

Heritage Statement – Structural  
Repairs to External Walls and Floor  
of Sitting Room

**Wonham Barton, Bampton, Devon  
EX16 9JZ**

For

**Mr Anthony Rew**



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# CONTENTS

Executive Summary.....	1
1 Introduction.....	2
1.1 Purpose of statement.....	2
1.2 Methodology and sources of information.....	3
2 Description and Development History of the Application Site and its Wider Environs.....	4
2.1 Location and outline description.....	4
2.2 Summary of historical development of the application site and its surrounding area.....	7
3 The Identification of Heritage Assets Being Potential Receptors of Heritage Impacts.....	17
3.1 Introduction.....	17
3.2 The identification of potential receptors of impacts from the development proposals.....	22
3.3 Designated heritage assets within or including the application site.....	23
3.4 Non-designated heritage assets within or including the application site.....	24
3.5 Designated heritage assets within the wider environs of the site.....	25
3.6 Non-designated heritage assets within the wider environs of the site.....	25
4 Heritage Legislation and Policy Context.....	26
4.1 National legislation and policy context.....	26
4.2 Local policy context.....	27
5 Assessment of Potential Impacts.....	29
5.1 Introduction and general observations.....	29
5.2 Potential receptors of impacts.....	29
5.3 Assessment of potential heritage impacts.....	30
5.4 Findings from the heritage impact assessment.....	35

## EXECUTIVE SUMMARY

1. This independent heritage statement provides an assessment of the significance of built and/or cultural heritage in the environs of the application site at Wonham Barton, Bampton, Devon EX16 9JZ, and of the impact of the submitted development proposal on that significance. The statement has been commissioned by Mr Anthony Rew and covers built and/or cultural heritage, but not archaeology.
2. The planning submission, which comprises a listed building consent application, relates to the proposal to undertake essential structural repairs to the external wall and internal floor of the sitting room of Grade II listed Wonham Barton Farmhouse following structural movement resulting from changing ground conditions.
3. The statement sets out the development history of the application site and its wider environs.
4. It finds that the only designated heritage asset that might have the potential to receive impacts from the development proposals is the Grade II listed farmhouse itself.
5. After considering relevant national legislation and national and local heritage policy, a detailed assessment is made of the potential for the development proposals to affect the significance of this designated heritage asset. The statement concludes that, overall, the proposed works are essential to safeguard the significance of the listed building and, given the interventions required, will result in no harm to the significance of the listed building and arguably will be of minor beneficial effect.
6. Accordingly, it is considered that the application complies with the intent of Section 66 of the 1990 Planning (Conservation Areas and Listed Buildings) Act and with national heritage policy regarding harm in the NPPF. Similarly, at a local level, the proposals in the application pass the tests relating to development affecting the historic environment set by the Council's Local Plan policies.

# 1 INTRODUCTION

## 1.1 Purpose of statement

This independent heritage statement provides an assessment of the significance of built and/or cultural heritage in the environs of the application site at Wonham Barton, Bampton, Devon EX16 9JZ, and of the impact of the submitted development proposal on that significance. The statement has been commissioned by Mr Anthony Rew to form part of the planning submission to Mid Devon District Council for the project. The statement covers built and/or cultural heritage, but not archaeology.

The planning submission, which comprises a listed building consent application, relates to the proposal to undertake essential structural repairs to the external wall and internal floor of the sitting room of Grade II listed Wonham Barton Farmhouse, following structural movement resulting from changing ground conditions.

The National Planning Policy Framework [NPPF], which since 2012 has incorporated the Government's heritage policy and is now in a fourth edition (published in July 2021), recognises that the historic environment is an irreplaceable resource whose fragile and finite nature is a particularly important consideration in planning. The Historic Environment Good Practice Advice in Planning: 2 (entitled 'Managing Significance in Decision-Taking in the Historic Environment' and published in July 2015), states:

*'Development proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect. The first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance.'* [HEGPA 2, paragraph 4]

It also notes in introduction that:

*'...the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or investigate the asset needs to be proportionate to the significance of the heritage assets affected and the impact on that significance'* [HEGPA 2, paragraph 3]

The Good Practice Advice advocates a logical step-by-step approach to dealing with heritage assets during the planning and design of development and subsequently in making a planning application – namely:

- *'Understand the significance of the affected assets*
- *Understand the impact of the proposal on that significance*

- *Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF*
- *Look for opportunities to better reveal or enhance significance*
- *Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change.*
- *Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.’ HEGPA 2, paragraph 6]*

This heritage statement has been prepared to fulfill this brief established by the NPPF and the Historic Environment Good Practice Advice in Planning: 2. It has also been prepared to accord with guidance set out in Historic England's 2019 Advice Note 12 'Statements of Heritage Significance: Analysing Significance in Heritage Assets'.

## 1.2 Methodology and sources of information

This statement has been based on:

- Site visits carried out by the author to the site and its wider environs in 2022 and 2023;
- Various original and modern documentary sources available for inspection in the Devon and Somerset Heritage Centres;
- Diverse published and unpublished evaluations of the local area and its historical associations;
- The local Historic Environment Record [HER];
- Historical documents available online;
- Other website information, including local newspapers and census information from [www.findmypast.com](http://www.findmypast.com) and material from a range of record sources made available on Bristol City Council's Know Your Place website, at [www.heritagegateway.org.uk](http://www.heritagegateway.org.uk), and from Historic England's National Heritage List for England;
- Historical maps and plans of the locality;
- Examination of national and local policy documents and other relevant material produced by Historic England and Mid Devon District Council.

## 2 DESCRIPTION AND DEVELOPMENT HISTORY OF THE APPLICATION SITE AND ITS WIDER ENVIRONS

### 2.1 Location and outline description

The application site [NGR: SS 92665 22080; Figures 1, 2, 3, 4, 5] comprises the historic farm complex of Wonham Barton. The farmstead lies immediately south of a lane running east from Oakford Bridge off the A396, approximately two miles due west of Bampton in Devon. It comprises a traditional farm complex with its Victorian farmhouse backed to its west by a courtyard of barns and agricultural outbuildings. The farmhouse is Grade II listed (although the formal map within the listing erroneously attributes the listing to Wonham Barton Cottage, which lies downslope to its south east) and three sides of the farm courtyard are separately listed, also at Grade II. Aside from the two listed buildings, the site does not carry any other statutory heritage designation.



FIGURE 1: LOCATION OF WONHAM BARTON (©BRISTOL CITY COUNCIL/KNOW YOUR PLACE - OS PMCL 100061638)

Locally, the ground slopes quite steeply down from north to south [Figures 2, 3] towards the Exe valley. According to the British Geological Society's Geology Viewer, the underlying bedrock comprises the Crackington Formation of mudstone, a sedimentary bedrock formed between 328 and 318 million years ago during the Carboniferous period. Other bands of mudstone and sandstone run close by to the south.





**FIGURE 2: DRONE VIEW LOOKING ACROSS THE FARMSTEAD FROM EAST TO WEST WITH THE LISTED FRAMHOUSE MIDDLE GROUND (©GTH)**



**FIGURE 3: DRONE VIEW OF THE LISTED FARMBUILDINGS AND FARMYARD FROM THE SOUTHEAST (©GTH)**





**FIGURE 4: VIEW LOOKING NORTH EAST ACROSS THE FARMYARD**



**FIGURE 5: VIEW ALONG THE LANE LOOKING WEST PAST THE FARMHOUSE AND SHIPPON**



## 2.2 Summary of historical development of the application site and its surrounding area



FIGURE 6: 1812 OLD SERIES OS MAP (©CASSINI MAPS; ORDNANCE SURVEY PMCL 100061726)

18<sup>th</sup> and 19<sup>th</sup> century maps demonstrate both the historic nature of the local road network that is seen today around Oakfordbridge and Wonham and its growth. Survey work for the local section of the Old Series OS map for Devon commenced in 1809 and continued for several years. The map [Figure 6], which was eventually made available to the public in 1817/18, shows how a new 1813-14 Dulverton to Tiverton turnpike road (whose route along the east bank of the River Exe had been planned by surveyor, John Coldridge, in 1812 (Devon Heritage Centre ref. QS/DP/22)), cut through the pre-existing networks of tracks, lanes, and roads, creating a wider, easier hill-free connection between the two main towns, as well as Bampton and lesser local settlements in between. The new route – upgrading an earlier turnpike between Luke Street, Bampton and Dulverton that had been started in 1766 – was heavily promoted by the Honorable Newton Fellowes of Eggesford, Devon, and MP for Andover, who had inherited the estates of his uncle, Henry Fellowes, in 1794, including land both in and to the west of Bampton up to the banks of the Exe.

Aside from the new road, the Old Series map depicts the general disposition of individual properties on Fellowes's land at Wonham in approximately 1810. It shows that, up to that time, no development of any significant scale had taken place on the south side of the old Oakfordbridge to Bampton road where Wonham Barton now stands, although a property known as Wonham Farm lay in a walled enclosure immediately across the road on its north side from a (perhaps very recently formed) 'junction' with the mouth of a path or track too minor otherwise to have been portrayed. The surveyor's depiction of terrain on the map illustrates the very considerable downward slope of the

ground from the southern edge of the lane. While the Old Series map is of small scale, its accuracy in terms of providing evidence of the location of buildings of substance, tracks, roads, and tree belts should not be doubted, for these first Ordnance Survey maps were prepared as a military precaution in case of the need to fight a 'guerrilla'-style defensive war in the event of Napoleonic invasion of the south coast. It is evident from the Old Series map that neither today's Wonham Barton nor any predecessor existed at the time. Instead, the dwellings at Wonham at the time comprised simply Wonham Farm and a cottage called Whites (now called Wonham Firs), while to the north lay a barn on the edge of rough land known descriptively in the following years as 'Coarse Ground'. The foregoing is confirmed by a notice published in the Taunton Courier on 19<sup>th</sup> August 1813, which offered the lease from Lady Day 1815 on '*the Barton and Farm called Wonham together with a tenement adjoining called Whites*'. Perhaps critically, the house (Wonham Farm) and yard at the heart of the farm – the barton - were described as being good but 'Improvable'. A further advertisement in the Exeter Flying Post reveals that the farm, now called Wonham Barton, was re-let in 1827.

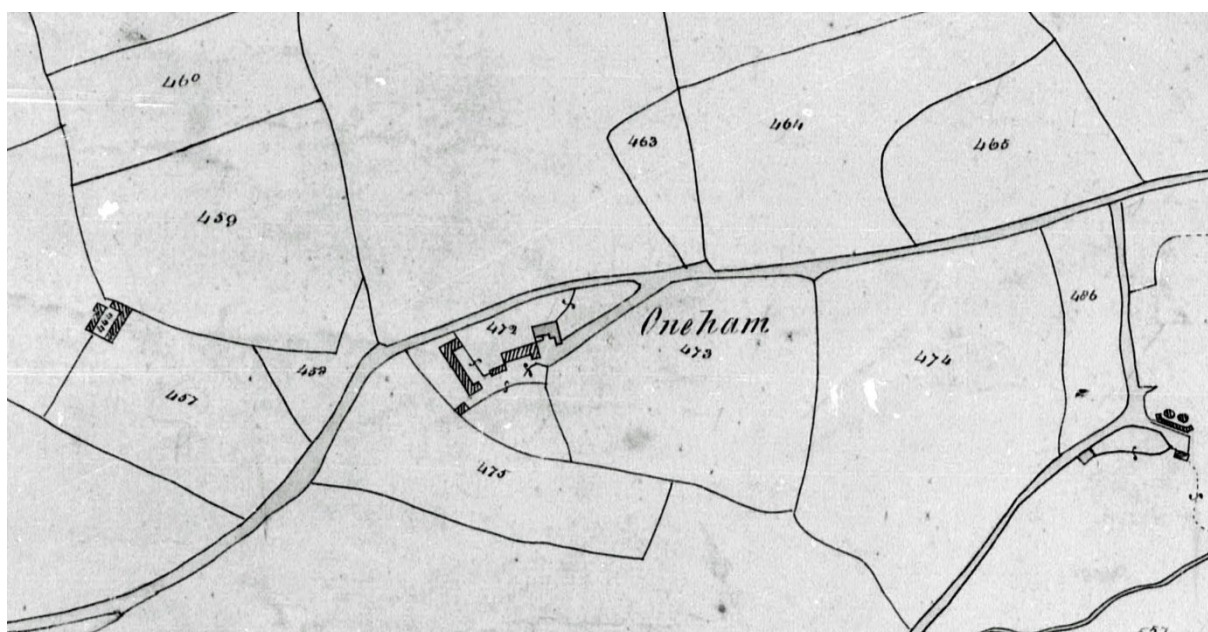


FIGURE 7: 1843 TITHE MAP (©THE GENEALOGIST/THE NATIONAL ARCHIVES; ORDNANCE SURVEY PMCL 100061726)

By 1841, the combined evidence from the decennial census of that year and the Bampton parish tithe map [Figure 7] and accompanying apportionment prepared in 1843 shows that three significant changes in the previous built form had taken place. On the north side of the lane, Wonham Farm and its walled enclosure had disappeared, while the mouth of the track directly opposite where it had stood had been extended across the slope to serve a property built in the intervening years called Wonham Barton (listed on the 1841 census as 'Oneham Barton' and on the 1843 map as 'Oneham'). Some way to the east lay another dwelling, Wonham(/Oneham) Kiln. The Barton was occupied by farmer George Morrish and his family (listed as Morris not Morrish on the tithe apportionment), with their four servants, while John Bristow, a lime burner, and his wife Mary lived at Wonham Kiln. Whites was occupied by two farm labourers. The estate was still owned by the Hon. Newton Fellowes.

Analysis of the tithe map reveals that the property then known as Wonham Barton was not the same as today's listed house of that name forming part of the current application site, but the adjacent

Wonham Barton Cottage to its immediate east. Barns and/or other agricultural buildings lay to the west of the then Barton, including an elongated structure on a north-south downhill axis cutting centrally across the position of today's courtyard and walled kitchen garden. The only access to the site was from the east along the previously mentioned track that spurred off the lane.

In May 1848, Fellowes sold off his Bampton land holdings, including the Manor of Bampton and the Wonham estate (Devon Heritage Centre ref. 62/9/2/Box1/43). It was purchased by John Collins, a Justice of the Peace previously living in Southernhay, Exeter, who had plans to reside at Wonham. This is confirmed in White's Directory of Devonshire for 1850 (page 322) which recorded in its overview of the town of Bampton that *'John Collins, Esq., who is about to erect a mansion at Wonham, is now lord of the Manor'*.

The next and most significant change for the site can be read between the 1851 decennial census return for Wonham and the 1880 1<sup>st</sup> Edition OS map. There are three noteworthy things about the census return for the Wonham estate taken on 30<sup>th</sup> March 1851. Firstly, Collins was by then resident at Wonham Barton (still being the current Wonham Barton Cottage rather than Wonham Barton itself), with servants and his farm bailiff living in the house as well. However, interestingly, there was also a visitor in the house that evening – a John Barrett, recorded as being an 'Excavator & Contractor'. The third item of interest requires an understanding of the process of census enumeration at the time. Each decade, on census night, the appointed enumerator was instructed to walk a predetermined and fixed route and to record the details of occupants at each property in strict order. From 1841-71, the route taken by the enumerator in this immediate area was the same (changing for 1881 following the construction, locally, of a number of new properties). In 1851, he walked from Duvale Barton along the bank of the River Exe to Chainbridge Lodge and then to the turnpike gate and lodge at Stuckeridge Bridge. Shortly afterwards, he turned uphill on a track leading to Wonham Kilns, before turning out onto the lane to walk westwards to Wonham Barton and finally Whites, before dropping down to the Exe again at Oakford Bridge. In 1851, between Wonham Kilns and Wonham Barton on this route, the census enumerator recorded (as he was required to do) an entry for 'House Building', which should be read as being a dwelling 'in building'. The only possible house in construction at the time physically located between Wonham Kilns and the then Wonham Barton was the latter's immediate neighbour today, the current application site now bearing the name Wonham Barton. Of course, no systems are ever safe against human error or disregard, yet it is the case that the 1841, 1861 and 1871 returns did all honour the correct order of buildings present at the time. However, it is equally possible that the 1851 census enumerator made an error in the order on his schedule and that the house in construction at the time was in fact Collins' intended new mansion for himself (Wonham House).

The interest in and relevance of the presence of excavator, John Barrett, at the property that evening in March 1851 is explained by the first illustration we have of the new Wonham Barton, which occurs almost 30 years later on the 1880 1<sup>st</sup> Edition OS map [Figures 8, 9] and shows that a radical reconfiguration of the site had taken place since the 1843 tithe map [Figure 7].



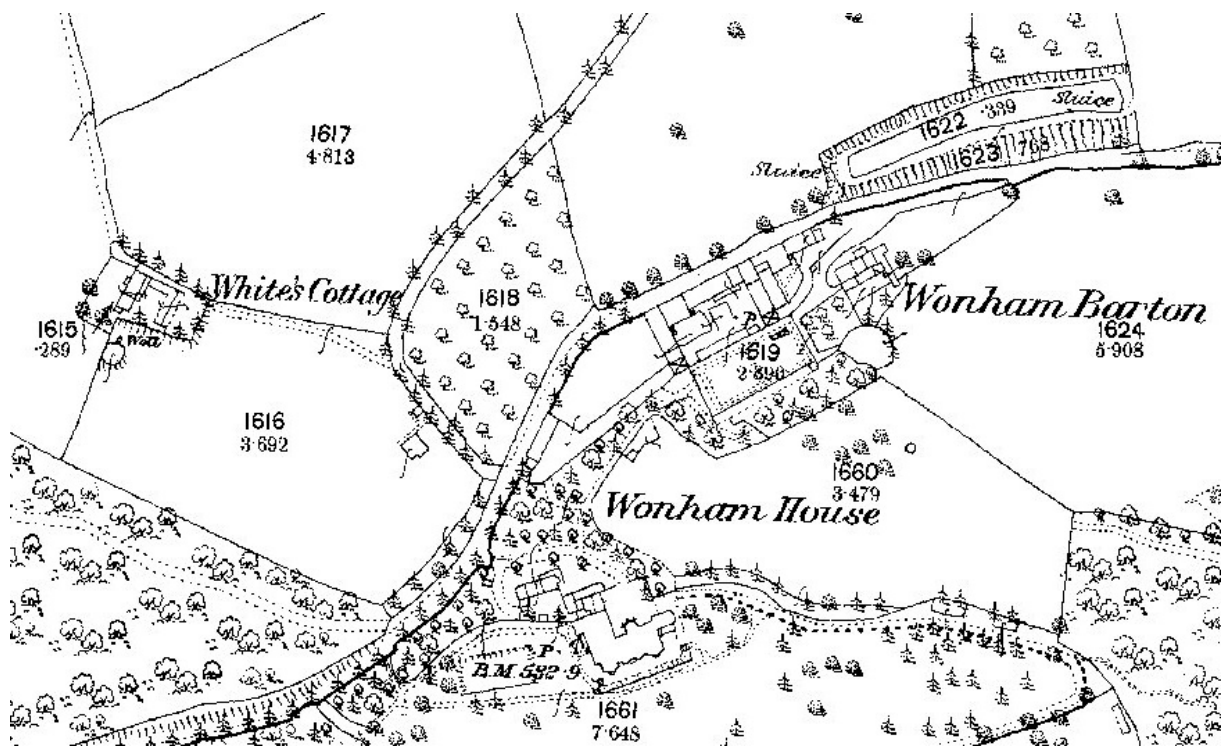


FIGURE 8: 1880 OS MAP SHOWING THE FARMHOUSE AND FARMWAYRD COMPLEX MUCH AS IT STANDS TODAY (©KNOWYOUR PLACE; ORDNANCE SURVEY PMCL 100061726)

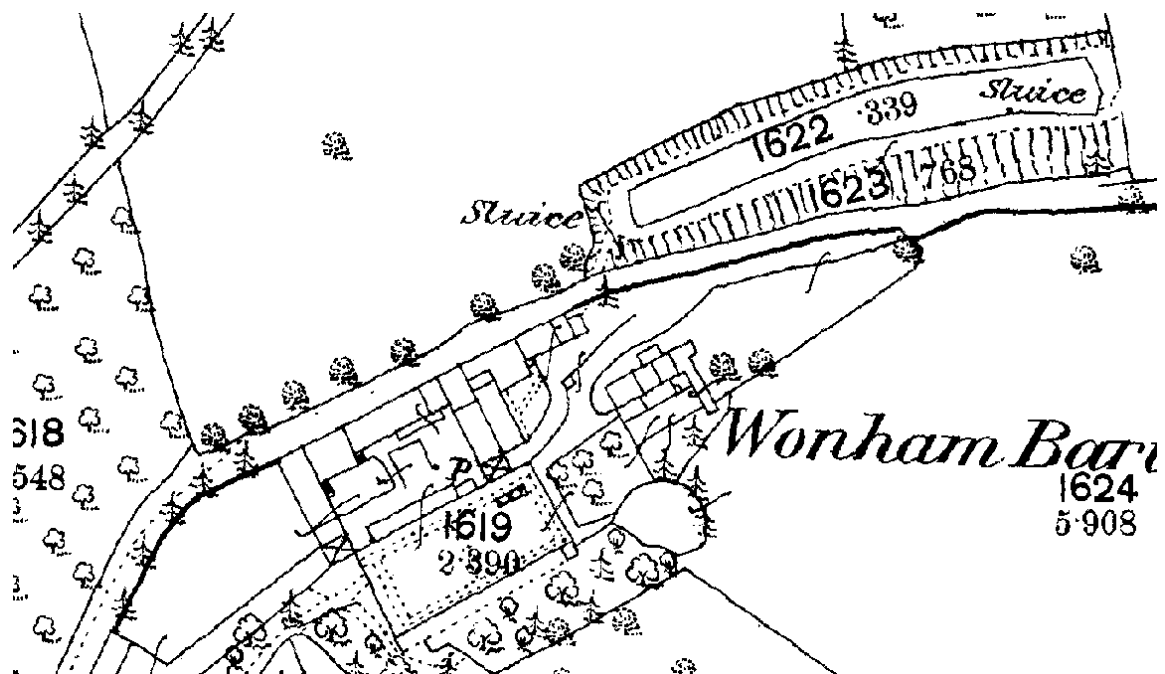


FIGURE 9: DETAIL OF WONHAM BARTON ON THE 1880 MAP (©KNOWYOUR PLACE; ORDNANCE SURVEY PMCL 100061726)

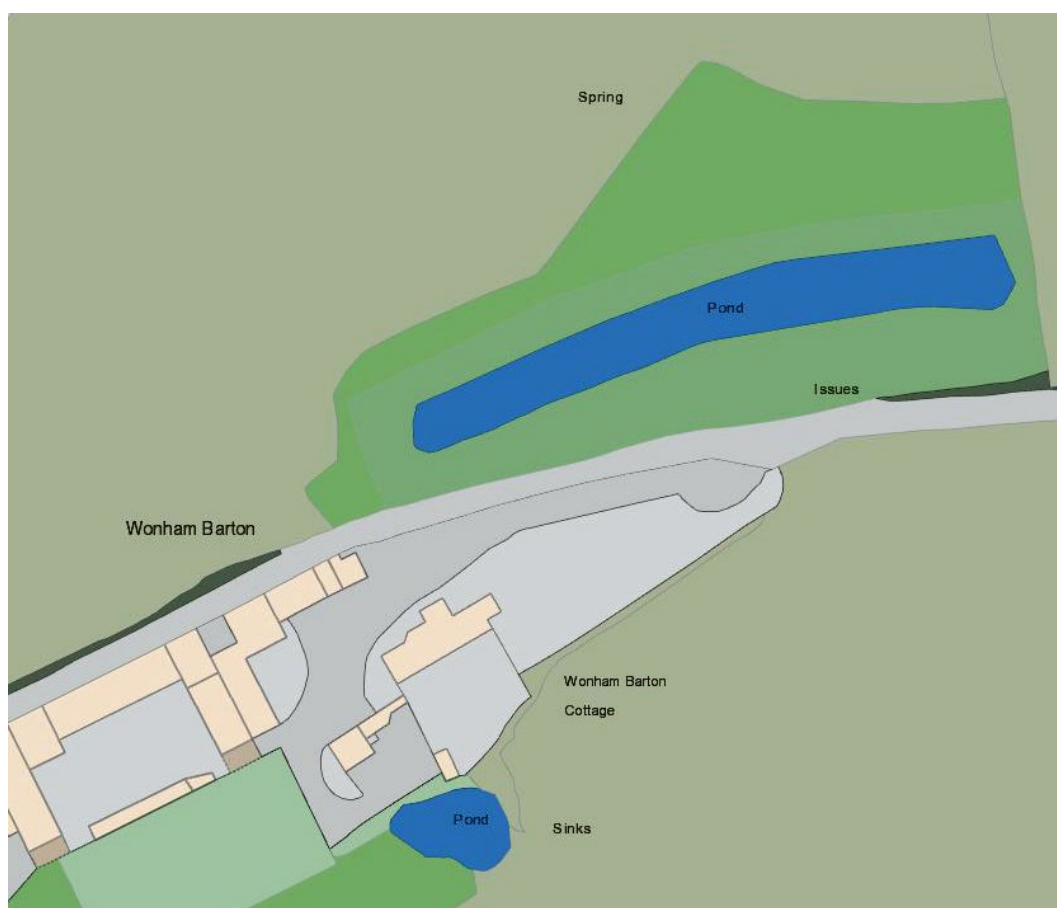
The layout of the new Wonham Barton will be described further below. At this juncture, it is the driving objective that is to be explored. The 1880 map (which through overlays can usefully be compared to the tithe map on the KnowYourPlace website) suggests that the house referred to as Oneham (Barton)

in the 1843 tithe documents still survived in 1880 - albeit marginally extended and subdivided into several cottages - but all the outbuildings/barns to its west [Figure 7] had been removed. Despite reasonable availability of land nearby on which to build afresh, it is noticeable the new Wonham Barton seen for the first time on the 1880 map had been squeezed upslope of the previous Oneham Barton into the restricted gap south of the edge of the lane, so that the repositioned, partly shared, vehicular access off the lane had to twist in a cramped manner around the old building to be able to run in front of the new house. Referring back to the Old Series map [Figure 6], it is evident that very significant groundworks had been undertaken to achieve this arrangement, transforming the steep uninterrupted downward slope from the edge of the lane in 1843 into a level platform on which the new house and farm complex could be built. This was a major task of excavation, requiring the construction of two tall and very long retaining walls – one at the edge of the lane and the other snaking round with the drive between the two houses [Figures 2, 3], dividing it into two separate tracks set at different levels – as well as the deepening and widening of parts of the foundations of the new house to take account of the depth of made up ground, for the creation of the level building platform between the two retaining walls involved not only extensive excavation, but also major redeposition of soil. Directly to the north of the lane at this very point, almost certainly contemporaneously a long mill pond was excavated (where the pre-1800 Wonham Farm once stood), providing another source of potential fill material for the new house platform. The foregoing explains the relevance of and passing interest in the presence of John Barrett, a stated excavation contractor, at Wonham Barton in March 1851 at the same time that a house – possibly the new Barton – was under construction.

This analysis begs a key question. Why would John Collins have invested so much in the major (and highly expensive) Barton project? Logically, the most likely answer must be that he desired his manorial estate to have a state-of-the-art ‘home farm’, capable of providing all the produce that might be required for his table and placed in convenient proximity to the site he had chosen for his own mansion, Wonham House. Such a model farm might be expected to incorporate a small water-powered corn mill to produce sufficient flour for his family’s and his workers’ needs at harvest time annually. The mill would require a reliable source of water and, preferably, as was the case with many historic mills, the freshly harvested wheat would be readily transferable from laden carts on the local lane directly into the upper level of a two storeyed mill, with the mill stones to grind the flour being located below. The 1880 OS map shows that that had been achieved. The excavation for the mill pond was carefully located to take advantage of a known spring and ‘issues’ [Figure 10]. The 1880 map shows that a sluice positioned at its western end fed into a stub leat that dived under the lane immediately at the eastern end of the new Barton’s built form, where the original wheel pit and water wheel appear to have been located. The logic of the illustrated layout [Figure 9] implies that the runoff away from the wheel pit passed through an underground conduit to the new pond created directly to the south and near to the old Barton (as noted already, by then converted into several cottages). The pond, which would have overflowed when the mill was in use at harvest time, had been dug immediately beside the location of a known ‘sink’, where a watercourse disappeared underground flowing towards the Exe.

Continuing with the theme of the new Wonham Barton representing for John Collins a model courtyard-style home farm, as the entry for the Barton on the Historic Environment Record [HER] notes, the 1880 map shows there were at most only two buildings outside the farm courtyard – the

most prominent being a cart linhay at the western entrance off the lane, with the other being a long range of open-fronted animal shelters to the south. This was a fully planned complex, including a new large rectangular walled kitchen garden, positioned to the south of the farm courtyard and the southern retaining wall. Noticeably, there is a path shown on the 1880 map running directly from the walled garden to Wonham House, presumably for the immediate supply of freshly picked produce, illustrating its importance to Collins and his family.



**FIGURE 10: 2019 MAP SHOWING SPRINGS, ISSUES AND SINKS IN RELATION TO WATER FEATURES AND THE EASTERN END OF THE BUILDINGS AT WONHAM BARTON (©KNOWYOUR PLACE; ORDNANCE SURVEY PMCL 100061726)**

On the 1861 decennial census, either the old or the new Wonham Barton is listed on the schedule as Wonham Farm, occupied by John Reynolds. If it is the new Wonham Barton, the old building is neither recorded as occupied nor vacant – evidence that leans back in favour of the 1851 house ‘in building’ as being Wonham House. Whichever was the case, the new Wonham Barton had been constructed before 1864 when Reynolds sold off his livestock and feed before ‘*quitting the farm*’ (Woolmer’s Exeter and Plymouth Gazette, 18<sup>th</sup> March 1864). The replacement tenancy was advertised in the Tiverton Gazette of 24<sup>th</sup> May that year as being of ‘*a newly-built and very convenient Farm House with first-class outbuildings, with a thrashing machine and wheel driven by water*’.

In summary, although the listing entries for both Grade II listed ‘Wonham Barton Farmhouse’ and the separately Grade II listed ‘3 Ranges of Farm Buildings’ to its rear indicate that they were constructed in c.1840, historical documentary evidence suggests that date is somewhat too early. There are



counter-indicators as to whether or not the Barton was in construction in 1851, or was built either prior to or after 1861, but it had certainly been completed in the manner described above by 1864.

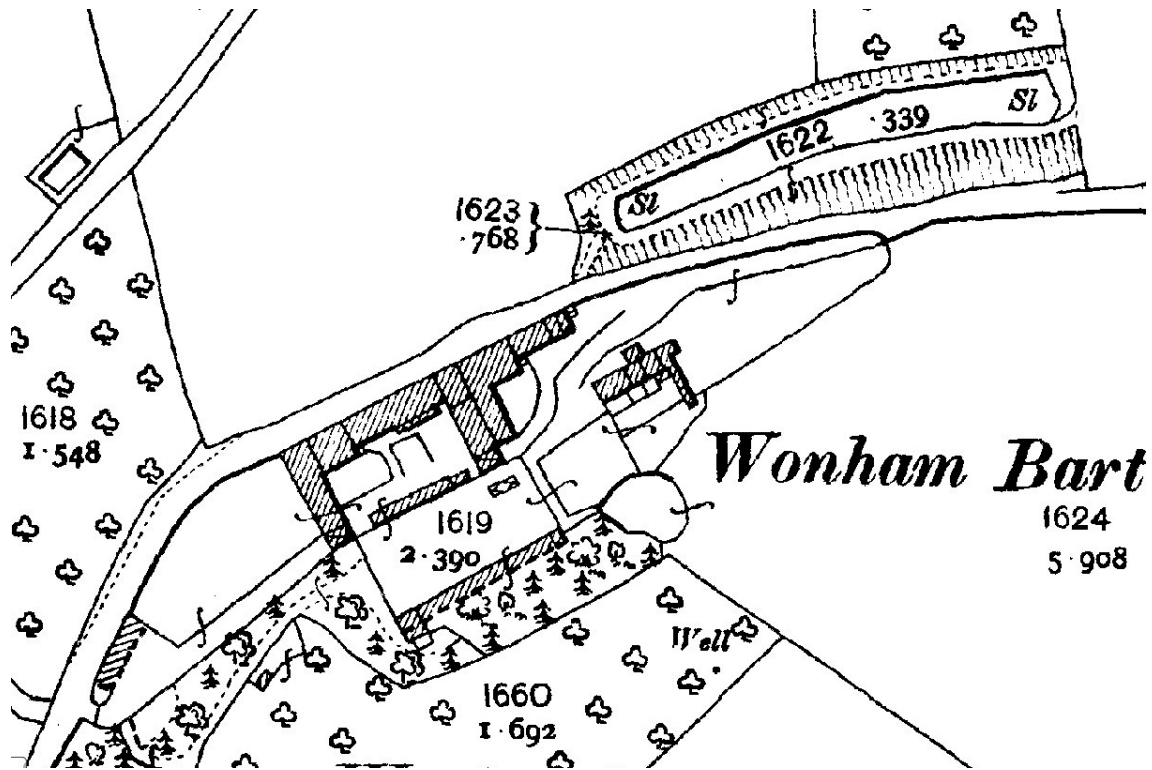


FIGURE 11: 1904 OS MAP (©KNOW YOUR PLACE; ORDNANCE SURVEY PMCL 100061726)

Very few changes appear to have been made to the complex between 1880 and 1904, when the 2<sup>nd</sup> Edition OS map [Figure 11] was published. At some time after that, almost certainly in the first decade of the 20<sup>th</sup> century, a large wheel pit and overshot waterwheel were added at the western end of the farm complex against the outer flank of the north-south aligned bank barn that forms the western side of the courtyard. The pit was and is large enough to have been included as a feature on the 1904 map and its absence there suggests the change of location had yet to be made. The repositioning of the wheel necessitated an inefficient rerouting of the underground conduit which served it with water from the mill pond. While the HER (see below) suggests that the pipe was routed under the lane, levels suggest this might have been difficult. A fairly faint line visible on a 1946 RAF aerial photograph [Figure 12] may be 'ghost' evidence of the line of the pipe and would have been a more sensible and achievable route than under the lane, but it could equally be one of several animal tracks cutting across the field to a gate. The wheelpit/waterwheel to the west of the bank barn can also be seen on this image.

The HER description of the western wheel and wheelpit (ref. MDV74844) reads:

*'The wheelpit took an overshot wheel between 24 and 30 feet in diameter but is now much silted up. The waterwheel was totally enclosed by a brick arch but this has now gone. Water from the millpond reached the wheel via a pipe or culvert under the lane.'*

A description of the historic farm courtyard written by architectural historian, Michael Laithwaite, in 1989 in a report entitled '*Devon Farmsteads. A Preliminary Survey*', cited within the HER, provides a good sense of its layout and use around say 1910:

*'The courtyard is fully built up on three sides with a bank barn...served by an underground waterwheel, granary and storage loft on the west and north sides above a stable and shippons. On the east side, parallel with the rear of the house, is a service range, probably designed for the salting house, dairy and wash house. At the east and west ends [are] covered cart entrances, only that on the east survives and on the north a row of loading hatches enabled the upper storeys to be serviced directly from the road, which lies at a higher level than the yard. On the south side of the yard is a...range, perhaps originally intended for pigs and in the centre is a rectangular dung pit.'*

The covered entrances to the courtyard at each end are interesting and original features that are clearly represented on the 1880 OS map [Figure 9], marked with a distinctive 'X' to symbolise a covered passageway. Only that at the eastern end survives today, although the western structure was still in place in 1946 [Figure 12]. The list entry for the farm buildings incorrectly considers the surviving eastern oversailing structure to be '*an early C20 weatherboarded extension*', while correctly noting it forms a '*throughway to [the] farmhouse*'.



FIGURE 12: 1946 RAF AERIAL PHOTOGRAPH (©KNOWYOUR PLACE; ORDNANCE SURVEY PMCL 100061726)

Site analysis supported by consideration and comparison of the snapshots in time presented by Figures 11 (1904), 12 (1946) and 13 (2006) reveal that – aside from the appearance of new buildings to the

west - some subtle changes occurred around the built complex over the 20<sup>th</sup> century after 1910. Nonetheless, as the list description for the complex notes, overall:

*'These buildings are an unusually good group, with the farmhouse. They have been little altered within, and are built against the road at the north side; this rear, north elevation, is an important aspect of the group. There is also a complex and sophisticated water supply and power system which formerly operated the wheel.'*

To the west of the planned model farmyard, a long narrow building was constructed parallel and close to the entrance track before WWII. The apparent relative freshness of its roof covering seen on the 1946 aerial photograph perhaps suggests it had been built in the 1930s. In turn, this building was redeveloped after WWII with a double spanned steel framed barn [Figure 13].

Based on a notice appearing in the Jewish Chronicle on 26<sup>th</sup> July 1940, the HER records that, during WWII, a school for Jewish boys, St. Mary's Lodge School, was evacuated from Bournemouth to Wonham Barton. It is not known for how long the school stayed at the farm, although subsequently it appears to have transferred to The Old House in Frog Street, Bampton.

In 1946, the former mill pond across the lane was overgrown and infilled with trees, although its profile and level change could still be detected from above and presumably seen from close quarters on the ground. By 1962, evidence of the pond is entirely missing from the newly-published OS map edition (not illustrated), with a bank of trees being the only remaining indication of its previous presence.



FIGURE 13: GOOGLE EARTH IMAGE FROM JUNE 2006 (©GOOGLE EARTH)



Other relatively minor, but still noteworthy changes in the postwar period included alterations to the eastern end of the north range (shippon) and at the junction with the east range and the rebuilding of the separate south range (piggery) – the latter leading to its exclusion from the Grade II listing of the complex.

Satellite images from December 2002 onwards consistently show the farmyard and surrounding buildings as empty or without signs of use [Figure 13]. It is understood that a handful of rooms in the listed farmhouse remained in residential use until c.2019.

## 3 THE IDENTIFICATION OF HERITAGE ASSETS BEING POTENTIAL RECEPTORS OF HERITAGE IMPACTS

### 3.1 Introduction

#### 3.1.1 Heritage assets and their level of significance

The NPPF defines a heritage asset as being ‘*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*’ and the significance of a heritage asset as being ‘*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*’.

The value of heritage assets can be expressed with regard to the component elements of heritage significance defined within Historic England’s ‘Conservation Principles’ (EH 2008), namely:

- **Evidential value**, which derives from the potential of a place to yield evidence about past human activity;
- **Historical value**, which derives from 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;
- **Aesthetic value**, which derives from the ways in which people draw sensory and intellectual stimulation from a place; and
- **Communal value**, which derives from the meanings of a place for the people who relate to it or for whom it figures in their collective experience and memory. These values are closely associated within historical and aesthetic values, but tend to have additional and specific aspects.

The NPPF similarly defines a set of four values that together may contribute towards the significance of a heritage asset – namely, architectural, archaeological, artistic, and historic interest. Although English Heritage (now Historic England) advised in 2008 (as above) that the significance of heritage assets should be expressed in terms of its four ‘packages’ of value (that is, evidential, historical, aesthetic, and communal values), in its 2019 Advice Note 12 ‘*Statements of Heritage Significance: Analysing Significance in Heritage Assets*’, Historic England [its page 16] has clarified and advised that, in setting out an assessment of significance for a heritage asset, heritage statements should:

*‘For each heritage asset, describe the various interests (see PPG paragraph: 006 reference ID: 18a-006-20190723):*

- Archaeological interest  
*There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*
- Architectural and artistic interest

*These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.*

- **Historic Interest**

*An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.*

*Having described the various interests, assess the level of the general significance of the heritage asset and the particular contribution to that significance of any features which would be affected by the proposal, or of its setting...’.*

Accordingly, that is the approach taken to assessing and describing significance in this heritage statement.

In order to quantify the relative significance of heritage assets in this statement – in other words, to provide a ‘hierarchy’ of significance – the following table has been adapted for this assessment from ICOMOS’s Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (ICOMOS 2011), to take into account the latest (2021) iteration of the NPPF. The ICOMOS guidance is intended as a robust and defensible system for assessing value and evaluating heritage impacts, for all kinds of built cultural property and not just that of World Heritage status in its own right.

Level of Significance	Criteria
Very high	World Heritage Sites;  Assets of acknowledged international importance;  Assets that can contribute significantly to acknowledged international research objectives;  Historic landscapes of international value (designated or not) and extremely well preserved historic landscapes with exceptional coherence, time depth, or other critical factor(s).
High	Scheduled Monuments and non-designated assets of Schedulable quality and importance;  Grade I and II* Listed buildings (Scotland category A);  Other Listed buildings that can be shown to have exceptional qualities in their fabric or associations not adequately reflected in their Listing grade;



Level of Significance	Criteria
	<p>Conservation Areas containing very important buildings;</p> <p>Non-designated structures of clear national importance;</p> <p>Designated and non-designated historic landscapes of outstanding historic interest (including Grade I and Grade II* Registered Parks and Gardens); undesigned landscapes of high quality and importance of demonstrable national value; and well preserved historic landscapes exhibiting considerable coherence, time depth or other critical factor(s);</p> <p>Assets that can contribute significantly to acknowledged national research objectives.</p>
Medium	<p>Designated or undesignated assets that contribute to regional research objectives;</p> <p>Grade II (Scotland category B) Listed buildings;</p> <p>Historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical association;</p> <p>Conservation Areas containing important buildings that contribute significantly to their historic character;</p> <p>Historic townscapes or built up areas with important historic integrity in their buildings, or built settings (for example including street furniture or other structures);</p> <p>Listed buildings not identified as of 'the highest significance' i.e. Grade II Listed buildings.</p> <p>Non-listed buildings of particular interest, particularly those highlighted as positive buildings or focal buildings in Conservation Area Appraisals</p> <p>Archaeological remains not of the 'highest significance' but with the potential to contribute distinctly to archaeological knowledge. Often remains associated with past types of activity identified in Regional Research Frameworks and the broader heritage community and academia as of particular interest or importance.</p> <p>Designated landscapes of special historic interest (including Grade II Registered Parks and Gardens); undesigned landscapes that would justify such a designation; averagely well preserved historic landscapes with reasonable coherence, time depth or other critical factor(s); landscapes of regional value.</p>

Level of Significance	Criteria
Low	<p>Designated and undesignated assets of local importance including those compromised by poor preservation and/or poor survival of contextual associations;</p> <p>Assets of limited value, but with potential to contribute to local research objectives;</p> <p>Locally Listed buildings (Scotland category C(S) Listed Buildings) and historic (unlisted) buildings of modest quality in their fabric or historical association;</p> <p>Archaeological remains which have a degree of significance meriting consideration in planning decisions, due to their heritage interest;</p> <p>Historic townscape or built-up areas of limited historic integrity in their buildings or built settings (for example including street furniture or other structures);</p> <p>Robust undesignated historic landscapes; historic landscapes with importance to local interest groups; and historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations.</p>
Negligible	<p>Archaeological remains which do not have a sufficient degree of interest to comprise 'heritage assets' or with very little surviving archaeological interest;</p> <p>Buildings of little architectural or historical note;</p> <p>Landscapes with little significant historical interest.</p>

Table 1: Levels of significance

Whilst, inevitably, some subjectivity is at times involved in making value judgements, this hierarchy of values has to be appreciated as a continuum and there may be 'shades' of interpretation where, for instance, an asset lies close to the borderline between the descriptions of 'high' and 'very high' significance.

### 3.1.2 The nature of heritage assets: designated and non-designated heritage assets

From a heritage perspective, built and other assets in the environment are either heritage assets or ordinary assets. Those that are classified as heritage assets may be designated (for example, a listed building or conservation area) or non-designated. The NPPF, which contains the Government's national heritage policy, defines 'designated' heritage assets (being World Heritage sites, scheduled monuments, listed buildings, protected wreck sites, registered parks and gardens, registered battlefields or conservation areas), but not non-designated heritage assets. However, in defining the

term ‘heritage asset’, it does by implication determine that those assets which are non-designated are ‘assets identified by the local planning authority (including local listing)’.

More helpfully, under the heading ‘What are non-designated heritage assets and how important are they?’, paragraphs 039 and 040 of the Ministry of Housing, Communities and Local Government’s 2021 ‘Planning Practice Guidance: Conserving and enhancing the historic environment’ states:

*‘Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets.’*

*A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets. [Paragraph 039]*

*There are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence. [Paragraph 040]’.*

### **3.1.3 The nature of settings to heritage assets**

The NPPF makes the point that significance (which it defines as ‘The value of a heritage asset to this and future generations because of its heritage interest’) derives ‘not only from a heritage asset’s physical presence, but also from its setting’. It defines the setting of a heritage asset as being:

*‘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.’*

In 2017, Historic England issued its revised guidance on ‘The Setting of Heritage Assets’ as Historic Environment Good Practice Advice in Planning: 3. Amongst other things, this advises that:

*‘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. 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 [NPPF glossary]. All of the following matters may affect the understanding or extent of setting:*

- *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; for instance, new understanding of the relationship between neighbouring heritage assets may extend what might previously have been understood to comprise setting.*

- *Extensive heritage assets, such as landscapes and townscapes, can include many heritage assets and their nested and overlapping settings, as well as having a setting of their own. A conservation area will include the settings of listed buildings and have its own setting, as will the village or urban area in which it is situated [explicitly recognised in green belt designations].*
- *The setting of a heritage asset may reflect the character of the wider townscape or landscape in which it is situated, or be quite distinct from it, whether fortuitously or by design [eg a quiet garden around a historic almshouse located within the bustle of the urban street-scene].*
- *Setting in urban areas, given the potential numbers and proximity of heritage assets, is therefore intimately linked to considerations of townscape and urban design and of the character and appearance of conservation areas. The character of the conservation area, and of the surrounding area, and the cumulative impact of proposed development adjacent, would suggest how much impact on the setting should be taken into account.*
- *[...]*
- *Setting is not a heritage asset, nor a heritage designation, though land within a setting may itself be designated. 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.'*

#### **3.1.4 Types of impacts**

The NPPF notes that harm can be caused to the significance of a heritage asset by its alteration or destruction, or from development within its setting. Put another way, impacts – whether beneficial or adverse – that might affect the significance of a heritage assets will either be:

- Direct physical impacts on its built fabric or character; or,
- Indirect impacts on the contribution made by its setting to its significance.

## **3.2 The identification of potential receptors of impacts from the development proposals**

### **3.2.1 Background to the identification of built/cultural heritage assets having the potential to receive impacts from the development**

As noted previously, the following assessment of potential receptors of impacts from the proposed development relates to built/cultural heritage assets only. Below ground and other archaeological assets are excluded from the assessment.

Paragraph 194 of the 2021 version of the NPPF demands that:



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

Moreover, as has already been explained, the Historic Environment Good Practice Advice in Planning: 2 reiterates this requirement in its advocated approach to dealing with heritage assets, which begins *'Understand the significance of the affected assets'*.

Accordingly, by extension, this heritage statement is required by this policy and associated guidance to identify:

- Designated heritage assets within or [if a designated area-wide asset] including the site, which might potentially receive direct impacts from the development proposals;
- Non-designated heritage assets within the site, which might potentially receive direct impacts from the proposals;
- Designated heritage assets beyond the boundaries of the site, whose settings might potentially receive indirect impacts from the proposals;
- Non-designated heritage assets beyond the boundaries of the site, whose settings might potentially receive indirect impacts from the proposals, leading to harm to significance of the heritage asset.

The next sections of the statement for the site identify the heritage assets that might fall into these four categories and which must therefore be considered to be potential receptors of impacts – whether direct or indirect - from the development.

## 3.3 Designated heritage assets within or including the application site

### 3.3.1 Introduction

The identification of designated heritage assets on or including the application site relies upon examination of the National Heritage List for England [NHLE] maintained by Historic England. The NHLE database is the *'official list of buildings, monuments, parks and gardens, wrecks, battlefields, World Heritage Sites and other heritage assets considered worthy of preservation'* and so provides information on the location of all designated heritage assets in England, with the exception of conservation areas (which are regarded as being the preserve of local planning authorities).

As noted already, the NHLE identifies Wonham Barton Farmhouse and separately '3 ranges of farm buildings forming farmyard to the rear of Wonham Barton Farmhouse' as being Grade II listed buildings that make up the farm complex. However, in this instance, the application site boundary is tightly drawn due to the nature of the proposals, and, aside from the farmhouse itself, there are no other designated heritage assets within or including the application site to be considered.

### 3.3.2 Wonham Barton Farmhouse

The farmhouse sits at the eastern end of the built farm complex. The list entry for the Grade II listed building, which was first designated in December 1987, reads:

*'Farmhouse. Circa 1840. Stone rubble, rendered on right gable end; tiled roof, gabled at ends ; 2 rear lateral stacks, 1 axial stack, end stack to wing. Plan: L plan. Single depth main range with 2 principal rooms and central entrance, front right return wing with separate entrance at the left end; the farmyard (q.v.) to the rear of the main range. Exterior: 2 storeys. 3-bay symmetrical front with Doric porch with slender columns; C19 4-panel front door with rectangular fanlight with diamond glazing bars ; fenestration of 12-pane sashes with segmental arches, the sash above the porch slightly smaller. The wing has a front door at the left with a flat porch canopy with a rectangular fanlight. 3-first floor 12-pane sashes, 1 ground floor C20 window in original embrasure. Interior: Not inspected.'*

As noted in section 2.1 above, the formal map within the list entry erroneously identifies the listing with Wonham Barton Cottage, downslope to the south east. The stated date of construction of the farmhouse in the list description has also been shown to be incorrect.

The history of development of the site, including the farmhouse, has been described already in section 2.2 and will not be repeated here. The farmhouse – the principal building within it – has special historical and architectural interest. Its significance lies in:

- Its distinctive built character, resulting from its traditional style and use of local materials;
- The retention of original internal joinery, fixtures, and fittings;
- Its role as the farmhouse standing alongside a distinctive planned mid 19<sup>th</sup> century model farm courtyard;
- Its group value with the separately listed farm buildings.

Using the hierarchy of significance provided in section 3.1.1, the Grade II listed Wonham Barton Farmhouse is considered to be a designated heritage asset of **medium significance**. Although not of relevance to this application, the contribution made by its farmstead and wider rural setting to this significance is substantial.

## 3.4 Non-designated heritage assets within or including the application site

Devon's Historic Environment Record and Mid Devon District Council's local list of heritage assets do not identify any 'locally important buildings' on the application site. On that basis, there are no non-designated heritage assets within or including the application site.

### 3.5 Designated heritage assets within the wider environs of the site

Again, the identification of designated heritage assets lying beyond the boundaries of the application site within its wider environs that might experience positive or negative impacts from the development proposals has relied in part upon examination of the NHLE, supplemented by map evidence confirming the location and boundaries of designated conservation areas locally and also by site inspection.

As noted previously, the NHLE search of the immediate area around the application site shows that a separate Grade II listed building – referred to as ‘3 ranges of farm buildings forming farmyard to the rear of Wonham Barton Farmhouse’ – constitutes an important part of the same farm complex. However, the nature and location of the proposals covered within this application is such that the contribution made by setting to the significance of the listed farm buildings cannot be impacted upon or harmed in any way by their implementation. In summary, there are no designated heritage assets in the wider environs of the site that are likely to receive impacts from the development proposals.

### 3.6 Non-designated heritage assets within the wider environs of the site

None. Again, the HER and the Council’s local list indicate there are no built or cultural non-designated heritage assets in the environs of the application site that need to be considered as potential receptors of heritage impacts from the proposed development. Site inspection confirms this.

## 4 HERITAGE LEGISLATION AND POLICY CONTEXT

### 4.1 National legislation and policy context

In England today, Government policy is framed around the principle that the care and conservation of individual heritage assets and the wider historic environment must involve:

*'Managing change...in ways that will best sustain...heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations'*

[English Heritage (2008) *Conservation Principles*]

Accordingly, in the Ministerial Foreword of the original edition of the NPPF, the Government stated that:

*'Sustainable development is about change for the better, and not only in our built environment. .... Our historic environment – buildings, landscapes, towns and villages – can better be cherished if their spirit of place thrives, rather than withers.'*

In terms of legislation, Section 66 of the Planning (Listed Buildings and Conservation Area Act) 1990 states that:

*'...in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority...shall have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses'.*

Section 72 of the same Act requires that requires that, in a conservation area, *'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'.*

The crucial point that is made forcefully in the NPPF [paragraphs 7-10] is that, to be sustainable, development must consider and involve the protection and enhancement of our natural, built and historic environment.

Of particular significance are Government policies for the historic environment set out in paragraphs 197-203 and 205-207 of the NPPF which variously require the local planning authority in determining applications for development to consider:

- *'The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and,*
- *The desirability of new development making a positive contribution to local character and distinctiveness [paragraph 197];*



while dictating that:

- *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 [paragraph 199];*
- *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 [paragraph 200];*
- *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...[paragraph 201];*
- *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 [paragraph 202];*
- *The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset [paragraph 203];*
- *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 [paragraph 207].*

## 4.2 Local policy context

In addition to these national policies, in terms of heritage, the Council's own policies within its 2013-2033 Local Plan (adopted in July 2020), contain a single specific 'umbrella' policy for conservation and the historic environment (Policy DM25), requiring that:

***'Policy DM25: Development affecting heritage assets***

*Heritage assets and their settings are an irreplaceable resource. Accordingly the Council will:*

- a) Apply a presumption in favour of preserving or enhancing all designated heritage assets and their settings;*
- b) Require development proposals likely to affect the significance of heritage assets, including new buildings, alterations, extensions, changes of use and demolitions, to consider their significance, character, setting (including views to or from), appearance, design, layout and local distinctiveness, and the opportunities to enhance them;*
- c) Only approve proposals that would lead to substantial harm or total loss of significance of a designated heritage asset where it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss or the requirements of the National Planning Policy Framework are met;*
- d) Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use; and*
- e) Require developers to make a proportionate but systematic assessment of any impact on the setting and thereby the significance of heritage asset(s)*

## 5 ASSESSMENT OF POTENTIAL IMPACTS

### 5.1 Introduction and general observations

As has been noted at the start of this statement, it has been prepared to comply with paragraph 194 of the NPPF, which requires an applicant whose proposals may affect one or more heritage assets ‘to describe the significance of any heritage assets affected, including any contribution made by their setting’ to a level of detail that is ‘sufficient to understand the potential impact of the proposal on their significance’. This concluding section of the statement reviews likely impacts from the development proposals on relevant heritage assets in the light of the foregoing analysis and findings.

It has already been mentioned in section 3.1.4 that impacts – whether beneficial or adverse – that might affect the significance of a heritage asset will either be:

- Direct physical impacts on its built fabric or character; or,
- Indirect impacts on the contribution made by its setting to its significance.

Finally, as a general principle, in NPPF terms, adverse effects resulting from any development proposal – that is, harm - can be considered to be a continuum, with ‘substantial harm’ only occurring at its very highest end and ‘less than substantial’ harm occupying the whole of the remainder of the continuum from the most minimal harm through to the threshold with ‘substantial harm’ where significance is almost completely vitiated.

### 5.2 Potential receptors of impacts

The heritage assets that may be affected by the development proposal have been identified in section 3 of this heritage statement as being:

#### *Designated heritage assets within or including the site*

- i) Wonham Barton Farmhouse

#### *Non-designated heritage assets within or including the site*

- None

#### *Designated assets within the wider environs of the site*

- None

#### *Non-designated assets within the wider environs of the site*

- None

The Grade II listed Wonham Barton Farmhouse is considered to be the only potential built/cultural heritage receptor of impacts from the proposals for the application site.

## 5.3 Assessment of potential heritage impacts

### 5.3.1 Introduction

In section 5.1 above, it is mentioned that the assessment of harm caused to the significance of heritage assets in this statement would be based on the notion that harm can be seen as a continuum, with substantial harm only occurring at its very highest end and less than substantial harm occupying the whole of the remainder. This approach derives from the principles set down as national policy in the NPPF.

The NPPF's approach to negative impacts on designated heritage assets (referred to as 'harm') revolves around an undefined threshold between 'substantial' and 'less than substantial' harm. Although the term 'substantial harm' is neither defined in the NPPF nor in related guidance, the Planning Practice Guidance (2021) for Conserving and Enhancing the Historic Environment advises:

*'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 setting.'*

*'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.'*

This carefully worded guidance reflects in part the principal case law to date that touched upon the definition of substantial harm (*Bedford Borough Council v Secretary of State for Communities and Local Government*, 2013). This related to a judicial review of a planning appeal. Accordingly, its findings in terms of an absolute definition are to a degree ambiguous, as that was not the issue at hand. The case was about process, not fact. However, the judgement is of importance for the light it sheds on an acceptable approach to defining 'substantial harm', which was summed up as follows:

*'What the inspector was saying was that for harm to be substantial, the impact on significance was required to be serious such that very much, if not all, of the significance was drained away.'*

*'Plainly in the context of physical harm, this would apply in the case of demolition or destruction, being a case of total loss. It would also apply to a case of serious damage to the structure of the'*



*building. In the context of non-physical or indirect harm, the yardstick was effectively the same. One was looking for an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced.'*

Since then, relevant case law has focused to a large part on addressing the matter of achieving an appropriate balance between competing interests in circumstances where the level of harm to the significance of a heritage asset is likely to be less than substantial. In the *Barnwell Manor* case [SDDC CD17 *Barnwell Manor Wind Energy Ltd v. East Northamptonshire District Council* [2014] EWCA 137] it was found that '*less than substantial harm does not equate to a less than substantial planning objection*'. The judgement emphasised the need to have special regard to impacts on the setting of designated heritage assets and that '*there is a need to give considerable importance and weight to any harm...when carrying out the planning balance*'.

Also in 2014, the *Forge Field* ruling [R (*Forge Field Society*) v *Sevenoaks District Council & Others* [2014] EWHC 1895 (Admin)] reiterated *Barnwell Manor*'s approach, finding that the statutory duty imposed under section 66 of the Listed Buildings and Conservation Areas Act 1990 to have special regard to the desirability of preserving listed buildings and their settings requires that considerable weight must be accorded to any harm to listed buildings or their settings. The judgement concluded:

*'The presumption is a statutory one. It is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. But an authority can only properly strike the right balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation...'*

As *Forge Field* noted, despite this statutory presumption, there is a balance to be considered. In the *Razor's Farm* recovered appeal decision in September 2014 [APP/H1705/A/13/2205929], alluding to *Barnwell Manor*, the Secretary of State noted that '*an adverse impact [on significance]...is one factor that attracts considerable importance and weight in the balancing exercise. However, it is important to acknowledge that considerable importance and weight is not synonymous with overriding importance and weight*'.

Based on the foregoing, diagrammatically, the sliding scale of harm can be illustrated as shown in Figure 14.

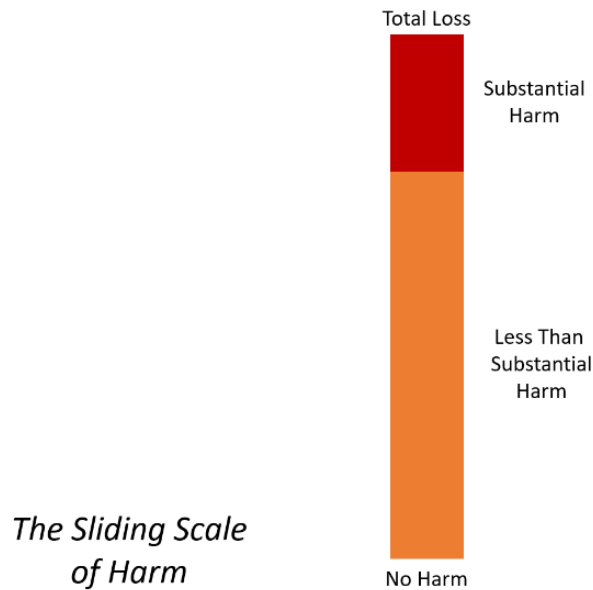


FIGURE 14: ILLUSTRATION OF THE CONCEPT OF HARM BEING A SLIDING SCALE WITH A THRESHOLD AT HIGH LEVEL ALONG THE SCALE BETWEEN THE NPPF CATEGORIES OF 'LESS THAN SUBSTANTIAL HARM' AND 'SUBSTANTIAL HARM'

In this statement, in reaching an assessment on any harm, the 'less than substantial' continuum/sliding scale will be subdivided into notional bands of harm – starting at the lower end with 'minor' harm, then 'moderate', and finally 'major', before reaching the upper threshold with 'substantial harm' – each band still being a gradient and with no hard dividing lines between them.

### 5.3.2 Summary of the development proposals

Earlier in this heritage statement (section 2.2; page 11), it was explained that, in constructing the farmhouse at Wonham Barton prior to 1864:

*'...very significant groundworks had [to be] undertaken, transforming the steep uninterrupted downward slope from the edge of the lane in 1843 into a level platform on which the new house and farm complex could be built. This was a major task of excavation, requiring the construction of two tall and very long retaining walls – one at the edge of the lane and the other snaking round with the drive between the two houses, dividing it into two separate tracks set at different levels – as well as the deepening and widening of parts of the foundations of the new house to take account of the depth of made up ground, for the creation of the level building platform between the two retaining walls involved not only extensive excavation, but also major redeposition of soil'.*

The sitting room within the listed building is located at its southernmost end, where the greatest degree of such soil deposition was required to create the level building platform. In the structural statement prepared by Sands Consultants that forms part of the application, it is advised that:

*'The [sitting room] gable end of the building has suffered with subsidence, and it appears that the corner of the building has settled. This settlement has resulted in multiple cracks in the stone,*

*internally and externally in both the gable and front elevation. A majority of the cracking is of structural concern as it has resulted in building in the wall, dropped lintels and open joints in the face of the wall.*

*The cause of the subsidence appears to be related to a leaking drain running adjacent to the gable wall.*

*As part of the of the investigative work, excavations were carried out to determine the depth of the foundations, however, after excavating over 2m deep, the foundations were not encountered.*

*It is very probable that since the natural profile and slope of the ground falls steeply away that the ground levels have been built up around the gable end of the house. This would also explain the very tall retaining wall on the boundary of the site.*

*It is likely that the foundations were formed at a depth of circa 3m, (below existing ground) and then the ground levels made up with site won stone / earth material.*

*This made-up ground could have washed out / settled / compacted from the leaking drain. The drain has been repaired, and the ground has since re-formed into a firm stratum.'*

The design and access statement (DAS) within the application explains that the proposals for essential structural repair to prevent this damage reoccurring comprise two elements:

#### *'External Walls*

*Given the construction of the existing external walls it is not practical to remove stone work and rebuild. It is therefore proposed to crack stitch repair the walls, using stainless steel helical bar. Detailed proposals and method statement as prepared by Target Solutions are submitted in support of the application.*

*On completion of the structural repair works, all walls as indicated on the submitted drawings are to be externally repointed using lime mortar.*

#### *Internal Floor*

*The void beneath the existing floor needs to be back filled and the floor reinstated. However, there is a concern that due to the volume of stone required, it will compact over time, and the floor will once again fall out of level. The project engineer's structural recommendation, to minimise the risk of future ground settlement and the floors falling back out of level, is to introduce a new reinforced concrete slab over the entire area of the living room. This will create a 'raft' which can span or cantilevering over softer areas of ground. A new damp proof membrane, insulation and screed is to be installed over the new concrete slab.'*

### 5.3.3 Assessment of heritage impacts on the significance of Wonham Barton Farmhouse

Grade II listed Wonham Barton Farmhouse has been described in section 3.3.2 of this statement, where its significance and the contribution made to significance by its setting have been assessed. The conclusion of that assessment is that the listed building is of medium.

The proposals within the application have been summarised in section 5.3.2 above and are set out in greater detail in the drawings, DAS, and other technical documentation within the submission. As noted, the proposed works comprise two related, but distinct, elements and these have been assessed separately for their potential effects on the significance of the listed building.

#### *Stitch repairs to external walls and related works*

The proposed repair and strengthening works to the external walls have been developed iteratively with heritage input to mitigate heritage impacts as far as can be achieved, while delivering an effective outcome from the works. The use of stitch repairs involving insertion of steel helical bars into historic stone walls is a tried and tested solution that is regarded as being good conservation practice and helps secure minimum intervention with and loss of important historic fabric. The extent of interventions has been limited through the iterative design process.

It is considered that the proposed works will help to safeguard the significance of the listed building and, as noted, represent the minimum intervention required to protect its structure and fabric from further structural movement.

On that basis, it is assessed that the works will have a minor beneficial effect on the significance of the listed building and its retention.

#### *Replacement of the sitting room floor*

The need for removal of the original historic suspended timber floor in the sitting room and its replacement with a reinforced concrete slab has been discussed in terms of heritage impacts at some length during design of the proposals. The design of the existing floor is shown within the application, as is the intended replacement.

The advice provided by the project engineer on the risks of future ground settlement occurring and the floors falling back out of level is regarded as being sound. The existing floor, whilst traditional in character, is modest in form and does not contribute meaningfully to the overall medium significance of the listed farmhouse. The same can be said for the internal finishes within the sitting room, generally. Heritage input during the design process has stressed the need to isolate the surrounding historic fabric from concrete in order to allow removal in the future without damaging or losing further historic fabric.

On balance, it is considered that the replacement of the floor in the way proposed is an important safeguard for the historic building and for protection of its significance. It is assessed that this element of the proposals will result in no effect on the significance of the listed farmhouse.



## Summary

Pulling these impact assessments together, it is considered that the proposals within the application will result in no harm being to the significance of the listed building and arguably a degree of minor beneficial effect on its ongoing retention and protection.

## 5.4 Findings from the heritage impact assessment

Section 66 of the Planning (Listed Buildings and Conservation Areas) 1990 Act states that:

*'...in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority...shall have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses'.*

Paragraph 199 of the NPPF instructs local planning authorities that *'great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)'*, while the following paragraph requires that *'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'.*

In this instance, the proposed works in the application have been planned and designed specifically in order to preserve the listed Wonham Barton Farmhouse and its significance. While intervention with the existing surviving historic fabric is essential in order to implement the works, the extent of intervention and loss of historic fabric have been carefully minimized in order to protect its architectural and historic interest. It is considered that no harm will result from the proposals to the listed building's significance.

Accordingly, it is contended that the application complies with the intent of Section 66 of the 1990 Act and with national heritage policy regarding harm in the NPPF. Similarly, at a local level, the proposals in the application pass the tests relating to development affecting the historic environment set by Mid Devon District Council's Local Plan policies, including the specific historic environment policy DM25.

The development proposals in the application thus pass the key national legislation and national and local heritage policy tests.

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