

Dear Sirs,

Thank you for consulting Historic England in relation to this project.

We note we have been named in EXQ1 in relation to Q11.1.1, Q11.0.3 and Q11.0.6 and have provided responses below.

Q11.1.1

Question:

Heritage assessment –
intervisibility

The assessment of significance in section 4 of appendix 12A [AS-053] excludes effects on the settings of various designated and non-designated heritage assets on that basis that there is no current intervisibility between the site and the various assets.

Considering the history of the area, as demonstrated in the various maps submitted, and historic and contextual connections, could HE and NWLDC

- confirm whether they agree with the applicants' assessment in this regard
- whether any different conclusion arises in respect of the MCO application, having regard to the increase in permitted crane height
- if either HE or NWLDC does not agree, identify the heritage asset(s) (or categories of assets) for which setting effects should be reconsidered, including where setting contribution is derived from historic/ contextual connections beyond intervisibility

With specific regard to the increase in crane height, given the existing cranes at approximately 20m in height, we are not of the position that an increase in height of 4m would present substantially different conclusions.

Upon review of the assessment available, there are assets we would draw specific attention to for discussion of impacts.

We note the submitted Built Heritage Statement states the 'Built Heritage Statement concludes that the development of the EMG2 Works will likely result in a medium level of less than substantial harm to the significance of the Grade II* listed Church of St Michael and All Angels and a low level of less than substantial harm to the significance of Diseworth Conservation Area'.

We would agree that the closely grained nature of Diseworth conservation area does provide some screening in terms of the assets within it, however, we consider that the holistic experience of the approach from north east on Hynam's Lane to the Conservation Area and its contribution to the significance and character of the Conservation Area should be considered further, further to assessment to our guidance (GPA3) when considering design and mitigation. This should also consider the Church of St Michael and All Angels in the centre of Diseworth, given the applicants own assessment that the 'legibility is mainly signified by the landmark presence of the Church spire'. Impact to the conservation area and the church of St Michael and All Angels should be considered holistically in terms of kinetic experience and their group value.

Regarding St Mary and Hardulph church, the applicant states that the proposal would result in 'no meaningful impact on the asset's significance'. However, we suggest that the experience, through introduction of competition in the skyline would result in harm to significance. The elevated nature of the site, and the long ranging views that are experienced from atop the landscape promontory would be affected. The level of harm may be towards the lower level of less than substantial harm, however it would nevertheless result in harm. The presence of modern infrastructure in the modern landscape does not detract from the level of harm that the asset would experience through further change, and thus should be assessed proportionately.

Overall, we would agree with the assessment of less than substantial harm to both the Diseworth conservation area and St Michael and All Angels Church, but suggest that harm to St Mary and Hardulph church should also be considered further. Where harm falls within the spectrum of less than substantial harm to the identified designated assets' significance, paragraph 215 of the NPPF states harm should be weighed against the public benefits of the proposal.

Q11.0.3

Heritage assessment

Does either HE or NWLDC consider that any of the archaeological features identified within the EMG2 site are of equivalent significance to scheduled monuments so that they should be treated as if they were designated heritage assets. If so, could you please identify the feature(s)/ area(s) and explain your reasoning.

We would not be of the opinion that there are demonstrably archaeological features of equivalent significance to scheduled monuments present within the site. While our advice often refers to footnote 75 of the National Planning Policy Framework, in this instance, we are not aware of any archaeological remains that are of equal significance and should be treated as such. Historic England has referred the applicant to expertise of the County Council Archaeological Officer all below ground archaeological matter and has not raised its own issues in this respect. Historic England have not commented on the content of various environmental management plans (CEMP etc) but these will need to be aligned to address those setting issues currently in discussion and address also such archaeological matters as the County Archaeological officer may have separately raised.

Q11.0.6

Langley Priory

Appendix 12A paragraph 4.4 [AS-053] states that the Site does not form any part of the setting of Langley Priory, whilst acknowledging that parts of the Site had an ownership association with the former Priory up to the early twentieth century. HE's guidance, referred to in paragraph 2.30 [AS-053], notes that "historical and cultural associations may also form part of the asset's setting, which can inform or enhance the significance of a heritage asset". In its RR Prologis UK 121 [RR-028D] states that the Heritage Statement confirms the application site comprises part of the setting of the Grade II* listed Langley Priory and attached railings. Do HE and NWLDC agree with the applicants' assessment that the proposed development would not affect the significance of Langley Priory as a designated heritage asset (Grade II*)? If either party disagrees with this assessment, could it please explain why it holds that view and how and to what extent would the significance of the asset be affected.

Whilst there was a historic association between the site and Langley Priory, the site would once have comprised a large

part of the monastic landscape associated with St Mary and St Hardulph Priory Church, Breedon on the Hill (GI listed building and associated hill fort scheduled monument), and Langley Priory (GII* listed building).

Whilst we don't agree with the applicant's conclusion that there is no setting impact, we acknowledge the wider landscape has changed over time. The proposal site makes a very limited contribution to the significance of Langley Priory. In this respect while the proposed development would cause harm to the significance Langley Priory derives from its setting, this would be a negligible level of less than substantial harm.

Thank you again for consulting Historic England. We are in current discourse with the applicant regarding the development of a Statement of Common Ground, currently working through some concerns regarding structure and content.

Yours Faithfully,


Inspector of Ancient Monuments