

**Subject:**

RE: [EXTERNAL] FW: Humber Low Scoping Response

**From:** Neil McBride [REDACTED]

**Sent:** 31 May 2022 09:15

**To:** Killip, Andrew [REDACTED]

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Morning Andrew,

Further to our conversation last week as agreed I enclose the comments we would have submitted at the scoping stage should they had been available.

So attached are the Historic Advisor comments and those from the Public Rights of Way team are set out below.

“We have identified a small number of public rights of way affected as the corridor skirts the Lincolnshire County Council boundary at Bigby parish – these are, from west to east:

Bigby – Public footpath No. 58

Bigby – Public Footpath No. 57

Bigby - Public Footpath No. 50

Of these, PF 50 is part of the County’s premier long distance walk, The Viking Way.

As part of any scoping it would be expected to see what mitigation is proposed during the construction of the facility and also what proposals for restoration of the legal lines of the public rights of way would be.”

I trust this is helpful to you but let me know if you require further clarification.

Regards

**Neil McBride**

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## Historic Environment Comments on Scoping Opinion for the Humber Low Carbon Pipeline

Only a small section of the overall route falls within the administrative area of Lincolnshire County Council, which is within the parish of Bigby in the district of West Lindsey. These comments relate only to the historic environment within the area for which we are responsible.

We would like to draw the developer's attention to the important non-designated medieval and post-medieval remains at Kettleby manor and its landscape within Bigby parish. This was an important medieval moated manor belonging to the Tyrwhitts (who were MPs, and held many high positions in local and national society until they fell out of favour during the Reformation because of their Catholic faith). The known remains include a deserted medieval village and the moated manor itself, as well as its associated former deer park and post-medieval gardens. Although there is not much left above ground beyond the moat and a later Listed house (which may reuse some earlier fabric) the chosen route has a high potential to have an impact on below ground remains of this historic designed landscape. At Kettleby Thorpe there is also another known deserted medieval village and a probable earlier Roman villa (known from antiquarian finds). Although some of this site has been quarried out there is the potential for any future pipeline route to have an impact on areas that have been left undisturbed by previous activity.

We welcome the early engagement from the developer and their cultural heritage consultants, with a number of constructive meetings already having taken place.

The Council agrees cultural heritage should be 'scoped in' as proposed in the EIA Scoping Report. Appropriate assessments of cultural heritage should therefore be included as part of the Environmental Statement. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 states "***The EIA must identify, describe and assess in an appropriate manner...the direct and indirect significant impacts of the proposed development on...material assets, cultural heritage and the landscape.***" (Regulation 5 (2d)).

The full extent of the proposed development area, should be included in the evaluation process, beginning with desk-based research, and followed by non-intrusive and intrusive evaluation. Archaeological impacts and subsequent mitigation have the potential for significant impacts so sufficient evaluation is essential in informing the selection process and in ensuring the subsequent design and work programme is devised with an understanding of the level of archaeological work which may be required before and during the construction phase.

The Environmental Impact Assessment will require desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact. The results should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation. The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), and the National Planning Policy Framework.

Detailed comments on individual points in the Cultural Heritage section of the EIA Scoping Report are included below.

Paragraph 9.4.1 – The Council agrees with the proposed 500m Study Area for the Scoping Route Corridor as this would be proportionate and should give sufficient information on the surrounding historic environment necessary for this proposed scheme.

Paragraph 9.5.2 – As noted in this paragraph there are significant known non-designated heritage assets within the Scoping Route Corridor. It is important that both this known information and potential for unknown archaeology which is non-designated, but some of which may be potentially of national importance and equivalent significance to designated heritage assets is fully considered in the Environmental Statement.

Paragraph 9.6 We welcome the intention to consult the Lincolnshire Historic Environment Record and ensure that up to date data is utilised in the production desk-based assessment as part of the Environmental Statement. The range of sources proposed to be used to produce the desk-based assessment is acceptable. We particularly welcome the proposal to commission a specialist geo-archaeological desk-based assessment to help characterise the potential deposits across the landscapes which the project crosses. This could be a useful way to both assess the potential for archaeological remains and the potential for particularly good preservation but also to target fieldwork at areas where potential impacts are greatest and/or where existing archaeological information is lacking. This should help advance understanding of the area's archaeology rather than simply rehashing information already in the local HERs. The Historic England Regional Science Advisor should also be consulted on the geoarchaeological assessment and any future fieldwork, particularly with regard to assessing impacts on waterlogged remains and potential for the survival of palaeoenvironmental evidence.

We also support the proposal for targeted walk-over surveys where these have the potential to add value and reveal as yet recorded remains or assess the condition of known heritage assets rather than walking the entire route.

However, we remain concerned that the field evaluation phase should be carried out as soon as reasonably possible so that it can inform the design of the scheme, and certainly in sufficient time to be fully considered as part of any future DCO, as is required by paragraph 194 of the NPPF and Central Lincolnshire Local Plan Policy LP25. Although there is some general agreement amongst the Heritage Working Group members about the overall proposed approach (what cultural heritage issues are included and excluded), there remains a concerning ambiguity about the proposed timescales for the desk-based assessment and geoarchaeological assessment reporting and when the subsequent phases of field evaluation would be carried out so that its results can be meaningfully considered.

In the event that the Environmental Statement is submitted without sufficient evaluation having been carried out necessary to reasonably assess the potential impacts on known and unknown archaeological remains, the Council would have to reflect this in its Local Impact Report.