

THE RURAL PLANNING PRACTICE



Supporting Statement

In Support of an Application for a Ground Mounted Domestic Solar Array
at Park Farm, Twineham Lane, Twineham RH17 5NP

ADDRESS Park Farm House, Twineham Lane, Twineham RH17 5NP

ON BEHALF OF Mr and Mrs W Bunn

PREPARED BY The Rural Planning Practice

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Appendix I - Excerpts from report by Chris Butler Archaeology prepared for
work previously undertaken at Park Farmhouse

Appendix II - Precautionary Method Statement : Great Crested Newts

(Appendices supplied separately)



1. The Proposal

- 1.1. Park Farm House is located in a rural location on the outskirts of Twineham. It sits within what was a farmyard group with Park House and Park Farm Barns; both of these houses have discretely sited solar arrays. The site is not located in an area of landscape designation.
- 1.2. While this is a Full Planning Application, taking the lead from another similar application for solar panels in the district at Portways House RH17 5SN where (as in this case), there was no adverse impact on any established vegetation, the application was deemed to serve a domestic use and met the requirements of a Householder Application and was therefore not required to submit a Biodiversity Net Gain calculation. It is hoped the authority will follow this sensible approach for this application.
- 1.3. The proposed development is for a 26kW ground mounted solar array to serve Park Farmhouse. The installation is for two banks of 30 panels in two rows, the panels are 1762 mm long, 1134 wide and 30mm deep.
- 1.4. This application has taken into account the Historic England advice issued in March 2024 *Ground Mounted PV Arrays*.
- 1.5. The location has been chosen with some care to avoid affecting the setting of Park Farmhouse which is a Grade II listed building, or the amenity two neighbouring houses. The panels are not in the view of any public rights of way and not seen from the road. The proposed location is set against a hedge in a dip which further helps to reduce the visual impact. The panels are high enough to allow the land to continue to be grazed.
- 1.6. Battery storage is in the garage. Access for maintenance is achievable across the field which belongs to the applicant and the installation will not be prone to vandalism for this reason.
- 1.7. The area is in Flood Zone 1.
- 1.8. The site is within a field of improved grassland away from trees and scrub. It is recognised the area is designated a 'red area' for Great Crested Newts and a Precautionary Method Statement is submitted as Appendix II as part of the application.
- 1.9. The main issue is whether the proposal has an adverse impact on the landscape or the setting of the listed building and whether any damage is likely to result in loss of archaeology or loss of significance of the house. A report prepared by Chris Butler Archaeology prepared for work previously undertaken at Park Farmhouse considers the HER within one kilometre including the fields and states at 4.03 '*According to the HER there have been no archaeological interventions (watching briefs, evaluations, or other investigations) in the immediate vicinity of the site*'; in view of the lack of archaeological interest identified in the report this is unsurprising. The relevant sections of the report are supplied as Appendix 1. The sections relating to the fabric of the house are deliberately not submitted because they are not relevant in this context. The land is unlikely to be of archaeological interest.



Aerial Image of Site & Surroundings



Park Farm House
(GII Listed)

Inverter and batteries
located in garage

Proposed solar panels

Park Farm

Park House

Solar panels
serving Park House

Twineham Lane



2. Heritage Assessment

- 2.1. Park Farmhouse is a Grade II Listed Building. The house was first listed in May 1983; the list description is as follows:

'Timber-framed home of circa 1600, now fronted with red brick on ground floor and tile-hung above. Casement windows. Doorways with lead ogee-shaped canopy over. Two storeys. Four windows. West wing C19 addition. Listing NGR: TQ2574419724'

3. Legislative Framework

- 3.1. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the legal requirements for the control of development and alterations which affect listed buildings or conservation areas (including buildings of heritage interest which lie within a conservation area). Grade I are buildings of exceptional interest. Grade II are particularly significant buildings that are of more than special interest.
- 3.2. The National Planning Policy Framework (2024) deals with '*Conserving and Enhancing the Historic Environment*' and it recognises that heritage assets are an irreplaceable resource which 'should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations' (para 207). Significance derives not only from a heritage asset's physical presence, but also from its setting.
- 3.3. The proposal does not result in the '*total loss of significance*' or '*substantial harm*' to any built heritage asset. The panels are about 100 metres from the house.
- 3.4. Setting is defined in the NPPF 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*' (NPPF, Annex 2: Glossary).
- 3.5. Setting is the way in which the asset is understood (i.e., evidential, and historical interests) and experienced (aesthetic and communal values). It is not an asset in itself. It differs from curtilage and may cover a wider area, context (association with other assets irrespective of distance) and historic character (sum of all historic attributes, including setting, associations, and visual aspects) and are all part of the whole.
- 3.6. Guidance produced by Historic England (The Setting of Heritage Assets. Historic Environment Good Practice Advice (GPA) in Planning Note 3, 2017) as well as the Landscape Institute and Institute of Environmental Management and Assessment Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3), 2013) has been used to adopt a stepped approach for settings' assessment. The former sets out five steps, of which the first four are relevant in this case:

Step 1: Asset identification. The NPPF requires an approach that is proportional to the significance of the asset, and for this reason only the settings of the most sensitive (i.e., designated) heritage assets are considered in this assessment. A scoping exercise filters out those assets which would be unaffected, typically where there are no views to/from the site.



Step 2: Assess the contribution of setting. This stage assesses how setting contributes to the overall significance of a designated asset.

Step 3: Assess change. This considers the effect of the proposals on asset significance.

Step 4: Mitigation. This explores the way to maximise enhancement and avoid or minimise harm. This is typically considered at the design stage.

Step 1:

- 3.7. The asset, Park Farm has been identified. There are no other listed buildings or conservation areas within the setting. Most of the historic interest is contained within the Park Farmhouse building itself. No change is proposed to the house or its outbuildings.
- 3.8. There is no intervisibility between the house and the site where the panels are to be located; the panels are set into a dip. The views from the west of the house would be oblique views from upstairs bedroom windows; the view would be further obscured by the intervening hedgerows.
- 3.9. The views from the other two houses in the group would not be affected either.

Step 2, Step 3 and Step 4:

- 3.10. Setting is the surroundings in which an asset is experienced: all heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. 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. Although views of or from an asset will play an important part to its setting, other environmental factors such as noise, dust, vibration, as well as spatial associations, and the understanding of the historic relationship between places contribute to setting.
- 3.11. This proposal for the solar panels does not impact on the setting of the listed building or on the two other houses in the group and neither does it give rise to other adverse environmental factors.
- 3.12. The impact of the domestic solar array is negligible. There is no need for mitigation. The public benefit derived from the panels is the generation of affordable renewable energy to supply Park Farm which has very little insulation resulting from its historic construction, the building has an EPC of band G. The sustainability of the building is significantly enhanced as the result of the installation of the solar panels.

4. Planning Policy

- 4.1. The Government's push to achieve de-carbonisation by 2030 is familiar to most people; whether it is achievable or not, it is an admirable goal.

National Planning policy Framework 2024 (NPPF)

- 4.2. Planning policy is supportive of the use of renewable energy and at paragraph 165 of the National Planning Policy framework, authorities are required to develop 'a positive strategy' for renewable and low carbon energy. The cumulative landscape and visual impacts need to be taken into account but in this case the visual impact is very small. There is no impact on the other two houses in the group either.



- 4.3. Paragraph 167 of the NPPF supports changes to buildings to accommodate energy efficiency with the need to consider policies relating to listed buildings and conservation areas set out at Chapter 16 of the NPPF. This has already been addressed in this document.

Mid Sussex adopted Local Plan (2014-2031) Policies DP12 Protection of the Countryside, Policy DP34 Listed Buildings, DP 38 Biodiversity, Policy DP40, Renewable Energy Schemes.

- 4.4. The DP40 policy states:

Proposals for new renewable and low carbon energy projects (other than wind energy development– see below), including community-led schemes, will be permitted provided that any adverse local impacts can be made acceptable, with particular regard to:

- Landscape and visual impacts, including cumulative impacts, such as on the setting of the South Downs National Park and High Weald Area of Outstanding Natural Beauty, and the appearance of existing buildings;
- Ecology and biodiversity, including protected species, and designated and non-designated wildlife sites;
- Residential amenity including visual intrusion, air, dust, noise, odour, traffic generation, recreation and access.

- 4.5. In the case of this application there is no impact on areas of landscape designation, protected species, residential amenity or the loss of significance of the listed house.

- 4.6. The authority will be aware that solar energy capture with battery storage is one of the most effective ways of retrofitting old houses with renewable energy; the use of air source or ground source heat pumps is far more complex and possibly far more damaging to the fabric. The proposal meets Local Plan policies DP12 Protection of the Countryside, Policy DP34 Listed Buildings, DP 38 Biodiversity, and Policy DP40, Renewable Energy Schemes.

5. Conclusion

- 5.1. The authority is respectfully asked to grant permission for the solar panels which meets national and local planning policy thus enabling a listed building to be heated using renewable energy without damaging the significance of the house, detracting from the countryside or protected species.