



Technical Appendix 3: Cultural Heritage Impact Assessment

Derril Water Solar Farm

01/03/2021



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EXECUTIVE SUMMARY

- 3.1. A Cultural Heritage Impact Assessment has been produced to evaluate the potential impacts of the Proposed Development upon cultural heritage assets and archaeological remains within and around the Application Site. The assessment has been undertaken in advance of a proposed solar farm development on lands circa 1.2km southwest of the village of Pyworthy, Devon.
- 3.2. A search of high-grade heritage assets such as World Heritage Sites, Scheduled Monuments, Parks and Gardens of Special Historic Interest, Historic Battlefields and Heritage Coasts has been carried out within a 5km study zone of the Proposed Development, while Listed Buildings and Conservation Areas have been assessed within a 2km study zone. Non-designated archaeology and heritage sites within the local Historic Environment Record have also been assessed within a 1km study zone. Baseline information was also obtained through a site walkover survey, map regression analysis, placenames analysis, aerial photography and consultation with relevant records and databases.
- 3.3. As no designated or non-designated heritage assets are present within the Application Site, no direct effects are anticipated upon recorded heritage assets. As such, no specific mitigation measures are required in relation to these resources and so **no residual direct effects** are anticipated upon recorded heritage assets.
- 3.4. The potential for the Proposed Development to impact upon medieval and post-medieval agricultural remains is considered to be **Moderate to low**, with such remains likely to be of **Low/Local** importance, while the potential for the Proposed Development to impact upon prehistoric remains is considered to be **Low**, but with such remains likely to be of potentially **High** significance. This archaeological potential is considered to be applicable to all fields within the Application Site due to it being located within a landscape of prehistoric bowl barrows, as well as its relative lack of significant ground disturbance. Following the implementation of an appropriate archaeological programme of works as outlined within this report, measures will be in place for further investigation of the archaeological potential of the Application Site, as well as for the full recording or preservation of any sub-surface remains of significance that are identified within the Application Site. Assuming this is implemented, **residual direct effects upon sub-surface archaeological remains are estimated to be Low**.
- 3.5. Indirect effects upon the surrounding heritage assets have been assessed as **Low** in the worst-case. Therefore, no specific mitigation is considered to be required for the reduction of any visual impacts and residual indirect effects will therefore also be **Low** in the worst-case.

INTRODUCTION

- 3.6. Neo Environmental Ltd has been appointed by Renewable Energy Systems (RES) Ltd (the “Applicant”) to complete a Cultural Heritage Impact Assessment (CHIA) for a proposed 42MW solar farm and associated infrastructure (the “Proposed Development”) on lands circa 1.2km southwest of the village of Pyworthy, Devon (the “Application Site”).
- 3.7. Please see **Figure 4 of Volume 2: Planning Application Drawings** for the layout of the Proposed Development.

Development Description

- 3.8. The Proposed Development will consist of the construction of bi-facial solar photovoltaic (PV) panels mounted on metal frames, new access tracks, underground cabling, perimeter fencing with CCTV cameras and access gates, a temporary construction compound, substation and all ancillary grid infrastructure and associated works.
- 3.9. The Proposed Development will result in the production of clean energy from a renewable energy resource (daylight) and will also involve additional landscaping including hedgerow planting and improved biodiversity management.

Site Description

- 3.10. The Application Site is located on lands circa 1.2km southwest of the village of Pyworthy and c. 1.8km southeast of Bridgerule in Torridge, Devon; the approximate centre point of which is Grid Reference E229936, N101914. Comprising 28 agricultural fields, the Application Site measures 66.33 hectares (ha) in total. See **Figure 1 of Volume 2: Planning Application Drawings** for details.
- 3.11. Land within the Application Site itself is gently undulating, ranging between 95 - 125m AOD and consists of fields typically of medium scale and generally well enclosed by a mixture of dense treelines, hedgerows and woodland shelter belt, limiting visibility for local settlements and receptors (See **Figure 3 of Volume 2: Planning Application Drawings** for field numbers).
- 3.12. The Application Site is in an area with existing electricity infrastructure, with a solar farm present c. 0.3km southeast and another c. 1.2km to the southwest. Additionally, the electrical Pyworthy Substation is located c. 75m from the northern parcel’s eastern boundary, adjacent to Field 16, where the Proposed Development will connect.
- 3.13. The local area is generally agricultural in nature, punctuated by individual properties and farmsteads; the nearest residential areas are Hopworthy and Yeomadon, located 0.7km northeast and southeast respectively. Recreational Routes include two Public Rights of Way (PRoW); one which passes the southeastern boundary of the Application Site (linking

Crinacott Farm and Northmoor Farm, both outside the Application Site) and another which passes east of the adjacent substation.

- 3.14. While there are a number of drains and water courses throughout the Application Site, it is mostly contained within Flood Zone 1, an area described as having a “Low probability” of flooding. The exception to this is a small part of the Application Site within Flood Zone 2 and 3, towards the eastern boundary of Field 16. These areas have been avoided within the Proposed Development footprint.
- 3.15. The Application Site will be accessed from four existing entrance points on the unnamed minor road which splits the site into northern and southern parcels. From the western boundary of the site, the road runs in a southwestern direction for c. 0.5km before turning in a general east-northeast direction through the eastern section of the Application Site.

Scope of the Assessment

- 3.16. The assessment has been produced to evaluate the cultural heritage assets and archaeological remains relevant to the Application Site. A search of high-grade designated heritage assets such as Scheduled Monuments, World Heritage Sites, Registered Parks and Gardens of Special Historic Interest (PGSHI), Registered Battlefields and Heritage Coasts has been carried out within a 5km study zone of the Proposed Development, in line with previous similar assessments of solar farms produced by Neo Environmental. This study zone allows assets of national significance to be appropriately considered for indirect impacts, both on the assets themselves and their settings.
- 3.17. Architectural heritage assets such as Listed Buildings and Conservation Areas have been assessed within a 2km study zone. This study zone is also in line with previous solar farm assessments produced by Neo Environmental. It is considered to be appropriate for assets of regional and local significance. These features are potentially sensitive to visual impacts but not to the same extent as those of national significance.
- 3.18. Non-designated archaeology and heritage sites within the local Historic Environment Record have been assessed within a 1km study zone. These sites are usually of a lower sensitivity to visual impacts but both features and events within the record can be a good indication of the likely archaeological potential of land within the Application Site.
- 3.19. Where appropriate, sites of exceptional value or sensitivity outside the study zones have also been assessed. The aims of the assessment are as follows:
- To identify all known heritage assets within the study zone based on all available public resources;
 - To identify the archaeological potential of the Application Site;
 - To determine what if any level of recording will be required for any extant remains;

- To assess the significance of any direct or indirect effect of the Proposed Development on cultural heritage assets and their settings and potential archaeological remains within the study zone, from construction through to decommissioning;
- To identify mitigation measures where possible and aid in the design process to reduce the potential impacts of the proposed scheme;
- To provide recommendations for any further archaeological/heritage assessment work that should be undertaken as part of the Proposed Development.

3.20. The report is supported by the following Figures and Technical Appendices:

- Appendix 3A: Figures
 - Figure 3.1 – Designated Heritage Assets
 - Figure 3.2 – Historic Environment Record
 - Figure 3.3 – 1884 OS Historic Map
 - Figure 3.4 – 1907 OS Historic Map
- Appendix 3B: Tables
- Appendix 3C: Plates

Statement of Authority

- 3.21. The assessment has been conducted by registered archaeologists with the Chartered Institute for Archaeologists (CIfA), of Associate (ACIfA) level or above and/or members of the Institute of Archaeologists of Ireland (IAI). The assessment has been conducted in accordance with the appropriate professional guidelines outlined in the relevant Codes of Conduct and other guidance documents from both CIfA and AIA.
- 3.22. Michael Briggs BSc (Hons) MSc ACIfA MIAI was the primary author of this assessment. He has undertaken a large number of cultural heritage and archaeological impact assessments for developments across the UK and Ireland, with a particular focus on renewable projects, including numerous solar farms throughout the Republic of Ireland and Northern Ireland. He has over five years of experience, including assessments for the initial stages of feasibility and heritage impacts through to any final mitigation measures required for each site, such as geophysical surveys and trial trenching.
- 3.23. Paul Neary BA H.Dip MA MSc MEnvSc MIAI ACIFA CEnv was the primary editor of this report. Paul is dual-qualified as a Chartered Environmentalist and archaeologist. Paul has over 14 years of archaeology and heritage experience, the majority of which relates to Ireland. Paul

has worked on large road projects, EIA developments and energy projects across Ireland and the UK. He is licensed to direct archaeology work in the Republic of Ireland and has also held archaeology director licenses in Northern Ireland.

Consultation

- 3.24. Pre-application discussions on the 22nd October 2020 acknowledged the lack of designated heritage assets inside the site and the lack of any specific indicators for archaeological in the site. However, it was noted that there may be potential for prehistoric remains due to the number of bowl barrows identified in the surrounding area. Geophysical survey and trial trenching were recommended for the site in order to evaluate its archaeological potential. This was further emphasised by subsequent consultation with Steve Reed, the council archaeologist.
- 3.25. Within the formal pre-application response on the 10th November 2020, the Council Conservation Officer had no specific objections, noting that heritage assets are largely well set into the landscape or within settlements themselves, while the temporary nature of the proposal will result in only a short-term intrusion into the landscape.
- 3.26. Historic England was consulted regarding potential visual impacts upon scheduled monuments (bowl barrows) within the surrounding landscape. A response was received on 9th December 2020 but no particular concerns were raised.
- 3.27. Consultation with Laura Davies, the Principal Planning Officer, on 19th January, confirmed that the submission of a cultural heritage impact assessment and walkover survey of the site is likely to be sufficient to consider the planning application initially, but that further work (such as the geophysical survey and trial trenching mentioned) is likely to be required as part of a written scheme of investigation done as a pre-commencement condition.

LEGISLATION AND PLANNING POLICY CONTEXT

3.28. This Cultural Heritage Impact Assessment has been considered with regard to all relevant national, regional and local planning policy and guidance:

- National Planning Policy Framework 2012, paragraphs 128, 132, 134, 135 and 139¹;
- The Town and Country Planning (Environmental Impact Assessment) Regulations 2011, Schedule 4, Part 1²;
- Ancient Monuments and Archaeological Areas Act 1979 (as amended)³;
- Historic England: The Setting of Heritage Assets: a guidance document 2011⁴;
- Historic England's Historic Environment Good Practice Advice in Planning: Note 3 (2015)⁵;
- Historic England's Statement of Heritage Significance: Analysing Significance in Heritage Assets. Historic England Advice Note 12 (2019)⁶;
- National Heritage Act 1983 (amended 2002)⁷;
- Planning (Listed Buildings and Conservation Areas) Act 1990⁸;
- Hedgerows Regulations 1997: Schedule 1 – Additional Criteria for Determining “Important” Hedgerows⁹;

¹ Department for Communities and Local Government (2012) *National Planning Policy Framework*. HM Government, London

² HM Government (2011) *The Town and Country Planning (Environmental Impact Assessment) Regulations*. HM Government, London.

³ HM Government (1979) *Ancient Monuments and Archaeological Areas Act*. HM Government, London.

⁴ Historic England (2011) *The Setting of Heritage Assets*. Historic England.

⁵ Historic England (2015) *Historic Environment Good Practice Advice in Planning: Note 3*. Historic England.

⁶ Historic England (2019) *Statement of Heritage Significance: Analysing Significance in Heritage Assets*. Historic England Advice Note 12. Historic England.

⁷ HM Government (1983) *National Heritage Act (Amended 2002)*. HM Government, London.

⁸ HM Government (1990) *Planning (Listed Buildings and Conservation Areas) Act*. HM Government, London.

⁹ HM Government (1997) *The Hedgerows Regulations*. HM Government, London.

- North Devon and Torridge Local Plan 2011 – 2031¹⁰.

3.29. The most relevant policy documents to this impact assessment are discussed in more detail below.

National Planning Policy Framework (NPPF) 2012

- 3.30. In March 2012, the Government published the National Planning Policy Framework (NPPF), which superseded Planning Policy Statement 5: Planning for the Historic Environment (PPS5) as Government Policy on the management of change to the historic environment in England.
- 3.31. Paragraph 17 of the NPPF sets out the core planning principles which should underpin plan-making and decision taking. Bullet 10 determines that planning should *“conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations”*.
- 3.32. The overarching policy and guidance for the conservation and enhancement of the historic environment have been formulated within Chapter 12 of the NPPF and build upon the core planning principle for the appropriate conservation of heritage assets. The framework classifies the historic environment as: *“all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora”* (NPPF, Glossary).
- 3.33. Under this reviewed policy document archaeological sites, buildings, parks and gardens, conservation areas, battlefields or other aspects of the historic environment that have significance because of their historic, archaeological, architectural or artistic interest are considered heritage assets. These heritage assets include both designated sites and non-designated sites identified by the LPA and must be a consideration in the planning process due to their heritage interest.
- 3.34. The golden thread running throughout the NPPF is that: *“Development that is sustainable should go ahead, without delay – a presumption in favour of sustainable development that is the basis for every plan, and every decision.”* Policies outlined in the document consider both the treatment of the assets themselves and their setting in the landscape, which are the primary material considerations for heritage assets involved in the development planning process. The most relevant paragraphs to this project are detailed below.

Paragraph 128

“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their

¹⁰ Torridge District Council & North Devon Council (2018) *North Devon and Torridge Local Plan: 2011 – 2031*. TDC/NDC: Bideford/Barnstaple.

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

- 3.35. The methodology section within this report details the appropriate measures undertaken for the impact assessment that ensure compliance with Paragraph 128.

Paragraph 132

"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a Grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, Grade I and II listed buildings, Grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."*

- 3.36. The significance of any heritage assets potentially affected by the proposed development have been evaluated preceding an assessment of impacts upon both the asset and its setting. This has determined the importance of the asset and whether any impacts upon it can be considered substantial harm.

Paragraph 134

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

Paragraph 135

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

Paragraph 139

“Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.”

- 3.37. This report includes a detailed assessment of both designated and non-designated heritage assets in order to determine their significance and sensitivity to the proposed development. Where non-designated assets are of high significance they will be considered and assessed as equivalent to SAMs.

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)

- 3.38. This document mainly offers guidance and advice regarding consideration of the setting of heritage assets. The guidance was produced by Historic England and is contextualised by NPPF and the related guidance in the National Planning Practice Guide.

- 3.39. There are useful concepts regarding setting illustrated in the document, and it lays out the recommended procedure for assessing the effects a development proposal may have on the surrounding assets and their settings. The document defines setting as the surroundings in which an asset is experienced, and discusses the effects that developments can have on the different types of setting heritage assets have.

“The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, across, or including that asset.” (Paragraph 10)

- 3.40. Therefore this assessment takes into account the setting of all identified heritage assets and determines the impact that the proposed development may have on them. It is understood that views to and from the heritage asset, as well as any meaningful intervisibility that it shares with its surrounding landscape, can constitute significance. Detailed consideration of these views has been undertaken and any relevant impacts, with mitigation measures where appropriate, have been highlighted.

“Settings of heritage assets change over time. Understanding this history of change will help to determine how further development within the asset’s setting is likely to affect the contribution made by setting to the significance of the heritage asset. Settings of heritage assets which closely resemble the setting in which the asset was constructed or formed are likely to contribute to significance but settings which have changed may also themselves enhance significance, for instance where townscape character has been shaped by cycles of change and creation over the long term. Settings may also have suffered negative impact from inappropriate past developments and may be enhanced by the removal of the inappropriate structure(s).” (Paragraph 9)

- 3.41. As part of this assessment, the changes to an asset's setting over time will be considered where appropriate. This will allow the significance of the setting's contribution to the heritage value of an asset to be understood.

“Conserving or enhancing heritage assets by taking their settings into account need not prevent change; indeed change may be positive, for instance where the setting has been compromised by poor development. Many places coincide with the setting of a heritage asset and are subject to some degree of change over time. NPPF policies, together with the guidance on their implementation in the Planning Policy Guidance (PPG), provide the framework for the consideration of change affecting the setting of undesignated and designated heritage assets as part of the decision-taking process.” (Paragraph 18)

- 3.42. Historic England, therefore, are not seeking to ensure that heritage assets do not preclude development and their protection should not prevent change. However, the more important a designated asset the greater the weight should be given to its conservation. This assessment will identify the significance of designated and non-designated heritage assets and apply appropriate weight to the potential impact on them.

Hedgerows Regulations 1997

- 3.43. Part II of Schedule 1 within the Hedgerows Regulations 1997 states the additional criteria for determining “important” hedgerows in an archaeological and historic context. This can be important for a site where hedgerows may require alteration or removal to accommodate the design of a proposal.

“1. The hedgerow marks the boundary, or part of the boundary, of at least one historic parish or township; and for this purpose “historic” means existing before 1850.

2. The hedgerow incorporates an archaeological feature which is-

(a) included in the schedule of monuments compiled by the Secretary of State under section 1 (schedule of monuments) of the Ancient Monuments and Scheduled Areas Act 1979; or

(b) recorded at the relevant date in a sites and Monuments Record.

3. The hedgerow-

(a) is situated wholly or partly within an archaeological site included or recorded as mentioned in paragraph 2 or on land adjacent to and associated with such a site; and

(b) is associated with any monument or feature on that site.

4. The hedgerow-

(a) *marks the boundary of a pre-1600 AD estate or manor recorded at the relevant date in a sites and Monuments Record or on a document held at that date at a Record Office; or*

(b) *is visibly related to any building or feature of such an estate or manor.*

5. *The hedgerow-*

(a) *is recorded in a document held at the relevant date at a Record Office as an integral part of a field system pre-dating the Inclosure acts; or*

(b) *is part of, or visibly related to, any building or other feature associated with such a system, and that system-*

(i) *is substantially complete; or*

(ii) *is of a pattern which is recorded in a document prepared before the relevant date by a local planning authority, within the meaning of the 1990 Act(b), for the purposes of development control within the authority's area, as a key landscape characteristic."*

North Devon and Torrington Local Plan 2011 – 2031, adopted October 2018

3.44. The approach to heritage and archaeology within the planning and development control processes for Torrington Council is largely summarised within the following policies.

Policy ST15: Conserving Heritage Assets

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

(a) conserving the historic dimension of the landscape;

(b) conserving cultural, built, historic and archaeological features of national and local importance and their settings, including those that are not formally designated;

(c) identifying and protecting locally important buildings that contribute to the area's local character and identity; and

(d) increasing opportunities for access, education and appreciation of all aspects of northern Devon's historic environment, for all sections of the community."

Policy DM07: Historic Environment

" (1) All proposals affecting heritage assets should be accompanied by sufficient information, in the form of a Heritage Statement, to enable the impact of the proposal on the significance of the heritage asset and its setting to be properly assessed. As part

of such an assessment, consideration should be given, in order of preference, for avoiding any harm, providing enhancement, then minimising and mitigating any harm.

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

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

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

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

- 3.45. This impact assessment will therefore consider all designated and non-designated heritage assets identified within the above local policy in order to ensure that the Proposed Development does not substantially harm any heritage assets or their settings, and complies with policies set out in both the Local Plan and the NPPF.

ASSESSMENT METHODOLOGY

Desk Based Assessment

- 3.46. The desk-based assessment was conducted to ascertain all historical and archaeological information relevant to the Application Site and the local area. A search of high-grade designated heritage assets such as Scheduled Monuments, World Heritage Sites, Registered Parks and Gardens of Special Historic Interest (PGSHI), Registered Battlefields and Heritage Coasts has been carried out within a 5km study zone of the Proposed Development, while Listed Buildings and Conservation Areas have been assessed within a 2km study zone. Non-designated sites within the local Historic Environment Record (HER) and similar sources have also been identified within a 1km study zone around the proposed development boundary in order to appraise the archaeological potential of land within the Application Site.
- 3.47. The sizes of these study zones were selected to ensure that comprehensive and informative data was collated to characterise the direct and indirect impacts that the Proposed Development may have on historical and archaeological assets within the local area. Due to the nature of the records, some degree of overlap is possible (for example a site that has been recorded within both the HER and as a Listed Building) and some assets may therefore have been repeated. Where appropriate, sites of exceptional value or sensitivity outside the study zones have also been assessed.
- 3.48. Historical databases and various archives were consulted to identify the designated assets and undertake the assessment. These assets were imported into ArcGIS Pro as shapefiles in order to determine their locations relative to the Application Site and produce the figures supporting this assessment. The main sources which were consulted include the:
- The National Heritage List for England (NHLE);
 - The Humber Historic Environment Record (HER);
 - Published sources available in the Humber HER;
 - Register of Parks and Gardens of Special Historic Interest (Historic England);
 - Register of Historic Battlefields (Historic England);
 - GIS shapefiles hosted via UK Government and Local Authority links;
 - Aerial imagery via Google Earth, Bing Maps and ArcGIS Pro global mapping;
 - National Collection of Aerial Photography;
 - Cambridge University Collection of Aerial Photography;

- Britain from Above online Aerial Photography portal¹¹;
- Excavation reports hosted by Archaeology Data Service and OASIS; and
- Historic Maps accessible via the OS and National Library of Scotland.

Map Regression Analysis

- 3.49. Analysis of historic maps can reveal the changes in landuse and field boundaries in the area and can highlight potential areas of archaeological interest that may have been lost in the subsequent years. Relevant maps were consulted to undertake this analysis as part of the desk-based assessment and site walkover survey.

Aerial Photography and Placename Assessments

- 3.50. To identify potential archaeological features within the Application Site that are not recorded within the relevant databases, aerial photography of the land was examined in order to identify any cropmarks or markings within the Application Site that may be indicative of previously unknown features.
- 3.51. Similarly, a placename analysis of the baronies, townlands and parishes containing the land was undertaken as this can often determine the historical landuse associated with the Application Site even when other evidence of this usage has been lost.

Assessment of Direct Impacts

- 3.52. Potential direct impacts during the construction phase are considered as physical disturbance of known or associated archaeological remains. These impacts can be caused through the construction processes within the footprint of the Proposed Development, including ancillary works such as access tracks. Direct impacts can affect both above ground and subsurface remains, which will both be considered within this assessment. The presence and character of any existing archaeological features will be identified within the site boundary, and the archaeological potential of the site assessed through a desk-based assessment of the surrounding archaeological resource and landscape. The significance of any impacts will be determined by considering the construction methodology within the Application Site and to what extent this would disturb any sub-surface remains.

Assessment of Indirect Impacts

- 3.53. The assets that were identified through the sources previously listed were assessed for their significance using the criteria presented in **Table 1: Appendix 3B**. The magnitude of the visual impacts upon these assets was determined by the views and intervisibility shared with the

¹¹ <http://www.britainfromabove.org.uk/>, last accessed 27/01/21

Proposed Development, as well as the nature, character, date, extent, setting and surviving remains of the feature where relevant. Indirect effects are then assigned by on the following scale by considering their significance, sensitivity and magnitude of impact:

- Major
- Major to moderate
- Moderate
- Moderate to low
- Low
- Low to negligible
- Negligible

3.54. Indirect effects of 'moderate' or above are considered to be potentially significant and appropriate mitigation measures have been recommended where appropriate in order to lower the potential impact.

Visual Impact Assessment

3.55. A Zone of Theoretical Visibility (ZTV) was produced to identify sites with a greater potential for being indirectly impacted by the Proposed Development. The ZTV has been overlaid on the heritage assets within the study zones, to identify those that will potentially be visually impacted by the Proposed Development during the operational phase (See **Figures 3.1 and 3.2 of Appendix 3B.**)

3.56. Digital Terrain Modelling sourced from digital height data derived from Ordnance Survey Ireland, with the viewer height set at 2m high was used to calculate the ZTV. The produced ZTV did not account for any elements in the landscape such as trees, hedgerows, walls or buildings that may help screen views, nor account for the influences of the weather upon any views.

The Importance of Setting

3.57. Setting can be important to the way in which historic assets or places are understood, appreciated and experienced.

3.58. Where development is proposed it is important to identify and define the setting of the heritage asset and to assess how development might impact upon this resource. Setting often extends beyond the property boundary, or 'curtilage', of an individual historic asset into a broader landscape context. Less tangible elements can also be important in understanding the setting. These may include function, sensory perceptions or the historical, artistic, literary

and scenic associations of places or landscapes. In the light of this guidance, development proposals should seek to avoid or mitigate detrimental impacts on the settings of historic assets.

Site Visit

- 3.59. A walkover survey was conducted at the Application Site in September 2020. The primary aim of the survey was to identify any potential archaeological or historical features within the Application Site that are not recorded. The land and fields within the Application Site were documented photographically along with any possible features identified. The results of this survey also considered available information on the known designated and non-designated sites within and close to the Application Site.

Assessment Limitations

- 3.60. The consulted sources contain records of known archaeological and historic features. The record is not an exhaustive record of all surviving historic environment features and does not preclude the possible existence of archaeological remains of significance within the study zone, which are at present unknown or have been added to the records recently. It was assumed that official data provided by public bodies was accurate and up-to-date.
- 3.61. Views and effects were carefully assessed, but restrictions due to accessibility because of private land ownership or issues regarding Health and Safety may have limited assessment. However, no significant issues were encountered during the walkover survey.

BASELINE CHARACTERISATION

3.62. The following section outlines the historical and archaeological background within the extent of the study zones and the local area. This provides a clear depiction of the context and significance of the heritage assets that could potentially be impacted by the Proposed Development. The report outlines an assessment of the direct and indirect impacts of the Proposed Development and proposed mitigation measures. The potential for disturbing any remains within the footprint of the Proposed Development has been assessed and recommendations produced for any further investigative work.

Archaeological Period Classifications

3.63. The period classifications below provide chronological context for the archaeological assets which are discussed as part of this report.

- Mesolithic (10,000 – 4000BC)
- Neolithic (4000 - 2500BC)
- Bronze Age (2500 - 700BC)
- Iron Age (700BC – AD43)
- Roman (AD43 – AD410)
- Early Medieval (AD410 - AD1066)
- Medieval (AD1066 - AD1560)
- Post Medieval & Modern (AD1560 onwards)

Archaeological and Cultural Heritage Assets

3.64. The full list of assets identified within their respective study zones is presented within **Table 2: Appendix 3B**. There are no designated or non-designated sites recorded within the Application Site itself. A total of 16 Scheduled Monuments were identified within the 5km study zone, while 10 Listed Buildings (including one Grade I, one Grade II* and eight Grade II) were identified within the 2km study zone (**Figure 3.1: Appendix 3A**). In addition, a total of 16 non-designated assets from the Historic Environment Record (HER) were identified within the 1km study area (**Figure 3.2: Appendix 3A**). However, no World Heritage Sites, Historic Parks and Gardens, Registered Battlefields, Heritage Coasts or Conservation Areas were identified within their respective study zones.

- 3.65. In addition to appraising indirect effects upon the above assets, they will be considered along with the results of previous archaeological work, the site visit and map regression analysis, in order to assess the archaeological potential within the Application Site. These results informed part of the direct impacts assessment.

Archaeological Record

Mesolithic, Neolithic and Bronze Age Periods (10,000BC – 700BC)

- 3.66. While no prehistoric sites lie inside or in close proximity to the Application Site, there are a considerable number of prehistoric barrows in the surrounding landscape, with 12 of the 16 scheduled monuments in the 5km study area being associated with bowl barrows. Bowl barrows are largely dated from the late Neolithic to the late Bronze Age, with most examples being 2400 – 1500 BC. The Historic England entry for bowl barrows describes them as:

“constructed as earthen or rubble mounds, sometimes ditched, which covered single or multiple burials. They occur either in isolation or grouped as cemeteries and often acted as a focus for burials in later periods. Often superficially similar, although differing widely in size, they exhibit regional variations in form and a diversity of burial practices. There are over 10,000 surviving bowl barrows recorded nationally (many more have already been destroyed), occurring across most of lowland Britain. Often occupying prominent locations, they are a major historic element in the modern landscape and their considerable variation of form and longevity as a monument type provide important information on the diversity of beliefs and social organisations amongst early prehistoric communities. They are particularly representative of their period and a substantial proportion of surviving examples are considered worthy of protection.”¹²

- 3.67. In addition to the bowl barrows, a round barrow cemetery is also recorded as a scheduled monument to the south of the Application Site. Round barrows are similar funerary monument dating to the Bronze Age. The historic environment record within 1km contains significantly less indication for prehistoric remains, although NB07 may indicate a possible unscheduled prehistoric barrow.
- 3.68. The above sites indicate that the Application Site lies within a landscape containing wider evidence for prehistoric activity.

Iron Age and Roman Period (700BC – AD410)

- 3.69. Two of the 16 scheduled monuments in the 5km study area also correspond to the Iron Age period; namely the ‘Round called Froxton Wood Castle’ (NA13) and the ‘Slight Univallate Hillfort called Hilton Wood Castle’ (NA14). The former denotes a small embanked enclosure, overlooking a tributary to the River Neet, possibly dating to the late Iron Age. The latter is a hillfort at the summit of a steep ridge, possibly dating to the early Iron Age. These features

¹² <https://historicengland.org.uk/listing/the-list/list-entry/1020082>, last accessed 03/02/21

indicate that the surrounding landscape similarly has evidence for Iron Age settlement activity.

Early Historic and Medieval (AD410 - AD1560)

- 3.70. 'St Anne's Well in Whitstone Churchyard' (NA08) is a scheduled monument denoting a medieval holy well, believed to date from 1309 and set within a building originating from the 15th century. No further sites from the early historic and medieval periods are contained within the HER inside the 1km study area, but several records are associated with agricultural remains such as field systems and plough marks, which are possibly indicative of consistent agricultural land use in the local area since the medieval period.

Post Medieval & Modern (AD1560 onwards)

- 3.71. The majority of the local HER sites, as well as all of the listed buildings, are of predominately post-medieval origin. This includes a mix of residential, agricultural, industrial and ecclesiastical features, as well as several boundary stones (NB14–16) and the aforementioned barrow (NB07). While no recorded sites are present inside the Application Site boundary, the site inevitably has some potential for post-medieval remains associated with its agricultural land use.

Previous Archaeological Work

- 3.72. The local HER also identified four archaeological events within the 1km study area. The extent of the events lie to the west and east of the Application Site and do not comprise any fields within or adjacent to the site, but offer some indication for the local archaeological potential. The summaries of these events are as follows:

Gradiometer Survey at Crinacott Farm: Wessex Archaeology, 2012 (EDV6098)

"Gradiometer survey was successful in identifying anomalies of definite, probable and possible archaeological interest across the site. These anomalies include linear and pit-like responses, which may also be geological, former field boundaries, and several curvilinear anomalies. Event digitised using source in description."

Archaeological Watching Brief at Crinacott Farm: Wessex Archaeology, 2013 (EDV6513)

"Archaeological monitoring during the excavation of cable trenches in three areas within the site considered to be of archaeological potential following geophysical survey, however no features or archaeological deposits were identified."

Monitoring and Recording at Land West of Parsonage Street: AC Archaeology, 2016 (EDV7207)

"Archaeological monitoring and recording was carried out by AC archaeology during groundworks associated with the construction of a solar farm on land west of Parsonage

Wood, Pyworthy, Devon. The groundworks exposed a single ENE to WSW aligned probable ditch (F103) that was located towards the northern extent of the monitored area.”

Geophysical Survey at Southlands Solar Farm: Wardell Armstrong, 2015 (EDV6860)

“Geophysical survey undertaken on land at Southlands Farm, near Holsworthy, Devon. The survey was undertaken to provide information in relation to a planning application for a solar development at the site. A number of the geophysical anomalies detected at the site are believed to be agricultural in origin, including evidence for former ridge and furrow cultivation, former field boundaries, and possible land drains. No other definite archaeological remains were detected at the site.”

Map Regression Analysis

- 3.73. **Figure 3.3: Appendix 3A** contains the 1884 OS map, while **Figure 3.4: Appendix 3A** shows the 1907 OS map. These maps have been selected to show the progression of land use and field boundaries in the area, and can highlight any potential areas of archaeological interest that may have been lost in the subsequent years.
- 3.74. The 1884 OS map (**Figure 3.3: Appendix 3A**) shows that land within the Application Site predominately comprised agricultural fields of relatively consistent sizes. The modern road running approximately west to east through the centre of the site is depicted on this map and appears largely unchanged, while a number of short footpaths are depicted at various points. Some fields are depicted as being rough, uncultivated land and it is not known whether these would have been utilised as grazing land or if they were unused.
- 3.75. Nearby buildings associated with the ‘Monks’ and ‘Lana’ farmsteads are depicted, as is the ‘Methodist Chapel (Wesleyan)’, but no associated buildings appear to be within the Application Site boundary. A small area within the western extent of the Application Site is labelled ‘Piperspool’ but it is not clear what this denotes, although land here comprises sections of uncultivated land on the north bank of the stream. Some small buildings may be visible at this section just outside the site boundary. No archaeological features of significance are depicted within the Application Site on this map.
- 3.76. The 1907 OS map (**Figure 3.4: Appendix 3A**) shows that since its depiction on the 1884 map, the land was largely unchanged and remained in agricultural land use. Many of the fields previously depicted as rough and uncultivated land were brought into agricultural use, albeit not all of them. Footpaths are still discernible within the site, particularly that connecting the farmstead at Trelana (‘Lana’) with ‘Piper’s Pool’. Similarly, the buildings at the Trelana and Monks farmsteads, as well as the Methodist Chapel, are still depicted but none are within the site boundary. No archaeological features of significance are depicted within the Application Site on this map.

Aerial Photography

- 3.77. Relevant databases were consulted for historic aerial photographs of the Application Site. No such images could be sourced from the Cambridge Air Photos or the Britain from Above databases, but several aerial photographs within the National Collection of Aerial Photography are recorded from the 1980s, 1990s and 2000s. However, none of these images have yet been digitised and so are not currently accessible.
- 3.78. No potential archaeological sites are discernible via analysis of modern aerial photography of the Application Site via Google Earth, ArcGIS Pro and Bing Maps.

Site Visit

- 3.79. A walkover survey of the Application Site was conducted by Faye Balmond MCIfA of South West Archaeology Ltd during September 2020, in accordance with the relevant sections of the Chartered Institute for Archaeology Standard and Guidance for historic environment desk-based assessment January 2017. The walkover survey was carried out under conditions varying from slight mist and drizzle to occasional sunshine and clouds. The ground conditions were fair to wet, and fields where livestock had recently been grazing were quite compacted and muddy underfoot. The majority of the fields surveyed were either being utilised for cattle grazing (or had recently been), other were recently cut for silage but the grass had not been collected or were yet to be cut so had long or very long grass. The conditions were therefore not favourable for the detection of archaeological features, particularly those with slight surface expressions.
- 3.80. The likely agricultural use of much of the land within the study area from at least the medieval period onward means that any prehistoric features are unlikely to survive as significant earthworks, although some remains may still exist below ground. The local area is characterised by the high survival of field banks and boundaries dividing the fields, with particularly large boundaries noted at the divisions between land holdings. Most field boundaries consist of an earth bank with a ditch on each side, topped by a low hedge. These are often additionally fenced with modern fencing posts and barbed wire on each side. Many fields have limited field gates or openings, some only accessible through one gate from another field or from the road. A number of small streams were also present across the Application Site, often forming a boundary between fields, sometimes with banks built up on either side. The results of the walkover survey are set out in the table below while the associated field numbers are shown on the map in **Figure 3 of Volume 2: Planning Application Drawings**. Plates from the survey are contained within **Appendix 3C** of this report.

Table 3-1: Results of Walkover Survey by Field

Field Number	Current Cultivation	Comments
1	Grass- just cut for silage and still lying on ground	No visible features although cut grass on ground likely to be obscuring any slight earthworks present.
2	Grass- just cut for silage and still laying on ground	No visible features although cut grass on ground likely to be obscuring any slight earthworks present (Plate 1).
3	Grass	Slight linear feature running from northern boundary to tree. Possible former boundary? (Plate 2)
4	Grass	No visible features.
5	Long Grass	No visible features.
6	Grass	Cows in field, ground trampled. No obvious visible features.
7	Grass	Cows in field, ground trampled. No obvious visible features.
8	Grass	Cows recently moved; ground quite trampled. No visible features.
9	Grass	No visible features.
10	Grass	Cows recently moved; quite trampled ground. No visible features. High boundary bank on east side marking edge of land holding (Plate 3).
11	Grass	Cows recently moved; quite trampled ground. No visible features.
12	Long grass	Possible very slight traces of former boundaries or ridge and furrow ploughing oriented NW-SE on eastern side of field; could be related to more recent agricultural practices (Plate 4).
13	Long Grass	No visible features.
14	Grass	No visible features.
15	Long Grass	No visible features.
16	Long Grass, boggy	No visible features.
17	Long Grass	No visible features.
18	Grass	Cows in field, ground quite trampled. No obvious visible features.
19	Grass	No visible features.
20	Grass - just cut for silage and still lying on ground	No visible features although cut grass likely to be obscuring any slight earthworks present.
21	Grass	No visible features.
22	Grass	Cows in field, ground quite trampled. No obvious visible features.
23	Grass	Cows in field. Ground quite trampled. No obvious visible features.
24	Grass	Electricity pylons located in field. Rectangular feature with banks on each side in north west corner of field - appears recent. Very deep open excavation c. 5m x 5m x 10m deep

		in area between pylons in centre of field surrounded by spoil heaps.
25	Grass	No visible features.
26	Grass	No visible features.
27	Grass	Rubble track leading into adjacent field along N boundary. Historic banks around stream on N side of field.
28	Grass- just cut for silage and still lying on ground	No visible features although cut grass likely to be obscuring any slight earthworks present.

- 3.81. There are a number of designated heritage assets in the surrounding area which the Proposed Development has some potential to impact upon, as mentioned previously within this report.
- 3.82. Views from the Application Site towards the areas containing these monuments are included below, with the exception of the boundary stone to the north of the Proposed Development, which is not visible from within the Application Site. Plates showing relevant views from within the Application Site are contained within **Appendix 3C** as below:
- Views towards Bridgerule are contained within **Plate 5**;
 - Views towards the bowl barrow north of Dux: **Plate 6**;
 - Views towards Pyworthy: **Plate 7**;
 - Views towards the bowl barrows east and southeast of the Application Site: **Plates 8 – 10**.
- 3.83. Overall, the walkover survey identified no earthworks of archaeological significance within the proposed site area; the few that were identified are likely to be removed field boundaries or relate to medieval or post-medieval agricultural land use. However, the ground and vegetation conditions under which the walkover survey was carried out were not ideal for the identification of slight earthworks. In general, there are a lack of heritage assets identified on the Devon Historic Environment Record in this area, which may correspond with a lack of archaeological remains; may be a result of medieval and later agricultural activity removing evidence for earlier occupation or may derive from a lack of archaeological investigation in this area.

ASSESSMENT OF DIRECT EFFECTS

Recorded Archaeological and Heritage Assets

3.84. There are no designated or non-designated heritage assets present within the Application Site. The closest scheduled monument is the NA01 Bowl Barrow located c. 1km to the north, while the closest listed buildings are the Coach House (NA19) and Old Rectory (NA20) located c. 800m to the east. The nearest non-designated asset to the Application Site is the Trelana Methodist Chapel (NB01), which is located adjacent to the central section of the site, on the roadside. As no recorded archaeological or heritage assets are located within the Application Site, **no direct effects** will occur on these resources as a result of the Proposed Development. However, the potential for impacting upon hitherto-unknown features within the Application Site is discussed below.

Ground Disturbance from Construction Methods

- 3.85. Specific direct effects relating to the archaeological potential of the Application Site cannot be accurately ascertained at this stage, but the predicted likelihood of such impacts can be estimated by considering the ground disturbance of the construction methods that will be used. Nonetheless, additional investigation within the Application Site is expected to be required in order to ascertain its archaeological potential.
- 3.86. Different levels of intrusion and disturbance are anticipated for different construction elements of the proposed solar farm. As such, the potential for impacting upon sub-surface remains is dependent on the type and scale of each construction element. All construction elements involving topsoil stripping or deeper excavations are considered to be ground disturbance derived from infrastructure during the construction phase, while impacts resulting from the solar panels themselves, as well as the perimeter fencing, are considered to be ground disturbance derived from piling effects.
- 3.87. The majority of the Application Site area will be utilised for solar panels only, which comprises a 'pin-prick' effect considered to be fairly minimal in terms of potential direct impacts upon sub-surface archaeology. Construction involving topsoil stripping, i.e., temporary construction compound and access tracks, have in general a lower potential for impacting upon sub-surface remains below the archaeological horizon, but retains a similar potential for encountering archaeological remains as construction involving deeper excavation work. Deeper excavation work, including that required for cable trenches, inverter/transformer stations, substations, etc, have the potential to cause direct impacts of a greater magnitude.
- 3.88. Overall, the proposed footprint of the Proposed Development is expected to be less than 5% of the Application Site area (66.33ha), with the highest ground disturbance occurring from the proposed access tracks, battery storage area, temporary construction compounds and cable trenches. A lower area of ground disturbance will occur from excavations required for

infrastructure such as the ancillary buildings. The cumulative 'pin-prick' ground disturbance occurring from the piling for the panels themselves will be less than 0.5% of the Application Site area. Specific details and areas of the construction elements expected to have potential to impact upon sub-surface remains are detailed below:

- 29,200 pile-driven poles at c. 0.008m² footprint each: **233.6m²**
- 1 x Grid Substation, including hardstanding: 25m(L) x 24.1m(W)= **602.5m²**
- 14 x Inverter Substations (including transformer cabinet): 16.0m(L) x 6.0m(W) x 14 = **1,344m²**
- 12 x Inverter Substation Hardstanding Areas: 16.00m(L) x 16.0m(W) x 12 = **3,072m²**
- 8.7km of deer fencing with 2,884 posts at 3m spacing, c. 0.03m² footprint each: **86.52m²**
- 86 CCTV posts at c. 0.64m² footprint each: **55m²**
- 2km of new access track (1.1km of existing access track), at c. 4m wide: **8,000m²**
- 5,000m² of estimated cable trenches, c. 1m deep and up to c. 1m wide: **5,000m²**
- 2 temporary construction compounds at c. 50m x 60m: **6,000m²**

3.89. As such, the overall proposed footprint constitutes a relatively small percentage of the total area of the Application Site (66.33ha):

- 24,072.9m² for infrastructure (c. 3.63% of the Application Site area); and
- 320.12m² for piling (c. 0.05% of the Application Site area).

3.90. The total ground disturbance area resulting from the Proposed Development is therefore **24,393.02m²** or c. **3.68%** of the Application Site area.

Archaeological Potential

3.91. While the lack of any recorded sites inside the Application Site does not suggest any specific indicators for archaeological remains, the baseline analysis and site inspection identified some features of minor significance. This includes linear features likely to represent former field boundaries, footpaths, drains or plough marks / ridge and furrow. Above-ground remains identified during the site inspection were indistinct and very subtle, so it cannot be ascertained that they are of archaeological origin, but the features have potential to represent the above historical agricultural land use features, likely dating from the post-medieval period and possibly the medieval period. It is also noted that confirmed remains from local fieldwork results mentioned previously are limited to similar linear ditch features. As such, by considering the above ground disturbance calculations, the potential for the proposed

development to impact upon medieval and post-medieval agricultural remains is considered to be **Moderate to low**, with such remains likely to be of **Low/Local** importance.

- 3.92. Consultation with the council planning and archaeology departments highlighted that, although there is a lack of designated heritage assets inside the Application Site, there may be potential for prehistoric remains due to the number of bowl barrows (scheduled monuments) identified in the surrounding area. The locations of these monuments (see **Figure 3.1: Appendix 3A**) indicates that the landscape in general has potential for remains associated with prehistoric settlement activity. As the site inspection identified, the likely agricultural use of much of the land within the study area from at least the medieval period onward means that although any prehistoric features are unlikely to survive as above-ground earthworks, some remains may still exist below ground. As such, by considering the above ground disturbance calculations, the potential for the Proposed Development to impact upon prehistoric remains is considered to be **Low**, but with such remains likely to be of potentially **High** significance.
- 3.93. In consideration of the above, the primary concern for potential direct effects on hitherto-unknown archaeology throughout the Application Site is the potential for prehistoric remains. This is considered to be applicable to all fields due to the site being located within a landscape of prehistoric bowl barrows, as well as its relative lack of significant ground disturbance. While there are no specific indicators for sub-surface remains within the site, the potential to encounter prehistoric remains will require further field evaluation prior to any construction. This is discussed in more detail in the mitigation section.

ASSESSMENT OF INDIRECT EFFECTS

- 3.94. The ZTV was overlain onto the heritage assets map in order to identify those which have a greater potential to be visually impacted by the Proposed Development. The ZTV does not account for intervening hedgerows, trees or built structures, which will limit the intervisibility between the building/monument and the Proposed Development.
- 3.95. Within their respective study zones, a total of seven Scheduled Monuments, six Listed Buildings (including one Grade II* and five Grade II) are located within the ZTV. These assets are therefore assessed for indirect effects below. Non-designated sites within the Devon and Dartmoor HER will also be considered for indirect effects where there are exceptional qualities such as significant standing remains which indicates their sensitivity to indirect impacts.
- 3.96. Records for the designated heritage assets, including scheduled monuments and listed buildings, were consulted primarily via The National Heritage List for England (NHLE), as curated by Historic England. Direct record entries listed below for assets were each obtained via this resource¹³.

Scheduled Monuments

Bowl Barrow near Dux (NA01)

- 3.97. The 'Bowl Barrow 470m North East of Dux' is a scheduled monument located c. 1km to the north of the Application Site. As mentioned within the earlier baseline section, this type of barrow is usually indicative of Late Neolithic to Late Bronze Age funerary activity. It is described within its Historic England entry as follows:

"This monument includes a bowl barrow situated on the watershed between the valleys of a tributary to the River Tamar and a tributary to Derwent Water. The monument includes a circular mound which measures 33.2m in diameter and 1.3m high. The surrounding quarry ditch from which material to construct the mound was derived is preserved as an approximately 3m wide buried feature."

- 3.98. The setting of the bowl barrow comprises an agricultural field on the south side of the adjacent local road. Its immediate setting is somewhat beneficial to its heritage value, although the wider setting, including the Application Site, is not considered to contribute to this value. The bowl barrow is therefore considered to be partially sensitive to visual impacts that may potentially occur as a result of the Proposed Development. However, views and intervisibility with the bowl barrow are not anticipated to be possible from points within the Application Site as the site visit identified that views in this direction from the western fields will be screened by woodland on its north side, while views from the eastern fields are

¹³ <https://historicengland.org.uk/listing/the-list/>, last accessed 27/01/21.

screened by a ridge in the intervening area (see **Plate 6: Appendix 3C**). As such, indirect effects upon this bowl barrow are anticipated to be **Negligible**.

Bowl Barrows near Leworthy (NA02, NA03 & NA05)

3.99. There are three bowl barrow records located near Leworthy, all of which are scheduled monuments. These records are as follows:

- ‘Two bowl barrows 690m and 760m south west of Leworthy’ (NA02), located c. 1.6km to the east-southeast of the Application Site;
- ‘Two bowl barrows 450m and 500m west of Leworthy’ (NA03), located c. 1.7km to the east-southeast of the Application Site; and
- ‘Two bowl barrows 430m north west of Leworthy’ (NA05), located c. 1.8km to the east of the Application Site.

3.100. As mentioned within the earlier baseline section, this type of barrow is usually indicative of Late Neolithic to Late Bronze Age funerary activity. They are described within their Historic England entries as follows:

“This monument, which falls into two areas, includes two bowl barrows aligned north-south and situated on a high upland ridge known as Affaland Moor. These two barrows form part of a group of eight barrows spread along the ridge. The northernmost barrow of the two survives as a 0.2m high circular mound with a diameter of 25m. This mound was slightly damaged by the construction of a military building, which has subsequently been removed. The second barrow lies to the south west, measures 25m in diameter and is 1.2m high. Both mounds are surrounded by separate ditches from which material to construct the barrows was derived. These are preserved as buried features 2.5m wide. A boundary bank crossing the north side of the northern barrow is excluded from the scheduling, but the ground below is included.” (NA02)

“This monument, which falls into two areas, includes two bowl barrows aligned north-south and situated on a high ridge overlooking the valley of a tributary to the River Deer. These two barrows form part of a dispersed group of eight barrows spread across the length of this ridge. The northern barrow survives as a 0.7m high circular mound which measures 25.9m in diameter. The southern barrow survives as a circular mound which measures 28.8m in diameter and 1.2m high. Surrounding both barrows is the ditch from which material to build the mounds was obtained and these survive as buried features 3m wide. The boundary banks north east of the northern mound and south of the southern mound are excluded from the scheduling, although the ground beneath them is included.” (NA03)

“This monument includes two bowl barrows aligned north east - south west situated 430m north west of Leworthy on a prominent ridge location overlooking the valley of a tributary to the River Deer. They form the northernmost pair of a dispersed group of eight barrows. The

north eastern barrow survives as a circular mound which measures 18.2m in diameter and is 0.4m high. The second barrow survives as a circular mound which measures 20.7m in diameter and is 0.6m high. In each case the surrounding ditch from which material to construct the mound was derived is preserved as a buried feature. The remaining six barrows within this group are the subject of separate schedulings.” (NA05)

- 3.101. The cluster of bowl barrows share a setting comprising a small series of agricultural fields on the eastern side of the adjacent local road. The immediate setting is largely undeveloped but there are a number of farmsteads, roads and other light development in the surrounding area. This local setting is somewhat beneficial to its heritage value, although the wider setting, including the Application Site, is not considered to contribute to this value. The bowl barrow is therefore considered to be partially sensitive to visual impacts that may potentially occur as a result of the Proposed Development. However, clear views and intervisibility with the bowl barrow are not anticipated to be possible due to the screening effects from intervening field boundaries and vegetation. These elements are expected to block views across the mostly flat landscape due to the relatively low-lying nature of the Proposed Development and the ground remains, which appear to be set into the fields behind hedgerows 2-3m in height. As such, only very limited views and intervisibility are predicted to be possible from certain points in the landscape through the screening effects of the intervening vegetation. Visibility with the bowl barrows was not possible during the site visit although foggy conditions were not optimal for confirming this (**Plates 8 & 9: Appendix 3C**). Any partial views possible would not be considered harmful to the setting of the assets or their heritage value. Indirect effects upon this cluster of bowl barrows are therefore anticipated to be **Low to negligible**.

St Anne’s Well in Whitstone Churchyard (NA08)

- 3.102. St Anne’s Well in Whitstone Churchyard is a scheduled monument located c. 3.9km to the southwest of the Application Site. It is described within its Historic England entry as follows:

“The monument includes a medieval holy well, known as St Anne’s Well, situated in the churchyard at Whitstone. St Anne’s Well survives as a small building over a well basin, extending into the hillside, with a granite faced facade. The structure measures 1.56m high, the apex at the front surmounted by an ornate gable cross, 0.79m in height, giving an overall height of 2.32m, and is 1.62m wide [...] This holy well, which is Listed Grade II, is believed to date from 1309, though the building probably dates from the 15th century, and was substantially restored around 1883. The granite and greenstone facade probably dates from this restoration, as ‘Saint Anna’ was carved around the arched doorway at this time.”

- 3.103. The well sits within a well-defined and closely contained setting associated with the Whitstone Churchyard. It therefore benefits from the group setting value with the church and graveyard features, while the enveloping mature trees prevent most views with the surrounding landscape. The setting is therefore a key contributor to its heritage value and the asset would be considered sensitive to visual impacts resulting from the Proposed Development. However, due to the surrounding mature trees and the presence of numerous field boundaries, vegetation, roads and buildings in the large intervening area, no views or

intervisibility are expected to be possible with the Proposed Development. Indirect effects are therefore anticipated to be **Negligible**.

Round barrow cemetery 240m north east of Lower Trebarrow (NA11)

- 3.104. The round barrow cemetery is a scheduled monument located c. 4.15km to the south of the Application Site. This type of barrow is usually indicative of Late Bronze Age funerary activity, and where it constitutes a cemetery such as this one it implies a considerable burial area associated with this period. It is described within its Historic England entry as follows:

“The monument, which falls into four areas of protection, includes a round barrow cemetery, situated on the summit of a ridge forming the watershed between two tributaries of the River Tamar. The cemetery survives as a linear arrangement of circular mounds surrounded by buried quarry ditches, from which their construction material was derived. The barrows vary in size from 18m up to 24m in diameter and from 0.3m to 0.9m high. One is situated within a garden.”

- 3.105. The setting of the round barrow cemetery and its four areas of protection comprise agricultural fields on the north side of the adjacent local road and the associated residential and farm buildings. The immediate setting is mostly undeveloped but there are a number of further farmsteads, roads and other light development in the surrounding area. This local setting is somewhat beneficial to its heritage value, although the wider setting, including the Application Site, is not considered to contribute to this value. The round barrows provide a strong group setting to one another, although their primary heritage value is derived from their potential to contain sub-surface remains. However, the barrows are located on notably elevated land and clear views in all directions are possible, including northwards towards the Application Site. As such, views with the surrounding landscape are presumed to have been integral to their original siting here. The asset is therefore considered to be sensitive to visual impacts that may potentially occur as a result of the Proposed Development.
- 3.106. Clear views and intervisibility with the round barrow cemetery is expected to be partially possible due to its elevated position, although this could not be determined during the site visit due to foggy conditions. However, views with the Proposed Development are likely to be partly screened by numerous field boundaries, blocks of woodland, vegetation, roads and buildings in the large intervening area. At this distance, such views would be not harmful to the heritage value of the round barrow cemetery or its setting. Indirect effects are therefore anticipated to be **Low to negligible**

Bowl Barrows near Cherry Cross (NA16)

- 3.107. The ‘Three Bowl Barrows 560m South East of Cherry Cross’ are a scheduled monument located c. 4.8km to the southwest of the Application Site. As mentioned within the earlier baseline section, this type of barrow is usually indicative of Late Neolithic to Late Bronze Age funerary activity. It is described within its Historic England entry as follows:

“The monument, which falls into three areas of protection, includes three bowl barrows, situated close to the summit of a prominent branching ridge forming the watershed between tributaries to the River Tamar and Caudworthy Water. The barrows survive as circular mounds, surrounded by buried quarry ditches, from which their construction material was derived. The northern barrow is a considerable distance from the other two and measures 32m in diameter and 1.5m high. The central barrow stands up to 27m in diameter and 1m high, whilst the southern barrow mound is 35m in diameter and 1m high. These two barrows are relatively closely-spaced.”

- 3.108. The northernmost barrow lies inside the 5km study area while the other two lie outside the study area. However, together they contribute somewhat their group setting. The setting of the northernmost barrow also contains a notable amount of modern development, including overhead lines and pylons in close proximity, as well as farm and residential buildings and the B3254 road on its western side. These modern elements somewhat compromise the contribution that the setting makes to the heritage value of the bowl barrow. As such, the local (and wider) setting of the asset does not significantly benefit its heritage value and it is therefore considered to be only slightly sensitive to visual impacts that may potentially occur as a result of the Proposed Development. Views and intervisibility with the Proposed Development are also expected to be very unlikely, despite the relatively elevated position within the local area. This is due to the large distance from the Application Site and the screening effects from intervening field boundaries, vegetation and farm buildings in the landscape. Any residual views or intervisibility that are possible will not be at all harmful to the setting or heritage value of the asset. Indirect effects are therefore anticipated to be **Negligible**.

Listed Buildings

Listed Buildings within Pyworthy (NA18, NA22 & NA23)

- 3.109. The Grade II* listed Church of St Swithin (NA18) and the Grade II listed Robert Beckley Monument (NA22) and The Villa (NA23) are listed buildings located c. 1.3 – 1.35km to the northeast of the Application Site, within the village of Pyworthy. They are described within their Historic England entries as follows:

“Anglican parish church. Pre-Conquest foundation, early C14 alterations to chancel, north and south aisles built with clerestorey, south aisle refenestrated C15 and tower added c1400, north aisle refenestrated early C16, extensive restoration of 1885 including reroofing, reseating, reflooring and many windows renewed by R. Medley Fulford of Exeter. Random rubble local stone, Hatherleigh stone dressings, slate roofs, coped verges, decorative ridge tiles. Three bay chancel, 4-bay nave with north and south aisles and clerestorey, west tower, south porch. 4-stage tower with angle buttresses to second stage, no parapet, small, plain pyramid finials, 2-light louvred bell openings, clock, stairlight on south front, 2-light window above C19 trefoil-headed doorway approached by external flight of stairs in south-east corner, no west door or west window.” (NA18)

“Chest tomb. Dated 1701. Red sandstone squared and coursed, slate slab. Chamfered plinth, cyma recta moulded cornice. Slate slab inscribed around the perimeter in Latin to Robert Beckley, rector, died 19 October 1701. Poem in English in centre extolling his virtues.” (NA22)

“House. Early C19. Rendered over rubble and brick, pyramid slate roof, stacks rising from eaves on returns, roughcast left, rebuilt brick right. Plan: double pile house abutting cottage to north. 2 storeys, 3 bays, 16-pane sash windows, central flat roofed porch with console brackets and monolithic granite piers with residual capitals. Right return fronting road similar window first floor right and below on ground floor in shallow slate roofed projection. The sturdy granite columns look as if designed to carry something much heavier than the flimsy porch canopy, which is probably not coeval.” (NA23)

- 3.110. The three listed buildings within Pyworthy are located in close proximity to one another and therefore share a setting comprising its urban development. However, the Church of St Swithin possesses its own well-defined setting containing its associated graveyard and church grounds, including the Robert Beckley Monument (NA22). As such, this asset benefits greatly from its localised setting within Pyworthy, but the wider setting outside Pyworthy contributes significantly less to its setting and heritage value. Similarly, the urban setting of The Villa indicates that it would not be particularly sensitive to visual changes occurring in the wider landscape outside of Pyworthy.
- 3.111. The site visit identified that most buildings in Pyworthy, including NA22 and NA23, were not visible from within the Application Site, but the tower of the Church of St Swithin (NA18) was confirmed to be visible from Field 10 as well as several other fields (**Plate 7: Appendix 3C**). As a result, no views or intervisibility are expected to be possible from NA22, NA23 or the ground floor and setting of NA18. However, views to and from the tower of the church are possible and will result in indirect impacts, albeit somewhat lessened by the surrounding urban environs within its local setting. As such, indirect impacts upon NA22 and NA23 are anticipated to be **Negligible** while indirect impacts upon NA18 are anticipated to be **Low**.

Coach House (NA19) and Old Rectory (NA20)

- 3.112. The Coach House (NA19) and Old Rectory (NA29) are two Grade II listed buildings located c. 0.8km to the east of the Application Site. They are described within their Historic England entries as follows:

“Coach house and stables, now dwelling. Circa 1836, restored and converted c1980. Random rubble local stone, brick dressings, slate roofs, C20 brick stack centre left on main elevation. L-plan linked at east corner to the Old Rectory (q.v) by doorway in short section of wall. Two storeys, 3 bays, first floor 2-light casements with pointed arch lights, similar ground floor left and 3-light left inserted into former doorway opening.” (NA19)

“The Old Rectory and walls enclosing garden to North-East GV Rectory, now dwelling, with walls enclosing former kitchen garden. 1836, minor alterations c1900. Random rubble with brick dressings, hipped slate roof with boarded eaves, large brick stack at junction with service

wing, the latter lower, independently roofed with hipped slate roof of steeper pitch [...] 2 storeys, 3 bays, pilaster quoins, projecting central bay and full height segmental headed recesses to outer bays, all 16-pane sash windows, central Doric porch, wooden columns resting on granite and brick blocks, pilaster doorcase, handsome double doors of 6 panels each [...] Some of the original marble chimneypieces and cast iron grates survive on upper floor including an opulent cast iron hob grate in a bedroom in the south-east corner of the service wing. Garden walls: c1836, random rubble local stone, slate and cement humpback coping, returned on 3 sides from north-east corner of the Old Rectory enclosing about half an acre, pilaster buttresses and pointed arch openings in north and south walls.” (NA20)

- 3.113. The setting of the two listed buildings is well-defined by surrounding woodland and comprises well-maintained grounds which greatly benefits the buildings themselves. The limited modern development within their curtilage does not detract from the group value of the setting and its contribution to their heritage value. As a result, the two listed buildings are considered to be sensitive to visual impacts that may potentially occur as a result of the Proposed Development. However, views and intervisibility with the Application Site were not identified to be possible during the site inspection. Such views were found to be mostly screened by mature trees along the adjacent local road as well as blocks of woodland on the eastern side of the Application Site. Any limited intervisibility that may be possible through the considerable screening effects will not be harmful to the heritage value of the listed buildings or their setting. Indirect effects are therefore anticipated to be **Low to negligible**.

Boundary Stone (NA21)

- 3.114. The boundary stone at NGR SS 3007 0338 is a Grade II listed building located c. 0.95km to the north of the Application Site. It is described within its Historic England entry as follows:

“Boundary stone. Early C19. Monolithic slate slab built into parapet of bridge. Inscribed vertically in good lettering 'Bridgerule/Pyworthy' with bench mark above. Part of a good group of boundary stones in the area.”

- 3.115. The nature of the listed building indicates that it shares a relationship with its immediate surroundings but not with its wider setting or the Application Site. As such, it is not considered to be sensitive to visual impacts that may potentially occur as a result of the Proposed Development. In addition, its low-lying position within a heavily wooded area is expected to completely prevent any possible views or intervisibility with the Proposed Development. Indirect effects are therefore anticipated to be **Negligible**.

Historic Environment Record

- 3.116. There is a total of 16 non-designated HER sites that are within the 1km study zone, including nine polygon features and seven point features within the records. These sites can be used to evaluate the potential for archaeological remains within the Application Site. However, although all of these HER sites lie within the calculated ZTV, they are considered to be considerably less sensitive to possible visual impacts than designated assets. As such, indirect

effects upon most HER sites are anticipated to be **Negligible** unless they contain exceptional qualities such as significant standing remains or beneficial settings which indicates their sensitivity to such impacts. Such features are discussed below.

- 3.117. The closest HER feature to the Application Site is the Trelana Methodist Chapel (NB01), which is a 19th century Wesleyan Chapel adjacent to the central channel of the Application Site. The chapel is depicted in this roadside location on 19th century OS mapping, but there is no longer any sign of the chapel and in its place is a modern house.
- 3.118. Also near to the site is the Trelana Farm feature, which had numerous farm buildings depicted at this location on 19th century OS mapping. While some minor fabric appears to survive at the farm, there has been a substantial amount of large modern farm buildings constructed within their curtilage and which now dominate their setting. As a result, this feature is not considered to be sensitive to visual impacts from the Proposed Development.
- 3.119. No other features within the HER are considered to be potentially sensitive to visual impacts from the Proposed Development either. In consideration of the above, indirect effects upon the non-designated features within the HER are anticipated to be **Negligible**.

Cumulative Indirect Effects

- 3.120. Cumulative visual impacts have been assessed in detail within **Technical Appendix 1: Landscape and Visual Impact Assessment**. As part of the cumulative assessment, a search of the Torridge online planning application portal accessed on the 2th February 2020 was undertaken and incorporated a 5km study area. Similar cumulative developments including solar farms, wind turbines and elements of existing electricity infrastructure are identified in the table below. No similar application developments in planning were identified during the planning application search.
- 3.121. During fieldwork it was identified that potential cumulative landscape and visual interactions resulting from the introduction of the Proposed Development would be largely localised and the cumulative appraisal has therefore been limited to considering similar operational and consented developments within 2km.

Table 3-2: Cumulative Developments within 2km

Ref. No:	Name	Development	Status	Distance & Direction from the Site
Operational				
n/a	Pyworthy substation	Substation	Operational	0.08km east of Field 18

n/a	Overhead Lines (275kV)	Overhead Lines	Operational	Passes through Field 20
1/0883/2012 1/0753/2015	Crinacott Farm/ Land West of Parsonage Farm (Crinacott extension)	Solar Farm	Operational	0.3km southeast of Field 20
1/1005/2015/FUL	Land At Bradford Manor Farm	Solar Farm	Operational	1.2km southwest of Field 2
1/0833/2012	Pitworthy Farm Solar Park	Solar Farm	Operational	2.2km north, northwest of Field 12
1/0218/2011/FULM 1/1131/2020/FULM (Extension to operational life)	Great Knowle Farm Solar	Solar Farm	Operational	2.7km northeast of Field 16
1/0978/2012/FULM	Derriton Fields Solar Farm	Solar Farm	Operational	2.7km east of Field 16
1/1318/2007/FUL	Crinacott Farm	Wind Turbine (12m blade tip)	Operational	0.3km southeast of Field 20
1/0766/2013/FUL	Taston Farm	Wind Turbine (45m blade tip)	Operational	1.1km northwest of Field 10
1/0657/2013/FUL	East Balsdon Farm	Wind Turbine (77m blade tip)	Operational	1.3km southwest of Field 1
PA13/05242	Hollafrench Farm (Cornwall Council)	Wind Turbine (37m blade tip)	Operational	2.5km southeast of Field 27
PA14/07283	Haydon Farm (Cornwall Council)	Wind Turbine (37m blade tip)	Operational	3.8km southwest of Field 1

Consented				
1/1107/2008/FUL	Yeomadon Farm	Wind Turbine (9m blade tip)	Consented	1km southeast of Field 27
1/0502/2015/FULM	Holladon Farm	Wind Turbine (57m blade tip)	Consented	1.7km north of Field 15

3.122. The Landscape and Visual Impact Assessment concludes that:

“Once operational the addition of the Proposed Development in combination with the existing operational, and consented developments will result in a Moderate adverse cumulative visual effect experienced from Viewpoint 8 (Footpaths 1 and 3). From other visual receptors cumulative visual effects will be Minor adverse or lower.”

3.123. As the Landscape and Visual Impact Assessment identified that moderate cumulative visual effects as a result of the Proposed Development will be limited to local footpaths, while only minor cumulative visual effects will occur elsewhere, no additional significant cumulative visual effects are considered to be present for surrounding heritage assets.

Summary of Indirect Effects

3.124. There were seven scheduled monuments identified within the 5km study zone that lie inside the calculated ZTV for the Proposed Development. Of these assets, **Low to negligible** indirect effects are anticipated for the ‘Two Bowl Barrows 690m and 760m South West of Leworthy’ (NA02), the ‘Two Bowl Barrows 450m and 500m West of Leworthy’ (NA03), the ‘Two Bowl Barrows 430m North West of Leworthy’ (NA05) and the ‘Round Barrow Cemetery 240m North East of Lower Trebarrow’ (NA11), while **Negligible** effects are anticipated for the ‘Bowl Barrow 470m North East of Dux’ (NA01), ‘St Anne’s Well in Whitstone Churchyard’ (NA08) and the ‘Three Bowl Barrows 560m South East of Cherry Cross’ (NA16).

3.125. There were six listed buildings, including one Grade II* and five Grade II, identified within the 2km study zone that lie inside the calculated ZTV for the Proposed Development. Of these assets, **Low** indirect effects are anticipated for the ‘Church of St Swithin’ (NA18), while **Low to negligible** effects are anticipated for ‘The Coach House’ (NA19) and ‘The Old Rectory’ (NA20), and **Negligible** effects are anticipated for the ‘Boundary Stone at NGR SS 3007 0338’ (NA21), the ‘Robert Beckley Monument’ (NA22) and ‘The Villa’ (NA23).

3.126. There were 16 non-designated sites identified in the HER that are within the 1km study zone, including nine polygon records and seven point records, all of which lie inside the calculated ZTV of the Proposed Development. **Negligible** indirect effects are anticipated for all 16 sites (NB01 – 16).

- 3.127. There were no Parks and Gardens of Special Historic Interest, Conservation Areas, World Heritage Sites, Heritage Coasts or Historic Battlefields identified in their respective study zones.
- 3.128. As the Landscape and Visual Impact Assessment identified that moderate cumulative visual effects as a result of the Proposed Development will be limited to local footpaths, while only minor cumulative visual effects will occur elsewhere, no additional significant cumulative visual effects are considered to be present for surrounding heritage assets.

MITIGATION MEASURES

Direct Effects upon Recorded Assets

- 3.129. As no designated or non-designated heritage assets were identified within the Application Site, no direct effects will occur on these resources as a result of the Proposed Development. As such, **no mitigation measures are deemed to be necessary in relation to direct effects upon recorded heritage assets.**

Archaeological Potential

- 3.130. The potential for the proposed development to impact upon medieval and post-medieval agricultural remains is considered to be **Moderate to low**, with such remains likely to be of **Low/Local** importance, while the potential for the proposed development to impact upon prehistoric remains is considered to be **Low**, but with such remains likely to be of potentially **High** significance. This archaeological potential is considered to be applicable to all fields within the Application Site due to it being located within a landscape of prehistoric bowl barrows, as well as its relative lack of significant ground disturbance. While there are no specific indicators for sub-surface remains within the site, the potential to encounter prehistoric remains in particular will require further investigation prior to any construction.
- 3.131. It is recommended that additional investigation is undertaken via an appropriate programme of archaeological works undertaken and overseen by a qualified archaeologist. The programme of works should include scope for field evaluation such as a **geophysical survey, with subsequent trial trenching designed to target anomalies from the geophysical survey as well as areas expected to experience high ground disturbance during the construction phase (as detailed in the above 'ground disturbance' section)**. Consultation with Laura Davies, the Principal Planning Officer, on 19th January, highlighted that such evaluation work is likely to be appropriate as part of a written scheme of investigation done as a pre-commencement condition. The results of this evaluation work will then inform the requirement for any further mitigation, such as additional excavation or archaeological monitoring during the construction stage.
- 3.132. Any requests and requirements for archaeological work is at the discretion of Devon County Council and their Historic Environment Team. Any programme of archaeological works should be prepared and submitted to such for approval, and any archaeological mitigation work will be done in accordance with an agreed Written Scheme of Investigation.

Indirect Effects

- 3.133. Indirect effects upon the surrounding heritage assets have been assessed as **Low** in the worst-case. Therefore, no specific mitigation is considered to be required for the reduction of any visual impacts.

RESIDUAL EFFECTS

- 3.134. As no direct effects are anticipated upon recorded heritage assets, no specific mitigation measures are required in relation to these resources and so **no residual direct effects** are anticipated upon recorded heritage assets.
- 3.135. Following the implementation of an appropriate archaeological programme of works as outlined above, measures will be in place for further investigation of the archaeological potential of the Application Site, as well as for the full recording or preservation of any sub-surface remains of significance that are identified within the Application Site. Assuming this is implemented, **residual direct effects upon sub-surface archaeological remains are estimated to be Low.**
- 3.136. As no mitigation is expected to be required for indirect effects, residual indirect effects can be considered to be unchanged at **Low** in the worst-case.

SUMMARY

- 3.137. All potential direct and indirect impacts upon designated and non-designated heritage assets within the study zones have been assessed through appropriate methods.
- 3.138. As no direct effects are anticipated upon recorded heritage assets, no specific mitigation measures are required in relation to these resources and so **no residual direct effects** are anticipated upon recorded heritage assets.
- 3.139. Following the implementation of an appropriate archaeological programme of works as outlined above, measures will be in place for further investigation of the archaeological potential of the Application Site, as well as for the full recording or preservation of any sub-surface remains of significance that are identified within the Application Site. Assuming this is implemented, **residual direct effects upon sub-surface archaeological remains are estimated to be Low.**
- 3.140. As no mitigation is expected to be required for indirect effects, residual indirect effects can be considered to be unchanged at **Low** in the worst-case.

Compliance with Relevant Policies

- 3.141. This assessment has been conducted to meet the criteria and standards set out by the relevant authorities, including ClfA, Historic England and the local authority.
- 3.142. The Proposed Development has been considered in relation to international, national and local policies throughout the design process. As such, the full array of archaeological and architectural heritage features at risk of potential impacts from the Proposed Development have been identified from the appropriate sources and assessed for impacts that may constitute interference or harm to their character or setting, in line with the relevant policy and guidance.
- 3.143. With the implementation of appropriate mitigation, the Proposed Development will not significantly affect the assets or their settings and complies with the relevant policies and guidance at both national and local levels.