

Land at Lower Laston Field, Ilfracombe, Devon

Heritage Assessment



SOUTHWEST ARCHAEOLOGY

Heritage Consultancy

Land at Lower Laston Field, Ilfracombe, Devon

Heritage Assessment

Executive Summary

This report presents the results of a heritage scoping assessment for a proposed residential development on land at Lower Laston Field, Ilfracombe, North Devon

The assessment concluded that the direct impact of any development of this site for residential use is likely to be low whilst some indirect impacts are expected based on the proximity of nearby heritage assets; the extent of this would depend on the design and scale of any development. Recommendations have been made at the end of this report which would help to ensure any adverse impacts for residential development of this site is minimised.

Whilst any development of this site is considered unlikely to require further archaeological mitigation, detailed assessment of heritage impacts should be undertaken during the design process and once greater information on the intended design, scale and massing is decided.

Client	Vye Property Partnership
Agent	PCL Planning Ltd
Parish	Ilfracombe
County	Devon
NGR	SS5268547468
Site Code	IL24
Report No.	241030
Version No.	01
Date	30 th October 2024
Status	Final
Report Author(s)	F. Balmond BA MA MCifA
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Data Location	SWARCH FILES/ActiveJobs/SwarchLtd/Ilfracombe Larkstone IL24
OASIS No.	southwes1-528794
Acknowledgements	The landowner and Agent

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1 INTRODUCTION

1.1 PROJECT BACKGROUND

South West Archaeology Ltd. (SWARCH) was instructed by PCL Planning (the Agent) to prepare a heritage assessment (HA) for a proposed residential development on land at Lower Laston Field, Ilfracombe.

1.2 LOCATION

The proposal site is located at the eastern edge of Ilfracombe, c.170m south of the coast. The A399 lies along the south western boundary of the site.

1.3 TOPOGRAPHY, GEOLOGY AND SOILS

The site forms a triangle of land which slopes from south west to north east between the A399 Hillsborough Road and Larkstone Lane. Larkstone Terrace lies to the north west of the site. The elevation varies between c.114m AOD on the western edge of the site and 72m AOD on the eastern side. The soils of this area were not surveyed by the Soil Survey of England and Wales, as they lie within an urban area¹. The bedrock comprises slates of the Kentisbury Slates Member².

1.4 SCOPE AND CONTEXT

The proposals are still at a masterplan stage, with no detail of building forms, scales and massing available. This report is therefore an initial assessment which seeks to feed into an iterative design process by highlighting the most archaeologically sensitive areas of the site, and indicating where mitigation measures including further archaeological work is likely to be needed to inform the design and layout of the development.

¹ SSEW 1983: *Legend for the 1:250,000 Soil Map of England and Wales*.



FIGURE 1: LOCATION MAP CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2024

1.5 DEVELOPMENT PROPOSALS

The proposals are currently at masterplan stage, with proposals for an unspecified number of residential units, pending the assessment of heritage and other constraints on the site.

² BGS 2024: <https://geologyviewer.bgs.ac.uk>

1.6 CONSULTATION

This document is produced for consultation with relevant stakeholders as part of an iterative process.

1.7 METHODOLOGY

The desk-based research and archaeological assessment were undertaken in accordance with the relevant guidance and in line with the SWARCH HA methodology³.

1.8 LIMITATIONS AND CAVEATS

A site visit was not undertaken during this initial scoping phase, which was intended only to provide advice on likely heritage constraints on any development.

1.9 QUALITY ASSURANCE

This assessment has been undertaken by South West Archaeology Ltd. (SWARCH) is a Registered Organisation (RO) with the Chartered Institute for Archaeologists (CIfA) and a member of the Federation of Archaeological Managers & Employers (FAME). SWARCH employees working on this project are appropriately qualified academically and commercially; SWARCH directors hold doctoral qualifications in archaeology and are Members (MCIfA) of the Chartered Institute for Archaeologists.

1.10 PREVIOUS WORK

The site has not been subject to any archaeological investigation and only very limited archaeological fieldwork has occurred within the surrounding area. A geophysical survey has been undertaken for land to the west of the site and a study of lime kilns included a site to the north of the proposal site. A Second World War emergency water supply reservoir is recorded in the southern area of the site in the Devon Historic Environment Record.

³ SWARCH 2024: *Impact Assessment Methodology v.2.02*.

2 POLICY AND LEGISLATION

2.1 STATUTORY LEGISLATION

<i>Ancient Monuments and Archaeological Areas Act 1979</i>	<i>Confers a duty on the Secretary of State to maintain a Schedule of monuments of national importance and areas of archaeological importance. It is a criminal offence to carry out unauthorised works or to destroy or cause damage to a monument covered by this act as well as to metal detect without written consent.</i>
<i>Planning (Listed Buildings and Conservation Areas) Act (1990)</i>	<p><i>Part 1 confers a duty on the Secretary of State to maintain a List of buildings of special architectural or historic interest and provides a statutory duty to preserve the special character of heritage assets covered by this act, including their setting. It is a criminal offence to carry out works to a Listed Building which affect its character without the necessary authorisation.</i></p> <p><i>It requires consideration of the contribution a building makes to any group of buildings of which it forms part (group value).</i></p> <p><i>Part 2 requires local authorities to designate as Conservation Areas, areas of special architectural or historic interest. It requires that special attention is paid to preserving or enhancing the character or appearance of these areas in exercising planning functions</i></p>
<i>Treasure Act (1996)</i>	<i>Defines 'treasure' as: any object except a coin, over 300 years old with a metallic content of at least 10% precious metal, one of two or more coins found together meeting these criteria or one of at least 10 coins over 300 years old. It also makes provision for objects found in association with the above. There is a duty to notify the coroner of any find or acquisition of an object which may be covered by this act.</i>

<i>Burial Act (1857)</i>	<i>Covers the removal of human remains from a burial place and requirement for consent, often in the form of a license issued by the Ministry of Justice</i>
<i>Hedgerow Regulations (1997)</i>	<i>Contains criteria for the protection of 'important' hedgerows. This includes hedgerows marking a boundary of at least on historic (pre 1850) parish or township; is included in the schedule of monuments under the Ancient Monuments and Archaeological Areas Act 1979; is wholly or partly within a site which falls under this act or on land adjacent to and associated with any monument or feature on such a site; marks a boundary of a pre-1600AD estate or manor or is visibly related to any building or other feature of such an estate or manor; is recorded as an integral part of a field system pre dating the Inclosure Acts or is part of/related to any building or feature associated with such as system.</i>
<i>Historic Buildings and Ancient Monuments Act (1953)</i>	<i>Established the provision of a register of gardens of special historic interest</i>
<i>National Heritage Act (1980, amended 1983 & 1997)</i>	<i>1980: Established a National Heritage Memorial Fund 1983: Established the Historic Buildings and Monuments Commission for England (now Historic England) with responsibility for overseeing heritage management and reporting to the Secretary of State.</i>
<i>Electricity Act 1989</i>	<i>Requires regard to the desirability of protecting sites, buildings and objects of architectural, historic or archaeological interest</i>

2.2 NATIONAL PLANNING POLICY FRAMEWORK

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 195: 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 200: 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 201: 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 203: In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.*

Paragraph 205: When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 206: Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

Paragraph 207: Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

Paragraph 208: Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Paragraph 209: The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Paragraph 212: 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.

Paragraph 213: 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 207 or less than substantial harm under paragraph 208, 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.

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

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

2.3 LOCAL POLICY

North Devon and Torridge [2011-2031]

The following policies in The North Devon and Torridge Plan 2011-2031 apply to the proposed development:

Policy DM07: Historic Environment

(1) All proposals affecting heritage assets should be accompanied by sufficient information, in the form of a Heritage Statement, to enable the impact of the proposal on the significance of the heritage asset and its setting to be properly assessed. As part of such an assessment, consideration should be given, in order of preference, for avoiding any harm, providing enhancement, then minimising and mitigating any harm.

(2) Proposals which conserve and enhance heritage assets and their settings will be supported. Where there is unavoidable harm to heritage assets and their settings, proposals will only be supported where the harm is minimised as far as possible, and an acceptable balance between harm and benefit can be achieved in line with the national policy tests, giving great weight to the conservation of heritage assets.

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

(a) there is no significant harm or degradation of historic fabric including traditional windows; and

(b) equivalent carbon dioxide emission savings cannot be achieved by alternative siting or design that would have a less severe impact on the integrity of heritage assets.

Policy ST15: Conserving Heritage Assets:

Great weight will be given to the desirability of preserving and enhancing northern Devon's historic environment by:

(a) conserving the historic dimension of the landscape;

(b) conserving 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.

⁴ Cf the staged approach to proportionate decision making in: Historic England 2017: *GPA3: The Setting of Heritage Assets* (p6). Step one is to identify the heritage assets that might be affected by a development. See also Principle A of CHIA as defined in: IEMA, IHBC & ClfA 2021: *Principles of Cultural Heritage Impact Assessment in the UK*.

3 HERITAGE ASSESSMENT

This report, a *heritage assessment*, provides the baseline information required to assess the potential *direct* and *indirect* impacts of the proposed development.

For direct impacts (i.e. harm caused to the buried archaeological resource), it draws on existing sources of information (the local historic environment record, historical records, maps, aerial photographs, LiDAR), supplemented by observations made during a walkover survey, to arrive at an assessment of archaeological potential. If and as required, this may include recommendations for further work.

For indirect impacts (i.e. harm caused through change to setting), it identifies the designated heritage assets in the local area (Listed buildings, Scheduled monuments, Conservation Areas, Parks and Gardens, Battlefields, World Heritage Sites) where, due to location, aspect, prospect, design or other factors, there is the potential for harm. The assessment identifies if further work might be necessary, and which assets should be subject to more detailed assessment⁴; it may conclude that no further assessment is warranted.

This fulfils the first part of the process of impact assessment, i.e. 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 ('heritage asset') in accordance with best practice and appropriate guidance⁵. Where further works are recommended, this may require a further, and more formal, process of heritage impact assessment.

⁵ English Heritage 2008: *Conservation Principles*. Historic England 2017: *GPA3: The Setting of Heritage Assets*. Historic England 2019: *Statement of Heritage Significance: Analysing Significance in Heritage Assets*. HEAN 12. IEMA, IHBC & ClfA 2021: *Principles of Cultural Heritage Impact Assessment in the UK*.

4 DIRECT IMPACTS

4.1 CARTOGRAPHIC DEVELOPMENT

The 1804 surveyors draft map for Barnstaple (Figure 3) shows limited detail but indicates Ilfracombe as a long linear settlement, beginning to branch out along some of the major routeways. The site lies to the east of the settlement, located adjacent to a small settlement possibly labelled Larkstone.



FIGURE 2: EXTRACT FROM THE 1804 SURVEYORS DRAFT MAP FOR BARNSTAPLE. THE APPROXIMATE SITE IS INDICATED (BL)

The 1840 Tithe Map for Ilfracombe (Figure 3) shows the site and the surrounding area in greater detail than the previous cartographic sources. The tithe map indicates that the site comprised one field and part of another. Roads are visible on the western and eastern sides of the site. The only development appears to be cottages to the south eastern and southern sides of the site (Larkstone Cottage and The Thatched Cottage) and Laston House to the south west. The tithe apportionment indicates that the land comprising the site (plots 41 and part of 34) was owned and occupied by Sir Bourchier Palk Wrey.

Plot 41 was named *Meadow end of Quay Field* whilst plot 34 was named *Quay Field*. Both were under arable cultivation. A quay appears to the north of the site, north of a lime kiln depicted on the tithe map.



FIGURE 3: EXTRACT FROM THE 1840 TITHE MAP FOR ILFRACOMBE (TNA). THE APPROXIMATE SITE LOCATION IS INDICATED.

TABLE 1: EXTRACT FROM THE 1839 TITHE APPORTIONMENT FOR ILFRACOMBE. THE PLOTS WITHIN THE SITE AREA ARE SHADED.

Plot	Landowner	Occupier	Plot Name	Cultivation
34	Sir Bourchier Palk Wrey	In hand	Quay Field	Pasture
39	Catherine Copner	In hand	House, Lawn and Garden	-
40	Sir Bourchier Palk Wrey	Charles Dennis	Plot	Arable
41		In hand	Meadow end of Quay Field	Pasture
42		Charles Dennis	Lime Kiln and approach	-
43		Humphrey Beavins	Larkstone Cottage, Garden and Pleck	-

45	Catherine Copner	Richard Bligh	Larkstone Cottage Summer House and Garden	-
46				Pasture
48	Sir Bourchier Palk Wrey	Charles Dennis	Lime Kiln and approach	Arable

The 1888 Ordnance Survey First Edition Map shows significant change took place in this area in the mid-19th century with the terrace of houses to the north (Laston Terrace) and villas to the east, west and north west of the site constructed in this period. At the northern end of Laston Terrace was Tawstock House; the Palk Wrey family seat was at Tawstock and presumably references their ownership of the land on which it was built. The land comprising the site appears undeveloped, with no visible features marked, whilst around the site are a network of lanes and relatively rectilinear field enclosures. To the west of the site, the approach to Laston House is shown as wooded.

The 1903 Second Edition Ordnance Survey map shows more limited development; the construction of some additional villas and terraces in the wider landscape is evident. A spring is marked just south of the proposal site boundary. Figure 6 shows Tawstock House and The Mount had become hotels by the mid-20th century. Further residential development is evident in the landscape around the site, with a sports ground to the north east. No development is shown within the site itself. Slight straightening of Hillsborough Road appears to have occurred by the date of this map. Laston Terrace had also been renamed Larkstone Terrace.

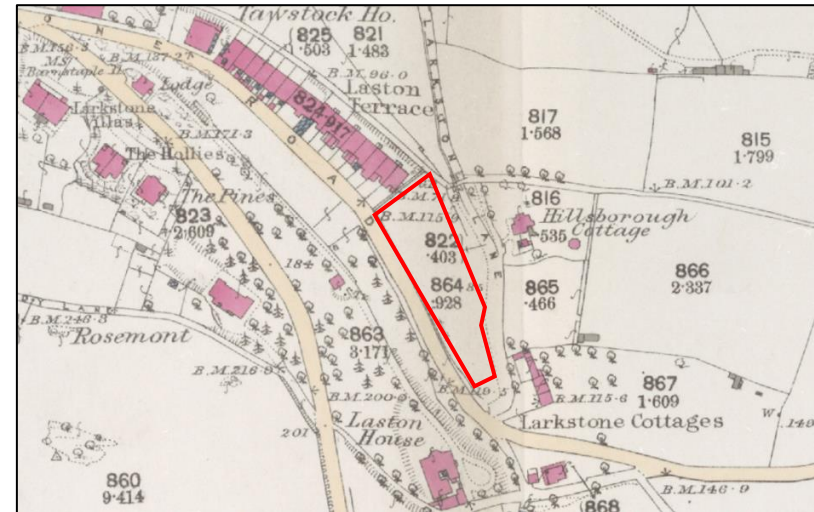


FIGURE 4: EXTRACT FROM THE 1888 ORDNANCE SURVEY FIRST EDITION 25-INCH MAP (REPRODUCED WITH PERMISSION OF THE NATIONAL LIBRARY OF SCOTLAND). THE APPROXIMATE SITE LOCATION IS INDICATED.

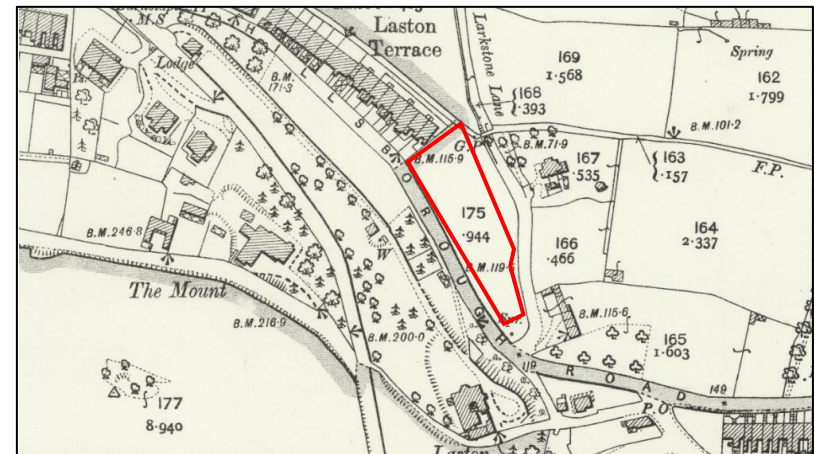


FIGURE 5: EXTRACT FROM THE 1903 ORDNANCE SURVEY SECOND EDITION 25-INCH MAP (REPRODUCED WITH PERMISSION OF THE NATIONAL LIBRARY OF SCOTLAND). THE APPROXIMATE SITE LOCATION IS INDICATED.

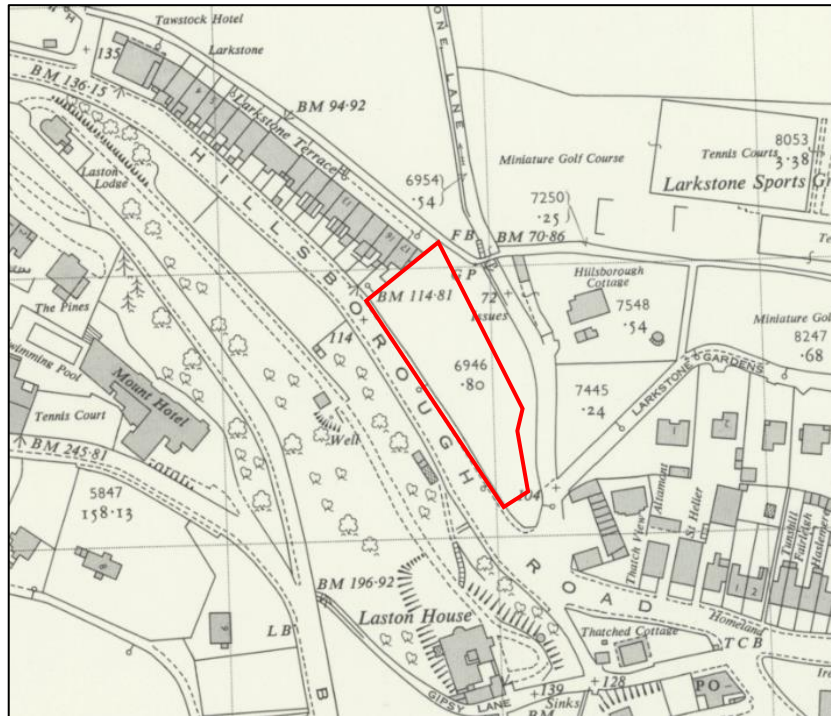


FIGURE 6: REVISED SECOND EDITION ORDNANCE SURVEY MAP PUBLISHED 1960. THE APPROXIMATE SITE IS INDICATED (REPRODUCED WITH PERMISSION OF THE NATIONAL LIBRARY OF SCOTLAND).

4.2 DOCUMENTARY HISTORY

The site is located in the parish of Ilfracombe in the hundred of Braunton and deanery of Shirwell. Lysons⁶ notes that Ilfracombe was historically a significant sea port. The pier was constructed in 1761 by Sir Bouchier Wrey. The manor of Ilfracombe was held by Baldwin the Sherrif at Domesday; the Lord of the manor in 1066 was Almer. Lysons records that the manor passed through the Martin family to the Audleys and then to the Bouchiers⁷. The Bouchier Wrey family occasionally resided at The Manor House, now The Admirals House, c.400m to the north west of the proposal site.

Historic photographs of the proposal site from the early 20th century (Figures 7 and 8) show it as a green open space, with an avenue of trees along the pavement along Hillsborough Road and a standard tree at the junction with Larkstone Lane. A fence line appears to separate the site from the pavement along Hillsborough Road. A Historic England image flown in 2016 (not illustrated) shows the site in use as a community or allotment garden at this date⁸. Oral history evidence provided by the website of an adjacent hotel indicates that at one point in approximately the mid 20th century, every house on Larkstone Terrace was a hotel and this area of Ilfracombe was particularly busy with holiday makers⁹. Aside from the use as gardens in the early 21st century, this study has not found any evidence for other use of the site. Ilfracombe Museum may hold further historical imagery or documents relating to the site. Historic England also hold a collection of historic imagery of Ilfracombe from 1890-1910, taken by an unknown photographer which may include images of the site¹⁰.

⁶ Lysons, S and Lysons, D. 1822: Magna Britannia Volume 6: Devonshire. London

⁷ Ibid

⁸ https://historicengland.org.uk/images-books/archive/collections/aerial-photos/record/29935_040

⁹ <https://www.collingdalehotel.co.uk/2017/04/24/collingdale-history/>

¹⁰ <https://historicengland.org.uk/images-books/photos/collection/ILF01>



FIGURE 7: PHOTOGRAPH OF LARKSTONE TERRACE SUPPOSEDLY C.1920S, BUT LOOKS EARLIER (FACEBOOK: THE ILFRACOMBE HISTORY FORUM)



FIGURE 8: PHOTOGRAPH OF LARKSTONE TERRACE C.1930S (FACEBOOK: ILFRACOMBE HISTORY GROUP)

4.3 ARCHAEOLOGICAL BACKGROUND

Although substantial change has taken place in the area surrounding the site, the proposal site itself has been subject to little change during the past two centuries. The site falls into an area that is classified in the Devon Historic Landscape Characterisation *Post Medieval*

Enclosures: Enclosures of post-medieval date. Fields laid out in the C18th and C19th commonly have many surveyed dead-straight field boundaries. The site does not appear to have been subject to any archaeological investigation and only limited archaeological fieldwork has occurred within the surrounding area.

A 500m search radius has been assessed for designated heritage assets due to the relatively urban nature of the site (Figure 13 Appendix 1). Undesignated heritage assets have not been considered in detail as part of this initial scoping assessment although a Second World War Emergency reservoir is recorded at the southern edge of the site, visible on historic aerial imagery from this period. There is one Scheduled Monument within 500m of the site, Hillsborough Promontory Fort, one Conservation Area (Ilfracombe) and 28 Listed Buildings (1 Grade I; 1 Grade II*) within 500m of the proposed site. There are no World Heritage Sites, Registered Parks and Gardens or Registered Battlefields within 500m of the site.

4.4 AERIAL PHOTOGRAPHY

A review of readily available aerial photography indicates that the site has seen little change between 2001 and 2022. The photographs show that the site appeared to be maintained as open green space in 2001, becoming more overgrown during the early part of the 21st century. It was in use as allotment or community gardens in 2017 although that use appears to have been relatively short lived, as by 2018 the site appears to have been cleared and more recent photographs (Figure 11) show it as overgrown.



FIGURE 9: AN AERIAL PHOTOGRAPH OF THE SITE FROM 2001 © INFOTERRA LTD & BLUESKY.



FIGURE 10: AN AERIAL PHOTOGRAPH OF THE SITE FROM 2017 © INFOTERRA LTD & BLUESKY.



FIGURE 11: AERIAL PHOTOGRAPH OF THE SITE FROM 2022 © GOOGLE

4.5 LIDAR DATA

LiDAR data is available at a survey interval of 1m for the site and for the surrounding area. Whilst a 25cm interval is preferable for the identification of archaeological features, especially within vegetated areas, a 1m interval can be used for the identification of larger features. The LiDAR data is a 2022 data set. Digital Surface Model (DSM) data was not assessed due to extensive vegetation coverage. Digital Terrain Model (DTM) LiDAR data indicates terracing or building up of material in a north west-south east linear form across the site. There is a rectangular platform visible, likely corresponding with a building relating to the recent use of the site as allotment gardens. It is possible some evidence for the documented WW2 emergency reservoir may remain at the southern extent of the site.

LAND AT LOWER LASTON FIELD, ILFRACOMBE, DEVON: HERITAGE ASSESSMENT

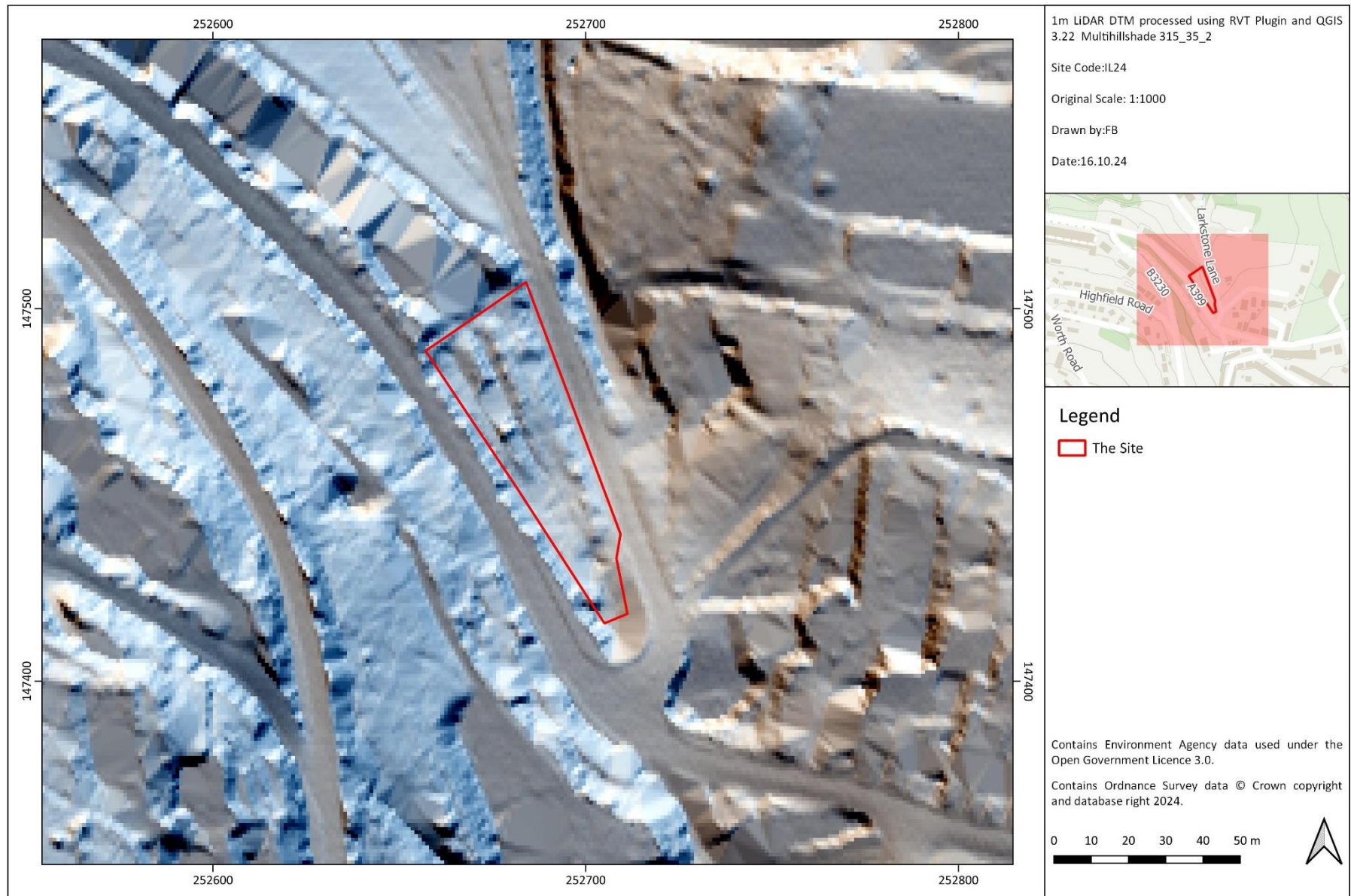


FIGURE 12: LIDAR 1M DTM DATA

4.6 ARCHAEOLOGICAL POTENTIAL AND DIRECT IMPACT SUMMARY

Historic mapping indicates that the field layout of the site has remained constant since the mid-19th century. The historic field-pattern of the site is characterised as *Post Medieval Enclosures*. Major change took place with the construction of Larkstone (previously Laston) Terrace in the second half of the 19th century, followed by subsequent residential development of this area.

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

The results of the desk based assessment would suggest that the archaeological potential for the site is *low*. Terracing or other landscaping appears to have taken place on the site during its recent use as allotment gardens. There is the possibility that evidence of a WW2 emergency reservoir may exist at the southern end of the site.

5 INDIRECT IMPACTS: QUANTIFICATION

5.1 PARAMETERS

A 500m search radius was adopted for this initial scoping report. This is due to the relatively developed nature of its immediate landscape and the effects of topography and screening.

5.2 QUANTIFICATION

There is one Scheduled Monument within 500m of the site, Hillsborough Promontory Fort, one Conservation Area (Ilfracombe) and 28 Listed Buildings (1 Grade I; 1 Grade II*) within 500m of the proposed site. There are no World Heritage Sites, Registered Parks and Gardens or Registered Battlefields within 500m of the site.

The site lies just outside the boundary of the Ilfracombe Conservation Area but is identified as a 'Green Space within a Conservation Area' in the Ilfracombe Conservation Area Appraisal; the site was historically included within the Conservation Area in a revision of the boundary in 1986 but excluded again when the boundary was revised in 2009. Clarification of the status of the site with the NDDC Conservation Officer suggests that the site is considered to form part of the setting of Listed Buildings to the north and south, as well as the setting of the Conservation Area¹¹. The site is not designated as a green space in the North Devon and Torridge Local Plan 2011-2031.

5.3 SCOPING

Due to the early stage of development for the proposal site, no designated heritage assets with the potential to experience an impact from development of this site have been excluded at this stage. Six Listed buildings, one Conservation Area and one Scheduled Monument are considered to be within sufficient distance and/or

¹¹ Pers. Comm via email 25th October 2024.

unlikely to be screened from the development by topography or extant screening that they have the potential to experience some level of impact, dependant partially on the scale, design and form of the development.

The heritage assets proposed for detailed consideration as part of a heritage impact assessment are:

Scheduled Monuments: Hillsborough Promontory Fort

Conservation Area: Ilfracombe Conservation Area. The Ilfracombe Conservation Area is currently on the Heritage at Risk Register.

Listed Buildings: Grade II Listed Hillsborough Cottage; Laston House; Summerhouse approximately 20 metres south east of Hillsborough Cottage; Summerhouse in front garden of Laston House; Well, retaining walls and wellhouse front of Laston House; Olde Thatched Inn including pier and shed.

6 CONCLUSION

The direct (archaeological) impact of any development of this site is considered to be relatively low owing to its topographic location, the apparent agricultural use of the site in the last two centuries and its recent use as allotment gardens.

The indirect impacts of a residential development are likely to vary dependant on the proposed density, scale and appearance of the proposals. The location of the site in a green space immediately adjacent to a Conservation Area as well as the intervisibility between the site and the Scheduled Hillsborough Promontory Fort indicates that any development of this site is likely to have some indirect impact on nearby heritage assets. The lower (eastern) side of the site experiences greater screening from topography and existing vegetation than the higher (western) part of the site. Detailed impact assessment will be required as part of the design process and this should feed into the design development, building on the recommendations of this report.

Although the archaeological potential of the site is likely to be low, the value and significance of nearby heritage assets provide some design constraints around any proposed development of this site.

7 RECOMMENDATIONS AND MITIGATION

It is recommended that any proposals to develop this site for residential use should retain the historic character of the area and the contribution that the site makes to the setting of the nearby heritage assets, most notably the Ilfracombe Conservation Area. These should be appropriately incorporated into any design plans for the site, retaining, in particular, the character and aesthetic.

Any development should be sensitive to the proximity of the designated heritage assets and their settings, noting particularly their location within wider landscape views. This should include the use of appropriate vernacular materials and designs which integrate the development with the surrounding buildings rather than being eye catching or visually prominent. Although not a designated heritage asset itself, Larkstone Terrace is within and contributes to the significance of the Ilfracombe Conservation Area, which is on the Heritage at Risk Register. Proposals should be sensitive to the style of buildings and significance of this area of Ilfracombe, and whilst pastiche is not recommended, proposals should serve to enhance understanding and appreciation of the significance of this part of Ilfracombe as an expanding resort town in the later 19th and early 20th centuries. It is considered a residential terraced form of development may be more appropriate in this location than individual or semi-detached buildings. Proposals must seek to enhance the special character, appearance and significance of the Ilfracombe Conservation Area, and other nearby heritage assets, in line with local and national policy.

Due to the likely low archaeological potential of this site, no archaeological mitigation is considered likely to be of value. Further detailed assessment of impact on each of the designated heritage assets identified above should be carried out as part of the design process.

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APPENDIX 1: HER DATA

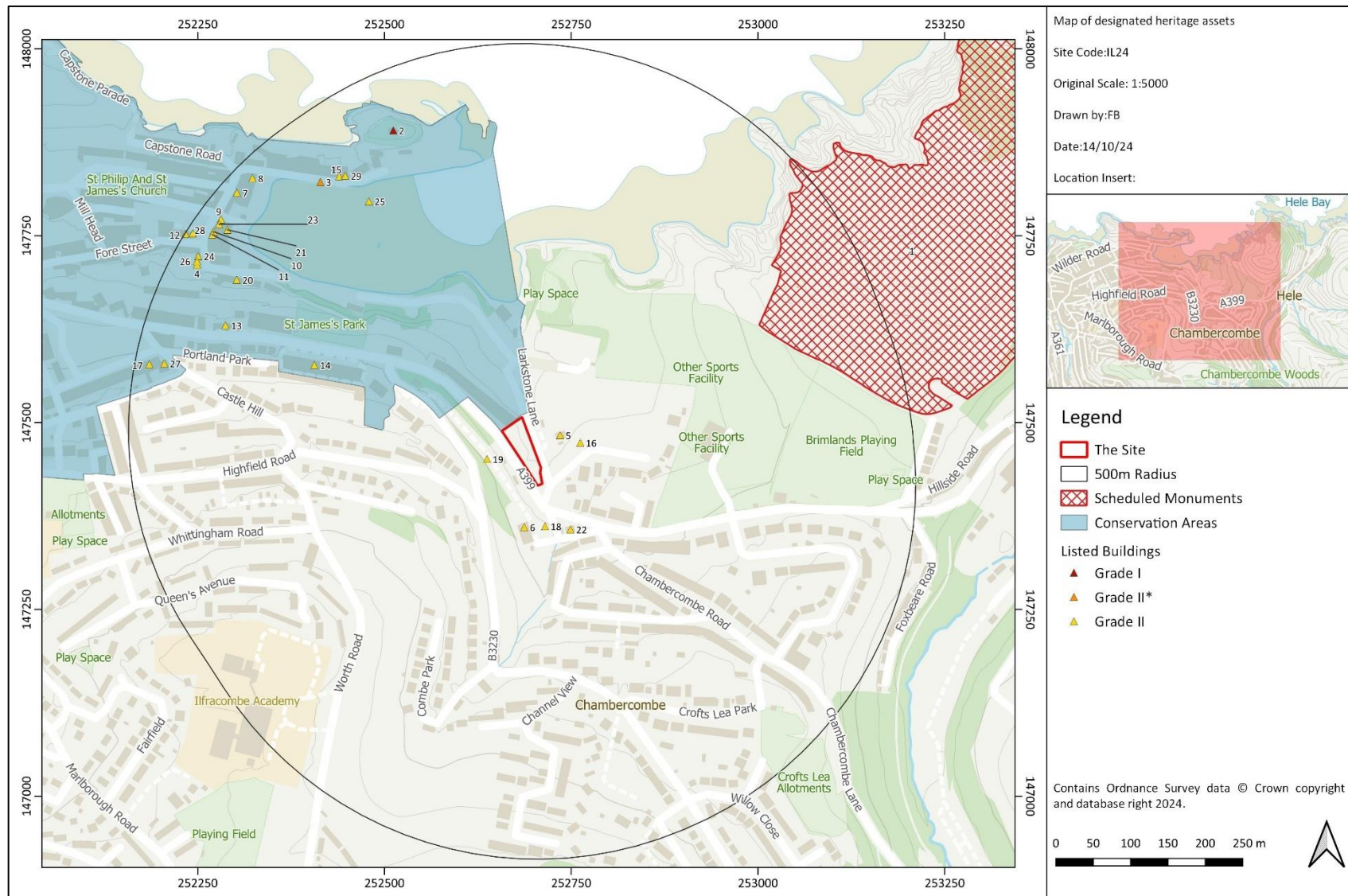


FIGURE 13: MAP SHOWING DESIGNATED HERITAGE ASSETS IN THE VICINITY OF THE SITE

LAND AT LOWER LASTON FIELD, ILFRACOMBE, DEVON: HERITAGE ASSESSMENT

No	List No	Name	Grade
1	1002512	Hillsborough Promontory Fort	SM
2	1208792	St Nicholas' Chapel And Lighthouse	I
3	1203010	The Quay From Royal Britannia Hotel On West To Pier Hotel On East Including Old Quay Head	II*
4	1203006	Mizpah	II
5	1203039	Hillsborough Cottage	II
6	1203043	Laston House	II
7	1203055	3 And 4, Broad Street	II
8	1203056	The Royal Britannia Hotel	II
9	1208121	8, Broad Street	II
10	1208123	11, Broad Street	II
11	1208125	12, Broad Street	II
12	1208334	76 And 77, Fore Street	II
13	1208757	Castle House	II
14	1208768	1-14, Hillsborough Terrace	II
15	1025274	12, The Quay	II
16	1208837	Summerhouse Approximately 20 Metres South East Of Hillsborough Cottage	II
17	1208852	Numbers 1-20 And Attached Railings	II
18	1208859	Summerhouse In Front Garden Of Laston House	II
19	1208866	Well, Retaining Walls And Well House West Of Laston House	II
20	1208934	Manor House	II
21	1208993	Numbers 1 And 2 (Beach House)	II
22	1281872	Olde Thatched Inn Including Pier And Shed	II
23	1281881	Ship And Pilot Inn	II
24	1281894	2, Quayfield Road	II
25	1281897	K6 Telephone Kiosk	II
26	1292889	3, Quayfield Road	II
27	1292928	Montpelier House	II
28	1293196	Number 78 And Attached Railings	II
29	1355043	Harbour Master's Office And Ilfracombe Yacht Club	II

APPENDIX 2: SUMMARY METHOD STATEMENT

TABLE 2: THE HIERARCHY OF VALUE/ IMPORTANCE (DERIVED FROM DMRB LA104 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 e.g. elements of a WHS that convey OUV
High	High importance and rarity, national scale, and limited potential for substitution e.g. Grade I and II* buildings; Scheduled Monuments
Medium	Medium or high importance and rarity, regional scale, limited potential for substitution e.g. Grade II buildings
Low	Low or medium importance and rarity, local scale
Negligible	Very low importance and rarity, local scale.

TABLE 3: SIGNIFICANCE OF EFFECTS MATRIX (DERIVED FROM ICOMOS 2011, 9-10).

		Scale and Severity of Change/Impact				
		No Change	Negligible Change	Minor Change	Moderate Change	Major Change
Value		Significance of Effect (either adverse or beneficial)				
		Very High	Neutral	Slight	Moderate or Large	Large or Very Large
High	Neutral	Slight	Slight or Moderate	Moderate or Large	Large or Very Large	
Medium	Neutral	Neutral or Slight	Slight	Moderate	Moderate or Large	
Low	Neutral	Neutral or Slight	Neutral or Slight	Slight	Slight or Moderate	
Negligible	Neutral	Neutral	Neutral or Slight	Neutral or Slight	Slight	

TABLE 4: PROFESSIONAL JUDGEMENT OF IMPACT (DERIVED FROM DMRB LA104 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.

Magnitude of Impact		Typical Description
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 5.

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 screening.
	<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.

