



East Anglia ONE North Offshore Windfarm

Appendix 24.1

Archaeology and Cultural Heritage Consultation Responses

Environmental Statement Volume 3

Applicant: East Anglia ONE North Limited
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Glossary of Acronyms

ADBA	Archaeology and Cultural Heritage Desk Based Assessment
BGS	British Geological Survey
CoCP	Code of Construction Practice
DBA	Desk Based Assessment
DCO	Development Consent Order
DMRB	Design Manual for Roads and Bridges
EIA	Environmental Impact Assessment
ETG	Expert Topic Group
GI	Ground Investigation
GPA	Good Practice Advice
HDD	Horizontal Directional Drilling
HER	Historic Environment Record
HSG	Heritage Steering Group
LiDAR	Light Detection and Ranging
LVIA	Landscape and Visual Impact Assessment
MHCLG	Ministry of Housing, Communities and Local Government
NDHA	Non-Designated Heritage Assets
NMP	National Mapping Programme
NPPF	National Planning Policy Framework
NPS	National Policy Statement(s)
NSIP	Nationally Significant Infrastructure Project
OLEMS	Outline Landscape and Ecological Mitigation Strategy
ORPAD	Offshore Renewables Protocol for Archaeological Discoveries
OWSI	Outline Written Scheme of Investigation
PEIR	Preliminary Environmental Information Report
SCC	Suffolk County Council
SCCAS	Suffolk County Council Archaeological Service
SCDC	Suffolk Coastal District Council
SMR	Strip, Map and Record (excavation)
SMS	Strip, Map and Sample (excavation)
SPR	ScottishPower Renewables
SPS	Suffolk Preservation Society
WDC	Waveney District Council
WSI	Written Scheme of Investigation

Glossary of Terminology

Applicant	East Anglia ONE North Limited.
Development area	The area comprising the onshore development area and the offshore development area (described as the 'order limits' within the Development Consent Order).
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia ONE North windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia ONE North project Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.
Onshore cable corridor	The corridor within which the onshore cable route will be located.
Onshore cable route	This is the construction swathe within the onshore cable corridor which would contain onshore cables as well as temporary ground required for construction which includes cable trenches, haul road and spoil storage areas.
Onshore development area	The area in which the landfall, onshore cable corridor, onshore substation, landscaping and ecological mitigation areas, temporary construction facilities (such as access roads and construction consolidation sites), and the National Grid Infrastructure will be located.
Onshore infrastructure	The combined name for all of the onshore infrastructure associated with the proposed East Anglia ONE North project from landfall to the connection to the national electricity grid.
Onshore substation	The East Anglia ONE North substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.
Onshore substation location	The proposed location of the onshore substation for the proposed East Anglia ONE North project.

24.1 Archaeology and Cultural Heritage Consultation Responses

24.1.1 Introduction

1. This appendix to **Chapter 24 Archaeology and Cultural Heritage** covers those statutory consultation responses that have been received as a response to the Scoping Report (ScottishPower Renewables (SPR) 2017), the Preliminary Environmental Information Report (PEIR) (SPR 2019) and Expert Topic Group (ETG) Meetings. For archaeology and cultural heritage this ETG are also collectively referred to as the Heritage Steering Group (HSG).
2. Responses from stakeholders and regard given by the Applicant have been captured in **Table A24.1.1**.
3. As Section 42 consultation for the proposed East Anglia ONE North project was conducted in parallel with the proposed East Anglia TWO project, where appropriate, stakeholder comments which were specific to East Anglia TWO, but may be of relevance East Anglia ONE North, have also been included in the consultation responses for East Anglia ONE North.

Table A24.1.1 Consultation Responses Related to Chapter 24 Archaeology and Cultural Heritage

Consultee(s)	Date / Document	Comment	Response / where addressed in the ES
The following comments were received prior to consultation on the PEIR and were in response to the Scoping Report or direct consultation with stakeholders. These comments were taken into account in the production of the PEIR			
Suffolk County Council (SCC) and Suffolk Coastal District Council (SCDC)	08/12/2017 Scoping Response	Archaeological and heritage assessments and mitigation phases must be programmed into the proposed East Anglia TWO project at the earliest opportunity, with sufficient time allowed to enable fieldwork to be completed prior to the start of construction works, so as to avoid any delays to the development schedule. We would strongly advise that a dedicated archaeological consultant is appointed to the proposed East Anglia TWO project at this stage in project planning to try to ensure the smooth delivery of the archaeological requirements for the proposed East Anglia TWO project alongside other elements of the scheme.	Royal HaskoningDHV are currently providing consultancy support to the Applicant. Headland Archaeology have been appointed by the Applicant to undertake a detailed Archaeological Desk Based Assessment (ADBA) (Appendix 24.3); Geophysical Survey (Appendix 24.4); and settings assessment (Appendices 24.7 and 24.8). The results of these assessments inform this chapter, where relevant (see sections 24.5, 24.6 and 24.7).
SCC and SCDC	08/12/2017 Scoping Response	A settings impact assessment for above ground heritage assets should be undertaken and the impact of the proposals upon historic hedgerows, boundaries and other historic landscape elements should also be considered through the use of historic mapping and Historic Landscape Characterisation data.	These form part of the scope of the detailed ADBA undertaken by Headland Archaeology (Appendix 24.3). The settings assessment was also further progressed and completed post-ADBA, the results of which are detailed in Appendices 24.7 and 24.8 . The results of these assessments inform this chapter, where relevant (see sections 24.5, 24.6 and 24.7).
SCC and SCDC	08/12/2017 Scoping Response	SCCAS would advise that all areas which will be impacted upon by the different elements of the EA2 scheme, or which form possible option sites, should be subject to archaeological field assessment at this stage in considering the location, layout and design of the substation location and onshore cable route, to allow for preservation <i>in situ</i> where appropriate of any sites of	Geophysical survey data has been acquired, scrutinised and subject to archaeological assessment (where land access was granted) in order that archaeological information was fed directly into the onshore development area refinement and siting

Consultee(s)	Date / Document	Comment	Response / where addressed in the ES
		importance that might be defined (and which are currently unknown) and to provide information to contribute to the site selection process.	considerations for the proposed East Anglia ONE North project.
SCC and SCDC	08/12/2017 Scoping Response	The Scoping Report currently refers to trenching of the sub-station site, however, we would advise that all sites which will be impacted on by any element of the construction phase should be subject to trial trenching. Undertaking full archaeological evaluation will enable the results of the surveys to be used to assist with project programming and also to contribute to risk management. Evaluation at this stage will test the suitability of sites for development, given the reduced flexibility for mitigation through design once a sub-station location and cable route have been selected.	<p>Initial targeted trial-trenching is to be conducted over targeted areas (see section 24.6.1.2.2 and Table 24.6 of this chapter), as discussed in consultation with Suffolk County Council Archaeological Service (SCCAS). Although such investigatory works will not be completed in time for their results to inform and be incorporated within this chapter, it has been agreed with the HSG that the results works will at the earliest opportunity, inform the post consent mitigation strategy in relation to the archaeological and cultural heritage resource.</p> <p>Although such investigatory works will not be completed in time for their results to inform and be incorporated within this chapter, it has been agreed with the HSG that the results works will at the earliest opportunity, inform the post consent mitigation strategy in relation to the archaeological and cultural heritage resource.</p> <p>The Outline Written Scheme of Investigation (OWSI) has been produced and submitted with this Development Consent Order (DCO) application and is secured under the requirements of the draft DCO. The</p>

Consultee(s)	Date / Document	Comment	Response / where addressed in the ES
			<p>OWSI presents the strategy for undertaking initial informative stages (and subsequent further stages) of mitigation, post-consent.</p> <p>Post-consent documentation will include both further survey-specific WSIs; and mitigation (pre-construction and construction related) WSIs to be agreed with SCCAS and other HSG representatives, where appropriate.</p>
SCC and SCDC	08/12/2017 Scoping Response	Greater clarity should be given as to the nature, timing and extent of the evaluation work to be undertaken for this project. At present only trenching of the substation site is mentioned, without reference to evaluation of the other elements of the scheme such as the cable routes and other associated infrastructure.	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).
SCC and SCDC	08/12/2017 Scoping Response	SCDC as local planning authority have responsibility in relation to Grade II listed buildings so should be involved in consultation in relation to mitigation if listed buildings are involved.	Noted.
SCC and SCDC	08/12/2017 Scoping Response	From an archaeological point view, we would fully support the possibility of locating substations from different schemes together on a single site in order to reduce the overall impact on both above and below ground archaeology and the historic landscape as a whole. Again, there is potential to link up with sites which have already been developed for similar uses, but also if there was a possibility to utilise previously developed and therefore disturbed land, this is likely to reduce below ground archaeological impacts.	The co-locating of the National Grid substation and the onshore substation was identified as being the preferred approach during the site selection process.

Consultee(s)	Date / Document	Comment	Response / where addressed in the ES
Suffolk Preservation Society (SPS)	15/12/2017 Scoping Response	We note SPR proposals for assessing impact on designated and non-designated Heritage Assets. As noted previously by the Examining Authority for the sister project East Anglia Offshore Windfarm THREE there was uncertainty and concern with the adequacy of the assessment approach and methodology for heritage asset impact. We trust that the assessment of heritage assets and their setting within the study area for East Anglia TWO and the related onshore connections will be in accordance with Historic England's adopted guidance Good Practice Advice (GPA) 3: The Setting of Heritage Assets.	Detailed consideration of heritage assets and their setting has been undertaken in accordance with GPA 3, initially as part of the ADBA undertaken by Headland Archaeology (Appendix 24.3) and later progressed in Appendices 24.7 and 24.8 . The results of these assessments inform this chapter, where relevant (see sections 24.5, 24.6 and 24.7 of this chapter).
Historic England	08/12/2017 Scoping Response	A number of important listed buildings lie just outside the study area shown in the Scoping Report. These buildings, in particular a group of buildings at Thorpeness (including the House in the Clouds), St Andrews Church (nr Aldringham), Billeaford Hall, a group of buildings at Friston, and those in the southern part of Leiston need to be brought in to the initial study, even if these are scoped out following analysis. We also would like the study to consider the higher grade buildings in Leiston (such as the Grade II* Longshop) even if these are likewise scoped out later. Important designated heritage assets also need to be included in the list of sites to be included in the Landscape and Visual Amenity study, and the heritage viewpoints will need to be discussed and agreed prior to the PEI stage, with ourselves and the Local Planning Authority (LPA).	Detailed consideration of Listed Buildings and their settings (in respect to contribution to heritage significance) has been undertaken, initially as part of the ADBA undertaken by Headland Archaeology (Appendix 24.3) and later progressed in Appendices 24.7 and 24.8 . The results of these assessments inform this chapter, where relevant (see sections 24.5, 24.6 and 24.7 of this chapter).
Historic England	08/12/2017 Scoping Response	If the larger turbines are being considered then a corresponding study will need to be undertaken that demonstrates the likely impact of these turbines on designated coastal heritage assets. The study area and numbers of heritage assets would ideally be considered at the scoping stage.	The impact of offshore infrastructure on the significance of coastal heritage assets has been addressed as part of a screening exercise (see Appendix 24.8). The results from which inform this chapter, where relevant (see

Consultee(s)	Date / Document	Comment	Response / where addressed in the ES
			sections 24.5, 24.6 and 24.7 of this chapter).
Historic England	08/12/2017 Scoping Response	We have a specific concern in relation to cumulative impact. In our view more also needs to be done to specifically identify the present and planned offshore arrays and numbers of turbines and include these in the cumulative impact study.	Understood to mainly relate to Marine Archaeology and Cultural Heritage Chapter (see Chapter 16 Marine Archaeology and Cultural Heritage). The impact of offshore infrastructure on the significance of coastal heritage assets has been addressed as part of a screening exercise (see Appendix 24.8).
Historic England	08/12/2017 Scoping Response	In terms of baseline studies, we would recommend that the most appropriate geophysical techniques are utilised, which in some cases may result in more than one geophysical technique being applied to a given area. This would maximise the chances of identifying any archaeological features, and hopefully minimise the risk of any unexpected finds.	Detailed magnetometry is being employed as standard across the onshore development area. Alternative techniques may be considered in the post-consent stages, as part of initial informative stages of mitigation, as appropriate.
Historic England	08/12/2017 Scoping Response	More is needed to show how cultural heritage investigations can be incorporated and planned for adequately. In doing so this will enable to demonstrate clearly the steps and timescales proposed to enable the WSI to function effectively, directing the proposed East Anglia TWO project in view of other matters through to remaining post-consent delivery.	A staged approach to assessment, survey and investigation has commenced with detailed ADDBA, walkovers / site visits and archaeological geophysical survey undertaken (July - December 2018 and March - May 2019). Post-consent survey approach outlined in Table 24.3 and as outlined in consultation response to SCCAS (dated 08/12/2017). The OWSI has been produced and submitted with this DCO application

Consultee(s)	Date / Document	Comment	Response / where addressed in the ES
			and is secured under the requirements of the draft DCO. The OWSI presents the strategy for undertaking initial informative stages (and subsequent further stages) of mitigation, post-consent.
Historic England	08/12/2017 Scoping Response	An agreed WSI will set out when, how and why (additional) archaeological mitigation measures recommended in the PEI are to be implemented through detailed and direct scheme specific method statements. The delivery of such mitigation measures, through method statements, should therefore be addressed in regard to archaeological objectives with attention on the time and scale of completing and reporting on relevant individual schemes of investigation. In doing so this will enable survey opportunities to be maximised and appropriate information made available to inform the design process. Furthermore, the WSI should include a strategy for monitoring the effects over all phases of the development.	As above, a staged approach to assessment, survey and investigation has been undertaken (see Appendices 24.3, 24.4, 24.7 and 24.8), with a post-consent survey approach outlined in Table 24.3 and as outlined in consultation response to SCCAS (dated 08/12/2017).
Historic England	08/12/2017 Scoping Response	The PEI will need to address the potential onshore and inter-tidal zone impact on Cultural Heritage and Archaeology including direct and indirect (i.e. setting) impacts on designated heritage assets and direct impacts on above-ground and buried undesignated heritage assets.	Inter-tidal impacts are addressed under the Marine Archaeology and Cultural Heritage Chapter (see Chapter 16 Marine Archaeology and Cultural Heritage). The impact of offshore infrastructure on the significance of coastal heritage assets has been addressed as part of a screening exercise (see Appendix 24.8).
The Planning Inspectorate	20/12/2017 Scoping Response	The Scoping Report sets out that there are five Scheduled Monuments up to 2km from the onshore study area. Further differing buffers are noted for Grade II* and Grade	Agreement of study areas was reached during the first ETG Meeting (26 th April 2018) following expansion to include

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		<p>II buildings, Registered Battlefields and Registered Parks and Gardens. The onshore study area used to inform the assessment in the ES should be fully justified and should be established based on the extent of the likely impacts.</p>	<p>wider heritage setting considerations and to include heritage specific viewpoints for the substation(s).</p> <p>The onshore study areas were further established as part of the Written Scheme of Investigation (WSI) for ADBA and the subsequent ADBA undertaken by Headland Archaeology (see Appendix 24.3). The results of the ADBA are discussed and summarised within sections 24.5 and 24.6 of this chapter.</p>
The Planning Inspectorate	20/12/2017 Scoping Response	<p>The Scoping Report notes in this aspect chapter that effects during decommissioning have the potential to be greater than construction. This conclusion is not intrinsically linked to archaeology and cultural heritage and therefore the Applicant is required to ensure that such conclusions are consistent throughout the PEI. For example, increased ‘grubbing out’, which is identified in this chapter, is not referred to in other aspect chapters such as Air Quality.</p>	<p>This is based on previous discussion with / feedback from Historic England on similar schemes, in direct reference to sub-surface archaeological remains, and not wider (other) aspect chapters as we understand it.</p>
The Planning Inspectorate	20/12/2017 Scoping Response	<p>The Scoping Report sets out the mitigation that is to be considered however it is not set out as to when this will be considered. The PEI should clearly set out any mitigation required and this should be agreed with relevant statutory consultees and secured in the DCO.</p>	<p>As above, a staged approach to assessment, survey and investigation has been undertaken (see Appendices 24.3, 24.4, 24.7 and 24.8), with a further post-consent survey approach outlined in Table 24.3 and as outlined in consultation response to SCCAS (dated 08/12/2017).</p> <p>An OWSI has been produced and submitted with this DCO application, secured under the requirements of the</p>

Consultee(s)	Date / Document	Comment	Response / where addressed in the ES
			<p>draft DCO. The OWSI presents the strategy for undertaking initial informative stages (and subsequent further stages) of mitigation, post-consent.</p> <p>Post-consent documentation will include both further survey-specific WSIs; and mitigation (pre-construction and construction related) WSIs to be agreed with SCCAS and other HSG representatives, where appropriate.</p>
SCDC: Design and Conservation Manager	20/04/2018 Method Statement Response	Para. 33: SCDC's remit extends to all listed buildings and not just those that are Grade II. Therefore, to exclude SCDC in favour of Historic England in respect of Grade I and Grade II* listed buildings, as proposed here, is wrong. Further, we have our own Landscape Manager who is very capable of commenting on Historic Landscape considerations and should be included (and not excluded in favour of SCC, as suggested here). SCDC should be part of the HSG. (See also para. 82.).	This was updated and reflected in the Written Scheme of Investigation (WSI) for DBA (Royal HaskoningDHV, 2018b) and addressed in the ADBA itself (Appendix 24.3). The results of the ADBA are discussed and summarised within sections 24.5 and 24.6 of this chapter.
SCDC: Design and Conservation Manager	20/04/2018 Method Statement Response	Para. 34 – Table 4.1 Data Sources – ditto this table of data sources where we are identified as providing data in respect of Grade II listed buildings only – again, we do so for Grade I, II* and II listed buildings. We can also supply data on identified Non Designated Heritage Assets that are buildings or structures in addition to the criteria that can be used by the DBA for identifying new ones within the affected area (to ensure a measure of consistency). Locally listed parklands should also be taken into account (although none may be affected).	This was updated and reflected in the WSI for ADBA (Royal HaskoningDHV 2018b) and addressed in the ADBA itself (Appendix 24.3). The results of the ADBA are discussed and summarised within sections 24.5 and 24.6 of this chapter.

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SCDC: Design and Conservation Manager	20/04/2018 Method Statement Response	Section 4.1.1.2 There is a Protected Wreck off the shore of Dunwich but I assume that this is outside the affected area – onshore anyway but may need to be considered offshore.	Noted. Any inter-tidal and marine impacts are addressed under the Marine Archaeology and Cultural Heritage Chapter (see Chapter 16 Marine Archaeology and Cultural Heritage).
SCDC: Design and Conservation Manager	20/04/2018 Method Statement Response	Para. 42 – why are the listed buildings not listed and summarised here, also? It would have been useful to know which ones had already been identified, as has happened with Scheduled Monuments.	Listed buildings are identified as part of the detailed ADBA (Appendix 24.3) and taken forward for further assessment, where relevant, re. impacts resulting from change in setting within Appendix 24.7 . The results of the ADBA are discussed and summarised within sections 24.5 and 24.6 of this chapter.
SCDC: Design and Conservation Manager	20/04/2018 Method Statement Response	Section 4.1.1.3 – this section on Non Designated Heritage Assets (NDHA) has a strong archaeological focus and appears to make no allowance for the likelihood of NDHAs that are buildings or structures, which are not yet identified, being affected. NDHAs can also be landscapes, ancient woodland and other areas and places and allowance must be made for the scope for these as NDHAs to be identified.	This was updated and reflected in the WSI for ADBA (Royal HaskoningDHV 2018b) and addressed in the ADBA itself (Appendix 24.3). The results of the ADBA are discussed and summarised within sections 24.5 and 24.6 of this chapter.
SCDC: Design and Conservation Manager	20/04/2018 Method Statement Response	This section, as I say, is very archaeology-focussed. The assumption is that the historic landscape will be picked up as some kind of separate LVIA type exercise but it should be incorporated here.	This was updated and reflected in the WSI for ADBA (Royal HaskoningDHV 2018b) and addressed in the ADBA itself (Appendix 24.3). The results of the ADBA are discussed in section 24.5 of this chapter.
SCDC: Design and Conservation Manager	20/04/2018 Method Statement Response	Section 4.2 Planned data collection – again this section has a heavy archaeology focus. I would expect the survey work tabulated here to include that needed to identify designated and [other] heritage assets; an assessment of	This was updated and reflected in the WSI for ADBA (Royal HaskoningDHV

Consultee(s)	Date / Document	Comment	Response / where addressed in the ES
		their significance; identification of their setting; and an assessment of how the setting contributes to the assets' significance. This survey work would be through DBA or field identification of these assets, historic map regression, site visits, documentary photographs, all leading to the production of a Heritage Asset Assessment. I can't understand why this is omitted here but it should certainly be within this scope of work.	2018b) and addressed in the ADBA itself (Appendix 24.3). Detailed consideration of heritage assets and their setting (in direct reference to contribution to heritage significance) has been undertaken in accordance with GPA 3 (Appendices 24.3 and 24.7). The results of the setting assessment are discussed in sections 24.5, 24.6 and 24.7 of this chapter.
SCDC: Design and Conservation Manager	20/04/2018 Method Statement Response	Para. 73 – obviously, the new NPPF and NPPG are in draft form but these should be referred to here.	Reference to the updated and revised National Planning Policy Framework (NPPF) and NPPG are made within this chapter.
SCDC: Design and Conservation Manager	20/04/2018 Method Statement Response	Para. 75 – I dislike the standardised matrix approach to impact assessment, as proposed here, and I believe that Historic England does, also (confirmed by Will Fletcher). It is a pseudo-scientific approach imported from EIAs and LVIA's and should not be directly applied for use in relation to heritage assets that are buildings or structures, in my view. No Heritage Asset Assessments and Impact Assessments that I regularly read ever use such an approach and it should not be employed here for the asset types with which I am familiar. However, I don't expect this advice to be taken.	The matrices will be maintained and utilised as part of a standardised approach to the wider Environmental Impact Assessment (EIA). The archaeology and cultural heritage chapter, and specifically associated appendices, will be underpinned by professional judgment, as part of a more qualitative approach, with a robust and reasoned narrative, wherever possible. See section 24.4 of this chapter. Subsequent agreement during the first ETG Meeting (26th April 2018). ETG broadly agreed with the assessment methodology proposed in the Archaeology and Cultural Heritage

Consultee(s)	Date / Document	Comment	Response / where addressed in the ES
			Method Statement (given the lack of an industry standard approach to heritage assessment within the framework of EIA), however, recommendations were made and have been taken into consideration.
SCDC: Design and Conservation Manager	20/04/2018 Method Statement Response	Table 5.1 is a case in point: conservation areas are a statutory designation and yet some to be are classified here as being of 'medium importance' in terms of their 'heritage significance'. Who decides which conservation areas have 'very important buildings'? What are they? How many are needed to be a conservation area of 'high' importance rather than 'medium'. I find this tabular categorisation specious.	Conservation Areas have been retained in both medium and high heritage importance categories within this chapter.
SCDC: Design and Conservation Manager	20/04/2018 Method Statement Response	Table 5.2 – more tabular categorisation. I suggest that the tests that are applied are those that are contained within the enabling legislation and the NPPF, backed up by case law.	Noted. Agreed. EN-1: Overarching National Policy Statement (NPS) for Energy will come to the fore here, as will EN-3: NPS for Renewable Energy Infrastructure and EN-5: NPS for Electricity Networks Infrastructure. NPPF will also be of relevance.
SCDC: Design and Conservation Manager	20/04/2018 Method Statement Response	Table 5.3 – see above. The text refers to the use of professional judgment in arriving at qualitative views and this is welcome.	Noted.
SPS	24/04/2018 Method Statement Response	In terms of the desk-based assessment and non-designated heritage assets, the draft Method Statement (as far as I can see) currently refers only to below-ground heritage assets. This also needs to include an assessment of undesignated built heritage assets, e.g. the potential for the identification of further buildings that are worthy of	This was updated and reflected in the WSI for ADBA (Royal HaskoningDHV 2018b) and addressed in the ADBA itself (Appendix 24.3). The results of the ADBA are discussed and

Consultee(s)	Date / Document	Comment	Response / where addressed in the ES
		Listing or Local Listing (does the LPA have a local List for this area?).	summarised within sections 24.5 and 24.6 of this chapter.
SPS	24/04/2018 Method Statement Response	In terms of the proposed Archaeology surveys, this is pretty comprehensive. However, in terms of best practice, the archaeological fieldwalking, metal-detecting and trial trenching for both the substation and cable routes should be undertaken in advance of consent. Certainly, and at the very least, any potentially significant archaeological sites on the cable route that are identified in the DBA and geophysical survey (and by other non-intrusive surveys) should be trial-trenched in advance of consent.	Post-consent survey approach outlined in Table 24.3 and as outlined in consultation response to SCCAS (dated 08/12/2017).
SPS	24/04/2018 Method Statement Response	The earthwork condition survey must be undertaken pre-consent and also prior to trial-trenching.	Post-consent survey approach outlined in Table 24.3 and as outlined in consultation response to SCCAS (dated 08/12/2017).
SPS	24/04/2018 Method Statement Response	Preservation <i>in situ</i> (p.19). This must not be left until the construction stage. Archaeological sites of significance requiring preservation <i>in situ</i> , and avoidance by the scheme, must be identified pre-consent.	This is in reference to the implementation of 'Preservation <i>in situ</i> requirements' at construction. The identification of the need / requirement in respect of specific anomalies / features / sites would be identified in both pre- and post-consent survey work undertaken.
SPS	24/04/2018 Method Statement Response	Strip, map and record excavations should be undertaken pre-construction to avoid delays to the construction schedule and potential comprises to the archaeological mitigation scheme.	Strip Map and Record (SMR) excavation, also known as Strip, Map and Sample (SMS) excavation, may be undertaken during the broader construction window, but as bespoke pieces of archaeological led and programmed works, prior to construction activity following on after

Consultee(s)	Date / Document	Comment	Response / where addressed in the ES
			upon satisfactory completion of any such works.
SPS	24/04/2018 Method Statement Response	There needs to be discussion and agreement of funding for display, promotion and management of archaeological discoveries on the proposed East Anglia TWO project, including enhancement of the HER, and also enhancement of the historic environment. The work will help to offset the harm that is likely to be caused by the proposed East Anglia TWO project to the historic environment and provide a lasting legacy.	Data gathering exercises undertaken for the purpose of the proposed East Anglia ONE North project will enhance public understanding by adding to the archaeological record (e.g. through the accumulation of publicly available data). For example, previously unrecorded sites / features identified as a result of survey / evaluation works undertaken for the proposed East Anglia ONE North project will be added to the HER. The OWSI submitted with this DCO application, also includes a commitment for the completion of studies to professional archaeological standards, the results of which must be made publicly available where possible. Further opportunities for the display, promotion and management of archaeological discoveries will be discussed between the Applicant, their advisers and the HSG as the proposed East Anglia ONE North project progresses.
Expert Topic Group (HSG)	26/04/2018 ETG Meeting Minutes	Discussion particularly focused on the potential impact to the heritage setting of the Listed Building (Aldringham Court Nursing Home - Raidsend) at the Aldeburgh Road woodland crossing point. ETG recommends that more work needs be done to better understand the potential impact of woodland removal at that location and what is	This is addressed as part of the settings assessment. The settings assessment was initiated in the ADDBA (Appendix 24.3) and has been progressed and completed within Appendix 24.7 . The results of the

Consultee(s)	Date / Document	Comment	Response / where addressed in the ES
		possible from re-planting mitigation in order to be able to support a substation location west of Aldeburgh Road.	assessment work inform this chapter, where relevant (see sections 24.5, 24.6 and 24.7).
Expert Topic Group (HSG)	26/04/2018 ETG Meeting Minutes	Heritage setting impacts of the substation should be considered closely with the LVIA particularly ensuring viewpoints can be utilised in both heritage and LVIA assessments. With heritage specific viewpoints to also be identified.	<p>The settings assessment was initiated in the ADBA (Appendix 24.3) and has been progressed and completed within Appendix 24.7. The results of the assessment work inform this chapter, where relevant (see sections 24.5, 24.6 and 24.7).</p> <p>The heritage and Landscape and Visual Impact Assessment (LVIA) consultants for the proposed East Anglia ONE North project have worked closely together to deliver co-ordinated assessments and mitigation. Heritage specific viewpoints were identified and photomontages produced, in order to inform assessment alongside site visits.</p>
Expert Topic Group (HSG)	26/04/2018 ETG Meeting Minutes	ETG recommends that aerial photographic, LiDAR, topographic and geological data is used to inform the forthcoming Archaeological DBA.	This was updated and reflected in the WSI for ADBA (Royal HaskoningDHV, 2018b) and addressed in the ADBA itself (Appendix 24.3). The results of the ADBA are discussed and summarised within sections 24.5 and 24.6 of this chapter.
Expert Topic Group (HSG)	26/04/2018 ETG Meeting Minutes	Data with respect to locally listed buildings, parklands and conservation areas should be requested from SCDC.	This was updated and reflected in the WSI for ADBA (Royal HaskoningDHV, 2018b) and addressed in the ADBA itself (Appendix 24.3). The results of the ADBA are discussed and

Consultee(s)	Date / Document	Comment	Response / where addressed in the ES
			summarised within sections 24.5 and 24.6 of this chapter.
Expert Topic Group (HSG)	26/04/2018 ETG Meeting Minutes	ETG recommends that historic landscape should be recognised as within the methodology and scoped in for the allowance of the likelihood of NDHAs which are not yet identified, or being affected. Methodology for the production of the Heritage Asset Assessment should be clarified post-ETG meeting and included within the ADBA and survey work.	This was updated and reflected in the WSI for ADBA (Royal HaskoningDHV, 2018b) and addressed in the ADBA itself (Appendix 24.3). The results of the ADBA are discussed and summarised within sections 24.5 and 24.6 of this chapter.
Expert Topic Group (HSG)	26/04/2018 ETG Meeting Minutes	Historic map regression should also include, where available, title and enclosure maps held at the Suffolk Record Office.	This was updated and reflected in the WSI for ADBA (Royal HaskoningDHV, 2018b) and the addressed in the ADBA itself (Appendix 24.3). The results of the ADBA are discussed in section 24.5 of this chapter.
Expert Topic Group (HSG)	26/04/2018 ETG Meeting Minutes	ETG recommends as a minimum the targeting of metal detecting and field-walking surveys. ETG recommends metal detecting and field-walking to be undertaken pre-consent, but agrees that this can be reviewed after the ADBA has been undertaken and the results discussed in further consultation with them.	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).
Expert Topic Group (HSG)	26/04/2018 ETG Meeting Minutes	ETG recommends that an above ground heritage assets assessment is included within the walkover associated with the ADBA, and that this also considers landscape designations, as well as identification and initial assessment of any earthworks and field (including county and parish) boundaries.	This was updated and reflected in the WSI for ADBA (Royal HaskoningDHV, 2018b) and addressed in the ADBA itself (Appendix 24.3). The results of the ADBA are discussed and summarised in sections 24.5 and 24.6 of this chapter.
Expert Topic Group (HSG)	26/04/2018 ETG Meeting Minutes	ETG recommends that the trial trenching is undertaken along the cable route and the construction compounds pre-	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as

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		consent or as a minimum at key pinch points along the cable route.	outlined in consultation response to SCCAS (dated 08/12/2017).
Expert Topic Group (HSG)	26/04/2018 ETG Meeting Minutes	ETG recommends that as a minimum the initial stages of the earthwork condition survey is undertaken within and as part of the walkover study. This can be drawn out and agreed within the forthcoming WSI for DBA.	This has been updated and reflected in the WSI for ADBA (Royal HaskoningDHV 2018b) and addressed in the ADBA itself (Appendix 24.3). The results of the ADBA are discussed and summarised within sections 24.5 and 24.6 of this chapter. Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).
Expert Topic Group (HSG)	26/04/2018 ETG Meeting Minutes	ETG recommends SPR makes provision for and commits to post-excavation public exhibitions and events, as part of the mitigation works.	Further opportunities for the display, promotion and management of (and events around) archaeological discoveries will be discussed between the Applicant, their advisers and the HSG as the proposed East Anglia ONE North project progresses.
Expert Topic Group (HSG)	26/04/2018 ETG Meeting Minutes	Study area needs to be expanded to include wider cultural heritage setting considerations, and to include landscape and heritage specific viewpoints of the substation.	Detailed consideration of heritage assets and their setting (in respect to contribution to significance) has been undertaken in accordance with GPA 3, initially as part of the ADBA undertaken by Headland Archaeology (Appendix 24.3) and later progressed and finalised to inform this chapter (see Appendix 24.7). The results of the ADBA are discussed and summarised in sections 24.5 and 24.6 of this chapter.

Consultee(s)	Date / Document	Comment	Response / where addressed in the ES
			The heritage and LVIA consultants for the proposed East Anglia ONE North project have worked closely together to deliver co-ordinated assessments and mitigation. Heritage specific viewpoints were identified and photomontages produced, in order to inform assessment alongside site visits.
Expert Topic Group (HSG)	26/04/2018 ETG Meeting Minutes	ETG broadly agrees with the assessment methodology proposed in Archaeology and Cultural Heritage Method Statement (given the lack of an industry standard approach to heritage assessment within the framework of EIA).	Noted.
Expert Topic Group (HSG)	26/04/2018 ETG Meeting Minutes	ETG recommends that all conservation areas should be assigned high importance, as a matter of course.	Conservation Areas have been retained in both medium and high heritage importance categories within this chapter.
Expert Topic Group (HSG)	26/04/2018 ETG Meeting Minutes	ETG recommends that operational impact on cultural heritage setting from the buried cable is scoped back in for assessment if a western substation zone is selected (due to potential tree removal at Aldeburgh Road crossing and potential setting impact on Grade II Listed Building – Raldsend).	Agreed with ETG. This is included in onshore settings assessment in Appendix 24.3 and 24.7.
Historic England	05/07/2018 WSI DBA response	We are broadly content with the WSI as it stands; please find a couple of additional points below.	Noted.
Historic England	05/07/2018 WSI DBA response	As discussed, we are content and broadly agree with the Scope of the document.	Noted.
Historic England	05/07/2018 WSI DBA response	I have already set out our views about the use of matrices in relation to the 2006 Design Manual for Roads and Bridges (DMRB) document which pre-dates the NPPF and	Noted. Although the matrices will be maintained and utilised as part of a

Consultee(s)	Date / Document	Comment	Response / where addressed in the ES
		is over 10 years out of date. I know you are aware of our reservations in that regard, however it is worth saying that we prefer a simple narrative description based on an exploration of the significance of a heritage asset and the way in which the setting contributes to this significance of that asset. It is important when undertaking the assessment work for the DBA to ensure the sites are considered in this way.	standardised approach to the wider EIA. The archaeology and cultural heritage chapter, and associated appendices (specifically the ADBA), will be underpinned by professional judgment, as part of a more qualitative approach, with a robust and reasoned narrative, wherever possible. See Appendices 24.3 and 24.7 .
Historic England	05/07/2018 WSI DBA response	In terms of sources we do not have anything specifically to contribute by way of additions but we are aware of a number of internet resources that have photographs and details of Raidsend House, which it would be useful to include. I do not have the details but have been seen images produced from internet sources. We also wondered if the architect had left a legacy archive and whether original drawing may exist for the site and the layout of the grounds.	SCC Senior Landscape Officer has suggested some further possible information sources, which were checked and accessed as part of the ADBA (Appendix 24.3). The results of the ADBA are discussed and summarised within section 24.5 and 24.6 of this chapter.
Historic England	05/07/2018 WSI DBA response	We also wanted to note that BGS borehole data may be useful to determine if there are any wet or potentially waterlogged deposits and potentially any Holocene or pre-Holocene beach deposits around the area of the landing. We are not aware of anything specific at this location but the Suffolk Coast is known to be a place where these deposits do exist?	The ADBA assess geological data available online from the British Geological Survey (BGS) to inform an account of the underlying geology of the onshore development area. It is further proposed that an archaeological watching brief / geoarchaeological monitoring be undertaken in line with engineering-led Ground Investigation (GI) works to further inform upon potential deposits of geoarchaeological / archaeological interest. This will be subject to a survey-specific WSI to be agreed with the HSG in advance. No engineering-led GI has been undertaken to date, or is anticipated

Consultee(s)	Date / Document	Comment	Response / where addressed in the ES
			within the pre-consent stages of the proposed East Anglia ONE North project.
Historic England	05/07/2018 WSI DBA response	Finally, HE guidance some of which is due to change, if you want to know if we have any updated guidance or to get the latest versions please let me know.	Updated guidance was requested by Royal HaskoningDHV via email (06/07/2018). Reference to updated guidance is included within this Chapter and associated Appendices, where relevant.
SCC Senior Landscape Officer	07/06/2018 WSI DBA response	Re. Raidsend other sources of information. <i>Does local info exist at Suffolk Record Office or with local history Soc?</i> See.... http://aldringham.onesuffolk.net/parish-past-and-present/ Large Archive of papers at Leeds University also, see: https://explore.library.leeds.ac.uk/special-collections-explore/8545	These sources were checked as part of the ADBA (Appendix 24.3). The results of the ADBA are discussed and summarised in sections 24.5 and 24.6 of this chapter.
SCCAS	03/07/2018 WSI DBA response	Table 4.1 – Historic Environment Record (HER) - the document references updated HER searches – these – and in fact the study area - should include the areas under consideration for proposed access roads, and a buffer to the south towards Friston.	Study area parameters assessed as part of the ADBA and this chapter are detailed in section 24.3.1 of this chapter.
SCCAS	03/07/2018 WSI DBA response	Table 4.1 - Additional to HER searches, provision should be made for research into reports and archives held by the HER, where appropriate.	Sources consulted during compilation of the ADBA (Appendix 24.3) are detailed in section 24.4.2 of this chapter.
SCCAS	03/07/2018 WSI DBA response	Paragraphs 60-63 - The rapid earthwork survey etc should mention that it will be done in accordance with HE 'Understanding the Archaeology of Landscapes; a guide to good recording practice 2nd ed' (2017), although this is implicit. It should refer more generally to identifying areas	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).

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		out of recent cultivation as holding potential for earthworks, as a catch all.	
SCCAS	03/07/2018 WSI DBA response	It would be helpful if there could be commentary / observations on any constraints to field evaluation, whilst they do the walkover, as this may save time later on.	Any constraints encountered (e.g. access, overgrowth) during the walkover survey are detailed in the ADBA (Appendix 24.3). The results of the ADBA are discussed in section 24.5 of this chapter. Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).
SCCAS	02/07/2018 WSI Geophysical Survey	Thank you for this amended WSI which we are happy to approve in terms of methodology. We would again raise our concern regarding further refinement of any elements of the development scheme beyond the already refined area, until the results of the archaeological evaluation surveys are available. This is in order to retain the opportunity for flexibility within the scheme design, allowing for preservation <i>in situ</i> / avoidance of significant archaeological remains as appropriate.	Noted. Geophysical survey data has been acquired, scrutinised and subject to archaeological assessment (where land access was granted) in order that archaeological information was fed directly into the onshore development area refinement and siting considerations for the proposed East Anglia ONE North project.
Expert Topic Group (HSG)	23/01/2019 ETG Meeting Minutes	The HSG raised concerns regarding the lack of pre-consent trial trenching and advised that there is sufficient time available to undertake trenching work before DCO submission. Every effort should be made to undertake trial trenching pre determination especially for key areas of the scheme.	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).
Expert Topic Group (HSG)	23/01/2019 ETG Meeting Minutes	The potential presence of earthwork features needs to be considered so that they can be mitigated effectively. A full systematic earthwork assessment is necessary in line with	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as

Consultee(s)	Date / Document	Comment	Response / where addressed in the ES
		an approved WSI. This should be undertaken pre determination so that this can be factored into design refinement considerations.	outlined in consultation response to SCCAS (dated 08/12/2017).
Expert Topic Group (HSG)	23/01/2019 ETG Meeting Minutes	<p>The HSG made a number of recommendations regarding elements to be considered as part of the settings assessment:</p> <ul style="list-style-type: none"> • Friston War Memorial and Friston Post Mill are to be scoped back into the settings assessment and subject to further consideration as the project progresses with respect to heritage settings site visits and heritage viewpoints / visualisations. • Early involvement of landscape colleagues to produce mitigation planting which is effective but does not override the existing landscape. • Mitigation planting around Aldringham Court should form part of the Landscape Management Plan. • Views from The Green to be included towards the development. • Views/viewpoints from the church tower of the Church of St Mary to be considered, associated with heritage open days and experiencing the views from the asset. • ETG recommended including a cultural heritage specific viewpoint on Grove Road. 	The settings assessment has been progressed since the submission of the PEIR (see Appendix 24.7) and takes into consideration the recommendations made by the HSG in the January 2019 ETG meeting. The results of the settings assessment inform this this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).
Expert Topic Group (HSG)	23/01/2019 ETG Meeting Minutes	A screening exercise of assets to be considered as part of a heritage settings assessment with respect to impacts from the presence of infrastructure offshore should include consideration of assets designed to look out to sea. The group value of these assets should also be considered as well as important views from coastal Conservation Areas. Recommendations on assets worthy of inclusion were	A screening exercise has been undertaken, in line with recommendations made by the HSG, which addresses the impact of the offshore infrastructure on the significance of coastal heritage assets (see Appendix 24.8), the results of

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		suggested by the HSG, with further recommendations supplied by the Southwold and Reydon Society via the Suffolk Preservation Society.	which inform this Chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).
Expert Topic Group (HSG)	23/01/2019 ETG Meeting Minutes	ETG recommended geophysical survey of wider scheme aspects (overhead realignment areas, water management, offsite access areas, and those areas not in the Proposed Development Area following refinement) and in fields where access wasn't previously possible.	Where possible (land access permitting), further geophysical survey has been undertaken in areas not previously accessible for the PEI stage, the results of which are detailed in Appendix 24.4 and inform this chapter where relevant (see sections 24.5 and 24.6 of this chapter). Other areas still requiring completion of geophysical survey will be undertaken, again land access permitting, as discussed in consultation with SCCAS. Although such investigatory works will not be completed in time for their results to inform and be incorporated within this chapter, it has been agreed with the HSG that the results works will at the earliest opportunity, inform the post consent mitigation strategy in relation to the archaeological and cultural heritage resource.
Expert Topic Group (HSG)	23/01/2019 ETG Meeting Minutes	Metal detecting and targeted field walking to be undertaken, again with priority given to those inflexible areas / at pinch points as well as within wider scheme aspects. The ETG recommendations were that this would ideally be undertaken pre-consent.	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017). Given anticipated timescales and the logistics associated with coordinating optimum conditions for fieldwalking across potentially multiple land parcels with

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			various access provisions, field-walking will not be undertaken.
Expert Topic Group (HSG)	23/01/2019 ETG Meeting Minutes	“Outreach” (public engagement) is included as proposed mitigation.	Further opportunities for the display, promotion and management of (and events around) archaeological discoveries will be discussed between the Applicant, their advisers and the HSG as the proposed East Anglia ONE North project progresses.
The following comments were made in response to the PEIR and were taken into account in the production of this ES			
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	The AONB Partnership have concern about the impact on the nationally designated AONB during the construction phase of the installation of the cables. In particular it raises concern about impacts on cultural heritage during construction and operation. The proposals have the potential to negatively impact the archaeology and historic assets of the AONB and associated hinterland.	Potential impacts upon all archaeology and cultural heritage assets (as indicated by known / available data) are considered in section 24.6 of this chapter, including those within the AONB (where within the parameters of the study areas and onshore development area). The impact of offshore infrastructure on the significance of coastal heritage assets has been addressed as part of a screening exercise (see Appendix 24.8).
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Consultation Response	Works should recognise the importance of archaeological and historic asset features in the AONB and systems should take a precautionary principle to avoid damage and where damage cannot be avoided to safeguard such features.	As above, potential impacts upon all archaeology and cultural heritage assets (as indicated by known / available data) are considered in section 24.6 of this chapter, including those within the AONB (where within

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			<p>the parameters of the study areas and onshore development area).</p> <p>The impact of offshore infrastructure on the significance of coastal heritage assets has been addressed as part of a screening exercise (see Appendix 24.8).</p>
SPS	20/03/2019 Section 42 Consultation Response	SPS objects to the inadequate information provided regarding the impacts of offshore and onshore elements on the cultural heritage and landscape value as evidenced by the PEIR, including an absence of any assessment of the offshore impacts on the heritage coastline and in particular the AONB.	<p>The settings assessment has been progressed since the submission of the PEIR (see Appendix 24.7). The results of the settings assessment inform this this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).</p> <p>A screening exercise has been undertaken which addresses the impact of the offshore infrastructure on the significance of coastal heritage assets (see Appendix 24.8), the results of which inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).</p>
SPS	20/03/2019 Section 42 Consultation Response	SPS objects to the absence of trial trenching prior to submission of the DCO in areas of known archaeological sensitivity.	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).
SPS	20/03/2019 Section 42 Consultation Response	SPS objects to the lack of analysis of the cumulative landscape and heritage impacts of EA1(N) with EA2, National Grid substation and Sizewell C. Clarification is required on the impacts on the special qualities of the AONB and its setting, including the cumulative HGV and	Cumulative impacts are addressed in section 24.7 of this chapter and Appendix 24.2 . As well as consideration made to East Anglia ONE North in conjunction with East

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		other vehicular movements during the construction phase of the offshore and onshore infrastructure.	Anglia TWO in Appendices 28.7 and 28.8 .
SPS	20/03/2019 Section 42 Consultation Response	Settlements along the Heritage Coast include numerous heritage assets which historically and functionally relate to the sea and derive their significance from their relationship to it. It is therefore necessary to consider the potential impact on the setting of designated heritage assets both in daylight and during the hours of darkness when illuminated.	A screening exercise has been undertaken which addresses the impact of the offshore infrastructure on the significance of coastal heritage assets (see Appendix 24.8), the results of which inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).
SPS	20/03/2019 Section 42 Consultation Response	The Cultural Heritage Chapter (28) of the PEIR does not include an assessment of the impacts of the offshore element of the project on the heritage of the coastline. Aldeburgh, Southwold, Orford, South Lowestoft and Dunwich are all designated conservation areas which are characterised by their coastal location and relationship with the sea and make important contributions to the special qualities of the AONB. For example: sea defences such as Aldeburgh Martello tower; Southwold and Orford Ness lighthouses; Covehithe and Walberswick churches, St Bartholomew's Church Corton which has received a grant from the MHCLG Coastal Revival Fund with the view to restoring the church tower as a coastal viewing point; sea resort architecture including the House in the Clouds at Thorpeness; and other domestic architecture such as Marine Villas in Southwold that have been designed to capture views of the sea. Furthermore, the conservation areas along the Suffolk coastline also have key views that need to be fully identified and assessed in order to properly quantify the cultural heritage impacts of the offshore development. It is crucial to consider the impact on the setting of these heritage assets and coastline both in daylight and during the hours of darkness when the turbines are illuminated. In view of the conclusions of the	A screening exercise has been undertaken which addresses the impact of the offshore infrastructure on the significance of coastal heritage assets (see Appendix 24.8), the results of which inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).

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		PEI LVIA Chapter 29 - that the impacts upon the AONB will be significant - it is surprising that the project can have progressed this far without due regard being paid to this key area of environmental impact. Clarification is therefore required regarding the potential impacts upon the setting of heritage assets.	
SPS	20/03/2019 Section 42 Consultation Response	Having considered the PEI heritage assessment we affirm our position that the final list of heritage assets identified for further assessment is inadequate and limits the assessment of onshore assets to a meagre 6 listed buildings: Friston Church, Little Moor Farm, High House Farm, Woodside Farm, Friston House and Aldringham Court. The ETG gave thorough feedback on other assets that must form part of the assessment and we welcome SPR's confirmation that The Post Mill and the Friston War Memorial will now be included in the ES heritage assessment. However, we object to principle of the final selection of substation site before undertaking a detailed assessment of the effects on the significance of the heritage assets.	The settings assessment has been progressed to include those assets recommended by the ETG for inclusion within the settings assessment (see Appendix 24.7). The results of the assessment inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).
SPS	20/03/2019 Section 42 Consultation Response	As also discussed during the recent meeting with SPR, post publication of the PEIR, SPS wishes to reaffirm that multiple viewpoints from Grove Road across the landscape toward Little Moor Farm and High House Farm and looking south on the PROW toward the church must be included within the heritage assessment. These are key viewpoints across an historic rural landscape that in all probability has remained substantially unchanged for centuries, and will be obliterated if the substation goes ahead. Visualisations from these viewpoints are essential to correctly record and illustrate the impact on the setting of those heritage assets.	The settings assessment has been progressed to include those viewpoints recommended by the ETG for inclusion within the settings assessment (see Appendix 24.7). The results of the assessment inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).
SPS	20/03/2019	The impact of the 16m wide tree loss associated with the cabling at Aldringham Court will result in permanent harm	The settings assessment has been progressed since the submission of the

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	Section 42 Consultation Response	to the setting of this asset. Despite raising this from a very early stage the assessment of the proposed works on the setting of the asset is still outstanding. In the absence of this crucial piece of work to determine heritage harm it is not possible to consider how those impacts can be mitigated.	PEIR (see Appendix 24.7), the results of which inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).
SPS	20/03/2019 Section 42 Consultation Response	It is also noted that the heritage assessment has excluded consideration of any potential impacts from the proposed offsite highway modifications. Without further information, it is not possible to assess the extent of any impacts, but a number of listed buildings may be affected at both the A12 River Ore bridge strengthening and the Farnham junction improvements. Clarification of the impacts is required and therefore these should be included in the final heritage assessment study.	Offsite highway works are temporary mitigation measures to facilitate the construction of the proposed East Anglia ONE North project. Consideration of this does not form part of the heritage assessment work.
SPS	20/03/2019 Section 42 Consultation Response	The site is a medieval landscape that, with the exception of the transmission line inserted in the late 20th century, retains much of its historic rural character. Map regression shows that the original common land known as Friston Moor included a number of 17th century farmhouses, and the parish church. All are still present, designated as heritage assets, and all continue to derive significance from their setting within the landscape. In particular, the parish church dominates the views across the landscape having clear intervisibility with the farmsteads. The gently rolling landscape is an intimate one, characterised by a series of footpaths that connect the people to its church and has done so for at least 8 centuries. Archaeological evidence confirms the medieval origins of the settlement with evidence of a deserted parish church to the north of St Mary's and a moated site at Little Moor Farm on the edge of Friston Moor. Friston is a classic example of a tiny,	Details of the existing environment are provided in the ADBA (Appendix 24.3), the heritage settings assessment (Appendix 24.7) and where relevant summarised in section 24.5 of this chapter.

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		deeply rural community, which is intrinsically connected to its landscape. It is indeed a special place.	
SPS	20/03/2019 Section 42 Consultation Response	The PEI LVIA shows that the impacts around Aldringham Court will be significant and permanent, including the loss of woodland. The Expert Topic Group has consistently advised that there is high potential for as yet unknown below ground remains, especially at the pinch point where the cable route crosses the B1122. Accordingly, it has been recommended that a systematic earthwork assessment was necessary pre determination so that the mitigation could be incorporated into the scheme at the design stage. The SPS maintains its position that trial trenching pre determination is necessary for those key areas of the scheme previously identified by the Expert Topic Group.	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).
SPS	20/03/2019 Section 42 Consultation Response	The PEI technical summary at para 142 states that a Written Scheme of Investigation will be submitted with the DCO alongside the Environmental Statement. However, the mitigation strategy is reliant upon post consent. The SPS strongly objects to this approach and calls for appropriate levels of trial trenching pre decision. The call for upfront trenching has been rejected by SPR which raises serious concerns, in particular in fixed locations such as Aldringham Court and Friston, where there is little flexibility in the scheme. In addition there is a strong case for detailed archaeological investigation in the vicinity of St Mary's Church where there is significant potential for human remains.	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).
Waveney District Council (WDC)	26/03/2019 Section 42 Consultation Response	SPR has not yet undertaken a setting assessment for the heritage assets on the coastline that would potentially be impacted by the offshore elements of the projects. At a minimum all Grade II* and I listed buildings, the Martello Towers and other historic coastal military infrastructure,	A screening exercise has been undertaken which addresses the impact of the offshore infrastructure on the significance of coastal heritage assets (see Appendix 24.8), the

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		and the coastal conservation areas should be considered in initial scoping work. Without this work, it is not possible to comment on the heritage impacts of this part of the scheme. The need for the setting assessment is amplified by the findings of the SLVIAs.	results of which inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).
Historic England	26/03/2019 Section 42 Consultation Response	Historic England's principal concern is the impact of the national grid and onshore substations on the significance of the Church of St. Mary at Friston which is listed grade II*. We are however concerned by the PEI conclusion which states that on the basis of the analysis undertaken to date, it considers the harm would be less than substantial. The daytime visual effects are helpfully illustrated in the visualisations that have been produced to support the PEIR. Having reviewed these, and using our own analysis and professional judgement we consider the development would result in a high degree of residual harm to the setting of the church, and although we accept this would be less than substantial, this would be in our view be severe harm.	The settings assessment has been progressed since the submission of the PEIR and takes account of Historic England's views upon the matter (see Appendix 24.7). The results of the settings assessment inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).
Historic England	26/03/2019 Section 42 Consultation Response	In sum, the visualisations very clearly show the scale of the proposed development both in terms of height and mass and the profound change this would cause to the existing rural landscape. This would be change of a far greater magnitude than that caused by the existing power lines. It would erode the rural landscape setting within which the church is experienced. The substations would compromise and obscure views of the church from the north. While the associated planting would potentially screen much of the substations and would soften their visual appearance, the views of the church would still be obscured. In views looking north from the church the visibility and alien nature of the substations would severely compromise the views from around the church and its rural setting. Again, in time	The settings assessment has been progressed since the submission of the PEIR and takes account of Historic England's views upon the matter (see Appendix 24.7). The results of the settings assessment inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).

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		the planting would soften and screen the view of the much of the development from here but would limit the long views across the open countryside. The development would also greatly impact on key views of the church from the south. There would be some erosion of the views from the village green but most significantly the long view of the nave and tower of the church from south of the village would be severely compromised by the backdrop of the substations. It does not appear this could be mitigated by planting. When taken together we consider this would result in a very high level of harm to the significance of the grade II* building. The harm would be residual and would remain after the construction phase was complete.	
Historic England	26/03/2019 Section 42 Consultation Response	In our previous correspondence we have identified the grade II* post mill which lies on the western side of the village as a building of interest. It dates from the early nineteenth century and was modified some 60 years later. Its form articulates this evolution and the listing description notes it is judged to be one of the finest post mills in the world. It is encircled by the village but as one of the tallest post mills in the country it is visible in places above the houses and potentially in longer views from the surrounding area. The DBA notes that the Zone of Theoretical Visibility predicts there is potential for views of the mill in combination with the substation locations to the south of the mill. It considers this would not adversely affect the contribution that setting makes to significance and proposes no further assessment. It would be helpful if more information in the form of further analysis and photomontages could be provided in relation to this.	The settings assessment has been progressed to include those assets such as the Friston post mill recommended by the ETG for inclusion within the settings assessment (see Appendix 24.7). The results of the assessment inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).
Historic England	26/03/2019	While Historic England's primary concern relates to the operational impacts of the development and the resulting residual harm, we are also concerned that the impacts from the construction phases are likely to cause harm to	Although acknowledged in the settings assessment, it is considered that only changes in setting due to the operation of the proposed East Anglia ONE

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	Section 42 Consultation Response	the significance of the church. The Desk Based Assessment states that due to the temporary nature of the construction works, they would not result in material harm. There does not appear to be a reference to the length of the construction period (which should cover the options of simultaneous and sequential building of both developments). However, given the proximity of the substation site to Friston church, it seems likely that there would be both visual and environmental impacts, for example noise and light, during construction. This would detract from the appreciation of the church in its essentially rural setting. We recommend information is provided on the construction period relating to both scenarios and a full assessment of all the likely impact of this is undertaken. The PEIR also says there is no reason to predict other effects (environmental) would materially affect heritage significance, and we recommend this is reconsidered.	<p>North project would be of sufficient duration to merit detailed assessment so construction and decommissioning impacts have not been assessed (see Appendix 24.7).</p> <p>The settings assessment as detailed in Appendix 24.7 includes consideration of other environmental effects and their impact upon the setting of heritage assets, with specific reference to Chapter 25 Noise and Vibration.</p>
Historic England	26/03/2019 Section 42 Consultation Response	If the developments (EA2 and EA1N) are built sequentially, the duration and therefore the impact would be longer, but is still considered temporary, we do not therefore consider that this has been adequately assessed in relation the impact on the highly graded assets in Friston.	Although acknowledged in the settings assessment, it is considered that only changes in setting due to the operation of the proposed East Anglia ONE North and East Anglia TWO projects would be of sufficient duration to merit detailed assessment so construction and decommissioning impacts have not been assessed (see Appendix 24.7).

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Historic England	26/03/2019 Section 42 Consultation Response	As discussed above, and in previous discussions, we also have concerns about the impact of the planting itself on the setting and significance of the church. Although extensive woodland and tree planting belts exist in the landscape to the north and northeast of Friston, the landscape which forms the immediate setting of the church is much more open and contributes to the distinctive context of the church. Undertaking extensive planting by way of mitigation does have the potential to screen a harmful development but it also has the potential to bring considerable change to the historic landscape in its own right, through the use of dense planting in an area or view that is characterised by open countryside and long range views. Planting therefore has the potential to contribute to the cumulative impact and has a residual effect.	<p>The results of the settings assessment are provided in Appendices 24.7 and inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).</p> <p>The Outline Landscape and Ecological Mitigation Strategy (OLEMS), secured under the requirements of the draft DCO and submitted with this DCO application, has been developed to take into consideration historic landscape and re-establishing historic field boundaries. In areas to the immediate north of Friston, the re-establishment of historic field boundaries, filling gaps in existing hedgerows and introducing field boundary trees has been proposed to provide layered screening, rather than large-scale woodland planting close to the village. This allows the 'setting' of Friston to be retained (rather than being contained by woodland). Reinstatement of hedges with substantial gaps and new field trees are proposed to north of Friston. These proposals focus on the re-establishment of historic field boundary hedgerows / tree lines; as well as tree blocks set back from farm houses (e.g. Covert woods).</p> <p>In the area to the north of the onshore substation and National Grid substation, the OLEMS has proposed</p>

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			<p>the establishment of larger woodland blocks akin to the existing pattern of woodland blocks within the wider landscape.</p> <p>In relation to individual farmsteads (e.g. listed buildings), the OLEMS has proposed planting not to enclose the historic farms in woodland, as this is not how they would have been experienced in the past. The re-establishment of historically mapped tree-lined enclosures close to the farms has been proposed, to retain farms in an open farmed landscape, whilst achieving screening through multiple lines of planting.</p>
Historic England	26/03/2019 Section 42 Consultation Response	<p>We note that you have provided an 'Indicative Landscape Mitigation Plan' see PEI Fig 29.11 and we are specifically interested in understanding the impact of the planting to the south of the substation site which is closest to the church and village of Friston. Further information is required in the ES about the contribution this landscape makes to the setting and significance of the church, and the impact of the mitigation, including bunds, planting and other measures would have upon it, particularly the heavy screening to the south and nearest to the church (e.g. Figure: 29.14c & e: Viewpoint 2: Friston, Church Road). We also note there are similar issues and concerns in relation to the Grade II listed building to the north of the sub-station site.</p>	<p>The results of the settings assessment are provided in Appendices 24.7 and 24.8 and inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).</p> <p>The OLEMS secured under the requirements of the draft DCO and submitted with this DCO application, and the text in rows above provides further detail.</p>

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Historic England	26/03/2019 Section 42 Consultation Response	As previously discussed we also have concerns about the impact of the proposal upon the setting and significance of the grade II listed Aldringham Court (formerly known as Raidsend). We are pleased you have recognised that this development would bring permanent change to the significance of Aldringham Court through a development within its setting, as noted in the ADBA (PEI Appendix 24.1). Likewise, we agree that the changes are likely to diminish the contribution that setting makes to the heritage significance of the house and consider this would result in a high degree of harm. We also agree that this and any proposed mitigation merits further consideration and analysis in the full ES. We note this garden area of the house represents the only significant area of tree felling as noted in the Summary of Significant Effects – Construction (PEI Figures 29.12a and b).	<p>The results of the settings assessment are provided in Appendix 24.7 and inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).</p> <p>The woodland area to the south of Aldringham Court (Raidsend), a Grade II Listed Building, is considered within Appendix 24.7. The onshore development area has been refined to maintain a woodland buffer between Raidsend and the onshore development area; embedded mitigation reduces the onshore cable width to 16.1m at this location, in order to reduce woodland loss; and replanting is to be considered as a feasible option.</p>
Historic England	26/03/2019 Section 42 Consultation Response	The PEIR uses a matrix approach. The consultation response, Table 24.1, notes that we have raised this as a concern and although it will be used as a standard EIA approach, the cultural heritage chapter and appendices will be underpinned by professional judgement and narrative. While we welcome this approach, the matrices assessment still seems too confusing. These use the term 'perceived heritage importance' which is described as being associated with or to heritage significance. We do not recognise or use the term 'perceived heritage importance', and consider it would be more straightforward to simply use the term heritage significance, which is more widely understood. We strongly recommend this term is removed from the full ES to avoid further confusing the assessment.	The impact assessment methodology as presented in this chapter (see section 24.4.3) has been updated since the submission of the PEIR to ensure consistency with regard to the assessment and supporting documentation, particularly with regards to Appendices 24.3, 24.7 and 24.8 .

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Historic England	26/03/2019 Section 42 Consultation Response	The heritage importance definitions are also not consistent in the PEIR and the DBA and as the latter informs the former this does not seem helpful. For example, in Table 24.8 assets of high perceived international/national importance include GI II* and II buildings and conservation areas with buildings of high heritage significance (it does not refer to other conservation areas although almost every conservation area will contain a listed building). In the DBA the criteria for assessing the importance of heritage assets, Table 1, classes conservation areas and grade II buildings as being of medium importance. This is a contradictory and the text needs to be amended in the ES.	The impact assessment methodology as presented in this chapter (see section 24.4.3) has been updated since the submission of the PEIR to ensure consistency with regards to assessment within this chapter and supporting documentation, particularly with regards to Appendices 24.3 and 24.7 .
Historic England	26/03/2019 Section 42 Consultation Response	We note that the below ground archaeological remains have not as yet been fully evaluated through non-intrusive or intrusive evaluation approaches, and so all interpretations should be regarded as preliminary until the outstanding survey work has been completed.	Noted.
Historic England	26/03/2019 Section 42 Consultation Response	We are pleased to see that the assessment methodologies used onshore and offshore have been correlated in order to ensure an integrated and coherent account of the historic environment and the degree to which the project may impact on this resource.	Noted.
Historic England	26/03/2019 Section 42 Consultation Response	We are pleased to see that the main mitigation approach used will be avoidance, micro-siting and route refinement. The detailed design of the onshore elements will be informed by evidence such as the archaeological assessment of the geophysical surveys.	Noted.
Historic England	26/03/2019 Section 42 Consultation Response	We are pleased to see a joined-up approach being implemented and that the archaeological considerations are at the heart of the design process. We also considered there is a possibility of locating archaeological sites of equivalent value to a scheduled monument (as set out in	Noted.

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		policy under footnote 63 of the National Planning and Policy Framework). In this landscape, we would be particularly interested in understanding more about the prehistoric settlement and distribution of burial mounds, as these, particularly upstanding barrows are the dominant surviving designated archaeological features in the vicinity of the development.	
Historic England	26/03/2019 Section 42 Consultation Response	As part of the Scoping Response (8/12/17), Historic England recommended that the most appropriate geophysical techniques should be utilised, which in some cases may result in more than one technique being applied. We are therefore pleased to see that although magnetometry is being employed as standard across all of the proposed development areas, alternative techniques may be considered at a later stage.	Noted.
Historic England	26/03/2019 Section 42 Consultation Response	It is stated that the mitigation will likely include a combination of approaches (preservation in situ options, open-area excavation, strip, map and record excavation, watching briefs etc.) but it would also be useful for the outline WSI to be as detailed as possible in terms of the sort of approaches that may be used and the remains that will be evaluated/assessed. We are pleased to see that the preferred option for mitigation is preservation in situ and/or avoidance.	The OWSI has been submitted as part of the DCO application, secured under the requirements of the draft DCO (Document Reference: 3.1).
Historic England	26/03/2019 Section 42 Consultation Response	As discussed at the ETG meetings we are aware that the cable corridor would involve significant impacts upon a number of non-designated sites. We recognise SPR have provided large scale geophysical survey and that this has in turn provided a great deal of new information in relation to the range of non-designated archaeological assets. We remain concerned however that no evaluation will be undertaken to ground truth any of these new sites, or the previously known HER records. Given our experience of	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).

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		development along the Suffolk coast and the extraordinary archaeological and evidential value that has been identified in other projects we need to raise the issue of risk. Likewise given our experience of the Bawdsey cable landing site we recommend thought be given to further evaluation of the landing site, to ensure that the archaeological evidence can be characterised. This will help inform decision making in terms of the timing and resourcing during the construction phase.	
Historic England	26/03/2019 Section 42 Consultation Response	It is good to see that a reporting protocol will be developed for areas where intrusive works will be carried out without an archaeologist present, and that it will follow the protocols and procedures outlines in the Offshore Windfarms Archaeological Protocol document and ORPAD.	Noted.
Historic England	26/03/2019 Section 42 Consultation Response	It is noted that the onshore geophysics survey is ongoing and that only preliminary information is available at present. Despite this, it can be concluded that the survey work is producing useful information both to guide the iterative design process and to provide information about buried archaeology present within the development area.	Noted.
Historic England	26/03/2019 Section 42 Consultation Response	We are pleased to see that there is an awareness about the gaps that currently exist in the baseline evidence, and that the potential for below ground remains are based on the potential as indicated by available data. The conclusions may change as new data becomes available and will be updated when necessary.	Noted.
Historic England	26/03/2019 Section 42 Consultation Response	We agree that there is the potential for the non-designated heritage assets to suffer from both direct and indirect impacts as a result of the proposed development, but as the remains have not yet been fully evaluated the full extent of any impacts cannot be determined in detail.	Noted. This is acknowledged in section 24.5.3.2.1.1 of this chapter.

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		Despite this, the archaeological potential of the onshore development area has been classed as being 'medium' at this stage, but this may change as the evaluation stages are completed.	
Historic England	26/03/2019 Section 42 Consultation Response	PEI Table 24.12 provides a summary of archaeological areas identified in the interim geophysical survey report, which has highlighted the potential for several complex sites. One of the sites may include the remains of a post-medieval windmill. If wooden remains are present within this structure, then the potential for dendrochronology to date the remains should be considered.	Noted. This is included within the OWSI which accompanies the DCO application, secured under of the requirements of the draft DCO (Document Reference: 3.1).
Historic England	26/03/2019 Section 42 Consultation Response	We are pleased to see that the limitations within the walkover survey data caused by access restrictions are considered, and that the potential for additional features to survive is recognised on top of the ones discussed within the PEI report.	Noted. Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).
Historic England	26/03/2019 Section 42 Consultation Response	We agree that the areas of archaeological potential should be considered in terms of the worst case scenario when developing appropriate mitigation strategies at this stage due to the fact that the evaluation process has not been completed and because it can be modified/updated as more information becomes available. For example, the potential for human remains to be associated with the former chapel site at Buxton should be considered and should be evaluated carefully and/or avoided. We are also pleased to see that the archaeological importance of deposits of palaeoenvironmental and geoarchaeological potential are also included in the discussion, and that they have been classified as being of high potential as a worst case scenario at this stage.	Noted. The former chapel site at Buxton (KND 009 and HA 6) has been subject to geophysical survey and will also be targeted in the post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).

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Historic England	26/03/2019 Section 42 Consultation Response	PEI Section 24.6.1.5 discusses the potential impact that the bentonite drilling fluid used in HDD may have on buried archaeology. We are pleased to see that a strategy has been developed to mitigate the risks of bentonite slurry outbreak to ensure that fluid pressures are monitored and an action plan developed so that any breakout will be handled quickly and efficiently. Historic England would like to see the action plan to ensure that the buried archaeology will be managed appropriately in relation to the potential impact upon the historic environment.	Noted. An 'action plan' (approach) can be provided to Historic England in advance of construction works as part of the final Code of Construction Practice (CoCP), produced post-consent to discharge the requirements of the draft DCO. This will also be included within the OWSI, submitted with this DCO application, with appropriate cross reference made.
Historic England	26/03/2019 Section 42 Consultation Response	All impacts and archaeological mitigation also needs to be captured in the terrestrial WSI, which would also need to ensure there is adequate overlap with the marine WSI in relation to the intertidal area. The applicant also needs to ensure the wording of DCO captures all works particularly if these works would lie outside of the main construction phases, or in the event that these are considered to be preliminary matters.	Noted. The OWSI, which accompanies this DCO application (Document Reference: 3.1), has been prepared in a manner which acknowledges this comment.
Historic England	26/03/2019 Section 42 Consultation Response	We note the SLVIA chapters and the viewpoints provided in the associated appendices. The primary concern for Historic England is the cumulative impact of the two wind farms (EA2 and EA1N) in association with other windfarms on a number of key coastal designated heritage assets. We note that visualisations and photomontages have been provided which helpfully illustrate a number of these locations, and it is clear there will be some visibility from a number of these assets. The impact will clearly need to be assessed and set out in the ES in relation with reference to the photomontages.	A screening exercise has been undertaken which addresses the impact of the offshore infrastructure on the significance of coastal heritage assets (see Appendix 24.8), the results of which inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).
Historic England	26/03/2019	PEI Section 28.2.1 'SCT 03: Nearshore Waters' within EA2 and EA1N Offshore Windfarm - Appendix 28.2 'Seascape Assessment' details that onshore, to the north and south of the export cable route landfall a "strategically important	A screening exercise has been undertaken which addresses the impact of the offshore infrastructure on the significance of coastal heritage

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	Section 42 Consultation Response	coastline with numerous fortifications still visible including Napoleonic and Second World War structures and Cold War military establishments” is represented. As such, this (past) strategic importance also connects to the offshore seascape, and to the known and as yet unrecorded heritage assets that lie on the seabed within and close to the proposed development area. Principally those associated with military actions from the First and Second World Wars.	assets (see Appendix 24.8), the results of which inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter). Other aspects here are considered within and addressed under the Marine Archaeology and Cultural Heritage Chapter (see Chapter 16 Marine Archaeology and Cultural Heritage).
Historic England	26/03/2019 Section 42 Consultation Response	An example of this is the Chain Home Extra Low radar stations, sometimes referred to as ‘K’ stations, which operated as a defensive network for identifying advancing enemy ships, boats and aircraft approaching the East Coast War Channels and wider area, as well as land-based strategic targets. Therefore, it is worth considering these relationships in further detail. For instance, Orford Castle (known as K138 - which was equipped with ‘surface watching’ capability during the Second World War) has a visible and perceivable link to the coastal and offshore seascape, and seabed heritage assets, in the vicinity of where the offshore renewable energy infrastructure is planned. And it could also therefore be inferred that change - through the placement of a series of linear wind turbines, adjacent to the current coastline – acts as a helpful physical reminder to us all as to significant events that occurred during both wars, within the offshore visible seascape.	A screening exercise has been undertaken which addresses the impact of the offshore infrastructure on the significance of coastal heritage assets (see Appendix 24.8), the results of which inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).
Historic England	26/03/2019 Section 42 Consultation Response	PEI Chapter 24 Section 2.4 (pp 5) states that Environment Agency LIDAR data at 2m resolution was interrogated as part of the DBA. It should be noted that the Historic England guidance document ‘Using Airborne Lidar in Archaeological Survey: the Light Fantastic (2018, p28) states that 2m resolution data are generally inadequate for	The Light Detection and Ranging (LiDAR) data assessment undertaken as part of the desk based assessment (DBA) (Appendix 24.3), used data (made available online) from the Environment Agency, and was

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		recording many archaeological features; 1m resolution is the basic minimum.	undertaken to more broadly characterise the area with regards to currently unrecorded archaeological and cultural heritage remains. This assessment was further supplemented by walkover surveys to support this assessment and will be further informed by a post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).
SCC/SCDC	27/03/2019 Section 42 Consultation Response	The development of the substation site will permanently change the character of the landscape and have significant visual effects with the setting of the village and the relationship between the historic buildings and their farmland setting permanently changed.	The results of the settings assessment are provided in Appendices 24.3 and 24.7 and inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).
SCC/SCDC	27/03/2019 Section 42 Consultation Response	We register concerns about impact on the Grade II listed building at Aldringham Court and its landscape setting from the cable route.	The results of the settings assessment are provided in Appendices 24.3 and 24.7 and inform this this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).
SCC/SCDC	27/03/2019 Section 42 Consultation Response	We seek further information regarding archaeological surveys and results.	Existing survey and assessment results are included in Appendices 24.3, 24.4 and 24.7 and inform this chapter (see sections 24.5 and 24.6). Reference to further forthcoming investigatory works is included in sections 24.3.3 and 24.4.2 of this chapter, with the agreed scope of works outlined in the OWSI submitted with this DCO application. Although such investigatory works will not be

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			completed in time for their results to inform and be incorporated within this chapter, it has been agreed with the HSG that the results works will at the earliest opportunity, inform the post consent mitigation strategy in relation to the archaeological and cultural heritage resource.
SCC/SCDC	27/03/2019 Section 42 Consultation Response	We seek further information regarding Impact of projects on heritage assets including assessment of coastal heritage assets.	The impact assessment is provided in sections 24.6 and 24.7 of this chapter. A screening exercise has been undertaken which addresses the impact of the offshore infrastructure on the significance of coastal heritage assets (see Appendix 24.8), the results of which inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).
SCC/SCDC	27/03/2019 Section 42 Consultation Response	SPR has not undertaken a setting assessment for the heritage assets on the coastline that would potentially be impacted by the offshore elements of either proposal. At a minimum, all Grade II* and I listed buildings, the Martello Towers and other historic coastal military infrastructure, and the coastal conservation areas should be considered in initial scoping work. Without this work, it is not possible to comment on the heritage impacts of this part of the schemes. The need for the setting assessment is amplified by the findings of the SLVIAs.	A screening exercise has been undertaken which addresses the impact of the offshore infrastructure on the significance of coastal heritage assets (see Appendix 24.8), the results of which inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).
SCC/SCDC	27/03/2019 Section 42 Consultation Response	A systematic earthwork survey is required across the landing area, where military remains and other earthwork features have been identified in the Desk Based Assessment (DBA). This is a priority piece of assessment work, which should be undertaken pre-consent, as it will be	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).

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		crucial to informing mitigation strategies, which are likely to influence scheme design in this section of the cable route, as preservation in situ may be appropriate for these features. The PEIRs do not currently commit to undertaking this work pre-DCO. Significance may vary for different elements of the remains, and this has not been assessed. Many military features are of high local/regional importance, given the important role that Suffolk played in coastal defence, with significance increased through survival as upstanding remains. We advise preservation in situ/avoidance as best practice; therefore, full pre-consent assessment is needed.	
SCC/SCDC	27/03/2019 Section 42 Consultation Response	The landfall site should be included in pre-DCO trial trenched evaluation given it is a critical element to the projects with limited flexibility in design and also a time critical part of the schemes. We would cite the extremely challenging issues faced on the Bawdsey East Anglia One (EA1) site as a key reason why early evaluation would be beneficial for SPR here.	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).
SCC/SCDC	27/03/2019 Section 42 Consultation Response	Aldringham Court and its grounds were designed by local architect Cecil Lay. The historic and architectural interest that comes from this association with a well-known local architect contributes to the significance of the asset. The impact on the setting of Aldringham Court relates to the removal of trees along the cable route. This would require the cutting and maintenance of a 16.1m wide swathe for one project or 27.1m swathe for both projects through the grounds to the south of the house. Woodland cannot be replanted above the cables. The grounds are part of Lay's original design and therefore this designed garden setting is important to the understanding of the significance of the building. The loss of part of the original design would therefore fundamentally alter this setting as part of the	The results of the settings assessment are provided in Appendix 24.7 and inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter). The woodland area to the south of Aldringham Court (Raidsend), a Grade II Listed Building, is considered within Appendix 24.7 . The onshore development area has been refined to maintain a woodland buffer between Raidsend and the onshore development area; embedded mitigation reduces the onshore cable

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		original design would be lost resulting in harm to the significance of the listed building.	width to 16.1m at this location, in order to reduce woodland loss; and replanting is to be considered as a feasible option.
SCC/SCDC	27/03/2019 Section 42 Consultation Response	SPR has not yet refined the cable corridor to illustrate the positioning of the cable swathe for one or two projects through the woodland. Figure 26.7 in the PEIR identifies the intention to provide a new temporary construction access point off Aldeburgh Road to allow access to the haul road heading west. In appendix 26.14 to the PEIR the position of the access is illustrated in close proximity to the listed building. It is therefore assumed that the cable swathe would be in a similar position. This positioning so close to the listed building is of significant concern to the Councils.	As above, the results of the settings assessment are provided in Appendices 24.7 and inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter). The woodland area to the south of Aldringham Court (Raidsend), a Grade II Listed Building, is considered within Appendix 24.7 . The onshore development area has been refined to maintain a woodland buffer between Raidsend and the onshore development area; embedded mitigation reduces the onshore cable width to 16.1m at this location, in order to reduce woodland loss; and replanting is to be considered as a feasible option.
SCC/SCDC	27/03/2019 Section 42 Consultation Response	There is very limited scope to mitigate this harm to the setting of Aldringham Court caused by the cable corridor and permanent removal of woodland however this harm could be lessened to a degree by the retention of a section of woodland immediately to the south of the building.	As above, the results of the settings assessment are provided in Appendices 24.7 and inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter). The woodland area to the south of Aldringham Court (Raidsend), a Grade II Listed Building, is considered within Appendix 24.7 . The onshore development area has been refined to maintain a woodland buffer between

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			Raidsend and the onshore development area; embedded mitigation reduces the onshore cable width to 16.1m at this location, in order to reduce woodland loss; and replanting is to be considered as a feasible option.
SCC/SCDC	27/03/2019 Section 42 Consultation Response	The Councils are pleased that a geophysical survey has been undertaken, although there are a number of key land parcels which have not yet been able to be surveyed (including additional areas now included in the onshore site area). This work should be undertaken as a priority at the earliest opportunity, before submission of the DCOs, given that they include high archaeological potential areas, in key sections of the cable corridor which have limited flexibility.	The acquisition and archaeological assessment of geophysical survey data continued following the submission of the PEIR, the results of which are detailed in Appendix 24.4 . Further geophysical survey work is anticipated in areas where access was not previously possible, the results of which will be available for review. The results of these survey works will ultimately serve to inform and contribute to the development of post consent mitigation strategies in relation to the archaeological and cultural heritage resource.
SCC/SCDC	27/03/2019 Section 42 Consultation Response	A full systematic earthwork survey for all areas where earthworks have been identified within the onshore site area is still required, before submission of the DCOs. The PEIR does not however commit to undertaking this work.	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).
SCC/SCDC	27/03/2019 Section 42 Consultation Response	The Councils have previously advised that all elements of the scheme should be subject to trial trenching and this remains their advice, notwithstanding this as a minimum, key areas of the project with limited flexibility for re-design to allow preservation in situ should be evaluated (using a combination of trial trenching and metal detecting) prior to	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).

Consultee(s)	Date / Document	Comment	Response / where addressed in the ES
		<p>the DCO submissions. Also, any sites identified in the DBA or geophysical survey which have the potential to be of high significance or are unable to be avoided by design, should be included in the trial trenched evaluation. A number of the anomalies identified during geophysical survey which are likely to be archaeological in nature are situated in key areas of the projects where flexibility is limited or are of a scale that they cannot be avoided. Therefore, understanding the nature and significance of these remains through trial trenching is essential before planning decisions can be made. The Environmental Statement (ES) should set out the approach to any outstanding archaeological evaluation which is required, alongside mitigation.</p>	
SCC/SCDC	27/03/2019 Section 42 Consultation Response	<p>We would again highlight the severe risk to extremely tight project timetables by leaving all evaluation until post consent which means that archaeological mitigation requirements will not be able to be defined until this point. Delays are possible if extensive areas requiring archaeological mitigation are defined. SPR has committed to a 'lessons learnt' approach following the EA1 project, but in respect of the importance of thorough, early evaluation to inform project design and programming and also to best protect heritage, this does not appear to have occurred.</p>	<p>Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).</p>
SCC/SCDC	27/03/2019 Section 42 Consultation Response	<p>The Councils understand that there is a tight timescale for the DCO submissions, however, there is sufficient time for trial trenched evaluation to be undertaken. We would not object to further evaluation being completed during the DCOs preparation periods; even if that means that the individual DCO documentation cannot include the results of this work, as this would still ensure that we have sufficient information for the examinations.</p>	<p>Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).</p>

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SCC/SCDC	27/03/2019 Section 42 Consultation Response	The Councils do not agree with SPRs claims that these projects will not have any cumulative archaeological impacts with other projects. Cumulatively, there will be landscape scale impacts to below ground archaeological remains as a result of multiple, large projects within this part of the County e.g. Sizewell C new nuclear power station proposals. We would also highlight that EDF Energy is undertaking full up-front evaluation for all scheme elements associated with Sizewell C and so the pre-DCO work which has been requested for this project is consistent with requirements for another NSIPs located in close proximity.	Cumulative impacts are addressed in section 24.7 of this chapter and Appendix 24.2 .
SCC/SCDC	27/03/2019 Section 42 Consultation Response	In relation to the cable corridor, a systematic earthwork survey is required for the area south-east of Half Way Cottages where known military remains are recorded and have been identified in the DBA. This is a priority piece of assessment work, which should be undertaken pre-consent, as it will be crucial to inform mitigation strategies, which are likely to influence scheme design in this section of the cable route, as preservation in situ may be appropriate for these features. The PEI does not currently commit to undertaking this work pre-DCO which the Councils are concerned about. Significance may vary for different elements of the remains, and this has not been assessed. Many military features are of high local/regional importance, given the important role that Suffolk played in coastal defence, with significance increased through survival as upstanding remains. We advise preservation in situ/avoidance as best practice; therefore, full pre-consent assessment is needed.	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).
SCC/SCDC	27/03/2019	Although best practice would be for the entire cable route to be subject to pre-DCO trial trenching, the Councils accept that there is flexibility to design around below	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as

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	Section 42 Consultation Response	ground archaeological remains along some sections of the route. Areas which should be included in pre-DCO trial trenched evaluation are: 1. The Aldringham crossing point and adjacent land parcels leading into and away from the crossing; and 2. The section of the route north of Friston which leads into the substation site, as in these areas the maximum working width narrows and extensive geophysical anomalies across the entire width of the cable swathe has been defined, meaning that avoiding all archaeological remains will not be possible. Therefore, evaluation will allow the significance of features already identified, plus any additional surviving below ground remains, to be assessed and therefore impacts to be understood.	outlined in consultation response to SCCAS (dated 08/12/2017).
SCC/SCDC	27/03/2019 Section 42 Consultation Response	Any prehistoric funerary monuments which are defined along the cable route, especially if forming part of cemetery associated with upstanding Scheduled monuments surviving on Aldringham Green and Aldringham Common have the potential to be considered as nationally significant.	Noted.
SCC/SCDC	27/03/2019 Section 42 Consultation Response	As trenching rather than direct drilling is proposed into the Hundred River valley, there is high potential for complex deposits to survive in flood zone areas, including paleoenvironmental evidence and waterlogged archaeological deposits. Early assessment of this area is strongly advised, although the Councils note the challenges posed by trees in this section of the route.	A targeted programme of archaeological watching brief / geoarchaeological monitoring of engineering-led GI works is to be undertaken post consent in line with Engineering-led GI works (see section 24.4.2 of this chapter). Works will be subject to a survey-specific WSI to be agreed with the HSG in advance.
SCC/SCDC	27/03/2019	The assessment that has been undertaken so far has covered Step 1 of Historic England's guidance and has mostly addressed Step 2, which require the identification of the heritage assets and their settings which are affected	The setting assessment has been progressed since the submission of the PEIR to address Steps 1-5 of Historic England's guidance. The results of the

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	Section 42 Consultation Response	and an assessment of the degree in which the settings and views make a contribution to the significance of the asset. SPR has not yet fully addressed Step 3 (the effects of the proposed development on the significance or on the ability to appreciate it) or beyond this stage. While it is recognised that the preferred layout is not yet fixed, there are firm ideas about the footprints and maximum heights involved at the site of the substations. It would therefore be possible to make an assessment of harm based on the worst case scenario which would allow a more detailed discussion about mitigation to be had at an earlier stage. Without a full assessment of harm there is a limit to the comments the Councils can provide.	settings assessment are provided in Appendix 24.7 and inform this this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter). The impact of offshore infrastructure on the significance of coastal heritage assets has been addressed as part of a screening exercise (see the OWSI submitted with this DCO application).
SCC/SCDC	27/03/2019 Section 42 Consultation Response	The impacts arising during construction/decommissioning would be temporary and of sufficient short duration that they would be unlikely to give rise to material harm to above ground heritage assets. The harmful impacts would primarily occur during the operational phases and these impacts would be very long term if not permanent.	Noted.
SCC/SCDC	27/03/2019 Section 42 Consultation Response	While a full assessment of the level of harm has not been provided by SPR, the Councils have significant concerns about the harm the project will cause to a number of listed buildings which sit in close proximity to the onshore substation development area. More detailed comments in relation to the individual buildings have been provided within Appendix B. It is our view that the projects are likely to result in harm to Church of St Mary, Little Moor Farm, Woodside Farmhouse, High House Farm and Friston House. More detailed comments will be able to be provided once the impact assessment is completed and made available.	The results of the settings assessment are provided in Appendix 24.7 and inform this chapter where relevant (see sections 24.4, 24.5 and 24.6 of this chapter).
SCC/SCDC	27/03/2019	The Councils are of the view the substation site, including all associated construction and infrastructure areas, should	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as

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	Section 42 Consultation Response	be the subject of trial trenching and metal detecting pre-consent, given flexibility in the design is likely to be limited. Archaeological site KND 009 (a probable medieval chapel site, with a high potential for human remains) remains in the red line boundary for the substation area. This site could be of national significance and therefore early and full archaeological assessment is essential if any works are planned on or in the immediate vicinity of this site as part of the schemes. This site has not yet been included within the geophysical survey, full pre-DCO trial trenching and metal detecting is also required if this site is proposed to remain within the red line boundary going forward. The Councils would be concerned about any works in this area if the presence of a chapel site or cemetery is demonstrated. Appendix C includes further detailed comments in relation to archaeology and the different documents contained within the PIER.	outlined in consultation response to SCCAS (dated 08/12/2017).
Expert Topic Group (HSG)	17/04/2019 ETG Meeting Minutes	SCCAS requested that all pre-consent investigation results be made available to SCCAS as soon as available.	Greyscales and interpretations of geophysical survey data obtained to date have been sent to SCCAS.
Expert Topic Group (HSG)	17/04/2019 ETG Meeting Minutes	It was recommended that the landfall should be considered with respect to pre-consent investigatory works such as trial trenching, especially if ongoing engineering decisions at the landfall remove the flexibility	Trial-trenching will not be undertaken at the landfall area. The need to undertake investigatory works in this area as soon as possible post-consent is nonetheless acknowledged.
Expert Topic Group (HSG)	17/04/2019 ETG Meeting Minutes	The ETG agreed with the revised approach to pre-consent archaeological survey/investigation (with the exception of the landfall location).	Noted.
Expert Topic Group (HSG)	17/04/2019 ETG Meeting Minutes	HE requested that contingency (in terms of land take) be kept in for all order limits to avoid spoil stockpiling issues.	Noted.

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Expert Topic Group (HSG)	17/04/2019 ETG Meeting Minutes	The screening exercise will be sent across to the HSG for review and comment, with regards to the extent of scope, methodology and conclusions reached.	The draft offshore settings study (screening study) was disseminated to the HSG on 10/05/2019 for review and comment.
Expert Topic Group (HSG)	17/04/2019 ETG Meeting Minutes	SCCAS advised that KND 009 be included for trial trenching if groundworks are planned at this site, as has the potential to be of national significance and therefore appropriate for preservation in situ, which may affect the nature of works (if any) which are permitted within this site.	The former chapel site at Buxton (KND 009 and HA 6) has been subject to geophysical survey and will also be targeted within the post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017).
Expert Topic Group (HSG)	17/04/2019 ETG Meeting Minutes	Early archaeological assessment should be undertaken as soon as possible at Raidsend (if not pre-DCO then as soon as possible post-consent) to reduce the risk of delays to the project programme given this is a scheme critical area. Enough flexibility must also be left to allow significant archaeological remains to be avoided, if appropriate.	Post-consent survey approach outlined in Table 24.3, section 24.3.3.1 and as outlined in consultation response to SCCAS (dated 08/12/2017). This programme will include trial-trenching at the Aldringham Road area (Hundred River Crossing), but not within the former grounds of Raidsend (Aldringham Court). From a landscape / heritage settings perspective there is a commitment to reduce the onshore cable corridor swathe at this location.