



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 3 - 15 December 2020

Comments of Suffolk County Council as Archaeological Authority

- 1. Post hearing submissions including written submissions of oral case (if required).**
 - 1.1 See separate submission.
- 2. Response to ExA's further written Questions (ExQ2) (if required).**
 - 2.1 Not applicable.
- 3. The Applicants revised draft DCO (dDCO).**
 - 3.1 Not applicable.
- 4. Any revised /updated SoCG (if any).**
 - 4.1 Not applicable.
- 5. Comments on any additional information/submissions received by Deadline 2.**

Applicants' Comments on Responses to Examining Authority's Written Questions ExA.WQRs.D2.V1

1.8.16 SCC acknowledges the documents submitted by the Applicants for Deadline 1.

- 5.1 Amendments are still required to the Outline WSI and to the DCO wording (as per Appendix 12 of the LIR and as noted in SCC responses to the Examining Authority's Questions). SCC are pleased that the Applicants have committed to continuing to engage with the Councils regarding the DCO wording via the SoCG process. SCC are also pleased to note that in 1.8.13, the Applicants have stated that an updated Outline WSI (APP-582) will be submitted to the Examinations at Deadline 3
- 5.2 As previously raised by SCC in the response provided to Q1.8.16 submitted at Deadline 2, the Applicants have yet to address why in their Deadline 1 response to the Examining Authority's Question, they stated that are not proposing to trench the Cable Sealing End Compounds and proposed mitigation planting areas- SCC would continue to advise that these areas should be subject to evaluation if there are to be below ground impacts.

Applicants' Comments on Local Impact Report ExA.LIR.D2.V1

Response to Applicants' comments of LIR section 13. Archaeology

Compliance with policy

- 5.3 SCC would draw the Applicants' attention to Policy SCLP11.7 of the Suffolk Coastal Local Plan which states that:

'An archaeological assessment proportionate to the potential and significance of remains must be included with any planning application affecting areas of known or suspected archaeological importance to ensure that provision is made for the preservation of important archaeological remains.'

- 5.4 This is further clarified by 11.41 of the Local Plan which states that:

'SCLP11.7 requires a full archaeological assessment of sites within potential areas of archaeological importance to describe the significance of any heritage assets affected and to ensure that provision is made for the preservation of important remains, particularly those that may be demonstrably of national significance. Archaeological Assessment prior to determination may comprise a combination of desk-based assessment, geophysical survey and/or field evaluation.'

- 5.5 The proposed 5% trial trenching of the onshore development area by the Applicants does, however, provide assurance that a systematic programme of evaluation will be undertaken to inform post-consent mitigation.

Further work required

- 5.6 SCC are pleased that the Applicants have committed to considering the changes requested by SCC (as per Appendix 12 of the LIR and as noted in SCC responses to the Examining Authority's Questions) and submitting an updated draft DCO and Outline WSI.

SCC acknowledges documents submitted by the Applicant for Deadline 1.

- 5.7 As above, SCC are pleased that the Applicants have committed to further pre-construction trial trenching.
- 5.8 SCC would like to highlight again that we recommend all areas in the DCO order limits where there are to be below ground impacts should be subjected to an archaeological trial trench evaluation of 5%. SCC are in discussion with the Applicants to agree the scope of this work at landfall, along the cable corridor and at the substation site. The Applicants have previously cited issues with land access as a reason for not being able to complete the agreed earthwork assessment or pre-consent trial trenched evaluation in full or undertake a metal detecting survey on the Buxlow church/chapel site, but as the Applicants have committed to undertaking further trial trenching in Spring 2021, proactive engagement with landowners should be undertaken to try to secure access to complete the outstanding assessment work in all remaining areas, with key pinch points such as the Grove Wood area being a particular priority. SCC recommend that any areas where trenched evaluation is not possible until post-consent due to land access restrictions, will still require trenching at the earliest opportunity in

order to allow archaeological mitigation requirements to be defined and undertaken prior to any pre-commencement or construction works, in line with project timetables.

5.9 SCC would advise that in addition to the non-intrusive surveys already completed and the proposed additional trial trenched survey, the following archaeological assessments remain outstanding:

- Completion of the earthwork survey to cover areas identified as inaccessible or only part surveyed on Illustration 1 of document ExA.AS-15.D1.V1SPR.
- Completion of a metal detecting survey for County Historic Environment Record KND 009, the potential site of Buxlow Church/Chapel

5.10 In addition, SCC would advise that the following work set out as required in the LIR is outstanding (although SCC note that the Applicants have acknowledged this point in the Archaeology and Cultural Heritage Classification Note (Exa.AS-10.D1.V1) and in their responses to the ExAs Written Questions submitted at Deadline 1).

- Development of a programme of outreach work through S111, to include community engagement with mitigation for impacts on the Hundred Boundary

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

5.12 Clearer indications of timescales for archaeological work in high level project timescales have yet to be provided by the Applicants.

6. Notification from any Affected Person of wish to speak at Compulsory Acquisition Hearing 2 (CAH2).

6.1 Not applicable.

7. Notification of wish to speak at any Issue Specific Hearings w/c 18 and 25 January 2021.

7.1 See separate submission.

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

8.1 Not applicable.