



Historic Environment - Archaeology Planning Consultation Comments

RE: 19/00522/NSIP **Proposal Site: Potential Aquind Interconnector Site, Old Mill Lane, Lovedean, Denmead**

Recommendation: No objection subject to strengthened provisions securing:

- A detailed archaeological mitigation strategy (not only field work methodologies, including the treatment of human remains, but also all post-excavation work, dissemination / reporting and appropriate publication, archiving and public outreach);
- Appropriate archaeological excavation and recording of human remains of archaeological interest.

Key issues:

1. The preservation, conservation, investigation and recording of archaeological interest in line with EN-1 (also Policy DM26 Winchester District Local Plan Part 2; Policy CP20 Winchester District Joint Core Strategy; NPPF Section 16, NPPG).

Scope of comments:

These comments relate to that part of the Scheme that lies within the Winchester City Council district boundary and pertain to non-designated below ground heritage assets (archaeology). There are no Scheduled Monuments within the WCC part of the study area or the identified zone of theoretical visibility and thus there are no associated setting considerations (6.2.2.1 & 6.2.21.2 ES Vol. 2 Fig's 21-22).

Comments and advice:

The proposal site (interconnector and cable trench) will impact a number of known and currently unknown non-designated buried heritage assets.

National and Local Planning Policy and Advice:

Section 5.3.9 of the Planning Statement (document ref. 5.4) relates to the Historic Environment and deals with applicable policy from EN-1. Relevant policy and advice is also summarised in Section 21.2.3.6 of Chapter 21 of the Environmental Statement (document ref. 6.1.21) and Section 2.2 of the Historic Environment Desk Based Assessment (DBA) (document ref. 6.3.21.2).

It is considered that all relevant National and Local Planning Policy and guidance have been fully considered within the Environmental Statement for this proposal.

Assessment Methodology:

The methodology used to assess the impact of the proposal on non-designated buried heritage assets within the Order Limits comprises established sector methodologies and guidance. As such the process and methodologies used are considered to be sound.

The extent of the study area and the range of sources, together with information from relevant previous site investigations used in the DBA (Doc Ref. 6.3.21.2, Sections 3.2, 3.4 & Table 1) are appropriate. The DBA is thus considered to form a sound base line study upon which the impacts of the proposal on the Significance of known and anticipated buried heritage assessments can be assessed and understood. These impacts have been appropriately assessed in Chapter 21 of the ES Vol.1.

Key Issues requiring clarification:

Human remains

Part 7 sections 48.(1) to 48.(18) of the draft Development Consent Order (Document ref. 3.1) covers procedures for dealing with human remains within the Order Limits. However these seem largely directed at more recent burials, rather than burials / human remains of archaeological interest.

Human remains of archaeological interest are anticipated in Section 1 of the Order Limits, as identified in section 1.4.2 of the DBA (document ref. 6.3.21.2).

Section 48.(16) states that “Section 25 of the Burial Act 1857(a) (bodies not to be removed from burial grounds, save under faculty, without licence of the Secretary of State) shall not apply to a removal carried out in accordance with this article”. However this is the normal procedure for the archaeological excavation of human remains.

Appropriate provisions should be made for the archaeological investigation, recording, analysis and publication of burials / human remains of archaeological interest within the Development Consent Order. The Development Consent Order should align with the mitigation measures and procedures set out in ES Vol. 1 Chapter 21, Para. 21.2.2.3 (document ref. 6.1.21) and Section 1.4.2 of the DBA (document ref. 6.3.21.2)

Mitigation

Para. 2.(1) (c) of Part 1 of the draft Development Consent Order (document ref. 3.1) confirms that “onshore site preparation works” meaning includes pre-construction archaeological investigations.

Access to the land to undertake archaeological investigations within the Order Limits is secured by Part 4, 19.(1) (c) of the draft DCO.

SCHEDULE 2 Part 14.(1) of the draft DCO deals with Archaeological Requirements. Note, given the identified element of uncertainty regarding below ground heritage assets within the Order Limits (e.g. ES Vol.1 Chapter 21, para. 21.4.3.1 & 21.8.1.3, document ref. 6.1.21), all parts of Route Sections 1 and 2 that lie within the Winchester city council boundary should be considered to comprise “areas of archaeological interest” as set out herein.

Following the PEIR submission, a broad archaeological mitigation strategy was agreed with the applicant’s archaeological consultant (ES Vol. 1 Chapter 21, Section 21.3.4, document ref. 6.1.21). This broad strategy will be an iterative process, comprising an initial stage of evaluation trenching, to be followed by archaeological excavation ahead of construction / other enabling works or archaeological watching brief during construction, as required.

Although the nature of which post evaluation mitigation measure might be required in particular areas within the Order Limits cannot as yet be identified, ES Vol.1 Chapter 21, para. 21.4.2.19 (document ref. 6.1.21) provides an indication of the circumstances in which different mitigation measures might be applied.

At the post-PEIR stage, it was advised that the ES should contain a detailed, robust and flexible archaeological mitigation strategy, appropriately resourced and timetabled in relation to the overall construction programme, following the granting of any DCO.

Although a detailed archaeological mitigation strategy (including elements such as post-fieldwork assessment, analysis, publication / dissemination and public outreach etc.), has not been undertaken (although some elements are briefly mentioned, e.g. in para. 21.8.1.7, ES Vol. 1 Chapter 21, document ref. 6.1.21), the agreed broad mitigation strategy has been further developed, based on anticipated survival, for example, whether a greenfield or a brownfield area and likely impacts, and is detailed in the following documents:

- Doc. Ref. 5.4 Planning Statement (Para. 5.3.9.9);
- Doc. Ref. 6.6 Mitigation Schedule (Chapter 21, MS ref. 21.3-9);
- Doc. Ref. 6.9 Onshore Outline CEMP (Section 5.8);
- Doc. Ref. 6.1.21 - ES Vol.1 Chapter 21 (Section 21.8 & Table 21.6).

There are some concerns over the vagueness and looseness of some the language used in detailing the mitigation proposals within the various documents of the ES (for ease of reading references are largely limited to Chapter 21 of the ES, document ref. 6.1.21).

For example, in ES Vol 1 Chapter 21, para. 21.8.1.1 (document ref. 6.1.21), refers to mitigation ... “where *feasible* and warranted” (my emphasis). A further example is in para. 5.3.9.9 of the Planning Statement, where it is indicated that “Mitigation of these construction Impacts.... is *proposed* to include (my emphasis).

It is also unclear as to what scope there would be to implement a preservation *in situ* strategy which “*may be* a requirement, where *feasible*...” (ES Vol.1 Chapter 21 21.8.1.6 Strategy 1, document ref. 6.1.21).

Palaeoenvironmental sampling (ES Vol.1 Chapter 21 para. 21.8.1.16, document ref. 6.1.21) may be required elsewhere along the Order Route, for example in areas where colluvium is present.

Securing mechanisms

ES document ref. 6.6 - Mitigation Schedule summarises the proposed archaeological mitigation strategy and sets out the Control Document/ Licence and Securing Mechanism for this; namely the Onshore Outline CEMP (document ref. 6.9) and the draft DCO (document ref. 3.1). With regard to the latter, attention is drawn to previous comments relating to human remains.

Within the Mitigation Schedule, it is questioned whether the securing mechanism for MS ref. 21.3 to 21.7 (inclusive) should refer to Draft DCO, Schedule 2, Requirement 14 (Archaeology) as for MS ref. 21.8 to 21.9 and not Requirement 15 (Onshore Outline CEMP)?

The provisions set out in the draft DCO Schedule 2, Requirement 14 do not fully accord with the proposed archaeological mitigation strategy detailed in the documents referenced above. In particular 14._(3) and (5) do not refer to the initial stage of archaeological evaluation (trial trenching) or possible preservation *in situ*, proposed in the mitigation strategy.

Historic Hedgerow

One hedgerow with the Order Limits has been identified as ‘important’ under the Hedgerow Regulations (heritage criteria) and marks an historic parish boundary (Para. 21.5.2.4, ES Vol 1 Chapter 21, document ref. 6.1.21). This is identified as **A158**, in section 1.4.1 of the DBA and as **HR02** on 2.12 – Hedgerow and Tree Preservation Order Plans Sheet 1 of 10.

Table 21.1 of ES Vol 1 Chapter 21 Heritage and Archaeology (document ref. 6.1.21) indicates that this hedgerow has been ‘scoped out’ as it would not be impacted by the Proposed Development. The retention of this hedgerow is welcomed and this is confirmed by Part 7 41._(4) (b) and Schedule 12 of the draft DCO (document ref. 3.1).

Other errors and omissions:

Document ref. 6.6 Onshore Outline CEMP Section 5.8 Heritage and Archaeology.

- Para. 5.8.1.3 omits relevant text outlining the three proposed strategies compared to Section 21.8.1.1 of ES Vol. 1 Chapter 21).
- Para. 5.8.1.4 further diverges from the text of ES Vol. 1 Chapter 21 para, 21.6.2.3 & 21.8.1.2 – the former identifying a working width of up to 19m, the latter, up to 23m.

Document ref. 6..21 ES Vol 1 Chapter 21 Heritage and Archaeology:

- Para. 21.2.3.6 – WCC Local Plan Policy – the old 2006 Local Plan is noted here, not the adopted Local Plan Part 2;
- Section 21.4.1.1 – Although the archaeological monitoring of geotechnical test pits is considered in the ES, the report on this monitoring has not been included as previously agreed;

Document ref. 6.3.21.2 ES Vol. 3 Appendix 21.2 Historic Environment Desk Based Assessment:

- Formatting errors means that paragraph numbers are not easy to equate with the text; hence on occasion only section numbers are referenced;
- Section 2.2.2 WCC Local Plan Policy – the old 2006 Local Plan is noted here, not the adopted Local Plan Part 2;
- Figure 1-18 are missing;
- Appendix 1 – Historic Environment Gazetteer is missing;
- Section 3.4.2 & 4.3.1 – Although the archaeological monitoring of geotechnical test pits is considered in the DBA, the report on this monitoring has not been included in the ES as previously agreed;

Impact on buried heritage assets

ES Vol. 3 Appendix 21.5 (document ref. 6.3.21.5) and Section 21.6.3 / Table 21.6 of ES Vol.1 Chapter 21 (document ref. 6.1.21) outline the predicted effects of the proposed development on buried heritage remains within the Order Limits. Within Route Sections 1 and 2, effects are variously predicted to be of minor, moderate or major adverse significance. Following mitigation, residual effects are assessed as negligible. These conclusions are accepted.

Although the proposed development will result in permanent adverse effects to buried heritage assets, appropriate mitigation measures to address this harm can be undertaken as outlined. Given the nationally significant benefits which would arise from this scheme, it is considered that these would outweigh the identified harm to buried heritage assets. Accordingly it is considered that with the implementation and completion of appropriate archaeological mitigation measures, the proposed scheme would accord with Policy EN-1.

Requirements

The addition of further detail and strengthening of the proposed archaeological mitigation strategy, including for human remains, the submission of an appropriate WSI and its implementation in full would need to be adequately controlled and secured.

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