



Historic England

Members of the Panel of Examining Inspectors
for Thanet Extension Offshore Wind Farm
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our ref: OWF/Thanet Ext.
PINs ref: EN010084

Registration
ID No.: 20012618

28 May 2019

Dear Panel of Examining Inspectors,

Please find below the written submissions from Historic England for Deadline 6: Tuesday 28 May 2019.

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Digital, Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Written submission – Examining Authority's third written questions and requests for information (ExQ3) - Issued on 16 May 2019.

3.4 Draft Development Consent Order (DCO)

Question: 3.4.1. Historic England

Changes to drafting regarding archaeological investigation

Would Historic England please confirm if the dDCO [REP5-019] submitted at Deadline 5 has now been amended to their satisfaction as follows:

- a) Changes to Schedule 11 and Schedule 12 (DMLs) to 'enable the interrelationships between onshore and offshore [Written Schemes of Investigation] WSIs to work as clearly and effectively as possible where the export cable meets landfall, whereby a strategic overlap is captured...'
- b) clarification regarding inclusion in the DCO of a condition on dredge disposal (Schedule 11 condition 22, Schedule 12 condition 24) and the relationship between these and the Offshore WSI.



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- c) definition of 'commence' in relation to works seaward of MHWS to include both pre-construction monitoring surveys and site preparation works.

Response:

With regard to the specific comments made by the ExA for additional consideration, we have the following comments to make.

a) During the examination period Historic England has reviewed and issued substantial comments to the Applicant and their archaeological contractor on the Onshore and Offshore Written Schemes of Investigation. We consider that the content within both documents is sufficient to account for the challenges of the working environments within the intertidal zone, and the archaeological deposits and assemblages they may contain. Amongst other areas of the two WSIs, examples of how the documents functions in this regard includes sections 5.2 'Intertidal zone' and 6.2 'Stage 1' of the *D4_61.40 Onshore Archaeology - Written Scheme Of Investigation (version C)*, and section 4.6 'Stakeholder Liaison' and paragraph 9.6.12 of the *8.6 Offshore Archaeological Written Scheme of Investigation (version C)*.

Since our last submission it has also come to our attention that the inclusion of condition 12 (2) states:

"Any pre-commencement works of an intrusive nature must not take place prior to the approval of the onshore written scheme of investigation submitted in accordance with sub-paragraph (1)". We consider when noted in conjunction with the referred to above sub-paragraph (1) issues acceptable provisions - subject to consent - covering activities, intrusive and non-intrusive, within all areas of the permitted development up to mean high water springs.

b) Although there are clear conditions stipulating accordance with the offshore WSI, the use of the phrase of 'disposed of on land' in the context of this particular condition is somewhat confusing. We would like to have this point clarified by the Applicant, alternatively could the text be amended as follows:

"(2) Any man-made material, which is not deemed of archaeological interest by the reporting and recording protocol, must be separated from the dredged material and disposed of on land, where reasonably practical."

c) We are satisfied with the definition of 'commence' in relation to works seaward of MHWS, given the definition of 'pre-commencement' and the associated provisions within the draft DCO. Additional comments relating to this point and to 3.4.1 a) above, have been included within our submission on Tuesday 28 May 2019 on the Examining Authority commentary on the draft DCO.

**Question: 3.10.3. Historic England
Draft Onshore WSI**

Would Historic England and Kent County Council please confirm if they are satisfied with the [REP5-006] revised Draft Onshore WSI submitted at Deadline 5..:



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Response:

We can confirm that Historic England is satisfied with the [REP5-006] revised Draft Onshore WSI submitted at Deadline 5. We can also confirm that the content and approach described in all sections of the WSI which are specifically mentioned within the Examining Authority's Question 3.10.3 a)-h) is appropriate.

Yours sincerely



Stuart Churchley
Marine Archaeological Planning Officer

CC:

Maria Buczak (Historic England, Assistant Inspector of Ancient Monuments)
Alice Brockway (Historic England, Inspector of Historic Buildings and Areas)
Isabelle Ryan (Historic England, Assistant Inspector of Historic Buildings and Areas)



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