

DOGGER BANK D WIND FARM

Preliminary Environmental Information Report

Volume 2

Appendix 17.1 Consultation Responses for Offshore
Archaeology and Cultural Heritage

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APPENDIX 17.1 CONSULTATION REPONSES FOR OFFSHORE ARCHAEOLOGY
AND CULTURAL HERITAGE

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Prepared By:	Royal HaskoningDHV
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Glossary

Term	Definition
Design	All of the decisions that shape a development throughout its design and pre-construction, construction / commissioning, operation and, where relevant, decommissioning phases.
Development Consent Order (DCO)	A consent required under Section 37 of the Planning Act 2008 to authorise the development of a Nationally Significant Infrastructure Project, which is granted by the relevant Secretary of State following an application to the Planning Inspectorate.
Effect	An effect is the consequence of an impact when considered in combination with the receptor's sensitivity / value / importance, defined in terms of significance.
Environmental Impact Assessment (EIA)	A 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 and includes the publication of an Environmental Statement.
Environmental Statement (ES)	A document reporting the findings of the EIA which describes the measures proposed to mitigate any likely significant effects.
Evidence Plan Process (EPP)	A voluntary consultation process with technical stakeholders which includes a Steering Group and Expert Topic Group (ETG) meetings to encourage upfront agreement on the nature, volume and range of supporting evidence required to inform the EIA and HRA process.
Expert Topic Group (ETG)	A forum for targeted technical engagement with relevant stakeholders through the EPP.
Impact	A change resulting from an activity associated with the Project, defined in terms of magnitude.
Mitigation	Any action or process designed to avoid, prevent, reduce or, if possible, offset potentially significant adverse effects of a development. All mitigation measures adopted by the Project are provided in the Commitments Register.
Scoping Opinion	A written opinion issued by the Planning Inspectorate on behalf of the Secretary of State regarding the scope and level of detail of the information to be provided in the Applicant's Environmental Statement. The Scoping Opinion for the Project was adopted by the Secretary of State on 02 August 2024.
Scoping Report	A request by the Applicant made to the Planning Inspectorate for a Scoping Opinion on behalf of the Secretary of State.

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Term	Definition
	The Scoping Report for the Project was submitted to the Secretary of State on 24 June 2024.
The Applicant	SSE Renewables and Equinor acting through 'Doggerbank Offshore Wind Farm Project 4 Projco Limited'.
The Project	Dogger Bank D (DBD) Offshore Wind Farm Project, also referred to as DBD in this PEIR.

17.1 Consultation Responses on Offshore Archaeology and Cultural Heritage

- 1. **Volume 1, Chapter 17 Offshore Archaeology and Cultural Heritage** for the Dogger Bank D Offshore Wind Farm (herein referred to as ‘the Project’ or ‘DBD’) has been informed by consultation with the Planning Inspectorate and stakeholders following the publication of the Scoping Report (Royal HaskoningDHV, 2024) and the comments contained within the Scoping Opinion (Planning Inspectorate, 2024). This appendix contains details of the relevant comments for **Volume 1, Chapter 17 Offshore Archaeology and Cultural Heritage** and the Applicant’s responses in **Table 17.1-1**.
- 2. The Applicant previously submitted a Scoping Report in 2023 based on project parameters at that time. The 2024 Scoping Report (Royal HaskoningDHV, 2024) and adopted Scoping Opinion (Planning Inspectorate, 2024) have superseded the 2023 Scoping Report and as such consultation responses on the 2023 Scoping Report are not considered further in this document except where they are included in the 2024 consultee responses and remain relevant to the Project.

Table 17.1-1 Consultation Responses for Offshore Archaeology and Cultural Heritage

Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
MMO	Scoping Opinion (02/08/24)	The MMO defers to Historic England on the suitability of the scope of the assessment with regards to Archaeology and Cultural Heritage impacts.	N/A
Historic England	Scoping Opinion (02/08/24)	In view of the comments we provided on the previous Scoping Report, we welcome the inclusion of scoped in impacts related to the proposed Dogger Bank D array area.	Table 17-3 of Volume 1, Chapter 17 Offshore Archaeology and Cultural Heritage details the impacts scoped into the Project.

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Historic England	Scoping Opinion (02/08/24)	With regard to references to the updated National Policy Statements however, it is unclear why they have not been included in section 7.11 'Offshore Archaeology and Cultural Heritage'. This is something that needs to be adequately addressed in any preliminary environmental information report (PEIR).	Table 17-1 of Volume 1, Chapter 17 Offshore Archaeology and Cultural Heritage includes the relevant update of the NPS.
Historic England	Scoping Opinion (02/08/24)	It is understood that since the previous iteration of the Scoping Report, marine geophysical survey data has been completed and archaeologically assessed for the proposed array area, with a further survey of the new offshore export cable to take place in 2024/2025. In addition, a geotechnical survey is similarly planned for 2024/2025 for both the array area and offshore export cable. In consideration of this approach, we feel that this has the potential to inform the planned PEIR and Environmental Statement (ES), to outline a clearer indication of development related impacts. Whilst also informing future strategies of mitigation and potential offsetting, through an improved picture of the nature, extent, and potential significance of recorded sites, and potentially revealing previously unrecorded heritage assets also.	Geotechnical and geophysical data collected from the offshore export cable corridor is not available for PEIR stage but should be available to inform the ES. This is outlined in Section 17.6.1.2 of Volume 1, Chapter 17 Offshore Archaeology and Cultural Heritage .

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Historic England	Scoping Opinion (02/08/24)	In the future PEIR and ES care should be taken to reference and fully utilise the most up to date North Sea Prehistory Research and Management Framework. This, along with the assessment of archaeological boreholes and vibrocores and sub-bottom profiling data, should as far as possible identify the potential depth and character of deposits of archaeological interest through a preliminary deposit model as part of the desk-based assessment. This should be prepared by a geoarchaeologist. The deposit model will also help to inform any subsequent evaluation strategy, e.g. borehole sampling, geophysical survey, or ROV investigations. In this regard the PEIR should also look to utilise the guidance document: Gribble J. and Leather S. (2011) Guidance for Offshore Geotechnical Investigations and Historic Environment Analysis: guidance for the renewable energy sector. Published by the former COWRIE Group.	All geotechnical data will be assessed by a suitably qualified geoarchaeologist and will take account of all relevant documentation and research frameworks, as set out in Section 17.5.2 of Volume 1, Chapter 17 Offshore Archaeology and Cultural Heritage . Additionally, guidance documents that will be taken into account are provided in Section 17.6 of Volume 1, Chapter 17 Offshore Archaeology and Cultural Heritage .
Historic England	Scoping Opinion (02/08/24)	We consider that when formulated, the PEIR should, when incorporating seabed mapping and seabed/sub-seabed investigations and synthesising such data to present an archaeological assessment (as described in section 7.11.8) to support the application - has the potential to provide a clear characterisation. At present the content of the Scoping Report can only provide a general and very summarised description of the area in which this development is proposed.	A detailed baseline is presented at Section 17.6 of Volume 1, Chapter 17 Offshore Archaeology and Cultural Heritage .

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Historic England	Scoping Opinion (02/08/24)	We are of the opinion that the summarised impacts in the Scoping Report provide an illustration of potential impacts to offshore archaeology and cultural heritage resulting from the proposed project. We do however expect more refined detail of such impacts to be fully identified and explained at future stages of pre-application and ES with respect to relevant NPS's.	Table 17-3 of Volume 1, Chapter 17 Offshore Archaeology and Cultural Heritage details the impacts scoped into the assessment.
Historic England	Scoping Opinion (02/08/24)	As detailed above, we are pleased to see that impacts relating to the proposed array area have now been included. Therefore, we feel impacts to offshore archaeology and cultural heritage have in general been adequately scoped in to support the future assessment process.	Noted
Historic England	Scoping Opinion (02/08/24)	The Scoping Report provides a summary of data sources. We do however expect a much more detail list of relevant data sources will be included in the PEIR.	A detailed list of relevant data sources and guidance documents is provided in Section 17.6 of Volume 1, Chapter 17 Offshore Archaeology and Cultural Heritage.
Historic England	Scoping Opinion (02/08/24)	The assessment approach needs to ensure clear reference and consideration of the most up to date National Policy Statements for energy infrastructure.	Table 17-1 of Volume 1, Chapter 17 Offshore Archaeology and Cultural Heritage includes the relevant update of the NPS.

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Planning Inspectorate	Scoping Opinion (02/08/24)	<p>The Scoping Report states that the assessments undertaken in the Teesside A & B ES concluded any changes in setting due to construction activities would be temporary and of sufficiently short duration that they would not give rise to material harm. Similarly, the Scoping Report states that changes to the historic seascape character during construction of the Proposed Development (associated with the presence of installation vessels) would be short term and temporary and would not result into a material change to the character of the historic seascape.</p> <p>Decommissioning impacts are described as similar to those of construction (although likely lower in magnitude). The Inspectorate agrees that any impacts on the setting of heritage assets and historic seascape character from construction and decommissioning of the offshore infrastructure are not likely to result in significant effects. This matter can be scoped out of the ES.</p>	Noted
Planning Inspectorate	Scoping Opinion (02/08/24)	<p>The Scoping Report states that the study area corresponds to the footprint within which development activities could occur. The study area used for the purposes of the ES assessment should be sufficient to identify all LSE of the Proposed Development, including any potential effects caused by changes to marine physical processes. The ES should also confirm whether the study area aligns with relevant policy and guidance and provide justification for any divergences.</p>	Changes marine physical processes are assessed in Section 17.7 and Section 17.8 of Volume 1, Chapter 17 Offshore Archaeology and Cultural Heritage .

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Planning Inspectorate	Scoping Opinion (02/08/24)	The ES should explain whether there is potential for UXO clearance to impact on heritage assets. The Applicant's attention is drawn to the Inspectorate's comments regarding impacts from UXO in Table 2.1 above (Ref 2.1.15).	Following the acquisition and assessment of geophysical data from the offshore export cable corridor (ECC), all data sets relating to potential archaeological seabed features will be provided to UXO contractors.

References

Royal HaskoningDHV (2024). Dogger Bank D Scoping Report (Part 1 & 2). Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010144/EN010144-000069-EN010144%20-%20Scoping%20Report%20-%20Part%201.pdf> & <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010144/EN010144-000070-EN010144%20-%20Scoping%20Report%20-%20Part%202.pdf> [Accessed September 2024].

The Planning Inspectorate (2024). Scoping Opinion adopted by the Secretary of State on 02 August 2024. Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010144/EN010144-000071-EN010144%20-%20Scoping%20Opinion.pdf> [Accessed September 2024].

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List of Acronyms

Acronym	Definition
DBD	Dogger Bank D Offshore Wind Farm Project
DCO	Development Consent Order
ECC	Export Cable Corridor
ES	Environmental Statement
LSE	Likely Significant Effect
MMO	Marine Management Organisation
NPS	National Policy Statement
PEIR	Preliminary Environmental Information Report
UXO	Unexploded Ordnance