
EAST YORKSHIRE SOLAR FARM

**East Yorkshire Solar Farm
EN010143**

**Applicant's Additional Responses to heritage matters raised by
Written Representations [REP1-119] and [REP1-103] Submitted
at Deadline 1**

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1. Introduction

1.1 Purpose of this document

- 1.1.1 The Development Consent Order (DCO) application (the Application) for East Yorkshire Solar Farm was submitted on 21 November 2023 and accepted for Examination on 19 December 2023. Deadline 1 of the Examination was on 18 June 2024.
- 1.1.2 On 10 July 2024 Issue Specific Hearing 2 (ISH2) on Environmental Matters was held by the Examining Authority at the Parsonage Hotel, Escrick. At ISH2 the Examining Authority requested that the Applicant prepare a post hearing note regarding whether the effect on non-designated heritage assets has been adequately assessed to respond in more detail to the matters raised in a Written Representation received at Examination Deadline 1 from Mr David Pinnock-Humble [REP1-119].
- 1.1.3 This document provides additional responses from the Applicant to the following Written Representations regarding heritage matters submitted at Deadline 1:
- a. David Pinnock Humble [REP1-119]; and
 - b. Brian Birkett [REP1-103].
- 1.1.4 These Written Representations are presented as verbatim text (unless indicated otherwise) and are then responded to by setting out the Applicant's position on the matter at the time of writing.
- 1.1.5 The reference number column in the tables below refers to the reference given to the Written Representations made by the Interested Parties.
- 1.1.6 The documents submitted with the Application are also referenced in this document, using the reference number e.g. [APP/x.y], where the last two/three numbers are the application document number, as set out in the Examination Library. All documents are also presented in numerical order in the Guide to the Application [REP1-002].
- 1.1.7 For ease of reference, a table of acronyms used in this document is provided in Table 1-1. of this document.

Table 1-1. Abbreviations

Abbreviation	Definition
DBA	Desk Based Assessment
DCO	Development Consent Order
ERYC	East Riding of Yorkshire Council
ES	Environmental Statement
GNSS	Global Navigation Satellite System
HER	Historic Environment Record

Abbreviation	Definition
PV	Photovoltaic
RTK	Real-time Kinematic

2. Applicant's Additional Responses to heritage matters raised by Written Representation [REP1-119] and [REP1-103] Submitted at Deadline 1

Table 2-1. Applicant's Additional Responses to heritage matters raised by Written Representation [REP1-119] and [REP1-103] Submitted at Deadline 1

Examination Library Ref	Name	Comment	Applicant's Response at Deadline 3
REP1-119	David Pinnock Humble	<p>1. Inadequate identification of non-designated heritage assets (NDHAs) that are not included in the Humber Historic Environment Record whose significance may be harmed by the proposals</p> <p>In the NPPF 'heritage assets' are a broad category that includes both designated heritage assets (such as listed buildings or scheduled monuments) and non-designated heritage assets (NDHAs):</p> <p>'Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).' (NPPF Glossary)</p> <p>It is the applicant's responsibility to describe the significance of any heritage assets that may be affected by the proposals. This includes NDHAs. Consulting the relevant Historic Environment Record (HER) is a minimum requirement:</p> <p>'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.' (NPPF paragraph 200).</p> <p>The government's Historic Environment Planning Practice Guidance (PPG) makes clear that NDHAs are not restricted to the buildings/features contained in the relevant HER (in this case the Humber HER for the most part. Small parts of the scheme are within the North Yorkshire HER area and these comment apply equally in both areas). In fact they can be identified in several different ways, including during the application process. Although local authorities are encouraged to compile a local list, this is not a requirement. East Riding of Yorkshire Council do not maintain a local list:</p> <p>'How are non-designated heritage assets identified?</p> <p>There are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence.</p>	<p>The Applicant considers that all relevant non-designated heritage assets whose significance could be harmed by the proposal have been identified. The process for identifying heritage assets was not restricted to consultation of the HER; rather, it used sources of information and followed a methodology that was agreed with cultural heritage statutory consultees, comprising the Archaeology and Conservation Officers for North Yorkshire County Council and East Riding of Yorkshire Council and the officer from Historic England during formal EIA Scoping and engagement.</p> <p>The data sources, detailed in section 3.2 of the Cultural Heritage Desk-based Assessment (DBA) [APP-080] and paragraph 7.4.15 of Chapter 7: Cultural Heritage of the Environmental Statement (ES) [REP2-006], are listed below for reference, and the record of agreement with the statutory consultees, including the gathering of data from additional thematic assessment and fieldwork survey, is documented in Table 7-2 of Chapter 7 of the ES [REP2-006]. Data sources comprised:</p> <ol style="list-style-type: none"> Results from a programme of archaeological geophysical survey and trial trench evaluation presented in [APP-081] and [REP1-018]; Formal searches of the Humber Historic Environment Record (HER) and North Yorkshire HER, including the Historic Landscape Characterisation data for both areas and for spatial and non-spatial data on heritage assets and previous archaeological investigations; Published and unpublished literature (including a detailed review of reports for previous fieldwork carried out within proximity to the Order limits); Documentary, cartographic and other resources as deposited within the local archives; The National Heritage List for England, held by Historic England, for designated heritage assets; Local authority conservation area appraisals and management documents and their mapping; Various online resources listed in Annex A of the DBA [APP-080] and section 7.11 of the ES [REP2-006]; Heritage Gateway for former National Monuments Record and excavation index data; National Library of Scotland for historic Ordnance Survey maps and The Genealogist for tithe maps; Defence of Britain Archive database;

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	<p>Plan-making bodies should make clear and up to date information on non-designated heritage assets accessible to the public to provide greater clarity and certainty for developers and decision-makers. This includes information on the criteria used to select non-designated heritage assets and information about the location of existing assets.</p> <p>It is important that all non-designated heritage assets are clearly identified as such. In this context, it can be helpful if local planning authorities keep a local list of non-designated heritage assets, incorporating any such assets which are identified by neighbourhood planning bodies. (See the Historic England website for advice on local lists) They should also ensure that up to date information about non-designated heritage assets is included in the local historic environment record.</p> <p>In some cases, local planning authorities may also identify non-designated heritage assets as part of the decision-making process on planning applications, for example, following archaeological investigations. It is helpful if plans note areas with potential for the discovery of non-designated heritage assets with archaeological interest. The historic environment record will be a useful indicator of archaeological potential in the area.' (Paragraph: 040, Historic Environment PPG). Historic England recommended at an earlier stage in the present application that: 'We would also expect the ES to consider the potential impacts which the proposals might have upon those heritage assets which are not designated' (Table 7-2. Statutory consultation responses, Environmental Statement: Volume 1, Chapter 7: Cultural Heritage).</p>	<p>k. Vertical aerial photography of the study area available from the National Collection of Aerial Photographs;</p> <p>l. Available 1 m and 2 m spatial resolution LiDAR data published by the Environment Agency;</p> <p>m. Archaeology Data Service for information on previous cultural heritage assessments and fieldwork surveys;</p> <p>n. Information and guidance deriving from consultation with the Archaeology and Conservation Officers for North Yorkshire County Council, the East Riding of Yorkshire Council and Historic England; and</p> <p>o. Information gathered from the walkover survey and setting assessment of the Order limits and Study Area.</p>
<p>REP1-119</p> <p>David Pinnock Humble</p>	<p>The applicant outlines their methodology for identifying NDHAs in their response to Historic England's comment in Table 7-2, as well as in their Data Sources section (paragraph 7.4.15-16 also paragraph 7.5.5 Environmental Statement: Volume 1, Chapter 7: Cultural Heritage). The methods comprise the consultation of the relevant HERs and a site walkover.</p> <p>In the case of such a large development with the potential to affect such a large area, it is not adequate to simply consult the HER only. This is a minimum requirement in the NPPF, and an application of this sort demands greater than the minimum requirement. The applicant seems to realise this as they also acknowledge that they attempted to identify additional NDHAs through walkover survey.</p>	<p>This statement is incorrect.</p> <p>The methodology for identifying non-designated heritage assets was not limited to consultation of the HER and a site walkover survey. The identification of heritage assets that may be impacted by the Scheme resulted from consultation of all the data sources listed in section 3.2 of the Cultural Heritage DBA [APP-080] and paragraph 7.4.15 of Chapter 7: Cultural Heritage of the ES [REP2-006].</p>
	<p>However the site walkover was restricted to the areas within the proposed solar farm block ('fields within the Order limits in order to identify known and previously unknown heritage assets'), and does not seem to have sought to identify any NDHAs that lay outside the boundaries of the solar farm blocks and/or in land that is not 'fields'. There is no justification for this exclusion, which appears arbitrary. The applicant does assess (however inadequately, see below) the impact on NDHAs identified in the HER outside the site boundaries, but for some reason does not seem to have sought to find hitherto unidentified NDHAs outside the site boundaries.</p>	<p>The statement that the site walkover was restricted to the Solar PV Areas is incorrect. Section 3.3 and 4.3.1 of the DBA [APP-080] and section 7.4.16 of the ES [REP2-006] confirms that the site walkover was carried out within the Order limits and the Study Area, which comprises a 1 km area around the Order limits. Section 3.3.1 of the DBA further details that one of the aims of the site walkover was to, 'identify known and previously unknown heritage assets within the Site and Study Area, including non-designated buildings of heritage interest not recorded on the HER'.</p>

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REP1-119 David Pinnock Humble	<p>Paragraph 7.5.7 (Environmental Statement: Volume 1, Chapter 7: Cultural Heritage) implies that only one NDHA building (or group of NDHA buildings) was identified through walkover or from any source that was not the HER. This shows the inadequacy of the applicant's approach.</p> <p>Documentary, cartographic and other resources available online and as deposited within the local archives are mentioned as having been consulted but I can find no evidence that these have been used to identify NDHA buildings. A simple methodology for example might have been to compare the mid-nineteenth century Ordnance Survey maps with their equivalent present day maps to establish which buildings pre-date the 1850s, which would then merit consideration as NDHAs. I have done this below in some of my examples but I can find no evidence that the applicant has deployed even this most basic methodology.</p> <p>In national policy, the bar for qualification as a NDHA is set relatively low. On the face of it within the area that will be affected by the proposals there are a number of buildings that could be NDHAs, but which are not recorded in the HER. The applicant has made no effort to identify these, to assess their significance, and to consider the impact of the proposed development on their significance. This is an egregious omission especially since Howdenshire is characterised by the excellent survival of historic farmsteads of high and low status, many of which are extremely well-preserved.</p>	<p>As part of the agreed assessment methodology, if features and buildings of heritage interest were identified within the Order limits and/ or Study Area, and where it was assessed there was potential for change to their heritage value as a result of the Scheme, they were included in the DBA and ES.</p> <p>This assessment methodology resulted in the identification of non-designated heritage assets within the Order limits, such as AEC005 Johnson's Farm, and non-designated heritage assets in the Study Area including, AEC002 Drax Abbey Farm and AEC003 Old Lodge, which are described in section 4.3: Site Walkover of the DBA [APP-080].</p> <p>The inference that only one non-designated heritage asset, not on the HER, was identified during the assessment is incorrect. Paragraph 7.5.7 of the ES refers to one group of non-designated buildings likely to be impacted by the Scheme, which was identified during the site walkover within Solar PV Area 1e, namely, AEC005 Johnson's Farm. The paragraph is not concluding that only one non-designated heritage asset was identified by the assessment. Documentary and map evidence were consulted as part of the baseline assessment and are listed as data sources in section 3.2 of the Cultural Heritage DBA [APP-080] and paragraph 7.4.15 of Chapter 7: Cultural Heritage of the ES [REP2-006]. Section 4.3 of the Cultural Heritage DBA [APP-080] describes non-designated heritage assets, not recorded on the HER, that were identified in the Study Area, including AEC001 Ave Maria Lane, AEC002 Drax Abbey Farm, and AEC003 Old Lodge. The DBA also states at paragraphs 4.3.19 and 4.3.20 that these features appear on the first edition Ordnance Survey map, dated 1855.</p> <p>The process for identifying non-designated features of potential heritage interest started at an early stage of the DBA process and, in line with the data sources listed in section 3.2 of the Cultural Heritage DBA [APP-080] and paragraph 7.4.15 of Chapter 7: Cultural Heritage of the ES [REP2-006], compared first edition Ordnance Survey maps and tithe maps, if the latter was available, with modern aerial imagery. During this early stage of assessment, if a building or structure showed no change from the first edition Ordnance Survey map when compared with aerial imagery, and it had the potential to experience significant effects as a result of the Scheme, either through physical change or through change to its setting that affected its heritage value, it was included in the impact assessment.</p> <p>If, however, a building or feature had experienced a level of change that would affect its heritage value to a level which meant that significant effects from the Scheme were unlikely, then it was scoped out at that stage of assessment. This sifting process is standard for desk-based assessment and has been applied consistently for the Scheme.</p>
	<p>Examples of this point include:</p> <p>Spaldington Grange is not recorded in the HER and consequently is not considered by the applicant as an NDHA. Yet this building appears to be a well-preserved example of a high status historic farmstead probably dating to the late eighteenth century. It appears little changed from its depiction on the 1855 Ordnance Survey map. It will be surrounded on two sides by the visually</p>	<p>Spaldington Grange is not included in the cultural heritage assessment as it does not meet the criteria for a non-designated heritage asset.</p> <p>At the early stage of the DBA process, comparison of the first edition Ordnance Survey map (dated 1855) with modern aerial imagery noted that the building group had been altered substantially.</p>

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intrusive solar farm (2f and 2g). In my professional opinion, it is likely that its setting (which closely approximates its historic setting) will be damaged considerably and this will cause severe harm to its significance.

Though landscaping (screen planting) may slightly mitigate this impact, it cannot wholly overcome the visual impact as – when seen from the nearby roads and public rights of way - the grange will be experienced from a semi-industrial context. It is also not possible to mitigate the harm to the historic connection between the grange and its surrounding farmland (quite separate from visual considerations), which helps illustrate its history and provides evidence of its development. None of these factors are even recognised, let alone assessed, in the applicant's documentation.

The nearby Sandwood House is also of likely eighteenth century date (it is certainly shown on the 1855 Ordnance Survey map) and appears to also be an historic farmstead.

It is not included in the Humber HER. But again this has not been identified as a NDHA and the impact of the proposed solar farm – it will be sandwiched north and south between two blocks of solar panels (2e and 2f) – on its significance will be even more severe.

Chapel Farm at Welham Bridge is not listed in the Humber HER. Yet it is a mid-nineteenth century chapel, later converted to a school in 1876, and with an interesting history related to the regionally significant Vavasour family who had links to many of the townships affected by the proposals. It may be built on the site of a medieval chapel (Bubwith Village Trust 1979 Bubwith: An East Yorkshire Parish). It is a visually handsome building with a striking appearance, and appears to have been converted into a farmhouse at some point in its history. Its setting will be affected by the proposals. Blocks 1e and 1f may form a visually intrusive element in its setting, especially seen from the A614 as it crosses the bridge over the River Foulness. The distance involved is greater than some other examples, which may diminish impact but, crucially, this has not been assessed at all by the applicant.

Incidentally I can find no evidence that the applicant consulted the excellent book mentioned above, a definitive history of many of the settlements around Bubwith that will be affected by the proposals. It was written by a group of

The first edition Ordnance Survey map shows the principal residence facing to the south with an orchard garden on its eastern side. The current building arrangement derives from alteration of buildings on the northern, eastern and southern sides of the building range, and has the principal residence facing towards the east. This level of change affects the heritage value of the building to a level which meant that significant effects from the Scheme were unlikely, and precluded its inclusion in the cultural heritage assessment.

Sandwood House is characteristic of an early to mid-19th century rural house. A house is illustrated on the tithe and first edition Ordnance Survey maps for the area, and comparison with modern aerial imagery at the early stage of the DBA process noted levels of change to two offshot structures on its east and west gable ends, but no noticeable change to the principal building.

The principal building, which faces south, looks out onto a small orchard garden which provides its aesthetic and domestic setting and contributes to the house's historical interest and heritage value. Another garden and pond occupy the field to the east of the house, and also contribute to its aesthetic and domestic setting.

Large, modern, agricultural buildings are immediately behind the house, to the north, occupying an area that has housed agricultural buildings since at least the publication of the first edition Ordnance Survey map in 1855. The industrial buildings are modern and do not contribute to the heritage interest of Sandwood House.

The assessment carried out at the early stage of the DBA process concluded there would be no change to Sandwood House as a result of the Scheme, including no change to its domestic and aesthetic setting and, as such, no potential for impact or significant effects to its heritage value. Sandwood House was therefore scoped out from the assessment.

The building called Chapel Farm at Welham Bridge does not appear on the tithe map of Spaldington dated 1851, or on the first edition Ordnance Survey map dated 1855. As such, it does not meet the criteria for a non-designated heritage asset and is not included in the cultural heritage assessment. The building is not located within the village of Bubwith, or the parish of Bubwith, and there is no historical or archaeological evidence that this location was the site of a medieval chapel.

The publication Bubwith Village Trust 1979 Bubwith: An East Yorkshire Parish was viewed at the East Riding of Yorkshire archives. However, information from the book was not reproduced in the DBA [APP-080] as descriptions of the parish's townships were gathered during the site walkover and setting assessment of areas and villages relevant to the assessment, and the area's history was gathered from HER records and other data sources listed in Annex A of the DBA.

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	<p>historians in 1979 and was reprinted in 2022 and is widely available. It is perhaps indicative of the quality of research carried out by the applicant that it does not appear in their bibliography at all.</p>	
REP1-119 David Pinnock Humble	<p>2. Inadequate assessment of the setting of identified non-designated heritage assets (NDHAs) and the effect of the proposals on their significance</p> <p>The NPPF defines setting thus:</p> <p>'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'</p> <p>NDHAs have a setting, as confirmed in the PPG 'All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not' (Historic Environment PPG paragraph 013). Historic England's advice note on setting states that: 'Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated (see below Designed settings). Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.' (Historic England 2017 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (2nd Edition), para.9).</p> <p>The applicant's documentation appears to treat NDHAs as if they do not have a setting (contrary to the NPPF, the PPG and Historic England's advice note). It consequently does not acknowledge that there is even the possibility of harm to the significance of those NDHAs it recognises (largely confined to those that appear in the Humber HER) by the proposed development in their settings.</p>	<p>The Applicant considers that the cultural heritage assessment of impact through changes to setting represents an appropriate level of assessment that is relevant and proportionate to the level of likely impact.</p> <p>Heritage assets, designated and non-designated, are included in Chapter 7: Cultural Heritage, ES Volume 1 [REP2-006] where it is assessed there is potential for impacts resulting in significant effects to occur as a result of the Scheme. This includes impacts as a result of changes to setting.</p> <p>With regards to the examples cited, the agricultural fields, whilst providing a visual aspect that is sympathetic to assets associated with the area's agricultural history, are not contemporary with these assets, and are not an important component of their setting that contributes to their appreciation and heritage value.</p> <p>A detailed response to the examples cited in REP1-119 are provided below.</p>
	<p>Examples of this inadequate assessment include:</p> <p>Willitoft Hall is discussed in para 7.5.38 (Environmental Statement: Volume 1, Chapter 7: Cultural Heritage) where it is described as 'Willitoft Hall (MHU2911) which comprises a moated manorial complex with a chapel (MHU 2908). Historical evidence suggests a medieval settlement, which is recorded in the Domesday survey in 1086 as Wilegetot (MHU10076), surrounds the manorial centre.'</p> <p>However, the discussion relates solely to impact on any archaeological remains associated with the hall. It does not discuss its setting or even acknowledge that it has one. Willitoft Hall and its associated heritage assets are likely to derive a great deal of significance from its setting within agricultural fields, which are analogous to its setting from medieval times onward. Block 1a will be highly visible from the surrounding roads and public rights of way and approaches very close to the extant buildings and other NDHAs.</p>	<p>The heritage value of Willitoft Hall derives from its historical interest as a remnant of the medieval landscape and also its archaeological interest, that is, the evidence that can derive from its buried remains. This asset is outside of the Order limits and will experience no physical change as a result of the Scheme. As such, for an impact to occur, the Scheme would have to introduce change to a component of its setting that affects its heritage value.</p> <p>Section 7.5.39 of the ES [REP2-006], confirms there are no archaeological remains associated with the medieval settlement at Willitoft within the Solar PV Site. This evidence derives from the results of geophysical survey and trial trench evaluation, which are submitted as [APP-081] and [REP1-018]. As such, it is recognised that there are no contemporary associative relationships within the Solar PV Site that form part of the setting of Willitoft Hall and make an important contribution to its heritage value. The Site does not contribute to the asset's setting.</p> <p>In terms of Willitoft Hall's broader setting and the relationship with the wider landscape, including the fields within the Order limits, the Historic Landscape assessment in section 4.4 of the DBA [APP-080] confirms that mid to late-20th century enclosure has resulted in significant change to the landscape and, apart</p>

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		<p>from possibly the trackway leading to and from Willitoft, which is outside of the Order limits, there are no associative relationships within the landscape that would make a significant contribution to the setting and heritage value of the moated site. The fields within the Order limits provide a sympathetic backdrop, but they do not contribute to the asset's setting.</p> <p>The Scheme would result in no change to the setting of Willitoft Hall and its associated heritage assets and would not affect their heritage value. This constitutes no impact and no effect.</p>
	<p>There are two moated sites in Spaldington as well as the associated remains of the site of a mediaeval chapel). These are clustered around the extant Hall Farm, which is a farmstead built c.1838 on the site of the Elizabethan Spaldington Old Hall (Bubwith Village Trust 1979 Bubwith: An East Yorkshire Parish). Altogether there is a cluster of several entries in the recorded in the Humber HER. The present buildings appear well-preserved when compared to their depiction on the 1855 Ordnance Survey map (including a range of historic farm buildings, which appears to include a rare survival of a horse-gin).</p> <p>All these NDHAs are on the site of Spaldington Old Hall. However no consideration is given to the impact on their setting of block 2e, which comes right up to the immediate curtilage of the heritage assets. All of the assets, including the moated site that lies immediately adjacent to block 2e, derive significance from their setting in rural fields which approximate the setting of what is clearly an historically important site that dates to at least the post medieval period. It is astonishing that no assessment of this has been made.</p>	<p>The heritage value of this asset group, all of which are located outside of the Order limits, derives from their historic and archaeological interests. The evidence from archaeological geophysical and trial trenching fieldwork surveys [APP-081] and [REP1-018] confirms that buried archaeological remains associated with the asset group are not present within the Solar PV Site.</p> <p>Section 4.8.22 of the Cultural Heritage DBA [APP-080] suggests that components of the medieval landscape, such as some of the current field boundaries, may be partially identifiable in the current modern field pattern, assuming that the current Willitoft Lane is contemporary with medieval settlement. As such, it cannot be asserted that the Solar PV Site makes a significant contribution to the setting of the asset group as there is no archaeological evidence of tangible associative relationships within the Order limits. Even if it was proven archaeologically that some of the field boundaries were contemporary with the medieval and later medieval assets in Spaldington, the boundaries are not being impacted by the Scheme, which would constitute no change.</p> <p>The Scheme would not change the setting of the assets and would not affect their heritage value. This constitutes no impact and no effect.</p>
<p>REP1-119</p> <p>David Pinnock Humble</p>	<p>3. Inadequate assessment of the setting of listed buildings and the impact of the proposals on their significance</p> <p>Paragraph 7.7.52 (Environmental Statement: Volume 1, Chapter 7: Cultural Heritage) assesses the impact on Rowland Hall, a grade II listed building. The house is the remains of a late eighteenth century farmstead, clearly shown with its former farm buildings on the 1854 Ordnance Survey map. The applicant acknowledges that it is a 'farmhouse' (Para. 7.7.41). It will be surrounded to the north and east by solar panels. While those to the north (3b) will be separated from the house by the existing railway line, those to the east (3c) will not and approach very close to the listed building.</p> <p>This historic farmhouse has an historic, functional relationship with the surrounding fields, which contribute to its significance and are crucial to allowing its significance to be appreciated. The surrounding fields form part of its setting that make an important contribution to its significance.</p> <p>Astonishingly, the applicant claims that 'The surrounding fields do not make a significant contribution to the houses' heritage value'. For reasons that are unclear, the proposed solar panels in 3c are not considered (only those in 3b) despite the fact that those in 3c will approach right up to the grounds of the</p>	<p>The setting of Rowland Hall Grade II listed building (1083172) and the contribution that it makes to the asset's heritage value is assessed in Section 4.3.15 of the Cultural Heritage DBA [APP-080]. This considers the surrounding farmed landscape and states that '<i>the farmland beyond the garden provides a sympathetic setting to the house, one that is indicative of the building's historical links to the agrarian economy but is not a principal component of the setting that contributes to its value.</i>' This acknowledges that the farmland does make a contribution to the asset's value, particularly that to the south-west of the house where it is viewed within a farmland setting and which features in views south-westwards from the asset's principal elevation over its associated garden. The Scheme will not change this aspect of the asset's setting.</p> <p>The solar panels in fields 3b and 3c are also discussed in Section 4.3.15 of the DBA [APP-080] which states that '<i>any views of the Solar PV Area 3b to the north, gained from the upper floor windows of the farmhouse, would be largely obscured and highly limited in nature. As Solar PV Area 3c lies to the south-east of the farmhouse, it is likely that only very partial views of the Scheme would be possible from the upper floor of the farmhouse, given intervening hedgerows and the facing direction of the farmhouse itself angles away from this direction.</i>'</p>

Examination Name Library Ref	Comment	Applicant's Response at Deadline 3
	<p>house and will represent a very severe visual intrusion. These will cause harm to the house's significance. The poor quality analysis in this example calls into question the other assessments that the applicant has undertaken on the other designated heritage assets</p>	<p>The assessed impact to the asset, through potential change to its setting, is provided in Section 7.7.58 of Chapter 7: Cultural Heritage, of the ES [REP2-006] this concludes that <i>'partial views of the Scheme would represent change in views from the house but would not change that part of its setting that contributes to its historic or architectural interest or its heritage value. The presence of the operational Scheme would therefore constitute no impact resulting in no effect.'</i> This assessment is based on the Scheme layout which avoids introducing solar panels into the farmland to the south-west of the house.</p> <p>The impact of the temporary construction activities associated with the Grid Connection Corridor to the north of the house are assessed in Section 7.7.41 of the ES [REP2-006] to constitute a very low impact to the asset, resulting in a negligible effect which is not significant.</p> <p>In section 7.215 of the Local Impact Report from ERYC [REP2-022], the Local Planning Authority Conservation Officer agrees that the effect from the Scheme on the heritage significance of Rowland Hall Grade II listed building would be very low to negligible, and that potential impacts have been accurately represented in Chapter 7 of the Environmental Statement [REP2-006].</p>
<p>REP1-103 Brian Birkett</p>	<p>As chairman of a local heritage society I was alarmed to see the haste in which archaeological survey work was carried out. The over reliance of geophysical surveys such as magnetometry is well known, in this case the magnetometry survey appeared by observation to be carried out at 1m intervals between probes, where as 0.5m would be far better. Even at higher resolution archaeological features are often missed by relying on these techniques.</p> <p>I know of at least one Romano-British settlement close to Gribthorpe, that we have factual hard evidence for, that did not show on the magnetometry results. Given this how many other archaeological sites were missed by this survey? Again, the scale of the project makes survey work of any kind almost impossible to carry out with sufficient diligence.</p>	<p>The evaluation carried out for the Scheme has comprised both geophysical survey and trial trenching. The design and scope of both the geophysical survey and trial trenching were agreed with the Archaeology Officers for the Local Planning Authorities and carried out in accordance with current guidance and best practice.</p> <p>For the geophysical survey specifically, this included standard and guidance for archaeological geophysical survey published by the Chartered Institute for Archaeologists, Historic England, and the European Archaeological Council. Section 5: Methodology of the Geophysical Survey Report [APP-081] details that the equipment used by the archaeological geophysical survey contractor comprised Bartington Instruments Grad 13 Digital Three-Axis Gradiometers positioned in real time using an RTK GNSS. These sensors & GNSS have a more rapid sampling rate than older generation magnetometers, whilst also maintaining positional accuracy and data quality. The sensor separation of 1m is standard practice and conforms to the European Archaeological Council's standards for Prospection & Delineation level surveys.</p> <p>The trial trench evaluation tested areas where possible archaeology had been identified by the geophysical survey and, crucially, also tested areas that the geophysical survey suggested were archaeologically 'blank' or empty. The geophysical survey results [APP-081] and the subsequent trial trench evaluation report [REP1-018] confirmed the presence of Romano-British settlement and industrial archaeology within the Order limits, including Site 1 to the west of Gribthorpe, and Site 2 and Site 3 to the south and south-east of Gribthorpe, respectively. These sites, and other areas identified for archaeological mitigation, are detailed in the Overarching Written Scheme of Investigation [REP1-086] for Archaeological Mitigation, which has been agreed with the Archaeology Officers for the Local Planning Authorities and Historic England.</p>