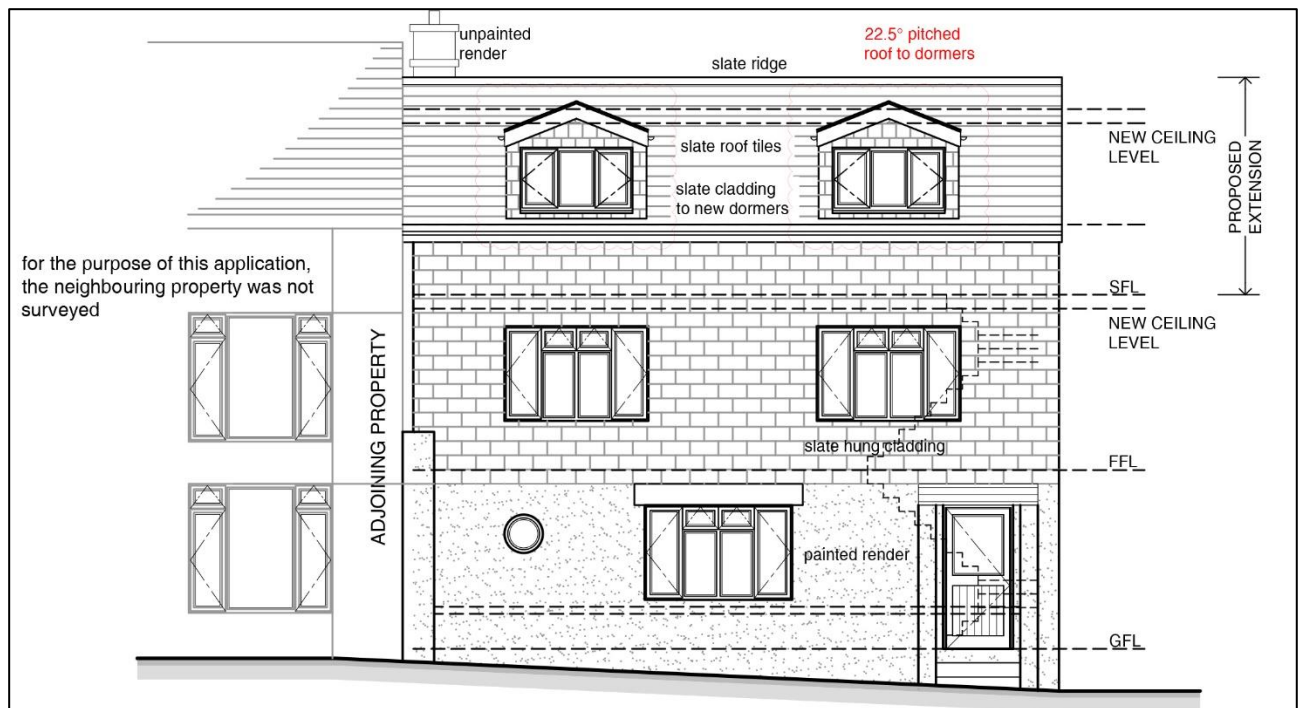
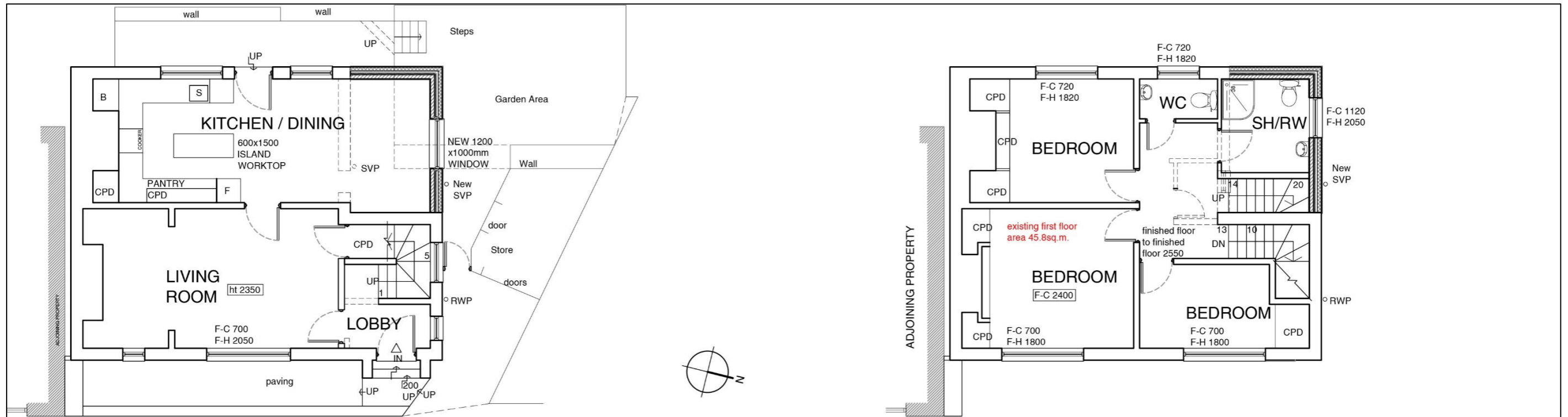
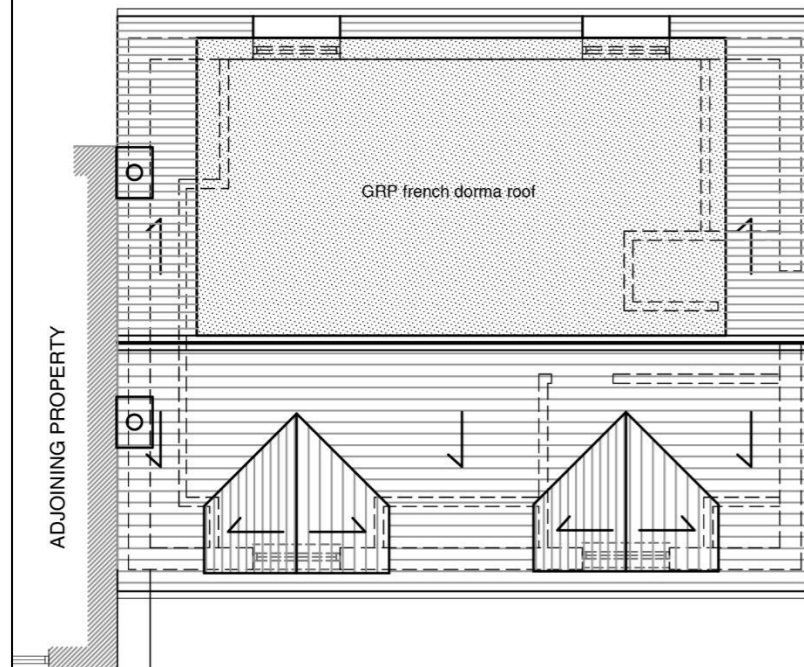
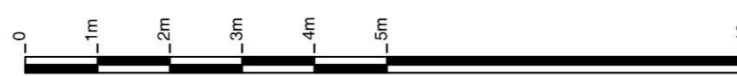


FIGURE 16: PROPOSED EAST ELEVATION, AS SUPPLIED BY CLIENT.

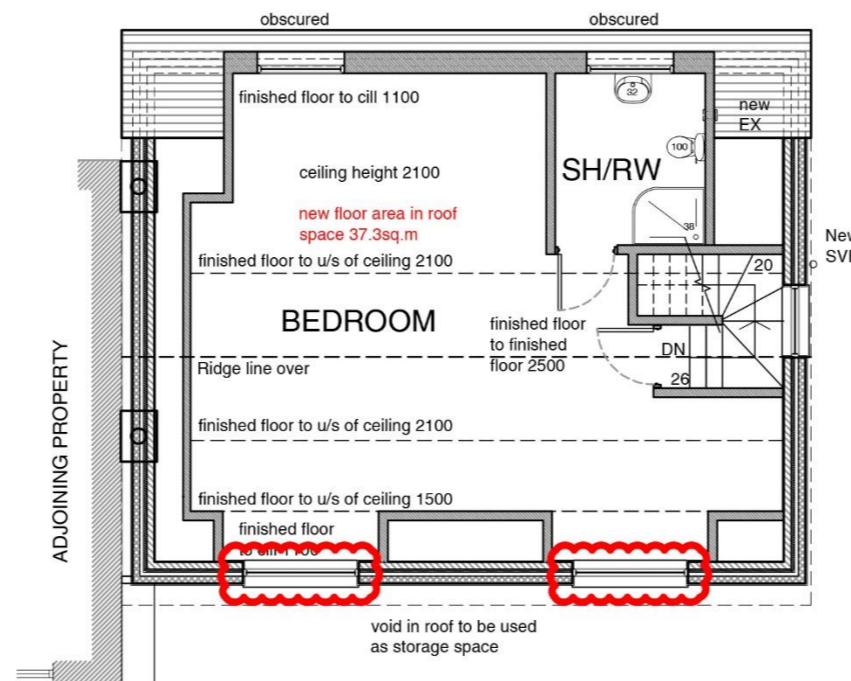


PROPOSED GROUND FLOOR PLAN  
Scale 1:100

PROPOSED FIRST FLOOR PLAN  
Scale 1:100



PROPOSED ROOF PLAN  
Scale 1:100



PROPOSED SECOND FLOOR PLAN  
Scale 1:100

NOTE: total new floor area of side + roof extension 50.5m<sup>2</sup>

Rev B Updated to Clients Request  
Rev A Updated to Planning Request

August 22  
June 22

Proposed Two Storey + Roof Extension to 'Ocean Waves' The Bound Cawsand PL10 1PG	M. D. ASSOCIATES. Architectural Consultants. 93A. Fore Street. Saltash. Cornwall PL12 6AE tel.01752-840910 tel.01579-346043
Date May 2022 Scale 1:100 Drawn MS/DM	
PROPOSED GF FF SF RF PLANS 1072/03	A B

FIGURE 17: OVERALL PLAN OF PROPOSED CHANGES TO OCEAN WAVES, AS SUPPLIED BY CLIENT.

### 3.6 STATEMENT OF SIGNIFICANCE

The Ocean Waves property, located on The Bound, Cawsand, is an example of early-mid 20<sup>th</sup> century building, which replaced an earlier three-storey building. It sits to the south end of the Cawsand Conservation Area and limited historic features were found to survive within the build. Whilst the building has *very low evidential and aesthetic value* – its external elevation is heavily rendered, and internally elements have been made to create an aesthetic that is mock-historic - it was found in the desk-based assessment that the building does however have a *very high historical and associational value* to famous British actress Dame Gracie Fields. The former property was bought for her, by her then fiancée Arthur Pitts, however Arthur replaced the earlier three-storey building Gracie ‘fell in love with’ with what stands today. The current internal features and materials found, align with an early-mid 20<sup>th</sup> century build date, including the roof structure, which provided a very limited heritage value overall, although current integrity may be quite high – the timbers were uniform, machine-sawn and typical of this era of build. According to the Dame Gracie Fields fan page, it is clear people visit the area to look at the house that was connected to her, in this instance it is deemed to have *low-medium symbolic and iconic value*. The building has no known *communal value*, and it is generally considered, *an authentic early-mid 20<sup>th</sup> century build*, but its internal aesthetic choices do not match its exterior. It is of local value and is of historic interest but isn’t considered comparable to other historic assets in the area; the primary conservation value is ephemeral and intangible, the building deriving its significance from the association only with Ms Fields and the site on the frontage/Cawsand itself, but being far from static in its development.

### 3.7 DISCUSSION OF THE PROPOSALS

The Ocean Waves property sits to the south end of the Conservation Area, and towards the northern end of The Bound, on the Cawsand front. Much of this area of Cawsand has already been heavily renovated/ rebuilt, which is overlooked by the more historic northern end of the bay, with rising two and three-storey buildings creating the valuable, historic vista of the bay. The property sits next to a building, likely of similar age, if not slightly later, with a higher roof structure and similar details. These early-mid 20<sup>th</sup> century buildings sit alongside a large modern development further south with large Velux’s to their roof level, that are characterised by their modern glass and timber panelled aesthetic and full, double-storey dormers to their east elevation. The former fish cellars to the very south end of The Bound, is of similar style to this, and also exhibits large Velux windows and a later raised roof/ altered roof shape. This section of The Bound has sadly lost a lot of its original historic features, being renovated, and replaced in the 20<sup>th</sup> century with alternative, modern spaces. Whilst the Ocean Waves property is not listed, it does provide an element of earlier 20<sup>th</sup> century development.

Much of its original layout and footprint is intended to stay, with a north-west extension changing the building into a single, large block, removing the current north-west corner. Whilst the removal of this corner significantly changes the footprint, the former layout can still be identified through the retained stairwell to the ground and first floor levels. The roof extension is considered a major, change and will heavily alter its exterior appearance, particularly to the most observed elevation – the east, although small gabled dormers can be found on earlier buildings within The Square, to the rear of the property. The west elevation cannot really be seen from street view, or from the higher aspects of the nearby coastal footpath, although will possibly be visible from the rising streets to the north of the bay. The dormer on the west elevation is large and could set a precedent for future works to surrounding houses, as no other of this style were spotted in the immediate area, during the site visit; this aspect of the design may need careful consideration. Comparatively, the smaller, gabled dormers to the east are considered more respectful and mimic similar, localised styles, and there is probably some capacity to enlarge these slightly with no additional impact.

The surrounding village, within the Cawsand Conservation Area, was also considered during the site visit, and many smaller Velux windows look to have been added to several other loft spaces of buildings, some of which are listed, within the immediate vicinity. The west end of the village has been

largely built up with modern estates, and the 18<sup>th</sup> century fort to the north-west has been adapted into a modern housing development. The village is a large mix of architectures, although most buildings survive from the mid-19<sup>th</sup> century as can be identified from the tithe map, earlier 18<sup>th</sup> century buildings frame the northern edge of the bay with key vernacular details identifiable from their exteriors.

It has been found the current Ocean Waves building retains very limited heritage value and, as The Bound Street has seen much modern development, a roof raise to the property is unlikely to impact the surrounding area, considering surrounding buildings, and the aesthetic of the current building. IN fact raising the building is more in keeping with what was historically on the site (a three-storey house), and the higher rooflines of all building to the south. Whilst Ocean Waves does have *high symbolic and associational value*, the footprint of the house “built for Dame Gracie Fields” will remain, although its exterior appearance will be altered. The proposed changes to the Ocean Waves property are therefore considered to have a **Slight/Moderate** scale of effect and constitute overall **Negligible** change to the building, as the property has been quantified as having *limited heritage value*. Furthermore, it is considered to have a **neutral** affect to The Bound, and the wider Conservation Area, although the creation of a larger dormer (proposed west elevation) could set a precedent within the village.

Within the conservation area appraisal for Cawsand it states that the Council are aware of “a number of insensitive and inappropriate works have taken place” (p.36), highlighting **The Bound** as an area of distinct ‘**loss**’, along with a number of insensitive alterations/renovations to properties within the wider Conservation Area that include:

- the replacement of historic windows and doors with plastic alternatives
- the loss of slate-hung décor to the exterior faces of buildings and their replacement with non-local materials
- the loss of historic natural slate roofs
- insensitive treatments to building exteriors that includes cement-heavy render, and historic render removed to expose stonework

It is therefore advised, work is done sensitively, aiming where possible to use local materials, and avoiding plastic alternatives. The proposed drawings retain the slate-hung coursing, which is a distinctive vernacular feature of the Ocean Waves eastern elevation. The potential cumulative impact of the changes to Ocean Waves, could potentially cause cumulative impact to the streetscape of the front in Cawsand and the historic views. There is also the potential for aggregate impact to the conservation area, from one more development in this area, although conversely the existing damage and modern character could also be considered to create flexibility and have already set precedent. It is felt on balance, the care taken in these plans to follow fairly traditional aesthetics will actually improve the overall aesthetics and recreate a more uniform row along The Bound, instead of the somewhat messy skyline profile from the different heights of buildings we see today. Ultimately it will restore a three-storey building to the site. **Neutral/slight impact** for both cumulative and aggregate impact is given, which is comfortably within the allowable, *less than substantial harm* category.

## 4.0 CONCLUSIONS AND RECOMMENDATIONS

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The Ocean Waves property sits along the bay front of Cawsand, located within an earlier designated Conservation Area. This coastal village has a diverse make-up, with earlier vernacular coastal cottages, and three-storey townhouses lining the northern edge of the bay, and the historic centre. The bay provides valuable views to Plymouth Sound and is framed by elements of the Mount Edgumbe Estate to the north, south and west. Remains of earlier industry exists beyond Cawsand with several ruinous fish cellars surviving to the beaches and an old limekiln to the south. The village is characterised by its small lanes and idyllic location, and The Bound Street provides the main access to the bay and beach. Ocean Waves sits amongst modern development, distinguished by their projecting glass and timber panelled aesthetics.

The Ocean Waves property is an example of early-mid 20<sup>th</sup> century development, and its narrative marks a high associational/ historical value, with its former connection to early 20<sup>th</sup> century, famous British actress Dame Gracie Fields and well-known showman Athur Pitt. It replaced an earlier three-storey building, similar to that which exists to the north of the bay today, and was sat between sailing lofts, fish cellars and small boat-building workshops. These former historic features of The Bound sadly no longer survive and can only be identified from earlier photographs, aside from sections in the largely altered former fish cellars, now called The Bay. The proposals, although extensive, were found to have a **Slight/Moderate** scale of effect and **Negligible** change to the building, as the property has been quantified as having limited heritage value. Furthermore, the roof raise was considered to have a **Neutral** affect to The Bound as so much has been raised and altered already, particularly to the south, although a larger dormer, as proposed on the west elevation, could set a precedent within the village and wider Conservation Area. The smaller gabled dormers to the eastern front are considered to be more respectful, and in keeping with other similar, localised styles. **Neutral/slight impact** for both cumulative and aggregate impact is also given, which is comfortably within the allowable, *less than substantial harm* category.



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**The Genealogist** <https://www.thegenealogist.co.uk/>

**National Library of Scotland** <https://maps.nls.uk>

APPENDIX 1: SUPPORTING PHOTOGRAPHS



1. THE BOUND AND FRONT, TAKEN FROM THE SOUTH-EAST, CAWSAND FORT TO THE REAR.



2. THE RISING NORTHERN HISTORIC VISTA AND BAY. TAKEN FROM THE SOUTH.





3. THE DOMINATING, RECENTLY RENOVATED FORMER FISH CELLAR – THE BAY. TAKEN FROM THE SOUTH-EAST. OCEAN WAVES CAN BE SEEN TO THE RIGHT.



4. THE ROOFSCAPE OF CAWSAND, OCEAN WAVES CAN BE SEEN (ARROWED) ALONGSIDE MANY OTHER GABLED DORMERS AND VELUXES.





5. THE SURVIVING RUINOUS 19<sup>TH</sup> CENTURY FISH CELLARS BEYOND NEIGHBOURING KINGSAND.



6. OCEAN WAVES AGAINST ANOTHER 20<sup>TH</sup> CENTURY BUILD, AND MODERN DEVELOPMENTS; TAKEN FROM THE NORTH.

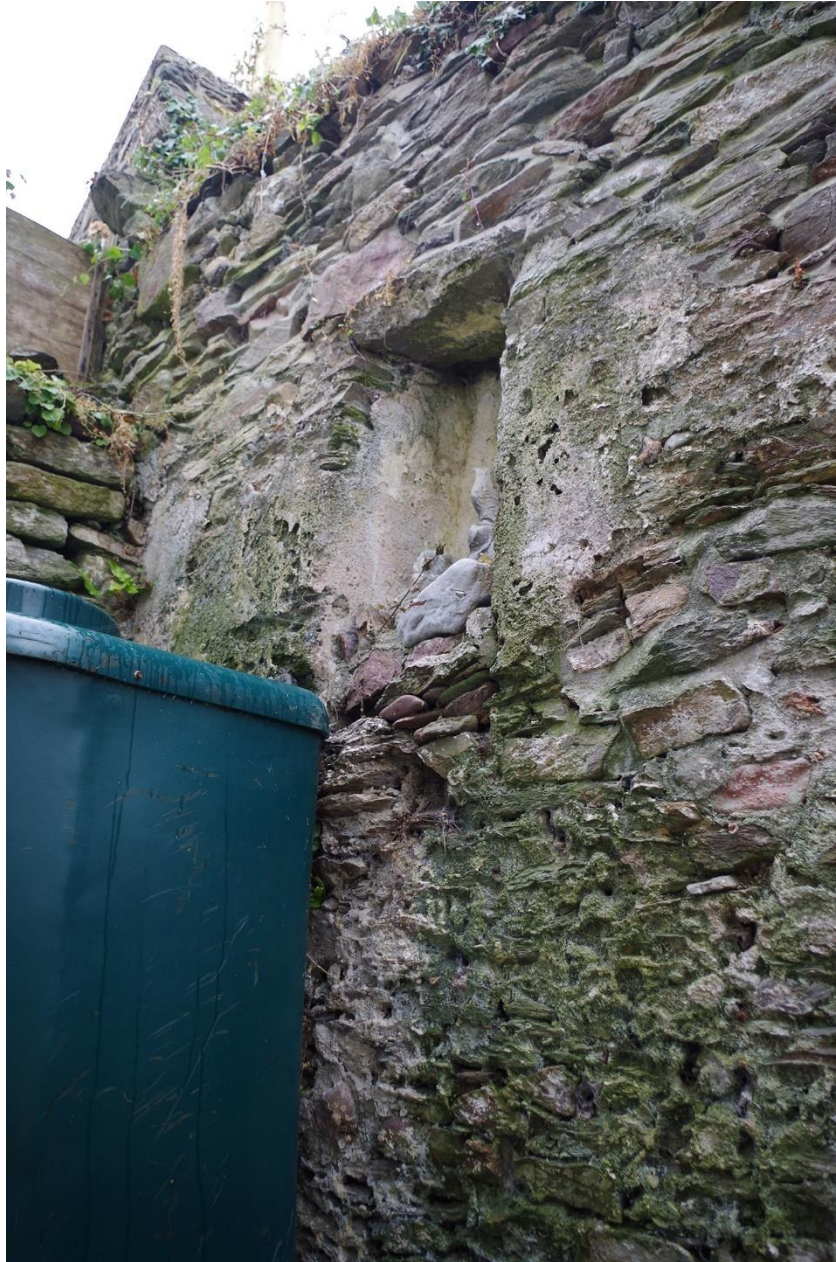


7. THE BOUND, LOOKING SOUTH TOWARDS THE BAY.



8. THE NORTH-WEST CORNER, WHICH WILL KNOCKED THROUGH TO CREATE AN EXTENSION; TAKEN FROM THE NORTH.





9. NICHE (BLOCKED WINDOW?) IN WEST BOUNDARY WALL.



10. THE SCARRING FROM FORMER OUTBUILDINGS ON WEST BOUNDARY WALL. TAKEN FROM THE NORTH-EAST.





11. THE GROUND FLOOR LIVING ROOM, WITH ALTERED FIREPLACE, AND CHUNKY LINTEL POSSIBLY ARCHITECTURAL SALVAGE. TAKEN FROM NORTH.



12. THE MOCK-STYLISED INTERNAL BEAMS, GIVING THE EFFECT THE BUILDING IS EARLIER.



13. THE FIRST-FLOOR LANDING WITH MOCK-VERNACULAR/ ARCHITECTURALLY SALVAGED INTERNAL DOOR. TAKEN FROM THE EAST.



## APPENDIX 2: IMPACT ASSESSMENT METHODOLOGY

### Heritage Impact Assessment - Overview

The purpose of heritage impact assessment is twofold: Firstly, to understand – insofar as is reasonably practicable and in proportion to the importance of the asset – the significance of a historic building, complex, area or archaeological monument (the ‘heritage asset’). Secondly, to assess the likely effect of a proposed development on the heritage asset (direct impact) and/or its setting (indirect impact). The methodology employed in this assessment is based on the approaches advocated in *Managing Significance in Decision-Taking in the Historic Environment* [GPA2 Historic England 2015] and *The Setting of Heritage Assets 2<sup>ND</sup> Edition* [GPA3 Historic England 2017], used in conjunction with the ICOMOS [2011] and National highways [DMRB LA 104 2020] guidance. This Appendix contains details of the statutory background and staged methodology used in this report.

### National Policy

General policy and guidance for the conservation of the historic environment are now contained within the *National Planning Policy Framework* (Department for Communities and Local Government 2012 revised 2021)<sup>1</sup>. The relevant guidance is reproduced below:

#### Paragraph 194

*In determining applications, local planning authorities should require the applicant to describe the significance of any heritage assets affected, including the 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 be consulted, and the heritage assets assessed using appropriate expertise where necessary. Where a site on which a 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.*

#### Paragraph 195

*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.*

A further key document is the Planning (Listed Buildings and Conservation Areas) Act 1990<sup>2</sup>, in particular section 66(1), which provides *statutory protection* to the setting of Listed buildings:

*In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*

In addition, the Ancient Monuments and Archaeological Areas Act 1979<sup>3</sup>, the Protection of Wrecks Act 1973<sup>4</sup>, and the Historic Buildings and Ancient Monuments Act 1953<sup>5</sup> also contain relevant statutory provisions.

Unitary councils, county councils, and district councils usually have local policies and plans, based on national guidelines, that serve to guide local priorities.

### Development within a Historic Environment

Any development within a historic environment has the potential for both *direct* and *indirect* impacts. Direct impacts can be characterised as the physical effect the development may have on heritage assets within, or immediately

1

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf).

2 <https://www.legislation.gov.uk/ukpga/1990/9/contents>.

3 <https://www.legislation.gov.uk/ukpga/1979/46/contents>.

4 <https://www.legislation.gov.uk/ukpga/1973/33/contents>.

5 <https://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents>.

adjacent to, the redline boundary. These impacts are almost always adverse, i.e. they represent the disturbance or destruction of archaeological features and deposits within the footprint of the Scheme. Indirect impacts can be characterised as the way the development affects the visual, aural, and experiential qualities (i.e. setting) of a designated heritage asset in the wider area, where the significance of that asset is at least partly derived from those qualities. These impacts can be adverse, beneficial, or neutral.

The *designated heritage assets* (see below) potentially impacted by a development are, by definition, a known quantity and, to a greater or lesser extent, their significance is appreciated and understood. In general, undesignated heritage assets of comparable value to designated assets are also readily identifiable. Nonetheless, understanding of the value and significance of the designated heritage assets must be achieved via a staged process identification and assessment in line with the relevant guidance.

In contrast, unknown archaeological assets are, by definition, unidentified, unquantified and their significance is not understood. Clear understanding of the value and significance of the archaeology must therefore be achieved via a staged process of documentary and archaeological investigation in line with the relevant guidance.

### Significance in Decision-Making

It is the determination of *significance* that is critical to assessing level of impact, whether the effect is determined to be beneficial or adverse. The PPG states: *Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent, and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals*<sup>6</sup>.

The relevant Historic England guidance is *Managing Significance in Decision-Taking in the Historic Environment*<sup>7</sup>. The following is a staged process for decision-taking, largely based on that document.

1. Identify the heritage asset(s) that might be impacted.
2. Understand the significance of the affected asset(s).
3. Understand the impact of the proposal on that significance.
4. Avoid, minimise, and mitigate impact in a way that meets the objectives of the NPPF.
5. Look for opportunities to better reveal or enhance significance.
6. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change.
7. Offset negative impacts on aspects of significance by enhancing through recording, disseminating, and archiving archaeological and historical interest of the important elements of the heritage assets affected.

In general, impact assessment addresses Steps 1-3 and 7, but may include Steps 4-6 where the required information is available from the developer/client/agent, and where design is an iterative process rather than *fait accompli*.

For designated heritage assets, which have been designated *because* they are deemed significant, Step 1 is relatively straightforward, and Step 2 is also, to a degree quantified, as the determination of significance, to a greater or lesser extent, took place then the heritage asset was designated<sup>8</sup>. For undesignated heritage of assets comparable value, or for archaeological sites that may have not been investigated (or were unknown or poorly understood prior to identification), a staged process of assessment is required (below).

Once an assessment of value and significance has been made, either by reference to designation or comparable importance if undesignated, the significance of the effect (

<sup>6</sup> <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>. Paragraph 007.

<sup>7</sup> Historic England 2015: *Managing Significance in Decision-Taking in the Historic Environment Good Practice Advice in Planning Note 2*. Paragraph 6.

<sup>8</sup> With the caveat that Listed building descriptions vary in quality between authorities, and interiors may not have been inspected.

TABLE 7) and magnitude of the impact (TABLE 8) can be determined. The former is logical and objective, the latter is a more nuanced but subjective, and the accompanying discussion provides the more narrative but subjective approach advocated by Historic England. This is a useful balance between rigid logic and nebulous subjectivity (e.g. the significance of effect on a Grade II Listed building can never be greater than moderate/large; an impact of substantial adverse is almost never achieved). This is in adherence with GPA3<sup>9</sup>.

In the NPPF, adverse impact is divided into the categories: *total loss*, *substantial harm*, and *less than substantial harm*. The bar for substantial harm was set at a very high level in 2013 by the case *Bedford BC v SSCLG38*. However, following a recent High Court action<sup>10</sup> it is possible a *major adverse impact* may now qualify as a *substantial harm*. Any lesser adverse impact will constitute a *less than substantial harm*. TABLE 9 shows how this report correlates the two systems.

It is important to state that, whereas the assessment of direct effects to archaeological sites (where the identified heritage asset falls within the footprint of the development and thus is very likely to be damaged or destroyed) is relatively straightforward, the assessment of indirect effects (where the effect is communicated by the impact on the *setting* of a heritage asset) is more nebulous and harder to convincingly predict.

In this context it is useful to remember that *setting is not itself a heritage asset, nor a heritage designation... its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance*<sup>11</sup>. Thus it is not simply the contribution to significance that is important, but also how a setting facilitates or hinders an appreciation of the significance of a heritage asset. *The contribution of setting to the significance of a heritage asset is often expressed by reference to views*<sup>12</sup>, *but ...setting is different to general amenity. Views out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting*<sup>13</sup>. Thus it is possible for views between and across heritage assets and a development to exist without there necessarily being an effect.

In addition, and as PPG states<sup>14</sup>: *The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.*

The concept of setting is explored in more detail below (see *Definitions*).

### Value and Importance

While every heritage asset, designated or otherwise, has some intrinsic merit, the act of designation creates a hierarchy of importance that is reflected by the weight afforded to their preservation and enhancement within the planning system. The system is far from perfect, impaired by an imperfect understanding of individual heritage assets, but the value system that has evolved does provide a useful guide to the *relative* importance of heritage assets. Provision is also made for heritage assets where value is not recognised through designation (e.g. undesignated 'monuments of Schedulable quality and importance' should be regarded as being of *high* value); equally, there are designated monuments and structures of *low* relative merit. TABLE 5: THE HIERARCHY OF VALUE/IMPORTANCE (BASED ON THE DMRB LA104 2020 TABLE 3.2N). TABLE 5 is taken from the current DMRB;

TABLE 6 refers back to the 2011 DRMB which more usefully defines value in relation to designation.

<sup>9</sup> Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2<sup>nd</sup> ed.). Paragraph 19.

<sup>10</sup> UK Holocaust Memorial in Victoria Tower Gardens in Westminster, reference APP/XF990/V/193240661.

<sup>11</sup> Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2<sup>nd</sup> ed.). Paragraph 9.

<sup>12</sup> Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2<sup>nd</sup> ed.). Paragraph 10. The sentiment is also expressed in the PPG glossary.

<sup>13</sup> Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2<sup>nd</sup> ed.). Paragraph 16.

<sup>14</sup> <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>. Paragraph 013.

TABLE 5: THE HIERARCHY OF VALUE/IMPORTANCE (BASED ON THE DMRB LA104 2020 TABLE 3.2N).

Value (Sensitivity) of Receptor / Resource	Typical description
Very High	Very high importance and rarity, international scale and very limited potential for substitution
High	High importance and rarity, national scale, and limited potential for substitution.
Medium	Medium or high importance and rarity, regional scale, limited potential for substitution
Low	Low or medium importance and rarity, local scale
Negligible	Very low importance and rarity, local scale.

TABLE 6: THE HIERARCHY OF VALUE/IMPORTANCE (BASED ON THE DMRB VOL.11 TABLES 5.1, 6.1 & 7.1).

Hierarchy of Value/Importance	
Very High	Structures inscribed as of universal importance as World Heritage Sites; Other buildings of recognised international importance; World Heritage Sites (including nominated sites) with archaeological remains; Archaeological assets of acknowledged international importance; Archaeological assets that can contribute significantly to international research objectives; World Heritage Sites inscribed for their historic landscape qualities; Historic landscapes of international value, whether designated or not; Extremely well-preserved historic landscapes with exceptional coherence, time-depth, or other critical factor(s).
High	Scheduled Monuments with standing remains; Grade I and Grade II* (Scotland: Category A) Listed Buildings; Other Listed buildings that can be shown to have exceptional qualities in their fabric or historical associations not adequately reflected in the Listing grade; Conservation Areas containing very important buildings; Undesignated structures of clear national importance; Undesignated assets of Schedulable quality and importance; Assets that can contribute significantly to national research objectives. Designated historic landscapes of outstanding interest; Undesignated landscapes of outstanding interest; Undesignated landscapes of high quality and importance, demonstrable national value; Well-preserved historic landscapes, exhibiting considerable coherence, time-depth or other critical factor(s).
Medium	Grade II (Scotland: Category B) Listed Buildings; Historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical associations; Conservation Areas containing buildings that contribute significantly to its historic character; Historic Townscape or built-up areas with important historic integrity in their buildings, or built settings (e.g. including street furniture and other structures); Designated or undesignated archaeological assets that contribute to regional research objectives; Designated special historic landscapes; Undesignated historic landscapes that would justify special historic landscape designation, landscapes of regional value; Averagely well-preserved historic landscapes with reasonable coherence, time-depth or other critical factor(s).
Low	Locally Listed buildings (Scotland Category C(S) Listed Buildings); Historic (unlisted) buildings of modest quality in their fabric or historical association; Historic Townscape or built-up areas of limited historic integrity in their buildings, or built settings (e.g. including street furniture and other structures); Designated and undesignated archaeological assets of local importance; Archaeological assets compromised by poor preservation and/or poor survival of contextual associations; Archaeological assets of limited value, but with potential to contribute to local research objectives; Robust undesignated historic landscapes; Historic landscapes with importance to local interest groups; Historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations.
Negligible	Buildings of no architectural or historical note; buildings of an intrusive character; Assets with very little or no surviving archaeological interest; Landscapes with little or no significant historical interest.
Unknown	Buildings with some hidden (i.e. inaccessible) potential for historic significance; The importance of the archaeological resource has not been ascertained.



TABLE 7: SIGNIFICANCE OF EFFECTS MATRIX (BASED ON DRMB LA 104 2020; ICOMOS 2011, 9-10).

	Value of Heritage Asset	Scale and Severity of Change/Impact				
		No Change	Negligible Change	Minor Change	Moderate Change	Major Change
		Significance of Effect or Overall Impact (either adverse or beneficial)				
Environmental Value (Sensitivity)	WHS sites that convey OUV	Neutral	Slight	Moderate/Large	Large/Very Large	Very Large
	Very High	Neutral	Slight	Moderate/Large	Large/Very Large	Very Large
	High	Neutral	Slight	Moderate/Slight	Moderate/Large	Large/Very Large
	Medium	Neutral	Neutral/Slight	Slight	Moderate	Moderate/Large
	Low	Neutral	Neutral/Slight	Neutral/Slight	Slight	Slight/Moderate
	Negligible	Neutral	Neutral	Neutral/Slight	Neutral/Slight	Slight

TABLE 8: MAGNITUDE OF IMPACT (BASED ON DMRB LA 104 2020 TABLE 3.4N).

Magnitude of Impact (Change)		Typical Description
Major	Adverse	Loss of resource and/or quality and integrity of resource; severe damage to key characteristics, features, or elements.
	Beneficial	Large scale or major improvement of resource quality; extensive restoration; major improvement of attribute quality.
Moderate	Adverse	Loss of resource, but not adversely affecting the integrity; partial loss of/damage to key characteristics, features or elements.
	Beneficial	Benefit to, or addition of, key characteristics, features, or elements; improvement of attribute quality.
Minor	Adverse	Some measurable change in attributes, quality, or vulnerability; minor loss of, or alteration to, one (maybe more) key characteristics, features, or elements.
	Beneficial	Minor benefit to, or addition of, one (maybe more) key characteristics, features, or elements; some beneficial impact on attribute or a reduced risk of negative impact occurring.
Negligible	Adverse	Very minor loss or detrimental alteration to one or more characteristics, features, or elements.
	Beneficial	Very minor benefit to or positive addition of one or more characteristics, features, or elements.
No change		No loss or alteration of characteristics, features, or elements; no observable impact in either direction.

TABLE 9: SCALES OF IMPACT AS PER THE NPPF, RELATED TO TABLE 8.

Scale of Impact		
No Change	<i>Neutral</i>	No impact on the heritage asset.
Less than Substantial Harm	<i>Negligible Adverse</i>	Where the developments may be visible or audible but would not affect the heritage asset or its setting, due to the nature of the asset, distance, topography, or local blocking.
	<i>Minor Adverse</i>	Where the development would have an effect on the heritage asset or its setting, but that effect is restricted due to the nature of the asset, distance, or screening from other buildings or vegetation.
	<i>Moderate Adverse</i>	Where the development would have a pronounced impact on the heritage asset or its setting, due to the sensitivity of the asset and/or proximity. The effect may be ameliorated by screening or mitigation.
Substantial Harm	<i>Substantial Adverse</i>	Where the development would have a severe and unavoidable effect on the heritage asset or its setting, due to the particular sensitivity of the asset and/or close physical proximity. Screening or mitigation could not ameliorate the effect of the development in these instances.
Total Loss	<i>Total Loss</i>	The heritage asset is destroyed.

### Staged Investigation – Direct Impact

The staged approach for the assessment of direct impacts references the publication *Significance in Decision-Taking in the Historic Environment*<sup>15</sup>. The aim of this assessment is to establish the *archaeological baseline* for the site and determine the likely significance of the archaeological resource. This staged approach starts with desk-based assessment<sup>16</sup>, may conclude with intrusive investigations, and may reference some or all of the following:

1. Documentary research (published works, primary and secondary sources in record offices).
2. Existing archaeological reports or surveys for the site.

<sup>15</sup> Historic England 2015: *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning Note 2.*

<sup>16</sup> CfA 2014 updated 2020: *Standard and guidance for historic environment desk-based assessment.*

3. Historic maps.
4. Archaeological research (historic environment records (HER), event records (HER), Historic England National List; Portable Antiquity Scheme (PLS) records, grey literature reports (available from the Archaeological Data Service).
5. Historic Landscape Characterisation (HLC).
6. Aerial photography (National Mapping Programme, historic aerial photographs (Historic England, Cambridge, Britain from Above), recent commercial photography (Google Earth)).
7. LiDAR analysis (Environment Agency data, TELLUS data).
8. Oral testimony.
9. Walkover survey (or for historic buildings, a historic building appraisal<sup>17</sup>).
10. Geophysical survey, if suitable (magnetometry, electrical resistance, ground-penetrating radar)<sup>18</sup>.
11. Archaeological trench evaluation<sup>19</sup>, if appropriate.

Following the conclusion of this staged process, an assessment of the archaeological potential of the site is produced and (if appropriate) recommendations made, including for further investigation, analysis, and publication to be undertaken, as mitigation for the proposed development. This document will normally only cover Items 1-10.

### Type of Impact

Developments can readily be divided into several phases which are marked by different types and level of impact. However, the only one relevant to direct impact is the *construction phase*. Construction works have direct, physical effects on the buried archaeology of a site. Direct effects may extend beyond the nominal footprint of a site e.g. where related works or site compounds are located off-site. *Operational* and *decommissioning* phases are only relevant where elements of the buried archaeological resource survive, but in most instances (excluding PV sites and wind turbines), these impacts are permanent and irreversible.

### Staged Investigation – Indirect Impact

The staged approach for the assessment of indirect impacts references the *Setting of Heritage Assets*<sup>20</sup>. The aim of this assessment is to identify the designated heritage assets outside the redline boundary that might be impacted upon by the proposed development, determine if an effect on their significance via setting is possible, and establish the level of impact. The staged approach advocated by GPA3 contains the following steps<sup>21</sup>:

1. Identify which heritage assets and their settings are affected.
2. Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.
3. Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it.
4. Explore ways to maximise enhancement and avoid or minimise harm.
5. Make and document the decision and monitor outcomes.

*Step one* is to identify the designated heritage assets that might be affected by the development. The first stage of that process is to determine an appropriate search radius, and this would vary according to the height, size and/or prominence of the proposed development. For instance, the search radius for a wind turbine, as determined by its height and dynamic character, would be much larger than for a single house plot or small agricultural building. For this assessment, the second part of the process is to examine the heritage assets within the search radius and assign them to one of three categories:

- Category #1 assets: Where proximity to the proposed development, the significance of the heritage asset concerned, or the likely magnitude of impact, demands detailed consideration.
- Category #2 assets: Assets where location and current setting would indicate that the impact of the proposed development is likely to be limited, but some uncertainty remains.

<sup>17</sup> Historic England 2016: *Understanding Historic Buildings: A Guide to Good Recording Practice*.

<sup>18</sup> ClfA 2014 updated 2020: *Standard and guidance for archaeological geophysical survey*. Schmidt, A., Linford, P. Linford, N. David, A. Gaffney, C., Sarris, A. & Fassbinder, J. 2016: *EAC Guidelines for the Use of Geophysics in Archaeology*.

<sup>19</sup> ClfA 2014 updated 2020: *Standard and guidance for archaeological field evaluation*.

<sup>20</sup> Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2<sup>nd</sup> ed.). Paragraph 9.

<sup>21</sup> Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2<sup>nd</sup> ed.). Paragraph 9.

- Category #3 assets: Assets where location, current setting, significance would strongly indicate the impact would be no higher than negligible and detailed consideration both unnecessary and disproportionate. These assets are scoped out of the assessment but may still be listed in the impact summary table.

Dependant on the nature of the development, this work may be informed, but not governed, by a generated ZTV (zone of theoretical visibility).

Pursuant to *Steps Two and Three*, a series of site visits are made to the designated heritage assets of Categories #1 and #2. Each asset is considered separately and appraised on its significance, condition, and setting/context by the assessor. The potential impacts the development are assessed for each location, taking into account site-specific factors and the limitations of that assessment (e.g. no access, viewed from the public road etc.). Photographic and written records are compiled during these visits. If a ZTV has been used in the assessment, the accuracy of the ZTV is corroborated with reference to field observations.

*Step 4* is possible where the required information is available from the developer/client/agent, and where design is an iterative process rather than *fait accompli*. In many instances, adverse outcomes (and more rarely, beneficial outcomes) are unavoidable, as mitigation would have to take place at the heritage asset concerned or within an intervening space, and not the proposed site itself.

Assessment and documentation, *Step 5*, takes place within this document. The individual asset tables are completed for each assessed designated heritage asset, and, with an emphasis on practicality and proportionality,<sup>22</sup> assets are grouped by category (e.g. churches, historic settlements, funerary remains etc.) and provided with a generic preamble that avoids repetitious narrative. This initial preamble establishes the baseline sensitivity of a given category of monument or building to the potential effect; the individual entries that follow then elaborate on local circumstance and site-specific factors. The individual assessments are to be read in conjunction with the overall discussion, as the assessment of impact is reflection of both.

As discussed (elsewhere, this document), the critical assessment is to determine the contribution of setting to the significance of the heritage asset, and/or the ability of the setting to facilitate an appreciation of that significance. Views are important but not paramount, and views to and from a proposed development can exist without adverse effect. Some assets are intrinsically more sensitive to change in their environment than others; a useful shorthand for this can be found in TABLE 10.

TABLE 10: IMPORTANCE OF SETTING TO INTRINSIC SIGNIFICANCE.

Importance of Setting to the Significance of the Asset	
Paramount	Examples: Round barrow; follies, eye-catchers, stone circles
Integral	Examples: Hillfort; country houses
Important	Examples: Prominent church towers; war memorials
Incidental	Examples: Thatched cottages
Irrelevant	Examples: Milestones

### Type of Impact

Developments can readily be divided into several phases which are marked by different types and level of impact: the *construction phase*, the *operational phase*, and the *decommissioning phase*. In most instances, impacts are impermanent and reversible, as a turbine can be dismantled, a tower block demolished, or trees may grow up to screen an ugly elevation.

#### Construction Phase

Construction works have direct, physical effects on the buried archaeology of a site, and a pronounced but indirect effect on neighbouring properties. Direct effects may extend beyond the nominal footprint of a site e.g. where related works or site compounds are located off-site. Indirect effects are both visual and aural, and may also affect air quality, water flow and traffic in the local area.

#### Operational Phase

The operational phase of a development is either temporary (e.g. wind turbine or mobile phone mast) or effectively permanent (housing development or road scheme). The effects at this stage are largely indirect and can be partly mitigated over time through design and/or planting. Large development can have an effect on historic landscape

<sup>22</sup> Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2<sup>nd</sup> ed.). Paragraphs 2, 17, 19, 21, 23, 41.

character, as they transform areas from one character type (e.g. agricultural farmland) into another (e.g. suburban).

#### *Decommissioning Phase*

Relevant to wind turbines and PV sites, less relevant to other forms of development. These impacts would be similar to those of the construction phase.

#### *Group Assessment*

Individual assessments give some indication as to how a development may affect a particular cottage, historic park, or hillfort, but collective assessment are also necessary, reflecting the effect on the historic environment in general.

#### *Cumulative Impact*

A single development will have a direct physical and an indirect visual impact, but a second and a third site in the same area will have a synergistic and cumulative impact above and beyond that of a single site. PPG states<sup>23</sup>: *When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.*

GPA3 states<sup>24</sup>: *Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it.*

However, the cumulative impact of a proposed development can be difficult to determine, as consideration must be given to consented and pre-determination proposals as well as operational or occupied sites.

#### *Aggregate Impact*

A single development will usually affect multiple individual heritage assets. In this assessment, the term *aggregate impact* is used to distinguish this from cumulative impact. In essence, this is the impact on the designated parts of the historic environment as a whole, rather than multiple developments on a single asset.

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<sup>23</sup> <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>. Paragraph 013.

<sup>24</sup> Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2<sup>nd</sup> ed.). Paragraph 9.3.



## Definitions

### Heritage Assets

The NPPF Glossary defines heritage assets as: *A building, monument, site, place, area, or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)*<sup>25</sup>. This is a fairly broad definition for an expanding range of features, as what is considered of little heritage interest today may – due to location, rarity, design, associations, etc. – be considered of heritage value in the future.

### Significance

The NPPF Glossary defines significance as: *The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic, or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting*<sup>26</sup>.

### Conservation Principles

In making an assessment, this report adopts the conservation values (*evidential, historical, aesthetic and communal*) laid out in the English Heritage 2008 publication *Conservation Principles*<sup>27</sup>. These are used to determine and express the relative importance of a given heritage asset. The definition of those terms is summarised below:

#### Evidential Value

Evidential value (or research potential) is derived from the potential of a structure or site to provide physical evidence about past human activity and may not be readily recognised or even visible. This is the primary form of data for periods without adequate written documentation. However, it is an assessment of *potential* – known value falls under the umbrella of historical value (below).

#### Historical Value

*Historical value* (narrative) is derived from the ways in which past people, events and aspects of life can be connected via a place to the present; it can be illustrative or associative.

Illustrative value is the visible expression of evidential value; it has the power to aid interpretation of the past through making connections with, and providing insights into, past communities and their activities through a shared experience of place. Illustrative value tends to be greater if a place features the first or only surviving example of a particular innovation of design or technology.

Associative value arises from a connection to a notable person, family, event or historical movement. It can intensify understanding by linking the historical past to the physical present, always assuming the place bears any resemblance to its appearance at the time. Associational value can also be derived from known or suspected links with other monuments (e.g. barrow cemeteries, church towers) or cultural affiliations (e.g. Methodism).

Buildings and landscapes can also be associated with literature, art, music or film, and this association can inform and guide responses to those places.

Historical value depends on sound identification and the direct experience of physical remains or landscapes. Authenticity can be strengthened by change, being a living building or landscape, and historical values are harmed only where adaptation obliterates or conceals them. The appropriate use of a place – e.g. a working mill, or a church for worship – illustrates the relationship between design and function and may make a major contribution to historical value. Conversely, cessation of that activity – e.g. conversion of farm buildings to holiday homes – may essentially destroy it.

#### Aesthetic Value

Aesthetic value (emotion) is derived from the way in which people draw sensory and intellectual stimulation from a place or landscape. Value can be the result of *conscious design*, or the *fortuitous outcome* of landscape evolution; many places combine both aspects, often enhanced by the passage of time.

<sup>25</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>.

<sup>26</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>.

<sup>27</sup> English Heritage 2008: *Conservation Principles: policies and guidance for the sustainable management of the historic environment*.

Design value relates primarily to the aesthetic qualities generated by the conscious design of a building, structure, or landscape; it incorporates composition, materials, philosophy, and the role of patronage. It may have associational value, if undertaken by a known architect or landscape gardener, and its importance is enhanced if it is seen as innovative, influential or a good surviving example. Landscape parks, country houses and model farms all have design value. The landscape is not static, and a designed feature can develop and mature, resulting in the 'patina of age'.

Some aesthetic value developed fortuitously over time as the result of a succession of responses within a particular cultural framework e.g. the seemingly organic form of an urban or rural landscape or the relationship of vernacular buildings and their materials to the landscape. Aesthetic values are where a proposed development usually has their most pronounced impact: the indirect effects of most developments are predominantly visual or aural and can extend many kilometres from the site itself. In many instances the impact of a development is incongruous, but that is itself an aesthetic response, conditioned by prevailing cultural attitudes to what the historic landscape should look like.

#### *Communal Value*

Communal value (togetherness) is derived from the meaning a place holds for people and may be closely bound up with historical/associative and aesthetic values; it can be commemorative, symbolic, social, or spiritual.

Commemorative and symbolic value reflects the meanings of a place to those who draw part of their identity from it, or who have emotional links to it e.g. war memorials. Some buildings or places (e.g. the Palace of Westminster) can symbolise wider values. Other places (e.g. Porton Down Chemical Testing Facility) have negative or uncomfortable associations that nonetheless have meaning and significance to some and should not be forgotten. Social value need not have any relationship to surviving fabric, as it is the continuity of function that is important. Spiritual value is attached to places and can arise from the beliefs of a particular religion or past or contemporary perceptions of the spirit of place. Spiritual value can be ascribed to places sanctified by hundreds of years of veneration or worship, or wild places with few signs of modern life. Value is dependent on the perceived survival of historic fabric or character and can be very sensitive to change. The key aspect of communal value is that it brings specific groups of people together in a meaningful way.

#### *Significance in the NPPF*

The NPPF operates on a slightly differently set of criteria to the Conservation Principles, a divergent trajectory that will doubtless be addressed when the Conservation Principles are revised. Under the NPPF, value is expressed as *archaeological interest*, *architectural and artistic interest*, and *historic interest*. The following is taken from the NPPF PPG<sup>28</sup> document, followed by commentary:

#### *Archaeological Interest*

*As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.* This interest most closely accords with evidential value. While it usefully extends that definition to include known elements, the emphasis on *archaeological* interest unhelpfully seems to preclude the built environment.

#### *Architectural and Artistic Interest*

*These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.* This interest most closely accords with aesthetic value, but the use of the term *architectural* seems prejudiced against vernacular forms of built heritage, and fortuitous aesthetics.

#### *Historic Interest*

*An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.* This interest most closely accords with historical value, and extends to include communal value, though with diminished emphasis.

### Concepts from World Heritage Guidance

<sup>28</sup> <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>. Paragraph 006.

World Heritage Sites are assessed with reference to their own, non-statutory, guidance<sup>29</sup>. This includes the useful concepts of *authenticity* and *integrity*<sup>30</sup>.

### Authenticity

Authenticity is the ability of a property to convey the attributes of the outstanding universal value of the property. *The ability to understand the value attributed to the heritage depends on the degree to which information sources about this value may be understood as credible or truthful.* Outside of a World Heritage Site, authenticity may usefully be employed to convey the sense a place or structure is a truthful representation of the thing it purports to portray. Converted farm buildings, for instance, survive in good condition, but are drained of the authenticity of a working farm environment.

### Integrity

Integrity is the measure of wholeness or intactness of the cultural heritage and its attributes. Outside of a World Heritage Site, integrity can be taken to represent the survival and condition of a structure, monument, or landscape. The intrinsic value of those examples that survive in good condition is undoubtedly greater than those where survival is partial, and condition poor.

### Designated Heritage Assets

The majority of the most important ('nationally important') heritage assets are protected through *designation*, with varying levels of statutory protection. These assets fall into one of six categories, although designations often overlap, so a Listed early medieval cross may also be Scheduled, lie within the curtilage of Listed church, inside a Conservation Area, and on the edge of a Registered Park and Garden that falls within a world Heritage Site. The NPPF Glossary defines a designated heritage asset as: *A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation*<sup>31</sup>.

### Listed Buildings

A Listed building is an occupied dwelling or standing structure which is of special architectural or historical interest. These structures are found on the *Statutory List of Buildings of Special Architectural or Historic Interest*. The status of Listed buildings is applied to 300,000-400,000 buildings across the United Kingdom. Recognition of the need to protect historic buildings began after the Second World War, where significant numbers of buildings had been damaged in the county towns and capitals of the United Kingdom. Buildings that were considered to be of 'architectural merit' were included. The Inspectorate of Ancient Monuments supervised the collation of the list, drawn up by members of two societies: The Royal Institute of British Architects and the Society for the Protection of Ancient Buildings. Initially the lists were only used to assess which buildings should receive government grants to be repaired and conserved if damaged by bombing. The *Town and Country Planning Act 1947* formalised the process within England and Wales, Scotland and Ireland following different procedures. Under the 1979 *Ancient Monuments and Archaeological Areas Act* a structure cannot be considered a Scheduled Monument if it is occupied as a dwelling, making a clear distinction in the treatment of the two forms of heritage asset. Any alterations or works intended to a Listed Building must first acquire Listed Building Consent, as well as planning permission. Further phases of 'listing' were rolled out in the 1960s, 1980s and 2000s; English Heritage advise on the listing process and administer the procedure, in England, as with the Scheduled Monuments.

Some exemption is given to buildings used for worship where institutions or religious organisations (such as the Church of England) have their own permissions and regulatory procedures. Some structures, such as bridges, monuments, military structures, and some ancient structures may also be Scheduled as well as Listed. War memorials, milestones and other structures are included in the list, and more modern structures are increasingly being included for their architectural or social value.

Buildings are split into various levels of significance: Grade I (2.5% of the total) representing buildings of exceptional (international) interest; Grade II\* (5.5% of the total) representing buildings of particular (national) importance; Grade II (92%) buildings are of merit and are by far the most widespread. Inevitably, accuracy of the Listing for individual structures varies, particularly for Grade II structures; for instance, it is not always clear why some 19<sup>th</sup> century farmhouses are Listed while others are not, and differences may only reflect local government boundaries, policies and

<sup>29</sup> ICOMOS 2011: *Guidance on Heritage Impact Assessment for Cultural World Heritage Properties: a publication of the international Council on Monuments and Sites.*

<sup>30</sup> UNESCO 2021: *Operational Guidelines for the Implementation of the World Heritage Convention.* Paragraphs 79-95.

<sup>31</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>.

individuals.

Other buildings that fall within the curtilage of a Listed building are afforded some protection as they form part of the essential setting of the designated structure, e.g. a farmyard of barns, complexes of historic industrial buildings, service buildings to stately homes etc. These can be described as having *group value*.

### Conservation Areas

Local authorities are obliged to identify and delineate areas of special architectural or historic interest as Conservation Areas, which introduces additional controls and protection over change within those places. Usually, but not exclusively, they relate to historic settlements, and there are c.7000 Conservation Areas in England.

### Scheduled Monuments

In the United Kingdom, a Scheduled Monument is considered an historic building, structure (ruin), or archaeological site of national importance. Various pieces of legislation, under planning, conservation, etc., are used for legally protecting heritage assets given this title from damage and destruction; such legislation is grouped together under the term 'designation', that is, having statutory protection under the *Ancient Monuments and Archaeological Areas Act 1979*. A heritage asset is a part of the historic environment that is valued because of its historic, archaeological, architectural or artistic interest; those of national importance have extra legal protection through designation. Important sites have been recognised as requiring protection since the late 19<sup>th</sup> century, when the first 'schedule' or list of monuments was compiled in 1882. The conservation and preservation of these monuments was given statutory priority over other land uses under this first schedule. County Lists of the monuments are kept and updated by the Department for Culture, Media and Sport. In the later 20<sup>th</sup> century sites are identified by English Heritage (one of the Government's advisory bodies) of being of national importance and included in the schedule. Under the current statutory protection any works required on or to a designated monument can only be undertaken with a successful application for Scheduled Monument Consent.

### Registered Parks and Gardens

Culturally and historically important 'man-made' or 'designed' landscapes, such as parks and gardens are currently "listed" on a non-statutory basis, included on the 'Register of Historic Parks and Gardens of special historic interest in England' which was established in 1983 and is, like Listed Buildings and Scheduled Monuments, administered by Historic England. Sites included on this register are of national importance, many associated with stately homes of Grade II\* or Grade I status. Emphasis is laid on 'designed' landscapes, not the value of botanical planting. Sites can include town squares and private gardens, city parks, cemeteries and gardens around institutions such as hospitals and government buildings. Planned elements and changing fashions in landscaping and forms are a main focus of the assessment.

### Registered Battlefields

Battles are dramatic and often pivotal events in the history of any people or nation. Since 1995 Historic England maintains a register of 46 battlefields in order to afford them a measure of protection through the planning system. The key requirements for registration are battles of national significance, a securely identified location, and its topographical integrity – the ability to 'read' the battle on the ground.

### World Heritage Sites

Arising from the UNESCO World Heritage Convention in 1972, Article 1 of the Operational Guidelines (2015, no.49) states: 'Outstanding Universal Value means cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity'. These sites are recognised at an international level for their intrinsic importance to the story of humanity, and should be accorded the highest level of protection within the planning system.

### Setting

The assessment of direct effects to archaeological sites (where the identified heritage asset falls within the footprint of a development and thus is very likely to be damaged or destroyed) is relatively straightforward, the assessment of indirect effects (where the effect is communicated via impact on the *setting* of a heritage asset) is more nebulous and harder to convincingly predict.

The NPPF Glossary defines the setting of a heritage asset as: *The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive*



or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral<sup>32</sup>.

The principal guidance on this topic is contained within one publication: *The Setting of Heritage Assets: Good Practice Advice* 3<sup>33</sup>. Where the impact of a proposed development is largely indirect, the importance of the setting to the significance of the heritage asset becomes the primary consideration of the impact assessment. The following extracts are from GPA3<sup>34</sup>:

*The NPPF makes it clear that the extent of the setting of a heritage asset 'is not fixed and may change as the asset and its surroundings evolve'. Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated (see below Designed settings). Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.*

*While setting can be mapped in the context of an individual application or proposal, it cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time, and because new information on heritage assets may alter what might previously have been understood to comprise their setting and the values placed on that setting and therefore the significance of the heritage asset.*

There are two ways in which change within the setting of a heritage asset may affect its significance:

- Where the setting of the heritage asset contributes to the significance of the heritage asset (e.g. the historic park around the stately home; the historic streetscape to the Listed shopfronts).
- Where the setting contributes to the ability to appreciate the significance of the heritage asset (e.g. clear views to a principal façade; well-kept garden to a Listed cottage).

GPA3 states: *The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place...*<sup>35</sup> *The Setting of Heritage Assets*<sup>36</sup> lists a number of instances where views contribute to the particular significance of a heritage asset:

- Those where the composition within the view was a fundamental aspect of the design or function of the heritage asset.
- Those where town- or village-scape reveals views with unplanned or unintended beauty.
- Those with historical associations, including viewing points and the topography of battles.
- Those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected.
- Those where relationships between the asset and other heritage assets or natural features or phenomena such as solar or lunar events are particularly relevant.
- Those assets, whether contemporaneous or otherwise, which were intended to be seen from one another for aesthetic, functional, ceremonial, or religious reasons, including military and defensive sites, telegraphs or beacons, prehistoric funerary and ceremonial sites, historic parks and gardens with deliberate links to other designed landscapes and remote 'eye-catching' features or 'borrowed' landmarks beyond the park boundary.

However, as stated in PPG<sup>37</sup>: *Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.*

<sup>32</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>.

<sup>33</sup> Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2<sup>nd</sup> ed.).

<sup>34</sup> Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2<sup>nd</sup> ed.). Paragraphs 8, 9.

<sup>35</sup> Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2<sup>nd</sup> ed.). Paragraph 10.

<sup>36</sup> Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2<sup>nd</sup> ed.). Paragraph 11.

<sup>37</sup> <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#assess-substantial-harm>. Paragraph 013.

Furthermore, as stated in GPA3<sup>38</sup>: *Similarly, setting is different from general amenity. Views out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting.*

These documents make it clear that views to, from, or including, a heritage asset can be irrelevant to a consideration of setting, where those views do not contribute to either the significance of the asset, or an ability to appreciate its significance.

In addition, visibility alone is no clear guide to visual impact. People perceive size, shape and distance using many cues, so context is critically important. For instance, research on electricity pylons<sup>39</sup> has indicated scenic impact is influenced by landscape complexity: the visual impact of pylons is less pronounced within complex scenes, especially at longer distances, presumably because they are less of a focal point and the attention of the observer is diverted. There are many qualifiers that serve to increase or decrease the visual impact of a proposed development, some of which are seasonal or weather-related.

Thus, the principal consideration of assessment of indirect effects cannot be visual impact *per se*. It is an assessment of the likely magnitude of effect, the importance of setting to the significance of the heritage asset, and the sensitivity of that setting to the visual or aural intrusion of the proposed development.

GPA3 also details other area concepts that exist in parallel to, but separate from, setting. These are *curtilage*, *historic character*, and *context*<sup>40</sup>.

#### *Curtilage*

*Curtilage is a legal term describing an area around a building and, for listed structures, the extent of curtilage is defined by consideration of ownership, both past and present, functional association and layout. The setting of a heritage asset will include, but generally be more extensive than, its curtilage.* The concept of curtilage is relevant to Listed Building Consent, and where development occurs within the immediate surroundings of the Listed structure.

#### *Historic Character*

*The historic character of a place is the group of qualities derived from its past uses that make it distinctive. This may include: its associations with people, now and through time; its visual aspects; and the features, materials, and spaces associated with its history, including its original configuration and subsequent losses and changes. Character is a broad concept, often used in relation to entire historic areas and landscapes, to which heritage assets and their settings may contribute.* The concept of character area<sup>41</sup> can be relevant to developments where extensive areas designations (Registered Parks and Gardens, Registered Battlefields, Conservation Areas, and World Heritage Sites; also towns and larger villages) are divisible into distinct character areas that a development may impact differently due to proximity, visibility etc.

#### *Context*

*The context of a heritage asset is a non-statutory term used to describe any relationship between it and other heritage assets, which is relevant to its significance, including cultural, intellectual, spatial or functional. Contextual relationships apply irrespective of distance, sometimes extending well beyond what might be considered an asset's setting, and can include the relationship of one heritage asset to another of the same period or function, or with the same designer or architect. A range of additional meanings is available for the term 'context', for example in relation to archaeological context and to the context of new developments, as well as customary usages. Setting may include associative relationships that are sometimes referred to as 'contextual'.* This concept is a useful, though non-statutory one, as heritage assets may have a relationship with the surrounding landscape that is non-visual and based e.g. on their historical economy. This can be related to landscape context (below), but which is a physically deterministic relationship.

#### *Landscape Context*

<sup>38</sup> Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2<sup>nd</sup> ed.). Paragraph 16.

<sup>39</sup> Hull, R.B. & Bishop, I.D. 1988: 'Scenic Impacts of Electricity Transmission Towers: the influence of landscape types and observer distance', *Journal of Environmental Management* 27, 99-108.

<sup>40</sup> Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2<sup>nd</sup> ed.). Paragraph 7.

<sup>41</sup> Historic England 2017: *Understanding Place: Historic Area Assessments*.

The determination of *landscape context* is an important part of the assessment process. This is the physical space within which any given heritage asset is perceived and experienced. The experience of this physical space is related to the scale of the landform and modified by cultural and biological factors like field boundaries, settlements, trees, and woodland. Together, these contribute to local character and extent of the setting.

Landscape context is based on topography and can vary in scale from the very small – e.g. a narrow valley where views and vistas are restricted – to the very large – e.g. wide valleys or extensive upland moors with 360° views. Where very large landforms are concerned, a distinction can be drawn between the immediate context of an asset (this can be limited to a few hundred metres or less, where cultural and biological factors impede visibility and/or experience), and the wider context (i.e. the wider landscape within which the asset sits).

When new developments are introduced into a landscape, proximity alone is not a guide to magnitude of effect. Dependant on the nature and sensitivity of the heritage asset, the magnitude of effect is potentially much greater where the proposed development is to be located within the landscape context of a given heritage asset. Likewise, where the proposed development would be located outside the landscape context of a given heritage asset, the magnitude of effect would usually be lower. Each case is judged on its individual merits, and in some instances the significance of an asset is actually greater outside of its immediate landscape context, for example, where church towers function as landmarks in the wider landscape.

#### *Principal Views, Landmark Assets, and Visual Impact*

Further to the consideration of views (above), historic and significant views are the associated and complementary element to setting, but can be considered separately as developments may appear in a designed view without necessarily falling within the setting of a heritage asset *per se*. As such, significant views fall within the aesthetic value of a heritage asset and may be *designed* (i.e. deliberately conceived and arranged, such as within parkland or an urban environment) or *fortuitous* (i.e. the graduated development of a landscape ‘naturally’ brings forth something considered aesthetically pleasing, or at least impressive, as with particular rural landscapes or seascapes), or a combination of both (i.e. the *patina of age*).

On a landscape scale views, taken in the broadest sense, are possible from anywhere to anything, and each may be accorded an aesthetic value according to subjective taste (this is the *amenity value* of views<sup>42</sup>). Given that terrain, the biological and built environment, and public access restrict our theoretical ability to see anything from anywhere, in this assessment the term *principal view* is employed to denote both the deliberate views created within designed landscapes, and those fortuitous views that may be considered of aesthetic value and worth preserving, where they contribute to significance.

It should be noted, however, that there are distance thresholds beyond which perception and recognition fail, and this is directly related to the scale, height, massing, and nature of the heritage asset in question. For instance, beyond 2km the Grade II cottage comprises a single indistinct component within the wider historic landscape, whereas at 5km or even 10km a large stately home or castle may still be recognisable. By extension, where assets cannot be seen or recognised i.e. entirely concealed within woodland, or too distant to be distinguished, then visual harm to setting is moot. To reflect this emphasis on recognition, the term *landmark asset* is employed to denote those sites where the structure (e.g. church tower), remains (e.g. earthwork ramparts) or – in some instances – the physical character of the immediate landscape (e.g. a distinctive landform like a tall domed hill) make them visible on a landscape scale. In some cases, these landmark assets may exert landscape *primacy*, where they are the tallest or most obvious man-made structure within line-of-sight. However, this is not always the case, typically where there are numerous similar monuments (multiple engine houses in mining areas, for instance) or where modern developments have overtaken the heritage asset in height and/or massing.

Where a new development has the potential to *visually dominate* a heritage asset, even if the contribution of setting to the significance of a heritage asset is minimal, it is likely to impact on the ability of setting to facilitate an appreciation of the heritage asset in question and can be regarded as an adverse effect.

Visibility alone is not a clear guide to visual impact. People perceive size, shape and distance using many cues, so context is critically important. For instance, research on electricity pylons (Hull & Bishop 1988) has indicated scenic impact is influenced by landscape complexity: the visual impact of pylons is less pronounced within complex scenes, especially at

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<sup>42</sup> Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2<sup>nd</sup> ed.). Paragraphs 14-16.

longer distances, presumably because they are less of a focal point and the attention of the observer is diverted. There are many qualifiers that serve to increase or decrease the visual impact of a proposed development (see TABLE 11), some of which are seasonal or weather-related.



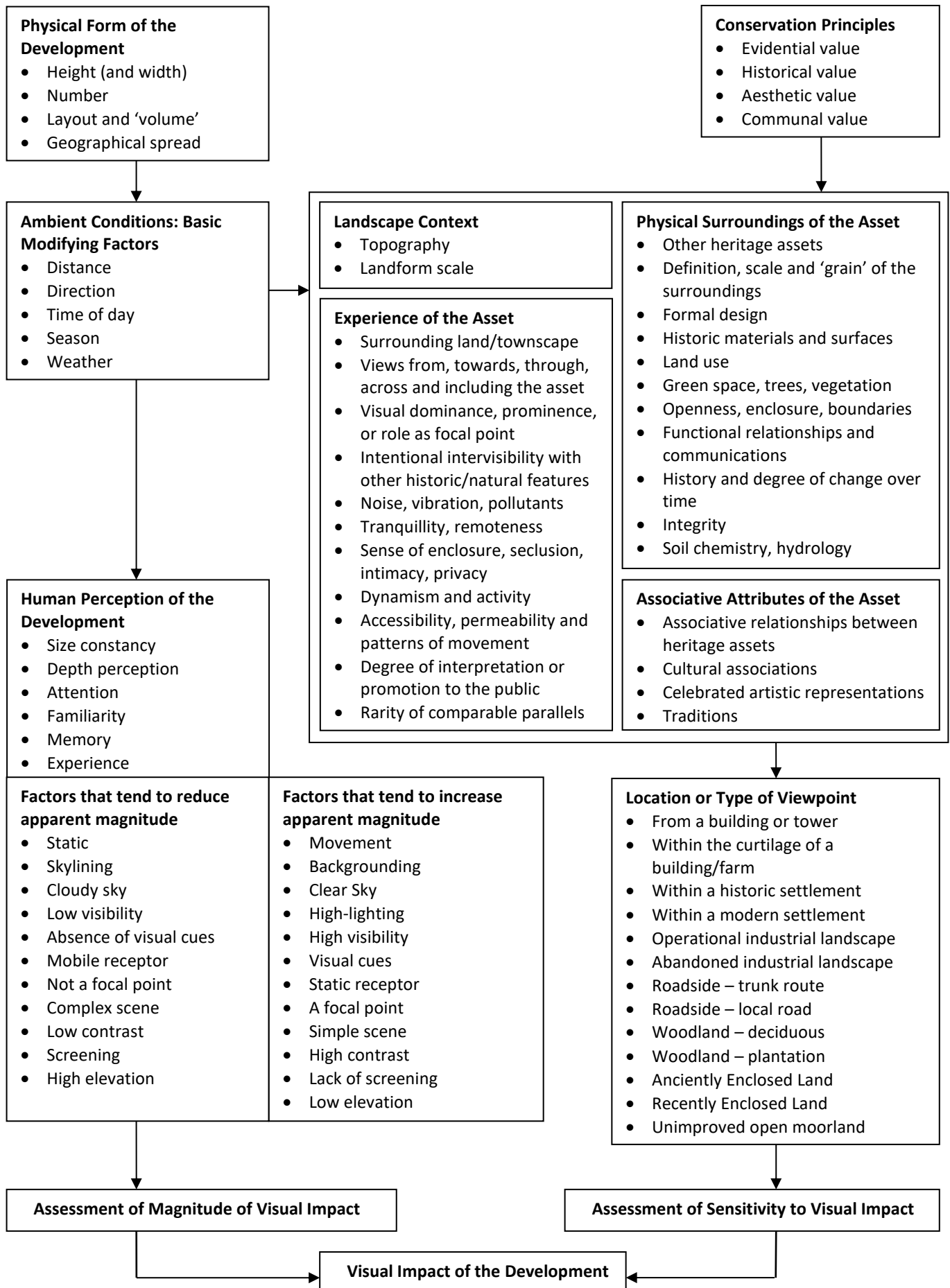


TABLE 11: THE CONCEPTUAL MODEL FOR VISUAL IMPACT ASSESSMENT PROPOSED BY THE UNIVERSITY OF NEWCASTLE (2002, 63), MODIFIED TO INCLUDE ELEMENTS OF ASSESSMENT STEP 2 FROM THE SETTING OF HERITAGE ASSETS (HISTORIC ENGLAND 2017, 11, 13).



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