

Our Ref: PL00752883

Your Ref: EN010119

Wendy McKay  
Lead Member of the Examination Authority – North Falls Offshore Wind Farm  
National Infrastructure  
Planning  
Temple Quay House  
2 The Square  
Bristol, BS1 6PN

25<sup>th</sup> April 2025

Dear Ms McKay,

#### **North Falls Offshore Wind Farm – Examination Deadline 4**

#### **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.

We offer the following advice for your consideration at Deadline 4 (25<sup>th</sup> April 2025).

#### **Applicant's Comments on Written Representations (Examination Ref: REP3-037; dated March 2025)**

We acknowledge that changes have been made to the project documentation regarding the protected status of the HMS E6 as we stated in paragraph 4.3 of our Written Representation (Examination Ref: REP02-039). We therefore have no further comments to make on this matter.

We note the applicant's response to paragraph 4.7 in relation to the completion of geoarchaeological analysis prior to the commencement of construction activities (subject to authorisation). We understand that completion of all analysis prior to commencement may be unfeasible and acknowledge that draft Development Consent Order (Exam Ref: REP3-009), Deemed Marine Licence Schedule 8 (Generation Assets), Condition 21(2)(h) and Schedule 9 (Transmission Assets), Condition 22(2)(h) require a timetable for all further site investigations, which must allow sufficient opportunity to establish a full understanding of the historic environment prior to any commencement.

We acknowledge, in reference to paragraphs 4.13 and 15.1, that the Offshore In-Principle Monitoring Plan (Exam Ref: APP-245) refers to the Offshore WSI as including the relevant detail for archaeological monitoring. Whilst we are disappointed no further detail will be added to the Offshore In-Principle Monitoring Plan for ease of cross-reference, we accept the applicant's response.

We accept the Applicant's response to paragraph 16.15 regarding Table 1.9 in relation to residual effects to "A2" anomalies being considered "minor adverse". We understand that further detail has been added to paragraph 99 of the Outline Offshore Written Scheme of Investigation (Exam Ref: REP3-016; Rev 2; dated March 2025), although this doesn't appear within the track changes version (as referenced). It would be useful therefore to clarify what changes have been made. In response to our comment in paragraph 16.17 of our Written Representation (Exam Ref: REP2-039), we acknowledge the DCO conditions which secure the Protocol for Archaeological Discoveries.

We note the Applicant's response to our comment in paragraphs 19.3 and 19.4 of our Written Representation regarding our recommendation to secure the completion of geotechnical survey through specific Development Consent Order (DCO) conditions. We accept that archaeological investigations and mitigation measures are provided for through the draft DCO conditions and described within the Outline Offshore Written Scheme of Investigation (WSI). In reference to paragraphs 4.6, and 16.1-16 in our Written Representation regarding the Outline Offshore WSI, we will address the changes made by the Applicant in relation to this document below.

### **Outline Offshore Written Scheme of Investigation (Examination Ref: REP3-016; Rev 2; Dated March 2025)**

We accept that our comments made in paragraphs 4.8, 16.8, and 16.9 of our Written Representation will be addressed through method statements produced prior to the commencement of any development area survey investigation campaign(s).

With regards to the direct access by a geoarchaeologist to the cores, as set out in paragraph 4.9 of our Written Representation, we maintain this is the preferred option for the geoarchaeological programme. Whilst not specifically addressed in the updates to the Outline Offshore WSI (as referenced), we acknowledge that an Offshore WSI should be produced post-consent (subject to authorisation). Furthermore, that to produce this WSI, the Consent Holder will be required to consult the "statutory historic body" (i.e. Historic England), as per draft Deemed Marine Licences, Schedule 8, Condition 21(2) and Schedule 9, Condition 22(2) which will provide the opportunity for any outstanding matters to be addressing to the satisfaction of all parties.

Whilst we acknowledge and are pleased to see that most changes requested within our Written Representation were made to the Outline Offshore WSI submitted at deadline 3, not all were. We have noted above in relation to the Applicant's Comments on Written Representations (as referenced) where their explanations for these omissions are acceptable. Additionally, we offer the following comments on the Outline Offshore WSI (as referenced) submitted at Deadline 3 (18<sup>th</sup> March 2025).

With regards to the securing of geoarchaeological assessment and the Marine Licence conditions within the draft DCO, the Outline Offshore WSI in Section 1.5.2, paragraph 75 acknowledges that no geotechnical surveys have been undertaken to date, but that there is a commitment to geoarchaeologically assess geotechnical data collected for the project.

As such, it is important the any subsequent WSI produced in accordance with the Outline Offshore WSI (as referenced and included within draft DCO Schedule 12 (Documents to be Certified), clearly set out the expectations for all geotechnical surveys. This should be considered as inclusive of a retained archaeological advice service to support analysis and interpretation of data produced by all future surveys. This should be considered inclusive of any geotechnical survey campaign(s) conducted post-consent, subject to authorisation. The involvement of a retained archaeological advice service, and the application of an agreed WSI, should inform all geotechnical survey planning, regardless of whether or not they are collected for archaeological purposes.

Yours sincerely,



**Head of Marine Planning**