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To: [Thanet Extension](#)
Cc: [REDACTED]
Subject: Historic England's Written Representation for Thanet Extension Offshore Wind Farm application.
Date: 15 January 2019 17:16:00
Attachments: [2019-01-15 Thanet.Ext_OWF-Historic England Written Representaion for PINs.pdf](#)

Dear Examining Authority,

Attached is Historic England's Written Representation for Deadline 1 (15th January 2019) in respect to the application made by Vattenfall Wind Power Limited for an Order Granting Development Consent for the Thanet Extension Offshore Wind Farm.

Best regards

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Historic England

**PLANNING ACT 2008 (AS AMENDED) – SECTION 88 AND THE
INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010 (AS
AMENDED) - RULE 6**

**APPLICATION BY VATTENFALL WIND POWER LTD FOR AN ORDER GRANTING
DEVELOPMENT CONSENT FOR THE PROPOSED THANET EXTENSION
OFFSHORE WIND FARM**

APPLICATION REF: EN010084

**REPRESENTATIONS OF THE HISTORIC BUILDINGS AND MONUMENTS
COMMISSION FOR ENGLAND (HISTORIC ENGLAND)**

REGISTRATION ID No. 20012618

DATED: 15 JANUARY 2019



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1. Introduction

- 1.1. The Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England, is the Government's statutory adviser in relation to the historic environment in England. It was set up by the National Heritage Act 1983, and the National Heritage Act (2002) gave HBMCE responsibility for maritime archaeology in the English area of the UK Territorial Sea. HBMCE are a Non-Departmental Public body sponsored by the Department for Digital Culture, Media and Sport (DCMS). Our remit in the historic environment intersects with the policy responsibilities of a number of other government departments – particularly the Ministry of Housing, Communities and Local Government, with their responsibilities for land use planning matters.
- 1.2. In previous correspondence in relation to this project application, via our Planning Inspectorate Registration and Relevant Representation Form (dated 12 September 2018) we summarised eight points, covering onshore designated Heritage Assets and non-designated Heritage Assets & archaeology. As well as offshore matters in relation to the draft Written scheme of Investigation (WSI), the Draft DCO (Document Reference 3.1) and comments relevant to the wider region of the proposed development, namely the Goodwin Sands to the south of the proposed export cable route.
- 1.3. This letter therefore expands and elaborates on these points and addresses other matters relating to the onshore and offshore historic environment, as set out in the following Environmental Statement (ES) documents and chapters:
 - Volume 1 Chapter 3: Environmental Impact Assessment Methodology - Document Reference: 6.13
 - Volume 2 Chapter 2: Marine Geology, Oceanography and Physical Processes - Document Reference: 6.2.2
 - Volume 2, Chapter 13: Offshore Archaeology and Cultural Heritage (Application Ref 6.2.13);
 - Volume 3, Chapter 2: Landscape and Visual Impact Assessment (Document Ref: 6.3.2)
 - Volume 3, Chapter 7: Historic Environment (Application Ref 6.3.7);
 - Volume 4, Annex 13.1 and Annex 13.2 technical baseline documents (Application Refs 6.4.13.1 and 6.4.13.2 respectively);
 - Application document 3.1 Draft Development Consent Order (Application Ref 3.1);
 - Application document 8.6 Offshore Written Scheme of Investigation (Application Ref 8.5).



2. Comments in relation to Onshore - Designated Heritage Assets:

- 2.1. The following advice relates to impacts to designated onshore cultural heritage. While Historic England does not wish to raise major concerns here, we hope it will be helpful to highlight below our position on the impacts as assessed within the Environmental Statement (ES) and limited areas of disagreement where we think the level of harm is higher than suggested therein.
- 2.2. In all cases for designated heritage considered here, the effects are indirect, i.e. the change proposed is within the setting of the heritage assets. Setting is the surrounds in which a heritage asset is experienced and we are here concerned with how change might affect the ability to understand the significance of these. For this proposal the relevant part of setting is the sea and along the coast are several historic towns within which are numerous heritage assets, principally conservation areas and listed buildings. The origin of these towns often relates directly to the sea; as they began on the whole as either small fishing communities built up around a harbour or as seaside resorts when this became popular from the 18th century. In all cases the sea (as the location of the proposed development) is therefore an important element of the setting of these assets. There are historic relationships to the sea which has traditionally been a place of activity and change. However in our view changes of the scale and location proposed within that setting do not fundamentally alter an understanding or appreciation of the significance of these designated heritage assets and therefore the level of harm to their setting is agreed as being generally so low as to be not significant. There is one exception, as described below, which is Margate Conservation Area, but for this we still consider that the level of harm is low.
- 2.3. Beyond the conservation areas and the individual listed buildings within and around these, several other designated heritage assets are also assessed including the scheduled monument at Reculver Towers (the ruins of a Roman shore fort and a medieval church) and the historic lighthouses at North and South Foreland. These individual buildings and monuments were sited with a specific relationship to a piece of seascape and understanding this is part of their significance. For similar reasons to those above we also assess that the changes from the proposal will not significantly affect an understanding or appreciation of the significance of these assets.
- 2.4. In terms of our specific comments on the Environmental Statement (Volume 3, Chapter 7: Historic Environment (Application Ref 6.3.7)) we note that the levels of harm caused to onshore designated heritage assets have been amended since the PEIR report but that the list of Heritage Assets identified for assessment remains the same. We agree with the list of assets assessed (Tables 7.8 to 10),



and the methodology for assessing the harm and effect to the significance of these assets (Sections 7.4 to 7.6). We broadly agree with most of the revised levels of effect for all built designated heritage assets, which are assessed as being 'not significant' for onshore cultural heritage as per Table 7.5. However, we do not agree with the assessment of the effect and consequent harm to Margate's Conservation Area.

- 2.5. The Environmental Statement assesses the effect to Margate's Conservation Area at the 'not significant' level. We disagree with this based on the assessment of the relationship between the buildings within it to the sea. We think that although the proposed wind turbines would not cause a high or even moderate level of harm, the effect on the Conservation Area would be a low level of harm. We think that harm chiefly arises because the turbines will be visible behind the historic town in long views towards the Margate Conservation Area from West Brook viewpoint 2 (ES vol 6 SLVIA 12.28) and that this would be an incongruous addition to the view harming to a low degree an appreciation of the historic townscape within and around the conservation area. The incongruity of the turbines in this view would be accentuated by their movement. We have considered whether the harm here could be further minimised but do not think this would be achievable without significant changes to the scheme, something which we accept as not likely. We explain below the policy context for considering whether this low level of harm is justified.
- 2.6. Since the Environmental Statement was produced in June 2018, we have discussed with the applicant's heritage consultant about the impact of the proposed wind turbines on key views, including on Margate's Conservation Area. We understand that he may be minded to consider revising the effect caused in line with our opinions. If so this update is not yet included in the Environmental Statement as far as we are aware.
- 2.7. The policy context for decision taking for a Development Consent Order is set out in *Overarching National Policy Statement (EN-1)*, and for heritage in *Section 5.8*. For designated heritage this requires an applicant to show that harm to heritage significance has been avoided or minimised and that any remaining harm has clear and convincing justification (5.8.12 and 5.8.14). In this case we are satisfied that harm cannot be avoided altogether and that it is minimised by the development being a sufficient distance from the shoreline as to only give rise to low levels of harm to designated heritage. It will be for the Examining Authority to decide if the remaining harm has clear and convincing justification and to weigh that harm against the public benefits in the manner set out in section 5.8.15. We note that the strength of the justification required varies with the degree of harm. The greater the harm to the significance of a designated asset the greater the justification for this would need to be.



- 2.8. In reaching its decision the Examining Authority will also need to take into account the presumption in favour of the conservation of designated heritage with the more important the asset the greater that presumption needing to be (5.8.14). We also draw your attention to 5.8.18 which notes that “when considering applications for development affecting the setting of a designated heritage asset, the IPC [Examining Authority] should treat favourably applications that preserve those elements of a setting which make a positive contribution to, or better reveal the significance of a heritage asset”. When considering applications which do not achieve this, the Examining Authority should weigh any negative effects against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify any approval.

3. Comments in relation to Onshore Non –designated Heritage Assets – archaeology:

- 3.1. The proposal also has the potential to cause harm to onshore buried archaeological remains, either as a result of direct effects or for indirect effects, such as by change within setting. There are no designated archaeological heritage assets (scheduled monuments) directly affected by the proposal and the effect on the setting of monuments, such as Reculver Towers, is discussed above and considered not to be significant. This leaves as a consideration any effects on non-designated archaeological heritage assets and their settings. The Heritage Conservation team at Kent County Council is best placed to provide advice about how such assets should be assessed and treated as part of this proposal and Historic England is content that they should lead for such issues. Our remit is strongest for any archaeological remains that may be of national importance such that they have a level of significance comparable to a scheduled monument, in which case they should be treated as if they have that protected status. Assessment to date has not confirmed that nationally important archaeological remains will be harmed by the proposal but a potential for this remains at this stage in the DCO process.
- 3.2. We hope that the following comments are of assistance in helping consider the likely archaeological effects of the onshore elements of the proposal and in determining how any DCO granted might provide a robust and policy compliant framework for resolving such issues. We acknowledge that much detailed design work will take place post determination and so any DCO must provide the mechanisms to avoid, minimise, or mitigate harm to buried terrestrial archaeological remains once the precise effects on these can be described and considered. As the presumption should be that any nationally important archaeological remains should wherever possible be preserved *in-situ* and not



excavated the proposal needs to demonstrate it has flexibility in its detailed design so as to potentially allow for this.

- 3.3. Excavation is itself a destructive process and can prove costly for the developer. Avoidance of harm to buried remains should be the first aim. For archaeological remains of a local or regional level of significance the project might still wish to consider how to avoid or minimise construction impacts through its detailed design decisions. Where archaeological investigation is unavoidable or considered appropriate then delivering new understanding of the historic environment affected by the proposal is a key part of mitigating harm. Any DCO granted needs to secure not just provision for excavation to recover archaeological information but also subsequent activities to assess, analyse, publish and curate the significance of the data obtained. This is an important component of the balance for how harm to archaeological remains might be weighed against the benefits of permitting works. Delivering enhanced or new understanding is a public benefit to form part of that process.
- 3.4. We are broadly content with Condition 22 (Part 3, Schedule 1) within the draft DCO, which requires that a written scheme of investigation (WSI) for onshore archaeological mitigation be submitted and approved by Historic England and Kent County Council in advance of the development. We advise that further archaeological assessment, carried out post determination of the DCO, should inform the content of this WSI and that consideration should be given to avoiding or minimising harm to all archaeological remains through detailed design or construction decisions. We recommend that the condition include a specific requirement for geo-archaeological issues and mitigation to be included within this WSI (see below).
- 3.5. The landfall site for the wind farm is at Pegwell Bay which is at the eastern end of the former Wantsum Channel as the once open water which separated the Isle of Thanet for the Kentish mainland. It is also where the River Stour reaches the sea and an area that has been subject to complex past coastal processes. These factors combine to make this part of Kent highly significant for what geo-archaeological studies can tell us about the history of the environments lived in and created by our predecessors. Such information is recoverable from the sometimes complex deposits that might be impacted upon by construction of this proposal. Appropriate mitigation for this impact will need to be specified as part of the WSI for onshore archaeology. It should be noted that the current availability of geo-archaeological data is disparate for the area; meaning any future investigation of geo-archaeological deposits as part of mitigation for this development should therefore be undertaken with the aim of contributing to an overall, integrated deposit model for the Wantsum Channel Area.



- 3.6. At Pegwell Bay itself there is enhanced potential for the presence of archaeological remains and further assessment is required in order to explore that potential, to understand the significance of any archaeological remains present and to inform an appropriate response to any impacts upon that significance arising from the development. Specifically we wish to highlight the potential for 20th century anti-invasion defences and for buried archaeology relating to the identification of this area as a site for the possible Caesarian invasion in 54/55 BC. Such remains may at present be buried or concealed by vegetation and further assessment is therefore required to establish if such remains are indeed present, and to what extent they may be impacted by the scheme.
- 3.7. The current scheme proposes that any harm to such assets be mitigated through recording, but due to the potential importance of these our view is they might need to be preserved *in-situ* (including by adjustment of the cable route if needed). We therefore also recommend that the draft DCO includes a separate condition which requires further assessment, survey and possible evaluation of the potential for 20th century defences and early Roman period archaeology at Pegwell Bay. The detailed specification for such further assessment should be discussed and agreed with the Heritage Conservation team at Kent County Council. Historic England is ready to provide further advice, should this be necessary, as to the significance of any archaeology so identified and as to what would be an appropriate response to avoiding or minimising harm. If evidence from a Roman invasion was to be identified this has a high potential to be nationally important and the most appropriate response to this could be preservation *in-situ* and not excavation. It is possible that other nationally important types of archaeology might also be identified but assessment is needed to be clearer about this and what the appropriate response might then be.

4. Comments in relation to Environmental Statement Volume 2, Chapter 13: Offshore Archaeology and Cultural Heritage:

- 4.1. Comments we provided to the Thanet Extension Offshore Wind Farm – Preliminary Environmental Information Report (Volume 2 – Chapter 13: Offshore Archaeology and Cultural Heritage Volume 4, Annex 13-2 – Offshore Archaeology Geophysical and Geotechnical Report) for the consultation exercise under Section 42, have been included in Table 13.2: Summary of consultation relating to Offshore Archaeology and Cultural Heritage.
- 4.2. Whilst we are generally satisfied that our comments have been sufficiently addressed (helpfully recorded in the third column of this table), there are a series of points detailed below for which we would like to emphasise and attain some



additional clarification on, which we hope will enable the Examining Authority to formulate a decision.

- 4.3. We note from 'Table 13.1: Legislation and policy context' the listed relevant policies, supported by detail on their particular key provisions and the corresponding section's in which such provisions are addressed. As such we found this to be comprehensive and well informed, representing current and applicable policy, especially in the absence of a marine plan for the area of this proposed development. In addition the guidance listed paragraph 13.2.5 is also of an acceptable standard.
- 4.4. We note that potential impacts from the development have been identified in Sections 13.11, 13.12 and 13.13 within the Environmental Assessment for the construction, operational & maintenance, and decommissioning phases. These include direct and indirect effects upon known and potential marine archaeological receptors. As such we found this component of the ES to be detailed with well supported information on each receptor, proportionate to the scale of the project, as defined within the maximum adverse scenario (Table 13.11).
- 4.5. The assessment criteria and assignment of significance, (as summarised in ES Volume 2, Chapter 13: Offshore Archaeology and Cultural Heritage – paragraph 13.5 Assessment criteria and assignment of significance) is proportionate, and framed correctly around relevant policy, specifically Overarching National Policy Statement for Energy (EN-1) (DECC, 2011). Additionally applicable guidance has been sought.
- 4.6. We do however note that paragraph 13.5.9 contains the statement that "*The nature of the archaeological resource is such that there is a high level of uncertainty concerning the distribution of potential, unknown archaeological remains on the seabed. It is often the case that data concerning the nature and extent of sites is out of date, extremely limited or entirely lacking. As a precautionary measure, unknown potential cultural heritage receptors are therefore considered to be of high sensitivity and high value*". To support this determination for all receptors relevant to the marine historic environment it is important that section 13.5 of the ES considers the basis for assessment criteria and assignment of significance relevant to prehistoric archaeological remains also. Whilst we note subsequent reference in paragraph 13.7.13, and within the Annex 13-1: Marine Archaeological Desk- Based Assessment Technical Report (Document Reference: 6.4.13.1) is made in this regard, it's inclusion in section 13.5 would enable the chapter to function effectively in its summarised form.



- 4.7. Reference to the North Sea Prehistory Research and Management Framework (2009) as well as the Historic England advice note *Identifying and Protecting Palaeolithic Remains: archaeological guidance for planning authorities and developers* (1998) may therefore be helpful in this instance.
- 4.8. The provision of embedded mitigation as summarised within Table 13.12, through a project archaeological written scheme of mitigation and archaeological exclusion zones (AEZ) are a standard industry approach. We understand that the AEZs are recommended around known features of anthropogenic origin of archaeological interest (A1 anomalies) and historic records of archaeological material (A3 anomalies), and no works that disturb the seabed will be undertaken within the extent of an AEZ.
- 4.9. However, as we stressed in our PEIR response the sheer quantity of geophysical seabed anomalies highlights the high potential for significant features of the historic environment to reside on or under the seabed of the proposed development area (totalling 1,027 considered of uncertain origin of possible archaeological interest). Therefore should consent be granted the developer should consider and address how the offshore wind farm components and associated infrastructure can be designed sensitively taking into account known and potential heritage assets (Overarching National Policy Statement for Energy (EN-1) (July 2011), paragraphs 5.8.5, 5.8.22 & National Policy Statement for Renewable Energy Infrastructure (EN-3) paragraph 2.6.144).
- 4.10. As you will be aware the National Policy Statement for Renewable Energy Infrastructure (EN-3) (July 2011) states the that the assessment should also include the identification of any beneficial effects on the historic marine environment, for example through improved access or the contribution to new knowledge that arises from investigation (paragraph 2.6.142). In relation to this matter we note a number paragraphs (8 in total) throughout the ES chapter elaborate upon how relevant benefits can be fully achieved through the stages of survey and design processes.
- 4.11. As a specific point of note, an important element retained within Thanet Council's aspirations for 2031 is for "*a sustainable, balanced economy with a strong focus on advanced manufacturing, emerging technologies, tourism, culture and leisure, supported by the three thriving coastal towns*" (Thanet District Council Draft Local Plan to 2031 – July 2018). Additionally the ES (Tourism and Recreation – Document Ref: 6.3.4, paragraphs 4.7.16 to 4.7.18) outlines Ramsgate as a popular location for diving shipwreck sites due to its ease of access to the Dover Strait. Therefore should newly recorded heritage assets of interest be revealed from the survey results, and they are managed and published appropriately, they have the potential to be a catalyst for some small scale regeneration in an area,



particularly through leisure, tourism and economic development (footnote 122, Overarching National Policy Statement for Energy (EN-1) (July 2011)). Therefore the project may enable the marine historic environment to be promoted and enjoyed as a recreational resource, whilst giving rise to tangible potential social and economic benefits for the local community.

- 4.12. With regard to the coverage of geophysical coverage and quality we understand that along the export cable route there are data gaps between the geophysical survey data assessed for Thanet Extension and the consenting geophysical survey data acquired from Nemo Link cable interconnector. Additionally that the data integrated from Nemo Link is of a lower resolution (paragraphs 13.6.2 and 13.4.26).
- 4.13. We are also mindful that the assessment of geophysical survey data did not cover the 500m turning circles. However it is unclear what specific areas this relates to, as the only reference to such locations states that they are represented in Figure 13.1 as “*grey boundaries related to the Site Investigation Boundary*”, which isn’t altogether apparent. Whilst we are content with the data coverage and quality used to perform for characterisation purposes for the application, in relation to the subsequent figures it is however uncertain whether the proposed turbine locations on the outer edge of the development have sufficient surrounding coverage. Therefore - subject to development consent - as the project designs progress and formalise, such detail will need to be addressed, through an agreed WSI.
- 4.14. We confirm that cumulative effects on known and potential marine archaeological receptors has been considered within the ES; defined as combined impacts from a number of other development projects on the same receptor and incremental changes over time and over a wide area. We accept that impact from other projects are unlikely due to distance, and indirect impacts from Thanet Offshore Wind Farm are localised, with incremental changes over time managed through standard mitigation measures across the EIA process (13.14 Environmental assessment: cumulative effects and Table 13.17: Summary of predicted impacts of Thanet Extension). Therefore any residual impact would be Minor to Negligible adverse.

5. Comments in relation to The Thanet Extension Offshore Wind Farm Order 201X, Draft Development Consent Order (DCO) including Draft Deemed Marine Licences (Document Reference 3.1):

- 5.1. We note the Deemed Marine Licences (DMLs) are set out in Schedules 11 (Generation Assets) and 12 (Export Cable System) of the DCO. Our comments on the DCO and these DMLs are as follows.



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- 5.2. All references to the Outline Written Scheme of Investigation (WSI) should define whether they are in reference to onshore or offshore WSI.
- 5.3. The definition of ‘commence’ is presented within Part 1, Section 2(1) as “(a) *in relation to works seawards of MHWS, the first carrying out of any licensed marine activities authorised by the deemed marine licences, save for operations consisting of offshore site preparation works, pre-construction monitoring surveys approved under the deemed marine licences, and (b) in respect of any other works comprised in the authorised project, the first carrying out of any material operation (as defined in section 155 of the 2008 Act) forming part of the authorised project other than site preparation works and the words “commencement” and “commenced” must be construed accordingly*”. We disagree with this definition and request that the term commencement includes both pre-construction monitoring surveys and site preparation works, in order to ensure the consistent production, agreement and implementation of the offshore WSI prior to such works. This would not only ensure adequate mitigation measures are developed for site preparation works, but ensure that the survey data are incorporated into the development of mitigation strategies. This should therefore be amended within this paragraph, and within the definitions listed in Schedule 11, Part 1, Section 1, paragraph 1 and Schedule 12, Part 1, Section 1, paragraph 1.
- 5.4. The definition of “statutory historic body” as listed within Schedule 11, Part 1, Section 1, paragraph 1 and Schedule 12, Part 1, Section 1, paragraph 1 is given as ‘Historic England or its successor in function’. This should be amended to the ‘Historic Building and Monuments Commission for England’ to avoid confusion.
- 5.5. We note that Schedule 11, Part 2, Section 4 and Schedule 12, Part 2, Section 4 describes the operation and maintenance works that to be included under the DMLs. Whilst we have no objects to this approach, suitable provisions must be included within the WSI for mitigation of impacts during operation and maintenance works.
- 5.6. The provisions for the production and agreement of a Written Scheme of Investigation are set out in Section 10(1) of Part 2 of Schedules 11 and 12. Aside from the issue with commencement, as described above, we are largely content with the provisions set out. However, we request that consideration is given to the inclusion of archaeological mitigation within Schedules 11 and 12, Part 2, Section 15 in order to monitoring the effectiveness of the mitigation measures applied.



- 5.7. Additionally to form a consistent approach to the onshore and offshore WSI's function we request that the following is included within Section 10(1)(i) of Part 2 of Schedules 11 and 12: "In the event that site investigation is required, the scheme must include details of an assessment of significance and research questions".
- 5.8. Schedule 11, Part 1, Section 4 (h). As of the 1st April 2019 the Historic England office to contact will be: 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA, 020 7973 3700.
- 5.9. Please see comment 3.7 above regarding the recommendation for the draft DCO to include a separate condition which requires further assessment, survey and possible evaluation of the potential for 20th century defences and early Roman period archaeology at Pegwell Bay.

6. Comments in relation to the Offshore Archaeology Draft Written Scheme of Investigation (June, 2018, Revision A), Document Reference: 8.6:

- 6.1. With regard to the relevant Archaeological Curator at Kent County Council (KCC) (paragraph 4.3.3) above the Mean Low Water Mark (MLWM), it would be worth checking the listed contact is correct.
- 6.2. We would like to see a timeframe included within paragraph 9.1.2, related to method statements covering schemes of investigations (section 9.). We request that such method statements should be submitted to the Archaeological Curator(s) for comment one month to the planned commencement of the survey, in order to allow for sufficient time for the review and any amendments to be completed and agreed.
- 6.3. Moreover the reporting of such surveys completed will need to be provided to Historic England for review in good time prior to construction, such that adequate consultation can be addressed where necessary. We therefore welcome the stated intention in paragraph 4.1.1 for mitigation measures required for this project must be undertaken, completed and reported on in time to inform the final engineering design.
- 6.4. Additionally within section 4.2 'Retained Archaeologist' we request that provision is included for the retained archaeologist to be provided with all relevant project datasets such that they are in an informed position to advise the project team. The justification for this is that on other marine consented national infrastructure projects the appointment of a new retained archaeologist post-consent, who may be relatively unfamiliar with the project, can present an interval of inconsistency and full engagement. However it can also bring about a fresh and enthusiastic



outlook also. Therefore the applicant should be minded to make relevant data accessible at the earliest opportunity on contractually agreeing terms with the retained archaeologist.

- 6.5. Furthermore, during construction, due to the need for a seamless, active and accessible archaeological contractor required for the effective delivery of the protocol for archaeological discoveries, it is our expectation that the retained project archaeologists (if they differ from the application phase) should cover the administration of the reporting of discoveries and provide advice about immediate actions (including recording, handling and storage, and introduction of measures to prevent or reduce damage if the presence of a significant archaeological site is suspected). As such the full role and responsibilities are outlined in The Crown Estate, 2014, Protocol for Archaeological Discoveries: Offshore Renewables Projects, Section 5.
- 6.6. In a response letter to the PEIR (dated to 12th January 2018) and in our Section 56 Representation (dated 12th September 2018) we raised concerns that due to the large number of geophysical anomalies recorded (north of the Goodwin Sands) and the limitations of marine geophysical equipment to accurately penetrate mobile sediment to the maximum depths proposed for the export cable burial (1 to 3m), significant buried material may be contained. We have since discussed this matter with the applicant and note within paragraph 6.2.2 our concerns have been reflected accordingly. Accordingly a strategy of evaluating such potential is therefore necessary either through un-intrusive survey methods of trial trenching.
- 6.7. Section 9.6 'Marine geoarchaeological investigations' subheading Further geotechnical sampling would benefit from detailing that the future method statement should include clear provisions for the development of a collection, retention and storage strategy for cores to allow for analysis to take place. Reference to collecting cores using light-proof sleeves, and the need for cores to be stored and split under safe-light (dark) laboratory conditions would also be helpful in preserving the integrity of deposits of a certain age.
- 6.8. National and regional research aims should be considered and included where appropriate.

ENDS

