



Historic England

EAST OF ENGLAND OFFICE

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

Our ref: PL00088303 & PL00541702

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13th January 2021

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

Historic England Deadline 4 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.

Confirmation of Historic England Comments at Deadline 4 13th Jan 2021

1) Proposed Changes to the Order Limits and Additional Land required (EA1N and EA2)

We can confirm we have no comment in relation to the revised order limits and additional land required, provided that should consent be granted they would be subject to the same archaeological conditions as set out in the draft DCO and detailed via the on and offshore WSI.

2) Revised DCO: (EA1N and EA2) Document Reference: 3.1 (Tracked) EA1N and EA2 and Schedule of Changes to the draft Development Consent Order

We can confirm we have considered the amendments in relation to the historic environment and have no comment in relation to the revisions to the DCO



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3) Revised SoCG

Following a meeting with the applicant in December further progress has been made on the SoCG, however a number of items are still under review and a further revision is expected by 3rd Feb 2021 (Deadline 5).

4) Revised On- and Off-shore Written Scheme of Investigation

Historic England have committed to returning comments on the changes that have been made to both the DRAFT WSI documents (On and Off-shore) to the applicant and ExA by 3rd Feb 2021 (Deadline 5).

5) Revisions to the DCO including updated photomontages and clarification notes

Following a discussion and meeting with the Applicant in December, Historic England have been made aware that the applicant has committed to changes to the overall design of both of the sub stations for EA1N and EA2, as well as modification to the landscape layout. These are changes that have been made to the draft DCO and are set out in various document including the Onshore Substations Update Clarification Note and in Deadline 3 Project Update Note (dated 15th December 2020).

Historic England understands the maximum height of buildings within the onshore substations would be reduced to 14m, external electrical equipment reduced to 14m, and lightning protection masts to 20m above the finished ground level. In addition the applicant has indicated there will be up to a 2.0 m reduction in the finished ground level.

We note there are corresponding changes to the OLMP and OLEMS documents (Revised chapter 8.7). These changes can be considered as a reduction of the onshore substation footprint to 190m x 170m which pushes the western boundary of the western substation some 40m to the east and will result in the retention of the existing 'covert' woodland, movement of NGET SuDS basin eastwards, additional planting to the north of the substations, particularly in the areas around the sealing end compounds, the addition of planting alongside field boundaries to the north of Friston, additional individual tree planting and updates to planting associated with the PRoW diversions.

In order to consider the changes the applicant has also provided a number of revised visualisations and these include Viewpoints 1 and 9, Cultural Heritage Viewpoints 3, 4, and 5, and a clarification note.



Historic England Advice

Historic England notes these changes and we are pleased that the applicant has set out to make amendments, has committed to these changes, and has provided the additional information.

We are very concerned that these changes have been presented very late in the day, with insufficient time for full consideration. The timetable allowed to consider these changes has been very short and given the new COVID restrictions and the Christmas leave period we have not been able to visit site to verify the findings. We cannot therefore be definitive in our advice. Likewise the new information, particularly the viewpoints, present only a snapshot of the likely effects. This perhaps would have been better presented as a discreet addendum to the ES.

That said, viewpoint 9 perhaps illustrates best that there will be some reduction in overall visibility of the scheme in longer range views particularly from the south of the village and that these changes would result in a lessening of the overall visual impact.

Views of the church from the north will still however be obliterated as illustrated (CHVP4), and in spite of the changes the loss of the footpath will continue to lead to a change to the relationship between the church and this land to the north. We not feel it is necessary to repeat the case we have presented with regards to the important contribution this area of land to the north of the church makes to the significance of the church, and how it is experienced in this landscape. Our position remains consistent with that presented in previous advice from 2018 onwards.

We likewise note the increased offer in relation to the OLMO and OLEMS, which includes retention of woodland and increased planting. All of which are welcomed. To some extent we are aware that the clarification with regards to the reduction in the footprint, the overall height and finished ground heights will increase the likely chance of success that the proposed mitigation would be effective in historic environment terms i.e. that the planting would be successful in providing mitigation against the harm caused by the development.

We also note the applicants approach to mitigation and screen planting has been further amended but—as voiced by the Council— we remain sceptical about the growth rates and consider the efficacy of the planting is optimistic. This has to remain a concern for Historic England. As we have said previously this is not an area of expertise for us and we are therefore reliant on the expertise that others have in this specialism and this geographic area. The issue



remains that should the application be granted then mitigation would need to be deliverable in order to be effective at reduced the clear and demonstrable harm to the historic environment.

We therefore consider the amended proposal would result in a minor improvement in the proposed landscape and screen planting, and as a result in the retention of existing woodland.

We would also continue to raise concerns about the location of the two western most sealing end compounds, which still appear to crash into the landscape rather than be placed with care, so as to avoid impacts upon historic field boundaries and features. This is something that is in the control of the applicants and could be addressed for the next deadline.

As set out previously and given we raised concerns about the scheme in 2018 (see Historic England Deadline 3 response) we have to ask why has it taken so long to see clarifications with regards to these effects. Can the applicant commit to further reductions before the next deadline and can the impact of the scheme be reduced further.

We note for example that there is no clarification with regards to the NGET substation and additional information is sought. This issue remains disappointing and an area of overall concern for us.

Historic England Position

We have previously concluded that the development of the sub-stations both individually and in conjunction with each other and with the NGET sub-station would result in harm to the historic environment. This is harm to the significance of a number of designated heritage assets from development within their setting, and through a major industrial and alien development within their immediate rural landscape context. Primarily though, our concerns are with the grade II* listed church of St Mary's, Friston, because of the important relationship of the development area to the church and the erosion of its rural setting. This would be a high degree of less than substantial harm.

Overall, we accept this new approach would result in some limited positive change to the scheme and these changes have the potential to result in a reduction in the overall level of harm. Particularly in the longer range views of the church and village from the south.

The scheme would, however, still result in the removal of the historic northern route way which appropriates and illustrates the role of this landscape in the appreciation of the more modest,



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humble and historic church. The changes would not reduce the overall impact in views from the north, which although potentially lessened would still result in views of the church being obliterated. In our view, although the changes are welcome, they would only result in a minor reduction in the level of harm to the historic environment.

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. The visual impact of the scheme is only one level of harm and these changes, although welcomed, do not in our view alter the impact of the overall development on the significance to the north of the Grade II* Church. Although we welcome the changes, Historic England do not consider this is sufficient to change our overall position and we maintain our in principle objection to the sub-station elements of both developments. This would be a high degree of less than substantial harm.

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

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