

SPR EA1N and EA2 PROJECTS



DEADLINE 2 – COMMENTS ON EXQ1 RESPONSES - 1.8 HISTORIC ENVIRONMENT

Interested Party: SASES

IP Reference Nos. 20024106 and 20024110

Issue: 1

Reference	Question	Comment on Applicant' s Response
1.8.1	<p>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>SASES reserve the right to comment further on the relevance of NPPF.</p> <p>SASES do not agree with the applicant's assessment of impact magnitude - see SASES's Written Representation on Cultural Heritage, Chapter 5.</p>

*“Substantial harm to or loss of a grade II listed building park or garden should be exceptional”, 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).*

The National Planning Policy Framework (NPPF) states that:

*“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.”*
[ExA’s emphasis, para 193)

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).

- 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 built assets, ensuring that the appropriate policy tests are applied.
- d) If you do not agree with the ExAs’ policy summary above, please provide reasoned justification as to why not.

<p>1.8.3</p>	<p>Less than substantial harm</p> <p>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>	<p>SASES reserve the right to comment further on the relevance of NPPF.</p> <p>SASES do not agree with the Applicant's assessment of impact magnitude - see SASES's Written Representation on Cultural Heritage, Chapter 5.</p>
<p>1.8.4</p>	<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 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</p>	<p>SASES do not agree with the Applicant's assessment of impact magnitude - see SASES's Written Representation on Cultural Heritage, Chapter 5.</p> <p>SASES supports the County Archaeologist's Rapid Historic Landscape Assessment at Appendix 1 of the Local Impact Report and in particular that the PRoW referred to is a heritage asset.</p>

	<p>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>1.8.5</p>	<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>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>	<p>SASES do not agree with the Applicant's assessment of impact magnitude - see SASES's Written Representation on Cultural Heritage, Chapter 5.</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	<p>Woodside Farm</p> <p>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”. 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> <ul style="list-style-type: none"> Provide further justification for your view of limited magnitude of impact. 	SASES do not agree with the Applicant’s assessment of impact magnitude - see SASES’s Written Representation on Cultural Heritage, Chapter 5.
1.8.7	<p>Church of St Mary - Friston</p> <p>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 contribution that setting makes to the significance of the church at this spatial scale.</p>	SASES do not agree with the Applicant’s assessment of impact magnitude - see SASES’s Written Representation on Cultural Heritage, Chapter 5.

	<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 when walking south from Little Moor Farm the church tower is clearly 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>1.8.8</p>	<p>Church of St Mary - Friston</p> <p>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>The static visualisations do not capture the full extent of the impact on the setting to the north of the church.</p> <p>SASES do not agree with the Applicant's assessment of impact magnitude - see SASES's Written Representation on Cultural Heritage, Chapter 5.</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>1.8.9</p>	<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 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 	<p>SASES do not agree there can be adequate mitigation - see SASES's Written Representation on Cultural Heritage.</p>

	landscaping scheme in relation to the heritage assets, particularly in relation to Little Moor Farm and Woodside Farmhouse.	
1.8.10	<p>Mitigation – Church of St Mary</p> <p>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, including the layout of buildings and compounds; creating new landforms or new landscape which would maintain views towards the Church from the north, as stated to be sought in the design of the OLMP?</p>	<p>The Applicant’s site selection process was flawed see SASES Written Representation on Site Selection.</p> <p>In any event it does not justify the selection of the site as the ‘least bad’ option. “It is still bad, but it could be worse” is not a justification.</p>
1.8.13	<p>Parish Boundaries</p> <p>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> <ul style="list-style-type: none"> • How would the schemes overcome the loss of parish boundary PB1? Is it proposed to mitigate this loss? 	<p>The proposal to fund research on parish history is unnecessary. The ExA will recall that at OFH4 Marie Sznak quoted from a book on the history of Friston. SASES’s understanding is that a copy of “Friston – a Short History of a Suffolk Village” by Clarissa Thomas has been sent to PINS. This book was well researched by local historian to mark the new millennium. It contains details of the parish /hundred boundary and its origins back to the liberty of Saint Etheldreda as far back as 673AD.</p>

		<p>The proposal of “interpretation panels” would further urbanise/industrialise what was a rural landscape and would not be well received by residents.</p>
<p>1.8.14</p>	<p>Cumulative Impacts</p> <p>Friston Parish Council [RR-011] are of the view that the cumulative heritage impact on the cluster of listed 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>The Applicant does not consider that the affected buildings as a cluster and so assesses them separately. However, their ES highlights the historical links between some of the properties which is contradictory. See further SASES Written Representation on Cultural Heritage, chapter 5.</p> <p>The Applicant has rehearsed its arguments for visual change being the only major impact. SASES contested this. See SASES Written Representation on Cultural Heritage, chapter 5.</p>