

**From:** [REDACTED]  
**To:** [Keadby 3](#)  
**Subject:** FW: EN010114 – Keadby 3 Low Carbon Gas Power Station Project historic England Advice our ref PL00728002  
**Date:** 01 February 2022 18:54:03  
**Attachments:** [imageac4f01.JPG](#)

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Application by Keadby Generation Limited for an Order Granting Development Consent for the Keadby 3 Low Carbon Gas Power Station Project.

The Infrastructure Planning (Examination Procedure) Rules 2010 (as amended) – Rule 17 Request for further information related to archaeology and the Applicant's request to adjust the project name from 'Keadby 3 Low Carbon Gas Power Station Project' to 'Keadby 3 Carbon Capture Power Station'

### **EXA's Question 2 under EPR Rule 17**

Dear Sir/Madam

#### **Historic England Advice**

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We have addressed the ExA's EPR Rule 17 Q2 as below, we have followed the question structure as closely as possible.

It was our intention to defer to the expertise of the NLC archaeological curator as memorialised in our SoCG with regards on-site archaeological impacts, since NLC are best placed to comment in detail on those matters. In the knowledge that the applicant was engaged with NLC we had hoped that matters of on-site archaeological evaluation would have by now been resolved. However, in the light of NLC's LIR [REP1-022] we as Government's expert advisor on England's historic environment we are happy to assist the ExA by addressing their question 2.

Historic England is disappointed that the Applicant's approach to archaeology, and especially unknown archaeological remains, as set out in the ES Chapter 15 (Cultural Heritage) [APP-058], including its Appendices [APP[1]093], [APP-094] and [APP-095] and the submitted Outline Written Scheme of Investigation [APP-0163]; <https://infrastructure.planninginspectorate.gov.uk> has failed to address the expert advice provided by NLC's archaeological curator.

Historic England has concerns regarding archaeology, especially in regard to the excavation of trial trenching not having been undertaken at this stage in the Development Consent Order (DCO) process. If the deposits and archaeological remains impacted by the development are not sufficiently characterised at a stage pre-consent, then that characterisation is unavailable to effectively inform the design of archaeological works of mitigation and sequencing of the construction process. The construction process is likely to become fixed in detail and schedule without enough account of the needs for archaeological work.

An understanding of the character of buried remains should include archaeological deposit modelling and targeted spot dating to support a risk-based approach to mitigation of what can in this landscape be complex buried topography including preserved (wet) organic remains and buried land surfaces with associated *in-situ* remains and scatters. The negative impacts of inadequate characterisation of deposits can include important material being unrecognised and

unrecorded in the construction process or such material only being recognised at a point where the demands of construction constrain effective investigation or design adaptation.

Having considered NLC's LIR [REP1-022] we believe the Applicant should (if the ExA considers it reasonably practicable and expedient), commission the second stages of the evaluation recommended in the NLC HER pre-application advice prior to determination of the DCO, as opposed to dealing with this matter by Requirement (should the DCO be made). This will better manage risk to archaeological remains and allow the timing, specification and delivery of both the archaeological mitigation and the construction works to better and more efficiently deliver with the benefit of that understanding.

The remaining stages of evaluation should take/ comprise a scheme of work which targets those points where there is the greatest opportunity to inform the management of the risks set out above through a deposit model understanding of the site and the preservation environment. This approach allows not only risk to significance to be better managed, but it supports an approach more proportionate to the likely importance of remains as one would (on the basis of the recommended pre-consent evaluation) have a clearer idea of their character, date and degree of preservation.

We concur with NLC that the submitted Outline Written Scheme of Investigation [APP-163] "... conflates the undertaking of archaeological evaluation and mitigation works, when the latter cannot be known until the former is completed and properly reported...", as stated by NLC in their LIR [REP1-022] Paragraph 8.3.2); and we concur that individual Written Scheme of Investigation (WSI) for the outstanding evaluation stages should be prepared for the works to be commissioned and undertaken as soon as possible, with a separate WSI for appropriate mitigation being produced once the above evaluation is completed, and prior to the determination of the DCO, as suggested by NLC in their LIR [REP1-022] (Paragraph 8.3.6).

The availability of proper reporting to inform sequential phases of investigation and mitigation is crucial for a proportionate approach to importance consistent with the NPS/NPPF to be achieved. Not only should early investigations be done in a timely manner but to be useful their results need to be analysed and made available to inform the design of subsequent phases of intervention.

Whilst an ideal sequence of archaeological investigation is not always possible, the phased process of pre-consent investigation which NLC outline will be likely to produce significantly better risk control and outcomes. There is a clear public interest in managing the impact of the development upon the finite archaeological resource and in maximising the contribution to public understanding resulting from its recording, analysis and dissemination.

Yours sincerely

Tim Allen

**Tim Allen MA FSA**  
**Development Advice Team Leader (North)**

**Midlands Region**  
**Historic England**

The Foundry, 82 Granville Street, Birmingham B1 2LH



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