

Historic England Responses to First Examiner's Written Questions –Hornsea Offshore Wind Farm Project Two

LH2	Historic England (HE)	The desk based and field evaluations in relation to heritage assets with a potential archaeological interest referred to in Table 6.1 of Chapter 6 of the ES Historic Environment ([APP-048a] were carried out in 2011 (see, for example, para. 6.5.9). Will HE comment on the adequacy of the survey material used in the Hornsea Project 2 ES in relation to the historic environment?
<p>Historic England Response: Historic England considers that the relevant local planning authorities, guided by their specialist archaeological advisers, are better placed to comment on the adequacy of the survey material used in the Hornsea Project 2 ES.</p>		

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LH3 (a)	HE and LAs	Do HE and the LAs agree with: (a) The definitions of ‘importance (value or sensitivity)’ set out in the tables of assessment 6.14, 6.15, 6.16, 6.17, 6.18 and 6.19 in Chapter 6 of the ES-Historic Environment [APP-048a]?
<p>Historic England Response:</p> <p>In general Historic England does not agree that importance and/or value is always immediately comparable with the level of sensitivity. We consider that sensitivity is influenced by many factors, of which the level of national importance or architectural or historic significance is one, but which also include the precise nature and significance of the asset and its ability to accommodate change of the particular nature of any individual proposed development without loss of that significance. Therefore each individual asset’s capacity to accommodate change in its setting is different and will depend on the nature of that change.</p> <p>In all the tables the scale set out for the values of cultural heritage assets in HA 208/07 provides the framework but the assignment of definitions and categories of designated assets into that scale has been conducted by the applicant’s heritage consultant.</p> <p>Table 6.14 – 6.16: Historic England does not agree that it is appropriate to automatically consider nationally designated heritage assets as only being of regional/medium importance particularly when all scheduled monuments have been assessed to be of national importance, or that Grade II listed buildings/Registered Parks and Gardens should automatically be considered at a lower level than other nationally designated listed buildings/registered landscapes where that level is more equivalent to non-designated heritage assets. The language used does not in all cases in our view correlate with the terms used to describe the grade of designation of the various types of heritage assets.</p> <p>Table 6.17-6.18: Historic England has no particular issues to note in relation to the assessment of levels of impact on archaeological assets/historic buildings in these tables. We agree that a high magnitude of change can occur due to change within the setting of a heritage asset.</p> <p>Table 6.19: Historic England has no particular issues to note in relation to the assessment of levels of impact on historic landscapes in this table. We agree that a high magnitude of change can occur due to change within the setting of a heritage asset. However, we do not understand why a slightly different approach has been taken with these assets to include noise, visual effects etc. which we would consider should also be taken into account with the assets covered by Tables 6.17 and 6.18.</p>		

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LH3 (b)	HE and LAs	Do HE and the LAs agree with: (b) The values set out in the matrix in Table 6.20 to be used for assessments of significance combining receptor sensitivity and magnitude of effect?
<p>Historic England Response: Table 6.20: Historic England considers that such matrices provide little useful contribution to the assessment of heritage impacts and tend to confuse concepts of the significance, sensitivity and magnitude of impact whilst atomising complex relationships between individual features and apparent impacts. The matrix methodology can result in inappropriate downgrading of impacts of high magnitude on assets of comparatively lower significance. Whilst we appreciate that this methodology is commonly employed we tend to advocate a more narrative approach. However such an approach, more in line with that Historic England usually recommends, is also employed within the following sections of Chapter 6 (see further comments in relation to questions LH3c below).</p>		

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LH3 (c)	HE and LAs	Do HE and the LAs agree with: (c) The use of Highways Agency Guidance Note 208/07 (August 2007) to underpin the definitions of importance in relation to heritage assets in Chapter 6 of the ES-Historic Environment [APP-048a] and if not provide advice on any acceptable alternative approach?
<p>Historic England Response: Historic England recommends that an approach to the definitions of value and in relation to the significance of designated heritage assets follows that we set out in our published guidance 'Conservation Principles, Policies and Guidance' (2008), is reflective of the assessment criteria for the designation process, can be easily understood within the language of the NPPF regarding the significance of heritage assets and the impact of proposals on that significance, and takes account of our most recent published advice on the Historic Environment Good Practice Advice in Planning Notes on Managing Significance in Decision Taking and The Setting of Heritage Assets (GPA3, 2015). Conservation Principles, the NPPF, and the Good Practice in Planning Advice Notes were all published after HA 208/07 therefore we consider that approaches have moved on subsequent to the publication of that guidance note.</p>		

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LH3 (d)	HE and LAs	Do HE and the LAs agree with: (d) The assessment of magnitude of impact and adequacy of the designed in mitigation measures in relation to undesignated heritage assets during the construction phase set out in paras. 6.6.48 to 6.6.126 of Chapter 6 of the ES-Historic Environment [APP-48a]?
<p>Historic England Response: Historic England considers that the relevant local planning authorities, guided by their specialist archaeological and conservation advisers, are better placed to comment on this question.</p>		

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LH3 (e)	HE and LAs	Do HE and the LAs agree with: (e) The assessment of magnitude of impact and adequacy of the designed in and other mitigation measures in relation to Scheduled Monuments, Listed Buildings, conservation areas and Registered Parks and Gardens assets during all phases set out in paras. 6.6.127 to 6.6.272 of Chapter 6 of the ES-Historic Environment [APP-48a]?
<p>Historic England Response:</p> <p>Historic England does not always agree with the assessment of the magnitude of impact in the ES. This is largely due to, in our view, the limited appreciation in the ES of the nature of wider relationships between associated designated and non-designated assets resulting in limited assessment of the potential impact on this wider setting.</p> <p>However, we recognise that the settings of designated heritage assets at the northern end of the pipeline have already suffered significant degradation, with resulting impacts on the significance of the affected assets. Therefore whilst we may consider the magnitude of the impact to be at a higher level than the ES concludes, given the impact of previous development in the same area, we consider that the additional harm is likely to be relatively limited. Whilst the determination of which option will be progressed for the connection of Project Two to the National Grid has not yet been made, we consider that the proposed mitigation strategies are likely to be appropriate although we refer the Planning Inspectorate to the local planning authorities for comments on the detail of the proposed strategies for dealing with non-designated archaeological remains which may contribute positively to the significance which designated heritage assets derive from their settings.</p> <p>In respect of impacts arising from loss of non-designated archaeological remains along the pipeline route, we refer the Planning Inspectorate to the comments of the local planning authorities, guided by their archaeological advisors, in relation to the assessment of the magnitude of such impacts and the adequacy of proposed mitigation measures.</p>		

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LH3 (f)	HE and LAs	Do HE and the LAs agree with: (f) The summary of potential environmental effects set out in Table 6.25 of Chapter 6 of the ES-Historic Environment [APP-48a](particularly in relation to sensitivity of receptor, magnitude of impact, significance of effect including designed in measures and additional mitigation measures and residual significance of effect?
<p>Historic England Response: Historic England agrees that archaeological excavation and the rebuilding of earthwork and coastline features are appropriate mitigation measures in relation to the destruction and loss of archaeological remains with developments of this nature. However in our view, whilst mitigation through restoration of the contours of these features along the route of the pipeline will reduce the long term <i>visual</i> impacts on the setting of other heritage assets and the remainder of similar heritage assets and resources preserved in the areas affected, this cannot completely nullify the loss of <i>evidential</i> value to the setting of the same assets since the earthworks/assets themselves which make that contribution will have been lost even if they have been appropriately recorded. Table 6.25 does not make this distinction therefore we do not agree that all the impacts are temporary, nor that the proposed mitigation can reduce all these impacts to ‘none’.</p>		

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LH4	HE and LAs	Are HE and the LAs satisfied that the potential impacts on all heritage assets impacted by the proposed Hornsea Project 2 proposal in all its phases have been properly assessed and that the proposed mitigation measures are adequate? If not, please outline the nature of the concern and the steps you wish to see taken to deal with it.
<p>Historic England Response:</p> <p>Historic England's comments below are principally in relation to the assessment of potential impacts on designated heritage assets only. We refer the Planning Inspectorate to the comments of the local authorities, guided by the advice of their specialist archaeological advisers, in relation to non-designated heritage assets impacted by the Project 2 proposal.</p> <p>Historic England has raised concerns regarding the extent of the study area and level of assessment conducted for Project 2 in relation to Grade II listed buildings in comparison with Grade I and II* since all listed buildings, regardless of grade of listing, are nationally designated heritage assets. The extent of the study area for highly graded listed buildings is wider than that for Grade II listed buildings. Historic England has raised this concern in principle in relation to our remit; however we would recommend that the Planning Inspectorate refers to the relevant local authorities, guided by their conservation advisers, in relation to whether they consider that the potential impacts on Grade II listed buildings have been properly assessed and whether any proposed mitigation measures are adequate.</p> <p>Historic England does not agree with the conclusions drawn by the applicant in relation to the results of the assessment, but have no concerns that the actual assessment was not conducted properly nor that the proposed mitigation measures relating to direct impacts on designated heritage assets are unlikely to be adequate. We recognise also that non-designated archaeological remains along the onshore route may contribute positively to the significance which designated heritage assets derive from their settings, and in respect of these impacts we refer the Planning Inspectorate to the advice of the local authorities, guided by their archaeological advisers, in relation to whether the impacts of Project 2 on non-designated archaeological remains have been properly assessed and whether the proposed mitigation measures are adequate.</p>		