



Historic England

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Dear EA1N team and EA2 teams,

Phase 3.5 East Anglia ONE North and East Anglia TWO

Thank you for your letter dated 18th July 2018 seeking Historic England's advice on stage 3.5 of the consultation process for EA1N and EA2. We very much appreciate that you have provided early stage visualisation of both sites and a report titled 'Phase 3.5 Consultation Information', and it was helpful to discuss the proposals with you at our offices last month. We are aware this phase of consultation is in addition to the Scoping phase on which we have already commented. We have visited both sites and also undertaken some initial analysis. This advice is at present given only in relation to the on-shore elements of the project as set out in your phase 3.5 report; however we also continue to maintain our remit for maritime archaeology in the English area of the UK Territorial Sea as set out in the National Heritage Act (2002).

Historic England Advice

The applicant Scottish Power Renewables (SPR) is seeking to develop two offshore wind farms known as East Anglia TWO and ONE North, with associated infrastructure. East Anglia ONE North development will comprise an array of up to 67 wind turbines, and the East Anglia TWO development an array of up to 75 turbines with electricity delivered to the shore via export cables. The applicant proposes where possible to share the proposed infrastructure with East Anglia ONE North and two scenarios for delivery are outlined in Chapter 5 of the 3.5 Consultation report. Details of the size, final design and specification for the turbines and infrastructure are not known at this stage of the project, however as part of this the applicant will



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require two new electricity substations and in order to connect to the National Grid, a new National Grid substation. At present the proposal is seeking to co-locate the new infrastructure.

We are aware that the substation proposals and access arrangements are at present indicative and that the on-shore landfall and cabling route have not yet been determined. This new approach seeks comments on two potential locations for the substation for the development, a site to the north of Friston and an alternative location to the east of Leiston known as Broom Covert. The consultation also includes an updated onshore study area (see 3.5 Information Fig: 1), to cover the new consultation area at Broom Covert, and any land needed as compensatory habitat.

As you will be aware from our previous letter, Historic England's response is limited to the potential impact of the development on the historic environment. We have focused this initial advice on the highly designated heritage assets within our statutory remit, and on the archaeological footprint of the cable corridor. Our advice is given in relation to the information available at this time, and may be subject to change as our understanding of the impact on heritage assets changes.

Grove Wood, Friston (see 3.5 Information Fig: 2)

Friston is a small village lying to the west and east of the Saxmundham Road in a rural landscape. It contains two highly designated heritage assets, the Church of St. Mary and a site known as the Friston post mill. Both are listed grade II*.

Like many rural parish churches, St. Mary's is the result of several phases of building over the centuries. It contains surviving fabric of the eleventh and twelfth centuries, although the main body of the church was built in the fourteenth and fifteenth centuries. It then underwent several further phases of work including restorations in the late nineteenth and twentieth centuries. This work illustrates ecclesiastical architectural design and patterns of worship and also reflects the significance role of the church within the community over the centuries.

The church is positioned on the northern edge of the village set within its churchyard with the Reeve Farm to the east. To the south there are fields between the churchyard and the houses along Grove Road. To the north is a rural agricultural landscape. Although the church is within the village, it is appreciated in a rural and quite open landscape setting. The church tower (rebuilt in c.1900) is not particularly tall, but it rises above the other buildings in the village which are mainly modest houses of one and a half to two storeys. There are views of the church from the south from the village green and Grove Road and from the land to the north. The church stands out in the village as the principal building by virtue of its scale, quality



and the space around the building. The landscape setting contributes to the significance and appreciation of the building and complements the spiritual values of the place.

The post mill lies on the western side of the village. It dates from the early nineteenth century and was modified some 60 years later. Its form articulates this evolution and the listing description notes it is judged to be one of the finest post mills in the world. It is encircled by the village but as one of the tallest post mills in the country it is visible in places above the houses and potentially in longer views from the surrounding area.

The proposed location of the substation is in the rural landscape to the north of the Church of St. Mary at Grove Wood. A number of visualisations have been produced from the surrounding area. Viewpoint 4 is taken from Church Road just to the north of the church. The current view is across the open landscape although the power line which crosses the countryside is visible. The visualisation shows the scale and character of the substation. This industrial plant starkly contrasts with the natural landscape and is visible across much of the view between the two existing pairs of pylons. This would dramatically change the character of the rural landscape. Viewpoint 5 shows the view from the village green where the existing view illustrates how the church tower acts as a landmark rising above the houses. From here parts of the substation would be visible over the roofs of the houses. Although two pylons are visible in the distance, the substation would introduce a further alien element to the rural context of the church. It would erode the rural setting of the church and compromise the appreciation of the building. This would result in a high level of harm to the significance of the grade II* building.

At present there are no visualisations from the south side of the village to illustrate whether there might be longer distance views where the church and post mill are seen together with the substation, and this would need to be considered in due course. If the development is visible in these views it would further detract from the significance of these buildings.

Broom Covert, Sizewell (see 3.5 Information Fig: 3)

Broom Covert is an area of land situated to the east of Leiston and to the west of the EDF Sizewell estate. It was previously agricultural land but is currently earmarked as mitigation land for the Sizewell project and has been prepared for this purpose. Two offshore wind farm National Grid sub-stations already exist at this location, and serve previously consented and completed windfarm projects. The 3.5 Consultation Information provides four viewpoints taken from locations around this site and close to the proposed development. There are however no specific viewpoints from further out, and this information is therefore of limited scope in relation to the known heritage



assets. We have therefore also used additional information gained during a recent site visit as part of our assessment.

In term of heritage assets there are no designated heritage assets with the proposed development area. The closest highly designated asset is a Scheduled Monument situated to the south of the site on Aldringham Walks known as the '*Bowl barrow on Aldringham Common, 300m east of Stone House*', (List Entry Number: 1011440) which is approximately 1.5 km from the indicative development area. This is an important surviving prehistoric feature that relates to the use of this former heathland landscape in the prehistoric period. It survives as a relatively slight mound situated within the golf course, and although the power cables that cross between the monument and the development site are visible in the distance, the gentle undulating heath landscape means the view of the development its self is largely obscured. The monument is therefore likely to be maintained in its current setting.

Further from the development lie the ruins of 'Leiston Abbey (second site) and moated site' (List Entry Number: 1014520) which is both a Scheduled Monument and is Listed at Grade I. This is a highly significant which is the second of two abbeys built by the Premonstratensian monks in the area, after the first in the marshes at Minsmere was abandoned. The ruins are among the most picturesque in Suffolk and open to the public daily as a visitor attraction. Although it survives in good condition we are aware it is some way to the north west and again although the power cables close to the development site are visible in the distance the undulating nature of the landscape appears to obscure views of the development self itself.

We are also aware that there are also two highly graded assets within the town of Leiston, including the Long Shop Museum and Church of St Margret which are both listed at Grade II*. However, situated in the western side of Leiston the significance of these assets would appear not to be impacted by a development at Broom Covert which is to the east of the town.

The conservation area at Thorpeness which lies further to the south and east of the development area is perhaps more of a concern. The conservation area designation respects the importance of the development as a holiday resort in the early 20th Century and are aware of the a number of prominent Grade II listed building situated in the village, which includes the country club and the former water tower known as the House in the Clouds. Similarly to the barrow the development is some way from the town and the landscape between the developments appears to obscure views of the development self itself, however further full assessment of the significance of the designated heritage assets in this area would be needed to confirm the level of visibility and whether any mitigation would be necessary. We are also aware that there are a number of grade II listed assets in within the study area, which include



other buildings in Leiston and the Watch Tower on the coast at Sizewell Gap. A similar high quality assessment would be needed for these assets should this site be taken forward by the applicant.

We have however come to the conclusion that there are unlikely to be any significant views of the development from the highly designated assets. We have noted that there may be some longer range or glimpsed views from places such as from Leiston Abbey and the edge of the conservation area at Thorpness, and from the grade II listed building that are closer to the development site, and this would need to be fully assessed. It is however likely that if this location were chosen then the impact on individual highly designated heritage assets through a development within their setting is likely to be less than significant in EIA terms.

Legislative and Policy Context (NPPF)

Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant planning permission the local authority shall have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they may possess.

The purpose of the planning system is defined in the NPPF as to contribute to sustainable development. That is to meet the needs of the present without compromising the ability of future generations to meet their needs, paragraph 7. To achieve this, the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways: economic, social and environmental objectives, paragraph 8.

The NPPF sets out the desirability of sustaining and enhancing the significance of heritage assets, paragraph 192. It establishes that great weight should be given to an asset's conservation and the more important that asset, the greater that weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance, paragraph 193. Any harm should require clear and convincing justification, paragraph 194. Local planning authorities should look for opportunities for new development in the setting of heritage assets to enhance or better reveal their significance, paragraph 200. Where a proposal would lead to less than substantial harm, this should be weighed against the public benefits of the proposal, paragraph 196.

The Good Practice Advice Note 3 covers setting and views and highlights the issues that should be considered and a staged approach to decision making which we would recommend is followed.



Historic England's Position

We are aware that the proposals are at present indicative and that the design of the substations is likely to be subject to modifications as the details are refined. We are also aware of that the visualisation is limited and representative. Likewise the heritage assets at both locations have not been subject to a full analysis.

We are however clear in our view that if the Grove Wood site at Friston were chosen the development would result in harm to the significance of the grade II* church, and potentially harm to the Mill through a development within their setting. This would be significant in EIA terms and would be harm of a high degree in terms of planning policy. If the Friston site was to be taken forward, then it is likely we would consider an objection on heritage ground. In addition, the applicant would need to ensure there was a robust assessment of the impact upon the site and that this provided the clear and convincing justification that is required by the relevant planning policies.

In relation to the Broom Covert site we have come to the conclusion that development at this location is unlikely to be visible from the highly designated heritage assets and therefore the impact on the assets would be less than significant in EIA terms, and there would be less harm to the significance of these assets as determined by planning policy. This site and all heritage assets would need to be subject to full analysis, however we would favour the Broom Covert site in Leiston over the Grove Wood Site at Friston.

We are also aware that there are other considerable advantages to the Broom Covert site; in particular this would mean a significantly reduced impact on non-designated heritage assets because the cable corridor would also be reduced in length. The lessening of the impact on buried archaeological remains would be an important consideration. As we have referred to in previous advice we are also aware that the longer cable route to Friston also has a significant risk of harm to the significance of other heritage assets along its route through permanent changes to their setting. Most prominent among these would be the grade II listed building known as 'Raidsend' or Aldringham Court. The shorter route option would also eliminate this risk.

There is also a benefit in planning terms of bringing elements of major infrastructure together if it can be demonstrated to result in less overall harm to the historic environment. We are aware there are other designation and issues in relation to the planning and the natural environment, and in relation to the location of Broom Covert in the AONB. Whilst we recognise any planning decision must balance these concerns, we have provided an opinion based on our remit for the historic environment and from that perspective the Broom Covert site has a number of advantages and would be our preferred option.

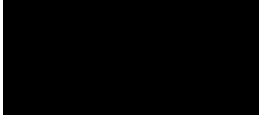




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Please do not hesitate to contact me if you would like to discuss this advice or would like further information.

Yours sincerely



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Inspector of Historic Buildings and Area



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