



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 5 – 3 February 2021

**Comments of Suffolk County Council as Archaeological Authority**

**1. Post hearing submissions including written submissions of oral case (if required) and submissions if there are any outstanding matters requiring to be heard**

1.1 Please see below under item 3.

**2. Comments of Representations in relation to the additional land sought by the Applicant**

2.1 SCC would advise that there are no specific archaeological concerns with regards to the additional land sought by the Applicant. However, these areas should be included within ongoing archaeological assessment work and scoped in for archaeological mitigation.

**3. The Applicants revised draft Development Consent Order**

3.1 In advance of ISH6, the Applicant proposed the amended wording below for Requirements 19 and 20, in line with SCC comments (ESC and SCC LIR appendix 2 and SCC Deadline 4 submission). SCC are generally in agreement with regards to the proposed amended wording of Requirement 19 but would recommend the addition below (in red), in order to ensure that works are carried out in line with all relevant documents. SCC support the proposed amended wording of Requirement 20.

***Pre-commencement archaeology execution plan***

19. (1) *No intrusive onshore preparation works (including pre-commencement archaeological surveys, archaeological investigations or site preparation works in respect of such surveys or investigations) may be carried out until a pre-commencement archaeology execution plan (which accords with the outline pre-commencement archaeology execution plan and the outline written scheme of investigation (onshore)) in respect of those works has been submitted to and approved by Suffolk County Council in consultation with the relevant planning authority.*

(2) *Intrusive onshore preparation works must be carried out in accordance with the approved plan.*

***Archaeology***

20. (1) *No stage of the onshore works may commence until for that stage a written scheme of archaeological investigation (which accords with the outline written scheme of investigation (onshore) and is informed by the pre-commencement archaeological surveys) has, after consultation with Historic England, been submitted to and approved by Suffolk County Council in consultation with the relevant planning authority.*

(2) *In the event that site investigation is required, the scheme must include details of the following—*

- (a) *an assessment of significance and research questions;*
- (b) *the programme and methodology of site investigation and recording;*
- (c) *the programme for post investigation assessment;*
- (d) *provision to be made for analysis of the site investigation and recording;*
- (e) *provision to be made for publication and dissemination of the analysis and records of the site investigation;*
- (f) *provision to be made for archive deposition of the analysis and records of the site investigation; and*
- (g) *nomination of a competent person or persons/organisation to undertake the works set out within the written scheme of investigation.*

*(3) Any archaeological works or watching brief must be carried out in accordance with the approved written scheme of archaeological investigation for that stage.*

*(4) In the event that site investigation is required, the site investigation and post investigation assessment must be completed for that stage in accordance with the programme set out in the written scheme of archaeological investigation and provision made for analysis, publication and dissemination of results and archive deposition secured for that stage.*

3.2 Comments previously provided by SCC on other elements of the revised draft Development Consent Order with regards to archaeological requirements (ESC and SCC LIR appendix 2) have not yet been addressed within the revised draft DCO (as highlighted at Deadline 4). These are:

- The DCO defines the Outline WSI as ‘the document certified as the outline written scheme of investigation (onshore) by the Secretary of State for the purposes of this Order...’, although there is no reference to what the WSI is for – a reference to archaeology should be added.
- Points 13 on pages 69, 73, 85 and Point 16 on page 79 of the draft DCO regarding the right to remove artefacts are intended to allow archaeological work to go ahead, but the wording potentially undermines the precautionary approach as worded regarding preservation in situ where remains are significant, as it reduces the considerations down to cost.

#### **4. Any revised/updated Statements of Common Ground (if any)**

4.1 Not applicable

#### **5. Comments on any additional information/submissions received by Deadline 4**

5.1 Applicants’ Comments on the Councils’ Deadline 3 Submissions-  
Document Reference: REP4-025

SCC would highlight comments made at Deadline 4 in relation to the revised draft DCO Outline Written Scheme of Investigation (WSI) Archaeology and Cultural Heritage (Onshore), submitted by the Applicant at Deadline 3. These comments and concerns have yet to be addressed.

5.2 Outline Landscape Mitigation Plan- Document Reference: REP4-015

SCC would highlight that archaeological mitigation should be undertaken prior to any agreed landscape mitigation works, including any tree planting areas.

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

6.1 Not applicable.