



**PLANNING ACT 2008 (AS AMENDED) – SECTION 88 AND THE  
INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010 (AS  
AMENDED) - RULE 6**

**REPRESENTATIONS OF THE HISTORIC BUILDINGS AND MONUMENTS  
COMMISSION FOR ENGLAND (HISTORIC ENGLAND)**

**APPLICATION BY NATIONAL GRID FOR AN ORDER GRANTING**

**DEVELOPMENT CONSENT FOR THE BRAMFORD TO TWINSTEAD  
REINFORCEMENT**

**APPLICATION REF: EN020002**

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## Written Representation: Historic England

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## Written Representation: Historic England

### 1) Introduction

- 1.1 The Historic Buildings and Monuments Commission for England (HBMCE), is better known as Historic England, and we are the Government's adviser on all aspects of the historic environment in England - including historic buildings and areas, archaeology, and historic landscape. We have a duty to promote conservation, public understanding, and enjoyment of the historic environment. HBMCE are an executive Non-Departmental public body and we answer to Parliament through the Secretary of State for Culture, Media & Sport.
- 1.2 In relation to section 88 of the Planning Act 2008 (as amended) and the infrastructure planning (examination procedure) rules 2010 (as amended) we are a statutory consultee with responsibilities within the terrestrial landscape.
- 1.3 We understand the proposal to be an electricity network reinforcement between Bramford Substation in Suffolk and Twinstead in Essex. The proposal includes the construction of c. 18 km of overhead line and 11 km of underground cable through the Dedham Vale AONB
- 1.4 The proposal would see the removal of a large section of the 132v power line and associated pylons leaving the new 400v line to run parallel with the existing 400v line around Hintlesham Hall.
- 1.5 The applicant has provided a full Environmental Statement, which includes a chapter on the historic environment (ES Chapter 8).
- 1.6 Historic England has been engaged in detailed pre-application discussions with the applicant.
- 1.7 In our Section 56 Representation (dated 21st July 2023, Our ref: PL00741042) we identified that this development has the potential to impact upon the historic environment.
- 1.8 Historic England's advice on designated heritage assets will be limited to the impact on the significance of Hintlesham Hall which lies to the south of the proposed line.
- 1.9 We have concerns regarding the limits of deviation around Hintlesham Hall.

### 2) Hintlesham Hall

#### Significance

- 2.1 Hintlesham Hall is a fine example of an older country house enlarged and re-ordered during the Georgian Era.
- 2.2 The core of the building dates from 1576 this was altered in the 1680s by Henry Timperley, and remodelled c1725-40 by Richard Powys. The 16th-century building is distinguished by its Georgian additions. Originally E-plan, the center arm was either removed or incorporated in the 18th-century facade.

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- 2.3 It is a grand elegant house, rendered and painted with stone dressings, and hipped plain tile roofs. The house is two stories with attics. Symmetrical southwest facade in 5 bays, flanked by 4 bay wings with 2 bay southwest elevations.
- 2.4 The hall is a grade I listed on account of its more than special architectural and historic interest.

### Impact of the Proposals

- 2.5 Document 6.3.8.2.1: ES Appendix 8.2 – Annex A Hintlesham Hall Assessment details the erosion of the historic parkland through the loss of historic features like tree-lined avenues and the reversion of pasture to arable.
- 2.6 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 the coach house.
- 2.7 We consider the area does contribute to the significance of the hall through its ability to inform the hall's historic context, standing in the landscape, and understanding its designed setting. This includes the area affected by the proposals.
- 2.8 The character of the parkland has already been eroded by the existing pylons and arable use. The change to the parkland setting through the introduction of an additional 400kV overhead line pylons would affect how the hall is experienced. This would result in harm to the significance that Hintlesham Hall derives from its setting.
- 2.9 The proposals would also change the views from the stable block of Hintlesham Hall and will be seen in conjunction with the hall and its landscape. This would also affect how the hall is experienced and result in harm to the significance that Hintlesham Hall derives from its setting.
- 2.10 We consider this would amount to less than substantial harm. The applicant is proposing to increase the existing planting in the area between the Hall, its stable block and the overhead line as a mitigation measure, While this would reduce visibility in winter months we do not consider it would reduce the level of harm notably.
- 2.11 We do not think the limits of deviation and potential changes to the positions of pylons RB3 and RB4 have been fully taken into account.

### 2.3 Policy

- 2.12 5.9.13 The applicant is encouraged, where opportunities exist, to prepare proposals that can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected. This can include, where possible:

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- enhancing, through a range of measures such a sensitive design, the significance of heritage assets or setting affected
- 2.13 5.9.15 Applicants should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
- 2.14 The avoidance of direct impact on designated assets is an important principle. Policy directs us towards sustaining and enhancing assets (see NPSNN 5.9.23) and great weight is given to their conservation in decision making (see NPSNN 5.9.25). Likewise, any impacts, significant effects or harm need clear and convincing justification (NPSNN 5.9.26).
- 2.15 In addition, Para 5.9.26 recognises that 'any' harmful impact on the significance of a designated heritage asset should be weighed against the public benefit, and that the greater the harm, the greater the justification that will be needed. In this case policy 5.9.30 is also relevant in that, 'Where the proposed development 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'.
- 2.16 The 2023 version of the National Planning and Policy Framework (NPPF) is also relevant in relation to the principles required to test this development. In particular, it establishes a presumption in favour of sustainable development in the planning system (paragraphs 7, 8, 10 and 11) which also identifies protection of the historic environment as an important element of achieving sustainable development. Further policy principles relating to the historic environment are set out in Chapter 16 of the NPPF.
- 2.17 Paragraph 199 requires the planning authorities to place 'great weight' on the conservation of designated heritage assets, and states that the more important the asset the greater the weight should be, 'this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.
- 2.18 Paragraph 200 States that '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'.
- 2.19 Paragraph 202 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'.

### Historic England's Position

- 2.20 In 2013 we expressed concerns relating to this proposed route and its impact upon the setting of the grade I listed hall. However, we accepted that undergrounding the cable in this area would cause damage to potentially

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important natural habitats. We stated that should the pylons be placed adjacent to the existing line then corridor 2b would be the most appropriate route for the new power cable.

- 2.21 The current route shown reflects that shown as corridor 2b at pre-application.
- 2.22 Historic England are concerned that the proposal will have a negative harmful impact upon the setting of the hall, this is because the change in character to its setting and the change to views from the stable block of Hintlesham Hall and will be seen in conjunction with the hall and its landscape. In our view this would result in less than substantial harm to Hintlesham Hall's significance.
- 2.23 The applicant is proposing to increase the existing planting in the area between the Hall, its stable block and the overhead line as a mitigation measure, while this would reduce visibility in winter months we do not consider it would reduce the level of harm notably.
- 2.24 The applicant has engaged in discussions to limit the visual impacts of the new overhead line in key views from Hintlesham Hall's stable block. We have worked hard to limit these views and have concerns that the limits of deviation could result in avoidable harm. We would therefore like to see additional measures added to protect the view out from the stable block of Hintlesham Hall (shown in viewpoint HV01) and prevent the relocation of pylons RB8 and RB9.
- 2.25 Enhancements have been put forward in the form of landscape restoration of some lost elements of the designed landscape of Hintlesham Park.
- 2.26 We understand the elements of the avenue proposed for restoration running southwest from the hall are based on historical evidence. The elements running alongside the road from north to south are speculative.
- 2.27 We consider restoring the avenue would be beneficial to Hintlesham Hall and its setting, through a greater understanding of the hall's context and status. This benefit would be more successful if the planting was an unbroken avenue.
- 2.28 In determining this application the inspector must carry out the planning balance. We particularly refer you to paragraph 5.9.26 which recognises that 'any' harmful impact on the significance of a designated heritage asset should be weighed against the public benefit, and that the greater the harm, the greater the justification that will be needed.

### 3) Specific Comments on Chapters

#### 3.1 Comments on the draft Development Consent Order PINS Document reference

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- 3.1.1 We have raised several concerns regarding the limits of deviation (article 5) around Hintlesham Hall. Historic England has spent considerable time with the applicant considering the location of pylons RB3 and RB4 in this location to prevent unnecessary harm to the highly graded listed building.
- 3.1.2 Building to the extent of the proposed limits of deviation would increase the pylon's prominence and impact on the setting of Hintlesham Hall.

### **3.2 Comments about the Environmental Statement: Chapter 8 Historic Environment.**

- 3.2.1 The applicant has provided a full Environmental Statement, which includes a chapter on the Historic Environment (Chapter 8, supported by Appendices 8.2 Historic environment impact assessment and 8.2 annex a Hintlesham Hall). We do not have any specific comments to make on the majority of designated heritage assets assessed in this document but focus on the two annexe documents relating to Hintlesham Hall.

### **3.3 Comments about Document 6.3.8.2.1: ES Appendix 8.2 – Annex A Hintlesham Hall Assessment.**

- 3.3.1 We broadly accept the findings of ES Appendix 8.2 – Annex A Hintlesham Hall Assessment. Except the assessment of the impact on Hintlesham Hall and its consideration of the line of deviation. We do not think the limits of deviation and potential changes to the positions of pylons RB3 and RB4 have been fully taken into account.
- 3.3.2 Photomontage HV-01 shows the proposed development with the pylons located as negotiated. However, if they were positioned differently along the line the proposal's impact would be greater.
- 3.3.3 The document concludes the effect would amount to no more than minor adverse. We consider the impact would be adverse if the proposed pylon RB3 was moved southwest on the line or RB4 was moved northeast on the line. We agree with the conclusion of the report "that the degree of change to the historic assets would not result in substantial harm to Hintlesham Hall or its ancillary buildings".
- 3.3.4 We recommend the assessment of the setting of, and impact of the proposed development on, taking into account the potential locations of the pylons RB3 and RB4 is reconsidered by the applicant and, where appropriate, the document revised and reissued for examination.
- 3.3.5 We would recommend that proposals should provide a more definite location for the pylons further limiting their relocation.

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### 3.4 Comments about 7.4 Environmental Gain Report

- 3.4.1 Document 7.4 Environmental Gain Report includes details of ENV02: Hintlesham Hall (APP-176). The document states “Enhancement planting along the historical avenue would help improve and enhance the existing parkland outside of the house to reflect the original design intent and benefit heritage setting.”
- 3.4.2 In particular avenue planting is proposed running southwest from the hall, in two small sections and along the A1071 north to south.
- 3.4.3 We would encourage a more comprehensive scheme of planting.

### 4. Conclusion

- 4.1 We have provided detailed advice in our written representation about the scheme, the assessment, and comments on the documents that have been submitted for examination.
- 4.2 We have concluded that the development would result in harm to these designated heritage assets. We have concluded this would be less than substantial in nature.
- 4.3 Historic England is broadly content with the proposed layout and design of the proposals around Hintlesham Hall. We do have concerns regarding the layout of pylons RB3 and RB4 in this area and the limits of deviation. We would therefore like to see additional measures added to protect the view out from the stable block of Hintlesham Hall (shown in viewpoint HV01) and prevent the relocation of pylons RB8 and RB9.
- 4.4 The applicant is proposing to increase the existing planting in the area between the Hall, its stable block and the overhead line as a mitigation measure, while this would reduce visibility in winter months we do not consider it would reduce the level of harm notably.
- 4.5 Our advice includes comments about the limits of deviation and the proposed enhancement planting.
- 4.6 We would recommend these comments be addressed, and additional information and clarification provided by the applicant. We would expect revised documents, addressing these comments, to be reissued for examination.
- 4.7 In determining this application the inspector must carry out the planning balance. We particularly refer you to paragraph 5.9.26 which recognises that 'any' harmful impact on the significance of a designated heritage asset should be weighed against the public benefit, and that the greater the harm, the greater the justification that will be needed.



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**ENDS**