

On 30th September 2025, the Appellant provided Historic England with links to the documentation available at the planning inquiry earlier in the year. Historic England has since responded to the Inspector's consultation and the Appellant finds the following extracts especially compelling:

- *"We understand that the application information refers to other heritage assets, and we will leave these to the local authority to address."*
- *"Should we have been consulted on the original application we would have provided the advice set out below"*
- *"there would be **no direct impact on the scheduled monument or church**"*
- *"The proposal is **not considered to harm the significance of the heritage assets**"*
- *"We draw your attention to the statutory duties of the decision maker set out in section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and the requirements of sections 12 and 16 of the National Planning Policy Framework (NPPF)."*
- *"The proposed development is **not considered to harm the significance of the Church or scheduled monument.**"*
- *"Historic England has **no objection to the application on heritage grounds.**"*

The Appellant revisited the comments made by the parties from the planning application stage, through the statements of case, statements of common ground, proofs of evidence and closings, and are reminded that in respect of the Scheduled Monument and the Church:

- The opinions of the Appellant and the Local Planning Authority on harm to the assets have remained consistent and precautionary; towards the lower end of less than substantial harm, if any harm at all. See Appellant Heritage PoE Plates 5 and 6.
- The opinions of the Rule 6 Party on harm to those assets remained stubbornly high.

In closings the Appellant said the following:

- On the Monument: *"The Council and the Appellant are **aligned on the impacts**. Per the heritage SOCG, (CD12.9) both find **low level** less than substantial harm ("LTSH") to four assets: the Scheduled Ancient Monument ("SM"); the Conservation Area ("CA"); Park House Farm; and Fillongley Mount. The Council also finds low level LTSH to White House Farmhouse. Both agree there are no impacts to non-designated heritage assets ("NDHAs"). **Ms. Tuck is an outlier.** She considers the harm to the SM and CA would be at the upper end of LTSH – approaching substantial harm, akin to near total destruction."*
- On the Church: *"Ms. Armstrong agrees with the Council that **no harm would arise**. GPA3 is clear that simply seeing a church tower in the wider landscape – as is often possible – may not impact on significance, particularly where such views do not allow significance to be appreciated and where there are no designed/associative views. 199 There is no evidence of any designed/associative views here. Ms. Tuck agreed a wider view of a church tower need not automatically contribute to significance. Ms. Tuck also accepted that, even with the solar in place, the Church would still be understood as set in a rural context, given the c.1km of undeveloped land that would remain to the south. 201 101. Ms. Armstrong's conclusion is to be preferred: while there would be a change in the very much wider agricultural surroundings, that is **not going to impact the significance of the Church itself**. Ms. Tuck accepted any impact would be **"negligible"***

In light of the response by Historic England, the Appellant remains of the view that the Rule 6 party's position throughout has remained that of an outlier, whereas the Appellant's and Local Planning Authority's positions are shown to have been consistent and reliable.

Heritage was not a reason for refusal, and for the reasons given by the Appellant in Closings we respectfully request it remains as such; §152 *"As to heritage, it is **now common ground between all three main parties** that public benefits outweigh the harm, such that the §215 balance is passed and the "clear and convincing" justification is found". And §156 *"For all these reasons and those outlined at the Inquiry, the Inspector is invited to agree with the final balance drawn by the Council's Head of Development Control and to grant permission, subject to appropriate conditions".**