

Online Comment

Application H16-0871-24
Location Land adj Pilgrim's Pride Limited Fulney Lane North Spalding PE12 6EP
Proposal Change of use of agricultural land and development for Solar array of up to 1.64 MWp and associated infrastructure including connection to Pilgrim's Pride Factory adjacent north

Name Historic Environment Officer
Address Lincolnshire County Council Lancaster House 36 Orchard Street LN1 1XX

Date Submitted 19-11-24
For/Against Comments

We would like to address the Historic Environment Desk-Based Assessment (HEDBA) Document Ref.: 278520.3 September 2024. The assessment correctly states that: "the site lies within an area of archaeological potential" and that "Any adverse impacts to buried archaeological features as a result of the implementation of the development proposals could be permanent and irreversible in nature.". However, the assessment overstates the knowledge we have of the significance of any archaeological remains which would be impacted by the proposed development. The presence, extent, depth and significance of archaeology cannot be determined until there is sufficient baseline evidence obtained through a geophysical survey, geoarchaeological assessments combined with a reasonable and appropriate level of trial trenching. The assessment also understates the level of impact caused by this type of development: development for Solar array of up to 1.64 MWp and associated infrastructure including connection cable. The HEDBA mention the ability to mitigate by design; nevertheless, the ability and flexibility for this is only as good as the knowledge of extent, character and significance of the archaeological resource on the site. We cannot plan mitigation appropriately against unevidenced conclusions. If unexpected archaeology were to be encountered this could lead to unnecessary destruction of heritage assets, potential program delays and excessive cost increases that could otherwise be avoided. If heritage assets of schedulable quality were found, there would not be a chance for retrospective refusal if planning permission had already been granted.

In accordance with national policy, the South East Lincolnshire Local Plan (Policy 29), and guidance We therefore recommend that pre-determination archaeological trenching be carried out in order for an informed recommendation to be made. The applicant has not adequately described the significance of any below-ground heritage assets that may be affected by the proposed development, and it is not "sufficient to understand the potential impact of the proposal on their significance (the heritage assets)" (Paragraph 200 of the National Planning Policy Framework (NPPF)). This in turn does not allow the Local planning authority to "identify and assess the particular significance of any heritage asset that may be affected by a proposal." (Paragraph 201 NPPF). It should be noted that the National Policy Statement for Renewable Energy Infrastructure (EN-3) states the following in footnote 94: "The results of pre-determination archaeological evaluation inform the design of the scheme and related archaeological planning conditions."

It is also important to avoid any unnecessary planning conditions that would place an unreasonable planning burden on the scheme if significant archaeology is discovered during post-consent evaluation work. Paragraph 56 of the NPPF applies in this case: "Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. Agreeing conditions early is beneficial to all parties involved in the process and can speed up decision making. Conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification."

Regarding any potential indirect impacts (setting) to the near standing listed building/Spalding Conservation Area, I defer comments to the SHDC Conservation Officer. To conclude, we will not be able to provide an informed recommendation on the application until the applicant has adequately evaluated the site. This includes the need for an appropriate level of trial trenching.