

23 September 2024

SLR Project No.: 407.064740.00001

**RE: P241510/F – Land at Stoke Edith Hereford Herefordshire
Response to Built Heritage Conservation Officer (Herefordshire County
Council) Comments**

1.0 Introduction

- 1.1.1 In May 2024, SLR Consulting Ltd prepared a Historic Environment Desk Based Assessment (HEDBA) for the proposed solar farm development at a parcel of land at Stoke Edith, Herefordshire, HR1 4HG (NGR: SO 59550 41664) (**Plate 1**) (planning ref. P241510/F). SLR Consulting Ltd were then commissioned to provide a rebuttal, responding to comments from the Local Planning Authority's Built Heritage Conservation Officer within their consultation response (dated 27th June 2024).
- 1.1.2 The following statement has been prepared to reply to specific conclusions reached by the Built Heritage Conservation Officer at Herefordshire County Council within their formal response with regards to the potential impact of the proposed development and in their refusal of planning permission, referencing the setting of a Grade I listed Church. It is notable here that Historic England whose remit includes Grade I listed buildings did not raise an objection.



Plate 1: The Site (in red) in relation to Stoke Edith RPG (in green) and the Church of St Mary (in blue)

2.0 Response

- 2.1.1 This document will seek to respond to key elements of the Built Heritage Conservation Officer comments dated 27th June 2024, with a view to rebutting their objection.
- 2.1.2 This rebuttal has been undertaken by Alice Sargent, Associate Archaeologist (BA (Hons) ACIfA), with technical oversight provided by Dr Emma Wells (MCIfA, FSA, SFHEA), Technical Director and Head of Built Heritage. Emma is a trustee of the Churches Conservation Trust and sits on the Church Buildings Council Stained Glass committee.

3.0 Rebuttal

- 3.1.1 The HEDBA assessed the potential harm through setting change to a number of designated heritage assets within the vicinity of the proposals. It was concluded that only one designated heritage asset would experience less than substantial harm through setting change; the Grade II RPG Stoke Edith (1000897). The Officer agrees with the level of harm identified to the RPG but asserts that less than substantial harm would also be experienced by an associated Church; the Church of St Mary (1099825).

- 3.1.2 Key statements set out within the Officer's response are as follows:

It is noted that the Historic Environment Desk Based Assessment details the views from the Churchyard to the site and vice versa. Views from the site are in many ways a lesser consideration than the views across the application site towards the Church which have not been addressed in the Historic Environment Desk Based Assessment. In addition the views from the Churchyard referenced the existing landscaping, whilst this is acknowledged, it is also noted that the landscaping is outside the applicants control (Paragraph 13).

...it is considered that the relationship between the 2 [the RPG and the church] is such that a less than substantial harm on the setting of the RPG would apply equally to the grade I listed Church at the centre of the parkland albeit not within the designated area. (Paragraph 18).

It is considered that the Church spire being so closely linked with the Registered Historic Park and Garden would have an associative view (Paragraph 17).

- 3.1.3 It is a necessary aspect of assessing setting that contribution to significance of a heritage asset be articulated, or how it allows that significance to be appreciated. Any aspect of a heritage asset's setting which cannot be explained with reference to significance must therefore be considered a matter of amenity; this was explained within the HEDBA, and is reinforced by Historic England's *The Setting of Heritage Assets* 2017:

being tall structures, Church towers and spires are often widely visible across land- and townscapes but, where development does not impact on the significance of heritage assets visible in a wider setting or where not allowing significance to be appreciated, they are unlikely to be affected by small-scale development, unless that development competes with them, as tower blocks and wind turbines may. Even then, such an impact is more likely to be on the landscape values of the tower or spire rather than the heritage values, unless the development impacts on its significance, for instance by impacting on a designed or associative view'.¹

- 3.1.4 Whilst it is acknowledged that the tower and spire of the Church do act as somewhat of a visual landmark or feature over a wider area, most of which has a rural character, this will not be impacted by the proposed development. Views from within the Site towards the Church are limited to the spire

¹ Historic England., 2017. *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*.

only (**Appendix 1, Photos 1-4**). In all cases, they are also merely glimpsed views. The views from the Site are not designed nor key views which best showcase or illustrate any aspects of the Church's significance, namely its historic and architectural interest (*HEGPAN para 30: page 2*), nor can the asset be fully appreciated or understood from the Site. Such aspects are only fully understood from the Church's associated grounds and interior, with its role as a former serving estate Church to the Stoke Estate best appreciated from within its immediate vicinity. This is due to intervening vegetation and existing built form including farm buildings and estate buildings as part of Stoke Edith, which generally screens views of the Church from across the majority of the RPG, allowing glimpsed views of the spire only (e.g. **Appendix A, photos 6-8**). In such internal views, the Site, lying at a distance north of the Church and RPG, does not contribute to any elements of setting nor any understanding of the historic association between the RPG and the Church.

- 3.1.5 As such, the Site does not materially contribute to the significance of the church. The greatest part of the building's significance is vested in its built form, which has architectural, artistic and historic illustrative value as well as a well-preserved survival of a 14th century tower. The development will not close off views, with views from the RPG towards the north largely unchanged. As the proposed scheme preserves the way in which it enables the significance of the Church to be appreciated, it stands to reason that any change stemming from the proposed scheme would cause no harm.
- 3.1.6 The proposals comprise the retention and reinforcement of the existing hedgerows and hedgerow trees with additional planting to fill gaps in existing hedgerows along the western and southern Site boundaries. These boundaries are within the control of the Applicant. By year 15, the establishment of proposed landscape strategy planting will lead to a softening and filtering of the development. The proposed tree belt along the southern and western Site boundaries once established, will further screen views in and out of the Site. This in turn will reinforce the existing green infrastructural network in the Site and immediate context.
- 3.1.7 Whilst it is acknowledged that there is group value between the Church and the RPG, this does not automatically imply that all views incorporating both assets are important. Any views from the Site looking south towards the Estate whilst incorporating the spire and the Estate plantations, are a by-product of the spire's prominence and such views are not designed or important in appreciating the significance of either asset. The Church has historically been set within enclosed grounds with woodland to its north therefore restricting views out to the surrounding RPG and surrounding landscape. It is not considered that consequential effects on the setting of the RPG would extend to the Church in this instance.
- 3.1.8 Furthermore, change is not innately harmful – it is only harmful where significance is harmed, or the ability to appreciate that significance is otherwise diminished. As clarified in the High Court, preservation does not mean that change is not possible; it specifically means no harm. This is echoed in *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2 (GPA 2)*, which states that '*Change to heritage assets is inevitable but it is only harmful when significance is damaged*'. A change in landscape character within the setting of the Church is not innately harmful; harm would only arise where significance is lost, or the ability to appreciate that significance is reduced. A change will occur, but where there will no impact to important views, no harm will arise.

3.2 Polytunnels

I note the location of the solar farm, which is in a landscape of agricultural use including polytunnels, and would request consideration of the cumulative impact on the setting of heritage assets.
(paragraph 20)

- 3.2.1 In reference to the Officer's comment above, the HEDBA takes into the account the baseline as present at time of writing. This includes for all interventions within the landscape.
- 3.2.2 In this instance, the cumulative impact of polytunnels on the significance of Stoke Edith RPG is not required as part of an assessment of impact on heritage assets. Regarding polytunnels specifically, although lacking any architectural or historic interest, these are temporary structures and generally



redundant in terms of their impact on the interpretation of an asset's significance and on the area's character. The uses of polytunnels are compatible with countryside locations and are typical of such an agricultural landscape.

- 3.2.3 We would suggest that this, if anything, is an amenity issue, rather than heritage and should be dealt with as appropriate, i.e. via the landscape consultant.

4.0 Conclusion

- 4.1.1 This document has considered the concerns raised by Herefordshire County Council's Built Heritage Conservation Officer in their consultation on the proposed development ref P241510/F. It has considered the Officer's comments in line with the available evidence, notably the Church of St Mary, and the submitted Historic Environment Desk-Based Assessment. Following the processes set out within relevant legislation and guidance and as referenced within this statement, the submitted HEDBA identified no harm to the Church of St Mary. The proposed development would not harm the significance of the Church through a change to its setting. The ability to understand, appreciate and experience the asset would not be affected by the proposed development.
- 4.1.2 There is only the identified impact to Stoke Edith RPG that was identified within the HEDBA, which equates to Less than Substantial Harm to a Grade II Registered Park and Garden. This harm should be weighed against the public benefits of the proposal in accordance with paragraph 208 of the NPPF (2023). There are significant public benefits of renewable energy development as set out within the Planning Statement (Stantec 2024), which clearly outweigh the low level of harm.



Appendix A - Site Inspection Photos





Photo 1: View of St Mary's spire (marked by blue arrow), from the eastern boundary of the Site, partially screened by the Site's perimeter vegetation

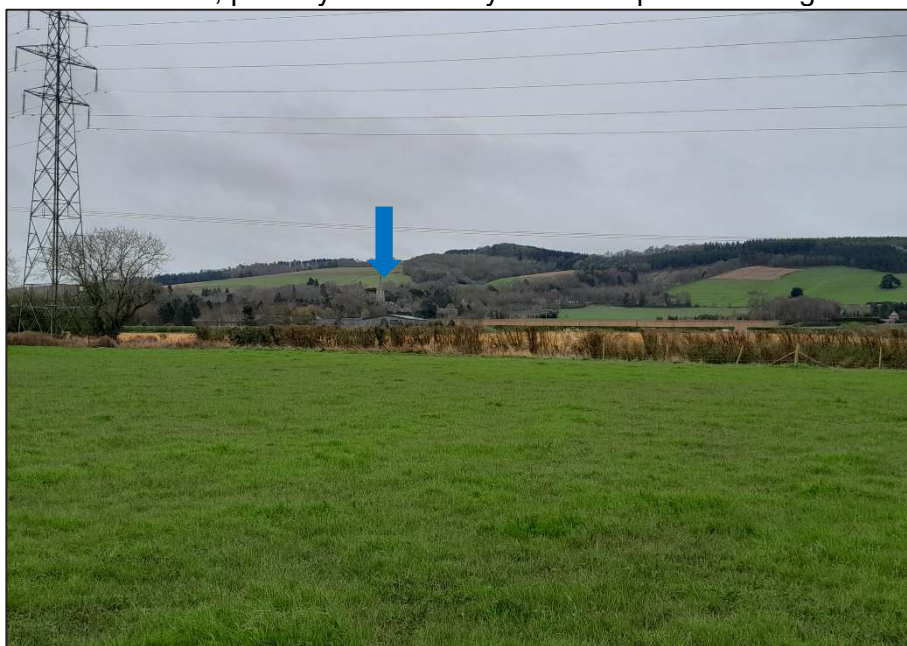


Photo 2: View of St Mary's spire (marked by blue arrow), from the south-east field of the Site, partially screened by the Site's perimeter vegetation and farm buildings sited between the Site and the Church.



Photo 3: St Mary's spire screened by the Site's perimeter vegetation.



Photo 4: View of St Mary's spire (marked by blue arrow), from the north-west field of the Site, partially screened by the Site's perimeter vegetation and Stoke Edith House.

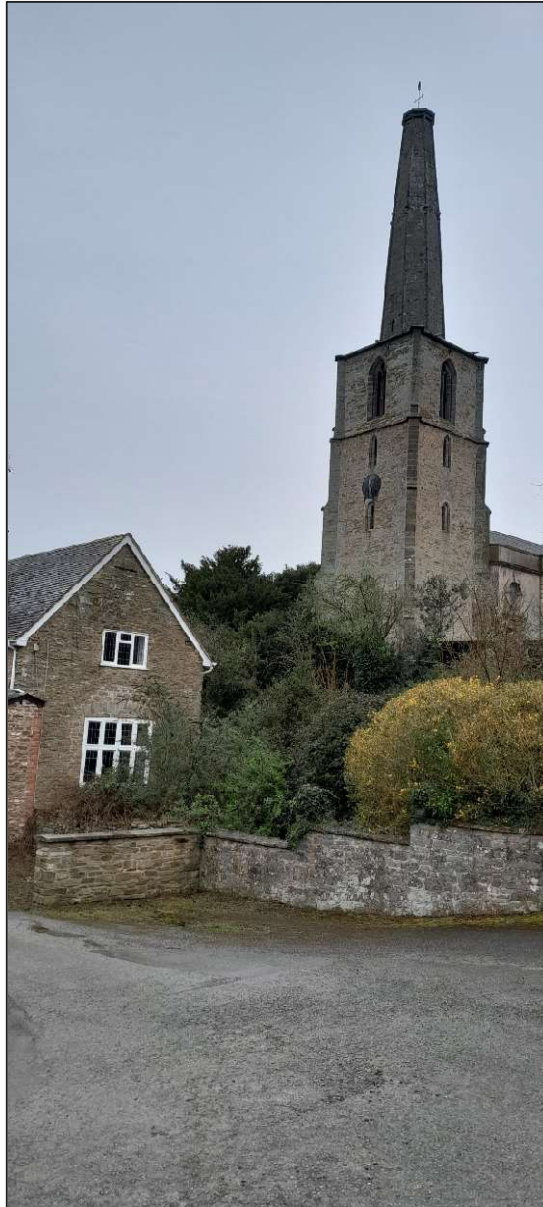


Photo 5: View of St Mary's spire from The Hamlet.



Photo 6: View of St Mary's spire behind extensive vegetation, taken to the south of the Church.



Photo 7: View of St Mary's Church, taken to the south of the Church.



Photo 8: View of St Mary's Church, taken from the north from The Hamlet, the body of the Church screened from view by vegetation and Stoke Edith House.