



**SCOTTISHPOWER
RENEWABLES**

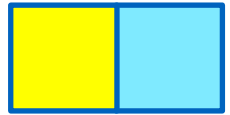
East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on Historic England's Deadline 3 Submission

Applicant: East Anglia TWO and East Anglia ONE North Limited
Document Reference: ExA.AS-19.D4.V1
SPR Reference: EA1N_EA2-DWF-ENV-REP-IBR-001199

Date: 13th January 2021
Revision: Version 1
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Applicable to East Anglia ONE North and East Anglia TWO



Revision Summary

Rev	Date	Prepared by	Checked by	Approved by
01	13/01/2021	Paolo Pizzolla	Lesley Jamieson / Ian Mackay	Rich Morris

Description of Revisions

Rev	Page	Section	Description
01	n/a	n/a	Final for Deadline 4 Submission

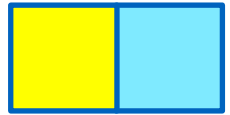
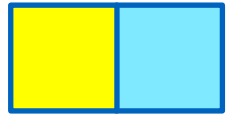


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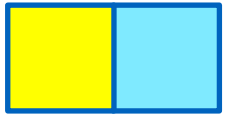
Glossary of Acronyms

AONB	Area of Outstanding Natural Beauty
OLEMS	Outline Landscape and Ecological Management Strategy
RAG	Red Amber Green

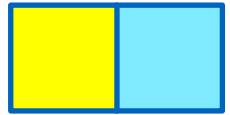


Glossary of Terminology

Applicants	East Anglia TWO Limited / East Anglia ONE North Limited
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order but will be National Grid owned assets.
National Grid overhead line realignment works	Works required to upgrade the existing electricity pylons and overhead lines (including cable sealing end compounds and cable sealing end (with circuit breaker) compound) to transport electricity from the National Grid substation to the national electricity grid.
National Grid overhead line realignment works area	The proposed area for National Grid overhead line realignment works.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO project / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.
Onshore cable corridor	The corridor within which the onshore cable route will be located.
Onshore cable route	This is the construction swathe within the onshore cable corridor which would contain onshore cables as well as temporary ground required for construction which includes cable trenches, haul road and spoil storage areas.
Onshore development area	The area in which the landfall, onshore cable corridor, onshore substation, landscaping and ecological mitigation areas, temporary construction facilities (such as access roads and construction consolidation sites), and the National Grid Infrastructure will be located.
Onshore substation	The East Anglia TWO / East Anglia ONE North substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.
Onshore substation location	The proposed location of the onshore substation for the proposed East Anglia TWO project / East Anglia ONE North project.



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

1. This document presents the Applicants' comments on Historic England's Deadline 3 submission (REP3-107).
2. This document is applicable to both the East Anglia ONE North and East Anglia TWO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23rd December 2019. Whilst for completeness of the record this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it again for the other project.



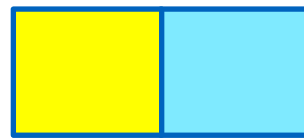
ID	HE Comment	Applicants' Response
Introduction		
1	<p>The Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England are the government's advisor on the historic environment and we provide independent advice on heritage matters. We have a duty to conserve, as well as promote public understanding and enjoyment of the historic environment.</p> <p>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 St Mary Church also follows below.</p>	Noted.
Historic England Letter dated Nov 2018		
2	<p>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 9th November 2018 to the applicant we raised issues with regards to the siting at Friston as opposed to Broom Covert.</p> <p>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.</p>	<p>With reference to Appendix 4.3 Suffolk Coasts and Heaths AONB Impact Appraisal of the ES (APP-444), onshore substations located at Grove Wood would have notably better regard to the nationally protected landscape status of the Suffolk Coasts and Heaths Area of Outstanding Natural Beauty (AONB). 'Exceptional circumstances' and 'public interest' in line with paragraph 5.9.10 of the National Policy Statement for Energy EN1 would need to be demonstrated if the substations were to be sited within the AONB (e.g. Broom Covert, Sizewell) or in locations that can be considered as forming parts of the 'setting' of the AONB. Development at Grove Wood is unlikely to have any significant effects on the special quality of the nationally protected AONB landscape.</p> <p>The Red Amber Green (RAG) assessment was an initial tool used to enable the clear and direct comparison of sites based on common criteria. No weighting was applied to the development considerations used to</p>



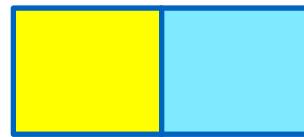
ID	HE Comment	Applicants' Response
	<p>In spite of the early discussion it continues to be a concern that this location was still considered favourable, and that given our advice more was not been done by the applicant to identify harm in relation to the church and then to seek ways better and more effect ways of reducing the impact of the development on the historic environment.</p>	<p>ensure that no particular environmental parameters were prioritised and that all were treated as equally important. Ultimately the RAG assessment did not identify the chosen onshore substation locations, but allowed a number of locations to be compared and the most acceptable to progress to more detailed assessment. At the time of completing the Phase 3.5 consultation the Applicants were considering the baseline cultural heritage information gathered and presented in the Archaeology and Cultural Heritage Desk Based Assessment (APP-514). Section 3.8 of (APP-514) includes a setting study, while Section 4.3 presents an assessment of effects from changes to setting.</p> <p>With respect to additional work undertaken by the Applicants, further clarity regarding potential harm to the church has been provided in the Archaeology and Cultural Heritage Clarification Note (REP1-021) submitted at Deadline 1.</p> <p>Additional changes have been made to the design of the onshore substations and National Grid substation which are described in the Project Update Note (REP2-007) and Deadline 3 Project Update Note (REP3-052).</p> <p>The Applicants also refer to the Heritage Assessment Addendum (document reference ExA.AS-11.D4.V1) and accompanying photomontages submitted at Deadline 4. This reviews the design changes set out in (REP2-007) and (REP3-052) (e.g. lowering of equipment / buildings heights) along with the greater retention of existing woodland around the onshore substations and additional planting included within the Outline Landscape and Ecological Management Strategy (OLEMS) (REP3-030) submitted at Deadline 3. These measures have led to a reduction in the influence of the onshore substations and National Grid substation in views in proximity to St Marys Church and the graveyard and</p>



ID	HE Comment	Applicants' Response
		also reduce the influence in views of St Marys Church from in and across Friston.
East Suffolk Council and Suffolk County Council Joint Local Impact Report		
3	<p>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).</p> <p>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. Overall 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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>The Applicants refer to <i>Applicants' Responses to Examining Authority's Written Questions Volume 10 - 1.8 Historic Environment</i> (REP1-113) submitted at Deadline 1, in particular their response to Q1.8.14 regarding clustering and cumulative impacts. The Applicants also refer to their responses in <i>Applicants' Comments on Local Impact Reports</i> (REP2-013) submitted at Deadline 2.</p> <p>Since the submission of REP3-107 the Applicants have further explored the effectiveness of mitigation with Historic England through the Statement of Common Ground process. The design changes set out in (REP2-007) and (REP3-052) have been reviewed with Historic England, along with the revised visualisations submitted at Deadline 3 which show the additional planting now included within the <i>OLEMS</i> (REP3-030). Further planting north of the National Grid substation has been discussed; this has been included in the revised Outline Landscape Management Plan (document reference ExA.AS-14.D4.V1) and considered in the <i>Heritage Assessment Addendum</i> (document reference ExA.AS-11.D4.V1), both submitted at Deadline 4.</p>



ID	HE Comment	Applicants' Response
	<p>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.</p> <p>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.</p> <p>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.</p> <p>We also confirm that following comments provided at the ISH by the Council, we remain concerned about the potential efficacy of the proposed mitigation</p>	



ID	HE Comment	Applicants' Response
	in relation to reducing heritage harm, particularly the proposed planting scheme presented by the applicant.	
Conclusion		
4	<p>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.</p> <p>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.</p> <p>If there are any material changes to the proposals, or you would like further clarification in relation to our advice, please contact us.</p>	<p>Noted. The Applicants refer to <i>Applicants' Responses to Examining Authority's Written Questions Volume 10 - 1.8 Historic Environment</i> (REP1-113) submitted at Deadline 1, in particular their response to Q1.8.14 regarding clustering and cumulative impacts.</p> <p>Please also see the <i>Heritage Assessment Addendum</i> and accompanying photomontages submitted at Deadline 4 (document reference ExA.AS-11.D4.V1).</p>