

ODD DOWN SPORTS PAVILION CHELWOOD DRIVE ODD DOWN BATH

Results of a Heritage Assessment



South West Archaeology Ltd. Report No. 230707



www.swarch.net

Tel. 01769 573555
01872 223164

Odd Down Sports Pavilion, Chelwood Drive, Bath

Results of Heritage Assessment

By F. Balmond MCIfA
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Work undertaken by SWARCH for GLL

SUMMARY

This report presents the results of a heritage assessment carried out by South West Archaeology Ltd. for Odd Down Sports Pavilion, Bath for a proposed extensions and alterations to the sports pavilion and facilities.

Odd Down historically lay in the parish of Lyncombe with Widcombe, formed from two separate parishes in the mid-19th century. Odd Down appears to have lain within Lyncombe parish. Lyncombe was documented as a relatively large manor at Domesday, held by the Abbey of Bath, who had also held the manor in 1066. The manor was purchased by Hugh Sexey in the early 17th century, following the dissolution of the monasteries in the mid-16th century. The land on which Odd Down Sports Ground sits appears to have been part of the holding of Barracks Farm during the 18th and 19th centuries, changing ownership during this period. The Conservation Area Character Area appraisal for this part of the Bath Conservation Area notes that Barrack is a corruption of Berewyke, taken from the de Berewyke family who held a free tenement in this area in the 13th century. The lost Medieval settlement of Berewyke is believed to lie around the former location of Barrack/Lower Barrack Farm and Lower Barrack farmhouse, demolished in the 1970s is believed to have comprised the last element of the medieval settlement (BANES 2018).

Limited archaeological investigation has been carried out on the site and its immediate surroundings. A watching brief was carried out during the construction of the current sports centre in 2014 which encountered no archaeological deposits or features. There are 34 Listed Buildings (1 Grade II), one scheduled monument, one Conservation Area and the City of Bath World Heritage Site (which has two UNESCO inscriptions) within 1km of the site. There are no Registered Parks and Gardens or Registered Battlefields within 1km of the site.*

The impact on heritage assets within the vicinity of the proposed development has been considered. The location of the site within the City of Bath World Heritage Site, adjacent to the Bath Conservation Area means that any development would need to be appropriate in design, scale and proportion to retain the significance of these assets and their settings. The proposed canopy for the Padel tennis courts is believed to be the main detracting element of the design, its relative scale and use of materials likely to impact on the appreciation of the significance of these heritage assets. The overall impact of the proposed works in relation to nearby heritage assets is considered moderate adverse, reduced to slight adverse if recommendations given in this report are adopted.



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PROJECT CREDITS

PROJECT DIRECTOR: DR. SAMUEL WALLS MCIFA
PROJECT MANAGER: DR. SAMUEL WALLS MCIFA
FIELDWORK: FAYE BALMOND MCIFA
REPORT: FAYE BALMOND MCIFA
EDITING: DR. SAMUEL WALLS MCIFA
GRAPHICS: FAYE BALMOND MCIFA

1.0 INTRODUCTION

LOCATION:	ODD DOWN SPORTS PAVILION
PARISH:	CITY OF BATH
COUNTY:	BATH
NGR:	ST7386262580
PLANNING NO.	22/04921/PA03
OASIS NUMBER:	SOUTHWES1-517179
SWARCH REF.	BODS23

1.1 PROJECT BACKGROUND

South West Archaeology Ltd. (SWARCH) was commissioned to undertake a heritage assessment for Odd Down Sports Pavilion, Bath. This work was undertaken in accordance with best practice and ClfA guidance.

1.2 TOPOGRAPHICAL AND GEOLOGICAL BACKGROUND

The proposed development is located at Odd Down Sports Pavilion, Chelwood Drive, Bath at c.165m AOD. The site comprises a sports centre with The Tumps to the north, the A367 to the east, Chelwood Drive to the south and Bloomfield Road to the west. The soils of this area are unsurveyed, largely urban or industrial areas (SSEW 1983). The bedrock geology is limestone of the Combe Down Oolite member (BGS 2023).

1.3 HISTORICAL & ARCHAEOLOGICAL BACKGROUND

Odd Down historically lay in the parish of Lyncombe with Widcombe, formed from two separate parishes in the mid 19th century. Odd Down appears to have lain within Lyncombe parish. Lyncombe was documented as a relatively large manor at Domesday, held by the Abbey of Bath, who had also held the manor in 1066. The manor was purchased by Hugh Sexey in the early 17th century, following the dissolution of the monasteries in the mid 16th century. The land on which Odd Down Sports Ground sits appears to have been part of the holding of Barracks Farm during the 18th and 19th centuries, changing ownership during this period. The Conservation Area Character Area appraisal for this part of the Bath Conservation Area notes that Barrack is a corruption of Berewyke, taken from the de Berewyke family who held a free tenement in this area in the 13th century. The lost Medieval settlement of Berewyke is believed to lie around the former location of Barrack/Lower Barrack Farm and Lower Barrack farmhouse, demolished in the 1970s is believed to have comprised the last element of the medieval settlement (BANES 2018).

The proposal site lies in an area classified as *Post Medieval (18th -19th century) parliamentary enclosure* in the Avon Historic Landscape Characterisation. Limited archaeological investigation has been carried out on the site and its immediate surroundings. A watching brief was carried out during the construction of the current sports centre in 2014 which encountered no archaeological deposits or features. There are 34 Listed Buildings (1 Grade II*), one scheduled monument, one Conservation Area and the City of Bath World Heritage Site (which has two UNESCO inscriptions) within 1km of the site. There are no Registered Parks and Gardens or Registered Battlefields within 1km of the site.

1.4 METHODOLOGY

This archaeological assessment was undertaken in accordance with best practice. The heritage assessment follows the guidance outlined in: Conservation Principles: policies and guidance for the sustainable management of the historic environment (English Heritage 2008), The Setting of

Heritage Assets (Historic England 2015), Seeing History in the View (English Heritage 2011), Managing Change in the Historic Environment: Setting (Historic Scotland 2010), and with reference to Guidelines for Landscape and Visual Impact Assessment 3rd Edition (Landscape Institute 2013). The impact assessment also follows the guidance outlined in the Principles of Cultural Heritage Impact Assessment in the UK produced by Cifa, IHBC and IEMA in July 2021.

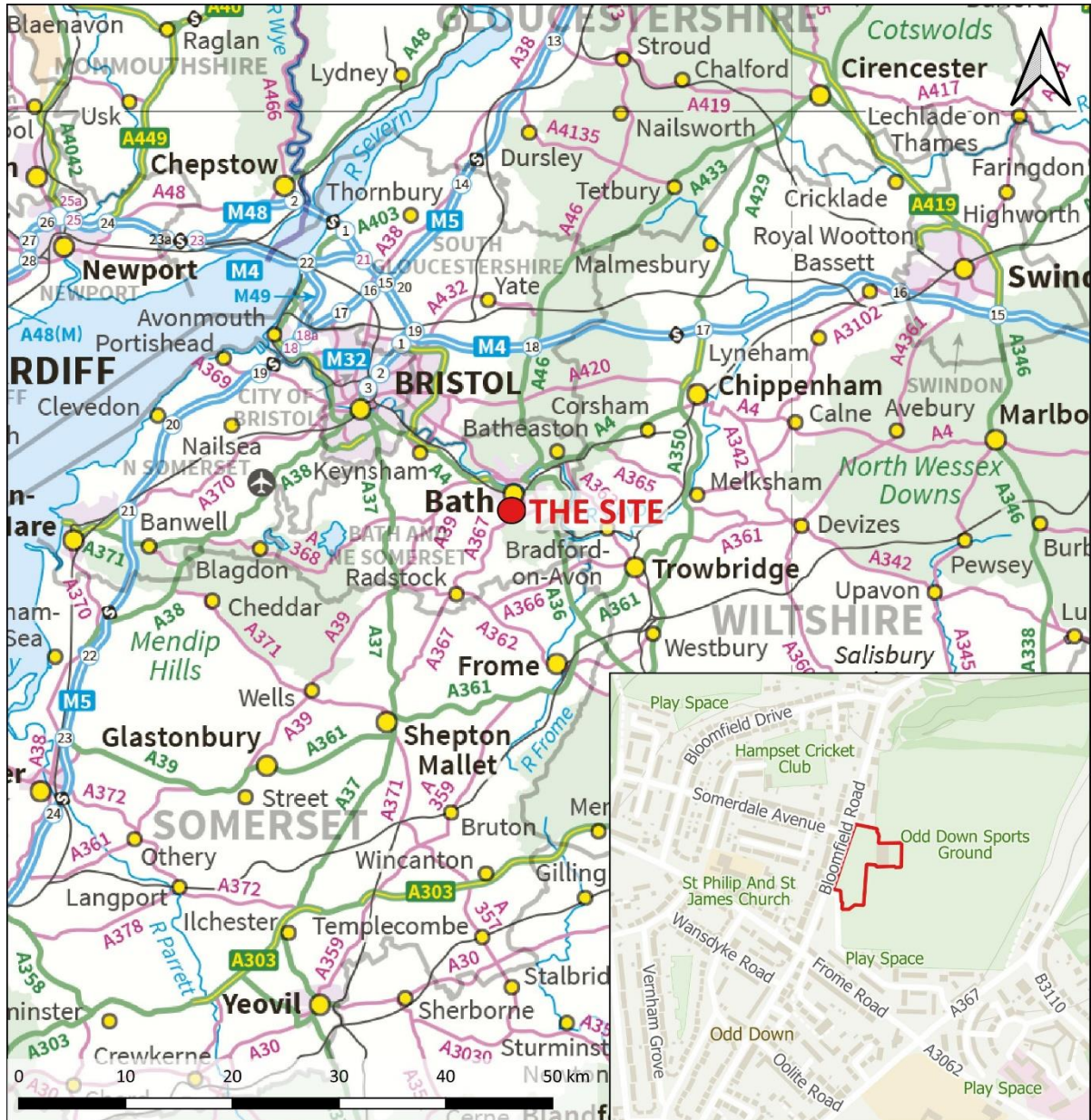


FIGURE 1: SITE LOCATION.

2.0 HERITAGE IMPACT ASSESSMENT

2.1 HERITAGE IMPACT ASSESSMENT - OVERVIEW

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

2.2 NATIONAL POLICY

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

Paragraph 189

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

Paragraph 194

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

Paragraph 195

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

Paragraph 206

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

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

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

Paragraph 207

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

2.3 LOCAL POLICY

2.3.1 BATH AND NORTH EAST SOMERSET LOCAL PLAN JAN 2023: POLICY HE1: HISTORIC ENVIRONMENT *Safeguarding Heritage Assets*

1) Within the scope of Core Strategy Policies B4 and CP6, development that has an impact upon a heritage asset, whether designated or nondesignated, will be expected to enhance or better reveal its significance and/or setting, and make a positive contribution to its character and appearance.

2) The District's historic environment shall be sustained and enhanced. This includes all heritage assets including the Bath World Heritage Site, historic buildings, conservation areas, historic parks and gardens, landscape, archaeology and townscapes of importance.

3) Applications affecting the significance of any heritage asset will be required to provide sufficient information to demonstrate how the proposals would contribute to the asset's conservation.

4) The Historic Environment Record, including Conservation Area Character Appraisals and Management Plans will be used to inform the consideration of future development including potential conservation and enhancement measures.

5) Great weight will be given to the conservation of the District's heritage assets. Any harm to the significance of a designated or non-designated heritage asset must be justified. Proposals will be weighed against the public benefits of the proposal; whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset.

6) If such harm can be fully justified, where relevant the Council will require archaeological excavation and/or historic building recording as appropriate, followed by analysis and publication of the results.

7) In addition, the following will apply to specific asset types as listed below:

a) City of Bath World Heritage Site

Development within the City of Bath City World Heritage Site will be expected to comply with Policy B4 of the Core Strategy and all other relevant supplementary information and guidance; and help support the delivery of the World Heritage Site Management Plan.

b) Listed buildings

The significance of listed buildings is required to be sustained and enhanced. Appropriate repair and reuse of listed buildings will be encouraged. Alterations, extensions or changes of use, or development in their vicinity, will be expected to have no adverse impact on those elements which contribute to their special architectural or historic interest, including their settings.

c) Conservation Areas

Development, including any proposed demolition, within or affecting the setting of a conservation area will only be permitted where it will preserve or enhance those elements which contribute to the special character or appearance of the conservation area. The Council will look for opportunities from new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance.

d) Archaeology

Scheduled monuments and other non-designated archaeological sites of equivalent significance should be preserved in situ. In those cases where this is not justifiable or feasible provision should be made for their excavation and recording. The appropriate publication and curation of the finds/archive will be required.

e) Registered Historic Parks and Gardens

Development will be expected to respect the design, character, appearance and settings of registered historic parks and gardens and to safeguard those features which contribute to their significance and are integral to their character and appearance.

f) Lansdown Registered Historic Battlefield

Development will be expected to respect the character, appearance and setting of the Lansdown battlefield, safeguarding those features which contribute to its significance.

g) Non-designated heritage assets

Proposals affecting non-designated heritage assets, including unscheduled archaeology, unlisted buildings and local parks and gardens, should ensure they are conserved having regard to their significance. Where development viability assessments are required developers should demonstrate that the policy requirements, including to sustain and enhance the District’s historic environment, have been considered and reflected in the land or site value.

2.4 STRUCTURE OF ASSESSMENT – DIRECT AND INDIRECT IMPACTS

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

2.5 DEVELOPMENT PROPOSALS

The proposed development comprises an extension to the existing sports pavilion and creation of Padel Tennis Courts including some alterations to parking areas.



FIGURE 2: PROPOSED EXTENSION TO THE EASTERN SIDE OF PAVILION AND PADEL TENNIS COURTS (SUPPLIED BY CLIENT)

3.0 DIRECT IMPACTS

3.1 STRUCTURE OF ASSESSMENT

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

3.2 DOCUMENTARY HISTORY

Odd Down historically lay in the parish of Lyncombe with Widcombe, formed from two separate parishes in the mid-19th century. Odd Down appears to have lain within Lyncombe parish. Lyncombe was documented as a relatively large manor at Domesday, held by the Abbey of Bath, who had also held the manor in 1066. The manor was purchased by Hugh Sexey in the early 17th century, following the dissolution of the monasteries in the mid-16th century.

18th century mapping shows the area of Odd Down Sports Ground lay within the holding of Barracks Farm. Lower Barracks Farm, on the adjacent side of the road is also named Barwick's in a document from 1800 held at the Somerset Heritage Centre D\T\ba/46. The Conservation Area Character Area appraisal for this part of the Bath Conservation Area notes that Barrack is a corruption of Berewyke, taken from the de Berewyke family who held a free tenement in this area in the 13th century. The lost Medieval settlement of Berewyke is believed to lie around the former location of Barrack/Lower Barrack Farm and Lower Barrack farmhouse, demolished in the 1970s is believed to have comprised the last element of the medieval settlement, although possibly rebuilt in the 17th century (BANES 2018).

In 1799 the land appears to have been in the ownership of John Palmer Esq and by the tithe apportionment of 1839 Thomas Hansford was the owner and occupier of the land on which Odd Down Sports Pavilion sits. It had evidently been sold away from the manorial land holding at some point prior to the late 18th century. The 1841 census records Thomas Hansford as a Yeoman, residing at barracks Farm with his wife and daughter. His will (TNA PROB 11/2120/344) documents him as a gentleman of Lyncombe and Widcombe and makes reference to his farmlands at 'Upper Barracks Farm' as paying an annuity to his widow. The area appears to have experienced a downturn in the mid 19th century with the 1851 census recording a number of unoccupied houses in this area. Barrack Farm appears to be referred to as 'Old Barrack Farm' and is occupied by Isaac Huggins, a farm labourer and his family. By 1861 it appears that 'Upper Barrack Farm' may have been divided into two cottages, one occupied by John Barrett, an agricultural labourer and his family, and the other by John Hawkins, a mason, and his wife; by 1871 both dwellings were occupied by their widows, who were documented as 'laundress's'. The 1881 census marks the renaming of these cottages as '1 and 2 Welborne Cottages'. No 1 was occupied by John Davis, a returning officer and No 2 by Isaac Sharman, a gardener. By 1891 the cottages were occupied by George White (farm labourer) and Samborne Weeks (retired Farmer) respectively. By 1901 the occupants had again changed with William Salter (carpenter and builder) and Henry Inglis (Major Bengal Retired). By 1911 William Salter still appears to be resident and Humphrey Hirst (Chaplain) is documented as the occupant of the other cottage. This suggests that although Barrack Farm appears to have been a significant farmstead in the early 19th century, by the mid 19th century it had declined to become the residence of agricultural labourers and by the later 19th century had been renamed Welborne Cottages. Its land holding presumably

therefore ceased to be associated with it from the mid-19th century. Further details of the land holding and its sale may be found in a detailed examination of the Sexey's estate records held at the Somerset Heritage Centre (SHC).

3.3 CARTOGRAPHIC DEVELOPMENT

There are two early maps to show the site held in the Somerset Heritage Centre. The first by Thomas Thorpe is dated 1742 and shows a 5 mile radius of Bath (DD/SAS/C2993/8). This shows the buildings of Barracks Farm (labelled as Barrocks) and Lower Barracks Farm, to the east of the site, as one unit with orchards to the north and south west. The farmstead comprises three buildings in a rough courtyard arrangement surrounded by agricultural land. The map predates the early 19th century road (Wellsway) which cut the farmstead in two. Another map dating to 1799 (DD/SAS/C212/MAP/91) again shows Barracks Farm before the road constructed through them although five, slightly more dispersed buildings are shown. It is possible the farmstead and land had been split into separate ownership at this date as the easternmost building and fields around it are shown in the ownership of James Chambrey while the remaining yard and buildings with farmland to the east was held by John Palmer Esq. The fields containing the quarries to the north of Odd Down are labelled Upper Pits and Pits. Upper Pits is labelled as being held by the Magdalen Hospital. The field boundary depiction in the area of Odd Down Sports Ground is largely the same as that shown on the tithe map and a building is shown in the location of Crescent Cottages on this map although the terrace to the north (later Bloomfield Crescent) is labelled Cottage Crescent on this map. An access track is shown running east west from what is now Bloomfield Road along the northern boundary of Odd Down Sports Ground to provide access into Barracks Farm.

The 1808 surveyors draft map for Frome indicates buildings at Barrack Farm but doesn't name them. Old stone quarries are labelled, to the north of the site and several buildings are depicted along what is now Broomfield Road, in the approximate location of Crescent Cottages. No buildings are shown in the area of Odd Down Sports Ground but Odd Down is labelled.



FIGURE 3: EXTRACT FROM THE 1808 SURVEYORS DRAFT MAP FOR FROME. THE APPROXIMATE SITE IS INDICATED (BL).

The c.1840 Lyncombe with Wincombe Tithe map provides a more accurate depiction of the site and shows Odd Down sports ground as a number of rectilinear fields. Barracks Farm is clearly labelled and the Bath Union Workhouse is visible to the south east of the site. A number of small roadside dwellings can be seen along the roads bordering the land holding of Barracks Farm.

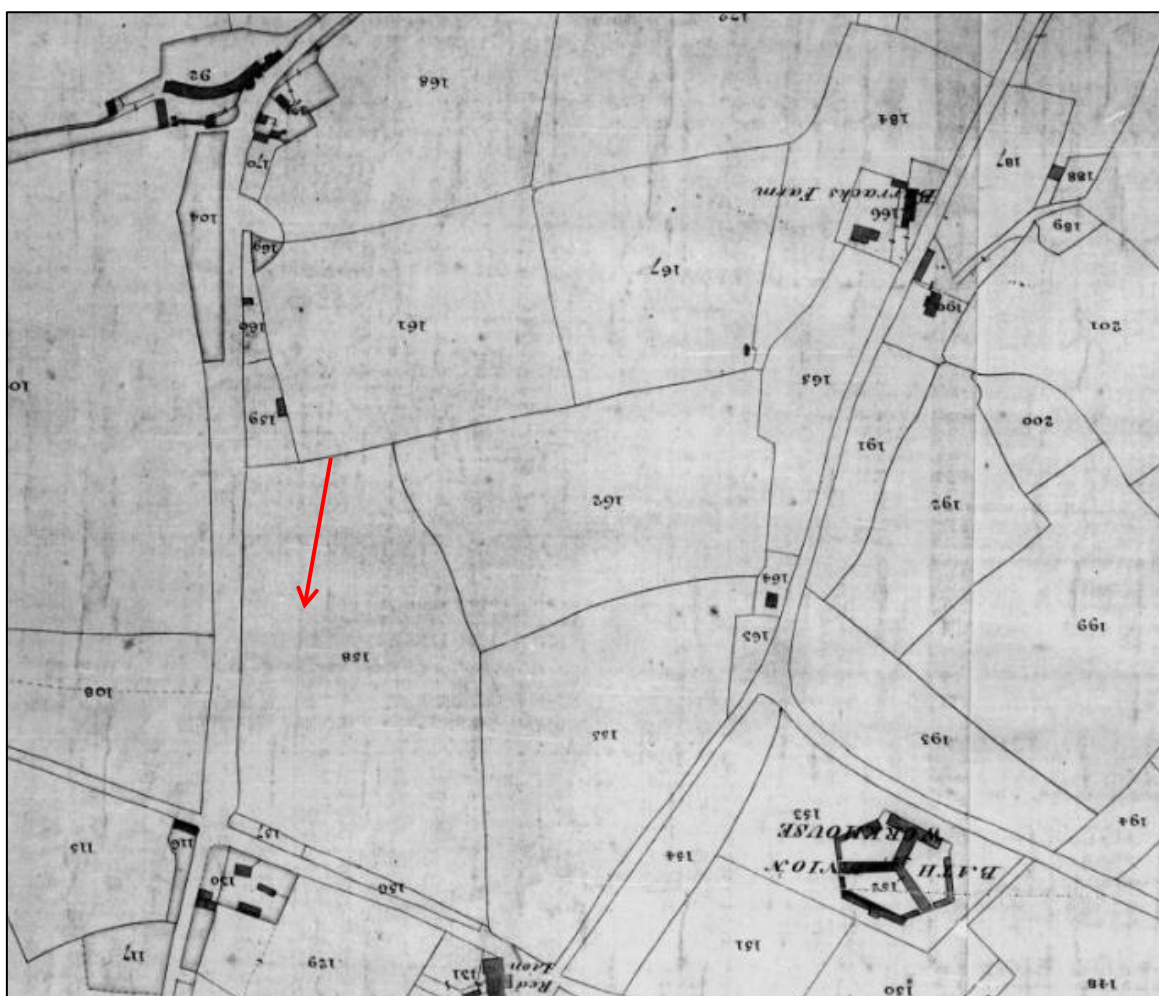


FIGURE 4: EXTRACT FROM THE c.1840S LYNCOMBE WITH WINCOMBE TITHE MAP; THE APPROXIMATE SITE OF ODD DOWN SPORTS PAVILION IS INDICATED (TNA).

TABLE 1: EXTRACT FROM THE 1839 TITHE APPORTIONMENT FOR LYNCOMBE WITH WINCOMBE. PLOTS WITHIN THE SITE AREA ARE SHADED GREEN.

Plot No	Landowner	Occupier	Plot Name	Cultivation
155	Thomas	Himself	Arable Close	Arable
158	Hansford		Close	Arable
160			Close	Arable
161			Close	Arable
165			Paddock	Pasture
166			Barracks Farm House, Outbuildings and garden	
167			Close	Arable
168	James Grant	Himself	Upper Putts	Pasture
172	Smith		Lower Pitts	Pasture

The First Edition Ordnance Survey map surveyed 1882-3 (Figure 5) shows many of the field boundaries shown on the tithe map comprising the holding of Barrack Farm had been removed by this date and the farm renamed Welborne Cottages. Additional buildings can be seen in the location of the former farmstead. Some development of land to the south of the site is also evident and the quarries to the north are mapped as earthworks. A small open fronted building is

shown within the site area, close to the western boundary, in the area of the current car park. The Second Edition Ordnance Survey map of 1902 (Figure 6) shows little change but by the 1936 map revision substantial development can be seen around Odd Down, with the Sports Ground area marked as playing field and the last remaining field boundary shown on the tithe map removed. A building is shown to the south east of Crescent Cottages, in the area of the playing field and several small rectangular structures are shown on the east, south and western sides of the playing field. This map also notes human remains found AD 1929-30, presumably during the construction of the housing along Somerdale Avenue and Bloomfield Road. The tithe apportionment notes this field as being called Gallows Tying, suggesting a historic location of a gallows, although the date is unknown. A tramway is also shown running along the road to the east of the site.

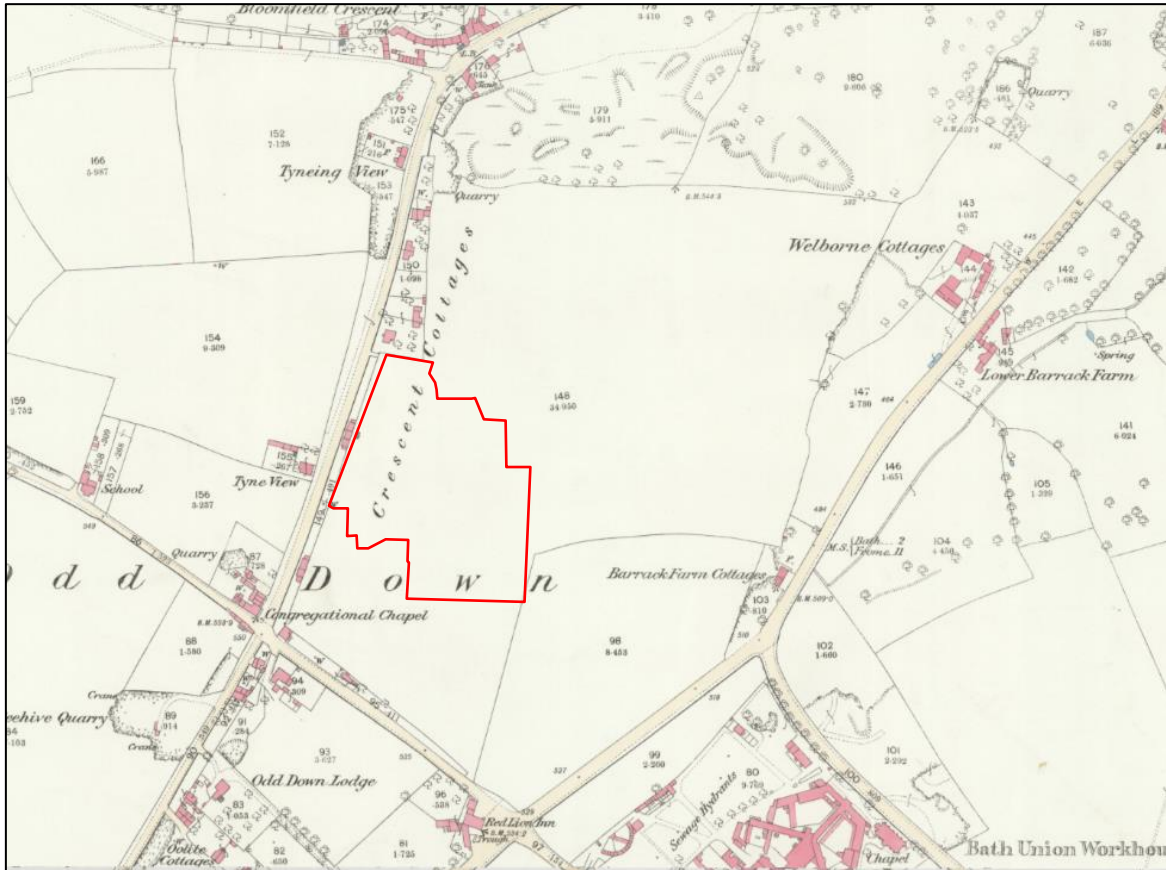


FIGURE 5: EXTRACT FROM FIRST EDITION 25 INCH ORDNANCE SURVEY MAP 1882-3; THE APPROXIMATE SITE IS INDICATED (NLS)

ODD DOWN SPORTS PAVILION, CHELWOOD DRIVE, ODD DOWN, BATH

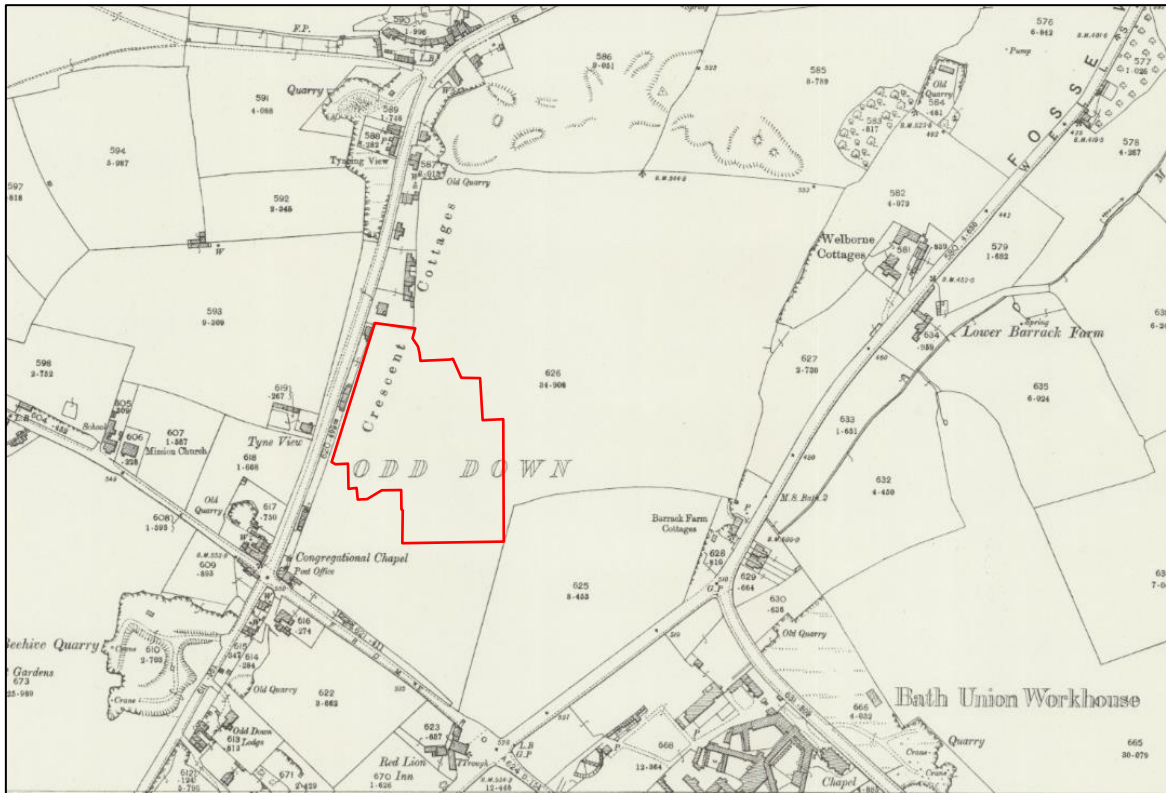


FIGURE 6: EXTRACT FROM THE SECOND EDITION 25 INCH ORDNANCE SURVEY MAP, 1902 (NLS). THE APPROXIMATE SITE IS INDICATED

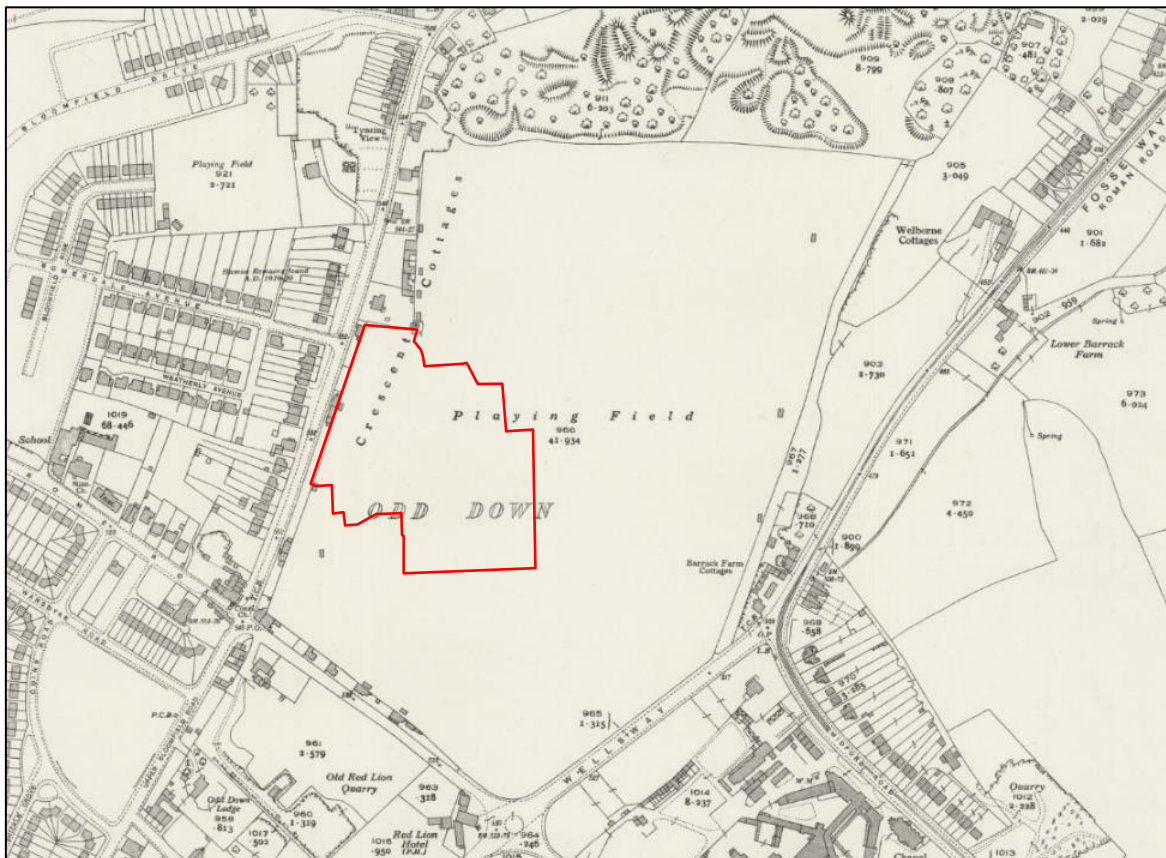


FIGURE 7: EXTRACT FROM THE REVISED SECOND EDITION ORDNANCE SURVEY 25 INCH MAP, REVISED 1936 (NLS). THE APPROXIMATE SITE IS INDICATED.

3.1 ARCHAEOLOGICAL BACKGROUND

The proposal site lies in an area classified as *Post Medieval (18th -19th century) parliamentary enclosure* in the Avon Historic Landscape Characterisation. Limited archaeological investigation has been carried out on the site and its immediate surroundings. A watching brief was carried out during the construction of the current sports centre in 2014 which encountered no archaeological deposits or features.

A 1km radius around the site has been considered. There are 34 Listed Buildings (1 Grade II*), one scheduled monument, one Conservation Area and the City of Bath World Heritage Site (which has two UNESCO inscriptions) within 1km of the site. There are no Registered Parks and Gardens or Registered Battlefields within 1km of the site.

3.1.1 PREHISTORIC 4000BC - AD43

There is limited evidence for Prehistoric activity in the vicinity of the site. There are very few recorded Prehistoric sites or finds within the landscape surrounding the site, although Berwick Camp, a possible Iron Age multivallate hillfort has been identified to the north of the site, however any traces of earthworks have been obscured or removed by housing estates and quarrying activities.

3.1.2 ROMANO-BRITISH AD43 – AD409

Some evidence for Roman occupation was uncovered during excavations for a gas pipeline in the mid 20th century to the east of the site on Wellsway Road. Quarrying activity to the north of the site, in the location of Berwick Camp is also believed to date to the Roman period. Further to the north of the site, a Roman cemetery has been identified at Bloomfield. A number of Roman Roads are identified in the area of the site, the Wansdyke to Bath Roman Road is projected to have run north east- south west through the proposed site area. The route of the Fosse Way lies to the south east and another possible Roman road is recorded to the west.

3.1.3 MEDIEVAL AD410 – AD1540

There is more limited evidence for Medieval occupation in the immediate vicinity of the site although to the east the settlement of Berwick has been identified to the south of Lower Barrack Farm, with evidence of Roman and Medieval settlement in this location.

3.1.4 POST-MEDIEVAL AD1540 -1899

A majority of heritage assets recorded in the vicinity of the site are of Post Medieval date. Most of these relate to Post Medieval residential development and associated infrastructure. E.g., churches needed to serve the expanding population of this area during the Post Medieval period. A workhouse was historically located to the south east of the site, later known as St Martins Hospital.

3.1.5 MODERN 1900-PRESENT AND UNKNOWN

There are a limited number of Modern sites recorded within the vicinity of the site, including a united reformed church to the south west. Other sites of modern date recorded in the BANES HER lie at a greater distance from the site and relate to modern services or World War Two defences.

ODD DOWN SPORTS PAVILION, CHELWOOD DRIVE, ODD DOWN, BATH

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

No	PRN No	Name
1	61504	Berwick Camp, Odd Down playing field, Bath
2	62054	Prehistoric Arrowhead, 90 Hansford Square, Bath
3	60131	Late Bronze Age axe find, Stirlingdale Farm, N of Odd Down, Bath
4	60139	Possible Roman road or part of the Fosseway, Wansdyke to Royal Crescent
5	63077	West Wansdyke, Bath and NE Somerset
6	60197	Roman road, Wansdyke to Bath, Bath
7	66999	The Fosse Way, Roman road
8	62083	Roman quarry, S of Bloomfield Road, Bath
9	61505	Roman coffin find, south of Hansford Square, Combe Down, Bath
10	62096	Four roman coins from 12 Hawthorne Grove, Combe Down
11	61988	Roman coffin find, Englishcombe Lane, Bath
12	61987	Roman cemetery, English Combe Lane and Perrymead, Bath
13	61986	Roman stone coffin, Englishcombe Lane, Bath
14	61989	Roman finds, Devonshire Cottage, 70, Wellsway, Bath
15	63124	Section of the Fosseway, Severcombe to Odd Down
16	61497	Roman coffins, E of Vernham Wood, Bath
17	62726	Roman coin, Odd Down, Bath
18	66867	Berwick medieval settlement, nr. Wellsway Road, Bath
19	63113	Section of the West Wansdyke, Vernham Wood to Odd Down, Englishcombe
20	63114	Section of the West Wansdyke, E from Burnt House, Bath
21	62088	Medieval silver penny
22	62031	Medieval Scottish Coin, Englishcombe Way, Bath
23	60200	Medieval or Post medieval gibbet, Odd Down, Bath
24	66902	Medieval wood bank, Hoggen Coppice, Englishcombe
25	60109	Stirlingdale Farm, N of Odd Down, Bath
26	62089	Medieval ridge and furrow, Moorlands School Playing Field, Bath
27	68631	110a, and Presbytery to the RC Church of St Peter and St Paul, 112, Entry Hill, Combe Down
28	68600	Newfield, Entry Hill Drive, Combe Down
29	68601	The Lodge, Entry Hill Drive, Combe Down
30	68629	Bladud, 54, Entry Hill, Bath
31	60606	Westfield Farm, Bloomfield Road, Lyncombe
32	60591	Entry Hill Viaduct, Lyncombe Vale, Bath
33	70143	The Old Vicarage, Hatfield Road, Bath
34	69858	19th Century tunnel under Frome Road, Odd Down
35	60085	Bath Union Workhouse Cemetery, Wellsway, Odd Down
36	61085	St Martin's Chapel, Midford Road, Bath
37	62011	Nineteenth century paupers burial ground, St. Martin's Hospital, Bath
38	67144	Seventeenth century glass house, nr. Midford Road and Frome Road, Bath
39	63484	St Martin's Hospital (Former Bath Union Workhouse), Milford Road, Bath
40	63025	Glasshouse (site of)
41	69913	Post medieval mill stream supplying Upper Widcombe Mill, Bath
42	68620	64 to 72, Entry Hill, Combe Down
43	68621	58, Entry Hill, and 2, Entry Hill Park, Combe Down
44	60105	Barracks Farm, Wellsway, Bath
45	67304	Springfield Quarry, Combe Down, Bath
46	68610	Devonshire Cottage, 70, Wellsway, Bath
47	67759	199 to 205, Devonshire Terrace, Wellsway, Bath
48	68609	61, Hatfield House and 2, Hatfield Place, Lyncombe
49	68608	Hatfield Cottage, Hatfield Road, Bath
50	68605	27 to 47, Entry Hill, Bath
51	68614	Westfield Lodge, 196, Bloomfield Road, Lyncombe
52	68613	Westfield House, 172, Bloomfield Road, Lyncombe
53	68612	Westfield Cottage, 150, Bloomfield Road, Lyncombe
54	68611	Bloomfield House, 146, and 148, Bloomfield Road, Lyncombe
55	67113	Granville House, Entry Hill Drive, Combe Down
56	63156	Nineteenth century Fullers earth works, Wansdyke, Odd Down, Bath
57	70193	19th Century boundary post N of Odd Down Roundabout, Fosse Way, Combe Hay
58	69792	19th and 20th Century boundary posts at junction with Combe Hay Lane, Wellsway, Bath
59	70248	St Philip and St James Church, Frome Road, Odd Down, Bath

ODD DOWN SPORTS PAVILION, CHELWOOD DRIVE, ODD DOWN, BATH

60	70247	St Phillip's Church of England Primary School, Frome Road, Odd Down, Bath
61	68348	19th Century workers' housing, 378 and 380, Bloomfield Road, Bath
62	60235	Congregational chapel, 382 Bloomfield Road, Bath
63	68617	Tower House, 297, Bloomfield House, Bath
64	60115	The Red Lion, site of
65	64106	Rush Hill Farm site
66	68630	Red Lion Hotel, Frome Road, Odd Down, Bath
67	68619	372 and 374, Wellsway, Bath
68	68618	Rose Cottage, 1, Old Fosse Road, Bath
69	60108	The Moorlands, Englishcombe Lane, Bath
70	68616	Wakefield Cottage, 260, Bloomfield Road, Lyncombe
71	68615	262 and 264, Bloomfield Road, Bath
72	62342	Bloomfield Crescent, Bath
73	70108	Saints Peter and Paul Catholic Church, Bradford Road, Combe Down
74	62012	Emergency Medical Services Hospital, Midford Road (Now part of St Martin's Hospital)
75	64078	Anti-aircraft battery
76	67303	Second World War heavy anti aircraft battery, South Store, Bath
77	60178	Rush Hill United Reformed Church, Frome Road, Odd Down, Bath
78	62090	Stone surface
79	61003	Mine shaft at Sulis Meadows

ODD DOWN SPORTS PAVILION, CHELWOOD DRIVE, ODD DOWN, BATH

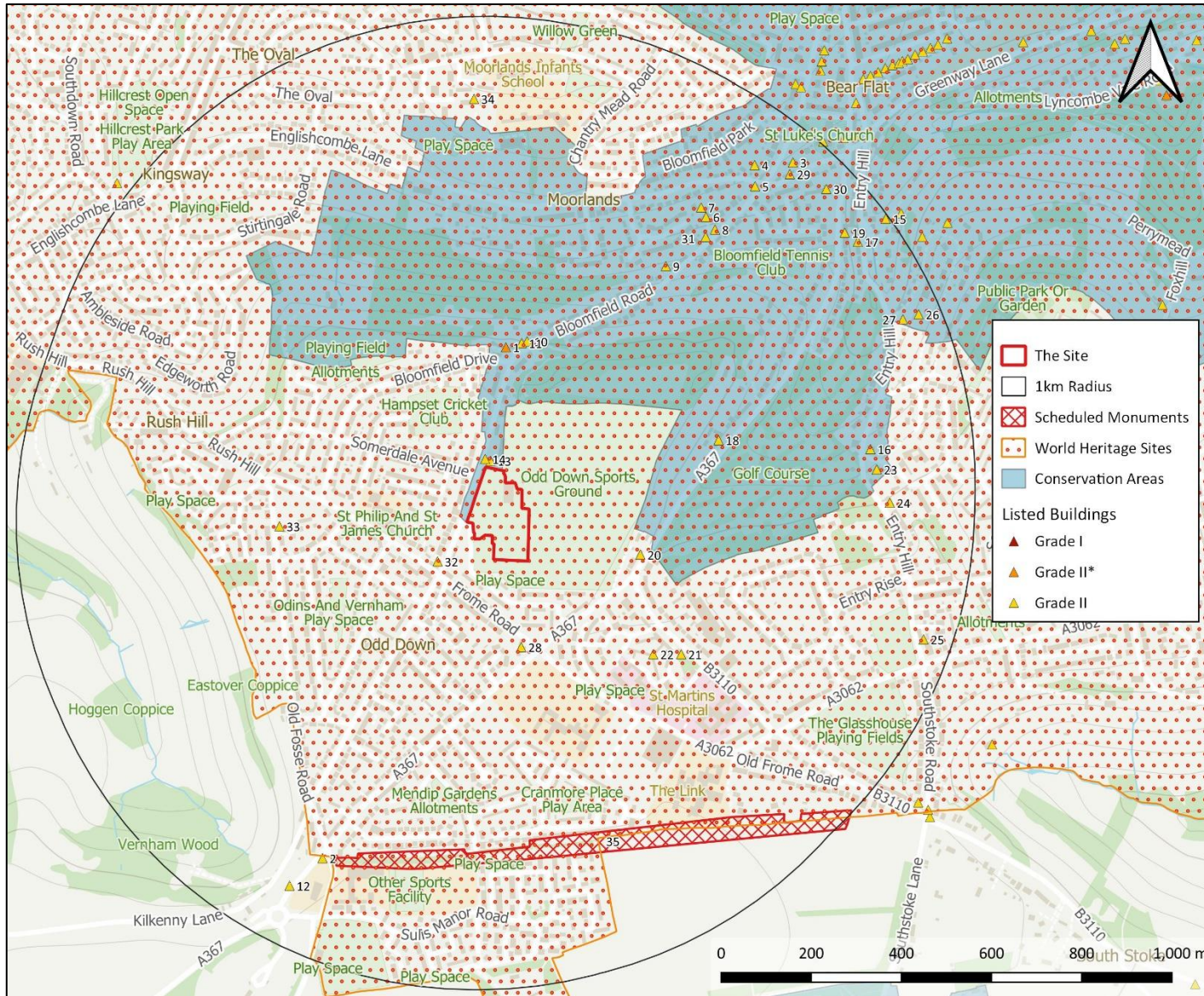


FIGURE 9: DESIGNATED HERITAGE ASSETS WITHIN 1KM OF THE PROPOSAL AREA RECORDED IN THE NATIONAL HERITAGE LIST FOR ENGLAND (NHLE) © HISTORIC ENGLAND 2023. CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2023. THE MOST PUBLICLY AVAILABLE UP TO DATE HISTORIC ENGLAND GIS DATA CAN BE OBTAINED FROM [HTTP://HISTORICENGLAND.ORG.UK](http://historicengland.org.uk).

TABLE 3: DETAILS OF DESIGNATED HERITAGE ASSETS SHOWN IN FIGURE 9 (HE)

No	List Entry	Name	Grade
1	1394793	Bloomfield Crescent Nos. 1-7 (Consec) Including Gate Piers	II*
2	1320808	Group Of 3 Boundary Posts On A367,At Junction With Combe Hay Lane,At National Grid Reference St 7345 6187	II
3	1394774	Hatfield House	II
4	1394780	Bloomfield House	II
5	1394781	Westfield Cottage, With Boundary Walls And Gateway	II
6	1394782	Westfield House	II
7	1394784	Terrace Balustrades And Staircases At No. 172 Westfield House	II
8	1394785	Boundary Wall With Piers And Gateways To Front Of No. 172 Westfield House	II
9	1394788	204, Bloomfield Road	II
10	1394790	Wakefield Cottage, With Boundary Wall	II
11	1394791	262 And 264, Bloomfield Road	II
12	1313025	Boundary Post On A367 At National Grid Reference St 7338 6167	II
13	1394940	Tower House	II
14	1394941	Boundary Wall, Piers And Gate To No. 297	II
15	1395162	Lynbrook Cottage	II
16	1395436	No. 54 Bladud, With Boundary Wall, Gateway And Water Trough	II
17	1395439	Nos. 27-47 (Odd) With Retaining Wall And Steps	II
18	1395628	Nos. 172 And 172a Wellbourne Cottage (No. 172)	II
19	1395630	199-205, Wellsway	II
20	1395631	Nos. 372 And 374 With Retaining Wall, Railings And Steps	II
21	1395713	Chapel Of St Martin	II
22	1395717	St Martin's Hospital	II
23	1395732	Wildacre	II
24	1395733	64-72, Entry Hill	II
25	1395736	110a And 112 Entry Hill (The Presbytery To The RC Church Of St Peter And St Paul)	II
26	1395740	Newfield	II
27	1395741	The Lodge	II
28	1395821	Red Lion Hotel	II
29	1395972	Hatfield Cottage	II
30	1396450	Devonshire Cottage	II
31	1406035	Westfield Lodge	II
32	1406038	378 and 380 Bloomfield Road and attached railings	II
33	1406152	Rose Cottage (No.1)	II
34	1406165	The Moorlands (also known as Englishcombe Court, The Moorlands)	II
35	1007003	Wansdyke: section 1230yds (1120m) eastwards from Burnt House Inn	SM

ODD DOWN SPORTS PAVILION, CHELWOOD DRIVE, ODD DOWN, BATH

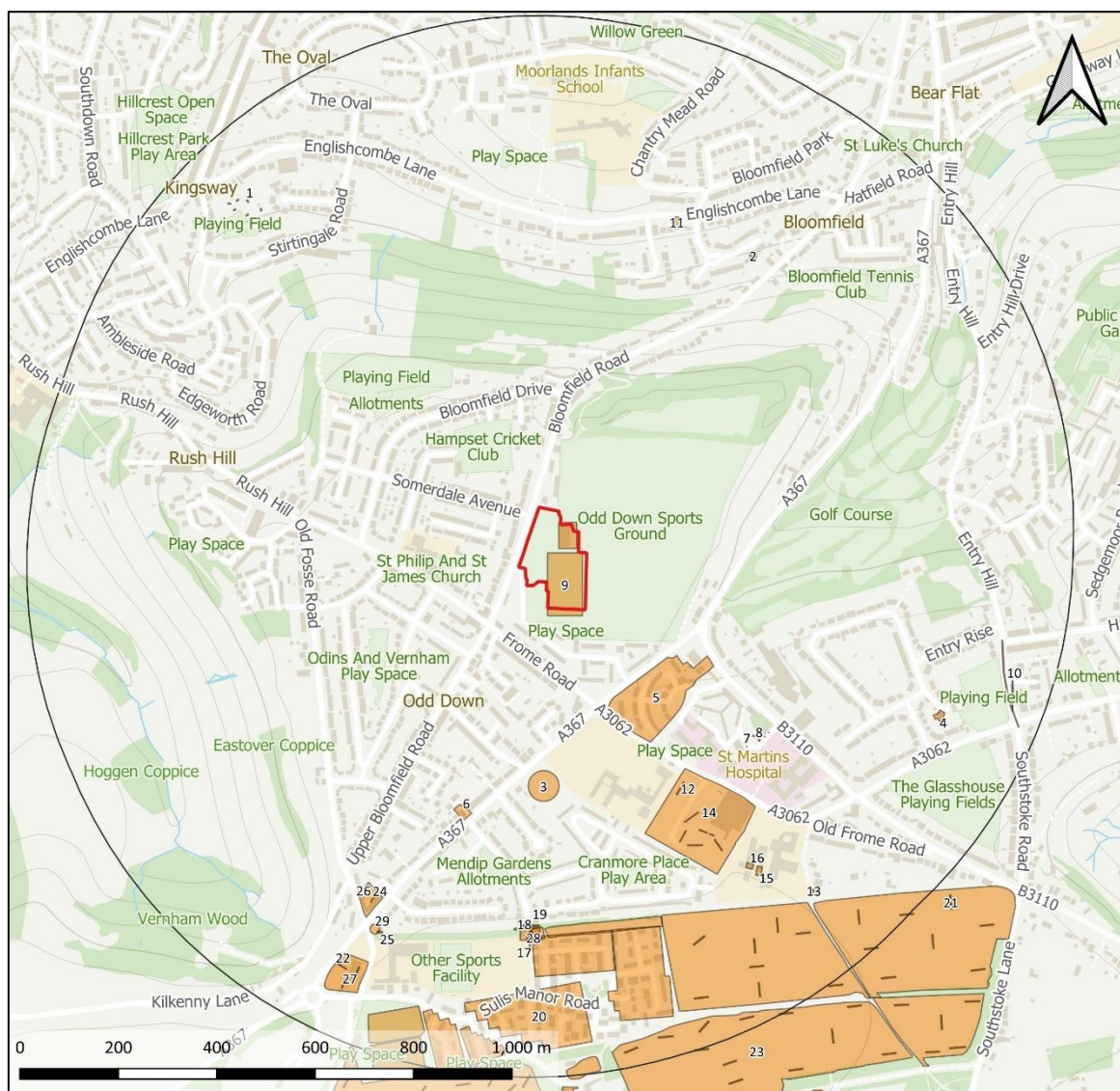


FIGURE 10: ARCHAEOLOGICAL INTERVENTIONS WITHIN 1KM OF THE PROPOSAL AREA RECORDED IN THE BANES HER CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2023.

TABLE 4: DETAILS OF ARCHAEOLOGICAL INTERVENTIONS SHOWN IN FIGURE 10 (BANES HER)

No	PRN No	Archaeological Intervention
1	66051	Archaeological evaluation (2016), Englishcombe Lane, Southdown
2	65110	Watching brief (2004), 17 Westfield Close, Bath
3	69857	Geophysical Survey (2022), Bath Union Workhouse Cemetery, Wellsway, Odd Down
4	65977	Watching brief (2018), 6 Hill avenue, Combe Down, Bath
5	65316	Watching brief (2006), St Martin's Hospital, Bath
6	65071	Watching brief (2006), nos. 534-538 Wellsway, Bath
7	65050	Watching brief (2004), St. Martins Hospital, Bath
8	66460	Archaeological evaluation (2019) St. Martins Hospital, Bath
9	65712	Watching brief (2014), Odd Down Playing Fields, Bath
10	65548	Watching brief (2012), Entry Hill, Bath
11	65044	Watching brief (1993), Englishcombe Lane, Bath
12	65403	Archaeological evaluation (2010), Odd Down, Bath
13	65367	Watching brief (2009), No. 182 Old Frome Road, Bath
14	65368	Geophysical survey (2009), Odd Down playing fields, Bath
15	65177	Watching brief (2007), the Link School, Bath
16	65415	Watching brief (2011), the Link School, Bath
17	64775	Archaeological evaluation (1992), the Wansdyke at Odd Down, Bath
18	67983	Watching brief (1996), Fosse Gardens, Wansdyke, Bath
19	67982	Watching brief (1997), Fosse Gardens, Wansdyke, Bath

20	67904	Geophysical survey (1993), Odd Down, Bath
21	65833	Evaluation (2015), Combe Hay Lane, Odd Down, Bath
22	65613	Watching brief (2012), St Gregory's School, Combe Hay
23	65676	Geophysical survey (2014), Odd Down, Bath
24	65004	Watching brief (2003), New Burnt House Inn, Bath
25	67788	Watching brief (1987), 727 Wellsway Odd Down, Bath
26	65171	Watching brief (2007), New Burnt House, Bath
27	65430	Archaeological evaluation (2009), St. Gregory's Sixth Form Centre, Bath
28	67981	Watching brief (2005), Fosse Gardens, Wansdyke, Bath
29	68304	Watching brief (2020), no. 727 Wellsway, Bath

3.2 AERIAL PHOTOGRAPHY

A review of readily available aerial photographs shows the site in 1999 and 2021. The new pavilion and sports facilities were constructed in 2015 and the aerial photographs show the rest of the site in use as sports pitches both before and after this date.



FIGURE 11: AERIAL PHOTO OF THE SITE FROM 1999; ©2023 INFOTERRA LTD AND BLUESKY. THE APPROXIMATE SITE IS INDICATED.



FIGURE 12: AERIAL PHOTO OF THE SITE FROM 2021; ©GOOGLE. THE APPROXIMATE SITE IS INDICATED.

LiDAR data has not been examined as it is not relevant in this instance due to the extensive modern landscaping of the site.

3.3 WALKOVER SURVEY

A walkover survey of the site was undertaken on the 28th June 2023 in overcast and dry conditions. The site comprised part of a large open sports field and a strip of land to the west of the existing sports pitches.

Site description

The western part of the site consists of a strip of ground laid to grass with a line of recently felled trees running north south along its length, adjacent to a sports pitch enclosed with metal mesh fencing. A path runs parallel on the eastern side of the strip but down a very slight slope, suggesting the material forming the grass strip has either been slightly banked up during the construction of the sports pitch to the east or else the ground has been cut into to create the sports pitches and path. The surrounding ground is tarmacked as a car park.

The eastern part of the site consists of part of a large open sports field to the immediate east of the existing pavilion building. A patio area has been created to the east of the pavilion to provide seating for the small café facility located on this side of the building. The field appeared largely to be used for dog walking at the time of the walkover survey, which was undertaken early afternoon on a weekday. The ground appeared level across the site areas with no visible earthworks except level changes where the sports pitch to the south met the patio area.



FIGURE 13: WESTERN PART OF THE SITE, VIEWED FROM THE SOUTH



FIGURE 14: EASTERN PART OF THE SITE, FROM THE SOUTH WEST.

3.4 ARCHAEOLOGICAL POTENTIAL AND IMPACT SUMMARY

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

The site may have the potential to encounter buried archaeological remains relating to buildings, structures or boundaries previously located within the proposed development area. The HER shows the possible route of a Roman Road crossing the site and Prehistoric, Roman and Medieval occupation is noted in the vicinity of the site. It is unknown however to what extent the ground comprising the site was disturbed as part of the construction of the existing sports facilities on the site. The archaeological potential of the site is unknown but is considered likely to be relatively low. Damage to archaeological deposits would be considered **permanent/irreversible**. Mitigation in the form of archaeological monitoring and recording would be appropriate for this site.

TABLE 5: SUMMARY OF DIRECT IMPACTS.

Asset	Type	Distance	Value	Magnitude of Impact	Assessment	Overall Assessment
Direct Impacts						
Unidentified archaeological features	Non-deg.	On site	Unknown but low to negligible	Moderate	Neutral/slight to Slight Adverse	Negligible Adverse

4.0 INDIRECT IMPACTS

4.1 STRUCTURE OF THE ASSESSMENT

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

The methodology adopted in this document is based on that outlined in *The Setting of Heritage Assets* (GPA3 2nd edition, Historic England 2017), with reference to ICOMOS (2011) and National Highways (DMRB LA 104, 2020) guidance. Two assessments are provided. The first is arrived at by the objective application of DRMB Table 3.8.1 (i.e. environmental value and degree of change determines the significance of effect). The second applies a negligible/minor/moderate/major scale (derived from DRMB Table 3.4N, and which can be correlated with the NPPF substantial/less than substantial scale) based on the professional judgement of the author. The latter assessment is a more subjective one, but, as the term implies, applies the knowledge, skills, and experience of the author in a way that is informed by professional standards, laws, and ethical principles to provide a considered, fair, and impartial assessment as to the likely impact of the proposed development. Appendix 4 goes into greater depth regarding the methodology employed.

This report follows the staged approach to proportionate decision making outlined in *The Setting of Heritage Assets* (Historic England 2017, 6). *Step one* is to identify the designated heritage assets that might be affected by the development. The first stage of that process is to determine an appropriate search radius, and this would vary according to the height, size and/or prominence of the proposed development. For instance, the search radius for a wind turbine, as determined by its height and dynamic character, would be much larger than for a single house plot or small agricultural building. The second stage in the process is to look at the heritage assets within the search radius and assign to one of three categories:

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

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

4.2 QUANTIFICATION

A 1km radius has been considered suitable for the assessment of any likely impacts upon heritage assets as a result of the proposed development. There are 34 Listed Buildings (1 Grade II*), one scheduled monument, one Conservation Area and the City of Bath World Heritage Site (which has two UNESCO inscriptions) within 1km of the site. There are no Registered Parks and Gardens or

Registered Battlefields within 1km of the site. All except the Bath Conservation Area, Grade II Listed Tower House and City of Bath World Heritage Site were scoped out of the assessment following the site visit. Based on perceived value and location relative to the site, these have been treated as *Category #1* assets. All other designated heritage assets within the vicinity of the site were scoped out of the assessment following a site visit due to the lack of visibility of the site to and from their locations as a result of topography and screening effects of other structures.

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

- Category #1 assets: Bath Conservation Area, Grade II Tower House, City of Bath World Heritage Site
- Category #2 assets: None

4.3 IMPACT BY CLASS OF MONUMENT OR STRUCTURE

4.3.1 LISTED COTTAGES AND STRUCTURES WITHIN HISTORIC SETTLEMENTS

Clusters of Listed Buildings within villages or hamlets; occasionally Conservation Areas

The context of the (usually) Grade II Listed buildings within settlement is defined by their setting within the village settlement. Their significance is determined by their architectural features, historical interiors or role/function in relation to the other buildings. The significance of their setting to the experience of these heritage assets is of key importance and for this reason the curtilage of a property and any small associated buildings or features are often included in the Listing and any changes must be scrutinised under relevant planning law.

Most village settlements have expanded significantly during the 20th century, with rows of cottages and modern houses and bungalows being built around and between the older 'core' Listed structures. The character of the settlement and setting of the heritage assets within it are continually changing and developing, as houses have been built or farm buildings have been converted to residential properties. The setting of these heritage assets within the village can be impacted by new residential developments especially when in close proximity to the settlement. The relationships between the houses, church and other Listed structures will not be altered, and it is these relationships that define their context and setting in which they are primarily to be experienced.

The larger settlements and urban centres usually contain a large number of domestic and commercial buildings, only a very small proportion of which may be Listed or protected in any way. The setting of these buildings lies within the townscape, and the significance of these buildings, and the contribution of their setting to that significance, can be linked to the growth and development of the individual town and any associated industries. The original context of any churches may have changed significantly since construction, but it usually remains at the heart of its settlement. Given the clustering of numerous individual buildings, and the local blocking this inevitably provides, a distant development is unlikely to prove particularly intrusive.

What is important and why

Historic settlements constitute an integral and important part of the historic landscape, whether they are hamlets, villages, towns or cities. The physical remains of previous occupation may survive beneath the ground, and the built environment contains a range of vernacular and national styles (evidential value). Settlements may be archetypal, but development over the

course of the 20th century has homogenised most, with streets of terraced and semi-detached houses and bungalow growths arranged around the medieval core (limited historical/illustrative value). As dynamic communities, there will be multiple historical/associational values relating to individuals, families, occupations, industry, retail etc. in proportion to the size and age of the settlement (historical/associational). Settlements that grew in an organic fashion developed fortuitously into a pleasing urban environment (e.g. Ledbury), indistinguishable suburbia, or degenerate urban/industrial wasteland (aesthetic/fortuitous). Some settlements were laid out quickly or subject to the attention of a limited number of patrons or architects (e.g. late 19th century Redruth and the architect James Hicks, or Charlestown and the Rashleigh family), and thus strong elements of design and planning may be evident which contribute in a meaningful way to the experience of the place (aesthetic/design). Component buildings may have strong social value, with multiple public houses, clubs, libraries (communal/social), chapels and churches (communal/spiritual). Individual structures may be commemorative, and whole settlements may become symbolic, although not always in a positive fashion (e.g. the Valleys of South Wales for post-industrial decline) (communal/symbolic). Settlements are complex and heterogeneous built environments filled with meaning and value; however, beyond a certain size threshold distant sight-lines become difficult and local blocking more important.

Almost every village or town will have a public house, usually several. They may have been specially constructed perhaps by a landowning industrialist as a means of profiting from travellers or his own workforce; or arose organically, being converted from a residential property. Their setting is often local in character, along thoroughfares with a clear concern for visibility from the road. An important facet of these buildings is its communal value: places where disparate elements of the population could meet and serving as a focus for local sentiment.

Asset Name: Bath Conservation Area	
<i>Parish:</i> City of Bath	<i>Value:</i> Medium
<i>Designation:</i> CA	<i>Distance to Development:</i> 0m
<p><i>Summary:</i> The site lies immediately adjacent to the boundary of the Bath Conservation Area. This has been broken down into 16 component parts for the purposes of Conservation Area Appraisals and the element the site lies adjacent to forms part of the 'Entry Hill, Perrymead and Prior Park Character Area' of the Bath Conservation Area. The following describes the section of the character area immediately adjacent to the site (BANES 2018)</p> <p><i>d. Entry Hill and Wellsway to Bloomfield Road</i> <i>The eastern boundary of this sub-area is Entry Hill, the ancient route from Bath to South Stoke which climbs south from Bear Flat to reach the plateau between Odd Down and Combe Down. Wellsway and Bloomfield Road fan out to the west from the same start point, taking similar routes up the hillside. Housing here forms ribbons along the major roads and is mainly of the late 19th or 20th century. Between Entry Hill and Wellsway a fold in the hillside (formed by the Lyn brook running north from its spring) forms a green open space which is now a nine-hole golf course. The triangle of open ground west of Wellsway towards Bloomfield Road is known as The Tumps. Woodland occupies the steeply sloping northward end. The flatter green space to the south adjacent to Odd Down playing fields is now occupied by a BMX cycle track. At the crest of Bloomfield Road is Bloomfield Crescent, a modest ensemble of the 1790s, indicating how pressure on housing in the city spawned attempted developments in adjacent rural areas. The southern boundary of this sub-area runs south of Bloomfield Park and St Luke's church; the housing here is largely c. 1870 to 1910, an example of the characteristic expansion of Bath with mid-sized detached and semi-detached villas to form desirable leafy suburbs.</i></p>	
<p><i>Conservation Value:</i> Bath is a large Conservation Area with high conservation value vested in a number of attributes which include evidential value within its buildings and in below ground deposits, particularly its Roman archaeology. Historical illustrative value is vested in its buildings, which tell the narrative of the settlement's development. Many buildings have a strong aesthetic value and as a whole the settlement has historical associational value through its links with prominent families and architects.</p>	

<p><i>Principle Views:</i> Principle views were identified in the Conservation Area character area appraisal but do not include any views towards Odd Down Sports Ground.</p>
<p><i>Setting:</i> The setting of the Conservation Area is its defined area and the areas immediately adjacent to its boundaries and its views outwards to the landscape around the settlement.</p>
<p><i>Likely Effects:</i> The proposed development is just outside the boundary of the Conservation Area and involves construction of an extension to the sports pavilion on the eastern side and construction of Padel Tennis Courts with canopy on the western side. The development on the eastern side would be largely screened from the Conservation Area by the existing building, with the only visibility being from the north, comprising the rear of a number of residential properties (addressed separately). The Padel Tennis Courts would be constructed to the west of the current sports pitch with a proposed canopy over, giving a height of c.9m, which is higher than the adjacent pavilion building. The removal of the mature trees in this location has opened up the site and although screened from the Conservation Area to the west by trees which were in leaf at the time of the site visit, these appeared to be of a deciduous nature and therefore would not provide year round screening.</p>
<p><i>Contribution of Setting to the Significance of the Asset:</i> The setting of the Conservation Area extends into the area immediately around it which includes the green, leafy entrance to Odd Down Sports Ground. This enables a greater appreciation of the entrance into the Conservation Area at this point on Bloomfield Road rather than being a detracting element.</p>
<p><i>Magnitude of Impact:</i> The proposed development will expand the pavilion building to the east, although this will be largely screened from the Conservation Area as a result of the scale of the development and screening provided by the existing building. The Padel tennis courts to the east of the existing building and sports pitch will comprise similar fencing to the adjacent sports pitch however the proposed canopy extending to a height of c.9m is likely to be highly visible as it will be higher than the adjacent pavilion and composed of white plastic, particularly when the trees at the entrance to the sports centre are not in leaf and therefore is likely to have a larger impact on the appreciation of the Conservation Area and its setting. There may be some increased aural intrusion from use of external sports facilities and additional traffic movements associated with people arriving and departing by vehicle.</p>
<p><i>Overall Impact Assessment:</i> Moderate Adverse</p>

Asset Name: Tower House, 297 Bloomfield Road	
<i>Parish:</i> City of Bath	<i>Value:</i> Medium
<i>Designation:</i> Grade II Listed	<i>Distance to Development:</i> 8m
<p><i>Summary:</i> Detached house, reputedly for quarry owner. Mid C19. MATERIALS: Limestone ashlar, double Roman tile roof. EXTERIOR: Symmetrical two storey villa, with, to rear left, three storey square tower. Front has three windows, all four pane sashes, to sill band at first floor, central two panel door with transom light under gabled porch with Roman Doric columns carrying stone gable and barge board. Above windows are paired small stone eaves brackets, and main gable ends have deep eaves with decorative pierced bargeboards. Tower, with cornice and parapet, has plain sash to each face and at each level. INTERIOR: Not inspected. HISTORY: The tower, a good example of a belvedere built to exploit the fine prospects, is thought to have enabled quarry owner to supervise operations in his adjacent quarry.</p>	
<p><i>Conservation Value:</i> The building has evidential value within its fabric. It has historical illustrative value as part of the development of Bath and its suburbs in the 19th century and has a strong aesthetic value. It may have historical associational value with the quarries adjacent and their owner.</p>	
<p><i>Principle Views:</i> Views to the building are from Bloomfield Road and from the sports field within Odd Down Sports Ground. The building was clearly designed to have views out from its tower to the surrounding landscape.</p>	
<p><i>Setting:</i> The setting of the building is its defined area including garden and the areas immediately adjacent to its boundaries and its views outwards to the north east, east and south east.</p>	
<p><i>Likely Effects:</i> The proposed extensions to the pavilion and construction of Padel Tennis Courts will be visible from the tower of the building. Whilst its original setting and views have been largely lost through the development of the sports centre in this area, the development would represent further</p>	

encroachment on those views, particularly if the height of any new additional elements extends above the current roof lines of the existing development. There may be some increased aural intrusion from use of external sports facilities and additional traffic movements associated with people arriving and departing by vehicle.

Contribution of Setting to the Significance of the Asset: The Tower House was clearly constructed for its views outwards as its name implies, its tower being on its rear, eastern elevation with windows providing views out to the north, south, east and west. Its immediate landscape setting is therefore of importance in understanding the significance of this asset and the reasons for its construction.

Magnitude of Impact: The proposed development will expand the pavilion building to the east, is likely to have some visibility from the Tower House, although the proposed build design, matching the existing pavilion in elevation and materials should make it less visually obtrusive. The Padel tennis courts to the east of the existing building and sports pitch with a proposed canopy of white plastic construction extending to a height of c.9m is likely to be visible and eye catching from the Tower House and comprise another visually intrusive element in the setting of this listed building.

*Overall Impact Assessment: **Moderate Adverse***

4.3.2 WORLD HERITAGE SITE

The proposed site lies in the City of Bath World Heritage Site. The site itself does not clearly represent any of the six attributes of the Outstanding Universal Value (OUV) of the WHS, for which it was inscribed, with the possible exceptions of *1. Roman Archaeology*, if it were determined that the course of the Wansdyke to Bath Roman Road did cross the area of the site and *5. The green setting of the City in a hollow in the hills*. The pavilion extension is considered a relatively visually unobtrusive development, in keeping with the existing sports facility and the Padel tennis courts themselves could be relatively unobtrusive however the proposed canopy represents a strong visual element in this area of the WHS which is likely to have visibility in its surroundings due to its proposed height. The development also covers the area of a possible Roman Road. It is therefore considered to have a moderate impact on the WHS.

4.3.3 SITE SPECIFIC IMPACT

Whilst the designated assets within the vicinity of the site have been considered above, the cottages (289-295 Bloomfield Road, also known as Crescent Cottages on some historic mapping; however this name is given to Bloomfield Crescent on late 18th century historic mapping) appear on a late 18th century map of the parish, although not on a mid 18th century map, suggesting they are of mid-late 18th century origin although potentially significantly extended. Their integrity and authenticity is unknown but they could be considered to be of equal value and significance to a Grade II Listed building. The western development (Padel Tennis Courts) is considered likely to have no visibility from these buildings and aural intrusion is likely to be very limited. There may be some limited visibility of the proposed pavilion extension, further eroding the open views which would have formed the setting of these buildings for two centuries however they appear likely to have been constructed as workers dwellings, and therefore do not derive their significance from their views outwards into the wider landscape, which are largely incidental. As such the impact of the proposed development on these structures has been considered to be negligible.

4.3.4 HISTORIC LANDSCAPE - GENERAL LANDSCAPE CHARACTER

The landscape of the British Isles is highly variable, both in terms of topography and historical biology. Natural England has divided the British Isles into numerous 'character areas' based on topography, biodiversity, geodiversity and cultural and economic activity. The County Councils and AONBs have undertaken similar exercises, as well as Historic Landscape Characterisation.

Some character areas are better able to withstand the visual impact of development than others. Rolling countryside with wooded valleys and restricted views can withstand a larger number of

sites than an open and largely flat landscape overlooked by higher ground. The English landscape is already populated by a large and diverse number of intrusive modern elements, e.g. electricity pylons, factories, modern housing estates, quarries, and turbines, but the question of cumulative impact must be considered. The aesthetics of individual developments is open to question, and site specific, but as intrusive new visual elements within the landscape, it can only be **adverse**.

The proposal site lies in an area classified as *Post Medieval (18th -19th century) parliamentary enclosure* in the Avon Historic Landscape Characterisation. Unsympathetic development in this area has the potential to harm the landscape character of this area, which is designated a World Heritage Site and adjacent to a Conservation Area. Some mitigation through screening may be possible although consideration of the design, scale and proportion of any development in relation to the designated heritage assets would be the most appropriate strategy. Odd Down appears to have been used for recreational purposes since the development of the surrounding area in the early 20th century and prior to that had been agricultural land. The overall effect on the historic landscape is likely to be **Minor Adverse**.

4.3.5 AGGREGATE IMPACT

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

Based on the restricted number of assets where any appreciable effect is likely, the aggregate impact of this development is **negligible** and significance of effects is **Neutral/Slight**. There is the potential for some constructional phase impacts on the heritage assets in closest proximity to the proposed development, predominately in the increased aural intrusion.

4.3.6 CUMULATIVE IMPACT

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

The Setting of Heritage Assets 2011a, 25

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

GLVIA 2013, 123

An assessment of cumulative impact is, however, very difficult to gauge, as it must take into account existing, consented and proposed developments. The threshold of acceptability has not, however, been established, and landscape capacity would inevitably vary according to landscape character. A limited number of minor developments are proposed or have been undertaken in this area. The cumulative impact of this development is considered **minor adverse**.

4.3.7 INDIRECT IMPACT SUMMARY

Table 6 (below) provides a summary of the likely impact of the proposed development on both category #1 and category #2 heritage assets. As with the individual assessments (above), this table presents the results of both the likely significance of effect *and* our professional judgement as to the likely impact of the proposed development (as per Tables 3 and 4 in Appendix 4; the

significance of effect is colour-coded as per Table 4). These assessments are for the operational function of the proposed development; constructional impacts are generally short-lived (if more intense) and outside of renewables, most developments have a degree of permanence.

TABLE 6: SUMMARY OF IMPACTS AND EFFECTS

Asset	Type	Distance	Value	Scale of Change	Significance of Effect	Professional Judgement
Category #1 Assets						
Tower House	GII	8m	Medium	Moderate	Moderate adverse	Moderate adverse
City of Bath World Heritage Site	GII	Within	Very High	Moderate	Large/Very Large adverse	Moderate adverse
Bath Conservation Area	CA	<1m	Medium	Moderate	Moderate adverse	Moderate adverse
Category #2 assets						
None						
Landscape Character						
Historic Landscape	n/a	n/a	Medium	Minor	Slight	Minor Adverse
Aggregate Impact	n/a	n/a				Negligible Adverse
Cumulative Impact	n/a	n/a				Minor Adverse

4.3.8 RECOMMENDATIONS AND MITIGATION

It is recommended that any proposals for development at Odd Down Sports Ground retain the open character of the playing fields. The proposals for extensions to the pavilion building are in keeping with the scale and design of the current building. The Padel tennis courts could be more in keeping with the present, low impact sports pitch design if they did not have a canopy roof of solid form, extending in height above the present structures on the site. Alternatively it may be possible for the canopy to be of a less visually obtrusive (non white) material. The courts are proposed to have mesh type fencing as the adjacent sports pitch, which is more visually recessive.

5.0 CONCLUSION

Odd Down historically lay in the parish of Lyncombe with Widcombe, formed from two separate parishes in the mid-19th century. Odd Down appears to have lain within Lyncombe parish. Lyncombe was documented as a relatively large manor at Domesday, held by the Abbey of Bath, who had also held the manor in 1066. The manor was purchased by Hugh Sexey in the early 17th century, following the dissolution of the monasteries in the mid-16th century. The land on which Odd Down Sports Ground sits appears to have been part of the holding of Barracks Farm during the 18th and 19th centuries, changing ownership during this period. The Conservation Area Character Area appraisal for this part of the Bath Conservation Area notes that Barrack is a corruption of Berewyke, taken from the de Berewyke family who held a free tenement in this area in the 13th century. The lost Medieval settlement of Berewyke is believed to lie around the former location of Barrack/Lower Barrack Farm and Lower Barrack farmhouse, demolished in the 1970s is believed to have comprised the last element of the medieval settlement (BANES 2018).

Limited archaeological investigation has been carried out on the site and its immediate surroundings. A watching brief was carried out during the construction of the current sports centre in 2014 which encountered no archaeological deposits or features. There are 34 Listed Buildings (1 Grade II*), one scheduled monument, one Conservation Area and the City of Bath World Heritage Site (which has two UNESCO inscriptions) within 1km of the site. There are no Registered Parks and Gardens or Registered Battlefields within 1km of the site.

The impact on heritage assets within the vicinity of the proposed development has been considered. The location of the site within the City of Bath World Heritage Site, adjacent to the Bath Conservation Area means that any development would need to be appropriate in design, scale and proportion to retain the significance of these assets and their settings. The proposed canopy for the Padel tennis courts is the main detracting element of the design, its relative scale and materials likely to have an impact on the appreciation of the significance of these heritage assets. With this in mind, the overall impact of the proposed development has been assessed as **Moderate Adverse**. The impact of the development on any buried archaeological resource may be **permanent** and **irreversible** but is considered to have low-moderate archaeological potential.

6.0 BIBLIOGRAPHY & REFERENCES

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APPENDIX 1: SUPPORTING PHOTOGRAPHS



1. LOCATION OF PROPOSED EXTENSION TO THE PAVILION FROM THE SOUTH WEST (NO SCALE).



2. AREA OF PROPOSED PAVILION EXTENSION LOOKING EASTWARDS. FROM THE WEST (NO SCALE).



3. VIEW TO THE SOUTH FROM THE PROPOSED PAVILION EXTENSION LOCATION (NO SCALE).



4. THE PRESENT PAVILION BUILDING LOOKING NORTH WEST TO TOWER HOUSE AND CRESCENT COTTAGES (NO SCALE).



5. VIEW FROM REAR OF TOWER HOUSE BOUNDARY TOWARDS PAVILION. FROM THE NORTH WEST (NO SCALE).



6. VIEW FROM BLOOMFIELD ROAD TOWARDS PAVILION BUILDING. FROM THE SOUTH WEST (NO SCALE).



7. VIEW FROM SOUTH OF SPORTS PITCH LOOKING NORTH. FROM THE SOUTH (NO SCALE).



8. VIEW SOUTH ALONG AREA OF PROPOSED PADEL TENNIS COURTS. FROM THE NORTH (NO SCALE).



9. VIEW SOUTH ALONG AREA OF PROPOSED PADEL TENNIS COURTS FROM THE CAR PARK. FROM THE NORTH (NO SCALE).



10. TOWER HOUSE VIEWED FROM ODD DOWN SPORTS GROUND CAR PARK. FROM THE SOUTH EAST (NO SCALE).



11. FRONT ELEVATION OF TOWER HOUSE FROM BLOOMFIELD ROAD (NO SCALE).



12. VIEW SOUTH ALONG BLOOMFIELD ROAD FROM ENTRANCE TO ODD DOWN COMPRISING SOUTHERN EXTENT OF CITY OF BATH CONSERVATION AREA (NO SCALE).

APPENDIX 2: IMPACT ASSESSMENT METHODOLOGY

Heritage Impact Assessment - Overview

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

National Policy

General policy and guidance for the conservation of the historic environment are now contained within the *National Planning Policy Framework* (Department for Communities and Local Government 2012 revised 2021)¹. 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 1990², 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 1979³, the Protection of Wrecks Act 1973⁴, and the Historic Buildings and Ancient Monuments Act 1953⁵ also contain relevant statutory provisions.

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

Development within a Historic Environment

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

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf.

² <https://www.legislation.gov.uk/ukpga/1990/9/contents>.

³ <https://www.legislation.gov.uk/ukpga/1979/46/contents>.

⁴ <https://www.legislation.gov.uk/ukpga/1973/33/contents>.

⁵ <https://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents>.

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

The *designated heritage assets* (see below) potentially impacted by a development are, by definition, a known quantity and, to a greater or lesser extent, their significance is appreciated and understood. In general, undesignated heritage assets of comparable value to designated assets are also readily identifiable. Nonetheless, understanding of the value and significance of the designated heritage assets must be achieved via a staged process 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*⁶.

The relevant Historic England guidance is *Managing Significance in Decision-Taking in the Historic Environment*⁷. The following is a staged process for decision-taking, largely based on that document.

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

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

For designated heritage assets, which have been designated *because* they are deemed significant, Step 1 is relatively straightforward, and Step 2 is also, to a degree quantified, as the determination of significance, to a greater or lesser extent, took place then the heritage asset was designated⁸. 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 non-designated, the significance of the effect (Table 3) and an assessment based on professional judgement (Table 4) can be determined. The former is logical and objective, the latter is a more nuanced but subjective, and the accompanying discussion provides the more narrative but subjective approach advocated by Historic England. This is a useful balance between rigid logic and nebulous subjectivity (e.g. the significance of effect on a Grade II Listed building can never be greater than moderate/large; an impact of substantial adverse is almost never achieved). This is in adherence with GPA3⁹. The term used – professional judgement – is defined here as applying knowledge, skills, and experience in a way that is informed by professional standards, laws, and ethical

⁶ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>. Paragraph 007.

⁷ Historic England 2015: *Managing Significance in Decision-Taking in the Historic Environment Good Practice Advice in Planning Note 2*. Paragraph 6.

⁸ With the caveat that Listed building descriptions vary in quality between authorities, and interiors may not have been inspected.

⁹ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 19.

principles to provide a considered, fair, and impartial assessment as to the likely impact of a proposed development.

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 SSC LG38*. However, following a recent High Court action¹⁰ 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 5 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*¹¹. 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*¹², *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*¹³. 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 states¹⁴: *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 1 is based on the current DRMB, Table 3.3N; Table 2 refers back to the 2011 DRMB which more usefully defines value in relation to designation.

TABLE 1: 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.

¹⁰ UK Holocaust Memorial in Victoria Tower Gardens in Westminster, reference APP/XF990/V/193240661.

¹¹ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 9.

¹² 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.

¹³ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 16.

¹⁴ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>. Paragraph 013.

TABLE 2: 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 3: SIGNIFICANCE OF EFFECTS MATRIX (BASED ON DRMB LA 104 2020 TABLE 3.8.1; 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 (either adverse or beneficial)				
Environmental Value (Sensitivity)	WHS sites that convey OUV	Neutral	Slight	Moderate or Large	Large or Very Large	Very Large
	Very High	Neutral	Slight	Moderate or Large	Large or Very Large	Very Large
	High	Neutral	Slight	Slight or Moderate	Moderate or Large	Large or Very Large
	Medium	Neutral	Neutral or Slight	Slight	Moderate	Moderate or Large
	Low	Neutral	Neutral or Slight	Neutral or Slight	Slight	Slight or Moderate
	Negligible	Neutral	Neutral	Neutral or Slight	Neutral or Slight	Slight

TABLE 4: PROFESSIONAL JUDGEMENT OF IMPACT (BASED ON DMRB LA 104 2020 TABLE 3.4N).

Magnitude of Impact		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 5: SCALES OF IMPACT AS PER THE NPPF, AS RELATED TO TABLE 4.

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>Major 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*¹⁵. 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 assessment¹⁶, may conclude with intrusive investigations, and may reference some or all of the following:

1. Documentary research (published works, primary and secondary sources in record offices).
2. Existing archaeological reports or surveys for the site.
3. Historic maps.
4. Archaeological research (historic environment records (HER), event records (HER), Historic England National List; Portable Antiquity Scheme (PLS) records, grey literature reports (available from the Archaeological Data Service).
5. Historic Landscape Characterisation (HLC).
6. Aerial photography (National Mapping Programme, historic aerial photographs (Historic England, Cambridge, Britain from Above), recent commercial photography (Google Earth)).
7. LiDAR analysis (Environment Agency data, TELLUS data).
8. Oral testimony.
9. Walkover survey (or for historic buildings, a historic building appraisal¹⁷).
10. Geophysical survey, if suitable (magnetometry, electrical resistance, ground-penetrating radar)¹⁸.
11. Archaeological trench evaluation¹⁹, if appropriate.

¹⁵ Historic England 2015: Managing Significance in Decision-Taking in the Historic Environment: *Historic Environment Good Practice Advice in Planning Note 2*.

¹⁶ CIfA 2014 updated 2020: *Standard and guidance for historic environment desk-based assessment*.

¹⁷ Historic England 2016: *Understanding Historic Buildings: A Guide to Good Recording Practice*.

¹⁸ CIfA 2014 updated 2020: *Standard and guidance for archaeological geophysical survey*. Schmidt, A., Linford, P. Linford, N. David, A, Gaffney, C., Sarris, A. & Fassbinder, J. 2016: *EAC Guidelines for the Use of Geophysics in Archaeology*.

¹⁹ CIfA 2014 updated 2020: *Standard and guidance for archaeological field evaluation*.

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*²⁰. 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 steps²¹:

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, 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) or ZVI (zone of visual influence).

Pursuant to *Steps Two* and *Three*, a series of site visits are made to Category #1 designated heritage assets. 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

²⁰ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 9.

²¹ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 9.

completed for each assessed designated heritage asset, and, with an emphasis on practicality and proportionality,²² 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.

In this report, Category #1 heritage assets receive their own written assessment, as per the pro forma below:

Asset Name: The name of the heritage asset, usually as it appears in its Listing or Scheduling	
<i>Parish:</i> The ecclesiastical parish in which the asset lies	<i>Within the ZTV:</i> Whether assets stands within the ZTV of the development (if relevant)
<i>Designation:</i> Its official designation (e.g. Grade II)	<i>Value:</i> According to Tables 1 and 2
<i>Distance to the site:</i> Determined as the crow flies	<i>Condition:</i> A visual assessment of its condition
<i>Description:</i> Here the official descriptive text from Historic England (or relevant heritage body) is reproduced. In the case of non-designated heritage assets, the description is provided by the HER entry or field observations (e.g. 'A three-cell cross-passage house, eight-over-eight sashes to the front elevation, with a central six-panel door etc.').	
<i>Supplemental Comments:</i> Any additional information on the asset, noted during the site visit, especially if at variance with the official description (e.g. 'the house has a lateral stack to the rear, and the windows have been replaced since it was Listed').	
<i>Conservation Value:</i> A description of the heritage value of the asset, usually based on the four <i>Conservation Values</i> (evidential, historical, aesthetic, communal) presented in English Heritage 2008. It may include the related but separate <i>interests</i> outlined in the NPPF (archaeological, architectural and artistic, historic). (E.g. 'an attractively composed cottage with garden, with high evidential value as the interior was not inspected during the Listing process etc.')	
<i>Authenticity and Integrity:</i> These concepts come from ICOMOS, and relate to the physical condition of the asset, and the degree to which it survives as a genuine embodiment of the thing it purports to be (e.g. 'the house is in good condition, having been recently renovated, but its windows have been replaced').	
<i>Topographical Location & Landscape Context:</i> A quick description of the physical topography of the place (e.g. 'on a south-facing slope towards the base of the long ridge').	
<i>Setting:</i> A description of the setting of the asset. Usually, but not always, limited to its immediate setting, with some reference to its wider setting (e.g. 'the whole surrounded by open fields').	
<i>Principal Views:</i> Principal views covers both designed or intended views, and those fortuitous views that nonetheless better reveal the heritage value of the asset (e.g. 'down the lane to the main façade', or 'from the house along the avenue to the triumphal arch').	
<i>Landscape Presence:</i> This covers those landmark assets visible across wide areas (e.g. 'the tower of the church is visible from the neighbouring villages').	
<i>Sensitivity of Asset:</i> A discussion of the sensitivity of the asset to change within its immediate setting or broader landscape context if relevant, with reference to the identified conservation values (e.g. 'the principal value of this monument is evidential/archaeological, which is neither enhanced nor diminished by the proposed development' or 'the principal value of this structure is aesthetic/artistic, which would be greatly diminished by development within its gardens').	
<i>Contribution of Setting to Significance of Asset:</i> A brief assessment of how setting enhances the significance of a heritage asset, or better reveals the significance of a heritage asset (e.g. 'the house stands within its gardens/park with views down the valley to and from a folly tower on the hillside' or 'the gardens were laid out by the designer to compliment the western façade of the house').	
<i>Scale of Change:</i> A brief description of how the proposed development would affect the setting of the heritage asset, for better or for worse, usually including a discussion of the degree of screening the asset enjoys, as determined by the site visit (e.g. the proposed new dwelling would be located across the lane from the house, but screened by the existing farm buildings from the main façade').	
<i>Significance of Effect:</i> As per Table 3, derived from DRMB LA 104 2020; ICOMOS 2011, 9-10.	
<i>Professional Judgement:</i> As per Table 4, ultimately derived from DMRB LA 104 2020 Table 3.4N.	

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 6.

²² 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.

TABLE 6: 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

The Setting of Buried or Conceptual Assets

Some heritage assets have no remaining surface expression and survive *only* as buried archaeological features. Some Scheduled Monuments were designated on the basis of significant cropmarks or else were mapped by the Ordnance Survey in the 19th century and have been ploughed flat. Registered Battlefields may not even have an archaeological expression, and function as conceptual assets.

GPA3 states²³: *Heritage Assets that comprise only buried remains may not be readily appreciated by a casual observer. They nonetheless retain a presence in the landscape and, like other heritage assets, may have a setting.*

These points apply equally, in some rare, to designated heritage assets such as Scheduled Monuments or Protected Wreck Sites that are periodically, partly, or wholly submerged, e.g. in the intertidal zone on the foreshore. The location and setting of historic battles, otherwise with no visible traces, may include important strategic views, routes by which opposing forces approached each other and a topography and landscape features that played a part in the outcome.

In general, without strong historical associations (e.g. battlefields) it is difficult to assess the likely impact of a proposed development on a buried heritage asset. If meaning can be derived from an appreciation of landscape context – e.g. an elevated location for a lost hillfort or barrow – then a consideration of setting, and the ability of setting to better reveal the significance of a site, remains relevant. Where that is not possible, the significance of physical setting is much diminished.

Type of Impact

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

Construction Phase

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

Operational Phase

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

Decommissioning Phase

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

In general, the operational impacts are assessed in this document. Construction phase impacts may be considered, but while more intense are usually short-term in nature. The potential impact of the decommissioning phase, for most projects, is harder to predict and, outside of renewable developments with their fixed use-lives, should effectively be considered permanent.

²³ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 8.

Group Assessment

Individual assessments give some indication as to how a development may affect a particular cottage, historic park, or hillfort, but collective assessment is 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 states²⁴: *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 states²⁵: *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.

²⁴ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>. Paragraph 013.

²⁵ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 9.3.

Definitions

Heritage Assets

The NPPF Glossary defines heritage assets as: *A building, monument, site, place, area, or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)*²⁶. 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*²⁷.

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*²⁸. These are used to determine and express the relative importance of a given heritage asset. The definition of those terms is summarised below:

Evidential Value

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

Historical Value

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

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

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

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

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

Aesthetic Value

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

Design value relates primarily to the aesthetic qualities generated by the conscious design of a building, structure,

²⁶ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>.

²⁷ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>.

²⁸ English Heritage 2008: *Conservation Principles: policies and guidance for the sustainable management of the historic environment*.

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 PPG²⁹ 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.

²⁹ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>. Paragraph 006.

Concepts from World Heritage Guidance

World Heritage Sites are assessed with reference to their own, non-statutory, guidance³⁰. This includes the useful concepts of *authenticity* and *integrity*³¹:

Authenticity

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

Integrity

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

Designated Heritage Assets

The majority of the most important ('nationally important') heritage assets are protected through *designation*, with varying levels of statutory protection. These assets fall into one of six categories, although designations often overlap, so a Listed early medieval cross may also be Scheduled, lie within the curtilage of Listed church, inside a Conservation Area, and on the edge of a Registered Park and Garden that falls within a World Heritage Site. The NPPF Glossary defines a designated heritage asset as: *A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation*³².

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

³⁰ ICOMOS 2011: *Guidance on Heritage Impact Assessment for Cultural World Heritage Properties: a publication of the international Council on Monuments and Sites*.

³¹ UNESCO 2021: *Operational Guidelines for the Implementation of the World Heritage Convention*. Paragraphs 79-95.

³² <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>.

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

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

Conservation Areas

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

Scheduled Monuments

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

Registered Parks and Gardens

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

Registered Battlefields

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

World Heritage Sites

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

Setting

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

The NPPF Glossary defines the setting of a heritage asset as: *The surroundings in which a heritage asset is*

*experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral*³³.

The principal guidance on this topic is contained within one publication: *The Setting of Heritage Assets: Good Practice Advice* ³⁴. 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 GPA3³⁵:

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...*³⁶ *The Setting of Heritage Assets*³⁷ 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 PPG³⁸: *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 GPA3³⁹: *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.*

³³ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>.

³⁴ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.).

³⁵ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraphs 8, 9.

³⁶ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 10.

³⁷ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 11.

³⁸ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#assess-substantial-harm>. Paragraph 013.

³⁹ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 16.

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

In addition, visibility alone is no clear guide to visual impact. People perceive size, shape and distance using many cues, so context is critically important. For instance, research on electricity pylons⁴⁰ 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*⁴¹.

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 area⁴² 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.

⁴⁰ 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.

⁴¹ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 7.

⁴² Historic England 2017: *Understanding Place: Historic Area Assessments*.

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

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

Principal Views, Landmark Assets, and Visual Impact

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

On a landscape scale views, taken in the broadest sense, are possible from anywhere to anything, and each may be accorded an aesthetic value according to subjective taste (this is the *amenity value* of views⁴³). 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 (see Table 7~~ERROR! REFERENCE SOURCE NOT FOUND.~~), some of which are seasonal or weather-related.

⁴³ Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraphs 14-16.

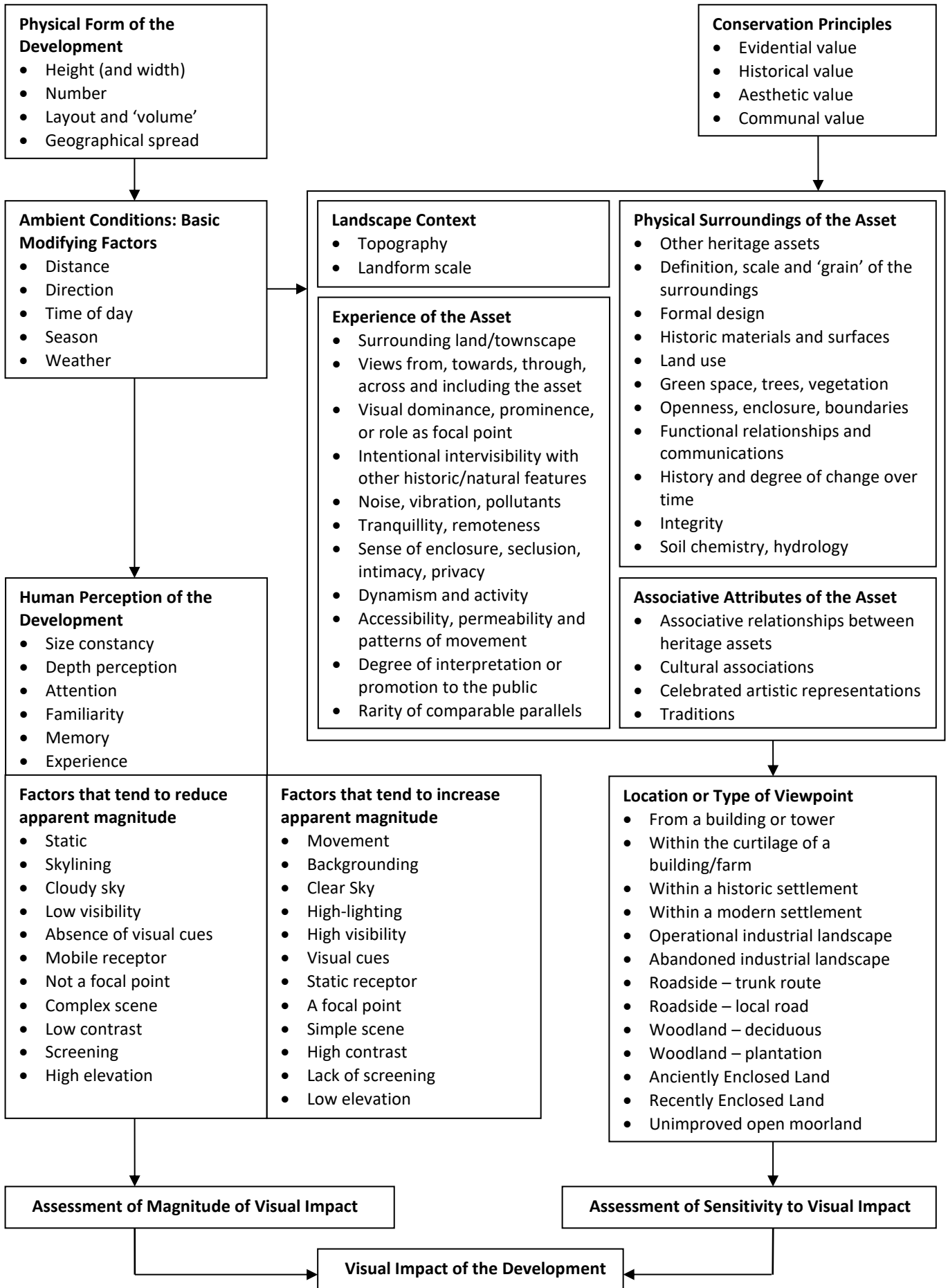


TABLE 7: THE CONCEPTUAL MODEL FOR VISUAL IMPACT ASSESSMENT PROPOSED BY THE UNIVERSITY OF NEWCASTLE (2002, 63), MODIFIED TO INCLUDE ELEMENTS OF ASSESSMENT STEP 2 FROM THE SETTING OF HERITAGE ASSETS (HISTORIC ENGLAND 2017, 11, 13).



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

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