

**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 4) (Tracked)**

Submission for Deadline 9

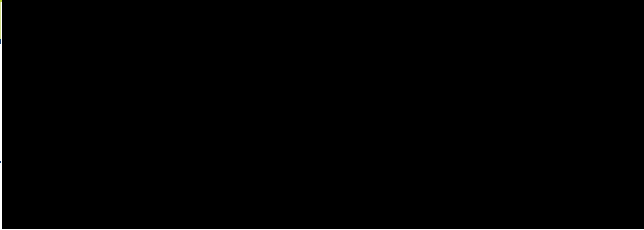
Document Date: July 2025

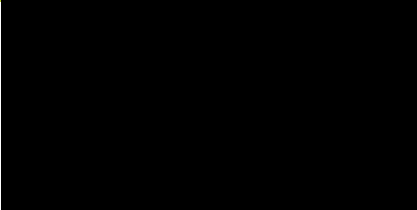
Document Reference: 9-4

Revision Number: 04

Classification: Unrestricted

| | | | | | |
|--|---|------------------------------|----------------------------|------------|-------------|
| Company: | RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited | Asset: | Development | | |
| Project: | Dogger Bank South Offshore Wind Farms | Sub Project/Package | Consents | | |
| Document Title or Description: | Historic England Statement of Common Ground (Revision 4) (Tracked) | | | | |
| Document Number: | 005368457-04 | Contractor Reference Number: | PC2340-RHD-ZZ-ZZ-RP-Z-0159 | | |
| <p><i>COPYRIGHT © RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited, 2025.</i></p> <p><i>All rights reserved.</i></p> <p><i>In preparation of this document RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited has made reasonable efforts to ensure that the content is accurate, up to date and complete for the purpose for which it was prepared.</i></p> | | | | | |
| Rev No. | Date | Status/Reason for Issue | Author | Checked by | Approved by |
| 01 | 29/01/2025 | Submission for Deadline 1 | RHDHV | RWE | RWE |
| 02 | 25/04/2025 | Submission for Deadline 4 | RHDHV | RWE | RWE |
| 03 | 03/07/2025 | Submission for Deadline 8 | Haskoning | RWE | RWE |
| 04 | 10/07/2025 | Submission for Deadline 9 | Haskoning | RWE | RWE |

| Signatories | |
|--------------|--|
| Signed |  |
| Name | |
| Position | Head of Advice North |
| On behalf of | Historic England |

| Signatories | |
|--------------|---|
| Signed |  |
| Name | |
| Position | Senior Consents Manager |
| On behalf of | RWE Renewables UK Dogger Bank South (West) Ltd and RWE Renewables UK Dogger Bank South (East) Ltd |

Contents

| | | |
|-------|--|----|
| 1 | Introduction | 9 |
| 1.1 | Background | 9 |
| 1.2 | Approach to SoCG | 12 |
| 2 | Consultation and Engagement | 13 |
| 2.1 | Introduction | 13 |
| 2.2 | Consultation and Engagement Summary | 13 |
| 3 | Agreement Log | 23 |
| 3.1 | Overview | 23 |
| 3.2 | General | 24 |
| 3.3 | Offshore Archaeology and Cultural Heritage | 27 |
| 3.4 | Onshore Archaeology and Cultural Heritage | 32 |
| 3.5 | Status of Discussions for Matters 'Not Agreed' | 42 |
| 3.5.1 | Onshore Archaeology and Cultural Heritage | 42 |
| 4 | Summary | 50 |
| 5 | References | 51 |

Tables

| | |
|--|----|
| Table 1-1 - Application Documents of interest to Historic England..... | 10 |
| Table 2-1 - Summary of pre-application and post-application consultation with Historic England | 13 |
| Table 3-1 - Agreement logs position status key..... | 23 |
| Table 3-2 - General Topics agreed or not agreed with Historic England | 24 |
| Table 3-3 - Topics agreed or not agreed in relation to Offshore Archaeology and Cultural Heritage | 27 |
| Table 3-4 - Topics agreed or not agreed in relation to Onshore Archaeology and Cultural Heritage | 32 |
| Table 3-5 - Status of discussions relating to Onshore Archaeology and Cultural Heritage | 42 |

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. |

| Term | Definition |
|---|---|
| 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 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 (Revision 4)** [REP7-032].
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 has been 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 3) | APP-067 superseded by REP7-028 |
| Chapter 17 Offshore Archaeology and Cultural Heritage (Revision 2) | APP-133 superseded by REP7-062 |
| Chapter 22 Onshore Archaeology and Cultural Heritage superseded by Chapter 22 Onshore Archaeology and Cultural Heritage (Revision 3) | APP-172 superseded by REP7-073 |
| Chapter 23 Landscape and Visual Impact (Revision 2) | APP-192 superseded by REP7-090 |
| Outline Onshore Written Scheme of Investigation superseded by Outline Onshore Written Scheme of Investigation (Revision 2) | APP-239 superseded by REP4-048 |
| Outline Written Scheme of Investigation (Offshore) | APP-246 |
| Outline Code of Construction Practice superseded by Outline Code of Construction Practice (Revision 5) | APP-234 superseded by REP7-105 |
| 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 |

| Environmental Statement (ES) Chapter / Document | Planning Inspectorate (PINS) Reference |
|--|---|
| Archaeological Trial Trenching Phase 2 (Interim) Section 11 | PDA-032 |
| 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 |
| Phase 2 Archaeological Evaluation Report (Final) | REP ₄ -089 and REP ₄ -090 |
| 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' this is described in further detail in **Table 3-5**.
11. It is agreed that this SoCG is an accurate description of the areas agreed and not agreed 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, requestion 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. |

| Date | Form of Consultation | Meeting Title/ Topic | Summary of Consultation |
|---------------------------|-------------------------|--------------------------------------|---|
| Post – Application | | | |
| 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 | SoCG 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 |

| Date | Form of Consultation | Meeting Title/ Topic | Summary of Consultation |
|------------|----------------------|---|---|
| | | | PINS. They advised they will therefore not meet the deadline for returning comments on the SoCG. |
| 18/10/2024 | Site Visit | Site Visit to Butt Farm | Keith Emerick met with the Applicants at Butt Farm. The following matters were discussed: <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. |

| Date | Form of Consultation | Meeting Title/ Topic | Summary of Consultation |
|--------------|----------------------|-----------------------------------|---|
| 18/ 12/ 2024 | Email | Offshore ANS | The Applicants provided a brief overview of the ANS AoS site selection process and asked for a 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. |

| Date | Form of Consultation | Meeting Title/ Topic | Summary of Consultation |
|------------|----------------------|---|---|
| 28/03/2025 | Email | Meeting Minutes | The Applicants shared the minutes from the 05/03/2025 meeting. |
| 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. |
| 20/05/2025 | Meeting | ExA WQ2 | The Applicants met Historic England to discuss responses to the ExA Second Written Questions and identify areas of common ground. |
| 21/05/2025 | Email | Evaluation reporting | The Applicants supplied links to Phase 2 evaluation reporting on the Examination document library to Historic England. |
| 22/05/2025 | Meeting | Cross Project Engagement and Outreach Forum meeting | Discussion of the composition and terms of reference of a cross-project forum for archaeological outreach and engagement relating to infrastructure projects in the Humber region. |
| 29/05/2025 | Email | Evaluation Reporting | Historic England provided comments on the Phase 2 evaluation reporting, noting general agreement with the recommendations, noting specific areas of potential further study and noting some minor corrections/amendments. |
| 04/06/2025 | Meeting | Butt Farm Enhancements | Site meeting with Historic England, the Butt Farm tenant and an individual who runs historical tours of Butt Farm Anti-Aircraft gun battery to discuss physical interventions aimed at consolidating and enhancing the surviving remains at Butt Farm |
| 10/06/2025 | Email | Butt Farm – access road landscaping treatment | Email to Historic England and East Riding of Yorkshire Council to discuss potential treatments of the access road to minimise any sense of enclosure following ISH6. The |

| Date | Form of Consultation | Meeting Title/ Topic | Summary of Consultation |
|-------------------|----------------------|---|--|
| | | | Applicants requested Historic England's views on preferences for hedge or fence. |
| 10/06/2025 | Email | Butt Farm – access road landscaping treatment | Historic England responded to the request, indicating a preference for planting and seeking confirmation that any lighting, signage or other street furniture be minimised and that planting explicitly considered climate change resilient species. |
| 19/06/2025 | Email | SoCG | The Applicants issued Revision 3 of the SoCG and asked Historic England if they could confirm which of the remaining under discussion matters were agreed or not agreed considering discussions and the documents submitted Deadline 6. |
| 25/06/2025 | Email | SoCG | Historic England returned a tracked changed version of the SoCG with comments relating to Offshore Archaeology and Cultural Heritage and stated no further comments on Onshore Archaeology and Cultural Heritage. |
| 26/06/2025 | Email | SoCG | The Applicants returned the SoCG in consideration of Historic England's comments and requested they sign the SoCG. |
| 02/07/2025 | Email | SoCG | Historic England returned a version of the SoCG stating that items 19, 25, and 32 were now agreed and commented on the remaining not agreed items. |
| 02/07/2025 | Email | SoCG | The Applicants returned the updated SoCG including Historic England's comments for signing. |
| 03/07/2025 | Email | SoCG | Historic England returned the signed SoCG with three not agreed matters remaining. |
| <u>08/07/2025</u> | <u>Email</u> | <u>SoCG</u> | <u>The Applicants issued Revision 4 of the SoCG post the ExA's Rule 17 letter.</u> |
| <u>08/07/2025</u> | <u>Meeting</u> | <u>SoCG and Rule 17</u> | <u>Meeting to discuss responses to Rule 17 letter and updates required to SoCG to be submitted at Deadline 9</u> |
| <u>09/07/2025</u> | <u>Email</u> | <u>SoCG</u> | <u>Historic England provided written comments on the SoCG post the 08/07/2025 meeting.</u> |

| Date | Form of Consultation | Meeting Title/ Topic | Summary of Consultation |
|-----------------------------------|--------------------------------|-----------------------------|--|
| <u>09/07/2025</u> | <u>Meeting</u> | <u>SoCG</u> | <u>The Applicants and Historic England had a further meeting on the SoCG to discuss Historic England's comments.</u> |
| <u>09/07/2025</u> | <u>Email</u> | <u>SoCG</u> | <u>The Applicants issued an updated Revision 4 of the SoCG for Historic England to sign.</u> |
| <u>09/07/2025</u> | <u>Email</u> | <u>SoCG</u> | <u>Historic England returned the signed SoCG with four matters not agreed.</u> |

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 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> | <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></p> <p>Historic England clarified at the meeting held to discuss responses to ExA WQ2 on 20/05/2025 that their comments related to their view of the Applicants engagement with policy on public benefit (discussed at SoCG ID. 19 and 40 below) rather than any lack of engagement with Historic England during the application process.</p> | |
| 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> | <p>Historic England confirmed that they have been adequately consulted on the Project Change Requests at the SoCG meeting of 05/03/2025.</p> | |

| SoCG ID | The Applicants' Position | Historic England's Position | Position Status |
|--|---|---|-----------------|
| EIA – Site Selection and Assessment of Alternatives | | | |
| 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. | |

| SoCG ID | The Applicants' Position | Historic England's Position | Position Status |
|---------|--|--|-----------------|
| 6. | Project Change Request 2: Onshore Substation Zone [AS-152] is appropriate and acceptable. | <p>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 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 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. | <p>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></p> <p>Historic England clarified at the meeting held to discuss responses to ExA WQ2 on 20/05/2025 that their comments related to their view of the Applicants engagement with policy on public benefit (discussed at SoCG ID. 19 and 40 below) rather than any lack of engagement with Historic England during the application process.</p> | |
| EIA – Baseline Environment | | | |
| 8. | The ES adequately characterises the baseline environment as detailed in section 17.5 of Chapter 17 Offshore Archaeology and Cultural Heritage [APP-133]. | 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 |
|-------------------------------------|--|---|-----------------|
| | 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 | | |
| 9. | 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]. | 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. | 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. | 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. | |
| 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. | |

| SoCG ID | The Applicants' Position | Historic England's Position | Position Status |
|---------|---|--|-----------------|
| 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. | |
| 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> | 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. | |

| SoCG ID | The Applicants' Position | Historic England's Position | Position Status |
|-------------------------------------|--|---|-----------------|
| | 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. | | |
| 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 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)</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 |
|---|---|--|-----------------|
| 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 commented on 25/06/2025 that:</p> <p><i>'20/06/2025 HE update:</i></p> <p><i>This was agreed in Responses to Examining Authority's Second Written Questions (ExQ2) [REP5-046]'</i></p> | |
| 18. | <p>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.</p> | <p>Historic England commented on 25/06/2025 that:</p> <p><i>'20/06/2025 HE update:</i></p> <p><i>This was agreed in Responses to Examining Authority's Second Written Questions (ExQ2) [REP5-046]'</i></p> | |

3.4 Onshore Archaeology and Cultural Heritage

Table 3-4 - Topics agreed 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. | <p>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.</p> <p>This matter is agreed as set out in Historic England's comment on 02/07/2025.</p> | <p>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></p> <p>On 02/07/2025 Historic England commented the following: 'HE update at deadline 8: <i>As a result of discussion between HE and the Applicants, this issue is no longer in dispute between the parties.'</i></p> | |
| EIA – Baseline Environment | | | |
| 20. | <p>The ES adequately characterises the baseline environment in of the Onshore Archaeology and Cultural Heritage risks as detailed in section 22.5 of Chapter 22 Onshore Archaeology and Cultural Heritage [AS-092].</p> | <p>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, including areas that are outside the previous PEIR Development Boundary limits.</p> | |

| SoCG ID | The Applicants' Position | Historic England's Position | Position Status |
|-------------------------------------|--|--|-----------------|
| 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. | |
| 25. | The impact assessment methodologies used for the EIA, as presented in section 22.4.3 of Chapter 22 Onshore Archaeology | Historic England confirmed in the Historic Environment – Pre-Scoping (14/09/2021) that they agree with the approach to the | |

| SoCG ID | The Applicants' Position | Historic England's Position | Position Status |
|---------|--|--|-----------------|
| | <p>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.</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 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> | <p>EIA methodology, and in the Onshore Heritage – Onshore Archaeology and Heritage Update ETG (2023).</p> <p>However, Historic England raised concerns with the methodology within their RR [RR-022].</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> <p>On 02/07/2025 Historic England commented the following:</p> <p>'HE update at deadline 8: as set out at WQ1.6 (question 2.3) [REP3-043], HE accepts that amending the valuation of Grade II listed buildings would not affect the findings of the ES. As such, this matter is no longer in dispute between the parties.'</p> | |
| 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): "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 | |

| SoCG ID | The Applicants' Position | Historic England's Position | Position Status |
|-------------------------------------|---|---|-----------------|
| | | <i>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 ' <i>assessment of the archaeological resource</i> ' set out in the ES provides a ' <i>clear basis for directing effective and functioning work packages</i> ' in the ' <i>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 | | | |

| SoCG ID | The Applicants' Position | Historic England's Position | Position Status |
|---------|--|--|-----------------|
| 32. | <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 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 the in the Design and Access Statement (Revision 2) [REP2-027].</p> | <p>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 3-5.</p> <p>On 02/07/2025 Historic England commented the following:</p> <p>HE update at deadline 8: It remains our view that the impact of the proposed OCS on the significance of the Butt Farm Gunsite represents less than substantial harm. Initially, when the two OCS plant option was proposed, it was our view that this represented 'less than substantial harm' but at the high end of that spectrum. The proposal has now evolved, and only a single OCS plant option is being proposed. It is our view therefore that although this still represents 'less than substantial harm' it is less so than the initial configuration.</p> <p>We welcome the agreement that there should be no permanent lighting/signage on the access track.</p> <p>We welcome the commitment to consult HE on the Design Review Panel's report.</p> <p>We welcome the updated DAS [REP7-103].</p> | |

| SoCG ID | The Applicants' Position | Historic England's Position | Position Status |
|---|--|---|-----------------|
| | | <i>The DCO, if made, would require details of lighting, landscaping and design to be approved by the LPA on the basis that the details submitted for approval must accord with the DAS (requirements 9, 10 and 22; REP7-012]). We therefore consider that this matter is agreed.'</i> | |
| EIA – Cumulative Impacts | | | |
| 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 3-5 . | |
| 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> | | |

| SoCG ID | The Applicants' Position | Historic England's Position | Position Status |
|---------|--|--|-----------------|
| 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. | |
| 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 approaching 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</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. | |

| SoCG ID | The Applicants' Position | Historic England's Position | Position Status |
|----------------------------------|--|--|-----------------|
| | 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. | 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'. Historic England also noted that 'additional surveys and evaluation' are required. | |
| 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 3-5 . On 02/07/2025 Historic England commented the following: 'HE Comment for ExA: refer to Table 3-5, Item 39 [now item 40]' | |
| 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. | |

| SoCG ID | The Applicants' Position | Historic England's Position | Position Status |
|---------|--|---|-----------------|
| 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. | |
| 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 | Historic England note in their RR [RR-022] that more 'naturalistic' planting or 'estate landscape' planting might be | |

| SoCG ID | The Applicants' Position | Historic England's Position | Position Status |
|---------|---|---|-----------------|
| | 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. | 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 3-5 . | |
| 49. | The Archaeology and Cultural Heritage specific viewpoints included in the Onshore Infrastructure Settings Assessment [APP-178] have been agreed with Historic England and are acceptable and appropriate. | Historic England noted that their comment on the SoCG (dated 28/01/2025): " <i>Please check</i> " referred to a need to ensure that 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'

3.5.1 Onshore Archaeology and Cultural Heritage

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

| SoCG ID | Discussion Point | Applicants' Position | Historic England's position | Position Status |
|---------|---|--|---|-----------------|
| 32. | <u>The conclusions of the assessment of significance regarding Heavy Anti-aircraft gunsite, 350m west of Butt Farm'</u> | <p><u>The Applicants have assessed this impact as of low magnitude, resulting in a moderate adverse effect which would be significant in the absence of mitigation (Appendix 22-5 - Onshore Infrastructure Settings Assessment (Revision 2) [REP7-076] section 85, Chapter 22 Onshore Archaeology and Cultural Heritage (Revision 3) [REP7-073], section 344). This would equate to less than substantial harm, which is agreed between the Applicants and Historic England.</u></p> <p><u>It is agreed between the Applicants and Historic England that Change Request 2: Onshore Substation Zone [AS-152] would reduce the magnitude of any effect on the Anti-Aircraft Battery.</u></p> <p><u>The remaining not agreed element of this matter is magnitude of impact on the Anti-Aircraft Battery. The Applicant considers that the impact in the absence of mitigation would constitute less than substantial harm</u></p> | <p><u>On 02/07/2025 Historic England commented the following:</u></p> <p><u>'HE update at deadline 8: It remains our view that the impact of the proposed OCS on the significance of the Butt Farm Gunsite represents less than substantial harm. Initially, when the two OCS plant option was proposed, it was our view that this represented 'less than substantial harm' but at the high end of that spectrum. The proposal has now evolved, and only a single OCS plant option is being proposed. It is our view therefore that although this still represents 'less than substantial harm' it is less so than the initial configuration.</u></p> <p><u>We welcome the agreement that there should be no permanent lighting/signage on the access track.</u></p> | |

| SoCG ID | Discussion Point | Applicants' Position | Historic England's position | Position Status |
|---------|------------------|---|--|-----------------|
| | | <p><u>at the lower end of the scale that would be effectively mitigated to no harm by the combination of agreed surface treatment of the Onshore Converter Station Buildings and the landscape mitigation secured under DCO Requirement 10. Because this landscape mitigation would take time to mature, the Applicants consider that any harm would persist, albeit at a decreasing magnitude reflecting the growth of the planting, until Year 10 of operation. The not agreed element of this matter remains the magnitude of harm in the absence of mitigation, which Historic England consider to be at the higher end of the scale, and the residual effect after the implementation of mitigation, which Historic England consider to be unchanged by the agreed mitigation-</u></p> <p><u>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].</u></p> <p><u>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, APP-233] and would be agreed through a design review process post consent [section 5, APP-233].</u></p> | <p><u><i>We welcome the commitment to consult HE on the Design Review Panel's report.</i></u></p> <p><u><i>We welcome the updated DAS [REP7-103].</i></u></p> <p><u><i>The DCO, if made, would require details of lighting, landscaping and design to be approved by the LPA on the basis that the details submitted for approval must accord with the DAS (requirements 9, 10 and 22; REP7-012)). We therefore consider that this matter is agreed.'</i></u></p> <p><u><i>Although Historic England agree with the magnitude of impact on the Anti Aircraft Battery, the not agreed element of this matter remains the residual effect after the implementation of mitigation-</i></u></p> <p><u><i>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</i></u></p> | |

| SoCG ID | Discussion Point | Applicants' Position | Historic England's position | Position Status |
|---------|---|---|--|-----------------|
| | | <p><u>The Applicants have engaged with Historic England to attempt 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. Further engagement was undertaken on 10/06/2025 to consider the most appropriate landscape treatment of the access track. However, the Applicants and Historic England have not been able to reach common ground on this matter.</u></p> <p><u>The Applicants consider that the proposed works at the Butt Farm gun site that are set out at Appendix 3 of the Outline Onshore Written Scheme of Investigation [REP4-048] do not constitute mitigation, but represent enhancement of the asset in line with Historic England's request to offer public benefit. These matters are discussed more fully at SoCG ID 40 below.</u></p> | <p><u>removing the intervention, reducing its impact, or finding ways to mitigate that harm'.</u></p> <p><u>On 02/07/2025 Historic England commented the following:</u></p> <p><u>'HE update at deadline 8: Comments at 39 [now 40] apply here. We agree with the applicant that enhancement proposals for the Butt Farm Gunsite have been circulated, all that is required is to agree the detailed scope of proposals to be finalised and implemented through the agreement of the scheme-wide Public Outreach / Community Engagement Strategy set out at Appendix 3 of the OWSI mechanism for the proposals to be finalised and implemented.'</u></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</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 "the greater understanding of the</p> | |

| SoCG ID | Discussion Point | Applicants' Position | Historic England's position | Position Status |
|---------|------------------|---|---|-----------------|
| | | <p>landscaping 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 have engaged with Historic England to attempt 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>site as one in a series of power generation sites would allow 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" and "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> <p>Historic England confirmed this remained their position via email on 25th June 2025.</p> | |

| SoCG ID | Discussion Point | Applicants' Position | Historic England's position | Position Status |
|------------------|--|---|--|-----------------|
| 40.39 | Section 9 of the Outline Onshore WSI, Public Outreach / Community Engagement | <p>The outreach sections of the Outline Onshore WSI [APP-239] were presented as an initial draft, reflecting the early stage of the proposals.</p> <p>The Applicants have engaged 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>Proposals for outreach were set out in the updated Outline Written Scheme of Investigation submitted to the examination at Deadline 4 and represent a strategy for development into concrete actions post-consent. <u>At Historic England's request, these proposals were moved from Section 9 to Appendix 3.</u></p> <p>The Applicants have met with Historic England and other parties at Butt Farm (on 04/06/2025) and engaged with the landowners to discuss the scope and feasibility of physical enhancements to the Butt Farm site.</p> <p>The Applicants have attended a meeting to agree scope and terms of reference of a cross-project forum on</p> | <p>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>'. Historic England noted in their RR [RR-022] that they '<i>remain willing to assist the applicant in the formulation of an appropriate outreach and engagement scheme befitting the scale of the project</i>'.</p> <p>Historic England Comment (28/01/2025): "<i>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.</i>"</p> <p>On 02/07/2025 Historic England commented the following:</p> <p>'HE update at deadline 8: <i>Historic England and the applicant have made considerable advances on this matter. The Outline WSI has been amended to include an Outreach strategy and the cross-project consultation group has been constituted and met on one occasion.</i></p> | |

| SoCG ID | Discussion Point | Applicants' Position | Historic England's position | Position Status |
|-------------------|--|---|--|-----------------|
| | | <p>public engagement hosted by Historic England, however Historic England and the Applicants have not been able to reach common ground on this matter.</p> <p><u>The Applicants have also put forward enhancement proposals (to be delivered through Section 9 of the Outline Onshore WSI) for the Butt Farm site, including 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. Detailed proposals for enhancement works at the Butt Farm Gun site would be finalised post-consent in consultation with Historic England and East Riding of Yorkshire Council and delivered as part of the scheme-wide Public Outreach / Community Engagement Strategy set out at Appendix 3 of the OWSI. The Applicants position is that these proposals are potential enhancement measures rather than mitigation required to offset the effects of the Projects.</u></p> | <p><i>A site meeting was held at the Butt Farm Gunsite to look at the condition of the monument and have early thoughts about conservation options. All that remains is to establish the <u>detailed scope of proposals to be finalised and implemented through the agreement of the scheme-wide Public Outreach / Community Engagement Strategy set out at Appendix 3 of the OWSI.</u> mechanism by which <u>enhancements are to be finalised and delivered.</u></i></p> | |
| 4 8 7. | Mitigation of effects on the Heavy Anti- | 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 | 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 | |

| SoCG ID | Discussion Point | Applicants' Position | Historic England's position | Position Status |
|---------|--|--|--|-----------------|
| | aircraft gunsite, 350m west of Butt Farm | <p>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, APP-233] and would be agreed through a design review process post consent [section 5, APP-233].</p> <p>The Applicants have also put forward enhancement proposals (to be delivered through Section 9 of the Outline Onshore WSI) for the Butt Farm site, including 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. The Applicants position is that these proposals are potential enhancement measures rather than mitigation required to offset the effects of the Projects.</p> <p>The Applicants have engaged with Historic England to attempt 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. Further engagement was</p> | <p>Landscape and Visual Impact [APP-192] onwards and Figures 23-15a2 [APP-193]; Figures 23-15a3 [APP-193] is not an '<i>effective or lasting mitigation measure in this instance</i>'. Historic England's position is that the harm '<i>this can be achieved by removing the intervention, reducing its impact, or finding ways to mitigate that harm</i>'.</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> <p>On 02/07/2025 Historic England commented the following:</p> <p>'HE update at deadline 8: Comments at 39 apply here. We agree with the applicant that enhancement proposals for the Butt Farm Gunsite have been circulated, all that is required is to agree the <u>detailed scope of proposals to be finalised and implemented through the agreement of the scheme-wide Public Outreach / Community Engagement Strategy set out at Appendix 3 of the OWSI</u></p> | |

| SoCG ID | Discussion Point | Applicants' Position | Historic England's position | Position Status |
|---------|------------------|---|---|-----------------|
| | | undertaken on 10/06/2025 to consider the most appropriate landscape treatment of the access track. However, the Applicants and Historic England have not been able to reach common ground on this matter. | mechanism for the proposals to be finalised and implemented. | |

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 has been updated throughout the Examination and represents the agreed position and final SoCG between the Applicants and Historic England at Deadline 89.

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].

RWE Renewables UK Dogger Bank
South (West) Limited

RWE Renewables UK Dogger Bank
South (East) Limited

Windmill Business Park
Whitehill Way
Swindon
Wiltshire, SN5 6PB

