



Historic England

Response to Examiner's Questions 2

On behalf of the

HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND

(HISTORIC ENGLAND or HE)

Application by

**Net Zero Teesside Power Limited
and Net Zero North Sea Storage Limited**

for an Order granting Development Consent for a

full chain carbon capture, usage and storage project, including a gas-fired electricity generating station with post-combustion carbon capture plant; gas, electricity and water connections (for the generating station); a co2 gathering network; a co2 compressor station; onshore co2 export pipeline; and other associated development

PINS Reference No: EN010103

HE Reference No: PL00704331

HISTORIC ENVIRONMENT	
Question HE 2.1	<p>The Applicants’ responses to ExQ1 HE.1.5 and HE.1.6 [REP4-028] provide assessments of significance of the blast furnace and associated steel works infrastructure, and the setting of the conservation areas at Coatham, Kirkleatham, Yearby, Wilton and Seaton Carew.</p> <p>Can RCBC, HBC and Historic England confirm their satisfaction with these assessments of significance and effects, or do they require any further information or clarification?</p>
Historic England response	<p>Historic England is satisfied with the assessments of significance for these heritage assets. We do not require any further information or clarification.</p>
Question HE 2.2	<p>In Historic England’s response to ExQ1 HE.1.5 it is noted that ‘a request for listing the Blast Furnace has been received from a member of the public and it is currently being looked at’. Please provide an update</p>
Historic England response	<p>The Blast Furnace has been assessed for listing twice in the past six years – once in February 2016 and again in July 2022. Both times it was turned down as it did not meet the criteria for listing. The reasons being:</p> <ul style="list-style-type: none"> - A low degree of Historic interest: <ul style="list-style-type: none"> o the blast furnace is late in date, having been constructed in the 1970s. - A low degree of Architectural interest: <ul style="list-style-type: none"> o although an important physical marker for the highly significant Teesside steel and iron industry, it was a much later addition to the Dorman Long site and its interest has been diminished by the loss of the site’s other buildings; o it is undistinguished architecturally and is utilitarian in character and appearance; o it does not display any technological innovation in terms of its design or construction; and o although the biggest in Europe when built, the blast furnace is considered to have been the product of technological evolution rather than of highly significant innovation. <p>The full reports for both listing assessments are publicly available on the <i>Heritage Gateway</i> website:</p> <ul style="list-style-type: none"> - 2016 decision: [REDACTED] - 2022 decision: [REDACTED]

Question HE 2.3	<p>The Applicants' response to ExQ1 HE.1.1 [REP4-028] provides details on the scope of archaeological investigation, and states that construction activity would not impact buried archaeological remains and that therefore mitigation set out in a Written Scheme of Investigation (WSI) is not required. The response also includes the WSI for marine archaeology. The updated Framework CEMP [REP5-014] includes procedures for reporting, protection and management of unexpected archaeological discoveries.</p> <ul style="list-style-type: none"> i) Could the RPAs (in consultation with the relevant archaeology service for your area as necessary) and Historic England confirm their satisfaction with this approach, or if they require any further information or clarification? ii) Could the MMO and Historic England confirm satisfaction with the WSI for marine archaeology, or if they require any further information or clarification?
Historic England response	<p>(i) Historic England advise that it is for the Local Planning Authority's Archaeological Advisors to confirm if archaeological works are not required (as stated in [REP4-028]) within the proposed development area as that is wholly within their remit.</p> <p>Draft Development Consent Order – Schedule 11, Condition 15</p> <p>We appreciate that Local Planning authority jurisdiction extends to Mean Low Water (MLW) and that this proposed project requires curatorial responsibility for the area of proposed works that extend seaward of MLW. We therefore appreciate that referral for curatorial advice is to Historic England as necessary to produce an “appropriate and proportionate mitigation strategy” as mentioned in Paragraph 19.7.3 in Environmental Statement Chapter 19 (Marine Heritage).</p> <p>We are aware that the draft DCO submitted at Deadline 6 (2nd August 2022) included an amendment in 15(c) that: “details of the measures to be taken to protect record or preserve any significant archaeological features that may be found and must set out a process for how unexpected finds will be dealt <u>with which must be in accordance with the measures in the framework construction environmental management plan;</u>”</p> <p>Therefore, in reference to Net Zero Teesside – Environmental Statement Volume III – Appendices Appendix 5A: <i>Framework Construction Environmental Management Plan (CEMP) including SWMP</i>, we understand that a CEMP is to set out a series of proposed measures that are to be applied by contractor(s) to deliver planning, management and control during construction, so that potential impacts to people, businesses and the natural and historic environment are prevented.</p> <p>Regarding CEMP Table 5A-12: Cultural Heritage (including Archaeology), we note the attention given to approval by the relevant planning authority in consultation with relevant archaeological body.</p>

We therefore offer the advice that for all works landward of MLW referral will be to the relevant local planning authority as advised by their archaeological curatorial body. For all works within the proposed Order Limits seaward of MLW, the planning and marine licensing authority is the MMO, as advised by Historic England

- (ii) In the document NZT Power Ltd & NZNS Storage Ltd *Further Information Regarding Applicants' Responses to Historic Environment FWQs* (Document Reference: 9.1; PINs Ref: REP4-028), Appendix B – Written Scheme of Investigation for Marine Archaeology is an outline scope of works required to mitigate potential impacts should consent be obtained.

An outline Written Scheme of Investigation (WSI) is submitted because the Applicants maintain that the final design of the Proposed Development is not yet known. However, post-consent, a specific WSI is to be prepared by a “qualified and competent Archaeological Contractor” and submitted to and approved by the MMO. This reflects that the draft Development Consent Order (including deemed Marine Licence) stipulates in Schedule 11, Condition 15 that “...activities must not commence unless a written scheme of archaeological investigation has been submitted to and approved in writing by the MMO”

The Outline WSI

It is understood that marine archaeological investigation will focus on the site of the launch/receiver point for the construction of a replacement water outfall, which is located 1km offshore. The outfall exit is to be located at the end of the Horizontal Directional Drilling (HDD) tunnel with a pocket dredged for the outfall head, with rock armour placed around.

There are no known wrecks, including protected wrecks, obstructions or aircraft remains recorded within the Order Limits in the vicinity of the HDD outfall. However, geophysical survey for this proposed project extended only partially into the Order Limits and the majority of the Site within the Order Limits has not been subject to archaeological investigation.

It appears that the only geophysical data that was used for this project was sourced from survey done in advance of the Teesside Offshore Wind Farm (construction completed in June 2013). It therefore seems appropriate that survey data acquisition is proposed to inform the design and delivery of this proposed development, should consent be obtained.

The WSI acknowledges the presence of a palaeo-channel within the Order Limits, which is described as being of “medium value”. The outline WSI states that a programme of marine geophysical survey and geoarchaeological assessment is proposed, including:

- side-scan sonar;
- magnetometer;
- sub-bottom profiler; and
- multibeam echo sounder.

We concur with the geophysical survey techniques proposed and that detailed method statements will be required as an output of any post-consent WSI subsequently produced.

Section B.2. Scope of work

Regarding geotechnical survey, the outline WSI states that "...geoarchaeological samples will be obtained during marine geotechnical surveys carried out in advance of the installation of the outfall". We concur with the statement that geoarchaeological samples are to be made available for geoarchaeological recording and sub-sampling in accordance with a post-consent WSI. Crucially, the supply of undisturbed vibro-core and/or borehole material must be prior to any processes that may render the sample ineffective or otherwise corrupted, such as other testing procedures or poor storage.

Section B.3. Methodology

The text states that "All survey work will be carried out in accordance with this outline WSI and current good practice and guidance." However, we are aware that the final design of the proposed development is not yet known. Therefore, this outline WSI can only set out the general scope of investigative works that are likely to occur. Consequently, it is more appropriate to state that the outline WSI will only inform a post-consent WSI subsequently produced. It should also be noted that reference to *Model Clauses for Archaeological Written Schemes of Investigation: Offshore Renewables Projects* should reference the edition published by The Crown Estate in July 2021 and not the previous edition listed in Section B.7. References.

Regarding "Monitoring and progress reports" we consider the following to be too vague "...verbal progress reports upon request, and/or weekly written progress reports". Any WSI produced post-consent must set out timeframes (vis. as alluded to in B.4. Deliverables and B.5. General project requirements) for reporting to be formally agreed and thereby enable monitoring and enforcement through (draft) DCO Schedule 11, Condition 15.

This concludes Historic England's response to Examiner's Questions 2.