

Summary of WRs

The enclosed document provides Historic England's Written Representations. This includes our comments on the ES Chapter for the historic environment and the Cultural Heritage Technical Appendix specifically relating to the methods and assessment of significance of designated heritage assets, including the contribution of setting to this significance, and the potential impact of the DCO scheme upon this significance.



Historic England

WRITTEN REPRESENTATIONS

ON BEHALF OF THE

HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND

(HISTORIC ENGLAND)

Interested Party Ref No:

20050722

Helios Renewable Energy Project (Reference No.

EN010140)

Application by

Enso Green Holdings D Limited

1. Introduction

- 1.1. The Historic Buildings and Monuments Commission for England is generally known as “Historic England”.
- 1.2. It was established with effect from 1 April 1984 under Section 32 of the National Heritage Act 1983. The general duties of Historic England under Section 33 are as follows:

“...so far as is practicable:
 - (a) to secure the preservation of ancient monuments and historic buildings situated in England;
 - (b) to promote the preservation and enhancement of the character and appearance of conservation areas situated in England; and
 - (c) to promote the public’s enjoyment of, and advance their knowledge of, ancient monuments and historic buildings situated in England and their preservation”.
- 1.3. We also have a role in relation to maritime archaeology under the National Heritage Act 2002 and advise Government in relation to World Heritage Sites and compliance with the 1972 Convention Concerning the Protection of the World Cultural and National Heritage.
- 1.4. Historic England is a statutory consultee on all Nationally Significant Infrastructure Projects.
- 1.5. We have been notified by you of the acceptance of the DCO application and have registered as an Interested Party.

- 1.6. Historic England's interest in this scheme is focused on the following designated heritage assets in relation to the requirements of NPS EN-1 and the NPPF.

2. Archaeology and Built Heritage

- 2.1. The proposed site of this DCO is in close proximity to three designated heritage assets of note which are Camblesforth Hall (Grade I), Carlton Towers (Grade I), and Manor Farmhouse (Grade II). We will focus on the two Grade I listed buildings, and would expect that the local planning authority will address any issues relating to the Grade II listed building.
- 2.2. The Cultural Heritage Technical Appendix [[EN010140/APP/REF/6.3.6.1] provides a table summarising the significance of approximately 77 heritage assets, including the potential impact upon this significance, however Historic England's interest in the DCO relates specifically to the two Grade I listed buildings Camblesforth Hall and Carlton Towers, as identified as points of interest in our pre-application advice. This is in part due to their high grading and in part due to their physical proximity to the proposal site.
- 2.3. We understand that archaeological matters have been agreed with the Local Authority's archaeological advisors and Historic England have no comments to make on this.
- 2.4. In Historic England's pre-application advice we outlined our expectation that the ES would be accompanied by a Heritage Impact Assessment which would articulate a robust understanding of the buildings' significance and the contribution of setting to this significance.
- 2.5. The Applicant has employed two documents to fulfil this expectation. These are the ES chapter on Cultural Heritage [EN010140/APP/6.1.6] accompanied by Appendix 6.1 Cultural Heritage Technical Appendix [EN010140/APP/REF/6.3.6.1].

- 2.6. Whilst not in the form of a singular HIA document, these documents have assessed the significance of the designated heritage assets, including the contribution of setting to this significance, and the impact of the proposed scheme upon this significance thereby carrying out the expected assessments in lieu of a single Heritage Impact Assessment.
- 2.7. The success of the approach and methodologies used will be discussed below in Section 3: Methodology.

3. Methodology

- 3.1. We consider that the approaches outlined in the ES relating specifically to the historic environment are acceptable. These methodologies and approaches as described in Environmental Statement [EN010140/APP/6.1.6], and Appendix 6.1 Cultural Heritage Technical Appendix [EN010140/APP/REF/6.3.6.1] are as follows:
- 3.2. Environmental Statement [EN010140/APP/6.1.6]
- 3.2.1. The ES chapter has sought an extensive list of guidance and historic environment resources/records consulted, as shown in paragraph 6.3.9. We consider it beneficial that in reference to general Environmental Statement methodology that Historic England's Advice Note 15 Commercial Renewable Energy Development and the Historic Environment (February 2021) was used as a baseline [EN010140/APP/6.1.6]
- 3.2.2. The methodology for identifying and assessing levels of harm has been clarified to ensure that the assessment is in line with EIA requirements and in NPPF terms. In paragraphs 6.3.13 and 6.3.20 it describes the method of how a matrix of significance, or value, and magnitude of impact have been employed for the purpose of the EIA however this has been supplemented using

professional judgement, acknowledging the potential shortcomings of just using a matrix based system. Additionally, to further address the potential shortcomings of the matrix system used in the EIA, in para 6.3.21, it describes the assessment method used to link the impact on significance in NPPF terms, i.e. substantial, less than substantial etc. [EN010140/APP/6.1.6]. This clarification is important for understanding the significance of designated heritage assets, the contribution of setting to this significance, and the potential impact of the proposal upon this significance and therefore Historic England supports this clarification. Furthermore, Historic England agrees with the assessments of significance/impact and the conclusions drawn from these assessments for Camblesforth Hall and Carlton Towers.

3.2.3. Therefore the above sections have demonstrated that a clear and comprehensive methodology has been used to identify significance, including the contribution of setting to this significance, and aligned the different terminologies used across different documents to ensure this clarity.

3.2.4. In section 6.4 the cultural heritage baseline is established to take a holistic view on cultural heritage and archaeological designated heritage assets to articulate their relative significance and the contribution of setting to this significance.

3.2.5. The impact of the proposed DCO scheme upon this significance is then subsequently assessed in a consistent method.

3.2.6. Paragraph 6.5.1 outlines how the baseline has evolved throughout the EIA Scoping and ES stages which have amount to the ES demonstrating an archaeological mitigation strategy, agreed

by the LPA, mitigation strategies for built heritage, namely the highly graded heritage assets and the most pertinent heritage receptors, through reinstating historic field boundaries, moving the array and increasing visual screening buffer zones.

3.2.7. This consistent method of assessing significance impact is laid out in paragraphs 6.5.1 - 6.9.3 (sections 5, 6, 7, 8, and 9) building upon the established cultural heritage and archaeological baseline. The ES also assesses the impact of construction phase, operational, and decommissioning phases to assess the potential impact on significance, particularly focused on Cambleforth Hall and Carlton Towers. This is done by assessing: the likely significant effects, mitigation measures, the likely residual effects, and the cumulative effects. In each of these headings it looks at the construction phase, operational phase, and decommissioning phase.

3.2.8. Historic England agrees that this method is acceptable and that the conclusions drawn from it, relating to Camblesforth Hall and Carlton Tower, are similarly acceptable.

3.2.9. The assessment of the impact is supported by photographs which offer views which demonstrate an understanding of views as you pass through the landscape including views to and from the heritage assets and the proposal site.

3.2.10. In light of this information provided, some impact to the significance of Camblesforth Hall will arise from development within its setting. Due to the topography, mitigation strategies and tree planting, this would cause a minimal impact upon the significance of the Hall via its setting. The closest built part of the scheme would be separated from the designated heritage asset by modern

residential dwellings, a road, and trees. The photographs evidence that whilst glimpsed views of the Hall from a public right of way are possible, there would be no views where the Hall and the development site are intervisible from this public right of way.

3.2.11. Regarding Carlton Towers, the designated heritage asset and its curtilage are largely surrounded by trees and are 1.5km away from the nearest element of new building for the DCO Site. It is acknowledged that views from the top of the clock tower would incorporate elements of the new scheme however we agree that the clock tower's significance lies more with views of it rather than from it.

3.2.12. For both designated heritage assets we agree with the conclusions of the ES chapter and Cultural Heritage Technical Appendix that this harm would amount to a low level of less than substantial harm.

3.3. Appendix 6.1 Cultural Heritage Technical Appendix

[EN010140/APP/REF/6.3.6.1]

3.3.1. The Cultural Heritage Technical Appendix [EN010140/APP/REF/6.3.6.1] has been created by the applicant to create a heritage baseline on which the Environmental Statement [EN010140/APP/6.1.6] would base its cultural heritage chapter upon.

3.3.2. This was in line with suggestions from the Inspectorate in the Environmental Statement Appendix 2.2: Scoping Opinion document [EN010140/APP/6.3.2.2] as well as Historic England's pre-application advice which stated that a satisfactory Heritage Impact Assessment would be carried out.

3.3.3. A Heritage Impact Assessment has not been submitted as a singular document in response to this however a consistent assessment in line with an appropriate methodology has been submitted in the form of the ES Chapter and Cultural Heritage Technical Appendix.

3.3.4. Historic England consider that this expectation, in our opinion, has been satisfied and that the assessment has clearly articulated the significance of the designated assets most likely to be affected by this DCO scheme and the contribution that setting makes to the setting. This has been based on Historic England guidance on 'The Setting of Heritage Assets'.

3.3.5. The Cultural Heritage Technical Assessment has assessed several other designated heritage assets' significance within a 3km radius amounting to approximately 77 designated heritage assets. The document also provided justification for the omission of a more detailed assessment within the ES. Our focus is on the two Grade I listed buildings identified at pre-application stage.

3.3.6. The 75 assets identified, other than Camblesforth Hall and Carlton Towers, include two conservation areas, four scheduled monuments, five Grade I listed buildings. Historic England have identified two Grade I listed buildings of concern at pre-application stage which are Camblesforth Hall and Carlton Towers. These other highly graded assets are of the highest significance hence their inclusion within the assessment in the ES Chapter. These have been assessed against a methodology which we agree with and largely due to their relatively large distance away from the proposal site, the impact upon this significance is considered to be low or nil. Therefore, we agree with the assessment made in the ES chapter relating to the impact, or lack thereof, on the significance of the other highly graded designated heritage assets in this chapter.

3.3.7. Additionally, in paragraphs 6.3.9 - 6.3.22, the document further clarifies the terminology surrounding significance and impact between EIAs and NPPF/NPS EN-1 terms.

3.3.8. For example, Table 6.1 outlines the 'criteria for establishing value/sensitivity' which identifies the relative significance level of

heritage assets as High, Moderate, Low, or No Heritage Significance.

3.3.9. Table 6.2 outlines the 'Criteria for Establishing Level of Impact/Change' which categorises levels of impact in terms of 'High', 'Medium', 'Low', 'Negligible' and 'No Change'.

3.3.10. Table 6.3 'Significance of Effect' combines the above two tables to compare the 'value/sensitivity of heritage asset' against the 'magnitude of impact' producing an overall assessment from 'neutral', 'minor', 'moderate' to 'major' effects.

3.3.11. The use of these matrixes is often not supported when used in isolation.

3.3.12. 6.3.20 states:

In accordance with the requirements of the EIA Regulations, this assessment has assessed the significance of effects resulting from the Proposed Development's impacts; however, NPS EN-1 considers impacts in terms of levels of harm or loss to the significance of an asset from a proposed development. A significant effect identified in this assessment would not necessarily equate to a finding of substantial harm, as defined in the NPS EN-1. Equally, a less significant effect identified in this assessment may result in a higher level of harm according to the NPS EN-1. Professional judgement has been used throughout this assessment to ensure that where a matrix-based system has been employed (as set out in Table 6.3), a robust assessment of the potential significance of the effect (in EIA terms) to the heritage asset has been reported within this assessment.

3.3.13. This acknowledgement and clarification over assessing significance and impact and meeting the requirements of different application types is an important one. It has made it clear on what the significance is of the designated heritage assets, the contribution of their setting to this significance, the impact considered to arise from the scheme upon this significance, including at all stages of the development from construction to decommissioning. We agree that this is an appropriate

methodology for the assessments of significance and impact to be carried out by.

4. Summary and Conclusion

- 4.1. Overall, the Environmental Statement [EN010140/APP/6.1.6] and Appendix 6.1 Cultural Heritage Technical Appendix [EN010140/APP/REF/6.3.6.1] has provided an acceptable and consistent assessment of significance and impact, albeit not in the form of a singular Heritage Impact Assessment which was outlined within Historic England's pre-application advice.
- 4.2. This assessment was expected to include a consistent and robust assessment of the significance of the designated heritage assets, and the contribution setting makes to this significance. It was also expected to include an assessment of the impact the DCO scheme would have upon this significance, identifying whether this harm could be avoided, mitigated or reduced.
- 4.3. Based upon this baseline of significance, they have used a consistent methodology to assess the potential impact of the development at construction, operational, and decommissioning phases. Within this they have sought to establish: the likely significant effects, mitigation, and likely residual effects.
- 4.4. Where the other 75 assets are within a zone of interest, the Applicants have created a table to justify their absence from the main ES chapter. The Applicants have assessed the significance and impact to justify their absence from the main ES Chapter text.
- 4.5. Therefore, the significance of the most sensitive heritage receptors, and the contribution of setting to the significance, has been adequately assessed, in our opinion.

4.6. We are content that they have approached the assessment in accordance with the relevant requirements, that we broadly agree with the conclusions they have come to on the level of impact that would arise, and that we consider that the safeguards for dealing with the impact can be appropriately dealt with through the proposed design and conditions of the DCO.

4.7. Overall, Historic England has no further concerns relating to the impact on the significance of the two Grade I listed buildings highlighted in our pre-application advice as being points of potential concern. The Applicant has provided an assessment of significance and impact in the form of the ES Chapter and Cultural Heritage Technical Appendix in lieu of the expected HIA. We agree to the methodology used as well as the conclusions drawn from them – relating specifically to Camblesforth Hall and Carlton Towers.