

North Hertfordshire District Council

Building Conservation comments

File Ref: 24/02455/FP

Date: 14/02/2025

Planning Officer: BG

Address: Land opposite Wymondley Grid Station and to the south of Sperberry Hill, St Ippolyts, Hertfordshire

Subject: Proposed solar farm measuring 35.5 hectares with associated battery storage and ancillary infrastructure.

1.0 Recommendation

- 1.1 Paragraph 212 of the NPPF requires that “... *great weight should be given to the asset’s conservation....*”. Paragraph 213 states 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*”. It is considered that the proposal (and specifically placing solar PV array on the central and south-east fields) will significantly impact upon the wider agricultural setting of the heritage assets identified above (two of which are of highest value) and which the applicant acknowledges “*forms a key element of their settings and contributes to the understanding and appreciation of their significance and placement in the landscape*”. The applicant also acknowledges that whilst “*the Proposed Development would not substantially diminish the ability to appreciate the key relationship between the Listed Buildings and their agricultural hinterland,*” any harm to their settings would be “less than substantial” in terms of the NPPF. The proposed solar array together with associated structures and fencing (albeit mainly deer/stock fencing) would be utilitarian and largely metallic man-made features in a dense regular arrangement and would therefore be at odds with the generally natural rural character of the local landscape. Whilst acknowledging that visibility of the proposed development would be partially limited by intervening mature hedgerows, it is still considered that there would be less than substantial harm to the setting of heritage assets in terms of the NPPF. For these reasons, I raise an **OBJECTION** on the basis that the proposal will fail to satisfy the provisions of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the aims of paragraph 135 and Section 16 of the NPPF and the aims of Policy HE1 of the North Hertfordshire Local Plan 2011-2031.

2.0 Summary

- 2.1 The proposal has the capability to affect a range of designated and non-designated heritage assets found around the site. It is acknowledged that the setting of a heritage asset is not fixed and may change as the asset and its surroundings evolve. Guidance from Historic England explains that the extent and importance of setting is often expressed in visual terms but may also include other matters including our understanding of the historic relationship between places.
- 2.2 The Heritage Impact Assessment [hereafter ‘HIA’] acknowledges that the site occupies three agricultural fields, and which historically form part of the surrounding agricultural land which in turn forms part of the wider agricultural

setting to several heritage assets. The wider agricultural setting of each of these assets contributes to the understanding and appreciation of their significance and placement in the landscape in relation to nearby fertile land. These properties had/have a social and functional relationship with the surrounding countryside which contributes to their setting.

- 2.3 The proposal is described as occupying three fields and a public footpath dissects the 'middle field' into effectively two halves. This field has the most significant bearing upon the wider setting of Redcoats, The Wyck and Almshoe Bury and particularly contributes to the sense of rolling countryside currently enjoyed by those using the footpath and would be significantly affected by the proposal. This field lies wholly within the Wymondley and Titmore Green LCA.
- 2.4 On the other hand, the north-western field whilst quite an exposed site, has in my opinion, less effect upon the setting of heritage assets and is also in part affected by the overhead power lines.
- 2.5 On 20 September 2023, I commented on appn ref: 22/00709/FP which was subsequently refused on 22 November 2023. The case officer reported at 4.7.6 of their report that *"The heritage balance set out in NPPF paragraph 202 confirms that it is necessary to weigh the **high, less than substantial harm** to the significance of the designated heritage assets, against the public benefits of the proposed development"*. Even so, no heritage-based reason for refusal was added to the decision notice.
- 2.6 The development's incursion into the agricultural setting and hinterland of several heritage assets is substantial and will harm their significance. Whereas the HIA says that less than substantial harm towards the lower end would be occasioned to the significance of some heritage assets, I suggest that a blanket approach is not appropriate and that parts of the proposal will at least have a moderate adverse impact on heritage assets as also alluded to by Historic England (see 5.7 below).
- 2.7 At para 5.6.22 of the Planning and Design & Access Statement (October 2024) [hereafter 'PDAS'] and with reference to the St Ippolyts Conservation Area it concludes that the *"Resubmission Scheme would cause less than substantial harm to its setting, and the setting of assets therein, in terms of the NPPF, which is consistent with the HIA conclusions for the 2023 Scheme"*.
- 2.8 There is only a 9% reduction in the area of panels compared to the 2023 Scheme (see below) and the mitigation measures now proposed are considered unsubstantial and do not fully address the extent of harm identified although the view may be taken that the degree of harm is reduced from high to moderate overall.



2.9 The PDAS states that *"In the medium and long-term, the proposed mitigation planting around the boundaries of the Resubmission Scheme and alongside the PROW that cross the Site would be established and maturing. The planting would contribute to screening the Resubmission Scheme and integrating it with the landscape fabric such that it would be more compatible with the existing rural characteristics of views. The magnitude of impact experienced by receptors would therefore reduce with the exception of Viewpoint 8 at Mill Hill where due to the elevation, distance and angle of view the mitigation planting would not reduce the visual effect, with major to moderate adverse effects continuing in the medium and long-term"*. Whilst outside of my remit to comment further on landscaping, I am interested in the timescale described above as medium and long-term.

2.10 Although the proposed development would generate a large amount of electricity and would contribute towards reductions in carbon emissions and benefits for climate change thus contributing towards binding targets for the reduction of greenhouse gasses and improving the security of the UK's energy supply, there are concerns. In my opinion, if the scheme were to be reduced to that of the north-west field only i.e. closest to the Wymondley Transforming Station this would address the heritage harms identified in this response.

3.0 The Local Plan and NPPF (Dec 2024)

3.1 Policy HE1 of the North Hertfordshire Local Plan 2011 - 2031 is relevant as are the following paragraphs of the NPPF:

- **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*).

4.0 Planning and Design & Access Statement (October 2024) [hereafter 'PDAS']

4.1 The changes now proposed relative to the 2023 Scheme are as identified at 3.2.5:

- *Removal of the solar panels and infrastructure to the south of the Hertfordshire Way, with this area now replaced by species-rich grassland;*
- *The landscape bund by the southern boundary of Redcoats Farm has been removed and the solar panels and infrastructure moved away from this boundary and replaced with an intervening area of species rich grassland;*
- *Solar panels and fencing moved further west of Redcoats Farm and replaced with new woodland planting;*
- *Removal of an area of solar panels from the northwestern corner of the scheme, and additional woodland planting to soften views from residential properties at the edge of St Ippolyts;*

- Removal of one transformer station due to the reduction in area covered by the solar panels; and
- Further new woodland planting and grassland to mitigate impacts on wider landscape and openness alongside additional increases to biodiversity net gain. The overall increase in woodland planting between the current proposal and the 2023 Scheme is 2,950 m².

4.2 I specifically noted para 5.6.11 of the previous PDAS regarding St Ippolyts Conservation Area and the section I previously highlighted in that paragraph is now para 5.6.22 in the current PDAS and reads as:

*The Resubmission Scheme would not impact on any of the Key Views identified in the Conservation Area Character Statement and thus **it is concluded that the Resubmission Scheme would cause less than substantial harm to its setting**, and the setting of assets therein, in terms of the NPPF, which is consistent with the HIA conclusions for the 2023 Scheme.*

4.3 In terms of the impact upon the setting listed building I note paragraphs 5.6.23 to 5.6.33. There is commentary on the mitigation measures proposed to ameliorate concerns regarding the close setting of Redcoats Farmhouse (grade II*), small barn (east) to Redcoats Farmhouse (grade II), 'L' shaped barn (north-east) at Redcoats Farmhouse (grade II) and Granary at Redcoats Farmhouse (grade II) but little is made of the remaining wider impact of the proposal on the agricultural hinterland and setting of Almshoe Bury (grade I), Barn at Almshoe Bury (grade II) or The Wyck (grade II).

5.0 Heritage Impact Assessment (October 2024) AOC Archaeology Group

5.1 Previously, I considered the HIA (Oct 2021) prepared by AOC Archaeology Group under ref: 22/00709/FP. A fresh HIA has been prepared and at 1.2 the following is noted:

*The Resubmission Scheme includes the same scheme components as the 2023 Scheme but will have a **9% reduction in the area of panels compared to the 2023 Scheme** with the omission of numerous panel rows south of Redcoats Farm.*

5.2 Further on at 1.8 I do not fully concur with the comments that:

*Impacts on the settings of designated assets within 2km of the Resubmission Scheme have been considered. **Given the relatively limited intervisibility between the Site and surrounding heritage assets** due to intervening vegetation and proposed screening planting, this assessment anticipates that the Resubmission Scheme will have a neutral or no effect on the setting of most assets.*

5.3 It is considered that there is greater intervisibility between the site and the surrounding heritage assets than this report suggests but it is agreed that for most heritage assets identified within 2km of the application site, the impact of the Resubmission Scheme will have a neutral or no effect on the setting of most assets.

5.4 Paragraphs 1.9 and 1.10 of the HIA are of interest and I am unconvinced that the buffer zone south of the grade II* Listed Building Redcoats Farmhouse Hotel, its two grade II Listed Buildings barns and granary (Assets 6, 7, 8 and 9) would be sufficient to overcome my previous concerns. I acknowledged that the solar panels would be set back between 50m and 67m at the eastern and western ends of the southern boundary of the Redcoats complex, respectively, allowing for the open rural aspect south of the Robins and the

current experience of the ground falling away to be retained. However, in my opinion the impact on the setting of these assets remains and that their significance would still be significantly affected by the proposal. Paragraph 1.9 acknowledges that:

The solar panels (and associated fencing) have also been moved further away from the western curtilage of the Redcoats Farm complex and a new block of woodland planting is proposed in this location. The Resubmission Scheme will thus represent a change from arable farming use to solar energy generation in the wider setting of the farm complex and would reduce the overall proportion of agricultural land in the vicinity of the Redcoats farm complex. It is judged that the change would be adverse and that, therefore, harm would exist, however this harm would be limited and therefore in the context of the NPPF would be 'less than substantial harm', and towards the lower end of that scale.

- 5.5 Para 1.10 identifies heritage assets with the potential for impacts and whilst this is consistent with the previous proposal and **whilst I agree that these impacts would constitute less than substantial harm, this harm varies in my view from low to moderate rather than being considered at the lower end 'across the board' and is dependent upon distance and intervisibility together with the value of the asset (in some cases having a high heritage value).**

- 5.6 As before this new HIA recognises at 2.1.1 that:

The Site occupies three agricultural fields to the south of the hamlet of Redcoats Green, Little Wymondley, near Hitchin, Hertfordshire. The Site is centred on NGR: TL 20403 26447 (Figure 1). The Site is bound to the north by Stevenage Road and Sperberry Hill, to the west by Tittendell Lane and Little Almshoe Lane, to the south by Little Almshoe Lane and agricultural land and to the east by further agricultural land.

- 5.7 Introduced to this latest HIA is section 2.2 entitled 'Consultation Responses to the 2023 Scheme'. Whilst it is accepted that Historic England do not wish to raise objection to the previous scheme, Historic England have commented on the current proposal referring to their previous advice stating:

In our advice we considered that the establishment of a solar farm would fundamentally change the character and appearance of the wider historic setting of these heritage assets and detract from the way they are experienced and appreciated. We concluded that this would be likely to result in a level of harm in NPPF terms that we would judge to be less than substantial. We did accept, however, that it might be possible to mitigate the visual effects of the solar farm to some extent by way of appropriate planting/ augmentation of existing hedgerows to screen them from view.

*The Heritage Impact Assessment provided with the current application considers the impact on Redcoats Farm following the provision of additional landscaping and a 'buffer' area between the proposed solar panels and the complex in which the listed house and its listed barn sit. **It concludes that the impact would be reduced but that there would still be some harm. We would accept that conclusion.** The Assessment also confirms our view that there would be harm to the significance of Almshoe Bury and to the conservation areas at Wymondley, St Ippolyts (which includes the church) and Gosmore conservation areas. **In terms of the NPPF, such impacts would constitute less than substantial harm which the Assessment considers would be at the lower end of the scale. We would broadly accept these conclusions, although given the proximity of Redcoats Farm the harm might be slightly higher, though still 'less than substantial'.***

The latter, to an extent, supports my view that there would not be a blanket level of harm towards the lower end of the continuum across the whole of the development.

- 5.8 At 6.1.24 of the HIA it refers to the fact that the Redcoats complex has:

*historical relationship with land within Site as discussed within Section 5.4 and demonstrated on Figure 7 which shows that both Redcoats and the Site were owned by Edawrd Kitchiner in the 18th century and **these buildings all historically relate to the surrounding agricultural land which forms part of their wider agricultural setting in each case. The wider agricultural setting of each of these assets forms a key element of their settings and contributes to the understanding and appreciation of their significance and placement in the landscape in relation to nearby fertile land.** The surrounding land including the land within the Site is formed of large agricultural fields and there is little remaining evidence for the historic land division visible on early 19th century maps (Figures 7 and 8).*

- 5.9 At 6.1.25 the HIA goes on to mention the buffer zone south of Redcoats and that the “Resubmission Scheme will represent a change from arable farming use to solar energy generation in the wider setting of the farm complex and would reduce the overall proportion of agricultural land in the vicinity of the Redcoats farm complex. It is judged that the change would be adverse; therefore, harm would exist. However, it this considered that the harm would be limited and therefore in the context of the NPPF would be ‘less than substantial harm’, and towards the lower end of that scale”.

I am of the opinion that the degree of harm would generally be moderate and perhaps low in places.

- 5.10 With respect to the grade I Listed Building Almshoe Bury (Asset 31) and its grade II Listed Building barn (Asset 52) and The Wyck (grade II), para 6.1.26 concludes that:

..... On balance it is considered that views of the Resubmission Scheme would not substantially diminish the ability to appreciate the key relationship between the Listed Buildings and their agricultural hinterland, and as such any harm to their settings would be ‘less than substantial’ in terms of the NPPF.

Regarding impact upon their significance, I place the degree of harm from the proposal between the low to moderate range.

Mark Simmons
Senior Conservation Officer