

LAND OFF CHURCH HILL

PINHOE

EXETER

DEVON

ARCHAEOLOGICAL ASSESSMENT



South West Archaeology Ltd. report no. 221104



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Land off Church Hill, Pinhoe, Exeter, Devon Archaeological Assessment

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Work undertaken by SWARCH for Verto Homes (The Client)

SUMMARY

South West Archaeology Ltd. was commissioned to produce an archaeological assessment for land off Church Hill, Pinhoe, Exeter, Devon. This work was undertaken for Verto Homes (the Client) to assess the potential for the survival of archaeological deposits and or any other heritage constraints prior to an application for the development of the land.

The Site lies in the former landholding of the Hill, part of the lands of the Poltimore Estate since at least the early 19th century. The Site was located close to the centre of the holding with Hill View Cottages located on the Site of the former farmhouse, and a group of outbuildings formerly located to the South of the Site in 1840. In the early to Mid-20th century the Site became subdivided from a larger field, and may have formed part of a market garden, with the three new plots all terraced into the slope. The Site has since been landscaped further with a modern track and yard built in the southern part of the site.

The proposals for a residential development on the Site are unlikely to significantly impact any below ground archaeology, as it is considered very unlikely that anything will have survived 20th and 21st century works on the Site. In terms of impact the Grade II Listed Church of St Michael and All Angels is very sensitive to further changes to its setting and whilst the proposals will further encroach upon this setting any harm is largely as part of the cumulative impact of developments in Pinhoe. The Church will retain its rural setting and character, and the proposed use of bungalows on the upper parts of the Site will minimise the impact of the development on heritage assets and the wider landscape.*



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1.0 INTRODUCTION

LOCATION:	LAND OFF CHURCH HILL, PINHOE
PARISH:	EXETER
DISTRICT:	EXETER
COUNTY:	DEVON
NGR:	SX 95852 94900
PLANNING APPLICATION:	PRE-APPLICATION
SWARCH REF:	EPP22

1.1 PROJECT BACKGROUND

South West Archaeology Ltd. (SWARCH) was commissioned by Verto Homes (the Client) on behalf of a private client (the Client) to undertake an archaeological assessment for the land off Church Hill, Pinhoe, Exeter, Devon. This work was undertaken ahead of an application for the residential development of the site, and to place the site in its historical and archaeological context and to assess the nature and extent of any heritage constraints.

1.2 SITE LOCATION AND TOPOGRAPHY

The site runs adjacent to the road named Church Hill, to the north of Pinhoe. The site is currently made up of agricultural enclosures within a small remaining pocket of agricultural land with various houses and modern residential developments not surrounding. Almost all of the land to the south and east has or is in the process of being developed, with the Site to the south-east, being built by Verto Homes. The site lies at a height of c.85m AOD. The soils on the site are the well-drained sandy and coarse loamy soils over soft sandstone of the Bridgenorth Association (SSEW 1983), which overlie the mudstone and sandstone of the Crackington Formation (BGS 2022).

1.3 HISTORICAL & ARCHAEOLOGICAL BACKGROUND

The site lies in the historic parish of Pinhoe, now a suburb of the city of Exeter, in the historic hundred of Wonford and the deanery of Aylesbeare. In 1001, King Ethelred's army was defeated in battle at Pinhoe by the Danes, who burned Pinhoe, Broadclyst (*Broad Clist*) and other neighbouring villages (Lysons 1822). In Domesday, Pinhoe (*Pinnoch*) was held by Earl Leofwine and the church with some land by Battle Abbey (Morris 1992). The manor of Pinhoe, following a period as royal demesne, belonged to Robert de Vallibus, or *de Vaux* during the reign of Henry III. The heiress of de Vallibus brought it to the Muttons, whose heiress took it to the Stretch family, through which it passed to the Cheney and Walgrave families. In the late 16th/early 17th century, it was noted by Sir William Pole as having been sold piecemeal. By the 19th century the majority of the estate about the site was held by Lord Poltimore (the Bampfylde family).

The site is part of an area recorded on the Devon Historic Landscape Characterisation (HLC) as Modern: *Areas set aside for recreation including sports fields and stadiums, golf courses, fishing lakes, campsites*, although this is surrounded by an area of post-medieval enclosure: *Enclosures of a post-medieval date. Fields laid out in the C18th and C19th commonly have many surveyed dead-straight field boundaries*. Immediately to the west of the site, the Devon HER records probable post-medieval to modern orchard banks identified on aerial photography (MDV113602). To the east, across the road, geophysical survey undertaken in 2013 (Kendall 2013) identified a number of anomalies that included in-filled ditches, curving parallel linear anomalies indicative of ridge and furrow, and a circular anomaly which may be geological. It does not appear that any further investigative work was undertaken. Further orchard banks were recorded to the south of the site

(MDV113604) and geophysical survey was taken on a site to the south-west, which identified a low potential for the survival of archaeological deposits (Bampton 2019).

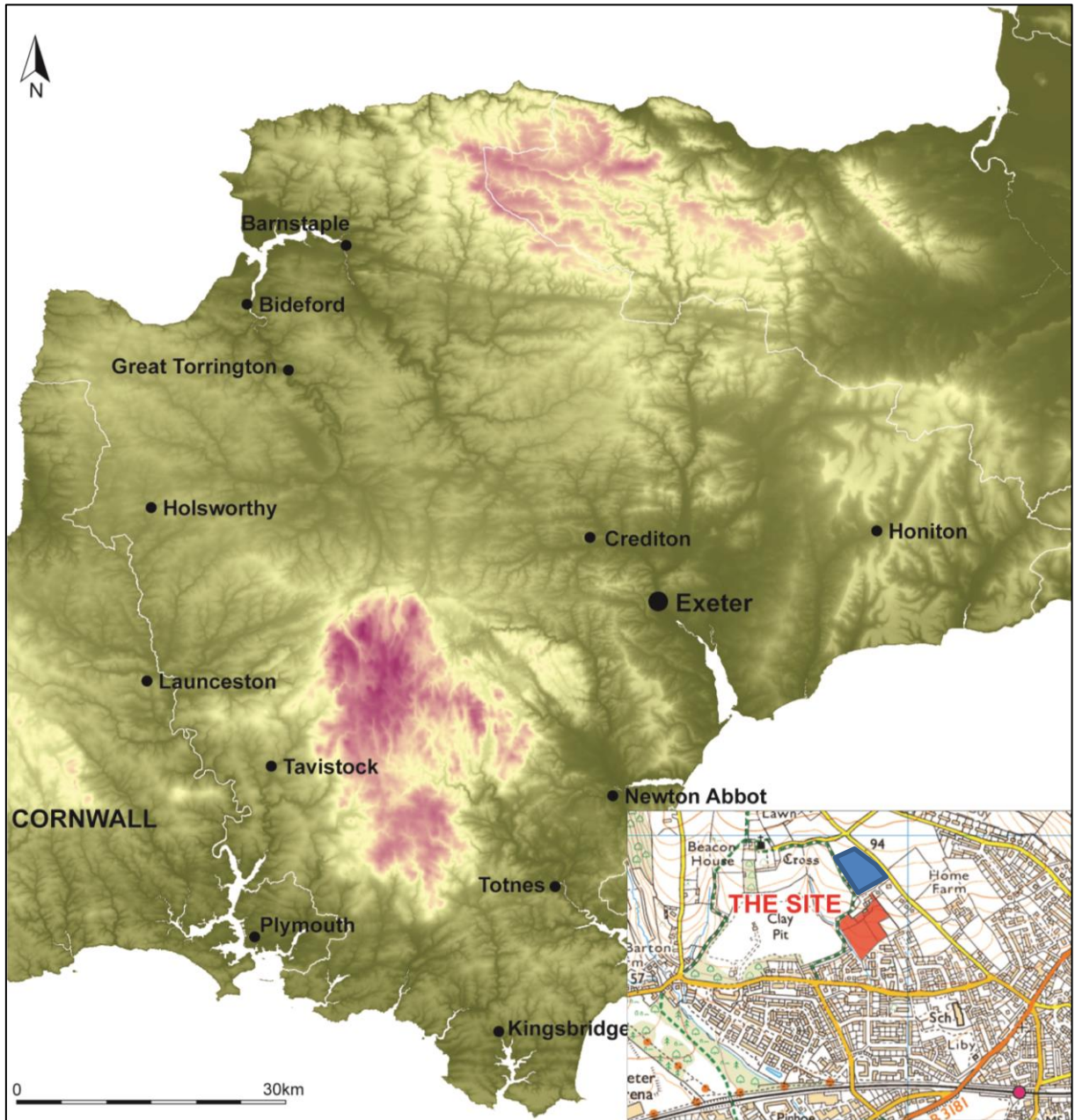


FIGURE 1: LOCATION MAP, THE SITE IS SHOWN IN BLUE, VERTO HOMES IS CURRENTLY DEVELOPING THE AREA SHOWN IN RED.

1.4 METHODOLOGY

The desk-based appraisal follows the guidance as outlined in: Standard and Guidance for Archaeological Desk-Based Assessment (CifA 2014 revised 2020) and Understanding Place: historic area assessments in a planning and development context (Historic England 2017). The historic visual impact assessment follows the guidance outlined in: Conservation Principles: policies and guidance for the sustainable management of the historic environment (English Heritage 2008), The Setting of Heritage Assets (Historic England 2015), Seeing History in the View (English Heritage 2011b), Managing Change in the Historic Environment: Setting (Historic Scotland 2010), and with reference to Visual Assessment of Wind farms: Best Practice (University of

Newcastle 2002), Guidelines for Landscape and Visual Impact Assessment 3rd edition (Landscape Institute 2013), Photography and Photomontage in Landscape and Visual Impact Assessment (Landscape Institute 2011). The assessment also follows the guidance outlined in the Principles of Cultural Heritage Impact Assessment in the UK produced by ClfA, IHBC and IEMA in July 2021.

2.0 HERITAGE IMPACT ASSESSMENT

2.1 HERITAGE IMPACT ASSESSMENT – OVERVIEW

The purpose of heritage impact assessment is twofold: Firstly, to understand – insofar as is reasonably practicable and in proportion to the importance of the asset – the significance of a historic building, complex, area, monument, or archaeological site (the ‘heritage asset’). Secondly, to assess the likely effect of a proposed development on the heritage asset (direct impact) and/or its setting (indirect impact). This methodology employed in this assessment is based on the approach outlined in the relevant DoT guidance (DMRB vol.11; WEBTAG), used in conjunction with the ICOMOS (2011) guidance and the staged approach advocated in The Setting of Heritage Assets (GPA3 Historic England 2015). The methodology employed in this assessment can be found in Appendix 1.

2.2 NATIONAL POLICY

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

Paragraph 189

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

Paragraph 194

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

Paragraph 195

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

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

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

2.3 LOCAL POLICY

Objective 8 of the Exeter City Council Local Plan Core Strategy states:

Protect and enhance the city's unique historic character and townscape, its archaeological heritage, its natural setting that is provided by the valley parks and the hills to the north and west, and its biodiversity and geological assets.

Policy CP4 reads:

Residential development should achieve the highest appropriate density compatible with the protection of heritage assets, local amenities, the character and quality of the local environment and the safety and convenience of the local and trunk road network.

2.4 THE DEVELOPMENT PROPOSALS

The proposed development is for a residential development of the Site. The proposal includes for the construction of bungalows to the northern (upper) parts of the Site.

3.0 DIRECT IMPACTS

3.1 METHODOLOGY

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 3.1-3.3 examine the documentary, cartographic and archaeological background to the site. Section 3.4 summarises this information in order to determine the significance of the archaeology, the potential for harm, and outlines mitigation strategies as appropriate. Appendix 1 details the methodology employed to make this judgement.

3.2 DOCUMENTARY SOURCES

The derivation of the place name 'Pinhoe' is uncertain. Appearing as *Peon Hó* and *Pinnoch* in the 11th century; it may be derived from the Old English *pennuc* meaning 'small penn', pin meaning 'pin or peg', a personal name, or *penn* meaning 'a hill/top/height' and *hōh* meaning 'hill spur'. Topographically, Pinhoe is on a prominent hill-spur making many of these options possible (Watts 2004).

Prior to its amalgamation into Exeter, Pinhoe was a parish in the hundred of Wonford and deanery of Aylesbeare (Lysons 1822). Lysons records a great battle between the Danes and King Ethelred's army at Pinhoe in 1001AD that resulted in the burning of Pinhoe among other villages and the slaughter of many in King Ethelred's army. In Domesday Pinhoe (*Pinnoch*) had 15 households and was worth £6 (Morris 1992). It was held by Earl Leofwine and the church with some land by Battle Abbey (Morris 1992). The parish church, the Church of St Michael is located in a relatively isolated position to the north of the settlement. In the 13th century the manor of Pinhoe belonged to Robert de Vallibus (or De Vaux) from whose heiresses and heirs it passed through the families of Multon, Strech, Cheney and Walgrave (Lysons 1822). In the 17th century the estate was largely sold piecemeal (Lysons 1822) and by the 19th century the majority of the estate about the site was held by Lord Poltimore (the Bampfylde family) (Tithe Apportionment). In the 1665 the Barton belonged to a William Kirkham, Esq. from whom it passed to the Elwills baronets and in 1822 it was owned by Mrs Freemantle (nee Elwills) (Lysons 1822). Lady Freemantle is also shown as the owner in the 1839 tithe records.

The site is part of an area recorded on the Devon Historic Landscape Characterisation (HLC) as Modern: *Areas set aside for recreation including sports fields and stadiums, golf courses, fishing lakes, campsites*, although this is surrounded by an area of post-medieval enclosure: *Enclosures of a post-medieval date. Fields laid out in the C18th and C19th commonly have many surveyed dead-straight field boundaries*. Immediately to the west of the site, the Devon HER records probable post-medieval to modern orchard banks identified on aerial photography (MDV113602). To the east, across the road, geophysical survey undertaken in 2013 (Kendall 2013) identified a number of anomalies that included in-filled ditches, curving parallel linear anomalies indicative of ridge and furrow, and a circular anomaly which may be geological. It does not appear that any further investigative work was undertaken. Further orchard banks were recorded to the south of the site (MDV113604) and geophysical survey was taken on a site to the south-west, which identified a low potential for the survival of archaeological deposits (Bampton 2019).

3.3 CARTOGRAPHIC SOURCES

The earliest map available to this study is the Surveyor's Draft Map of the Exeter Area of c.1801 (Figure 2). This map depicts the site as set within a landscape of relatively large and mostly straight sided fields. It would appear that there is a cluster of buildings to the south of the site, possibly overlapping the boundary, although there is not much detail on the map and the accuracy of these drafts means that they cannot be relied upon to be entirely accurate.



FIGURE 2: EXTRACT FROM THE 1801 SURVEYOR'S DRAFT MAP OF THE EXETER AREA; THE APPROXIMATE LOCATION OF THE SITE IS INDICATED (BL).



FIGURE 3: EXTRACT OF THE PINHOE TITHE MAP OF C.1840; GENEALOGIST. THE SITE IS INDICATED.

The Pinhoe Tithe Map of c.1840 (Figure 3) shows the site and the buildings to the south more clearly than the 1801 map. It would appear that there have been some divisions of the plots in the intervening years, particularly to provide a north-south row of small plots to the west of the site. The site forms plot 201 and part of 174, which are described on the Tithe Apportionment as *Three Acres* and *Four Acres* respectively; both descriptive names which give no indication of historic features within the plots. The land was owned by Lord Poltimore and occupied by John Turner as part of a relatively large landholding named *Hill Estate*. The buildings to the south of the site form part of the same landholding and are recorded as House, Court & Lane (218) and Garden (216). *Hill Estate* appears to have included a large proportion of orchard plots, with some arable and pasture. Plots 174 and 201 are listed as arable.

The First Edition OS Map of 1889 (Figure 4) shows the area in more detail than the early maps and likely with more accuracy. It would appear that there have been further boundary changes in this area, and the Site is shown as part of a single large field at this time, extending to Church Lane to the north. The buildings to the south of the site have reduced in number, leaving just three, now named *Hill Cottages*, these are likely the earlier house shown on the tithe, but seemingly now subdivided. It is presumed the associated farm buildings were demolished in the mid-19th century. *Hill Cottages* appears to have been accessed from the west at this date. The former access from the east (immediately south of the Site) visible on the Tithe Map is no longer shown in 1889.

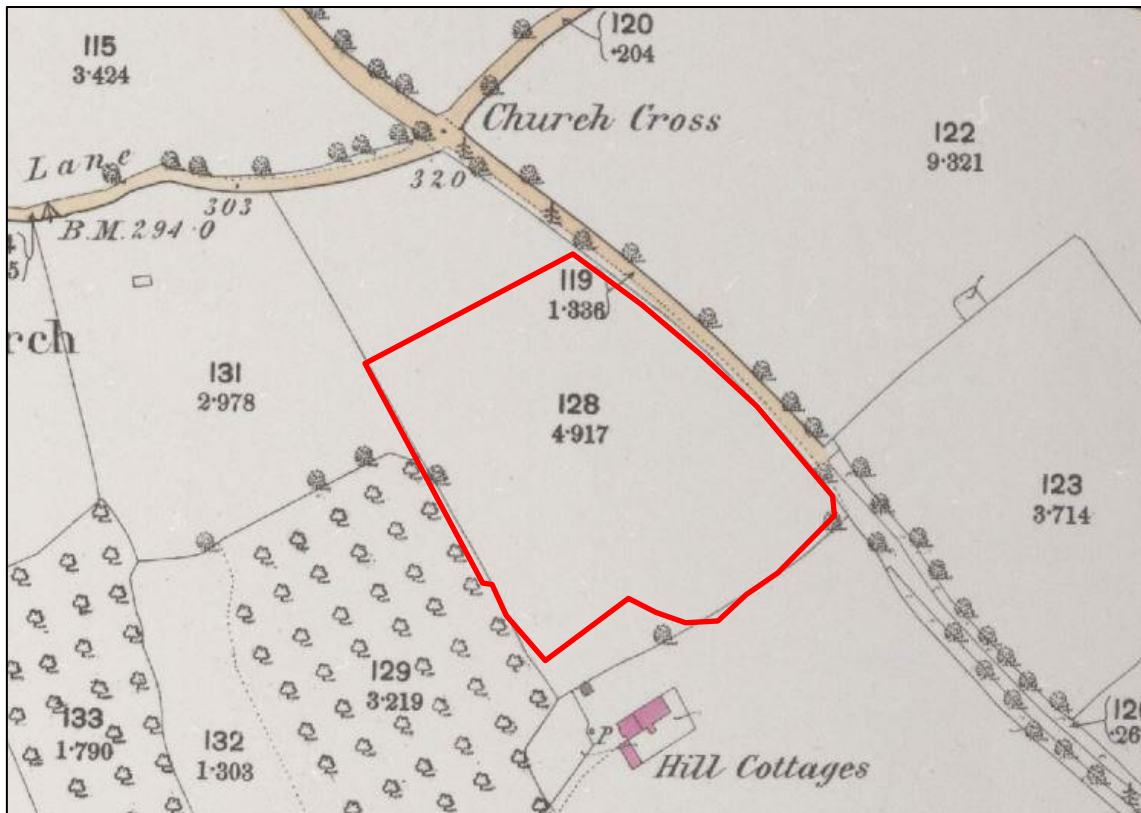


FIGURE 4: EXTRACT OF THE FIRST EDITION 25 INCH OS MAP OF 1889; NLS. THE SITE IS INDICATED.

The Second Edition OS Map of 1905 does not appear to show much change (see Figure 5), although it is possible that the trees along the roadside that runs along the eastern boundary of the Site had all been removed in this time, they are still shown continuing on this road further to the south. The other notable change is that a footpath is again shown providing access to *Hill Cottages* from the East, although the main access still appears to be from the west. *Hill Cottages* has an associated Well to the east, which on the first edition was noted as a Pump.



FIGURE 5: SECOND EDITION OS MAP OF 1905; NLS. THE APPROXIMATE SITE IS INDICATED.

The 1934 Ordnance Survey Map (Figure 6) shows the site boundaries rearranged once more, this time dividing the site into the three sections that remain visible today. The orchards in the surrounding area appear to have been reduced or removed. *Hill Cottages* have seemingly been renamed *Woolsgrove* by this date. Buildings have been constructed to the north, south and west of the site, seemingly a mixture of residential (to the south) and outbuildings to the north and west. The construction of the house to the south (now called *Woolsgrove*, suggesting that the name may be wrongly located on this map) seemingly led to the current lane to the south of the Site having been slightly diverted along its current course. The public footpath which runs to the west of the Site was established by this date to enable *Hill Cottages* to have access to the various buildings built to the west of the Site.

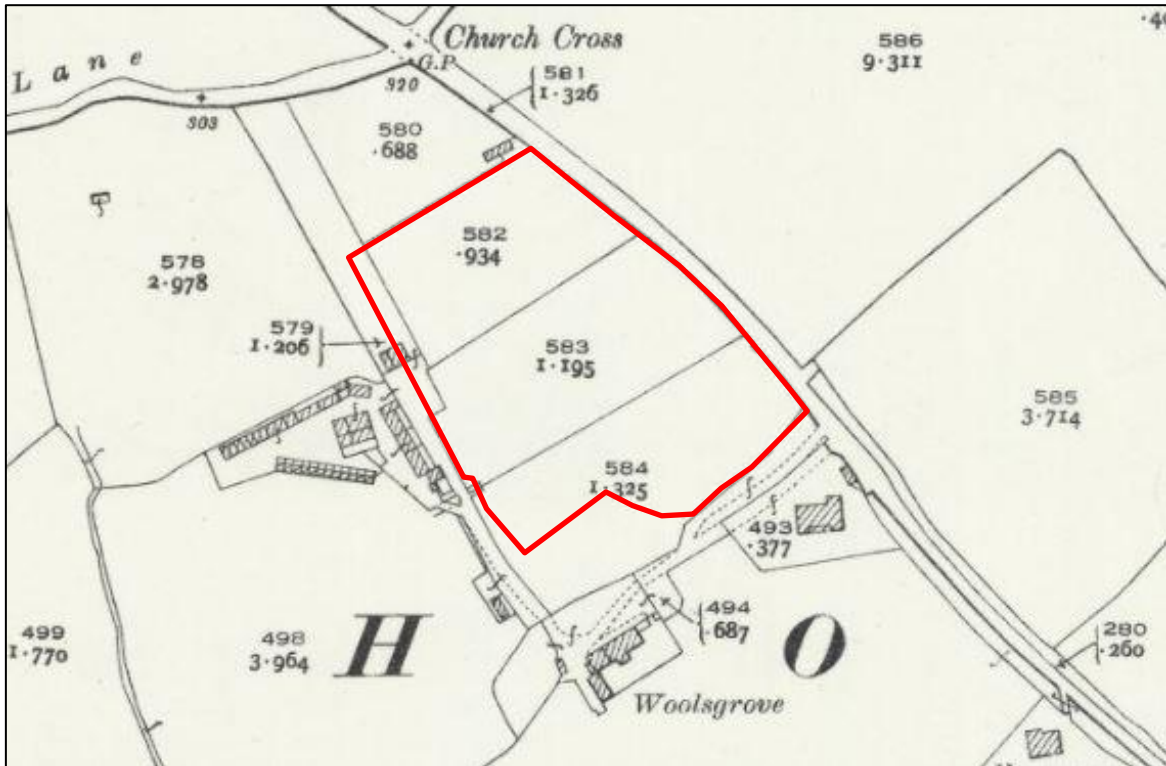


FIGURE 6: EXTRACT OF THE ORDNANCE SURVEY MAP OF 1934. NLS. THE APPROXIMATE SITE IS INDICATED.

The LiDAR for the site (Figure 7) appears to show substantial terracing accompanying the division of the site into three parts in the early 20th century. The ground looks disturbed, particularly in the centre plot. There are no easily recognisable archaeological features within the plot, or in the surrounding area. Modern aerial photos also support this evidence of recent disturbance (see Figure 8).

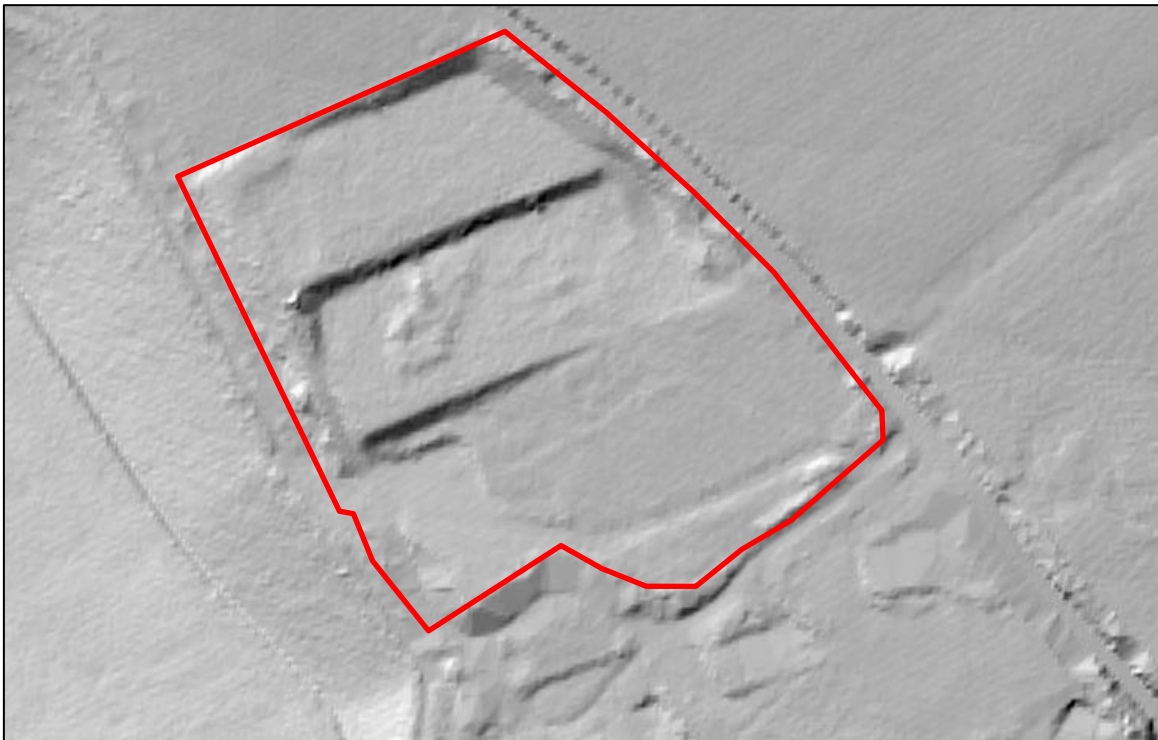


FIGURE 7: THE LIDAR FOR THE SITE. THE APPROXIMATE LOCATION OF THE SITE IS INDICATED. LIDARFINDER.COM



FIGURE 8: GOOGLE IMAGE (FROM THE CLIENT), THE SITE IS SHOWN IN RED, PHASE 1 IS IN BLUE.

3.4 WALKOVER SURVEY

The Site was visited in October 2022 by Dr. S.H. Walls in overcast but dry conditions. The Site is split into three main portions.

The Site is flanked by a public road (Church Hill) to the east, with a semi-mature hedge and some trees along this boundary. The northern boundary is an overgrown fence line, with privately owned pasture field beyond. To the south is a private lane which provides access to several properties to its south, this southern boundary is a slightly overgrown hedge, with some more mature trees to the south-west. The eastern boundary is a very mixed and overgrown hedge, with some small young trees, to the southern end, buildings within the Site partly form the southern part of this boundary. The eastern boundary is flanked by a public footpath which leads to the Church, the footpath has traces/ evidence of brick footings visible in the floor, which presumably relate to some of the structures shown on the 1930s mapping.

The Site is accessed off the lane to the south via a modern metal field gate towards the south-east corner of the southern boundary. There is a stoned, mostly earth track leading west from this gate towards a roughly square and terraced level yard area. The yard has modern buildings to its west side, and multiple cars stored to its southern edges. To the east of this modern terraced yard is a fenced paddock with very closely cropped grass, this portion of the site seems to slope gently to the south. There was a clear earthwork track across this paddock leading from the current gate in the south-west of the field to the north-west and the rest of the Site. There was a fenced boundary forming the northern edge of this paddock.



FIGURE 9: THE SITE, SHOWING ACCESS TRACK LEADING TO MODERN BUILDINGS (TO THE RIGHT OF THE IMAGE), CLOSELY CROPPED HORSE PADDOCK IN THE FOREGROUND; VIEWED FROM THE EAST (NO SCALE).

The central portion of the site at visiting was overgrown scrub and waste, there was some trace of east-west rutting of the ground. The northern boundary of this central part was formed by an earthwork, with the field having been terraced into the slope. There were some more mature young trees and Hawthorn along this earthwork boundary.

The upper, northern part of the Site was similarly overgrown and this portion of the site was very rutted, presumably from last ploughing prior to abandonment, and/or vehicle tracks.

3.5 ARCHAEOLOGICAL POTENTIAL AND IMPACT SUMMARY

The site is located in an area of agricultural land which appears to have changed its boundaries and divisions multiple times since the beginning of the 19th century. While it is possible that there were some buildings encroaching in the site in the 20th century, and the site appears to have been substantially landscaped at this time, likely as part of a market garden or similar. These works included substantial terracing of the site, particularly to the north-east of the Site (see Figure 10).

Despite the proximity of the Site to the Church, all fieldwork carried out in neighbouring plots indicates that in general there is a low potential for archaeological remains in the area. The names

of the plots were descriptive rather than indicative of any earlier function or remains, therefore the archaeological potential for below ground remains on the site is considered to be very low.



FIGURE 10: THE NORTHERN PART OF THE SITE, SHOWING THE SUBSTANTIVE TERRACING, VIEWED FROM THE WEST (NO SCALE).

TABLE 1: SUMMARY OF DIRECT IMPACTS.

Asset	Type	Distance	Value	Magnitude of Impact	Assessment	Overall Assessment
Direct Impacts						
Unidentified archaeological features	U/D	Onsite	Low	High	Neutral/Slight	Neutral/Slight

4.0 INDIRECT IMPACTS

4.1 METHODOLOGY

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

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

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

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

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

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

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

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

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

are compiled during these visits. If a ZTV has been used in the assessment, the accuracy of the ZTV is corroborated with reference to field observations.

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

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

4.2 QUANTIFICATION

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

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

With an emphasis on practicality and proportionality (see *Setting of Heritage Assets* p15 and p18), only those assets where there is the possibility for an effect greater than negligible (see Table 4 in Appendix 2) are considered here in detail and in summary Table 5. All other Scheduled and Listed assets can be seen listed and mapped in section 4.1, although they have been scoped out of this assessment due to their neutral relationship to the proposed development.

- Category #1 assets: St Michael and All Saints Church
- Category #2 assets: None
- Category #3 assets: Grade II Listed assets including, Clapper Gate, Church Cross, Rectory, Home Farm, and Jonas Pyne.

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

4.3 IMPACT BY CLASS OF MONUMENT OR STRUCTURE

4.3.1 CHURCHES AND PRE-REFORMATION CHAPELS

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

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

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

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

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

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

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

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

What is important and why

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

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

Asset Name: The Church of St. Michael and All Angels	
<i>Parish:</i> Pinhoe	<i>Value:</i> High
<i>Designation:</i> GII*	<i>Distance to Development:</i> c.250m
<p><i>Reason for Designation:</i> The Church of St. Michael is listed at Grade II* for the following principal reasons: * Architectural interest * Age; *Group value</p> <p><i>Description: Listing:</i> II* Church. Late C14/Early C15, with 1879-80 rebuilding of Chancel by Christian and other restoration by Fulford. Limestone with red sandstone west tower, slate roof. 3-stage castellated tower. 3-bay nave with north aisle only. Perpendicular wagon roof, also Perpendicular pulpit and screen with restoration by Hems in 1879-80. Poor box of 1700. Bench ends. Norman font. Stained glass by Drake. (Pevsner, Devon, 1989 ed., p.441)</p>	
<p><i>Conservation Value:</i> The church holds evidential value. The church is of local communal value, and it has aesthetic value.</p>	
<p><i>Authenticity and Integrity:</i> The church is well maintained and still functional as a place of worship.</p>	
<p><i>Setting:</i> The church stands in a large (extended) churchyard on the high slopes above the once dispersed rural settlement of Pinhoe. The church remains largely in isolation from the now sprawling settlement of Pinhoe, in association with the Grade II Listed Rectory. As the site is part of agricultural land that surrounds the Church it forms part of this still rural character and setting of the church.</p>	
<p><i>Contribution of Setting to the Significance of the Asset:</i> The church tower was (in part) clearly designed to be a prominent landscape feature, visible above the surrounding buildings and marking its importance within the community. In common with most parish churches, its vicarage (rectory) was located adjacent to it. Any development that detracts from the visual primacy of the church and its tower is considered to have a negative impact upon its setting and the contribution that its setting makes to the significance of the asset. The proposed development will not impact this, although it will appear in long-distance view as part of the larger settlement, adding to the cumulative impact of modern housing developments.</p>	
<p><i>Magnitude of Effect:</i> Views to the upper parts of the church are possible from the proposed development site, particularly from the northern end of the Site. The overgrown nature of the Site means that views of the Site were not noted from around the Church or Churchyard, although the eastern boundary was visible. The orientation of the church means that views out from inside the church building towards the development are unlikely. Views out from the churchyard are largely focused on the wide open views to the south.</p>	
<p><i>Significance of Effects:</i> High value asset and slight change = Moderate impact</p>	
<p><i>Magnitude of Impact:</i> Moderate Adverse</p>	



FIGURE 11: ST MICHAEL AND ALL ANGELS CHURCH VIEWED FROM THE NORTH-EAST.

4.3.1 SITE SPECIFIC IMPACT

The Site has no value itself as a heritage asset, with the buildings located on Site, all being modern and of no architectural merits. The rural character of the site, and hedgebanks contribute to wider character of the landscape, and these should be retained and improved where appropriate.

The Site is considered to have no heritage value, and so the demolition of the standing buildings and development of the Site whilst a major adverse impact gives a **neutral** significance of effect.

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**. There is the potential for some constructional phase impacts on the heritage assets in closest proximity to the proposed development, predominately in the in/creased 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 inevitably varies according to landscape character. The Site is located on the edge of a built-up urban (sub-urban) area, and the former agricultural land to the south-west of the Site is currently being developed by Verto Homes; with a further development currently being finished across the road (Church Hill), to the East of the Site. No other proposed developments in this area are known. Given the level of development which has taken place around the Grade II* Listed church, the proximity of the proposed development to the designated asset, and the potential to further alter the suburban feel of the area, the cumulative impact of this development is considered **moderate**.

4.3.4 HISTORIC LANDSCAPE

The proposed development lies within part of Pinhoe which has remained largely agricultural since at least the 19th century. Modern developments have impacted on the character of the area, however the Church remains very rural in its settings, and the Site supports the wider context for the setting of this Grade II* Listed church. The loss of this element of the historic landscape whilst altering the character would be considered to have a **minor** impact overall.

TABLE 2: SUMMARY OF IMPACTS AND EFFECTS

Asset	Type	Distance	Value	Significance of Effects	Magnitude of Impact	Overall Assessment
Indirect Impacts						
St. Michael and All Angel's Church	GII*	250m	High	Slight/Moderate	Moderate Adverse	Moderate Adverse
Clapper Gate	GII	220m	Medium	Neutral	No Change	Neutral
Church Cross	GII	260m	Medium	Neutral	No Change	Neutral
Rectory and Barn Adjoining	GII	275m	Medium	Neutral	No Change	Neutral
Home Farm	GII	285m	Medium	Neutral	No Change	Neutral
Jonas Pyne	GII	315m	Medium	Neutral	No Change	Neutral
Site Specific impacts	None	0m	None	Neutral	Major Adverse	Neutral
Landscape Character						
Historic Landscape	n/a	n/a	Low	Moderate	Moderate Adverse	Slight Adverse
Aggregate Impact	n/a	n/a			Negligible Adverse	Neutral/Slight Adverse
Cumulative Impact	n/a	n/a				Moderate Adverse

4.3.5 RECOMMENDATIONS AND MITIGATION

From a heritage impact perspective, the proposals have already taken very sensible measures to minimise the level of harm, and the proposed use of bungalows on the upper parts of the Site is considered to be very appropriate. The cumulative impact of this Site adding to the multiple residential developments already occurring around the northern edge of Pinhoe village is an issue, but the most important heritage asset group around the Church remains amazingly rural and largely insulated from these still. It is recommended that the Church group should continue to remain detached from the modern housing developments.

5.0 CONCLUSION

The site lies in the historic parish of Pinhoe, now a suburb of the city of Exeter, part of an area recorded on the Devon Historic Landscape Characterisation (HLC) as Modern: *Areas set aside for recreation including sports fields and stadiums, golf courses, fishing lakes, campsites*. Documentary and cartographic evidence suggests that there is a low potential for the survival of archaeological deposits and features within the site boundary.

The Site lies in the former landholding of the Hill, part of the lands of the Poltimore Estate since at least the early 19th century. The Site was located close to the centre of the holding with Hill View Cottages located on the Site of the former farmhouse, and a group of outbuildings formerly located to the South of the Site in 1840. In the early to Mid-20th century the Site became subdivided from a larger field, and may have formed part of a market garden, with the three new plots all terraced into the slope. The Site has since been landscaped further with a modern track and yard built in the southern part of the site.

Fieldwork carried out in neighbouring plots indicates that there is a low potential for archaeological remains in the area. The proposals for a residential development on the Site are therefore unlikely to significantly impact any below ground archaeology, especially as it is considered very unlikely that anything will have survived 20th and 21st century works on the Site. In terms of impact the Grade II* Listed Church of St Michael and All Angels is very sensitive to further changes to its setting and whilst the proposals will further encroach upon this setting any harm is largely as part of the cumulative impact of developments in Pinhoe. The Church will retain its rural setting and character, and the proposed use of bungalows on the upper parts of the Site will minimise the impact of the development on heritage assets and the wider landscape.

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APPENDIX 1: IMPACT ASSESSMENT METHODOLOGY

Heritage Impact Assessment - Overview

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

National Policy

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

Paragraph 194

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

Paragraph 195

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

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

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

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

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

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NP_PF_July_2021.pdf.

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

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

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

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

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 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*⁹.

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

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

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

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

Once an assessment of value and significance has been made, either by reference to designation or comparable importance if undesignated, the significance of the effect (TABLE 5) and magnitude of the impact (TABLE 6) can be determined. The former is logical and objective, the latter is a more nuanced but subjective, and the accompanying

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

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

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

discussion provides the more narrative but subjective approach advocated by Historic England. This is a useful balance between rigid logic and nebulous subjectivity (e.g. the significance of effect on a Grade II Listed building can never be greater than moderate/large; an impact of substantial adverse is almost never achieved). This is in adherence with GPA3¹².

In the NPPF, adverse impact is divided into the categories: *total loss*, *substantial harm*, and *less than substantial harm*. The bar for substantial harm was set at a very high level in 2013 by the case *Bedford BC v SSCLG38*. However, following a recent High Court action¹³ it is possible a *major adverse impact* may now qualify as a *substantial harm*. Any lesser adverse impact will constitute a *less than substantial harm*. TABLE 7 shows how this report correlates the two systems.

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

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

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

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

Value and Importance

While every heritage asset, designated or otherwise, has some intrinsic merit, the act of designation creates a hierarchy of importance that is reflected by the weight afforded to their preservation and enhancement within the planning system. The system is far from perfect, impaired by an imperfect understanding of individual heritage assets, but the value system that has evolved does provide a useful guide to the *relative* importance of heritage assets. Provision is also made for heritage assets where value is not recognised through designation (e.g. undesignated 'monuments of Schedulable quality and importance' should be regarded as being of *high* value); equally, there are designated monuments and structures of *low* relative merit. TABLE 3: THE HIERARCHY OF VALUE/IMPORTANCE (BASED ON THE DMRB LA104 2020 TABLE 3.2N). TABLE 3 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.

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

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

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

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

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

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

TABLE 3: 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.

TABLE 4: 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 5: 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
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TABLE 6: 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 7: SCALES OF IMPACT AS PER THE NPPF, RELATED TO TABLE 6.

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

Staged Investigation – Direct Impact

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

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

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

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

9. Walkover survey (or for historic buildings, a historic building appraisal²⁰).
10. Geophysical survey, if suitable (magnetometry, electrical resistance, ground-penetrating radar)²¹.
11. Archaeological trench evaluation²², if appropriate.

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

Type of Impact

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

Staged Investigation – Indirect Impact

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

6. Identify which heritage assets and their settings are affected.
7. Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.
8. Asses 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).

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

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

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

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

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

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

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

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

As discussed (elsewhere, this document), the critical assessment is to determine the contribution of setting to the significance of the heritage asset, and/or the ability of the setting to facilitate an appreciation of that significance. Views are important but not paramount, and views to and from a proposed development can exist without adverse effect. Some assets are intrinsically more sensitive to change in their environment than others; a useful shorthand for this can be found in TABLE 8.

TABLE 8: 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

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

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 states²⁶: *When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.*

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

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

Aggregate Impact

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

Definitions

Heritage Assets

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

Significance

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

Conservation Principles

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

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

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

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

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

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

Evidential Value

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

Historical Value

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

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

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

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

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

Aesthetic Value

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

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

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

Communal Value

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

Commemorative and symbolic value reflects the meanings of a place to those who draw part of their identity from it, or who have emotional links to it e.g. war memorials. Some buildings or places (e.g. the Palace of Westminster) can symbolise wider values. Other places (e.g. Porton Down Chemical Testing Facility) have negative or uncomfortable associations that nonetheless have meaning and significance to some and should not be forgotten.

Social value need not have any relationship to surviving fabric, as it is the continuity of function that is important. Spiritual value is attached to places and can arise from the beliefs of a particular religion or past or contemporary perceptions of the spirit of place. Spiritual value can be ascribed to places sanctified by hundreds of years of veneration or worship, or wild places with few signs of modern life. Value is dependent on the perceived survival of historic fabric or character and can be very sensitive to change. The key aspect of communal value is that it brings specific groups of people together in a meaningful way.

Significance in the NPPF

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

Archaeological Interest

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

Architectural and Artistic Interest

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

Historic Interest

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

Concepts from World Heritage Guidance

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

Authenticity

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

Integrity

Integrity is the measure of wholeness or intactness of the cultural heritage and its attributes. Outside of a World Heritage Site, integrity can be taken to represent the survival and condition of a structure, monument, or

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

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

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

landscape. The intrinsic value of those examples that survive in good condition is undoubtedly greater than those where survival is partial, and condition poor.

Designated Heritage Assets

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

Listed Buildings

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

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

Buildings are split into various levels of significance: Grade I (2.5% of the total) representing buildings of exceptional (international) interest; Grade II* (5.5% of the total) representing buildings of particular (national) importance; Grade II (92%) buildings are of merit and are by far the most widespread. Inevitably, accuracy of the Listing for individual structures varies, particularly for Grade II structures; for instance, it is not always clear why some 19th century farmhouses are Listed while others are not, and differences may only reflect local government boundaries, policies and individuals.

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

Conservation Areas

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

Scheduled Monuments

In the United Kingdom, a Scheduled Monument is considered an historic building, structure (ruin), or archaeological site of national importance. Various pieces of legislation, under planning, conservation, etc., are used for legally protecting heritage assets given this title from damage and destruction; such legislation is grouped

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

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

Registered Parks and Gardens

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

Registered Battlefields

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

World Heritage Sites

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

Setting

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Curtilage

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

Historic Character

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

Context

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

Landscape Context

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

Landscape context is based on topography and can vary in scale from the very small – e.g. a narrow valley where views and vistas are restricted – to the very large – e.g. wide valleys or extensive upland moors with 360° views.

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

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

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

Where very large landforms are concerned, a distinction can be drawn between the immediate context of an asset (this can be limited to a few hundred metres or less, where cultural and biological factors impede visibility and/or experience), and the wider context (i.e. the wider landscape within which the asset sits).

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

Principal Views, Landmark Assets, and Visual Impact

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

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

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

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

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

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



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