

The Planning Act 2008

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Farms

Planning Inspectorate Reference: EA1N – EN010077, EA2 – EN010078

Deadline 2 - 17 November 2020

Comments of Suffolk County Council as Archaeological Authority

1. Comments on WRs

Not applicable.

2. Comments on responses to RRs

Regarding Applicant's Comments on Relevant Representations Volume 3 Technical Stakeholders 11th June 2020 2.4 Suffolk County Council 012- the Parish boundary is also identified as the Hundred boundary. This is further highlighted in SCC's Local Impact Report and Annexes.

3. Comments on LIRs

Not applicable.

4. Comments on any SoCG

These comments are in respect of the SoCG with SPR.

ID	Topic	Statement	EA2 Ltd position	EA1N Ltd position	ESC position n/a	SCC position	Notes
Table 1	Archaeology and Cultural Heritage Onshore Archaeology	All matters relating to the Assessment Methodology have been Agreed. Matters relating to the Existing Environment, Assessment Conclusions and Mitigation remains under discussion.					To clarify, the Assessment Methodology in terms of the overall approach to the Environmental Statement for this topic is agreed, but the methodology for characterising the existing baseline (Existing Environment) remains under discussion.
LA-06.02	Onshore Archaeology and Cultural Heritage	Sufficient non-intrusive survey data has been collected to inform the assessment.					However, SCC do agree that sufficient Desk-based Assessment and geophysical survey work.
LA-06.03	Onshore Archaeology and Cultural Heritage	Notwithstanding the survey locations for which access was not granted, the trial trenching campaign undertaken by the Applicants (document reference ExA.AS-13.D1.V1), in combination with the geophysical survey results, provide sufficient high-level information to inform the assessment of the					SCC do not agree that the trial trenching provides 'sufficient high-level information to inform the assessment of significance and character of remains within the cable corridor' – only at the pinch points that were trenched and the substation.

		significance and character of archaeological remains within the onshore cable corridor.					
LA-06.04		The trial trenching campaign undertaken at the landfall and at Grove Road by the Applicants (document reference ExA.AS-13.D1.V1), in combination with the geophysical survey results, provide sufficient high-level information on the date and character of sites to inform the assessment of the significance and character of archaeological remains at these locations.					Trial trenching has not been undertaken at landfall and Grove Road, which is why this statement is not agreed by SCC. The cable corridor generally was also not subject to systematic trial trenching so should be included in this statement.
LA-06.05		Sufficient intrusive survey data has been collected to inform the assessment					The Notes accompanying this statement say that 'Requirement 19 and Requirement 20 of the draft DCO (APP023) will together ensure that the appropriate programme of archaeological investigation and mitigation is undertaken at the appropriate time prior to commencement of construction. It should be emphasised that this is subject to agreement of wording (see LA06.16 and LA06.17 of the draft SOCG, relating to wording of requirement 19 and requirement 20 of the draft DCO).

							<p>Additionally, the SCC add to caution of the risk of over-reliance on geophysical survey that there is still potential for more extensive and complicated remains than indicated that there is some risk to sites as yet unknown or where significance is not fully established, and that there are risks to elements of project planning (particularly costs and timescales, as well as linked considerations such as dust and spoil) as the full scope of mitigation (including likely extensive groundworks) will not be defined until after consent has been granted.</p>
LA-06.06		<p>The ES includes sufficient information to adequately characterise the baseline environment in terms of archaeology and cultural heritage.</p>					<p>The Notes accompanying this statement say that 'Requirement 19 and Requirement 20 of the draft DCO (APP023) will together ensure that the appropriate programme of archaeological investigation and mitigation is undertaken at the appropriate time prior to commencement of construction. It should be emphasised that this is subject to agreement of wording (see LA06.16 and LA06.17 of the draft SOCG, relating to wording of requirement 19 and</p>

							<p>requirement 20 of the draft DCO).</p> <p>See also comment made above for LA06.05, in relation to ground truthing geophysical survey.</p>
LA-06.16		<p>The wording of Requirement 19 provided within the <i>draft DCO</i> (APP-023) (and supporting certified documents) with reference to development of a pre-commencement archaeology execution plan to detail the scope of the archaeological works is appropriate and adequate.</p>					<p>SCC's concern is to ensure that Requirement 19 (and the PCAEP) makes accommodation for the implementation of pre-commencement archaeological works in advance of, or alongside other pre-commencement works (i.e. access or ecological mitigation), and that pre-commencement works are undertaken in accordance with the principles set out in the Outline WSI.</p>
LA-06.17		<p>The wording of Requirement 20 provided within the <i>draft DCO</i> (APP-023) (and supporting certified documents) with reference to development of a written scheme of archaeological investigation detailing the methodology, mitigation and recording of archaeological investigation works is appropriate and adequate.</p>					<p>The Applicants and SCC are currently in discussion regarding the wording of Requirement 20 of the draft DCO (APP-023)' –and, additionally, the Outline Written Scheme of Investigation.</p>

5. Comments on responses to the ExAs Written Questions (ExQ1)

ExQs 1	Question to:	Question:	1	2	Applicants Response	SCC Comments
1.8.16	Applicants and SCC	outline additional necessary measures to be secured within the final WSI (onshore) and Pre-Commencement Archaeology Execution Plan.			<p>The Applicants have broadly agreed the scope of further additional intrusive archaeological surveys to commence in 2021. During these surveys trial-trenches will not be sited across the historic trackway at the onshore substation location, or the locations of Cable Ceiling End Compounds and proposed mitigation planting areas, unless otherwise agreed with the County Archaeologist (see section 4 of the Archaeology and Cultural Heritage Clarification Note submitted at Deadline 1 (ExA.AS-10.D1.V1)). It is the view of the Applicants that the commitment to 5% sampling (see section 4 of the Archaeology and Cultural Heritage Clarification Note (ExA.AS-10.D1.V1)) of the onshore development area plus ongoing consultation with the Councils' advisers, addresses the Councils' concerns that to date insufficient intrusive survey data has been collected. Further information on trial trenching is provided in the Pre Construction Trial Trenching Report submitted by the Applicants at Deadline 1</p>	<p>We would agree that for PROW reasons siting trial trenches across the trackway will need to be deferred until a later phase of works than proposed trial trenching in 2021.</p> <p>It is not clear why trenching is not proposed across the Cable Ceiling End compounds and proposed mitigation planting areas- these should be subject to evaluation if there are to be below ground impacts.</p> <p>The proposed trial trenching works do provide reassurance that a systematic programme of evaluation will be undertaken to inform post-consent mitigation (although see SCC LIR for the principles of decision making and the timing of evaluation). We note that the applicants will consider community involvement in future archaeological investigations [of the Hundred Boundary]. Whilst we appreciate constraints, health and safety, lands rights and the construction programme, there is scope to be proactive to work within these parameters – the opportunity is raised in relation to the total loss of</p>

				<p>(ExA.AS-13.D1.V1). Finally, the Councils have indicated that they consider there to be an opportunity to involve the community in future archaeological investigations. The Applicants will further consider this request within the confines of other constraints, including health and safety, land rights and construction programme.</p>	<p>this feature within the development area.</p> <p>The applicant's response does not cover the wider requirements overall in relation to the final WSI and PCAEP. An amended PCAEP has been submitted for Deadline 1, which SCCAS support. However, amendments are also required to the Outline WSI and to DCO wording, as per Appendix 12 to the LIR (and as noted in SCC responses to the Examining Authority's questions).</p>
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6. Comments on any additional information/submissions received by Deadline 1

Archaeology and Cultural Heritage Clarification Note (ExA.AS-10.D1.V1). In relation to below ground archaeology and direct physical impacts on the Hundred/Parish boundary,, the need to defer further field evaluation and mitigation to a post-consent stage of works is accepted.

Archaeological Geophysical Survey Report (9 parts) is acknowledged. –

Pre-Construction Trial Trenching (ExA.AS-13.D1.V1) – this should actually be called Pre-Determination Trial Trenching – pre-construction trial trenching will be a different project and a much larger one.

Earthworks Report – (EXA.AS-15.D1.V1) submission is acknowledged.

Outline Landfall Construction Method Statement (EXA.AS-2.D1.VA) – 5.1, (paragraphs 20, 21 and 23) – In relation to HDD works at landfall, the archaeological works will need to be undertaken prior to site set up especially soil stripping, so requirement 19 relating to archaeology will also need to be complied with. The CMS should be amended to reflect this. Also, 51, impacts of bentonite breakout on archaeological remains were investigated for the EA1/3 projects and it was concluded that whilst impacts are likely to be negligible, there is potential for clean up or break out to impact on very shallow archaeological remains, or very deep ones - some cross linking to archaeological documents would be useful here.

Outline Pre-Commencement Archaeology Execution Plan (Updated DCO submission document 8.20) – the amended version as submitted for deadline 2 addresses SCC comments as presented in Appendix 12 of the LIR so are in a position to agree this document.

7. Comments on Post hearing submissions

Not applicable.

8. Responses to any further information requested by the ExA for this deadline

Not applicable.