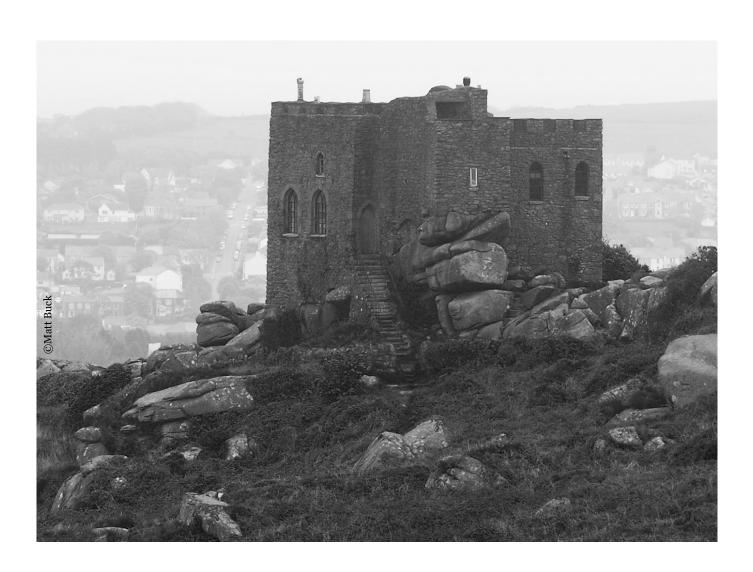




Project Number 7792: Visualising the Impacts on the Setting of Heritage Assets

Julia Bennett Smith, Andrew Croft: Chris Blandford Associates

Discovery, Innovation and Science in the Historic Environment



Visualising the impact on the setting of heritage assets

Julia Bennett Smith, Andrew Croft - Chris Blandford Associates

© Historic England

ISSN 2059-4453 (Online)

The Research Report Series incorporates reports commissioned by Heritage Protection Commissions and by expert teams within Historic England.

The Research Report Series is not usually subject to external refereeing, and their conclusions may sometimes have to be modified in the light of information not available at the time of the investigation. Readers must consult the author before citing these reports in any publication. Opinions expressed in Research Reports are those of the author(s) and are not necessarily those of Historic England.

For more information write to <u>Res.reports@HistoricEngland.org.uk</u> or mail: Historic England, Fort Cumberland, Fort Cumberland Road, Eastney, Portsmouth, PO4 9LD

SUMMARY

The setting of heritage assets has become a more prominent part of development management planning in recent years. This project has been developed to establish recommendations relating to the following two strands of questioning:

- 1. how impacts on the setting of heritage assets can be identified and expressed within application documents; and
- 2. how visualisations can be better used to assess and express likely change that a development would bring.

Several strands of research were undertaken using desk-based reviews of planning applications, stand-alone setting studies and evaluating methodologies to assess the significance of heritage assets and their settings. In addition, an industry workshop was undertaken alongside a technology review to inform further on the current challenges and opportunities for improvement regarding assessing and expressing changes to the setting of heritage assets arising from development. As a result this report has identified a number of findings.

The project identified that a significant number of planning applications were not supported by any heritage assessment, and where documentation was provided it often lacked a focus on the key issues. This suggests insufficient analysis and lack of robust assessment on potential impacts on heritage assets as a result of changes to their setting. Visualisations which were provided with planning applications were generally specified for LVIA / TVIA purposes and not to aid heritage assessment. The scope of local planning authorities and stakeholder consultees providing guidance on the focus of heritage assessment is also unclear. This has led to a weakened decision-making process in the planning system where the settings of heritage assets require consideration.

The report has identified four recommendations including the production of a visualisation Advisory Note and training on its use, techniques and technology available. In addition, further guidance on Step 2 of the stepped assessment process in the Good Practice Advice for Planning Note 3 produced by Historic England is suggested. Finally, the production of stand-alone Setting Studies for highly significant assessment whose assets are under particular development pressure is also recommended.

CONTRIBUTORS

Julia Bennett Smith – Chris Blandford Associates Andrew Croft – Chris Blandford Associates Mike Spence – MS Environmental

ACKNOWLEDGEMENTS

Andy Brown – Historic England Neil Redfern – Historic England

DATE OF RESEARCH 08/08/2019

CONTACT DETAILS

Andrew Croft, Julia Bennett Smith – Chris Blandford Associates <u>Acroft@cbastudios.com</u> <u>jbennettsmith@cbastudios.com</u>

CONTENTS

Introduction	1
Background and purpose of project	
Methodology	
Scope of Study	2
Review of Planning Application and Appeal Documentation – the 'long list'	2
Review of Planning Applications – the 'short list' case studies	3
Industry Workshop	3
Review of Setting Studies	5
Review of Visualisation techniques	
Historic England Diagrammatic Mapping Technique	6
Introduction	6
Overview	
Conclusions	
Summary of Findings	8
Introduction	
Procedural issues	
Information provision	8
Relevance of material	
Enhanced scrutiny at Inquiry	9
Revised / resubmitted applications	10
Technical Issues	10
Analysis of setting and its contribution to significance	11
Authorship of assessments	
Selection of viewpoints	13
Use of visualisation techniques	13
Key conclusions	
Recommendations	
Appendix A – Review of Application and Appeal Documentation	
Appendix B – Detailed case studies	19
Summary of Case Studies:	
Detailed Proforma	24
Appendix C - Industry Workshop	103
Perceived Issues:	
Proposed Improvements:	103
Potential Actions:	
Appendix D - Review of Setting Studies	105
National Trust Pilot Setting Studies	
Angel of the North Significance and Setting Study	109
Appendix E - Historic England's Diagrammatic Mapping Technique	
Appendix F – Review Of Visualisation Techniques	
Introduction to Visualisation Techniques	
Technology Review	
Appendix G – Policy Guidance And Legislation	

INTRODUCTION

Background and purpose of project

The setting of heritage assets has become a more prominent part of development management planning since the high-profile case of Barnwell Manor¹ reminded decision-makers that, in relation to listed buildings, setting was a matter of law as well as a matter of national planning policy i.e. as set out in the National Planning Policy Framework (NPPF). Consequently, a number of development decisions have pivoted around the issue of setting, with some proposals being refused permission because of unjustified harm to the setting of designated and non-designated heritage assets.

Given the potential to affect outcomes it is therefore important that decision-makers are appropriately informed regarding the potential effect of a development on the setting of designated and non-designated heritage assets. However, decision-makers are often provided with contrasting opinions of what the setting of a heritage asset is, how that setting contributes to the significance of an asset and how a proposal may affect the setting and significance of an asset.

In reviewing this, sometimes conflicting, information, visualisations can be a useful tool. They are used as part of the design process by practitioners to guide the design of a development and analyse its potential impacts. They are also used to present information to decision-makers and to demonstrate the presence, or absence, of impacts. Visualisations can therefore play a significant role in the design of development and in determining applications.

In this context, this project has been developed to establish recommendations relating to the following two strands of questioning:

- how can impacts on the setting of heritage assets be consistently and appropriately identified and expressed within application documentation; and
- if visualisations are needed, how they can better relate to the setting of a heritage asset and better express the likely change that a development would bring.

The project supports the corporate aims of Historic England in improving its own planning advice and enabling better impact assessment at a time when lessons can be learned from past practices. These lessons can then be used to inform new advice to practitioners and decision-makers, benefitting all sides of the development process and professionals involved.

¹ http://www.bailii.org/ew/cases/EWCA/Civ/2014/137.html

METHODOLOGY

Scope of Study

The following areas of activity were undertaken to establish an evidence base for the recommendations:

- Review of Planning Application and Appeal Documentation to identify a short list of possible case studies which have the potential to affect the setting of heritage assets
- Development of 8 Case Studies to review planning application supporting documentation in detail, combined with a site visit and discussion with decision-makers to understand the appropriateness of the supporting information, visualisations and assessment findings and decisions taken
- Industry Workshop to discuss the experience of a range of different parties who have a role in preparing supporting information, visualisations, decision making and legal advice regarding planning applications and effects on the setting of heritage assets
- Review of Setting Studies to ascertain different methods and approaches to how setting studies can be produced
- Review of Diagrammatic Mapping Technique to understand an approach developed by Historic England Advisors and how this can be utilised when assessing changes to the setting of heritage assets
- Review of Visualisation techniques to identify the relative strengths and weaknesses of different techniques

Review of Planning Application and Appeal Documentation – the 'long list'

In order to create a series of Case Studies, a 'long list' of planning applications were reviewed using the Historic England's Heritage Planning Case database², alongside recommendations from Historic England representatives and from professional experience of development schemes. Applications were reviewed for development schemes which:

- considered the setting of heritage assets for potential impacts;
- were from a range of geographical locations;
- involved a range of different types of development i.e. large-scale residential housing development, small scale housing development, tall building proposals, commercial development, infrastructure/power generation; and
- were consented (whether through initial planning application or on appeal) and built out schemes which could be assessed in the field.

Following review of a range of planning applications, a 'short list' of potential case studies was developed.

² https://historicengland.org.uk/advice/hpg/planning-cases/

The outcome of this analysis is reported in Appendix A.

Review of Planning Applications – the 'short list' case studies

Once a short list of 8 potential case studies were identified, the supporting information and documentation (heritage and planning statements, visual impact assessments, figures, plans, visualisations, proof of evidence, supplementary inquiry documentation and plans) and decision making paperwork (consultee responses, committee reports, statement of case, Planning Inspectorate report) was reviewed in terms of:

- How the setting of heritage assets and impacts of proposed development was analysed and reported;
- What visualisations were used to support the application and specifically heritage impact assessment, and the connection of the visualisations to the text-based documents; and
- What decisions and findings were made by decision-making parties (local authorities, Historic England, amenity societies, Planning Inspectorate).

Following a review of the relevant planning documentation and visualisations, a site visit was undertaken where it was considered appropriate. This visit was intended to assess the 'built out' development set out in the planning application. This ascertained an understanding of the relevance, suitability, accuracy and limitations of heritage assessment documentation, the production and use of visualisations and decision-making process.

Following the site visit and review of documentation, the final step was to consider whether a 'diagrammatic mapping technique' exercise (see discussion below) would have assisted in understanding the setting of the heritage assets that were potentially affected and how this related to their significance, judging the impact of development proposals and the suitability of accompanying visualisations for understanding the impacts on the setting of heritage assets.

The outcome of this analysis is reported in Appendix B.

Industry Workshop

An industry workshop regarding Visualising Effects on the Setting of Heritage Assets was held in October 2018. This included a discussion by c. 20 professionals from a range of qualified backgrounds involved in the heritage sector. There were attendees from:

- Legal representatives representing cases that involved the setting of heritage assets;
- Curatorial representatives involved in pre-application discussions and asked to comment on planning applications affecting the setting of heritage assets including Conservation Officers and County Archaeologists, Historic England;

3

- Representatives from professional institutes (Chartered Institute for Archaeologists, Institute of Historic Building Conservation, Association of Local Government Archaeological Officers, Landscape Institute;
- Developers (private and public Sector) developing schemes which may involve altering the setting of heritage assets;
- Visualisation specialists involved in the production of supporting technical figures and visualisations; and
- Consultants routinely preparing supporting documentation for planning applications.

A round table discussion was undertaken which included an introduction to the types of visualisations which typically support planning applications from the simple to the complex (e.g. sketches, wireframes, zones of theoretical visibility, 3D modelling). The methodology was outlined i.e. using the long list to develop a short list of case studies and review these applications in terms of the supporting information and subsequent decision made and the decision-making process itself. Then a series of questions were posed to enable a discussion and get a variety of points of view. The following questions were tabled:

Questions

- In your experience, do you feel that the settings of heritage assets are appropriately analysed and supported by visualisations?
- What do you find useful about visualisations, what do you use them for?
- Are there any particular techniques you find more or less useful and why?
- What's the single biggest re-occuring issue you have with visualisations and their production / use / interpretation / application?
- How often do you find significant contradiction between LVIA and Cultural Heritage assessments? How well do you think 'setting' is understood by practitioners, developers and decision makers?
- Do you find that 'good' visualisations, lead to 'good' decision making?

CHRIS BLANDFORD ASSOCIATES landscape | environment | heritage



Notes were taken at the session and those findings and comments with a broad consensus from attendees were summarised following the workshop and sent to those involved for any further feedback.

The outcome of the workshop is reported in Appendix C.

Review of Setting Studies

In order to understand the differing approaches to analysing and describing setting, its contribution to significance and how this may be affected by development proposals, a review of a number of stand-alone setting studies was undertaken.

This review has enabled lessons on best practice to be learnt and the different ways of describing setting, how and what is analysed and what figures, illustrations or visualisations were used to support the text-based narrative. The setting studies reviewed were undertaken to industry standards at the time of their production.

The outcome of this analysis is reported in Appendix D.

Review of Diagrammatic Mapping Technique

A review of two case studies to identify an approach developed and utilised by Historic England to rapidly understand significance of heritage assets and the contribution of setting to this significance. This technique can then be used to evaluate development proposals and communicate to stakeholders.

The methodology and its uses is reported in Appendix E.

Review of Visualisation techniques

A diverse range of visualisation techniques is available to practitioners. These were identified and their potential use in the analysis of change to the setting of heritage assets was assessed, with the primary aim of helping identify when different forms of visualisation may be of use to practitioners and decision-makers.

The outcome of this review is reported in Appendix F.

HISTORIC ENGLAND DIAGRAMMATIC MAPPING TECHNIQUE

Introduction

As set out above a key element of the study related to understanding how can impacts on the setting of heritage assets be consistently and appropriately identified and expressed within application documentation.

In this context Historic England requested that their Diagrammatic Mapping Technique be reviewed and its potential usefulness (if retrospectively applied) in the identified case studies be considered.

This section provides a brief overview of the approach/tool, two case studies of its use are set out in Appendix E.

Overview

In response to an increasing need to provide guidance on the likely impact of development proposals on the setting and significance of heritage assets, Historic England have developed a rapid approach to the identification of key elements of the setting of an asset and the description of how those elements of setting contribute to significance and enable the appreciation of that significance.

The approach utilises 'mind maps' or 'visual diagrams' as a way to visually describe the significance of an asset, key aspects of its setting and how they contribute (to different degrees) to significance and appreciation of that significance:

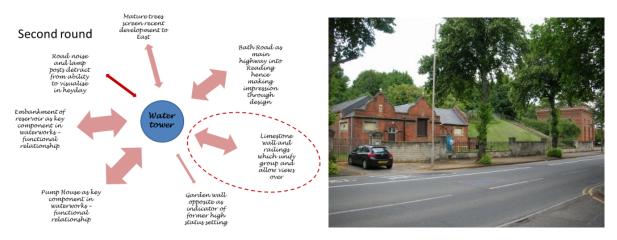


Figure 1: Reading Water Tower – contribution of setting to its significance

The process is led by professional judgement and follows a simple stepped approach: firstly, define the key aspects of significance, then define the key elements of setting (inc. detractors), then set out how that both contributes to significance and enables appreciation of significance — all using simple visual 'mindmaps' with weighted arrows to signify the level of contribution etc (see two case studies in Appendix E for examples)

The approach has a number of positives:

- It is relatively rapid to complete, unlike a full setting study or heritage statement, and therefore can be undertaken by the LPA, HE or the applicant team early in the development process and used as a starting point for agreeing what aspects need to be assessed;
- Its focus on key elements and relationship to significance is also useful in supporting the selection of viewpoints for visualisation (if required);
- Its rounded approach to significance can identify the need for assessments to address non-visual setting related matters where this may be relevant;
- It provides a clear method for organising thinking about setting in an easy to see illustrated manner- it therefore offers a simple "checklist" for heritage professionals in double checking that their assessments and decision-making considers all aspects of setting in a proportionate manner; and
- Its simple visual structure can help communicate key points and issues to a wide audience, both those within the heritage professions and outside.

The approach is, however, based on professional judgement and the lack of detailed reasoning to support conclusions restricts its usefulness in the decision-making process and leaves it open to challenge.

Conclusions

As a tool for developing an initial rounded overview of an asset, its setting and contribution to significance it is very useful in the early stages of an application e.g. at preapplication stage, or at scoping stage for EIAs, as it can be quickly deployed and can provide a basis for common understanding and agreement on key issues.

While the visual aspect of the tool has some advantages, the key strength of the tool lies in the simplicity of its approach to identifying key aspects of setting and how these contribute to significance and the appreciation of that significance. This information could be communicated in different but equally concise ways e.g. bullet points, simple tables etc. The key is to ensure that the information is clearly presented and can provide a basis for agreement between applicants, LPAs (or other decision-makers) and statutory consultees such as HE as to where the focus of assessment should be in relation to individual assets.

SUMMARY OF FINDINGS

Introduction

This section sets out the key findings from the 'long list' review, the 'short list' of case studies, the industry workshop and the review of setting study approaches, with detail presented in the appendices.

In terms of the key findings, two broad themes have been identified. The first relates to general procedural issues within the planning application process itself; the second is more technical in nature and relates to how the understanding (and demonstration of that understanding) of settings, the contribution to significance and the resulting impacts arising from development proposals have been addressed, including the use of visualisations. The two broad areas are discussed below.

Procedural issues

Procedurally the key issues included:

- Absence of, or very limited, information relating to the effect on the setting of heritage assets;
- Unfocused information supporting applications that does not support decisionmaking;
- Decisions being taken to inquiry and subject to enhanced scrutiny, leading to delay and increased costs; and
- Amended applications being resubmitted based on previous assessments and opinions.

These matters are briefly discussed below.

Information provision

Whilst the case studies reviewed spanned a significant period of time, it was still highly noticeable that many planning applications which may have affected the setting of heritage assets did not contain any relevant supporting information addressing this issue. It was also notable that many applications contained insufficient documentation which did not demonstrate a full understanding of the potential effect and/or to demonstrate an understanding of significance and/or setting of heritage assets.

This finding is a similar to that identified in *The Heritage Dimension of Planning Applications report* (2018)³ which found that "less than half the planning applications with a heritage dimension included a statement on heritage", though it is to be noted that this report did not consider applications which may have affected purely the setting of heritage assets.

This lack of information weakens the decision-making process, leading to applications being determined either without appropriate consideration of potential policy issues or

³ https://historicengland.org.uk/content/docs/planning/heritage-dimension-of-planning-applications-pdf/

with decision-makers being faced by a broad range of differing opinions between parties on level of impact and acceptability of proposals.

Although reasons for this situation have not been assessed in detail by this report, or *The Heritage Dimension of Planning Applications report*, they are likely to include matters such as:

- Lack of understanding within the development planning community regarding the potential to affect the setting of assets
- Lack of appropriate levels of consultation at pre-application and application stages with conservation officers, Historic England and other parties e.g. amenity societies
- Limitations of resource in parties advancing development and in local planning authorities determining applications
- Lack of agreed industry-wide tools to quickly identify and establish potential issues in a proportionate manner

With regard to pre-application discussions, particularly with Historic England, a number of case studies demonstrated the value of these to both the applicant and the decision-maker, in terms of helping to shape the design of a scheme, determine the focus of supporting information including visualisations and in ensuring that appropriate schemes were consented without requiring a public inquiry.

Relevance of material

Where information had been presented in the applications it was often general in nature and did not address key heritage issues relating to the scheme and its impact, or provided prodigious information on minor issues. This may reflect the fact that in many cases there was a lack of pre-application discussions, resulting in missed opportunities to agree the key issues that needed to be addressed in the design process and during the assessment of potential impacts.

For example, while viewpoints for landscape/townscape visual impact assessment were often agreed at an early stage, there were limited examples of such viewpoints being agreed in relation to heritage assets, with even fewer examples of agreement on the aspects of an asset's setting that may be affected. Addressing this lack of pre-application may lead to better focussed applications and less difference of opinion on what constitutes the setting of an assets and how any impact on its setting should be assessed.

Enhanced scrutiny at Inquiry

One of the consequences of issues with material and hence decisions at the application stage is the increased risk of the need for an inquiry to address either non-determination or refusal. Although inquiries driven by a focus on harm to the setting of heritage assets are not common, the issue itself does frequently emerge at inquiry.

Inquiries are often presented with entirely new assessments of setting, significance and potential harm which often differ notably from those addressed at the application stage. This often reflects a lack of agreement at the application stage as to what the principal issues relating to setting and assets are and differing views on the setting and significance

of assets and potential harm. While levels of harm are a matter of professional judgement, it is notable just how much variety there is in relation to views on what constitutes the setting of an asset and how it contributes to significance.

Revised/resubmitted applications

It is not uncommon for consented schemes to be re-submitted with revised details e.g. small increases to the height of a development, changes to façade materials, changes to access etc. In some of the cases reviewed it became apparent that the applicant and decision-maker were relying on documentation produced for the previous application to support the similar new proposals as well as often relying on the views of stakeholders (e.g. Historic England) on those previous applications.

This has the potential to lead to incorrect assessments of harm. For example, slight changes in height can lead to development becoming visible in viewpoints, or appearing over buildings/screening, where the original consented development was not visible. A reliance on previously submitted material or on previously agreed visualisations/viewpoints can lead to potential impacts being missed in the design and decision-making process. In this context, even minor changes or alterations to planning applications, should result in the decision-maker and applicant revisiting supporting information to identify if any many material changes may occur and ensuring that these are appropriately addressed as minor changes can affect the level of harm to heritage assets and hence the acceptability of proposals.

Technical Issues

Issues relating to the technical assessment and description of setting and change to setting are closely related to procedural matters and there is a degree of overlap e.g. in relation to the provision of information. A number of significant additional key issues were identified including:

- Analysis of setting and its contribution to significance is often poorly expressed and assessments of harm/benefit are therefore not always related to key policy tests:
- Authorship of assessments led by a range of disciplines giving rise to a diverse interpretation of setting, significance and policy;
- Selection of viewpoints generally not led by heritage matters;
- Use of visualisation techniques to address issues in an appropriate way; and
- Over-reliance on visual matters.

These are briefly discussed below.

Analysis of setting and its contribution to significance

There is no fixed industry-standard approach to the description and analysis of setting and the identification of the contribution that setting makes to significance, although guidance is available in Historic England's 'Historic Environment Good Practice Advice in Planning Note 3 - The Setting of Heritage Assets' (GPA3). As a consequence, a variety of approaches has been taken by practitioners. The nature of the analysis depends on whether it is being undertaken to support development, guide change in the setting of a defined asset or inform decision-making. The approaches fall into a number of broad groups:

- 1. Concise descriptive approaches, often found in heritage statements, generally text based with supporting map and photographic material;
- 2. Short descriptions within Environmental Statements, the depth of analysis often reflecting the volume of affected assets and scale of potential impacts;
- 3. Detailed stand-alone setting studies for major sites; and
- 4. Rapid analyses of assets and their settings to inform decision-making exemplified by the Historic England "Diagrammatic Mapping Technique".

For the most part, the studies undertaken to inform development (Items 1 and 2 above) tended to share similar issues and limitations, these included:

- Often limited description of setting whether the practitioner had considered the
 setting of an asset in detail is often difficult to determine due to limited evidence
 presented in documents. In many cases, particularly in environmental statements,
 descriptions are very limited and not accompanied by visual material. Significant
 levels of assumed knowledge are commonplace. While overly lengthy and detailed
 descriptions of an asset and its setting are not always required, it is difficult in
 many cases to identify whether an appropriate and agreed level of analysis has
 been undertaken.
- Strong focus on visibility, and in particular views from fixed locations often analyses did not explore wider aspects of setting and its contribution to significance such as historical, communal or other relationships/experiences nor did they address visual matters as a dynamic experience. This occurred at all stages of the application process from applicants in their supporting information (LVIA and visualisations) to decision-making to public inquiry.
- Limited analysis of contribution to significance even when a description of setting was provided, the analysis of how this relates to and contributes to a site's significance was often limited. In many cases the assessments focussed on demonstrating that setting made a limited contribution or focussed on elements of setting that would not be affected by the proposed development.
- No clear focus on key issues assessments were often populated with generic or non-specific material that did not focus on the key issues facing the affected assets or development. It was unclear in many cases what the key issues were and how these were addressed by the design and assessment.
- Lack of evidence of agreement with LPA Few assessments presented evidence that key issues and matters had been agreed with the LPA (or other stakeholders).

⁴ https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/

In terms of the stand-alone setting studies, these were generally substantial documents with detailed descriptions and analyses of the setting of assets (see Appendix D). While the level of detail provides a firm basis for decision making it is unrealistic to expect all applications and assets to be treated in such detail, nor is there a need. It is also notable that some studies were not just developed to inform planning-related decision-making but wider land management issues too.

The scale and depth of analysis did sometimes make it difficult to recognise the key issues and factors that contribute to significance with some studies casting a wide net. However, the use of "key themes" or "key elements" in some studies was helpful in providing a sense of the main factors to be addressed in considering an application for change.

The Diagrammatic Mapping Technique addressed differs from others in that it has been developed to provide a rapid, high-level overview of the key aspects of setting and their contribution to significance to inform the decision-making process, particularly in its early stages.

As set out above and as demonstrated in case studies in Appendix E the approach focuses on identifying key elements of setting and weighing how they contribute to significance. It relies on rapid professional judgement but the simplicity of the manner in which the outputs can be communicated aids engagement with other expert and non-expert parties. In many respects the approach provides a framework for less experienced professionals, and a clear checklist for more holistic thinking for all practitioners.

The real strength of the approach lies in the speed of analysis and clarity of presentation. In this respect it potentially offers a method that LPA staff, advisors, applicants and other practitioners can use to build and develop agreement very early in the process as to what the key elements of an asset's setting are and the relative contribution that they make to significance. This can then inform the development of the design, the development of more detailed assessments and the need for, and type of, visualisations and other material.

The analysis of the main case studies, see Appendix E, has clearly identified that the use of such an approach would have improved the efficiency of the application process (e.g. by helping avoid inquires), improved decision-making and improved the quality of submitted applications.

In this context the key aspects of the tool are not necessarily the visual "mind-map" tools, but the focus on identifying key elements and then differentiating and weighting their contribution. This clarity of focus is a useful element of the assessment toolkit at an early stage in the process; but would not ultimately replace the need for more detailed assessments to support applications for change.

Authorship of assessments

In addition to the above, heritage assessments are still regularly produced by other non-heritage-based disciplines e.g. Landscape Architects, Urban Designers and Architects. This leads to a number of issues particularly with regard to the discussion of significance

and the contribution of setting to it — often the discipline background of the author leads to an analysis focussed on their area of knowledge.

There is also an increasing trend, particularly in urban areas, for combined Townscape, Heritage and Visual Impact Assessments. These are dominated by visual concerns and generally prepared by Landscape Architects/Urban Designers. It is not always clear that these are informed by a robust understanding of an asset's significance and the contribution its setting makes to its significance; more often the assessments are led by design and visual considerations.

This combined approach also tends to reinforce the selection of viewpoints that reflect guidance in publications such as the Guideline for Landscape and Visual Impact Assessment (GLVIA) in 2013⁵ produced by IEMA rather than heritage matters (see below).

Selection of viewpoints

The selection of viewpoints for the assessment of impact on landscape, townscape and visual receptors is a long-established process guided, in part, by GLVIA. For the majority of schemes the selection of viewpoints is driven by these disciplines and, as indicated above, the seeming trend of combined Townscape, Heritage and Visual Impact Assessments is reinforcing this.

In many cases the resulting visualisations are of limited value to a heritage assessment as they do not necessarily relate to the significance of assets. The selected viewpoints and visualisation techniques often do not relate to key views from or to an asset, relating more to PROWs and public spaces. It is apparent that the requirement to address potential impacts on the setting and significance of assets is not informing the selection of viewpoints early enough in the design and assessment process. To address this, professionals supporting developers and planning authorities and their advisors would need to develop an early and robust understanding of affected heritage assets and their settings to help ensure that appropriate visualisations are developed to support the assessment of impacts on the settings of identified heritage assets.

Use of visualisation techniques

As set out in Appendix F, there is a host of visualisation techniques available, including the following 12 identified in the appendix to the Landscape Institute Technical Guidance Note⁶ on Visual Representation of Development Proposals:

- Plans, sections, elevations;
- Indicative sketch:
- Annotated photograph;
- Models;
- Computer generated 'wireline' images;
- Augmented reality;

 $^{^5}$ Landscape Institute, IEMA. 'Guidelines for Landscape and Visual Impact Assessment'. 2013 6 https://www.landscapeinstitute.org/wp-content/uploads/2016/01/02-17-Visual-Representation.pdf

- Constructed perspective sketch;
- Photo wire;
- Photomontage;
- 2D exported images from 3D model;
- Verifiable photomontage;
- 2D exported images linked to photomontages of verifiable 3D models

Additionally, there is an emerging and increased use of Virtual Reality (VR) to visualise schemes from different viewpoints.

However, there is often a lack of recognition of how different forms of visualisations can be used at different stages in the development process and how the different approaches can be used to illustrate differing forms of impacts; too often the first visualisations produced are fully rendered verified photomontages. For example, simple verified wireframes or block images can adequately illustrate whether a structure would be visible and its general bulk and mass; fully rendered visualisations may not be needed. Alternatively, an indicative sketch can be used to demonstrate likely scale and relationship early in the design process.

Analysis of the case studies has identified that there is scope for an increased understanding of how the different techniques could be used at different stages in the application/assessment process and to answer different types of questions relating to the proposed development and its impact on setting; in simple terms, it is a question of 'horses for courses'.

Key conclusions

In summary, the key issues identified that require addressing are:

- 1) Significant numbers of applications that would affect the setting, and potentially, the significance, of assets were not supported by any assessment. This can lead to poor decision-making and/or significant delay in the decision-making process;
- 2) Where setting had been identified as an issue and documentation produced, this often lacked focus on key issues, provided limited description of the setting of an asset, provided limited analysis of the contribution of setting to significance and impact assessments tended to focus on justifying a development rather than describing impact on setting and significance. It was often unclear whether sufficient analysis had been undertaken as limited evidence was provided;
- 3) Visualisations to support assessments and inform design were generally specified for LVIA or TVIA purposes and did not necessarily relate to aspects and elements of setting. They were often inappropriately specified, with techniques chosen either providing too much detail or too little to answer the question that the visualisation was intended to address; and
- 4) At all stages it is generally unclear as to the scope of LPA or wider stakeholder involvement in identifying assets that could be affected, identifying the aspects of their setting that could be affected and which contribute to significance and in identifying the need for, location of and type of visualisations this often led to delay and unnecessary conflict between parties.

RECOMMENDATIONS

The following key recommendations have been developed to address the main issues identified by this study.

Recommendation 1: Develop and publicise a visualisation advisory note

It is recommended Historic England prepare either an annex to GPA3 or a new standalone technical note, potentially in the form of a Historic England Advice Note, on the use of visualisations in the assessment of impact on setting. This would identify the range of available techniques and set out their various uses, limitations and when they can be best be deployed within the development and assessment process.

This guidance would be useful to applicants, their consultants and decision-makers.

Recommendation 2: Provide further guidance on Step 2 of GPA3

GPA3 provides outline guidance on how to identify assets whose settings may be affected by development and how to determine the contribution that their setting makes to their significance. It is clear from the study that further guidance is required in this area to ensure that assets are identified and that impacts on their setting and significance, are appropriately identified and addressed in the design and assessment process.

It is therefore recommended that either GPA3 is updated, or a Historic England Advice Note is prepared, to:

- Encourage developers and planning authorities to use the "Diagrammatic Mapping Technique" (see above and Appendix E), or similar narrative/illustrative approaches to provide an initial high-level identification of the key aspects of an asset's setting and how this contributes to its significance;
- Encourage LPAs, statutory consultees and developers to <u>agree</u> which assets may be affected, what the key aspects of their setting are and how those contribute to setting (at a high level), early in the pre-application process, or in a Scoping Report for an Environmental Statement, and prior to detailed design or assessment commencing; and
- Set out minimum and expected standards/descriptive material to support an application in terms of describing an asset's setting and the contribution that the setting makes to significance.

Recommendation 3: Improved training

Better training regarding the analysis of setting and the use of visualisations should be delivered as part of existing training schemes such as Historic Environment Local Management (HELM) Training Programme or Essentials Programme. In addition, HE and LPAs should seek to undertake internal training sessions on the matter, beyond the recorded webinars on the matter. Engagement with CIfA and IHBC should also be undertaken to ensure these issues are addressed by training programmes they offer and to ensure these issues should feature in emerging apprenticeship schemes.

Areas to address would be appropriateness of supporting documentation and visualisations when considering applications involving the setting of heritage assets,

acceptability of proposals, benefits of pre-application discussions, engagement of specialist expertise and public inquiries. If it was possible to roll out the Essentials programme to Councillors involved in the planning decision making process that would also be of great benefit.

Recommendation 4: Setting Studies for key assets

Some assets will be subject to repeated applications that may affect their setting e.g. major urban designed landscapes, assets close to rapidly expanding urban areas, or large-scale designated assets e.g. extensive World Heritage Sites.

In these cases, there would be significant benefit to ensuring that there is an adopted/agreed description of setting and the contribution that this makes to significance. The development of formal stand-alone setting studies would provide an agreed starting point for the assessment of development proposals that may affect their setting and significance. This would reduce potential conflict and disagreement during the application process and enable developers and decision-makers to focus on assessing the scale of change, rather than debating the nature of an asset's setting.

To support this process it is further recommended that Historic England prepare a short Advice Note setting out the key components of such a study.

APPENDIX A – REVIEW OF APPLICATION AND APPEAL DOCUMENTATION

In order to identify 8 suitable detailed case studies, a review of approximately 50 planning applications was undertaken. Potential planning applications were reviewed from the Heritage Planning Case database along with suggestions of potential cases provided by Historic England representatives and from professional experience of development schemes.

The requirement for a suitable detailed case study included the following factors: schemes which:

- considered the setting of heritage assets for potential impacts;
- were from a range of geographical locations;
- were for a range of different types of development i.e. large-scale residential housing development, small-scale housing development, tall building proposals, commercial development, infrastructure/power generation; and
- were consented (whether through initial planning application or on appeal) and built-out schemes which could be assessed in the field.

Following this review of a range of planning applications, a 'short list' of potential case studies was developed. Though this stage was originally anticipated to be purely a process to identify a more detailed 'short list' of case studies, the review of a large number of planning applications all of which had a heritage dimension had an element of 'lessons learnt' in itself.

A reasonable number of applications reviewed that were likely to affect the setting of heritage assets did not have a heritage statement or very limited documentation in terms of narrative-based reporting. In addition, where heritage assessment was undertaken in some form, the documentation often had little or no illustrations or visualisations to support the application.

Supporting documentation was often a paragraph or single page of text, with little information on significance of heritage assets or their settings. Supporting documentation often lacked figures, photographs, ZTVs or other visualisations to illustrate distance, context, setting and therefore effect of development proposals and therefore the robustness of the assessment. By comparison, the majority of these applications had more detailed Design & Access Statements, and Landscape (or Townscape) Visual Impact Assessments with illustrations or figures which could be been used to assist in the heritage assessment. Indeed, had these visualisations been influenced at earlier stages to be made more pertinent to the heritage assessments, there would have been a more understanding of significance, more robust analysis of impacts and more rigour to the planning process and engagement of statutory consultees where relevant.

This finding is also identified in *The Heritage Dimension of Planning Applications* report⁷ which found that "less than half the planning applications with a heritage dimension included a statement on heritage", though it is to be noted that this report did not consider applications which may have affected purely the setting of heritage assets.

The main conclusion drawn from this review indicates that there is often a lack of suitable supporting documentation regarding the impacts on the historic environment to support planning applications. This lack of information weakens the decision-making process for local planning authorities and for statutory consultees. This lack of information and considered understanding of effects led to recommendations to refuse applications, which were subsequently consented on appeal. Conversely some applications were consented when potential for harm to the significance of heritage assets had not been fully understood or communicated to statutory consultees or decision-makers including councillors.

The lack of suitable, considered supporting information both in narrative form, and through visualisations or illustrations to accompany planning applications which consider the setting of heritage assets is a strand of learning that comes up repeatedly throughout this project.

⁷ https://historicengland.org.uk/content/docs/planning/heritage-dimension-of-planning-applications-pdf/

APPENDIX B – DETAILED CASE STUDIES

The case studies reviewed included:

- Allerton Waste Park, Yorkshire
- Bridport Magistrate's Court, Dorset
- Shepham Wind Farm, Polegate, East Sussex
- Monk Bar Garage, York
- Low Marnham Biomass Heat and Power Plant, Nottinghamshire
- Land of Cirencester Road, Fairford, Gloucestershire
- Disused Airfield, Lissett, East Riding of Yorkshire
- X1 Building, Liverpool

The case studies were reviewed in detail, and an analysis of each is presented in a proforma below. A short summary of each is also provided below.

Summary of Case Studies:

Allerton Waste Park, North Yorkshire: This case study addressed a planning application seeking consent for a waste facility located within a quarry near to Allerton Park, a Grade II Registered Park and Garden with associated Listed Buildings including Allerton Castle (Grade I), Chapel (Grade II*), Church of St Martin (Grade II*) and the Temple of Victory (Grade II*).

Consultation on the scheme with English Heritage (now Historic England) and North Yorkshire County Council (NYCC) commenced in 2009. The scheme was then paused with consultation and revision of scheme re-commencing in 2011.

English Heritage (as was) was involved from an early stage in the assessment and understanding of the significance of potentially affected assets, their settings and the impacts the proposal would have. The early involvement in consultation on the project of English Heritage was instrumental in the recognition of the heritage issues and ensuring the significance of the assets was well understood.

Visualisations were key to the design and assessment process. With views of assets being as important as views from them, the viewpoints for these were agreed with English Heritage (as was) and NYCC and was based on heritage considerations, not just LVIA matters. Of particular note was the use of a crane raised to the height of a proposed chimney to help identify that the scheme would not be visible from a number of locations.

The detailed visual assessment work helped to ascertain that potential impacts were not as harmful as originally thought. The scheme was consented and has been built out. The resulting impacts are similar to those predicted by the visualisations and assessment.

Bridport Magistrate's Court, Bridport, Dorset. This case focussed on the change to the setting of a number of designated assets resulting from the demolition of an existing building and construction of a new care home for the elderly.

The application was refused in August 2015 but granted on appeal in January 2016.

The assets which were considered as the focus of the assessment by the developer included a number of nearby Grade II listed buildings. However English Heritage (now Historic England) and the LPA Conservation Officer were primarily concerned about the impacts on Downe Hall (Grade II* and Grade II Registered Park and Garden). Very limited visualisations were provided with the original application but further photomontages and supporting information were provided at appeal. This additional material was instrumental in demonstrating the likely impact of the scheme and its resulting acceptance.

The case study clearly highlighted the importance of agreeing affected assets early in the process, identifying key aspects of the setting and significance and ensuring that appropriate material is presented with that application to demonstrate potential harm e.g. agreed visualisations from agreed viewpoints. Had the material presented at Inquiry been presented as part of the application it is unlikely that heritage matters would have formed part of any appeal.

Shepham Wind Farm, Polegate, East Sussex. This case focussed on an application in 2011 for the installation of five c. 126m wind turbines and associated infrastructure which was withdrawn in July 2012. It was then re-submitted as three turbines with a reduced height of 115m. Planning permission was refused in May 2013 but granted on appeal in July 2015. The heritage assets on which the assessment focussed included a number of Grade II listed buildings as well as Church of St Mary Magdalene (Grade I), Pevensey Castle (Scheduled) and non-designated Glyndley Manor.

A range of visualisations were included in the original application (photographs, photomontages, wirelines). These were agreed with the LPA and other stakeholders but this process did not involve English Heritage (now Historic England). As a result of this the visualisations did not address the effects on the setting of identified assets. The amended application added additional viewpoints but again, these were lacking a focus on effects on the setting of heritage assets.

The Planning Inspector was concerned about the cumulative impacts of recently consented schemes including a nearby offshore windfarm. Once additional information had been submitted, the Inspector gave great emphasis on intervisibility of turbines and the cumulative impacts in relation to other wind farms. The appeal was allowed as the Inspector was satisfied that the changes would not be harmful to the setting of heritage assets or their significance.

As with other case studies, the opportunity was missed at the pre-application stage to clearly identify assets that could be affected and to agree viewpoints that could have been used to test potential impacts. Had this occurred then an appropriate assessment of potential impacts and cumulative impacts could have been undertaken before an inquiry was triggered.

This process could have been further supported by early agreement on the key elements of the setting of the potentially affected assets and the relative contribution of these to their significance. This would have supported a rapid understanding of historical/functional relationships beyond visibility (and critically intervisibility) which the Planning Inspector put great emphasis on.

Monk Bar Garage, York. This small scheme from 2013 for the demolition of two existing buildings alongside York's City Walls and their replacement with two dwellings, garage block and residential flat became a focus of effort by Historic England due to concerns about the potential impact on key heritage assets including York Minster (Grade I Listed), the City Walls (Scheduled Monument) and the York Historic Core Conservation Area (Monkgate Character Area).

Although small in scale the scheme occupied a sensitive location and offered the opportunity to enhance a currently degraded site. A very significant level of preapplication discussion occurred between the architect, Conservation Area Advisory Committee, the City Council and Historic England. This process utilised relatively simple visualisations in the form of hand drawn sketches to effectively describe and assess different options for building mass, form and detailing. These approaches were useful in providing a context for the wider street scene and enabling an appreciation of scale and appearance against the city walls and adjacent buildings.

This pragmatic approach to visualisations worked well, but only due to the preapplication discussions which conveyed a level of understanding of the heritage assets and their settings to the applicant and this influenced the design. The early and continued engagement of key stakeholders has clearly refined the scheme and this influenced the design and therefore is presented well in supporting information and accompanying visualisations.

The case study demonstrates the potential value of early, informed engagement particularly in complex urban environments, as well as the use of differing forms of visualisation to inform different stages in the design and consenting process.

Low Marnham, Newark in Nottinghamshire. This case study considered a planning application for the construction of a combined heat and power plant. The scheme was initially refused by the local authority in 2012 but was later allowed on appeal. Critically, the scheme was preceded by a similar but smaller scheme.

The heritage assets concerned were St Wilfred's Church (Grade I listed) and The Grange (a Grade II listed building). The case study identified a relatively frequent occurrence with repeat applications on the same site in that the decision relied on comments and material on the preceding smaller scheme. The situation was compounded by the fact that the consented scheme involved both the removal of some elements of the original proposals and the addition of new construction elements.

English Heritage (now Historic England) was originally consulted on the previous smaller scheme for the site and provided comments that considered the development to be harmful to the setting of heritage assets, but that that harm was likely to be "less than substantial". They were not consulted again on the new application, which included a

power plant with larger chimneys and more intensive development, and their previous comments on the lesser scale scheme were relied upon as being relevant for that application. This approach may have led to the decision not being informed by appropriate advice.

Additionally, it was clear that the viewpoints for visualisations seemed to have been chosen for landscape and visual impact assessment purposes, rather than to inform an assessment of heritage and setting related matters. This issue was relatively common across many case studies and schemes.

Land South of Cirencester Road, Fairford, Gloucestershire. This study related to an outline planning application for 120 new houses on the edge of a village designated as a conservation area and adjacent to a Grade II listed building. The scheme was initially refused in 2013, but then allowed on appeal in 2014.

The village of Fairford is a Conservation Area, though the site is outside of this but is next to Burdocks, a Grade II listed country house. One of the issues for the initial application was the lack of visualisations produced for the scheme to support and an assessment of impact. This was exacerbated by a lack of supporting information demonstrating an adequate understanding of the significance of Burdocks and how the proposal would affect its setting and significance.

Early identification of potentially affected assets, and agreement on the key aspects of their setting and significance (e.g. through Diagrammatic Mapping Technique) as part of pre-application discussions would have benefited the development and assessment of the scheme and may have helped avoid an inquiry.

Disused Airfield, Lissett, East Riding of Yorkshire. Lisset airfield was originally developed for a twelve-turbine windfarm in 2007. The site was the subject of an application for a further five additional turbines in 2013, but this was refused. The refusal was based in part on the impact on the setting and significance of Burton Agnes Hall and its associated gatehouse, walls, gate piers and grounds.

The original 12 turbine scheme had adversely affected the setting of the hall, gatehouse and grounds. The visualisation and supporting material in 2007 did not strongly relate to heritage issues and professional practice in relation to setting at the time was less developed. The later application was subject to considerable engagement with Historic England and the need to address impacts on the setting of assets, on an individual basis, was clearly communicated to the applicant and decision-maker. This, coupled with supporting information that included visual material form relevant viewpoints, provided a basis for refusal.

X1, Liverpool. As with some other case studies, this is another case of repeated applications on the same site. An application was originally submitted in 2006 for a 23-storey tower, with visualisation locations chosen that were suitable for the scale of development. A number of visualisations were produced to support the development including photomontages, wireframes, 3D models and flythroughs. The supporting material also related to the numerous listed buildings, Conservation Areas and the World Heritage Site within the urban centre of Liverpool. The scheme was granted consent.

A second application was submitted in 2016 for a 25-storey tower to replace the 23-storey scheme. When the application was re-submitted a number of the assessments were updated to support it, including the Heritage Statement and townscape/landscape impact assessment. However, the locations from which visualisations were produced were not updated. This resulted in a small number of locations not being assessed where a 25-storey tower would be seen but not a 23 development. These included potentially sensitive locations relating to the setting of heritage assets e.g. views of the Grade I listed Albert Docks Warehouses.

As with other case studies there was a reliance on previous assessment material and viewpoints when in fact it would have been appropriate to request new information and viewpoints to address the increases in height. The case study clearly highlights the importance of re-considering the scope of assessments and location of viewpoints in light of changes to a scheme even if they are relatively minor changes. In the case of X1, a detailed ZTV may have helped identify potentially newly affected locations.

Detailed Proforma

Note: throughout the following where text refers to English Heritage or EH, this refers to English Heritage before the creation of Historic England. The role and responsibility of EH (as was) has now been assumed by Historic England (HE).

Proposal Name:	Allerton Waste Park
Application /	
Appeal	NY/2011/0328/ENV
Number:	https://onlineplanningregister.northyorks.gov.uk/Register/PlanAppDisp.aspx?recno
	<u>=8124</u>
Proposal	Granted consent by North Yorkshire County Council
Description:	
Heritage Assets	Allerton Castle Park – Grade II Registered Park and Garden and associated listed
Considered:	buildings, including Allerton Castle (Grade I), Chapel (Grade II*), Temple of Victory
	(Grade II*) and the Church of St Martin (Grade II*)
	The applicant's ES chapter noted:
	'whilst Allerton Park's significance is not comparable with the surrounding Grade I listed
	landscapes, such as Studley Royal, it should be noted that it does provide the setting of a
	Grade I listed house and contains some features which are of a very early designed
	landscape (square pond feature on the square island in the Lower Fish Pond and Arbour
	Hill, site of the Temple of Victory) which in themselves indicate its importance'
	EH (Now HE) stated in correspondence that they accepted the applicant's assessment of
	the significance of the assets.
	EH particularly involved in assessment and understanding the significance of assets,
	their settings and the impacts this would have.
Summary of	Planning Statement Figure 03.2 shows an aerial photograph of the site in its existing
Supporting	landscape context
Documentation:	



Planning Statement Figure 03.03 shows existing views of the site in use as a quarry

Planning Statement Figure 3.14 shows perspectives of visitors views of the facility.



The Environmental Statement was supported by figures depicting listed buildings in 3km and 10km buffers from the scheme, Scheduled Monuments, HER date points, historic landscape character areas, Conservation Areas within 3km, RPGs & WHS and Registered Battlefields.

Fig 04.06 shows the ZTV for both building and stack, with viewpoints for heritage assets plotted.



The viewpoint wireframes and montages support the 2011 application.

NB Viewpoint 28 is of particular significance, as it captures the view of most concern to EH.

'After 15 years, the stack associated with the EfW and, to some extent, the body of the proposed EfW would become the dominant skyline feature. There would be changes to the setting of the Temple of Victory, such that it is significantly modified; the impact on this listed building would be moderate. Much of the body of the EfW building would not be visible from this viewpoint and, in addition, the mitigation proposed would in effect restore a further significant element of the 18th and 19th century landscape. The significance of effect is therefore assessed as being Large Adverse.'

Figure 1.3 'Location of Significant Visual Effects from ES Representative Viewpoints' from the 2011 further information shows the location of the 'significant effects' viewpoints

Key Findings about Setting and Acceptability: (supporting documentation. The applicant's heritage assessment, undertaken as a chapter as part of the ES, assessed the impact to the ensemble of assets at Allerton Park using two scenarios, a full landscape mitigation — which included 'restoration of Sand Hill and the restoration of all parts of the adjacent landfill. Planting proposals for Sand Hill include extensive areas of native woodland (consistent with those for the planned landfill restoration) to create initial impact and screening effect, with specimen parkland trees proposed to further create a parkland landscape character sympathetic to the designed landscape at Allerton Park',

local authority, Inspector)

and a partial landscape mitigation programme, which consisted of the restoration of Sand Hill and the restoration of parts of the adjacent quarry.

Paras 3.5.45-47 of the ES state that the impact and effect arising from the full landscaping programme on Allerton Park:

At both year one and year 15, mitigation would provide partial screening of the proposed development. At year one Sand Hill would provide partial screening of the proposed EfW building.

At year 15 a greater part of the body of the proposed EfW building would be obscured by planting but a small part of the body and much of the roof would remain partly visible from this viewpoint. After 15 years the stack associated with the EfW and to some extent the body of the proposed EfW, would become the dominant skyline feature. There would be changes to the setting of the Temple, such that it is significantly modified and the impact on the listed building would be moderate. This viewpoint shows the greatest level of impact on this heritage asset. Other aspects of its setting, such as the view from Lady's Cave would remain unchanged. The significance of effect of the proposed development with regard to this scenario on Allerton Park is assessed as being large adverse, but at the lowest end of this range. Much of Allerton Park would remain unaffected by the development proposal, but, in terms of PPS5, Policy HE9.1, there would be significant but less than substantial harm to the significance of the Temple of Victory.

Paras 3.5.52-3 record the level of harm arising from the scheme if the partial landscaping was put into effect:

'The effect of the proposed development on the listed buildings and registered park and garden is assessed as being large adverse, although it is recognised that the significance of effect would be greater than for the full landfill restoration scenario. Much of Allerton Park would remain unaffected by the development proposal, but, in terms of PPS5, Policy HE9.1, there would be significant but less than substantial harm to the significance of the Temple of Victory, should partial landfill restoration become the scenario before or during development.'

Stakeholder Views on development outcome:

Consultation takes place with EH and NYCC in 2009. There is then a hiatus, and further consultation takes place on the revised scheme in 2011.

The applicant's ES heritage chapter stated the following:

Following a meeting held between AmeyCespa and English Heritage on 4th December,

English Heritage produced a written response on 16th December 2008. This laid out

If not commented, why not (where appropriate)?

English Heritage's position as follows: "A waste management facility on the proposed site at Allerton Park Quarry of the scale outlined in the two bids will have an impact upon the Grade 1 Allerton Castle, the Grade II Registered Park and Garden which forms its setting, and the Park's associated listed structures. The likely impact of the waste management facility upon these and, potentially, other assets in the area needs to be adequately assessed and presented. It would be beneficial to all parties involved if the key views likely to be affected by the waste management facility could be agreed at the outset. To this end, it would be helpful for some form of balloon or crane to be placed on the proposed development site in order to illustrate the height of the proposed facility and, as a result, to identify the areas where its buildings and other structures are likely to be visible.'

This exercise was undertaken in the spring of 2009, and included assessment of views of the crane from a number of locations. EH also requested that the applicant produce visualisations from a number of key locations, these were undertaken and are included in the figures list above.

A letter from EH in the Feb of 2009 stated: 'We would like to reiterate that the crane exercise demonstrated that the development of structures, of the magnitude of those being considered, will impact upon Allerton Castle, the Temple Victory and the associated Registered Landscape of Allerton Park. That said we would also note that the crane exercise indicated that level of impact may not be as great as we originally thought.'

A letter from EH in the June of 2009 to the applicant noted

'As a new and large visual feature within the landscape, the proposed facility will have an adverse impact on the setting of the historic assets and that this will affect the significance and special interest of the historic assets. However, subject to confirmation of the mitigation proposals, it is unlikely that the level of impact will be sufficient to lead to an English Heritage objection on conservation grounds'.

However, writing to the applicant in 2011, EH concluded the following:

We remain generally satisfied that the visual assessments demonstrate that the impacts upon the significance of the heritage assets affected are on the whole within acceptable limits. We do, however, have serious concerns about the impact upon the setting of the Grade II*Temple of Victory and views from it (Photomontage View 28). In our judgement the development has become more prominent in this view than in the earlier

proposals, impacting on the significance of the Temple and its relationship with park and wider landscape. We believe this impact will be substantially adverse and should be considered under PPS 5 Para.9.4 as a harmful impact on the significance of a designated heritage asset which is less than substantial harm. The policies in PPS5 make it clear that in such cases there must be clear public benefits from the development to offset the harmful impacts on significance. We believe the development could deliver the substantial benefits required by PPS5 but at present these are not set out in the Environmental Statement. This is required to enhance the legibility of the designed landscape and thus lessen the impact of the proposed ecopark. These public benefits and how they will be secured as part of the planning permission need to set out clearly in the supporting documentation. For example further information is needed including the details of targeted projects, amount of capital to be invested and methods and timings of delivery of these benefits.

We would expect these works to include the conservation, repair and maintenance of the following listed structures within the park.

- Tunnel
- Bridge between Middle & Lower Fish Ponds
- Boathouse (stabilise and consolidate only)
- Ice House
- Lady's Cave

The conservation and repair works should also include the park boundary walls, with the exception of those stretches which are no longer standing around the Far Park. [and strengthened planting]'

So, in effect, EH were suggesting to offset the level of harm arising to the park with material improvements to assets within the park.

A further letter from EH concerned establishing a mechanism to ensure that the benefits were secured as construction work was ongoing

English Heritage acknowledges the work undertaken to address the heritage issues in relation to the proposed development at Allerton Park Quarry and in particular the landscape and visual assessment and photomontages. This work builds on a crane exercise undertaken by North Yorkshire County Council in 2009. The crane exercise demonstrated that the key areas for concern for English Heritage relate to the views from the south, across and from Allerton Park, Allerton Castle and the Temple of Victory. In addition the baseline evaluation of Allerton Park and Castle by the Landscape Agency (on behalf of North Yorkshire County Council) has established an agreed level of

understanding of the historic assets from which any assessment of the proposals will derive...English Heritage recognises that the key views and relationships lie within the registered park and garden and focus principally on the indivisibility of features within the landscape such as the Temple, Lady's Cave and Rustic Bridge. The proposed facilities, as illustrated, although clearly visible from the registered landscape, the Grade II* listed Temple and Grade I listed Allerton Castle will not intrude directly into key views of them, neither do the proposals interrupt significant designed vistas or eyecatchers. However, by virtue of their scale the facilities will be visible and noticeable as a backdrop to the northward views across the registered landscape. This is most notable with regard to the setting of the Grade II* Temple of Victory and views from it (Photomontage View 28). In our judgement the development will impact on the significance of the Temple and its relationship with park and wider landscape. We believe this impact should be considered under PPS 5 Para.9.4 as a harmful impact on the significance of a designated heritage asset which is less than substantial harm. This harm has been identified in the Environmental Statement, which recommends undertaking conservation works to heritage assets in the registered park in order to mitigate the adverse affects of this proposal. We would endorse this approach as a means of offsetting the harm and better revealing the significance of the heritage assets.'

Site Visit of As

Built Scheme

Summary:

(Date, key

photos, map)

Comparison of

Scheme against

Pre-

As Built

development

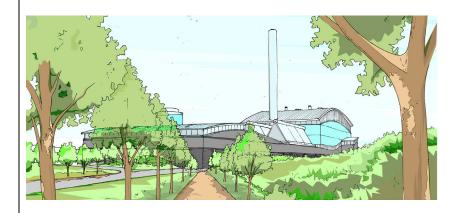
Information:

September 2018.

See below.

Generally accurate, although some colour changes in the chimney from original photomontage images.

Scale and massing accurate against views from the south looking north. Well screened by existing tree belt, which has changed little.





Allerton Park



Temple of Victory

Summary of
Diagrammatic /
Map/
Alternative
approach to
setting:

Significance of assets was well understood but only due to pressure and interest from EH in ascertaining this understanding.

Key Findings:

Visualisations from considered heritage-based viewpoints helped to ascertain that effects were not as harmful as originally intended.

Use of offsetting harm through conservation works.

Help with scheme proposals following a thorough understanding of setting and significance undertaken by English Heritage and developer.

Proposal Name:	Bridport Magistrate's Court, Rax Lane, Bridport, Dorset, DT6 3JL
Application /	WD/D/13/000075 (12/01/2015)
Appeal	APP/F1230/W/15/3133250
Number:	
	https://planning.dorset.gov.uk/online-
	applications/applicationDetails.do?keyVal=DCAPR 125305&activeTab=summary
Proposal	Demolition of existing building and construction of new building to provide 26 no. 1 &
Description:	2 bedroom sheltered retirement apartments for the elderly, communal facilities
	including owner's lounge, guest suite and buggy store.
	including owner o rounge, guest batte and buggy store.
	Granted consent by The Planning Inspectorate on appeal, having been refused
	permission dated 11/08/2015).
	Appeal Decision: 12/01/2016
Translation Asset	Daily and Companyation Area (which is autom) and it is a least to the companyation of
Heritage Assets	Bridport Conservation Area (which is extensive and includes sub-areas outside the
Considered:	town centre).
	Grade II* Listed Down Hall & Registered Park and Garden, Grade II Listed The Grove,
	Mountfield (not listed), Rax House and the Coach House & other Grade II Listed
	properties in the locality.
	The applicant's Heritage Statement noted:
	"The Site has a Grade II listed wall serving as a boundary which will not be physically
	impacted. Several designated heritage assets including listed buildings, Registered
	Park and Garden are located in the near vicinity of the site".
	Turk and danaen are tocated in the near vicinity of the site.
	"The significance of the Grade II listed Registered Park and Garden lies in its role as the
	landscaped grounds of Downe Hall. It is heavily wooded on the southern extremities
	abutting both the Site and Mountfield adjacent and along its boundary edges up
	Coneygar Hill which creates a strong defined edge to the park and garden area. Its
	setting comprises its immediate, intermediate setting of within the park itself, with the
	east and western edges being defined by mature trees and vegetation cover, and wider
	setting with views over Bridport to the English Channel beyond on the southern flank.
	Views are afforded of the town, but the relatively steep gradient mean those properties
	at the foot of the hill around Mountfield including the Site are not visible, further
	reinforced by the extensive tree cover. The Site does not form part of the Registered
	Park and Gardens setting. The Site is considered to have a negligible impact upon the

	setting and significance of this heritage asset on account of the level of intervening tree
	cover and open space (within the grounds of Mountfield) which provides a robust
	buffer to the Park and Garden."
Summary of	Original Application
Supporting	
Documentation:	A Heritage Statement (forming part of original application) included some basic
	viewpoint photographs looking out from the site – one of The Magistrate's Court
	viewed from Mountfield access lane, a view north-east from the site, the site viewed
	from North Street, the adjacent car park viewed south from the site, view west towards
	surrounding hills, view of site from Rax Lane/North Street junction and view of site
	from south-east on access drive.
	ironi souni-cast on access urive.
	Heritage Statement
	Heritage Statement
	Figure 14 (Page 56) of the Heritage Statement showed a map of the Heritage Assets
	around the Site (including the boundary of the Bridport Conservation Area) and this
	was accompanied by some photographs of the Heritage Assets.
	There were no view maint photographs taken from the surrounding Heritage Assets
	There were no viewpoint photographs taken from the surrounding Heritage Assets
	included in the Heritage Statement, nor ZTV, etc.
	A Cita Plan was included showing supposed the heidings and the listed potaining wall to
	A Site Plan was included showing surrounding buildings and the listed retaining wall to be maintained.
	be maintained.
	North Could Fort and March Flooring the managed development within the
	North, South, East and West Elevations showing the proposed development within the
	site were included in the application.
	Appeal Application
	Appeal Application
	The Appellant Statement & Appendices included a Design Statement. It incorporated
	Street Elevations from Rax Lane, car park and North Street, 3D model views from
	North Street, Rax Lane and Mountfield Drive, together with further photographs of the
	site.
	The additional visualisations did not include any views from the Heritage Assets.
77 TO 11	
Key Findings	The Heritage Statement identified the following in relation to the Grade II* Listed
about Setting	Downe Hall: "The significance of the Grade II listed Registered Park and Garden lies in
and	its role as the landscaped grounds of Downe Hall. It is heavily wooded on the southern

Acceptability: (supporting documentation, local authority, Inspector) extremities abutting both the Site and Mountfield adjacent and along its boundary edges up Coneygar Hill which creates a strong defined edge to the park and garden area. Its setting comprises its immediate, intermediate setting of within the park itself, with the east and western edges being defined by mature trees and vegetation cover, and wider setting with views over Bridport to the English Channel beyond on the southern flank. Views are afforded of the town, but the relatively steep gradient mean those properties at the foot of the hill around Mountfield including the Site are not visible, further reinforced by the extensive tree cover. The Site does not form part of the Registered Park and Gardens setting. The Site is considered to have a negligible impact upon the setting and significance of this heritage asset on account of the level of intervening tree cover and open space (within the grounds of Mountfield) which provides a robust buffer to the Park and Garden."

The **Heritage Statement** identified the following re: Mountfield (non-designated)

"The significance of Mountfield lies primarily in its architectural and historic interest at a local level, as commensurate with its lack of a statutory designation. The buildings proximity with the Registered Park and Garden adjacent reinforces the relative isolation of the house and emphasises its prominence. It shares an association with both the Park and Garden and Downe Hall itself on account of William Downes who had both dwellings and the grounds constructed. The contribution of the asset's setting to its significance is an important consideration as its landscaped grounds go some way to defining its importance within the town confines."

The impact on the Bridport Conservation Area is identified as follows:

"The demolition of the existing building on Site would have a positive impact on the significance of the Bridport Conservation Area. The magistrate's court is largely at odds with all the surrounding properties in scale, design and massing resulting in a utilitarian look contrasting with the historic design of the key buildings within the Conservation Area.

The relative openness of the Conservation Area in the near vicinity suggests that any building larger than that presently seen might impact upon the Conservation Built Heritage Statement Area, however the relative openness of this part of the town is tempered by the high levels of mature tree planting which provide screening and soften the Site and which visually creates some physical height to this area (including that contained around Mountfield and the Downe Hall Registered Park and Garden, the latter forming a key part of the Conservation Area in this part of the town). Allied to the

steep topography rising to the north to the summit of Coneygar Hill this forms a strong visual distraction. That said, it will be visible in the immediate, intermediate and intermediate setting, where presently the existing scale and massing is fairly muted. From further afield views will be reduced of nearby important buildings such as Mountfield but that the proposed development itself, whilst noticeable (where presently there is very little views of the amongst the rooftops of built development to the west of the Coneygar Hill summit will form part of this varied mass of built development and roofline contributing to the visual interest of the area from further afield.

Most identified Important Views in the Conservation Area Appraisal around the Site will not be impacted upon by the proposed development, notably broader views from Coneygar Hill and internally around the Mountfield curtilage or Rax Lane and North Street. That said, the proposed development will form a peripheral part of an Important View from the North Street/Rax Lane Junction north-east towards Mountfield over the car park. It is suggested however that this view is valued firstly because of the openness that the car park affords towards Mountfield but also its backdrop of the steeply rising and tree covered Coneygar Hill. The presence of the Site on the periphery of this does not lessen the impact of this hill or the landscaped openness of the lower slopes and will not reduce the level of physical height afforded by the mature tree planting scaling the slopes of the hill."

The Heritage Statement concluded that

"...the proposed development will have a negligible impact upon the setting of the majority of the 21 heritage assets considered as part of the application. This includes 14 Grade II listed properties including the Baptist Church, British Legion Hall, Rax House and The Grove. It includes the Downe Hall Registered Park and Garden and the Bridport Conservation Area. Several non-designated heritage assets were considered of which the Garden House and Mountfield were considered to experience moderate harm and negligible impact and negligible-minor degree of harm to their significance, respectively. Several heritage assets were discounted from assessment on account of limited intervisibility or functional association this includes the Grade II* Downe Hall.

...Where any harm has been identified, this is minor, which thus needs to be considered against the public benefit of the proposals."

Kim Sankey, Conservation Officer (26/11/2014) stated that:

"This proposal relates to a four storey building in a very conspicuous location seen in distant views from Conegar Hill to the north (refer to appraisal for viewshed). In addition to the splendid views from Conegar Hill there is a good view from the west from Allington Hill and Colmers Hill in Symondsbury parish. The majority of buildings in this area are at most three storey and those which are of this scale are key buildings including The Grove, Mountfield and Downe Hall.

There is no reference whatsoever to the significance of Downe Hall its pleasure gardens and walled gardens or Mountfield standing on its elevated position in an impressive landscape has the foremost position and status and is given further prestige *by Rax House acting as sentinel at the gate' at the end of the long sinuous entrance* drive all of which fall within the Sub Area 5: Conegar Hill Area of Bridport. As the proposed development will affect the significance of the following heritage assets; Downe Hall, Garden wall along North Street, The Grove, British Legion Hall, Former Presbytery 36, 54 - 60 Victoria Grove, Baptist Chapel, 15, 19 & 31 Rax Lane together with important local buildings and groups including The Garden House, Coach House Cottage, Coneygar House and 48,50 & 52 Victoria Grove, clear and convincing justification is required to support the application as set out in NPPF paras 128 and 132. A Statement of Heritage Significance is essential to assess the impact of the proposed development within the setting of these heritage assets. The close proximity to Mountfield (which is a designated heritage asset) should be the starting point for design cues in respect of palette of materials and the local vernacular tradition when considering the integration of new buildings in historic settings.

In respect of NPPF Section 7 Requiring Good Design Para 56 states that 'Good design' is a key aspect of sustainable development, is indivisible from good planning and should contribute positively to making places better for people.' Paras 60 & 61 continue to underpin this theme — 'it is proper to seek to promote or reinforce local distinctiveness', and 'securing high quality design and inclusive design goes beyond aesthetic considerations'.

Paras 63 & 64 underpin this approach in determining applications, great weight should be given to outstanding or innovative designs which help to raise the standard of design more generally in the area. Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.'

The **Delegated Report** highlighted the following:

"The Design & Conservation Officer has raised serious concerns and states the following;... The submitted Heritage Statement also provides a more thorough historic analysis of the site and its history. However, despite identification of key features and assets in the immediate vicinity of the site, the evidence base has clearly not informed the proposed development which totally compromises the setting of heritage assets and fails to deliver a built form which respects, reflects or reinforces surrounding architecture, distinctiveness, character or proportion. Previous feedback included concerns over scale, mass and bulk. The new proposals remove the more staggered form of the building, making it a monolithic mass of regular height spanning almost the whole length and breadth of the site. Objections were raised over the 4 storey height of the building, which would make it tower over neighbouring heritage assets, appear over bearing and over-dominant within the site (reinforced by the elevated ground levels). The height has not been decreased and instead of the overall massing being reduced, the number of units within the development has increased. The size of the development site is not substantial and it is surrounded on all sides by listed or locally significant structures. The plot originally formed the kitchen gardens of Mountfield and features a high boundary wall to the north, which is a marvellous feature of the site. Section 137 of the NPPF stipulates that new development should where possible better reveal the significance of heritage assets and certainly preserve those elements of the setting that makes a positive contribution. The proposed development fails to do either and in fact achieves the opposite. The setting of all assets MUST be preserved if any future development is to be supported. This will mean radically reducing the height and footprint of any new building and also respecting the form and proportions of surrounding buildings (i.e. Mountfield and the northern listed wall should remain dominant, visible features and not be dwarfed/impinged by any development). The site provides limited external space for elderly residents when a feature could be made of the former walled garden. Any development should respect the origins of the site, having formed the original curtilage of grade II* listed Downe Hall along with Mountfield, Rax House and the Coach House.

The building fails to work with the topography of the land, when staggering the height would help mitigate appearance of mass and bulk. Extensive areas of flat roof should be omitted and junctions between different roof heights and forms should be carefully detailed. Overall the plans lack detail in terms of juncture treatments and there remain limited contextual drawings which is fundamental considering the close proximity of Mountfield, The Garden House and listed boundary walls. In terms of design the architecture shows lack of refinement and a heavy hand with the building appearing almost institutional. The front foyer/entrance appears out of keeping in the context of the remaining building and appears to provide a highly limited 'communal' area which

I would have thought would be a fundamental element for elderly residents' use. The rows of dormers (not a feature of this part of Bridport), massing of roof, built form and application of materials do not, overall, purvey a sense of quality, proportion and detail that is expected in such a sensitive and prominent site such as this.

With the limited time available to comment on this application, this is a summary of my concerns which have been illustrated and reinforced by English Heritage and Kim Sankey. Whilst English Heritage may not be a statutory consultee, they made emphatic comments to the pre-application submission and I believe they would reiterate those comments in response to this application. An informal response from them at this stage may be worth seeking. It was recommended that the applicant re-consult us on a further pre-application submission before making a formal application. Whilst this certainly wasn't obligatory, this would have enabled the current views to have been reinforced again and hopefully enabled a more successful scheme being put forward. I fail to see how our previous comments could have been taken on board in arriving to this scheme. There remain so many issues requiring resolution that the application is recommended for refusal. It is felt strongly that the proposals, for the above reasons, would create substantial harm on the heritage assets within and around the site including the character and appearance of the conservation area and setting of listed/significant buildings. This conflicts with Chapter 12 sections 132, 133 and 137 of the NPPF, along with Chapter 7 of the NPPF, Sections 66 and 72 od the Planning (Conservation Areas and Listed Buildings Act) 1990 and ENV 4 Local Plan policies'.

The NPPF in paragraph 58 states; 'developments should respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation'. It is recognised that large buildings are a feature of this part of the historic area. The Appraisal states; 'The Sub-Area's character is derived from the varied expressions of status and care should be taken to ensure that such status is not diminished needless'. As stated by the Design and Conservation Officer, the proposal is considered to fail to respect the neighbouring buildings and spaces. The size of the building would undermine this historical hierarchy of status and as such would have an intrusive and harmful impact on the setting and significance of the heritage assets of Downe Hall, registered park and garden and Mountfield.

Refusal of Planning Permission (Comments relating to Heritage Assets)

"The proposed building, by reason of its height, design and resultant massing is considered to result in a detrimental form of development harming the character and appearance of the Conservation Area and setting of the listed buildings and structures.

The large building has insufficient regard to the style and quality of the surrounding heritage assets and adversely affects the visual amenities of the town scape."

Appeal

Kate Williams, Conservation Officer (29/04/2015):

"The submitted Heritage Statement also provides a more thorough historic analysis of the site and it's history. However, despite identification of key features and assets in the immediate vicinity of the site, the evidence base has clearly not informed the proposed development which totally compromises the setting of heritage assets and fails to deliver a built form which respects, reflects or reinforces surrounding architecture, distinctiveness, character or proportion.

Previous feedback included concerns over scale, mass and bulk. The new proposals remove the more staggered form of the building, making it a monolithic mass of regular height spanning almost the whole length and breadth of the site. Objections were raised over the 4 storey height of the building, which would make it tower over neighbouring heritage assets, appear over bearing and over-dominant within the site (reinforced by the elevated ground levels). The height has not been decreased and instead of the overall massing being reduced, the number of units within the development has increased.

The size of the development site is not substantial and it is surrounded on all sides by listed or locally significant structures. The plot originally formed the kitchen gardens of Mountfield and features a high boundary wall to the north, which is a marvellous feature of the site.

Section 137 of the NPPF stipulates that new development should where possible better reveal the significance of heritage assets and certainly preserve those elements of the setting that makes a positive contribution. The proposed development fails to do either and in fact achieves the opposite. The setting of all assets MUST be preserved if any future development is to be supported. This will mean radically reducing the height and footprint of any new building and also respecting the form and proportions of surrounding buildings (i.e. Mountfield and the northern listed wall should remain dominant, visible features and not be dwarfed/impinged by any development). The site provides limited external space for elderly residents when a feature could be made of the former walled garden. Any development should respect the origins of the site,

having formed the original curtilage of grade ll* listed Downe Hall along with Mounfield, Rax House and the Coach House.

Comments by Robert Mellor, Planning Inspectorate (21/03/2016)

"My overall conclusions on this issue are that:

- The demolition of the magistrates' court would enhance the character and appearance of the conservation area and the setting of heritage assets
- There would be minor-negative (less than substantial) harm to the setting and significance of both Mountfield (an undesignated heritage asset) and The Grove (a Grade II listed building)
- There would be negligible effects on the heritage significance of any other listed buildings or undesignated heritage buildings
- There would be a slight loss of visual amenity due to the removal of Trees T1 and T12 which may be partially but not wholly mitigated by new planting
- Whilst it would be larger than a single dwelling of the type first developed in the Coneygar Hill sub area, the appeal proposal would generally respect the dominant character of the sub-area as one of large buildings of residential use or character surrounded by open space. By its large scale, enhanced by its location on higher ground than the car park and North Street, the proposal would result in a change to the appearance of this part of the conservation area which some persons may perceive as harmful. Whilst some limited harm to some heritage assets has accordingly been identified this is less than substantial and would need to be weighed with any public benefits of the proposal in accordance with Policy ENV4."

Stakeholder Views on development outcome:

Original Application

Bridport Town Council:

If not commented, why not (where appropriate)?

"The Town Council's Plans Committee had an interest in this application, as it owns the access road to the site. It was therefore unable to make a recommendation on the application. However, it received representations at the meeting from three local residents and had been sent copies of letters from the speakers and one other person (which had been sent to the District Council), raising issues with the application. In particular the representations raised concerns regarding the height of the development and the Committee asked if that could be looked at it, to confirm the levels and also whether they could be reduced. The Committee also asked if Environmental Health could comment on the reported noise from the heating system. Bearing in mind that the

Town Council was unable to make a recommendation, it was asked if the application could be considered by the Development Control Committee, to include a site visit."

English Heritage (06/06/2014):

"The proposed development, due to its location, scale and appearance, could potentially have an intrusive and harmful impact on the setting and significance of several statutorily designated heritage assets in the surrounding area, including:

Bridport Conservation Area . Downe Hall - Registered Park and Garden; Southern Wall of Mountfield Kitchen Garden - Grade ll Listed; Mountfield House - Undesignated Local Heritage Asset

The potential impact on the significance of those heritage assets should be thoroughly assessed and used to inform the development proposal, as required in the National Planning Policy Framework (NPPF, Para 128). At present the information provided in the 'Pre-Planning Report' does not adequately assess the significance of the heritage assets mentioned above and does not consider the impact of the development of the setting of these assets. We would recommend that this assessment is carried out by a heritage professional using appropriate guidance such as English Heritage 'The Setting of Heritage Assets' (2011).

At present the scheme proposed would potentially have a negative impact on the Bridport Conservation Area due to the density of the development within the plot size. The Coneygar Hill Sub area of the conservation area is characterised by a transition of density from the larger property of Downe House on Coneygar Hill towards the more densely developed urban centre towards East Street. While it must be acknowledged that some C20 development has impacted on this historical layout, the biggest impact is confined to the north of the site in the Broad View area. The site in question clearly sits within an area of buildings characterised by large plots and this character should be carried through in the design of this development.

This dense layout would result in an over developed feel to the area, crowding Mountfield house and impacting on the open character of this part of the Conservation Area. There is also some potential for impact on the setting of the Downe House and its associated Registered Park and Garden. The site and the surrounding area along Downe Street, including the registered garden, were at one point in single ownership. Its development is very much associated with that of the Downe family and the development of Downe house. While views from Downe Hall to the site are relatively limited, we would be concerned that the overdevelopment of this site would negatively

impact on the understanding of the association between these properties, on the enjoyment of Mountfield House itself and its surrounding gardens and street development. The visibility between Mountfield House and the development site is acknowledged in the 'Pre-planning report' as having a potential impact on the heritage significance of this locally important heritage asset, however the way in which this has been taken into account in the development and siting of the building is uncertain. We are also concerned that the present configuration of the development will result in it being extremely visible, and overbearing when viewed from the Chardsmead Car Park on Rax Lane. Some mention of this change of level is mentioned in the 'PrePlanning *Report'* and reference is made to the screening provided by trees along this boundary. We are concerned, however, that the topography in this area, when combined with the position of three story elements of the development at the south - western corner of the site, which sit very close to the retaining wall of the car park, will create an overdominant feature that will not harmonise with the scale and height of existing development to the west and south of the site. Confining the taller elements of the development to the centre could be a more positive approach that would lessen this impact."

A further letter from English Heritage dated 19/12/2014 stated the following:

"The information provided with this application does not go any further than that previously submitted in terms of assessing and understanding the heritage significance of the heritage assets. We are therefore concerned that the scheme is being designed without the benefit of an informed understanding of the wider context. This information is required by paragraph 128 of the National Planning Policy Framework and we would therefore once again request that this assessment is undertaken at the earliest. We continue to have concerns about the potentially negative impact that this proposal could have on the Bridport Conservation Area. While some attempt has been made to maintain the paved aspect at the front of the building the size of the amended building design continues to represent an overbearing presence within the conservation area and in particular from the Chardsmead car park on Rax Lane. lt was suggested in previous advice that a positive alteration would be to create a stepped approach that contains the taller elements of the site towards the centre. Unfortunately this advice has not been taken on board and the resulting amended scheme continues to present a very tall, uncharacteristically institutional elevation to the car park and the town beyond."

Appeal

Statement of Case on Behalf of West Dorset District Council LPA:

"The Conservation Area appraisal provides detailed assessment of the area - the appeal site lies in the Sub Area 5 of Coneygar Hill which has an informal and rural feel although becomes more urban as it links with the town. The space around the appeal site is particularly identified as being important to the setting of Coneygar Hill and Mountfield. The increased height and massing of the proposed building will of course impinge on this space.

The adjacent Sub-Area 6 of Victoria Grove is also dominated by Coneygar Hill but is of a domestic scale of terraced and semi-detached housing. The appeal site adjoins North Street to which the existing boundary wall is a significant feature. The proposed building is positioned close to the wall and will be visually prominent above it to the detriment of the character and appearance of the area.

The appellants suggest that the impact on the proposal will be negligible on the Conservation Area, setting of Listed Buildings and registered park/garden; which is contested by the LPA, particularly as the development is much larger than the existing building in both height and footprint. The existing building is accepted as being of little architectural merit, however it is not visually prominent in the surrounding area and therefore any negative impact is very localised. Whilst it is not considered necessary to retain the existing building the proposed replacement building is not considered to be acceptable for the reasons stated and the benefits of the development referred to by the appellants are not considered to be sufficient to outweigh this.

Site Visit of As Built Scheme Summary: (Date, key photos, map)







Development sits relatively well within its wider surroundings. There are a number of other modern developments along Rax Lane, many of which are three storeys, and there are some larger commercial buildings in the vicinity. Along North Lane, the properties are of a much smaller domestic scale and so the development is more prominent at this angle, but the building is set behind a car park with a lot of tall tree screening.

It is hard to ascertain a level of impact on Downe Hall (listed and registered park) as this is private land and so no access was obtained.

Comparison of As Built Scheme against PreLimited visualisations so hard to compare.

development
Information:

Summary of

Would have been very useful in understanding significance of assets and the site itself related to those assets. Would have also proven useful in communicating those to

Map /	developer and then refining scheme accordingly. Focus from applicant seems to be on
Alternative	surrounding heritage assets, but focus from English Heritage and Conservation Officer
approach to	is more focussed on the site's location within the former walled garden of Downe Hall
setting:	and the impact on the listed hall and surrounding registered park.
Key Findings:	Very limited visualisation information supporting scheme. Later photomontages and
	supporting information provided at appeal which would have assisted in understanding
	level of impact. Setting of assets are set out but focus is not on Downe Hall which was
	the concern by decision-makers. In addition, it is unclear the level to which pre-
	application discussions had helped, and how heritage assessment had helped refine the
	scheme. Very simple visualisations were set out as part of application, but
	supplemented by more robust photomontages and supporting information at Public
	Inquiry. If this had been presented at an earlier stage then it may not have been refused,
	or better presented at appeal to communicate the impact.

Proposal Name:	Land off Shepham Lane, North of A27, Polegate, East Sussex, BN24 5BT (Shepham
-	Wind Farm)
Application /	WD/2013/0346/MEA - 2011
Appeal	
Number:	APP/C1435/A/13/2208526 - 2014
Proposal	Installation of three 115m high (blade tip) wind turbines and associated infrastructure.
Description:	0 (* **********************************
	Application: Originally 5 wind turbines (126.25m to blade tip) – withdrawn July 2012.
	Then re-submitted as 3 wind turbines with a reduced height (115m) – Planning
	Permission was refused by Wealden District Council in May 2013.
	Termission was relased by Wearden District Council in May 2010.
	Then went to Appeal in July 2014. Appeal allowed January 2015.
Heritage Assets	GI Listed Church of St Mary Magdelene, Wartling; GII Listed Otteham Court, GII*
Considered:	Listed (& SAM) Remains of Chapel at Otham Court, Unlisted Glyndley Manor &
Considered.	Pevensey Castle (SAM).
Summary of	Original Application
_	
Supporting	Included an Environmental Statement (2011) "2011 ES" and a number of additional
Documentation:	documents addressing the effects of reducing the proposed number of turbines from
	five to three ("the 2013 ES Addendum").
	2011 ES – incorporated Chapter 5 – LVIA and Chapter 9 – Archaeology and Cultural
	Heritage. The 2011 ES also incorporated a ZTV analysis.
	Comments on viewpoint selection – from 2011 ES:
	"The assessment of effects on landscape and visual amenity is aided through
	consideration of a series of viewpoints. The viewpoints have been selected to be
	representative of the visual sensitivities of the Study Area and locations in the general
	vicinity of the viewpoint from which clear views of the turbines at the Development
	may be obtained. In many areas with theoretical visibility, views of the turbines are
	screened by hedges, trees and buildings. The viewpoints therefore represent specific
	locations from which the maximum effect on landscape and visual receptors can be
	assessed.
	The assessment of change at the viewpoints helps inform the assessment of landscape
	and visual effects of the development. The viewpoint information is considered in
	conjunction with the Zone of Theoretical Visibility (ZTV), Ordnance Survey map, aerial

photography and site visits to establish the extent of likely actual visibility and hence the magnitude of effect.

The selected viewpoints were agreed through consultation with Natural England, the South Downs National Park Authority, High Weald AONB, the Local Planning Authority (Wealden District Council), East Sussex County Council, Eastbourne Borough Council, Lewes District Council, Rother District Council and East Sussex County Council. They illustrate clear views of the turbines from locations within the Study Area which cover a range of:

- Designated landscapes;
- Landscape Character Types;
- Distances and orientations from the Development site; and
- Receptor types.
- ** English Heritage / Historic England were not one of those consulted re: viewpoints.

Comments on ZTVs, Wirelines and Photomontages from ES 2011

"Figures showing ZTVs have been prepared, based on the visibility of the blade tips of the proposed turbines and the nacelles (or hubs) respectively, to identify the different areas from which any part of the blades and hubs, or only the blades, may be visible to a viewer 2m in height, in the absence of buildings, trees or other vegetation. These ZTVs are provided at Figures 5.4 and 5.5 respectively. To accord with best practice the ZTVs are not 'clipped' to the 35km boundary. However, the Cumulative ZTVs (Figures 45.1 - 45.3) are clipped to 35km (for all sites) to allow an assessment of the cumulative effect to be made on a comparative basis.

Wirelines

In addition to the ZTVs, computer generated line drawings (wirelines) indicating the outline of the Development have been prepared for each view that has been assessed. These wirelines are geometrically accurate and represent the form of the Development superimposed on a digital terrain model.

The wirelines are representations of the maximum theoretical visibility of the Development. They are based on topographic data but take no account of other visual screening (typically buildings, trees and hedgerows).

Where cumulative sites may be visible on the cumulative wirelines, their location is indicated. The Shepham Wind Farm is identified in blue.

Photographs and Photomontages

Photography has been undertaken at all of the identified viewpoints to produce a composite panoramic image replicating the view available on-site (see Figures 5.11 – 5.34). In most cases these photographs represent a 720 field of view. Where a wider field of view has been necessary (up to 1440), due to the close proximity of the viewpoint to the proposed Development or the particular character of the view, the correct viewing distance remains the same.

For a number of the viewpoints, a photomontage has been provided which has been produced using the photographs taken on-site, superimposing a (geometrically accurate) wireline image onto this, and producing a rendered composite image. For the remaining viewpoints, a photo-wire has been produced which is an image produced in the same way as a photomontage, but is unrendered.

Wireline images are provided for each viewpoint to illustrate the location of the Development relative to the cumulative schemes within a given panorama. These wirelines are provided at included angles of 720 [degrees], although there may be more than one required dependent on the juxtaposition of the cumulative sites considered.

A plan indicating the locations of the viewpoints is included for each viewpoint which shows the precise viewpoint location, elevation and direction of view. Details are also provided on the date and conditions of assessment."

The 2011 ES figures included the following visualisations from:

32 representative viewpoint locations were included in the ES 2011. These included 2 viewpoints from heritage locations within the locality (Herstmonceux Church and Pevensey Castle Turret).

Viewpoints from the following heritage assets were not included within the 2011 ES:

- View from Wartling Church (Grade I);
- View from Otteham Court or Remains of Chapel at Oteham Court (Grade II*);
- View from Glyndley Manor (Non-Designated).
- No views from other notable Heritage Assets in the locality (e.g. Folkington).
- Or any other heritage assets (as those detailed under 'Heritage Assets Considered'

These were wide angle photos from each viewpoint together with wirelines, photowires & photomontages (in some instances). Examples for the 2 heritage asset viewpoints are shown at the end of this document.

A ZTV - Blade Tip (126.25m) & Hub (80m) was also included in ES 2011.

"The ZTV (Figure 5.4) has been used to identify any theoretical visibility of the Development from these Registered Parks and Gardens. Those with theoretical visibility have been assessed later in the chapter, whilst those displaying no visibility are considered to experience no effects as a result of the proposed Development and have therefore not been included within the assessment. Charleston manor is therefore not carried forward to the assessment.

Those with potential visibility and taken forward to the assessment stage are considered generally to have a high sensitivity to the proposed Development in light of the potential effect on views and settings of these nationally important properties. Specific sensitivity will depend upon the context of the RPGs and the Development, and will be discussed further during the assessment stage.

The closest RPG is Wootton Manor which lies circa 2.85km west of the proposed Development."

Amended Application - ES 2013

35 representative viewpoint locations were included – along the same lines as those in the ES 2011 but with 4 more viewpoints (2 from 1066 Walk – long distance path & 2 from other local footpaths – i.e. none from Heritage Assets). Amendments were made to reflect the height of the turbines.

A revised ZTV was included at 115m and 70m – given a reduction in the height of the turbines.

Viewpoint 28 (Figure 5.30) – Pevensey Castle Turret and Viewpoint 29 (Figure 5.31) – Herstmonceux Church are the are the only 2 taken from a nearby Heritage Asset.

Good quality, wide angle, colour photographs were taken of the existing view towards the wind turbines from Herstmonceaux Church. Wirelines were included, together with 2 good quality photomontages. The location of the photomontage for Herstmonceaux

church looks strange though – as it is taken with soil immediately in front, so this does not incorporate views from within the church yard, which is likely to feel very rural.

The viewpoint from Pevensey Castle turret included a good quality, wide angle, colour photograph of the existing view, looking out over the scheduled monument (so including views across the Heritage Asset), a wireline, 2 photowires (at different zoomed-in levels) and a cumulative wireline showing the impact of both Shepham Wind Farm and Glyndebourne Turbine.

The visualisations appear to be of a good quality, apart from the location at Hertmonceaux Church.

Appeal

Planning Inspector: "... In the course of the inquiry it became clear that neither the 2011 ES or 2013 ES Addendum included information on the potential cumulative impacts of the current proposal and the recently consented Rampion offshore wind farm. A request that Further Environmental Information (FEI) be supplied, to enable an assessment of the incremental cumulative landscape and visual impacts, and the sequential cumulative impact on the South Downs Way."

Non Technical Summary in FEI

"A Public Inquiry has been held in respect of the proposed wind farm at Shepham Lane, Polegate, Eastbourne (PINS reference APP/C1435/A/13/2208526). Shortly before this Inquiry opened the Rampion Offshore Wind Farm received consent for development based on the Rochdale Envelope within a specified development zone. In light of this, the Inspector at the Shepham Wind Farm Inquiry requested that the application Environmental Statement is updated with Further Environmental Information (FEI) to specifically address potential cumulative landscape and visual effects as it relates to the eastern part of the South Downs National Park. This FEI considers this matter and specifically addresses how the proposed development would have a bearing upon the Landscape Character Areas (LCAs) associated with the South Downs as well as the visual amenity as it relates to a number of viewpoints that were considered separately as part of the Shepham Wind Farm LVIA and the Rampion Offshore Wind Farm Environmental Statement SLVIA. The Inspector also specifically requested that the South Downs Way, a National Trail is also examined as part of the assessment to establish how this route would be affected from a sequential cumulative visual amenity perspective.

The approach adopted considers that there is an existing baseline situation which includes the operational wind turbine at Glyndebourne and the consented Rampion Offshore Wind Farm. These two projects in combination have a bearing upon both the existing characterisation and the visual amenity of the South Down National Park. In light of this, this FEI considers how the addition of the Shepham Wind Farm would have a bearing upon this situation which is regarded as incremental, cumulative assessment. This aspect is considered with respect to landscape character and visual amenity as it relates to the viewpoints and also the South Downs Way. With all three wind energy projects in place, these wind farms would have an 'in combination' cumulative effect upon the South Downs, which is also considered in this assessment on a separate basis.

Viewpoint Visual Amenity Analysis

Consideration has been given to the visual effects upon the viewpoints included in the LVIA (Shepham Wind Farm ES 2011 and Addendum 2013) and additional cumulative viewpoints identified in the Rampion Offshore Wind Farm ES. This assessment examines the incremental cumulative change as a result of the addition of the proposed Shepham Wind Farm as well as the in-combination visual effects of all three developments. In general terms the addition of the proposed Shepham Wind Farm would have little substantive effect upon the visual amenity associated with the South Downs. In close quarters where the proximity to Shepham Wind Farm is closer visual effects would increase and would result in localised significant effects. Such locations are however limited. The in-combination visual effects upon the identified viewpoints with all 3 developments in place would result in widespread intervisibility between all three developments and would result in a medium cumulative magnitude of change which would be significant.

Further Environmental Information (FEI)

An FEI dated 20/8/2014 was provided described as "Updated Cumulative Landscape and Visual Assessment for Shepham Windfarm". This included Viewpoint Analysis, Landscape Character Analysis, Effect Upon South Downs Way (Eastern South Downs) and Assessment Methodology.

New visualisations included the following:

- ZTVs for Rampion Offshore Windfarm (Appendix 3);
- Cumulative ZTVs for Rampion Offshore Windfarm and Shepham Windfarm (Appendix 5);
- 360 Degree Photoviews Viewpoints 2,3, 4 and 21 (Appendix 10) None of these were from a Heritage Asset;

• Cumulative wireframes Rampion Offshore Wind Farm, Glyndebourne Wind Farm and Shepham Wind Farm for viewpoints 2,3,4,17, 20 & 21 (Shepham Wind Farm) and Viewpoints 19, 20 & 21 (Rampion Offshore Wind Farm) (Appendix 11).

Key Findings about Setting and

Acceptability: (supporting documentation, local authority, Inspector)

Original Application:

The following is from Chapter 9 of the 2011 ES – Cultural Heritage.

"Details were taken of all heritage assets, including listed buildings, within defined search radiuses agreed in advance with Greg Chuter of the Archaeology Section of the Environmental Advice Team at East Sussex County Council (ESCC). The Study Area comprises three areas: the Development area, a 2km radius of the Development site (which includes all heritage assets on the HER database) and, for a wider landscape perspective, a further study radius of 5km."

Assessment Methodology and Significance Criteria

"The assessment has been carried out in accordance with a model brief produced by the Association of County Archaeological Officers (1993) and the Institute of Field Archaeologists' Standard and Guidance for Desk-based Assessment (1994, rev. 2008).

The detailed methodology is described in Appendix 1 of the DBA (Technical Appendix A9.1) and is summarised below. The significance of the effects upon identified Archaeological and Cultural Heritage receptors depends primarily on a combination of the sensitivity of the receptor and the magnitude of change predicted at that receptor. The following terminology is utilised within this assessment to categorise these factors:

- The sensitivity of a feature is defined on a scale of High, Medium and Low (generally equating to National, Regional and Local importance); and
- The magnitude of an identified effect is defined as High, Medium, Low or Negligible.

In order to fully assess the significance of the effects, two further criteria are utilised:

- The type of effect, i.e. whether it is positive of negative, neutral or uncertain; and
- The probability of the effect occurring using a scale of certain, likely or unlikely.

The findings in relation to all of these criteria are brought together to give an assessment of significance for each effect. Effects are considered to be of major or minor significance, or not significant, where only those effects of major significance are considered to be significant in EIA terms. This assessment relies on professional judgement rather than any scoring of the criteria.

The nature of the effect, i.e. positive, negative, or neutral, of a wind farm development on the setting of cultural heritage assets is a subjective matter, although this is normally taken to constitute a negative effect as the turbines will generally constitute new and different elements to the setting of designated features, either to their imagined contemporary setting or to their existing setting.

The following additional data sources were consulted for this report:

- A search of the East Sussex Sites and Monuments Records database for Scheduled Ancient Monuments, non-designated archaeological sites and monuments, and all listed buildings within a 2km radius of the Development site;
- A search of all Scheduled Ancient Monuments (SAMs) within a 2-5km radius of the Development site;
- An examination of available topographical evidence;
- Examination of the Zone of Theoretical Visibility (ZTV) map provided by Galliford Try Renewables (GTR) (Fig. 3 in DBA, Technical Appendix A9.1);
- An inspection of available geological sources (maps/borehole logs/trial-pit data) relevant to the site, if available;
- A map regression exercise looking at the cartographic evidence for the Development site;
- Photographs held by the English Heritage National Monuments Record Aerial Photographic Library (NMR), with the aim of investigating whether the archaeological remains in this landscape could be more extensive than the recorded data indicates;
- An assessment of existing impact on the site;
- An assessment of relevant published and unpublished archaeological sources, including searches through local archaeological journals;
- A walk-over of the Development site;
- A field assessment of the visual impact on and heritage assets listed in the surrounding area; and
- Published sources listed in the References.

Stakeholder Views on development outcome:

Original Application

Wealden District Council (9/5/2013): Refusal

Officers recommended granting consent but scheme was refused by members at committee for the following key reasons.

If not commented, why not (where appropriate)?

"...The proposed wind turbines by reason of their scale, form and position would create dominant and intrusive features in views from the South Downs National Park (including parts of the South Downs Way) that would erode the dramatic landscape character and sense of perceived scale of the northern Chalk Escarpment to the

detriment of the landscape character of the South Downs National Park and leading to erosion of the enjoyment of its special qualities...

The proposed wind turbines by reason of their scale, form and position would create dominant and intrusive features that, from within the views from the western parts of the Pevensey Levels and the immediacy of the site, would project significantly as intrusive large scale moving structures above the skyline of the downland scarp which forms an important backdrop to this landscape area. These important and unique views to the dramatic scarp and skyline of the South Downs National Park, being of great importance to the enjoyment of the identified special quality of the dramatic scarp and skyline of the National Park from a remote and tranquil location with severely limited evidence of any other urbanising structures/development to detract from the drama of the Scarp Slopes and Skyline. As a result the development would substantially harm the landscape character of the Pevensey Levels and the enjoyment of the Special Qualities of the South Downs National Park, failing to meet the two purposes of the National Park...

English Heritage (Letter Recd 27/3/2013): "... English Heritage's main objection to this proposal – i.e. that we did not think that the applicant had adequately met the requirements of the NPPF because they had not adequately described the significance of the heritage assets affected by the development – has been overcome by the report by Heritage Collective and the revised report by Archaeology South East.

...There is likely to be some harm to their settings and this should be weighed against the public benefits of the proposal in accordance with para 134 of the National Planning Policy

East Sussex CC: Archaeology Section. No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation, including a timetable for the investigation, which has been submitted by the applicant and approved in writing by the local planning authority and the works shall be undertaken in accordance with the approved details.

Appeal

In relation to heritage matters the Inspector stated that:

"In this case, no designated heritage assets would be physically altered by the proposed development. Rather, it is the indirect effect of the development, in terms of its impact

on the setting of heritage assets, that needs to be considered. The 2011 ES incorporated an assessment of the heritage assets that may have been affected by the original fiveturbine proposal, and I note that English Heritage raised a number of concerns about the extent to which the significance of these assets had been adequately described and understood. A revised assessment was undertaken and included in the 2013 ES Addendum, together with a further assessment of four specific heritage assets identified by English Heritage as likely to suffer the greatest harm: the chapel at Otham Court, Priesthawes, the Church of St Mary Magdalene at Wartling, and Glyndley Manor.

English Heritage subsequently confirmed that this additional material addressed its previous concerns about providing an adequate description of the affected assets' significance, and agreed that the proposed development would be likely to cause less than substantial harm to heritage assets, including the four identified as likely to suffer the greatest harm. I visited each of these in the course of my site visits.

Glyndley Manor is not a listed building, or a "designated heritage asset" for the purposes of the NPPF. The manor house dates from the 16th Century but has been much altered. The ornamental gardens to the north, east and southeast contribute to the heritage significance of the house, as does its wider parkland setting. On the south front, the carriage sweep has been re-shaped to form a large (20m x 40m) car park and tennis court, and it is in views from this south front that one of the turbines would be visible at a distance of just over 1km. The introduction of an incongruous modern structure in one of the principal outward views from the house would clearly be a noticeable change, but this is not the only view outward or the only component of the setting; further, the turbine would be seen in the context of the existing car park. I consider that the harm caused to the significance of this heritage asset would be slight, and considerably less than substantial.

The Church of St Mary Magdalene at Wartling is Listed Grade I. It derives much of its heritage significance from the special architectural, historic and artistic value of its fabric and construction but the surrounding churchyard, which includes a number of mature trees, also contributes to its significance. The spire of the church is visible against the skyline in a number of views from lower ground to the south and south west, which reinforces its significance as a landmark in the wider historic landscape. In views toward the south-west from within the churchyard, through gaps in the vegetation on the southern boundary, all three turbines would be visible some 6km away. At this distance, they would form only a very small component of the overall view. While there is a historic relationship between the church and views toward the

south-west, the impact on this part of the setting of the church would be very slight, and in my judgment would have only a very slight adverse impact on the significance of this designated heritage asset.

Priesthawes is Listed Grade II, and dates from the 16th Century. Its heritage significance lies largely in the architectural and archaeological interest of its historic fabric, but includes its historical connection with its surroundings. Its setting contributes to the latter aspect of its significance through its strong connection with the private landscaped gardens to the north-east, and to a lesser degree its visibility, from Hailsham Road, as a familiar feature in the local landscape. The proposed turbines would not intrude into any important views toward the house, would not be visible in principal views from the windows of the listed building to the north-east, and would only be seen from the upper (bedroom) windows of the south-west elevation, over the roofs of the intervening service buildings. I agree with the 2013 ES assessment's finding that the effect on the setting would be relatively contained and localised, and the impact on significance would be minor.

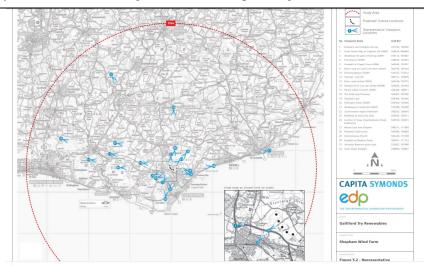
The Chapel at Otham Court is Listed Grade II*, and is also a Scheduled Ancient Monument. Otham Court itself is Listed Grade II. The heritage significance of the chapel, and the house, derives mainly from their archaeological and historic interest as structures dating from the 14th and 15th Centuries, and also their architectural and artistic interest. The chapel is an unassuming building sited toward the side and rear of the house, and its setting is largely restricted to the residential curtilage of the house; this contextual historic relationship contributes to the heritage significance of both buildings. While the surrounding agricultural land is of contextual and historical relevance, the relationship is difficult to discern from points close to the listed buildings themselves due to intervening grounds, outbuildings and boundary trees. There is no indication that the chapel and the house were intended to be buildings from which to look out in any direction, and no evidence of a historic garden layout in association with either the house or the chapel. There are no positions from which the proposed turbines would be visible above the buildings, and no views toward them into which the turbines would intrude. The turbines would not be visible from within the chapel. From outside the chapel and from the garden to the east of the house, and to a lesser extent from windows in the east elevation of the house, the blades of the turbines would be visible in views to the east, but would be filtered by intervening trees in the foreground and middle distance.

Taking all of this into account, I consider that the harm caused by the proposed development to the significance of these two designated heritage assets would be slight.

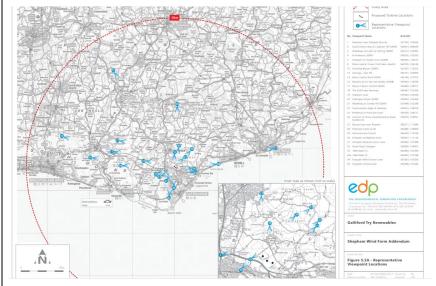
I have given careful consideration to the other heritage assets identified as potentially affected by the development proposal, and visited a number of them in the course of my site visits, including Pevensey Castle. While the proposed development would result in a visual change to the setting of some of these heritage assets, I am satisfied that these changes would not in any instance be harmful to the setting, or the significance, of the heritage assets in question.

Nevertheless, harm to the significance of the five heritage assets identified above is a factor that must be weighed in the overall planning balance.

Site Visit of As
Built Scheme
Summary:
(Date, key
photos, map)



Viewpoints - 2011



Amended application Viewpoints - 2013





Pevensey Castle – Photowire 2013

Comparison of
As Built Scheme
against Predevelopment
Information:



Photo from Pevensey Tower towards turbines – Site visit October 2018



Otham Court – Site visit 2018 with turbines visible in the background



Priesthawes Farm – photo taken from driveway towards turbines

The site visit does not suggest any particularly differing conclusions to the assessment but provides the understanding behind the requirement for a re-assessment in 2013 including a number of heritage assets which were not considered in previous viewpoints.

Summary of Diagrammatic /

This form of approach would have helped ensure that potential key issues were identified early in the development process i.e. during the first application. This would

Map / Alternative approach to setting:

have helped ensure that the original assessment was supported by material that identified the assets, described their significance and demonstrated the potential impacts through appropriate visualisation material (in this vase probably wireframes). This would have potentially removed EH (now HE) objections at an early stage and may have removed the need for such a comprehensive FEI assessment. It may have also removed the need to consider heritage issues at the Inquiry.

In addition, it would have also provided an early check on the historical / functional relationships of setting, beyond visibility and inter-visibility, which the Inspector was reliant upon when considering harm to significance.

Proposal Name:	Monk Bar Garage
Application /	13/03338/FUL
Appeal	
Number:	
Proposal	Granted consent by York City Council
Description:	
	Erection of two dwellings and garage block with one residential flat following
	demolition of existing buildings
Heritage Assets	York Minster and City Walls (Scheduled Monument) – the site lies immediately to the
Considered:	north of the Scheduled area and thus forms part of the setting of York Minster as well as
	the City Walls, York Historic Core Conservation Area (Monkgate Character Area). The
	walls are further designated a Grade I listed building and there are numerous Grade II
	listed buildings in the adjacent Lord Mayor's Walk.
Summary of	A committee report mentions a project model: this may be retained by the local
Supporting	authority.
Documentation:	Photographs of models exploring massing and the relationship to surrounding context
	are included in the D&A statement. Sketches that give an indication of the site's
	relationship with the walls are also included as an appendix to the Design and Access
	Statement.
	https://planningaccess.york.gov.uk/online-
	applications/files/968B8BA659B29D9FFB266C6635942A7C/pdf/13 03338 FUL-
	DESIGN AND ACCESS STATEMENT-1446771.pdf
	Some of the supporting images show some of the surrounding context filled in
	schematically.
	https://planningaccess.york.gov.uk/online-
	applications/files/48B62E5B94B66FDA89701D846BA0B8D1/pdf/13 03338 FUL-
	CONTEXTUAL_ELEVATIONS-1446779.pdf
Key Findings	The applicant's Design and Access Statement identified the site's visual amenity before
about Setting	the redevelopment as 'very detrimental, with poor quality dilapidated workshops and
and	garages'
Acceptability:	
(supporting	The Applicant's Heritage Statement (FAS Heritage 'Monk Bar Garage Site Lord Mayors
documentation,	Walk, York' listed on York Planning Portal as 'Archaeological Statement of
local authority,	Significance') stated in its opening summary 'It is current state, the site detracts from
Inspector)	the character of the Conservation Area and the setting of adjacent designated heritage
	assets. The extant buildings are not in keeping with the 19th-century streetscape, or the
	historic character provided by the city walls and defences. The proposed design is for

three dwellings, two storeys in height, to be constructed using York Handmade brick. Elements of design intended to harmonise with the surroundings include the use of zinc roofing to reflect grey slates of adjacent buildings, small window lights to emulate traditional fenestration, and a green roof space to enhance views from the city walls.'

Section 5 of the same report stated: 'Removal of the extant garage buildings provides an opportunity to enhance the heritage significance of this site. The proposed erection of two-storey buildings is in keeping with the extant 19th-century terracing along this site of Lord Mayor's Walk and with the historic development of the property, when terraced housing extended across the frontage. The proposed use of handmade brick, and sympathetically -designed windows and roofing should tie in with the character of this part of the Conservation Area, and should improve the setting of the Listed Buildings in the immediate area. Well-designed organic roofscape will contribute to and enhance views from the City Walls; views currently include green and leafy environments both inside and outside the walls in this area'

The applicant's Design and Access Statement references English Heritage's Positon Paper regarding the development – this is not listed as a document on the planning portal. EH's position as outlined in this paper, regarding the City Walls at least, was summarised by the applicant in the following three bullet points:

- that any development outside the walls should be no higher than the walls
- *developments should avoid adverse intrusion into the walls*
- And should not reduce the dominance of the walls, ditch and bank.

The planning committee report can be found here

 $\underline{http://democracy.york.gov.uk/documents/s87852/Monk\%20Bar\%20Garage.pdf}$

It summarises the council's planning officer's position thus:

The scheme has officer support. The existing buildings and hard-standing detract from important views and the setting of York's defining cultural assets — the city walls with the Minster beyond. The proposed new buildings (units 1 & 2) respond to this sensitive context by providing a transition between the blank gable of the existing C19th buildings and the landscape bank and ditch. The greater part of the development would move away from the city walls to respect the high significance of these important heritage assets and to enable their immediate setting to be greened. Proposals would improve the quality of the foreground to these assets, enhancing their setting and views (of the listed buildings) and thereby better revealing their significance.' (Para 3.1)

paras 4.9-11 state: 'The design is contemporary and proposes high quality materials (including York hand-made bricks and slim metal framed windows). The materials,

layout and massing are considered, so the development would respect the historic environment and setting of the grade 1 listed City Walls. The proposals have been revised since the original submission, adding clarity to the design and large scale drawings. The design has developed with guidance from officers and English Heritage, who are in support of the scheme also...

The layout and massing is considered to produce a scheme which would retain views through the site, of both the City Walls and Monk Bar. The two storey building would be on the footprint of the garage building it would replace. It would be some 800mm taller in maximum height, but the pitched roof form would move the massing away from the bank of the walls, making the walls more prominent. Apart from the two living rooms the second building would be single storey. The building would only be 6m wide at first floor level. Distant views through the site, towards Monk Bar would be provided and the setting would be enhanced by moving the buildings away from the City Walls and its bank.

The development would be successful in maintaining the character of the street. The gradual step down to single storey means the massing does not appear out of place along the street, but sits comfortably with the terrace. Although this approach conflicts with recommendations in the CYC conservation area appraisal (for single storey development only) it results in a balanced scheme, which meets the English Heritage recommendation for new buildings to be lower in height than the walls. Officers are content that in this respect the dominance of the City Walls is reasonably maintained.'

Interestingly, the report mentions that the EH position paper also explores the idea of clearing the site and reinstating the ditch and ramparts, but presumably concludes that this scheme would be equally as acceptable.

Stakeholder Views on development outcome:

If not commented, why not (where appropriate)?

The Conservation Area Advisory Panel were consulted: 'The panel expressed a general preference that the site should not be developed. However, there was agreement that where this prominent site is to be developed it must demonstrate control in responding to context. The panel suggested that the proposal had significant potential. However, its success requires a rigorous resolution of the details picking up the rhythm of the adjacent terrace. The brick/window and eaves details are all critical and level of information originally submitted did not evidence sufficient control of these important details.'

York Civic Trust stated were also consulted: 'Consider that the present height and footprint of buildings on-site should not be exceeded. As recommended by the English

Heritage topic paper on future development affecting the City Walls. The application constitutes an overdevelopment of the site and because of its height and massing, would have a detrimental impact on the setting of the City Walls.'

Site Visit of As
Built Scheme
Summary:
(Date, key
photos, map)

October 2018.

Scheme fits in well with wider context, allows views to the city walls and beyond. Forms an organic shape at the end of a more formal terrace, dropping down to allow the appreciation of the city walls and heritage assets beyond, in particular York Minster which is a particularly spectacular and unusual view taking in this aspect of the Minster with the city walls in the foreground. The scale of the buildings is appropriate and green space developed surrounding the development, particular at the far end where the walls meet the ditch and former moat extending along the side of Lord Mayor's Walk.







Comparison of
As Built
Scheme against
Predevelopment
Information:

The visualisations used were fairly simplistic in the form of hand drawn sketches, and a physical small-scale model. However, these sketches were particularly useful in providing a context for the wider street scene, in understanding the appearance and scale in comparison to the city walls, existing buildings.

The level of pre-application discussions undertaken with the Conservation Area Advisory Committee and Historic England have clearly refined the building, its style,

	suitability and this has been presented well in the heritage statement and sketches, and
	so ultimately in the final design.
Summary of	The site was well understood and so diagrammatic mapping would not have revealed
Diagrammatic /	further understanding of significance and setting, and the applicant seems to take this
Map /	on board.
Alternative	
approach to	
setting:	
Key Findings:	 The visualisations were useful in gauging the impact, though simplistic sketches and providing a wider context Due to the small scale of development more technical visualisations were not needed The input of Historic England was key to helping the developer to refine original proposals, understand heritage Statutory consultees due to the presence of Scheduled city walls to the rear of development Visualisations did help, but additional visualisations that would be very simple to produce such as annotated photograph showing views of existing garages, and views beyond, with simple annotation of where new development would be proposed to give an idea of scale.

Proposal Name:	Low Marnham
Application /	APPLICATION REF 30/11/00005
Appeal	
Number:	http://publicaccess.bassetlaw.gov.uk/online-
	applications/applicationDetails.do?keyVal=ZZZY7FCSXT845&activeTab=summary
Proposal	Biomass fuelled combined heat and power plant, auxiliary boilers, product silos, new
Description:	offices, revised trailer and car parking, associated facilities, landscaping and internal
	circulation roads at Marnham Road, Low, Marnham, Newark
	Refused by local authority.
	Allowed on appeal.
Heritage Assets	St Wilfrid's Church (Grade I listed), the Grange (Grade II).
Considered:	
Summary of	Application: Simple elevations, plans and heritage statement
Supporting	Appeal: Design Statement, 3D model views
Documentation:	
	An LVIA, which assessed views from in front of the Grange and St Wilfrids
	Churchyard, was submitted in Jan 2012.
	A Zone of Theoretical Visibility was included as an appendix to the LVIA. This does not
	have listed buildings or any other heritage assets plotted on it, so its efficacy for heritage
	evaluation is lessened. The method of its production is explained, but not the rationale
	for not depicting sensitive receptors.
	In August 2012, 4 montages showing the completed development as completed, at 5
	years from completion and at 10 years from completion, were submitted.
	One of these RT8, is the view from the Grange (Grade II). One from the Churchyard –
	which would be viewpoint 9 – is not included on the Bassetlaw Planning Portal and
	does not appear to have been undertaken. The rationale for this may be that the ES and
	LVIA had recorded a substantial adverse effect on the viewpoint 8, but not that to 9.
	http://publicaccess.bassetlaw.gov.uk/online-
	applications/files/75C18ED092D22666CA3533FEFE3CB68A/pdf/30 11 00005-
	VIEWPOINT RT8-180518.pdf
Key Findings	Applicants findings:
about Setting	

and
Acceptability:
(supporting
documentation,
local authority,
Inspector)

Para 11.19 of the applicants original Environmental Statement stated: "It is assessed that though there will be little impact in terms of loss of existing landscape features, the proposed development would be visually prominent in the landscape and have the effect of urbanising landscape character further. … In terms of impact on the setting of St Wilfred's Church, it is considered that due to its position and the intervening existing buildings, including the large processing building on site, the proposed development is unlikely to have a significant effect and the magnitude of change is assessed as "slight adverse".

Para 5.14 of the LVIA states: 'St Wilfred's Church in Low Marnham is a Grade 1 listed building. The church is located within Low Marnham village and is surrounded by residential properties and traditional farm buildings. As viewpoint 9 illustrates the site and its existing development is quite well screened from the church by the existing properties within the village. However the roof of the process building and existing chimney are visible from the church grounds and form part of the existing setting. The existing setting of the church is therefore not wholly rural. Further development within the site is unlikely to have a significant effect on the setting of the church. The church is considered to be a highly sensitive landscape receptor and the magnitude of change to the setting is considered to be low resulting in a slight adverse effect on the setting of the grade l listed church.

Bassetlaw District Council

The Planning Inspector summed up Bassetlaw's position as 'The Council's case is based upon the unacceptable impact on landscape character and significant harm to visual amenity.' The Council had stated that the relevant local policies from the 2011 Core Strategy in making the original decision — and thus, it is reasonable to assume, to its opposition in the PI — had been Policies DM1, 4 and 10: respectively these are Rural Economic Development; Design and Character, and Renewable and Low Carbon Energies. Policy D8, The Historic Environment, was not invoked, and thus the local authority's opposition does not appear to have centred on the impacts to local heritage assets.

Inspector's Conclusions:

Para 266-272 of the Inspector's Report states: 'PAG draws attention to the response from English Heritage when consulted on the proposed Thermal Oxidiser. Thus, although the immediate setting of churchyard and village can be described as having retained its integrity, the existing factory with its associated chimneys is recognised as already having had a harmful impact... the better quality views of St Wilfrid's are

generally those which are close to the church, since they allow appreciation of the complete composition. This is particularly so from the south west, within the village and the churchyard... In views from the south west, the Pears site lies to the rear so that the appeal proposal would have little effect on these key views. There would, however, be views out of the village towards the proposed development, including from points near the church. Given the limited views available, there would nevertheless be a slight adverse effect on the setting in this respect. It is also of note that the noise from the existing plant is readily audible from this location. Although the Noise Assessment is directed primarily at the risk of an increase in night time noise levels, it does conclude that the use of acoustic barriers will lead to a reduction in noise levels at Church Farm Cottage, adjacent to St Wilfrid's. It would be reasonable therefore, to expect that there would be a similar improvement with regard to noise levels within the churchyard. This would be of minor benefit to the setting.

The most important medium distance views consist of the one in silhouette from the north, when travelling down the lane from High Marnham and those of the church in relation to the village from the south and south east. The 50m chimney and other taller buildings would be likely to be visible in the background to Low Marnham in views from the north so that they would intrude into this key view of the church and village. From the footpath network to the south of the village, the removal of the High Marnham cooling towers has allowed the church tower, unremarkable as it may be, to acquire a more significant landscape presence than hitherto. The existing process building and other structures on the site are already a significant feature in these views. Whilst the new buildings would be further away from the church than the existing ones, they would add substantially to the dominance of the site in these views, as a result of the greater bulk and more overtly industrial appearance of the appeal proposal. This would materially detract from an appreciation of the church in relation to the village..."

The Appellant draws attention to several ways in which the impact of the proposed development on views from the south would be lessened: that one would tend to look towards either the church or the appeal site from this perspective, meaning that it is not possible to focus on both in the same view; that this view of the church is constrained by the layout and planting of the churchyard; that the existing boiler house and chimney would be removed; and that the recently approved tank farm is to be constructed on a part of the site closer to the village. However, even taking these factors into account, I consider that the proposal would amount to substantial harm to these medium-distance views of the church and village from the south.

Para 271 and 272 states: 'The Grange is an early 18th century farmhouse which looks directly towards the northern side of the appeal site. Despite the planting along this boundary, the existing factory is clearly visible from this location so that the greater bulk of the proposed development would be similarly apparent... since this is a farmhouse it seems to me that outward views and the extent to which the surrounding area might retain its predominantly rural quality do make some contribution to its significance. Whilst the existing plant is already a highly visible feature I consider that, due to the scale and character of the development now proposed, it would result in a minor negative effect on the setting of the farmhouse... The CHP plant would intrude into several different views of and from the church, so that PAG points to the risk of cumulative harm or death by a thousand cuts. Although the effect on the more important views close to the church would be offset to some extent by a reduction in ambient noise levels, particular harm to the setting would arise with regard to the medium distance views of the church in relation to the village, especially from the south. There would also be some harm to the immediate environs of The Grange. The high quality interior of St Wilfrid's, which has been identified as the key element of heritage interest, would not be affected by this proposal so that there was general agreement that the harm to significance would be less than substantial, in the terms of NPPF paragraph 134. However, the existence of that harm would bring the proposal into conflict with the presumption against such development contained in Local Plan policy DM8.

The Inspector concluded in Para 318 'With regard to heritage assets, great weight must attach to the harm to the significance of St Wilfrid's church as a Grade 1 listed building, even though it would be less than substantial. The harm to The Grange must also carry weight commensurate with its status as a Grade II listed building. Against this, should be weighed the public benefits of the proposal. These would comprise the economic benefits, the reduction in carbon emissions, the use of renewable energy and the lower level of ambient noise. To my mind, these benefits would be sufficient to outweigh the limited harm which would be caused to the significance of the heritage assets.'

Stakeholder Views on development outcome:

If not commented,

English Heritage's response to a separate application for the site -13/01231/FULErection of a Thermal Oxidiser and Thirty Metre High Chimney – which was granted by Bassetlaw District Council on 12^{th} Feb 2014, and EH's opinion on that application was used by the Planning Inspector as indicative, or suggestive, of its likely opinion on the application for the biomass plant as a whole. However, the Inspector's report noted at paragraph 120: 'It is instructive to consider English Heritage's view, which can be inferred from their response to the application 13/01231/FUL, yet to be determined. They consider that the existing development has a harmful impact on the setting of the

why not (where church, and that the addition of a 30m chimney would add to the harm in a cumulative appropriate)? manner. Although they state that the harm from a single 30m chimney would not be sufficient grounds to refuse an application, it would be instructive to have known their view on the proposal of the present Appeal for a 50m chimney, lit at night, and a building 28m tall, 32m long and 24m wide. Approving such an application might be seen to set a troubling precedent for future decisions. English Heritage's reply to application 13/01231/FUL ran as follows: '... we do not wish to comment in detail, but offer the following general observations...we note that the existing factory with associated chimneys has a harmful impact on the setting of the Grade I listed St Wilfrids. in this context the erection of an additional 30m high chimney will add to this cumulative harm. the harm is considered less than substantial and we refer you to the relevant paragraph in the NPPF [ref] and our published guidance document, the Setting of Heritage Assets.... the application should be determined in accordance with national and local policy guidance... it is not necessary for us to be consulted again.' it appears that on the basis of that response EH were not consulted for the second larger application. There are no comments from the heritage amenity societies recorded in the original application material.

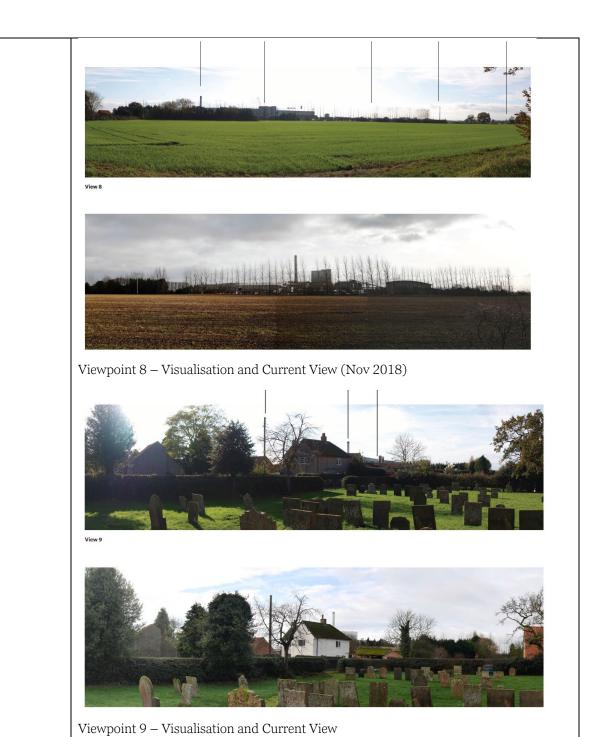
Site Visit of As
Built Scheme
Summary:
(Date, key

photos, map)

November 2018.

See below for comparison of before scheme and current views.

View







Viewpoint 18 – Visualisation and Current View (Nov 18)



View 24



Viewpoint 24 – Visualisation and Current View (Nov 18)

Comparison of
As Built
Scheme against
Predevelopment
Information:

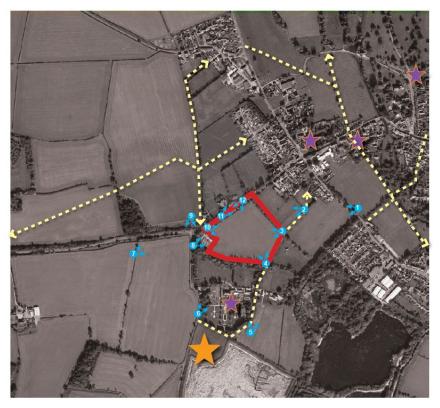
The difference between existing scheme and scale / mass of proposed scheme is visible in Viewpoints 8, 18 and 24. The removal of power station chimneys (not part of the scheme) and loss of cooling towers affects the perception of the change, but the development is certainly discernible in Viewpoint 8 & 9 which were taken from heritage sensitive locations (The Grange and St Wilfred's Church).

Summary of	There was some attempt to understand significance and setting. If a Diagrammatic
Diagrammatic /	Mapping (or similar) approach had been used early in the process to identify
Map /	understand historic and associative relationships as well as evidential and more visual
Alternative	aspects of setting for St Wilfred's Church and The Grange this its possible it may have
approach to	enabled a better appreciation of the change and acceptability of harm.
setting:	
Key Findings:	 Scheme demonstrates need to ensure that comments from key stakeholders on preceding schemes are not used to inform decision-making regarding revised / new proposals on the same site. Important that clarification is sought from key stakeholders when schemes change or are superceded by new proposals Better understanding of setting early in process could have led to the use of more relevant viewpoints and visualisations instead of being reliant on LVIA viewpoints

Proposal Name:	Land South of Cirencester Road, Fairford
Application /	APP/F1610/A/14/2213318
Appeal	
Number:	13/03097/OUT
	https://publicaccess.cotswold.gov.uk/online-
	applications/applicationDetails.do?activeTab=documents&keyVal=MQ4EAYFIA1000
Proposal	Outline application for 120 new houses on the edge of a village designated as a
Description:	Conservation Area, immediately adjacent to a Listed Building.
Heritage Assets	Burdocks Grade II Listed Building and associated Lodges and other structures Grade II
Considered:	Listed within the grounds, Fairford Conservation Area.
Summary of	The applicant submitted an LVIA, archaeological desk based assessment and a listed
Supporting	building report to the PI in 2013.
Documentation:	
	Two scheduled monuments are recorded within 1km of the study site, a Bronze Age
	barrow with associated ring ditch and a Saxon Cemetery In addition, 112 listed
	buildings are recorded; the closest being the Grade II listed Claremont House
	approximately 105m to the south. The house is known as Burdocks, but listed by
	English Heritage under the name Claremont House and formerly known as
	Churchberry Manor. However, this building is separated from the study site by mature
	planting forming a screen along the south western edge. Three associated listed
	buildings a Pavilion, Lodge and Gatepiers help form its setting and are similarly
	screened from the study site. The grounds and dense vegetation surrounding the
	grounds result in an enclosed setting for the group of listed buildings.
	There is no intervisibility between the study site and the scheduled monuments of the
	Hengiform barrow and ring ditch 260m to the south of the study site. The monuments
	setting is formed by its location within the agricultural land and the proximity of other
	nearby Bronze Age ring ditches to the south.
	Paragraph 7.1 further states:
	The Fairford Conservation Area along Cirencester Road would not be impacted by
	development within the site. The character of the approach to Fairford would
	inevitably become urban sooner, on arrival from the west with the proposed
	development. However, the proposed development would mirror the proposed
	residential development to the north of Cirencester Road, set back behind retained
	green infrastructure
	Two scheduled monuments are recorded within 1km of the study site, a Bronze Age
	barrow with associated ring ditch and a Saxon Cemetery. A listed building lies

immediately to the south west of the site but there is no intervisibility between any of these and the site.

No views were taken from within Burdocks itself or its curtilage. The closest view was taken from the gate, this was marked as View 6 on the following Figure [Fig 04 - NB the purple stars mark LBs, the large stars SMs]



These viewpoints are replicated below. No visualisations of the completed development are included.





The Listed Building Report (i.e. the only element of assessment of the historic environment) is two pages long submitted on behalf of the applicant by a subconsultant. It contains no visualisations, images, mock-ups or montages (see below).

There is a further group of listed buildings to the south of the site of the proposed development. These comprise Burdocks (an early-twentieth-century country house, previously known as Claremont House) and its associated garden pavilion, lodge and gatepiers (all Grade II). Burdocks is accessed from the east side of Marston Maisey Lane, which runs south from Cirencester Road, a short distance to the west of the site. The house and its associated structures are set within extensive grounds that are largely surrounded by belts of mature trees. The entrance front of the house faces north towards the site but the primary aspect is south over the gardens. The elements of the setting of these listed buildings that makes the greatest contribution to their significance are the grounds, and (in relation to the lodge and the gatepiers) the lane and the adjacent fields. The existing character of the site of the proposed development does not make any contribution to the significance of these listed buildings, primarily because it is entirely screened from them by a substantial belt of trees along and within the northern boundary of their grounds. No views to or from the listed buildings are possible across the site. As a result, we do not consider that the residential development of this site will harm the significance of any of the listed buildings at Burdocks.

However, the assessments above rely (in part) upon the screening effect of existing trees, which may (in the longer-term) be lost. We would therefore recommend that consideration be given to following mitigation of the impact of the new buildings:

- a) A new belt of trees within the site, along its boundary with the grounds of Burdocks, reinforcing the existing belt of planting around the northern section of those grounds; and
- b) New tree planting along the Cirencester Road frontage of the site.

I trust that this letter is self-explanatory but if anything is unclear or you wish to discuss matters further, please do not hesitate to contact me again.

The Revised Design and Access Statement (July 2013) by FPCR Environment and Design Ltd has the following visualisation of the proposals. This is the only visualisation of the scheme as built taken from a specific viewpoint.

04. Design Principles



There are others, but they are generic indicative perspective views of the houses and streetscape or indicative site plan layouts and thus don't give any sense of what the impact or local context would be.

Key Findings
about Setting
and
Acceptability:
(supporting
documentation,

local authority,

Inspector)

Heritage statement (titled Listed Building Report) was very concise and had not sufficiently explored significance and setting of the heritage assets which may have been affected by the proposals.

There were no accurate visualisations of the development. The only visualisation is more illustrative and indicative to give a flavour of the proposed development. Therefore, it is difficult to use this to gauge likely views and affects and therefore ensure that a robust assessment was undertaken. Scaled plans were produced to accompany the application.

Stakeholder Views on development outcome: The Cotswold District Council's Conservation Officer, objected on the grounds of harm (less than substantial, but still 'considerable') to Burdocks and harm (less than substantial) to the Conservation Area.

Burdocks

Para 7.8 of her proof of evidence states:

If not commented, why not (where appropriate)?

The gardens, grounds and wider landscape setting are an integral part of the aesthetic and historical values of the listed building, and therefore the significance of Burdocks. In short this is because, as a country house, it develops significance as a result of the interaction between the built form and the open landscape surrounding it. This open landscape consists both of the semi-formal gardens within the curtilage of Burdocks and of the open agricultural fields beyond, including the appeal site. Selfevidently a country house is significant both because it is a house and because it is in the "country". In this respect it is to be contrasted with, say, a townhouse or a villa set in a suburban context. In the case of Burdocks there is symbiosis between the built form and the open setting.

Para 7.10 describes the gardens to the north of the house, between it and the application site.

"This part of the grounds is now mown grass and contains one row of coniferous trees aligned north south. Historically there was a formal avenue of trees extending from the house and entrance court, to the northern boundary, as seen on the 1921-23 map at Appendix LD12. This clearly illustrates that this area was part of the formal designed setting to Burdocks, and was an integral part of the gardens and grounds, rather than ever being, within the last century at least, a parcel of land in agricultural use."

Para 7.15 and 7.16 states

The appeal site is a crucial part of the perceived open countryside context. The nature of these wider surroundings is vital not only to views but to the quality of the amenity space within the curtilage that the architect intended and that the occupants of Burdocks have subsequently enjoyed... In my professional opinion, views out to the north across the appeal site, from the house and grounds make an important positive

contribution, currently and most likely historically, to the setting of Burdocks. This context of undeveloped countryside beyond the grounds forms a key part of the enjoyment and the original design intention of the listed building, and makes a vital contribution to its aesthetic and historical values as a heritage asset. The perception of an open rural setting is critical to its fundamental character and significance as a country house, and to the symbiosis between built form and surroundings referred to in paragraph 7.8 above."

Para 8.16 states

"The proposed development would result in the perceived setting of the listed building changing in character, from rural, to town edge or suburban. This would wholly alter the context of the country house, affecting its most fundamental significance, as related to the purposes and philosophy of its original conception. In essence, it would no longer be a country house. It would come to be a country house and grounds enclosed incongruously in a suburban rather than an open landscape setting. The treed boundary between Burdocks and the appeal site would come to function as just that—a tangible physical boundary—rather than being a valuable landscape feature in its own right, marking a pleasing line of vegetation between two open rural spaces, which together create the setting to the country house. As a result its significance as a heritage asset would clearly be undermined."

She concluded, in respect to Burdocks, that although the level of harm would be less than substantial, "due to the degree of change to the appeal site and the clear perception of it from Burdocks and its grounds, I consider the magnitude of the impact to be high. And as a result of the fundamental importance of the characteristics of that setting to the significance of the heritage asset, as a country house, the harm is judged to be considerable."

The site falls outside the boundary of the conservation area itself, though is close to the boundary.

Para 9.15 of PoE, the Conservation Officer states 'The appeal site is considered to make a very important contribution to the character and appearance of the Fairford Conservation Area. As described above this is for reasons of its open undeveloped nature as an arable field forming part of a strongly rural setting that continues right up to the historic town edge, interacting with the agricultural grain of the buildings here. The appeal site is clearly perceived from within the conservation area, as well as being seen in relation to it, from the Cirencester Road and public footpath. The appeal site is a vital component of the countryside context to the historic market town, views of it forming part of the rural backdrop to the Milton End area and being so dominant in approach to Fairford on the A417. The appeal site and the attributes of the setting of the conservation area described above are of great importance to its significance as a

designated heritage asset.

Paras 10.2-4 (inclusive) state 'The development would wholly alter the open and rural character of the appeal site, and transform it into suburban townscape. Views out from the conservation area, views across to the east when approaching Fairford along the A417, as well as of course views from the public footpath along the edge of the appeal site, would no longer be of an agricultural field, but of a housing estate. The rural grain of this part of the conservation area would be harmed. The rural backdrop to the historic town, clearly perceived from within the conservation area, would be lost in this location. Open countryside would no longer continue south of the road all the way to the edge of the historic town, so the important direct relationship between Fairford and its landscape setting would also be lost in this location

Again, the level of harm was judged to be less than substantial, 'But, due to the degree of change to the appeal site and the level of perception of this change, harm to some key attributes of the setting of the conservation area is clearly identified'

In the Appeal, the Inspector states:

"Burdocks is set in extensive grounds, the dwelling itself being 100 metres or more from the appeal site boundary. What is described in the list description as the main elevation to the garden faces south, away from the appeal site, and is somewhat grander and more elaborately designed than the rear north elevation. This is plainer but nonetheless contains the formal entrance to the dwelling. The formal entrance is approached by a tarmac entrance drive, which sweeps round from the lane to Marston Meysey at the south and into an entrance court delineated by stone walls with gate piers. There is then a large area of open lawn between the tarmac drive and the northern boundary, which adjoins the appeal site.

I consider that the significance of Burdocks as a designated heritage asset arises from its architectural interest it is described in the list description as "a good example of early C20 taste" and in its historical interest as a building designed as part of the country house tradition. The principal room that I was able to enter on the ground floor, and the bedroom on the top floor, both extended for the full width of the house, and both had a window looking towards the appeal site and a window facing south over the formal garden.

Taking all of these matters into consideration, I consider that architecturally the north elevation is of somewhat lesser importance to the building than its southern elevation, and that the main orientation of the house is towards the south. Despite the previous existence of an avenue of trees to the north, this appears always to have been the case, judging from the historical photographs and illustration produced to the Inquiry."

"The boundary between the grounds of Burdocks and the appeal site is marked by a belt of mixed deciduous and evergreen trees. My site visit took place in the summer, when the trees were all in leaf. Consequently, it was virtually impossible to see the main part of Burdocks' north elevation from the appeal site, and there were only slight glimpses of the subordinate attached range of buildings to the east of the main building. There were glimpses of the lawn to the north of Burdocks beneath the tree canopies from the appeal site, but these were mainly from points very close to the appeal site boundary. Further away from the boundary, very little could be made out of the grounds of Burdocks.

Similarly, from within the main dwelling at Burdocks looking towards the appeal site only glimpses were available of the closest part of the appeal site to Burdocks beneath the boundary tree canopies."

The Inspector seems very reliant on the detail of facades and which is the most historically important, instead of seeing the location and overall design in the context of surrounding rural land as being an important aspect of the Listed Building's significance.

In addition, the reliance on the wooded fence and tree screening to preserve the setting of an asset which is at best subject to change within seasons and at worst could be removed at any time is not best practice as outlined by Historic England's GPA3.

Site Visit of As Built Scheme Summary: (Date, key

photos, map)

September 2018.







Comparison of
As Built Scheme
against Predevelopment
Information:

Very little visualisation produced so hard to compare to built out scheme.

	-
Summary of	A diagrammatic mapping technique exercise would have assisted in identifying the
Diagrammatic /	strength of the significance lying in the house being in a rural context and its immediate
Map /	surroundings. It may have also helped in communicating this to the developer and
Alternative	requesting additional information to be submitted as part of the application.
approach to	
setting:	What would have been really useful, however, would have been using this
	diagrammatic mapping approach to build a consistent case of why this harm was
	unacceptable in the context of the listed building and using this to communicate these
	messages at appeal for the Inspector to have better or stronger appreciation of. In
	addition, this diagrammatic mapping approach could have been used to guide
	communications with Historic England to gain comments on the application.
Key Findings:	 Significance was not understood or explored particularly well by applicant Conservation Officer understood significance of asset's location within and surrounded by rural context Planning Inspector overly reliant on screening and importance of facades rather than design and location choice being a rural country house

Proposal Name:	Disused Airfield, Access Roads, Lissett, East Riding of Yorkshire
Application / Appeal	2 applications:
Number:	06/05618/STPLFE – Approved 17/07/2007
	13/03625/STPLFE/STRAT – Refused Application 06/08/2015
Proposal Description:	2007 Application: Erection of a 12 turbine windfarm, permanent 80m
	anemometer mast, control building and parking area
	Granted consent by East Riding of Yorkshire Council
	2013 Application: Erection of 5 additional wind turbines with associated
	transformers, hard-standings, sub-station compound, cable run and access track.
Heritage Assets	Grade I Listed (& Scheduled Ancient Monument) Burton Agnes Hall
Considered:	(including gatehouse with walls and sets of gate piers adjoining to front) &
	garden statues/features, Grade I Listed Church of St Martin, Burton Agnes,
	Grade II Listed Stables and Coachhouse to Burton Agnes Hall, The Old
	Rectory & Church & Home Farmhouses. Grade II Listed Former Methodist
	Church and Manor Farm Cottage, Burton Agnes.
	Burton Agnes Conservation Area.
	Others listed in ES Churches and nearby farmhouses; Skipsea Castle.
Summary of Supporting	First Application
Documentation:	Planning Application Form Figure 3b shows an aerial photograph of the site in its existing landscape context.
	Planning application form and drawings:
	Summer baseline photographs, wirepoints and photomontages were created
	from select locations, including from the car park immediately south east of
	Burton Agnes Hall. These are provided in the Landscape and Visual Technical
	Appendix of the Environmental Statement.
	Environmental Statement – Technical appendix E – Landscape and Visual:
	The Environmental Statement was supported by figures depicting listed
	buildings and scheduled monuments within a 5km radius of the site om the
	scheme (Fig 12.2.
	Fig 8.4 of the ES shows the ZTV with viewpoints plotted including from some
	heritage assets (e.g. near Burton Agnes Hall & Skipsea Castle).

NB Viewpoint 14 (Figures 8/V-S14a, S14b and S14b) is of particular significance, as it captures the view of most concern to $EH-from\ Burton$ Agnes Hall. The location of the wireframe & photomontages was in front of the Gatehouse however and no consideration was given to views from the entrance / esit of the main house, from within the house or garden itself (where the wind turbines are visible).

Environmental Statement – Technical appendix E – Landscape and Visual. The LVIA assessment for this viewpoint recorded:

Description of Changes:

"Tips and hubs of some of the turbines will be visible above the tree line that forms the backdrop to Burton Agnes village. More turbines will be evident behind bare trees in winter, but the overall form of the development will not be clear. Movement of turbine blades will be evident and some blades will overlap. The turbine blades will generally be back-lit and appear dark against light skies.

Landscape Effects:

The development will not compromise the containment provided by the trees that lie to the south east in the direction of view, nor affect the scale or pattern of the landscape significantly. It will affect the wider landscape setting of the Hall and introduce an incongruous element to a strongly rural landscape. Landscape effects are assessed as medium.

Visual Effects:

The development will present a confusing image, with the interaction of moving blades, backlit by the sun and visible above the tree line. Although it will affect only a small percentage of the view, the wind farm will be noticeable, glimpsed but clearly visible. The visual effects will be medium.

Significance of Effects:

Landscape Effects – major / moderate

Visual Effects - major"

Second Application

Environmental Impact Assessment incorporating an LVIA with photographs of existing views, wireframes & photomontages, together with ZTVs. Figure

8.8 is a photomontage of the view south from a window of the Long Gallery of Burton Agnes Hall.

Viewpoint analysis was conducted from twenty locations. As the proposed development was to be an extension to an existing wind farm the photomontages and wireframes for each view were prepared to illustrate both the proposed development and the existing Lissett Wind Farm. A cumulative wireframe (showing the other existing, consented and application wind farms) that would be visible from this viewpoint was also shown. From 5 of the viewpoints, additional wireframes were prepared to show the likely change that would occur over the 25 year life of the development.

All the visualisations were produced as cylindrical projections and the fold out photomontages should be viewed at 50cm, curved at 90 degrees.

Key Findings about
Setting and
Acceptability:
(supporting
documentation, local
authority, Inspector)

First Application

The applicant's ES chapter on Cultural Heritage noted:

"The group of very high quality buildings at Burton Agnes with the surrounding historic gardens is of high importance and sensitivity. This is reinforced by the role of the estate as an important visitor attraction and cultural destination.

The only conservation area in the study area is at Burton Agnes: this coincides with the designations for the buildings. The overall context of the historic landscape of which the proposals site forms part is assessed as of medium sensitivity."

The ES, Technical Appendices Volume 2 E: Landscape and Visual identified the following:

"The landscape at Burton Agnes provides the setting to a number of buildings and structures of national significance. Although not included on the English Heritage Register of Parks and Gardens, it is a highly distinctive landscape with a strong sense of place, as reflected by the local authority landscape designation. Views from Burton Agnes Hall form an integral part of the design of the park and gardens. The landscape sensitivity is assessed as high."

Chapter 12 'Cultural Heritage' of the ES stated the following: "The estate at Burton Agnes contains the only group of [listed] buildings within the study area of a status that presumes visual dominance and where views are important to its architectural qualities and purpose. The group of the house, the old manor house, gatehouse, church and gardens is enclosed and inward looking. The only point from which the turbines will be visible is the gatehouse at the high point above the village. [There were no comments on views from the house itself – or from the gardens, or the significance of these]. From here the view is south along the line of the road to Gransmoor and Lissett; the proposals site is directly on this alignment within tree blocks (see photomontage viewpoint 14 figure 8/Vw14 in the landscape and visual effects. The effect of the presence of the turbines at a distance of c. 5km on the setting of group at Burton Agnes is minimal given the strength of the architectural qualities, visual priority and self containment of the site. The coherence and dominance is not affected by the change to views. There are no points from which the house and gardens at Burton Agnes and the wind farm are visible together or share a view. Given the tourist and cultural role of the estate at Burton Agnes, attention will be focused on the buildings and gardens themselves. Any views of the turbines in the wider landscape when travelling to or from Burton Agnes are unlikely to affect perceptions of the setting once there (except possibly to reinforce the impression of seclusion and separateness). The small change results in a moderate impact on the group of high importance and sensitivity.

The village of Burton Agnes covered by the conservation area designation and including a number of listed buildings is in a dip below the gatehouse to Burton Agnes. This and the surrounding trees restricts views to the south towards the proposals site. The character of the conservation area is inward looking and dominated by Burton Agnes house. No changes to views that could affect setting are predicted. To the south of the village the group of buildings on the railway on the road to Gransmoor is on a direct sight line to Lissett and the proposals site. The setting of these buildings is clearly defined by the relationship of the group to the railway, and the effect of the visibility of the turbines on their setting is small and a moderate impact is predicted."

Second Application

A 'Further Heritage Statement' was produced in 2013 entitled 'Impact of Proposed Lissett Extension Wind Farm on the Significance of Burton Agnes Hall' produced by Stephen Carter, Headland Archaeology (UK) Ltd as part of application/appeal was submitted to the local planning authority. It stated:

"I have undertaken an assessment of how the significance of Burton Agnes Hall would be affected by the operation of the Lissett Extension Wind Farm alone (with and without the operational Lissett Airfield Wind Farm in the baseline) and cumulatively (in combination with other wind farms).

I have treated Burton Agnes Hall, a Grade I Listed Building and 13 other Listed Buildings associated with it, as a single complex heritage asset. I have concluded that the operation of Lissett Extension alone, with Lissett Airfield in the baseline, would result in an adverse impact of negligible magnitude and significance, insufficient to constitute harm to the significance of the asset.

Without Lissett Airfield in the baseline there would be an adverse impact of slight magnitude, at the lower end of less-than-substantial harm. This effect is of moderate significance.

The cumulative impact of Lisset Extension in combination with three consented wind farms (Carnaby, Fraisthorpe and Lissett) is greater than for Lisset Extension alone but not sufficiently to increase the assessment above slight magnitude and moderate significance. It would be marginally increased again by the addition of one scheme in planning to the cumulative assessment (Bonwick). Again the assessment of magnitude of impact would remain 'slight' and it is considered to be of moderate significance.

These findings are broadly in line with the conclusions reached in the ES although differences in the level of cumulative impact appears to reflect a different approach to cumulative assessment. In any event the impact is of no more than slight magnitude.

My findings are also similar to those of the conservation officer and there is a consensus between these three assessments that there would be less than substantial harm to the significance of Burton Agnes Hall. The acceptability of that harm is a matter for the planning balance (NPPF para.134) and lies outside the scope of assessments by heritage specialists. My own view is that the harm lies at the lower end of 'less-than-substantial' and I do not agree with the comparisons made by the conservation officer between Lissett Extension and the Thornholme Fields appeal decision.

The conclusion reached by Historic England is at odds with the findings of the other three assessors. I consider that its finding of substantial harm to the significance of Burton Agnes Hall is entirely inconsistent with guidance on the meaning of this term and is therefore not credible. I recommend that very

	little weight is given to the advice provided by Historic England on this
	matter.
Stakeholder Views on	First Application
development outcome:	English Heritage (now Historic England) – no documentation regarding
dovelopment outdome.	comments or observations
If not commented, why	
not (where appropriate)?	Conservation Officer
	Objection
	Second Application
	Consultation between various consultants working for the developer and EH
	take place in 2014 to discuss the impact on the Grade I listed Burton Agnes
	Hall and Gatehouse. Various reports produced stating that the impact on the
	significance is not sufficient to warrant the proposal not being approved. EH
	continued with their initial assessment of the second application indicating
	that the proposal would cause unjustified harm to the significance (see their
	final comments below).
	English Heritage's (now Historic England) Final View 03/06/2015
	"Thank you for offering Historic England the opportunity to review the
	additional assessment that has been provided to support
	DC/13/03625/STPLFE/STRAT/ESTEP. 'Impact of the proposed Lissett extension wind farm on the significance of Burton Agnes Hall' 19 May 2015.
	We can confirm that our position remains unaltered. It is our view that the
	wind turbines would cause unjustified harm to the significance of the Grade I
	listed Burton Agnes Hall and the Grade I listed Gatehouse.
	We consider that the level of harm to these heritage assets has been
	underestimated and we stand by our advice as set out in our letter 19
	December 2013.
	With regard to the document provided we have the following observations:
	· It is important to remember that policy and guidance confirms that harm,
	including substantial harm, may arise from development within the setting of
	a heritage asset.
	· We note that Burton Agnes Hall was not visited as part of this new
	assessment.
	• 6.12-6.18 seem to show that our letter has not been understood, as it refers
	to our concern being the impact upon Burton Agnes Hall, not the Gatehouse.

This implies a misunderstanding of our formal advice letter dated 19 December 2013. The consultants have grouped the heritage assets at Burton Agnes together as the 'Burton Agnes Heritage Asset'. We have not used this grouping.

We have considered the contribution setting makes to the significance of each heritage asset affected, as required by para 128 of the NPPF.

- · The assessment takes an approach which considers the 'predicted effects on the cluster of designated heritage assets at Burton Agnes Hall' (1.2) referred to again in 4.1 as 'the combined Burton Agnes Hall heritage asset'. This contrasts with our assessment which focuses on the impact upon the significance of the two Grade I listed buildings, Burton Agnes Hall and Burton Agnes Gatehouse. Broadening the assessment to a notional 'Burton Agnes heritage asset' group dilutes and misrepresents the magnitude of impact and level of harm in this assessment and the Environmental Statement on the two significant Grade I listed buildings that are most affected.
- · 3.4 refers to the 14 listed structures at Burton Agnes Hall 'sharing a common setting'. This is another example of how considering the heritage assets as a group has avoided assessing the contribution that setting makes to the significance of each heritage asset (para 128 of the NPPF). As set out in our advice different elements of the setting of these assets contribute more positively to their significance. Most critically in this case, the intentional designed relationship between the Hall, its Gatehouse and the landscape beyond.
- 4.7-4.11. The description of the Hall picks up some of the key points when assessing the importance of the view towards the Gatehouse. We agree that the principal façade of the Hall faces south and is three storeys high (one more that the other parts of the building), the principal public rooms face south and that the most impressive room is the long gallery. 4.19 notes that the wind turbines are visible from the long gallery, central in this axial view beyond the gatehouse. This direct alignment is an important point which in our view increases the level of harm.
- · 4.19 refers to the view of the Gatehouse from the Hall as 'attractive'. We would say that the significance of this elevation goes beyond being 'attractive' and the aesthetic value of the building which is high and acknowledged as being prominent in views from the external steps leading to the Hall and the elevated windows of the long gallery. There is no acknowledgment in the assessment of the significance of the architectural treatment of the north

- elevation of the Gatehouse (reflected in its Grade I listing) and how it was designed to be seen in the round, as explained in our letter. This has illustrative historical significance in showing how this view was intended to be seen, as well as enhancing the aesthetic value in the sense that it was not just an inferior, rear elevation, its appearance from the long gallery was just as important as when approaching the Hall from the south.
- · 4.24. We agree with the comments that 'the public rooms in the hall, and particular the long gallery, have been designed to provide attractive elevated views out of the building over its gardens and into the countryside beyond, emphasising the dominance of the hall and its owners; these views contribute to the architectural interest of the hall;' We would go one step further and say that this is critical when assessing the impact upon significance in this case. The combination of the long gallery overlooking the Gatehouse and the landscape beyond is key element of the significance of both Grade I listed buildings. This illustrates how the Hall and Gatehouse together are one of the main examples in the country of an ensemble from pivotal historical period in architecture where houses were built as a form of artistic expression for 'show' and turned from inward looking fortified manor houses to outward looking showpieces. A key feature of this change which can be readily appreciated at Burton Agnes is the deliberate orientation to take full advantage of the topography of the site to achieve long distances views from its principal south front which take in the wider landscape.
- · 4.30 refers to the presence of the proposed turbines in 'some views' from the hall. We consider that the views to the south contribute most strongly and positively to the significance of the Hall and the Gatehouse. We agree with the statement in the assessment that this will 'diminish a visitor's experience of the hall and gatehouse as a dominant architectural statement, and intrude into what is currently a coherent ensemble of buildings and gardens, challenging for the visitor's attention'.
- \cdot 4.31. We also agree that this 'effect' on the visitor experience (we would say this is an impact upon significance) is greatest in the view from the long gallery'.
- \cdot 6.3. We support the 'in-combination approach to the assessment of cumulative impact, as opposed to the incremental effect approach in the Environmental Statement.
- \cdot 6.10 fails to understand the particularly strong contribution that the views to the south make to the setting of Burton Agnes Hall and Gatehouse.

- \cdot 6.13. It is important to remember that policy and guidance confirms that harm, including substantial harm, may arise from development within the setting of a heritage asset.
- · 6.13 wrongly assumes that the list entry explains what constitutes fully the special interest of the listed building. List entries are intended to identify the particular building in question and not to be a full description of what is important about them. When assessing a development proposal, the significance of the heritage asset including the contribution setting makes to its significance, needs to be assessed at that particular time (para 128 of the NPPF).
- · 6.14. Significance is attached to all attributes of a place and does not just 'reside in fabric'. Our judgement is that the views from the long gallery make a major contribution to the significance of the heritage assets and how the Hall and Gatehouse are appreciated and experienced.
- · 6.15. We appreciate that there are other listed building associated with Burton Agnes Hall. However the key issue when assessing the impact of this particular scheme is the harm caused to the relationship between the Hall, Gatehouse and wider landscape. We reiterate that the Hall and Gatehouse together are one of the main examples in the country of an ensemble from pivotal historical period in architecture where houses were built as a form of artistic expression for 'show' and turned from inward looking fortified manor houses to outward looking showpieces. A key feature of this change which can be readily appreciated at Burton Agnes is the deliberate orientation to take full advantage of the topography of the site to achieve long distances views which take in the wider landscape. The direct line to the Gatehouse and beyond makes it the most important outward looking view.
- \cdot 6.17-6.18. We fully support what we said at Thornholme about the views to the east. What is critical to understand about the views to the south is that they are more important and therefore the level of harm from this development is greater."

LPA's Decision on Second Application

Planning permission was refused for the following reason(s):

"The proposed development will result in substantial harm to the Burton Agnes Hall complex of designated heritage assets, primarily the Grade I listed Burton Agnes Hall and Burton Agnes Gatehouse. The harm identified to these

designated heritage assets is not considered to be outweighed by the benefits associated with renewable energy development and as such the application is contrary to policy EC5 of the Proposed Modifications Strategy Document March 2015, Policy ENV6 of the Joint Structure Plan for Kingston Upon Hull and the East Riding, Policy EN20 of the Adopted East Yorkshire Borough Wide Local Plan and Paragraphs 132 and 133 of the NPPF. Furthermore the impact of the scheme on Burton Agnes arose as concern from the public consultation process and as such on this issue the scheme has not fully addressed the wider public concerns. Government advice as set out in the NPPG at paragraph 016 states that wind turbines can adversely affect a number of Ministry of Defence operations including radars. The Ministry of Defence have objected to this application on grounds that the turbines will be 23.6km from, detectable by, and will cause unacceptable interference to the air defence radar at Staxton Wold." Site Visit of As Built Not applicable as not built Scheme Summary: (Date, key photos, map) Comparison of As Built Scheme against Predevelopment Information: Summary of Early use of the diagrammatic approach (or similar) would have reinforced the Diagrammatic / Map / need for consideration of assets on an individual basis and highlighted the Alternative approach to need for visualisations from additional locations. Clarity on key aspects of setting: setting and significance would have enabled a better understanding by all parties of the potential issues. Key Findings: Original 12 turbine scheme was not supported by appropriate material to understand impact on setting of key designated assets. The visualisations and supporting material for that application did not strongly relate to heritage issues and professional practice in relation to setting at the time was less developed. This led to consent for a scheme that clearly harmed the setting and significance of the Hall and other designated assets. The later application was subject to considerable engagement with Historic England and the need to address impacts on the setting of assets, on an individual basis, was clearly communicated to the applicant and decisionmaker. EH's continued and firm objection to the scheme and provision of

clear evidence for the impact on setting and significance was instrumental in
the scheme being withdrawn.

Proposal Name:	X1 Tower, Sefton Street, Liverpool
Application / Appeal	
Number:	16f/1016
	Overall development originally given planning permission in 2007
	(06F/1219), but a revised application was submitted and approved in 2016
	for the tower (Block 5) to comprise an additional two storeys.
	, , ,
Proposal Description:	25 storey tower located on the corner of Sefton Street and Parliament Street,
	just on the edge of Liverpool WHS buffer zone.
Heritage Assets	Liverpool Maritime Mercantile City World Heritage Site (incl Pier Head
Considered:	complex, Albert Dock, Anglican Cathedral and Wapping Warehouse) and
	nearby designated heritage assets including Cains Brewery, Grapes Public
	House and Stables.
Summary of Supporting	Planning Statement, Heritage Statement (2016), TVIA, Photomontages,
Documentation:	Elevations and Plans.
	Photomontages and their selected locations were developed in 2007 for the
	original application. Some of these montages were updated with revised
	proposal for the 2016 application, but no montages from new locations were
	created.



Viewpoint Locations



Viewpoint 1



Viewpoint 12

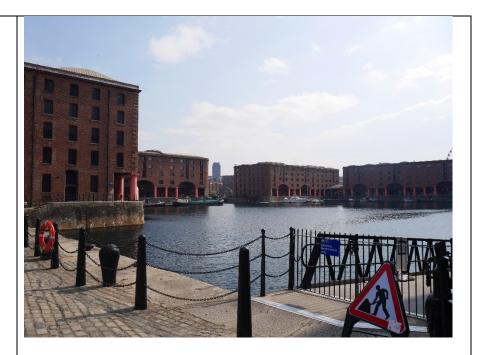


Viewpoint 20

Key Findings about
Setting and Acceptability:
(supporting
documentation, local
authority, Inspector)

Heritage statement outlines findings through identifying significance, impact on that significance. The original assessment uses montages and views developed as part of the TVIA, alongside consultation with Liverpool City Council. This has been updated to include WHS SPD views with the updated assessment information in 2016. A detailed assessment of the WHS, its character and setting alongside changes to its significance have not been fully outlined. Impacts on key views have been assessed (but not the heritage asset(s) themselves), with landmark buildings and changes to those views described.

Viewpoint 12 from Canning Half-Tide Dock describes the proposals as not 'visible above the roofline of the Albert Dock' but there is no element of assessment of sequential views and the potential for the proposal to appear and disappear from view when walking around the Albert Dock. As noted below, the tower is visible above the distinctive roof line of Albert Dock when approaching from the north. Viewpoint 20 from King's Parade the describes the changes as 'would diminish the dominance of the Anglican Cathedral. However, although the view looks across the Queen's Branch Dock, which is of historic interest, it does not include any part of the WHS and is not a key view for understanding he aspects of OUV.' This viewpoint is also reliant on a proposed development (which was consented but not built at the time of assessment) being the dominant aspect in the foreground. This development has not yet been constructed. Stakeholder Views on Documents from stakeholders were not available. development outcome: If not commented, why not (where appropriate)? Site Visit of As Built Site visit was undertaken in October 2018. Key view points were examined Scheme Summary: and the area around the development site was visited. (Date, key photos, map)



Photograph above shows view from within Albert Dock with development masked behind main buildings

Photograph below taken from near viewpoint 12 and shows top two stories of X1 appearing above the roofline of the Albert Dock warehouses — affecting the appreciation of their dominant monumentality



Comparison of As Built Scheme against Predevelopment Information:

Key issue related to views of the development from the north of Albert Dock. Here, sequential views approaching Albert Dock featured X1, although the single chosen static viewpoint (12) in the application did not. The appreciation of Albert Dock in these views is dynamic, it is an approach from the public Pierhead, past the new Liverpool Museum and over the Canning Dock area and river locks towards Albert Dock. These are historically connected spaces and today form one of the key approaches to the Albert Docks. While the selection of VP12 by the applicant is probably fortunate, the lack of sequential viewpoints from further north meant that the visibility of the additional 2 stories was not fully described.

Summary of Diagrammatic / Map / Alternative approach to setting:

Use of Diagrammatic Mapping Technique would have been a useful tool to agree with LCC, applicant and potentially Historic England which assets would need to be reviewed and agree the significances which need to be outlined and how this would alter.

The Diagrammatic Mapping Technique would have been particularly useful to outlining which elements/OUVs of the WHS had the potential to be altered by the proposal.

The Diagrammatic Mapping Technique is unlikely to have been useful to query the locations of suitable viewpoints, and revise these following resubmission of the application in 2016 (based on the 2007 viewpoint locations).

A Zone of Theoretical Visibility would have been useful in determining the focus of assessment, and highlighting the differences between the original 2007 scheme and the revised 2016. This may have opened up discussions on the need to revise and add new locations for photomontages.

Key Findings:

The visualisations i.e. the photomontages were useful in determining the impact at specific static viewpoints, chosen when planning permission was originally applied for in 2007.

Some visualisations were amended when the proposal was revised with an additional two storeys (increase of 7m) in 2016, however not all visualisations were updated. The viewpoints utilised for the 2007 remained the same, with no further additions in 2016 to take account of the additional height, and therefore the increased potential for impact e.g. by overtopping of landmark

buildings or obscuring key views within the WHS. Impacts on heritage assets where sequential views could be a factor are not taken into account using the viewpoints and photomontages chosen.

Whilst the Diagrammatic Mapping Technique would have been useful to allowing a more detailed assessment on the character, OUV and setting of the WHS and the key assets that are critical to the WHS, it would have been unlikely to have identified the need for reviewing viewpoint locations and the addition of new viewpoints. A ZTV would have been a very useful tool for guiding the assessment and understanding the focus of likely impact, and therefore the suitability of viewpoint locations for the heritage assessment.

APPENDIX C - INDUSTRY WORKSHOP

Through the workshop in October 2018 a number of perceived issues were identified, some proposed improvements suggested and potential actions which would remedy issues or improve the current situation.

Perceived Issues:

- Historic environment professionals get involved too late to rethink, or influence visualisations, potentially because views are seen first and foremost as a landscape issue
- Lack of demonstrating significance, describing setting, the thought process regarding choice of visualisation and decision making on acceptability of proposal this often takes place without evidence being demonstrated within application documentation and illustrations
- People are struggling with demonstrating what significance is, concisely and simply, how it relates to setting then illustrating this with suitable visualisations. Not enough thought going into the assessment, then represented weakly by visualisations
- Wasted time and effort on ineffectual visualisations
- Gaps between landscape, townscape, heritage, archaeology and often very asset by asset based assessment rather than looking more holistically at the historic environment

Proposed Improvements:

- Create opportunities for key statutory stakeholders and officers to get involved early in design and application process e.g. agreeing and defining viewpoints, the focus of any assessment, choice of visualisations (both for planning applications and place-making e.g. policy)
- Get narrative right about significance and setting, then support with appropriate, proportional visualisations and show the evidence of this thinking within application material
- Developing and using new techniques to demonstrate change, and helping identify
 the focus early on; remembering more traditional or simplistic techniques that still
 convey the messages to the audience they are intended for, or serve the required
 function
- Really thinking of design as an iterative process, understanding significance >
 influencing design > developing narrative > discussion with decision-makers > and
 illustrating with appropriate visualisations > and using them to enhance design and
 refine discussions i.e. exactly what a Design and Access Statement was designed to
 document

Potential Actions:

• Use of case studies, or further examples within existing guidance which could help illustrate the point, or outline the benefits for e.g. a certain technique, or early involvement, discussion, need for site visits, reminder that visualisations are only a representation and need to be supported by informed narrative

- Potential additional information provided in annex to existing guidance or in technical guidance note series that sits below GPA to discuss visualisation, techniques and case for use
- Outline potential iterative process of understanding asset(s), setting and development of design e.g. through a flowchart, and stressing Design & Access Statement purpose to outlining this.
- Outline possible approaches to establishing settings of heritage assets to enable wider understanding, and importance in explaining this within documentation for technical and non-technical consumers

APPENDIX D - REVIEW OF SETTING STUDIES

There is an increasing trend towards the production of detailed stand-alone setting studies for key sites that may be affected by future change. Whilst some of these setting studies do consider future development in most cases, they generally were prepared to inform management and planning policy, rather than directly supporting or commenting on specific planning applications / development proposals. This appendix reviews and describes a number of these studies as follows:

- Castle Hill, Huddersfield to support development of local plan allocations and future development management decisions.
- Metchley Fort, Birmingham to support development proposals
- National Trust Bickerton Hill, Hughenden & Plas Newydd to guide management of change around the assets
- Angel of the North to support the design of future change and presentation of the site

Castle Hill: A Scheduled Monument and Grade II listed building, located in Kirklees⁸.

A major detailed setting study was undertaken for Kirklees Council that analysed the setting of the asset, the manner in which this contributed to the significance of the asset and the appreciation of that asset's significance. The setting's sensitivity to various forms of development was also assessed. This detailed information will be used by the local authority to underpin its site allocations for employment land and housing, and as an information source when determining applications for large scale developments.

The setting study provides a detailed description of setting including its general situation, identifying key views and historic connections. It goes on to consider the setting's contribution to significance, considering aspects of its surroundings and experience with a summary statement of significance.

This is a detailed narrative following GPA3's recommended approach, with detailed but focussed narrative clearly articulating how the setting contributes to the asset's significance. Crucially, the study is supplemented by a series of graphical depictions of Zones of Theoretical Visibility used to help analyse and determine the setting. Further illustrations show specific aspects of the site's setting such as depicting the site's dominance in the local landscape, prominence in the wider landscape and historical relationships. These depictions work well as they are backed up with a thorough understanding of an asset's setting and the relationship between that setting and significance.

Metchley Fort: A Roman Fort, now scheduled monument in Birmingham.

The asset was formerly a defensive and trading fort along a Roman trading route, the fort is now located within a largely urban landscape and is surrounded by 20th century

_

⁸ http://www.kirklees.gov.uk/beta/planning-policy/pdf/examination/local-evidence/LE63-Castle-Hill-Setting-Study-August-2016.pdf

university and hospital developments. There are some surface earthworks, although these are largely later creations designed to represent the historic form of the fort; the asset's significant fabric is buried below ground.

In response to proposals to relocate University Station, a Network Rail station serving Birmingham University and Hospital, consultants undertook a detailed assessment of the fort's setting and significance in 2018. The assessment provided a current site description and a detailed historic background given the Metchley Fort's archaeological significance. This level of detailed understanding was also needed to ascertain the significance of the site from its topographical position and strategic location, views from and towards the asset and visual prominence.

This study demonstrated that, although the site's principal significances were evidential, and although the site's setting had changed dramatically since the Roman Period, and indeed since the 19th century, there were still elements of the site's setting that contributed to its significance and the appreciation of that significance. This assessment was then used to suggest suitable locations for the relocated University Station, and design solutions that would minimise the harm arising from the station's relocation.

The detailed assessment of the asset's setting and its contribution to significance was highly detailed, describing how on first glance it has an utterly compromised setting but following a more detailed understanding of the site and choice behind its chosen location, the site still derives significance from some aspects of this site's setting.

National Trust Pilot Setting Studies

The setting studies for Hughenden⁹, Bickerton Hill¹⁰ and Plas Nywedd¹¹ were developed as pilot studies for the National Trust's toolkit. They were produced for estates or designed landscapes rather than individual heritage assets and the intention is that these Setting Studies could be completed for all National Trust 'properties', irrespective of whether they contain a heritage asset or not. Therefore, they are intended to be an analysis of how the surroundings contribute to its significance and experience, and be used to guide land use planning or manage change.

The studies differ from some more planning application or development proposal-based setting studies, that consider in detail the impact a specific change will have on the setting and resulting significance of a heritage asset. The National Trust's definition of setting is 'The surroundings that add to the significance and experience of a defined asset'.

This is therefore wider than NPPF definitions and encompasses ecological and landscape than purely the contribution of setting to the significance of a heritage asset.

Though these Setting Studies produced for the National Trust were for slightly differing reasons as the more standard development or planning system-based studies, they still contain a core process of: Understanding Significance using core values relevant to the

⁹ Land Use Consultants, October 2016. 'Hughenden Setting Study - Pilot'

¹⁰ Land Use Consultants, March 2016. 'Bickerton Hill Settings Pilot'

¹¹ Land Use Consultants, February 2015. 'Plas Newydd Settings Pilot'

asset(s), analysing its surroundings and then determining how these contribute to significance. The descriptive narrative and suitability of illustrations make it easy to understand the process and quickly get to grips with how and what aspects of an asset's surroundings are significant (see Figure 1 below).

Understand Significance: incl. Core Values such as historic landscape and buildings, ecological value, community valued green space, landscape character

(Written narrative)

Analyse attributes of surroundings (linked back to core values): e.g. landform and surroundings, sense of arrival, views and visual relationships, functional relationships, recreational experience.

(Written narrative, supported by figures e.g. topographic map, illustrations of historic development, key views, annotated photos, landscape character aps))

Define the Setting: Summarise the aspects of setting which contribute to significance. Includes issues/threats and recommendations for management/monitoring.

(Written narrative identifying and describing geographical based setting zones, supported by figures. Appendices incl. ZTV, Statement of Significance.)

Figure 1: National Trust Setting Studies process of analysis

In the 'Defining the setting' section, the studies move into a more landscape architect-led approach and describe 'setting zones' or areas of 'immediate setting' as geographic parcels. These zones are used for the descriptive narrative, and to identify key threats or management recommendations on a geographical, spatial basis. This zonal approach has some use in relation to land management planning but is of less value when it comes to the understanding different themes or aspects of setting (and their contribution to

significance) as many themes/attributes cross zones or extent beyond them. A zonal approach also runs a risk of the zones being seen as the full extent of setting.

In general terms therefore zonal approaches are best used as part of a management tool rather than as an analytical output to support decision-making.

Angel of the North¹² Significance and Setting Study

The Study was produced by consultants on behalf of Gateshead Borough Council and Historic England in order to understand how the sculpture was appreciated, understand how changes to its surroundings may impact on how it is viewed and identify ways in which it should be protected in the future.

The study outlines a statement of significance organised under a number of different categories, and whilst these don't follow the Historic England's Conservation Principles suggested themes, they are suitable to the asset. They discuss The Angel's significance as post-war public art, a piece of sculpture, regeneration and re-imaging of Gateshead and region, significance to people and significance of the artist.

The study then uses a series of separate themes to describe and analyse the asset's setting (topography, prominence, visibility, communing, amid the ordinary, openness) informed by the Angel's significance.

The Study has an additional section exploring the different ways the sculpture is experienced (Noticing, Travelling by, Visiting) and then explores a range of characteristics of the sculpture in how it is experienced (e.g. experience from a horizontal plane, vertical angle, movement, distance, exposure and exploring).

These characteristics are graded and determine which seminal aspects emphasise key features i.e. are outstanding, versus less stimulating aspects i.e. are interesting, down to aspects which detract from characteristics or relationship with setting i.e. negative. The Study uses a number of examples to then illustrate these characteristics with a discussion and identified sensitivity.

This Study goes through HE's recommended guidance of identifying significance of heritage asset and then how setting contributes to this. It separately identifies experience and how this is characterised as well as scoring those elements to classify those aspects which are the most important and their relative sensitivities in order to help manage change and protect the asset's setting. Having this separate determination of experience works well for The Angel given its prominence as a piece of public art designed to be noticed and be experienced. This may not be so relevant to other types of heritage assets. The use of identifying and scoring key characteristics (largely to do with views as experience) and outlining their sensitivities as a way of managing future change within the asset's setting is useful, but largely based on the potential for the asset to be obscured and so is slightly limited to different types of change.

¹² North of England Civic Trust, January 2018. 'A Study of the Significance which the Angel of the North gains from its Setting'

APPENDIX E - HISTORIC ENGLAND'S DIAGRAMMATIC MAPPING TECHNIQUE

The following section provides an overview of the Diagrammatic Mapping Technique established by a small number of Advisors in Historic England and two case studies illustrating the how this technique has been developed and used.

The technique was developed following on from Historic Environment Local Management training sessions on the subject of understanding the setting of heritage assets. The methodology provides a way of understanding the significance of heritage assets, using HE's Conservation Principles¹³, and understanding the contribution that setting makes to experiencing and appreciating the significance of heritage assets. The technique follows the 5 step approach set out in Historic England's Good Practice Advice Note 3: The Setting of Heritage Assets (GPA3) ¹⁴.

This methodology allows a diagrammatic way of articulating the significance of heritage assets and how setting contributes to this. This technique can then be used to understand the impact on heritage assets (including their setting) arising from proposed developments. It can also be utilised to ensure that schemes are sympathetic to setting issues and make the most of opportunities to better reveal and enhance significance.

As it is a diagrammatic exercise, it is a usable tool to quickly and clearly ascertain the key aspects of significance, how setting contributes to this and how valuable that contribution to significance is. In addition, it can be used to convey these messages to other heritage professionals, local planning authorities and developers.

Whilst it is a rapid analytical tool, as it provides a coherent and lucid narrative of how development proposals may affect heritage assets it is also a communication tool, helping to set the agenda of developments and assessments. The Advisors who have employed this technique general use it to ascertain their own understanding of significance and setting, to inform pre-application consultations, planning applications and appeals.

This technique has been promoted through Historic England's training sessions and outlined in online webinars¹⁵ with one on Setting broadcast in February 2018 with recording available online.

Bolton Abbey - Yorkshire

A planning application was submitted concerning a development proposal to replace four existing wind turbines with three larger turbines. Historic England were not consulted on the original proposal to install wind turbines in this location, nor a secondary application to renew them. Historic England were asked to provide comments on the third application for their replacement.

¹³ https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/

¹⁴ https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/

¹⁵ https://historicengland.org.uk/services-skills/training-skills/online-training/webinars/

Heritage consultants had duly completed a heritage assessment which considered a study area comprising a 5km buffer surrounding the site, which included numerous designated heritage assets. Bolton Abbey was not included as it lay 5.5km from the development site. Bolton Abbey is a highly distinctive landscape which has its roots as a monastic priory that is designated as a large Scheduled Monument, has numerous Grade I, II* and II Listed Buildings including the ruins of the Priory itself and adjacent Church of St Mary and is also designated as a Conservation Area. This are all located within the Yorkshire Dales National Park.

Having been consulted on the planning application, it was critical for Historic England to understand the significance of Bolton Abbey and its designated heritage assets in order to understand the acceptability of the development proposals. The contribution and value of its setting (including the development site) to that significance could then be ascertained, and the impact arising from the proposals understood.

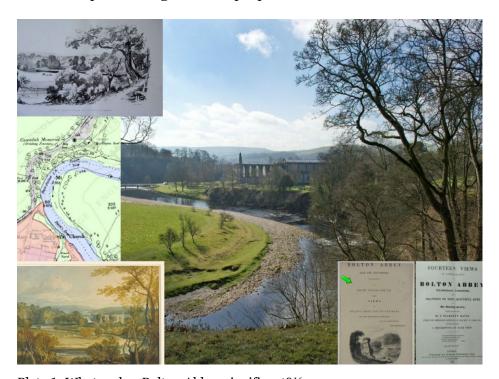


Plate 1: What makes Bolton Abbey significant?¹⁶

Using Historic England's Conservation Principles, the values (Historical, Evidential, Aesthetic & Communal) were used as headings in a diagram (see Plate 2). Using these values as prompts revealed various significances, some of which were previously overlooked or unknown about. One aspect in particular was the contribution of the landscape to the Romantic and Picturesque landscape. Key figures who visited and were inspired by Bolton Abbey include Turner, Wordsworth and Ruskin who described it as a 'wild Northern land' with 'distinctive charm'. In addition, a path network was laid out and written about in a guidebook from the 1820s by Davies which describes the views and in particular view of the ruins, river and dramatic hill summit in the background as 'most

 $\underline{https://historicengland.adobeconnect.com/pqbi3xfp28lg/?launcher=false\&fcsContent=true\&pbMode=normal$

¹⁶

perfect' (a view towards the location of the proposed development site where turbines would be located).

Using the values set out in Conservation Principles, and mapping out these significances in a diagrammatic way revealed graphically where much of the significance is derived.

Plate 3 shows broadly which elements of significance were identified, under the four values. This stage of the diagrammatic mapping technique broadly aligns with the first part of Step 2 in the GPA3.

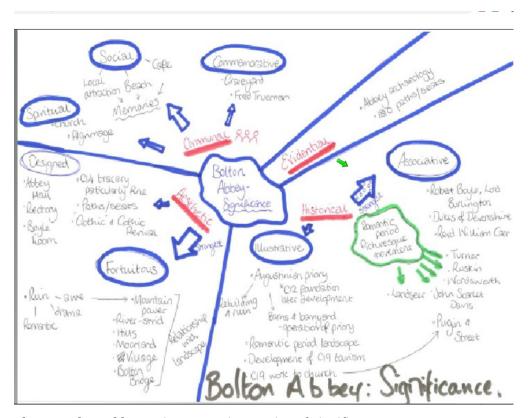


Plate 2: Bolton Abbey - Diagrammatic mapping of Significance

The next step was to understand what aspects of setting make a contribution, and how critical this contribution is, to the significance of the heritage asset. HE looked at how elements of a place illustrate its setting and understand how these elements link to significance. From then, it is possible to determine what level of contribution these elements make (see Plate 3). The importance/level of contribution was considered from 'critical' i.e. this was a fundamental element to how a heritage asset is experiences and our understanding and appreciation of its significance, though to 'contributes to', 'part of' down to 'neutral'. Negative/Detrimental elements were also noted.

This can be seen in the coloured numbered arrows with importance as follows:

- 1 (green)' recording 'critical',
- 2 (blue) recording 'contributes',
- 3 (red) 'part of',
- 4 (black) 'neutral'

- 5 (thick black) 'negative / detrimental'

Again, this was done diagrammatically to clearly articulate the elements of setting identified and how much they contribute to significance identified previously.

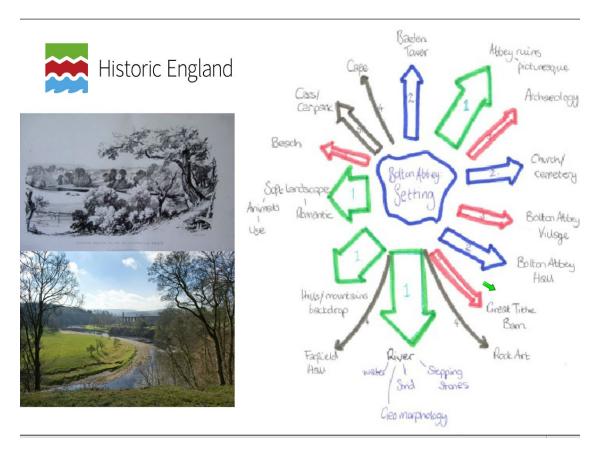


Plate 3: Bolton Abbey – elements of setting which contribute to significance (and value

In the case of Bolton Abbey, the elements of setting which were identified as of 'critical' importance to understanding the significance of Bolton Abbey included the river, hills and mountain backdrop, Romantic and Picturesque landscape. One of the views described by Davies in the 1820s was described as the 'most perfect'. This was identified through the Diagrammatic Mapping Technique to be critical to understanding and appreciating the significance of Bolton Abbey and the designated heritage assets which make up this landscape. This is the view which would be altered by the presence of wind turbines on the summit of the mountain backdrop. As a result Historic England felt that the significance of Bolton Abbey would be harmed and provided consultation comments to the local planning authority to that affect. The application was in the end withdrawn.

This case study is a useful exploration into how the Diagrammatic Mapping Technique was developed and then used. It identified how an under-recognised element of significance, which was embodied in the surrounding setting and the hillside backdrop could be harmed by proposals which had not considered the impact in supporting planning documentation. It fosters a step-by-step approach which enables an understanding of significance in its fullest extent, and then identifies how elements (surroundings, views, context) of a place contribute to that significance. The effect arising from proposals can then be understood and conveyed more coherently and consistently.

Hatfield Colliery

Hatfield Colliery Headstocks is also a case study of how the Diagrammatic Mapping Technique was utilised to understanding significance and how setting contributes to this. However, it was also an exercise in how to identify the acceptability of proposals, but also opportunities for better design.

An application to list the colliery headstocks was received shortly after the colliery closed in June 2015, whilst plans were drawn up for their demolition. This was due to perceived health & safety risks but also the desire to redevelop the site for either housing or for business / industrial use. The headstocks were subsequently Grade II listed ¹⁷.



Plate 4: Hatfield Colliery Headstocks 1 & 2

The Diagrammatic Mapping Technique was undertaken for Hatfield Colliery headstocks as for Bolton Abbey, using a rapid analysis to identify significance under Conservation Principles values (see Plate 5). This identified that there were strong historical and some aesthetic elements of significance, but the overwhelming aspects of significance came under the Communal value banner. Key aspects included its prominence in the local area as a result of functional need, rather than designed prominence, regional identity, wayfinding and symbolic identify as well as its surviving evidence of technological advancement.

¹⁷ https://historicengland.org.uk/listing/the-list/list-entry/1430590

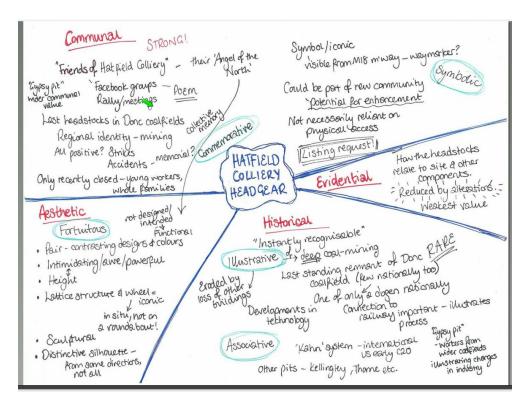


Plate 5: Significance of Hatfield Colliery headstocks

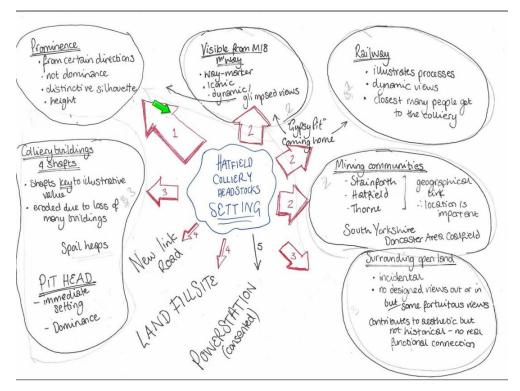


Plate 6:

The next step was to understand the setting of the headstocks (Plate 6). This analysis identified elements such as its prominence due to its distinctive silhouette and height, its visibility from M18 and the railway and so it acts as a way-marker and symbolises the place and links to the South Yorkshire coalfield and the local settlements.

Having undertaken this exercise, it was clear that the most important aspects were of communal significance and the creation of a sense of place and distinctiveness as well as prominence in the local area. Therefore, as long as development proposals respected aspect of the asset's significance, this then this should be acceptable. In fact, the ability to understand this heritage asset as providing a distinctive identify in the local area, there was the potential for it to be used in the future as a design feature and potentially reveal some lost elements of significance.

So in this instance, this was a very rapid exercise given the timing of redevelopment proposals. It enabled Historic England to quickly get to the crux of what made this asset significant. Then understand how its setting contributed to this, and whether future development would be harmful or could create opportunities for enhancing or revealing significance.

APPENDIX F - REVIEW OF VISUALISATION TECHNIQUES

Introduction to Visualisation Techniques

The provision of visualisations to support an application for development is often driven by LVIA practitioners and architects to support their need, or by direct requests from curatorial bodies, 3rd parties or planning authorities. These visualisations are then used to explore the impact of development on the visual setting of an asset, whether the visualisation was created specifically for this purpose, or more likely not.

The techniques of visualisation have been developing apace and what were previously niche, time-consuming and therefore costly methods are now becoming more commonplace. Balancing that, however, is the need to avoid unnecessary costs for developers and make visualisation more relevant and helpful to decision-makers.

Whilst there is no prescribed approach to using visualisations for heritage analysis, there is clear guidance in the appendix to the Landscape Institute Technical Guidance Note¹⁸ on Visual Representation of Development Proposals, which lists 12 visualisation methods in a hierarchy of increasingly complexity and cost:

- Plans, sections, elevations;
- Indicative sketch:
- Annotated photograph;
- Models:
- Computer generated 'wireline' images;
- Augmented reality;
- Constructed perspective sketch;
- Photo wire;
- Photomontage;
- 2D exported images from 3D model;
- Verifiable photomontage;
- 2D exported images linked to photomontages of verifiable 3D models

With increasing cost comes the responsibility on heritage practitioners to understand the types of visualisations which are suitable for varying stages of analysis and assessment and also for supporting various types of proposals or developments. The more effectively that visualisations can be commissioned, and used to provide the necessary evidence of impact, the lower the cost to the developer and the more reasonable and suitable will be the request. In addition, the ability for heritage practitioners and decision-makers to make clear and reasoned judgements will be enhanced by using suitable, appropriate and well thought out visualisations to accompany narrative-based supporting documents.

 $^{18\} https://www.landscape institute.org/wp-content/uploads/2016/01/02-17-Visual-Representation.pdf$

The increasing responsibility on heritage practitioners to understand visualisations, the techniques, timing of when they could be applied and how they could influence proposals and assessment of impacts has led to questions on whether lessons could be learnt from past usage of visualisations used in heritage assessments.

TECHNOLOGY REVIEW

The section below identifies the current approaches to visualisation drawing on the Landscape Institute lists. We have also identified emerging technologies such as Virtual Reality, Augmented Reality and the move towards city models held by local authorities. This is information is presented below in tabular form highlighting their pros and cons and potential applicability as part of the process of visualising impacts on the setting of heritage assets.

In June 2018 the Landscape Institute circulated a draft update for 'Photography and Visualisations in Landscape and Visual Impact Assessment 01/11'.

Between 2010 and 2017 The Highland Council 'Visualisation Standards for Wind Energy Developments' and the Scottish Natural Heritage 'Visual Representation of Windfarms Guidance' have been pushing the boundaries for the visualisation of windfarm developments.

Many local authorities across the UK (and overseas) have adopted the Highland Council Standards in preference to the Landscape Institute Advice Note.

A draft Landscape Institute Advice Note was produced in 2018 but a final has yet to be published. This note aims at ensuring developers, local authority planners, politicians, statutory consultees and the public have a comprehensive set of visualisation guidance to use.

The updated Advice Note is very clear on the camera equipment to be used, the set-up of the equipment, the accuracy of the camera positioning, the 3D model-photograph remapping, and the required size of the printed image. Additionally, work has been separately undertaken at looking at the use of acetates in the presentation of visualisations.

It is expected that the draft Advice Note produced in 2018 is used by all Landscape Practitioners, Architects, Planners, Natural England, Historic England and all stakeholders in ensuring the high degree of accuracy of visualisations in the planning system. Part of this requires that all visualisations are accompanied by a Technical Methodology.

In 2017 the Landscape Institute published 'Visual representation of development proposals (Technical Guidance Note 02/17)'. This document included a number of options for visual representation. These are set out below with information on the advantages and disadvantages of these techniques in terms of supporting the analysis or assessing impact on the setting of heritage assets. There is also commentary on how the technique could be usefully applied.

Table 1: Comparison of Visualisation Techniques

Visualisation / Technology	Pros	Cons	Useful Application
Plans, sections, elevations	Simple. Inexpensive to produce. Forms of the great majority of standard planning applications so not specialist skills or technology.	Difficult to use to analyse impacts, needs to be supported by narrative. Doesn't provide wider context e.g. context. Too simplistic for larger scale developments as stand-alone visualisations.	Simple planning applications, small scale developments, in a combination with other visualisation techniques for more complex applications.
Indicative Sketches	These are simple to prepare. They portray the general design of a proposal. Can be used to demonstrate consideration of influencing features within the context of the proposal.	Do not contribute to understanding of impact of the proposals in terms of heritage assets and views as it doesn't provide wider context.	Useful where a simple level of illustration is required, to understand basic design principles including form, scale and key features of the proposal.
Annotated photograph	Provides an understanding of the proposed location of a development in relation to existing features experienced in views from a particular location. Aids initial location and design decisions.	Professionally subjective in terms of choice of location of where the photograph is taken from.	Useful as a starting point, perhaps at the beginning of an application when the design is not agreed. Useful for considering a preferred location for example. Giving an idea of the scale, massing and rough location. Could be sufficient on its own, or be used to develop more detailed photomontages.
Digital Models	Generally quite simple to prepare. Give an understanding of scale and form of a proposal. Can be used at a basic level within a photograph.	Can lead to inaccuracies if used for photomontages. Limited application.	Can be used to illustrate scale and massing of a proposed development within its setting, at varying levels of detail. Increasingly used by local authorities as a planning tool to 'test' new development proposals against. Examples include VU.CITY where accurate models are produced of Manchester, London, Birmingham, Belfast, Brighton. Many local

			authorities are adopting this approach to 3D modelling to inform planning policy and test development proposals. ¹⁹
Computed generated 'wireline' image	Allows an understanding of context. Relatively accurate as based upon DTM data. Can help to understand what, of the development, would/wouldn't be visible in different circumstances i.e. with/without mitigation.	Requires a 3D model so can be time-consuming and relies on accurate input of development data. Can be difficult to position accurately depending on level of data available e.g. in flat landscape.	Useful aid for decision-making as enable comparison of the position of the proposed development with the existing view.
Augmented Reality (AR)	Improves ability to communicate all levels of a design, in 3D. Represents a development in realtime and making a scheme interactive. Could be used to communicate how a development would impact upon a landscape, for example wind farms.	Requires some specialist training, although is becoming more accessible through advances in technology. Too much detail for smaller scale developments. More suited to marketing a proposal.	In particularly complex/sensitive studies where an immersive experience is beneficial. Provides an experience of the vision for a project and helps to communicate principles and details of the design.
Virtual Reality (VR)	Useful for public engagement. Allows visualisation and experience of how a project might feel like in the future. User friendly.	Not necessarily very realistic or accurate and requires specialist work. Best suited to public realm spaces.	Helps to support a project, particularly considering movement through a space. Understand how new and existing spaces/buildings would be experienced alongside each other.
Constructed perspective sketch	Conveys general design of the proposal. Some level of accuracy as based upon a 3D model/wireline so communicates form, scale and mass.	Requires some specialist work. Limited contribution to considering impact of the proposal.	Useful in progressing design work, for considering the relationship of the proposal and features with existing context.
Photo wire	An accurate illustration of where a proposal would be located in its wider context, using wireframes to indicate development	Requires specialist work for use of 3D modelling software and verified photography.	Provides understanding of how a development may be visible within/impact upon a specific view. Also can be used to demonstrate that a

¹⁹ https://placetech.net/analysis/3d-modelling-isnt-the-future-but-its-a-step-in-the-right-direction/

	proposals. A step up in technical accuracy from annotated photographs.		proposal would not be visible (i.e. confirm it would be hidden) from a particular location.
Photomontage (including verifiable)	Provides rendered version of the photo wire, to enable understanding of how particular design/materials might be experienced from a particular location.	Not a substitute to visiting a viewpoint in the field. Rendering may enhance how the proposals is seen in a view. Can be some inaccuracies with overlaying. Verified requires specialist work, to give higher level of accuracy.	Illustrate the likely view of a proposed development as it would be seen in a photograph. Provide an aid for assessment.
2D exported images from 3D model (potentially linked to photomontages)	High levels of accuracy and detail, for use with photomontages.	Limited contribution to understanding how a proposal would impact in terms of heritage assets and views. Requires specialist work.	Provides understanding of development detail.
Zone of Theoretical Influence* *Not technically a visualisation technique identified LI Technical Note, but often used to inform analysis and support planning applications involving heritage assets.	Provides initial understanding of where a proposed development would be visible from. Can provide an idea of cumulative visual effect without being labour intensive. Can model using a range of factors e.g. visibility from multiple turbines, visibility from ranging heights, inter- visibility, options of bare earth modelling (DSM) or visual barrier ZTVs which include obstructions.	Assumptions need to be made, which limit the application of the ZTV. This requires a level of specialist work, although relatively simple programmes are available. Be aware this is very 'theoretical' and onsite work is needed to verify. Inclusion of obstructions is subjective. Informing assessment at the early stages, less useful at later stages.	Large scale developments which may have long range impacts e.g. windfarms, tall buildings. Useful in determining focus of assessment (direction, extent of search areas, heritage assets).

In summary, there are a variety of techniques, which are useful to differing applications and at differing stages of the assessment process. A number are not particularly complex nor expensive and becoming relatively routine but can be very useful in helping to gauge impact or demonstrate acceptability. The key is to understanding what technique is being used to inform/support and to have well considered heritage-based analysis or findings which are illustrated rather than relying on more generically produced illustrations informing the overall application or other disciplines such as landscape or engineering considerations.

APPENDIX G - POLICY, GUIDANCE AND LEGISLATION

The following was used and reviewed in producing this study:

- Planning (Listed Buildings and Conservation Areas) Act, 1990²⁰
- Planning Practice Guide, Conserving and Enhancing the Historic Environment²¹
- National Planning Policy Framework (NPPF), 2019²²
- Historic England's Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) The Setting of Heritage Assets, 2017²³
- Historic England's Conservation Principles, Policies and Guidance, 2008²⁴
- Chartered Institute for Archaeologists Standard and Guidance for Historic Environment Desk-based Assessment²⁵
- Guidelines for Landscape and Visual Impact Assessment²⁶

²⁰ https://www.legislation.gov.uk/ukpga/1990/9/contents

²¹ https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment

²² https://www.gov.uk/government/collections/revised-national-planning-policy-framework

²³ https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/

²⁴ https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/

 $^{25\} https://www.archaeologists.net/sites/default/files/CIfAS\%26GDBA_3.pdf$

²⁶ Landscape Institute, IEMA. 'Guidelines for Landscape and Visual Impact Assessment'. 2013













Historic England Research and the Historic Environment

We are the public body that looks after England's historic environment. We champion historic places, helping people understand, value and care for them.

A good understanding of the historic environment is fundamental to ensuring people appreciate and enjoy their heritage and provides the essential first step towards its effective protection.

Historic England works to improve care, understanding and public enjoyment of the historic environment. We undertake and sponsor authoritative research. We develop new approaches to interpreting and protecting heritage and provide high quality expert advice and training.

We make the results of our work available through the Historic England Research Report Series, and through journal publications and monographs. Our online magazine Historic England Research which appears twice a year, aims to keep our partners within and outside Historic England up-to-date with our projects and activities.

A full list of Research Reports, with abstracts and information on how to obtain copies, may be found on www.HistoricEngland.org.uk/researchreports

Some of these reports are interim reports, making the results of specialist investigations available in advance of full publication. They are not usually subject to external refereeing, and their conclusions may sometimes have to be modified in the light of information not available at the time of the investigation.

Where no final project report is available, you should consult the author before citing these reports in any publication. Opinions expressed in these reports are those of the author(s) and are not necessarily those of Historic England.

The Research Report Series incorporates reports by the expert teams within the Research Group of Historic England, alongside contributions from other parts of the organisation. It replaces the former Centre for Archaeology Reports Series, the Archaeological Investigation Report Series, the Architectural Investigation Report Series, and the Research Department Report Series