



The Examination Authority

**Email only**

2 October 2021

Dear Sirs

**Response to Examination Authority Question on Setting.**

The Examining Authority in considering the heritage case with regard to the Farnham Bypass have asked the Applicants (EDF) the following question:

*Please expand on the statement that the primary architectural interest is inherent in the standing building and does not relate to the wider landscape (paragraph 9.4.59 of [APP432])."*

By way of response on behalf of FERN, in my professional opinion, the wider landscape provides the setting to all the identified heritage assets, and this is fundamental to the understanding and appreciation of the built form. Reference must be made to my Impact Assessment where my focus has been on the impact of the proposals on the setting of the identified assets using the guidance provided by Historic England as to how to assess this. My conclusion is that the overall level of harm falls into 'less than substantial harm' but to the very high end of this spectrum (para 7.12 HIA Brighter Planning Ltd). The HIA I produced identifies that the proposed bypass would result in harm to the setting and experience of at least 19 identified heritage assets.

**Setting**

The definition of setting in the NPPF (2021) Glossary 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'*

The NPPF paragraph 200 states that *'Any harm to or loss of the significance of a designated asset (from its alteration or destruction or from development within its setting) should require clear and convincing justification...'* It goes on to state that *'Substantial harm to or loss of a) grade II Listed buildings or grade II registered parks or gardens should be exceptional'*. (My underlining)

Further guidance on setting is given in the Historic England guidance document 'The setting of Heritage Assets' which was used to produce the impact assessment in Section 7 of my document produced on behalf of FERN.

### **Importance of the wider landscape setting to significance**

I would raise the following points with regard to the need to consider the wider landscape setting of the assets as part of the heritage impact assessment for the bypass:

- In assessing the heritage assets affected by the proposed Bypass my HIA noted, in Section 6, that the identified heritage assets contributed to each other and had a very distinctive group value with relatively little modern development to dilute the historic interconnectivity of the buildings. Apart from the Parish Church the buildings are either Grade II Listed or undesignated heritage assets, however their collective group value, in my professional opinion cumulatively raises the significance of the assets.
- The collection of buildings is one of a small secular estate and the related Parish Church which due to their location slightly set away from the village have survived as a distinctive historic entity, notwithstanding the sale of the estate and conversion of the component elements of the former Manor site in the C20. The buildings are still clearly legible within the historic landscape context including the paths and lanes leading to the site.
- The ability to appreciate such a related collection heritage assets within a relatively little altered landscape context, is very rare to find in England today. The Historic England guidance on setting (page 2) identifies those buildings may have a historic or aesthetic connection that amplifies the experience of the significance of each. This is held to be true by the group value of the buildings around the Hall/ Manor and also the landscape setting in which the buildings are located.
- The guidance on setting produced by Historic England in paragraph 17 states that not all settings have the same capacity to accommodate change without harm. Given the buildings have a very strong cohesion with the surrounding land to which the estate related, the synergy between built form and landscape is very strong. The buildings survive within their historic rural landscape context and thus this is very important to the understanding and significance of the assets. The survival of the buildings within a historic landscape context

positively contributes to the significance of the assets. This close connection of buildings and landscape setting means that collectively the assets have a low capacity to accommodate change without resulting in a high degree of harm to be very low.

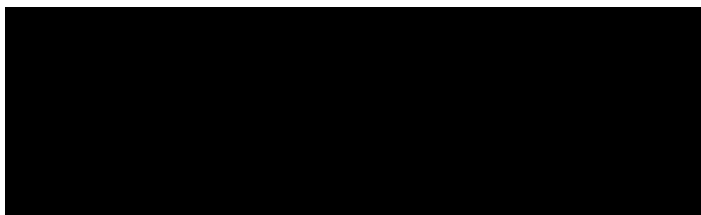
- The Historic England Guidance states that whilst views to and from an asset play an important part in which we experience an asset it is also influenced by other environmental factors such as noise dust and vibration. This impact has to be considered both in terms of the standing buildings but their immediate and wider landscape context to fully assess the impact of the proposals on the appreciation and significance of the assets.

To conclude to focus primarily on the standing buildings does not follow the national guidance and consider the surroundings in which the buildings are experienced, and which helps add to the understanding and appreciation of them. The NPPF acknowledges loss of alteration of a setting requires convincing justification and any resulting harm to the significance of heritage assets should be exceptional case. Given there are 19 assets identified here there is a high bar to justify harm not only to the individual assets but also to consider their collective group value.

The wider landscape setting which is so important to the group value and significance of these assets thus cannot be ignored as it is inherent to the understanding of the buildings. I consider any assessment which fails to consider the setting in its widest extent fails to properly consider the heritage impact of the proposals and the proposed development cannot be considered to be properly justified. This approach would therefore fail to meet the current requirements of the NPPF and the Historic England guidance on setting.

I trust that this clarifies my response to this question made on behalf of FERN

Yours sincerely



Charmain Hawkins

MTPI BA (Hons) Dip Bldg Cons Dip Surv MRTPI IHBC

**Director**