



Historic England

Aquind Interconnector Project Team
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol BS1 6PN

25th January 2021

Dear Mr Mahon,

AQUIND Interconnector Project – The Examining Authority’s Second Written Questions and requests for information (ExQ2) Issued on 7th January 2021

Planning Inspectorate Ref: EN20022

Our Registration ID: 20025047

The Historic Buildings and Monuments Commission for England (known as Historic England) is the Government’s advisor on all aspects of the historic environment in England. Historic England’s general powers under section 33 of the National Heritage Act 1983 were extended (via the National Heritage Act 2002) to modify our functions to include securing the preservation of monuments in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England. We also provide our advice in reference to National Policy Statements and in recognition of the English marine plan areas as defined by the Marine and Coastal Access Act 2009, the UK Marine Policy Statement and any published or draft marine plans.

Further to receipt of the second set of written questions (dated 7th January 2021) we hereby offer the following response to those questions directed to Historic England.



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4 Cultural heritage

Question CH2.4.1

“With reference to paragraph 5.6.12 of NPS EN-1, what elements of cultural, historical and functional significance for Fort Cumberland’s setting are derived from the ‘fields of fire’? How do these elements:

a) apply to the land where the ORS facility is proposed to be located; and

b) apply to the land where proposed landscape mitigation is to be planted?”

“How would the Proposed Development affect such significance and the future value and understanding of the asset? Would mitigation planting itself affect the significance of the asset’s setting?”

Response:

Please note that in responding to this question we have assumed that the correct paragraph reference is 5.8.12 (as opposed to 5.6.12).

Fort Cumberland was designed to enable 360 degree defence. Specifically its purpose was to defend the harbour and also to prevent an enemy landing on shore within its landward defences, and was designed to strategically work in conjunction with Southsea Castle, and other intermediary defences, in ‘sweeping’ the 4,000 yards of intervening beach between the Castle and Fort Cumberland.

The Fort’s characteristic ‘star’ shape and the positioning of armed Bastions facing a multitude of directions, illustrates clearly that in addition to providing coverage of the eastern Langstone channel and southern sea frontage, the Fort was intended to provide a field of fire across open areas of ground to the west and north. This approach contrasts with some other nearby fortifications, such as Gilkicker Fort and Point Battery, which were both designed to specifically face in a seaward direction; it is more akin to the design of Fort Monckton which also had both seaward, and landward-facing glacis defences.

The western-facing aspect of Fort Cumberland received additional supporting defences as part of its original design that emphasise the importance of defending this approach. The Fort has a western facing ravelin, the only such feature on the Fort, which provides enhanced protection and additional scope for tactical defence on the western flank of the Fort. Later in the 19th century the Royal Commission recommended that all works between the Fort and Southsea Castle should be connected by a road along the shore. In addition to this modifications were made to the south and left bastions to ensure a clear field of fire in south and south westerly directions.

The field of fire to the west and south west is therefore of illustrative historic value. Such a value is dependent on visibility and has the power to aid interpretation of the past through making connections with, and providing insights into past activities at particular locations.

It is noted, however, that the field of fire (which would have extended some significant distance to the west) has been diminished by 20th century development, beyond and surrounding the proposed location of the ORS building and proposed landscape mitigation. Although it could be said that this lessens the strength of its illustrative historic value, it does not completely negate it as a contributing element of



the significance of the Fort. The proposed building itself is of relatively limited scale and at a reasonable distance from the Fort (in comparison to location and massing of surrounding development).

The impact of the proposal on the illustrative value and overall significance of the Fort is therefore perceived by Historic England to be no more than a moderate level of less than substantial harm. The specific element of harm, in relation to the experiential experience of the Fort and its field of fire, lies in the proposed positioning of the ORS building within the chosen area of land (the car park). With its proposed height and location the building will likely obstruct the view of Fort Cumberland Road from the western defences of the fort, thereby diminishing the illustrative connection between the fort and its role in providing defence along key historic land routes.

It is possible that mitigation planting, although softening the appearance of the building, could have the same impact, particularly if it were to obstruct views in the same manner.

Question CH2.4.3

“In its Written Representation [REP1-209], Historic England raised issues in respect of A1 and A2 seabed anomalies. Is Historic England now content with the Applicant’s proposed approach to dealing with these?”

“If not, what are the implications that the ExA needs to take into account in respect of the Examination?”

Response:

We acknowledge within the Applicant’s Response to Written Representations (Document Ref: 7.9.5) that the Marine Archaeology Outline Written Scheme of Investigations (WSI) (Document Ref: 6.3.14.3) secures our recommendations. We are therefore satisfied that the draft deemed Marine Licence (dML) adequately secures the Marine Archaeology WSI.

We also acknowledge and accept the Applicant’s response to continue the discussion and development of mitigation for such heritage assets post-consent, should consent be granted, through the mechanisms set out in the Marine Archaeology Outline WSI and the draft DCO (Document Ref 3.1 - Version 5, dated 23rd December 2020).

Question CH2.4.4

“Has agreement been reached with regards to the geo-archaeological assessment approach to ‘medium’ status fine-grained deposit cores and the extent of their investigation?”

“If not, what are the implications that the ExA needs to take into account in respect of the Examination?”

Response:

We accept the geo-archaeological assessment conducted to date and that the information presented in the submitted application provides a description of the baseline archaeological character of the proposed development area.



In reference to the Applicant's Response to Written Representations (Document Ref: 7.9.5). We note the attention given to the commitment that further analysis could be possible through the delivery of any agreed Marine Archaeology WSI. However, we appreciate that any such analysis will be dependent on the decision by the Consent Holder to commission further geotechnical survey. Regarding this examination, we accept that measures to deliver a Marine Archaeological WSI are included with the draft dML. However, we appreciate that it is for the Examination Authority to consider the adequacy of these measures in reference to the National Policy Statement(s) as relevant to this examination.

Question CH2.4.5

"Has agreement been reached with regards to the assessment, classification and approach to possible palaeo-landscape features set out in Chapter 14 of the ES [APP-129]?"

"If not, what are the implications that the ExA needs to take into account in respect of the Examination?"

Response:

We accept that further geotechnical work could be undertaken post-consent, as described within the Applicant's Response to Written Representations (Document Ref: 7.9.5; Ref: 1.3(v)) and that they will continue to engage with Historic England as they prepare pre-construction survey plans. It is also an important matter that they will consult with us to produce a marine archaeology WSI prior to seeking formal approval from the MMO. We also acknowledge that methodologies that support geo-archaeological analysis are contained within the marine archaeology outline Written Scheme of Investigation which will be used to produce any post-consent WSI. We are therefore satisfied that a mechanism exists within the draft dML which will provide for the production of a marine archaeological WSI, as secured through Schedule 15 (deemed marine licence), Part 2 (conditions), condition 4 (Pre-construction plans and documentation), sub-paragraph 2.

Question DCO2.5.6. Development Consent Order

"In its Written Representation [REP1-209], Historic England raised a number of matters relating to mitigation in the marine environment and the Deemed Marine Licence (DML) that it wished to see addressed. For clarity, there are understood to be:

- *Expand list of survey technologies.*
- *Expand Condition 3(1)(a)(ii) to include archaeological features and/or the identification of AEZs as identified within the ES."*
- *In Condition 3(2), a timeframe is required for the submission of the pre-construction survey plan to the MMO.*
- *Expand Condition 4(1)(viii) to include 'archaeological construction exclusion zones'.*
- *Revise Condition 4(2)(i) to expand on the delivery of mitigation*
- *Check Condition 6 – the quoted condition (4(1)(vi)) does not appear elsewhere in the draft DML.*
- *Condition 10(1)(b) could reference 'archaeological construction exclusion zones'."*



“These were added to the agenda for discussion during Issue Specific Hearing 1 on the dDCO, to which Historic England was invited. In Historic England’s absence, the Applicant explained its current position, following written submissions on the matters in [REP2-014] and [REP5-058], the latter being a transcript of the Applicant’s oral representation to ISH1. Historic England’s position on this remains unclear in the SOCG with the Applicant. Please could Historic England provide the Examining Authority with an update on its position and indicate which, if any, of these matters remain unresolved, along with any suggestions for progressing towards agreement.”

“Furthermore, there appear to remain two further unresolved differences between the parties over whether the DML:

- i) includes adequate provision for the delivery of the project specific marine WSI.*
- ii) provides appropriate timescales for the review and approval of the marine WSI before the commencement of construction activities.”*

“The Applicant provided a view on these in [REP2-014] and at ISH1. Please could the Examining Authority have an update and position explanation from Historic England.”

Response:

To address this question, we provide a response for each of the above bullet points:

- *“Expand list of survey technologies”* – We accept that procedures for agreeing survey methodologies should be delivery through the Pre-Construction Survey Method Statement to be agreed with the MMO (as provided for in Schedule 15 (deemed marine licence), Part 2 (conditions), condition 3 (Pre-construction surveys). We also acknowledge that Historic England, through consultation on the production of a marine archaeology WSI, will have an opportunity to comment on the survey techniques to be employed. Our concerns have therefore been addressed by the inclusion of these procedures within the draft dML which include provision for engagement with Historic England.
- *“Expand Condition 3(1)(a)(ii) to include archaeological features and/or the identification of AEZs as identified within the ES”* – We acknowledge that archaeological measures are addressed through Schedule 15, Part 2, Condition 4(2). We therefore have no further advice to offer at this stage.
- *“In Condition 3(2), a timeframe is required for the submission of the pre-construction survey plan to the MMO”* – We acknowledge that the timeframe will be detailed in reference to a marine archaeology WSI, produced in consultation with Historic England. We accept this position and we have no further comment to offer; although we defer to the MMO regarding any detail that they consider as relevant and necessary for inclusions with any dML.
- *“Expand Condition 4(1)(viii) to include ‘archaeological construction exclusion zones’”* – We offer the correction that the condition in questions is 4(1)(c)(viii) and we understand that the Applicant intends to make the requested amendment. We therefore look forward to seeing how this amendment is included within the next draft version of the dML.



- *“Revise Condition 4(2)I to expand on the delivery of mitigation”* – We offer the correction that the condition in questions is 4(2)(c) and we accept the response provided by the Applicant regarding delivery of necessary measures through the conditions already stipulated for the preparation of a marine archaeology WSI.
- *“Check Condition 6 – the quoted condition (4(1)I(vi)) does not appear elsewhere in the draft DML”* – We acknowledge and accept the statement in the Applicants Response to Written Representations (Document Ref 7.9.5) that a correction has now been made to the draft DCO. We therefore have no further comments to offer.
- *“Condition 10(1)(b) could reference ‘archaeological construction exclusion zones’”* – We acknowledge and accept the statement by the Applicant regarding measures in place within the dML for archaeological construction exclusion zones and we therefore have no further comment to offer.

Regarding the two further unresolved differences between the parties identified within the draft dML:

- i) *“The inclusion of adequate provisions for the delivery of the project specific marine WSI”* – We are now satisfied by the provisions included within the draft dML and we appreciate the response and explanation provide by the Applicant regarding the issues we raised. We therefore have no further comment to offer.
- ii) *“Provides appropriate timescales for the review and approval of the marine WSI before commencement of construction activities”* – We accept the provisions made in the dML should allow for the approval of a marine archaeology WSI prior to the commencement of construction activities, as provided through Schedule 15; Part 2; condition 5(1).

The final matter we would like to highlight for your attention is that the official title for Historic England is the Historic Buildings and Monuments Commission for England. We request that the Applicant amends the draft DCO accordingly to use this title where necessary.

Yours sincerely,


 Dr Christopher Pater
Head of Marine Planning

cc. Richard Peats and Iain Bright (Historic England, London & South East Region)
 Pip Naylor (Historic England, Marine Planning Archaeological Officer)



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