

# MEMO

**North  
Lincolnshire  
Council**

**TO: ANDREW LAW, DEVELOPMENT MANAGEMENT**  
**FROM: ALISON WILLIAMS, HISTORIC ENVIRONMENT RECORD**  
**REF: SCO/2020/2**  
**DATE: 04/12/2020**

**SUBJECT: Scoping opinion as to the information to be provided in an Environmental Statement relating to an application for an Order granting Development Consent for the North Lincolnshire Green Energy Park [EN010116], Land south of Flixborough Wharf and south of the Flixborough Industrial Estate**

## SUMMARY OF ADVICE

- Thank you for consulting the HER on this scoping report and the Archaeology and Cultural Heritage topic in particular
- The nature and scale of this proposed development has the potential for permanent direct and indirect affects on designated and non-designated heritage assets and their settings, including known and potential archaeological sites, geo-archaeological deposits and the palaeo-environmental resource
- The HER data obtained in January 2019 and used for this initial scoping report does not cover the entirety of the proposed development area and will require updating for the EIA
- The spatial scope for the assessment of construction and operational effects on designated heritage assets and the Cumulative Effects Assessment should be increased to a minimum radius of 7.5km in line with the ZTV and LVIA
- The technical scope and approach to archaeology is inadequate and will need to include a staged archaeological field evaluation of non-intrusive and intrusive fieldwork to inform an adequate assessment of heritage significance and the EIA process, and to accord with the relevant NPS, NPPF and local planning policies
- The assessment of potential changes to settings of heritage assets and the impact on their heritage significance should be based on the methodology set out in the Historic Environment Good Practice Advice Note 3  
<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets>
- The LVIA should include an additional viewpoint and photomontage of the proposed development from the Flixborough Saxon nunnery Scheduled Monument that can be used to illustrate the heritage settings assessment
- Further comments re the spatial extent and methodology of the archaeology and cultural heritage assessment for the EIA are set out below.

**HISTORIC ENVIRONMENT RECORD (HER) FUNCTION:** To hold, maintain, interpret and manage heritage information, enhancing the understanding of the area's historical development as a distinctive and attractive place. HER information provides source material for interpretation by heritage professionals and for use by community groups and individuals. The HER database is updated as new information about the historic environment is discovered.

The HER also provides advice on development proposals that affect, or may affect, the sites and settings of all heritage assets i.e. designated and non-designated historic buildings, archaeological sites and monuments, and historic places, areas and landscapes. This advice is provided against saved local plan policies and national historic environment policies. See <https://www.northlincs.gov.uk/planning-and-environment/historic-environment-and-conservation/>

**DETAILED ADVICE:** Thank you for consulting the North Lincolnshire HER (NLHER) on this scoping report. I have the following comments to make on the content in relation to Archaeology and Cultural Heritage.

### **Relevant Policy**

The following policies concerning heritage matters are relevant to the proposed development:

**NPS EN-1** for Energy

**NPPF Section 16 Conserving and enhancing the historic environment** (NPPF, 2019) and the National Planning Policy Guidance (NPPG, 2019)

**CS6 Historic Environment** of the North Lincolnshire Core Strategy (2011),

**HE8 – Ancient Monuments**, and

**HE9 – Archaeological Evaluation**, of the North Lincolnshire Local Plan (2003, saved policies)

Guidance on the Applicant's Assessment of the historic environment and heritage assets is set out in paragraphs 5.8.8 – 5.8.10 of NPS EN-1.

*5.8.8 As part of the ES (see Section 4.2) the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset. As a minimum the applicant should have consulted the relevant Historic Environment Record<sup>120</sup> (or, where the development is in English or Welsh waters, English Heritage or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact.*

*5.8.9 Where a development site includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, representative visualisations may be necessary to explain the impact.*

*5.8.10 The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents.*

Core Strategy policy CS6 Historic Environment states that **'The council will seek to protect, conserve and enhance North Lincolnshire's historic environment as well as the character and setting of area of acknowledged importance including historic buildings, conservation areas, listed buildings (both statutory and locally listed), registered parks and gardens, scheduled ancient monuments and archaeological remains.....'**. And **'Development proposals should provide archaeological assessments where appropriate'**.

Where Scheduled Monuments, or sites of equivalent significance, are affected directly or indirectly, Local Plan policy HE8 directs **'Development proposals which would result in an adverse effect on Scheduled [Ancient] Monuments and other nationally important monuments, or their settings, will not be permitted.'**

Local plan policy HE9 Archaeological Evaluation, states

**'Where development proposals affect sites of known or suspected archaeological importance, an archaeological assessment to be submitted prior to the determination of a planning application will be required. Planning permission will not be granted without adequate assessment of the nature, extent and significance of the remains present and the degree to which the proposed development is likely to affect them.'**

**Sites of known archaeological importance will be protected. When development affecting such sites is acceptable in principle, mitigation of damage must be ensured and the preservation of the remains in situ is a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording before and during development.'**

### **Cultural Heritage Baseline**

Our records show that the proposed development has potential for direct and indirect effects on designated and non-designated heritage assets and their settings. These heritage assets include listed buildings, scheduled monuments, known and potential archaeological remains and the palaeo-environmental resource of the underlying stratigraphy. The known archaeological resource ranges in date from pre-historic sites and artefacts, cropmark sites of potential late prehistoric/Romano-British occupation, the Flixborough Anglo-Saxon settlement, Medieval settlement and moated site, through to evidence of the post-medieval drainage and warping of the former low-lying marshland.

The blown sands against the Liassic escarpment were favoured for early settlement with the marshland providing rich resources and trade routes along the Trent. On the east side of the Trent, a number of significant Bronze Age finds have come from the Trent floodplain at Burringham Common including a hoard of rapiers and a spearhead, a superb bronze shield, as well as a hoard of bronze axes from the riverbed at Keadby Bridge.

Archaeological investigations of the floodplain have revealed a stratigraphy beneath the surface made ground comprising alluvial warp overlying well-preserved peat deposits of varying depth and date and in turn overlying the pre-peat land surface; the radiocarbon dates show that the peat began to form intermittently during the Late Neolithic to Early Bronze Age, and that the waterlogged conditions would have continued throughout the Bronze Age through to the era of post-medieval drainage and warping.

All these deposits have potential to contain archaeological remains, ranging in date from the Upper Palaeolithic pre-peat landscape, organic and inorganic artefacts within the prehistoric peats, to the 18th/19th century drainage and warping structures.

### **Scoping Advice**

Section 13 of the Scoping Report sets out the applicant's proposed methodology for the Archaeology and Cultural Heritage assessment.

Baseline data sources (13.3) were accessed in January/February 2019 including the North Lincolnshire HER. The EIA should be based on up to date information obtained from these various historic environment databases, to ensure that any new data is considered. In addition, it is noted that the search area carried out of the NLHER data in January 2019 does not match the current proposed development area, omitting considerable areas of the site to the north and south; the data was supplied in 2019 under a 12 month licence period that has elapsed. An updated search of the NLHER for the entire development area will be required therefore.

Previous fieldwork within the proposed development area is largely localised to specific projects and there are large parts of this landscape and the development area that have not been subject to any detailed archaeological, geo-archaeological or palaeo-environmental investigation.

Given the archaeological potential of the proposed development area and the lack of specific information relating to the significance of known and potential archaeological remains, archaeological field evaluation of the proposed development areas will be required to inform the EIA with the results and technical reports presented in the ES.

With regard to the proposed study area for the consideration of construction and operational effects (13.5), the spatial scope for the designated heritage assets should be increased to 7.5km given the

scale of the development and the potential maximum height of the stack at 100m. This is comparable with the study area proposed for the LVIA. This assessment should include those non-designated assets of equivalent significance to a Scheduled Monument such as the North Conesby moated site (NLHER ref MLS2213).

The Temporal Scope (13.6.1.1) refers to the potentially permanent consequences for designated archaeological remains. This should be corrected to include the known and potential non-designated archaeological remains, the significance of which is as yet unknown but following field evaluation may be assessed to be of national importance equivalent to a scheduled monument (NPPF, Footnote 63).

In addition, the decommissioning phase will need to take account of any mitigation measures put in place to conserve the significance of heritage assets including those of archaeological interest.

As the report states, no intrusive fieldwork has been undertaken during the preparation of this preliminary Scoping report (13.7.1.2). However, as already noted above, further desk based work for the EIA will need to be based upon an updated search of the NLHER data and other relevant historic environment databases for the whole area of the development as is now proposed.

Desk based assessment has been appropriate for this initial scoping exercise, but there is inadequate information available from these sources to enable an accurate assessment of significance sufficient for EIA purposes. Given the potential heritage impacts desk based assessment alone will not produce sufficient robust information on which to base impact assessment or consider appropriate mitigation planned into the construction programme and timetable.

An EIA for archaeology based solely on desk based assessment would be inadequate; as such it would not be possible for the HER and local planning authority to advise the Examining Authority on local impacts or agree a Statement of Common Ground. Nor would it be possible for the Examining Authority to make an informed planning decision in line with the National Policy Statement, the NPPF or the local planning policies.

The Technical Scope and Approach to the EIA (13.7) should therefore set out that the subsequent heritage assessment will need to include the undertaking of archaeological field evaluation to be able to assess the significance of archaeological remains sufficient to inform the design of the development and the decision-making process.

In order to produce appropriate information for the EIA, the scope of the archaeological and cultural heritage assessment will need to comprise an assessment based on preliminary desk based synthetic work **AND** the results of fieldwork including archaeological evaluation as follows:

## 1. Desk Based Synthesis

- Baseline review of existing historic environment data sources to collate and synthesise the available information relating to **all** known and potential heritage assets within the spatial scope advised above. This shall include up to date access of local and national databases, local archives, historic maps and plans, aerial photographs, LIDAR, geo-archaeological and palaeo-environmental resource, geological and geotechnical data, and published and unpublished documents
- Site visit to identify the presence of, or potential for, any above or below ground heritage assets within the development area, and any constraints on archaeological fieldwork

## 2. Field Evaluation

- A programme of hand and/or machine drilled coring to produce a detailed deposit model of the sub-surface topography of the application area, to identify and model the deposit sequence and former land surfaces, and provide an understanding of the development of the landscape; and to obtain appropriate samples for assessment of preservation potential and the potential for palaeo-environmental evidence to inform the archaeological record; this assessment should include all relevant palaeo-environmental indicators and provision for a programme of scientific dating of the deposit sequence; specialist geo-archaeological expertise should inform the preparation of a specification for this work to be agreed with the HER prior to commencement;
- Dependent on ground conditions, field surveys such as fieldwalking, geophysical survey and gridded test pitting;

- Excavation of sample trial trenches to determine the nature, extent, state of preservation and importance of any archaeological remains, such as those associated with the warping channels mapped in this area, the peat deposits and the pre-peat landscape.

### 3. Assessment of Significance

- Assessment of the significance of those heritage assets and their settings likely to be directly or indirectly impacted by the development; the assessment of the significance of heritage assets will take account of the combined results of all the preceding stages of desk and site based assessment, and be based on the heritage values set out in *Conservation Principles, Policies and Guidance for the sustainable management of the historic environment*, Historic England, 2008 <https://www.historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/>.
- The methodology of assessing the contribution of setting to significance should be undertaken as set out in Historic England's Historic Environment Good Practice Advice Note 3 (formerly 'The Setting of Heritage Assets') <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets>
- The use of photographic visualisations from appropriate viewpoints in the surrounding area looking towards, from within and across the heritage assets would be of particular use to demonstrate effects of the proposals on settings, including evidence of no effects. Impacts other than visual, such as noise, dust and odour, should also be considered. A viewpoint from the Scheduled Monument south of Flixborough and production of a photomontage should inform both the LVIA and Cultural Heritage assessment for this project.
- The use of DMRB methodology for the assessment of setting is not considered appropriate for the majority of this development and should only be exercised in relation to that part of the development for the construction of the new access road (13.7.1.11).

### 4. Assessment of Impact

- Assessment of impact of the proposed development on the significance of the heritage assets and their setting based on the findings of the preceding stages, with reference to details of proposed construction ground works, the scale, mass and height of the development and the cumulative impact with nearby developments.

If the assessment demonstrates that the significance of heritage assets will be adversely affected by the proposals, then appropriate mitigation measures should be drawn up to conserve them in accordance with the national and local planning policies. This may include avoiding or minimizing effects to areas of significance, if necessary by modifying the layout and/or design of the proposals ie. In situ preservation. Alternatively, where loss of heritage assets as a result of development is considered justified, provision should be made to record the evidence before it is lost either in advance of, or during, development.

Mitigation measures should be detailed in the Environment Statement, including the provision of Written Schemes of Investigation (specification) for further archaeological recording, as may be necessary. Where a DCO may subsequently be granted, the implementation of appropriate and agreed mitigation measures can be secured by requirement.

I welcome the proposal for further consultation with the HER. This will provide the opportunity to ensure that the scope and content of the heritage assessment will be adequate and in line with national and local planning policies.