

**RWE Renewables UK Dogger Bank
South (West) Limited**

**RWE Renewables UK Dogger Bank
South (East) Limited**

**Dogger Bank South Offshore
Wind Farms**

**Historic England Statement of Common Ground
(Revision 2)**

Submission for Deadline 4

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Glossary

Term	Definition
CITiZAN Dataset	CITiZAN (the Coastal and Intertidal Zone Archaeological Network) is a national archaeological database
Concurrent Scenario	A potential construction scenario for the Projects where DBS East and DBS West are both constructed at the same time.
Decommissioning Plan	A document which would define the extent of works, in relation to the onshore infrastructure, which are required to be undertaken at the end of the operational lifetime of the Projects. The plan would be subject to agreement with relevant stakeholders at the time.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Impact Assessment (EIA)	A statutory process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, which fulfils the assessment requirements of the EIA Directive and EIA Regulations, including the publication of an Environmental Statement (ES).
Environmental Statement (ES)	A document reporting the findings of the EIA and produced in accordance with the EIA Directive as transposed into UK law by the EIA Regulations.
Expert Topic Group (ETG)	A forum for targeted engagement with regulators and interested stakeholders through the EPP.
In Isolation Scenario	A potential construction scenario for one Project which includes either the DBS East or DBS West array, associated offshore and onshore cabling and only the eastern Onshore Converter Station within the Onshore Substation Zone and only the northern route of the onward cable route to the proposed Birkhill Wood National Grid Substation.
Local Authority	The Local Authority is a body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and the Broads Authority, as set out in Section 43 of the Planning Act 2008. East Riding of Yorkshire Council (ERYC) is the Local Authority for the entirety of the Onshore Development Area.
Outline Onshore Written Scheme of Investigation (WSI)	Project specific document forming the agreement between the Applicants, the appointed archaeologists, contractors and the relevant stakeholders landward of MHWS. The document sets out the methods to mitigate the

Term	Definition
	effects on all the known and potential archaeological Receptors within the Hornsea Four onshore Order Limits.
Planning Inspectorate (PINS)	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects (NSIPs).
Preliminary Environmental Information Report (PEIR)	Defined in the EIA Regulations as information referred to in part 1, Schedule 4 (information for inclusion in Environmental Statements) which has been compiled by the applicants and is reasonably required to assess the environmental effects of the development.
Project Change Request 1	The changes to the DCO application for the Projects set out in Project Change Request 1: Offshore & Intertidal Works [AS-141] which was accepted into Examination on 21 st January 2025.
Project Change Request 2	The changes to the DCO application for the Projects set out in Project Change Request 2: Onshore Substation Zone [AS-152] which was accepted into Examination on 21 st January 2025.
Statutory consultation	The statutory consultation ran in two periods. The first period ran between 6th June and 17th July 2023, with a second period running between 4th August and 15th September 2023 to gather responses from third parties missed during the initial consultation period. The PEIR was presented as part of this consultation.
The Applicants	The Applicants for the Projects are RWE Renewables UK Dogger Bank South (East) Limited and RWE Renewables UK Dogger Bank South (West) Limited. The Applicants are themselves jointly owned by the RWE Group of companies (51% stake) and Masdar (49% stake).
The Projects	DBS East and DBS West (collectively referred to as the Dogger Bank South Offshore Wind Farms).

Acronyms

Acronym	Definition
ANS	Artificial Nesting Structure
CEA	Cumulative Effects Assessment
CoCP	Code of Construction Practise
DBS	Dogger Bank South
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
ETG	Expert Topic Group
ExA	Examining Authority
HDD	Horizontal Directional Drilling
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
RR	Relevant Representation
SoCG	Statement of Common Ground
TCC	Temporary Construction Compounds
WSI	Written Scheme of Investigation

1 Introduction

1.1 Background

1. This Statement of Common Ground (SoCG) has been prepared between RWE Renewables UK Dogger Bank South (West) Ltd and RWE Renewables UK Dogger Bank South (East) Ltd, ('the Applicants') and Historic England to set out the areas of agreement and disagreement between the two parties in relation to the proposed Development Consent Order (DCO) application for the Dogger Bank South ('DBS') West Offshore Wind Farm and DBS East Offshore Wind Farm, collectively known as DBS Offshore Wind Farms (herein 'the Projects').
2. The Application is for development consent for the Applicants to construct and operate the proposed Projects under the Planning Act 2008. Further description of the Projects is available in **Chapter 5 Project Description** [REP1-009].
3. In drafting this SoCG, the Applicants have had regard to the Planning Act 2008 Guidance: Examination stage for Nationally Significant Infrastructure Projects (Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities, 2024).
4. The need for a SoCG between the Applicants and Historic England is set out within the **Rule 6 Letter** [PD-002] issued by the Planning Inspectorate (PINS) on the 24th September 2024 and reiterated in the updated **Rule 6 Letter** [PD-010] issued on 17th December 2024.
5. This SoCG is intended to provide the Examining Authority (ExA) with a clear summary of discussions between the parties and has been structured to reflect topics which are of interest to Historic England, and which have been raised within Historic England's Relevant Representation (RR) [RR-022], and Written Representation (WR) [REP1-059] to the Dogger Bank South Offshore Wind Farms DCO that has been submitted to the Planning Inspectorate pursuant to the Planning Act 2008.
6. It is the intention that this document will facilitate further discussions between the Applicants and Historic England and will provide the ExA with a clear overview of the level of common ground between both parties. This document will be updated throughout the Examination process.
7. The following application documents have informed the discussions with Historic England and address the elements of the Projects that may affect the interests of Historic England:

Table 1-1 - Application Documents of interest to Historic England

Environmental Statement (ES) Chapter / Document	Planning Inspectorate (PINS) Reference
Chapter 4 Site Selection and Assessment of Alternatives superseded by Chapter 4 Site Selection and Assessment of Alternatives (Revision 2)	APP-067 superseded by AS-017
Chapter 17 Offshore Archaeology and Cultural Heritage	APP-133
Chapter 22 Onshore Archaeology and Cultural Heritage superseded by Chapter 22 Onshore Archaeology and Cultural Heritage (Revision 2)	APP-172 superseded by AS-092
Chapter 23 Landscape and Visual Impact	APP-192
Outline Onshore Written Scheme of Investigation	APP-239
Outline Written Scheme of Investigation (Offshore)	APP-246
Outline Code of Construction Practice superseded by Outline Code of Construction Practice (Revision 3)	APP-234 superseded by REP1-025
Geophysical Assessment Report Part 1 – 6	AS-030 to AS-035
Archaeological Trial Trenching Phase 1 (Final) Part 1 to 4	PDA-025 to PDA-028
Archaeological Trial Trenching Phase 2 (Interim) Section 3	PDA-029
Archaeological Trial Trenching Phase 2 (Interim Report) Section 5	AS-023
Archaeological Trial Trenching Phase 2 (Interim Report) Section 6	AS-024
Archaeological Trial Trenching Phase 2 (Interim) Section 10	PDA-031
Archaeological Trial Trenching Phase 2 (Interim) Section 11	PDA-032

Environmental Statement (ES) Chapter / Document	Planning Inspectorate (PINS) Reference
Archaeological Trial Trenching Phase 2 (Interim) Section 17	PDA-030
Phase 2 2024 Archaeological Trial Trenching Technical Note superseded by Phase 2 2024 Archaeological Trial Trenching Technical Note (Revision 2)	PDA-033 superseded by AS-022
Project Change Request 1 - Offshore and Intertidal Works	AS-141
Project Change Request 2 - Onshore Substation Zone	AS-152

8. Historic England and the Applicants have been working so that Historic England may influence and enhance the design of the Projects where appropriate.

1.2 Approach to SoCG

9. This SoCG has been developed during the pre-examination and examination phases of the Projects. In accordance with discussions between the Applicants and Historic England, this SoCG is focused on matters of material interest and relevance to Historic England, namely matters covered in the Application Documents outlined in **Table 1-1** and related topics.
10. The structure of this SoCG is as follows:
- **Introduction:** background to the development of the SoCG.
 - **Consultation and Engagement:** a summary of consultation and engagement with Historic England to date.
 - **Agreement Log:** a record of the Applicants' position alongside Historic England's position. **Table 3-2** to **Table 3-4** sets out those areas agreed in relation to the application documents set out in **Table 1-1**. Where a matter is 'not agreed' or 'under discussion' this is described in further detail in **Table 3-5** to **Table 3-6**.
11. It is agreed that this SoCG is an accurate description of the areas agreed and under discussion between the parties, and that this SoCG accurately records key meetings and consultation with the Historic England.

12. As referenced in **Table 2-1**, the Applicants consulted Historic England on **Project Change Request 1: Offshore and Intertidal Works** [AS-141] and **Project Change Request 2: Onshore Substation Zone** [AS-152] between 15th November and 16th December 2024. Historic England provided consultation comments on 13th December 2024 regarding the Change Requests, and these are set out in **Table 3-2**.

2 Consultation and Engagement

2.1 Introduction

13. Historic England have been consulted on the proposed development throughout the pre-application stage, having engaged in the Site Selection and Assessment Alternatives, Landscape and Visual Impact, and Onshore and Offshore Archaeology and Cultural Heritage Expert Topic Group (ETG) meetings under the Evidence Plan Process, as well as via non-statutory and statutory consultation under Section 42 of the Planning Act 2008.

2.2 Consultation and Engagement Summary

14. **Table 2-1** summarises the consultation that the Applicants have undertaken with Historic England as statutory or non-statutory consultation during the pre-application and post-application phases.

Table 2-1 - Summary of pre-application and post-application consultation with Historic England

Date	Form of Consultation	Meeting Title/ Topic	Summary of Consultation
Pre – Application			
15/09/2021	ETG Meeting	Historic Environment (onshore and offshore) Pre-scoping	The following topics were discussed during the ETG meeting: <ul style="list-style-type: none"> Project Background; EPP; Scoping Report and the approach to the EIA (offshore and onshore); and Site Selection and Methodology.
04/05/2022	ETG Meeting	Site Selection	The following topics were discussed during the ETG meeting: <ul style="list-style-type: none"> Project Update; and Review of site selection work for Creyke Beck.
06/10/2022	Email	Onshore Archaeology	RHDHV shared the Written Scheme of Investigation (WSI) for priority geophysical surveys with Historic England.
11/10/2022	Email(s)	Onshore Archaeology	<ol style="list-style-type: none"> RHDHV received response to the confirm the WSI is with Historic England. Comments were provided to RHDHV by Historic England on the WSI.

Date	Form of Consultation	Meeting Title/ Topic	Summary of Consultation
22/10/2022	ETG Meeting	Onshore Archaeology and Cultural Heritage Geophysics WSI	The following topics were discussed during the ETG meeting: <ul style="list-style-type: none"> Project Update; Update on Scoping Report/Opinion; Update on data collection; Review of programme for collection of data; and Review of geophysics WSI.
13/12/2022	ETG Meeting	Landscape and Visual Impact Assessment	The following topics were discussed during the ETG meeting: <ul style="list-style-type: none"> Project update; and LVIA.
06/01/2023	Email	Onshore Archaeology	RHDHV provided an updated geophysics WSI and onshore heritage strategy document to Historic England.
19/01/2023	ETG Meeting	Onshore and Offshore Archaeology	The following topics were discussed during the ETG meeting: <ul style="list-style-type: none"> Project update; Offshore: <ul style="list-style-type: none"> Update on data collection; and Confirmation of scope for the offshore assessment for ES. Onshore: <ul style="list-style-type: none"> Update on work done; Stakeholder feedback on heritage viewpoints around substation zones; and Stakeholder confirmation on geophysics results.
10/05/2023	ETG Meeting	Historic Environment	The following topics were discussed during the ETG meeting: <ul style="list-style-type: none"> Project Update; and Approach to the DBS geophysical assessment and geoarchaeological assessment.
25/05/2023	ETG Meeting	Onshore Heritage	The following topics were discussed during the ETG meeting: <ul style="list-style-type: none"> Project Update; and

Date	Form of Consultation	Meeting Title/ Topic	Summary of Consultation
		Onshore Archaeology and Cultural Heritage	<ul style="list-style-type: none"> Onshore Archaeology and Heritage Update.
31/05/2023	Email	Onshore Archaeology	Historic England sent confirmation to RHDHV that the WSI for GI watching brief is acceptable once an additional reference is added/
13/06/2023	Email	Offshore Archaeology	RHDHV presented update to Historic England regarding success of Wessex's work on array area assessment and proposed expanding same approach to ECR.
29/06/2023	Email	Onshore Archaeology	RHDHV issued Trial Trenching WSI docs to Historic England for review by 13th July.
12.07.2023	Email	Onshore Archaeology	Historic England provided response to Trial Trenching WSI.
17/07/2023	Section 42 Consultation	Offshore Archaeology and Cultural Heritage	Historic England response to Section 42 consultation on PEIR. See Appendix G of the Consultation Report [APP-044].
21/07/2023	Email	Onshore Archaeology	Historic England confirmed they are satisfied with approach to first phase of trial trenching.
12/09/2023	Email	Export Cable Corridor and Site Selection Report	Issued a report on Offshore Export Cable Corridor & Landfall Site Selection, request comments by 10/10/23.
20/09/2023	Email	Export Cable Corridor and Site Selection Report	RHDHV uses GIS shapefiles for the Offshore Export Cable Corridor and Landfall Site Selection Report.
20/09/2023	ETG Meeting	Offshore Archaeology	<p>The following topics were discussed during the ETG meeting:</p> <ul style="list-style-type: none"> Project update; Seabed feature assessment; Marine geophysical survey – ECR; Results from large data set (Andrew Emery); and PEIR Comments.

Date	Form of Consultation	Meeting Title/ Topic	Summary of Consultation
05/12/2023	ETG Meeting	Onshore Archaeology and Cultural Heritage Onshore Historic Environment	The following topics were discussed during the ETG meeting: <ul style="list-style-type: none"> Project Overview; S42 Consultation response and feedback; ES progress feedback; Programme for ES chapter drafting; and Agreement Logs
14/12/2023	ETG Meeting	Offshore Archaeology Pre-Submission	The following topics were discussed during the ETG meeting: <ul style="list-style-type: none"> Project Design Update; Seabed feature assessment; Palaeolandscape assessment; and WSI.
06/03/2024	Email	Geotechnical Campaign	Correspondence between Historic England and the Applicants on their response on Marine licence application involving seabed sampling for DBS West Array area.
07/03/2024	Email	Onshore Archaeology	The Applicants issued a Draft Onshore Archaeology ES Chapter & Outline Onshore WSI to Historic England, for comment in the meeting 19/03/24.
19/03/2024	ETG Meeting	Onshore Historic Environment Onshore Archaeology and Cultural Heritage	The following topics were discussed during the ETG meeting: <ul style="list-style-type: none"> Project Update; ES update; Feedback on ES and Outline Onshore WSI; and Agreement logs.
22/03/2024	Email	Onshore Archaeology	Historic England responded to the issue of Draft Onshore Archaeology Chapter & Outline Onshore WSI.
13/06/2024	Email	General DCO Submission	The Applicants confirmed DCO was submitted on the 12/06/24, and queried if stakeholders would wish for meetings later in summer to discuss application docs.
Post – Application			

Date	Form of Consultation	Meeting Title/ Topic	Summary of Consultation
23/08/2024	Email	Geophysical Survey Report	The Applicants issued the Interim Update Geophysical Survey Report to Historic England. This provides results on additional areas surveyed since DCO Submission.
09/09/2024	Relevant Representation	Onshore and Offshore Archaeology	Received Historic England's RR to The Planning Inspectorate.
24/09/2024	Email	Phase 1 Trial Trenching final report	The Applicants issued the final version of the Phase 1 Trial Trenching report to Historic England.
30/09/2024	Email	SoCG	A draft of the SoCG and links to the Rule 6 Letter [PD-002] and the document library were shared with Historic England
07/10/2024	Offshore Teams Meeting	SoGC and RR Meeting	The following topics were discussed during the meeting: <ul style="list-style-type: none"> Project Overview; Proposed Changes to the Projects Design Envelope; Statement of Common Ground; RR; and Next Steps.
08/10/2024	Email	Relevant Representation	The Applicants responded to Historic England's RR within The Applicants' Responses to Relevant Representations [PDA-013].
14/10/2024	Onshore Teams Meeting	SOGC and RR Meeting	The following topics were discussed during the meeting: <ul style="list-style-type: none"> Project Overview; Development Consent Order Examination Timetable; Statement of Common Ground; Next Steps; and RR.
17/10/2024	Email	SoCG Meeting	Historic England advised the Applicants that they will not agree or respond to the SoCG until they have submitted their WR and received their first Written Questions from PINS. They advised they will therefore not

Date	Form of Consultation	Meeting Title/ Topic	Summary of Consultation
			meet the deadline for returning comments on the SoCG.
18/10/2024	Site Visit	Site Visit to Butt Farm	<p>Keith Emerick met with the Applicants at Butt Farm. The following matters were discussed:</p> <ul style="list-style-type: none"> Outline the elements of setting that contribute to significance of the Heavy Anti-aircraft gunsite, 350m west of Butt Farm. Mitigation and proposed enhancements / engagement. Kinetic, dynamic and 3rd viewpoints.
23/10/2024	Email	SoCG and Meeting Minutes	The Applicants issued the meeting minutes and presentation from the 14/10/2024 meeting, notes from the site visit on 18/10/2024, and a draft revision of the SoCG, including wording that Historic England will not be engaging in the SoCG process prior to the submission of their WR and receipt of First Written Questions from PINS. A follow up email was sent with a link to the Design and Access Statement [APP-233].
25/10/2024	Email	SoCG	Historic England confirmed they had received the 23/10/2024 email from the Applicants and that they would read the attached and linked documents with interest.
28/11/2025	Email	Project Change Request 2	The Applicants provided an examination update and provided links to information regarding Project Change Request 2: Onshore Substation Zone [AS-152] and requested feedback by the 16/12/2024 and offered a meeting to discuss.
09/12/2024	Email	SoCG meeting minutes	The Applicants issued draft SoCG meeting minutes for the 07/10/2024.
13/12/2024	Letter	Offshore Artificial Nesting Structure (ANS)	Historic England response to request for comments from Interested Parties for Deadline 16th December 2024, raising questions in relation to the ANS site selection process and onshore converter station landscaping.
18/ 12/ 2024	Email	Offshore ANS	The Applicant's provided a brief overview of the ANS AoS site selection process and asked for a

Date	Form of Consultation	Meeting Title/ Topic	Summary of Consultation
			meeting to discuss this and the future ANS consenting route.
09/01/2025	Email	SoCG and Issue Specific Hearing 2	The Applicants shared the new Rule 6 Letter [PD-010], asked whether Historic England would issue a response on the most recent SoCG, and asked whether they were to attend Issue Specific Hearing 2.
09/01/2025	Email	SoCG	Historic England confirmed that they were unlikely to issue a response on the draft revision of the SoCG, pending a decision from their lawyers.
13/01/2025	Meeting	Offshore ANS	Meeting to run through the ANS site selection process, the consenting route for the installation of the ANS and discuss and concerns.
28/01/2025	Email	SoCG	Historic England returned the version of the SoCG issued on 30/09/2024 with their comments. These comments were not incorporated within the revision of the SoCG submitted at Deadline 1 as noted in the covering letter.
17/02/2025	Email	SoCG Meeting	The Applicants invited Historic England to attend a meeting on the 05/02/2025 to discuss the SoCG.
04/03/2025	Email	SoCG	The Applicants issued the SoCG ahead of the 05/03/2025 meeting.
05/03/2025	Meeting	SoCG Meeting	The Applicants met with Historic England to discuss the SoCG with the onshore and offshore specialists.
06/03/2025	Email	Public Benefit Meeting	Historic England contacted the Applicants to request a meeting with AOC Archaeology regarding public benefit.
26/03/2025	Email	Public Benefit Meeting	The Applicants let Historic England know that they believed two meetings were required on cross-project initiatives in response to Historic England's email of 06/03/2025.
28/03/2025	Email	Meeting Minutes	The Applicants shared the minutes from the 05/03/2025 meeting.

Date	Form of Consultation	Meeting Title/ Topic	Summary of Consultation
15/04/2025	Email	SoCG	The Applicants shared the SoCG updated to include relevant documents submitted at Deadline 3 and discussions had at the 05/03/2025 meeting. The Applicants requested comments on the SoCG by 22/04/2025 in order to be included in the version of the SoCG submitted at Deadline 4.
22/04/2025	Email	SoCG	The Applicants reminded Historic England that they required their comments by close of play to be included at Deadline 4.

3 Agreement Log

3.1 Overview

15. The following sections of this SoCG summarise the level of agreement between the parties for each relevant onshore and offshore topic.
16. To easily identify whether a matter is 'agreed', 'not agreed' or 'under discussion', a colour coding system of, red, amber, green, is used respectively within the 'position status colour' column as set out in **Table 3-1**.
17. Where a matter is 'not agreed' or 'under discussion' further detail is provided in section 3.6.

Table 3-1 - Agreement logs position status key

Position Status	Position Status Colour
The matter is considered to be agreed between the parties.	Agreed
The matter is neither 'agreed' or 'not agreed' and is a matter where further discussion is required between the parties, for example where relevant documents are being prepared or reviewed.	Under discussion
The matter is not agreed between the parties, however the outcome of the approach taken by either the Applicants or Historic England is not considered to result in a material impact to the assessment conclusions. Discussions have concluded.	Not agreed – No material impact
The matter is not agreed between the parties and the outcome of the approach taken by either the Applicants or Historic England is considered to result in a materially different outcome on the assessment conclusions.	Not agreed – material impact

3.2 General

Table 3-2 - General Topics agreed, in discussion or not agreed with Historic England

SoCG ID	The Applicants' Position	Historic England's Position	Position Status
EIA – Consultation			
1.	<p>The Applicants have adequately consulted with Historic England throughout all stages of the Projects to date and the summary of Consultation (section 2.2 of this SoCG) is a fair and accurate record of pre-application consultation.</p> <p>Section 2 of this document evidences the engagement and consultation process between the Parties. It is the Applicants' position that Historic England have been appropriately engaged throughout the Application process by the Applicants.</p>	Historic England comment (28/01/2025): <i>"We have been engaged by the applicant, but they are hesitant to engage with us over the issues we have raised – e.g. public benefit."</i>	
2.	<p>Historic England have been adequately consulted on Project Change Request 1: Offshore and Intertidal Works [AS-141] and Project Change Request 2: Onshore Substation Zone [AS-152] which was provided to Historic England as part of a targeted non-statutory consultation exercise on 14/11/2024 by the Applicants.</p>	Historic England confirmed that they have been adequately consulted on the Project Change Requests at the SoCG meeting of 05/03/2025.	
EIA – Site Selection and Assessment of Alternatives			

SoCG ID	The Applicants' Position	Historic England's Position	Position Status
3.	The site selection and route refinement outlined in Chapter 4 Site Selection and Assessment of Alternatives [AS-017] has properly considered the alternatives for the relevant elements of the Projects.	Historic England confirmed in the Onshore Historic Environment (05/12/2023) ETG that they agree with the approach taken to site selection.	
4.	The rationale for the placement of the Onshore Substation Zone as set out in Chapter 4 Site Selection and Assessment of Alternatives [AS-017] is appropriate and acceptable.	Historic England confirmed in the Onshore Historic Environment ETG (05/12/2023) that they agree with the rationale behind the Onshore Substation Zone placement.	
Project Change Requests 1 & 2			
5.	<p>Project Change Request 1: Offshore and Intertidal Works [AS-141] is appropriate and acceptable.</p> <p>The Applicants responded to Historic England's comment noting that any potential offshore artificial nesting structure (ANS) for kittiwake would be applied for under a separate marine licence outside of this DCO application, and that a marine archaeological advisor will be included in the assessment work to support the marine licence application. The Applicants therefore consider this matter agreed.</p>	In their response to the Applicants' request for consultation on Project Change Request 1: Offshore and Intertidal Works [AS-141], Historic England commented " <i>the Applicant ensures their marine archaeological advisor is included in this undertaking</i> " and noted they had no further comments.	
6.	Project Change Request 2: Onshore Substation Zone [AS-152] is appropriate and acceptable.	In their response to the Applicants' request for consultation on Project Change Request 2: Onshore Substation Zone [AS-152], Historic England commented " <i>We agree that the proposed</i>	

SoCG ID	The Applicants' Position	Historic England's Position	Position Status
		<p><i>reduction in scale of the OCS will lead to a reduced potential for effects on buried archaeology and a reduced visual impact when seen from the World War II anti-aircraft gun site at Butt Farm (NHLE 1019186)".</i></p> <p>Historic England's further comments regarding magnitude of effect and landscaping are addressed in points 32 and 47 respectively within this SoCG.</p>	

3.3 Offshore Archaeology and Cultural Heritage

Table 3-3 - Topics agreed, in discussion or not agreed in relation to Offshore Archaeology and Cultural Heritage

SoCG ID	The Applicants' Position	Historic England's Position	Position Status
EIA – Planning and Policy			
7.	All relevant plans and policies have been identified in section 17.4.1 of Chapter 17 Offshore Archaeology and Cultural Heritage [APP-133] and these have been appropriately considered in the assessment.	Historic England agreed for Offshore Archaeology but commented on Onshore Archaeology (28/01/2025) (Table 3-4 , SoCG ID 19) that: <i>"The relevant plans and policies have been identified, but elements of NPS EN-1, such as those paras dealing with public benefit have not been given due weight by the applicant."</i>	

SoCG ID	The Applicants' Position	Historic England's Position	Position Status
EIA – Baseline Environment			
8.	<p>The ES adequately characterises the baseline environment as detailed in section 17.5 of Chapter 17 Offshore Archaeology and Cultural Heritage [APP-133].</p> <p>Discussed and agreed in Historic Environment – Pre-Scoping ETG (14/09/2021). Specifically, the study area, the list of categories of key known and potential heritage assets, and the sources of data which inform the assessment, are suitable to characterise the baseline environment for the purposes of the impact assessment</p>	Historic England confirm in their WR [REP1-059] that they consider that the historic environment has generally been addressed appropriately in this application.	
9.	<p>Sufficient survey data has been collected to inform the assessment as presented within section 17.6 of Chapter 17 Offshore Archaeology and Cultural Heritage [APP-133].</p>	Historic England confirmed in the Historic Environment – Pre-Scoping ETG (14/09/2021) that they agree with the desk-based data collection approach.	
EIA – Assessment Methodology			
10.	<p>The realistic worst case scenario presented in the assessment for the development scenarios, as outlined in Table 17-1 of Chapter 17 Offshore Archaeology and Cultural Heritage [APP-133] are appropriate.</p>	Historic England confirm in their WR [REP1-059] that they accept the Applicants' use of the realistic worse-case scenario approach and specifically that, despite the overall scale of the Proposal offshore, that refinements to the maximum seabed impact (WCS) should enable the developer to incorporate micro-siting options to accommodate any unforeseen events.	

SoCG ID	The Applicants' Position	Historic England's Position	Position Status
11.	The impact assessment methodologies used for the EIA, as presented in section 17.4 of Chapter 17 Offshore Archaeology and Cultural Heritage [APP-133], provide an appropriate approach to assessing potential impacts on the Projects.	Historic England confirmed in the Historic Environment – Pre-Scoping ETG (14/09/2021) that they agree with the approach to the EIA assessment.	
12.	<p>The impacts scoped in for assessment in section 17.6 of Chapter 17 Offshore Archaeology and Cultural Heritage [APP-133] are appropriate and acceptable and Section 17.6.1 and Section 17.6.2 represent a comprehensive list of the potential effects during construction and operation respectively.</p> <p>Historic England did not raise any issues on this subject throughout the ETG process, as part of their Section 42 response, or within their RR or WR. It is therefore considered by the Applicants that the matter is agreed.</p>	Historic England confirmed in the Historic Environment – Pre-Scoping ETG (14/09/2021) that they agree with the impacts scoped in for assessment within the ES.	
13.	<p>The assessment of cumulative effects, as detailed in section 17.8 of Chapter 17 Offshore Archaeology and Cultural Heritage [APP-133] is consistent with the agreed methodologies.</p> <p>Historic England did not raise any issues on this subject throughout the ETG process, as part of their Section 42 response, or within their RR or WR. It is therefore considered by the Applicants that the matter is agreed.</p>	Historic England confirm in their WR [REP1-059] that they consider that the historic environment has generally been addressed appropriately in this application.	

SoCG ID	The Applicants' Position	Historic England's Position	Position Status
14.	<p>The impacts scoped in for assessment in section 17.6 of Chapter 17 Offshore Archaeology and Cultural Heritage [APP-133] are appropriate and acceptable and Section 17.6.1 and Section 17.6.2 represent a comprehensive list of the potential effects during construction and operation respectively.</p> <p>Historic England did not raise any issues on this subject throughout the ETG process, as part of their Section 42 response, or within their RR. It is therefore considered by the Applicants that the matter is agreed.</p>	Historic England confirmed in the Historic Environment – Pre-Scoping ETG (14/09/2021) that they agree with the impacts scoped in for assessment within the ES.	
EIA - Assessment Conclusions			
15.	<p>The conclusions of the assessment of significance as detailed in in section 17.6 of Chapter 17 Offshore Archaeology and Cultural Heritage [APP-133] are appropriate and are considered not significant in EIA terms.</p> <p>With regard to unintended impacts to potential heritage assets (those which are as yet to be identified), the Applicant acknowledges that, in practice, the magnitude of the effect will not be fully understood until after the potential heritage asset has been encountered and the impact has occurred. As such, there is potential for impacts of higher magnitude to occur. However, with the measures set out in the Outline WSI (Offshore) [APP-246] the residual impact can be managed and mitigated to the lowest</p>	Historic England's Deadline 3 Document [REP3-043] confirmed acceptance that, through an iterative process of evaluation, investigation and the implementation of appropriate mitigation post-consent, as set out in the Outline WSI (Offshore) [APP-246], the residual effect from a direct impact to an unknown heritage asset could be considered as 'minor adverse significance'.	

SoCG ID	The Applicants' Position	Historic England's Position	Position Status
	practicable level so that changes in cultural significance are unlikely to be material considerations in the decision-making process. As such, the effects may be considered non-significant in EIA terms (i.e. no worse than minor adverse significance)		
EIA – Cumulative Effects Assessment (CEA) Conclusions			
16.	<p>The conclusions of the CEA as detailed in section 17.8 of Chapter 17 Offshore Archaeology and Cultural Heritage [APP-133] are appropriate and are considered not significant in EIA terms.</p> <p>Separate discussions on the approach to public benefit as this relates to the cumulative impact of several green energy infrastructure projects are being taken forward in conjunction with onshore archaeology and cultural heritage (see SoCG ID 39 below).</p>	Historic England confirm in their WR [REP1-059] that they consider that the historic environment has generally been addressed appropriately in this application.	
Draft DCO / Outline Management Plans / Mitigation and Monitoring			
17.	<p>The Conditions detailed in Marine Licences 1-5 of the Draft Development Consent Order [APP-027] contain appropriate detail with regards to conducting an archaeological written scheme of investigation prior to construction of the Projects.</p> <p>See Table 3-5 for a detailed current position.</p>	<p>Historic England Comment: Please see our submitted Written Representation [REP1-059].</p> <p>See Table 3-5 for a detailed current position.</p>	

SoCG ID	The Applicants' Position	Historic England's Position	Position Status
18.	The Outline Written Scheme of Investigation (Offshore) [APP-246] appropriately details the proposed approach to archaeological investigation and mitigation to be undertaken within the offshore and intertidal areas of the Projects.	Historic England Comment: Please see our submitted Written Representation [REP1-059]. See Table 3-5 for a detailed current position.	

3.4 Onshore Archaeology and Cultural Heritage

Table 3-4 - Topics agreed, in discussion or not agreed in relation to Onshore Archaeology and Cultural Heritage

SoCG ID	The Applicants' Position	Historic England's Position	Position Status
EIA – Planning and Policy			
19.	All relevant plans and policies have been identified in section 22.4.1 of Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092] and these have been appropriately considered in the assessment.	See Table 3-6 for a detailed current position.	
EIA – Baseline Environment			
20.	The ES adequately characterises the baseline environment in of the Onshore Archaeology and Cultural Heritage risks as detailed in	Historic England confirmed in the Onshore Historic Environment ETG (05/12/2023) that they agree with the baseline scope for the ES Onshore Development Boundary,	

SoCG ID	The Applicants' Position	Historic England's Position	Position Status
	section 22.5 of Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092].	including areas that are outside the previous PEIR Development Boundary limits.	
21.	Sufficient survey data has been collected to inform the assessment as presented within section 22.6 of Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092].	Historic England confirmed in the Historic Environment – Pre-Scoping ETG (14/09/2021) that they agree with the approach to the onshore surveys and desk-based data collection.	
EIA – Assessment Methodology			
22.	The study areas identified in section 22.3.2 of Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092] are appropriate.	Historic England confirmed in the Onshore Archaeology – Survey Update ETG (20/10/2022) that they agree with the selection of priority areas identified for further study.	
23.	The realistic worst case scenario presented in the assessment for the development scenarios, as outlined in Table 22-1 of Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092] are appropriate. Historic England did not raise any issues on this subject throughout the ETG process, as part of their Section 42 response, or within their RR [RR-022] or WR [REP1-059]. It is therefore considered by the Applicants that the matter is agreed.		
24.	The embedded mitigation measures in Table 22-3 of Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092] are appropriate.	Historic England confirmed their agreement on this matter in their 28/01/2025 comments on the SoCG.	

SoCG ID	The Applicants' Position	Historic England's Position	Position Status
25.	The impact assessment methodologies used for the EIA, as presented in section 22.4.3 of Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092], provide an appropriate approach to assessing potential impacts of the Projects and the assessment presented is consistent with those assessment methodologies.	Historic England confirmed in the Historic Environment – Pre-Scoping (14/09/2021) that they agree with the approach to the EIA methodology, and in the Onshore Heritage – Onshore Archaeology and Heritage Update ETG (2023). However, Historic England raised concerns with the methodology within their RR [RR-022]. See Table 3-6 .	
26.	Section 22.6.1 of Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092] represents a comprehensive list of the potential effects during construction.	Historic England confirmed their agreement on this matter in their 28/01/2025 comments on the SoCG.	
27.	Section 22.6.2 of Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092] represents a comprehensive list of the potential effects during operation.	Historic England comment (28/01/2025): " <i>Agreed, but Historic England drew attention to the limitations of the assessment of harm to NHLE 1019186 Butt Farm Gunsite in our RR. This is further developed in our Written Reps.</i> " This is considered at Point 32 below.	
28.	The impacts scoped in and assessed in section 22.6 of Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092] are acceptable and appropriate.	Historic England confirmed in the Historic Environment – Pre-Scoping ETG (14/09/2021) that they agree with the impacts scoped in for assessment.	
29.	The EIA assessment set out in Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092] is appropriate and acceptable regarding Onshore Archaeology and Cultural Heritage.	Historic England agreed in their RR [RR-022] the 'assessment of the archaeological resource' set out in the ES provides a 'clear	

SoCG ID	The Applicants' Position	Historic England's Position	Position Status
		<i>basis for directing effective and functioning work packages' in the 'onshore realms'.</i>	
30.	The approach to and objectives of the geophysical surveys, as set out in the Outline Onshore WSI [APP-239] is appropriate and acceptable.	Historic England confirmed in the Onshore Archaeology – Survey Update ETG (20/10/2022) that they agree with the approach to and objectives of the geophysical surveys. Historic England also confirmed in the Onshore Historic Environment ETG (05/12/2023) they agree with the geophysical survey coverage and the effects of availability of access to land.	
31.	The method of consulting the CiTIZAN dataset is appropriate and acceptable.	Historic England confirmed in the Onshore Historic Environment ETG (05/12/2023) that they agree with the method of consulting the CiTIZAN dataset.	
EIA - Assessment Conclusions			
32.	The conclusions of the assessment of significance as detailed in in section 22.6 of Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092] are appropriate and are considered not significant in EIA terms.	Historic England confirmed in their RR [RR-022] that the Onshore Converter Stations represent ' <i>less than substantial harm but on the higher end of the scale</i> ' to the significance of the Scheduled Monument of 'Heavy Anti-aircraft gunsite, 350m west of Butt Farm'. Historic England noted that this high degree of 'harm' needs to be addressed. See Table 3-6 .	
EIA – Cumulative Impacts			

SoCG ID	The Applicants' Position	Historic England's Position	Position Status
33.	The conclusions of the CEA as detailed in section 22.8 of Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092] are appropriate and are considered not significant in EIA terms.	Historic England confirmed in the 14/10/2024 meeting that they do not disagree with the conclusions of the CEA.	
34.	The offshore wind farm projects in the area are having discussions and are taking appropriate measures to ensure a collaborative approach to landscaping.	Historic England provided comments in their RR [RR-022] and WR [REP1-059]. See Table 3-6 .	
Draft DCO / Outline Management Plans / Mitigation and Monitoring			
35.	<p>The wording of Requirement 18 of the Draft DCO [APP-027] is appropriate and acceptable.</p> <p>Historic England did not raise any issues on this subject throughout the ETG process, as part of their Section 42 response, or within their RR [RR-022] or WR [REP1-059]. It is therefore considered by the Applicants that the matter is agreed.</p>		
36.	<p>The Outline Code of Construction Practice (CoCP) [APP-234] includes all relevant mitigation measures specified in Chapter 22 Onshore Archaeology and Cultural Heritage [APP-172] and is appropriate for managing construction impacts from the Projects on ecological receptors.</p> <p>Requirement 19 of the Draft DCO [APP-027] to submit a CoCP to the planning authority for approval post-consent is appropriate.</p>	Historic England confirmed their agreement on this matter in their 28/01/2025 comments on the SoCG.	

SoCG ID	The Applicants' Position	Historic England's Position	Position Status
37.	The approach of including an overarching Trial Trenching section (section 7.3) in the Outline Onshore WSI [APP-239], and to review and approve trenching plans on a rolling basis is appropriate and acceptable.	Historic England confirmed in the Onshore Heritage – Onshore Archaeology and Heritage Update ETG (25/05/2023) that they agree with the approach of including an overarching Trial Trenching section within the Outline Onshore WSI [APP-239] and with reviewing and approving trenching plans on a rolling basis.	
38.	The refined regional research objectives within section 7.3 of the Outline Onshore WSI [APP-239] relating to Trial Trenching are appropriate and acceptable.	Historic England confirmed in the Onshore Historic Environment ETG (05/12/2023) that they agree with the refined regional research objectives within the Outline Onshore WSI [APP-239].	
39.	<p>The approach set out in the Outline Onshore WSI [APP-239] is appropriate and acceptable.</p> <p>The Applicants consider that the surveys carried out pre-application are sufficient to inform the consent decision and the principle of the Outline Onshore WSI [APP-239], which acknowledges [section 7, APP-239] that further archaeological work is required to define the final WSI(s) and sets out a process for this work to be carried out and verified by consultees, including Historic England.</p>	<p>Historic England confirmed in the Onshore Heritage – Onshore Archaeology and Heritage Update ETG (25/05/2023) that they agree with the approach set out in the WSI for Geoarchaeology and Archaeology Watching Brief.</p> <p>Historic England confirmed in their RR [RR-022] that they agree the Outline Onshore WSI [APP-239] 'set(s) out a clear basis for directing effective and functioning work packages'.</p> <p>Historic England also noted that 'additional surveys and evaluation' are required.</p>	

SoCG ID	The Applicants' Position	Historic England's Position	Position Status
40.	The approach to Outreach and Engagement as set out in section 9 of Outline Onshore WSI [APP-239] is appropriate and acceptable.	In their RR [RR-022], Historic England noted that the public outreach and community engagement elements of the project require greater clarification which is set out at Table 3-6 .	
41.	The approach to the Onshore Infrastructure Settings Assessment [APP-178] regarding the Beverley Minster is appropriate and acceptable.	Historic England confirmed in the Onshore Historic Environment ETG (05/12/2023) that they agree with the approach the Settings Assessment takes to Beverley Minster.	
Other Matters as Required			
42.	The approach taken to trial trenching is appropriate and acceptable.	Historic England confirmed in the Onshore Heritage – Onshore Archaeology and Heritage Update ETG (25/05/2023) that they agree with the approach taken to trial trenching.	
43.	The approach to invoking contingency set out in the Trial Trenching WSI (not submitted with the Application) is appropriate and acceptable.	Historic England confirmed in the Onshore Heritage – Onshore Archaeology and Heritage Update ETG (25/05/2023) that they agree with the approach to invoking contingency.	
44.	An interim Trial Trenching Report will be provided to Historic England during the examination process. This is currently being drafted and will be submitted to Historic England during the examination process.	Historic England confirmed in the Onshore Heritage– Onshore Archaeology and Heritage Update ETG (25/05/2023) that they agree this approach is acceptable.	

SoCG ID	The Applicants' Position	Historic England's Position	Position Status
45.	The technicality of reporting and illustrations in Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092] is appropriate and acceptable.	Historic England confirmed in the Onshore Historic Environment ETG (19/03/2024) that they agree with the approach to pre-examination fieldwork.	
46.	The proposed locations of the Temporary Construction Compounds (TCC) and Horizontal Directional Drilling (HDD) compounds at landfall as shown in Figure 5-3 Onshore Development Area Indicative Design [APP-072], are acceptable, and a degree of flexibility on these locations is retained.	Historic England confirmed in the Onshore Historic Environment ETG (05/12/2023) that they agree with the proposed TCC and HDD compound locations and the retention of a degree of flexibility on these locations.	
47.	The approach to pre-examination field work is acceptable and appropriate.	Historic England confirmed in the Onshore Historic Environment ETG (19/03/2024) that they agree with the approach to pre-examination fieldwork.	
48.	Screening by mitigation planting, as set out in section 23.6 and 23.7 of Chapter 23 Landscape and Visual Impact [APP-192] and further detailed in the Outline Landscape Management Plan [APP-236] is sufficient to mitigate the 'less than substantial harm' to views from the Heavy Anti-aircraft gunsite, 350m west of Butt Farm caused by the Onshore Converter Stations.	Historic England note in their RR [RR-022] that more 'naturalistic' planting or 'estate landscape' planting might be more beneficial than screening planting and that consideration should be given to the introduction of horizontal bunding and part of the landscape design. Historic England raised concerns regarding the setting of the Scheduled Monument as set out in Table 3-6 .	
49.	The Archaeology and Cultural Heritage specific viewpoints included in the Onshore Infrastructure Settings Assessment [APP-178]	Historic England noted that their comment on the SoCG (dated 28/01/2025): " <i>Please check</i> " referred to a need to ensure that	

SoCG ID	The Applicants' Position	Historic England's Position	Position Status
	have been agreed with Historic England and are acceptable and appropriate.	the visualisations provided reflected the appearance of the Proposed Development following the Project Change Request.	
50.	The archaeological evaluation in Appendix 22-8 - Interim Archaeological Evaluation Report [APP-189] is acceptable and appropriate and has been carried out in line with the agreed strategy. (wording amended in line with discussions at SoCG meeting of 05/03/2025).	Historic England confirmed that the archaeological evaluation has been carried out in accordance with the agreed evaluation strategy.	

3.5 Status of Discussions for Matters 'Not Agreed' or 'Under Discussion'

3.5.1 Offshore Archaeology and Cultural Heritage

Table 3-5 - Status of discussions relating to Offshore Archaeology and Cultural Heritage

SoCG ID	Discussion Point	Applicants' Position	Historic England's position	Position Status
17.	DCO Protective Provisions	In The Applicants' Responses to Relevant Representations [PDA-013] (RR-022: 1.1.1): <i>'Any potential offshore artificial nesting structure (ANS) for kittiwake would be applied for under a separate marine licence outside of this Development Consent Order (DCO) application. The Applicants can confirm that that any</i>	In their RR [RR-022], Historic England requested that (with regards to the Project-Level Kittiwake Compensation Plan [APP-052] and Guillemot [and Razorbill] Compensation Plan [APP-056]); <i>'the applicant includes in the DCO an obligation to conduct a WSI in relation to the compensation measures</i>	

SoCG ID	Discussion Point	Applicants' Position	Historic England's position	Position Status
		<i>proposals for habitat compensation would include the assessment of effects of any proposed work on the historic environment. It is anticipated that a Written Scheme of Investigation (WSI) for such works would be a condition of the corresponding marine licence and, to this end, a separate WSI for the pre-need to include an obligation to conduct a WSI in relation to the compensation measures. 'construction, construction, operation & maintenance, and decommissioning phases of proposed locations for installation of the ANS would be submitted alongside the marine licence application for the ANS. As such, the Applicants' position is that the DCO does not need to include an obligation to conduct a WSI in relation to the compensation measures.</i>	<i>proposed in the plans referred to above, similar to that contained at Schedules 10 and 11 (15(1)(e)) of the draft DCO'.</i>	
17.	DCO Protective Provisions	<p>The Conditions detailed in Marine Licences 1-5 of the Draft Development Consent Order [APP-027] contain appropriate detail with regards to conducting an archaeological written scheme of investigation prior to construction of the Projects.</p> <p>As stated in The Applicants' Responses to Written Representations [REP2-057] (REP1-059:2.13):</p>	<p>Please see Historic England request for changes within submitted Written Representation (REP1-059) relating to:</p> <p><i>Draft Development Consent Order - Volume 3. Reference: [APP-027] Within the following sections:</i></p> <p><i>Within the following sections:</i></p> <ul style="list-style-type: none"> • <i>Schedule 10, Part 2, 15. -(1) (e) – page 124</i> • <i>Schedule 11, Part 2, 15. -(1) (e) – page 147</i> • <i>Schedule 12, Part 2, 15. -(1) (e) – page 172</i> 	

SoCG ID	Discussion Point	Applicants' Position	Historic England's position	Position Status
		<p><i>'The time scale for the delivery of the archaeological WSI in relation to the offshore Order Limits seaward of Mean High Water Springs (MHWS) is addressed in:</i></p> <ul style="list-style-type: none"> Schedule 10, Part 2, 15 (4); Schedule 11, Part 2, 15 (4); Schedule 12, Part 2, 15 (5); Schedule 13, Part 2, 13 (5); and Schedule 14, Part 2, 11(5). <p><i>which states that:</i></p> <p><i>"Each programme, statement, plan, protocol or scheme required to be approved under condition 15 must be submitted for approval at least six months before the intended commencement of licensed activities, except where otherwise stated or unless otherwise agreed in writing by the MMO."</i></p> <p><i>Because the Marine Management Organisation (MMO) is the responsible body for discharging the relevant conditions (which are listed in the Historic England representation), the Applicants are not obliged to submit a copy of the relevant document to the statutory historic body, nor do the Applicants wish to submit the relevant document to Historic England in advance of the MMO. It will be for the MMO to consult with the statutory historic body as provided for</i></p>	<ul style="list-style-type: none"> Schedule 13, Part 2, 13. -(1) (e) – page 198 Schedule 14, Part 2, 11. -(1) (e) – page 219 <p><i>We request that the wording of the following condition is amended, from:</i></p> <p><i>"an archaeological written scheme of investigation in relation to the offshore Order limits seaward of MHWS, which must accord with the outline written scheme of investigation (offshore) and industry good practice, in consultation with the statutory historic body to include—"</i></p> <p><i>to:</i></p> <p><i>"A written scheme of archaeological investigation in relation to the offshore Order limits seaward of mean high water, which must be submitted to the statutory historic body at least six months prior to commencement of the licensed activities and to the MMO at least four months prior to commencement of the licensed activities and which must accord with the outline marine archaeological written scheme of investigation and industry good practice, in consultation with the statutory historic body to include—"</i></p> <p><i>Given a similar worded condition (as to the one we have above requested) has included a time scale for the delivery of an offshore WSI in the deemed marine licence</i></p>	

SoCG ID	Discussion Point	Applicants' Position	Historic England's position	Position Status
		<p><i>within the condition. The Applicants therefore do not propose to amend the wording of this condition. As such, the Applicants propose that no further amendment is required to the Draft Development Consent Order (DCO).</i></p> <p><i>Following the archaeological assessment of pre-construction survey data and ground-truthing, post consent, once the character, nature and extent of features of possible archaeological interest are more fully understood, appropriate mitigation measures (proportionate to the significance of the asset) to avoid or offset impacts can be determined on a case by case basis (i.e. prior to an impact occurring).'</i></p>	<p><i>conditions of all other offshore wind projects, the reason from departing from this unclear.</i></p>	
18.	Outline WSI (Offshore)	<p>The Applicants' Responses to Relevant Representations [PDA-013] (RR-022: 1.1.3) stated:</p> <p><i>'The Applicants do not agree that the Outline WSI (Offshore) [APP-246] should be updated. Instead, a separate WSI for the pre-construction, construction, operation & maintenance, and decommissioning phases of proposed locations for installation of the ANS would be submitted alongside a separate marine licence application for the ANS.'</i></p> <p>As stated in The Applicants' Responses to Written Representations [REP2-057] (REP1-059:2.11):</p>	<p>Historic England noted in their RR [RR-022] that:</p> <p><i>'However, in general we do consider that the Outline Offshore WSI (APP-239) section 5 'Methodology for Further Site Investigation' presently sets out a clear basis for directing effective and functional archaeological work packages, specifically related to the development of a finalised design plan. Although it is important that each archaeological work package methodology is set out clearly within carefully developed archaeological method statements, these need to be submitted to Historic England in good time prior to work commencing, given they key for addressing project specific development</i></p>	

SoCG ID	Discussion Point	Applicants' Position	Historic England's position	Position Status
		<i>'The Applicants can confirm that that any proposals for ANS installation would include the assessment of effects of any proposed work on the historic environment and that Historic England will be consulted as part of the application process. An introduction to the site selection and planned licencing route for the ANS took place with Historic England on 13th January 2025. Further consultation will take place throughout the Marine Licence application process.'</i>	<i>impacts and potential risks over the entire duration of the project lifecycle.'</i> Historic England noted in their WR [REP1-059] that: <i>'It is apparent Artificial Nesting Structures (ANS) for Kittiwake [APP-052] are to be included as part of the Application – as referenced in the recently submitted document '10.19 Project-Level Kittiwake Artificial Nesting Structure (ANS) Site Selection Report (Revision'01)' [PDB-007, with a separate marine licence application sought for the determined location of such structures. As a result, we request would appreciate being consulted in the planning of possible locations at the earliest opportunity prior to a marine licence application being submitted.'</i>	
18.	Outline WSI (Offshore)	The Applicants consider that this is captured in section 6.4 of the Outline WSI (Offshore) [APP-246] which includes a commitment to the creation of joined-up objectives for investigation and mitigation, including links with academic and industry wide research initiatives, to be established post-consent in consultation with key stakeholders, including Historic England. This would be inclusive of any recently developed or new underwater evaluation techniques, or approaches to archaeological mitigation, that may be available at that time.	Historic England noted in their WR [REP1-059] that: <i>"..opportunities should be taken by the project to test potentially recent or even new underwater evaluation techniques, at the point of producing individual scheme method statements (associated to the project WSI). Statements should emphasise producing knowledge and understanding – based on quality academic input, innovation, and a systematic and sophisticated research designs. As a result, we consider the ES would benefit from including such a commitment, as a positive</i>	

SoCG ID	Discussion Point	Applicants' Position	Historic England's position	Position Status
			<i>contribution to the historic environment (Overarching Planning Statement for Energy EN-1 (November 2023) ("NPS EN-1") para. 5.9.13). The commitment itself could be directed by the Outline Written Scheme of Investigation (Offshore) - Volume 8 [APP-246], whereby incorporating provisions for individual scheme method statements to be carried out in accordance with the latest guidance and advice, and to take advantage of advances in new methods of investigation"</i>	
18.	Outline WSI (Offshore)	The Applicants acknowledge the comment. The Outline WSI (Offshore) [APP-246] includes measures such as archaeological watching briefs (section 5.5) and archaeological diver / ROV based site assessments (sections 5.3 and 5.4), in addition to marine geophysical survey (section 5.1) and geoarchaeological assessment (section 5.2), for example. Archaeological method statements will be produced in order to provide a detailed methodology for each package of development or survey works, for agreement with the archaeological curators. This would be inclusive of joined-up objectives for investigation and mitigation, including links with academic and industry wide research initiatives, and any recently developed or new underwater / nearshore evaluation	Historic England noted in their WR [REP1-059] that: " <i>...due to the Landfall Works HDD options (included within 7.5 Environmental Statement Chapter 5 – Project Description – Volume 7[APP-071]), the WSI should consider coordinating survey and investigation measures to address possible impacts to the remains for towns lost along the Holderness Coast due to sustained coastal erosion. Especially if nearshore access for survey vessels may not be able to utilise techniques conducive to the recording of objects on the seabed that may relate to this potential. Therefore, as the final designs are confirmed discussion with local experts and your marine archaeological contractor, the local authority and Historic England will be important in addressing such potential"</i> .	

SoCG ID	Discussion Point	Applicants' Position	Historic England's position	Position Status
		<p>techniques, or approaches to archaeological mitigation, that may be available at that time.</p> <p>Further to the above, it should be noted that reductions of the offshore engineering scope have also been made which have removed the possibility of an intertidal trenchless transition at landfall. As a result, lower levels of activity in nearshore waters are anticipated. Refer to Project Change Request 1: Offshore and Intertidal Works [AS-141] for the full details of all offshore and intertidal design changes associated with the change request</p>		

3.5.2 Onshore Archaeology and Cultural Heritage

Table 3-6 - Status of discussions relating to Onshore Archaeology and Cultural Heritage

SoCG ID	Discussion Point	Applicants' Position	Historic England's position	Position Status
19.	Planning and Policy	All relevant plans and policies have been identified in section 22.4.1 of Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092] and	Historic England comment (28/01/2025): " <i>The relevant plans and policies have been identified, but elements of NPS EN-1, such as those paras dealing with public benefit have not been given due weight by the applicant.</i> "	

SoCG ID	Discussion Point	Applicants' Position	Historic England's position	Position Status
		<p>these have been appropriately considered in the assessment.</p> <p>Subsequent to HE's comment of 28 January 2025, the Applicant has provided a fuller description of the engagement and outreach offer including proposed on and offsite actions at Butt Farm, reflecting the NPS advice that, 'Applicants should look for opportunities for new development... within the setting of heritage assets, to enhance or better reveal their significance.' (NPS EN-1 5.9.15). This is formally set out in the updated Onshore Outline Written Scheme of Investigation to be submitted at Deadline 4.</p>		
25.	The definitions of importance for cultural heritage assets as set out in the EIA methodology	<p>The ES sets out at Table 22-7 that Grade II listed buildings are considered with other heritage assets of 'regional/national importance', distinguishing them from designated heritage assets 'of the highest significance' which are considered to be of national/international importance [AS-092]. This distinction follows the distinction in NPS sections 5.9.29 to 5.9.30 and NPPF section 206.</p> <p>The Onshore Infrastructure Settings Assessment [APP-178] considers a number of Grade II Listed Buildings (section 22.5.6) and identifies a negligible</p>	<p>Historic England set out in their RR [RR-022] that their position on the EIA methodology set out in section 22.4.3 of Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092] is that they '<i>disagree with elements of the Assessment Methodology identified in Table 22-7, AS-092, and used throughout the Environmental Statement</i>'. Historic England hold the position that '<i>Buildings listed at Grade II are nationally important, not 'Medium' importance</i>'.</p> <p>Whilst Historic England '<i>agree with the 'Definition of magnitude of impact to heritage assets'</i>' as set out in</p>	

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		magnitude of impact to the Grade II listed Black Mill. Even if the valuation of this asset were to be increased to 'high' in line with the Historic England response, this would not result a significant effect.	<p>Table 22-8 of Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092], they hold the position that <i>'because the importance of Grade II buildings has been downgraded, the magnitude of impact and the significance of impact will be distorted accordingly'</i>.</p> <p>At SoCG meeting held on 05/03/2025, Historic England agreed that amending the valuation of Grade II listed buildings to 'High' rather than 'Medium' would not affect the findings of the assessment, a position reiterated in the Historic England response to ExA WQ1.6.</p>	
32.	EIA - Assessment Conclusions	<p>The conclusions of the assessment of significance as detailed in in section 22.6 of Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092] are appropriate and are considered not significant in EIA terms.</p> <p>The Applicants disagree with Historic England's assessment of the magnitude of effect; in that the asset would not be physically affected, any effect would arise from change in its setting, and the interests ascribed by Historic England to the asset would remain largely unchanged even in the absence of landscape mitigation.</p>	<p>Historic England confirmed in their RR [RR-022] that the Onshore Converter Stations represent <i>'less than substantial harm'</i> to the significance of the Scheduled Monument of 'Heavy Anti-aircraft gunsite, 350m west of Butt Farm' but at the high end of this scale. Noting that this high degree of 'harm' needs to be addressed.</p> <p>In their WR, Historic England stated that the presence of the Onshore Converter Station would reduce the open quality of the landscape and hinder understanding of the gun site and that the surface finishes and configuration of the OCS were uncertain</p>	

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		<p>The Applicants note that the exact configuration, location and surface treatments of the proposed Onshore Converter Stations would be defined at detail design stage and a process for developing and agreeing that design is set out in the Design and Access Statement (Revision 2) [REP2-027].</p> <p>The Applicants are engaging with Historic England to resolve these issues. Discussion at the SoCG meeting focused on setting out the mechanism for securing appropriate surface finishes in addition to the Butt Farm enhancement scheme. Landscaping was discussed in the context of SoCG ID 34 below</p>	<p>and would need to be subject to a design approval process.</p> <p>Historic England's responses to the ExA first written questions restated their assessment that harm would equate to 'Medium Adverse', and therefore greater than assessed in the ES, but noted general agreement with Requirements 9 and 10 of the draft DCO, which secure landscape mitigation and appearance/materials of the proposed Onshore Converter Stations via the implementation of the control measures and processes within the Design and Access Statement (Revision 2) [REP2-027].</p>	
34.	Collaboration between offshore wind farm schemes on landscaping	<p>This matter was discussed further at a meeting with Historic England on 14th October 2024 where it was clarified that Historic England's comment was not a reflection of the EIA cumulative effects assessment, as per the methodology set out in Chapter 6 EIA Methodology [APP-076] and Appendix 6-1 Onshore Cumulative Effects Methodology [APP-077] but referenced the opportunity for collaboration on landscaping</p>	<p>At the 14/10/2024 meeting and it was clarified that Historic England's RR [RR-022] comment was regarding the overarching opportunity for collaboration on landscaping between schemes and feel this is an opportunity which has been missed by all schemes in the area.</p> <p>Historic England further commented in their WR [REP1-059] that "<i>the greater understanding of the site as one in a series of power generation sites would allow</i></p>	

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		<p>between schemes, which Historic England felt had been missed by previous schemes in the area.</p> <p>The Design and Access Statement (Revision 2) [document reference 8.8], sets out how the design of the Onshore Substation Zone has been undertaken in a holistic manner with landscape, ecology and historic environment aspects being considered. Strategic planning of energy infrastructure is a matter for central government and is expressed through the policy documents National Policy Statement (NPS) EN-1 and NPS EN-3. The design and landscape proposals for the proposed development have been developed in line with that policy which favours a site-specific response to a number of environmental factors.</p> <p>The Applicants are engaging with Historic England to resolve these issues. Discussion at the SoCG meeting focused on setting out the rationale for the proposed planting and the selection of climate resilient species.</p>	<p><i>the Applicants to see how the landscape around the coal-fired power stations was created to diminish their visual impact and this could produce better landscape design solutions for the current converter station area"</i> and <i>"the Environmental Statement should provide more thorough assessment of the cumulative impact of this and other related energy proposals"</i>. Historic England further noted their preference for the use of 'more naturalistic' or 'estate style' planting and horizontal bunding to better integrate the proposed Onshore Converter Station with the existing historic landscape.</p> <p>Historic England's responses to the ExA first written questions noted general agreement with Requirements 9 and 10 of the draft DCO, which secure landscape mitigation and appearance/materials of the proposed Onshore Converter Stations via the implementation of the control measures and processes within the Design and Access Statement (Revision 2) [REP2-027].</p>	
39.	Section 9 of the Outline Onshore WSI, Public Outreach /	The outreach sections of the Outline Onshore WSI [APP-239] were presented as an initial draft, reflecting the early stage of the proposals.	Historic England set out in their RR [RR-022] their position is that section 9 of Outline Onshore WSI [APP-239] requires ' <i>greater clarification</i> ' and ' <i>the possibilities for wider public benefits are being missed</i> '.	

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	Community Engagement	<p>The Applicants are engaging with Historic England to agree more detailed proposals.</p> <p>Discussion at the SoCG meeting of 05/03/2025 focused on developing a fuller outreach and engagement strategy that reflected a higher level of community engagement, a focus on the links between onshore and offshore archaeological landscapes and enhancements to the Butt Farm site.</p> <p>It was agreed that proposals would be set out in the updated Outline Written Scheme of Investigation to be submitted to the examination at Deadline 4 and would represent a strategy for development into concrete actions post-consent.</p>	<p>Historic England noted in their RR [RR-022] that they 'remain willing to assist the applicant in the formulation of an appropriate outreach and engagement scheme befitting the scale of the project'.</p> <p>Historic England Comment (28/01/2025): "Historic England made comments in their RR about the need to improve the Outreach and Engagement proposal in order to deliver greater public benefit. This has been repeated at all the ETG meetings."</p>	
47.	Mitigation of effects on the Heavy Anti-aircraft gunsite, 350m west of Butt Farm	<p>The screening/planting is only one of a number of proposed mitigation measures. Other mitigation measures are set out in section 22.5.6.3.3 of the Onshore Infrastructure Settings Assessment [APP-178].</p> <p>The options for the final finish of the Converter Stations and associated landscaping are set out in the Design and Access Statement [section 4.3,</p>	<p>Historic England set out in their RR [RR-022] that their position regarding the mitigation planting set out in paragraph 23.6.2.3.1 of Chapter 23 Landscape and Visual Impact [APP-192] onwards and Figures 23-15a2 [APP-193]; Figures 23-15a3 [APP-193] is not an 'effective or lasting mitigation measure in this instance'. Historic England's position is that the harm 'this can be achieved by removing the intervention, reducing its impact, or finding ways to mitigate that harm'.</p>	

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		<p>APP-233] and would be agreed through a design review process post consent [section 5, APP-233].</p> <p>Mitigation for the Butt Farm site also includes proposals for interpretation and investigation of the site which have been shared with Historic England. The Applicants carried out a site visit with Historic England (18/10/24) to further refine proposals for enhancement of the asset, which were presented to Historic England in writing following the meeting.</p> <p>The Applicants are engaging with Historic England to resolve these issues. Discussion at the SoCG meeting held on 05/03/2025 focused on setting out the rationale for the proposed planting and the selection of climate resilient species.</p>	<p>Historic England's responses to the ExA first written questions noted general agreement with Requirements 9 and 10 of the draft DCO, which secure landscape mitigation and appearance/materials of the proposed Onshore Converter Stations and set out specific comments on proposals for outreach and engagement.</p>	

4 Summary

18. This SoCG has outlined the consultation that has taken place between the Applicants and Historic England during the pre-application and pre-examination phases. This SoCG will be updated as discussions progress and made available to PINS as requested through the DCO examination phase.

5 References

Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities (2024). Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects. Available at: <https://www.gov.uk/guidance/planning-act-2008-examination-stage-for-nationally-significant-infrastructure-projects>. [Accessed August 2024].

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