



**SCOTTISHPOWER
RENEWABLES**

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Responses to Examining Authority's Written Questions

Volume 10 - 1.8 Historic Environment

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



Revision Summary				
Rev	Date	Prepared by	Checked by	Approved by
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Description of Revisions			
Rev	Page	Section	Description
001	n/a	n/a	Final for Deadline 1



This document is supported by the following appendices:

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2	East Anglia ONE Substation Detailed Design Document
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Glossary of Acronyms

AA	Appropriate Assessment
AADT	Annual Average Daily Traffic
ADD	Acoustic Deterrent Devices
AEOI	Adverse Effect on Integrity
AIL	Abnormal Indivisible Load
AIS	Air Insulated Switchgear
ALC	Agricultural Land Classification
ALO	Agricultural Liaison Officer
ANO	Air and Navigation Order
AONB	Area of Outstanding Natural Beauty
APP	Application Document
AST	Assured Shorthold Tenancies
ATC	Automatic Traffic Counts
BCT	Bat Conservation Trust
BEIS	Department of Business Energy and Industrial Strategy
BMV	Best and Most Versatile
BoR	Book of Reference
BT	British Telecom
CA	Compulsory Acquisition
CCS	Construction Consolidation Sites
Cd	Candela
CfD	Contract for Difference
CIA	Cumulative Impact Assessment
CIEEM	Chartered Institute of Ecology and Environmental Management
CION	Connection and Infrastructure Options Note
COCP	Code of Construction Practice
dB	Decibels
DCO	Development Consent Order
DML	Deemed Marine Licence
DMO	Destination Management Organisation
DMRB	Design Manual for Roads and Bridges
EA	Environment Agency
EIA	Environmental Impact Assessment
EM	Explanatory Memorandum
EMP	Ecological Management Plan
ES	Environmental Statement
ESC	East Suffolk Council
ESCA	European Subsea Cables Association
ESDAL	Electronic Service Delivery for Abnormal Loads
ETG	Expert Topic Group
ExA	Examining Authority
ExQs	Examining Authorities First Written Questions
FID	Final Investment Decision
FRA	Flood Risk Assessment
GEART	Guidelines for the Environmental Assessment of Road Traffic
GIS	Gas Insulated Switchgear
GLVIA	Guidelines for Landscape and Visual Impact Assessment
Ha	Hectares
HDD	Horizontal Directional Drilling
HE	Historic England



HGV	Heavy Goods Vehicle
HRA	Habitats Regulations Assessment
ICPC	International Cable Protection Committee
IPSIP	In Principle Site Integrity Plan
Km	Kilometres
kV	Kilovolt
LAT	Lowest Astronomical Tide
LCA	Landscape Character Assessment
LCT	Landscape Character Type
LiDAR	Light Detection and Ranging
LIQ	Land Interest Questionnaire
LLFA	Lead Local Flood Authority
LMP	Landscape Management Plan
LPA	Local Planning Authority
LSE	Likely Significant Effects
LVIA	Landscape and Visual Impact Assessment
M	Metres
MCA	Marine Coastguard Agency
MCTC	Manual Classified Turning Counts
MHWS	Mean High Water Springs
MMMP	Marine Mammal Mitigation Protocol
MMO	Marine Management Organisation
MoD	Ministry of Defence
MoU	Memorandum of Understanding
MW	Megawatt
MWh	Megawatt Hours
NALEP	The New Anglia Local Enterprise Partnership
NATS	National Air Traffic Service
NCTA	National Coastal Tourism Academy
NE	Natural England
NGET	National Grid Electricity Transmission
Nm	Nautical Miles
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
OAMP	Outline Access Management Plan
OCTMP	Outline Construction Traffic Management Plan
OFTO	Offshore Transmission Owner
OLEMS	Outline Landscape and Ecological Management Strategy
OMLP	Outline Management and Landscape Plan
ORJIP	Offshore Renewables Joint Industry Programme
OTP	Outline Travel Plan
PD	Procedural Decision
PEIR	Preliminary Environmental Impact Report
PEMP	Project Environmental Management Plan
PIL	Persons with an interest in Land
PPG	Planning Practice Guidance
PRoW	Public Right of Way
PS	Policy Statements
PTP	Port Travel plan
PVA	Population Viability Analysis
RAG	Red Amber Green
RLoS	Radar Line of Sight



RR	Relevant Representation
RSPB	Royal Society for the Protection of Birds
RTD	Red Throated Diver
RWS	Rijkswaterstaat
SAC	Special Area of Conservation
SCC	Suffolk County Council
SCCAS	Suffolk County Council Archaeology Service
SCHAONB	Suffolk Coats and Heaths Area of Outstanding Natural Beauty
SLVIA	Seascape, Landscape and Visual Impact Assessment
SMP	Shoreline Management Plan
SNS	Southern North Sea
SoCG	Statement of Common Ground
SoS	Secretary of State
SPA	Special protected Area
SPR	ScottishPower Renewables
SSSI	Site of Special Scientific Interest
STEM	Science, Technology and Engineering and Mathematics
SuDS	Sustainable Urban Drainage System
SZC	Sizewell C
TCE	The Crown Estate
TH	Trinity House
TMZ	Transponder Mandatory Zone
TP	Temporary Purchase
TPO	Tree Purchase Order
TWT	The Wildlife Trust
UK	United Kingdom
UKCP	United Kingdom Climate Projections
UXO	Unexploded Ordinance
VP	Viewpoint
WQ	Written Question
WR	Written Representation
WSI	Written Scheme of Investigation
ZTV	Zone of Theoretical Visibility



Glossary of Terminology

Applicants	East Anglia TWO Limited / East Anglia ONE North Limited
Cable sealing end compound	A compound which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Cable sealing end (with circuit breaker) compound	A compound (which includes a circuit breaker) which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Construction consolidation sites	Compounds associated with the onshore works which may include elements such as hard standings, lay down and storage areas for construction materials and equipment, areas for vehicular parking, welfare facilities, wheel washing facilities, workshop facilities and temporary fencing or other means of enclosure.
Construction operation and maintenance platform	A fixed offshore structure required for construction, operation, and maintenance personnel and activities.
The Councils	East Suffolk Council and Suffolk County Council
Development area	The area comprising the onshore development area and the offshore development area (described as the 'order limits' within the Development Consent Order).
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia 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.
East Anglia TWO windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
European site	Sites designated for nature conservation under the Habitats Directive and Birds Directive, as defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017 and regulation 18 of the Conservation of Offshore Marine Habitats and Species Regulations 2017. These include candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas.
Generation Deemed Marine Licence (DML)	The deemed marine licence in respect of the generation assets set out within Schedule 13 of the draft DCO.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
HDD temporary working area	Temporary compounds which will contain laydown, storage and work areas for HDD drilling works.



Inter-array cables	Offshore cables which link the wind turbines to each other and the offshore electrical platforms, these cables will include fibre optic cables.
Jointing bay	Underground structures constructed at intervals along the onshore cable route to join sections of cable and facilitate installation of the cables into the buried ducts.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
Link boxes	Underground chambers within the onshore cable route housing electrical earthing links.
Meteorological mast	An offshore structure which contains metrological instruments used for wind data acquisition.
Mitigation areas	Areas captured within the onshore development area specifically for mitigating expected or anticipated impacts.
Marking buoys	Buoys to delineate spatial features / restrictions within the offshore development area.
Monitoring buoys	Buoys to monitor <i>in situ</i> condition within the windfarm, for example wave and metocean conditions.
National electricity grid	The high voltage electricity transmission network in England and Wales owned and maintained by National Grid Electricity Transmission
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 / 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.
Natura 2000 site	A site forming part of the network of sites made up of Special Areas of Conservation and Special Protection Areas designated respectively under the Habitats Directive and Birds Directive.
Offshore cable corridor	This is the area which will contain the offshore export cables between offshore electrical platforms and landfall.
Offshore development area	The East Anglia TWO / East Anglia ONE North windfarm site and offshore cable corridor (up to Mean High Water Springs).



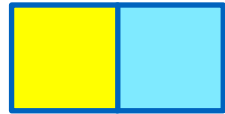
Offshore electrical infrastructure	The transmission assets required to export generated electricity to shore. This includes inter-array cables from the wind turbines to the offshore electrical platforms, offshore electrical platforms, platform link cables and export cables from the offshore electrical platforms to the landfall.
Offshore electrical platform	A fixed structure located within the windfarm area, containing electrical equipment to aggregate the power from the wind turbines and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which would bring electricity from the offshore electrical platforms to the landfall. These cables will include fibre optic cables.
Offshore infrastructure	All of the offshore infrastructure including wind turbines, platforms, and cables.
Offshore platform	A collective term for the construction, operation and maintenance platform and the offshore electrical platforms.
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 cables	The cables which would bring electricity from landfall to the onshore substation. The onshore cable is comprised of up to six power cables (which may be laid directly within a trench, or laid in cable ducts or protective covers), up to two fibre optic cables and up to two distributed temperature sensing cables.
Onshore development area	The area in which the landfall, onshore cable corridor, onshore substation, landscaping and ecological mitigation areas, temporary construction facilities (such as access roads and construction consolidation sites), and the National Grid Infrastructure will be located.
Onshore infrastructure	The combined name for all of the onshore infrastructure associated with the proposed East Anglia TWO / East Anglia ONE North project from landfall to the connection to the national electricity grid.
Onshore preparation works	Activities to be undertaken prior to formal commencement of onshore construction such as pre-planting of landscaping works, archaeological investigations, environmental and engineering surveys, diversion and laying of services, and highway alterations.
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 / East Anglia ONE North project.
Platform link cable	Electrical cable which links one or more offshore platforms. These cables will include fibre optic cables.
Safety zones	A marine area declared for the purposes of safety around a renewable energy installation or works / construction area under the Energy Act 2004.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations as a result of the flow of water.
Transition bay	Underground structures at the landfall that house the joints between the offshore export cables and the onshore cables.
Transmission DML	The deemed marine licence in respect of the transmission assets set out within Schedule 14 of the draft DCO.



ExA. Question Ref.	Question addressed to	ExA. Question	Applicants' Response
1.8 Historic Environment			
1.8.1	The Applicant	<p>1 2 Historic Environment Policy Balance</p> <p>Paragraph 51 of Chapter 24 of the ESs [APP-072,] contains a precis of Table 24-4 and aims to summarise Government policy. This states that government guidance provides a framework which, amongst other items:</p> <p><i>“places weight on the conservation of designated heritage assets (which include world heritage sites, scheduled monuments, listed buildings, protected wreck sites, registered parks and gardens, registered battlefields or conservation areas), with any anticipated substantial harm weighed against the public benefits of the proposal”.</i></p> <p>However, NPS EN-1 states:</p> <p><i>“Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development”</i> (para 5.8.15)</p> <p>and that:</p> <p><i>“Substantial harm to or loss of a grade II listed building park or garden should be exceptional”,</i> with substantial harm to or loss of designated assets of the highest significance, including grade II*listed buildings considered as wholly exceptional (para 5.8.14).</p> <p>The National Planning Policy Framework (NPPF) states that:</p>	<p>a) The Applicants agree with the ExA's summary of the Government policy and guidance that is set out in NPPF and NPS EN-1. However, the Applicants would highlight that paragraph 5 of the NPPF states <i>“The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework”.</i> The Applicants therefore note the emphasis in the NPPF on meeting the specific tests of the NPS. Further details on how the Projects meet these tests is provided in Table 6.19 of the Development Consent and Planning Statement (APP-579).</p> <p>b) The Applicants do not agree with the interpretation as set out in the question, given the reliance in that summary on the specific NPPF policy</p>



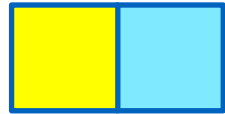
ExA. Question Ref.	Question addressed to	ExA. Question	Applicants' Response
		<p><i>"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any harm amounts to substantial harm, total loss or less than substantial harm to its significance."</i> [ExA's emphasis, para 193]</p> <p>The NPPF goes on to state that any harm to or loss the significance of a designated heritage asset (including from development within its setting) should require clear and convincing justification (para 194), that substantial harm requires substantial public benefits that outweigh that harm (para 195) and that less than substantial harm should be weighed against the public benefits of the proposal (para 196).</p> <ul style="list-style-type: none"> a) Do you agree with the ExA's summary of Government policy and guidance above? b) If so, do you agree that a more correct interpretation of Government guidance for the ES would be that guidance places great weight on the conservation of designated heritage assets, and that any anticipated substantial harm should be outweighed by substantial public benefits and that substantial harm to or loss of a grade II listed building should be exceptional, or to a grade II*listed building considered as wholly exceptional? c) And having reached this position, please review the assessments of impacts on relevant historic 	<p>which, as stated above, does not apply to NSIPs. In particular the policy of "great weight" set out in paragraph 193 of the NPPF is not reflected in paragraph 5.8.15 of NPS EN-1. Section 104 of the Planning Act 2008 gives statutory weight to the NPS policy and where there are differences the NPS specific policy should be applied. Notwithstanding the requirement to give primacy to NPS policies, there are aspects of the NPPF which are likely to be relevant and material. Subsequent questions discuss aspects of impact on Listed buildings. It is important to note that the Statutory test for considering such impacts is also slightly different from that applying in the standard Planning context. The test of having "special regard" as set out in section 66 of the Planning (Listed Buildings and Conservation areas) Act 1990 is reduced to having "regard" through regulation 3 of the Infrastructure Planning (Decisions) regulations 2010. The different legal and policy tests are important to the decision making context.</p>



ExA. Question Ref.	Question addressed to	ExA. Question	Applicants' Response
		<p>built assets, ensuring that the appropriate policy tests are applied.</p> <p>d) If you do not agree with the ExAs' policy summary above, please provide reasoned justification as to why not.</p>	<p>The Applicants assessment in Chapter 24 Archaeology and Cultural Heritage (APP-072) notes the potential impact on landscape character and historical setting of the Church of St Mary. This is reflected by the determination of low adverse impact magnitude. It is therefore the Applicants' view that there is no anticipated substantial harm as worded in the NPS.</p> <p>c) The Applicants note that 'Harm' as used in NPS and NPPF (including the concept of 'substantial harm') is measured by impact magnitude as opposed to significance of effect. It is therefore the Applicants view that it is findings on impact magnitude that feed directly into the policy tests provided by both the NPS and NPPF.</p> <p>The distinction between the NPS and NPPF is immaterial to the Applicants' assessments. It does not affect the Applicants' assessments of impact magnitude as these are based on an understanding of the heritage significance of an asset and an analysis of how this would be affected by the Projects.</p>



ExA. Question Ref.	Question addressed to	ExA. Question		Applicants' Response
				d) The Applicants do not agree entirely with the ExA's policy summary, see answer to a) above
1.8.2	The Applicant	1	2	<p>Heritage significance and heritage importance ES Chapter 24, Paragraph 24.4.4.1 [APP-072] considers heritage significance versus heritage importance and states that:</p> <p>"Although not yet articulated in any published form, emerging good practice makes the following distinction between the terms heritage significance and heritage importance"</p> <ul style="list-style-type: none"> Provide any evidence of such emerging good practice which may have arisen since the publication of the ES. <p>No new evidence has arisen since the submission of the Applications regarding this matter. As explained in section 24.4.4.1 of Chapter 24 Archaeology and Cultural Heritage (APP-072), the issue remains one of clarity of vocabulary, not assessment methodology. 'Significance' for the purposes of heritage policy is a defined term (NPPF Annex 2: Glossary) but 'importance' in this context is not defined. However, the Applicants' definition and use of the term in the Applications accords with its use in the text of both NPS EN1 and NPPF:</p> <p><i>"The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential"</i> (NPS EN1 paragraph 5.8.8 and NPPF para 189)</p> <p><i>"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)"</i> (NPPF paragraph 193).</p>

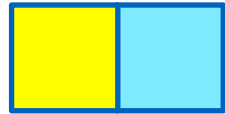


ExA. Question Ref.	Question addressed to	ExA. Question		Applicants' Response
				<i>"Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact"</i> (NPPF paragraph 199).
1.8.3	The Applicant	1	2	<p>Less than substantial harm The ES concludes that in all cases both with and without mitigation, any adverse impacts on significance to the following heritage assets are considered to represent less than substantial harm for the purposes of the NPS and NPPF:</p> <ol style="list-style-type: none"> 1. Little Moor Farm (1215743, Grade II). 2. High House Farm (1216049, Grade II). 3. Friston House (1216066, Grade II). 4. Woodside Farmhouse (1215744, Grade II). 5. Church of St Mary, Friston (1287864, Grade II*). 6. Friston War Memorial (1435814, Grade II). 7. Friston Post Mill (1215741, Grade II*). 8. Aldringham Court (1393143, Grade II). <p>a) Do you consider that there are varying degrees of harm within the scale of 'less than substantial harm'. If so, how would you assess the level of less than substantial harm in relation to each designated heritage asset and how might such an assessment be measured?</p> <p>b) Do you agree that the ExA is required to give great weight to less than substantial harm to the significance of a designated heritage asset?</p>

a) The policy of both NPS EN-1 and NPPF only recognises two degrees of harm, these are 'substantial' and 'less than substantial'. As stated by the ExA, all cases of harm identified in the ES are considered to be less than substantial (or a magnitude that is less than substantial).

The impact assessment methodology in **section 24.4.4** of **Chapter 24 Archaeology and Cultural Heritage** (APP-072) defines three levels of adverse impact magnitude (High, Medium and Low, **Table 24.8**) and this allows for the recognition of degrees of harm within the category 'less than substantial harm'.

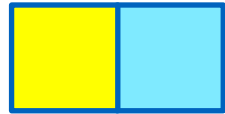
The three levels of adverse impact were used in the onshore setting assessment in **Chapter 24 Archaeology and Cultural Heritage** (APP-072) (informed by **Appendix**



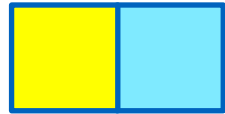
ExA. Question Ref.	Question addressed to	ExA. Question	Applicants' Response
			<p>24.7 Assessment of the Impact of Onshore Infrastructure in the Setting of Heritage Assets and Annexes (APP-519 & APP-520)).</p> <p>Magnitude of impact was also expressed in terms of NPS/NPPF 'harm'. As noted in footnotes to Tables 2 and 3 of Appendix 24.7 (APP-519 & APP-520), "Adverse impacts of low and medium magnitude are the equivalent of less than substantial harm. Impacts of negligible magnitude are the equivalent of no material harm."</p> <p>Adverse impacts of high magnitude would be the equivalent of substantial harm but this was not noted because no cases had been identified.</p> <p>It is therefore possible to subdivide assessments of less than substantial harm into two groups based on findings of impact magnitude. Assessments of low adverse magnitude lie in the lower end of the range covered by 'less than substantial' and assessments of medium adverse magnitude lie in the higher end of that range.</p>



ExA. Question Ref.	Question addressed to	ExA. Question		Applicants' Response
				<p>Assessments of negligible impact are considered to be too low to constitute material harm.</p> <p>Considering the summaries of assessments in Table 2 of Appendix 24.7 (APP-519 & APP-520) only two assets would experience impacts in the higher end of the range covered by less than substantial harm. These are Little Moor Farm and Woodside Farm. There would only be residual impact (Table 3) for Little Moor Farm. All other adverse impacts would lie in the lower end of the range covered by less than substantial harm.</p> <p>b) It is the Applicants view that this is not required because it is a policy requirement of the NPPF. It is considered that the ExA should apply the Policy tests in the NPS EN-1 and the legal requirement set out in the answer to ExA Q 1.8.1.</p>
1.8.4	The Applicant	1	2	<p>Little Moor Farm and High House Farm</p> <p>ES Appendix 24.7 [APP-519-520] sets out the assessment of the effect of the proposals upon the setting and the significance of Little Moor Farm and High House Farm/Moor Farm. This considers that the setting of Little Moor Farm would be changed from a predominantly rural agricultural character (albeit with existing pylons) to a mix</p> <p>The relevance of the PRoW between Little Moor Farm and Friston to the setting of heritage assets has been discussed in the Cultural Heritage Clarification Note submitted at Deadline 1 (ExA.AS-10.D1.V1).</p>



ExA. Question Ref.	Question addressed to	ExA. Question	Applicants' Response
		<p>of industrial infrastructure and rural agriculture, and that for Moor Farm the presence of the onshore substations and National Grid substation, only 450m to the south-east, would represent a significant change in the character of the landscape in views looking south-east in the setting of this heritage asset.</p> <p>However, harm in both cases is considered to be limited and low respectively. The ExA note that both heritage assets are linked to Friston by a PRoW (Little Moor Farm more directly) which would be lost as a result of the proposals, and that potentially this PRoW could have been a historical route linking the settlement and its church to the outer properties in the parish.</p> <ul style="list-style-type: none"> Given the acknowledged significant change in the character of the rural landscape to the south of these heritage assets and the loss of a linkage to Friston, do you still consider such harm to be limited and low, and if so, why? 	<p>In the case of Little Moor Farm, it was concluded that severance of this route does not alter the assessment of impacts. Therefore, as summarised in Tables 2 and 3 of Appendix 24.7 (APP-519 & APP-520), there would be an adverse impact of medium magnitude on the significance of Little Moor Farm for all three scenarios, with and without mitigation.</p> <p>As described in paragraphs 52 and 53 of Appendix 24.7 (APP-519 & APP-520), these findings of medium magnitude impacts for Little Moor Farm reflect the fact that although there would be a significant change in the character of the landscape in views looking south in the setting, this constitutes only one aspect the significance of the asset and the magnitude of the impact on the overall heritage significance is still limited.</p> <p>This is because the significance of this Listed Building (and the justification for its designation) relates primarily to its historic fabric, which would be unaffected. Screening by vegetation means that the historic character of the building can only be appreciated in close-range views and these views (particularly from the east) would not be affected. Similarly, our ability to appreciate the relationship between Little Moor Farm</p>



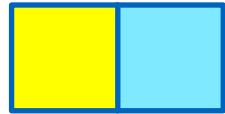
ExA. Question Ref.	Question addressed to	ExA. Question		Applicants' Response
				<p>and the other historic settlements on the edge of Friston Moor would be unaffected.</p> <p>High House Farm was not discussed in the Cultural Heritage Clarification Note submitted at Deadline 1 (ExA.AS-10.D1.V1).]. This is because it is not directly linked to Friston by the PRoW that would be lost as a result of the Projects so the issue raised by the ExA with regard to Little Moor Farm does not arise. There is a second PRoW that runs south from High House Farm directly to Friston and this would not be affected.</p> <p>The analysis of the setting of High House Farm shares much in common with Little Moor Farm but, in the final assessment, impacts were judged to be of low magnitude i.e. less than at Little Moor Farm. This difference primarily reflects the fact that High House Farm cannot be so readily appreciated from its setting, diminishing the contribution of the views affected by the proposed projects to the significance of this asset.</p>
1.8.5	The Applicant	1	2	<p>Friston House</p> <p>ES Appendix 24.7 [APP-519-520] considers that the proposed developments would have a very limited impact on the experience of Friston House in an attractive woodland setting, and would not materially detract from the contribution that it makes to the significance of the house.</p> <p>It is important to note that heritage policy does not recognise 'impacts on setting'. It is concerned only with impacts on the significance of a heritage asset, which may result from change in the setting of that asset.</p>



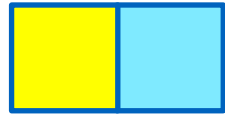
ExA. Question Ref.	Question addressed to	ExA. Question		Applicants' Response
				<p>While the ExA note your views in respect of the original layout of the house and its grounds, this original layout and woodland setting of the House itself is set within a largely rural open landscape which will undergo significant change as a consequence of the proposal.</p> <ul style="list-style-type: none"> Do you consider that the proposal would have an adverse impact on this wider setting?
1.8.6	The Applicant	1	2	<p>Woodside Farm ES Appendix 24.7 [APP-519-520] considers that the presence of onshore substations and National Grid substation only 300m to the northeast would represent a significant change in the character of the landscape in views looking northeast in the immediate setting of Woodside Farm, but that “the magnitude of the impact on the overall heritage significance is limited”.</p> <p>While noting the reasoning within the document concerning screening, the ExA note that the proposed infrastructure would be located some 300m away from the property in an area of currently largely open farmland.</p>
				<p>As set out in the assessment of Friston House (from paragraph 71 in Appendix 24.7 (APP-519 & APP-520)), the contribution that setting makes to the significance of this asset is limited to the enclosed wooded grounds in which it was designed to be experienced.</p> <p>The wider landscape setting of Friston House makes no contribution to its significance and the predicted visual change due to the proposals (as illustrated by CH VP6 and CH VP7 of Appendix 24.7(APP-519 & APP-520)) would have only a very limited impact on the experience of the house. In this context, the fact that the largely rural open landscape would undergo significant change has no impact on the significance of Friston House.</p>
				<p>The analysis of the significance of Woodside Farm (from paragraph 81 of Appendix 24.7(APP-519 & APP-520)) is similar to that at Little Moor Farm and the comment regarding ‘limited’ impact should be understood in the same way that it was at Little Moor.</p> <p>It is recognised that the change in landscape character without mitigation would be considerable but the impact that this has on the significance of the asset is limited by the</p>



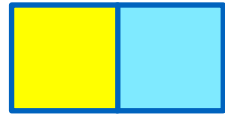
ExA. Question Ref.	Question addressed to	ExA. Question		Applicants' Response
				<p>fact that the rural landscape character is only one element that contributes to the overall significance.</p> <p>The significance of this Listed Building (and the justification for its designation) relates primarily to its historic fabric, which would be unaffected. There are no long-range views so the farmhouse is very much experienced in its immediate surroundings, within 200m, and the positive contribution that setting makes to significance is largely derived from this area. There would continue to be at least 300m of agricultural land between the farmhouse and the proposed substations and views of the farmhouse from directions other than the south-west would be unaffected.</p> <p>Nevertheless, this analysis still results in medium adverse magnitude for scenarios involving the western onshore substation.</p>
1.8.7	The Applicant	1	2	<p>Church of St Mary - Friston ES Appendix 24.7 [APP-519-520] considers that setting contributes to the significance of the Church of St Mary on 3 levels; immediate, short range, and long range. This considers that setting would only be adversely affected at long range, with the National Grid substation and the EA1N onshore substation entirely obstructing the sequential longer-range views of the church tower from the north when approaching Friston on the public footpath from Little Moor Farm. The appendix notes that the loss of this footpath and the views from it would diminish the</p> <p>a) The Applicants have considered the remarks made by Historic England (RR-047) and the opinion expressed by the ExA regarding the rural setting of the church. The Applicants have reviewed the assessment in Appendix 24.7 (APP-519 & APP-520) (from paragraph 91) and do not regard any changes regarding impact</p>



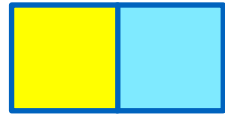
ExA. Question Ref.	Question addressed to	ExA. Question	Applicants' Response
		<p>contribution that setting makes to the significance of the church at this spatial scale.</p> <p>Historic England [RR-047] notes that the Church lies on the northern edge of the village and is appreciated in a rural and largely open landscape setting enabling views from the south and north. This enhances its prominence and adds to the appreciation of the building. The ExA note that despite the advent of modern agriculture and the presence of the existing transmission lines, it is not inconceivable when on site to consider that the landscape surrounding the Church to the north and forming a key part of its rural setting has not substantially changed in many years. In particular visible and guides travellers to the settlement. The Appendix acknowledges that the proposed development would entirely obstruct such long-range views of the Church but considers that this would amount to an adverse impact of low magnitude.</p> <p>a) Given the acknowledged impact of the proposals on the views of the Church from the north and its impact on the wider rural setting to the north of the heritage asset, do you maintain that this would amount to an adverse impact of a low magnitude?</p> <p>b) Does this amount to substantial harm? How important is this and how might the harm be mitigated?</p>	<p>significance conclusions as necessary.</p> <p>The analysis of the significance of the church (paragraphs 91-94 of Appendix 24.7) provides a comprehensive overview of significance, focussing on the contribution made by setting.</p> <p>The Applicants understanding of the predicted change in the setting of the church is supported by photomontages from six viewpoints (CH VP1, 2, 4 and 9; LVIA VP6 and 9 of Appendix 24.7 ((APP-519 & APP-520)). These provide representative views from all areas in the setting of the church that contribute to its significance where at least some visual change can be predicted.</p> <p>Detailed analysis of this predicted change (paragraphs 104-108 of Appendix 24.7) leads to the conclusion that it would adversely affect the significance of the church in only one area. This is the approach to the church along the PRoW from Little Moor Farm. In all other cases, the degree of change in landscape character around the</p>



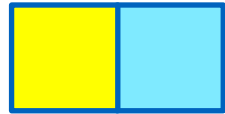
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			<p>church or visual competition in views of the church is not sufficient to materially affect the contribution that setting currently makes to significance.</p> <p>Given that the adverse impact on the significance of the church derives from this one specific aspect of change in setting, with all other components of significance unaffected, it is the Applicants' view that it is entirely reasonable to conclude that this is an adverse impact of low magnitude on the significance of the church.</p> <p>b) As noted in the Applicants' answer to ExA Q1.8.3, an adverse impact of low magnitude is equivalent to less than substantial harm. The predicted harm to the significance of the church is therefore less than substantial. Applying the magnitude criteria used in Table 24.8 of Chapter 24 Archaeology and Cultural Heritage (APP-072) substantial harm would occur if a predicted impact met the criteria for high adverse impacts:</p> <p><i>"Key elements of the asset's fabric and/or setting are lost or</i></p>



ExA. Question Ref.	Question addressed to	ExA. Question	Applicants' Response
			<p><i>fundamentally altered, such that the asset's heritage significance is lost or severely compromised."</i></p> <p>This is considered to be consistent with the guidance on the meaning of substantial harm provided in Planning Practice Guidance: Historic Environment (Paragraph: 018 Reference ID: 18a-018-20190723, Revision date: 23 07 2019).</p> <p>In the case of the Church of St Mary, Friston, it is predicted that there would be less than substantial harm and that the level of harm does not come close to the threshold of substantial harm.</p> <p>The design of the Projects has sought to minimise the level of harm to the church by maximising of the distance of the substations from the church and minimising the height of infrastructure within the substations. Planting proposed as part of the Outline Landscape Mitigation Plan (APP-401-403) would have a limited further mitigating effect in views to the north from the church. No further measures have been identified that would mitigate the principle adverse</p>



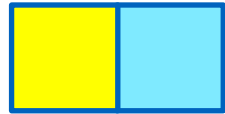
ExA. Question Ref.	Question addressed to	ExA. Question		Applicants' Response
				impact on the significance of the church, caused by the obstruction of the PRoW from Little Moor Farm.
1.8.8	The Applicant	1	2	<p>Church of St Mary - Friston Your representation [RR-47] states that you consider that the scale and appearance of the proposed developments would significantly change the character of the rural landscape setting of the Church, greatly impacting on key views of the church from the south, which would be seen against a backdrop of the sub-stations. The ExA note the responses of the Applicant to this point of view in their responses to the RR [AS-036] and note your view that the proposed works would remain subordinate to the Church.</p> <p>a) Provide further justification in support of your view that the contribution made by setting to the significance of the church in these views would not be materially affected. How would any harm from such views add to or contribute to harm caused by changes to the northern views of the Church?</p> <p>Quoting from RR-47, Historic England states that: <i>"It would also greatly impact on key views of the church from the south, which would be seen against a backdrop of the sub-stations."</i></p> <p>In the Applicants' assessment it is recognised that the proposed location of the substations to the north of the church created a potential for church and substations to be seen together in views from the south. Given that the Applicants had identified the visual prominence of the church as a component of its significance, it was possible that visual competition from the substation could adversely impact on this component of significance.</p> <p>Fieldwork led to the identification of various locations broadly to the south of the church where there were informative views of the church. Photomontages were prepared to illustrate the predicted visual change at representative viewpoints within each of these areas. These included relatively short-range views within the village (CH VP1 and LVIA VP6 of Appendix 24.7 (APP-519 &</p>



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				<p>APP-520)), approaching the village from the south on the Aldeburgh road (LVIA VP9) and approaching the village on a PRow from the south-west (CH VP2). In all four cases, if the photomontages are taken to their respective viewpoint locations, it is clear that whilst the highest structures within the substations might be visible, this is not sufficient to distract attention. The visual prominence of the church is preserved and the contribution made by this aspect of setting to the significance of the church is unaffected.</p> <p>Historic England does not define which views it considers to be “key views of the church from the south” but at no time has it drawn the Applicants' attention to viewpoints in addition to those that are illustrated in the ES. The Applicants maintain that the low level of visual change shown in the photomontages does not support the Historic England conclusion that the substations would ‘greatly impact’ on these views.</p>
1.8.9	The Applicant	1	2	<p>Mitigation</p> <p>ES Appendix 24.7 [APP-519-520] states that the design of the OLMP [APP- 401-403] has considered the maintenance of views towards Friston Church and the retention of historic farmhouses in an agricultural landscape.</p> <p>The Appendix notes that in the area to the north of the</p> <p>With regards to Little Moor Farm, paragraphs 151 and 152 of Appendix 24.7 (APP-519 & APP-520) state the following:</p> <p><i>“The OLMP proposes to reinstate lost field boundaries in the vicinity of Little Moor Farm, reducing field sizes and restoring the more</i></p>

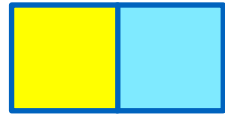


ExA. Question Ref.	Question addressed to	ExA. Question	Applicants' Response
		<p>onshore substations the OLMP has proposed the establishment of larger woodland blocks akin to the existing pattern of woodland blocks within the wider landscape and that planting is not proposed to enclose the historic farms in woodland, as this is not how they would have been experienced in the past. It also notes that 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 and that, in the area between the onshore substations and National Grid substation and Friston Moor, the OLMP primarily seeks to reinstate the historic (19th century) field pattern to enhance the setting of High House Farm and Little Moor Farm. The end aim of the OLMP is stated to minimise visibility of the onshore substations and National Grid substation whilst retaining the heritage assets in an appropriate setting.</p> <ul style="list-style-type: none"> The landscape at present is a largely open one, with far reaching views often possible. While the OLMP may seek to replace previous tree lined enclosures, it is not entirely clear how long such enclosures have been missing. Provide further justification for the proposed landscaping scheme in relation to the heritage assets, particularly in relation to Little Moor Farm and Woodside Farmhouse. 	<p><i>enclosed field pattern that was the setting for the farm in the 19th century. It also proposes to create a new belt of woodland between Little Moor Farm and Fristonmoor Barn that will create a degree of separation between the onshore substations and National Grid substation and the properties on Friston Moor.</i></p> <p><i>Taken together, these proposals would not fundamentally screen the setting of Little Moor Farm from the onshore substations and National Grid substation but would create a more enclosed landscape between the asset and the developments. This is illustrated by photomontages from CH VP3 and CH VP4 (Figures 8 and 9). CH VP3 illustrates the effectiveness of the proposed woodland belt between Little Moor Farm and High House Farm in screening the onshore substations and National Grid substation from view in this part of the setting, retaining a more rural agricultural character. In contrast, CH VP4 illustrates how the substations would continue to be prominent features from this part of the setting."</i></p> <p>With regards to Woodside Farmhouse, paragraph 161 of Appendix 24.7 (APP-519 & APP-520) states:</p>

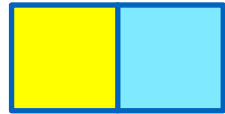


ExA. Question Ref.	Question addressed to	ExA. Question		Applicants' Response
				<i>"The OLMP proposes to reinstate and reinforce field boundaries with hedges in the immediate vicinity of Woodside Farm, reinstating its more enclosed agricultural setting. New woodland will be planted to the north, surrounding the onshore substations and National Grid substation on their south and west sides and creating a screen between the farm and the onshore substations and National Grid substation. It is considered that the loss of longer-range views to the north due to screening would not itself be an adverse impact as the slightly rising ground already restricts these views and the farm would be retained in an area of fields sufficient to provide an appropriate setting".</i>
1.8.10	The Applicant	1	2	<p>Mitigation – Church of St Mary It is acknowledged that proposals in the OLMP [APP-401-403] will not reduce the adverse impact caused by the loss of the views from the north and that, although new paths will be created to compensate for the loss of existing rights of way, none of these are likely to provide new views towards the church tower that might compensate for the loss of views from the north.</p> <p>a) Given this do you consider that the proposed mitigation provides any benefits to mitigating the key impact of the proposed developments upon the significance of the heritage asset?</p> <p>b) Were any alternative schemes considered,</p>

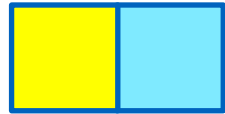
- a) The proposals contained in the **OLMP** (APP-401-403) do not provide any benefits that would mitigate for the loss of the sequential views towards the church when walking south along the PRoW from Little Moor Farm, although it is noted that effects are avoided on views of the church from the southern-most and closest section of the PRoW, which is where the church is prominent. As described in the OLMP, mitigation



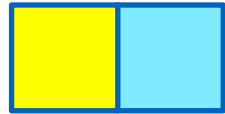
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		including the layout of buildings and compounds; creating new landforms or new landscape which would maintain views towards the Church	<p>planting seeks to be historically appropriate, through proposals to re-establish lost field boundaries and that seek to achieve layered screening through multiple lines of planting, with a mix of blocks, belts, tree lines and hedges, while maintaining the open setting / allowing the farming context of key receptors to be retained.</p> <p>b) From the outset, the site selection process (see Chapter 4 Site selection and Assessment of Alternatives (APP-052)) sought to avoid listed buildings and other heritage assets and ensure appropriate buffer distances through, for example, cable route refinement. Following the decision to locate the onshore substations at Friston, a process of micro-siting was undertaken (described in ES section 4.9.1.4) to refine the best location for the onshore substations and National Grid substation within the substation zone.</p> <p>Six alternative layouts to the preferred option were considered for the onshore substations and National</p>



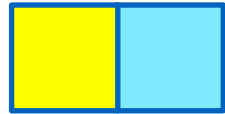
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			<p>Grid substation. These six alternatives are shown on Figures 4.8 to 4.13 of the ES (APP-088 to APP-093) (the preferred option is shown on Figure 4.14 of the ES (APP-094)). The six alternative layouts were presented to stakeholders at a site selection workshop with statutory consultees held in June 2018. The exercise was driven by the development considerations mapping used throughout preparation of the RAG Assessment for Onshore Substations Site Selection in the Sizewell Area (APP-443), survey data and desk-based data available.</p> <p>The primary driver for the co-location and micro-siting of the onshore substations and National Grid substation is landscape and visual impact. The proximity of Friston village to the south of the onshore substation location, and views from it toward the substation infrastructure, as well as views from surrounding isolated properties, all favour a co-location of all three substations in close proximity to one another. This</p>



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				<p>maximises the potential of the surrounding woodland areas (Grove Wood, Old World Wood and Laurel Covert) to provide natural screening from nearby visual receptors and to utilise these woodland blocks for a sympathetic planting scheme.</p> <p>The footprint of the substations are required to extend west across the PRow running through the onshore substation location. A PRow to the north of the onshore substations will be created under the Permanent Stopping Up of PRow Plan (APP-014) and Outline PRow Strategy (APP-581). The section of PRow running south with views towards the church will remain and will be unimpeded.</p>
1.8.11	The Applicant	1	2	<p>Assessment Criteria Tables</p> <p>Annex 1 to ES Appendix 24.7 [APP-519-520] contains tables to provide the criteria used in the assessments to define the importance of heritage assets, the magnitude of impact on heritage significance and the EIA significance of any effects.</p> <p>Under these tables Medium Heritage Importance (perceived Regional Importance) includes Grade II Listed Building or structures.</p> <p>The Applicants' justification for treating Grade II Listed Buildings as assets of regional importance comes from the treatment of these assets in relevant policies in NPS EN-1 and NPPF.</p> <p>The policy in NPS EN-1 is based, in part, around the principle that the more important a heritage asset, the greater the protection it should be afforded in policy:</p>



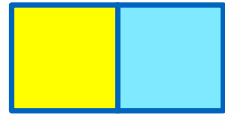
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		Provide further justification for your view that Grade II Listed Buildings are of regional importance, as opposed to being of national importance.	<p><i>“(the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be)”</i> (NPS, para 5.8.14).</p> <p>This is supported by NPPF:</p> <p><i>“(and the more important the asset, the greater the weight should be)”</i> (NPPF, para 193).</p> <p>This is reflected in separate policies for designated assets and non-designated assets where designated assets (and non-designated assets of equal importance) are afforded greater protection than other non-designated assets (for example compare NPPF paras 194-6 with 197).</p> <p>Both NPS EN-1 and NPPF also recognise a sliding scale of policy protection within designated assets with the higher levels of designation afforded greater protection. This is clear from a comparison of NPPF para 194a with 194b and the treatment of Grade II assets relative to Grade I and II* assets in NPS EN1 5.8.14. In both cases Grade II Listed Buildings are specifically afforded less protection because they are of lesser importance.</p> <p>This distinction in policy is reflected in our methodology by placing the Grade II assets</p>



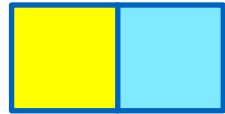
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				in a lower category of asset importance than the Grade I and II* assets. This distinction has no effect on findings of magnitude of impact but it can affect conclusions regarding significance of effect (as illustrated by the matrix at Table 24.9 of Chapter 24 Archaeology and Cultural Heritage (APP-072).
1.8.12	Historic England and other parties, including ESC	1	2	<p>Church of St Mary Your RR [RR-047] states you consider that the proposed developments would result in a very high level of harm to the significance of the grade II* listed Church of St Mary, and that you have concerns that the mitigation will bring about further changes to the setting of the church.</p> <ul style="list-style-type: none"> Do you consider that the location of the proposed substations and the proposed mitigation would cause substantial harm to the significance of this heritage asset?
1.8.13	The Applicant, SCC, ESC	1	2	<p>Parish Boundaries SCC and ESC consider that the proposed developments would result in the loss of the historic parish boundary between Friston and Knodishall and this has not been adequately addressed. The ExA note the responses of the Applicant to this point in their response to the RR [AS-036].</p> <p>How would the schemes overcome the loss of parish boundary PB1? Is it proposed to mitigate this loss?</p>
1.8.14	The Applicant	1	2	<p>Cumulative Impacts Friston Parish Council [RR-011] are of the view that the cumulative heritage impact on the cluster of listed</p>



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		<p>buildings which surround the substation site has been underestimated significantly and that there is only a visual assessment of setting. The ExA note the responses of the Applicant to this point in their response to the RR [AS-036]</p> <p>a) Consider the cumulative impact of the proposals on the identified heritage assets around the sites.</p> <p>b) Provide further information with reference to ES Appendix 24.7 [APP- 519-520] to respond to the view that setting has only been considered in a visual sense.</p>	<p><i>“Heritage impacts are underestimated significantly as is the cumulative heritage impact on the cluster of listed buildings which surround the substation site. • There is only a visual assessment of setting with little regard to wider identification and assessment of setting.”</i></p> <p>a) The setting assessment (Appendix 24.7 (APP-519-520)) addresses the cumulative impact of the Projects in its assessment scenario. The various listed buildings adjacent to the Projects (referred to by Friston Parish Council as a cluster) have been assessed individually and the ExA will take into account all identified impacts on significance. The Applicants do not consider that these listed buildings form a coherent cluster such that their combined heritage significance is greater than the sum of the individual assets.</p> <p>b) The setting of a heritage asset is defined as the surroundings in which a heritage asset is experienced (NPPF Annex 2: Glossary). Quoting from the Planning Practice Guidance:</p> <p><i>“The extent and importance of setting is often expressed by reference to</i></p>



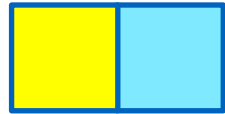
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			<p><i>the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.”</i></p> <p><i>(Paragraph: 013 Reference ID: 18a-013-20190723. Revision date: 23 07 2019).</i></p> <p>The potential relevance of other environmental factors was considered at the start of the assessment process, as reported at paragraphs 13 and 14 of Appendix 24.7 (APP-519-520). Quoting from paragraph 13:</p> <p><i>“Visual change is considered to be the only aspect of settings that would be changed in ways that could materially affect heritage significance. The presence of the onshore</i></p>



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		1	2	<p><i>infrastructure (described below) in the landscape has the potential to change the appearance and character of the settings as well as changing specific views within these settings that contribute to the significance of the assets."</i></p> <p>Paragraph 14 goes on to specifically discuss change in noise levels before excluding this from further consideration.</p> <p>This aspect of the scope of the setting assessment was made clear in the PEIR and no concerns were raised by consultees in Section 42 responses.</p> <p>It is the Applicants' view that the scope of the setting assessment has been sufficiently broad and the various ways that setting contributes to the significance of the assets under consideration have been appropriately identified.</p>
1.8.15	The Applicant, Historic England	1	2	<p>Offshore archaeology</p> <p>Historic England (HE) [RR-047] state that the large number of geophysical seabed anomalies recorded highlights the potential for significant historic environment features to be present, and that they are concerned to ensure that the Outline Offshore Archaeological Written</p> <p>Yes, the Offshore WSI can be updated to meet Historic England's concerns. The Applicants have been and will continue to engage with HE through the SoCG process.</p>



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		<p>Scheme of Investigation considers how the construction can be designed sensitively to take into account known and potential heritage assets.</p> <p>HE is concerned to ensure the appropriate depth for a continuous stratigraphy is incorporated into the planning of the geotechnical survey, with boreholes and vibrocores stored and maintained to maximise archaeological objectives. This is to mitigate impacts on archaeological deposits of high potential.</p> <p>The ExA note the responses of the applicants to this point of view in their responses to the RRs [AS-036] and the commitment to further archaeological assessment of any further geophysical data acquired for the projects</p> <p>To the Applicant:</p> <p>a) Respond further to the concerns of Historic England; can the Offshore WSI be adapted to meet their concerns during the examination and any consequent amendments incorporated into the Condition 13(g) Preconstruction plans and documentation of the dDCO?</p> <p>To Historic England:</p> <p>Provide any further comments to the responses of the applicants, should you wish to do so.</p>	A draft SoCG with HE (ExA.SoCG-16.D1.V1) has been submitted at Deadline 1.
1.8.16	The Applicant, SCC	<p>Onshore archaeology</p> <p>SCC [RR-007] note that the submitted level of information falls short of the level of information required by the County Archaeologist. The ExA note that engagement continues with the County archaeologists</p> <p>The ExA note the responses of the applicants to this</p>	The Applicants have broadly agreed the scope of further additional intrusive archaeological surveys to commence in 2021. During these surveys trial-trenches will not be sited across the historic trackway at the onshore substation location, or the



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		<p>point of view in their responses to the RRs [AS-036] and the commitment to engage with the County Archaeologists to minimise potential impacts regarding buried archaeological remains.</p> <ul style="list-style-type: none"> Outline additional necessary measures to be secured within the final Written Scheme of Investigation (Onshore) and pre-commencement archaeology execution plan 	<p>locations of Cable Ceiling End Compounds and proposed mitigation planting areas, unless otherwise agreed with the County Archaeologist (see section 4 of the Archaeology and Cultural Heritage Clarification Note submitted at Deadline 1 (ExA.AS-10.D1.V1)).</p> <p>It is the view of the Applicants that the commitment to 5% sampling (see section 4 of the Archaeology and Cultural Heritage Clarification Note (ExA.AS-10.D1.V1)) of the onshore development area plus ongoing consultation with the Councils' advisers, addresses the Councils' concerns that to date insufficient intrusive survey data has been collected. Further information on trial trenching is provided in the Pre-Construction Trial Trenching Report submitted by the Applicants at Deadline 1 (ExA.AS-13.D1.V1).</p> <p>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.</p>