



**RESPONSES TO EXAMINING AUTHORITY'S
QUESTIONS 07/07/2025 (ExQ5)
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 has been submitted in response to the ExA questions of 07/07/2025.

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 01

Title: Onshore Historic Environment

Confirm at what level of the scale of less than substantial harm you consider there would be, as a result of the proposed development, to the anti-aircraft gunsite scheduled monument nearby to Butt Farm – this is not clear from the signed Statement of Common Ground [REP8-017]. Set out what you consider the level of harm to be on the scale during construction, year 1 of operation and year 10 of operation.

In our response to ExAs Second Written Questions (**REP5-046**) we set out our assessment of the significance of the Butt Farm Gunsite (answer to Question HE2.10) We stated that '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.' This led to our assessment that the impact of the proposal on the significance of the Butt Farm Gunsite would be 'less than substantial harm'.

When we considered the first iteration of the proposed OCS, it was our judgement that the 'worst case scenario' two OCS building configuration represented less than substantial harm, but at the higher end of that scale (**RR-022**). However, the Applicants submitted an amended OCS scheme consisting of a single OCS unit. We revised our judgement stating that the impact on significance would remain 'less than substantial harm'(**REP4-109**).

We consider that during construction of the OCS and access road, the impact on significance will constitute less than substantial harm, but at the higher end of that scale. This higher level of harm will be generated through the increased activity, noise and disturbance which will diminish the experience of being on the Gunsite. However, this activity and level of harm will be temporary in nature.

It remains our judgement that planting does not equate to screening, owing to its seasonal nature and susceptibility to disease and loss through wind action. Although the Applicants have submitted a revised scheme for a smaller footprint OCS site, we still consider that this is a large, physical intervention into the landscape and on the setting of the scheduled Gunsite. As a consequence we do not consider that there will be any substantive change between Years One and Ten of operation and maintain that the OCS will represent 'less than substantial harm' to the significance of the Butt Farm Gunsite. We acknowledge the outreach and public engagement as benefits secured by the Written Scheme of Investigation and leave the balance/weighing to the ExA.

We note that the final planting scheme will be approved post-consent and have welcomed the statement that we will be consulted as part of the Design Review Panel.

Question 02

Title: Onshore Historic Environment

The signed Statement of Common Ground [REP8-017] suggests (SoCG ID 47) that regarding mitigation of effects on the heavy anti-aircraft gunsite, nearby to Butt Farm, all that is left to resolve is a mechanism for

the enhancement measures to be finalised and implemented – do you foresee being able to reach agreement on this? If not, why not?

Historic England and the Applicant have discussed this matter on 08/07/25. Both parties agree that Appendix 3 of the Onshore Written Scheme of Investigation [REP4-049], as secured through draft DCO Requirement 18, will develop the Public Outreach / Community Engagement Strategy on which Historic England will be consulted.

The Onshore Written Scheme of Investigation also identifies enhancement and engagement works relating to Butt Farm, including physical enhancement proposals. The ability to carry out elements of these proposals is dependent on (among other things) the permission of the landowner and Scheduled Monument Consent being granted by the Secretary of State. Therefore, it is not possible for the parties at this stage to agree a full and final set of enhancement works or a timescale by which they will be implemented. Nevertheless, discussions to date have shown that the Applicants and Historic England are all broadly aligned on the potential scope of these enhancement works.

For the avoidance of doubt, both the Applicants and Historic England are content that Requirement 18 and the Onshore Written Scheme of Investigation appropriately secures the provision of public outreach and community engagement strategies.