

CONSERVATION TEAM CONSULTATION APPLICATION RESPONSE

APPLICATION REF:	25/01947/FP
CASE OFFICER:	BG
APPLICATION SITE:	Land South of A507 Near Cumberlow Green, Clothall Road, Clothall, Hertfordshire
DESCRIPTION OF WORKS:	Battery Energy Storage System (BESS), ground mounted solar farm, associated infrastructure, access and landscaping.

RECOMMENDATION:
OBJECTIONABLE on the basis that the proposal will fail to fully satisfy the provisions of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the aims of Section 16 of the NPPF and Policy HE1 of the North Hertfordshire Local Plan 2011-2031.

SHORT SUMMARY:

Impact on the setting of listed building

Limited impact upon the setting of several listed buildings the most significant of which being Cromer Windmill.

Impact on the setting of Conservation Areas.

The proposal is sufficiently divorced from the conservation areas at Rushden & Southern Green to the north-east and Weston to the west as not to impact upon their setting.

Harm, preserve or enhance.

Less than substantial harm to the significance of some heritage assets towards the lower end of the continuum would result from this development.

SITE CONTEXT:

As stated in the Planning, Design and Access Statement (July 2025) prepared by Lanpro and entitled 'Westfield Energy Conservation Park' [hereafter referred to as PDAS] the Site is located wholly within the North Hertfordshire District Council, although it abuts the East Hertfordshire District Council boundary on its eastern edge (2.1.4), is situated southwest of the village of Cumberlow Green, approximately 3km northeast of Stevenage. Letchworth Garden City is located approximately 3.7km northwest (2.1.5) the surrounding area of the Site is largely rural including several villages. One listed building of high significance is the Cromer Windmill (grade II*, located in East Hertfordshire and circled in red on the OS base below). The list entry is provided below:

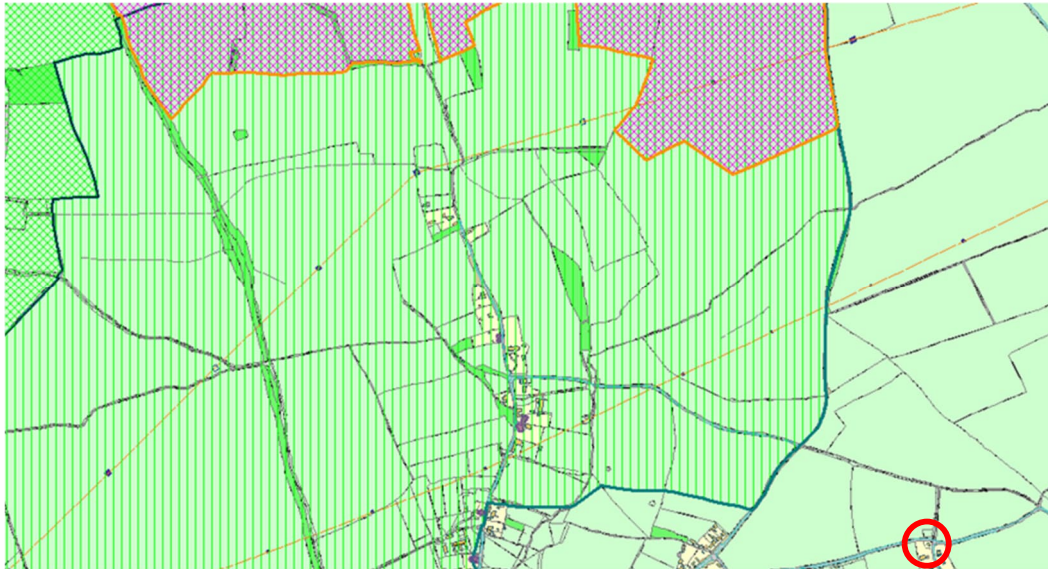
<https://historicengland.org.uk/listing/the-list/list-entry/1101453?section=official-list-entry>

The following is also noted in the PDAS:

2.2.5 There are no designated heritage assets on the Site; Cumberlow Manor House Scheduled

Monument is situated directly northeast of the Site, beyond the A507. Within 1km of the Site, there are two additional Scheduled Monuments: the Lammas Field Roman Villa approx. 610m to the northwest and the Enclosure and Earthworks southeast of Clothallbury House approx. 745m to the north.

2.2.6 Further to the above, there is one Grade II* and 25 Grade II listed buildings within 1km of the Site. The Grade II* listed Cromer Windmill is located approx. 1km to the south of the Site.



DETAILED ANALYSIS AND CONSIDERATIONS:

The key heritage issues are to consider the impact of the proposal upon the setting of designated heritage assets. Apart from mentioning 2.2.5 and 2.2.6, the PDAS goes on to mention archaeology which I do not normally comment on, but I include the following for ease of reference.

2.2.7 The Historic Environment Desk-Based Assessment (Lanpro, June 2025) which is supported by a geophysical survey identifies that there is potential for below-ground archaeological remains from the prehistoric, Roman, medieval, and post-medieval periods to be present within the Site. These include anomalies that are likely to represent settlement evidence, including enclosures, field systems and ring-ditches potentially dating to the Iron Age and/or Roman periods. These features are located in proximity to the conjectured line of the Baldock to Braughing Roman Road, as well as an area where a Late Bronze Age hoard and Roman finds have been recorded, further suggesting an increased likelihood of archaeological survival.

6.7.9 Local Plan Policy HE4 (Archaeology) confirms that planning permission for development proposals effecting heritage assets with archaeological interest will be granted provided that:

- a) Developers submit an appropriate desk-based assessment and, where justified, an archaeological field evaluation;
- b) It is demonstrated how archaeological remains will be preserved and incorporated into the layout of that development, if in situ preservation of important archaeological remains is considered preferable; and
- c) Where the loss of the whole or a material part of important archaeological remains is justified, appropriate conditions are applied to ensure that the archaeological recording, reporting, publication and archiving of the results of such archaeological work is undertaken before it is damaged or lost.

6.7.1 (6.7.13)

The conclusions of the Historic Environment Desk-Based Assessment demonstrate that there is **less than substantial harm, at the lower end of the scale, to the Scheduled Monument and Cromer Windmill and a series of measures are outlined in Section 7 of the Desk Based Assessment which provide a range of methods that can be utilised to avoid or sensitively**

design around any areas of archaeological interest. It is considered that the Proposed Development complies with policy HE4.

6.9.10 No landscape character areas, conservation areas, or key viewpoints are subject to Major (significant) effects at any stage of the project lifecycle. **Views from heritage assets such as the Cromer Windmill have been assessed with the same landscape and visual impact criteria used to evaluate all other views, which is principally of an ordinarily beautiful landscape with a Medium sensitivity.** This is not to say the heritage assets themselves do not carry a high value, but they are assessed on a different basis. There are no significant residual effects predicted in the context of relevant guidance, including the Guidelines for Landscape and Visual Impact Assessment (GLVIA3). The Proposed Development aligns with North Hertfordshire District Council's landscape assessment criteria, including the preservation of valued features and enhancement of local green infrastructure, supporting its overall suitability for the Site.

I have read several of the representations received including those from Rushden & Wallington Parish Council and from Walkern Parish Council. No heritage impact issues were raised by the former whilst Walkern PC state the following under the subheading 'Heritage Concerns':

This area of Hertfordshire is rich in historical and cultural heritage, including listed buildings, ancient hedgerows, and archaeological sites. The proposed development lies in close proximity to several heritage assets, and its visual and environmental impact risks undermining their setting and significance.

The parish council is particularly concerned about the harm the proposal may cause to the Grade II listed Cromer Windmill, located very near the site. The windmill's heritage value is intrinsically linked not only to its physical structure but also to its setting. It is currently surrounded by open fields that continue to produce grain—reflecting the mill's original function and historical context.*

If the solar farm proceeds, the windmill will lose its meaningful relationship with the surrounding landscape, eroding both its visual integrity and its cultural significance.

Whilst I concur with much of what is said above, I am not entirely convinced that Cromer Windmill will completely lose its meaningful relationship with the surrounding landscape.

HERITAGE POLICY ASSESSMENT:

Planning (Listed Building and Conservation Areas) Act 1990:
Section 66(1)

North Hertfordshire Local Plan 2011-2031:
Policy HE1

NPPF (December 2024):

The following paragraphs are relevant:

- **135 c)** (sympathetic to local character and history, including the surrounding built environment),
- **207** (local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting)
- **210** (desirability of new development making a positive contribution to local character and distinctiveness),
- **212** (great weight should be given to the asset's conservation),
- **213** (clear and convincing justification), and
- **215** (harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use).

CONCLUSION:

The National Planning Practice Guidance (PPG) addresses renewable and low carbon energy and confirms that planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the environmental impact is acceptable. It recognises that large scale solar farms *"can have a negative impact on the rural environment, particularly undulating landscapes"* but *"the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively."*

Whilst recognising the Government's objectives towards achieving net zero emissions by 2050 and the promotion of all forms of renewable energy generation, as set out above, paragraph 212 of the NPPF requires that *"... great weight should be given to the asset's conservation...."*. Paragraph 213 says 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 my considered opinion any harm would be placed on the less than substantial harm continuum and even here, it is noted that the most significant impact would be that upon the wider setting of Cromer Windmill. I note CPR's comment that development on this scale would be highly damaging to *"the landscape and rural character, effectively industrialising the landscape in the area which would be covered by glass and metal panels and associated infrastructure"*.

It is considered that the proposal would significantly impact upon the character of the local landscape, which is predominantly rural and agricultural. The site coverage would be visually intrusive and it is acknowledged that the proposal would visually encroach upon and undermine the openness and aesthetic value of the countryside. I am not, however, qualified to respond on landscape matters, and my remit is restricted to that of heritage matters. Whilst archaeology and the setting of archaeological sites are important factors my response is limited to that of distant views impacting upon the wider setting of several listed buildings.

At 4.5.38 of the case officer's delegated file note relating to a *'Proposed solar farm measuring 35.5 hectares with associated battery storage and ancillary infrastructure'* at Land opposite Wymondley Grid Station and to the south of Sperberry Hill, St Ippolyts the following is noted:

The Conservation Officer goes on to agree that the impact would be less than substantial, but contrary to the Heritage Impact Assessments conclusion that the harm would be towards the lower end of the scale, the Officer's view is that the harm would be low to moderate dependent upon distance and intervisibility together with the value of the heritage asset.

At 4.5.42. the planning case officer takes a slightly more conciliatory stance stating that:

The harm identified above is towards the lower end of less than substantial. The benefits of the scheme would include, but are not limited to, the generation of renewable clean and secure energy that contribute towards both local and national efforts to address climate change. The generation of renewable energy is a significant public benefit that would outweigh the less than substantial harm to the designated heritage asset.

The point being that in the Sperberry Hill case, several heritage assets were that much closer and yet the planning officer stated that the harm identified would be towards the lower end of less than substantial harm. In which case, it would be a challenge to say that the less than substantial harm identified in the current case could be placed any higher than that identified in the other case.

There remains some impact upon the character of the area, and which would have some bearing on the rural context and significance of several listed buildings leading to a low level of less than substantial harm. Thus, I am unable to deliver a no objection recommendation and find the proposal **OBJECTIONABLE**.

I acknowledge, however, that 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 (215, NPPF). I also acknowledge that this proposal is to be assessed against several key and sometimes opposing factors and that the case officer must assess those matters 'in the round'.

OFFICER: Mark Simmons

DATE: 16/10/2025