

From: [REDACTED]
To: [North Lincolnshire Green Energy Project](#)
Cc: [REDACTED]
Subject: RE: EN010116 – North Lincolnshire Green Energy Park our ref. PL00723482 - HISTORIC ENGLAND ADVICE
Date: 15 December 2022 22:46:08
Attachments: [image001.jpg](#)
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Application by North Lincolnshire Green Energy Park Limited for an Order Granting Development Consent for the North Lincolnshire Green Energy Park Project Planning Act 2008 – Sections 88 and 89 and The Infrastructure Planning (Examination Procedure) Rules 2010 – Rules – 8, 13 and 16 Examination Timetable and procedure, Notification of Hearings and Notification of Accompanied Site Inspection Unique Reference: NLGE-SP004

HISTORIC ENGLAND ADVICE our ref. PL00723482

Dear ExA,

Thank you for contacting Historic England regarding ExA's First Questions for Deadline 2

I have sought to address these below, please note I am your contact point for this scheme and all correspondence should be addressed to myself copied to our casework address Midlands ePlanning [REDACTED]

9 Historic Environment

Ref.	Directed to	Question	Historic England Advice
Q9.0.1	The Applicant (i) only Historic England, NLC (ii) and (iii) only	Mitigation Within [APP-060] Section 7 on mitigation identifies at paragraph 5.5.4.2 that the archaeologist would have a mandate to stop work, and this is also referenced within the Written Scheme of Investigation paragraph 7.1.1.4. (i) Please explain how this is secured (ii) Do you consider the current mechanism for securing a protocol to suspend works is sufficiently robust? (iii) In the event that the current mechanisms are not considered sufficient what change would you seek?	The current mechanism is not it appears sufficiently robust in that no protocol whereby stoppage can be secured is set out. This may ultimately be addressed within written schemes of investigation (to be approved by LPA post-grant of DCO) but at point of DCO will be unsecured and hence uncertain. Particular risk may occur if a substantial stoppage is required to address burials or remains of national importance. An additional requirement setting out a process for notification of the Minister

			and safeguarding pending a specific WSI being prepared - in the case of discoveries of such importance and complexity that they could not be appropriately mitigated within the scope of a programme of rolling supervision and recording under a general WSI would appear appropriate.
Q9.0.4	NLC and Historic England	<p>Written Scheme of Investigation (WSI)</p> <p>(i) Please provide a critique of the WSI contained within appendices E and F of [APP-060].</p> <p>(ii) Are you satisfied that the content and level of detail would allow you to discharge your responsibilities?</p>	We refer you to the advice of the North Lincolnshire Council's Historic Environment Officer who is best placed to answer.
Q9.0.5	NLC and Historic England	<p>Assessment of heritage Assets and any Impacts With the limitations identified in section 5.5 of [APP-060] are you satisfied that the ES has fully assessed the likely adverse effects on cultural heritage</p>	<p>The ES cannot be regarded as having fully assessed the likely adverse impacts on cultural heritage with reference to the limitations set out 5.5. in particular because trial trenching has been pushed to post-DCO. The geophysical survey and deposit modelling undertaken thus far provides a framework for further investigation and targeted mitigation. Whilst the broad character of remains which may be encountered is described this is as yet not tested by trench excavation. As discussed in our answer at Q9.0.1 and Q9.0.6 the archaeological requirement at APP-007 Requirement 11 should be</p>

			reinforced in proportion to the uncertainty as to the importance of remains which may be encountered and the impact of development thereupon.
Q9.0.6	NLC and Historic England	Mitigation (i) Are you satisfied with the mitigation as proposed and content it is appropriately secured through the dDCO? (ii) In the event this is not the case please provide a proposed form of words for a requirement or other form of securing the necessary mitigation as appropriate.	<p>i) No</p> <p>ii) The further exploratory archaeological investigations identified in APP-007 Requirement 11-(1) are defined by the submitted WSI under APP-060 appendixes E-F, and hence are clearly framed (as at Q9.0.4 we refer you to the advice of the LPA Heritage Officer as to their acceptability).</p> <p>At APP-007 Requirement 11- (2) the programme of mitigation fieldwork is required to be 'informed by the exploratory investigations referred to in sub-paragraph (1). The scope of the mitigation fieldwork is set out under App-007 11 – (2) a-d with a requirement for WSI to be approved by the local planning authority, however the acceptability of such WSI is not tied back to a specific outline archaeological strategy. In the absence of such a document we suggest that the Geoarchaeological evaluation and deposit model which we understand is currently in preparation for submission should also include an Outline Archaeological Strategy so that App – 007</p>

			<p>– Requirement 11 (2) can require submitted WSI to be in compliance with that outline strategy. An outline strategy can serve as a yardstick to assist the LPA in the robust determination of requests for approval of WSI under that requirement. The scope of requirement under App-007 11 – (2) a-d could usefully be expanded to make clear that the WSI in alignment with the construction management plan (or similar) can include measures for the minimisation of collateral impacts upon buried remains through the refinement of working practices and methods (such as for instance vehicle routes, compound locations, piling methodologies or drainage /ground water management works).</p>
Q9.0.7	The Applicant	<p>Mitigation (i) Requirement 11 of the dDCO [APP-007] refers to a Written Scheme of Mitigation please clarify if this is correct. Appendix C-H of [APP-060] refer to Written Schemes of Investigation. (ii) If they are separate documents/processes please explain how they tie together and that both are secured within the DCO if appropriate</p>	<p>See also our response to Q9.0.6</p>
Q9.0.10	The Applicant (I and ii), NLC and Historic England (iii)	<p>Significance of Effect [APP-060] at paragraphs 2.2.1.9 and 5.2.2.3 recognise that noise can have an adverse effect on heritage assets. This is not subsequently addressed within this chapter of the ES. (i) Can the Applicant point out where the assessment of noise and vibration on heritage assets can be found,</p>	<p>i) At present the character of sub-surface remains is insufficiently understood to give a clear view as regards the impacts of vibration on buried remains, however through a staged process of investigation this can be</p>

		<p>giving the chapter and particular paragraph numbers. (ii) Within Table 3 of [APP-055] the Applicant confirms that there are no historic buildings near the proposed site works, how does this comment address any concerns regarding noise and or vibration for archaeology or other heritage interests? (iii) Are HE and NLC content with the assessment of heritage assets with regard to potential noise and or vibration effects?</p>	<p>better understood, as understandings of the character and sensitivity of sub-surface features develop, through fieldwork these impacts can be addressed through design / working methods to address risk (see our response to Q.9.0.6)</p>
Q9.0.11	<p>The Applicant (i) only Historic England, NLC (ii)</p>	<p>Degree of Harm (i) Paragraph 8.2.1.6 of [APP-060] indicates that the assessment of effect on Flixborough Saxon Nunnery as moderate adverse, is this regarded as significant? (ii) Do you agree with the Applicant's overall conclusion at 9.3.1.4 that the effects would constitute less than substantial harm? Please explain your response as necessary.</p>	<p>ii) The setting relationship of Flixborough Nunnery to the River contributes to the significance of the monument. In which context ferry crossing between Flixborough and Amcotes and passage up and down the river is likely to have been very important. The introduction of the proposed development into this landscape is through its prominent scale and massing likely to result in a considerable degree of less than substantial harm, the classification of this as moderate adverse appears reasonable.</p>
Q9.0.13	<p>The Applicant (i and iii), NLC and Historic England (ii and iii)</p>	<p>Historic Landscape Character Assessment (HLCA)</p> <p>(i) Within the ES [APP-060] paragraphs 8.4.1.2 and 8.4.1.3 the Applicant states 'If the HLCA is considered to be of moderate value'. Is it correct to assume the value you attribute to each HLCA as moderate?</p>	<p>ii) We defer to the Council with regards to the value of the Axholme Fen and Normanby Scarp. The identification of a significant environmental effect in respect of the Axholme Fen appears reasonable. The national importance of the Isle of Axholme with its strip field farming was established in</p>

		<p>(ii) Do the Council and Historic England agree that the Axholme Fens and Normanby Scarp HLCA has moderate value?? Lincolnshire</p> <p>(iii) What weight should this assessment have within the planning balance?</p>	<p>the 1997 Isle of Axholme Historic Landscape Characterisation Project (former Countryside Commission). As explored in the 2011 Historic Landscape Characterisation (Lincolnshire County Council) the Axholme Fen prior to drainage had an intimate relationship to the higher arable lands of the Isle providing a rich variety of wetland resources.</p> <p>iii) Great Weight on the basis of the setting contribution of the Axholme Fen to the significance of the Isle of Axholme and Flixborough Nunnery SM both of which are of national importance.</p>
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Yours sincerely

Tim Allen

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