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Bramford to Twinstead Reinforcement

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Assessment

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1. Introduction

1.1 Overview

- 1.1.1 National Grid Electricity Transmission plc (here on referred to as National Grid) is making an application for development consent to reinforce the transmission network between Bramford Substation in Suffolk, and Twinstead Tee in Essex. The Bramford to Twinstead Reinforcement ('the project') would be achieved by the construction and operation of a new electricity transmission line over a distance of approximately 29km (18 miles). This would comprise of overhead lines, underground cables and a grid supply point (GSP) substation. It also includes the removal of 25km of the existing 132kV distribution network and 2km of existing 400kV overhead line.
- 1.1.2 It is assumed that this reinforcement would operate at a voltage of least 400kV in a similar way to the majority of the rest of the transmission network. For the purposes of this report, the new overhead line is referenced as 'proposed 400kV overhead line' to differentiate it from the existing 400kV overhead line and the UK Power Networks owned 132kV overhead line.
- 1.1.3 Hintlesham Hall (National Heritage List for England [NHLE] UID 1036917) is a Grade I listed country house dating originally to the late 16th century and sitting within an area of parkland associated with the original estate. Some of the other buildings associated with the hall are also listed, including the Grade II listed lodge (NHLE UID 1351645) and the Grade II* listed service ranges (NHLE UID 1036918), which are hereafter described as the Hall's 'ancillary buildings'.
- 1.1.4 This report has been produced following discussions held with English Heritage prior to the project pause in 2013. English Heritage became known as Historic England in 2015 and is hereafter referred to Historic England for the remainder of this report. The report also considers the feedback received from Historic England and Suffolk County Council since the project recommenced in 2020, through formal consultation responses and heritage thematic meetings.
- 1.1.5 Consultation undertaken in 2012 established that Historic England regard the Hall and its ancillary buildings together as an '*exceptional group of listed buildings*' warranting '*specific consideration in terms of [the project]*'. The Hall and ancillary buildings merit special consideration in terms of their setting, as they stand on the edge of Hintlesham village in a prominent position in the landscape on raised ground which overlooks farmland to the west. Despite the original historic parkland around the listed buildings having been reduced in size and with the existing 400kV overhead line to their north, the immediate gardens and wider landscape setting show how a country estate functioned and the relationship to the house of the gardens and landscape contributes to its aesthetic values. In combination, the various elements including the Hall, ancillary buildings, gardens and wider rural setting represent constitute the core of an historic country estate.
- 1.1.6 The project includes a section of proposed 400kV overhead line, which would be located parallel to the existing 400kV overhead line within 500m of the Hall. Further assessment has been undertaken to assess the extent of potential changes to the Hall's setting and how they might affect the asset's significance given that Hintlesham Hall is of Grade I listed status and that the ancillary buildings are Grade II* and due to their proximity to the proposed 400kV overhead line.

- 1.1.7 This report focuses on the proposed 400kV overhead line to the north of Hintlesham Hall, as it is the only element of the project that has the potential to negatively affect the Hall's setting. The proposed removal of a section of the 132kV overhead line approximately 1km to the south-east of the Hall is excluded from the assessment presented in this report, as it is likely to have a beneficial effect on the Hall's historic setting through removal of modern overhead infrastructure from the wider rural environment.
- 1.1.8 Construction effects, whilst potentially negative to the setting of built heritage in terms of visual intrusion, noise and dust, are temporary in nature, and as such effects have been excluded from the assessment presented within this report. Construction effects on Hintlesham Hall and the effects of the project on other listed buildings can be found in ES Appendix 8.2: Historic Environment Impact Assessment (**application document 6.3.8.2**).

1.2 Planning Policy Context

- 1.2.1 The project meets the threshold as a Nationally Significant Infrastructure Project (NSIP), as defined under Part 3 of the Planning Act 2008, hence National Grid requires a development consent order for the proposals. The two relevant National Policy Statements (NPS) for the project are the Overarching NPS for Energy (EN-1) (Department of Energy and Climate Change (DECC), 2011a) and the NPS for Electricity Networks Infrastructure (EN-5) (DECC, 2011b). EN-1 and EN-5, taken together, provide the primary basis for decisions taken by the Secretary of State on applications it receives for electricity networks infrastructure, and in turn the project. Further details are provided in Chapter 6 of the Planning Statement (**application document 7.1**).
- 1.2.2 Paragraphs 5.8.14 and 5.8.15 of NPS EN-1 relate to 'harm' and 'substantial harm' of designated heritage assets.
- 1.2.3 Paragraph 5.8.14 states that:
'There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Once lost heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a Grade II listed building park or garden should be exceptional. Substantial harm to or loss of designated assets of the highest significance, including ... Grade I and II listed buildings;... should be wholly exceptional'.*
- 1.2.4 Paragraph 5.8.15 states that:
'Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss. Where the application will lead to substantial harm to or total loss of significance of a designated heritage asset the IPC should refuse consent unless it can be demonstrated that the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm'.
- 1.2.5 The National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government (MHCLG), 2021) also sets out the criteria relating to the consideration of potential impacts on designated heritage assets. Paragraph 200 states:

‘Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably...grade I and II* listed buildings...should be wholly exceptional’.*

1.2.6 Paragraph 201 of NPPF states that *‘Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss...’*

1.2.7 Paragraph 202 of the NPPF further states that *‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.’*

1.2.8 This report seeks to determine whether the project would result in substantial harm or not to Hintlesham Hall and its ancillary buildings, as per EN-1 and NPPF policy.

1.3 Definitions Used Within This Report

Setting

1.3.1 Setting is described by the NPPF (MHCLG, 2021) glossary as *‘The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral’.*

1.3.2 NPS EN-1 does not make any reference to setting, although the consultation draft of EN-1 (Department for Business, Energy and Industrial Strategy (BEIS), 2021a) includes a footnote to paragraph 5.9.3 which states *‘The setting of a heritage asset is the surroundings in which it is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, and may affect the ability to appreciate that significance or may be neutral’.*

1.3.3 Good Practice Advice in Planning 3 The Setting of Heritage Assets (Historic England, 2015) hereafter referenced as GPA3, states that:

‘Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.

The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are

in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.'

- 1.3.4 In terms of setting being a contributor to significance, the NPPF glossary describes significance in relation to heritage policy as *'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting'*.
- 1.3.5 In this report, setting is comprised of both the visual and historic setting of the Hall. The former includes views to and from the Hall within its immediate environs. The existing key views from the Hall include the views south-west from the Hall and north-east to it down the formerly tree-lined avenue, now mostly gone but visible on Ordnance Survey maps prior to the mid-20th century (National Library of Scotland). The historic sightline is represented by the partially surviving cleared avenue within Hintlesham Woods.
- 1.3.6 The setting also comprises the surviving parts of the formal parkland that came into existence when the house was built, and its former historic extents which have been lost to reversion to agriculture. The parkland still includes contemporary historic features such as ponds and different parts of the parkland contribute to the asset's value to different extents, depending on their degree of survival from their original form.

Substantial Harm

- 1.3.7 There is no definition of the term 'substantial harm' in EN-1 or in the NPPF (MCHLG, 2021). GPA3 (Historic England, 2015) states in paragraph 27 that *'Substantial harm is a high test which may not arise in many cases'*.
- 1.3.8 For this report, 'substantial harm' is taken to arise from effects to designated assets equivalent to the total loss of an asset or a degree of loss resulting in the loss of understanding of the asset. The latter might arise when an asset's setting would experience changes which would remove or affect key characteristics. This could for example arise from effects relating to severance or extensive visual intrusion.
- 1.3.9 The 'substantial harm' terminology is considered to be equivalent in both the NPS EN-1 and NPPF. The NPS definition of 'harm' is considered to be equivalent to the NPPF 'less than substantial harm'.
- 1.3.1 With respect to the NPPF, the 2013 case of Bedford Borough Council v Secretary of State for Communities and Local Government, Nuon UK Ltd [2013] EWHC 2847 (Admin) (paras 24-25), the High Court held that in order for harm to designated assets to be considered substantial, *'the impact on significance was required to be serious such that very much, if not all, of the significance was drained away... One was looking for impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced.'*
- 1.3.2 The National Planning Practice Guidance (NPPG) (MCHLG, 2019) was subsequently updated to provide additional clarity on assessing substantial harm. The NPPG states in paragraph 18a-018 that *'Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the NPPF. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the*

degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.'

- 1.3.3 The UK Holocaust memorial at Victoria Tower Gardens in Westminster (case reference APP/XF990/V/19/3240661) was granted planning permission on appeal on 29 July 2021. In considering how substantial harm should be measured, the Inspector stated that:

'The applicant relies on the definition of substantial harm (and the calibration of lesser harms that flow from it) set out in the Bedford case, broadly defined as a high test. Westminster City Council on the other hand prefer to rely on the example of substantial harm set out in paragraph 018 of the PPG, a definition, as I understand it from their oral evidence, which sets the test at a lesser height...

...My interpretation of this point, also bearing in mind paragraph 018 of the PPG has been formulated in light of the Bedford judgement, is that there is in fact little to call between both interpretations. Bedford turns on the requirement for the harm to be assessed as 'serious' (with significance needing to be very much, if not all, 'drained away') in order that it be deemed substantial. Alternatively, paragraph 018 indicates that an important consideration would be whether the adverse impact 'seriously' affects a key element of special interest. In both interpretations, it is the serious degree of harm to the asset significance which is the key test. Moreover, in accordance with the logic of the Bedford argument, 018 explicitly acknowledges that substantial harm is a 'high test'.

- 1.3.4 The planning permission for the UK Holocaust Memorial was subsequently quashed by the High Court (London Historic Parks And Gardens Trust v Minister of State for Housing & Anor [2022] EWHC 829 (Admin) (08 April 2022)). However, although the statutory challenge was ultimately successful on other grounds, the grounds alleging that the Inspector had applied the wrong legal test to the issue of whether there would be substantial harm to the heritage assets failed. Paragraphs 52 and 53 of the judgement stated support for the Bedford Borough Council judgement, stating:

'52. It is plain that Jay J saw the Inspector's approach as essentially the same as the approach that he (Jay J) endorsed in [25] as a correct basis for addressing the question, i.e. a decision maker would properly both interpret and apply the concept of substantial harm in the NPPF, if s/he assessed whether the impact of the proposed development was sufficiently serious in its effect that the significance of the designated heritage asset, including the ability to appreciate that asset in its setting, was (if not vitiated altogether) at least very much reduced. Jay J considered the reference to significance being "very much ...drained away" as no more than an alternative, metaphorical means of expressing the concept of substantial harm. In considering that "substantial" and 'serious' may be regarded as interchangeable adjectives in this context" [26], his judgment is consistent with the advice in the Planning Policy Guidance that, when considering whether or not any harm is "substantial", an important consideration would be whether the adverse impact seriously affects a key element of special architectural or historic interest

53. Accordingly, read as a whole and in context, Jay J's judgment does not import a test of 'draining away' to the test of substantial harm. He was not seeking to impose a gloss on the term. The judgment in Bedford accords with the approach stated by the Senior President of Tribunals at [74] in Bramshill. It is clear from cases like Tesco v Dundee [2012] UKSC 13; R(Samuel Smith) v North Yorkshire County Council [2020] UKSC 3; Bramshill and others, that a word like 'substantial' in the NPPF means what it says and any attempt to impose a gloss on the meaning of the term has no justification in the

context of the NPPF. The policy framework and guidance provide a steer that relevant factors include the degree of impact, the significance of the heritage asset under scrutiny and its setting. It is not appropriate to treat comments made by a Judge assessing the reasoning of an individual decision maker, when applying the test of 'substantial harm' to the circumstances before him/her, as creating a gloss or additional meaning to the test.'

1.3.5 The above therefore provides a view as to the level at which harm might become substantial.

1.4 Structure of This Report

1.4.1 This report is structured as follows:

- Chapter 2 provides a summary of the baseline environment including a description of the listing;
- Chapter 3 sets out the methodology used for the assessment;
- Chapter 4 describes the environmental impact assessment undertaken to define whether the project would have significant effects on the setting of the hall; and
- Chapter 5 presents the conclusions, which draw together the assessment and conclude whether the project is anticipated to result in harm or substantial harm to Hintlesham Hall and its ancillary buildings.

2. Baseline Environment

2.1 Description and Historical Background

- 2.1.1 Hintlesham Hall is a Grade I listed country house (now hotel and spa) dating originally to the late 16th century. The listed building description notes that the building has a core dated to c.1576. The Suffolk Historic Environment Record (HER) reports that Hintlesham Hall was erected in 1588 by John Timperley. The house was altered in the 1680s by Henry Timperley and remodelled circa 1725-40 by Richard Powys. The Grade II listed lodge dates from this period, as do parts of the Grade II* listed service ranges (NHLE UID 1036918). The Grade II listed gate piers, gates and railings date from the late 18th Century. The Hall and its ancillary buildings are shown on Figure 8.6: Hintlesham Hall Assessment (**application document 6.4**).
- 2.1.2 The HER also records, associated with the Hall, the park, fishponds leading to a hydraulic ram, 'The Basin' (possibly an ornamental fishpond), and an 'icehouse' marked on the first edition Ordnance Survey map of 1883 close to 'The Basin'. The HER notes that the Hall and park are shown on Hodskinson's map of Suffolk, 1783. The HER also notes that a map of 1595 appears to show an open-ended rectangular moat, named 'Hintlesham Halle' at the same location, suggesting a medieval precursor to the later 16th century hall.
- 2.1.3 The Hintlesham parish Tithe Map dated 1837 shows the extent of the park around the Hall, as does the Ordnance Survey mapping of 1883 – 1905 (National Library of Scotland, 2023). The parkland included an area of walled garden 100m to the north of the Hall's ancillary building. The historic walled garden within the estate has been partly hard surfaced and turned into a car park, and a service building has been erected to the north of the walled garden next to a yard containing building materials.
- 2.1.4 The historic maps show parkland defined to the north by a strip of woodland, to the east and west by hedgerows and trees and to the south by the Ipswich Road. In addition, a tree-lined avenue starts at the front of the Hall (the Hall is orientated facing south-west), crossing the park, the Ipswich Road and continuing across fields in a south-west direction, before a break of one field and then a cleared drive extends the line through Hintlesham Little Wood and Hintlesham Great Wood. Hintlesham Park is shown on the Ordnance Survey maps throughout the 20th century, and still appears on the modern OS mapping, with the exception of the tree-lined/ tree-cleared vista which is significantly degraded by the 1930s and disappears completely by the 1950s.
- 2.1.5 The degradation of parts of the original park have chiefly occurred since the mid-20th century. This demonstrated that nearly all the major changes have occurred since 1972 and comprised the felling and removal of almost all the parkland trees to the west and north-west of the Hall, and the creation of large arable fields on what was once grass. To the east and north-east of the Hall, a golf course has been laid out, causing changes to the historic tree cover. Turning in more detail to the changes immediately around the Hall itself, one of the major alterations since 1972 has been the erection of a club house for the golf course to the east of the walled garden.
- 2.1.6 Components of the park still surviving include the perimeter planting to the south, east and north, and Church Walk connecting to the Church of St Nicholas. Parts of the central core and its planting can still be identified, together with the Hall, the walled garden and coach house.

- 2.1.7 The Hall was used as a Red Cross Hospital during World War II but stood empty for a time between the late 1960s and early 1970s. It was during this time that, according to a local history of the Hall, some of the park was sold for farmland. The Hall was restored during the 1970s and became a hotel in the 1980s.
- 2.1.8 The Hall was listed on 22 February 1955 with the ancillary buildings. The installation of the existing 400kV overhead line took place in the 1960s, after the listing. The date of the reversion of part of Hintlesham Park to arable agriculture cannot be dated exactly but is roughly contemporary with the listing.

2.2 Significance and Designation

- 2.2.1 The primary interest and reason for designation of Hintlesham Hall is the architectural and historical value of the Hall and other buildings associated with the Hall, which form a group. These are located on Figure 8.6: Hintlesham Hall Assessment (**application document 6.4**). The list description does not include a reason for the designation, but internal details are assumed to be among the reasons for the building's high Grade of listing. The first floor drawing room (known as the Carolean Room) is cited in the list description as an example of the internal and external architectural detail.
- 2.2.2 The park is not mentioned in the list description and is not included in the Register of Historic Parks and Gardens of special historic interest in England. It is recorded by the Suffolk HER (HER number HNS0007) as a non-designated heritage asset, with a defined extent, based on the historic extent of the park. Digital data provided by Suffolk County Council provides the extent of 'Greens' within the County, and this also includes Hintlesham Park as shown on Figure 8.6: Hintlesham Hall Assessment (**application document 6.4**). Hintlesham Park is part of the setting of Hintlesham Hall and ancillary buildings.

2.3 Contribution of Setting to Significance

- 2.3.1 The setting of Hintlesham Hall and associated listed buildings is defined by the historic extent of the park, with views to the south-west (to which the front of the Hall is orientated) that formerly included the avenue and drive through Hintlesham Woods. The park is (and has been throughout historic map sequencing) defined to the north, east and south by woodland that limits the visual relationship between the Hall and the surrounding countryside in these directions. Views out of the park are possible, but other than the avenue and drive to the south-west, deliberate vistas and sightlines are not evident (i.e. there is no other surviving structural planting outside Hintlesham Park that may have formed a deliberate sightline from within the park).
- 2.3.2 Hintlesham Hall is visible from a short section of the Ipswich Road (A1071), immediately to the south-west of the Hall (approximately where the road would have been crossed by the former avenue referred to above). Other than this, views of and including the Hall are very limited from both within and outside of its setting. This is largely a result of the woodland belts that form the boundary to the extent of Hintlesham Park.
- 2.3.3 There are parts of Hintlesham Park that survive well: the core buildings of the Hall, service ranges, stables, coach house and brewhouse; the lodge; the main drive; and a small area of intact parkland to the east of the main drive. Conversely, the areas now in use as a golf course and arable fields are poorly preserved in that they no longer retain their parkland character.

- 2.3.4 The significance of the Hall rests primarily in its architectural and historical value. The surrounding park adds to this significance, presenting a group of assets that collectively illustrates a country house and estate of post medieval date, and provides evidence for post medieval social, economic, architectural and domestic trends and activities.
- 2.3.5 Those parts of the setting that survive relatively intact make the greatest positive contribution to the significance of the Hall in terms of the ability to appreciate the Hall within a designed setting. This includes the area to the north of the main drive, and the area immediately surrounding the listed buildings.
- 2.3.6 The areas that have lost their parkland character do not make as great a contribution, but do not go as far as making a negative contribution to the significance of the Hall. The survival of the outer boundaries of the parkland marks its extent so that whilst visually the area now converted to arable use does not make a positive visual contribution, it does add to the narrative of the Hall and ability to understand its designed setting. The area affected by the project makes a positive contribution to the significance of the Hall, but the contribution is minor, particularly when this area is compared to better preserved parts of the parkland.
- 2.3.7 The area to the east of the main drive is the least altered part of the setting of Hintlesham Hall. The park is entered from the lodge and the parkland character (illustrated by the retention of managed grassland, trees and tree-lined drive and church-walk) is clearly visible creating a character and context to the Hall.
- 2.3.8 An important view of Hintlesham Hall is revealed from the main drive, which turns right at this point. The view is similar to the one from the Ipswich Road.
- 2.3.9 The area to the north and west of the Hall in contrast are the most altered part of the setting of Hintlesham Hall. These areas have been converted to arable land and retain very little parkland character which limits the contribution made by this part of the park to the appreciation and understanding of Hintlesham Hall. This area also includes the existing 400kV overhead line.

2.4 Development Since 2013

- 2.4.1 Hintlesham Golf Club has built an extension to their clubhouse as a venue for functions. Planning permission was granted by Babergh District Council in 2011 (planning application reference B/11/00184). This is for the '*erection of single-storey dining room extension and infilling of existing courtyard area to form function/meeting room*'. The extension on the north-east corner of the clubhouse is small in scale, being approximately 10m x 15m in plan.
- 2.4.2 A planning application was submitted by Hintlesham Golf Club in July 2013 for a building to the north of the clubhouse in the arable field through which the existing 400kV overhead line passes (planning application reference B/13/00861) for the '*erection of building for five bay driving range*'. Planning permission was granted in October 2013 but the building has not been built to date.
- 2.4.3 A hybrid application for five cottages to the north of the clubhouse (nearer the existing 400kV overhead line) was refused by Babergh District Council (planning application reference DC/21/04360) in March 2022.

3. Methodology

3.1 Data Sources

3.1.1 Baseline data for the assessment presented in this report has been obtained from the following sources:

- Suffolk Historic Environment Record (acquired in August 2022);
- The National Heritage List and National Monuments Record (Historic England, 2021);
- Historic mapping including Ordnance Survey and Tithe Mapping (Genealogist, 2023; and National Library of Scotland, 2022); and
- Site visit in June 2022.

3.2 Methodology

3.2.1 The criteria for assessing sensitivity, magnitude and significance are described in ES Appendix 8.2: Historic Environment Impact Assessment (**application document 6.3.8.2**). The conclusions then draw on the discussion presented in the impact assessment and uses professional judgement to determine the case for harm on the Hall.

3.2.2 In terms of the Environmental Impact Assessment (EIA) methodology in the context of 'harm and substantial harm' (refer to Section 1.2 of this report regarding NPS EN-1 requirements), ES Chapter 8: Historic Environment (**application document 6.2.8**) considers moderate and major adverse effects (significant effects) to constitute substantial harm, and minor adverse effects (not significant) to constitute harm.

3.3 Proposed Alignment

3.3.1 The assessment is primarily based on the Proposed Alignment that is presented on Figure 4.1: The Project (**application document 6.4**), and this also forms the basis of the design shown on the photomontages (**application document 5.8**). The assessment presented within this report also considers the flexibility provided by the Limits of Deviation (LoD), whereby the pylons and other project components could be located anywhere within the LoD.

3.3.2 The Proposed Alignment includes a proposed 400kV overhead line to the north-west of Hintlesham Hall as shown on Figure 8.6: Hintlesham Hall Assessment (**application document 6.4**). The proposed 400kV overhead line would run parallel to the existing 400kV overhead line, which lies approximately 310m from Hintlesham Hall. The proposed 400kV overhead line would lie at least 85m away from the existing 400kV overhead line based on safety and operational requirements.

3.3.3 To the north-west of College Farm, the proposed 400kV overhead line would use the existing alignment and pylons through Hintlesham Woods. The existing 400kV overhead line would be realigned (transposed) onto a new line of pylons around the north and western edges of the woodland (outside the former boundaries of Hintlesham Park).

3.3.4 National Grid has included embedded measure (EM-AB01) which notes that the Proposed Alignment to the north of Hintlesham Hall is based on the pylon locations from the optimised alignment discussed with English Heritage (now Historic England) in 2013.

National Grid would continue to work with Historic England as the designs develop to identify the most suitable location for the pylons in relation to the setting of Hintlesham Hall, taking into account the LoD and technical considerations such as distance between conductor spans.

4. Assessment

4.1 Introduction

- 4.1.1 Only one listed building lies within the Order Limits. This is the Grade II listed gate piers, gates and railings (NHLE UID 1036916), which lie at the entrance of the hotel drive. The Order Limits only include the hotel driveway, as temporary access needs to be provided to the glamping site to the north of the hall during construction. Therefore, there would be no physical or direct changes to any of the listed buildings.
- 4.1.2 The remaining assessment presented in this chapter focuses on the results of the assessment undertaken in relation to the setting of Hintlesham Hall, its ancillary buildings and the historic parkland around it. It starts with a discussion about the photomontages (**application document 5.8**) produced for the project as discussed in Section 4.2 and then uses these as evidence to support the assessment presented in Section 4.3.

4.2 Discussion of Photomontages

- 4.2.1 Photomontage locations have been identified within the local landscape to inform the heritage assessment, with location HV01 located specifically to understand the view north from the Hall's ancillary buildings. The location of the viewpoints was discussed and shared with the relevant planning authorities and Historic England.
- 4.2.2 The photomontages were created from images taken from within the historic Hintlesham Hall estate to illustrate the degree to which the project would change the setting of the Hall. The images, based on a central alignment within the LoD, represent a winter environment with minimum annual foliage, and with pylon locations based on the Proposed Alignment, shown on Figure 4.1: The Project (**application document 6.4**). As noted in Section 3.3, the pylons and other project components could be located anywhere within the LoD.

Photomontage HV-01 View North from Grade II* Listed Stables

- 4.2.3 Photomontage HV-01 (**application document 5.8**) was taken approximately 40m north of the entrance to the Grade II* listed Stables. This illustrates how the project would appear in winter directly to the north of the Hall and its ancillary outbuildings, from ground level. The image shows that the proposed 400kV overhead line is only partially visible to the right of the frame. It is difficult to discern any clear differences between the proposed 400kV overhead line as depicted on the image, and the existing 400kV overhead line.
- 4.2.4 The introduction of the proposed 400kV overhead line within the historic limits of Hintlesham Park, would comprise an encroachment nearer the designated Hall's ancillary buildings between 35m to 135m closer than the existing 400kV overhead line. Even though the two lines would be parallel, the visual setting within the northern portion of the former park would change, with its alteration of the skyline and its physical presence amounting to additional visual severance of the historic landscape. The development of an additional 400kV overhead line could therefore change the setting of the former historic park.
- 4.2.5 Through a change to the park, the setting of Hintlesham Hall and associated buildings would undergo an indirect impact, marginally detracting from the significance of the asset. However, the change in the Park's setting from the project would be in an area that has

already been compromised by past development, with the loss of much of the former park to conversion or reversion to arable land, plus the addition of a golf course and the existing 400kV overhead line.

- 4.2.6 Photomontage HV-01 demonstrates that the proposed 400kV overhead line would change a small part of its setting. That effect does not, however, sever any link between the asset and its original setting.

Photomontage AB-20 Looking West of Hintlesham Hall

- 4.2.7 Photomontage AB-20 (**application document 5.8**) presents the main view from Hintlesham Hall facing directly south-west towards Hintlesham Woods, down the former tree-lined avenue. The view from the driveway leading to Hintlesham Hall looks out across an area of flat arable fields bordered by intermittent hedgerows with trees. The fields extend to the mid ground where Hintlesham Wood contains longer views.
- 4.2.8 To the centre-right of the view beyond the A1071 is College Grove and there are individual trees along the A1071. The tops of pylons on the existing 400kV overhead line are just discernible above the woodland to the centre right of the view, but otherwise pylons are not a baseline element. Due to the amount of vegetation, there are some seasonal variations, and visibility is greater in winter than it is in summer.
- 4.2.9 The project involves the transposition of the existing 400kV overhead line onto a new set of pylons around the north and western sides of Hintlesham Woods (outside the former boundaries of Hintlesham Park). The proposed 400kV overhead line would then use the existing pylons through Hintlesham Woods. This would result in very little additional visual intrusion into the Hall's setting, as evidenced by the photomontage.

4.3 Assessment on Setting

- 4.3.1 This section sets out the results of the assessment, drawing on the evidence provided by the photomontages above and split into the themes set out within GPA3 (Historic England, 2017).

Location and Siting

- 4.3.2 The proposed 400kV overhead line north and west of Hintlesham Hall would result in an additional overhead line located closer to the Hall than the existing 400kV overhead line. The topography of the area to the immediate north and west of the Hall and its ancillary buildings is quite flat. There are existing areas of woodland and tree belts within this area which form visual screens in between the Hall and the proposed 400kV overhead line.
- 4.3.3 The proposed 400kV overhead line would not be visually intrusive on the Hall itself (View AB-20) irrespective of its exact location within the LoD. During the winter (worst case due to less screening from vegetation) the view would be limited, with the bottom quarter of the pylon closest to the Hall screened by trees. The remaining additional pylons at greater distance from the Hall are less visible from this location. Given the topography and the distance with which the project would be experienced from the immediate environs of the Hall, the pylon scale is diminished.
- 4.3.4 The proposed 400kV overhead line to the north and west of Hintlesham Woods lies within the historic boundaries of Hintlesham Park. An alignment within the LoD would affect the ability to appreciate one portion of this historic parkland from locations outside of the Hall

and the surviving parkland around it. Given the changes to the parkland over time, such as the loss of historic features like tree-lined avenues and the reversion of pasture to arable, the historic park makes only a minor positive contribution to the significance of the listed assets. The part of the setting affected does not retain its parkland character and there is no direct intervisibility between the Hall and this part of its setting. There are important views, as described in Section 2.3, that better reveal the significance of the Hall, for instance from the south-west of the Hall, looking north-east towards it, and these would be unaffected by the project.

- 4.3.5 The proposed 400kV overhead line would not interrupt any sightline or vista important to understanding or appreciating the group of buildings or their setting. The views between the listed buildings and the project are obscured by existing shrubs and trees and the project itself is visually permeable (comprising lattice steel pylons and conductors).
- 4.3.6 Given the distance between the proposed 400kV overhead line and the Hall, and the very limited extent to which the visual setting of the buildings would change, the magnitude of impact would amount to negligible. The proposed 400kV overhead line would not noticeably lessen a viewer's ability to appreciate the Hall within its setting or reduce understanding of the relationship between the Hall and its setting. The significance of effect would amount to no more than minor adverse.
- 4.3.7 Furthermore, cumulative change to setting would occur from the proposed 400kV overhead line in conjunction with the existing 400kV overhead line. GPA3 (Historic England, 2017) gives guidance on cumulative change. This states '*...Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting...consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset.*'
- 4.3.8 In light of the issue of cumulative change mentioned above, the extent to which the proposed 400kV overhead line would affect the setting of the historic parkland is measured by the additional visual intrusion of a second overhead line crossing its historic northern extents. The parallel overhead lines would pass through a zone which has changed in character since the mid-20th century, with the loss of formal parkland features via reversion to arable fields. The existing 400kV overhead line can be regarded as unsympathetic to the Hall and its setting. The addition of a second overhead line in parallel to the existing baseline could also be regarded as unsympathetic. However, it would not sever the link between the Hall and its setting, despite adding to the visual intrusion within a portion of the historic parkland, leading to a small amount of additional visual intrusion to the Hall and its ancillary buildings.

Form and Appearance

- 4.3.9 When viewed from the gardens (AB20) immediately adjacent to the Hall, there is only minimal additional prominence from the proposed 400kV overhead line in one part of the view during wintertime. This would be less during summer with the additional screening provided by more vegetation. The addition to the skyline is minimal over the existing overhead line. From view HV01 the pylons and overhead line from the Proposed Alignment are barely visible, despite the pylon height and scale. From the two viewpoints given, the proposed 400kV overhead line does not distract from the assets of the Hall and ancillary buildings.

- 4.3.10 The visual permeability of the proposed pylons and conductors is important in that as they do not block views behind them when looked at and do not cause excessive disruption to the skyline when viewed from distance.

Wider Effect of the Development

- 4.3.11 The project would not change the nature of the local landscape. The permeably visual nature of the proposed pylons and conductors and the pylon spacing, together with the small footprints of the pylon legs help retain the rural character of the local environment. None of the areas of existing mature vegetation would be lost, whether these be woodland or belts of trees that screen much of the project from the Hall. The general sense of space within the surviving historic parkland, and the area of former historic parkland north of the Hall would be retained.
- 4.3.12 The addition of the proposed 400kV overhead line would result in an alteration to the local skyline. This is demonstrated in the photomontage from viewpoint AB20 and would not vary significantly when allowing for location variation within the LoD. View HV01 doesn't demonstrate any discernible changes to the skyline from the proposed 400kV overhead line, even with the LoD variation would not result in any visual intrusion.

Permanence of the Development

- 4.3.13 The project is intended to be permanent, with a long operational life. However, the proposed 400kV overhead line is fully reversible. The dismantling of the existing 132kV overhead line 1km south-east of the Hall demonstrates that overhead lines need not be permanent should the components be no longer required in the future.

4.4 Limits of Deviation

- 4.4.1 Variations of the proposed 400kV overhead line within the flexibility provided by the LoD have been accounted for in this assessment. The potential changes to the setting of built heritage and historic landscapes are the same as for those of the Proposed Alignment.
- 4.4.2 Should the proposed 400kV overhead line be moved closer to the Hall and its ancillary buildings (or changes to the pylon location within the view) within the LoD, the degree to which their setting would change is so marginal as to not influence the effects identified within the assessment. This is due to the lack of visual impact that a closer overhead line would mean to the buildings when considering the key views described and the relocation within the same portion of Hintlesham Park that has been heavily degraded as an historic asset.

4.5 Summary of Effects

- 4.5.1 Hintlesham Hall and its ancillary buildings are high value heritage assets that would not experience any significant change in their value from the operational project, irrespective of the final alignment chosen within the LoD. The potential movement of the proposed 400kV overhead line within the LoD would make only a very limited change to the setting of the Hall, its ancillary buildings and the former and surviving historic parkland.
- 4.5.2 The setting of Hintlesham Park would experience a greater degree of change than the Hall and ancillary buildings. The greater degree of additional visual intrusion from the project is within an area already heavily affected in visual and historic setting terms, through the unsympathetic presence of the existing 400kV overhead line and 20th century

degradation of its historic parkland features respectively. Given this loss of asset value from recent historic activity, the change to the setting of the former historic parkland is less than would be experienced if it was still an area of pristine parkland, retaining all its original character.

- 4.5.3 The assessment has concluded that adverse effects brought by the project would not be significant.
- 4.5.4 In terms of NPS EN-1, **no substantial harm** would be experienced by the designated heritage assets. However, minor effects (not significant) are considered to constitute **harm** to the Hall and its ancillary buildings. Similarly, in terms of the NPPF policy, the project would result in **less than substantial harm**. This level of harm would be justified given the public benefits of the project, which enables the transmission of greater amounts of energy around the electricity network.
- 4.5.5 In accordance with EM-AB01, National Grid would continue to work with Historic England as the designs develop to identify the most suitable location for the pylons in relation to the setting of Hintlesham Hall, taking into account the LoD and technical considerations such as distance between conductor spans.

5. Discussion and Conclusion

- 5.1.1 The project includes a proposed 400kV overhead line to the north of Hintlesham, near the Grade I listed Hintlesham Hall and its Grade II* listed ancillary buildings. The proposed 400kV overhead line would also pass through the remains of its adjacent historic parkland within the LoD. The key purpose of this report was to set out whether the project would likely result in substantial harm on the listed buildings. As stated in Paragraph 5.8.14 of EN-1, '*Substantial harm to or loss of designated assets of the highest significance, including ... Grade I and II* listed buildings;... should be wholly exceptional*'. Based on the definitions provided in Section 1.3 of this report and the case law examples, substantial harm is '*a high test which may not arise in many cases*' (MCHLG, 2019).
- 5.1.2 This report has examined the baseline environment, with the status of the listed buildings considered along with the extent to which their visual, aesthetic and historic setting contributes to their sensitivity (value) as historic assets. The way in which the Hall and ancillary complex are appreciated in the local landscape was a key factor in determining the extent to which the proposed 400kV overhead line would affect the listed buildings and their setting. The latter includes the remains of the historic parkland that still surrounds the buildings and the views to and from the Hall in the wider landscape.
- 5.1.3 This report has demonstrated that the Hall's setting contributes to its value, with the remnants of surviving parkland exhibiting historic earthworks and historic landscape features like partially surviving tree avenues. However, the portion of the former parkland through which the project would pass (parallel to the existing 400kV overhead line) within the LoD makes only a limited contribution to the Hall's asset value.
- 5.1.4 Therefore, the proposed 400kV overhead line would affect the ability to appreciate a part of the setting that makes only a minor positive contribution to the Hall's overall significance. The asset has already been affected by the unsympathetic introduction of the existing 400kV overhead line. Whilst the addition of the proposed 400kV overhead line would have a further adverse effect, it would not cause any severance between the Hall and its ancillary buildings and its original setting, given the change that has already taken place.
- 5.1.5 In conclusion, the assessment has shown that the project would result in a loss of heritage significance. However, this is not considered to be so serious that it would lead to an inability to appreciate or understand the Hall or its relationship to its setting. This would not result in substantial harm it falls below the levels '*a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced*' and it is considered that the project would not seriously affect a key element of its special architectural or historic interest.
- 5.1.6 The report concludes that the degree of change to the historic assets would not result in substantial harm to Hintlesham Hall or its ancillary buildings. As set out in this report, minor non-significant effects constitute 'harm', and this degree of harm would be justified by the public benefit gained as a result of the project.

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