



**RESPONSES TO EXAMINING AUTHORITY'S  
QUESTIONS 28/02/2025 (ExQ1)  
ON BEHALF OF THE  
HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND  
(HISTORIC ENGLAND)**

**Interested Party Ref No:  
20050154**

**Dogger Bank South Offshore Wind Farm Projects (Reference No.  
EN010125)**

**Application by**

**RWE / MASDAR**

## **1. INTRODUCTION**

- 1.1 Historic England's remit and reasons for participating in the examination of the DCO application for the Dogger Bank South Offshore Wind Farm (EN010125) ("the Proposal") were set out in our Written Representation [REP1-059]. We continue to be involved in discussions with the Applicants to resolve the outstanding points of difference between us and an updated Statement of Common Ground is under discussion.
- 1.2 For brevity, the scheduled monument known as 'heavy anti-aircraft gunsite, 350m west of Butt Farm' (1019189) is referred to as the 'Butt Farm Gunsite' in the answers provided.

## **2. HISTORIC ENGLAND'S RESPONSES TO THE QUESTIONS**

### **2.1 Question DCO.1.17**

**Title: Requirement 18(2)**

***In the supplementary agenda to ISH1 [EV4-001, ISH1.S2.18], the ExA asked that you confirm that the list of information to be included in 18(2) for each scheme is complete and, if not, to provide details of what additional information you would wish to see included in the list and why. Because the Preliminary Meeting was adjourned, the Hearing was cancelled and the ExA did not receive a response to this question. Can you provide a response?***

Historic England can confirm that that the list of information included in 18(2) for the terrestrial and marine aspects of the scheme is complete.

### **2.2 Question HE1.4**

**Title: 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? If not, why not?***

We 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. However, there are areas of disagreement (planting as mitigation, impact of the Converter Stations on the significance of the Butt Farm Gunsite, and public benefit) between Historic England and the Applicants, but these are matters of degree rather than principle.

### **2.3 Question: HE 1.6**

#### **Title: Assessment Methodology**

***Could you provide a view on the responses to WQ7 and WQ8 (page 59) of the Applicants' Responses to January 2025 Action Points' [AS-155] regarding the methodology for defining the level of importance of heritage assets? Do you agree with the Applicants' stance that increasing the importance of Grade II listed buildings to high importance would not affect the overall findings of the ES?***

Historic England met with the Applicants on 5<sup>th</sup> March 2025 to discuss the emerging Statement of Common Ground. One of the items for discussion was this issue of methodology for defining the level of importance of heritage assets. The Applicants confirmed that they had amended the importance ranking of Grade II buildings from 'medium' to 'nationally important'. Having seen the results of this work and established that there are no physical impacts on those designated heritage assets or their settings, we accept that the overall findings of the ES would not be affected by this change.

### **2.4 Question HE 1.7**

#### **Title: Assessment Methodology**

***Can you review the Applicants' Responses to Issue Specific Hearing 2 Supplementary Agenda Questions Appendix A Heritage assets, the effects and the attributed level of harm in response to ISH2 10.9 [REP2-059] – do you agree with the Applicants' assessment and conclusions? If not, why not?***

We agree with the assessment provided by the Applicants that there will be no direct physical impacts on designated heritage assets during construction.

The Applicants identify that harm will be caused to the significance of Butt Farm Gunsite as a result of development within its setting. We agree with the Applicants that the level of harm will be less than substantial, however, we disagree with the Applicants as to where the harm should be placed on the spectrum of less than substantial harm. The Applicants have identified this level of harm as LSH(L) (less than substantial, harm (lower)) meaning that it is at the lower end of the 'less than substantial harm' to significance scale. Using Table 22-8 in AS-092, (provided by the Applicants) Historic England considers that the level of harm equates to 'Medium Adverse', and therefore at a higher end of the less than substantial harm spectrum, as set out at paragraph 4.7 of our Written Representation [REP1-059]. It is therefore for the decision maker to make the final balancing judgement on the level of harm to significance versus public benefit.

We also note here that should subsequent offshore projects be developed which require onshore infrastructure to be located adjacent to the Butt Farm Gunsite, cumulative impacts will arise which will have the potential to intensify the harm to the significance of the monument.

## **2.5 Question HE 1.16**

**Title: Significance of effects – heavy anti-aircraft gunsite, 350m west of Butt Farm**

***The Onshore Infrastructure Settings Assessment [APP-178] notes that the battery operated as a mixed sex regiment which used women from the Auxiliary Territorial Service to operate radar, communications systems and other support roles, and that it was used also as a training facility, allowing batteries from around the country to gain operational experience. Can you explain how the gunsite and wider area would have been operated for these specific historic uses and consider whether the effects of the Proposed Development on its setting might be take on a different significance in relation to them.***

The scheduled area is only a small portion of the anti-aircraft battery site. Wartime and immediately post-war aerial photography of the site shows that the 'site'

extended to the south of the standing remains towards the proposed Converter Stations (and into the area of the proposed planting on the north side of the proposed Converter Stations, APP-193, ES Vol 7, Chapter 23, Rev 03, fig 23-6) and east to include the farmhouse (Appendix A an aerial photograph of 1946 showing the Battery site at its fullest extent). It also extended to the north of the current site, but not appreciably so. The land to the south of the standing remains included the radar mat (which was subsequently replaced with a radar platform) and appearing as a diamond pattern in Appendix A, and other radar buildings (revealed by the three long shadows immediately east of the guns in Appendix A). To the east towards and south of the farmhouse was the camp for the women (ATS), a football field, and hockey field. All these areas have to be considered integral to the operation of the Gunsite and as part of the setting of the standing remains. The Butt Farm Gunsite is in open country, with farm land and woodland to the south.

It is not clear what sort of archaeological remains might still exist of these features. The buildings were either demolished or dismantled and sold and the radar platform salvaged and re-purposed elsewhere. It is probably the case that the land south of the standing remains has been ploughed since the decommissioning of the Gunsite and therefore we should expect any archaeological remains of the above to be slight – although some remains should still be present. A low-level oblique aerial photograph of 1992 (Appendix B) shows that the radar mat was still visible as a negative cropmark. The implication of this negative cropmark indicates that the posts were probably set in concrete, and that there was still buried evidence for this temporary feature at that time, although we know that the radar mat was already removed by 1946.

Another element which may be present are 'driving bands'. These are the narrow copper (or lead) bands of a soft metal applied to the ends of an artillery shell which expand when the gun is fired, thereby forming a seal between ammunition and barrel so that the propellant gases do not escape from the barrel and continue to drive the shell. These bands became detached once the artillery shell was out of the barrel and can be found in the fields surrounding artillery and anti-aircraft gunsites. The fields south of Butt Farm should have numerous 'driving bands' still waiting to be discovered.

The assessment of the impact of the development proposal on the significance of the Butt Farm Gunsite considers only the standing scheduled remains, and not the entirety of the complex. Understanding what was in the field between the proposed Converter Stations and the standing remains is clearly important to gain an understanding of how the Scheduled portion of the site was staffed, worked and operated. Had the worst-case scenario for the Converter Stations been realised, the opportunities for effective interpretation of the setting of the wider gun-site (particularly when viewed from the Scheduled site) would have been diminished, owing to the presence and dominance of such an overly massive structure, and the reduction of the way in which the site was experienced.

The suggested revised, smaller footprint scheme for the Converter Stations, although still intrusive and dominant is less visually intrusive than the original scheme and may allow interpretation schemes to capture and better communicate understanding of the wider gunsite.

Our knowledge of the full extent of the gunsite offers opportunities for community and participative work and thereby the delivery of greater public benefit. This was referred to in our Written Reps (REP1-059). The fields south and east of the standing remains could be subject to geophysical survey and archaeological evaluation, whilst analysis of the aerial photography could identify the uses of particular buildings. Examination could be made of post-war records to see if the sale of gunsite buildings could be identified, and their new locations discovered. Should it be possible, it might also be beneficial to include the search for 'driving bands' in any subsequent field-walking exercises.

Please also see paragraph to 2.7 below, the Historic England response to Question HE 1.21.

## **2.6 Question HE 1.18**

**Title: Significance of effects – heavy anti-aircraft gunsite, 350m west of Butt Farm**

***The Applicants suggest in response to ERYC's LIR [REP1-048] that for substantial harm to occur 'solely through change to setting, the vast majority of the significance of the asset would need to derive from its setting, and that all, or approaching all of the contribution of that***

***setting would have to be lost'. The Applicants state that, 'in this case, much of the value of the asset is intrinsic to its fabric, which would not be affected, and key elements of the setting comprising the designed fields of fire and the relationship to the wider battery site and views of the gun emplacements from that wider battery site, that contribute to setting would be preserved'. Do you agree with these statements – why, or why not?***

Guidance published by Historic England on setting and the assessment of impact on setting (<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>) makes it clear that setting describes the way in which a place is 'experienced'. The 'experience' of understanding and appreciating the scheduled Butt Farm Gunsite and the wider battery site will be diminished and change dramatically with the introduction of the proposed Converter Stations.

For the reasons given at paragraph 4.7 of our Written Representation [REP1-059], we consider that the level of harm to the significance of the Butt Farm Gunsite is less than substantial, but at the higher end of the spectrum. The Applicants agree that the harm will be less than substantial, albeit we differ as to where the harm is placed on the spectrum of less than substantial harm.

Planning Practice Guidance (18a-018-20190723) indicates that in determining the level of harm requires consideration of policy and the circumstances of the case. It provides that 'substantial harm' is a high test, which is dependent on understanding whether a key element of special interest is seriously affected by a proposal, and which may arise from works to the asset in question, or from development within its setting.

## **2.7 Question HE 1.21**

**Title: Significance of effects – heavy anti-aircraft gunsite, 350m west of Butt Farm**

***The Onshore Infrastructure Settings Assessment [APP-178] notes that there are 60 well-preserved examples of heavy anti-aircraft gunsites in England. How many of these are located in the East Riding? Are these***

***heavy anti-aircraft gunsites usually within open, rural sites and do they form part of a network? Do you consider the heavy anti-aircraft gunsite nearby to Butt Farm to be a particularly well-preserved or special example, and if so, why?***

We are not sure what the Applicants mean by 'well-preserved', and if the implication is 'scheduled'. There are four Scheduled heavy anti-aircraft gunsites in the East Riding of Yorkshire, including Butt Farm. There are other heavy anti-aircraft gunsites in East Yorkshire which have not been scheduled. There are usually two reasons for this: 1) the site does not survive well and does not meet the criteria for Scheduling, or 2) the site is already in a benign management regime and does not need to be scheduled in order to secure its continued conservation.

There is a defensive 'box' around Hull and the Humber, first established in the years immediately preceding World War Two (although there are also First World War anti-aircraft sites in the area). This 'box' extends from Beverley in the north to Immingham in the south, and from Brough in the west to Spurn Point in the east. The assumption was that enemy aircraft would use the Humber as their principal navigation route, and this proved to be the case. Within this 'box' there is a range of features: anti-aircraft gun sites, decoy sites, decoy dock sites, searchlight batteries and ammunition storage sites. All of these elements worked together as a network. heavy anti-aircraft gun sites, for example, would often be located close to decoy dock sites in order to make the decoy sites 'credible', and are frequently located within open, rural areas, or an urban or suburban fringe. Paull Point Battery (Paull Fort), for example, is located south east of Hull, but close to the village of Paull, on its south side, and it was here that the ammunition was stored for the network of anti-aircraft guns. A heavy anti-aircraft battery was also located on the north side of Paull village at Battery Cottage, but away from the village core.

The field of fire for Butt Farm was to the south, towards Hull and the Humber, but each field of fire for each gun site would have butted up against its neighbours in order to provide continuous arcs of fire, so in looking at one gunsite it is necessary to look at the way in which it fitted into a bigger pattern.

Although Butt Farm was part of a co-ordinated network of sites, the sites themselves were subject to change, and reflected changing strategies and



technology. The scheduled heavy anti-aircraft gun site at Stone Creek, East Yorkshire (NHLE 1020187) was established in 1938, but it only existed until 1941 and was never further developed. The Butt Farm site in contrast was established in 1941 but continued in use and to develop into the post-war period. This continuity makes it one of the rarest, surviving heavy anti-aircraft gunsites in England. Butt Farm exhibits considerable technological change as radar and computing became more refined, which in turn resulted in the use of more complex radar controlled anti-aircraft guns which were more powerful, faster loading and able to traverse much faster. The faster traverse was to enable the gun to track jet aircraft.

The faster computing technology and better radar capability is exhibited at Butt Farm in the apertures in the fabric of the Control building which allowed the cabling from the radar mats to enter the building, and thereafter out to the gunsites.

The Butt Farm Gunsite is extremely rare and a hugely important site in the development of defensive infrastructure, but it should be remembered that the visible, scheduled component of the site is only a small portion of a much larger site which extended south towards the site of the proposed Converter Station, and east to include the current farmhouse. It also extended to the north of the current site, but not appreciably so.

Please also see paragraph 2.5 above, the Historic England response to Question HE 1.16.

## **2.8 Question HE 1.22**

**Title: Significance of effects – heavy anti-aircraft gunsite, 350m west of Butt Farm**

***The Applicants' oEMP [REP2-029] confirms that, 'Permanent lighting at the Onshore Converter Stations has been designed to be directed inwards and provided only to essential areas of the site such as key routes and building entrances. This would produce minimal levels of overspill and help maintain dark corridors along key ecological features during the operation phase such as hedgerows and ancient woodland'. Furthermore, Requirement 9 of the draft DCO [REP1-004] would require the submission of detailed design parameters, including details of external lighting, which would need to be agreed by the local***

***planning authority prior to installation. Does this address your concerns regarding understanding the effects from lighting during the operation of the converter stations on the scheduled monument? If not, how do you propose that this matter could be resolved before the close of the Examination, given that the Applicants have stated that they do not intend to provide night-time visualisations of the converter stations?***

It is disappointing that the Applicants have stated that they do not intend to provide night-time visualisations of the Converter Stations. It would appear to be probable that the night time light levels around the Converter Stations will diminish over time when seen from the Butt Farm Gunsite, from the time of construction to the full maturity of the planting. However, we do not know what the initial light level will be and therefore cannot judge the degree of harm it will cause to the scheduled Gunsite.

The Requirement (Requirement 9 of the DCO [REP1-004]) for submission of detailed design parameters to be agreed by the local planning authority should address our concerns. We would welcome discussion with the local planning authority when detailed design approval is sought.

## **2.9 Question HE 1.23**

**Title: Significance of effects – heavy anti-aircraft gunsite, 350m west of Butt Farm**

***With reference to your comments in 4.8 of your WR [REP1-059], you state that the ‘harm to the significance of the designated site will remain at “major adverse”, and not “minor adverse” as suggested by the Applicants’. Can you clarify if you consider the magnitude of effect on the heritage asset as a result of the Proposed Development to be high adverse or medium adverse with reference to ES Chapter 22 [AS-092, table 22-8]?***

Using table 22-8 [AS-092] Historic England considers that the magnitude of effect on the significance of the designated Butt Farm Gunsite and the wider battery site as a result of the Proposed Development will be ‘medium adverse’. Historic England recognises that the revised footprint proposal for the Converter Stations

represents a considerable alteration from the worst case scenario previously provided by the Applicants. However, the manner in which the site will be 'experienced' will be dramatically altered and diminished by the presence of the proposed Converter Stations.

As we noted in our answer to question 1.7, should subsequent offshore projects be developed which require onshore infrastructure to be located adjacent to the Butt Farm Gunsite, cumulative impacts will arise which will have the potential to intensify the harm to the significance of the monument.

## **2.10 Question HE 1.24**

**Title: Mitigation - heavy anti-aircraft gunsite, 350m west of Butt Farm**

***With reference to your comments [REP1-059, 4.10], which request that the maximum height, footprint, landscaping scheme and precise location of the converter stations should be fixed as part of any DCO, the ExA notes that Requirement 9 of the draft DCO [REP1-004] would secure the maximum height and footprint of the converter stations.***

***Furthermore, the converter stations would be limited to Work Nos. 25A and 26A/ B, and the DAS [REP2-027] states that the converter stations must be located to the south of these areas. The draft DCO [REP1-004] would secure areas of permanent landscaping (Works Nos. 27A/ B, 20A/ B), which are reflected in the indicative landscaping scheme shown in ES Chapter 23 [REP2-024, Figure 23-6]. Does this address your comments regarding securing maximum parameters? If not, how would you want the parameters to be secured through the draft DCO or supporting documents, noting the outline stage of the proposals? If appropriate, can you provide any preferred drafting?***

Historic England is content with the new drafting of Requirement 9 of the draft DCO [REP1-004], which now includes a maximum height and footprint of the Converter Stations. We note the location of the Converter Station set out in the DAS [REP2-027] which is secured by Requirement 9(4). This addresses the concern expressed at paragraph 4.10 of our Written Representation [REP1-059].

In relation to landscaping we would reiterate our previous comments with regard to the landscaping strategy made at [REP1-059, 4.13]; the local planning authority will

need to ensure climate resilient species are selected when landscape management plans are submitted pursuant to Requirement 10. For the avoidance of doubt, we do not seek any further change to the draft DCO in relation to this issue.

#### **2.11 Question HE 1.25**

**Title: Mitigation - heavy anti-aircraft gunsite, 350m west of Butt Farm**

***Given the proximity of the proposed converter stations to the scheduled monument, if a DCO was made, should Historic England be consulted on the detailed design plans that would be submitted to discharge Requirement 9? If not, why not, or if so, how should this be secured? If appropriate, can you provide any preferred drafting.***

Historic England considers that, given the proximity of the proposed converter stations to the nationally important Butt Farm Gunsite, we should be consulted on the detailed design plans submitted to discharge Requirement 9. The local planning authority would remain the decision maker for the purposes of Requirement 9. Historic England would expect this of any similar development adjacent to a scheduled monument, where the level of harm to the significance of the site was as high as in this case.

#### **2.12 Question HE 1.29**

**Title: Enhancements - heavy anti-aircraft gunsite, 350m west of Butt Farm**

***Can you comment on the Applicants' proposed enhancements to interpretation and investigation of the heavy anti-aircraft gunsite [REP1-050, ISH2.10.13]?***

The proposed enhancements of the Butt Farm Gunsite indicated at ISH2.10.13 consist of physical enhancements to the monument, digital 3D model of the gunsite and its integration into interpretation panels and virtual tours, and archaeological and historical research concerning the wider context of the gun site.

The physical enhancement of the gunsite is reliant on agreement from the landowner for permission and access, and scheduled monument consent from the Department for Culture, Media and Sport (DCMS) should it be progressed. Historic England is not aware of any actual or proposed discussion between the Applicants

and landowner to deliver this initiative. The creation of a 3D model is not reliant on access issues, although the production of such a model will require landowner agreement. Historic England is not aware of any actual or proposed discussion between the Applicants and landowner to deliver this initiative. Archaeological and historical research can be undertaken at any time, but it seemed appropriate that the harm generated to the significance of the gunsite by the proposed development could be the motive force to encourage this research activity. Historic England hopes that the proposed cross-project forum could be the mechanism to generate and deliver this research.

Historic England considers that the creation of trails and interpretation panels, whilst beneficial in themselves, fall short of the opportunities presented by this Proposal in the context of numerous energy-related infrastructure development coming forward in the region. This point is made in our written representation [REP1-059 6.4-6.5], and it is hoped that the cross-project forum, to be secured by the OWSI and discussed at 2.14 below, will be identify and make use of these opportunities.

#### **2.13 Question HE 1.30**

**Title: Archaeological mitigation**

***Can you confirm if the Applicants' understanding of your concerns regarding cumulative effects [REP2- 057] are correct? That is, that they were not regarding the EIA CEA, as per the methodology set out in ES Chapter 6 [APP-076] and Appendix 6-1 Onshore Cumulative Effects Methodology [APP-077], but referenced the opportunity for collaboration on landscaping between schemes? If this is not the case, why not, and what further information do you seek to address this concern? Does the Applicants' response [REP2-057] to your comments on Onshore Archaeology and Cultural Heritage [REP1-059] address your concerns regarding these matters? If not, can you explain why and suggest what could be done to resolve them?***

Historic England can confirm that the response provided by the Applicants [REP2-057; REP1-059:4.13] addresses our concerns regarding these matters.

#### **2.14 Question HE 1.31**

**Title: Archaeological mitigation**

***Historic England: Can you comment on the acceptability of the proposed outreach and engagement activities, set out under ISH2.10.14 and ISH2.10.15 [REP1-050], including the Applicants' suggestion that Historic England would need to lead any cross-project forums? Historic England and the Applicants: How would you propose that any outreach and engagement activities could be secured by the draft DCO?***

Historic England met with the Applicants on 5th March 2025 to update the draft Statement of Common Ground. During this meeting, and subsequent email exchange, Historic England and the Applicants agreed that the Public Outreach and Engagement strategy contained within the Outline Onshore Written Scheme of Investigation should be redrafted to include specific tasks and proposals to be clearly set out as an Appendix to that document. In addition, Historic England confirmed that it would organise a cross-project forum at which we would aim to discuss the opportunities to be taken during the lifetime of the Proposal (and other development proposals), but also consider how the archaeological component of the Proposal (and other development proposals) can be used as a mechanism to develop later initiatives as part of the legacy of those projects.

The Applicants have verbally confirmed their readiness to take part in such a forum but have yet to confirm this commitment in writing.

Historic England considers that redrafted Appendix to the Outline Onshore Written Scheme of Investigation can clearly set out the commitment to be undertaken by the Applicants but can also identify those initiatives which the Applicants cannot deliver (because of land ownership issues for example), can be delivered by other partners, or represent legacy opportunities which could be picked up, developed and delivered by other stakeholders. A draft text for the WSI appendix has not been provided to us or submitted to the ExA for consideration or agreement.

**2.15 Question HE 1.32**

**Title: Archaeological mitigation**

***Are you satisfied with the wording of Requirement 18 of the draft DCO [REP1-004]? Do you consider the list of information to be included in***

***18(2) for each scheme to be complete? If not, could you provide details of what additional information you would wish to see included in the list and why?***

Historic England can confirm that that the list of information included in 18(2) of the draft DCO [REP1-004] for the terrestrial and marine aspects of the scheme is complete.

## **2.16 Question MA 1.1**

**Title: Direct impact on potential heritage assets – assessment of significance**

***ES Chapter 17 [APP-133, paragraph 235] acknowledges that, ‘although measures will be taken to reduce, as far as possible, the potential for impact to previously undiscovered heritage assets it is still possible that unexpected discoveries may be encountered during construction’. Paragraph 238 then concludes that, ‘...effects may be considered non-significant in EIA terms (ie anticipated to be no worse than negligible magnitude and minor adverse significance)’. Applicants: How can the impact be assessed as negligible when there remains potential for encounter? Historic England: Do you consider the assessment conclusions to be appropriate? If not, explain why not?***

Historic England raised a similar point within our Written Representation [REP1-059], as we felt the assertion that a residual effect of a direct impact to unknown heritage assets would, in our opinion as a worst case, be considered greater than minor adverse significance (in EIA terms).

It was subsequently explained by the Applicant in The Applicants’ Responses to Written Representations [REP2-057] that through an iterative process of evaluation, investigation and the implementation of appropriate mitigation post-consent, it could be ensured “that no impact would be greater than minor adverse significance” (see responses REP1-059:2.8 and REP1-059:2.9 within this document).

We also discussed this point in detail in a meeting with the Applicant on 5th March 2025. The Applicant described how they would meet this determination of residual

effect from the outlined impact: archaeological input (often specialist in nature) would be required at strategic stages throughout the project in consultation with Historic England – and this would form a principal provision within the framework set out in the Outline WSI (Offshore) [APP-246].

Furthermore, the Outline WSI (Offshore) makes a clear reference to Volume 8, In Principle Monitoring Plan [REP2-043] - building upon the detail in section 17.7 'Potential Monitoring Requirements' of ES Chapter 17 - by stating in paragraph 194 the Applicant's commitment to post-construction monitoring, whereby:

"The timescales and approach [of the post-construction monitoring] to delivery will be discussed in consultation with the project team and the archaeological curators and set out in a method statement for agreement with the archaeological curators. The work will likely include monitoring of AEZs, as well as areas of high archaeological potential, areas of scour, or other areas of interest identified through the pre-construction, baseline surveys."

Therefore, we consider we can accept that the residual effect from a direct impact to an unknown heritage asset could be considered as 'minor adverse significance'. However, we are unsure as to why the ES Chapter 17 makes reference to the impact being "no worse than negligible magnitude". We remain of the opinion this would need to be explained by the Applicant, as this is inconsistent with the determination provided in Table 3-2 'Summary of Potential Likely Significant Effects on Offshore Archaeology and Cultural Heritage' within the Outline WSI (Offshore).

## **2.17 Question MA 1.3**

**Title: Assessment of geophysical data – buffer zone**

***Applicants: ES Appendix 17.2 [APP-136, paragraph 1.1.8] confirmed that, 'survey data were not obtained from the buffer, and only from the corridor itself'. Considering the likely use of jack-up vessels and anchoring events within the construction buffer, and consequently the potential for disturbance to potential heritage assets, can you justify why surveys would not be required for the buffer zone? Do you propose to undertake surveys at a later stage? If so, how are they secured? Historic England: Do you consider detailed surveys should be undertaken for the buffer area? If not, explain why not.***



In our experience of reviewing and commenting on other offshore NSIPs, a marine geophysics survey buffer is not consistently acquired over the export cable route boundary at this stage of a project. However, should the Proposal receive consent, we envisage that through the provisions in the Outline WSI (Offshore) [APP-246] for a high-resolution marine geophysical survey to be carried out along the planned export cable route (with regard to relevant construction activities and a refined design plan footprint), appropriate data coverage to determine seabed features of potential archaeological interest will be attained. To direct this pre-construction survey the Offshore Outline WSI includes the requirement for a method statement to be agreed with Historic England.

## **Appendix A**

Aerial photography, Butt Farm Gunsite, 1946.



## **Appendix B**

Aerial photography, low level oblique, Butt Farm, 1992

