



Historic England

Richard Allen
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol BS1 6PN

3rd June 2024

Dear Mr Allen,

Planning Act 2008 (as amended) and The Infrastructure Planning (Examination Procedure) Rules 2010 (as amended)

**Application by Rampion Extension Development Limited for an Order Granting Development Consent for the Rampion 2 Offshore Wind Farm
PINs Ref: EN010117**

DEADLINE 4 SUBMISSION – COMMENTS ON DOCUMENT SUBMITTED BY THE APPLICANT AT DEADLINE 3 (25th APRIL 2024) AND MATTERS ADDRESSED AT ISSUE SPECIFIC HEARING ON 16th MAY 2024

Historic England registration identification number: 20045343

We offer these comments on the documents submitted by the Applicant at Deadline 3 (25th April 2024) and in reference to matters addressed at the Issue Specific Hearing held on 16th May, which we observed online as relevant to our role and responsibilities. Please use this letter as our submission made earlier today incorrectly referenced the wrong examination deadline.

1. Applicant's second update to the draft DCO – PINs Ref: REP3-004
In reference to *Rampion 2 Wind Farm; Category 3: Draft Development Consent Order*, Date: April 2024; Revision D; Applicant's Document Reference: 3.1
 - 1.1 Schedule 1, Part 3 (Requirements), 19(1) we request that text is included to clarify that any site-specific Written Scheme of archaeological Investigation (WSI) is to be produced in consultation with West Sussex County Council (WSCC) with respect to County Council landscape and environment services, and prior to submission for approval by the relevant planning authority. This request is consistent with requirements for consultation with West Sussex County Council (e.g. Requirement 32(1)), as explained in paragraph 9.13.36 in



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Rampion 2 Wind Farm Category 3: Development Consent Order Explanatory Memorandum (tracked changes); Date: April 2024; Revision C; Applicants Document Ref: 3.2; PINs Ref: REP3-006. We also take this opportunity to refer you to Requirement 18 in *Sheringham Shoal and Dudgeon Extensions Offshore Wind Farm Order 2024* (as granted by Secretary of State, dated 17/04/2024); this specific requirement ensures consultation occurs with a countywide service, such that the text includes "...after consultation with Norfolk County Council and the statutory historic body."

- 1.2 We are concerned that the devolving of post consent heritage matters to different authorities could add unnecessary complexity, particularly given that this is a linear scheme where nationally significant heritage assets would transcend across different areas of responsibility. Specifically, we are also concerned whether all the local authorities in question would have appropriate specialist heritage advisors and capacity available to oversee this process. This would need to include the approval and monitoring of site specific WSI's, and the extensive fieldwork and post excavation monitoring that this proposal would generate. Given that WSCC have overseen the production of the overarching WSI's and have provided detailed advice on the scheme to date, we also think they would be appropriately placed to continue.
- 1.3 Schedule 1, Part 3, 19(5) we request amendment of the first sentence to: "Should archaeological remains be left in situ on any site, a site-specific archaeological management plan must be submitted to and approved in writing by the relevant planning authority following consultation with West Sussex County Council."
- 1.4 Schedule 11 (Deemed Marine Licence – Generation Assets), Part 2 (Conditions), 11(2)(c) the Applicant has retained 6 months as the submission timeframe to the MMO on the basis that 6 months is stated for other project documentation e.g. the project environmental management plan (see paragraph 10.2.11 *Rampion 2 Wind Farm Category 3: Development Consent Order Explanatory Memorandum* (as referenced above). We have no further comment to offer and accept the retained timeframe.
- 1.5 We accept the statement made in paragraph 10.2.10 in *Rampion 2 Wind Farm Category 3: Development Consent Order Explanatory Memorandum*, as referenced above) that the project specific WSI (produced in accordance with any outline marine WSI) for approval by the MMO is to follow "...consultation with the statutory historic body" (as stated in draft Deemed marine Licence – Generation Assets, Condition 11(2)).
- 1.6 Schedule 12 (Deemed marine Licence – Transmission Assets) it is our advice that the final sentence of condition 11(2) is amended as follows: "...following consultation with West Sussex County Council and the statutory historic body." We stand by this advice as stated in our letter to you, dated 25th April 2024 [PINs Ref: REP3-075] and in recognition of the attention given to the risk of encountering presently unknown archaeological materials as explained by West Sussex County Council and South Downs National Park at the Issue Specific Hearing on 16th May.



1.7 Schedule 12 (Deemed Marine Licence – Transmission Assets), Part 2 (Conditions), 11(2)(c) the Applicant has retained 6 months as the submission timeframe to the MMO on the basis that 6 months is stated for other project documentation (as acknowledged above). We have no further comment to offer and accept the retained timeframe.

2 Comments on any further information/submissions received by Deadline 3: Marine Historic Environment

2.1 Issue Specific Hearing (held 16th May), Item 10 – we noted the inclusion of an item regarding any agreement of an updated Outline Marine Written Scheme of Investigation [APP-235]. We are aware that the Applicant has submitted the following document: *Rampion 2 Wind Farm, Category 7: Other Documents, Outline Marine Written Scheme of Investigation* (tracked changes); Date: April 2024; Revision B [PINs Ref: REP3-042]. We offer the following comments.

2.2 We are pleased to see acknowledgment that WSCC is the archaeological curator landward of Landward of Mean Low Water Springs and therefore the appropriate party with whom consultation should be conducted to produce any site-specific WSI (see paragraph 2.4.1).

2.3 Section 5.7 (Historic Seascape Characterisation) has not been removed as per our advice in our Written Representation [PINs Ref: REP1-055]. We have therefore reviewed the document submitted by the Applicant entitled *Rampion 2 Wind Farm; Category 8: Examination Documents; Applicant's Response to Historic England Deadline 1 Submission on Marine Archaeology*; Date: April 2024; Revision A; Document Reference: 8.63 [PINs Ref: REP3-057]. It is apparent that the Applicant continues to interpret Historic Seascape Characterisation as a "...known and potential archaeological receptors that could be impacted", which is not in accordance with our advice. Historic Seascape Characterisation is exclusively a means to set the context within which heritage assets are located. Heritage assets are therefore the sensitive receptor. However, given that this is an outline document and not included in Schedule 16 (Documents to be certified), we see it as representing draft documentation for revision and amendment should consent be obtained.

2.4 Section 6 (Embedded environmental measures) we accept the edits introduced on Table 6-1.

2.5 Section 6.2 (Embedded environmental measures for wrecks and obstructions), we accept the edit introduced in paragraph 6.2.2.

2.6 Section 6.5 (Embedded environmental measures for deposits of geoarchaeological potential) it is apparent that our comments submitted previously (as referenced above) have not resulted in any amendment to the outline WSI. The Applicant in the document *Response to Historic England Deadline 1 Submission on Marine Archaeology* (as referenced above) tries to address this matter in reference to published guidance and through future use of survey specific Method Statements (as described in line Ref: 11.16). It is therefore important, should consent be obtained, that a suitable WSI is to be produced in consultation with Historic England, in accordance with any Deemed



Marine Licence, and thereby allow for subsequent survey method statements to be produced in consultation with Historic England.

- 2.7 Table 6-4 (Further site-specific documents, works and surveys) states that a Draft Marine WSI is to be produced “Based on this Outline Marine WSI, to be agreed with the Regulator (MMO) to ensure archaeological objectives are considered and impacts on marine heritage receptors are avoided and mitigated.” It is therefore essential that the Applicant is obliged, should consent be obtained, to consult the “statutory historic” bodies i.e. Historic England (Generation and Transmission Assets) and West Sussex County Council (Transmission Assets) in order to produce a marine WSI, as provided through Schedule 11 and 12 draft Deemed Marine Licences.
- 2.8 Section 8 (Schemes of investigation), no amendments have been introduced to address the comments submitted previously in our Written Representation (as referenced above). We have no further comment to offer.
- 2.9 Section 9 (Arrangements for review of the WSI), no amendments have been introduced to address the comments submitted previously in our Written Representation (as referenced above). We have no further comment to offer.
- 2.10 In conclusion, we are not satisfied by the amended marine outline WSI (as referenced above) or in the response made by the Applicant in *Examination Documents; Applicant’s Response to Historic England Deadline 1 Submission on Marine Archaeology* (as referenced above). We therefore agree with the removal of outline marine Written Scheme of Investigation [PINs Ref: APP-235] from Schedule 16, Part 2 (Other documents to be certified).

3 Comments on any further information/submissions received by Deadline 3: Onshore Historic Environment

- 3.1 We are aware that the Applicant has submitted the following document: *Rampion 2 Wind Farm, Category 7: Other Documents, Outline Onshore Written Scheme of Investigation* (tracked changes); Date: April 2024; Revision B [PINs Ref: REP3-036]. We provide comment below:
- 3.2 C-80: we recommend amending ‘appropriate’ to ‘proportionate’.
- 3.3 C-79: Mitigation of significant adverse effects during construction should be through avoidance first before mitigation. Only once harm has been avoided and minimised should mitigation then apply. This is detailed in the following paragraphs, but needs to be made clear here.
- 3.4 C-225: A wider range of engineering solutions should be considered in order to avoid and minimise harm. All possible techniques should be identified and detailed in the Outline Onshore WSI and followed through in the site specific onshore WSI’s. It would be better to present this as an agreed suite of techniques that could be considered and drawn from as required.
- 3.5 Section 1.3.8: Please see our advice for paragraph 1.1 above. We are concerned that the applicant is proposing separation of curatorial advice



between different local authorities. We recommend that WSCC retains overarching curatorial responsibilities for this project if approved, and that the Outline Onshore WSI is updated accordingly.

- 3.6 Section 1.3.8: Regional Advisor is not a role at Historic England and should be replaced with Historic England Regional Inspector of Ancient Monuments (and followed through where relevant elsewhere in the document).
- 3.7 Sections 4.5.2-4.5.5: The only geophysical technique referred to here is magnetometry. We recommend that a suite of available techniques should be identified to respond according to different geological and site-specific factors. There may be geophysical survey techniques that aid the evaluation process and better refine where intrusive fieldwork may be targeted. This would be particularly relevant for areas of high potential in relation to designated assets, and in areas where complex geological/geoarchaeological deposits may be situated.
- 3.8 In conclusion, we are broadly satisfied by the amended Onshore Outline WSI (as referenced), subject to the Examination Authorities consideration of the suggested amendments detailed above.

4 Comments on any further information/submissions received by Deadline 3: Applicants' use of case studies at the Issue Specific Hearing on 16th May.

- 4.1 We urge the Examination Authority to carefully consider whether case studies presented to justify the applicants' approach to the historic environment are relevant and appropriate. For example, we do not think the SLP (Southampton to London Pipeline project, PINs Ref: EN070005) a comparable example. The SLP demonstrably avoided harm to onshore nationally important designated heritage assets by careful selection of route, ensuring that there were no planned encroachments into known areas of high potential for nationally important archaeological remains.
- 4.2 Conversely, the Rampion 2 chosen onshore route was identified as being the most harmful for heritage, in particular in relation to designated assets and their associated remains. The approach taken for the SLP of archaeological evaluation largely post consent, is also not therefore a directly comparable approach.

We hope this advice is helpful to your decision-making and urge you to take these matters into consideration as part of the examination process.

Yours sincerely,



Dr Christopher Pater
Head of Marine Planning

cc. Co-author Rebecca Lambert (Inspector of Ancient Monuments, London & South East Region, Historic England)

