

**LAND NORTH OF WINDMILL ROAD  
HIGH HAM  
SOUTH SOMERSET  
SOMERSET**

Results of a Heritage Impact Assessment



South West Archaeology Ltd. report no. 221107



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# Land north of Windmill Road, High Ham, Somerset

## Results of a Heritage Impact Assessment

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Work undertaken by SWARCH for High Ham Community Land Trust (the Client)

### SUMMARY

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*This report presents the results of a heritage impact assessment carried out by South West Archaeology Ltd. (SWARCH) for a proposed residential redevelopment at land north of Windmill Road, High Ham, Somerset.*

*The settlement of High Ham is recorded along with Low Ham as a manor at Domesday, held by the Abbey of St Mary, Glastonbury, who had also held it before Domesday. At the dissolution the manor was granted to Sir John Grey and passed through his family until it was sold in 1629 to Thomas Bennet and John Rolle. The Rolle successors sold the manor, probably before 1764 to John Galton, and it passed to his younger brother Samuel (VCH 2004). The tithe apportionment of 1838 shows the majority of the site area was owned by Samuel Tertius Galton, with the eastern extent in the ownership of William Gare. The manor house and land was sold by Francis Galton in 1854 although the Galton family retained some land in the parish until at least 1896 (VCH 2004). William Gare, the other landowner associated with part of the site appears to have been a farmer, resident at Low Ham.*

*The proposed development would see the construction of 6 houses on part of an agricultural field to the north of Windmill Road. Due to evidence of extensive ploughing of this site, direct impacts are unknown but there is considered to be low potential.*

*The indirect impacts on nearby designated heritage assets, namely the Grade II\* Listed Stembridge Tower Windmill is considered slight 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 **slight adverse** and therefore is considered to be **less than substantial harm**, so the slight harm in this instance will be outweighed by the public benefits of this proposed scheme. The impact of the development on any buried archaeological resource will be **permanent** but can be mitigated if deemed appropriate by the planning authority through a standard archaeological monitoring and recording planning condition.*

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## ACKNOWLEDGEMENTS

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THE LANDOWNER, FOR ACCESS  
THE CLIENT

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## 1.0 INTRODUCTION

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<b>LOCATION:</b>	LAND NORTH OF WINDMILL ROAD
<b>PARISH:</b>	HIGH HAM CP
<b>COUNTY:</b>	SOMERSET
<b>CENTROID NGR:</b>	ST 43061 30627
<b>PLANNING NO.</b>	PRE-PLANNING
<b>SWARCH REF.</b>	HHWR22
<b>OASIS REF.</b>	SOUTHWES1-511078

### 1.1 PROJECT BACKGROUND

South West Archaeology Ltd. (SWARCH) was commissioned by High Ham Community Land Trust to undertake a heritage impact assessment for a proposed residential redevelopment of 6 dwellings at land north of Windmill Road, High Ham, Somerset. This work was undertaken in accordance with best practice and ClfA guidelines.

### 1.2 TOPOGRAPHY

The proposed site is located to the south east of the centre of High Ham, immediately north of Windmill Road. It lies c.620m south east of the village centre. The settlement of Langport lies c3.2km to the south west. The site lies at c.88m AOD, with the ground raising slightly to the north, and falling away to the south.

### 1.3 HISTORICAL & ARCHAEOLOGICAL BACKGROUND

The settlement of High Ham is recorded along with Low Ham as a manor at Domesday, held by the Abbey of St Mary, Glastonbury, who had also held it before Domesday. At the dissolution the manor was granted to Sir John Grey and passed through his family until it was sold in 1629 to Thomas Bennet and John Rolle. The Rolle successors sold the manor, probably before 1764 to John Galton, and it passed to his younger brother Samuel (VCH 2004). The tithe apportionment of 1838 shows the majority of the site area was owned by Samuel Tertius Galton, with the eastern extent in the ownership of William Gare. The manor house and land was sold by Francis Galton in 1854 although the Galton family retained some land in the parish until at least 1896 (VCH 2004). William Gare, the other landowner associated with part of the site appears to have been a farmer, resident at Low Ham.

The proposal site and surrounding area has been subject to some change during the 19<sup>th</sup> and 20<sup>th</sup> century, the main notable change, beside residential development around High Ham, being the abandonment of the windmill to the east of the site and the construction of Stembridge Mill to the south east. The site falls into an area classified as *Anciently Enclosed Land modified in the 17<sup>th</sup> to 19<sup>th</sup> century* in the Somerset and Exmoor Historic Landscape Characterisation. It does not appear that the site or its immediate surroundings have been subject to any archaeological investigation, the only assessments recorded in the Somerset HER to have been carried out in the vicinity are a watching brief at the Primary School, to the north west of the site, which encountered modern disturbance with no archaeological features recorded (24540) and another watching brief at a property on the north western side of High Ham which revealed a linear bank and ditch with a small assemblage of finds from the medieval to modern periods. A 1km radius around the site has been considered in this assessment. There are 26 Listed Buildings (1 Grade I and 1 Grade II\*) within 1km of the site. The closest Scheduled Monument to the site is the Low Ham Roman Villa c.1.65km south-south-east of the site. The High Ham Conservation Area lies c.390m to the west-north-west and the site lies c.280m south-east of the High Ham Area of High Archaeological Importance. There are no Scheduled Monuments or Registered Parks and Gardens within 1km of the site.



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

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### 2.1 HERITAGE IMPACT ASSESSMENT - OVERVIEW

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

### 2.2 NATIONAL POLICY

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

*Paragraph 189*

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

*Paragraph 194*

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

*Paragraph 195*

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

*Paragraph 206*

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

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

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

*Paragraph 207*

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

## **2.3 LOCAL POLICY**

*South Somerset Local Plan 2006-2028:*

*POLICY EQ3: HISTORIC ENVIRONMENT*

*Heritage assets will be conserved and where appropriate enhanced for their historic significance and important contribution to local distinctiveness, character and sense of place. Their potential to contribute towards the economy, tourism, education and local identity will be exploited. All new development proposals relating to the historic environment will be expected to:*

- Safeguard or where appropriate enhance the significance, character, setting and local distinctiveness of heritage assets;*
- Make a positive contribution to its character through high standards of design which reflect and complement it and through the use of appropriate materials and techniques;*
- Ensure alterations, including those for energy efficiency and renewable energy, are balanced alongside the need to retain the integrity of the historic environment and to respect the character and performance of buildings, adopting principles of minimum intervention and reversibility.*

## **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 6 residential dwellings.





FIGURE 2: PLAN OF THE PROPOSED 2 AND 3 BED HOUSES (FROM THE AGENT).

## 3.0 DIRECT IMPACTS

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### 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 settlement of High Ham is recorded along with Low Ham as a manor at Domesday, held by the Abbey of St Mary, Glastonbury, who had also held it before Domesday. They had acquired it from King Edgar as a grant in exchange for Braunton in Devon. At the dissolution the manor was granted to Sir John Grey and passed through his family until it was sold in 1629 to Thomas Bennet and John Rolle. The Rolle successors sold the manor, probably before 1764 to John Galton, a Bristol merchant who later moved to Birmingham and it passed to his younger brother Samuel (VCH 2004).

The tithe apportionment of 1838 shows that the majority of the site area was owned by Samuel Tertius Galton, with the eastern extent in the ownership of William Gare. Samuel Tertius Galton was born in Birmingham, the son of Samuel 'John' Galton who was a prominent member of the Lunar Society which included noted scientists and intellectuals such as Matthew Boulton, Erasmus Darwin, Joseph Priestly, James Watt and Josiah Wedgewood. He married Violetta Darwin, daughter of Erasmus Darwin. He was the father of Sir Francis Galton FRS FRAI. Samuel Tertius Galton acquired his lands in Somerset from his father, Samuel Galton Jnr (Birmingham Archives MS3101/B/16/5), who had inherited them from his father (who had purchased the manor, see above). Documents and papers relating to Samuel Tertius Galton as well as his family members are held by Birmingham Archives and The Wellcome Collection. Francis Galton sold the manor house and land in 1854 to trustees for the Revd. Thomas Marriot Dodington, who was regarded as Lord of the Manor although the Galton family retained some land in the parish until at least 1896 (VCH 2004). William Gare, the other landowner associated with part of the site appears to have been a farmer, resident at Low Ham. He is likely associated with Gare's Farm (PRN 45705), located at the junction of Long Road and the lane linking to Moreton's Lane.

### 3.3 CARTOGRAPHIC DEVELOPMENT

An enclosure act for the parish of High Ham was passed in 1799. The enclosure map shows the site as part of an enclosed field and suggests it was in the ownership of Samuel Galton at this date. The adjacent field, which comprises a small part of the proposed site appears to have been in separate ownership. This map predates the construction of Stembridge Tower Mill, to the south-east of the site and shows an earlier windmill to the east of the site, suggesting it may have been of similar design to the extant Stembridge Tower windmill. A lane is visible to the west and north of the site (Windmill Lane) which clearly provides access to the site of the earlier windmill and surrounding fields.

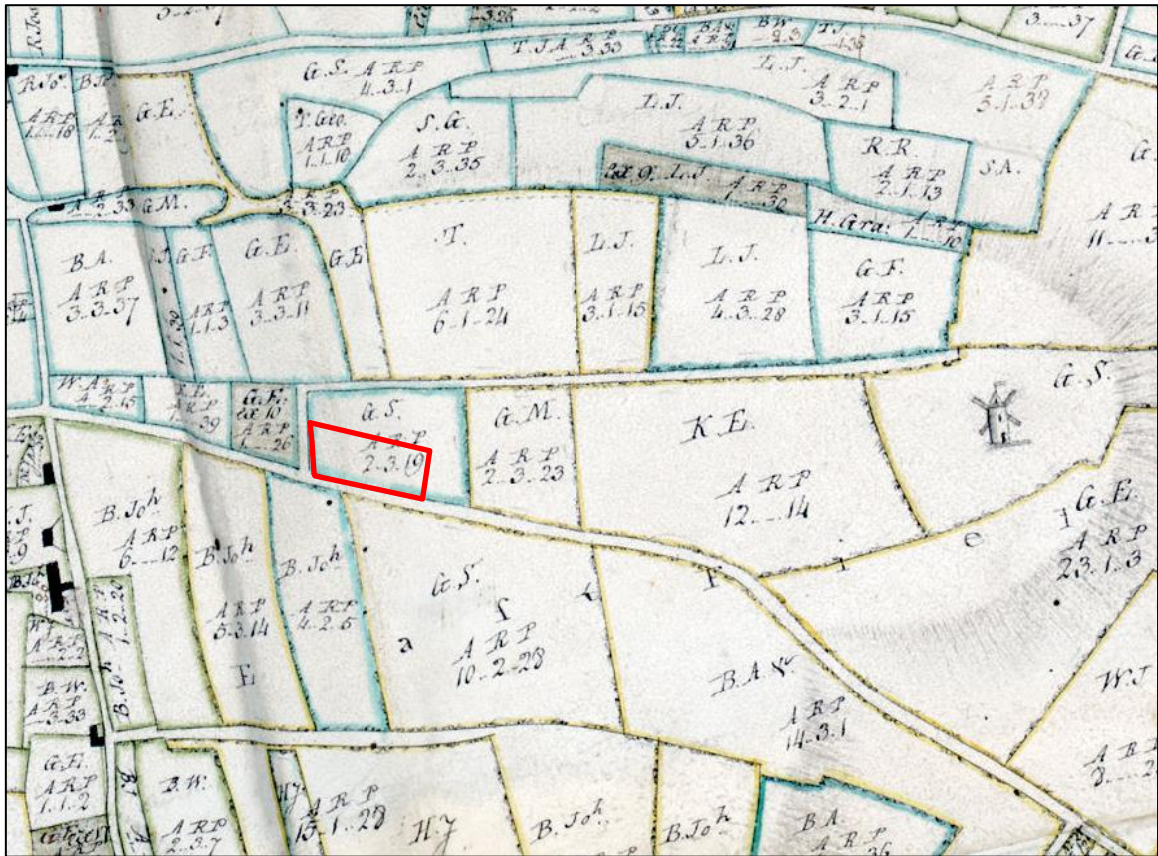


FIGURE 3: EXTRACT FROM THE ENCLOSURE MAP FOR HIGH HAM. THE APPROXIMATE SITE IS INDICATED (KYP)

The 1811 surveyors draft map for Glastonbury which provides a less detailed view of the landscape around the site although the enclosed fields of the surrounding area are visible. Windmill Lane to the north and the earlier windmill are also depicted, and the windmill is named Ham Mill. It appears to be a prominent landscape feature, located on the tip of a spur of land.



FIGURE 4: EXTRACT FROM THE 1811 SURVEYORS DRAFT MAP FOR GLASTONBURY. THE APPROXIMATE SITE IS INDICATED (BL)

The 1840s High Ham Tith map shows a similar field pattern to that of the earlier enclosure map, with detailed depictions of field boundaries and small holdings. Ham Mill is clearly no longer extant by this map with the plot in which is sat named ‘old windmill piece’; Stembridge Tower Mill was built in 1822 and is visible on this map to the south east of the site. A number of smallholdings are visible on the plots to the east of the site, shown as small, isolated dwellings surrounded by gardens. The site itself appears not to have changed during the early 19<sup>th</sup> century. The field names given on the tithe apportionment are largely prosaic although the presence of a number of fields with the same name suggests these may have comprised part of an earlier pre-enclosure field system.



FIGURE 5: EXTRACT FROM THE HIGH HAM TITHE MAP; THE APPROXIMATE SITE IS INDICATED (TNA).

TABLE 1: EXTRACT FROM THE 1838 TITHE APPORTIONMENT FOR HIGH HAM. PLOTS WITHIN THE SITE AREA ARE SHADED GREEN.

Plot No	Landowner	Occupier	Plot Name	Cultivation
276	Martha Tatchell	Robert Tatchell	Arable	Arable
277	Samuel Tertius Galton	William Hurd	Long Stemfurlong	Arable
287	John Sherrin (miller)	John Sherrin	Cottage, Garden and Mill	Garden and Arable
288	James Barnard	James Barnard	Long Stemfurlong	Arable
589	James Lee	James Lee	Cottage and Garden	Garden and Arable
590	Philip Lavis	Phillip Lavis	Cottage and Garden	Garden and Arable
591	Rev. Joseph Shaw and Rev. William Shaw. Henry Edward Dalzell his lessee	Philip Lavis	Short Stemfurlong	Arable
592	Samuel Tertius Galton	William Hurd	Short Stemfurlong	Arable
593	William Gare	William Gare	Short Stemfurlong	Arable
594	?	?	?	?
596	William Reynolds	William Reynolds	Breach Furlong	Arable
597			Little Breachfurlong	Arable
598	Robert Tucker	James Windsor	Breachfurlong	Arable

599	Thomas Howe	Thomas Howe	Cottage, garden etc	Garden and Arable
600	Rev. Joseph Shaw (Glebe)	John Perrin the younger	Breach Furlong	Arable
603	John Gillett	John Gillett	Little Breach Furlong	O Other?
604	Samuel Tertius Galton	John Laver	Meadow	Pasture
686	Samuel Tertius Galton	William Hurd	Old Windmill Piece	A

The First Edition Ordnance Survey map surveyed c.1885 (Figure 5) shows little change to the earlier tithe map although within the area of the site a boundary has clearly been removed. A number of additional buildings are evident to the west of the site, in the locations of the smallholdings shown on the tithe map and additional structures also appear to be shown at Stembridge Tower Mill (named High Ham Corn Mill). A Bible Christian chapel is labelled in the centre of High Ham. A trig point is shown in the location of the earlier Ham Mill, to the east of the site. Windmill Lane and Windmill Hill are marked, clearly referencing the site of the earlier mill. Windmill Road appears to be named Eastfield Road at this time. Little further change is notable on the Second Edition OS map (Figure 6) although Eastfield Road appears to have become Stembridge Road by this date. An old quarry is marked to the west of the corn mill

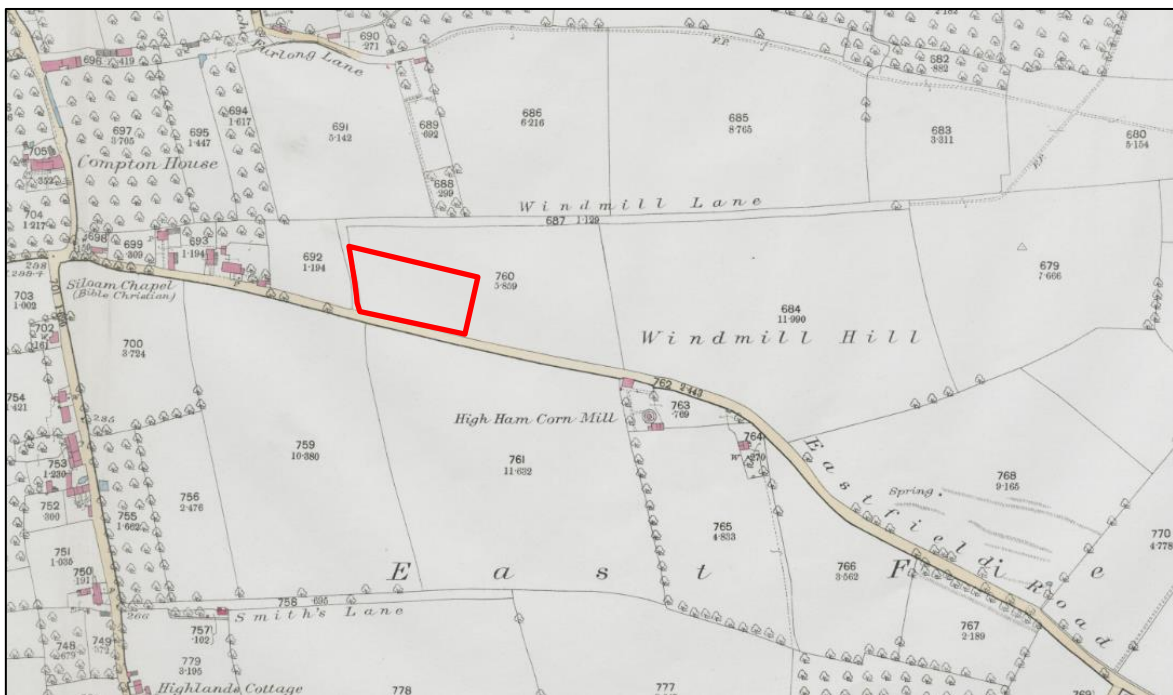


FIGURE 6: EXTRACT FROM FIRST EDITION ORDNANCE SURVEY MAP c.1885. THE APPROXIMATE SITE IS INDICATED (NLS)

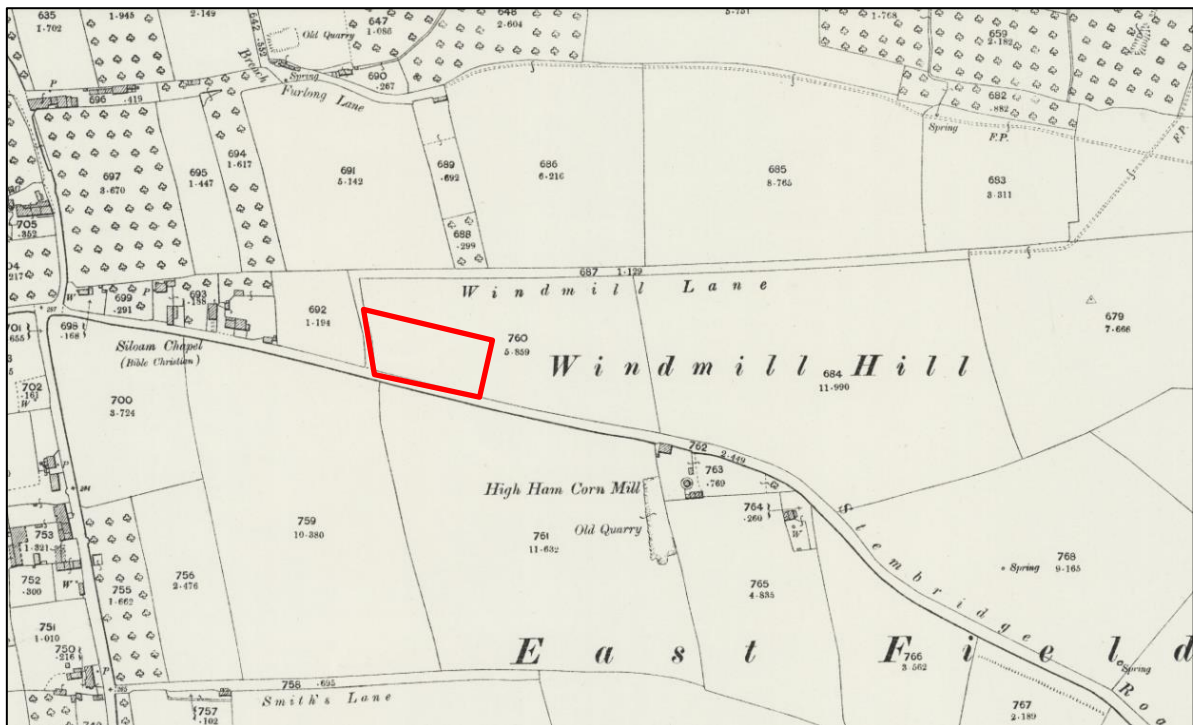


FIGURE 7: EXTRACT FROM THE SECOND EDITION 25 INCH ORDNANCE SURVEY MAP, C.1902 (NLS). THE APPROXIMATE SITE IS INDICATED

### 3.1 ARCHAEOLOGICAL BACKGROUND

The proposal site and surrounding area has been subject to some change during the 19<sup>th</sup> and 20<sup>th</sup> century, the main notable change, beside residential development around High Ham, being the abandonment of the windmill to the east of the site and the construction of Stembridge Mill to the south east. The site falls into an area classified as *Anciently Enclosed Land modified in the 17<sup>th</sup> to 19<sup>th</sup> century* in the Somerset and Exmoor Historic Landscape Characterisation, and borders *Anciently enclosed land pre 17<sup>th</sup> century* and *Settlement, post tithe map*. It does not appear that the site or its immediate surroundings have been subject to any archaeological investigation, the only assessments recorded in the Somerset HER to have been carried out in the vicinity are a watching brief at the Primary School, Lane to the north west of the site, which encountered modern disturbance with no archaeological features recorded (24540) and another watching brief at a property on the north western side of High Ham which revealed a linear bank and ditch with a small assemblage of finds from the medieval to modern periods. It is possible the ditch marked a medieval land boundary (24553).

A 1km radius around the site has been considered. There are 26 Listed Buildings (1 Grade I and 1 Grade II\*) within 1km of the site. The closest Scheduled Monument to the site is the Low Ham Roman Villa c.1.65km south-south-east of the site. The High Ham Conservation Area lies c.390m to the west-north-west and the site lies c.280m south-east of the High Ham Area of High Archaeological Importance. There are no Scheduled Monuments or Registered Parks and Gardens within 1km of the site.

#### 3.1.1 PREHISTORIC 4000BC - AD43

There is little evidence for Prehistoric activity in the vicinity of the site with no sites or monuments from this period recorded within 1km of the site.

### 3.1.2 ROMANO-BRITISH AD43 – AD409

There is no documented evidence for Romano-British activity in the vicinity of the site however the Low Ham Roman Villa site lies to the south east of the site and a further Roman Villa is located to the east-south-east of the site, north of Stowey Hill.

### 3.1.3 MEDIEVAL AD410 – AD1540

A number of features of Medieval or likely Medieval date are located in the landscape around the site. To the east and south of the site areas of Medieval cultivation including ridge and furrow have been recorded. The site of a windmill, to the east of the site may have its origins in the Medieval period (53976). Within the settlement of High Ham, the Grade I Listed Church of St Andrew was first documented in the 12<sup>th</sup> century (53972) and two buildings, Hall Farm (41588) and Hillbourne (51771) also contain Medieval fabric.

### 3.1.4 POST-MEDIEVAL AD1540 -1899

A majority of heritage assets recorded in the vicinity of the site are of Post Medieval date. Many of these relate to residential properties within the settlement of High Ham, which expanded during this period. The Meare to Langport Turnpike road runs through High Ham to the west of the site (36408). The closest assets of Post Medieval date to the proposed site are Stembridge Mill (53975) and the Bible Christian Chapel on Windmill Road (19648).

### 3.1.5 MODERN 1900-PRESENT AND UNKNOWN

Assets of modern date are recorded within the settlement of High Ham and include two 20<sup>th</sup> century war memorials and Ham Court. A number of features of unknown date are documented in the landscape around the site and comprise cultivation earthworks, drainage and, to the south of the site, an earthwork enclosure (38764).

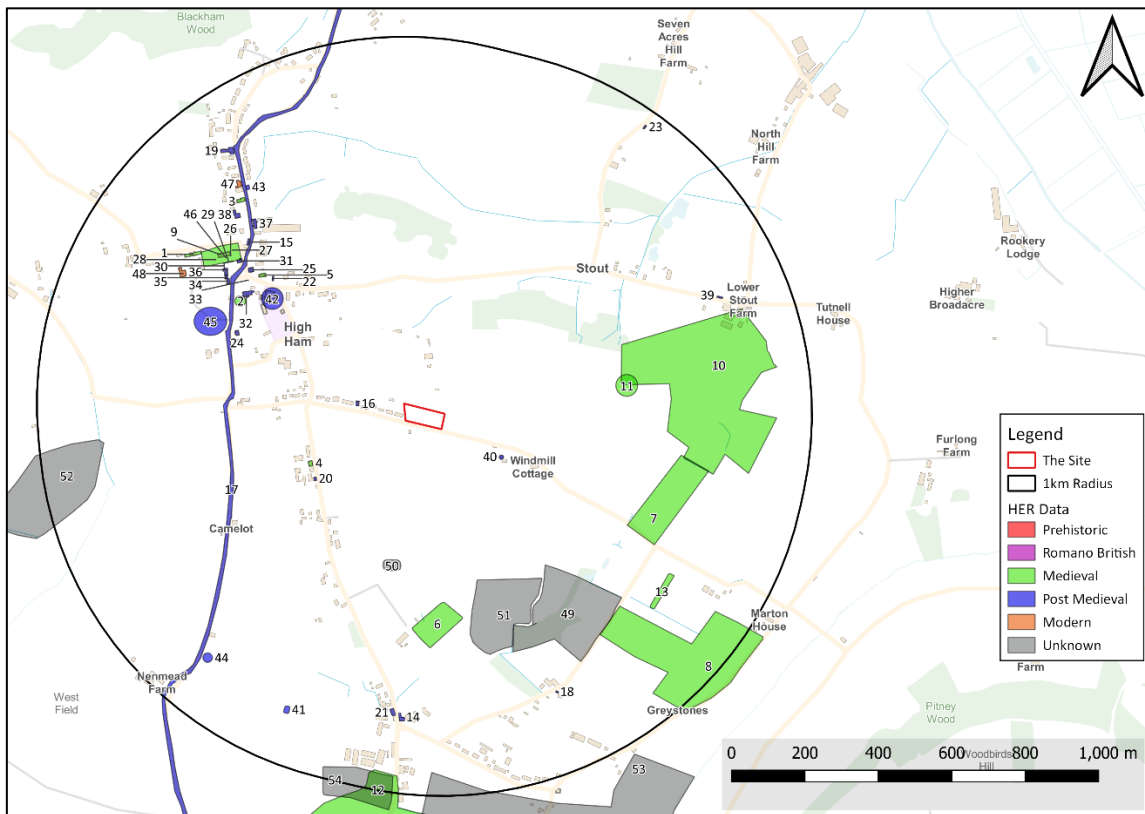


FIGURE 8: HERITAGE ASSETS WITHIN 1KM OF THE PROPOSAL AREA RECORDED IN THE SOMERSET HER CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2022.

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

No	PRN	Name	Summary
1	24554	Boundary Bank and Ditch, Lyneham, Turnhill Road, High Ham	An evaluation and subsequent watching brief (24553) revealed a ditch and bank running in parallel and oriented east-west. The ditch was c. 2m wide and the bank was c.5m wide. C13-14 pottery in the fill may date it to this time when it probably functioned as a boundary.
2	36409	Site of medieval rectory, High Ham	The rectory house was a high status building of the late 14th century, much altered in the early 16th. It was restored in the later 16th century. In 1863 it was demolished and replaced by a new house (51785) on a site between it and a barn and stables.
3	41819	Hall Farm, High Ham	Early C16 house
4	45704	Long Street Farm, High Ham	Possibly of early C17 two room plan and originally of a single storey.
5	51771	Hillborne, High Ham	Three rooms in line with a cross passage probably originating in C15, partially rebuilt in C16
6	52916	Ridge and furrow cultivation, SE of Stone Farm, High Ham	Possible medieval or post-medieval ridge and furrow, faintly visible as bank earthworks in the 2012 20cmhillshade and Slope elevation data. The ridge and furrow extends NE/SW
7	52950	Ridge and furrow cultivation, Sedgemoor Hill, High Ham	Very faint possibly medieval or post-medieval ridge and furrow, visible as earthworks in the 2012 20cmhillshade and Slope elevation data. The ridge and furrow extends NE/SW.
8	52959	Ridge and furrow cultivation, W of Marton House, High Ham	Fields of possibly medieval or post-medieval ridge and furrow, visible as earthworks in the 2012 20cmhillshade and Slope elevation data. The ridge and furrow extends NW/SE. The ridges are also faintly visible in Google Earth images (1/1/2001). However, it is also possible that the features relate to modern agricultural activities.
9	53972	Church of St Andrew and churchyard, High Ham	A church existed by 1168. The W tower is C14 but the rest was rebuilt in late C15.
10	53973	Field system, Sedgemoor Hill, High Ham	Dewar reports that lynchets and cultivation strips were visited by CA Raleigh Radford in 1949 and regarded as medieval. In 1966 this was a well-defined medieval field system with lynchets up to 5.0m high.
11	53976	Windmill, Sedgemoor Hill, High Ham	Newcourt's map of 1660 shows a windmill on Sedgemoor Hill. Drawn in elevation as a tower mill on an estate map of the manor of Netherham of 1779 and probably worked until the early C19 when Stembridge mill (53975) was built to replace it. John and Agnes Gascoyne were given the right to a mill at High Ham in 1339
12	54994	Medieval settlement, W of Low Ham, High Ham	Shrunken possibly medieval village site at Low Ham with earthwork enclosures. Banks and ditches are visible as earthworks in the 2012 10cm and 20cm Hillshade and Slope elevation data.
13	55008	Field remains, S of Sedgemoor Hill, High Ham	Medieval lynchets and cultivated strips. The location may be incorrect and may actually refer to 26088. A large bank which runs NE-SW across the field may represent a lynchet or possibly a natural break in slope.
14	17633	Yew Tree farmhouse, Long Street, Low Ham	Farmhouse. Circa late C16 or early C17; extended C17; remodelled C18; altered C19 and extended C20. Coursed lias stone. Plain tile roofs with Ham stone coping to gable ends. Brick axial and gable end stacks.
15	19647	Smithy, High Ham	'Smithy' shown on 1887 Ordnance Survey map. Building not extant on recent map
16	19648	Bible Christian Chapel, Windmill Road, High Ham	Siloam chapel was built for the Bible Christians in 1841. In 1907 it became part of the United Methodist church. It closed in 1972.



17	24621	Eighteenth-century Turnpike road, Meare to Langport	The only turnpike road of the High Ham and Ashcott Trust. It was turnpiked throughout in 1826.
18	32621	Rose Cottage, Low Ham, High Ham	Rose Cottage added to the List 22/9/2014.
19	36408	The King's Head, High Ham	Licensed by 1828 and still open in 2000.
20	45703	Long Street Cottage, High Ham	A three room and cross-passage house dated to the mid C16 by the hall ceiling and fireplace but these are almost certainly insertions into a medieval house
21	45705	Gares Farm, High Ham	The roof has been replaced but the house is undoubtedly of the early C17 and was possibly a rebuild of an earlier house.
22	51772	Cottage 20 metres east of Hillbourne, High Ham	Detached cottage. Early C19. Local lias stone roughly cut and squared, triple roll clay tile roof between stepped coped gables; brick end chimney stacks. Two storeys, 3 bays irregular fenestration. Small-pane casement windows, mostly 2-light, with dovetailed stone lintols below and timber lintols above; plain boarded door in cambered arched wood frame, in matching opening right of bay 2. Small lean-to on north gable. Interior not seen.
23	51775	Rosemary Cottage, Cooke's Lane, Stout	Detached cottage. Possibly C17. Local lias stone random laid; thatched roof hipped at south end; brick end chimney stacks. Two storeys; 3 bays, of which bay 3 is later. Casement windows of 2-lights, the frames of early date, no window upper bay 3; lower windows have roughly voussoired flat heads; between bays 1 and 2 a boarded door in heavy frame, under thatched hood; later single-storey extension to north gable, with hipped thatched roof; C20 lean-to against south gable. Interior not seen, but noted was a fireplace with cambered arched timber lintol in north gable.
24	51776	South End House, Field Road, High Ham	Detached house. c1840. Local lias stone cut and squared, Ham stone dressings; hipped Welsh slate roof; stone chimney stack. In a villa style. Two storeys, 3 bays
25	51777	Laburnum House, The Green, High Ham	House, with former shop and Post Office. C18. Local lias stone, rendered; triple roll clay tile roof between stepped coped gables, rendered end chimney stacks. Two storeys, 3 bays. Sash windows of 12 panes in plain openings; to lower bay 2 recessed doorway with C20 wrought iron gate. In west gable two projecting flat-roofed shop windows with door between, and 12-pane sash window over: outshut to rear. Interior not seen
26	51779	Unidentified monument in churchyard 3 metres south of chancel, Church of St. Andrew, The Green, High Ham	Chest tomb. Late C17. Ham stone, Base buried; plain ends and north flank but south flank has two semi-circular arched panels with keystone decoration; cyma-recta coved heavy flat top. Inscriptions lost.
27	51780	Swain Travers monument in Churchyard, 9 metres east of Chancel, Church of St. Andrew, The Green, High Ham	Chest tomb. C19. possibly reuse of C18 tomb. Ham stone. Moulded base; ends have fielded panels, flanks have single fielded panel with triple-panel end pilasters; moulded hipped top. Commemorates Ann Swain Travers died 1836, and her husband George, died 1838.
28	51781	Gillet monument in churchyard, 17 metres south West of Tower, Church of St. Andrew, The Green, High Ham	Altar tomb with obelisk. Late C18. Ham stone. Moulded base; cuboid plinth with moulded cap; step and squat panelled obelisk. Commemorates Francis Gillet, Gent., died 1792, and others of family

29	51782	Portion of south boundary wall with railings, 15 metres south of Church of St. Andrew, The Green, High Ham	Boundary wall and railings. C19. Local lias stone cut and squared, lias stone copings; cast-iron railings about 600 mm high above, of heavy pattern with cross/fleur-de-lys caps; heavy matching gates cast in one piece with cusped tracery bottom rail and cusping to middle and top rails, hung on ogee-braced standards. Important element in setting of church and the village green
30	51783	Portion of east boundary wall to Ham Court, 15 metres south of Church of St. Andrew, The Green, High Ham	Portion of boundary wall with gate. Early C19. Random unsquared lias stone with shaped Ham stone copings, about 3 metres high, with small panel in pierced work, Gothic style, and central pointed orchard gateway with pointed arched gable over, in Strawberry Hill Gothic style. Adds to setting of Churchyard, which it abuts, and east side of village green generally.
31	51784	School House, The Green, High Ham	Detached house. 1570 and later. Local lias stone cut and squared, Ham stone dressings; clay pantiled roof between coped gables; brick end chimney stacks. Two storeys, 3 side bays
32	51785	The Old Rectory, The Green, High Ham	Former Rectory, now School. Mid C19 by John Norton. Local lias stone cut and squared, with bands of redstone, Ham stone dressings; plain clay tile roof with bands of fish scale tiles between coped gables; stone chimney stacks.
33	51786	Gateway 30 metres north of The Old Rectory, The Green, High Ham	Gateway. C19. Ham stone piers, wood gates, square piers with chamfered plinth, castellated and gabled tops to plain shaft; C20 vertical rail timber gate; curved side sweep walls in lias stone with chamfered Ham stone copings. Of value in setting of both the Old Rectory (qv) and the village green.
34	51787	Dobyns, The Green, High Ham	Former rectory. Mid C19. Local lias stone cut and squared, Ham stone dressings; Welsh slate roof between stepped coped gables; brick end chimney stacks. Two storeys, 3 bays.
35	51788	Cottage-on-the-Green (formerly listed as an attached tenement to Wheelwrights Cottage), The Green, High Ham	Cottage in row. C18 probably. Local lias stone cut and squared; triple roll clay tile roof, plain verges; brick chimney stacks. Two storeys, 3 bays.
36	51789	Wheelwrights Cottage, The Green, High Ham	Cottage, formerly 2 or more. C18 probably. Local lias stone cut and squared; clay pantiled roof, the north portion between stepped coped gables; brick chimney stacks. Single-storey with attics, 3 plus 2 bays
37	51794	Manor Farmhouse, High Ham	Detached farmhouse. Later C17. Local lias stone cut and squared, random coursed, Ham stone dressings; triple roll clay tile roof between coped gables, with evidence of raised roof; brick chimney stacks. 'E'-plan, with later extension to south: 2 storeys,
38	51795	The Grange, High Ham Village	Detached house. Early C19. Ham stone ashlar; hipped Welsh slate roof; two central ashlar stone chimneystacks. Villa style. Two storeys, 3 bays.
39	51807	Cottage 50 metres west of Lower Stout Farmhouse - not included in list, Stout	Detached Cottage. c1800 or earlier, Local lias stone roughly cut and squared; thatched roof with plain gables; brick end chimney stacks with traditional baffles. Single-storey with attic, 2 bays, with a 1-bay C20 addition to east.
40	53975	Stembridge windmill, High Ham	Built in 1822 on what was part of East Field. Incorporated some of Ham mill (53976) which it replaced. The tower, of random coursed lias stone, is parallel sided to above the heads of the first floor opposite doorways and then tapers quite steeply to the curb. Thatched gable-shaped end is unique in England, and the mill was winded by an endless chain geared to a worm meshing with a rack on the outside of the curb. The sails have no stocks, the frames being supported by backs which are bolted to an iron coffin cross fixed to the end of the timber windshaft. The sails were set from a

			circular earth and masonry mound built up around the base of the tower. Mill contains four floors and incomplete gearing
41	53979	Possible windmill, NW of Low Ham	"Mill mote" named on 1779 manor map of Netherham. {1} Not mentioned by Coulthard and Watts. {2} Possible post-medieval windmill mound visible as a roughly oval or sub-rectangular mound in the 201220cm Hillshade elevation data. The mound measures approximately 17m NNE/SSW by 12m WNW/ESE.
42	53991	Church House, High Ham	Was built in 1598 when Adrian Schael, rector of High Ham, pulled down the old parish house called church house.
43	53994	Pound, High Ham	Pound originally belonged to Manor farm but was sold to the County Council Highways Department for use as a store. In more recent years it has been bought by the Parish Council and now has a bench from which to admire the view.
44	53995	Lime kiln, Field Road, Low Ham	"Old limekiln" printed on OS 25" map.
45	54000	Earthworks, S of village green, High Ham	SW of the village green there are earthworks which may represent the former layout of a garden or park entrance associated with a large building shown on the C18 map in the grounds of the present vicarage(now Millfield School
46	17810	War memorial, church of St Andrews, High Ham	War memorial to the dead of the First World War consisting of a cross on an octagonal base upon twosteps. There is a circlet of angels bearing shields at the top, surmounted by the calvary-style cross
47	32603	First World War memorial hall, High Ham	Built in memory of the 18 members of the parish who died in the First World War and funded by public subscription. Officially opened on 15 July 1925, although not fully complete
48	36407	Ham Court, High Ham	Built in 1906.
49	26088	Lynchets, north of Bramwell, High Ham	Possible lynchets visible on aerial photograph, running north east to south west.
50	38764	Earthwork enclosure, N of Stone Farm, High Ham	Possible enclosure of unknown date, visible as a ditch earthwork in the 2012 Near Infrared, Hillshade and Slope elevation data. Alternatively, the feature could be related to modern agricultural activities. The roughly C shaped feature has a 'back' that extends roughly 20m N/S, with two 'arms' that extend E/W for roughly 40m.
51	52474	Cultivation earthworks, N of Bramwells Farm, High Ham	Five banks visible as earthworks in the 2012 20cm hillshade and Slope elevation data. The banks could be associated with the lynchets (26088) to the east; however, they may also indicate ridge and furrow. The banks are roughly parallel and extend roughly N/S. The banks appear to continue faintly to the north and south.
52	53990	Cropmark enclosure, off Taunton's Lane, Westfield, High Ham	Cropmark of a rectangular enclosure on a slope facing SSE.
53	54992	Drainage ditches, W of Fir Tree Farm, High Ham	Series of banks and ditches visible as earthworks in the 2012 20cm Hillshade and Slope elevation data. A large ditch extends roughly north/south with a bank on the western side. A series of narrower ditches extend in curved lines roughly WNW/ESE. The features could be related to modern field drainage. The features appear similar to the banks and ditches recorded as 54993
54	54993	Field drainage, N of Low Ham, High Ham	Five fields with narrow banks and ditches, of unknown date, visible as earthworks in the 2012 20cmHillshade and Slope elevation data. The banks and ditches are all aligned roughly WNW/ESE and are roughly parallel. The features may be associated with modern field drainage or agricultural activities. They appear similar to the banks and ditches recorded as 54992.

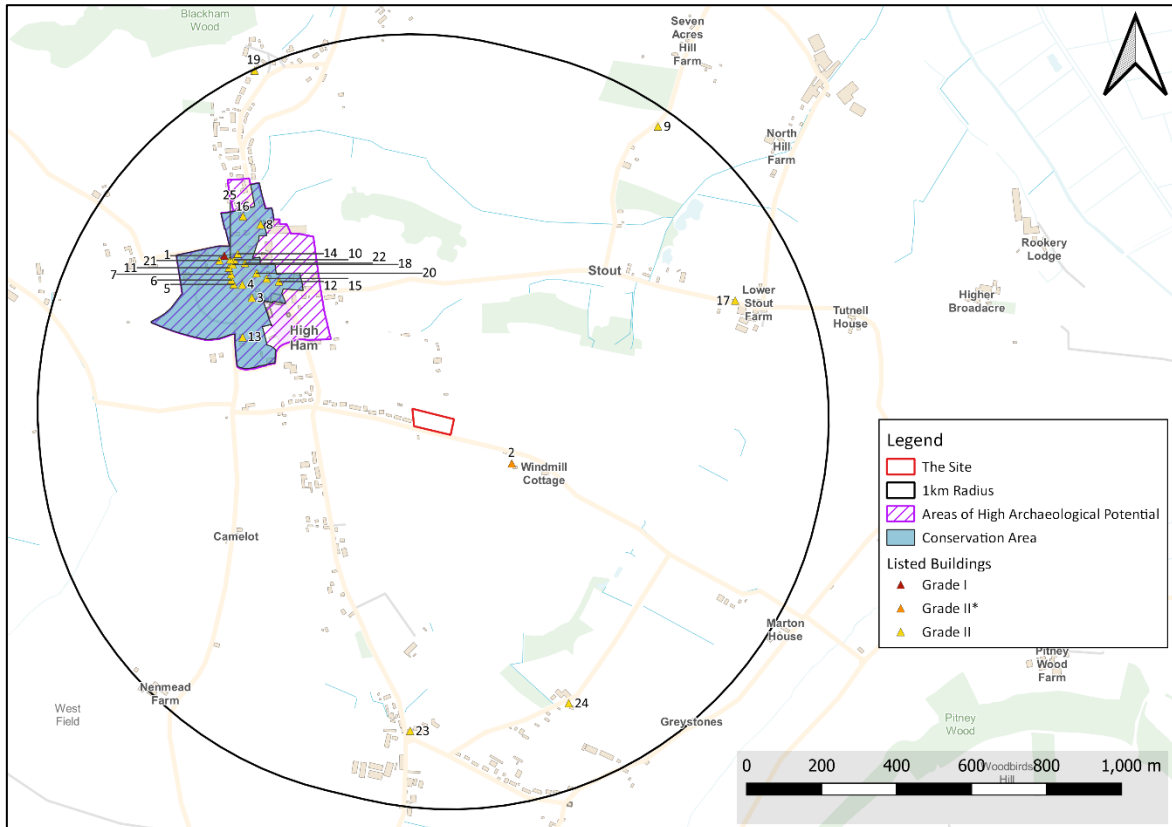


FIGURE 9: DESIGNATED HERITAGE ASSETS WITHIN 1KM OF THE PROPOSAL AREA RECORDED IN THE NATIONAL HERITAGE LIST FOR ENGLAND (NHL) © HISTORIC ENGLAND 2022. CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2022. THE HISTORIC ENGLAND GIS DATA CONTAINED IN THIS MATERIAL WAS OBTAINED ON 19.07.2022. THE MOST PUBLICLY AVAILABLE UP TO DATE HISTORIC ENGLAND GIS DATA CAN BE OBTAINED FROM [HTTP://HISTORICENGLAND.ORG.UK](http://historicengland.org.uk).

TABLE 3: DETAILS OF DESIGNATED HERITAGE ASSETS SHOWN IN FIGURE 8 (HE)

No	List Entry	Name	Grade
1	1227591	Church of Saint Andrew	I
2	1235260	Stembridge Mill	II*
3	1056621	The Old Rectory	II
4	1056622	Gateway 30 Metres North of the Old Rectory	II
5	1056623	Dobyns	II
6	1056624	Cottage-On-The-Green	II
7	1056625	Wheelwrights Cottage	II
8	1056629	Manor Farmhouse	II
9	1056660	Rosemary Cottage	II
10	1056661	Unidentified Monument in Churchyard 3 Metres South of Chancel, Church of Saint Andrew	II
11	1056662	Portion of East Boundary Wall to Ham Court, 15 Metres South of Church of Saint Andrew	II
12	1227498	Cottage 20 Metres East of Hillbourne	II
13	1227562	South End House, and Front Boundary Wall	II
14	1227621	Swain Travers Monument in Churchyard, 9 Metres East of Chancel, Church of Saint Andrew	II
15	1227721	Hillbourne	II
16	1235115	The Grange	II
17	1235136	Fir Tree Farmhouse, and Mounting Block 6 Metres West	II
18	1265265	Portion Of South Boundary Wall with Railings, 15 Metres South of Church of Saint Andrew	II
19	1346056	Fountain House	II

20	1346057	Laburnum House	II
21	1346058	Gillet Monument in Churchyard, 17 Metres South West of Tower, Church of Saint Andrew	II
22	1346077	School House	II
23	1407282	Yew Tree Farmhouse	II
24	1421814	Rose Cottage	II
25	1424764	High Ham War Memorial	II

### 3.2 AERIAL PHOTOGRAPHY

A review of readily available aerial photographs shows the site in 2014, with some evidence for a north-south division to the east of the site and a north-west to south-east division running through the centre of the site. These may have been temporary field divisions (Figure 10). A 2020 aerial photograph (Figure 11) shows some ground disturbance, possibly caused by the siting of animal feeders within the site area.



FIGURE 10: AERIAL PHOTO OF THE SITE FROM 2014; ©2022 INFOTERRA LTD & BLUESKY.



FIGURE 11: AERIAL PHOTOGRAPH FROM 2020 ©2022 GOOGLE.

LiDAR data is available at a survey interval of 1m for the site and surrounding area. While a 25cm interval is preferable for the identification of archaeological features, especially within woodland, a 1m resolution can be used, particularly for identifying larger archaeological features. The LiDAR data is a 2020 data set. LiDAR Digital Surface Model (DSM) (Figure 12) and Digital Terrain Model (DTM) data has been processed and examined. Both data sets show no evident archaeological features, although it is likely that the ground within the site has been intensively ploughed over recent decades, which would likely remove any evidence of surface features. There is no evidence for the north-south oriented field boundary removed by the late 19<sup>th</sup> century suggesting no surface expression of this feature survives, although below ground remains are possible.



FIGURE 12: 1M LIDAR DSM FIRST RETURN DATA. PROCESSED USING QGIS 3.22 AND RVT MULTIHILLSHADE 315\_35\_2. CONTAINS ENVIRONMENT AGENCY DATA USED UNDER THE OPEN GOVERNMENT LICENSE 3.0.

### 3.3 WALKOVER SURVEY

A walkover survey of the site was undertaken on the 7<sup>th</sup> of November 2022 in overcast but dry conditions. The site forms part of a larger agricultural field, with the land currently used as pasture. The field slopes from north to south with low hedged boundaries. Access into the Site was from a field gate in the south-west corner of the field. There were no evident earthworks, although slight vehicle wear/tracking was evident in the gateway, orientated to the north-east towards a field gate roughly central to the northern field boundary.

Views towards the GII\* Listed Stembridge Tower Windmill were confirmed from site, but no views of the Church or conservation area were possible.

### 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 site may have the potential to encounter buried archaeological remains relating to buildings, structures or boundaries previously located within the proposed development area. Historic mapping suggests the site has been utilised as an enclosed agricultural fields in the past two

centuries and appears to have been intensively ploughed. The archaeological potential of the site is unknown. Damage to archaeological deposits would be considered **permanent/irreversible**. Mitigation could be managed through a planning condition for archaeological monitoring and recording during groundworks.

TABLE 4: SUMMARY OF DIRECT IMPACTS.

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



## 4.0 INDIRECT IMPACTS

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### 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*<sup>1</sup>. The aim of this assessment is to identify the designated heritage assets outside the redline boundary that might be impacted upon by the proposed development, determine if an effect on their significance via setting is possible, and establish the level of impact. The staged approach advocated by GPA3 contains the following steps<sup>2</sup>:

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

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

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

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

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

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

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

## 4.2 QUANTIFICATION

A 1km radius has been considered suitable for the assessment of any likely impacts upon heritage assets as a result of the proposed development. There are 26 Listed Buildings (1 Grade I and 1 Grade II\*) within 1km of the site. With the exception of the Grade II\* listed Stembridge Mill, all were scoped out of the assessment following the site visit due to the screening effects of topography and extant developments.

The only assets selected for assessment were Stembridge Mill (GII\*), with the High Ham Conservation Area and St Andrews Church (GI) both visited and assessed during the fieldwork but considered unlikely to suffer any measurable level of impact or harm.

Based on perceived value and location relative to the site, Stembridge Tower Mill has been treated as a *Category #1* assets and the Church of St Andrew and Conservation Area along with all other assets within 1km of the Site have been treated as a *Category #3* assets. 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: Stembridge Tower Mill
- Category #2 assets: None
- Category #3 assets: Church of St Andrew, High Ham Conservation Area, and all other Listed Buildings within 1km of the site

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

### 4.3 IMPACT BY CLASS OF MONUMENT OR STRUCTURE

#### 4.3.1 INDUSTRIAL BUILDINGS AND INFRASTRUCTURE

*A range of industrial and extractive structures, often exhibiting elements of formal planning, rarely with a view to aesthetics*

A whole range of structures relating to a whole range of industries falls under this broad category, and include ruined, standing and functioning buildings. This might include: bridges, canals, capstans, clay-drying facilities, engine houses, fish cellars, gunpowder mills, railways, warehouses and so forth. However, in most instances industrial buildings were not built with aesthetics in mind, despite the elements of formal planning that would often be present. The sensitivity of these structures to the visual intrusion of a wind turbine depends on type, age and location.

It is usually the abandoned and ruined structures, now overgrown and ‘wild’, that are most sensitive to intrusive new visual elements; wind turbines in the immediate vicinity could compete for attention.

#### **What is important and why**

This is a very heterogeneous group, though all buildings and associated structures retain some evidential value, which ranges with the degree of preservation. Some structures are iconic (e.g. Luxulyan viaduct) and quite often others are, due to the rapid intensification of industry in the 18<sup>th</sup> and 19<sup>th</sup> centuries, innovative in both design and application (historical/illustrative). Some may survive as working examples – in which case the associational value is maintained – but many are ruinous or converted (historical/associational). All were designed, and many conform to a particular template (e.g. engine houses) although incremental development through use-life and subsequent decrepitude may conceal this. Fortuitous development may then lead to ruinous or deserted structures or building complexes taking on the air of a romantic ruin (e.g. Kennall Vale gunpowder works), imagery quite at odds with the bustle and industry of their former function.

<b>Asset Name:</b> Stembridge Tower Windmill	
<i>Parish:</i> High Ham	<i>Value:</i> High
<i>Designation:</i> GII*	<i>Distance to Development:</i> c.100m
<p><i>Summary: Windmill. 1822. Local lias stone roughly coursed; shaped thatched roof with plain gable over weatherboarded superstructure; wood sail frames. Circular plan. On north side, boarded door in heavy frame, up 4 steps, with a lower door in east face and a smaller door on south face; small casement windows on east side. Former bakery building to rear. Inside, four floors, and incomplete gear which once drove two pairs of stones: fireplace in lowest floor, the flue carried in wall to an outlet just below the cap. The mill stopped working by wind in 1897, and steam power was introduced; the drive shaft and gears are still in place; the French stones have balance weight pockets let into plaster backs, patented by Clark and Dunham in 1859. On the meal floor, below the stone floor, is a wire machine for dressing flour. The only surviving windmill in Somerset, it is the only thatched mill left in England. Acquired by National Trust in 1969, partly restored by them, further work in hand October 1984 (Watts, M: Somerset Windmills, Agraphicus, 1975; Couthard A J and Watts M, Windmills of Somerset and the men who worked them, - 1978). Further restoration works are currently occurring on site.</i></p>	
<p><i>Conservation Value:</i> An aesthetically pleasing and now unique structure. It has a historical illustrative value in the narrative of the continuation of agricultural practice in this area throughout the medieval and post medieval periods. It holds evidential value in its structure regarding its construction. It is likely to hold some communal value as a significant and relatively unique feature within this landscape. Despite being a relatively isolated and tall structure, the windmill has little wider landscape presence, although perhaps if fully restored and functioning in the future, the visual prominence will be significantly increased.</p>	

*Authenticity and Integrity:* The windmill has been restored under the ownership of the National Trust and represents the only remaining thatched windmill in England. It incorporates some elements of the earlier Ham Mill which it replaced. It is currently not open to the public for conservation reasons.

*Contribution of Setting to the Significance of the Asset:* The site of the windmill was clearly chosen to enable it to function correctly and is located in relatively proximity to the site of the windmill it replaced (just to the north). Its proximity to the settlement at High Ham is also likely to have been a consideration. It was constructed outside the settlement, on an accessible road but surrounded by agricultural fields. The road on which it sits has clearly been renamed after it, having been known as Eastbridge and then Stembridge Road at the end of the 19<sup>th</sup> and beginning of the 20<sup>th</sup> centuries. Some modern development has encroached from High Ham to the west of the Windmill however this is small in scale and still at a distance from the mill, meaning that it retains a slightly divorced, isolated setting. Whilst its significance as a heritage asset is not solely derived from this, the retention of its original setting being slightly divorced from the village does contribute to the understanding and appreciation of its significance.

*Magnitude of Effect:* The proposed development, although small in scale represents a continuation of residential encroachment towards the windmill and its isolated rural setting from the west. There is the potential that well considered planting and use of materials could in time provide screening of views of the development from the mill; however there would still be an impact upon the approach to the mill from this direction which is likely to lose some of its rural character. The operational phase would likely see an increase in traffic volume using the stretch of road on which the mill lies, potentially impacting on the appreciation of its setting and significance, although this is likely to be slight due to the low number of dwellings. There are potential aural and visual impacts on the mill as a result of constructional phase impacts although these would be temporary. Magnitude of effect is considered minor adverse

*Magnitude of Impact:* High value asset and minor change = moderate/slight

*Overall Impact Assessment:* Slight Adverse



FIGURE 13: STEMBRIDGE TOWER WINDMILL. THE WHITE PAINTED HOUSE AT THE END OF THE CURRENT LIMITS OF THE SETTLEMENT ON WINDMILL ROAD IS ARROWED; VIEWED FROM THE WEST.

#### 4.3.2 AGGREGATE IMPACT

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

Based on the restricted number of assets where any appreciable effect is likely, the aggregate impact of this development is **negligible** and significance of effects is **Neutral/Slight**. 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.

#### 4.3.3 CUMULATIVE IMPACT

*Cumulative impacts affecting the setting of a heritage asset can derive from the combination of different environmental impacts (such as visual intrusion, noise, dust and vibration) arising from a single development or from the overall effect of a series of discrete developments. In the latter case, the cumulative visual impact may be the result of different developments within a single view, the effect of developments seen when looking in different directions from a single viewpoint, of the sequential viewing of several developments when moving through the setting of one or more heritage assets.*

The Setting of Heritage Assets 2011a, 25

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

GLVIA 2013, 123

An assessment of cumulative impact is, however, very difficult to gauge, as it must take into account existing, consented and proposed developments. The threshold of acceptability has not, however, been established, and landscape capacity would inevitably vary according to landscape character. Whilst very few developments are currently known to be proposed in the immediate area, it is noted that land to the south of the Site, has a sign indicated it has recently been sold, and that further development land is sought. The cumulative impact of this development can currently only be considered **slight adverse** as there is limited 'known' proposed developments.

#### 4.3.4 HISTORIC LANDSCAPE

The proposed development lies within agricultural land on the south-west edge of High Ham. Its historic landscape setting comprised a mostly rural landscape. Part of this historic landscape setting has been eroded through 20<sup>th</sup> century housing to the west, but it stands in a broadly open rural landscape. The loss of this element of the historic landscape could be considered **Slight**.

TABLE 5: SUMMARY OF IMPACTS AND EFFECTS

Asset	Type	Distance	Value	Scale of Change	Significance of Effect	Magnitude of Impact
Indirect Impacts						
St. Andrews Church	GI	450m	Very High	Neutral	No Change	Neutral
Stembridge Tower Windmill	GI*	100m	High	Slight	Moderate/Slight	Slight Adverse
High Ham Conservation Area	CA	390m	High	Neutral	No Change	Neutral
Landscape Character						
Historic Landscape	n/a	n/a			Minor	Slight Adverse
Aggregate Impact	n/a	n/a			Negligible	Slight Adverse
Cumulative Impact	n/a	n/a			Negligible	Neutral/Slight Adverse

#### 4.3.5 RECOMMENDATIONS AND MITIGATION

It is recommended that any proposals to develop this site for residential use are more sympathetic materials and colour palette than the white painted render of some of the existing dwellings currently located on the edge of the village. The proposed development may help screen and soften these houses from the Windmill.

Any development should be sensitive to the proximity of the Stembridge Tower Windmill and its setting and its location. This should include the use of appropriate vernacular materials and designs which integrate the development with the surrounding village and do not jar or stand out against the historic housing stock.

## 5.0 CONCLUSIONS

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The site lies to the south east of High Ham, which was recorded along with Low Ham as a manor at Domesday, held by the Abbey of St Mary, Glastonbury, who had also held it before Domesday. At the dissolution the manor was granted to Sir John Grey and passed through his family until it was sold in 1629 to Thomas Bennet and John Rolle. The Rolle successors sold the manor, probably before 1764 to John Galton, and it passed to his younger brother Samuel (VCH 2004). The tithe apportionment of 1838 shows the majority of the site area was owned by Samuel Tertius Galton, with the eastern extent in the ownership of William Gare. The manor house and land was sold by Francis Galton in 1854 although the Galton family retained some land in the parish until at least 1896 (VCH 2004). William Gare, the other landowner associated with part of the site appears to have been a farmer, resident at Low Ham.

The proposed development would see the construction of 6 houses on part of one agricultural field to the north of Windmill Road. Continuing the linear nature of development along this road, and the pattern of development almost entirely being on the northern side of this lane.

The indirect impacts on nearby designated heritage assets, namely the Grade II\* Listed windmill are considered slight 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.

The overall impact of the proposed development can be assessed as **slight adverse** and therefore **less than substantial harm**, so the slight harm in this instance will be considered outweighed by the public benefits of this proposed scheme. The impact of the development on any buried archaeological resource will be **permanent** but can be mitigated if deemed appropriate by the planning authority through a standard archaeological monitoring and recording planning condition.

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APPENDIX 1: SUPPORTING PHOTOGRAPHS - WALKOVER SURVEY



1. ST ANDREWS CHURCH, HIGH HAM; VIEWED FROM THE SOUTH.



2. STEMBRIDGE TOWER WINDMILL, VIEWED FROM THE WEST.



3. THE SITE VIEWED FROM LONG STREET FARM. STEMBRIDGE TOWER WINDMILL IS ARROWED, VIEWED FROM THE SOUTH-WEST.

## APPENDIX 2: IMPACT ASSESSMENT METHODOLOGY

### Heritage Impact Assessment - Overview

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

### National Policy

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

#### Paragraph 194

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

#### Paragraph 195

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

A further key document is the Planning (Listed Buildings and Conservation Areas) Act 1990<sup>5</sup>, in particular section 66(1), which provides *statutory protection* to the setting of Listed buildings:

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

In addition, the Ancient Monuments and Archaeological Areas Act 1979<sup>6</sup>, the Protection of Wrecks Act 1973<sup>7</sup>, and the Historic Buildings and Ancient Monuments Act 1953<sup>8</sup> also contain relevant statutory provisions.

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

### Development within a Historic Environment

Any development within a historic environment has the potential for both *direct* and *indirect* impacts. Direct impacts can be characterised as the physical effect the development may have on heritage assets within, or immediately adjacent to, the redline boundary. These impacts are almost always adverse, i.e. they represent the disturbance or destruction of archaeological features and deposits within the footprint of the Scheme. Indirect impacts can be characterised as the way the development affects the visual, aural, and experiential qualities (i.e. setting) of a

<sup>4</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf).

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

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

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

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

designated heritage asset in the wider area, where the significance of that asset is at least partly derived from those qualities. These impacts can be adverse, beneficial, or neutral.

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

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

### Significance in Decision-Making

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

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

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

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

For designated heritage assets, which have been designated *because* they are deemed significant, Step 1 is relatively straightforward, and Step 2 is also, to a degree quantified, as the determination of significance, to a greater or lesser extent, took place then the heritage asset was designated<sup>11</sup>. For undesignated heritage of assets comparable value, or for archaeological sites that may have not been investigated (or were unknown or poorly understood prior to identification), a staged process of assessment is required (below).

Once an assessment of value and significance has been made, either by reference to designation or comparable importance if undesignated, the significance of the effect (TABLE 8) and magnitude of the impact (TABLE 9) can be determined. The former is logical and objective, the latter is a more nuanced but subjective, and the accompanying discussion provides the more narrative but subjective approach advocated by Historic England. This is a useful balance between rigid logic and nebulous subjectivity (e.g. the significance of effect on a Grade II Listed building can never be greater than moderate/large; an impact of substantial adverse is almost never achieved). This is in adherence with GPA3<sup>12</sup>.

In the NPPF, adverse impact is divided into the categories: *total loss*, *substantial harm*, and *less than substantial harm*. The bar for substantial harm was set at a very high level in 2013 by the case *Bedford BC v SSCLG38*. However,

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

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

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

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

following a recent High Court action<sup>13</sup> it is possible a *major adverse impact* may now qualify as a *substantial harm*. Any lesser adverse impact will constitute a *less than substantial harm*. TABLE 10 shows how this report correlates the two systems.

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

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

In addition, and as PPG states<sup>17</sup>: *The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.*

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

### Value and Importance

While every heritage asset, designated or otherwise, has some intrinsic merit, the act of designation creates a hierarchy of importance that is reflected by the weight afforded to their preservation and enhancement within the planning system. The system is far from perfect, impaired by an imperfect understanding of individual heritage assets, but the value system that has evolved does provide a useful guide to the *relative* importance of heritage assets. Provision is also made for heritage assets where value is not recognised through designation (e.g. undesignated ‘monuments of Schedulable quality and importance’ should be regarded as being of *high* value); equally, there are designated monuments and structures of *low* relative merit. TABLE 6: THE HIERARCHY OF VALUE/IMPORTANCE (BASED ON THE DMRB LA104 2020 TABLE 3.2N). TABLE 6 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 6: THE HIERARCHY OF VALUE/IMPORTANCE (BASED ON THE DMRB LA104 2020 TABLE 3.2N).

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

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

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

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

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

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

TABLE 7: 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 8: 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 9: 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 10: SCALES OF IMPACT AS PER THE NPPF, RELATED TO TABLE 9.

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

### Staged Investigation – Direct Impact

The staged approach for the assessment of direct impacts references the publication *Significance in Decision-Taking in the Historic Environment*<sup>18</sup>. The aim of this assessment is to establish the *archaeological baseline* for the site and determine the likely significance of the archaeological resource. This staged approach starts with desk-based assessment<sup>19</sup>, may conclude with intrusive investigations, and may reference some or all of the following:

1. Documentary research (published works, primary and secondary sources in record offices).
2. Existing archaeological reports or surveys for the site.
3. Historic maps.
4. Archaeological research (historic environment records (HER), event records (HER), Historic England National List; Portable Antiquity Scheme (PLS) records, grey literature reports (available from the Archaeological Data Service).
5. Historic Landscape Characterisation (HLC).
6. Aerial photography (National Mapping Programme, historic aerial photographs (Historic England, Cambridge, Britain from Above), recent commercial photography (Google Earth)).
7. LiDAR analysis (Environment Agency data, TELLUS data).
8. Oral testimony.
9. Walkover survey (or for historic buildings, a historic building appraisal<sup>20</sup>).
10. Geophysical survey, if suitable (magnetometry, electrical resistance, ground-penetrating radar)<sup>21</sup>.

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

<sup>19</sup> Cifa 2014 updated 2020: *Standard and guidance for historic environment desk-based assessment*.

<sup>20</sup> Historic England 2016: *Understanding Historic Buildings: A Guide to Good Recording Practice*.

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

## 11. Archaeological trench evaluation<sup>22</sup>, if appropriate.

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

### Type of Impact

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

### Staged Investigation – Indirect Impact

The staged approach for the assessment of indirect impacts references the *Setting of Heritage Assets*<sup>23</sup>. The aim of this assessment is to identify the designated heritage assets outside the redline boundary that might be impacted upon by the proposed development, determine if an effect on their significance via setting is possible, and establish the level of impact. The staged approach advocated by GPA3 contains the following steps<sup>24</sup>:

/

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

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

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

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

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

*Step 4* is possible where the required information is available from the developer/client/agent, and where design is an iterative process rather than *fait accompli*. In many instances, adverse outcomes (and more rarely, beneficial

<sup>22</sup> Cifa 2014 updated 2020: *Standard and guidance for archaeological field evaluation*.

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

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



outcomes) are unavoidable, as mitigation would have to take place at the heritage asset concerned or within an intervening space, and not the proposed site itself.

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

As discussed (elsewhere, this document), the critical assessment is to determine the contribution of setting to the significance of the heritage asset, and/or the ability of the setting to facilitate an appreciation of that significance. Views are important but not paramount, and views to and from a proposed development can exist without adverse effect. Some assets are intrinsically more sensitive to change in their environment than others; a useful shorthand for this can be found in TABLE 11.

TABLE 11: IMPORTANCE OF SETTING TO INTRINSIC SIGNIFICANCE.

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

### Type of Impact

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

#### Construction Phase

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

#### Operational Phase

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

#### Decommissioning Phase

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

### Group Assessment

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

#### Cumulative Impact

A single development will have a direct physical and an indirect visual impact, but a second and a third site in the same area will have a synergistic and cumulative impact above and beyond that of a single site. PPG states<sup>26</sup>: *When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to*

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

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

*consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.*

*GPA3 states<sup>27</sup>: Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it.*

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

#### *Aggregate Impact*

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

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

## Definitions

### Heritage Assets

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

### Significance

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

### Conservation Principles

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

#### Evidential Value

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

#### Historical Value

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

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

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

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

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

#### Aesthetic Value

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

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

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

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

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

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

#### *Communal Value*

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

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

#### *Significance in the NPPF*

The NPPF operates on a slightly differently set of criteria to the Conservation Principles, a divergent trajectory that will doubtless be addressed when the Conservation Principles are revised. Under the NPPF, value is expressed as *archaeological interest*, *architectural and artistic interest*, and *historic interest*. The following is taken from the NPPF PPG<sup>31</sup> document, followed by commentary:

#### *Archaeological Interest*

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

#### *Architectural and Artistic Interest*

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

#### *Historic Interest*

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

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

## Concepts from World Heritage Guidance

World Heritage Sites are assessed with reference to their own, non-statutory, guidance<sup>32</sup>. This includes the useful concepts of *authenticity* and *integrity*<sup>33</sup>:

### Authenticity

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

### Integrity

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

## Designated Heritage Assets

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

### Listed Buildings

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

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

Buildings are split into various levels of significance: Grade I (2.5% of the total) representing buildings of exceptional (international) interest; Grade II\* (5.5% of the total) representing buildings of particular (national) importance; Grade II (92%) buildings are of merit and are by far the most widespread. Inevitably, accuracy of the Listing for

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

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

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

individual structures varies, particularly for Grade II structures; for instance, it is not always clear why some 19<sup>th</sup> century farmhouses are Listed while others are not, and differences may only reflect local government boundaries, policies and individuals.

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

### *Conservation Areas*

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

### *Scheduled Monuments*

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

### *Registered Parks and Gardens*

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

### *Registered Battlefields*

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

### *World Heritage Sites*

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

### *Setting*

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

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

The principal guidance on this topic is contained within one publication: *The Setting of Heritage Assets: Good Practice Advice* <sup>36</sup>. Where the impact of a proposed development is largely indirect, the importance of the setting to the significance of the heritage asset becomes the primary consideration of the impact assessment. The following extracts are from GPA3<sup>37</sup>:

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

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

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

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

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

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

However, as stated in PPG<sup>40</sup>: *Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.*

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

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

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

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

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

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

Furthermore, as stated in GPA3<sup>41</sup>: *Similarly, setting is different from general amenity. Views out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting.*

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

In addition, visibility alone is no clear guide to visual impact. People perceive size, shape and distance using many cues, so context is critically important. For instance, research on electricity pylons<sup>42</sup> has indicated scenic impact is influenced by landscape complexity: the visual impact of pylons is less pronounced within complex scenes, especially at longer distances, presumably because they are less of a focal point and the attention of the observer is diverted. There are many qualifiers that serve to increase or decrease the visual impact of a proposed development, some of which are seasonal or weather-related.

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

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

#### *Curtilage*

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

#### *Historic Character*

*The historic character of a place is the group of qualities derived from its past uses that make it distinctive. This may include: its associations with people, now and through time; its visual aspects; and the features, materials, and spaces associated with its history, including its original configuration and subsequent losses and changes. Character is a broad concept, often used in relation to entire historic areas and landscapes, to which heritage assets and their settings may contribute.* The concept of character area<sup>44</sup> can be relevant to developments where extensive areas designations (Registered Parks and Gardens, Registered Battlefields, Conservation Areas, and World Heritage Sites; also towns and larger villages) are divisible into distinct character areas that a development may impact differently due to proximity, visibility etc.

#### *Context*

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

#### *Landscape Context*

The determination of *landscape context* is an important part of the assessment process. This is the physical space within which any given heritage asset is perceived and experienced. The experience of this physical space is related

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

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

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

<sup>44</sup> Historic England 2017: *Understanding Place: Historic Area Assessments*.



to the scale of the landform and modified by cultural and biological factors like field boundaries, settlements, trees, and woodland. Together, these contribute to local character and extent of the setting.

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

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

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

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

On a landscape scale views, taken in the broadest sense, are possible from anywhere to anything, and each may be accorded an aesthetic value according to subjective taste (this is the *amenity value* of views<sup>45</sup>). Given that terrain, the biological and built environment, and public access restrict our theoretical ability to see anything from anywhere, in this assessment the term *principal view* is employed to denote both the deliberate views created within designed landscapes, and those fortuitous views that may be considered of aesthetic value and worth preserving, where they contribute to significance.

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

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

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

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

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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