



Historic England

Professor John Glasson
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2 The Square
Bristol BS1 6PN

Our ref: OWF/UKCS/Hornsea2

Your ref: EN010053

Telephone: 07798 653897

15th July 2015

Dear Professor Glasson,

**Planning Act 2008 (as amended) – Section 89 and the Infrastructure Planning
(Examination Procedure) Rules 2010 – Rule 8 (as amended)
Application by Smart Wind Ltd for an Order Granting Development Consent for
Hornsea Offshore Wind Farm (Zone 4) Project Two**

UNIQUE REFERENCE NUMBER: 10031163

WRITTEN REPRESENTATION

Thank you for the letter, dated 22nd June 2015, requesting submission of Written Representations for the application submitted by Smart Wind Ltd for the Hornsea Offshore Wind Farm Project Two. Please note that we will also submit separate correspondence to address the First Written Questions, as relevant to our interests and responsibilities. Furthermore, we confirm that we have also entered into a Statement of Common Ground with the Applicant (Smart Wind Ltd).

SUMMARY

We consider the following to be the key aspects of our Written Representation:

- The role of the Historic Buildings and Monuments Commission for England;
- We support the proposal for provision to be made within the Draft Development



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Consent Order (including Deemed Marine Licences) for the preparation of archaeological Written Schemes of Investigation as necessary to inform the detailed design and delivery of this project should consent be obtained; and

- Matters to do with the onshore elements concerned principally with the setting impacts of the converter/substation at the end of the cable route at North Killingholme, and any significant issues arising from the presence of non-designated archaeological remains.

1. The role of the Historic Buildings and Monuments Commission for England

1.1 The Historic Buildings and Monuments Commission for England is the Government's advisor on all aspects of the historic environment in England – including historic buildings and areas, archaeology and the historic landscape – and has a duty to promote public understanding and enjoyment. Historic Buildings and Monuments Commission for England (HBMCE) is an Executive Non-departmental Public Body sponsored by the Department for Culture, Media and Sport and we report to Parliament through the Secretary of State for Culture, Media and Sport. Our remit in conservation matters intersects with the policy responsibilities of a number of other government departments – particularly Communities and Local Government, with its responsibilities for land-use planning matters. The National Heritage Act (2002) enabled HBMCE to assume responsibility for maritime archaeology in the English area of the UK Territorial Sea. However, we are aware that part of the export cable and the proposed offshore arrays are located within the UK marine area adjacent to England and in reference to the UK *Marine Policy Statement* and the attention given to cultural heritage we offer advice without prejudice to our responsibilities under the aforementioned Act.

1.2 On 1st April 2015 Historic England was vested (retaining the formal title of the Historic Buildings and Monuments Commission for England) and is now the government service championing England's heritage and giving expert, constructive advice. The English Heritage Trust (also established on 1st April 2015) is now a charity caring for the National Heritage Collection of more than 400 historic properties and their collections. All further requests for advice, as relevant to this proposed project, are to be directed to Historic England.

2. Comments on the Hornsea Offshore Wind Farm Project Two Environmental Statement

2.1 We understand that the proposed Hornsea Project Two (labelled Subzone 2), promoted by Smart Wind Ltd and located within the Hornsea Zone, will comprise two offshore wind farms with a total capacity of up to 1,800 MW and will include all associated offshore and onshore infrastructure. The project information describes how the two wind farms will contain a maximum of 360 offshore wind turbines, with turbine capacities ranging from 5MW to 15MW under consideration. The western boundary of Subzone 2 lies 89 km from the coast of the East Riding of Yorkshire, and the eastern boundary is 50 km from the median line between UK and Dutch waters. We note that the offshore cable route corridor (and study area) is approximately 150km with the proposed landfall situated at Horseshoe Point



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(Lincolnshire), extending offshore in a north-easterly direction to the southern boundary of Subzone 2. From the proposed landfall at Horseshoe Point, onshore cables will connect the offshore wind farms to the onshore HVAC substation/HVDC converter substation for connection with the existing National Grid substation at North Killingholme in north Lincolnshire.

3. Volume 2, Chapter 9 Marine Archaeology and Ordnance (Document Reference 7.2.9)

3.1 We note in paragraph 9.1.2 that “where matters have been discussed and agreed during consultation on Project One, and are applicable to the Project Two EIA, they have been incorporated into this Environmental Statement.” Whilst we acknowledge the practicalities of this approach, we wish to remind the applicant that no two areas are identical and that they undertake this approach at their own risk.

3.2 As a general comment, it was noted throughout the Marine Archaeology and Ordnance chapter and the Draft Written Scheme of Investigation (WSI) annex that there was an inconsistent reference to the number of Archaeological Exclusions Zones (AEZs). Table 9.17 listed 65 AEZs, but in other sections the number varied between 62 and 65.

3.3 The analysis presented in this chapter takes into account the data and information from the North Sea Palaeolandscapes Project (2005-06), and the Humber Regional Environmental Characterisation Study (2011), alongside United Kingdom Hydrographic Office and the National Record of the Historic Environment (NRHE). This represents a good coverage of the available desk-based sources of information to support corroboration with the survey data collected for this project. We also welcome the designed in mitigation methods outlined in Table 9.16 to “offset the impacts of development on sediments of geoarchaeological/palaeoenvironmental importance ... and enhance knowledge of the offshore marine archaeological resource”, as further detailed in paragraph 9.2.24. However, in paragraph 9.6.15 it states that “All A1 anomalies less than 10m long will be buffered by 50m from the recorded edges of the wreck”, but there is no indication as to whether anomalies over 10m long will have a different sized buffer applied.

3.4 We acknowledge the statement in paragraph 9.6.27, that the impact assessment is judged to have shown that the current level of data available for wrecks and anomalies is insufficient to fully understand these sites, and that further geophysical, geotechnical and ROV/diver survey programmes should be designed inclusive of archaeological objectives to compensate. We welcome this approach and emphasise the need for the involvement of an accredited archaeologist to support effective delivery of any agreed archaeological WSI to ensure data capture is suitable for archaeological assessments.

4. Volume 2, Chapter 10 Seascape and Visual Resources (Document Reference 7.2.10)



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- 4.1 We note the use of two Seascape and Visual Impact Assessment areas for Project Two; one covering the turbine array, and the second covering the offshore HVAC reactive compensation substation. Furthermore, the assessment concludes that the majority of seascape and visual impacts of the development would be less than moderate, which are not significant in EIA terms, and those judged to be moderate are considered acceptable due to the fact that the effects are transitory. The reference made in Table 10.3 (Summary of NPS EN-3 policy relevant to Seascape and Visual Resources and consideration of the Project Two assessment) in determining the magnitude of change is very important with regard to Historic Seascape Character.
- 4.2 Further to the detail provided about the Historic Seascape Resources Impact Assessment Methodology (paragraphs 10.6.46 – 10.6.49), which acknowledges that there is no published methodology for use in EIA; we note that paragraph 10.6.70 makes the argument that “...likely effects on Historic Seascape Character during the construction phase would be time-limited and fully reversible following decommissioning.” However, we note a frequent statement that “...most of the HSC...are deemed to be of low vulnerability, high recoverability and of less than regional value”. We must therefore make the point that although this chapter highlights the following: “The existing Historic Seascape Character may change during the operational phase through the introduction of new or uncharacteristic elements/features” we consider it relevant that this chapter should consider any such change is not a temporary effect given the intended operational lifespan of this proposed project. We acknowledge that the Statement of Common Ground prepared with the Applicant does address matters relevant to Historic Seascape Characterisation and we have no other comment to offer.
5. Volume 3, Chapter 6 Historic Environment (Document Reference: 7.3.6)
- 5.1 Historic England offers the following comments on the content of the Environmental Statement (ES) covering the onshore elements of the scheme inclusive of the cable route, the cable landfall point at Horseshoe Point, onshore HVDC converter/HVAC substation and associated structures, buildings, construction compounds and access tracks.
- 5.2 Historic England’s comments with respect to these onshore elements are concerned principally with the setting impacts of the converter/substation at the end of the cable route at North Killingholme, and any significant issues arising from the presence of non-designated archaeological remains along the pipeline route.
- 5.3 The following comments were also made by English Heritage (as known prior to 1st April 2015) in relation to the ES produced for Project One and at the Preliminary Environmental Information consultation stage for Project Two. These points were also discussed at length at the meeting between Smart Wind Ltd and English Heritage on 4th November 2014 (see Table 6.4 of Chapter 7.3.6). It is extremely disappointing therefore to see that our advice has not been taken on board and that the same issues have arisen once again with the assessment provided in the current document.



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- 5.4 Assessment of Impacts on Designated Heritage Assets – We note that the ES Chapter 7.3.6 on the Historic Environment (Section 6.2.2) includes an additional level of assessment in relation to Grade I and II* at a further distance from the HVDC converter/HVAC substation site in comparison with Grade II listed buildings. We would recommend therefore that the Planning Inspectorate is guided by the advice of the conservation advisors in the relevant local authorities as to whether the level of assessment provided is appropriate given that all listed buildings, regardless of grade of listing, are nationally designated heritage assets.
- 5.5 We also noted the comment made in this chapter regarding several designated heritage assets that the National Heritage List for England “gives virtually no indication of, or consideration to, the setting of” the asset in question (e.g. 6.6.131). This should not be expected; listing only assesses the asset against the criteria for listing which do not include setting. It is not the function of the list entry to describe the setting of the designated asset. Views on what comprises a heritage asset’s setting may change as the asset and its surroundings evolve, or as the asset becomes better understood. It is for the applicant to set out a clear description of what constitutes the setting of the heritage assets potentially affected by the proposal and the contribution that setting makes to their significance.
- 5.6 In our view, the definition of setting with respect to the individual assessments of impact on designated assets is often drawn too narrowly and focused upon exclusively visual relationships. It does not appreciate the potential for broadly contemporaneous heritage assets to make a positive contribution to setting and hence significance even if they cannot be identified to be directly historically related (e.g. 6.6.133 Baysgarth Farm moated site). This understanding of setting including the influence of spatial associations and the historic relationships between places is set out clearly in published advice *The Setting of Heritage Assets: Historic Environment Good Practice Advice* in Planning Note 3 (which supersedes the previous English Heritage Setting guidance published in 2011).
- 5.7 As a result there is once again limited appreciation in this chapter of the nature of wider relationships between associated assets and consequently limited assessment of the potential impact on this wider setting. This is apparent for example in regard to the historic landscape of North Lincolnshire in which are located the four scheduled moated sites on the ridge lying between Skitter/East Halton beck and the coast, their associated listed buildings (not restricted to those within the scheduled areas), and non-designated archaeological remains at the northern end of the pipeline where it connects to the HVDC converter/ HVAC substation.
- 5.8 Historic England would not necessarily agree with all the assessments in the ES which conclude that there is no impact on some of the designated heritage assets assessed. Whilst the degradation of the historic setting around North Killingholme resulting from the location of the oil refinery and other existing industrial development means it is likely that the additional negative impacts will be relatively limited, careful consideration should nonetheless be given to selecting



the appropriate means of connection to the National Grid substation. The ES outlines that the options available comprise either transmission via buried High Voltage cables using either Direct Current or Alternating current, or a combination of the two. The photomontages and wireframes produced in Figures 6-11 to 6-15 of chapter 7.3.6 indicating the visual impact on the settings and hence significance of the designated heritage assets within the study area illustrate the worst case scenarios involving construction of the HVDC Converter Station.

- 5.9 From the perspective of visual impacts alone it is clear that the design of the proposed HVAC transmission system involves significantly smaller visual impacts at North Killingholme and therefore on the cumulative degradation of the setting of the designated heritage assets in this area. However, since this technology does involve additional transitional pits and larger cable trenches which consequently increase direct impacts on non-designated archaeological remains, we would recommend that the view of relevant local authorities' historic environment services in relation to the relative potential impacts of the alternative transmission options on such remains along the cable route is also taken into account.
- 5.10 Non-designated Archaeological Remains – Excavation of the pipe trench will entail the destruction and loss of medieval saltern mounds which may delineate the contemporary coastline and sections of medieval cultivation systems (ridge and furrow). Whilst mitigation through restoration of the contours of these features along the route of the pipeline is positive and will reduce the long term visual impacts on the setting of other heritage assets and the remainder of similar heritage assets and resources preserved in the areas affected, this cannot nullify the loss of evidential value to the setting of the same assets.
- 5.11 Historic England recommends that you are guided by the advice of the relevant local authorities' historic environment services in respect of the provision in the draft Development Consent Order (3.1) for a programme of archaeological work to be carried out in advance of the onshore development in accordance with an approved written scheme of investigation. A draft scheme (7.5.9) has been submitted and Historic England would advise that you are specifically guided by the relevant local authorities' historic environment services as to whether the specifications included therein are sufficient and appropriate for both the significance of the archaeological remains likely to be encountered, and the nature of the construction work involved. We note in particular reference to watching briefs for onshore ground works; in our experience these may not be considered sufficient and an appropriately scoped and targeted programme of investigation, for example supervision and recording, may be required. Given noted issues with Project One we would recommend that the requirements of the local authorities' historic environment officers for the treatment of all onshore non-designated remains affected by the scheme are complied with in full in relation to Project Two.
6. [Volume 5, Annex Number 5.9.1 - Marine Archaeology Technical Report \(Document Reference: 7.5.9.1\)](#)



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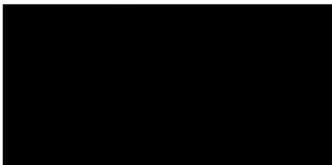


- 6.1 In the section “Results of Analysis of Geophysical Survey Data” it is evident that there is sensitivity variation in the magnetic amplitude of the anomalies relative to the size of the observed structure. We note from the sub-section “Magnetometer” in 5.4 (“Baseline Review”) that an altitude of between 8 and 15 metres was maintained above the seabed within Subzone 1, but that limited detail was provided about the altitude and the distance the magnetometer was towed in Subzone 2. Furthermore, we note the distance in which the magnetometer was towed also varied, sometimes as much as 120 metres across the survey areas. Whilst we acknowledge that the extent of the survey area is large and it can vary in depth, it is apparent that there is quite a degree of variation between some of the amplitudes recorded which in turn makes reliable determination and anomaly discrimination more difficult.
- 6.2 In consideration of these matters, we consider it important to note that an inconsistent approach to surveying and even subsequent interpretation can provide insufficient confidence necessary to inform decisions about appropriate mitigation strategies. Therefore, whilst it would appear logical to assume that if the position of visible debris and structure correlated to a low magnetic amplitude it would most likely constitute the remains of a timber constructed vessel, it may be more plausible that the magnetometer may not have captured the reading at the optimal depth, or within an appropriate line spacing to provide a more reliable interpretational reading. As an additional matter, the cross-referencing of some anomalies requires amendment; this is best illustrated within the content to the sub-headed Anomaly 71984, Anomaly 71986 and Anomaly 71995 (page 41- 42) in comparison with the content of the gazetteer.
- 6.3 In reference to the comprehensiveness of the data coverage and its associated interpretative detail, we note the limitations of some of the information such as the large amount of A2 anomalies (Gazetteer page 247-318). The anomalies identified are predominantly of small dimensions, represent a large spatial range of potential archaeological remains that will, should they be found within the vicinity of the planned turbine placement, require additional archaeological investigation and interpretation to establish a greater degree of confidence in their provenance.
- 6.5 Paragraph 6.6.147 makes reference to dated material from the upper fills of the main western Holocene palaeo-channel in the northernmost part of the offshore cable route corridor which runs into Subzone 2. We are therefore inclined to agree with the statement which outlines the significance of these dates that “lie at or very close to the surface of the seafloor within and around these Early Holocene palaeochannels”. Therefore, based on the information provided, it would appear there is no reason not to expect that there is evidence of prehistoric human inhabitation within the study area prior to the flandrian transgression. It is also important to note that prehistoric remains specifically dating to the Late Upper Palaeolithic and Early to Middle Mesolithic are sparse, not just offshore but also terrestrially. Therefore, any such remains would provide not only evidential value, toward a more continuous archaeological narrative, but also when investigated using a staged archaeological approach the potential to produce new information of interest to public and academic audiences.



7. Volume 5 (Offshore Annexes), Annex Number 5.9.2 Archaeological Monitoring and Mitigation: Draft Written Scheme of Investigation (Document Reference 7.5.9.2)
- 7.1 An important statement is made that the draft WSI forms an integral part of the Offshore Wind Farm's Framework of Environmental Management Controls. We therefore appreciate the action that any agreed mitigation will be incorporated within all construction, operation and decommissioning plans and that all staff and their agents and contractors are bound to implement the terms of the WSI. In reference to paragraph 5.5.17, any reference to the Institute for Archaeologists is to be amended to the Chartered Institute for Archaeologists.
8. Draft Development Consent Order (Document Reference 3.1)
- 8.1 Schedules H (Deemed Marine Licence under the Marine and Coastal Access Act 2009 - Deemed Marine Licence A1) I (Deemed Marine Licence A2), J (Deemed Marine Licence B1), and K (Deemed Marine Licence B2) – Part 1, Condition 1(4)(i) amend all references from English Heritage to Historic England.
- 8.2 Schedules H (Deemed Marine Licence A1), I (Deemed Marine Licence A2), J (Deemed Marine Licence B1), and K (Deemed Marine Licence B2) – Part 2, Condition 10(6)(b) amend all references from English Heritage to Historic England.

Yours sincerely,



Christopher Pater
Head of Marine Planning

Cc Helen Woodhouse (Inspector of Ancient Monuments – Historic England, East Midlands)



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