

From: [REDACTED]
To: [REDACTED] Outer Dowsing Offshore Wind
Cc: [REDACTED] Midlands ePlanning
Subject: Re: Outer Dowsing Offshore Wind - Historic England Submission Deadline 4 ExAQ2
Date: 03 February 2025 17:28:31
Attachments: [REDACTED]

Dear Pins

Our response to ExAQ2 (Deadline 4: Monday 3 February 2025) as follows:-

HISTORIC ENGLAND ADVICE

HE Historic Environment

Q2 HE 1.2 The applicant Lincolnshire County Council (LCC) Historic England (HE) Requirement 17 and Onshore Outline Written Scheme of Investigation (OWSI) for Archaeological Works

Further to satisfying Issue Specific Hearing 3 (ISH3) Action Point 4 [EV7-010], where disagreement remains, all parties to set out their preferred wording of Requirement 17 with reasons. Furthermore, all parties to provide a detailed update on the OWSI, including any outstanding disagreements on the contents and the likelihood of these being resolved within the timescales of the examination.

Q2 HE 1.2 Historic England are content with the latest submitted wording of Requirement 17 and the applicant's proposed update to the OWSI as follows, on which basis there is no outstanding disagreement between HE and the Applicant.

Requirements 17 (DCO as submitted Sept 2024 ref: PD1-024, PD1-025, PD1-026)

Onshore archaeology 17. -

- (1) No stage of the onshore transmission works may commence until a written scheme of archaeological investigation (which must accord with the outline onshore written scheme of investigation for archaeological works and is informed by the archaeological investigations referred to in sub-paragraph (2)) for that stage has been submitted to and approved by Lincolnshire County Council in consultation with the relevant planning authority and Historic England.
- (2) Archaeological investigations carried out as part of onshore preparation works must only take place in accordance with a specific written scheme of investigation (which must accord with the outline onshore written scheme of investigation for archaeological works) which has been submitted to and approved by Lincolnshire County Council in consultation with the relevant planning authority and Historic England.
- (3) All archaeological investigations (other than archaeological investigations carried out as part of onshore preparation works referred to in sub-paragraph (2)) must be carried out in accordance with the written scheme of archaeological investigation approved under sub-paragraph (1).
- (4) In the event that archaeological site investigation is required, the archaeological site investigations and post investigation assessment must be completed in accordance with the programme set out in the written scheme of archaeological investigation and provision made for analysis, publication and dissemination of results and archive deposition.

Updated text for OWSI shared by applicant with HE and LCC 16/01/25

9.2 Trial Trenching

72. Trial trenching will be undertaken in line with a subordinate WSI which will be in accordance with this OWSI, to be agreed in advance with the Historic Environment Officer at LCC in consultation with Historic England and the relevant LPA.

73. Test pits, slit trenches/sondages or auguring will be utilised within archaeological trial trenches or instead of archaeological trial trenches to achieve evaluation to necessary depths where the instability of soils effects the practicality of standard archaeological trial trenching. This is most likely in the southern part of the Order Limits.

74. Preconstruction trial trenching will be informed by the results of the 2024 campaign and will include the targeting of 'blank' areas in reference to all baseline data in order that trial trenching is proportionate and undertaken in areas of potential only. Pre-construction trial trenching will be undertaken in accordance with a subordinate WSI to be approved by the Historic Environment Officer at LCC in consultation with Historic England and the relevant LPA under Requirement 17(2) of the DCO.

Q2 HE 1.3 Lincolnshire County Council (LCC) Historic England (HE) Grouping of non-designated farmhouses

In its relevant representation [RR-004] and Local Impact Report [REP1-053] LCC requests that the impact on non-designated farmsteads is set out in greater detail for each asset rather than in groups. The applicant's response to the relevant representation [PD1-071] states: "Historic England's Good Practice Advice Planning Note 3 (The Setting of Heritage Assets) references that assessment of impact through setting change needs to be proportionate to the significance of the heritage asset and proportionate to the degree of change. The grouping of non-designated farmhouses within the vicinity of the cable route, reflects the grouping of assets of low importance where potential impacts will be temporary. This level of assessment is in accordance with best practice and avoids unnecessary repetition. It is not anticipated that differential proximity to the cable route would alter conclusions around the potential harm through setting change. In no instance would it be anticipated that farmhouses within the vicinity of the cable route would experience an impact of greater than minor adverse effect. There is no potential for significant effects. The assessment of farmhouses within the vicinity of the cable route is considered sufficient on these grounds."

· In light of this response, do HE and LCC consider that the grouping of non-designated farmsteads for assessment provides sufficient information for the Secretary of State to have confidence on the effects on the significance of individual heritage assets when these have not been assessed individually? If not, why not? If not, please set out what you would require to satisfy yourselves within the timescales of the examination.

Q2 HE 1.3 Historic England consider that (in this specific instance with regards to potential harm through setting change for farmhouses within the vicinity of the cable route) the grouping of non-designated farmsteads for assessment provides sufficient information for the Secretary of State to have confidence on the effects on the significance of individual heritage assets without these having been assessed individually.

Yours faithfully

[REDACTED] (for Historic England)

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From: [REDACTED]
Sent: 27 November 2024 21:42
To: OuterDowsingOffshoreWind@planninginspectorate.gov.uk <OuterDowsingOffshoreWind@planninginspectorate.gov.uk>
Subject: Outer Dowsing Offshore Wind - Historic England Submission Deadline 2 ExAQ1

Dear Pins

Our response to ExAQ1 as follows:-

HISTORIC ENGLAND ADVICE

Q1 HE 1.4 LCC HE Further Archaeological Surveys/Works

Further to the comments from LCC [RR-004] relating to the lack of evaluation at all levels (including aerial photographs, geophysical survey and trial trenching), can LCC and HE comment on:

- **the Applicant's response to Relevant Representations – including details of geoarchaeological works [PD1-071, Section RR-027.006];**
- **the Onshore Archaeological Geophysical Report [PD1-080]; and**
- **updated Requirement 17 of the draft Development Consent Order (ddCO) [AS1-024]**

There remain areas of the scheme where as yet geophysical survey and trial trenching etc have not effectively characterised archaeological significance. This lack of understanding of what lies beneath the ground in parts of the scheme presents thus far unmanaged risk; both in terms of timely project delivery and appropriate management of archaeological impacts (through informed design and mitigation). Whilst there can never be a complete understanding of what may be encountered the earlier and more fully techniques are deployed the more effectively risk can be controlled.

There are areas where geophysical survey is less effective due to soils and ground condition, these areas may require more detailed geoarchaeological modelling to target trench evaluation for instance to islands and shores and margins of ancient dryland. In general, archaeological investigatory techniques should be deployed in a complementary and iterative manner where one addresses the outputs or limitations of another.

The latest updated text for Requirement 17 Archaeology is document library references PD1-024, PD1-025, PD1-026, which we understand supersedes AS1-024 this DCO text addresses the need for the results of necessary further archaeological evaluation work (reporting post-DCO) to sit alongside the submitted *outline onshore written scheme of investigation for archaeological works* to inform the specification of archaeological mitigation works.

Given that as discussed above further archaeological evaluation work remains to be done the amended version (submitted Sept 2024) of Requirement 17 as set out in PD1-024, PD1-025, PD1-026 is necessary in place of that in document ref AS1-024 (submitted July 2024). It is this Sept 2024 revision of Requirement 17 that the applicant refers to in [PD1-071, Section RR-027.006] where they commit to further pre-construction archaeological works that will inform the WSI (s) (for mitigation).

In the Draft statement of common ground [REP1-027] between HE and the Applicant at para 2.1 item HE1 please read references 'PD1-024, PD1-025, PD1-026' in place of 'PD-023, PD-024, PD-025'.

We continue to refer you to the expertise of Lincolnshire County Council's archaeological specialists as regards to archaeological matters.

Q1 HE 1.5 LCC HE Updated Onshore Outline Written Scheme of Investigation (OWSI) for Archaeological Works

Are you satisfied that the updated OWSI [PD1-052] provides sufficient detail on:

- **preservation in situ and enforceable measures?**
- **determining the significance of archaeology which may be affected?**
- **contributing to knowledge and understanding, public benefit and public dissemination of information? Are you satisfied that it provides sufficient protection for unknown heritage/archaeological assets with appropriate mitigation in place to preserve such assets?**

In the draft statement of common ground between Historic England and the Applicant [REP1-027] we have marked item HE4 as agreed that "*The measures identified in the Outline Onshore Written Scheme of Investigation for Archaeological Works (PD1-052) are adequate to mitigate potential significant effects identified in Chapter 20: Onshore Archaeology and Cultural Heritage (AS1-048).*"

The OWSI [PD1-052] and Schedule of Mitigation as updated September 2024 ref PD1-058 and PD1-059 include an 'archaeological clerk of works' a position which provides some reassurance as to the robustness of measures for preservation in situ through there being a responsible qualified and experienced person on site. Enforceability of measures for preservation in situ rest upon the final detailing and supervision and control of archaeological works, and on clarity that if preservation proves impossible then full excavation and recording must be deployed. Given that the detail of measures for the assets to be preserved thereby are not yet available and their successful delivery cannot be guaranteed in the case of assets as yet unlocated, the assurance of preservation is we believe reliant upon the control of discharge of requirement 17 for Written Schemes of Investigation.

The applicant could address the enforceability of preservation in situ and the robustness of selection through a revision to the OWSI and Schedule of Mitigation to make clear that submitted WSI's for archaeological mitigation shall include:-

1. detailing of the methodology applied to the selection of assets for preservation,
2. a narrative of dialogue between the Archaeological Clerk of Works, the LCC archaeological advisor and Historic England, and
3. the specific and detailed measures to be deployed in respect of each asset identified for preservation.

Q1 HE 1.6 LCC HE Middlecott Almshouses

In light of [RR-084] Anthony Kindred and [RR-085] Lisa Kindred and the Applicant's response to Relevant Representations [PD1-071], clarify, with reasons, whether you consider the Applicant's conclusions in relation to the impact of vibration, noise and dust upon Middlecott Almshouses to be satisfactory.

The conservative limits to vibration levels set out by the applicant at PD1-071 in relation to Middlecott Almshouse are noted, as with noise and dust this would to be demonstrably effective require a mechanism for monitoring and control further to the submitted [APP-269] Outline Noise and Vibration Management Plan. LCC as the Highway Authority will be better placed to comment on that document and the likely deliverability of the limit for vibration set out at PD1-071, and whether a vibration monitoring procedure for access routes passing relevant vibration sensitive receptors (VSRs) should also be included within the final NVMP.

Yours faithfully

██████████ (for Historic England)

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