

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

1st August 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 6 SUBMISSION – Closing comments** 

Historic England registration identification number: 20045343

We offer final closing comments in regard to the following matters:

- 1. Examining Authority's (ExA) Consultation Draft Development Consent Order
  - 1.1 The draft DCOs for both onshore and in the deemed Marine Licences now include requirements for consultation with West Sussex County Council (e.g. Requirement 19 Onshore Archaeology) and a new requirement at 19(5) regarding action in the event of discovery. We support these amendments introduced by the Examination Authority to the draft Development Consent Order.
- 2. <u>Outline Marine Written Scheme of Investigation (revision C, July 2024, ExA Ref: REP5-076)</u>
  - 2.1 The Applicant has accepted and implemented the changes we advised were necessary, as detailed in our Written Representation and in our response to Deadline 4 (3<sup>rd</sup> June) and have resubmitted an Outline Marine WSI. The OMWSI (dated 9<sup>th</sup> July 2024, ExA Ref: REP5-076) is included in Schedule 16





(documents to be certified), Part 2 (other documents to be certified). We accept its inclusion.

- 2.2 The Marine OWSI is much improved and we are pleased to see that archaeological investigations are more embedded into pre-construction and construction phases. The recognition that geoarchaeological assessments are important to describe palaeolandscapes before these are irreversibly damaged and that they must be embedded into the geotechnical surveys/sampling, is welcome. As is stated in 6.5.5 and 8.4.14, early discussions between geotechnical and archaeological contractor *must* happen to avoid lost or damaged cores no longer suitable for archaeological investigations. If core logs are reviewed by the qualified marine archaeologist (8.4.17, i.e. after cores have been opened and recorded for geotechnical data), they should be informed as to the state of the cores so they can decide whether further coring is necessary (as per 6.8.5). The geoarchaeological programme should include suspected palaeochannels and layers of peat, as well as areas not previously described ahead of project impacts.
- 3. Outline Onshore Written Scheme of Investigation (revision C, July 2024, EXA ref: REP5-070)
  - 3.1 We are pleased to see the changes we recommended in our Deadline 4 submission (3<sup>rd</sup> June) have been accepted and included by the Applicant. WSCC are identified as the lead curator for future archaeological work, and there is scope included in the OWSI for further archaeological investigations and mitigation options if significant remains are discovered.
  - 3.2 One additional point to raise is that clarity on archiving matters is required. This could be achieved through consistency of terminology through the OWSI; 'archive repository' and 'museum', and 'site code' and 'accession number' are used interchangeably but are different things. We also recommend an appropriate digital archiving strategy should be developed, following Historic England published guidance:

https://historicengland.org.uk/research/methods/archaeology/archaeological-archives/

I hope this advice is helpful to your decision-making and urge you to take these matters into consideration as part of the examination process. We thank you also for the opportunity to engage in a positive dialogue during the examination process.

Yours sincerely,

Rebecca Lambert (Inspector of Ancient Monuments, London & South East Region, Historic England)

cc. Co-author Dr Christopher Pater, Head of Marine Planning



