East Anglia ONE North & East Anglia TWO: Cultural Heritage Assessment

Addendum

prepared for Substation Action Save East Suffolk (SASES)

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1 Introduction

- 1.1 This addendum to the Cultural Heritage Assessment prepared by Richard Hoggett Heritage for SASES, dated October 2020 and submitted at Deadline 1, addresses the effects of several minor changes to the proposed design of the pair of substations, National Grid substation and associated infrastructure intended to be located at Friston.
- Details of these changes were set out in a Project Update Note (REP2-007), submitted by the applicant at Deadline 2, and the Onshore Substations Update Clarification Note (ExA.AS-11.D3.V1), submitted by the applicant at Deadline 3.
- 1.3 These documents set out three main changes to the proposals which have the potential to affect the conclusions of the submitted Cultural Heritage Assessment. Specifically, these changes are:
 - a reduction in the footprint of each of the onshore substations and their resulting relocation;
 - the lowering of the finished ground levels at the locations of the eastern onshore substations and National Grid substation:
 - a reduction in the maximum heights of the buildings and external equipment at both onshore substations.
- 1.4 These changes are reflected in a series of updated photomontages which were also submitted at Deadline 3.

2 Reduction In Footprint

- 2.1 As was set out in the Project Update Note (REP2-007), submitted by the applicant at Deadline 2, the design of the onshore substations has been refined so that the footprint of each station has been reduced from 190m x 190m (36,100 m2) to 190m x 170m (32,300m2).
- 2.2 This reduction has facilitated the micro-siting of the onshore substations to optimise their position relative to the surrounding landscape, specifically the siting of the substations slightly further to the west than originally intended. Further details are set out in the Onshore Substations Update Clarification Note, dated 15th December 2020 and submitted by the applicant at Deadline 3.
- 2.3 This reduction in footprint and associated relocation enables the retention of an established area of woodland situated to the west of the substation site, which would otherwise have been removed. The applicant states that the woodland will provide additional visual screening of the onshore substations and National Grid substation in views from the south and west.
- 2.4 An additional open space to the south of this woodland has been integrated into the Outline Landscape and Ecological Management Strategy and will see post-construction screening woodland planted in this area.
- 2.5 Although the submitted documents present a summary assessment of the impact of these changes on Landscape and Visual Amenity, Onshore Ecology, and Hydrology, Hydrogeology and Flood Risk, no mention is made of the proposals affecting the impact on Cultural Heritage.
- 2.6 Examination of the proposed reduced footprint of the two onshore substations presented in the Onshore Substations Update Clarification Note against the existing proposals indicates that all of the change is lateral and only represents a north-eastwards movement of the western onshore substation along the same access.

- 2.7 In terms of any changes to the heritage impacts identified as part of the original Cultural Heritage Assessment, these changes do nothing to affect the impact which the proposed development of the substations will have on the Grade II-listed Little Moor Farm (National Heritage List Entry No. 1215743) and High House Farm (National Heritage List Entry No. 1216049) to the north, indeed, the National Grid substation and associated infrastructure which lie closest to these buildings will be unchanged.
- 2.8 Similarly, although the revision will result in a slight relocation of the southwestern corner of the substation complex, it will not result in sufficient differences to alter the impact which the scheme will have upon the Grade II*-listed church of St Mary (National Heritage List Entry No. 1287864) and the Grade II-listed Friston War Memorial (National Heritage List Entry No. 1435814) to the south.
- 2.9 The retention of the mature woodland to the west of the western onshore substation will have an additional screening effect between the substation site and the Grade II-listed Friston House (National Heritage List Entry No. 1216066), but this is not considered to be sufficiently great as to reduce the heritage impact of the scheme upon Friston House from the level identified in the initial Cultural Heritage Assessment. Likewise, although the retained woodland will have a slight additional screening effect for the Grade II-listed Woodside Farm, this is again not sufficiently great as to reduce the identified level of heritage impact.

3 Finished Ground Levels

- 3.1 A second change set out in the submitted documents is the lowering of the finished ground levels at two of the three substation sites. These result in a potential reduction of 2m on the site of the eastern onshore substation, 0.7m at the National Grid substation and no change in the finished ground level of the western onshore substation. It should be emphasised that these figures are estimated.
- 3.2 It is argued that these reductions will result in a reduction in visibility and the resulting visual effects, and these changes are reflected in the updated photomontages submitted at Deadline 3.
- 3.3 Again, the potential for these changes to reduce the heritage impact of the proposed development schemes is extremely limited. There is no material reduction to the height of the western onshore substation, which lies closest to Friston House, Woodside Farm, the church of St Mary and the Friston War memorial. The western onshore substation is also clearly visible from Little Moor Farm and High House Farm to the north, and this will also remain unchanged.
- 3.4 The National Grid substation lies to the north of onshore substations, and consequently has the greatest impact upon High House Farm and Little Moor Farm, although it is also visible from Friston House and, potentially, Woodside Farm. It is considered that the 0.7m reduction in the ground level of the National Grid substation will have a negligible effect in reducing the heritage impact of the scheme. Indeed, it will have the effect of exposing more of the adjacent western onshore substation in views from the north.
- 3.5 The potential 2m reduction to the ground level of the eastern onshore substation will have a marginal effect upon the visibility of the structure in views southwards from Little Moor Farm, but these changes are not considered to be substantive enough to affect the assessment of heritage impact presented in the original Cultural Heritage Assessment.

4 Building and Equipment Parameters

- 4.1 A third change pertains to the reduction of the maximum building and external equipment parameters at the onshore substations, but not, it should be noted, at the National Grid substation.
- These changes include a 4m reduction in the height of the harmonic filters (to 14m), a 5m reduction in lightning protection masts (to 20m), a 3m reduction to the statcom building (to 12m) and a 1m reduction to the GIS building (to 14m).
- 4.3 These revised heights are also reflected in a series of updated photomontages submitted at Deadline 3.
- 4.4 Again, it is considered that none of these changes in height is sufficiently great as to be able to materially reduce the impact of the proposed schemes on the surrounding listed buildings enough to affect the assessment of heritage impact presented in the original Cultural Heritage Assessment.

5 Conclusion

- While the proposed changes to the development schemes are welcomed, ultimately it is concluded that the proposed reduction to the footprint of each of the onshore substations and their resulting relocation, the lowering of the finished ground levels at the locations of the eastern onshore substations and National Grid substation, and the reduction the maximum heights of the buildings and external equipment at both onshore substations will not be substantive enough to reduce the assessments of heritage impact presented in the original Cultural Heritage Assessment.
- 5.2 For reference, these impacts are summarised, together with those of the applicant, in the table below and full details of each assessment can be found in the Cultural Heritage Assessment undertaken by Richard Hoggett Heritage and submitted by SASES at Deadline 1 (PINS Refs: 20024106 & 20024110).1

Heritage Asset	Heritage Importance		Applicant's Assessment		-	My Assessment	
	importance		Magnitude of Impact	Significance of Effect			Significance of Effect
Church of St Mary	High (II*)		Low	Moderate		High	Major
Friston War Memorial	Medium (II)		Negligible	Minor		Medium	Moderate
Little Moor Farm	Medium (II)		Medium	Moderate		Medium	Moderate
High House Farm	Medium (II)		Low	Minor		Medium	Moderate
Friston House	Medium (II)		Negligible	Minor		Low	Minor
Woodside Farmhouse (EA1N)	Medium (II)		Medium	Moderate		Medium	Moderate
Woodside Farmhouse (EA2)	Medium (II)		Low	Minor		Medium	Moderate
Friston Post Mill	High (II*)		Negligible	Minor		Negligible	Minor

¹ https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010077/EN010077-002774-DL1%20-%20SASES%20-%20Written%20Representation%20Cultural%20Heritage.pdf