

Historic England Relevant Representation submitted November 2023

Introduction

Historic England is the Government's statutory adviser on the historic environment. It is our duty under the National Heritage Act 1983 to secure the preservation and enhancement of the historic environment. This extends to monuments in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England. Our objective is to ensure that the historic environment generally, and marine and designated heritage assets especially, are fully considered in the determination of this DCO.

We have provided substantive pre-application advice about the scope of environmental assessment and the PEIR. The applicant has provided an Environmental Statement with supporting appendices and other documentation with the application.

Historic England do not object in principle to the Proposed Development. However, we have concerns that harm to the historic environment may result from its construction, operations and maintenance, and decommissioning.

The local authority heritage advisors for West Sussex County Council and the South Downs National Park Authority are the Planning Inspectorate's primary advisors on onshore non-designated heritage assets. However, due to the potential for non-designated heritage assets of archaeological interest to be present which may be demonstrably of equivalent significance to Scheduled Monuments, we will provide comment as appropriate on the issue.

Representation:

Significance of the Study Area

Parts of the onshore Study Area have demonstrable historical and archaeological interest (exceptional in some areas). This includes several scheduled monuments: Medieval earthworks east and southeast of St Mary's Church; Itford Hill style settlement and an Anglo-Saxon barrow field at New Barn Down; Prehistoric flint mine and part of a round barrow cemetery at Blackpatch, Farm; Group of four bowl barrows at the Chantry Post; Muntham Court Romano-British site.

Furthermore, there is high potential for archaeological deposits outside the scheduled areas that may be of equal significance. This is particularly notable in Zone 2: South Downs.

Within the marine archaeology study area, the Applicant has identified 179 known marine heritage receptors including 100 wrecks and 17 recorded aircraft losses. The area has been shown to also contain a complex system of prehistoric inundated valleys and channels. There may also be related archaeological potential at the proposed landfall location.

Concerns regarding the Proposed Development

1. Inadequate onshore archaeological baseline assessment and evaluation

The reporting fails to fully understand that the archaeological resource, in some areas, must be considered at a landscape scale, rather than as individual, spatially defined sites.

For example, although the chosen onshore route avoids the scheduled areas of the Blackpatch prehistoric flint mine and barrow cemetery and the New Barn Down monument, it passes through an area of the South Downs that has very high potential for discovery of archaeological remains of equal significance to, and potentially directly related to, the scheduled sites.

We raised concerns previously that sufficient archaeological evaluation to understand the impacts on archaeological remains of potentially national significance had not taken place along the onshore route.

We advised that if appropriate evaluation work was not done prior to application for DCO, the Environmental Statement should describe how the project will provide for retention in situ of any archaeological remains of national significance that are discovered during works.

Having reviewed the information supporting the application it appears that our concerns about the likely presence of, and harm to, potentially important non-designated archaeological remains, have not been addressed.

The applicant has not clearly and convincingly demonstrated how they would practicably provide for retention in situ.

In the embedded environmental measures, we consider there is too much reliance on the recording of archaeological remains as mitigation. Avoiding harm to nationally important heritage assets, not mitigation of impacts, should be the primary objective.

2. Limitations of marine archaeology evaluation

We note that, following our comments on the PEIR consultation exercise, all potential effects on the marine historic environment previously scoped out have been scoped in and are now included and assessed in this Environmental Statement (ES).

We are aware that marine geophysical survey was undertaken in 2020 and in 2021 and we concur with the Applicant that there is the possibility that presently unidentified marine heritage receptors might be discovered within the proposed DCO Order Limits which could be impacted directly or indirectly by the proposed development.

The ES describes the use of historic datasets and geophysical data acquired for this project. However, it is apparent that geotechnical survey work has not been conducted. It is therefore important that the Outline Written Schemes of Investigation (WSI) provides for geoarchaeological analysis of geotechnical survey materials. We will provide further advice as may be necessary in our Written Representation.

3. Inaccurate assessment of magnitude of impact and significance of effect

Embedded environmental measures (EEM), such as recording archaeology before any loss, would not reduce harm or magnitude of impact. While investigating archaeology at risk of loss or disturbance is essential and will reduce the loss of

knowledge and understanding, it cannot reduce the actual harm. Therefore, the downgraded assessment of the impact and the resultant effects being classified as 'Not Significant' is misguided and misleading.

This pertains to both onshore and marine heritage receptors.

Policy

The National Policy Statements are of relevance to the proposals: Overarching National Policy Statement for Energy (EN-1) (Department of Energy and Climate Change (DECC), 2011a); National Policy Statement for Renewable Energy (EN-3) (DECC, 2011b); and National Policy Statement for Electricity Networks (EN-5) (DECC, 2011c).

Each of these statements includes policies specifically related to the avoidance of harm to heritage assets and guidance for the Examining Authority on determining applications which would cause harm to the significance of heritage assets.

Historic England's Position

Historic England do not object in principle to the Proposed Development.

However, we consider there is the potential for a high level of harm to non-designated archaeological heritage assets, some of which may be of national significance. This pertains to both the onshore and marine receptors, but particularly concerns the area within Zone 2: South Downs, which has a concentration of nationally important heritage assets and high archaeological potential.

Our concerns therefore are that i) insufficient evaluation has been done in advance of the application for onshore, intertidal and offshore areas, ii) the onshore route selection process was determined without due regard to the potential significant effects on heritage, and iii) the embedded environmental measures do not include convincing and practicable provision to avoid the risk of harm to potentially nationally important archaeological remains.

The Development Consent Order should contain requirements to ensure that appropriate safeguards are in place regarding the historic environment.

For example, the outline WSIs for onshore (Document 7.9) and Marine (Document 7.13) will be key documents to ensure adequate provision for historic environment protection, mitigation and enhancement post DCO, should consent be forthcoming. These documents should form the basis of detailed WSIs to be submitted for approval to the relevant bodies and secured through the Schedule of Requirements and the Deemed Marine Licence respectively, should consent be granted.

The results of archaeological work undertaken in accordance with the onshore and marine WSIs should inform amendments to the design to avoid or mitigate harm to heritage assets. Harm to nationally important heritage assets should be avoided, if possible.

If consent is granted, provision should be made in the Schedule of Requirements to secure avoidance and/or mitigation of harm by requiring the approval of Relevant Authorities.

The scale of this project requires the collection of a significant quantity and variety of historic environment and archaeological data in a wide range of formats including digital and physical artefact resource. We recommend it should be a requirement of the DCO, should it be granted, that a project plan be approved by the LPA for a secure project archive and outreach programme, which should then be implemented to the satisfaction of the relevant authorities.

For the reasons outlined above, Historic England wishes to register its interest in the examination of the Rampion 2 Offshore Wind Farm DCO.