

**SCOTTISHPOWER
RENEWABLES**

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on Historic England's Deadline 11 Submissions

Applicant: East Anglia TWO and East Anglia ONE North Limited

Document Reference: ExA.AS-15.D12.V1

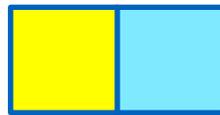
SPR Reference: EA1N_EA2-DWF-ENV-REP-IBR-001115

Date: 28th June 2021

Revision: Version 1

Author: Royal HaskoningDHV

Applicable to East Anglia ONE North and East Anglia TWO



Revision Summary				
Rev	Date	Prepared by	Checked by	Approved by
01	28/06/2021	Paolo Pizzolla	Lesley Jamieson / Ian Mackay	Rich Morris

Description of Revisions			
Rev	Page	Section	Description
01	n/a	n/a	Final for Submission

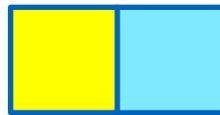
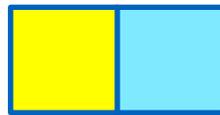


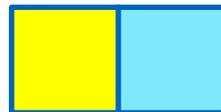
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Glossary of Acronyms

DCMS	Department for Digital, Culture, Media and Sport
DCO	Development Consent Order
ES	Environmental Statement
ExA	Examination Authority
ExQs	Examination Authority's Written Questions
NPS	National Policy Statement
PD	Procedural Decision
PRoW	Public Rights of Way



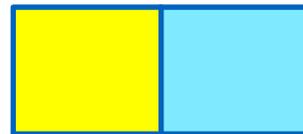
Glossary of Terminology

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 ONE North windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
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.
East Anglia TWO windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order but will be National Grid owned assets.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
Onshore substation	The East Anglia TWO / East Anglia ONE North substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.



1 Introduction

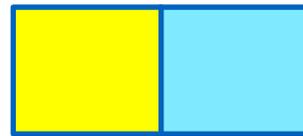
1. This document presents the Applicants' comments on Historic England's Deadline 11 submissions as follows.
 - Applicants' Comments on Historic England's Deadline 11 Submission – Response to question ExQ3.8.4 in the Examining Authorities' written questions (ExQs3) (REP11-113).
2. This document is applicable to both the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications (the Applications), and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's (ExA'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.



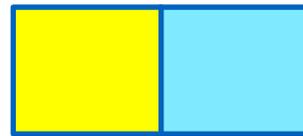
2 Comments on Historic England's Deadline 11 Submissions

2.1 Applicants' Comments on Historic England's Deadline 11 Submission – Response to question ExQ3.8.4 in the Examining Authorities' written questions (ExQs3) [REP11-113]

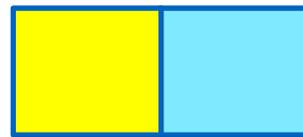
ID	ExA's Question	HE's Comment	Applicants' Comments
3.8 Historic Environment			
1	<p>3.8.4 Cumulative Impacts</p> <p>The ExAs note in the Clarification Note – Archaeology and Cultural Heritage [REP1-021] that the Applicants acknowledge that the public right of way trackway to the north of the Church 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.</p> <p>a) 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)?</p> <p>b) If yes, how would this significance be affected by the proposed projects?</p>	<p>Relevant Policies</p> <p>National Policy Statement for Renewable Energy Infrastructure (EN-3)</p> <p>There are heritage assets with archaeological interest that are not currently designated as scheduled monuments, but which are demonstrably of equivalent significance. These include:</p> <ul style="list-style-type: none"> • Those that have yet to be formally assessed for designated; • 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. <p>The absence of designation for such heritage assets does not indicate lower significance. If</p>	<p>The Applicants note Historic England's comments on the schedulable qualities of the trackway, but that it is subsequently acknowledged '<i>that it is unlikely an asset like this would meet the criteria for designation under the terms of DCMS guidelines (DCMS, 2013)</i>'. The Applicants agree that the trackway is unlikely to meet the criteria for a designated heritage asset (in this case those criteria for scheduling set out in the guidance of Annex 1 of DCMS Scheduled Monuments, October 2013).</p> <p>The Applicants note that Historic England nevertheless comments that the trackway '<i>clearly demonstrates high values and therefore has a high overall significance</i>'. However, this case is not supported by the available evidence and the Applicants do not agree that the trackway is demonstrably of equivalent significance of a scheduled monument (a conclusion that would suggest the trackway is of comparable importance to the Church of St Mary the Virgin, Friston). The Applicants do not consider the trackway is of comparable importance to the Church, but note it has been treated as a heritage asset within the setting</p>



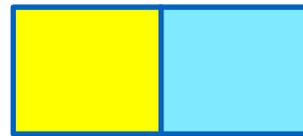
ID	ExA's Question	HE's Comment	Applicants' Comments
		<p>the evidence before the IPC indicates to it that a non designated heritage asset of the type described in 5.8.4 may be affected by the proposed development, then the heritage asset should be considered subject to the same policy considerations as those that apply to all designated heritage assets.</p> <p>Historic England Advice</p> <p>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 and 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.</p> <p>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</p>	<p>of the Church that contributes to the significance of Church.</p> <p>The Applicants' understanding is that Historic England's view is that the significance of the trackway is inherently linked with the contribution that it makes to the setting, and ability to appreciate the heritage significance, of designated heritage assets in the vicinity (namely the Church of St Mary, a Grade II* listed building and to a lesser extent to Little Moor Farm, a Grade II listed building).</p> <p>Detailed multifaceted consideration of the trackway referenced within Historic England's submission was submitted at Deadline 1 within the Applicants Archaeology and Cultural Heritage Clarification Note (REP1-021).</p> <p>This note is still considered most relevant as the Applicants position on the significance of the trackway. The note covers the trackway from a heritage setting, archaeological, landscape and amenity perspective. Paragraph 106 makes brief reference to scheduling.</p> <p>In summary, the Applicants consider that the trackway should be considered under paragraph 5.8.6 of the National Policy Statement (NPS) for Energy (EN-1), and not paragraph 5.8.5.</p>



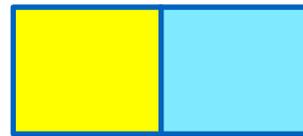
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		<p>trackway and boundary could therefore have existed in this landscape for centuries and have survived against landscape reorganisation and agricultural change.</p> <p>The trackway and boundary can demonstrate a number of heritage values - it is 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.</p> <p>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 tangible heritage and social values, and we would agree that this should be considered as a non designated heritage asset. It clearly demonstrtrates high values and therefore has a high overall significance.</p> <p>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</p>	



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		<p>not currently designated as scheduled monuments, but which are demonstrably of equivalent significance', in particular bullet point 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.</p> <p>Impact</p> <p>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.</p> <p>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</p>	



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		<p>the church when moving south from Little Moor Farm to the village. It is its presence as a key marker, a historical landscape 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.</p> <p>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 to the links between the farm and Church.</p> <p>In terms of impact we have noticed 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 required a diversion of the right way which has also survived along this boundary.</p>	



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		<p>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.</p> <p>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 a very high degree of harm to the designated church. Our position remains unchanged, although we acknowledge that a great 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</p> <p>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.</p>	



ID	ExA's Question	HE's Comment	Applicants' Comments
		<p>Conclusion</p> <p>We continue to welcome the additional information and the focus on heritage assets, however as set in our previous letter we wish to maintain our in principle objection to the substation and the National Grid Infrastructure.</p>	