



Susan Hunt  
Lead Member of the Panel of Examining Inspectors –  
Morgan Offshore Wind Farm Generation Assets  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol BS1 6PN

11<sup>th</sup> November 2024

Dear Ms Hunt,

**Application by Morgan Offshore Wind Limited for an Order Granting  
Development Consent for the Morgan Offshore Wind Farm Generation Assets  
PINs Ref: EN010136**

**The Examining Authority's Written Questions and requests for information**

**Historic England registration identification number: 20049461**

We offer this response to the First Written Questions issued on 29<sup>th</sup> October 2024 by the Examination Authority [Ref: PD-004] in accordance with Deadline 3 (12<sup>th</sup> November 2024) for the examination of the proposed Morgan Offshore Wind Farm Generation Assets project (as referenced above). We have directed our attention at the questions directed to Historic England and the historic environment (marine archaeology and terrestrial heritage assets).

ExQ1 Ref	Question	Historic England response
HE 1.1	<u>Dimensional Parameters for Archaeological Exclusion Zones</u> Historic England is asked to confirm whether the dimensional parameters for Archaeological Exclusion Zones proposed in the Outline Written Scheme of Investigation (WSI) [APP-069] are acceptable.	We accept the precautionary approach adopted by the Applicant regarding use of a Temporary Archaeological Exclusion Zone (TEAZ) as described in paragraph 1.4.3.15 (aviation archaeology). We also accept the explanation for AEZ selection for anomalies of high and medium potential (Table 1.6 and Figure 1.6) and that the spatial extent to AEZs can be adjusted (as described paragraph 1.6.2.6).



HE 1.2	<p><u>Assessment of Residual Risk of Harm to Archaeology</u></p> <p>In paragraph 4.11 Historic England's WR [REP1-046] HE does not agree the conclusion of no significant effects after mitigation in the ES [APP-026], on the basis that the assessment does not accurately reflect the residual risk of harm to archaeological assets despite embedded mitigation proposed. Historic England is asked to comment further on whether it is satisfied with the response given by the Applicant at section 2.4 [REP2-005] and if not, what it would need to be satisfied that effects after mitigation would not be significant in EIA terms.</p>	<p>We accept that the Applicant (Ref: REP1-045.27) has identified mitigation measures that focus on avoidance. However, it is important to highlight differences between 'mitigation' and 'offsetting' in reference to the proposed Maximum Design Scenarios (MDSs). We therefore accept the response provided by the Applicant regarding avoidance where possible of presently known elements of the historic environment (as mitigation). We also acknowledge that effective implementation of an agreed WSI to inform pre-construction investigation surveys should also enable AEZs to be identified and for micro-siting of Morgan Generation infrastructure. However, in situations where avoidance is deemed impossible, only offsetting measures are possible. Therefore, for offsetting measures to be effective (i.e. reduce residual risk in EIA terms) requires the consent conditions proposed by the Applicant as set out in the draft DCO e.g. Schedule 3, paragraph 20(2) (REP2-011 &amp; 012).</p>
HE 1.3	<p><u>Revised Mitigation and Means of Securing the Commitments</u></p> <p>Please review and confirm your acceptance or otherwise of the amended mitigation and means of securing the commitments in the revised Mitigation and Monitoring Plan [REP2-016 with tracked changes].</p>	<p>In Section 1.9 (Marine archaeology and cultural heritage) line reference 8.11, we accept the additional text in the column "description of mitigation of monitoring measure" albeit that this text should come first (i.e. prior to describing WSI &amp; PAD). In the column "Means of securing the commitment", the additional text should be amended to make it clear that "...subsequent method statements are produced by the Retained Archaeologist in consultation with the Statutory Archaeological Curator in advance of all survey works commencing."</p>
HE 1.5	<p><u>Improvements to the Outline Offshore WSI</u></p> <p>In section 7 of Historic England's WR [REP1-046] HE makes a number of requests for editing and improvement of the outline offshore WSI for archaeology, particularly regarding survey methodology. To capture your responses to Historic England's WR, the ExA requests that you produce an amended outline WSI by Deadline 4 to enable further review by Historic England and to assist the final SoCG at Deadline 6.</p>	<p>We appreciate that this question is directed to the Applicant and the attention given by the ExA to the matters raised in our WR. We will review and provide comment on any amended outline WSI as should be submitted at Deadline 4.</p>



HE 1.7	<p><u>Micrositing Allowance Related to Archaeological Mitigation</u> Review with Historic England and report on any consequential effects to archaeological impact mitigation of changing the micrositing allowance in response to MCA's SAR requirements from 125m to the 50m dimension preceded in previous made orders for OWFs, and update the Layout principles 5 and 6 accordingly.</p>	We appreciate that this question is directed to the Applicant and we will provide further advice to the Applicant and the ExA should that be necessary.
HE 1.11	<p><u>World Heritage Sites</u> The ExA notes from Historic England's WR [REP1-046] that it is "prepared to agree with the assessment presented that effects during construction, operations and maintenance, and decommissioning of the Morgan Generation project on the assessed designated historic assets within the English study area are not significant in EIA terms" (para 4.9) and that it has "no further comment or other advice to offer regarding the conclusions drawn by the Applicant, as relevant to any cumulative impact on the setting of heritage assets in the English coastal zone" (para 6.3).</p> <p>However, no specific comments are made by Historic England or Natural England regarding the Applicant's assessment of World Heritage Sites (WHS), of which both Hadrian's Wall and the English Lake District were scoped out of assessment for the reasons given in Appendix B of the Cultural Heritage Assessment [APP-062].</p> <p>Nonetheless, the Seascape Landscape and Visual Impact Assessment (SLVIA) includes at Annex 10.5 [APP-038] an assessment of effects of the Proposed Development on the English Lake District WHS, and there are a number of viewpoints taken from within the WHS (Figures A.1 to A.3 [APP-038] and Annex 10.6 [[APP-039, 40, 41, 42, 43 and APP-044]]).</p> <p>Historic England and Natural England are asked:</p> <p>i) Whether they agree with the Applicant's reasons for scoping the WHS out of the Heritage Impact Assessment.</p>	<p>In reference to the Applicants' scoping out potential impacts on the two World Heritage Sites (WHS):</p> <ul style="list-style-type: none"> <li>• Frontiers of the Roman Empire: Hadrian's Wall; and</li> <li>• the English Lake District</li> </ul> <p>Regarding Hadrian's Wall WHS, the development is a very considerable distance away from the component parts of the WHS, all of which are coastal installations beyond the western end of the Wall and down the Cumbrian coast. The idea that these installations will have had a generalised watching brief over the sea to their west is sound, and therefore the observable presence of the sea is critical to the contribution that setting makes to their significance (an ability to understand Roman military planning and land use) and the significance of the WHS. However, given the distance that the nearest component of the proposed array area lies from the WHS, we don't envisage that this ability will be impacted in any meaningful way and therefore there is very little risk of this proposed project impacting on the significance of the Hadrian's Wall WHS.</p> <p>Regarding the English Lake District, it is important to consider the landscape scale of the WHS, and whilst the relationship with the sea is not so clearly a part of its significance, the harmonious beauty of the interaction between the natural landscape and human agro-pastoral system is critical. The scale of the WHS, and this emphasis on harmonious beauty, means that it is reasonable to consider impacts from out to sea, including the proposed Morgan Generation project and its anticipated distance offshore. However, it is likely that the conclusion could be reached that</p>



	ii) Provide comment on the above-mentioned SLVIA documents which relate to the WHS.	given the distance offshore and associated context, the impact will be very slight on the Lake District WHS, but we do consider it reasonable that this impact is properly assessed. Furthermore, we appreciate that there are other offshore wind energy developments in the vicinity, which should be part of an assessment of cumulative potential impacts on the Outstanding Universal Value of the English Lake District WHS.
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rely,

  
Dr Christopher Pater  
**Head of Marine Planning**

- cc. Peter Owen (Inspector of Ancient Monuments, North West Region, Historic England)
- Mike Collins (Team Leader Development Advice North East and Yorkshire – Regions Group)



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