

Heritage Further Addendum

Land at Bosted Solar Farm.

On behalf of RES Ltd.

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Document Management.

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Contents.

Document Management.....i

1. Introduction.....3

2. Updates to the Proposed Development 4

3. Consultee Comments 5

4. Archaeology 9

5. Updated Assessments 11

6. NPPF 2026 Updates 19

1. Introduction

- 1.1. This Further Heritage Addendum (FHA) has been prepared by Pegasus Group on behalf of RES Ltd to support an application for planning permission for a solar farm at Land west of Boxted, Suffolk (reference: DC/23/O5127).
- 1.2. This FHA has been produced to provide an updated appraisal of the effects to heritage assets arising from the development following amendments to the proposed development layout and landscaping proposals. These amendments have been made to address heritage comments from consultees.
- 1.3. Since the previous Heritage Addendum by Pegasus Group, authored in February 2025, further consultations comments have been received addressing this Addendum. Where any new points are made, or any matter which requires clarification or rebuttal are made in these new comments, these are addressed in this FHA.
- 1.4. This FHA also provides an update regarding the newly issued 2026 National Planning Policy Framework where relevant.
- 1.5. This FHA follows the methodology and guidance set out in the original Heritage Assessment.

2. Updates to the Proposed Development

- 2.1. The layout of the proposed development has been adjusted as follows:
- Removal of three areas of panels in Fields 3, 5 and 2 for archaeological purposes;
 - Reduction in height of panels from 3.5m to 3m;
 - Removal of area of panels from western side of Field 1 – for heritage and landscape purposes to reduce the amount of Scheme visible in longer distance views;
 - A new area of proposed woodland planting to link Park Wood and Lownage Wood to address consultation responses relating to ecology and landscape; and
 - Creation of a new picnic area and permissive circular route.
- 2.2. These changes are shown on the Landscape Masterplan figure submitted as part of these Addendum submissions.

3. Consultee Comments

- 3.1. As set out above, following the issue of the February 2025 Heritage Addendum, consultees have responded with a further round of comments. This further Heritage Addendum provides an opportunity to respond to these comments and where they make new points, or make points which may require clarification or further rebuttal, these are set out below.

Historic England 14th March 2025

- 3.2. The updated consultation response from Historic England represents a material change from their previous response in terms of harm they consider arising to designated heritage assets as a consequence of the Scheme. Their previous consultation response in the Recommendations section held concerns about the grade II* Boxted Hall (the response describes this as Grade I but this is a GII* asset) and the grade I All Saints Church. However, in the March 2025 response, this has been reduced to Historic England having concerns relating only to All Saints Church.
- 3.3. Historic England maintain a position of no objection to the Scheme and note in their response *'We are keenly aware of the emphases placed on developing sources of renewable energy in planning policy and would advise the Council that they should weigh this harm against the public benefit of the development, as required by the NPPF'*. This support for renewable energy development by Historic England is reflected in their recently issued updated guidance *Delivering Clean Power: Commercial Renewable Energy Development and the Historic Environment* (HEAN15 2nd ed) 2026. Under the heading of Climate Change at paragraphs 7 – 9, they state:

"7. One of the main drivers to increase renewable energy development is the need to reduce carbon emissions and support climate resilience. Increasing the pace of decarbonisation is crucial for the UK to meet international and national agreements.

8. The Government's Clean Power 2030 Action Plan (DESNZ, 2025b) seeks to accelerate the UK's trend of transitioning energy generation away from fossil fuels towards renewables and other low-carbon infrastructure. Renewables' share of total UK power generation in 2025 reached a record high level of 52.5% (DESNZ, 2026).

***9. The Government aims to make the UK a clean energy superpower. Historic England supports the transition towards clean power as a way of both tackling climate change and driving sustainable development across England. This Advice Note provides advice on how decarbonisation of energy can be achieved in ways that take the historic environment, on land and at sea, into full consideration."* (my emphasis)**

- 3.4. In consideration of the grade II* listed Boxted Hall, the Historic England response changes from their previous position and they now consider that: *'From the evidence submitted we would concede that there is unlikely to be harm directly to Boxted Hall from the development and even at the edge of its historic parkland views of the development are likely to be minimal'*.
- 3.5. They go on to state: *'The parkland setting of the Hall is not in itself a designated heritage asset but it does appear there might be views towards it from beyond the park edge which might include the proposed solar panels. We would recommend this is considered by the*

Council as part of the wider landscape. As Historic England set out, the parkland is not a designated asset and views of an asset alongside development is not necessarily harmful. Furthermore, matters relating to landscape are not heritage issues. It should be remembered that if there is a view of edge of parkland and panels, this is not a view of Boxted Hall. Nor is it a view of the interior of parkland, or any potential surviving elements of parkland associated with Boxted Hall.

- 3.6. With regards to All Saints Church, Historic England continue to maintain that the Scheme would cause some harm but they accept in this response that this would be *less than substantial* (in the wording of the previous NPPF).

- 3.7. Their conclusion states:

"In summary, while we would conclude that the proposed development is unlikely to result in harm to the significance of Boxted Hall and recommend the impact on the area beyond its historic park is considered by the Council as part of the wider landscape, we remain of the view that there could be less than substantial harm to the significance of the parish church of All Saints."

- 3.8. To address one other point made in the Historic England response, they characterise the solar scheme as being *'industrial structures alien to the landscape'*. The Historic England Commercial Renewables guidance HEAN15 2nd Ed 2026 does not characterise, describe or use the words *industrial* or *alien* to describe solar installations at all nor does it use these words in terms of assessing impacts or change to the significance of assets through change to setting. Furthermore, it is widely accepted that solar schemes do not represent development which is out of place in a modern agricultural landscape. The Scheme allows for the retention of existing field patterns and proposes to reinstate new field boundaries where possible. This is a position supported by Government in their *Solar Roadmap document Annex 2: Solar Case Studies and misconceptions* which has a section addressing the misconception that Solar is industrialising in the countryside. In response to this, the Annex states:

"Solar farms are carefully designed to have a minimal visual impact. They can usually be easily screened by hedges and other vegetation, and visual impact is carefully considered during the planning process. They operate almost silently, without pollution, and once operational generate very little maintenance traffic."

- 3.9. It can, therefore, be said that solar schemes do not represent *alien* or *industrial* features in the countryside.

Babergh and Mid-Suffolk Principal Heritage Officer 22nd July 2025

- 3.10. This response maintains the same conclusions as their previous response of 13th December 2023 but does clarify the levels of harm to assets discussed in the previous comments but not specifically set out. For those assets the Officer confirmed:

- The Hare and Hounds, Somerton – no harm;
- Somerton Hall – less than substantial at a very low level (in language of previous NPPF); and
- Hartest Conservation Area – no harm.

- 3.11. The Officer comments make reference to the possibility of Moorhouse Farm being a park lodge for Boxted Hall. This was addressed in the previous Heritage Addendum but further to those comments, it is noted that the presence of a solar scheme would not undermine that knowledge, given it is knowledge that can only be gained through documentary research. It is not plainly evident from simply looking at the building, with the land of the Site being of no help in this understanding either.
- 3.12. The LPA Heritage Officer makes reference to the parkland of Boxted Hall possibly being a non-designated heritage asset. This is discussed in more detail below.
- 3.13. It is noted that the level of harm alleged by the LPA Heritage Officer, whilst to a larger number of assets than Pegasus assess, continues to be at a low level for all of the assets with the exception of Moorhouse Farm where they allege a medium level of harm. As such, these harms need to be subject to the test of policy **HE6.4** of the 2026 NPPF with the harms weighed against the public benefits. It is noted that the 2026 NPPF is clear to note at policy **W3** that **substantial weight** should be given to considerations of proposals for renewable energy development.

Suffolk Preservation Society 5th March 2025

- 3.14. The response from the Preservation Society restates their previous conclusions – but do acknowledge that the Scheme would not ‘surround’ Moorhouse Farm.
- 3.15. They do reiterate their concerns over the longer distance views over the valley. The discussion of Moorhouse Farm in relation to the amended Scheme and VPs 7 and 10 should help to allay these concerns by reducing the amount of the Scheme visible in such views.

Save Glem Valley 6th March 2025

- 3.16. The Save Glem Valley group (SGV) submitted further comments on heritage and archaeology and their position does not change from their previous conclusions. Specific points made by the group, where needed, are addressed in the text below.
- 3.17. A few notes of clarification need to be made in respect to the SGV response. At paragraph 1.4 they state that the previous Heritage Addendum stated that the exterior of Moorhouse Farm was *not important*. This is not accurate – nowhere in the Addendum is this stated. It does state, correctly, that the majority of the significance of this asset is derived from its built fabric and specifically the preserved historic 15th and 16th century interior elements. That is not saying that other elements are not contributors to significance but that the key elements of the significance of this asset are the internal surviving features and fabric of the 15th and 16th century. This aspect of the buildings’ significance will not experience any change at all from the Scheme.
- 3.18. The SGV response at paragraph 1.7 states that Dripping Pan Wood is a medieval woodland. This woodland is not identified as Ancient Woodland and therefore cannot be said to be of the same age as Lownage and Park Wood which are both acknowledged as Ancient Woodland.
- 3.19. Further, SGV allege at section 4 that Historic England allege harm to the grade II* Boxted Hall. It is acknowledged the SGV response was prepared before the later submission of the Historic England response but to be clear, within the Historic England response, they no



longer allege harm to this asset from the Scheme. It is also the case that they have never alleged harm to the GII listed walls and gardens.

3.20. The submissions relating to Moorhouse Farm are discussed in more detail below.

4. Archaeology

- 4.1. Following the previous Heritage Addendum, discussions have been held with the Suffolk LPA archaeologists to establish the scope of further works that may be required. The conversation also helped to establish the key areas of archaeological sensitivity within the Scheme design and involved the discussion of the then yet to be finalised *Archaeology and Solar Farms Good Practice Guide* prepared by a cross-party body of heritage professionals comprising Historic England, ALGAO, ClfA, FAME and Solar Energy UK. This sets out the importance of a proportionate approach to archaeology when considering solar farm development.
- 4.2. This guidance document has now been published and has been endorsed and referenced in the newly updated guidance from Historic England on *Delivering Clean Power: Commercial Renewable Energy Development and the Historic Environment* (HEAN15 2nd ed) 2026. This document references the *Archaeology and Solar Farms* guidance and signposts this as the source of information when looking at mitigation or archaeological requirements and good practice for solar farm developments.
- 4.3. The updated layout has removed three areas of panels which correspond to areas of archaeological sensitivity as identified within the geophysical survey. This has been undertaken to secure the preservation of these areas in-situ. The areas of removed panels are located in Field 3, across the boundary of Field 5 and in the northeastern corner of Field 2.
- 4.4. The area in Field 3 has been removed to preserve a complex of features which comprise irregular-shaped enclosures with internal and external features. The survey identified a ring ditch within the larger enclosure and the area was also noted to be scattered with flints. A smaller enclosure is located to the south also with internal features with a possible associated field system. This area was interpreted as being possibly Iron Age in date.
- 4.5. The second area of archaeological features was identified in Field 5. This area corresponds with an HER entry (MSF17092; BXT021 – sub-rectangular enclosure with possible later addition to the north of Lownage Wood). The complex comprises a large rectilinear enclosure with an entrance in the southern corner leading to a ditch with further enclosures located to the northeast and southeast. The HER records the feature as late Bronze Age or Iron Age. Pit anomalies were found within an enclosure with internal ditches.
- 4.6. The third area is in Field 2 and contains a circular anomaly in the northeastern corner. This corresponds with a HER record of a round barrow (MSF45774; BXT060). The geophysical survey also identified parallel trends leading away from the location of the circular anomaly to the southwest. It is suggested there is the potential for this feature to be a banjo enclosure.
- 4.7. It is the case, that the geophysical survey was successful in identifying areas of archaeological activity within the Site, identify two discrete zones of activity with a ring ditch or possible banjo enclosure in the northeast corner of Field 2. There is no indication of any large-scale or widespread interference or activity which would or could obscure archaeological features. The survey suggests that the potential for significance archaeology beyond these discrete areas of potential is low.

- 4.8. This strategy has been put to the LPA archaeologists via an email of 9th September 2026. The LPA responded on 15th September 2026 and stated that

“In principle, SCCAS would be ok with the proposed preservation in situ by design approach, subject to the submission of an updated layout plan and the approval of an Archaeological Management Plan (AMP).”

- 4.9. The LPA go on to set out a number of elements that they would wish to see within the AMP. An Archaeological Mitigation Plan (AMP) is currently being prepared to submit to support the application which will set out the measures outlined in the email from the LPA including those to be taken to ensure these three areas are protected during the construction period, i.e through fencing off and toolbox talks to ensure contractors are aware of the location of these areas and no accidental tracking of vehicles is undertaken across them. The document will also set out the measures to protect the areas through the operation, monitoring requirements and measures to protect the areas during the decommissioning stages of the projects.
- 4.10. The AMP also will set out the specifications of the above-ground access track crossing the areas of exclusion. This track will be the same as being deployed within the tree root protection areas and is specially designed to avoid compaction of the ground.
- 4.11. It is considered that any further intrusive archaeological works associated with this application can be conditioned and carried out post-consent.
- 4.12. With the preservation in-situ of the areas of archaeological sensitivity, and given the low level of physical impact of the majority of the solar development area, the level of harm to non-designated archaeological deposits is considered to be low to very low. As such, the test of policy **HE7.2** of the 2026 NPPF is applicable which requires:

“Where a development proposal would harm the significance of a non-designated heritage asset, this should be weighed against the benefits of the proposal and a balanced judgement made, having regard to the scale of any harm or loss and the significance of the non-designated heritage asset.”

5. Updated Assessments

Moorhouse Farm

- 5.1. The removal of panels from the western side half of Field 1 has the effect of creating an extremely generous buffer of space between the edge of the panels and the grade II asset. The buffer is over 230m between the asset and the nearest built form of the panels. This is beneficial for a number of reasons. When travelling along the access track to Moorhouse Farm, the panels are separated from view firstly by the dense woodland belt north of Field 2, then they are well-set back from the track in Field 1 with the western half of the field being empty of panels meaning that on the approach to the asset, the panels would be far behind the viewer on the approach.
- 5.2. The previous Heritage Addendum discussed the views south across the valley towards this asset as shown on VP7 and VP10 of the LVA photomontages. The effect of the Scheme on these views across the Glem Valley were highlighted in the LPA Heritage Officer's original consultation response and in the SGV response at paragraph 16 as being a cause for concern and as such, amendments to the layout have been carried out to assuage these concerns. These have resulted in a noticeable reduction in the visibility of the Scheme from the locations to the north of the asset across the Glem Valley.
- 5.3. VP7 is taken from 'Blacksmiths Corner': the junction of a minor road and the B1066 looking south across the Glem Valley. The VP shows the clear and noticeable difference in the view with the amended scheme vs the original layout. The panels are now shifted far to the 'left' of the asset, in line with the row of pylons running north-south through the Site. This has resulted in the panels being demonstrably distanced from the asset.
- 5.4. The submissions of both the LPA Heritage Officer and Save Glem Valley on the views of Moorhouse Farm have been taken into account with the removal of the panels from the western half Field 1. As the updated VP7 demonstrates, the removal of these panels means that Moorhouse Farm remains surrounded by agricultural open fields. The LPA Heritage Officer 2025 response set out the possibility that because Moorhouse Farm may once have been a park lodge for Boxted Hall that the '*building was not placed to be isolated, its location not fortuitous but intended to be seen from afar within its landscape surroundings*'. The removal of panels from the western half of Field 1 ensures that this asset is very much still seen from afar within its landscape surroundings. It is noted that there was likely never any intervisibility between Moorhouse Farm and Boxted Hall, indeed mapping from the early 19th century onwards shows dense orchard planting to the immediate east of Moorhouse Farm, screening views in this direction.
- 5.5. The removal of the panels in Field 1 also helps to maintain '*the harmony and expansive quality of the farmland setting of Moorhouse Farm*' that is described in the LPA Heritage Officers response.
- 5.6. VP10 is taken from the footpath Hartest FP10. The amended layout has again, pulled back the panels such that they are no longer seen in the same "space" as the asset. Whilst they are still visible, they are materially further away, allowing Moorhouse Farm to be visually experienced as an asset located within agricultural surrounds with pockets of woodland and hedgerow planting. This experience, which is what is seen now, will be retained due to the amended layout.

- 5.7. The Scheme does not form a backdrop to the building and the separation between panel and asset that is apparent now in VP7 and VP10 and the concerns of SGV in their March 2025 Heritage response that panels would be '*to the left, above and to the right*' is allayed to a very great extent. No panels are visible behind the asset and are only glimpsed to the 'right' or west of the asset (looking south) with these glimpses removed entirely by Year 7 at the latest due to the landscaping proposals. Whilst panels will still be distantly visible in the views from VP7 and VP10 to the 'left' or east of the asset, the level of separation is significant and the asset appears to still lie within its plot of land with open agricultural land on all sides of the asset.
- 5.8. Side-by-side comparisons of the original and updated layout show a clear and marked difference in the views to this asset from the northern side of Glem Valley and demonstrate a commitment to minimise visual effects to this asset.
- 5.9. The changes made to the layout ultimately do not reduce the level of harm identified by Pegasus Group in their assessment which remains as low harm, not considered to be substantial. This is because the harm is already at a low level and is derived in the main from the temporary change in character of land within the Site which was once historically associated with the asset.
- 5.10. The changes show that the harm to the heritage asset has been minimised and addressed concerns raised by consultees and other interested parties.

Response to SGV Comments

- 5.11. With regards to the submissions of Save Glem Valley with regards to this asset, it is noted that the asset may have been in the possession of the Poley family until 1995 with occasional period of time within a different ownership but three things flow from this. Firstly, it is a matter of fact then that this asset no longer has any association with Boxted Hall; secondly, the understanding of this association is appreciated only through documentary records and thirdly, the asset has no current association with the land of the Site. A solar scheme will have no effect whatsoever on the ability to understand or appreciate that Moorhouse Farm was once in the ownership of the Poley family and now no longer is. There is nothing about the land within the Site that gives any indication of this connection.
- 5.12. It is also important to note here the Scheme will not cause any harm to the physical fabric Moorhouse Farm. The Scheme is located on land to the south of this, which has no current connection with the farm.
- 5.13. The SGV response and the previous SGV comments make the assertion that the Site was once part of a deer park related to Boxted Hall and Moorhouse Farm was a park lodge for this. This evidence appears to derive from placenames on tithe mapping and a reference to woodland in part of the Site as Boxted Park. A small series of 18th and 19th century maps are included below to chart the labelling of this woodland in the Site.

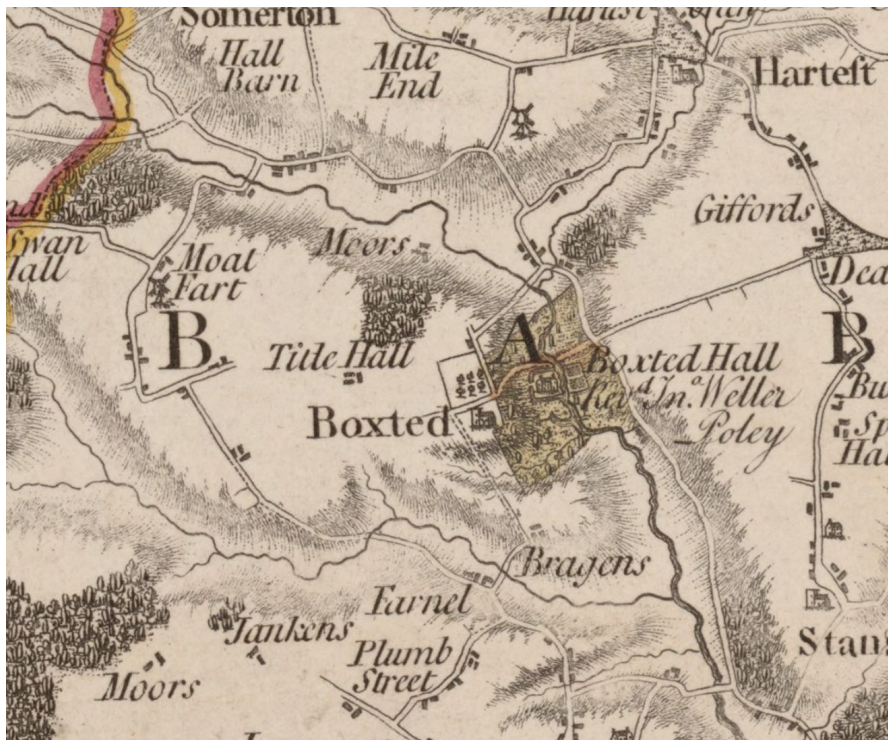


Plate 1 1783 Hodkinson Map of Suffolk showing Boxted and the block of woodland in the Site – note this is not labelled as Boxted Park.

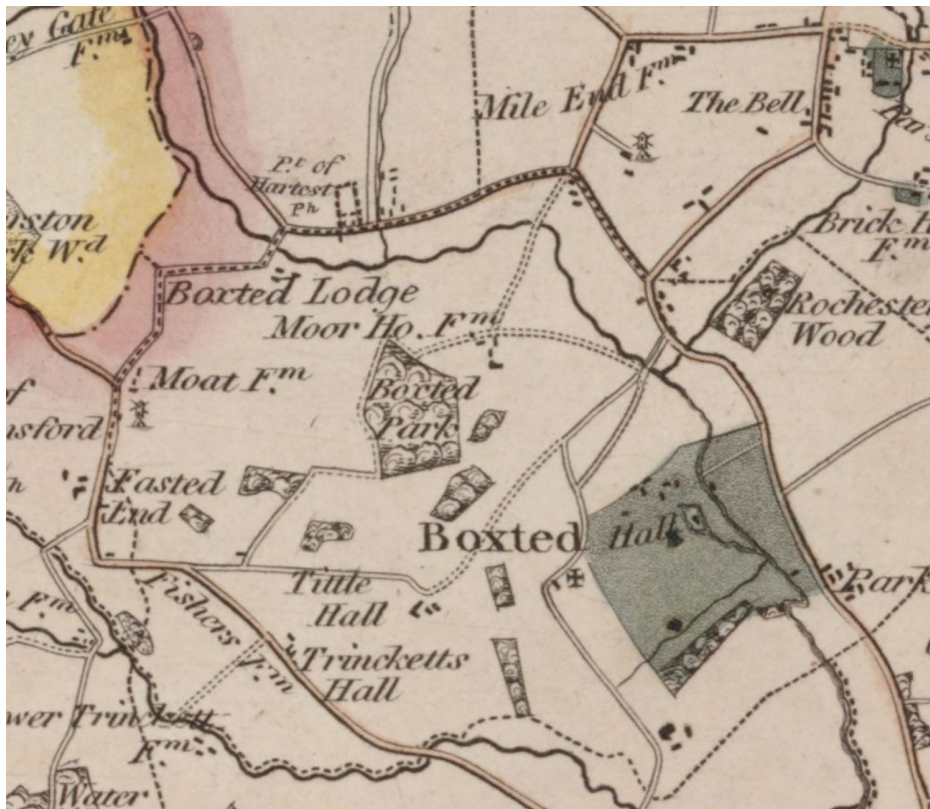


Plate 2 1826 Bryant Map of Suffolk showing woodland in Site labelled as Boxted Park located on western side of Site only



Plate 3 1825 Greenwood Map of Suffolk showing Boxted and area of parkland associated with Boxted shaded green – note the woodland is not labelled as Boxted Park



Plate 4 1810 and resurveyed in 1834 Ordnance Survey Old Series – note woodland in Site labelled Park wood and Boxted Park is clearly labelled in the surrounds of Boxted Hall

- 5.14. Looking at the mapping reproduced above, the only map to label the woodland within the western part of the Site as Boxted Park is the 1826 Bryant mapping. Even then, this woodland is demonstrably not the same shape or extent as that which survives today.
- 5.15. It is not disputed that the land within the Site once formed part of the wider Boxted estate, and may have once been part of a wider deer park, but in terms of what is on the Site today, there are no tangible surviving elements that survive in the form that they would have been whilst part of a medieval landscape. Elements such as field names on tithe maps – the solar scheme would not change this. The Scheme does not propose any mass reordering of the landscape and sits within the existing field pattern, on top of the fields. A possible deerpark boundary has been suggested at the eastern edge of the Site. This identification is unproven but in any case, the Scheme will not alter this boundary, or physically impact it in any way. The ability to understand this as a ditch will be retained by the Scheme.
- 5.16. A very important characteristic of the Site to consider in such discussions of historic association is the current character of the land. This is not a medieval parkland landscape. It is a modern, agricultural landscape formed and shaped to cater for modern agricultural needs and large machinery. Park Wood and Lownage Wood are identified as Ancient Woodland but looking at mapping such as the 1783 Hodskinson Map of the County of Suffolk, the blocks have been reshaped, thinned and managed as this map shows a large block of woodland in the centre of the approximate Site area, and not two discrete areas of woodland. The landscape has evolved and continues to change to the present day. What matters in terms of setting is to what extent can the historic setting of an asset be understood or is still eligible. It is argued that the fact of the Site being agricultural fields is not the same as a medieval deer park, or even as a remnant of medieval agricultural activity, given the division, woodland patterns and introduction/removal of pathways and tracks that has occurred in the previous centuries.
- 5.17. The most important consideration here is the temporary nature of the Scheme. The Scheme is reversible and temporary. There will be no permanent changing of the character of the landscape here. In relation to heritage assets, whilst 40 years is considered a long time in human terms, in the lifespan of a heritage assets, which is what the assessment of significance is concerned with, for the assets in question, 40 years is not a long time. These assets will continue exist within this landscape long after the solar farm is decommissioned.

Water Hall

- 5.18. The changes in layout do not make any material difference to the assessment of Water Hall as set out in the original Heritage Statement and restated in the Heritage Addendum.
- 5.19. The position of a low level of harm, not considered to be substantial is maintained. This harm arises from the temporary change in character of land in the eastern portion of the Site where there is partial intervisibility with the asset and allows the historic rural character to be appreciated. This harm is temporary and reversible upon the decommissioning of the Scheme.

Other Assets

- 5.20. The LPA Heritage Officer noted that Boxted Park required consideration in terms of this being a non-designated heritage asset. It is noted that the parkland is recorded on the HER and may be considered to have a significance commensurate with a non-designated heritage asset. However, aspects relating to views out of the parkland were considered in the original Heritage Addendum which noted that there are no designed views or carriage drives which look towards the Site. In terms of views from the Site looking towards the parkland boundary, firstly there are no publicly accessible areas from within the Site where such views would ordinarily be possible. Secondly, such views are not considered to contribute to the significance of the asset. Even where the Site formed historically part of the surrounding agricultural land, views from agricultural land towards the edge of a parkland some distance away would be of no significance. These views do not contribute to the understanding of any surviving features of the parkland or how it relates to Boxted Hall.
- 5.21. As such, even if the parkland were to be considered a non-designated heritage asset, it is not considered that this would experience any harm to its significance as a result of the Scheme. As historic mapping set out in the original Heritage Statement show, the Site does not form part of the historic parkland and is also some distance away from the defined edge as shown on many maps not least the HER polygon for the park. The immediate surroundings of the parkland would not experience any change and there would remain open, agricultural fields between the eastern edge of the parkland and the Site. It should be noted that the southeastern boundary of the Scheme is proposed to be edged with hedgerow planting, infilling gaps and being maintained to a height of 4m minimum. This means that any views from the parkland would be towards hedgerow planting, reinforcing the rural character of the area and any views from the Site would be screened by the same planting.
- 5.22. Comments in the LPA Heritage Officers' response regarding the potential for the parkland to be designated are of no merit here as the parkland is not designated and this should not be a factor in decision-making.
- 5.23. The conclusions for all of the other heritage assets discussed in the Heritage Addendum remain unchanged.

Other Considerations

- 5.24. The previous Heritage Addendum contained a discussion of legislation, case law and appeal decision of relevance to decision-making in the context of weight to be applied to harm to heritage assets in the planning balance, the need to consider the temporary nature of solar schemes and the fact that a finding of less than substantial harm (in the old NPPF language) does not provide a clear reason to refuse permission for a Scheme.
- 5.25. To address comments made in the 2025 consultation responses that raise new matters, it is noted that the SGV response at section 6 discusses lifespan and the temporary nature. They allege that the temporary nature of the Scheme should '*carry no weight*'. This is plainly wrong and contradicted by national policy, guidance and the decision letters of Planning Inspectors in consideration of solar schemes. On the contrary, the temporary nature and reversibility of solar schemes is a key consideration in decision-making.

- 5.26. In consideration of the temporary nature of the Scheme, in particular where harm has been identified to designated heritage assets, it is useful to refer to what is set out in the National Policy Statements (NPS) EN-3 (December 2025). Paragraph 2.10.142 & 143 of NPS EN-3 states:

“2.10.142 – The time limited nature of the solar farm, where a time limit is sought as a condition of consent, is likely to be an important consideration for the Secretary of State.

2.10.143 The Secretary of State should consider the period of time the applicant is seeking to operate the generating station, as well as the extent to which the site will return to its original state, when assessing impacts such as landscape and visual effects and potential effects on the settings of heritage assets and nationally designated landscapes.”

- 5.27. Further, at paragraph 2.10.152 it states:

“Solar farms are generally consented on the basis that they will be time-limited in operation. The Secretary of State should therefore consider the length of time for which consent is sought when considering the impacts of any indirect effect on the historic environment, such as effects on the setting of designated heritage assets.”

- 5.28. The Historic England Good Practice Advice in Planning Note 3: Setting of Heritage Assets 2017 sets out a non-exhaustive checklist when carrying out assessments of schemes which may affect the setting of assets at page 13 of the document. Within this checklist, it sets out that matters to be taken into account as part of assessment include:

“Permanence of the development

- ***Anticipated lifetime/temporariness;***
- ***Recurrence; and***
- ***Reversibility.”***

- 5.29. This approach has been taken by Inspectors in a number of recent Appeal decisions. including Land at Mussenden Lane, Horton Kirby (APP/G2245/W/25/3359260 July 2025). Harm was identified to four listed buildings arising from a change in character of the surrounding landscape which would slightly reduce the ability to appreciate the role the building played in the history of the locality. At §40, the Inspector noted: ***“This change in the local character, and the resultant harm, would be temporary and reversible.”*** The Inspector concluded that the harm to the heritage assets was outweighed by the benefits of that scheme.

- 5.30. This matter was also very recently addressed in an Appeal decision for Land east of Cobham Road and south of the River Mole, Cobham Road (3373058) along with the matter of the lifespan of a solar scheme in relation to the lifespan of heritage assets. At §40 of the decision, Inspector Ware states: ***“When considering the level of harm the fact that the proposal is for a 40 year period and is reversible is relevant. Although 40 years is a long period in human terms, it is a short period in terms of the life of the assets.”***

- 5.31. Taking into account the above guidance and NPS policy, it is clear that the temporary and reversible nature of solar developments are material considerations in decision-making when considering identified harms to the significance of heritage assets through changes to setting.
- 5.32. It has also been considered helpful to the decision-maker to provide information on previous appeal decisions in cases where harm is identified to the setting of designated heritage assets. These cases have established that where this harm does not affect the physical fabric of the asset, the harm will most often be of a relatively low scale. This approach has been confirmed by the 2022 Secretary of State for Levelling Up, Housing and Communities calling in the Appeal for Edith Summerskill House¹ who endorsed at paragraphs 11–15 of their letter the approach of the Inspector where it is set out in their Report at IR12.50:

“In cases where the impact is on the setting of a designated heritage asset, it is only the significance that asset derives from its setting that is affected. All the significance embodied in the asset itself would remain intact. In such a case, unless the asset concerned derives a major proportion of its significance from its setting, it is very difficult to see how an impact on its setting can advance a long way along the scale towards substantial harm to significance.”

¹ APP/H5390/V/21/3277137

6. NPPF 2026 Updates

- 6.1. The conclusions of the original Heritage Statement have been restated here with the updated NPPF 2026 conclusions.
- 6.2. All harm identified is not considered to be either total loss, or less than substantial and as such, the relevant NPPF 2026 policy test is set out at policy **HE6.4**. this requires:

“Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal.”

Asset	Pegasus Conclusions (in accordance with previous NPPF wording)	NPPF 2026 Conclusions
Moorhouse Farm	Less than substantial harm – low end of the spectrum	Low harm, not considered to be substantial
Water Hall	Less than substantial harm – low end of the spectrum	Low harm, not considered to be substantial
3 and 4 The Street	No harm	No effect on the significance of the asset
Thatched Cottages	No harm	No effect on the significance of the asset
Street Farm Cottage	No harm	No effect on the significance of the asset
Street House	No harm	No effect on the significance of the asset
Assets at Bosted Hall	No harm	No effect on the significance of the asset
Church of All Saints	No harm	No effect on the significance of the asset
Hare and Hounds	No harm	No effect on the significance of the asset
Somerton Hall	No harm	No effect on the significance of the asset
Hartest Conservation Area	No harm	No effect on the significance of the asset

Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales.

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