

Melanie Perkins

From: Jamie Wignall
Sent: 25 March 2025 13:43
To: Kirsty Harte
Cc: Planning
Subject: 24/00384/FUL - Land Adjacent to A614, Worksop
Attachments: Visibility Assessment of Proposed Development - 24-00384-FUL.docx

Follow Up Flag: Follow up
Flag Status: Completed

Hi Kirsty/Planning,

Please see the below response to the amended plans for 24/00384/FUL

Thanks, Jamie

24/00384/FUL - Land Adjacent to A614, Worksop [Amended]

I refer to the above...

Site Assessment

The proposal site relates to an area of land which lies adjacent to the eastern aspect of the A614 on the outskirts of the Worksop. The proposal site is situated within the immediate setting of both the grade I listed 'Clumber Park' Registered Park and Garden (List Entry Number: 1001079; Designated: 1st January 1986), and the grade I listed 'Thoresby Park' Registered Park and Garden (List Entry Number: 1000361; Designated: 1st January 1986). The site is also located within the immediate setting of several other designated heritage assets, including that of: the grade II* listed 'Gate Piers and Flanking Walls to Normanton Gate' (List Entry Number: 1156026; Designated: 19th September 1977); the grade II* listed 'Drayton Gate' (List Entry Number: 1045058; Designated: 13th February 1967); and the grade II listed 'West Bridge' (List Entry Number: 1370411; Designated: 31st March 1985), which is itself also designated as a Scheduled Ancient Monument (List Entry Number: 1006400).

The site itself is comprised of a range of open agricultural fields that are located along the eastern aspect of the A614 road. The boundaries of the site are primarily comprised of mature trees and hedgerows, as one would expect of an area of open rural countryside. The proposal site runs parallel to the main thoroughfare of the A614, which encompasses the sites western boundary and functions as a major thoroughfare allowing access to Clumber park. The southern boundary of the site runs parallel with West Drayton Avenue, which is itself a public footpath. The northern boundary of the site runs roughly parallel with the southern banks of the River Poulter, beyond which lies another publicly accessible footpath. The western boundary of the proposal site abuts a swath of mature woodland. The proposal site forms a large part of the open rural countryside setting of the aforementioned heritage assets, and its contribution to the setting of these heritage assets is considered to be positive, on the basis that it helps to reinforces this rural countryside setting.

Overview of Proposal

The current scheme relates to the proposed construction and operation of a 54.5 GW-h solar farm and Battery Energy Storage System covering an approximate area of 73.22 Hectares on land adjacent to the A614. The proposed development would also include all associated works, infrastructure and landscaping. The following comments relate to the submission of a Planning Statement, Heritage Addendum and Landscape Visual Assessment that were submitted on the 24th February 2025. The following comments will also address the submission of a separate Landscape Visual Appraisal that was commissioned by Bassetlaw District Council and submitted on the 14th March 2025.

Assessment of Proposal

Key Considerations

The key consideration is the scheme's impact upon the setting of the surrounding/nearby designated heritage assets, including that of: the grade I listed 'Clumber Park' Registered Park and Garden (List Entry Number: 1001079; Designated: 1st January 1986), the grade I listed 'Thoresby Park' Registered Park and Garden (List Entry Number: 1000361; Designated: 1st January 1986); the grade II* listed 'Gate Piers and Flanking Walls to Normanton Gate' (List Entry Number: 1156026; Designated: 19th September 1977); the grade II* listed 'Drayton Gate' (List Entry Number: 1045058; Designated: 13th February 1967); and the grade II listed 'West Bridge' (List Entry Number: 1370411; Designated: 31st March 1985), which is itself also designated as a Scheduled Ancient Monument (List Entry Number: 1006400).

Definition of Setting and Overview of Policy/Guidance

The National Planning Policy Framework (December 2024) defines setting as *“the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral”*.

The Government's National Planning Practice Guidance goes on to define the relationship between heritage assets and their setting as follows: *All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent. The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. 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 by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. 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. The contribution may vary over time. When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change”*.

The Historic England publication: 'GPA 3 – The Setting of Heritage Assets', extrapolates upon the broad definitions provided by central Government's planning policy. The published document provides guidance in relation to this topic, specifically: in understanding the concept of setting; how setting may contribute to the significance of heritage assets and allow that significance to be appreciated; and how to effectively manage change within the setting of heritage assets. The published document gives a comprehensive overview of the concept of setting, albeit not all aspects of the publication are relevant to the application that is currently being considered. However, Conservation have highlighted a number of key/relevant concepts from this published guidance note:

- The advice note acknowledges the primacy of the NPPF and PPG, supporting the implementation of national policy, and does not constitute a statement of Government policy in of itself;
- The purpose of the advice note is to give assistance on the matter concerning the assessment of the setting of heritage assets, in light of the fact that:
 - o Decision Makers [Local Planning Authorities - LPA] have a statutory obligation to have special regard for the desirability of preserving designed heritage assets and their settings;
 - o When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the heritage asset's conservation, including sustaining significance;
- The publication emphasises that the extent of the setting of a heritage asset 'is not fixed and may change as the asset and its surroundings evolve;
- Settings of heritage assets which closely resemble the setting at the time the asset was constructed or formed are likely to contribute particularly strongly to significance, but settings which have changed may also themselves enhance significance;

- Settings may also have suffered negative impact from inappropriate past developments and may be enhanced by the removal of the inappropriate development;
- In these circumstances, consideration still needs to be given as to whether additional change will further detract from the significance of the asset;
- While many day-to-day cases will be concerned with development in the vicinity of an asset, development further afield may also affect significance, particularly where it is largescale, prominent or intrusive. The setting of a historic park or garden, for instance, may include land beyond its boundary which adds to its significance but which need not be confined to land visible from the site, nor necessarily the same as the site's visual boundary;
- Where [the way in which we experience the asset] is capable of being affected by a proposed development (in any way) then the proposed development can be said to affect the setting of that asset;

Previous Response and Current Stance

Conservation have previously raised strong concerns regarding the current proposal. The land which abuts the eastern aspect of the A614 contributes to the open rural countryside setting of the heritage assets that are outlined in the previous sections. The current proposal would result in the erosion of a large swathe of this rural countryside setting, seeing the existing open agricultural fields replaced with an otherwise largescale solar farm complex, which would in of itself have an overtly industrialised and alien appearance. The proposed development would result, not only in the partial/substantial erosion of the rural countryside setting(s) of the aforementioned heritage assets, but would also result in the construction and operation of an overly large and visually intrusive development within the immediate setting of a number of high grade designated heritage assets. The resulting impact of this development would actively harm the setting of the aforementioned heritage assets. Conservation would equate the harm arising from the impact of this scheme as being 'less than substantial' for the purposes of the NPPF (Dec 2024). Conservation have previously acknowledged that there are clear public benefits associated with the provision of the scheme, specifically in the form of the production of a substantial amount of clean renewable energy. However, in Conservation's view, the provision of this public benefit would not outweigh the level of harm that will be imposed upon the aforementioned heritage assets, which are themselves, some of the most significant within the district.

Heritage Addendum – Response

The following section will address the points outlined within the Heritage Addendum that was submitted 24th February 2025.

“[Conservation’s] response fails to identify what contribution the site makes to either the signifnace of the heritage assets or the ability to appreciate that signifnace”

- The proposal site forms part of the open rural countryside setting of the aforementioned heritage assets;
- Conservation acknowledges that the sites contribution to the signifnace of the surrounding/nearby designated heritage assets, is somewhat limited, in so far that the site: has no historic association with the adjacent heritage assets; and the site is comprised of relatively modern agricultural fields;
- However, the absence of both a historic nature and/or association, do not invalidate the proposal site as being a positive contributor to the setting of the surrounding/nearby heritage assets;
- Historic England's 'GPA 3 – The Setting of Heritage Assets' outlines a non-exhaustive set of potential attributes of a 'setting' that one may wish to consider in order to define said 'settings' contribution to the asset's heritage values and significance;
- These attributes of setting include the following, which Conservation deem to be relevant to this particular development:
 - o The surrounding topography of the heritage asset(s);
 - o The definition, scale and 'grain' of surrounding streetscape, landscape, spaces, etc... of the heritage asset(s);
 - o The green space, trees and vegetation, openness, enclosure and boundaries of the heritage asset's surroundings;

- The way in which the heritage asset is experienced through/in relation to the surrounding landscape;
- The visual dominance or prominence of heritage asset as a focal point within the surrounding setting;
- The established land use of heritage assets surroundings;

“The Interrelationship of the Dukeries [as an aspect of their setting] is the feature of which makes the greatest appreciation of the heritage signfnace of both Clumber and Thoresby”

- Conservation acknowledges the importance/signfnace of the interspatial and contextual relationship that is shared between the Dukeries;
- However, this shared interrelationship does solely account for the setting of the ducal estates;
- Historic England’s ‘GPA 3 – *The Setting of Heritage Assets*’ address this specific scenario, when it goes on to state that “**Extensive heritage assets, such as historic parks and gardens, landscapes and townscapes, can include many heritage assets, historic associations between them and their nested and overlapping settings, as well as having a setting of their own**”;
- Conservation would argue, that as well as sharing an interspatial and contextual relationship as a feature of setting, the respective ducal estates also possess individual/unique aspects of setting, and in the case of both Clumber and Thoresby, their setting is also defined by the open rural countryside surroundings in which they are framed/viewed within;

“The result of [existing planting of mature woodland] is that there are no significant views across the wider landscape to the east”

- While the concept of ‘setting’ is most commonly discussed in terms of views, the concept is not just limited to the intervisibility between two given points (i.e. the intervisibility between a heritage asset and an area of development);
- That being said, the Landscape Visual Assessment that was commissioned by Bassetlaw District Council and published on the 14th March 2025, clearly shows some degree of intervisibility between public thoroughfares within Clumber Park and the proposed development area;

“It is important to note that the current character of the site is one of modern agrictural fields”

- Conservation acknowledges the relatively modern nature of the agricultural fields that are located within the development area;
- However, as has previously been stated, the modern character of the proposal site does not necessarily invalidate the site as being a positive contributor to the setting of the surrounding/nearby heritage assets;
- The proposal site is still overtly agrarian in nature, and continues to contribute to the rural countryside setting of the surrounding/nearby heritage assets;
- Furthermore, the proposal site in its current form would contribute far more to the setting of the surrounding/nearby heritage assets, than it would if it were to be filled with an industrial scale solar array, as is proposed in the current scheme;

“The site is afforded limited seasonal visibility”

- In response to this point, Conservation has compiled a brief visibility assessment of the proposed development area (see attached), which features a number of site photos of the proposal site, taken from along the throughfare of the A614;
- The visibility assessment clearly shows the visibility openness of the proposal site from along this major thoroughfare, which itself functions as one of the main routes which allows access to Clumber park;

Recommendation

Conservation objects to the proposed development as the level of harm incurred to the setting of the surrounding/nearby heritage assets, is considered to be ‘less than substantial’ for the purposes NPPF. The proposal would therefore be contrary to: Section 66(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990; Policies ST40 and 41 of the Bassetlaw Local Plan 2020-2038; and Paragraphs 202, 207, 208, 210, 212, 213, 215 and 219 of the NPPF (December 2024).

Kind Regards,
Jamie Wignall

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