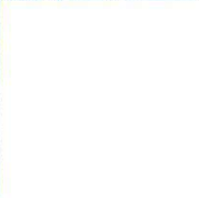
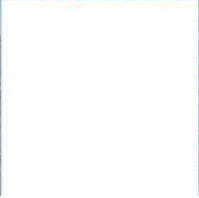


Meerdyke Solar Farm, Norfolk Heritage Impact Assessment

AOC Project Number: 26335

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ARCHAEOLOGY

HERITAGE

CONSERVATION

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1 NON-TECHNICAL SUMMARY

- 1.1 AOC Archaeology Group has been commissioned by Ramboll UK Ltd to undertake a Heritage Impact Assessment (HIA) for a proposed solar farm at Meerdyke, Norfolk. The Site is currently within farmland, formed of two parcels of land either side of Harps Hall Road, to the northwest of the village of Marshland St James in Norfolk.
- 1.2 The Site is formed of two roughly rectangular shaped parcels of land which are separated by Harps Hall Road and, in places, adjacent farmyard complexes. The westernmost parcel of land covers an area measuring c.39.25 hectares whilst the easternmost parcel of land covers an area measuring c.47.54 hectares.
- 1.3 This assessment has established that the Site was predominantly used for agricultural purposes, potentially from as early as the prehistoric period and that this land use has carried through to the modern period, with some evidence for Romano British salt extraction being present. Overall, this assessment judges there to be a Low potential for archaeological remains of prehistoric date due to the relative paucity of heritage assets identified within the study area. This is potentially due to the area being too wet and low lying for anything other than seasonal exploitation rather than permanent settlement. The roddons that are present in the Site are likely to have formed at some point between c.4200-1900 BP. The roddons provided slightly higher and drier routes through the wetlands that became the focus for later settlement and activity within the Study Area. This assessment judges there to be a Medium to High potential for Roman finds and remains, which are most likely to be concentrated upon or in the vicinity of the identified roddons within the Site, especially within the eastern part. The concentrations of Roman briquetage fragments (the ceramic debris from the vessels and hearths used in heating brine that are thought to be evidence for the remains of a Romano-British Saltern) found across the eastern part of the Site also indicates a Medium to High potential for Roman remains associated with the salt working industry. This assessment judges there to be a Medium potential for early medieval and medieval remains within the Site which was likely in mixed pastoral and arable use throughout the period. There is also a potential for features associated with early medieval and medieval salt working within the Site as both Domesday and the HER record evidence for early medieval and medieval salt working (briquetage fragments) within in the Study Area. This assessment judges there to be a High potential for post-medieval and modern remains associated with agricultural activities, with the Site apparently continuing to be in mixed pastoral and arable use throughout these periods (become exclusively arable in the late 20th century) and a Low potential for post-medieval and modern remains of any other type. Map regression indicates that there was significantly more subdivision of the field systems within the Site throughout the 19th and most of the 20th centuries and it is, therefore, likely that these relict field boundaries will survive as buried infilled features.
- 1.4 It should be noted that there appears to have been an absence of opportunities for archaeological investigations within the Study Area (the only previous intrusive investigations within 1km were two watching briefs and a trial trench evaluation) and that the assessment of the archaeological potential of the Site can only be based upon current knowledge and understanding. The potential for previously unrecorded buried remains being present on Site cannot be discounted.
- 1.5 The historic environment team at Norfolk County Council has advised that a program of archaeological evaluation including geophysical survey and trial trenching should be undertaken on the Site in order to inform any further decisions regarding an overall archaeological mitigation strategy. The geophysical survey was undertaken by AOC Archaeology between the 5th of May and 16th of June 2022 with an area of 13ha in the northwestern of the scheme unavailable for survey due to crop concerns, which will be collected and reported on at a later date.
- 1.6 The gradiometer survey has not identified any anomalies or features of a definitive archaeological nature; however, three clusters of linear and discrete anomalies have been identified as being of possible archaeological

interest in the northern part of the survey area, and a group of less clearly understood anomalies exists within the southern part of the survey area, again forming a mixture of linear and discrete groupings of positive anomalies. The survey results are dominated by strong positive curvilinear anomalies with a dendritic pattern indicative of former watercourses, in this case interpreted as a former creek and tidal flat landscape. In the southern part of the survey area, this is disrupted by broad swaths of subdued magnetic background which have been tentatively interpreted as a different phase of the paleoenvironment this time dominated by freshwater channels, which have deposited paleochannel material in these swaths. Historical features such as the debris associated with a former railway line and buildings have been identified within the results and corroborated by historic maps, alongside a network of former field boundaries (likely to have been in the form of open field drains); some of the 'uncertain' anomalies identified in the results are likely to be parts of the same evolving system of drains, but are not depicted on available historic maps and therefore cannot be corroborated (AOC, 2022, iv).

1.7 The setting assessment has found there will be no impact upon the setting of the following assets:

- Grade I Listed Church of All Saints (Asset 5, Listing No. 1171765);
- Grade II Listed Mill House (Asset 1, Listing Number 1305435);
- Marshland Smeeth and Fen War Memorial (Asset 2, Listing Number 1444678);
- cross base 3m south of the Church of All Saints, (Asset 3, Listing Number 1077673);
- memorial 3m south of the Chancel of the Church of All Saints (Asset 4, Listing Number 1077674);
- memorial to James and Susanna Gibson 10m south of the Nave of the Church Of All Saints (Asset 6, Listing Number 1171816);
- Old Post Office (Asset 7, Listing Number 1171829);
- Banyer Hall (Asset 9, Listing Number 1305587);
- Austin House (Asset 10, Listing Number 1342385),
- memorial 10m south of the Nave of the Church Of All Saints (Asset 11, Listing Number 1342385), or
- Walsoken Parish War Memorial (Asset 12, Listing Number 1413185).

Consequently, no harm to these assets is predicted, and the policy tests as set out in National Planning Policy Framework (NPPF) are not invoked.

1.8 The impact upon the setting of the Grade II Listed Trinity Hall (Asset 8, Listing Number 1264136) has been judged to be, at worst, Low. Where Low impacts are predicted the harm to the asset is considered to be less than substantial. As such the harm requires to be weighed against the public benefits of the proposal in line with Paragraph 202 of the NPPF.

2 INTRODUCTION

2.1 Proposed Development Site

- 2.1.1 AOC Archaeology Group has been commissioned by Ramboll UK Ltd to undertake a HIA for a proposed solar farm at Meerdyke, Norfolk. The Site is formed of two roughly rectangular shaped parcels of land which are separated by Harps Hall Road and, in places, adjacent farmyard complexes. These parcels will be referred to throughout this assessment as the western part of the Site and the eastern part of the Site (Plates 1 and 2).
- 2.1.2 The western part of the Site is comprised of four arable fields which cover a total area of c.39.25 hectares. They are bound on their southeastern side by paddocks and plots that front on to Harps Hall Road, on their southwestern side by a large drainage ditch and Cow Lake Drove, on their northwestern side by a large drainage ditch and Meerdyke Lane and on their northeastern side by drainage ditches and further arable and pastoral farmland. The four arable fields which form the western part of the Site will be referred to as Field 1, Field 2, Field 3 and Field 4 throughout this assessment and are depicted and annotated on Plate 1.
- 2.1.3 The eastern part of the Site is comprised of two large arable fields which cover a total area of c.47.54 hectares. They are bound on their northwestern side by paddocks and plots that front on to Harps Hall Road, on their northeastern side by drainage ditches and further arable land, on their southeastern side by a farm access track and small plantation and on their southwestern side by drainage ditches, Long Lot Drove and plantations. The two arable fields which form the eastern part of the Site will be referred to as Field 5 and Field 6 throughout this assessment and annotated on Plate 2.
- 2.1.4 The proposed solar farm, associated infrastructure and access roads as well as the proposed grid connection route (all elements of the layout are yet to be determined) will together be referred to as the 'Proposed Development'.

2.2 Topographical & Geological Conditions

- 2.2.1 According to the British Geological Survey GeoIndex (BGS 2022), the majority of the Site is underlain by solid geological mudstone, siltstone and sandstone of the West Walton Formation, Ampthill Clay Formation and Kimmeridge Clay Formation, sedimentary bedrocks formed 151 to 161 million years ago in the Jurassic Period in a local environment previously dominated by shallow seas. The superficial deposits are recorded as clay, silt and sand alluvium which formed up to 2 million years ago in the Quaternary Period in a local environment previously dominated by rivers (BGS, 2022).
- 2.2.2 The BGS records that the nearest borehole to the Site, located c.460m to the north, was sunk as part of an investigation at Gaersfield Farm in 1997 (BGS Id: 507588 : BGS Reference: TF51SW79). This borehole recorded a made ground of dark brown silty clay with occasional brick rubble down to a depth of 0.5m below ground level (bgl), a greyish/orangish brown silty clay down to a depth of 4.5m bgl, a greyish brown wet clayey silt down to a depth of 12.5m bgl and a greyish brown wet silty sand down to the boreholes maximum depth of 15m bgl.
- 2.2.3 The Site occupies relatively flat low lying topography at approximately 2m AOD.

2.3 Development proposal

2.3.1 AOC Archaeology Group has been commissioned by Ramboll UK Ltd to undertake a HIA for a proposed solar farm at Meerdyke, Norfolk. The Site covers an area of c.87ha and the proposal comprises the construction and operation of a solar photovoltaic ('PV') farm and associated infrastructure, including inverters, transformers, substations, fencing, access tracks and landscaping. There is also an intention to enhance the existing hedgerows to increase the degree of screening that they provide. Taken together these works will be referred to as the 'Proposed Development'.

2.4 Government and local planning policies and guidance

Legislative Framework

2.4.1 Parliamentary legislation for Listed Buildings is provided by the Planning (Listed Building and Conservation Areas) Act 1990 (Act of Parliament, 1990) and legislation for Scheduled Monuments and other buried archaeological remains is provided by the Ancient Monuments and Archaeological Areas Act 1979 (Act of Parliament, 1979).

National Planning Policy Framework (NPPF)

2.4.2 The revised NPPF was published by the Ministry of Housing Communities and Local Government (MHCLG) on 24th July 2018 and updated on the 20th of July 2021. The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for development can be produced and assessed. Chapter 16 of the document is concerned with 'Conserving and enhancing the historic environment'. It identifies heritage assets as '*an irreplaceable resource*' and notes that they '*should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.*' (MHCLG, 2021, Para 189).

2.4.3 Where designated assets are concerned great weight should be given to the asset's conservation. The more important the asset the greater the weight should be. Any harm to or loss of significance that is predicted to result from either a direct impact upon a designated heritage asset or a change to its setting should require '*clear and convincing justification. Substantial harm to or loss of:*

- *grade II listed buildings, or grade II registered parks or gardens, should be exceptional.'*
- *assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional* (MHCLG, 2021, Para 200).

2.4.4 With regard to proposals that are predicted to lead to substantial harm to or the total loss of significance to a designated asset, Paragraph 201 states that '*local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss*' (MHCLG 2021, Para 201). Where '*a development proposal will lead to less than substantial harm to the significance of a designated asset*' Paragraph 202 states that '*this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*' (MHCLG, 2021, Para 202).

2.4.5 NPPF (MHCLG 2021: Glossary) defines the setting of a heritage asset as the: "*surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral*".

2.4.6 Impacts upon non-designated heritage assets are also a pertinent planning consideration; Paragraph 203 states that *'In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'* (MHCLG, 2021, Paragraph 203).

2.4.7 Where a heritage asset is to be lost, either in part or in whole, as a result of the development, the local planning authority should require developers to *'record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.'* (MCHCLG, 2021, Historic Environment section updated July 2019, Paragraph 205).

Planning Practice Guidance (2014; historic environment section updated 2019)

2.4.8 Planning Practice Guidance (PPG) was published in April 2014. PPG was updated on the 24th of June 2021, though the section on the Historic Environment was last updated on the 23rd of July 2019, to expand upon the NPPF. Section 18a of the guidance is concerned with *'...enhancing and conserving the historic environment'*. The Guidance notes that *'conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in everyday use and as yet undiscovered, undesignated buried remains of archaeological interest.'*

'Paragraph: 002 Reference ID: 18a-002-20190723' (MHCLG, 2021, Historic Environment section updated July 2019).

2.4.9 When considering whether a proposal would cause substantial harm to a designated asset the Practice Guidance observes that:

'Substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.'

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings' significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting.'

'Paragraph: 001 Reference ID: 18a-018-20190723' (MHCLG, 2021, Historic Environment section updated July 2019)

Local Planning Policy

2.4.10 The Site lies within the administrative area of the Borough Council of King's Lynn & West Norfolk. The King's Lynn & West Norfolk Borough Council Local Development Framework contains the following documents and policies that are relevant to this assessment.

2.4.11 Chapter 7.5 of the King's Lynn & West Norfolk Borough Council Local Development Framework – Core Strategy (adopted July 2011) is concerned with environmental assets. Sections of Policy CS12, below, are concerned with the historic environment.

“Policy CS12 Environmental Assets: Green Infrastructure, Historic Environment, Landscape Character, Biodiversity and Geodiversity

Proposals to protect and enhance our historic environment and landscape character, biodiversity and geodiversity will be encouraged and supported. The Borough Council will work with partners to ensure an integrated network of green infrastructure throughout the urban and rural areas (identified through the Green Infrastructure Management Plan and Econet map) is successfully created and managed to:

- meet the environmental, social and economic needs of local communities and the wider borough;*
- create a high quality environment for biodiversity and geodiversity to flourish;*
- provide opportunities for species to adapt to the impacts of climate change;*
- contribute to an improved quality of life for current and future residents and visitors;*
- areas identified as being deficient in multi-functional green space will be targeted;*
- the incorporation of Sustainable Drainage Systems with new development will also be promoted to encourage new habitats.*

The historic and built environment play a crucial role in delivering environmental quality and well-being. Therefore the Council will preserve and where appropriate enhance its qualities and characteristics.

The Council and its partners will support a range of initiatives, including Biodiversity Action Plans and proposals that will improve areas of poor quality lacking in biodiversity and geodiversity as well as maintaining, enhancing and linking areas of good quality.

The Council will protect and enhance County Wildlife Sites, ancient woodlands, Biodiversity Action Plan Species and Habitats, Regionally Important Geological Sites and designated sites of historical value from development which damages their interest or significance unless the need for, and public benefits of the development outweigh the loss of interest or significance.

Development should seek to avoid, mitigate or compensate for any adverse impacts on biodiversity, geodiversity and heritage as well as seeking to enhance sites through the creation of features of new biodiversity, geodiversity and heritage interest. The design of new development should be sensitive to the surrounding area, and not detract from the inherent quality of the environment.

The Council will require development proposals to be accompanied by an ecological impact study and assessment proportionate to the degree of the impact and importance of the species affected.

It may be necessary to secure biodiversity, geodiversity and heritage needs through planning conditions and/or obligations. This can include timing of work, Section 106 Agreements, pre-application negotiations, conditions, mitigation and compensation measures.

New built development will be restricted within 1,500m of the Breckland SPA. Development will be restricted to the re-use of existing buildings or where existing development completely masks the new proposal from the Breckland SPA. Beyond the SPA, a 1,500m buffer will also be applied to areas where the qualifying features are known to exist, or where nesting attempts have been made. In this area, development may be acceptable where suitable alternative habitat (outside the SPA) can be secured.

Character Assessment

Proposals for development will be informed by and seek opportunities to reinforce the distinctive character areas and potential habitat creation areas identified in the King's Lynn and West Norfolk Landscape Character Assessment, the West Norfolk Econet Map and other character assessments.

Development proposals should demonstrate that their location, scale, design and materials will protect, conserve and, where possible, enhance the special qualities and local distinctiveness of the area (including its historical, biodiversity and cultural character), gaps between settlements, landscape setting, distinctive settlement character, landscape features and ecological networks (King's Lynn & West Norfolk Borough Council, 2011, 53-54).

2.4.13 Chapter 16 of the of the King's Lynn & West Norfolk Borough Council Site Allocations and Development Management Policies Plan (adopted September 2016) is concerned with Environment, Design and Amenity. Sections of Policy DM15, below, are concerned with the historic environment.

Policy DM 15 – Environment, Design and Amenity

Development must protect and enhance the amenity of the wider environment including its heritage and cultural value. Proposals will be assessed against their impact on neighbouring uses and their occupants as well as the amenity of any future occupiers of the proposed development. Proposals will be assessed against a number of factors including:

- *Heritage impact;*
- *Overlooking, overbearing, overshadowing;*
- *Noise;*
- *Odour;*
- *Air quality;*
- *Light pollution;*
- *Contamination;*
- *Water quality and*
- *Visual impact.*

The scale, height, massing, materials and layout of a development should respond sensitively and sympathetically to the local setting and pattern of adjacent streets including spaces between buildings through high quality design and use of materials.

Development that has a significant adverse impact on the amenity of others or which is of a poor design will be refused.

Development proposals should demonstrate that safe access can be provided, and adequate parking facilities are available (King's Lynn & West Norfolk Borough Council, 2016, 55).

Historic England Guidance