

## PLANNING CONSULTATIONS

REFERENCE: PA/2015/0114

CASE OFFICER: JOANNA HEWETH



TEAM: HISTORIC ENVIRONMENT RECORD

AUTHOR: ALISON WILLIAMS, HISTORIC ENVIRONMENT OFFICER

TEL: 01724 297471

EMAIL: alison.williams@northlincs.gov.uk



SUBJECT: Planning permission to install standalone PV modules and associated infrastructure, Raventhorpe Lodge, Storage Land, Access Road In Raventhorpe Lodge Depot, Holme

PARISH: HOLME

DATE ISSUED: 13/03/2015

### SUMMARY OF ADVICE

- The application site lies within a largely un-investigated area where heritage assets of archaeological interest dating from the prehistoric period are anticipated
- In response to EIA screening, the HER advised a pre-application heritage assessment to include archaeological field evaluation comprising systematic fieldwalking, geophysical survey and sample trial trenching
- The submitted Heritage Assessment includes the results of a geophysical survey however the archaeological resource of the application site remains unknown until the field evaluation is completed as required by the NPPF (128) and local planning policies including saved local plan policy HE9
- Without the results of evaluation there is inadequate information for the planning authority to be able to make an informed decision in line with NPPF (131 – 135) and local planning policy
- The HER advises a **HOLDING OBJECTION** until further information is provided regarding the potential impact of the development on heritage assets
- The application should not be determined, except for a refusal, until this information is submitted and any appropriate mitigation measures agreed to avoid adverse impact or adequately mitigate loss of heritage assets
- Should a subsequent decision be taken to grant planning permission, conditions securing agreed mitigation measures in accordance with a Written Scheme of Investigation would be needed.

**HISTORIC ENVIRONMENT RECORD (HER) GROUP FUNCTION:** To hold, maintain, interpret and manage heritage information, enhancing the understanding of the area's historical development as a

distinctive and attractive place. HER information provides source material for interpretation by heritage professionals and for use by community groups and individuals.

The Group also provides advice on development proposals that affect, or may affect, the sites and settings of all heritage assets i.e. designated and non-designated historic buildings, archaeological sites and monuments, and historic places, areas and landscapes. This advice is provided against saved local plan policies and national historic environment policies.

**DETAILED ADVICE:** Thank you for consulting the HER on this application.

### **Archaeological Background**

Our records show that there is potential for the application site to contain archaeological remains of prehistoric and Roman date. A rapid appraisal of the HER reveals that within the development site and the immediate vicinity there are a number of heritage assets of archaeological significance. These include the Scheduled Monument of Raventhorpe medieval settlement to the north and evidence of widespread prehistoric and Roman occupation and activity along the Bottesford Beck valley to the south.

There has been no previous systematic archaeological survey on the development site or across the surrounding area of the Bottesford Beck, although three Neolithic stone axes, two from within the site boundary and one just to the west, have been found and recorded on the HER. In our assessment the development site has the potential for the presence of other as yet unidentified archaeological remains. The proposed development would have the potential for direct physical impacts to destroy archaeological remains as well as indirect impacts affecting the contribution of the setting of the Scheduled Monument to its significance.

### **Pre-Application Advice**

I provided pre-application advice in August 2014 in response to the EIA screening request for this development, advising that the results of a heritage desk based assessment and archaeological field evaluation would be required together with any appropriate mitigation proposals to inform a planning application.

The HER advises that a detailed heritage assessment of the development site should comprise the following elements:

#### **Desk-Based**

- 1) Desk based research to collate the current available information relating to all designated and non-designated heritage assets within 1km of the boundary of the application site; consultation of the HER is a requirement of the NPPF
- 2) Site walkover survey of the application area to identify the presence of any above or below ground archaeological remains or any constraints on archaeological fieldwork
- 3) Collation of data relating to all proposed installation and construction work and methodologies that would potentially impact any heritage assets including solar panel foundations/anchor system; cable trench details and routes, additional landscaping, and building foundation details, etc

#### **Field Evaluation**

- 4) Systematic surface collection of artefacts (fieldwalking)
- 5) Geophysical survey of the application area to identify and map buried features of potential archaeological origin, followed as necessary by
- 6) Excavation of sample or targeted trial trenches to confirm the findings of the above stages and determine the nature, extent, state of preservation and importance of any archaeological remains within the application area

#### **Assessment**

- 7) Assessment of the significance of those heritage assets likely to be directly or indirectly impacted by the development, including the contribution made by their settings
- 8) Assessment of impact of the proposed development on the significance of the heritage assets based on the findings of the preceding stages, with reference to details of proposed construction ground works.

This advice was reiterated at a meeting with the applicant in September.

### **Information Submitted**

The submitted Heritage Assessment report prepared by Allen Archaeology Ltd includes the results of a desk top assessment based on records of existing known heritage assets on and around the application site and the results of a geophysical survey of the site.

The report concludes that the site has low archaeological potential and that it is considered no further archaeological work is required to inform the planning application. The HER disagrees with this conclusion for the following reasons

- It is based on an absence of evidence rather than evidence of absence, given the lack of archaeological investigations in this area
- The geology of the site is blown sand, which is not conducive to providing reliable geophysical survey results without further confirmation from other evaluation techniques including trial trenching
- The methodology for assessment is based on criteria and matrices designed to satisfy the EIA Regulations rather than providing an appropriate assessment of the level of harm and whether a development is sustainable or not in terms of the historic environment policies as set out in the NPPF
- The direct physical impacts of the proposed development are inadequately described indicating that the assessment has underestimated impacts. These direct impacts will include:
  - Approximately 160,000 photovoltaic solar panels and their associated support frames and cabling
  - Inverter Stations and other infrastructure buildings
  - Access tracks and turning areas
  - Security fencing
  - CCTV security camera poles and associated cabling
  - Engineering of swales
  - Decommissioning (pulling up of piled frames) and reinstatement of agricultural land

With regard to the assessment of indirect impacts on heritage assets and their settings, we are satisfied that the information and photographic evidence provided in the accompanying LVIA is sufficient and that the proposed development will not harm the special significance of Raventhorpe medieval settlement, a Scheduled Monument.

### **Policy and Guidance**

Paragraphs 128 & 129 of the NPPF require an applicant to submit sufficient information about the significance of any heritage assets that their proposals may affect that allows the local planning authority to assess the degree of impact on heritage assets and their settings, and how this impact may be mitigated, if at all. Paragraph 128 states that ***'Where a site on which development is proposed includes or has the potential to include heritage assets of archaeological interest, local planning authorities should require developers to submit an appropriate desk based assessment and, where necessary, a field evaluation.'***

This information allows the planning authority to make an informed and reasonable decision in line with the NPPF as well as local planning policies including policy CS6 of the North Lincolnshire Core Strategy and saved local plan policy HE9 Archaeological Evaluation, the latter states that ***'Planning permission will not be granted without adequate assessment of the nature, extent and significance of the remains present and the degree to which the proposed development is likely to affect them.'*** Policy 4 Heritage Assets of the adopted SPD on Renewable Energy will also apply.

It is noted that the Heritage Assessment report does not refer to policy HE9 in the Planning Background section.

Where impact assessment shows that the significance of heritage assets will be adversely affected by the proposals, then consideration should be given to drawing up appropriate mitigation measures to conserve them. This may include avoiding or minimizing disturbance to assets and areas of significance, if necessary by modifying the layout and/or design of the proposals.

The impact of development on all heritage assets is a material consideration and the NPPF includes policies to guide the determination of applications relating to designated and non-designated heritage assets (policies 131-135).

Where loss of heritage assets of archaeological interest as a result of development is considered justified, the NPPF makes provision to allow for the recording and advancing understanding of the heritage asset before it is lost using planning conditions or obligations as appropriate (Policy 141). Such recording may range from pre-development detailed archaeological excavation of selected areas, followed by post-excavation analysis and publication of results, to archaeological monitoring and recording during construction work. The NPPF states that the results of these investigations should be made available to the public via the HER and that the archive evidence should be deposited with a local museum.

Local Plan policy HE9 states that ***'When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording before and during development.'***

Mitigation proposals, including any necessary layout or design amendments, and/or a programme of archaeological recording, should be submitted with the application in the form of a detailed written scheme of investigation (WSI) for consideration by the planning authority. Requiring the production and submission of a WSI is in accordance with paragraphs 130 -132 and 140 of the Historic Environment Planning Practice Guide to PPS5, which continues to inform the NPPF. This is to ensure that all parties understand the archaeological requirements. An appropriate mitigation strategy may then be secured by the council's standard conditions to any permission that may be granted.

### **Assessment**

In our opinion, the proposed development would have the potential for direct physical impacts that would disrupt and destroy any archaeological remains within the development area. Given the available evidence, including the finds of prehistoric stone axes within and adjacent to the development site, we consider that this favourable south facing slope of the Bottesford Beck valley has further potential to contain archaeological remains associated with human occupation and activity not detected by the geophysical survey due to the nature of the geology.

Unfortunately the results of the desk based research and geophysical survey does not provide sufficient information with which to assess the impact of the proposed development on any archaeological remains that may survive, nor is the mitigation of harm with archaeological monitoring during construction work considered to be acceptable given this lack of information.

At the present time therefore, there is insufficient information available to adequately assess the nature, depth, extent and significance of the archaeological resource within the application site. Any archaeological remains present within the site are likely to be destroyed or substantially adversely affected by the extensive groundwork associated with the proposed development across the entire site.

In order to provide this information, the applicant should complete the archaeological field evaluation as previously advised and set out above.

Appropriately qualified specialists should undertake this work on the applicant's behalf in accordance with the HER standard briefs and with the relevant Institute for Archaeologists published Standards and Guidance (<http://www.archaeologists.net/>) and English Heritage professional guidelines (<http://www.english-heritage.org.uk/publications/guidelines-and-standards>).

The assessment of the significance of heritage assets should be based on the values set out in *Conservation Principles, Policies and Guidance for the sustainable management of the historic environment*, English Heritage, 2008 <http://www.english-heritage.org.uk/publications/conservation-principles-sustainable-management-historic-environment/>.

On completion of all stages of the evaluation and assessment a written report presenting the results should be submitted as supplementary information to the planning application together with specific mitigation proposals in the form of a detailed written scheme of investigation before the application can be determined.

### **Recommendation**

In view of the potential significance of the archaeological resource within the application site and the lack of information to adequately assess the impacts of the development, or the opportunities for conservation and/or mitigation, the HER advises a **HOLDING OBJECTION** to the application until such time as further information is submitted.

The field evaluation could be completed relatively rapidly; if the results cannot be completed within the determination period the applicant could be advised to withdraw the application with a view to resubmission once the required information is available.

If the applicant does not submit this information, and if for any reason the planning authority has to determine the application in its present form, the application should be **refused** as it is contrary to the NPPF, Core Strategy policy CS6, Local Plan policy HE9 and Policy 4 Heritage Assets of the adopted SPD on Renewable Energy; inadequate information has been provided to allow the Local Planning Authority to assess the impact of the development on the heritage assets, or to approve an appropriate mitigation strategy.

Once sufficient information is available to make an informed assessment and decision in accordance with policy, should a subsequent decision be taken to grant planning permission, conditions securing agreed mitigation measures in accordance with a Written Scheme of Investigation would be needed.

If the planning authority is minded to accept this advice, I would be grateful if you would inform the applicant of the requirement to submit the assessment at the earliest opportunity. I would be pleased to provide the applicant with further advice about the scope of the assessment and with copies of the HER standard briefs.

I trust this recommendation is acceptable.