



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 4 – 13 January 2021

Comments of Suffolk County Council as Archaeological Authority

1. Comments on the Applicant's revised draft Development Consent Order

- 1.1 Comments previously provided by SCC on the revised draft Development Consent Order with regards to archaeological requirements (SCC LIR appendix 2) have not been taken on board within the revised draft DCO. SCC therefore remain unable to fully support the wording of draft DCO requirements 19 and 20. SCC would advise that previous comments need to be addressed in order to ensure that the requirement wording is clear and robust.
- 1.2 Requirement 19 does not at present fully make accommodation for archaeology to be investigated in advance of, or alongside other pre-commencement works (such as access or ecological mitigation). However, the need for this is set out and acknowledged in the OPCAEP. The requirement as proposed also does not explicitly require that pre-commencement works are undertaken in accordance with the principles set out in the outline WSI.
- 1.3 Requirement 20 does not at present clearly reflect the likely stages of archaeological work.

2. Comments on any revised/updated Statement of Common Ground (if any)

- 2.1 Not applicable.

3. Comments on any additional information/submissions received by Deadline 3

Deadline 3 Submission - 8.5 Outline Written Scheme of Investigation Archaeology and Cultural Heritage (Onshore) - *EA1N-DWF-ENV-REP-IBR-000387*

- 3.1 SCC are pleased that the Applicants have made significant efforts to revise this document in line with the comments made in the SCC LIR (appendix 2). Whilst these changes make this document clearer and more robust, SCC would advise that a small number of further amendments and minor additions are still required in order to enable SCC to agree a final version of this document.
- 3.2 Section 6.4 and Para 99 and Para 116: This should set out the need for 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 (Deadline 1 Submission - Onshore Archaeology Earthworks Report - Rev-01).
- 3.3 Paragraph 102: This revised wording of this paragraph still undermines the whole WSI and is not in the spirit of the Outline CoCP, which is about safe delivery with consideration for control measures. Health and Safety is of paramount importance, but the paragraph needs revising to say that the aims of the archaeological project, as dictated by sector specific guidance, will be

met through projects that are informed by health and safety at all times. This may involve developing approaches and working practices such as stepping and shoring and may involve solutions to be developed to safely investigate archaeological remains to fulfil the WSI, proportionate to the significance of those remains. Where conflict between Health and Safety and progressing the archaeological project is identified, every effort should be made by the client, in discussion with the archaeological contractors and SCCAS, to identify a safe way of completing the archaeological investigations to appropriate standards.

- 3.4 Paragraph 110: This should make clear that additional trenching is required across the whole scheme, not targeted on positive geophysical results with some sampling of apparent blank areas. A full and systematic survey will be required across the scheme to ground-truth the data and cover any shortfalls in the geophysical technique.
- 3.5 Paragraph 111: This section also needs to include the following details-
- Trenches machining should be undertaken under the supervision of a suitably qualified archaeologist.
 - Sampling strategies during trenched evaluation need to be expanded upon and should reflect those set out in the SCC standard requirements trial trenched evaluation document 2020 All archaeological features encountered during trenched evaluation should be sampled, unless otherwise agreed with SCC. <https://www.suffolk.gov.uk/assets/culture-heritage-and-leisure/suffolk-archaeological-service/SCCAS-Trenched-Archaeological-Evaluation-JAN-2021.pdf>.
 - A statement regarding dealing appropriately with any human remains encountered is needed.
 - Provision for metal detecting (by a suitably experienced metal detectorist) to be undertaken as part of the trial trenched evaluation should be made.
 - Trenches will not be backfilled until these have been viewed and signed off by SCCAS.
- 3.6 Paragraph 122: This should state that if for any reason an SPE needs to be undertaken in conjunction with mobilisation for construction, construction will hold off until archaeological work is completed.
- 3.7 Paragraph 125: This should set out that a toothless bucket must be used.
- 3.8 Paragraph 127: The sampling strategy should be sufficient to understand the site and significant and complex features such as structural remains, burials and kilns will require full excavation as per the SCC standard requirements for archaeological excavation document (2020).

<https://www.suffolk.gov.uk/assets/culture-heritage-and-leisure/suffolk-archaeological-service/SCCAS-Requirements-for-Archaeological-Excavation-JAN-2021.pdf>

- 3.9 Paragraph 128: Metal detecting should be undertaken across mitigation areas prior to, during and after stripping, with spoil also scanned.
- 3.10 The SPE section should also set out the following-
- Parameters for excavations on sandy soil – sites should not be left open too long on the one hand and large areas should not be stripped, whilst at the same time work should not be too piecemeal.
 - Excavation plant movement should be restricted over stripped areas.
 - A statement regarding dealing appropriately with any human remains encountered is needed.
 - Further detailed methodologies regarding recording techniques, small-finds, policy and treasure will need to be included in any site-specific mitigation WSIs.
- 3.11 Section 10.2: Although the exact excavation sampling strategy for SMS areas will be determined following the initial strip, all recording methodologies as required for SPE will still apply and so should be included in this section. Further detailed methodologies regarding recording techniques, finds, small-finds policy, human remains, and treasure will need to be included in any site-specific mitigation WSIs. Provision for metal detecting (by a suitably experienced metal detectorist) to be undertaken as part of any SMS works should be made. The need for reporting also needs to be set out.
- 3.12 Section 10.3: Details of appropriate recording methodologies should also be included in the section in relation to archaeological monitoring. Further detailed methodologies regarding recording techniques, finds, small-finds policy, human remains, and treasure will need to be included in any site-specific mitigation WSIs.
- 3.13 Paragraph 148: This section needs to be clearer with regards to the fact that whilst excavation depths will be determined by the specifics of development works in these areas and not archaeological levels, that the monitoring archaeologist would need to be present during all groundworks taking place within agreed archaeological monitoring areas and that they must have full control in being able to pause works as required in order to allow archaeological investigation and recording as appropriate, with sufficient time allowed to enable this work to be completed.
- 3.14 Paragraph 164: A Statement regarding Treasure finds should be included here
- 3.15 Section 10.6 As well as site specific reporting, an Updated Project Design for the whole project needs to be prepared upon completion of the individual Post-

Excavation Assessments, providing a scope and programme for the analysis, reporting, publication and dissemination of the findings. This should bring together the results of all stages of the archaeological project and provide a framework for further investigation of the material recovered and results from all parts of the scheme, in order to facilitate a project wide analysis, reporting and publication strategy to be developed.

3.16 Section 10.7 Newsletters and articles in popular publications should also be considered as part of the outreach strategy for the project.

4. Responses to any further information requested by the Examining Authority for this deadline

4.1 Not applicable