



**PREESALL UNDERGROUND GAS STORAGE FACILITY,
LANCASHIRE**

**Infrastructure Planning Commission (IPC) Application
Reference Number: EN030001**

**STATEMENT OF COMMON GROUND BETWEEN HYDER
CONSULTING (UK) LIMITED (ON BEHALF OF HALITE ENERGY
GROUP LIMITED) AND LANCASHIRE COUNTY COUNCIL ON
THE TOPIC OF ARCHAEOLOGY AND BUILT HERITAGE**

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1 INTRODUCTION

1.1.1 This is a Statement of Common Ground (SoCG) between Hyder Consulting (UK) Limited (Hyder) (on behalf of Halite Energy Group Limited) and Lancashire County Council (LCC) on the topic of Archaeology and Built Heritage.

1.1.2 Archaeology and Built Heritage has been the subject of discussions between Hyder (on behalf of Halite Energy Group Limited) and LCC at the pre-Development Consent Order (DCO) Application stage. A telephone conversation was held with Peter Iles of LCC on 28 February 2012 at 12 noon to discuss the Archaeology and Built Heritage SoCG. The aim of this discussion was, where possible, to reach a common ground in relation to the following DCO Application Documents:

- Chapter 7: Archaeology and Built Heritage of Volume 1A of the Environmental Statement (ES) (DCO Application Document Reference 5.1)
- Appendices 7.1, 7.2, 7.3, 7.4 and 7.5 of Volume 1B of the ES (DCO Application Document Reference 5.2)
- Figures 7.1 and 7.2 of Volume 2B of the ES (DCO Application Document Reference 5.4)

2 ACCEPTED DATA

2.1 Assessment Methodology

- 2.1.1 The methodology sets out the approach to the Archaeology and Built Heritage assessment, and is presented within Section 7.3 of Volume 1A of the ES.
- 2.1.2 LCC notes that the methodology for assessing the value of sites and remains does not take account of the initiatives set out in the Regional Research Agenda (*Brennand M (ed.) 2007 Research and Archaeology in North West England, An Archaeological Research Framework for North West England: Volume 2 Research Agenda and Strategy*). However, LCC agrees that the relevance of such regional guidance is indicated in Table 7-2 of Section 7.3 of the ES. Hyder agrees that any relevant sections of the Regional Research Agenda will be referenced in the appropriate Written Scheme of Investigation (WSI) that is produced for the archaeological mitigation. The methodology proposed in the WSI will take into account the aims of the Regional Research Agenda. LCC agrees that this approach was acceptable.
- 2.1.3 The assessment methodology is considered appropriate and agreed.

2.2 Baseline Information

- 2.2.1 Sections 7.4 and 7.5 of Volume 1A of the ES present the existing and future baseline information, respectively, that has been considered in relation to the Archaeology and Built Heritage assessment.
- 2.2.2 LCC notes that a number of identified sites referred to in Section 7.4 do not have an assigned number, e.g. Higher Lickow Farm within paragraph 7.4.31. Hyder confirms that that this resulted from Higher Lickow Farm being identified as an asset as a result of the cartographic analysis, rather than it appearing on the Historic Environment Records (HER) or the National Monuments Record (NMR) searches which were carried out. All assets which appeared on the HER and NMR searches were assigned a number and any site which was identified as a result of other research did not receive a number. LCC accepts this explanation.
- 2.2.3 As indicated above within paragraph 2.1.2 of this SoCG, LCC notes the omission of reference to the Regional Research Agenda, which if used would have altered the sensitivity value of certain identified sites in their opinion. However, LCC accepts that even if the sensitivity value of certain identified sites was altered, this would not alter the identified residual effects as a result of the Project (the ultimate conclusion being that there would be no significant effects on the archaeological or built heritage resource) as the mitigation and enhancement measures proposed are agreed (refer to Section 2.4 of this SoCG). Therefore, the baseline information is considered appropriate and agreed.
- 2.2.4 Although the baseline information is considered appropriate and agreed, LCC and Hyder do have a difference in professional opinion in terms of the sensitivity value of certain sites. These differences are outlined in the following points.

However, as stated above in Section 2.2.3, LCC accepts that even if the sensitivity value of these sites was altered, this would not alter the identified residual effects as a result of the Project (the ultimate conclusion being that there would be no significant effects on the archaeological or built heritage resource) as the mitigation and enhancement measures proposed are agreed (refer to Section 2.4 of this SoCG):

- Within Table 7-9 in Section 7.4, containing the evaluation of receptors, the first three entries (the channel within the brine outfall pipe area, the potential for Mesolithic activity in the vicinity of the brine outfall pipe and the potential for prehistoric remains in and around Pilling Moss) have been given values which do not appear to be supported by the current state of knowledge and should be 'unknown', and that this approach would be supported by the inclusion of the latter two sites within Table 7-10 in Section 7.6 of the ES. In particular, LCC considers the value of the Prehistoric remains in the Pilling area should be 'medium' in line with the initiatives set out in chapter 2 of the Regional Research Agenda.
- Within Table 7-9 in Section 7.4, the value given to the 13 marine items found along the brine outfall pipe is identified as 'negligible'. LCC considers that this should be 'low' as the items have not yet been positively identified.
- Within Table 7-9 in Section 7.4, Site 54 Rossall Hall Grange is assigned 'low' value. Given the site's importance as one of the two Medieval centres on the Fylde peninsula and its ownership by a religious order, LCC considers it would merit a 'medium' rather than a 'low' value. It is acknowledged by LCC that the actual Grange site has yet to be identified, but it is only potentially on the foreshore and thus should not be downgraded for poor survival until it has been located.
- Hackensall Tide Mill is the only recorded tide mill in Lancashire, and is thought to be of Medieval origin. Its site is marked on 19th century mapping and whilst it probably was in use into the Post-medieval period, it has not been occupied by other types of development. Deposits in this area are likely to be waterlogged and thus aid preservation of organic materials. With reference to Table 7-9 in Section 7.4, it is the opinion of LCC that this site should be of 'medium' value rather than 'low'.
- Within Table 7-9 in Section 7.4, the early Hackensall Hall site and associated earthworks are given a 'low' value. LCC considers this does not reflect its potential and a 'medium' value would seem more appropriate. It is acknowledged by LCC, however, that this is somewhat academic as the site falls outside of the application boundary.
- LCC considers the detail given for sites 106 and 107 (remains of clay extraction) are sparse, and it is not obvious if these are more of the Pilling Graves (paragraph 7.4.27 of the ES) or another form of clay digging. If the former, then they are of some importance as their origin is still disputed and no modern professional excavation has been undertaken.
- Two sites identified by geophysical survey (south of New Hall Farm and east of Bone Hill Farm) are noted as potential archaeological sites, but have yet to be subject to further investigation. As above, LCC considers

that with reference to Table 7-9 in Section 7.4, this would seem to merit a value of 'unknown' and potentially 'medium' rather than 'low'.

2.3 Potential Effects

2.3.1 Section 7.7 of Volume 1A of the ES presents the Potential Effects on Archaeology and Built Heritage as a result of the Project without consideration of the proposed mitigation and enhancement measures.

2.3.2 As previously indicated within paragraph 2.1.2 of this SoCG, LCC notes the omission of reference to the Regional Research Agenda, which if used would have increased the sensitivity value and ultimately altered the associated significance of potential effects on certain identified sites. However, LCC accepts that even if the significance of potential effects on certain identified sites was altered, this would not alter the identified residual effects as a result of the Project (the ultimate conclusion being that there would be no significant effects on the archaeological or built heritage resource) as the mitigation and enhancement measures proposed are agreed (refer to Section 2.4 of this SoCG). Therefore, the identified potential effects are agreed.

2.3.3 Although the potential effects are agreed, LCC and Hyder do have a difference in professional opinion in terms of the potential effects on certain sites. These differences are outlined in the following points. However, as stated above in Section 2.3.2, LCC accepts that even if the significance of potential effects on these sites was altered, this would not alter the identified residual effects as a result of the Project (the ultimate conclusion being that there would be no significant effects on the archaeological or built heritage resource) as the mitigation and enhancement measures proposed are agreed (refer to Section 2.4 of this SoCG).

- LCC considers scoring within paragraph 7.7.2 should be 'unknown' value, 'major' change, potentially 'slight/moderate' effect and therefore 'significant'. The ES states that there is a 'minor' change to a receptor of 'negligible' value with a 'slight' effect and therefore 'not significant'.
- LCC considers scoring within paragraph 7.7.3 should be 'unknown' value, 'major' change, potentially 'slight/moderate' effect and therefore 'significant'. The ES states that there is a 'minor' change to a receptor of 'low' value with a 'slight' effect and therefore 'not significant'.
- LCC considers scoring within paragraph 7.7.4 should be 'low' value, 'major' change, potentially 'slight/moderate' effect and therefore 'significant'. The ES states that there is a 'minor' change to a receptor of 'negligible' value with a 'slight' effect and therefore 'not significant'.
- LCC considers scoring within paragraph 7.7.6 should be 'medium' value, 'moderate to major' change, 'moderate to large' effect and therefore 'significant'. The ES states that there is a 'minor' change to a receptor of 'low' value with a 'slight' effect and therefore 'not significant'.
- LCC considers scoring within paragraph 7.7.8 should be 'medium' value, 'major' change, 'moderate to large' effect and therefore 'significant'. The ES states that there is a 'major' change to a receptor of 'low' value with a 'slight' effect and therefore 'not significant'.

- LCC considers scoring within paragraph 7.7.17 should be 'low' value, 'major' change, potentially 'slight/moderate' effect and therefore 'significant' (noted that recommendations are made in paragraph 7.8.26). The ES states that there is a 'moderate' change to a receptor of 'low' value with a 'slight' effect and therefore 'not significant'.
- LCC considers scoring within paragraph 7.7.20 should be 'unknown' value, 'major' change, potentially 'slight/moderate' effect and therefore 'significant'. The ES states that there is a 'moderate' change to a receptor of 'low' value with a 'slight' effect and therefore 'not significant'.
- LCC considers scoring within paragraph 7.7.21 should be 'unknown' value, 'major' change, potentially 'slight/moderate' effect and therefore 'significant'. The ES states that there is a 'moderate' change to a receptor of 'low' value with a 'slight' effect and therefore 'not significant'.
- LCC considers scoring within paragraph 7.7.22 should be 'unknown' value, 'major' change, 'moderate/large' effect and therefore 'significant'. The ES states that there is a 'moderate' change to a receptor of 'low' value with a 'slight' effect and therefore 'not significant'.

2.4 Mitigation and Enhancement Measures

2.4.1 Mitigation and enhancement measures are identified within Section 7.8 of Volume 1A of the ES.

2.4.2 As previously indicated within paragraph 2.1.2 of this SoCG, LCC notes the omission of reference to the Regional Research Agenda, which if used would have increased the sensitivity value and ultimately altered the associated significance of potential effects on certain identified sites. LCC states that this could also alter proposed further archaeological works recommended for certain sites.

2.4.3 Hyder suggests that any relevant sections of the Regional Research Agenda will be referenced in the appropriate WSI that is produced for the archaeological mitigation. The methodology proposed in the WSI will take into account the aims of the Regional Research Agenda. LCC agrees that this approach is acceptable.

2.4.4 LCC accepts that as these points, if considered within the ES Chapter, would not alter the identified residual effects as a result of the Project, (the ultimate conclusion being that there would be no significant effects on the archaeological or built heritage resource), the mitigation and enhancement measures are agreed.

2.5 Residual Effects

2.5.1 Section 7.9 of Volume 1A of the ES presents the Residual Effects, i.e. with incorporation of the proposed mitigation and enhancement measures.

2.5.2 The residual effects are agreed.

3 DATA NOT ACCEPTED

3.1.1 Although LCC and Hyder do have a difference in professional opinion in terms of the sensitivity value of certain sites and the potential effects on certain sites, it is agreed that this would not alter the identified residual effects as a result of the Project (the ultimate conclusion being that there would be no significant effects on the archaeological or built heritage resource) as the mitigation and enhancement measures proposed are agreed. Therefore, there are no elements of this SoCG (including the documents identified within Section 1.1.2) that are not agreed.

STATEMENT OF COMMON GROUND

This Statement of Common Ground on the topic of Archaeology and Built Heritage has been prepared by Hyder Consulting (UK) Limited, on behalf of Halite Energy Group Limited, and agreed by Lancashire County Council.

Signed _____

Jenny Wylie

on behalf of Hyder Consulting (UK) Limited

Date: 1-6-2012

Signed _____

Michael Green

Cabinet Member for Economic
Development, Environment and
Planning

Date: 1st June 2012

