

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

30th January 2020

Dear Ms Fernandes,

**Application by Norfolk Boreas Limited for the Norfolk Boreas Offshore
Windfarm
Response to Deadline 4
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, any published Marine Plan(s) and National Policy Statements.

We offer the following response to the matters examined at the Issue Specific Hearing held in Norwich on 22nd January 2020 and the Action Points arising as relevant to the role and responsibilities of Historic Buildings and Monuments Commission for England (HBMCE). We also acknowledge that the following Action Points are specifically directed to the Applicant, but we hope that the response we offer here will be of help in your examination of this proposed project.



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Action 1 – *Submit clarification note on procedures and sequencing for post-consent surveys of the landfall site below MLW with regard to managing risks and opportunities for archaeological assets on and below seabed and implications (if any) of selection of horizontal drill method.*

Party – The Applicant

Response offered by HBMCE: In reference to the evidence we gave at the Issue Specific Hearing on 22nd January and within our Written Representation (paragraph 5.8) we draw your attention to the importance of pre-commencement (high resolution) surveys to ascertain the risks to any known or unknown archaeological or historic features, for example, as could be located at the electricity export cable landfall location. Therefore in reference to our present understanding about the proposed methodology to conduct Horizontal Directional Drilling, as described within the DCO application, and our knowledge of palaeo-environmental characteristics in the vicinity of the proposed landfall location, we have no further comment to offer. However, we are available to provide further advice, as necessary, regarding any clarification note that the Applicant produces to address this Action Point.

Action 3 – *Respond to Historic England [REP3 015] to clarify the process and timeline of consultation, submission and agreement of the post-consent offshore Archaeological WSI in order to achieve timely delivery of mitigation.*

Party – The Applicant

Response offered by HBMCE: We have corresponded with the Applicant and we offer the Examination Authority the provisional advice, that subject to submission by the Applicant and our review of a revised *Outline Written Scheme of Investigation: Archaeological and Cultural Heritage (Offshore)* (DCO Document Ref: 8.6), the measures to conduct consultation and preparation of any post-consent, pre-commencement Archaeological WSI should be adequately addressed through the conditions of the deemed Marine Licences (Schedules 9 to 13) within the draft Development Consent Order. However, we must defer to the Marine Management Organisation, as the competent authority, the formal agreement of documentation submitted in accordance with any deemed Marine Licences conditions secured for this proposed project.

Action 9 – *Submit plan showing the relationship between seabed features of archaeological interest and Annex 1 reef features and note on optimising cable routing through the HHW SAC to manage risks of potential additional archaeological constraints affecting the conservation objectives of the SAC.*

Party – The Applicant

Response offered by HBMCE: We confirm that, subject to the Applicant producing a plan as requested, we can offer further advice, as necessary, regarding mitigation measures. In particular, the spatial design and implementation of Archaeological Exclusion Zones for known or possible archaeological features or anomalies as might be encountered by this proposed development.

Yours sincerely,



Dr Christopher Pater
Head of Marine Planning



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