

# Tween Bridge Solar Farm

## 5.5.2 Appendix B: Heritage Assessment

Planning Act 2008  
Infrastructure Planning (Applications: Prescribed Forms  
and Procedure) Regulations 2009

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## ANNEX 1: Heritage Statement

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# 1. Introduction

- 1.1. This Heritage Statement forms part of the Planning Statement [Document Reference 5.5 Revision 5] for Tween Bridge Solar Farm (the Scheme).
- 1.2. Legislation and national planning policy, considered relevant to the determination of the DCO Application, identifies the need to present an assessment of harm to designated heritage assets affected by the Scheme and consider this in the decision as to whether to grant development consent. The purpose of this Heritage Statement is to set out the assessment of harm that the Scheme may have upon designated heritage assets, and those assets considered to be demonstrably of national significance. This is then used in the planning balance relating to the heritage national planning policy tests in the Planning Statement submitted alongside the DCO Application.
- 1.3. The Environmental Impact Assessment for Cultural Heritage is presented within ES Chapter 8: Cultural Heritage and Archaeology [APP-O45]. This Heritage Statement draws upon the information presented within the ES.
- 1.4. The assessment has considered the relevant policy tests set out in NPS EN-1 at paragraphs 5.9.22-5.9.36.
- 1.5. In cases where harm is less than substantial, NPS EN-1 paragraph 5.9.32 establishes a lower threshold for the need to demonstrate that the benefits of the scheme outweigh impacts on a designated heritage asset, stating that *“where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal...”*.
- 1.6. Paragraph 5.9.33 of NPS EN-1 states that *“in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”*.
- 1.7. Paragraph 4.2.16 of NPS EN-1 discusses how the Secretary of State will consider the balance of benefits and impacts in relation to CNP infrastructure (such as the Scheme) where the NPS (or any other planning policy) requires an outweighing of harm. This states that where residual impacts remain after the mitigation hierarchy has been applied, in all but the most exceptional circumstances the residual impacts will be outweighed by the urgent need for CNP infrastructure, and therefore *“...the Secretary of State will take as the starting point for decision making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances”*.
- 1.8. NPS EN-3 paragraphs 2.10.107 and 2.10.108 notes that solar PV developments can impact the setting of heritage assets as well as potentially having direct impacts on archaeological deposits. However, paragraph 2.10.110 also highlights that Solar PV development has the potential to result in a positive effect on heritage assets, for example, by removing fields from regular ploughing and utilising

shoes or low-level piling to protect archaeological deposits.

- 1.9. Paragraph 2.10.137 of NPS EN-3 states that the ability to microsite elements of solar development during construction should be an important consideration by the Secretary of State when assessing the risks posed by development on archaeology.
- 1.10. Paragraph 2.10.138 provides that the Secretary of State should consider granting consents allowing for micro-siting so that precise locations can be amended during

construction, for example where any previously unknown archaeology is discovered.

- 1.11. Paragraph 2.10.160 of NPS EN-3 requires the Secretary of State to take into account the length of time consent is sought for when considering indirect effects on the historic environment, including any effects the development may have on the setting of designated heritage assets.

## 2. Consideration of Asset Specific Impacts

- 2.1. There are no designated heritage assets within the Order Limits. The settings of four Grade II Listed Buildings have been identified within the assessment as being adversely affected by the Scheme during the Construction, Operational and Decommissioning phases. The assets are:
- Grove House Farmhouse (NHLE 1192934)
  - Sandhill Farmhouse (NHLE 1151565)
  - Dirtness Pumping Station (NHLE 1083284)
  - Dirtness Cottage (NHLE 1083285)
- 2.2. Without mitigation, the effects upon the significance of these assets were assessed as being less than substantial harm towards the lower end of the spectrum.
- 2.3. The potential for setting impacts to the assets were considered during Scheme design and appropriate mitigation was developed to minimise the scale of effect. The proposed mitigation includes offsets from solar arrays to retain open buffers around the assets and maintain key views and hedge/tree planting to screen views.
- 2.4. The application of the mitigation to the assets would reduce the scale of effect to less than substantial harm at the lowest end of the spectrum (not significant). The adverse effects would be temporary, for the duration of the Scheme.
- 2.5. In accordance with the test set out at paragraph 5.9.33 of NPS EN-1 and considering paragraph 4.2.16 of NPS EN-1 the temporary residual effects to the designated assets have been minimised and they do not therefore represent the most exceptional circumstances. This indicates that the residual impacts should be outweighed by the urgent need for CNP infrastructure in terms of the planning balance.
- 2.6. There are also three non-designated built-heritage assets identified within the assessment as being adversely affected by the Scheme during the Construction, Operational and Decommissioning phases. The assets are:
- Belton Grange (PEGO33)
  - Dale Mount Farm (PEGO64)
  - Drain House Farm (PEGO76)
- 2.7. The effects upon the significance of these assets were assessed as being minor harm (not significant). The potential for setting impacts to the assets were considered during Scheme design and appropriate mitigation was developed to minimise the scale of effect. The proposed mitigation includes offsets from solar arrays to retain open buffers around the assets and maintain key views and hedge/tree planting to screen views.
- 2.8. In accordance with the test set out at paragraph 5.9.33 of NPS EN-1 and considering paragraph 4.2.16 of NPS EN-1

the temporary residual effects to the non-designated assets have been minimised and they do not therefore represent the most exceptional circumstances. This indicates that the residual impacts should be outweighed by the urgent need for CNP infrastructure in terms of the planning balance.

2.9. Direct adverse effects have been identified in relation to 57 non-designated archaeological assets identified. The non-designated assets have been further sub-divided on the basis of their geographical importance (regional, county, local).

2.10. The non-designated assets of regional geographical importance are:

- Peat deposits and a Neolithic land surface (MLS21214)
- Thorne Mere (PEG209)

2.11. The effects upon the significance of these assets were assessed as being minor harm (not significant) as the parts of these assets within the Order Limits are only elements of wider deposits within the surrounding landscape. It is proposed to seek to minimise adverse effects upon these assets additional archaeological mitigation. The methodologies for additional mitigation are detailed in **Environmental Statement Appendix 8.6 Outline Archaeological Mitigation Strategy [APP-096]**.

2.12. The non-designated assets of county geographical importance are:

Subject to major harm (significant) without mitigation

- The buried remains of a crashed Lancaster bomber (MLS25882)
- The buried remains of a crashed Halifax bomber (PEG206)
- The buried remains of a crashed Wellington bomber (PEG207)

Subject to moderate harm (significant) without mitigation

- A Romano-British ditch and enclosure (MLS20927)
- Undated ditches and enclosure (MLS18348)
- Undated Enclosure (PEG208)
- Undated Enclosure (PEG212)
- Undated Enclosure (PEG213)
- Undated Enclosure (PEG214)
- Undated Enclosure (PEG216)
- Site of the bomb store at RAF Sandtoft (MLS26024)
- Site of a bombing decoy (MLS18438)
- Geophysical Anomaly – Parallel curvilinear ditches (PEG228)
- Geophysical Anomaly – Rectilinear enclosure? (PEG230)

- Geophysical Anomaly – Sub-circular enclosure (PEG232)
- Geophysical Anomaly – Small sub-circular enclosure (PEG233)
- Geophysical Anomaly – Parallel curvilinear ditches (PEG237)
- Geophysical Anomaly – Parallel linear ditches (PEG238)
- Geophysical Anomaly – possible settlement evidence (PEG249)

2.13. The effects upon the significance of these assets were assessed as being major or moderate harm without mitigation (**significant**) as the construction of the Scheme has the potential to directly impact sub-surface remains. To minimise adverse effects upon these assets additional archaeological mitigation is proposed. The methodologies for additional mitigation are detailed in **Environmental Statement Appendix 8.6 Outline Archaeological Mitigation Strategy [APP-096]**.

2.14. The application of mitigation will reduce the scale of effect in relation to the three assets subject to major harm to moderate harm with additional archaeological works undertaken in accordance with 1986 Military Remains Act. The residual effect is considered to be **not significant**.

2.15. The application of mitigation will reduce the scale of effect in relation to the 16 assets subject to moderate harm to minor harm (**not significant**).

Subject to minor harm without mitigation

- Cropmark enclosure visible on aerial photograph (PEG217)
- Hatfield Chase (PEG223)
- Thorne Moors (PEG224)
- Crowle Common (PEG225)
- Isle of Axholme LC14 Policy Area (PEG218)

2.16. The effects upon the significance of these assets were assessed as being minor harm (not significant) as the parts of these assets within the Order Limits are only elements of wider deposits within the surrounding landscape. To seek to minimise adverse effects upon these assets additional archaeological mitigation is proposed. The methodologies for additional mitigation are detailed in **Environmental Statement Appendix 8.6 Outline Archaeological Mitigation Strategy [APP-096]**.

2.17. The non-designated assets of local geographical importance are:

- Site of warping drain (MLS2491)
- Site of Medge Hall Farm (MLS25262)
- Site of Lover's Ground Farm (MLS25265)
- Site of Boarding House Farm (MLS25281)
- Site of un-named Farmstead (MLS25555)

- Site of duck decoy pond (PEG200)
  - Site of Sandhill Cottage (PEG202)
  - Site of Redhouse Cottage (PEG203)
  - Site of Elmhirst Cottage (PEG205)
  - Remains of peat tramway (PEG211)
  - Site of Pond (PEG215)
  - Ditches, possible enclosure, Belton Grange (MLS18343)
  - Geophysical Anomaly – Linear ditch (PEG226)
  - Geophysical Anomaly – Linear ditch (PEG227)
  - Geophysical Anomaly – Pond? (PEG229)
  - Geophysical Anomaly – Peat Railway line (PEG231)
  - Geophysical Anomaly – Series of ditches (PEG234)
  - Geophysical Anomaly – Series of ditches (PEG235)
  - Geophysical Anomaly – Series of ditches (PEG236)
  - Geophysical Anomaly – Series of ditches (PEG239)
  - Geophysical Anomaly – Linear ditches; trackway? (PEG240)
  - Geophysical Anomaly – Linear ditches (PEG241)
  - Geophysical Anomaly – Series of drainage ditches (PEG242)
  - Geophysical Anomaly – Curvilinear ditch (PEG243)
  - Geophysical Anomaly – Curvilinear ditch (PEG244)
  - Geophysical Anomaly – remains of Crow Tree Cottage (PEG246)
  - Geophysical Anomaly – linear ditches (PEG247)
  - Geophysical Anomaly – rectilinear enclosure (PEG248)
- 2.18. The effect upon the significance of these assets was assessed as being minor harm (**not significant**). Given the minor harm identified to these non-designated heritage assets the assessment noted that archaeological mitigation would not reduce the scale of effect in relation to these assets.
- 2.19. The scale of direct effects reported in the assessment has used a worst-case scenario which assumes a greater degree of loss to the archaeological remains than is likely to be the case following detailed design.
- Summary
- 2.20. The combination of the inherent flexibility of many elements of a solar development and the methodologies for additional mitigation detailed in **Environmental Statement Appendix 8.6 Outline Archaeological Mitigation Strategy (AMS) [APP-096]** allow for adverse effects to archaeological remains to be minimised. The

- Outline AMS is secured by Requirement 12 in the Draft DCO [Document Reference 3.1 Revision 4].
- 2.21. The Outline AMS identifies the possibility of preservation in situ of archaeological remains within the Order Limits. This would be achieved through either, no-dig foundations for solar arrays or areas excluded from development. The Outline AMS presently details an exclusion zone due to the presence of complex Roman archaeology.
- 2.22. Where solar arrays will have push-pin foundations the scale of effect upon below-ground archaeological remains is minimal.
- 2.23. In areas of more intrusive elements of the Scheme (such as cable runs, BESS facilities or Substations) archaeological mitigation will likely take the form of preservation by record (trenching, watching brief or excavation).
- 2.24. The application of the mitigation to the assets would reduce the scale of effect the extent that it is not significant.
- 2.25. As well as detailing mitigation methods, the OutlineAMS details that the Scheme will consider micro-siting elements of solar development during construction to allow for the further minimisation of direct adverse effects to archaeological remains in accordance with paragraphs 2.10.137 and 2.10.138 of NPS EN-3.
- 2.26. In accordance with the test set out at paragraph 5.9.33 of NPS EN-1 and considering paragraph 4.2.16 of NPS EN-1, the residual effects to the non-designated assets have been minimised and they do not therefore represent the most exceptional circumstances. This indicates that the residual impacts should be outweighed by the urgent need for CNP infrastructure in terms of the planning balance.

### 3. NPS EN-1 Policy Assessment

Paragraph 5.9.22

*'Where there is a high probability (based on an adequate assessment) that a development site may include as yet undiscovered heritage assets with archaeological interest, the Secretary of State will consider requirements to ensure appropriate procedures are in place for the identification and treatment of such assets discovered during construction.'*

- 3.1. The Applicant has taken into account, through detailed assessment, that the Order Limits contain non-designated archaeological remains and have the potential to contain further, unidentified heritage assets with archaeological interest. To ensure any archaeological remains are addressed appropriately the Applicant has provided **ES Appendix 8.6 Outline Archaeological Mitigation Strategy (AMS) [APP-096]** which it is proposed will be secured by Requirement 12 of the **Draft DCO [Document Reference 3.1 Revision 4]**.

Paragraph 5.9.23

*'In determining applications, the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development, including by development affecting the setting of a heritage asset, taking account of:*

*Relevant information provided with the application and, where applicable, relevant information submitted during the examination of the application;*

*Any designation records, including those on the National Heritage List for England, or included on Cof Cymru for Wales;*

*Historic landscape character records;*

*The relevant Historic Environment Record(s), and similar sources of information;*

*Representations made by interested parties during the examination process; and*

*Expert advice, where appropriate, and when the need to understand the significance of the heritage asset demands it.'*

- 3.2. The Applicant has undertaken a detailed assessment that includes the identification and particular significance of any heritage assets that may be affected by the proposed development. As well as available information, noted within the bullet points at paragraph 5.9.23, the Applicant has commissioned additional surveys to ensure the robustness of the assessment presented.

Paragraph 5.9.25

*'In considering the impact of a proposed development on any heritage assets, the Secretary of State should consider the particular nature of the significance of*

***the heritage assets and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the proposal.'***

- 3.3. The Environmental Statement clearly articulates the significance of heritage assets within the Order Limits or study area that may be impacted by the proposed development. The potential adverse effects upon built-heritage assets have been used to inform the design, which incorporates landscape mitigation to minimise setting affects to both designated and non-designated built-heritage assets.
- 3.4. **Environmental Statement Appendix 8.6 Outline AMS [APP-096]** which it is proposed will be secured by Requirement 12 of the Draft DCO seeks to minimise direct adverse effects upon archaeological remains within Order Limits.
- 3.5. The Outline AMS identifies the possibility of preservation in situ of archaeological remains, preservation by record and the use of micro-siting of elements of solar development during construction to allow for the further minimisation of direct adverse effects to archaeological remains.

Paragraph 5.9.28

***'When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm***

***amounts to substantial harm, total loss, or less than substantial harm to its significance.'***

- 3.6. No Substantial harm to Grade II Listed Buildings has been identified. Less than substantial harm to four Grade II Listed Buildings has been identified with landscape mitigation included within the design to minimise these adverse effects to the lowest end of the less than substantial harm spectrum.

Paragraph 5.9.29

***'The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.'***

- 3.7. The Applicant has minimised adverse effects to designated assets through mitigation embedded in the design. The residual, less than substantial harm identified, should be outweighed by the urgent need for CNP infrastructure in terms of the planning balance.
- 3.8. **The Outline AMS** seeks to minimise direct adverse effects upon archaeological remains within Order Limits.
- 3.9. The Outline AMS identifies the possibility of preservation in situ of archaeological remains, preservation by record and the use of micro-siting of elements of solar development during construction to allow for the further minimisation of direct adverse effects to archaeological remains.

Paragraph 5.9.30

***‘Substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional.’***

- 3.10. No Substantial harm to Grade II Listed Buildings has been identified. Less than substantial harm to four Grade II Listed Buildings has been identified with landscape mitigation included within the design to minimise these adverse effects to the lowest end of the less than substantial harm spectrum.

Paragraph 5.9.31

***‘Substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II\* Listed Buildings; grade I and II\* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional.’***

- 3.11. No heritage assets of the highest significance are affected by the proposed development.

Paragraph 5.9.32

***‘Where the proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss, or all the following apply:***

- ***The nature of the heritage asset prevents all reasonable uses of the site;***

- ***No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;***
- ***Conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and***
- ***The harm or loss is outweighed by the benefit of bringing the site back into use.’***

- 3.12. No substantial harm to a designated heritage asset arises from the Scheme.

Paragraph 5.9.33

***‘Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use.’***

- 3.13. In accordance with the test set out at paragraph 5.9.33 of NPS EN-1 and considering paragraph 4.2.16 of NPS EN-1 the residual effects to the non-designated assets have been minimised and they do not therefore represent the most exceptional circumstances. This indicates that the residual impacts should be outweighed by the urgent need for CNP infrastructure in terms of the planning balance.

Paragraph 5.9.34

***‘In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced***

***judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'***

- 3.14. The scale of harm to assets has been minimised with appropriate mitigation by design and additional mitigation detailed in **Outline AMS Archaeological Mitigation Strategy**. The less than substantial harm, arising through changes to setting, to four Grade II Listed Buildings is at the lowest end of this spectrum and is temporary. Direct impacts to archaeological remains will be minimised through preservation in situ, micro-siting and preservation by record.

Paragraph 5.9.35

***'Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the***

***significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 5.9.30 or less than substantial harm under paragraph 5.9.31, as appropriate, considering the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.'***

- 3.15. The test set out at paragraph 5.9.35 is not pertinent in this instance.

Paragraph 5.9.36

***'Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the Secretary of State should not take its deteriorated state into account in any decision.'***

- 3.16. The test set out at paragraph 5.9.36 is not pertinent in this instance.

## 4. Conclusion

- 4.1. Both NPS EN-1 and the NPPF require an assessment of harm to heritage significance. Both NPS EN-1 and the NPPF further categorise that harm into 'substantial' and 'less than substantial'
- 4.2. This assessment has concluded that the residual impacts to heritage assets are not significant in EIA terms. The Scheme will therefore result in less than substantial harm to the identified heritage assets. The assessment set out in this Heritage Statement has been used to inform the planning balance set out in the Planning Statement [Document Reference 5.5 Revision 5].

**Birmingham (City)**

39 Bennetts Hill, Birmingham, B2 5SN

T 0121 308 9570

Birmingham@pegasusgroup.co.uk

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