



## **Longfield Solar Farm Consultation: response from the Essex Society for Archaeology and History**

### **1. Introduction**

**1.1** The membership of the Essex Society for Archaeology and History (ESAH) has, since its foundation in 1852, embodied the greatest concentration of expertise on the archaeology and history of Essex. Consequently, the Society is well placed to comment on the cultural heritage/historic environment impacts of the proposed Longfield Solar Farm (LSF).

**1.2** It is clear that development of a solar farm on the scale of that proposed by the LSF, in an area of central Essex with an ancient landscape, diverse archaeological remains and significant built heritage, will inevitably have a variety of adverse impacts on the cultural heritage/historic environment. These adverse impacts will need to be weighed against the benefits of the LSF when, in due course, an application for a Development Consent Order is considered by the independent Examiner and Secretary of State. ESAH's comments on the current consultation are set out below.

### **2. Comments**

**2.1** With regard to the current consultation, it is good that cultural heritage is included in the consultation booklet. Though it is disappointing that the assessment of effects on page 20 of the booklet is limited to a small number of built heritage assets. It makes no mention of the historic landscape, and the only comment on archaeology is the statement that the developers intend to '...propose an appropriate archaeological mitigation strategy...' as part of their Environmental Statement. It is unfortunate that the consultation booklet does not better reflect the more detailed consideration contained in Chapter 7 of the Preliminary Environmental Information Review (PEIR). Whilst the information in the Cultural Heritage chapter of the PEIR is welcome, it has some significant flaws. The historic landscape appears to be under-represented, nor is there much sense that the three key components of the cultural heritage/historic environment; namely, archaeology, historic landscape and historic built environment are an integrated whole in dynamic relation to each other. Rather there is a tendency to treat them, and indeed individual heritage assets, separately. However, the cultural heritage/historic environment is more than the sum of its parts. Accordingly, it will be essential to develop an approach to the cultural heritage/historic environment which integrates those three elements. It also appears that the potential for knowledge enhancement is not fully appreciated.

**2.2** An integrated approach to the cultural heritage/historic environment, will ensure that the necessary mitigation and offsetting of damage and destruction to the historic environment

caused by the LSF, can make a significant contribution to our knowledge and understanding. In that regard, it should be noted that the wording of the National Planning Policy Framework, when considering historic environment/cultural heritage issues focuses on enhanced understanding provided by mitigation and offsetting. From what is known of the cultural heritage/historic environment, particularly in terms of archaeology, to the west and south of the LSF, it is reasonable to suppose that the results of such work will be important not only locally, but regionally. That should be made plain in the Environmental Statement as part of the reasoned justification for the LSF and be a key part of how the cultural heritage/historic environment is presented to the wider public. More particularly improved understanding of the cultural heritage/historic environment should be identified as an environmental enhancement.

**2.3** A prerequisite will be to establish from the outset a clear Research Strategy which can maximise enhanced knowledge so that individual elements of mitigation/offsetting can be seen as part of an integrated whole, rather than as disparate projects. Key to the creation of a Research Strategy will be the information from archaeological investigations to the west and south of the area of the LSF, most of which are published in easily accessible peer reviewed journals and monographs. It may also be helpful to refer to the Historic Environment Characterisation Studies for Braintree District and Chelmsford City Councils, which are available from the Local Authorities or from Place Services at Essex County Council.

**2.4** With regard to historic landscape, central Essex, including the area affected by the LSF has a landscape of great antiquity. Woods and hedges, frequently thought of as natural features, are human creations often of great antiquity, indeed next to the church, in most parishes they are likely to be the oldest easily visible remains of human activity. The pattern of field boundaries, woods, roads, tracks and footpaths is a significant survival from, the often remote, past into the present, and needs to be fully considered as such in assessing the cultural heritage/historic environment impacts of the LSF. That is especially significant since investigations to the west of the area of the LSF have shown that much of the present pattern of field boundaries developed in the Roman period (e.g., Rippon 2012). Whilst it is welcome that paragraphs 7.8.78-9 of the PEIR recognise the historic value of existing field boundaries, neither they nor other parts of Chapter 7 (Cultural Heritage) or Chapter 10 (Landscape and Visual), capture the likely historic time depth of such features, nor the intricate relationship of landscape features to below ground archaeology or historic buildings.

**2.5** In terms of historic built environment whilst Chapter 7 of the PEIR contains considerable information on the key buildings likely to be impacted and considers adverse impacts, that is largely done in terms of the individual structures. They need to be considered as integrated elements of the wider historic settlement pattern in the area affected by the LSF which, in common with much of central Essex, was dispersed and polyfocal. In particular it is essential to grasp the relationship of existing historic buildings in terms of the shifting character of historic settlement (see 2.6 below). Accordingly, the nature and location of buildings in the landscape are also important elements in the historic landscape and must be considered as such.

**2.6** In considering archaeological remains it is clear, from work to the west and south of the area affected by the LSF, that a wide variety of archaeological sites and deposits, ranging in date from prehistoric to post-medieval, are likely to be present. Whilst much of that is noted

in Chapter 7 of the PEIR its full significance does not appear to be appreciated, for instance the demonstration of the Roman origin of elements of the existing field boundaries noted in 2.4 above, is not included in the PEIR. In particular, paragraph 7.6.29 has misunderstood the nature of the medieval settlement pattern. The sites investigated to the west of the LSF include not only a scatter of farms, as that paragraph suggests, but quite major settlements including what may have been a manorial centre (Clarke, 2003). More importantly it is not the case that ‘...the Bulls Lodge farms were abandoned during the emparkation of Newhall Palace in the 13th century...’ the abandonment of these sites happened long before Newhall and its park were created in the 16th (not 13th) century. The critical point is that the areas historically dispersed and polyfocal settlement pattern was also *shifting*. The predecessors of existing late medieval or early postmedieval farms are often some distance away rather than occupying precisely the same location. That is true not only for the area to the west of the LSF but also to the south around the present village of Boreham, and can be demonstrated widely across Essex (e.g., Medlycott 1996; Gascoyne and Medlycott 2012). Once that point is understood it is clearly wrong to say that ‘...the DCO Site would have remained in continuous use. It is therefore expected that many of the post-medieval farmsteads extant within the DCO Site may have earlier medieval origins, and thus the potential for medieval farmsteads to be present within the modern fieldscape is lower...’ rather the chance of medieval settlement being present on the area affected by the LSF is every bit as high as on the land to the west.

**2.7** With regard to ensuring that necessary mitigation and offsetting delivers appropriate enhancement to the cultural heritage/historic environment and in establishing a clear Research Strategy; a critical point to understand, is that much of the landscape which will be affected by the LSF was for millennia functionally integrated with the Chelmer valley to the south. Whilst now largely severed by the line of the railway and A12, much of the ancient pattern of paths, tracks and roads led down into the valley. Since the PEIR and consultation booklet suggest enhancement of this ancient network of routeways is a key part of environmental benefit provided by LSF, it will be essential to re-establish the links across the railway/A12. Doing so will restore ancient links, and more particularly allow local inhabitants of the large villages of Boreham and Hatfield Peverel to access the paths and tracks in the area of the LSF. The simplest and most effective means to create such a link would be to provide a footpath along the edge of the Waltham/Boreham Road from its bridge over the A12 to the southern end of the north/south green route which the LSF proposes to establish.

**Submitted 30th June 2021, on behalf of the Council of the Essex Society for Archaeology and History** by Nigel Brown, BA, MCI(A), FSA, FSA Scot, 14, The Chase, Boreham, Chelmsford, Essex, CM3 3DY.

## References

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