

Whitlock, Melissa

From: Stephen Pointer [REDACTED]@nottsc.gov.uk>
Sent: 30 January 2024 23:16
To: Cottam Solar Project
Subject: Nottinghamshire CC response to Examining Authority's second written questions and requests for information (ExQ2)

Categories: Deadline

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Dear Cottam Solar Project ,

I am pleased to provide below the response of Nottinghamshire County Council to the examining authority's second written questions:

2.2.4 Nottinghamshire County Council in its response to ExQ1.2.5 [REP2-075], has referred to Policy WCS2, which does not appear to have been identified at paragraph 2.68 in its Local Impact Report [REP-086]. Please provide a copy of the policy wording.

The relevant policy from adopted Waste Core Strategy 2013 reads as follows:

Policy WCS2 Waste awareness, prevention and re-use

Nottinghamshire County and Nottingham City Councils will lead by example and work together with district and borough councils, the waste industry, local businesses, communities and voluntary groups to improve waste awareness and encourage measures aimed at waste prevention and re-use. All new development should be designed, constructed and implemented to minimise the creation of waste, maximise the use of recycled materials and assist the collection, separation, sorting, recycling and recovery of waste arising from the development

2.9.7 LCC and NCC have both referred to percentages of how much of the Order limits should be the subject of trial trenching at this stage (2%,3-5%), including at ISH2. Please provide details of where these percentages are taken from, as regards guidance.

A number of projects have investigated the success rate of different levels of evaluation trenching. The most recent, from 2022, was funded by HE, and involved ClfA. This is its link;

<https://www.archaeologists.net/sites/default/files/projects/EVALS%201%20Final%20Report%20for%20publication.pdf>.

This quotes earlier work by Waller, 2008, from her PhD thesis (Waller, R., 2008. [Archaeological evaluation, land use and development: an application of decision analysis to current practices within local government development control processes](#). Doctoral Thesis (Doctoral). Bournemouth University.) "Waller concluded that "an untested industry standard set around a 2%...is flawed and unsustainable...Trial Trenching has now been shown by this research to require at least a 6% sample to identify 66% of periods present on a site and a Sample Percentage size of 10% is even more preferable [to] allow Archaeological Curators to be confident that the results of Field Evaluation will provide enough information to accurately predict the Date and Type of any archaeological remains present on a potential development site." (Waller 2008, 209). It is worth noting Ruth Waller was a curatorial archaeologist with 16 years' experience at the time of her thesis.

Both of these pieces of work build on the work of Hey and Lacey (Hey, G. and Lacey, M. 2001. Evaluation of Archaeological Decision-making Processes and Sampling Strategies. Oxford, Oxford Archaeological Unit). This work provides useful insights to the types of sites that will be missed by evaluation sampling at variable levels. As

curators, we should not be working to % levels, but when significant applications come through with such low levels of intrusive evaluation, there is little alternative.

Developing regional policy will recommend that a positive and professional approach to evaluation is adopted across the region, supported by an evaluation rate of the total proposed development area of between 3% and 5%.

2.9.8 LCC and NCC raised concerns at ISH2 around the ability of the Applicant's trial trenching to pick up discrete, earlier features and shallow burials. Please explain why.

The works quoted above each demonstrated that isolated features are frequently not identified at evaluation rates of less than 10%. Complex and highly significant sites can be totally missed by evaluation at low rates. Archaeological sites for which standard trenching evaluation techniques only work by serendipity include Palaeolithic, Mesolithic, most Neolithic, a fair bit of Bronze Age, and almost all Anglo-Saxon sites. That covers most of human history.

2.9.9 At ISH2, references were made to the percentages of trial trenching which had been sought on other developments in the area. The Applicant subsequently submitted a Comparison of Archaeological Evaluation Investigations on Solar Schemes document [REP3-041] which includes schemes in Lincolnshire and Nottinghamshire. To what extent do these sites (or some of these sites) share archaeological similarities with the Order limits and how does this translate to the 'need for a flexible approach to evaluation', as is set out in paragraph 1.1.8 of the Comparison of Archaeological Evaluation Investigations on Solar Schemes document [REP3-041]?

Most curatorial archaeologists would probably agree that we have in the past let far too many sites go for development without adequate evaluation, as this Comparison document shows. There are a range of reasons why this has happened. As an example we have been told that the actual development impact is minimal. Increasing experience of seeing such sites being constructed, plus seeing the early ones come forward for refurbishment schemes have allowed us to re-consider. Preceding cases which were not dealt with in an appropriate manner, for whatever reason, should not be used to justify continuing loss of the largely unknown archaeological resource without record.

2.9.12 Please comment on the Archaeological Trial Trenching Evaluation Fieldwork Report for the Shared Cable Corridor document submitted by the Applicant at Deadline 3 [REP3-049].

No specific response received from the Councils Archaeologist.

2.9.14 The ExA notes that the Statements of Common Ground are being updated with LCC (and presumably NCC) to show where there is agreement and disagreement over the Archaeological Mitigation WSI [APP-131] to reflect ongoing discussions. The final versions to be submitted at Deadline 5 need to set out clearly where the areas of agreement and disagreement are at the close of the Examination (and please avoid the use of comment boxes in the final versions).

This is noted and Nottinghamshire County Council will co-operate with other parties to ensure this requirement is met by Deadline 5.

Stephen Pointer MRTPI
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From: Stephen Pointer <[REDACTED]>
Sent: Wednesday, January 31, 2024 9:35 AM
To: Cottam Solar Project <CottamSolarProject@planninginspectorate.gov.uk>
Subject: RE: Nottinghamshire CC response to Examining Authority's second written questions and requests for information (ExQ2)

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Dear Melissa

Thanks very much.

Please note for clarification that the NCC Archaeologist did not provide an answer to question 2.9.12 because it was considered that the Lincolnshire Archaeologist had dealt fully with the matter. The question was directed at both authorities.

Kind regards,

Steve

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