

**LAND ABOVE LADIES BEACH  
GRANVILLE ROAD  
ILFRACOMBE  
DEVON**

Results of a Heritage Impact Assessment



South West Archaeology Ltd. report no. 221208



[www.swarch.net](http://www.swarch.net)

Tel. 01769 573555  
01872 223164

# Land above Ladies Beach, Granville Road, Ilfracombe, Devon

## Results of a Heritage Impact Assessment

---

By F. Balmond, MCI(A) and P. Webb  
Report Version: FINAL  
Draft Issued: 15<sup>th</sup> December 2022  
Report Finalised: 10<sup>th</sup> February 2023

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

### SUMMARY

---

*This report presents the results of a heritage impact assessment carried out by South West Archaeology Ltd. (SWARCH) for a proposed single residential development at land above Ladies Beach, Granville Road, Ilfracombe, Devon.*

*The site lies on a cliff top location to the north-west of the main settlement of Ilfracombe, north of Granville Road. Ilfracombe is an ancient sea port and market town built at the foot of a steep upward slope. It derives its name from a personal name 'Aelfred' and the old English element 'cumb' meaning coombe or valley. The parish of Ilfracombe is bordered by Berrynarbor, Bittadon, West Down and Morteheo. Historically the parish lay within the Braunton Hundred and the ecclesiastical Deanery of Shirwell. The manor of Ilfracombe formed part of the barony of Barnstaple and passed through the Martin and Audley families to the Bouchiers. The population of the town increased fivefold from the time of the initial census in 1838 to 8557 in 1901, illustrating the rate at which the town grew during the 19<sup>th</sup> century.*

*The proposal site appears to have been part of a large pastoral field at the beginning of the 19<sup>th</sup> century. It was subdivided by the end of the 19<sup>th</sup> century and divided again by a new road at the beginning of the 20<sup>th</sup> century as the development of Ilfracombe as a Victorian seaside tourist destination pushed development further out from its historic linear core. Very little archaeological work has taken place in the vicinity of the site. As much of the development of Ilfracombe took place in the Victorian period it is likely any archaeological remains were not noted.*

*An inspection of the site identified a small number of earthwork features, including banks, terraces and platforms; and whilst none can at this stage be verified or dated, many of these features are likely to be recent in date (associated with episodes of landscaping), though the banks may be older.*

*The overall impact of the proposed development can be assessed as **Slight Adverse**. Recommendations and proposed mitigation measures have been made as part of this assessment. The impact of the development on any buried archaeological resource would be **permanent** though the potential for encountering any archaeological features or deposits is unknown but considered unlikely given modern landscaping.*

---



February 2023

South West Archaeology Ltd. shall retain the copyright of any commissioned reports, tender documents or other project documents, under the Copyright, Designs and Patents Act 1988 with all rights reserved, excepting that it hereby provides an exclusive licence to the client for the use of such documents by the client in all matters directly relating to the project. The views and recommendations expressed in this report are those of South West Archaeology Ltd. and are presented in good faith on the basis of professional judgement and on information available at the time of production.

## CONTENTS

---

<i>SUMMARY</i>	2
<i>CONTENTS</i>	3
<i>LIST OF TABLES</i>	3
<i>LIST OF FIGURES</i>	4
<i>LIST OF APPENDICES</i>	4
<i>ACKNOWLEDGEMENTS</i>	4
<i>PROJECT CREDITS</i>	4
<b>1.0 INTRODUCTION</b>	<b>5</b>
1.1 PROJECT BACKGROUND	5
1.2 TOPOGRAPHY AND GEOLOGY	5
1.3 HISTORICAL & ARCHAEOLOGICAL BACKGROUND	5
1.4 METHODOLOGY	6
<b>2.0 HERITAGE IMPACT ASSESSMENT</b>	<b>7</b>
2.1 HERITAGE IMPACT ASSESSMENT - OVERVIEW	7
2.2 NATIONAL POLICY	7
2.3 LOCAL POLICY	8
2.4 STRUCTURE OF ASSESSMENT – DIRECT AND INDIRECT IMPACTS	8
2.5 DEVELOPMENT PROPOSALS	8
<b>3.0 DIRECT IMPACTS</b>	<b>10</b>
3.1 STRUCTURE OF ASSESSMENT	10
3.2 DOCUMENTARY HISTORY	10
3.3 CARTOGRAPHIC DEVELOPMENT	10
3.4 ARCHAEOLOGICAL BACKGROUND	14
3.5 AERIAL PHOTOGRAPHY	24
3.6 LIDAR DATA	25
3.7 WALKOVER SURVEY	27
3.8 ARCHAEOLOGICAL POTENTIAL AND IMPACT SUMMARY	29
<b>4.0 INDIRECT IMPACTS</b>	<b>30</b>
4.1 STRUCTURE OF THE ASSESSMENT	30
4.2 QUANTIFICATION	31
4.3 IMPACT BY CLASS OF MONUMENT OR STRUCTURE	32
<b>5.0 CONCLUSIONS</b>	<b>44</b>
<b>6.0 BIBLIOGRAPHY &amp; REFERENCES</b>	<b>45</b>

## LIST OF TABLES

---

TABLE 1: EXTRACT FROM THE 1839 TITHE APPORTIONMENT FOR ILFRACOMBE.	11
TABLE 2: TABLE OF NEARBY HERITAGE ASSETS.	16
TABLE 3: TABLE OF DESIGNATED HERITAGE ASSETS.	22
TABLE 4: TABLE OF NEARBY ARCHAEOLOGICAL INVESTIGATIONS.	24
TABLE 5: SUMMARY OF DIRECT IMPACTS.	29
TABLE 6: SUMMARY OF IMPACTS AND EFFECTS.	43

## LIST OF FIGURES

---

*COVER PLATE: VIEW ACROSS THE ILFRACOMBE CONSERVATION AREA FROM HILLSBOROUGH PROMONTORY FORT; VIEWED FROM THE EAST.*

FIGURE 1: SITE LOCATION.	6
FIGURE 2: INDICATIVE 3D VISUALISATION OF THE PROPOSED DEVELOPMENT.	9
FIGURE 3: EXTRACT FROM THE 1804 OS SURVEYORS DRAFT MAP FOR BARNSTAPLE.	11
FIGURE 4: EXTRACT FROM ILFRACOMBE TITHE MAP.	12
FIGURE 5: EXTRACT FROM THE 1886-8 1 <sup>ST</sup> EDITION OS 25" MAP.	13
FIGURE 6: EXTRACT FROM THE 1903 2 <sup>ND</sup> EDITION OS 25" MAP.	13
FIGURE 7: EXTRACT FROM THE 1938 2 <sup>ND</sup> EDITION OS 6" MAP.	14
FIGURE 8: HERITAGE ASSETS WITHIN 500M OF THE PROPOSAL AREA RECORDED IN THE DEVON HER.	16
FIGURE 9: DESIGNATED HERITAGE ASSETS WITHIN 500M OF THE PROPOSED SITE.	22
FIGURE 10: HERITAGE INTERVENTIONS WITHIN 500M OF THE PROPOSAL AREA RECORDED IN THE DHER.	24
FIGURE 11: AERIAL PHOTOGRAPH FROM 2001.	25
FIGURE 12: AERIAL PHOTOGRAPH FROM 2010.	25
FIGURE 13: 1M LIDAR DTM DATA (HILLSHADE).	26
FIGURE 14: 1M LIDAR DTM DATA (SLOPE).	27
FIGURE 15: SITE LAYOUT SHOWING LOCATION OF IDENTIFIED EARTHWORK FEATURES.	28
FIGURE 16: VIEW OF EARTHWORK PLATFORM/TERRACE AND SURROUNDING BANKED FEATURE.	28
FIGURE 17: VIEW ACROSS THE ILFRACOMBE CONSERVATION AREA FROM THE CHAPEL OF ST NICHOLAS WITH LIGHTHOUSE.	34
FIGURE 18: VIEW TOWARDS THE PROPOSAL SITE FROM THE CHURCH OF HOLY TRINITY (AND ASSOCIATED MONUMENTS).	35
FIGURE 19: VIEW ACROSS THE ILFRACOMBE CONSERVATION AREA FROM THE CHURCH OF ST PHILIP & ST JAMES.	37
FIGURE 20: VIEW ACROSS ILFRACOMBE FROM HILLSBOROUGH PROMONTORY FORT.	39
FIGURE 21: VIEW TOWARDS THE FORMER GRANVILLE HOTEL FROM ONE OF THE VIEWPOINTS ON CAPSTONE.	42

## LIST OF APPENDICES

---

APPENDIX 1: SUPPORTING PHOTOGRAPHS - WALKOVER SURVEY	46
APPENDIX 2: IMPACT ASSESSMENT METHODOLOGY	49
APPENDIX 3: SUPPORTING PHOTOGRAPHS - IMPACT ASSESSMENT	64

## ACKNOWLEDGEMENTS

---

THE CLIENT  
 THE LANDOWNER (FOR ACCESS)

## PROJECT CREDITS

---

PROJECT DIRECTOR: DR. SAMUEL WALLS, MCIFA  
 PROJECT OFFICER: DR. SAMUEL WALLS, MCIFA  
 FIELDWORK: PETER WEBB  
 REPORT: FAYE BALMOND, MCIFA; PETER WEBB  
 DESK-BASED ASSESSMENT: FAYE BALMOND, MCIFA  
 GRAPHICS: FAYE BALMOND, MCIFA; PETER WEBB  
 EDITING: DR. SAMUEL WALLS, MCIFA

## 1.0 INTRODUCTION

---

<b>LOCATION:</b>	LAND ABOVE LADIES BEACH, GRANVILLE ROAD
<b>PARISH:</b>	ILFRACOMBE
<b>DISTRICT:</b>	NORTH DEVON
<b>COUNTY:</b>	DEVON
<b>CENTROID NGR:</b>	SS 51560 47854
<b>PLANNING REF:</b>	76024
<b>SWARCH REF:</b>	ILGR22
<b>OASIS REF:</b>	SOUTHWES1-511510

### 1.1 PROJECT BACKGROUND

South West Archaeology Ltd. (SWARCH) was commissioned to undertake a heritage impact assessment for a proposed development at land above Ladies Beach, Granville Road, Ilfracombe, Devon. This work was undertaken in accordance with best practice and ClfA guidelines.

### 1.2 TOPOGRAPHY AND GEOLOGY

The site is located on an undeveloped spur of land at the top of the cliffs to the west of Ilfracombe, to the south of an area known as The Outfalls, west of Wrath Rock and east of Tunnels Beach. It is located north of Granville Road at a height of c.40m AOD. The site lies immediately east of the North Devon Coast AONB with the western access to the beach lying within the AONB. The soils of this area are the freely draining slightly acid loamy soils of Soilscape 6 (CSAI 2022) which overlie the slates of the Kentisbury Slates Member (BGS 2022).

### 1.3 HISTORICAL & ARCHAEOLOGICAL BACKGROUND

The site lies on a cliff top location to the west of the main settlement of Ilfracombe, north of Granville Road. Ilfracombe is an ancient sea port and market town, lying 19km north-west of Barnstaple, built at the foot of a steep upward slope. It derives its name from a personal name 'Aelfred' and the old English element 'cumb' meaning coombe or valley (University of Nottingham 2022). The parish of Ilfracombe is bordered by Berrynarbor to the east, slightly by Bittadon to the south-east, shares a considerable south border with West Down and is bordered by Mortehoe to the west. Historically the parish lay within the Braunton Hundred and ecclesiastically fell within the Deanery of Shirwell (Lysons 1822). The population of the town increased fivefold from the time of the initial census in 1838 to 8557 in 1901, illustrating the rate at which the town grew during the 19<sup>th</sup> century. The manor of Ilfracombe formed part of the barony of Barnstaple and passed through the Martin and Audley families to the Bouchiers.

The proposal site appears to have been part of a large pasture field at the beginning of the 19<sup>th</sup> century, subdivided by the end of the 19<sup>th</sup> century and divided again by a new road at the beginning of the 20<sup>th</sup> century as the development of Ilfracombe as a Victorian seaside tourist destination pushed development further out from its historic linear core. The site falls into an area classified in the Devon Historic Landscape Characterisation as *Post Medieval Enclosures: Enclosures of post-medieval date. Fields laid out in the C18<sup>th</sup> and C19<sup>th</sup> commonly have many surveyed dead-straight field boundaries.*

Very little archaeological work appears to have taken place within the vicinity of the site. A watching brief off Granville Road to the south-west of the site revealed no archaeological features or finds (EDV4219), nor did a watching brief at the site of Brayfield Hotel (EDV4755). A watching brief at St Phillips and St James Church (EDV5347) revealed Post Medieval pottery, one of the few assemblages from Ilfracombe, suggestive of a lack of archaeological fieldwork within the settlement rather than necessarily a lack of archaeological remains. As much of the development of Ilfracombe

took place in the Victorian period it is likely any archaeological remains were not noted.

Due to the density of development and the location of the site a 500m radius around the site has been considered. There are 68 Grade II listed buildings and one Conservation Area within 500m of the proposed development site. There are no World Heritage Sites, Scheduled Monuments or Registered Parks and Gardens within 500m of the site.

#### 1.4 METHODOLOGY

This archaeological assessment was undertaken in accordance with best practice. 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 3rd 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 Cifa, IHBC and IEMA in July 2021.



FIGURE 1: SITE LOCATION. ORDNANCE SURVEY © CROWN COPYRIGHT 2022. ALL RIGHTS RESERVED.

## 2.0 HERITAGE IMPACT ASSESSMENT

---

### 2.1 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, monument or archaeological site (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 approach outlined in the relevant DoT guidance (DMRB LA 104 2020), used in conjunction with the ICOMOS (2011) guidance and the staged approach advocated in *The Setting of Heritage Assets* (GPA3 2<sup>nd</sup> Ed Historic England 2017). The methodology employed in this assessment can be found in Appendix 2.

### 2.2 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 2021). The relevant guidance is reproduced below:

*Paragraph 189*

*Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.*

*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.*

*Paragraph 206*

*Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.*

A further key document is the Planning (Listed Buildings and Conservation Areas) Act 1990, 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.*

*Paragraph 207*

*Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.*

## **2.3 LOCAL POLICY**

*The North Devon and Torridge Local Plan 2011-2031:*

*Policy ST15: Conserving Heritage Assets*

*Great weight will be given to the desirability of preserving and enhancing northern Devon's historic environment by:*

*(a) conserving the historic dimension of the landscape;*

*(b) conserving cultural, built, historic and archaeological features of national and local importance and their settings, including those that are not formally designated;*

*(c) identifying and protecting locally important buildings that contribute to the area's local character and identity; and*

*(d) increasing opportunities for access, education and appreciation of all aspects of northern Devon's historic environment, for all sections of the community.*

*Proposals that will help to secure a sustainable future for the Cornwall's heritage assets, especially those identified as being at greatest risk of loss or decay, will be supported.*

## **2.4 STRUCTURE OF ASSESSMENT – DIRECT AND INDIRECT IMPACTS**

This assessment is broken down into two main sections. Section 3.0 addresses the *direct impact* of the proposed development i.e. the physical effect the development may have on heritage assets within, or immediately adjacent to, the development site. Designated heritage assets on or close to a site are a known quantity, understood and addressed via the *design and access statement* and other planning documents. Robust assessment, however, also requires a clear understanding of the value and significance of the *archaeological* potential of a site. This is achieved via the staged process of archaeological investigation detailed in Section 3.0. Section 4.0 assesses the likely effect of the proposed development on known and quantified designated heritage assets in the local area. In this instance the impact is almost always indirect i.e. the proposed development impinges on the *setting* of the heritage asset in question and does not have a direct physical effect.

## **2.5 DEVELOPMENT PROPOSALS**

The proposed development comprises a development of a single three storey five-bedroom residential development with swimming pool and gardens on a coastal area to the north of Grenville Road, Ilfracombe.





FIGURE 2: INDICATIVE 3D VISUALISATION OF THE PROPOSED DEVELOPMENT (SUPPLIED BY CLIENT)

## 3.0 DIRECT IMPACTS

---

### 3.1 STRUCTURE OF ASSESSMENT

For the purposes of this assessment, the *direct effect* of a development is taken to be its direct physical effect on the buried archaeological resource. In most instances the effect will be limited to the site itself. However, unlike designated heritage assets (see Section 4.0) the archaeological potential of a site, and the significance of that archaeology, must be quantified by means of a staged programme of archaeological investigation. Sections 3.2-3.7 examine the documentary, cartographic and archaeological background to the site; Section 3.8 summarises this information in order to determine the significance of the archaeology, the potential for harm, and outlines mitigation strategies as appropriate. Appendix 3 details the methodology employed to make this judgement.

### 3.2 DOCUMENTARY HISTORY

Ilfracombe is an ancient sea port and market town, lying 19km north-west of Barnstaple, built at the foot of a steep upward slope. It derives its name from a personal name 'Aelfred' and the old English element 'cumb' meaning coombe or valley (University of Nottingham 2022). The parish of Ilfracombe is bordered by Berrynarbor to the east, slightly by Bittadon to the south-east, shares a considerable south border with West Down and is bordered by Mortehoe to the west. Historically the parish lay within the Braunton Hundred and ecclesiastically fell within the Deanery of Shirwell (Lysons 1822). The population of the town increased fivefold from the time of the initial census in 1838 to 8557 in 1901, illustrating the rate at which the town grew during the 19<sup>th</sup> century. The manor of Ilfracombe formed part of the barony of Barnstaple and passed through the Martin and Audley families to the Bouchiers.

The Tithe apportionment for Ilfracombe shows Nathaniel Vye Lee was the owner of the large plot of pasture named Tuckers Runny Cleave of which the site formed part. Hannah Davis was documented as the occupier. There is no Hannah Davis documented in the 1841 census in Ilfracombe but an Anna Davis was recorded as a 40 year old butcheress residing on the High Street and is likely to have been the occupier recorded by the tithe apportionment. The 1851 census shows she was a widow and by this date was documented as a lodging house-keeper at 5 Regent Place. The 1861 census does appear to record her name as Hannah Davis suggesting an element of mis-transcription has occurred in some of these documents. There are a number of Nathaniel Vye's documented in the census data however Nathaniel Vye Lee Esq named on the tithe apportionment is likely to have been born c.1777 and died in 1849 with no direct descendants. The name Nathaniel Vye was clearly not unique in this period of Ilfracombe's history as a banker named Nathaniel Vye (1759-1835) was documented along with another Nathaniel Vye, a medical practitioner (1891-1840) who donated a large collection of rare texts (known as the Vye Collection) to the University of London library. The 1841 census documents a Nathaniel Vye as a 20 year old solicitor living at Red House in Ilfracombe with two servants. He was recorded in 1851 as magistrate for the county of Devon, residing at Manor House, Ilfracombe. By 1871 he was recorded as a JP, Deputy Lieutenant and landowner, residing at Rosemont House in Ilfracombe. The will for Nathaniel Vye Lee Esq proved 1850 (PRO PROB11/2106/349) specifically names him as such and an obituary in the Gentleman's Magazine for 1849 states 'at Ilfracombe, aged 72, Nathaniel Vye Lee esq. For many years an active magistrate of the county'. It would therefore seem that this Nathaniel was the most likely owner of the plot at the date of the tithe apportionment.

### 3.3 CARTOGRAPHIC DEVELOPMENT

The first map available to this study is the 1804 Surveyors Draft map for Barnstaple (Figure 3) which shows Ilfracombe as a well developed linear settlement, largely laid out along both sides of the road

leading down to the harbour. Some developed along roads leading off this is shown. There is no development indicated in the vicinity of the proposed site and no roads are shown in this area at this date.



FIGURE 3: EXTRACT FROM THE 1804 OS SURVEYORS DRAFT MAP FOR BARNSTAPLE; THE APPROXIMATE SITE IS INDICATED (BL).

The Ilfracombe Tithe Map (Figure 4) and 1839 apportionment shows that the site formed part of a large plot, recorded as pasture land at this date and owned by Nathaniel Vye Lee, who also appears to have held much of the land around the site, with the exception of plots to the east of the site which appear to have been glebe land held by the Vicar of Ilfracombe.

TABLE 1: EXTRACT FROM THE 1839 TITHE APPORTIONMENT FOR ILFRACOMBE. PLOTS WITHIN THE RED LINE BOUNDARY OF THE DEVELOPMENT ARE HIGHLIGHTED IN GREEN.

Plot No	Owner	Occupier	Name	Cultivation
368	The Vicar of Ilfracombe and his trustee Nathaniel Vye Lee and others	Peter Dart	Vicar Runny Cleave	Pasture
369	Nathaniel Vye Lee	Himself	Tuckers Runny Cleave Meadow	Pasture
370		Hannah Davis	Tuckers Runny Cleave	Pasture
371			Tuckers Little Runny Cleave	Pasture



FIGURE 4: EXTRACT FROM ILFRACOMBE TITHE MAP; THE APPROXIMATE SITE IS INDICATED (TNA).

The 1886-8 Ordnance Survey First Edition map (Figure 5) for the area around the site shows the site area to have been subdivided from the large plot shown on the mid 19<sup>th</sup> century tithe map into two fields. A rocky headland is shown on the northern side of the site. A number of bathing areas are shown on the foreshore including ladies' and gentlemen's baths to the west and Ilfracombe hotel baths to the east. Ilfracombe Hotel is shown to the east of the site, evidently constructed after 1840 and the settlement of Ilfracombe can be seen to have expanded substantially to the north, with buildings now extending northwards from the main street through the settlement and new roads added to enable access. A number of large villa type dwellings is evident to the south of the site. A series of caves are labelled in the cliffs immediately below and around the proposed site including Crewkhorne Cave, to the west of the site. By the 1903 Second Edition Ordnance Survey map (Figure 6) further changes are apparent, most notably the creation of Granville Road, cutting through the fields which comprises part of the site and creating its present, southern boundary. A large building is shown, enveloped by Grenville Road and within the site area itself a footpath is shown running north-west to south-east; the cliffs below are steep so this may have provided access to a viewpoint rather than the foreshore. The footpath is still evident on the revised Second Edition OS map of 1938 (Figure 7) and further buildings are shown on this map to the south of Granville Road. A 1930s aerial photograph (not illustrated) suggests the land which the proposal site occupies may have formed something of an open space at this date with views out to sea and part of the site possibly still in agricultural use.

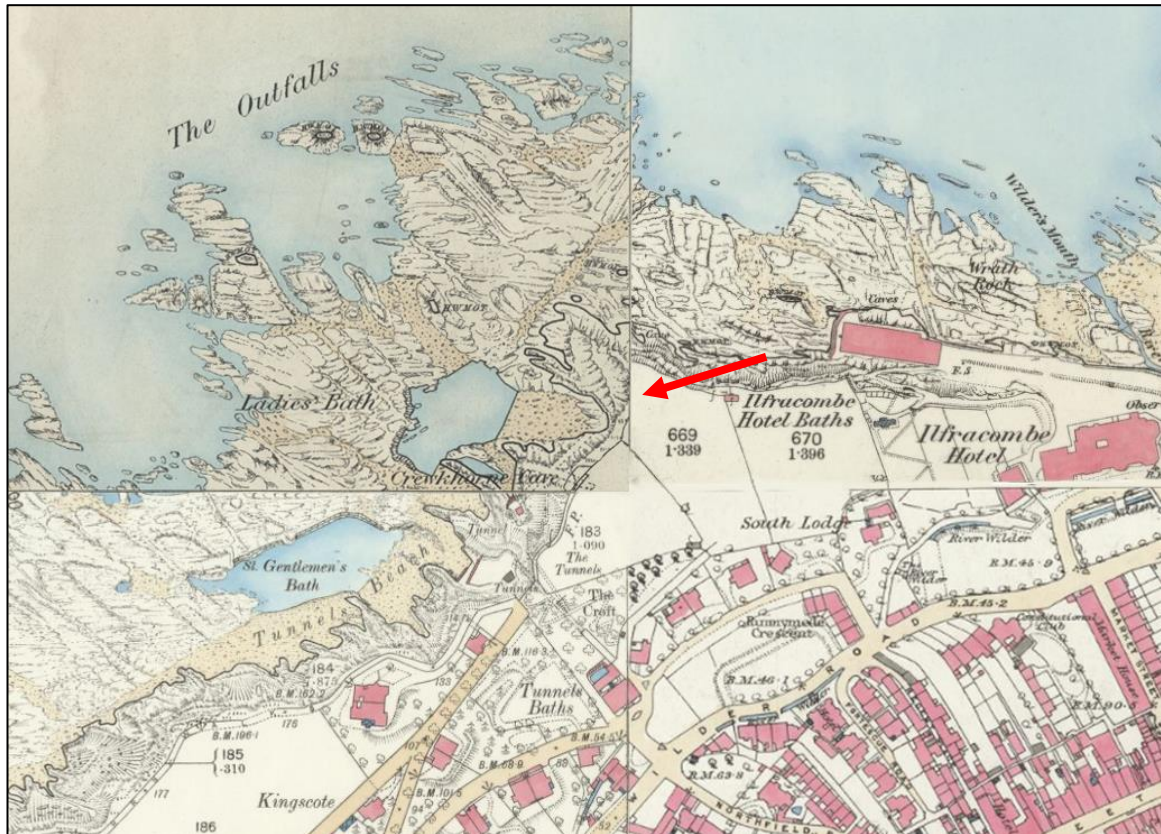


FIGURE 5: EXTRACT FROM THE 1886-8 1<sup>ST</sup> EDITION OS 25" MAP; THE APPROXIMATE SITE IS INDICATED (NLS).

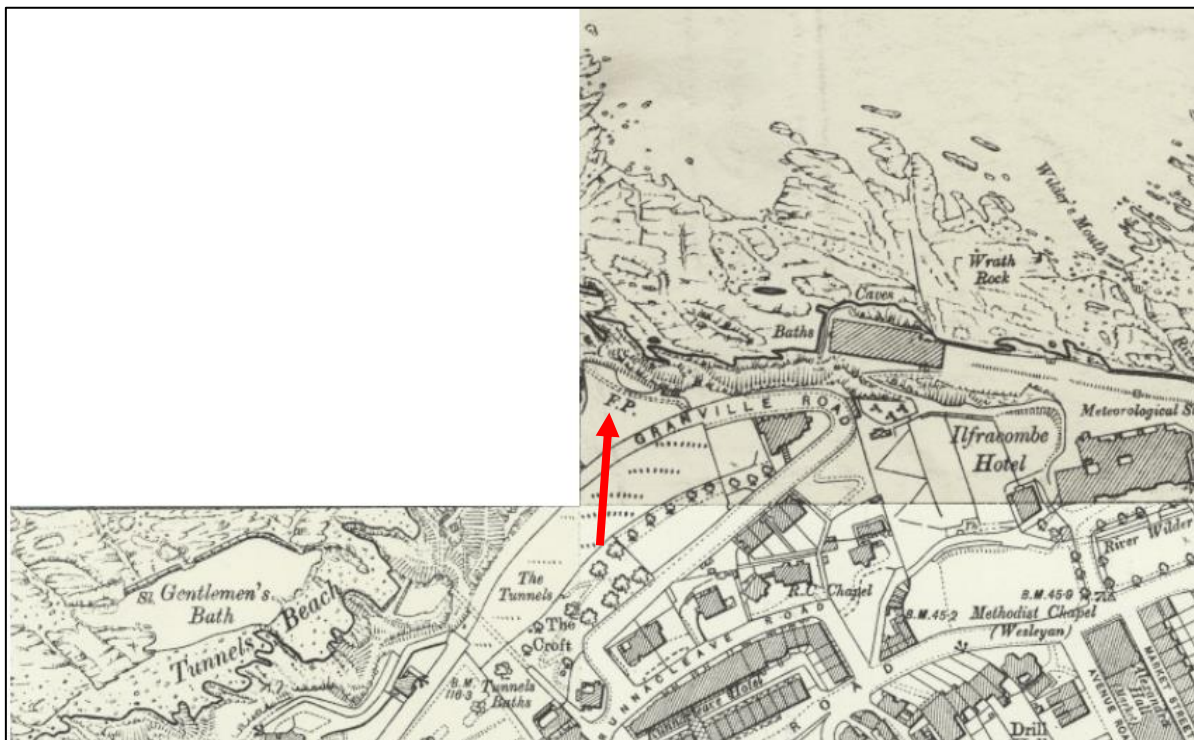


FIGURE 6: EXTRACT FROM THE 1903 2<sup>ND</sup> EDITION OS 25" MAP; THE APPROXIMATE SITE IS INDICATED (NLS).



FIGURE 7: EXTRACT FROM THE 1938 2<sup>ND</sup> EDITION OS 6" MAP; THE APPROXIMATE SITE IS INDICATED (NLS).

### 3.4 ARCHAEOLOGICAL BACKGROUND

The proposal site appears to have been part of a large pasture field at the beginning of the 19<sup>th</sup> century, subdivided by the end of the 19<sup>th</sup> century and divided again by a new road at the beginning of the 20<sup>th</sup> century as the development of Ilfracombe as a Victorian seaside tourist destination pushed development further out from its historic linear core. The site falls into an area classified in the Devon Historic Landscape Characterisation as *Post Medieval Enclosures: Enclosures of post-medieval date. Fields laid out in the C18<sup>th</sup> and C19<sup>th</sup> commonly have many surveyed dead-straight field boundaries.*

Very little archaeological work appears to have taken place within the vicinity of the site. A watching brief off Granville Road to the south-west of the site revealed no archaeological features or finds (EDV4219), nor did a watching brief at the site of Brayfield Hotel (EDV4755). A watching brief at St Phillips and St James Church (EDV5347) revealed Post Medieval pottery, one of the few assemblages from Ilfracombe, suggestive of a lack of archaeological fieldwork within the settlement rather than necessarily a lack of archaeological remains. As much of the development of Ilfracombe took place in the Victorian period it is likely any archaeological remains were not noted.

Due to the density of development and the location of the site a 500m radius around the site has been considered. There are 68 Grade II listed buildings and one Conservation Area within 500m of the proposed development site. There are no World Heritage Sites, Scheduled Monuments or Registered Parks and Gardens within 500m of the site.

#### 3.4.1 PREHISTORIC 4000BC - AD43

There is very limited evidence for Prehistoric settlement and occupation in the area of Ilfracombe immediately adjacent to the site. The only find of this date within 500m of the site are some Bronze Axes brought into the museum in the 1960s but may not have been recovered in this area (MDV30172). Sites such as the Scheduled Hillsborough Promontory Fort in the wider landscape

suggest that there was relatively extensive occupation and utilisation of this area during at least some of the Prehistoric periods and the cliff top coastal location of the site could be considered as having archaeological potential for Prehistoric remains. The lack of any identified in this area may either be to do with a lack of recent fieldwork or extensive Victorian development of the areas around the core settlement potentially removing archaeological evidence from this period.

#### **3.4.2 ROMANO-BRITISH AD43 – AD409**

A roman coin minted in France (MDV21753) is the only evidence of Roman settlement or occupation recorded within 500m of the site. As this was recovered at Wildersmouth Bay it is unclear how it may have been deposited at that location – either from inland or from the sea.

#### **3.4.3 MEDIEVAL AD410 – AD1540**

The settlement of Ilfracombe originated before the Domesday survey, becoming a borough during the medieval period. A small number of sites of Medieval date are recorded within 500m of the site, although none are within the immediate vicinity of the site. To the east of the site a mix of pottery including Medieval sherds was recovered from a garden (MDV126786). Further sherds of Medieval ceramics were recovered during work at the former Brayfield Hotel to the south of the site (MDV77871). The font within Holy Trinity Parish Church is believed to be of Norman date although recut (MDV2206).

#### **3.4.4 POST-MEDIEVAL AD1540 -1899**

A large number of sites of Post Medieval date are recorded in the Devon HER within 500m of the site as this is the period in which Ilfracombe saw its biggest expansion as it became a seaside holiday destination. Features such as ladies' and gentlemen's baths were created in 1836 when tunnels were cut through the rock (MDV78905) to facilitate bathing. Opposite the site is the former Granville Hotel (MDV109413) one of a number of large Victorian hotels built to accommodate the influx of visitors and now converted into flats. To the south of the site lies another Victorian hotel, the Carlton Hotel (MDV109536) and the Roman Catholic Church of Our Lady, Star of the Sea (MDV109537). The large Ilfracombe Hotel lay to the south-east of the site (MDV78904) the site of which now forms part of the Landmark Theatre. To the south and east of the site a large number of Post Medieval sites such as pleasure grounds, shops and houses are recorded, all dating to the early Victorian expansion of Ilfracombe. A number of the earlier buildings and structures are Grade II Listed, particularly those around the historic core of the settlement.

#### **3.4.5 MODERN 1900-PRESENT AND UNKNOWN**

Several features of Modern date are recorded in the DHER, a number of which relate to World War Two military buildings (MDV103134) and an emergency water supply (MDV103132). There are no features of this period identified in the immediate vicinity of the site.

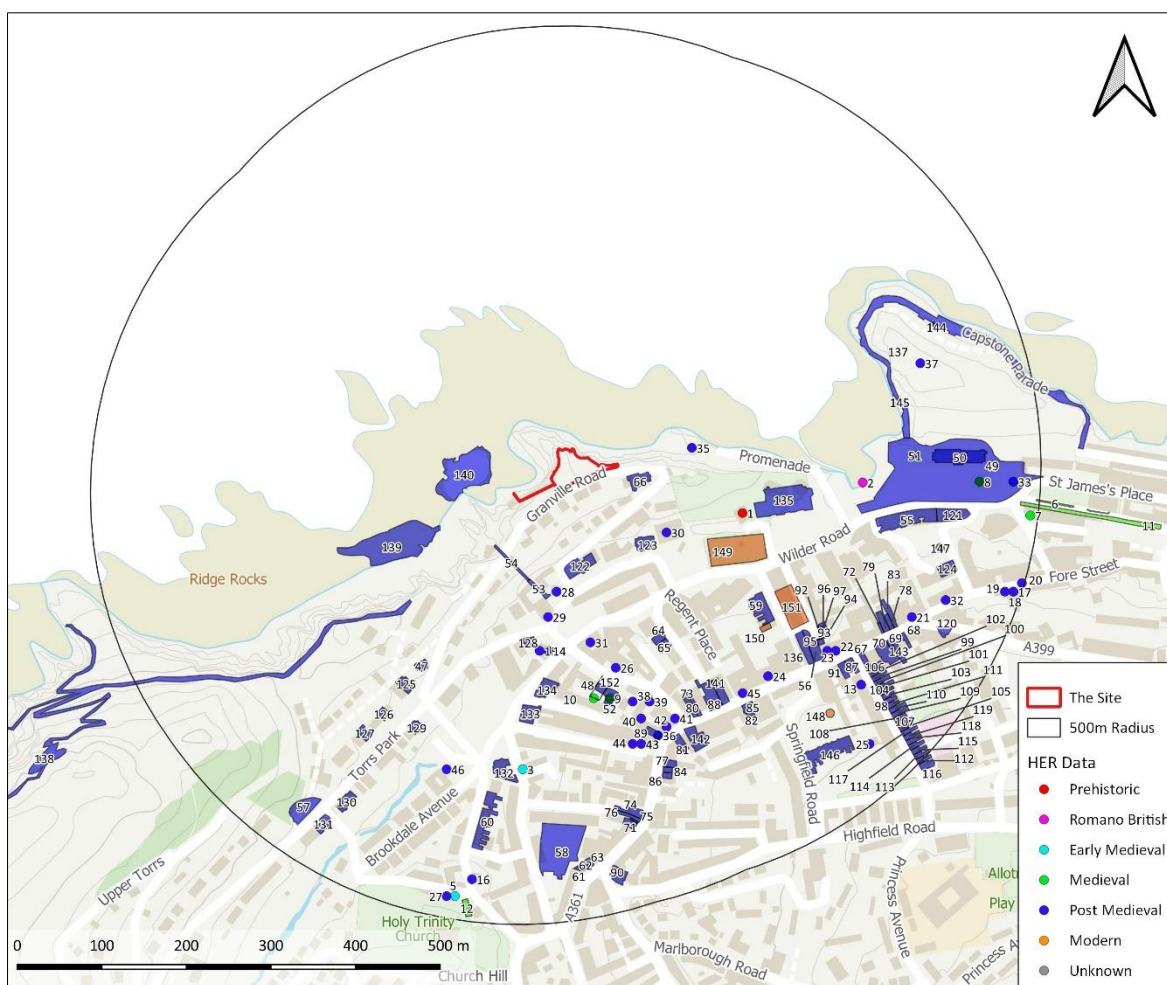


FIGURE 8: HERITAGE ASSETS WITHIN 500M OF THE PROPOSAL AREA RECORDED IN THE DEVON HER CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2022. THE APPROXIMATE SITE IS INDICATED.

TABLE 2: TABLE OF NEARBY HERITAGE ASSETS (SOURCE: DHER).

No	HER No	Name	Summary
1	MDV30172	Bronze Age Axes in Ilfracombe Museum	Socketed axe and two flanged axes now in Ilfracombe Museum. Original find spot unknown.
2	MDV21753	Roman Coin found at Wildersmouth Bay, Ilfracombe	Fourth century Roman coin.
3	MDV18665	Ilfracombe	Ilfracombe is first recorded in the Domesday Survey. It grew in significance in the medieval period as a borough. It became an important seaport and more recently a popular seaside resort.
4	MDV21752	The Borough of Ilfracombe	Ilfracombe grew in significance in the medieval period being given borough status in about the 13 <sup>th</sup> century.
5	MDV2206	FONT in the Parish of Ilfracombe	Holy trinity parish church. Scalloped font of bath stone. Original has been cut down and recut.
6	MDV126786	Pottery assemblage from garden of St Philip and St James's Church, Ilfracombe	A mixed assemblage of pot sherds was recovered during a watching brief carried out at the church in January 2011. The pottery was mostly post medieval and modern but there was also one sherd of medieval coarseware.
7	MDV54328	WATERMILL in the Parish of Ilfracombe	Town flour mills, Ilfracombe.
8	MDV64411	FINDSPOT in the Parish of Ilfracombe	Sherd of 'north Devon' medieval coarse pottery found during work on the crazy golf course. Post medieval sherds + clay pipe stems were also found.
9	MDV77871	Medieval and Post-Medieval Pot, Northfield Road, Ilfracombe	Pot of 14 <sup>th</sup> - to 19 <sup>th</sup> century date.
10	MDV77873	Former Structure to Rear of	Wall foundation and floor surfaces sealing 15 <sup>th</sup> - or 16 <sup>th</sup> century



		Brayfield Hotel, Ilfracombe	pot. Possible structure.
11	MDV53812	Ropewalk, Ilfracombe	The site of the former ropewalk in Ilfracombe is marked by Ropery Road.
12	MDV2205	Church House, Ilfracombe	Site of the old workhouse which stood at the top of the church steps, slightly above the building used as a workmen's club. The building was originally a church house and was turned into a workhouse in 1736.
13	MDV1815	Oxford Hall, Oxford Grove, Ilfracombe	Former Bible Christian Chapel which amalgamated with an ex-Wesleyan Chapel and opened in 1891. Closed in 1936.
14	MDV23842	HOUSE in the Parish of Ilfracombe	Nos 1 and 2, Bath Place. Circa 1830, 2 storey and attic stucco pair, each house 2 windows, sash windows and tall casements. Some glazing bars removed. Splayed bays, perhaps later, to ground floor. Linked mutular Doric porches with fluted Greek Doric columns.
15	MDV23843	HOUSE in the Parish of Ilfracombe	No 3, Bath Place. Circa 1830 adjoining nos 1 and 2. Stucco. Front consists of 2 storey splayed projection with round-headed sash windows. 1 glazed door to ground floor. Parapet, cope. Dormer.
16	MDV23852	HOUSE in the Parish of Ilfracombe	No 11 (Russell House), stable building to south and garden walls to north and west, Church Road. In own garden with front at right angles to road. 2 storey, 5 sash windows, at 1st floor, with glazing bars. Stucco. Splayed projection on south front. Slate.
17	MDV23856	HOUSE in the Parish of Ilfracombe	No 26, Fore Street. Early c19 stucco whitened, arched central entrance with blank panel above and 2 sash windows with glazing bars at 1st floor. Grade II as part of Waterloo Terrace.
18	MDV23857	HOUSE in the Parish of Ilfracombe	No 27a, Fore Street. Early c19, stucco colourwashed 2 storey, 2 sash windows at each floor with glazing bars. Entrance with fanlight, left. Grade II as part of Waterloo Terrace.
19	MDV23858	HOUSE in the Parish of Ilfracombe	Nos 27 and 28, Fore Street. Early c19, part of Waterloo Terrace which stands above road level but is numbered as part of fore street. The terrace has access and railings similar to Coburg Terrace (qv). 3 storey. 2 windows each house including blank panels.
20	MDV23859	SHOP in the Parish of Ilfracombe	Nos 54, 56 and 57, Fore Street. No number 55. C18 or early c19. No 54 is 2 storey 3 window including blank panel, centre. Pantile roof. 2 square-headed sash dormers. Keystones to 1st floor flush frame sash windows now with centre glazing bars only.
21	MDV23914	SHOP in the Parish of Ilfracombe	Nos 1 to 4, High Street. Early c19 3 storey stucco fronts. Nos 1 and 2 together 3 windows, nos 3 and 4 3 windows each, sash with glazing bars. Nos 1 and 2, one composition with flank pilasters. Moulded window architraves, cornice, parapet. C19 and modern.
22	MDV23915	SHOP in the Parish of Ilfracombe	Nos 15 to 17, High Street. Early c19. 1 block. Tall 3 storey and attic 2 window stucco fronts divided into panels by flat pilasters and bands. Sash windows with moulded architraves, mainly with glazing bars remaining. Square-headed sash dormers. C19 shop
23	MDV23916	SHOP in the Parish of Ilfracombe	Nos 18 and 19, High Street. Probably early or mid c18 house, 2 storey and attics. 4 large 1st floor sash windows, with glazing bars, (one 3-light window) and moulded architraves. Moulded eaves cornice. 4 sash dormers. Modern ground floor shop fronts.
24	MDV23918	SHOP in the Parish of Ilfracombe	No 28, High Street. Early c19 3 storey 2 window front. Band, parapet cope. Enriched neo-grec hoods to 1st floor windows. Continuous 1st floor iron balcony. Interesting mid c19 front to chemist's shop, with cast iron supports and plate tracery to spandril.
25	MDV23930	HOUSE in the Parish of Ilfracombe	Nos 4 and 5, Meridian Place. Early c19 3 storey stucco pair. Basements. Each house, 2 windows, sash with glazing bars. Doors, which are 5-panel, are linked under Doric porch with triglyphs, cast iron balustrade to roof forms balcony to 2 central 1st floor.

26	MDV23934	HOUSE in the Parish of Ilfracombe	Northfield House, Northfield Road. Circa 1830 stucco house. Earlier part of front is 3 storey 3 window with large 2-storey splayed bays flanking doorway. Sash windows with altered glazing bars. Tuscan porch has balcony above with cast-iron balustrade.
27	MDV23935	HOUSE in the Parish of Ilfracombe	No 11 and 12 (Osborne House), Osborne Road. Early c19, one composition. 2 and 3 storeys with centre projection to road. Rendered and lined. Sash windows with glazing bars. No 11 entrance from road has 6-panel door with glazed upper half and narrow fanlight.
28	MDV23942	HOUSE in the Parish of Ilfracombe	Runnymede, Runnacleave Road. Mid c19 picturesque gabled style detached stucco house. Castellated parapets, octagonal chimneys etc. West front has central 1st floor oriel with traceried windows. 2 flat splayed ground floor bays. Central gable has casement.
29	MDV23943	The Baths House, Runnacleave Road, Ilfracombe	A bath house built in 1836 at a time when Ilfracombe was becoming a popular resort.
30	MDV23944	HOUSE in the Parish of Ilfracombe	South Lodge, Runnacleave Road. Early to mid c19 stucco house. 3 window front. Central projection is 3 storey with oriel windows to upper floors. Gabled porch. Pendant ornament to lower edges of barge boards and parapet fascia. Finials at parapet angles.
31	MDV23949	HOUSE in the Parish of Ilfracombe	Nos 2 and 3 (Sandringham), Wilder Road. Circa 1830 2 storey stucco pair. No 2 has square projection on ground floor with pilaster treatment and dentil cornice. This includes bay window and doorway. Narrower bay above has base swept up from roof of lower bay.
32	MDV38907	Addit or mine shaft, High Street, Ipplepen	Candar development, High Street. Addit or mine shaft cut into shillet bedrock, backfilled in the c19.
33	MDV53810	CHAPEL in the Parish of Ilfracombe	SWW trench revealed foundations of substantial stone wall. Probably E wall of former Wesleyan chapel which was built in 1864 to replace earlier (1833) building on same site.
34	MDV53811	FINDSPOT in the Parish of Ilfracombe	18c/19c copper alloy shoe buckle recovered from SWW pipe trench. Context very disturbed. May have been within an earlier pipe trench.
35	MDV54782	Ilfracombe Hotel Baths	
36	MDV59139	HOUSE in the Parish of Ilfracombe	No 47 High Street.
37	MDV61263	SIGNAL POST in the Parish of Ilfracombe	Summit of capstone hill. Oldest print recorded for town, dating from 1774, shows signal post of some description. OS 1:500 map of 1889 depicts one, but on 1903 revision of 1:2500 OS map this has been replaced by a coastguard lookout and semaphore. 1946 ap
38	MDV62554	BUILDING in the Parish of Ilfracombe	Putts Garage Northfield Road. (Building E).
39	MDV62555	INDUSTRIAL BUILDING in the Parish of Ilfracombe	Building F. Unoccupied. Most recently a hairdressers.
40	MDV62556	INDUSTRIAL BUILDING in the Parish of Ilfracombe	Building G. Detached early 20c industrial building.
41	MDV62557	BUILDING in the Parish of Ilfracombe	Building H Council offices; 44 High Street (previously 41).
42	MDV62558	45 and 46 High Street, Ilfracombe	Building I. Supermarket, 45-46 High Street (previously 42).
43	MDV62559	BUILDING in the Parish of Ilfracombe	Building K. Building Society, 48 High Street (previously 44).
44	MDV62560	INDUSTRIAL BUILDING in the Parish of Ilfracombe	Building L, at rear of 48 High Street.
45	MDV66926	HOTEL in the Parish of Ilfracombe	C19 hotel, largely rebuilt 1881. Façade is of this date; remainder of building much altered in c20. Building is currently in very poor condition.
46	MDV78901	Bloody Meadow, Ilfracombe	Civil War battle reputed to have taken place in a field at the junction of the East and West Wilder brooks.
47	MDV109414	Kingscote, Granville Road,	Decorative five storey Victorian house built in 1874.

		Ilfracombe	
48	MDV23933	3 Northfield Road, Ilfracombe	Detached house, early 19 <sup>th</sup> - century.
49	MDV53813	Victoria Pleasure Grounds, Ilfracombe	The Victoria Pleasure Grounds were laid out in the late 19 <sup>th</sup> century on a plot of land formerly known as Ropery Meadow.
50	MDV53814	Victoria Pavilion, Victoria Pleasure Grounds, Ilfracombe	The Victoria Pavilion, a large glass and iron structure designed as a winter garden, was built in 1888. The glass wings of the pavilion survived until the 1970s.
51	MDV61262	Bandstand in the Victoria Pleasure Grounds, Ilfracombe	Octagonal bandstand built in the Victoria Pleasure Grounds in 1894. Demolished circa 1970.
52	MDV62553	1 and 2 Northfield Road, Ilfracombe	Pair of semi-detached houses. Early 19 <sup>th</sup> century, altered late 19 <sup>th</sup> century.
53	MDV78905	The Tunnels, Ilfracombe	In 1836 tunnels were bored through the rock to open up access to the beaches and two bathing pools were created, one for men and the other for women. The tunnels themselves, said to have been cut by Welsh miners, have no architectural features.
54			
55	MDV79812	Arcade, Belgrave Promenade	Nineteenth century arcade in Venetian Romanesque style. A significant contribution to the historic character of the area.
56	MDV23917	Old Town Hall, High Street, Ilfracombe	Three storey building dating from 1861-2. The three bay front, the central one narrower, accentuated by tiers of columns. The second and third floors have arched windows, the ground floor three semi-circular arches with shop, footway and road.
57	MDV124947	Quarry, Torrs Park, Ilfracombe	Site of quarry marked on 1889-90 25 inch Ordnance Survey map. The site is still partially visible, opposite Willow Court.
58	MDV125625	Gasworks, Wilder Road, Ilfracombe	Site of a 19 <sup>th</sup> and early 20 <sup>th</sup> century gasworks. The site was a council depot by the 1930s and is now a carpark.
59	MDV109395	3 to 8 Avenue Road, Ilfracombe	Victorian buildings proposed for listing in 1988, but not accepted by English Heritage.
60	MDV109399	Late Victorian Houses, Church Road, Ilfracombe	Victorian buildings proposed for listing in 1988, but not accepted by English Heritage.
61	MDV109402	1 and 2 Church Street and 70 High Street, Ilfracombe	Victorian buildings proposed for listing in 1988, but not accepted by English Heritage.
62	MDV109402	1 and 2 Church Street and 70 High Street, Ilfracombe	Victorian buildings proposed for listing in 1988, but not accepted by English Heritage.
63	MDV109402	1 and 2 Church Street and 70 High Street, Ilfracombe	Victorian buildings proposed for listing in 1988, but not accepted by English Heritage.
64	MDV109409	13 and 14 Fortescue Road, Ilfracombe	Victorian buildings proposed for listing in 1988, but not accepted by English Heritage.
65			
66	MDV109413	Granville Hotel, Granville Road, Ilfracombe	Victorian building proposed for listing in 1988, but not accepted by English Heritage. Subsequently converted to residential use.
67	MDV109418	Victorian Buildings, High Street, Ilfracombe	Victorian buildings proposed for listing in 1988, but not accepted by English Heritage.
68			
69			
70			
71			
72			
73			
74			
75			
76			
77			
78			
79			
80			
81			
82			
83			
84			
85			
86			

87			
88	MDV109420	Post Office, 37 and 38 High Street, Ilfracombe	Victorian building proposed for listing in 1988, but not accepted by English Heritage.
89	MDV109422	48 High Street, Ilfracombe	Victorian building proposed for listing in 1988, but not accepted by English Heritage.
90	MDV109423	74 High Street, Ilfracombe	Victorian building proposed for listing in 1988, but not accepted by English Heritage.
91	MDV109425	NatWest Bank, 135 High Street, Ilfracombe	Victorian building proposed for listing in 1988, but not accepted by English Heritage.
92	MDV109492	6 to 10 Market Square, Ilfracombe	Victorian buildings proposed for listing in 1988, but not accepted by English Heritage.
93			
94			
95			
96			
97	MDV109497	1 to 22 Oxford Grove, Ilfracombe	Terrace of Victorian buildings proposed for listing in 1988, but not accepted by English Heritage.
98			
99			
100			
101			
102			
103			
104			
105			
106			
107			
108			
109			
110			
111			
112			
113			
114			
115			
116			
117			
118			
119			
120	MDV109520	2 Portland Street, Ilfracombe	Victorian building proposed for listing in 1988, but not accepted by English Heritage.
121	MDV109528	9 to 14 The Promenade, Ilfracombe	Victorian building proposed for listing in 1988, but not accepted by English Heritage.
122	MDV109536	Carlton Hotel, Runnacleave Road, Ilfracombe	Victorian building proposed for listing in 1988, but not accepted by English Heritage.
123	MDV109537	Parish Church of Our Lady Star of the Sea, Runnacleave Road, Ilfracombe	Victorian church proposed for listing in 1988, but not accepted by English Heritage.
124	MDV109551	Arlington Hotel, Sommers Crescent, Ilfracombe	Victorian building proposed for listing in 1988, but not accepted by English Heritage.
125	MDV109552	Seven Hills, Torrs Park, Ilfracombe	Victorian building proposed for listing in 1988, but not accepted by English Heritage.
126	MDV109553	Royston, Torrs Park, Ilfracombe	Victorian building proposed for listing in 1988, but not accepted by English Heritage.
127	MDV109554	Rose Garth, Torrs Park, Ilfracombe	Victorian building proposed for listing in 1988, but not accepted by English Heritage.
128	MDV109563	Park Lodge, Torrs Park, Ilfracombe	Victorian building proposed for listing in 1988, but not accepted by English Heritage.
129	MDV109566	Riversdale House, Torrs Park, Ilfracombe	Victorian building proposed for listing in 1988, but not accepted by English Heritage.
130	MDV109567	Parkroyd, Torrs Park, Ilfracombe	Victorian building proposed for listing in 1988, but not accepted by English Heritage.
131	MDV109571	Wilderbrook, Torrs Park, Ilfracombe	Victorian building proposed for listing in 1988, but not accepted by English Heritage.
132	MDV109585	St. Michael's, Wilder Road,	Victorian building proposed for listing in 1988, but not

		Ilfracombe	accepted by English Heritage.
133	MDV109586	Westbourne, Wilder Road, Ilfracombe	Victorian building proposed for listing in 1988, but not accepted by English Heritage.
134	MDV109588	Stoneleigh, Gloucester, Wilder Road, Ilfracombe	Victorian building proposed for listing in 1988, but not accepted by English Heritage.
135	MDV78904	Ilfracombe Hotel	Site of the Ilfracombe Hotel.
136	MDV122533	Honiton Lace Depot, High Street, Ilfracombe	Site of the Honiton Lace Depot.
137	MDV124948	Flagstaff on Capstone Hill, Ilfracombe	Flagstaff by Coastguard's lookout on Capstone Hill.
138	MDV125037	Torrs Walks, Torrs Park, Ilfracombe	Torrs Walks, footpath branching off from main clifftop path giving access to the shore. Marked on late 19th century mapping, still extant on aerial images and Lidar and in use.
139	MDV130894	Gentlemen's Bath, Ilfracombe	Tunnels were cut through the rocks in 1836 and two seawater bathing pools created, one for men and one for women. The Gentlemen's Bath is depicted on the 1880s-1890s Ordnance Survey map with a retaining wall on the seaward side.
140	MDV130895	Ladies' Bathing pool, Ilfracombe	Tunnels were cut through the rocks in 1836 and two seawater bathing pools created, one for men and one for women.
141	MDV23919	Bunch of Grapes Inn, High Street, Ilfracombe	No 36 (bunch of grapes inn), high street. Probably early c19, 3 storey 2 window stucco front, painted. Sash windows with glazing bars. Rusticated ground floor has round-headed arcading with 2 entries and 2 windows. Keystones.
142	MDV23920	Queen's Hotel, High Street, Ilfracombe	No 106 (Queens Hotel), High Street. C18 or early c19 3 storey 4 sash windows with glazing bars and 1 blank panel, 2nd floor. Stucco, lined and painted. 1st floor includes 2 canted splay bays without glazing bars. Rusticated ground floor, central entrance.
143	MDV23921	Victoria Hotel, High Street, Ilfracombe	Victoria Hotel, High Street. Probably contemporary with Queen Victoria's accession. 2 window stucco front, 3 storey and attic. Ground floor has pilaster treatment with entablature, the cornice being returned round the base of the bays to upper floors.
144	MDV61261	Capstone Parade Bandstand, Ilfracombe	Site of original bandstand, which became redundant on construction of new bandstand in 1894.
145	MDV61264	ROAD in the Parish of Ilfracombe	Capstone Parade. During the winter of 1842-3, approx £220 was raised by public subscription, to pay for otherwise unemployed men to cut the capstone parade to provide a level promenade linking the harbour area with Wildersmouth.
146	MDV23841	HOUSE in the Parish of Ilfracombe	Nos 1 and 8, Adelaide Terrace. Circa 1835, 3 storey stucco terrace consisting of 8 2 window houses. Basements and attics. 2 central houses and end houses break forward, the former having combined pediment with oval window in tympanum.
147	MDV103131	Second World War Emergency Water Supply reservoir	A Second World War Emergency Water Supply reservoir is visible on aerial photographs of the 1946 as a structure on land between Sommers Crescent and Arcade Road, Ilfracombe.
148	MDV103132	Second World War Emergency Water Supply reservoir	A Second World War Emergency Water Supply reservoir is visible on aerial photographs of the 1946 as a structure on parkland between High Street and Adelaide Terrace, Ilfracombe.
149	MDV103134	Second World War Buildings, Runnymede Gardens, Ilfracombe	A complex of temporary and prefabricated buildings of probable Second World War date and military function can be seen as structures on the former site of tennis courts, now the site of Runnymede Gardens, Ilfracombe, on aerial photographs of 1946.
150	MDV106710	Drill Hall, Avenue Road, Ilfracombe	Former drill hall.
151	MDV78912	Alexandra Hall, Ilfracombe	Market Hall and Alexandra Hall built 1901.
152	MDV77872	Boundary Wall, Northfield Road, Ilfracombe	Plot boundary wall with evidence for subsequent incorporation of 'lean-to' buildings.

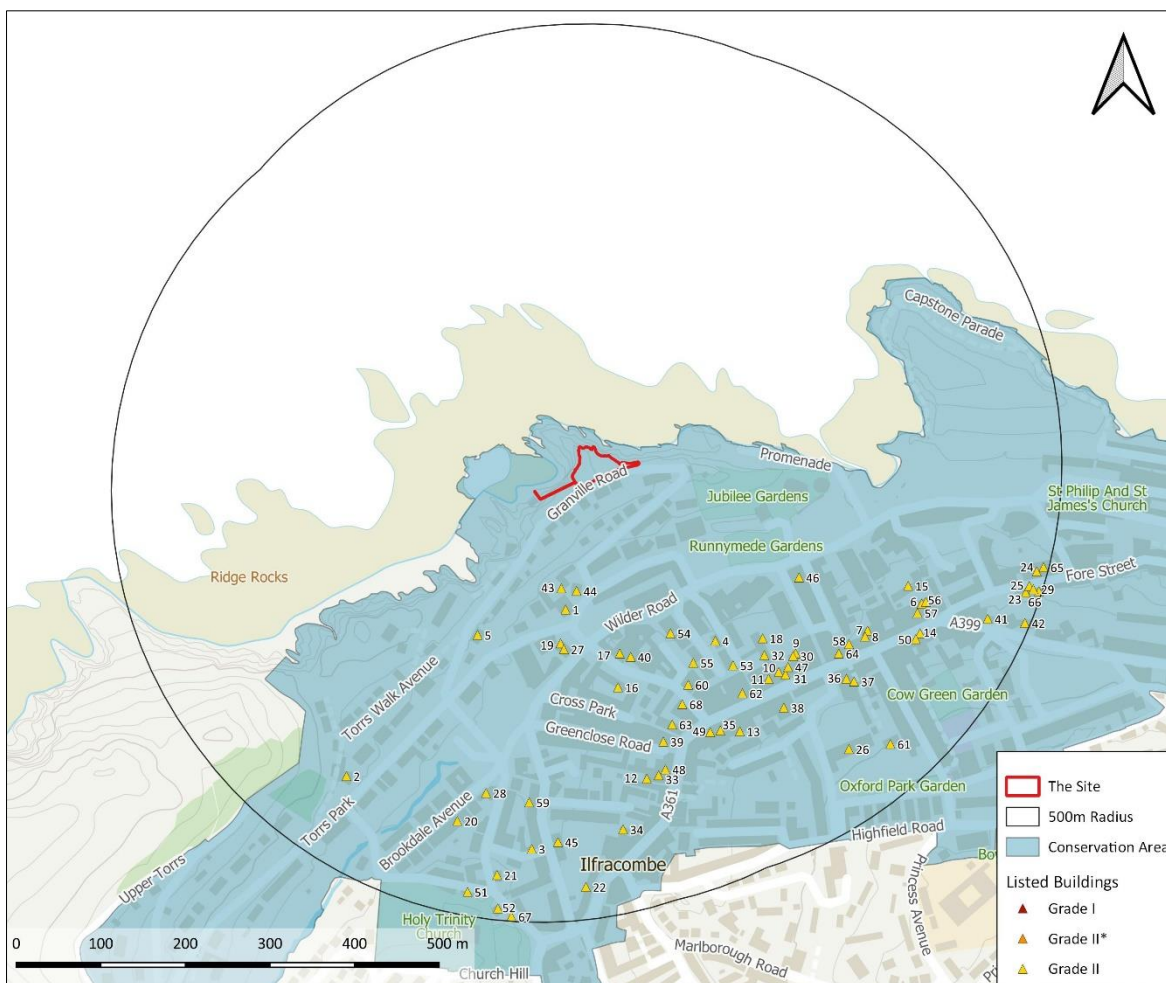


FIGURE 9: DESIGNATED HERITAGE ASSETS WITHIN 500M OF THE PROPOSED SITE. © HISTORIC ENGLAND 2022. CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2022 THE HISTORIC ENGLAND GIS DATA CONTAINED IN THIS MATERIAL WAS OBTAINED ON 12.07.2022. THE MOST PUBLICLY AVAILABLE UP TO DATE HISTORIC ENGLAND GIS DATA CAN BE OBTAINED FROM [HTTP://HISTORICENGLAND.ORG.UK](http://HISTORICENGLAND.ORG.UK).

TABLE 3: TABLE OF DESIGNATED HERITAGE ASSETS (SOURCE: DEVON HER).

No	List Entry	Name	Grade
1	1203007	The Bath House	II
2	1203011	Grey Gables	II
3	1203012	Jack's Dairy	II
4	1203025	Fortescue House	II
5	1203026	Merlin Court Hotel	II
6	1203027	Prince Albert Public House	II
7	1203028	13 And 14, High Street	II
8	1203029	15,16, And 17, High Street	II
9	1203030	26, High Street	II
10	1203031	31, High Street	II
11	1203032	34, High Street	II
12	1203033	53, High Street	II
13	1203034	110,111 And 112, High Street	II
14	1203035	146, High Street	II
15	1203040	Wildersmouth Villa	II
16	1203044	3, Northfield Road	II
17	1203045	Masonic Temple Including Front Area Railings	II
18	1203052	Marine Cottage	II
19	1203053	Attached Garden Wall And Gate Piers	II
20	1203057	6 And 7, Brookdale Avenue	II
21	1203058	Russell House And Attached Garden Walls To North And West	II
22	1203059	Northcote Buildings	II
23	1203061	Waterloo Terrace	II

24	1203062	54, Fore Street	II
25	1203066	Railings To Raised Approach To Numbers 26,27,27a And 28 Waterloo Terrace	II
26	1208025	Attached Railings	II
27	1208043	Attached Garden Walls	II
28	1208133	Brookdale Lodge	II
29	1208267	Waterloo Terrace	II
30	1208595	27, High Street	II
31	1208604	29 And 30, High Street	II
32	1208623	32, High Street	II
33	1208654	52, High Street	II
34	1208664	The Wellington Public House	II
35	1208679	107, High Street	II
36	1208688	132, High Street	II
37	1208700	133, High Street	II
38	1208708	Baptist Church Church Hall	II
39	1208722	The Lantern, Including Former Sunday School,Front Wall And Railings	II
40	1208888	Northfield House	II
41	1208893	Marland	II
42	1208901	Portland House	II
43	1208945	Entrance To Tunnels,Pool And Beaches, Including Flanking Walls And Gate Pier	II
44	1208960	Runnymede House	II
45	1209020	Sandringham	II
46	1209025	Emmanuel Church	II
47	1281868	28, High Street	II
48	1281869	51, High Street	II
49	1281870	The Queen's Public House	II
50	1281871	Langleigh House	II
51	1281873	Osborne House And Attached Garden Wall	II
52	1281883	Holy Trinity Parish Hall And Attached Wall, Railings And Lamp Standard To South And South West	II
53	1281895	11 And 12, Regent Place	II
54	1281899	Berkeley Hotel	II
55	1281904	The Highlands Hotel	II
56	1281905	1 And 2, High Street	II
57	1281906	4, High Street	II
58	1281907	18 And 19, High Street	II
59	1292857	Beaconsfield Terrace	II
60	1292939	8 And 9, Northfield Road	II
61	1292965	Numbers 4 And 5 And Attached Railings	II
62	1293029	Bunch Of Grapes Public House	II
63	1293030	47, High Street	II
64	1293104	The Old Town Hall	II
65	1293207	56 And 56a, Fore Street	II
66	1293242	Waterloo Terrace	II
67	1293264	Wall And Railing By Garden Of Remembrance And Church Of Holy Trinity Parish Hall	II
68	1380020	44, High Street	II



FIGURE 10: HERITAGE INTERVENTIONS WITHIN 500M OF THE PROPOSAL AREA RECORDED IN THE DHER CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2022. THE APPROXIMATE SITE IS INDICATED.

TABLE 4: TABLE OF NEARBY HERITAGE INTERVENTIONS (SOURCE: DEVON HER).

No	Event ID	Event Type	Name
1	EDV4219	Watching Brief	Wilder Road, Ilfracombe
2	EDV4755	Watching Brief	Monitoring of Groundworks on the Site of Brayfield Hotel, Ilfracombe
3	EDV5347	Watching Brief	Watching Brief at St Phillips and St James Church, Ilfracombe
4	EDV5643	Building Survey	Building Recording and Watching Brief, 1-2 High Street

### 3.5 AERIAL PHOTOGRAPHY

Freely available aerial photography (Historic England 2022; not depicted) from the 1920s and 1930s shows that the site has been heavily landscaped, the area of the proposal site forming an area of amenity space with a small patch of open grassland/flowerbed surrounded by footpaths which run the circumference of the site. To the south of the site, on the opposite side of Granville Road, the 1920 aerial photograph shows only Granville Point House as having been constructed, the earliest of the other properties along this part of the road appearing by 1930.

Satellite imagery from 2001 (Figure 11) onwards demonstrates that the site had become overgrown by the end of the 20<sup>th</sup> century, with subsequent images, including 2010 (Figure 12) suggesting that some additional landscaping of at least the central part of the site had taken place in the intervening years. The south-western corner appears the least affected by these works.





FIGURE 11: AERIAL PHOTOGRAPH FROM 2001 (© 2022 INFOTERRA LTD AND BLUESKY). THE APPROXIMATE SITE IS INDICATED.



FIGURE 12: AERIAL PHOTOGRAPH FROM 2010 (© GETMAPPING PLC 2022) THE APPROXIMATE SITE IS INDICATED.

### 3.6 LiDAR DATA

LiDAR data is available at a survey interval of 1m for the site and surrounding area (2020 dataset). The processed LiDAR data available for the site is illustrated below. Digital Terrain Modelling (DTM) attempts to remove any vegetation coverage to present the ground surface beneath. However the 1m sampling interval for this area means that it is unlikely to highlight small features on the ground. LiDAR digital surface model (DSM) and digital terrain model (DTM) (Figures 13 and 14) data has

been processed and examined. The DSM data was of limited use due to vegetation coverage.

Analysis of the LiDAR data indicates that the site has undergone episodes of landscaping and terracing. Several possible earthwork features are apparent, including: a linear bank/wall running south-east to north-west across the middle of the site, turning at its northern end to the north-east, and again to the north-west. At the southern end of this is a rectangular terrace cut suggestive of an entrance/parking area; a raised platform immediately adjacent (possibly a levelled spoil mound). The western side of the site appears to show some mounding of material. None of these features appear to represent the landscaping visible in the early 20<sup>th</sup> century aerial photographs and are likely later in date. The DTM Slope data (Figure 14) also suggests an area of levelling or groundworks has taken place in the northern area of the site.

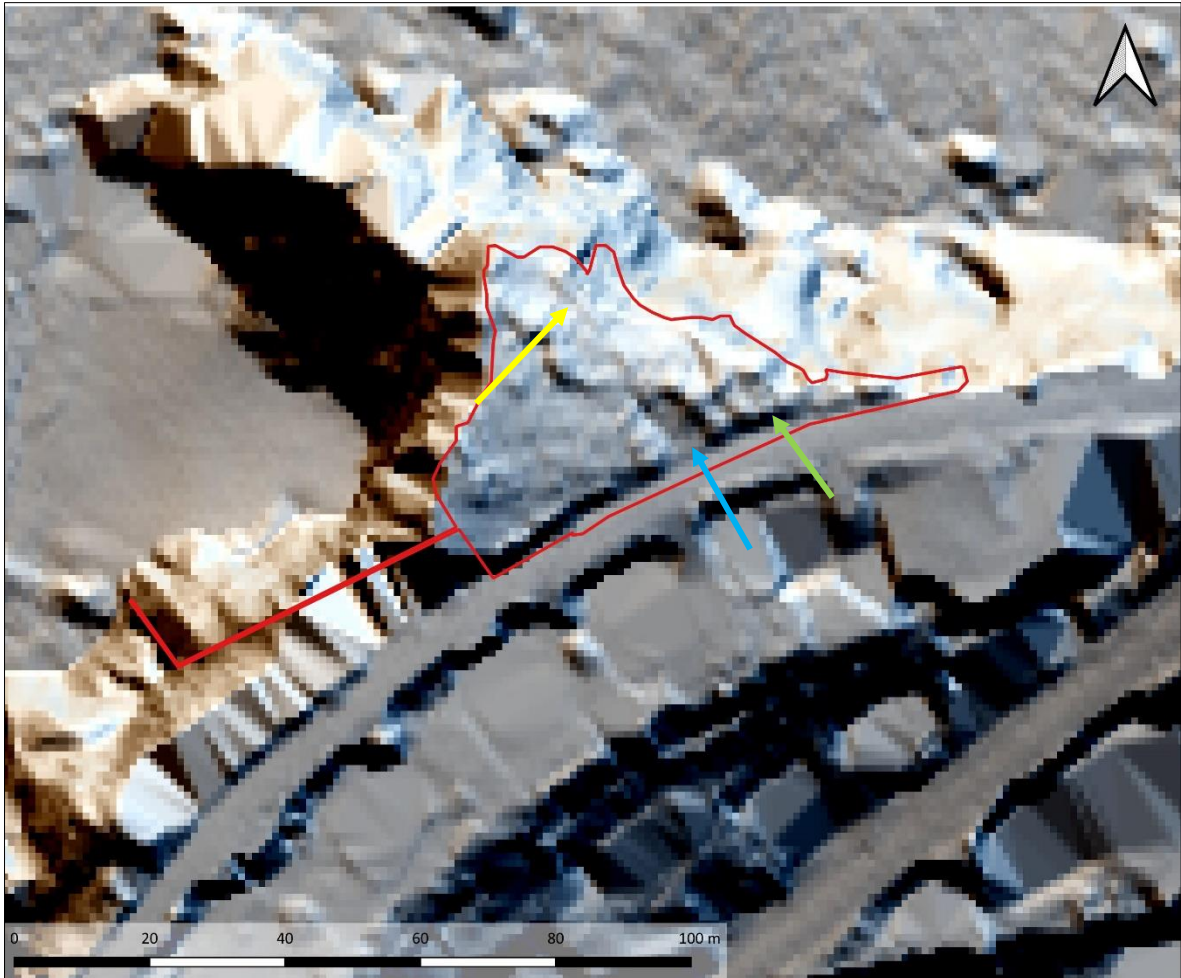


FIGURE 13: 1M LIDAR DTM DATA. PROCESSED USING QGIS 3.22 AND RVT MULTIHILLSHADE 315\_35\_2. CONTAINS ENVIRONMENT AGENCY DATA USED UNDER THE OPEN GOVERNMENT LICENSE 3.0. THE APPROXIMATE SITE IS INDICATED ALONG WITH POSSIBLE BANK/WALL (YELLOW), PLATFORM (GREEN) AND TERRACED PARKING AREA (BLUE)

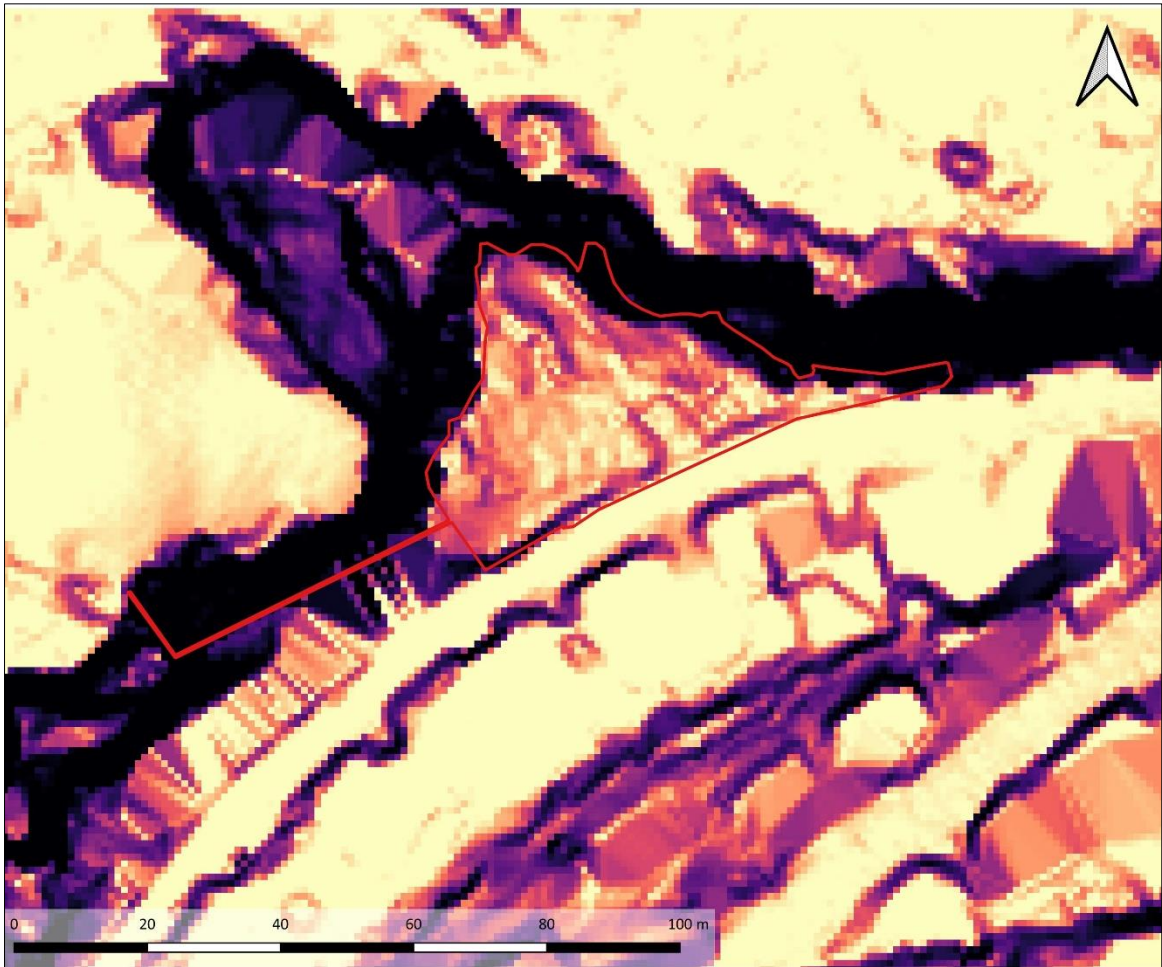


FIGURE 14: 1M LIDAR DTM DATA. PROCESSED USING QGIS 3.22 AND RVT SLOPE Z2. CONTAINS ENVIRONMENT AGENCY DATA USED UNDER THE OPEN GOVERNMENT LICENSE 3.0. THE APPROXIMATE SITE IS INDICATED.

### 3.7 WALKOVER SURVEY

A visual inspection of the site was undertaken on 6<sup>th</sup> December 2022 by P. Webb; the weather was overcast. A full site walkover was not possible as the site had been securely fenced off, though the majority of the area was still visible. The site was under grass with possible earthworks visible across the area. Additional photographs can be found in Appendix 1.

The site (c.0.20ha) consists of a single irregular parcel of land located at the northern limit of the town of Ilfracombe, on a spur of land north of Granville Road. To the north, east and west of the site are the near vertical cliff faces of the coast and the Bristol Channel/Atlantic Ocean. These are separated from the site by a low earthen bank with the remains of an internal concrete post fence line to the north and west; a stone wall forming the eastern boundary. To the south, the site is partially open onto Granville Road (currently overgrown and with Herras fencing in place), the remainder of the boundary formed of the natural rock outcrop and tree/scrub growth.

The surface of the field is uneven, and earthworks are clearly visible, though without site access the full extent/verification of these features is unknown. Mid-way along the southern boundary is a low rectangular platform/terraced area with surrounding banked material.

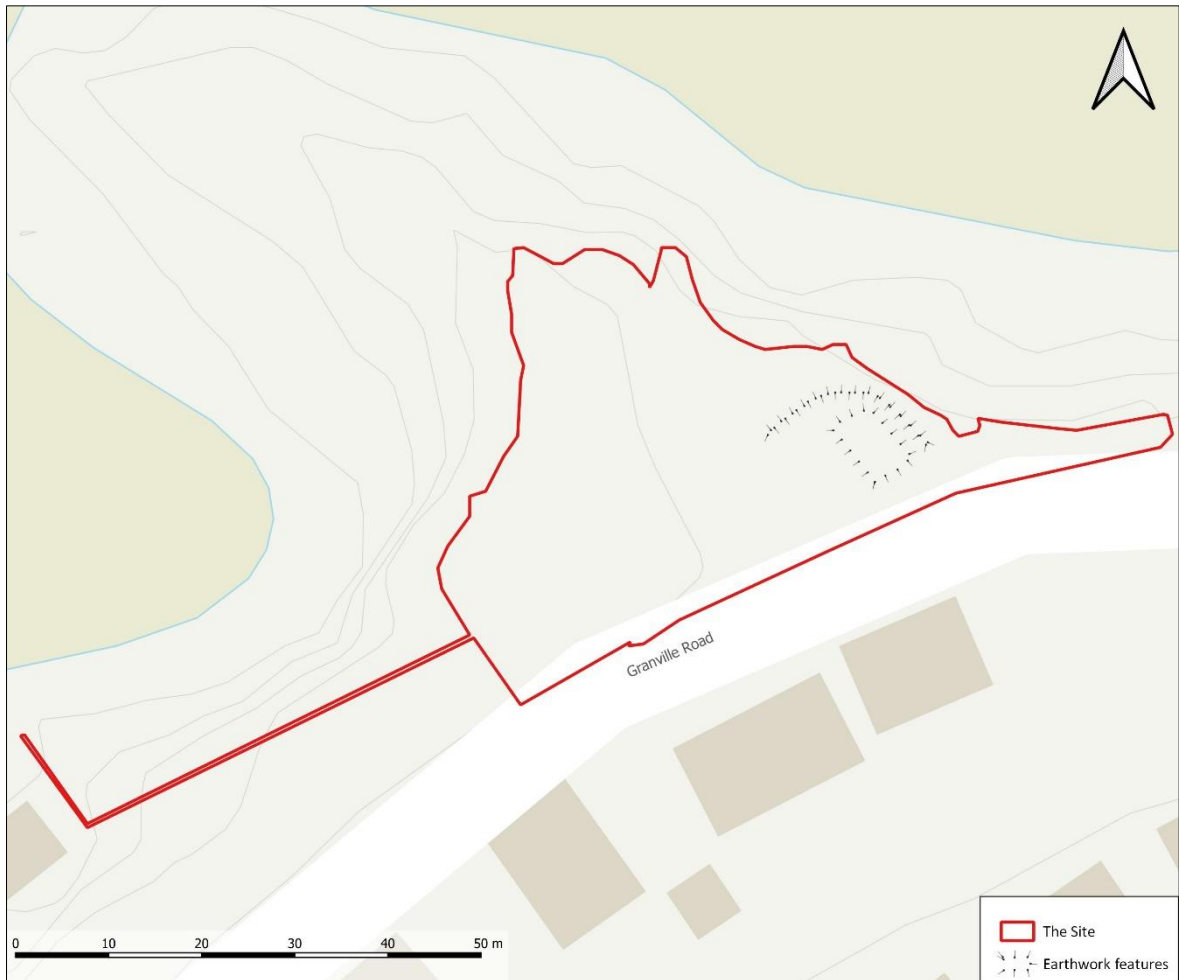


FIGURE 15: SITE LAYOUT SHOWING LOCATION OF IDENTIFIED EARTHWORK FEATURES.



FIGURE 16: VIEW OF EARTHWORK PLATFORM/TERRACE AND SURROUNDING BANKED FEATURE; VIEWED FROM THE EAST-SOUTH-EAST (NO SCALE).

### 3.8 ARCHAEOLOGICAL POTENTIAL AND IMPACT SUMMARY

The direct *effect* of the development would be the possible disturbance or destruction of archaeological features or deposits present within the structure and footprint of the development; the *impact* of the development would depend on the presence and significance of archaeological features and deposits.

The location of the site on what appears to be undeveloped ground in a coastal location means that it has the potential for archaeological deposits of Prehistoric or later date to survive below the ground surface of the proposal site. However, it appears that some landscaping works may have taken place across the site and depending on the extent of these and the depth of any potential archaeological deposits survival may be more limited. The archaeological potential of this site is therefore considered unknown although the value of any archaeological remains could be moderate.

Damage to archaeological deposits would be considered **permanent/irreversible**. Mitigation could be managed through evaluation trenching to assess the potential for survival of any remains or a planning condition for archaeological monitoring and recording during groundworks.

TABLE 5: SUMMARY OF DIRECT IMPACTS.

Asset	Type	Distance	Value	Magnitude of Impact	Assessment	Overall Assessment
Direct Impacts						
Buried archaeological deposits		On site	Unknown	Major Adverse	(potential) Moderate	(potential) Moderate/large adverse
<i>After mitigation</i>						Slight/Moderate adverse

## 4.0 INDIRECT IMPACTS

---

### 4.1 STRUCTURE OF THE ASSESSMENT

For the purposes of this assessment, the *indirect effect* of a development is taken to be its effect on the wider historic environment. The principal focus of such an assessment falls upon identified designated heritage assets like Listed buildings or Scheduled Monuments. Depending on the nature of the heritage asset concerned, and the size, character and design of a development, its effect can impact on designated assets up to 20km away.

The staged approach for the assessment of indirect impacts references the *Setting of Heritage Assets* (Historic England 2017, para 9). 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 (Historic England 2017, para 9):

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.
- 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 (Historic England 2017, para 2, 17, 19, 21, 23, 41), 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.

## 4.2 QUANTIFICATION

A 500m radius has been considered suitable for the assessment of any likely impacts upon heritage assets as a result of the proposed development. There are 68 Listed Buildings, one Conservation Area and no Scheduled Monuments within 500m of the site, though one Scheduled Monument, two Grade I and two Grade II\* Listed structures lie within c.1.5km of the site. Following the site visit, it was decided that the Listed buildings would largely be considered as a group within the Conservation Area rather than as individual assets due to the screening effects of topography. The additional Scheduled Monument and Grade I and II\* Listed structures have also been included following the site visit as the proposals are deemed to have an impact on these assets.

Based on perceived value, location relative to the site, and the extent of the work, Ilfracombe Conservation Area has been treated as a *Category #1* asset along with the Scheduled Monument. The Grade I and II\* Listed structures were treated as *Category #2* assets, whilst all other designated heritage assets within the vicinity of the site were considered as a group within the Conservation Areas following a site visit due to the nature of the assets and due to the limiting effects of visibility of the site to and from their locations as a result of topography and screening effects of other structures.

With an emphasis on practicality and proportionality (see *Setting of Heritage Assets* p15 and p18), only those assets where there is the possibility for an effect greater than negligible (see Table 4 in Appendix 2) are considered here in detail and in summary Table 5. All other Scheduled and Listed assets can be seen listed and mapped in section 3.1, although they have been scoped out of this assessment due to their neutral relationship to the proposed development.

The assets selected for assessment are:

- Category #1 assets: Ilfracombe Conservation Area (including: the Baptist Church & Church Hall, the Bath House, Beaconsfield Terrace, Berkeley House, Brookdale Lodge, Bunch of Grapes Public House, Emmanuel Church, Entrance to Tunnels pool & beaches including flanking walls & gate pier, Fortescue House, Grey Gables, the Highlands Hotel, Holy Trinity Parish Hall & attached wall railings & lamp, Jack's Dairy, Langleigh House, The Lantern including Former Sunday School front wall & railings, Marine Cottage, Marland, Masonic Temple including front area railings, Merlin Court Hotel, Northcote Buildings, Northfield House, the Old Town Hall, Osborne House and attached garden wall, Portland House, Prince Albert Public House, the Queen's Public House, Runnymede House, Russel House and attached garden walls, Sandringham, Waterloo Terrace/26 Fore Street, Waterloo Terrace/27a Fore Street, Waterloo Terrace/27 & 28 Fore Street, the Wellington Public House, Wildersmouth Villa, 6 & 7 Brookdale Avenue, 54 Fore Street, 56 & 56a Fore Street, 8 & 9 Northfield Road, 1 & 2 High Street, 4 High Street, 13 & 14

High Street, 15, 16 & 17 High Street, 18 & 19 High Street, 26 High Street, 27 High Street, 28 High Street, 29 & 30 High Street, 31 High Street, 32 High Street, 34 High Street, 44 High Street, 47 High Street, 51 High Street, 52 High Street, 53 High Street, 107 High Street, 110, 111 & 112 High Street, 132 High Street, 133 High Street, 146 High Street, 4 & 5 Meridian Place & attached railings, 3 Northfield Road, 11 & 12 Regent Place, the attached garden wall and gate piers to 1 & 2 Bath Place, the attached railings to 1-8 Adelaide Terrace, the railings to the raised approach to 26, 27, 27a & 28 Waterloo Terrace and the wall and railing by the Garden of Remembrance and Church of Holy Trinity Parish Hall); SAM Hillsborough Promontory Fort.

- Category #2 assets: Grade I Listed Chapel of St Nicholas & lighthouse and Church of Holy Trinity; and the Grade II\* Listed Church of St Philip & St James.
- Category #3 assets: all other assets within 500m of the site.

### 4.3 IMPACT BY CLASS OF MONUMENT OR STRUCTURE

#### 4.3.1 CHURCHES AND PRE-REFORMATION CHAPELS

*Church of England parish churches and chapels; current and former places of worship*

Most parish churches tend to be associated with a settlement (village or hamlet), and therefore their immediate context lies within the setting of the village (see elsewhere). Church buildings are usually Grade II\* or Grade I Listed structures, on the basis they are often the only surviving medieval buildings in a parish, and their nature places of religious worship.

In more recent centuries the church building and associated structures functioned as *the* focus for religious devotion in a parish. At the same time, they were also theatres of social interaction, where parishioners of differing social backgrounds came together and renegotiated their social contract.

In terms of setting, many churches are still surrounded by their churchtowns. Viewed within the context of the settlement itself, churches are unlikely to be affected by the construction of residential developments unless it is to be located in close proximity. The location of the church within its settlement, and its relationship with these buildings, would remain unchanged: the church often being the visual focus on the main village street.

This is not the case for the church tower. While these structures are rarely open to the public, in rural communities they are frequently the most prominent visual feature in the landscape, especially where the church is itself located in a topographically prominent location. The towers of these structures were clearly *meant* to be highly visible, ostentatious reminders of the presence of the established church with its message of religious dominance/assurance. However, churches were often built and largely maintained by their laity, and as such were a focus for the *local* expression of religious devotion. It was this local devotion that led to the adornment of their interiors and the elaboration of their exteriors, including the tower.

Where parishes are relatively small, the tower would be visible to the residents of multiple parishes. This would have been a clear expression of the religious devotion – or rather, the competitive piety – of a particular social group. This competitive piety that led to the building of these towers had a very local focus, and very much reflected the aspirations of the local gentry. If the proposed development is located within the landscape in such a way to interrupt line-of-sight between church towers, or compete with the tower from certain vantages, then it would very definitely impact on the setting of these monuments.

As the guidance on setting makes clear, views from or to the tower are less important than the contribution of the setting to the significance of the heritage asset itself. The higher assessment for the tower addresses the concern it will be affected by a new and intrusive element in this landscape.



Churchyards often contained Listed gravestones or box tombs, and associated yard walls and curtilage are usually also Listed. The setting of all of these assets is usually extremely local in character, and local blocking, whether from the body of the church, church walls, shrubs and trees, and/or other buildings, always plays an important role. As such, the construction of a wind turbine is unlikely to have a negative impact.

### What is important and why

Churches are often the only substantial medieval buildings in a parish, and reflect local aspirations, prosperity, local and regional architectural trends; they usually stand within graveyards, and these may have pre-Christian origins (evidential value). They are highly visible structures, identified with particular geographical areas and settlements, and can be viewed as a quintessential part of the English landscape (historical/illustrative). They can be associated with notable local families, usually survive as places of worship, and are sometimes the subject of paintings. Comprehensive restoration in the later 19<sup>th</sup> century means many local medieval churches are associated with notable ecclesiastical architects (historical/associational). The 19<sup>th</sup> century also saw the proliferation of churches and parishes in areas like Manchester, where industrialisation and urbanisation went hand-in-hand. Churches are often attractive buildings that straddle the distinction between holistic design and piecemeal/incremental development, all overlain and blurred with the 'patina of age' (aesthetic/design and aesthetic/fortuitous). They have great communal value, perhaps more in the past than in the present day, with strong commemorative, symbolic, spiritual and social value.

Asset Name: <b>Chapel of St Nicholas with Lighthouse, Lantern Hill</b>	
<i>Parish:</i> Ilfracombe	<i>Value:</i> High
<i>Designation:</i> GI	<i>Distance to Development:</i> c.930m.
<p><i>Description: Listing:</i> (List Entry no 1208792) Chapel (now disused) incorporating a lighthouse lantern, situated on a high rock, known as Lantern Hill, between the sea and harbour. Possibly C14 and known to be in existence by early C15. By the time of Henry VIII used as a lighthouse but present lantern C18/early C19. Rubble, part rendered and slated roofs, that over western chancel lower and crowned by lantern. Bulging west end an early C20 reinforcement covering the original wall behind with 2 lancet windows. Rectangular plan approx. 31'6" x 13'3" internally; reverse orientated with gabled rubble porch at east end, lit by windows and having plank door, and lean-to porch on south elevation with sash window to right. North elevation has a sash and a casement window and roof dormer. To right, the projecting base of a presumed turret including the window sill. Octagonal lantern with ogee roof surmounted by a copper fish-shaped weather vane with cut-out letter "B" and date "1819".</p> <p>Interior not inspected but believed to retain C18 internal fittings. Date of closure for worship not known but seems to have been used for various purposes over last 200 years; during the C19 it was used as a dwelling house, reading room and laundry. This chapel is a prominent and important feature of the harbour.</p>	
<p><i>Conservation Value:</i> The chapel has a complex developmental history and inherently holds evidential value, also aesthetically pleasing and of simple medieval style.</p>	
<p><i>Authenticity and Integrity:</i> Whilst repaired/restored during the 18<sup>th</sup> to 20<sup>th</sup> centuries, and converted to a dwelling, the external character of the chapel remains.</p>	
<p><i>Setting:</i> The chapel stands at the summit of a small spur of land towards the eastern end of the town, close to the harbour. It overlooks Ilfracombe and, more importantly, the mouth of the Bristol Channel. It is bounded by stone walls and sits isolated from the town.</p>	
<p><i>Contribution of Setting to the Significance of the Asset:</i> Intentional. The prominent elevated location is vital for its primary function, as a lighthouse, the ability to shine light over the surrounding rocks of paramount importance for the sailors and fisherman using the harbour. The chapel stands as a visual marker to the piety of the local community, its original setting having little changed over the centuries with only minimal surrounding development since its construction.</p>	
<p><i>Magnitude of Effect:</i> The site of the proposed development is clearly visible from the chapel. Whilst there would be a change in function of the land, the development replacing an open undeveloped space, this</p>	

would be at the edge of existing development. Whilst it would appear as a growth of this rather than a wholly new intrusion, it would stand out in the skyline particularly given the contrasting architectural design compared to the other visible buildings. Indirect effects may be an increase in traffic with resultant audio-visual pollution, particularly larger vehicles during the construction phase, though distance and the effects of the working harbour would limit this.

*Magnitude of Impact:* High value asset and Minor Adverse effect = Moderate/Slight impact

*Overall Impact Assessment:* **Moderate Adverse**



FIGURE 17: VIEW ACROSS THE ILFRACOMBE CONSERVATION AREA AND COASTAL ROCKS FROM THE CHAPEL OF ST NICHOLAS WITH LIGHTHOUSE. THE POSITION OF THE PROPOSAL SITE IS INDICATED; VIEWED FROM THE EAST.

<b>Asset Name: Church of Holy Trinity (including Boundary Walls, Lychgate and Parish Hall)</b>	
<i>Parish:</i> Ilfracombe	<i>Value:</i> High
<i>Designation:</i> GI	<i>Distance to Development:</i> 545m.
<p><i>Description: Listing:</i> (List entry no. 1293231) Anglican parish church. Transeptal tower and other masonry C13; enlarged c1321 by order of Bishop Stapledon (lengthening of the nave and addition of aisles); aisles widened C15; N chancel aisle added C15; restoration by John Hayward, 1861-4. Vestry, 1894 by Henry Wilson.</p> <p><i>Materials:</i> mostly random rubble slate walls, some rendered; limestone dressings; Welsh slate roof.</p> <p><i>Plan:</i> nave with aisles of 4 bays; chancel of 4; N and S chancel aisles; N transeptal tower (now partially internal due to widening of N aisle); SE vestries.</p> <p><i>Exterior:</i> windows entirely renewed by Hayward, mostly 4-light in conventional Perpendicular style. One or two dressed features survive from before this time including a small blocked window set low at W end of S aisle. Sundial dated 1788 over porch doorway. Plaque dated 1864 commemorates rebuilding of S wall. Storeyed vestries set transeptally with polygonal stair turret; 2-light window to each floor, that to 1st under moulded pointed arch. The strangely detailed doorway arch, the rainwater hopper and the weather vane on the small spire that surmounts the turret are free Arts and Crafts in style (cf the lych gate to S also by Wilson).</p> <p><i>Interior:</i> fully described in Pevsner and Cherry. Special attention may be drawn to the fine set of wagon roofs, substantially renewed and adapted over the chancel by Fellowes Prynne in 1899. Nave roof rests on stone corbels representing mythical beasts that may be older than the timber roof. The Victorian glass (all</p>	

attributed in Pevsner and Cherry) form an extremely interesting and varied collection.

*Conservation Value:* The church has a complex developmental history and inherently holds evidential value, also aesthetically pleasing and of decorative medieval style. The church is of local communal value, a serving parish church.

*Authenticity and Integrity:* Whilst added to and repaired/restored several times in the 14<sup>th</sup>, 15<sup>th</sup> and 19<sup>th</sup> centuries, the medieval character of the church has been preserved.

*Setting:* The church stands at the north-eastern end of its enclosed graveyard, both bounded by stone walls. It sits raised above much of Ilfracombe, towards the summit of a hillside overlooking the core of the settlement; with the Torrs rising behind to the west/south-west.

*Contribution of Setting to the Significance of the Asset:* Intentional. The church stands as a visual marker to the piety of the local community, its original setting having little changed over the centuries with only minimal development. The churchyard contains associated historic Listed assets including the lychgate, boundary walls and World War I memorial. There is the additional aspect of the appearance of the church, creating a 'green' space within the densely packed structures of the surrounding settlement provides an area of peace to its users.

*Magnitude of Effect:* The site of the proposed development is clearly visible from parts of the church and graveyard, and from the top of the church tower, though views of the church from the site are partially screened by local topography and buildings. Whilst there would be a change in function of the land, the development replacing an open undeveloped space, this would be at the edge of existing development. Whilst it would appear as a growth of this rather than a wholly new intrusion, it would be visible against the skyline and would stand out with its contrasting architectural style. Indirect effects may be an increase in traffic with resultant audio-visual pollution, particularly larger vehicles during the construction phase.

*Magnitude of Impact:* High value asset and Negligible Adverse effect = Slight impact

*Overall Impact Assessment:* **Minor Adverse**



FIGURE 18: VIEW TOWARDS THE PROPOSAL SITE FROM THE CHURCH OF HOLY TRINITY (AND ASSOCIATED MONUMENTS). THE POSITION OF THE PROPOSAL SITE IS INDICATED; VIEWED FROM THE SOUTH-SOUTH-WEST.

Asset Name: <b>Church of St Philip and St James</b>	
<i>Parish:</i> Ilfracombe	<i>Value:</i> High
<i>Designation:</i> GII*	<i>Distance to Development:</i> c.585m.
<p><i>Description: Listing:</i> (List entry no. 129875) Anglican church. 1856 by John Hayward. Geometrical Decorated style.</p> <p><i>Materials:</i> snecked rubble with ashlar dressings; Welsh slate roof with fishscale banding to spire.</p> <p><i>Plan:</i> Nave of 5 bays (with narthex), aisles, N porch, N transeptal steeple and S transeptal organ chamber, chancel, N chancel aisle, SE vestry.</p> <p><i>Exterior:</i> W end with 2 paired lights under cusped roundel flanked by buttresses with set-offs which project to clasp narthex which has 2 doorways to either side of a window (formerly a doorway). 3-light aisle windows. 2-light windows to aisles and spherical triangular windows to clerestory. Porch with heavy low buttresses and contemporary wooden gates. N chancel aisle with taller 2-light windows and more elaborate moulded surrounds and ball-flower to cornice. Prominent steeple: 3-stage tower with angle buttresses which to the NE incorporate the stair turret; deeply recessed 2-light belfry openings; cornice and pyramidal spire. 5-light E window.</p> <p><i>Interior:</i> nave piers alternating octagonal and circular in section, capitals with naturalistic foliage carving, moulded arches under continuous hood mould. Clerestory windows in richly moulded surrounds with shafts and hood-moulds and sills with ball-flowers. Internal shafting also to aisle windows. Arch-braced roof with collars, ashlar pieces and wind braces, 2 sets of side purlins and shafts on foliated stone corbels. Chancel: 3-bay arcade to N with polished limestone circular section piers, foliated capitals. Roof as to nave. S arch gives access to organ chamber.</p> <p><i>Fittings:</i> stone reredos, a 2:3:2 gabled arcade with richly crocketed and finialed framing texts on slate, forms a single ensemble with the 2-seat sedilia to S. Pulpit, marble, polygonal with open arcaded panels, cornice and corner shafts to bowl and brass rails to polished limestone steps. Brass eagle lectern. Communion rail with barley-sugar stems, some clustered in groups of four, and foliated angle brackets. Font: square section with chamfered corners, the bowl with tapering profile and incised Celtic crosses all on four marble shafts and large central pier. Wooden seating with traceried frontals and ends.</p> <p><i>Stained glass:</i> W (commemoration date, 1857) with 4 Evangelists and their symbols; E, Scenes from the Life of Christ in shaped panels against decorated background. Full complement of 1850s glass to chancel aisle and sanctuary windows by different makers.</p> <p>An excellent church for its date in a serious Ecclesiologically 'correct' style with a full set of fittings. "The Ecclesiologist" considered it to be one of the finest churches that had been built in north Devon in the C19, by an architect whom elsewhere the journal had called one of the best then working in England.</p>	
<p><i>Conservation Value:</i> The church has a simple developmental history and inherently holds evidential value, also aesthetically pleasing and of decorative style, with links to a well known architect. The church is of local communal value, a serving parish church and community space.</p>	
<p><i>Authenticity and Integrity:</i> Appears largely unaltered in appearance.</p>	
<p><i>Setting:</i> The church stands at the eastern end of its enclosed graveyard, both bounded by stone walls. It sits at a low level within Ilfracombe, directly visible along the seafront and overlooked by the surrounding town.</p>	
<p><i>Contribution of Setting to the Significance of the Asset:</i> Intentional. The church stands as a visual marker to the piety of the local community, its original setting having little changed over the centuries with only minimal surrounding development since its construction. The churchyard allows it to sit apart from the surrounding town, despite being within the core of the settlement.</p>	
<p><i>Magnitude of Effect:</i> The site of the proposed development is clearly visible from the church. Whilst there would be a change in function of the land, the development replacing an open undeveloped space, this would be at the edge of existing development. Whilst it would appear as a growth of this rather than a wholly new intrusion, it would stand out in the skyline especially with its contrasting architectural style. Indirect effects may be an increase in traffic with resultant audio-visual pollution, particularly larger vehicles during the construction phase, though distance is likely to limit this.</p>	
<p><i>Magnitude of Impact:</i> High value asset and Minor Adverse effect = Moderate/Slight impact</p>	
<p><i>Overall Impact Assessment:</i> <b>Moderate Adverse</b></p>	



FIGURE 19: VIEW ACROSS THE ILFRACOMBE CONSERVATION AREA FROM THE CHURCH OF ST PHILIP & ST JAMES. THE POSITION OF THE PROPOSAL SITE IS INDICATED; VIEWED FROM THE EAST.

#### 4.3.2 HILLFORTS

##### *Hillforts, tor enclosures, cross dykes, promontory forts*

Hillforts are large embanked enclosures, most often interpreted as fortifications, and usually occupy defensible and/or visually prominent positions in the landscape. They are typically visible from all or most of the surrounding lower and higher ground, with the corollary that they enjoyed extensive views of the surrounding countryside. As such, they are as much a visible statement of power as they are designed to dissuade or repel assault. The location of these sites in the landscape must reflect earlier patterns of social organisation, but these are essentially visual monuments. They are designed to see and be seen, and thus the impact of wind turbines is often disproportionately high compared to their height or proximity.

Promontory forts are a type of hillfort in which conspicuous naturally defended sites are adapted as enclosures by the construction of one or more earth or stone ramparts placed across the neck of a spur in order to divide it from the surrounding land. Coastal situations, using headlands defined by steep natural cliffs, are common while inland similar topographic settings defined by natural cliffs are also used. The ramparts and accompanying ditches formed the main artificial defence, but timber palisades may have been erected along the cliff edges. Access to the interior was generally provided by an entrance through the ramparts. The interior of the fort was used for settlement and related activities, and evidence for roundhouses can be expected, together with the remains of buildings used for storage and enclosures for animals. Promontory forts are generally Iron Age in date, most having been constructed and used between the sixth century BC and the mid-first century AD and are broadly contemporary with other types of hillfort. They are regarded as the retreats of the social elite, and/or the focus of communal activities, probably occupied on a permanent basis, and recent interpretations suggest that their construction and choice of location had as much to do with display as defence.

Tor enclosures are less common, and usually only enclose the summit of a single hill; the enclosure

walls is usually comprised of stone in those instances. Cross dykes and promontory forts are rather similar in nature, being hill spurs or coastal promontories defended by short lengths of earthwork thrown across the narrowest point. Both classes of monument represent similar expressions of power in the landscape, but the coastal location of promontory forts makes them more sensitive to visual intrusion along the coastal littoral, due to the contrast with the monotony of the sea. Linear earthworks are the cross dyke writ large, enclosing whole areas rather than individual promontories. The investment in time and resources these monuments represent is usually far greater than those of individual settlements and hillforts, requiring a strong centralised authority or excellent communal organisation.

Asset Name: <b>Hillsborough Promontory Fort</b>	
Parish: Glynde	Value: High
Designation: SAM	Distance to Development: c.1.40km
<p><i>Description:</i> Listing: (List entry no. 1002512) Principal elements: This Iron Age promontory fort has a commanding position on a natural headland at Hillsborough to the east of Ilfracombe. It is defined by the steep cliffs and slopes of the headland except on its south, landward side where a series of banks cross the neck of the promontory, enclosing a roughly triangular-shaped interior which rises towards the central spine of the promontory.</p> <p>Description: The enclosure is defined along the neck (south) of the headland, where natural defence is weak, by two artificially-scarped and roughly parallel banks, probably of earth and stone. They survive in some places as low scarps and diverge towards their eastern ends. They are aligned roughly north-west to south-east, following the natural topographic contours of the promontory, and are approximately 265m in length. The ramparts terminate short of the sides of the headland and the eastern end of the lower one has been removed by late-C19 quarrying. A LiDAR survey (2007) produced evidence for a ditch or secondary scarp below the eastern end of the lower rampart. Access to the interior was provided by an inturned entrance which cuts through both the upper and lower ramparts towards their eastern ends. To the south-west of the entrance, a geophysical survey (Substrata, 2012) identified a circular structure which has been interpreted as a possible roundhouse. It measures some 7.8m in diameter and will survive in the form of buried archaeological deposits.</p> <p>The interior of the fort measures some 360m north to south by 310m west to east at its widest point. No excavation of the interior has been carried out, but three flint tools, now at the Ilfracombe Museum are said to have been recovered from the fort. A geophysical survey of part of the interior in 2011 did not identify any clear archaeological features, but this may be due to the underlying geology, and it is likely that features such as possible structures, ditches, postholes and pits may survive as buried features. A stone chamber, possibly a cist, was discovered in the upper rampart in 1937 and described as constructed of drystone masonry surmounted by a lintel. Although it can no longer be identified on the ground, the remains of a stone slab and possible evidence of slumping may mark its location.</p>	
<p><i>Conservation Value:</i> Listed for its value as a prehistoric site, providing the potential for evidence of settlement and economy of the time; and its position within a wider changing historical context for each of these features. There will be aesthetic value in its rugged landscape setting.</p>	
<p><i>Authenticity and Integrity:</i> There are surviving earthwork features and the promontory fort is clearly identifiable on a landscape scale. Geophysical and LiDAR identified further defensive and settlement features. The landscape setting of the promontory fort is still clear, the hilltop dominating the surrounding landscape.</p>	
<p><i>Setting:</i> The site covers the summit of a substantial hill and ridge which dominates the wider landscape and is visible from other surrounding hilltops. Despite some woodland and vegetation on the hilltop, the monument is clearly visible.</p>	
<p><i>Contribution of Setting to the Significance of the Asset:</i> Intentional. The hilltop setting of the promontory fort, a former defensive enclosure, is paramount to its form and function.</p>	
<p><i>Magnitude of Impact and Effect:</i> The site of the proposed development is clearly visible from across the promontory fort, the prominent location and architectural character of the proposals meaning that they will be visible despite distance reducing this visibility from the monument. Whilst there would be a change in function of the land, from undeveloped grassland to residential, this would sit on the edge of existing development and the proposals would appear as an extension of this, though it would still stand out in the skyline. Indirect effects may be an increase in traffic with resultant audio-visual pollution, particularly larger vehicles during the</p>	

construction phases, though the distance to the site means that this will be minimal.
<i>Magnitude of Impact:</i> High value asset + Negligible Adverse effect = Slight impact
<i>Overall Impact Assessment:</i> <b>Negligible Adverse</b>



FIGURE 20: VIEW ACROSS ILFRACOMBE FROM HILLSBOROUGH PROMONTORY FORT. THE POSITION OF THE PROPOSAL SITE IS INDICATED; VIEWED FROM THE EAST.

#### 4.3.3 LISTED COTTAGES AND STRUCTURES WITHIN HISTORIC SETTLEMENTS

*Clusters of Listed Buildings within villages or hamlets; occasionally Conservation Areas*

The context of the (usually) Grade II Listed buildings within settlement is defined by their setting within the village settlement. Their significance is determined by their architectural features, historical interiors or role/function in relation to the other buildings. The significance of their setting to the experience of these heritage assets is of key importance and for this reason the curtilage of a property and any small associated buildings or features are often included in the Listing and any changes must be scrutinised under relevant planning law.

Most village settlements have expanded significantly during the 20<sup>th</sup> century, with rows of cottages and modern houses and bungalows being built around and between the older 'core' Listed structures. The character of the settlement and setting of the heritage assets within it are continually changing and developing, as houses have been built or farm buildings have been converted to residential properties. The setting of these heritage assets within the village can be impacted by new residential developments especially when in close proximity to the settlement. The relationships between the houses, church and other Listed structures will not be altered, and it is these relationships that define their context and setting in which they are primarily to be experienced.

The larger settlements and urban centres usually contain a large number of domestic and commercial buildings, only a very small proportion of which may be Listed or protected in any way. The setting of these buildings lies within the townscape, and the significance of these buildings, and

the contribution of their setting to that significance, can be linked to the growth and development of the individual town and any associated industries. The original context of any churches may have changed significantly since construction, but it usually remains at the heart of its settlement. Given the clustering of numerous individual buildings, and the local blocking this inevitably provides, a distant development is unlikely to prove particularly intrusive.

### What is important and why

Historic settlements constitute an integral and important part of the historic landscape, whether they are hamlets, villages, towns or cities. The physical remains of previous occupation may survive beneath the ground, and the built environment contains a range of vernacular and national styles (evidential value). Settlements may be archetypal, but development over the course of the 20<sup>th</sup> century has homogenised most, with streets of terraced and semi-detached houses and bungalowoid growths arranged around the medieval core (limited historical/illustrative value). As dynamic communities, there will be multiple historical/associational values relating to individuals, families, occupations, industry, retail etc. in proportion to the size and age of the settlement (historical/associational). Settlements that grew in an organic fashion developed fortuitously into a pleasing urban environment (e.g. Ledbury), indistinguishable suburbia, or degenerate urban/industrial wasteland (aesthetic/fortuitous). Some settlements were laid out quickly or subject to the attention of a limited number of patrons or architects (e.g. late 19<sup>th</sup> century Redruth and the architect James Hicks, or Charlestown and the Rashleigh family), and thus strong elements of design and planning may be evident which contribute in a meaningful way to the experience of the place (aesthetic/design). Component buildings may have strong social value, with multiple public houses, clubs, libraries (communal/social), chapels and churches (communal/spiritual). Individual structures may be commemorative, and whole settlements may become symbolic, although not always in a positive fashion (e.g. the Valleys of South Wales for post-industrial decline) (communal/symbolic). Settlements are complex and heterogeneous built environments filled with meaning and value; however, beyond a certain size threshold distant sight-lines become difficult and local blocking more important.

Almost every village or town will have a public house, usually several. They may have been specially constructed perhaps by a landowning industrialist as a means of profiting from travellers or his own workforce; or arose organically, being converted from a residential property. Their setting is often local in character, along thoroughfares with a clear concern for visibility from the road. An important facet of these buildings is its communal value: places where disparate elements of the population could meet and serving as a focus for local sentiment.

<b>Asset Name: Ilfracombe Conservation Area</b>	
<i>Parish:</i> Ilfracombe	<i>Value:</i> Medium
<i>Designation:</i> CA	<i>Distance to Development:</i> Within
<p>Summary: The Ilfracombe Conservation Area is a large area encompassing much of the town and surrounding coastline to the west and east. It extends southwards to include the Torrs Park development. The Conservation Area is divided by the Ilfracombe Conservation Area Appraisal document into three zones, each with their own character: The Seafront Character Zone, The High Street Character Zone and The Torrs Park Character Zone. The proposal site lies in a detached part of The Torrs Park Character Zone. The Conservation Area appraisal description of this zone states: <i>The area was the result of planned development and expansion of the town and as such it has a great degree of consistency of scale and massing between its buildings which are very distinct from the rest of the conservation area. The area's buildings follow the pattern of large villas in substantial open plots with a much lower development density, with a number of examples being semi-detached versions of the theme. Despite the degree of consistency the buildings have a variety of dates and budgets and a number of different architects are represented, so the style of the buildings lends variety to the area. There is also variation in the style adopted by the buildings; some are clearly inspired by the High Victorian love of gothic, others have a noticeable Swiss flavour, while others are of French Chateaux or Renaissance style. A few of the buildings skilfully mix architectural components of several styles to create something new all of their own. The area differs in one major respect from east to west; at the east end of Torrs Park there is significantly less vegetation, in terms of trees and hedges, around the buildings and</i></p>	



*separating the various plots. Towards the west of the character zone trees become much more common, with buildings gradually becoming hidden from view of the street.*

*The character zone also has a low proportion of listed buildings compared to the remainder of the Ilfracombe Conservation Area, which is mainly due to the way in which the process of selecting buildings worthy of listing works. After 1840 buildings must be outstanding examples of their type, the works of great and noteworthy architects, or survive in a relatively unaltered state with a high degree of retention of historic features. As all of the Torrs Park development is post 1860 these tighter requirements apply and so the 5 listed buildings in the area can be seen as reflecting the very best of High Victorian architecture and craftsmanship.*

*One of the key buildings within this zone of the Conservation Area is the Granville Hotel which lies adjacent to the proposed site: *The Granville Hotel*, recently converted to apartments, was designed by W.H. Gould and Allen T. Hussell for a William Robert Foster who moved to the town from Oxfordshire. The hotel first opened in June of 1891. The building is in a Scottish style, itself a development of the French chateaux styles. Its imposing position overlooking the sea together with its castle like architectural style give it a defensive appearance. The building is a good example of the use of the relatively poor local stone, dressed with Marland bricks. Towers topped with battlements, oriel windows and bays add some architectural finishing touches to the design. The recent conversion works have been largely respectful of the character of the building. However some attempts to 'even up' the building and give it a degree of symmetry are contrary to the intentions of the design. Extensive cleaning of the building has robbed it of some of its imposing character and over the years various components, including a spire, have been removed. Despite this the bulk of the building still makes a prominent landmark, crowning the cliffs on which it stands and can be seen from many locations throughout the town.*

**Key Views:** The Ilfracombe Conservation Area appraisal identifies a number of key views both into and out from the Conservation Area. These include views from Capstone into the Conservation Area to the south west, south and south east, views from The Torrs towards the town and a number of key internal views between and along streets within the Conservation Area.

**Conservation Value:** The Conservation Area holds evidential value within its buildings and historical narrative value in the development of Ilfracombe as a prosperous market, industrial and tourist town. As a whole the Conservation Area has communal value as a number of the buildings within it had public access e.g. as shops, churches etc. It also holds aesthetic value with a number of buildings, streetscapes and viewpoints which contribute significantly to the historic character of the settlement. It has historical associative value with the architects known to have been involved in the design of many of the 19<sup>th</sup> century buildings (e.g. W. C. Oliver, J. H. Huxtable, W.H. Gould, W. M Robbins, and Allen. T. Hussell).

**Authenticity and Integrity:** Although the functions of many of the shops may have changed in the last century and a number of hotels have been lost or converted to other uses, many of the buildings in the Conservation Area exhibit high authenticity and integrity. Within the Conservation Area there are two Grade I Listed Buildings and two Grade II\* Listed Buildings. There are over 100 Grade II Listed Buildings within the Conservation Area.

**Setting:** The Conservation Area appraisal highlights key views in and out of the Conservation Area which provide its setting and contribute to its significance. The main identified key view with regards to the proposed development is the view from Capstone towards the Granville Hotel. The proposed development site lies just to the right hand side of the Granville Hotel in this view. The setting of the western part of the Conservation Area is framed by the North Devon Coast AONB.

**Contribution of Setting to the Significance of the Asset:** The setting of the Conservation Area is generally considered to be of considerable importance in better revealing its significance. The Ilfracombe Conservation Area is largely surrounded by high quality landscapes which not only contribute to the significance of the Conservation Area though the setting they provide but also provide a setting for those landscapes.

**Magnitude of Effect:** The site represents a strikingly modern development within the Ilfracombe Conservation Area in a prominent cliff top location. Although the design has made some attempt to recess the three storey building into the edge of its proposed site, it would still be highly visible in the identified key view from Capstone towards the former Granville Hotel, as well as views from the upper floors of many of the Listed and non-designated assets within the Conservation Area; views between existing houses along Granville Road also being possible from some lower levels. It is located in an area of later Victorian and early 20<sup>th</sup> century development and lies forward of the current build line. The proposed modern design would therefore be likely to draw the eye in views across to the site. Indirect effects would be an increase in traffic with resultant audio-visual pollution, particularly larger vehicles during the construction phases.

**Significance of Effects:** Medium value asset and Minor Adverse Change = **Slight**

**Magnitude of Impact:** Minor Adverse



FIGURE 21: VIEW TOWARDS THE FORMER GRANVILLE HOTEL FROM ONE OF THE VIEWPOINTS ON CAPSTONE. THE POSITION OF THE PROPOSAL SITE IS INDICATED; VIEWED FROM THE EAST.

#### 4.3.4 HISTORIC LANDSCAPE

##### *General Landscape Character*

The landscape character of this area is coastal and Victorian seaside resort. The development represents an extension of the build line, which currently is formed to the south of Granville Road in this quite prominent area of the coast line. It also abuts the boundary of the North Devon Coast AONB whose primary purpose is 'to conserve and enhance natural beauty'. A number of the special qualities of the AONB make reference to the significance of the historic landscape character in this. The proposal would represent development on a previously undeveloped site and is likely to be visible in wider landscape views. Although against a backdrop of Victorian/early 20<sup>th</sup> century development the scale and design of the proposed building gives it the potential to have a greater impact on the general landscape character of this area than if vernacular materials or a lower impact design were adopted. It can therefore be considered to have a **minor adverse** impact on the general landscape character of the area.

#### 4.3.5 AGGREGATE IMPACT

The aggregate impact of a proposed development is an assessment of the overall effect of a single development on multiple heritage assets. This differs from cumulative impact (below), which is an assessment of multiple developments on a single heritage asset. Aggregate impact is particularly difficult to quantify, as the threshold of acceptability will vary according to the type, quality, number and location of heritage assets, and the individual impact assessments themselves.

Based on the restricted number of assets where any appreciable effect is likely, the aggregate impact of this development is **Neutral**.

#### 4.3.6 CUMULATIVE IMPACT

*Cumulative impacts affecting the setting of a heritage asset can derive from the combination of different environmental impacts (such as visual intrusion, noise, dust and vibration) arising from a*

*single development or from the overall effect of a series of discrete developments. In the latter case, the cumulative visual impact may be the result of different developments within a single view, the effect of developments seen when looking in different directions from a single viewpoint, of the sequential viewing of several developments when moving through the setting of one or more heritage assets.*

The Setting of Heritage Assets 2011a, 25

*The key for all cumulative impact assessments is to focus on the **likely significant** effects and in particular those likely to influence decision-making.*

GLVIA 2013, 123

An assessment of cumulative impact is, however, very difficult to gauge, as it must take into account existing, consented and proposed developments. The threshold of acceptability has not, however, been established, and landscape capacity would inevitably vary according to landscape character. There appears to have been limited recent development which has either taken place or has planning approval in this area, the main development being the conversion of the Granville Hotel to apartments. Whilst the proposal site sits in proximity to several existing residences constructed in a modern architectural style, these are set at a lower level and less prominent topographic location. The location of the proposed development in relation to heritage assets in the wider landscape and the topography of the site mean the cumulative impact of this development is therefore considered a **negligible adverse** magnitude of impact giving a Neutral/Slight adverse significance of effect.

TABLE 6: SUMMARY OF IMPACTS AND EFFECTS

Asset	Type	Distance	Value	Scale of Change	Significance of Effect	Magnitude of Impact
<b>Indirect Impacts</b>						
Chapel of St Nicholas with Lighthouse	GI	c.930m	High	Minor	Moderate/Slight	Moderate Adverse
Church of Holy Trinity and associated assets	G1	c.545m	High	Negligible	Slight	Minor Adverse
Church of St Philip and St James	GI*	c.585m	High	Minor	Moderate/Slight	Moderate Adverse
Hillsborough Promontory Fort	SAM	c.1.40km	High	Negligible	Slight	Negligible Adverse
Ilfracombe Conservation Area (including Listed Buildings)	CA	0m	Medium	Minor	Slight adverse	Minor Adverse
<b>Landscape Character</b>						
Historic Landscape	n/a	n/a		Minor	Slight Adverse	Minor Adverse
Aggregate Impact	n/a	n/a		No Change	Neutral	No Change
Cumulative Impact	n/a	n/a		Negligible	Neutral/Slight Adverse	Negligible Adverse

## 5.0 CONCLUSIONS

---

The site lies on a cliff top location to the north-west of the main settlement of Ilfracombe, north of Granville Road. Ilfracombe is an ancient sea port and market town built at the foot of a steep upward slope. It derives its name from a personal name 'Aelfred' and the old English element 'cumb' meaning coombe or valley. The parish of Ilfracombe is bordered by Berrynarbor, Bittadon, West Down and Mortehoe. Historically the parish lay within the Braunton Hundred and the ecclesiastical Deanery of Shirwell. The manor of Ilfracombe formed part of the barony of Barnstaple and passed through the Martin and Audley families to the Bouchiers. The population of the town increased fivefold from the time of the initial census in 1838 to 8557 in 1901, illustrating the rate at which the town grew during the 19<sup>th</sup> century.

The proposal site appears to have been part of a large pastoral field at the beginning of the 19<sup>th</sup> century. It was subdivided by the end of the 19<sup>th</sup> century and divided again by a new road at the beginning of the 20<sup>th</sup> century as the development of Ilfracombe as a Victorian seaside tourist destination pushed development further out from its historic linear core. The site falls into an area classified in the Devon Historic Landscape Characterisation as *Post Medieval Enclosures: Enclosures of post-medieval date. Fields laid out in the C18th and C19th commonly have many surveyed dead-straight field boundaries.*

Very little archaeological work has taken place in the vicinity of the site: a watching brief off Granville Road, to the south-west, revealed no archaeological features or finds (EDV4219), nor did a watching brief at the site of Brayfield Hotel (EDV4755). A watching brief at St Phillips and St James Church (EDV5347) revealed Post Medieval pottery, one of the few assemblages from Ilfracombe, demonstrative of the lack of archaeological fieldwork within the settlement rather than necessarily a lack of archaeological remains. As much of the development of Ilfracombe took place in the Victorian period it is likely any archaeological remains were not noted.

An inspection of the site identified a small number of earthwork features, including banks, terraces and platforms; and whilst none can at this stage be verified or dated, many of these features are likely to be recent in date (associated with episodes of landscaping), though the banks may be older.

Due to the density of development and the location of the site a 500m radius around the site has been considered. There are 68 Grade II listed buildings and one Conservation Area within 500m of the proposed development site. There are no World Heritage Sites, Scheduled Monuments or Registered Parks and Gardens within 500m of the site.

The overall impact of the proposed development can be assessed as **Slight Adverse**. Recommendations and proposed mitigation measures have been made as part of this assessment. The impact of the development on any buried archaeological resource would be **permanent** though the potential for encountering any archaeological features or deposits is unknown.

### 5.1.1 RECOMMENDATIONS AND MITIGATION

The proposal site is located within a Conservation Area and the design proposal appears to contrast with the design elements for this zone of the Conservation Area highlighted by the Ilfracombe Conservation Area appraisal. It is therefore recommended that should a dwelling in this location be deemed appropriate, the design and construction materials are reassessed to provide a building more in-keeping with the surrounding structures and which would enhance the Conservation Area.

## 6.0 BIBLIOGRAPHY & REFERENCES

---

### *Published Sources:*

- Chartered Institute of Field Archaeologists** 2014 revised 2017 and 2020: *Standard and Guidance for Historic Environment Desk-based Assessment*.
- Chartered Institute for Archaeologists** 2014b revised 2020: *Standard and Guidance for Archaeological Geophysical Survey*.
- English Heritage** 2008a: *Conservation Principles: policies and guidance for the sustainable management of the historic environment*.
- English Heritage** 2011: *Seeing History in the View*.
- Historic England** 2017: *Understanding Place: Historic area assessments in a planning and development context*.
- Historic England** 2017: *The Setting of Heritage Assets (2<sup>nd</sup> Edition)*
- Historic Scotland** 2016 updated 2020: *Managing Change in the Historic Environment: Setting*.
- 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.
- ICOMOS** 2005: *Xi'an Declaration on the Conservation of the Setting of Heritage Structures, Sites and Areas*.
- ICOMOS** 2011: *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties*. International Council on Monuments and Sites.
- Landscape Institute** 2013: *Guidelines for Landscape and Visual Impact Assessment*, 3<sup>rd</sup> edition. London.
- Lysons, D. & Lysons, S.** 1822: *Magna Britannia: volume 6*. London.
- Soil Survey of England and Wales** 1983: *Legend for the 1:250,000 Soil Map of England and Wales (a brief explanation of the constituent soil associations)*.
- UNESCO** 2015: *Operational Guidelines for the Implementation of the World Heritage Convention*.
- University of Newcastle** 2002: *Visual Assessment of Wind Farms: Best Practice*.
- Urban, S.** 1849: *The Gentlemans Magazine Vol XXXII July to December*. London: John Bowyer Nichols and Son

### *Websites:*

- British Geological Survey** 2022: *Geology of Britain Viewer*.  
[http://maps.bgs.ac.uk/geologyviewer\\_google/googleviewer.html](http://maps.bgs.ac.uk/geologyviewer_google/googleviewer.html)
- Cranfield Soil and Agrifield Institute** 2022: *Soilscapes*.  
<https://www.landis.org.uk/soilscapes/index.cfm?panel=search>
- Design Manual for Roads and Bridges (DMRB)** 2020 : LA 104 Environmental Assessment and Monitoring  
<https://www.standardsforhighways.co.uk/dmr/b/search/0f6e0b6a-d08e-4673-8691-cab564d4a60a>
- Environment Agency** 2022: *LiDAR, Digital Surface Model*.  
<https://environment.data.gov.uk/DefraDataDownload/?Mode=survey>
- Historic England** 2022: *Aerial Photo Explorer*.  
<https://Historicengland.org.uk/images-books/archive/collections/aerial-photos>
- University of Nottingham** 2022: *Key To English Place Names*  
<http://kepn.nottingham.ac.uk/map/place/Devon/Ilfracombe>

### *Unpublished Sources:*

- North Devon Coast AONB** 2019: *Management plan 2019-2024*
- North Devon Council** 2009: *Ilfracombe Conservation Area Character Appraisal*

APPENDIX 1: SUPPORTING PHOTOGRAPHS - WALKOVER SURVEY



1. VIEW ACROSS THE NORTH-WESTERN END OF THE PROPOSAL SITE SHOWING THE BOUNDARY WALL; VIEWED FROM THE EAST-SOUTH-EAST (NO SCALE).



2. VIEW ACROSS THE PROPOSAL SITE SHOWING THE RAISED PLATFORM AND SURROUNDING BANKED MATERIAL; VIEWED FROM THE SOUTH-EAST (NO SCALE).



3. VIEW ACROSS THE PROPOSAL SITE SHOWING THE BANK AND COLLAPSED CONCRETE POST FENCE LINE; VIEWED FROM THE SOUTH (NO SCALE).



4. VIEW ACROSS THE SOUTH-EASTERN END OF THE PROPOSAL SITE; VIEWED FROM THE EAST-SOUTH-EAST (NO SCALE).



5. VIEW ACROSS THE ILFRACOMBE CONSERVATION AREA FROM THE SOUTHERN EDGE OF THE PROPOSAL SITE; VIEWED FROM THE NORTH-WEST (NO SCALE).



6. VIEW FROM THE EASTERN EDGE OF THE PROPOSAL DEMONSTRATING CLEAR, OPEN VIEWS TOWARDS CAPSTONE (INDICATED RED), HILLSBOROUGH (BLUE) AND THE CHAPEL OF ST NICHOLAS (YELLOW); VIEWED FROM THE WEST (NO SCALE).



## 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 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

<sup>1</sup> [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).

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

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

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

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

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 (TABLE 9) and magnitude of the impact (TABLE 10) 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,

<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.

<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.

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 11 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 7: THE HIERARCHY OF VALUE/IMPORTANCE (BASED ON THE DMRB LA104 2020 TABLE 3.2N). TABLE 8 is taken from the current DMRB; TABLE 9 refers back to the 2011 DRMB which more usefully defines value in relation to designation.

TABLE 7: 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.

<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 8: 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 9: 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 10: 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 11: SCALES OF IMPACT AS PER THE NPPF, RELATED TO TABLE 10.

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.
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>.

<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> CIfA 2014 updated 2020: *Standard and guidance for historic environment desk-based assessment*.

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

<sup>18</sup> CIfA 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*.

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>:

6. Identify which heritage assets and their settings are affected.
7. Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.
8. Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it.
9. Explore ways to maximise enhancement and avoid or minimise harm.
10. 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.
- 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

<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.

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 12.

TABLE 12: 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 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*

<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.

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

*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.

---

<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.

Design value relates primarily to the aesthetic qualities generated by the conscious design of a building, structure,

<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*.

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.

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

## Concepts from World Heritage Guidance

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>

<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>.

century farmhouses are Listed while others are not, and differences may only reflect local government boundaries, policies and 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.*

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.*

<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.

<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.

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*

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.

<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*.

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 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.

---

<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.

APPENDIX 3: SUPPORTING PHOTOGRAPHS - IMPACT ASSESSMENT



1. THE CHAPEL OF ST NICHOLAS WITH LIGHTHOUSE; VIEWED FROM THE NORTH-NORTH-WEST (NO SCALE).



2. VIEW ACROSS THE ILFRACOMBE CONSERVATION AREA TOWARDS THE PROPOSAL SITE (INDICATED) FROM THE CHAPEL OF ST NICHOLAS; VIEWED FROM THE EAST-NORTH-EAST (NO SCALE).





3. CHURCH OF HOLY TRINITY; VIEWED FROM THE SOUTH (NO SCALE).



4. VIEW ACROSS THE ILFRACOMBE CONSERVATION AREA TOWARDS THE PROPOSAL SITE (INDICATED) FROM THE CHURCH OF HOLY TRINITY; VIEWED FROM THE SOUTH-SOUTH-WEST (NO SCALE).



5. THE CHURCH OF ST PHILIP AND ST JAMES; VIEWED FROM THE WEST (NO SCALE).



6. VIEW ACROSS THE ILFRACOMBE CONSERVATION AREA TOWARDS THE PROPOSAL SITE (INDICATED) FROM THE CHURCH OF ST PHILIP AND ST JAMES; VIEWED FROM THE EAST-SOUTH-EAST (NO SCALE).



7. HILLSBOROUGH PROMONTORY FORT; VIEWED FROM THE SOUTH-SOUTH-WEST (NO SCALE).



8. VIEW ACROSS THE ILFRACOMBE CONSERVATION AREA TOWARDS THE PROPOSAL SITE (INDICATED) FROM HILLSBOROUGH PROMONTORY FORT; VIEWED FROM THE EAST (NO SCALE).



9. MERLIN COURT; VIEWED FROM THE NORTH-NORTH-EAST (NO SCALE).



10. VIEW FROM MERLIN COURT ACROSS THE ILFRACOMBE CONSERVATION AREA; VIEWED FROM THE WEST (NO SCALE).



11. ROADSIDE VIEW FROM MERLIN COURT TOWARDS THE PROPOSAL SITE (INDICATED BEHIND ARBOREAL SCREENING); VIEWED FROM THE SOUTH-WEST (NO SCALE).



12. VIEW OF THE PROPOSAL SITE (INDICATED) FROM THE NORTHERN EDGE OF THE ILFRACOMBE CONSERVATION AREA (THE PROMENADE); VIEWED FROM THE EAST (NO SCALE).



13. VIEW ACROSS THE ILFRACOMBE CONSERVATION AREA TOWARDS THE PROPOSAL SITE (INDICATED) FROM THE QUEENS' HOTEL; VIEWED FROM THE SOUTH-EAST (NO SCALE).



14. EMANUEL CHURCH; VIEWED FROM THE NORTH-WEST (NO SCALE).



15. VIEW ACROSS THE ILFRACOMBE CONSERVATION AREA TOWARDS THE PROPOSAL SITE (INDICATED PARTIALLY SCREENED BY THE FORMER GRANVILLE HOTEL) FROM EMANUEL CHURCH; VIEWED FROM THE SOUTH-EAST (NO SCALE).



16. VIEW ACROSS THE NORTHERN EDGE OF THE ILFRACOMBE CONSERVATION AREA TOWARDS THE PROPOSAL SITE (INDICATED) FROM CAPSTONE; VIEWED FROM THE NORTH-EAST (NO SCALE).



17. VIEW FROM WITHIN THE ILFRACOMBE CONSERVATION AREA (BROOKDALE LODGE) TOWARDS THE PROPOSAL SITE (INDICATED); VIEWED FROM THE SOUTH-SOUTH-WEST (NO SCALE).



18. THE BATH HOUSE; VIEWED FROM THE SOUTH-SOUTH-EAST (NO SCALE).





19. VIEW ACROSS THE TUNNELS BEACHES ENTRANCE AND BATH HOUSE TOWARDS THE PROPOSAL SITE (INDICATED) DEMONSTRATING POSSIBLE PARTIAL SCREENING; VIEWED FROM THE SOUTH-SOUTH-WEST (NO SCALE).



20. VIEW TOWARDS THE PROPOSAL SITE (INDICATED BEHIND TOPOGRAPHIC SCREENING) FROM RUNNYMEADE HOUSE; VIEWED FROM THE SOUTH-SOUTH-WEST (NO SCALE).



21. VIEW ALONG WATERLOO TERRACE/FORE STREET WITHIN THE ILFRACOMBE CONSERVATION AREA DEMONSTRATING THE STREETSIDE PRIMARY FOCUS OF MANY OF THE TOWN'S LISTED BUILDINGS; VIEWED FROM THE EAST-NORTH-EAST (NO SCALE).



22. HIGH STREET VIEW OF THE ILFRACOMBE CONSERVATION AREA (THE WELLINGTON) DEMONSTRATING THE STREETSIDE PRIMARY FOCUS OF MANY OF THE TOWN'S LISTED BUILDINGS; VIEWED FROM THE SOUTH-SOUTH-WEST (NO SCALE).



23. VIEW ACROSS THE ILFRACOMBE CONSERVATION AREA TOWARDS THE PROPOSAL SITE (INDICATED) DEMONSTRATING THE POTENTIAL FOR VISIBILITY FROM SOME OF THE UPPER STOREYS; VIEWED FROM THE SOUTH-EAST (NO SCALE).



THE OLD DAIRY  
HACCHE LANE BUSINESS PARK  
PATHFIELDS BUSINESS PARK  
SOUTH MOLTON  
DEVON  
EX36 3LH

TEL: 01769 573555  
01872 223164  
EMAIL: [MAIL@SWARCH.NET](mailto:MAIL@SWARCH.NET)