



Bramford to Twinstead Casework Team

*By Email Only*

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Dear Casework team

**Re: Examiners 2nd written Questions - Historic England Response**

Please find below Historic England response to the ExA 2nd written questions

ExQ 2	Who	Question	Historic England response
HE2.8.8	Historic England	The signed SoCG between the Applicant and Historic England submitted at Deadline 5 confirmed that all matters are agreed, apart from the detail and wording of the proposed embedded measure EM-AB01 relating to pylon positioning restrictions to the north of Hintlesham Hall, which was noted as being still under discussion. There appeared to be no update at Deadline 6. When are the two parties' final positions on this matter likely to be	The applicant has proposed an amended Measure (EM-AB01) which is captured in the REAC  We felt this was sufficient to resolve the outstanding matter in the SoCG and all matter are now agreed.





		submitted into the Examination?	
HE2.8.9	The Applicant Historic England Suffolk Preservation Society Babergh and Mid Suffolk District Councils Suffolk County Council	In relation to the potential impacts of the Proposed Development on Hintlesham Hall (including the associated listed buildings, and the overall setting) could you outline your understanding of the applicable legal and policy framework in respect of 'avoidable harm'?  If it was to be assumed for the purposes of this question that there was agreement that the pylons and the overhead line could be located anywhere within the proposed Limits of Deviation without causing substantial harm to the listed buildings at Hintlesham Hall, to what extent would it be important in legal and policy terms that the degree of harm was nevertheless kept to the minimum possible level, so as not to cause 'avoidable harm'?	Avoidance of conflicts between the conservation of a heritage asset's and the impact of an application is at the heart of the policies in both EN_1 (e.g. 5.9.22) and NPPF (Para 201). This includes the contribution made to the significance of a heritage asset from its setting.  Broadly speaking further reducing harm will reduce the overall impact of a scheme on the significance of an asset and would be more favourable when weighing the balance between harm and public benefits. We agree that minimising harm, and approaches to development that seek to further reduce harm to heritage assets also would follow the principle of avoidance.  In all cases where there is harm, whether or not this is substantial or less than substantial, the policy is still clear that 'any' harm requires a clear and convincing justification (EN_1 5.9.26 and NPPF 206) and that harm will need to be weighed appropriately by the decision maker against the public benefits of the proposal (EN_1 5.9.30 and NPPF 208). This is mindful that 'great weight' needs to be given to an asset's conservation, and that the more important the asset the greater the weight should be EN_1 5.9.25 and NPPF 205).

Yours sincerely

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