

Rebuttal – Heritage.

Fields OS 6700, 6722 & 5200, Muston Lane, Easthorpe.

Appeal by JBM Solar Projects 10 Ltd.

Date: 03/09/2024 | Pegasus Ref: P19-2022

PINS Ref: APP/Y24430/W/24/3340258

LPA Ref: 22/00537/FUL

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Director





1. Introduction

- 1.1. My name is Hannah Armstrong. My qualifications and experience are set out in my Proof of Evidence.
- 1.2. 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.
- 1.3. To confirm, and as set out in §1.5 of my Proof of Evidence, I was not the author of the Cultural Heritage and Archaeology ES Chapter or Heritage Statement which accompanied the application (*Core Documents 1.31.3 and 1.33.7*). The evidence which I have provided within my Proof of Evidence and supporting appendices supersedes the assessments presented within the ES Chapter and Heritage Statement.
- 1.4. This Rebuttal on heritage matters addresses a number of points raised in the Proof of Evidence of Mr Tim Malim.
- 1.5. The rebuttal naturally does not cover every point raised by Mr Malim's Proof of Evidence, and my not referencing each point should not be taken to necessarily indicate my agreement with Mr Malim's approach, analysis or findings. Specifically, other than to address matters of factual inaccuracies, I have not addressed Mr Malim's commentary on the Cultural Heritage and Archaeology ES Chapter or Heritage Statement as I was not the author of either document.

2. Conservation Officer Comments

- 2.1. Mr Malim makes two references within his evidence to comments from the Local Authority Conservation Officer dated 16th December 2022. Whilst Heatons, on behalf of MBC, have confirmed via their letter dated 22nd August 2024 that these comments were included as part of the Local Authority Appeal Questionnaire, it remains that these were not provided to the Appellant during the determination of the application (Melton Borough Council "MBC" reference: 22/00537/FUL), are not transcribed in full within the Committee Report (*Core Document 3.1*) and have not made available on the MBC website to date (please find enclosed a date stamped PDF of the webpage at **Appendix 1**). The Appellant was also not made aware of their inclusion by the Local Authority as a Core Document prior to exchange.
- 2.2. I have reviewed the comments of the Conservation Officer and have the following observations to make on their content.
- 2.3. The comments were prepared by the Conservation Officer following receipt of an 'Independent Landscape Review' prepared by Cornwall Environmental Consultants ("CEC") on behalf of MBC, dated 1st December 2022 (*Core Document 7.19B*). As indicated by the name of the document, this considered landscape matters only, with this confirmed within Sections 1 and 2 of the CEC report.

- 2.4. §12.22 of the CEC review confirms that the 'Independent Landscape Review' considered the content of the following documents and plans:
- Chapter 2 of the ES – 'Landscape and Visual Impact Assessment' (*Core Document 1.31-2*) and supporting appendices (*Core Documents 1.33-2; 1.33-3; 1.33-4, 1.33-5, and 1.33-6*).
 - Non-Technical Summary of the ES (*Core Document 1.34*).
 - Supplementary Environmental Information Note dated 10th November (*Core Document 1.38*) and supporting appendices (*Core Document 1.38-1*).
 - Design and Access Statement (*Core Document 1.25*).
 - Figure 1.4: Site Layout and Landscape Strategy DWG No. P19-2022_10 Rev L (*Core Document 1.32-4*).
- 2.5. The Cultural Heritage and Archaeology ES Chapter and the supporting Heritage Statement are not referenced as documents reviewed by CEC, and the 'Independent Landscape Review' does not state that it considered heritage matters. Accordingly, there is no reference to industry standard guidance on the assessment of heritage assets within the document.
- 2.6. The Conservation Officer quotes two summary paragraphs from the CEC '*Independent Landscape Review*' which are concerned with the consideration of cumulative impacts, and CEC's assessment thereof. To confirm this is in response to the landscape assessments provided and not those concerning heritage. Cumulative impacts on relevant heritage assets were considered within Section 3.8 of the Cultural Heritage and Archaeology ES Chapter and Section 7 of the Heritage Statement. There is no reference to these assessments within the comments of the Conservation Officer. Accordingly, their reliance on any potential cumulative impacts on heritage matters is derived solely from comments provided in respect of the landscape assessments. This is not considered to be a robust approach.
- 2.7. As a result of the commentary provided within with the '*Independent Landscape Review*', the Conservation Officer comes to the conclusion that the identified high landscape harm would thus result in impacts to the following heritage assets – Easthorpe Conservation Area, Muston Conservation Area, Bottesford Conservation Area and the Grade I Listed Church of St Mary, Bottesford.
- 2.8. To confirm, there is no designated Conservation Area at Muston. It is my understanding via a review of information available on the Bottesford Parish Council website that discussions were held in 2021 between the Parish Council and the Local Authority Conservation Officer, as part of the Neighbourhood Plan process, regarding a review of the Conservation Areas within the parish. It is understood that a recommendation was made at a Parish Council meeting held in June 2021 for an approach to be made to Melton Borough Council to review the potential for the designation at Muston. I have identified no information on the Bottesford Parish Council or Melton Borough Council websites to indicate that this review has been taken forward. Even if it has been subject to internal review, there has yet to be any form of public consultation on a potential Conservation Area at Muston.

- 2.9. Furthermore, it is noted that neither the Easthorpe Conservation Area or Bottesford Conservation Area were referenced within the Reasons for Refusal, nor have they been raised within the Local Authority's Statement of Case (*Core Document 9.3*), later correspondence regarding confirmation of their heritage case (*Core Documents 10.2, 10.8, 10.9 and 10.12*), or the Statement of Common Ground (*Core Document 9.5*). Accordingly, they are understood not to form part of the case of MBC which is now in front of the Inspector.
- 2.10. The Conservation Officer continues by setting out:
- "When I was consulted as part of 19/01312/ENQMG, for a solar farm on the adjacent site to this application, I objected to the proposal on the same grounds. The Vale of Belvoir is one of the most distinctive character elements within the Borough of Melton and is defined by the extensive network of low-lying, neatly formed C18 / early C19 Enclosure field systems. The very gentle topography of the Vale allows each of the villages to be read as separate elements when travelling through this landscape, with the Belvoir ridge an ever-present and defining feature. Belvoir (beautiful view) Castle is indeed the monarch of the landscape. The Grade I listed building forms a direct, tangible relationship with large swathes of the Vale and even if there are not direct tangible views, there are intangible views, both to / from the Castle as well as the relevant conservation areas identified above."***
- 2.11. There is no evidence within the commentary set out above, or the wider response, that the Conservation Officer had visited the Appeal Site or considered the Appeal Site in detail, with their commentary appearing based upon a previous assessment of another solar farm application and the Vale of Belvoir in general.
- 2.12. In this regard, whilst it could be considered appropriate to identify the Vale of Belvoir 'as defined by the extensive network of low-lying, neatly formed C18 / early C19 Enclosure field systems' in a broad sense, as set out in my Evidence (and demonstrated by the historic sources included at Figures 4 and 5 of the Heritage Statement), the field pattern associated with the Appeal Site has been subject to change when compared to historic cartographic sources.
- 2.13. In considering the understanding and experience of settlements as separate elements within the landscape, the proposed solar farm would not result in coalescence. Thus, there would be no change to the understanding of the nearby settlements (Muston, Bottesford and Easthorpe) as separate settlements within the landscape.
- 2.14. With regard to views of the heritage assets and how these may contribute to the understanding, experience and appreciation of their significance, I refer to the detailed assessment provided in Sections 4–6 of my Evidence.
- 2.15. The Conservation Officer's reference to 'intangible views' is, however, questioned. By virtue of the meaning of tangible – something that is 'perceptible' or 'understood' – I would question how it is possible for there to be an 'intangible' view.
- 2.16. The Conservation Officer concludes their comments by setting out the following:
- "It is considered there will be less than substantial harm to the setting of the above stated conservation areas, as well as to the Grade I listed Belvoir Castle and the spire of St Mary the Virgin's Church in Bottesford, in accordance with Paragraph***

202 of the NPPF. I cannot identify the level of public benefit to outweigh this harm, but it is presumed the Belvoir Estate has already maximised opportunities to lease their land to solar farm companies. At some point this piecemeal erosion of the Vale's historic character will have to stop. Further approvals will only set a precedent for even further potential encroachments."

2.17. In response to these concluding comments:

- Neither the subsequent Reason for Refusal or confirmed case of MBC reflect the commentary provided by the Conservation Officer. Specifically:
 - As set out above, neither the Easthorpe or Bottesford Conservation Areas were referenced within the Reason for Refusal, and whilst the Reason for Refusal makes reference to Belvoir Castle and the Church of St Mary, it is also makes reference to the Registered Park and Garden at Belvoir, two unnamed Grade II* Listed Buildings and three unnamed Scheduled Monuments.
 - The two unnamed Grade II* Listed Buildings were subsequently identified by MBC via their Statement of Case (*Core Document 9.3*), later correspondence regarding confirmation of their heritage case (*Core Documents 10.2, 10.8, 10.9 and 10.12*) as the Church of St John the Baptist, Muston and the Village Cross at Muston, neither of which are referred to by the Conservation Officer.
 - The Scheduled Monuments were subsequently identified by MBC via their Statement of Case, later correspondence regarding confirmation of their heritage case as the aforementioned Village Cross, Moated Grange with Fishpond, Muston and Medieval Village Earthworks and Moat, Easthorpe. Again, none of these Scheduled Monument were referred to by the Conservation Officer.
 - As confirmed in my Evidence and the Statement of Common Ground (*Core Document 9.5*), MBC no longer consider that harm would arise to the Village Cross, the Church of St John the Baptist or the Medieval Village Earthworks and Moat, Easthorpe.
- The commentary regarding the Belvoir Estate and their use of land is based purely on supposition.
- Any future planning application would be considered on its own merits and accordingly the proposed development would not introduce a precedent in planning terms.

2.18. Overall, the Conservation Officer comments do not change my professional opinion on the proposals, as set out in my Proof of Evidence. However, I note that a) the commentary provided appears to have been founded on an inappropriate evidence base, b) and that the Reason for Refusal, and subsequent case of MBC, diverges conclusions of the Conservation Officer.

3. Non-Designated Heritage Assets

- 3.1. Mr Malim makes references within his evidence, including within his concluding paragraph, to 'non-designated heritage assets'. Specifically, within his conclusions at §5.3.1 Mr Malim states that 'less than substantial harm' would arise to non-designated heritage assets. As a result, Mr Bond then indicates at §8.36 of his Planning evidence that harm arises to 'non-designated heritage assets'.
- 3.2. Mr Malim does not, however, name any specific non-designated heritage assets, nor were non-designated heritage assets mentioned within the Reasons for Refusal, the Local Authority's Statement of Case (*Core Document 9.3*), later correspondence regarding confirmation of their heritage case (*Core Documents 10.2, 10.8, 10.9 and 10.12*), or the Statement of Common Ground (*Core Document 9.5*). Mr Malim also does not make reference to §209 of the NPPF in his evidence.
- 3.3. Based upon the above, it was not clear from Mr Malim's evidence whether MBC were seeking to expand its case, or whether references to 'non-designated heritage assets' were made in error and could be disregarded. Accordingly, the Appellant requested clarification from MBC on this matter on 20th August 2024.
- 3.4. A response from Heatons on behalf of MBC was received on 22nd August 2024, with this reading as follows:

"The Applicant identified harm to non-designated heritage assets in Chapter 3 of their ES – see in particular 3.5.7 – 3.5.12 and Tables 3.4 and 3.6. Those sections set out the NDHAs, the degree of harm and the nature of the harm.

The Council has not made references to NDHAs "throughout" its evidence. There are three very brief mentions of NDHAs, which set out the correct approach in policy to deal with harm which the Council had understood was common ground.

The Council is not seeking to expand its case. In particular, it is not contending that the harm identified by the Appellant amounts to a reason for refusing the development (and there is nothing in the Council's evidence to suggest this is the case).

If it is now no longer common ground that there is harm to NDHAs, or the Council has misunderstood the ES, the Council is very happy to discuss this further with the Appellant."

- 3.5. Firstly, it is welcomed that confirmation has been provided by MBC that they are not seeking to expand their case on this matter, and I can confirm on behalf of the Appellant that I do not consider that harm arises to any non-designated built heritage asset, via a change in 'setting'. However, with respect, the references to non-designated heritage assets made by Mr Malim and Mr Bond are not simply in regard to the correct approach to the consideration of non-designated heritage assets in the decision-making process, but rather both identify harm as arising to them. Irrespective, confirmation that these comments can be disregarded at the Inquiry is welcomed.

- 3.6. In regard to the 'non-designated heritage assets' discussed in §3.5.7 – 3.5.12 and Tables 3.4 and 3.6 of the Cultural Heritage and Archaeology ES Chapter (*Core Document 1.31.3*), as identified by Heatons, it is highlighted that this is in regard to non-designated archaeological remains within the Appeal Site. Potential impacts on below ground archaeology, including the features referenced in the §3.5.7 – 3.5.12 and Tables 3.4 and 3.6 of the Cultural Heritage and Archaeology ES Chapter, did not form a Reason for Refusal and the County Archaeologist did not object to the proposals (*Core Document 7.11*). A suitably worded condition pertaining to the understanding of below ground archaeological investigation is included within the draft conditions, in accordance with the recommendations from the County Archaeologist. I hope that this provides suitable clarification on this matter and confirms that this should not be a matter for consideration at the Inquiry.

4. Additional Designated Heritage Assets

- 4.1. Mr Malim also makes reference within his evidence to three designated heritage assets which fall outside of the MBC's heritage case (as confirmed on 29th July 2024; *Core Document 10.12*) and the assets identified as relevant to the consideration of this Inquiry within the Statement of Common Ground (*Core Document 9.5*) – namely, Scheduled Earthworks at Easthorpe; Easthorpe Conservation Area; and Grade II Listed Peacock Farmhouse.
- 4.2. As Mr Malim concludes that no harm would arise to these assets, it was my understanding that references to them resulted from Mr Malim's commentary on the ES Chapter and Heritage Statement **only**, and not because the MBC were seeking to expand their case. The Appellant requested clarification from MBC on this matter on 20th August 2024.
- 4.3. A response from Heatons on behalf of MBC was received on 22nd August 2024. This confirmed that MBC were not seeking to expand their case in regard to these assets and that they remained of the opinion that no harm would arise. I am grateful for the clarification provided on this matter.

5. Reference to 2014 Melton and Rushcliffe Landscape Sensitivity Study

- 5.1. At §4.2.42 of his evidence Mr Malim states that '*Protection of this landscape* [understood to refer to the Vale of Belvoir in general] *due to its importance for appreciating and experience the heritage significance of Belvoir Castle is outlined in the 2014 Melton and Rushcliffe Landscape Sensitivity Study*', and then provides a quote from that document.
- 5.2. Mr Malim does not provide a full citation for the referenced document; however, based upon its date it is understood to be the 'Melton and Rushcliffe Landscape Sensitivity Study: Wind Energy Development', with this being the only Melton and Rushcliffe Landscape Sensitivity Study identified as prepared in 2014. This document is included as Core Document 8.8.
- 5.3. The 'Melton and Rushcliffe Landscape Sensitivity Study: Wind Energy Development' was prepared by LUC on behalf of MBC and Rushcliffe Borough Council. The introduction section of the 'Melton and Rushcliffe Landscape Sensitivity Study: Wind Energy

Development' states that the study examines the "sensitivity of the landscape of the two boroughs to wind turbine development at a range of scales." (my emphasis). The study does not pertain to the consideration of solar farms, nor heritage assets.

- 5.4. The Melton and Rushcliffe Landscape Sensitivity Study: Wind Energy Development does not make reference to any Historic England (or 'English Heritage' as would then have been the case) guidance documents. In particular, the report does not make reference to 'Seeing the History in the View: A Method for assessing Heritage Significance within Views' the precursor to The Setting of Heritage Assets, as published in 2011). Any commentary on heritage assets is provided within the context of the consideration of the 'landscape' not their individual heritage significance. These are key considerations in the utilisation of the content of the Melton and Rushcliffe Landscape Sensitivity Study: Wind Energy Development in the context of assessing the historic environment, and in particular the contribution made by the 'setting' of heritage assets to their significance.
- 5.5. In this regard to it is noted that earlier within his evidence at §3.4.1.1, Mr Malim quotes from Historic England's Advice Note 15 Commercial Renewable Energy Development and the Historic Environment in order to clarify the distinction between Landscape and Visual Impact Assessment and heritage assessments, and their associated methodologies. Despite this, Mr Malim has still sought to reference the content of a landscape assessment which doesn't utilise relevant heritage related guidance and only provides commentary on heritage assets within the context of the consideration of the 'landscape' not their individual heritage significance.

6. Commentary on the 'Baseline' Assessment

- 6.1. Whilst my evidence which is now before the Inspector supersedes the assessments presented in the ES Chapter and Heritage Statement, I have noted that a number of comments made by Mr Malim in regard to the content of the supporting research and assessment associated with the ES Chapter and Heritage Statement are factually incorrect. In particular, several sources which Mr Malim states were not consulted or taken into account were discussed within the Heritage Statement. These factual inaccuracies are detailed within table below..
- 6.2. Mr Malim's evidence has led to Mr Bond at §8.35 of his Planning evidence stating that:

"Mr Malim considers that the appellant's assessment contains other flaws in its methodology including the omission of a glint and glare assessment for Belvoir Castle and a lack of a historic map regression exercise and sufficient analysis of the historic environment and the inter-relatedness of heritage assets that form local character and distinctiveness. I agree that these are important matters that ought to have been addressed at the application stage."
- 6.3. As the table below demonstrates the sources Mr Malim states were not consulted, in fact were.
- 6.4. In regard to both Mr Malim's and Mr Bond's reference to the consideration of 'Glint and Glare', I refer to the detailed assessment set out in Section 4 of my Evidence; however, I would like to reiterate here that no concerns were raised by MBC during the determination of the application regarding the extent of assessment provided within the Glint and Glare Assessment, nor was it suggested that such matters should be considered in the context of

the historic environment. 'Glint and Glare' was not raised by Historic England in either of their consultation responses on the application, contrary to Mr Bond's assertion at §3.18 of his Summary Proof of Evidence.

Quote from the Evidence of Mr Malim.	My Comments.
<p>§4.3.3.3 – <i>"If the appellant's assessment had included an analysis of historic mapping, the Tithe map and apportionments would have quickly identified any direct connection between the tenant of Peacock's Farm and the application site, and a more detailed assessment could have been made of the contribution that the setting makes to this Grade II listed building. However, the assessment was deficient in this detail."</i></p>	<p>A copy of the Tithe Map of Muston dated 1849 is included at Figure 4 of the Heritage Statement.</p> <p>The information provided by the 1849 Tithe Map and accompanying Apportionment is discussed at §5.21 and §5.22 of the Heritage Statement – <i>"... the 1849 tithe map for the parish of Muston, which covers the remainder of the site (Figure 4). No tithe mapping for Bottesford is available online... The Muston tithe map shows the rest of the site to be divided into a greater number of fields than exist today, but no buildings are shown. This land was also part of the Belvoir Estate (as is still the case) and split between three tenancies associated with adjacent farms along Woolsthorpe Lane on the south-west side of Muston. These farms are named Spray Farm, Peacock Farm and Mountain Ash Farm on 20th-century maps."</i></p> <p>In regard to Peacock Farmhouse, the Heritage Statement set outs the following:</p> <p>§6.157 – <i>"The site forms part of the Belvoir estate and was farmed by an estate tenant at Peacock Farmhouse, thereby the site has some contribution through an economic, social and historic connection with the farmhouse. However, the site affords no contribution with regards to visibility and views either to or from the Listed Building. The contribution of the site to the significance of the farmhouse is thereby low."</i></p> <p>§6.162 – <i>"Overall, there will be a change in views towards the farmhouse, but these views are generally limited from the public footpaths and do not contribute to the significance of the Listed Buildings. Whilst the proposed development will change the appearance of the site, the economic, social and historic connection with the estate will still be retained. In summary there shall be no harm to the significance of the farmhouse via any change to its setting."</i></p>

	<p>Mr Malim has confirmed at Table 4 of his evidence that he does not consider that harm arises to Peacock Farmhouse via a change in 'setting'.</p>
<p>§4.4.2 – <i>"The Heritage Statement and Cultural Heritage ES chapter (CD 1.33.7 and 1.33.3) have understandably focused on the designated heritage assets, with a lesser focus on non-designated assets, but this has led to the absence of an analysis of what the individual assets collectively mean for an understanding of the historic environment and its development over time."</i></p>	<p>Firstly, Mr Malim's use of the term 'understandably' is not clear. The Heritage Statement, where applicable, makes reference to possible non-designated heritage assets (see further below). It is also not clear which 'individual assets' Mr Malim is referring to.</p> <p><i>Planning Practice Guidance</i> ('PPG'; <i>Core Document 4.2B</i>) advises that clear and accessible up to date information on non-designated heritage assets should be available to provide greater clarity and certainty for developers and decision makers.</p> <p>In this context, MBC do not hold a Local List nor is there any information regarding 'non-designated heritage assets' on their website.</p> <p>The Heritage Statement consulted the Leicestershire and Lincolnshire Historic Environment Records ("HERs"). This is confirmed at several points within the Heritage Statement, including within the Methodology.</p> <p>In considering HER data and the identification of non-designated heritage assets, it is important to take into account HER data includes a variety of records, including but not limited to: standing structures; below ground archaeological features; excavated archaeological features; findspots of archaeological artefacts that in no longer <i>in-situ</i>; field name evidence, and documentary evidence of places and features from archival sources.</p> <p>This is reflected in Historic England guidance with <i>'Historic England Advice Note 7: Local Heritage Listing: Identifying and Conserving Local Heritage'</i> stating that:</p> <p><i>"The inclusion of a site or structure in an HER does not itself identify it as a non-designated heritage asset: inclusion merely records valuable information about it, and does not reflect the planning judgement needed to determine whether it does in fact have a degree of heritage</i></p>

	<p><i>significance which merits consideration in planning decisions."</i></p> <p>HER data was analysed in Section 5 of the Heritage Statement, alongside map regression, in order to establish an understanding of the development of the Appeal Site and its archaeological resource.</p> <p>In Section 5, the Heritage Statement clearly identifies that Iron Age and/or Romano-British present within the Appeal Site, as identified via cropmarks (recorded on the HER) and geophysical survey anomalies, are likely to constitute non-designated heritage assets. The Heritage Statement continues by confirming that are not considered to be of a significance commensurate with a designated heritage asset (i.e., a Scheduled Monument).</p> <p>With regard to the consideration of non-designated heritage assets as a result of a change in 'setting', the introduction to the 'setting assessment' identifies that Leicestershire and Lincolnshire HERs was consulted as part of the assessment process.</p> <p>PPG identifies that:</p> <p><i>"In some cases, local planning authorities may also identify non-designated heritage assets as part of the decision-making process on planning applications, for example, following archaeological investigations. It is helpful if plans note areas with potential for the discovery of non-designated heritage assets with archaeological interest. The historic environment record will be a useful indicator of archaeological potential in the area."</i></p> <p>MBC did raise any concerns regarding non-designated heritage assets during the determination of the application. Specifically, MBC did not identify any non-designated heritage assets which they considered had been excluded from the assessment and should be assessed.</p> <p>Furthermore, as confirmed above, potential impacts on non-designated heritage assets do not form part of the case of MBC at this Inquiry.</p>
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	<p>Accordingly, Mr Malim's comment on this matter is considered to be both unclear and irrelevant.</p>
<p>§4.4.2 – <i>"There has been no historic map regression exercise, in particular the assessment lacks the benefit of looking at the Bottesford Enclosure map and its landholding details or the tithe apportionments and map, and so only a very minimal attempt has been made in the appellant's assessment to understand how the application site articulates with the heritage assets within and around it, essential to better appreciating the contribution of setting to their heritage significance."</i></p>	<p>Mr Malim is incorrect to state that a map regression analysis had not been undertaken as part of the heritage assessment.</p> <p>As set out above, the Muston Tithe Map and accompanying Apportionment were consulted.</p> <p>Whilst not reproduced, the 1772 Bottesford Enclosure Map is discussed at 5.21 and 5.22 of the Heritage Statement – <i>"The earliest available historic mapping of the site is the 1772 enclosure map for the parish of Bottesford, which covers the north-western corner of the site (not reproduced)... The Bottesford enclosure map shows the north-western corner of the site to be divided into two fields (a different layout to what exists today), both of which were owned by the Duke of Rutland (Belvoir Castle)."</i></p> <p>The First Edition Ordnance Survey Map is included at Figure 5 of the Heritage Statement, and discussed at 5.23 alongside subsequent editions of the Ordnance Survey mapping.</p>

7. Summary

- 7.1. In summary, the evidence provided by Mr Malim does not change my professional opinion on the heritage significance of the relevant heritage assets or the proposed development, as detailed within my Proof of Evidence. For the reasons set out above, and as a result of the detailed evidence base upon which my opinion has been established, the Evidence set out in my Proof of Evidence should be preferred over MBC's analysis.

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