

EAST OF ENGLAND OFFICE

Rynd Smith and the East Anglia One North and Two Case Team Our ref: PL00088303 & PL00541702

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Planning Act 2008, Scottish Power Renewables, Proposed East Anglia One North (EA1N) and Two (EA2) Offshore Windfarm**Historic England Deadline 3 Response**

Dear Mr Smith

The Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England are the government's advisor on the historic environment and we provide independent advice on heritage matters. We have a duty to conserve, as well as promote public understanding and enjoyment of the historic environment.

Following detailed discussion at the issue specific hearing on 2nd and 3rd December we committed to submitting a further document to the enquiry. This is a letter to Scottish Power dated November 2018 and is attached. Further comment in relation the impact of the development on the significance of t Mary Church also follows below.

Historic England Letter dated Nov 2018

We had previously raised concerns at Expert Topic Group meetings in 2018 with regards to the historic environment weighting in the RAG assessment. Notably that the absence of detailed assessment of the significance St Marys Church, Friston at the RAG siting stage had led to an under informed site weighting . We then provided a written advice to the applicant following the 3.5 Phase Consultation which was submitted to HE directly in 2018. In this letter of 09th

November 2018 to the applicant we raised issues with regards to the siting at Friston as opposed to Broom Covert.

Following discussion at the ISH we felt it was important to note that we had raised clear concerns with the applicant in relation to the potential impact upon the historic environment at Friston, and in particular St Marys Church from the outset. In particular that we identified that the landscape setting contributed to the significance and appreciation of the church and complemented the spiritual values and sense of place.

In spite of the early discussion it continues to be a concern that this location was still considered favourable, and that given our advice more was not been done by the applicant to identify harm in relation to the church and then to seek ways better and more effect ways of reducing the impact of the development on the historic environment.

East Suffolk Council and Suffolk County Council Joint Local Impact Report

Just prior to the ISH we were also made aware of East Suffolk Councils and Suffolk County Council Joint Local Impact Report, dated November 2020. We have now had time to consider this in more detail, in particular the Built Heritage Chapter (12. pp67).

As well as considering the significance of St Marys Church the councils have also considered the grade II listed buildings around the substation site, and the relationship of these assets to each other, and the landscape. Over all we consider this to be a sound piece of work and confirm we broadly support the conclusion that report has come to in relation to the impact of the development on the significance of these assets and the degree of harm.

We particularly note at 12.11 the references to the parish and hundred boundary and the high degree of concern expressed in relation to the severing of an important historical route way between the outer and inner parish, and the loss of the key views of the church from the common land to the north.

We have also identified in our Written Representation the views from the north of the as one of the critical issues with regards to the impact of the development overall and the additional research provided by the council and to some extent the applicant give further rise for concern in relation to both the contribution that this area makes to the significance of the church and the harm that would be caused to this significance by the development.

As considered by the NPPF and the setting of heritage assets (Good Practice Advice in Planning Note 3) is that the settings of heritage assets can change over time. We are also aware that our understanding of significance can also change as further analysis is undertaken and information emerges that helps our understanding of the value of a place or an asset. We feel it is therefore important to note that we feel that the consideration of the land to the north of the church has increased, and that through this research we better understand the important contribution it makes to its significance of the church.

We are also aware that dispersed settlements such as that visible at Friston are very characteristic of the way in which villages developed in this part of Suffolk. Preserved patterns of dispersed buildings and other historic landscape features such as moats and farmsteads connect to the centre via trackway and foot paths are important survivals and indicators of historic settlement. Individual listed buildings to some extent cannot just be seen as isolated buildings in the landscape and this legibility and our ability to read and understand the landscape contributes much to our understanding of assets and their sense of place.

We also therefore feel it would be reasonable to argue in this case, and as considered in other planning decisions that that harm to a number of individual designated heritage assets may accumulate. We think this is particularly apparent where it can be argued that these assets are connected. A development might result in harm to a number of designated heritage assets when taken individually, and that when the impact is considered on a group of interconnected assets this would amount to an accumulation of harm. This should include even less tangible and non-designated heritage assets such as landscapes, fields, boundaries and trackways.

We also confirm that following comments provided at the ISH by the Council, we remain concerned about the potential efficacy of the proposed mitigation in relation to reducing heritage harm, particularly the proposed planting scheme presented by the applicant.

Conclusion

Overall the church at Friston remains one of the key buildings in the community and over many centuries the church has played a key role in the life of the parish. Users of the church will have come from all areas of the parish, and this is evidence by the relationship between the church and the war memorial for example, but also about how a public building is experience and used by a community. It is also through the relationship of the church to the landscape that surrounds it, in particular this key area of land to the north where the development would be sited.

We remain of the view that the development would be harmful to the significance of the church as a highly designated heritage asset in its own right, and this would be a high degree of less than substantial harm. This is explored fully in our written representation in relation to the development of the substations individually and in combination, and we find no reason following the evaluation of the additional evidence to change our view.

We are however conscious that the significance of the of the church is not just about views, and it is our appreciation of the wider setting of the church that has emerged though the development process, and in particular the relationship of the church and other heritage assets through their landscape connections, and therefore the degree to which their setting is related. The accumulation of harm to a number of connected heritage assets is something that we feel should be given due consideration and weight.

If there are any material changes to the proposals, or you would like further clarification in relation to our advice, please contact us.

Yours sincerely

Will Fletcher

Dr Will Fletcher

Inspector of Ancient Monuments
