SOUTH REGIS COMMON
CHALLACOMBE
EXMOOR
DEVON

Results of a Heritage Impact Assessment

South West Archaeology Ltd. report no. 191029

ARCHAEOLOGICAL SERVICES & HISTORIC BUILDING RECORDING
SOUTHWEST ARCHAEOLOGY

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South Regis Common, Challacombe, Exmoor, Devon

Results of a Heritage Impact Assessment

By E. Wapshott and N. Boyd
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Work undertaken by SWARCH for Exmoor National Park Authority

SUMMARY

This report presents the results of a heritage impact assessment carried out by South West Archaeology Ltd. (SWARCH) for South Regis Common, Challacombe, Exmoor, Devon in advance of the rewetting of the land in this area and the temporary reopening of a historic quarry.

The proposed works comprise the blocking of the hedgebank ditches along the N-S boundary, which were used to facilitate drainage and 'improve' the moorland; this will slow the water within the ditches. In addition, low bunds will be created, extending into the grass pasture for up to 10m to counter run-off and to retain water within the soil. There are two elements to the impact of the potential works, a) the period of the works themselves, which will be noisy and intrusive to the landscape and b) the change in the physical surroundings of the monuments. An additional element of the works comprises the temporary re-opening of the quarry, taking out a further c.200 cubic meters of stone. Access would be off the track and bridleway to the north and north-east, likely running up the boundary to the east of the field which the quarry abuts.

As such this assessment considers three barrows (one scheduled monument, one undesignated and a potentially newly discovered barrow) which stand in a stone-faced bank enclosed field on South Regis Common, above Challacombe, on the south-west fringe of Exmoor. The barrows stand on an even north-facing slope, with slight banding and ridging.

The quarry lies within the field, adjacent to the eastern boundary, in the lower north-east corner, next to a grubbed-out gateway. This quarry is directly related to the enclosure of this landscape in the post-medieval period, the stone likely used for the stone-faced field boundaries, although it appears that it may have originated as a mining inspection adit, given the presence of other similar 'quarries' nearby.

*For the barrows, the impact of the rewetting works once completed are considered to be either **Negligible** over time, with a **Negative/slight** impact during and after works before weathering softens the visuals. For the quarry works, there will be an inherent and material change to the visual landscape setting of the barrows, whilst slight and in time lessening there will be a **Negative/slight** impact**.** For the quarry itself there is direct effect which can be seen as **Negative/substantial** and irrevocable change. Over time this will lessen with weathering of the feature back into the landscape. Any harm could also be mitigated by detailed earwork survey, recording and interpretation of the quarry. There is a **Negative/slight** overall impact for the proposed works.*

October 2019

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ACKNOWLEDGMENTS

EXMOOR NATIONAL PARK AUTHORITY

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1.0 INTRODUCTION

LOCATION: SOUTH REGIS COMMON
PARISH: CHALLACOMBE
COUNTY: DEVON
NGR: CENTRED ON SS 71249 40466
SWARCH REF. CSRC19

1.1 PROJECT BACKGROUND

South West Archaeology Ltd. (SWARCH) was commissioned by Exmoor National Park Authority (ENPA; the Client) to undertake a heritage impact assessment for land at South Regis Common, Challacombe, Exmoor, Devon in advance of the proposed rewetting of this area as part of the Mires Project and in advance of the proposed reopening of an historic quarry on the site. This work was undertaken in accordance with best practice, CIfA guidelines and in consultation with ENPA.

1.2 TOPOGRAPHICAL AND GEOLOGICAL BACKGROUND

The proposed site lies approximately 2km to the east of Challacombe within the field enclosures on South Regis Common. The site lies at a height of approximately 423m (AOD), noticeably sloping to the north and west. The soils of this area are the loamy, permeable upland soils over rock with a wet peaty surface horizon and bleached subsurface horizon, often with thin ironpan of the Hafren Association (SSEW 1983); these overlie the sedimentary slate of the Kentisbury Slates Member in the northern half of the site and the Morte Slates Formation in the south (BGS 2019).

1.3 HISTORICAL BACKGROUND

The proposed site lies within the parish of Challacombe, in the hundred and deanery of Shirwell (Lysons 1822). The name is derived from the Saxon *Cealda Combe* or Cold Combe (challacombe.org.uk). Before the conquest the land was held by Ulmer. In Domesday it was recorded as *Celdecomba*, having also been recorded as *Celdecoma*, *Chaluecumba* (1168), *Chaudecumb* (1242) and *Chalvecombe* (15th century). By 1154, Challacombe was held by the Raleigh family. A marriage between the Raleighs and the Chichesters saw Challacombe pass to John Chichester in 1402 and the property remained in this family until being sold to Hugh Fortescue, Lord Clinton, in the 18th century. The landscape was transformed by inclosure during the 19th century, creating the fields which are the subject of this report; part of the wider period of Exmoor 'reclamation', as instigated by the influential Knight family on their estates. This can most closely be seen in the marked landscape differences between the Tithe Map (Figure 1), which denotes the site as 'common' land and 1880s 1st Edition OS mapping (Figure 2), where the regularised long straight hedgebank boundaries can be seen for the first time. It remained in the Fortescue family until the deaths of Earl and Lady Fortescue in 1958, when large death duties saw much of the Fortescue land, including the village, up for auction. The auction was won by a Crewkerne investment company, who only narrowly outbid the local tenant consortium. Three days later, however, Mr. R. Spieres bought the land in a private sale and sold it piecemeal to the local tenants, retaining two/three farms for himself.

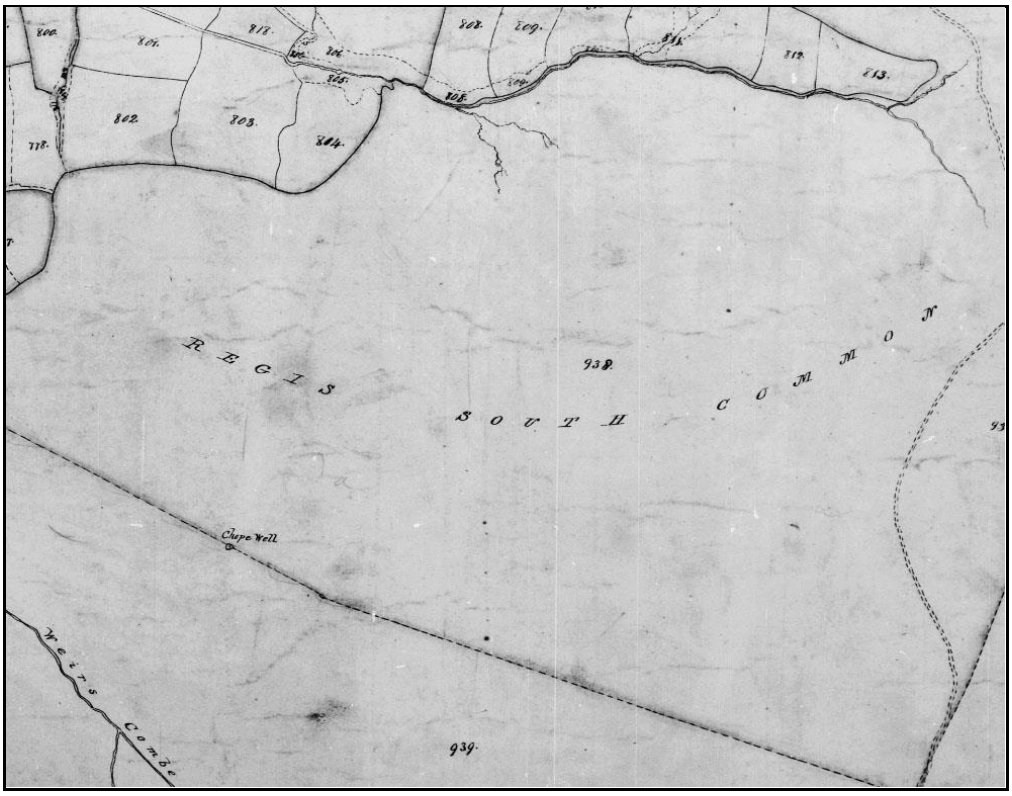

FIGURE 1: THE SOUTH REGIS COMMON TITHE MAP, 1840. SHOWING THE OPEN, UNENCLOSED MOORLAND.

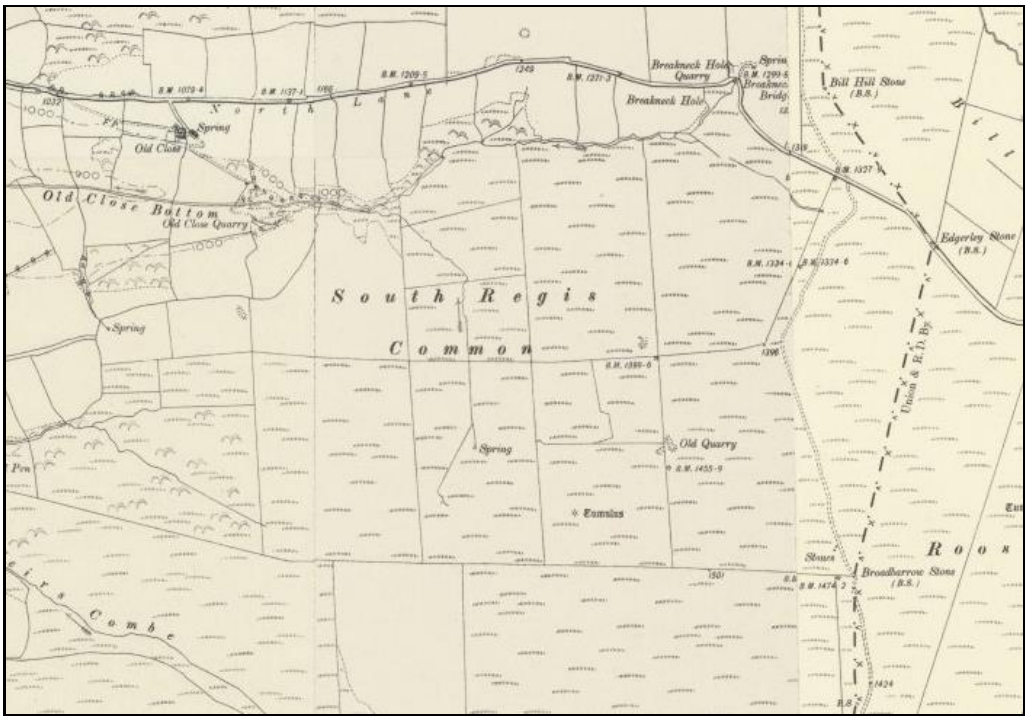

FIGURE 2: THE 1ST EDITION OS MAP, SHOWING THE INCLOSURE OF THE COMMON, FORMING INDIVIDUAL PLOTS.

1.4 ARCHAEOLOGICAL BACKGROUND

The Exmoor HER map records several features within the bounds of the proposed site. These include: MMO2183 A Bronze Age barrow or burial cairn, MMO2228 a post medieval drainage system, MEM22300 Bronze age round barrow, MMO2229 possible prehistoric ring cairn, MDE12841 possible ring ditches, MDE1284 Bronze Age barrow, MDE21801 post medieval quarry, MDE21219 undated quarry, MMO2230 undated quarry, MMO2188 clearance cairn, spoil heap and mounds, MMO2236

post medieval quarrying, field clearance or peat cutting, MMO2185 post medieval quarry, MMO2184 Bronze Age barrow or burial cairn, MMO2186 Bronze Age barrow or burial cairn (Figure 2).

1.5 METHODOLOGY

This work was undertaken in accordance with best practice. The heritage impact 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, revised 2017), Seeing History in the View (English Heritage 2011), Managing Change in the Historic Environment: Setting (Historic Scotland 2015), and with reference to Guidelines for Landscape and Visual Impact Assessment 3rd Edition (Landscape Institute 2013).

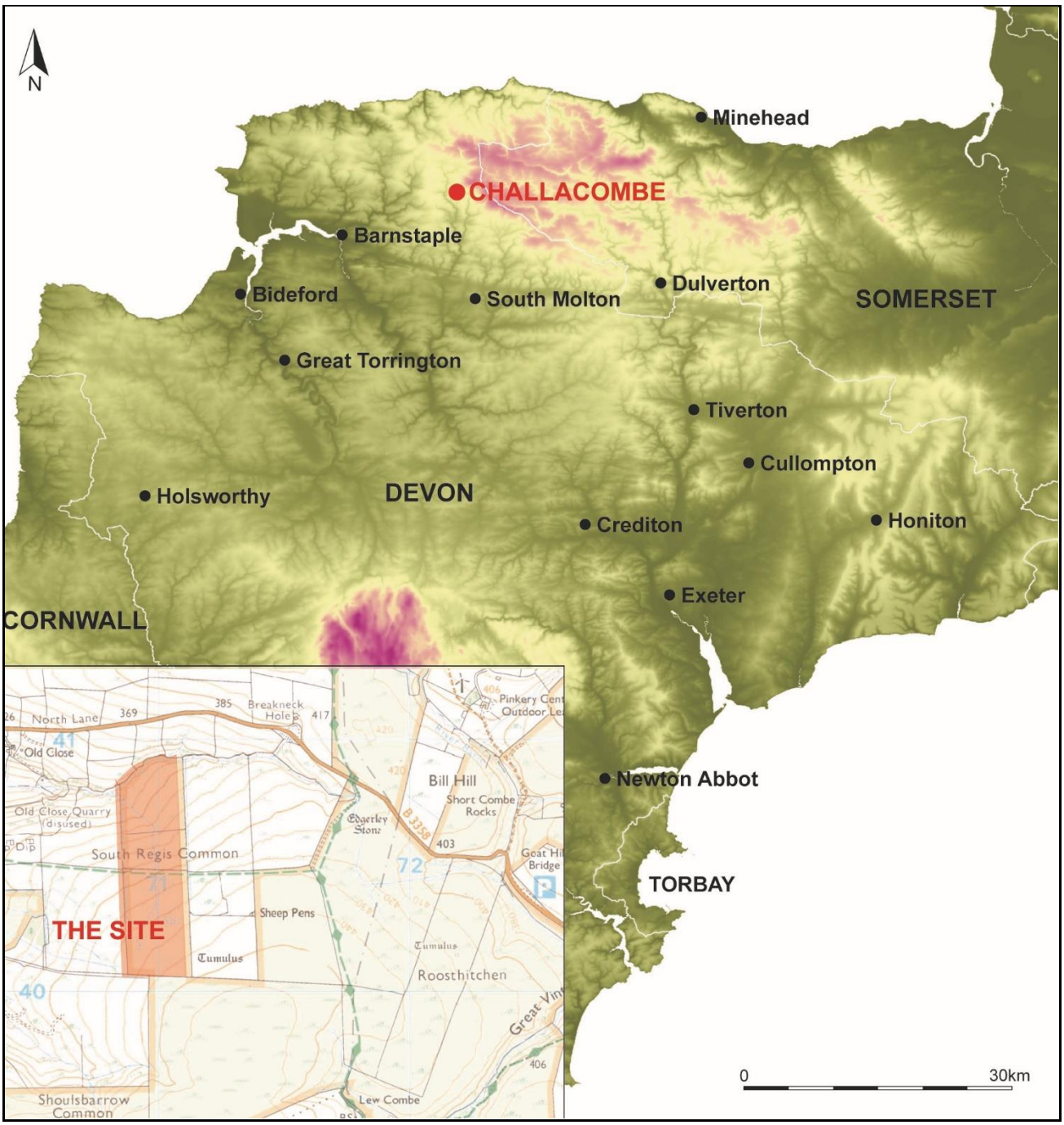

FIGURE 3: SITE LOCATION (THE SITE IS INDICATED).

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). This methodology employed in this assessment is based on the approach outlined in the relevant DoT guidance (DMRB vol.11; WEBTAG), used in conjunction with the ICOMOS (2011) guidance and the staged approach advocated in *The Setting of Heritage Assets* (GPA3 Historic England 2015). The methodology employed in this assessment can be found in Appendix 1.

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 2018). The relevant guidance is reproduced below:

Paragraph 189
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 190
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, 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.

2.3 LOCAL POLICY

Policy CE-S4 Cultural Heritage and Historic Environment in the *Exmoor National Park Local Plan 2011-2031* makes the following statement:

1. *Exmoor National Park's local distinctiveness, cultural heritage, and historic environment, will be conserved and enhanced to ensure that present and future generations can increase their knowledge, awareness and enjoyment of these special qualities.*
2. *Development proposals affecting heritage assets (identified on the Exmoor National Park Historic Environment Record) and their settings, will be considered in a manner appropriate to their significance including: a) designated conservation areas, scheduled monuments, listed buildings, and registered historic parks and gardens; and b) locally important historic sites and features, including Principal Archaeological Landscapes.*
3. *Development proposals should make a positive contribution to the local distinctiveness of the historic environment and ensure that the character, special interest, integrity, and significance of any affected heritage asset and its setting is conserved or enhanced.*
4. *Development proposals likely to affect heritage assets and/or the setting of heritage assets should be supported by a desk-based assessment appropriate to their significance. In certain cases, developers will be required to arrange for archaeological or historic building evaluations – these should be prepared in accordance with the Conduct of Archaeological Work and Historic Building Recording within Exmoor National Park (Annex 1).*
5. *Where development proposals will lead to substantial harm to, or total loss of significance of, a designated heritage asset, permission will be refused.*
6. *Adverse impacts on locally important heritage assets and/or their settings should be avoided. Where proposals are likely to cause substantial harm to or loss of locally important assets, permission will only be granted in exceptional circumstances where the public benefit outweighs the asset's historic or archaeological interest, having regard to the scale of any harm or loss and the significance of the heritage asset. The features of interest should be preserved in situ, but where this is not justifiable or feasible, provision must be made for appropriate preservation by record.*
7. *Development proposals should positively reinforce the historic character of Exmoor's settlements through reflecting the traditional vernacular architecture and enhancing local distinctiveness.*

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.

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 the archaeological potential of a site, and the significance of that archaeology, must be quantified by means of a staged programme of archaeological investigation. Appendix 1 details the methodology employed to make this judgement.

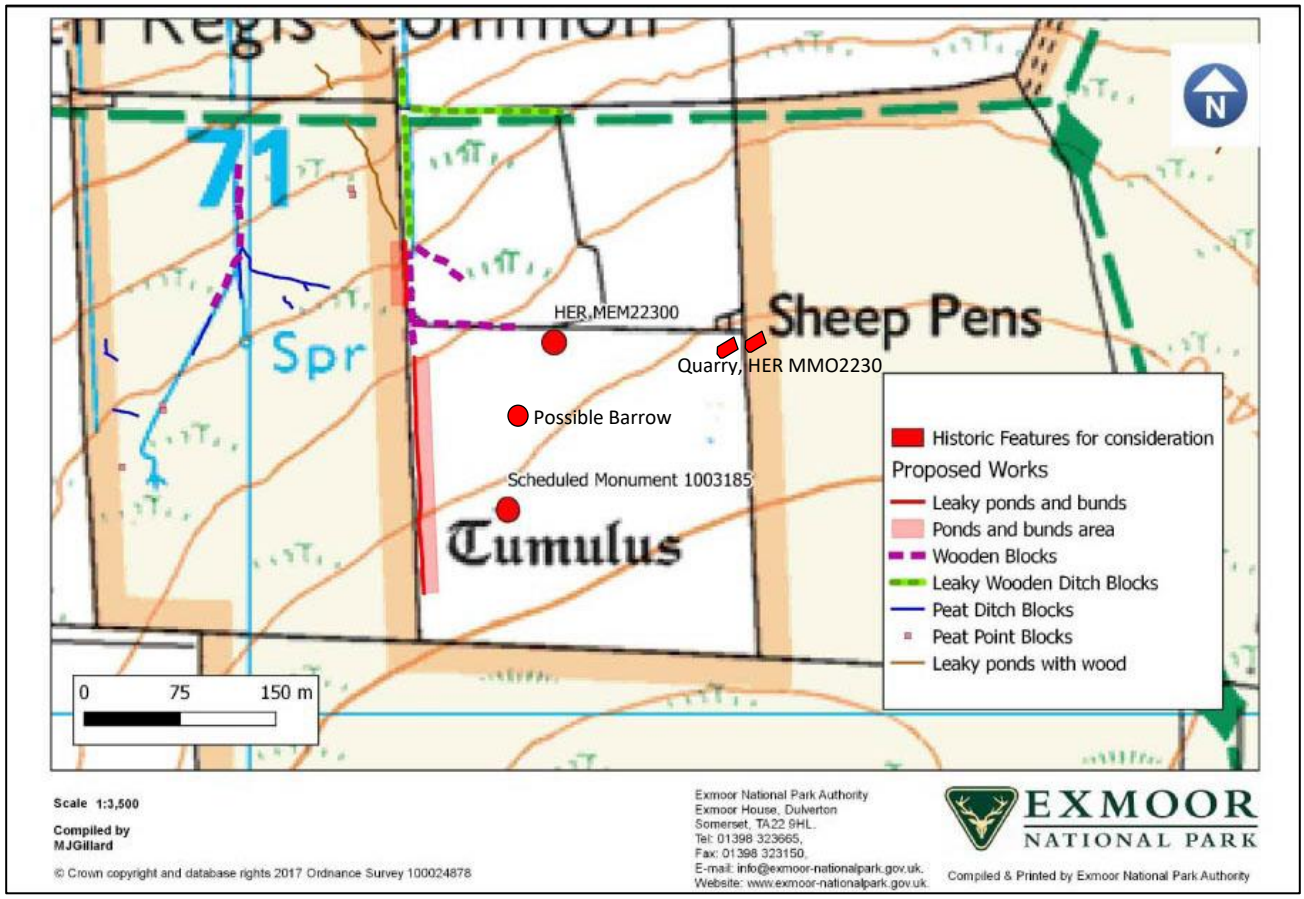

FIGURE 4: ENPA PROPOSED WORKS PLAN WITH HISTORIC FEATURES ANNOTATED (INCLUDING POSSIBLE NEW BARROW).

3.2 SITE DESCRIPTION

The barrows (one scheduled monument, one undesignated, and one newly discovered potential barrow: grid ref. SS 71183 40236) stand in a field, enclosed by pitched stone grassed banks on South Regis common, above Challacombe, on the south-west fringe of Exmoor. The field in which they are sited is of rough upland grass pasture and shows evidence of being used for haymaking and is currently used for autumn grazing of cattle. The barrows stand on an even north-facing slope, with slight ridging and natural geological terracing.

The undesignated barrow is abutted by a hedgebank which runs up and over it. This survives as a much larger, but less defined mound than the scheduled monument and the majority may be a natural outcrop although there is a defined ovoid mound on its south-east upper face and next to this a sub-circular, indicating it may have been previously excavated, or at least some human activity has occurred here. Both barrows survive as shallow grassed mounds and are very authentic as relict monuments within the landscape. The scheduled barrow, which sits out in the field, higher up the

slope on a slight natural terrace, is more worn down but smaller and of a more precise shape, it looks more complete. Between these is a third shallow but defined sub-ovoid mound, of similar proportions to the scheduled barrow, which is aligned lineally between the two, suggestive of another, undesignated burial. There are, however, other slight mounds in the landscape and ridges and geological banding. The slight mounds, further south, beyond the scheduled barrow are associated with other undulations and therefore may be geological. The field enclosure setting of these prehistoric features is a post-medieval cultural landscape overlay, associated with the 19th century reclaiming of Exmoor, via draining and the consequent 'improvement' of the ground from moorland to rough upland grass pasture. The current setting would be defined as working agricultural. The barrows were intended to stand out in an open unenclosed landscape, to be experienced with the other prehistoric sites across the landscape, including several other barrows which lie to the east. Barrows were both a burial and an important statement of settlement in the landscape for the society who raised it to their important community members and for its ongoing ability to commemorate ancestors in later times. As such, the earthen banks which enclose and divide the barrows from the rest of the landscape are wholly irrelevant to them and are negative to their significance. The barrows have a distinct and instantly recognisable prehistoric aesthetic, recognisable by the general public, and will have high evidential value despite excavation, as there may be secondary burials, sealed ground surfaces and paleo-environmental deposits, as well as evidence of each barrow's construction. They have no communal value or known historical value.

There is a historic extractive pit within the field, in the lower north-east corner, next to a grubbed-out gateway. This is marked on the 1st Edition OS mapping as an 'old quarry' but is not marked on the Tithe Map. It is noted on the Historic Environment Record that the 'quarry' in the field is associated with irregular pits to the east beyond the hedgebank, which clearly have an elongated spoil tip and the largest has a 'tail' which could be following a lode. There is another similar feature in the field to the north, beyond the track/footpath, also marked on the 1st Edition and broadly aligned, so again, possibly following the same mineral vein. The hedgebanks of the field in question seem to be punched through the area of disturbance, now dividing the pits; therefore, this is part of an earlier process of mineral extraction, or quarrying, which predates the enclosure of the fields for farming purposes. The 'quarry' within the subject site now visually appears very different to the shallower pit to the east, being deeper, its edges more ragged and may have been reopened and deepened to provide stone for the pitched stone hedgebanks, when the fields were established. If this is an earlier feature its context, is once again now irrelevant; as with the barrows. The field-scape a later cultural overlay. As a feature of inverted character however, for either potential former function, marking the removal of natural material, it has no real aesthetic, evidential or communal value and holds very little visual profile, even in the restricted area of the field, with only slight humped spoil-tip banks enclosing it, between it and the northern boundary. It is very authentic, as a relict extractive pit, of inverted character. It is in good condition, with moss and some grass encroachment but lots of exposed loose stone in its base.

3.3 LIDAR

The Impact Assessment survey works highlighted earthworks which have not been recorded on the HER and the significance of which will need to be understood and evaluated before works occur on the site. The LiDAR data for the location was therefore examined and does appear to confirm the potential of at least a third mound in a linear alignment with the scheduled and undesignated barrows. It also clarified the relationship between the extractive pits and associated soil tips with the hedgebanks of the field enclosures, which truncate them.

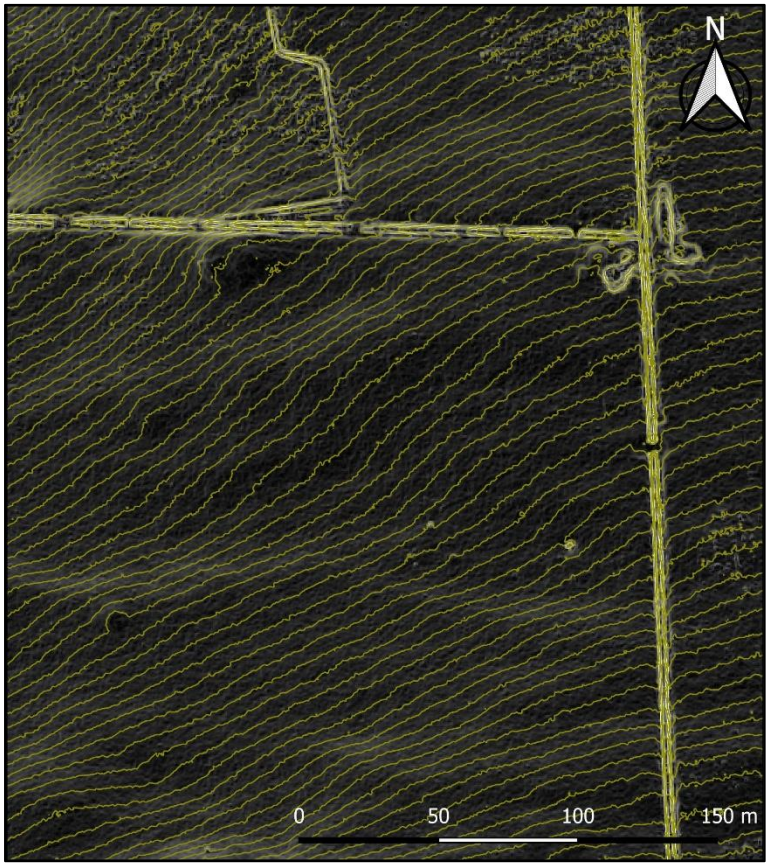

FIGURE 5: LIDAR, CHALLACOMBE, SOUTH REGIS COMMON, SLOPE WITH 50CM CONTOURS.

FIGURE 6: LIDAR,CHALLACOMBE, SOUTH REGIS COMMON. SLOPE IMAGE.

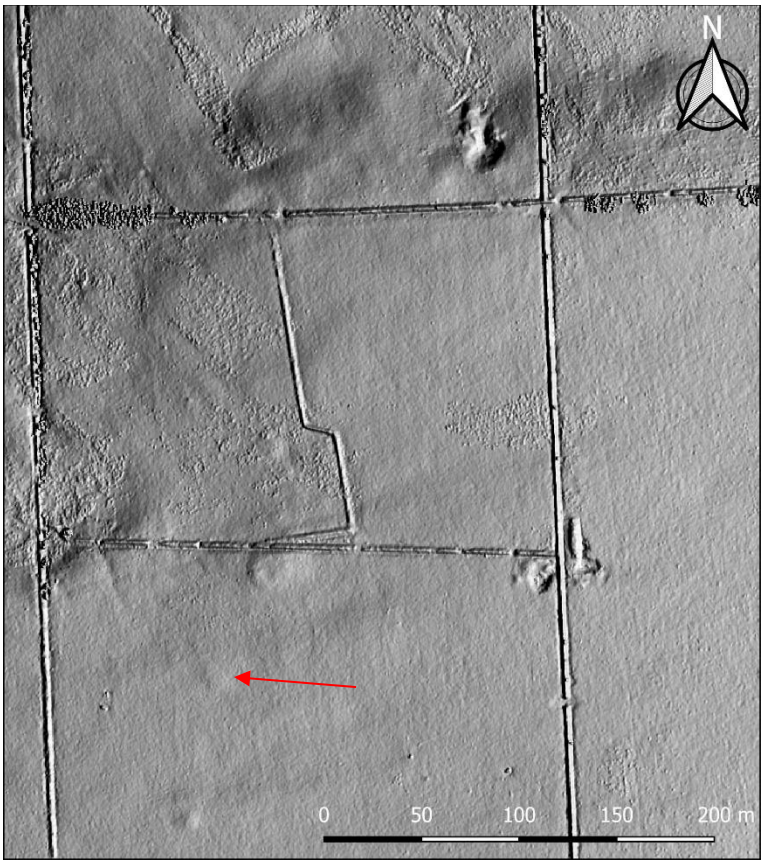

FIGURE 7: LIDAR, CHALLACOMBE, HILLSHADE 90. THE NEWLY IDENTIFIED POTENTIAL BARROW IS INDICATED.

3.4 THE REWETTING WORKS

The works comprise insertion of wooden blocks into the drainage ditches alongside the hedges; of these many are intended to 'leak', others are more solid. The aim of this is to slow the water being carried away, rather than to wholly infill and flood the ditches (See Appendix 3 for plans). The bunds, of low height 0.5m will project at intervals out into the fields 5-7m apart, up to 10m long, and will again retain water behind them and within the sub-soils, reducing run-off effects. The works in the immediate environment of the assets lies to the west, along the bank and are a mixture of 'leaky ponds and bunds' and a wider area of ponds and bunds, as well as wooden blocks along the north-west corner of the field. The ponds and bunds will affect the wider physical setting of the more ephemeral scheduled barrow, the wooden blocks will infill the ditch along the bank which runs up and over the undesignated barrow, immediately to the west. There are two elements to the impact of the potential works, a) the period of the works themselves, which will be noisy and intrusive to the landscape and b) the change in the physical surroundings of the monuments.

The works will bring noise and disturbance to the general setting for a temporary period, while works are ongoing; this cannot be avoided. Whilst there will be no direct or lasting impact, this will affect the experiential value of the assets for visitors. The works will avoid direct intervention on the monuments themselves, there will however, be a visual scarring of the field-scape with exposed soil, before the bunds 'weather in' to the setting, by acquiring a grass sward. The regular man-made linear pattern of these will draw the eye in wider views until then and therefore are very likely to subsume any slight visual profile of the shallow burial mounds. There are, however, other slight mounds in the landscape and ridges and geological terracing, so overall it is unlikely that additional undulation will have a wider visual effect, once grassed over, as the barrows are not visible from the road, let alone on a landscape level. In the immediate setting however, this will be significantly more obvious within

the field, as the area to be affected will lie beyond the barrows on the slope and so frame all views from the adjacent track/footpath; the slight raised skyline profile of the barrows on the curve of the slope, will effectively be erased by the bunds behind. This affects their aesthetic value and the experience of visitors.

Conversely by restoring the boggier 'mire', the works will unintentionally restore the landscape setting of these barrows to the unenclosed moorland in which they were constructed. It is hoped that the rewetting will encourage the heather and moorland species and cut back the dominance of the Molinia grasses, the pale thatch of which subsumes features in the landscape across Exmoor. By inducing the 'natural' species to flourish there could over time therefore be an indirect visual and experiential benefit for the assets. This may be undermined however by the eventual abandonment and wholescale re-wilding of the fields, if the wetter ground no longer fulfils the requirements of the farmer. With the reduction of active agricultural management, long-term issues such as scrub management may need to be considered to ensure the monuments condition does not deteriorate.
There is also the slight risk of waterlogging the burials and therefore impacting the survival of any secondary burials or other deposits; particularly in relation to the scheduled and middle unacknowledged barrow, which are in closest proximity to the 'ponds and bunds' area of works. The ongoing active management of this rewetting process is expected to mitigate this as the monuments will be assessed for condition during and after works.

High Value Assets with a Slight Inherent Change = For the barrows the rewetting works are considered to be **Negative/slight** for a period during works and for a brief time after before weathering. Overall it is expected the impact will ultimately be **Negligible**. If re-wetting in fact restores the ecological setting of the barrows back to a more traditional 'moorland' appearance, there may even be an argument for a **Slight/Beneficial** 'positive' impact.

3.5 REOPENING THE QUARRY

The works comprise the temporary re-opening of the extractive pit, taking out c.200 cubic meters of stone. Access would be off the track and bridleway to the north and north-east, likely running up the boundary to the east of the field which the quarry abuts.

The issue for the scheduled barrow and undesignated barrows would be if the quarry's size was significantly increased by this removal; with the associated loss of its shape and historic profile. It will also start to become more obvious within the field and wider landscape, the removal of stone will be a temporary fresh scar on the landscape. Visually, far afield this will be more visible than the barrows and any re-wetting bunds, even once weathered a significantly larger hole in the landscape will cause shadowing, as well as further spoilt tips, which will make it more visible. This obviously has more of an effect on the barrows, which were always intended to be memorial features, their visual profile vital to their raison d'etre. Losing their visual profile is very negative for these assets and will affect their significance. This will encroach on the setting of the barrows within the field, particularly of the undesignated barrow which is closest. There is a cumulative impact on the barrows of re-opening the quarry if their setting is being encroached upon from east and west.

The fields and quarry are ultimately irrelevant to the significance of the barrows; the landscape character in their immediate setting not relating to them. If the stone removal and the visual impact of this on the landscape is routinely monitored, then works could continue with a rolling assessment ensuring a sustainable source of local stone can be achieved whilst minimising risks to other assets. Its re-opening and reuse will bring noise and disturbance to the general setting while works are ongoing; this cannot be avoided but is temporary. In time, the quarry will grass over again and the setting will revert in character. Fundamentally, the meaning of the landscape and setting will not change, despite technically the damage of the undesignated historic asset (the extractive pit itself), in its current condition. As an asset, the quarry itself will be utterly transformed and irrevocably so. If

this is excavated further as a quarry but is in fact associated with mineral extraction, then by quarrying here the understanding and interpretation of this asset will be changed and its relationships with the pits to the east will be affected.

High Value Assets with a Negative Potential Change to Visuals of Setting = There will be an inherent and material change to the visual landscape setting of the barrows. Whilst slight and in time lessening there will be a **Negative/slight Impact.**

For the quarry itself: an assessment of N**egative/substantial impact**, on current state. Long term **Negligible** effect on its understanding, interpretation etc.

3.6 MITIGATION

It may be necessary to undertake a full ground survey of the 'quarry' within the field and other extractive pits over the hedgebank to the east, in order to make a full record of the activity here and to ensure the narrative of the 'quarry' is correctly represented in record before it is may be transformed by re-opening. This is especially relevant if a later phase of quarrying has altered an earlier adit.

In addition, it may be necessary to undertake more detailed fieldwork survey within the field to ensure any potential other slight barrow mounds are fully recorded before works occur. The linear arrangement of the potential three barrows within the field and another mound being visible, although unconfirmed in the rough enclosure to the north (again possibly aligned) would suggest the archaeological potential of this landscape has been underappreciated.

4.0 CONCLUSION

The barrows (one scheduled monument, one undesignated and one potential unrecorded barrow) stand in an enclosed field on South Regis Common, above Challacombe, on the south-west fringe of Exmoor. The field in which they are sited is of rough upland grass pasture and shows evidence of being used for haymaking and is currently used for autumn grazing of cattle. The barrows stand on an even north-facing slope, with slight banding and ridging. The extraction pit lies within the same field, in the lower north-east corner, next to a grubbed-out gateway. This quarry is directly related to the enclosure of this landscape in the post-medieval period, the stone likely used for the stone-faced field boundaries but may predate the fields, having first been associated with mining, an exploratory adit.

The works comprise the blocking of the hedgebank ditches along the N-S boundary, which were used to facilitate drainage and 'improve' the moorland; this will slow the water within the ditches. In addition, low bunds will be created, extending into the grass pasture for up to 10m to counter run-off and to retain water within the soil. There are two elements to the impact of the potential works, a) the period of the works themselves, which will be noisy and intrusive to the landscape and b) the change in the physical surroundings of the monuments. An additional element of the works comprises the temporary re-opening of the extraction pit, taking out a further c.200 cubic meters of stone. Access would be off the track and bridleway to the north and north-east, likely running up the boundary to the east of the field which the quarry abuts.

For the barrows, the impact of the re-wetting works once completed will be **Negligible** over time, with a **Negative/slight** impact during and after works before weathering softens the visuals. For the quarry works, there will be an inherent and material change to the visual landscape setting of the barrows, whilst slight, and in time lessening, there will be a **Negative/slight** impact**.** For the quarry itself there is direct effect which is **Negative/substantial** and irrevocable change. Over time this level of impact may be considered to lessen due to the weathering of the feature back into the landscape, where it becomes a relict natural resource exploitation feature. Any harm to the quarry could be mitigated by a full interpretive earthwork survey, and as such there would be a **Negative/slight** overall impact.

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Design Manual for Roads and Bridges (DMRB) 2016: Volume 11, Cultural Heritage
http://www.standardsforhighways.co.uk/DMRB/vol11/index.htm

WEBTAG 2016: Transport Analysis Guidance, Cultural Heritage
https://www.gov.uk/guidance/transport-analysis-guidance-webtag

APPENDIX 1: IMPACT ASSESSMENT METHODOLOGY

Heritage Impact Assessment - Overview

The purpose of heritage impact assessment is twofold: Firstly, to understand – insofar as is reasonable 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 its setting (indirect impact). This methodology employed in this assessment is based on the staged approach advocated in *The Setting of Heritage Assets* (GPA3 Historic England 2015), used in conjunction with the ICOMOS (2011) and DoT (DMRB vol.11; WEBTAG) guidance. This Appendix contains details of the 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 2018). The relevant guidance is reproduced below:

Paragraph 189

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 190

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, 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.

Cultural Value – 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.

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 19th 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 19th 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 20th 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. There are 19,000-20,000 Scheduled Monuments in England.

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** and there are currently 1,600 sites on the list, 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.

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 1: 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.

Concepts – Conservation Principles

In making an assessment, this document adopts the conservation values (*evidential*, *historical*, *aesthetic* and *communal*) laid out in *Conservation Principles* (English Heritage 2008), and the concepts of *authenticity* and *integrity*

as laid out in the guidance on assessing World Heritage Sites (ICOMOS 2011). This is in order to determine the relative importance of *setting* to the significance of a given heritage asset.

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. This is the least equivocal value: evidential value is absolute; all other ascribed values (see below) are subjective. However,

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 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 have their most pronounced impact: the indirect effects of most developments are predominantly visual or aural, and can extent 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.

Authenticity
Authenticity, as defined by UNESCO (2015, no.80), 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 farmbuildings, for instance, survive in good condition, but are drained of the authenticity of a working farm environment.

Integrity
Integrity, as defined by UNESCO (2015, no.88), is the measure of wholeness or intactness of the cultural heritage ad 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.

Summary
As indicated, individual developments have a minimal or tangential effect on most of the heritage values outlined above, largely because almost all effects are indirect. The principle values in contention are aesthetic/designed and, to a lesser degree aesthetic/fortuitous. There are also clear implications for other value elements (particularly historical and associational, communal and spiritual), where views or sensory experience is important. As ever, however, the key element here is not the intrinsic value of the heritage asset, nor the impact on setting, but the relative contribution of setting to the value of the asset.

Setting – The Setting of Heritage Assets
The principle guidance on this topic is contained within two publications: *The Setting of Heritage Assets* (Historic England 2015) and *Seeing History in the View* (English Heritage 2011). While interlinked and complementary, it is useful to consider heritage assets in terms of their *setting* i.e. their immediate landscape context and the environment within which they are seen and experienced, and their *views* i.e. designed or fortuitous vistas experienced by the visitor when at the heritage asset itself, or those that include the heritage asset. This corresponds to the experience of its wider landscape setting.

Where the impact of a proposed development is largely indirect, *setting* is the primary consideration of any HIA. It is a somewhat nebulous and subjective assessment of what does, should, could or did constitute the lived experience of a monument or structure. The following extracts are from the Historic England publication *The Setting of Heritage Assets* (2015, 2 & 4):

The NPPF makes it clear that the setting of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve.

Setting is not a heritage asset, nor a heritage designation. Its importance lies in what it contributes to the significance of the heritage asset. This depends on a wide range of physical elements within, as well as perceptual and associational attributes, pertaining to the heritage asset's surroundings.

While setting can be mapped in the context of an individual application or proposal, it does not have a fixed boundary and 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 because what comprises a heritage asset's setting may change as the asset and its surroundings evolve or as the asset becomes better understood or due to the varying impacts of different proposals.

The HIA below sets out to determine the magnitude of the effect and the sensitivity of the heritage asset to that effect. The fundamental issue is that proximity and visual and/or aural relationships may affect the experience of a

heritage asset, but if setting is tangential to the significance of that monument or structure, then the impact assessment will reflect this. This is explored in more detail below.

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 determine the character and extent of the setting.

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

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

Views

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*, see below). The following extract is from the English Heritage publication *Seeing History in the View* (2011, 3):

Views play an important part in shaping our appreciation and understanding of England's historic environment, whether in towns or cities or in the countryside. Some of those views were deliberately designed to be seen as a unity. Much more commonly, a significant view is a historical composite, the cumulative result of a long process of development.

The Setting of Heritage Assets (2015, 3) lists a number of instances where views contribute to the particular significance of a heritage asset:

- Views where relationships between the asset and other historic assets or places or natural features are particularly relevant;
- Views with historical associations, including viewing points and the topography of battlefields;
- Views where the composition within the view was a fundamental aspect of the design or function of the heritage asset;
- Views between heritage assets and natural or topographic features, or phenomena such as solar and lunar events;
- Views between heritage assets which were intended to be seen from one another for aesthetic, functional, ceremonial or religious reasons, such as military or defensive sites, telegraphs or beacons, Prehistoric funerary and ceremonial sites.

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. 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. 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.

Yet 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 (see Table 2), 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. The schema used to guide assessments is shown in Table 2 (below).

Type and Scale of Impact

The effect of a proposed development on a heritage asset can be direct (i.e. the designated structure itself is being modified or demolished, the archaeological monument will be built over), or indirect (e.g. a housing estate built in the fields next to a Listed farmhouse, and wind turbine erected near a hillfort etc.); in the latter instance the principal effect is on the setting of the heritage asset. A distinction can be made between construction and operational phase effects. Individual developments can affect multiple heritage assets (aggregate impact), and contribute to overall change within the historic environment (cumulative impact).

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 provision of screening. Large development would have an effect on historic landscape character, as they transform areas from one character type (e.g. agricultural farmland) into another (e.g. suburban).

Cumulative Impact: a single development will have a physical and a 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. The cumulative impact of a proposed development is particularly difficult to estimate, given the assessment must take into consideration operational, consented and proposals in planning.

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.

Scale of Impact

The effect of development and associated infrastructure on the historic environment can include positive as well as negative outcomes. However, all development changes the character of a local environment, and alters the character of a building, or the setting within which it is experienced. change is invariably viewed as negative, particularly within respect to larger developments; thus while there can be beneficial outcomes (e.g. positive/moderate), there is a presumption here that, as large and inescapably modern intrusive visual actors in the historic landscape, the impact of a development will almost always be **neutral** (i.e. no impact) or **negative** i.e. it will have a **detrimental impact** on the setting of ancient monuments and protected historic buildings.

This assessment incorporates the systematic approach outlined in the ICOMOS and DoT guidance (see Tables 6-8), used to complement and support the more narrative but subjective approach advocated by Historic England (see Table 5). This provides 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 negative/substantial is almost never achieved). This is in adherence with GPA3 (2015, 7).

TABLE 2: MAGNITUDE OF IMPACT (BASED ON DMRB VOL.11 TABLES 5.3, 6.3 AND 7.3).

Factors in the Assessment of Magnitude of Impact – Buildings and Archaeology	
Major	Change to key historic building elements, such that the resource is totally altered; Change to most or all key archaeological materials, so that the resource is totally altered; Comprehensive changes to the setting.
Moderate	Change to many key historic building elements, the resource is significantly modified; Changes to many key archaeological materials, so that the resource is clearly modified; Changes to the setting of an historic building or asset, such that it is significantly modified.
Minor	Change to key historic building elements, such that the asset is slightly different; Changes to key archaeological materials, such that the asset is slightly altered; Change to setting of an historic building, such that it is noticeably changed.
Negligible	Slight changes to elements of a heritage asset or setting that hardly affects it.
No Change	No change to fabric or setting.
Factors in the Assessment of Magnitude of Impact – Historic Landscapes	
Major	Change to most or all key historic landscape elements, parcels or components; extreme visual effects; gross change of noise or change to sound quality; fundamental changes to use or access; resulting in total change to historic landscape character unit.
Moderate	Changes to many key historic landscape elements or components, visual change to many key aspects of the historic landscape, noticeable differences in noise quality, considerable changes to use or access; resulting in moderate changes to historic landscape character.
Minor	Changes to few key historic landscape elements, or components, slight visual changes to few key aspects of historic landscape, limited changes to noise levels or sound quality; slight changes to use or access: resulting in minor changes to historic landscape character.
Negligible	Very minor changes to key historic landscape elements, parcels or components, virtually unchanged visual effects, very slight changes in noise levels or sound quality; very slight changes to use or access; resulting in a very small change to historic landscape character.
No Change	No change to elements, parcels or components; no visual or audible changes; no changes arising from in amenity or community factors.

TABLE 3: SIGNIFICANCE OF EFFECTS MATRIX (BASED ON DRMB VOL.11 TABLES 5.4, 6.4 AND 7.4; ICOMOS 2011, 9-10).

Value of Assets	Magnitude of Impact (positive or negative)				
	No Change	Negligible	Minor	Moderate	Major
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 4: SCALE OF IMPACT.

Scale of Impact	
Neutral	No impact on the heritage asset.
Negligible	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.
Negative/minor	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.
Negative/moderate	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.
Negative/substantial	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.

TABLE 5: IMPORTANCE OF SETTING TO INTRINSIC SIGNIFICANCE.

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

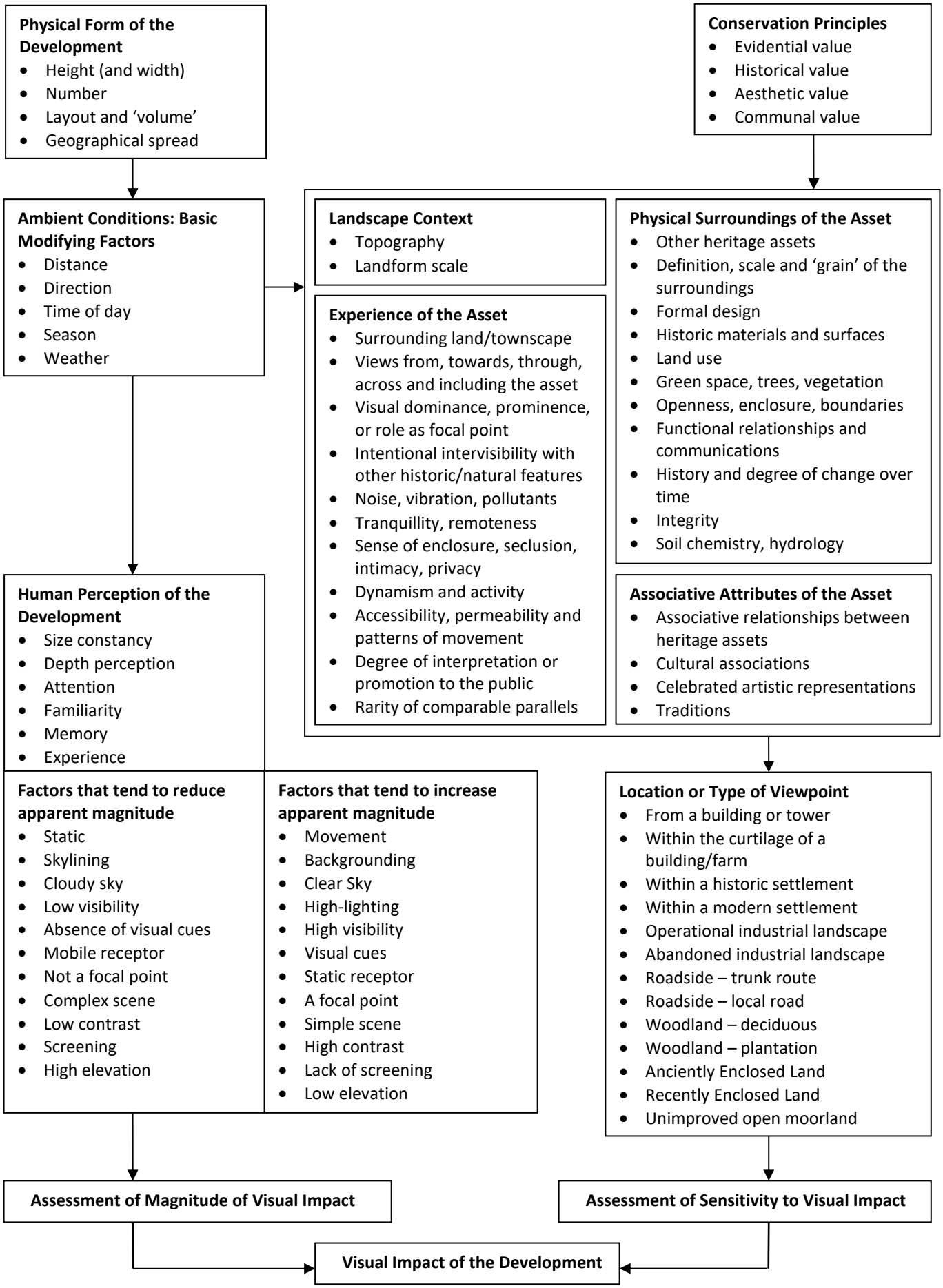


TABLE 6: THE CONCEPTUAL MODEL FOR VISUAL IMPACT ASSESSMENT PROPOSED BY THE UNIVERSITY OF NEWCASTLE (2002, 63), MODIFIED TO INCLUDE ELEMENTS OF *ASSESSMENT STEP 2* FROM THE SETTING OF HERITAGE ASSETS (HISTORIC ENGLAND 2015, 9).

APPENDIX 2: PHOTOGRAPHIC ARCHIVE

1. THE SITE AS VIEWED FROM THE ROAD; FROM THE NORTH-NORTH-EAST.

2. VIEW ALONG THE DISTINCTIVE MATURE TREE LINED BOUNDARY TO THE SOUTH AND EAST OF THE ASSETS, THE REMINDER OF THE LAYING OUT OF THIS LANDSCAPE IN THE 19TH CENTURY; FROM THE WEST-SOUTH-WEST.

3. VIEW OF THE EASTERN BOUNDARY OF THE FIELD IN WHICH THE ASSETS ARE ENCLOSED, SHOWING GRASSED STONE-FACED BANK, WITH SECONDARY FENCING; FROM THE NORTH-EAST.

4. VIEW ALONG THE SOUTHERN BOUNDARY; FROM THE EAST.

5. VIEW OF THE INTERMEDIATE LOW BANK BETWEEN THE TWO MAIN FIELDS, SHOWING IT RISING UP AND OVER THE SHALLOW BARROW MOUND ON THE SKYLINE; FROM THE NORTH-EAST.

6. IN DETAIL, THE UNDESIGNATED BARROW; FROM THE NORTH-EAST.

7. THE BARROW AND THE LOW GRASS BANK, FROM THE EAST-SOUTH-EAST.

8. IN DETAIL, THE BARROW AND 2M SCALE; FROM THE EAST.

9. VIEW UP THE INNER SIDE OF THE EASTERN BOUNDARY, SHOWING SOME SCREENING FROM THE BANKS, WHICH ARE QUITE HIGH, DESPITE THE LOSS OF THE HEDGES THEY ONCE WOULD HAVE SUPPORTED; FROM THE NORTH-WEST.

10. VIEW OF THE HEDGEBANK TO THE SOUTH AND THE QUARRY IN THE CORNER OF THE FIELD, SHOWING THEIR PROXIMITY, AS WELL AS THE WIDE VIEWS TO THE NORTH TO THE MOORLAND; FROM THE SOUTH.

11. THE QUARRY IN DETAIL, WITH 2M SCALE; FROM THE WEST.

12. VIEW UP AND ACROSS THE FIELD SYSTEM, SHOWING THE LOW BANKS ENCLOSING THE OTHER FIELDS; FROM THE NORTH-EAST.

13. VIEW SHOWING THE OPEN NATURE OF THE SITE AND VAST MOORLAND LANDSCAPE VIEWS; FROM THE SOUTH-WEST.

14. VIEW SHOWING THE OPEN NATURE OF THE SITE AND VAST MOORLAND LANDSCAPE VIEWS; FROM THE SOUTH-SOUTH-WEST.

15. VIEW SHOWING THE OPEN NATURE OF THE SITE AND VAST MOORLAND LANDSCAPE VIEWS; FROM THE SOUTH.

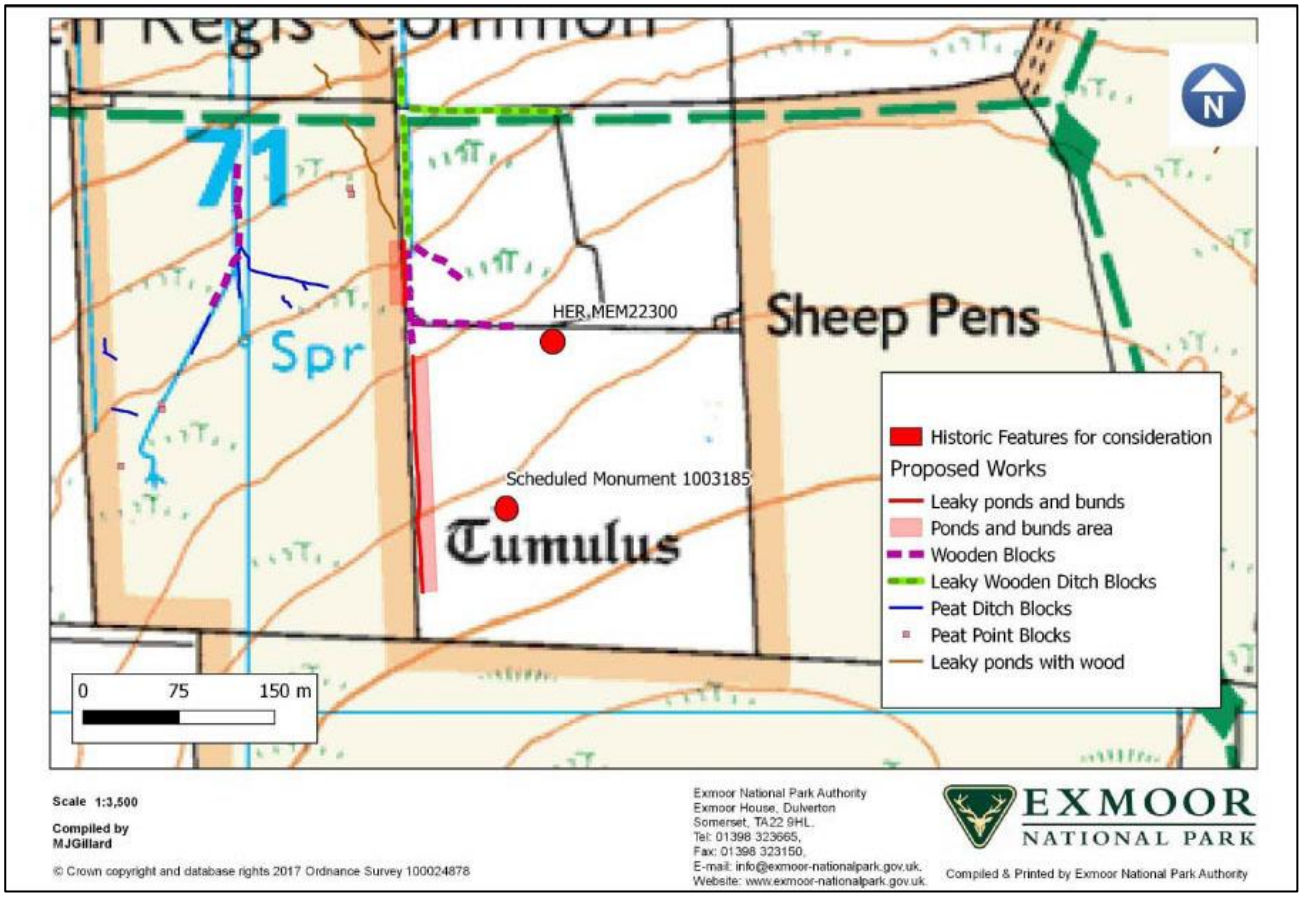
16. VIEW SHOWING THE OPEN NATURE OF THE SITE AND VAST MOORLAND LANDSCAPE VIEWS; FROM THE SOUTH-EAST.

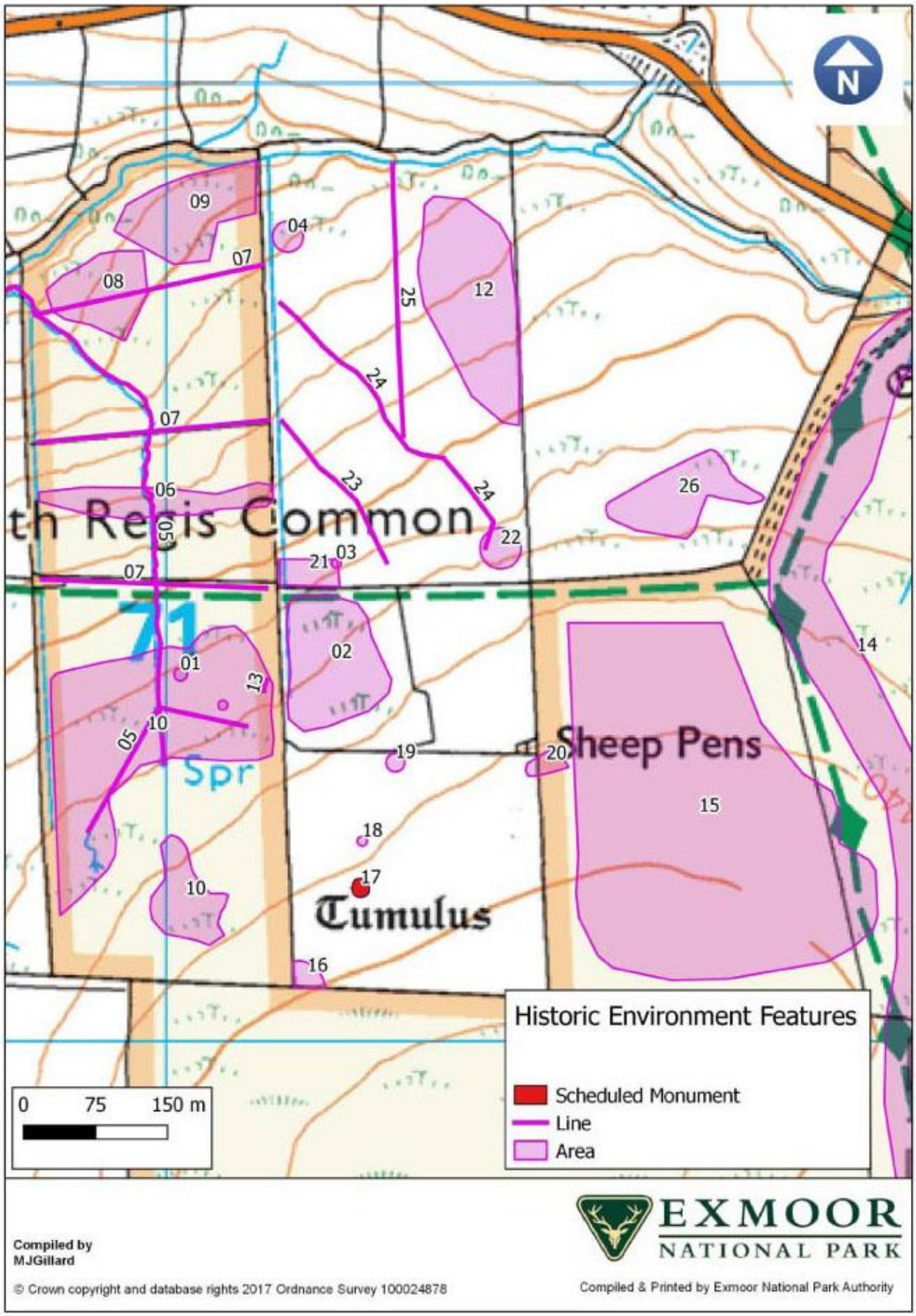
17. VIEW SHOWING THE OPEN NATURE OF THE SITE AND VAST MOORLAND LANDSCAPE VIEWS; FROM THE EAST-SOUTH-EAST.

18. THE MUCH LOWER, SCHEDULED BARROW, SET WITHIN THE FIELD; FROM THE EAST-NORTH-EAST.

19. THE SCHEDULED BARROW IN DETAIL; FROM THE NORTH-EAST.

APPENDIX 3: ENPA PROPOSALS

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