

CARFRAE
ST. ANNS CHAPEL
GUNNISLAKE
CORNWALL

RESULTS OF A HERITAGE IMPACT ASSESSMENT



South West Archaeology Ltd. report no. 211018



www.swarch.net

Tel. 01769 573555

Tel. 01872 223164

Carfrae, St. Anns Chapel, Gunnislake, Cornwall

Results of a Heritage Impact Assessment

By N. Boyd
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Work undertaken by SWARCH for a Private Client

SUMMARY

This report presents the results of a Heritage Impact Assessment carried out by South West Archaeology Ltd. (SWARCH) for the renovation and extension of Carfrae, St. Anns Chapel, Gunnislake, Cornwall.

The proposed site lies within the Tamar Valley World Heritage Site (WHS). The site lies to the west of St. Anns Chapel, immediately south of the A390. To the west of the site lies the Tamar Valley Caravan Park; to the north of the road lie a garage and two new residential properties; to the east and south lie agricultural land and open countryside. The proposed site lies within the Tamar Valley area of the Cornwall and West Devon Mining Landscape World Heritage Site (A10).

Keeping the proposed extension as a single storey structure within existing mature garden boundaries will reduce visibility, and will be within keeping with the existing structure and surrounding landscape. Other modern impacts are located to the north and west and are in closer proximity to the Prehistoric Assets of Hingston Down and the Prince of Wales Mine at Harrowbarrow.

*With this in mind, the overall impact of the proposed development can be assessed as **negligible**. The impact of the development on the buried archaeological resource would be **permanent/irreversible** but is thought to be of low potential.*



October 2021

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CONTENTS

<i>SUMMARY</i>	2
<i>CONTENTS</i>	3
<i>LIST OF FIGURES</i>	3
<i>LIST OF TABLES</i>	3
<i>LIST OF APPENDICES</i>	4
<i>ACKNOWLEDGEMENTS</i>	4
<i>PROJECT CREDITS</i>	4
1.0 INTRODUCTION	5
1.1 PROJECT BACKGROUND	5
1.2 SITE LOCATION	5
1.3 HISTORICAL AND ARCHAEOLOGICAL BACKGROUND	5
1.4 METHODOLOGY	6
2.0 HERITAGE IMPACT ASSESSMENT	7
2.1 HERITAGE IMPACT ASSESSMENT - OVERVIEW	7
2.2 NATIONAL POLICY	7
2.3 LOCAL POLICY	8
2.4 DIRECT AND INDIRECT IMPACTS	9
3.0 DIRECT IMPACTS	10
3.1 INTRODUCTION	10
3.2 ARCHAEOLOGICAL POTENTIAL	10
3.2.1 Setting	10
3.2.2 Consideration of the Proposals	10
3.2.3 Archaeological Potential	11
4.0 INDIRECT IMPACTS	12
4.1 INTRODUCTION	12
4.2 QUANTIFICATION	12
4.3 CORNWALL & WEST DEVON MINING WHS	13
4.3.1 Cornwall and West Devon Mining Landscape WHS	13
4.3.2 Aggregate Impact	13
4.3.3 Cumulative Impact	13
5.0 CONCLUSION	14
6.0 BIBLIOGRAPHY & REFERENCES	15

LIST OF FIGURES

COVER PLATE: CARFRAE; PHOTOGRAPHED BY THE CLIENT.

FIGURE 1: THE PROPOSED SITE LOCATION INDICATED IN RED; LAND REGISTRY.	6
FIGURE 2: PROPOSED SITE IMAGES, SHOWING THE MATURE PLANTING; FROM THE CLIENT.	10
FIGURE 3: EXTRACT OF THE FIRST EDITION OS MAP OF 1883; NLS.	11

LIST OF TABLES

TABLE 1: THE HIERARCHY OF VALUE/IMPORTANCE.	18
TABLE 2: MAGNITUDE OF IMPACT.	23
TABLE 3: SIGNIFICANCE OF EFFECTS MATRIX.	23
TABLE 4: SCALE OF IMPACT.	23
TABLE 5: IMPORTANCE OF SETTING TO INTRINSIC SIGNIFICANCE.	24
TABLE 6: THE CONCEPTUAL MODEL FOR VISUAL IMPACT ASSESSMENT.	25

LIST OF APPENDICES

APPENDIX 1: IMPACT ASSESSMENT METHODOLOGY

16

ACKNOWLEDGEMENTS

THE CLIENT

THE STAFF OF KRESNEN KERNOW

PROJECT CREDITS

PROJECT DIRECTOR: DR. SAMUEL WALLS, MCIFA

REPORT: NATALIE BOYD

EDITING: DR. SAMUEL WALLS, MCIFA

1.0 INTRODUCTION

LOCATION:	CARFRAE
PARISH:	ST. ANNS CHAPEL
COUNTY:	CORNWALL
CENTROID NGR:	SX 40435 70912
PLANNING REF:	PRE-APPLICATION
SWARCH REF:	SACC21
OASIS REF:	SOUTHWES1-506426

1.1 PROJECT BACKGROUND

South West Archaeology Ltd. was commissioned by a Private Client (the Client) to produce an impact assessment for the construction of an extension to Carfrae, St. Anns Chapel, Gunnislake, Cornwall. This work was undertaken in accordance with best practice and CIfA guidelines and pre-application advice, ahead of a planning application.

1.2 SITE LOCATION

The site lies to the west of St. Anns Chapel, immediately south of the A390. To the west of the site lies the Tamar Valley Caravan Park; to the north of the road lie a garage and two new residential properties; to the east and south lie agricultural land and open countryside. The house lies on a level plateau, at a height of c.214m AOD, with the south-facing garden then dropping away quite rapidly.

1.3 HISTORICAL AND ARCHAEOLOGICAL BACKGROUND

The site lies within the Tamar Valley Mining District with Tavistock of the Cornwall and West Devon Mining World Heritage Site (A10). The area is described as comprising both valley and upland settings for tin, copper, silver-lead and arsenic mining, ore processing and smelting¹²³. The area includes the River Tamar with its industrial river quays and Tavistock, which was remodelled with the profits of copper mining in the mid-19th century. The site lies within a landscape that indicates prehistory activity⁴.

Approximately 300m to the south-west of the site lies the Prince of Wales Mine at Harrowbarrow, part of this site is designated as a Scheduled Monument (SM No.1021411; DCO1121). A similar distance to the north of the site is Hingston Down, including an early Medieval field system (MCO39227), a number of Prehistoric assets, including Bronze Age Barrows (MCO2882, MCO2884, MCO2885, MCO2886, MCO50288, MCO40297) and Post Medieval firing range (MCO50289) and brickworks (MCO29416). The OS first and second edition maps indicate the disused West Drakewells Copper Mine c. 500m to the east, lost beneath modern developments at The Beeches.

No archaeological fieldwork has been undertaken on the site or in its immediate surrounds and there is nothing recorded on the HER.

¹ Cornish Mining 2005: *Cornwall and West Devon Mining Landscape: World Heritage Site Management Plan 2005-10*.

² DCMS 2005: *Nomination of the Cornwall and West Devon Mining Landscape for inclusion on the World Heritage List*.

³ Sharpe, A. 2014: *Cornwall and West Devon Mining Landscape World Heritage Site; Condition Survey 2014*.

⁴ Colin Buck 1998: *Preliminary Assessment of Industrial Sites of Archaeological Importance in the Tamar Valley*; Cornwall County Council.

1.4 METHODOLOGY

This archaeological assessment 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), 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 ClfA, IHBC and IEMA in July 2021.



FIGURE 1: THE PROPOSED SITE LOCATION INDICATED IN RED; LAND REGISTRY.

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 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.

2.3 LOCAL POLICY

Policy 24: *Cornwall Local Plan: Strategic Policies 2010-2030:*

Policy 24: Historic environment

Development proposals will be permitted where they would sustain the cultural distinctiveness and significance of Cornwall's historic rural, urban and coastal environment by protecting, conserving and where appropriate enhancing the significance of designated and non-designated assets and their settings.

Development proposals will be expected to:

- sustain designated heritage assets;
- take opportunities to better reveal their significance;
- maintain the special character and appearance of Conservation Areas, especially those positive elements in any Conservation Area Appraisal;
- conserve and, where appropriate, enhance the design, character, appearance and historic significance of historic parks and gardens;
- conserve and, where appropriate, enhance other historic landscapes and townscapes, including registered battlefields, including the industrial mining heritage;
- protect the historic maritime environment, including the significant ports, harbours and quays.

Development within the Cornwall and West Devon Mining Landscape World Heritage Site (WHS) and its setting should accord with the WHS Management Plan. Proposals that would result in harm to the authenticity and integrity of the Outstanding Universal Value, should be wholly exceptional. If the impact of the proposal is neutral, either on the significance or setting, then opportunities to enhance or better reveal their significance should be taken.

All development proposals should be informed by proportionate historic environment assessments and evaluations (such as heritage impact assessments, desk-based appraisals, field evaluation and historic building reports) identifying the significance of all heritage assets that would be affected by the proposals and the nature and degree of any effects and demonstrating how, in order of preference, any harm will be avoided, minimised or mitigated.

Great weight will be given to the conservation of the Cornwall's heritage assets. Where development is proposed that would lead to substantial harm to assets of the highest significance, including undesignated archaeology of national importance, this will only be justified in wholly exceptional circumstances, and substantial harm to all other nationally designated assets will only be justified in exceptional circumstances.

Any harm to the significance of a designated or non-designated heritage asset must be justified. Proposals causing harm will be weighed against the substantial public, not private, benefits of the proposal and whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset.

In those exceptional circumstances where harm to any heritage assets can be fully justified, and development would result in the partial or total loss of the asset and/or its setting, the applicant will be required to secure a programme of recording and analysis of that asset, and archaeological excavation where relevant, and ensure the publication of that record to an appropriate standard in a public archive.

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 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 INTRODUCTION

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.

3.2 ARCHAEOLOGICAL POTENTIAL

3.2.1 Setting

The site sits to the west of the settlement of St. Ann's Chapel and to the north-east of the settlement of Harrowbarrow, immediately to the south of the A390. The proposed site lies within a rectangular field enclosure. The setting of the site is largely of working rural (agricultural) character, with residential development immediately to the north, and a caravan park to the immediate west of the access lane to the property. The site is made up of a bungalow at the northern end, a lawned garden, and a mature tree and shrub boundary.

3.2.2 Consideration of the Proposals

The proposal is for the construction of a single storey extension to the south side of the house in order to maximise the views from the property while increasing the living space.

Although the site lies within the World Heritage Site, it does not sit in close proximity to any upstanding mining buildings or features. The property is single storey, and the plot is bounded by mature trees and shrubs. Views to the property from the south would be limited and, while the large glass panes may draw the eye if seen beyond the screening of the mature planting, two large, new residential preproperties immediately north of the A390 would create a similar, if not bigger draw. Additionally, there is a relatively large caravan park immediately to the west of the site which would also distract the eye from the proposed extension. It does not appear that there would be any views to the extension from the north, east, or west, but any that are possible from the east and west would be heavily screened by the mature planted site boundaries.



FIGURE 2: PROPOSED SITE IMAGES, SHOWING THE MATURE PLANTING; FROM THE CLIENT.

The tithe map of c.1840 shows the area as fields, with very few recognisable landmarks in comparison with the post-mining landscape in which a number of settlements, buildings, roads and railways were installed along with the mines and mining features. There do not appear to be any structures on the site at this time. The First Edition Ordnance Survey Map of 1883 shows the site as part of the larger field in which it sits (Figure 3). There is no indication of any buildings or structures. Very few changes have occurred by the time of production of the Second Edition OS Map of 1906, the field in which the site now sits devoid of any structures or divisions.



FIGURE 3: EXTRACT OF THE FIRST EDITION OS MAP OF 1883; NLS (THE APPROXIMATE SITE IS INDICATED).

3.2.3 Archaeological Potential

The archaeological impact of the proposed extension is largely unproven, but considered to have low potential based on the records shown on the Cornwall HER and historic maps. The area appears to be of post-medieval or later enclosure. It is not thought that archaeological investigation work is necessary.

4.0 INDIRECT IMPACTS

4.1 INTRODUCTION

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 – and principally its visual effect – can impact on designated assets up to 20km away.

The methodology adopted in this document is based on that outlined in *The Setting of Heritage Assets* (GPA3 Historic England 2015), with reference to ICOMOS (2011) and DoT (DMRB, WEBTAG) guidance. The assessment of effect at this stage of a development is an essentially subjective one, but one based on the experience and professional judgement of the authors. Appendix 1 details the methodology employed.

This report follows the staged approach to proportionate decision making outlined in *The Setting of Heritage Assets* (Historic England 2015, 6). *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. The second stage in the process is to look at the heritage assets within the search radius and assign 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 still listed in the impact summary table.

For *Step two* and *Step three*, and with an emphasis on practicality and proportionality (*Setting of Heritage Assets* p15 and p18), this assessment then groups and initially discusses heritage assets by category (e.g. churches, historic settlements, funerary remains etc.) to avoid repetitious narrative; each site is then discussed individually, and the particulars of each site teased out. The initial discussion establishes the baseline sensitivity of a given category of monument or building to the potential effect, the individual entry elaborates on local circumstance and site-specific factors. The individual assessments should be read in conjunction with the overall discussion, as the impact assessment is a reflection of both.

4.2 QUANTIFICATION

The size and low profile of the proposed building extension, as well as the local topography and screening, would indicate that a search radius of approximately 250m is sufficient for this study.

There is only one designated heritage asset which has been deemed to require detailed consideration, The Tamar Valley area of the Cornwall and West Devon Mining World Heritage Site (A10).

4.3 CORNWALL & WEST DEVON MINING WHS

4.3.1 Cornwall and West Devon Mining Landscape WHS

The proposed development would lie within the Cornwall and West Devon Mining Landscape World Heritage Site (Tamar Valley & Tavistock). There is an inherent conflict between the protection and preservation of this landscape, and the duty to 'protect, conserve and enhance historical authenticity, integrity and historic character' and the need to appreciate this is a living landscape that continues to evolve and where sustainable development must be encouraged (see the *WHS Management Plan 2005-10*). The upland parts of this landscape form a highly distinctive landform, in which the relicts of its mining heritage form prominent components. Anything that detracts from that comes into conflict with the need to conserve and enhance historic character. While an increase in housing developments within the World Heritage Site could erode the distinctive character of the landscape, the proposed development is an extension of an existing bungalow, in an established and mature bounded garden. Any views to the extension would be very limited and heavily screened by the boundaries of the garden. In addition, the scale of the extension is very small compared to the residential development to the immediate north of the site, and the extension of the caravan park to the immediate west. The impact of this development on the WHS is therefore considered to be **negligible**.

4.3.2 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**.

4.3.3 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. The visual impact of the extension on the wider landscape is individually fairly negligible, but it will have a **neutral to negative/minor cumulative impact**, furthering the modernisation and development seen in this area of formerly open countryside to the west of St. Ann's Chapel.

5.0 CONCLUSION

The site lies to the west of St. Anns Chapel, immediately south of the A390. To the west of the site lies the Tamar Valley Caravan Park; to the north of the road lie a garage and two new residential properties; to the east and south lie agricultural land and open countryside. The proposed site lies within the Tamar Valley area of the Cornwall and West Devon Mining Landscape World Heritage Site (A10).

Keeping the proposed extension as a single storey structure within existing mature garden boundaries will reduce visibility, and is in keeping with the existing structure and surrounding landscape. Other modern impacts are located to the north and west and are in closer proximity to the Prehistoric Assets of Hingston Down and the Prince of Wales Mine at Harrowbarrow.

With this in mind, the overall impact of the proposed development can be assessed as **negligible**. The impact of the development on the buried archaeological resource would be **permanent/irreversible** but is thought to be of low potential.

6.0 BIBLIOGRAPHY & REFERENCES

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<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. 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. 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 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.

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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.

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;

Hierarchy of Value/Importance	
	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.

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 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.

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 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.

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 8), 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 4-6), used to complement and support the more narrative but subjective approach advocated by Historic England (see Table 7). 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

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<i>Neutral</i>	No impact on the heritage asset.
<i>Negligible</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>Negative/minor</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>Negative/moderate</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.
<i>Negative/substantial</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.

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

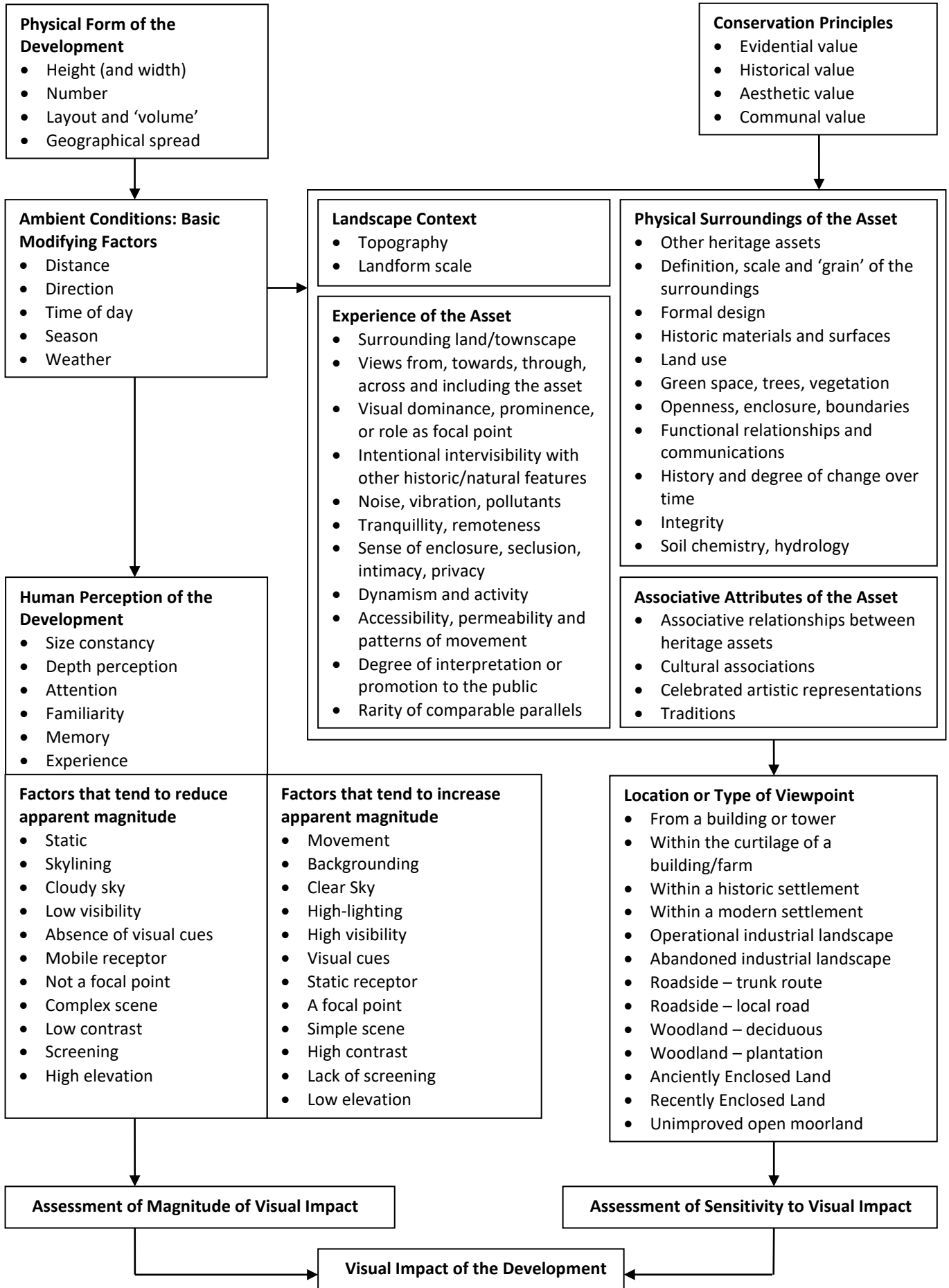


TABLE 6: THE CONCEPTUAL MODEL FOR VISUAL IMPACT ASSESSMENT PROPOSED BY THE UNIVERSITY OF NEWCASTLE (2002, 63), MODIFIED TO INCLUDE ELEMENTS OF ASSESSMENT STEP 2 FROM THE SETTING OF HERITAGE ASSETS (HISTORIC ENGLAND 2015, 9).



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

TEL: 01769 573555
Tel. 01872 223164
EMAIL: MAIL@SWARCH.NET