



EAST OF ENGLAND OFFICE

SA/DEP Casework Team

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By Email Only

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14 February 2022

Dear SA/DEP Team

Re: ExQ 1

Application by Equinor New Energy Limited for an Order Granting Development Consent for the Sheringham Shoal Offshore Wind Farm Extension Project and Dudgeon Offshore Wind Farm Extension Project. Issued on Friday 27th January 2023

Please find below Historic England response to the ExA 1st written questions at Deadline 1

Question Reference	Question	Historic England (HBMCE) response
Offshore matters Q1.15.1.2	<p>AEZs within the Offshore Temporary Works Area</p> <p>Do you consider any modifications are required to the AEZ limits set out in the ES [APP-100, Table 14-27], or that additional AEZs are required around other identified assets?</p>	<p>We are aware that following the Preliminary Environmental Information Report (PEIR) consultation an amendment was made to the proposed Order Limits to include an Offshore Temporary Works Area (i.e. a spatially defined adjacent areas of seabed that may be required for “temporary works” e.g. anchoring or deployment of jack-up vessels.</p> <p>We are aware that there are numerous features of archaeological or historic interest identified through desk-based assessment in the Offshore</p>





		<p>Temporary Works area, as plotted in Figure 14.5 in ES Chapter 14 Figures – Offshore Archaeology and Cultural Heritage (PINs Ref: APP-126). Regarding the delivery of mitigation, we note the recommendation that AEZs of 100m are implemented around the 16 UKHO records within the Offshore Temporary Works Area, as measured around the recorded point locations to try and include the full extent of wreckage and associated debris.</p> <p>For the purposes of the ES, however, a review of existing desk-based data, and previous archaeological assessments undertaken for DOW and shows that there are 21 additional wrecks and obstructions (Table 14-20) listed by the UKHO within the Offshore Temporary Works Area. It is also apparent from Table 14-20 that numerous records are described as “dead wreck” such that no wreck has been found in subsequent (UKHO) surveys with the location considered to represent a reported loss only. Therefore, use of a measured point location for these records is accepted.</p> <p>It should be noted that subsequent higher resolution geophysical survey (and any visual inspection)</p>
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		<p>my reveal if a “dead wreck” is now identifiable or for a charted wreck if a wider debris field now exists which requires the AEZ to be spatially delineated differently i.e. as a polygon. We are also aware that there are two further AEZs within the Offshore Temporary Works Area which correspond to the aircraft remains identified during the ROV investigation for DOW (Table 14-21, ES Chapter 14 and also paragraph 237). Regarding Table 14-27, we agree with the general principle that if a wreck (vessel or aircraft) is identified as being highly dispersed, a precautionary 100m AEZ should be implemented. For any wreck which appears to be more intact, an AEZs of 50m around the definable wreck complex is acceptable. However, for highly fragmentary remains, we note that the AEZ identified for aircraft engines/propeller (ID 70819, 70832 & 70842) is a 30m AEZ buffer. It is important to note that the AEZ buffers incorporated into the updated Order Limits, are exclusively based on desk-based assessment, which includes information generated by the same maritime archaeological consultant employed for the assessment for Dudgeon Offshore Wind Farm, as reported between 2009 and 2014. It is therefore</p>
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		<p>possible that dynamic seabed conditions could now expose previously buried and unknown archaeological features or other sites of historic interest.</p> <p>Furthermore, we accept that a 50m AEZ buffer could be reduced (or increased) within the Offshore Temporary Works Area subject to completion of additional assessment conducted by a professional, accredited and experienced maritime archaeological consultant/contractor.</p> <p>Regarding the use of AEZs around other identified (heritage) assets, we refer you to our Written Representation (paragraphs 5.12, 5.15 and 5.24-5.25). In particular, we are aware that for anomalies classed as “A2” (“uncertain origin of possible archaeological interest”) AEZs are not recommended at this time, which does mean that all parties carry risk that presently identified “A2” anomalies could be of considerable archaeological interest, which depending on location (i.e. within the English Inshore Marine Planning Area) could merit determination for designation. However, we appreciate the considerable number of “A2” presently identified (518) and that some may be contemporary debris of no historic</p>
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		<p>environment interest. We therefore accept the strategy adopted by this project to include an Outline Marine Written Scheme of Investigation (PINs Reference: APP-298), which is to be delivered as a Consent condition within the Deemed Marine Licences (PINs Reference: APP-024) as an effective means to ensure all survey work conducted post-consent and crucially, pre-construction is informed by archaeological objectives to qualify and quantify the presence of features, anomalies or other sites of archaeological/historic interest. Such professional assessment is to support the use of a classification system, as described above, and application of appropriate mitigation measures such as <i>in situ</i> avoidance through use of AEZs or structured investigation, excavation, recovery, post excavation conservation, permanent curation and archiving if unavoidable.</p>
<p>Onshore matters Q1.15.2.1</p>	<p>Outline Written Scheme of Investigation Are you satisfied that the OWSI, and its accompaniments, provides sufficient protection for unknown heritage/ archaeological assets with appropriate mitigation in place to preserve such assets?</p>	<p>As set out in our Written Representation we have some concerns that the post-consent investigations proposed in the Outline WSI may not fully identify unknown archaeological heritage assets prior to the construction phase and we recommend that post-consent survey work should be more comprehensive in its</p>





		coverage. (please see our Written Rep Chapter 15. for more details)
Q1.15.2.2	<p>Swannington</p> <p>The village of Swannington contains numerous heritage assets including:</p> <ul style="list-style-type: none"> • St Margaret's Church (Grade I) • Swannington Hall (Grade II*) • Swannington Hall Barn (Grade II) • The Old Rectory (Grade II) <p>(list non-exhaustive)</p> <p>Sheet 21/40 of the Works Plans shows a construction access being taken from the end of Church Lane down to Swannington 'From Farm to Fork.' The ExA interpret this that HGVs would drive into Swannington via link 138/139, east along Church Lane, past each of the aforementioned heritage assets, in order to reach the construction access (the ExA note that Church Lane itself is not identified as a link in the Traffic and Transport Figures).</p> <p>a) If this is not the case (i.e. the wrong interpretation), explain why there is a construction access shown, what its purpose is and how construction vehicles would access it; or</p> <p>b) If the ExA's assumption is correct, provide justification for there being no assessment of the impacts upon these heritage assets within either ES Chapters 21 or 23 [APP-107], [APP-109].</p>	<p>Whilst we acknowledge that the impacts on the designated heritage assets arising from the construction access would be temporary, we consider that it is for the applicant to clarify these matters at this stage.</p>
Effects on Designated and	<p>North Norfolk Heritage Coast</p> <p>Explain your respective positions on the qualities and significance of the Heritage Coast, particularly the stretch within</p>	<p>We note that you have directed this question to Historic England, among others, but it is important for us to explain that Heritage</p>





<p>Historic Landscapes Q1.18.3.6</p>	<p>which the Proposed Development would be theoretically and actually visible. Set out where you consider harms would occur and what, if anything, could be done to minimise the harm or improve the visitor experience.</p>	<p>Coasts are “defined” (not designated) through agreement between local planning authorities and Natural England. Broadly speaking Heritage Coasts are out with the remit of Historic England. We appreciate however that it is the purpose of Heritage Coasts to conserve, protect and enhance features inclusive of those of heritage interest, and defer to the local authority historic environment advice service to offer further comment as to what this proposed development might have on the North Norfolk Heritage Coast.</p>
<p>Q1.18.3.7</p>	<p>Aviation Lighting Would you wish to see revisions to the quantum aviation lighting across both the Proposed Development together with the existing extent of the SOW and DOW, to minimise it where possible, so as to minimise night-time effects on the historic seascape?</p>	<p>In our Written Representation (Chapter 5) we offer comment regarding perceptions of Historic Seascape Characterisation (HSC) and how it has been considered within the ES. We also have considered Figure 14.2 Historic Seascape Character – Proposed Developments (PINS Ref: App-126) and we do not offer any specific revisions as relevant to aviation lighting either in reference to SEP and DEP or the existing SOW and DOW developments. We also accept that there may be very specific lighting requirements that must be prioritised and cannot be compromised. It is relevant to consider that HSC is an exercise in combining disparate spatial data to try and generate a perception of</p>





		<p>historic character and how that character can accommodate proposed changes – without attributing any concept of ‘sensitivity’. It would seem apparent that these developments have and will introduce change i.e. the operational life of SEP and DEP is estimated to be 40 years (Chapter 4, Table 4-4. PINS Ref: APP-090). It is therefore our advice that in consideration of the historic character (including other industrial maritime activities) and how change is recorded, we cannot specifically identify a minimal night-time effect which could be applied.</p>
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If there are any further material changes to the proposals, or you would like further clarification in relation to our advice, please contact us.

Yours sincerely

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Inspector of Ancient Monuments

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