TRAFALGAR PARK
DOWNTON
WILTSHIRE

Results of an Archaeological Assessment



South West Archaeology Ltd. report no. 220714

ARCHAEOLOGICAL SERVICES & HISTORIC BUILDING RECORDING
SOUTHWEST ARCHAEOLOGY

www.swarch.net Tel. 01769 573555
01872 223164

Trafalgar Park, Downton, Wiltshire
Results of an Archaeological Impact Assessment

By F. Balmond MCIfA and E. Wapshott MCIfA
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Work undertaken by SWARCH for a private client (the Client)

SUMMARY

This report presents the results of an archaeological assessment carried out by South West Archaeology Ltd. (SWARCH) for a proposed new sewerage system and soakaway at Trafalgar Park, Downton, Wiltshire.

Trafalgar House is Grade I Listed and a number of Grade II Listed heritage assets are located around the property. It also lies within the Grade II Listed Registered Park and Garden. The site lies in the parish of Downton, although for some of its history comprised a parish in its own right, documented as a settlement at Domesday. By the mid-15th century it appears all three portions of the manor were united and the Standlynch estate was purchased by Sir Peter Vandeput Bt in 1726, construction of the present house starting in 1733, the garden designs planned by Charles Bridgeman. Standlynch House was purchased in 1815 by the Crown for the heirs of Vice-Admiral Horatio Nelson, Viscount Nelson and renamed the Trafalgar Estate. William Butterfield was commissioned in 1859 to remodel the formal gardens to their present form. Trafalgar House remained in the Nelson family until its sale was permitted by the Trafalgar Estates Act 1947. It was sold in 1948, 1953, 1958, 1961, 1971, 1992 and 1995 and the estate has recently changed ownership again.

A walkover survey of the site confirmed the drainage and soakaway will affect a small area of the north gardens, currently laid to lawn, dotted with mature specimen trees and an area of grass parkland, now fenced off and used to graze cattle. No earthworks were observed in the field and there was no distinct parch-marking to suggest below ground deposits, although this does not preclude their presence. Within the gardens, some defined, irregular changes in slope suggest the parterre along the west front also wrapped around the north pavilion. There was a slight rectangular sunken feature, now planted with a specimen tree which may indicate the position of a former 'border', other small hollows were probable tree boles. The site lies within 100m of a Grade I listed building and the desk-based assessment has not been able to definitively confirm the presence or absence of historic archaeology relating to former gardens, as the historic plans and maps which document the estate are mostly sketches. However, we could reasonably make the assumption that a lack of formal gardens being shown, could indeed mean that apart from the Butterfield designs from the 1850s, no formal planting ever occurred around the new house in its hilltop position and the earlier 1730s designs may have initially been executed near the river and were then abandoned, when the house was moved.

*With this in mind, the overall impact of the proposed development can be assessed as **negligible**. The impact of the development on any buried archaeological resource may be **permanent** and **irreversible** but can be mitigated through an appropriate programme of limited and proportionate archaeological investigation during commencement works, to evaluate the need for further investigation or to discharge any planning conditions.*

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ACKNOWLEDGEMENTS

THE LANDOWNER, FOR ACCESS
THE AGENT

PROJECT CREDITS

DIRECTOR: DR SAMUEL WALLS MCIFA
FIELDWORK: EMILY WAPSHOTT MCIFA
REPORT: FAYE BALMOND MCIFA AND EMILY WAPSHOTT MCIFA
DESK-BASED ASSESSMENT: FAYE BALMOND MCIFA
EDITING: DR SAMUEL WALLS, MCIFA
GRAPHICS: FAYE BALMOND MCIFA

1.0 INTRODUCTION

LOCATION: TRAFALGAR PARK
PARISH: DOWNTON
COUNTY: WILTSHIRE
CENTROID NGR: SU 18583 23806
PLANNING NO. PRE-PLANNING
SWARCH REF. WDTH22
OASIS REF. SOUTHWES1-508089

1.1 PROJECT BACKGROUND

Southwest Archaeology Ltd. (SWARCH) was commissioned to undertake a archaeological assessment for a proposed sewerage system and soakaway at Trafalgar Park, Downton, Wiltshire. This work was undertaken in accordance with best practice and CIfA guidelines.

1.2 TOPOGRAPHY

The proposed new sewerage system lies predominantly on the western side of the north wing of Trafalgar Park, with some new drainage to be installed in the main house and connecting passageways between the main house and wings. The proposed soakaway would be located to the northwest of the north wing. Trafalgar Park lies c.2km to the north of the settlement of Downton and c.900m to the east of Charlton All Saints. It is located at approximately 83m AOD. The site lies on the Newhaven chalk formation (BGS; 2022).

1.3 HISTORICAL & ARCHAEOLOGICAL BACKGROUND

The site lies in the parish of Downton, although for some of its history comprised a parish in its own right. It was documented as a settlement at Domesday under three land holders. By the mid-15th century, it appears all three portions of the manor were united under the ownership of Henry Hugyn. It was purchased by William Green in 1551 and was in the possession of Walter Buckland by 1587. Standlynch was purchased by Sir Peter Vandeput Bt in 1726. He was responsible for the construction of the present house and commissioned garden designs by Charles Bridgeman. It was then sold by his son in 1752 to William Young who sold it in 1766 to Henry Dawkins. Dawkins enlarged the house to its present form, adding the north and south wings to designs by John Wood and with decoration by Nicholas Revett, who also designed the porch. It was at this date that Cipriani also undertook the decoration of the parlour at the southeast corner. Standlynch House was purchased in 1815 by the Crown for the heirs of Vice-Admiral Horatio Nelson, Viscount Nelson and renamed the Trafalgar Estate. It was initially held by the brother of Horatio Nelson, who himself had no legitimate heirs and descended through the family until it was permitted to be sold by the Trafalgar Estates Act 1947. William Butterfield was commissioned in 1859 to remodel the formal gardens to their present form, possibly reusing elements of the earlier garden designs. The Trafalgar Estate was sold in 1948 to John Francis Godolphin, Earl of Leeds and then in 1953 to Jacob Pleydell-Bouverie, Viscount Folkstone (VCH 1980). The estate then comprised part of the Longford estate until it was sold in 1958 to Associated Electrical Industries Ltd and then in 1961 to Oliver Lyttelton, Viscount Chandos. It was sold again in 1971 to Mr Pinckney, in 1992 to Mr Gunnar Bengtsson then in 1995 to Michael Wade. The estate has recently changed ownership again.

The village at Standlynch was located in the southwest corner of the parish, close to the river Avon. By the 17th century the village was recorded as comprising the manor house, church, farmstead and mill (VCH 1980). Standlynch House (later Trafalgar House then Trafalgar Park) was constructed in 1733 on higher ground northeast of the village. The land surrounding it was

emparked at this date. A new farmstead was constructed near water meadows to the north of Standlynch and the original settlement of Standlynch was abandoned at this date, with the manor house and farmstead demolished. The wilderness gardens of the old Standlynch Manor House became the walled kitchen garden for Standlynch House.

Trafalgar House is Grade I Listed, and a number of Grade II Listed heritage assets are located around the property. It also lies within the Grade II Listed Trafalgar House Registered Park and Garden. There are no Scheduled Monuments within 1km of the site.



FIGURE 1: SITE LOCATION.

1.4 METHODOLOGY

The desk-based assessment follows the guidance as outlined in: *Standard and Guidance for Archaeological Desk-Based Assessment* (CIfA 2020) and *Understanding Place: historic area assessments in a planning and development context* (Historic England 2017).

The historic visual impact assessment follows the guidance outlined in: *Conservation Principles: policies and guidance for the sustainable management of the historic environment* (English

Heritage 2008), *The Setting of Heritage Assets* (Historic England 2017), *Seeing History in the View* (English Heritage 2011), *Managing Change in the Historic Environment: Setting* (Historic Scotland 2016), and with reference to *Visual Assessment of Wind Farms: Best practice* (University of Newcastle 2002) and *Guidelines for Landscape and Visual Impact Assessment* 3rd edition (Landscape Institute 2013). The site visit was undertaken by Emily Wapshott on 5th July 2022.

2.0 HERITAGE IMPACT ASSESSMENT

2.1 HERITAGE IMPACT ASSESSMENT - OVERVIEW

The purpose of heritage impact assessment is twofold: Firstly, to understand – insofar as is reasonably practicable and in proportion to the importance of the asset – the significance of a historic building, complex, area, monument or archaeological site (the 'heritage asset'). Secondly, to assess the likely effect of a proposed development on the heritage asset (direct impact) and/or its setting (indirect impact). The methodology employed in this assessment is based on the approach outlined in the relevant DoT guidance (DMRB LA 104 2020), used in conjunction with the ICOMOS (2011) guidance and the staged approach advocated in *The Setting of Heritage Assets* (GPA3 2nd Ed Historic England 2017). The methodology employed in this assessment can be found in Appendix 3.

2.2 NATIONAL POLICY

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

Paragraph 194
In determining applications, local planning authorities should require the applicant to describe the significance of any heritage assets affected, including the contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should be consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which a development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Paragraph 195
Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

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

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

In addition, the Ancient Monuments and Archaeological Areas Act 1979[1], the Protection of Wrecks Act 1973[2], and the Historic Buildings and Ancient Monuments Act 1953[3] also contain relevant statutory provisions. Unitary councils, county councils, and district councils usually have

[1] https://www.legislation.gov.uk/ukpga/1979/46/contents.
[2] https://www.legislation.gov.uk/ukpga/1973/33/contents.
[3] https://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents.

local policies and plans, based on national guidelines, which serve to guide local priorities.

2.3 LOCAL POLICY

The following policy from the Wiltshire Core Strategy adopted 2015 applies to this proposed development.

Core Policy 58: Ensuring the conservation of the historic environment

Development should protect, conserve and where possible enhance the historic environment. Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including:
i. nationally significant archaeological remains
ii. World Heritage Sites within and adjacent to Wiltshire
iii. buildings and structures of special architectural or historic interest
iv. the special character or appearance of conservation areas
v. historic parks and gardens
vi. important landscapes, including registered battlefields and townscapes.

Distinctive elements of Wiltshire's historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced. The potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping). Heritage assets at risk will be monitored and development proposals that improve their condition will be encouraged. The advice of statutory and local consultees will be sought in consideration of such applications.

2.4 STRUCTURE OF ASSESSMENT – DIRECT AND INDIRECT IMPACTS

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

2.5 DEVELOPMENT PROPOSALS

The proposed development comprises the installation of a new sewerage system along with some additional drainage and a soakaway.

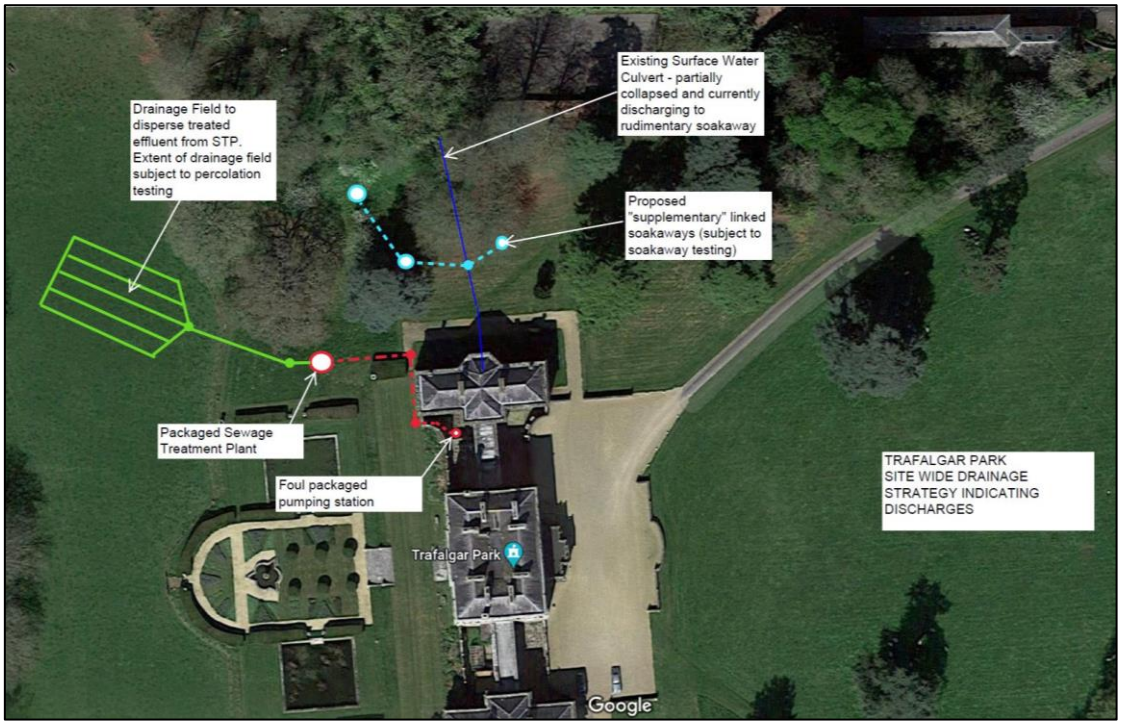

FIGURE 2: PROPOSALS SHOWING LOCATION OF NEW SOAKAWAY AND SEWERAGE SYSTEMS (PROVIDED BY THE AGENT).

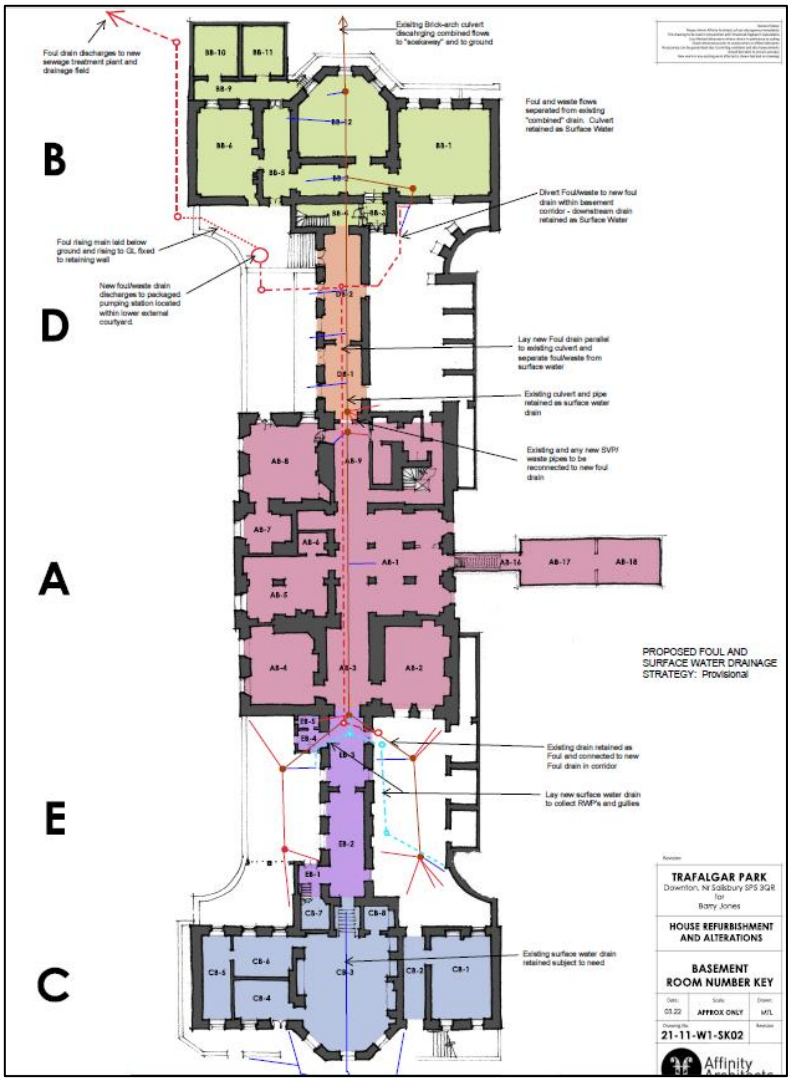

FIGURE 3: PLAN SHOWING ADDITIONAL AND RETAINED DRAINAGE AROUND THE PROPERTY (PROVIDED BY THE AGENT).

3.0 DIRECT IMPACTS

3.1 STRUCTURE OF ASSESSMENT

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

3.2 DOCUMENTARY HISTORY

The site lies in the parish of Downton, although for some of its history comprised a parish in its own right. It was documented as a settlement at Domesday under three land holders: William of Falaise, Waleran the hunter and Alwy son of Turber. Alward was lord of the portion held by William of Falaise. The descent of the three portions in the later medieval period is not entirely clear (VCH 1980) however by the mid 15th century it appears all three were united under the ownership of Henry Hugyn. By 1543 it was conveyed by his descendants to William Green for a rent of £5 a year until he purchased the manor in 1551. The reversion was sold to Walter Buckland by Francis, son of William Green and he was in possession by 1587. Particulars of Standlynch manor recorded after the death of Philip Buckland (or Bockland) Esq. in the late 17th century records the house with stabling for 24 coach horses, gardens well planted with fruit trees, an avenue leading to the house and two large well stocked fish ponds along with 'beautiful walks through flat ground of the home gardens' (Wiltshire and Swindon Archives 490/1068). Philip Buckland's brother and heir sold Standlynch manor to Sir Peter Vandeput Bt in 1726. He was responsible for the construction of the present house. The manor was sold by his son in 1752 to William Young who sold it in 1766 to Henry Dawkins. Dawkins enlarged the house to its present form, adding the north and south wings to designs by John Wood and with decoration by Nicholas Revett, who also designed the porch. It was at this date that Cipriani also undertook the decoration of the parlour at the south east corner. Standlynch House was purchased in 1815 by the Crown for the heirs of Vice-Admiral Horatio Nelson, Viscount Nelson and renamed the Trafalgar Estate. It was initially held by the brother of Horatio Nelson, as Nelson had no legitimate heirs and descended through the family until it was permitted to be sold by the Trafalgar Estates Act 1947. It was then sold in 1948 to John Francis Godolphin, Earl of Leeds and then in 1953 to Jacob Pleydell-Bouverie, Viscount Folkstone who succeeded as Earl of Radnor in 1968 (VCH 1980). The estate then comprised part of the Longford estate until it was sold in 1958 to Associated Electrical Industries Ltd and then in 1961 to Oliver Lyttelton, Viscount Chandos. It was sold again in 1971 to Mr Pinckney, in 1992 to Mr Gunnar Bengtsson then in 1995 to Michael Wade. The estate has recently changed ownership again.

The village at Standlynch was located in the southwest corner of the parish, close to the river Avon. By the 17th century the village was recorded as comprising the manor house, church, farmstead and mill and by the 18th century it appears the settlement was scattered (VCH). A new farmstead was constructed near water meadows to the north of Standlynch and Standlynch House (later Trafalgar House then Trafalgar Park) was constructed in 1733 on higher ground northeast of the village. It had originally been proposed to construct a new house in a location near to the original manor house by the river and plans were drawn up by the architect John James. The location of the new house was changed as construction began to the higher ground where it now sits, although the design remained the same, and the land surrounding it was

emparked at this date. The settlement of Standlynch was abandoned at this date, with the manor house and farmstead demolished; new farmsteads were constructed east of the road to Downton. The wilderness gardens of the old Standlynch Manor House became the walled kitchen garden for Standlynch House.

Gardens at Standlynch were designed in the mid-1730s by Charles Bridgeman (Figure 4). Drawings attributed to Bridgeman are held at the Bodleian Library and show surveys/designs for the new house and gardens close to the river. It is unknown exactly how much of these gardens were ever built although it is suggested that there is some earthwork evidence in the area of the possible amphitheatre. A linear band of tree planting shown at the northern extent of the garden design does appear to correlate with an extant east-west band of trees to the north of the present house. A full earthwork survey of this site would be required to fully understand the extent to which the garden designs were carried out. It is also unclear to what extent gardens were laid out around the house once its position had been moved away from the river to its current location and if the garden design there was also undertaken by Bridgeman. A map of 1779 documenting the new layout of the park as part of the survey of Henry Dawkins estates in Wiltshire is held at the British Library map room (Brushe 1993). This map was not viewed as part of this assessment and therefore it is not known whether it shows any detail of gardens around Standlynch House.

An 1817 plan of the manor of Standlynch shows the house and stables along with the walled garden by the river but no gardens around the house are shown. This map appears to be for the purposes of administering the estate and therefore the lack of illustration of gardens around the house is not indicative of their absence as no driveway or entrance across the house is shown on this map either (Wiltshire & Swindon Archives 464/81). William Butterfield is recorded as remodelling the formal gardens in 1859 to their present format, having been commissioned to restore Standlynch Church, possibly utilising the original garden plan. Willis (2002) records the gardens before Bridgeman's alterations as running to south and west of the new house and to the north, separated by two lines of trees was 'an extensive formal garden criss-crossed with diagonal paths' (Parksandgardens.org 2022). The Historic England listing for the gardens states that Bridgeman proposed a wilderness garden to the north of the house with a central clearing, planted in part of the old formal garden. A winding carriageway through this took in four of five geometrically shaped look out points or glades (Historic England 2022). It is possible there is some confusion in the meaning of the 'new house' i.e., whether it was the new house proposed by the river or the new house on the hill. Given the documentary evidence available it is not possible to conclusively determine the extent and form of the post medieval gardens at Standlynch/Trafalgar House.

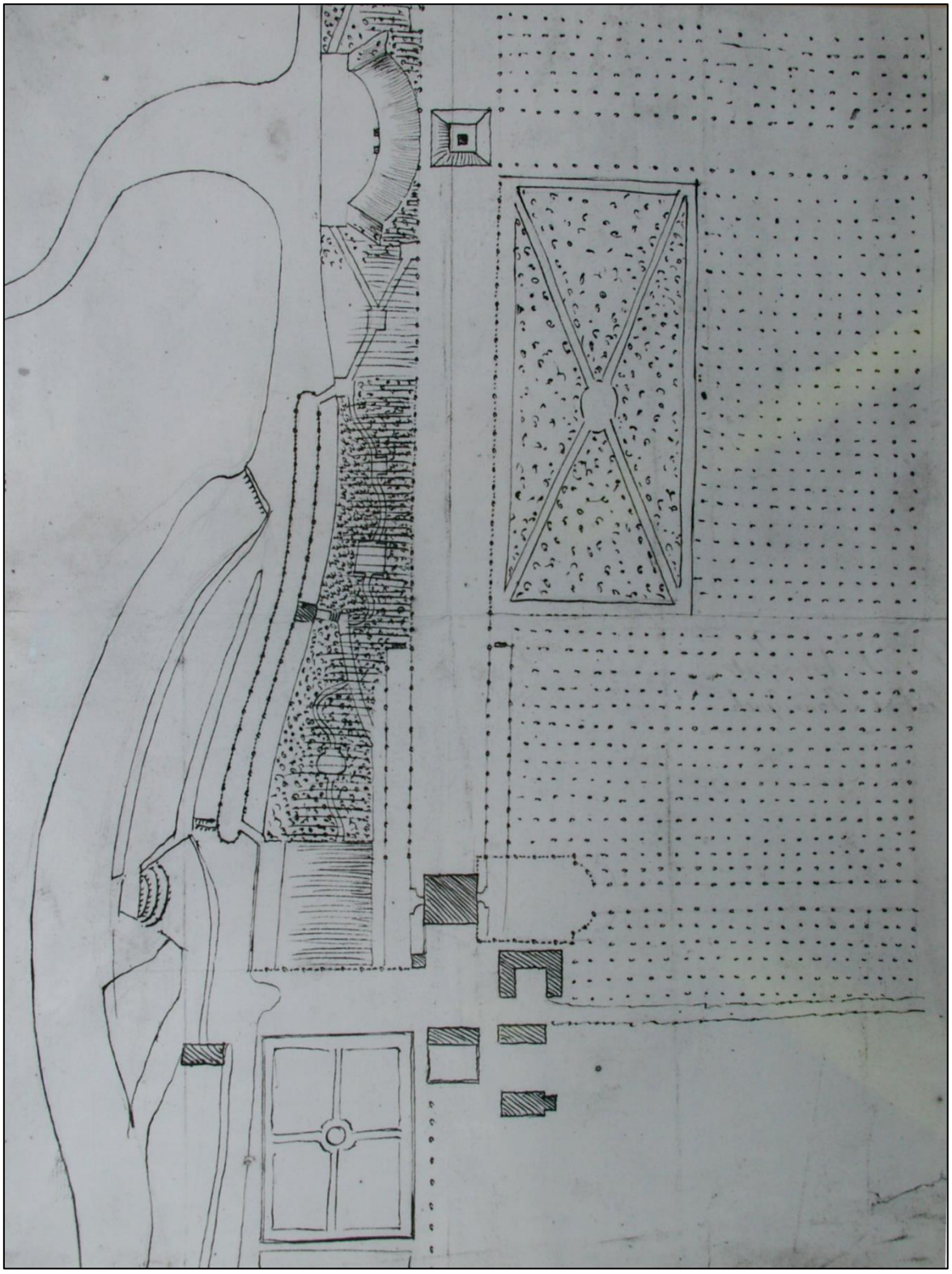

FIGURE 4: DRAWING C.1731 ATTRIBUTED TO BRIDGEMAN SHOWING PROPOSAL FOR NEW HOUSE AND GARDENS BY THE RIVER (PHOTOGRAPHED FROM DRAWING IN COLLECTION OF THE CLIENT; BODLEIAN LIBRARY GOUGH DRAWINGS A3 FOLIOS 24, 25, 36).

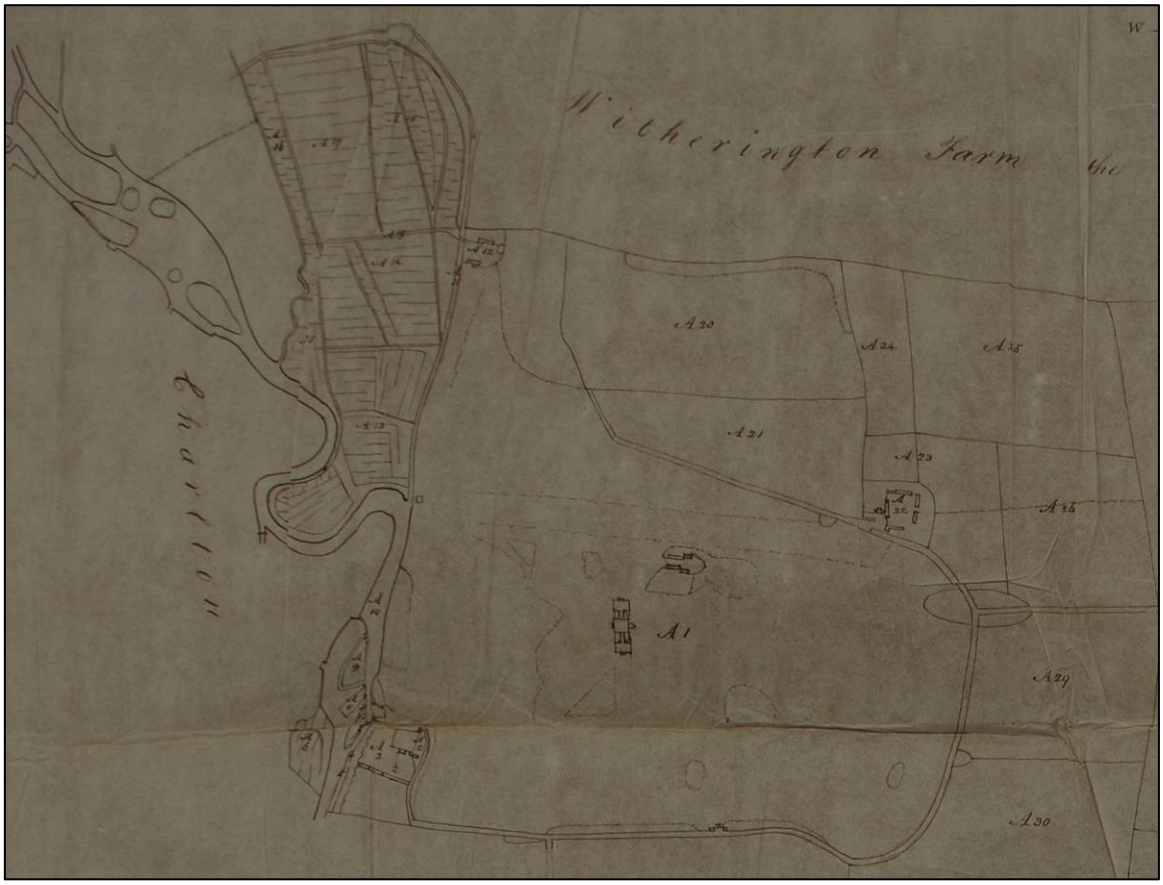

FIGURE 5: 1817 ESTATE PLAN SHOWING BUILDINGS FORMING PART OF THE TRAFALGAR ESTATE BUT WITH NO DEPICTIONS OF GARDENS, PATHS OR DRIVEWAYS SUGGESTING THIS PLAN WAS FUNCTIONAL AND USED FOR ESTATE ADMINISTRATION (WSA 464/81).

3.3 CARTOGRAPHIC DEVELOPMENT

The first available map to show the site is the 1807 Ordnance Survey Draft Maps for Salisbury (Figure 6). Standlynch House is labelled, with is north and south wings clearly illustrated. The former site of Standlynch Manor and the church is visible to the southwest of Standlynch House, depicted as a small collection of buildings with a road or pathway running around. Some lines of tree planting are shown around Standlynch House, along with tree clumps along its eastern entry route. Although indistinct on this map there appears to be some suggestion of paths running between the house and the buildings to the northeast, and from the north of the house westwards towards the plantation and the river.

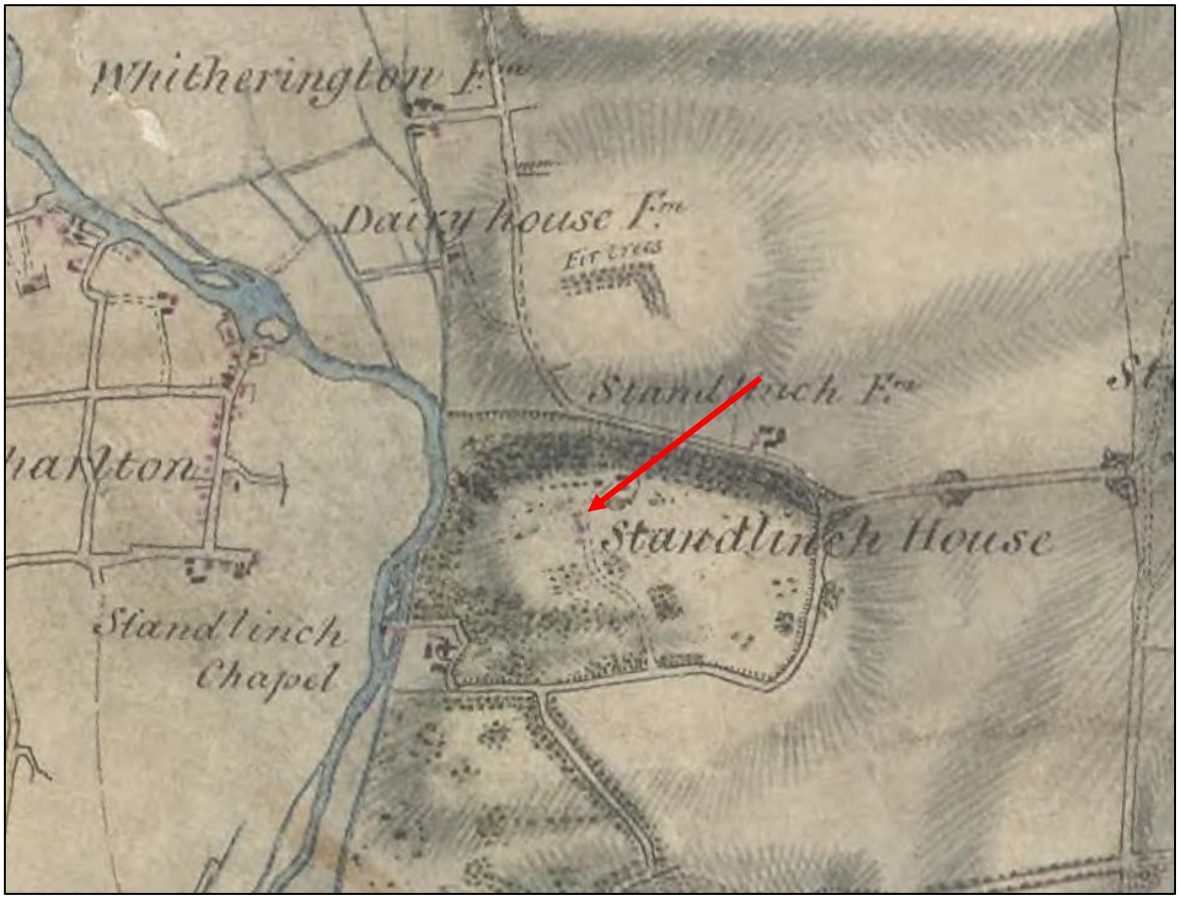

FIGURE 6: EXTRACT FROM 1807 SURVEYORS DRAFT MAPS FOR SALISBURY (BRITISH LIBRARY) THE APPROXIMATE SITE LOCATION IS INDICATED.

The Tithe map (Figure 7) shows that at the date of the tithe survey Standlynch was still a parish in its own right. The tithe map depiction is very similar to the 1817 manor plan (Figure 5) and shows the house (renamed Trafalgar House by this date) but little of the gardens around it; no formal gardens are illustrated, possibly because they were not of relevance to the tithe survey and there is little depiction of formal gardens accompanying other houses on tithe maps in this area. The map shows the house and park as plot 3, with plots 4 and 5 comprising plots within the former settlement of Standlynch. The Tithe Apportionment (Table 1) shows the ownership by Earl Nelson but shows the occupier as Silas Benjafield and others. The 1841 census shows Silas Benjafield was a 45-year-old Yeoman who lived at Standlynch with his wife and family. It is possible he was the farmer at Standlynch Farm and is shown as the occupier due to the land around Standlynch House being included as one plot with the park and surrounding farmland. Horatio, Earl Nelson appears not to have been resident at Standlynch at the date of the census however he would have still been a minor, having inherited the estate in 1835 at the age of 12.

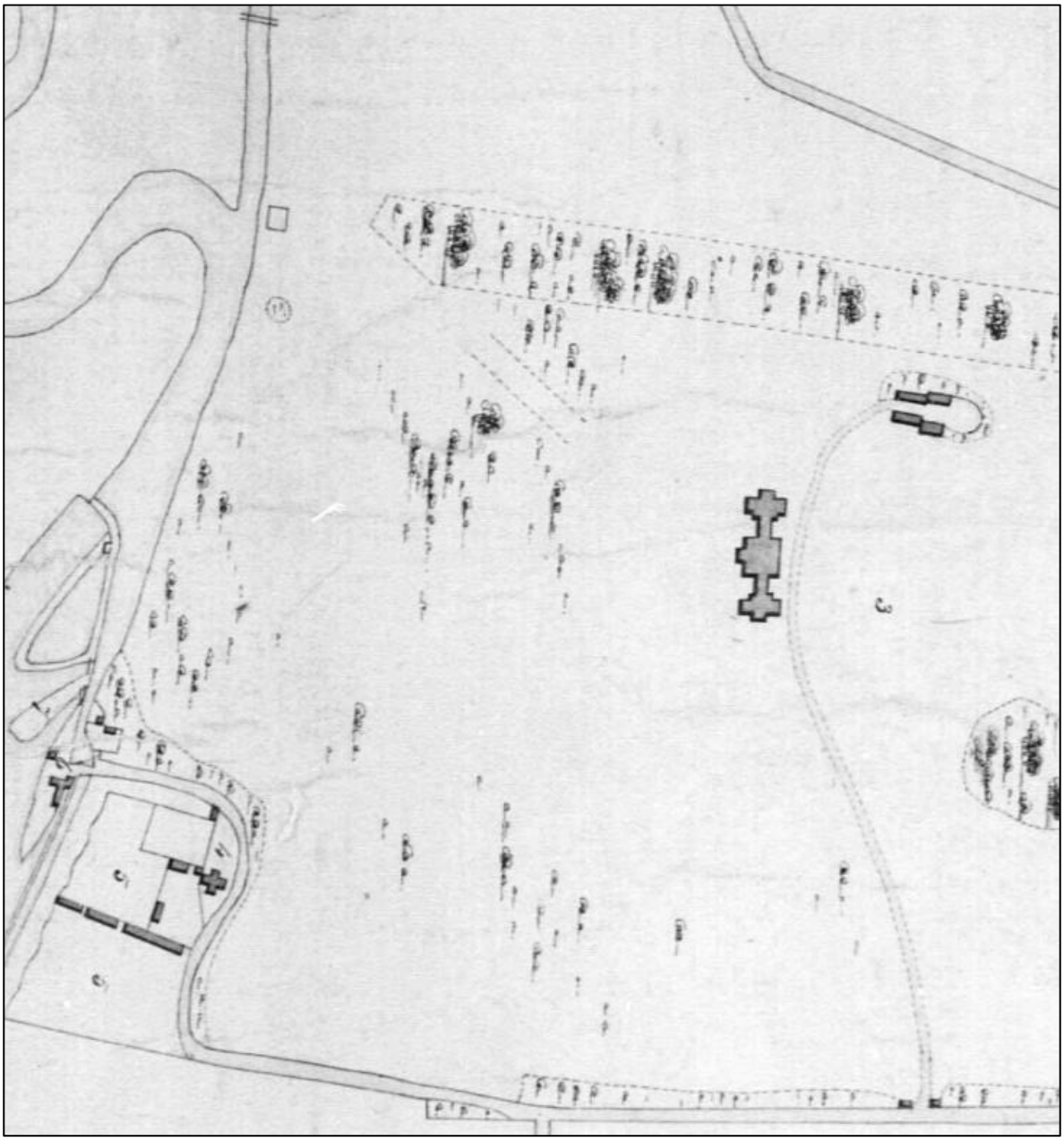

FIGURE 7: EXTRACT FROM THE TITHE MAP FOR STANDLYNCH (TNA).

TABLE 1: EXTRACT FROM THE 1840 TITHE APPORTIONMENT FOR STANDLYNCH (TNA). THE SITE PLOTS ARE SHADED GREEN.

Plot	Owner	Occupier	Name	Cultivation
3	The Right Honorable Horatio Earl Nelson	Silas Benjafield and others	Trafalgar House, Park and Plantations	-
4			The Chapel and Chapel Yard	-
5			The gardens and shrubbery	-

The First Edition Ordnance Survey map surveyed 1876 (Figure 8) shows the house and gardens in detail with the formal gardens to the west of the house illustrated following their redesign by William Butterfield. A path can be seen around the outer edge of the formal garden, curving at the north and south to follow the line of the ha-ha. Dense tree planting is also visible on this map with a line of trees running along a path extending westwards from the formal gardens and smaller avenues of trees running along the paths extending north and south from the formal garden. By the end of the 19th century (Figure 9) much of this tree planting appears to have been removed, with only the avenue extending eastwards retaining its form although possibly

replanted to broadleaf species. This appears to have largely gone by the early 20th century (Figure 8) and the path extending immediately north from the north wing is also no longer shown.

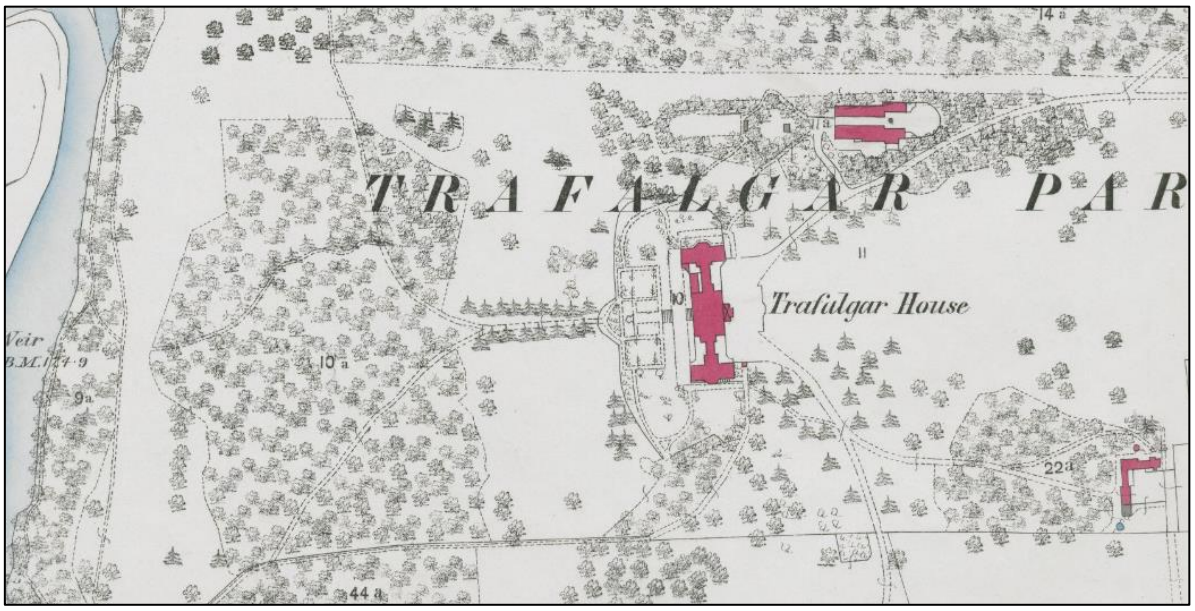

FIGURE 8: EXTRACT FROM THE ORDNANCE SURVEY FIRST EDITION 25 INCH MAP SURVEYED 1876 (NLS).

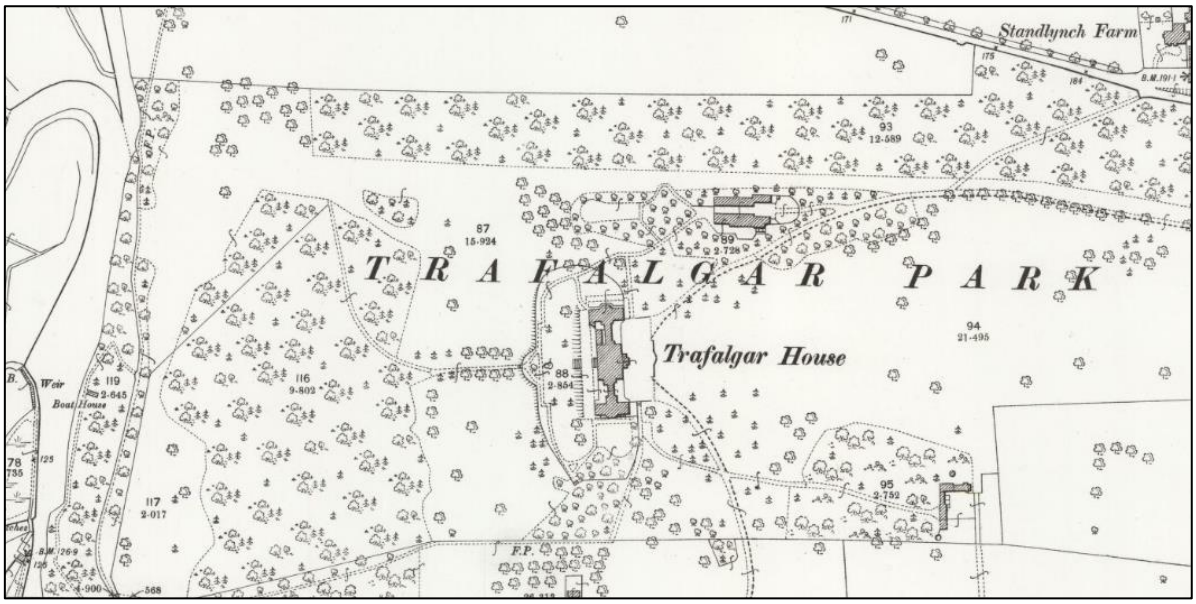

FIGURE 9: EXTRACT FROM THE SECOND EDITION 6 INCH ORDNANCE SURVEY MAP, SURVEYED 1899 (NLS).

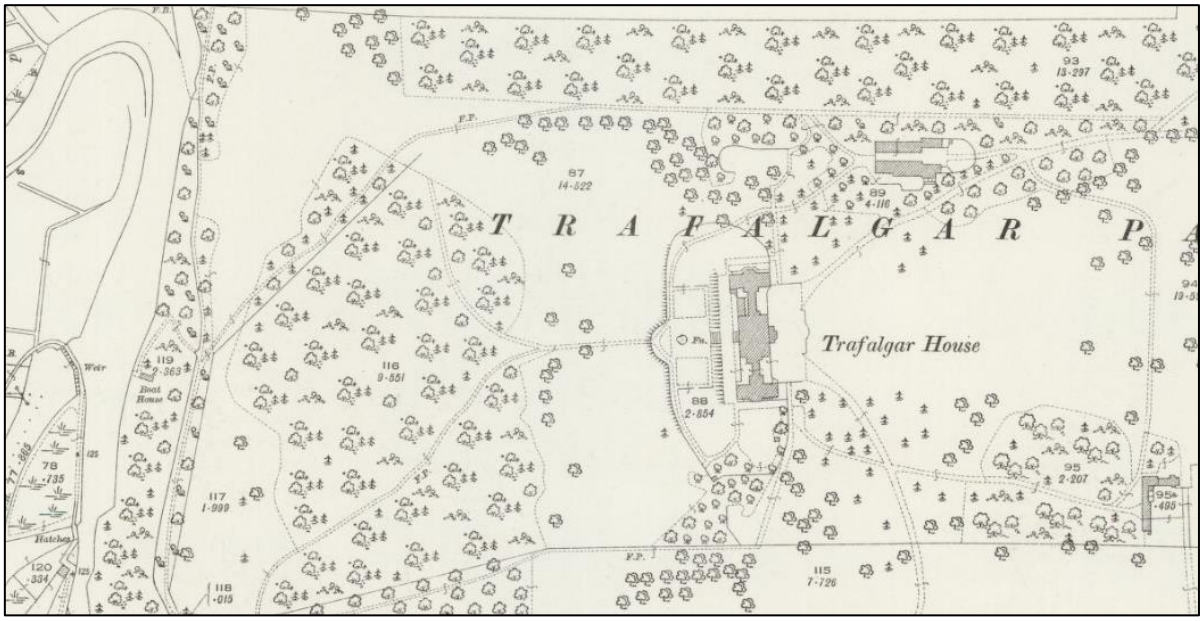

FIGURE 10: EXTRACT FROM THE REVISED SECOND EDITION ORDNANCE SURVEY 25 INCH MAP, REVISED 1925 (NLS).

3.1 DESIGNATED HERITAGE ASSETS

The proposal site is located at Trafalgar House, a Grade I Listed Building. It also lies within the Trafalgar House Grade II Registered Park and Garden. A number of other Grade II Listed buildings are located within the vicinity of the area of proposed works.

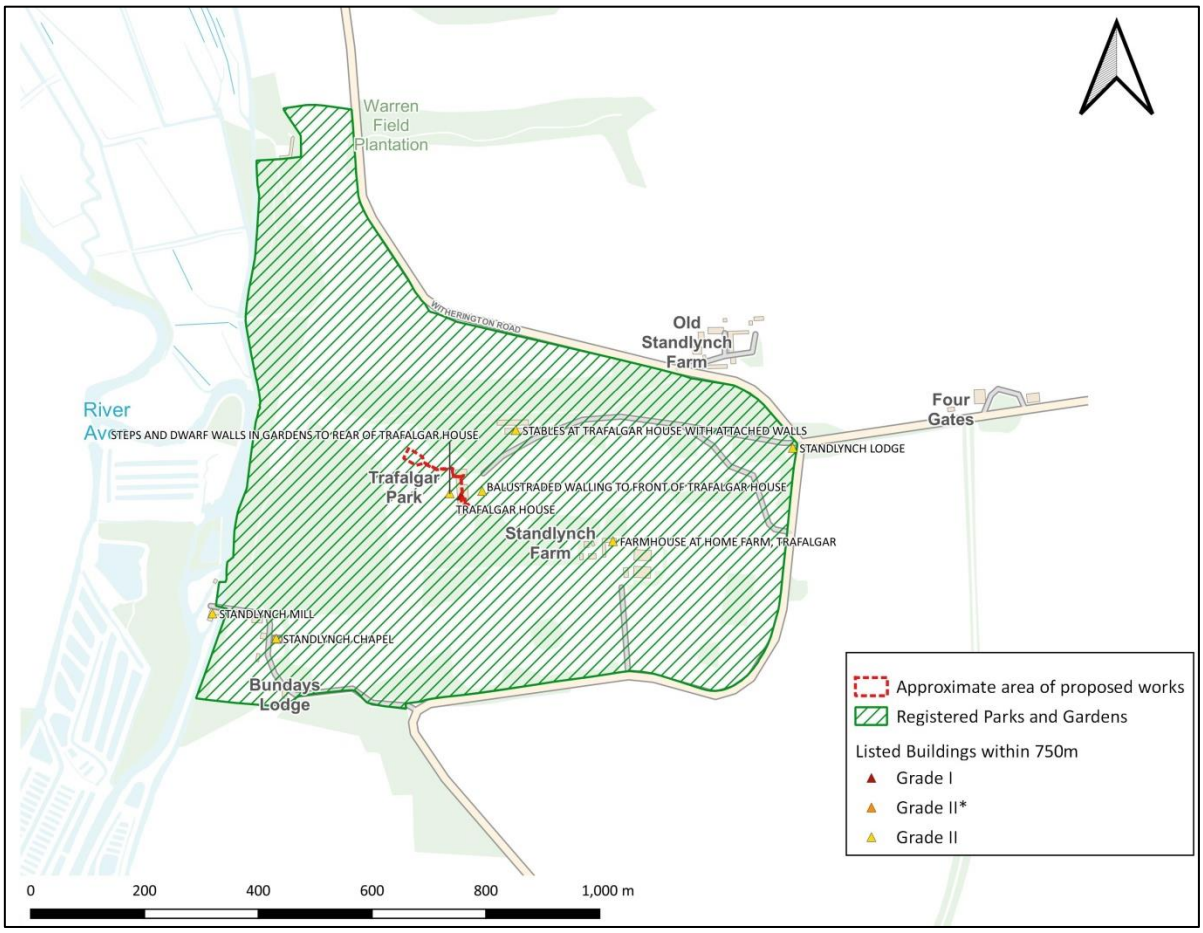

FIGURE 11: DESIGNATED ASSETS WITHIN 750M OF THE PROPOSAL AREA RECORDED IN THE NHLE ENGLAND DATABASE (SOURCE: HISTORIC ENGLAND) CONTAINS ORDNANCE SURVEY DATA © CROWN COPYRIGHT AND DATABASE RIGHT 2022.

3.2 AERIAL PHOTOGRAPHY AND LIDAR

A review of readily available aerial photographs shows some changes within the proposal area in the second half of the 20th century. Aerial images from 1947 (not illustrated) show two shrubberies or tree clumps to the north of the formal gardens which have subsequently been removed. At present the area of the proposed works is largely lawn, with the ha-ha still visible around the western edge of the formal gardens.



FIGURE 12: AERIAL PHOTOGRAPH FROM 2020 © GOOGLE MAPS. THE APPROXIMATE SITE IS INDICATED IN RED

The images below are derived from LiDAR data freely available from the Environment Agency. Both surface (DSM) and terrain (i.e., bare earth, DTM) data were processed however due to extensive tree cover inhibiting visibility of the site only the DTM images are presented below. The highest sampling interval available for the site was a 1m interval so the images are therefore unlikely to indicate the presence of small features on the ground.

Although the ha-ha and formal gardens present as strong features, there are no other clearly visible features within the area of the proposed works. This may in part be a result of the sample interval and extensive tree cover in some areas rather than an indication of a lack of features.

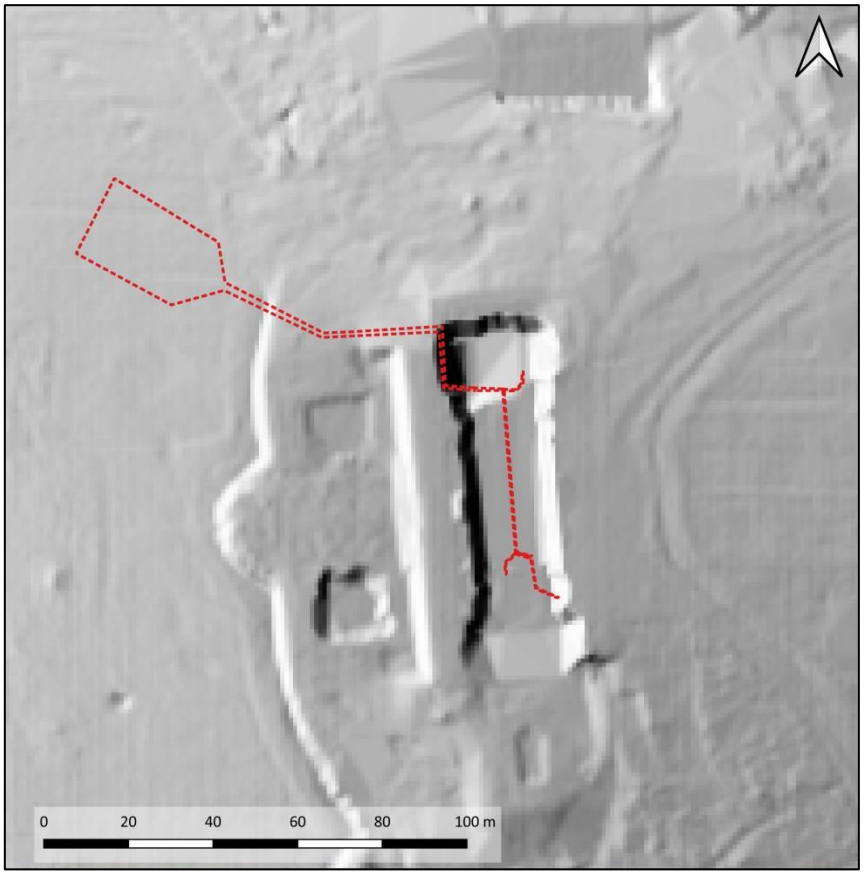

FIGURE 13: 1M LIDAR DTM PROCESSED USING QGIS 3.16 MULTIHILLSHADE 315_35_2. THE APPROXIMATE SITE IS INDICATED IN RED. CONTAINS PUBLIC SECTOR INFORMATION LICENCED UNDER THE OPEN GOVERNMENT LICENCE.

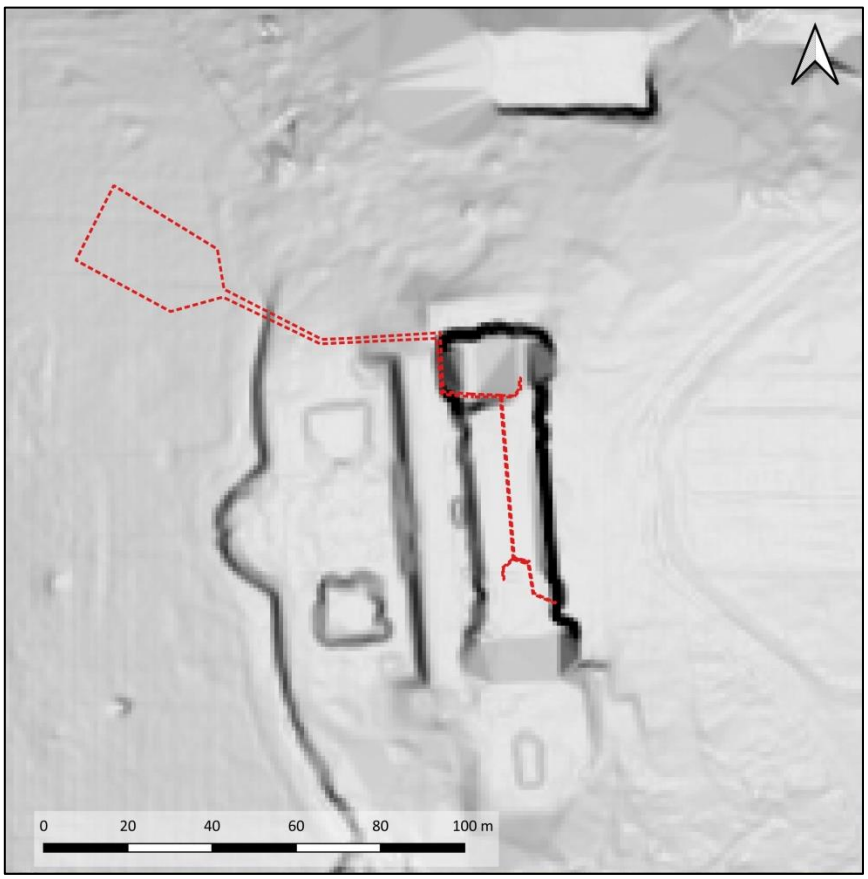

FIGURE 14: 1M LIDAR DTM PROCESSED USING QGIS 3.16 SLOPE Z2. THE APPROXIMATE SITE IS INDICATED IN RED. CONTAINS PUBLIC SECTOR INFORMATION LICENCED UNDER THE OPEN GOVERNMENT LICENCE.

3.3 WALKOVER SURVEY

A walkover survey of the site was undertaken on the 5th of July 2022 in sunny and dry conditions by Emily Wapshott, MCIfA. The site is in ongoing, unchanged use as part of the formal pleasure grounds of Trafalgar House.

Site description – Garden North of North Pavilion

The garden north of the north pavilion has a gravelled walk parallel with the railing to the brick walls of the sunken basement, beyond this is a gentle but defined slope, with mature grass sward, which sows some drying and parch-marking, which appears to be the remains of another section of raised earthen parterre, as is seen to the west garden front. The presence of this parterre appears to be confirmed early, mid-20th century aerial photographs of the house, (example included below). The parterres to the west have been shown through survey to merely be packed earth and flint/chalk, so it appears very likely this has merely weathered through a lack of maintenance and consequently slumped, losing all definition. These photographs appear to show the Ha-ha also curving around to the north side of the house and even continuing on to the east enclosing the main lawns in front of the main approach to the house with a ditch; the Ha-ha appears to be very well defined in the images on the west and north sides and may have been a bank of packed chalk in this period, since overgrown.



FIGURE 15: EARLY-MID 20TH CENTURY PHOTOGRAPH OF THE HOUSE AND INNER PARK, SHOWING CONTINUATION OF THE HA-HA AND PARTERRE AROUND THE NORTH SIDE OF THE HOUSE, AND EVEN SEEMINGLY A HA-HA TO THE EAST (AS SUPPLIED BY AGENT, FROM CLIENT'S PERSONAL ARCHIVE).

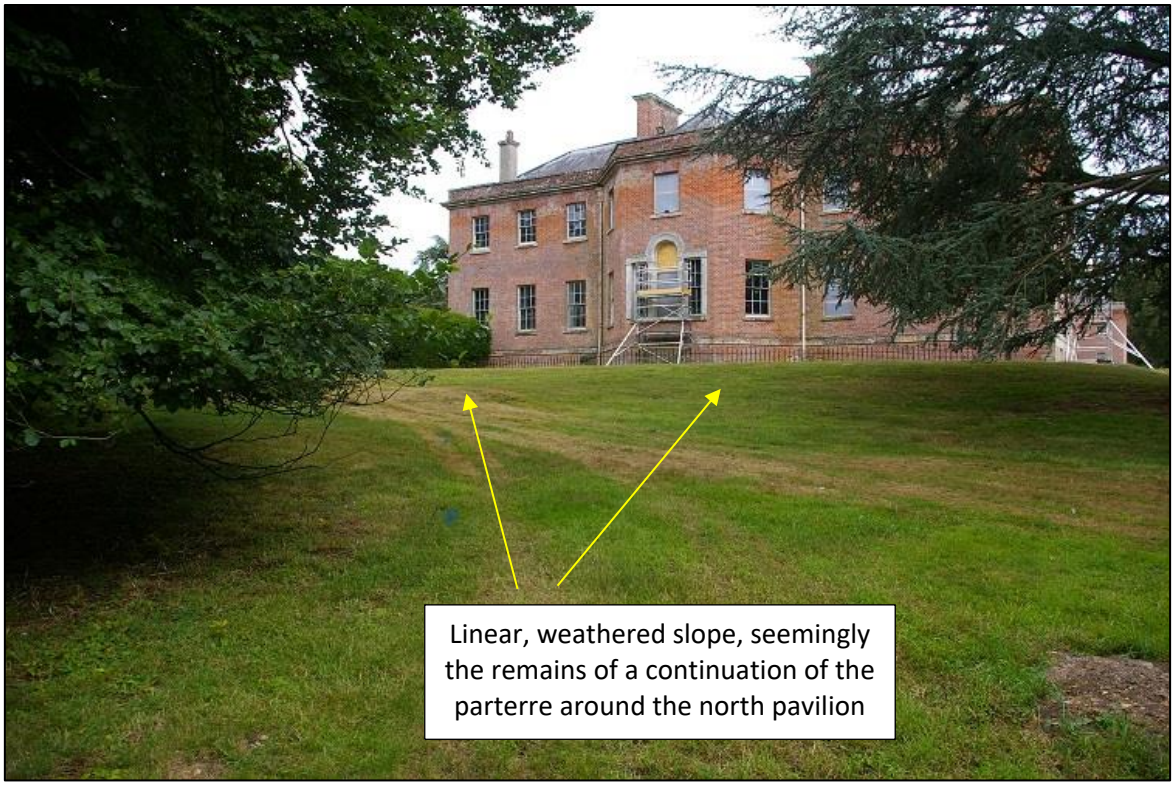

FIGURE 16: VIEW LOOKING BACK TO THE NORTH PAVILION, SHOWING ROUGH LINE OF THE SLUMPED FORMER PARTERRE; FROM THE NORTH-WEST.

Below the parterre the grass continues, with slight indents or raised areas around certain of the mature specimen trees, associated with their roots. To the north-west corner, where there is a large conifer, which is not visible on the historical photographs, there is a defined sub-rectangular depression, with straight sides, which may have been a formal border, for planting, this has since overgrown, it is to be noted that this feature is not shown in use/present on the earlier photograph either and cannot be spoil from the altered parterre, as it is too far north. As with the sunken borders to the west, there is no built form associated with such features and they can quickly become ephemeral, if it is a border from an earlier phase of garden, it is from a known and quantified phase of the site and it is unlikely it requires further investigation. This feature also lies c.7-8m to the west of the line of trenching however from the north pavilion and is c.4-5m north-east of the soakaway trench-line, so is unlikely to be impacted by either phase of works but the location of such features should be noted, to ensure they are not tracked across by plant undertaking the works. Further north two tree-boles, sites of former parkland trees can be identified, and the LiDAR suggests there may be more of these. There is a slight natural slope to the north-west. The continuation of the Ha-ha could not be identified on the ground and may lie just beyond the current densely packed treeline, which is fenced. The ground works may just breach the historic line of this Ha-ha, or may just fall short, it would make sense that the historic Georgian culvert would run at least as far as the Ha-ha, it would certainly not fall short of it.

To the north-west the terminated west parterre suggests 20th century alterations to the garden design and therefore the ground will already have been disturbed; the parterre itself is earthen and does not appear to evidence any built form. The slope beyond running out to the Ha-ha is gently and evenly sloping, with no evidence of any earlier features. The trench line will then breach the Ha-ha as it begins to currently drop back to ground level, clearly landscaped away for a stretch of about 20-30m where modern fencing and gates define the difference between parkland and garden, the parkland used for grazing cattle and requiring access. At this point the Ha-ha presents as merely being an overgrown grass bank, without the usual associated ditch, it is fenced

for stock-proofed as such, with modern post and wire fencing as it can no longer perform its function.



FIGURE 17: THE POSSIBLE SUB-RECTANGULAR FEATURE OFF THE NORTH-WEST CORNER OF THE WEATHERED PARTERRE; FROM THE NORTH.



FIGURE 18: EXAMPLE OF A SHALLOW HOLLOW WHERE A PARKLAND TREE HAS BEEN REMOVED AT SOME POINT IN THE MORE RECENT PAST, AS IT IS NOTED ON THE HISTORIC PHOTOGRAPHS; FORM THE WEST.



FIGURE 19: THE AREA TO BE USED FOR THE SOAKAWAY TRENCHING, SHOWING NORTH END OF THE WEST PARTERRE AND GRASSY SLOPE TO THE HA-HA; FROM THE WEST.

Site description – Field, north-west of Ha-ha

The field in question occupies the crest of a gentle west and north-west facing slope, with long vistas down to the Avon River valley. To the north is a strikingly straight band of trees, presumably historic parkland planting, which enclose the house and gardens, screening all views in and out and creating privacy for the hilltop location. To the north-west there is a small copse of more mature parkland trees, including a silver birch, copper beech, amongst others, just set out into the grass pasture, again this looks to be historic parkland planting. To the west there is densely planted woodland, with again a small copse of trees projecting into the grassland, which appear more mature and present very much as a parkland 'clump', again with a statement copper beech tree. Within this western woodland there is the remains of an overgrown former avenue, likely creating a long view down to the river, with an obelisk or similar, at the end, also now overgrown, on the edge of the woodland. Interestingly this avenue does not really align with the orientation of the house, although broadly opposite the formal gates into the gardens; the vista down the avenue would have been compromised as a result. To the east is the earthen Ha-ha which curves around to the south-east, where a set of brick and terracotta steps and iron gates leads into the formal gardens, the low Ha-ha has rather worn away over time and any associated ditch has silted up, so the feature is now fenced, with modern post and wire, to keep in the cows which graze the pasture. Unusually this Ha-ha does not seem to have any built form, within it that is obvious but structural surveys of the parterres near the house also exhibit the same packed earth and chalk/flint form, without seemingly much formalised structure to support it. To the south the grassland runs down in naturalised sweeping forms to the chapel and historic former manor house site. The current woodland planting has effectively created two wider avenues to the north-west and south-west, providing radiating distant views out of the immediate setting, which is otherwise quite enclosed. The character of the parkland, whilst clearly heavily planted for woodland in a later period has the typical picturesque, English school feel of simplified 'perfected nature' with lots of grassland and meadow, with no evidence of formalised designs outside of the small area to the west and south of the house.



FIGURE 20: THE EARTHEN HA-HA BETWEEN THE GARDENS AND PARKLAND, NOW QUITE WEATHERED, IT HAS BEEN FENCED TO KEEP IN THE GRAZING CATTLE; FROM THE WEST-SOUTH-WEST.



FIGURE 21: THE PROPOSED LOCATION OF THE SOAKAWAY, SHOWING A GENTLY SLOPING AREA OF MATURE GRASS SWARD; FROM THE SOUTH-EAST.

The proposed location of the soakaway is laid to mature grass sward, which presents some minor animal divots, with some thistles and docks but no evidence of positive-profile earthworks or

parch-marks associated with below ground features. Where some geotechnical pits had been excavated the backfilled soil appeared to be dry, loamy and fryable, of a soft, grey-brown colour, with a mix of gravel and flint/chert inclusions, over chalk bedrock. The soil in this location appears markedly shallow, with the topsoil being a slightly darker brown colour, with smaller stones and grit/gravel and subsoil being stonier, with a total over-burden of, on average less than 200-300mm above bedrock. The geotechnical report undertaken before this brief walkover would provide more detailed evidence on the makeup of the soil profile in this area. Where there are a few negative-profile sub-circular scoops in the earth, to the north of the soakaway site, near the fenced treeline, these were examined and appear to be former tree-boles, where former parkland trees have fallen or been removed, it is noted that a couple of these, which are more substantial, show up on the LiDar in this location. There is a cement water trough in the field just beyond the proposed location of the soakaway and if this is pipe-fed then the area will have already been significantly disturbed, any archaeological deposits damaged.



FIGURE 22: VIEW BACK TO THE HOUSE, ACROSS THE PROPOSED SITE OF THE SOAKAWAY; FROM THE NORTH-WEST.

3.4 ARCHAEOLOGICAL POTENTIAL

The direct *effect* of the development would be the possible disturbance or destruction of archaeological features or deposits present within the footprint of the development and along the line of the trenching; the *impact* of the development would depend on the presence and significance of archaeological features and deposits. Assessing the archaeological potential of the site is complex, the issues have been broken down into a simple list below, to clarify what we do and do not know, at this evaluation stage:

- There is no physical evidence present above ground of archaeological deposits in the location of the soakaway (no earthworks, no parch-marks).
- There is evidence of some minor earthwork forms north of the north pavilion which may be associated with the continuation of the earthen parterre, as possibly evidenced on Historic England photographs. If so, these are remains of a well-known and researched mid-19th century formal garden, executed in an earlier 18th century style. There is little to no built form in the other parterres, with only a few sets of steps and dwarf walls to the west.
- There is no evidence on the LiDAR of significant below ground remains in the field, in the location of the soakaway and where some small sub-circular features do show, they have been confirmed as tree-boles. The disturbed parterre to the north of the north pavilion also shows as an earthwork, no other features of interest can be seen.
- The Ha-ha can be seen on early 20th century photographs to continue to the north in a broad sweep; this does not appear on the Lidar or modern aerial photographs, but this could be due to the tree cover. This was not seen as a defined feature during the walkover but may survive within the dense tree planting to the north of the open grass area, in which case it would not be expected to be affected by the works.
- There are supposed documentary references to formal gardens to the north and north-west of the 'new house', but it is also clear that the 'new house' was initially set out to be near the original manor house and chapel and the move to the top of the hill was an afterthought, it may be that the gardens started to be laid out alongside the river before the house was moved.
- There is no above ground evidence for complex formal gardens north of the current house. The pavilions were also added in 1766, so it is likely the north pavilion and wing would have obliterated any gardens, immediately adjacent to the main block of the house, had they been laid out.
- The historic mapping lacks clarity and detail, merely showing sections of woodland and a few parkland clumps; none of the 18th or 19th century maps indicate formal gardens surviving to the north of the current house's location. Some of the clumps and copses and the wide, linear plantation of trees to the north are recorded on the mapping and survive today, this could strongly suggest that the many complex garden designs were never replicated at the new hilltop site, and this was merely naturalised parkland and woodland.

What we can therefore conclude is that it is unlikely that there are any remains of historic formal gardens in the areas to be affected by the proposed works and that there is no evidence of earlier buildings or gardens being on this upper hilltop site, all earlier historic activity seemingly in the valley, near the river, where the medieval village was located. This does not preclude undocumented prehistoric activity or individual finds being located; it is believed a scattered find

of a few Roman coins were found on the estate in the past (*pers comm* current owners). *Absence of evidence* is not of course *evidence of absence*, however it is felt that the archaeological potential of the site is probably medium for the garden and low for the field, although we likely need to assess the formal archaeological potential as *'unknown'* due to the data gaps.

The proposed development will require fairly extensive trenching, depending on the depth of the trenches to ensure correct fall for drainage, there is technically the potential to encounter archaeological remains from the post medieval period, within the made ground of the former parterre (occupation deposits from the use of the house, pottery, bottles etc) and potentially earlier periods across the whole site. Damage to archaeological deposits, as a result of the trenches would inevitably be considered **permanent/irreversible**. Mitigation could take the form of a limited and proportionate programme of an archaeological watching brief during the commencement of works (topsoil strip) to assess more accurately the need for further monitoring. Whilst this would not prevent the damage to any below ground deposits, it would allow for their recording and interpretations, which could further reveal the narrative and therefore enhance our understanding of the significance of the formal gardens and therefore by association, benefit both the park and garden and the house, as heritage assets. Such an approach would also manage the archaeological risk, whilst limiting costs in an area of likely low/medium archaeological potential, considering the overall benefit of improving drainage to a Grade I listed building.

TABLE 2: SUMMARY OF DIRECT IMPACTS.

Asset	Type	Distance	Value	Magnitude of Impact	Assessment	Overall Assessment
Direct Impacts						
Buried archaeological deposits		On site	Unknown – potentially high	Major Adverse	(potential) Large/Very Large	(potential) Large/Very Large adverse
After mitigation						Moderate/Slight Adverse



FIGURE 23: THE NORTH PAVILION, GROUND FLOOR AND SUNKEN BASEMENT WITH RAILINGS, IN THE FOREGROUND THE GRAVELLED PARTERRE; FROM THE NORTH.

3.5 DIRECT IMPACT TABLES FOR HOUSE AND PARK & GARDEN

The exterior drainage/soakaway will also have an archaeological impact within the basement of the house and within the sunken courtyards and park & garden. This has been qualified further in the tables below; no more detail on this is included as it is understood detailed impact will be considered fully as part of a more extensive Heritage Management Plan for the House.

Asset Name: **Trafalgar House**	
Parish: Standlynch, Downton, Wiltshire	*Value*: High
Designation: GI	*Distance to Development*: within building
Description: Listing: (List entry no. 1183796) Country house. 1733 by John James for Peter Vandeput, wings and pavilions of 1766 by John Wood the Younger for Henry Dawkins, second floor added shortly before portico of 1766 by Nicholas Revett. Flemish bond brick with chamfered limestone quoins, wings are English bond, Welsh slate hipped roofs, brick stacks with stone cappings. Central rectangular block with side wings linking two pavilions. 3-storey, 7-bay symmetrical front. Central Doric portico by Revett has pairs of columns of Order of The Temple of Apollo at Delos, projecting pediment and balustraded parapet, double half-glazed doors in Gibbs surround, three 12-pane sashes either side. First floor has seven sashes; all windows with Gibbs surrounds. Modillioned cornice to second floor; seven 6-pane sashes in moulded architraves. Moulded cornice to blocking course. Returns have rainwater heads with date 1733. 5-bay right return has blind windows to left and right, sashes to centre bays same as front. Left return has 3 bays with Sashes same as front and fine Venetian window lighting stairs to centre bay of first floor. Rear of main block has 3 storeys and basement, 7 windows same as front, centre 3 bays break forward with modillioned pediment and central glazed doors with segmental pediment on Tuscan columns, basement has 2-light casements. Linking wings are single-storey with basement and 5 windows; 12-pane sashes. Pavilions have 2 storeys and basements, 3:3:3 bays to fronts at right angles to main block. Centre bays break forward with hipped roof, 12-pane sashes with flat-arched heads, French windows to 3-bay returns and Venetian windows with grooved surrounds and paterae to centre bays of outward-facing fronts, 2-light leaded casements to basements. Hipped roofs with moulded cornices and blocking courses. Interior: Fittings of main block mostly of 1733; open well stairs on south side with 3 turned balusters to a tread and carved spandrels, very fine entrance hall with coved plaster ceiling with rococo decoration, walls with Corinthian pilasters, floral swags and chinoiserie panels, open pedimented doors and fireplace, modillioned ceiling cornice. Saloon in similar style. Room to left of hall has fine painted decoration of c1766 by J. B. Cipriani, depicting allegorical scenes. Other internal decor by Revett, including fine ceiling, in north pavilion. Rococo and classical fireplaces, double doors and doors with fielded panels and central beading. North pavilion refitted early C19, south pavilion entirely refitted following fire of 1866. Estate bought by Treasury after death of Dawkins in 1814 and given to heirs of Admiral Viscount Nelson, in gratitude for his services. The house was then occupied by his brother, 1st Earl Nelson and the name of the house changed from Standlynch House to Trafalgar House. House of 1733 built to replace an earlier house by the river, demolished by Vandeput.	
Conservation Value: The building derives national significance from its historical-associative value with the Nelson family; the estate being gifted to the Admiral's heirs, in 1814, in gratitude for his sacrifice at Trafalgar and renamed Trafalgar House, by his brother. Lesser associational value with banker and merchant Sir Peter Vandeput, who built the 'new house' in 1733 and Jamaican plantation owner Henry Dawkins, who was also MP for Southampton and Chippenham; who enlarged the house, building the wings in 1766 and paying for aggrandisements like the balustrades and portico. The house is architecturally important, associated with architects John James, James Wood, as well as Nicholas Revett, famed traveller, and Greek Revival proponent. Aesthetically pleasing, the house also successfully conveys narrative value with clear structural phasing, illustrative of social change, technological advancement and fluctuation in taste/fashions, also making it high in evidential value. Archaeologically the building will seal beneath, and contain within its structure, evidence of its own construction, but the historic mapping indicates the 1733 house's plot was wholly separate from the earlier site of the manor house, down near the river. There is no communal value, the building is defined by its exclusivity and high status. The building certainly holds some level of symbolic, local landmark status in the surrounding landscape and river valley.	
Authenticity and Integrity: The house is extraordinarily authentic having been retained as a private home since the 18th century, whilst it has the inevitable changes and alterations, such as the addition of lighting, a luggage lift, mains water etc, it retains overwhelmingly uniform Georgian character and its historic phases are easily discernible, even in the basement, a space most vulnerable to change.	
Setting: The house sits within gardens and pleasure grounds of approximately 1ha, with wooded and grass parkland beyond, much now used agriculturally, collectively approximately 65ha. The house is flanked to the east by a rectangular courtyard, enclosed by brick balustrades, with gravelled parking areas, to the west a stepped grass parterre leads down to a formal garden, with rectangular pools to north and south, framed by yew hedges. To the south a formal lawn now has the addition of a 20th century swimming pool and to the north there are some specimen	

trees and a tennis court.
Contribution of Setting to the Significance of the Asset: The parkland and garden setting of the house enhances the appreciation for the significance of the asset by complimenting the aesthetics/architecture and historical importance of the building, which are the main conservation values, through the framing of views on the approach to the house, views from the house and gardens and by curating the character of the setting as that of a high-status country estate. The location of the house on the hill, is illustrative of the 'new' approach to 'English school' landscapes and perfecting and designing parkland, as pleasure grounds, the new site provided far loftier views of the river valley, with long countryside vistas. In this sense it is crucial to the significance of this as a 'new villa' for the prosperous upper middle classes, establishing themselves amongst the rural squirearchy.
Magnitude of Effect: *Direct Impact*: The drainage works will require the lifting of the stone paved and tiled floors in the south and north pavilions and central spine corridor in the basement, and the digging of trenches, through floor and construction deposits, as well as alterations/enlargement to existing openings through walls, foundations and the revetment walls of the basement courtyards. Existing brick lined Georgian culverts and 19th and 20th century drains and services occupy these spaces, so much alteration has already occurred this is far from a pristine 18th century system; wherever possible existing systems will merely be altered. The central spine corridor already has a long line of backfilled trenches repaired poorly in cement in the 1990s, associated with the water supply. Change to a high value Grade I listed building will always be considered inherently adverse, but the scale of change and therefore severity of impact is affected dependant on the phase of the project and location. The basement derives its significance from its ability to convey narrative and historic illustrative value, for example, the social history of service. The basement is however a space of less sensitivity to change, than some of the formal floors in the house, where delicate painting and decorations exist, the basement was constructed primarily to be a functional, practical working space. The basements of the north and south pavilions are however not modernised and are extraordinarily authentic, retaining their service character and many historic fixtures and fittings. There will be moderate change during constructional works to the basement floor of the building, but not affecting the integrity of the finishes, some expected associated damage to floors/floor surfaces. There will be major change to the archaeological deposits and culverts below the floors, which will be permanent and irreversible, although this will have no lasting visible effect on the wider building, as it will once again be buried. Negligible change over time during the operational phase; it is assumed that all floor surfaces will be put back and brickwork walls restored if/where required and the drainage itself is all below ground, apart from the pump house in the courtyard, it is expected sensible mitigation, such as screening/colour and design details could be introduced to reduce the visibility of the pump house over time. Its physical presence however must be acknowledged as a physical change to the immediate courtyard setting of the basement and north pavilion.
Significance of Effects: Direct Impact: High value asset + Minor change for constructional phase on the floors = Moderate/Slight adverse impact High value asset and Minor change for operational phase on the general basement and courtyards = Moderate/Slight adverse impact

Asset Name: **Trafalgar House, Park and Garden**	
Parish: Standlynch, Downton, Wiltshire	*Value*: Medium
Designation: GII	*Distance to Development*: within P&G
Description: Listing: Mid C19 formal garden designed by William Butterfield, set in an C18 park including early C18 works by Charles Bridgeman, surrounding a country house. HISTORIC DEVELOPMENT In 1726, Sir Peter Vandeput, a rich city merchant and member of a Flemish family which had settled in England in the C16, purchased the manor of Standlynch. In 1731-4, he built a new house on the site called Standlynch House (since the C19 known as Trafalgar House), to a design by the architect John James of Greenwich. During this period the park was replanned to a design by Charles Bridgeman (d 1738). Four years after Vandeput's death in 1748, Standlynch House was sold to William Young. In 1766 the House was sold on to Henry Dawkins, the grandson of a wealthy Jamaican landowner. Dawkins commissioned the architect John Wood the Younger (1728-81) from Bath to add two wings to the House. Shortly after, a new portico was added to a design by the architect Nicholas Revett. Dawkins also enlarged the estate by buying some adjoining land. By 1773 (Andrews and Drury), Standlynch House was approached from the south and was surrounded by a formal park. Following Dawkins' death in 1814, the estate was sold to the Crown. After the Battle of Trafalgar in 1805, Parliament rewarded Admiral Nelson's nearest surviving relative, his brother William, who duly became the first Earl Nelson, with Standlynch House (from then known as Trafalgar House as required by Act of Parliament). Under the Nelson family the estate grew steadily and by 1884 included 7196 acres (c 2900ha). In 1859, the third Earl commissioned the architect William Butterfield (1814-1900) to restore Standlynch church. During this period Butterfield also added a new balustrade to the east of the House and a formal terraced garden with central steps leading to two square pools to the west. Following a fire in 1866 the south wing of the House was rebuilt. During the late C19 and early C20 the estate fell into decline and by 1945 it had reduced in size by half. In 1948 the	

Duke of Leeds bought Trafalgar House, and repairs were carried out to the building. In 1953 the estate was sold to, and amalgamated with, the adjacent Longford Estate. Trafalgar House, together with part of the surrounding land, was sold off in 1961, changing hands several times over the following three decades. In 1995 Trafalgar House passed to a new owner and during a period of investment (when Trafalgar Park became the preferred name for the property), key land and woodland was re-acquired from the Longford Estate.

Trafalgar House remains (2003) in private ownership.

LOCATION, AREA, BOUNDARIES, LANDFORM, SETTING Trafalgar House, a site of c 65ha, is situated halfway between Alderbury and Downton. The River Avon runs along the western boundary of the site, and to the north, east, and south-east, the site is enclosed by farmland, with Standlynch Farm and Standlynch Dairy abutting the site's boundary in the north-east and north-west corners. To the south lies the neighboring estate of Barford Park.

ENTRANCES AND APPROACHES The main entrance lies to the north-east of the site, 580m east-north-east of the House, and is flanked to its south by Standlynch Lodge (c 1860, listed grade II). From here a drive runs westwards through a mature belt of trees before making a gentle curve in a south-westerly direction towards a rectangular forecourt on the east front of the House. The gravel forecourt is enclosed to the north, east, and south by brick balustrades (listed grade II), decorated with vases, introduced in 1859 to designs by William Butterfield.

The site can also be entered at Bundays Lodge, situated in the south-west corner of the park 360m south-west of the House. From here one of two drives leads in a north-easterly direction, the other in a north-westerly direction. The first turns north after c 350m and leads to the forecourt at the east front of the House. The other drive passes alongside the east wall of the kitchen gardens, with Standlynch church (listed grade II) and its surrounding graveyard to the east. North of the kitchen gardens the drive divides, one branch running eastwards to Home Farm, the other leading north and then east towards Standlynch Farm, c 500m north-east of the House (outside the area here registered). The medieval Standlynch church, founded in 1146 and rebuilt in 1677, has been redundant since the late C20. It was restored by William Butterfield in the mid C19 and in 1914 was rededicated as a private Roman Catholic chapel for the Nelson family. A new drive from the east was constructed after 1995.

PRINCIPAL BUILDING Trafalgar House (listed grade I), a country house of 1733, stands in the centre of the park. It comprises a central rectangular block with single-storey side wings linking two, two-storey pavilions added in 1766. The three-storey east front has seven bays with a central Doric portico, also added in 1766. The three-storey west front has seven windows in the central block, with a central door with steps giving access to formal gardens. The Venetian window in the south pavilion was altered in the mid C20 to provide a doorway and steps from the dining room into the garden.

Two late C18 stable blocks (converted into offices in the late C20, listed grade II) stand parallel to each other c 100m north-east of the House. They are enclosed by mature woodland planted along the eastern boundary of the site. Home Farm, which is screened to its west by mature woodland, stands c 250m to the south-west of the House. This includes a mid to late C19 farmhouse (listed grade II), with various outbuildings added to its west and south-east in the late C20.

GARDENS AND PLEASURE GROUNDS The gardens, covering an oval area of c 1ha, enclose the House to the north, west, and south and are separated from the park by a fenced ditch or ha-ha. South of the House the garden is laid out as a lawn enclosed by a hedge and specimen trees, with a central swimming pool (late C20). North of the House the garden is also laid to lawn and planted with specimen trees and a tennis court, while to the west lies a formal terraced garden. An upper grassed terrace runs north for c 120m along the west front of the House, from which two flights of balustraded steps (listed grade II) lead down, across a narrower grassed terrace, to a symmetrical scheme of gravel paths, lawns, and beds with a central fountain. The layout ends in a semicircular bastion to the west enclosed by clipped yew hedges, from which central steps lead down into the park. This central parterre is flanked to the north and south by matching square pools, again enclosed by yew hedges. From the formal gardens there are fine and extensive views over the parkland to the west. In the late C19, the central steps at the west end of the gardens gave access to a c 150m long formal avenue which led westwards to the woodland along the western boundary of the site (OS 1876). By 1901 (OS) this avenue had been replanted but in 1925 (OS) only a few trees remained. In 1733, before Bridgeman's alterations, garden compartments ran west and south of the new House, while to the north of the House, and separated from it by two lines of trees, was an extensive formal garden crisscrossed with diagonal paths (Willis 2002).

PARK The park east of the House is screened along its north side by a thick belt of mature woodland. In the park to the west, to the rear of the House, is an oval area of mature woodland. From the south-east corner of the House a mature woodland belt extends c 250m eastwards into the park, screening Home Farm situated at its far east end. The southern and eastern part of the park are laid to pasture with some areas now in agricultural use. The L-shaped park to the north of the tree belt north of the House (OS 1873) is linked to the west by a thick belt of trees and is currently in agricultural use.

The alterations proposed to the surroundings of the House in the mid-1730s by Charles Bridgeman were ambitious and the surviving traces indicate the scheme was largely, if not wholly, carried out. To the north of the House a wilderness with a central clearing was to be planted in part of the old formal garden. The main emphasis however was on the banks of the Avon to the west of the new house, which were to be thickly planted with trees. Through this a winding carriageway (which can still be traced, 2003) ran to four or five geometrically shaped glades or lookout points. At the park's northern limit, an amphitheatre with square viewing mound (extant, 2003) overlooked a point where the Avon turned briefly westwards (Mowl 2004).

KITCHEN GARDEN The kitchen gardens lie in the far south-west corner of the site, to the west of Standlynch church,

and cover an area of c 1ha. A walled garden in this area is shown on Andrews and Drury's map of 1773. By 1873 (OS), the kitchen garden consisted of two rectangular walled enclosures lined on the inside with glasshouses and various outbuildings.
Conservation Value: The garden has historical associative value with the various interesting owners of the house and the ancient former estate at Standlynch and several notable garden designers, Charles Bridgeman and William Butterfield. It has high historical illustrative value, with a 19th century formal garden created inside an earlier estate, with 1733 remains believed to survive to the west near the river, from an earlier, uncompleted design, meaning it also holds high evidential value. It largely however derives its significance from its aesthetics, as part of the early English school of landscape design.
Authenticity and Integrity: The Bridgeman designs appear to survive in part near the river with earlier gardens and features around the original manor house site and chapel. Much of the parkland was planted up later with significant swathes of trees covering the slopes between the house and river to the west and only one linear band of trees to the north appears to survive intact from the 1733 plans, much has been changed in later periods, including the current formal garden, which is attributed to William Butterfield, being executed in an older Georgian style. The gardens appear however to have been little altered, modernised in the 20th century, with the minor additions of a small swimming pool and tennis court.
Setting: Listing description: Trafalgar House, a site of c 65ha, is situated halfway between Alderbury and Downton. The River Avon runs along the western boundary of the site, and to the north, east, and south-east, the site is enclosed by farmland, with Standlynch Farm and Standlynch Dairy abutting the site's boundary in the north-east and north-west corners. To the south lies the neighboring estate of Barford Park.
Contribution of Setting to the Significance of the Asset: Incidental. The surrounding working agricultural countryside is irrelevant to the designed pleasure grounds within the boundary of the inner estate core, which is the registered park and garden, although some wider landscape features may be used as eye catchers. The river valley location/topography, however, is crucial to the designs in that much of the landscaping is intended to perfect the location and many features are positioned to interact with the river or valley, creating vistas.
Magnitude of Effect: *Direct Impact*: The drainage and soak away will be cut into the ground to the north and north-west of the house, both within the garden and in an adjacent field. This will have an obvious direct physical impact on the immediate area of the works, however, this will not affect the formal garden to the west and will not affect the acknowledged surviving remains near the river. The archaeological potential of the location of the immediate works cannot be fully assessed as there is a paucity of detailed parkland mapping, so this scheme may affect below ground evidence no longer visible from above. Major change on a limited area; permanent, and irreversible impact on any below ground archaeology in the immediate area of the groundworks.
Significance of Effects: Direct Impact: Medium value asset + Major change = Moderate/Large adverse impact.

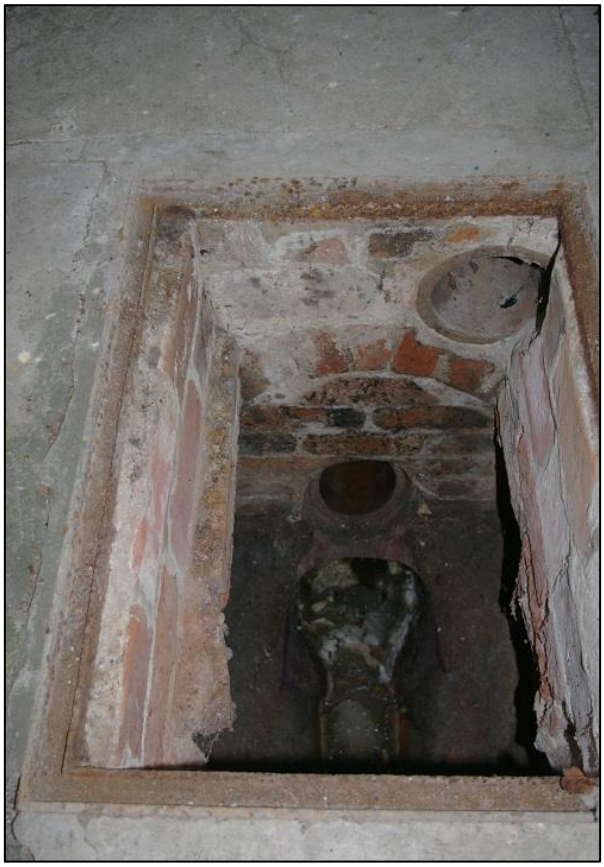

FIGURE 24: THE FINE FLAGSTONE FLOOR OF THE NORTH PAVILIONS, SHOWING 20TH CENTURY MANHOLE, FORCED INTO 18TH CENTURY BRICK CULVERT, AS WELL AS 19TH CENTURY BRICK INFILL AND PIPING; FROM THE SOUTH.



FIGURE 25: VIEW FROM THE NORTH PAVILION DOWN INTO THE NORTH-WEST COURTYARD, AGAIN SHOWING A FAR FROM PRISTINE SPACE, WITH ALTERED AND RESTORED WALLS, REPLACED BRICKWORK WHERE A BUILDING HAS CLEARLY BEEN REMOVED IN THE 20TH CENTURY AND EVEN REPLACED SECTIONS OF BALUSTRADE; FROM THE NORTH.

4.0 INDIRECT IMPACTS

4.1 STRUCTURE OF THE ASSESSMENT

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

The staged approach for the assessment of indirect impacts references the *Setting of Heritage Assets*[4]. The aim of this assessment is to identify the designated heritage assets outside the redline boundary that might be impacted upon by the proposed development, determine if an effect on their significance via setting is possible, and establish the level of impact. The staged approach advocated by GPA3 contains the following steps[5]:

1. Identify which heritage assets and their settings are affected.
2. Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.
3. Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it.
4. Explore ways to maximise enhancement and avoid or minimise harm.
5. Make and document the decision and monitor outcomes.

Step one is to identify the designated heritage assets that might be affected by the development. The first stage of that process is to determine an appropriate search radius, and this would vary according to the height, size and/or prominence of the proposed development. For instance, the search radius for a wind turbine, as determined by its height and dynamic character, would be much larger than for a single house plot or small agricultural building. For this assessment, the second part of the process is to examine the heritage assets within the search radius and assign them to one of three categories:

- Category #1 assets: Where proximity to the proposed development, the significance of the heritage asset concerned, or the likely magnitude of impact, demands detailed consideration.
- Category #2 assets: Assets where location and current setting would indicate that the impact of the proposed development is likely to be limited, but some uncertainty remains.
- Category #3 assets: Assets where location, current setting, significance would strongly indicate the impact would be no higher than negligible and detailed consideration both unnecessary and disproportionate. These assets are scoped out of the assessment but may still be listed in the impact summary table.

  Dependant on the nature of the development, this work may be informed, but not governed, by a generated ZTV (zone of theoretical visibility).

Pursuant to *Steps Two* and *Three*, a series of site visits are made to the designated heritage assets of Categories #1 and #2. Each asset is considered separately and appraised on its significance, condition, and setting/context by the assessor. The potential impacts the development are assessed for each location, taking into account site-specific factors and the limitations of that assessment (e.g. no access, viewed from the public road etc.). Photographic and written records are compiled during these visits. If a ZTV has been used in the assessment, the accuracy of the ZTV is corroborated with reference to field observations.

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

Step 4 is possible where the required information is available from the developer/client/agent, and where design is an iterative process rather than *fait accompli*. In many instances, adverse outcomes (and more rarely, beneficial outcomes) are unavoidable, as mitigation would have to take place at the heritage asset concerned or within an intervening space, and not the proposed site itself.

Assessment and documentation, *Step 5*, takes place within this document. The individual asset tables are completed for each assessed designated heritage asset, and, with an emphasis on practicality and proportionality,[6] assets are grouped by category (e.g., churches, historic settlements, funerary remains etc.) and provided with a generic preamble that avoids repetitious narrative. This initial preamble establishes the baseline sensitivity of a given category of monument or building to the potential effect; the individual entries that follow then elaborate on local circumstance and site-specific factors. The individual assessments are to be read in conjunction with the overall discussion, as the assessment of impact is reflection of both.

4.2 QUANTIFICATION

Due to nature of the site and the form of the proposals, a 750m radius has been considered suitable for the assessment of any likely impacts upon heritage assets as a result of the proposed development. There are 8 Listed Buildings (1 Grade I) within 750m of the site. The site itself is also within a Registered Park and Garden. There are no Conservation Areas or Scheduled Monuments within 1km of the site. Assets scoped out of the assessment following the fieldwork are only represented in the Table 6 (below).

The assets selected for assessment were Trafalgar House, Balustraded walls, steps and dwarf walls, Park and Garden; based on their perceived value and locations relative to the site, these have been treated as a both *Category #1* and *Category #2* assets. Other designated heritage assets within the wider vicinity of the site, such as Standlynch chapel were scoped out of the assessment following a site visit due to the lack of visibility of the site to and from their locations as a result of topography. With an emphasis on practicality and proportionality (see *Setting of Heritage Assets* p15 and p18), only those assets where there is the possibility for an effect greater than negligible (see Table 4 in Appendix 2) are considered here in detail and in summary Table 5.

- Category #1 assets: Trafalgar House (Grade I); Grade II listed park and garden
- Category #2 assets: the Grade II Listed balustraded walls; steps and dwarf walls

[6] Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraphs 2, 17, 19, 21, 23, 41.

4.3 IMPACT BY CLASS OF MONUMENT OR STRUCTURE

4.3.1 GRAND RESIDENCES

Large and/or surviving gentry houses, in public or private hands, often incorporating multi-period elements of landscape planning

The larger stately homes and lesser and surviving gentry seats were the homes of the manorial and lordly elite. Some may still be occupied by the descendants of medieval owners; others are in public ownership or held by the National Trust. Wealth derived from agriculture holdings, mineral exploitation and political office was invested on these structures as fashionable expressions of power and prestige. In addition, some homes will have been adapted in the post-Dissolution era from monastic centres (e.g. Buckland Abbey), and thus incorporate earlier buildings and hold further historical associations.

They are often Grade II* or Grade I Listed buildings on account of their condition and age, architecture features, internal fixtures and furniture, and historical and cultural associations. In addition, they are often associated with ancillary structures – chapels, stables, kitchen gardens etc. – that may be included within the curtilage of the House or be Listed in their own right. In addition, there is often a high degree of public amenity.

As such, these dwellings and associated structures were visual expressions of the wealth and aspirations of the owners and were designed to be impressive. They were frequently located within a landscape manipulated to display them to best effect, and views to and from the structures were very important. In earlier periods this might be restricted to the immediate vicinity of the House – i.e., geometric formal gardens – but even these would have incorporated long prospects and might be associated with deer parks. From the 18th century, designed landscapes associated with the House laid out in a naturalistic style and incorporating multiple geographically disparate associated secondary structures became fashionable. The surviving examples usually contain many mature trees and thus local blocking is common. However, such is the sensitivity of these Houses, and in particular their associated designed landscapes, that the visual impact of a wind turbine is likely to be severe.

What is important and why

The great houses are examples of regional if not national architectural value and may be located on sites with a long history of high-status occupation (evidential), such as with the medieval settlement of Standlynch. They may conform to a particular style (e.g. Palladian, Greek Revival) and some were highly influential locally or nationally; surviving examples are often well-maintained and preserved (historical/illustrative). They were typically built by gentry or noble families, could stage historically important events or host, be associated with influential people (i.e, the Nelson family) and were often depicted in art and painting; they are typically associated with a range of other ancillary structures and gardens/parks (historical/associational). The epitome of design, they have clear aesthetic/design value, arising from their intrinsic architectural style, but also the extensive grounds they were usually associated with, and within which they were designed to be seen and appreciated. The aesthetic/design value can improve with time (the 'patina of age'), but it can also be degraded through unsympathetic development. As large structures built for the use of a single family, communal value is typically low, although an argument can be made the 19th and early 20th century great house was a community in its own right, with its family, servants and extended base of suppliers.

Asset Name: **Trafalgar House**	
Parish: Standlynch, Downton, Wiltshire	*Value*: High
Designation: GI	*Distance to Development*: c.75m
Description: Listing: (List entry no. 1183796) Country house. 1733 by John James for Peter Vandeput, wings and pavilions of 1766 by John Wood the Younger for Henry Dawkins, second floor added shortly before portico of 1766 by Nicholas Revett. Flemish bond brick with chamfered limestone quoins, wings are English bond, Welsh slate hipped roofs, brick stacks with stone cappings. Central rectangular block with side wings linking two pavilions. 3-storey, 7-bay symmetrical front. Central Doric portico by Revett has pairs of columns of Order of The Temple of Apollo at Delos, projecting pediment and balustraded parapet, double half-glazed doors in Gibbs surround, three 12-pane sashes either side. First floor has seven sashes; all windows with Gibbs surrounds. Modillioned cornice to second floor; seven 6-pane sashes in moulded architraves. Moulded cornice to blocking course. Returns have rainwater heads with date 1733. 5-bay right return has blind windows to left and right, sashes to centre bays same as front. Left return has 3 bays with Sashes same as front and fine Venetian window lighting stairs to centre bay of first floor. Rear of main block has 3 storeys and basement, 7 windows same as front, centre 3 bays break forward with modillioned pediment and central glazed doors with segmental pediment on Tuscan columns, basement has 2-light casements. Linking wings are single-storey with basement and 5 windows; 12-pane sashes. Pavilions have 2 storeys and basements, 3:3:3 bays to fronts at right angles to main block. Centre bays break forward with hipped roof, 12-pane sashes with flat-arched heads, French windows to 3-bay returns and Venetian windows with grooved surrounds and paterae to centre bays of outward-facing fronts, 2-light leaded casements to basements. Hipped roofs with moulded cornices and blocking courses. Interior: Fittings of main block mostly of 1733; open well stairs on south side with 3 turned balusters to a tread and carved spandrels, very fine entrance hall with coved plaster ceiling with rococo decoration, walls with Corinthian pilasters, floral swags and chinoiserie panels, open pedimented doors and fireplace, modillioned ceiling cornice. Saloon in similar style. Room to left of hall has fine painted decoration of c1766 by J. B. Cipriani, depicting allegorical scenes. Other internal decor by Revett, including fine ceiling, in north pavilion. Rococo and classical fireplaces, double doors and doors with fielded panels and central beading. North pavilion refitted early C19, south pavilion entirely refitted following fire of 1866. Estate bought by Treasury after death of Dawkins in 1814 and given to heirs of Admiral Viscount Nelson, in gratitude for his services. The house was then occupied by his brother, 1st Earl Nelson and the name of the house changed from Standlynch House to Trafalgar House. House of 1733 built to replace an earlier house by the river, demolished by Vandeput.	
Conservation Value: The building derives national significance from its historical-associative value with the Nelson family; the estate being gifted to the Admiral's heirs, in 1814, in gratitude for his sacrifice at Trafalgar and renamed Trafalgar House, by his brother. Lesser associational value with banker and merchant Sir Peter Vandeput, who built the 'new house' in 1733 and Jamaican plantation owner Henry Dawkins, who was also MP for Southampton and Chippenham; who enlarged the house, building the wings in 1766 and paying for aggrandisements like the balustrades and portico. The house is architecturally important, associated with architects John James, James Wood, as well as Nicholas Revett, famed traveller, and Greek Revival proponent. Aesthetically pleasing, the house also successfully conveys narrative value with clear structural phasing, illustrative of social change, technological advancement and fluctuation in taste/fashions, also making it high in evidential value. Archaeologically the building will seal beneath, and contain within its structure, evidence of its own construction, but the historic mapping indicates the 1733 house's plot was wholly separate from the earlier site of the manor house, down near the river. There is no communal value, the building is defined by its exclusivity and high status. The building certainly holds some level of symbolic, local landmark status in the surrounding landscape and river valley.	
Authenticity and Integrity: The house is extraordinarily authentic having been retained as a private home since the 18th century, whilst it has the inevitable changes and alterations, such as the addition of lighting, a luggage lift, mains water etc, it retains overwhelmingly uniform Georgian character and its historic phases are easily discernible, even in the basement, a space most vulnerable to change.	
Setting: The house sits within gardens and pleasure grounds of approximately 1ha, with wooded and grass parkland beyond, much now used agriculturally, collectively approximately 65ha. The house is flanked to the east by a rectangular courtyard, enclosed by brick balustrades, with gravelled parking areas, to the west a stepped grass parterre leads down to a formal garden, with rectangular pools to north and south, framed by yew hedges. To the south a formal lawn now has the addition of a 20th century swimming pool and to the north	

there are some specimen trees and a tennis court.
Contribution of Setting to the Significance of the Asset: The parkland and garden setting of the house enhances the appreciation for the significance of the asset by complimenting the aesthetics/architecture and historical importance of the building, which are the main conservation values, through the framing of views on the approach to the house, views from the house and gardens and by curating the character of the setting as that of a high-status country estate. The location of the house on the hill, is illustrative of the 'new' approach to 'English school' landscapes and perfecting and designing parkland, as pleasure grounds, the new site provided far loftier views of the river valley, with long countryside vistas. In this sense it is crucial to the significance of this as a 'new villa' for the prosperous upper middle classes, establishing themselves amongst the rural squirearchy.
Magnitude of Effect*: Indirect Impact*: During the constructional phase the works will have an impact on the experience of the asset, from both light and aural intrusion, but this is for a limited timescale, and the building is also not accessible to the public, so this effect is limited. Minor effect. The pump house proposed for location in the north-west sunken courtyard may have a slight operational phase indirect visual impact on the ground floor rooms on the west side of the north pavilion and west side of the main block, in glancing views out across the balustrades to the gardens beyond. These views will change but careful screening design could minimise the pump house within them, so reduce the potential for distraction and drawing the eye downwards. Outward views from formal rooms are crucial to the understanding of the relationship of the house and its setting and the experience of these formal spaces defines the significance of the asset. The pump house would not be in any direct views out and won't be visible in views between blocks or in, inward views. Minor effect.
Significance of Effects: Indirect Impact: High value asset and Moderate change for constructional phase = Moderate/Large Adverse Impact High value asset and Negligible change for operational phase = Slight/Adverse Impact



FIGURE 26: TRAFALGAR HOUSE, GRADE I LISTED BUILDING; FROM THE NORTH-WEST.

4.3.1 REGISTERED PARKS AND GARDENS

In/formal planning tends to be a pre-requisite for registered landscapes but varies according to individual design. Such landscapes can be associated with larger stately homes (see above) but can be more modern creations. Landscape parks are particularly sensitive to intrusive visual elements (see above), but many gardens are usually focused inward, and usually incorporate

stands of mature trees that provide (seasonal) local blocking. Unless the proposed wind turbine is to be located close to the garden, its impact would be minimal.

What is important and why

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

Asset Name: **Trafalgar House, Park and Garden**	
Parish: Standlynch, Downton, Wiltshire	*Value*: Medium
Designation: GII	*Distance to Development*: inside P&G
Description: Listing: Mid C19 formal garden designed by William Butterfield, set in an C18 park including early C18 works by Charles Bridgeman, surrounding a country house. HISTORIC DEVELOPMENT In 1726, Sir Peter Vandeput, a rich city merchant and member of a Flemish family which had settled in England in the C16, purchased the manor of Standlynch. In 1731-4, he built a new house on the site called Standlynch House (since the C19 known as Trafalgar House), to a design by the architect John James of Greenwich. During this period the park was replanned to a design by Charles Bridgeman (d 1738). Four years after Vandeput's death in 1748, Standlynch House was sold to William Young. In 1766 the House was sold on to Henry Dawkins, the grandson of a wealthy Jamaican landowner. Dawkins commissioned the architect John Wood the Younger (1728-81) from Bath to add two wings to the House. Shortly after, a new portico was added to a design by the architect Nicholas Revett. Dawkins also enlarged the estate by buying some adjoining land. By 1773 (Andrews and Drury), Standlynch House was approached from the south and was surrounded by a formal park. Following Dawkins' death in 1814, the estate was sold to the Crown. After the Battle of Trafalgar in 1805, Parliament rewarded Admiral Nelson's nearest surviving relative, his brother William, who duly became the first Earl Nelson, with Standlynch House (from then known as Trafalgar House as required by Act of Parliament). Under the Nelson family the estate grew steadily and by 1884 included 7196 acres (c 2900ha). In 1859, the third Earl commissioned the architect William Butterfield (1814-1900) to restore Standlynch church. During this period Butterfield also added a new balustrade to the east of the House and a formal terraced garden with central steps leading to two square pools to the west. Following a fire in 1866 the south wing of the House was rebuilt. During the late C19 and early C20 the estate fell into decline and by 1945 it had reduced in size by half. In 1948 the Duke of Leeds bought Trafalgar House, and repairs were carried out to the building. In 1953 the estate was sold to, and amalgamated with, the adjacent Longford Estate. Trafalgar House, together with part of the surrounding land, was sold off in 1961, changing hands several times over the following three decades. In 1995 Trafalgar House passed to a new owner and during a period of investment (when Trafalgar Park became the preferred name for the property), key land and woodland was re-acquired from the Longford Estate. Trafalgar House remains (2003) in private ownership. LOCATION, AREA, BOUNDARIES, LANDFORM, SETTING Trafalgar House, a site of c 65ha, is situated halfway between Alderbury and Downton. The River Avon runs along the western boundary of the site, and to the north, east, and south-east, the site is enclosed by farmland, with Standlynch Farm and Standlynch Dairy abutting the site's boundary in the north-east and north-west corners. To the south lies the neighboring estate of Barford Park. ENTRANCES AND APPROACHES The main entrance lies to the north-east of the site, 580m east-north-east of the House, and is flanked to its south by Standlynch Lodge (c 1860, listed grade II). From here a drive runs westwards	

through a mature belt of trees before making a gentle curve in a south-westerly direction towards a rectangular forecourt on the east front of the House. The gravel forecourt is enclosed to the north, east, and south by brick balustrades (listed grade II), decorated with vases, introduced in 1859 to designs by William Butterfield.

The site can also be entered at Bundays Lodge, situated in the south-west corner of the park 360m south-west of the House. From here one of two drives leads in a north-easterly direction, the other in a north-westerly direction. The first turns north after c 350m and leads to the forecourt at the east front of the House. The other drive passes alongside the east wall of the kitchen gardens, with Standlynch church (listed grade II) and its surrounding graveyard to the east. North of the kitchen gardens the drive divides, one branch running eastwards to Home Farm, the other leading north and then east towards Standlynch Farm, c 500m north-east of the House (outside the area here registered). The medieval Standlynch church, founded in 1146 and rebuilt in 1677, has been redundant since the late C20. It was restored by William Butterfield in the mid C19 and in 1914 was rededicated as a private Roman Catholic chapel for the Nelson family. A new drive from the east was constructed after 1995.

PRINCIPAL BUILDING Trafalgar House (listed grade I), a country house of 1733, stands in the centre of the park. It comprises a central rectangular block with single-storey side wings linking two, two-storey pavilions added in 1766. The three-storey east front has seven bays with a central Doric portico, also added in 1766. The three-storey west front has seven windows in the central block, with a central door with steps giving access to formal gardens. The Venetian window in the south pavilion was altered in the mid C20 to provide a doorway and steps from the dining room into the garden.

Two late C18 stable blocks (converted into offices in the late C20, listed grade II) stand parallel to each other c 100m north-east of the House. They are enclosed by mature woodland planted along the eastern boundary of the site. Home Farm, which is screened to its west by mature woodland, stands c 250m to the south-west of the House. This includes a mid to late C19 farmhouse (listed grade II), with various outbuildings added to its west and south-east in the late C20.

GARDENS AND PLEASURE GROUNDS The gardens, covering an oval area of c 1ha, enclose the House to the north, west, and south and are separated from the park by a fenced ditch or ha-ha. South of the House the garden is laid out as a lawn enclosed by a hedge and specimen trees, with a central swimming pool (late C20). North of the House the garden is also laid to lawn and planted with specimen trees and a tennis court, while to the west lies a formal terraced garden. An upper grassed terrace runs north for c 120m along the west front of the House, from which two flights of balustraded steps (listed grade II) lead down, across a narrower grassed terrace, to a symmetrical scheme of gravel paths, lawns, and beds with a central fountain. The layout ends in a semicircular bastion to the west enclosed by clipped yew hedges, from which central steps lead down into the park. This central parterre is flanked to the north and south by matching square pools, again enclosed by yew hedges. From the formal gardens there are fine and extensive views over the parkland to the west. In the late C19, the central steps at the west end of the gardens gave access to a c 150m long formal avenue which led westwards to the woodland along the western boundary of the site (OS 1876). By 1901 (OS) this avenue had been replanted but in 1925 (OS) only a few trees remained.

In 1733, before Bridgeman's alterations, garden compartments ran west and south of the new House, while to the north of the House, and separated from it by two lines of trees, was an extensive formal garden criss-crossed with diagonal paths (Willis 2002).

PARK The park east of the House is screened along its north side by a thick belt of mature woodland. In the park to the west, to the rear of the House, is an oval area of mature woodland. From the south-east corner of the House a mature woodland belt extends c 250m eastwards into the park, screening Home Farm situated at its far east end. The southern and eastern part of the park are laid to pasture with some areas now in agricultural use. The L-shaped park to the north of the tree belt north of the House (OS 1873) is lined to the west by a thick belt of trees and is currently in agricultural use.

The alterations proposed to the surroundings of the House in the mid-1730s by Charles Bridgeman were ambitious and the surviving traces indicate the scheme was largely, if not wholly, carried out. To the north of the House a wilderness with a central clearing was to be planted in part of the old formal garden. The main emphasis however was on the banks of the Avon to the west of the new house, which were to be thickly planted with trees. Through this a winding carriageway (which can still be traced, 2003) ran to four or five geometrically shaped glades or lookout points. At the park's northern limit, an amphitheatre with square viewing mound (extant, 2003) overlooked a point where the Avon turned briefly westwards (Mowl 2004).

KITCHEN GARDEN The kitchen gardens lie in the far south-west corner of the site, to the west of Standlynch church, and cover an area of c 1ha. A walled garden in this area is shown on Andrews and Drury's map of 1773. By 1873 (OS), the kitchen garden consisted of two rectangular walled enclosures lined on the inside with glasshouses and various outbuildings.

Conservation Value: The garden has historical associative value with the various interesting owners of the house and the ancient former estate at Standlynch and several notable garden designers, Charles Bridgeman and William Butterfield. It has high historical illustrative value, with a 19th century formal garden created inside an earlier estate, with 1733 remains believed to survive to the west near the river, from an earlier, uncompleted design, meaning it also holds high evidential value. It largely however derives its significance from its aesthetics, as part of the early English school of landscape design.

Authenticity and Integrity: The Bridgeman designs appear to survive in part near the river with earlier gardens and features around the original manor house site and chapel. Much of the parkland was planted up later with significant

swathes of trees covering the slopes between the house and river to the west and only one linear band of trees to the north appears to survive intact from the 1733 plans, much has been changed in later periods, including the current formal garden, which is attributed to William Butterfield, being executed in an older Georgian style. The gardens appear however to have been little altered, modernised in the 20th century, with the minor additions of a small swimming pool and tennis court.
Setting: Listing description: Trafalgar House, a site of c 65ha, is situated halfway between Alderbury and Downton. The River Avon runs along the western boundary of the site, and to the north, east, and south-east, the site is enclosed by farmland, with Standlynch Farm and Standlynch Dairy abutting the site's boundary in the north-east and north-west corners. To the south lies the neighboring estate of Barford Park.
Contribution of Setting to the Significance of the Asset: Incidental. The surrounding countryside is irrelevant to the designed pleasure grounds within the boundary of the inner estate core, which is the registered park and garden. The river valley location is crucial to the designs in that much of the landscaping and many features ae positioned to interact with the river or valley
Magnitude of Effect*: Indirect Impact*: There would be in an increase in light and aural intrusion on the setting from the constructional phase, potentially affecting the appreciation of the formal gardens but this is temporary, and these gardens are not open to visitors, being privately owned. Negligible overall. There would be a minor impact, decreasing over time from the operational phase as the scarred ground from the works re-establishes itself and blends back into the setting. This may also affect the Listed house and create a temporary cumulative impact. Negligible overall.
Significance of Effects: Indirect Impact: Medium value asset + Negligible change = Neutral/Slight adverse impact.

Asset Name: **Balustraded Walling to Front of Trafalgar House**	
Parish: Standlynch, Downton, Wiltshire	*Value*: Medium
Designation: GII	*Distance to Development*:
Description: Listing: (List entry no. 1355697) Low walls with balustraded panels 1859 by William Butterfield. Brick with bond of two courses of headers to one of alternate stretchers and headers, vitrified headers, vase balusters. Moulded limestone coping with urn finials. Very similar in style to balustraded parapet on Revett porch. (P. Thompson, William Butterfield, 1971 page 413)	
Conservation Value: The balustrades derive their significance from their aesthetic and architectural value and their historic associational value with the house and its notable former owners, as well as the notable garden designer William Butterfield, who designed them as an addition, complimenting the earlier Nicholas Revett portico/porch.	
Authenticity and Integrity: The balustrades appear in several historic photographs from the 19th and 20th century and can be seen to be little altered.	
Setting: The balustrades frame the east front of the house, accessed from the north-east by a new driveway and can be seen to be of similar style and complimentary to the Revett porch, enclosing a gravelled courtyard. To the north-east the balustrade is approached via a grand sweep of driveway, passing through grass parkland, mature trees are planted in small coppices to the east, north-east and south-east, placing focus on the main façade of the house.	
Contribution of Setting to the Significance of the Asset: Whilst these assets have some defined architectural value, they are primarily included due to their importance in framing and curating the experience of the eastern approach to the Grade I listed house, being part of a group of built form with the house, which helps to further reveal the significance of that asset.	
Magnitude of Effect*: Indirect Impact*: There may be an increase in light and aural intrusion on the park and garden and all assets within it, as a group, experiencing cumulative indirect impact from the constructional phase, potentially affecting the appreciation of the formal gardens and approaches to the house. Firstly, this is temporary, and these gardens are not open to visitors, being privately owned, also the effect will be magnified to the west but since the main drive approaches from the north-east there may be wider impact from plant machinery. Minor to Negligible overall.	
Significance of Effects: Indirect Impact: Medium value asset + Negligible change over time for operational phase = Neutral/Slight adverse impact Medium value asset + Minor change during constructional phase = Slight adverse impact	

Asset Name: **Steps and Dwarf walls to the rear of Trafalgar House**	
Parish: Standlynch, Downton, Wiltshire	*Value*: Medium

Designation: GII	*Distance to Development*:
Description: Listing: (List entry no.1183844) Two flights of 6 stone steps up to garden entrance of house, with Flemish bond brick dwarf walls with moulded stone coping and urn finials on piers.	
Conservation Value: The balustrades derive their significance from their aesthetic and architectural value and their historic associational value with the house and its notable former owners, as well as the notable garden designer William Butterfield, who designed them and the formal garden, in an intentional 18th century style to compliment the house.	
Authenticity and Integrity: The steps and garden seem complete and little altered.	
Setting: Listing description: An upper grassed terrace runs north for c 120m along the west front of the House, from which two flights of balustraded steps (listed grade II) lead down, across a narrower grassed terrace, to a symmetrical scheme of gravel paths, lawns, and beds with a central fountain. The layout ends in a semi-circular bastion to the west enclosed by clipped yew hedges, from which central steps lead down into the park. This central parterre is flanked to the north and south by matching square pools, again enclosed by yew hedges. From the formal gardens there are fine and extensive views over the parkland to the west. In the late C19, the central steps at the west end of the gardens gave access to a c 150m long formal avenue which led westwards to the woodland along the western boundary of the site (OS 1876). By 1901 (OS) this avenue had been replanted but in 1925 (OS) only a few trees remained.	
Contribution of Setting to the Significance of the Asset: The steps derive their significance from being part of the Butterfield designed scheme for the formal gardens and their setting/function is therefore crucial to their significance.	
Magnitude of Effect*: Indirect Impact*: There may be an increase in light and aural intrusion on the park and garden and all assets within it, from the constructional phase, potentially affecting the appreciation of the formal gardens and approaches to the house. Firstly, this is temporary, and these gardens are not open to visitors, being privately owned, also the effect will be magnified to the west, where the formal gardens, of the highest value are located and provide direct views out over the location of the proposed site works. During this phase the ability to experience these gardens as intended will be disrupted. There would be a minor impact, decreasing over time from the operational phase as the scarred ground from the works re-establishes itself and blends back into the setting. This may also affect the Listed house and create a temporary cumulative impact. Negligible overall.	
Significance of Effects: Indirect Value: Medium value asset + Minor change during construction = Slight adverse impact. Medium value asset + Negligible change over time from operational phase = Neutral/Slight adverse impact	



FIGURE 27: THE WESTERN STEPS BETWEEN THE GARDEN AND PARKLAND AT TRAFALGAR HOUSE; FROM THE WEST-NORTH-WEST.



FIGURE 28: THE UPPER SET OF STEPS AND DWARF WALLS, WITHIN THE STEPPED PARTERRE AT TRAFALGAR HOUSE; FROM THE SOUTH.

4.3.2 AGGREGATE IMPACT

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

Based on the restricted number of assets where any appreciable effect is likely, the aggregate impact of this development is **minor,** to **negligible**. There is the potential for some constructional phase impacts on the heritage assets in closest proximity to the proposed development, predominately in the increased aural and light intrusion, which will affect the experience of the house and grounds for a temporary period of time.

4.3.3 CUMULATIVE IMPACT

Cumulative impacts affecting the setting of a heritage asset can derive from the combination of different environmental impacts (such as visual intrusion, noise, dust and vibration) arising from a single development or from the overall effect of a series of discrete developments

The Setting of Heritage Assets 2011a, 25
*The key for all cumulative impact assessments is to focus on the **likely significant** effects and in particular those likely to influence decision-making.*
GLVIA 2013, 123

An assessment of cumulative impact is, however, very difficult to gauge at this early stage and is more appropriately to be considered as part of the holistic Heritage Management Plan; as it must take into account existing, consented and proposed developments, as well as the High value of

the main asset, being Grade I and the increased group value of the house, park & garden and garden features, which is probably of Very High value, for which the threshold of acceptability is going to be much lower than for each individual asset. This must be weighed against the considerable public benefit in ensuring the survival and sustainable restoration of a heritage asset group of national significance.

5.0 CONCLUSIONS

The site lies in the parish of Downton, although for some of its history comprised a parish in its own right. It was documented as a settlement at Domesday. By the mid-15th century, it appears all three portions of the manor were united under the ownership of Henry Hugyn. It was purchased by William Green in 1551 and was in the possession of Walter Buckland by 1587. Standlynch was purchased by Sir Peter Vandeput Bt in 1726. He was responsible for the construction of the present house in 1733 and commissioned garden designs by Charles Bridgeman. It was then sold by his son in 1752 to William Young who sold it in 1766 to Henry Dawkins. Dawkins enlarged the house to its present form. Standlynch House was purchased in 1815 by the Crown for the heirs of Vice-Admiral Horatio Nelson, Viscount Nelson and renamed the Trafalgar Estate. William Butterfield was commissioned in 1859 to remodel the formal gardens to their present form, possibly reusing elements of the earlier garden designs. Trafalgar House remained in the Nelson family until its sale was permitted by the Trafalgar Estates Act 1947. It was sold in 1948, 1953, 1958, 1961, 1971, 1992 and 1995. The estate has recently changed ownership again. Trafalgar House is Grade I Listed, and a number of Grade II Listed heritage assets are located around the property. It also lies within the Grade II Listed Trafalgar House Registered Park and Garden. There are no Scheduled Monuments within 1km of the site.

A walkover survey of the site confirmed the presence of some earthworks north of the north pavilion, likely associated with the well-researched mid-19th century garden and documented on early-mid 20th century aerial photographs. Historic photographs and mapping may suggest that the Ha-ha continued further around to the north side of the house, but this was not observed during the walkover. The field has no earthworks or evidence for below ground deposits, the trench line of the soakaway will breach the Ha-ha where it survives to the west, as an overgrown shallow earth bank. There is no evidence of any earlier formal gardens relating to the 1730s house, or other features of interest. Any development on the site has the potential to encounter and destroy the buried archaeological resource, connected to the mid-19th century gardens and any other unidentified remains. Archaeological mitigation in the form of a limited and proportionate, commencement programme of monitoring (watching brief) during the site strip would provide a clearer indication of the presence of buried archaeological remains and allow for either the recording and removal of features or the swift clearance of any associated planning conditions. In terms of indirect impacts, most of the designated heritage assets in the vicinity of the site do have direct intervisibility and there may also be the potential for cumulative impact during the construction phase, but all of these are time-sensitive to the limited period of the groundworks, and will reduce over time, as the trenches weather in and the grass re-establishes, as all infrastructure will be below ground, so there is no long-term visual change.

With this in mind, the overall impact of the proposed development, over time can be assessed as **negligible**. The impact of the development on any buried archaeological resource may be **permanent** and **irreversible** but can be mitigated through an appropriate programme of archaeological investigation and recording.

TABLE 3: OVERALL IMPACT SUMMARY

Asset:	Designation:	Impact from Constructional Phase	Impact from Operational Phase
Archaeological Deposits	None	Moderate/Large	N/A
Trafalgar House	Grade I	Moderate/Large	Slight
Park and Garden	Grade II	Moderate/Large	Neutral/Slight
Balustraded walls	Grade II	Neutral/Slight	N/A
Steps and Dwarf walls	Grade II	Neutral/Slight	Neutral/Slight

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APPENDIX 1: SUPPORTING PHOTOGRAPHS - WALKOVER SURVEY



1. VIEW ACROSS THE NORTHERN GRASSED GARDEN, SHOWING THE POSITION OF THE PROPOSED DRAINAGE; FROM THE SOUTH.



2. VIEW ACROSS THE SUB-SQUARE SUNKEN FEATURE WHICH COULD BE A FORMER 'BORDER' FROM THE 19TH CENTURY GARDEN FROM THE WEST.



3. VIEW NORTHWEST FROM THE NORTH PAVILION, LOOKING DOWN TO THE GATE INTO THE FIELD, ALSO SHOWING SOME SMALL UNDULATIONS, WITH TREE BOLES FROM THINNED PARKLAND TREES; FROM THE SOUTH-EAST.



4. VIEW OF THE GARDEN WHICH WILL BE TRUNCATED BY THE TRENCHES FOR THE SOAKAWAY LEADING NORTH-WEST AWAY FROM THE NORTHERN PAVILION; FROM THE NORTH-WEST.



5. DETAILED VIEW OF THE SECTION OF PARTERRE TO BE TRUNCATED AND BALUSTRADED WALLS, ENCLOSING THE NORTH-WESTERN SUNKEN BASEMENT; FROM THE NORTH-WEST.



6. VIEW DOWN THE LINE OF THE PROPOSED SOAKAWAY, SHOWING THE RECENT REMOVAL OF A HEDGE AND SWEEPING GRASS LAWNS; FROM THE SOUTH-EAST.



7. VIEW ALONG THE PROPOSED LINE OF THE NEW DRAINAGE, NORTH OF THE NORTH PAVILION; FROM THE SOUTH.



8. VIEW ACROSS THE LINE OF THE PROPOSED SOAKAWAY ROUTE, FORM THE WEST PARTERRE; FROM THE EAST, SOUTH-EAST.



9. VIEW OF THE HA-HA, AT THE POINT IT WILL BE TRUNCATED, FROM ABOVE; FROM THE SOUTH.



10. VIEW ALONG THE FENCE BOUNDARY WHERE THE HA-HA HAS BEEN TRUNCATED AND IS NO LONGER VISIBLE ABOVE GROUND; FROM THE SOUTH.



11. VIEW ALONG THE HA-HA; FROM THE NORTH.



12. GEOTECHNICAL PIT NEXT TO THE POSITION OF THE SOAKAWAY; FROM THE NORTH.



13. VIEW ACROSS THE PROPOSED LOCATION OF THE SOAKAWAY IN THE FIELD/PARKLAND; FROM THE SOUTH-EAST.



14. THE WATER TROUGH JUST BELOW THE POSITION OF THE SOAKAWAY; FROM THE NORTH.



15. DETAILED VIEW ACROSS THE SLOPE, WHERE THE SOAKAWAY IS PROPOSED, SHOWING NO OBVIOUS EARTHWORKS OR PARCH MARKS; FROM THE NORTH-NORTH-WEST.

APPENDIX 2: IMPACT ASSESSMENT METHODOLOGY

Heritage Impact Assessment - Overview

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

National Policy

General policy and guidance for the conservation of the historic environment are now contained within the *National Planning Policy Framework* (Department for Communities and Local Government 2012 revised 2021)[7]. The relevant guidance is reproduced below:

Paragraph 194

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

Paragraph 195

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

A further key document is the Planning (Listed Buildings and Conservation Areas) Act 1990[8], in particular section 66(1), which provides *statutory protection* to the setting of Listed buildings:

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

In addition, the Ancient Monuments and Archaeological Areas Act 1979[9], the Protection of Wrecks Act 1973[10], and the Historic Buildings and Ancient Monuments Act 1953[11] also contain relevant statutory provisions.

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

Development within a Historic Environment

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

[7] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf.
[8] https://www.legislation.gov.uk/ukpga/1990/9/contents.
[9] https://www.legislation.gov.uk/ukpga/1979/46/contents.
[10] https://www.legislation.gov.uk/ukpga/1973/33/contents.
[11] https://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents.

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

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

In contrast, unknown archaeological assets are, by definition, unidentified, unquantified and their significance is not understood. Clear understanding of the value and significance of the archaeology must therefore be achieved via a staged process of documentary and archaeological investigation in line with the relevant guidance.

Significance in Decision-Making

It is the determination of *significance* that is critical to assessing level of impact, whether the effect is determined to be beneficial or adverse. The PPG states: *Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent, and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals*[12].

The relevant Historic England guidance is *Managing Significance in Decision-Taking in the Historic Environment*[13]. The following is a staged process for decision-taking, largely based on that document.

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

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

For designated heritage assets, which have been designated *because* they are deemed significant, Step 1 is relatively straightforward, and Step 2 is also, to a degree quantified, as the determination of significance, to a greater or lesser extent, took place then the heritage asset was designated[14]. For undesignated heritage of assets comparable value, or for archaeological sites that may have not been investigated (or were unknown or poorly understood prior to identification), a staged process of assessment is required (below).

Once an assessment of value and significance has been made, either by reference to designation or comparable importance if undesignated, the significance of the effect (TABLE 6) and magnitude of the impact (TABLE 7) can be determined. The former is logical and objective, the latter is a more nuanced but subjective, and the accompanying discussion provides the more narrative but subjective approach advocated by Historic England. This is a useful balance between rigid logic and nebulous subjectivity (e.g. the significance of effect on a Grade II Listed building can never be greater than moderate/large; an impact of substantial adverse is almost never achieved). This is in adherence with GPA3[15].

[12] https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment. Paragraph 007.
[13] Historic England 2015: *Managing Significance in Decision-Taking in the Historic Environment Good Practice Advice in Planning Note 2*. Paragraph 6.
[14] With the caveat that Listed building descriptions vary in quality between authorities, and interiors may not have been inspected.
[15] Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 19.

In the NPPF, adverse impact is divided into the categories: *total loss*, *substantial harm*, and *less than substantial harm*. The bar for substantial harm was set at a very high level in 2013 by the case Bedford BC v SSCLG38. However, following a recent High Court action[16] it is possible a *major adverse impact* may now qualify as a *substantial harm*. Any lesser adverse impact will constitute a *less than substantial harm*. TABLE 8 shows how this report correlates the two systems.

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

In this context it is useful to remember that *setting is not itself a heritage asset, nor a heritage designation… its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance*[17]. Thus it is not simply the contribution to significance that is important, but also how a setting facilitates or hinders an appreciation of the significance of a heritage asset. *The contribution of setting to the significance of a heritage asset is often expressed by reference to views*[18], but *…setting is different to general amenity. Views out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting*[19]. Thus it is possible for views between and across heritage assets and a development to exist without there necessarily being an effect.

In addition, and as PPG states[20]: *The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each*.

The concept of setting is explored in more detail below (see *Definitions*).

Value and Importance

While every heritage asset, designated or otherwise, has some intrinsic merit, the act of designation creates a hierarchy of importance that is reflected by the weight afforded to their preservation and enhancement within the planning system. The system is far from perfect, impaired by an imperfect understanding of individual heritage assets, but the value system that has evolved does provide a useful guide to the *relative* importance of heritage assets. Provision is also made for heritage assets where value is not recognised through designation (e.g. undesignated 'monuments of Schedulable quality and importance' should be regarded as being of *high* value); equally, there are designated monuments and structures of *low* relative merit. TABLE 4: THE HIERARCHY OF VALUE/IMPORTANCE (BASED ON THE DMRB LA104 2020 TABLE 3.2N).TABLE 4 is taken from the current DMRB;

TABLE 5 refers back to the 2011 DRMB which more usefully defines value in relation to designation.

TABLE 4: THE HIERARCHY OF VALUE/IMPORTANCE (BASED ON THE DMRB LA104 2020 TABLE 3.2N).

Value (Sensitivity) of Receptor / Resource	Typical description
Very High	Very high importance and rarity, international scale and very limited potential for substitution
High	High importance and rarity, national scale, and limited potential for substitution.
Medium	Medium or high importance and rarity, regional scale, limited potential for substitution
Low	Low or medium importance and rarity, local scale
Negligible	Very low importance and rarity, local scale.

[16] UK Holocaust Memorial in Victoria Tower Gardens in Westminster, reference APP/XF990/V/193240661.
[17] Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 9.
[18] Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 10. The sentiment is also expressed in the PPG glossary.
[19] Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 16.
[20] https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment. Paragraph 013.

TABLE 5: THE HIERARCHY OF VALUE/IMPORTANCE (BASED ON THE DMRB VOL.11 TABLES 5.1, 6.1 & 7.1).

Hierarchy of Value/Importance	
Very High	Structures inscribed as of universal importance as World Heritage Sites; Other buildings of recognised international importance; World Heritage Sites (including nominated sites) with archaeological remains; Archaeological assets of acknowledged international importance; Archaeological assets that can contribute significantly to international research objectives; World Heritage Sites inscribed for their historic landscape qualities; Historic landscapes of international value, whether designated or not; Extremely well-preserved historic landscapes with exceptional coherence, time-depth, or other critical factor(s).
High	Scheduled Monuments with standing remains; Grade I and Grade II* (Scotland: Category A) Listed Buildings; Other Listed buildings that can be shown to have exceptional qualities in their fabric or historical associations not adequately reflected in the Listing grade; Conservation Areas containing very important buildings; Undesignated structures of clear national importance; Undesignated assets of Schedulable quality and importance; Assets that can contribute significantly to national research objectives. Designated historic landscapes of outstanding interest; Undesignated landscapes of outstanding interest; Undesignated landscapes of high quality and importance, demonstrable national value; Well-preserved historic landscapes, exhibiting considerable coherence, time-depth or other critical factor(s).
Medium	Grade II (Scotland: Category B) Listed Buildings; Historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical associations; Conservation Areas containing buildings that contribute significantly to its historic character; Historic Townscape or built-up areas with important historic integrity in their buildings, or built settings (e.g. including street furniture and other structures); Designated or undesignated archaeological assets that contribute to regional research objectives; Designated special historic landscapes; Undesignated historic landscapes that would justify special historic landscape designation, landscapes of regional value; Averagely well-preserved historic landscapes with reasonable coherence, time-depth or other critical factor(s).
Low	Locally Listed buildings (Scotland Category C(S) Listed Buildings); Historic (unlisted) buildings of modest quality in their fabric or historical association; Historic Townscape or built-up areas of limited historic integrity in their buildings, or built settings (e.g. including street furniture and other structures); Designated and undesignated archaeological assets of local importance; Archaeological assets compromised by poor preservation and/or poor survival of contextual associations; Archaeological assets of limited value, but with potential to contribute to local research objectives; Robust undesignated historic landscapes; Historic landscapes with importance to local interest groups; Historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations.
Negligible	Buildings of no architectural or historical note; buildings of an intrusive character; Assets with very little or no surviving archaeological interest; Landscapes with little or no significant historical interest.
Unknown	Buildings with some hidden (i.e. inaccessible) potential for historic significance; The importance of the archaeological resource has not been ascertained.

TABLE 6: SIGNIFICANCE OF EFFECTS MATRIX (BASED ON DRMB LA 104 2020; ICOMOS 2011, 9-10).

	Value of Heritage Asset	Scale and Severity of Change/Impact				
		No Change	Negligible Change	Minor Change	Moderate Change	Major Change
		Significance of Effect or Overall Impact (either adverse or beneficial)				
Environmental Value (Sensitivity)	WHS sites that convey OUV	Neutral	Slight	Moderate/Large	Large/Very Large	Very Large
	Very High	Neutral	Slight	Moderate/Large	Large/Very Large	Very Large
	High	Neutral	Slight	Moderate/Slight	Moderate/Large	Large/Very Large
	Medium	Neutral	Neutral/Slight	Slight	Moderate	Moderate/Large
	Low	Neutral	Neutral/Slight	Neutral/Slight	Slight	Slight/Moderate
	Negligible	Neutral	Neutral	Neutral/Slight	Neutral/Slight	Slight

TABLE 7: MAGNITUDE OF IMPACT (BASED ON DMRB LA 104 2020 TABLE 3.4N).

Magnitude of Impact (Change)		Typical Description
Major	Adverse	Loss of resource and/or quality and integrity of resource; severe damage to key characteristics, features, or elements.
	Beneficial	Large scale or major improvement of resource quality; extensive restoration; major improvement of attribute quality.
Moderate	Adverse	Loss of resource, but not adversely affecting the integrity; partial loss of/damage to key characteristics, features or elements.
	Beneficial	Benefit to, or addition of, key characteristics, features, or elements; improvement of attribute quality.
Minor	Adverse	Some measurable change in attributes, quality, or vulnerability; minor loss of, or alteration to, one (maybe more) key characteristics, features, or elements.
	Beneficial	Minor benefit to, or addition of, one (maybe more) key characteristics, features, or elements; some beneficial impact on attribute or a reduced risk of negative impact occurring.
Negligible	Adverse	Very minor loss or detrimental alteration to one or more characteristics, features, or elements.
	Beneficial	Very minor benefit to or positive addition of one or more characteristics, features, or elements.
No change		No loss or alteration of characteristics, features, or elements; no observable impact in either direction.

TABLE 8: SCALES OF IMPACT AS PER THE NPPF, RELATED TO TABLE 7.

Scale of Impact		
No Change	*Neutral*	No impact on the heritage asset.
Less than Substantial Harm	*Negligible Adverse*	Where the developments may be visible or audible but would not affect the heritage asset or its setting, due to the nature of the asset, distance, topography, or local blocking.
	Minor Adverse	Where the development would have an effect on the heritage asset or its setting, but that effect is restricted due to the nature of the asset, distance, or screening from other buildings or vegetation.
	Moderate Adverse	Where the development would have a pronounced impact on the heritage asset or its setting, due to the sensitivity of the asset and/or proximity. The effect may be ameliorated by screening or mitigation.
Substantial Harm	*Substantial Adverse*	Where the development would have a severe and unavoidable effect on the heritage asset or its setting, due to the particular sensitivity of the asset and/or close physical proximity. Screening or mitigation could not ameliorate the effect of the development in these instances.
Total Loss	*Total Loss*	The heritage asset is destroyed.

Staged Investigation – Direct Impact

The staged approach for the assessment of direct impacts references the publication *Significance in Decision-Taking in the Historic Environment*[21]. The aim of this assessment is to establish the *archaeological baseline* for the site and determine the likely significance of the archaeological resource. This staged approach starts with desk-based assessment[22], may conclude with intrusive investigations, and may reference some or all of the following:

1. Documentary research (published works, primary and secondary sources in record offices).
2. Existing archaeological reports or surveys for the site.
3. Historic maps.
4. Archaeological research (historic environment records (HER), event records (HER), Historic England National List; Portable Antiquity Scheme (PLS) records, grey literature reports (available from the Archaeological Data Service).
5. Historic Landscape Characterisation (HLC).
6. Aerial photography (National Mapping Programme, historic aerial photographs (Historic England, Cambridge, Britain from Above), recent commercial photography (Google Earth)).
7. LiDAR analysis (Environment Agency data, TELLUS data).
8. Oral testimony.
9. Walkover survey (or for historic buildings, a historic building appraisal[23]).
10. Geophysical survey, if suitable (magnetometry, electrical resistance, ground-penetrating radar)[24].

[21] Historic England 2015: Managing Significance in Decision-Taking in the Historic Environment*: Historic Environment Good Practice Advice in Planning Note 2.*
[22] CIfA 2014 updated 2020: *Standard and guidance for historic environment desk-based assessment*.
[23] Historic England 2016: Understanding Historic Buildings: A Guide to Good Recording Practice.

11. Archaeological trench evaluation[25], if appropriate.

Following the conclusion of this staged process, an assessment of the archaeological potential of the site is produced and (if appropriate) recommendations made, including for further investigation, analysis, and publication to be undertaken, as mitigation for the proposed development. This document will normally only cover Items 1-10.

Type of Impact

Developments can readily be divided into several phases which are marked by different types and level of impact. However, the only one relevant to direct impact is the *construction phase.* Construction works have direct, physical effects on the buried archaeology of a site. Direct effects may extend beyond the nominal footprint of a site e.g. where related works or site compounds are located off-site. *Operational* and *decommissioning* phases are only relevant where elements of the buried archaeological resource survive, but in most instances (excluding PV sites and wind turbines), these impacts are permanent and irreversible.

Staged Investigation – Indirect Impact

The staged approach for the assessment of indirect impacts references the *Setting of Heritage Assets*[26]. The aim of this assessment is to identify the designated heritage assets outside the redline boundary that might be impacted upon by the proposed development, determine if an effect on their significance via setting is possible, and establish the level of impact. The staged approach advocated by GPA3 contains the following steps[27]:

6. Identify which heritage assets and their settings are affected.
7. Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.
8. Asses the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it.
9. Explore ways to maximise enhancement and avoid or minimise harm.
10. Make and document the decision and monitor outcomes.

Step one is to identify the designated heritage assets that might be affected by the development. The first stage of that process is to determine an appropriate search radius, and this would vary according to the height, size and/or prominence of the proposed development. For instance, the search radius for a wind turbine, as determined by its height and dynamic character, would be much larger than for a single house plot or small agricultural building. For this assessment, the second part of the process is to examine the heritage assets within the search radius and assign them to one of three categories:

- Category #1 assets: Where proximity to the proposed development, the significance of the heritage asset concerned, or the likely magnitude of impact, demands detailed consideration.
- Category #2 assets: Assets where location and current setting would indicate that the impact of the proposed development is likely to be limited, but some uncertainty remains.
- Category #3 assets: Assets where location, current setting, significance would strongly indicate the impact would be no higher than negligible and detailed consideration both unnecessary and disproportionate. These assets are scoped out of the assessment but may still be listed in the impact summary table.

Dependant on the nature of the development, this work may be informed, but not governed, by a generated ZTV (zone of theoretical visibility).

Pursuant to *Steps Two* and *Three*, a series of site visits are made to the designated heritage assets of Categories #1 and #2. Each asset is considered separately and appraised on its significance, condition, and setting/context by the assessor. The potential impacts the development are assessed for each location, taking into account site-specific factors and the limitations of that assessment (e.g. no access, viewed from the public road etc.). Photographic and written records are compiled during these visits. If a ZTV has been used in the assessment, the accuracy of the ZTV is corroborated with reference to field observations.

Step 4 is possible where the required information is available from the developer/client/agent, and where design is

[24] CIfA 2014 updated 2020: *Standard and guidance for archaeological geophysical survey*. Schmidt, A., Linford, P. Linford, N. David, A, Gaffney, C., Sarris, A. & Fassbinder, J. 2016: *EAC Guidelines for the Use of Geophysics in Archaeology*.
[25] CIfA 2014 updated 2020: *Standard and guidance for archaeological field evaluation*.
[26] Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 9.
[27] Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 9.

an iterative process rather than *fait accompli*. In many instances, adverse outcomes (and more rarely, beneficial outcomes) are unavoidable, as mitigation would have to take place at the heritage asset concerned or within an intervening space, and not the proposed site itself.

Assessment and documentation, *Step 5*, takes place within this document. The individual asset tables are completed for each assessed designated heritage asset, and, with an emphasis on practicality and proportionality,[28] assets are grouped by category (e.g. churches, historic settlements, funerary remains etc.) and provided with a generic preamble that avoids repetitious narrative. This initial preamble establishes the baseline sensitivity of a given category of monument or building to the potential effect; the individual entries that follow then elaborate on local circumstance and site-specific factors. The individual assessments are to be read in conjunction with the overall discussion, as the assessment of impact is reflection of both.

As discussed (elsewhere, this document), the critical assessment is to determine the contribution of setting to the significance of the heritage asset, and/or the ability of the setting to facilitate an appreciation of that significance. Views are important but not paramount, and views to and from a proposed development can exist without adverse effect. Some assets are intrinsically more sensitive to change in their environment than others; a useful shorthand for this can be found in TABLE 9.

TABLE 9: IMPORTANCE OF SETTING TO INTRINSIC SIGNIFICANCE.

Importance of Setting to the Significance of the Asset	
Paramount	Examples: Round barrow; follies, eye-catchers, stone circles
Integral	Examples: Hillfort; country houses
Important	Examples: Prominent church towers; war memorials
Incidental	Examples: Thatched cottages
Irrelevant	Examples: Milestones

Type of Impact

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

Construction Phase

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

Operational Phase

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

Decommissioning Phase

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

Group Assessment

Individual assessments give some indication as to how a development may affect a particular cottage, historic park, or hillfort, but collective assessment are also necessary, reflecting the effect on the historic environment in general.

Cumulative Impact

A single development will have a direct physical and an indirect visual impact, but a second and a third site in the

[28] Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraphs 2, 17, 19, 21, 23, 41.

same area will have a synergistic and cumulative impact above and beyond that of a single site. PPG states[29]: *When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.*

GPA3 states[30]: *Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it*.

However, the cumulative impact of a proposed development can be difficult to determine, as consideration must be given to consented and pre-determination proposals as well as operational or occupied sites.

Aggregate Impact

A single development will usually affect multiple individual heritage assets. In this assessment, the term *aggregate impact* is used to distinguish this from cumulative impact. In essence, this is the impact on the designated parts of the historic environment as a whole, rather than multiple developments on a single asset.

Definitions

Heritage Assets

The NPPF Glossary defines heritage assets as: *A building, monument, site, place, area, or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)*[31]. This is a fairly broad definition for an expanding range of features, as what is considered of little heritage interest today may – due to location, rarity, design, associations, etc. – be considered of heritage value in the future.

Significance

The NPPF Glossary defines significance as: *The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic, or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting*[32].

Conservation Principles

In making an assessment, this report adopts the conservation values (*evidential*, *historical*, *aesthetic* and *communal*) laid out in the English Heritage 2008 publication *Conservation Principles*[33]. These are used to determine and express the relative importance of a given heritage asset. The definition of those terms is summarised below:

Evidential Value

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

Historical Value

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

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

[29] https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment. Paragraph 013.
[30] Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 9.3.
[31] https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary.
[32] https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary.
[33] English Heritage 2008: *Conservation Principles: policies and guidance for the sustainable management of the historic environment*.

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

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

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

Aesthetic Value

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

Design value relates primarily to the aesthetic qualities generated by the conscious design of a building, structure, or landscape; it incorporates composition, materials, philosophy, and the role of patronage. It may have associational value, if undertaken by a known architect or landscape gardener, and its importance is enhanced if it is seen as innovative, influential or a good surviving example. Landscape parks, country houses and model farms all have design value. The landscape is not static, and a designed feature can develop and mature, resulting in the 'patina of age'.

Some aesthetic value developed fortuitously over time as the result of a succession of responses within a particular cultural framework e.g. the seemingly organic form of an urban or rural landscape or the relationship of vernacular buildings and their materials to the landscape. Aesthetic values are where a proposed development usually has their most pronounced impact: the indirect effects of most developments are predominantly visual or aural and can extend many kilometres from the site itself. In many instances the impact of a development is incongruous, but that is itself an aesthetic response, conditioned by prevailing cultural attitudes to what the historic landscape should look like.

Communal Value

Communal value (togetherness) is derived from the meaning a place holds for people and may be closely bound up with historical/associative and aesthetic values; it can be commemorative, symbolic, social, or spiritual.

Commemorative and symbolic value reflects the meanings of a place to those who draw part of their identity from it, or who have emotional links to it e.g. war memorials. Some buildings or places (e.g. the Palace of Westminster) can symbolise wider values. Other places (e.g. Porton Down Chemical Testing Facility) have negative or uncomfortable associations that nonetheless have meaning and significance to some and should not be forgotten. Social value need not have any relationship to surviving fabric, as it is the continuity of function that is important. Spiritual value is attached to places and can arise from the beliefs of a particular religion or past or contemporary perceptions of the spirit of place. Spiritual value can be ascribed to places sanctified by hundreds of years of veneration or worship, or wild places with few signs of modern life. Value is dependent on the perceived survival of historic fabric or character and can be very sensitive to change. The key aspect of communal value is that it brings specific groups of people together in a meaningful way.

Significance in the NPPF

The NPPF operates on a slightly differently set of criteria to the Conservation Principles, a divergent trajectory that will doubtless be addressed when the Conservation Principles are revised. Under the NPPF, value is expressed as *archaeological interest*, *architectural and artistic interest*, and *historic interest*. The following is taken from the NPPF PPG[34] document, followed by commentary:

[34] https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment. Paragraph 006.

Archaeological Interest

As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point. This interest most closely accords with evidential value. While it usefully extends that definition to include known elements, the emphasis on *archaeological* interest unhelpfully seems to preclude the built environment.

Architectural and Artistic Interest

These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture. This interest most closely accords with aesthetic value, but the use of the term *architectural* seems prejudiced against vernacular forms of built heritage, and fortuitous aesthetics.

Historic Interest

An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity. This interest most closely accords with historical value, and extends to include communal value, though with diminished emphasis.

Concepts from World Heritage Guidance

World Heritage Sites are assessed with reference to their own, non-statutory, guidance[35]. This includes the useful concepts of *authenticity* and *integrity*[36]:

Authenticity

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

Integrity

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

Designated Heritage Assets

The majority of the most important ('nationally important') heritage assets are protected through *designation*, with varying levels of statutory protection. These assets fall into one of six categories, although designations often overlap, so a Listed early medieval cross may also be Scheduled, lie within the curtilage of Listed church, inside a Conservation Area, and on the edge of a Registered Park and Garden that falls within a world Heritage Site. The NPPF Glossary defines a designated heritage asset as: *A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation*[37]*.*

Listed Buildings

A Listed building is an occupied dwelling or standing structure which is of special architectural or historical interest. These structures are found on the *Statutory List of Buildings of Special Architectural or Historic Interest.* The status of Listed buildings is applied to 300,000-400,000 buildings across the United Kingdom. Recognition of the need to

[35] ICOMOS 2011: *Guidance on Heritage Impact Assessment for Cultural World Heritage Properties: a publication of the international Council on Monuments and Sites*.
[36] UNESCO 2021: *Operational Guidelines for the Implementation of the World Heritage Convention*. Paragraphs 79-95.
[37] https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary.

protect historic buildings began after the Second World War, where significant numbers of buildings had been damaged in the county towns and capitals of the United Kingdom. Buildings that were considered to be of 'architectural merit' were included. The Inspectorate of Ancient Monuments supervised the collation of the list, drawn up by members of two societies: The Royal Institute of British Architects and the Society for the Protection of Ancient Buildings. Initially the lists were only used to assess which buildings should receive government grants to be repaired and conserved if damaged by bombing. The *Town and Country Planning Act 1947* formalised the process within England and Wales, Scotland and Ireland following different procedures. Under the 1979 *Ancient Monuments and Archaeological Areas Act* a structure cannot be considered a Scheduled Monument if it is occupied as a dwelling, making a clear distinction in the treatment of the two forms of heritage asset. Any alterations or works intended to a Listed Building must first acquire Listed Building Consent, as well as planning permission. Further phases of 'listing' were rolled out in the 1960s, 1980s and 2000s; English Heritage advise on the listing process and administer the procedure, in England, as with the Scheduled Monuments.

Some exemption is given to buildings used for worship where institutions or religious organisations (such as the Church of England) have their own permissions and regulatory procedures. Some structures, such as bridges, monuments, military structures, and some ancient structures may also be Scheduled as well as Listed. War memorials, milestones and other structures are included in the list, and more modern structures are increasingly being included for their architectural or social value.

Buildings are split into various levels of significance: Grade I (2.5% of the total) representing buildings of exceptional (international) interest; Grade II* (5.5% of the total) representing buildings of particular (national) importance; Grade II (92%) buildings are of merit and are by far the most widespread. Inevitably, accuracy of the Listing for individual structures varies, particularly for Grade II structures; for instance, it is not always clear why some 19th century farmhouses are Listed while others are not, and differences may only reflect local government boundaries, policies and individuals.

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

Conservation Areas

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

Scheduled Monuments

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

Registered Parks and Gardens

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

the assessment.

Registered Battlefields

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

World Heritage Sites

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

Setting

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

The NPPF Glossary defines the setting of a heritage asset as: *The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral*[38].

The principal guidance on this topic is contained within one publication: *The Setting of Heritage Assets: Good Practice Advice 3*[39]. Where the impact of a proposed development is largely indirect, the importance of the setting to the significance of the heritage asset becomes the primary consideration of the impact assessment. The following extracts are from GPA3[40]:

The NPPF makes it clear that the extent of the setting of a heritage asset 'is not fixed and may change as the asset and its surroundings evolve'. Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated (see below Designed settings). Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.

While setting can be mapped in the context of an individual application or proposal, it cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time, and because new information on heritage assets may alter what might previously have been understood to comprise their setting and the values placed on that setting and therefore the significance of the heritage asset.

There are two ways in which change within the setting of a heritage asset may affect its significance:

- Where the setting of the heritage asset contributes to the significance of the heritage asset (e.g. the historic park around the stately home; the historic streetscape to the Listed shopfronts).
- Where the setting contributes to the ability to appreciate the significance of the heritage asset (e.g. clear views to a principal façade; well-kept garden to a Listed cottage).

GPA3 states: *The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place...*[41] *The Setting of Heritage Assets*[42] lists a number of instances where views contribute to the particular significance of a heritage asset:

- Those where the composition within the view was a fundamental aspect of the design or function of the heritage asset.

[38] https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary.
[39] Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.).
[40] Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraphs 8, 9.
[41] Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 10.
[42] Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 11.

- Those where town- or village-scape reveals views with unplanned or unintended beauty.
- Those with historical associations, including viewing points and the topography of battles.
- Those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected.
- Those where relationships between the asset and other heritage assets or natural features or phenomena such as solar or lunar events are particularly relevant.
- Those assets, whether contemporaneous or otherwise, which were intended to be seen from one another for aesthetic, functional, ceremonial, or religious reasons, including military and defensive sites, telegraphs or beacons, prehistoric funerary and ceremonial sites, historic parks and gardens with deliberate links to other designed landscapes and remote 'eye-catching' features or 'borrowed' landmarks beyond the park boundary.

However, as stated in PPG[43]: *Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.*

Furthermore, as stated in GPA3[44]: *Similarly, setting is different from general amenity. Views out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting.*

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

In addition, visibility alone is no clear guide to visual impact. People perceive size, shape and distance using many cues, so context is critically important. For instance, research on electricity pylons[45] has indicated scenic impact is influenced by landscape complexity: the visual impact of pylons is less pronounced within complex scenes, especially at longer distances, presumably because they are less of a focal point and the attention of the observer is diverted. There are many qualifiers that serve to increase or decrease the visual impact of a proposed development, some of which are seasonal or weather-related.

Thus, the principal consideration of assessment of indirect effects cannot be visual impact *per se*. It is an assessment of the likely magnitude of effect, the importance of setting to the significance of the heritage asset, and the sensitivity of that setting to the visual or aural intrusion of the proposed development.

GPA3 also details other area concepts that exist in parallel to, but separate from, setting. These are *curtilage*, *historic character*, and *context*[46].

Curtilage

Curtilage is a legal term describing an area around a building and, for listed structures, the extent of curtilage is defined by consideration of ownership, both past and present, functional association and layout. The setting of a heritage asset will include, but generally be more extensive than, its curtilage. The concept of curtilage is relevant to Listed Building Consent, and where development occurs within the immediate surroundings of the Listed structure.

Historic Character

The historic character of a place is the group of qualities derived from its past uses that make it distinctive. This may include: its associations with people, now and through time; its visual aspects; and the features, materials, and spaces associated with its history, including its original configuration and subsequent losses and changes. Character is a broad concept, often used in relation to entire historic areas and landscapes, to which heritage assets and their settings may contribute. The concept of character area[47] can be relevant to developments where

[43] https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#assess-substantial-harm. Paragraph 013.
[44] Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 16.
[45] Hull, R.B. & Bishop, I.D. 1988: 'Scenic Impacts of Electricity Transmission Towers: the influence of landscape types and observer distance', *Journal of Environmental Management* 27, 99-108.
[46] Historic England 2017: *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd ed.). Paragraph 7.
[47] Historic England 2017: *Understanding Place: Historic Area Assessments*.

extensive areas designations (Registered Parks and Gardens, Registered Battlefields, Conservation Areas, and World Heritage Sites; also towns and larger villages) are divisible into distinct character areas that a development may impact differently due to proximity, visibility etc.

Context

The context of a heritage asset is a non-statutory term used to describe any relationship between it and other heritage assets, which is relevant to its significance, including cultural, intellectual, spatial or functional. Contextual relationships apply irrespective of distance, sometimes extending well beyond what might be considered an asset's setting, and can include the relationship of one heritage asset to another of the same period or function, or with the same designer or architect. A range of additional meanings is available for the term 'context', for example in relation to archaeological context and to the context of new developments, as well as customary usages. Setting may include associative relationships that are sometimes referred to as 'contextual'. This concept is a useful, though non-statutory one, as heritage assets may have a relationship with the surrounding landscape that is non-visual and based e.g. on their historical economy. This can be related to landscape context (below), but which is a physically deterministic relationship.

Landscape Context

The determination of *landscape context* is an important part of the assessment process. This is the physical space within which any given heritage asset is perceived and experienced. The experience of this physical space is related to the scale of the landform and modified by cultural and biological factors like field boundaries, settlements, trees, and woodland. Together, these contribute to local character and extent of the setting.

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

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

Principal Views, Landmark Assets, and Visual Impact

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

On a landscape scale views, taken in the broadest sense, are possible from anywhere to anything, and each may be accorded an aesthetic value according to subjective taste (this is the *amenity value* of views[48]). Given that terrain, the biological and built environment, and public access restrict our theoretical ability to see anything from anywhere, in this assessment the term *principal view* is employed to denote both the deliberate views created within designed landscapes, and those fortuitous views that may be considered of aesthetic value and worth preserving, where they contribute to significance.

It should be noted, however, that there are distance thresholds beyond which perception and recognition fail, and this is directly related to the scale, height, massing, and nature of the heritage asset in question. For instance, beyond 2km the Grade II cottage comprises a single indistinct component within the wider historic landscape,

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

whereas at 5km or even 10km a large stately home or castle may still be recognisable. By extension, where assets cannot be seen or recognised i.e. entirely concealed within woodland, or too distant to be distinguished, then visual harm to setting is moot. To reflect this emphasis on recognition, the term *landmark asset* is employed to denote those sites where the structure (e.g. church tower), remains (e.g. earthwork ramparts) or – in some instances – the physical character of the immediate landscape (e.g. a distinctive landform like a tall domed hill) make them visible on a landscape scale. In some cases, these landmark assets may exert landscape *primacy*, where they are the tallest or most obvious man-made structure within line-of-sight. However, this is not always the case, typically where there are numerous similar monuments (multiple engine houses in mining areas, for instance) or where modern developments have overtaken the heritage asset in height and/or massing.

Where a new development has the potential to *visually dominate* a heritage asset, even if the contribution of setting to the significance of a heritage asset is minimal, it is likely to impact on the ability of setting to facilitate an appreciation of the heritage asset in question and can be regarded as an adverse effect.

Visibility alone is not a clear guide to visual impact. People perceive size, shape and distance using many cues, so context is critically important. For instance, research on electricity pylons (Hull & Bishop 1988) has indicated scenic impact is influenced by landscape complexity: the visual impact of pylons is less pronounced within complex scenes, especially at longer distances, presumably because they are less of a focal point and the attention of the observer is diverted. There are many qualifiers that serve to increase or decrease the visual impact of a proposed development, some of which are seasonal or weather-related.

ARCHAEOLOGICAL SERVICES & HISTORIC BUILDING RECORDING
SOUTHWEST ARCHAEOLOGY

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

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