

One Earth Solar Farm Development Scoping Report – Historic Environment Comments Newark & Sherwood District Council

The Environmental Impact Assessment scoping report for One Earth Solar Farm sets out the proposed approach regarding Buried Heritage at Chapters 9.

Despite initial positive contact we have concerns regarding the approach to archaeology as set out in the Buried Heritage section of the submitted scoping report.

The approach will need to use the standard full suite of archaeological evaluation techniques in order to provide sufficient data for a full understanding of the archaeological potential across the order limits. This is necessary to inform a reasonable and appropriate mitigation strategy in the Environmental Statement (ES) and will need to be submitted with the Development Consent Order (DCO) application.

should include as a minimum an appropriate Historic Environment Record search, air photo assessment, LiDAR assessment, historic mapping and any other relevant local sources. The DBA supported by the geophysical survey results will help inform a robust programme of trial trenching to provide evidence for the site-specific archaeological potential of the development and provide the basis for an effective mitigation strategy to deal with the archaeological impact.

The proposed lack of evaluation (geophysics and evaluation trenching) is of very significant concern. Failure to undertake sufficient evaluation in a timely manner, pushing evaluation and subsequent agreement of the mitigation strategy to post consent is a high-risk strategy which can easily lead to significant construction delays and escalating costs as well as unnecessary destruction of heritage assets. It may also lead to consent for a scheme which is subsequently found to be undeliverable in terms of the details submitted with the application.

The full extent of the proposed impact area including the cable connector route corridors must be included in the evaluation process.

The scoping report recognises the extensive and diverse range for archaeological remains within the site boundary and acknowledges the high potential for the survival of as yet unknown archaeological remains (Section 9.11).

At Section 9.19 the scoping report proposes the production of an Archaeological Desk-Based Assessment (DBA) in support of the ES chapter and outlines the elements that will be contained within that document. We agree that a DBA is necessary and broadly support the outline proposal in this regard. It is vital that a competent full DBA be completed at the earliest opportunity in order to inform further phases of work. This should include as a minimum an appropriate Historic Environment Record search, air photo assessment, LiDAR assessment, historic mapping and any other relevant local sources.

However, at Section 9.20, the scoping report makes it clear that the ES Chapter will be based entirely on the DBA without the support of further non-intrusive or intrusive fieldwork. This is wholly insufficient to assess the archaeological potential of the site, nor will it be sufficient to inform an appropriate mitigation strategy.

It is critical that the applicant have the baseline evidence to be able to assess and understand the site-specific impact of the development on the archaeological resource. Non-intrusive survey (ie.

geophysics and fieldwalking) must be tested with site-wide evaluation trenching as a minimum requirement to properly understand the archaeological potential within the developmental impact area.

The evaluation work must be completed in time to inform the mitigation strategy which will lay out how the developmental impact on archaeology will be dealt with, therefore this will need to be submitted as part of the DCO application. We would expect the DBA to be complete and the field evaluation to be well underway by the time the PEIR is produced.

The scoping report anticipates undertaking a limited programme of field evaluation prior to construction (Section 9.21). Again, we strongly disagree that post-consent is the correct time to undertake investigative work that should be informing the application.

We would further raise the issue of only targeting areas identified in the DBA (Section 9.21) which is necessarily limited to known data. This approach is flawed and would lead to a limited understanding of the archaeological resource based on confirmation bias rather than a genuine programme of investigation.

Sections 9.17 and 9.23 seek to scope out impacts from the operational phase. We do not accept that there will be no impact from maintenance of the site. Many older solar farms are currently undergoing significant redevelopment during their operational life, including complete removal of panel infrastructure and highly intrusive groundworks. For areas where preservation *in-situ* is preferred, measures will need to be implemented in the OEMP to ensure there is no impact to the archaeological resource.

Section 9.24, we do not agree with the applicant's belief that decommissioning will result in no impact to the archaeological resource. The removal of infrastructure can be more damaging in many circumstances than the initial installation. Decommissioning impacts will need to be considered at the application stage and appropriate mitigation secured as part of the DCO requirements.

In conclusion, the EIA will require the full suite of comprehensive desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact. The results should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation. The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), and the National Planning Policy Framework.

Sufficient information on the archaeological potential must include evidential information on the depth, extent and significance of the archaeological deposits which will be impacted by the development. The results will inform a fit for purpose mitigation strategy which will identify what measures are to be taken to minimise or adequately record the impact of the proposal on archaeological remains which must be submitted with the EIA.

This is in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which states *"The EIA must identify, describe and assess in an appropriate manner...the direct and indirect significant impacts of the proposed development on...material assets, cultural heritage and the landscape."* (Regulation 5 (2d))