

Jessica Szollosi, Planning Officer

Planning Department
Mid Sussex District Council,
Oaklands Road
Haywards Heath,
West Sussex,
RH16 1SS

date: 18/6/26

our ref:- PICKERIDGE FARM_PV/18.6.26/contract/HAPA

Dear Jessica,

RE: PV panels on an outbuilding at Pickeridge Cob Lane, Ardingly, RH17 6ST - DM/26/1033

We appreciate the comments of the Conservation Officer and agrees that the significance of the Grade II listed farmhouse and the wider historic farmstead is an important material consideration. However, it is respectfully considered that the conclusions reached overstate the heritage impact of the proposal and do not fully reflect the evidence contained within the submitted Planning Statement and Heritage Impact Assessment.

Visibility does not equate to heritage harm

The Conservation Officer's assessment is founded largely on the visibility of the solar panels from the Public Right of Way and surrounding land. However, neither the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF nor Historic England's GPA3: The Setting of Heritage Assets establishes visibility alone as constituting harm.

Historic England is clear that setting contributes to significance only where it influences the way a heritage asset is experienced and understood. The relevant test is therefore not whether the panels can be seen, but whether their presence harms the significance of the listed farmhouse through its setting.

Whilst the Conservation Officer describes the panels as visually prominent, the response does not explain how the installation diminishes the architectural, historic or evidential significance of the 16th-century farmhouse. The focus is placed on the appearance of the panels themselves rather than their effect on the significance of the designated heritage asset, which is the test required by paragraph 215 of the NPPF.

The proposal affects a modern building that does not contribute to significance

The Heritage Impact Assessment demonstrates that the solar panels are installed on a workshop constructed in 1982, which is a modern utilitarian building that makes no positive contribution to the significance of the listed farmhouse or the historic farmstead.

No historic fabric has been altered and no works have been undertaken to the listed building itself. The proposal therefore avoids direct harm to the designated heritage asset and provides electricity to lower the operational costs of the already energy hungry listed building.

The farmstead has evolved considerably throughout the twentieth century and now comprises a mixture of historic and modern buildings. The workshop is one of these modern additions, and the installation of solar panels on its south-facing roof does not alter the historic relationship between the farmhouse, the surviving traditional farm buildings or the surrounding rural landscape.

Visual impact has been minimised

The Planning Statement and Heritage Impact Assessment explain that the array has been installed as a single low-profile installation using high-efficiency panels, enabling the smallest practical array to achieve the highest energy output.

The panels face away from the listed farmhouse and are mounted on an existing modern roof. Whilst they are visible from certain viewpoints, particularly in longer-distance views, visibility alone is not evidence of heritage harm.

The Conservation Officer also refers to the colour and reflectivity of the panels. No evidence has been presented that glare or reflection materially is present or affects the appreciation of the listed building.

Alternative locations

The suggestion that a ground-mounted array could have been located elsewhere within the landholding is speculative and unsupported by evidence and is not what the application is here to cover. The proposal makes efficient use of an existing modern roof and requires no additional land take.

Furthermore, the NPPF does not require applicants to demonstrate that every conceivable alternative has been discounted before renewable energy development can be supported.

Public benefits

The public benefits arising from the proposal are substantial and have been drastically understated within the Conservation Officer's response.

The Planning Statement demonstrates that the system is already generating significant renewable electricity, supplying the farmhouse, charging battery storage and exporting surplus electricity to the National Grid.

The proposal therefore delivers genuine and measurable benefits by:

- reducing carbon emissions;
- improving energy resilience;
- reducing reliance on fossil fuels;
- supporting the continued sustainable occupation of the listed farmhouse;
- contributing towards national renewable energy and Net Zero objectives.

Paragraphs 167 and 168 of the NPPF require significant weight to be given to renewable energy proposals and energy efficiency improvements. These benefits are therefore material considerations that attract considerable weight.

It is also important that the wider planning context is recognised. In 2026, national planning policy places significant weight on the delivery of renewable energy and the transition to a low-carbon economy. Listed buildings present particular challenges in this regard. They are often inherently energy intensive due to restrictions on insulation, airtightness improvements and other energy efficiency measures necessary to preserve their historic fabric. At the same time, owners of listed buildings face significantly higher maintenance and repair costs, with

many conservation works attracting VAT, placing an additional financial burden on those responsible for safeguarding the nation's built heritage. Enabling sensitively designed renewable energy installations on modern, non-contributing buildings within the curtilage of listed properties provides a practical means of improving their long-term sustainability without compromising their significance. Refusing such proposals risks discouraging investment in the continued occupation and conservation of historic buildings, contrary to the objectives of both the NPPF and the Government's commitment to achieving net zero.

Planning balance

The Heritage Impact Assessment concludes that the proposal causes no harm to the significance of the listed building because it affects only a modern structure that makes no contribution to that significance.

However, even if the Local Planning Authority concludes that a very low level of less than substantial harm arises, paragraph 215 of the NPPF requires that harm to be balanced against the public benefits.

Given the absence of any impact on historic fabric, the use of a modern non-contributing building, and the significant renewable energy benefits already being delivered, it is considered that the proposal satisfies both the requirements of the NPPF and Policy DP34. Accordingly, the application should be approved.

Yours sincerely,



Stuart Paine RIBA (Director)

On behalf of:

HAPA Architects Ltd, RIBA Chartered Practice