



Historic England

Robert Jackson
Lead Member of the Panel of Examining Inspectors –
Morecambe Offshore Windfarm Generation Assets
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol BS1 6PN

22nd January 2025

Dear Mr Jackson,

Application for an Order Granting Development Consent for the Morecambe Offshore Windfarm Generation Assets

PINs Ref: EN010121

The Examination Authority – Deadline 3

Historic England registration identification number: 20049980

We offer this response regarding the First Questions as were also directed to Historic England, as issued on 18th December 2024.

Cultural Heritage (including Marine Archaeology) – Effects on assets

1CH4 – Identification of heritage assets

In making their assessment the Applicant has only rarely referred to non-designated heritage assets. This question relates to both designated and non-designated heritage assets.

Do IPs agree with the Applicant's assessment as to which heritage assets should be scoped out of assessment? If not, could they identify the asset including its heritage significance, and explain why the significance of the asset would be affected by the Proposed Development.

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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.

Response – We agree with the assessment conducted by the Applicant. We consider adequate and sufficient information has been presented in the Environmental Statement regarding heritage assets (i.e. maritime and aviation archaeology within Examination Document APP-052). We also acknowledge the work completed to corroborate desk-based sources of information with geophysical survey data acquired for this proposed project. We therefore consider that sufficient attention has been given to determining risk of encountering known or presently unknown heritage assets.

1CH6 – Settings of heritage assets

In paragraph 15.216 of ES Chapter 15 [REP1-034], the Applicant indicates that construction effects on coastal (terrestrial) heritage assets “are not anticipated to give rise to material harm”. It then goes on to indicate “changes are anticipated to be negligible adverse significance”.

Could the Applicant please clarify whether it considers the Proposed Development, within the terms set out in NPS EN-1, would result in less than substantial harm to the settings and significance of the heritage assets or preserve the settings and significance of the heritage assets? Could this also be reconciled with Tables 15.25 and 15.33.

Any reassessment should consider both the Proposed Development on its own and cumulatively with other identified plans and projects.

Response – We consider this to be a question focused on assessment and the detail included within Tables 15.25 and 15.33 that should be answered by the Applicant. However, we appreciate that you have also directed this question to Historic England, and we appreciate the attention given to “Impact 5: Impacts to the setting of coastal (terrestrial) heritage assets”. In consideration of the focus of our attention on nationally important designated heritage assets, we are satisfied by the heritage assets included within the assessment conducted by the Applicant. However, we appreciate that the relevant local historic environment advice service (i.e. the county archaeologist) might wish to offer advice regarding other elements of the historic environment such as Grade II Listed Buildings and/or other heritage assets that might be of local or regional importance.

1CH7 – Settings of Blackpool Heritage Assets

In Section 8.7 and 8.8 of ES Appendix 15.3 (Settings assessment) [APP-077] the Applicant asserts that the Proposed Development does not affect the settings of various heritage assets in Blackpool. Could the Applicant, and Interested Parties who wish, respond to the proposition that these assets only exist because of the proximity to the sea, and its open seascape. Consequently, any interruption to the existing seascape would affect their settings.

If IPs agree with this proposition, could they set out their views as to the effect on the identified assets.

Response – We are aware the Examination Document APP-077 includes consideration of a high number of designated assets on the coast. Given that our statutory remit is to deal with higher graded (designated) assets, e.g. Grade I and II*

Listed Buildings, we acknowledge that most of the highly grade heritage assets identified and assessed are a considerable distance away from the proposed Morecambe Windfarm Generation assets array area. We also appreciate that there are already numerous wind turbine generators visible in the distance from locations such as Blackpool, Heysham and Cockersand. However, we do not see any reason to question the assessment carried out, or the conclusion set out in Document APP-077.

In conclusion, it is our advice that the presence of this proposed development, while visible from designated heritage assets along the coastline, including identified heritage assets in the Blackpool area, will not detract from their archaeological, historic, and architectural interest. This is in full consideration of an adjacent marine area that contains several offshore windfarm developments. We do not consider there to be any change in the significance of the identified designated heritage assets as related to changes in their setting.

Yours sincerely,



Dr Christopher Pater
Head of Marine Planning