



Historic England

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Our ref:
PL0052202
Your ref:

Telephone



18 May 2023

Dear Sir or Madam

Strategic regional water resource solutions: standard gate two draft decision for South Lincolnshire Reservoir

Thank you for consulting Historic England on the above. Apologies for the delay in response.

As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of heritage assets is fully considered and accorded proper weight in accordance with legislation and the National Planning Policy Framework at all stages and levels of the process.

Overall, Historic England (HE) are strongly concerned regarding the lack of reference to the historic environment in the draft decision, particularly as other key stakeholders are referenced for further work, such as ecological (for example Appendix A, actions 9). We suggest that the work recommended should be included in the draft decision recommendations. There is no reference to detail of scheme, a particular area of concern for HE is the proposed bunding / embankment for this scheme, and subsequently the assessment required.

Please refer to our previous letters. We have the following comments at this time:-

3.4.4

As previously stressed Historic England have concerns regarding the level of assessment carried out and evidence base provided prior to selection of the site. Please refer to our previous responses.

It is noted that reference is made to the solution falling short in some areas, Historic England's concerns and the historic environment are not referenced.



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3.4.5

Reference to the solution falling short in some areas of the environmental assessment is welcomed, does this include the historic environment?

There is strong concern regarding the potential impact upon the historic villages of Screddington, Helpringham and Swaton, associated heritage assets and the views between the Grade I churches, in particular kinetic views east to west between settlements. There is very strong concern regarding the proposed embankment; previously described as up to 13.8 metres high (where we had raised very strong concerns and potential objections), rather than 25 metres as described in the current consultation. There is a high risk of nationally important archaeological remains; this requires a staged process of evaluation and modelling of deposits and impacts to inform the determination of applications / EIA and design and mitigation, with sufficient time and resources to undertake and write up and publish the archaeological work that will be necessary if this site is taken forward.

Historic England question the associated development area's impact upon Gorse Hill / Neatfold Hill which appears an area of higher archaeological risk and landscape sensitivity – if the facilities are ancillary to the reservoir do they necessarily need to be at this location and do they have the same weight of justification as the reservoir itself. This comment relates to both the pink and grey area.

There are likely to be known and unknown non-designated heritage assets within the footprint of the proposed scheme, some of which could be of equivalent significance to a designated asset. Non-designated archaeology could vary widely from find-spots of artefacts to structural remains, paleoenvironmental evidence and locally listed buildings.

Limited archaeological work has previously been carried out in this area, and we know relatively little about the archaeological potential here. However, it should be noted that absence of evidence is not evidence of absence, and this does not mean that the archaeological potential or significance of the area is low.

4.1

27 Actions and Recommendations – The Historic Environment is not included.

Appendix A: Gate two actions and recommendations

Actions

There is no reference to the actions required in relation to the historic environment. Is 8 a reference? Clarification is needed.





Recommendations

7 Environment. Measures welcomed, in particular the detailed Landscape and Visual Impact Assessment but again the historic environment is not referenced.

Appendix B: Gate one actions and recommendations

Further assessment for the historic environment is not referenced.

The following, although not exhaustive, is recommended:-

- Detailed Heritage Impact Assessment of chosen option.
- LVIA work to assess impact and identify site specific heritage, landscape and mitigation measures.
- Archaeological Assessment including desk-based assessment and deposit model. The deposit model should inform the selection of the geophysical techniques.
- At present there are many unknowns relating to undesignated archaeology. Consequently, it cannot be assessed if potential mitigations and future work programmes are appropriate. To ensure that appropriate mitigations can be developed it should be ensured that archaeological assessment (including intrusive investigations) are commenced as early in the program as practicable to help inform the detailed design of the reservoir and associated infrastructure. It should also be ensured that investigations are appropriately sequenced to ensure an iterative process which allows for informed decision taking.
- Opportunity should be provided for a geoarchaeologist to be involved in any geotechnical investigations occurring at the site.

PR19 Final Determinations: Strategic regional water resource solutions appendix

Again our previous responses and the historic environment are not referenced.

Next steps

Notwithstanding the advice given in this letter, we reserve the right at a later stage to comment or object to any proposals that come forward as part of the SLR process.

Overall, Historic England, as the Governments advisor on the historic environment, raise very strong concerns that our previous comments relating to the historic environment at the site proposed have not been incorporated.






Historic England

We hope that the above comments are of assistance. Please do not hesitate to contact me to discuss,

Yours sincerely



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