

**PRIORY LODGE
MOUNT WISE
NEWQUAY
CORNWALL**

Results of a Heritage Impact Assessment



South West Archaeology Ltd. report no. 220805



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Priory Lodge, Mount Wise, Newquay, Cornwall

Results of a Heritage Impact Assessment

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Report Version: FINAL

Issued: 5th August 2022

Finalised: 24th April 2023

Work undertaken by SWARCH for a Private Client (the Client)

SUMMARY

This report presents the results of a heritage impact assessment carried out by South West Archaeology Ltd. (SWARCH) for a proposed residential redevelopment of Priory Lodge, Mount Wise, Newquay, Cornwall.

The site lies with the 'modern' town of Newquay a relatively large settlement, which originated as a coastal hamlet in the medieval period known as Towan Blystra, a 'New Quay' was first recorded in 1429, but the settlement only rapidly expanded in the later 19th century, initially in association with mining and fishing and industries and then after a brief lull as a railway resort destination, with fashionable Edwardian terrace housing expanding the town.

The site lies off Mount Wise, a Major route through the town and it is south-west of the Parish Church of St. Michael in the centre of Newquay. The Grade II Listed church of St. Michael was constructed here following the creation of the parish of Newquay from part of St. Columb Minor in 1882. Although there had been a chapel-of-ease in the settlement, it was felt the new Parish warranted its own church, and St. Michael's was built between 1909 and 1911 in a Cornish Perpendicular style by Ninian Comper. A church hall, built in an Arts and Crafts style was constructed to the immediate north at a similar time. The Site - Priory Lodge was built as a vicarage for the New Church in 1923, becoming a Hotel in 1979, and was substantially extended in the 1980s.*

The proposed development would see the demolition of all buildings currently on the site and replacement with a four storey, 19 unit apartment building. Due to truncation of the site, direct impacts are likely to be limited. Priory Lodge is considered to be a building which adds value to the narrative of this area of Newquay and makes a significant contribution to the significance of the Grade II Listed church through its setting. The indirect impacts on nearby designated heritage assets, namely the Grade II* Listed St Michael's Church are considered moderate adverse. There is a potential constructional phase impact on the closest heritage assets in terms of aural and visual intrusion, though this impact will only be temporary.*

*With this in mind, the overall impact of the proposed development can be assessed as **Moderate Adverse**. Recommendations and proposed mitigation measures have been made as part of this assessment. The impact of the development on any buried archaeological resource may be **permanent** and **irreversible** but is considered unlikely to encounter any archaeological features or deposits.*



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ACKNOWLEDGEMENTS

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1.0 INTRODUCTION

LOCATION:	PRIORY LODGE, MOUNT WISE
PARISH:	NEWQUAY
COUNTY:	CORNWALL
CENTROID NGR:	SW 81085 61463
PLANNING NO.	PRE-PLANNING
SWARCH REF.	NPL22
OASIS REF.	SOUTHWES1-508448

1.1 PROJECT BACKGROUND

South West Archaeology Ltd. (SWARCH) was commissioned to undertake a heritage impact assessment for a proposed residential redevelopment of Priory Lodge, Mount Wise, Newquay. This work was undertaken in accordance with best practice and ClfA guidelines.

1.2 TOPOGRAPHY

The proposed site is located in the centre of Newquay, with the parish church of St. Michael and two leisure sites to the north, with guest houses and residential properties to the east and south. The site lies at c.46m AOD. The soils are classified as Urban (SSEW 1983), and the underlying bedrock of the site is the mudstone, siltstone and sandstone of the Bovisand Formation (BGS 2022).

1.3 HISTORICAL & ARCHAEOLOGICAL BACKGROUND

The town of Newquay originated as a coastal hamlet in the medieval period and was known as *Towan Blystra* (CSUS 2003). In 1439 the 'New Quay' was first recorded and the economy of the settlement was primarily related to fishing and small-scale maritime trade from here into the post-medieval period. A new harbour and a tramway linking Newquay to the mining and china clay industries were added in the 19th century, which catalysed the growth of the town. The collapse of the mining and pilchard fishing industries towards the end of the 19th century saw Newquay in decline, however, it emerged as a railway resort, resulting in new wealth and a demand for housing which saw the development of large Edwardian terraced suburbs to house the fashionable visitors it was attracting.

The site lies along Mount Wise, immediately east of the park and south-west of the Parish Church of St. Michael in the centre of Newquay. The Cornwall Historic Landscape Characterisation (HLC) records the site as lying within an area of *Settlement: older core (pre-1907): settled areas from larger farming settlements upwards*.

The parish church of St. Michael was constructed here following the creation of the parish of Newquay from part of St. Columb Minor in 1882. Although there had been a chapel-of-ease in the settlement, it was felt the new Parish warranted its own church, and St. Michael's was built between 1909 and 1911 in Cornish Perpendicular style by Ninian Comper. It is Grade II* Listed.

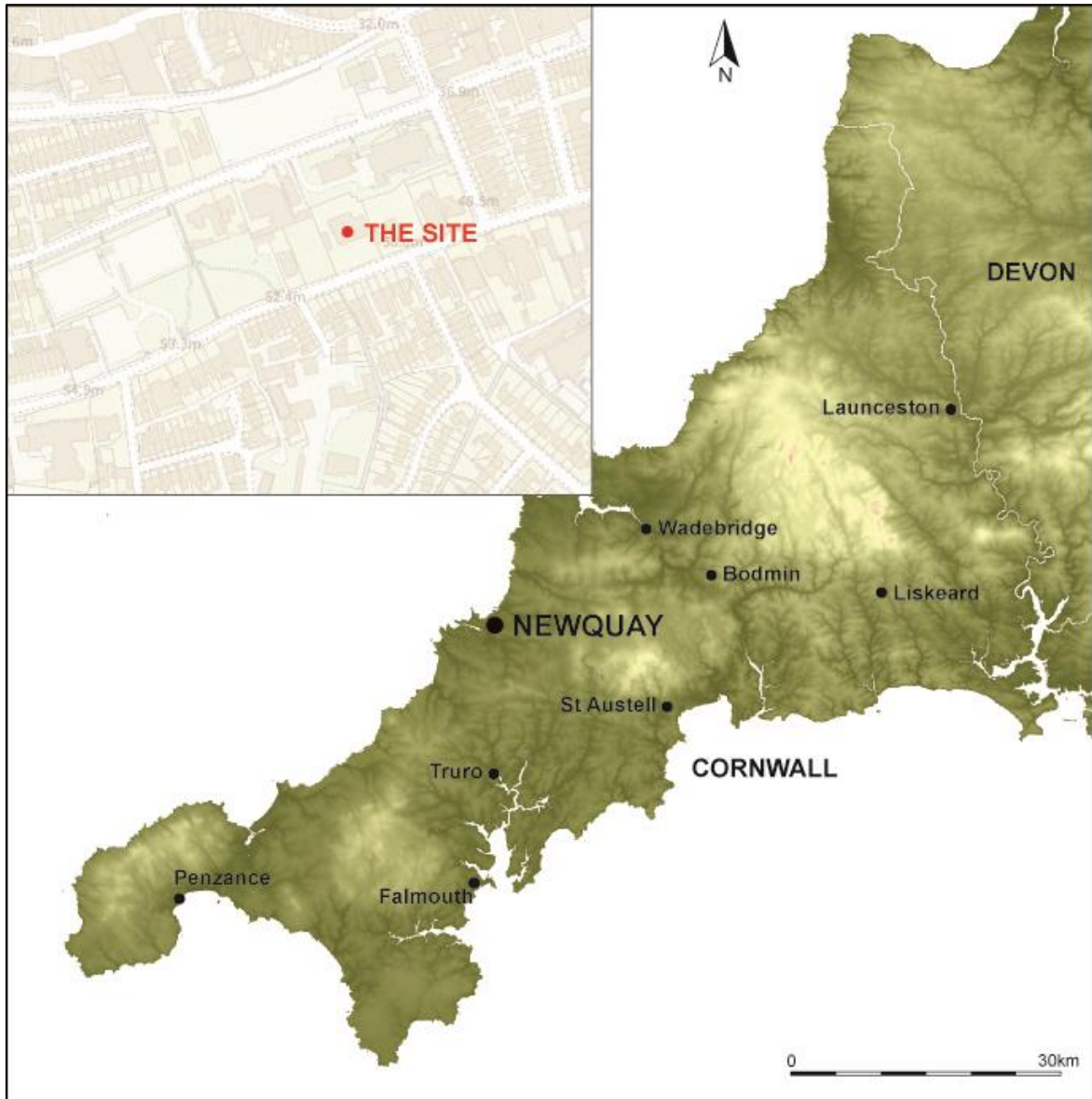


FIGURE 1: SITE LOCATION.

1.4 METHODOLOGY

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

2.0 HERITAGE IMPACT ASSESSMENT

2.1 HERITAGE IMPACT ASSESSMENT - OVERVIEW

The purpose of heritage impact assessment is twofold: Firstly, to understand – insofar as is reasonably practicable and in proportion to the importance of the asset – the significance of a historic building, complex, area, monument or archaeological site (the ‘heritage asset’). Secondly, to assess the likely effect of a proposed development on the heritage asset (direct impact) and/or its setting (indirect impact). The methodology employed in this assessment is based on the approach outlined in the relevant DoT guidance (DMRB LA 104 2020), used in conjunction with the ICOMOS (2011) guidance and the staged approach advocated in *The Setting of Heritage Assets* (GPA3 2nd Ed Historic England 2017). The methodology employed in this assessment can be found in Appendix 2.

2.2 NATIONAL POLICY

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

Paragraph 189

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

Paragraph 194

In determining applications, local planning authorities should require the applicant to describe the significance of any heritage assets affected, including the contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should be consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which a development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Paragraph 195

Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.

Paragraph 206

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

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

In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard

to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

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 STRUCTURE OF ASSESSMENT – DIRECT AND INDIRECT IMPACTS

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

2.5 DEVELOPMENT PROPOSALS

The proposed development comprises a four-storey residential development, providing 19 new apartments on the site of the current small Priory Lodge hotel.



FIGURE 2: PROPOSED ELEVATIONS OF THE RESIDENTIAL DEVELOPMENT (PROVIDED BY THE CLIENT).

3.0 DIRECT IMPACTS

3.1 STRUCTURE OF ASSESSMENT

For the purposes of this assessment, the *direct effect* of a development is taken to be its direct physical effect on the buried archaeological resource. In most instances the effect will be limited to the site itself. However, unlike designated heritage assets (see Section 4.0) the archaeological potential of a site, and the significance of that archaeology, must be quantified by means of a staged programme of archaeological investigation. Sections 3.2-3.5 examine the documentary, cartographic and archaeological background to the site; Section 3.6 summarises this information in order to determine the significance of the archaeology, the potential for harm, and outlines mitigation strategies as appropriate. Appendix 2 details the methodology employed to make this judgement.

3.2 DOCUMENTARY HISTORY

The town of Newquay originated as a coastal hamlet in the medieval period and was known as *Towan Blystra* (CSUS 2003). In 1439 the 'New Quay' was first recorded and the economy of the settlement was primarily related to fishing and small-scale maritime trade from here into the post-medieval period. A new harbour and a tramway linking Newquay to the mining and china clay industries were added in the 19th century, which catalysed the growth of the town. The collapse of the mining and pilchard fishing industries towards the end of the 19th century saw Newquay in decline; however, it emerged as a railway resort, resulting in new wealth and a demand for housing which saw the development of large Edwardian terraced suburbs to house the fashionable visitors it was attracting.

The site lies along Mount Wise, immediately east of the park and south-west of the Parish Church of St. Michael in the centre of Newquay. The Cornwall Historic Landscape Characterisation (HLC) records the site as lying within an area of *Settlement: older core (pre-1907): settled areas from larger farming settlements upwards*.

The parish church of St. Michael was constructed here following the creation of the parish of Newquay from part of St. Columb Minor in 1882. Although there had been a chapel-of-ease in the settlement, it was felt the new Parish warranted its own church, and St. Michael's was built between 1909 and 1911 in Cornish Perpendicular style by Ninian Comper. It is Grade II* Listed.

The planning history for this site details its various additions and extensions, the majority of which took place in the 1980s, shortly after its conversion to a hotel.

TABLE 1: PLANNING APPLICATIONS RECORDED BY CORNWALL COUNCIL ASSOCIATED WITH THE SITE

Date	Planning No	Details
Feb 1979	C2/78/01494	Change Of Use From Private Dwelling To Small Hotel
Jan 1980	C2/79/01454	Erection Of Extension To Existing Hotel
Apr 1980	C2/80/00454	Erection Of Extension To Provide Lounge Extension, Lounge And 9 Additional Hotel Bedrooms
Dec 1980	C2/80/01173	Construction Of Swimming Pool
Nov 1982	C2/82/00656	Erection Of Extension
Jan 1985	C2/84/01010	Erection Of Dining Room Extension With Two Apartment Suites Below
Oct 1985	C2/85/00834	Alterations And Extensions To Hotel
May 1989	C2/89/00516	Erection Of Extension To Provide 2 Hotel Bedrooms
May 2000		Demolition Of Existing Garage/Store/Laundry; Erection Of Store/Laundry/Preparation Room With Owners Residential Unit

3.3 CARTOGRAPHIC DEVELOPMENT

The first available map for this survey is the c.1840 St. Columb Minor Tithe Map. At this time, the site and the surrounding area were still undeveloped, agricultural land, the settlement of Newquay much smaller than it is today. The tithe apportionment records the landowner party as John Tippett and William Carrivick, Executors of the property of Lomax, the landowner; Stephen Hoar is listed as the occupier. The plot is named as '*Manor, Higher Broadpark*' and was arable land. The 1841 census appears to record a number of men named Stephen Hoar/Hoare in this area at this date, so it is difficult to pinpoint which one was the occupier of this plot.



FIGURE 3: EXTRACT FROM THE C.1840 ST. COLUMB MINOR TITHE MAP; THE SITE IS INDICATED (CC).

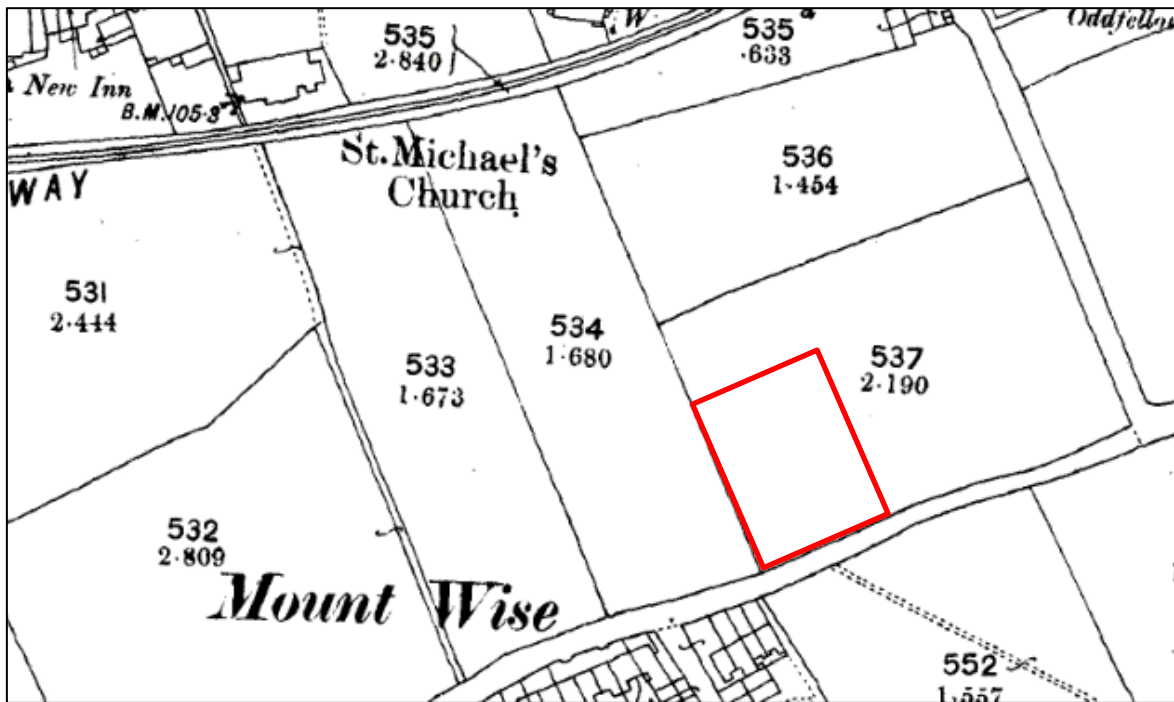


FIGURE 4: EXTRACT OF THE FIRST EDITION OS MAP, c.1885; THE SITE IS INDICATED (CORNWALL INTERACTIVE MAP).

The First Edition Ordnance Survey map of c.1885 shows some changes from the Tithe Map, with the area now labelled as 'Mount Wise'. A number of small, terraced houses have been constructed to the south-west of the site, across the road, and St. Michael's Church is labelled to the north-west, separated from the area around the site by a tramway. The church is likely to be the chapel-of-ease which was extant prior to the construction of the Parish Church in 1909.

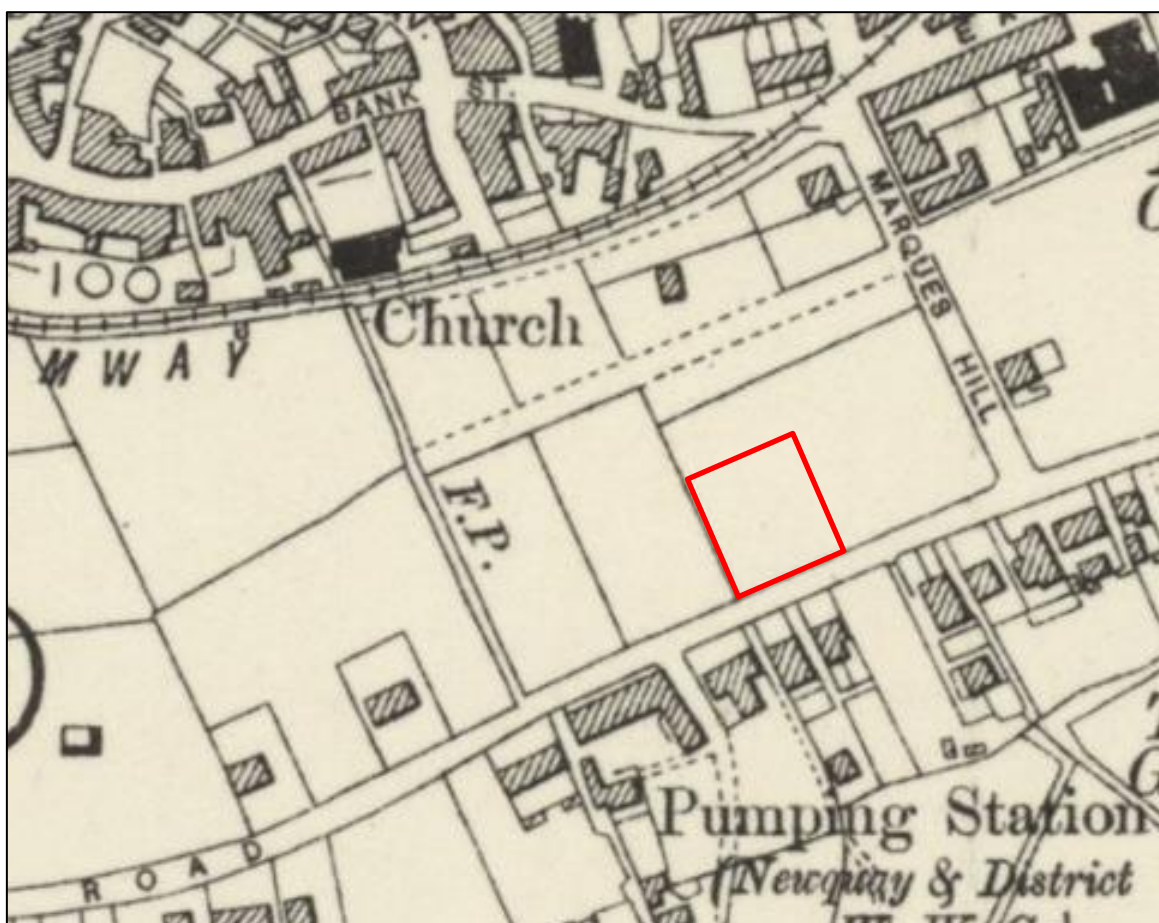


FIGURE 5: EXTRACT FROM THE SECOND EDITION ORDNANCE SURVEY MAP, c.1907 (GENEALOGIST). THE APPROXIMATE PROPOSED SITE IS INDICATED IN RED.

By the early 1900s, the Ordnance Survey Second Edition map (Figure 5) shows the site as an island of undeveloped land in a rapidly changing Newquay. Residential development has taken place to the south-west and a pumping station has been installed. The plots around the site have shrunk or been further divided, and single building developments can be seen in enclosures within some of these, including a small building located in the location of the future church hall, and one on the future St. Michael's Church site.

By the 1934 Ordnance Survey Map (Figure 6), not only has Priory Lodge been constructed (built in 1923), but the Church of St. Michael, its accompanying church hall, and a masonic lodge have been constructed in a row to the north. Marques Hill labelled to the east of the site on the early 20th century map appears to have become Marcus Hill by the mid 20th century.

Priory Lodge was originally built as a vicarage and remained in use during the early 20th century. It was sold to the current owners in 1979 and transformed into a small hotel, originally with 6 bedrooms, but having been altered and expanded over the years to its current 28 bedrooms.



FIGURE 6: EXTRACT FROM THE REVISED SECOND EDITION ORDNANCE SURVEY 25 INCH MAP, REVISED 1934 (NLS). THE PROPOSED SITE IS INDICATED IN RED.

3.1 ARCHAEOLOGICAL BACKGROUND

The proposal site and surrounding area has been subject to significant change during the 20th century. While the site falls into an area covered by the Newquay CSUS in 2003, it does not appear that the site or its immediate surroundings have been subject to any intrusive archaeological investigation. The comment in the CSUS relating to the Mount Wise area of Newquay describes it as: *A predominantly residential area defined by its loose grid plan form and close-set terraces. Properties step up the sloping topography of Mount Wise. The terraces have considerable architectural detailing with projecting bay windows, balconies, porches and gabled dormers common features. Situated close to the commercial core, an area of large plots, civic buildings and car parks is defined. Soft landscaping is provided by the enclosed front gardens and green spaces and street trees are important features of the area.*

Some archaeological work has been carried out in the wider landscape including a building survey of the Wesleyan Chapel to the north east of the site (ECO3086) and c.500m to the south east of the site a geophysical survey and archaeological evaluation was carried out for land at Tregunnel Hill (ECO3538). This encountered features of Neolithic and Bronze Age date (Cotswold Archaeology 2011). A watching brief c.500m to the south of the site at Cheviot Road encountered no archaeological features (ECO2189).

The Cornwall Historic Landscape Characterisation (HLC) records the site as lying within an area of *Settlement: older core (pre-1907): settled areas from larger farming settlements upwards*. Due to the urban nature of the site and the large number of documented heritage assets in this area, a

500m radius around the site has been considered in detail although reference is made to archaeological features and assets within the wider landscape of the site. There are 4 Listed Buildings (1 Grade II*) within 500m of the site. The closest Scheduled Monument to the site is the Enclosure known as Treringey Round c. 900m to the south of the site. There are no Conservation Areas or Registered Parks and Gardens within 1km of the site.

3.1.1 PREHISTORIC 4000BC - AD43

There is limited evidence for Prehistoric activity in the vicinity of the site. Finds of Mesolithic, Neolithic and Bronze Age date are recorded to the south of the site (MCO1052, MCO1054) and a Bronze Age cairn may also have been located in this area (MCO4225). To the south east of the site a Neolithic greenstone axe was documented (MCO1055).

3.1.2 ROMANO-BRITISH AD43 – AD409

There is no documented evidence for Romano-British activity in the vicinity of the site or the surrounding landscape.

3.1.3 MEDIEVAL AD410 – AD1540

There is limited evidence of Medieval activity in the area around the proposed site. The settlement of Newquay dates to the Medieval period and a possible fragment of Medieval field system is recorded to the north of the site (MCO33155). More extensive evidence for Medieval occupation exists in the landscape around Newquay.

3.1.4 POST-MEDIEVAL AD1540 -1899

A number of sites of Post Medieval date are recorded in the Cornwall and Scilly HER within 500m of the site. These largely relate to built structures associated with the expansion of Newquay as a settlement during this period and comprise industrial buildings such as fish cellars, whim engines and a shipyard or else relate to ancillary structures required by the expanding population such as a police station, fire station, non-conformist chapels and schools. A Post Medieval mine is the closest recorded feature to the proposed site, located to the south west.

3.1.5 MODERN 1900-PRESENT AND UNKNOWN

There are a number of Modern sites recorded within the vicinity of the site, the parish church of St Michael being the closest. Other structures include a library, those associated with the supply of utilities within the town and non-conformist chapels.

PRIORY LODGE, MOUNT WISE, NEWQUAY, CORNWALL: HIA

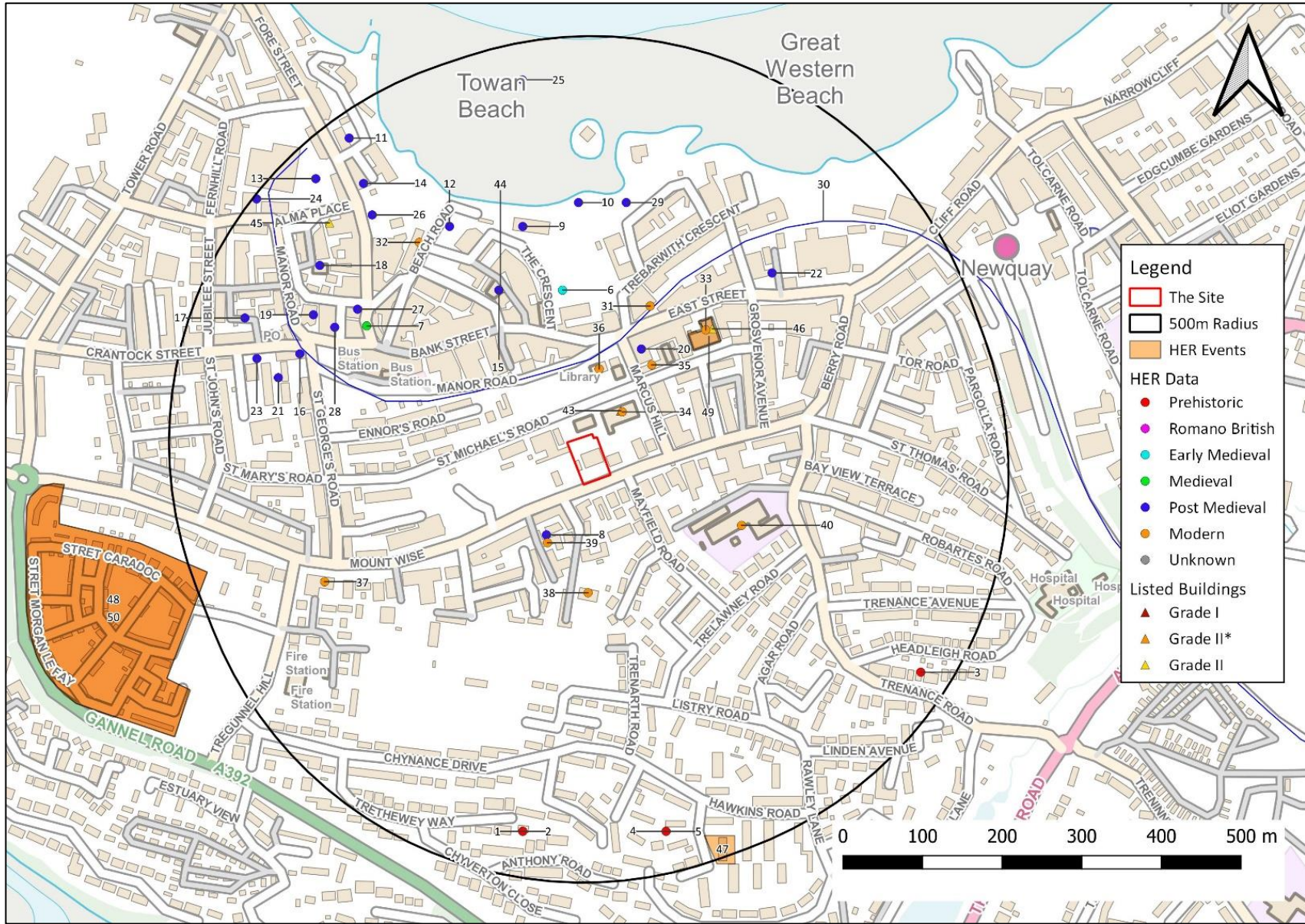


FIGURE 7: HERITAGE ASSETS WITHIN 500M OF THE PROPOSAL AREA RECORDED IN THE CORNWALL HER CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2022.

PRIORY LODGE, MOUNT WISE, NEWQUAY, CORNWALL: HIA

TABLE 2: TABLE OF NEARBY HERITAGE ASSETS (SOURCE: CORNWALL HER).

No	Mon No	Name	Summary
1	MCO1052	NEWQUAY - Neolithic findspot, Bronze Age findspot	A number of early Neolithic/early Bronze Age implements are listed as being found at Newquay.
2	MCO1054	NEWQUAY - Mesolithic findspot	Mesolithic blades from in and around Newquay are now at Truro museum and the British Museum.
3	MCO1055	NEWQUAY - Neolithic findspot	A greenstone axe from Headleigh Manor, Newquay is now at Truro museum.
4	MCO322	NEWQUAY - Bronze Age findspot	A flint adze found in the vicinity of a possible cairn site.
5	MCO4225	NEWQUAY - Bronze Age cairn	The field-name 'Cairn Close' suggests the site of a cairn but there are no remains.
6	MCO33155	NEWQUAY - Early Medieval field system	A small fragment of a ditch-defined field system, possibly medieval or later in date, is visible on vertical aerial photographs taken in 1951.
7	MCO15908	NEWQUAY - Medieval settlement	The settlement of Newquay is medieval in origin, though the placename Newquay is not recorded until 1602. Towan Blistra is recorded in 1308, another alternative name for Newquay. Newquay is still occupied.
8	MCO12305	LEHENVER - Post Medieval mine	The remains of a silver and lead mine.
9	MCO18548	NEWQUAY - Post Medieval fish cellar	Redeveloped site of Post Medieval fish cellars recorded as 'Treffry', built in the 1840s and also known locally as 'Flour and Fat'. Now the site of an aquarium.
10	MCO18573	NEWQUAY - Post Medieval fish cellar	The site of Post Medieval fish cellars known as 'Speculation'. Demolished in 1977.
11	MCO18621	NEWQUAY - Post Medieval fish cellar	The site of the Post Medieval Rose Fish Cellars . Destroyed by a gale in 1886.
12	MCO18640	NEWQUAY - Post Medieval fish cellar	The site of 'Unity Fish Cellars' recorded on Lyson's map also used as a Chapel of Ease. Demolished although there are said to be remains extant
13	MCO23056	NEWQUAY - Post Medieval bark house	The site of a barkhouse indicated by the fieldname "Barkhouse Meadow" on the 1840 Tithe Map.
14	MCO23060	NEWQUAY - Post Medieval lifeboat station	The remains of a life boat house near the south pier Newquay.
15	MCO32973	NEWQUAY - Post Medieval nonconformist chapel	Methodist chapel and attached hall on Beachfield Avenue.
16	MCO32975	NEWQUAY - Post Medieval nonconformist chapel	Methodist chapel on the corner of Crantock St and St Georges St.
17	MCO42611	NEWQUAY - Post Medieval drill hall, Modern firing range	This is a brick built Territorial Army Drill Hall used from 1900 and throughout WW1.
18	MCO52238	NEWQUAY - Post Medieval nonconformist chapel	A Baptist chapel at the end of Broad Street is recorded on the 1st Edition OS map and is still in use.
19	MCO52241	NEWQUAY - Post Medieval nonconformist chapel	A Wesleyan Methodist chapel is recorded at Chapel Hill.
20	MCO52242	NEWQUAY - Post Medieval nonconformist chapel	United Methodist chapel on Marcus Hill is recorded on the 1st Edition OS map c1880 and the building still survives.
21	MCO53111	NEWQUAY - Post Medieval school	Site of Newquay Board Schools, built from 1878 onwards (b1,b2). A number of buildings were added between 1880 and the 1930's. Recorded on the 1st and Second Editions of the 1:2500 1880, 1907 and 1930s Revision map.
22	MCO54210	NEWQUAY - Post Medieval police station	A building at 35 East Street, Newquay, was used as a Police Station from 1897 onwards (b1). The building had been constructed before 1880 and is recorded on the 1st and 2nd Editions of the 1880 and 1907 1:2500 OS Map.
23	MCO54266	NEWQUAY - Post Medieval fire station	
24	MCO57074	NEWQUAY - Post Medieval	The site of a whim engine associated with Treffry's horse drawn tramway.
25	MCO57952	TOWAN BEACH - C20 wreck	The British schooner Bessie went ashore near the Island on Towan Beach, Newquay in 1912
26	MCO65735	NEWQUAY - Post Medieval coastguard station	Site of coastguard station marked on Ordnance Survey historic maps
27	MCO65736	NEWQUAY - Post Medieval smithy	Site of smithy marked on Ordnance Survey historic maps
28	MCO65737	NEWQUAY - Post Medieval smithy	Site of smithy marked on Ordnance Survey historic maps
29	MCO8940	NEWQUAY - Post Medieval shipyard	A shipyard in Newquay was in operation from 1857 to 1872.
30	MCO55075	TREVEMPER - Post Medieval tramway	Post Medieval
31	MCO29125	NEWQUAY - Modern pump house	An extant pumphouse is recorded at this location by Woolf in 1978, who shows a diagram of the feature.
32	MCO29126	NEWQUAY - Modern malt house	Husband records two malthouses on Gover Lane, Newquay.
33	MCO32974	NEWQUAY - Modern	Large Wesleyan Methodist chapel and attached hall by Bell, Withers and

		nonconformist chapel	Meredith.
34	MCO43300	NEWQUAY - Modern church	Newquay parish church.
35	MCO52243	NEWQUAY - Modern nonconformist chapel	'Congregational Hall' is recorded on the 2nd Edition 1907 OS map on Marcus Hill.
36	MCO54385	NEWQUAY - Modern library	County Library, Manor Road/Marcus Hill, built 1962. By County Architect FK Hicklin.
37	MCO56383	NEWQUAY, PENBERTHY - C20 building	Building designed by Alfred Cornelius, Silvanus Trevail's one time apprentice.
38	MCO65732	NEWQUAY - Modern electricity works	Site of electricity works marked on Ordnance Survey historic maps
39	MCO65733	NEWQUAY - Modern pumping station	Site of pumping station marked on Ordnance Survey historic maps
40	MCO65734	NEWQUAY - Modern tennis ground	Site of tennis ground and pavilion marked on Ordnance Survey historic maps
41	MCO23061	NEWQUAY - Undated midden	The site of a midden of unknown date was recorded in 1923 when blown sand was removed for the foundations of cottages just under the path leading to the Baptist chapel.
42	MCO23066	TRENANCE - Undated windmill	A windmill recorded at this approximate location on a 1696 map, no longer survives as the site is no residential, and any remains built over.

3.2 AERIAL PHOTOGRAPHY

The current owners have two mid-20th century aerial photos which provide a good indication of how much the Hotel has changed over the last 50 years. A 1960 image (Figure 8) shows Priory Lodge with extensive gardens to its north and in the plot to the west. There was an in-out drive with a half-circle lawn set against Mount Wise and lined with closely spaced trees. The building was not symmetrically fronted, as it appears now, with a large extension subsequently added to this end, which has also removed the chimney stack, which is prominent in this image. There is one dormer visible in the roof, on the south elevation. It is possible that the building was orientated differently with the east or northern elevation originally intended as the primary façade and access (i.e. approached from and looking at the Church). To this end the tarmac path can be seen angling from the church (just to the right of the photo) towards the Priory Lodge Garden. The northern and western boundaries appear to be lined with mature hedges/trees at this date, perhaps still reflecting their origins as field boundaries.

A 1977 photo suggests some changes (Figure 9), although the building layout appears much as in the earlier photograph and 1930s OS map. Most notably a single storey garage building is shown on the site of detached accommodation block now on the site. The gardens appear very well-maintained, although the land to the west appears very overgrown. It was not long after this photo that the ownership changed, and the site became a hotel.

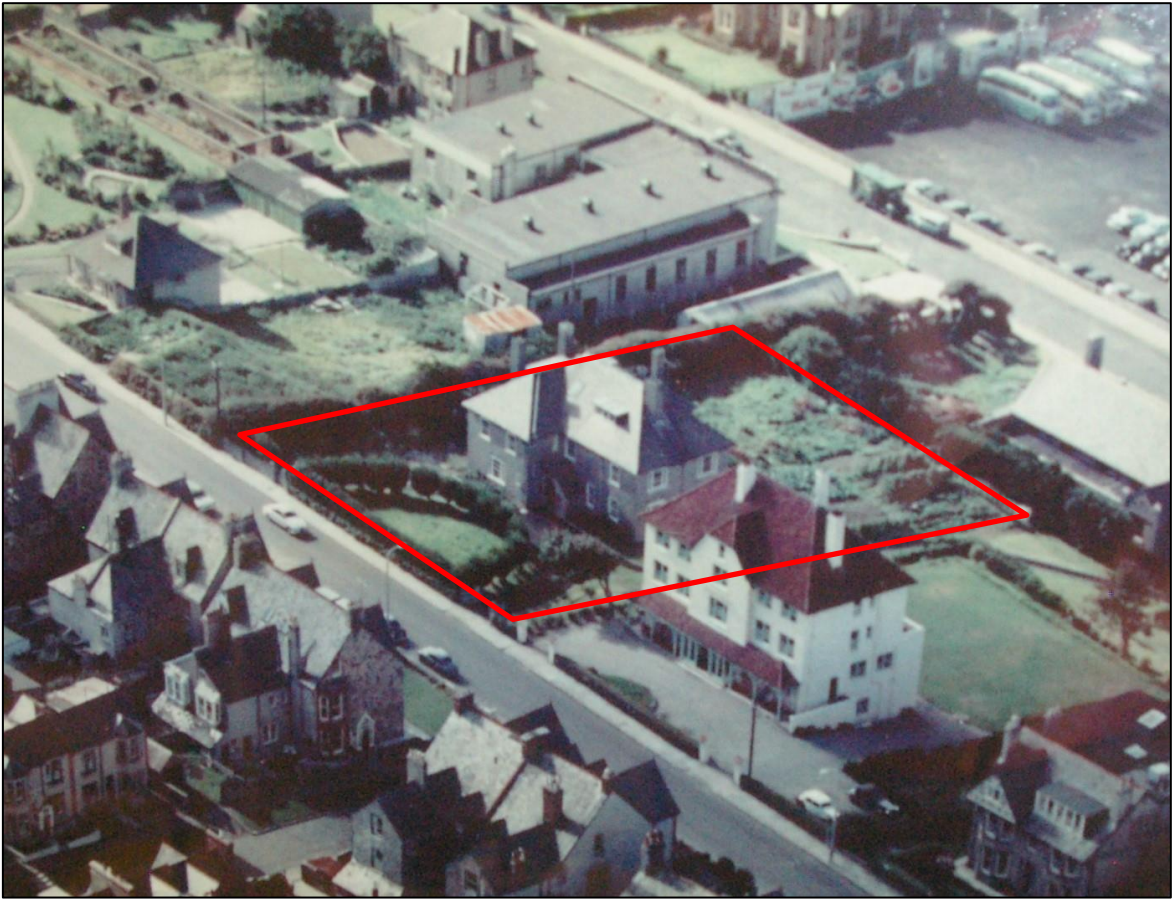


FIGURE 8: AERIAL VIEW OF THE SITE IN 1960 (COURTESY OF THE OWNERS).



FIGURE 9: AERIAL PHOTO FROM 1977 (COURTESY OF THE OWNERS).

A review of readily available aerial photographs shows the site and its use as a small hotel, with the various extensions and swimming pool all constructed prior to 2001. The area does not appear to have changed much over the last 20 years. The property to the east has been renovated in the last few years.



FIGURE 10: AERIAL PHOTO OF THE SITE FROM 2001; ©2022 INFOTERRA LTD & BLUESKY



FIGURE 11: AERIAL PHOTOGRAPH FROM 2022 ©2022 GOOGLE

3.3 WALKOVER SURVEY

A walkover survey of the site was undertaken on the 7th July 2022 in sunny and dry conditions. The site was in use as a hotel, car park and amenity space for hotel guests. Time in and on site was therefore kept to a minimum to minimise any possible disruption.

Site description

The hotel car park covers the entire area in front of the property, with a single tree and narrow strip of grass the only remnant of any former garden. The building presents as a large symmetrically fronted Edwardian style building, with light (creamy) painted rendered walls and slate roof with two concrete rendered chimney stacks to the west (Figure 13).

To the north of the site are terraced paved areas and stairs leading to a swimming pool (Figure 14). The former entrance from the Churchyard was not visible, as hedge and undergrowth obscured any former opening.

The site to the immediate west of the site was under development at the time of visiting, with the site in the process of being stripped. The red tiled roofed, European influenced style property to the east of the site has been recently renovated and stands most prominent in views of the Church (see Figures 16-17).



FIGURE 12: VIEW OF PRIORY LODGE, WITH ST. MICHAEL'S CHURCH IN THE BACKGROUND (VIEWED FROM THE SOUTH-WEST).



FIGURE 13: VIEW OF ST. MICHAEL'S FROM THE REAR OF PRIORY LODGE, VIEWED FROM THE WEST.

3.4 ARCHAEOLOGICAL POTENTIAL AND IMPACT SUMMARY

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

The building is of 20th century date and its use as a hotel and numerous extensions are likely to have limited the survival of any historic features and fittings within the building fabric. The site may have once had the potential to encounter buried archaeological remains, although the level of development on the site over the 20th century likely means that any features would have already been truncated. Damage to any surviving archaeological deposits would be considered **permanent/irreversible**, but it is not felt that any mitigation will be appropriate in this instance due to the high level of truncation that is likely across the Site.

TABLE 3: SUMMARY OF DIRECT IMPACTS.

Asset	Type	Distance	Value	Magnitude of Impact	Assessment	Overall Assessment
Direct Impacts						
Buried archaeological deposits		On site	Unknown – potentially once medium	Major Adverse	(potential) Moderate	(potential) Slight /Moderate adverse
After mitigation						N/A

4.0 INDIRECT IMPACTS

4.1 STRUCTURE OF THE ASSESSMENT

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

The staged approach for the assessment of indirect impacts references the *Setting of Heritage Assets*¹. The aim of this assessment is to identify the designated heritage assets outside the redline boundary that might be impacted upon by the proposed development, determine if an effect on their significance via setting is possible, and establish the level of impact. The staged approach advocated by GPA3 contains the following steps²:

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

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

- Category #1 assets: Where proximity to the proposed development, the significance of the heritage asset concerned, or the likely magnitude of impact, demands detailed consideration.
- Category #2 assets: Assets where location and current setting would indicate that the impact of the proposed development is likely to be limited, but some uncertainty remains.
- Category #3 assets: Assets where location, current setting, significance would strongly indicate the impact would be no higher than negligible and detailed consideration both unnecessary and disproportionate. These assets are scoped out of the assessment but may still be listed in the impact summary table.

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

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

¹ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 9.

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

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

Assessment and documentation, *Step 5*, takes place within this document. The individual asset tables are completed for each assessed designated heritage asset, and, with an emphasis on practicality and proportionality,³ assets are grouped by category (e.g. churches, historic settlements, funerary remains etc.) and provided with a generic preamble that avoids repetitious narrative. This initial preamble establishes the baseline sensitivity of a given category of monument or building to the potential effect; the individual entries that follow then elaborate on local circumstance and site-specific factors. The individual assessments are to be read in conjunction with the overall discussion, as the assessment of impact is reflection of both.

4.2 QUANTIFICATION

Due to the densely urban nature of the site and the form of the proposals, a 250m radius has been considered suitable for the assessment of any likely impacts upon heritage assets as a result of the proposed development. There are 3 Listed Buildings (1 Grade II*, and 2 Grade II) within 250m of the site. The two Grade II Listed buildings both Methodist Chapels with attached halls, were scoped out of the assessment following the site visit.

The only asset selected for assessment was, St Michael's Church. Based on its perceived value and location relative to the site, this has been treated as a *Category #1* asset. All other designated heritage assets within the vicinity of the site were scoped out of the assessment following a site visit due to the lack of visibility of the site to and from their locations as a result of topography and screening effects of other structures.

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

- Category #1 assets: St Michaels Church
- Category #2 assets: None
- Category #3 assets: Both Grade II Methodist/Wesleyan Chapels.

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

4.3 IMPACT BY CLASS OF MONUMENT OR STRUCTURE

4.3.1 CHURCHES AND PRE-REFORMATION CHAPELS

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

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

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

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

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

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

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

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

What is important and why

Churches are often the only substantial medieval buildings in a parish, and reflect local aspirations, prosperity, local and regional architectural trends; they usually stand within graveyards, and these may have pre-Christian origins (evidential value). They are highly visible

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

Asset Name: The Church of St. Michael	
<i>Parish:</i> Newquay	<i>Value:</i> High
<i>Designation:</i> GII*	<i>Distance to Development:</i> c.20m
<p><i>Reason for Designation:</i> The Church of St. Michael is listed at Grade II* for the following principal reasons: * Architectural interest: the church is one of last built in the Gothic-Revival style, by (Sir John) Ninian Comper; * Group value: the church, church hall, formerly a masonic lodge; and Priory Lodge (formerly the vicarage) and the wider area laid out in later 19th and early 20th century in a grand and aspirational style reflecting the 'new town' status of Newquay; the building group share strong visual, physical and historic relationships, although these have been lost through the subsequent re-use of some of these buildings.</p> <p><i>Description:</i> <i>Listing: Parish church. 1909-11, by Ninian Comper. The tower appears to be the last of the building constructed. Squared elvan rubble with granite dressings. Slate roof with ridge tiles and gable ends with raised coped verges. Plan: Nave and chancel in one; north and south aisles, each with a porch, and tower to south west. Perpendicular style. Exterior: The west end of the chancel projects beyond the aisles, with embattled parapet at the north and south sides. 5-light east window with 4-centred arch and hood mould, breather above and cross finial. 3-light window to north and south. South aisle of 9 bays with porch set in third bay from east; all windows are 3-light, with cusped lights and square heads. To left a buttress rising above eaves level with double panelled doors. 4-light east window. West end has 6-light window; ground floor has single storey porch with 4-centred arch doorway with double doors, 2-light window to right and left. The north aisle is of 9 bays with porch in third bay from east. All windows are 3-light with 4-centred arched lights, the central light taller with 4-centred arch and hood mould. Buttress with gablet to right. 2-storey porch with embattled parapet and string courses; 4-centred arched doorway with ogee hood rising to an image niche with shield to right and left. Flight of granite steps leading up to the porch with low walls to sides with granite coping. 2-light window at basement level and single light with door to right; 4-light and 2-light basement window to left. The basement below the porch has 4-light window at the left side and 2-light window to right. The east end of the aisle has 4-light basement window, and 4-light upper window with a lower 2-light section; stair turret with door and octagonal bellcote of 2 storeys with open cusped arches and embattled parapet. The west end has a 6-light window. The nave is visible at the west end only; 4-light window with intersecting tracery and 4-centred arch with hood mould; breather above and cross finial. Flight of granite steps to north leading to a small embattled porch with 4-centred arched doorway. South west tower of four stages on moulded plinth, with string courses and embattled parapet; set-back weathered buttresses rising to pyramidal pinnacles above the battlements. Fourth stage has 3-light bell-openings with crocketed ogee hoods with finials and louvres. North stair tower in three stages with embattled parapet and lancets. First stage east and west a 3-light window; second stage has 2-light window to east, west and north. Interior: Nave, chancel and aisles all have ceiled wagon roofs; the aisles have plain moulded ribs. The nave has a carved wall-plate, ribs and bosses, painted white. The chancel has more elaborate carving, with carved angels on the bosses and moulded cross braces, polychromatic. 9-bay north and south arcades in dark grey unpolished marble, the piers a variation on the Pevsner A-type, with a more prominent inner section and cable-moulded capitals; 4-centred arches of 2 chamfered orders. Doorway from the upper storey of the north porch, leading to the roof loft; the roof screen is carved wood, of high quality, with open arches. The panelled dado panelling is complete around the whole interior. Chancel and south chapel have piscinas; north chapel used as an organ chamber. Fittings: Panelled wooden benches in the nave and aisles. In the chancel the stalls have poppy-head bench-ends. Panelled wooden pulpit in nave. Octagonal stone font in nave with carved sides and carved square foot. Fine organ, of C20, with gilded decorative figures, designed by Sebastian Comper. Sources: Pevsner, N.: Buildings of England: Cornwall 1970.</i></p>	
<p><i>Conservation Value:</i> The church holds evidential value. The church is of local communal value, and it has aesthetic value.</p>	
<p><i>Authenticity and Integrity:</i> The church is well maintained and still functional as a place of worship.</p>	

Setting: The church stands at the corner of St. Michaels Road and Marcus Hill, to the south of the historic core of the settlement. It was once largely surrounded by institutional buildings set in large plots, but many of these have now been replaced, rows of late 19th century houses front the church to the east, and a large car park is located to the south. Its setting is relatively typical for an early 20th century urban Church. As the former vicarage, Priory Lodge forms a significant element of the setting of the church.

Contribution of Setting to the Significance of the Asset: Although a significant public structure, its location was partly chosen for the availability of the land at the time of construction rather than its relationship with the surrounding buildings and landscape, although its proximity to residential areas is significant for its accessibility to its congregation. The church tower was clearly designed to be a prominent landscape feature, visible above the surrounding buildings and marking its importance within the community. The Church formed part of an aspirational layout of the new early 20th century town of Newquay, once it became a parish in its own right and, in common with most parish churches, its vicarage was located adjacent to it. Ultimately the early 20th century layout has become subsumed in the mid and later 20th century developments as the needs of tourists and residents overtook these grander aspirations, e.g. Masonic Lodge, closed and replaced with adventure golf. The railway and former Church of St. Michaels (re-used as an *institute*) both demolished and replaced by car parking and commercial spaces. Any development that detracts from the visual primacy of the church and its tower is considered to have a negative impact upon its setting and the contribution that its setting makes to the significance of the asset.

Magnitude of Effect: Views to and from the church from the proposed development site are likely although the current appearance of the north (rear) elevation of Priory Lodge with its array of relatively unsympathetic 1980s extensions can be seen to have a minor detracting impact on views of the Church. The orientation of the church means that views out from inside the church building towards the development are unlikely, although views from just outside of the entrance are possible. The remains of a footpath runs towards the Site, as when constructed Priory Lodge was initially used as a vicarage. This physical remnant is probably the only visual clue of the former relationship between these buildings. Despite its extensions Priory Lodge still presents as a largely traditional building and its former identity as the Vicarage contributes to the significance of both it and the parish church.

The development represents further development of the area along Mount Wise, with multiple apartment blocks replacing former hotels, pubs and other no longer viable/desirable premises and the cumulative impact of further development of this type on the setting of the Grade II* Listed church should be considered. The proposed development is advised to be of a similar height to the existing building and has the potential to present a more cohesively designed (north facing) elevation than the various hotel extensions currently do, however its design would be critical in achieving this. The present blocky, semi-industrial character of the proposed development has the potential to draw the eye and increase its visual impact and its external cladding could increase this effect (e.g. if shiny/white materials are used which stand out against the existing buildings). This should be mitigated through appropriate design, e.g. the use of vernacular residential styles of this area, such as hipped roof lines.

Significance of Effects: High value asset and moderate change = **Moderate** impact

Magnitude of Impact: Moderate Adverse



FIGURE 14: ST MICHAEL'S CHURCH AND CHURCH HALL VIEWED FROM ST. MICHAEL'S ROAD, PRIORY LODGE IS INDICATED (FROM THE NORTH-NORTH-EAST).



FIGURE 15: ST MICHAEL'S CHURCH VIEWED FROM THE NORTH (THE SITE IS INDICATED).



FIGURE 16: LARGE REDEVELOPED 19TH CENTURY BUILDINGS, MODERN HOTELS AND APARTMENT BLOCKS ALONG MOUNT WISE TO THE SOUTH-EAST OF THE SITE, VIEWED FROM THE NORTH-WEST.

4.3.2 SITE SPECIFIC IMPACT

Whilst the age and nature of Priory Lodge means that it cannot be considered as an undesignated heritage asset of equal value to a designated heritage asset it does however have some value and significance which should be considered as part of this assessment within the context of the proposed development. As a former vicarage and then a hotel the building can be seen to have some communal value to the residents of this area and visitors who may have stayed during its life as a hotel. It is unknown whether its construction was associated with any named architect or designer however it derives historical narrative value from its role in the development of this area of Newquay in the early 20th century and makes a significant contribution to the understanding of the aspirations for this area and to the setting of the Grade II* Listed church. Its aesthetic contribution is more limited on its northern elevation as a result of relatively unsympathetic 1980s extensions however its southern, street facing elevation presents a pleasant façade which enhances the streetscape in this area; the loss of its garden area and in/out circular driveway on the southern side detracts somewhat from its original presentation. Its evidential value is limited, being an early 20th century building which is likely to have been much altered during its life as a hotel.

Overall Priory Lodge provides a context for the development of this area of Newquay and is one of increasingly few remaining early buildings which demonstrate the early 20th century suburban aspirations for this neighbourhood. Its original construction and use as the vicarage, along with its proximity to the Grade II* Listed church contributes to and better reveals the significance the church gains from its setting. The loss of this building would greatly reduce the readability of this landscape as an early 20th century residential development and has the potential to harm the setting of the designated church.

The proposals require the demolition of this building and propose replacement with a four storey apartment block of semi-industrial character, which although believed to be of similar height to the existing Priory Lodge, the proposed rooflines are of entirely different character. The present

hipped gabled roofs of Priory Lodge are visually subservient to the Grade II* Listed church in all views from the north and east.

Priory Lodge is considered a low value heritage asset but its total demolition constitutes a major adverse impact which gives a **slight/moderate** significance of effect.

4.3.3 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 **negligible**. There is the potential for some constructional phase impacts on the heritage assets in closest proximity to the proposed development, predominately in the increased aural intrusion.

4.3.4 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, or 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. Priory Lodge already comprises a large building, in a built-up urban area, and the former garden to the west of the site is currently being developed. No other proposed developments in this area are known. Given the level of development which has taken place around the Grade II* Listed church, the proximity of the proposed development to the designated asset, and the potential to alter the suburban feel of the area, the cumulative impact of this development is considered **moderate**.

4.3.5 HISTORIC LANDSCAPE

The proposed development lies within part of Newquay which mainly developed in the late 19th and early 20th century, with the nearby Church, Church Hall and Priory Lodge all built at approximately the same time, in very different architectural styles. Modern developments have impacted on the character of the area, however Priory Lodge, particularly on its front, road facing elevation, supports the narrative of the early 20th century aspirations for this area of Newquay and provides a context for the setting of the Grade II* Listed church. The loss of this element of the historic landscape could be considered **moderate**.

TABLE 4: SUMMARY OF IMPACTS AND EFFECTS

Asset	Type	Distance	Value	Significance of	Magnitude of	Overall Assessment
-------	------	----------	-------	-----------------	--------------	--------------------

				Effects	Impact	
Indirect Impacts						
St. Michael's Church	GII*	20m	High	Moderate	Moderate Adverse	Moderate/Large Adverse
Wesleyan Methodist Church and Attached Church Hall	GII	120m	Medium	Neutral	No Change	Neutral
Claremont Methodist Church with Attached Church Hall	GII	180m	Medium	Neutral	No Change	Neutral
Priory Lodge	n/a	On site	Low	Slight/Moderate	Major Adverse	Slight/Moderate Adverse
Landscape Character						
Historic Landscape	n/a	n/a	Low	Moderate	Moderate Adverse	Slight Adverse
Aggregate Impact	n/a	n/a			Negligible Adverse	Neutral/Slight Adverse
Cumulative Impact	n/a	n/a				Moderate Adverse

4.3.6 RECOMMENDATIONS AND MITIGATION

From a heritage impact perspective it is recommended that Priory Lodge is retained as an asset which adds value to the narrative of this area of Newquay and makes a significant contribution to the significance of the Grade II* Listed church through its setting. The relatively unsympathetic 1980s extensions could be removed (with the exception of the symmetrical projecting wing on the eastern end which enhances the aesthetic of the original building) and new extensions, more in keeping with the style and aspiration of the original building could be considered.

If demolition of Priory Lodge is considered appropriate the following mitigation measures should be considered:

- The character of any replacement structure should seek to retain the early 20th century suburban character of this neighbourhood. The present proposals appear semi-industrial in character which does not accord with the historic landscape of this area.
- The roofline of any replacement building should be carefully considered so that it is not more visually dominant than the Grade II* Listed church and does not obscure any views of the church which are currently available. The utilisation of hipped, gabled roof lines would help preserve the early 20th century character of this area of the streetscape whilst also intruding less upon the setting of the church than a monopitch roofline may.
- The external cladding of the proposed development should be carefully considered as part of the proposals. Utilising appropriate, vernacular materials on the external faces of the structure, particularly those closest to the Church (i.e. north facing elevation) could reduce the potential visual impact of the proposed structure i.e. it should not stand out in a way that draws the eye towards it. Any proposals should seek to make the north elevation look less blocky and fragmentary than the current building extensions.
- Constructional phase impacts e.g. increased aural intrusion could be lessened in particular with regards to the appreciation of the significance of the Church by ensuring noisy constructional operations do not take place during the main service times.

5.0 CONCLUSIONS

The site lies with the 'modern' town of Newquay a relatively large settlement, which originated as a coastal hamlet in the medieval period known as *Towan Blystra*, a 'New Quay' was first recorded in 1429, but the settlement only rapidly expanded in the later 19th century, initially in association with mining and fishing and industries and then after a brief lull as a railway resort destination, with fashionable Edwardian terrace housing expanding the town.

The site lies off Mount Wise, a Major route through the town and it is south-west of the Parish Church of St. Michael in the centre of Newquay. The Grade II* Listed church of St. Michael was constructed here following the creation of the parish of Newquay from part of St. Columb Minor in 1882. Although there had been a chapel-of-ease in the settlement, it was felt the new Parish warranted its own church, and St. Michael's was built between 1909 and 1911 in a Cornish Perpendicular style by Ninian Comper. A church hall, built in an Arts and Crafts style was constructed to the immediate north at a similar time. The Site - Priory Lodge was built as a vicarage for the New Church in 1923, becoming a Hotel in 1979, and was substantially extended in the 1980s.

The proposed development would see the demolition of all buildings currently on the site and replacement with a four storey, 19 unit apartment building. Due to truncation of the site, direct impacts are likely to be limited. Priory Lodge is considered to be a building which adds value to the narrative of this area of Newquay and makes a significant contribution to the significance of the Grade II* Listed church through its setting. The indirect impacts on nearby designated heritage assets, namely the Grade II* Listed St Michael's Church are considered moderate adverse. There is a potential constructional phase impact on the closest heritage assets in terms of aural and visual intrusion, though this impact will only be temporary.

With this in mind, the overall impact of the proposed development can be assessed as **Moderate Adverse**. Recommendations and proposed mitigation measures have been made as part of this assessment. The impact of the development on any buried archaeological resource may be **permanent** and **irreversible** but is considered unlikely to encounter any archaeological features or deposits.

6.0 BIBLIOGRAPHY & REFERENCES

Published Sources:

- Chartered Institute of Field Archaeologists** 2014 revised 2017 and 2020: *Standard and Guidance for Historic Environment Desk-based Assessment*.
- Chartered Institute for Archaeologists** 2014b revised 2020: *Standard and Guidance for Archaeological Geophysical Survey*.
- English Heritage** 2008a: *Conservation Principles: policies and guidance for the sustainable management of the historic environment*.
- English Heritage** 2011: *Seeing History in the View*.
- Historic England** 2017: *Understanding Place: Historic area assessments in a planning and development context*.
- Historic England** 2017: *The Setting of Heritage Assets (2nd Edition)*
- Historic Scotland** 2016 updated 2020: *Managing Change in the Historic Environment: Setting*.
- Hull, R.B. & Bishop, I.D.** 1988: 'Scenic Impacts of Electricity Transmission Towers: the influence of landscape types and observer distance', *Journal of Environmental Management* 27, 99-108.
- ICOMOS** 2005: *Xi'an Declaration on the Conservation of the Setting of Heritage Structures, Sites and Areas*.
- ICOMOS** 2011: *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties*. International Council on Monuments and Sites.
- Landscape Institute** 2013: *Guidelines for Landscape and Visual Impact Assessment*, 3rd edition. London.
- Soil Survey of England and Wales** 1983: *Legend for the 1:250,000 Soil Map of England and Wales (a brief explanation of the constituent soil associations)*.
- UNESCO** 2015: *Operational Guidelines for the Implementation of the World Heritage Convention*.
- University of Newcastle** 2002: *Visual Assessment of Wind Farms: Best Practice*.

Websites:

- British Geological Survey** 2022: *Geology of Britain Viewer*.
http://maps.bgs.ac.uk/geologyviewer_google/googleviewer.html
- Design Manual for Roads and Bridges (DMRB)** 2020 : LA 104 Environmental Assessment and Monitoring
<https://www.standardsforhighways.co.uk/dmrb/search/Of6e0b6a-d08e-4673-8691-cab564d4a60a>
- Environment Agency** 2022: *LiDAR, Digital Surface Model*.
<https://environment.data.gov.uk/DefraDataDownload/?Mode=survey>

Unpublished Sources:

- Cotswold Archaeology** 2011: *Land at Tregunnel Hill, Newquay, Cornwall: Archaeological Evaluation*

APPENDIX 1: SUPPORTING PHOTOGRAPHS - WALKOVER SURVEY



1. ST. MICHAELS CHURCH, VIEWED FROM THE SOUTH-EAST.



2. ST MICHAELS CHURCH, VIEWED FROM THE NORTH.



3. VIEW OF THE SITE, FROM THE SOUTH-EAST.



4. VIEW OF THE DETACHED ACCOMMODATION BLOCK, VIEWED FROM THE SOUTH.

APPENDIX 2: IMPACT ASSESSMENT METHODOLOGY

Heritage Impact Assessment - Overview

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

National Policy

General policy and guidance for the conservation of the historic environment are now contained within the *National Planning Policy Framework* (Department for Communities and Local Government 2012 revised 2021)⁴. The relevant guidance is reproduced below:

Paragraph 194

In determining applications, local planning authorities should require the applicant to describe the significance of any heritage assets affected, including the contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should be consulted, and the heritage assets assessed using appropriate expertise where necessary. Where a site on which a development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Paragraph 195

Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.

A further key document is the Planning (Listed Buildings and Conservation Areas) Act 1990⁵, in particular section 66(1), which provides *statutory protection* to the setting of Listed buildings:

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

In addition, the Ancient Monuments and Archaeological Areas Act 1979⁶, the Protection of Wrecks Act 1973⁷, and the Historic Buildings and Ancient Monuments Act 1953⁸ also contain relevant statutory provisions.

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

Development within a Historic Environment

Any development within a historic environment has the potential for both *direct* and *indirect* impacts. Direct impacts can be characterised as the physical effect the development may have on heritage assets within, or immediately adjacent to, the redline boundary. These impacts are almost always adverse, i.e. they represent the

⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf.

⁵ <https://www.legislation.gov.uk/ukpga/1990/9/contents>.

⁶ <https://www.legislation.gov.uk/ukpga/1979/46/contents>.

⁷ <https://www.legislation.gov.uk/ukpga/1973/33/contents>.

⁸ <https://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents>.

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

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

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

Significance in Decision-Making

It is the determination of *significance* that is critical to assessing level of impact, whether the effect is determined to be beneficial or adverse. The PPG states: *Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent, and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals*⁹.

The relevant Historic England guidance is *Managing Significance in Decision-Taking in the Historic Environment*¹⁰. The following is a staged process for decision-taking, largely based on that document.

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

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

For designated heritage assets, which have been designated *because* they are deemed significant, Step 1 is relatively straightforward, and Step 2 is also, to a degree quantified, as the determination of significance, to a greater or lesser extent, took place then the heritage asset was designated¹¹. For undesignated heritage of assets comparable value, or for archaeological sites that may have not been investigated (or were unknown or poorly understood prior to identification), a staged process of assessment is required (below).

Once an assessment of value and significance has been made, either by reference to designation or comparable importance if undesignated, the significance of the effect (TABLE 7) and magnitude of the impact (TABLE 8) can be determined. The former is logical and objective, the latter is a more nuanced but subjective, and the accompanying discussion provides the more narrative but subjective approach advocated by Historic England. This is a useful balance between rigid logic and nebulous subjectivity (e.g. the significance of effect on a Grade II Listed building can never be greater than moderate/large; an impact of substantial adverse is almost never achieved). This is in adherence with GPA3¹².

⁹ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>. Paragraph 007.

¹⁰ Historic England 2015: *Managing Significance in Decision-Taking in the Historic Environment Good Practice Advice in Planning Note 2*. Paragraph 6.

¹¹ With the caveat that Listed building descriptions vary in quality between authorities, and interiors may not have been inspected.

¹² Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 19.

In the NPPF, adverse impact is divided into the categories: *total loss*, *substantial harm*, and *less than substantial harm*. The bar for substantial harm was set at a very high level in 2013 by the case *Bedford BC v SSCLG38*. However, following a recent High Court action¹³ it is possible a *major adverse impact* may now qualify as a *substantial harm*. Any lesser adverse impact will constitute a *less than substantial harm*. TABLE 9 shows how this report correlates the two systems.

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

In this context it is useful to remember that *setting is not itself a heritage asset, nor a heritage designation... its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance*¹⁴. Thus it is not simply the contribution to significance that is important, but also how a setting facilitates or hinders an appreciation of the significance of a heritage asset. *The contribution of setting to the significance of a heritage asset is often expressed by reference to views*¹⁵, *but ...setting is different to general amenity. Views out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting*¹⁶. Thus it is possible for views between and across heritage assets and a development to exist without there necessarily being an effect.

In addition, and as PPG states¹⁷: *The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.*

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

Value and Importance

While every heritage asset, designated or otherwise, has some intrinsic merit, the act of designation creates a hierarchy of importance that is reflected by the weight afforded to their preservation and enhancement within the planning system. The system is far from perfect, impaired by an imperfect understanding of individual heritage assets, but the value system that has evolved does provide a useful guide to the *relative* importance of heritage assets. Provision is also made for heritage assets where value is not recognised through designation (e.g. undesignated ‘monuments of Schedulable quality and importance’ should be regarded as being of *high* value); equally, there are designated monuments and structures of *low* relative merit. TABLE 5: THE HIERARCHY OF VALUE/IMPORTANCE (BASED ON THE DMRB LA104 2020 TABLE 3.2N). TABLE 5 Table 4 is taken from the current DMRB; Table 5 refers back to the 2011 DRMB which more usefully defines value in relation to designation.

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

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

¹³ UK Holocaust Memorial in Victoria Tower Gardens in Westminster, reference APP/XF990/V/193240661.

¹⁴ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 9.

¹⁵ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 10. The sentiment is also expressed in the PPG glossary.

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

¹⁷ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>. Paragraph 013.

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

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

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

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

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

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

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

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

Staged Investigation – Direct Impact

The staged approach for the assessment of direct impacts references the publication *Significance in Decision-Taking in the Historic Environment*¹⁸. The aim of this assessment is to establish the *archaeological baseline* for the site and determine the likely significance of the archaeological resource. This staged approach starts with desk-based assessment¹⁹, may conclude with intrusive investigations, and may reference some or all of the following:

1. Documentary research (published works, primary and secondary sources in record offices).
2. Existing archaeological reports or surveys for the site.
3. Historic maps.
4. Archaeological research (historic environment records (HER), event records (HER), Historic England National List; Portable Antiquity Scheme (PLS) records, grey literature reports (available from the Archaeological Data Service).
5. Historic Landscape Characterisation (HLC).
6. Aerial photography (National Mapping Programme, historic aerial photographs (Historic England, Cambridge, Britain from Above), recent commercial photography (Google Earth)).
7. LiDAR analysis (Environment Agency data, TELLUS data).
8. Oral testimony.
9. Walkover survey (or for historic buildings, a historic building appraisal²⁰).
10. Geophysical survey, if suitable (magnetometry, electrical resistance, ground-penetrating radar)²¹.

¹⁸ Historic England 2015: Managing Significance in Decision-Taking in the Historic Environment: *Historic Environment Good Practice Advice in Planning Note 2*.

¹⁹ ClfA 2014 updated 2020: *Standard and guidance for historic environment desk-based assessment*.

²⁰ Historic England 2016: *Understanding Historic Buildings: A Guide to Good Recording Practice*.

11. Archaeological trench evaluation²², if appropriate.

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

Type of Impact

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

Staged Investigation – Indirect Impact

The staged approach for the assessment of indirect impacts references the *Setting of Heritage Assets*²³. The aim of this assessment is to identify the designated heritage assets outside the redline boundary that might be impacted upon by the proposed development, determine if an effect on their significance via setting is possible, and establish the level of impact. The staged approach advocated by GPA3 contains the following steps²⁴:

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

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

- Category #1 assets: Where proximity to the proposed development, the significance of the heritage asset concerned, or the likely magnitude of impact, demands detailed consideration.
- Category #2 assets: Assets where location and current setting would indicate that the impact of the proposed development is likely to be limited, but some uncertainty remains.
- Category #3 assets: Assets where location, current setting, significance would strongly indicate the impact would be no higher than negligible and detailed consideration both unnecessary and disproportionate. These assets are scoped out of the assessment but may still be listed in the impact summary table.

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

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

²¹ ClFA 2014 updated 2020: *Standard and guidance for archaeological geophysical survey*. Schmidt, A., Linford, P. Linford, N. David, A. Gaffney, C., Sarris, A. & Fassbinder, J. 2016: *EAC Guidelines for the Use of Geophysics in Archaeology*.

²² ClFA 2014 updated 2020: *Standard and guidance for archaeological field evaluation*.

²³ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 9.

²⁴ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 9.

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

Assessment and documentation, *Step 5*, takes place within this document. The individual asset tables are completed for each assessed designated heritage asset, and, with an emphasis on practicality and proportionality,²⁵ assets are grouped by category (e.g. churches, historic settlements, funerary remains etc.) and provided with a generic preamble that avoids repetitious narrative. This initial preamble establishes the baseline sensitivity of a given category of monument or building to the potential effect; the individual entries that follow then elaborate on local circumstance and site-specific factors. The individual assessments are to be read in conjunction with the overall discussion, as the assessment of impact is reflection of both.

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

TABLE 10: IMPORTANCE OF SETTING TO INTRINSIC SIGNIFICANCE.

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

Type of Impact

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

Construction Phase

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

Operational Phase

The operational phase of a development is either temporary (e.g. wind turbine or mobile phone mast) or effectively permanent (housing development or road scheme). The effects at this stage are largely indirect and can be partly mitigated over time through design and/or planting. Large development can have an effect on historic landscape character, as they transform areas from one character type (e.g. agricultural farmland) into another (e.g. suburban).

Decommissioning Phase

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

Group Assessment

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

Cumulative Impact

²⁵ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraphs 2, 17, 19, 21, 23, 41.

A single development will have a direct physical and an indirect visual impact, but a second and a third site in the same area will have a synergistic and cumulative impact above and beyond that of a single site. PPG states²⁶: *When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.*

GPA3 states²⁷: *Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it.*

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

Aggregate Impact

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

²⁶ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>. Paragraph 013.

²⁷ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 9.3.

Definitions

Heritage Assets

The NPPF Glossary defines heritage assets as: *A building, monument, site, place, area, or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)*²⁸. This is a fairly broad definition for an expanding range of features, as what is considered of little heritage interest today may – due to location, rarity, design, associations, etc. – be considered of heritage value in the future.

Significance

The NPPF Glossary defines significance as: *The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic, or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting*²⁹.

Conservation Principles

In making an assessment, this report adopts the conservation values (*evidential, historical, aesthetic and communal*) laid out in the English Heritage 2008 publication *Conservation Principles*³⁰. These are used to determine and express the relative importance of a given heritage asset. The definition of those terms is summarised below:

Evidential Value

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

Historical Value

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

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

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

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

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

Aesthetic Value

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

²⁸ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>.

²⁹ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>.

³⁰ English Heritage 2008: *Conservation Principles: policies and guidance for the sustainable management of the historic environment*.

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

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

Communal Value

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

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

Significance in the NPPF

The NPPF operates on a slightly differently set of criteria to the Conservation Principles, a divergent trajectory that will doubtless be addressed when the Conservation Principles are revised. Under the NPPF, value is expressed as *archaeological interest*, *architectural and artistic interest*, and *historic interest*. The following is taken from the NPPF PPG³¹ document, followed by commentary:

Archaeological Interest

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

Architectural and Artistic Interest

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

Historic Interest

An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider

³¹ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>. Paragraph 006.

values such as *faith and cultural identity*. This interest most closely accords with historical value, and extends to include communal value, though with diminished emphasis.

Concepts from World Heritage Guidance

World Heritage Sites are assessed with reference to their own, non-statutory, guidance³². This includes the useful concepts of *authenticity* and *integrity*³³:

Authenticity

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

Integrity

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

Designated Heritage Assets

The majority of the most important ('nationally important') heritage assets are protected through *designation*, with varying levels of statutory protection. These assets fall into one of six categories, although designations often overlap, so a Listed early medieval cross may also be Scheduled, lie within the curtilage of Listed church, inside a Conservation Area, and on the edge of a Registered Park and Garden that falls within a world Heritage Site. The NPPF Glossary defines a designated heritage asset as: *A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation*³⁴.

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.

³² ICOMOS 2011: *Guidance on Heritage Impact Assessment for Cultural World Heritage Properties: a publication of the international Council on Monuments and Sites*.

³³ UNESCO 2021: *Operational Guidelines for the Implementation of the World Heritage Convention*. Paragraphs 79-95.

³⁴ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>.

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.

Registered Parks and Gardens

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

Registered Battlefields

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

World Heritage Sites

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

Setting

The assessment of direct effects to archaeological sites (where the identified heritage asset falls within the footprint of a development and thus is very likely to be damaged or destroyed) is relatively straightforward, the

assessment of indirect effects (where the effect is communicated via impact on the *setting* of a heritage asset) is more nebulous and harder to convincingly predict.

The NPPF Glossary defines the setting of a heritage asset as: *The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral*³⁵.

The principal guidance on this topic is contained within one publication: *The Setting of Heritage Assets: Good Practice Advice* ³⁶. Where the impact of a proposed development is largely indirect, the importance of the setting to the significance of the heritage asset becomes the primary consideration of the impact assessment. The following extracts are from GPA3³⁷:

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

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

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

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

GPA3 states: *The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place...*³⁸ *The Setting of Heritage Assets*³⁹ lists a number of instances where views contribute to the particular significance of a heritage asset:

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

However, as stated in PPG⁴⁰: *Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.*

³⁵ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>.

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

³⁷ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraphs 8, 9.

³⁸ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 10.

³⁹ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 11.

⁴⁰ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#assess-substantial-harm>. Paragraph 013.

Furthermore, as stated in GPA3⁴¹: *Similarly, setting is different from general amenity. Views out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting.*

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

In addition, visibility alone is no clear guide to visual impact. People perceive size, shape and distance using many cues, so context is critically important. For instance, research on electricity pylons⁴² has indicated scenic impact is influenced by landscape complexity: the visual impact of pylons is less pronounced within complex scenes, especially at longer distances, presumably because they are less of a focal point and the attention of the observer is diverted. There are many qualifiers that serve to increase or decrease the visual impact of a proposed development, some of which are seasonal or weather-related.

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

GPA3 also details other area concepts that exist in parallel to, but separate from, setting. These are *curtilage*, *historic character*, and *context*⁴³.

Curtilage

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

Historic Character

The historic character of a place is the group of qualities derived from its past uses that make it distinctive. This may include: its associations with people, now and through time; its visual aspects; and the features, materials, and spaces associated with its history, including its original configuration and subsequent losses and changes. Character is a broad concept, often used in relation to entire historic areas and landscapes, to which heritage assets and their settings may contribute. The concept of character area⁴⁴ can be relevant to developments where extensive areas designations (Registered Parks and Gardens, Registered Battlefields, Conservation Areas, and World Heritage Sites; also towns and larger villages) are divisible into distinct character areas that a development may impact differently due to proximity, visibility etc.

Context

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

Landscape Context

⁴¹ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 16.

⁴² Hull, R.B. & Bishop, I.D. 1988: 'Scenic Impacts of Electricity Transmission Towers: the influence of landscape types and observer distance', *Journal of Environmental Management* 27, 99-108.

⁴³ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 7.

⁴⁴ Historic England 2017: *Understanding Place: Historic Area Assessments*.

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

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

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

Principal Views, Landmark Assets, and Visual Impact

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

On a landscape scale views, taken in the broadest sense, are possible from anywhere to anything, and each may be accorded an aesthetic value according to subjective taste (this is the *amenity value* of views⁴⁵). Given that terrain, the biological and built environment, and public access restrict our theoretical ability to see anything from anywhere, in this assessment the term *principal view* is employed to denote both the deliberate views created within designed landscapes, and those fortuitous views that may be considered of aesthetic value and worth preserving, where they contribute to significance.

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

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

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

⁴⁵ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraphs 14-16.

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



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