

Summary Proof of Evidence – Heritage.

Land South of Park House Farm, Meriden Road, Fillongley.

Appeal by Enviromena Project Management UK Ltd.

Date: 10/03/2025 | Pegasus Ref: P24-1827

PINS Ref: APP/R3705/W/24/3349391

LPA Ref: PAP/2023/0071

Author: Hannah Armstrong BA(Hons) MSc IHBC ACIfA
Director

1. My name is Hannah Armstrong. I am a Director at Pegasus Group I am a full member of the Institute for Historic Building Conservation (IHBC) and an Associate of the Chartered Institute for Archaeologists (CIfA). I have a BA Honours degree in Archaeology from the University of Bristol and a Master of Science in the Conservation of Historic Buildings from the University of Bath. I have over twelve years' experience working in the heritage sector.
2. The evidence which I have prepared and provided for this Appeal has been prepared and given in accordance with the guidance of my professional institutions. I confirm that the opinions expressed are my true professional opinions, irrespective of by whom I am instructed.
3. The following provide a summary of my position regarding the designated heritage assets which are the subject of this Appeal.

Summary of Key Heritage Issues and Case

4. Based upon the evidence provided by NWBC and the Rule 6 Party, and the understanding gained via the SoCG process, the key heritage issues associated with this Appeal are as follows:
 - What is the heritage significance of the identified designated heritage assets, including any contribution made by their 'setting'.
 - What contribution is made by the Appeal Site to the overall heritage significance of the identified designated heritage assets, if any.
 - What change would occur as a result of the Appeal proposals in terms of how the identified heritage assets are understood, experienced and appreciated, and how any harm would arise to their overall heritage significance of the identified designated heritage assets as a consequence of the change.
 - Do 'features' recorded on the Warwickshire Historic Environment Record ('HER') as referenced within the Keystone Heritage report represent NDHAs in the terms of the NPPF and whether harm would arise to them, be that via physical changes or changes in 'setting'.

Scheduled Ringwork Castle

5. The heritage significance of the Scheduled Ringwork Castle is principally derived from the historic, architectural and archaeological interest of the above and below grounds remains within the bounds of the designated area. The 'setting' of the asset also contributes to the significance of the asset, although the significance derived from the setting is less than that derived from its physical remains.
6. The Appeal Site is considered to form part of the wider surrounds of the Scheduled Ringwork which makes a limited contribution, at most, to the overall heritage significance of the asset. Any contribution is isolated to Field 5
7. The proposed development would not alter the overall understanding and experience of the surviving form of the Scheduled Ringwork, its relationship with the settlement of Fillongley to the north, its relationship with the watercourses which surround it, or its

immediate agricultural hinterland, much of which formed part of the former deer park. It is such elements of the 'setting' of the asset which are considered to make the greatest contribution to its overall significance. The proposals would not alter the flow of the streams which define the Scheduled Monument.

8. When considering any intervisibility or co-visibility it is important to take into account: the degree of perceptibility of the proposed development when taking into account the intervening distance and the nature of the proposals; and the clear separation between the proposed solar farm and the asset.
9. Based upon available evidence, it is anticipated that the proposed solar panels in the northern part of Field 5 would be visible from isolated elements of the Scheduled Monument and co-visible with the boundary of the Scheduled Monument from isolated areas to the east. No further elements of the proposed development are anticipated to be visible or co-visible with the Scheduled Monument.
10. The visual change would be a distant and filtered change, and undeveloped agricultural land (including wider extents of the former deer park which are in pastoral use) would remain in the foreground emphasising the separation between the proposals and the Scheduled area.
11. The proposals would result in a change to the character of a presumed part of the former deer park contemporary to, and most likely associated with, the occupation of the Scheduled Monument. This change, however, needs to be considered in the context of the current character of this part of the presumed former deer park, which is not a relic of the historic form. Furthermore, the proposed solar development would not alter the field boundaries of Field 5 (as now extant), nor would it 'remove' the agricultural landscape as grassland will remain/be established beneath the panels and existing field boundaries will remain, allowing for the agricultural landscape to still be read and understood, and the proposals to be reversible.
12. Based upon the nature of change, and that the significance of the asset is primarily derived from the above and below ground remains within the Scheduled area; and that elements of its setting that make a greater contribution to its significance will not be harmed, it is my opinion that the proposed solar development would result in a change to the 'setting' of the asset which would result in a **low level of less than substantial harm, with this taking a precautionary approach**. Such harm is associated with the change to Field 5 only (with the presumed extent of the former deer park boundary once again reiterated) and would be reversed on the decommissioning of the solar farm.

Fillongley Conservation Area

13. The heritage significance of the Fillongley Conservation Area is principally derived from the special architectural and historic interest of the buildings and spaces within its bounds, and the contribution which they make to the understanding, experience and appreciation of the occupation of the settlement. While there is currently no statutory protection for the 'settings' of Conservation Areas, it is evident that elements of the surrounds of the Conservation Area (its 'setting') make some contribution to its significance, albeit less than the structures and spaces within its boundaries.

14. It is my opinion that any contribution made by the Appeal Site to the Conservation Area, via 'setting', is derived solely from the contribution which it makes to the understanding of the Scheduled Ringwork. Thus, any potential impact that would arise to the overall heritage significance of the Conservation Area, via a change in 'setting' would derive solely from the limited change to the understanding, experience and appreciation of the Scheduled Ringwork, and in turn the contribution which these assets make to the overall heritage significance of the Conservation Area.
15. When taking into account the heritage significance of the designation as a whole, and the nature of the resulting change, the harm arising to the Conservation Area, via a change in 'setting', can only be considered to be at the **low end of less than substantial, with this taking a precautionary approach**. The harm identified would be reversed on the decommissioning of the solar farm.

Grade II Listed Park House

16. The heritage significance Park House is principally derived from the architectural, historic, aesthetic and archaeological interest of its physical fabric. The 'setting' of the asset also contributes to the significance of the asset, although the significance derived from the setting is less than that derived from its physical fabric. It is my position that the Appeal Site forms part of the 'setting' of Park House Farm which makes a limited, at most, contribution to its overall heritage significance.
17. The principal elements of the physical surrounds and experience of the asset (its "setting") which make the greatest contribution to the overall heritage significance, as outlined at §4.51 of my Evidence, would not be subject to change. When considering any intervisibility or co-visibility it is important to take into account: the degree of perceptibility of the proposed development when taking into account the intervening distance and the nature of the proposals; and the clear separation between the proposed solar farm and the farmstead.
18. When considering any intervisibility or co-visibility it is important to take into account: the degree of perceptibility of the proposed development when taking into account the intervening distance and the nature of the proposals; and the clear separation between the proposed solar farm and the asset.
19. Visibility of the proposed development from Park House is anticipated to be limited to glimpsed views from isolated parts of the upper floors of the asset.
20. The proposed development would result in a change to some incidental views of Park House from within the Appeal Site and the wider surrounds. It would also be co-visible with Park House, most commonly experienced via glimpsed views of the farmhouse set amongst the modern expansion of the farmstead, from within the bounds of the Appeal Site, the immediate environs to the east of the Appeal Site and from elevated parts of Meriden Rd and Green End Rd to the north of the farmstead.
21. The proposals would read as a change in the wider surrounds of the farmstead, within an area characterised by post-War agricultural practices and within the context of the M6 motorway. A clear separation between the proposed solar farm and the farmstead would be appreciable.

22. The proposed solar arrays would sit atop of the land, and thus it would still be apparent that the arrays and their associated infrastructure are situated within former wholly agricultural fields. Furthermore, due to the low-lying nature of the proposals, the overall 'openness' of the landscape in this location would remain.
23. Taking the nature of change into account, that the significance of the asset is primarily derived from its physical form and that elements of its setting that make a greater contribution to its significance will not be harmed, it is my opinion that the proposed solar development would result in a change to the 'setting' of the asset which would result in a **low level of less than substantial harm, with this taking a precautionary approach**. The harm identified would be reversed on the decommissioning of the solar farm.

Grade II Listed Ancillary Buildings at Park House Farm

24. The heritage significance of the assets is principally derived from the architectural, historic, aesthetic and archaeological interest of their physical fabric. The 'setting' of the asset also contributes to the significance of the asset, although the significance derived from the setting is less than that derived from its physical fabric. I do not consider that the Appeal Site forms part of the 'setting' of the Listed Ancillary Buildings at Park House Farm which contributes to their overall heritage significance.
25. Should the proposed development be visible from, or co-visible with, the Listed ancillary buildings at Park Farm, it would represent a change in the wider landscape beyond the historic landholdings associated with the farm complex. The ability to view the proposals from, or in-conjunction with the assets would not alter the ability to understand or experience them, be that in regard to their architectural style or function, or their relationship with the principal dwelling.
26. Thus, I **do not consider that harm would arise to these assets**, via a change in 'setting'.

Grade II Listed Fillongley Mount

27. The heritage significance of Fillongley Mount is principally derived from the architectural, historic, aesthetic and archaeological interest of its physical fabric. The 'setting' of the asset also contributes to the significance of the asset, although the significance derived from the setting is less than that derived from its physical fabric. It is my opinion that the Appeal Site makes a limited, at most, contribution to the overall heritage significance of Fillongley Mount.
28. The principal elements of the physical surrounds and experience of the asset (its "setting") which make the greatest contribution to the overall heritage significance, as outlined at §4.78 of my Evidence, would not be subject to change.
29. When considering any intervisibility or co-visibility it is important to take into account: the degree of perceptibility of the proposed development when taking into account the intervening distance and the nature of the proposals; and the clear separation between the proposed solar farm and the asset.
30. The proposed development would result in a change to some incidental views of Fillongley Mount from within the Appeal Site; however such views are not considered to contribute to the understanding, experience or appreciation of the asset.

31. The proposed development would result in a change to the character of one part of the composition of the anticipated wide reaching, southeasterly views from Fillongley Mount, which are understood to have formed part of the design intent of the asset. In considering this change, it is important to take into account that: the Appeal Site fell beyond the designed parkland associated with the asset; the Appeal Site is not a relic of the 19th century in terms of its field morphology and character; and the M6 motorway which defines the southern boundary of the Appeal Site is clear modern change which the Appeal Site is viewed alongside.
32. Taking the nature of change into account, that the significance of the asset is primarily derived from its physical form and that elements of its setting that make a greater contribution to its significance will not be harmed, it is my opinion that the proposed solar development would result in a change to the 'setting' of the asset which would result in a **low level of less than substantial harm, with this taking a precautionary approach**. The harm identified would be reversed on the decommissioning of the solar farm.

Grade II Listed White House Farmhouse

33. The heritage significance of White House Farmhouse is principally derived from the architectural, historic, aesthetic and archaeological interest of its physical fabric. The 'setting' of the asset also contributes to the significance of the asset, although the significance derived from the setting is less than that derived from its physical fabric. It is my position that the Appeal Site does not form part of the 'setting' of White House Farmhouse which positively contributes to the understanding and experience of the asset, and thus its heritage significance.
34. The principal elements of the physical surrounds and experience of the asset (its "setting") which contribute to the overall heritage significance, as outlined at §4.93 of my Evidence, would not be subject to change.
35. Co-visibility from beyond the Site was not readily identified during the site visit, thus co-visibility of proposals and White House Farmhouse anticipated to be limited, if present at all. If co-visibility would occur, the proposed development would not alter the understanding and experience of White House Farmhouse as an early 19th-century farmhouse, its relationship with the associated farmstead or its associated land holdings.
36. It is anticipated that isolated parts of the proposed development would be visible from White House Farmhouse, and it is acknowledged that the proposed development would result in a change to some views of White House Farmhouse from within the Appeal Site. Where visible, the proposals would be viewed as change within the wider landscape, beyond the alignment of Meriden Road and mature tree planting and alongside the M6 motorway. It would not alter the understanding and experience of White House Farmhouse as an early 19th-century farmhouse, its relationship with the associated farmstead or its associated land holdings (modern and historic). It would read as a separate entity within the wider landscape, the overall openness of which would remain. It is also important to take into account that the proposed solar development will not 'remove' the agricultural landscape as grassland will be established beneath the panels and existing field boundaries will remain, allowing for the agricultural landscape to still be read and understood.
37. Thus, **I do not consider that harm would arise to this asset**, via a change in 'setting'.

Grade II* Listed Church of St Mary and All Saints

38. The heritage significance of the Church of St Mary and All Saints is principally derived from the architectural, historic, aesthetic and archaeological interest of its physical fabric. The 'setting' of the asset also contributes to the significance of the asset, although the significance derived from the setting is less than that derived from its physical fabric.
39. The principal elements of the physical surrounds and experience of the asset (its "setting") which contribute to the overall heritage significance, as outlined at §4.104 of my Evidence, would not be subject to change.
40. When considering any intervisibility or co-visibility it is important to take into account: the degree of perceptibility of the proposed development when taking into account the intervening distance and the nature of the proposals; and the clear separation between the proposed solar farm and the asset.
41. Incidental views of the Church have been identified from isolated parts of the Site, with co-visibility between the Church equally limited. In all such cases, views of the Church are limited to glimpsed views of the tower, with the extent of the tower visible varying across the viewpoints. In all such cases the tower is viewed with the wider landscape to the north of the settlement as a backdrop and does not break the skyline. There is little to no understanding or experience of the architectural detailing of the Church or its siting within the settlement of Fillongley, and within such views the tower is not viewed as a 'waymaker' in the landscape. It is thus concluded that these incidental views of the tower of the Church of St Mary make a very limited, at most, to the overall heritage significance of the asset.
42. Whilst the proposed development would result in a change to the overall composition of a very small number of potential incidental views of the Church of St Mary and All Saints from isolated parts of the Appeal Site and the wider landscape to the east and west, such views currently make very limited, at most, contribution to the heritage significance of the asset. The change to the wider composition of those limited wider views is not considered to detract from the heritage significance of the asset.
43. Taking the nature of change into account, and that the significance of the asset is primarily derived from its physical form; that the elements of its setting which contribute to its significance will not be harmed; and that the Appeal Site is only part of wider incidental views to the asset from far beyond its associated settlement, **I do not consider that harm would arise to this asset**, via a change in 'setting'.
44. NWBC have confirmed via the Heritage Statement of Common Ground between the LPA and Appellant that references to the Church of St Mary and All Saints within the reason for refusal was made in regard to a discussion on Local and Neighbourhood Plan policies referenced within the reason for refusal only, and that NWBC did not seek to identify any harm to the heritage significance of the Church (or any other heritage asset) within the reason for refusal.

‘Non-Designated Heritage Assets’

45. I do not consider that the ‘NDHAs’ identified by Keystone Heritage as located within the Appeal Site should be considered as such, nor do I consider that the Appeal Site should be classified as non-designated historic landscape associated with either the medieval or post-medieval period.
46. The assessment provided within the Keystone Heritage Report appears to rely on the identification of the elements within HER data, without considering the source of identification or the current context. Furthermore, the assessment presented does not accurately reflect the current character or composition of the Appeal Site, nor the manner in which it is experienced.
47. Even if the Decision-Maker was to conclude differently and consider that some ‘features’ identified on the HER or by Keystone Heritage within the surrounds of the Appeal Site should be designated to be classified as NDHAs, I do not consider that these would be sensitive to change within the Appeal Site as a result of a change in ‘setting’.

Archaeology

48. It is common ground between the Appellant, NWBC and the Rule 6 Party that:
- Matters of below-ground archaeology did not form a reason for refusal.
 - The LPA County Archaeologist did not object to the Scheme.
 - Archaeology can be suitably and proportionately addressed via the Appellant’s commitment to undertaking a programme of archaeological investigations, based upon which an Archaeological Mitigation Strategy will be prepared and implemented.

Bristol

First Floor, South Wing, Equinox North,
Great Park Road, Almondsbury, Bristol, BS32 4QL
T 01454 625945
E Bristol@pegasusgroup.co.uk
Offices throughout the UK.

Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales.

Registered office: 33 Sheep Street, Cirencester, GL7 1RQ
We are ISO certified 9001, 14001, 45001



[Pegasus_Group](#)



[pegasusgroup](#)



[Pegasus_Group](#)

PEGASUSGROUP.CO.UK