

Date: 14<sup>th</sup> May 2024  
**Alan Presslee**  
**Cornerstone Planning Ltd.**

Our ref: 1147/02  
**By Email only**

Dear Alan,

**Re: Farm based anaerobic digestion renewable energy facility, construction of vehicular access/road to A1307, associated infrastructure and landscaping CCC/23/110/FUL, response to Conservation Officer Comments**

Please find below GHC Archaeology and Heritage's responses to the comments issued by the Conservation Officer (5<sup>th</sup> December 2023) regarding the above ground heritage implications of the planning application for proposed anaerobic digester facility on land at Streetley Hall Farm (planning ref. CCC/23/110/FUL).

**Background**

A full planning application for the construction and operation of an anaerobic digestion facility has been submitted to Cambridgeshire County Council Council. In support of this application a detailed Heritage Statement (GHC Archaeology & Heritage August 2023) was produced. That report identified that the only designated heritage assets potentially sensitive to development proposals were the Grade II\* listed St Mary's Church, the Grade II\* listed West Wrating Park House and the Grade II listed Streetley Hall Farmhouse. In respect of the II\* listed assets the report concluded no harm due to distance and intervening screening. In regards to Streetley Hall Farmhouse, despite some minor intervisibility, the report concluded:

*Overall, the impact of the proposed development upon the significance of the Grade II listed Streetley Hall Farmhouse is considered to be neutral, i.e. no harm.*

In response to these proposals and the conclusions of the supporting Heritage Statement, commentary on the proposals have been issued from the Conservation officer of South Cambridgeshire District Council, dated 5/12/23. This letter provides Historic Buildings advice on the planning application. The officer is in agreement that the proposed development presents no harm to the significance of either St Mary's Church or West Wrating Park House, they do, however, reach a different conclusion to that presented in the heritage statement regarding the impact to Streetley Hall Farmhouse.

The advice Concludes that:

*it is considered the development would have a harmful impact on the setting and significance of the listed farmhouse. The harm is considered less than substantial and should therefore be balanced by the decision maker against the public benefits of the proposal as required by NPPF para. 202, giving great weight to the conservation of the heritage asset.*

**Response to Officer Comments**

This letter has been produced in response to the comments received above on behalf of the applicant. Please note that the following response is intended to be read in conjunction with the supporting planning documentation, in particular the supporting Heritage Statement (GHC 2023).

The following response will address the key concerns raised and provide a supporting framework in which to consider the comments made by the SCDC Conservation Officer and present our response to those concerns.

## Review and Assessment

The following section provides a review of the conclusions of the Heritage Statement in relation to the comments received from the officer.

The officer states that:

*The arrangement of buildings and open character of the landscape mean the farm is experienced within its landscape towards the development site from both public and private viewpoints. This rural and agricultural setting, including the site of the proposed development, is considered a key aspect of the listed building's significance.*

The first part of this statement is somewhat misleading in that there is no visibility of the application site from Streetley Hall Farmhouse (i.e. towards the development site). The topography of the intervening ground is such that the only part of the study site visible from the vicinity of the farmhouse is the extreme northern corner of the application site (and that only from beyond western side of the farmhouse not the farmhouse itself). There is no visibility of the application site from the north, south or east of the farmhouse (i.e. views that could encompass the asset along with the application site). The only publicly accessible locations that encompass both the application site and the farmhouse are from Dean Road and Webb's Road (so not towards the development site but across it) and such views are at a distance where, whilst Streetley Hall Farmhouse is visible sited above the modern large format farm buildings, it is not possible to fully appreciate its significance or its relationship with the other historic structures within the farmyard. Such views, therefore, cannot be considered a 'key aspect' of the buildings significance.

The officer goes on to state that:

*The LVIA and HE assessment confirm that there would be intervisibility between the listed farmhouse, its curtilage, and the proposed development. However, the HE assessment underplays the significance the site to the listed building as the land became part of the farm after its initial construction.*

The officer is misquoting the heritage statement in this regard. The heritage statement makes clear that the primary reason for the application site being a neutral element within the setting of the listed building is the lack of meaningful visual connectivity between the farmhouse and the application site. The lack of historic association is highlighted, in accordance with Historic England setting guidance, to demonstrate the lack of historic functional associations that could increase the contribution of the application site to the significance of the listed building.

*While it is agreed that the general nature of the proposals relate to the character and continuous development of the farming complex, their extent and scale exceeds any existing modern structure on site. At 16.1m and 12m, the digester and largest barn would be substantial structures in the immediate context of the historic farmhouse and outbuildings, introducing dominant and competing forms in the landscape. Together with the proposed access track, the structures would be visible from the listed farmhouse and its context, changing the way the asset is appreciated within its immediate and wider setting.*

It is welcome that the officer agrees that the general nature of the proposals are fitting with the character and evolution of the farmstead. It is, however, also an aspect of the evolution of farmsteads that the extent and scale of new structures tends to surpass that of previous generations (as can be seen within the farmyard with the late 19<sup>th</sup> century structures in comparison to the 18<sup>th</sup>, and the 20<sup>th</sup> century structures in comparison to the 19<sup>th</sup>). The officers referral to 'context' is a little confusing in this

statement as current guidance is clear that context is not synonymous with setting and it is setting rather than context which is relevant to the assessment of heritage impact. The fact remains that whilst the structures are of a large scale it is not the whole that would be visible from the farmhouse or its immediate environs but rather the upper parts of the tallest structures with the extent of visibility varying depending upon where the viewer is within the vicinity of the farmhouse (with visibility disappearing completely from many locations), given that such visibility would be very changeable it is hard to see how it could be considered to 'dominate'. The reference to the access track being visible from the farmhouse is simply not the case (it is clear that nothing in the vicinity of the access track is currently visible from the farmhouse and this would not change). Again, reference to visibility of the proposed development from the 'context' of the farmhouse is not helpful. Even if the officer had meant the setting, views from the setting are not views from the asset and do not necessarily add to the experience/appreciation of the asset.

*NPPF practice guidance states that 'Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity..' and that 'The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting.'* (Para 013).

The officer includes this quote from the practice guide yet does not describe how they believe that these aspects are of relevance. In terms of noise and odour, the farmhouse is located within a modern working farm, with all of the associated noise and odours (both the submitted noise and odour reports also conclude no significant impact). It is also accepted that public accessibility is not a prerequisite for contribution to significance, however, that does not mean that any location, no matter how remote makes an equal contribution to significance if there are no other factors other than mere visibility in play.

The officer concludes their commentary on the potential impacts to the significance of Streetly Hall Farmhouse by stating:

*In light of the above, it is considered the development would have a harmful impact on the setting and significance of the listed farmhouse. The harm is considered less than substantial and should therefore be balanced by the decision maker against the public benefits of the proposal as required by NPPF para. 202, giving great weight to the conservation of the heritage asset.*

The officer has stated that the proposed development would lead to a level of less than substantial harm to the Grade II listed farmhouse. As detailed in the heritage statement and expanded on above, I do not agree that the proposed development will lead to any harm and will, in fact, remain a neutral element in the setting of the building, however, the officer has also strayed from national guidance in not articulating where upon the scale of less than substantial harm they believe the harm to lie. The NPPF planning practice guidance is clear that:

*Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 194 to 196 [revised to 206 to 208] ) apply.*

*Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.*

Therefore, whilst the officer has identified a level of less than substantial harm they have not articulated where upon that scale they believe the harm to lie. It has been established by the courts that substantial harm is a high test, an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced (Bedford Borough Council v Secretary of State for Communities and Local Government and Nuon UK Limited [2013] EWHC 4344 (Admin)). It stands to reason, therefore, that less than substantial harm covers a very broad spectrum indeed. To be towards the upper end of that spectrum would require something approaching substantial harm and to be at the bottom end of the scale could be something barely noticeable but which still remains detrimental. Given that policy requires any harm to the significance of a heritage asset to be balanced against public benefits (with great weight given to a designated heritage assets conservation) in order for such a balanced judgement to be reached the extent of less than substantial harm needs to explicitly articulated to be accurately balanced against public benefits.

## Conclusions

Development on land that has not previously been subject to development will change its existing baseline conditions. In the case of the application site it is agreed that this will result in a shift from arable field to a renewable energy facility and consequently the nature and perception of this specific field within its wider agrarian landscape. Change, however, does not automatically equate to harm. The listed farmhouse, its immediate setting and the landscape in which it sits have, however, seen substantial changes during the course of their evolution. Development on the proposed site will not alter the ability to understand how the farmstead has evolved or more specifically the significance of the listed farmhouse at the heart of the farmstead.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Paul Gajos', is written over a light blue horizontal line.

Paul Gajos BA(Hons) MA MCIFA  
Director – GHC Archaeology & Heritage