

MEMO

**North
Lincolnshire
Council**

TO: ANDREW LAW, DEVELOPMENT MANAGEMENT
FROM: ALISON WILLIAMS, HISTORIC ENVIRONMENT RECORD
REF: PA/SCO/2022/5
DATE: 28/04/2022

SUBJECT: Scoping opinion request to determine the information to be provided in an Environmental Statement in relation to the V-Net Zero Pipeline Project, South Killingholme

SUMMARY OF ADVICE

- Within Section A of the pipeline, the proposed development has the potential for direct impacts on known and potential unknown non-designated archaeological heritage assets in North Lincolnshire dating from the prehistoric and Roman periods
- The Scoping Report proposes to undertake a desk-based assessment for EIA of the Historic Environment (Chapter 8) the scope and methodology for which is acceptable
- I welcome the proposal (8.4.7) for consultation with ourselves to determine the scope of further pre-application archaeological surveys (archaeological field evaluation) that will be necessary to inform the EIA in accordance with the relevant national and local planning policies (North Lincolnshire; CS6, HE8 and HE9)
- Pre-application archaeological evaluation is likely to be required in North Lincolnshire to identify currently unknown archaeological remains and to adequately assess the heritage significance of all identified heritage assets of below-ground archaeological interest, and to assess the impacts of the proposals
- Measures to enhance and conserve the heritage assets and their settings based on the results of the archaeological evaluation and assessment should inform the planning and design of the development
- Mitigation strategies to off-set any justifiable harm that entail further archaeological and/or palaeoenvironmental excavation and recording prior to or during construction work should be submitted with the DCO application and the archaeological works detailed in a Written Scheme of Investigation (WSI)
- The CEMP should refer to any archaeological exclusion zones and sensitive areas and make provision for appropriate protection measures; WSIs for archaeological mitigation work should be appended to the CEMP.

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 HER on this scoping report that includes the Historic Environment (Chapter 8).

Heritage Baseline

The archaeological consultant has recently obtained the HER records and spatial data for the EIA study area around the development.

Our records show that the area of the Pipeline Project in North Lincolnshire to the south of the VPI power plant contains known archaeological sites of prehistoric and Romano-British occupation and has high potential to contain further as yet unrecorded archaeological remains of this date range, as well as palaeoenvironmental deposits with the potential to inform the archaeological resource such as the effects of sea level and climate changes on the surrounding environment.

Previous archaeological evaluations and excavations in this area have recorded an Iron Age and Roman settlement site on the site of the VPI power plant (formerly the Conoco CHP plant), Iron Age enclosures and roundhouses along the new A160 junction with Rosper Road, Bronze Age activity, Iron Age and Roman occupation east of the old junction, and a triple-ditched enclosure surrounding a Roman settlement adjoining the scoping boundary within Houlton's Covert and where the extensive Roman occupation extends over the boundary into North East Lincolnshire.

Despite the industrial landscape in this area, there is high potential that further archaeological remains and significant palaeoenvironmental deposits associated with former tidal inlets will survive within the proposed development site, currently of unknown significance that would be disturbed and or destroyed during construction.

In view of this potential, and in accordance with policy 194 of the NPPF, Core Strategy CS6 and saved Local Plan policies HE8 and HE9, detailed heritage assessment including archaeological field evaluation would be required for new development proposals in this area.

Relevant Policy

The National Planning Policy Framework (NPPF, 2021) provides guidance to local authorities for conserving and enhancing heritage assets and their settings, which includes archaeological sites and remains. Paragraph 8 refers to the role of the planning system to contribute to achieving sustainable development under three overarching objectives; economic, social and environmental. The environmental objective includes contributing to protecting and enhancing the historic environment.

Section 16 (paragraphs 189-208) of the NPPF details the government's approach to conserving and enhancing the historic environment. Paragraph 189 describes heritage assets as '**an irreplaceable resource**' to be '**conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations**'.

Paragraph 194 requires an applicant to submit information that identifies any heritage asset that their proposals may affect, and that assesses the significance of the assets including the contribution of their settings. Consultation of the local HER is the minimum requirement in this process. Paragraph 194 states that '**Where a site on which development is proposed includes, or has the potential to include, heritage assets of archaeological interest, local planning authorities should require developers to submit an appropriate desk based assessment and, where necessary, a field evaluation.**'

This information should be sufficient to understand the potential impact of the proposal on the significance of any affected heritage assets. It should also allow the local planning authority to assess the degree of impact on the heritage assets and their settings, and how this impact may be mitigated, by avoiding or minimising any conflict between conserving the asset and any aspect of the proposal (NPPF 195).

Such assessment allows the planning authority to make an informed and reasonable decision in line with the sustainable development principles of the NPPF, as well as local planning Plan policies HE8 Ancient Monuments and HE9 Archaeological Evaluation.

Core Strategy policy CS6 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....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.’**

Policy HE9 Archaeological Evaluation states that **‘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.’

Heritage Assessment – Scoping Advice

Any application submitted for this proposed development will need to be accompanied by a heritage assessment prepared in line with the HER advice in this memo.

A suitably experienced heritage specialist should carry out the following assessments on the applicants behalf and should comprise **ALL** the following stages:

1. Desk Based Research

- Collation and synthesis of existing historic environment data sources relating to **all** heritage assets that the proposed development may affect directly or indirectly. The spatial scope should be a minimum 2km from the site boundary for designated heritage assets and 1km for non-designated heritage assets to provide the archaeological context for the subsequent fieldwork, including appropriate research objectives. Sources should include but not be limited to: local and national databases; local archives; historic maps and plans including illustrating the development of the modern industry; assessment of aerial photographs, drone survey and LIDAR data; other published and unpublished documents.
- Geo-archaeological assessment of existing data for the site to produce a preliminary deposit model of the sub-surface of the application site and identify gaps for further investigation
- Site visit to identify the presence of any above or below ground archaeological remains or historic landscape features within the application area and/or any constraints on the following stages of archaeological fieldwork

2. Pre-Application Archaeological Field Evaluation

- Archaeological monitoring and recording during geo-technical investigations on the site.
- Hand augering or machine drilled purposive coring to fill any identified gaps in the deposit model, to identify and model the deposit sequence and former land surfaces, and provide an understanding of the development of the landscape; and/or to obtain appropriate samples for

- assessment of preservation potential and the potential for palaeo-environmental evidence to inform the archaeological record including all relevant palaeo-environmental indicators and provision for a programme of scientific dating of the deposit sequence as appropriate.
- Geophysical survey of the working width of the pipeline corridor to identify and plot anomalies of potential archaeological origin
 - Excavation of sample trial trenches to determine the nature, extent, state of preservation and importance of any archaeological remains within the proposed development area informed by the results of preceding stages of study and survey
 - The archaeological field evaluation be carried out by a suitably experienced archaeological contractor, such as a Registered Organisation accredited by the Chartered Institute for Archaeology (see <http://www.archaeologists.net/>) or an organisation that can demonstrate that they have equivalent experience, capability and quality management systems in place. The appointed contractor must have access to appropriate geo-archaeological expertise. All fieldwork should be undertaken in accordance with CIFA's published Standards and Guidance for evaluation, and Historic England professional guidelines (<https://www.historicengland.org.uk/images-books/publications>) to written specifications that have been agreed with the HER prior to commencement.

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 based assessment and site field evaluation, 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 ('The Setting of Heritage Assets' 2nd Edition, 2017) <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>.
- The use of photographic visualisations from appropriate viewpoints towards and out from the proposed site would be of particular use to demonstrate indirect 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. Viewpoints should be agreed with the HER and planning case officers.

4. Assessment of Impact

- Assessment of impacts of the proposed development on the significance of the heritage assets and their settings based on the findings of the preceding stages, with reference to details of proposed construction ground works in relation to archaeological assets, and justification of impacts explaining why the works would be necessary or desirable, including any benefits or heritage enhancements which justify any resulting harm. In the case of substantial harm or loss of significance, the relevant tests in the NPPF should be applied.
- Consideration must also be given for future accessibility to conduct archaeological investigations to ensure the archaeological interest is maintained and available for future generations to investigate.

5. Mitigation

- An explanation of any measures taken to avoid, minimise or mitigate any harm to the significance of the heritage asset/s, including within their settings.
- Where harm is unavoidable, measures to offset the harm to significance should be included; in the case of archaeological remains these measures should be set out in a Written Scheme of Investigation (WSI) detailing the scope, methodologies and timelines of an appropriate programme of archaeological work.

Assessing the value of heritage assets and the magnitude of change (see 8.5.3 & 8.5.6, Scoping Report) should take place on completion of **ALL** stages of the field evaluation set out above, and the Environmental Statement should include the results of all historic environment and archaeological fieldwork reports.

The Environmental Statement should consider what the impact of the development on the significance of the heritage assets will be together with a statement of justification of why the works would be

desirable or necessary, including any benefits which justify any resulting harm. In the case of substantial harm or loss of significance, the tests in the NPPF should be applied.

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. 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 harm is unavoidable and 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 application, including the provision of Written Schemes of Investigation (specification) for further archaeological excavation and recording, as may be necessary.

Where a DCO may subsequently be granted, the implementation of the agreed appropriate mitigation measures can be secured by an appropriately worded Requirement without pre-commencement delay to the construction programme.

Recommendation

Any application submitted for this site would need to be accompanied by an adequate Historic Environment assessment as set out above to inform the EIA and accord with paragraph 194 of the NPPF, Core Strategy CS6 and saved Local Plan policies HE8 and HE9.

Where the heritage assessment in the EIA is considered to be incomplete or inadequate, the HER will advise the local planning authority for the Local Impact Report.

I would be grateful therefore if you would pass this advice to the applicant or their consultant.

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