



Historic England

Ms Katherine King  
The Planning Inspectorate  
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Bristol  
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Direct Dial: 01223 582716

Our ref: PL00726022

9 December 2020

Dear Ms King

**LONGFIELD SOLAR FARM: REQUEST FOR SCOPING OPINION,  
CHELMSFORD/BRAINTREE BORDER, ESSEX  
App: EN010118LSF**

Thank you for consulting us on 6 November 2020 regarding an EIA Scoping Opinion for the Longfield Solar Farm, which would be located within the administrative areas of Braintree District Council and Chelmsford City Council. The Scheme comprises the installation of solar photovoltaic (PV) generating panels and on-site energy storage facilities across a proposed site in Essex, together with grid connection infrastructure. The Scheme would allow for the generation, storage and export of up to 500 megawatts (MW) electrical generation capacity. At this stage the maximum extent of land that would be included within the application for a Development Consent Order.

This development could potentially have an impact on designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

The comprehensive Scoping Report produced by Aecom shows that there are no designated heritage assets within the site boundary. Within the 3km Study Area there are six grade I listed buildings, 18 grade II\* and 251 grade II listed buildings. There are three Scheduled Monuments within 3km of the Site; Great Loyes moated site, Gubbion's Hall moated site and Hatfield Priory, together with four registered parks and gardens, Hatfield Priory, Terling Place, New Hall, Boreham and Boreham House. Terling Conservation Area and Boreham Conservation Area are also within 3km of the site.

We note that the extent of the Study Area allows for all heritage assets to be set within their wider context so that they can be properly assessed. It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this. We consider the Landscape and Visual Amenity matters covered in section 10 of the



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Report adequately set out the level of assessment that will be undertaken in relation to the impact of these major development proposals.

We recommend that conservation staff at Chelmsford City Council and Place Services, who provide conservation advice to Braintree District Council, together with the archaeological staff at the County Council are involved in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments. Key sites and setting issues will need to be addressed within the EIA.

Assessments of setting should not be restricted to visual impact, the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area should also be assessed.

The assessment should be carried out in accordance with established policy and guidance, including the National Planning Policy Framework. The Planning Practice Guidance contains guidance on setting, amplified by the Historic England document *Historic Environment Good Practice Advice in Planning Note 3 The Setting of Heritage Assets*, which provides a thorough discussion of setting and methods for considering the impact of development on setting, such as the use of matrices.

Whilst standardised EIA matrices or are useful tools, we consider the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems. Historic England therefore recommends that these should be seen primarily as material supporting a clearly expressed and non-technical narrative argument within the *Historic Environment* chapter. The EIA should use the ideas of benefit, harm and loss (as described in the NPPF) to set out 'what matters and why' in terms of the heritage assets' significance and setting, together with the effects of the development upon them.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of





alterations to drainage patterns that might lead to *in situ* decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

We would also expect the Environmental Impact Assessment to consider the potential impacts on the non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record ([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)) and relevant local authority staff. The EIA should define the nature, extent and significance of these assets in order to assess the impact from the proposed development.

The applicants should demonstrate that as part of the EIA process they have explored alternative sites for the proposed solar farm, with a view to minimising the level of harm the scheme would cause to designated and undesignated assets in the historic environment.

We should like to stress that this response is based on the information provided in this consultation. For the avoidance of doubt, this does not affect our obligation to provide further advice and, potentially, to object to specific proposals which may subsequently arise where we consider that the scale, massing and detailed design would have an adverse effect upon the immediate and wider historic environment.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,

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