



## PINs Registration and Relevant Representation Form

### Section 56 Planning Act 2008

Response deadline: 21st June 2023

Our ref: PL00667042

Project: Five Estuaries Offshore Wind Farm

PINs Ref: EN010115

Registration ID 20049310

#### Response by:

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### About Historic England

The Historic Buildings and Monuments Commission for England (HBMCE) is better known as Historic England, and we are the Government's adviser on all aspects of the historic environment in England, including historic buildings and areas, archaeology and historic landscapes.

We have a duty under statute to promote conservation, public understanding and enjoyment of the historic environment. We are an executive Non-Departmental public body and we answer to Parliament through the Secretary of State for Culture, Media and Sport (DCMS).

In addition to our remit for the conservation of the historic environment the National Heritage Act (2002) has given HBMCE responsibility for maritime archaeology and cultural heritage in the English area of the UK Territorial Sea.

### The Proposal

The scheme is for an extension to the existing Galloper Offshore Wind Farm. The new wind farm if granted would be across two separate seabed areas with a combined area of 128 km<sup>2</sup>. The project would be up to 79 turbines with a maximum tip height of c. 399 m, with associated cabling and infrastructure. The turbines would be located approximately 37 km at its closest point off the coast of south Suffolk and would be coming ashore at Sandy Point between Frinton-on-Sea and Holland-on-Sea in Tendring, Essex. The project includes a 22 km cable run to a new substation located to at Little Bromley in Essex, which will in turn connect to National Grid's proposed Norwich to Tilbury Project hub.

### Representation

We summarise our representation regarding this proposed project as follows.



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Please note that Historic England operates an access to information policy.

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





## 1. Introduction

The applicant has provided a detailed Environmental Statement, which includes the Historic Environment. This is broadly separated into Marine and terrestrial matters and spread over specific chapters and appendices. We can confirm Historic England has been party to pre-application engagement and the documents reflect these discussions and are sufficiently detailed for the purposes of this examination. We will be submitting a full, detailed written representation in due course.

Following our analysis of the ES, our follow up statement will include specific comment with regards to the main chapters. As with our remit we will not be making any comment on the Grade II listed buildings and will defer to the local authority in those matters.

We have however set out below our chief areas of concern with regards to what is outlined in the ES ahead of the full written representation.

## 2. On-shore Historic Environment Assessment

The proposal lies in a sensitive area for the historic environment and the ES confirms the proposal will impact upon a wide range of receptors both designated and undesignated. The baseline and assessment is clearly set out in the DBA and accompanying ES chapters. It was agreed during the scoping process that detailed assessment of the impact of the proposal upon the historic environment would be required, and that the effects of the scheme could potentially be significant. The ES confirms this.

Some evaluation work has been undertaken, for example geophysical survey to determine the significance and therefore the degree of harm to those assets. We have however raised concerns during the pre-application process (See comments in Table 7.2) about the level of detail that can be provided by these methodologies alone, and we believe this is insufficient.

In order to provide an effective mitigation strategy for heritage, assets particularly non-designated archaeological sites within the construction corridor, need to be fully assessed so that the significance and value to be determined and assigned. This is best done via a range of techniques, however in our view this should also include intrusive evaluation. At present the values set out in Section 7.10 and assigned to individual heritage assets is in our view based on only a partial assessment. These values are therefore only interim or draft.





We acknowledge the applicant has set out mitigation and we accept there are factors that can limit opportunities for evaluation, however further intrusive assessment provides clarity on significance and reduces project risk. Particularly when targeted at key construction areas such as cable landing and direct drilling sites. This is the approach we and Local Planning Authority partners have recommended.

It is also important to identify any sites which are of equivalent value to a designated heritage asset as soon as possible, and prior to construction work commencing to ensure mitigation measures are effective and can be implemented. One such site - the Little Bromley henge, (See Section 7.10) has already been identified by this scheme.

In addition, geoarchaeological and geotechnical information provided appears to have been based on a very low number of interventions. This is challenging, considering the number and size of the river channels identified. We consider this needs to be revisited by the applicant and more information provided as a matter of some urgency (see Figure 6.12). Again, these are often strategically important construction locations such as drill sites.

We note an Outline Written Scheme of Investigation (WSI) has been prepared in consultation with the statutory consultees which sets out details of post-consent assessment and mitigation measures (Volume 9, Report 23: Outline WSI), and we will also provide further comments on this document in our Written Rep

### 3. Offshore (Marine) Historic Environment Assessment

The proposed development area includes 105 wrecks and obstructions based on information held by UK Hydrographic Office and Historic England's National Record for the Historic Environment. Furthermore, 235 high potential anomalies and 98 medium potential anomalies have been assigned Archaeological Exclusion Zones.

The Applicant has explained that marine survey programmes including all geotechnical works are proposed post-consent and prior to construction (should consent be secured). We can confirm that all survey campaigns would therefore need to be designed and planned to include the collection of archaeologically specific cores, in order to meet archaeological objectives.

This will need to be set out in an agreed Written Scheme of Investigation (WSI) building on the Outline Written Scheme of Investigation (WSI) (PINs Ref: APP-251) submitted by the Applicant.





It is apparent from the Offshore Archaeology and Cultural Heritage chapter (PINs Ref: APP-080) in the Environmental Statement (ES) that the impact assessment presented relies on embedded mitigation to avoid significant impact. Although they have acknowledged that marine survey works and archaeological analysis and interpretation will be required post-consent, should permission be secured.

The Applicant has therefore interpreted mitigation requirements set out in National Policy Statements for Energy (published November 2023) that reflects the broad characterisation of the proposed development area presented in the ES. Assumptions made about effectiveness of avoidance to remove significant impact effects are predicated on adequacy of all subsequent survey investigations (e.g. geophysical and geotechnical) to allow for adaptive mitigation through design changes, as and when this project encounters presently unknown heritage assets.

It is therefore important that the Applicant has acknowledged the risk that this project will encounter both the known and presently unknown elements of the historic environment. The production of an Outline archaeological WSI is therefore important.

We also confirm that the production of a scheme specific WSI is required as conditions within the deemed Marine Licences (Schedules 10 and 11) of the draft Development Consent Order (PINs Ref: APP-024). We will provide further comment through our Written Representation as there are matters which require your attention. This is needed ensure that this project is most appropriately aligned with expectations set out in the national planning policies.

We are very concerned that limited detail has been provided about the spatial proximity of this proposed development (Electricity Export Cable) to HMS E6 (subject to statutory protection under the Protection of Military Remains Act 1986). Given the statement made by the Applicant that the study area has been updated since the Preliminary Environmental Information Report consultation was produced. We confirm however that the Ministry of Defence would be the competent authority for designation and administration responsibilities under the 1986 Act.

#### 4. Development Consent Order

In the event of the project being consented, we would also want to ensure that there is adequate mitigation and we will be providing comments on the DCO wording, and the REAC and OWSI documents.





The Draft Development Consent Order (Ref: Section 3.1, March 2024: Doc Ref: APP-024)  
Onshore Archaeology Requirement 11 (1) states

'No stage of the onshore works may commence until for that stage an archaeological written scheme of investigation in accordance with the outline onshore written schemes of investigation as appropriate for the relevant stage has been submitted to and approved by the relevant planning authority.'

We recommend wording is added to provide names parties which would need to include Historic England, and the County archaeological service (Essex Place Services) as advisors to the LPA.

19.6.2024

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