

Dean Moor Solar Farm Cultural Heritage Technical Note

on behalf of FVS Dean Moor Limited

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DEAN MOOR SOLAR FARM CULTURAL HERITAGE TECHNICAL NOTE PLANNING INSPECTORATE REFERENCE EN010155 PREPARED ON BEHALF OF FVS DEAN MOOR LIMITED

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1 Cultural Heritage Technical Note

1.1 Project Background

- 1.1.1 The Dean Moor Solar Farm DCO application (EN010155) was submitted to the Planning Inspectorate on 26 March 2025 and was accepted for Examination on 15 April 2025.
- 1.1.2 The period for registering as an Interested Party, through the submission of a Relevant Representation (RR) ran from 30 April 2025 to 19 June 2025. As a statutory consultee, Historic England submitted an RR [RR-016]. The RR (paragraph 4) included commentary regarding the methodology within the submitted Historic Environment Desk-Based Assessment (HEDBA) (ES Appendix 6.1) [APP-012] and ES Chapter 6 Cultural Heritage [APP-037]. This stated that:
- 1.1.3 'Table 2.1 Grade II listed buildings and Grade II Registered Parks and Gardens should be placed in the 'High' category and not the 'Medium' category. Para 2.2.8 makes reference to the use of Design Manual for Roads and Bridges LA 106 as it 'provides a useful framework for cultural heritage assessment'. As such, the criteria contained within Design Manual for Roads and Bridges LA104 would have been more appropriate which assigns a 'High' value to receptors of 'national scale'. Grade II listed buildings are designated to their architectural or historic interest on a national scale (as are Grade II Registered Parks and Gardens).'
- 1.1.4 This note considers the view from Historic England in regard to the methodology of the submitted HEDBA and ES Chapter 6 Cultural Heritage. This note is provided to the Examining Authority to show that the conclusions of the ES are robust.

1.2 ES Chapter 6 Assessment Methodology

1.2.1 Details of the methodology are set out in full within section 2.3 of the submitted HEDBA and section 6.3 of the ES Chapter. These documents have been revised for clarity following consultation and advise that the



assessment methodology for appraising sensitivity/value is an exercise of professional judgement informed by best practice guidance, and an evidence base comprising desk-top research of primary and secondary source material, together with a visit to the Site and the surrounding area. Source material consulted as part of this exercise included historic Ordnance Survey ('OS') maps, archival records, and interrogation of historic photographs and other online sources.

- 1.2.2 Sensitivity of cultural heritage receptors was assigned on a basis which is consistent with the methodology as presented within ES Chapter 6 Cultural Heritage [APP-037]. This methodology adapts Table 3.2N in LA104 and Appendix 3A of the 2011 ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties¹ to ensure a proportionate assignment of 'value' categories in response to each class of historic environment asset. This approach ensures that the methodology set out in ES Chapter 6 [aligns with the overarching EIA methodology for the ES as detailed in ES Chapter 2 EIA Methodology [APP-033] (see Table 1 below). The assignment of value set out in the methodology in ES Chapter 6 is also consistent with other methodologies for recently granted solar DCO applications, such as Cottam Solar Farm, Sunnica Energy Farm, and Byers Gill Solar Farm.
- 1.2.3 In the context of the methodology used, Historic England (HE) have not queried any other matter than the grading for establishing value / sensitivity.

Table 1: Criteria for establishing sensitivity / value of heritage receptors

Sensitivity / Value	Receptor Categories			
High	Receptors of inscribed international value, such as world heritage sites;			
	Grade I and grade II* listed buildings;			
	Grade I and grade II* registered parks and gardens;			
	Scheduled monuments;			
	Registered battlefields;			
	Conservation areas containing important buildings; and			
	Undesignated archaeological receptors of clear national or international value.			
Medium	Grade II listed buildings;			



	Conservation areas; Grade II registered parks and gardens;					
	Undesignated buildings, monuments, sites, or landscapes that can be demonstrated to have heritage value equivalent to the designation criteria; and					
	Designated or undesignated archaeological receptors or sites that have regional interest.					
Low	Locally listed buildings as recorded on a local authority list;					
	Undesignated buildings, monuments, sites, or landscapes that can be demonstrated to have heritage value equivalent to the local listing criteria; and					
	Archaeological receptors of limited value but with a potential to have interest at a local level.					
Very low	Buildings, monuments, sites, or landscapes identified as being of negligible or no historic, evidential, aesthetic, or communal interest; and					
	Archaeological receptors that have little or no surviving archaeological interest.					

- 1.2.4 Further engagement with HE has been undertaken in relation to this point. Officers at HE has suggested that a five-point scale would be more appropriate. As noted above in paragraph 1.2 above, it is the view of HE that this approach would be more appropriate given the reference made to the Design Manual for Roads and Bridges (DMRB) LA106² within the methodology of the HEDBA and Chapter 6. HE considers that by introducing an additional 'Sensitivity / Value' of "Very High" would align with guidance set out in DMRB LA104.
- 1.2.5 This approach would change the Criteria for Establishing sensitivity/value of Heritage Receptors and the Effect Significance Matrix as shown in **Tables 2 and 3** below.

Table 2: Amended Criteria for Establishing sensitivity/value of Heritage Receptors (adapted from DMRB LA104)

Sensitivity / Value	Receptor Categories			
Very High	Receptors of inscribed international value, such as world heritage sites			
High	Grade I and grade II* listed buildings;			
	Grade II listed buildings;			
	Grade I and grade II* registered parks and gardens;			
	Grade II registered parks and gardens;			
	Scheduled monuments;			
	Registered battlefields;			
	Conservation areas containing important buildings; and			
	Undesignated archaeological receptors of clear national or international value.			



Medium	Conservation areas;				
	Undesignated buildings, monuments, sites, or landscapes that can be demonstrated to have heritage value equivalent to the designation criteria; and				
	Designated or undesignated archaeological receptors or sites that have regional interest.				
Low	Locally listed buildings as recorded on a local authority list;				
	Undesignated buildings, monuments, sites, or landscapes that can be demonstrated to have heritage value equivalent to the local listing criteria; and				
	Archaeological receptors of limited value but with a potential to have interest at a local level.				
Very low	Buildings, monuments, sites, or landscapes identified as being of negligible or no historic, evidential, aesthetic, or communal interest; and				
	Archaeological receptors that have little or no surviving archaeological interest.				

Table 3: Significance of Effect Matrix

	Sensitivity/value				
Magnitude	Very High	High	Medium	Low	Very Low
Major	Major	Major	,	Moderate or Minor	Minor
Moderate	Major	Major or Moderate	Moderate	I\/lin∩r	Minor / Neutral
Minor	Major or Moderate	Moderate or Minor	Minor		Minor / Neutral
Negligible	Minor	Minor	Neutral / Minor	Minor / Neutral	Neutral
No Change	Neutral	Neutral	Neutral	Neutral	Neutral

1.2.6 The five-point scale, while differing from the scale given in Table 2.2 of the submitted ES Chapter 6 – Cultural Heritage reflects the Table 3.8.1 Significance Matrix given in Environmental Assessment methodology in LA104.



2 Impact Assessment

- 2.1.1 When considered against the methodology proposed by HE, there would be no changes to the significance of effect assessed within the submitted ES Chapter 6 Cultural Heritage for any of the identified heritage receptors, with the exception of the Grade II Listed 'Wythemoor Sough and Adjoining Barn and Stable' (List Entry No: 1327185) (Wythemore Sough).
- 2.1.2 This is as a result of the Grade II Listed Building being ascribed a value of 'High Sensitivity' as opposed to 'Low Sensitivity' under the amended methodology suggested by HE. The paragraphs below set out a summary assessment of the magnitude of impact arising from the Proposed Development on this designated heritage receptor

2.2 Assessment of Impact

- 2.2.1 Sough comprises a Grade II listed farmhouse, stables, and barn, all under a graduated green slate roof. The structures' architectural and historical significance lies in its character as an 18th century vernacular farmhouse that retains its traditional rural character. The buildings are constructed of local stone which has been rendered and painted in areas. The barn has a projecting cart entrance, and the return wall has pigeon openings which further reflect its use as an agricultural building.
- 2.2.2 The setting of Wythemoor Sough comprises of the buildings' curtilage which includes modern barns and a residential garden. The plot of land in which the building sits has been reduced since its depiction on the 1889 OS Map. The wider setting of the receptor is comprised of the agricultural landscape (including the Site) which has undergone substantial change with a history of farming and periods of mining within the area throughout the 19th and 20th centuries. The land which comprises the Site does not make a substantial contribution to the setting of this receptor, rather it is the immediate setting and land parcel from which the receptor is best appreciated.



- 2.2.3 The receptor is situated approximately 150m from the Site boundary. The farmhouse has extensive views across the adjoining landscape, due to the surrounding topography; with the farmhouse situated on a slope which falls away towards Dean Moor. The views from the rear of the property looking across the Site will be affected by the Proposed Development. Whilst the panels comprise low level infrastructure, they will foreshorten long-distance views, resulting in a change to the characteristics of the receptor setting and eroding the rural open nature of the landscape
- 2.2.4 The landscape mitigation proposes a green infrastructure buffer, which has been included within the Works Plans [APP-007] and is reinforced by proposals in the Landscape Strategy Plan (LSP) (ES Figure 7.6.1 7.6.5) [APP-088]. This buffer surrounds the part of the Site in closest proximity to the receptors with proposals to include new landscape structural elements (trees/scrub) to help screen the most direct near-distance views.
- 2.2.5 The LSP also includes reinforcement of existing hedgerow field boundaries across Areas A and B, which are expected to also help break up views and prevent a 'block' appearance. As per the Design Parameters Document (DPD) [APP-049] the Solar PV infrastructure (Work No. 1) will have vegetated 'aisles' between rows of solar panels which to avoid the appearance of a continuous façade, especially when viewed from a partial or full side elevation of the arrays which will be oriented with panel facades facing south, as is the case from this receptor to the west/north-west.
- 2.2.6 These measures ensure that the visual impact from the closest panels (located at approximately 150m from the receptor) is reduced. In summary, it is considered the proposed landscape mitigation would minimise the impacts caused by the Proposed Development.
- 2.2.7 The Proposed Development will not result in any direct impacts to the receptor; however, it is acknowledged that the introduction of solar panels within the Site will result in a change in character to the wider landscape setting of the receptor. However, this landscape has experienced notable change since the farmhouse's construction with the large-scale mining in



the 1990s and the addition of the Wind Farm within the area, which has altered the rural characteristics of the landscape. Overall, the changes to the wider setting of the receptor which will have an effect on the receptor's significance. It is judged the magnitude of impact would be moderate.

- 2.2.8 Taking into account both methodologies (the existing ES and the suggested methodology from HE), it is concluded that a moderate magnitude of impact to either a receptor of medium sensitivity (existing methodology) or high sensitivity (suggested methodology), the significance of effect would remain **moderate adverse**.
- 2.2.9 It is noted that in the methodology suggested by HE, a moderate magnitude of impact can result in either a major or moderate significance of effect. It is then a case of professional judgement to determine the level of effect arising from a proposal. For the Proposed Development it is concluded that the significance of effect would remain moderate adverse. This is due to the fact that a major adverse effect would usually necessitate an effect whereby the value of the receptor is totally altered or destroyed. In the case of this assessment there will be no direct physical impact on the receptor and the proposed landscape strategy will reduce a perceived visual impact. Therefore, the significance of effect as **moderate** adverse is considered proportionate and appropriate. This is considered to be equivalent to 'less than substantial harm' in relation to paras 215 of the National Planning Policy Framework (NPPF). This conclusion has been supported in discussions with Historic England (14th August 2025) as per the draft Statement of Common Ground (dSOCG).