



Net Zero Teesside Project  
Planning Inspectorate  
On-line submission

Our ref: PL00704331  
Your ref: EN010103

Telephone 0191-403-1659

08 June 2022

Dear PINS Net Zero Teesside Project Team

**Re: ExA 1st written questions**

Please note that the Historic Buildings and Monument Commission England (also referred to as ‘Historic England’) are not registered as an ‘Interested Party’ to this DCO.

I have set out below the Historic Buildings and Monument Commission England (we can also be referred to as ‘Historic England’) response to the ExA 1st written questions for Deadline 2.

Question Reference	Question	Historic England (HBMCE) response
HE.1.2	<p>ES Chapter 19 [APP-101] relates to marine heritage. It notes at Table 19-7 that there are two known undesigned heritage assets (shipwrecks) within the site boundary and at paragraphs 19.4.26 to 19.4.32 refers to a range of potential historic environment receptors. Confirmation is sought from Historic England, the MMO, RCBC and HBC (archaeology):</p> <ul style="list-style-type: none"> <li>i) Whether or not the Applicants’ assessment is accurate, and whether there are likely to be any additional previously unrecorded heritage assets;</li> <li>ii) If the mitigation and enhancement measures set out in section 19.7 of the ES [APP-101] (including a pre-</li> </ul>	<p>(i) Historic England consider that the applicants have accurately assessed and identified the known marine non-designated heritage assets and the potential for unknown assets. The changeable nature of the marine environment is such that previously unknown wrecks can come to light, so the mechanism provided by the reporting and recording “Archaeological Protocol” (Deemed Marine Licence (DML) requirement 15 (see <b>[APP-005]: Schedule 11 Deemed Marine Licence (DML), Requirement 15</b>) to be agreed in consultation with the MMO should deliver the measures for recording unexpected assets.</p> <p>We consider that the measures for</p>





	<p>construction geoarchaeological assessment) would be appropriate; and</p> <p>Whether R14 of the dDCO could be applicable to marine heritage assets as well as terrestrial archaeology, and any suggested amendments to wording.</p>	<p>mitigation and enhancement of the marine heritage is appropriate.</p> <p><u>Comments on merging R14 &amp; R15:</u> The archaeological requirements are currently set out in the draft DCO [APP-005] in <b>DCO Schedule 2: Requirement 14</b> for land-based heritage and for marine heritage in <b>DML Schedule 11: Requirement 15</b>.</p> <p>Historic England consider that it is appropriate that these two requirements are kept separate as they deal with two different types of archaeological heritage.</p> <p>As DML R15 delivers mitigation measures for marine heritage the written scheme of archaeological investigation should detail the action necessary to complete the geo-archaeological assessment recommended in 19.7.1 of the ES.</p> <p>We would anticipate that the MMO would consult with us when they are consulted about approving the WSI as set out in DML R15.</p>
HE.1.3	<p>ES Chapter 18 Archaeology and Cultural Heritage [APP-100] section 18.6 refers to likely impacts and effects on a number of <b>non-designated heritage</b> assets within the Order Limits. ES Figure 18-2 [APP-230] indicates the location of non-designated heritage assets within the 1km study area. ES Appendix 18B [APP-339] at Table 18.5 includes a gazetteer of these non-designated heritage assets. Historic England, RCBC, STBC and HBC (archaeology) are asked to confirm:</p> <ul style="list-style-type: none"> <li>i) Is the 1km study area sufficient?</li> <li>ii) Do Figure 18-2 and ES Appendix 18B provide an accurate and up-to-date record of non-designated heritage assets within the site and 1km study area? Are there any others that should be added?</li> </ul>	<p>(i)– (iii) Historic England consider this to be primarily a matter for the LPA heritage and conservation advisors as they are best placed to advise on the non-designated assets in this instance.</p> <p><u>Comment on R14:</u> Land-based heritage is dealt with in <b>R14</b> and it is important that the provisions appropriately deal with archaeology. Historic England consider this to be primarily a matter for the LPA heritage and conservation advisors</p> <p>However, we do note that there should be a provision for submission of a WSI and a requirement to carry out the scheme in accordance with the approved WSI. Historic England suggest that the wording of 14(2) may need to be amended to reflect this as the current wording refers to a part of the ES which is not an approved document.</p>





	<p>iii) Is the Applicants' assessment of impacts to the non-designated heritage assets within the site boundary at section 18.6 of the ES acceptable?</p> <p>Would R14 of the dDCO be appropriate in safeguarding any known and unknown archaeological features, and if not please suggest amendments to the wording?</p>	<p>The LPA and ExA may wish to consider if the following may be appropriate to be included in <b>R14</b> to ensure the safeguarding any known and unknown archaeological features:</p> <ul style="list-style-type: none"> <li>(i) Any archaeological remains not previously identified which are revealed when carrying out the authorised development must be retained in situ and reported to the relevant planning authority, as soon as reasonably practicable from the date they are identified.</li> <li>(ii) No construction operations are to take place within 10 metres of the remains referred to in sub-paragraph (i) for a period of 14 days from the date of any notice served under sub-paragraph (i) unless otherwise agreed in writing by the relevant planning authority in consultation with any other body as required.</li> <li>(iii) If the relevant planning authority determines in writing that the archaeological remains referred to in sub-paragraph (i) require further investigation or mitigation, no construction operations are to take place within 10 metres of the remains until provision has been made for such mitigation or the further investigation and recording of the remains in accordance with details to be submitted in writing to, and approved in writing by, the relevant planning authority in consultation with any other body as required.</li> </ul> <p>As we consider this to be a matter for the LPA we do not need to re-consulted on this issue.</p>
HE.1.4	<p>ES Chapter 18 Archaeology and Cultural Heritage [APP-100] paragraph 18.3.11 notes that a 5km study area has been applied for <b>designated</b> heritage assets, and a 1km search area for non-designated assets. These are illustrated in ES Figures 18-1 [APP-229] and 18-2 [APP-230]. ES Appendix 18B [APP-339] includes a gazetteer of the heritage</p>	<ul style="list-style-type: none"> <li>(i) Historic England consider that the 5km Study Area used for designated heritage assets appears to be sufficient in light of the nature of the proposed development in relation to the extant industrial nature of the surrounding area, the topography, as well as the location and type of the designated assets.</li> <li>(ii) We consider that Figures 18-1, 19-2</li> </ul>





	<p>assets.</p> <p>Section 18.6 of APP-100 sets out that there are no designated heritage assets within the Order Limits and refers to likely impacts and effects on a number of non-designated heritage assets within the site.</p> <p>RPA's and Historic England are asked to respond to the following:</p> <ul style="list-style-type: none"> <li>i) Whether the 1km and 5km study areas are sufficient;</li> <li>ii) Whether Figures 18-1, 19-2 and Appendix 18B provide an accurate and up-to-date record of heritage assets within the site and study areas;</li> <li>iii) If not, are there any other heritage assets that should be added?;</li> <li>iv) Whether the Applicants' assessment of impacts to the assets within the site boundary at section 18.6 of the ES is sufficient. In particular, paragraphs 18.6.14 to 18.6.24 relating to setting of nearby designated heritage assets. Has their significance been adequately identified, and has the effect on their setting and significance been adequately assessed?; and</li> </ul> <p>Would R14 of the dDCO be appropriate in safeguarding any known and unknown archaeological features? If not, please suggest amendments to the wording.</p>	<p>and Appendix 18B provide an accurate and up-to-date record of designated heritage assets within the site and study areas</p> <ul style="list-style-type: none"> <li>(iii) N/A</li> <li>(iv) We consider that the assessment of impacts on the designated assets (listed Gr I or II* or Scheduled Monuments) is appropriate and sufficient. We agree that their settings are both adequately identified and impacts on their settings and significance appropriately assessed. We defer to the Local Authority Conservation advisors with regards to comments on Gr. II assets.</li> </ul> <p>See response to HE 1.3 above regarding the efficacy of R14 to safeguard known and unknown features.</p>
HE.1.5	<p>The Redcar blast furnace is identified on Figure 18-2 [APP-230]. The structure and associated steel works infrastructure is assessed in ES Chapter 18 paragraph 18.6.2 [APP-100].</p> <p>Paragraphs 18.8.3 and 18.8.4 of the Cultural Heritage Baseline Report [APP-338] state that '<i>Standing structures associated with Redcar blast furnace and ancillary buildings are present within the proposed Site boundary. The buildings are indicative of the region's industrial heritage and are of local and possibly regional interest</i>', and that the structures are well-preserved and</p>	<ul style="list-style-type: none"> <li>(vi) Historic England consider that it is appropriate for the Local Authority to respond to this question regarding its status as a non-designated heritage asset. As noted in our S42 letter [APP-068] we advised that the Blast Furnace was a key heritage issue as we had understood it to be within the DCO boundary at that time.</li> <li>(vii) The "Redcar Blast Furnace" was considered for listing under DCMS guidance (<i>Principles of Selection for Listing Buildings</i> (2010) as well as</li> </ul>





<p>provide a functional setting to the furnace structure as well as being a well-known landmark of value to the local community through their historical associations and contribution to local identity.</p> <p>The former steel works are noted in the Stage 2 consultation responses from Save our Steel Heritage Group dated 14.09.20 and Historic England dated 15.09.20 [APP-068]. Historic England identify the former steel works as a key heritage issue, and that it would be appropriate for consideration to be given to the retention of its key features as part of the Proposed Development and recording prior to demolition.</p> <p>RCBC's Climate Change group in their pre-application consultation response dated 18.09.20 refers to ensuring the heritage legacy of steel making, as well as the South Tees Area SPD, principle STDC8 – Preserving Heritage Assets.</p> <p>Can the Applicants:</p> <ul style="list-style-type: none"> <li>i) Identify the location of the blast furnace in relation to the Order Limits around the PCC Site;</li> <li>ii) Confirm if the blast furnace and any other associated former steel works infrastructure are considered to be non-designated heritage assets;</li> <li>iii) If considered to be non-designated heritage assets, provide an assessment of their significance or signpost where this can be found in the submitted documents;</li> <li>iv) Provide an update on the timescales for demolition and clearance of the Redcar blast furnace and associated infrastructure; and</li> <li>v) Confirm whether pre-demolition recording has taken place/ will take place as suggested by Historic England in their pre-application consultation response [APP-068].</li> </ul> <p>The Applicants may wish to answer this question together with GEN.1.11.</p> <p><b>Can Historic England and RCBC:</b></p> <ul style="list-style-type: none"> <li>vi) Provide comment on whether the blast furnace and/or any other associated former steel works</li> </ul>	<p>their <i>Scheduled Monuments Policy Statement</i> (2013)) in 2016. It was determined that the Blast Furnace did not meet the requirements for designation.</p> <p>The historic significance of Teesside's iron industry as a whole is of undoubted national importance.</p> <p>The Teesside iron and steel industry developed rapidly from the mid C19 and for a time dominated the world's iron market. Steel produced at Redcar can be readily found and identified around the world with girders forming bridges and parts of buildings imprinted with the name Dorman Long, including the Sydney Harbour Bridge.</p> <p>The British Steel phase of the site, to which the blast furnace at Redcar belongs, is more difficult to assess. The furnace is of historical interest as the last commercial-scale blast furnace on Teesside, and because at the time of construction it was the largest such facility in Europe. Furthermore, it was the last one constructed in England. In 1975 there were 49 blast furnaces in the UK, 29 in England. In addition to the Redcar blast furnace, four still survive today at Scunthorpe, and two in South Wales.</p> <p>Historic England are aware that a request for listing the Blast Furnace has been received from a member of the public and it is currently being looked at.</p> <p>(viii) Historic England has taken aerial photographs of the blast furnace and associated works and also carried out extensive ground photography. Recently commissioned Historic England photographs, some archival images and a historic building record may be viewed on-line:</p>
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	<p>infrastructure are considered to be non-designated heritage assets;</p> <p>vii) If considered to be non-designated heritage assets, provide an assessment of their significance;</p> <p>viii) Provide comment on whether pre-demolition recording has been agreed and carried out (or whether it should take place and on which particular elements of the former steel works); and</p> <p>Provide further detail of any conflict with national and local policy including the South Tees Area SPD.</p>	<p><a href="https://doi.org/10.5284/1090511">https://doi.org/10.5284/1090511</a></p> <p>It is our opinion that all the pre-demolition recording of the Blast Furnace we may reasonably expect has been carried out. In addition, an important part of the record of the blast furnace and other parts of the works is the archive of site drawings, manuals, photographs, films, etc. Historic England understand that the <i>Teesside Heritage Taskforce</i> is arranging for this to be sifted and passed to appropriate archives for the benefit of this and future generations.</p>
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Should further clarification be required please contact us.

Yours sincerely,

Lee McFarlane

**Lee McFarlane**  
Inspector of Ancient Monuments

