

# MEMO

**North  
Lincolnshire  
Council**

**TO:** DEAN WATSON, DEVELOPMENT MANAGEMENT  
**FROM:** ALISON WILLIAMS, HISTORIC ENVIRONMENT OFFICER  
**REF:** PA/2023/421  
**DATE:** 05/12/2023

**SUBJECT:** Planning permission for the construction & operation of a post-combustion carbon capture plant, including carbon dioxide compressor & metering, cooling equipment, stacks, substations, internal roads, partial ditch realignment, new & modified services, connections, internal roads, accesses, maintenance & laydown areas, VPI Power Station, Rosper Road, South Killingholme

## SUMMARY OF ADVICE

- The applicant has submitted an Archaeological Mitigation Strategy that provides for the preservation in situ and pre-construction excavation and recording of features identified within specified areas of the application site
- The proposals are set out in a Framework Written Scheme of Investigation (WSI) titled '*VPI Immingham, Humber Zero Project; Written Scheme of Investigation for Archaeological Mitigation Works*' rev dated 04/12/2023
- The mitigation strategy accords with the recommendations advised in my memo dated 25/05/2023
- The scheme of investigation is satisfactory, and I have no further objection to the determination of the application
- Should the planning authority consent the application, any permission should be subject to conditions securing the implementation of the mitigation strategy in accordance with the Framework WSI
- Planning conditions are advised below
- This procedure is in accordance with paragraphs 203 and 205 of the NPPF, and local planning policies CS6 and HE9.

**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 the opportunity to comment further on this planning application. This memo should be read together with my previous response to the application dated 25 May 2023.

The applicant submitted a Framework Written Scheme of Investigation for archaeological mitigation on 16 November. Please note the submitted document titled '*VPI Immingham, Humber Zero Project; Written Scheme of Investigation for Archaeological Mitigation Works*' had been superseded by a further version sent to the HER on 4<sup>th</sup> December (copy attached). The applicant will be submitting this final amended version with their application shortly.

The framework document provides for a programme of preservation in situ and pre-construction archaeological excavation work to be carried out in advance of groundworks associated with the proposed development, as follows:

- Archaeological preservation in situ of the Roman settlement remains within the temporary car park adjacent Rosper Road throughout the duration of the proposed development (WSI, Fig 2)
- Archaeological excavations within the main construction areas (WSI, Fig 2) to preserve by record the remains in this area that would be destroyed by the development
- Programme of community engagement with the project
- Post excavation assessment, analysis, publication and archiving of results with the North Lincolnshire Museum Service and the Archaeological Data Service.

The WSI for archaeological mitigation provides that a detailed project design will be prepared by the archaeological contractor appointed to carry out the programme of work. The project design will include the results of scientific dating and palaeoenvironmental assessment of samples retained from the previous archaeological evaluation works to inform the planning for the main excavations. On completion of the excavations and post-excavation assessment, an updated project design (UPD) will be prepared based on the results and recommendations for further analysis to achieve the research objectives of the project. The project design and all updates would be submitted to the HER and the planning authority for their written approval prior to implementation of the specified works.

I am satisfied that the strategy for archaeological mitigation set out in the WSI is acceptable to achieve preservation in situ and the proportionate preservation by record. The specified areas of the archaeological investigations in the revised WSI and the methodologies for archaeological recording are appropriate to the significance of the known archaeological remains.

As such I have no further objection to the determination of the application. The archaeological considerations should inform the planning decision and be given due weight in the planning balance in accordance with paragraphs 203 and 205 of the NPPF, and with local planning policies for the historic environment including CS6 and HE9.

## **RECOMMENDATION**

There are no archaeological reasons to object to the planning application subject to planning conditions securing the implementation of the agreed programme of archaeological works in accordance with the revised version of the submitted Framework WSI for Mitigation.

Should the planning authority consider the loss of the archaeological remains is justified, or otherwise grant permission for this application I would be grateful if the following conditions are attached to any consent, to secure the implementation of the agreed archaeological mitigation strategy:

### **Condition 1**

No development shall take place until the applicant or their successors in title has commissioned and secured the implementation of the approved Framework Written Scheme of Investigation (WSI) for a

programme of archaeological mitigation (Document No: ACW1502/1/1/ rev 3 dated 4 December 2023), and until they have submitted the appointed archaeological contractor's detailed project design and updates specified in the WSI to the local planning authority for their written approval prior to implementation. The project design will include details of the following:

- i. Results of scientific dating and palaeoenvironmental assessment of retained evaluation samples to inform the project planning.
- ii. Measures to ensure the preservation in situ and by record of archaeological and palaeoenvironmental remains within the areas defined in Figure 2 of the WSI.
- iii. Methodologies for the recording and recovery of archaeological and palaeoenvironmental remains including artefacts and ecofacts.
- iv. Post-fieldwork processes for preparation of assessment reports, updated project designs and analyses.
- v. Report contents and arrangements for dissemination, and publication proposals.
- vi. Archive preparation and deposition with recognised repositories including the digital archive with the ADS.
- vii. A timetable of works in relation to the proposed development, including sufficient notification and allowance of time to ensure that the site work is undertaken and completed in accordance with the mitigation WSI.
- viii. Arrangements to notify the North Lincolnshire Historic Environment Officer of the commencement of archaeological works at least 10 working days before commencement and a schedule of visits to monitor the works.
- ix. A list of all staff involved in the implementation of the WSI including sub-contractors and specialists, their responsibilities, and qualifications.

**Reason**

To preserve in situ and by record the important archaeological remains identified within the site in accordance with paragraph 205 of the NPPF, policy CS6 of the Core Strategy, and saved policy HE9 of the North Lincolnshire Local Plan.

**Condition 2**

The applicant shall notify the HER and planning authority in writing of the intention to commence each stage of the archaeological site works referred to in the mitigation WSI at least 10 days before commencement. Thereafter, the archaeological programmes shall be carried out in accordance with the details and timings in the approved project designs. The development shall not become operational until the post-excavation assessment has been completed and any further analysis commissioned including provision for the publication and dissemination of results and archive deposition.

**Reason:** To preserve by record any archaeological remains within the development site in accordance with paragraph 205 of the NPPF, policy CS6 of the Core Strategy, and saved policy HE9 of the North Lincolnshire Local Plan.

**Condition 3**

A copy of any analysis, reporting, publication, or archiving required as part of the approved mitigation strategy shall be deposited at the North Lincolnshire Historic Environment Record and the archive at the North Lincolnshire Museum within 24 months of the commencement of the archaeological programme of work or such other period as may be agreed in writing by the local planning authority.

**Reason:** To preserve by record any archaeological remains within the development site in accordance with paragraph 205 of the NPPF, policy CS6 of the Core Strategy, and saved policy HE9 of the North Lincolnshire Local Plan.

**Alison Williams**

