



EAST OF ENGLAND OFFICE

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

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15th April 2021

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

Historic England Deadline 9 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 9 - 15th April 2021

- 1) Historic England does not have any additional comments on updated draft DCO (dDCO) submitted at Deadline 8 (D8) nor the Statements of Common Ground (SoCG) submitted at Deadline 8 and have not noted any requests for further information from the ExAs for this deadline.
- 2) We have however noted that additional information that has been provided by the applicant, in particular the additional viewpoint photomontages that show the Potential National Grid east and west extension bays. Please find additional information below

Historic England Advice





We have reviewed this information and have focused on the new and updated cultural heritage viewpoints.

Overall Historic England appreciate the additional information. We consider it is right and appropriate for these extension bays to be considered as part of the examination and the absence of information has formed the basis of some earlier concerns.

Whilst we appreciate the additional material, we are of the view that this should not be viewed as a full assessment of cumulative impact. We have therefore considered the material as illustrative and informative.

In relation to the onshore historic environment our principal concern, as within our remit, is the potential impact of the proposed development of the substations for EA1N and EA2 on the significance of the grade II* listed Church of St. Mary at Friston. This is individually and the cumulatively when combined with each other, with the additional National Grid infrastructure, and now the extension bays.

We have now considered the impact of these additional National Grid extensions (east and west) in our assessment. Given the time available we have not however undertaken a full review of the evidence or a further site visit.

Impact

Having considered the new information Historic England is of the view that should additional extensions be added to the substation development, then it is likely that they would increase the impact the development would have on the significance of the grade II* church of St Marys at Friston, and to some extent increase the level of harm to the historic environment.

The substations development, individually and particularly cumulatively with the eastern and western additions would occupy a very large footprint and the overall amount or quantum of development would be considerable. Cumulatively they would therefore have an increased detrimental impact on the character of the land in the area to the north of the village of Friston.

This is demonstrated in part by the Cultural Heritage Viewpoints (e.g. CHVP3 -Appendix 24.7, Figure 8 - Update) which indicates that the extensions to the substation when combined with all the proposed development are likely to further decrease the visibility of the church in the



landscape and increase the amount of development in some views, particularly from the north towards Friston and from the north west around Friston Moor.

The impact upon the historic environment would be potentially more marked from the western extension, which extends in wider arc across open countryside. With the effects of the eastern extension being partially masked by existing landforms of Laurel Covert and from being behind SPRs eastern sub-station.

The restrictions on views to the church from the north and the total loss of key views from the immediate setting of the church would however remain as would the loss of the connecting footpath between places like Friston Moor and Little Moor Farm and the church. We do not feel we need to set out our position again with regards to this matter, as it is already set out in our earlier letters.

We do however feel it is also worth stating that we maintain a concern as to whether the planting as proposed in the OLEMS would be effective in its job of mitigating the impact of the development on the significance of the designated heritage assets. We note the council have agreed a position with the applicant in relation to growth rates and defer to their expertise in these matters. We continue to note however that if the OLEMS proposal is not effective, then the overall harm from the development would be exacerbated and the scheme potentially more harmful in historic environment terms.

Policy

Following the policy set out in the EN-1 Overarching NPS for Energy we feel it is worth reiterating some of the policy considerations

In this regard we are concerned about the need to address the particular nature of the significance of the heritage assets (see Section 5.8.12) and to take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment (5.8.13). Furthermore, loss affecting any designated heritage asset should require clear and convincing justification (5.8.14) and therefore any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit (5.8.15).

In relation to development affecting the setting of a designated heritage asset, the policy also states that applications should be treated favourably that preserve those elements of the



setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, any negative effects should be weighed against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval (5.8.18).

Conclusion

We remain of the view that the development of the sub-stations both individually and in conjunction with each other, with the NGET sub-station scheme and then with additional east and west extensions would result in a high degree of harm to the significance of the designated asset. Should the additional extensions be developed in this location then we consider this would potentially lead to a further decrease in the legibility of the church in the landscape and further erode the connection between Friston Moor and Friston, which would in turn lead to an increase in the overall level of harm. This would remain a significant effect, but we consider it would still be less than substantial harm, albeit it at the upper/high end of that spectrum.

As set out in our previous letter although we continue to welcome the additional information, however we wish to maintain our in-principle objection to the sub-station and the National Grid 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

[Redacted signature]

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Inspector of Ancient Monuments

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