

Online Comment

Application H17-1097-23
Location Land East of Surfleet Bank and West of Woad Farm Surfleet
Proposal Proposed plant based protein extraction facility and anaerobic digester plant

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

Date Submitted 05-11-24
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.

The site is located in an area of archaeological potential due to its proximity to roddon crests to the east. This has been confirmed by assessment of satellite pictures. Roddon crests in the wider Fen landscape are known to contain areas of archaeological remains, due to these hard, sand and clay filled channels representing areas of 'high' or more solid ground within the wider fen landscape.

Page 26 of the D&A Statement states: "As part of consultation responses to the application, the County Archaeologist has recognised that the wider area of the Fens are an area of archaeological potential associated with Pre-historic and Roman settlement and salt production activity. As such a trial trench evaluation has been requested which we would ask to be condition as part of any decision."

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."