

LAND NORTH OF LITTLE
MARCLE ROAD, LEDBURY,
HEREFORDSHIRE

ARCHAEOLOGY & BUILT HERITAGE ASSESSMENT

PREPARED BY PEGASUS GROUP
ON BEHALF OF GLADMAN DEVELOPMENTS LTD

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PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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ARCHAEOLOGY AND BUILT HERITAGE ASSESSMENT

LAND NORTH OF LITTLE MARCLE ROAD, LEDBURY, HEREFORDSHIRE

ON BEHALF OF: GLADMAN DEVELOPMENTS LTD

PLANNING (LISTED BUILDING AND CONSERVATION AREAS) ACT 1990

ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREA ACT 1979

Prepared by: Donald Sutherland

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Summary

Pegasus Planning Group has been commissioned by Gladman Developments Ltd to prepare an Archaeology and Built Heritage Assessment of the proposed development site at land north of Little Marcle Road, Ledbury, Herefordshire.

Archaeological Potential

No significant prehistoric remains are recorded within the site however, due to the presence of three flint scatters, recorded within the site and Wall Hills Camp to the north-west, the site has moderate/high potential for surviving prehistoric remains.

Due to the small number of Roman finds recorded as having been found in the vicinity of the site and lack of evidence of significant activity in the vicinity, the potential for significant Romano-British surviving within the site is considered to be low.

The site appears to have formed the part of the agricultural hinterland to Ledbury from at least the medieval period. As a result, the site is considered to have low potential for significant archaeological remains from the medieval period onwards. The likelihood of encountering less

significant remains e.g. related to agriculture is considered to be high.

Settings Assessment

Development across the proposed site would result in less than substantial harm to the Scheduled Monument Wall Hills Camp through changes to its setting. Current development proposals are anticipated to result in a screening of some views towards this asset from Riverside Park and site. However, additional publicly accessible views of the hillfort location are anticipated due to the inclusion of an informal recreational route along the north-west edge of the site, with connections into the Riverside Park. As a result, the current development proposals are anticipated to result in a minor level of harm, which is clearly less than substantial, to the significance of the heritage asset, through changes to its setting.

No harm to any other heritage assets, by development within the proposed site, is anticipated.

1. Introduction

1.1 Pegasus Planning Group have been commissioned by Gladman Developments Ltd to carry out an Archaeology and Built Heritage Assessment of the proposed residential development site at land north of Little Marcle Road, Ledbury, Herefordshire as shown on the Site Location Plan provided at [Plate 1](#).

1.2 The site is approximately 18.86ha in area and is located c.120m west of the town of Ledbury, beyond Leadon Way, the River Leadon and The Riverside Park. The site comprises three irregularly shaped agricultural fields, currently under pasture.

1.3 This Archaeology and Built Heritage Assessment provides information with regards to the significance of the historic environment and archaeological resource to fulfil the requirement given in paragraph 189 of the Government's National Planning Policy Framework (the NPPF¹) which requires:

“an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.”

1.4 In order to inform an assessment of the acceptability of the scheme in relation to impacts to the historic environment and archaeological resource, following paragraphs 193 to 197 of the

NPPF, any harm to the historic environment resulting from the proposed development is also described, including impacts to significance through changes to setting.

1.5 As required by paragraph 189 of the NPPF, the detail and assessment in this Report is considered to be “*proportionate to the asset's importance*”.

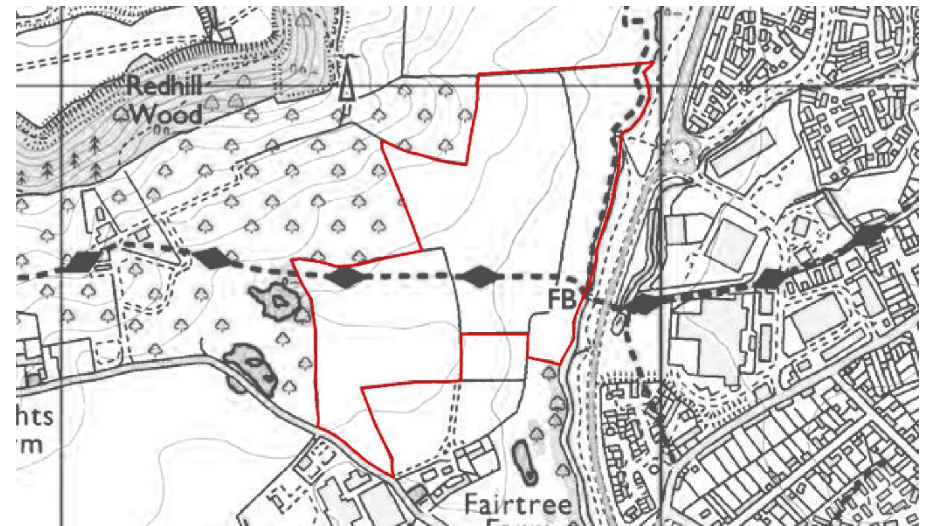


Plate 1: Site Location (not to scale)

¹ NPPF, DCLG, 2018

2. Site Description and Location

- 2.1 The site is approximately 18.86ha in area and is located c.120m west of the town of Ledbury, beyond Leadon Way, the River Leadon and The Riverside Park. The site comprises three large agricultural fields, all of which are currently under pasture (Plate 2). The land within the site is undulating, but predominantly slopes from west to east, towards the River Leadon. A ridge within the south-west of the site forms a high point.
- 2.2 The site is bounded to the north by agricultural land, to the east by The Riverside Park, beyond which lies the River Leadon, Leadon Way, then commercial and residential development within Ledbury. To the south-east of the site lies agricultural land within which are farm buildings associated with Fairtree Farm. To the south of the site lies Lily Hall Lane beyond which lie industrial buildings owned by Heineken. To the west of the site lies further agricultural land.
- 2.3 Internal and external field boundaries predominantly consist of established hedge/tree lines with post and wire/rail fences.



Plate 2: Photograph facing south-west across site, taken from north-east corner

Planning History

- 2.4 No planning history for the site was identified within recent planning history records held online by Herefordshire County Council.
- 2.5 Current proposals are for a residential development area of up to 210 dwellings covering an area of c.6.52ha with an area of green infrastructure of c.12.05ha.

3. Methodology

3.1 The aims of this Archaeology and Built Heritage Assessment are to assess the significance of the heritage resource within the site, to assess the contribution that the site makes to the heritage significance of the surrounding designated heritage assets, and to identify any harm or benefit to them which may result from the implementation of the development proposals, along with the level of any harm caused if relevant. This assessment considers the archaeological resource, built heritage and the historic landscape.

Sources of information and study area

3.2 The following key sources have been consulted as part of this assessment:

- **The National Heritage List for England for information on designated heritage assets;**
- **The Herefordshire Historic Environment Record (HER) for information on the recorded heritage resource and previous archaeological works;**
- **Archival sources, including cartographic sources, held at the Herefordshire Archive and Records Centre;**
- **Aerial photographs and documentary sources held at the Historic England Archives, Swindon; and,**
- **Online sources including aerial photographs**

and satellite imagery.

3.3 For digital data sets, information was sourced for a 1km study area. Information gathered is discussed within the text where it is of relevance to the potential heritage resource of the site. A gazetteer of recorded sites and findspots is included as **Appendix 1** and maps illustrating the resource and study area are included at the end of this report.

3.4 Designated heritage assets in the wider area were assessed as deemed appropriate (see Section 6).

3.5 Historic cartographic sources and aerial photographs were reviewed for the site, and beyond this where professional judgement deemed necessary.

Site Visit

3.6 A site visit was undertaken by Pegasus Group on Tuesday 7th August 2018, during which the site and its surrounds were visited. Selected heritage assets were assessed from publicly available areas.

3.7 The visibility on this day was clear. Surrounding vegetation was in full leaf at the time of the site visit, and thus the potential screening that this affords was also considered when assessing potential intervisibility between the site and surrounding areas.

Assessment of significance

3.8 In the NPPF, heritage significance is defined as:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance²”

3.9 Historic England’s Historic Environment Good Practice advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment³ (henceforth referred to as ‘GPA 2: Managing Significance’) gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset. In order to do this, GPA 2: Managing Significance also advocates considering the four types of heritage value an asset may hold, as identified in Historic England’s Conservation Principles⁴; **evidential, historical, aesthetic** and **communal**. These essentially cover the heritage ‘interests’ given in the glossary of the NPPF, which comprise archaeological, architectural, artistic and historic interest.

² NPPF, DCLG, 2018

³ Historic England, 2015, *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment*

3.10 *Conservation Principles* provides further information on the heritage values it identifies:

Evidential value: the potential of a place to yield evidence about past human activity. This value is derived from physical remains, such as archaeological remains, and genetic lines.

Historical value: the ways in which past people, events and aspects of life can be connected through a place to the present - it tends to be illustrative or associative. Illustrative value is the perception of a place as a link between past and present people and depends on visibility. It has the power to aid interpretation of the past through making connections with and providing insights into past communities and their activities through shared experience of a place. By contrast, associative value need not necessarily be legible at an asset, but gives a particular resonance through association with a notable family, person, event or movement.

Aesthetic value: the ways in which people draw sensory and intellectual stimulation from a place. Aesthetic values can be the result of conscious design or fortuitous outcome or a combination of the two aspects. The latter can result from the enhancement of the appearance of a place through the passage of time.

Communal value: the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. This can be through widely

⁴ English Heritage 2008 *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment*

acknowledged commemorative or symbolic value that reflects the meaning of the place, or through more informal social value as a source of identity, distinctiveness, social interaction and coherence. Spiritual value may also be part of communal value.

- 3.11 Significance results from a combination of any, some or all of the values described above.
- 3.12 Listed Buildings and Conservation Areas are generally designated for their special architectural and historic interest. Scheduling is predominantly, although not exclusively, associated with archaeological interest.

Setting and significance

- 3.13 As defined in the NPPF:

"Significance derives not only from a heritage asset's physical presence, but also from its setting."⁵

- 3.14 Setting is defined as:

"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability

to appreciate that significance or may be neutral."⁶

- 3.15 Therefore, setting can contribute to, affect an appreciation of significance or be neutral with regards to heritage values.
- 3.16 It is also important to note that whilst a physical or visual connection between a heritage asset and its setting will often exist, it is not essential or determinative. This was recently considered in a High Court Judgement⁷ where it was concluded that:

"The term setting is not defined in purely visual terms in the NPPF which refers to the "surroundings in which a heritage asset is experienced". The word "experienced" has a broad meaning, which is capable of extending beyond the purely visual".

Assessing change through alteration to setting

- 3.17 How setting might contribute to these values has been assessed within this report with reference to Historic Environment Good Practice Advice in Planning Note 3 (Second Edition): The Setting of Heritage Assets⁸ (henceforth referred to as GPA 3: The Setting of Heritage Assets), particularly the checklist given on page 11. This advocates the clear articulation of 'what matters and why'.

⁵ NPPF Annex 2, DCLG, 2018

⁶ Ibid

⁷ EWHC 1456, Steer v. Secretary of State for Communities and Local Government, Catesby Estates Limited, Amber Valley Borough Council, 2017.

⁸ Historic England, 2017, Historic Environment Good Practice Advice in Planning Note 3 (Second Edition): The Setting of Heritage Assets

- 3.18 In *GPA 3: The Setting of Heritage Assets*, a stepped approach is recommended, of which Step 1 is to identify which heritage assets and their settings are affected. Step 2 is to assess *'whether, how and to what degree settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated'*. The guidance includes a (non-exhaustive) check-list of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, green space, functional relationships and degree of change over time. It also lists points associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquillity, sense of enclosure, accessibility, rarity and land use.
- 3.19 Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to explore ways to *'maximise enhancement and minimise harm'*. Step 5 is to *'make and document the decision and monitor outcomes'*.
- 3.20 Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special

architectural or historic interest which it possesses.

Levels of significance

- 3.21 In accordance with the levels of significance articulated in the NPPF, three levels of significance are identified:
- **Designated heritage assets of the highest significance, as identified in paragraph 194 of the NPPF comprising Grade I and II* Listed buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 63 of the NPPF;**
 - **Designated heritage assets of less than the highest significance, as identified in paragraph 194 of the NPPF, comprising Grade II Listed buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas); and**
 - **Non-designated heritage assets. Non-designated heritage assets are defined within the Government's Planning Practice Guidance as "buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets"⁹.**

⁹ DCLG, Planning Practice Guidance, Paragraph: 039 (ID: 18a-039-20140306, Revision date: 06 03 2014)

3.22 Additionally, it is of course possible that sites, buildings or areas have **no heritage significance**.

Assessment of harm

3.23 Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against, such as whether a proposed development preserves or enhances the character or appearance of a Conservation Area, and articulating the scale of any harm in order to inform a balanced judgement/weighting exercise as required by the NPPF.

3.24 In order to relate to key policy, the following levels of harm may potentially be identified:

- **Substantial harm or total loss. It has been clarified in a High Court Judgement of 2013¹⁰ that this would be harm that would 'have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced'; and**
- **Less than substantial harm. Harm of a lesser level than that defined above.**

3.25 It is also possible that development proposals will cause **no harm or preserve** the significance of heritage assets. A High Court Judgement of 2014 is relevant to this¹¹. This concluded that with regard to preserving the setting of a Listed building or

preserving the character and appearance of a Conservation Area, 'preserving' means doing 'no harm'.

3.26 Preservation does not mean no change; it specifically means no harm. *GPA 2: Managing Significance* states that "**Change to heritage assets is inevitable but it is only harmful when significance is damaged**". Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

3.27 As part of this, setting may be a key consideration. For an evaluation of any harm to significance through changes to setting, this assessment follows the methodology given in *GPA 3: The Setting of Heritage Assets*, described above. Again, fundamental to the methodology set out in this document is stating 'what matters and why'. Of particular relevance is the checklist given on page 13 of *GPA 3: The Setting of Heritage Assets*.

3.28 It should be noted that this key document states that:

"setting is not itself a heritage asset, nor a heritage designation"¹²

3.29 Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage values that

¹⁰ EWHC 2847, R DCLG and Nuon UK Ltd v. Bedford Borough Council

¹¹ EWHC 1895, R (Forge Field Society, Barraud and Rees) v. Sevenoaks DC, West Kent Housing Association and Viscount De L'Isle

¹² Historic England, 2017, Historic Environment Good Practice Advice in Planning Note 3 (Second Edition): The Setting of Heritage Assets

contribute to this significance, through changes to setting.

3.30 With regards to changes in setting, GPA 3: The Setting of Heritage Assets states that “conserving or enhancing heritage assets by taking their settings into account need not prevent change”.

3.31 Additionally, it is also important to note that, as clarified in the Court of Appeal¹³, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor, would necessarily require planning permission to be refused.

Benefits

3.32 Proposed development may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage values and hence the significance of the assets concerned.

¹³ Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061 (4th November 2016)

4. Planning Policy Framework

- 4.1 This section of the Statement sets out the legislation and planning policy considerations and guidance contained within both national and local planning guidance which specifically relate to the application site, with a focus on those policies relating to the protection of the historic environment.

Legislation

- 4.2 Legislation relating to the Built Historic Environment is primarily set out within the Planning (Listed Buildings and Conservation Areas) Act 1990 which provides statutory protection for Listed Buildings and Conservation Areas.
- 4.3 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

“In considering whether to grant planning permission [or permission in principle] 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.”

- 4.4 In the 2014 Court of Appeal judgement in relation to the Barnwell Manor case¹⁴, Sullivan LJ held that:

“Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight” when the decision-maker carries out the balancing exercise.”

- 4.5 A judgement in the Court of Appeal¹⁵ (‘Mordue’) has clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134 of the previous draft of the NPPF, the requirements of which are now given in paragraph 196 of the revised NPPF, see below), this is in keeping with the requirements of the 1990 Act.
- 4.6 With regards to development within Conservation Areas, Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states:

“In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”

- 4.7 Scheduled Monuments are protected by the provisions of the

¹⁴ East Northamptonshire District Council v SSCLG (2015) EWCA Civ 137

¹⁵ Jones v Mordue Anor (2015) EWCA Civ 1243

Ancient Monuments and Archaeological Areas Act 1979 which relates to nationally important archaeological sites. Whilst works to Scheduled Monuments are subject to a high level of protection, it is important to note that there is no duty within the 1979 Act to have regard to the desirability of preservation of the setting of a Scheduled Monument.

- 4.8 Notwithstanding the statutory presumption set out within the Planning (Listed Buildings and Conservations Area) Act 1990, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.

National Policy Guidance

The National Planning Policy Framework (July 2018)

- 4.1 National policy and guidance is set out in the Government's National Planning Policy Framework (NPPF) published in July 2018. This replaced and updated the previous National Planning Policy Framework 2012. The NPPF needs to be read as a whole and is intended to promote the concept of delivering sustainable development.
- 4.2 The NPPF sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The NPPF continues to recognise that the planning system is plan-led and that therefore Local Plans,

incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application, including those which relate to the historic environment.

- 4.3 The overarching policy change applicable to the proposed development is the presumption in favour of sustainable development. This presumption in favour of sustainable development (the 'presumption') sets out the tone of the Government's overall stance and operates with and through the other policies of the NPPF. Its purpose is to send a strong signal to all those involved in the planning process about the need to plan positively for appropriate new development; so that both plan making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than barriers. Conserving historic assets in a manner appropriate to their significance forms part of this drive towards sustainable development.
- 4.4 The purpose of the planning system is to contribute to the achievement of sustainable development and the NPPF sets out three 'objectives' to facilitate sustainable development: an economic objective, a social objective, and an environmental objective. The presumption is key to delivering these ambitions, by creating a positive pro-development framework which is underpinned by the wider economic, environmental and social provisions of the NPPF. The presumption is set out in full at paragraph 11 of the NPPF and reads as follows:

“Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;**
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:**
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or**
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.**

For decision-taking this means:

- c) approving development proposals that accord with and up-to-date development plan without delay; or**
- d) where there are no relevant development plan policies, or the**

policies which are most important for determining the application are out-of-date granting permission unless:

- i. the application policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or**
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”**

4.5 However, it is important to note that footnote 6 of the NPPF applies in relation to the final bullet of paragraph 11. This provides a context for paragraph 11 and reads as follows:

“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change.” (our emphasis)

4.6 The NPPF continues to recognise that the planning system is plan-led and that therefore, Local Plans, incorporating

Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application.

4.7 Heritage Assets are defined in Annex 2 of the NPPF as:

"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the Local Planning Authority (including Local Listing)"

4.8 The NPPF goes on to define a Designated Heritage Asset as a:

"World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation¹⁶" (our emphasis)

4.9 As set out above, significance is also defined as:

"The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance¹⁷"

4.10 Section 16 of the NPPF relates to 'Conserving and enhancing the

historic environment' and states at paragraph 190 that:

"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 into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal"

4.11 Paragraph 192 goes on to state that:

"In determining planning applications, local planning authorities should take account of:

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

4.12 With regard to the impact of proposals on the significance of a heritage asset, paragraphs 193 and 194 are relevant and read as follows:

¹⁶ NPPF Annex 2, DCLG, 2018

¹⁷ IBID

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

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

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

4.13 Section b) of the above describing assets of the highest significance also includes footnote 63 of the NPPF, which states that non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

4.14 In the context of the above, it should be noted that paragraph 195 reads as follows:

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

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

4.15 Paragraph 196 goes on to state:

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

4.16 The NPPF also provides specific guidance in relation to development within Conservation Areas, stating at paragraph 200 that:

“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”

- 4.17 Paragraph 201 goes on to recognise that *“not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance”* and with regard to the potential harm from a proposed development states:

“Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole” (our emphasis)

- 4.18 With regards to non-designated heritage assets, paragraph 197 of NPPF states that:

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

or loss and the significance of the heritage asset.”

- 4.19 Non-designated assets of archaeological interest which are demonstrably of equivalent significance to a scheduled monument will be subject to the policies for designated heritage assets.

National Planning Guidance

- 4.20 The Department for Communities and Local Government (DCLG) launched the planning practice web based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled.
- 4.21 This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of planning practice guidance documents to be read alongside the NPPF.
- 4.22 The PPG has a discrete section on the subject of ‘Conserving and enhancing the historic environment’ which confirms that the consideration of ‘significance’ in decision taking is important and states:

“Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential

impact and acceptability of development proposals¹⁸

- 4.23 In terms of assessment of substantial harm, the PPG confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

“In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting¹⁹.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm” (our emphasis)

¹⁸ PPG, paragraph 009 (ID: 18a-009/20140306 revision date 06.03.2014)

Local Planning Policy

- 4.24 Planning applications within Ledbury are currently considered against the policy and guidance set out within Policy LD4 of the Herefordshire Local Plan Core Strategy 2011 – 2031 (adopted October 2015).

Policy LD4 – Historic environment and heritage assets

Development proposals affecting heritage assets and the wider historic environment should:

- 1. Protect, conserve, and where possible enhance heritage assets and their settings in a manner appropriate to their significance through appropriate management, uses and sympathetic design, in particular emphasising the original form and function where possible;**
- 2. where opportunities exist, contribute to the character and local distinctiveness of the townscape or wider environment, especially within conservation areas;**
- 3. use the retention, repair and sustainable use of heritage assets to provide a focus for wider regeneration schemes;**
- 4. record and advance the understanding of the significance of any heritage assets to be lost (wholly or in part) and to make**

¹⁹ PPG, paragraph 017 (ID: 18a-017-20140306 revision date 06.03.2014)

this evidence or archive generated publicly accessible and

5. where appropriate, improve the understanding of and public access to the heritage asset.

The scope of the works required to protect, conserve and enhance heritage assets and their settings should be proportionate to their significance. Development schemes should emphasise the original form and function of any asset and, where appropriate, improve the understanding of and public access to them.

Local Plan Policies with regards to the NPPF and the 1990 Act.

4.25 With regard to Local Plan policies, paragraph 213 of NPPF states that:

“existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).”

4.26 In this context, where local plan policy was adopted well before the NPPF, and does not allow for the weighing of harm against public benefit for designated heritage assets (as set out within

Paragraph 196 of the NPPF) or a balanced judgement with regards to harm to non-designated heritage assets (see NPPF Paragraph 197) then local planning policies would be considered to be overly restrictive compared to the NPPF, thus limiting the weight they may be given in the decision-making process.

4.27 With regards to the Herefordshire Local Plan Core Strategy 2011 – 2031, the plan and policy LD4 were adopted before the inception of the NPPF and do not allow for the balancing exercise to be undertaken. As such, the policies are not considered to reflect the guidance within the NPPF and thus the weight that can be attached to it in the decision-making process is limited.

Emerging Policy

4.28 On 25th September 2017, Ledbury Town Council completed consultation on a draft of the Ledbury Neighbourhood Development Plan 2017-2031 which covers the proposed development area.

4.29 A draft of the plan was available at the time this report was written and had no policies expressly relating to heritage. References to heritage within the report are largely confined to the historic core of the settlement.

5. The Historic Environment

5.1 This section provides a review of the recorded heritage resource within the site and its vicinity in order to identify any extant heritage assets within the site and to assess the potential for below-ground archaeological remains. Designated heritage assets and HER records are illustrated on Figures 1-4. Designated heritage assets are referenced using their seven-digit NHLE number, HER 'event' numbers have the prefix EHE and HER 'monument' numbers have the prefix DHE. A gazetteer of heritage data is included as [Appendix 1](#).

Designated Heritage Assets

- 5.2 No designated heritage assets are recorded within the site.
- 5.3 Designated heritage assets in the vicinity of the site are considered in further detail in the *Setting Assessment* section below.

Previous Archaeological Works

- 5.4 No previous archaeological works have been undertaken within the site.
- 5.5 A large number of previous archaeological works are recorded within the wider vicinity of the site however few are within close

proximity to the site and are of relevance to the site's archaeological potential. Only a single instance of previous archaeological work was identified which was considered of relevance to the site's archaeological potential. This comprised a field survey, undertaken at New Mills, Ledbury Rural, c.55m east of the site (ref. EHE4789). This will be discussed further within the relevant chronological section. Others are included within Appendix 1 and Figure 3.

Topography, geology and the palaeoenvironment

- 5.6 The site consists of undulating ground which largely slopes from west down to east, towards the River Leadon. A ridge lies in the south-west of the site, forming a high point in this location at c.56m aOD. The north-west of the site lies at c.54m aOD and the south-east at c.48m aOD. The land beyond the site to the north-west rises to the highpoint of the hillfort.
- 5.7 The bedrock across the site is mapped as Raglan Mudstone Formation – Siltstone and Mudstone, Interbedded. This sedimentary bedrock formed during the Silurian Period (approximately 419 to 424 million years ago), in a local environment previously dominated by rivers.²⁰

²⁰ British Geological Survey, 2018, <http://mapapps.bgs.ac.uk/geologyofbritain/home.html>, accessed August 2018

- 5.8 No superficial deposits are mapped within the site.

Prehistoric (pre-43 AD)

- 5.9 Two small concentrations of possible Bronze Age flint are recorded as having been found within the western area of the site (refs. MHE3543 and MHE3544). Further prehistoric flint is recorded as having been found in the northern area of the site (ref. MHE3545).
- 5.10 A further prehistoric flint site is recorded c.280m north of the site (ref. MHE3546). Prehistoric flints are recorded as having been found at several points within and in close proximity to Wall Hills Camp, c.455m north-west of the site (ref. MHE3547), c.520m north-west of the site (ref. MHE3548), c.780m west-north-west of the site (ref. MHE3550) and c.920m north-west of the site (ref. MHE3551),
- 5.11 Scattered prehistoric flints are recorded as having been found at Groves End Farm, c.875m north-west of the site (ref. MHE3555).
- 5.12 A single Bronze Age findspot is recorded on the Portable Antiquity Scheme's database. However, as the location provided is not exact, its direct relevance to the site cannot be discerned.
- 5.13 The Scheduled Monument Wall Hills Camp is an Iron Age hillfort which is recorded c.230m north-west of the site (refs. MHE307; NHLE ref. 1001760). The hillfort occupies the plateau-like summit at the extremity of Wall Hills. It consists of an inner enclosure (c.5 acres) and outer enclosure (c.25 acres),

separated by a rampart and wet outer ditch with a high, steep inner scarp and outer rampart following natural contours. The general plan and typology of the hillfort suggests that it dates to the early Iron Age. No excavations are recorded as having been undertaken at the site.

- 5.14 A series of five lynchets, running on a north-south alignment are recorded west of Wall Hills Camp, c.885m west-north-west of the site (ref. MHE3224). These are thought to be indicative of Iron Age field systems, potentially associated with the hillfort.
- 5.15 'The Grove', an undated track or possible outworks of a hillfort is recorded at Wall Hills, c.135m west from the site (ref. MHE8194).

Romano-British (AD 43 - 410)

- 5.16 A single Roman findspot is recorded on the Portable Antiquity Scheme's database. However, as the location provided is not exact, its direct relevance to the site cannot be discerned.
- 5.17 Romano-British findspots comprising Roman bronze coins and sherds of Roman pottery are recorded as having been found at Wall Hills Camp, c.520m north-west of the site (ref. MHE3008).
- 5.18 A Romano-British occupation site is recorded c.935m north-east of the site (ref. MHE8391). An archaeological evaluation revealed evidence of Romano-British occupation and enclosure ditches. Although no structural remains were identified, the considerable assemblages of pottery and animal bone are thought to be indicative of domestic settlement nearby. There is

evidence of more than one phase of activity at the site with suggestions that domestic activity continued after the abandonment of the enclosure ditches.²¹

- 5.19 A scatter of three sherds of Roman pottery along with some possible Roman tile were found during a survey in advance of development c.405m north-east of site (refs. MHE1695; EHE4789).

Early medieval (410 AD – 1066) and Medieval (1066 – 1539)

- 5.20 Several early medieval and medieval findspots are recorded on the Portable Antiquity Scheme's database however as the locations provided are not exact, their direct relevance to the site cannot be discerned.
- 5.21 The possible site of Walkers Mill is inferred by documentary evidence in an area c.80m south-east of the site (ref. MHE14497). The mill is first mentioned in a lease by the Bishop to Richard Willison in 1550 but is likely to predate this.
- 5.22 Two 15th-century timber-framed, cruck-trussed barns are recorded at Wall Hills, c.340m north-north-west of the site (ref. MHE17411). The barns were originally built independently but were later joined to make a T-shaped building; they were raised in the 19th century. A possible 16th-century barn of cruck construction with square framing and brick infill is also recorded

at Wall Hills Farm (ref. MHE2006).

- 5.23 Sherds of 12th-century pottery are recorded as having been found at Wall Hills Camp, c.520m north-west of the site (ref. MHE3123).
- 5.24 The possible site of the medieval 'New Myll' is inferred from documentary sources at an area c.655m north-north-east of the site (ref. MHE14496). A lease was granted for the site in 1532 and it is suggested that the mill was replaced by two mills on adjoining land in the 16th century.
- 5.25 The location of a former moat is inferred from documentary evidence and is recorded c.825m south-east of the site (ref. MHE10272).
- 5.26 Ridge and furrow earthworks or the former locations of ridge and furrow earthworks are recorded c.905m south-west; c.980m south-west; c.420m east-north-east; c.925m south-east; c.480m south-east; c.985m west-north-west; and c.790m north-west of the site (refs. MHE23583, MHE23584, MHE23980, MHE23869, MHE23966, MHE24108 and MHE2189).

Early medieval and medieval Heritage within Ledbury's Historic Core

- 5.27 Ledbury is known to have been a market town from the medieval period onwards. A medieval market place is recorded at Bye Street c.890m east of the site (ref. MHE9976). This appears to

²¹ Leonard, C., 2017, *Land North of the Viaduct, Ledbury, Herefordshire: Archaeological Evaluation*, Cotswold Archaeology

have developed as a secondary market in the medieval period and probably held market stalls in 1288; these probably became shops by the end of the medieval period. This row of shops is recorded c.850m east of the site (ref. MHE9995). The extent of the row in the medieval period is not known but it is shown as intermittent on early maps of the town. Buildings in this shop row still survive although none are Listed.

- 5.28 The former locations of medieval tenement plots are recorded to the north of Bye Street, c.935m and c.820m east of the site (refs. MHE9986 and MHE9987). Additional tenement plots are recorded to the west of Homend, c.965m east-north east from the site (ref. MHE10431). No medieval buildings are known in this area however, it is possible that these represent a late medieval or post-medieval extension to the town.
- 5.29 The Brewery Inn is an extant 15th-century building. The former brewery, now pub, is recorded at Bye Street, c.975m east of the site (ref. MHE3723). The early elements of the building are largely hidden by a facing, except at the rear. A cellar floor is recorded as consisting of cobbles, flags and brick.
- 5.30 Residual medieval pottery was found during a watching brief at Market Theatre, recorded c.995m east of the site (ref. EHE31792).
- 5.31 The old course of a stream is recorded c.980m east of the site (ref. MHE9972). The stream is recorded in a medieval document as flowing 'from the Upper Hall to the garden of the Lower Hall then to the kings highway'.

Post-medieval (1540 – 1800)

- 5.32 A large number of post-medieval and modern finds, features and buildings are recorded within the historic core of Ledbury and in the wider study area. However, as this is not directly relevant to the site, this will not be covered in detail in this section. Post-medieval and modern heritage within Ledbury and beyond c.500m of the site is referenced in Appendix 1 and illustrated in Figure 2.
- 5.33 Several post-medieval findspots are recorded on the Portable Antiquity Scheme's database however as the locations provided are not exact, their direct relevance to the site cannot be discerned.
- 5.34 Cannon balls potentially relating to the Civil War 'Battle of Ledbury' in 1645 are recorded as having been found at Wall Hills Camp, c.520m north-west of the site (ref. MHE3123).
- 5.35 A large number of other post-medieval, Grade II Listed buildings are also recorded in the vicinity of the proposed development site. The majority of these lie within the historic core of Ledbury, to the east of the site however several, isolated agricultural buildings are also recorded in the wider vicinity, including Fairtree Farm which lies c.55m south of the site (see Figure 4).
- 5.36 The Grade II Listed Flights Farm potentially dates to the 16th or 17th century is recorded c.440m west of the site (ref. MHE2008; NHLE ref. 1268381). The two-storeyed, timber-framed farmhouse has lower stone courses and a tiled roof.

- 5.37 Several historic farms were also recorded in the vicinity of the site as part of the Herefordshire Historic Farmsteads Characterisation Project. These include Wallhills Farm (Lower Wallhills Farm) which is recorded c.335m north-north-west of the site (ref. MHE21058) and Fairtree Farm, recorded c.55m south of the site (ref. MHE21059). Outbuildings including a 17th-century timber-framed barn with stable at right angles are also recorded at Fairtree Farm, (ref. MHE1816).
- 5.38 The site of Camp Farm, an 18th-century house, is recorded on a 1721 map as lying c.185m west of the site (ref. MHE6918); the building is not depicted on the 1813 enclosure map.
- 5.39 The former location of an 18th-century vineyard is recorded at Flights Farm, c.485m west of the site (ref. MHE5649).
- 5.40 There is documentary evidence for a post-medieval mill, recorded c.465m north of the site (ref. MHE5397). The mill is recorded as having been partially obliterated by the bypass.
- 5.41 The former site of a post-medieval factory is recorded c.160m south of the site (ref. MHE14994) The site of the former Ballard Brickworks, dating to the 19th century, is recorded c.110m south of the site (ref. MHE13945) and that of the 19th-century Fairtree Farm Brick and Tile Works is recorded c.75m west of the site (ref. MHE14796).
- 5.42 The New Street toll house is recorded c.315m south-east of the site (refs. MHE15924).
- 5.43 The former site of the Ledbury Second World War German

Prisoner of War Camp is recorded c.470m south-south-east of the site (ref. MHE15509). The site is now occupied by the John Masefield School.

Site Development

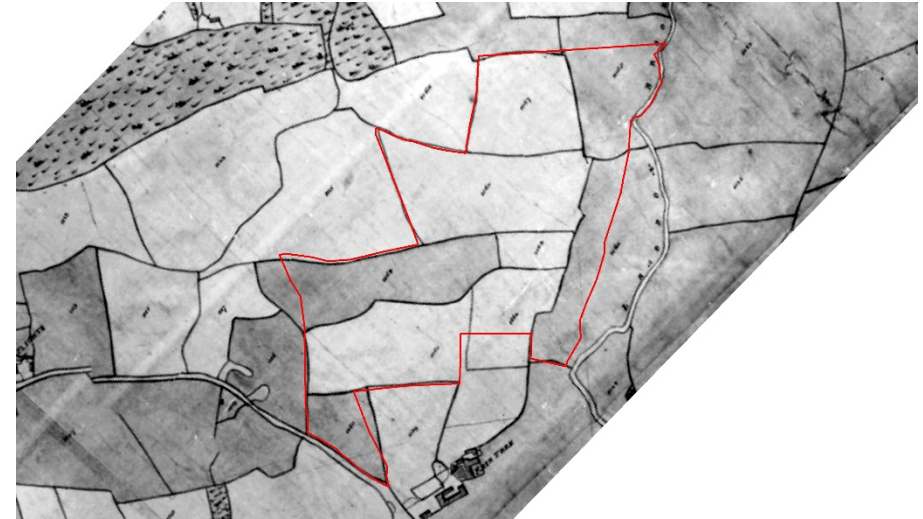


Plate 3: 1839 Tithe Map Extract

- 5.44 The Tithe Map of 1839 (Plate 3) shows the site as lying across several agricultural fields. No structures are represented within the proposed development site but Fairtree Farm is evident to the south.

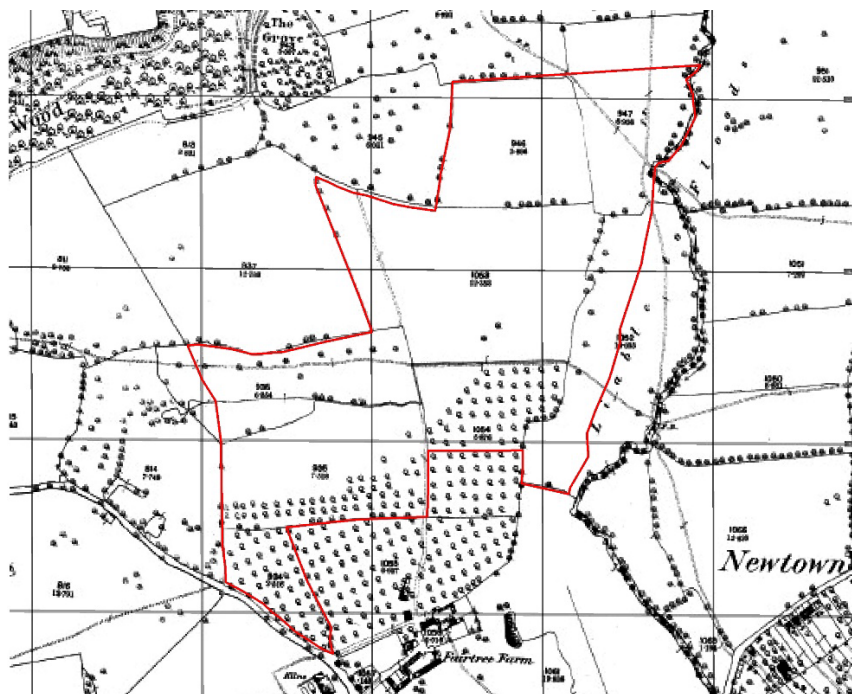


Plate 4: 1st Edition OS Map, 1887, Extract

5.45 The First Edition OS map, dated 1887 (Plate 4), shows some alteration of field boundaries within the site but no significant changes otherwise. On this map, portions of the south of the site appear to be in use as orchard. The public footpaths which exist today are evident on this map. Kilns are represented to the south of the site, beyond Little Marcle Road, and increased development can be observed to the south-east, labelled as Newtown, and representing the expansion of Ledbury.

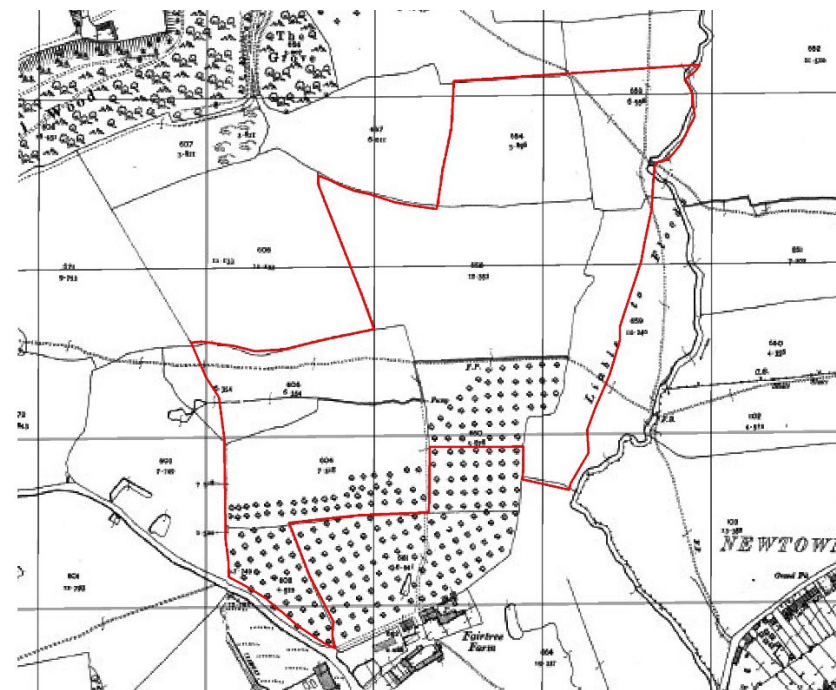


Plate 5: 2nd Edition OS Map, 1904, Extract

5.46 The Second Edition OS Map, dated 1904 (Plate 5), shows no significant changes within the site. However, increased development can be observed to the south-east and a larger building is represented to the south, in the location of the former kilns.

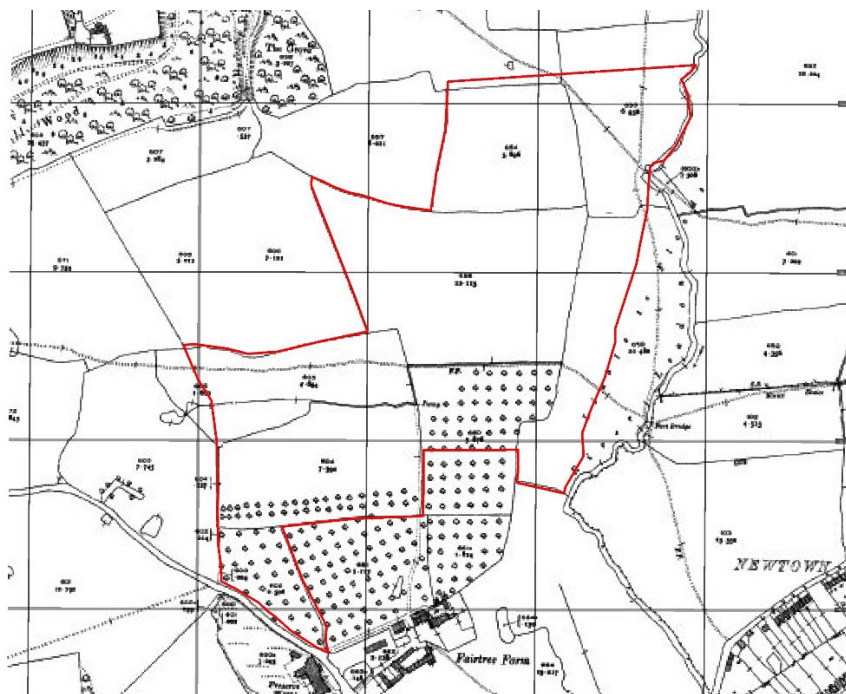


Plate 6: 1929 OS Map Extract

5.47 The 1929 OS Map (Plate 6) shows no significant changes within the site or its environs.



Plate 7: 1946 Aerial Photograph of site

5.48 An aerial photograph dating to 1946 (Plate 7) shows no significant changes within the site. However, the probable areas of orchard within the south of the site appear sparser than was represented on the earlier maps. Increased development is also observable to the south of Little Marcle Road and to the south-east, on the edge of Ledbury.



Plate 8: 1964 Aerial Photograph of site

5.49 An aerial photograph of the site, dating to 1964 (Plate 8) shows further loss of the former orchard with no associated trees now evident within the site. No other changes are evident within the site. However, increased industrial development is observable to the south, beyond Little Marcle Road.



Plate 9: 1971 Aerial Photograph of site

5.50 An aerial photograph of the site, dating to 1971 (Plate 9), shows no significant changes within the site.

Summary of Archaeological Potential

- 5.51 Although no archaeological features have been identified, three flint scatters are recorded within the site which may be indicative of prehistoric activity in the vicinity. This, along with the proximity to Wall Hills Camp, makes the likelihood of encountering prehistoric archaeological remains moderate/high. However, there is no evidence to suggest remains of a schedulable quality, that would represent a major constraint to development, are present within the site.
- 5.52 A small number of Roman finds are recorded as having been found in the vicinity of the site and there is little evidence of

significant activity, but with the only clear evidence of Romano-British occupation recorded over 900m away. As a result, the potential for significant Romano-British remains being encountered within the site is considered low.

- 5.53 The site appears to have formed the part of the agricultural hinterland to Ledbury from at least the medieval period. As a result, the likelihood of encountering significant remains from the medieval period onwards is considered to be low. The likelihood of encountering less significant remains e.g. related to agriculture is considered to be high.

6. Setting Assessment

6.1 Step 1 of the methodology recommended by the Historic England guidance *GPA 3: The Setting of Heritage Assets* (see *Methodology* above) is to identify which heritage assets might be affected by a proposed development.

6.2 Development proposals may adversely impact heritage assets where they remove a feature which contributes to the significance of a heritage asset or where they interfere with an element of a heritage asset's setting which contributes to its significance, such as interrupting a key relationship or a designed view.

6.3 Consideration was made as to whether any of the heritage assets present within or beyond the 1km study area include the site as part of their setting, and therefore may potentially be affected by the proposed development.

6.4 Assets in the vicinity identified for further assessment on the basis of proximity to the site and inter-visibility comprise:

- **Scheduled Monument, Wall Hills Camp, located c.230m north-west of the site (NHLE ref. 1001760).**
- **Grade II Listed Fairtree Farmhouse and Oasthouse (NHLE ref. 1082593) and the nearby group of Grade II Listed outbuildings (NHLE ref. 1349497), located c.55m south of the site.**
- **The Grade II* Listed Barn to the South of Wall**

Hills Farmhouse, located c.365m north-north-west of site (NHLE ref. 1224771).

- **Grade II Listed Ledbury Viaduct, located c.765m north-north-east of the site (NHLE ref. 1266703).**
- **Ledbury Conservation Area and associated designated heritage assets, located c.920m east of the site (ref. DHE6270).**

6.5 Other assets within the wider area, excluded on the basis of distance from the site, lack of inter-visibility and lack of historical association comprise:

- **Grade II Listed buildings within historic core of Ledbury, recorded c.750m east of site.**
- **Grade II Listed Milestone recorded c.860m south of site (NHLE ref. 1082602). Grade II Listed Milestone recorded c.605m north-east of site (NHLE ref. 1266667).**
- **Grade II Listed Groves End Farmhouse and Grade II Listed barn to the south-east, recorded c.880m north-west of the site (NHLE refs. 1349502 and 1266668).**
- **Grade II Listed Flights Farmhouse, located c.440m west of the site (NHLE ref. 1268381).**

Wall Hills Camp (Scheduled Monument)

- 6.6 Wall Hills Camp is an Iron Age Hillfort surviving as earthworks on the plateau-like summit at the extremity of Wall Hills. The Scheduled Monument is screened from the site by woodland. However, the location of the hillfort is intelligible from the surrounds as a tree-topped hill (Plate 10), with prior knowledge. The hillfort is a Scheduled Monument and is therefore a heritage asset of the highest significance, as defined by the NPPF.



Plate 10: Photograph facing west-north-west from public footpath in north-east of site towards Wall Hills Camp location

- 6.7 The hillfort is set within largely agricultural land but is surrounded to the north, south and east by an unbroken band of woodland which obscures the remains from view from the wider vicinity. Broken woodland lies to the north-west of the monument and it is likely that views extend in this direction from

the interior of the hillfort (access to the interior was not possible).

- 6.8 Beyond the woodland, the wider vicinity of the hillfort to the north, south and east comprises agricultural land, beyond this to the north lies the railway line, and to the east lies the bypass, with residential development of the town of Ledbury beyond.



Plate 11: Photograph facing west from public footpath east of Ledbury with site and Wall Hills visible beyond Ledbury

- 6.9 Wall Hills Camp primarily gains significance from its physical form and has significant evidential and historical value. Setting does contribute to the heritage asset's significance, primarily its immediate location atop the hill but also its location and visibility within the wider landscape.



Plate 12: Photograph facing west-north-west from public footpath within Riverside Park towards Wall Hills. Proposed development site is visible beyond post and rail fence

- 6.10 Due to the defensive and high-status nature of the asset, visibility of the asset and views of the surrounding landscape from the hillfort would have been an important factor in its placement. Views of the surrounding landscape from the asset are not currently appreciable due to a lack of public access and historic maps of the site indicate that the hilltop has been largely obscured by woodland since at least 1839.
- 6.11 The hilltop is not readily visible from Leadon Way to the east of the site, being screened by vegetation from the road and from most of The Riverside Park. However, the hilltop is visible from points within Riverside Park (Plate 12) and is readily visible from public footpaths running north to south and west to east, to the west of Leadon Way.

- 6.12 No clear views were identified from within Ledbury, further to the east, being screened by the existing built form. However, occasional views of the hillfort are possible from a public footpath which runs along a slope on the eastern edge of Ledbury (Plate 11).
- 6.13 The hill-top location is not readily appreciable from Lilly Hall Lane to the south of the site, however, occasional glimpsed views of woodland on the side of the hill may be possible in winter months when vegetation is not in leaf.
- 6.14 Although the hilltop location of the hillfort can be appreciated from the proposed development site and beyond, reciprocal views from the hillfort are not anticipated to be possible and were not available at the time of designation due to vegetation. The heritage asset cannot presently be readily appreciated as a hillfort due to the lack of public access and the fact that the hill-top location is obscured by woodland. Access was sought at the time of the site visit but was not possible due to the presence of livestock.
- 6.15 The site forms part of a buffer of undeveloped, agricultural land between the heritage asset and Ledbury which contributes to the understanding and visibility of the hill upon which the heritage asset lies. However, the landscape will have changed considerably since the Iron Age with the heritage asset's current settings not reflecting the surrounds contemporary with its construction.
- 6.16 Hillforts in Herefordshire 'appear to have been built