

**RWE Renewables UK Dogger Bank  
South (West) Limited**

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South (East) Limited**

# **Dogger Bank South Offshore Wind Farms**

**Environmental Statement**

**Volume 7**

**Appendix 22-1 Onshore Archaeology and Cultural Heritage  
Consultation Responses**

**June 2024**

**Application Reference: 7.22.22.1**

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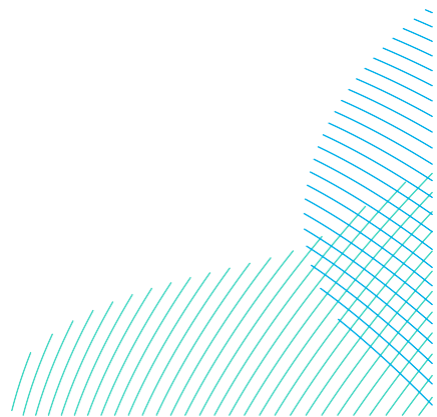
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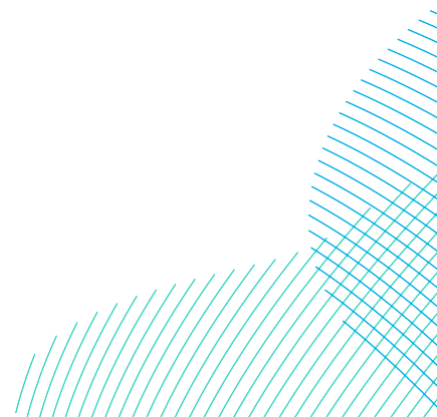


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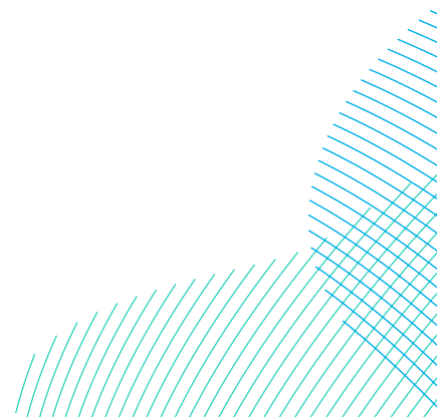
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## Glossary

Term	Definition
Dogger Bank South (DBS) Offshore Wind Farms	The collective name for the two Projects, DBS East and DBS West.
Evidence Plan Process (EPP)	A voluntary consultation process with specialist stakeholders to agree the approach, and information to support, the Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) for certain topics.
Expert Topic Group (ETG)	A forum for targeted engagement with regulators and interested stakeholders through the EPP.
Geoarchaeology	The application of earth science principles and techniques to the understanding of the archaeological record. Includes the study of soils and sediments and of natural physical processes that affect archaeological sites such as geomorphology, the formation of sites through geological processes and the effects on buried sites and artefacts.
Horizontal Directional Drilling (HDD)	HDD is a trenchless technique to bring the offshore cables ashore at the landfall and can be used for crossings other obstacles such as roads, railways and watercourses onshore.
Jointing bays	Underground structures constructed at regular intervals along the onshore cable route to join sections of cable and facilitate installation of the cables into buried ducts.
Landfall	The point on the coastline at which the Offshore Export Cables are brought onshore, connecting to the onshore cables at the Transition Joint Bay (TJB) above mean high water.
Onshore Development Area	The Onshore Development Area for ES is the boundary within which all onshore infrastructure required for the Projects would be located including Landfall Zone, Onshore Export Cable Corridor, accesses, Temporary Construction Compounds and Onshore Converter Stations.

Term	Definition
Onshore Export Cable Corridor	This is the area which includes cable trenches, haul roads, spoil storage areas, and limits of deviation for micro-siting. For assessment purposes, the cable corridor does not include the Onshore Converter Stations, Transition Joint Bays or temporary access routes; but includes Temporary Construction Compounds (purely for the cable route).
Onshore Export Cables	Onshore Export Cables take the electric from the Transition Joint Bay to the Onshore Converter Stations.
Onshore Substation Zone	Parcel of land within the Onshore Development Area where the Onshore Converter Station infrastructure (including the haul roads, Temporary Construction Compounds and associated cable routing) would be located.
Scoping opinion	The report adopted by the Planning Inspectorate on behalf of the Secretary of State.
Scoping report	The report that was produced in order to request a Scoping Opinion from the Secretary of State.
Setting	The NPPF identifies setting as that which encompasses an asset's surroundings in which it is experienced. The extent of setting is not fixed and can contribute both positively and negatively to the heritage significance of an asset.
The Applicants	The Applicants for the Projects are RWE Renewables UK Dogger Bank South (East) Limited and RWE Renewables UK Dogger Bank South (West) Limited. The Applicants are themselves jointly owned by the RWE Group of companies (51% stake) and Masdar (49% stake).
The Projects	DBS East and DBS West (collectively referred to as the Dogger Bank South offshore wind farms).
Transition Joint Bay (TJB)	The Transition Joint Bay (TJB) is an underground structure at the landfall that houses the joints between the Offshore Export Cables and the Onshore Export Cables.



## Acronyms

Term	Definition
ADBA	Archaeological Desk-Based Assessment
CIfA	Chartered Institute for Archaeologists
DCO	Development Consent Order
DBS	Dogger Bank South
DMV	Deserted Medieval Village
EIA	Environmental Impact Assessment
ES	Environmental Statement
EPP	Evidence Plan Process
ETG	Expert Topic Group
IEMA	Institute of Environmental Management and Assessment
IHBC	Institute of Historic Building Conservation
PEIR	Preliminary Environmental Information Report
RWE	RWE Renewables UK Ltd
UK	United Kingdom
WSI	Written Scheme of Investigation

## 22.1 Consultation Responses

### 22.1.1 Introduction

1. This appendix covers those statutory consultation responses that have been received as a response to the Scoping Report (2022), the Preliminary Environmental Information Report (PEIR) (2023) and Expert Topic Group (ETG) meetings.
2. Response from stakeholders and regard given by the Applicants have been captured in **Table 22-1-1**.

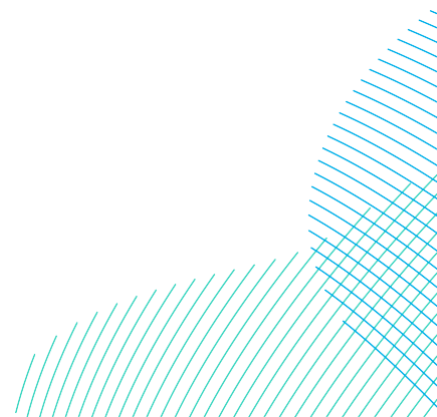
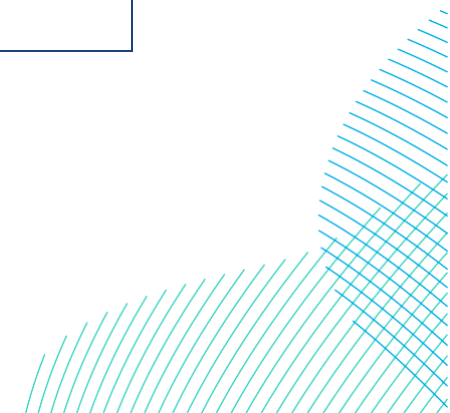


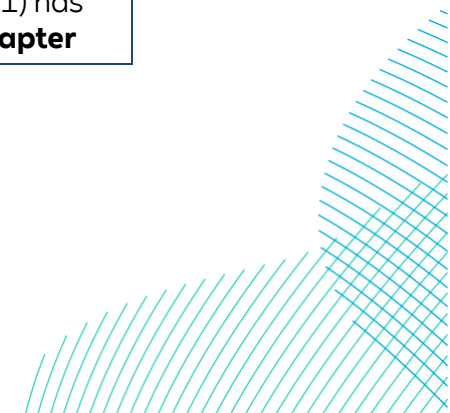
Table 22-1-1 Consultation Responses Related to **Volume 7, Chapter 22 Onshore Archaeology and Cultural Heritage (application ref: 7.22)**

Comment	Project Response
<b>ETG Meeting 1 – Historic England, East Riding of Yorkshire Council 15/09/2021</b>	
An overall introduction to the Project was provided, including Project details, the route selection process, and Scoping Assessment Methodology.	N/A
<b>Planning Inspectorate Scoping Opinion 02/09/2022</b>	
<p>4.5.1 "The Scoping Report states that the Proposed Development will not result in direct physical impacts to onshore heritage assets during operation, however no evidence is provided in relation to hydrological changes that may extend into the operational phase or in relation to heating effects from electrical infrastructure.</p> <p>It is noted that section 3.4 rules out soil heating but identifies impacts to soil drainage during operation, and this evidence should be applied to the archaeology assessment in the ES. It is also noted that section 3.3 scopes in assessment of surface water changes and flood risk during operation, and it is not clear how this has informed the proposed scope of the archaeological assessment.</p> <p>In the absence of this evidence, the Inspectorate does not agree that these matters can be scoped out of the ES. The ES should provide an assessment of</p>	<p>Noted. The likely significant effects arising from changes in preservation conditions as a result of hydrological changes during the operation phase have been assessed and presented in the ES section 22.6.2 assuming a worst-case scenario. The likely significant changes in preservation conditions as a result of hydrological changes during the construction phase are assessed in section 22.6.1 of the ES.</p>

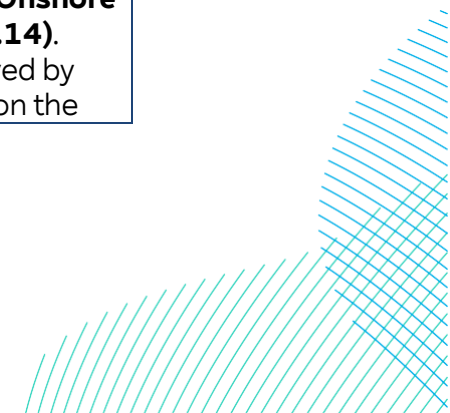




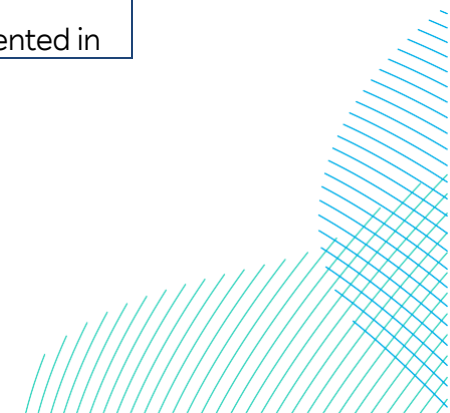
Comment	Project Response
<p>the likely significant effects arising from changes in preservation conditions during the operational phase."</p>	
<p>4.5.2 "The Report states that further investigations such as geophysical survey will be undertaken following the results of the desk-based assessment and trial trenching will be considered if required. The ES must provide a clear understanding of the impacts on the known deposits, assess the impact of the route on previously unknown deposits (geophysics and where necessary trial trenching along the cabling route and substations) and agree a mitigation strategy that can be submitted with the DCO application. The Inspectorate considers that an appropriate evaluation technique will need to be defined in consultation with the County archaeologists and Historic England. Supporting technical heritage information (full survey reports) should be included as appendices to the ES."</p>	<p>The results of desk-based assessment and geophysical survey completed up to end of January 2024 are presented in <b>Volume 7, Appendices 22.2 to 22.7 (application ref: 7.22.22.2 to 7.22.22.7)</b>. A summary of these results is provided in section 22.5 and informs the impact assessment in section 22.6 of the ES. Appropriate evaluation techniques have been discussed and agreed with the ETG.</p>
<p>4.5.3 "In addition to the documents listed, the Inspectorate advises that the following guidance documents should be taken into consideration:</p> <ul style="list-style-type: none"> <li>• Historic England Advice Note 15 Commercial Renewable Energy Development and the Historic Environment (2021): <a href="https://historicengland.org.uk/images-books/publications/commercial-renewable-energy-development-historic-environment-advice-note-15/heag302-commercial-renewable-energy-development-historic-environment/">https://historicengland.org.uk/images-books/publications/commercial-renewable-energy-development-historic-environment-advice-note-15/heag302-commercial-renewable-energy-development-historic-environment/</a>.</li> </ul>	<p>Noted. These guidance documents have been used to inform the impact assessment and mitigation requirements presented in section 22.6 of the ES.</p> <p>Document 'Archaeological Written Scheme of Investigation for Offshore Wind Farm Projects' (Crown Estate, 2011) has been used to inform <b>Volume 7, Chapter</b></p>



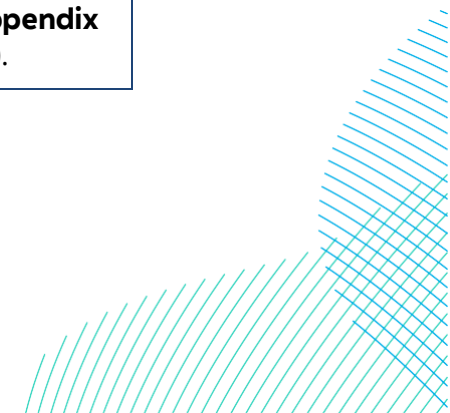
Comment	Project Response
<ul style="list-style-type: none"> <li>• Historic England (2016) Preserving Archaeological Remains <a href="https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/heag100a-preserving-archaeological-remains/">https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/heag100a-preserving-archaeological-remains/</a>.</li> <li>• Historic England (2019) Piling and Archaeology <a href="https://historicengland.org.uk/images-books/publications/piling-and-archaeology/heag270-piling-and-archaeology/">https://historicengland.org.uk/images-books/publications/piling-and-archaeology/heag270-piling-and-archaeology/</a>.</li> <li>• Crown Estate (2021) Archaeological Written Schemes of Investigation for Offshore Wind Farm Projects <a href="https://www.thecrownestate.co.uk/media/3917/guide-to-archaeological-requirements-for-offshore-wind.pdf">https://www.thecrownestate.co.uk/media/3917/guide-to-archaeological-requirements-for-offshore-wind.pdf</a>. "</li> </ul>	<p><b>17 Offshore Archaeology and Cultural Heritage (application ref: 7.17).</b></p>
<p><b>Scoping Opinion - Historic England 02/09/2022</b></p>	
<p>We felt that the suggested archaeological approach lacks a coherent research emphasis. The main reason for this is that the Onshore route traverses one of the most interesting and complex areas of archaeology in England. With the Yorkshire Wolds and its immediate hinterland a priority area for Historic England, with a research Framework for the Wolds (which is not referenced in the EIA Scoping Report), and recent work by the University of Reading that has established that large areas of Holderness are covered by warp deposits which have buried entire prehistoric landscapes. We therefore would have expected the applicant to meet with the Local Authority archaeologist to agree a suite of high-level research questions for the project, and this would help guide where physical interventions would be most</p>	<p>The Onshore Development Area has been refined throughout the EIA process. With regard to research framework, the Applicants have refined this based on ETG feedback and based on ETG input have provided an updated Research Agenda within the Trial Trenching WSI (not part of the DCO application) <b>and Outline Onshore WSI (Volume 8, application ref. 8.14)</b>. This Research Agenda was approved by the ETG via emails and a meeting on the</p>



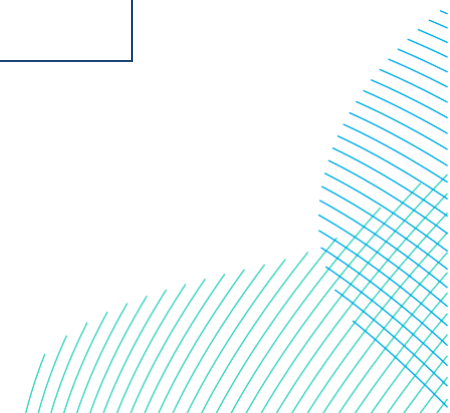
Comment	Project Response
<p>profitable and of greatest public benefit. Additionally, we find that EIA documents tend to follow a particular format and this format can get in the way of the applicant thinking in research terms, thinking creatively and about what the archaeology might or could achieve. Specifically, Table 1.5 and Methodology: We understand that the applicant is using an industry standard for assessing impact, but Historic England has some concerns about this 'standard'. The issue is that the 'standard' assesses 'significance of impact', whereas Historic England is concerned with the 'impact on significance'. This may seem a minor quibble over language, but there are real world implications in this distinction. The Developer therefore needs to acknowledge that there is a difference in approach and possibly outcomes and ensure that their assessment and analysis fully characterises significance, and impact on significance.</p>	<p>1st of August 2023. The Research Agenda will continue to be reviewed and updated as the Projects progress.</p> <p>The assessment methodology follows the Principles of Cultural Heritage Impact Assessment in the UK (IEMA, IHBC and ClfA, 2021) and is detailed further in section 22.4 of the ES. The assessment methodology adopted defines the heritage assets and their settings, likely to be impacted by the Projects and assesses the level of any resulting benefit, harm or loss to their significance.</p>
<p>Point 709: regarding targeted trial trenching. The text suggests that 'targeted trial trenching will be based on the results of baseline surveys and geophysical surveys where they have identified a high potential for buried archaeological remains to be present ...' we understand the suggested rationale but there needs to be a more imaginative response to sampling and trial trenching – as outlined in our General Point above.</p>	<p>Noted. An initial Phase 1 programme of trial trenching has been carried out at the landfall and Substation Zone and have been agreed in consultation with Humber Archaeology Partnership. Trial trenching plans were designed to target apparently blank areas in addition to areas of known potential. The interim results of archaeological trenching are presented in</p>



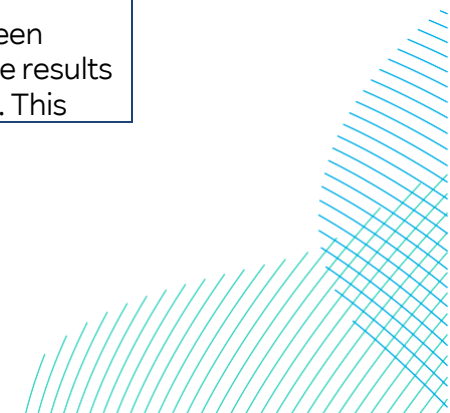
Comment	Project Response
	<b>Volume 7, Appendix 22.8 (application ref: 7.22.22.8).</b>
<p>Related to the above paragraph, is a proper analysis and assessment of setting and the contribution which setting makes to significance. Setting is not entirely visual and relates instead to the manner in which places are experienced. Views, viewpoints and view lines should not be solely assessed from PRow and public access locations: as the whole landscape is to be considered. The Developer is to undertake assessment which encompasses 'dynamic' or 'kinetic' movement through the landscape, exploring the manner in which places change, emerge and recede.</p>	<p>A full setting assessment (including photomontages) of heritage assets potentially affected by the Substation Zone is presented in <b>Volume 7, Appendix 22.5 (application ref: 7.22.22.5)</b> in the ES.</p>
<p>In Point 698, the Developers have stated how they intend to characterise the existing historic environment. Historic England points out that any archaeology and cultural heritage chapter of the EIA should start with a summary of the Geomorphology of the onshore study area.</p>	<p>Noted. The baseline geomorphology of the Onshore Development Area is presented in <b>Volume 7, Chapter 20 Flood Risk and Hydrology (application ref: 7.20)</b> and in summarised in <b>Section 22.5 of Volume 7, Chapter 22 Onshore Archaeology and Cultural Heritage (application ref: 7.22)</b>.</p>
<p>"In Point 707, the Developers have stated the data sources they utilised to help characterise the existing historical environment. Historic England would point out that the Rapid Coastal Zone Assessment for Yorkshire and Lincolnshire could be used to further inform the Baseline data, this can be</p>	<p>Noted. This resource was accessed to inform the Archaeological Desk Based Assessment (ADBA) (<b>Volume 7, Appendix 22.2 (application ref: 7.22.22.2)</b>).</p>



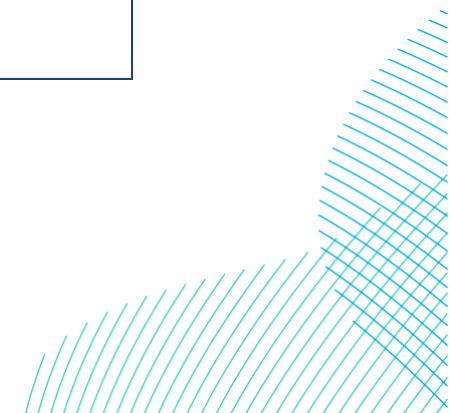
Comment	Project Response
<p>accessed here: (<a href="https://archaeologydataservice.ac.uk/archives/view/yorksacza_eh_2009/">https://archaeologydataservice.ac.uk/archives/view/yorksacza_eh_2009/</a>)."</p>	
<p><b>Historic England and Humber Archaeology Partnership - ETG 20/10/2022</b></p>	
<p><b>Geophysical Survey WSI:</b> WSI to be updated to include additional geophysical survey techniques such as magnetometry which provides good results even in areas of alluvial deposits. Opportunities for further discussions will be arranged once geophysical data is available to better understand blank area with the use of local knowledge.</p>	<p>Geophysical Survey WSI was updated in January 2023 and approved by Humber Archaeology Partnership.</p>
<p><b>Geophysics Priority Areas:</b> Recommended that the CITiZAN database be check for any additional records as they are not integrated into the HER.</p>	<p>Noted. This resource was accessed to inform the priority geophysical survey locations.</p>
<p><b>Historic England and East Riding of Yorkshire Council - ETG 19/01/2023</b></p>	
<p>Usual concern of setting studies is that they're conducted from set points and should take a more dynamic approach looking at how setting changes as you move through the landscape.</p>	<p>A site visit was arranged to identify how effects on setting may change across the landscape, and to agree heritage viewpoints.</p>



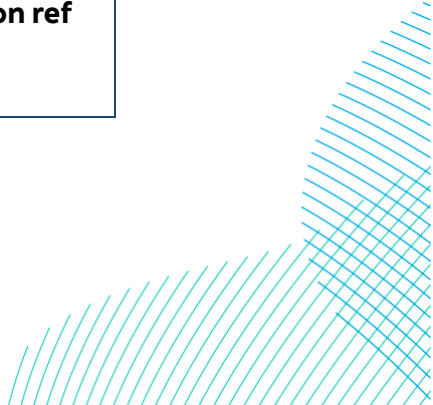
Comment	Project Response
<p>Main concern is the impact on the view from the Minster and Church of St Mary. Topography might rule out impacts on other sites such as Walkington Conservation Area.</p>	<p>A full setting assessment of heritage assets potentially affected by the Onshore Substation Zone is presented in <b>Volume 7 Appendix 22.5 (application ref: 7.22.22.5)</b>. This includes a detailed setting assessment and photomontages where appropriate.</p>
<p><b>Historic England and East Riding of Yorkshire Council - ETG 25/05/2023</b></p>	
<p>The ETG broadly agrees with the standard approach set out in the EIA Strategy</p>	<p>Noted.</p>
<p>Does the ETG broadly agree with the approach set out in the WSI for Geoarchaeology/Archaeology Watching Brief on Ground Investigation</p>	<p>Follow up emails were sent to those who did not attend the ETG on 25/05/2023 to confirm they accepted the WSI for Geoarchaeology/Archaeology Watching Brief on Ground Investigation.</p>
<p>What level of importance does the ETG value the upstanding earthworks at Nunkeeling DMV and the associated buried remains? HAP – Asset group is of schedulable quality and should be avoided if possible.</p>	<p>HAP – Asset group is of schedulable quality and should be avoided if possible. As the EIA has progressed, further route refinement and micro-siting has been carried out, informed directly by the results of ongoing archaeological surveys. This</p>



Comment	Project Response
	includes a diversion around Nunkeeling Deserted Medieval Village which is now outside the Onshore Development Area.
<p>Does the ETG broadly agree with the approach of an overarching trial trenching WSI and review/approval trenching plans on a rolling basis?</p> <p>HAP to review each phase of trial trenching plans prior to their submission to AOC Archaeology.</p>	Noted.
<p>Does the ETG broadly agree with the approach taken to trial trenching?</p> <p>HAP should be consulted whenever a trench needs to be moved.</p>	Noted.
<p>Does the ETG broadly agree with the approach set out for invoking any contingency?</p> <p>HAP is happy with the worst-case scenario approach</p>	Noted.
<p>As a worst case, would the ETG be able to accept an interim trial trenching report during examination?</p> <p>HAP indicated that given the timescales the Projects face it will be acceptable to provide reports for packages of trenching as they are complete, noting that HAP will also work in an iterative way on site with AOC Archaeology to monitor and sign off trenches.</p>	<p>Noted. The interim results of archaeological trenching are presented in <b>Volume 7, Appendix 22.8 (application ref: 7.22.22.8)</b>.</p>

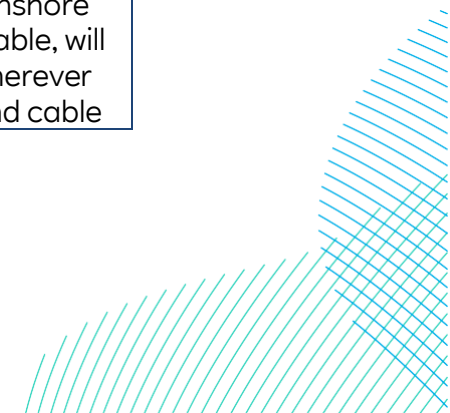


Comment	Project Response
<b>Section 42 Consultation - Historic England July 2023</b>	
We do not see anything within the PEIR on Outreach or Engagement	<p>Based on ETG feedback it was agreed that a dedicated Archaeology/Cultural Heritage page would be provided on the Projects website during archaeological works, as well as providing information and updates in the Projects newsletter. This dedicated page and specific updates within the Projects newsletter have been tied into the wider community engagement work outlined in the <b>Outline Onshore WSI (Volume 8, application ref. 8.14)</b>. The Applicants will also include information at local community outreach events. The Projects will continue to work with the ETG to ensure Outreach and Engagement is appropriately undertaken throughout the Projects' lifecycles.</p> <p>Details on further outreach and engagement is outlined within the <b>Outline Onshore WSI (Volume 8, application ref 8.14)</b> submitted as part of the DCO application.</p>

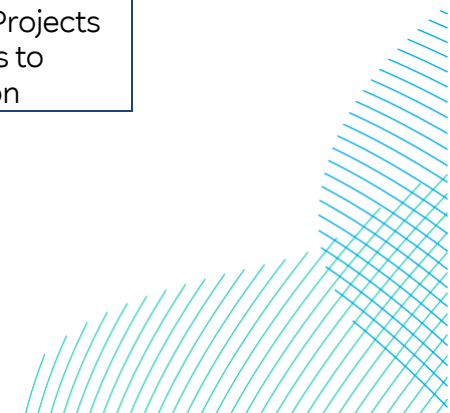




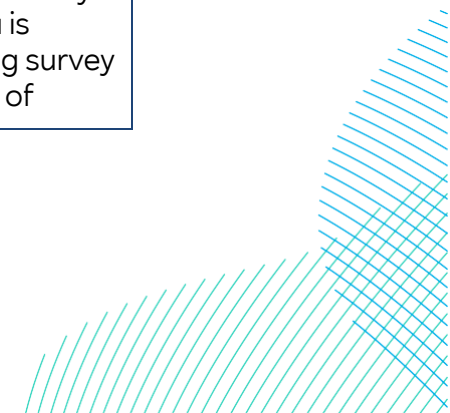
Comment	Project Response
<p>22.3.1 para 6: we note that there continue to be two possible landfall options. We welcome further clarification on this matter, in order to better understand the impact of the proposal.</p>	<p>As the EIA has progressed, further route refinement and micro-siting has been carried out, informed directly by the results of ongoing archaeological surveys i.e. geophysical survey to ensure areas of high archaeological potential are avoided, wherever possible within the confines of engineering and other environmental constraints. Only one landfall zone has been taken forward at application stage. Archaeology and cultural heritage considerations formed an important part of the site selection process.</p>
<p>Table 22-2 Decommissioning: we note that there is no final decision on decommissioning. We welcome further clarification on this matter, in order to better understand the impact of the proposal.</p>	<p>No final decision regarding the final decommissioning policy for the onshore project infrastructure including landfall, Onshore Export Cable Corridor and Onshore Converter Stations has yet been made. It is also recognised that legislation and industry best practice change over time. However, it is likely that the onshore project equipment, including the cable, will be removed, reused or recycled wherever possible and the transition bays and cable</p>



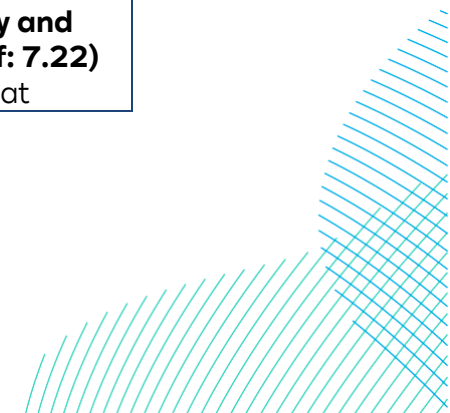
Comment	Project Response
	ducts being left in place. The detail and scope of the decommissioning works has been determined by the relevant legislation and guidance at the time of decommissioning and has been agreed with the regulator. It is anticipated that for the worst case scenario, the impacts will be no greater than those identified for the construction phase. A decommissioning plan for the onshore works would be submitted prior to any decommissioning commencing.
22.3.22, para 12 onwards: we note that there are two possible electrical solutions, with a number of final scheme permutations (para 12). We welcome further clarification on this matter in order to better understand the impact of the proposal. This is also related to paras 282 to 287 where the potential significance of effect varies from 'medium adverse to 'moderate to major'.	There is one electrical solution being considered for DBS West and DBS East, HVDC. Four export cables offshore are required for two HVDC projects. The two HVDC convertor stations would be located within the Onshore Substation Zone.
22.4.3 Impact assessment methodology: we have to repeat our discomfort with the methodology. We do not agree with 'significance of effect', preferring instead to see 'effect on significance'. We do not agree with Table 22-7. Grade II buildings are nationally important.	The word 'significance' has different particular meanings in the EIA context and the cultural heritage context. The Projects are required by the EIA Regulations to assess the significance of effects on



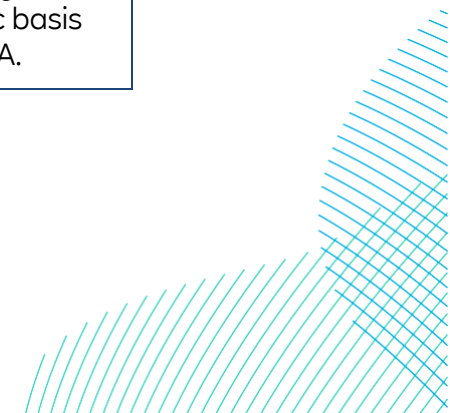
Comment	Project Response
	<p>environmental receptors. The predicted level of effect on the significance of a cultural heritage receptor is reflected in the magnitude of impact specified in the assessment. The level of importance assigned to Grade II Listed Buildings has been revised within the ES chapter.</p>
<p>Table 22-11 Summary of Potential Archaeological remains to date: we do not agree with the Perceived Heritage Importance category. ‘Perceived’ buy who? A local community might consider the heritage asset critical to their place. Because there are no high level research questions in the PEIR document, the assessment of archaeological remains as presented has to be inaccurate, because it /they are not related to any questions. Once you have the research questions you can then reassess the importance and potential against those questions. For example, it might be critically important to understand how the British defensive mentality changed in WW2 from strong points and stop lines to a decision to prevent landings on beaches and thereby not allowing a possible beachhead to be developed. It has been argued that it was only when the Free Polish Forces were based in Britain that their experience of trying and failing to stop Blitzkrieg was reflected in British coastal defensive practice. I would also argue that the Table and perceived Heritage Importance is skewed towards the older assets – merely because they are old, rather than being related to the questions they can answer. This failing is repeated in 22.5.8 onwards and Table 22-12.</p>	<p>The word 'perceived' has been used to imply the very sentiment expressed by Historic England that perception of heritage importance is subjective and that the PEIR assessments were a reflection of the importance assessed using professional judgement within the framework set out in the assessment methodology. Subsequent to the submission of the PEIR, an archaeological Research Agenda has been developed to inform this process of valuation and was approved by the ETG in the Trial Trenching WSI. The Projects will work collaboratively with the ETG to ensure the Agenda is responsive and adaptive to ongoing survey and evaluation work. Assessments of</p>



Comment	Project Response
	heritage importance have been reviewed and amended within the ES where appropriate in the light of emerging information.
22.5.10: Heritage Importance. We are aware that importance and significance are used interchangeably, but this section refers to non-designated assets – therefore assets that are not nationally important. It would be much more useful if this section was about the significance of the non-designated assets.	As set out in the Impact Assessment Methodology (section 22.4.3 of <b>Volume 7, Chapter 22, Onshore Archaeology and Cultural Heritage (application ref: 7.22)</b> significance has been used here, in line with the Principles of Cultural Heritage Assessment, to refer to the heritage values and interests inscribed on heritage assets, while importance has been consistently used to refer to the relative value of identified heritage assets in policy.
22.7.1 Potential effects during construction: We disagree with the terminology as it downplays the seriousness and harm of impacts on setting, which contributes to significance. The division between direct / physical and Indirect / non-physical is not helpful. An impact on setting can be harmful and a direct impact on the significance of the asset. The authors of the text have used standard formats and not really thought deeply about the proposed scheme, its impacts, challenges and opportunities.	The characterisation of effects as direct/indirect and physical/non-physical has been used solely to describe an effect pathway. The assessment criteria in <b>Table 22-8</b> (section 22.4.3 of <b>Volume 7, Chapter 22 Onshore Archaeology and Cultural Heritage (application ref: 7.22)</b> clearly set out, in line with policy, that



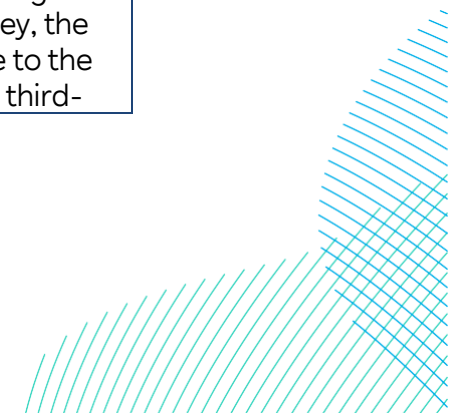
Comment	Project Response
	change to setting or indirect physical change can be as harmful and direct physical disturbance.
22.7.2 Potential effects during operation, para 280: the use of 'effect on heritage significance' is welcome here, but it does stand out because it seems to run counter to the approach used in the rest of the document.	As set out in the Impact Assessment Methodology (section 22.4.3 of <b>Volume 7, Chapter 22 Onshore Archaeology and Cultural Heritage (application ref: 7.22)</b> this approach is consistent with the rest of the assessment, which uses 'significance' in its policy sense to allow the magnitude of any effects on heritage assets to be understood and to allow the policy importance of that asset to be considered in coming to a view on the significance of the effect in EIA terms.
Thank you for consulting Historic England on the PEI stage of your application for the Dogger Bank South Offshore Wind Farm Projects.	Noted with thanks.
We acknowledge that the proposed scheme preliminary design is ongoing and will continue to be influenced by environmental factors to avoid or reduce effects. Therefore, given the additional work to be integrated and explained we would welcome continued discussions with you and respective	We welcome the invitation to engage further and have maintained engagement through the ETG and on an ad-hoc basis through the development of the EIA.



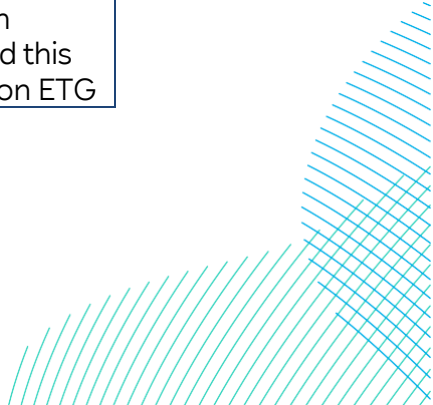
Comment	Project Response
stakeholders to fully understand the schemes assessment of impacts on the historic environment.	
As set out in our detailed advice above, we have made a number of comments and recommendations about various aspects of the project. We would like to see these effectively addressed and we would be pleased to provide further, and continuing, advice in future meetings and in advance of the submission of the ES.	We welcome the invitation to engage further and have maintained engagement through the ETG and on an ad-hoc basis through the development of the EIA.
<b>Section 42 Consultation - Humber Archaeology Partnership July 2023</b>	
Question 1 - Yes / It is an effective producer of the energy we need and is less disruptive to the environment than some other forms of energy infrastructure. It also does not mortgage our future as is the case with nuclear power.	Noted.
Question 11 - Consultation event	
Question 12 - They are too technical for most people. The entire system needs to be simpler, plainer and less bureaucratic. As the system is, it is easy to avoid scrutiny by obscuring issues through sheer repetitive verbiage. The mapping could be improved, clearer, less technical and helping to explain rather than merely illustrative.	The Projects have worked with the ETG to ensure transparency, clarity and consistency to support decision making on the Projects. The clarity of mapping has been reviewed and updated in the ES.



Comment	Project Response
	A specific heritage viewer is being developed to help facilitate information sharing.
<p>Question 13 - These comments relate solely to the onshore archaeology section. The parameters are explained and the methodology for assessment is clearly laid out for a specialist. The section does what it is supposed to do in a PIER report. There are three issues that I have with the section. During the desk-based assessment there is no evidence that the CiTiZAN database was used. This contains information on the archaeology of the coast, especially military remains, that are not necessarily contained in the Humber HER or national heritage databases. This should be consulted. The strategy for prioritising geophysical survey in relation to the more fixed needs of structures at the land fall and substation (start and end of the onshore cable route) makes sense. Unfortunately you have not been able to do this, so that we are already having to consider trial trenching in priority areas where geophysics has yet to be undertaken. It is not good enough to abandon a strategy just because it is difficult to achieve. Access issues are a problem for you to resolve not an excuse not to follow your own strategy and not to do the best for the heritage resource. There is a lot of emphasis on assessing significance against local and regional research priorities but no evidence of how you will do this. The Yorkshire research framework is out of date, does not hardly mention Holderness and was never accepted by Yorkshire's local authority curators because it was inadequate for their purposes and lacked the involvement of the wider archaeology community. Local research</p>	<p>The CiTiZAN database was used but is not directly referenced in the Onshore Chapter or Appendices. RHDHV Onshore and Offshore Archaeology and Cultural Heritage worked together to scope and combine the heritage walkovers for both the onshore and intertidal environments and ensured any relevant CiTiZAN records not on the Humber Historic Environment Record or national datasets were visited and recorded. CiTiZAN is reference in the <b>Volume 7, Chapter 17, Offshore Archaeology and Cultural Heritage (application ref: 7.17)</b>. The Onshore Development Area has been reviewed against all available data including assets recorded on the CiTiZAN database that may interact with the project. With regard to the strategy of geophysical survey, the Projects have had to be responsive to the availability of access to land under third-</p>

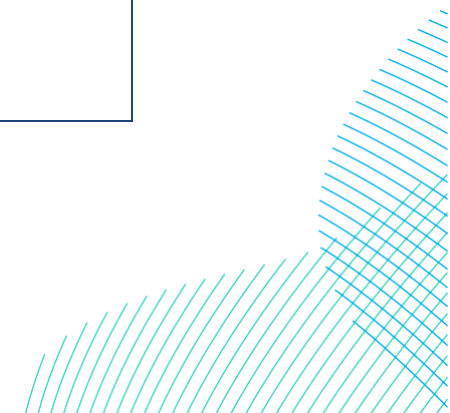


Comment	Project Response
<p>objectives for Holderness can be defined but to do so will need close consultation between Historic England, Humber Archaeology Partnership and the project's archaeologists. The definition of objectives and questions should use the results of previous linear infrastructure projects in Holderness (including Dogger Bank) along with the research framework for the Yorkshire Wolds as their basis. Also, relevant topics from period research frameworks and major research projects such as that on the Roman countryside.</p>	<p>party ownership which is mainly driven by a number of factors including land use, ground conditions and crop cover and is outwith any direct control of the applicant. The Projects and their archaeological contractors AOC Archaeology have done all they can to foster good working relationships with landowners, whilst still prioritising access to areas of permanent infrastructure and potential archaeological pinch points. RWE/RHDHV/AOC Archaeology have kept the ETG updated on the progress of geophysical survey and presented the results at ETG on the 19th of January and 10th of May 2023. The ETG have collaborated with the Projects to devise a suitable strategy for Trial Trenching to enable the Projects to be responsive to the availability of land access and geophysical survey data. The Projects will not be trial trenching areas without geophysical survey data. With regard to research framework, the Projects have refined this based on ETG feedback and based on ETG</p>

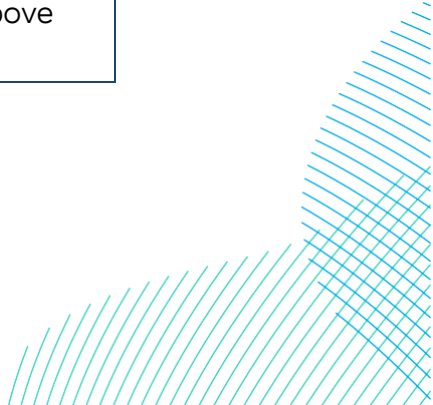




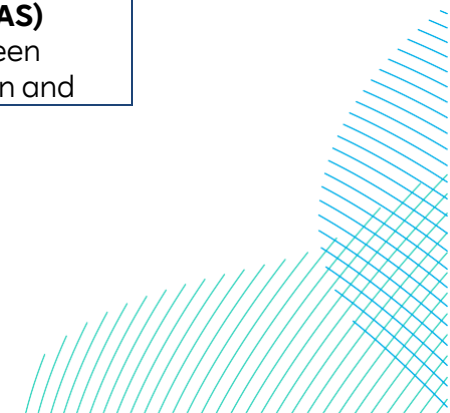
Comment	Project Response
	input have provided an updated Research Agenda within the Trial Trenching WSI. This Research Agenda was approved by the ETG via emails and a meeting on the 1st of August 2023. The Research Agenda will continue to be reviewed and updated as the Projects progress. The Projects are grateful to the ETG for their ongoing guidance and advice.
<b>Historic England and East Riding of Yorkshire Council - ETG 05/12/2023</b>	
<p>ETG5 discussed PEIR consultation responses, the refined Environmental Statement baseline following route refinement and an overview of the first phase of archaeological trial trenching.</p> <p>Agreement was made with HAP that an interim report of the evaluation at landfall and substation which will be submitted to support the ES. The final report, including archaeological finds at landfall, will be submitted post application and through to acceptance.</p>	<p>Noted.</p> <p>The interim archaeological evaluation report is provided in <b>Volume 7, Appendix 22-8 Archaeological Evaluation Report (application ref: 7.22.22.8)</b>.</p>
<p>Does the ETG agree with the approach to the updated assessment for the areas of the onshore development boundary that are outside the previous PEIR development boundary limits.</p>	<p>Noted.</p>



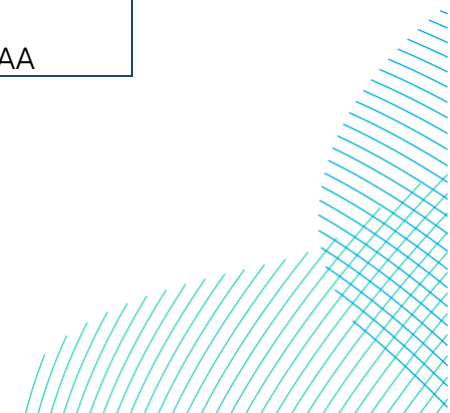
Comment	Project Response
<p>ETG confirmed happy with outlined approach.</p>	
<p>Agreed photomontages were shared from two cultural heritage viewpoints:</p> <ul style="list-style-type: none"> <li>• RHDBS – 2: Heavy Anti-Aircraft Gunsite at Butt Farm – View from eastern side of Scheduled Monument</li> <li>• RHDBS – 6: Beverley Minster Grade I Listed Building</li> </ul> <p>Concern was raised from HAP/HE that the screening could sometimes be used as a catch all solution to preserving the setting of wider views and that the sense of enclosure brought about by the converter station needs careful consideration.</p>	<p>Impacts on the setting of the Butt Farm Heavy Anti-Aircraft Gunsite have been considered with the detailed setting assessment provided in <b>Volume 7, Appendix 22-5 Onshore Infrastructure Setting Assessment (application ref: 7.22.22.5).</b></p> <p>Current photomontages illustrate the worst-case scenario in terms of Onshore Converter Station design.</p> <p>10 year planting photomontages have been produced (<b>Volume 7, Chapter 29 Landscape and Visual Impact (application ref 7.29)</b>). The use of this planting to screen and break up visibility of low-level elements of the development such as switch gear and the proposed access road which area nearest to the asset, leaving the more architecturally coherent larger structures visible above the intervening planting.</p>



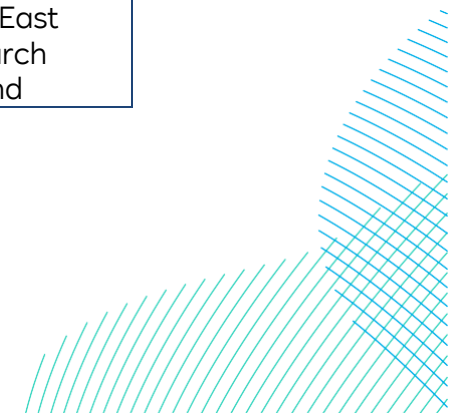
Comment	Project Response
<b>Historic England and East Riding of Yorkshire Council - ETG 19/03/2024</b>	
<p>ETG6 discussed setting issues at the Scheduled Butt Farm Heavy Anti-Aircraft Gunsite, survey updates and feedback on ES chapter and Outline Written Scheme of Investigation.</p>	<p>Noted.</p>
<p>A summary was provided on the feedback from the previous ETG in December 2023 regarding impacts associated non-designed below ground remains in the field and planting affecting the setting of the AA Battery. Further discussions with the Landscape Visual Impact Assessment (LVIA) team was outlined as well as a 10 year planting photomontages.</p> <p>HE queried how the onsite experience is affected by the presence of the Onshore Converter Station.</p> <p>HAP stated that the visualisations show a significant adverse impact despite mitigation.</p> <p>HE stated they would want to see additional benefits proposed to help mitigate the adverse impact.</p>	<p>Impacts on the setting of the Butt Farm Heavy Anti-Aircraft Gunsite have been considered with the detailed setting assessment provided in <b>Volume 7, Appendix 22-5 Onshore Infrastructure Setting Assessment (application ref: 7.22.22.5)</b>.</p> <p>The supplied photomontage illustrates the worst-case scenario in terms of Onshore Converter Station design with no regard to the proposed surface finishes. The Project's further signposts the ETG to the <b>Design and Access Statement (DAS) (application ref: 8.8)</b> which has been submitted with the DCO application and</p>



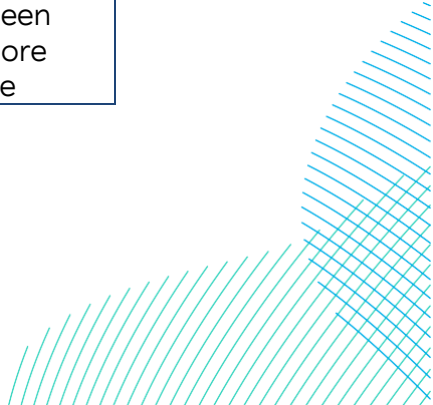
Comment	Project Response
	<p>will set out design principles for the Onshore Converter Station's appearance in terms of built form, materials, and colour. Any surface finishes will be developed through consultation with a Design Panel, in consultation with East Riding of Yorkshire Council. In addition, the Projects would have a Design Champion who would engage with the Design Panel when developing the design going forward. The detailed design of the Onshore Converter Station has been agreed with East Riding of Yorkshire Council as a Requirement of the DCO.</p> <p>For reference, details of the landscaping and planting at the Onshore Converter Station are set out in the Outline Landscape Management Plan (<b>Volume 7, Chapter 29 Landscape and Visual Impact (application ref 7.29)</b>), which is presented as part of the DCO submission.</p> <p>Potential options for providing enhancements at the Butt Farm HAA</p>



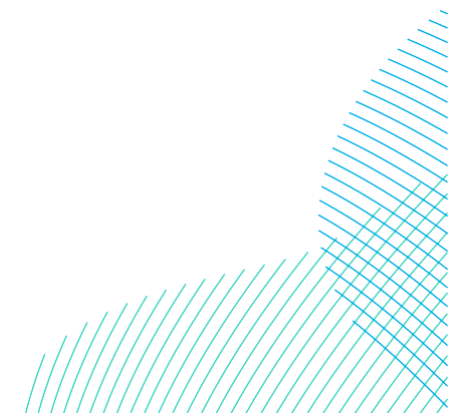
Comment	Project Response
	Gunsite to help offset impacts have been proposed to the ETG.
<p>The Projects' outlined proposed approach to pre-examination trial trenching in 2024.</p> <p>HAP agreed and no other comments from the ETG.</p>	Noted.
<p>The Environmental Statement (ES) and Outline Onshore Written Scheme of Investigation (WSI) were shared with the ETG attendees prior to the ETG.</p> <p>HE commented that the Outline Onshore WSI the aims and objectives section of the OWSI could benefit from some extra text, could be formatted in a way that makes the aims and objectives easier to cross reference with the site-specific WSIs. It utilises the Yorkshire Research Framework and mentions other chronological research frameworks and agendas but does not utilise any, so they should be added.</p> <p>HAP strongly disagreed with the Protocol for Archaeological Discoveries (PAD) and suggested full presence watching briefs unless it can be shown that any archaeology within that zone has been destroyed or will not be impacted during soil stripping.</p>	<p>A high-level research agenda appropriate for the purpose of informing the first phase on intrusive evaluation works was developed and agreed with the ETG in July 2023. This research agenda was linked back to published regional and thematic research agendas with the view to be refined as further information was gathered to allow for a more nuanced and evidenced understanding of archaeological significance.</p> <p>Following ETG feedback this high-level research agenda has been further refined, following the first phase of trial trenching and has drawn upon themes from East Midlands and the North East research frameworks (where appropriate and</p>



Comment	Project Response
	<p>applicable considering significant regional variations).</p> <p>It is noted that the PAD would not supersede or replace any formal archaeological investigation and would stand as an opportunity to engage with the workforce and to allow reporting of remains that were recovered out with archaeological investigation in line with the Project's wider commitment to environmentally responsible development. This has been clarified in the <b>Outline Onshore WSI (Volume 8, application ref. 8.14)</b>.</p> <p>Further to the clarification of the role of the PAD above, it is the Project's view that any archaeological fieldwork must be appropriately targeted on identified archaeological remains or defined areas of archaeological potential in line with research aims agreed on a project level. Archaeological watching brief has been provided for within the Outline Onshore WSI, and like all other works would be</p>



Comment	Project Response
	recommended where the appropriateness of that intervention is determined by an assessment of an area's specific archaeological potential.



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