

Summary Proof of Evidence

By

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AOC Archaeology Group

On behalf of

AGR 4 Solar Limited

In relation to

CULTURAL HERITAGE

PRIORY FARM SOLAR ARRAY

**PROPOSED DEVELOPMENT OF A PHOTOVOLTAIC SOLAR ARRAY ON LAND AT GRAVELEY LANE EAST
OF GREAT WYMONDLEY, HERTFORDSHIRE.**

Call-in Planning Inquiry

Planning application reference: 21/03380/FP

Planning Inspectorate reference: APP/X1925/V/23/3323321

August 2023

1 Introduction

- 1.1 My name is Lynne Roy. I am a Senior Project Manager at AOC Archaeology Group. I am a Member of the Chartered Institute for Archaeologists (MCIfA), and AOC is a Registered Organisation with the Institute.
- 1.2 I am an archaeologist by qualification and have practised in the heritage sector since 2002, working initially as a field archaeologist for a range of academic and commercial institutions including the former Hertfordshire Archaeological Trust. I have worked as a heritage consultant since 2004. My full qualifications, accreditations and experience are set out in Section 1 of my Proof of Evidence.
- 1.3 This summary provides a synopsis of the case I have presented in my Proof of Evidence in respect of cultural heritage matters related to the call-in Planning Inquiry to be held in respect of the proposed solar farm development (the 'proposed development') on land at Graveley Lane to the East of Great Wymondley, North Hertfordshire (the 'site').
- 1.4 The evidence which I have prepared and provide for this appeal (reference APP/X1925/V/23/3323321) has been prepared and is given in accordance with guidance of the Chartered Institute for Archaeologists (CIfA). I confirm that the opinions expressed are my true and professional opinions.

2 Cultural Heritage Appraisal

- 2.1 In forming the assessment set out within my Proof of Evidence I have had regard to the NPPF (CD56) and relevant policy and guidance including the Historic England documents 'Statements of Heritage Significance' (CD90), 'The Setting of Heritage Assets' (CD91) and 'Conservation Principles' (CD92) as outlined in Section 3 of my Proof of Evidence.
- 2.2 As detailed in Section 4 of my Proof of Evidence, a proportionate and appropriate assessment of baseline conditions within the application site was established in accordance with best-practice and professional guidance as part of the application process. This involved preparation of a Heritage Impact Assessment (HIA) (CD5) and geophysical survey (CD32) which together established the archaeological potential and cultural heritage value of the application site and were used to identify the potential impact upon buried archaeological remains and accordingly design an appropriate mitigation strategy. The HIA also assessed the potential for the proposed development to impact upon the setting of designated heritage assets within 2km of the site.
- 2.3 The geophysical survey (CD32) identified three concentrations of anomalies of archaeological origin which indicated potential evidence for settlement and high temperature production processes. A buffer was applied around the extent of the identified anomalies and used to define three archaeologically sensitive areas within which AGR 4 Solar Limited (the Applicant) has agreed to finalise the design of the proposed development to ensure that development

within these sensitive areas would be achieved via ‘no dig’ solutions. A draft mitigation strategy for the proposed development site was set out in detail in a Written Scheme of Investigation (WSI) (CD 30) which included provision for and details of the implementation of ‘no dig’ solutions within the three areas of archaeological sensitivity and the undertaking of a 3% trial trench evaluation across the remainder of the site.

2.4 There are no designated heritage assets within the site and as such there would be no direct impacts upon designated heritage assets and no harm. In the case of the proposed development the potential for harm upon designated heritage assets relates solely to potential impacts upon their settings.

2.5 The HIA (CD5) identified less than substantial harm to the setting of four groups of heritage assets:

- The Grade II Listed Graveley Hall Farm and associated structures;
- Grade II* Listed St Mary’s Church at Little Wymondley;
- Great Wymondley Conservation Area including designated heritage assets within it;
- Scheduled Monument of Wymondley Priory and associated structures.

2.6 Section 4 of my Proof of Evidence provides my assessment of the significance and setting of each of these groups of identified heritage assets, together with an assessment of the predicted impact of the proposed development on their significance. My assessment concludes that there would be less than substantial harm at the lower end of the scale in each case.

3 Consultation responses related to Cultural Heritage

3.1 There were no objections to the proposed development on cultural heritage related matters from statutory consultees.

3.2 Section 5 of my Proof of Evidence provides a summary of consultation undertaken with the Historic Environment Advisor (HEA) for Hertfordshire County Council which culminated in the production of a draft WSI (CD30). I note and agree that amendments to the WSI will be required following the finalisation of design and construction methods post-consent. The Applicant is committed to undertaking further archaeological works as part of the post-consent process as reflected in the draft planning condition appended to the Statement of Common Ground (SoCG).

3.3 At Section 6 of my Proof of Evidence, I provide a brief synopsis of the Historic England response noting that I agree with Historic England that there would be a degree of less than substantial

harm upon the setting of some nearby heritage assets and that this harm would be limited in nature and thus at the lower end of the less than substantial harm scale.

- 3.4 Section 7 of my Proof of Evidence reviews the North Hertfordshire Council's (NHC) comments in relation to the proposed development as presented within their Committee Report (CD35a) and their Statement of Case (SoC). I agree with NHC that the proposed development would result in a degree of less than substantial harm to the setting of a range of nearby designated heritage assets. I do not agree that there would be harm to either the Graveley Conservation Area or the Grade II* Listed Wymondley Hall and provide an assessment (paragraphs 7.8-7.9 and 7.15-7.16) as to why I consider there would be no harm to the significance of these two designated assets. Notwithstanding the disagreement with regard to Graveley Conservation Area and Wymondley Hall, I agree with NHC that where less than substantial harm is identified it would be 'at the lower end of the spectrum'.

4 Third Party Responses related to Cultural Heritage

- 4.1 The responses received from third parties to the application have been analysed to identify those which include comments and objections in relation to cultural heritage issues. These comments are addressed within Section 8 of my Proof of Evidence. Within that section I have provided a table which summarises each response and provides a brief comment on where and how the issues raised have been addressed either in the submitted application documents or within my Proof of Evidence.
- 4.2 With regard to the field patterns within the site I argue that that the large arable fields of which the site is comprised are a largely mid to late 20th century construct and that the proposed development would not result in disturbance to the above ground layout of historic field systems.
- 4.3 It is my position that none of the information submitted by Third Parties provides evidence that the proposed development would result in a level of harm in relation to cultural heritage that extends beyond that identified in Section 2 above and detailed within Section 4 of my Proof of Evidence.

5 Conclusions

- 5.1 The proposed development has been designed to avoid known heritage assets as far as possible and a robust mitigation strategy has been proposed to allow for investigation of any hitherto unknown buried remains, this will include preservation of identified archaeological remains of likely significance through the implementation of 'no dig' solutions in specific areas of the site as defined within Section 5.4 of the draft WSI (CD 30). The physical loss of buried archaeological remains within the site can be adequately mitigated / offset by industry standard archaeological work in advance of construction as reflected in the draft planning condition appended to the SoCG.

5.2 I have summarised my own assessment of the predicted impact of the proposed development on the cultural significance of surrounding designated assets and concluded that where there is less than substantial harm it would be at the very lower end of the scale. In this regard my assessment is largely in agreement with the conclusions of Historic England and NHC.