

From: [Albone, James](#)
To: [Norfolk Vanguard](#)
Cc: [Faulkner, Stephen](#)
Subject: ExQ Onshore Archaeology and Cultural Heritage - NCC response
Date: 03 February 2019 12:31:27
Attachments: [Vanguard_ExQ_OnshoreArchaeology_NCC.xlsx](#)

Dear Sir/Madam,

Please find attached responses to the Rule 8 Examiners Questions to Norfolk County Council regarding Onshore Archaeology and Cultural Heritage. We apologise for the lateness of this response.

Yours faithfully

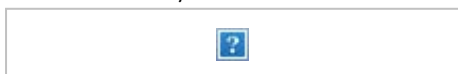
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15 Norfolk Vanguard Onshore Archaeology and Cultural Heritage

Question to:

Question:

15.2 Norfolk County Council and
Historic England

Are you satisfied that all necessary intensive evaluation, such as trial trenching, would take place post-consent and that any mitigation required as a result of this is adequately secured in the dDCO.

15.3 Norfolk County Council and
Historic England

Are you satisfied with the wording of Requirement 23 of the dDCO?

15.4 Applicant, Norfolk County
Council and Historic England

Section 28.7.2.2 of Chapter 28 of the ES [APP-352] refers to additional mitigation including the temporary suspension of works in the event of an archaeological discovery. Please comment on the likely effectiveness of this approach, particularly if intrusive groundworks are to be carried out when an appropriately qualified archaeologist is not present.

15.5 Norfolk County Council and
Historic England

Please comment on the applicability of the Offshore Renewable Protocol for Archaeological Discoveries (ORPAD) to onshore construction activities and archaeology.

NCC Response:

This has been agreed in the Statement of Common Ground between Norfolk Vanguard Limited and Norfolk County Council (Rep1-SoCG-15.1). Appropriate data collection and analysis has taken place to inform the assessment and a programme of proposed post-consent archaeological work is set out in the outline Archaeology Written Scheme of Investigation (Onshore). The implementation of the WSI is secured through Requirement 23 of the dDCO.

Yes, insofar as it ensures adequate provision for the mitigation of potential impacts on onshore archaeology and cultural heritage. However, (3) "Any archaeological works or watching brief must be carried out in accordance with the approved scheme." is, in effect, duplicated by (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 archaeological written scheme of investigation and provision made for analysis, publication and dissemination of results and archive deposition secured for that stage". In view of this we consider that, as it currently stands, (3) may be superfluous.

The appropriateness of the onshore archaeology mitigation measures has been agreed in the Statement of Common Ground between Norfolk Vanguard Limited and Norfolk County Council (Rep1-SoCG-15.1). The temporary suspension of works and reporting protocol described in Section 28.7.2.2 of Chapter 28 of the ES [APP-352] is a methodology that has been effectively employed elsewhere through appropriate briefing and training of groundworks contractors. It is not, nor is there any intention that it should be, a substitute for a phased programme of post-consent archaeological investigation and recording. Whilst the protocol would apply to all onshore groundworks for the development, areas that are assessed as having known or potential for heritage assets with archaeological interest to be present will either have been formally investigated prior to the commencement of groundworks or an archaeological contractor will be present whilst groundworks take place. Consequently the reporting protocol has greatest value in providing a 'safety net' for genuinely unpredicated, and spatially very discrete, heritage assets (e.g. an isolated coin hoard) in areas which, after appropriate initial investigations were considered to have low archaeological potential.

The appropriateness of the onshore archaeology mitigation measures has been agreed in the Statement of Common Ground between Norfolk Vanguard Limited and Norfolk County Council (Rep1-SoCG-15.1). Whilst ORPAD is primarily designed for offshore use, the basic approach that it embodies can equally be applied onshore.