

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

24th February 2020

Dear Ms Fernandes,

**Application by Norfolk Boreas Limited for Norfolk Boreas Offshore Windfarm
The Examining Authority's Second Written Questions and requests for
information (ExQ2) Issued on 12 February 2020
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 plans and National Policy Statements.

Further to receipt of the second set of written questions (dated 12th February 2020) we hereby offer the following response to those questions directed to Historic England.

Q1 Archaeological and heritage assets

Q2.1.02 Clarification note on Archaeological Interests and Survey at the landfall site:

Comment by Deadline 5 on the clarification note [REP4-021] provided by the Applicant at Deadline 4 with particular reference to archaeological investigation to inform selection of the subtidal zone drill exit locations.

Response: We have reviewed the clarification note (as referenced above) and it is our advice that sufficient detail is provided about the archaeological investigations to be conducted at the proposed sub-tidal Horizontal Directional Drilling (HDD) exit



location. We also acknowledge the attention given in section 4 (post-consent surveys) to a survey specific Archaeological Written Scheme of Investigation (WSI) to be produced in accordance with the Outline WSIs, both onshore and offshore. In reference to the possible sub-tidal HDD exit location for the electricity export cable(s), it is important to consider the archaeological interpretation of geophysical and geotechnical survey data acquired to date and whether or not any anomalies or features of possible archaeological interest are identifiable approximately 1km offshore. It is apparent from the clarification note that seabed anomalies could be located within the possible impact zone associated with HDD. It will therefore be the responsibility of the Applicant to determine whether or not any anomalies encountered are of archaeological interest or in any other way hazardous to the required drilling operation. We therefore acknowledge the attention given in paragraph 17 to micro-siting operations or, if unavoidable, to instigate further investigation strategies in accordance with any agreed WSI.

Q2.1.03 *Archaeological analysis programmes: Is the completion of archaeological analysis programmes and provision of public access to data now adequately secured as mitigation by the outline offshore Written Scheme of Investigation (WSI)?*

Response: We acknowledge that the Applicant has produced a revised Outline archaeological WSI (Offshore) (Ref: Version 2, dated February 2020; PINs document Ref 8.6). We confirm that the Outline offshore WSI contains sufficient direction so that completion of analysis programmes (to established professional standards) should take place and for data and information generated to be placed within public archives, in reference to the conditions stipulated within the draft DCO.

Q2.1.04 *Clarification note on relationship of archaeology and reef features: Comment by Deadline 5 on the clarification note [REP4-022] provided by the Applicant at Deadline 4 'Optimising Cable Routing through the HHW SAC'.*

Response: We have reviewed the above referenced document and we note the confidence expressed by the Applicant in section 3.1 (Micrositing in constrained areas) that there should be sufficient space to accommodate the seabed clearance and placement of the electricity export cables associated with the proposed Norfolk Vanguard and Norfolk Boreas projects. We noted the statement made in paragraph 19 regarding "pre-construction geophysical and drop down video surveys as outlined in the In Principle Monitoring Plan". We hereby acknowledge that the Applicant has produced a revised 'In Principle Monitoring Plan' (Ref: Version 3, dated February 2020; PINs document Ref 8.12), but we consider it important that reference should be to the revised Outline WSI (Offshore), as referenced above, and the commitment to produce a post-consent survey specific WSI. In particular, for the adoption of survey strategies as necessary to determine whether or not presently identified anomalies are of archaeological interest, but also to reveal the presence of presently unknown anomalies of possible interest, especially in locations of dynamic seabed conditions. In this regard, section 4.1 (Archaeology and the WSI) should have emphasised production of a post-consent surveys specific WSI.

Yours sincerely,



Dr Christopher Pater
Head of Marine Planning



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