

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

LH15 (a)	Historic England (HE) Local Authorities	Section 5 of the SoCG between the Applicant and Lincolnshire County Council (LCC) in relation to onshore heritage refers to a disagreement in relation to completion of the agreed programme of archaeological trial trenching evaluation in respect of non-designated archaeological remains. a) Do HE and the local authorities agree with the applicant that the trenching undertaken to date combined with the various non-intrusive surveys has characterised the archaeology of the proposed cable route?
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Historic England Response:
 We are aware that the issue of this disagreement was raised at the last Issue Specific Hearing and we understood that the applicant was to provide additional information by way of an update on progress on the works requested by the local authorities. We note the submission of Appendix S to the Applicant's Response to Deadline IV: Heritage Survey Extents together with the applicant's response.
 Historic England considers that the relevant local planning authorities, guided by their specialist archaeological advisers who have access to the local authority/county Historic Environment Records, are better placed to comment on whether the extent of the archaeological evaluation to date has characterised the archaeological resource within the line of the proposed cable route.

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LH15 (b)	Historic England (HE) Local Authorities	(b) Is this sufficient to properly assess the heritage interest of the proposed development.
<p>Historic England Response: As above, Historic England considers that the relevant local planning authorities, guided by their specialist archaeological advisers, are better placed to comment on whether the extent of the archaeological evaluation to date has been sufficient to properly assess the heritage interest of the proposed development. However, we would comment that in our view it is extremely important with schemes of this nature to ensure that the investigation and evaluation programme can provide a robust understanding of the archaeological resource preserved throughout the development zone, on which basis decisions can be made regarding opportunities to avoid, minimise or mitigate impacts on that resource. Without such a baseline understanding across the development zone of the significance of the archaeological remains it will not in our view be possible to determine whether there is a need to consider options other than mitigation. We refer you to the advice of the local authority archaeologists as to whether the work conducted to date has been sufficient in this regard.</p>		

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LH15 (c)	Historic England (HE) Local Authorities	(c) Is this sufficient information to be able to propose appropriate mitigation?
Historic England Response: We refer you to our comments above. Historic England considers that the relevant local planning authorities, guided by their specialist archaeological advisers, are better placed to comment on whether the extent of the archaeological evaluation to date is sufficient to be able to propose appropriate mitigation.		

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LH15 (d)	Historic England (HE) Local Authorities	d) Does the applicant's commitment, (in Table 6.22 of Volume 3, Chapter 6: Historic Environment (APP-048a)) to include the recording as appropriate of those areas of archaeology not previously subject to trial trenching as required by Requirement 6 of the draft DCO prior to Construction (paras 5.1.3 and 5.1.4 of the SoCG) (REP2-033 and REP2-035) represent a satisfactory response to the issue?
<p>Historic England Response:</p> <p>In general, it is our view that in order to assess whether a proposed mitigation strategy of 'preservation by record' in some areas as is effectively suggested in Table 6.22 as referenced above would be appropriate, this needs to be based on an understanding of the significance of the archaeological resource that will be encountered and the impacts of the proposed development. Historic England considers that the relevant local planning authorities, guided by their specialist archaeological advisers, are better placed to comment on whether there is a need for trial trenching to extend into those areas not previously sampled by such methods in order to assess whether such a programme of mitigation would be appropriate in those circumstances based on their more detailed knowledge of the local archaeological resource.</p>		

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LH15 (e)	Historic England (HE) Local Authorities	e) If not please state why not and how the DCO could secure this work if it is deemed necessary?
<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 respond to this question.</p> <p>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 Development Consent Order 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. 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.</p>		

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LH17 (a)	Historic England (HE), North Lincolnshire Council, North East Lincolnshire Council	<p>The applicant has provided at Deadline 2a visualisations of the worst case scenario visual impact of the two main buildings at the electrical transmission stations in Works 8A and 8B if the mode of transmission is HVDC (REP2A-011).</p> <p>(a) Do HE and the local authorities have any further comment to make on the visual impact of these structures specifically and with reference to the setting of listed buildings and scheduled monuments in the vicinity and the adequacy of the proposed mitigation?</p>
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Historic England Response:

In line with our comments at the last Issue Specific Hearing, we welcome the production of these additional visualisations by the applicant. In our view they provide some illustration of the extent of the visual impact of the HVDC option as viewed from various locations at Thornton Abbey and around East Halton including from the scheduled monument at Manor Farm. Whilst we acknowledge the validity of the selection of the lower level Gatehouse viewpoint location opposite the information panel, it is clear that the visual impacts at lower level will be apparent from other locations when moving in and around the site.

We have stated previously that we are aware of the degradation of the historic setting of the nationally designated heritage assets in this area resulting from the location of the oil refinery and other existing industrial development, and the implications this has for the assessment of the impact of the proposed development. However, we would not suggest that as a result there is no need to explore all opportunities to both minimise (e.g. through selection of transmission mode) and/or mitigate those impacts. It is clear to us on the basis of the submitted information that the HVDC option will have an additional harmful impact on the significance of the heritage assets affected, and will contribute to the further degradation of their settings. Historic England would recommend that the potential to reduce any impacts on the significance of designated heritage assets resulting from the scheme should be explored, whether



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through minimisation of impacts or appropriate mitigation. It has been proposed that additional planting would assist in reducing the visual impact of the proposed HVDC converter on designated heritage assets. Historic England would welcome consideration of how planting might assist in helping the experience of the site to remain focused on the historic aspects and form. However, we also recognise that planting proposals are unlikely to completely screen the proposed development in all views from in and around individual sites. Therefore we would recommend that particular consideration is given to the impact that such planting might have on distracting the viewer from the visual impact within key views, related specifically to the significance of the designated heritage assets in question and the experience of visiting those sites. Additional photomontages illustrating the impact of proposed planting schemes over a period of years as they mature might be of assistance in assessing whether this form of proposed mitigation was adequate.

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LH17 (b)	Historic England (HE), North Lincolnshire Council, North East Lincolnshire Council	b) With particular reference to Thornton Abbey and Manor Farm Moated Site East Halton – if further mitigation is required what form should it take?
<p>Historic England Response:</p> <p>In the event that it is decided to proceed with the worst case scenario in terms of visual impacts on designated heritage assets, in which case opportunities to minimise the visual harm will in the main have been lost, we would suggest that all opportunities to mitigate those visual impacts should be explored by the applicant. We are minded to consider that under such circumstances a planting scheme at Thornton Abbey might be likely to be more effective in relation to key views than at Manor Farm due to the nature of the site and its visual relationship with its setting. However, whilst it might not screen the development such planting might be able to at least reduce the visual impacts by helping to distract the viewer from this aspect of the heritage assets' setting. Historic England would welcome a strong commitment from the applicant to fully explore such opportunities.</p>		