

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 This Proof of Evidence Report ('this report') has been prepared by Lynne Roy, Senior Project Manager at AOC Holdings Ltd trading as AOC Archaeology Group. The report provides details of the case I will present in respect of cultural heritage matters at the Public 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').
- 1.2 I am a Fellow of the Society of Antiquaries of Scotland (FSA Scot) and a Member of the Chartered Institute for Archaeology (MCIfA). I hold degrees in Archaeology and Prehistory (BA 1st class honours) and Geoarchaeology (MSc Distinction). I have practised in the heritage sector since 2002, working as initially as 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 and I have over 17 years of experience working within the heritage consultancy sector.
- 1.3 I have worked on a wide range of development projects throughout the UK, including residential, power generation, commercial, industrial, and leisure and recreation schemes. I have gained extensive experience in the renewable energy sector over the past 17 years, preparing the archaeology and cultural heritage elements of Environmental Impact Assessments for over 50 renewable energy projects across the United Kingdom. In the last four years I have undertaken and/or managed the cultural heritage and archaeological assessments for over 20 solar farm projects in England. I have also provided feasibility and optioneering advice for numerous solar farm developments and am experienced in the design and management of mitigation works during the construction phase of solar farms.
- 1.4 The Heritage Impact Assessment (HIA) (CD5) dated September 2021 was prepared by my former colleague Philip Wright, an experienced AOC heritage consultant. My role within this project has been primarily advisory with my first involvement dating to October 2021 and the initial consultation with the Historic Environment Team at Hertfordshire County Council with regard to the scope of works required to inform the archaeological assessment of the site. . Members of the AOC geophysics survey team undertook a fluxgate gradiometer survey of the site in November 2021 culminating in a report (CD30) dated February 2022. Following consultation with the archaeological advisor to North Hertfordshire Council a draft Written Scheme of Investigation (CD30) outlining a robust archaeological mitigation strategy for the site was produced by my colleague Victoria Oleksy head of the AOC Consultancy Team.
- 1.5 The evidence which I have prepared and provide for this appeal (reference APP/X1925/V/23/3323321) in this report 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 Background and Scope

- 2.1 A description of the application site and its surroundings, and its planning history and relevant planning policy, is set out in the full application material, and the Statement of Common Ground ('SoCG'). Appendix C to the Planning Statement provides a detailed Heritage Impact Assessment (HIA) (CD5).
- 2.2 Prior to the resolution to grant permission for the proposed development by the Local Planning Authority (LPA) at North Hertfordshire Council (NHC) in November 2022, an agreement was reached between AOC, the Applicant and the Historic Environment Advisor (HEA) to NHC that the scheme would be acceptable in archaeological terms, subject to planning conditions including the application of no dig solutions within areas of archaeological interest. This agreement is reflected in the Statement of Common Ground (SoCG – section 4.1.2 (iii)).
- 2.3 In calling-in the application for determination, the Secretary of State initially indicated that the matters which he particularly wishes to be informed about for the purposes of his consideration of the application are:
- “a) The extent to which the proposed development is consistent with Government policies for protecting Green Belt land as set out in the FPPF (sic) (Chapter 13); and*
- b) The extent to which the proposed development is consistent with Government policies for meeting the challenge of climate change, flooding and coastal change as set out in the FPPF (sic) (Chapter 14); and*
- c) The extent to which the proposed development is consistent with Government policies for conserving and enhancing the natural environment as set out in the FPPF (sic) (Chapter 15); and*
- d) The extent to which the proposed development is consistent with the development plan for the area; and*
- e) Any other matters the Inspector considers relevant.”*
- 2.4 This report considers cultural heritage matters relevant to the Call-in inquiry for the proposed development. In this report I will explain how the information provided by the Applicant, in the application to NHC, allows for an assessment of the archaeological baseline and setting of cultural heritage assets in accordance with local and national planning policy. I will argue that the submitted WSI (CD30) allows for adequate protection and recording of archaeological remains and that the level of harm in relation to the setting of designated heritage assets is less than substantial and at the lower end of this scale (if such a scale were to exist).

2.5 Where specific heritage assets are referenced within this report they are accompanied by an 'Asset No' in parenthesis to allow for cross referencing with the Figures submitted as part of the HIA (CD5) alongside additional Figures submitted to support this report (CD107).

2.6 This report is structured as follows:

- Section 3 sets out an assessment of the cultural heritage related policies and guidance that are relevant to the proposed development;
- Section 4 sets out an appraisal of the proposed development from a cultural heritage perspective, including a summary of the work conducted before and during the application process;
- Section 5 sets out a response to Hertfordshire County Council Historic Environment advisor's assessment and conclusions regarding archaeology;
- Section 6 sets out a response to Historic England's assessment and conclusions regarding cultural heritage;
- Section 7 sets out a response to the LPA's assessment and conclusions regarding cultural heritage;
- Section 8 sets out a response to all cultural heritage related representations / objections lodged by third parties during the course of the planning application; and,
- Section 9 presents the conclusions.

3 Planning Policy and Guidance in relation to Cultural Heritage

3.1 Section 16 (paragraphs 189 – 208) of the 2021 National Planning Policy Framework (NPPF) (CD56) sets out the Government's planning policy approach to cultural heritage matters. At a local level, cultural heritage policy is provided by Policy HE1, HE2, HE3 and HE4 of the Local Plan (CD39) and Policy NHE9 of the Neighbourhood Plan (CD40). These local policies are consistent with the requirements of the NPPF.

3.2 The NPPF glossary (Annex 2) provides a description for the terms 'heritage asset', 'designated heritage asset', 'setting' and 'heritage significance'. These terms are used throughout this report, and are defined by the NPPF glossary as follows:

- **Heritage asset:** A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

- **Designated heritage asset:** A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.
- **Setting of a heritage asset:** 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.
- **Significance (for heritage policy):** The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

3.3 In their guidance on Analysing Significance in Heritage Assets (CD90), Historic England require that *'Where the proposal affects the setting, and related views, of a heritage asset, or assets, [the assessor must] clarify the contribution of the setting to the significance of the asset, or the way that the setting allows the significance to be appreciated.'* Similarly, The Xi'an Declaration (CD95) which set out the first internationally accepted definition of setting with regard to heritage assets and features, indicates that setting is important where it forms part of or contributes to the significance of a heritage asset. Thus, changes to the setting of an asset should be considered in the context of whether such change would reduce or harm their significance. Historic England define harm in their Conservation Principles (CD92) as a *'change for the worse, here primarily referring to the effect of inappropriate interventions on the heritage values of a place'* (CD92, 71).

3.4 National Planning Practice Guidance (PPG) sets out Government Guidance in planning matters. The Historic Environment section (CD64d) of this guidance requires an assessment to be made as to the level of harm which could be caused to designated heritage assets by a proposed development. It requires a judgement to be made as to whether that harm is 'substantial' or 'less than substantial'. The PPG notes that 'substantial' harm is a 'high test' and that as such it is unlikely to result in many cases. What matters in establishing whether harm is 'substantial' or not, relates to whether a change would seriously adversely affect those attributes or elements of a designated asset that contribute to, or give it, its significance (CD 64d; Paragraph: 018 Reference ID: 18a-018-20190723).

3.5 There is no recognised spectrum of degree of harm within the less than substantial harm category and consequently any less than substantial harm is subject to the policy test outlined in paragraph 202 of the NPPF (CD56). Nevertheless, there are numerous types of harm that will fall into the less than substantial category, including harm which might otherwise be described as very much less than substantial. The PPG's (CD64d) advice on calibration of less than substantial harm at Paragraph 018 states:

“... Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated ...

- 3.6 Judgements in relation to less than substantial harm accordingly frequently refer to a sliding scale of harm identifying whether harm is at the ‘higher’ ‘middle’ or ‘lower’ end of such a scale. For the purposes of this report, and in order to articulate as clearly as possible where, within the less than substantial harm category, I consider impacts would fall, I have applied a scale of 1 to 10 with ‘10’ being the higher end of ‘less than substantial harm’ and close to the threshold of ‘substantial’ and ‘1’ being a negligible level of harm where a change for the worse is barely discernible and close to a ‘neutral’ effect or no harm.

4 Archaeological and Cultural Heritage Appraisal

- 4.1 A proportionate and appropriate assessment of baseline conditions within the application site has been established in accordance with best-practice and professional guidance as part of the application process. This involved preparation of a HIA (CD5) and associated desk study to establish the archaeological potential and cultural heritage value of the application site; a Study Area was defined, to include the application site and its surroundings in a 1km radius.
- 4.2 The assessment included the identification of archaeological assets using Historic England's data for designated assets, the Hertfordshire Historic Environment Record (HER) and various documentary sources available at the Hertfordshire Archives and online. Historical and current Ordnance Survey (OS) maps, LiDAR data, oblique and vertical aerial photographs and available online satellite imagery were also reviewed to identify further hitherto unrecorded heritage assets which could be impacted by the proposed development. A walkover survey was undertaken on 24th August and 8th September 2021 by members of the AOC team. Additional walkover survey was undertaken on Wednesday 26th July 2023 by members of the AOC team. Visibility conditions during all surveys were good. A visual survey of the wider surroundings of the application site was also undertaken. The HIA identified all designated heritage assets within a 2km radius of the site. Site visits to designated assets were undertaken on 24th August and 8th September 2021 with supplementary visits undertaken on Wednesday 26th July 2023.
- 4.3 The HIA identified a High potential for prehistoric, Roman and medieval remains with the site given the recorded discovery of prehistoric flints and Iron Age pottery within the site and the site's proximity to both known Roman settlement and cemetery remains and to Wymondley Priory.
- 4.4 The results of geophysical surveys undertaken within the 1km study area assessed for the HIA have been shown to correspond well with underlying buried remains. Accordingly geophysical survey of the site was conducted from the 15th to 24th November 2021 and 85ha in total were surveyed using fluxgate gradiometers (CD32). The geophysical survey identified three concentrations of anomalies of archaeological origin which have been used to define

archaeologically sensitive areas. Each of the defined areas includes a buffer of 12m around the extent of the anomalies identified and can be summarised as follows:

- Area 1 (c. 1 hectare): Containing a round structure set within a D-shaped enclosure; tentatively interpreted as a ring-ditch of the type associated with prehistoric funerary monuments or possibly a later structure of hitherto unknown purpose.
- Area 2 (c. 8 hectares): Containing large reverse L-shaped group of anomalies interpreted as a possible Romano-British ladder settlement or later medieval settlement associated with Wymondley Priory to the west.
- Area 3 (c. 1 hectare): Encompassing a complex of rectilinear and circular enclosures of likely later prehistoric date.

4.5 All three activity foci also have evidence for settlement and for some sort of production involving high temperature processes. The northern part of the survey area contains evidence for extraction, so it seems likely that the inhabitants of these settlements were extracting and processing local raw materials.

4.6 Given the potential significance of the archaeological remains that appear in the evidence resulting from both the desk based assessment and geophysical survey to be present on the site, further consultation was undertaken with the HEA to NHC and a draft mitigation strategy was set out in detail in a Written Scheme of Investigation (WSI) (CD30). The WSI includes provision for preserving remains located within the three areas of archaeological sensitivity in situ via implementation of 'no dig' solutions and then undertaking a 3% trial trench evaluation across the remainder of the site.

4.7 It is acknowledged that the proposed development has the potential to impact upon hitherto unknown buried archaeological remains which may date from the prehistoric period onwards. The HIA (CD5) considered the potential for impacts on hitherto unknown buried archaeological remains and, in line with LDP Policy HE4, suggested a robust mitigation strategy to allow for any such remains to be adequately investigated and recorded in advance of development.

4.8 There are no designated heritage assets within the site and as such will 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.

4.9 The setting assessment presented within the HIA was undertaken in line with the requirements of NPPF (CD56) and Historic England's setting guidance (CD91). Site visits were undertaken to designated heritage assets within the 2km Study Area subject to safe public access. Where safe public access was not possible, designated assets were assessed from the

nearest available public right of way. These site visits established the current setting of the assets, how setting contributes to the significance and appreciation of the assets and how the Proposed Development could potentially impact upon setting, such that it could cause harm and affect significance. The HIA identified less than substantial harm to the setting of four groups of heritage assets:

- The Grade II Listed Graveley Hall Farm (Asset 57) and associated structures (Asset 44, 45 and 80);
- Grade II* Listed St Mary's Church at Little Wymondley (Asset 22);
- Great Wymondley Conservation Area (Asset 265) including designated heritage assets within it (;
- Scheduled Monument of Wymondley Priory (Asset 1), with associated structures.

4.10 As per Section 3, while the policy test outlined in paragraph 202 of the NPPF (CD56) recognises no distinction of scale in the less than substantial harm category, the PPG (CD 64d) requires clear articulation of the extent of harm and I consider it appropriate here to provide a judgement as to the scale of less than substantial harm. Accordingly, I provide below my assessment of that scale of less than substantial harm for each of the above designated assets or asset groups.

Graveley Hall Farm (Asset 57)

4.11 The Grade II Listed Graveley Hall (Asset 57) comprises a manor house of medieval origin largely rebuilt in the 17th century. The principal elevation of the hall faces south and it is set at the rear of a courtyard formed by associated Grade II Listed 16th and 17th century barns (Asset 44) and a range of farm buildings (Asset 45), together with a 17th century Grade II Listed boundary wall (Asset 80). This group of buildings is located at the eastern edge of Graveley Conservation Area (Asset 266) with long range views generally inhibited by surrounding vegetation and built structures. No key views out from the complex have been identified. Key views towards the Graveley Hall complex are from the south-west. As identified within paragraph 6.2.7 of the HIA (CD5), archive research has shown that much of the southern part of the site was located within the historic landholding of Graveley Hall Farm and the rural setting of these buildings and their historic association with the wider land controlled by the Farm contributes positively to an understanding and appreciation of their significance.

4.12 As shown on Figures 1 and 2 (CD107) Graveley Hall Farm would have no visibility of the proposed development. Furthermore, there would be no visibility of the proposed development in views on approach to the farm and associated designated assets. Graveley Hall Farm is located to the east of the site and to the east of a low ridge along which the A1(M) runs in a north-south direction effectively severing any legible visual relationship between the assets and the site. The identified less than substantial harm on the setting of this group of

assets is thus limited to the change in land use within a rural area historically associated with Graveley Hall. As this relationship can only be appreciated with prior knowledge of historic landholdings, and is not readily appreciable in the modern landscape, the level of less than substantial harm represented by the proposed development would be at the very low end of the scale. If a scale of 1-10 were to be applied to the level of harm, it is my opinion that a value of '1' would be appropriate.

Grade II Listed St Mary's Church at Little Wymondley (Asset 22)*

- 4.13 The Grade II* Listed St Mary's Church at Little Wymondley (Asset 22) dates from the 12th century and its significance lies primarily in its exceptional historic and architectural interest. However, some significance is also derived from the landscape setting in which it is experienced. The Church is set within its churchyard on elevated ground to the south of the village of Little Wymondley, the churchyard is bound by a combination of low hedges, fences and mature trees allowing for occasional long range views across the surrounding village and wider agricultural landscape. The Church's topographical position on a low rise combined with the relatively open nature of its churchyard also allows for the church to be viewed intermittently across the landscape. The relatively low undulating character of the surrounding agricultural landscape, featuring large open fields, including the site, provides an opportunity to gain views towards the Church between gaps in field boundaries and along roads and allows for an appreciation of the rural qualities of its wider setting. This visibility also contributes to our understanding of the Church as a religious building designed as a visible reminder to parishioners of the importance of the Church in daily life.
- 4.14 Site visits have indicated only very limited visibility of the site from specific parts of the churchyard, with views towards the site only possible from the western side of the Church. This is supported by Figure 2 (CD107) which shows limited and patchy visibility from within the churchyard. As shown on Figure 2 views from within the churchyard are anticipated to encompass only a small part of the proposed development. The proposed development would be seen over the roofs of modern buildings and beyond the intervening railway line. The Church can be distantly glimpsed amongst trees from the higher eastern parts of the site adjacent to the A1(M). The identified less than substantial harm on the setting of St Mary's Church at Little Wymondley is thus limited to a slight alteration to the wider rural setting of the church which makes a small contribution to the asset's overall significance. If a scale of 1-10 were to be applied to the level of less than substantial harm, it is my opinion that a value of 2' would be appropriate.

Great Wymondley Conservation Area (Asset 265) and associated designated heritage assets (Assets 2, 5, 15, 21, 39, 41, 64 to 68, 84 and 85)

- 4.15 Great Wymondley Conservation Area (Asset 265) encompasses the whole of the village of Great Wymondley (CD94); it includes the Scheduled Monument of Great Wymondley Castle (Asset 2) and the Grade I Listed 12th century Church of St Mary the Virgin (Asset 5), together with several Grade II* and Grade II Listed Buildings of medieval and post-medieval date to the

west of the church. The Church of St Mary the Virgin (Asset 5) and the mound of the motte and bailey of Great Wymondley Castle (Asset 2) are located adjacent to the village green which forms the central focal point of the Conservation Area along with the nearby Grade II* Listed brick built Delamere House (Asset 15) which has an historic association with Cardinal Wolsey (CD103). As noted in the Conservation Area Character Statement for Great Wymondley (CD93, 4), the village is considered to retain its historical rural setting despite the contemporary proximity of Hitchin to the west, Letchworth Garden City to the north, the A1(M) to the east and the A602 to the south. The Statement of Special Interest for the Conservation Area notes that it '*preserves the whole of the character of the whole developed area of the settlement of Great Wymondley, a settlement with pre-Conquest origins*' (CD93, 6). The Conservation Area Character Statement identifies three key views within the designation;

- From footpath Wymondley 005 looking west across the Scheduled Monument towards the Church of St Mary the Virgin.
- From Arch Road, adjacent to The Croft, looking east towards the Church of St Mary the Virgin.
- From Church Green looking south across fields to Delamere House.

4.16 The identified key views are thus all internal to the Conservation Area and it is considered that the majority of the significance of the Conservation Area is derived from the architectural and historical interest of the designated assets within it and their associated visual and contextual interrelationships. The Conservation Area also has a direct historic association with surrounding agricultural land and it is considered that some of the Conservation Area's significance is derived from its wider rural setting.

4.17 The Church of St Mary the Virgin (Asset 5) is of 12th century origin with a restored 15th century tower with castellated battlements (CD106) which can be glimpsed from the north-west part of the site and from the east along the edge adjacent to the A1 (M). As with the Conservation Area, the majority of the Church's heritage significance is derived from its architectural and historic interest but the wider rural setting, including views of the tower across the landscape, also contributes to its significance. However, while the Church tower is visible across the landscape, the close approaches to the Church itself are relatively enclosed and it is set within a vegetated plot churchyard which limits views out across the landscape. Mature vegetation similarly surrounds the Scheduled earthwork remains of Great Wymondley Castle (Asset 2), likely limiting potential glimpses of the proposed development from the castle motte to winter months. The castle is set upon an elevated level area of ground to the east of the village and was likely designed to look over the immediate surrounding landscape, particularly over the lower lying floodplain of the River Purwell to the south and south-east. The Grade II Listed Long Close (Asset 68; CD 104) is located in the north-east of the Conservation Area and is set within wooded grounds which limit visibility across the landscape from ground level. It is likely that the proposed development would be visible in views north-east from the upper storey of this building. There would be no visibility of the proposed development from the Grade II* Listed Manor House (Asset 21; CD105).

- 4.18 As shown on Figure 1 (CD107) the majority of Great Wymondley Conservation Area is theoretically intervisible with the proposed development. However, the north and east parts of the Conservation Area are bound by mature trees which limit and in most cases prevent intervisibility with the site from the majority of the Conservation Area and its associated Listed Buildings as demonstrated on Figure 2 (CD107). The clearest potential views of the proposed development would be from the eastern edge of the Conservation Area, near to the late-19th century non-designated Milksey Cottages, formerly Priory Cottages. From here, distant views of part of the southern part of the proposed development are likely as shown on Figure 2.
- 4.19 Figure 2 also demonstrates that western, northern and south west (Arch Road) approaches to the Conservation Area by road would have extremely limited or no visibility of the proposed development. However, it is acknowledged that the proposed development would be visible on approaches to Great Wymondley Conservation Area from Graveley Lane from the east and from Priory Lane to the south.
- 4.20 The proposed development would thus not be visible from the buildings and spaces within the Conservation Area from which it derives its character and appearance, as well as its overall significance. There would be no impact on the historic and architectural value of the designated assets within the Conservation Area and the morphology of the settlement which largely relates to development along the roads and around the castle, church and village green would be unchanged. The proposed development would introduce a modern development into a small number of views from the eastern margins of the Conservation Area but would not feature in any of the identified key views. The proposed development would cause less than substantial harm. If a scale of 1-10 were to be applied to the level of less than substantial harm, it is my opinion that a value of '2' would be appropriate.

Wymondley Priory (Asset 1) and associated designated heritage assets (Assets 6, 16, 42, 77 and 86)

- 4.21 Wymondley Priory is a well-preserved example of an Augustinian monastic establishment of 13th century origin and is associated with evidence for extensive and well-preserved tenant settlement (CD100). Of significance is the survival of structures within the priory precinct as well as related earthworks in the outlying areas. The clear spatial relationship between the priory and the outlying earthworks, and the diversity of structural components present, offers particularly valuable insights into the religious and economic lifestyles of monastic communities. The Grade I Listed Priory (CD98) and Grade II* Listed Tithe barn (CD99) are located within the moated enclosure with the surrounding moat ditch visible except where it is built over in the south-west. Outside the moated platform in the surrounding pasture fields is an extensive series of earthworks, clearly visible both on the ground and on aerial photography and LiDAR and satellite imagery. To the south is a hollow-way aligned on the possibly original causeway across the moat, while to the east is a well-defined area of ridge and furrow field system. To the north are house platforms and enclosures, bound on the west by ponds and to the east by a hollow-way. The line of the water course linking the conduit

head (Asset 77) to the moated enclosure surrounding the house is also readily discernible, although at its north-eastern end it is now largely ploughed over and appreciable only through LiDAR.

- 4.22 A detailed analysis of the historic and architectural details of the group of designated assets at Wymondley Priory by Dogget (CD97) evidences the complex history of development of the assets within the priory precinct and demonstrates that they derive a substantial proportion of their significance from their combined exceptional historic and architectural interest. As noted in paragraph 6.2.17 of the HIA (CD5), the south of the site lies within the historic landholding of the priory. The spatial relationship between the conduit head and the priory forms a key part of the setting of the complex and allows the historic function of the conduit to be appreciated. The wider agricultural setting of the priory complex and in particular its association with the open grounds of 'The Park' to the north also contributes to an understanding and appreciation of the significance of the assets.
- 4.23 As shown on Figure 2 (CD107) the majority of Listed Buildings within the priory precinct would have no visibility of the proposed development by virtue of their secluded wooded settings and locations at the base of a gentle slope. Views of the proposed development would be limited to the upper storey of the Grade I Listed Priory (Asset 6). The northern area of the Scheduled Monument would have visibility of between 1-17% of the proposed development increasing to 34% at the north-eastern boundary of the Scheduled Monument. The Grade II Listed conduit head (Asset 77) would theoretically have visibility of up to 17% of the proposed development. However, the remains of the building are located within a dense copse of trees which prevent visibility out across the landscape. Site visits have also indicated that the mature hedgerow along the western boundary of the site would preclude any potential intervisibility between the conduit head and the proposed development with any potential views being limited to glimpses to the south-east where a track creates a break in the hedgerow.
- 4.24 The proposed development would thus be located within the wider agricultural setting of the priory within land historically associated with the precinct. Visibility of the proposed development from within the priory precinct would be limited and the proposed landscape planting mitigation would further limit any visibility. It would remain possible to understand and appreciate the priory in its setting.
- 4.25 Given that the proposed development would largely not be visible from within the priory precinct or from the conduit head it is anticipated to cause less than substantial harm as a consequence of a change to the land use within land historically associated with the priory. If a scale of 1-10 were to be applied to the level of less than substantial harm, it is my opinion that a value of '3' would be appropriate.

5 Historic Environment Advisor to Hertfordshire County Council response related to Cultural Heritage

- 5.1 Daniel Phillips, Historic Environment Advisor, HEA for Hertfordshire County, provided a response to the application on 11th October 2022. The HEA response stated that: *'The site contains a Scheduled Monument (SM 1013338)'. Further stating that: 'The site borders the Scheduled Monument of Wymondley Priory (SM1013338), no more than 100m to the west, part of which, a structure called the Conduit Head lies within the development site itself'.*
- 5.2 For the avoidance of doubt, the site does not contain a Scheduled Monument. The Scheduled Monument known as Wymondley Priory, barn, moat, associated earthworks, enclosures, platforms, hollow-way and conduit head (Asset 1; SM 1013338) includes the site of a Medieval Augustinian priory, a moat, associated earthworks and enclosures, a hollow-way, a later Medieval Barn and conduit well-head as detailed within the official designation listing included at CD100 and discussed in paragraph 4.21 above. The extent of the Scheduled Monument is shown on Figure 4 of the HIA (CD5) and on Figures 1 and 2 appended to this report (CD107). The Conduit Head element of the Scheduled Monument is not within the site and is located 70m to the west as shown on the aforementioned Figures. The HEA response contains no reference to impacts on Scheduled Monuments.
- 5.3 As outlined in the HEA response, detailed discussions were undertaken between the HEA, the Applicant and AOC with regard to the archaeological constraints within the site and a mitigation methodology was agreed should planning consent be granted. This included the removal of development impact within the three areas identified in Section 4 above through the adoption of a no-dig policy and archaeological trial trenching throughout the remainder of the site. The mitigation methodology referred to was outlined in a draft WSI (CD30).
- 5.4 The HEA response notes that they are broadly happy with the submitted archaeological WSI but highlights that groundworks required for cable troughs as specified in paragraph 5.3 of that document would require exploration of alternative options. A *'number of other amendments'* are also noted as being required prior to approval of the WSI. The HEA concludes that *'Should planning consent be granted, then the applicant should be requested to re-submit an amended. WSI postconsent, in order so that we can approve and advise the discharge of said WSI.'*
- 5.5 It is noted and agreed that amendments to the WSI will be required following the finalisation of design and construction methods post-consent and 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 SoCG.

6 Historic England Response related to Cultural Heritage

- 6.1 Historic England were consulted on the application and provided a response by email dated 23rd March 2022. Historic England identified designated assets within a 1km radius of the site to include two Conservation Areas, two Scheduled Monuments and four highly-graded (II*/I) Listed Buildings. They further noted that the 2km study area used for the assessment was contextually appropriate. Historic England concluded that:

‘Having considered the documentation submitted with the application, we conclude that the proposed development would have some limited impact upon the setting of nearby heritage assets, and we judge that this would equate to a level of harm that would be less than substantial in NPPF terms. We would therefore have no objections should your authority be minded to approve the application.’

- 6.2 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. The Historic England response does not identify the assets which they consider would be subject to less than substantial harm and thus I cannot be sure if we are in agreement with regard to which assets have the potential to be subject to less than substantial harm. For the avoidance of doubt, I do not consider that the less than substantial harm extends to any assets beyond those identified in the submitted HIA and discussed within Section 4 of this report. I provide my assessment of the Graveley Conservation Area in paragraphs 7.8-7.9 of this report and I maintain that there would be no harm to the significance of the Graveley Conservation Area.

7 LPA Responses related to Cultural Heritage

- 7.1 On 17th November 2022, the proposed development was presented to the NHC planning committee and received a positive recommendation for approval. Paragraphs 4.1.5 to 4.1.7 of the Committee Report (CD35a) outline the cultural heritage context of the site:

‘The site is within the setting of nearby listed buildings, Scheduled Monuments and Great Wymondley Conservation Area and is within an area of archaeological interest.’

The grade II listed Conduit Head at Priory Farm is located about 70m to the west of the application site. This designated heritage asset forms part of the Wymondley Priory Scheduled Monument, the main part of which is located about 300m to the west, separated from the site by an arable field. Within the Priory there is a Grade I listed building and associated Grade II Tithe Barn, along with two further grade II listed buildings.*

In addition, the site of Great Wymondley Castle, a Scheduled Monument is located about 260m from the application site. There is evidence of a Roman Settlement between the northern part of the site and Great Wymondley’

- 7.2 Paragraphs 4.5.80 -4.5.111 of the Committee Report (CD 35) provide details with regard to cultural heritage in terms of the planning context and identified levels of heritage harm with paragraphs 4.5.93-4.5.96 dealing in turn with the four groups of heritage assets assessed in the HIA (CD5) and further discussed in paragraphs 4.11-4.25 of this report.
- 7.3 In considering the Grade II Listed Graveley Hall in paragraph 4.5.94 (CD35a) the Committee Report agrees with the HIA that the proposed development would not substantially alter the historic agricultural setting of Graveley Hall Farm or diminish the ability to appreciate its historic character and concludes that the proposed development would result in less than substantial harm to its setting.
- 7.4 With regard to St Mary’s Church at Little Wymondley, the Officer agrees with the HIA that the proposed development would not materially alter the setting of the church. No statement is provided as to whether or not the Officer considers that this would result in harm to the cultural significance of the church.
- 7.5 Concerning the Great Wymondley Conservation Area (Asset 265), including designated heritage assets within it, the Committee Report concludes that the site forms part of the rural setting of the Conservation Area. The Officer agrees with the submitted HIA that there would be less than substantial harm to the significance of Great Wymondley Conservation Area and the setting of assets within it.
- 7.6 With regard to the setting of Wymondley Priory Scheduled Monument, the Committee Report acknowledges the limited intervisibility with the proposed development and concludes that *‘there is an identified historic relationship with the priory and the application site forms part of the wider agricultural setting of the listed building. The proposed development would affect this setting and cause less than substantial harm to the heritage significance of Wymondley Priory.* (CD 35, para 4.5.96)
- 7.7 The Committee Report (CD 35, para 4.5.97) also acknowledges the roles of the proposed landscape planting mitigation concluding that this would *‘limit intervisibility further’*. No comment is provided with regard to whether this would be considered to mitigate the level of harm previously noted.
- 7.8 At paragraph 4.5.98 the Committee Report identifies a *‘negligible level of harm to the significance of Graveley Conservation Area through the proposed development within its setting’*. It is noted that the HIA (CD 5) did not identify any harm to the significance of the Graveley Conservation Area (Asset 266). As shown on Figure 1 (CD107) there would be no theoretical visibility of the proposed development from within the majority of the Conservation Area owing to its low lying topographic location at the base of a shallow valley with only 1-17% of the proposed development theoretically visible from the south-east edge of the Conservation Area. However, as shown on Figure 2, which presents a screened Zone of Theoretical Visibility (ZTV), there would be no visibility of the proposed development from

within any parts of the Conservation Area or on any approaches to it. The A1(M) motorway intervenes between the Graveley Conservation Area and the site, effectively severing any visible legible historic relationships between these two areas. I thus consider that the site forms part of the setting of the Conservation Area only insofar as it is historically documented to be associated with a defined group of Listed Buildings (the Graveley Hall assets) located within the designation.

7.9 The less than substantial harm to the Graveley Hall assets identified in the HIA and discussed in paragraphs 4.11-4.12 of this report relates to the documented historical association of Graveley Hall with the land within the site (albeit that there is no intervisibility). This historical land ownership association does not extend across the whole Conservation Area, indeed the existence of multiple landowners and associated distinct farm complexes is considered to have influenced the historical multcentred development of Graveley (CD 30, Appendix 1). The presence of distinct farm complexes taken together with the historic Church of St Mary, and the linear development along the former Great North Road (now the High Street) and the associated diverse architectural styles and built fabric of these assets contribute to the overall character and appearance of the Conservation Area and thus to its significance. In addition the surrounding immediately adjacent agricultural fields create a rural setting which makes some contribution to the character of the Conservation Area. However, I do not consider that the contribution made by the visual rural setting of the Conservation Area extends beyond the ridge upon which the A1 (M) is located and thus the site does not make a specific contribution to the significance of the Conservation Area. The proposed development would have no effect on those elements of the Conservation Area that contribute to its character and appearance and thus accordingly I conclude that there would be no harm to its significance. No information is provided in the Committee Report as to how the proposed development is considered to result in the identified ‘negligible harm’ to significance beyond a statement that the proposed development is within its setting. It is thus not clear to what extent there is disagreement between my assessment of the Conservation Area and that of NHC. However, on the basis of the above it is assumed that NHC consider that the land within the site makes a contribution to the overall character and appearance of the Conservation Area whereas I consider that it does not. I maintain that the proposed development would result in no harm to the significance of the Graveley Conservation Area.

7.10 Paragraph 4.5.100 of the Committee Report concludes that the identified less than substantial harm resulting from the proposed development would be *‘towards the lower end of the spectrum of less than substantial harm’*. As detailed in Section 4 of this report, all less than substantial harm to designated heritage assets that I have identified in relation to the proposed development would be at the lower end of the scale and thus I am in agreement with the Committee Report in this regard.

7.11 Paragraphs 4.5.102 to 4.5.110 of the Committee Report (CD35a) consider the proposed development in relation to archaeology and largely mirror the HEA response to the proposed development as discussed in Section 5 of this report. The LPA concludes at paragraph 4.5.110

that *'the impact of the proposed development can be adequately addressed by planning condition and therefore subject to the recommended conditions, this matter is neutral in the planning balance.'*

7.12 In addition to the Committee Report NHC has also submitted a Statement of Case (SoC) in relation to this Call-in inquiry. Paragraphs 5.18 – 5.23 set out the LPA's case with reference to cultural heritage. The NHC SoC states that the proposed development would cause less than substantial harm, at the lower end of the spectrum, to the significance of the following designated heritage assets, specifically through development within their setting:

- Graveley Hall Grade II Listed
- St. Mary's Church at Little Wymondley Grade I Listed
- Wymondley Priory Scheduled Monument
- The Priory (dwelling) Grade I listed
- Tithe Barn at Wymondley Priory Grade II* Listed
- Barn and attached stable at Priory Farm Grade II Listed
- Garden walls at the Priory Grade II Listed
- Listed Conduit Head Grade II
- Wymondley Castle Scheduled Monument
- Castle Cottage Grade II Listed
- Wymondley Hall Grade II* Listed
- Great Wymondley Conservation Area

7.13 No detail is provided as to how NHC considers the cultural significance of each of the above designated assets would be affected but the majority of those identified are consistent with those identified as subject to less than substantial harm in the HIA (CD5) and identified in the Committee Report (CD35a).

7.14 The specific identification of less than substantial harm to the Grade II Listed Castle Cottage (Asset 41) within the NHC SoC is of note. Castle Cottage is located within the Great Wymondley Conservation Area designation and thus by extension was identified as subject to less than substantial harm. However, as shown on Figure 2, there is predicted to be no visibility of the proposed development from Castle Cottage and its immediate approaches. Site visits have

demonstrated that views of Castle Cottage from the lane to the north are screened by a large hedge and only possible from the gate entrance. Views from the rear of Castle Cottage are over an open pasture field towards the site but do not extend to the site itself. Accordingly, it is judged that less than substantial harm would be experienced as part of the overall change to the wider rural setting of the Conservation Area. If a scale of 1-10 were to be applied to the level of less than substantial harm to the setting of Castle Cottage, it is my opinion that a value of '1' would be appropriate.

7.15 The Grade II* Listed Wymondley Hall (Asset 10; CD 102) is located on the northern margins of the settlement of Little Wymondley off the east side of Priory Lane. Wymondley Hall is of late 16th century date and derives the majority of its significance from its exceptional architectural interest and its historical association with the Nedham family, Lords of the Manor. Wymondley Hall was historically the home farm to Wymondley Priory and thus it has a direct historical association and link to the Priory (Asset 1) which is set to its north further along Priory Lane. Wymondley Hall is set just to the north of the railway line within mature vegetated grounds and is associated with numerous non-designated ancillary farm buildings of post-medieval date which contribute to our understanding and appreciation of the hall as the former manor farm. Immediately to the north of Wymondley Hall are a series of large modern warehouse style buildings which form part of a small industrial estate hosting numerous local businesses. These modern buildings are located between Wymondley Hall and Wymondley Priory and prevent appreciation of the historical connection between the former manor farm and the Priory. These intervening buildings would also serve to prevent any visibility of the proposed development. The proposed development would be located beyond those elements of setting that contribute to the significance of Wymondley Hall and it would not be visible from this Listed Building. The HIA did not identify any harm to the setting of the building. I agree with that assessment and conclude that there would be no harm to the Grade II* Listed Wymondley Hall.

7.16 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 the Grade II* Listed Wymondley Hall. The NHC SoC does not state how they consider harm would be caused to the Grade II* Listed Wymondley Hall and thus it is not possible to identify how or where we differ in our assessments with regard to this specific heritage asset. As detailed in Section 4 of this report I consider that, where identified, the level of less than substantial harm would be at the lower end of the scale for all of the designated assets for which harm has been identified. In this regard I agree with NHC who similarly identify any harm to be 'at the lower end of the spectrum'.

8 Third Party Responses related to Cultural Heritage

8.1 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 summarised in the table below, along with a brief comment on where and how

they are addressed either in the submitted application documents or within this report. Where comments are repeated or the same, they have been grouped and are discussed in accordance with broad themes below.

Name of Third Party	Comment/Objection	Response
Wymondley Parish Council	<p><i>There is significant archaeological interest on the site and the historic field pattern should not be disturbed nor should it have random trench investigation and permission should be refused due to archaeological interest of the site alone'</i></p>	<p>Further discussion regarding the historic field pattern is provided at paragraph 8.2 of this report. The historic field pattern will be retained with no change to field boundaries. Areas of high archaeological sensitivity have been avoided and a robust mitigation strategy proposed as outlined in Section 4 of this Report.</p>
North Hertfordshire Archaeological Society	<p><i>So far, inadequate level of archaeological information has been provided and geophysical survey or trial trenching should be undertaken. There is known archaeological interest within the site from Pre-historic to Medieval periods. The site lies within a defined Area of Archaeological Importance in the Local Plan which should be extended to include the whole site.</i></p> <p>Note that the letter of objection dated 12 July 2023 refers to letter dated 30 January 2022 with no change in opinion.</p>	<p>As outlined in Section 4 of this report an archaeological geophysical survey (CD 32) was undertaken across the site and a draft WSI (CD 5) submitted to NHC's archaeological advisors for comment. The subsequent letter received from North Hertfordshire Archaeological Society dated 12th July 2023 makes no reference to this additional level of submitted archaeological information and it thus remains unclear if the North Hertfordshire Archaeological Society are aware that additional works have been undertaken and if their objection would still stand if the additional archaeological information had been reviewed.</p>
AFA Planning Consultants	<p><i>'...the solar farm will create a blight on the nearby Great Wymondley Conservation Area and detrimentally affect the settings of statutorily listed properties in the local parishes.</i></p> <p><i>There are over 40 listed properties in the parishes of Great and Little Wymondley, including the Grade I listed Great Wymondley church; Long</i></p>	<p>These assets have been assessed and detailed information provided regarding impacts on their settings as part of the application. No detail is provided by AFA Planning Consultants as to how the 'historic value' of the assets would be diminished.</p> <p>Further analysis of potential impacts on the setting of the identified assets is</p>

Name of Third Party	Comment/Objection	Response
	<p><i>Close, Delamere House and the Manor Grade II and Grade II* to the east of the village; and Wymondley Hall on Priory Lane just to the south of the solar farm. The setting of the Grade I Priory and Grade II* Priory Barn would have the solar arrays circling to the rear, disturbing its setting and archaeology. If the development were approved the historic value of all of these assets would be severely diminished</i></p>	<p>included within paragraphs 4.11-4.25 within Section 4 of this report and a level of less than substantial harm has been identified in each case.</p> <p>Wymondley Hall is discussed within paragraph 7.14 of this report and no harm to its significance has been identified.</p>
<p>Deolinda Eltringham (North Herts & Stevenage Green Party)</p>	<p><i>'locations of archaeological interest should be protected'</i></p>	<p>Impacts upon areas of known and likely high archaeological potential within the site would be avoided through the implementation of the 'no dig' solutions outlined in the draft WSI (CD30). A robust archaeological mitigation strategy has been proposed as outlined in Section 4 of this Report and would allow for preservation by record of any hitherto unknown archaeological remains.</p>
<p>Paul Kennedy (Great Wymondley Village Association and local resident)</p>	<p><i>The Village Association finds it unacceptable that any development takes place in the fields adjacent to the Priory and Tythe Barn which are both of such historical importance to not only the village but the county as a whole.</i></p> <p><i>The Village Association strongly suggests historic field patterns in this location should not be disturbed as it is such an important link to our areas past history.</i></p>	<p>Paragraphs 4.21-4.25 of this report discuss the significance of the Priory and its setting and assesses the potential for the proposed development to cause harm. It is concluded that the proposed development would result in less than substantial harm at the lower end of the scale to the Priory and its associated assets.</p> <p>Further discussion regarding the historic field pattern is provided at paragraph 8.2 of this report. The historic field pattern will be retained with no change to field boundaries.</p>

Name of Third Party	Comment/Objection	Response
<p>Local residents standard template objection letter.</p>	<p><i>The developers Archaeologists have provided a report but lack local knowledge. We are all aware of the great importance of the Priory and of the field patterns around Great Wymondley which go back to the Romans. This should not be disturbed it is an important part of our country's history.</i></p>	<p>The HIA (CD56), geophysical survey (CD32), WSI (CD30) and this report have been prepared by experienced archaeologists with an in-depth knowledge of archaeology across the United Kingdom including the area in and around the site. I have previously worked for the Hertfordshire Archaeological Trust on archaeological excavations in the wider local area. The importance of the Priory is clearly acknowledged in the HIA report submitted with the application. The solar farm will be constructed within the pattern of existing field boundaries and thus these will not be disturbed. Further discussion regarding the historic field pattern is provided at paragraph 8.2 of this report. The current field pattern will be retained with no change to field boundaries.</p>
<p>Alison and Stephen Goodrum (local residents)</p>	<p><i>'...disturbing the historic settlements across some of the site'</i></p>	<p>Impacts upon areas of known and likely historic settlement and high archaeological potential within the site have been avoided by the design of the proposed development. A robust archaeological mitigation strategy has been proposed as outlined in Section 4 of this Report and would allow for preservation by record of any hitherto unknown remains relating to historic settlements.</p>
<p>Frances and Stephen Arnold (local residents)</p>	<p><i>The likelihood of this being an area of great archaeological significance is very high given its history, and the disturbance caused by the construction of what is in effect an industrial site</i></p>	<p>The potential archaeological significance of the site is acknowledged and robust mitigation put in place to ensure preservation of archaeological remains</p>

Name of Third Party	Comment/Objection	Response
	<i>would mean that this would be lost to the country for ever.</i>	either in situ or by record as outlined in Section 4 of this Report.
Paul and Jackie Harding (local residents)	<i>The developers archaeologists have provided a report with initial survey that highlighted areas of interest. Such discoveries are not a surprise given the historic importance of the Priory. The history of the Priory and tithe barn can be traced to the Domesday Book. The late medieval barn and the remains of the early thirteenth century priory and fourteenth century hall are of such importance that to undertake any development within the setting is totally unacceptable.</i>	<p>The potential archaeological and historical interest of the site is acknowledged and robust mitigation put in place to ensure preservation of archaeological remains either in situ or by record as outlined in Section 4 of this Report.</p> <p>Paragraphs 4.21-4.25 of this report discuss the significance of the Priory and its setting and assess the potential for the proposed development to cause harm. It is concluded that the proposed development would result in less than substantial harm at the lower end of the scale to the Priory and its associated assets</p>
Diane Kennedy (local resident)	<i>Historical use as farmland for centuries/spoiling setting of the Priory</i>	<p>The historical use of the site for farmland is acknowledged although it is noted that the nature of farming and field boundaries have changed over time leading to amalgamation of fields. This is discussed further in paragraph 8.2 of This report.</p> <p>Paragraphs 4.21-4.25 of this report discuss the significance of the Priory and its setting and assess the potential for the proposed development to cause harm. It is concluded that the proposed development would result in less than substantial harm at the lower end of the scale to the Priory and its associated assets.</p>

Name of Third Party	Comment/Objection	Response
Alison Dyson (local resident)	<i>The open land here was farmed traditionally for hundreds of years. Historically we know the 13th century priors worked the land. Tythes were paid at the Priory Tythe barn which will now be close to the solar panels stretching both side of Graveley Lane. This, spoiling the setting of the beautiful Priory, now used as a wedding venue because of the rural setting, soon to change to 6 foot high wire fencing, 12 foot poles with security cameras, panels by their thousands and industrial battery and transformer housing which will be noisy for residents. The views of the Priory and surrounding fields from Milksey Cottages will have this setting with the straight lines of this metal development changed to an industrial incongruous site.</i>	It is agreed that the land in the site has been farmed for hundreds of years. However current farming methods are not ‘traditional’ and as established in paragraph 8.2 below, the layout of the fields within the site is a 20 th century construct resulting from amalgamation of earlier smaller plots. Paragraphs 4.21-4.25 of this report establish that there are limited views out from Priory precinct although some visibility from surrounding land is acknowledged. It is acknowledged that there would be visibility of the proposed development from the non-designated Milksey Cottages at the eastern edge of Great Wymondley Conservation Area.
Mrs Anne Hope (local resident)	<i>The Priory is also a scheduled monument and as such has great value to the local community and beyond</i>	It is agreed that the Scheduled Monument of Wymondley Priory is of great value as reflected in its national designation. Paragraphs 4.21-4.25 of this report discuss Wymondley Priory and its setting in relation to the proposed development.

8.2 Several comments have been made in relation to the hypothesised Roman date of the field systems at Great Wymondley and within the site and this matter thus requires further discussion and clarification. As evidenced within paragraph 5.3.2 of the HIA (CD5), a Roman settlement and cremation cemetery (Asset 111) was discovered in the 19th century to the north of St Mary’s Church and Wymondley Castle with further extensive Roman remains including pottery, building material, and a ditch (Asset 110) found to the west of the site. As noted by Fitzpatrick-Matthews (CD96, 14-15) analysis undertaken by Frederick Seebhom in the 19th century suggested that the open fields of Great Wymondley were based on ancient Roman measurements and were part of a rectilinear land survey known as a cadastre. Seebhom suggested that a settlement was likely located close to the Roman cemetery and

hypothesised that a field system occupying a plot of 25 iugera (an iugerum was a rectangular plot of land 240 × 120 Roman feet, just over 71m × 35.5m) was located north of Great Wymondley. Fitzpatrick-Matthews argues that Seebhom's plan is not convincing, stating that it follows boundaries that date from the time of post-medieval Enclosure. Fitzpatrick-Matthews presents an alternative area of Roman land holdings or fields systems based on LiDAR data. This presents a larger area of hypothesised landholding extending to land adjacent to the western boundary of the site but not within it. However, Fitzpatrick-Matthews further argues that the hypothesised enclosed Roman settlement was more likely located closer to the medieval castle as Roman law would have required the cemetery to have been located outside of the boundary of the settlement (CD96, 15). Thus, while Roman use of the arable land around Great Wymondley is likely, and indeed prehistoric and later settlement and farming remains extend into the site, there is no readily legible above ground evidence of formal Roman field systems within the site. The current field boundary pattern within the site comprises four large fields. As shown on historic mapping and LiDAR Figures in the HIA (CD5, Figures 6-9) the current layout of the fields are a product of amalgamation in the mid-20th century when numerous former field boundaries were removed to assist with large-scale industrial farming. Thus, while the presence of former historic field patterns around Great Wymondley is acknowledged, it is argued that large arable fields of which the site is comprised are a largely mid to late 20th century construct and thus the proposed development would not result in disturbance to the above ground layout of historic field systems.

8.3 In addition to the Third Party Objections detailed in the table above, it is noted that the NHC Committee Report (CD 35) records 177 comments received on the original submission. The NHC Committee Report identifies a range of themes in relation to objections, three of which are concerned with cultural heritage and are as follows:

- *Impact upon the character of Great Wymondley Conservation Area.*
- *The scale is overly large compared to the village of Great Wymondley with resulting harm to the setting of the Conservation Area.*
- *The site has potential for archaeological remains close to the site of a Roman villa. Digs will be impossible once the land is covered in solar panels.*

8.4 With regard to the comments on both the character and setting of the Great Wymondley Conservation Area, I refer to my assessment presented in paragraphs 4.15-4.20 of this report and reiterate that any harm to the Conservation Area would be less than substantial and at the lower end of the scale.

8.5 With regard to the comment on archaeological potential I refer to paragraphs 4.3-4.7 of this report and the submitted HIA (CD5), geophysical survey report (CD32) and WSI (CD30).

- 8.6 In general, the Third Party objections provide little substance in relation to how identified impacts relate to planning policy and the concept of harm, failing to clearly identify exactly which assets they consider would be affected and not considering the relative contribution made by each asset's current setting to its overall significance. Many of the statements appear to have been made on the basis of generalised or assumed information.
- 8.7 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 within Section 4 of this report.

9 Conclusions

- 9.1 There were no objections to the proposed development on cultural heritage related matters from statutory consultees.
- 9.2 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 (CD30). 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.
- 9.3 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. However, I maintain that there would be no harm to the setting of the Graveley Conservation Area (Asset 266) or Wymondley Hall (Asset 10).
- 9.4 Paragraph 202 of the NPPF (CD56) sets out that where a proposal will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal. This balancing exercise is reserved for decision makers and was carried out by NHC as evidenced in their Committee Report. NHC concluded that great weight should be given to the conservation of designated heritage assets as required by the NPPF but considered that *'greater weight should be attributed to the clear public benefits in this instance and so there is clear and convincing justification for the low harm to the designated heritage assets.'* (CD35a paragraph 4.7.6).