

From: [Allen, Tim](#)
To: [Outer Dowsing Offshore Wind](#)
Subject: Outer Dowsing Offshore Wind - Historic England Submission Deadline 2 ExAQ1
Date: 27 November 2024 21:42:18

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Dear Pins

Our response to ExAQ1 as follows:-

HISTORIC ENGLAND ADVICE

Q1 HE 1.4 LCC HE Further Archaeological Surveys/Works

Further to the comments from LCC [RR-004] relating to the lack of evaluation at all levels (including aerial photographs, geophysical survey and trial trenching), can LCC and HE comment on:

- **the Applicant's response to Relevant Representations – including details of geoarchaeological works [PD1-071, Section RR-027.006];**
- **the Onshore Archaeological Geophysical Report [PD1-080]; and**
- **updated Requirement 17 of the draft Development Consent Order (dDCO) [AS1-024]**

There remain areas of the scheme where as yet geophysical survey and trial trenching etc have not effectively characterised archaeological significance. This lack of understanding of what lies beneath the ground in parts of the scheme presents thus far unmanaged risk; both in terms of timely project delivery and appropriate management of archaeological impacts (through informed design and mitigation). Whilst there can never be a complete understanding of what may be encountered the earlier and more fully techniques are deployed the more effectively risk can be controlled.

There are areas where geophysical survey is less effective due to soils and ground condition, these areas may require more detailed geoarchaeological modelling to target trench evaluation for instance to islands and shores and margins of ancient dryland. In general, archaeological investigatory techniques should be deployed in a complementary and iterative manner where one addresses the outputs or limitations of another.

The latest updated text for Requirement 17 Archaeology is document library references PD1-024, PD1-025, PD1-026, which we understand supersedes AS1-024 this DCO text addresses the need for the results of necessary further archaeological evaluation work (reporting post-DCO) to sit alongside the submitted *outline onshore written scheme of investigation for archaeological works* to inform

the specification of archaeological mitigation works.

Given that as discussed above further archaeological evaluation work remains to be done the amended version (submitted Sept 2024) of Requirement 17 as set out in PD1-024, PD1-025, PD1-026 is necessary in place of that in document ref AS1-024 (submitted July 2024). It is this Sept 2024 revision of Requirement 17 that the applicant refers to in [PD1-071, Section RR-027.006] where they commit to further pre-construction archaeological works that will inform the WSI (s) (for mitigation).

In the Draft statement of common ground [REP1-027] between HE and the Applicant at para 2.1 item HE1 please read references 'PD1-024, PD1-025, PD1-026' in place of 'PD-023, PD-024, PD-025'.

We continue to refer you to the expertise of Lincolnshire County Council's archaeological specialists as regards to archaeological matters.

Q1 HE 1.5 LCC HE Updated Onshore Outline Written Scheme of Investigation (OWSI) for Archaeological Works

Are you satisfied that the updated OWSI [PD1-052] provides sufficient detail on:

- preservation in situ and enforceable measures?**
- determining the significance of archaeology which may be affected?**
- contributing to knowledge and understanding, public benefit and public dissemination of information? Are you satisfied that it provides sufficient protection for unknown heritage/archaeological assets with appropriate mitigation in place to preserve such assets?**

In the draft statement of common ground between Historic England and the Applicant [REP1-027] we have marked item HE4 as agreed that "*The measures identified in the Outline Onshore Written Scheme of Investigation for Archaeological Works (PD1-052) are adequate to mitigate potential significant effects identified in Chapter 20: Onshore Archaeology and Cultural Heritage (AS1-048).*"

The OWSI [PD1-052] and Schedule of Mitigation as updated September 2024 ref PD1-058 and PD1-059 include an 'archaeological clerk of works' a position which provides some reassurance as to the robustness of measures for preservation in situ through there being a responsible qualified and experienced person on site. Enforceability of measures for preservation in situ rest upon the final detailing and supervision and control of archaeological works, and on clarity that if preservation

proves impossible then full excavation and recording must be deployed. Given that the detail of measures for the assets to be preserved thereby are not yet available and their successful delivery cannot be guaranteed in the case of assets as yet unlocated, the assurance of preservation is we believe reliant upon the control of discharge of requirement 17 for Written Schemes of Investigation.

The applicant could address the enforceability of preservation in situ and the robustness of selection through a revision to the OWSI and Schedule of Mitigation to make clear that submitted WSI's for archaeological mitigation shall include:-

1. detailing of the methodology applied to the selection of assets for preservation,
2. a narrative of dialogue between the Archaeological Clerk of Works, the LCC archaeological advisor and Historic England, and
3. the specific and detailed measures to be deployed in respect of each asset identified for preservation.

Q1 HE 1.6 LCC HE Middlecott Almshouses

In light of [RR-084] Anthony Kindred and [RR-085] Lisa Kindred and the Applicant's response to Relevant Representations [PD1-071], clarify, with reasons, whether you consider the Applicant's conclusions in relation to the impact of vibration, noise and dust upon Middlecott Almshouses to be satisfactory.

The conservative limits to vibration levels set out by the applicant at PD1-071 in relation to Middlecott Almshouse are noted, as with noise and dust this would to be demonstrably effective require a mechanism for monitoring and control further to the submitted [APP-269] Outline Noise and Vibration Management Plan. LCC as the Highway Authority will be better placed to comment on that document and the likely deliverability of the limit for vibration set out at PD1-071, and whether a vibration monitoring procedure for access routes passing relevant vibration sensitive receptors (VSRs) should also be included within the final NVMP.

Yours faithfully

Tim Allen (for Historic England)

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