



Historic England

Norfolk Boreas Project Team
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

10th December 2019

Dear Ms Fernandes,

**Application by Norfolk Boreas Limited for the Norfolk Boreas Offshore
Windfarm
The Examining Authority's written questions and requests for information
(ExQ1) Issued on 19 November 2019
Planning Inspectorate Ref: EN10087
Our Registration ID: 20022672**

The Historic Buildings and Monuments Commission for England (known as Historic England) is the Government's advisor on all aspects of the historic environment in England. Historic England's general powers under section 33 of the National Heritage Act 1983 were extended (via the National Heritage Act 2002) to modify our functions to include securing the preservation of monuments in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England. We also provide our advice in recognition of the English marine plan areas (inshore and offshore) as defined by the Marine and Coastal Access Act 2009, the UK Marine Policy Statement and National Policy Statements.

Further to receipt of your letter and the first set of written questions (dated 19th November 2019) we hereby offer the following response to those questions directed to Historic England.



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Correspondence or information which you send us may therefore become publicly available.

Q1.0.1 – Draft DCO and DML Archaeological WSI in intertidal zone

- 1) *Does the dDCO adequately cover archaeological requirements regarding the intertidal zone? (The onshore Archaeological WSI extending to Mean High Water is secured by dDCO Requirement 23.)*

Response: By convention the intertidal zone falls within the realm of a deemed Marine Licence rather than an onshore Archaeological Written Scheme of Investigation. However, in this situation it is made clear by the Applicant that intrusive intertidal works to deliver the proposed project are not proposed.

- 2) *How is it proposed to secure mitigation measures for the intertidal zone included in the outline offshore Archaeological Written Scheme of Investigation? The DMLs [Schedules 10 and 12 Part 4 Condition 9(1)(h)] secure the offshore Archaeological WSI covering land seaward of Mean LOW Water which therefore excludes the intertidal zone.*

Response: We acknowledge the detail of the proposed project, as submitted as part of the DCO application, that Horizontal Directional Drilling (HDD) will be used to take the electricity export cables from a position below Mean High Water Springs to a point above Mean High Water Springs. It is therefore apparent that intrusive works within the intertidal zone are not proposed and consequently no specific methodological approaches are specified to guide archaeological assessment exercises within the outline archaeological Written Scheme of Investigation (Offshore).

- 3) *IPs to confirm they are content with the intertidal zone being excluded from the responsibilities defined via outline Onshore and Offshore Archaeological WSIs; or make suggestions for amendments, additions or deletions as appropriate.*

Response: An amendment is offered so that the full spatial area subject to any deemed Marine Licence is included – please see our advice in paragraph 11.2 of our Written Representation.

Q1.0.2 – Offshore Archaeological Written Scheme of Investigation

Historic England to confirm via SoCG outline offshore Archaeological WSI [APP-697] specifically regarding:

- 1) *Definition of commencement;*
- 2) *Protection for archaeology during invasive pre-commencement survey works;*
- 3) *Protection for archaeology during invasive enabling works prior to primary works;*
- 4) *Archaeological assessment of UXO survey data;*
- 5) *Archaeological data acquisition and management post-consent;*
- 6) *Procedures and timescale for notification of new discoveries;*
- 7) *Monitoring plans.*

Response: We hereby direct you to the Statement of Common Ground which addresses all the above identified matters and which is agreed with the Applicant, as signed by me, as representative of the Historic Buildings and Monuments Commission for England (PINS Document Reference: ExA.SoCG-9.D2.V1; dated December 2019).



Q1.0.3 – Acceptability of geophysical data to inform ES in offshore order limits
Given the limitations of the geophysical data that are acknowledged by the Applicant in ES Chapter 17, paragraphs 57-58, would Historic England comment on the acceptability of the geophysical data to inform the characterisation of the archaeological potential of the offshore area and hence the assessment of effects in the ES?

Response: We hereby acknowledge that those data produced for the submitted Environmental Statement are sufficient for the purpose of the examination of this application (as confirmed by our agreement to this matter in the finalised Statement of Common Ground, as referenced above). We also direct you to our Written Representation (paragraph 5.3) for our explanation of the data acquired to date for this proposed development and its utilisation for archaeological assessment purposes. We are therefore satisfied by the assessment of effects included within the ES.

Q1.0.4 – Changes to setting of offshore heritage assets and historic seascape character

Is Historic England content with the Applicant stating in APP-574: ‘The assessment of changes to the setting of heritage assets and historic seascape character section 17.7.6.4 in chapter 17) describes that a change will occur but does not provide a judgement on the significance of that impact.’

Response: We are aware that the consideration of Historic Seascape Characterisation within this section and sections 17.7.7.4 (operation impacts) and 17.7.8.4 (decommissioning) discuss matters to do with the concept of the capacity of identifiable (i.e. spatial and temporal) historic character to accommodate change. We acknowledge how they have determined significance of any impact including what might offset potential adverse impacts. It is important to highlight that a key principle in the methodological approach to producing characterisation is the concept of perception (e.g. see Chapter 17, paragraph 220); such that attention is directed towards known associations of place to give meaning to its present characteristics. We appreciate the attention given to the use of a narrative approach used in the ES and the acknowledgement where change in perception (i.e. as relevant to a particular attribute e.g. fishing) is likely to occur. We acknowledge the attention given to this matter within the Statement of Common Ground agreed with the developer. The Applicant, as a user of Historic Seascape Characterisation may then consider and establish “significance” as demonstrated, for example, within paragraph 218.

Q1.0.6 – Xanthe wreck potential designation decision

Advise on the likely timescale for a decision on whether the historic wreck site identified within the proposed project development boundary 'Xanthe', has national importance, as flagged in RR-022.

Response: We hereby confirm that the wreck of the *Xanthe* (sank 1869) is now a scheduled monument under the Ancient Monuments and Archaeological Areas Act 1979 together with the *Seagull* (sank 1868), as explained within paragraph 5.6 of our Written Representation. Please see:

- The *Seagull* – <https://historicengland.org.uk/listing/the-list/list-entry/1464587>
- *Xanthe* – <https://historicengland.org.uk/listing/the-list/list-entry/1464597>



Q1.1.1 – Outline Written Scheme of Investigation (WSI)

Are you content with the Outline Written Scheme of Investigation (OWSI) [APP-696], as secured in dDCO [AS-019] Requirement 23 in dealing with onshore archaeological matters? If not make suggestions for amendments, additions or deletions.

Response: Section 12 of Written Representation provides our detailed comments on the Outline Written Scheme of Investigation (Onshore) and we have no specific comments or other edits to offer regarding Requirement 23 within the draft Development Consent Order.

Q1.2.5 – Reference to Norfolk Vanguard

Regarding point 6. of [RR-022], ensure that any evidence that you may refer to from the Norfolk Vanguard, or any other Examination, is submitted to this Examination.

Response: This request is acknowledged and the necessary detailed provided, as necessary within our Written Representation for the Norfolk Boreas project, as presently under examination.

Yours sincerely,



Dr Christopher Pater
Head of Marine Planning



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