



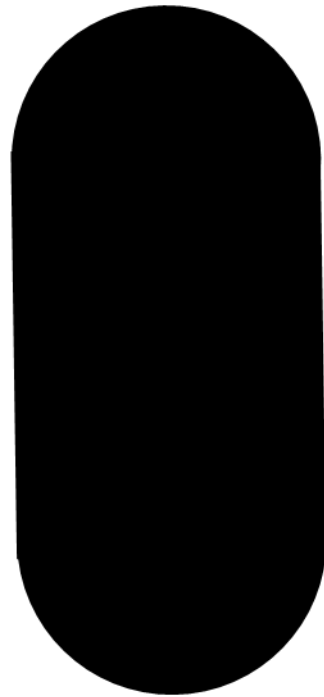
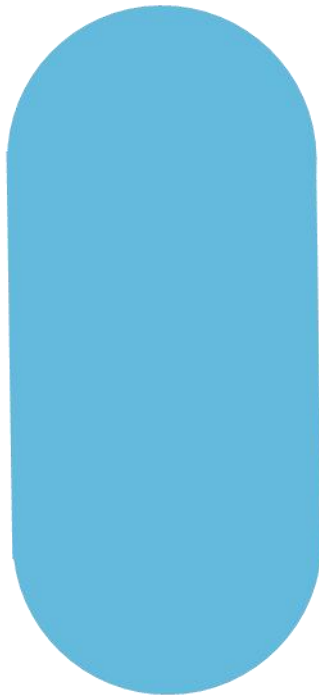
 Part of Shakespeare Martineau

## STOP LIME DOWN

## HERITAGE AND ARCHAEOLOGY REPSONSE

902832.6

April 2026





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# 1 INTRODUCTION

## PROJECT BACKGROUND

- 1.1 This report has been prepared by Marrons on behalf of Stop Lime Down ('SLD'), an action group representing communities in Wiltshire and Gloucestershire. Lime Down Solar Park Limited ('the Applicant') submitted an application for a Development Consent Order ('DCO') to the Planning Inspectorate on 19th September 2025.
- 1.2 Marrons have been appointed to critically assess the built heritage and archaeological elements of the application made by the Applicant for the scheme at Lime Down Solar Park ('the Scheme') and to provide further assessment as required of the Scheme's impact on built heritage and archaeology. This report has been prepared by Lucy Nicholson LLB (Hons), MA, Pg Cert, MRTPI, IHBC (who has focussed on built heritage) and Tom Linnington, BA (Hons), MCiFA (who has focussed on archaeology).
- 1.3 The evidence which we have prepared and provided is true and has been prepared, as is given, in accordance with the guidance of our professional institutions, and we confirm that the opinions expressed are our own, true and professional opinions, irrespective of by whom we are instructed.
- 1.4 In preparation for this report, we have taken a proportionate review of the Applicant's submission (with the key documents referred to laid out below). This report has been prepared to identify areas of assessment omitted in the Applicant's submission and to provide a proportionate assessment in their absence. As a result, this report (where appropriate) relies on the baseline work prepared by the Applicant with further research only carried out where considered necessary (for example in relation to Bradfield Manor). This report follows the methodology used by the Applicant to allow for a direct comparison where a change in resulting effect is found.
- 1.5 The Scheme comprises of a solar photovoltaic ('PV') electricity generating station of over 50 megawatts ('MW') covering the 1,237 ha of land along with the associated development comprising Battery Energy Storage System ('BESS') with an export capacity of approximately 500 MW, substations, grid connection infrastructure, and other infrastructure integral to the construction, operation and maintenance, and decommissioning phases.
- 1.6 The Scheme is classed as a Nationally Significant Infrastructure Project ('NSIP') for the purposes of the Planning Act 2008 (as amended) and therefore is required to proceed by way of an application for a Development Consent Order ('DCO'). This report has been prepared to inform the process.
- 1.7 In the preparation of this report, we have reviewed all of the relevant submitted documents, with a focus on the following documents and their supporting appendices:
  - I. EN010168-000599-6.1 Chapter 12 Cultural Heritage [APP-064]
  - II. EN010168-000646-6.3 Appendix 12-1 Heritage Statement [APP-219]
  - III. EN010168-000647-6.3 Appendix 12-2a Archaeological Desk Based Assessment Solar PV Sites [APP-220]

- IV. EN010168-000648-6.3 Appendix 12-2b Archaeological Desk Based Assessment Cable Route Corridor [APP-221]
  - V. EN010168-000657-6.3 Appendix 12-6 Outline Archaeological Mitigation Strategy [APP-230]
  - VI. EN010168-000659-6.3 Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]
  - VII. EN010168-000792-6.2 Figure 12-1 Designated and Non-Designated Heritage Assets Scoped in for Assessment [APP-143]
  - VIII. Environmental Statement Volume 2, Figure 12-2 Archaeological Assets [App-144]
  - IX. Environmental Statement Volume 2, Figure 12-3 Historic Landscape Character [APP-145]
  - X. EN010168-000655-6.3 Appendix 12-5 Interim Evaluation Trial Trenching Reports Parts 1-5 [APP-225] to [APP-229]
  - XI. EN010168 Environmental Statement Volume 3, Appendix 12-4a: Archaeological Geophysical Survey Report - Solar PV Sites [APP-223]
- 1.8 A site visit was also undertaken by Lucy Nicholson, accompanied by members of SLD, in December 2025.

## THE SITE

### LOCATION

- 1.9 The Order Limits comprise a total area of 1,237 ha of land located largely within the administrative area of Wiltshire Council, with two small areas of existing highway within the administrative area of South Gloucestershire Council. The Order Limits are made up of the Solar PV Sites, the Cable Route Corridor, the Existing National Grid Melksham Substation and the Highway Improvement Areas.

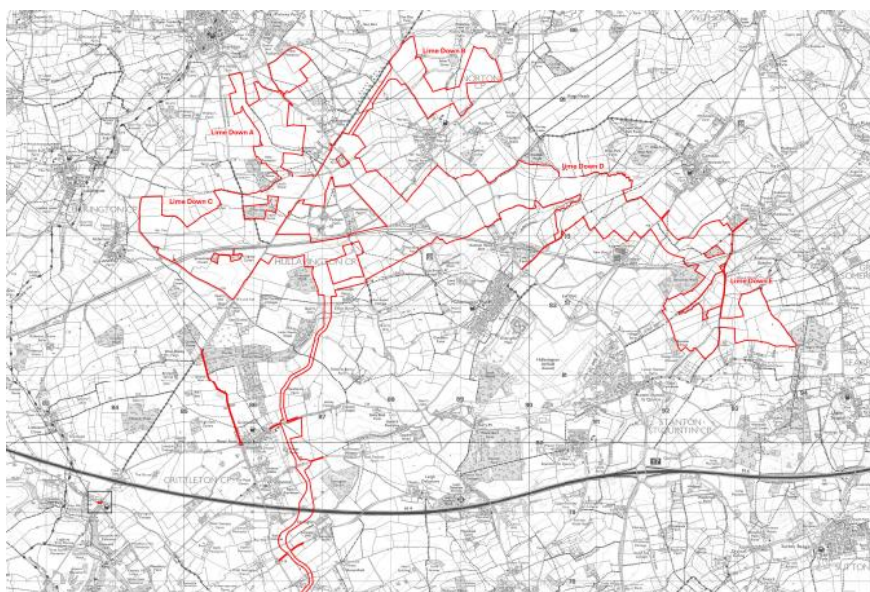


Figure 1- Excerpt of the Order Limits (not showing extent of the southern cable route)



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## PLANNING CONTEXT

### LEGISLATION AND NATIONAL POLICY

- 1.10 The Planning Act 2008 (as amended) ('PA 2008') is the principal legislation governing the Examination of an application for an NSIP and the decision as to whether to grant Development Consent.
- 1.11 The Scheme falls within the definition and thresholds of an NSIP under Section 14(1)(a) and 15(2) of the Planning Act 2008 comprising an onshore generating station in England exceeding 50MW generating capacity. Under Section 115(1)(b) of the Planning Act 2008, the Scheme also includes elements considered to be 'associated development', such as the BESS.
- 1.12 Under the Planning Act 2008 regime, the framework for determining planning applications for development consent is provided by National Policy Statements ('NPS'). Section 5 of the Planning Act 2008 allows the Secretary of State ('SoS') to designate NPSs which set out national policy in relation to the types of NSIP listed in Section 14 of the Planning Act 2008.
- 1.13 The relevant legislation is set out in APP- 064 and has been referred to in the preparation of this report.

### National Policy Statements

- 1.14 The relevant NPSs to be considered for determination of the DCO Application in accordance with Section 104(2) of the PA 2008 are:
- NPS EN-1: Overarching National Policy Statement for Energy (January 2024);
  - NPS EN-3: National Policy Statement for Renewable Energy Infrastructure (January 2024); and
  - NPS EN-5: National Policy Statement for Electricity Networks Infrastructure (January 2024).

#### *NPS EN-1: Overarching National Policy Statement for Energy (January 2024)*

- 1.15 NPS EN-1 sets out the overarching national policy for the submission and assessment of applications relating to energy infrastructure. The document covers government policy on the need for NSIPs, how applications for energy infrastructure will be assessed and the way in which impacts and mitigations will be judged.
- 1.16 Applicants are required to assess likely significant heritage impacts as part of the ES, including an application of the mitigation hierarchy and consideration of possible impacts, including cumulative, on the wider historic environment.
- 1.17 NPS EN-1 provides further details of what the Applicant should assess at paragraphs 5.9.9 to 5.9.21.



- 1.18 In decision making, the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development (either directly or through an effect on its setting), taking into account the relevant information in the application and the other information sources set out in paragraph 5.9.22.
- 1.19 When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance.
- 1.20 The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.
- 1.21 Substantial harm to or loss of significance of a Grade II Listed Building or a Grade II Registered Park or Garden should be exceptional.
- 1.22 Substantial harm to or loss of significance of assets of the highest significance, including 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.
- 1.23 Where a proposed development will lead to substantial harm to or loss of significance of a designated heritage asset, the Secretary of State should refuse consent unless the tests set out in paragraph 5.9.31 can be met (for instance, that the harm is outweighed by the substantial public benefits of the development).
- 1.24 For non-designated heritage assets, a balanced judgment will be required, having regard to the scale of harm or loss and the significance of the heritage asset.
- 1.25 When considering applications for development affecting the setting of a designated heritage asset, the Secretary of State should give appropriate weight to the desirability of preserving the setting of such assets and treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the Secretary of State should give great weight to any negative effects, when weighing them against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval.

### *NPS EN-3: National Policy Statement for Renewable Energy Infrastructure*

- 1.26 NPS EN-3 provides the technology-specific policy to be considered by the Secretary of State alongside NPS EN-1 when determining applications for renewable energy NSIPs, including solar PV infrastructure. It covers themes such as factors influencing site selection and design, technical considerations for solar PV infrastructure, and particular impacts usually associated with solar sites in terms of ecology, landscape, glint and glare, heritage, construction, agricultural land and decommissioning.



- 1.27 Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the applicant should submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 1.28 Applicants should take account of the results of historic environment assessments in their design proposal.
- 1.29 Applicants should consider what steps can be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting.

*NPS EN-5: National Policy Statement for Electricity Networks Infrastructure*

- 1.30 This policy is also applicable to the Scheme, albeit the focus is on the above two policy documents.

**National Planning Policy Framework**

- 1.31 There is national policy and guidance relating to the protection and treatment of the historic environment within the planning process. These identify the historic environment as a non-renewable, fragile, and finite resource and place priority upon its conservation. This includes the setting out of appropriate assessments to ensure damage or loss to the resource is permitted only where it is justified.
- 1.32 The National Planning Policy Framework (NPPF), published in 2012 and last updated in 2025, sets out the UK Government's requirements for the protection and enhancement of the historic environment, and should be read in conjunction with the accompanying Planning Policy Guidance (PPG). The other aspects of national policy relevant to this assessment are detailed in Appendix 2.

*Local Planning Policy*

- 1.33 The Scheme lies across two county councils; Wiltshire Council and South Gloucestershire Council. Local planning authorities are responsible for implementing the requirements articulated by legislation and the NPPF as regards the protection of the historic environment on a local level, and the formulation of policies to support this obligation. The relevant policies pertaining to the Site are set out within APP-064 and has been referred to in the preparation of this report.



## 2 THE SCHEME

- 2.1 The Site is comprised of a total area of 1,237ha of land, located predominantly within the administrative area of Wiltshire Council with two small areas extending into the administrative boundary of South Gloucestershire Council.
- 2.2 The application is for a DCO for the contribution, operation (including maintenance) and decommissioning of a ground mounted PV panel array and associated development comprising of the BESS, substations, grid connection infrastructure and other infrastructure integral to the construction, operation and maintenance and decommissioning phases of the Scheme.
- 2.3 The Applicant has divided the wider land holding and scheme into five land parcels which are referred as Lime Down A, B, C, D and E. In addition to these areas is the Cable Route Corridor which extends approximately 22km from Lime Down D and connects the Solar PV site with the National Grid at the existing substation in Melksham.

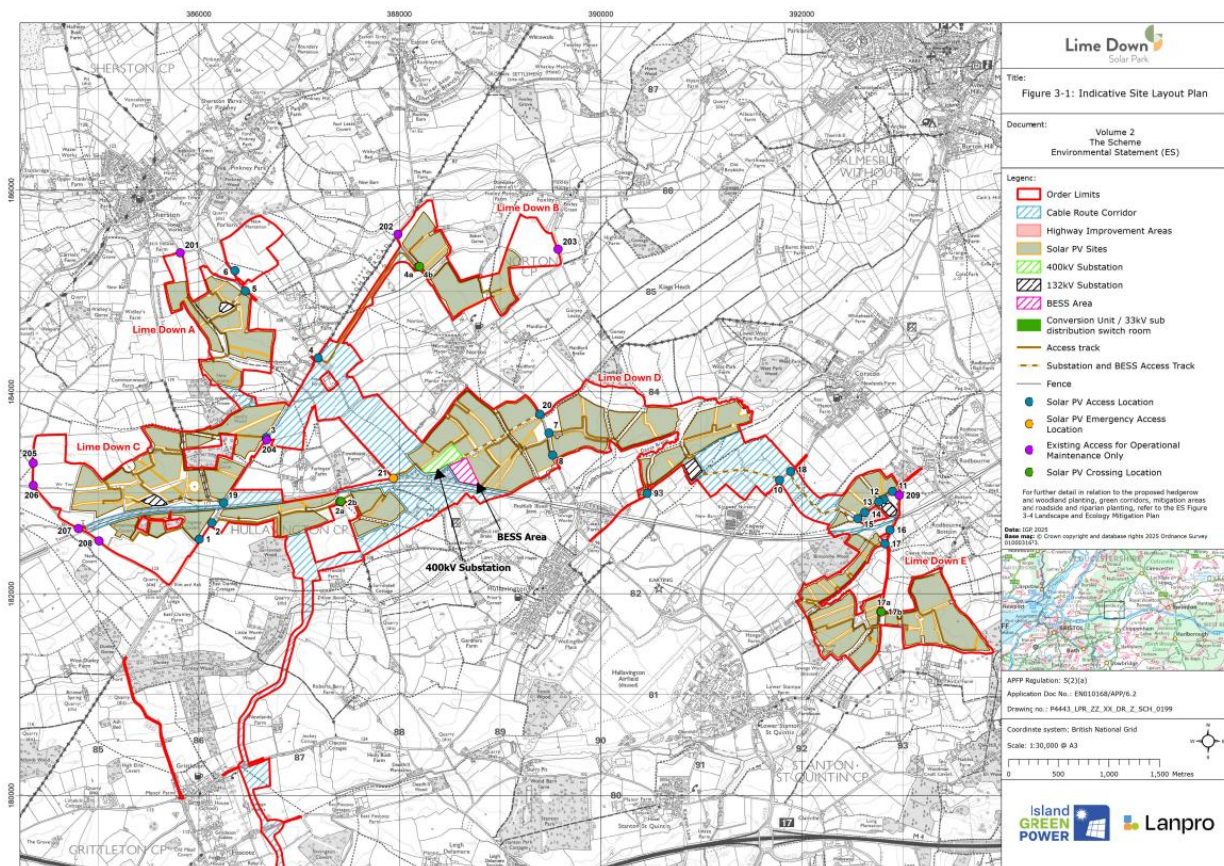


Figure 2 - Whole Scheme Plan



## Lime Down A

- 2.4 The area of the Site referred to as Lime Down A is located to the north of the Order Limits and incorporates the areas around Lordswood Farm and the Fosse Way.
- 2.5 The built heritage constraints of Lime Down A include the Grade II farm at Widley's Farm to the east of the panel and the Sherston Conservation Area to the north of the panel area.
- 2.6 Archaeological constraints of Lime Down A include potential Prehistoric and Roman settlement sites identified through geophysical survey [APP-223] and trial trenching [APP-225] to [APP-229]. We consider that the Applicant has failed to adequately assess the impact of the scheme on the relationship between possible Romano-British settlement sites and the Fosse Way, as well as the impact of landscape and ecology planting on buried remains within this works area.

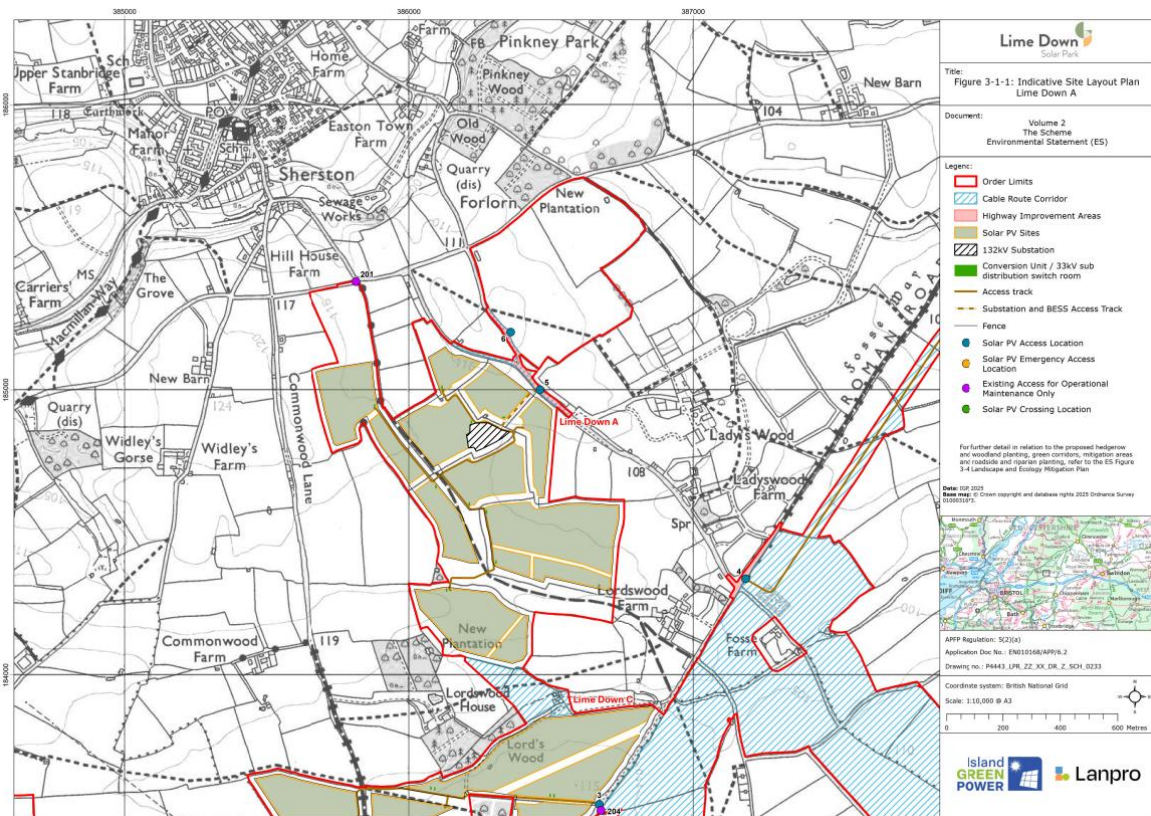


Figure 3 - Lime Down A



## Lime Down B

- 2.7 The area referred to as Lime Down B comprises of the area surrounding the hamlet of Norton. Lime Down B comprises of solar panels and includes part of the cable route corridor which would surround Fosse Farm. The solar panels would border the northeastern edge of the hamlet of Norton as well as appear in the views looking south.
- 2.8 The heritage constraints within this area include the cluster of 11 Listed Buildings within Norton, as well as Foxley Manor, the Grade I Parish Church and Scheduled Monuments at Foxley to the north of solar panels. We consider the impact of the noise generated by the BESS on the asset group at Norton in Section 3 below.
- 2.9 Archaeological constraints of Lime Down B include potential Prehistoric and Roman settlement sites identified through geophysical survey [APP-223] and trial trenching [APP-225 – App-229]. We consider that the Applicant has failed to adequately assess the impact of the scheme on the relationship between possible Romano-British settlement sites and the Fosse Way, as well as the impact of landscape and ecology planting on buried remains within this works area.

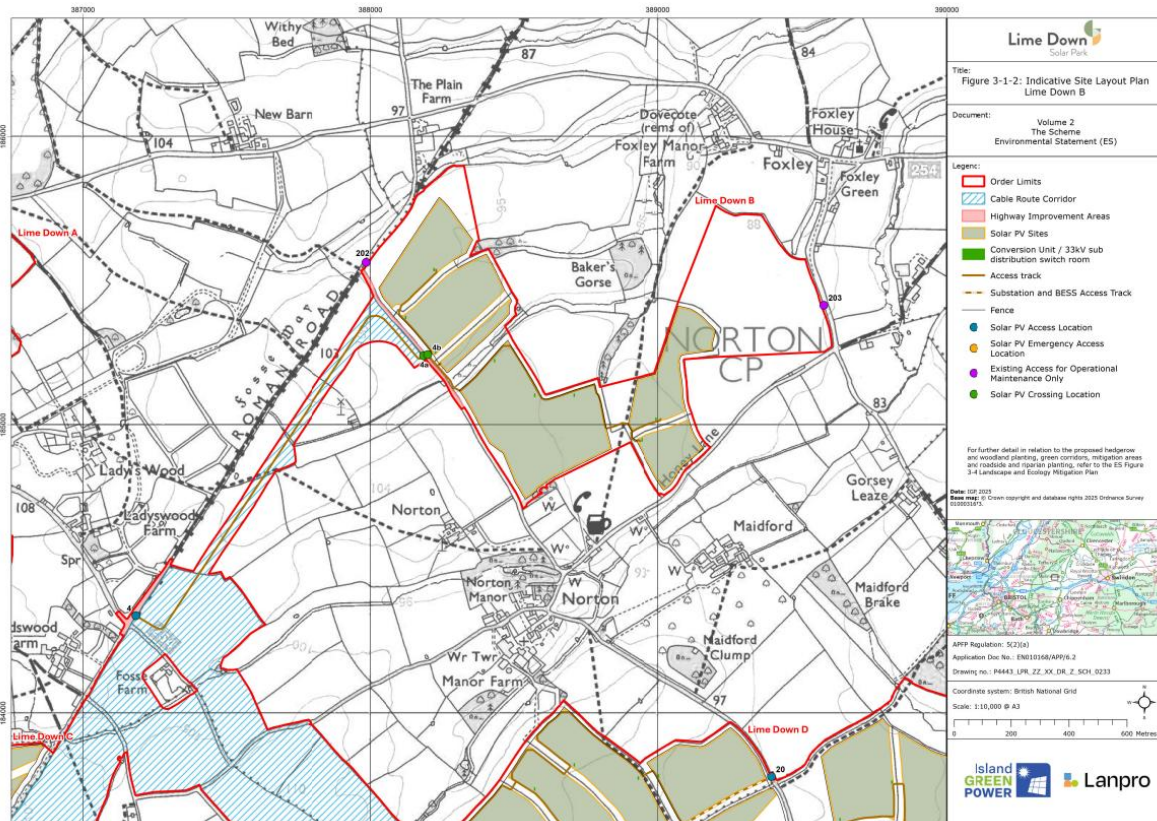


Figure 4 - Lime Down B



### Lime Down C

- 2.10 The area referred to as Lime Down C is located around Farleaze, with the cable route to the northeast corner of this area. Lime Down C is located in and around the hamlet of Hullavington.
- 2.11 The built heritage constraints in this area include the Grade II Listed asset of Farleaze Farm. Whilst the location of the panels has been placed at a distance from the asset, the proximity of the cable route steps into the close setting of the asset. The hamlet of Alderton is to the west of Lime Down C and the impact of the increase in vehicular movements is considered in Section 3.
- 2.12 Archaeological constraints of Lime Down C include potential Roman settlement sites identified through geophysical survey [APP-223] and trial trenching [APP-225] to APP-229], which share a close association with the Fosse Way Roman Road, a nationally significant (although not scheduled) Roman routeway which passes through the centre of the works area, which could be of equivalent significance to a Scheduled Monument and thus, in line with paragraph 5.9.8 of EN-1, subject to the policies for designated heritage assets, as discussed in paragraph 3.6 – 3.9. of this report. We consider that the Applicant has failed to adequately assess the impact of the scheme on the relationship between possible Romano-British settlement sites and the Fosse Way, as well as the impact of landscape and ecology planting on buried remains within this works area.

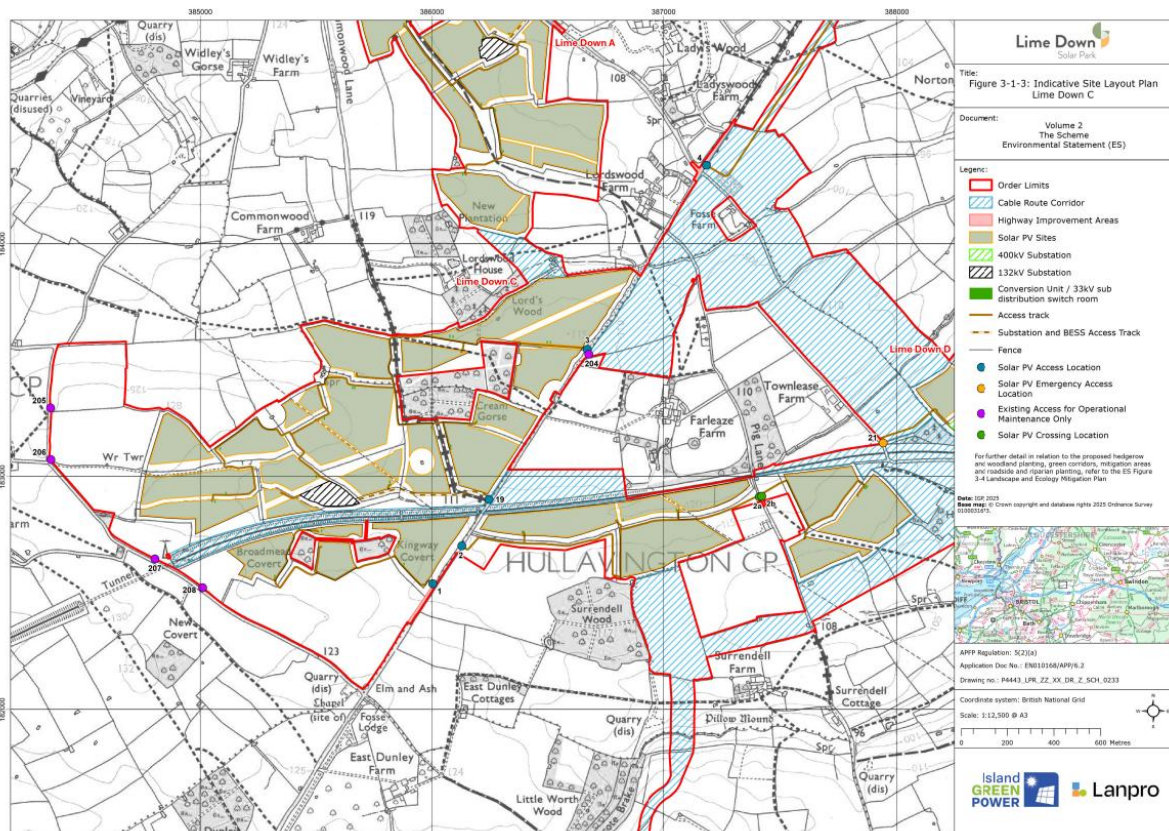


Figure 5 - Lime Down C



## Lime Down D

- 2.13 The area referred to as Lime Down D is located in the south of the Order Limits. Lime Down D also includes the BESS, which is located to the west of Bradfield Manor positioned adjacent the railway line.
- 2.14 The heritage constraints in this area include the Grade I Bradfield Manor and three Grade II Barns associated with Bradfield Manor. The impact to the Bradfield Manor group is discussed in detail in Section 3 of this report as it is considered that the Applicant has not provided sufficient evidence or analysis to support their conclusion of a low level of less than substantial harm (not significant in EIA terms) to the Grade I asset.
- 2.15 Archaeological constraints of Lime Down D include potential Prehistoric and Roman settlement sites identified through geophysical survey [APP-223] and trial trenching [APP-225 – App-229]. We consider that the Applicant has failed to adequately assess the impact of the scheme on the relationship between possible Romano-British settlement sites and the Fosse Way, as well as the impact of landscape and ecology planting on buried remains within this works area.

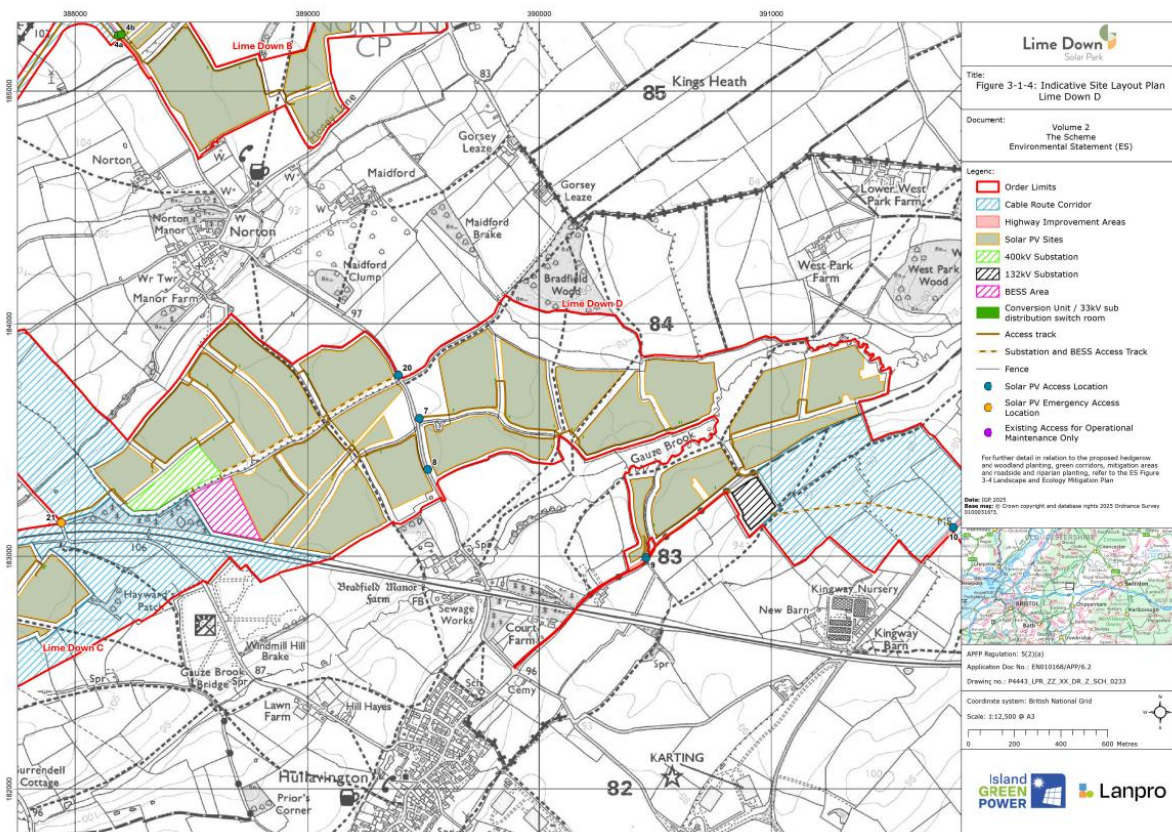


Figure 6 - Lime Down D



## Lime Down E

- 2.16 The area referred to as Lime Down E is located in the south of the Order Limits and is located in proximity to the hamlets of Rodbourne and Rodbourne Bottom. The area includes panels and cable route.
- 2.17 The heritage constraints for this area include the Conservation Area at Rodbourne, the development would step panels into the open countryside which surrounds the Conservation Area. The impact of the increase of vehicular movements on the tranquillity of Rodbourne Conservation Area is considered in Section 3 below. Avil's Farmhouse (Grade II) is seen to the south of Lime Down E. The impact of the noise from the solar arrays is also considered in Section 3.
- 2.18 Archaeological constraints of Lime Down E include potential Prehistoric and Roman settlement sites identified through geophysical survey [APP-223] and trial trenching [APP-225] to [APP-229]. We consider that the Applicant has failed to adequately assess the impact of the scheme on the relationship between possible Romano-British settlement sites and the Fosse Way, as well as the impact of landscape and ecology planting on buried remains within this works area.

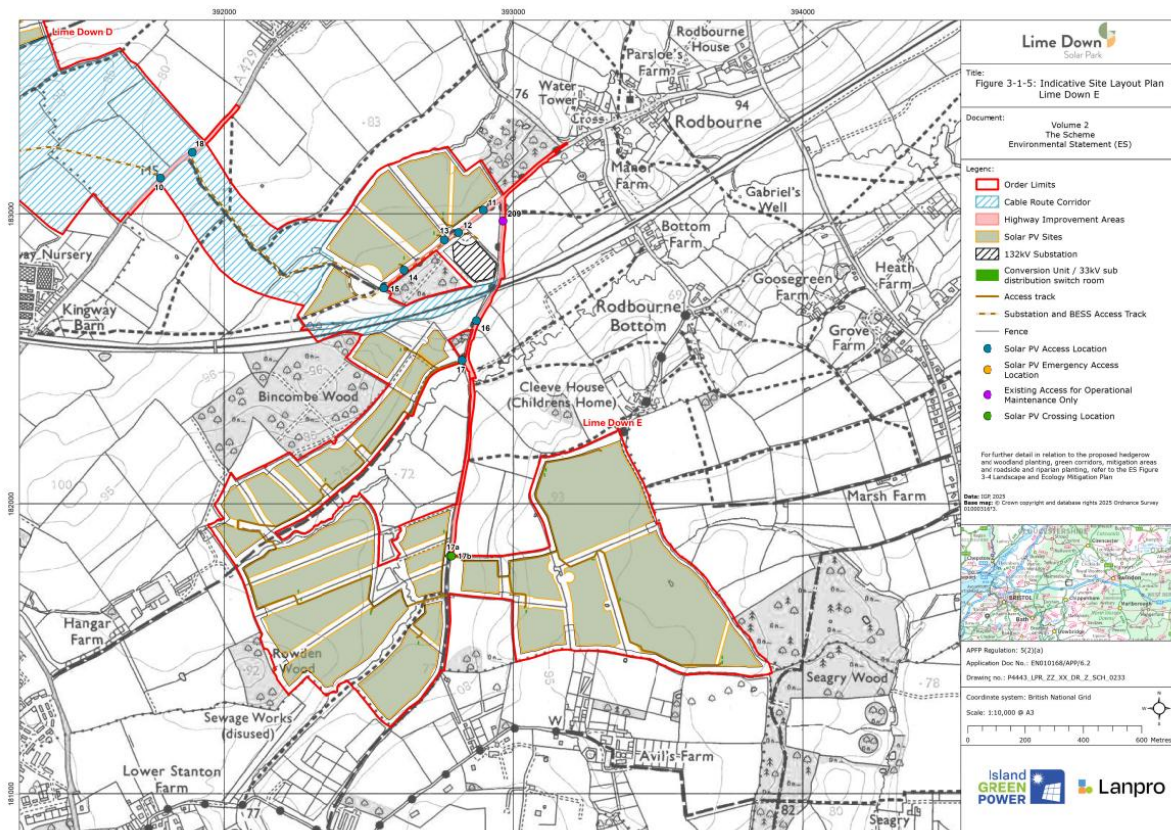


Figure 7 - Lime Down E



## 3 HERITAGE ASSESSMENT

### SCOPE OF ASSESSMENT

- 3.1 As set out in the introduction, in preparation for this report, we have taken a proportionate review of the Applicant's assessment. This review has been focused upon the identified areas of assessment omitted in the Applicant's submission and this report seeks to provide a proportionate assessment in their absence. As a result, this report (where appropriate) relies on the baseline work prepared by the Applicant with further research only carried out where considered necessary (for example in relation to Bradfield Manor). This report follows the methodology used by the Applicant to allow for a direct comparison where a change in resulting effect is found.
- 3.2 In our relevant representations, we critiqued the scoping carried out by the Applicant. Whilst we do not consider the level of detail provided sufficient to support the level of scoping undertaken, we do not seek to readdress the scoping undertaken due to the volume of assets and the limited scope of this report. This report has been prepared to focus on the key elements of impact on the built heritage and archaeological assets in line with the requirements of policy EN-3 and EN-1. As such, we have focussed our review and assessment on the following pertinent points.
- 3.3 First, in relation to archaeology, we consider that the following points have not been adequately addressed in the submission:
- Heritage significance of the Roman Fosse Way and its relationship with contemporary settlement sites and the impact thereupon by the Solar PV;
  - Inconsistency in impact assessment regarding areas of 'non-intrusive construction methodology';
  - The lack of appropriate impact assessment of proposed intrusive landscape and ecological mitigation;
  - The lack of appropriate briefing arrangements ahead of archaeological works to non-archaeological personnel; and
  - The appropriateness of horizontal directional drilling ('HDD') in proximity to scheduled monument 1018610 (Pillow mound 280m south west of Surrendell Farm).
- 3.4 Secondly, in relation to built heritage we identify omissions in the Applicant's submission regarding the assessment of Bradfield Manor. To ensure the impacts are fully considered, we present a full assessment of the contribution of the Site to the significance of the Grade I Bradfield Manor and associated assets.
- 3.5 Thirdly, we have also identified that the Applicant has omitted to consider the impact of the additional traffic and noise impacts on the setting of several assets. We provide a proportionate review of the assets which are anticipated to be affected, these are the group at Alderton, the group at Norton, Avil's Farm and Rodbourne Conservation Area.



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## DIRECT IMPACTS

### ARCHAEOLOGY

- 3.6 Building works, groundworks, associated landscaping and access routes are the main source of impacts from a proposed development on the archaeological resource. Such works can cause direct impacts through the removal or truncation of any below-ground archaeological deposits that may exist within the Site.

#### Relationship of Romano-British settlement sites and the Fosse Way Roman Road

- 3.7 Whilst the Fosse Way is not designated as a Scheduled Monument by the Secretary of State, its significance as a primary route way during the Romano-British period cannot be overstated and archaeological remains of the road could be considered to be non-designated heritage of national significance. The Fosse Way, being one of the principal Roman routeways, holds a high degree of historic interest, as the network of roads established by the Romans constitutes a major feat of engineering and is seen as one of the most distinctive legacies of the Roman occupation of Britain. Their metalled roads were not emulated on any scale until after the Middle Ages, and their influence upon the development of the present-day national road network remains clearly discernible. The applicant has assigned the Fosse Way a Heritage Sensitivity Rating of Low; it is considered that due to the routeways national importance it should in fact be assigned a Heritage sensitivity of **High**. Furthermore, the archaeological remains of the Fosse Way should not be viewed in isolation, but rather within a wider landscape context alongside contemporary archaeological remains, such as settlement sites.
- 3.8 The geophysical survey and subsequent program of trial trench evaluation has identified a number of potential settlement sites of Iron Age/Romano-British date within the Solar PV Areas.
- 3.9 Whilst the introduction of non-intrusive construction techniques within these areas is welcomed, as it will preserve these identified remains in-situ, the areas of preservation are very tightly drawn around identified focuses of activity. As such, the areas of non-intrusive construction techniques will not preserve remains extending beyond these areas and the introduction of large-scale solar PV infrastructure will interrupt the current relationship these sites enjoy with the alignment of the Fosse Way. The applicant has assigned the above Magnitude of Impact as Neutral, which in line with Table 12-4 of EN010168-000599-6.1 Chapter 12 Cultural Heritage [APP-064], would only be applicable if there was no change for the baseline condition. We dispute this, based on the loss of archaeological remains beyond the limits of non-intrusive construction techniques and the visual disruption caused by the introduction of the solar panels, both of which would harm the ability to appreciate the historical and functional relationship between the Fosse Way and associated archaeological remains. As such, it is considered the Magnitude of Impact on the Fosse Way would in fact be **Low**.
- 3.10 Based on the above, it is clear that the introduction of the solar panels within the proximity of the Fosse Way, the associated loss of visual relationship between the Fosse Way and surrounding contemporary archaeological sites, as well as the loss of



archaeological remains through the construction process would result in a **Moderate** Effect Level of Significance in Line with Table 12-5 of EN010168-000599-6.1 Chapter 12 Cultural Heritage [APP-064]. Which is a significant adverse effect.

### **Inconsistency in impact assessment regarding areas of “non-intrusive construction methodology”**

- 3.11 The Environmental Statement Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [APP-232] has a degree of inconsistency regarding areas of “non-intrusive construction methodology”.
- 3.12 There is a lack of discussion on the suitability of areas selected for non-intrusive construction methodologies, whether areas qualify for the use concrete feet or piles. While it is accepted the use of piles can minimise the construction impacts, they do not entirely eliminate the impact on below ground archaeological remains. As such the use of piles as a non-intrusive construction methodology is considered to reflect the residual adverse effects that such a methodology can produce.

### **The lack of appropriate impact assessment of proposed intrusive landscape and ecological mitigation**

- 3.13 We wish to highlight the lack of appropriate assessment of potential impacts on buried archaeological remains present within areas selected for intrusive landscape and ecological mitigation.
- 3.14 The northern element of Lime Down A, Lime Down B and the eastern element of Lime Down C (among others), while subject to geophysical survey were not further evaluated through trial trenching.
- 3.15 Long term intrusive planting in order to secure ecology and landscape mitigation has the potential to impact as of yet unidentified archaeological remains, through both the initial planting process as well as extensive root action, as identified in the Forest Research paper *Trees and Forestry on Archaeological sites in the UK: A review document* (2004).
- 3.16 No detailed assessment of impact or adequate mitigation measures have been undertaken by the applicant within the areas defined as Works No 9 within document EN010168 Environmental Statement Volume 1, Chapter 3: The Scheme [APP-055] and illustrated on EN010168 Works Plan [App-007].

### **The lack of appropriate briefing arrangements ahead of archaeological works to non-archaeological personnel**

- 3.17 We wish to echo’s Historic England’s (‘HE’s’) concern [RR-1880] regarding the lack of provision for briefing of non-archaeological personnel ahead of works within the close proximity of archaeological remains, and specifically around high significance remains, such as the Scheduled Monument (NHLE: 1018610).
- 3.18 We are in agreement with HE that this could be resolved through an amendment to the OCEMP.

### **Proposed use of strip map and sample excavation**



- 3.19 Within the Cultural Heritage Chapter of the Environmental Statement [APP-064], the Cultural Heritage Impact Assessment Tables [APP-232], and the Outline Archaeological Mitigation Strategy [APP-230], the Applicant has proposed to employ strip, map and record excavation (also referred to as strip, map, and record – these terms are treated as interchangeable) ('SMS') on a total of five areas within the Solar PV Sites and 19 areas within the Cable Route Corridor.
- 3.20 As part of the Assessment of Effects within the Environmental Statement [APP-064] and associated Cultural Heritage Impact Assessment Tables [APP-232], the Applicant has concluded that strip, map and record excavation reduces the magnitude of effect to negligible – no matter the magnitude of impact prior to the employment of SMS (see Receptors C13-01 (high magnitude of effect prior to mitigation), F46-01 (medium magnitude of effect prior to mitigation), and O48-01 (low magnitude of effect prior to mitigation) as examples). This suggests the applicant considers the employment of SMS substantially eliminates harm, through the preservation by record. Marrons consider this a methodological flaw, as preservation by record, through its nature mitigates harm, it does not eliminate it to that extent.
- 3.21 Once it is recognised that SMS does not reduce the magnitude of impact to Negligible (which is assumed to be the basis upon which effects in the Tables following SMS are reported), but rather **Low**, it will be recognised that the residual effects cannot properly be characterised as Negligible. Rather, for D24-01 the residual effect will be **Moderate** (a significant adverse effect), and for other Receptors (e.g.) C13-01 and C29-01 will be **Moderate/Minor**.

### The appropriateness of horizontal directional drilling

- 3.22 Within the Cultural Heritage Chapter of the Environmental Statement [APP-064], the Cultural Heritage Impact Assessment Tables [APP-232], and the Outline Archaeological Mitigation Strategy [APP-230], the Applicant has proposed the use of HDD in order to prevent impacting highly sensitive archaeological remains within the cable route corridor. Marrons are concerned that at this stage it has not been established whether HDD is feasible in this location and the required depth of the drilling in order to not impact nationally significant remains, such as beneath mitigation area F120 of the Cable Route, the location of the Scheduled Monument '*Pillow mound 280m southwest of Surrendell Farm*' (NHLE: 1018610).
- 3.23 In the event of trenchless cabling techniques, such as HDD, not being a viable option in this location, the proposed solution by the Applicant is to undertake a program of strip, map and sample excavation along within Mitigation Area F120, as identified in the Outline Archaeological Mitigation Strategy [APP-230] (Figure 8).
- 3.24 The employment of SMS to mitigate the impact of the scheme on this nationally significant archaeological asset is not considered to be appropriate. Excavation, through its nature is a destructive process, the harm of which, as noted above, is mitigated through the preservation by record.
- 3.25 It is considered by Marrons that in the event of SMS is employed within the mitigation area F120, the residual effect on the Scheduled Monument '*Pillow mound 280m southwest of Surrendell Farm*' (NHLE: 1018610), should be reassessed, as it will not be Neutral, as concluded by the applicant in Cultural Heritage Impact Assessment



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Tables [APP-232]. Applying the approach to SMS set out above, and recognising that a reasonable worst case is such HDD failing, the residual effect of SMS on this Receptor would be **Moderate** (a significant adverse effect).



## INDIRECT IMPACTS

3.26 We agree with the Applicant that there would be no adverse direct impacts to built heritage assets as a result of the Scheme. However, following our review of the submission documentation and our own site visit and historic research we have identified the following elements where our findings differ to the Applicant. In summary, we consider that the assessment, as submitted, is insufficient in regard to the following issues:

- Lack of adequate assessment in relation to the contribution of the Site to the setting of Bradfield Manor and associated listed buildings and omission of consideration of the impact of the increase of noise on the assets;
- Omission of the consideration of the impact of the increase of traffic to the group of assets at Alderton and Rodbourne Conservation Area; and
- Omission of the consideration of the impact of noise on the asset group at Norton and Advil's Farmhouse.

### BRADFIELD MANOR GROUP

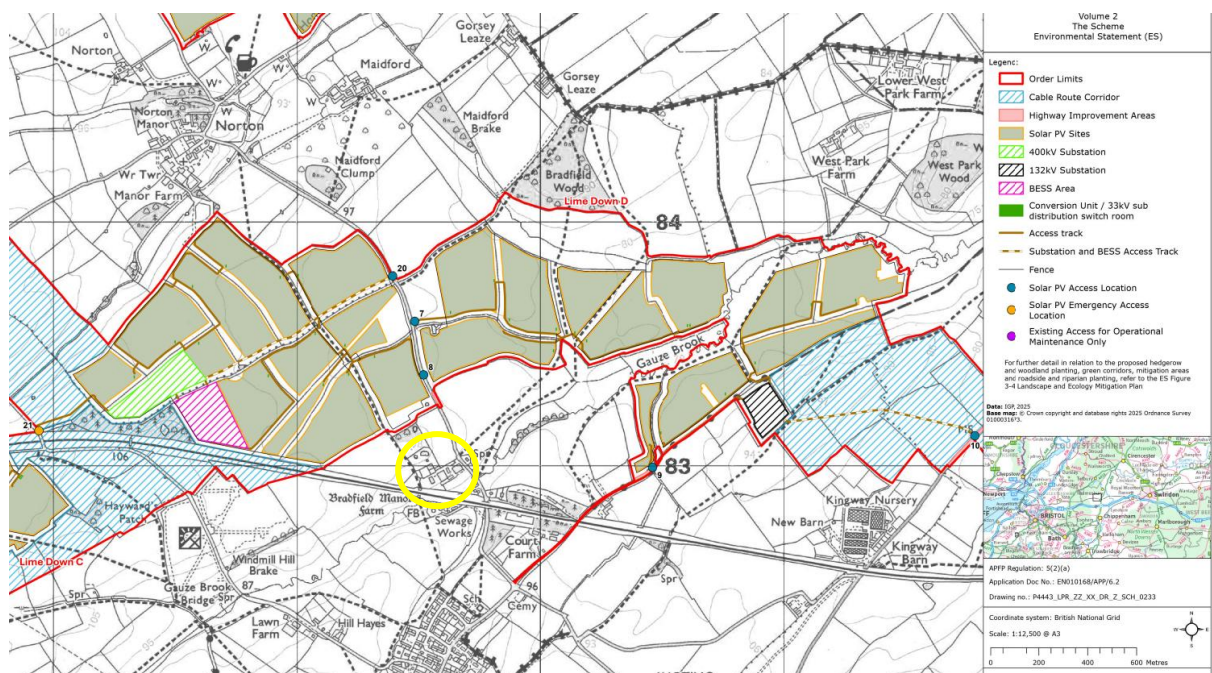


Figure 8 - Lime Down D, Bradfield Manor highlight in yellow

3.27 The Bradfield Manor Group comprises of the Grade I Bradfield Manor Farmhouse (NHLE: 198808), Barn in Courtyard to the South East of Bradfield Manor Farmhouse (Grade II, NHLE: 1023202), Barn to the South West of Bradfield Manor Farmhouse (Grade II, NHLE: 1198869) and Barn to East of Bradfield Manor Farmhouse (Grade II, NHLE: 1356036).

3.28 These assets are located within the area referred to as Lime Down D, which includes solar panels, cable corridor route and the BESS. The submitted Heritage Statement sets out a brief historical background to Bradfield Manor at 5.11.4 to 5.11.13. We agree with this historic background.



- 3.29 The high national significance of Bradfield Manor Farmhouse as a Grade I asset, combined with the proposed proximity (180m) of the solar panels as well as the noise implications of the proximity of the BESS, means the impact on this asset and the wider group must be carefully considered in the examination.
- 3.30 We focus here on the Grade I Bradfield Manor Farmhouse due to its high grading and open northern aspect, however where the same nature of impact is expected in relation to the three surrounding Grade II assets we signpost this and provide an updated resulting effect at the end of this section.
- 3.31 We note that Historic England in their relevant representation submission have asked again for visualisations showing the Scheme from within Bradfield Manor<sup>1</sup>. These visualisations were requested to be submitted with the application to help inform the impact on the significance of the Grade I asset. These visualisations have not been provided as part of the application and are still awaited. These visualisations are requested to be submitted to help better understand the impact on the significance of the highly designated heritage asset and to provide a greater degree of certainty to the effectiveness of the proposed mitigation measures in terms of planting.
- 3.32 We query the level of detail provided to support the understanding of the applicant of the Grade I Manor in their assessment. The NPPF states that the information provided must be sufficient to allow the LPA (or in this case the examiners) to understand the potential impacts of a scheme. This is reiterated in GPA 3 (para 2) which states; *“the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or invest need to be proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets. At the same time those taking decisions need enough information to understand the issues.”*
- 3.33 GPA 3 goes onto states that *“Consideration of the contribution of setting to the significance of heritage assets, and how it can enable that significance to be appreciated, will almost always include the consideration of views.”*. Therefore, the lack of any visual material relating to Bradfield Manor is a crucial missing piece in being able to fully assess the impacts of the Scheme on the nationally significant asset.
- 3.34 The setting analysis presented by the Applicant in the Heritage Statement simply states *“Bradfield Manor has a historic relationship with much of the land within Lime Down D”*. The Applicant omits to provide any analysis of the contribution this historic relationship makes to the significance of the Grade I asset.
- 3.35 The Applicant concludes less than substantial harm at the lower end of the scale. However, it is considered this conclusion is unsupported without the necessary setting contribution analysis (provided by a full setting analysis of the Manor, its connection with the Site and the requested visual) and, as such, the Applicant’s conclusion cannot be relied upon.

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<sup>1</sup> As requested by Historic England in their scoping opinion consultation response (2024), as well as in the relevant representations made by Historic England [RR-1880].



- 3.36 We have undertaken an assessment of the contribution of the setting, and the Site, to the significance of Bradfield Manor Farmhouse in line with the staged approach set out in GPA 3. In conclusion, we assess the impact of the introduction of the BESS into the western part of the asset's setting and the panels to the north of the asset.

### Setting Assessment

- 3.37 We agree with the Applicant that Bradfield Manor Farmhouse is an asset of the highest significance and that the Medieval Hall's significance is in part derived from its architectural interest and historical interest. We also agree that there is group value from the association with the three listed buildings within the wider farm complex (Barn in Courtyard to the South East of Bradfield Manor Farmhouse (Grade II, NHLE: 1023202), Barn to the South West of Bradfield Manor Farmhouse (Grade II, NHLE: 1198869) and Barn to East of Bradfield Manor Farmhouse (Grade II, NHLE: 1356036)).

- 3.38 The Applicant's Heritage Statement provides the following text relating to the immediate setting of Bradfield Manor:

*"The asset is accessed from a tree-line drive leading west from Bradfield Cottages, with the former medieval Hall situated at the end of the drive. The building forms the northernmost structure within the farmstead, with walled grounds extending south and west of the building. The Grade II Listed Barn in Courtyard to the South East of Bradfield Manor Farmhouse (NHLE 1023202) forms the eastern extent of these walled grounds, which include a courtyard immediately to the south of the Farmhouse, and tree-lined lawns and a tennis court to the west. The walls surrounding the tennis court are further externally bounded on their western and northern extents by a large hedge."* (Table 16 of the Heritage Statement [APP-219])

- 3.39 Whilst we agree with the above and the brief assessment given of the wider setting of the Hall in the proceeding paragraphs of table 16, the Applicant's setting assessment relating to Bradfield Manor does not sufficiently assess the contribution of the Site to the significance of the Manor. The consideration given to this is very limited, simply stated as *"Bradfield Manor has a historic relationship with much of the land within Lime Down D."* (Table 16 of the Heritage Statement [APP-219]). Without understanding the contribution of the Site to the setting and significance of the assets, the conclusions the Applicant derives of the impact of the Scheme on the asset group are unconsidered.

- 3.40 Our assessment considers that the Site contributes to the understanding of the asset group in four direct ways;

- through the historic functional relationship;
- through the existing agrarian landscape;
- through the appearance of the Site within the designed views from the Parlor of the Manor (specifically to the Grade I Manor); and
- through the experience of the tranquil, rural setting.

- 3.41 We take each of these elements in turn below.

### *Historic Functional Relationship*

- 3.42 A historic functional relationship between the Site and the Manor is understood from a study of the Tithe maps (produced in 1837). The Applicant correctly reports that at this time 425 acres were held by the Hooper family, who owned Bradfield Manor (recorded by the Applicant at 5.11.11 of the Heritage Statement [APP-219]). The Tithe mapping shows that historically Bradfield Manor was surrounded by land owned by the Hooper family. This spatial and tenure relationship is important to consider when assessing the contribution of the Site to the significance of the Bradfield Manor group as the arrangement provides an understanding of the historic value of the Bradfield Manor. The Tithe maps show an economical and spatial connection between the Site and the Manor group; the Manor would have acted as the administrative centre to the estate, the fields providing the economic basis for the estate. The estate is shown to stretch to the north, to and including Bradfield Woods. The continued use of the Site as agricultural land within the setting of the asset supports the understanding of this historic connection and forms a key part of the setting of the Manor today.
- 3.43 The public right of ways ('PROWs') also provide evidence of the routes traversed across the farmland, used by farmworkers and those travelling between Bradfield and the surrounding countryside. The map from 1888 shows a clear footpath between Bradfield farm (as the manor was referred to at the time) and Bradfield Woods to the north.



Figure 9 - 1888 OS Map

### *Agrarian Landscape*

- 3.44 In addition to this historic functional relationship between Manor and land, the Site in its current form as open agricultural land also directly contributes to the wider understanding of the Manor as a rural manor and the associated barns as historic barns used for agricultural purposes. The rural character of the Site directly contributes



to the understanding of Bradfield Manor as a high-status farmhouse. The tithe mapping apportionments confirm that much of the land owned and tenanted by the Manor was used as pasture and arable. Indeed, the historic field boundaries as reported on the tithe apportionments survive today, particularly to the north of the asset (and north of the railway line) in the area within the Site's red line boundary.

- 3.45 The Site forms a large portion of this important part of the asset's setting and in its current form as open agricultural land, provides far reaching, open views across to Bradfield Woods in the north (part of the same historic relationship) as well as towards Norton.



Figure 10 - Extensive views from the grounds of Bradfield Manor

### Views

- 3.46 The wide-reaching rural views afforded from the Manor (both inside the house and within the grounds) provide a sense of rurality which underpins the understanding of the Manor as a rural Farmhouse (see figure 10 below).
- 3.47 Turning to the designed views from the Manor across the Site. The Applicant identifies that the three storey Parlour to the Manor appears to have been designed to “*to provide views of the surrounding landscape*”. This designed element of the Parlour presents a third aspect in which the Site contributes to the significance of the Manor. The Parlour, which forms the northern extension of the Grade I Manor, was designed to allow for the enjoyment of the surrounding agrarian landscape and directly overlooks the Site. The presence of open countryside within this part of the Manor's setting thereby contributes to the understanding of the architectural intent and interest of the Parlour.

### Experience

- 3.48 Not only does the area of the Site provide visual appreciation of the rural setting but is also a quiet and tranquil area. We acknowledge that the existing train line which runs



to the immediate south of the Manor group impacts this tranquillity, though note that the frequency of trains is approximately 4 an hour with effect lasting a few seconds (as opposed to a matter of minutes) and the railway does not affect underlying background  $L_{A90}$  noise levels, or general rural ambient soundscape, particularly at night-time. The low-levels of background and ambient noise currently enjoyed by the Manor also contribute to the understanding of the Manor group as a rural farm group.

### *Summary of Contribution of Site to Setting*

- 3.49 Therefore, it is the case that the Site in its current form plays an active and important role in the understanding of the key elements of the Manor's significance. This contribution has been identified to arise from four key aspects; the proven historical functional relationship, the wider agrarian setting and contribution to the understanding of the rural farmhouse, the designed views from the Manor across the Site and the tranquil setting.
- 3.50 The Site also plays an active role within the wider setting of the three listed barns associated with the Manor. We acknowledge the barns have a more enclosed setting however, the Site does form a large part of the rural backdrop from which the understanding for the barns as rural historic barns is derived. The tranquil setting of these barns also contributes to the understanding of their significance as rural farm barns

### **Impact**

- 3.51 The scheme would introduce solar panels and the BESS into the setting of the Grade I Manor and associated Grade II assets. This impact section first considers the impact of the solar panels on the Manor before turning to the impact of the BESS and providing a conclusion on the level harm to be attributed to the asset.
- 3.52 We agree with the Applicant and Historic England that the removal of panels from the southernmost fields of the Scheme helps to reduce the resulting level of harm, however, as set out above, given the lack of detailed setting analysis given, the Applicant's finding of less than substantial harm at the lower end of the spectrum is considered unfounded. We also consider the impact assessment to be incomplete due to the lack of consideration of the wider impacts of the Scheme.
- 3.53 The impact of the Scheme on the setting of the Manor is fourfold; first the erosion of the agrarian land with which the Manor has a historic functional relationship with, secondly, the change in character within those identified designed views from the Parlour, third the ability to appreciate the asset within its rural setting. And finally, the noise implications from the BESS and panels. Indeed, it is considered that the four elements of the Site which contribute to the understanding of the significance of the asset are materially impacted as a result of the Scheme. The panels of Lime Down Area D would constitute a wholesale change of the northern setting of the Manor, comprising almost 180 degrees of the asset's setting.
- 3.54 The Scheme would introduce solar panels which stand at 4.5m tall at a distance of circa 180m from the Grade I Manor. The figure below (figure 11) shows the fields which were historically owned and farmed by the Manor alongside the Scheme. The figure demonstrates that whilst the immediate setting of the Manor would retain its existing condition, the area historically owned by the Manor to the north of the Manor group



would be entirely changed. The extent of panels within this part of the Manor’s setting would change such a large portion of the area historically owned by the Manor that the understanding of the historic function of the Manor as an administrative farmhouse at the centre of its land would be eroded when viewed from the northern area (see figure 11 below). Indeed, this would sever the relationship between Bradfield Woods and the Manor and change the character of the historic setting and experience of the Site within the wider context of the Listed Buildings. Therefore, it is considered that as a result of the loss of the understanding of the historical functional relationship, harm would arise to the appreciation of Bradfield Manor as a rural Manor house at the centre of its historic agricultural estate.

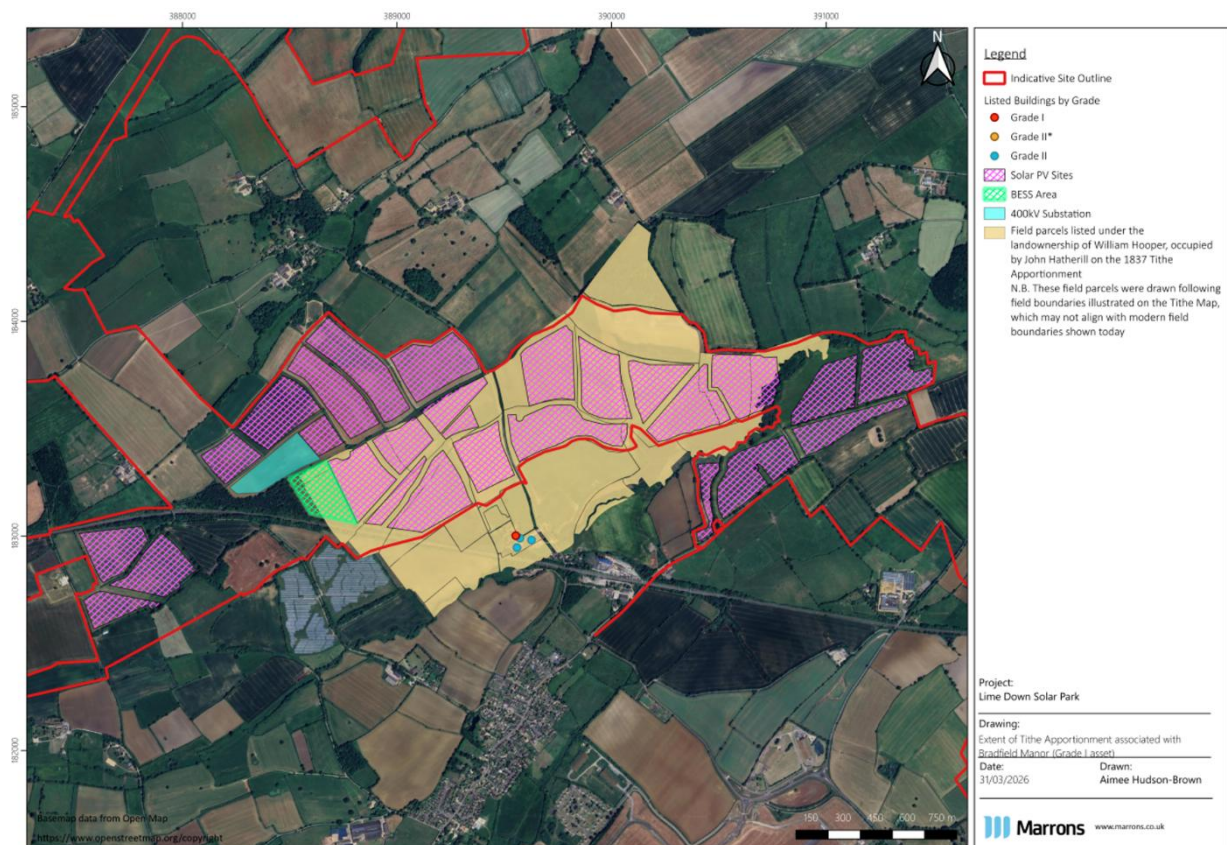


Figure 11 - Figure showing the extent of the Scheme and the portions of land owned by the Manor as reported on the 1837 Tithe map

3.55 The current agrarian character of the Site is a very important part of the Manor’s setting and strongly contributes to the understanding of the Manor group as a rural farm group. Whilst we acknowledge the current proposals do not introduce development into the immediate setting of the Manor and have allowed a buffer, the extent of panels proposed within 180m of the Manor would result in a fundamental change of this part of the asset’s setting from open countryside to a developed character. This is not the case of a singular field within the asset’s setting, but would indeed comprise a change in character in 180 degrees of the asset’s setting from agrarian fields which provide an important contribution to the Grade I asset to a setting with 4.5m high panels. Therefore, it is considered that as a result of the loss of the agrarian landscape within the wider setting of the Grade I asset, that harm would arise to the appreciation of the Manor House.



- 3.56 At the time of writing, we await the visuals from the Applicant which show visibility of the panels from the Manor, though we note that the topography of the fields to the north of the Manor rise in elevation to the north-west and north-east, so that Bradfield Manor gently nestles in the landscape. This topography provides a large amount of visibility of Lime Down Area D within the Manor itself and very good visibility when stood in the formal rear gardens of the Manor. We note that the site visits carried out by the Applicant in preparation of the Heritage Statement were undertaken in March and October and as such there is no consideration of true winter views in their assessment (albeit from the static 1 year winter views used to support the landscape work) where the visibility is much greater. Our site visit (December 2025) confirmed that there would be a great deal of visibility of the panels from within the grounds of Bradfield Manor.
- 3.57 The 3-storey parlour block has been established to have been designed to enjoy the views of the agrarian landscape. The Site forms part of the fields within this view and the scheme would change the character of this view. The introduction of 4.5m panels within this view would amount to a fundamental change of character from agrarian to developed land and remove a further element of the contribution of the Site to the significance of the Grade I asset.
- 3.58 We acknowledge that the Applicant has engaged some mitigation strategies here, some of which have been guided by Historic England. These embedded mitigation strategies are described as a “*panel free buffer zone and removal of panels from sensitive areas*” and “*landscape mitigation proposals*” which would reach maturity at year 15. We agree that the pull back of the panels to 180m from the Manor itself reduces the harm but disagree that this limits the harm to the extent the Applicant suggests.
- 3.59 Lime Down Area D also includes the BESS. Of direct relevance to the impact on the group at Bradfield Manor is the noise generated by the unit. We accept that the tranquillity of the Manor is affected through train movements on the railway line to the south, with these short-term events occurring around 4 times per hour during the daytime. The railway does not affect underlying background  $L_{A90}$  noise levels, or general rural ambient soundscape, particularly at night-time. The BESS will introduce a continuous industrial hum, the level of which is proposed to be considerably above the existing background noise at the Manor. This would further erode the agrarian character of the setting of the Manor and materially alter the tranquillity of the asset.
- 3.60 Therefore, it is considered that the erosion of such a large aspect of the Grade I Bradfield Manor Farmhouse’s and associated assets’ setting would impact the ability to appreciate the Manor within its agrarian landscape and the ability to understand the historic functional relationship with the fields. The Scheme would also substantially erode the views that the Parlour of the Manor which was been specifically designed to enjoy. In addition, the harm arising from the noise of the BESS should also be considered when providing a conclusion on the impact on the Manor. The mitigation strategies employed by the Applicant are noted but not considered to significantly reduce the impact of the scheme on the key element of the Manor’s wider setting.



### Summary of Impact on Bradfield Manor Group

- 3.61 As such it is considered that the magnitude of impact arising from the scheme is **Medium** following Applicant’s own matrix (an increase from the concluded Low by the Applicant in the Heritage Impact Assessment Tables [APP-232]). This is as a result of the change in setting arising from the proposed scheme amounting to a noticeably different change to setting affecting significance, and resulting in the erosion of our ability to understand and appreciate the asset. This arises from the change in character of 180 degrees of the asset’s wider setting, the loss of the appreciation of this land as agricultural land with which the Manor would have had a historic functional relationship, the loss of the agrarian views the parlour was designed to enjoy and the erosion of the tranquil character as a result of the noise of the BESS.
- 3.62 These four key elements which are eroded materially impact the ability to appreciate the Manor as a rural Manor at the centre of its agricultural land holding. The following significance of effects following the Applicant matrix is a **Major/Moderate** effect. This is considered **significant** in EIA terms, but a moderate to high level of less than substantial harm in NPPF/NPS terms.
- 3.63 In relation to the Barn in Courtyard to the South East of Bradfield Manor Farmhouse (Grade II, NHLE: 1023202), Barn to the South West of Bradfield Manor Farmhouse (Grade II, NHLE: 1198869) and Barn to East of Bradfield Manor Farmhouse (Grade II, NHLE: 1356036) it is considered that the magnitude of impact is **Low** (an increase from the concluded Neutral by the Applicant in the Heritage Impact Assessment Tables [APP-232]). This is as a result of the change in character of the Site from open agricultural land which supports the appreciation of the assets as rural barns to developed land and the erosion of the tranquil setting as a result of the BESS.

Receptor	Sensitivity of Receptor	Magnitude of impact (with embedded mitigation)	Residual effect (this mirrors the significant effect as a result of the lack of additional mitigation)
Bradfield Manor (Grade I, NHLE 1198808)	High	Medium; the Scheme would result in a noticeably different change to the setting of the asset and would result in an erosion of our ability to understand the asset as a rural Manor at the centre of its farmland.	Major/Moderate Adverse (significant effect)
Barn in Courtyard to the South East of Bradfield Manor Farmhouse (Grade II, NHLE: 1023202)	Medium	Low; the Scheme would result in a slight change to the setting of this asset which would result in a change in our ability to understand and appreciate the asset.	Moderate/Minor Adverse



<p>Barn to the South West of Bradfield Manor Farmhouse (Grade II, NHLE: 1198869)</p>	<p>Medium</p>	<p>Low; the Scheme would result in a slight change to the setting of this asset which would result in a change in our ability to understand and appreciate the asset.</p>	<p>Moderate/Minor Adverse</p>
<p>Barn to East of Bradfield Manor Farmhouse (Grade II, NHLE: 1356036)</p>	<p>Medium</p>	<p>Low; the Scheme would result in a slight change to the setting of this asset which would result in a change in our ability to understand and appreciate the asset.</p>	<p>Moderate/Minor Adverse</p>



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## ALDERTON GROUP

- 3.64 The group of assets at Alderton consists of the Church of St Giles (Grade II\*), Alderton Conservation Area, Manor Farmhouse (Grade II), and associated assets within the churchyard of the Church. Of particular relevance for this report are the Manor Farmhouse (Grade II), the Church of St Giles (Grade II\*) and the Alderton Conservation Area.
- 3.65 We broadly agree with the baseline given by the Applicant and confirm that the historic development is accurate to the hamlet of Alderton. However, similar to Bradfield Manor, we find that the Applicant's submitted Heritage Statement does not consider the wider aspects of the scheme in their impact assessment.
- 3.66 The Applicant correctly identifies that the Site contributes to the understanding of the rural setting of these assets and does consider the visual impact of the scheme on these assets. We note that through the pre-application process the panels were pulled back from the fields close to Alderton which has reduced the visibility impact of the scheme, however the augmented ZTV (APP-098) demonstrates that there will still be a degree of visibility from large areas of the Conservation Area, including the Churchyard of St Giles (Grade II\*) and the Manor Farmhouse (Grade II). The Scheme would be seen from several different areas of these assets setting and given the high number of glimpsed views, it is considered that the wider appreciation of the assets within the agrarian landscape would be impacted as a result.
- 3.67 The Applicant's assessment also fails to consider the impact of the increase of traffic associated with the access point at Alderton and the impact of this on the tranquil character of the setting. We suggest that the location of the access to the Scheme being located within close proximity to these assets would cause an adverse impact to the tranquillity and understanding of the agrarian setting.
- 3.68 We understand from the transport consultant appointed by Stop Lime Down, that there are 6 HGV movements predicted for Lime Down Area C per day. The Applicant's submission does not provide sufficient detail on the routes to be taken by these vehicles and as such the frequency with which each access point would be used is not known.
- 3.69 This impact is particularly important in relation to the Church of St Giles (Grade II\*). The Scheme layout positions the operational maintenance access at the existing field entrance which is located 140m to the east of the Churchyard boundary. The Applicant omits to consider the impact of this Scheme layout on the contribution of the Site as part of the rural setting to the tranquillity and calm character of the Churchyard. This intangible part of the Church's setting is an important characteristic of the setting of the Church as it contributes to the use of the churchyard as a burial ground and the use of it for an area of calm reflection for parishioners.
- 3.70 The introduction of up to 6 HGV vehicle movements per day within the setting of the Church would interrupt the tranquil setting of the Church and introduce an aspect of industrial character into the setting. These large vehicles would be heard and seen from the immediate setting of the Church and whilst it is acknowledged that the number of vehicles each day may vary, it is considered that the introduction of this level of



vehicle movement of an industrial character would impact the tranquil character of the Church.

- 3.71 The increase in vehicular movement would also impact on the setting of the Manor Farmhouse, which is orientated to the northeast and looks directly towards the edge of the Scheme and the access point. The use of this area for access during operation would introduce a new element of industrial activity into the setting of the farmhouse.
- 3.72 As such it is considered that the conclusion of no harm to the Grade II\* Church, the Conservation Area and the Grade II Manor Farmhouse must be reconsidered. All elements of the asset’s setting should be taken into account when considering impact and the Applicant has failed to properly assess the impact of the increase of traffic and its impact on the tranquillity in the setting of the assets. In addition, the ZTV shows visibility from large portion of the eastern part of the village where the assets are located and this must also be taken into account.

<b>Receptor</b>	<b>Sensitivity of Receptor</b>	<b>Magnitude of impact (with embedded mitigation)</b>	<b>Residual effect (this mirrors the significant effect as a result of the lack of additional mitigation)</b>
Alderton Conservation Area	Medium	Negligible; the Scheme would result in a slight change to the noise levels and the ability to appreciate the asset.	Negligible Adverse
Church of St Giles (Church II* NHLE: 1022367)	High	Negligible; the Scheme would result in a slight change to the noise levels and the ability to appreciate the asset.	Moderate/Minor Adverse
Manor Farmhouse (Grade II, NHLE: 1 363842))	Medium	Negligible; the Scheme would result in a slight change to the noise levels and the ability to appreciate the asset.	Negligible Adverse



## NORTON GROUP AND AVIL'S FARMHOUSE

- 3.73 The submitted Heritage Statement omits to adequately assess the impact of the noise effects of the proposed Scheme on the heritage assets. This has been omitted across the board on assets, however we focus our discussion here on the assets identified as being impacted by operational noise impacts within the noise graphs prepared by the Applicant.<sup>2</sup>
- 3.74 The Applicant at 3.5.15 of the Heritage Statement [APP-219] includes a header referring to noise and vibration impacts, however on further reading the substantive body of text within this section refers only to the vibrations. The Applicant refers to the noise in some assessments in relation to the construction noise (for example in relation to the assessment offered on the Fosse Lodge (Grade II), Table 16 page 56), however no reference is made to the noise impacts at operational stage.
- 3.75 GPA3 confirms that tranquillity and noise (and other pollutants) can form part of the aspects of an asset's setting (GPA3 page 9). The fact that setting extends beyond the visual impacts is a well-established principle; see Palmer, where Lewison LJ stated "*the most obvious way in which the setting of a listed building might be harmed is by encroachment or visual intrusion, it is common ground that, in principle, the setting of a listed building may be harmed by noise or smell*"<sup>3</sup>. Several Appeal decisions and Secretary of State decisions confirm that noise and the impact on tranquillity are key considerations which should be assessed as part of the impact assessments. Indeed, whether or not the proposed noise levels are within the set noise/amenity guidelines of the PPG, the change to noise climate in the vicinity of a heritage asset is accepted as having an effect on the way that heritage asset is understood<sup>4</sup>.
- 3.76 In the following section we present an assessment of impact on the assets which are identified using the Applicant's noise graphs. However, we note that these graphs were prepared by adopting a fixed background noise level for the assessment, and the Applicant does not account for the very low background noise levels which exist. We understand that in reality this means that the effects could be higher than presented for all heritage assets as the noise graphs are based on the fixed background noise as supposed to the actual noise levels. The limitations of the noise assessment are considered in detail by the noise report by Ian McArthur, prepared for SLD, and the findings of this may result in further assessment being carried out in relation to the impact on the setting of the assets through noise.
- 3.77 Therefore, below we assess the impact on the following assets:
- The group of assets at Norton;
  - Bradfield Manor (as dealt with above); and
  - Avil's Farm (south of Lime Down E).

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<sup>2</sup> Though note the shortcomings of these as identified by the noise consultant appointed by Stop Lime Down.

<sup>3</sup> *R (on the application of Palmer) v Herefordshire Council* [2016] EWCA Civ 1061 at [5].

<sup>4</sup> E.g. appeal reference: APP/X2600/W/24/3356489. The Inspector here concluded that the increased noise and reduction in tranquillity would be harmful to the setting of the Church of St Mary (a Grade I church).



3.78 In preparation for this report, we understand from Ian MacArthur that the noise impacts at Norton and Bradfield are above the Lowest Observed Adverse Effect Level ('LOAEL') and approaching the Significant Observed Adverse Effect Level ('SOAEL'). The Applicant only proposes mitigation to prevent exceeding the SOAEL which contravenes the government noise mitigation hierarchy table. This hierarchy table states that noise at the LOAEL should be mitigated against and minimised, and noise at the SOAEL should be avoided. This is discussed in more detail in the noise report.

<b>Norton Group</b>			
<i>Overview of effect:</i>			
<p>Norton currently experiences very low background noise levels during the daytime and night-time periods, characterised by the absence of industrial noise sources<sup>5</sup>. The predicted noise levels from the BESS container area would be clearly distinguishable and perceptible within Norton as a continuous industrial sound.</p> <p>In preparing this report, we have reviewed the noise contours at APP-160 and APP-161 which report that the impacts at Norton would increase the background noise level to only just below the SOAEL threshold. This means they fall at the upper end of the LOAEL which is considered loud enough for the noise impact to be mitigated under the government noise hierarchy.</p> <p>This change in background noise would have a direct impact on the tranquil character of the setting of these assets. The quiet of the countryside is a key part of the factors that contribute to the sense of place, and the increase of the background noise is a material factor which should be considered. The noise experts describe the noise which would be heard as a low industrial hum, which is out of character of the incidental agricultural noises (such as those noises generated by farming practices). Indeed, the noise report confirms this increase would be both day and night when the scheme is in operational phase. As a result, this change should be taken into account when assessing the impact of the Scheme on the significance of the assets. The table below provides this amended assessment.</p>			
<b>Receptor</b>	<b>Sensitivity of Receptor</b>	<b>Magnitude of impact (with embedded mitigation)</b>	<b>Residual effect (this mirrors the significant effect as a result of the lack of sufficient noise mitigation)</b>
Norton Manor (Grade II* NHLE 1023215)	High	<p>The Applicant concludes a neutral level of Magnitude of Impact to this asset. However, taking into account the impact of noise into the setting of the Manor it is considered that the impact would be <b>Low</b>.</p> <p>This is as a result of the increase in background noise, industrial in character, anticipated as a</p>	The resulting significant effect would be <b>Moderate Adverse (significant effect)</b>

<sup>5</sup> APP-160 and APP-161



		result of the proposed development.	
Gateway Boundary Wall to the South of Norton Manor (Grade II NHLE: 1023216)	Medium	<p>The Applicant concludes a neutral level of Magnitude of Impact to this asset. However, taking into account the impact of noise into the setting of the asset it is considered that the impact would be <b>Low</b>.</p> <p>This is as a result of the increase in background noise, industrial in character, anticipated as a result of the proposed development.</p>	The resulting significant effect would be <b>Moderate/Minor Adverse</b>
Gateway and Boundary Wall to Kitchen Garden, South of Norton Manor (Grade II NHLE: 1023218)	Medium	<p>The Applicant concludes a neutral level of Magnitude of Impact to this asset. However, taking into account the impact of noise into the setting of the asset it is considered that the impact would be <b>Low</b>.</p> <p>This is as a result of the increase in background noise, industrial in character, anticipated as a result of the proposed development.</p>	The resulting significant effect would be <b>Moderate/Minor Adverse</b>
Wellhead in Courtyard to the East of Norton Manor (Grade II NHLE: 1199011)	Medium	<p>The Applicant concludes a neutral level of Magnitude of Impact to this asset. However, taking into account the impact of noise into the setting of the asset it is considered that the impact would be <b>Low</b>.</p> <p>This is as a result of the increase in background noise, industrial in character, anticipated as a result of the proposed development.</p>	The resulting significant effect would be <b>Moderate/Minor Adverse</b>
Barn to the South West of	Medium	The Applicant concludes a neutral level of Magnitude of	The resulting significant effect would be



<p>Norton Manor (Grade II NHLE: 1199030)</p>		<p>Impact to this asset. However, taking into account the impact of noise into the setting of the asset it is considered that the impact would be <b>Low</b>.</p> <p>This is as a result of the increase in background noise, industrial in character, anticipated as a result of the proposed development.</p>	<p><b>Moderate/Minor Adverse</b></p>
<p>Church of All Saints (Grade II NHLE 1023214 ) and Unidentified Monument in the Churchyard, 3 Metres North of Porch, Church of All Saints</p>	<p>Medium</p>	<p>The Applicant concludes a neutral level of Magnitude of Impact to this asset. However, taking into account the impact of noise into the setting of the asset it is considered that the impact would be <b>Low</b>.</p> <p>This is as a result of the increase in background noise, industrial in character, anticipated as a result of the proposed development.</p>	<p>The resulting significant effect would be <b>Moderate/Minor Adverse</b></p>

**Avil’s Farmhouse**

Overview of effect:

Avil’s Farm is located in proximity to Lime Down E. The asset currently experiences very low background noise levels during the daytime and night-time periods, characterised by the absence of industrial noise sources. The predicted noise levels from the solar arrays would occur during the daytime only, which would be heard as a low industrial hum.

The noise level here is expected to be below the LOAEL but would still result in a change in background noise which would have an impact on the tranquil character of the setting of the asset during the day. The quiet of the countryside is a key part of the factors that contribute to the sense of place, and the increase of the background noise is a material factor which should be considered. The noise experts describe the noise which would be heard as a low industrial hum, which is out of character of the incidental agricultural noises (such as those noises generated by farming practices). As a result, this change should be taken into account when assessing the impact of the Scheme on the significance of the asset. The table below provides this amended assessment.

Receptor	Sensitivity of Receptor	Magnitude of impact (with embedded mitigation)	Residual effect (this mirrors the significant effect as a result of the lack of sufficient noise mitigation)
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<p>Avils Farm (Grade II NHLE 1022396)</p>	<p>Medium</p>	<p>The Applicant concludes a neutral level of Magnitude of Impact to this asset. However, taking into account the impact of noise into the setting of the farm it is considered that the impact would be <b>Negligible</b>.</p> <p>This is as a result of the increase in background noise, industrial in character, anticipated as a result of the proposed development.</p>	<p>The resulting significant effect would be <b>Negligible Adverse</b></p>
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## RODBOURNE CONSERVATION AREA

- 3.79 Rodbourne Conservation Area is located to the east of Lime Down Area E. The Applicant has presented an assessment on the Conservation Area which we have reviewed as part of the preparation of this report. In this review, we have noted that the Applicant has failed to consider the impact of the positioning of the access way to the immediate west of the Conservation Area. We provide this assessment here, concluding that the resulting effect to Rodbourne Conservation Area would be **Negligible Adverse** (in comparison to the Neutral effect found by the Applicant)
- 3.80 The introduction of up to 4-5 HGV vehicle movements per day<sup>6</sup> within the setting of the Conservation Area would interrupt the tranquil setting of the Conservation Area and introduce an aspect of the industrial character into the setting. These large vehicles would be heard and seen from the immediate setting of the Conservation Area and experienced on the approach into the Conservation Area. Whilst it is appreciated that the number of vehicles each day may vary, it is considered that the introduction of this level of vehicle movement of an industrial character would impact the tranquil character of the Conservation Area.
- 3.81 All elements of the asset’s setting should be taken into account when considering impact and the Applicant has failed to properly assess the impact of the increase of traffic and its impact on the tranquillity in the setting of the asset.

Receptor	Sensitivity of Receptor	Magnitude of Impact (with embedded mitigation)	Residual effect (this mirrors the significant effect as a result of the lack of additional mitigation)
Rodbourne Conservation Area	Medium	The magnitude of Impact is considered to be <b>Negligible</b> as a result of the impact on the tranquil setting of the rural conservation area caused by the increase HGV movements a day.	The resulting significant effect would be <b>Negligible Adverse</b>

<sup>6</sup> Using the revised calculations in line with the Railton TPC Ltd Transport Report for SLD



## 4 CONCLUSIONS

- 4.1 This Heritage Response has been prepared by Lucy Nicholson LLB (Hons), MA, Pg Cert, MRTPI, IHBC (who has focussed on built heritage) and Tom Linington, BA (Hons), MCiFA (who has focussed on archaeology) on behalf of Stop Lime Down.
- 4.2 This heritage and archaeology response provides a critical assessment of the built heritage and archaeological elements of the application made by the Applicant for the scheme at Lime Down Solar Park and has provided a further assessment as required of the Scheme's impact on built heritage and archaeology.
- 4.3 In preparation for this report, we have taken a proportionate review of the Applicant's submission and have consulted with the experts appointed by SLD. This report has been prepared to identify areas of assessment omitted in the Applicant's submission and to provide a proportionate assessment in their absence. As a result, this report (where appropriate) relies on the baseline work prepared by the Applicant with further research only carried out where considered necessary (for example in relation to Bradfield Manor). This report follows the methodology used by the Applicant to allow for a direct comparison where a change in resulting effect is found.
- 4.4 This report has found a significant adverse effect in relation to the Grade I Bradfield Manor as a result of the impacts of the Scheme. This has been found to arise from the erosion of the historic agrarian landscape, the change in the character of the views from the Parlour and the erosion of the agricultural setting and tranquil character of the Site. We await the requested verified views from the Applicant to judge any further success of the mitigation strategies.
- 4.5 In addition, this report has found adverse impacts to the group of assets at Alderton and the Conservation Area at Rodbourne as a result of the increase of traffic in the setting of the assets. A significant adverse effect has been found following the methodology matrix used by the Applicant to Norton Manor (Grade II\*) as a result of the noise impacts anticipated. Adverse impacts have also been found as a result of the noise impacts of the Scheme to the asset group at Norton and Avil's Farmhouse.
- 4.6 In relation to archaeology, it is our view that the impacts of the Scheme on the archaeological resource have not been fully and comprehensively assessed. We have provided detailed assessment which demonstrates that impacts on the archaeological resource associated with the Scheme are higher than those concluded by the Applicant and include significant effects. Furthermore, the present mitigation measures were found not to be sufficiently effective or proportionate to the asset's individual or collective significance.



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## 5 REFERENCES

British Geological Survey. (n.d.). *Geology Viewer*. Retrieved from Geology Viewer: <https://geologyviewer.bgs.ac.uk/>

Chartered Institute for Archaeologists. (2020). *Standards and guidance for historic environment desk-based assessment*. Reading: ClfA.

English Heritage. (2008). *Conservation Principles, Policies and Guidance*. English Heritage.

Historic England. (2015). *Management of Research Projects in the Historic Environment*. Historic England.

Historic England. (2015). *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2*. Historic England.

Historic England. (2017). *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning: 3*. Historic England.

LandIS. (n.d.). *Soilscapes Viewer*. Retrieved from LandIS: The Land Information System: <https://www.landis.org.uk/soilscapes/>

### MAPPING

- Range of Historic Ordnance Survey mapping
- GIS Basemaps available through Google, ESRI, and Ordnance Survey
- Satellite Imagery from ©Google Earth



# APPENDICES

## APPENDIX 1: ASSESSMENT METHODOLOGY

**NB THIS REPORT HAS FOLLOWED THE ASSESSMENT METHODOLOGY FROM THE APPLICANT TO ALLOW FOR COMPARABLE EFFECTS. PLEASE SEE [APP-064].**

### AIMS AND SCOPE

The aims of this study are to:

- Identify designated and non-designated built heritage assets that might be directly or indirectly impacted upon by the proposed development;
- Describe the heritage significance of designated and non-designated built heritage assets that might be directly or indirectly impacted upon by the proposed development;
- Assess the degree of impact of the proposed development upon the significance of built heritage assets;
- Assess the potential for the survival of archaeological remains within the proposed development Site, their likely condition and extent;
- Evaluate the significance of any potential archaeological remains and to examine whether this might be impacted upon by the Scheme;
- Consider if further evaluation of the Site's archaeological potential and significance is required, alongside any appropriate forms of mitigation;
- Review the impact of the proposed development in respect of the prevailing framework of policy and legislation.

*GPA 2: Managing Significance in Decision-Taking in the Historic Environment* (Historic England, 2015), provides information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). These include; assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.

For the purposes of assessing potential impact on the setting of heritage assets, the procedures laid out within the Historic England documents *Historic England Good Practice Advice Note 3: The Setting of Heritage Assets* (Historic England, 2017) have been followed.

This report has had reference to the policy and legislation as referenced by the Applicant in APP-064. This report follows the advice set out in Historic England Advice Note 12 - Statements of Heritage Significance: Analysing Significance in Heritage Assets (Historic England, 2019), which covers the National Planning Policy Framework requirement for applicants for heritage and other consents to describe heritage significance to help local



planning authorities to make decisions on the impact of proposals for change to heritage assets.

Advice set out within the Historic England documents Conservation Principles, Policies and Guidance (English Heritage, 2008), Management of Research Projects in the Historic Environment: The MoRPHE Project Manager's Guide (Historic England, 2015), and the Chartered Institute for Archaeologists' (CIfA) Standard and Guidance: historic environment desk-based assessment (Chartered Institute for Archaeologists, 2014) have been followed.

This report follows the Principles of Cultural Heritage Assessment (CHIA) guidance developed jointly by IEMA, IHBC and CIfA in July 2021. This document sets out a standardised framework which can be used to assess the impact of proposed works on cultural heritage assets and their significance, thus supporting their sustainable management.

## **THE HERITAGE RESOURCE**

The heritage resource is divided into two broad categories, designated heritage assets and non-designated heritage assets. Designated heritage assets are considered to be of national and regional importance, whilst non-designated heritage assets are considered to be of local importance.

Designated heritage assets consist of:

- World Heritage Sites
- Scheduled Monuments
- Listed Buildings
- Registered Parks and Gardens
- Registered Battlefields
- Protected Wreck Sites
- Conservation areas (for the purposes of this assessment, conservation areas will be included as designated heritage assets)

The various elements of the heritage resource have been taken into account, and the potential development impacts upon them considered.

## **SOURCES**

The following sources of heritage and planning data and information were consulted:

### **Designated Heritage Asset Data**

These datasets are available from Historic England and contain data on all recorded designated heritage assets in England, i.e., World Heritage Sites, Scheduled Monuments, listed buildings, Registered Parks and Gardens, Registered Battlefields and Protected Wreck Sites. The data was accessed in November 2025.



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## **Cartographic Sources**

Historic mapping was obtained online. Information from historic maps, other than tracing the above-ground development of a Site or place, can assist in the assessment of archaeological potential by highlighting previously unrecorded features, enabling an understanding of how the land has been managed in the recent past and identifying areas where development is likely to have removed or truncated below-ground archaeological deposits.

## **National Legislation and Planning Documents**

The treatment of the historic environment within a development and planning context is governed by legislation and national policy set out by National Policy Statements (NPSs) and the National Planning Policy Framework (NPPF). All relevant national and local planning policy documents were consulted in this report.

## **ASSUMPTIONS AND LIMITATIONS**

Much of the information used by this assessment consists of secondary information compiled from a variety of sources. The assumption is made that this information is sufficiently accurate.

The HER is a record of known archaeological and historic features. It is not an exhaustive record of all surviving historic environment features and it does not preclude the existence of further features which are unknown at present.