



**HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND
(HBMCE)**

(HISTORIC ENGLAND)

Application by

Lime Down Solar

PINS Reference No. EN010168

HBMCE Reference No. PL795841

Answers to Examining Authority's First Written Questions (ExQ1)

Deadline 3: 15th June 2026

HISTORIC ENGLAND'S RESPONSE TO THE EXAMINING AUTHORITIES FIRST WRITTEN QUESTIONS.

CH1.2 Heritage Visualisations

Paragraph 4.5.1 of ES Appendix 12-1 (Heritage Statement) [APP-219] states that heritage visualisations were agreed with Wiltshire Council on January 2024 (Annex E). However, Annex E only provides a list of heritage viewpoints. Can the applicant please direct the ExA to where the visualisations for these viewpoints are provided? If they have not been provided with the application material, then these are to be provided in response to this ExQ. Historic England and Wiltshire Council are also invited to suggest additional visualisations which they consider should be provided by the applicant to assist the examination, and may find the following documents helpful to inform their consideration – ES Figure 8-10 [APP-099] and ES Figure 12-1 [APP-143]. The applicant is subsequently requested to provide the additional visualisations or justification as to why not

HE are satisfied all the visualisations needed have been provided to enable us to make an assessment of harm on Bradfield Manor. We will not be requesting any further visualisations from additional viewpoints.

CH1.6 Magnitude of Effects

Can Historic England and Wiltshire Council confirm if they are satisfied with the applicant's methodology for assessing the impact of the proposed development on heritage assets, particularly the criteria for determining the magnitude of effects, as set out in Table 12-4 of ES Chapter 12 [APP-064]?

We are satisfied with the methodology used.

CH1.9 Duration of Harm

The applicant states that the proposed development has the potential to indirectly impact heritage assets, but any such effects would be reversible following decommissioning of the proposal. The ExA is concerned about the inference that because the proposal has a capped 60 year duration, the ensuing harm to heritage assets is somehow nullified. The issue around whether a 60 year use is 'temporary' cuts across most topic areas, however, specifically for heritage, the ExA requires a clear position from the applicant on the weight they have ascribed to a time capped DCO when assessing the level of harm to heritage assets.

Historic England and Wiltshire Council may also wish to comment on this matter

While there appears to be no definition of temporary, in terms of time scale within the planning system, we consider that 60 years is a substantial lifespan for any form of development and may not be considered temporary, even if the decommissioning of the development occurs after this time.

We consider that the principal consideration is that the identified harm would be effective for the length of the proposed development. We therefore give limited weight to the time-capped DCO in terms of heritage impacts.

We would refer you to our *Commercial Renewable Energy Development* advice note in particular the section on *Duration and Decommissioning* paragraphs 63 and 64 ([Commercial Renewable Energy Development and the Historic Environment](#)). This identifies that a 25-30 year temporary permission is effectively a generation so will not seem temporary to the local population. As this is proposed for 60 years that would equate to two generations.

We would also refer you to the recently published *Archaeology and Solar Farms Good Practice Guide* [Archaeology-and-Solar-Farms-GPG](#). Section 3.8 *Lifespan of a solar farm* deals with impacts on archaeology. Any direct impacts on archaeology will be permanent. It also looks at decommissioning and what this means for any archaeology preserved within the scheme.