

Planning Inspectorate
North Falls Team
By email only

Your ref: EN010119

Registration ID: 20051018

30th May 2025

Dear North Falls Team,

Application by North Falls Offshore Wind Farm Ltd for North Falls Offshore Wind Farm

The Examining Authority's written questions and requests for information (ExQ2) Issued on 13 May 2025

Please find below Historic England's responses

EXQ ref	Response required from	Question	HE response
Q9.1.5	The applicant, Historic England, Essex County Council	<p>Requirement 11 - Onshore Archaeology</p> <p>The ExA notes that following discussion at ISH2 this requirement was updated in line with the Five Estuaries drafting at Deadline 4 [REP4-004].</p> <p>(i) The parties are requested to confirm that the drafting of this requirement is now agreed and that no further drafting amendments are sought.</p> <p>(ii) Please provide an update in relation to the draft</p>	<p>The wording and content of Draft Archaeological Mitigation Strategy and Outline Onshore Written Scheme of Investigation has been agreed with the applicant, and we understand the final draft versions will be submitted by them for this deadline.</p> <p>We have also received and discussed amended wording for the requirement and good progress has been made towards a final agreed wording.</p> <p>We are awaiting confirmation that the final version has been adopted and that this is matched by an appropriately worded commitment in the CoCP.</p>

		Archaeological Mitigation Strategy and Outline Onshore Written Scheme and whether it is agreed that these now provide satisfactory commitments to post-consent surveys and trial trenching.	
Q12.0.4 -	Historic England	Impacts on Sediments and Geoarchaeological Potential There is potential for significant impacts on preserved paleochannels and deposits with high geoarchaeological potential. What, if any, further investigations and evaluation do you consider necessary and proportionate at this stage?	<p>As a detailed desk-based geoarchaeological assessment has been conducted and presented within the application documents, further desk-based assessment would provide little enhance, so is not required or proportionate at this time. Further investigation and evaluation must take the form of the collection of geotechnical samples from across the offshore project area.</p> <p>Given the length of time that would be required to collect, assess, and report this data it would be unrealistic to consider this proportionate within the examination of this project. As per our previous response (REP4-076), 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 - REP3-016). This would include the collection of geotechnical samples.</p>
Q12.0.5	Historic England	Geoarchaeological Cores	With regards to Onshore archaeology, we can confirm further geoarchaeological sampling would be

		Please advise whether you consider the geoarchaeological coring to be sufficient in relation to the size and complexity of the project. What further information/investigation do you consider is required and at what stage?	included within the scope of the new draft AMS. This work will now form part of the programme of archaeological work that has now been agreed to be undertaken prior to commencement of the scheme. This is detailed in the AMS and the OWSI.
Q12.0.6	Historic England and The applicant	Draft Development Consent Order Please provide an update on discussions between the applicant and Historic England in relation to the wording for Requirement 11(1) of the draft Development Consent Order. Advise on whether any progress is being made to agree wording within the dDCO and any unresolved matters.	We have received and discussed amended wording for Requirement 11(1) with the applicant and ECC. Good progress has been made towards a final agreed wording, and we are awaiting confirmation that the final version has been adopted and that this is matched by an appropriately worded commitment in the CoCP.
Q12.0.7	Historic England	NPS EN-5 and the Electricity Act 1989 Do you consider that the applicants have had regard to the desirability of protecting sites, buildings and objects of architectural, historic or archaeological interest, and have done what they reasonably can to mitigate any effects in accordance with NPS EN-5 paragraph 2.2.10 and Schedule 9 of the Electricity Act 1989?	Scheduled 9 of the Electricity Act 1989 is an important consideration in relation to an applicant ‘... having regard for...protecting sites, buildings and objects of architectural, historic or archaeological interest.’ EN-5 also sets out at 2.9.25 that ‘...the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if it is satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents.’ This includes ‘archaeological and heritage sites.’ Both policies are potentially relevant in this case. This balancing exercise is

			<p>therefore for the for the ExA and the SoS to undertake.</p> <p>Broadly speaking we confirm the applicant has undertaken an assessment of the known heritage receptors and that the heritage chapters of the ES are adequate for the purposes of this examination.</p> <p>We have set out in our written representation concerns about the absence of evaluation with regards to non-designated heritage assets within the cable corridor. The applicant has however now provided measures to address this with a draft AMS, updated OWSI which is underpinned by a revised wording of the requirement and commitment in the CoCP. Evaluation will now take place prior to commencement of the project subject to consent being granted.</p> <p>We consider the scheme would still be likely to result in some permanent and residual effects to the setting of designated heritage assets from the permanent elements like the sub-station, and through the impact of the cable corridor on non-designated and archaeological remains.</p> <p>We consider the applicant has however taken reasonable measures through design to address these issues and has adopted additional measures through the revised AMS and OWSI to manage the effects of the cable corridor should consent be granted.</p> <p>It would be therefore for the ExA to ensure the public benefits of the scheme outweighs the harm and to</p>
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			address the policy test set out in the EN-5 at 2.2.10.
Q12.0.8	The applicant, and other IPs including ECC	<p>Temporary effects on the setting of designated and non-designated heritage assets</p> <p>Can the applicant provide further justification for its view that any impact during construction would be “short term and reversible” and that impacts would be “slight due to the perceptibility of the works from the identified receptors”. On this basis, it is considered that any change to setting, and associated heritage significance would result in a negligible adverse magnitude of impact [APP-039 para 355].</p> <p>Please can IPs also comment on the temporary nature of effects.</p>	<p>Historic England are mindful that construction effects can be harmful to the historic environment, and there are historic environment receptors within the development area (both designated and non-designated) that will experience effects, and a degree of harm during construction.</p> <p>It is for the applicant to adequately indicate the degree of significant ascribed to an asset and therefore the magnitude of affects.</p> <p>As above, we can confirm the applicant has undertaken an assessment of the known heritage receptors and that the heritage chapters of the ES are adequate for the purposes of this examination</p> <p>It is also important to note that a number of non-designated heritage assets, largely those with buried archaeological remains, within the footprint of the cable route, cable landing site and substation location will experience permanent residual effects during construction.</p> <p>These assets will need to be investigated prior to the construction works commencing. We can confirm that mitigation measures are now set out in the draft AMS and OWSI, but this would be a matter for ECC and the archaeological advisors.</p> <p>The ExA will need to be satisfied that the benefits would outweigh the harm.</p>
Q12.0.9	Historic England, ECC	<p>Archaeological mitigation</p> <p>Are you satisfied with the wording of Requirement</p>	As set out above, we can confirm we have discussed amended wording for Requirement 11(1) with the applicant and ECC.

		11 of the dDCO [REP4-004]? If not, could you provide details of what you would wish to see included and why?	Good progress has been made towards a final agreed wording, and we are awaiting confirmation that the final version has been adopted and that this is matched by an appropriately worded commitment in the CoCP.
Q12.0.10	The applicant, Historic England and ECC. Other IPs may optionally comment	Archaeological Mitigation Strategy and WSI Please provide an update on the updated version of the Archaeological Mitigation Strategy and Outline WSI referred to at ISH1.	The wording and content of Draft Archaeological Mitigation Strategy and Outline Onshore Written Scheme of Investigation has been agreed with the applicant, and we understand the final draft versions will be submitted by the applicant for this deadline.

Yours sincerely

[Redacted Signature]

Team Leader East Region

[Redacted Email Address]

historicEngland.org.uk