



**RESPONSES TO EXAMINING AUTHORITY'S  
QUESTIONS 13/05/2025 (ExQ2)  
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.

## **2.0 HISTORIC ENGLAND'S RESPONSES TO THE QUESTIONS**

### **2.1 Question DCO.2.2**

**Title: Deemed Marine Licence 1-5 conditions - archaeological Written Scheme of Investigation (WSI)**

*In your DL1 submission [REP1-059] you raised concerns with regard to the proposed wording of the conditions relating to the archaeological WSI (offshore). The applicants' DL2 response [REP2-057] explained why they are not minded to amend the wording of the conditions. The SoCG [REP4-061] suggests this is still an outstanding matter, therefore, clarify whether you agree with the applicants' explanation? If not, explain why not and how this could be resolved.*

We have carefully reviewed the matter and have concluded that as the DCO still requires submission of the final Offshore WSI to the MMO six months before commencement, this point is resolved.

### **2.2 Question HE.2.5**

**Title: Archaeology**

***Do you have any comments regarding the Phase 2 Archaeological Evaluation Trenching Report [REP4-089 and REP4-090] submitted at DL4?***

We are still reviewing the content and will be in a position to respond by the next deadline date (Deadline 6, 13<sup>th</sup> June, 2025).

**2.3 Question: HE 2.8**

**Title: Anti-aircraft gunsite at Butt Farm.**

***Provide comments on the applicants' responses to your comments in response to ExQ1 HE.1.16 and HE.1.21 [REP4-087]***

We note the responses provided by the applicant in response to HE.1.16 and HE.1.21

HE.1.16: We maintain that it is not clear what archaeological remains may survive within the Order Limits, but we recognize that what may survive will be insubstantial. The aerial photography provided by Historic England indicates that features, admittedly ephemeral, related to the scheduled site survived into the modern period.

We therefore drew attention to those features in order to indicate the original size and developed scale of the Butt Farm gunsite. However we agree with the applicant that the majority of structural elements are outside the Order Limits.

HE.1.21: We consider that the clarification now provided by the applicant is acceptable. We would however ask the Examining Authority to note that the Butt Farm gunsite is extremely rare and a key site in the development of defensive infrastructure.

**2.4 Question HE 2.10**

**Title: Effects on the significance of the anti-aircraft gunsite at Butt Farm**

***The ExA notes your response to action point 31 from ISH4 [REP4-109]. However, confirm if you consider whether an effect on the significance of a heritage asset is the same or different to a loss (including any***

***partial loss) of the significance of a heritage asset. Provide this answer with reference to your comments regarding the effects of the proposed development on the setting of the anti-aircraft gunsite at Butt Farm.***

‘Effects’ can be positive or negative. We consider that the ‘effect’ on the significance of the Butt Farm gunsite generated by the proposed Onshore Converter Station (OCS) will be ‘negative’. The significance of a place is the sum of the values attached to it by people: significance defines what a place means to us *now*. The Historic England *Conservation Principles* (2008) identifies four value groups: Evidential (what we can find out about a place), Historical (what we know about a place), Aesthetic (how a place makes us feel) and Communal (who values the place and why). The *Conservation Principles* document was produced for Historic England use, but is widely used by other parties for the positive management of the historic environment.

We agree with the applicant that there will be no physical impact on the scheduled monument, and therefore there will be no need for archaeological mitigation and therefore there is no harm to the Evidential value of the scheduled site. However, should it be possible to carry out archaeological evaluation of the gunsite as part of any public engagement or outreach work in the manner suggested by Historic England in RR-022 and Written Representations, some of the Evidential value attached to the site could be *realised*. We know a great deal about the Historical value of the site, in both its *associative* and *illustrative* components, and again the proposed OCS and associated works will not have a negative impact on the Historical value. However, we consider that the Historical value could be *enhanced* by public engagement and community outreach works (as above). The biggest negative impact on the significance of the scheduled monument will be the diminution of the Aesthetic value, generated by the presence of the OCS. Both we and the applicant agree that setting contributes to the significance of the Butt Farm gunsite. The proposed OCS is a large, prominent feature in the setting of the monument; it will change the setting, making it more limited and constrained: it will feel and look diminished, and the way we experience the scheduled site will change. The Communal value of the site is harder to calculate. There are people who have a close attachment to the

gunsite, and care deeply about the structures and its history. There are people who are regular users of the adjacent camp site, who are drawn to it by its history and structures, as well as the open aspect. The construction and presence of the OCS will therefore have some negative impact on the Communal value. However, as is the case with Historical value, we consider that the Communal value can be *enhanced* through public benefit, outreach and engagement works.

On the basis of this assessment of impact and significance, we remain of the view that the OCS will constitute 'less than substantial harm' to the significance of the scheduled gunsite. There will be loss to the Aesthetic value, and loss to the Communal value, but the loss to the Aesthetic value will be greater.

## **2.5 Question HE 2.12**

**Title: Effects on the setting of the anti-aircraft gunsite at Butt Farm**  
***With reference to updated figure 23-15a4 Cultural Heritage Viewpoint 2: Anti Aircraft Battery at Butt Farm [REP4-039] showing part of the proposed access road to the converter stations, given the proximity of the access road to the scheduled monument, is the access road and the proposed landscaping either side of it likely to create a sense of enclosure around the gunsite? If so, what effect would this have on the setting of the heritage asset?***

We have reviewed the updated figure 23-15a4 (REP4-039) and consider that the proximity of the proposed access road and its suggested landscaping will increase the sense of enclosure in this part of the site. This will add to the sense of enclosure generated by the OCS to the south of the scheduled gunsite and will therefore add to the diminution of the Aesthetic value.

Because planting is subject to seasonal change, it does not form a permanent barrier, and therefore the road and movement along it will be visible from the scheduled site.

## **2.6 Question HE 2.14**

**Title: Detailed design of the converter stations**

***The ExA notes your DL3 response [REP3-043] and request to be consulted by ERYC on the detailed design plans which would be submitted to the Local Planning Authority to discharge requirement 9 of the draft DCO, if development consent was granted for the proposed development. The applicants have however proposed that Historic England be consulted during an earlier stage of the design review process (see [REP4-096] action point 24 page 27). Provide a view on this suggestion.***

We can confirm that we have discussed this matter with the applicant on 20<sup>th</sup> May 2025 and have agreed that the proposal to consult Historic England during an earlier stage of the design review process is acceptable to us. As this can be agreed, a provision should be made in the DCO for this to be secured as a requirement.

**2.7 Question HE 2.15**

**Title: Public outreach / community engagement strategy**

***Provide a view of the public outreach/ community engagement strategy in appendix 3 of the outline Onshore Written Scheme of Investigation [REP4-048]. In your view, should any amendments be made to these, and if so what and why? What weight should be offered to the proposed enhancements as 'public benefits' given their outline nature, notably regarding the anti-aircraft gunsight nearby to Butt Farm?***

Historic England welcomes the public outreach / community engagement strategy set out by the applicant in Appendix 3 of REP4-048. We consider that if adequately resourced and initiated these proposals could deliver lasting 'heritage benefits'.

We recognise that not all the ideas proposed by Historic England and identified in REP4-048 can be delivered by the applicant, owing to the privately owned nature of the site. Similarly we accept that not all the ideas can be delivered during the life of the project build, but will be 'legacy' projects, which will in turn rely on the enthusiasm of local curators and the public to sustain engagement.

Historic England will meet with the applicant, agents and local curators on 22<sup>nd</sup> May in order to discuss this issue, and seek solutions, and thereafter host a series of meetings in order share knowledge and experience between the several NSIP projects in this geographic area, with the aim of delivering better, more engaged cultural heritage practice.

The strategy presented in REP4-048 needs to strike a balance between initiatives which treat the public as a passive audience receiving information from experts, and those initiatives which are about genuine engagement, co-creation and participation. To this end the public information aspect of the first half of the strategy could also serve as the mechanism to identify what it is that people might be interested in and what projects or ideas they might want to initiate.

The suggested enhancements of the Butt Farm gunsite are very welcome and positive. Again there are opportunities here to deliver more, by, for example, using any conservation work as a training exercise in the conservation of modern materials. This would enhance the public benefit through conservation of the fabric and the increased experience for conservation practitioners.

Historic England considers that there are considerable possibilities, opportunities and public benefits in the proposed strategy, and we are keen to work with the applicant and other partners to give definition and certainty to the presently outline proposals. Subject to the outcome of those discussions, an update will be provided.

## **2.8 Question MA 2.2**

**Title: Public outreach and engagement**

***Public outreach and engagement Do you consider the initiatives to deliver public benefits in relation to the offshore elements of the proposed development as set out in the outline Written Scheme of Investigation (oWSI) (offshore) [APP-246] and the updated oWSI (onshore) [REP4-048] to be appropriate? If not, explain any outstanding requirements.***

We are of the opinion that through the provision of the Outline Offshore WSI and reference C020 of the Commitments Register (REP2-025) opportunities

to realise public benefit from the project will be established post-consent in consultation with key stakeholders, including Historic England.

## **2.9 Question MA 2.3**

**Title: Preservation by record**

***In your DL1 submission [REP1-059], you raised concerns with the terminology 'preservation by record'. The applicants' DL2 response [REP2-057] sought to explain why the use of the terminology would be appropriate in this instance. Are you content with the explanation given? If not, explain why not.***

In a meeting with the Applicant and their consultants on 5th March 2025 we discussed this specific point and are therefore content with the broader meaning of how recording material of archaeological interest that is to be impacted by the project can go some way to preserving a site, object or features material integrity.

In more specific terms, we consider the content of the Outline WSI Offshore (APP-246) section 5.4 provides a good starting point for focusing archaeological investigations on heritage assets that pose a development constraint. Through schemes of evidence gathering for the purposes of interpretation and advance understanding of significance – not simply on 'recording' alone.

Furthermore, we consider the provision of utilising archaeological specialists as part of the survey team on board (ROV) or in the water (Diver) - as alluded to in paragraph 136 - may be invaluable. Providing us confidence that any such investigations have the prospect to develop a full appreciation of the research potential of a site.

This is a provision we would therefore wish to see translated, and elaborated upon where possible, into a finalised Offshore WSI – should consent be granted.

## **2.10 Question MA 2.4**

**Title: oWSI (offshore) for artificial nesting structures (ANS)**



***The SoCG [REP4-061] suggests outstanding concerns in relation to the provision of WSIs for the installation of ANS. Do you consider the applicants' proposal for separate WSIs (offshore) for the pre-construction, construction, operation and maintenance, and decommissioning phases for the proposed locations for installation of the ANS (or any other compensation measures) alongside separate deemed marine licences to be appropriate? If not, explain why not.***

It has been agreed that a separate WSI (marine) will be produced to support marine licence application for the any Artificial nesting Structures, and Historic England will be consulted on its content.

#### **2.11 Question MA 2.5**

**Title: Underwater evaluation techniques**

***Your DL1 submission [REP1-059] suggests the provision of a commitment, directed by the oWSI (offshore) to test recent or potentially even new underwater evaluation techniques. The applicants' response at DL2 [REP2-057] argues that this is already captured as part of the oWSI (offshore) [APP-246, Section 6.4]. Do you consider the information already provided to be sufficient? If not, explain any outstanding concerns.***

We are of the opinion that the response provided by the Applicant on this matter is sufficient. It is important that there is provision for agreement being sought from the archaeological curators for archaeological method statements produced prior to survey or construction work within the Outline Offshore WSI.

#### **2.12 Question MA 2.6**

**Title: Survey Co-ordination – Holderness Coast**

***You noted in your DL1 submission [REP1-059] that the WSI should consider coordinating survey and investigation measures to address possible impacts on the remains of towns lost along the Holderness Coast due to sustained coastal erosion. The applicants provided a detailed response at DL2 [REP2-057] to address this matter. Do you agree with the applicants' response? If you do not, explain why not.***

In a meeting with the Applicant and their consultants on 5th March 2025 we discussed this specific point. We accept that through the provision of the Outline Offshore WSI (APP-246) this area of seabed can be investigated utilising an archaeological method statement (with specialist local archaeological input) in a suitable timeframe prior to construction.