Heritage Statements and **Heritage Impact Assessments**

The Heritage Statement or Heritage Impact Assessment is to ensure that the heritage asset(s) that are or have the potential to be affected by the proposals and their setting are identified.

The Heritage Statement/Impact Assessment should identify all heritage assets potentially affected and their settings; Specifically, it must describe their significance; and assess the potential impact of the proposal on that significance, including direct physical change and change to their setting.

Heritage assets include designated and non-designated assets, as well as both buildings and below ground archaeology.

In some cases, it will be necessary to use appropriate expertise to undertake the Heritage Impact Assessment.

The NPPF and PPG include a Glossary and explanation of terms, such as 'heritage asset', 'setting' and 'significance':

Heritage asset: 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. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

Setting of a heritage asset: 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.

Significance (for heritage policy): 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.

(NPPF Annex 2: Glossary)

For applications affecting a heritage asset such as a World Heritage Site, Conservation Area or Listed Building a Heritage Statement or Heritage Impact Assessment will be required. The level of information required will depend on the scale and nature of the development. The statement should consider and describe the Heritage Asset and demonstrate that the asset has been assessed and understood. As a minimum, the Historic Environmental Record (HER) should have been consulted.

National Planning Policy Framework (NPPF)

The National Planning Policy Framework (Department for Communities and Local Government, March 2012) Section 194 states 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. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation

National Planning Policy Framework:

National Planning Policy Framework - GOV.UK (www.gov.uk)

Heritage Statement and Impact Assessment

SITE NAME

ADDRESS OF SITE (INCLUDING POSTCODE)

GRID REFERENCE

1. What heritage asset(s), including their setting, are potentially affected by the proposals? (Please tick the relevant boxes below)

1. Scheduled Monument (SM)	
2. World Heritage Site (WHS)	
3. Listed Building (LB)	
4. Conservation Area (CA)	
5. Registered Park and Garden (RPG)	
6. Historic Battlefield (HB)	
7. Locally Listed Heritage Asset (LLHA)	
8. Archaeological Notification Area (ANA)	
Other Non-Designated Heritage Asset (including below ground	
archaeology)	

2. Proposed Works

Please state the type of proposal e.g. extension to a listed building, internal alterations

Please list the works proposed including specific materials e.g. replacement single glazed timber windows, reroofing, removal of internal wall, reinstatement of original staircase, damp proofing works to basement etc.

3. Pre Application Advice

Have v	ou souaht pr	re-application	heritage advice	e from the	relevant local	planning	ı authority	/?
,		o application	montage darie		101010111110001	P 1 Ca 1 1 1 1 1 1 1 9	,	•

Yes No

If Yes, please provide a copy of any written correspondence with reference number/contact name if applicable.

Have you sought pre-application heritage advice from Historic England?

Yes No

If Yes, please provide a copy of any written correspondence with reference number/contact name if applicable.

Information Classification: CONTROLLED

4. What is known about the affected heritage asset(s)

Using the information obtained through research and on-site analysis provide a summary of the history of the site/building.

Please add a summary history of the site/building including specifically the parts that will be impacted by the proposals – e.g. how the site/building was originally laid out, how it has evolved, phases of construction and/or change Please also provide information on past impacts – e.g. modern extension, drainage, former footings, recent landscaping, gardening. Please add any research material as an appendix to this report.

5. What is important about the affected heritage asset(s) ('the significance')?

Use this space to describe the significance of the heritage asset(s) and their setting (including below ground archaeology) identified in Section 3. Please see the guidance under 'further information' on page 1 on what a heritage asset is and how to define significance.

(Please continue on separate sheet of paper if further space is required and attach as an appendix to this report)

6. How will the proposals impact on the significance of the heritage asset(s) and their setting?

Please identify and explain what impact the proposals have on the heritage asset(s) i.e. loss or disturbance of historic building fabric, below or above ground archaeological impacts, setting or change of relationship between buildings and altering scale. (Please continue on separate sheet of paper if further space is required and attach as an appendix to this report).

7. How has the proposal been designed to conserve the significance of the heritage asset(s) and their setting?

Describe how the proposal has been designed to conserve and enhance the significance of the heritage assets (including below ground archaeology). Also describe how any harmful impacts have been avoided or minimized. For example, use of raft foundations, movement of the proposed extension to a less sensitive location.

(Please continue on separate sheet of paper if further space is required and attach as an appendix to this report.)

Contact Details:

Historic England: www.historicengland.org.uk

Local Planning Authority:

Cornwall Council: https://www.cornwall.gov.uk/

Cornwall Council Planning Pages: https://www.cornwall.gov.uk/planning-and-building-control/

Appendix

5. Significance of Affected Heritage Asset(s)

Geological Significance - Cligga Head SSSI:

Cligga Head's designation as a Site of Special Scientific Interest (SSSI) is rooted in its unique geological characteristics. The site exhibits rare greisened granite formations and a variety of minerals, making it a key location for geological research and education. These geological features represent significant natural history and contribute to our understanding of the region's geological evolution.

Archaeological Significance - Historical Context:

The proposed development area, encompassing part of the Perranporth Airfield and adjacent to the Cligga Head SSSI, is steeped in rich historical layers. The airfield's role as part of RAF Perranporth during World War II adds significant wartime historical value.

The proximity to the St Agnes Mining District, part of the Cornish Mining World Heritage Site, highlights the area's importance in the context of Cornwall's extensive mining history. This historical significance is further emphasized by the presence of post-medieval mining activity and remnants in the vicinity.

The assessment notes the presence of prehistoric barrows south of the site, indicating an ancient historical presence and suggesting potential below-ground archaeological deposits related to various historical periods, including mining and wartime activities.

Ecological Value:

The ecological significance of Cligga Head SSSI extends to its maritime heathland and grassland, encompassing a rich biodiversity that is indicative of the local maritime climate and geological conditions. This biodiversity is crucial for ecological study, conservation, and understanding the interaction between geology and flora/fauna in this unique coastal environment.

Overall Importance:

The Cligga Head area, including the airfield and adjacent land, is a heritage asset of considerable significance due to its unique combination of geological, archaeological, and ecological values. These assets provide valuable insights into natural history, human activity over various historical periods, and ecological diversity. The site's historical depth, ranging from prehistoric times through post-medieval and modern eras, adds to its cultural and educational importance.

Appendix

6. How will the proposals impact on the significance of the heritage asset(s) and their setting?

Archaeological and Historical Impact:

- The installation of new antennas and cabling, primarily within the Cligga Head SSSI, may intersect with unidentified archaeological features, given the site's history of post-medieval mining. This could potentially disturb subsurface archaeological deposits, though extensive efforts have been made to minimize such impacts.

Geological Impact:

- The physical presence of new installations, even when minimally intrusive, introduces new elements into the geological landscape of the Cligga Head SSSI. While temporary, these additions represent a change, albeit slight, in the current geological setting.

Visual and Environmental Impact:

- The project will slightly alter the visual landscape and setting of the heritage site due to the introduction of antenna structures and surface-laid cabling. While designed to be unobtrusive, these changes are deviations from the site's current visual character.

Ecological Considerations:

- Despite measures to minimize ecological disruption, any ground disturbance within the SSSI, even when minimal, could potentially impact the delicate ecological balance of the area, particularly the heathland and grassland habitats.

Overall Assessment:

- While the proposed development has been planned with a focus on minimizing impact, the introduction of new structures and potential ground disturbances will have some level of temporary impact on the heritage assets, including archaeological, geological, ecological, and visual aspects of the site. These impacts are expected to be minor and managed through careful implementation of the project.

Appendix

7. How has the proposal been designed to conserve the significance of the heritage asset(s) and their setting?

Conservation-Oriented Design:

The proposal incorporates specific design choices to conserve the significance of the heritage assets, particularly within the Cligga Head SSSI and the surrounding archaeological context. These include the careful placement of new installations and the use of non-intrusive methods for their setup.

Minimization of Archaeological Impact:

Measures such as the relocation of RX antennae and the use of the existing electric trench placements have been planned to avoid disturbing known archaeological sites. The implementation of an archaeological watching brief ensures that any potential impacts on unidentified archaeological deposits are identified and managed appropriately.

Biodiversity and Ecological Conservation:

Adhering to Natural England's conditions, the proposal includes using existing posts for antenna installation, avoiding heavy machinery within the SSSI, and ensuring minimal ground disturbance. This approach aims to protect the site's biodiversity and ecological features.

Visual Impact and Preservation of Setting:

The use of colours and materials that blend with the natural surroundings, along with the strategic placement of equipment, is intended to preserve the visual character of the heritage setting. This includes the use of drab green or grey for temporary structures to reduce visual intrusion.

Reversibility and Temporary Nature:

A key aspect of the design is the temporary and reversible nature of the installations. The commitment to remove all equipment and infrastructure at the end of the project ensures that any changes to the site are not permanent, thereby preserving the long-term integrity of the heritage assets.

Overall Approach:

The proposal has been thoughtfully designed to respect and preserve the heritage significance of the site, with a focus on reversible and non-intrusive methods. These measures collectively aim to conserve both the tangible and intangible values of the heritage assets, ensuring that their historical, archaeological, and ecological importance is maintained for future generations.

Perranporth Airfield

Perranzabuloe, Cornwall Archaeological Assessment

Author: Matt Mossop MA, MGSDip MIAI

Date: August 2010



ALC P

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This study was commissioned by Daniel Conley on behalf of The University of Plymouth and carried out by Archaeological Consultancy Ltd (AC). The fieldwork was undertaken by the author, assisted by Hayley Goacher and Dan Billing (AC) and James Dean.

The desk-based research was undertaken by the author and Dan Billing, with help kindly provided by Bryn Perry Tapper (Sites and Monuments Records, Historic Environment (HE)), Linda Wyatt (Aerial Photographs), David Thomas at the Cornwall Record Office (CRO) at Cornwall Council (CC); Angela Broome at the Courtney Library (CL); Bob Andrew (Secretary Cornwall aviation Society), Frank Tyrer (Former mechanic with 145 wing Free French Mobile Airfield, stationed at RAF Perranporth) and Lauren Woodard (RAF Museum).

The views and recommendations expressed in this report are those of Archaeological Consultancy Ltd and are presented in good faith on the basis of professional judgement and on information currently available.

Cover illustration

Perranporth Airfield Night Shelter looking west



Perranporth Airfield

Perranzabuloe, Cornwall. Archaeological Assessment

Author: Matt Mossop MA, MGSDip MIAI

Report Date: August 2010

Client: University of Plymouth

Proposal: Temporary radar installation

National Grid Reference: SW 74090 53220

Civil Parish: Perranzabuloe

District: Central 1

County: Cornwall

Project Dates: August 2010

Licence/Accession No: N/A

Project No: AC10007E

Planning Reference: Pre-Planning

Statutory Protection: World Heritage Site

Scheduled Monument 32957



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Abbrevia	tions	
AC	Archaeological Consultancy Ltd	
BGS	British Geological Society	
CAU	Cornwall Archaeological Unit (now the HES)	
CCC	Cornwall County Council	
CRO	Cornwall Record Office	
EH	English Heritage	
HER	Cornwall and the Isles of Scilly Historic Environment Record	
HES	Historic Environment Service, Cornwall County Council	
NGR	National Grid Reference	
NMP	National Mapping Programme	
NMR	National Monuments Record, Swindon	
OS	Ordnance Survey	
PRN	Primary Record Number in Cornwall HER	
RCM	Royal Cornwall Museum, Truro	
WHS	World Heritage Site	



1 Summary

AC Ltd was commissioned by Daniel Conley of Plymouth University to undertake an archaeological assessment of the site of a proposed temporary radar station at Perranporth Airfield (NGR SW 74090 53220), in accordance with a brief provided by Daniel Ratcliffe, Historic Environment Advisor (Archaeology), to facilitate appropriate planning decisions.

The proposed temporary radar station, forms part of scheduled monument 32957: World War II Fighter Pens and Defences part of RAF Perranporth and also includes part of the St Agnes Mining District of the Cornish Mining World Heritage Site. The airfield also sits within a rich mosaic of historic landscapes with significant timedepth (Ratcliffe p1).

The assessment recorded a number of sites in the proposed development area principally associated with post-medieval mining and the World War II airfield, RAF Perranporth, though a number of prehistoric barrows have also been recorded in the vicinity.

With slight changes to the proposed layout (specified in recommendations), the proposed development is likely to have little impact on the identified sites on completion of the project. A watching brief of the electric trench should allow for appropriate archaeological management of additional sites in this area.

2 Site location

2.1 Location

The site is located approximately one kilometre southwest of Perranporth in the civil parish of Perranzabuloe at the northern end of the airfield (NGR SW 74090 53220, Figure 1).

2.2 Topography

The site is situated on an open and gently undulating coastal plateau to the southeast of 90m high sea cliffs.

2.3 Geology

The bedrock is recorded as Gramscatho Group metamudstone and metasandstone (British Geological Survey), laid down around 350 million years ago when Cornwall was under the sea (Trembath p41), with a dyke of Permian Felsite running northeast from Hanover Cove across the site. An area of St Agnes Intrusion granite lies immediately to the northwest at Cligga Head, formed around 300 million years ago. As the granite cooled cracks opened and filled with minerals leached from the rock, forming veins of quartz rich with tin and copper. Above the granite, superficial deposits of beach and tidal sand and silt are recorded (British Geological Survey).

Surface mine waste appeared consistent with this, including fragments of granite and considerable quantities of slate or shale at the southwest end of the area (Site 1) and predominantly quartz fragments at the northeast end of the area (Sites12-16).





Figure 1 Location

3 Project background

3.1 Development background

Following an unsuccessful planning application (T25/0287/10/B) and collaboration between Phil McMahon of English Heritage and Dan Ratcliffe (Historic Environment Planning Advice Officer) the client was advised to commission an archaeological assessment to provide additional information and archaeological recommendations to support a new planning application and related scheduled monument consent application.

A brief for archaeological assessment was provided by Ratcliffe (2010).

The proposed radar station is designed to monitor wave activity in the Bristol Channel for a period of four years as part of the wave hub project. It involves:

- the erection of 20, 4m high antennae, each with a 0.3m diameter by 0.5m deep concrete foundation and pegged guide wires.
- a temporary laboratory porta-cabin (4 by 2m)
- the excavation of a 400m long electricity supply trench.



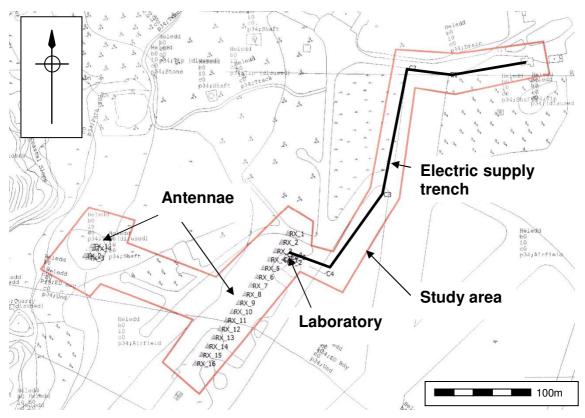


Figure 2 Proposed radar station layout

3.2 Archaeological and historical background

Perranporth Airfield, or Trevellas as it was originally called is the site of Trevellas Downs Bronze Age barrow cemetery (PRN 19400), which included seven or eight barrows. Trevellas Barrow measured 8.8m diameter by 0.45m high in 1940, when it was levelled for the construction of the airfield in 1940. Trevellas Little Burrow (PRN 19400.2) lies approximately 100m to the south of the study area.

Another Bronze Age barrow at Caer Dane approximately 3km to the east was also the site of an Iron Age hillfort. To the northeast Caer Kief and Perran Rounds are likely to have been occupied in the late Iron Age and Romano-British period and Perran Round was re-used in the middle ages as a "plain-angwarry" (Trebath p39).

The name 'Trevellas' has been interpreted as "the thatched housestead"

(Berry and Mansell, p5), suggesting an Early Medieval origin. The site is thought to lie within the Manor of Tywarnhayle or Tywarnhayle Tyes (David Thomas pers com.). The Manors of Tywarnhayle and neighbouring Perranzabuloe are recorded in the Domesday Book of 1086 (Morris p121a and b). Tywarnhayle was held by Algav before 1066 and by The Count of Mortain from St Petroc's in 1086. It included land for 20 ploughs as well as 12 acres of woodland and pasture 5 leagues long by one league wide. It had 20 unbroken mares; 10 cattle and 250 sheep (Morris p121a). Strip fields (PRN53688)



separated by low earth banks at the southwest end of the site are likely to date this period.

Trevellas is first recorded in 1306 (Padel p170), Trevellas Manor Farm is thought to have been built from the ruins of Old Trevellas House (Berry and Mansell p32).

The Post-Medieval period saw the development of mining in the area, principally exploiting the copper and tin deposits, though Wolfram was also mined during the C20th at Cligga Mine. Great St George mine was first mentioned in 1598 (PRN 41125). Good Fortune mine (PRN 163237), recorded in the early C19th also included numerous smaller and earlier works, whilst Wheal Union mine (PRN163385) operated from 1800-1804.

The wreck of the packet ship "Hanover" in 1763 (PRN 164413) gave its name to the cove immediately to the west. The vessel was included in the list of designated wrecks on 19/7/1997 and has an exclusion zone radius of 250m.

Both the 1801 (OS) and 1840 (Tithe) maps show the study area as unenclosed with the Tithe apportionment listing it as Trehayle Common. The 1880 and 1888 OS maps show increasing land enclosure to the southeast of the study area, as well as the disused Perran St George Copper Mine.

In 1889 The British and Colonial Explosives Company started the construction of the explosives works immediately to the north of the study area (Earl p262) with production commencing in 1891. This was taken over by Nobels 1893 and closed by 1905, re-opening for shell manufacture during World War I. (Berry and Mansell p80). Site 18 (Figure 3) was the original office and laboratory for the explosives factory (Earl p267).

The 1907 OS map shows further encroachment of enclosure fields immediately to the southeast of the study area, the explosives works and the Good Fortune Tin Mine, which appears to have reworked some of Perran St George's shafts.

The Perranporth Aerodrome website reports that by March 1924 a former World War I training bi-plane, Avro 504K operated from here, taking locals for flights.

By 1933 (OS map) Good Fortune Mine is depicted as disused.

In 1940, following the evacuation of Dunkirk, the area is purchased by the Air Ministry and construction of the airfield began. This appears to have involved the levelling of considerable mine waste and associated buildings as well as a number of the Bronze Age barrows.

In April 1941 Trevellas Airfield opens, with a single squadron (Squadron 66) of 12 Spitfire Mark II As (Andrew p1), split into two wings based at the north end of the airfield. In September 1941, 118 Squadron arrived at the airfield, followed by 130 Squadron in December (both spitfire squadrons). By 1942 a more offensive role was undertaken with fighter sweeps across the channel to northern France.

In 1943 extensions to the runway, a new operations room and control tower are constructed and the mine buildings at Cligga Mine are lowered to improve



access to the runways. Spoil heaps around the overshoots are also moved as the airfield continued to grow (Andrew p2).

In 1944 many of the Spitfires stationed at Perranporth were moved to Merston Airfield near Chichester in preparation for D-Day and were replaced by Squadrons of Swordfish and Avengers. The airfield closed on April 1st 1944 although it saw brief use the following year. The airfield was placed on a Care and Maintenance basis in May 1945 and sold off with the condition that the buildings were taken down to facilitate its return to agricultural use (Fletcher and Newman p2-3).

Whilst most of the buildings were taken down, the airfield was used for military glider training from 1945-1957 and in 1957 the Perranporth Gliding and Flying Club was formed (Perranporth Airfield website).

4 Project aims and objectives

The principal aims were to:

- Identify, list, interpret and assess the local/regional/national significance of all sites of archaeological and historical importance within the site and in its immediate surroundings
- Identify construction, use and end of life impacts of the current proposal on the identified sites
- Make recommendations for the appropriate management of the archaeological/historical resource/ further archaeological or historical work required
- Disseminate the findings appropriately.

5 Method statement

5.1 General methodology

AC complies with the guidelines set out in the IfA's Standards and Guidance and follows the IfA code of conduct.

5.2 Desk-based assessment (DBA) and walk over survey

An initial DBA concentrated on the Sites and Monuments Records (SMR), photographic records at the Cornwall Studies Library, Courtney Library, World Heritage Site information, The Air Ministry Perranporth Record Site Plan (1945), English Heritage RAF Perranporth Archaeological Survey (Fletcher and Newman), Andrew's History of RAF Perranporth 1941-1945, Edwards' Perran at War, Old Cornwall Society and Trembaths studies of Perranzabuloe and a map regression exercise.

Further research included conversations with Frank Tyrer (stationed at RAF Perranporth in World War II) and Bob Andrew who kindly provided considerable additional material, including many images of the site.

A walk over survey recorded extant visible remains on the site allowing the existing plan to be annotated with archaeological detail.



Selective scaled digital colour photography was used to facilitate interpretation and to illustrate the report.

5.3 Report

Copies of the archive report will be submitted to: the client; the County Historic Environment Record (HER); Cornwall Record Office; National Monuments Record (NMR) in Swindon and all significant contributors where (with the exception of the client's and contributors' copies) they will be available for public consultation.

5.4 Archive

The documentary archive will be prepared in line with the brief and deposited with the Cornwall Record Office, within two months of the completion of the final report.

5.5 Web-based publications

An online OASIS record will be completed when the report is submitted.

6 Results

Sites of archaeological significance identified within the area and its immediate vicinity are located on the site plan (Figure 3), numbered from Site 1 in the southwest to Site 19 at the northeast end of the site.

The significance of each site is graded as follows:

WHS- World Heritage Site

- S Scheduled Monument
- L Listed Building
- A Site of National Importance
- B Site of Regional Importance
- C Site of Local Importance
- D Site of Natural Feature or non antiquity

The condition of each site was assessed during the walk-over survey from 1-4:

- 1 No surviving remains above ground
- 2 Poor preservation
- 3 Fair preservation
- 4 Good preservation



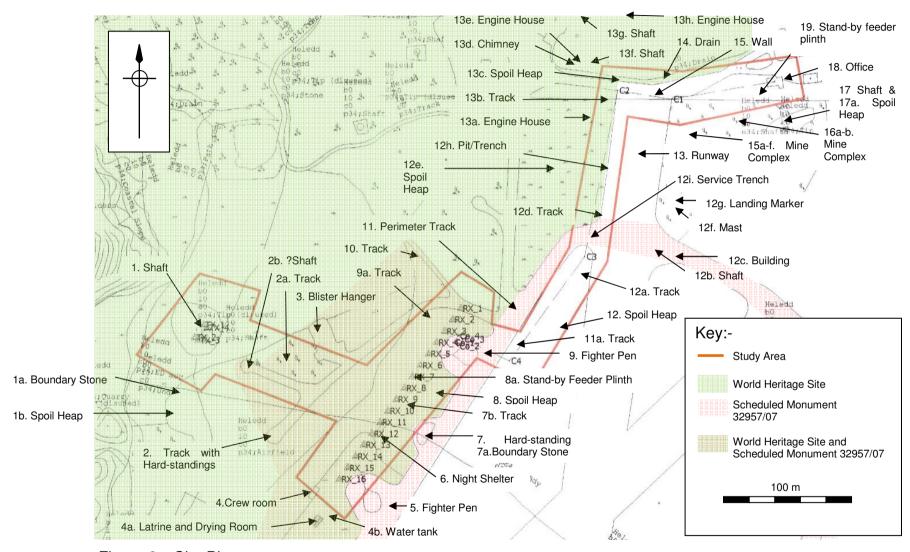


Figure 3 Site Plan



Site No.	Name	NGR (SW)	Description	Probable date	Grade	Condition
1	Shaft	73912 53197	Shaft with conical cover, remnants of stone-faced earth collar and associated spoil typically comprising 30-60 millimetre angular stone fragments. The shaft is shown on 1 st edition O.S map of 1880, but by 1907 (OS map) it is out of use (Plate 1).	Post- medieval	WHS	3
1a	Boundary Stone	73890 53153	Parish Boundary stone set in spoil heap (1b) now partly obscured by gorse. Wedge-marked, pinkish brown granite. Boundary shown in 1840 (Tithe) and boundary stone marked on O.S map of 1880.	Post Medieval- pre 1800	С	4
1b	Spoil Heap	73890 53153	Spoil heap south of Shaft (1).	Post- Medieval	WHS	4
2	Track with hard-standings	73962 53167	Branching tarmacced spur track, connecting to perimeter track to northeast, with two circular aircraft hard-standings to the southwest shown on 1945 Air Ministry plan.	1940-1	S	4
2a	Track	73973 53164	Site of track marked on 1880 OS map linking mine workings	Late C19th	WHS	1
2b	Possible Shaft	73946 53173	Concave depression in tarmac of track (2) terminus hard- standing indicates possible shaft below.	Post- Medieval	WHS	1
3	Blister Hanger	74010 53197	Tarmacced floor of former blister hanger, shown as Building 92 on Air Ministry (1945) map. Graded stone hardcore base evident below. Rows of iron bolts at the north, northwest, southwest and southeast extremities of the area. An additional row of three paired holding-down bolts appear to have fixed a heavy probable metal structure in place, forming an imprint in the surface of the	1940-1	S	2



			tarmac in southwest corner of the hanger.			
4	Crew Room	73999 53072	Rectangular concrete floor of former crew room shown as Building 89 on Air Ministry plan (1945). The floor measures 10.50m by 5.00m. Joins on the base show a three part construction.	1940-1	S	2
4a	Latrine and Drying Room	74001 53049	Concrete floor of former latrine and drying room shown as Building 86 on Air Ministry plan (1945). The structure measured 9m by 5m with occasional broken concrete blocks, indicate the line of internal walls which separated four equally sized rooms (Plate 2).	1940-1	S	2
4b	Water Tank	74004 53054	Concrete water tank base at the northern end of 4a.	1940-1	S	3
5	Fighter Pen	74045 53066	E-shaped fighter pen shown on Air Ministry plan (1945), enclosed to the south, west and north by an earth mound approximately 2.00m high, originally defined by up to 24 courses of sandbags. The sandbags have decayed though much of the sand is still evident, dispersed by considerable rabbit activity. This surrounds 2 tarmac hard standings, divided by a central concrete block-faced earth wall approximately 1m wide. Each hard-standing was provided with two metal hoops to tether the tail of aircraft to prevent it lifting during engine revving (Bob Andrew pers comm.). A 2.00m wide prefabricated concrete (Stanton) air-raid shelter runs 7.60m through a central earth mound 2.77m high. The blast protected (staggered) entrances to the shelter are built of red brick and remnants of barbed wire were found on these entrances. Concrete hard-standing inserted into the tarmac of the	1940-1	S	4



			northern pen to prevent spilt fuel corroding the tarmac surface. Currently used as a storage area for building materials.			
6	Night Shelter	74053 53124	This rectangular building shown as Building 90 on Air Ministry plan (1945) of concrete and concrete block construction with external reinforcements is near intact. It has a reinforced concrete roof, blast walls at each end, and galvanised protective doors. Internally concrete block-built partitions form shallow bays flanking a central walkway, support two tiers of former beds. A central air vent runs the length of the building. Externally the building measures 13.50m northeast to southwest by 3.60m by 3.50m in height.	1940-1	S	4
7	Hard-standing	74089 53121	A semi-circular tarmac hard-standing shown on Air Ministry plan (1945), loops beside the runway. Possibly used for re-fuelling and rearming aircraft.	1940-41	S	4
7a	Boundary Stone	74087 53116	Site of Parish boundary stone, no longer extant. Shown on 1 st edition O.S map of 1880, but apparently removed by 1907 (OS map).	Post- Medieval	С	1
7b	Track	74077 53143	Site of track shown on 1 st edition O.S map of 1880, linking mine workings but no longer present by 1907 edition.	Post- medieval	WHS	1
8	Spoil Heap	74095 53155	Spoil heap planned in 2003 (Fletcher and Newman Fig 5)	Modern	D	2
8a	Stand-by Feeder Plinth	74070 53161	Low flat-topped mound shown as Building 91 on Air Ministry plan (1945), presently largely obscured by vegetation.	1940-1	S	2



9	Fighter Pen	74124 53183	Similar to site 5 shown on Air Ministry plan (1945), but with collapse of parts of the central dividing wall and no concrete hard-standings (Plate 3-4).	1940-1	S	4
9a	Track	74097 53207	Site of track marked on 1880 and 1888 OS maps linking mine workings, is not depicted on 1907 OS map.	Late C19th	WHS	1
10	Track	74092 53256	A 1.80m wide tarmac track shown on Air Ministry plan (1945), leading to the sites of two rectangular store buildings each with extant concrete floors.	1940-1	S	3
11	Perimeter Track	74168 53220	Perimeter track shown on Air Ministry plan (1945), with original tarmac linking runways with fighter pens and service areas.	1940-1	S	4
11a	Track	74228 23138	Site of track marked on 1880 and 1888 OS maps linking mine workings, no longer depicted by 1907 (OS map).	Late C19th	WHS	1
12	Spoil Heap	74193 53202	Low oval spoil heap measuring approximately 20m by 15.00m. Mainly comprising angular rubble of slate and granite with a thin layer of topsoil.	Modern	D	2
12a	Track	74221 53239	Site of track marked on 1880 and 1888 OS maps linking mine workings, no longer depicted by 1907 (OS map).	Post- Medieval	WHS	1
12b	Shaft	74270 53264	Site of shaft shown on 1880 and 1888 OS maps, associated with Perran St George disused copper mine and as old shaft by 1907. Presumably backfilled for the construction of runway and perimeter track in 1940-1. Now under runway tarmac.	Post- Medieval	В	1
12c	Building	74284 53355	Site of building shown on 1880 and 1888 OS maps, but demolished to allow for new field enclosures and access track by 1907 (OS map). Now beneath perimeter track,	Post - Medieval	В	1



			though some fragments of quartz, granite and some brick found immediately to the south may be demolition rubble.			
12d	Track	74257 53304	Site of track marked on 1880 and 1888 OS maps linking mine workings, no longer depicted by 1907 (OS map).Now under tarmac.	Post- Medieval	WHS	1
12e	Spoil Heap	74211 53362	Overgrown and largely levelled spoil heap associated with Perran St George Copper Mine, shown as disused on 1880 and 1888 OS maps. Sizeable granite debris evident on surface.	Modern	WHS	2
12f	Mast	74290 53310	A <i>c</i> 7m high triangular radio mast constructed of tubular steel standing on a 5.00m by 3.00m concrete platform. With a tangle of metal and a piece of 67 strand cable at the base (Plate 5).	Modern	С	3
12g	Landing marker	74280 53306	An uneven concrete landing marker painted white. In the shape of a double cross, measuring 12m long by 5m wide (Plate 5) .	Modern	С	3
12h	Pit / Trench	74234 53329	Cut into the concrete and tarmac on the edge of the runway. Stepped slope of debris at the edge. The pit/trench measured 1.4m wide by 0.5m deep, but its lenth was obscured by vegetation. It included a modern tyre.	Modern	D	3
12i	Service trench	74218 53278	Service trench, cut through tarmac at junction of perimeter track and runway.	Modern	D	4
13	Runway	74268 53392	Runway No 3 running north to south shown camouflaged in 1941 (Fletcher and Newman p3). Tarmac surface with modern white painted lines and markings at northern end.	1940-1	Α	4



			Scalping piles and oil drums at west edge.			
13a	Engine House	74210 53392	Site of Engine House, first shown on 1907 OS map as part of Good Fortune Tin mine, disused by 1933 (OS map) and destroyed <i>c</i> 1940-43. Site currently overgrown, with no obvious trace of the former building identified.	Post- Medieval	WHS	1
13b	Track	74303 53391	Site of track marked on 1880 and 1888 OS maps linking mine workings, no longer depicted by 1907 (OS map).	Post- Medieval	WHS	1
13c	Spoil heap	74223 53403	Site of spoil heap associated with Sites 13e and f all part of Perran St George Copper Mine shown as disused by 1880. The spoil heap is shown on 1880-1933 OS maps. Probably levelled in 1943 as part of airfield improvements. Slate and quartz rubble evident on field surface immediately to the north.	Post- Medieval	WHS	1
13d	Chimney	74204 53422	Site of chimney associated with Sites 13c and f all part of Perran St George Copper Mine shown as disused by 1880. The chimney is not shown on 1933 OS maps. Area currently overgrown though a fine-grained granite possible foundation stone measuring 1.3m long, by 1.1m wide by 0.3m thick was found immediately to the east.	Post- Medieval	WHS	1
13e	Engine House	74214 53415	Site of Engine House associated with Sites 13c,d and f all part of Perran St George Copper Mine shown as disused by 1880. The chimney is shown as a ruin in 1880, but was still standing in 1933 (OS map). Probably levelled in 1943 as part of airfield improvements. Area currently overgrown, but no masonry obvious above the undergrowth.		WHS	1
13f	Shaft	74221	Site of shaft associated with Engine House (13e) part of	Post-	WHS	1



		53418	Perran St George Copper Mine shown as disused by 1880. The shaft is shown from 1880-1933 but its position is now overgrown.	Medieval		
13g	Shaft	74217 53463	Site of shaft associated with Engine House (13h) part of Perran St George Copper Mine shown as disused by 1880. The shaft is shown from 1880-1933 but its position is now overgrown.	Post- Medieval	WHS	1
13h	Engine House	74242 53469	Site of Engine House shown as a ruin in 1880 (OS map) and associated with Shaft (13g) part of Perran St George Copper Mine, disused by 1880. Possibly levelled during construction works associated with the explosives factory 1889-91.	Post- Medieval	WHS	1
14	Drain	74270 53404	Modern earth-cut drain.	Modern	D	4
15	Wall	74268 53386	Site of a linear feature, entitled stone, shown on the OS 1907-1933 maps, presumably demarking the exclusion zone associated with the explosives factory (built 1889-91). The feature is not shown on the 1945 plan (Air Ministry) and was presumably taken down to facilitate the construction of the airfield between 1940-1 or as part of the 1943 improvements. A wire fence supported on 1.30m high concrete posts, and south of sites 18 and 19 an earth bank, currently demarks the northern edge of the airfield on the line of the feature.	Post- Medieval	В	1
15a	Building	74289 53359	Site of rectangular building associated with Sites 15b-f all part of Good Fortune Tin Mine. The building, shown in 1907 has apparently been taken down by 1933 (OS maps) when Good Fortune Mine is described as disused.		В	1



			The complex was levelled for the construction of the airfield 1940-1 and is currently overgrown, with no masonry obvious.			
15b	Shaft	74300 53358	Site of shaft associated with Perran St George Copper Mine, the shaft is depicted in 1880, by which point the mine was disused. The shaft appears to have been reworked by Good Fortune Mine for tin in the late C19/early C20th when it was provided with a drain (OS 1907 map). The shaft is still depicted on the 1933 OS map, but was probably backfilled during airfield construction 1940-1. No longer evident on the surface.	Post- Medieval	В	1
15c	Drain	74302 53346	Site of drain associated with the reworking of shaft 15b and excavation of shaft 15d for tin by Good Fortune Mine, first shown 1907 (OS map). Not depicted in 1933 when the mine had gone out of use.	Post- Medieval	В	1
15d	Shaft	74309 53346	Site of rectangular shaft excavated between 1888 and 1907 for Good Fortune Tin Mine, disused by 1933 (OS maps) and presumably backfilled in 1940-1.	Post- Medieval	В	1
15e	Track	74330 53354	Site of track providing access to Good Fortune Tin Mine depicted from 1907-1933 presumably covered in 1940-1.	Post- Medieval	В	1
15f	Spoil Heap	74300 53346	Site of spoil heap associated with Perran St George Copper Mine and latterly Good Fortune Tin Mine, depicted 1880-1933 and levelled for the airfield 1940-1	Post- Medieval	В	1
16	Building	74329 53329	Site of building associated with Perran St George Copper Mine in 1880-8 (OS maps). Some low undulations on the ground, may be wall footings.	Post- Medieval	В	2



16a	Shaft	74343 53346	Shaft associated with Perran St George Copper Mine shown from 1880 and currently covered with galvanised steel cone and marker post.	Post- Medieval	В	3
16b	Spoil Heap	74343 53346	Site of small spoil heap associated with 16a shaft but not marked by 1907	Post- Medieval	В	1
17	Shaft	74380 53363	Shaft associated with Perran St George Copper Mine shown from 1880 and currently covered with galvanised steel cone and surrounded by barbed wire fence supported by concrete posts. Two wooden replacement posts to west side.	Post- Medieval	В	3
17a	Spoil Heap	74380 53363	Site of spoil heap associated with 17 shaft shown from 1880-1933, presumably levelled by airfield 1940-1.	Post- Medieval	В	1
18	Office	74372 53400	British and Colonial Explosives Factory office and laboratory, built 1889-91. Stone built single storey building with gable roof. Light yellow brick quoins and details. Red brick chimneys with a modern slate roof. Rear concrete block-built out-house to the south and porch to north. Same construction as surrounding buildings related to the gunpowder factory. Shown from 1907 onwards (Plate 6). Used as Military Transport Office for the airfield 1941-5 (Air Ministry Building 106).	Post- Medieval	В	4
19	Stand-by Feeder Plinth	74356 53393	Concrete block built building built 1940-1 for the airfield, shown as Building 107 on 1945 plan. Currently outside the airfield and overgrown.	1940-1	A	3





Plate 1 Site 1 shaft with collapsed collar looking west



Plate 2 Site 4a Latrine and drying room floor with Site 4b concrete water tank stand in background, looking northeast



Plate 3 Site 9 brick-built blast protection for Stanton air raid shelter at centre of fighter pen looking east



Plate 4 Site 9 Interior of Stanton air raid shelter at centre of fighter pen looking northeast



Plate 5 Site 12g landing marker (foreground) and 12f radio mast (rear) looking east



Plate 6 Site 18 office (centre), with Site 19 stand-by feeder plinth (left) largely covered with vegetation, looking northeast



7 Discussion

The laying out of the airfield in 1940-1 and its subsequent improvements in 1943 effectively levelled virtually all upstanding archaeological features within the study area. Whilst some of the shafts are still evident, below the levelling layer, considerable evidence of mining activity associated with the Cornwall WHS is likely to preserved, which probably includes footings for buildings, remnant spoil heaps, pits, shafts and other workings. Given the proposed electric trench is 400m long it seems likely that it will disturb mining related and possibly other archaeological deposits.

The features associated with the airfield are generally well preserved in plan, though many buildings were taken down immediately after World War II. The majority of the surviving airfield evidence in the study area represents the provisions for one wing of the original fighter squadron (Squadron 66) sent to Perranporth in 1941. As such it is amongst the earliest part of the airfield (along with its corresponding wing to the east) and the sand-bag re-enforced fighter pens are of a rare type, apparently reflecting the speed with which the airfield had to be constructed. Later more common 'K' type pens on the south side of the airfield were constructed with concrete walls.

8 Statements of Significance

8.1 Cornwall World Heritage Site- St Agnes Mining District (Sites 1, 1b, 2a-b, 7b, 9a, 11a, 12a, 12d-e, 13a-h).

These sites are described by UNESCO as of outstanding universal value in representing a coherent series of highly distinctive cultural landscapes resulting from the industrial transformations of the period 1700-1914.

8.2 Associated sites (12b-c, 15a-f, 16a-b and 17a)

These sites are associated with the WHS described above and as such are considered of national importance.

8.3 Scheduled Ancient Monument No 32957/07: RAF Perranporth (Sites 2, 3, 4a-b, 5, 6, 7,8a, 9, 10, 11)

These sites are considered to be of national significance as they form part of the remarkably complete World War II Fighter station RAF Perranporth.

8.4 Associated Sites (13, 18 and 19)

These sites are not scheduled, but relate to RAF Perranporth and as such are considered to be of national importance.



9 Recommendations

The following recommendations should minimise the impact of the proposal upon recognised and likely archaeological sites in the study area (Figure 4):

- 1 Move RX 1-16 antennae approximately 20m to the west to avoid Sites 4-9
- 2 Move southwest end of electric trench north to avoid disturbance to Site 9 tarmac
- Reuse the existing service trench if possible to minimise damage to Site 11 tarmac, where proposed electric trench crosses perimeter track
- 4 Keep electric trench running beside perimeter boundary to avoid Sites 15-19
- 5 Undertake archaeological watching brief of electric trench to monitor for unidentified archaeological deposits
- 6 Use drab green or grey colour porta-cabin for the temporary laboratory building.



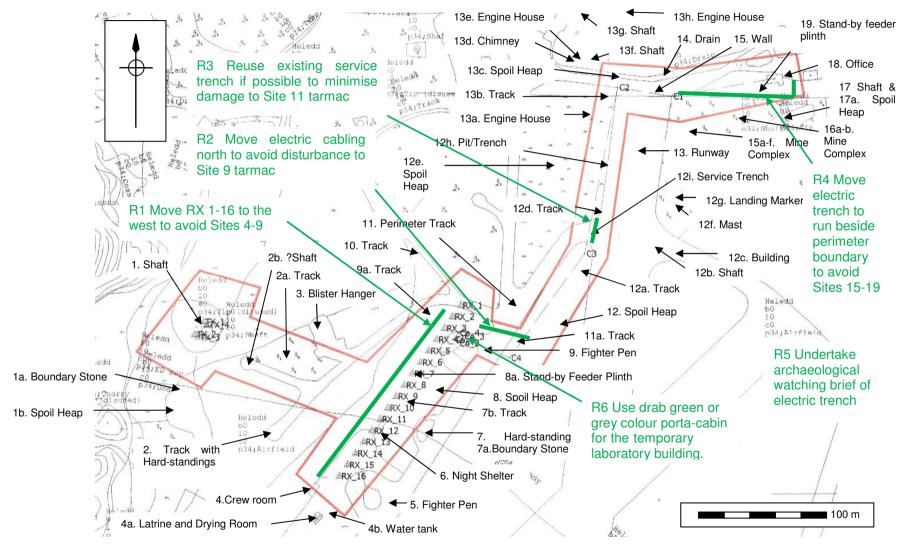


Figure 4 Recommendations



10 Impacts

The construction and closure phase impacts are likely to concern the antennae foundations and the electric trench. The operational phase principally concerns the temporary visual impact of the antennae and laboratory building.

Impacts identified are:

Site 1 Shaft

Up to four 0.3m diameter cores will be cut through the spoil heap surrounding shaft Site 1) to a maximum depth of 0.5m to provide the foundations for TX antennae 1 and 2. Given the scale of the spoil heap, likely depth of deposit and hand auguring, this is considered to be a minor negative impact.

Site 11 Perimeter Track

The electric trench will cross the perimeter track twice, involving the repair of the track with modern tarmac for a 0.3m wide trench, east of Site 9 and at Site 12i. Notably the perimeter has already had a number of sizeable repairs in the vicinity including a service trench (Site 12i).

Site 13 Runway

The proposed electric trench will cross the runway once at the extreme north end of the airfield, involving the repair of the runway with modern tarmac for a 0.3m wide trench.

Electric Trench

A single mini-digger will be required to excavate the electric trench from Site 18 to Site 9, using a 0.3m wide bucket down to a maximum depth of 0.5m. This is likely to be excavated predominantly through the levelling layer associated with the construction of the airfield in 1940-1 and its improvements in 1943. Previously unidentified archaeological deposits below this layer may be recorded as part of a watching brief.

Operational impacts

Whilst operational (4 years) the 18, 4m high antennae will alter the appearance of the northwest part of the airfield, particularly the view of the fighter pens (Sites 5 and 9) from the west. Conversely the positioning of the antennae to the west of the fighter pens will make them relatively unobtrusive to the main airfield.

The proposed temporary laboratory (porta-cabin style) building (c 4 by 2m) sited in the northern half of fighter pen (Site 9) will temporarily detract visually from the view of the northern half of the pen, but this will make it less obtrusive to the remaining airfield.

Arguably the temporary installation of radar antennae and a porta-cabin is inkeeping with the military architecture of the site.

Given the adoption of the above recommendations, the small-scale nature of the proposed development and the hand-auguring of the antennae bases, little impact will be made to the known archaeology of the study area.



11 Conclusion

No prehistoric archaeology was identified within the study area as part of the assessment though a number of barrows have been identified to the south. The construction of the airfield has effectively levelled all earlier archaeological features in the study area except the office building (Site 18), though it is likely that archaeological deposits survive below this layer, especially relating to the post-medieval mining activity.

Given the adoption of the above recommendations the proposal is likely to have only very limited archaeological impact which arguably is likely to be outweighed by the potential benefits of the wave hub project and potentially by the recording and dissemination of new sub-surface discoveries as part of the watching brief.

12 The Archive

The AC Ltd project number is AC10007E.

The project's archive is housed temporarily at the offices of Archaeological Consultancy Ltd, Goodagrane, Halvasso, Penryn, Cornwall, TR10 9BX before transferral to the Cornwall Record Office, Old County Hall, Station Road, Truro, Cornwall. The archive is documentary in nature in A4 format. It includes: site notes, research notes as well as copies of the brief, WSI and site report.

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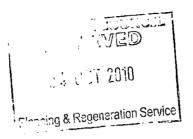
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Mr James Holman Cornwall Council Carrick House Pydar Street Truro Cornwall TR1 1EB



Direct Dial: 0117 9750699 Direct Fax: 0117 9750684

Our ref: P00092907

28 September 2010

Dear Mr Holman

Notifications under Circular 01/2001 & GDPO 1995 THE AIRFIELD, TREVELLAS AIRFIELD, PADSTOW, CORNWALL, TR5 0XS Application No PA10/05731

Thank you for your letter of 20 September 2010 notifying us of the application for planning permission relating to the above site. We do not wish to comment in detail, but offer the following general observations.

English Heritage Advice

The applicant has successfully applied for Scheduled Monument Consent (SMC) to undertake the part of these proposed works that lie within the boundary of the Perranporth Airfield Scheduled Monument (No. 32957). In the process of achieving SMC the applicant has demonstrated the sustainability of the project in heritage terms and has agreed to an appropriate programme of archaeological mitigation works which will offset any heritage impacts.

Recommendation

We would urge you to address the above issues, and recommend that the application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice. It is not necessary for us to be consulted again. However, if you would like further advice, please contact us to explain your request.



Telephone 0117 975 0700 Facsimile 0117 975 0701 www.english-heritage.org.uk



Yours sincerely

Pul MM

Phil McMahon

Inspector of Ancient Monuments

E-mail: phil.mcmahon@english-heritage.org.uk

cc: Dan Ratcliffe, Cornwall Council HES

Ann Preston-Jones, EH HEFA



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English Heritage is subject to the Freedom of Information Act. All information held by the organisation will be accessible in response to a Freedom of Information request, unless one of the exemptions in the Act applies.

Your Ref: PA10/05731 Our ref: LA/2/50

Date: 11th September 2010

Cornwall Council
Cornwall Council (Central 1 Area)
Circuit House
St Clement Street
Truro

For the attention of: James Holman



Natural England Pydar House Pydar Street Truro TR1 1XU

Tel: 0300 060 2544 Fax: 0300 060 2545

Dear Sir

Proposal: Temporary installation of transmit (TX) array, a receive (RX) antenna array & a

laboratory cabinet

Location: The Airfield, Higher Trevellas, St Agnes

Thank you for consulting Natural England on the above proposal. Your letter was received by this office on the 20th October 2010.

The application site is partly located within the Cligga Head Site of Special Scientific Interest (SSSI). This reply comprises our statutory consultation response under the provisions of Article 10 of the Town and Country Planning (General Development Procedure) Order 1995 and Section 28 of the Wildlife and Countryside Act 1981. From the plans submitted it appears that the TX antenna and a very short section of electrical and phone cables may be installed within the SSSI. However, it is understood from the Design and Access Statement that accompanies the application that the cables will be placed on the surface, eliminating the need for any excavations within the SSSI. In addition, the antenna will be located along the line of an existing fence and where possible will use existing posts.

The cliffs and adjacent mine workings are of outstanding geological interest exposing greisened granite and rare minerals. The location of the proposed transmitters is rich in mine workings and it will be important to ensure that disturbance of the mine spoil/ mine workings is kept to a minimum. The proposed development is considered unlikely to significantly affect the SSSI in the long-term, subject to suitable methods being used for installation and removal.

Natural England has no objection to the proposed development in relation to biodiversity, subject to the following conditions being implemented to avoid any long-term adverse impacts on the SSSI features of interest:

- 1. No heavy machinery to be used for installation or decommissioning of equipment within the SSSI without prior agreement in writing from Natural England.
- 2. Disturbance of the ground to be kept to a minimum, by the re-use of existing posts for installation of TX antenna where possible.
- 3. Prior to any excavations being carried out within the SSSI mineral rich topsoil/ heathland/grassland turves should first be removed, carefully stored, and then restored to their former locations once the work/antenna installation is complete.

- 4. No imported materials, including concrete, to be used for infilling trenches or excavations for fence posts, within the SSSI, without prior agreement in writing from Natural England.
- 5. All antenna, cabling and associated infrastructure to be removed from site at the end of the project.

If your authority decides to allow the development without applying the requirements/conditions set out above it must notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, it has taken our advice into account. It must then allow a further period of 21 days before the development can commence to allow us to consider any further action. For further details of these requirements, and a summary of the legislation protecting SSSI's and the duties which apply to planning authorities, please refer to Part II of Circular 06/2005¹.

Natural England in Cornwall will not, except in exceptional circumstances, object to or provide detailed or case-specific advice on protected species. This should not be interpreted as a statement that there are no potential impacts on protected species and other bodies and individuals may wish to comment. As the local planning authority Cornwall Council has a duty under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 to have regard to the conservation of biodiversity in exercising its functions. This duty includes the requirement to have regard to protected species.

The protection afforded these species is explained in Part IV and Annex A of ODPM Circular 06/2005 to PPS9 Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System. The presence of a protected species is a material consideration when a local planning authority is considering a development proposal that could result in harm to a species or its habitat. If there is a reasonable likelihood of a protected species being present which could be affected by a development then you should require the applicant, through a professional ecological consultant, to provide the following information prior to determination:

- 1. **Survey** thorough and robust survey of the development site and any other areas likely to be affected by the proposals for protected species;
- 2. **Impact assessment** clear assessment of the likely impacts of the proposal upon protected species;
- 3. **Mitigation strategy** to clarify how the likely impact will be addressed in order to ensure no detriment to the maintenance of the population of the protected species at a favourable conservation status. This should be proportionate to perceived impacts and must include clear site-specific prescriptions rather than vague, general or indicative possibilities; and
- 4. **Delivery mechanisms** to include additional information as appropriate to the mitigation strategy that will be required to ensure that the proposed mitigation works are feasible and deliverable e.g. architects plans, licensing arrangements, planning agreements, contractors' precautionary method statements.

Such information should only be left to coverage under planning conditions in exceptional circumstances.

I also recommend that in considering this application you take into account the guidance set out in *Biodiversity and Geological Conservation: Planning Good Practice Guide for Cornwall*

¹ Government Circular: Biodiversity and Geological Conservation – Statutory obligations and their impact within the planning system ODPM Circular 06/2005/Defra Circular 01/2005 http://www.communities.gov.uk/index.asp?id=1144318

(Nov 2007) jointly produced by the former local planning authorities in Cornwall, The Environment Agency, Cornwall Wildlife Trust and Natural England.

Applicants should be informed that planning permission, if granted, does not absolve them from complying with the relevant law, including obtaining and complying with the terms and conditions of any licences required.

In relation to landscape impacts, we note that the application site is within the Cornwall AONB and consequently there may be visual impacts on the AONB. AONBs have been confirmed by the Government as having the highest status of landscape protection and should be given great weight in development control decisions with development proposals being subject to the most rigorous examination. We draw your attention to PPS7 paragraphs 21, 22 and 23. We recommend that you consult with the Cornwall AONB unit and that their advice is taken into full account. Natural England is a member of the AONB partnership and we advise that the AONB unit is best placed to give more detailed advice on landscape issues with respect to the AONB.

Please do not hesitate to contact me if you have any questions or if you require more information.

Yours sincerely

Clare FitzGibbon
Conservation and Land Management Adviser

Annex - General duty towards biodiversity

From 1 October 2006, all local authorities and other public authorities in England and Wales have a duty to have regard to the conservation of biodiversity in exercising their functions. The duty aims to raise the profile and visibility of biodiversity, to clarify existing commitments with regard to biodiversity, and to make it a natural and integral part of policy and decision making. The duty is set out in Section 40 of the Natural Environment and Rural Communities Act (NERC) 2006, and states that:

"Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity"