

WRITTEN REPRESENTATION FOR SPR EA1N and EA2 PROJECTS (DEADLINE 1)



CULTURAL HERITAGE

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Summary

The written representation on Cultural Heritage comprises the expert report prepared by Richard Hoggett Heritage dated October 2020.

East Anglia ONE North & East Anglia TWO: Cultural Heritage Assessment



prepared for
Substation Action Save East Suffolk (SASES)

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Executive Summary

This report presents a critical review of the archaeological and cultural heritage elements of the pair of Development Consent Order (DCO) applications submitted by Scottish Power Renewables (hereafter 'the applicant') for the East Anglia ONE North (EA1N) and East Anglia TWO (EA2) offshore windfarms and associated onshore infrastructure. It has been commissioned by Substation Action Save East Suffolk (SASES), an action group representing communities in East Suffolk and on the Suffolk Coast.

Section 2 of this report reviews the relevant policy framework under which the pair of DCO applications will be determined, with a particular emphasis on those aspects of legislation, planning policy and guidance which relate to archaeological and cultural heritage matters.

Section 3 presents a critical assessment of the baseline archaeological and cultural heritage data which has been collated as part of the application process. This assessment concludes that there are significant shortcomings with the presented baseline archaeological assessment of the onshore development area, specifically in the form of an incomplete geophysical survey and a lack of investigative trial trenching to complement the submitted desk-based assessment. There is a presumption on the part of the applicant that these fieldwork elements should be carried out post-consent, but the fact that such fieldwork has not been undertaken by the applicant to date represents a major shortcoming in the assessment of the known and potential archaeological resource of the onshore development area. As such, the applications as they currently stand invite the making of a poorly informed decision with regard to the potential impact of the proposed scheme on the buried archaeological resource. By failing to provide the required level of detail, the applicant is failing in their stated duty under paragraph 5.8.10 of NPS EN-1.

Section 4 critically assesses the process via which the potential heritage impacts of the proposed schemes have been identified and assessed. It is clearly acknowledged by the applicant that the construction, operation and

decommissioning of the onshore infrastructure will have an impact upon the settings of surrounding heritage assets, yet only the impacts of the operational phase of the schemes are assessed in detail in the submitted documents. The failure to include the construction and decommissioning phases in the submitted assessment is a significant omission. The exclusion of the of the construction phase from the heritage impact assessment is particularly concerning, for in many cases the boundaries of the construction area lie in very close proximity to heritage assets, where they will arguably have a much greater impact than some of the later, operational phases of the proposed scheme. Concluding that there will be 'no impact' and dismissing the heritage impacts likely to be caused by the construction phase, which are set out in the preceding paragraphs of their own report, demonstrates a clear failure on the part of the applicant to adequately quantify and assess the heritage impacts across the full duration of the scheme. As a consequence, on the basis of the documents submitted to date it is not possible for an informed decision to be made about the overall heritage impact of the scheme to be made. Again, this is a failure on the part of the applicant to meet their obligations under paragraph 5.8.10 of NPS EN-1.

Section 5 reviews and revises the submitted impact assessments made of each of the designated heritage assets which will be affected by the operational phase of the proposed schemes due to changes to their settings. Limiting their assessment of the heritage impact of the proposed schemes solely to their operational phases, the applicant identifies that the greatest heritage impact of both proposed schemes is that caused to a group of seven designated heritage assets – two listed at Grade II* and five listed at Grade II – which surround the site of the proposed substations, National Grid substation and supporting infrastructure at Friston. Although each of the heritage assets is assessed singly, it should be stressed that these heritage assets do not exist in isolation and are all parts of a significant area of historic landscape which lies to the north of the village of Friston.

Specifically, the affected heritage assets are:

- The Church of St Mary, Friston (National Heritage List Entry No. 1287864) Grade II*

- Friston Post Mill (National Heritage List Entry No. 1215741) Grade II*
- Little Moor Farm (National Heritage List Entry No. 1215743) Grade II
- High House Farm (National Heritage List Entry No. 1216049) Grade II
- Friston House (National Heritage List Entry No. 1216066) Grade II
- Woodside Farmhouse (National Heritage List Entry No. 1215744) Grade II
- Friston War Memorial (National Heritage List Entry No. 1435814) Grade II

In my professional opinion, the applicant's assessments significantly underestimate the heritage impact of the proposed EA1N and EA2 schemes and undervalue the contribution made by setting to each of these designated heritage assets, resulting in much lower assessments of the adverse heritage impact on each of these individual listed buildings than might otherwise be concluded. In particular, the submitted illustrative viewpoints selected and photomontage visualisations are highly selective and do not include key views, such as that from the tower of Friston church, which would enable a better visual impression of the likely impact of the scheme to be presented.

The submitted assessments also demonstrate that the mitigation measures put forward in the proposed Outline Landscape Mitigation Plan do nothing to reduce the heritage impacts of the schemes in any meaningful way. In six of the seven instances where harm is identified, the applicant acknowledges that the proposed mitigation planting will be of such negligible effect that even after 15 years it will not have had sufficient effect to reduce the assessment of harm caused to any of the heritage assets. In short, by the applicant's own admission, the proposed mitigation scheme is not fit for purpose and will not reduce the heritage harm.

Contrasting summaries of the applicant's assessment of the likely heritage impact of the operational phase of the substations at Friston, together with my own assessments, are set out in the table below. Discrepancies between the applicant's assessment and my own are highlighted in red. I consider the potential impact of the construction of the EA1N and/or the EA2 substations and associated infrastructure to be the same. In the case of Woodside Farm, the applicant

considers impact of the EA1N substation to be greater than that of the EA2 substation, but I do not agree with this assessment.

Heritage Asset	Heritage Importance	Applicant's Assessment		My Assessment	
		Magnitude of Impact	Significance of Effect	Magnitude of Impact	Significance of Effect
Church of St Mary	High (II*)	Low	Moderate	High	Major
Friston War Memorial	Medium (II)	Negligible	Minor	Medium	Moderate
Little Moor Farm	Medium (II)	Medium	Moderate	Medium	Moderate
High House Farm	Medium (II)	Low	Minor	Medium	Moderate
Friston House	Medium (II)	Negligible	Minor	Low	Minor
Woodside Farmhouse (EA1N)	Medium (II)	Medium	Moderate	Medium	Moderate
Woodside Farmhouse (EA2)	Medium (II)	Low	Minor	Medium	Moderate
Friston Post Mill	High (II*)	Negligible	Minor	Negligible	Minor

As is acknowledged by the applicant, in every case, both with and without mitigation measures in place, the adverse impacts identified constitute 'less than substantial harm' in planning terms. Although the applicant does not offer a view, I conclude that this harm lies towards the upper end of the 'less than substantial' scale. Under existing planning law and policy it is required that these adverse impacts be weighed against the wider benefits of the application and that the greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval. Any decision taken will also require that the desirability of preserving the settings of listed buildings should be given 'considerable importance and weight' when the decision-maker carries out the balancing exercise (*Barnwell Manor Wind Energy Ltd v East Northants DC*, *English Heritage, National Trust and SSCLG* [2014] EWCA Civ 137, Para. 24).

Contents

Executive Summary	i
1 Introduction.....	1
2 Relevant Legislation, Policy and Guidance.....	4
2.1 Legislation.....	5
2.1.1 Planning Act 2008.....	5
2.1.2 Planning (Listed Buildings and Conservation Areas) Act 1990	5
2.1.3 Infrastructure Planning (Decisions) Regulations 2010	6
2.2 Planning Policy	7
2.2.1 NPS EN-1: Overarching National Policy Statement for Energy	7
2.2.2 NPS EN-3: Renewable Energy Infrastructure	10
2.2.3 NPS EN-5: Electricity Networks Infrastructure	10
2.2.4 The National Planning Policy Framework	12
2.2.5 East Suffolk Council – Suffolk Coastal Local Plan	13
2.3 Planning Guidance	15
2.3.1 National Planning Practice Guidance	15
2.3.2 The Setting of Heritage Assets.....	17
3 Review of Baseline Archaeological Data.....	20
3.1 Marine Archaeology and Cultural Heritage	20
3.2 Terrestrial Archaeology and Cultural Heritage	20
4 Identification of Impacts.....	24
5 Impact on the Setting of Heritage Assets.....	30
5.1 Identifying Affected Settings	30
5.2 Assessing Heritage Impact.....	34
5.3 Church of St Mary, Friston: Grade II*	39
5.4 Friston War Memorial: Grade II.....	46
5.5 Woodside Farmhouse: Grade II	48

5.6	Friston House: Grade II.....	51
5.7	Little Moor Farm: Grade II	53
5.8	High House Farm: Grade II	56
5.9	Friston Post Mill: Grade II*	59
6	Conclusion	61
7	References	67

List of Figures

Figure 1. The locations of the designated heritage assets discussed in the text. Scale 1:10,000.....	33
Figure 2. The applicant's Significance of Effect Matrix (ES Table 24.9).	35
Figure 3. A panoramic view across the proposed development area looking north from the top of Friston church tower.....	43
Figure 4. The view looking north across the proposed development area from within the nave of Friston parish church.....	44
Figure 5. Friston war memorial looking north towards the proposed development area. Note that the front of the memorial faces south-west.....	48
Figure 6. A long view looking southwards from the garden of High House Farm across the proposed development area. Note that the church tower and nave are clearly visible from a distance of 1.2km.	57

1 Introduction

- 1.1 My name is Dr Richard Hoggett. I am a freelance heritage consultant based in East Anglia with over 20 years' experience in the academic, commercial and local authority heritage sectors. In this capacity, I provide heritage planning services to a wide range of clients. Prior to establishing my consultancy in 2016, I was a Senior Archaeological Officer for Suffolk County Council, responsible for providing expert archaeological advice to Local Planning Authorities, developers and landowners. I have previously worked for the Norfolk Historic Environment Service and the Cambridgeshire Historic Environment Team.
- 1.2 I became a Member of the Chartered Institute for Archaeologists in 2010, the highest level of professional membership obtainable, and I was elected a Fellow of the Society of Antiquaries of London in 2016. I hold a PhD from the University of East Anglia (awarded in 2007), and an MA in Landscape Archaeology (2001) and a BA (Honours) in Archaeology (2000) from the University of Bristol. My doctoral research focussed on the establishment of the Church in Anglo-Saxon East Anglia, and I am a recognised authority on churches in the East Anglian landscape. I published a book based on my research in 2010.
- 1.3 I am instructed in this matter by Substation Action Save East Suffolk (SASES), an action group representing communities in East Suffolk and on the Suffolk Coast. SASES have instructed me to review and critique the archaeological and cultural heritage elements of the pair of Development Consent Order (DCO) applications submitted by Scottish Power Renewables (hereafter 'the applicant') for the East Anglia ONE North (EA1N) and East Anglia TWO (EA2) offshore windfarms and associated onshore infrastructure. Although the two schemes are subject to separate DCO applications, they are closely linked and have many elements of their onshore infrastructure in common. In particular, both schemes share an onshore cable route and are intended to feed power into an adjacent pair of substations and a National Grid substation, together with associated infrastructure, to be located on land to

the north of Friston village centre. Specifically, I have been requested to review the heritage impacts identified by the applicant as resulting from the construction of one or both substations and the National Grid substation and connection infrastructure at Friston.

1.4 In preparing this report, I have reviewed all of the relevant submitted documents, with a particular emphasis on the following documents and their supporting technical appendices:

- Document 6: Environmental Statement
 - Chapter 4: Site Selection and Assessment of Alternatives
 - Chapter 6: Project Description
 - Chapter 16: Marine Archaeology and Cultural Heritage
 - Chapter 24: Archaeology and Cultural Heritage
- Document 8.5: Outline WSI Archaeology and Cultural Heritage (Onshore)
- Document 8.6: Outline WSI Archaeology and Cultural Heritage (Offshore)
- Document 8.7: Outline Landscape and Ecological Management Strategy
- Document 8.20: Outline Pre-Commencement Archaeological Execution Plan

1.5 I undertook an accompanied site visit with members of SASES in March 2020 and have familiarised myself with the historic landscape of Friston and its surroundings and the heritage assets within it. In doing so, I have paid particular attention to the contribution which the proposed site of the substations, National Grid substation and connection infrastructure makes to the setting of those heritage assets.

1.6 This report begins by reviewing the relevant policy framework under which the pair of DCO applications will be determined, with a particular emphasis on those aspects of legislation, planning policy and guidance which relate to archaeological and cultural heritage matters (Section 2). This is followed by a critical assessment of the baseline archaeological and cultural heritage data which has been collated as part of the application process (Section 3).

Section 4 critically assesses the process via which the potential heritage impacts of the proposed schemes have been identified and assessed. Section 5 reviews and revises the submitted impact assessments made of each of the designated heritage assets which will be affected by the operational phase of the proposed schemes due to changes to their settings. These comprise seven listed buildings – two listed at Grade II* and five at Grade II – in the vicinity of the proposed substations at Friston. Section 6 presents a summary of the conclusions of this report.

2 Relevant Legislation, Policy and Guidance

- 2.0.1 Under the terms of the Planning Act 2008, as a Nationally Significant Infrastructure Project (NSIP) the DCO applications for the EA1N and EA2 windfarms and associated onshore infrastructure will be determined at a national level by the Secretary of State, following examination and recommendations by the Planning Inspectorate. With specific regard to designated heritage assets, reference also needs to be made to the Planning (Listed Buildings and Conservation Areas) Act 1990 and the Infrastructure Planning (Decisions) Regulations 2010.
- 2.0.2 DCO applications are determined within the context of the relevant National Policy Statements (NPSs), with the primary policy basis for windfarm projects being informed by the *Overarching National Policy Statement for Energy (EN-1)* (DECC 2011a), the *National Policy Statement for Renewable Energy Infrastructure (EN-3)* (DECC 2011b) and the *National Policy Statement for Electricity Networks Infrastructure (EN-5)* (DECC 2011c).
- 2.0.3 Although the primary policy basis for determining the EA1N and EA2 DCO applications is contained within NPSs EN-1, EN-3 and EN-5, the extent to which the National Planning Policy Framework (NPPF; DCLG 2019) is deemed a material consideration is a matter for the examining authority and the Secretary of State.
- 2.0.4 Summary details of the relevant legislation and policies as they pertain to the issues considered here are set out below, together with the statutory guidance pertaining to assessing the setting of heritage assets.

2.1 Legislation

2.1.1 *Planning Act 2008*

2.1.1.1 Section 104 of the Planning Act 2008 concerns decisions in cases where one or more National Policy Statement has effect.¹ Of particular relevance to the current applications, subsection 3 of Section 104 instructs that:

- Section 104.3: 'the Secretary of State must decide the application in accordance with any relevant national policy statement, except to the extent that one or more of subsections (4) to (8) applies'.

In the list which follows, subsection 7 states that:

- Section 104.7: 'this subsection applies if the Secretary of State is satisfied that the adverse impact of the proposed development would outweigh its benefits.'

2.1.1.2 The adverse heritage impact of any proposed scheme is therefore a material consideration in determining DCO applications.

2.1.2 *Planning (Listed Buildings and Conservation Areas) Act 1990*

2.1.2.1 Legislation pertaining to buildings and areas of special architectural and historic interest is contained within the Planning (Listed Buildings and Conservation Areas) Act 1990.

2.1.2.2 Section 66(1) of the 1990 Act states that:

in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

¹ <https://www.legislation.gov.uk/ukpga/2008/29/section/104>

2.1.2.3 In the 2014 Court of Appeal judgement in relation to the Barnwell Manor Wind Energy Ltd v East Northants DC, English Heritage, National Trust and SSCLG,² Lord Justice Sullivan held that:

[2014] EWCA Civ 137, Para. 24: Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise.

2.1.2.4 In a second 2014 Court of Appeal judgement in relation to Jones v Mordue, SOSCLG and South Northants Council,³ Lord Justice Sales clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134, now paragraph 196 of the revised NPPF), this is in keeping with the requirements of the 1990 Act.

2.1.3 Infrastructure Planning (Decisions) Regulations 2010

2.1.3.1 The requirements of Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 are echoed in the Infrastructure Planning (Decisions) Regulations 2010.⁴

2.1.3.2 With specific relevance to the issues addressed in this report, section 3 (1) of the 2010 Regulations states that:

When deciding an application which affects a listed building or its setting, the decision-maker [i.e. the Secretary of State] must have regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses.

² [2014] EWCA Civ 137: <https://www.bailii.org/ew/cases/EWCA/Civ/2014/137.html>

³ [2015] EWCA Civ 1243: <https://www.bailii.org/ew/cases/EWCA/Civ/2015/1243.html>

⁴ <https://www.legislation.gov.uk/uksi/2010/305/contents/made>

2.2 Planning Policy

2.2.1 NPS EN-1: Overarching National Policy Statement for Energy

2.2.1.1 NPS EN-1 is the *Overarching National Policy Statement for Energy* (DECC 2011a). Policies pertaining to the historic environment are contained within Section 5.8 of NPS EN-1 and they mirror the then-current approach to heritage planning which was contained within Planning Policy Statement 5 (PPS5), published by the Department for Communities and Local Government in 2010 (DCLG 2010). PPS5 has since been superseded by the National Planning Policy Framework, first published in 2012 and revised in 2018 and 2019 (MCLG 2019). The relevant paragraphs of the NPPF are also reproduced below.

2.2.1.2 The opening paragraph of Section 5.8 of NPS EN-1 recognises that 'the construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment' (Para. 5.8.1).

2.2.1.3 On the subject of what constitutes a heritage asset, NPS EN-1 states that:

- Para. 5.8.2: Those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called 'heritage assets'. A heritage asset may be any building, monument, site, place, area or landscape, or any combination of these. The sum of the heritage interests that a heritage asset holds is referred to as its significance.

2.2.1.4 In recognising designated heritage assets, NPS EN-1 states that:

- Para. 5.8.3: Some heritage assets have a level of significance that justifies official designation. Categories of designated heritage assets are: a World Heritage Site; Scheduled Monument; Protected Wreck Site; Protected Military Remains, Listed Building; Registered Park and Garden; Registered Battlefield; Conservation Area; and Registered Historic Landscape (Wales only).

2.2.1.5 NPS EN-1 also recognises that non-designated heritage assets may have equivalent significance in the decision-making process. This is set out in the following paragraphs.

- Para. 5.8.4: There are heritage assets with archaeological interest that are not currently designated as Scheduled Monuments, but which are demonstrably of equivalent significance.
- Para. 5.8.5: The absence of designation for such heritage assets does not indicate lower significance. If the evidence before the Infrastructure Planning Commission (IPC) indicates to it that a non-designated heritage asset of the type described in 5.8.4 may be affected by the proposed development then the heritage asset should be considered subject to the same policy considerations as those that apply to designated heritage assets.
- Para. 5.8.6: The IPC should also consider the impacts on other non-designated heritage assets, as identified either through the development plan making process (local listing) or through the IPC's decision making process on the basis of clear evidence that the assets have a heritage significance that merits consideration in its decisions, even though those assets are of lesser value than designated heritage assets.

2.2.1.6 Having established this baseline, NPS EN-1 then sets out the level of information required to be provided by the applicant in order to enable an informed decision to be made:

- Para. 5.8.8: As part of the Environmental Statement the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance.
- Para. 5.8.9: Where a development site includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, representative visualisations may be necessary to explain the impact.

- Para. 5.8.10: The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents.

2.2.1.7 Finally, in considering applications, the IPC is directed to take the following factors into account before taking a decision:

- Para. 5.8.11: In considering applications, the IPC should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development, including by development affecting the setting of a heritage asset.
- Para. 5.8.12: In considering the impact of a proposed development on any heritage assets, the IPC should take into account the particular nature of the significance of the heritage assets and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between conservation of that significance and proposals for development.
- Para. 5.8.13: The IPC should take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution they can make to sustainable communities and economic vitality. The IPC should take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials and use.
- Para. 5.8.14: There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. ... Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification.
- Para. 5.8.15: Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss.

- Para. 5.8.18: When considering applications for development affecting the setting of a designated heritage asset, the IPC should treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the IPC should weigh any negative effects against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval.

2.2.2 NPS EN-3: Renewable Energy Infrastructure

2.2.2.1 NPS EN-1 is complemented by NPS EN-3, which also applies to the current applications. NPS EN-3 pertains to *Renewable Energy Infrastructure*, but does not contain any further specific references to matters relating to the historic environment. Instead, the NPS clearly indicates that the statements contained within EN-1 are applicable:

- Para. 1.3.2: This NPS does not seek to repeat the material set out in EN-1, which applies to all applications covered by this NPS unless stated otherwise. The reasons for policy that is specific to the energy infrastructure covered by this NPS are given, but where EN-1 sets out the reasons for general policy these are not repeated.

2.2.3 NPS EN-5: Electricity Networks Infrastructure

2.2.3.1 NPS EN-5 pertains to *Electricity Networks Infrastructure* and is also applicable to the current applications. As with EN-3, the NPS clearly indicates that the statements contained within EN-1 are applicable, with a duplicated paragraph 1.3.2 (see above). However, NPS EN-5 also makes additional specific references to heritage assets and archaeology.

2.2.3.2 The first reference is made in the context of the Appraisal of Sustainability applied to the NPSs, where it is stated that:

- Para. 1.7.5: Assessment showed that alternative (b) [that is, the adoption of a presumption that electricity lines should be put underground] would have effects similar to those of EN-5 policies for climate change, but that it was likely to have negative effects on the security of supply and economic objectives. Effects on soil, water, ecology and archaeology are

likely to be negative, at least in the short term, requiring significant mitigation, but there is uncertainty around long term effects depending on the specific location and the sensitivity of the receiving environment.

2.2.3.3 The second reference occurs in the context of factors influencing site/route selection by applicants for electricity networks NSIPs. NPS EN-5 states that:

- Para. 2.2.6: As well as having duties under section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), developers will be influenced by Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to “have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and ... do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.” Depending on the location of the proposed development, statutory duties under section 85 of the Countryside and Rights of Way Act 2000 and section 11A of the National Parks and Access to the Countryside Act 1949 may be relevant.

2.2.3.4 The third reference again occurs in relation to undergrounding in the context of the potential Landscape and Visual impact of a proposed scheme. Here, it is stated that:

- Para 2.8.9: The impacts and costs of both overhead and underground options vary considerably between individual projects (both in absolute and relative terms). Therefore, each project should be assessed individually on the basis of its specific circumstances and taking account of the fact that Government has not laid down any general rule about when an overhead line should be considered unacceptable. The IPC should, however only refuse consent for overhead line proposals in favour of an underground or sub-sea line if it is satisfied that the benefits from the non-overhead line alternative will clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable. In this context it should consider:

... the environmental and archaeological consequences (undergrounding a 400kV line may mean disturbing a swathe of ground up to 40 metres across, which can disturb sensitive habitats, have an impact on soils and geology, and damage heritage assets, in many cases more than an overhead line would).

2.2.4 The National Planning Policy Framework

2.2.4.1 Designated and non-designated heritage assets are given protection under the NPPF. A revised version of the NPPF was published by the Ministry of Housing, Communities and Local Government in July 2018, replacing the original Framework which was published by the Department for Communities and Local Government in 2012. Minor updates were made to the NPPF in February 2019, although these did not affect the sections pertaining to heritage.

2.2.4.2 The historic environment is considered in Section 16 of the NPPF, which directs Local Planning Authorities to set out 'a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats' (NPPF para. 185). The aim is to ensure that Local Planning Authorities, developers and owners of heritage assets adopt a consistent approach to their conservation and to reduce complexity in planning policy relating to proposals that affect them.

2.2.4.3 Specifically, the approach taken to the management of heritage assets within the planning process is set out in the following paragraphs:

- Para. 189: In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- Para. 190: Requires the applicant to 'identify and assess the particular significance of any heritage asset that may be affected by a proposal

(including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise'.

- Para. 193: When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- Para. 194: Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- Para. 196: Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- Para. 197: The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

2.2.5 East Suffolk Council – Suffolk Coastal Local Plan

2.2.5.1 The East Suffolk Council – Suffolk Coastal Local Plan was adopted on 23rd September 2020. It applies to the part of East Suffolk formerly covered by the Suffolk Coastal district. The Local Plan sets out the level of growth which needs to be planned in the area and identifies where that growth should be located and how it should be delivered. The Local Plan sets out the planning policies which the Council will use to determine planning applications in the Suffolk Coastal area. The Suffolk Coastal Local Plan covers the period 2018–2036.

2.2.5.2 Section 11 of the Local Plan concerns the Built and Historic Environment, paragraph 11.20 of which states that:

the acknowledged quality of the built, natural and historic environments within the former Suffolk Coastal area is one of its key assets, making it an attractive area to live, work and visit.'

2.2.5.3 The Council's approach to the historic environment is set out in Policy SCLP11.3, which indicates that:

The Council will work with partners, developers and the community to conserve and enhance the historic environment and to ensure that where possible development makes a positive contribution to the historic environment. The policies of the National Planning Policy Framework will be applied in respect of designated and non-designated heritage assets.

2.2.5.4 With specific regard to listed buildings, Policy SCLP11.4 states that:

Proposals to alter, extend or change the use of a listed building (including curtilage listed structures) or development affecting its setting will be supported where they:

- a) Demonstrate a clear understanding of the significance of the building and its setting alongside an assessment of the potential impact of the proposal on that significance;
- b) Do not harm the character of the building or any architectural, artistic, historic, or archaeological features that contribute towards its special interest;
- c) Are of an appropriate design, scale, form, height, massing and position which complement the existing building;
- d) Use high quality materials and methods of construction which complement the character of the building;
- e) Retain the historic internal layout of the building; and

f) Remove existing features that detract from the building to enhance or better reveal its significance.

2.2.5.5 The Council is also currently working on a new Supplementary Planning Document focussing on the historic environment which will provide further guidance on the implementation of planning policy, including practical planning guidance for developers and homeowners who are either planning new development or making changes to an existing property. It will also cover topics not included in previous guidance, such as energy efficiency and adapting to climate change.

2.3 Planning Guidance

2.3.1 *National Planning Practice Guidance*

2.3.1.1 The NPPF is complemented by a series of National Planning Practice Guidance documents, which includes specific guidance on the application of the NPPF to the historic environment, published in 2014 and updated in July 2019.⁵

2.3.1.2 On the subject of how proposals can avoid or minimise harm to the significance of a heritage asset, the guidance states that:

analysis of relevant information can generate a clear understanding of the affected asset, the heritage interests represented in it, and their relative importance (Paragraph: 008 Reference ID: 18a-008-20190723).

2.3.1.3 The guidance goes on to state that:

applicants should include analysis of the significance of the asset and its setting, and, where relevant, how this has informed the development of the proposals. The level of detail should be proportionate to the asset's importance and no more than is sufficient

⁵ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>

to understand the potential impact of the proposal on its significance (Paragraph: 009 Reference ID: 18a-009-20190723).

2.3.1.4 With specific regard to the setting of heritage assets, the guidance states that:

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. (Paragraph: 013 Reference ID: 18a-013-20190723).

2.3.1.5 On the public accessibility of the setting of a heritage asset, the guidance states that:

the contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. (Paragraph: 013 Reference ID: 18a-013-20190723).

2.3.1.6 A recent Court of Appeal judgement in relation to Catesby Estates Ltd v Steer⁶ has confirmed that, whilst issues of visibility are important when assessing setting, other factors should also be considered. Lord Justice Lindblom stated at paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement):

⁶ [2018] EWCA Civ 1697: <https://www.bailii.org/ew/cases/EWCA/Civ/2018/1697.html>

- Para. 25: But – again in the particular context of visual effects – I said that if “a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one’s experience of the listed building in its surrounding landscape or townscape” (paragraph 56).
- Para. 26: This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building’s setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations ... But it is clear from the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a-013-20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical. These other considerations may include, for example, “the historic relationship between places”. Historic England’s advice in GPA3 was broadly to the same effect.

2.3.2 *The Setting of Heritage Assets*

2.3.2.1 The GPA3 referred to in the Steer judgement is Historic England’s Historic Environment Good Practice Advice in Planning 3 (2nd edition), *The Setting of Heritage Assets*, which was published in 2017. This document sets out a five-step process to the identification, assessment and mitigation of the impacts upon the significance of heritage assets through changes in their setting. Specifically, these steps are:

- Step 1: Identify which heritage assets and their settings are affected.
- Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it.

- Step 4: Explore ways to maximise enhancement and avoid or minimise harm.
- Step 5: Make and document the decision and monitor outcomes.

2.3.2.2 GPA3 acknowledges that 'the contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset' (para. 10). However, GPA3 also includes a non-exhaustive checklist of potential attributes of a setting that may help to elucidate its contribution to significance (Assessment Step 2 Checklist, p. 11).

2.3.2.3 With regard to the elements of the heritage asset's physical surroundings which may contribute towards its significance, GPA3 lists the following:

- Topography
- Aspect
- Other heritage assets (including buildings, structures, landscapes, areas or archaeological remains)
- Definition, scale and 'grain' of surrounding
- streetscape, landscape and spaces
- Formal design e.g. hierarchy, layout
- Orientation and aspect
- Historic materials and surfaces
- Green space, trees and vegetation
- Openness, enclosure and boundaries
- Functional relationships and communications
- History and degree of change over time

2.3.2.3 With regard to the elements which might contribute towards or detract from the experience of a heritage asset, GPA3 lists the following:

- Surrounding landscape or townscape character
- Views from, towards, through, across and including the asset
- Intentional intervisibility with other historic and natural features
- Visual dominance, prominence or role as focal point
- Noise, vibration and other nuisances

- Tranquillity, remoteness, 'wildness'
- Busyness, bustle, movement and activity
- Scents and smells
- Diurnal changes
- Sense of enclosure, seclusion, intimacy or privacy
- Land use
- Accessibility, permeability and patterns of movement
- Degree of interpretation or promotion to the public
- Rarity of comparable survivals of setting
- Cultural associations
- Celebrated artistic representations
- Traditions

2.3.2.4 Such is the framework of legislation, national and regional planning policy and guidance pertaining to heritage assets within which the EA1N and EA2 DCO applications are to be determined. The following sections examine how these principles have been applied to the historic environment of Friston in the submitted application documents.

3 Review of Baseline Archaeological Data

- 3.0.1 The archaeological and cultural heritage impacts of the proposed EA1N and EA2 schemes fall into two main categories – the offshore marine element and the onshore terrestrial element – and these are considered separately in both sets of the submitted application documents. The assessment of the marine element is set out in Chapter 16 – *Marine Archaeology and Cultural Heritage* – in Volume 1 of each Environmental Statement, while the assessment of the terrestrial element is set out in Chapter 24 – *Archaeology and Cultural Heritage* – of each Environmental Statement. Each chapter is supported by numerous figures in Volume 2 of the Environmental Statement and technical appendices in Volume 3.

3.1 Marine Archaeology and Cultural Heritage

- 3.1.1 Given the different locations of the proposed EA1N and EA2 offshore windfarms, the pair of *Marine Archaeology and Cultural Heritage* assessments focus on different areas of the seabed intended for the sites of the turbines and their respective cable corridors, which converge at a single onshore connection point.
- 3.1.2 An assessment and critique of the *Marine Archaeology and Cultural Heritage* assessments falls outside the scope of my instruction from SASES. However, as the statutory body responsible for overseeing England's marine archaeological resource, Historic England indicated in their Relevant Representation that they will be addressing the issues raised by the submitted EA1N and EA2 assessments in more detail, and I would endorse their comments and conclusions on these matters.

3.2 Terrestrial Archaeology and Cultural Heritage

- 3.2.1 Both the EA1N and EA2 schemes make a single landfall and share an onshore cable corridor route. This is intended to feed power into an adjacent pair of substations, accompanying National Grid substation and supporting infrastructure which would be constructed on land to the north of Friston village centre.

- 3.2.2 Chapter 24 of both Environmental Statements sets out the baseline conditions for the historic environment within and surrounding the onshore development area. This is based on two main sources of information, the first being an *Archaeological and Cultural Heritage Desk-Based Assessment* produced by Headland Archaeology in 2018 and submitted as Appendix 24.3 to each of the Environmental Statements. This desk-based assessment was undertaken before the currently proposed locations for the onshore infrastructure had been finalised and the results of the desk-based assessment consequently informed the site selection process as well as the submitted Environmental Statements. As a desk-based assessment, it brings together all of the known archaeological and cultural heritage evidence for the area, but by its very nature cannot provide an understanding of any as-yet-unknown archaeological or cultural heritage evidence which might lie within the area. For this reason, as is set out in paragraph 5.8.9 of NPS EN-1, desk-based assessments alone are not considered to be sufficient to assess the archaeological and cultural heritage potential of the area, and are usually required to be complemented by archaeological fieldwork.
- 3.2.3 In order to complement the desk-based assessment, a limited degree of fieldwork has been undertaken in the form of a geophysical survey of the onshore development area. This was completed by Headland Archaeology in 2019 and a report is included as Appendix 24.4 to each Environmental Statement. This is the second source of information for the Environmental Statement. This survey has been carried out in consultation with the Suffolk County Council Archaeological Service (SCCAS) and the areas which have not been surveyed are stated by the applicant to be either not accessible or not conducive to survey. As a result, at the point of submission approximately 64% of the onshore development area had been subject to geophysical survey. Breaking this coverage down further, it is stated that 61% of the landfall location, 88% of the onshore cable corridor and 90% of the sub-station and National Grid substation have so far been subject to geophysical survey (ES para. 24.1.6). This means that 36% of the onshore

development area – a substantial proportion – has not yet been subject to geophysical survey and has only been assessed as part of the desk-based assessment. Where areas are not considered to be conducive to geophysical survey, they have apparently not been subject to any alternative form of archaeological evaluation, such as trial trenching.

- 3.2.4 The archaeological desk-based assessment (Appendix 24.3) and the geophysical survey (Appendix 24.4) are the main sources of information for potential below-ground remains within the onshore development area, including the cable route and the substation areas. Given their limitations, there is a clear need for a considerable amount of further archaeological evaluation to be undertaken in order to inform the DCO application process.
- 3.2.5 The applicant does acknowledge the need for this further work, and both sets of submitted application documents include an *Outline Written Scheme of Investigation: Onshore* (DCO Document 8.5), which sets out a strategy for archaeological trial trenching, earthwork identification and metal-detecting to inform the post-consent mitigation strategy, the headline details of which are also set out in the *Outline Pre Commencement Archaeology Execution Plan (Onshore)* (DCO Document 8.20). A detailed assessment of the results of the geophysical survey and the identification of a series of archaeological areas requiring further fieldwork are set out in detail in Chapter 24 of both Environmental Statements. However, throughout all of these documents there is a presumption that these fieldwork elements will be carried out post-consent, but before the commencement of any development work, and not ahead of the DCO decision being made.
- 3.2.6 It is widely recognised that geophysical survey alone (in this case, magnetometry) does not offer a sufficiently detailed set of results to enable the full and confident characterisation of buried archaeological features. Indeed, many classes of archaeological feature and deposit, including human burials, are not readily identifiable in this fashion. It is encouraging that the need for further investigative work, such as trial trenching, is acknowledged by the applicant and that consultations with the SCCAS are

ongoing. As the statutory body responsible for managing the archaeological impacts of development in the county, I would support the position of the SCCAS in these discussions. However, the fact remains that the material contained within the desk-based assessment and the geophysical survey do not as yet provide sufficient tangible detail of the nature, character and extent of the buried archaeological resource within the proposed onshore development areas, including the site of the substations at Friston.

- 3.2.7 Paragraph 5.8.9 of NPS EN-1 clearly states that where a development site includes or has the potential to include heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. In projects of this magnitude and complexity, it is reasonable to expect at least a programme of trial trenching to be undertaken before any consent is granted in order to test and confirm the results of the geophysical survey, evaluate areas which could not be surveyed, and inform the decision-making process, rather than simply to inform the post-consent mitigation strategy.
- 3.2.8 The fact that such fieldwork has not been undertaken by the applicant to date represents a major shortcoming in the assessment of the known and potential archaeological resource of the onshore development area, including the landfall, cable routes and the substation sites, and as such the applications as they currently stand invite the making of a poorly informed decision with regard to the potential impact of the proposed scheme on the buried archaeological resource. By failing to provide the required level of detail, the applicant is failing in their stated duty under paragraph 5.8.10 of NPS EN-1, specifically that they 'should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents.'

4 Identification of Impacts

- 4.1 Chapter 24 of both the EA1N and EA2 Environmental Statements concerns the onshore archaeology and cultural heritage of the proposed schemes. These chapters assess the potential impacts of the proposed scheme upon the onshore historic environment and heritage assets, and describes the embedded and potential mitigation methods which have already been or will be applied as the proposed projects progress.
- 4.2 Although the EA1N and EA2 schemes are presented as two separate DCO applications, because of the interrelationship between the onshore elements of both schemes the submitted Environmental Statements consider the cumulative impact of the proposed EA1N and EA2 schemes individually and together, with additional consideration of other proposed developments (ES para. 24.1.12). Given that both schemes share their onshore elements, the heritage content of both Environmental Statements is essentially identical, and the comments and critique offered here apply equally to both documents.
- 4.3 The full details of the various phases and requirements of the proposed development, including the temporary and permanent structures associated with each phase, are described in Chapter 6 – *Project Description* – of the Environmental Statements. These are summarised in submitted Table 24.2, which lists all of these elements and presents a detailed list of what are described as 'realistic worst case scenarios' relating to the impacts likely to be caused by the construction, operation and decommissioning phases of the proposed development. These are sub-divided into those affecting the landfall, the cable route, the onshore substation and the National Grid infrastructure.
- 4.4 Under the impacts caused by the construction phase of the project, Table 24.2 specifically identifies the following:
- Landfall: The effect on the significance of heritage assets, as a result of change in their setting, owing to the establishment and presence of the

temporary, surfaced and fenced landfall CCS [construction consolidation sites], HDD [horizontal directional drilling] temporary works area, associated security and task lighting and the presence of the HDD drilling rig, ducting materials and welfare facilities.

- Cable route: The effect on the significance of heritage assets, as a result of change in their setting, owing to the establishment, presence and activity associated with the temporary, surfaced and fenced CCS, and HDD temporary working areas, and their content of plant, materials and welfare facilities, and the temporary access roads.
- Substation: The effect on the significance of heritage assets, as a result of change in their setting, owing to the establishment and presence of the emerging onshore substation with building height up to 15m, electrical infrastructure height up to 18m (such as shunt reactors, transformers, harmonic filters, etc.).
- National Grid infrastructure: The effect on the significance of heritage assets, as a result of change in their setting, owing to the establishment and presence of the emerging National Grid substation with Air Insulated Substation (AIS) building up to 6m in height, and external equipment to connect to the overhead line of 16m in height.

4.5 It should be noted that each of the sub-sections of the construction phases includes a long list of working areas, constructions consolidation sites and enabling works, covering a very large footprint. It should also be noted that this summary only gives the dimensions and impact of a single sub-station, for either EA1N or EA2, and not the combined totals for the two schemes.

4.6 No indication of timescale for the construction phase is given in this table, features only being referred to as 'temporary' or 'permanent', but details included in Chapter 6 of the Environmental Statement – *Project Description* – indicate that the construction of the landfall is likely to last 12 months, the cable route 24 months, the substation up to 30 months and the construction of the National Grid substation up to 48 months, with realignment of the overhead power lines taking 12 months. Commissioning and reinstatement of land following the construction phase are expected to take an additional 12 months (ES Sections 6.9.1–7). Overall, then, the construction programme is presumed to last at least five years, meaning that any of the 'temporary'

impacts on heritage assets identified as belonging to this phase are going to be of several months' if not several years' duration.

4.7 Under the impacts caused by the operational phase of the project, Table 24.2 identifies the following:

- Landfall: No impacts.
- Cable Route: No above ground infrastructure.
- Substation: An operational footprint of 190m x 190m served by a 1.7km long and 8m wide access road. The effect on the significance of heritage assets, as a result of change in their setting, owing to the presence of the onshore substation with buildings up to 15m in height and electrical infrastructure up to 18m.
- National Grid infrastructure: An operational footprint of 310m x 145m together with 10,000m² for three cable sealing end compounds, all serviced by a 500m x 3.7m access road. The effect on the significance of heritage assets, as a result of change in their setting, owing to the presence of the National Grid substation with Air Insulated Substation (AIS) building up to 6m in height, and external equipment to connect to the overhead line of 16m in height.

4.8 Again, it should be noted that this summary only gives the dimensions and impact of a single substation, for either EA1N or EA2, and not the combined totals for the two schemes, for which the impact would be greater.

4.9 It is generally accepted, and I agree, that once the landfall and cable route infrastructure has been installed it will have no further impact upon buried or upstanding heritage assets during its operational phase, until the scheme is decommissioned. However, as discussed above in Section 3, there remains a need to properly evaluate and mitigate the impact which the installation of the cable run will have upon any heritage assets, particularly buried archaeological features, in order to inform the decision-making process.

4.10 The third phase of impacts summarised in Table 24.2 pertain to the decommissioning phase, but no indication of the potential impact of the decommissioning process on heritage assets is presented by the applicant.

The reason given is that no decision has been made regarding the final decommissioning policy for the onshore infrastructure, but it is stated that 'impacts no greater than those identified for the construction phase are expected for the decommissioning phase' (ES Table 24.2). This lack of a detailed decommissioning process is a significant omission, and this very cursory assessment of the potential heritage impacts of the decommissioning process is not sufficient to assess the likely heritage impacts of this phase of the scheme. The reversibility of the scheme is heralded as a key part of its sustainability and cited as a major factor in mitigating the impacts identified during the construction and operational phases of the scheme, but without details of the likely scope, scale and nature of the decommissioning works being presented it is impossible to make a suitably informed decision on the overall heritage impact of the scheme from beginning to end.

- 4.11 In line with paragraph 5.8.1 of NPS EN-1, it is clearly acknowledged by the applicant that the construction, operation and decommissioning of the onshore infrastructure will have an impact upon the settings of surrounding heritage assets. Under the heading of *Potential Impacts* (EA1N ES section 24.6), paragraph 158 states that:

Indirect (non-physical) impacts on the historic environment, as stated in NPS EN-3 (DECC 2011b: 67), include heritage assets being affected by change in their setting. Indirect (non-physical) impacts upon significance as a result of change in the setting of heritage assets have the potential to occur throughout the lifetime of the proposed East Anglia ONE North project, thus encompassing all phases, from construction, into operation and subsequent decommissioning. Indirect non-physical impacts upon the setting of heritage assets are most relevant as a result of the presence of above ground infrastructure for the proposed East Anglia ONE North land project during the operational phase, the effects of which may be long-term or 'permanent' in nature. Indirect non-physical impacts upon the setting of heritage assets may also arise as a result of construction

and decommissioning works, although effects will be, by comparison, shorter in duration and of a temporary nature, and as such it is considered that only changes in setting due to the operation of the proposed East Anglia ONE North project would be of sufficient duration to merit detailed assessment, see Appendix 24.7.

4.12 This is expanded upon further in paragraph 216, which states that:

Activities undertaken as part of construction works for the proposed East Anglia ONE North project have the potential to impact designated and non-designated heritage assets in an indirect (non-physical) manner, associated with change in their setting. Temporary indirect non-physical impacts resulting from change in the setting of heritage assets, should they occur, may do so through the presence of machinery, construction traffic and general construction activities taking place within the onshore development area. The sight, sound, any dust created, and even smell, during the construction phase has the potential to indirectly (non-physically) impact the setting of heritage assets and their associated heritage significance.

4.13 The relevant sections of the EA2 Environmental Statement contain the same texts, barring references to the EA2 project.

4.14 There is, then, a fundamental contradiction in the submitted application documents between those sections of the Environmental Statements quoted above, which clearly identify a detrimental impact on heritage assets which will be caused by the construction, operation and decommissioning of the onshore infrastructure, and the submitted assessment of heritage impacts (Appendix 24.7), which focusses only on the impact of the operational phase of the scheme and does not consider the likely impacts which are due to be caused by the construction or decommissioning of the schemes' infrastructure. Paragraph 217 of both Environmental Statement states that:

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. Indirect (non-physical) impacts as a result of change in the setting of heritage assets during the construction phase have therefore been excluded from further consideration (i.e. no impact).

- 4.15 Although some, but by no means all, of the construction impacts will be temporary, they are still due to last for a period of several years and the proposed working area covers a significantly larger footprint than the operational phase of the proposed schemes. In many cases, the boundaries of the construction area lie in very close proximity to heritage assets, where they will arguably have a much greater impact than some of the later, operational phases of the proposed scheme.
- 4.16 By failing to provide the required level of detail, the applicant is again failing in their stated duty under paragraph 5.8.10 of NPS EN-1 to 'ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents.' Concluding that there will be 'no impact' and dismissing the heritage impacts likely to be caused by the construction phase as set out in the preceding paragraphs of their own report demonstrates a clear failure on the part of the applicant to adequately quantify and assess the heritage impacts across the full duration of the scheme. As a consequence, on the basis of the documents submitted to date it is not possible for an informed decision to be made about the overall heritage impact of the scheme.

5 Impact on the Setting of Heritage Assets

- 5.0.1 Having identified the shortcoming of the submitted application documents with regard to the baseline archaeological data (Section 3) and the identification of the likely heritage impacts of the construction, operation and decommissioning phases of the proposed projects (Section 4), this section considers the heritage impact assessments which have been submitted for the designated heritage assets which surround the site of the proposed substations, National Grid substation and supporting infrastructure at Friston.
- 5.0.2 Having limited their assessment of the heritage impact of the proposed schemes solely to their operational phases, the applicant sets out their assessment of the heritage impact of the proposed schemes on the settings of adjacent heritage assets in section 24.6.2.1 of both Environmental Statement. The content of this assessment is informed by the results of the *Onshore Archaeology and Cultural Heritage Desk-based Assessment* undertaken in 2018 and submitted as Appendix 24.3 to both applications, and the subsequent *Assessment of the Impact of Onshore Infrastructure in the Setting of Heritage Assets* written in 2019 and submitted as Appendix 24.7 to both applications.

5.1 Identifying Affected Settings

- 5.1.1 Setting is defined in the NPPF as:

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of the asset, may affect the ability to appreciate that significance or may be neutral.

- 5.1.2 Changes to the setting of a heritage asset have the potential to affect the contribution which setting makes to the significance of the heritage asset. It follows that any changes to the setting of a heritage asset may result in positive, neutral or negative impacts upon the significance of the heritage

asset. In some circumstances it may be possible to apply mitigation methods which serve to maximise enhancement and/or minimise or reduce harm.

5.1.3 In order to assess the likely impact of the scheme, the applicant has followed the five-step process for assessing and mitigating impacts upon the setting of heritage assets, as set out in Historic England's Historic Environment Good Practice Advice in Planning 3 (GPA3; 2nd edition), published in 2017. Specifically, these steps are:

- Step 1: Identify which heritage assets and their settings are affected.
- Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it.
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm.
- Step 5: Make and document the decision and monitor outcomes.

5.1.4 As is set out in the Environmental Statements, the EA1N and EA2 DCO applications are presented on the assumption that the EA1N substation will be located on the eastern of the two identified locations, while the EA2 substation will be located on the western location. For the purposes of the heritage impact assessment, three different operational arrangements were considered: EA1N alone, EAS2 alone and the cumulative impact of EA1N and EA2 together. All three combinations of substation will include the National Grid substation, associated infrastructure and link roads.

5.1.5 Based on the premise that either the EA1N or EA2 schemes or both the EA1N and EA2 schemes would be granted consent, the initial desk-based assessment identified two discrete areas in which the operation of onshore infrastructure would lead to material change in the setting of heritage assets. It concluded that the impact on the settings of six designated

heritage assets, all of them Listed Buildings, would need to be assessed in more detail. However, following discussions with the Archaeology and Cultural Heritage Expert Topic Group, two additional listed buildings – one listed at Grade II* and the other at Grade II – were brought into scope, expanding this list to eight designated heritage assets, split across the two locations. These are the heritage assets which form the subject of the second, more detailed assessment (Appendix 24.7).

5.1.6 The first of the two main areas identified by applicant in which the operation of onshore infrastructure would lead to detrimental impacts on the settings of designated heritage impact was land in the vicinity of the proposed onshore substations, National Grid substation and supporting infrastructure at Friston, which is surrounded by seven Grade II*- and Grade II-listed buildings (Figure 1). Specifically, the seven listed buildings identified as being affected by the proposed new substations and infrastructure are:

- The Church of St Mary, Friston (National Heritage List Entry No. 1287864) Grade II*
- Friston War Memorial (National Heritage List Entry No. 1435814) Grade II
- Woodside Farmhouse (National Heritage List Entry No. 1215744) Grade II
- Friston House (National Heritage List Entry No. 1216066) Grade II
- Little Moor Farm (National Heritage List Entry No. 1215743) Grade II
- High House Farm (National Heritage List Entry No. 1216049) Grade II
- Friston Post Mill (National Heritage List Entry No. 1215741) Grade II*

5.1.7 The Grade II-listed 'Numbers 1 and 2 (Church Walls), Number 3 and Number 4 (Church Walls Cottage)' which stand 50m to the south-west of the church (Figure 1) were not considered by the applicant or the Archaeology and Cultural Heritage Expert Topic Group to be likely to be impacted upon by the proposed substations, primarily due to the limited nature of their setting, and, as such, they were not included in the subsequent assessment.



Figure 1. The locations of the designated heritage assets discussed in the text. Scale 1:10,000.

- 5.1.8 The second area of heritage impact identified by the applicant pertains to a section of the onshore cable route in an area of woodland immediately to the south of Grade II-listed Aldringham Court (National Heritage List Entry No. 1393143). Here, the construction of the cable route will require the permanent removal of a corridor of woodland which forms part of the setting of the listed building. Aldringham Court lies some 3km to the west of Friston, approximately half way between Friston and the coast, and a critical review of the likely heritage impact of this element of the proposed scheme lies outside the scope of my instruction from SASES.
- 5.1.9 In my professional opinion, the above list of heritage assets is an accurate identification of the designated heritage assets which would be affected by the proposed substation developments at Friston. However, as is discussed below, I disagree with the assessment of the severity of the likely heritage impacts of the proposed schemes as set out by the applicant in the submitted documents.

5.2 Assessing Heritage Impact

- 5.2.1 Having identified the heritage assets which will be impacted upon by the proposals, the submitted Environmental Statement and supporting technical appendices set out the details of the designated heritage assets which will be affected by the operational phase of the proposed onshore infrastructure for both EA1N and EA2 schemes, separately and together, and assess the impact which the proposed schemes would have upon their significance. As was discussed in Section 4, this detailed assessment does not consider the likely impacts upon the settings of these heritage assets which will be caused during the construction and decommissioning phases of the scheme, and this is a fundamental failing on the part of the applicant to address the likely heritage impact of the entire scheme throughout its lifespan.
- 5.2.2 In assessing the magnitude of the impact upon the heritage significance of the affected heritage assets, the applicant has adopted a matrix-based approach. For reference, the matrix is reproduced here as Figure 2. On one

axis, the Heritage Importance of a heritage assets is graded on a Negligible/Low/Medium/High scale. On the other axis, the Magnitude of the adverse or beneficial impact upon the heritage asset is graded on Negligible/Low/Medium/High scales. The resulting Significance of Effect is then able to be calculated on a Negligible/Minor/Moderate/Major scale. In calculating these scores, the applicant has considered Grade II-listed buildings to be of medium heritage importance, while Grade II* buildings are considered to be of high importance. This reflects the division between the consideration of Grade I and II* buildings and Grade II buildings suggested by the NPPF, although the exclusion of a 'Very High' category from the Heritage Importance scale has resulted in these being split between 'High' and 'Medium', rather than 'Very High' and 'High', as might otherwise be the case. The results of each assessment are discussed on a case-by-case basis below.

		Adverse Magnitude				Beneficial Magnitude			
		High	Medium	Low	Negligible	Negligible	Low	Medium	High
Heritage Importance	High	Major	Major	Moderate	Minor	Minor	Moderate	Major	Major
	Medium	Major	Moderate	Minor	Minor	Minor	Minor	Moderate	Major
	Low	Moderate	Minor	Minor	Negligible	Negligible	Minor	Minor	Moderate
	Negligible	Minor	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible	Minor

Figure 2. The applicant's Significance of Effect Matrix (ES Table 24.9).

5.2.3 With specific regard to the group of seven Grade II*- and Grade-II listed buildings adjacent to the proposed Friston substations, paragraph 239 of both Environmental Statements summarises the potential impact of the operational phase thus:

For the seven assets in the vicinity of the onshore substation at Friston it is the presence of the onshore substation and National Grid substation, rather than the proposed permanent overhead

realignment works that would lead to adverse impact on significance. These impacts are caused primarily by the extent and visual prominence of the onshore substation and National Grid substation which would change the landscape character in the settings of heritage assets currently experienced and appreciated in a rural agricultural setting.

- 5.2.3 I do not agree with this conclusion, for reasons which are explored more fully below. The proposed realignment works will result in the construction of an additional pylon situated closer to heritage assets than the current pylons, changing and having a negative impact upon their settings. The impacts of the proposed development schemes are also considered to be more than simply visual, and by focussing on the extent and visual appearance of the proposed substations, attention is drawn away from the impacts which will be caused by the associated infrastructure, including a 1.7km new link road which will traverse the setting of several heritage assets across what are currently agricultural fields.
- 5.2.4 The Environmental Statements then summarise the conclusions of the submitted assessment of the heritage impact of the onshore infrastructure and refers the reader to their content (ES Appendix 24.7). Again, this assessment only focusses on the operational phase of the project, and not the commissioning or decommissioning phases. The assessment concludes that the proposed onshore infrastructure will change the appearance and character of the settings of the identified heritage assets, as well as changing specific views of and between them. Despite this acknowledgment of a change of landscape character, the submitted report concludes that visual change is the only aspect of the heritage assets' settings which would be affected by the proposed developments. This conclusion is fundamentally at odds with the established practice for the identification and assessment of setting prescribed by the National Planning Policy Guidance and by Historic England in GPA3. As has been seen, the application of such an overly-narrow focus has also been tested at the Court of Appeal and found to be wanting.

5.2.5 The applicant's assessment of the predicted visual changes in the setting of the heritage assets is illustrated by photomontages from thirteen viewpoints, four of which form part of the submitted Landscape and Visual Impact Assessment (ES Chapter 29) and nine produced specifically for heritage purposes. In addition to assessing the various combinations of the EA1N and EA2 schemes, the submitted assessments have also considered the potential heritage impacts before and after the application of the proposed mitigation. An *Outline Landscape Mitigation Plan* is set out in the submitted documents (Document 8.7) and this, in part, seeks to mitigate the adverse impacts caused by the operational elements of the onshore infrastructure. With regard to heritage impacts, this comprises two main approaches: the planting of new areas of woodland at Friston to screen the substations from view, and the reinstatement and reinforcement of historic field boundaries in the surrounding landscape in order to provide layered screening.

5.2.6 The efficacy of the proposed mitigation is considered on a case-by-case basis below. However, Historic England's GPA3 (para. 40) makes the following general observations on the use of screening, which should be heeded here:

Where attributes of a development affecting setting may cause some harm to significance and cannot be adjusted, screening may have a part to play in reducing harm. As screening can only mitigate negative impacts, rather than removing impacts or providing enhancement, it ought never to be regarded as a substitute for well-designed developments within the setting of heritage assets. Screening may have as intrusive an effect on the setting as the development it seeks to mitigate, so where it is necessary, it too merits careful design. This should take account of local landscape character and seasonal and diurnal effects, such as changes to foliage and lighting. The permanence or longevity of screening in relation to the effect on the

setting also requires consideration. Ephemeral features, such as hoardings, may be removed or changed during the duration of the development, as may woodland or hedgerows, unless they enjoy statutory protection. Management measures secured by legal agreements may be helpful in securing the long-term effect of screening.

- 5.2.7 The submitted photomontages are highly selective and do not give a representative impression of either the character of the affected heritage assets and their settings, or of the likely impacts of the proposed developments. By only selecting years 1 and 15 of the proposed mitigation, these images also give a too infrequent and overly optimistic impression of the predicted growth of the mitigation planting. Although the validity of the depicted predicted growth lies outside the scope of this report, SASES have commissioned a parallel critique of the submitted Landscape and Visual Impact Assessment and this should be read in conjunction with the discussion presented below.
- 5.2.8 The submitted assessment of the heritage impact of the onshore infrastructure (ES Appendix 24.7) also states that any changes in noise level during the operational phase are not considered to be sufficiently high as to warrant further consideration. This assessment focusses solely on the operational phase and not the construction or decommissioning phases, and therefore gives a false overall impression of any likely noise levels. Completely disregarding the detrimental impact which the introduction of any industrial noise into what is currently a tranquil rural landscape will have on the setting of the heritage assets which lie within it, even if that noise is considered to lie within 'acceptable' levels, is a significant omission on the part of the applicant and does not allow an informed decision to be made. Again, the detailed assessment of likely noise levels lies outside the scope of this report, but SASES have commissioned an independent assessment of the submitted noise assessment, and this, too, should be read in conjunction with the discussion presented below.

5.3 Church of St Mary, Friston: Grade II*

- 5.3.1 The parish church of St Mary (National Heritage List Entry No. 1287864) stands on a prominent rise at the northern edge of Friston, some 400m to the south of the southernmost extent of the EA1N substation site. The church comprises a nave and chancel with a south porch and square western tower. The earliest visible fabric is 11th century, including a blocked doorway in the north wall of the nave, but most of the medieval fabric is 14th and 15th century. The medieval fabric was extensively restored in the late 19th and early 20th centuries, including the complete rebuilding of the western tower.
- 5.3.2 The submitted report identifies that the significance of this heritage asset primarily lies in the medieval fabric of the church, which has considerable architectural, archaeological, artistic and historic interest. As a place of worship, the church has stood at the heart of the Friston community for a thousand years, and as the venue for baptisms, weddings and funerals is intrinsically linked with the social history of the village. This is exemplified by the presence of the Friston War Memorial within the churchyard, which is listed in its own right and is discussed separately below.
- 5.3.3 The submitted report identifies that the setting of the church contributes to its significance and that this setting can be appreciated at three different scales. First, there is the immediate setting of the churchyard, with its war memorial; second, there is the relationship with the settlement of Friston to the south, reinforcing the historic interest of the church as a component of this historic settlement. Thirdly, the report states, the church can be experienced as a prominent feature in views from the surrounding landscape. These views allow the church to be appreciated in its historic role as the spiritual and physical focal point of its parish, adding further to historic interest in the asset. This assessment does not capture the historical relationship between the church and the group of medieval farmsteads which lie to its north, to which it is connected by a footpath which extends northwards from the church, following the line of the parish boundary. This

boundary is also the Anglo-Saxon hundredal boundary and, as such, is a feature of some antiquity in its own right.

- 5.3.4 The proposed schemes would see the construction of the EA1N and EA2 substations 400m to the north of the church, with the National Grid substation and supporting infrastructure constructed beyond it to the north and west. Also significant, but not considered in the impact assessment, is the fact that that boundary of the onshore development area is shown extending southwards to the northern boundary of the churchyard itself and incorporates much of the lane to the north of the church. Although full details have not been provided by the applicant, this will bring construction activity into the immediate proximity of the listed building, exposing it to the physical and visual impacts of construction for a period of potentially five years or more. Similarly, the impacts which will be caused to the setting of the listed building during the decommissioning phase of the project have not been assessed.
- 5.3.5 The likely visual impact of the proposed development schemes on the Grade II*-listed church and its setting is illustrated in six photomontages. Photomontage CH VP8 is taken from the position of the war memorial at the eastern end of the church and shows the view looking north towards the substation site. The foreground of this viewpoint features a small group of four trees, which are among very few which stand in the churchyard, and this photomontage gives a very unrepresentative impression of the view to the north which can be obtained from much of the rest of the churchyard. Even despite this choice of viewpoint, it is apparent from these images that the EA1N and EA2 substations would be very visible from the churchyard, although some of these views would be filtered by the existing vegetation.
- 5.3.6 Longer views from within Friston looking towards the church are illustrated in LVIA VP6, which shows the view from the green in Friston, with the tower of the church visible in the foreground and the upper extent of the substations visible beyond. Photomontage CH VP1 illustrates the view northwards towards the church from footpath which lies to its south, which

shows the church highlighted against the sky and highest parts of the EA1N and EA2 substations visible through the trees beyond. The latter image is cited as an example of how the substations would appear to be subservient landscape features to the church, but this statement is misleading because the viewpoint selected is considerably lower than the church and is looking up towards it. In actuality, the substation buildings will be considerably taller than the church tower and much larger than the church itself.

5.3.7 Similar long-distance views are illustrated by LVIA VP9, taken from the road approaching the village from the south, and in CH VP2, which illustrates the view towards the church from a path heading west out of the village towards Friston Hall. In both images, the upper parts of the EA1N and EA2 substations would be visible in the background of views of the village and church. A final photomontage, CH VP4, is taken from adjacent to Little Moor Farm to the north (discussed below), but the church tower is clearly visible on the skyline from a distance of some 1.2km. These images indicate that all such views of the church from the north would be entirely blocked by the construction of the proposed substations and associated infrastructure and that the historical connection between the church and farmsteads to the north will be severed.

5.3.8 What all of the submitted photomontages fail to capture are the uninterrupted views northwards from the churchyard, which look out over the proposed development site. There is, for example, no reversed view of CH VP4, which would indicate more clearly the visibility of the church across the full extent of the development site. Neither are any of the images taken from anything other than ground level – extensive views out across the development site which can be obtained from the top of the church tower (Figure 3). These views give a clear impression of quite how visible the church is from the north and the extent to which its northern setting will be compromised by the proposed development. Finally, there are no views provided from inside the church – the windows in the north wall of the church are low, large and glazed with clear glass, so that clear views out

from the nave across the development site are afforded by those visiting and worshipping in the church, too (Figure 4).

- 5.3.9 The submitted heritage impact assessment concludes that the proposed development would result in 'at least some change' to the setting of the church, although it goes on to state that there would be no material impact upon the appreciation of the church from the churchyard, that there would be no material impact on the setting of the church in the longer views from the south, and that only the single public view from the footpath to the north would be lost. Using the matrix described above, the report concludes that the overall impact on the setting of the church would amount to an adverse impact of low magnitude and because the Grade II* building is considered to be of high heritage importance the result would be an adverse effect of moderate significance.
- 5.3.10 In my professional opinion this conclusion significantly downplays the impact which the proposed schemes would have upon the setting of the church. The full extent of the substation development would be highly visible from within the church and churchyard, and the change of character from a rural agricultural landscape to a industrialised landscape would have a significant detrimental effect upon the setting within which the church is experienced. While the applicant argues that the church will remain the dominant building, it will be dwarfed by the scale, mass and extent of the proposed new development to the north.
- 5.3.11 The identification of the loss of the single long view from the north obtainable from the public footpath also fails to take into account the fact that land does not need to be publicly accessible in order to be considered a part of the setting of the church, so that all of the land to the north of the church from which it is visible and with which it has historical and social associations should be considered to be a part of its setting. This approach also highlights that the submitted assessment primarily focusses on the significance of views towards the church, rather than views obtained from it.



Figure 3. A panoramic view across the proposed development area looking north from the top of Friston church tower.



Figure 4. The view looking north across the proposed development area from within the nave of Friston parish church.

5.3.11 By taking an overtly visual approach to the assessment, the applicant also fails to address the other elements of the church's setting which might be impacted upon by the proposed development. One of the key characteristics of the church is the peace and tranquillity of its rural setting, enabling those who visit and worship in the church to appreciate the building in relative silence. This experience will be considerably altered by the presence of the proposed substation complex, which will be visually intrusive, but which also has the potential to be aurally intrusive, too. By failing to consider and assess these potential impacts upon the church, the

applicant has failed to address the policy requirements set out in paragraph 5.8.10 of NPS EN-1 and has reached an erroneously low conclusion on the likely impact of the scheme upon the setting of the church.

5.3.12 Also missing entirely from the assessment of the potential impact on the church and its setting is an acknowledgement that the construction area for the schemes is due to include much of the lane to the north of the church and appears to incorporate the roadside verges which form the northern boundary of the churchyard. If this is the case, then the construction phase has the potential to cause significant damage to the immediate setting of a highly graded heritage asset, and yet the submitted report repeatedly states that the construction phase will have no impact on any designated heritage assets. Without further details being submitted on this matter, and a proper assessment undertaken of the potential impacts of the construction phase on the immediate environs of the church it is not possible for an informed decision to be made regarding the potential heritage impact of the proposed scheme.

5.3.13 With regard to the effectiveness of the proposed mitigation, the applicant indicates that, while the proposed additional planting will provide a small degree of reduction to this harm, it is not sufficient to reduce the identified impact in any way. Put simply, by the applicant's own admission, the proposed mitigation will not reduce the heritage impact on the church.

5.3.14 I conclude that the applicant has significantly underestimated the impact which the proposed schemes would have upon the setting of the church. My own assessment would be that the impact upon the setting of the church would be of high magnitude, resulting instead in an adverse effect of major significance. In planning terms, the applicant accepts that the identified harm to St Mary's church represents 'less than substantial harm' caused by changes to the setting of the heritage asset, although they do not express an opinion as to the degree of harm represented. This harm would be at the very upper end of the 'less than substantial' scale and, by the applicant's admission, is not able to be mitigated.

5.4 Friston War Memorial: Grade II

- 5.4.1 Friston war memorial (National Heritage List Entry No. 1435814) is situated in the churchyard, at the eastern end of the church. The memorial was constructed in 1920 and comprises a Portland stone cross, bearing a stone-carved 'Sword of Sacrifice', rising from an octagonal plinth on a four-stepped base.
- 5.4.2 The submitted assessment identifies the immediate setting of the memorial as comprising the churchyard. The heritage significance of the memorial lies in its historical interest as a witness to the tragic impact of world events on the local community and the sacrifice it made during 20th-century conflicts, design value and group value with the church of St Mary. As such, it is an important link with the social history of the settlement.
- 5.4.3 As with St Mary's church, the proposed schemes would see the construction of the EA1N and EA2 substations 400m to the north of the memorial, with the National Grid substation constructed beyond them to the north. Also significant, but not considered in the impact assessment, is the fact that that boundary of the onshore development area is shown extending southwards to the northern boundary of the churchyard itself and incorporates much of the lane to the north of the church. Although full details have not been provided by the applicant, this will have the effect of bringing construction activity into the immediate proximity of the war memorial, which will consequently be exposed to the physical and visual impacts of construction for a period of several years. Similarly, the impacts which will be caused to the setting of the listed building during the decommissioning phase of the project have not been assessed.
- 5.4.4 The likely impacts of the proposed development schemes on the Grade II-listed war memorial and its setting is illustrated in photomontage CH VP8, which is taken from a position north of the war memorial and shows the view looking north towards the development site. It is apparent that the EA1N and EA2 substations would be very visible from the churchyard, although some of these views would be filtered by existing vegetation.

- 5.4.5 As was discussed above, the foreground of this viewpoint features a small group of four trees, which are among very few which stand in the churchyard, and the image therefore gives an unrepresentative impression of the view to the north which can be obtained from the memorial.
- 5.4.6 The submitted report concludes that the overall impact on the setting of the war memorial would amount to an adverse impact of negligible magnitude and as the Grade II listed building is considered to be of medium heritage importance the result would be an adverse effect of minor significance.
- 5.4.7 In reaching this conclusion, the report cites the fact that only views away from the memorial would be affected, but what the report does not mention and the photomontage does not show is that the inscribed front face of the war memorial is orientated to the south-west, so that anyone facing the front of the memorial will be facing towards the proposed development site (Figure 5). As a consequence, elements of the EA1N and EA2 substations will visually intrude into the backdrop of the memorial and have a significant impact upon the way in which the war memorial is experienced.
- 5.4.8 Again, the focus on a visual assessment of impact overlooks other sensory impacts which the proposed development would have upon those honouring the memorial. A key characteristic of the setting of the memorial is the relatively tranquillity and solemnity of the churchyard, and this has the potential to be greatly impacted upon by the proposed schemes.
- 5.4.9 I conclude that the impact upon the setting of the memorial would be of medium magnitude, resulting in an adverse effect of moderate significance, rather than minor. In planning terms, the identified harm to the war memorial should be considered to represent 'less than substantial harm' caused by changes to the setting of the heritage asset, and this harm is at the lower end of the scale.



Figure 5. Friston war memorial looking north towards the proposed development area. Note that the front of the memorial faces south-west.

5.4.10 As with the church itself, the applicant indicates that, while the landscape mitigation will provide a small degree of reduction to this harm, it does not affect the initial assessment. The proposed mitigation is therefore ineffective with regard to harm to the war memorial.

5.5 Woodside Farmhouse: Grade II

5.5.1 Woodside Farmhouse (National Heritage List Entry No. 1215744) stands 350m to the south of the south-western corner of the proposed EA1N substation site. It is a 17th-century, two-storey, timber-framed and plastered farmhouse, with an 18th-century southern extension.

5.5.2 The submitted assessment identifies that the heritage significance of the building lies primarily in the architectural and archaeological interest of its fabric, but also concludes that, as a former farmhouse, the agricultural land within which the building is situated contributes positively to its significance through its functional and historical links, which in turn adds additional

historical interest to the property. The farmhouse is situated on a lane and is visible from across the fields to its east, in which it can be read as a farmhouse in an agricultural landscape.

- 5.5.3 The proposed scheme would see the construction of the EA1N substation closest to the building, with the EA2 substation beyond it and the National Grid substation and associated infrastructure to their north. Of particular significance is the fact that the construction area boundary encloses the block within which Woodside Farmhouse is situated, and takes in the southern end of the lane on which the building is situated. Although details have not been provided by the applicant, this will have the effect of bringing construction activity into the immediate proximity of the listed building, which will consequently be exposed to the physical and visual impacts of construction for a period of several years. Similarly, the impacts which will be caused to the setting of the listed building during the decommissioning phase of the project have not been assessed.
- 5.5.4 The potential impact of the proposed development on the setting of Woodside Farmhouse is illustrated by a single photomontage, CH VP5. This is taken from the footpath to the west of the farmhouse, looking east, and as such contains much of the western facade of the building, with views of the outbuildings behind it and to the north, but doesn't give a full impression of the views across and experience of the agricultural land to the east which are to be obtained from the eastern side of the building and from within the building itself. Even with this limited view, though, the images demonstrate that any development of the EA1N substation site will be particularly intrusive, with the character of the landscape being changed from a rural agricultural character to a mixture of industrial infrastructure and rural agriculture.
- 5.5.5 The submitted report concludes that the presence of the onshore substations and National Grid substation would represent a significant change in the character of the agricultural land which materially contributes to the setting, and therefore the significance, of the Grade II-listed

Woodside Farmhouse. Therefore, the impact upon the heritage asset would be of medium magnitude for any scheme involving the development of the EA1N substation site, reducing to an adverse impact of low magnitude for just the EA2 sub-station. Because the Grade II building is considered to be of medium heritage importance the result would be an adverse effect of moderate significance for any scheme involving the development of the EA1N substation site, reducing to an adverse impact of low magnitude for just the EA2 sub-station.

5.5.6 In my professional opinion, this is an accurate assessment of the likely impact of the schemes if the EA1N site were to be developed, but I do not agree that the harm is reduced if only the EA2 site is developed. To draw a division between the two projects in this way overlooks the fact that the National Grid substation and associated infrastructure will be constructed in both cases, and given the relative proximity of these and their associated link roads to Woodside Farmhouse, I conclude that the development of either or both of the EA1N and EA2 substation sites would result in an adverse effect of moderate significance. In planning terms, the identified harm to Woodside Farmhouse represents 'less than substantial harm' caused by changes to the setting of the heritage asset, and this harm is towards the upper end of the scale.

5.5.7 Having identified this level of harm, the applicant suggests that the proposed additional planting between Woodside Farmhouse and the proposed substations sites would be sufficient to reduce these impacts to an adverse impact of low magnitude for the EA1N sub-station and negligible magnitude for just EA2 sub-station. I am not of the opinion that the submitted information, and particularly the images presented as CH VP5 support this assertion, and consider that the additional planting will make very little difference to the overall impact of the proposed development on the setting of Woodside Farmhouse.

5.6 Friston House: Grade II

- 5.6.1 Friston House (National Heritage List Entry No. 1216066) stands 450m to the west of the proposed EA1N substation site. It is a substantial two-storey brick house belonging to the first half of the 19th century, with a later 19th-century extension to the east. Friston House stands in the north-western part of a large expanse of landscaped grounds, measuring approximately 400m north to south and 300m east to west. The front of the house faces westwards onto Saxmundham Road, but it is flanked to the north by a courtyard and by a walled kitchen garden to the north-east. To the south of the house are lawns and the rest of the grounds are lightly wooded.
- 5.6.2 Historical mapping indicates that this arrangement represents the original configuration of the house and grounds, and as such the grounds form an important part of the setting of the house and contribute towards its significance. In the submitted assessment report, the applicant argues that the setting of the Friston House is restricted solely to the area of the landscaped grounds and that the wider landscape does not form part of its setting or contribute towards its significance. However, to simply interpret the landscaped grounds as a private space, with no reference to the wider landscape overlooks the crucial element of the design which is the juxtaposition between the formal designed elements of the grounds and the irregular agricultural landscape beyond. The landscape beyond the grounds, including the development site, should therefore be considered to make a contribution towards the setting and therefore the significance of Friston House.
- 5.6.3 Having emphasised the enclosed and private nature of Friston House, the submitted assessment report acknowledges that eastward views across the proposed development site can be obtained from within the grounds and from some of the rear-facing windows of the property.
- 5.6.4 The proposed scheme will see the construction of the EA1N substation and the National Grid substation 200m from the eastern boundary of the grounds and 400m from Friston House. The access road is also intended to

run close to the boundary of Friston House, although the applicant does not consider this at all. The construction area boundary partially follows the eastern boundary of the grounds, which will bring the construction works into the immediate proximity of the grounds, but some 200m from Friston House.

- 5.6.5 Two photomontages are provided to illustrate the likely visual effects of the proposed developments on views eastwards from Friston House, although both of these are taken from viewpoints which do not afford the most open views and neither is from the house itself, which has large rear windows overlooking the proposed development site. As such, the submitted images provide a false impression of the setting of Friston House. Photomontage CH VP6 is taken from a position on the lawns to the south of Friston House, which are demonstrably lower than the house itself, the footings of which are above eye level in the establishing image 'a', giving a misrepresentative view of the degree to which Friston House overlooks the development site. Even so, these images demonstrate that elements of the proposed onshore infrastructure will be visible from within the grounds, and will jar with the naturalistic features of the foreground.
- 5.6.6 A second photomontage CH VP7 is taken from land to the rear of Friston House and gives a more representative impression of the views across the development site. This image calls into question the applicant's argument that the grounds were intended to be visually separated from the surrounding landscape. The photomontage indicate that the substations and associated infrastructure would be very visible between the trees from within this part of the grounds, as they would from the house itself, and would intrude upon the setting of the heritage asset.
- 5.6.7 Both photomontages indicate that the growth of the planned mitigation planting during the first 15 years of operation would obscure elements of the proposed development, but not in its entirety, meaning that harm would still be being caused to the setting of the heritage asset even after 15 years of mitigation.

- 5.6.8 The submitted report concludes that the presence of the onshore substations, National Grid substation and associated infrastructure would have a very limited effect upon the setting of Friston House and that this would not diminish the significance of the house in any way. The report concludes that the impact upon the heritage asset would be of negligible magnitude and because the Grade II building is considered to be of medium heritage importance the result would be an adverse effect of minor significance.
- 5.6.9 In my professional opinion, this assessment underestimates the importance of the juxtaposition between the formal grounds and the surrounding agricultural landscape in establishing the setting of Friston House and also underestimates the impact which the introduction of views of industrial infrastructure into an otherwise wooded landscape will have upon the setting of the house.
- 5.6.10 I consider that the impact upon Friston House would be of low magnitude, rather than negligible, although this still results in an adverse effect of minor significance in the applicant's matrix. In planning terms, the identified harm caused by changes to the setting of Friston House constitutes 'less than substantial harm' and this harm is at the lower end of the scale.
- 5.6.11 The applicant concludes that, while the proposed landscape mitigation will result in a small degree of reduction to this harm, it will not be sufficiently effective for the initial result of the assessment to be altered in any way. Put simply, the applicant concludes that their own proposed mitigation scheme will do nothing to mitigate the adverse impact which the proposed developments will have on the setting of Friston House.

5.7 Little Moor Farm: Grade II

- 5.7.1 Little Moor Farm (National Heritage List Entry No. 1215743) stands approximately 300m to the north of the proposed substation sites and is a 17th-century, two-storey, timber-framed building with a brick-cased ground floor. The submitted assessment identifies that the heritage significance of

the building lies primarily in the architectural and archaeological interest of its fabric, but also concludes that, as a former farmhouse, the agricultural land within which the building is situated contributes positively to its significance through its functional and historical links, which in turn adds additional historical interest to the property.

- 5.7.2 The submitted assessment also identifies historical connections between the property and the moated site to its west (Suffolk HER KND 011), with the Grade II-listed High House Farm further to the west (NHLE 1216049) and a small hedged enclosure to the north of Little Moor Farm (Suffolk HER KND 015). The report identifies all four features as representing farmsteads which formed an early hamlet on the edge of Friston Moor, an arrangement which survived into the late 19th century. These connections also add to the historical and archaeological interest of the property. Although the surrounding landscape has evolved, it retains its agricultural character and the more modern elements of the landscape do not materially detract from the contribution which setting makes to the significance of the farmhouse.
- 5.7.3 The proposed schemes will see the construction of new pylons on land immediately to the south of Little Moor Farm, together with three cable sealing end compounds, with the National Grid substation located 300m to the south of the building. Beyond this, the substations will be constructed. Also significant, but not considered in the impact assessment, is the fact that that boundary of the onshore development area is contiguous with the property boundary of Little Moor Farm, and surrounds it on three sides. Although details have not been provided by the applicant, this will have the effect of bringing construction activity into the immediate proximity of the listed building, which will consequently be exposed to the physical and visual impacts of construction for a potentially five-year period. Similarly, the impacts which will be caused to the setting of the listed building during the decommissioning phase of the project have not been assessed.
- 5.7.4 The submitted photomontages CH VP3 and CH VP4 are cited as evidence of the resulting visual appearance of the proposed schemes in relation to

Little Moor Farm during its operational phase. The position from which CH VP3 is taken lies on a public right of way 300m to the north-west of Little Moor Farm and as such does not actually provide any visual indication of any potential impact which may be had on Little Moor Farm itself. It does, however, indicate that even at a distance of 600m, all three combinations of the proposed substations and associated infrastructure are starkly visible against the skyline and will form a significant backdrop to the listed building.

- 5.7.5 A clearer impression of the impact which the proposed schemes will have upon Little Moor Farm is afforded by photomontage CH VP4, which is taken from the public footpath immediately to the west of the building. These views convey the full extent and proximity of the substations, with the EA2 substation being particularly prominent. Perhaps most significantly, the visual representations of the site in the 15th year of its operational phase, which is intended to convey the effectiveness of the proposed landscape mitigation, shows little or no discernible change to the view. This indicates that the proposed mitigation would do nothing to affect the impact upon the setting of the Little Moor Farm.
- 5.7.6 The submitted report concludes that the presence of the onshore substations and National Grid substation would represent a significant change in the character of the agricultural land which materially contributes to the setting, and therefore the significance, of the Grade II-listed Little Moor Farm. Therefore, the impact upon the heritage asset would be of medium magnitude and because the Grade II building is considered to be of medium heritage importance the result would be an adverse effect of moderate significance. In planning terms, this equates to 'less than substantial harm', although no indication is given by the applicant as to where they consider this impact will lie on the 'less than substantial' scale. In my professional opinion, the applicant's assessment of the impact of the operational phase is correct, with the harm lying towards the upper end of the 'less than substantial' scale.

5.7.7 The applicant concludes that the proposed landscape mitigation will result in a small degree of reduction to this harm, though it will not be sufficiently effective to alter the initial assessment in any way. The proposed mitigation scheme will do nothing to mitigate the adverse impact which the developments will have on the setting of Little Moor Farm.

5.8 High House Farm: Grade II

5.8.1 High House Farm (National Heritage List Entry No. 1216049) stands some 350m to the north of the proposed substation sites and 250m west of Little Moor Farm. The building comprises a 17th-century, two-storey, timber-framed and plastered farmhouse with an L-shaped plan with later brick casing.

5.8.2 As with Little Moor Farm, the submitted assessment identifies that the heritage significance of the building lies primarily in the architectural and archaeological interest of its fabric, but also concludes that, as a former farmhouse, the agricultural land within which the building is situated contributes positively to its significance through its functional and historical links, which in turn adds additional historical interest to the property. As discussed above, High House Farm shares historical connections with the group of related farmsteads on the edge of Friston Moor, which also includes Little Moor Farm, as well as with the church to the south, and these connections add to the historical and archaeological interest of the property.

5.8.3 High House Farm is a relatively open site and the complex of buildings of which the listed farmhouse forms a part is highly visible from numerous locations in the surrounding landscape, with particularly long views from the south and south-east, across the proposed development site towards the church (Figure 6). These views will be blocked as a result of the proposed development and the historical connection between the farmsteads and the church and settlement to the south will be severed.



Figure 6. A long view looking southwards from the garden of High House Farm across the proposed development area. Note that the church tower and nave are clearly visible from a distance of 1.2km.

5.8.4 The proposed schemes will see the construction of new pylons on land immediately to the south of High House Farm, together with three cable sealing end compounds, with the National Grid substation located 350m to the south of the building. Beyond this, the substations will be constructed. Also significant is the fact that the construction area boundary line follows the southern property boundary of High House Farm. As is the case for Little Moor Farm, this will bring construction activity into the immediate proximity of the listed building, which will consequently be exposed to the physical and visual impacts of construction for a period of several years. Neither the impacts which will be caused to the setting of the listed building during the construction or decommissioning phases of the project have been assessed.

5.8.5 High House Farm is featured in photomontage CH VP3, together with Little Moor Farm, which is taken from a public right of way 100m to the north of High House Farm and as such does not actually provide a visual indication

of any potential impact which may be had on High House Farm itself. It does, however, indicate that even at a distance of 400m, all three combinations of the proposed substations and associated infrastructure are starkly visible against the skyline and will form a significant backdrop to the listed building.

- 5.8.6 A better impression of the likely impact on the setting of High House Farm is given by photomontage LVIA VP5, which is to be found in Chapter 29 of the Environmental Statement – *Landscape and Visual Impact Assessment* – and not the heritage chapter. LVIA VP5 is taken from a point some 50m to the west of High House Farm, so again does not offer a completely accurate rendering of the likely appearance of the substation site. The impression given by this image is misleading, because the unhindered viewpoint presented in image 'a' of the sequence is not the same as the base image used for the later views in the series. However, the LVIA VP5 images are sufficient to give a strong impression of the extent of the development and the change of character which would be brought about by its construction.
- 5.8.7 A second feature of the LVIA VP5 images is the presence in the foreground of a planted hedge, which is shown in relative maturity in the year 1 image and even more so in the year 15 image. Given the problems with the framing of this image, it is not clear exactly where this hedge is intended to be planted, but it will do nothing to affect the long views across the development area which are currently afforded from the garden and ground- and first-floor windows of High House Farm (Figure 6). The applicant also accepts that in this instance, the proposed mitigation will do nothing to affect the impact of the scheme on High House Farm.
- 5.8.8 The submitted report concludes that the presence of the onshore substations, National Grid substation and associated infrastructure will represent a significant change in the character of the agricultural land which materially contributes to the setting, and therefore the significance, of the Grade II-listed High House Farm. However, the report concludes that in this instance the impact upon the heritage asset would only be of low magnitude and because the Grade II building is considered to be of medium

heritage importance the result would be an adverse effect of minor significance.

5.8.9 In my professional opinion, this assessment substantially undervalues the contribution which setting makes to the significance of High House Farm, which should be considered to be comparable to that for Little Moor Farm, with which it shares many characteristics. In that instance, the applicant concluded that the impact would be of medium magnitude and the arguments which they present for this disparity are not compelling. I consider the impact upon the heritage asset would be of medium magnitude in this instance, too, resulting in an adverse effect of moderate significance, rather than minor. The applicant states that the identified harm to High House Farm caused by changes to the setting is 'less than substantial', although they offer no indication where this might sit on a scale of harm. I place this harm towards the upper end of the scale.

5.8.10 As with Little Moor Farm, the applicant concludes that, while the proposed landscape mitigation will result in a small degree of reduction to this harm, it is not sufficiently effective for the initial result of the assessment to be altered in any way. The applicant concludes that their proposed mitigation scheme will do nothing to mitigate the adverse impact which the proposed developments will have on the setting of High House Farm.

5.9 [Friston Post Mill: Grade II*](#)

5.9.1 Friston post mill (National Heritage List Entry No. 1215741) is located on the west of the village, some 900m to the south-west of the proposed substation site. The mill dates from 1812 with 19th-century modifications, and its significance is primarily derived from the architectural and historical interest of the building and its surviving mechanisms, which make it one of the best-surviving examples of a post mill in the world. The mill is currently on the Heritage at Risk register and is opened to the public as part of the Heritage Open Days, so that visitors can climb the mill and look out over the surrounding landscape, including the substation site.

- 5.9.2 The submitted assessment identifies two main elements to the setting of the mill. The first being the immediate environs of the mill and associated miller's house to the north. The second element is the longer views of the mill which are afforded, particularly from the south and the west, in which the mill stands taller than the surrounding buildings.
- 5.9.3 The proposed scheme would see the construction of the EA1N substation 900m to the north of the mill, with the EA2 substation situated beyond it and the National Grid substation to their north. The site of the mill also lies well outside the boundary of the construction area, from which it is separated by the built form of Friston.
- 5.9.4 The potential impact of the proposed development on the setting of the mill is illustrated by a single photomontage, CH VPg, which is taken from a location some 450m to the south-west of the mill. As such, this image does not provide an appreciation of the views which are to be obtained from the mill itself or its immediate environs, and does not capture the relationship between the mill and the development area. These images indicate that the upper elements of both the EA1N and EA2 substations are likely to be visible as part of the built skyline of Friston beyond the mill in view from the south, but no assessment is offered of any visual effect on views from the mill itself.
- 5.9.5 The submitted report concludes that the presence of the onshore substations and National Grid substation would have a very limited effect upon the setting of Friston mill. The report concludes that the impact upon the mill would be of negligible magnitude and because the Grade II* building is considered to be of high heritage importance the result would be an adverse effect of minor significance. The applicant indicates that, while the landscape mitigation will provide a small degree of reduction to this harm, it does not affect the initial conclusion. I would agree with this assessment. In planning terms, the identified harm to Friston Mill represents 'less than substantial harm' caused by changes to the setting of the heritage asset, and this harm is at the lower end of the scale.

6 Conclusion

- 6.1 In presenting a critique of the heritage aspects of the EA1N and EA2 schemes, it needs to be acknowledged that the onshore elements of both schemes are very similar. Both schemes share an onshore cable route and result in the construction to the north of Friston of a National Grid substation and one or two onshore substations, depending upon which schemes are successful. As a consequence, much of the same heritage material and supporting reports are reproduced as part of both applications.
- 6.2 Chapter 24 of both Environmental Statements sets out the baseline conditions for the historic environment within and surrounding the onshore development area. To date, the onshore cable route and substation sites has been subject to archaeological desk-based assessment and geophysical survey, which have informed the development of the cable route and the submitted archaeological mitigation strategy. A detailed assessment of the results of the geophysical survey and the identification of a series of archaeological areas requiring further fieldwork are set out in the Environmental Statement. However, throughout all of these documents there is a presumption that these fieldwork elements will be carried out post-consent, but before the commencement of any development work, and not ahead of the DCO decision being made.
- 6.3 The fact that such fieldwork has not been undertaken by the applicant to date represents a major shortcoming in the assessment of the known and potential archaeological resource of the onshore development area, including the landfall, cable routes and the substation sites, and as such the applications as they currently stand invite the making of a poorly informed decision with regard to the potential impact of the proposed scheme on the buried archaeological resource. By failing to provide the required level of detail, the applicant is failing in their stated duty under paragraph 5.8.10 of NPS EN-1, specifically that they 'should ensure that the extent of the impact of the proposed development on the significance of any heritage assets

affected can be adequately understood from the application and supporting documents.'

- 6.4 With regard to the identification and assessment of the potential heritage impacts of the proposed schemes, it is clearly acknowledged by the applicant that the construction, operation and decommissioning of the onshore infrastructure will have an impact upon the settings of surrounding heritage assets. There is, however, a fundamental contradiction in the submitted application documents between those sections of the Environmental Statement which clearly identify a detrimental impact on heritage assets which will be caused by the construction, operation and decommissioning of the onshore infrastructure, and the submitted assessment of heritage impacts, which focusses only on the impact of the operational phase of the schemes and does not consider the likely impacts which are due to be caused by the construction or decommissioning of both schemes' infrastructure.
- 6.5 The exclusion of the of the construction phase from the heritage impact assessment is particularly concerning, for in many cases the boundaries of the construction area lie in very close proximity to heritage assets, where they will arguably have a much greater impact than some of the later, operational phases of the proposed scheme. Concluding that there will be 'no impact' and dismissing the heritage impacts likely to be caused by the construction phase, which are set out in the preceding paragraphs of their own report, demonstrates a clear failure on the part of the applicant to adequately quantify and assess the heritage impacts across the full duration of the scheme. As a consequence, on the basis of the documents submitted to date it is not possible for an informed decision to be made about the overall heritage impact of the scheme to be made. Again, this is a failure on the part of the applicant to meet their obligations under paragraph 5.8.10 of NPS EN-1.
- 6.6 No indication of the potential impact of the decommissioning process on heritage assets is presented either. The reason given is that no decision has

been made regarding the final decommissioning policy for the onshore infrastructure, but it is stated that 'impacts no greater than those identified for the construction phase are expected for the decommissioning phase'. This lack of a detailed decommissioning process is a significant omission, and this very cursory assessment of the potential heritage impacts of the decommissioning process is not sufficient to assess the likely heritage impacts of this phase of the scheme.

6.7 Having limited their assessment of the heritage impact of the proposed schemes solely to their operational phases, the applicant identifies that the greatest heritage impact of both proposed schemes is that caused to a group of seven designated heritage assets – two listed at Grade II* and five listed at Grade II – which surround the site of the proposed substations, National Grid substation and supporting infrastructure at Friston.

6.8 Although each of the heritage assets is assessed singly, it should be stressed that these heritage assets do not exist in isolation and are all parts of a significant area of historic landscape which lies to the north of the village of Friston. The submitted report identifies historical connections between Little Moor Farm, a moated site to its west, a small enclosure to its north and nearby High House Farm. All four features represent farmsteads which formed an early hamlet on the edge of Friston Moor, an arrangement which survived into the late 19th century. These connections add to the historical and archaeological interest of the individual heritage assets and their collective identity, which is also linked to the church to the south, to which they are connected by a footpath which follows the line of the parish boundary. This boundary is also the Anglo-Saxon hundredal boundary and, as such, is a feature of some antiquity in its own right. Although the surrounding landscape has evolved over time, it retains its agricultural character and the more modern elements of the landscape do not materially detract from the contribution which setting makes to the significance of the heritage assets.

6.9 Specifically, the affected heritage assets are:

- The Church of St Mary, Friston (National Heritage List Entry No. 1287864) Grade II*
- Friston Post Mill (National Heritage List Entry No. 1215741) Grade II*
- Little Moor Farm (National Heritage List Entry No. 1215743) Grade II
- High House Farm (National Heritage List Entry No. 1216049) Grade II
- Friston House (National Heritage List Entry No. 1216066) Grade II
- Woodside Farmhouse (National Heritage List Entry No. 1215744) Grade II
- Friston War Memorial (National Heritage List Entry No. 1435814) Grade II

6.10 While I would agree with the list of affected designated heritage assets, I do not agree with the assessment of their settings or the contributions which those settings make to the significance of each of the individual buildings. In my professional opinion, the assessments set out in the submitted reports significantly underestimate the heritage impact of the proposed EA1N and EA2 schemes and undervalue the contribution made by setting to each of these designated heritage assets, resulting in much lower assessments of the adverse heritage impact on each of these individual listed buildings than might otherwise be concluded. In particular, it should be noted that the submitted illustrative viewpoints selected and photomontage visualisations are highly selective and do not include key views, such as that from the tower of Friston church or from within the building, which would enable a better visual impression of the likely impact of the scheme to be presented.

6.11 Significantly, the assessments also demonstrate that the mitigation measures put forward in the proposed Outline Landscape Mitigation Plan effectively do nothing to reduce the heritage impacts on these heritage assets in any meaningful way. In six of the seven instances where harm is identified, the applicant acknowledges that the proposed mitigation planting will be of such negligible effect that even after 15 years it will not have had sufficient effect to reduce the assessment of harm caused to any of the heritage assets. In short, by the applicant's own admission, the proposed mitigation scheme is not fit for purpose and will not reduce the heritage harm.

6.12 The table below sets out a summary of the applicant's assessment of the likely heritage impact of the operational phase of the substations at Friston, together with my own assessments of the likely impacts. Discrepancies between the applicant's assessment and my own are highlighted in red. In my assessments, I consider the potential impact of the construction of the EA1N and/or the EA2 substations and associated infrastructure to be the same. In the case of Woodside Farm, the applicant considers impact of the EA1N substation to be greater than that of the EA2 substation, but I do not agree with this assessment. As can be seen, I conclude that the submitted assessments consistently underplay the contribution made by setting to each of these designated heritage assets, resulting in lower assessments of the adverse heritage impact on each of these individual listed buildings.

Heritage Asset	Heritage Importance	Applicant's Assessment		My Assessment	
		Magnitude of Impact	Significance of Effect	Magnitude of Impact	Significance of Effect
Church of St Mary	High (II*)	Low	Moderate	High	Major
Friston War Memorial	Medium (II)	Negligible	Minor	Medium	Moderate
Little Moor Farm	Medium (II)	Medium	Moderate	Medium	Moderate
High House Farm	Medium (II)	Low	Minor	Medium	Moderate
Friston House	Medium (II)	Negligible	Minor	Low	Minor
Woodside Farmhouse (EA1N)	Medium (II)	Medium	Moderate	Medium	Moderate
Woodside Farmhouse (EA2)	Medium (II)	Low	Minor	Medium	Moderate
Friston Post Mill	High (II*)	Negligible	Minor	Negligible	Minor

6.13 As is acknowledged by the applicant, in every case, both with and without mitigation measures in place, the adverse impacts identified constitute 'less than substantial harm' in planning terms. As is set out in Section 2, under existing planning law and policy it is required that these adverse impacts be

weighed against the wider benefits of the application and that the greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval (NPS EN-1 para. 5.8.18). Any decision taken will also require that the desirability of preserving the settings of listed buildings should be given 'considerable importance and weight' when the decision-maker carries out the balancing exercise (Barnwell Manor Wind Energy Ltd v East Northants DC, English Heritage, National Trust and SSCLG [2014] EWCA Civ 137, Para. 24).

- 6.14 The submitted DCO application documents focus on the immediate impacts of the proposed EA1N and EA2 schemes, but what has not been considered in any meaningful detail by the applicant is the cumulative impact with other Nationally Significant Infrastructure Projects which may come forward in the future and result in additional development at the proposed Friston National Grid substation and its environs. Such schemes potentially include the National Grid Ventures projects Nautilus and Eurolink, the Five Estuaries windfarm project, the North Falls windfarm project and the National Grid SCD1 and SCD2 projects. The potential impact which future connections to the National Grid substation would have on the interrelated group of heritage assets which surround the site needs to be a material consideration in any decision-making process.

7 References

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