

Response to Historic England Comments on Old Wood Energy Park, Land west of Bradmore Road and north of Wysall Road, Land west of Wysall, Wysall.

Planning Reference: 24/00161/FUL

On behalf of Exagen Development Ltd.

Date: 03.10.2024 | Pegasus Ref: P21-2553

Author: Rebecca Ward



Document Management.

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1	02.10.2024	Rebecca Ward Principal Heritage Consultant	Laura Garcia Senior Director (Heritage)	-
2	03.10.2024	Rebecca Ward Principal Heritage Consultant	Laura Garcia Senior Director (Heritage)	Client comments

1. Introduction

- 1.1. A planning application for Old Wood Energy Park has been submitted to Rushcliffe Borough Council under application reference number 24/OO161/FUL, validated on 16th February 2024.
- 1.2. The application is for the construction, operation and subsequent decommissioning of a renewable energy park comprising ground mounted Solar PV with co-located battery energy storage system (BESS) at the point of connection, together with associated infrastructure, access, landscaping and cabling on Land west of Bradmore Road and north of Wysall Road, Land west of Wysall, Nottinghamshire.
- 1.3. A consultation response was received from Molly Edwards, Inspector of Historic Buildings and Areas at Historic England on 13th March 2024.
- 1.4. The purpose of this note is to provide a summary of the discussions between Pegasus Group and Historic England as well as to set out additional information sent by Pegasus Group to Historic England following receipt of the consultation response. It is expected that once submitted to Rushcliffe Borough Council, Historic England will be reconsulted on this information and provided with an opportunity to provide updated comments on the application.

2. Response to Consultation Comments

- 2.1. A Heritage Statement considering archaeology and built heritage and including the results of a geophysical survey has been undertaken to provide an assessment of the proposed development upon the significance of identified heritage assets. The Setting Assessment within the Heritage Statement was undertaken by a heritage professional and followed the methodology recommended by the Historic England guidance *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3*.
- 2.2. Following submission of the planning application and Heritage Statement, a consultation response was received from Historic England. This raised concerns regarding the impact of the proposed development on designated heritage assets located in the surrounds of the site, comprising the following four designated heritage assets:
 - The Grade I Listed Holy Trinity Church;
 - The Grade II Listed Manor Farmhouse;
 - The Grade II Listed Highfields; and
 - Wysall Conservation Area.
- 2.3. The response noted that the full impact of the proposed development of these sites cannot be properly understood or assessed due to insufficient information.
- 2.4. It is important to note, the response did not state that there will be harm to these designated heritage assets, rather, further information was required.

- 2.5. Following receipt of this consultation response, Pegasus Group responded to Ms Edwards at Historic England on 11th April 2024, setting out further information regarding the four designated heritage assets raised by Historic England. This included the suggestion of a joint site visit in order to discuss these assets further, and visit the site and traverse the Public Rights of Way so that the impact of the development could be better understood.
- 2.6. A joint site visit was undertaken by Rebecca Ward, Principal Heritage Consultant of Pegasus Group and Molly Edwards of Historic England on Wednesday 28th August 2024, where the topography of the site and the location of the proposed development site was noted.
- 2.7. Following this site visit, Ms Edwards provided comments via email on 13th September 2024 that *'Historic England were more comfortable with the proposal'*. In the comments received following the site visit, Ms Edwards noted that *'the site was more enclosed than previously considered and site lines to and from heritage assets are more glimpsed and forced views from particular locations, including Wysall Conservation Area, Manor Farmhouse, Holy Trinity Church and Highfields'*. Ms Edwards also noted that it was *'positive'* that the existing field boundaries are to be retained.
- 2.8. In addition, within the email response following the site visit, Ms Edwards required clarification on additional matters, comprising the location of the BESS, the number and height of the lighting and CCTV, the justification and assessment of harm of the palisade and security fencing, and the height and impact of the panels.
- 2.9. All of the above factors were taken into consideration in the conclusions of the Heritage Statement. The Heritage Statement fully assessed the impact of the proposed development on the heritage significance of Wysall Conservation Area, the Grade I Parish Church of All Saints and the Grade II Listed Highfields. Manor Farmhouse was not considered for further assessment as part of the Heritage Statement, as initial assessment concluded that the land within the site did not contribute to the heritage significance of the asset, and there would be no harm to its overall heritage significance as a result of the proposed development. The Heritage Statement concluded that the proposed development within the southern parcel of the site would result in less than substantial harm at the lowermost end of the spectrum to the heritage significance of the Wysall Conservation Area, via an alteration to setting. The proposed development within the northern parcel of the site would result in no harm to the heritage significance of Wysall Conservation Area. Overall, the proposed development across the site would result in no harm to the heritage significance of the Grade I Listed Parish Church of All Saints and the Grade II Listed Highfields.
- 2.10. The majority of the fencing proposed across the site is deer fencing, which comprises a wooden pole and wire mesh stock fencing, which will reach approximately 2.5m in height. Palisade fencing is proposed in the area of the substation and the BESS, which will also reach approximately 2.5m in height. Wysall Conservation Area Appraisal identifies an *'important vista'* from the south-western extent of the Conservation Area, including glimpsed views of the southern southern parcel of the site. It is not anticipated that there will be views towards the palisade fencing from this area, but there are likely to be views of the deer fencing. Similarly, views of the deer fencing are anticipated from Highfields. In both scenarios, views of the fencing and panels will be seen in association with intervening agricultural land and vegetation. The landscape strategy proposes new hedgerows in front of the majority of the areas of fencing and panels, and existing hedgerows are also to be retained. Therefore, any visibility of the fencing and panels from heritage assets would be

short term (the expectation of mature hedges is between 5–10 years). There is no intervisibility between Manor Farmhouse and the site, and views of the Church from within the site comprise the tower only, with views out from the tower towards the site not easily accessible.

- 2.11. A response to Ms Edwards queries was sent by Pegasus Group on 16th September 2024, with the following additional information:

Why the BESS has been located where it has and why this is the most suitable?

The point of connection to the grid network is the overhead 132kV line that crosses the southern part of the southern parcel. The substation has been located as close as possible to this overhead line, being one field back from the pylon to benefit from the degree of screening afforded by some existing woodland particularly to the southeast. It is also one of the lower lying parts of the site topographically (but outside the flood zone), also to reduce visibility. The BESS has been located in a fenced compound adjacent to the substation to ensure it is as close as possible to the substation and point of connection to minimise electrical losses and to keep all such electrical infrastructure (which is not solar panels) in one part of the site. To build on the existing vegetation new planting is proposed as illustrated on the landscape mitigation plan. It also ensures that for construction of the BESS element all construction vehicles would access the site from the south and west avoiding short term traffic impacts on Wysall village.

The number and height of lighting and CCTV

Elevation drawings for these components are attached, they differ around the solar farm and the BESS/ Substation compounds. These drawings detail the size of the units. The solar farm has no perimeter lighting and the CCTV columns are up to 4 m in height located just within the perimeter fence. The BESS CCTV and lighting posts are a maximum height of 4 m. The locations of the CCTV are shown on the layout plan by the small yellow dots as shown in the key, approximately every 100 m along the perimeter fencing around the solar farm and slightly closer around the BESS and substation where they are generally in the corners of the compounds. These are visible if you zoom in on the site layout plan.

The justification and assessment of harm of the palisade/security fencing

I would note the majority of fencing on site is deer fence – wooden pole and wire mesh stock fencing. The only area with palisade fencing is around the substation and BESS in the southeastern part of the southern parcel. I'm not sure how visible this will be from heritage assets but they are a lesser height than the BESS containers and would be painted a sympathetic colour like the containers, e.g. dark green.

Why the panels are as high as they are and the impact of that?

The solar panels are arranged on mounting frames fixed to the ground. These frames generally take solar panels in landscape or portrait configuration – if in portrait there could be two panels or if in landscape there could be 4 panels. Depending on the height above the ground (minimum 0.8 m) and the tilt angle of the panel (between 10 and 35 degrees) the maximum height the panels would be would be 3.1 m (except a small area in the south of the northern parcel that is subject to flooding and has panels raised slightly to mitigate this, but these are in the topographically lower parts of the site so the increased panel height doesn't increased visibility above the rest of the solar panels). In most cases the

height of the panels would probably be around 2.8 m but planning consent is sought for up to 3.1 m. The panels are raised off the ground to ensure that sheep grazing can occur during the operational period, thereby retaining some agricultural function alongside clean energy generation and biodiversity enhancement. The panels at the height proposed have been assessed in the planning application, including the Heritage Statement.

- 2.12. Further clarification regarding the number and height of the lighting and CCTV was requested by Ms Edwards in an email on 20th September, and a response was sent across on 30th September 2024 and is summarised as follows:

With regards to the CCTV and lighting, the site is remotely operated and needs surveillance as there are no staff on site. The cameras around the solar farm (i.e. the greater length of fencing) would be located on posts just inside the fenceline, generally pointing down the gap between the fence and panels. I would repeat that there is no lighting associated with these poles, just infrared cameras. The cameras only have a particular range and in order to maintain sufficient coverage of the perimeter of the site they are needed at the density proposed. Furthermore where there are changes in the fenceline angles additional cameras are needed. I would also re-iterate that what is being proposed in terms of height and number are similar across all solar farms.

In terms of the BESS, again the cameras are to provide coverage of the BESS and substation compounds. They would be just inside the fence facing in to the compound and again the number needed is to ensure coverage is provided around the perimeter. These poles also have motion activated lighting though this would be very infrequently used – only when unscheduled emergency access is needed in the hours of darkness (most maintenance would be scheduled during daylight hours).

- 2.13. Ms Edwards also noted that she would make contact with the Conservation Officer for the scheme, in order to discuss the site and provide comments, as no comments have been received by the Conservation Officer to date. This information is still pending.

3. Conclusion

- 3.1. This note has set out the results of post-consultation discussions between Pegasus Group and Historic England, including initial responses to the consultation response, the results of a joint site visit and subsequent requests for further information.
- 3.2. With regards to the impact on designated heritage assets arising from the security fencing and height of the panels, this has been assessed as part of the Heritage Statement. With specific regards to views of the fencing and panels from the designated heritage assets, there is an 'important vista' from the south-western extent of the Wysall Conservation Area, including glimpsed views of the southern parcel of the site. It is not anticipated that there will be views towards the palisade fencing from this area, but there are likely to be views of the deer fencing. Similarly, views of the deer fencing are anticipated from Highfields. In both scenarios, views of the fencing and panels will be seen in association with intervening agricultural land and vegetation. The landscape strategy proposes new hedgerows in front of the majority of the areas of fencing and panels, and existing hedgerows are also to be retained. Therefore, any visibility of the fencing and panels from heritage assets would be short term (the expectation of mature hedges is between 5-10 years). There is no intervisibility between Manor Farmhouse and the site, and views of the Church from within the site comprise the tower only, with views out from the tower towards the site not easily accessible.



Appendix 1: Historic England Response – 13th March 2024



Historic England

Mr Gareth Elliott



Rushcliffe Borough Council

Civic Centre

Our ref: P01573192

Pavillion Road

West Bridgford

Nottingham

NG2 5FE

13 March 2024

Dear Mr Elliott

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND WEST OF BRADMORE ROAD AND NORTH OF WYSALL ROAD, LAND
WEST OF WYSALL, WYSALL
Application No. 24/00161/FUL**

Thank you for your letter of 22 February 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Significance

Holy Trinity Church retains fabric from the 12th century suggesting it dates to at least that time, however, the building has been adapted across multiple phases from the 13th to the 19th century. The interior has a roof of great architectural and historic





interest, dating wholly from the 15th century and of two different roof forms, both well-made. Externally, the church has undergone some alterations, most obviously to the roof structure. Holy Trinity is set within a key location of the village and its immediate environs are built up with soft landscaping and strong connecting views across the settlement. Beyond its individual significance the contribution it makes to the settlement is high. The 13th century tower is a primary focal point and key landmark both within and from the wider surrounding landscape. Its primarily rural setting is a key contribution to the church's overall significance. For these reasons, as well as others, the building has been listed Grade I, within the top 8% of all listed buildings in England.

Manor Farmhouse to the west of the settlement is primarily 17th to 18th century yet is likely to have had an earlier phase evidenced by a stair turret and older fabric. The principal structure has architecturally interesting brick diaper work and is set on a stone plinth. For these reasons, among others, the building has been listed Grade II.

As well as Manor Farmhouse, Highfields is to the west of the main settlement and likely to be of 18th century origins. Historically associated with the Holy Cross Convent and Sir Thomas Parkyns of Bunny Hall, Highfields has been described as 'intriguing building with unusual features' in the Nottingham Pevsner. The setting of the property contributes highly to its significance as documentary evidence describes the use of a balcony on the roof to enjoy the wide-ranging views across the rural landscape. For these, and other reasons, the building has been listed Grade II.

Wysall Conservation Area, designated in 1990, is an attractive rural village of which a key characteristic is the connection with the open countryside provided by views to and from the settlement as well as the rural approaches along tree and hedge-lined routes. Furthermore, views along the northern approach are identifiable and deemed a significant contributor to the conservation area's rural character. The village's wider landscape setting is predominantly arable fields.

Impact

The full impact of the proposed development of these sites cannot be properly understood or assessed due to insufficient information. The significance of Holy Trinity Church, Wysall Conservation Area and Highfields are contributed to by their connection with the rural, open landscape which surrounds the settlement. The understanding of the interconnecting views between these sites, as well as the wider landscape through which the church tower can be viewed and appreciated have not been suitably assessed. Furthermore, due to its position on the edge of the settlement, Manor Farmhouse has the potential for interconnecting views across the open landscape which could contribute to its setting.

Policy





The relevant NPPF (National Planning Policy Framework) policies include:

200. 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.

201. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

205. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

211. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

Further policies include local policy 2/12 Historic Character:

Local planning authorities will protect and enhance the historic and architectural character and appearance of the landscape of the Plan Area. Permission will not be granted for development within Historic Parks and Gardens, Historic Battlefields and other areas designated for special protection except where it demonstrably conserves and enhances the characteristics of these areas. The protection and enhancement of the historic character will be achieved through:

a) the protection and maintenance of buildings listed as of special architectural,





historic or landscape importance, including their settings;

b) the identification, protection and maintenance of other individual and groups of buildings which are important for their local architectural distinctiveness, or significance;

c) the identification, maintenance and enhancement of other locally distinctive and culturally important aspects of the historic environment;

d) the designation, enhancement and preservation of Conservation Areas and their settings;

e) sensitively designed environmental improvement and traffic management schemes in Conservation Areas and other appropriate areas;

f) finding appropriate alternative uses for, and the restoration of, listed or other buildings worthy of retention; and

g) informed design of new development.

Position

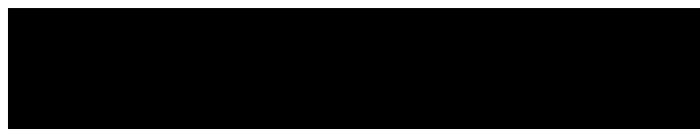
Historic England have concerns regarding the proposed development due to the potential visual impacts on the setting of Holy Trinity Church, Wysall Conservation Area, Highfields and Manor Farmhouse; these buildings also gain much of the significance from their setting as from their architectural and historic interest. Increased assessment of the impact of the development should be provided as well as suitable photographs for assessment. In this regard we find the assessment of harm within paragraph 6 of the Heritage Statement is not supported by the provided information.

We refer you to the guidance set out in Planning Note 3 The Setting of Heritage Assets: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/>

We refer you to your archaeological advisor for guidance on appropriate pre-determination desk-based assessment, geophysical surveys and intrusive trenching assessments.

Further relevant guidance includes:

Historic England Advice Note 13: Commercial Renewable Energy Development and the Historic Environment: <https://historicengland.org.uk/images-books/publications/commercial-renewable-energy-development-historic-environment->





advice-note-15/heag302-commercial-renewable-energy-development-historic-environment/

Historic England Advice Note 17: Planning and Archaeology:

<https://historicengland.org.uk/images-books/publications/planning-archaeology-advice-note-17/heag314-planning-archaeology/>

Historic England Guidance; Deposit Modelling and Archaeology:

<https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/heag272-deposit-modelling-and-archaeology/#:~:text=This%20guidance%20is%20written%20to,characterise%20deep%20sequences%20of%20deposits>

Recommendation

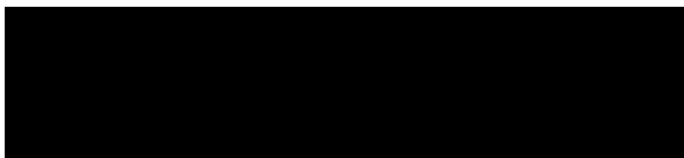
Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 200, 201, 205 and 211 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess, section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas, and section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Molly Edwards



Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Cambridge

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