

Online Comment

Application H16-1096-23
Location Land between A16 and Rangell Gate Spalding
Proposal Proposed Anaerobic Digester Plant

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Date Submitted 06-11-24
For/Against Comments

Thank you for consulting us on this application.

This section previously commented on this application (23-01-24). I endorse and reiterate that previous advice.

Page 28 of the D&A Statement states: "

Archeology

Noting that the adjacent site consented in 2021 did not require any Archaeological investigation and nothing of significance was found during the excavations of the works. As part of the application the Lincolnshire County Archaeologist has noted that the site lies within an area of Archaeological potential associated with prehistoric and roman settlement activity evidence of Roman occupation having been found in 191 (1951) during the excavation of the Coronation Channel 300 metres to the North West of the proposed site. As such it is recommended that a trial trench investigation is carried out, we would ask that any such requirements are conditioned as part of any decision for the site."

In relation to the above D&A Statement: Archaeological recommendations are established on a case-by-case basis and depend on the scale, design, and potential impacts of the proposed development, which can vary. Additionally, archaeological advice may become outdated and is subject to change as new evidence emerges. Without established archaeological schemes of work, it is very difficult to determine whether any heritage assets might be exposed during excavation.

I continue to recommend that pre-determination archaeological trenching be carried out in order for an informed recommendation to be made. The applicant has not decisively 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."