Historic England

WRITTEN REPRESENTATIONS

ON BEHALF OF THE

HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND

(HISTORIC ENGLAND)

Interested Party Ref No:
20050154

Dogger Bank South Offshore Wind Farm Projects (Reference No. EN010125)

Application by

RWE / MASDAR

1 Introduction

1.1 The Historic Buildings and Monuments Commission for England is generally known as “Historic England”. Historic England is the lead body for the heritage sector and the Government’s principal adviser on the historic environment. We have a duty to promote conservation, public understanding and enjoyment of the historic environment. Historic England is an executive non-departmental public body established by s32 National Heritage Act 1983 and we answer to Parliament through the Secretary of State for Culture, Media and Sport.

1.2 The general duties of Historic England under Section 33 are as follows:

“…so far as is practicable:

(a) to secure the preservation of ancient monuments and historic buildings situated in England;

(b) to promote the preservation and enhancement of the character and appearance of conservation areas situated in England; and

(c) to promote the public’s enjoyment of, and advance their knowledge of, ancient monuments and historic buildings situated in England and their preservation”.

1.3 We also have a role in relation to maritime archaeology under the National Heritage Act 2002 and advise Government in relation to World Heritage Sites and compliance with the 1972 Convention Concerning the Protection of the World Cultural and National Heritage.

1.4 Historic England is a statutory consultee on all Nationally Significant Infrastructure Projects.

1.5 We have been notified by you of the acceptance of the DCO application for the Dogger Bank South Offshore Wind Farm (EN010125) (“the Proposal”) and have registered as an Interested Party. We have been involved in pre-

application discussion with the Applicants, and discussions with the Applicants on a number of topics is ongoing.

1.6 Historic England's interest in this scheme is focused on the designated and non-designated but nationally important heritage assets affected by the Proposal. However, we will be deferring to the advice and recommendations of the Local Planning Authority on all matters concerning Grade II listed buildings and conservation areas.

1.7 The Proposal includes both onshore and offshore components. We have reviewed the assessment of the archaeological and cultural heritage resource identified in the Applicants' Environmental Statements (Offshore: [APP-133]; Onshore: [APP-172]) and the associated WSI documents (Offshore: [APP-246]; Onshore: [APP-239]). We acknowledge the volume of material produced and consider that the documents set out a clear basis for directing effective and functioning work packages in the onshore and offshore realms.

2 Offshore Archaeology and Cultural Heritage

2.1 Our comments in this section are broken down by the application document to which they relate.

7.5 Environmental Statement Chapter 5 – Project Description – Volume 7 [APP-071]

2.2 We note that if the Proposal is awarded development consent that the array area design has been refined since the PEIR consultation. However, the Proposal's principal infrastructure retains a combined number of between 113 and 200 turbines (57-100 each). With the Dogger Bank South (DBS) West and DBS East Array Areas situated at a minimum of 100km and 122km from shore respectively.

2.3 In terms of refinements, we specifically note that the range of Offshore platforms will no longer include Offshore Substation Platforms (OSPs) - reducing the maximum platform number from eleven to eight following the removal of HVAC technology. The need for four HVDC transmission cables for both projects, and clarification that Landfall works seaward of Mean Low Water

Springs (MLWS) include a long trenchless crossing - reduced to 1km Export Cable Corridor is 1km wide but funnels out to up to approximately 3km on approach to the landfall and the crossing of the existing Langled pipeline, and approximately 15km on the approach to the DBS West Array Area is also explained. With gravity base and suction bucket foundations options removed for all turbines and platforms located within the array areas.

2.4 We consider that despite the overall scale of the Proposal offshore, such refinements to the maximum seabed impact should enable the developer to incorporate micrositing options to accommodate any unforeseen events. For example, if a previously unknown marine archaeological site was discovered and which would be preferable to leave in situ, micrositing may allow an impact on the site to be avoided (National Policy Statement EN-3, para. 3.8.89 (DESNZ, November 2023)).

2.5 Additionally, in accordance with these changes, paragraph 5.1.1 states that five separate Deemed Marine Licences are included as schedules to the DCO to cover offshore infrastructure elements (for which we have related comments on below, see paragraphs 21.3 and 2.14).

7.17 Environmental Statement Chapter 17 – Offshore Archaeology and Cultural Heritage - Volume 7 [APP-133]

2.6 17.3.2 states that the realistic worst-case scenario for marine archaeology is based upon the general assumption that the greatest potential footprint for the projects has the greatest potential for direct impacts (e.g. damage / destruction) to surviving archaeological material. This approach has been adopted by the Applicants because details of the final design of the Proposal cannot be fully realised at this stage. We note that the National Policy Statement EN-3 (paragraph 3.8.87 (DESNZ, November 2023)) acknowledges that specific construction designs are unlikely to be known at the time of the application to the Secretary of State. We understand that as design and innovation in the offshore wind sector is an active area of research and development, it affords flexibility to utilise innovative technology closer to construction. Therefore, we accept the Applicants' use of the realistic worse-case scenario approach.

2.7 We also consider that this flexibility is similarly applicable to incorporating methods of archaeological data gathering to address development impacts, implementing mitigation and focussing research approaches. For example, the development of scientific methods and potential sector specific guidance and curatorial advice may advance in this time also. Therefore, opportunities should be taken by the project to test potentially recent or even new underwater evaluation techniques, at the point of producing individual scheme method statements (associated to the project WSI). Statements should emphasise producing knowledge and understanding – based on quality academic input, innovation, and a systematic and sophisticated research designs. As a result, we consider the ES would benefit from including such a commitment, as a positive contribution to the historic environment (Overarching Planning Statement for Energy EN-1 (November 2023) ("NPS EN-1") para. 5.9.13). The commitment itself could be directed by the Outline Written Scheme of Investigation (Offshore) - Volume 8 [APP-246], whereby incorporating provisions for individual scheme method statements to be carried out in accordance with the latest guidance and advice, and to take advantage of advances in new methods of investigation.

2.8 A repeated statement is included (in paragraphs 218, 238, 241, 290 and 318) which suggests that development impacts to the historic environment that is hitherto unknown/unrecorded can be managed in a generic way. While acknowledging that the precise nature of the impact cannot be fully understood until the impact has occurred, the document indicates that investigation, recording and offsetting will allow the effects to be non-significant in EIA terms. However, our view is that should an impact occur (either direct or indirect) the anticipated changes are unlikely to be a negligible magnitude and minor adverse significance (in EIA terms). As the harm is irreversible, and offsetting is only fully possible prior to an impact occurring, there is potential for a greater degree of harm to unknown heritage assets than has been suggested here.

2.9 Furthermore, within Table 17-25 'Summary of Potential Likely Significant Effects on Offshore Archaeology and Cultural Heritage' it presently seems not possible for the Applicants in broader terms to conclude that no significant adverse residual effects will result from the impacts identified. As high-resolution survey work has not been completed for areas of the seabed planned to be disturbed by construction activities and there is likely to be long

term reduced access to geoarchaeological and paleoenvironmental deposits of heritage interest, we consider there is a potential for a greater degree of harm than has been suggested.

2.10 As a final point, throughout the document – and the outline WSI - the term “preservation by record” is used. This as a phrase in relation to the historic environment is no longer in use within planning policy in England and is misleading given the comments made above. The phrase is no longer in use due to the nature of the destructive process of potential interactions with archaeological material and also the process of archaeological excavation, and that any such practical work should look to balance the need for recording strategies with interpretation (relevant to up to date research questions).

8.22 Outline Written Scheme of Investigation (Offshore) - Volume 8. [APP-246]

2.11 It is apparent Artificial Nesting Structures (ANS) for Kittiwake [APP-052] are to be included as part of the Application – as referenced in the recently submitted document ‘10.19 Project-Level Kittiwake Artificial Nesting Structure (ANS) Site Selection Report (Revision’01)’ [PDB-007, with a separate marine licence application sought for the determined location of such structures. As a result, we request would appreciate being consulted in the planning of possible locations at the earliest opportunity prior to a marine licence application being submitted.

2.12 Furthermore, due to the Landfall Works HDD options (included within 7.5 Environmental Statement Chapter 5 – Project Description – Volume 7[APP-071]), the WSI should consider coordinating survey and investigation measures to address possible impacts to the remains for towns lost along the Holderness Coast due to sustained coastal erosion. Especially if nearshore access for survey vessels may not be able to utilise techniques conducive to the recording of objects on the seabed that may relate to this potential. Therefore, as the final designs are confirmed discussion with local experts and your marine archaeological contractor, the local authority and Historic England will be important in addressing such potential.

3.1 Draft Development Consent Order - Volume 3. Reference: [APP-027]

2.13 Within the following sections:

- Schedule 10, Part 2, 15.-(1) (e) – page 124
- Schedule 11, Part 2, 15.-(1) (e) – page 147
- Schedule 12, Part 2, 15.-(1) (e) – page 172
- Schedule 13, Part 2, 13.-(1) (e) – page 198
- Schedule 14, Part 2, 11.-(1) (e) – page 219

We request that the wording of the following condition is amended, from:

“an archaeological written scheme of investigation in relation to the offshore Order limits seaward of MHWS, which must accord with the outline written scheme of investigation (offshore) and industry good practice, in consultation with the statutory historic body to include—”

to:

“A written scheme of archaeological investigation in relation to the offshore Order limits seaward of mean high water, which must be submitted to the statutory historic body at least six months prior to commencement of the licensed activities and to the MMO at least four months prior to commencement of the licensed activities and which must accord with the outline marine archaeological written scheme of investigation and industry good practice, in consultation with the statutory historic body to include—”

Given a similar worded condition (as to the one we have above requested) has included a time scale for the delivery of an offshore WSI in the deemed marine licence conditions of all other offshore wind projects, the reason from departing from this unclear.

2.14 Furthermore, Schedules 12, 13, 14, 15 and 16 require Part 1 condition 1(4) to be amended to include Historic England York office address (as used in Schedules 10 and 11): Historic England, 37 Tanner Row, York, YO1 6WP.

3 Onshore Archaeology and Cultural Heritage

3.1 We consider that the approaches identified in the WSI [APP-239] are correctly identified as 'Outline' and need the addition of considerable detail in order to assemble and deliver a coherent (and appropriate) archaeological strategy. There are elements needing greater clarification, particularly public outreach and community engagement. This is discussed in section six below and the Appendix: Example of an Opportunity for Broader Public Engagement below, but we remain in active discussion with the Applicants and their consultants concerning the additional archaeological survey and evaluation. These additional works would deliver a more comprehensive scale and understanding of significance and better reveal the impact of the Proposal on significance, as required by NPS EN-1 (para 5.9.17). We have referred to the need for specific discussions concerning public benefit in our answer to the ExA's questions of 10th January 2025, Question ISH 2.10.14

3.2 It is also the case that, in common with Environmental Statements associated with infrastructure projects, the stress is on identifying the impact of the Proposal on individual 'sites', and chronology; there is little or no assessment of 'landscape', or the landscape scale of the intervention. This aspect of the Proposal is further examined at 3.4.2 - 3.4.3 and Appendix: Example of an Opportunity for Broader Public Engagement below.

3.3 The proposed archaeological response is, as it should be, aligned with compliance demands, but the outcome is an approach which is lacking in creativity, and any meaningful public benefit. Public benefit is a key outcome identified in NPS EN 1 para 5.9.25. This point is further examined below.

3.4 We would also make the following points in relation to the Applicants' archaeological strategy.

3.4.1 The archaeological strategy is at an early stage. An interim report has been produced by AOC (AOC May 2024, [AS-023], [AS-024] and [AS-025]) providing a summary of the Phase 1 evaluation work at the landfall and converter station sites. Historic England have provided comment back to the Applicants, covering points of detail for correction, but have also identified the need for a strategic approach in order to deliver greater public benefit. The

report is an ‘interim’ and therefore we expect to see a more thorough, considered reporting product with recommendations in due course. We are currently working with the Applicants and local authority to agree successive phases of the archaeological strategy.

3.4.2 The historical values associated with the landscape, and the significance of the current project, can be better understood and demonstrated by the Applicants and their agents ‘positioning’ the Proposal in a greater historic context. The landscape from South and West Yorkshire, eastwards along the southern portion of North Yorkshire and into the southern portion of the East Riding, and along the Humber to terminate at the Yorkshire coast has become a landscape of ‘power generation’ since the 1950s, and thus there is a question both of the impact of the current Proposal, and the manner in which it fits into this bigger picture of energy production. Positioning the current Proposal in this greater continuum would complete the assessment but would also have a practical outcome. The greater understanding of the site as one in a series of power generation sites would allow the Applicants to see how the landscape around the coal-fired power stations was created to diminish their visual impact and this could produce better landscape design solutions for the current converter station area.

3.4.3 The landscape context can also be better met by the Applicants and archaeological contractors developing a bigger, holistic archaeological vision. This can be illustrated by reference to the assessment of the Mesolithic material identified in the landfall site Phase 1 evaluation. Although this material was ephemeral, it is significant. It has greater significance, however, when seen in association with the research work being conducted at Skipsea, East Yorkshire by the University of York, but also when associated with the submerged landscape in the North Sea where there is an extensive Mesolithic landscape, and the Mesolithic material is plentiful. This shift in focus; looking at the terrestrial and marine evidence together would be an innovative approach as the cultural heritage of the terrestrial and marine realms are traditionally treated as separate entities. Considering the marine and terrestrial components together would further establish the significance of both the marine and terrestrial archaeological material. However, as stated above, the Phase 1 evaluation report is an ‘interim’ report, and the final report

is likely to be more substantive. In our answers to the ExA's questions of 10th January 2025, we stated in response to Question ISH 2.10.14 that, although there have been no cross-project forums or meetings to pursue the public benefit matters, it may be the case that a more holistic approach to an understanding of the archaeological material can be discussed and formulated.

4 Setting of Onshore Assets and its Contribution to Significance

4.1 Numerous Scheduled Monuments, Listed Buildings, Conservation Areas and one Registered Park and Garden lie within the areas of search.

4.2 The principal built element of the scheme is an Onshore Converter Station (OCS).

4.3 The impact of a proposal on the setting and significance of heritage sites is a major consideration of NPS EN-1. (5.9.3; 5.9.10; 5.9.12; 5.9.22; 5.9.25; 5.9.28; 5.9.36) This is coupled with the need to ensure that good design is achieved, and landscape treatments deliver both environmental and biodiversity gains, do not detract from significance and deliver public benefit (NPS EN-1 paras 4.1.5; 4.6; 4.6.1; 4.6.13).

4.4 The information currently submitted with regard to the proposed built elements of the scheme is limited, and far from clear, and has now been supplemented by a Project Change Request for both Offshore and Onshore elements of the scheme (RWE notification to Historic England of 15th November, 2024, including [PDA-012] for Offshore and [AS-015] for Onshore elements).

4.5 The Project Change Request proposes the reduction in size of the footprint of the proposed OCS, previously depicted as a visualisation ([APP-192] for Landscape and Visual text, para 23.6.2.3.1 onwards, and [APP-193] Fig 23-15a2; [APP-193] Fig 23-15a3). These visualisations presented a 'worst case scenario' (two Onshore Converter Stations within the Converter Station Area) and indicated the scale and massing of one possible product of the scheme, as seen from the nationally important Scheduled Monument of 'Heavy Anti-aircraft Gunsite, 350m west of Butt Farm', NHLE 1019186 (the "Butt Farm Gunsite").

4.6 The significance of the Butt Farm Gunsite is derived from several values. It has evidential value by virtue of its buried archaeological and standing building archaeological potential. It has historical value in that it is associated with a major international conflagration and is one in a chain of defences around Hull. It has aesthetic value because it invokes awe, and its place in the open landscape is easy to comprehend. It has communal value because it is a visited heritage site, it has a cadre of dedicated enthusiasts who research it and care for it, and it has a connection to people in the locality whose relatives were stationed on the site.

4.7 The extent, massing, scale of the proposed OCS structure and its proximity to the Scheduled Monument represented a considerable concern for Historic England. We considered that the proposed Converter Station(s) represented ‘less than substantial harm’ to the significance of the site, but at the high end of this scale, owing to the manner in which the experience of being on the scheduled site would be diminished by the over-bearing presence and scale of the Converter Station(s). The proposed Converter Station(s) would significantly reduce the open quality of the landscape setting of the scheduled monument, and hinder understanding of its wartime use.

4.8 Following the change request, it is now proposed that the footprint of the OCS is to be reduced in scale. We note and welcome the reduction in the size of the footprint and agree that the proposed reduction in scale of the OCS will lead to a reduced potential for effects on buried archaeology and a reduced visual impact when seen from the Butt Farm Gunsite. However, we consider that the harm to the significance of the designated site will remain at 'major adverse', and not 'minor adverse' as suggested by the Applicants. This high degree of ‘harm’ needs to be addressed. This can be achieved by reducing the impact of the building, or finding ways to mitigate the harm it would cause. We do not consider that screening through planting is an effective or lasting mitigation measure in this instance and have referred to this in our response to the ExA’s questions of 10th January 2025 (Question ISH 2.10.12).

4.9 It is clear from the supporting text in the Environmental Statement ([APP-192], para 91, page 69) and the Project Change Request that the design component of the OCS is a work in progress. The Project Change proposals have not been confirmed, whilst [APP-192], para 93, page 69 states that the Environmental

Statement visualisation does ‘not show details of finishes or colours…’. The Applicants have yet to provide a visualisation of the Converter Station at night showing the impact of any service or security lighting.

4.10 Therefore, it is not yet possible to understand the full impact of the built element of the scheme on the setting and significance of the scheduled Butt Farm Gunsite. To address this aspect of the proposed development the maximum height, footprint, landscaping scheme and precise location of the Converter Station is to be fixed at DCO stage. If DCO is granted the final details will need to be carefully assessed as part of any post-consent determination.

4.11 Historic England accepts the analysis presented by the Applicants that the OCS cannot be placed in a location other than that proposed (DBS Design and Access Statement, LUC, vol 8, June 2024, document number 005028829-01, [APP-233]). The focus therefore should then switch to identify ways in which the visual impact of the structure can be diminished, and other mitigation measures discovered and proposed, in line with the guidance in NPS EN-1 para 4.7. However, it should be noted that the Design and Access Statement makes no reference to the impact of the proposed Converter Station on the nationally important Butt Farm Gunsite.

4.12 The Applicants should continue the analysis of exactly what structures are required on the converter station site. Should it prove to be the case that the smaller footprint structure is confirmed, effort should then be directed into micrositing exercises in order to locate the structure in the most suitable location within the area and thereby reduce the visual impact of the structure on the setting of (and thus the significance of) the Butt Farm Gunsite.

4.13 The materials, colour palette, lighting scheme and planting measures need to be carefully examined, and any final draft strategy should be checked by one or more experienced landscape architects, in addition to the local authority landscape and conservation specialists. NPS EN-1, para 4.7.5 provides guidance on this. An automatic selection of planting as ‘screening’ is to be resisted; it may be the case that more ‘naturalistic’ planting or ‘estate landscape’ planting might be more beneficial. Every effort should be taken to identify the most climate resilient species for planting to ensure long-term survival. Similarly if the worst case scenario for the converter station is not

brought forward, the freeing up of land around the structure which is selected, should allow for the introduction of horizontal banding in the landscape, in the manner used by Sylvia Crowe and Brenda Colvin to great effect when they provided the landscape approach used to diminish the visual impact of the coal fired power stations, and nuclear power plants in the 1950s and 1960s.

4.14 The approach to finding sustainable design solutions should follow the directions provided by NPS EN-1, paras 3.5.2; 3.7.61; 5.10.27.

5 Assessment Methodology for Onshore Cultural Heritage

We disagree with elements of the Assessment Methodology identified in Table 22-7 [APP-172] and used throughout the Environmental Statement. Buildings listed at Grade II are nationally important, not 'Medium' importance. We agree with the 'Definition of magnitude of impact to heritage assets' (Table 22-8), but because the importance of Grade II buildings has been downgraded, the magnitude of impact and the significance of impact will be distorted accordingly.

5.1 The assessment of the magnitude of impact on the significance of Grade II listed buildings needs to be carefully reviewed by the cultural and heritage consultants in order to ensure that the misidentification of the Grade II sites (as regionally important) has not resulted in an underestimation of the impact of the proposed works on their significance.

6 Cumulative Impact and Public Benefit:

6.1 There are now several green energy infrastructure projects following a similar route from the Yorkshire coast to end points either between Hull and Beverley, East Riding of Yorkshire, or at Drax, North Yorkshire.

6.2 In order to demonstrate a greater understanding of historical value and significance, the Environmental Statement should provide more thorough assessment of the cumulative impact of this and other related energy proposals (see [APP-192], para 159, page 93 for a reference to the several other consented and proposed green infrastructure projects in the area).

6.3 Similarly, we would wish to see positive and explicit statements in the Environmental Statement about the sharing of knowledge between the several infrastructure projects following the same route from the Yorkshire coast.

6.4 However, we consider that the suggested public outreach and community engagement recommendations ([APP-239 section 9) represent a considerable missed opportunity to deliver the full potential of and for public benefit. The numerous interventions in the offshore and onshore spheres should be thought of as a once in a generation opportunity to generate understanding of the cultural heritage and engagement in it and with it for many years. We would wish to see a greater, more holistic approach to the ways in which public benefit could be generated across the entire project, both onshore and offshore, rather than thinking of the two domains as completely distinct, with two different public outreach and community engagement aims. Greater understanding of significance leading to more developed and extensive public benefit is a key aim of NPS EN-1, paras 5.9.17 and 5.9.25.

6.5 The suggested proposals for public benefit and engagement as it relates to the offshore part of the scheme are identified at [APP-246], paras 187 – 190. We consider that the suggested approach is limited and provided examples on page seven of our relevant representation [RR-022] of opportunities to broaden public engagement and benefit. A further example in relation to the Butt Farm Gunsite is provided as an appendix below. We remain willing to assist the Applicants in the formulation of an appropriate outreach and engagement scheme befitting the scale of the project and have referred to this in our answer to the ExA's questions of 10th January 2025, question ISH 2.10.14.

Historic England considers that the historic environment has generally been addressed appropriately in this application. We have identified where harm will be caused to the historic environment, and the ExA will need to balance this harm against the public benefits of the Project (and other relevant issues) in coming to its decision.

7.0 Summary

7.1 We consider that the outstanding onshore issues (definition and location of the Converter Station, landscaping, archaeological strategy and public benefit opportunities) can be resolved through discussion between ourselves, the Applicants and the local authority, and those solutions will help deliver an effective and creative exemplar for large scale green energy proposals.

In the Offshore realm, we recognise that the offshore design plan is being further refined by the applicant, the aim of which further work is to reduce the maximum area disturbed by construction activities. We consider that, through the iterative seabed survey and investigation stages - with coordinated input from the retained marine archaeologist and advice sought from Historic England - the Proposals will be in a strong position to microsite around known heritage assets and reduce the prospect of irreversible impacts to unknown features of the historic environment - should consent be granted.

Appendix: Example of an Opportunity for Broader Public Engagement

The majority of the Butt Farm Gunsite Scheduled Monument is in need of conservation work. Thus far only the command building and one gun site have been conserved, whilst one gun site is still partially buried by modern material. This should not be understood as a simple and limited phase of conservation work but could be elevated by its inclusion in a heritage craft skills programme. The conservation of modern brick and concrete is a niche area of expertise and would benefit from a craft skills approach.

Large areas of the gun site are not understood. The focus has been on the gun site itself, but the areas beyond the gun site where the accommodation and rest areas were located have been ignored. These aspects of the site and the women's quarters would benefit from geophysical survey, evaluation and research, all of which could be undertaken by community volunteers.

The research could have many elements to engage numerous interests and communities. Many World War Two buildings were dismantled and re-used; it would

therefore be beneficial to know where any such buildings at Butt Farm might have been moved to, and whether they still exist.

The area between Hull and Beverley, Hull and the north bank of the Humber is a landscape of defence, including the bomb-damaged cinema on Beverley Road, Hull, several anti-aircraft guns sites, the Hull decoy docks and Paull Fort, all of which are designated as nationally important. The major change in the setting of the Butt Farm site could be taken as an opportunity to generate an understanding of these sites and this landscape through a community heritage project, and this could include a greater awareness of the World War Two material identified in the marine zone.
An holistic approach between marine and terrestrial archaeology: this would be a hugely innovative approach with many and considerable engagement opportunities for arts, literature, culture and a wide range of communities.

The DBS project itself: a good model to follow is that of the National Highways A63 work in Hull. This project had the most popular and successful web site of any National Highways project on account of the archaeology uncovered in the scheme. Although there is no burial site (that we know of) on the route of the service connection, the variety of the archaeology and the linkages with the submerged Doggerland offer considerable opportunities for work with schools and colleges. There are STEM opportunities, object of the week, Meet the Archaeologist, all of which proved hugely successful.