

# **Boston Alternative Energy Facility**



## **Statement of Common Ground between Alternative Use Boston Projects Limited and Historic England**

**Planning Inspectorate Reference Number: EN010095**

**Date: February 2022**

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**\*THIS PAGE IS TO BE REMOVED FROM FINAL VERSION OF THE DOCUMENT\***

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### Reviewer List

Name	Role
Sophie Reese	Senior Associate, BDB Pitmans

### Approvals

Name	Signature	Role	Date of Issue	Version
Paul Salmon	PS	PM	13/12/21	1
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## **1 Introduction**

### **1.1 Purpose of the Statement of Common Ground**

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the Development Consent Order (DCO) application for the proposed Boston Alternative Energy Facility (the Facility) made by Alternative Use Boston Projects Limited (AUBP) to the Planning Inspectorate under section 37 of the Planning Act 2008 (Planning Act).
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application Documents. All documents are available on the Planning Inspectorate website.
- 1.1.3 The SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties named in **Section 1.3**, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.
- 1.1.4 It may be subject to further updates and revisions during the examination process.

### **1.2 Description of the Proposed Development**

- 1.2.1 The Facility covers 26.8 hectares (ha) and is split in to two components: the area containing operational infrastructure for the Facility (the 'Principal Application Site'); and an area containing habitat mitigation works for wading birds (the 'Habitat Mitigation Area'). The Facility will generate power from Refuse Derived Fuel (RDF) with the 'thermal treatment' process for generating power converting the solid fuel into steam, which is then used to generate power using steam turbine generators. It will have a total gross generating capacity of 102 megawatts electric (MWe) and it will deliver approximately 80 MWe to the National Grid. The Facility will be designed to operate for at least 25 years, after which it may be decommissioned.
- 1.2.2 The Principal Application Site covers 23.5 ha and is located at the Riverside Industrial Estate, Boston, Lincolnshire. This site is next to the tidal River Witham (known as The Haven) and downstream from the Port of Boston. The Habitat Mitigation Area covers 1.5 ha and is located approximately 170 m to the south east of the Principal Application Site, encompassing an area of saltmarsh and small creeks at the margins of The Haven.

### 1.2.3 The main elements of the Facility will be:

- Wharf and associated infrastructure (including re-baling facility, workshop, transformer pen and welfare facilities);
- RDF bale storage area, including sealed drainage with automated crane system for transferring bales;
- Conveyor system between the RDF storage area and the RDF bale shredding plant, part of which is open and part of which is under cover;
- Bale shredding plant;
- RDF bunker building;
- Thermal Treatment Plant comprising three separate 34 MWe combustion lines and three stacks;
- Turbine plant comprising three steam turbine generators and make-up water facility;
- Air-cooled condenser structure, transformer pen and associated piping and ductwork;
- Lightweight aggregate (LWA) manufacturing plant comprising four kiln lines, two filter banks with stacks, storage silos, a dedicated berthing point at the wharf, and storage (and drainage) facilities for silt and clay;
- Electrical export infrastructure;
- Two carbon dioxide (CO<sub>2</sub>) recovery plants and associated infrastructure;
- Associated site infrastructure, including site roads and car parking, site workshop and storage, security gate, and control room with visitor centre; and
- Habitat mitigation works for Redshank and other bird species comprising of improvements to the existing habitat through the creation of small features such as pools/scrapes and introduction of small boulders within the Habitat Mitigation Area.

## 1.3 Parties to this Statement of Common Ground

1.3.1 This SoCG has been prepared in respect of the Facility by (1) AUBP, and (2) Historic England, together the Parties.

1.3.2 **AUBP** is a privately-owned company, established for the purpose of securing development consent for the Facility and then developing and operating the Facility. The company team has been involved in industrial development at the site in Boston, Lincolnshire since 2004.

1.3.3 **Historic England** is the government's expert advisor on England's heritage. Historic England is a statutory consultee under the Planning Act, 2008 (the 2008 Act) and offers advice to local planning authorities, government departments, developers and owners on development proposals affecting the historic environment. Historic England's advice is shaped by legislation and based upon government policy and guidance. Historic England's advice is also

underpinned by their published best practice, ‘Conservation Principles, Policies and Guidance’.

## 1.4 Terminology

1.4.1 In **Table 3-1** in the Issues section of this SoCG:

- a) “Agreed indicates area(s) of agreement;
- b) “Under discussion” indicates area(s) of current disagreement where resolution remains possible, and where parties continue discussing the issue to determine whether they can reach agreement by the end of the examination; and
- c) “Not agreed” indicates a final position for area(s) of disagreement where the resolution of divergent positions will not be possible, and parties agree on this point.

1.4.2 It can be assumed that any matters not specifically referred to in the Issues section of this SoCG are not of material interest or relevance to Historic England and therefore have not been the subject of any discussions between the parties. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to Historic England.

## 2 Overview of Previous Engagement

2.1.1 A summary of the meetings and correspondence undertaken between the Parties in relation to the Facility is outlined in **Table 2-1** below, this is also shown in **Appendix A**.

2.1.2 It is agreed that this is an accurate record of the key meetings and consultation undertaken between the Parties in relation to the issues addressed in this SoCG.

**Table 2-1 Engagement activities between AUBP and Historic England**

Date	Form of contact/correspondence	Key topics discussed and key outcomes
10 July 2019	Letter	Section 42 response.
4 October 2019	Meeting	Meeting to discuss approach to archaeological evaluation and mitigation for the project. No meeting minutes available.
23 July 2021	Email	Email with Archaeological Mitigation Strategy note attached.
9 August 2021	Meeting	Meeting to discuss Historic England, Lincolnshire County Council and Boston Borough Council Relevant Representations.
21 October 2021	Telephone followed by Email	Call to discuss the weather difficulties faced on site during the borehole survey and the

Date	Form of contact/correspondence	Key topics discussed and key outcomes
		<p>acquisition of three (rather than the planned four) boreholes. Based upon the results, showings significant depths of alluvium, and the recommendations of the contractor that the fourth borehole was unlikely to show anything different, it was agreed that three would be sufficient at this time. Further information will be captured during the planned, scheme wide geotechnical survey post-consent. Email sent to confirm outcome of call and to request written approval of acceptance of approach.</p>
09 November 2021	Email	<p>Email sent as a reminder to request written approval of acceptance of approach.</p>
22 November 2021	Email	<p>Email sent as a reminder to request written approval of acceptance of approach.</p>
26 November 2021	Telephone followed by Email	<p>Call to request written approval of acceptance of approach. Followed by receipt of email confirming that a fourth borehole would not be essential at this time.</p>
29 November 2021	Email	<p>Update on programme for receipt of Geoarchaeology report from Wessex and request for meeting to discuss the results and next steps for archaeological requirements in early January (meeting subsequently scheduled for 6th January)</p>
20 January 2021	Meeting	<p>Meeting to discuss the results of the geoarchaeological borehole survey and assessment and next steps regarding the implementation of the phased approach to archaeological mitigation. Given the depths of alluvium overlying deposits with archaeological potential, the scope of any further archaeological evaluation and mitigation works will need to be considered when the below-ground impact of proposed development are known. This will follow the planned, scheme wide geotechnical survey, which will incorporate geoarchaeological objectives, post-consent.</p>

## 3 Issues

### 3.1 Introduction and General Matters

- 3.1.1 This document sets out the matters which are agreed, not agreed, or are under discussion between Historic England and AUBP.
- 3.1.2 On 17 August 2021, the Examining Authority issued a letter under Section 88 of the Planning Act and Rules 4 and 6 of The Infrastructure Planning (Examination Procedure) Rules 2010 (known as the 'Rule 6 Letter'). Annex E of the Rule 6 Letter set out a request for SoCGs between AUBP and various parties, including Historic England. For Historic England the Rule 6 Letter advises that the following issues should be in the SoCG:
- a) Outline Written Scheme of Investigation
  - b) Geoarchaeological analysis
  - c) Impacts of piling
- 3.1.3 The Rule 6 Letter also advises that all of the SoCGs should cover the Articles and Requirements in the draft Development Consent Order and that any Interested Party seeking that an Article or Requirement is reworded should provide the form of words which are being sought in the SoCG.
- 3.1.4 **Table 3-1** details the matters which are agreed, not agreed and under discussion between the Parties, including a reference number for each matter.



**Table 3-1 Issues (as per Historic England’s Relevant Representation RR-027)**

SoCG Reference	Document Reference	Topic	Historic England’s Comment	AUBP’s Comments	Status
1.0 Outline Written Scheme of Investigation (OWSI)					
HE 1.1	Outline Written Scheme of Investigation document reference 7.3, APP-122)	Outline Written Scheme of Investigation amendments	<p>HE notes some changes to the OWSI including:</p> <ul style="list-style-type: none"> <li>• further information should be included around an iterative approach to borehole sampling and analysis;</li> <li>• a geoarchaeologist should be involved in borehole methodology and there may need to be specific geoarchaeological boreholes; and</li> <li>• comments on the requirements for a monitoring scheme.</li> </ul>	The Outline WSI has been updated to capture HE’s advice and is available at document reference 7.3(1), REP1-012.	HE agrees.
2.0 Piling Design					
HE 2.1	Chapter 8 Cultural Heritage (document reference 6.2.8, APP-046)	Piling	HE recommend that consideration is given to the principles and procedures outlined in Historic England’s 2019 guidance ‘Piling and Archaeology: Guidance and Good Practice’.	The good practice guidance has been referenced in the updated Outline WSI (document reference 7.3(1), REP1-012) alongside details of how this, and other good practice guidance, will	HE agrees.

SoCG Reference	Document Reference	Topic	Historic England's Comment	AUBP's Comments	Status
				inform an iterative design process and the development of the archaeological mitigation strategy following further investigation and consultation.	
3.0 Draft DCO					
HE 3.1	Draft DCO (document reference 2.1, APP-005)	Draft DCO	The articles and schedules in the draft DCO relevant to HE's interests are appropriate for the Proposed Development.	AUBP agrees.	HE agrees.
HE 3.2	Draft DCO (document reference 2.1, APP-005)	Requirements	The requirements set out in Part 1 of Schedule 2 relevant to HE's interests provide a suitable framework for securing the necessary and relevant environmental mitigation measures and other environmental control measures.	AUBP agrees.	HE agrees.



## 4 Agreement of this Statement of Common Ground

### 4.1 Statement of Common Ground

4.1.1 This Statement of Common Ground has been prepared and agreed by the Parties.

Signed.....  
[NAME]  
[POSITION]  
on behalf of Alternative Use Boston Projects Limited  
Date: [DATE]

Signed.....  
[NAME]  
[POSITION]  
on behalf of Historic England  
Date: [DATE]



## Appendix A Previous Engagement

DRAFT



Ms Bethan Griffiths  
Alternative Use Boston Projects Ltd  
RTLY-RLGH-GKSE FREEPOST  
25 Priestgate  
Peterborough  
PE1 1JL



Our ref: PA00999711

Your ref: -

10 July 2019

Dear Ms Griffiths

**BOSTON ALTERNATIVE ENERGY FACILITY, RIVERSIDE INDUSTRIAL ESTATE,  
BOSTON, LINCOLNSHIRE**

Thank you for letter of 19 June 2019 consulting us on the Preliminary Environmental Information Report for the Boston Alternative Energy Facility.

**Advice**

Our previous pre-application advice is well reflected within the Preliminary Environmental Information Report. The scope of archaeological impacts to be considered is well framed although we should add that there may be additional scope for remains of historic vessels repurposed to form backside revetments or wharfs to exist.

In weighing applications that directly affect non-designated heritage assets, the NPPF requires a balanced judgement which has regard to the scale of any harm or loss of the heritage asset (paragraph 197). Part of this balance should be to, where possible, avoid or minimise the impact on heritage assets and then where avoidance is not possible mitigate. The current Preliminary Environmental Information Report does not fully examine the options for reducing the harm arising from the development which may include the repositioning of a development or its elements, or changes to its design i.e. can redesign remove the need to remove a section of the Roman Bank or reduce the length of the section which needs to be removed, or can the reposition of taller elements of the development reduce the impact on views to the Parish Church of St Nicholas. For some developments, the design of a development may not be capable of sufficient adjustment to avoid or significantly reduce the harm, however the works which have led to this conclusion should be demonstrated.

As this application may also require a marine licence, Historic England would recommend that when it is submitted, the marine licence application is supported by the agreed WSI, and sufficient cultural heritage information (e.g. the cultural heritage chapter of the ES). This will allow Historic England staff (who are a statutory consultee to the Maritime Management Organisation licence process) to rapidly respond to this application. The absence of this information is likely to lead to delays.



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6888





We also strongly recommend that you involve the Conservation Officers of the relevant local authorities and the archaeological staff at Lincolnshire County Council in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Thank you for consulting us at the Preliminary Environmental Information Report stage.

Yours sincerely



Alison MacDonald  
Assistant Inspector of Ancient Monuments



**BOSTON ALTERNATIVE ENERGY FACILITY, RIVERSIDE INDUSTRIAL ESTATE,  
BOSTON, LINCOLNSHIRE  
Pre-application Advice**

**List of information on which the above advice is based**

- Introducing the Boston Alternative Energy Facility leaflet; and
- Preliminary Environmental Information Report.



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6888



## Note / Memo

**HaskoningDHV UK Ltd.  
Industry & Buildings**

To: Jan Allen (LCC), Matthew Nicholas and Tim Allen (Historic England), Denise Drury (Heritage Lincolnshire)  
From: Victoria Cooper  
Date: 21 July 2021  
Copy: Paul Salmon  
Our reference: PB6934-RHD-ZZ-XX-NT-Z-4013  
Classification: Project related  
Checked by: Paul Salmon

**Subject: Boston Alternative Energy Facility (BAEF) Archaeological Mitigation Strategy**

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## 1 Purpose of Note

Relevant Representations have been received from Lincolnshire County Council (LCC) and Boston Borough Council (BCC) regarding the assessment of cultural heritage with regard to the proposed BAEF. A specific area of concern raised by LCC is that a field survey in the form of trial trenching has not yet been undertaken and that this would be considered essential to inform their advice on the application. Given the level of detail in the desk-based assessment, geophysical survey report, EIA chapter and the Outline Written Scheme of Investigation (WSI) submitted with the application this note has been prepared to set out only the key information which has informed our proposed mitigation strategy relating to buried archaeology. The intention is to set out a streamlined summary to provide additional clarity on the reasoning behind our recommended approach to inform further consultation with cultural heritage stakeholders (Historic England, Lincolnshire County Council, Boston Borough Council (Heritage Lincolnshire)).

## 2 Desk-based Assessment

The desk-based assessment demonstrates the following:

- With the exception of The Roman Bank earthwork, there are no known heritage assets within the order limits
- The potential for unknown/potential buried archaeological remains (RHDHV96) to be present is associated with:
  - potential foreshore remains (paleoenvironmental and archaeological) within the Haven mud banks (RHDHV91)); and
  - Prehistoric peat (c. 8m below the surface as seen during works for the Boston Barrier dated to the Neolithic) overlain by historic alluvium (RHDHV66).
- No archaeological features or artefacts were revealed during trial trenching for the adjacent Biomass UK No. 3 facility. Trenches were dug to c. 2m deep and then all but one trench were deepened to beyond 2m, to determine the range of deposits. The deepest deposit encountered in the machine cut sondages was a plastic dark grey clay with organic traces, which may represent a period when vegetation was able to grow on a possibly Roman land surface, overlain by post-Roman alluvial deposits indicative of marine inundation;

- Alluvial build up is evident throughout the local area, seen within the deposit mapping undertaken as part of the desk-based assessment, where all boreholes reviewed showed the local geology is made up of anywhere from 5 m to 11 m of alluvium;
- Based on this data and historical evidence:
  - Peat deposits within these alluvial layers have been dated to the Neolithic period suggesting the area consisted of significant wetland during the period.
  - during the Saxon period the Lincolnshire fens appear to have suffered extensive flooding and deposition of marine silts over much of the fen basin; and
  - through the medieval period, a lot of the fenland was reclaimed, with the construction of drainage channels and flood defences.

### 3 Field Evaluation (Geophysical Survey)

The field evaluation carried out to inform the assessment (geophysical survey undertaken by Magnitude Surveys comprising the acquisition of both magnetic and electromagnetic data) shows that:

- The survey environment presented some challenges for the fluxgate magnetometer survey with the presence of salts and the wetting and drying action of the tide producing iron oxides with strong magnetic properties. Despite this, some anthropogenic anomalies are apparent in the magnetic data and are generally interpreted as more recent interventions related to drainage and development including a canalised or recently ploughed-out stream;
- In contrast the electromagnetic survey responded well to the survey environment with the data characterised by strong responses interpreted as agricultural features such as drains and a possible field boundary and strong responses for more deeply buried palaeochannels and clay deposits are also identifiable;
- spreads of ferrous debris have been identified in the north and centre of the survey area and it is likely that these are areas of made ground, related to the industrial usage of the surrounding areas and ongoing development;
- Overall, the results do not suggest the presence of significant or extensive archaeological features, but there are areas of potential interest as follows:
  - Two discrete anomalies in the west of the survey area have been identified as possible localised burning or firing, as they exhibit a characteristic double-peak signal and it is possible that these might be related to salt production activity, as the survey area is within a saline environment; however, it is equally likely that these anomalies are modern in origin, due to their location close to a spread of ferrous debris;
  - A further series of weak linear anomalies in the southwest have been detected forming a right angle, and could possibly be a field system;
  - The EM results suggest that a former and now buried landform in the shape of a ridge, cutting across the north east corner of the survey area might relate to, or have formed the basis of, the embankment shown on historic maps, which has been dated to the late Saxon period; and
  - The EM results also contain evidence of former landscapes, with a possible palaeochannel identified and patches of differences in local conductivity which may relate to local differences in the texture of the sediments close to the surface.



## 4 Proposed Archaeological Mitigation Strategy (Outline WSI)

While the results of the above show a “complicated coastal landscape with evidence of recent and past management and reclamation in the form of drains and ground consolidation” equally “the results do not suggest the presence of significant or extensive archaeological features”.

Although the presence of archaeological remains cannot be ruled out, the key conclusions of the desk-based assessment and geophysical survey, combined with the significant depths of alluvium within the site, indicate that speculative trial trenching would have limited success in encountering any such remains given the depths achievable through trial trenching. Rather, given the nature of the natural deposits encountered in the adjacent Biomass UK No. 3 facility, and the features which are indicated by the geophysical data, geoarchaeological recording and palaeoenvironmental analysis of samples acquired from boreholes (as part of planned ground investigations post-consent) represents a key information gathering phase in the process of determining an appropriate and proportionate mitigation strategy.

As an alternative to pre-consent trial trenching, and in order to maximise the potential for successfully encountering archaeological features during planned investigations, we are proposing an iterative, phased approach to be undertaken post-consent, continuing on from the pre-consent assessment and evaluation.

The Outline WSI submitted along with the DCO application proposes the following strategy for post-consent (pre-construction) investigation and mitigation:

- Phase 1: a programme of geoarchaeological monitoring and assessment (boreholes) to be undertaken alongside planned ground investigations for the project, the scope of which will be agreed with the cultural heritage stakeholders, and specifically the Historic England Science Advisor for the East Midlands; and
- Phase 2: following the geophysical survey and geoarchaeological assessment, if warranted (and considered appropriate and proportionate by stakeholders) a phase of targeted trial trenching would be undertaken to ‘ground-truth’ the combined results and further inform Phase 3;
- Phase 3: dependent upon the final detailed design and construction methodology for the facility (should consent be granted) a programme of pre-construction set-piece excavation and/or archaeological monitoring/watching briefs during construction would be agreed in consultation with stakeholders.

In addition to these phased works relating to the potential for buried archaeology, archaeological monitoring and investigation of the ‘Roman Bank’ and options for publication and heritage interpretation to inform and educate the public about the history of the local area (such as public information boards) are also proposed in the Outline WSI. Embedded mitigation to mitigate the effects of setting impacts will also require further consideration as part of the final design, in consultation with cultural heritage stakeholders.

## 5 Consultation and Agreement on the Approach

We recognise that following submission of the draft outline WSI to cultural heritage stakeholders and a subsequent meeting in October 2019, project pauses and interruptions to ongoing communications during 2020, associated with the Covid-19 pandemic, have meant that further detailed consultation has not been achieved prior to submission.

However, formal consultation on this approach is planned as part of the examination process and we welcome ongoing consultation to agree the approach.

## Minutes

**HaskoningDHV UK Ltd.  
Industry & Buildings**

**Present:** Paul Salmon (PS), Abbie Garry (AG) and Vic Cooper (VC) (Royal HaskoningDHV), Denise Drury (DD) (Heritage Lincolnshire), Tim Allen (TA) and Matthew Nicholas (MN) (Historic England (HE)) and Jan Allen (JA) (Lincolnshire County Council (LCC)).

**Apologies:**

**From:** Abbie Garry

**Date:** 9<sup>th</sup> August 2021

**Location:** Teams

**Copy:**

**Our reference:** PB6934-RHD-ZZ-XX-MI-Z-1081

**Classification:** Project related

**Enclosures:**

**Subject:** **Boston Alternative Energy Facility Cultural Heritage Meeting 09.08.21**

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<b>Number</b>	<b>Details</b>	<b>Action</b>
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**1**

### **Introduction**

PS noted that:

- examination will be mostly virtual;
- there will likely be two preliminary meetings (PMs) on 28<sup>th</sup> September with the second on 7<sup>th</sup> October;
- the Rule 6 letter will be received w/c 16<sup>th</sup> August; and
- there will likely be one face to face open floor hearing.

*Post meeting note: the Rule 6 letter is [here](#), published on 17<sup>th</sup> August.*

**2**

### **Summary of Relevant Representations (RR)**

VC summarised previous consultation including a meeting in 2019 where it was agreed to take forward the geophysical survey and make updates to the Outline Written Scheme of Investigation (OWSI). VC noted due to project delays and Covid-19, full consultation was not able to be progressed prior to application submission.

#### **Historic England's (HE's) RR**

VC noted that HE's RR focussed on the value of the geoarchaeological work and requested further detail on how it would be approached within the WSI. VC noted the RR mentioned ensuring geoarchaeological involvement in planning the post consent ground investigations.

VC confirmed that this was the strategy that would be put in place, but this will be made clearer in updates to the OWSI.

Number	Details	Action
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VC has noted reference to HE guidance on deposit modelling and piling, and the preservation of archaeological remains which includes wetland areas. Therefore, updates will be made in terms of recent guidance.

VC noted the approach to archaeology will come out of the discussion on evaluation and how it integrates with the overall strategy.

TA noted that the OWSI will be required by the Local Planning Authority (LPA) to discharge the requirements within the Development Consent Order (DCO). TA mentioned that where investigations are post consent, there should be clarity within the OWSI on what the final WSI will be addressing.

VC noted that there would be further detail added within the OWSI, including the commitments required and the process for demonstrating how the conditions are discharged should be included.

**Lincolnshire County Council's (LCC's) RR**

VC noted LCC's RR that the geophysical survey should have been followed by trial trenching prior to submission of the application, and therefore there is a lack of information for informed planning recommendations.

VC noted a note had been circulated on the reasons why trial trenching was proposed post consent and following geoarchaeology.

**Boston Borough Council's (BBC's) RR**

VC mentioned that BBC's response included comments on cultural heritage and the focus on public interpretation and appreciation of the environment. VC also noted views from Boston Stump.

**3 Approach to Evaluation**

VC summarised the note circulated on the mitigation strategy. VC noted the purpose of the note was to provide streamlined information on how the strategy was formed.

VC summarised the strategy which included:

- Phase 1 within the OWSI comprised of a programme of geoarchaeological monitoring and assessments,

Number	Details	Action
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including geoarchaeology advice in planning the investigations and including targeted geoarchaeological investigations, informed by the geophysical survey to understand the ground conditions;

- Phase 2 is trial trenching if shown to be appropriate based on the geophysical survey and geoarchaeological assessment; and
- Phase 3 which is dependent on detailed design and construction methodology, which would include set-piece excavation, archaeological monitoring/ watching briefs during construction – but this depends on the results of the evaluation.

VC noted the comments in the RRs were about when this takes place. VC stated that we are proposing this to be done post consent due to the programme of ground investigations which is planned post consent. VC noted the evaluation would be better informed by having the geoarchaeological investigations done first.

VC suggested that, as the results of the desk-based assessment and geophysical survey do not suggest the presence of significant or extensive archaeological features, the risk to the project of encountering such remains would be limited.

JA noted we aren't in a place to fully understand that there is no significant archaeology.

VC mentioned that we know there is potential for remains but the ability to identify and target this is difficult due to the amount and depths of alluvium.

VC noted that the trial trenching at Boston Biomass No. 3 revealed only alluvium and no archaeological remains.

JA confirmed we are in agreement in terms of the process [of geoarchaeology and then trial trenching]. JA noted less than half of the site had the geophysical survey, and noted that 'we don't know enough'.

VC noted that in terms of the work currently done, we can make a judgement that there are no extensive archaeological sites here although it is agreed that the potential for archaeological material to be present cannot be ruled out.

Number	Details	Action
	<p>VC showed the areas of geophysical survey were the open areas of the site, whereas other areas are covered by existing facilities. VC noted that the geophysical survey has shown that we wouldn't be able to find out anything more with evaluation at this stage.</p> <p>JA noted there was 12.7 hectares (ha) of the 26.8 ha site geophysical survey undertaken. JA noted there should be sufficient evaluation before submission.</p> <p>JA noted that they would be consistent in the advice based on guidance and policy.</p> <p>VC confirmed there would be a whole suite of ground investigations post consent which would cover the whole site.</p> <p>VC noted there are specific features such as a palaeochannel and field boundary, therefore, if we could agree with the client taking forward 2-4 boreholes sooner, rather than waiting for the Ground Investigation (GI) that could be a potential solution.</p> <p>MN noted it was important to have a synergy between the geotechnical investigation and geoarchaeology.</p> <p>TA noted that issues should be dealt with before the examination hearings.</p> <p>PS noted that we need to consider the timescale we've got left and we could do something now which would provide information within the examination.</p> <p>MN asked for further information on the wharf area.</p> <p>VC noted that the approach to assessment and geotechnical investigation would be different for the intertidal/subtidal area compared to the onshore assessments. VC stated we don't have details on how the geotechnical investigation will be carried out for the wharf area.</p> <p>AG noted we would need to check details of geotechnical investigation for the wharf area within the draft DCO. <i>Post meeting note, the draft DCO includes Requirement 9 stating "No part of the authorised development may commence until intrusive geotechnical and geo-environmental phase investigations have been carried out". The wharf area is not specified separately.</i></p>	

Number	Details	Action
	<p>VC noted they could liaise with MN on locations and could plan some boreholes in the onshore area, with a view to undertake larger scale investigations at a later date.</p>	
	<p>DD asked what details we have of the GI works.</p>	
	<p>VC confirmed we don't have locations of where the boreholes are going and what the engineering designed GI will be.</p>	
	<p>DD noted that the borehole locations would be for the engineering purpose rather than geoarchaeology.</p>	
	<p>VC mentioned that boreholes located for geoarchaeological purposes could also be used for geotechnical information.</p>	
	<p>VC noted action on considering a proposal of boreholes to take to the client. VC noted timescales would be considered for the WSI, and if the boreholes were undertaken a smaller WSI would be needed to inform the process.</p>	<p>VC to consider proposal of boreholes and discuss with the client.</p>
	<p>VC noted if boreholes are going to be undertaken now the OWSI would need to be updated to reflect that strategy.</p>	
	<p>JA mentioned that the geophysical survey suggested some archaeology could be masked.</p>	
	<p>VC noted the trenches at the Boston Biomass Facility which is adjacent to the site. The trenches went to 2 m and extended half of those to 4 m, which showed mostly alluvium, although there was a layer with organic material (roots) at depth suggesting a previous land surface.</p>	<p>VC to send over details of Boston Biomass trial trenching.</p>
	<p>TA noted that although you can extrapolate to an extent from the adjacent site, there could still be defined areas of paleochannels and creeks.</p>	
	<p>VC noted it would be useful to understand the depths of the deposits before doing trial trenching.</p>	
	<p>JA asked what the maximum impact depth would be.</p>	
	<p>PS noted we don't currently have this information but we could find out if it is available at this stage. PS noted we would need client signoff on the proposed plan for boreholes.</p>	<p>PS to confirm if we have information on maximum impact depth.</p>

Number	Details	Action
4	<p>DD noted that the OWSI seemed to imply that trenching wouldn't be necessary following other pieces of work. DD noted upper deposits would need to be checked.</p> <p>VC noted the wording would be made clearer within the OWSI.</p> <p>PS mentioned we would be seeking Statements of Common Ground (SoCG) through the various organisations (LCC/BBC).</p> <p><b>Mitigation</b></p> <p>VC noted mitigation would need to be fully considered when evaluation has been undertaken.</p> <p><i>BBC Mitigation Suggestions (public interpretation/ landscaping)</i></p> <p>VC noted that there is a commitment in the OWSI on including publication, heritage boards etc., but currently we don't have details on what that would look like, as this would be determined with consultation with stakeholders and the final design process.</p> <p>VC mentioned we don't have the details on physically how the mitigation could be done, for example boards, or a heritage trail, however we could look at options.</p> <p>PS noted if there were specifics on what could be done, this could be considered within the Section 106 agreement.</p> <p>DD mentioned public art projects in the area including a focus on heritage.</p> <p>DD asked if there is consideration for schools.</p> <p>PS confirmed there will be provision for schools visiting and there could be a provision of information on heritage. PS noted would discuss this within the legal agreement.</p> <p>JA mentioned that there are opportunities for creative digital ways to engage with the public.</p> <p>PS noted the Section 106 agreement would be in consultation with stakeholders.</p> <p><i>Boston Stump</i></p> <p>VC mentioned there was a comment from BBC on the predominance of the Facility within views from Boston Stump.</p>	<p>PS to discuss heritage aspects of Section 106 agreement with lawyers.</p>

Number	Details	Action
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DD noted this was considered at previous meetings but it wasn't considered by DD for the relevant representation.

PS mentioned that there are significant effects predicted in the Landscape and Visual Impact Assessment, however this is within a current industrial landscape with a current biomass facility and pylons.

VC noted that within the settings assessment the Facility was not considered to be a concern in affecting the significance of the Stump as a heritage asset. VC mentioned the point was more related to the landscape and visual impact assessment rather than the heritage assessment.

TA mentioned GPA 3 setting of heritage assets should be considered.

VC noted the GPA 3 guidance was followed for considering the contribution setting makes to significance.

5	<b>Conclusions/ Next Steps</b>	
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VC stated we would come back with a proposal on the boreholes if the client approves the work.

VC noted the OWSI won't be updated until the boreholes aspect is determined. The separate WSI and method statement for the additional boreholes would be developed with MN.

*Statements of Common Ground*

PS noted SoCG are currently being written and will be based on the RRs prepared. PS mentioned we would like to have draft SoCG progressed prior to examination.

PS noted that for the local authorities the subjects will be split up.

PS mentioned there isn't currently a timetable but that we are in discussions with BBC and LCC.



**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Boston AEF Geoarchaeology  
**Date:** 26 November 2021 11:23:19

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Dear Vic,

Thanks for giving me the rundown of situation. I think the approach you've outlined with regards to BH3 sounds appropriate.

I look forward to seeing the report in due course.

All the best,  
Matt

Matt Nicholas  
Science Advisor (East Midlands)  
National Specialist Services Department  
Historic England, The Foundry, 82 Granville Street, Birmingham, B1 2LH  
[REDACTED]



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**From:** Vic Cooper [REDACTED]  
**Sent:** 21 October 2021 15:10  
**To:** Nicholas, Matthew [REDACTED] >  
**Cc:** Paul Salmon [REDACTED]; Abbie Garry [REDACTED] >; Royal  
HaskoningDHV PB6934 Boston Efw [REDACTED]  
**Subject:** Boston AEF Geoarchaeology

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Hi Matt,

Good to talk just now.

As discussed, Wessex completed three of the four boreholes due to the conditions on site which can be preliminarily described as follows.

BH1 - refusal at 6.50m bgl in sands and gravels; above that a generally sandy alluvium typical of estuarine alluvium but with a thin peat unit towards the base (5.77-5.88m bgl; we've retained that core). No obvious finds/lithostratigraphic units (e.g. buried soils) associated with the targeted earthwork. Upper part of the alluvial is less sandy (presumably a greater freshwater influence).

BH2 - sandy alluvium with occasional organic inclusions; no distinct peat or organic-rich units. Upper part of the alluvial is less sandy. Sands and gravels at base (6.62m bgl). No obvious material in the upper part of the core associated with burning.

BH4 - again a sandy alluvium typical of estuarine alluvium, going on to sands and gravels at base.

As you can see, a remarkably consistent geology!

BH3 was the second planned location within the area of the palaeo-channel and Wessex have suggested, that on balance, the objectives of the campaign will not be compromised by not having the fourth borehole. A return to the site is unlikely to tell us anything more at this time. Also, this is the area in which the Geotech investigations will be carried out post-consent so will have an opportunity to gather data here again in due course.

Also as discussed, we will send the report on to yourself, Jan and Denise once Wessex have completed their work, and we can then look to arrange a call to discuss the results and planning for the next phase.

If you could confirm you are happy with the above approach, or if you have any queries, please do let me know.

Best wishes

Vic

**Victoria Cooper MCI(A)**  
**Senior Marine Heritage Consultant**  
**Royal HaskoningDHV**

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**From:** Vic Cooper

**Sent:** 29 November 2021 12:24

**To:** Jan Allen [REDACTED] >; Denise Drury  
[REDACTED]; Nicholas, Matthew  
[REDACTED] >

**Cc:** Paul Salmon [REDACTED]

**Subject:** Boston AEF - Proposed Update Call (January)

Hi all,

I hope you are all well.

We are expecting the report from Wessex detailing the results of the borehole survey this week and it is our intention to complete all required review etc for formal submission at Deadline 4 of the examination (13<sup>th</sup> December). We will also send this to you directly at the same time, and earlier if we can.

As I realise that trying to fit in a review and further discussion prior to Christmas would be unrealistic, I wonder if we could set up a call as early as possible in January to go through the results and consider next steps.

To this end, could you possibly let me know of your availability w/c 3<sup>rd</sup> and w/c 10<sup>th</sup> January?

Many thanks

Vic

**Victoria Cooper MCIfA**  
**Senior Marine Heritage Consultant**  
**Royal HaskoningDHV**

[REDACTED]  
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## Appendix B Glossary

Term	Abbreviation	Explanation
Alternative Use Boston Projects Ltd	AUBP	The Applicant.
Development Consent Order	DCO	The means for obtaining permission for developments of Nationally Significant Infrastructure Projects (NSIP)
Habitat Mitigation Area	-	A 1.5 ha located approximately 170 m to the south east of the Principal Application Site, encompassing an area of saltmarsh and small creeks at the margins of The Haven where habitat mitigation works will be provided.
Habitats Regulations Assessment	HRA	A Habitats Regulations Assessment (HRA) refers to the several distinct stages of Assessment which must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it.
Lightweight Aggregate	LWA	Plant for the manufacture of lightweight aggregate used to produce lightweight concrete products such as concrete block, structural concrete and pavement.
National Site Network	-	Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) in the UK no longer form part of the EU's Natura 2000 ecological network. The 2019 Regulations have created a national site network on land and at sea, including both the inshore and

Term	Abbreviation	Explanation
		offshore marine areas in the UK.
Principal Application Site	N/A	A 26.8 hectare site where the industrial infrastructure will be constructed and operated. It is neighboured to the west by the Riverside Industrial Estate and to the east by The Haven.
Refuse Derived Fuel	RDF	The fuel produced from various types of waste, such as paper, plastics and wood from the municipal or commercial waste stream.
Statement of Common Ground	SoCG	This document.

DRAFT