LAND AT THE KARMA HOTEL
ST MARTIN'S
ISLES OF SCILLY
CORNWALL

RESULTS OF AN ARCHAEOLOGICAL ASSESSMENT

SOUTH WEST ARCHAEOLOGY LTD. REPORT NO. 181107

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LAND AT THE KARMA HOTEL, ST MARTIN'S, ISLES OF SCILLY, CORNWALL

RESULTS OF AN ARCHAEOLOGICAL ASSESSMENT

By J. Bampton
Report Version: FINAL

Draft issued: 7th November 2018
Finalised: 8th November 2018

Work undertaken by SWARCH for Evans Jones Ltd. (The Agent)
On behalf of The Karma Group (The Client)

SUMMARY

This report presents the results of an archaeological assessment undertaken on land at the Karma Hotel, St Martin's, Isles of Scilly, Cornwall. This work was undertaken pre-planning to inform on an appropriate condition for the development of stationing six glamping tents on a seasonal basis.

The historic background to the site and the Historic Environment Record indicate the potential for prehistoric activity on the proposed site. The cairn cemetery at Tinkler's Hill and prehistoric findspots nearby are paramount in this assessment. The presence of prehistoric finds including flints and pottery near to the site illustrate the potential for topsoil (or deeper) finds to be recovered from the site during any groundworks that break the surface. Such stray finds allude to the presence of other archaeological features or deposits in the area. The archaeological potential of the site is assessed as ***High****.*

In terms of indirect impacts, the key designated assets are all located within 450m of the site. The most significant of which, Tinkler's Hill, is within c.110m. None of these Scheduled and undesignated assets would have direct inter-visibility with the proposed site, due to screening from woodland and topographic restrictions. The proposals can therefore not impact upon their settings or significance in any meaningful way. A speculatively assigned cairn near to the site and listed as part of the Tinkler's Hill cemetery was not identified during the walkover survey and either does not exist or was located within overgrown scrub outside the proposed development area, as well as possibly lacking any surviving landmark presence. The effect of the planned development on these assets would be ***neutral*** *to* ***negligible****.*

Any proposed building on the site would need to be low enough not to compete with the existing tree line of the surrounding rhododendron wooded areas so as not to encroach on views from the cairn/look-out to the north-east, on Tinkler's Hill.

With this in mind, the overall impact of the proposed development on the historic landscape can be assessed as ***negligible****. The impact of the development on the buried archaeological resource would be* ***permanent*** *and* ***irreversible****, should significant groundworks occur. However, no significant works are planned as part of the proposed development. If groundworks do occur, these could be mitigated through an archaeological monitoring and recording (watching brief) condition.*

November 2018

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ACKNOWLEDGMENTS

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1.0 INTRODUCTION

LOCATION: LAND AT THE KARMA HOTEL
PARISH: ST MARTIN'S
COUNTY: CORNWALL
NGR: SV 91579 16262
PLANNING NO. PRE-PLANNING
SWARCH REF. SMKH18

1.1 PROJECT BACKGROUND

This report presents the results of an archaeological assessment carried out by South West Archaeology Ltd. (SWARCH) on land at the Karma Hotel, St Martin's, Isles of Scilly, Cornwall (Figure 1). The work was commissioned by Evans Jones Ltd (The Agent) on behalf of The Karma Group (the Client) in order to assess any direct and indirect heritage impacts (HIA) on the settings of nearby heritage assets and the likelihood of buried archaeological remains that might be affected by the proposed development of the site. The work was carried out in accordance with best practice, CIfA guidelines and Historic England Guidance.

1.2 TOPOGRAPHICAL AND GEOLOGICAL BACKGROUND

The Scilly Isles are an archipelago of islands *c.*45km west-south-west of Cornwall. The site is located at the west end of *St Martin's* island, on the north side of the archipelago. The site is located on a south-south-west facing slope that becomes very steep within *c.*60m to the rear-/east of the Karma Hotel and *c.*100m west-north-west of *Lower Town*. The site was at a height of *c.*27m AOD.

The underlying bedrock is comprised of granite of the Isles of Scilly Intrusion (BGS 2018). The soils of the area across the site are the well drained gritty loamy soils with a humose surface horizon in places of the Moretonhampstead Association on the upper slopes; and the gritty loamy very acid soils with a wet peaty surface horizon of the Hexworthy Association on the steep and lower slopes (SSEW 1983).

1.3 HISTORICAL BACKGROUND

According to Lysons (1814) the Isles of Scilly were recorded by the Greeks as *Hesperides* and *Cassiterides*; and by the Romans as *Sillinæ* and *Silurcæ Insulæ*. The Greek names possibly referring to the Islands association with the tin and some copper and lead have been found in the islands; cassiterite being associated with tin. It suffered a 12th century attack from the Vikings according to the 13th century Orkneyinga Saga (Anderson 1893). The archipelago consists of 27 rocks, islets and islands and takes its name from a small island, less than 0.5ha originally recorded as *Sully* or *Sulley*. In the 10th century the Scilly Islands were 'subdued' by King Athelstan (Lysons 1814). During the civil war the islands briefly housed and protected Prince Charles in 1645 and in 1649 the royalist Sir John Grenville fortified the islands and harassed Parliamentary traders. Parliamentarians then took and fortified Tresco and Bryer before taking St Mary's. The islands were apparently garrisoned with 800 men (Lysons 1814). In the mid 11th century some of the islands and all the tithes were given to monks or hermits on Tresco (*St Nicholas* at the time).In *c.*1193 the king and Pope Celestin granted the churches of the Scilly's to the abbot of Tavistock, although the Earl of Cornwall maintained influence and the monks/hermits held some rights including over certain shipwrecks. The Earl of Cornwall and the abbots of Tavistock were called the 'Lords of the Scilly's'; *Domini de Scilly*.

An undated deed names Robert de Wick as a proprietor of the Isles from the Earl and in the 13th century a Drugo de Barentin was governor. In the late 13th century and through the 14th century The Blanchminster family governed the Isles, and were then represented by the Coleshill family. In the late 15th century the Davers and Whittington families governed the Isles on behalf of the Arundell family who had inherited the estate. In the mid 16th century the Lord Admiral, Thomas Lord Seymour had been proprietor on behalf of the King until he was beheaded and the Islands went to the Duchy of Cornwall; the church lands having already been conceded to the crown after the dissolution. The Godolphin family then governed and became the lessees of the Islands from the Duchy from the mid 16th century into the 19th century. Lysons (1814) implies that the chapel at St Martin's was probably built by the Godolphin family after the reformation. Between 1750 and 1814 the population of the Scilly's rose from *c.*1,400 to *c.*2,358 (Lysons 1814) in the 2011 census the islands had a population of 2,203. Although there is some arable and pastoral agriculture on the islands, the principle industry historically, or least in *c.*1800 was fishing and making kelp. Recently tourism has become more popular across the islands.

A large number of archaeological assessments have been conducted regarding the Scilly Isles since the late 1980s, which include more historical details (Ratcliffe 1988; Ratcliffe & Straker 1996; Johns *et al* 2004; Johns 2012). The 2012 research framework (Johns) provides a comprehensive summary of archaeology and background for the Isles of Scilly as a whole.

St Martin's (*Seynt Martyns/St Martines* Isle *c.*1540) is named for the dedication of the church but in the early 14th century had been referred to as *Bechiek/Brethiek* meaning 'the place with arms/the island of promontories' from the Cornish *bregh* meaning 'arm' and ending *-ek* referring to the shape of the island (Watts 2004). Despite its size and the archaeological evidence to the contrary, Lysons (1814) claims that St Martin's was not inhabited until the 17th century, during the reign of Charles II. In 1683 a Mr Elkins built a large day-mark tower on the east end of the island and in *c.*1684 a Mr Nance introduced the process of making kelp to the islands. In 1756 St Martin's had 18 related families and in 1814 235 inhabitants.

1.4 ARCHAEOLOGICAL BACKGROUND

Previous archaeological works have been conducted on St Martin's near to the site by Cornwall Archaeological Unit (CAU) (Young 1993; Ratcliffe 1997) as well as an assessment of the early environment of Scilly (Ratcliffe and Straker 1996) and earlier service trenching works in the mid-1980s (Ratcliffe and Thorpe 1991). Numerous other assessments and environmental surveys of the Scilly Isles have also been conducted. The excavation services running along the north side of Lower Town to water storage tanks on the west side of the proposed development area revealed a relative concentration of pottery (×8 sherds) and ×2 flakes of struck flint all of a probable Late Bronze Age date from immediately south of the proposed development site (Youngs 1993). In 1985, Late Neolithic/Early Bronze Age worked flint (*c.*61 fragments) was revealed from Higher Town to Lower Town during groundworks (Ratcliffe and Thorpe 1991). A telecommunications trench was excavated at Lower Town in 1992 (Ratcliffe 1997) revealed, *c.*100m south-south-east of the site; an early medieval Christian burial (11th-13th century); a palaeoenvironmentally rich medieval midden containing 10th-13th century pottery types; and ×11 possible Early Neolithic pieces of worked flint including an awl.

The Cornwall and Scilly Historic Environment Record (HER) lists a single Listed building within 1km of the site, the Grade II Listed 19th century Ashvale Farmhouse (List entry no.1141203/HER ref.DCO14293); and eight Scheduled Ancient Monuments (List Entry No.1013810; 1016178; 1016179; 1018109; 1018110; 1018111; 1018112; 1018113). These are within a list of 114 assets within 1km of the site of predominantly prehistoric cairns, field-systems and findspots (many

within the scheduled Ancient Monuments), and post-medieval activity associated with settlement, field-systems and kelp processing.

1.5 METHODOLOGY

This work was undertaken in accordance with recognised best practice and was informed by a consultation response by Cornwall Archaeology Unit. The desk-based assessment follows the guidance as outlined in: *Standard and Guidance for Archaeological Desk-Based Assessment* (CIfA 2014) and *Understanding Place: historic area assessments* (Historic England 2017).

The heritage 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 *Guidelines for Landscape and Visual Impact Assessment* 3rd Edition (Landscape Institute 2013).

FIGURE 1: SITE LOCATION; THE SITE IS INDICATED.

2.0 HERITAGE IMPACT ASSESSMENT

2.1 HERITAGE IMPACT ASSESSMENT - OVERVIEW

The purpose of a 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 Department of Transport (DoT) guidance (DMRB vol.11; WEBTAG), used in conjunction with the ICOMOS (2011) guidance and the staged approach advocated in *The Setting of Heritage Assets* (GPA3 Historic England 2015). The methodology employed in this assessment can be found in Appendix 1.

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 2018). The relevant guidance is reproduced below:

Paragraph 189
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 190
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.

2.3 LOCAL POLICY

Policy 24: *Historic Environment* in *The Cornwall Local Plan: Strategic Policies 2010-2030* makes the following statement:

All development proposals should be informed by proportionate historic environment assessments and evaluations... identifying the significance of all heritage assets that would be affected by the proposals and the nature and degree of any affects and demonstrating how, in order of preference, any harm will be avoided, minimised or mitigated.

Great weight will be given to the conservation of Cornwall's heritage assets... Any harm to the significance of a designated or non-designated heritage asset must be justified... In those exceptional circumstances where harm to any heritage assets can be fully justified, and the development would result in the partial or total loss of the asset and/or its setting, the applicant will be required to secure a programme of recording and analysis of that asset, and archaeological excavation where relevant, and ensure the publication of that record to an appropriate standard in public archive.

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.

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 3.2-3.3 examine the documentary, cartographic and archaeological background to the site; Section 3.4 details the results of the walkover survey undertaken. Section 3.5 summarises this information in order to determine the significance of the archaeology, the potential for harm, and outlines mitigation strategies as appropriate. Appendix 1 details the methodology employed to make this judgement.

3.2 CARTOGRAPHIC DEVELOPMENT

3.2.1 GRAEME SPENCE'S MAP OF 1792

The earliest accurate cartographic source available to this study showing the site is Graeme Spence's survey of the Isles of Scilly of 1792 (Figure 2). This shows the key sites and landmarks of St Martin's including the locations of Higher-, Middle- and Lower Town and topographic features. It shows no depiction of trackways or field systems and was more focused on navigation between the islands as opposed to on them. The steep ridge at the edge of the site that leads down to the coastal zone and the hotel is clearly denoted and the landmark of a cairn and *Tinkler's Point* to the north of the site. It does not show any structures or landmark features at the site or location of the existing Karma Hotel.

FIGURE 2: EXTRACT FROM THE 1792 GRAEME SPENCE SURVEY MAP OF THE SCILLY ISLES. THE APPROXIMATE SITE LOCATION IS INDICATED.

3.2.2 MID 18TH CENTURY MAPPING

Tithe maps and apportionments from *c.*1847 were prepared for the Isles of Scilly, although much of the Isles were not subject to the tithe survey. Tresco and St Mary's were included, each island a single large plot that was owned by the Prince of Wales as the Duke of Cornwall and leased/occupied by Augustus Smith. Walter Cooper Dendy's depiction of St Martin's from 1857 (Figure 3) denotes the location of the three villages on St Martin's; showing a church at Middle Town and implying that Lower Town is along two parallel streets with markings one above the other. There is very little detail on this mapping.

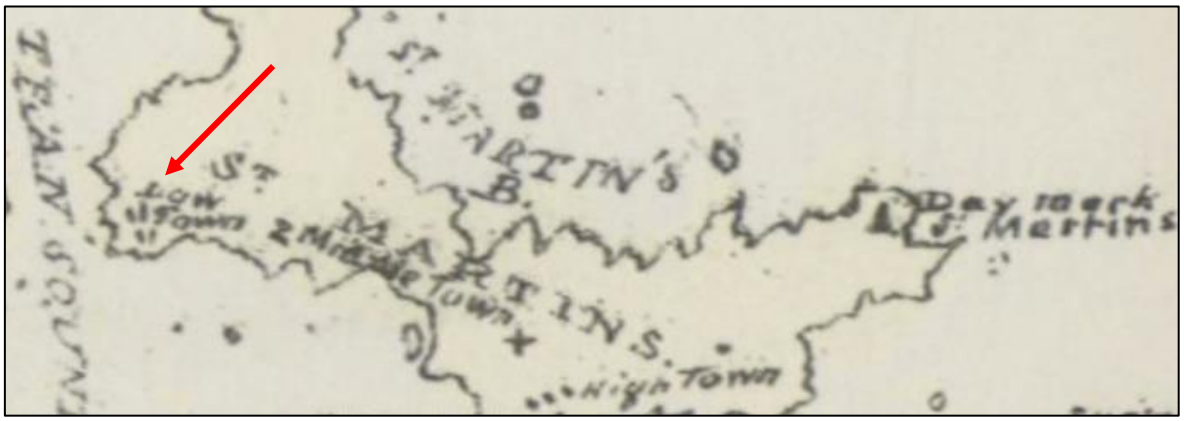

FIGURE 3: EXTRACT FROM 'THE BEAUTIFUL ISLETS OF BRITAINE', 1857; THE APPROXIMATE LOCATION OF THE SITE IS INDICATED.

3.2.3 ORDNANCE SURVEY MAPPING

The 1889 first edition Ordnance Survey (OS) map (Figure 4) gives a detailed depiction of St Martin's showing established route-ways, roads, buildings and archaeological and topographic landmarks such as the *tumuli* on *Tinkler's Hill*. The site is shown as rough unenclosed ground between footpaths leading from the west end of Lower Town to *Tinkler's Hill* and *Tinkler's Point*. The footpath along the west-south-west edge of the site runs along the edge of very steep ground shown as a long field with slight curved boundaries. On the south-west of this field/slope is a dashed-squared off parcel of land in the approximate location of the current hotel, at the south end of which is depicted two buildings with a possible shed near the middle of the area. *Tumuli* are depicted to the north-east of the site, including a bench-mark at a high vantage point. A possible cairn earthwork is depicted just to the east of the proposed site.

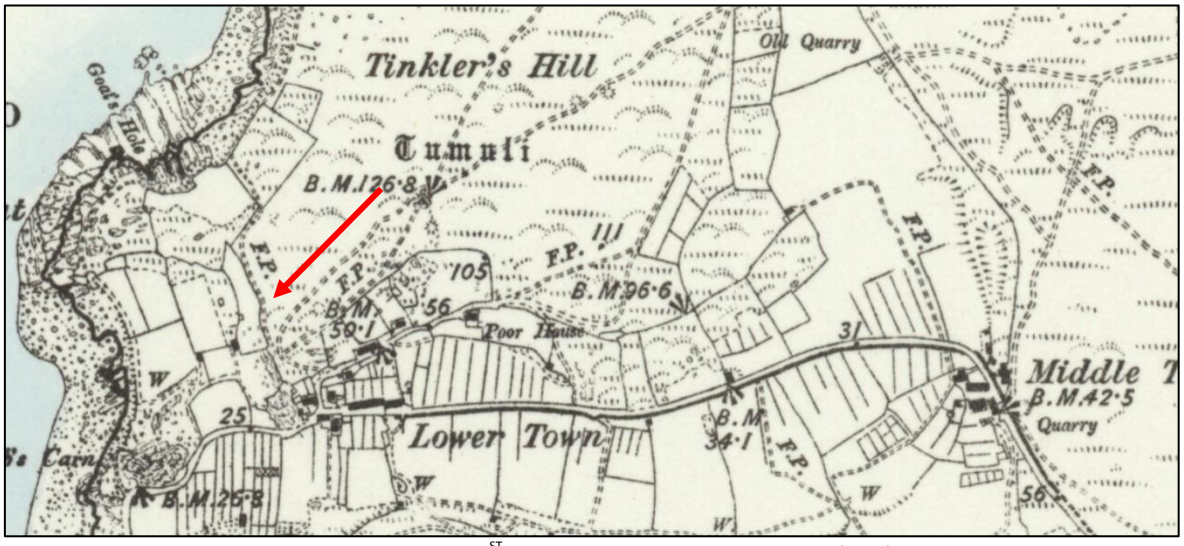

FIGURE 4: EXTRACT FROM THE ORDNANCE SURVEY 1ST EDITION 6INCH SERIES, 1889 MAP (NLS). THE APPROXIMATE LOCATION OF THE SITE IS INDICATED.

The second edition OS map, 1908 (Figure 5) shows general continuity with the first edition regarding the landscape of the site and to its north, and of the development of Lower Town. The field system along the route between Lower Town and Middle Town has been extended northwards and appears to have been increased or improved along the south side of the route-way. The buildings in the location of the current hotel appear to have been removed and some field boundaries in this area have been added. The site itself remains unchanged; showing no features or structures.

Subsequent OS mapping shows continuity through most of the 20th century. OS mapping published in 1963 includes hachure's that denote the steep slope on the west-south-west side of the proposed development area and to the rear of where the current hotel will be built. The 1980 OS mapping includes two notable changes; firstly the earthwork just east of the proposed sight on earlier mapping is no longer depicted; and secondly, although the current hotel has still not been built a track has been developed that runs along the rear of the property, at the foot of the steep slope south-west along the south-west boundary of the proposed site.

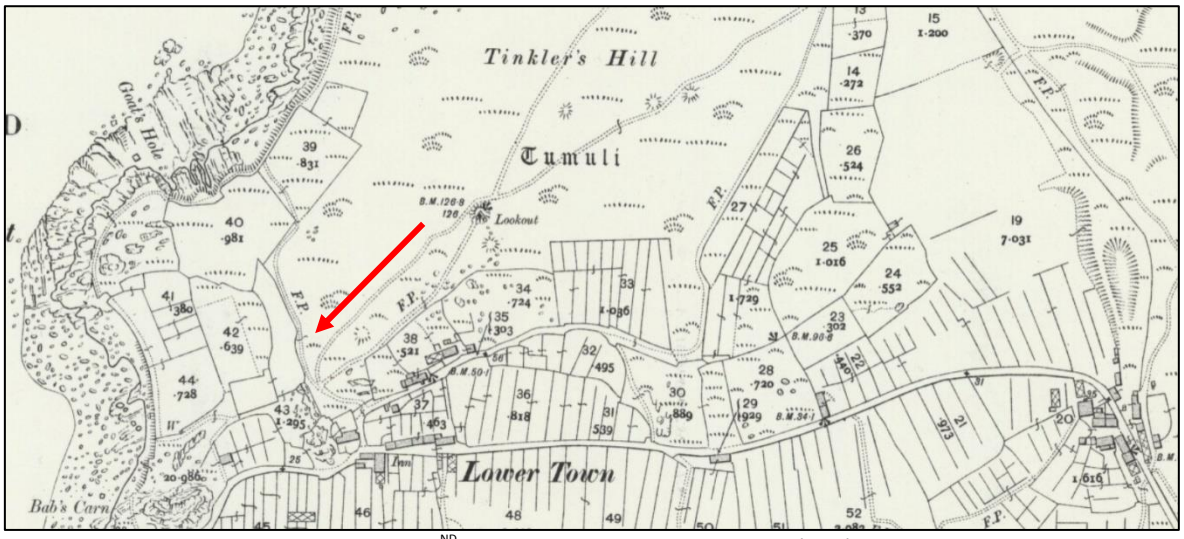

FIGURE 5: EXTRACT FROM ORDNANCE SURVEY 2ND EDITION 25INCH SERIES, 1908 MAP (NLS). THE APPROXIMATE LOCATION OF THE SITE IS INDICATED.

3.2.4 SATELLITE IMAGERY

Recent satellite imagery from 2005 to the present shows continuity across the site regarding its modern developments. An image from 2005 (Figure 6) shows the site and associated features with the most clarity. The image from 2005 shows the modern Karma Hotel to the west-south-west of the proposed development site and a network of pathways about the proposed development area. The west-south-west boundary of the area is defined by a number of large plastic water tanks and other than the north side of the development area the site is ostensibly surrounded by heavily wooded slopes. The prominent cairn and vantage point on Tinkler's Hill is visible to the east-north-east of the site. A small structure/hut is visible in the wooded area to the east of the site, on the north side of Lower Town.

FIGURE 6: 2005 SATELLITE IMAGERY (© 2018 GETMAPPING PLC). THE APPROXIMATE LOCATION OF THE SITE IS INDICATED.

3.3 ARCHAEOLOGICAL BACKGROUND

A limited amount of intrusive archaeological investigation has been carried out in close proximity to the site, including immediately south-west of the site in the location of some water-tanks. These previous archaeological works near to the site were the monitoring of service trenches by Cornwall Archaeological Unit (CAU) (Ratcliffe and Thorpe 1991; Young 1993; Ratcliffe 1997). The excavation of a water-pipe trench running along the north side of Lower Town to water storage tanks on the west side of the proposed development area revealed a relative concentration of pottery (×8 sherds) and ×2 flakes of struck flint all of a probable Late Bronze Age date from immediately south of the proposed development site (Youngs 1993). In 1985, Late Neolithic/Early Bronze Age worked flint (*c.*61 fragments) was revealed from Higher Town to Lower Town during groundworks (Ratcliffe and Thorpe 1991). A telecommunications trench was excavated from Higher Town to Lower Town in 1992 (Ratcliffe 1997). At Lower Town, *c.*100m south-south-east of the site, this trench revealed; an early medieval Christian burial (11th-13th century); a palaeoenvironmentally rich medieval midden containing 10th-13th century pottery types; and ×11 possible Early Neolithic pieces of worked flint including an awl. Awls are reported to ostensibly have a prolonged significance on the Scilly's (Ratcliffe 1997). Also a number of environmental based surveys (Ratcliffe & Straker 1996; Camidge *et al* 2010; Marshall & Roberts 2013) and archaeological assessments providing historical and archaeological background have been written for the Isles of Scilly (Ratcliffe 1988; Ratcliffe & Straker 1996; Johns *et al* 2004; Johns 2012; a military defence survey ECO3819).

The Cornwall and Scilly Historic Environment Record (HER) records 114 assets within 1km of the site (see Figures 7 and 8; and Table 1), with 39 assets within 0.5km of the site. These illustrate the historical and archaeological development and context of the site.

3.3.1 PREHISTORIC 4000BC - AD43

There is a lot of evidence for prehistoric activity within 1km of the site. This is mostly made up of cairns within the Scheduled Ancient Monument on Tinker's hill, but also includes evidence of field-systems, settlement and findspots. There are possibly seven Bronze Age cairns on Tinkler's Hill (MCO31612; MCO31613; MCO31614; MCO31615; MCO31616; MCO31617; MCO31618), which constitute a cemetery (MCO31611). Apart from the speculative cairn nearest the proposed site (MCO31618), all of these cairns are in fair-good condition. Within 0.5km of the site are four findspots including flint tools and Bronze Age to Iron Age pottery, two of which are adjacent to the proposed site (MCO30810; MCO30817; MCO30860; MCO31463). A Bronze Age hut circle (MCO31098) is listed to the west of the site. Within 0.5km of the site also is a probable prehistoric field-system on Trean (MCO31854) and a prehistoric or Romano-British field system on the east side of Tinkler's Hill (MCO31619).

3.3.2 ROMANO-BRITISH AD43 – AD409

There are no Romano-British assets recorded on the HER within 0.5km of the site, but the nearest assets are a field-system to the east (MCO31025) and a cist cemetery to the south-east (MCO30859).

3.3.3 EARLY MEDIEVAL AD410 – AD1065

Early Medieval assets recorded on the HER near to the site include settlement evidence near/at Lower Town including a grave, midden and field-systems mostly revealed during earlier archaeological monitoring (MCO30814; MCO30815; MCO30816; MCO30838); and to the west of the site a possible field-system and a submerged structure (MCO41918; MCO41919).

3.3.4 MEDIEVAL AD1066 - AD1540

Medieval sites recorded on the HER near to the site include a granite cresset stone from Middle Town (MCO31536) and possibly the remains of a quay to the west of the site (MCO31097).

3.3.5 POST-MEDIEVAL AND MODERN AD1540 - PRESENT

Approximately 15 assets within 0.5km of the site listed on the HER are Post-medieval to Modern in date. These are predominantly field systems, although some may have Medieval origins (MCO30522; MCO41919); kelp pits (MCO30813; MCO31610); Three wells (MCO30232; MCO30811; MCO30835); the remains of two boat houses (MCO31100; MCO31101; MCO31597); findspots including mill stones (MCO30836; MCO31099); and a ruined quay (MCO31598).

3.3.6 UNDATED

Three undated features are recorded within the search area on the HER; a dubious occupation site (MCO30185), a dry stone wall (MCO30760) and a pit between Tinkler's Hill and Top Rock Hill identified on aerial photography (MCO41917).

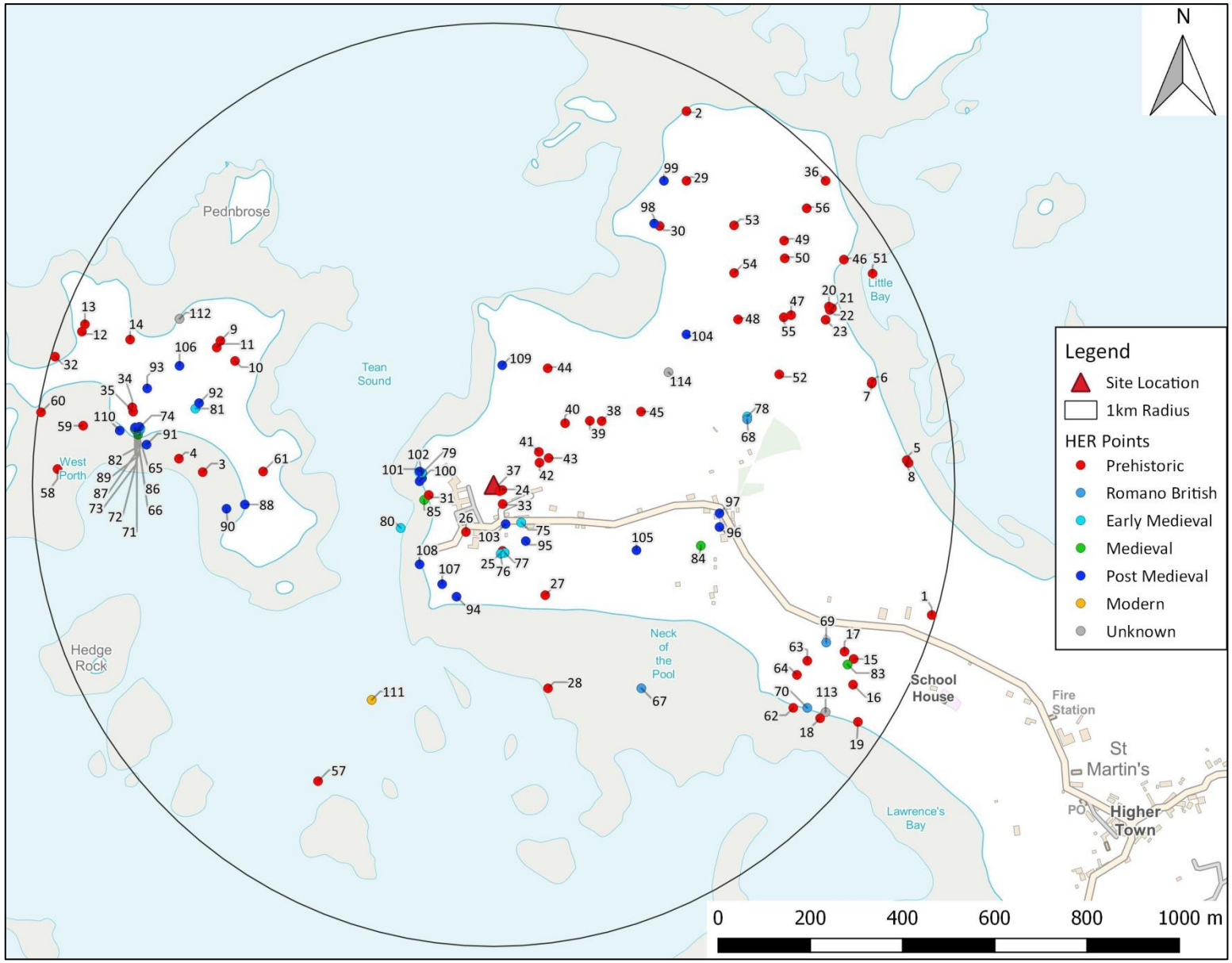

FIGURE 7: NEARBY HERITAGE ASSETS (SOURCE: CORNWALL HER).

TABLE 1: TABLE OF NEARBY HERITAGE ASSETS (CORNWALL HER).

No.	MonUID	Name	Summary	Period	Designated Asset
1	MCO30168	BARNACLE ROCK - Bronze Age entrance grave	A possible burial chamber is listed by Russell; there are no remains.	Prehistoric	-
2	MCO30223	BUTTER PORTH - Prehistoric occupation site	An old land surface exposed by sea erosion west of Butter Porth.	Prehistoric	-
3	MCO30508	EAST PORTH - Prehistoric field system	Remains of a boulder wall at high water mark averaging 2.0m wide and 0.3m high and 21.5m long.	Prehistoric	-
4	MCO30523	EAST PORTH - Prehistoric findspot	An old land surface exposed in the intertidal zone in 1993, together with 72 pieces of flint and potsherds.	Prehistoric	-
5	MCO30557	GREAT BAY - Bronze Age occupation site	A storm exposed a length of wall in the sandy cliff face at Great Bay.	Prehistoric	-
6	MCO30559	GREAT BAY - Prehistoric findspot	A hammerstone from an Iron Age hut at Great Bay.	Prehistoric	-
7	MCO30558	GREAT BAY - Prehistoric hut circle	A section of walling discovered in the dune face, possibly the remains of a hut.	Prehistoric	-
8	MCO30560	GREAT BAY - Prehistoric occupation site	Loose granite stones on an old land surface and Bronze Age and Iron Age remains recorded nearby, suggest the site of prehistoric occupation.	Prehistoric	-
9	MCO30584	GREAT HILL - Bronze Age entrance grave	An entrance grave, 6.5m diameter by 1.4m high.	Prehistoric	SAM
10	MCO30585	GREAT HILL - Bronze Age entrance grave	A ruined entrance grave, 7.5m diameter, formed by a kerb of massive slabs, mostly fallen.	Prehistoric	SAM
11	MCO30586	GREAT HILL - Prehistoric hut circle	The remains of an oval hut or possibly a cairn, 2.5m by 1.7m.	Prehistoric	-
12	MCO30726	KIPPER CARN - Prehistoric field system	Three single stone walls averaging 0.5m wide and 0.5m high, consisting of boulders with some orthostats and natural rocks.	Prehistoric	SAM
13	MCO30727	KIPPER CARN - Prehistoric hut circle	A hut circle, 4.5m across and 7.0m overall diameter.	Prehistoric	SAM
14	MCO30725	KIPPER CARN - Prehistoric hut circle	Remains of a hut circle, 6.0m by 4.0m with walling up to 1.0m high.	Prehistoric	SAM
15	MCO30756	KNACKYBOY CAIRN - Bronze Age entrance grave	Knackyboy Cairn entrance grave - excavations in 1912 and 1947 produced large quantities of BA pottery.	Prehistoric	SAM

16	MCO30759	KNACKYBOY CARN - Mesolithic findspot	A tiny borer-needle found in a pocket of worked flints in a rock cleft at Knackyboy.	Prehistoric	-
17	MCO30757	KNACKYBOY CARN - Prehistoric field system	A field system of low banks and lynchets is visible on the hill surrounding Knackyboy Cairn.	Prehistoric	-
18	MCO30762	LAWRENCES BAY - Prehistoric cist	Possible site of cists recorded by Crawford and Troutbeck; no remains.	Prehistoric	-
19	MCO30763	LAWRENCES BROW - Bronze Age cup marked stone, Bronze Age occupation site	An occupation site investigated by O'Neil in 1950. A site visit in 1988 revealed no surviving remains.	Prehistoric	-
20	MCO30784	LITTLE BAY - Bronze Age field system	Part of a field system associated with the hut settlement.	Prehistoric	SAM
21	MCO30783	LITTLE BAY - Bronze Age hut circle	The remains of an oval hut excavated by the O'Neils, a component of a larger complex of buildings.	Prehistoric	SAM
22	MCO30782	LITTLE BAY - Bronze Age hut circle	The remains of four huts and an associated field system.	Prehistoric	SAM
23	MCO30781	LITTLE BAY - Prehistoric findspot	An area of worked flints at Little Bay.	Prehistoric	-
24	MCO30817	LOWER TOWN - Bronze Age findspot, Iron Age findspot	A small assemblage of late Bronze Age / early Iron Age artefacts, found during trenching work in 1993.	Prehistoric	-
25	MCO30812	LOWER TOWN - Neolithic lithic scatter, Bronze Age lithic scatter	A concentration of flints recovered from fields at Lower Town during SWEB trenching.	Prehistoric	-
26	MCO30810	LOWER TOWN - Prehistoric findspot	A flint scraper found in the roots of an up-turned tree after a winter gale in 1979.	Prehistoric	-
27	MCO30860	NECK OF THE POOL - Prehistoric findspot	A flint scraper and a flake were found in the rab layer within the cliff face at Neck of the Pool.	Prehistoric	-
28	MCO30861	NECK OF THE POOL - Prehistoric findspot	A possible flint awl found on the surface of the beach in the intertidal zone at Neck of the Pool in 1991.	Prehistoric	-
29	MCO31077	PERNAGIE - Prehistoric findspot	Nine flints found at Pernagie.	Prehistoric	-
30	MCO31080	PERNAGIE CARN - Bronze Age entrance grave	Possible remains of an entrance grave or a rock shelter.	Prehistoric	SAM
31	MCO31098	POINT OF FIELDS - Bronze Age hut circle	Remains of three huts on the beach found in 1978.	Prehistoric	-

32	MCO31453	ST HELENS PORTH - Prehistoric findspot	A possible flint scraper was found on the surface of the beach in St Helen's Porth.	Prehistoric	-
33	MCO31463	ST MARTINS - Neolithic findspot, Bronze Age findspot	Worked flints, including tools and cores, collected from trenches dug by SWEB during 1985.	Prehistoric	-
34	MCO31541	TEAN - Prehistoric findspot	Unprovenanced worked flints from Tean, now at the Isles of Scilly museum.	Prehistoric	-
35	MCO31540	TEAN - Prehistoric hut circle settlement	The fragmentary remains of hut circles and field walls.	Prehistoric	SAM
36	MCO31557	THE COVE - Prehistoric findspot	A large, possibly flint, hammerstone found at The Cove.	Prehistoric	-
37	MCO31618	TINKLERS HILL - Bronze Age cairn	One of a group of seven cairns on Tinkler's Hill, site 'G' is recorded by Russell but was not found by the OS, who consider that there is no cairn here.	Prehistoric	-
38	MCO31615	TINKLERS HILL - Bronze Age cairn	One of a group of seven cairns on Tinkler's Hill, site 'D' is a scrub covered cairn, 10m diameter and 1.0m high.	Prehistoric	SAM
39	MCO31614	TINKLERS HILL - Bronze Age cairn	One of a group of seven cairns on Tinkler's Hill, site 'C' is a scrub covered cairn, 10m in diameter and 1.0m high, abutting a low bank.	Prehistoric	SAM
40	MCO31613	TINKLERS HILL - Bronze Age cairn	One of a group of seven cairns on Tinkler's Hill, site 'B' is a cairn, 8.5m in diameter and 0.5m high.	Prehistoric	SAM
41	MCO31616	TINKLERS HILL - Bronze Age cairn	One of a group of seven cairns on Tinkler's Hill, site 'E' is a scrub covered cairn, 14m in diameter and 0.8m high surrounded by a 'horse-shoe' of very large stones.	Prehistoric	SAM
42	MCO31617	TINKLERS HILL - Bronze Age cairn	One of a group of seven cairns on Tinkler's Hill, site 'F' is recorded on the OS map of 1908, but is now a hole in the ground.	Prehistoric	SAM
43	MCO31611	TINKLERS HILL - Bronze Age cairn cemetery	A group of seven cairns recorded as tumuli on the 1908 OS map.	Prehistoric	SAM

44	MCO31612	TINKLERS HILL - Bronze Age entrance grave	One of a group of seven cairns on Tinkler's Hill, site 'A' is an entrance grave which was excavated by O'Neil in 1950.	Prehistoric	SAM
45	MCO31619	TINKLERS HILL - Prehistoric field system, Romano British field system	Field walls on the east side of Tinkler's Hill form an irregular pattern suggesting an early origin.	Prehistoric	SAM
46	MCO31656	TOP ROCK - Prehistoric hut circle	Remains of a hut exposed in the cliff face, with pottery, flint flakes, bowl quern and saddle quern rubber.	Prehistoric	-
47	MCO31664	TOP ROCK HILL - Bronze Age cairn	A cairn, 6.0m in diameter and 0.8m high.	Prehistoric	SAM
48	MCO31663	TOP ROCK HILL - Bronze Age cairn	A feature recorded on the 1908 OS map is likely to be associated with the field system, rather than being a cairn.	Prehistoric	SAM
49	MCO31661	TOP ROCK HILL - Bronze Age cairn	A feature recorded on the 1908 OS map as a kistuaen.	Prehistoric	SAM
50	MCO31662	TOP ROCK HILL - Bronze Age entrance grave	A cairn, 6.0m diameter and 0.8m high, with a sub-rectangular chamber within the centre of the mound.	Prehistoric	SAM
51	MCO31659	TOP ROCK HILL - Iron Age bank (earthwork)	A substantial ditch and bank, roughly 10m wide and 2.5m high, runs from Little Bay to Porth Seal.	Prehistoric	-
52	MCO31658	TOP ROCK HILL - Prehistoric field system	The north part of a 32 hectare field system extending along the unenclosed coastal strip.	Prehistoric	SAM
53	MCO41915	TOP ROCK HILL - Prehistoric field system	Area of prehistoric field system surviving across the western half of a low headland extending from a summit knoll at the south of Pernagie.	Prehistoric	SAM
54	MCO31666	TOP ROCK HILL - Prehistoric findspot	A flint scraper and a putative flint blade or arrowhead, found by O'Neil.	Prehistoric	-
55	MCO31665	TOP ROCK HILL - Prehistoric hut circle	A hut 6.0m diameter enclosed by a bank of stones 3.0m across.	Prehistoric	SAM
56	MCO31667	TOP ROCK VALLEY - Prehistoric hut circle	A hut circle found by Tangye, part of an extensive field system and probable domestic buildings, buried by sand.	Prehistoric	SAM

57	MCO31772	WEST BROAD LEDGE - Bronze Age hut circle	A group of possible hut circles, visible as a complex of seaweed-covered circular features at 2.0m below lower spring tide.	Prehistoric	-
58	MCO31775	WEST PORTH - Bronze Age cairn	A cairn in West Porth, visible at half tide, 14.5m diameter and 1.3m high.	Prehistoric	SAM
59	MCO31774	WEST PORTH - Prehistoric field system	Walls averaging 0.6m wide and 0.5m high, forming part of a field system at West Porth.	Prehistoric	SAM
60	MCO31781	WEST PORTH - Prehistoric lithic scatter	Lithic scatter found in West Porth.	Prehistoric	-
61	MCO31854	YELLOW CARN - Prehistoric field system	The possible remains of a stone hedge; identified by the OS as a number of naturally placed blocks of stone.	Prehistoric	SAM
62	MCO31855	YELLOW ROCK - Bronze Age findspot	Gold bracelet, of Bean Down type, dating to c900-700BC.	Prehistoric	-
63	MCO31856	YELLOW ROCK CARN - Bronze Age findspot	A cremation urn was found by Lewis in a natural cleft in the rocks near Yellow Rock Carn.	Prehistoric	-
64	MCO31858	YELLOW ROCK CARN - Prehistoric findspot	A granite muller was found in fields below Yellow Rock Carn.	Prehistoric	-
65	MCO30511	EAST PORTH - Romano British midden	A midden composed of limpet and other shells, pottery, animal, fish and bird bones, stone objects, Roman coins and a bronze buckle.	Romano British	-
66	MCO30510	EAST PORTH - Romano British settlement, Early Medieval settlement	A multi-period settlement on the west side of East Porth.	Romano British	-
67	MCO30859	NECK OF POOL - Romano British cemetery	A cist cemetery recorded by Troutbeck.	Romano British	-
68	MCO31025	PARSONAGE FIELD - Romano British occupation site	A length of wall, 1.8m wide, with a well-built inner face of large horizontal stones.	Romano British	-
69	MCO31026	PARSONAGE FIELD - Romano British occupation site	The probable remains of a hut circle, excavated by O'Neil in 1952.	Romano British	-

70	MCO31857	YELLOW ROCK CARN - Romano British cist	A cist, 1.2m long by 0.3m deep, found by Lewis in 1946.	Romano British	-
71	MCO30513	EAST PORTH - Early Medieval cemetery	Cist graves of Christian aspect built soon after the C5/C6 occupation.	Early Medieval	-
72	MCO30515	EAST PORTH - Early Medieval chapel	Remains of a building, probably the chapel of St Theona, possibly re-used as a cowshed in the C17.	Early Medieval	-
73	MCO30514	EAST PORTH - Early Medieval chapel	The stone chapel at East Porth could post-date an earlier wooden structure on the same site.	Early Medieval	-
74	MCO30512	EAST PORTH - Early Medieval hut circle	A stone-walled and probably originally sub-rectangular hut built partly above an earlier midden.	Early Medieval	-
75	MCO30816	LOWER TOWN - Early Medieval grave	An early Christian grave uncovered by the south side of the road at Lower Town during trenching in 1992.	Early Medieval	-
76	MCO30815	LOWER TOWN - Early Medieval midden, Medieval midden	A rich early medieval midden and a small concentration of C10-C16 pottery, found during SWEB trenching in 1992.	Early Medieval	-
77	MCO30814	LOWER TOWN - Early Medieval settlement, Medieval settlement	The site of a C10-C16 settlement indicated by the discovery of a midden, a grave and pottery on the south side of Lower Town.	Early Medieval	-
78	MCO30838	MIDDLE TOWN HILL - Early Medieval field system	The find of an enamelled brooch dated to the mid C7-C8 led to the excavation of two field walls buried in dune sand.	Early Medieval	-
79	MCO41919	ST MARTINS - Early Medieval field boundary, Post Medieval field boundary	Stone field walls are visible on aerial photographs (p1) and were plotted as part of the NMP.	Early Medieval	-
80	MCO41918	ST MARTINS - Early Medieval structure	The remains of a small structure, approx 16m by 8.0m and partially submerged, are visible on aerial photos.	Early Medieval	-

81	MCO41914	TEAN - Early Medieval farm building, Early Medieval building	A small structure, approx 6.0m by 3.0m and roofless, is visible on air photos.	Early Medieval	SAM
82	MCO30516	EAST PORTH - Medieval occupation site	The settlement at East Porth was re-occupied briefly in the late C12 or C13.	Medieval	-
83	MCO30758	KNACKYBOY CAIRN - Medieval findspot	Pottery found around Knackyboy Cairn and has been identified as C12 cooking pots of Sandy Lane Style 2.	Medieval	-
84	MCO31536	MIDDLE TOWN - Medieval findspot	A granite cresset stone is built into a field wall SW of Middle Town.	Medieval	-
85	MCO31097	POINT OF FIELDS - Medieval quay, Post Medieval quay	The L-shaped lowest surviving course of a ruined quay recorded on the 1888 OS map.	Medieval	-
86	MCO44763	TEAN - Medieval socketed stone, Post Medieval socketed stone	A small flat slab with a deep socket on its upper surface, situated on a small headland between West and East Porth.	Medieval	-
87	MCO30519	EAST PORTH - Post Medieval farmhouse	A late C18 farmhouse and outbuildings, 8.2m long and 3.7m wide internally.	Post Medieval	-
88	MCO30522	EAST PORTH - Post Medieval field system	The remains of a field system exposed at HWM on the south east side of East Porth.	Post Medieval	SAM
89	MCO30518	EAST PORTH - Post Medieval house	A house said to have been built by the Nance family in the late C17, overlaying a Romano-British midden.	Post Medieval	-
90	MCO30521	EAST PORTH - Post Medieval mooring bollard	A large boulder with an iron mooring ring in the top of it.	Post Medieval	-
91	MCO30509	EAST PORTH - Post Medieval quay	Remains of a quay just below high water mark, averaging 2.0m wide and visible for a length of 22m.	Post Medieval	SAM
92	MCO30587	GREAT HILL - Post Medieval farm building	A ruined barn probably associated with the C18-C19 farmhouse on the west side of East Porth.	Post Medieval	SAM
93	MCO30588	GREAT HILL - Post Medieval pump house	A pump house recorded on the OS maps of 1890 and 1908.	Post Medieval	SAM

94	MCO30813	LOWER TOWN - Post Medieval kelp pit	A group of four kelp pits eroding out of the dune face south west of Lower Town.	Post Medieval	-
95	MCO30811	LOWER TOWN - Post Medieval well	A stone-lined well, visible on the surface as a square setting of granite slabs with granite lintels.	Post Medieval	-
96	MCO30836	MIDDLE TOWN - Post Medieval findspot	Three millstones are set into cement.	Post Medieval	-
97	MCO30835	MIDDLE TOWN - Post Medieval well	A hand-pump on top of the well in a garden at Middle Town.	Post Medieval	-
98	MCO31079	PERNAGIE - Post Medieval building	A ruined building set amongst the post-medieval field system at Pernagie.	Post Medieval	-
99	MCO31078	PERNAGIE - Post Medieval field system	A remnant post-medieval field system at Pernagie on the north west side of Top Rock Hill.	Post Medieval	-
100	MCO31100	POINT OF FIELDS - Post Medieval boat house	Remains of a boathouse 10m long and 3.0m wide.	Post Medieval	-
101	MCO31101	POINT OF FIELDS - Post Medieval boat house	The remains of a building which is probably a boathouse, recorded by Tangye in 1987.	Post Medieval	-
102	MCO31099	POINT OF FIELDS - Post Medieval findspot	Post-medieval pot sherds, bottle glass and clay pipe fragments, found in the cliff face.	Post Medieval	-
103	MCO57987	ST MARTINS - C19 farmhouse	A mid-C19 farmhouse incorporating older elements.	Post Medieval	II
104	MCO41916	ST MARTINS - Post Medieval trackway	A trackway is visible as a ditch on aerial photos.	Post Medieval	-
105	MCO30232	ST MARTINS - Post Medieval well	A granite well with two sets of 14 steps leading down to it.	Post Medieval	-
106	MCO31542	TEAN - Post Medieval field system	The remains of a post-medieval field system associated with the C19 farmstead on the west side of East Porth.	Post Medieval	SAM
107	MCO31597	THE PORTH - Post Medieval boat house	Old photographs show boathouses (gig sheds) at The Porth; there are now no remains.	Post Medieval	-

108	MCO31598	THE PORTH - Post Medieval quay	A ruined quay, revealed after sand shifted during the severe storms of January 1990.	Post Medieval	-
109	MCO31610	TINKLERS HILL - Post Medieval kelp pit	A post-medieval kelp-burning pit situated on the coastal margin at the foot of the western slope of Tinkler's Hill.	Post Medieval	SAM
110	MCO31780	WEST PORTH - Post Medieval kelp pit	A kelp pit lying on the low cliff edge, 1.4m in diameter by 0.6m deep.	Post Medieval	SAM
111	MCO41998	ST MARTINS - Modern structure	A series of three parallel linear features, visible on air photos, likely to be visible sections of modern power cable.	Modern	-
112	MCO30185	BLACK PORTH - Undated occupation site	A doubtful occupation site in the cliff face on the east side of Black Porth.	Unknown	-
113	MCO30760	KNACKYBOY CARN - Undated wall	A drystone wall, constructed of beach boulders, comprising three courses standing 1.0m high and 0.5m wide.	Unknown	-
114	MCO41917	ST MARTINS - Undated pit	A small pit, 4.0m diameter, visible on air photos.	Unknown	-

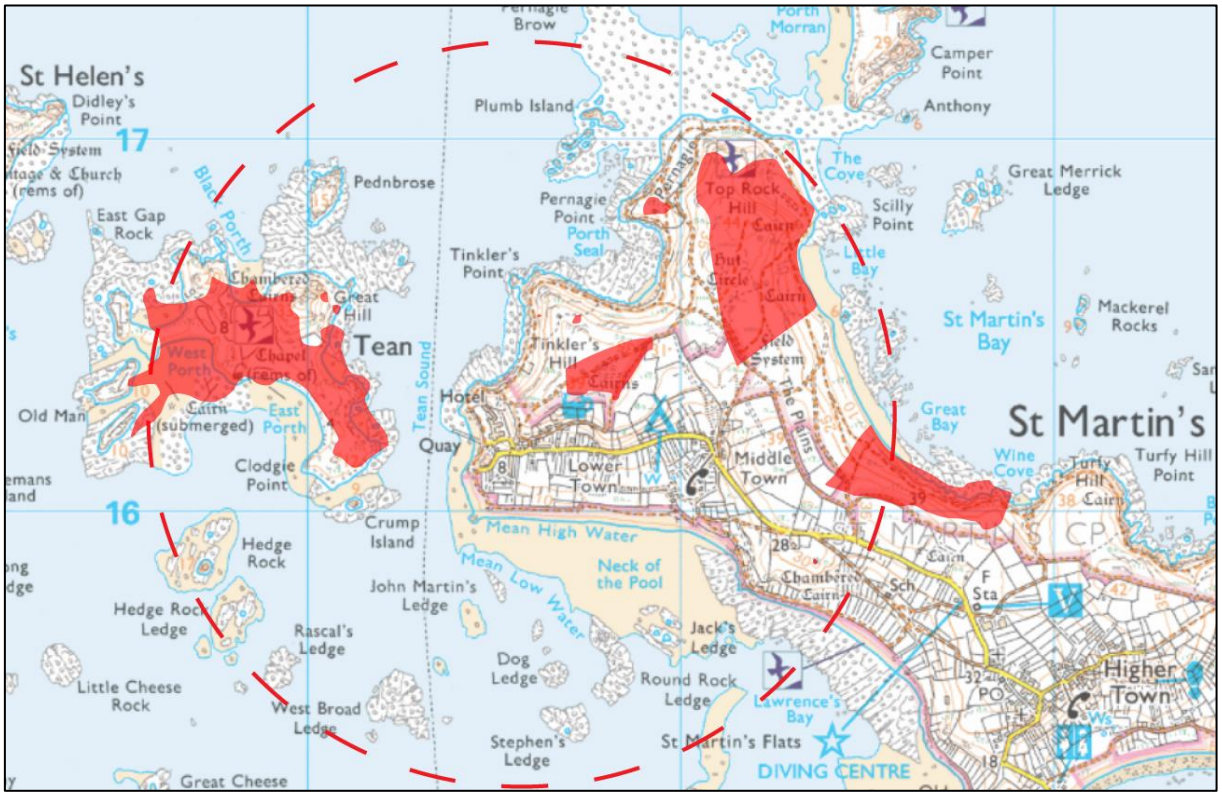

FIGURE 8: LOCATION OF SCHEDULED ANCIENT MONUMENT (SAM) AREAS WITHIN 1KM OF THE PROPOSED SITE (SOURCE: CORNWALL AND SCILLY HER).

3.4 ARCHAEOLOGICAL POTENTIAL AND IMPACT SUMMARY

3.4.1 SITE VISIT

The site lies within an area of rhododendron woodland on a south-south-west facing slope. This slope rises up moderately and gradually to the north and drops away suddenly to the south and south-west. A series of overgrown trackways/footpaths run along-side and between parts of the proposed site. The rhododendron growth is sporadic to the north of the site, which is otherwise covered in dense gorse up to the height of *c.*1.50m; as this slope levelled out to the north and north-east the gorse became shorter and the crest of Tinkler's Hill, a relative plateau, is covered in ankle-shin length gorse and rough shrubs. The proposed development areas are specifically located within an area of dense rhododendron woodland that covers the steeper parts of the slope from Tinkler's Hill down to the hotel, Lower Town and between. A mix of dense gorse and rhododendron woodland also extends to the east of the site.

The site is within open scrub and woodland and any boundaries are topological, floral or the man-made footpaths: the north boundary of the site is footpaths before dense gorse, the south a man-made water tank depository against a steep slope covered in rhododendron, and the west boundary dense gorse and rhododendron.

Despite the rhododendron, the proposed locations of the development (tents) were accessible as the flora allowed for the ground to be seen within the canopy of the foliage once one crept within the bushes. In each approximate location of the tents there were no visible earthworks.

East and north of the proposed developments, where the gorse coverage becomes thicker no obvious earthworks could be seen; some known cairns were visible under similar coverage as undulations in the landscape (further north on Tinkler's Hill), but it is possible that more poorly surviving features or low walls/banks associated with field systems would not have been visible given the gorse. These speculative areas are, however, outside the footprint of the proposed developments.

The water tanks on the west-south-west side of the proposed development are within an area of already disturbed/terraced ground; topsoil having been dug-away and banked up as a boundary on the north-side of the water tanks. These and notable water pipes and ostensible drains across the area around the site indicate that the site would already have access to amenities without much further disturbance/groundworks.

Views from the site are limited by screening from rhododendron to the south, south-west and south-east and limited by the topography of the slope to the north. Were the views southward not obscured by trees and bushes one could have views across the Scilly's to Trean, Tresco and St Mary's, however all at such a distance that discerning topographic features of archaeological importance would be impossible. Any intervisibility between the site and known archaeological features on Tinkler's Hill would only be afforded if a development was taller than the surrounding rhododendron (up to two stories) or if the surrounding flora was removed.

An existing wooded hut to the east of the proposed development and situated in a similar locale was almost invisible until one was upon it, and it had a deck area that over-looked the Scilly's to the south. It had no affect on nearby historical/archaeological assets. When near the beach on the south side of St Martin's, south of the Karma Hotel this hut was occasionally visible depending on light conditions as a subtle feature, which would not be visible at a much greater distance. It is possible that the proposed development will have a lesser landscape presence than this when in operation, as well as being seasonal.

The character of the landscape is generally very open, but the site is in a zone that is very enclosed by flora and restricted to the south by human development and steep slopes; allowing for a sense of serene isolation in an otherwise open landscape. The slope and height of the site both shield it from views to the north, but provide potentially pleasant views to the south while maintaining a sense of isolation. In the sites current state it has no inter-visibility with any assets or features in the wider landscape, but one is only a stone's throw from a path or vantage point that allows views to the south and south-west, or a very short walk to the Cairns on Tinkler's Hill.

3.4.2 SETTING OF THE SITE

The site lies on the south-west edge of Tinkler's Hill, *c.*100m south-west of the Scheduled Ancient Monument (SAM; List Entry No.1018109) of a prehistoric cairn cemetery and field system on the hill. It is on the edge of a point where the slope of Tinkler's Hill becomes steep making it ostensibly less practical for use and within one of the less open parts of the landscape; covered in dense rhododendron and gorse giving it a sense of isolation and a topographical point with little landmark presence. It has the modern Karma Hotel to its south-west and the Lower Town to its south-east with a post-medieval field-system associated with the main settlements of St Martin's and defined by dry-stone walls further to its east. It's enclosed nature by flora and relative topographic isolation; being neither part of the wide-open views further up Tinkler's Hill, nor within the lower lying settlements gives it a solitary nuance.

The general character of the location is one of a prehistoric open roughland, although prehistoric field-systems have been identified within the landscape. The most prominent features of this landscape being the principle aspects of the SAM, Tinkler's Hill; particularly a cairn and view point *c.*113m north-east of the site, which is in very good condition and two particular cairns further north-east, all of which are part of the Tinkler's Hill prehistoric cemetery and important to views from them outward and across Tinkler's Point and the hill itself. The site itself is outside this general sphere as it has no landscape presence or inter-visibility with notable features or assets. Nor does it sit visibly within wider landscape views of the prehistoric character; shielded by rhododendron and atop a low-lying part of the slope of Tinkler's Hill.

3.4.3 ARCHAEOLOGICAL POTENTIAL

No archaeological potential was noted on the walkover of the site, no cropmarks, obvious mounds or linear features. Although much of the wider area of the development was covered by dense gorse the specific areas associated with the development were under rhododendron trees/bushes and the ground surface was clearly visible within these plants. No finds were visible on the ground; although, the state of the site was not conducive to spotting finds in the topsoil.

The adjacent scheduled cairn cemetery and field system (MCO31611/DCO678) and prehistoric findspots (MCO30817; MCO31463) noted on the Cornwall HER in the immediate vicinity demonstrate this as an area of intense Bronze Age burial practice and considerable prehistoric activity. The adjacent scheduled monument fits with the topographical profile of barrow cemeteries with significant wide views over a large area, however the proposed site is on the periphery or perhaps outside this area and the reputed cairn located close to the site (MCO31618) was not identified during the walkover and if it exists it may have been miss-located: it does not survive on the development site or immediately adjacent to it. Any development so close to acknowledged Bronze Age burials and prehistoric findspots have the possibility of encountering other deposits. The potential for prehistoric finds or deposits is therefore theoretically high.

3.5 DISCUSSION

Based on the results of the desk-based assessment, the archaeological potential of the site would appear to be *Medium-High*. It is possible that features or more likely material culture relating to prehistoric activity in the area survive. Although modern water tanks and pipes have been inserted into the area around the site, the general lack of modern development across the island

means that truncation of archaeological features may be slight; however across the island soil depths, agricultural process, and bioturbation in the case of the proposed site may have caused some damage to any buried archaeological resource. Despite the theoretically high potential of the site to yield archaeological deposits, the absence of topographic or archaeological features visible during the walkover survey and lack of identified prehistoric features in earlier monitoring jobs nearby slightly reduces this potential. Overall therefore, the archaeological potential of the site is probably *medium/high* being located in an area of high potential. As such it is recommended that further archaeological works be carried out, if the proposed development plan requires any excavation of topsoil or deeper groundworks; most appropriately in the form of a watching brief to establish the level of survival of archaeological/historical features.

The direct *effect* of the development would be the disturbance or destruction of archaeological features or deposits present within the footprint of the development, although the planned development is relatively nonintrusive; the *impact* of the development would depend on the presence and significance of archaeological features and deposits.

TABLE 2: SUMMARY OF DIRECT IMPACTS.

Asset	Type	Distance	Value	Magnitude of Impact	Assessment	Overall Assessment
Direct Impacts						
Identified archaeological features	U/D	Onsite	Unknown	Major	Slight	Negative/Substantial
After mitigation			Negligible	Minor	Neutral/Slight	Negligible

4.0 INDIRECT IMPACTS

4.1 STRUCTURE OF THE ASSESSMENT

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

The methodology adopted in this document is based on that outlined in *The Setting of Heritage Assets* (GPA3 Historic England 2015), with reference to ICOMOS (2011) and DoT (DMRB, WEBTAG) guidance. The assessment of effect at this stage of a development is an essentially subjective one, but one based on the experience and professional judgement of the authors. Appendix 1 details the methodology employed.

This report follows the staged approach to proportionate decision making outlined in *The Setting of Heritage Assets* (Historic England 2015, 6). *Step one* is to identify the designated heritage assets that might be affected by the development. The first stage of that process is to determine an appropriate search radius, and this would vary according to the height, size and/or prominence of the proposed development. For instance, the search radius for a wind turbine, as determined by its height and dynamic character, would be much larger than for a single house plot or small agricultural building. The second stage in the process is to look at the heritage assets within the search radius and assign to one of three categories:

- Category #1 assets: Where proximity to the proposed development, the significance of the heritage asset concerned, or the likely magnitude of impact, demands detailed consideration.
- Category #2 assets: Assets where location 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 still listed in the impact summary table.

For *Step two* and *Step three*, and with an emphasis on practicality and proportionality (*Setting of Heritage Assets* p15 and p18), this assessment then groups and initially discusses heritage assets by category (e.g. churches, historic settlements, funerary remains etc.) to avoid repetitious narrative; each site is then discussed individually, and the particulars of each site teased out. The initial discussion establishes the baseline sensitivity of a given category of monument or building to the potential effect, the individual entry elaborates on local circumstance and site-specific factors. The individual assessments should be read in conjunction with the overall discussion, as the impact assessment is a reflection of both.

4.2 QUANTIFICATION

The size and location of the proposed development relative to the size of the site would suggest a search radius of 0.5km is sufficient to identify those designated heritage assets where an appreciable effect might be experienced. There are a number of designated heritage assets within 500m of the site: including a Grade II Listed farmhouse at Lower Town, a Bronze Age cairn cemetery and prehistoric field system on Tinklers Hill, part of the adjacent island of Tean with prehistoric to post-medieval activity and a post-medieval kelp pit on the west coast of Tinklers

Hill. There are no Registered Parks and Gardens or Battlefields or World Heritage Sites within 1km of the site.

An undesignated asset of a potential/reputed cairn near to the proposed development site is also considered in this assessment; although it's apparent absence during the walkover survey has relegated this to a Category #3 consideration. It ostensibly has a zero landscape presence or possibly does not exist/has been wrongly located. This, with other nearby HER assets such as prehistoric findspots have been considered in the earlier archaeological potential of the site.

With an emphasis on practicality and proportionality (see *Setting of Heritage Assets* p15 and p18), only those assets where there is the possibility for a effect greater than negligible (see Table 2 in Appendix 1) are considered here in detail – the rest have been scoped out of this assessment.

- Category #1 assets: Prehistoric cairn cemetery and field system on Tinkler's Hill, St Martin's
- Category #3 assets: all other assets

4.3 IMPACT BY CLASS OF MONUMENT OR STRUCTURE

4.3.1 PREHISTORIC RITUAL/FUNERARY MONUMENTS

These monuments undoubtedly played an important role in the social and religious life of past societies, and it is clear they were constructed in locations invested with considerable religious/ritual significance. In most instances, these locations were also visually prominent, or else referred to prominent visual actors, e.g. hilltops, tors, sea stacks, rivers, or other visually prominent monuments. The importance of intervisibility between barrows, for instance, is a noted phenomenon. As such, these classes of monument are unusually sensitive to intrusive and/or disruptive modern elements within the landscape. This is based on the presumption these monuments were built in a largely open landscape with clear lines of sight; in many cases these monuments are now to be found within enclosed farmland, and in varying condition. Sensitivity to turbine is lessened where tall hedgebanks restrict line-of-sight.

What is important and why

Prehistoric ritual sites preserve information on the spiritual beliefs of early peoples, and archaeological data relating to construction and use (evidential). The better examples may bear names and have folkloric aspects (historical/illustrative) and others have been discussed and illustrated in historical and antiquarian works since the medieval period (historical/associational). It is clear they would have possessed design value, although our ability to discern that value is limited; they often survive within landscape palimpsests and subject to the 'patina of age', so that fortuitous development is more appropriate. They almost certainly once possessed considerable communal value, but in the modern age their symbolic and spiritual significance is imagined or attributed rather than authentic. Nonetheless, the location of these sites in the historic landscape has a strong bearing on the overall contribution of setting to significance: those sites located in 'wild' or 'untouched' places – even if those qualities are relatively recent – have a stronger spiritual resonance and illustrative value than those located within enclosed farmland or forestry plantations.

Asset Name: **Prehistoric Cairn Cemetery and field system on Tinkler's Hill, St Martin's**	
Parish: St Martin's	*Value:* High
Designation: Scheduled Monument	*Distance to Development: c.*110m
Description Summary: Listing Text: *The small cemetery of platform cairns on Tinkler's Hill survives well, the attentions of antiquarian diggers and the 1950 excavation affecting two cairns but causing only limited disturbance to their form and fabric. The cemetery shows clearly the bias towards elevated land in the*	

siting of such prehistoric funerary monuments and it also demonstrates a typically non-random distribution of cairns across upland terrain: much the largest cairn is prominently sited close to a striking natural feature but relatively remote from known prehistoric settlement activity; by contrast the four smaller southern cairns, all but one in less prominent settings, are near the upper limits of prehistoric field systems occupying the favoured southerly aspects of the hill. This relationship between prehistoric funerary and settlement activity, and the form of field system deployed along the upper margins of the prehistoric settlement, is evident from the prehistoric field system surviving across the south of the plateau, its intermittent exposures confirming its extent across areas now largely masked by subsequent soil build up.

The monument includes a prehistoric cairn cemetery and field system on the plateau and upper southern slope of Tinkler's Hill in the west of St Martin's in the Isles of Scilly. On one of the cemetery's cairns are remains of a much later, post-medieval, maritime lookout. This scheduling is divided into two separate areas. The prehistoric cemetery contains at least five funerary cairns; the largest is located on the north western crest of the Hill's plateau, 35m south east of Tinkler's Rock, with the other four spaced 20m-85m apart across the south of the plateau. All are platform cairns whose rubble mounds rise to a flattened upper platform. The largest cairn, on the north west, has an ovoid mound, 22m north east-south west by 18.5m north west-south east, and up to 1.3m high; its platform is 11m in diameter with a slightly raised rim in which a spread of rubble and large slabs is occasionally visible. Limited excavation in 1950 revealed that the rim overlies remains of a stone-built kerb; a central hollow, 5.5m across and 0.3m deep, also derives from this episode of excavation. The cemetery's four southern cairns range from 10m to 15m in diameter and 0.5m to 1m high, with platforms 4m to 9m in diameter. The western of these cairns supports the prominent slab-built ring of a post medieval lookout, described below, but within that is a relatively recent central pit, 1.5m north east-south west by 1m north west-south east and 0.6m deep, with a large slab lying flat alongside, considered to derive from an antiquarian excavation which may have slighted a funerary structure. The prehistoric field system extends across the south and south east of the Tinkler's Hill plateau and adjacent upper southern slope. It is defined by slight turf-covered banks, 1m-2m wide and about 0.1m high, often only intermittently visible on the surface and clearest where crossed by modern paths and tracks which expose their rubble content as a distinct band about 1m wide. These exposures indicate a rectilinear layout whose boundaries are at approximate right angles to each other, roughly NNW-SSE and ENE-WSW on the south east of the plateau, and roughly NNE-SSW and ESE-WNW further west on the south of the plateau. The boundaries are considered to be the surviving upper sector of a formerly wider area of prehistoric land division serving settlement foci on the lower land south of Tinkler's Hill, where its survival is now truncated by successive later and modern enclosure around the present village of Lower Town. The field system extends onto the plateau beyond the cemetery's four southern cairns, three of which have banks running to them. Considerably later, the western of the four southern cairns was re-used to site a post-medieval maritime lookout, one of several such observation points on Scilly from which shipping movements were observed to allow pilots to be sent off promptly and also used in some cases by the Coastguard to monitor local activity. This lookout was provided with a shelter walled by large edge-set slabs, to 2m long and 1m high, forming an almost continuous oval ring with a second course of smaller slabs laid in some places. The wall measures 6m north west-south east by 5m north east-south west internally with a large gap to the south west. The shelter is built north west of centre on the cairn's platform, its outer face roughly 1.5m-2m behind the platform's southern edge. Beyond this scheduling, a further cairn cemetery associated with prehistoric field systems and settlement sites extends across Top Rock Hill and its flanks, the neighbouring upland area to the north east on St Martin's. The modern water-pipe trench, its fill, pipe and cables, and the modern borehole are excluded from the scheduling, although the ground beneath them is included.

Supplemental Comments: The more northerly cairns survive as gorse/scrub covered mounds that are visible against the horizon to various degrees depending on one's vantage point. The cairn nearest the site that had been re-used as a look-out was more definable, with a stone ring and from it the top of the rhododendron woodland surrounding the site and on the steeper south-westerly slopes were visible. A two storey structure on the site would have an impact, but the development is of single story and temporary/seasonal tents/units.

Conservation Value: Evidential value is potentially high as, despite some antiquarian activity, there may be additional burials or deposits associated with the cemetery and it is associated with a non-historical period for which archaeological data is vital. There will be a buried historic ground surface beneath cairns in this landscape, which may also contain environmental evidence. There is some very slight illustrative historical value to aspects of the cemetery, in that the reuse of cairns for look-outs reflects a changing practice or need that utilises the landscape. The communal value of the asset is attested by the popularity of these

past landscapes, both remote and funerary/ritualistic within modern tourism. They capture the imagination, especially when in a setting such as the Scilly's. Furthermore, the Scilly Isles, as a remote and isolated community, have a strong sense of self regardless of antecedents being related; and the land and its features, although long predating modern inhabitants and visitors are part of the community.
Authenticity and Integrity: The cemetery is within an open landscape that appears in good condition and presumably was part of the intended prehistoric funerary landscape. Its integrity can be presumed to be in very good condition given the lack of modern development and presumed survival of most of the asset. The change of a cairn to a look-out arguably enhances the authenticity as it preserved and helped to define a feature within the historical narrative of the landscape rather than destroying it.
Setting: In an open landscape and arranged so as not to block the most open sea-ward views to the north-west and the look-out converted example allowing views across the whole of the Scilly Isles and prominently to Tean and the south-west. The line of more northerly cairns has some landscape presence across the plateau of Tinkler's Hill and can be seen as relatively subtle mounds along the crest of the plateau. The site is open to the vistas and the elements and was/is not appropriate for settlement due to the exposure, although it has a great impact on one's experience of the landscape.
Contribution of Setting to Significance of Asset: Setting is paramount to the significance of a cairn, particularly perhaps in a cemetery setting where the interactions between the living and the dead and the landscape are at play almost regardless of belief systems (except nihilism). The lack of shared ritual culture with our ancestors does not detract from our own appreciation of a setting and/or its use.
Magnitude of Effect: A series of tents/units will be erected on platforms within an overgrown, wooded area that will be kept as such (relatively) shielding the development. It is situated on a slope that falls away from the views from the top of Tinkler's Hill and is not part of the prehistoric landscape viewed along the relative crest of the hill. Therefore it would have no change on the setting of the asset.
Magnitude of Impact: High value asset + no change = neutral
Overall Impact Assessment: **Neutral**

4.3.2 HISTORIC LANDSCAPE

General Landscape Character

The landscape of the British Isles is highly variable, both in terms of topography and historical biology. Natural England has divided the British Isles into numerous 'character areas' based on topography, biodiversity, geo-biodiversity and cultural and economic activity. The County Councils and AONBs have undertaken similar exercises, as well as Historic Landscape Characterisation.

Some character areas are better able to withstand the visual impact of development than others. Rolling countryside with wooded valleys and restricted views can withstand a larger number of sites than an open and largely flat landscape overlooked by higher ground. The English landscape is already populated by a large and diverse number of intrusive modern elements, e.g. electricity pylons, factories, modern housing estates, quarries, and turbines, but the question of cumulative impact must be considered. The aesthetics of all individual developments can be open to question, and site specific, but as intrusive new visual elements within the landscape, they will typically have some level of negative impact.

The proposed site would be constructed towards the south-west end of Tinkler's Hill to the south-west of the Scheduled Ancient Monument cairn cemetery on the hill. Although the setting of such a monument is paramount to it, the site lies outside this setting and would have no direct impact on it. On that basis the impact is assessed as **Neutral**.

4.3.3 AGGREGATE IMPACT

The aggregate impact of a proposed development is an assessment of the overall effect of a single development on multiple heritage assets. This differs from cumulative impact (below), which is an assessment of multiple developments on a single heritage asset. Aggregate impact is particularly

difficult to quantify, as the threshold of acceptability will vary according to the type, quality, number and location of heritage assets, and the individual impact assessments themselves.

Based on the restricted number of assets where any appreciable effect is likely, but keeping in mind the potential for a reputed cairn near to the site (MCO31618), the aggregate impact of this development is **Neutral** to **Negligible**.

4.3.4 CUMULATIVE IMPACT

Cumulative impacts affecting the setting of a heritage asset can derive from the combination of different environmental impacts (such as visual intrusion, noise, dust and vibration) arising from a single development or from the overall effect of a series of discrete developments. In the latter case, the cumulative visual impact may be the result of different developments within a single view, the effect of developments seen when looking in different directions from a single viewpoint, of the sequential viewing of several developments when moving through the setting of one or more heritage assets.
The Setting of Heritage Assets 2011a, 25

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

An assessment of cumulative impact is, however, very difficult to gauge, as it must take into account existing, consented and proposed developments. The threshold of acceptability has not, however, been established, and landscape capacity would inevitability vary according to landscape character.

The developments at the Karma Hotel would be seasonal and extremely low impact on the landscape with a limit to zero impact on views of this part of the island and none associated with the important landscape setting north-north-east of the site. A potential increased footfall of visitors and associated affects being the only perceivable impact on the immediate area. The lack of intrusion to the key assets and setting of the island thus far by development and for the above reasons an assessment of **no change** to **negligible** is appropriate.

TABLE 3: SUMMARY OF INDIRECT IMPACTS.

Asset	Type	Distance	Value	Magnitude of Impact	Assessment	Overall Assessment
Prehistoric cairn cemetery and field system on Tinkler's Hill, ST Martins	SAM	*c.*110m	High	No change-negligible	Neutral	Neutral
Prehistoric cairns, prehistoric to post-medieval settlements and field systems, an early Christian focus, post-medieval kelp pits and quay on Tean and Old Man	SAM	*c.*423m	High	No change	Neutral	Neutral
Post-medieval kelp pit on the western coast of Tinkler's Hill, St Martin's	SAM	<300m	High	No change	Neutral	Neutral
Bronze Age Cairn, Tinkler's Hill	UD	<100m	Low	unknown	Presumed Neutral	Neutral
Ashvale Farmhouse	GII	*c.*113m	Medium	No change	Neutral	Neutral
Indirect Impacts						
Historic Landscape	n/a	n/a	High	Negligible	Neutral	Negligible
Aggregate Impact	n/a	n/a	n/a	Negligible	Neutral	Negligible
Cumulative Impact	n/a	n/a	n/a	Negligible	Negligible	Negligible

5.0 CONCLUSION

The historic background to the site and the Historic Environment Record indicate the potential for prehistoric activity on the proposed site. The site may be relatively well preserved, although modern services and groundworks have occurred in the vicinity and the site probably lies outside the Bronze Age cairn cemetery on Tinkler's Hill.

The presence of prehistoric finds including flints and pottery near to the site illustrate the potential for topsoil (or deeper) finds to be recovered from the site during any groundworks that break the surface. Such stray finds may allude to other archaeological features or deposits in the area. The archaeological potential of the site is assessed as ***High***.

In terms of indirect impacts, the site is located in such a way to completely shield it from the nearby designated heritage assets and if floral coverage were to change then assets in the wider area would be located at such a distance to minimise the impact of the proposed development

The key designated assets are all located within 450m of the site. The most significant of which, Tinkler's Hill, is within *c.*110m. None of these Scheduled and undesignated assets would have direct intervisibility with the proposed site, due to screening from woodland and topographic restrictions. The proposals can therefore not impact upon their settings or significance in any meaningful way. A speculatively assigned cairn near to the site and listed as part of the Tinkler's Hill cemetery was not identified during the walkover survey and either does not exist or was located within overgrown scrub outside the proposed development area, as well as possibly lacking any landmark presence. The effect of the planned development on these assets would be **neutral** to **negligible**.

Any proposed building on the site would need to be low enough not to compete with the existing tree line of the surrounding rhododendron wooded areas so as not to encroach on views from the cairn/look-out to the north-east, on Tinkler's Hill.

With this in mind, the overall impact of the proposed development on the historic landscape can be assessed as **negligible**. The impact of the development on the buried archaeological resource would be **permanent** and **irreversible***,* should groundworks occur. However, no significant works are planned as part of the proposed development. If groundworks do occur, these could be mitigated through an archaeological monitoring and recording (watching brief) condition.

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APPENDIX 1: IMPACT ASSESSMENT METHODOLOGY

Heritage Impact Assessment - Overview
The purpose of heritage impact assessment is twofold: Firstly, to understand – insofar as is reasonable 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 its setting (indirect impact). This methodology employed in this assessment is based on the staged approach advocated in *The Setting of Heritage Assets* (GPA3 Historic England 2015), used in conjunction with the ICOMOS (2011) and DoT (DMRB vol.11; WEBTAG) guidance. This Appendix contains details of the 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 2018). The relevant guidance is reproduced below:

Paragraph 189
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 190
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.

Cultural Value – 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.

Listed Buildings
A Listed building is an occupied dwelling or standing structure which is of special architectural or historical interest. These structures are found on the *Statutory List of Buildings of Special Architectural or Historic Interest.* The status of Listed buildings is applied to 300,000-400,000 buildings across the United Kingdom. Recognition of the need to protect historic buildings began after the Second World War, where significant numbers of buildings had been damaged in the county towns and capitals of the United Kingdom. Buildings that were considered to be of 'architectural merit' were included. The Inspectorate of Ancient Monuments supervised the collation of the list, drawn up by members of two societies: The Royal Institute of British Architects and the Society for the Protection of Ancient Buildings. Initially the lists were only used to assess which buildings should receive government grants to be repaired and conserved if damaged by bombing. The *Town and Country Planning Act 1947* formalised the process within England and Wales, Scotland and Ireland following different procedures. Under the 1979 *Ancient Monuments and Archaeological Areas Act* a structure cannot be considered a Scheduled Monument if it is occupied as a dwelling, making a clear distinction in the treatment of the two forms of heritage asset. Any alterations or works intended to a Listed Building must first acquire Listed Building Consent, as well as planning permission. Further phases of 'listing' were rolled out in the 1960s, 1980s and 2000s; English Heritage advise on the listing process and administer the procedure, in England, as with the Scheduled Monuments.

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

Buildings are split into various levels of significance: Grade I (2.5% of the total) representing buildings of exceptional (international) interest; Grade II* (5.5% of the total) representing buildings of particular (national) importance; Grade II (92%) buildings are of merit and are by far the most widespread. Inevitably, accuracy of the Listing for individual structures varies, particularly for Grade II structures; for instance, it is not always clear why some 19th 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. There are 19,000-20,000 Scheduled Monuments in England.

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** and there are currently 1,600 sites on the list, 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.

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 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);

Hierarchy of Value/Importance	
	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.

Concepts – Conservation Principles
In making an assessment, this document adopts the conservation values (*evidential*, *historical*, *aesthetic* and *communal*) laid out in *Conservation Principles* (English Heritage 2008), and the concepts of *authenticity* and *integrity* as laid out in the guidance on assessing World Heritage Sites (ICOMOS 2011). This is in order to determine the relative importance of *setting* to the significance of a given heritage asset.

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. This is the least equivocal value: evidential value is absolute; all other ascribed values (see below) are subjective.

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

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

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

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

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

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

Design value relates primarily to the aesthetic qualities generated by the conscious design of a building, structure 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 have their most pronounced impact: the indirect effects of most developments are predominantly visual or aural, and can extent 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.

Authenticity
Authenticity, as defined by UNESCO (2015, no.80), 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, as defined by UNESCO (2015, no.88), 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.

Summary
As indicated, individual developments have a minimal or tangential effect on most of the heritage values outlined above, largely because almost all effects are indirect. The principle values in contention are aesthetic/designed and, to a lesser degree aesthetic/fortuitous. There are also clear implications for other value elements (particularly historical and associational, communal and spiritual), where views or sensory experience is important. As ever, however, the key element here is not the intrinsic value of the heritage asset, nor the impact on setting, but the relative contribution of setting to the value of the asset.

Setting – The Setting of Heritage Assets
The principle guidance on this topic is contained within two publications: *The Setting of Heritage Assets* (Historic England 2015) and *Seeing History in the View* (English Heritage 2011). While interlinked and complementary, it is useful to consider heritage assets in terms of their *setting* i.e. their immediate landscape context and the environment within which they are seen and experienced, and their *views* i.e. designed or fortuitous vistas experienced by the visitor when at the heritage asset itself, or those that include the heritage asset. This corresponds to the experience of its wider landscape setting.

Where the impact of a proposed development is largely indirect, *setting* is the primary consideration of any HIA. It is a somewhat nebulous and subjective assessment of what does, should, could or did constitute the lived experience of a monument or structure. The following extracts are from the Historic England publication *The Setting of Heritage Assets* (2015, 2 & 4):

The NPPF makes it clear that the setting of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve.

Setting is not a heritage asset, nor a heritage designation. Its importance lies in what it contributes to the significance of the heritage asset. This depends on a wide range of physical elements within, as well as perceptual and associational attributes, pertaining to the heritage asset's surroundings.

While setting can be mapped in the context of an individual application or proposal, it does not have a fixed boundary and 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 because what comprises a heritage asset's setting may change as the asset and its surroundings evolve or as the asset becomes better understood or due to the varying impacts of different proposals.

The HIA below sets out to determine the magnitude of the effect and the sensitivity of the heritage asset to that effect. The fundamental issue is that proximity and visual and/or aural relationships may affect the experience of a heritage asset, but if setting is tangential to the significance of that monument or structure, then the impact assessment will reflect this. This is explored in more detail below.

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 determine the 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.

Views

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*, see below). The following extract is from the English Heritage publication *Seeing History in the View* (2011, 3):

Views play an important part in shaping our appreciation and understanding of England's historic environment, whether in towns or cities or in the countryside. Some of those views were deliberately designed to be seen as a unity. Much more commonly, a significant view is a historical composite, the cumulative result of a long process of development.

The Setting of Heritage Assets (2015, 3) lists a number of instances where views contribute to the particular significance of a heritage asset:

- Views where relationships between the asset and other historic assets or places or natural features are particularly relevant;
- Views with historical associations, including viewing points and the topography of battlefields;
- Views where the composition within the view was a fundamental aspect of the design or function of the heritage asset;
- Views between heritage assets and natural or topographic features, or phenomena such as solar and lunar events;
- Views between heritage assets which were intended to be seen from one another for aesthetic, functional, ceremonial or religious reasons, such as military or defensive sites, telegraphs or beacons, Prehistoric funerary and ceremonial sites.

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. 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. It should be noted, however, that there are distance thresholds beyond which perception and recognition fail, and this is directly related to the scale, height, massing and nature of the heritage asset in question. For instance, beyond 2km the Grade II cottage comprises a single indistinct component within the wider historic landscape, whereas at 5km or even 10km a large stately home or castle may still be recognisable. By extension, where assets cannot be seen or recognised i.e. entirely concealed within woodland, or too distant to be distinguished, then visual harm to setting is moot. To reflect this emphasis on recognition, the term *landmark asset* is employed to denote those sites where the structure (e.g. church tower), remains (e.g. earthwork ramparts) or – in some instances – the physical character of the immediate landscape (e.g. a distinctive landform like a tall domed hill) make them visible on a landscape scale. In some cases, these landmark assets may exert landscape *primacy*, where they are the tallest or most obvious man-made structure within line-of-sight. However, this is not always the case, typically where there are numerous similar monuments (multiple engine houses in mining areas, for instance) or where modern developments have overtaken the heritage asset in height and/or massing.

Yet visibility alone is not a clear guide to visual impact. People perceive size, shape and distance using many cues, so context is critically important. For instance, research on electricity pylons (Hull & Bishop 1988) has indicated scenic impact is influenced by landscape complexity: the visual impact of pylons is less pronounced within complex scenes, especially at longer distances, presumably because they are less of a focal point and the attention of the observer is diverted. There are many qualifiers that serve to increase or decrease the visual impact of a proposed development (see Table 8), 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. The schema used to guide assessments is shown in Table 8 (below).

Type and Scale of Impact

The effect of a proposed development on a heritage asset can be direct (i.e. the designated structure itself is being modified or demolished, the archaeological monument will be built over), or indirect (e.g. a housing estate built in the fields next to a Listed farmhouse, and wind turbine erected near a hillfort etc.); in the latter instance the principal effect is on the setting of the heritage asset. A distinction can be made between construction and operational phase effects. Individual developments can affect multiple heritage assets (aggregate impact), and contribute to overall change within the historic environment (cumulative impact).

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 provision of screening. Large development would have an effect on historic landscape character, as they transform areas from one character type (e.g. agricultural farmland) into another (e.g. suburban).

Cumulative Impact: a single development will have a physical and a visual impact, but a second and a third site in the same area will have a synergistic and cumulative impact above and beyond that of a single site. The cumulative impact of a proposed development is particularly difficult to estimate, given the assessment must take into consideration operational, consented and proposals in planning.

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.

Scale of Impact

The effect of development and associated infrastructure on the historic environment can include positive as well as negative outcomes. However, all development changes the character of a local environment, and alters the character of a building, or the setting within which it is experienced. change is invariably viewed as negative, particularly within respect to larger developments; thus while there can be beneficial outcomes (e.g. positive/moderate), there is a presumption here that, as large and inescapably modern intrusive visual actors in the historic landscape, the impact

of a development will almost always be **neutral** (i.e. no impact) or **negative** i.e. it will have a **detrimental impact** on the setting of ancient monuments and protected historic buildings.

This assessment incorporates the systematic approach outlined in the ICOMOS and DoT guidance (see Tables 5-7), used to complement and support the more narrative but subjective approach advocated by Historic England (see Table 8). This provides 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 negative/substantial is almost never achieved). This is in adherence with GPA3 (2015, 7).

TABLE 5: MAGNITUDE OF IMPACT (BASED ON DMRB VOL.11 TABLES 5.3, 6.3 AND 7.3).

Factors in the Assessment of Magnitude of Impact – Buildings and Archaeology	
Major	Change to key historic building elements, such that the resource is totally altered; Change to most or all key archaeological materials, so that the resource is totally altered; Comprehensive changes to the setting.
Moderate	Change to many key historic building elements, the resource is significantly modified; Changes to many key archaeological materials, so that the resource is clearly modified; Changes to the setting of an historic building or asset, such that it is significantly modified.
Minor	Change to key historic building elements, such that the asset is slightly different; Changes to key archaeological materials, such that the asset is slightly altered; Change to setting of an historic building, such that it is noticeably changed.
Negligible	Slight changes to elements of a heritage asset or setting that hardly affects it.
No Change	No change to fabric or setting.
Factors in the Assessment of Magnitude of Impact – Historic Landscapes	
Major	Change to most or all key historic landscape elements, parcels or components; extreme visual effects; gross change of noise or change to sound quality; fundamental changes to use or access; resulting in total change to historic landscape character unit.
Moderate	Changes to many key historic landscape elements or components, visual change to many key aspects of the historic landscape, noticeable differences in noise quality, considerable changes to use or access; resulting in moderate changes to historic landscape character.
Minor	Changes to few key historic landscape elements, or components, slight visual changes to few key aspects of historic landscape, limited changes to noise levels or sound quality; slight changes to use or access: resulting in minor changes to historic landscape character.
Negligible	Very minor changes to key historic landscape elements, parcels or components, virtually unchanged visual effects, very slight changes in noise levels or sound quality; very slight changes to use or access; resulting in a very small change to historic landscape character.
No Change	No change to elements, parcels or components; no visual or audible changes; no changes arising from in amenity or community factors.

TABLE 6: SIGNIFICANCE OF EFFECTS MATRIX (BASED ON DRMB VOL.11 TABLES 5.4, 6.4 AND 7.4; ICOMOS 2011, 9-10).

Value of Assets	Magnitude of Impact (positive or negative)				
	No Change	Negligible	Minor	Moderate	Major
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: SCALE OF IMPACT.

Scale of Impact	
Neutral	No impact on the heritage asset.
Negligible	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.
Negative/minor	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.
Negative/moderate	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.
Negative/substantial	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.

TABLE 8: IMPORTANCE OF SETTING TO INTRINSIC SIGNIFICANCE.

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

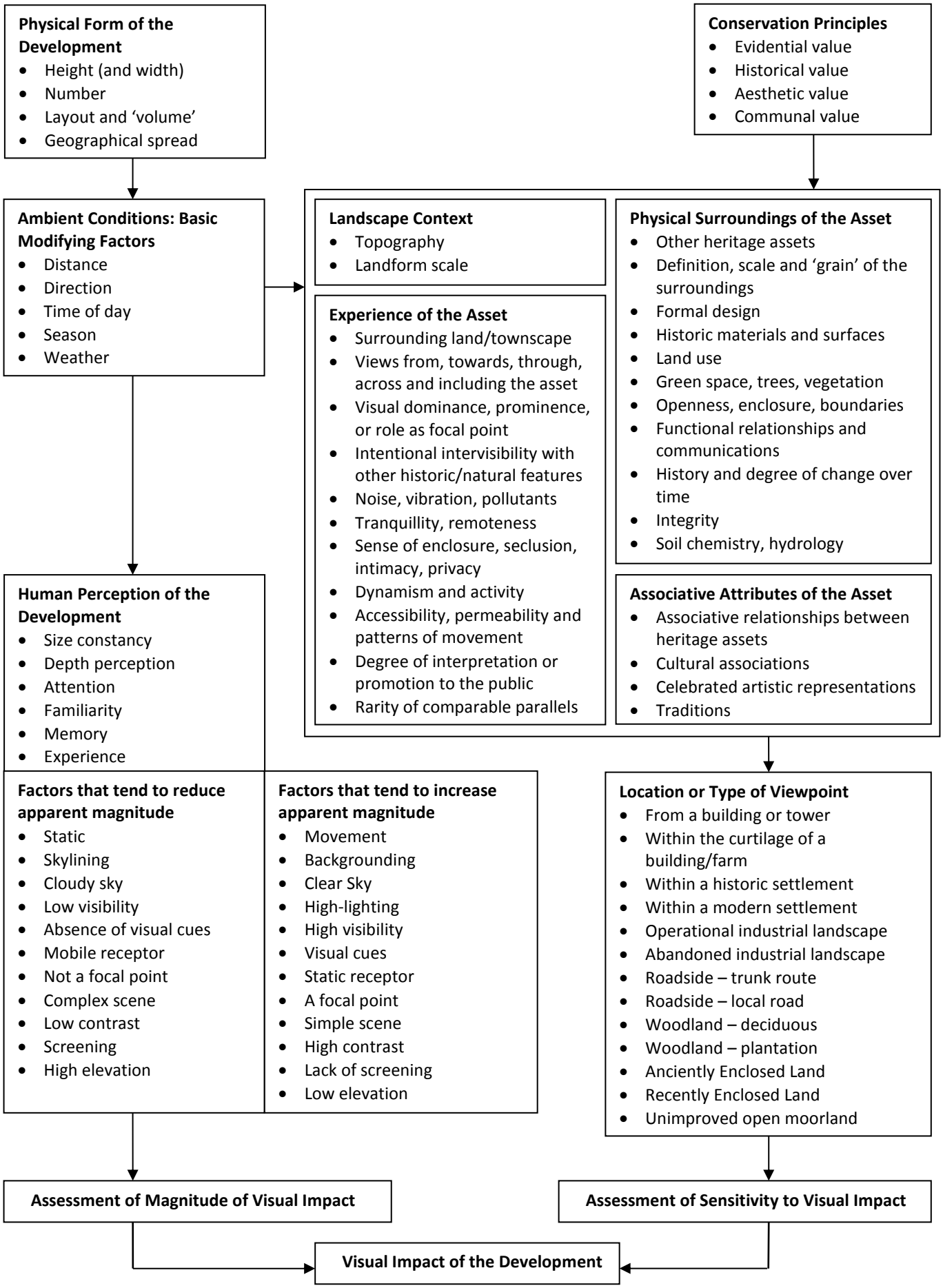
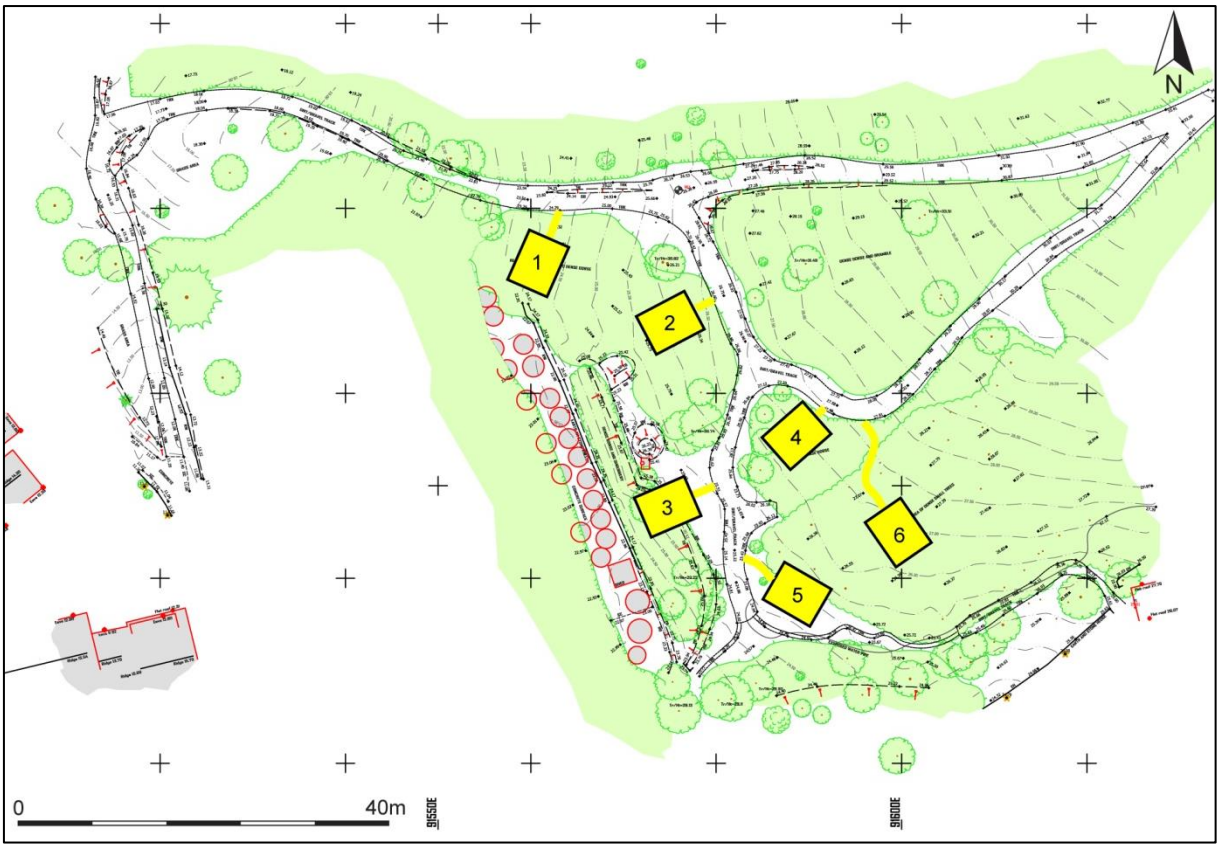


TABLE 9: THE CONCEPTUAL MODEL FOR VISUAL IMPACT ASSESSMENT PROPOSED BY THE UNIVERSITY OF NEWCASTLE (2002, 63), MODIFIED TO INCLUDE ELEMENTS OF *ASSESSMENT STEP 2* FROM THE SETTING OF HERITAGE ASSETS (HISTORIC ENGLAND 2015, 9).

APPENDIX 2: HVIA SUPPORTING PHOTOGRAPHS



APPROXIMATE LOCATIONS OF THE ORIGINAL PLANNED GLAMPING DEVELOPMENT AS A REFERENCE POINT FOR THE FOLLOWING PHOTOGRAPHS.

1. AREA OF TENT 5; VIEWED FROM THE NORTH-WEST.

2. VIEW FROM THE APPROACH TO THE SITE FROM THE NORTH-WEST; VIEWED FROM THE EAST-SOUTH-EAST.

3. VIEW FROM THE APPROACH TO THE SITE FROM THE NORTH-WEST; VIEWED FROM THE NORTH-EAST.

4. VIEW FROM THE APPROACH TO THE SITE TO THE NORTH-WEST; VIEWED FROM THE NORTH-EAST.

5. VIEW FROM THE APPROACH TO THE SITE FROM THE NORTH-WEST; VIEWED FROM THE EAST.

6. VIEW FROM THE APPROACH TO THE SITE FROM THE NORTH-WEST; VIEWED FROM THE WEST.

7. VIEW FROM THE NORTH OF TENT 1; VIEWED FROM THE NORTH.

8. WATER TANKS ADJACENT TO SITE; VIEWED FROM THE NORTH-WEST.

9. WATER TANKS ADJACENT TO THE SITE; VIEWED FROM THE SOUTH.

10. WATER TANKS ADJACENT TO THE SITE; VIEWED FROM THE SOUTH.

11. BURNER ON THE NORTH-EAST SIDE OF THE WATER TANKS ADJACENT TO THE SITE; VIEWED FROM THE EAST.

12. AREA OF TENT 4; VIEWED FROM THE NORTH-WEST.

13. VIEW FROM POINT NORTH OF TENT 4; VIEWED FROM THE SOUTH-SOUTH-EAST.

14. VIEW FROM POINT NORTH OF TENT 4; VIEWED FROM THE SOUTH-SOUTH-WEST.

15. VIEW FROM THE POINT NORTH OF TENT 4; VIEWED FROM THE NORTH-EAST.

16. VIEW FROM THE POINT NORTH OF TENT 4; VIEWED FROM THE NORTH.

17. VIEW FROM THE POINT NORTH OF TENT 4; VIEWED FROM THE NORTH-WEST.

18. VIEW FROM THE POINT NORTH OF TENT 4; VIEWED FROM THE SOUTH-WEST.

19. VIEW FROM THE POINT NORTH OF TENT 6; VIEWED FROM THE EAST-NORTH-EAST.

20. VIEW FROM THE POINT NORTH OF TENT 6; VIEWED FROM THE SOUTH-EAST.

21. AREA OF TENT 4; VIEWED FROM THE NORTH-EAST.

22. AREA OF TENT 6; VIEWED FROM THE NORTH.

23. EXISTING HUT TO THE EAST-SOUTH-EAST OF THE SITE; VIEWED FROM THE NORTH-WEST.

24. VIEW FROM BESIDE THE EXISTING HUT EAST-SOUTH-EAST OF THE SITE; VIEWED FROM THE WEST-NORTH-WEST.

25. VIEW FROM BESIDE THE EXISTING HUT EAST-SOUTH-EAST OF THE SITE; VIEWED FROM THE NORTH-NORTH-EAST.

26. THE EXISTING HUT EAST-SOUTH-EAST OF THE SITE; VIEWED FROM THE SOUTH-WEST.

27. PATH FROM THE EXISTING HUT EAST-SOUTH-EAST OF THE SITE TOWARDS THE SITE, IT BECOMES OVERGROWN; VIEWED FROM THE NORTH-EAST.

28. VIEW FROM POINT NORTH OF TENT 2; VIEWED FROM THE NORTH-WEST.

29. VIEW FROM THE POINT NORTH OF TENT 2; VIEWED FROM THE EAST.

30. VIEW FROM THE POINT NORTH OF TENT 2; VIEWED FROM THE WEST.

31. VIEW FROM THE TOP OF CAIRN/LOOK-OUT (MCO31616); VIEWED FROM THE EAST.

32. VIEW FROM THE TOP OF CAIRN/LOOK-OUT; VIEWED FROM THE SOUTH-EAST.

33. VIEW FROM THE TOP OF CAIRN/LOOK-OUT; VIEWED FROM THE SOUTH-EAST.

34. VIEW FROM THE TOP OF CAIRN/LOOK-OUT; VIEWED FROM THE NORTH.

35. THE CAIRN/LOOK-OUT ON TINKLER'S HILL; VIEWED FROM THE EAST-NORTH-EAST.

36. THE CAIRN/LOOK-OUT ON TINKLER'S HILL; VIEWED FROM THE WEST-SOUTH-WEST.

37. THE CAIRN/LOOK-OUT ON TINKLER'S HILL; VIEWED FROM THE SOUTH.

38. EVIDENCE OF DRAINAGE WORKS SOUTH OF CAIRN/LOOK-OUT; VIEWED FROM THE NORTH-NORTH-EAST.

39. LINE OF CAIRNS ON TINKLER'S HILL; VIEWED FROM THE WEST.

40. VIEW FROM THE WEST END OF THE LINE OF CAIRNS ON TINKLER'S HILL BACK TOWARDS THE CAIRN/LOOK-OUT AND THE SITE; VIEWED FROM THE NORTH-EAST

41. LINE OF CAIRNS ON TINKLER'S HILL; VIEWED FROM THE WEST.

42. VIEW ALONG THE PATH BESIDE THE CAIRNS ON TINKLER'S HILL TOWARDS THE SITE; VIEWED FROM THE NORTH-EAST.

43. THE TWO EASTERN CAIRNS IN THE LINE ON TINKLER'S HILL; VIEWED FROM THE SOUTH.

44. VIEW FROM BESIDE THE LINE OF CAIRNS TOWARDS THE SITE; VIEWED FROM THE NORTH-EAST.

45. THE TWO EASTERN CAIRNS IN THE LINE ON TINKLER'S HILL; VIEWED FROM THE SOUTH-EAST.

46. VIEW ALONG THE PATH BESIDE THE CAIRNS TOWARDS THE SITE; VIEWED FROM THE NORTH-EAST.

47. VIEW FROM THE COVE TO THE NORTH-EAST OF THE SITE; VIEWED FROM THE NORTH-EAST.

48. VIEW FROM THE ROCKY OUTCROP ON THE HEADLAND NORTH OF THE SITE (TINKLER'S POINT); VIEWED FROM THE NORTH-EAST.

49. VIEW FROM TINKLER'S POINT; VIEWED FROM THE NORTH.

50. VIEW FROM TINKLER'S POINT; VIEWED FROM THE NORTH-WEST.

51. VIEW FROM TINKLER'S POINT; VIEWED FROM THE SOUTH-EAST.

52. VIEW FROM TINKLER'S POINT; VIEWED FROM THE SOUTH-EAST.

53. VIEW FROM THE CAIRN ON TINKLER'S POINT, NORTH OF THE SITE; VIEWED FROM THE NORTH-NORTH-EAST.

54. VIEW FROM THE CAIRN ON TINKLER'S POINT, NORTH OF THE SITE; VIEWED FROM THE EAST-NORTH-EAST.

55. VIEW FROM THE CORNER OF THE BEACH SOUTH-WEST OF THE HOTEL; VIEWED FROM THE NORTH-EAST.

56. VIEW FROM THE CORNER OF THE BEACH SOUTH-WEST OF THE HOTEL; VIEWED FROM THE WEST-NORTH-WEST.

57. VIEW FROM THE CORNER OF THE BEACH SOUTH-WEST OF THE HOTEL, TOWARDS THE HOTEL AND THE SITE; VIEWED FROM THE SOUTH-WEST.

58. VIEW FROM THE CORNER OF THE BEACH SOUTH-WEST OF THE HOTEL, TOWARDS THE HOTEL AND THE SITE; VIEWED FROM THE SOUTH-WEST.

59. VIEW FROM THE BEACH TRACK SOUTH OF THE HOTEL TOWARDS LOWER TOWN AND THE SITE, THE EXISTING HUT NEAR THE SITE IS INDICATED; VIEWED FROM THE SOUTH.

60. VIEW FROM ALONG THE BEACH TRACK SOUTH OF LOWER TOWN TOWARDS THE HOTEL AND SHOWING SLOPE TO ITS REAR; VIEWED FROM THE SOUTH-SOUTH-EAST.

61. VIEW FROM ALONG THE BEACH TRACK SOUTH OF LOWER TOWN; VIEWED FROM THE SOUTH.

62. VIEW FROM EAST OF LOWER TOWN TOWARDS THE SITE; VIEWED FROM THE EAST-SOUTH-EAST.

63. VIEW TOWARDS THE SITE FROM BESIDE THE HOTEL ENTRANCE; VIEWED FROM THE SOUTH-SOUTH-WEST.

64. VIEW OF THE KARMA HOTEL FROM THE SLIP-WAY; VIEWED FROM THE SOUTH-WEST.

65. VIEW ALONG THE REAR OF THE HOTEL; VIEWED FROM THE SOUTH-EAST.

66. VIEW FROM THE PATH TO THE SITE, TO THE NORTH OF THE HOTEL; VIEWED FROM THE SOUTH.

67. VIEW FROM THE PATH TO THE SITE, TO THE NORTH THE HOTEL, TOWARDS THE SITE; VIEWED FROM THE SOUTH-WEST.

68. VIEW FROM THE PATH TO THE SITE, TO THE NORTH OF THE HOTEL, TOWARDS THE SOUTH-WEST EDGE OF THE WATER TANKS ADJACENT TO THE SITE; VIEWED FROM THE NORTH-WEST.

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