



Historic England

EAST OF ENGLAND OFFICE

Mr Rynd Smith and the East Anglia One North and Two  
Case Team

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

Historic England response to ExQs 3: Question 3.8.4

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.

Question to: The Applicants, East Suffolk Council, Suffolk County Council, Historic England, and any other interested IPs.

### Cumulative Impacts

*The ExAs note in the Clarification Note – Archaeology and Cultural Heritage [REP1-021] that the Applicants acknowledge that the public right of way trackway to the north of the Church of St Mary which follows the parish and Hundred boundary should be considered as a heritage asset in its own right. The trackway/public right of way links the Church of St Mary, a Grade II\* listed building to Little Moor Farm, a Grade II listed building.*



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- *Given the link that the acknowledged (undesigned) heritage asset trackway provides between the Church and Little Moor Farm, does this increase the significance of the two designated heritage assets, either individually or cumulatively (or both)?*
- *If yes, how would this significance be affected by the proposed projects?*

## Relevant Policies

National Policy Statement for Renewable Energy Infrastructure (EN-3)

5.8.4 There are heritage assets with archaeological interest that are not currently designated as scheduled monuments, but which are demonstrably of equivalent significance. These include:

- those that have yet to be formally assessed for designation;
- those that have been assessed as being designatable but which the Secretary of State has decided not to designate; and
- those that are incapable of being designated by virtue of being outside the scope of the Ancient Monuments and Archaeological Areas Act 1979.

5.8.5 The absence of designation for such heritage assets does not indicate lower significance. If the evidence before the IPC indicates to it that a non designated heritage asset of the type described in 5.8.4 may be affected by the proposed development, then the heritage asset should be considered subject to the same policy considerations as those that apply to designated heritage assets.

## Historic England Advice

The feature in question is the public right of way and trackway that follows the parish and Hundred boundary and links the Church of St Mary with Little Moor Farm and Friston Moor. We have highlighted this feature in previous correspondence as having been an important historical route between the main village of Friston and the outlying northern areas of Friston Moor. It links the moated manor sites to the north of the village with the church. These surviving features, church, boundaries and moats are features of the pre modern medieval landscape and form a tangible link to the past. This feature has been better described and identified in the East Suffolk Council Local Impact Report and other submissions.

As is known from research elsewhere in Suffolk, key boundaries such as hundred and parish boundaries can date to the Saxon period or in some cases even earlier. The trackway and



boundary could therefore have existed in this landscape for centuries and have survived against landscape reorganisation and agricultural change.

The trackway and boundary can demonstrate a number of heritage values– it is a land divisions of significant age, it is an administrative boundary and is of considerable value in terms of the history of the parish, and the relationship between the parish, the church and the land to the north. It can therefore demonstrate good historic and communal values. As a physical feature it can also demonstrate evidential values.

We acknowledge that it is unlikely an asset like this would meet the criteria for designation under the terms of DCMS guidelines (DCMS 2013) however it clearly demonstrates physical attributes as well as more intangible heritage and social values, and we would agree that this should be considered as a non designated heritage asset. It clearly demonstrates high values and therefore has a high overall significance.

In our view this asset would be considered under the policy 5.8.4 of the National Policy Statement for Renewable Energy Infrastructure (EN-3, which covers ‘heritage assets with archaeological interest that are not currently designated as scheduled monuments, but which are demonstrably of equivalent significance’, in particular bullet point three which the policy says should include ‘those that are incapable of being designated by virtue of being outside the scope of the Ancient Monuments and Archaeological Areas Act 1979.’ As directed by the NPS, policy 5.8.5 then comes into consideration.

## Impact

In our advice and in line with our remit, we have primarily considered the impact of the development on the significance of the grade II \* church of St Mary’s in Friston. We have already highlighted how important the area to the north of St Marys church is for the setting of the highly graded church and that the church draws part of its significance from its relationship to the northern part of the parish. We have, however, not assessed the relationship and contribution to the grade II listed Little Moor Farm.

We have highlighted that one of the key views of the church is from the footpath associated with this boundary and track looking to the south. In our view the significance of the church is enhanced by how it is experienced in this landscape, and in particularly the views of the tower from the north and then views of the church when moving south from Little Moor Farm to the village. It is its presence as a key marker, a historical landmark and as the dominant building in



that landscape. We therefore consider this non designated asset to be an important feature that contributes to the significance of the Grade II\* Church.

Recognising this landscape feature as a non designated heritage asset has highlighted links with the church, and how this landscape makes a positive contribution to the significance of the Church. In our view, the greater knowledge and understanding does increase the significance of the church. We would defer to the council in relation to the other asset, however we acknowledge the value of the links between the Farm and Church.

In terms of impact we have noted this elsewhere in previous letters, but the substation would be built across this boundary. It would sever it and remove an entire section. This would result in a direct physical impact upon the asset itself. We are conscious that the development would also erase the historical route between Little Moor Farm and Friston Moor and the village and would require a diversion of the right of way which has also survived along this boundary.

The scale and size of the development would deprive the church of its northern setting and would sever the relationship between the land to the north and the church. It would erode the rural context and remove any 'experience' of the church from the land to the north, and from this historic routeway and footpath. We have also set out this issue in previous advice.

We have reassessed this in light of the question set out above and concluded this development would result in a severe harm to the non designated asset and we remain of the view that it would result in very high degree of harm to the designated church. Our position remains unchanged, although we acknowledge that a greater understanding of the boundary does contribute more to our understanding and experience of the church and increases the contribution this land makes to the church's significance.

We continue to raise an in principle objection to the sub station element of the development. We remain of the view that heritage assets were not given due weight by the applicant in the site assessment process and therefore the contribution this land makes to the significance of the designated church was not fully considered.

## Conclusion

We continue to welcome the additional information and the focus on heritage assets, however as set out in our previous letter we wish to maintain our in principle objection to the substation and the National Grid infrastructure.



Historic England

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

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