

EAST OF ENGLAND OFFICE

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

By Email Only

EastAngliaOneNorth@planninginspectorate.gov.uk

EastAngliaTwo@planninginspectorate.gov.uk

Your ref: EN010077 & EN010078

Telephone 01223 582710

24th February 2021

Planning Act 2008, Scottish Power Renewables, Proposed East Anglia One North (EA1N) and Two (EA2) Offshore Windfarms

Historic England Deadline 6 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.

Conformation of Historic England Comments at Deadline 6 24th Feb 2021.**1) Question 2.8.9: OLEMS**

a) What effect, if any would do you think the proposed landscaping contained in the revised OLEMS [REP3-030] would have on any harm caused to the significance of the church by the proposals?

b) Could increased landscaping have an adverse effect by, for instance, altering the setting of the Church?

Historic England Response:

24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Overall Historic England appreciate the efforts that the applicant has made to establish mitigation and a planting scheme that is in keeping with the landscape and the changes that have been made to improve this element of scheme in this iteration of the OLEMS. This does not however change our fundamental concern about the impact of the scheme on the setting of the church, or our findings in relation to the harm to the significance of the church of St Marys at Friston.

We are of the view that the development of the sub-stations both individually and in conjunction with each other and with the NGET sub-station scheme are of such a magnitude and scale that they would still result in a high degree of harm to the significance of the designated asset. This is from the restrictions and changes to the views of the church, and the landscape scale changes of what will be physically seen in the area to the north of the church, the loss of key views from the immediate setting of the church, the loss of ancestral footpaths to the north and the loss of the church as a marker in the landscape in views from the north towards Friston.

We are mindful that the screen planting is partly to provide mitigation for the historic environment. By seeking to mitigate the effects of the scheme, because it is too large and too close to the church, the proposal includes a significant amount of new planting. Whilst we are aware of the potential environmental benefit, we have also concluded that the planting would be likely to have a harmful effect on the historic environment in its own right. Although the mitigation planting seeks to replicate the natural landscape, it will continue to introduce new elements of planting to the landscape that were not previously there, and further reducing the prominence and dominance of the church in the landscape particularly in key views from the lands that forms part of this setting.

The changes made in this OLEMS plan, retention of existing woodland and changes to the screen the development from the north in particular are welcomed, however these are relatively small changes to the overall scheme and do not affect our overall fundamental objection.

This is particularly apparent in those key views of the Church from Moor Farm, where the development would cut across the footpath which runs from Friston to Moor Farm to the north of the church. The use of planting to here to screen the development would have the effect of screening out the substation in the immediate foreground but, because it would continue to block and restrict the key views of the church and remove those views it remains harmful.

Both the scheme and the mitigation are harmful, and because one seeks to soften or reduce the dominance of the other does not necessarily reduce the overall effect of harm. Again because it is 'natural' it is not necessarily appropriate in relation to the setting of an historic asset. Retention of existing planting is likely to increase the screening again in some areas however the overall reduction of impacts is relative modest overall, and would in our view be negligible in relation to reducing the overall effects of the scheme on the significance of the church.

Again we feel it is also worth stating that we maintain a concerns as to whether the planting would be effective in its job of mitigating the impact of the development on the significance of the church, this is due to the concerns raised by council and other in relation to growth rates. It the OLEMS proposal is not effective, and would not end up screening the development then the overall harm would be exacerbated for longer and would be more damaging. We are aware the developer have sought measures to increase the success of the planting, and we are aware this is not our area of expertise, however the failure of the scheme or the failure to achieve the projected growth rates would result in an increased level of harm to the historic environment.

2) Question 2.8.9: Statement of Common Ground – Offshore

The applicants state [REP5-012] that the updated SoCG [REP5-032] for offshore matters is all agreed subject to your review of the updated draft DCO submitted at Deadline 5. Confirm (or otherwise) that all offshore matters as in the SoCG [REP5-032] are agreed.

Historic England Response:

As detailed in our Deadline 5 written submission, we are currently discussing with the Applicant proposed amendments to the DML conditions 'Preconstruction plans and documentation' Schedule 13, Part 2, 17(1)(g)(vi) & Schedule 14, Part 2, 13(1)(g)(vii).

Subject to this matter being resolved we envisage an updated Statement of Common Ground can be submitted by the Applicant for Deadline 7.

Historic England conclusion and Position

As set out in our previous letter although we continue to welcome the changes the applicant would make to the scheme Historic England do not consider this is sufficient to alter our overall

position and we maintain our in principle objection to the sub-station elements of both developments and the NGET infrastructure.

If there are any further 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

██████████@historicengland.org.uk