



Historic England

Five Estuaries Casework Team
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BY EMAIL ONLY

Our ref:
Your ref: EN010115
ExQ_3

Telephone [REDACTED]

03rd March 2025

Dear Five Estuaries Casework Team

Re: ExQ- 3: Historic England Response

Please find below Historic England's response to Examination Authorities 3rd Questions (Issued 3rd February 2025 – Deadline for response 3rd March 2025).

Yours Sincerely

Dr Will Fletcher

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<p>Question HE.3.01 (Historic England)</p>	<p>Impacts on Sediments and Geoarchaeological Potential</p> <p><i>Item HE04 in the 'draft/unsigned' Statement of Common (SoCG) between yourself and the Applicant [REP5-058] indicates that you consider there is potential for significant impacts on preserved paleochannels and deposits with high geoarchaeological potential?</i></p> <p><i>During Issue Specific Hearing 6 (ISH6) the Applicant advised that the surveys done to date are engineering investigations and not pre-construction surveys.</i></p> <p><i>With this in mind, what further investigations and evaluation do you consider necessary and proportionate at this stage?</i></p>	<p>HE Response 03/03/2025</p> <p>The Environmental Statement (ES) prepared for this proposed project (dated March 2024) Volume 6, Chapter 11: Offshore Archaeology and Cultural Heritage (PINs Examination Ref: APP-080) states that no offshore geotechnical surveys have been undertaken for the project (see paragraph 11.6.8).</p> <p>We recommend therefore that any such survey should be commissioned post consent (subject to authorisation).</p> <p>We have listened to the response offered by the Applicant at ISH6 (held 22nd January 2025) and that reference is made to the commissioning of geotechnical survey to assist engineering investigations. We acknowledge that that the Applicant contacted us on 3rd September 2024 regarding a geotechnical campaign to be conducted between September and November 2024. We also acknowledge that the Applicant supplied us with an archaeological method statement (Geotechnical Campaign 2024, Document Reference N/A; Revision 1.0; Date 3rd September 2024), to which we responded on 5th September 2024.</p> <p>It was explained by the Applicant that a maximum of twelve boreholes to a depth of approximately 80m below the seafloor were to be obtained from within the proposed Array Area.</p> <p>We appreciate that the Applicant has stated that the primary purpose of this survey was to assist engineering design. In response to your question about what further investigation and evaluation we await further correspondence from the Applicant to explain if material produced by the 2024 geotechnical survey has been assessed, as described within the above</p>
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		<p>referenced method statement, and how this analysis could benefit the planning and design of any subsequent survey campaigns.</p> <p>We consider there to be sufficient information presented at this stage i.e. within the DCO application, to demonstrate the importance of archaeological advice informing any post-consent and pre-commencement survey campaigns. If geotechnical surveys are to occur post consent, then, in accordance with the (draft) deemed Marine Licences, geoarchaeological assessments should be conducted in reference to the Outline Marine Written Scheme of Investigation (Volume 9, Report 19: Outline Marine Written Schemes of Investigation. PINs Examination Ref: APP-251).</p>
<p>Question HE.3.02 (Historic England)</p>	<p>Geoarchaeological Cores</p> <p><i>Item HE05 in the 'draft/unsigned' SoCG [REP5-058] indicates that you consider nine geoarchaeological cores are insufficient in relation to the size and complexity of the project. Similarly, as above the Applicant, in ISH6, indicated that these were engineering surveys rather than wider archaeological surveys.</i></p> <p><i>What further information/investigation do</i></p>	<p>Response</p> <p>The most important stage for any further geoarchaeological analysis and assessment to occur is post-consent (should permission be obtained) and pre-commencement to inform project design and delivery.</p> <p>The important detail regarding potential impact to the historic environment and any subsequent survey programmes relates to the depth of seabed penetration, for example, for monopiles this could be 68 m (diameter up to 15 m), for suction caisson foundations 25 m penetration and 40 m diameter and for Gravity Base System (GBS) foundations, with base diameter of up to 55 m (as described within ES Volume 6, Chapter 1: Offshore Project Description. PINs Examination Ref: APP-069).</p> <p>From our perspective it is the depth and area of seabed excavation that indicates the greatest possible direct impact to archaeological materials on, within and beneath the contemporary seabed; either within the array areas or ECC.</p> <p>It is our advice that geoarchaeological analysis of marine geotechnical survey material is necessary and we appreciate the previous identification of potential geotechnical sampling</p>



	<p><i>you consider is required and at what stage?</i></p>	<p>locations, as illustrated in Drawing Number 11.1.12 within Volume 6, Part 5, Annex 11.1: Offshore Archaeology and Cultural Heritage Technical Report (PINs Examination Ref: APP-128).</p> <p>We consider the required action is for further liaison with Historic England in the planning of any future marine geotechnical survey programme, that would be used to inform any subsequent phases of project delivery. This is as alluded to in paragraph 4.11.5 within ES Volume 9, Report 32 Offshore In-Principal Monitoring Plan (PINs Examination Ref: APP-265).</p> <p>We accept that any geoarchaeological analysis should follow any Development Consent Order (DCO) decision in accordance with the provisions within the (draft) deemed Marine Licences contained within the DCO. The optimum stage for such work to occur and therefore provide greatest efficiency, is for archaeological advice to inform the planning of any geotechnical survey work as might occur post-consent (should permission be obtained) and pre-commencement.</p> <p>We also add the importance of corroboration between geophysical and geotechnical surveys and the use of data derived from those surveys to determine presence of archaeological features that require investigation, as necessary to inform project delivery planning, such as described within paragraph 6.8.7 of the Outline Marine Written Schemes of Investigation (as referenced above).</p>
<p>Question HE.3.03 (Applicant and Historic England)</p>	<p>Draft Development Consent Order</p> <p><i>Items HE02 and HE09 of the 'draft/unsigned' SoCG [REP5-058] indicate ongoing</i></p>	<p>Response</p> <p>Significant progress has been made with regards to revisions of the Onshore archaeology (Requirement 9). The most recent revision was received from the applicant this morning (03/03/2025), and this latest version reflects progress being made on the drafting of Archaeological Mitigation Strategy (AMS) and revised WSI.</p>



	<p><i>discussions between the Applicant and Historic England in relation to the wording for Condition 13(2) of Part 2 of Schedule 11 and Requirement 9(1) of the draft Development Consent Order.</i></p> <p><i>Advise on whether any progress is being made to agree wording within the dDCO and the likelihood of the matters that were unresolved at Deadline 5 being resolved before the Examination's close.</i></p>	<p>It is anticipated agreement will be reached on the final version and this will be communicated with the ExA via the SoCG.</p> <p>The DCO wording at Section 11.2 within Volume 6, Chapter 11 (Offshore Archaeology and Cultural Heritage), acknowledges the curatorial responsibilities for Historic England, as seaward of Mean Low Water Springs (MLWS), and Essex County Council landward of MLWS. However, it is usually the case that local authority jurisdiction (e.g. Essex County Council as the local curator) will be landward of Mean Low Water (MLW) not MLWS.</p> <p>We do however consider it a matter for the Applicant to confirm whether any works to deliver this proposed project will occur within any intertidal area within the boundary of Essex County. If this is the case, then the Draft Development Consent Order (PINs Ref: REP5-008 – track changes) in Schedule 11 (Deemed marine licence – Transmission Assets) that Condition 13(2) should be amended to:</p> <p>“Subject to condition 13(3), the licensed activities or any relevant stage of those activities must not commence unless no later than six months prior to the commencement a marine written scheme of archaeological investigation for the stage in construction has been submitted to and approved by the MMO in writing, in accordance with the outline marine written schemes of investigation, and in accordance with industry good practice, in consultation with the statutory historic body and <i>Essex County Council</i>.”</p>
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