

**SCOTTISHPOWER
RENEWABLES**

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments Historic England's Deadline 9 Submission

Applicant: East Anglia TWO and East Anglia ONE North Limited
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Applicable to East Anglia ONE North and East Anglia TWO



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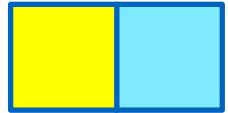
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Glossary of Acronyms

CIA	Cumulative Impact Assessment
DCO	Development Consent Order
HE	Historic England
PD	Procedural Decision



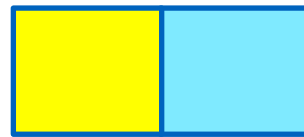
Glossary of Terminology

Applicant	East Anglia TWO Limited / East Anglia ONE North Limited
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.



1 Introduction

1. This document presents the Applicants' comments on Historic England's (HE) Deadline 9 submission (REP9-058).
2. This document is applicable to both the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23rd December 2019 (PD-004). Whilst this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it for the other project submission.



2 Comments on Historic England's Deadline 9 Submission

2.1 Deadline 9 submission (REP9-058)

ID	HE's Comment	Applicants' Comments
Confirmation of Historic England Comments at Deadline 9		
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.	Noted.
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.	Noted.
Historic England Advice		
3	<p>We have reviewed this information and have focused on the new and updated cultural heritage viewpoints.</p> <p>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.</p> <p>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.</p>	Noted. The Applicants agree that the information within REP8-074 does not comprise a cumulative impact assessment (CIA). This is for the reasons stated in section 1.1 , namely that there is insufficient information on Nautilus and Eurolink to undertake a CIA.



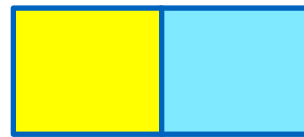
ID	HE's Comment	Applicants' Comments
4	In relation to the onshore historic environment our principal concern, as within our remit, is the potential impact of the proposed development of the substations for EA1N and EA2 on the significance of the grade II* listed Church of St Mary at Friston. This is individually and the cumulative when combined with each other, with the additional National Grid infrastructure, and now the extension bays.	Noted.
5	We have not 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.	Noted. It is assumed by the Applicants that HE's comment was meant to read " <i>We have considered...</i> " as this would be consistent with the comments that follow in its response.
Impact		
6	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.	Noted.
7	The substations development, individually and particularly cumulatively with the eastern and western additions would occupy a very large footprint and the overall amount of 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.	The Applicant's agree that the extensions to the National Grid substation would enlarge the footprint of the development, but do not agree that this would lead to an increase in the adverse impact on the church. The location of the extensions to the north of the onshore substations would not further affect experience of the church in its landscape setting or the important views to or from the church in any substantive manner. As a result, the Applicants do not consider that there would be cumulative impact on the church.



ID	HE's Comment	Applicants' Comments
8	<p>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.</p>	<p>The Applicants consider that the point being made by HE is not supported by the photomontages that have been provided. Instead the photomontages illustrate how the National Grid substation extensions would be experienced within the visible extent of the existing proposals.</p>
9	<p>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.</p>	<p>Agreed.</p>
10	<p>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.</p>	<p>This analysis from HE does not find evidence for cumulative impacts resulting from the National Grid extensions. Instead it simply confirms that the impact of the onshore substations would remain as previously assessed by HE.</p>
11	<p>We do feel however 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 designates 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 overall harm from the development would be</p>	<p>Noted. The Applicants believe that they have not overstated the beneficial effect of the Outline Landscape and Ecological Management Strategy (document reference 8.7) in terms of mitigating adverse impacts on the significance of heritage assets. It is considered that significant mitigation would only be achieved for Little Moor Farm and Woodside Farmhouse and, specifically, not for Friston Church (the asset that is the subject of HE's comments).</p>



ID	HE's Comment	Applicants' Comments
	exacerbated and the scheme potentially more harmful in historic environment terms.	
Policy		
12	<p>Following the policy set out in the EN-1 Overarching NPS for Energy we feel it is worth reiterating some of the policy considerations.</p> <p>In this regard we are concerned about the need to address the particular 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).</p>	<p>The Applicants note the policy position in EN-1 and agree that the negative impacts on heritage assets fall to be considered in the balance. The setting of the Church to the north has already been altered by the introduction of the 400 kV overhead line and agricultural changes that have occurred since the 1950's.</p>
13	<p>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 wide 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).</p>	<p>Noted and agreed.</p>
Conclusion		



ID	HE's Comment	Applicants' Comments
14	<p>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, albeit it at the upper/high end of that spectrum.</p>	Noted.
12	<p>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.</p>	Noted.
13	<p>If there are any further material changes to the proposals, or you would like further clarification in relation to our advice, please contact us.</p>	Noted.