



Historic England

Ms Alison Down
The Planning Inspectorate
3D Eagle Wing
Temple Quay House
Bristol
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Direct Dial: [REDACTED]

Our ref: PL00794571

11 December 2023

Dear Ms Down

Thank you for consulting us on the scoping report for the Rosefield Solar Farm.

This development could, potentially, have an impact upon a number of designated heritage assets and their settings. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

We note the summary of designated and undesignated assets in the scoping report and the assets specifically scoped into the report under paragraph 6.4.8. Whilst we are pleased to see that these assets have been included, we are concerned that the report seeks to scope out all other assets under paragraph 6.4.9.

We are particularly concerned that two Scheduled Monuments in close proximity to the application site have been scoped out. The Scheduled Monument known as 'Preceptory of the Knights Hospitallers, associated fishponds, medieval settlement of Hogshaw and the site of the medieval church of St John the Baptist, 200m south of Hogshaw Farm' (1405586) is located just outside the application, whilst the deserted village at Fulbrook Farm Scheduled Monument (List Entry Number: 1006939) lies within 1km of the site. Both these assets take some of their significance from the surrounding agricultural fields which reflect their original rural setting. Depending on the layout of the Proposed Development, there is the potential for the setting of these assets to be effected and therefore we recommend these are brought within the scope of the assessment.

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. Assessment and evaluation of the historic should be carried out at as early stage as possible so that the information can feed into your design. For the below-ground archaeological remains we understand a programme of geophysical survey and trial trenching will be undertaken to fully assess the archaeological potential of the site.



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We would strongly recommend that you involve the Conservation Officers and the archaeological staff at Buckinghamshire Council in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

A large proportion of the proposed solar development would sit on hills and a ridgeline, which give a subtle undulating characteristic to the landscape. This is visually important in its own right because the coherence of long-ranging views over fields of varying shapes and sizes and ancient wood banks, set within a network of driveways and sunken lanes, enables us to understand the lengthy agricultural history of the area. West of this ridgeline the landscape is relatively low lying and so there is the potential for the development to have far reaching impacts when looking back towards the site from the west. As well as expected viewpoints as identified in the scoping report, it's important therefore that wider views are also assessed. We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.

With that in mind we agree with the comments recently made by Buckinghamshire's conservation officer that there may be heritage assets, including highly graded assets that derive significance from views over wide expanses of rural landscape (e.g. Grade I Waddesdon Manor RPG). or borrow the wider rural landscape, far beyond the defined boundaries of the asset, to terminate important vistas (e.g. Grade I Wotton House RPG). We therefore recommend where there is intervisibility between heritage assets and the proposed development or the development changes the experience of the asset in the landscape, those assets should be scoped into the assessment process.

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this. In particular, photographs with wirelines/ shaded areas showing location of solar array and other above ground units from key points should be included. Where there is possibility that glint and glare from the solar array could be visible within sensitive historic views we recommend a glint and glare assessment takes place and is included in submission documents.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of



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alterations to drainage patterns that might lead to *in situ* decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

The EIA should be cross-referenced and internally coherent - the cultural heritage chapter should not be a stand-alone exercise but should refer to and make use of the findings of the landscape and visual assessment. Significant heritage assets should be considered in the LVIA as sensitive receptors.

The applicant's heritage consultants have contacted Historic England to initiate discussions and pre-application advice - we welcome this.

Please note these specific points from the scoping report.

6.4.6 - It does not seem that the possibility of damage particularly to archaeological deposits during decommissioning can be dismissed, especially at a distance of 40 years into the future. Some consideration should be given to this.

6.4.9 - We do not think the setting of heritage assets can be defined to their immediate environs or is necessarily restricted to if there is intervisibility between the asset and the development at that time. Our published guidance *The Setting of Heritage Assets; Historic Environment Good Practice Advice in Planning: 3 (2nd Edition)* (page 6) sets out that the setting of heritage assets are the 'surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'. It goes on to add that as well as visual considerations, our experience of assets is influenced by other factors such as 'noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places'. To give an example, the contribution that rural environs make to a heritage asset's significance (e.g. to medieval rural parish church) is not negated because a hedge separates the asset from those environs. Therefore a change to those rural environs is a potential impact on the significance of the asset.

6.4.10 If land for mitigation is to include new planting and screening consideration should be given to if this would have its own visual impacts and is appropriate for the historic character of the landscape. Landscaping usually remains after the solar array has been disassembled and therefore should be considered a more permanent impact. Also, such planting could potentially be damaging to archaeological remains and the land may therefore require geophysical survey.

6.6.1 We are pleased that an LVIA and series of photomontages will be produced. Historic England would be happy to be consulted and aid in the selection of these viewpoints, alongside Buckinghamshire Conservation officers.

Yours sincerely,



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