

Wendy McKay  
Lead Member of the Examination Authority  
National Infrastructure  
Planning  
Temple Quay House  
2 The Square  
Bristol, BS1 6PN

3<sup>rd</sup> March 2025

Dear Ms McKay

**North Falls Offshore Wind Farm – Examination Authorities First Questions****Response deadline 4<sup>th</sup> March 2025 (Deadline 2)****PINS Ref: EN010119****Interested Parties Ref: 20051018**

The Historic Buildings and Monuments Commission for England (Historic England) is a statutory consultee in relation to the historic environment, the lead body for the heritage sector and the Government's principal adviser on the historic environment.

Further to the publication of your First Written Question on 4<sup>th</sup> February 2025, we offer the following responses.

**Question 12.1.6 (The Applicant, ECC)  
Offshore Archaeological Exclusion Zones (AEZ)**

*To what extent is ECC content with off-shore geophysical survey, and potential Archaeological Exclusion Zones? Given that previously unidentified sites or features of interest or significance may also be present in as yet unsurveyed areas, what assurance is there that AEZs would allow further sites to be avoided?*

**Response**

Although this question is directed to the applicant and Essex County Council (ECC), Historic England, as the relevant archaeological advisor for English inshore marine planning area (i.e. 12 nautical mile territorial sea limit) and English offshore marine planning area, we wish to offer comments on this question.

We note the geophysical data collected in 2021 to inform the Development Consent Order (DCO) application were assessed to be of good quality, although the line spacings meant that coverage was not as high in all areas, as recommended within the Historic England publication *Marine Geophysics Data Acquisition, Processing and Interpretation: Guidance Notes* (2013). However, we are content that those data are of an acceptable standard and coverage for the establishment of a baseline to inform Chapter 16 (Offshore and Intertidal Archaeology and Cultural Heritage) [Examination Ref: APP-030] of the Environmental Statement within the DCO application. We therefore appreciate that AEZs will allow for the protection of presently identified high potential archaeological sites within the proposed development area.

We would, however, like to reiterate the importance of the collection of higher resolution geophysical survey data with greater than 100% coverage within areas that might be impacted by construction activities. It is important to highlight the importance of pre-construction surveys with data produced subject to professional archaeological assessment to further investigate both known sites and to identify any previously unknown heritage assets that might be encountered within the project area. This archaeological analysis will provide the mechanism to ensure a robust mitigation strategy is designed and implemented. The provision for this mitigation should be secured through the relevant deemed marine licence conditions to provide for the production of a post-consent Written Scheme of Investigations (WSI), in line with the Outline Offshore WSI [Examination Ref: APP-246], submitted as part of this DCO application.

#### **Questions 12.1.12 (The Applicant, Historic England)**

##### **Historic England Relevant Representation: RR-130**

*Historic England has registered as an IP and the Applicant will be aware of RR-130 which contains 21 points to be addressed. This includes:*

- i. A marine geotechnical survey work has not been conducted. Please clarify how the Outline Offshore Written Scheme of Investigation (WSI) provides for geoarchaeological analysis of geotechnical survey materials. Additionally, confirm that geoarchaeological investigations would be secured through the DCO and draft Marine Licences.*
- ii. Some archaeological evaluation work has been undertaken, for example geophysical survey, to determine the significance and therefore the degree of harm to those assets. Historic England raised concerns during the pre-application process (See comments in Table 25.1) about the limited extent of many surveys, in the context of the large scale of the scheme. Please set out how the Application information overcomes Historic England's concerns whether the detailed magnetometry technique adopted is suitable for all of the diverse local topographies, pedologies, hydrologies, archaeologies and geologies along the route.*

- iii. At present the values set out in Chapter 25, Table 25.11 and assigned to individual heritage assets is, in Historic England's view, are based on a partial assessment because of the limited locations of the field evaluation undertaken. Please clarify whether these heritage values are therefore only interim or draft, and set out any risk to any implementation stage of the project.*
- iv. The Outline Code of Construction Practice (APP-248) does not address archaeology other than by cross-reference to the Onshore WSI. Please amend the CoCP to include a section on archaeology, so that headline principles around its role in site inductions, the timings, scope and implementation of fieldwork, as well as protocols for unexpected discoveries, public engagement, County Archaeologist sign-off of investigations, and the monitoring and maintenance of no dig areas are highlighted within.*
- v. Draft Development Consent Order 19. The Draft Development Consent Order (APP-005), Schedule 1, Part 3, Requirement 11(1) – Onshore Archaeology. In addition to submission to the LA, Historic England has recommended that the approval of the document is sought from both the County Council (ECC Place Services) and Historic England. Please amend to confirm that consultation will also be undertaken with these organisations.*

*Please can the Applicant and Historic England provide an update to all of the outstanding points.*

## **Response**

We note the Examining Authority has requested for us to respond to this question. In relation to the matters detailed in parts i-v, we are currently waiting for a response by the Applicant on these points, which are being addressed through the Statement of Common Ground. This is currently a work in progress.

Yours sincerely,

Dr Christopher Pater

**Head of Marine Planning**