

Online Comment

Application H20-1007-24
Location Land at Fendyke Farm Off Old Fendyke Sutton St James
Proposal Construction and operation of a solar farm and battery energy storage system (BESS), vehicular access, internal access tracks, landscaping, boundary treatment, cabling and associated infrastructure

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For/Against Comments

Document Ref.: PN3375/HEDBA/4 correctly establishes that the site lies within an area of archaeological potential due in part to roddon crests present on site, as evidenced by the geophysics Survey. 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. However, the assessment overstates the knowledge we have of the significance of any unknown and undetected non designated heritage assets which would be impacted by the proposed development. The HEDBA states: 'It is noted that a geophysical survey has not identified features of archaeological interest' However, the submitted Geophysics report states that: "[-] These variations may mask lower magnitude anomalies of different origin if present." Geophysics are not 100% reliable, especially in the Fens. Masked archaeological horizon might be present on site. 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. The HEDBA rightly states "4.42 It is noted that there has been limited past archaeological investigations within the 1km study area." The Fens has large areas of buried Iron Age and Roman archaeology, and because little in the way of development has gone on here, we are often faced with little or no direct evidence of potential remains. The HEDBA confirms 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. The presence, extent, depth and significance of archaeology cannot be determined until there is sufficient baseline evidence obtained through a geoarchaeological assessments combined with a reasonable and appropriate level of trial trenching archaeological evaluation. The HEDBA also mention the ability to mitigate by design: 1.3 The assessment [-] provides an assessment of the potential impact development would have on the significance of heritage assets and also provides design responses that would serve to reduce that impact [-]. 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. In accordance with national policy, the SE 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 207 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 208 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." Regarding potential indirect impacts to Built Heritage Assets, we defer comments to the SHDC Conservation Officer