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**To:** [Hornsea Project Three](#)  
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**Subject:** EN10080 - Historic England Response Deadline 4  
**Date:** 15 January 2019 15:26:39  
**Attachments:** [2019 01 15 Hornsea 3 Deadline 4 Historic England Submission FINAL.pdf](#)

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Dear Sir or Madam,

Please find attached Historic England's response to Deadline 4.

Kind regards,  
Pip

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**Hornsea 3 Deadline 4 Historic England Submission (Second Examining Authority's Questions) – 15<sup>th</sup> January 2019**

Question Ref.	Directed to	Question	Historic England's Response
Q2.7.1	Applicant	<p>The Applicant's response to Q1.12.4 [REP1-122] states that noise mitigation measures for the HVDC converter/HVAC substation are likely to include acoustic enclosures.</p> <p>What would be the maximum height of any proposed acoustic enclosure?</p> <p>Please provide illustrative details of the materials, colour and appearance of the acoustic enclosures.</p> <p>Based upon the maximum height of the acoustic enclosure, what would its implications be in terms of landscape, visual and heritage impacts?</p> <p>Should a maximum height for the acoustic enclosure be included in the design parameters of the proposed development?</p>	<p>We note that this question is directed to the applicant, but we recognise that this topic has relevance to our interests. We have concerns regarding the impact of the HVAC substation and any associated development upon the significance of the designated heritage assets, as noted in our Written Representation [REP1-107], through development within their setting, in particular through the erosion of their rural landscape context. Therefore any evidence produced in relation to this item needs to be considered from a historic environment perspective by the applicant and their heritage advisors.</p>
Q2.7.3	Applicant, SNS, NNDC	<p>The design parameters of the onshore HVDC converter/HVAC substation set out in table 3.63 of the ES [APP-058] include a proposed maximum height of 25m. The maximum height of the onshore booster station set out in table 3.62 of the ES [APP-058] would be 12.5m.</p> <p>From the information provided by the Applicant, what confidence can the ExA have that the proposed woodland planting would reach a height where it would achieve the levels of mitigation required in relation to both landscape/visual impacts and the impacts upon the setting of heritage assets?</p> <p>Based on the minimum size of trees to be planted (set out in Appendix A of the first iteration of the Outline</p>	<p>We note that this question is directed to the applicant, but we recognise that this topic has relevance to the use of mitigation measures for identified impacts to the historic environment. However, given the importance of the Outline Landscape Management Plan (OLMP) to address this matter, and subject to further consultation with Historic England in the preparation of this plan post-consent (should permission be obtained), we defer to the Local Planning Authority's advice to you regarding the OLMP as submitted for examination.</p>

		Landscape Management Plan [APP -181] for the HVDC converter/HVAC substation), the Applicant is requested to provide evidence of the expected rate of growth that would be achieved throughout the anticipated lifetime of the development for the woodland planting areas.	
Q2.8.1	Applicant	<p>The Written Representation submitted by Historic England (Hist E) at Deadline 1 [REP1-107] includes comments on the offshore Outline Written Scheme of Investigation [APP-115].</p> <p>Please provide an update on your discussions with Hist E and submit an updated offshore Outline Written Scheme of Investigation.</p>	<p>We note that this question is directed to the applicant, but we recognise that this topic has relevance to our interests. Historic England have engaged in further discussion with the Applicant in regards to the offshore Outline Written Scheme of Investigation (WSI) in the form of additional comments in a letter sent via email on 19<sup>th</sup> December 2018.</p> <p>We provided comments on our expectations and additional detail that would need to be included within the WSI as it is progressed towards a final version post-consent, subject to consent being granted.</p>
Q2.8.3	Applicant	<p>At ISH4 the Applicant explained that the design parameters for the HVDC converter/HVAC substation had been based on technical requirements taking into account land take and topography.</p> <p>Please provide further technical evidence to justify the maximum proposed design parameters for the HVDC converter/HVAC substation, including but not limited to the maximum height of 25m.</p> <p>How have the maximum design parameters (including both size and positioning) evolved in order to minimise the impacts upon the setting of heritage assets along with landscape and visual impacts?</p>	<p>We note that this question is directed to the applicant, but we recognise that this topic has relevance to our interests. As you will be aware from our submissions to date, Historic England has consistently raised concerns about the impact of the substation upon the significance of a number of the designated heritage assets. Due to the use of the Rochdale Envelope approach we do not consider the applicant has modified the design to take into consideration the Historic Environment.</p>
Q2.13.7	Applicant	<p>The Applicant has agreed to include Historic England as a consultee for Requirement 8 (provision of landscaping). Please review the outline Landscape Management Plan with a view to ensuring that it captures any objectives which relate to mitigating impacts on heritage assets.</p>	<p>We note that this question is directed to the applicant, and we welcome further involvement in the preparation of the OLMP.</p>
Q2.13.12	Applicant	<p>In Part 1 should the definition “statutory historic body”</p>	<p>We note that this question is directed to the applicant, but</p>

		<p>refer to the Historic Buildings and Monuments Commission for England (rather than Historic England)?</p>	<p>it is relevant in this instance that we clarify how our official title under the National Heritage Act 1983 is the Historic Buildings and Monuments Commission for England, and therefore this name should be used in all legal documents, such as the draft Development Consent Order.</p>
<p>Q2.13.19</p>	<p>Applicant, HE</p>	<p>Hist E has suggested [REP3-102] an additional paragraph (vii) in Condition 13(1)(d) relating to spatial data for Archaeological Exclusion Zones and application of a Protocol for Archaeological Discoveries. Condition 13(2)(h) relates to a protocol for reporting archaeological discoveries.</p> <p>Would the wording suggested by Hist E result in duplication?</p> <p>Would the submission of spatial data relating to the Archaeological Exclusion Zones be covered by Condition 13(2)(d)?</p> <p>Are any amendments to Condition 13(2) needed to ensure that submission of spatial data is secured?</p>	<p>Our recommendation in regards to additional text as provided within our further written representation [REP3-102] relates to the need for archaeological considerations to be included within a project management and monitoring plan, as referenced within the DCO. This is to provide clarity for post-consent project staff and any contractors (and/or subcontractors), to ensure that official project documentation, produced as a condition of consent, includes all necessary requirements to avoid, minimise and mitigate impacts to the marine historic environment, by creating stronger links between documents.</p> <p>The inclusion of these provisions within the project management and monitoring plan should ensure that a single document references all consent requirements and therefore prompt referral to an archaeological WSI (to be produced post-consent in reference to the outline WSI provided within the Application) for further detail.</p> <p>As such, we do not have any amendments to Condition 13(2) to suggest at this time, as we recommend the addition to Condition 13(1)(d) in its place.</p> <p>Furthermore, we wish to highlight the disparity between the reference within the DCO to a project management and monitoring plan within Condition 13(1), and the submission, as a part of the applicant for consent, of an “In Principle Monitoring Plan” by the Applicant. We recommend that a clear explanation is provided if two separate plans are to be produced to prevent any further</p>

			confusion.
Q2.13.21	HE	<p>You have suggested [REP3-102] that the timescale provided for in Condition 14(1) for the submission of plans, scheme and protocols should be amended to 6 months, to ensure alignment with the production of the Written Scheme of Investigation.</p> <p>Given that the Written Scheme of Investigation may inform the plans submitted, why is it appropriate for these time periods to be aligned?</p>	<p>It is essential that the WSI is effectively imbedded into other relevant project documentation so that it can inform work programmes enacted by project contractors and sub-contractors especially survey contractors. However, it is equally essential that the development of the WSI occurs alongside the production of other plans, schemes and protocols produced under Condition 14(1), as these other plans hold information relevant to the development of the WSI. For instance, timeframes for future survey work and construction programmes.</p>
Q2.13.24	Applicant	<p>Hist E has suggested [REP3-102] an additional paragraph (f) in Condition 19(2) relating to the submission of bathymetric and side scan sonar coverage of Archaeological Exclusion Zones, together with an archaeological analysis of the data. Please comment on this suggestion.</p>	<p>We note that this question is directed to the Applicant and we welcome further discussion with them as necessary to address our advice.</p>
Q2.13.26	Applicant	<p>Given that cable installation may require foreshore excavation, should Condition 14(2)(f) include reference to the Relevant Local Authority?</p>	<p>We appreciate that this question is directed to the Applicant, but we offer the advice that for any part of the Development Order area that falls within the jurisdiction of a terrestrial planning authority, that reference is made to the Relevant Local Authority.</p>
Q2.15.5	NNDC, BDC, SNS, NCC, NE	<p>The Applicant has submitted a revised Outline Code of Construction Practice (CoCP) [REP1-142].</p> <p>Are there any further revisions or additions that you consider should be made to this document?</p> <p>If there are, please provide justification for this and suggest any new/amended wording that may be required.</p>	<p>We note that this question is directed to the applicant, Nature England, and relevant Local Planning Authorities, but we recognise that this topic has relevance to our interests. Historic England requests that the Outline Code of Construction Practice includes reference to the importance and significance of the Historic Environment, the need for mitigation and specific reference to the onshore and offshore WSI</p>