

SITE OF THE ROBOROUGH HOUSE HOTEL

PILTON

BARNSTAPLE

DEVON

Results of a Heritage Impact Assessment



South West Archaeology Ltd. Report No. 231128



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Site of Roborough House Hotel, Pilton, Barnstaple, Devon

Results of a Heritage Impact Assessment

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SUMMARY

This report presents the results of a heritage impact assessment carried out by South West Archaeology Ltd. for the site of Roborough House Hotel, Pilton, Barnstaple, Devon as part of an application for planning permission.

The site lies to the north-east of Pilton in the historic manor of Raleigh which passed from the family of Raleigh to Chichester in 1362 then to the Champney, Hooper and Basset families. It was purchased in the late 18th century by Robert Newton Incledon Esq. of Pilton House. Several documents refer to Roborough in the earlier post medieval period although they do not specifically reference buildings. The tithe map omits Roborough, for an unknown reason. An 1845 map however shows several buildings at Roborough, indicating there was a substantial dwelling at this date. The 1841 census records one property occupied by three agricultural labourers. Since there is evidence for a relatively large house on the site just after this date it is possible therefore either the house was constructed between 1841 and 1845, the house was of relatively low status in 1841 and used only as housing for agricultural labourers or else the agricultural laborers lived in another dwelling and the occupant of the house was away at the date of the census so was not recorded at this address. By 1850 Roborough is occupied by a Farmer named Thomas Brown, whose family size and number of servants indicates either substantial expansion or rebuilding of the property may have occurred between 1841 and 1850 and suggests a context for the development of the landscaped gardens. The Brown family retained ownership of Roborough until the early 20th century with George Brown, a land agent and JP documented as head of the household for much of the later 19th century.

The Roborough Estate appears likely to have been sold some time before 1939, the farm and most of the cottages entering into separate ownerships. The house become a hotel after 1971 and suffered a substantial fire in the 1990s leading to its demolition. Sales particulars from 1983 show a large white painted and rendered building with slate roof, identical in form to the building shown on historic Ordnance Survey maps. The sales particulars state the house to be Georgian, presumably based on its appearance, however historic mapping suggests that much of the house is likely to post date 1845. It appears probable, based on photographs of the house taken in the 1990s following the fire that the north, west and south elevations represent surviving parts of the earlier C shaped building shown on the 1845 map, subsequently incorporated into a larger courtyard house. The house has extensive woodland gardens accompanying it which appear to be of one phase and contemporary with the extension of the house. As a house set within a designed landscape the house and garden derive their significance from each other.

The proposed development would see the construction of a residential care home on the footprint of Roborough House and extending into the first garden compartment. The archaeological potential of the site is considered high. The indirect impact of the current proposals is considered moderate adverse however recommendations and mitigation measures have been proposed which, if fully implemented, could allow the heritage impact of the development assessed as major beneficial.



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1.0 INTRODUCTION

LOCATION:	SITE OF ROBOROUGH HOUSE HOTEL
PARISH:	PILTON
DISTRICT:	NORTH DEVON
COUNTY:	DEVON
NGR:	SS 56791 34999
PLANNING NO.	PRE PLANNING
OASIS NUMBER:	SOUTHWES1-521055
SWARCH REF.	PRH23

1.1 PROJECT BACKGROUND

South West Archaeology Ltd. (SWARCH) was commissioned to undertake a heritage impact assessment for the site of Roborough House Hotel, Pilton, Barnstaple, Devon as part of a planning application for development of the site as a residential care home. The report comments on the proposals based on the floor plans provided by the client; no elevation drawings, designs or information on suggested build form or materials have been considered in this assessment. This work was undertaken in accordance with best practice and ClfA guidance.

1.2 TOPOGRAPHICAL AND GEOLOGICAL BACKGROUND

Pilton sits on a shallow ridge running back from the estuary of the River Taw, bounded on the south-east by the River Yeo and to the north-west by Bradiford water. The site lies at approximately 120m AOD. The soils of this area are well drained, fine loamy soils of the Denbigh 2 Association (SSEW 1983); these overlie the sedimentary mudstone of the Pilton Formation (BGS 2023).

1.3 HISTORICAL & ARCHAEOLOGICAL BACKGROUND

Pilton, in the hundred of Braunton and the Deanery of Barnstaple, has its roots as an early medieval settlement but has become a suburb on the northern edge of Barnstaple. Pilton was one of the four original burhs in Devon and its church, St. Mary's, lies on the edge of a former Priory enclosure, a cell to Malmesbury Abbey (Lysons 1822). Roborough likely formed part of the centre of the manor of Raleigh (Rawleigh), which passed from the Raleigh's to the Chichester's in 1362.

The site lies within an area identified as post medieval park/garden in the Devon Historic Landscape Characterisation (HLC). Roborough House appears to have been constructed or heavily modified in the mid 19th century, becoming a hotel in the later 20th century and was extant until a fire in the 1990s. It has well preserved landscaped gardens, documented on the Ordnance Survey first edition map which include two listed structures. In the vicinity of the house, the Devon HER records the findspot of a Bronze Age brass celt (MDV12483). Burr ridge Hillfort lies a few meters north-east of the former house and is thought to be the site of the former burh. Excavations were carried out to the south west of the site of Raleigh House in 2005 (Humphreys 2005) and revealed a walled garden associated with Raleigh manor.

The proposal site and surrounding area has been subject to significant change during the 19th and 20th century. The site falls into an area classified as *Post Medieval Park/Garden* in the Devon Scilly Historic Landscape Characterisation, with the landscaped gardens accompanying the house likely to have been created in the mid 19th century. Roborough House lies in a largely agricultural landscape on the outskirts of Barnstaple which has seen increasing encroachment into its rural setting in recent decades. There has been limited archaeological fieldwork in the area surrounding the site and a number of designated and undesignated heritage assets are documented in the landscape around the site. There are 70 Listed Buildings within 1km of the site including two within

Roborough House Gardens. There is one Scheduled Monument within 1km of the site, Burr ridge Hill Fort, to the north of Roborough House. The Barnstaple Town Centre Conservation Area lies c. 560m to the south west of the site. There are no World Heritage Sites or Registered Parks and Gardens within 1km of the site however the Roborough House Gardens have been considered as a non-designated heritage asset of equal value to a designated heritage asset (Grade II Registered Park and Garden).

1.4 METHODOLOGY

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



FIGURE 1: SITE LOCATION. CROWN COPYRIGHT 2023. ALL RIGHTS RESERVED. LICENCE NUMBER 100022432

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 Levelling Up, Housing and Communities 2023). 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

Policy ST15: *Conserving Heritage Assets in The North Devon and Torridge Plan 2011-2031* makes the following statement:

(1) The quality of northern Devon's historic environment will be preserved and enhanced through positive management by:

- (a) conserving and enhancing the historic dimension of the landscape;*
- (b) conserving and enhancing cultural, built, historic and archaeological features of national and local importance and their settings, including those that are not formally designated;*
- (c) identifying and protecting locally important buildings that contribute to the area's local character and identity; and*
- (d) increasing opportunities for access, education and appreciation of all aspects of northern Devon's historic environment, for all sections of the community.*

(2) Proposals to improve the energy efficiency of, or to generate renewable energy from historic buildings or surrounding heritage assets will be supported where:

- (a) there is no loss or degradation of historic fabric including traditional windows; and*
- (b) equivalent carbon savings cannot be achieved by alternative siting or design that would have a less severe impact on the integrity of heritage assets.*

2.4 STRUCTURE OF ASSESSMENT – DIRECT AND INDIRECT IMPACTS

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

2.5 DEVELOPMENT PROPOSALS

The proposed development comprises a residential care home partly occupying the footprint of the former Roborough House Hotel and partly extending to the east, occupying the first compartment of the garden which surrounds the site. It is assumed that the development will not extend further north than the existing house platform and would not require the removal of any garden paths, including to the north of the house.

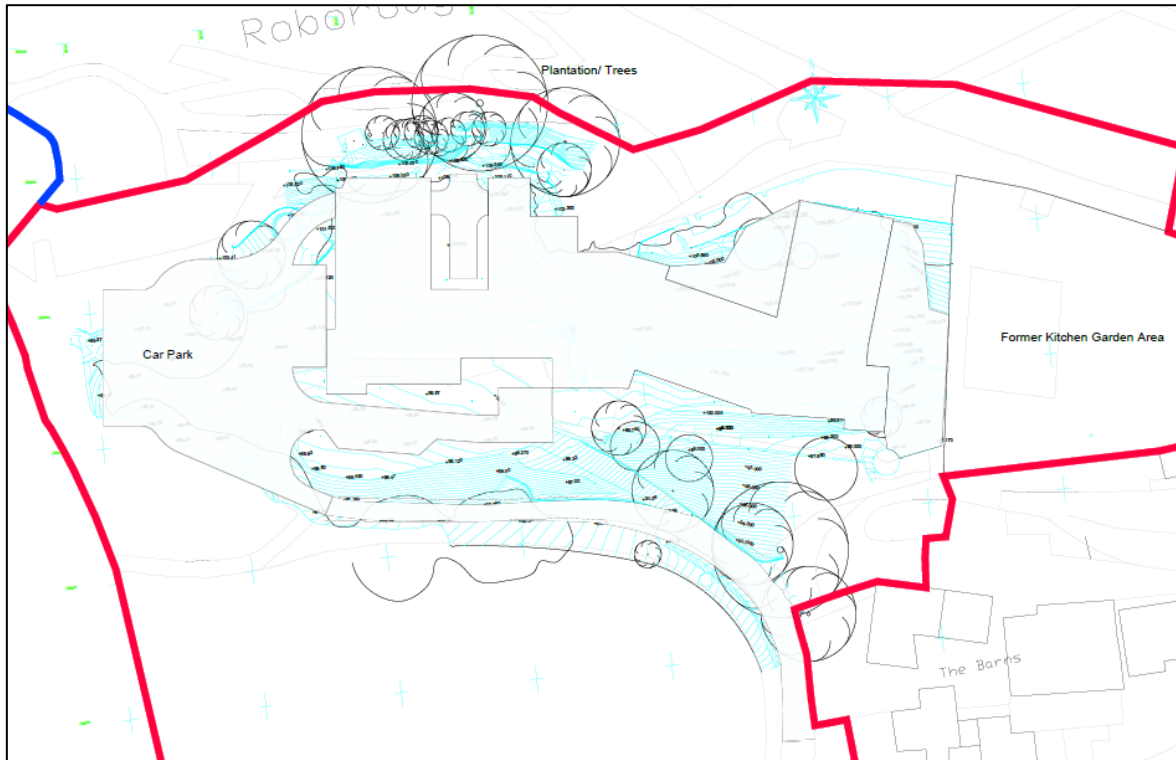


FIGURE 2: PROPOSED LAYOUT OF RESIDENTIAL CARE HOME OVERLAIN ON EXISTING GROUND PLAN (SUPPLIED BY CLIENT)

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

Roborough House formed part of the manor of Raleigh or Rawleigh, held by Geoffrey Bishop of Coutances in 1086; the Lord of the manor in 1066 was Brictric. The adjacent manor of Pilton had been established as an Anglo Saxon borough. The manor of Raleigh passed from the family of Raleigh to Chichester in 1362. It passed on to the later 17th century to the Champneys family and in the beginning of the 18th century to the Hooper family by whom it passed by marriage to the Bassets. It was purchased in the late 18th century by Robert Newton Incledon Esq. of Pilton House, who was twice mayor of Barnstaple. The old Raleigh Court was located on the site of the present Barnstaple Hospital, and was replaced in the 18th century by Raleigh House, built by Nicholas Hooper. Raleigh Court was stated to be a magnificent building and was noted amongst others by Camden.

There is little documentary evidence available concerning the evolution of the site of Roborough House. Even in Margaret Reed's seminal summary of Pilton (1985), she presents a very concise summary of the known information on the site:

Roborough House, built soon after the middle of the eighteenth century when Raleigh was emerging from its manorial cocoon, probably stands on the site of a far more ancient farmstead. This is a large two-storey slated building with considerable alteration and extension, set in extensive grounds. For two hundred years this has been a genteel residence with a panoramic view southwards, but of recent years it has been a private preparatory school and now a restaurant and hotel known as Roborough House Hotel. A path through the woods north of the house leads to the Iron Age fort on the ridge of the hill. There is a farmhouse in the grounds called Roborough Farm, which appears to be a nineteenth century building.

Several documents held at the North Devon Record Office refer to Roborough in the earlier post medieval period although they do not specifically reference buildings within the landholding. A 1665 lease between Sir John Chichester of Raleigh and John Seldon of Barnstaple, a merchant, refers to a 'tenement at Rowborough late Kerrey's' [1142 B/L54/3] suggesting a tenement was established at Roborough by the early post medieval period and possibly earlier. The following year a conveyance in the form of a lease and release for the sum of £690 between Sir John Chichester of Rawleigh and Philip Bouchier of Landkey references 'Davies Park, Little Rawleigh, Roborough and tenement late Bond's in Pilton and Shirwill' [1142 B/T43/6-7]. It is unclear whether John Seldon had given up his lease or whether Philip Bouchier acquired Roborough with John Seldon as a tenant. A further document of 1668 suggests a transfer of land ownership for '6 messuages, 5 gardens, 9 orchards, 60 acres land, 15 acres meadow, 54 acres pasture, at Little Raleigh, Roborough, and Kitehill' from Philip Bowchier to Arthur Ackland, merchant [1142 B/T43/8]. Further documentary research e.g. through hearth tax returns may be able to add further detail.

A 1743 view of Barnstaple (Figure 2) clearly shows the 18th century Raleigh House (the large white building with lots of windows), but no large buildings are shown on the lower slopes of the wooded ridge behind suggesting that there was not a large house on the site at this date, although the purposes of this painting are unclear and any buildings that did exist at Roborough could have been omitted for a number of reasons.

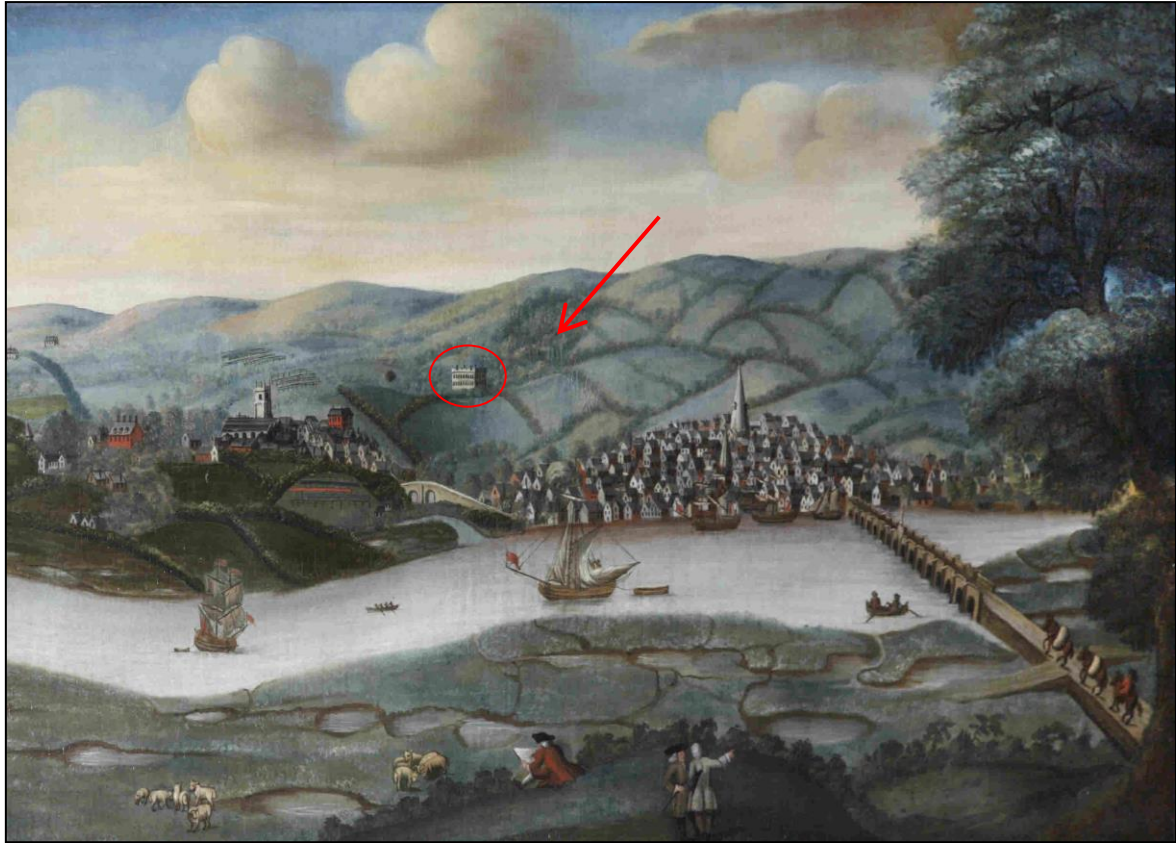


FIGURE 3: 1743 VIEW OF BARNSTAPLE (NORTH DEVON ATHENAEUM). APPROXIMATE LOCATION OF THE SITE IS ARROWED, WITH RALEIGH HOUSE RINGED.

An 1832 document [1142 B/T43/20-21] records the transfer of 'tithes of tenements called Great Roborough, Little Roborough, Smokey House, 4 fields part Raleigh, 2 gardens, Cleave Close, North Ground Meadow, Widlakes field' between John Smith and George Acland Barbor for the sum of £540. This clearly names two tenements at Roborough in reference to tithes however as the tithe map and apportionment for Pilton appears to omit Roborough, for an unknown reason given it appears to be tithable, these names cannot be compared with the tithe apportionment. An 1845 map of the parish of Pilton does however show several buildings at Roborough, although it misnames Raleigh House as Roborough, and shows there was clearly a substantial dwelling established on the site at this date. Whether it was a large farmhouse or small country house is unknown.

There is census data available for the site from the mid 19th century; the 1841 census shows one property named Roborough and states that it was the residence of three agricultural labourers, possibly unrelated, Edward Lancy, 35, John Geese, 40, and John Oliver, 16. There is map evidence for a relatively large house on the site just after this date; it is possible therefore that either the house was constructed between 1841 and 1845, the house was of relatively low status in 1841 and was used only as housing for agricultural labourers or else the agricultural laborers lived on another dwelling at the site and any owner or occupant of the house was away at the date of the census so would not have been recorded at this address. Whites Directory (1850) does not mention a Roborough House but, like the 1841 census does record Roborough, occupied by a Farmer named Thomas Brown. The 1851 census shows Thomas Brown, a land agent and farmer of 130 acres

residing at Roborough Farm with his wife and children. They reside with three house servants and four farm servants suggesting either substantial expansion or rebuilding of the property may have occurred between 1841 and 1850. It is evident the Brown family were not occupants of the site in 1841, as Thomas Brown is clearly recorded in the Bittadon census return for 1841 as a farmer.

By the 1861 census Roborough House is documented with George Brown 36, land agent as head of the household. No farm or cottages are recorded at Roborough on this census but the change in name from Roborough Farm to Roborough House could suggest a change in status of the property. The 1871 census records Roborough House, occupied by George Brown, 46, surveyor and his family as well as Roborough Farm, occupied by John Harris, a farmer of 165 acres. Roborough Cottage is also documented, occupied by John Cooke, an agricultural labourer. The Brown family are documented as having five female servants living in at the date of the 1871 census. Whites' directory of 1878 names George Brown as a JP, with an office in The Square, Barnstaple. George Brown and family continue to be documented in the 1881 and 1891 census for Pilton as the residents of Roborough House. In 1881 and 1891 Roborough Farm is recorded in the census, along with three Roborough Cottages, providing accommodation for two gardeners and a groom. Two of the cottages have less than 5 inhabitable rooms suggesting they were small two up two down type dwellings.

George Brown is documented as having married Isabel De Courcy Palmer in Barnstaple in 1860. Isabel was either the daughter of Nicholas Palmer (thepeerage.com) or Septimus Palmer (Colby 1892). Both were sons of the Very Reverend John Palmer, descended from the Palmer family of Great Torrington, who became Dean of Cashel and Precentor of Waterford before returning to Great Torrington. His father was the Reverend John Palmer of Great Torrington who had married Mary Reynolds, a noted British author and wrote *Devonshire Dialogue*, described by the Oxford Dictionary of Biography as "best piece of literature in the vernacular of Devon". She was also the sister of Sir Joshua Reynolds and mother of painter Theophila Gwatkin. After her marriage to John Palmer, a lawyer and mayor of Great Torrington they resided in a house they built, known as Palmer House and are recorded to have accommodated Dr Samuel Johnson when visiting Devon with Sir Joshua Reynolds. Given the family status of Isabel De Courcy Palmer, it is likely that as well as bringing some financial benefit to her marriage, she may have also had a social status which provides a greater context for the development of the gardens at Roborough.

By the 1901 census George Brown had died and the head of family was recorded as his wife, Isabel Brown. She is documented as residing with her unmarried children, the eldest son described as a solicitor. Three Cottages and a farm were still recorded at Roborough, with Elon Harris, previously documented as a gardener, becoming the coachman and William Smale and William Spear recorded as gardeners. Roborough Farm was occupied by James Passman and family. Some significant changes appear to have taken place by the 1911 census with Roborough House documented as occupied by John Holmes, a Sheep farmer in New Zealand, who had been born in Hampstead, residing with his family; his wife had been born in Newton Abbot and his daughter in New Zealand. The house is recorded as having 16 rooms. George Brown, solicitor, is also documented as residing at 'Roborough' along with his family and three indoor servants, possibly in the farmhouse, as his residence is documented as having 10 rooms. Elon Harris is still resident in one of the cottages but documented as a farm bailiff by this date rather than a coachman. William Spear is still recorded as a gardener resident at Roborough however William Smale appears to be residing at Trayne Cottage, suggesting only two cottages at Roborough by this date. The Record of Service of Solicitors and Articled Clerks with His Majesty's Forces 1914-1919 records a George William Frederick Brown, who practised in Barnstaple, admitted in February 1890 and serving as a Major in the 6th Battalion of the Devonshire Regiment during the First World War.

The 1939 England and Wales Register suggests further changes took place during the early 20th century as by this date Frederick Sanders, 41, an auctioneer and valuer is recorded as head of the household at Roborough House. Roborough Cottage was occupied by a gardener, William Gorvin

and Roborough Farm by George Worth. The second cottage is named as Roborough Farm Cottage and occupied by Edith Quick.

A further mention of Roborough House occurs in the 1971 London Gazette, as part of the estate of the deceased widow Edith Margaret Cooper Chappell (d.22/04/1971). Her solicitors, Pitts Tuckers of Barnstaple, were advertising for claimants to the estate. Subsequent to this the site seems to have become a hotel. Sales particulars for Roborough House Hotel from 1983 show it as a large square building with a projecting wing to the east and it appears identical in form to the building shown on the First and Second Edition Ordnance Survey maps. A curving driveway (still extant) leads to the southern elevation with the principal elevation appearing to be the western side, with bay windows and a projecting porch canopy. The building is rendered and painted white with a slate roof. The projection on the south elevation, shown as glass roofed on the historic maps appears to have a solid roof by this date and may have been rebuilt in its entirety on the footprint of an earlier conservatory. The projecting eastern element of the building appears to have a gabled end facing onto the access drive. The sales particulars show that 1 Roborough Cottage was sold into separate ownership at this date, the adjoining cottage appearing to have been in separate ownership. Interestingly the auctioneers listed on the front include the name 'Sanders', possibly linked to the occupant of the house documented in the 1939 Register, a Frederick Sanders, who had been recorded as an auctioneer. The sales particulars state the house to be Georgian, presumably based on its appearance, however the historic mapping suggests that much of the house is likely to post date 1845. It appears probable, based on photographs of the house taken in the 1990s following a fire [NDRO B513-1/126/1-5] however that the north, west and south elevations represent surviving parts of the earlier C shaped building shown on an 1845 map (see below), subsequently incorporated into a larger courtyard house. The sales particulars describe in detail the rooms within the building with dimensions and the hotel appears to have had three bedrooms in addition to restaurant, lounge, dining room, kitchens and other rooms on the ground floor with eight bedrooms and owners' accommodation on the first floor. A former stable block was attached to the rear of the hotel in addition to a number of outbuildings. The sales particulars also detail an Ice House in the landscaped gardens, although it is unclear if this might be a reference to a different garden feature as no Ice House is recorded in any other reference to the site.

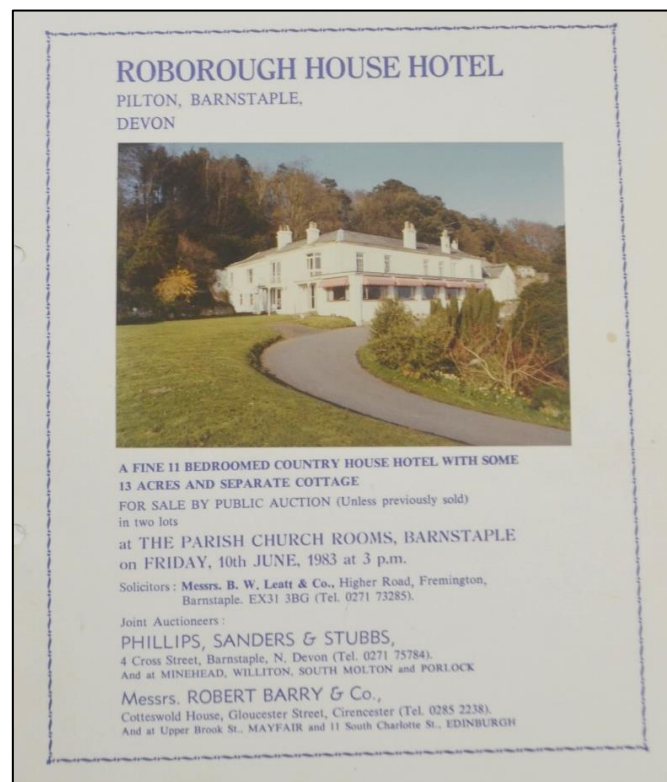


FIGURE 4: FRONT COVER OF THE SALES PARTICULARS FOR THE SALE OF ROBOROUGH HOUSE IN 1983 (NDRO B513/0/58)

Photos held in the North Devon Record Office [B513-1/126/1-5] show the House following a devastating fire in the 1990s. These suggest that part of the western and southern elevations were constructed of stone, whilst the remainder of the property was built in brick. This would accord with the property having been extended from the structure shown on an 1845 map of Pilton parish, rather than an entire rebuild taking place. Figure 5 shows an arched entrance under the roofline of the house, most likely to provide access to the service buildings at this end of the house or to stables/coach house.



FIGURE 5: PHOTOGRAPH TAKEN AFTER THE FIRE IN THE 1990s (NDRO B513-1/126/1-5)



FIGURE 6: VIEW FROM THE SOUTH WEST OF THE HOTEL FOLLOWING THE FIRE IN THE 1990s (NDRO B513-1/126/1-5)

3.3 CARTOGRAPHIC DEVELOPMENT

The 1765 Donne Map of Devonshire (Figure 7) shows the location of the site although no house or buildings are indicated on the map, suggesting it wasn't the site of a notable or large house at this date, as is also indicated by the 1743 view of Barnstaple (Figure 3). The adjacent Raleigh is labelled, with a house shown and Courtenay Esq marked on the map. Settlements at East and West Pit, to the south of Roborough are marked. This would indicate that Roborough was also not a notable settlement or farmstead at this date of this map, although the documentary evidence suggests it had clearly been established as a tenement in its own right by the later 17th century. The 1804 surveyors draft map for Barnstaple (Figure 8) indicates several buildings at Roborough, some to the north and south sides of a driveway from the road and a possible group of buildings closer to the end of the driveway on its northern side. The hillfort above the site is also shown on this map.



FIGURE 7: EXTRACT FROM THE 1765 DONNE MAP. THE APPROXIMATE SITE IS INDICATED

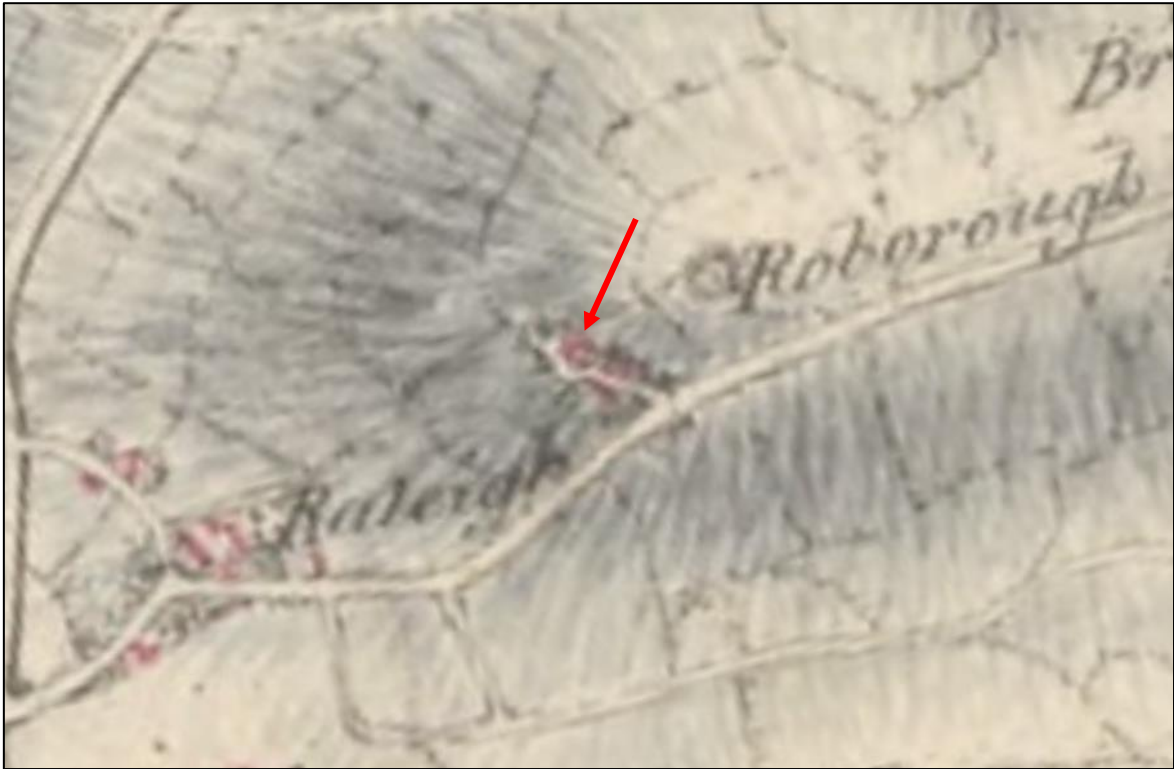


FIGURE 8: EXTRACT FROM THE 1804 SURVEYORS DRAFT MAP FOR BARNSTAPLE (THE APPROXIMATE SITE IS INDICATED)

A map by Dawson from 1832 and another published in Lewis's 1835 topographical dictionary of England (not illustrated) both show a similar depiction to the 1804 surveyors draft map with buildings shown to the north and south side of the driveway and at least two individual buildings or possibly groups of buildings shown near the terminus of the driveway on its northern side. It is possible one of the buildings may have been located slightly to the south west of Roborough House, where some slight earthworks are visible on the ground (see below). There appears to be no tithe map or apportionment for the site although the reason for this is unknown, it seems to have been tithable land but omitted from the Pilton tithe map. An 1845 map of Pilton described as 'copied from the parish map' does show Roborough although it erroneously gives Raleigh House this name whilst Roborough itself isn't labelled [NDRO B138/5]. The main house is shaded pink denoting it as a dwelling although Roborough Cottage, to the south west is shaded grey, suggesting it was either an agricultural building at this date or that the shading may either not have been entirely accurate or represented only substantial or principal dwellings. The house is shown as a C shape with small wings projecting to the east on both the north and south sides. The principal elevation appears to face west. A smaller building is shown just to the south west of the house and two further buildings are shown, possibly with an agricultural function to the north and south sides of the entrance drive to the house. The fields to the east of Roborough clearly represent former Medieval strip fields whilst the land surrounding the property is more irregularly enclosed fields. It is unclear whether the house had any landscaped gardens surrounding it at this date, although the field boundaries would indicate that if it did they must have been slightly more constrained than those shown on later mapping. The house appears to sit within an enclosed plot, possibly forming its immediate garden.



FIGURE 9: MAP SHOWING ROBOROUGH IN 1845 (NDRO B138/5)

The First Edition Ordnance Survey map surveyed c.1887 shows Roborough in detail during its occupation by the Brown family. It shows the extent of the wooded landscape and gardens around the site with a zigzag path leading up toward the hillfort above the house and numerous garden paths and walks. There is clearly a substantial element of design within the gardens which feature a possible quarried area incorporated into the north western area, accessed along a path and with a building located adjacent to it, possibly a viewpoint outwards. The main house is visible as a large roughly square building with an open courtyard area towards the rear. An irregular shaped wing is attached to the south eastern corner projecting towards a set of steps and several glasshouses are also shown on the eastern side of the main house. A large glass roofed structure is also shown against the southern elevation, fronting onto the main entrance/approach to the house which is via a curving driveway which turns 180 degrees in front of the house before winding around past the western side of the Roborough Farm buildings then due west past Roborough Cottage and turns 90 degrees towards Raleigh House and then joins the road towards Barnstaple.

To the south of the southern elevation, an oval shaped lawn or garden is shown with a pond, accessed by a set of steps. To the west of this lies another terraced area, also accessed by steps, with a small structure set within it. A number of other buildings are depicted at Roborough including the farm buildings to the south east of the main house which comprise a number of different building ranges with the farmhouse being the most southerly, set within its own garden. A curved building represents a probable horse engine within a range of barns. A separate set of buildings lies to the east of the house, north east of the main farm complex. It is possible that some of the buildings may represent the cottages indicated in the census information. Roborough Cottage is shown to the south west of the main house, along the primary entrance drive and appears to have either two chimneys or projecting porches, suggesting it may have originally been two cottages but is indicated as one dwelling on this map. Little change is visible on the Second

Edition Ordnance Survey map (Figure 8) although a fountain is shown in the garden to the south of the house.

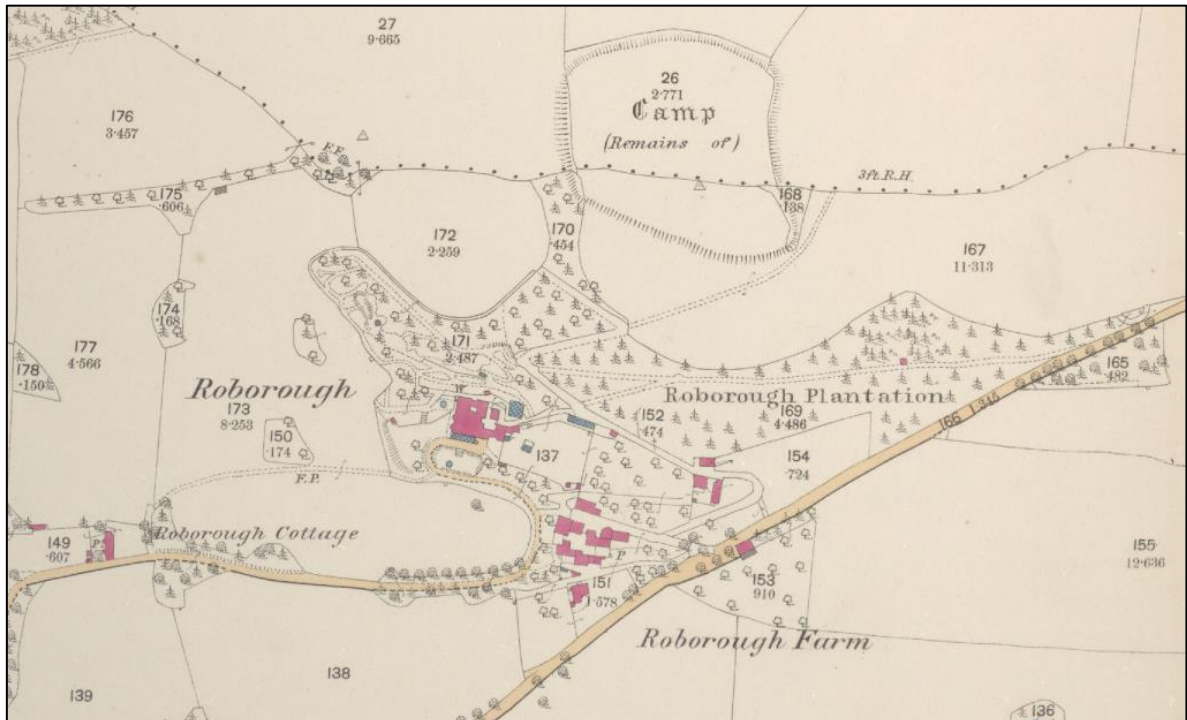


FIGURE 10: EXTRACT FROM FIRST EDITION ORDNANCE SURVEY 25 INCH MAP c.1887; THE APPROXIMATE SITE IS INDICATED (NLS)

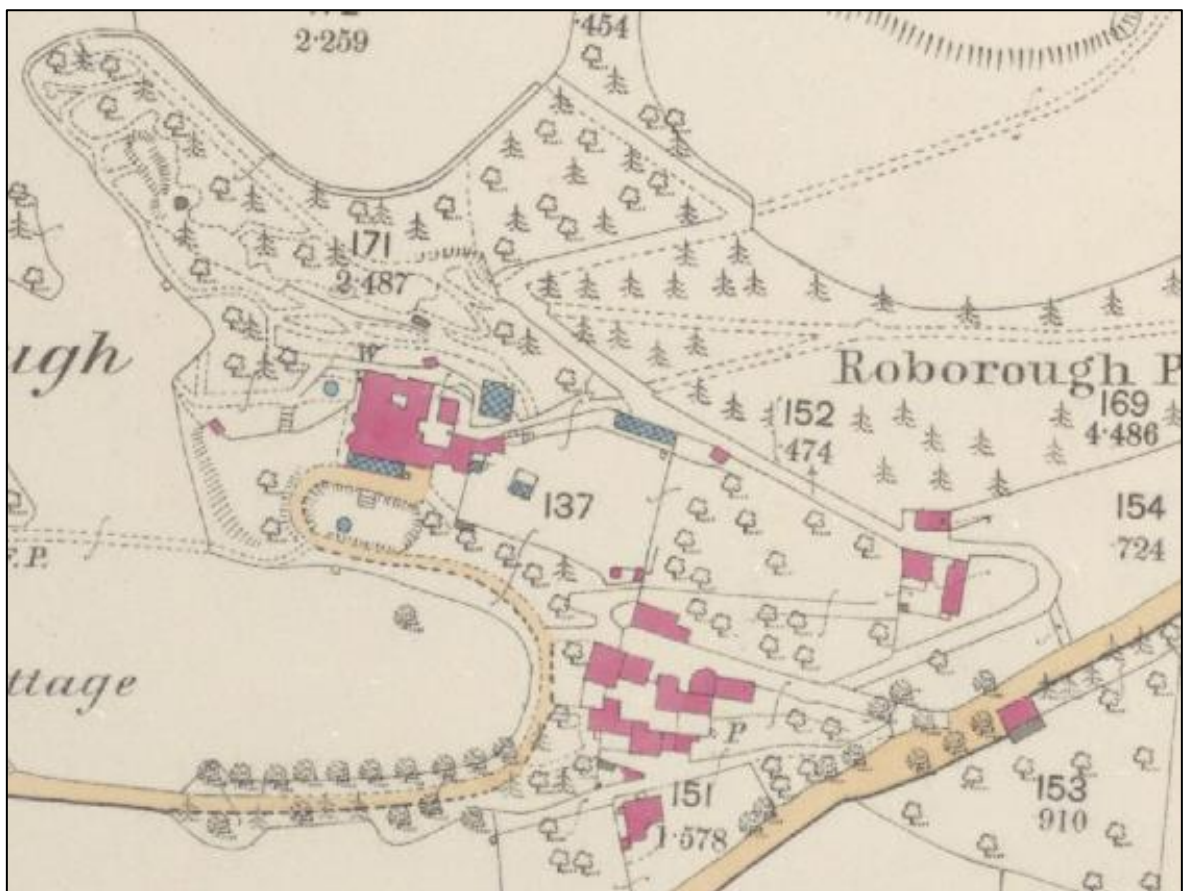


FIGURE 11: DETAILED EXTRACT FROM FIRST EDITION ORDNANCE SURVEY 25 INCH MAP c.1887; THE APPROXIMATE SITE IS INDICATED (NLS).

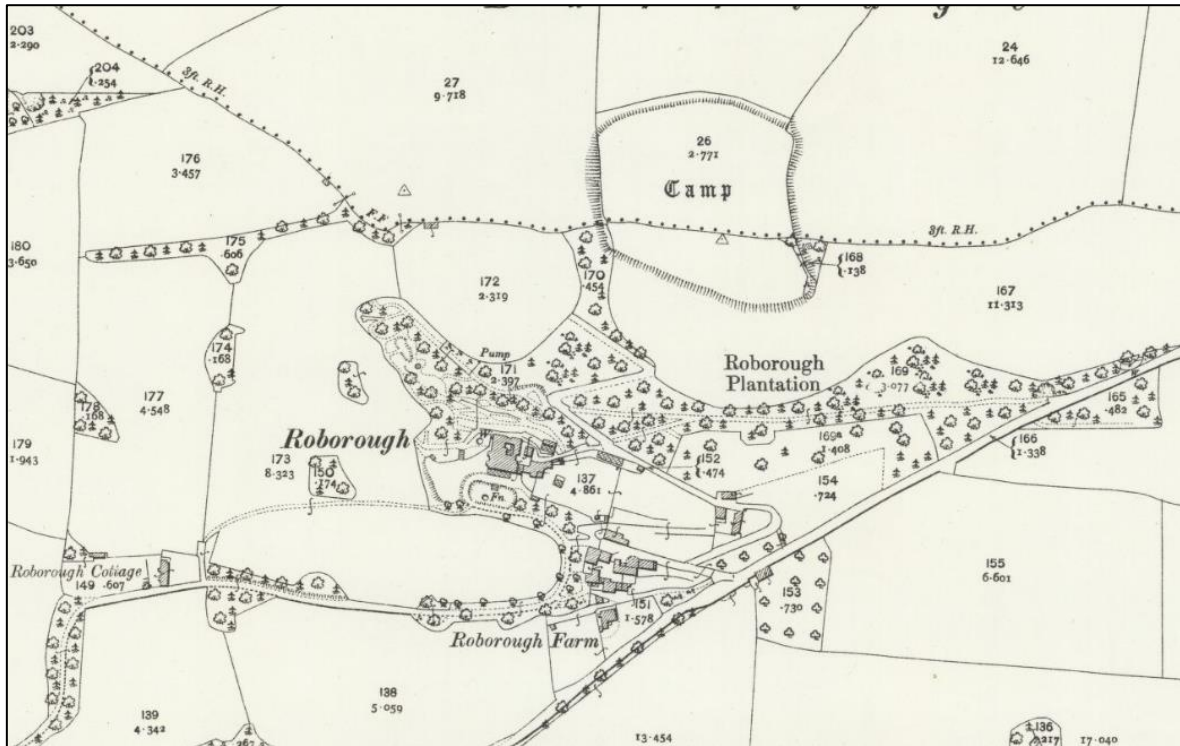


FIGURE 12: EXTRACT FROM THE SECOND EDITION 25 INCH ORDNANCE SURVEY MAP, 1903 (NLS). THE APPROXIMATE SITE IS INDICATED.

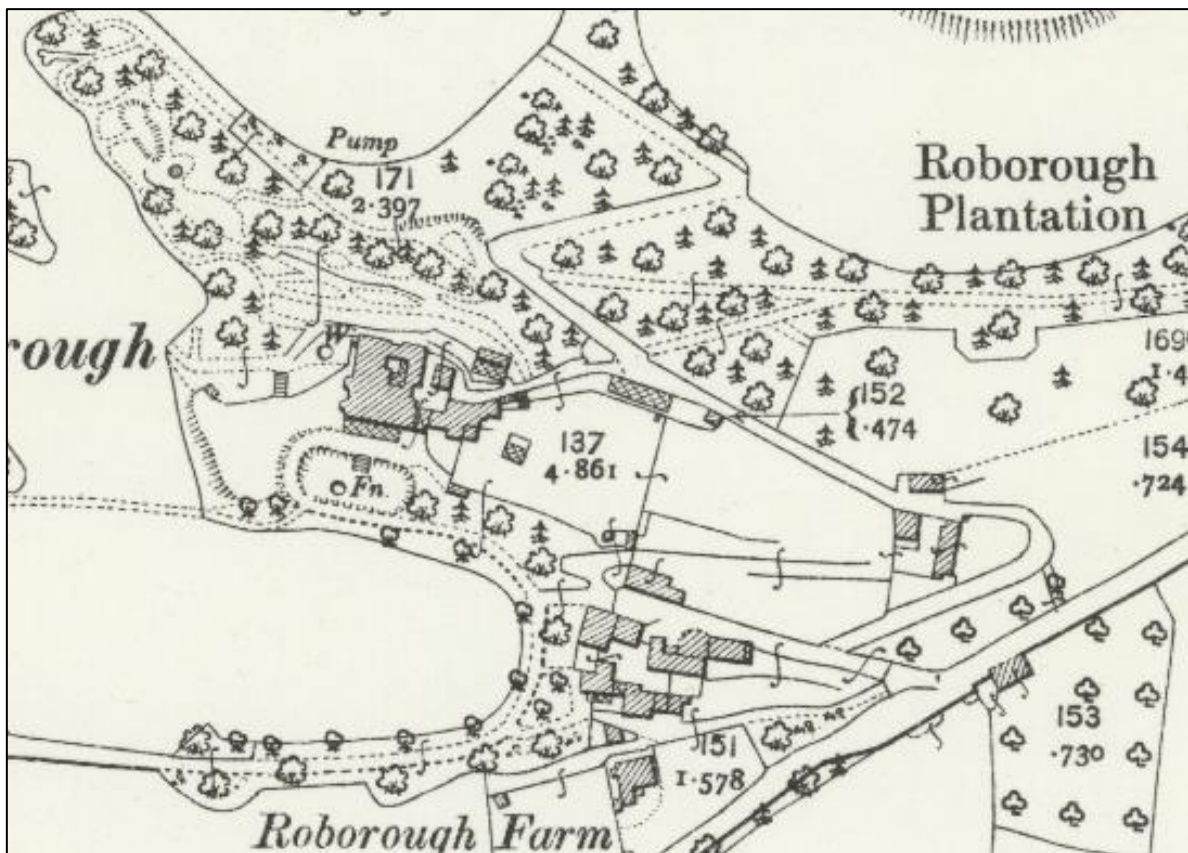


FIGURE 13: DETAILED EXTRACT FROM THE SECOND EDITION 25 INCH ORDNANCE SURVEY MAP, 1903 (NLS). THE APPROXIMATE SITE IS INDICATED.

An undated plan of the Roborough Estate prepared for its sale at some point in the early 20th century provides the usage of all of the buildings within the estate complex and shows a clear emphasis on fruit growing. It also shows the management of water across the estate.

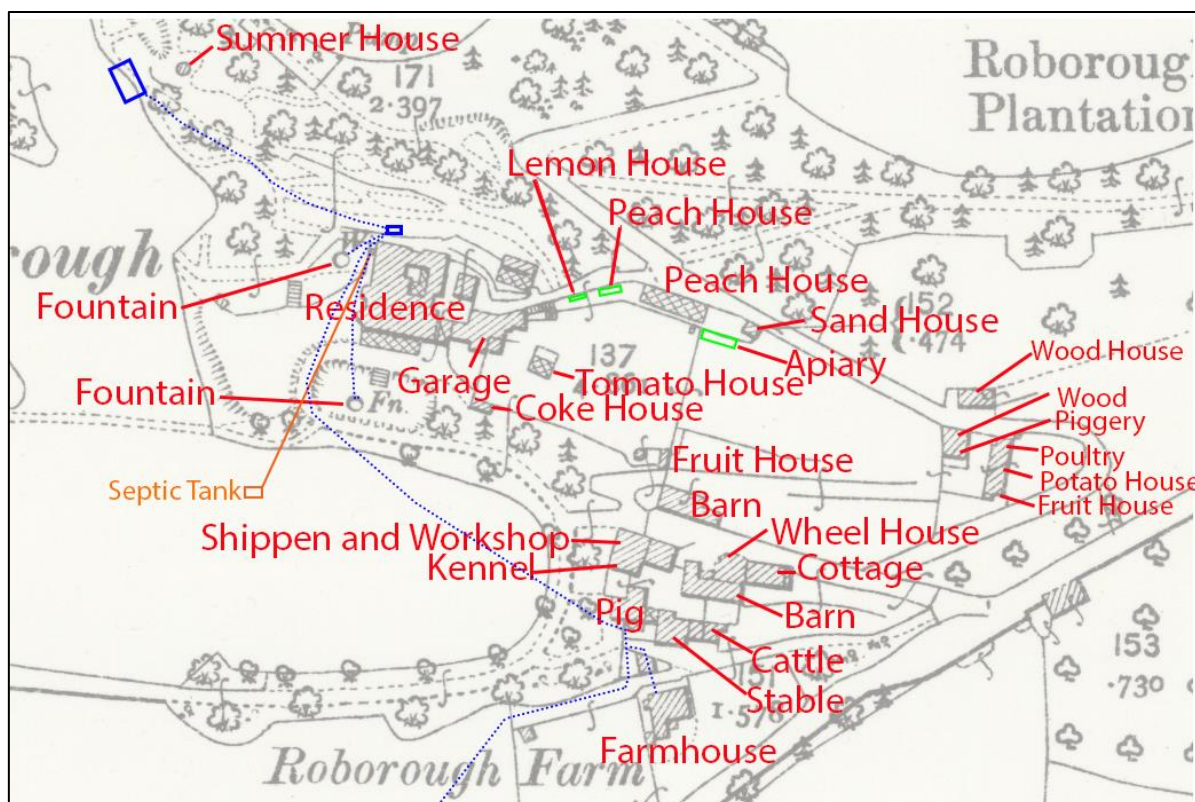


FIGURE 14: PLAN OF ESTATE WITH BUILDINGS LABELLED, AFTER EARLY 20TH CENTURY ESTATE PLAN (NDRO B170/1/182)

3.1 ARCHAEOLOGICAL BACKGROUND

The proposal site and surrounding area has been subject to significant change during the 19th and 20th century. The site falls into an area classified as *Post Medieval Park/Garden* in the Devon Scilly Historic Landscape Characterisation, with the landscaped gardens accompanying the house likely to have been created in the mid 19th century. Roborough House lies in a largely agricultural landscape on the outskirts of Barnstaple which has seen increasing encroachment into its rural setting in recent decades. There has been limited archaeological fieldwork in the area surrounding the site and a number of designated and undesignated heritage assets are documented in the landscape around the site. There are 70 Listed Buildings within 1km of the site including two within Roborough House Gardens. There is one Scheduled Monument within 1km of the site, Burr ridge Hill Fort, to the north of Roborough House. The Barnstaple Town Centre Conservation Area lies c. 560m to the south west of the site. There are no World Heritage Sites or Registered Parks and Gardens within 1km of the site however due to the high level of survival, the inclusion of build elements of the gardens and the inclusion of Listed buildings within them, the Roborough House Gardens have been considered as a non-designated heritage asset of equal value to a designated heritage asset (Grade II Registered Park and Garden).

3.1.1 PREHISTORIC 4000BC - AD43

There is relatively substantial evidence for Prehistoric activity in this area. To the north east of the site lies Burr ridge Hill Fort, a scheduled monument, with a separate outwork lying to the east, also included in its scheduling (MDV921). A brass celt (MDV12483) was found in close proximity to the hillfort in the 1950s and a standing stone of Prehistoric date is documented within the gardens of Roborough House (MDV1574). To the east of Roborough a linear and circular cropmark have been recorded, adjacent to the outwork of Burr ridge hillfort (MDV131775; MDV131785).

3.1.2 ROMANO-BRITISH AD43 – AD409

There is no documented evidence for Romano-British activity in the vicinity of the site or the surrounding landscape although there is the potential that Burr ridge hillfort continued in use during this period.

3.1.3 MEDIEVAL AD410 – AD1540

To the south-west of the site lies the site of the former manor of Raleigh, noted in Domesday and later home of the Chichester family. Roborough likely formed part of the Raleigh Estate. A possible walled garden which formed part of Raleigh manor is documented to the north of the present North Devon Hospital (MDV72958). An artefact scatter to the north of Burr ridge hillfort contained Medieval finds (MDV38930). A subcircular enclosure to the west of the site at Tutshill is visible on historic mapping and may be of medieval date (MDV80892). A stone built tower is also recorded at the site (MDV113107).

3.1.4 POST-MEDIEVAL AD1540 -1899

A majority of heritage assets recorded in the vicinity of the site are of Post Medieval date. Many of these relate to a number of mills and associated infrastructure in the wider area of the site. Roborough House was of Post Medieval date (MDV123095) and a folly (MDV32451) and summerhouse (MDV32452) within the landscape gardens are both Grade II Listed. A stone built tower is also recorded at the site (MDV113107). Raleigh House, to the south west was built in the Post Medieval period to replace the historic manor house and lies slightly to the north of the original house (MDV105061).

3.1.5 MODERN 1900-PRESENT AND UNKNOWN

A number of undated sites lie in the area around the site, predominantly comprising wells or quarries.

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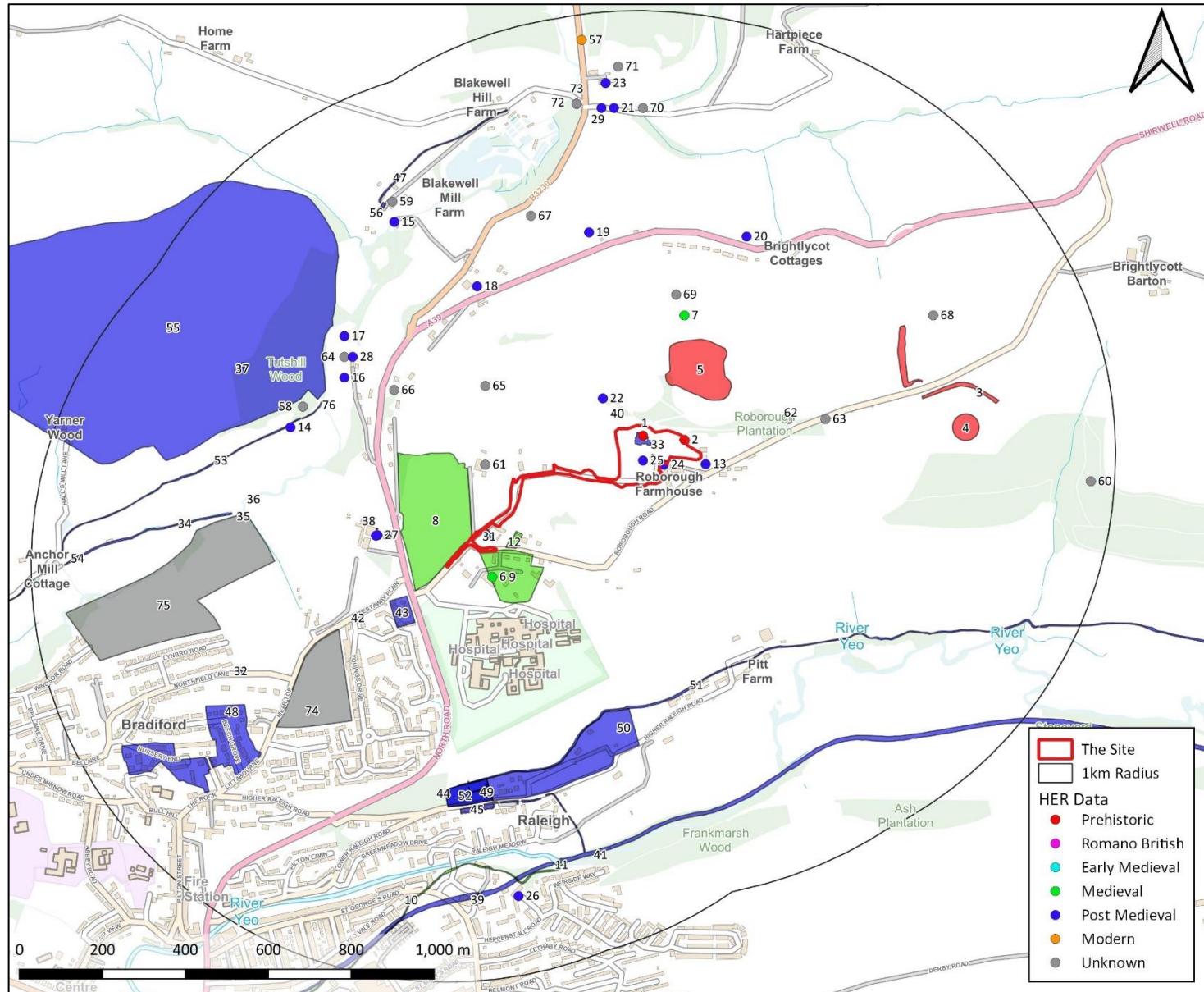


FIGURE 15: HERITAGE ASSETS WITHIN 1KM OF THE PROPOSAL AREA RECORDED IN THE DEVON HER CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2023.

SITE OF ROBOROUGH HOUSE HOTEL, PILTON, BARNSTAPLE, DEVON: HIA

TABLE 1: TABLE OF NEARBY HERITAGE ASSETS (SOURCE: DEVON HER).

No	Mon No	Name	Summary
1	MDV12483	FINDSPOT in the Parish of Pilton West	A brass celt found near roborough camp (wall) (roborough house, ngr ss56803501, stands just below burridge camp). Vis=13/10/1953 (os). No further information. Vis=flat axe. Length 130mm, blade width 73mm (pearce).
2	MDV1574	STANDING STONE in the Parish of Pilton West	Roborough house. A standing stone stands on the slopes below burridge camp in the gardens of roborough house.
3	MDV131775	Linear cropmark north of Smoky House Lane, Pilton	Linear cropmark north of Smoky House Lane, Pilton. The linear feature is located north of a circular cropmark within the same field.
4	MDV131785	Circular cropmark, north of Smoky House Lane, Pilton	Circular cropmark, north of Smoky House Lane, Pilton. It is located south of a linear arc cropmark within the same field.
5	MDV921	Burridge Hill Fort	Burridge Hill Fort also known as Burridge Camp and Roborough Castle an Iron Age hillfort with an outwork to the east which may have been the site of the Saxon burh of Pilton
6	MDV16308	Raleigh Manor, Barnstaple	Raleigh was a Domesday estate owned by Hugh de Raleigh in 1166 and Sir John Chichester in 1377.
7	MDV38930	ARTEFACT SCATTER in the Parish of Shirwell	At roborough hill fort medieval and post medieval finds were discovered from field walking and recorded by nddc rau in 1985 (nddc rau).
8	MDV105165	Archaeological anomalies identified by geophysical survey, land at Trayne Farm, Pilton West	Archaeological anomalies identified by geophysical survey, land at Trayne Farm, Pilton West.
9	MDV12523	Raleigh Mansion, Barnstaple	Site of a medieval mansion at Raleigh recorded on 1880s-1890s 25inch Ordnance Survey map. Excavations in 2005 revealed a site which may have been a walled garden associated with the mansion.
10	MDV20766	Leat to Barnstaple Town Mill	Leat to the former Town Mill, taken off the River Yeo at a weir at Raleigh. The mill race or leat is first referred to in a document of 1248. It is likely, therefore, that it was also in existence in 1107 when 'the mill of Barnstaple' is recorded in th
11	MDV57991	Weir on River Yeo, Raleigh, Barnstaple	Weir on River Yeo at head of leat to the former site of Town Mills.
12	MDV72958	Walled Garden at Raleigh, Barnstaple	Possible site of a walled garden which may have been associated with the medieval mansion at Raleigh
13	MDV113107	Tower Near Roborough House Hotel	Stone tower near Roborough House.
14	MDV32335	LEAT in the Parish of Pilton West	
15	MDV32424	Weir	
16	MDV32432	BRIDGE in the Parish of Pilton West	
17	MDV32434	BRIDGE in the Parish of Pilton West	
18	MDV32438	NURSERY GARDEN in the Parish of Pilton West	
19	MDV32439	NURSERY GARDEN in the Parish of Shirwell	
20	MDV32441	MILESTONE in the Parish of Shirwell	
21	MDV32444	BRIDGE in the Parish of Shirwell	
22	MDV32451	Folly at Roborough, Pilton	Late 19th century folly in the form of a ruined Gothic castle.
23	MDV32453	HOUSE in the Parish of Shirwell	Blatchford mill house, early 19th century. Stuccoed stone rubble and some cob. Slate roof with gable ends rebuilt brick gable end stacks. Single pile with two storey outshut to rear. Three storeys, three bays. Timber sashes with glazing bars. Central doo
24	MDV37700	TOWER in the Parish of Pilton West	Vis=13/6/1989 (goodwin). Round tower at roborough house. Castellated round tower built on sloping site. Stone rubble, slate roof. Rectangular door on west side. Rendered internally. Now ivy covered. Internal diameter 3m, height of walls 3m to 2m (goodwin
25	MDV37701	TOWER in the Parish of Pilton West	Vis=13/6/1989 (goodwin). Rectangular tower built of rubble stone with sloping tiled roof sloping nn/e. Measurements: 2.8m x 2.5m (internal measurement). Height: 3m to 4m approx (goodwin).
26	MDV38859	Post Medieval Pottery from Housing Estate on north side of Heppenstall Road, Barnstaple	Post medieval pottery was recovered from the surface of this site excavation in 1986.
27	MDV5513	Pilton, Westaway	Westaway & Westaway Cottage with a 18C core & the remains of a 17C cob farmhouse to the rear
28	MDV920	PAPER MILL in the Parish of Pilton West	Playford mill (paper). Opened 1889. Thick and thin wrapping paper made, also carpet felt. Closed 1906 owing to expense of installing new machinery local waste used (slee).
29	MDV924	PAPER MILL in the Parish of Shirwell	Blatchford paper mill. It was worked by william list in 1857 for pulping and rolling, employing twelve people. Continued to be worked into the 1880's making sugar papers, browns, royals and general grocery papers on a machine of 1.270m. It can be traced
30	MDV96340	WESTAWAY WESTAWAY COTTAGE	
31	MDV105061	Raleigh House, Barnstaple	Raleigh House shown on 1880s-1890s Ordnance Survey map.

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32	MDV105169	Stone barn, south-west of Shearford Lane	Stone barn, south-west of Shearford Lane, depicted on historic mapping.
33	MDV123095	Roborough House, West Pilton	Site of a country house that became a hotel in the later 20th century. It was destroyed by fire in the 1990s. Features within the former landscaped gardens around the house are still extant.
34	MDV133603	Footbridge, east of Anchor Mill Cottage, Barnstaple	A footbridge marked on Ordnance Survey mapping from 1890 and 1904.
35	MDV133604	Weir west of Westaway, Pilton West	A weir marked on Ordnance Survey mapping from 1890 and 1904 as 'Head Weir'.
36	MDV133605	Ford, west of Westaway, Pilton West	A ford marked on Ordnance Survey mapping from 1890 and 1904.
37	MDV133606	Quarry in Tutshill Wood, Pilton West	A quarry marked on Ordnance Survey mapping from 1890 and 1904 as 'Old Quarry'.
38	MDV133607	Well at Westaway, Pilton West	A well marked on Ordnance Survey mapping from 1890 and 1904.
39	MDV1570	Bridge over the Lynton and Barnstaple Railway, Frankmarsh	Former road bridge over the Lynton and Barnstaple Railway.
40	MDV32452	Summerhouse at Roborough, Pilton	Late 19th century rustic timber summerhouse.
41	MDV32818	Milepost on the Lynton and Barnstaple Railway	Site of a milepost on the Lynton and Barnstaple Railway.
42	MDV32822	Milestone on Westaway Plain, Barnstaple	Milestone situated at the junction of Youngs Drive and Westaway Plain. The milestone dates from about 1879 and is inscribed '1 BARUM' with a benchmark below. Barum is the medieval Latin name for Barnstaple.
43	MDV376	Barnstaple Water Works	Barnstaple Water Works reservoir built in 1858 with a pumping station installed by the early 20th century.
44	MDV377	Raleigh Mill, Pilton, Barnstaple	First recorded as a corn mill in 1699, Raleigh Mill was extended in the later 18th century to include cotton and worsted mills. The textile mills were largely destroyed by fire at the end of the century and in 1821 a lace factory was established on the
45	MDV378	Raleigh Cottages, Pilton, Barnstaple	A row of cottages built circa 1819 to house workers of the lace factory opposite.
46	MDV379	RAILWAY in the Parish of Barnstaple	The Lynton and Barnstaple railway. The only narrow gauge passenger railway in Devon, this line operated between 1898 and 1935 (minchinton). Opened 16/5/1898 a year later than scheduled. The railway paid a dividend from 1913-1921 but in 1922 a loss was made
47	MDV57460	Mill Race, Marwood	Mill Race marked on 1880s Ordnance Survey map.
48	MDV57973	Pilton Nurseries, Barnstaple	Site of Pilton Nurseries which formerly covered a large area on the north side of Pilton. The grounds have now been redeveloped for housing.
49	MDV57988	Raleigh Laundry, Barnstaple	Site of Raleigh Laundry on the north side of Raleigh Road.
50	MDV57989	Nursery Garden at Raleigh, Barnstaple	Site of a nursery garden on the north side of Raleigh between the leat and Raleigh Road. The site has now been partially developed for housing.
51	MDV63560	Leat to Raleigh Mills, Pilton, Barnstaple	Leat to Raleigh Mills, 2.5 kilometres long, from a weir on the River Yeo.
52	MDV63563	Waterwheels at Raleigh Mill, Pilton Barnstaple	The corn mill at Raleigh Mill is recorded as having two overshot waterwheels in the later 18th century, by the mid 19th century these had been replaced by a larger, single waterwheel. The carding and spinning houses, built in the later 18th century, also
53	MDV68213	Mill Leat to Halls, Lions and Bradiford Mills	A long leat shown on the 1880s-1890s 25 inch Ordnance Survey map which once served three mills along its length.
54	MDV69874	Leat, north of Bradiford Water, Pilton West	A leat marked on Ordnance Survey mapping from 1890 and 1904.
55	MDV80892	Sub Circular Enclosure, Tutshill	Sub circular enclosure, Tutshill. Visible on Ordnance Survey 1880s-1890s First Edition 25 inch map.
56	MDV923	The Old Mill, formerly Blakewell Mill, Marwood	Large former corn mill. There appears to be no evidence to support the suggestion that it was once a paper mill and as such burnt down in 1867. The present waterwheel came from Taunton Cider Works.
57	MDV32446	Milestone North of Blatchford	Milestone marked on historic and modern mapping
58	MDV32336	QUARRY in the Parish of Pilton West	
59	MDV32399	Well at Blakewell, Marwood	Site of a well.
60	MDV32406	QUARRY in the Parish of Shirwell	
61	MDV32407	WELL in the Parish of Pilton West	
62	MDV32430	WELL in the Parish of Pilton West	
63	MDV32431	WELL in the Parish of Pilton West	
64	MDV32433	WELL in the Parish of Pilton West	
65	MDV32435	WELL in the Parish of Pilton West	
66	MDV32436	QUARRY in the Parish of Pilton West	
67	MDV32437	WELL in the Parish of Shirwell	
68	MDV32440	FOOTPATH in the Parish of Shirwell	
69	MDV32442	QUARRY in the Parish of Shirwell	

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70	MDV32443	FORD in the Parish of Shirwell	
71	MDV32445	FORD in the Parish of Shirwell	
72	MDV57467	BOUNDARY STONE in the Parish of Shirwell	
73	MDV57468	BOUNDARY STONE in the Parish of Shirwell	
74	MDV114848	Archaeological Features, Land to the West of Youings Drive, Westaway Plain, Barnstaple	Geophysical survey undertaken on land to the west of Youings Drive identified a number of discrete and linear anomalies, indicating potential ditches and pits.
75	MDV115824	Geophysical Anomalies, Land north of Lynbro Road, Barnstaple	Geophysical survey undertaken on land north of Lynbro Road, Barnstaple. The survey recorded a
76	MDV32337	Weir near Tutshill Wood, Pilton West	Weir near Tutshill Wood, Pilton West. Marked on the Ordnance Survey 1880s-90s map.

TABLE 2: DETAILS OF DESIGNATED HERITAGE ASSETS SHOWN IN FIGURE 16 (HE)

No	List Entry	Name	Grade
1	1310848	Church Of All Saints	II
2	1328139	Parochial School	II
3	1328140	Compressor House And Chimney Opposite Technical College Site	II
1	1385078	Bull House	I
2	1385316	Parish Church Of St Mary The Virgin	I
3	1385277	36, Pilton Street	II*
4	1317999	Folly Approximately 100 Metres North Of Roborough House	II
5	1325569	Summer House And Terrace 80 Metres North Of Roborough House	II
6	1385006	Wynards Including Front Garden Wall And Railings And Gate	II
7	1385007	Bellaire Cottage	II
8	1385008	3, Bellaire	II
9	1385010	Bellaire House	II
10	1385077	Abbey Cottage	II
11	1107154	Blakewell Mill	II
12	1385079	Feoffee Cottages And Church Cottage	II
13	1385080	Medina	II
14	1385081	Pilton Abbey	II
15	1385082	Walls And Gate Piers And Gate To Pilton Abbey	II
16	1385121	Lake Cottage	II
17	1385122	Lake Cottages	II
18	1385123	Medelpad	II
19	1385124	Garden Walls And Gate Piers And Gates To Medelpad	II
20	1385125	Pilton Cottage	II
21	1385126	Walls And Gate Piers And Gates To Pilton Cottage	II
22	1385198	The Old School	II
23	1385249	Carlyon House	II
24	1385250	Gate Piers And Gate To Carlyon House	II
25	1385263	18 And 19, Pilton Street	II
26	1385264	Willesden House	II
27	1385265	21 And 22, Pilton Street	II
28	1385266	24, Pilton Street	II
29	1385267	Bryan House	II
30	1385268	K6 Telephone Kiosk Outside Number 25	II
31	1385269	26, Pilton Street	II
32	1385270	27, Pilton Street	II
33	1385271	Chichester Arms Public House	II
34	1385272	29, Pilton Street	II
35	1385273	30, Pilton Street	II
36	1385274	32, Pilton Street	II
37	1385275	33, Pilton Street	II
38	1385276	Churchill House	II
39	1379462	Northfield Cottage	II
40	1385278	37, Pilton Street	II
41	1385279	40, Pilton Street	II
42	1385280	The Rock And Attached Terrace Railings	II
43	1385281	The Rock Including Terrace And Garden Walls	II
44	1385283	The Rock	II
45	1385284	The Rock	II
46	1385285	Rock House The Rock	II
47	1385287	The Rock	II
48	1385288	80, Pilton Street	II
49	1385289	81, 81a And 82, Pilton Street	II

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50	1385290	Pilton Church Hall	II
51	1385291	86, Pilton Street	II
52	1385292	87, Pilton Street	II
53	1385293	Numbers 88 And 89 And Attached Wall	II
54	1385294	90 And 91, Pilton Street	II
55	1385295	92 And 93, Pilton Street	II
56	1385296	94, Pilton Street	II
57	1385297	95, Pilton Street	II
58	1385298	98, Pilton Street	II
59	1385299	99 And 100, Pilton Street	II
60	1385300	101, Pilton Street	II
61	1385308	Pilton House	II
62	1385309	Gate Piers And Walls To Pilton House	II
63	1163925	Westaway/Westway Cottage	II
64	1385317	Lady Well	II
65	1385318	Lychgate And Walls	II
66	1385319	Railings And Wall To The Old School To West Of South Porch Of Church Of St Mary	II
67	1385320	Railings To South Of Churchyard Path	II
68	1385321	Railings And Lamp And Gates To North Of Churchyard Path	II
69	1385381	Lake Almshouses	II
70	1385390	Milestone At Ss 561 345 At Corner Of Youings Drive	II
71	1002514	Burridge Hill fort	SM

TABLE 3: DETAILS OF ARCHAEOLOGICAL INTERVENTIONS IN FIGURE 17 (DHER)

No	Event ID	Event Name	Type
1	EDV4172	Roborough Road Evaluation & Watching Brief	Evaluation
2	EDV6280	Gradiometrey Survey, Land at Trayne Farm, Pilton West, Devon	Geophysical Survey
3	EDV6936	Geophysical Survey, Land to the West of Youings Drive, Westaway Plain, Barnstaple	Geophysical Survey
4	EDV7041	Geophysical Survey, Land North of Lynbro Road, Barnstaple	Geophysical Survey

SITE OF ROBOROUGH HOUSE HOTEL, PILTON, BARNSTAPLE, DEVON: HIA

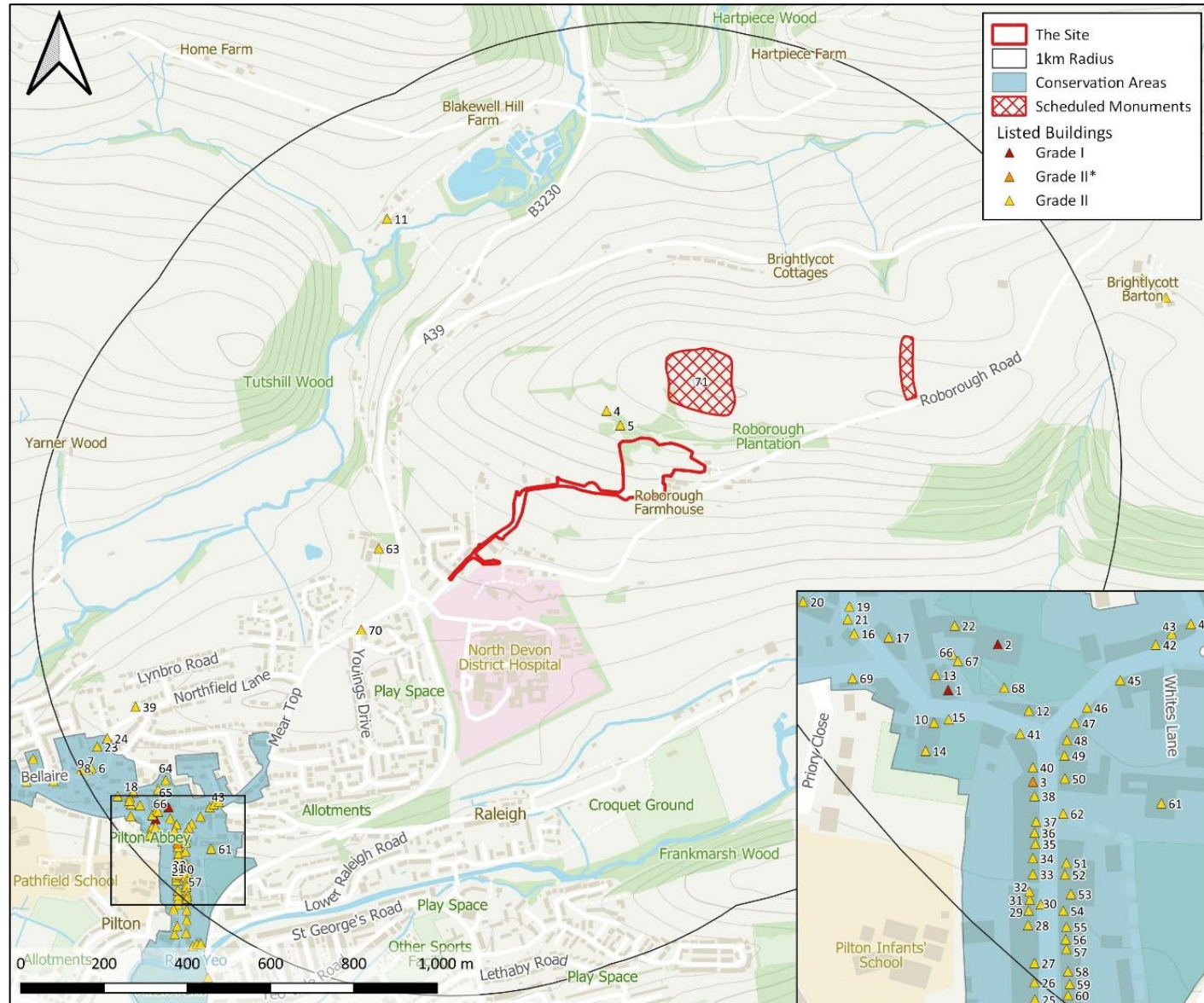


FIGURE 16: DESIGNATED HERITAGE ASSETS WITHIN 1KM OF THE PROPOSAL AREA RECORDED IN THE NATIONAL HERITAGE LIST FOR ENGLAND (NHLE) WITH INSET MAP SHOWING DETAIL OF CONSERVATION AREA © HISTORIC ENGLAND 2023. CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 20223

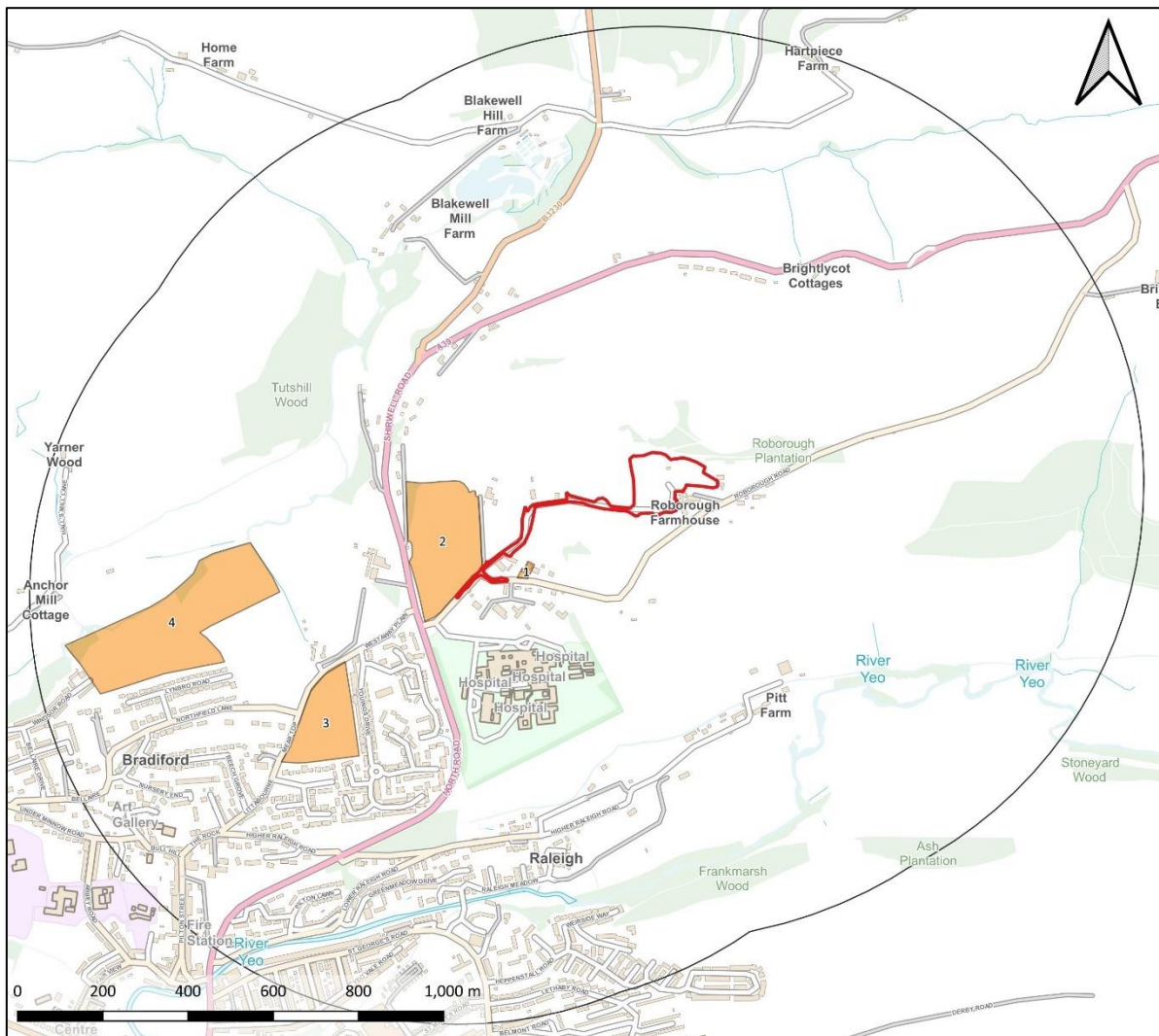


FIGURE 17: ARCHAEOLOGICAL INTERVENTIONS WITHIN 1KM OF THE PROPOSAL AREA RECORDED IN THE DEVON HER (CSHER) CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2023.

3.2 AERIAL PHOTOGRAPHY AND LIDAR

A review of readily available aerial photographs shows the site in 2001 (Figure 18) and 2022. The site is slightly more overgrown in the later photograph but there is little observable change on the site. The 2001 photo suggests some possible piles of rubble to the south west of the house, possibly related to demolition of the structure. This area was noted as undulating during the site visit however it is also a possible location of building shown on an 1845 historic map.



FIGURE 18: AERIAL PHOTO OF THE SITE FROM 2001; ©2023 INFOTERRA LTD & BLUESKY



FIGURE 19: AERIAL PHOTOGRAPH FROM 2022 ©2023 GOOGLE

LiDAR data is available at a survey interval of 1m for the site and surrounding area. While a 25cm interval is preferable for the identification of archaeological features, especially within woodland, a 1m resolution can be used, particularly for identifying larger archaeological features. The LiDAR data is a 2020 data set. LiDAR Digital Surface Model (DSM) (Figure 13) and Digital Terrain Model (DTM) (Figure 14) data has been processed and examined. Both data sets show the platform for the former Roborough House and driveway curving around in front. Little further detail is shown due to the high level of vegetation over much of the site.

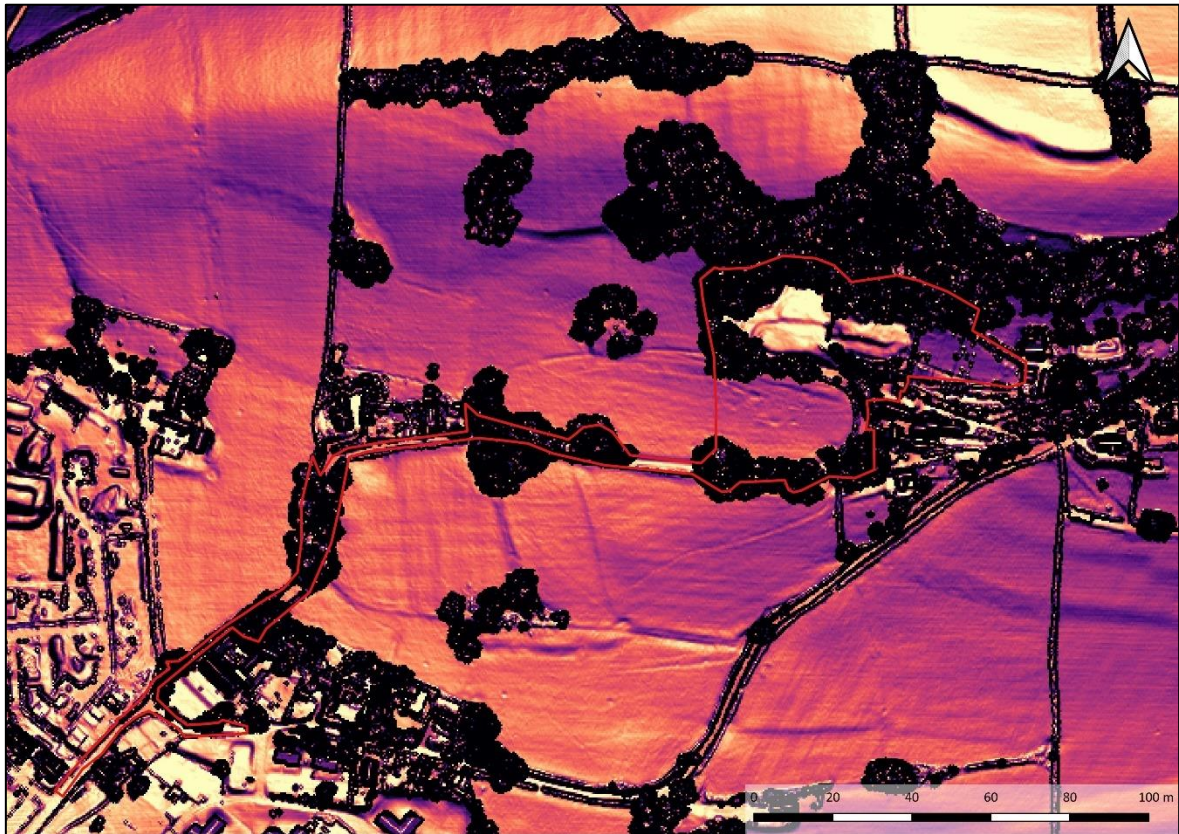


FIGURE 20: 1M LIDAR DSM FIRST RETURN DATA. PROCESSED USING QGIS 3.22 SLOPE_2. CONTAINS ENVIRONMENT AGENCY DATA USED UNDER THE OPEN GOVERNMENT LICENSE 3.0.

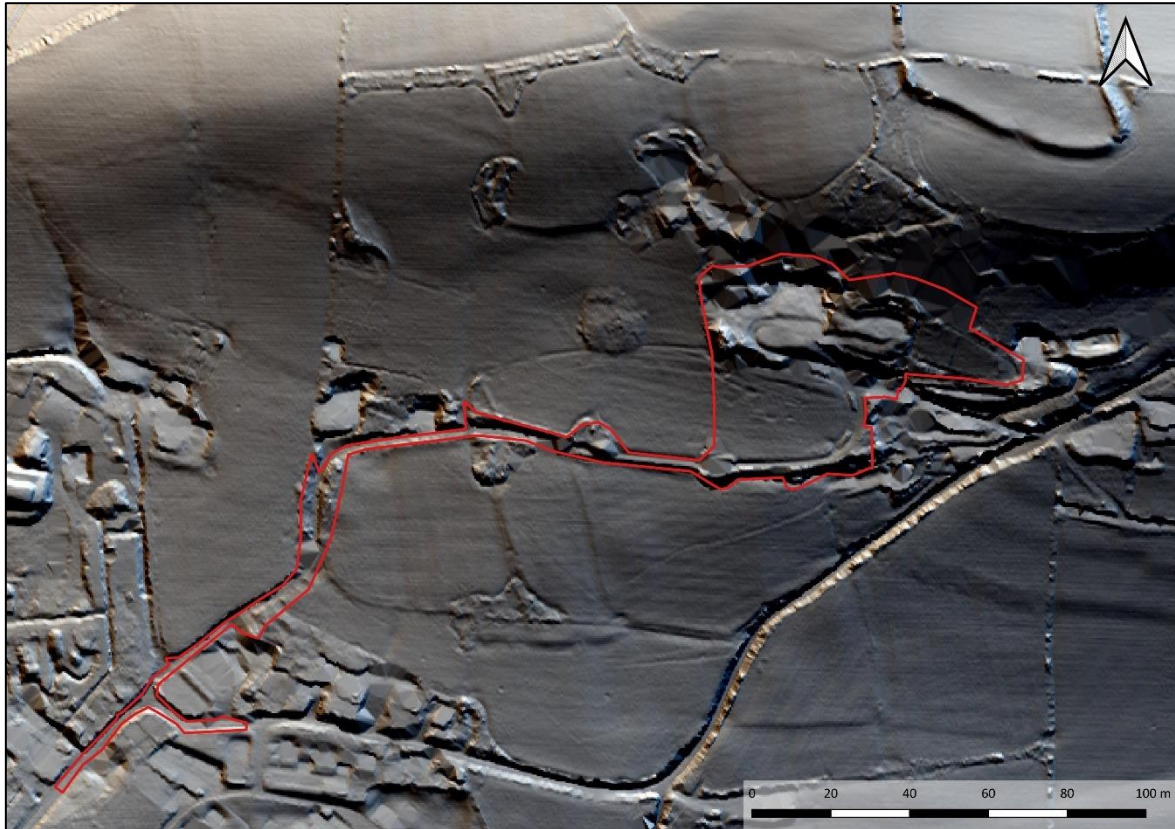


FIGURE 21: 1M LIDAR DTM DATA. PROCESSED USING QGIS 3.22 MULTIHILLSHADE 315_35_2. CONTAINS ENVIRONMENT AGENCY DATA USED UNDER THE OPEN GOVERNMENT LICENSE 3.0.

3.3 WALKOVER SURVEY

A walkover survey of the site was undertaken on the 24th November 2023 in variable overcast/drizzly to sunny conditions. The site comprises the former Roborough House Hotel, previously Roborough House and surrounding gardens. It was a 19th century pocket estate above the borough town of Barnstaple. The site consists of the footprint of buildings which were demolished following a significant fire in the 1990s and sits within its own designed landscape gardens. The house and designed landscape appear to be largely of one phase and intrinsically connected to each other in significance; an understanding of the house cannot be obtained without an understanding of its designed landscaped surroundings and vice versa. Indeed, the gardens appear to be more complex and noteworthy than the house (based on surviving photographic images) and may express more of the motivations and aspirations of its owners, the Brown family, during the later 19th century.

The site historically had two access routes, a long snaking driveway from the south-west, past Raleigh House and Roborough Cottage and a shorter driveway from the south-east, the more historic access, passing through the farm buildings of the estate and clearly converted to a secondary, service access. Railed estate fencing survives along most of the driveway, with the original stone piers at its entrance. Parallel lines of large mature trees hint at a former avenue at the upper end; the entrance to the site is enclosed by a five bar gate. The drive sweeps around in a dramatic curve from south-west to south-east directly south of the site, with lawned terraced banks running down to the driveway. Crenelated walls divide compartments in the gardens to the east of the site of the house and are a design feature within this pocket landscape.

The boundaries to the north, north-west and west: the woodlands, bordered with surviving but damaged iron estate-railed fencing and later post and wire replacement fencing. Beyond are open pasture fields with the typical small clumps and copses of mature native species or specimen conifer

trees associated with landscaped parklands. Now however, the grassland is used agriculturally for commercial grazing, divided by wire and post fencing.

To the north-east the wooded mid and lower slopes of the ridge continue but the boundary between the retained part of the estate and the sections sold and tenanted is of modern fencing. To the east and south-east the estates service ranges including barns, kitchen courtyard and farm house frame the immediate approach to the former dwelling house site, now partially screened by trees and hedges, clearly planted to define the boundaries. The estate cottages, some converted from agricultural buildings, which line the former drive entrance have all been sold and are in separate ownerships.

The site itself has been disused for a number of years after the hotel building was damaged by fire and demolished in the later 1990s although there is evidence that the site has been routinely maintained, with the grass cut and access to the landscaped sylvan pleasure grounds to the northern side of the house maintained. It is evident that the designed landscape of paths and walks shown on the First Edition Ordnance Survey survives to an exceptional extent within the woodland around the house, despite vegetation growth the built form of the paths could clearly be seen. A full description of the gardens has not been attempted due to the limitations of the scope of this report. The folly and summerhouse area appeared to be in a relatively good state of preservation; although the wooden building described in the listing description of the summerhouse is no longer extant, there was a substantial gothic style ruin stone building surviving in this location. The built walls of the pathways consisted of local shale or white quartz blocks and larger quartz blocks have also been utilised at termini or meeting points of paths. The remains of the vinery building was also evident within the gardens, standing almost to full height at its northern side. Several features such as curved walls, possibly to permit a seat, niches and a pointed arched spring heads have been incorporated into the build of the paths and walks within the landscaped gardens. To the northern side of the summer house a substantial sunken feature incorporating paths and built walling may represent a fernery or similar sunken garden. The gardens and house location were clearly located and designed with outward views in mind and the summer house and folly locations within the gardens would afford extensive views outwards over Barnstaple and the Taw estuary if trees which have grown up in front were removed. Overall the condition of the built walls and structures in the gardens is considered to be very good with some limited maintenance required to bring them back into a safe and usable condition. The gardens have a very 'designed' single phase feel and it would be surprising if they were not the work of a garden designer – more work to establish any known garden designers working in this area during this period is needed to attempt to establish this.



FIGURE 22: VIEW FROM THE SOUTH WEST TOWARDS THE LOCATION OF ROBOROUGH HOUSE WITH REMAINING WALLS AND STEPS TO LANDSCAPED GARDENS IN CENTRE GROUND.



FIGURE 23: SURVIVING BUILDINGS TO THE EAST OF THE HOUSE SITE, RECORDED AS GARAGE IN THE EARLY 20TH CENTURY BUT LIKELY ORIGINALLY A GARDENER'S STORE.

There is little remaining of Roborough House itself with evidence that the rear (northern elevation) was constructed straight onto the bedrock at the back of the platform on which it sits. There was limited evidence of phasing within the surviving remains of the house in the form of a round brick

arched doorway apparently truncated by two rendered brick walls which limited access into the archway.



FIGURE 24: LIMITED EVIDENCE FOR PHASING WITH BRICK WALLS BUILT IN FRONT OF STONE AND BRICK ARCH (FROM THE SOUTH)



FIGURE 25: EXTENSIVE VIEWS ACROSS BARNSTAPLE AND TAW ESTUARY FROM THE ARCHED GATEWAY INTO THE LANDSCAPED GARDENS FROM THE GARDEN TO THE EAST OF THE HOUSE



FIGURE 26: STONE BUILT PIERS NEAR ENTRANCE TO THE LANDSCAPED GARDENS. FROM THE NORTH WEST.



FIGURE 27: STONE BUILT GOTHIC STYLE RUINS IN LOCATION OF LISTED SUMMERHOUSE WITHIN THE LANDSCAPE GARDENS (FROM THE WEST)



FIGURE 28: LISTED FOLLY WITHIN LANDSCAPE GARDENS (FROM THE SOUTH)

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.

There is extensive evidence of a building on the site of the proposed development, Roborough House, which may have incorporated an earlier building potentially of 18th century date. There is also evidence of a building to the south west of Roborough House, on the area proposed as the car parking space. The proposed development footprint has been overlain on the Second Edition Ordnance Survey map and shows the car parking area is located partly within the landscaped gardens, which would cause loss of the extant fabric (Figure 29). The archaeological potential of the site is considered to be high. Damage to archaeological deposits would be considered **permanent/irreversible**. Mitigation could be managed through relocation of the car park to the south, to avoid damage to the historic landscape gardens and a planning condition for archaeological monitoring and recording during groundworks. Further recommendations and mitigation measures are suggested at the end of this report.

TABLE 4: SUMMARY OF DIRECT IMPACTS.

Asset	Type	Distance	Value	Magnitude of Impact	Assessment	Overall Assessment
Direct Impacts						
Unidentified archaeological features	Non-deg.	On site	Medium	Major	Moderate/Large	Moderate Adverse

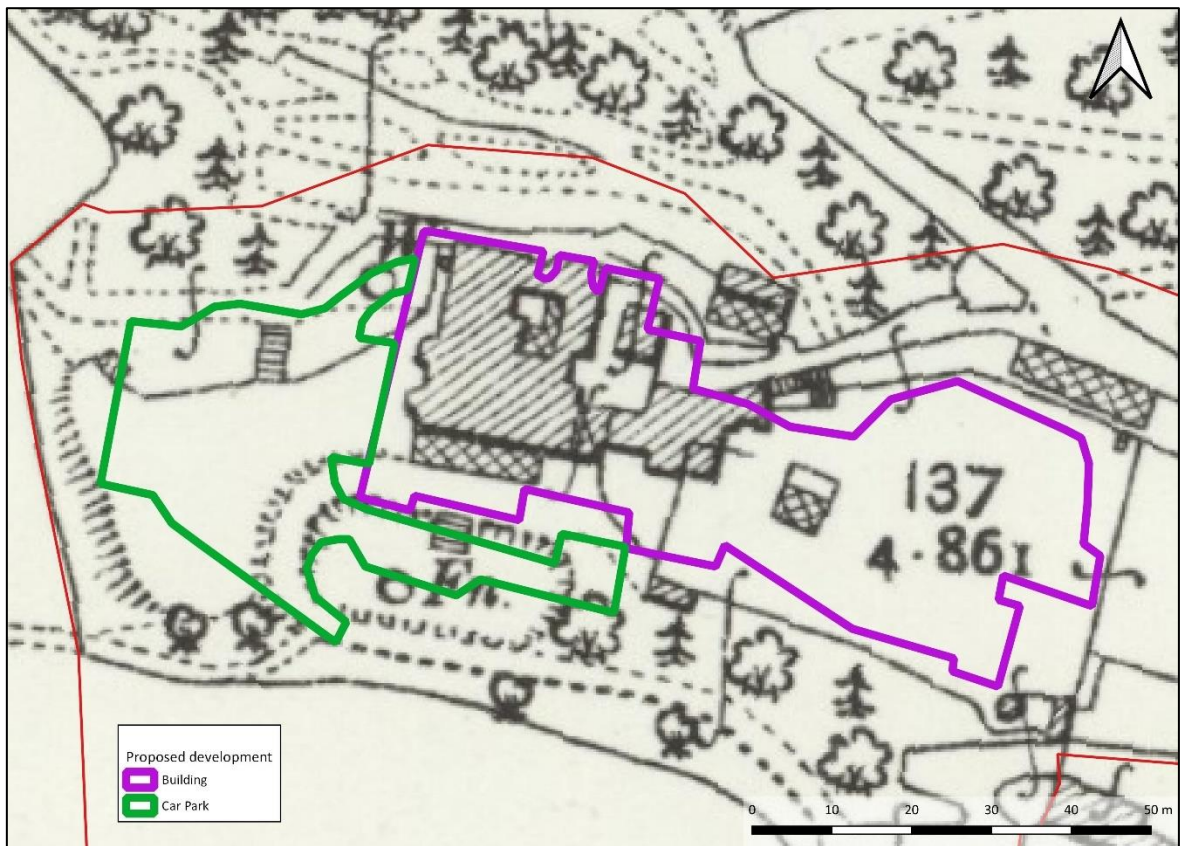


FIGURE 29: PROPOSED BUILDING AND CAR PARK FOOTPRINT OVERLAIN ON SECOND EDITION MAP (NLS) SHOWING OVERLAY WITH GARDEN ENTRANCE, HISTORIC POND AND FOUNTAIN.

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 70 Listed Buildings, one Scheduled Monument and one Conservation Area within 1km of the site.

The only designated heritage assets selected for assessment were Burr ridge Hill Fort, Summerhouse and Terrace at Roborough and Folly at Roborough. The park and garden at Roborough has been considered as a non designated heritage asset of equal value and significance to a designated Registered Park and Garden (Grade II). Based on perceived value and location relative to the site, these have been treated as a *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: Folly at Roborough, Summerhouse and Terrace, Burr ridge Hillfort, Park and Garden at Roborough House
- Category #2 assets: None

4.3 IMPACT BY CLASS OF MONUMENT OR STRUCTURE

4.3.1 HILLFORTS

Hillforts, tor enclosures, cross dykes, promontory forts

Hillforts are large, embanked enclosures, most often interpreted as fortifications, and usually occupy defensible and/or visually prominent positions in the landscape. They are typically visible from all or most of the surrounding lower and higher ground, with the corollary that they enjoyed extensive views of the surrounding countryside. As such, they are as much a visible statement of power as they are designed to dissuade or repel assault. The location of these sites in the landscape must reflect earlier patterns of social organisation, but these are essentially visual monuments. They are designed to see and be seen, and thus the impact of wind turbines is often disproportionately high compared to their height or proximity.

Tor enclosures are less common, and usually only enclose the summit of a single hill; the enclosure walls is usually comprised of stone in those instances. Cross dykes and promontory forts are rather similar in nature, being hill spurs or coastal promontories defended by short lengths of earthwork thrown across the narrowest point. Both classes of monument represent similar expressions of power in the landscape, but the coastal location of promontory forts makes them more sensitive to visual intrusion along the coastal littoral, due to the contrast with the monotony of the sea. Linear earthworks are the cross dyke writ large, enclosing whole areas rather than individual promontories. The investment in time and resources these monuments represent is usually far greater than those of individual settlements and hillforts, requiring a strong centralised authority or excellent communal organisation.

Asset Name: Burridge Hillfort	
Parish: Pilton, North Devon	Value: High
Designation: SAM	Distance to Development: 90m
<i>Description: Listing Text: The slight univallate hillfort north east of Roborough Farmhouse survives well and has a separate outlying outwork which makes it more unusual. It will contain important archaeological and environmental evidence relating to its construction, use and landscape context. The scheduling, which falls into two separate areas of protection, includes a slight univallate hillfort with outwork situated on a prominent ridge between the valleys of the River Yeo and a tributary to the River Taw. The monument survives as an irregular shaped enclosure measuring up to 126m long by 110m wide internally defined by a rampart and partially buried ditch. A further linear outwork 400m to the east survives as a rampart measuring 150m long and up to 1m high, with its partially buried eastern quarry ditch being up to 0.5m deep.</i>	
<i>Conservation Value:</i> The hillfort sits amongst fields and woodland on the edge of the designed landscape of a small 19th century pocket estate. Its setting is of quite a pleasing rural aesthetic, but the monument's shallow banks have no defined visual profile. The site has no communal value but some historical illustrative value as part of the narrative of the establishment of settlement in this area and as part of the designed landscape which leads to it. The main conservation value ascribed to the site is its evidential value, the below ground archaeological deposits which will be sealed within the site and under/within its banks.	
<i>Authenticity and Integrity:</i> The site is divided by post medieval hedgebanks, within an actively farmed location, so it no longer retains a single enclosure profile. The integrity of the hillfort is quite high, as the outer rampart survives as a bank, even if it is weathered, and the feature retains a physical presence as an enclosure and noticeable archaeological feature in the landscape.	
<i>Setting:</i> The post medieval landscape of large irregularly shaped fields on a high ridge bears no resemblance to the exposed open setting this monument would originally have had. It now lies on the edge of a woodland landscape garden although retains extensive views outwards.	
<i>Contribution of Setting to the Significance of the Asset:</i> Its setting is largely its immediate surroundings; the wider setting is of limited value to the asset, the principle value of which lies in its below ground deposits.	
<i>Magnitude of Effect:</i> There is no intervisibility between the scheduled monument and the proposed site. It is screened by the woodland gardens which occupy the land north of Roborough House.	
<i>Magnitude of Impact:</i> High Value asset + No change = Neutral.	
<i>Magnitude of Impact:</i> Neutral Impact	



FIGURE 30: VIEW THROUGH THE WOODLANDS AT THE NORTH END TOWARDS TO THE FIELD WHICH CONTAINS THE HILLFORT; FROM THE SOUTH-SOUTH-WEST.

4.3.2 PARKS AND GARDENS

In/formal planning tends to be a pre-requisite for registered landscapes, but varies according to individual design. Such landscapes can be associated with larger stately homes (see above), but can be more modern creations. Landscape parks are particularly sensitive to intrusive visual elements (see above), but many gardens are usually focused inward, and usually incorporate stands of mature trees that provide (seasonal) local blocking. Unless the proposed wind turbine is to be located close to the garden, its impact would be minimal.

What is important and why

Parks and gardens can be extensive, and are usually associated with other high-value heritage assets. They may contain a range of other associated structures (e.g. follies, grottos etc.), as well as important specimen planting (evidential). Individual examples may be archetypes of a particular philosophy (e.g. picturesque) or rare survivors (e.g. medieval garden at Godolphin) (historical/illustrative). Parks that cover an extensive area can incorporate and utilise existing monuments, structures and biota of varying date and origin. They may have their origins in the medieval period, but owe their modern form to named landscape gardeners of national importance (e.g. Capability Brown). They may be depicted in art and lauded in poetry and prose (all historical/associational). The landscape park is the epitome of aesthetic/design: the field of view shaped and manipulated to conform to a particular ethos or philosophy of design; this process can sweep away what went before, or adapt what is already there (e.g. Trewithen Park). Planned views and vistas might incorporate distinctive features some distance removed from the park. Many of these parks have been adapted over time, been subject to the rigours of time, and have fully matured in terms of the biological component. The communal value of these landscapes is limited; in the present day some are open to the public, but in origin and conception they were essentially the playgrounds of the elite. They might contain or incorporate commemorative structures (communal/commemorative).

Asset Name: Folly Approximately 100 Metres North of Roborough House	
Parish: Pilton, North Devon	Value: Medium
Designation: Grade II	Distance to Development: c.75m
Summary: <i>Listing Text: Folly, late C19, in form of Gothic castle ruin. Rubble stone. Small partially constructed battlemented tower with round arched window and low crenellated curtain wall to south and east. One of various elements forming a sylvan landscaped garden to Roborough House.</i>	
Conservation Value: Designed specifically as part of a romantic sylvan wooded pleasure ground, serving the pocket estate of Roborough House; served by sunken paths retained by slate herringbone walls. The expected visual links through the woodlands, the designed vistas, are currently lost due to the lack of maintenance however have the potential to be restored through vegetation management. Very aesthetically pleasing and 'gothic' in character. There is some inherent evidential value within the structure itself on its construction methods. It has a strong historical illustrative value in the narrative of the development of Roborough House and the fortunes and aspirations of its inhabitants. No known designer is currently associated with the gardens at Roborough House however given the extent and seemingly single phase of the design it is possible with further research the design and layout could be attributed. Given the links between the wife of George Brown (Isabel De Courcy Palmer) and the Palmer family of Great Torrington and Reynolds family – her great grandmother was Mary Palmer (nee Reynolds) and her great great uncle was Sir Joshua Reynolds – it is possible that the family may have had connections which influenced the design and layout of the gardens at Roborough.	
Authenticity and Integrity: Very authentic as an abandoned garden folly. The historic integrity is quite high, with the site appearing largely intact with relatively minimal maintenance required; clearance of fallen trees would aid its conservation.	
Setting: The folly occupies the top, north-west part of the inner wooded pleasure ground. It is enclosed within a small parkland landscape of sweeping pasture with scattered mature copses of native species. The folly relates to its immediately enclosing romantic sylvan setting, served by sunken paths with decorative	

quartz detailing and framed by exotic specimen shrubs. It also appears to have been designed to have extensive views outwards towards the Taw estuary and Barnstaple which are somewhat interrupted at present by vegetation growth. The setting is aping that of larger established country houses, but is on a smaller, more middle class scale.

Likely Effects: The proposed development is set at some distance to the south west of this folly, which itself lies within sylvan pleasure gardens. The trees surrounding it to the south west would provide screening from the development; the folly would not have had views to Roborough House when extant.

Contribution of Setting to Significance of Asset: The romantic woodland setting defines the picturesque character of the pleasure grounds, formerly creating the classic reveal and conceal progress towards the delightful mock-Gothic ruins. Its setting is therefore of paramount importance in revealing the significance of this heritage asset.

Magnitude of Impact: There is the potential that development of the Roborough House site could have a beneficial impact on this folly if the landscaped gardens were brought back into appropriate management to provide enjoyment for the residents of the site. Conversely any harm to the gardens would by extension affect the setting of this Listed building. The current proposals require the removal of the entrance to the gardens to create a car park; this would therefore be seen as a negative impact on the setting of this Listed building. Loss or damage to the setting of this listed building through removal of part of the seemingly single phase garden design in which it sits may constitute substantial harm to the significance of the Listed building through loss of its setting. Modifications to the design, shifting the car parking slightly to the south could allow for a more beneficial impact on the heritage asset.

Overall Impact Assessment: Medium Value asset + either Moderate Adverse or Moderate Beneficial Change
= **either Moderate Adverse or Moderate Beneficial**



FIGURE 31: FOLLY VIEWED FROM THE SOUTH (NO SCALE).



FIGURE 32: CONSTRUCTION OF THE CRENELATED WALL OF THE FOLLY (FROM THE EAST; 1M SCALE).



FIGURE 33: VIEW OUT TOWARDS THE TAW ESTUARY FROM THE FOLLY, IN NEED OF VEGETATION MANAGEMENT TO PERMIT INTENDED VISIBILITY (FROM THE EAST).

Asset Name: Summer House and Terrace 80 Metres North of Roborough House	
Parish: Pilton, North Devon	Value: Medium
Designation: Grade II	Distance to Development: c.36m
<i>Summary: Listing Text: Rustic timber summerhouse. Late C19 with wheat-reed thatched conical roof supported on uprights of tree branches with bark. 3 bays at front open and back infilled with halved branch ribs and infill forming fanned vaulting pattern supported on little rustic branch brackets. Around back wall is bench on rustic timber posts and shaped central table on central post. Summerhouse set on front of a terrace with retaining wall rounded in plan in shale rubble with four-centred arch opening and narrow slits either side in the form of a ruin. Brick-vaulted and lined inside. One of various elements forming a sylvan landscaped garden to Roborough House.</i> The wooden element of the summerhouse as described in the listing text appears largely not to be extant with only the brick element remaining. The terrace is in better condition and can be appreciated as a gothic ruin but part of the brick vault beneath has been broken through/collapsed and is in need of repair. It is possible this was the feature interpreted as an ice house in the 1983 sales particulars for the Roborough House Hotel. The site is currently quite overgrown to the north, separating it from the sunken garden feature it may have looked out on and making the form of this feature difficult to discern.	
<i>Conservation Value:</i> Designed specifically as part of a romantic sylvan wooded pleasure ground, serving the pocket estate of Roborough House; served by sunken paths retained by slate herringbone walls. The summerhouse and terrace were designed to be aesthetically pleasing and to achieve pleasing vistas outward, looking through the wooded grounds and across the park with borrowed views to the wider Taw estuary, somewhat lost at present due to the lack of maintenance however have the potential to be restored through vegetation management. The terrace has as 'gothic' character. It likely has evidential value in its construction. It has a strong historical illustrative value in the narrative of the development of Roborough House and the fortunes and aspirations of its inhabitants. No known designer is currently associated with the gardens at Roborough House however given the extent and seemingly single phase of the design it is possible with further research the design and layout could be attributed. Given the links between the wife of George Brown (Isabel De Courcy Palmer) and the Palmer family of Great Torrington and Reynolds family – her great grandmother was Mary Palmer (nee Reynolds) and her great great uncle was Sir Joshua Reynolds – it is possible that the family may have had connections which influenced the design and layout of the gardens at Roborough.	
<i>Authenticity and Integrity:</i> The wooden summerhouse has been lost other than its rear brick element. The terrace is still quite authentic and appears abandoned, but clearly identifiable, and its historical integrity level is high, with a small amount of damage to its brick vaulted room.	
<i>Setting:</i> The romantic woodland setting defined the picturesque character, as well as the entertainment function of the pleasure grounds. The designed setting approached along sunken paths created the classic <i>reveal and conceal</i> progress towards the delightful mock-Gothic ruins, with little glimpses through the trees widening the viewshed of the terrace and using it as an eye-catcher as well as a folly-style summerhouse and entertaining space for picnics. Much of the intended setting is currently hidden by the growth of vegetation in the area. The summerhouse relates to its immediately enclosing romantic sylvan setting, served by sunken paths with decorative quartz detailing and framed by exotic specimen shrubs. It also appears to have been designed to have extensive views outwards towards the Taw estuary and Barnstaple which are somewhat interrupted at present by vegetation growth. The setting is aping that of larger established country houses, but is on a smaller, more middle class scale. The summerhouse site is clearly deliberately sited immediately adjacent to an apparent sunken garden, possibly a fernery of similar, currently very overgrown.	
<i>Likely Effects:</i> The proposed development is set to the south west of the summerhouse site, which itself lies within sylvan pleasure gardens. The trees surrounding it to the south west would provide screening from the development; the summerhouse would not have had views to Roborough House when extant.	
<i>Contribution of Setting to Significance of Asset:</i> The romantic woodland setting defines the picturesque character of the pleasure grounds, formerly creating the classic reveal and conceal progress towards the delightful mock-Gothic ruins. Its setting is therefore of paramount importance in revealing the significance of this heritage asset.	

Magnitude of Impact: There is the potential that development of the Roborough House site could have a beneficial impact on the summerhouse and terrace if the landscaped gardens were brought back into appropriate management to provide enjoyment for the residents of the site. Conversely any harm to the gardens would by extension affect the setting of this Listed building. The current proposals require the removal of the entrance to the gardens to create a car park; this would therefore be seen as a negative impact on the setting of this Listed building. Loss or damage to the setting of this Listed building through removal of part of the seemingly single phase garden design in which it sits may constitute substantial harm to the significance of the listed building through loss of its setting. Modifications to the design, shifting the car parking slightly to the south could allow for a more beneficial impact on the heritage asset.

Overall Impact Assessment: Medium Value asset + either Moderate Adverse or Moderate Beneficial Change
= **either Moderate Adverse or Moderate Beneficial**



FIGURE 34: VIEW OF THE TERRACE ON WHICH THE SUMMERHOUSE WAS LOCATED, ITSELF A RUINED FOLLY FORM (FROM THE WEST)



FIGURE 35: REMAINING BRICK ELEMENTS OF THE SUMMERHOUSE (FROM THE NORTH WEST; 1M SCALE).



FIGURE 36: SUMMERHOUSE TERRACE VIEWED FROM THE SUMMERHOUSE LOCATION. COLLAPSED BRICK VAULTED ROOF OF GROUND FLOOR LEVEL VISIBLE (FROM THE EAST 1M SCALE).

Asset Name: Park and Gardens at Roborough House	
Parish: Pilton, North Devon	Value: Medium
Designation: Non designated heritage asset	Distance to Development: Within
Summary: The sylvan landscaped gardens at Roborough House represent an unusual survival of this type of designed landscape within North Devon. The stone and quartz lined paths offer a number of routes through the sylvan landscape and a zigzag path leads out of the gardens towards Burr ridge hill fort. The paths survive as shown on the Ordnance Survey First Edition map and include a listed folly and summerhouse with terrace (discussed above) providing extensive views out across the Taw estuary. The gardens clearly have a number of other well designed viewpoints and incorporate the use of large quartz blocks at junctions of paths and crenelated walling design throughout. Niches and arched spring head features are encountered along the paths and a sunken garden with terraced walling lies adjacent to the summerhouse and terrace, although currently much overgrown. A vinery is also located in the southern part of the woodland gardens, to the north of the house. The gardens lead towards and arched doorway into a garden compartment adjacent to the former house site with magnificent far reaching views over the tree line toward the Taw and Barnstaple. Two compartments separated by crenelated walls, one with a tower built into it, form the kitchen and fruit gardens. The apparent high quality single phase design of the garden along with its links to the occupants of Roborough House, the Brown family, who were notable members of late 19th century Barnstaple society suggests a garden designer may likely have been employed to achieve the design and layout of this site. Given the links between the wife of George Brown (Isabel De Courcy Palmer) and the Palmer family of Great Torrington and Reynolds family – her great grandmother was Mary Palmer (nee Reynolds) and her great great uncle was Sir Joshua Reynolds – it is possible that the family may have had connections which influenced the design and layout of the gardens at Roborough. Historic England state in their criteria for Listing of Parks and Gardens <i>‘the presence of garden buildings and structures such as walls and steps [will strengthen a case for listing]. This will especially be so where those structures are listed’</i>. Overall the high level of preservation is relatively unique for a garden of this period in North Devon and could be considered likely to be of a quality and standard comparable to a Grade II Listed Registered Park and Garden. A map from the early 20th century was located in the North Devon Record Office indicating the usage of every building at Roborough at the date of its sale and showing water pipes and routes throughout the garden. It is relatively unusual to have such a detailed documentary record, accompanying historic mapping and extant gardens from this period which conform seemingly exactly to the documentary detail. Conservation Value: The gardens have high aesthetic value as a designed landscape and will contain high evidential value in their built form. They have historical illustrative value in their links to the narrative of the Brown Family and the development of the Roborough Estate. Although no known garden designer is currently associated with Roborough, it is likely that there would have been some design input into these gardens and the links with the Palmer and Reynolds families suggests a historical associational value to the gardens. As a former hotel the site may have some communal value. Authenticity and Integrity: The gardens have high authenticity and integrity with good survival of paths and built elements. Some limited maintenance is required to clear vegetation and restore them to their former state however as rustic woodland gardens they would never have been manicured or over maintained and therefore the maintenance required is relatively limited. Setting: The landscaped gardens provide the setting and backdrop for Roborough House and in some ways are of greater significance than the house itself, which appears to have been relatively plain, in contrast to the ‘gothic’ elements of the gardens. The gardens are surrounded by open land and small copses of trees, all designed to permit extensive views outwards towards the Taw estuary at carefully designed locations. Likely Effects: The proposed development is largely set on the footprint of Roborough House. It is proposed to reset or reuse the present garden entrance steps as part of the development to enable the required access. The proposed development would extend beyond the footprint of Roborough House to the east, necessitating the removal of the section of crenelated wall dividing the house from the first garden compartment and filling much of this compartment with the new development. The removal of the remaining garden buildings in this area would also be necessitated by the proposals. The development does however bring some positive benefits if the restoration of the gardens were to be incorporated as part of the proposals; the site is currently derelict and the restoration of these gardens could be seen as a public benefit.	

<i>Contribution of Setting to Significance of Asset:</i> The romantic woodland setting defines the picturesque character of the pleasure grounds, formerly creating the classic reveal and conceal progress towards the delightful mock-Gothic ruins. Its setting is therefore of paramount importance in revealing the significance of this heritage asset.
<i>Magnitude of Impact:</i> There is the potential that development of the Roborough House site could have a beneficial impact on the woodland gardens if they were brought back into appropriate management to provide enjoyment for the residents of the site. Conversely the construction of the development over the first garden compartment would lead to the loss of this garden space, which is arguably of less significance as a fruit garden. The current proposals require the removal of the entrance to the gardens to create a car park; this would therefore be seen as a substantial adverse impact on the significance of this heritage asset. It is also unclear whether some of the garden wall and path to the north of the Roborough House platform would also be removed as part of the development. The construction of a two storey building in front of the arched doorway leading from the gardens and clearly one of the main viewpoints out from the gardens would also significantly reduce appreciation of their significance. Modifications to the design have been recommended which could allow for a more beneficial impact on the heritage asset. At present however the development is assessed as having an adverse impact.
<i>Overall Impact Assessment:</i> Medium Value asset + Moderate Adverse = Moderate Adverse

4.3.3 SITE SPECIFIC IMPACT

The landscaped gardens around Roborough House are a non-designated heritage asset, the value and significance of which appears only to have been partially appreciated in the designation of two garden buildings within the landscaped gardens. Roborough House and its gardens appear to have evolved at the same time and under the same ownership; the significance of one cannot be understood in isolation but requires consideration as a whole entity. The extent of the garden design in contrast to what appears to have been a comfortable but relatively plain and modest house suggests the likelihood of a known garden designer having some involvement in the plan and layout of these relatively complex but seemingly single phase gardens. It is likely that the Roborough Estate developed as the status of members of the Brown family increased in the mid to late 19th century. Given the links between the wife of George Brown (Isabel De Courcy Palmer) and the Palmer family of Great Torrington and Reynolds family – her great grandmother was Mary Palmer (nee Reynolds) and her great great uncle was Sir Joshua Reynolds – it is possible that the family may have had connections which influenced the design and layout of the gardens at Roborough. Whilst Roborough House has largely gone, just two walls remaining, one built against the bedrock on the northern side, the surviving fabric and extensive gardens can offer a glimpse of the aspirations and motivations of an aspiring middle status family in North Devon in the 19th century. Whilst some documentary research has been carried out as part of this assessment it is possible that a greater depth of research may uncover more about the story of Roborough and enable its history to be pieced together more fully.

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 proposed site would be constructed within the *Secluded Valleys* Landscape Character Area (LCA). The Secluded Valleys Landscape Character Type is characterised by steep-sided, v-shaped valleys with fast-flowing streams and rivers carving through the landscape, crowned by rounded hill summits. Dense tree cover cloaking valley sides and patches of wet woodland tracing river/stream courses.

The site also comprises a historic designed landscape which has lost its principle building. The development of the proposed site will replace the former building with another, although larger in footprint, extending eastwards into the former kitchen garden. This will replace the focal point of the landscaped grounds of the site and reinstate a large building in this location in views, although likely different in architectural style. On that basis the impact on the historic landscape is assessed as **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. Substantial residential development has recently taken place to the west of the site at Trayne Farm and the site of Barnstaple Hospital lies to the south. This represents an encroachment outwards from the settlement of Barnstaple into areas previously occupied by farmsteads and hamlets. As a result the cumulative impact of this development on heritage assets in this area is considered **negligible 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 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 5: SUMMARY OF IMPACTS AND EFFECTS

Asset	Type	Distance	Value	Scale of Change	Significance of Effect	Professional Judgement
Category #1 Assets						
Folly approximately 100m north of Roborough House	GII	c. 75m	Medium	Moderate Adverse	Moderate Adverse	Moderate Adverse
Summerhouse and Terrace at Roborough House	GII	c.36m	Medium	Moderate Adverse	Moderate Adverse	Moderate Adverse
Park and Gardens at Roborough House	GII	within	Medium	Major Adverse	Moderate Adverse	Moderate Adverse
Burridge Hillfort	GII	90m	High	No Change	Neutral	Neutral
Landscape Character						
Historic Landscape	n/a	n/a	High	Minor	Slight or Moderate	Minor Adverse
Aggregate Impact	n/a	n/a				Negligible Adverse
Cumulative Impact	n/a	n/a				Negligible Adverse

4.3.8 RECOMMENDATIONS AND MITIGATION

Based on the current plans proposed for a residential care home facility on the site of the former Roborough House Hotel the following recommendations and mitigation measures are made:

- The scheme included for the restoration of the landscaped gardens. This is an essential benefit of the development and part of the offering being made by the planning application for this facility. This includes the crenelated walls around the eastern and south-eastern parts of the site including the tower, as well as the woodland gardens. This should be carried out in consultation with the relevant specialists and agencies. This is to ensure the coherence of house and gardens is maintained and that although the original house is no longer extant the gardens can be read in their context as part of a 19th century pocket estate. The gardens have the potential to add substantial benefits to residents e.g. through health and wellbeing, whilst restoration and maintenance of the gardens and their listed and non-designated structures (e.g. the vinery) would be considered to have a public benefit.
- The proposed car park has following discussions now been reduced in size and relocated slightly to the south so that it does not cause loss of the historic landscaped garden paths. It is likely that the garden steps may need to be re-set/re-used but this is likely an acceptable compromise to ensure the survival of the overall character and setting of the gardens and pathways.
- The proposed eastern part of the new building extends into the first garden compartment, whilst this is not ideal in heritage terms, as it extends far beyond the footprint of the original Roborough House, the viability of the scheme requires a footprint of this size. The proposals therefore need to be managed to minimise the loss of historic walls and paths, ensuring that as much as possible these are still retained, and incorporated within the design.
- The building within the first garden compartment should be of a height that it does not prevent the extensive views outwards from the arched doorway leading from the woodland gardens into this location, as this is one of the principal view's outwards from the gardens. The roof level will therefore need to be similar to that of which the former peach (glass)

houses. The proposed green roof will further help soften the building in views from this important garden view.

- It is recommended that a full record of the extant gardens at Roborough House is made by a suitable person with a knowledge of 19th century gardens. Further research into the gardens may be able to clarify whether a known garden designer was involved in their design and construction. The Devon Gardens Trust would be appropriate to consult to determine whether any previous survey work has been carried out.
- Archaeological recording of the remaining structures which would be demolished as part of the proposed development including the crenelated section of garden wall with blocked arched opening should be carried out prior to any development on the site.
- Archaeological monitoring and recording of demolition and ground works on the site would enable recording of any further details on the structure of Roborough House and determine whether any remains of the buildings shown on the 1845 map exist.
- No recommendations on design and appearance have been made within the scope of this report however local and national design guidance should be referred to and consideration of the status of the former Roborough House and the design elements used in its landscape would also be appropriate as part of the design process.

If the above recommendations and mitigation, including restoration and recording work on the gardens were carried out as part of the proposed development the overall potential heritage impact of this development could be considered Major Beneficial.

5.0 CONCLUSION

The site lies to the north-east of Pilton in the historic manor of Raleigh. The adjacent manor of Pilton was established as an Anglo Saxon borough. The manor of Raleigh passed from the family of Raleigh to Chichester in 1362 then to the Champney, Hooper and Basset families. It was purchased in the late 18th century by Robert Newton Incledon Esq. of Pilton House. The old Raleigh Court was located on the site of the present Barnstaple Hospital, and was replaced in the 18th century by Raleigh House. Several documents held at the North Devon Record Office refer to Roborough in the earlier post medieval period although they do not specifically reference buildings within the landholding. An 1832 document clearly names two tenements at Roborough in reference to tithes although the tithe map and apportionment for Pilton appears to omit Roborough, for an unknown reason. An 1845 map does however show several buildings at Roborough, indicating there was a substantial dwelling established on the site at this date. Whether it was a large farmhouse or small country house is unknown. The 1841 census shows one property named Roborough occupied by three agricultural labourers. Since there is map evidence for a relatively large house on the site just after this date it is possible therefore that either the house was constructed between 1841 and 1845, the house was of relatively low status in 1841 and was used only as housing for agricultural labourers or else the agricultural laborers lived on another dwelling at the site and any owner or occupant of the house was away at the date of the census so would not have been recorded at this address. By 1850 Roborough is occupied by a Farmer named Thomas Brown, who has three house servants and four farm servants suggesting either substantial expansion or rebuilding of the property may have occurred between 1841 and 1850. The Brown family retained ownership of Roborough until the early 20th century with George Brown, a land agent and JP, connected through his wife to the notable Palmer family of Great Torrington, recorded as head of the household for much of the later 19th century. Roborough Farm and several cottages are recorded in later 19th century census data.

The Roborough Estate appears likely to have been sold as lots some time before 1939, the farm and most of the cottages entering into separate ownership. The house became a hotel sometime after 1971 and suffered a substantial fire in the 1990s after which the building was demolished. Sales particulars for Roborough House Hotel from 1983 show it as a large square white painted and rendered building with slate roof with a projecting wing to the east; it appears identical in form to the building shown on the First and Second Edition Ordnance Survey maps. The sales particulars state the house to be Georgian, presumably based on its appearance, however the historic mapping suggests that much of the house is likely to post date 1845. It appears probable, based on photographs of the house taken in the 1990s following a fire however that the north, west and south elevations represent surviving parts of the earlier C shaped building shown on an 1845 map, subsequently incorporated into a larger courtyard house. The house has extensive woodland gardens accompanying it which appear to be of one phase and contemporary with the extension of the house. As a house set within a designed landscape the house and garden derive their significance from each other.

The proposed development would see the construction of a residential care home on the footprint of Roborough House and extending into the first garden compartment. The current proposals would see the re-siting or reuse of the entrance into the woodland garden designed landscape to facilitate access. An assessment of impact on heritage assets in the vicinity of the site has been carried out. Whilst the development would have a limited impact on many of the heritage assets in the landscape surrounding it, the current proposals would constitute a relatively major impact on the heritage assets in closest proximity to the site. The archaeological potential of the site is considered high. The indirect impact of the current proposals is considered **moderate adverse** however recommendations and mitigation measures have been proposed which, if fully implemented, could see the development assessed as major beneficial.

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APPENDIX 1: SUPPORTING PHOTOGRAPHS



1. VIEW FROM THE DRIVEWAY DIRECTLY UP HILL, THIS WOULD HAVE BEEN THE FIRST CRUCIAL FULL VIEW TO THE FORMER 'POCKET' ESTATE; FROM THE SOUTH.



2. THE FORMER STABLES, COACH HOUSE AND KITCHEN GARDEN COURT, AS WELL AS THE HOME FARM; FROM THE WEST-NORTH-WEST.



3. VIEW FROM THE FORMER STABLES AND BARN'S UP THE DRIVEWAY TO THE FORMER HOUSE'S LOCATION; FROM THE SOUTH-EAST.



4. VIEW ALONG THE RAISED EARTHWORK BANK, WITH SURVIVING FOUNDATION STONES OF THE FRONT WALL, DEFINING THE LIMITS OF THE HOUSE; FROM THE WEST.



5. VIEW ACROSS SITE OF FORMER ROBOROUGH HOUSE AND ENTRANCE TO GARDENS; FROM THE WEST (NO SCALE).



6. SURVIVING EASTERN WALL OF ROBOROUGH HOUSE; THIS AREA WAS PART OF THE MID TO LATER 19TH CENTURY EXTENSION TO THE BUILDING AND APPEARS TO HAVE HAD A SERVICE FUNCTION WITH IRON FITTINGS STILL LOCATED IN THE WALLS (FROM THE SOUTH WEST)



7. PART OF SURVIVING EASTERN WALL OF ROBOROUGH HOUSE SHOWING DIVISION OF THIS SPACE INTO COMPARTMENTS, POSSIBLY STABLING (FROM THE SOUTH WEST)



8. FITTINGS IN REAR (NORTH) WALL OF ROBOROUGH HOUSE SUGGESTING A BOILER OR RANGE IN THIS LOCATION (FROM THE SOUTH)



9. REAR (NORTH) WALL OF ROBOROUGH HOUSE SHOWING BRICK BUILT ONTO BEDROCK. FIREPLACE SHOWING TWO PHASES OF BLOCKING (FROM THE SOUTH)



10. THE TERRACE WALLS TO THE NORTH-EAST SHOWING A CURVING SET OF STEPS RUNNING UP TOWARDS THE KITCHEN GARDENS; FROM THE WEST.



1. REMAINS OF BUILDING TO SOUTH WEST OF ROBOROUGH HOUSE SHOWN ON HISTORIC ORDNANCE SURVEY MAPS; VIEWED FROM THE EAST (1M SCALE).



11. MOUNDS OF STONEY MATERIAL, POSSIBLY FROM HOUSE TO SOUTH WEST OF HOUSE PLATFORM; VIEWED FROM THE NORTH WEST (1M SCALE)



12. ENTRANCE STEPS AND WHITE QUARTZ WALL FORMING ENTRANCE TO WOODLAND GARDENS; PROPOSED FOR REMOVAL TO ACCOMMODATE A CAR PARK AS PART OF THE DESIGN PROPOSAL; FROM THE SOUTH (1M SCALE)



13. WATER PIPE SUPPLYING WATER TO FOUNTAIN SHOWN IN THIS AREA ON HISTORIC MAPPING (FROM THE SOUTH)



14. REMAINS OF HOUSE WITH SYLVAN PLEASURE GROUNDS BEHIND, WHITE QUARTZ WALLING VISIBLE (FROM THE SOUTH EAST)



15. GARDEN BUILDINGS SHOWN ON HISTORIC MAPPING AND SECTION OF WALLING DIVIDING HOUSE FROM FIRST GARDEN COMPARTMENT. ALL OF THESE ELEMENTS WOULD BE REMOVED TO ACCOMMODATE THE PROPOSED BUILDING . ARCHED DOORWAY IN FAR GROUND PROVIDES ALTERNATIVE ENTRY/EXIT FROM THE WOODLAND GARDENS AND FORMS A SIGNIFICANT VIEWPOINT (FROM THE SOUTH)



16. CRENELATED GARDEN WALL TERMINATING OVER THE ROOF OF THE LARGER SURVIVING GARDEN BUILDING (FROM THE EAST)



17. EVIDENCE OF ATTEMPTS TO 'RUSTICATE' THE SMALLER OF THE TWO SURVIVING GARDEN BUILDINGS IN THE FIRST GARDEN COMPARTMENT (FROM THE SOUTH)



18. ARCHED DOORWAY PROVIDING ONE OF TWO ENTRANCE/EXIT POINTS TO THE GARDENS (FROM THE SOUTH)



19. VIEW FROM FIRST GARDEN COMPARTMENT TOWARDS ROBOROUGH HOUSE SITE WITH CRENELATED GARDEN WALL SHOWN WITH BLOCKED ARCHED DOORWAY AND ROUND TURRET DETAILING AT TERMINUS; A COKE HOUSE WAS LABELLED ON HISTORIC MAPPING IN THIS AREA. THIS WALL IS PROPOSED FOR DEMOLITION TO ACCOMMODATE A LARGER BUILDING FOOTPRINT (FROM THE EAST)



20. DECORATIVE QUARTZ ROCKERY AND TERRACING AROUND THE POND TO THE WEST OF THE FORMER HOUSE SITE; FROM THE SOUTH-EAST.



21. SMALL ARCHED WELL-HEAD TYPE STRUCTURE OVER PIPEWORK FOR WATER FEATURE AND POND BELOW, ON THE UPPER REAR TERRACE, NORTH-WEST OF THE FORMER HOUSE; FROM THE SOUTH-WEST.



22. ENTRANCE PATH INTO WOODLAND GARDENS FROM STONE STEPS TO THE WEST OF THE HOUSE. EXTANT STONE ENTRANCE PIERS IN NEED OF VEGETATION MANAGEMENT (FROM THE NORTH WEST)



23. SUNKEN GARDEN FEATURE TO THE NORTH OF THE SUMMERHOUSE WITHIN THE WOODLAND GARDEN AT ROBOROUGH HOUSE WITH POSSIBLE CENTRAL ISLAND (FROM THE SOUTH)



24. HERRINGBONE PATTERN STONE BUILT TERRACES VISIBLE FROM WITHIN THE SUNKEN GARDEN NORTH OF THE SUMMERHOUSE (FROM THE WEST)



25. FUNNEL SHAPED ENTRANCE INTO THE SUNKEN GARDEN FROM THE PATH LEADING PAST THE SUMMERHOUSE (FROM SOUTH)



26. CIRCULAR NICHE CREATED IN STONE ALONG PATH BETWEEN SUMMERHOUSE AND FOLLY, FORMED FROM VERTICALLY SET STONE (FROM WEST)



27. STONE BUILT CURVING ENTRANCE TO SUNKEN GARDEN (FROM THE WEST)



28. LARGE QUARTZ BLOCK MARKING MEETING OF TWO PATHS IN THE NORTHERN PART OF THE WOODLAND GARDEN (FROM THE EAST)



29. PATH LEADING DOWN FROM FOLLY WITH MOUND, POSSIBLY A VIEWPOINT ON RIGHT HAND SIDE OF IMAGE (FROM THE NORTH WEST)



30. STONE BUILT WALLING RETAINING ZIG ZAG PATHS WITHIN THE GARDENS (FROM THE NORTH WEST)



31. SUBSTANTIAL SURVIVING BUILT FORM TO WALLING OF PATHS WITHIN THE GARDEN AND QUARTZ BLOCK AGAIN PLACED AT MEETING OF TWO PATHS (FROM THE SOUTH EAST)



32. CURVED SECTION OF WALLING ALONG PATH, POSSIBLY TO PERMIT A FEATURE OR VIEWPOINT (FROM THE EAST)



33. ANOTHER CURVED AREA OF WALLING OBSERVED ALONG A PATH NEAR THE VINERY SHOWING EXCELLENT CONDITION OF THE WALLING (FROM THE SOUTH EAST)



34. DETAIL OF ARCHED DOORWAY PERMITTING ACCESS TO AND FROM THE WOODLAND GARDENS ON THE WESTERN SIDE OF THE HOUSE, WITH CRENELATED TOP AND EVIDENCE OF A DOOR FRAME (FROM THE SOUTH EAST)



35. CAREFULLY REVEALED VIEW FROM ARCHED DOORWAY WITH SPECIMEN TREES, GARDEN WALLS AND EXTENSIVE VIEWS BEYOND (FROM THE NORTH). THE PROPOSED DEVELOPMENT WOULD RESULT IN THE LOSS OF THIS VIEWPOINT BY BLOCKING THE ARCHED DOORWAY WITH A TWO STOREY BUILDING.



36. WELL PRESERVED REMAINS OF THE VINERY, JUST NORTH OF ROBOROUGH HOUSE WITH EVIDENCE OF A CHIMNEY IN THE CENTRAL SECTION OF THE REAR WALL.



37. FURTHER EVIDENCE OF ALTERNATION OF STONE AND QUARTZ AS A WALL BUILDING MATERIAL, PATH IMMEDIATELY BEHIND ROBOROUGH HOUSE (FROM THE EAST)



38. STONE BUILT ARCHED STRUCTURE UNDER A PATH JUST NORTH OF THE HOUSE. MAY HAVE BEEN CONSTRUCTED AT A SPRING LOCATION SHOWN ON AN EARLY 20TH CENTURY MAP (FROM THE SOUTH)



39. EXIT FROM ZIG ZAG PATH TO HILLFORT (ON RIGHT) JOINING PATH RUNNING BEHIND HOUSE. SLITS IN THE CRENELATED WALL (LEFT) ALLOW GLIMPSES OF EXTENSIVE VIEWS OUTWARDS ACROSS BARNSTAPLE (FROM THE EAST)



40. VIEW EAST ALONG THE PATH WHICH RUNS BEHIND THE KITCHEN GARDEN; FROM THE WEST.

APPENDIX 2: IMPACT ASSESSMENT METHODOLOGY

Heritage Impact Assessment - Overview

The purpose of heritage impact assessment is twofold: Firstly, to understand – insofar as is reasonably practicable and in proportion to the importance of the asset – the significance of a historic building, complex, area or archaeological monument (the ‘heritage asset’). Secondly, to assess the likely effect of a proposed development on the heritage asset (direct impact) and/or its setting (indirect impact). The methodology employed in this assessment is based on the approaches advocated in *Managing Significance in Decision-Taking in the Historic Environment* [GPA2 Historic England 2015] and *The Setting of Heritage Assets 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 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

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>.

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

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

For designated heritage assets, which have been designated *because* they are deemed significant, Step 1 is relatively straightforward, and Step 2 is also, to a degree quantified, as the determination of significance, to a greater or lesser extent, took place then the heritage asset was 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 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*

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.

harm. The bar for substantial harm was set at a very high level in 2013 by the case *Bedford BC v SSCLG38*. However, following a recent High Court 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.

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;

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.

Hierarchy of Value/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 6: 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.

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.

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*.

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 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

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.

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.

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 is 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.

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.

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

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

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 Listing for individual structures varies, particularly for Grade II structures; for instance, it is not always clear why some 19th

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>.

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.

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.

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*.

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.

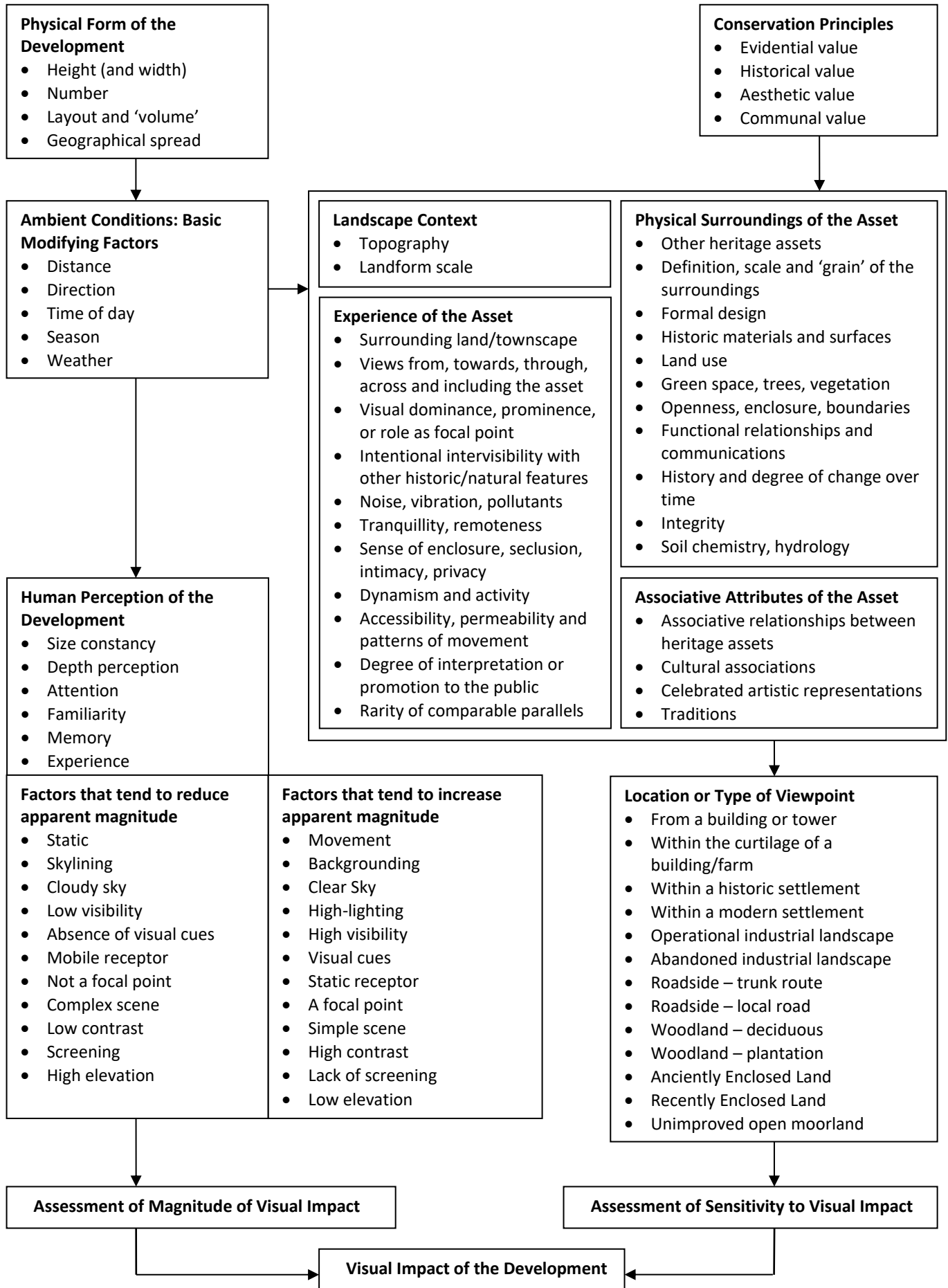


TABLE 7: THE CONCEPTUAL MODEL FOR VISUAL IMPACT ASSESSMENT PROPOSED BY THE UNIVERSITY OF NEWCASTLE (2002, 63), MODIFIED TO INCLUDE ELEMENTS OF *ASSESSMENT STEP 2* FROM THE SETTING OF HERITAGE ASSETS (HISTORIC ENGLAND 2017, 11, 13).



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