

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

17th December 2019

Dear Ms Fernandes,

**Application by Norfolk Boreas Limited for the Norfolk Boreas Offshore
Windfarm
Response to Deadline 3
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.

We offer the following response to those questions directed at Archaeology and Cultural Heritage as set out within First Written Questions (dated 19th November 2019) and addressed by the Applicant.



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

Q1.0.5 – Potential effects of development on submarine wreck (ES Submarine wreck 71480)

Question directed to the Applicant

Response The Applicant explains that this wreck site is located at the south eastern boundary of the proposed Norfolk Vanguard East offshore wind farm development and is therefore sufficiently distant from the proposed Norfolk Boreas development that it was excluded from assessment within the Environmental Statement. On the basis of the information presented to us in this application, we are minded to concur with the position taken by the Applicant.

Q1.0.7 – Responsibilities for military remains finds

Question directed to the Applicant

Response: It is possible that presently unknown military aircraft crash exist within the proposed development areas (turbine array, electricity export cable corridor and interconnector search area). The Applicant must therefore ensure that all programmes (e.g. unexploded ordnance risk assessment) that gather survey data (inclusive of geophysical data acquisition and visual inspection) are sufficient to support identification of seabed and sub-seabed anomalies as could indicate the presence of crashed (and highly fragmentary) aircraft materials.

Q1.1.8 – Archaeological Exclusion Zones (AEZs) in offshore works areas

Question directed to the Applicant

Response: The use of Archaeological Exclusion Zones (AEZs) is in recognition of different seabed development activities and their associated risk to either known or unknown elements of the historic environment as might be present. The primary function in the use of AEZs is as a mitigation measure to provide in-situ protection and therefore the spatial scale of an AEZ will vary on a case-by-case basis. It is therefore important that the archaeological Written Scheme of Investigation (WSI) produced from the outline WSI included within the DCO application explains how AEZs are identified, mapped, monitored and included within other relevant project delivery documentation used by the Consent Holder, contractors and sub-contractors (e.g. *Offshore In Principle Monitoring Plan*, DCO Document: 8.12, version 1, dated June 2019). In reference to the two designated historic shipwreck sites that exist within the proposed development Order Limits:

- The *Seagull* (Feature ID: 70809¹); and
- *Xanthe* (Feature ID: 70834)

It is important to offer the correction to the Applicant's response that these are now scheduled monuments and afforded statutory protection through the provisions of the Ancient Monuments and Archaeological Areas Act 1979. We also confirm that the List Entry for these two designated sites is available, as per the web links provided in our letter, dated 10th December 2019 (response to First Written Questions) submitted for Deadline 2. The List Entry also spatially defines the scheduled area, for both these designated heritage assets, as 100m in radius and therefore the minimum spatial extent of any AEZ must be amended to accordingly within any offshore archaeological WSI produced post-consent, should permission be obtained.

¹ The numeric code used within the Environmental Statement (Volume 1), Chapter 17 "Offshore and Intertidal Archaeology and Cultural Heritage"



Q1.0.9 – Accumulated Archaeological Data as proposed mitigation

Question directed to the Applicant

Response: We note that the question directed to the Applicant directs particular attention to how a WSI produced for this proposed project would secure cumulative data gathered from multiple projects. We confirm that it is an important component of any agreed WSI that it contains a timeframe (as informed by any DCO) regarding the completion of all necessary programmes of archaeological investigation and the deposit of data and information with local and national archives. However, the detail of the WSI will only specify matters as relevant to this development and therefore will not specifically address multiple (i.e. other seabed development) projects. In our Written Representation (dated 10th December 2019) we highlighted in paragraph 5.16 the commitment made by the Applicant to make data available for a wider strategic study of palaeo-environmental evidence. The crucial matter to enable such a strategic study to occur is predicated on the Applicant ensuring that all matters associated with completion of archiving responsibilities for this project are completed.

1.1 – Onshore archaeology

Q1.1.2 – WSI Construction Stage Plan(s), Contractor Environmental Action Plan(s)

Question directed to the Applicant

Response: We note the detail of the response to this question produced by the Applicant and the attention given to consultation with Historic England during pre-application. We do not identify any other matters that require our attention in this response and we have no other comment to offer.

Q1.2.1 – Construction stage effects on listed buildings

Question directed to the Applicant

Response: The Applicant has explained the engagement conducted with Broadland District Council on the Cawston Conservation Area as part of the proposed Norfolk Vanguard offshore wind farm Nationally Significant Infrastructure Project (NSIP) examination. Therefore in consideration of highlighted role of the relevant Local Authority regarding this matter we have no other comment to offer.

Q1.2.6 – Clarification of non-designated heritage asset

Question directed to the Applicant

Response: We acknowledge the attention given in the response provided by the Applicant to the mitigation measures contained within the Outline WSI (Onshore) and the consultation to occur with the relevant Local Authorities and Historic England to deliver Requirement 23 of the draft Development Consent Order. We therefore have no other comment to offer.

Yours sincerely,



Dr Christopher Pater
Head of Marine Planning



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