



**SCOTTISHPOWER  
RENEWABLES**

# **East Anglia ONE North and East Anglia TWO Offshore Windfarms**

## **Clarification Note**

### **Archaeology and Cultural Heritage**

Applicants: East Anglia ONE North Limited and East Anglia TWO Limited  
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**Applicable to East Anglia ONE North and East Anglia TWO**



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## Glossary of Acronyms

ADBA	Archaeology and Cultural Heritage Desk Based Assessment
AONB	Area of Outstanding Natural Beauty
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
ESC	East Suffolk Council
ETG	Expert Topic Group
GVLIA3	Guidelines for Landscape and Visual Assessment
HLA	Historic Landscape Area
HLC	Historic Landscape Character
HLCA	Historic Landscape Character Assessment
HER	Historic Environment Record
LCA	Landscape Character Assessment
LCT	Landscape Character Type
LVIA	Landscape and Visual Impact Assessment
NPS	National Policy Statement
OLEMS	Outline Landscape and Ecological Management Strategy
OLMP	Outline Landscape Mitigation Plan
PRoW	Public Rights of Way
RHLA	Rapid Historic Landscape Assessment
SCC	Suffolk County Council
SCCAS	Suffolk County Council Archaeological Service
SoCG	Statement of Common Ground
WSI	Written Scheme of Investigation





## Glossary of Terminology

Applicants	East Anglia TWO Limited / East Anglia ONE North Limited
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 TWO project	The proposed project consisting of up to 75 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.
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order but will be National Grid owned assets.
National Grid overhead line realignment works	Works required to upgrade the existing electricity pylons and overhead lines (including cable sealing end compounds and cable sealing end (with circuit breaker) compound) to transport electricity from the National Grid substation to the national electricity grid.
National Grid overhead line realignment works area	The proposed area for National Grid overhead line realignment works.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO project / 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 TWO / 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 substation	The East Anglia TWO / 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 TWO project / East Anglia ONE North project.



Projects	The East Anglia TWO Offshore Windfarm and the East Anglia ONE North Offshore Windfarm.
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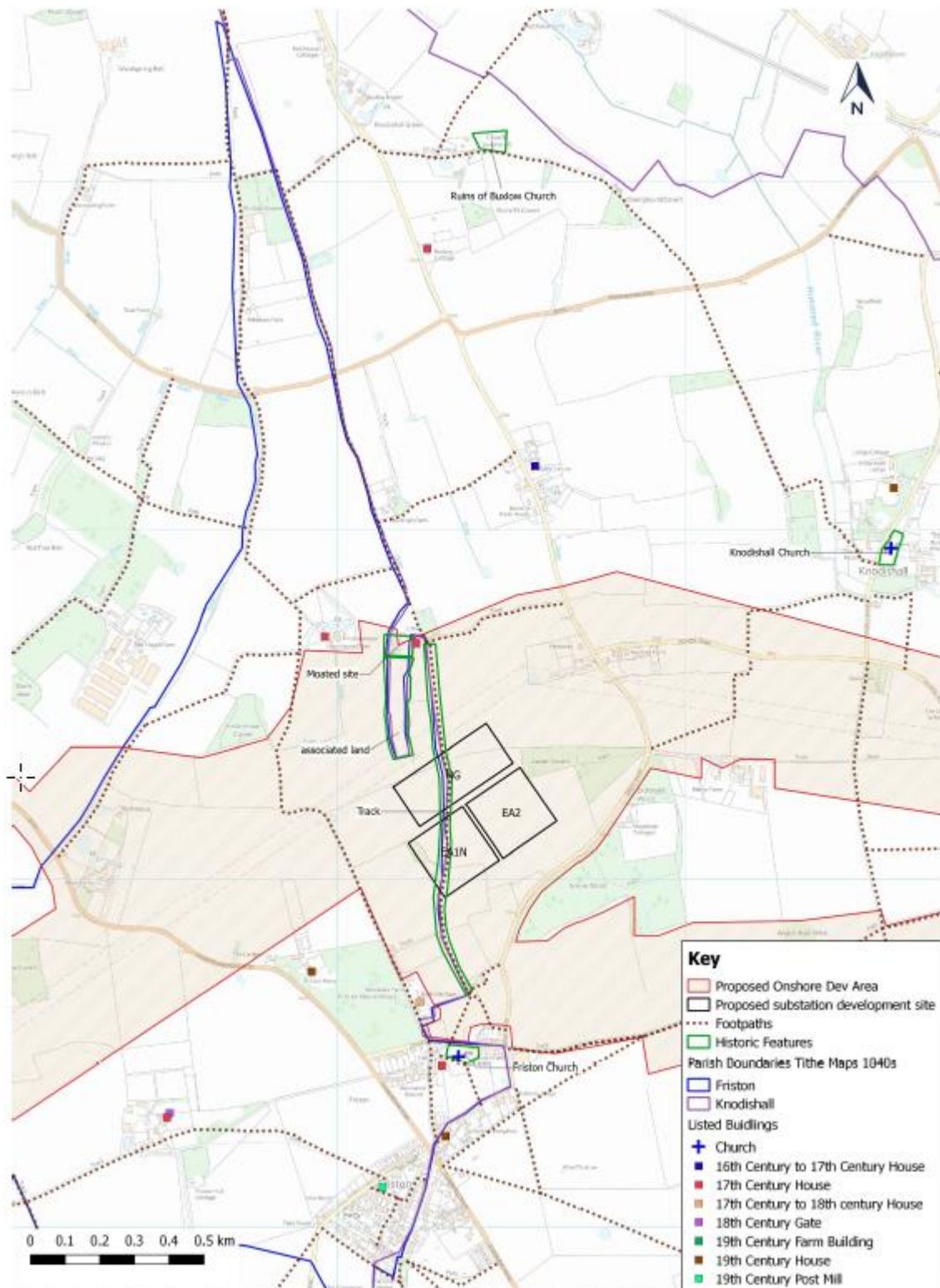
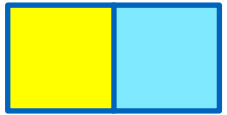


# 1 Introduction

1. This clarification note has been prepared by East Anglia TWO Limited and East Anglia ONE North Limited (the Applicants) to clarify aspects of the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications (the Applications). It relates to archaeology and cultural heritage matters and brings together information presented across several documents submitted as part of the Applications in October 2019, as requested by East Suffolk Council (ESC) and Suffolk County Council (SCC) (the Councils) during the Statement of Common Ground (SoCG) process.
2. This document is applicable to both the East Anglia ONE North and East Anglia TWO Applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23<sup>rd</sup> December 2019 (PD-004). Whilst for completeness of the record this document has been submitted to both Examinations, if it is read for one Project submission there is no need to read it again.

## 1.1 Purpose

3. In preparing the SoCG with the Councils, the Councils queried the Applicants' assessment of potential impacts upon historic landscape character associated with the onshore substations. Specifically, the Councils have asked the Applicants to further consider the historical significance of a trackway which passes directly through the onshore substation and National Grid substation locations (**Plate 1:1**). The Councils' comments are provided in **Table 1.1** below.
4. The trackway is now a regularly used Public Right of Way (ProW) and a section will be lost to construction and operation of the onshore substations and National Grid infrastructure. Additional information on this historic trackway is contained within the Rapid Historic Landscape Assessment (RHLA) (SCC, 2019), which has been provided to the Applicants following submission of the Applications.
5. This clarification note considers the evidence provided within the RHLA (SCC, 2019) with regards to the historic trackway as an Anglo Saxon Hundred boundary and a historic parish boundary. The amenity value of the trackway's historical context is considered and its relationship with the surrounding landscape as an historic landscape feature. This note also signposts to and summarises where the historic trackway has already been assessed in the Applications.



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**Plate 1:1 Annotated map showing the footpath (historic track) and connectivity between historic features (SCC, 2019)**



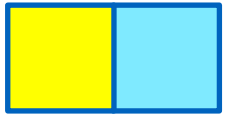
**Table 1.1 Queries from the Councils Regarding the Applicants' Assessment**

Topic	Councils' Comment
Setting of Heritage Assets (Built Heritage)	<i>'From a built heritage perspective, the Councils are of the view that it would be best to address the track [historic trackway] as a feature which contributes to the setting of the Grade II* listed church, contributing to the legibility of the historic landscape and how the church was connected to and experienced from the historic common land to the north of the village. The track also reflects an historic functional relationship between Little Moor Farm and the trackway which links the main village to the later settlement on the edges of Friston Moor. For this reason, the trackway is considered to contribute to the understanding of Little Moor Farm as a green farmstead (Peter Warner (1987) Greens, Commons and Claylands Colonisation). There is also a potential that Little Moor Farm was the site of a parsonage with tracks linking it to the churches, as detailed in the report (pages 18-20).'</i>
Archaeology (Landscape)	<i>'From an archaeological perspective, the track is clearly a Non-Designated Heritage Asset (NDHA) as a route and a feature. The Councils consider the track feature should be included as part of the baseline, which is referenced as missing within report (paragraph 7.2). The track forms part of a long-standing, significant element of the landscape which can be traced beyond the site is a strong point, and the report also notes that nationally we don't have a picture of the survival and form of Hundred boundaries which should also be acknowledged as an additional consideration to existing baseline data. As an historic landscape feature the trackway has significance as:</i>  <i>a) A parish and Hundred boundary</i>  <i>b) As part of a network of features typical of a settled clayland landscape with commons and greens.'</i>
Archaeology (Monument)	<i>'In terms of assessment/impact and mitigation on its physical form as a monument [historic trackway] present within the site, it has what would be assessed as 'evidential value' with potential (once investigated) to see if it has a clearer form, and also for associated activity (e.g. burials at locations on boundaries, including 'deviant' burials.'</i>
Landscape Character	<i>'From a LVIA perspective, Guidelines for Landscape and Visual Assessment (GLVIA3) makes it clear that the relationship between landscape and historic landscape matters is a close one. One complements the other. Landscape history, its historic character, the interaction between people and places through time, and the surviving features and their setting may be relevant to the LVIA baseline, and historic landscape characterisation and current landscape character assessment should both form part of the evaluation. There is an expectation that good use should be made of existing historic landscape information, and this information is currently available for use in this LVIA.</i>  <i>There is an expectation that SPR should incorporate the SCC Friston and Knodishall Historic Landscape Assessment into the baseline for the overall LVIA for the substation and cable corridor development proposals. Without such incorporation, the LVIA cannot be considered complete. The historic landscape features identified could then have implications for the sensitivity identified for the site'.</i>



Topic	Councils' Comment
Access and Amenity	<p><i>'Finally, from a Public Right of Way (PRoW) perspective, the Anglo Saxon Hundred boundary and historic parish boundary is a PRoW which has significant amenity value resulting from its presence and its local, historic and cultural importance as a right of way.</i></p> <p><i>It is clear taking the example of the trackway that in each of the different topic areas this feature would need to be addressed as it pertains to several topic areas and may have more than one dimension within the same topic area. It is considered that a holistic approach should be utilised to addressing the features and topic areas with one document looking at the historic landscape character and features taking into account the interplay between the different disciplines. This approach would clarify for the Examining Authority relationships between the topic areas and allow a clearer understanding of the significance of these features as a whole.</i></p> <p><i>Although conversations are occurring within the various Statements of Common Ground meetings regarding the topic of the historic landscape character it is considered that it would be beneficial to bring these discussions together in one place and address the issue holistically'.</i></p>





## 1.2 Relevant Documents

6. This clarification note addresses the above queries in turn, signposting information from the following relevant Environmental Statement (ES) chapters, and drawing on details from other documents submitted with the Applications as follows:
- ***Chapter 24 Archaeology & Cultural Heritage*** (APP-072);
  - ***Appendix 24.3 Onshore Archaeology and Cultural Heritage Desk Based Assessment and Annexes*** (APP-514);
  - ***Appendix 24.7 Assessment of the Impact of Onshore Infrastructure in the Setting of Heritage Assets*** (APP-519);
  - ***Chapter 29 Landscape and Visual Impact Assessment*** (LVIA) (APP-077)
  - ***Appendix 29.3 Landscape Assessment*** (APP-567); and
  - ***Outline Landscape Mitigation Plan General Arrangement*** (OLMP) (APP-401 – 403).



## 2 Setting of Heritage Assets (Built Heritage)

7. The RHLA (SCC, 2019) draws attention to a track (a PRoW) running north from the Church of St Mary, Friston and passing through the onshore substation location towards Little Moor Farm and Friston Moor. For most of this section, the track coincides with the historic boundary between Friston and Knodishall Parishes, a boundary which also separated the Hundreds of Blything and Plomesgate (**Plate 2:1**).
8. SCC notes that the division of Suffolk into Hundreds for administrative purposes had probably been achieved by the 10th century, so the track running north from Friston may be of considerable antiquity. According to SCC the boundary is not mapped until 1783 (Hodskinson's Map of Suffolk, Figure 16 of the RHLA (SCC, 2019)) and, even then, the precise route taken by the Hundred boundary is difficult to reconcile with modern mapping. Accurate mapping of the boundary and the historic trackway is only achieved with the Tithe maps for Friston and Knodishall Parishes, dating from 1846 (SCC report Figures 10 and 11). Despite this uncertainty about early origins there is no reason to doubt that the track is a long-established route for people travelling between Friston, Friston Moor and other dispersed farmhouses to the north
9. As stated in **Table 1.1**, SCC has suggested that the track forms part of the setting of two Listed Buildings (the Church of St Mary, Friston, and Little Moor Farm) and could make a positive contribution to the significance of these heritage assets. SCC is therefore of the view that the loss of part of the historic trackway during construction and operation of the onshore substations and National Grid infrastructure could harm the significance of these assets.
10. The predicted impact of the Projects on the significance of these assets due to change in their settings has been addressed by the Applicants in **Appendix 24.7 Assessment of the Impact of Onshore Infrastructure in the Setting of Heritage Assets** (APP-519).



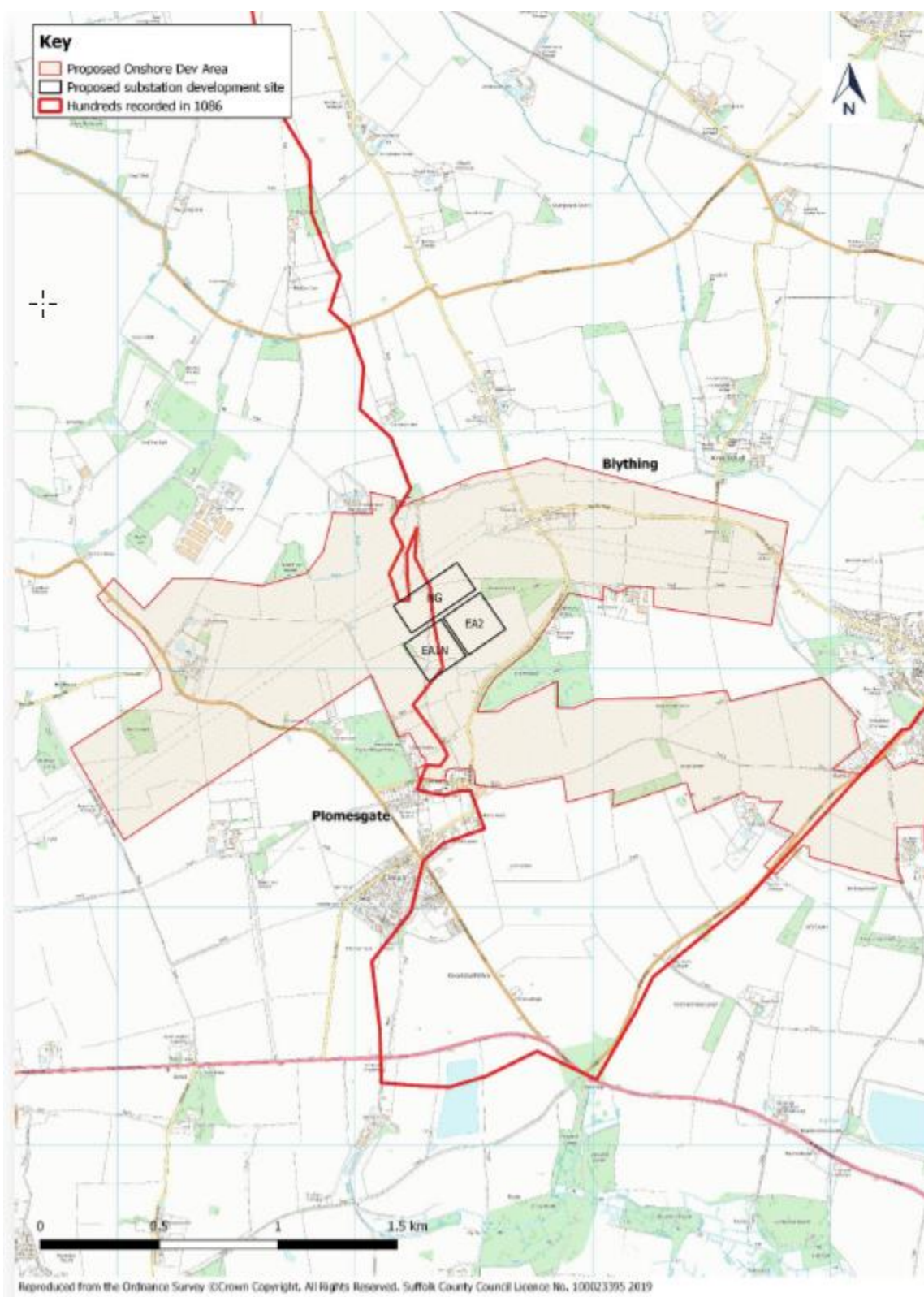


Plate 2:1 Plomesgate and Blything Hundred boundary (SCC, 2019)



11. The significance of the church, including the contribution of setting, is described in **section 4.4** (paragraphs 91-94) of **Appendix 24.7** (APP-519). It is recognised here that the section of historic trackway between the church and Little Moor Farm is one of a number of historic routes leading to the church from different parts of Friston Parish. These routes provide sequential views of the church as you walk towards it and “*allow the church to be appreciated in its historic role as the spiritual and physical focal point of its parish, adding further to historic interest in the asset*”. The Applicants therefore agree that the experience of walking towards the church on the track from Little Moor Farm is part of the positive contribution that setting makes to the significance of the church.
12. The assessment in **Appendix 24.7** (APP-519) goes on to recognise that construction of the onshore substations would block the track and entirely obstruct views towards the church (paragraph 103). This change is illustrated with a photomontage (CH VP4 (Figure 9 of **Appendix 24.7**)). In the assessment of predicted impact on the church (paragraphs 104-109) it is concluded that obstruction of views along the historic trackway from Little Moor Farm is the only circumstance where the significance of the church would be materially diminished by the Projects. The loss of this section of the historic trackway is therefore primarily responsible for the finding of an adverse impact of low magnitude on the significance of the church (paragraphs 109 and 164). Although the planting proposed as part of the **OLMP** proposals (APP-401 – 403) will restore elements of historic landscape character, a residual minor adverse impact would remain (paragraph 166).
13. The significance of Little Moor Farm, including the contribution of setting, is described in paragraphs 41-45 of **Appendix 24.7** (APP-519). In this analysis, the positive contribution made by the setting is considered to derive generally from the fact that this 17th century farmhouse is still experienced in a rural agricultural landscape and, more specifically, from the appreciation of its relationships to other surviving elements of the dispersed early settlement around Friston Moor (paragraphs 43-44).
14. The section of historic trackway between Little Moor Farm and the church does not feature in the analysis of the setting of Little Moor Farm. Having considered the information presented in the RHLA (SCC, 2019) it is concluded that the analysis in **Appendix 24.7** (APP-519) remains valid and does not need to be amended. While it is accepted that anyone living at Little Moor Farm would have used the section of historic trackway that runs southwards to the church, this relationship does not contribute materially to the significance of the farmhouse. It is the church that derives some part of its significance from this relationship, as noted above. The Applicants note the church as a focal point in its parish and the



various radial routes leading to the church allow it to be experienced as an historic landmark.

15. The assessment of predicted impact on Little Moor Farm (paragraphs 52-54) does identify an adverse impact of medium magnitude on significance of the asset due to change in setting but this reflects the proximity of the onshore substations to the farmhouse and the resulting loss of rural agricultural landscape character. The track is part of the portion of landscape that would be lost to the onshore substations, but it is the overall landscape character that is considered to be relevant in this case.



### 3 Archaeology (Landscape)

16. Within **Appendix 24.3** of **Onshore Archaeology and Cultural Heritage Desk Based Assessment and Annexes** (APP-514), which is a primary supporting technical appendix to **Chapter 24 Archaeology and Cultural Heritage** (APP-072), the parish boundary with associated historic trackway at Friston is included under consideration of historic parish boundaries, specific reference 'PB1 eastern edge of Friston and western edge of Knodishall', the route / location being north / south between Clouting's Farm, then Little Moor Farm and Friston village.
17. Within **Table 4** of **Appendix 24.3** (APP-514) 'Historic Parish Boundaries within the Archaeology and Cultural Heritage Desk Based Assessment (ADBA) Study Area' there are six parish boundaries noted, all assigned a medium heritage importance. **Section 4.2** 'Physical effects (Construction Phase)', paragraph 308 notes that PB1 survives as a historic trackway. It is also noted that for the parish boundaries affected in general *"there may need to be localised removal of the hedges along these boundaries resulting in some harm to their significance. However, it may be possible to avoid impacts by selecting less densely vegetated sections for the cable route in conjunction with the project ecologists"*, this being mainly focused on their function as potentially important hedgerows.
18. The above information is also drawn across into **Chapter 24 Archaeology and Cultural Heritage** (APP-072), see paragraph 135 and **Table 24.14**. It is also acknowledged in paragraph 207 that:  
  
*"The onshore substation and National Grid substation location also includes one parish boundary (PB1) (Figure 16 in Appendix 24.3 and Figure 24.3h and Table 24.20). Any hedgerows associated with this boundary would be classed as "Important Hedgerows" and are therefore considered to be heritage assets of medium heritage importance. Prior to mitigation, groundworks have the potential to result in a medium adverse magnitude of impact upon any such hedgerows (where present), resulting in a moderate adverse significance of effect, as a likely WCS"*
19. Paragraph 212 goes onto state that:  
  
*"Impact to the HLC [Historic Landscape Character] (including hedgerows and parish boundaries) will be minimised by returning field boundaries / areas / hedgerows to their preconstruction condition and character post-construction, as part of a sensitive programme of backfilling and reinstatement / landscaping (see section 24.3.3.1). Certain hedgerows and field boundaries (e.g. parish boundaries) may require recording prior to the construction process and enhanced provisions made during backfilling and reinstatement. Further detail*





*regarding hedgerow reinstatement is provided in the Outline Landscape and Ecological Management Strategy (OLEMS), secured under the requirements of the draft DCO and submitted with this DCO application, the final LMP will be produced post-consent and agreed with the relevant regulators”.*

20. It is acknowledged that elements of PB1 will be lost altogether as a result of the onshore substations construction and operational presence in the landscape of the Projects. As no obvious earthworks of the track associated with the parish boundary survive above ground, it is not formally and individually assessed for impacts associated with ‘Direct Impact on (permanent change to) Above Ground Archaeological Remains and Heritage Assets’. PB1 as an important hedgerow with a boundary, and as such the associated track, is considered under wider discussions of landscape screening and planting, and specifically the **OLEMS** (APP-584). The relevance of the **OLEMS** (APP-584) to archaeology and cultural heritage is described in **Table 24.3** of **Chapter 24 Archaeology and Cultural Heritage** (APP-072) ‘Embedded Mitigation and Best Practice for Archaeology and Cultural Heritage’, under Landscape Screening and Planting:

*“The OLEMS 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).*

*In the area to the north of the onshore substation and National Grid substation, the OLEMS has proposed the establishment of larger woodland blocks akin to the existing pattern of woodland blocks within the wider landscape.*

*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.*

*In addition, elsewhere across the onshore development area, wherever possible, field boundaries and hedgerows will be returned to their pre-construction condition and character post-construction. Further detail regarding hedgerow reinstatement is provided in the OLEMS”.*



21. HLC considerations are included within **Chapter 24 Archaeology and Cultural Heritage** (APP-072). Landscape character is addressed more holistically within **Chapter 29 LVIA** (APP-077), and associated appendices, where significant adverse effects on the landscape at the onshore substation location at Friston are already identified and openly acknowledged (see **section 5** of this clarification note for more detail). Within **Chapter 24 Archaeology and Cultural Heritage** (APP-072), reference to HLC is included under **sections 24.4.5, 24.5.4, 24.6.1.2** and **24.6.1.2.2**. It is also specifically acknowledged in paragraph 239 that in the case of the Church of St Mary, Friston (1287864), additional impact on significance is caused by the substations blocking valued views towards the church (of high heritage importance) and the partial loss of a footpath (parish / Hundred boundary and PRoW) along and from which a view of the church can currently be experienced (low magnitude of impact); resulting in a moderate adverse significance of effect. This is more related to heritage setting effects which is covered in **section 2** of this clarification note.
22. Additional narrative on the PRoW / parish and Hundred boundary (PB1), as part of a network of features typical of a settled clayland landscape with commons and greens is covered in some detail in the RHLA (SCC, 2019) and also **section 5** of this clarification note. It is not the intention of this clarification note to replicate and re-state what the RHLA includes. More detailed work has clearly been undertaken by the Councils on the PRoW / parish and Hundred boundary (PB1).
23. The RHLA (SCC, 2019) provides some interesting further insight, albeit including a certain amount of supposition and conjecture, about the track and footpath as a historic boundary. The Applicants acknowledge that PB1 should be considered a heritage asset in its own right. As part of the original assessment searches, however the historic boundary did not feature on the Suffolk Historic Environment Record and was as such only identified through the review of historic maps as part of the ADBA. It is inaccurate for the Councils to suggest that the parish boundary and associated track were not highlighted within the ADBA and considered within **Chapter 24 Archaeology and Cultural Heritage** (APP-072). However, the level of detail and narrative around the track has been enhanced by the subsequent RHLA (SCC, 2019).
24. The historic trackway, the course of which has varied over time (Figures 12-14 of the RHLA (SCC, 2019)), evidently represents a Hundred boundary and later historic parish boundary. Its local and (possible) regional importance is already acknowledged within the ADBA (**Appendix 24.3**) and **Chapter 24 Archaeology and Cultural Heritage** (APP-072), albeit predominantly associated with its potential as an important hedgerow. The Applicants agree that the historic trackway qualifies for consideration as a non-designated heritage asset in its own right.



25. The Applicants would also agree with SCC's summary that as a historic landscape feature the trackway has significance as:
- a) A parish and Hundred boundary; and
  - b) As part of a network of features typical of a settled clayland landscape with commons and greens.
26. Given the route of the PRow / parish and Hundred boundary (PB1), avoidance of a partial loss of this historic trackway is not possible. The Applicants are therefore in discussion with the Councils regarding potential offsetting measures which might reasonably include:
- Further funded research on the parish history and constitute elements of the Friston landscape affected by the Projects; and
  - Utilising any future findings in this regard to make provision for local history group talks and/or webinars; a public facing parish history booklet (or similar); and on the ground historic landscape interpretation panels in and around the revised and updated PRow network together with the opportunity taken with the permanent diversions to re-establish a historic part of a PRow.



## 4 Archaeology (Monument)

27. The Applicants agree that the historic trackway (parish / Hundred boundary) may contain 'evidential value', with the potential (once fully investigated) to establish a clearer form, and additionally as yet unsubstantiated potential for associated activity (e.g. burials at locations on boundaries, including possible 'deviant' burials).
28. However, it is inaccurate for the Councils to suggest that *"The Anglo-Saxon archaeology and potential of the substation development site, and that of the entire development area, was overlooked in the Desk Based Assessment conducted by Headland Archaeology for EA1N/EA2"* (SCC, 2019).
29. Paragraph 221 of the ADBA (**Appendix 24.3**) (APP-514) states that *"there is considered to be a medium to high potential for evidence of an Anglo-Saxon presence, as well as later medieval agricultural land use within the ADBA Study Area"* and goes on to recognise that although *"....medieval sites/features would probably be readily identified through geophysical survey.... In contrast Anglo-Saxon sites are not often revealed through standard geophysical survey approaches (such as magnetometry) and are frequently found to be of at least regional importance where they do survive. The area around the probable church of Buxlow (HA6) has a high or very high potential for burials"*.
30. Also, it is further noted that in addition to an **Outline Written Scheme of Investigation (Onshore)** (APP-582), submitted with the Applications, the Applicants have undertaken initial targeted archaeological and cultural heritage investigation works to inform the post-consent mitigation strategy. The scope and approaches to such works are outlined in three survey-specific Written Schemes of Investigation (WSIs) (Appendix 3, 4 and 5) appended to the **Outline WSI (Onshore)** (APP-582), as consulted on with SCC Archaeological Service (SCCAS). The relevant surveys are:
  - A programme of initial targeted archaeological trial-trenching;
  - Metal detecting survey; and
  - Earthwork identification survey.
31. The Applicants (through their contractor Headland Archaeology) have subsequently undertaken the initial targeted archaeological trial-trenching surveys and earthwork identification, reported on in June 2020, in ongoing communication with SCCAS. Land access for the metal detecting survey in relation to Suffolk HER Record no. KND 009 (1753: *Symbol for 'church or chapel*





*in ruins' on Bowen's map of Suffolk at 'Buxton', north of Friston church) was, however, not granted. Additional intrusive surveys could not be undertaken, as the Applicants must rely on land access granted on a voluntary basis. However, the Applicants have made significant efforts to undertake the initial targeted archaeological trial-trenching surveys at an early stage. Further information will be provided in the Pre-Construction Trial Trenching Report (ExA.AS-13.D1.V1) which will be submitted during Examinations for the Projects at Deadline 1.*

32. The aim of the initial targeted archaeological trial-trenching surveys undertaken by Headland Archaeology was to provide information to establish (at a high-level only) the nature, extent, degree of preservation and likely significance of archaeological features and deposits within four key areas of the onshore development area, and also to evaluate the potential for previously unrecorded remains within those same areas. This was to enable the progression of an appropriate post consent mitigation strategy to be defined, including identifying any features worthy of preservation in situ which may require further design micro-siting considerations during the detailed design stage (within the confines of other environmental and engineering constraints).
33. The aim was to excavate 91 trenches targeted in four discrete areas. The trenches were undertaken in three discrete areas: Area 1 (Substation); Area 3 (Aldringham Road); and Area 4 (Hundred River Crossing). Access to Area 2 (Grove Road Crossing) was sought but was unavailable, reducing the total number of trial trenches to 67. All trench excavations were completed at Area 1, Area 3 and Area 4. The Grove Road crossing trenches were located to target, amongst other anomalies, HA6 as identified in the ADBA – a *Possible chapel evident in Aerial Photos*. HA6 is also noted as possibly representing the remains of Buxlow/Buxton Chapel recorded as KND 009 (see earlier description above) in the Suffolk HER.
34. In total, Headland Archaeology completed 67 out of the proposed 91 trenches. The trenching has broadly demonstrated that the geophysical survey (APP-303) has been a generally reliable indicator of the location and extent of archaeological activity within the onshore development area at the three locations evaluated. It has also provided important information on the date, type and extent of the archaeological resource at these three key locations.
35. In Area 1, only one out of the 39 trenches (which were all completed) located over the footprint of the onshore substation location contained an archaeological feature (an undated fire pit in Trench 27). Other trenches (found to be blank) were located either side of the track (parish / hundred boundary), but no trenches were sited directly over and across the track (in part due to its current ongoing function as a PRow).



36. In Area 3, the evaluation found infilled ditches correlating well to the geophysical survey forming a pattern of enclosure and land division. There were indications of low levels of prehistoric and middle Saxon activity, but most of the finds assemblage indicated activity during the 11<sup>th</sup> – 14<sup>th</sup> centuries AD.
37. In Area 4, the investigations recovered a small amount of prehistoric and Romano-British pottery, again likely residual. A densely intercutting network of linear ditches (more complex than the geophysical survey suggested) which contained evidence of activity from the middle and late Saxon periods and the 11<sup>th</sup> – 14<sup>th</sup> centuries was also recorded.
38. The findings of the initial evaluation are summarised as indicative of a rural agricultural landscape and focused on the better draining land towards the eastern end of the onshore development area with lower levels of archaeological activity on the clay soils at the western end of the onshore development area (i.e. across the onshore substation location).
39. Although to date the parish boundary (with associated track) at Friston has not been subject to targeted archaeological trial-trenching surveys directly across its route, the initial surveys described above involved ten trial trenches at locations in close proximity and/or immediately adjacent to the historic trackway. It is the view of the Applicants that the commitment to 5% sampling of the onshore development area (being progressed by the Applicant) plus ongoing consultation with the Councils' advisers as part of that process, addresses the Councils' concerns that to date insufficient intrusive survey data has been collected.
40. Finally, the Councils have indicated that they consider there to be an opportunity to involve the community in future archaeological investigations. The Applicants will further consider this request within the confines of other constraints, including health and safety, land rights and construction programme.



## 5 Landscape Character

### 5.1 Introduction

41. The Councils have requested that the Applicants incorporate information from the RHLA (SCC, 2019) into the baseline for the LVIA (**Chapter 29 LVIA** (APP-077)). The Councils' consider that the historic landscape features identified could have implications for the landscape sensitivity determined for the onshore substation location.
42. This section of the clarification note addresses these matters relating to landscape and visual impacts, providing:
  - Clarifications to the landscape character baseline, building on the material provided the Applications (**Chapter 24 Archaeology and Cultural Heritage** (APP-072) and **Chapter 29 LVIA** (APP-077)) and other published material, in particular the Suffolk Historic Landscape Characterisation (SCC, 2008) and the RHLA (SCC, 2019).
  - Further consideration of the landscape sensitivity of the onshore substation location, in light of this Historic Landscape Assessment.
  - Further assessment of the impact on the character and historic spatial significance of the dispersed settlement pattern and the physical and visual connectivity with Friston Church, and the landscape.
43. The matters of physical impacts on the Hundred boundary, local historic field boundaries and the setting of the moated site, are addressed separately in **sections 2 – 4** of this clarification note.

#### 5.1.1 Landscape Character Assessment and Historic Landscape Character Assessment

44. Landscape character may be defined as the *“distinct and recognisable pattern of elements, or characteristics, in the landscape that make one landscape different from another, rather than better or worse”* (Natural England, 2019). Landscape Character Assessment (LCA) is *“the process of identifying and describing variation in the character of the landscape. It seeks to identify and explain the unique combination of elements and features (characteristics) that make landscapes distinctive”* (Natural England, 2019). This process results in the production of an LCA. It is primarily concerned with describing the landscape character as it is currently experienced, which varies according to many variables: underlying geology, soils, topography, land cover, hydrology, and climatic considerations, as well as historic and cultural development.



45. There is a close relationship between landscape and historic landscape matters, however GLVIA3 (Landscape Institute, 2013) (paragraph 5.7) is clear that LCA is *“concerned with the landscape as it is today”* and that historic landscape characterisation (HLC) is concerned with *“how the landscape came to be as it is, dealing with historic dimensions such as ‘time depth’ and historical layering”*.
46. HLC is therefore considered to be a method for defining the historic and archaeological dimension of the present-day landscape. It can explain how and why the landscape looks as it does and identify landscape’s ‘time-depth’ – the most important difference to LCA (i.e. the appreciation that change and earlier landscapes exist in the present landscape). HLC typically maps the predominant historic landscape character of discrete patches of land, whether that character is still based on the products of prehistoric and medieval activity or is of much more recent origin.
47. GLVIA3 describes how *“historic landscape characterisation is complementary to LCA. It looks at the material remains of the past and perceptions and interpretations of them, in order to help us understand the present-day landscape”*. The complementary role of HLC is echoed in Natural England guidance (2019) ‘Historic LCAs can inform LCAs and contribute valuable information on the historic environment, but can also sit alongside a LCA’.
48. While GLVIA3 encourages LCA *“to make good use of existing historic landscape information”*, in order to *“reflect a full understanding of the historic characteristics and features of today’s landscape”*, it is also clear that *“sharing of relevant baseline information should not be confused with the need for separate cultural heritage appraisals such as historic landscape characterisation and assessment”* (paragraph 5.11).
49. The following sections of this clarification note do not seek to provide a separate historic landscape characterisation and assessment. Instead, they provide an updated LCA baseline, building on the material provided in the Applications and the recent RHLA (SCC, 2019).
50. The cultural heritage baseline and assessment of effects on the setting of historic buildings, conservation areas and other heritage assets are assessed in full in **Chapter 24 Archaeology and Cultural Heritage** (APP-072), with further commentary on built heritage, the historic trackway and moated site provided in **sections 2 – 4** of this clarification note.

## 5.2 Landscape Character Baseline

### 5.2.1 Environmental Statement

51. A description of the landscape character baseline of the LVIA Study Area is described under ‘Existing Environment’ in **section 29.5** of **Chapter 29 LVIA**



(APP-077) and within detailed baseline descriptions for each relevant landscape character type (LCT) in **Appendix 29.3 Landscape Assessment**.

52. The Applications present a robust landscape character baseline which recognises the contribution of historic landscape features (while not in itself forming a historic landscape characterisation). It is recognised that the RHLA (SCC, 2019) provides more time depth than was provided in **Chapter 29 LVIA** (APP-077), however paragraphs 103 and 104 of **Chapter 29 LVIA** (APP-077) and **section 29.3.1 of Appendix 29.3** (APP-567) recognise the contribution of historic landscape features in their descriptions of the 'Locally Distinctive Characteristics of the Friston Area'.
53. The SCC Landscape Character Assessment (2008;2011) defines the LCT baselines, as agreed during ETG consultations. However, further reference is made to the more detailed Suffolk Coastal LCA (Suffolk Coastal District Council, 2018) in describing the local area baseline for the onshore substation location.
54. The onshore substation and National Grid substation are situated almost entirely within the Ancient Estate Claylands LCT of the Suffolk County LCA and the Heveningham and Knodishall Estate Claylands (L1) of the Suffolk Coastal District LCA (**Figure 1**).
55. The landscape baseline is described in the **section 29.3.1 of Appendix 29.3** (APP-567) as follows:
56. *"The East Anglia TWO (eastern) onshore substation is located within the Ancient Estate Claylands LCT (01), in the area to the north of Friston, near its transition with the Estate Sandlands LCT (07). The rivers draining east and south have divided the edge of the plateau into a series of 'fingers' and this Ancient Estate Claylands landscape is found on those residual areas of plateau, inland of the Estate Sandlands. The National Grid substation is located largely within the Ancient Estate Claylands LCT and partially within the adjacent Estate Sandlands LCT. The Ancient Estate Claylands LCT also occurs to the north and west of the onshore cable route between Saxmundham and Leiston, before its transition into the Estate Sandlands LCT nearer the coast. The Suffolk Coastal LCA (Suffolk Coastal District Council, 2018) identifies these landscape character areas, in which the onshore substation and National Grid substation are located, as the Heveningham and Knodishall Estate Claylands (L1) and the Aldringham and Friston Sandlands (K3). The key characteristics of the LCT are described based on the Suffolk Landscape Assessment (Suffolk County Council, 2011) and are supplemented with a description of the characteristics that are locally distinctive in the Friston area (in the area around the onshore substations), with reference to site survey and the Suffolk Coastal LCA.*



**Key characteristics of LCT:**

- *Dissected plateau is composed of glacial till or boulder clay.*
- *Enclosure pattern is generally ancient and organic in appearance, with some estate influence where rationalisation changed the field pattern into larger, more easily managed units, with straighter boundaries.*
- *The fields are medium to large and the hedges vary from taller hedges with a mix of trees and shrubs, to single-species hedges that are more tightly controlled.*
- *Enclosed former greens and common pastures.*
- *The landscape was often utilised for World War II airfields, which has left a legacy of runway remains and buildings, some of which have been converted to modern industrial use.*
- *The settlement pattern consists of occasional villages and numerous, dispersed hamlets and farmsteads.*
- *Vernacular buildings consist of timber-framed structures interspersed with brick ones, though the brick appearance is frequently just a façade added to an earlier timber frame.*
- *Blocks of ancient semi-natural woodland are scattered throughout the area, made up of oak, ash, field maple, hornbeam and small-leaved lime.*
- *Hedgerow trees are ubiquitous and in many places this landscape can feel well wooded.*
- *Despite the reasonably well-wooded landscape, the plateau landform means that the views are open and can be long. However, the comprehensive network of winding lanes and tall hedges means that other areas can be much more intimate”.*

57. The landscape baseline described in the **Chapter 29 LVIA** (APP-077) (p37-38) and **section 29.3.1 of Appendix 29.3** (APP-567) goes on to recognise the contribution of historic landscape features in the ‘Locally Distinctive Characteristics of the Friston Area’ within the Ancient Estate Claylands LCT, described in the ES as follows:

- *“The characteristic arrangement of the parish consisting of Friston village, church, village green and detached parishes, such as Fristonmoor, which is typical in Suffolk.*
- *The visual relationship between the detached parish of Fristonmoor and the village to the south, which is visually connected in views to Friston church and through the existing public right of way (PRoW) between the village and parish.*





- *Areas of land that have the appearance of common on the village edge provide texture and interest.*
- *The network of small-scale fields to the north of Friston, with strong hedgerow field boundaries and scattered mature deciduous field boundary trees are locally distinctive features. The enclosure pattern is generally ancient, but the field patterns tend to be straight and regularised.*
- *Quiet farmland, with a simple, rural character but a strong sense of agri-business land use evident amongst the medium to large fields towards Fristonmoor and Little Moor Farm.*
- *A network of historic green lanes, most of which have been lost to agricultural intensification and PRowS through the field systems.*
- *Scattered listed farm building buildings, some of which with local vernacular architecture of dark weatherboard and red pantiles, contribute to the sense of place.*
- *There are several ancient farms with 'Hall' or 'Manor' in their names, including Friston Hall and Manor Farm. Friston House is a grade II listed building set in mature woodland on the northern edge of the village.*
- *There are large-scale modern agricultural buildings in the local landscape, particularly those at Redhouse Farm.*
- *Gently undulating landform, formed by relatively flat fields to the west of Grove Road/north of Friston, which rises gradually to the north towards Fristonmoor.*
- *Some variety in visual experience, from more open areas around Fristonmoor with views south to Friston, compared to more enclosed areas in and around the edges of Friston and parts of Grove Road, where strong hedgerows and mature woodland provides visual containment.*
- *Woodland, roadside trees, hedges and field boundary vegetation are often present and form a notable component of the tree cover.*
- *Woodland blocks are also present and numerous. In particular the ancient woodland at Grove Wood (and the adjoining Laurel Covert) provides a distinctive wooded backdrop in the setting of Friston and the surrounding agricultural fields.*
- *Double row of overhead pylons and electrical lines crosses the landscape between the village of Friston and Fristonmoor, form notable visual elements in the local setting and due to their larger vertical scale and form tend to distort the sense of scale in the landscape.*
- *The boundary of Ancient Estate Claylands and Estate Sandlands to the north of Friston is not definitive but suggests a transition in character”.*



58. The distinct and recognisable pattern of these elements and characteristics are described robustly in the landscape baseline presented in **Chapter 29 LVIA**, which recognises that the historic environment contributes to the sense of place of the landscape around the onshore substation location and National Grid substation.

### 5.2.2 Historic Landscape Characterisation (2008)

59. The Suffolk Historic Landscape Characterisation (HLC) (SCC, 2008) is described in the RHLA (SCC, 2019) as providing an initial understanding of the historic landscape around the onshore substation location.
60. The Suffolk historic landscape character types and sub-types are described in the Suffolk Historic Landscape Characterisation (2008) and are mapped in **Figure 2** of this clarification note for the area around the onshore substation location.
61. The Applicants recognise the baseline description of the 2008 HLC provided in Section 4 of the RHLA (SCC, 2019). It is however noted that this does not specifically identify the broad HLC types within which the onshore infrastructure is located. These are considered useful to further the initial understanding of the historic landscape around the onshore substation location.
62. The eastern onshore substation, majority of National Grid substation and part of the western onshore substation would be located within HLC Type 3 'Post-1950 Agricultural Landscape'. The majority of the western onshore substation and western part of the National Grid substation are located within Type 1 'Pre-18<sup>th</sup> Century Enclosure'.
63. Type 3 'Post-1950 Agricultural Landscape' is described in the Suffolk HLC (2008) as *"Areas that have had their character altered as a result of agricultural changes in the post-war period. Historic field patterns have disappeared or been weakened through the removal and remodelling of hedges and other field boundaries. Other important changes are in land use, as in the conversion of meadows into arable land. Overall, these changes have produced 20th-century landscapes, but aspects of their previous character can be determined by reference to earlier mapping, such as the 1st edition Ordnance Survey (see maps provided) or tithe maps"*.
64. It is notable therefore, that the baseline landscape character of much of the onshore substation location and National Grid substation location is described as having been altered as a result of agricultural changes in the post-war period, historic field patterns have disappeared or been weakened, meadows converted to arable land and that these changes have resulted in a 20th-century landscape.





65. Type 1 'Pre-18<sup>th</sup> Century Enclosure' forms a narrow strip from Fristonmoor to Friston, located between areas of Post-1950 Agricultural Landscape, to the western side of the onshore substations and National Grid substation. It is described in the Suffolk HLC (2008) as *"land that was enclosed into fields for agriculture before 1700. In most of Suffolk the landscape is one of 'ancient enclosure', in contrast to areas like the Midlands, where extensive areas of common fields (large 'open' fields subdivided into separately-owned strips) were enclosed using parliamentary acts in the 18th and 19th centuries. In many of the areas of 'ancient enclosure' in Suffolk there is little evidence for a medieval phase of common-field farming: some areas had limited areas of common fields (as in north Suffolk) but in others there were none (as is often the case in south Suffolk). The identification of these earlier landscapes, which date back to medieval and in some cases even earlier, was a priority behind the development of the HLC mapping. These earlier landscapes are of great historic significance and have different management needs to later field systems"*.
66. The historic value of these areas of pre-18<sup>th</sup> century enclosure, located mainly to the west and south-west of the onshore substation location towards Friston village is noted, indicating a transition from east to west / south-west of increasing historic landscape influence in the present-day landscape, where the surviving smaller scale pre-18<sup>th</sup> century enclosed field systems become more evident near Friston.
67. The delineated boundaries between HLC types are rarely clear cut and often indicate a transition in character from one type to another, especially at the regional scale. Local-level assessment of the specific landscape features that are present today in this area indicate that the boundary of the Type 3 Post-1950 Agricultural Landscape and the Type 1 Pre-18<sup>th</sup> century historic landscape types may be more appropriately delineated slightly further to the west. As indicated in the yellow line in **Figure 3**, of this clarification note this may more accurately follow the defined field boundary marked by existing hedgerows, the notable patch of existing field woodland and the parish boundary, rather than the straight line across the onshore substations shown in the Historic LCT dataset.
68. Overall it is considered that the majority of the western substation location and National Grid substation location are located in an area more akin to the Type 3 'Post-1950 Agricultural Landscape', with larger scale irregular fields present in this area, up to the identified field boundary. Although there are areas of higher value pre-18<sup>th</sup> century enclosure evident to the south of this towards Friston (where the field system becomes smaller and more notably enclosed by hedgerows) the 2008 Historic HLC recognises that the landscape is primarily a Post-1950's agricultural landscape that has had its character altered as a result of agricultural changes in the post-war period. Although aspects of its previous



character and features can be determined by reference to earlier historical mapping, changes in land-use have produced a 20<sup>th</sup> century landscape.

### 5.2.3 Friston and Knodishall Rapid Historic Landscape Assessment, 2019

#### 5.2.3.1 Introduction

69. The RHLA (SCC, 2019) presents an assessment of the historic landscape of Friston and Knodishall. It provides a historical take on the landscape, not a description of the present day landscape.
70. The Councils' proposition is that the RHLA (SCC, 2019) should be incorporated into the baseline for the overall LVIA and that the historic landscape features identified could then have implications for the sensitivity of the landscape.
71. The Applicants consider that the RHLA (SCC, 2019) adds historic contextual information to aid the understanding of the historic characteristics of today's landscape and that it should be considered alongside and complementary to **Chapter 24 Archaeology and Cultural Heritage** (APP-072) and **Chapter 29 LVIA** (APP-077) submitted with the Applications, rather than 'incorporated' into the baseline presented in **Chapter 29 LVIA** (APP-077).
72. This accords with guidance on LCA and HLC, referred to in **section 5.1.1** above, and is in line with the purpose expressed in the RHLA (SCC, 2019) (section 1, paragraph 1), which states that *"This report adds detail to, and should be considered alongside, the various archaeological and landscape assessments previously presented by ScottishPower Renewables"*.
73. While the RHLA (SCC, 2019) informs understanding of the historic and archaeological dimension of the present day landscape, it does not describe the landscape character as it is currently experienced, with limited reference to the influence of more contemporary landscape features, including those that have direct influence on the character of the area.
74. The landscape character baseline is adequately described in **Chapter 29 LVIA** (APP-077) and **Appendix 29.3** (APP-567), however its historical context can be further understood with reference to RHLA (SCC, 2019) and the cultural heritage assessment in **Chapter 24 Archaeology and Cultural Heritage** (APP-072), **Appendix 24.3** (APP-514) and **Appendix 24.7** (APP-519).
75. The formation of Friston and Knodishall and the landscape today are described in Section 5 and 6 of the RHLA (SCC, 2019); the surviving historic landscape features evident in the landscape today are described in Section 7. The following sections summarise the key historic landscape features identified in the RHLA (SCC, 2019) that influence the LVIA baseline (**section 5.2.3.2 – 5.2.3.8** of this clarification note) and go on to consider how these could influence landscape sensitivity in **section 5.3** of this clarification note.



#### 5.2.3.2 Parishes of Friston and Knodishall

76. The RHLA (SCC, 2019) identifies that the extents of Friston and Knodishall parishes were altered in 1958 to the boundaries known today. However, it is possible through historical mapping to understand the continuity between their previous shared boundary (based on the 19th century Tithe map) and the Anglo-Saxon boundary of Plomesgate and Blything Hundred (**Plate 2:1**). The shape of Friston and Knodishall parishes are unusual and this is due to the development of the settlements and how the landscape resources were used and shared between parishes.
77. The present day parish boundary is partially recognisable in the landscape by the field boundary hedgerow between Grove Road and the patch of field woodland on the western side of the western substation location. The earlier parish boundary is in part marked by the route of a historic trackway (discussed at **section 5.2.3.7** of this clarification note).

#### 5.2.3.3 Settlements of Friston and Knodishall

78. The RHLA (SCC, 2019) describes that in East Suffolk, settlement began to infill the edges of common land in the Late Saxon to medieval period; field names, isolated moats and deserted medieval settlements are indicators of this. The current settlement pattern tends to remain dispersed with settlement infilling areas of common land, rather than nucleated around a church. This is the case for Friston and Knodishall which both feature common-edge settlement, infilling of common land, isolated moats and dispersed isolated farmsteads. This is typical for East Anglia, and particularly parts of Suffolk.
79. There is a relationship between settlement pattern, parishes and the landscape which is evident in the landscape around Friston, but is also evident and typical in other parts of Suffolk. The arrangement of Friston parish is typical and not unusual in Suffolk (i.e. the 'characteristic visual relationship between the detached parish of Fristonmoor and the village to the south, which is visually connected in views to Friston church' is also likely to occur in other parishes of Suffolk) where a similar visual relationship between villages and outlying farms will exist. In which case most agricultural landscapes in Suffolk would have this same issue of potential interruption of siting development between villages and outlying farmsteads.
80. The RHLA (SCC, 2019) notes that the settlement in Friston gives the impression of an ad hoc and organic development. The main area of settlement developed slightly to the south from the church and is formed in the classic triangular shape of an infilled green. This main area of the Friston settlement is set back at greater distance from the onshore infrastructure than the dispersed northern edge of the village, separated by the village green, areas of common land around St Mary's Church, modern housing on Church Road / Hillcrest and Friston House Wood.



81. The settlement pattern in Knodishall is similar. The church is isolated from the main settlement and isolated dispersed farmsteads are also a characteristic of Knodishall parish. The settlement pattern of isolated farmsteads encroachment on common land has been preserved in the landscape today, although it is noted that Knodishall Common has been preserved on the western side of the village, which contains views to the west. Views of the onshore substation location are completely screened from the village of Knodishall due to the intervening Grove Wood and Laurel Covert.

#### 5.2.3.4 The Farming Landscape

82. The RHLA (SCC, 2019) recognises that East Suffolk has a long history of being a rural landscape with a mixed farming practice which has shaped the landscape seen today. In places field boundaries are irregular, reflecting the piecemeal enclosure of an open-field system and encroachment of common land, with irregular field boundaries evident in the landscape today. The mixed farming economy where land was ‘broken up’ and reclaimed responding to wider socio-economic issues, has continued into the 20<sup>th</sup> century.
83. There is limited reference to the historic and current influence of woodland in the rural landscape within the RHLA (SCC, 2019). Grove Wood and Friston House Wood form large areas of deciduous woodland, in continuous woodland cover since the early 19<sup>th</sup> century to the present day. Plantations on former arable land are also present at Laurel Covert, a 19<sup>th</sup> century plantation forming a geometric shape around the agricultural field boundaries. These extensive and mature woodlands (together with smaller tree belts and hedges) provide visual containment and screening in the landscape and form a notable backdrop to the rural setting and village of Friston.

#### 5.2.3.5 The Landscape Today

84. The RHLA (SCC, 2019) describes how the landscape today continues to be a cultivated arable landscape with pockets of heathland and pasture. Friston Moor has disappeared, having been taken over for cultivation. Some historic trackways and field boundaries are preserved; although in places modern agriculture has removed several historic field boundaries. There is continuity in terms of the dispersed settlement pattern, excepting modern residential expansion, such as at Coldfair Green. The landscape has evolved and developed as a result of human activity and while the dispersed farmsteads are no longer set in their exact contemporary landscapes, their current setting is of farmland, woodland and heathland.
85. There are some features in the present day landscape which are older than others, with greater time depth, that can be appreciated. However, the assessments in the RHLA (SCC, 2019) of the present day landscape that “*this landscape is not dissimilar to the 19<sup>th</sup> century and earlier landscape*” and that



*“there is only very little built development”* miss the fundamental presence of modern development in today’s landscape. In particular, the large-scale electrical transmission infrastructure consisting of the double row of high voltage overhead pylons and electrical lines that cross the landscape between Friston and Fristonmoor (**Photos E** and **G**). The influence of transmission infrastructure is further reinforced by local electrical distribution lines in the area (**Photo F**). There are many examples of other recent contemporary development which differentiate the landscape today from that of the 19<sup>th</sup> century and earlier, including large scale agricultural buildings at Red House Farm (**Photo H**), modern housing development, as well as more contemporary agricultural practices such as turf growing (**Photo I**) and modern farming practices and machinery.

86. These contemporary landscape influences are identified and described in the published landscape baseline contained in **Chapter 29 LVIA** (APP-077) and **Appendix 29.3** (APP-567), alongside the historic landscape influences, combining to shape its current sense of place and distinctiveness.
87. The RHLA (SCC, 2019) finds that *“the current setting of dispersed farmsteads is not too dissimilar from their historic setting of farmland, woodland and heathland”*. Given the presence of the contemporary landscape features and land use influences described above, the setting is clearly different in the present day landscape, than in the historic landscape. Furthermore, it is likely that the historic landscape featured more hedges defining smaller field enclosures, with farmsteads experienced as part of an open agricultural landscape but with greater hedgerow field cover, field trees, tree-lined enclosures and woodland blocks.

#### 5.2.3.6 Historic Field Boundaries

88. Surviving historic 19<sup>th</sup> century field boundaries are shown in Figure 18 of the RHLA (SCC, 2019). They include a hedgerow field boundary within each of the western substation and National Grid substation locations; and the historic trackway which also passes through each of these substations (discussed at **section 5.2.3.7** of this clarification note). Other field boundaries outside the proposed onshore substation locations, which will not be physically affected, are located to the south around smaller enclosed fields towards Friston; and to the north near Fristonmoor and Little Moor Farm. There are no historic field boundaries within the eastern substation location, with the exception of the edge of Laurel Covert.

#### 5.2.3.7 Historic Trackway

89. The existing historic trackway with PRoW access passes through the western substation and National Grid substation locations (**Plate 1:1**). Historically, this was the parish boundary between Knodishall and Friston (but is no longer since





they were altered in 1958). The RHLA (SCC. 2019) presents evidence to suggest that the track and public access originates from the 10<sup>th</sup> century as the boundary between two Anglo-Saxon Hundreds (the Plomesgate and Blything Hundreds) and delineates this Hundred boundary (**Plate 2:1**). The use of the track and PRow access continues today.

90. The existing historic trackway passes directly through the western substation and National Grid substation locations (but not through the eastern substation location). The RHLA (SCC, 2019) interprets this trackway as forming part of a territorial boundary between the Anglo-Saxon Hundreds of Plomesgate and Blything, which continued in use as a parish boundary through to the 20<sup>th</sup> century, until the boundary was altered in 1958. The boundary is traceable in the landscape with its associated footpath along tracks and field boundaries. The RHLA (SCC, 2019) interprets that the location of the track and its proximity to St Mary's Church in Friston suggests that there is a relationship between the two; and that the track has a historic relationship with the settlement of Friston and the wider landscape, connecting the inhabitants of the village and dispersed farmsteads with each other and their local resources.
91. The existing track can currently be recognised as a grassed headland strip, passing through the open irregular cultivated agricultural fields to the north of the parish boundary in Knodishall (**Photos A-C**) and alongside field boundary hedgerows through the smaller fields to the south of the parish boundary in Friston (**Photo D**).
92. Cultivation has largely respected the route of the track, although the track is less apparent in the landscape when the adjacent arable crops have grown up alongside it (**Photo A-B**) and more apparent when the fields are ploughed (RHLA (SCC, 2019) Photo 5). Its contemporary appearance between Friston and Little Moor Farm is generally no more than a grass headland strip passing through large agricultural fields or field edges, visible as relatively subtle landscape feature within the local agricultural landscape (**Photo A-B**), with no interpretation of its historic relevance on the ground.
93. The current route of the track follows the parish boundary from the Tithe Maps (1840s), not the Hundred boundary<sup>1</sup>, which appears to have been lost through the western substation and National Grid substation locations within areas of cultivated land (see Figure 5 and 6 of RHLA (SCC, 2019)). The continuity between the Hundred boundary and the Tithe parish boundary in the current landscape, as expressed by the historic trackway, is therefore not entirely definitive or fully evident in the landscape today.

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<sup>1</sup> The Applicants note this discrepancy may also be due to crude approximation of the pre-modern parish boundary, reflecting rapid digitising of all Hundred boundaries on a county-wide scale.



94. The landscape and trackway is not used in the same way as it was historically. People may still walk along the track between Fristonmoor and Friston but it will not primarily be to access the village and church, but instead as a local recreational route.
95. In the present day landscape, the route of the trackway passes directly under the double row of high voltage overhead pylons and electrical lines that cross the track and the landscape between Friston and Fristonmoor (**Photo D**). These large scale electrical transmission features have a substantial influence on the existing local landscape character experienced from the track, augmented further by the local electrical distribution lines that the track also passes under (**Photo F**).

#### 5.2.3.8 Moated Site at Little Moor Farm

96. The RHLA (SCC, 2019) describes how the earthworks of a rectangular moat are preserved on the edge of the former Friston Moor and adjacent to Little Moor Farm. The RHLA (SCC, 2019) considers the moated site as a Heritage Asset, representative of dispersed rural settlement that adds the local identity with a connection to the surrounding landscape via a network of public footpaths. The moated site is within private land of Little Moor Farm and is not publicly accessible, despite the presence of nearby PRoW.

### 5.3 Landscape Sensitivity

97. The sensitivity to change of the Ancient Estate Claylands LCT is presented in the Technical Assessments contained in **Appendix 29.3** (APP-567) (page 7-8). The sensitivity of the LCT is assessed as 'Medium-high' as follows:
98. *"The Ancient Estate Claylands LCT is assessed as having a medium value. It does not form a constituent part of the AONB, which provides some indication that this LCT is of relatively lower landscape value than the coastal landscapes of East Suffolk and that the LCT will be valued as a resource at the local, rather than national level. There are no SSSI/SAC/SPA/NNR/Ramsar designations within the LCT in the LVIA study area and it has relatively limited recreational value, other than for local rural walking and road cycling. As the largest landscape character area within Suffolk Coastal, it has a relatively widespread/common rural landscape character, although there are pockets of locally distinctive landscapes at the parish level. Broadly, the scenic qualities of the LCT relate to its rural character, setting of semi-natural ancient woodlands and open views, however some of its scenic qualities have been influenced by considerable change through transport routes, airfields, suburbanisation, large-scale agricultural buildings and agri-business, and overhead electrical infrastructure. The local landscape in the Friston area has a strong sense of place and local distinctiveness, with value deriving from the setting of the landscape to the parish*



of Friston, the characteristic arrangement of this parish, the village and outlying farmsteads in the open agricultural setting with a simple, rural character, network of fields with strong hedgerow field boundaries, scattered mature deciduous field boundary trees and distinctive backdrop of ancient woodland (Grove Wood).

99. The LCT is assessed as generally having a medium-high susceptibility to changes arising from the proposed East Anglia TWO onshore infrastructure (eastern onshore substation and National Grid substation). The LCT is most susceptible to changes arising from the proposed East Anglia TWO (eastern) onshore substation and National Grid substation, which are located within this LCT in the area to the north of Friston, and from the construction of the onshore cable route, which is located partially within this LCT between Friston and Knodishall. While the rural character of the LCT is sensitive to changes arising from large scale development, the visual containment of the LCT by extensive woodland blocks, tree belts and hedges, reduces the susceptibility of this LCT to changes arising from the onshore infrastructure. The characteristic arrangement and visual relationship of the parish, the quiet rural setting, network of hedgerow field boundaries and PRowS are susceptible to changes arising from the construction and operation of the onshore substation and National Grid substation in landscape between Friston village and Fristonmoor. However, susceptibility is reduced where the landscape is influenced by the presence of the double row of high-voltage overhead transmission lines, with changes experienced in the context of existing electrical infrastructure and large-scale elements. On balance, the LCT is assessed as having a medium-high sensitivity to changes arising from the proposed East Anglia TWO onshore infrastructure”.

### 5.3.1 Consideration of the Applicants’ Sensitivity Assessment in Light of the HLA

100. It is considered that the sensitivity of the Ancient Estate Claylands LCT is described robustly and in balanced manner in the assessment set out **Chapter 29 LVIA** (APP-077). The assessment recognises that the historic environment contributes to the present day sense of place of the landscape around the onshore substation location, and recognises that the characteristic arrangement and visual relationship of the parish, the village and outlying farmsteads, and its network of hedgerow field boundaries and PRow (the historic trackway) contribute to its sensitivity.
101. In light of all baseline characteristics of the landscape and the nature of the onshore infrastructure, the Ancient Estate Clayland LCT is assessed in the submitted LVIA as being of ‘medium-high’ sensitivity to change.
102. The Councils consider that the historic landscape features identified in the RHLA (SCC, 2019) could have implications for the landscape sensitivity identified for the onshore substation location.





103. The Applicants' assessment is that although the RHLA (2019) furthers understanding of the historic character and time-depth of the landscape around the onshore substation location, specifically identifying several extant historic landscape features, these do not fundamentally change the assessment of 'medium-high' landscape sensitivity assessed for the Ancient Estate Claylands LCT in **Chapter 29 LVIA** (APP-077).
104. This medium-high sensitivity attributed to the Ancient Estate Claylands LCT is already assessed towards the upper end of the sensitivity scale. The presence and further understanding of the historic landscape features identified does not, in the Applicants' assessment, increase the assessed sensitivity of the LCT to 'high' sensitivity.
105. Valued historic landscape features would typically influence the assessed value of the Ancient Estate Claylands LCT, where these individual elements or particular landscape features contribute to value (assessed as part of landscape sensitivity). The value of the Ancient Estate Claylands LCT is assessed as 'medium' in **Chapter 29 LVIA** (APP-077). This assessment does, to some degree, reflect the lack of nationally valued landscapes (National Parks, AONBs) and locally valued landscape designations, and the level of importance that they typically signify.
106. The historic landscape features identified in the RHLA (SCC, 2019) are also not nationally or locally designated / scheduled for their value. The RHLA (SCC, 2019) recommends that the historic trackway, for example, should be recognised as a non-designated heritage asset, but accepts that "*Hundred boundaries are not considered as schedulable monuments in themselves, as their form and location can change over time*".
107. The fact that the area of landscape around the onshore substation location and the historic landscape features within it are not designated, clearly does not mean that it has no value however it is a factor in the overall landscape sensitivity. With reference to the LCA, the assessment of value in **Chapter 29 LVIA** (APP-077) recognises the individual elements and aesthetic aspects of the landscape that are valued, including those relating to historic influences on character:
108. "*The local landscape in the Friston area has a strong sense of place and local distinctiveness, derived from the characteristic arrangement of Friston parish, the village and outlying farmsteads in the open agricultural setting with a simple, rural character, network of fields with strong hedgerow field boundaries, scattered mature deciduous field boundary trees and distinctive backdrop of ancient woodland (Grove Wood), which contribute to the local landscape quality*".



109. The Applicants do accept that the extant historic landscape features identified in the RHLA (SCC, 2019), namely the historic trackway, moated site and local historic field boundaries, add value and cultural heritage interest, together with the characteristic arrangement of Friston parish (already recognised in **Chapter 29 LVIA** (APP-077)). It remains the Applicants' assessment however, that the value of the Ancient Estate Claylands LCT should be assessed as 'medium' overall (as per **Chapter 29 LVIA** (APP-077)), combining with the medium-high susceptibility of the landscape to changes resulting from the onshore substations, to result in a medium-high sensitivity (as assessed in **Chapter 29 LVIA** (APP-077)).
110. Based on the Applicants' understanding of GLVIA 3, Landscapes of highest value are typically those for which character is judged to be intact and in good condition, and where scenic quality, wildness or tranquillity, and natural heritage features make a special contribution to the landscape, or where there are important cultural associations.
111. In practice, a combination of these factors influences the assessment of value and therefore sensitivity of Ancient Estate Claylands LCT. Other factors, such as the scenic quality of the landscape, are also relevant. As recognised in **Chapter 29 LVIA** (APP-077), the scenic quality of the LCT has been influenced by the considerable change through its relationship to the A12 trunk road, intrusion of suburbanisation, large scale modern agricultural buildings and the double row of high-voltage overhead pylons and electrical lines between Friston and Fristonmoor, forming a large scale electrical infrastructure influence in the local landscape. These components notably influence the present day aesthetic and perceptual qualities of the landscape and influence considerations of its value.
112. In summary, although it is acknowledged that the extant historic landscape features identified in the RHLA (SCC, 2019), namely the historic trackway, moated site and local historic field boundaries, provide further understanding of time-depth in the landscape and add value and cultural heritage interest, these do not fundamentally change the assessment of landscape sensitivity assessed for the Ancient Estate Claylands LCT in **Chapter 29 LVIA** (APP-077), which is considered robust and balanced in light of the range of value and susceptibility factors considered in the judgements of the present day landscape character sensitivity.

## 5.4 Landscape Mitigation

113. Mitigation of physical effects on historic features and landscape character is provided in the **OLMP** (APP-401-403) proposals as part of the submitted **OLEMS** (APP-584). The **OLMP** (APP-401-403) proposals recognise the importance of historic field boundaries and propose mitigation for re-instatement of historic field



boundaries, tree lined avenues and woodland blocks to provide notable screening, through the re-introduction of historic landscape features that had been lost over time.

114. Detailed comments were provided by the **OLMP** (APP-401-403) proposals technical working group and LVIA ETG during consultations on this matter, including from Historic England and SCC's Landscape Officer. The historic landscape of the area was taken into consideration in drafting the **OLMP** (APP-401-403). In the area to the immediate north of Friston, the reinstatement of historic field boundaries, filling gaps in existing hedgerows and introducing field boundary trees was considered to be preferable, to provide layered screening, rather than large scale woodland planting close to the village. This will allow the 'setting' of Friston to be retained (rather than being contained by woodland). In other areas, there is potential for establishment of larger woodland blocks akin to the existing pattern of woodland blocks in the landscape.
115. In relation to individual farmsteads, removing the 'farming context' with woodland planting close to farms to screen the onshore and National Grid substations was considered to be potentially damaging to their setting. The preference was for 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 was considered preferable in the **OLMP** (APP-401-403) to retain farms in an open farmed landscape whilst achieving screening through multiple lines of planting.
116. The resulting **OLMP** (APP-401-403) proposals described in **section 3.5.2** of the **OLEMS** (APP-584) seek to be historically appropriate through proposals to re-establish lost field boundaries and seek to achieve screening through multiple lines of planting, with a mix of blocks, belts, tree lines and hedges.
117. The screening tree belts are not placed hard against the houses, footpaths and villages. On the paths, this creates an experience of walking through farmland that includes woodland and the onshore and National Grid substations, rather than always walking past woodland. At the houses, the planting has avoided enclosure of the historic farms in woodland, which is not how they would have been experienced in the past (this applies particularly to the listed buildings on Friston Moor). The **OLMP** (APP-401-403) proposals include re-establishment of historically mapped tree lined enclosures close to the farms to achieve screening whilst retaining the farms in a more open farmed landscape.
118. In the area to the north of Friston and to the south and south-east of Little Moor Farm, there are proposals to re-establish lost historic field boundaries and to seek to achieve screening through multiple lines of planting rather than woodland blocks.



119. Blocks of trees are a feature of the existing landscape and at least one was added in the late 19<sup>th</sup> century so adding more woodland is not inappropriate. However, the proposal includes a mix of blocks, belts, tree lines and hedges to be historically more appropriate, while providing visual screening in views from Friston.
120. The design approach in the **OLMP** (APP-401-403) proposals therefore combines areas of woodland planting, hedgerow planting and individual tree planting to provide a layered screening approach.
121. The magnitude of change assessed in **Chapter 29 LVIA** (APP-077) is mitigated, to some degree by the location of the onshore substations and National Grid substation next to the double row of high-voltage overhead transmission lines, with the changes experienced in the context of this large scale existing electrical infrastructure. The undulating agricultural land and large woodland blocks at Grove Wood and Laurel Covert also provide visual containment of the onshore substations and National Grid substation in the landscape, particularly from the north-east and east. Woodland and hedgerows will have been planted as part of the pre-construction planting and during the first year of the operational phase, which will provide progressive screening over time, from initial limited level of screening when first planted, to partial screening during their establishment period.

## 5.5 Effects on Landscape Character

### 5.5.1 Assessment Presented in Chapter 29 LVIA (APP-077)

122. The effect of the onshore substations and National Grid substation on the character of the Ancient Estate Claylands LCT is presented in the Technical Assessments contained in **Appendix 29.3** (APP-567) (page 9-13). The effect of the onshore substations and National Grid substation on the local area is assessed as part of 'Area A: North of Friston, between Grove Road, Fristonmoor and Saxmundham Road'.
123. In summary, the effect on the landscape character of this area is assessed as being significant within a localised area of approximately 1km around the onshore substations and National Grid substation, becoming not significant on the wider landscape character of the Ancient Estate Claylands LCT. Within this local area, effects on landscape character are assessed as significant but temporary and short-term during the construction period, and significant, long-term and permanent during the operational period.
124. These significant effects are described as occurring as a result of the combination of the medium-high sensitivity of the landscape (see **section 5.3** of this clarification note) and as a result of the high magnitude of change occurring during construction and the early operational period, reducing slightly to medium-



high magnitude of change over the long-term with the influence of the landscape mitigation scheme, but remaining significant in terms of local character change.

## 5.5.2 Consideration of the Applicants' Impact Assessment in Light of HLA

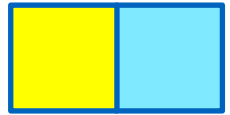
### 5.5.2.1 Construction Effects

125. Without repeating all of the assessment within the ES, which is described in full in **Appendix 29.3** (APP-567) (page 9-13), the following assessments from the ES are highlighted (with underline) by the Applicants as being most pertinent to the issues raised in the RHLA (SCC, 2019).
126. The assessment of the high magnitude of change of construction effects noted the following:
127. *"this area of the Ancient Estate Claylands LCT, to the north of Friston, is likely to be the main area where changes to landscape character will take place as a result of the construction of the onshore substation and National Grid substation. There is potential for both physical changes to landscape elements and changes in character resulting from the alteration/loss of these features.... which will change the character of the landscape and pattern of elements within a localised area... during the construction period".*
128. *"The construction of the proposed East Anglia TWO (eastern) onshore substation and National Grid substation will result in a large-scale change to the local character of this area of the LCT during the construction of the onshore substation.... which will change the network of hedgerow field boundaries and PRowS that allow people to experience the character of the rural local landscape. As the onshore substation and National Grid substation are constructed, the form of the buildings and external electrical infrastructure will take shape during the construction period and influence the existing landscape character, particularly resulting in changes to the local characteristic relationship of the parish between Friston and Fristonmoor. The built forms will increase the prominence of development components in the landscape through the introduction of uncharacteristically large-scale buildings and introduce complex electrical infrastructure, increasing the influence of electrical infrastructure on the character of this area".*

### 5.5.2.2 Operational Effects (First Year of Operational Phase)

129. The assessment of the high magnitude of change of operating effects during the early part of the operational phase noted the following (text underlined as being most pertinent to the issues highlighted in the RHLA (SCC, 2019):
130. *"The area of the Ancient Estate Claylands LCT, to the north of Friston, is likely to be the main area where changes to landscape character will take place.... There is potential for new features associated with the operation of the onshore*





*substations during the operational period to have long-term changes to the character of the landscape and its pattern of elements. The operation of the onshore substations will result in a large-scale change to the local character of this area of the LCT, to the north of the village of Friston.*

131. *The operation of the onshore substations... will increase the developed character of the local landscape in the area to the north of Friston. The built forms will increase the prominence of development components in the landscape through the introduction of uncharacteristically large-scale buildings and introduce complex electrical infrastructure. The principal change to the local character will result from the contrast of the electrical infrastructure and buildings within the predominantly agricultural and wooded setting and the scale/complexity of built forms compared to the existing rural character within the area. The characteristic arrangement and visual relationship of the parish, the rural setting, network of hedgerow field boundaries and PRoWs in the local landscape between Friston and Fristonmoor will all be permanently changed as a result of the operation of the onshore substations and National Grid substation.*

#### 5.5.2.3 Operational Effects (15 Years Post Construction)

132. The assessment of the medium-high magnitude of change of operating effects during the early part of the operational phase noted the following, with underline as being most pertinent to the issues highlighted in the RHLA (SCC, 2019):
133. *“Historic field boundary hedgerows/tree lines and tree blocks will be established (as part of the OLMP, Figure 29.11a-b), set back from villages in the form of locally characteristic ‘Covert’ woods, in order to retain, insofar as possible, the open setting of existing farms and villages, while providing additional visual screening in the landscape. New hedgerows will combine with the woodland planting areas to integrate the substations into the landscape, both in terms of providing screening of the onshore infrastructure and as an extension of an element that is characteristic in the local landscape. Screening will be provided through multiple lines of planting, with a mix of blocks, belts, tree lines and hedges. The reinstatement of gappy hedges and new field trees to north of Friston will provide layered screening in views from this village.*
134. *Although the woodland planted areas are expected to provide substantial integration of the onshore substations and National Grid substation in the local landscape after 15 years into the operational period, the magnitude of change to the landscape character within the localised area of approximately 1.0km around the onshore substation location is assessed as medium-high, with the onshore substations and National Grid substation having notable influence on the local landscape character and the setting of the local area to the north of Friston within a landscape framework of woodland blocks, tree lines and hedges”.*





135. The Applicants consider that the impact on the character and historic spatial significance of the dispersed settlement pattern and the physical and visual connectivity of the landscape to the north of the village with Friston is addressed in the ES assessments, and that significant effects of high magnitude over the short to medium-term, and of medium-high magnitude in the long-term, are already acknowledged and assessed in the ES.

## 5.6 Landscape Character Summary

136. Section 9 'Impact of Development' of the RHLA (SCC, 2019) makes a number of judgements, from the baseline information presented in earlier sections, to impact conclusions of 'harm', 'impossible mitigation', 'massive industrial buildings' and features being 'destroyed', without appropriate balance or Environmental Impact Assessment methodological consideration of sensitivity, magnitude and significant of effect.
137. The RHLA (SCC, 2019) highlights in particular, the impact of the onshore substations on the:
- *"character and historic spatial significance of the dispersed settlement pattern and breakup of the physical and visual connectivity with Friston Church, as well as across the landscape as a whole".*
  - *'rural character of the area, impacting on the character of the rural settlement pattern, which is a feature of east Suffolk, breaking up the landscape and interrupting the connectivity, thereby divorcing the dispersed historic farmsteads from Friston's historic settlement'.*
  - *'extant historic landscape features, including... part of the track as part of the historic Hundred and parish boundary, as well as historic field boundaries'.*
  - *'landscape character and sense of place of Friston and Knodishall'.*
138. While the RHLA (SCC, 2019) furthers understanding of the historic character of the landscape, its time-depth and extant historic features, and highlights the particular effects of the onshore substations and National Grid substation on the local historic character and landscape features, it is considered that it does not fundamentally change the landscape sensitivity or assessment conclusions of **Chapter 29 LVIA** (APP-077) and **Appendix 29.3** (APP-567) in terms of the locally significant effect on landscape character and features already assessed in **Chapter 29 LVIA** (APP-077).
139. **Chapter 29 LVIA** (APP-077) recognises that the characteristic arrangement and visual relationship of the parish, the rural setting, network of hedgerow field boundaries and PRowWs in the local landscape between Friston and Fristonmoor



will be significantly and permanently changed as a result of the operation of the onshore substations and National Grid substation.

140. It also found the potential for the sense of place both physical changes to landscape elements and changes in character resulting from the alteration / loss of these features, which will change the character of the landscape and pattern of elements (including extant historic landscape features such as field boundaries and the PRoW along the historic trackway).
141. The effect on this local landscape is mitigated, to some degree, by the location of the onshore substations and National Grid substation next to the double row of high-voltage overhead transmission lines, which influences the scenic quality (and therefore sensitivity) of the present-day landscape, and means that changes resulting from the onshore substations and National Grid substation are experienced in the context of this large scale existing electrical transmission infrastructure.
142. The route of the transmission line and pylons, which does not follow a straight line passing through the landscape, but instead takes a right angle turn at the deviation towers near Peartree Farm, increases its encompassing / surrounding influence on the onshore substation and National Grid substation locations, because the pylons are situated both to the west, north and north-east of the substation area. The influence of transmission infrastructure is further reinforced by local electrical distribution lines in the area and there are many examples of other recent contemporary development, including large scale agricultural buildings and contemporary agricultural practices which differentiate the landscape today from that of the historic landscape of the past.
143. The undulating agricultural land and large woodland blocks at Grove Wood and Laurel Covert also provide notable visual containment of the onshore substations and National Grid substation in the landscape, particularly from the north-east and east. The screening influence of these large areas of mature woodland plays a notable role in limiting the effects of the substations on the wider landscape character of the area.
144. Further mitigation of physical effects on historic features and landscape character is provided in the **OLMP** (APP-401-403) proposals as part of the submitted **OLEMS** (APP-584). The **OLMP** (APP-401-403) proposals recognise the importance of historic field boundaries and proposes mitigation for re-instatement of historic field boundaries, tree lined avenues and woodland blocks to provide notable screening, through the re-introduction of historic landscape features that had been lost over time.



145. **Chapter 29 LVIA** (APP-077) follows a methodology based on guidance and best practice, with reference to published landscape character assessments and incorporated historic landscape character information. The existing character of the local landscape, its quality, value and sensitivity to change have been considered in judging the significant local impacts of the onshore substations on landscape character.
146. As stated in National Policy Statement (NPS) EN-1 (para 5.9.8) “*Virtually all nationally significant energy infrastructure projects will have effects on the landscape*”. It considered that infrastructure development of the scale proposed would result in at least local significant effects on the character and visual amenity of any landscape. The onshore substations and associated **OLMP** (APP-401-403) proposals have been designed carefully and take account of the potential impact on the landscape. They provide reasonable measures to mitigate effects on historic landscape features, while avoiding effects on the Suffolk Coast and Heaths AONB, which is afforded the highest status of protection in relation to landscape and scenic beauty.



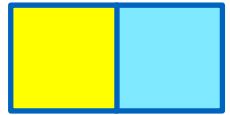
## 6 Summary

147. The Applicants have addressed each of the Councils' queries described in **Table 1.1** in turn.
148. **Section 2** considers the relative contribution of the track feature to the setting of St Mary's Church, Little Moor Farm and connectivity with the historic common land to the north of the village. The relevant sections of the Applicants' Historical Setting Assessment (**Appendix 24.7** (APP-519)) have been signposted. The historic use of the track by residents of Little Moor Farm is noted, however this relationship is not considered to contribute materially to the significance of the farmhouse. It is the Applicants' view that it is the church that derives some part of its significance from this relationship given its focal point from various radial routes leading to the church which allow it to be experienced as a historic landmark. The track is part of the portion of landscape that would be lost to the onshore substations and National Grid substation, but it is the overall landscape character that is considered to be most relevant and most important with regards to the setting of St Mary's Church.
149. **Section 3** and **section 5** consider the significance of the track as a parish and Hundred boundary and as part of a settled clayland landscape. **Section 3** signposts to where this has already been addressed by the Applicants in **Appendix 24.3** (APP-514) and **Chapter 24 Archaeology and Cultural Heritage** (APP-064). The Applicants acknowledge that the parish and Hundred boundary should be considered a heritage asset in its own right and that the level of detail and narrative around the track has been considerably enhanced by the subsequent SCC report (2019).
150. **Section 4** considers the potential evidential value of the track. The Applicants agree that the track (parish / hundred boundary) may contain 'evidential value', with the potential (once fully investigated) to establish a clearer form, and additionally as yet unsubstantiated potential for associated activity (e.g. burials at locations on boundaries, including possible 'deviant' burials). This section signposts to where the Applicants have considered potential evidential value in the ADBA (**Appendix 24.3** (APP-514)). The Applicants have undertaken initial targeted archaeological and cultural heritage investigation works to inform the post-consent mitigation strategy. The scope and approaches to such works were outlined in three survey-specific WSIs appended to the **Outline Written Scheme of Investigation (Onshore)** (APP-582), as consulted on with SCCAS.
151. **Section 5** provides a narrative of SCC's Friston and Knodishall Historic Landscape Assessment in relation to the baseline description provided in



**Chapter 29 LVIA** (APP-077) and considers whether this additional information materially affects the conclusions. While the RHLA (SCC, 2019) furthers understanding of the historic character of the landscape, its time-depth and extant historic features, and highlights the particular effects of the onshore substations on the local historic character and landscape features, it is considered that it does not fundamentally change the assessment conclusions of the LVIA in terms of the locally significant effect on landscape character and features already assessed in the **Chapter 29 LVIA** (APP-077).

152. The Applicants welcome the additional information provided by the Councils in their RHLA (SCC, 2019) with regard to the historic trackway. This document provides some interesting further insight although the Applicants have some reservations about the conclusions which have been drawn which will be discussed further during Examination about the trackway as a historic parish and Hundred boundary. It is the Applicants view that comprehensive and robust consideration of the historic trackway has been completed in the ES and supporting documents described in **section 1.2** of this clarification note. Signposting to these documents has been provided in this note accordingly.
153. The access and amenity value of the historic trackway and its recognition as a PRoW has been considered holistically within each section of this clarification note. Given the route of the PRoW through the onshore substation location, avoidance of a partial loss of this historic trackway is not possible. The Applicants are therefore in discussion with the Councils regarding potential measures which might typically include further funded research on the parish boundary and constitute elements of the Friston landscape affected by the Projects. The findings from such work could then be utilised and presented in a format as agreed with the Councils.



## 7 References

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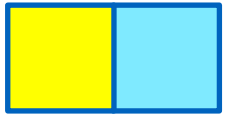
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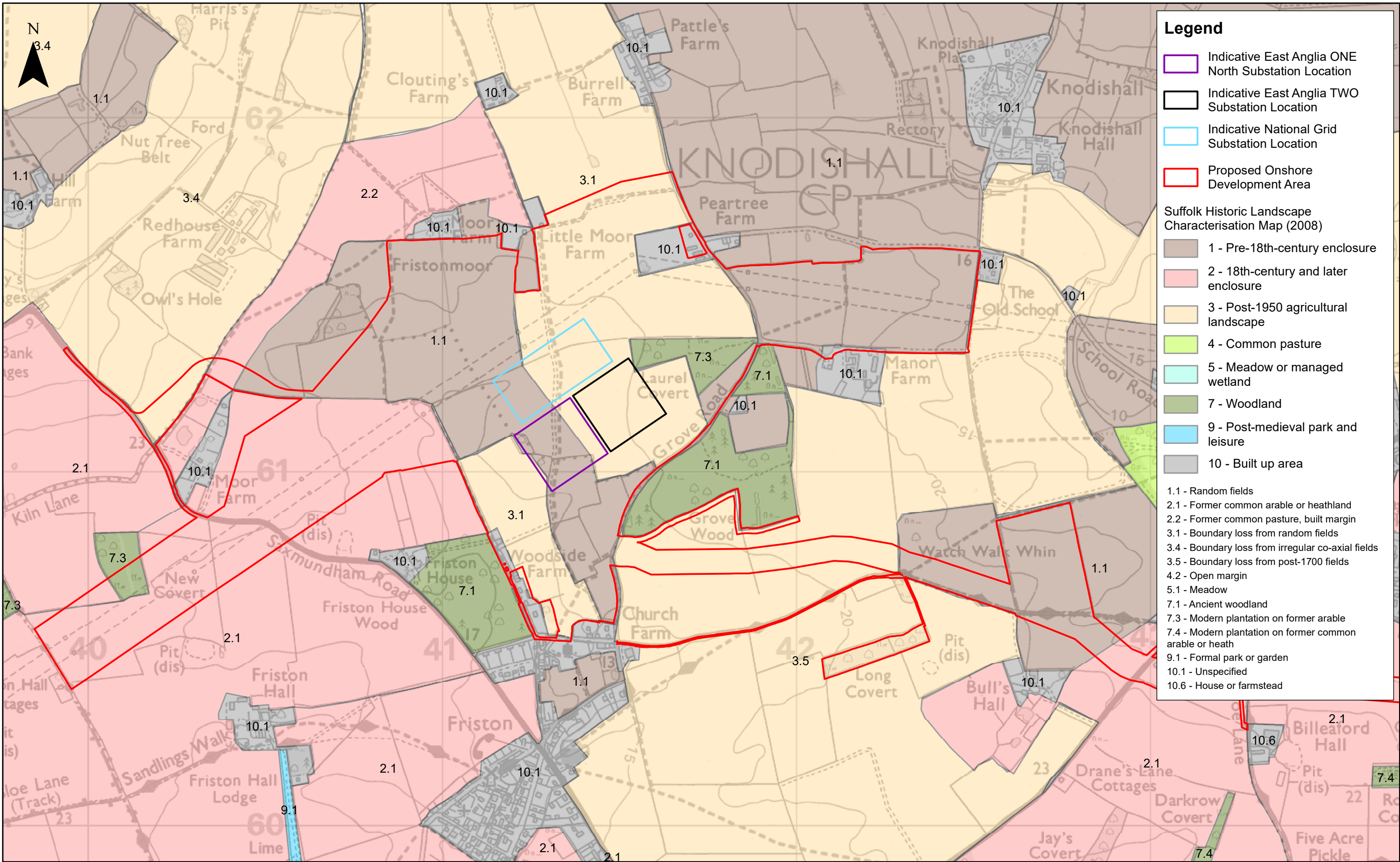




## Appendix 1 Figures

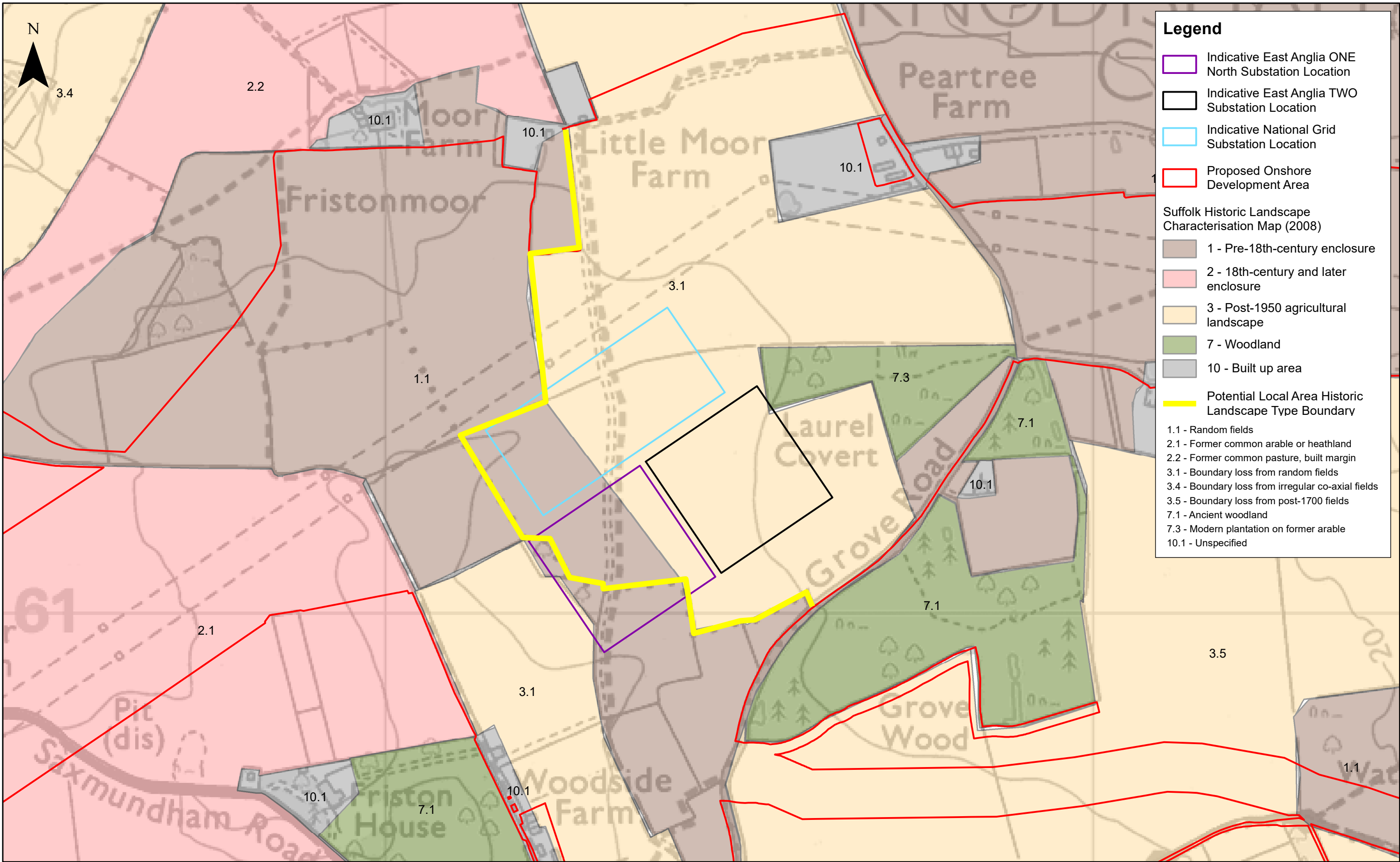








						1:10,000		<b>East Anglia ONE North and TWO</b> <b>Historic Landscape Character</b> <b>Subcategories</b>	<b>Drg No</b>			
	2	26/10/2020	LA	Second Issue (OPEN)	Prepared:	LA			<b>Scale @ A3</b>	<b>Rev</b>	2	Coordinate System: BNG Datum: OSGB36
	1	29/09/2020	LA	First Issue (OPEN)	Checked:	SM	<small>Source: © Crown copyright and database rights 2020, Ordnance Survey 0100031673. Contains public sector information licensed under the Open Government Licence v3.0. This map has been produced to the latest known information at the time of issue, and has been produced for your information only. Please consult with the SPK Ordnance GIS team to ensure the content is still current before using the information contained on this map. To the fullest extent permitted by law, we accept no responsibility or liability (whether in contract, tort (including negligence) or otherwise in respect of any errors or omissions in the information contained in the map and shall not be liable for any loss, damage or expense caused by such errors or omissions.</small>		<b>Date</b>	26/10/20		
	<b>Rev</b>	<b>Date</b>	<b>By</b>	<b>Comment</b>	<b>Approved:</b>	LT	<b>Figure</b>		2			



**Legend**

Indicative East Anglia ONE North Substation Location

Indicative East Anglia TWO Substation Location

Indicative National Grid Substation Location

Proposed Onshore Development Area

Suffolk Historic Landscape Characterisation Map (2008)

1 - Pre-18th-century enclosure

2 - 18th-century and later enclosure

3 - Post-1950 agricultural landscape

7 - Woodland

10 - Built up area

Potential Local Area Historic Landscape Type Boundary

1.1 - Random fields

2.1 - Former common arable or heathland

2.2 - Former common pasture, built margin

3.1 - Boundary loss from random fields

3.4 - Boundary loss from irregular co-axial fields

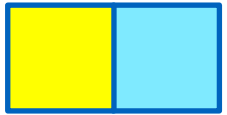
3.5 - Boundary loss from post-1700 fields

7.1 - Ancient woodland

7.3 - Modern plantation on former arable

10.1 - Unspecified

						1:5,000 Scale @ A3				<b>East Anglia ONE North and TWO</b>		<b>Drg No</b>			
				2	26/10/2020	LA	Second Issue (OPEN)	Prepared:	LA	<b>Local Area</b>		<b>Rev</b>	2	Coordinate System: BNG Datum: OSGB36	
				1	29/09/2020	LA	First Issue (OPEN)	Checked:	SM	<b>Historic Landscape Character</b>		<b>Date</b>	26/10/20		
				<b>Rev</b>	<b>Date</b>	<b>By</b>	<b>Comment</b>	<b>Approved:</b>	LT			<b>Figure</b>	3		



## Appendix 2 Photos





Photo A: The historic trackway (passing through the cultivated agricultural fields)



Photo B: The historic trackway (near Little Moor Farm)



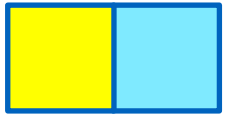


Photo C: The historic trackway (passing through the East Anglia ONE North substation site)



Photo D: The historic trackway (alongside hedgerow field boundary north of Friston)



Photo E: High voltage electrical distribution pylons/lines over trackway



Photo F: Local electrical distribution lines under which the track passes





Photo G: National and local electrical transmission pylons and overhead lines crossing the onshore substation site



Photo H: Recent large-scale agricultural buildings at Redhouse Farm



Photo I: Modern agricultural practices, turf growing near Grove Wood, Friston