

Brumwell, Todd

From: Dogger Bank D
Sent: 15 October 2024 16:13
To: [REDACTED]
Cc: Dogger Bank D
Subject: RE: Historic England advice on case PL00792919
Attachments: _HERef_PL00792919_D196709.pdf

Hi Keith,

Thank you for your attached response to the Dogger Bank D Wind Farm scoping consultation.

Unfortunately it was sent to the Humber Low Carbon Pipelines project mailbox (which is no longer monitored, as the project has been withdrawn), rather than the Dogger Bank D Wind Farm project mailbox.

Your response was therefore not included in the Scoping Opinion for Dogger Bank D Wind Farm. We will however publish your response on the National Infrastructure website and forward it to the Applicant.

Kind regards
Emma



The Planning
Inspectorate

Emma Cottam | Senior EIA Advisor
The Planning Inspectorate
T [REDACTED]



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From: [REDACTED]
Sent: Monday, July 22, 2024 11:32 AM
To: Humber Low Carbon Pipelines <HumberLowCarbon@planninginspectorate.gov.uk>
Cc: [REDACTED]
Subject: Historic England advice on case PL00792919

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Dear Emma

I am writing in relation to the following:

NSIP: National Significant Infrastructure Project (DCO)
Dogger Bank D Wind Farm
[Case Ref. PL00792919; HE File Ref. EAST RIDING NSIPS; Your Reference. EN010144]

Yours Sincerely

Keith Emerick
Inspector of Ancient Monuments

E-mail: [REDACTED]

Direct Dial: [REDACTED]

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DPC:76616c646f72



Historic England

Ms Emma Cottam
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Direct Dial: [REDACTED]

Our ref: PL00792919

22 July 2024

Dear Ms Cottam

re: **ENVIRONMENTAL IMPACT ASSESSMENT (EIA) - SCOPING REPORT
DOGGER BANK D WIND FARM.
CASE REFERENCE EN010144**

Thank you for your communication of 25th June 2024 consulting Historic England about the above EIA Scoping Report.

While Historic England broadly welcomes measures to mitigate and adapt to the effects of climate change, we are aware that such developments have the potential to harm the significance of heritage assets and their settings. With this in mind Historic England has drawn up guidance for planners and developers on climate change and renewable energy technologies, including *Wind Energy and the Historic Environment* available at www.helm.org.uk <<http://www.helm.org.uk>>.

To assist in the implementation of national planning policy Historic England has produced guidance on managing change within the settings of heritage assets. The guidance offers a framework for the consideration of setting, applicable to designated and non-designated heritage assets, and for assessing the implications of development affecting the setting of a heritage asset. It provides the principal Historic England advice on the issue of setting and should be used in conjunction with other relevant guidance. The *Setting of Heritage Assets* is available at www.english-heritage.org.uk/publications/setting-heritage-assets/ <<http://www.english-heritage.org.uk/publications/setting-heritage-assets/>>.

Our initial review indicates that the proposed development could, potentially, have an impact upon a number of designated heritage assets and their settings in the area. In line with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, and National Infrastructure Advice Notes, we would expect the Environmental Statement to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and sufficient to understand the potential impact of the proposal on their significance.



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We would draw your, and the applicant's attention, in particular, to the following designated heritage assets:

Scheduled Monuments

Listed Buildings

Registered Parks and Gardens

We recommend that the applicant should contact the relevant local authority Historic Environment Record for further information on designated heritage assets, and including the relevant local authority(s) for the location of conservation areas.

We reiterate that this is **not** an exhaustive list and other heritage assets may also be identified as part of the assessment process which would require appropriate consideration. In particular, we would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed. Methodologies that can help to inform the extent of the study area include a Visual Impact Assessment and the production of a Zone of Theoretical Visibility (ZTV) in line with current guidance. The ZTV of the proposed development should initially be based on topographical data before the impact of existing trees and buildings etc. on lines of sight is assessed.

Given the heights of the structures associated with the proposed development and the surrounding landscape character, this development is likely to be visible across a large area and could, as a result, affect the significance of heritage assets at some distance from this site itself.

We would also expect the Environmental Statement to consider the potential impacts which the proposals might have upon those heritage assets which are not designated. The National Planning Policy Framework (NPPF) defines a heritage asset as "a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest". This includes designated heritage assets and assets identified by the local planning authority (including local listing). This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk <<http://www.heritagegateway.org.uk>>) and relevant local authority staff.

We recommend that the applicant involve the Conservation Officers of East Riding of Yorkshire Council and City of Kingston Upon Hull Council and the archaeological staff at Humber Archaeology Partnership, Hull in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the



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historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

In general terms, Historic England advises that a number of considerations will need to be taken into account when proposals for wind energy and its associated infrastructure are assessed. This includes consideration of the impact of ancillary infrastructure, such as tracks and grid connections, as well as the turbines themselves:

- The potential impact upon the historic character of the landscape, including landscape features which positively contribute to character.
- Direct impacts on heritage assets (buildings, monuments, sites, places, areas, landscapes), whether designated or not.
- Impacts on the settings of heritage assets since elements of setting can contribute to the significance of a heritage asset. An assessment of the impact on setting will be proportionate to the significance of the asset and the degree to which the proposed changes enhance or detract from its significance and the ability to appreciate the asset. In the consideration of setting a variety of views may make a contribution to significance to varying degrees. These can include long-distance views as well as the inter-visibility between heritage assets or between heritage assets and natural features. For further advice see *The Setting of Heritage Assets*.
- The potential for archaeological remains.
- Effects on landscape amenity from public and private land.
- The cumulative impacts of the proposal.

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.

Consideration should also be given to undertaking a practical exercise with either a crane or balloons erected at the height of the proposed structures so that all parties are to better able to understand the landscape impact of the proposals. We have been engaged in other major developments where this technique has been used and it greatly assisted the identification of the key issues and impacts from which the resulting EIA was able to focus its assessment.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.



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We have the following comments to make regarding the content of the Scoping Report, detailing first the offshore cultural heritage, and then the terrestrial cultural heritage:

Offshore cultural heritage and archaeology: -

In view of the comments we provided on the previous Scoping Report, we welcome the inclusion of scoped in impacts related to the proposed Dogger Bank D array area.

With regard to references to the updated National Policy Statements however, it is unclear why they have not been included in section 7.11 'Offshore Archaeology and Cultural Heritage'. This is something that needs to be adequately addressed in any preliminary environmental information report (PEIR).

It is understood that since the previous iteration of the Scoping Report, marine geophysical survey data has been completed and archaeologically assessed for the proposed array area, with a further survey of the new offshore export cable to take place in 2024/2025. In addition, a geotechnical survey is similarly planned for 2024/2025 for both the array area and offshore export cable.

In consideration of this approach, we feel that this has the potential to inform the planned PEIR and Environmental Statement (ES), to outline a clearer indication of development related impacts. Whilst also informing future strategies of mitigation and potential offsetting, through an improved picture of the nature, extent and potential significance of recorded sites, and potentially revealing previously unrecorded heritage assets also.

In the future PEIR and ES care should be taken to reference and fully utilise the most up to date North Sea Prehistory Research and Management Framework. This, along with the assessment of archaeological boreholes and vibrocores and sub-bottom profiling data, should as far as possible identify the potential depth and character of deposits of archaeological interest through a preliminary deposit model as part of the desk-based assessment. This should be prepared by a geoarchaeologist. The deposit model will also help to inform any subsequent evaluation strategy, e.g. borehole sampling, geophysical survey, or ROV investigations. In this regard the PEIR should also look to utilise the guidance document: Gribble J. and Leather S. (2011) Guidance for Offshore Geotechnical Investigations and Historic Environment Analysis: guidance for the renewable energy sector. Published by the former COWRIE Group.

Responses to Scoping Questions

1.

Do you agree with the characterisation of the existing environment?



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We consider that when formulated, the PEIR should, when incorporating seabed mapping and seabed/sub-seabed investigations and synthesising such data to present an archaeological assessment (as described in section 7.11.8) to support the application - has the potential to provide a clear characterisation. At present the content of the Scoping Report can only provide a general and very summarised description of the area in which this development is proposed.

2. **Have all the offshore archaeology and cultural heritage impacts resulting from the Project been identified in the Scoping Report?**

We are of the opinion that the summarised impacts in the Scoping Report provide an illustration of potential impacts to offshore archaeology and cultural heritage resulting from the proposed project. We do however expect more refined detail of such impacts to be fully identified and explained at future stages of pre-application and ES with respect to relevant NPS's.

3. **Do you agree with the offshore archaeology and cultural heritage impacts that have been scoped in for / out from further consideration within the EIA?**

As detailed above, we are pleased to see that impacts relating to the proposed array area have now been included. Therefore, we feel impacts to offshore archaeology and cultural heritage have in general been adequately scoped in to support the future assessment process.

4. **Have all the relevant data sources been identified in the Scoping Report?**
The Scoping Report provides a summary of data sources. We do however expect a much more detail list of relevant data sources will be included in the PEIR.

5. **Do you agree with the proposed assessment approach?**

The assessment approach needs to ensure clear reference and consideration of the



most up to date National Policy Statements for energy infrastructure

Terrestrial archaeology: -

We have previously provided comments on the first iteration of the Scoping Report in May 2023. Historic England has the following comments in addition to those previously set out:

As a means of additional clarification for the Planning Inspectorate and Applicant we have provided responses to the questions posed in 8.7.8, para 1306, page 270.

1. Do you agree with the characterisation of the existing environment?

We agree with the generality of the characterisation of the existing environment as presented, but we do not fully understand the statement ‘The earliest evidence of human occupation on the Holderness plain can be traced to the Neolithic period’ (para 1261).

What is meant by ‘evidence’? Mesolithic material has been discovered in the area, and given that the statement at para 1261 continues: ‘At this time the area would likely have consisted of lakes, marshes, islands and woodland’, it would be sensible to assume that such an environment - and particularly the wetland/dryland zone - would have been ideal for Mesolithic use, and therefore of archaeological potential. This is hinted at in para 1262 but needs to be made explicit.

The characterisation exercise would benefit from some initial, high level research questions being posed.

The chronological approach is straightforward, but it would be useful if themes could be identified - not least the possibility of looking at landscape change and evolution at landscape scale.

The content of the Scoping Report provides a general and very summarised description of the area in which these developments are proposed, but we feel such detail fall short of being considered to offer a “characterisation”. It is our understanding that this would be formulated within the PEIR and ES synthesising such data to present an assessment to support an application.

2. Have all the onshore archaeology and cultural heritage impacts resulting from the Project been identified in the Scoping Report?

Unfortunately, we are not in a position to agree that the onshore archaeology and cultural heritage impacts resulting from the Project have been identified in the Scoping Report.



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3. Do you agree with the onshore archaeology and cultural heritage impacts that have been scoped in for / out from further consideration within the EIA?

As we have stated above, the PEIR and ES should consider scoping in the full suite of impacts on significance once the characterisation exercise has been fully completed..

4. Have all the relevant data sources been identified in the Scoping Report?

No. The report authors should look at the Skipsea Castle Landscape Project, being conducted by the University of York. This provides an up to date assessment of the archaeological potential of a significant part of this landscape.

5. Do you agree with the proposed assessment approach?

As raised above, we are of the opinion that a full and adequate archaeological assessment, an assessment of impact, and full suite of mitigation needs to be set out within the PEIR and ES.

Yours sincerely,

Keith Emerick

Keith Emerick
Inspector of Ancient Monuments

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