

Sea Link

Volume 6: Environmental Statement

Document: 6.2.2.3
Part 2 Suffolk
Chapter 3
Cultural Heritage

Planning Inspectorate Reference: EN020026

Version: A
March 2025

Infrastructure Planning (Applications: Prescribed Forms and
Procedure) Regulations 2009 Regulation 5(2)(a)

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3. Cultural Heritage

3.1 Introduction

- 3.1.1 This chapter of the Environmental Statement (ES) presents the assessment of the likely significant cultural heritage effects that could result from the Proposed Project (as described in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**). It specifically identifies and proposes mitigation measures to address the potential impacts and likely significant effects of the Proposed Project on cultural heritage associated with the Suffolk Onshore Scheme, during the construction, operation and maintenance, and decommissioning of the Proposed Project.
- 3.1.2 The Order Limits, which illustrate the boundary of the Proposed Project, are shown on **Application Document 2.2.1 Overall Location Plan** and the Suffolk Onshore Scheme Boundary is illustrated on **Application Document 2.2.2. Suffolk Location Plan**.
- 3.1.3 This chapter should be read in conjunction with:
- **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**;
 - **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology**;
 - **Application Document 6.2.1.6 Part 1 Introduction Chapter 6 Scoping Opinion and EIA Consultation**; and
 - **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**.
- 3.1.4 This chapter is supported by the following figures:
- **Application Document 6.4.2.3 Cultural Heritage**; and
 - **Application Document 6.4.2.1.10 Representative Viewpoint Visualisations (Landscape and Visual)** and **Application Document 6.4.2.3.8 Representative Viewpoint Visualisations (Cultural Heritage)**.
- 3.1.5 This chapter is supported by the following appendices:
- **Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report**;
 - **Application Document 6.3.2.3.B Appendix 2.3.B Cultural Heritage Gazetteers**;
 - **Application Document 6.3.2.3.C Appendix 2.3.C Site Photos**;
 - **Application Document 6.3.2.3.D Appendix 2.3.D Geophysical Survey Report**;
 - **Application Document 6.3.2.3.E Appendix 2.3.E Aerial Photography and LiDAR Report**; and
 - **Application Document 6.3.2.3.F Appendix 2.3.F Draft Archaeological Evaluation Trenching Report**.
- 3.1.6 This chapter is supported by the following application documents:

- **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan (CEMP);**
- **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice;**
- **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC); and**
- **Application Document 7.5.4.1 Suffolk Outline Onshore Overarching Written Scheme of Investigation.**

3.2 Regulatory and Planning Context

- 3.2.1 This section sets out the legislation and planning policy that is relevant to the cultural heritage effects assessment. A full review of compliance with relevant national and local planning policy is provided within the **Application Document 7.1 Planning Statement** submitted as part of the application for Development Consent.
- 3.2.2 Policy generally seeks to minimise cultural heritage effects from development and to avoid significant adverse effects. This applies particularly to physical impacts on assets, as well as permanent impacts arising from change to the setting of heritage assets.

Legislation

- 3.2.3 Legislation that has been considered in this chapter includes:
- The Ancient Monuments and Archaeological Areas Act 1979 (The Ancient Monuments and Archaeological Areas Act 1979, 2024);
 - The Planning (Listed Buildings and Conservation Areas) Act 1990 (Planning (Listed Buildings and Conservation Areas) Act 1990, 2024); and
 - The Hedgerows Regulations 1997 (The Hedgerows Regulations, 1997).

Ancient Monuments and Archaeological Area Act 1979

- 3.2.4 The Ancient Monument and Archaeological Areas Act (1979) ('the Act') is the central piece of legislation for the protection of the archaeological resource (The Ancient Monuments and Archaeological Areas Act 1979, 2024). The first section of the Act requires the Secretary of State to maintain a schedule of nationally important sites. For the purpose of the Act, a monument is defined as:

"a) any building, structure or work, whether above or below the surface of the land, and any cave or excavation;

b) any site comprising the remains of any such building, structure or work or of any cave or excavation; and

c) any site comprising, or comprising the remains of, any vehicle, vessel, aircraft or other moveable structure or part thereof which neither constitutes nor forms part of any work which is a monument as defined within paragraph a) above; d) and any machinery attached to a monument shall be regarded as part of the monument if it could not be detached without being dismantled' (Section 61 (7))."

- 3.2.5 The Act further defines an ancient monument as: *"any Scheduled Monument; and any other monument which in the opinion of the Secretary of State is of public interest by*

reason of the historic, architectural, traditional, artistic or archaeological interest attaching to it' (Section 61 (12))."

- 3.2.6 A set of criteria, defined as survival/condition, period, rarity, fragility/vulnerability, diversity, documentation, group value and potential (Annex A, Scheduled Monuments & nationally important but non-scheduled monuments, Department for Culture Media & Sport, October 2013), assist in the decision-making process as to whether an asset is deemed of national importance and best managed by scheduling.

The Planning (Listed Buildings and Conservation Areas Act) 1990

- 3.2.7 The Listed Buildings and Conservation Areas Act ('LBCA Act') sets out the principal statutory provisions which must be considered in the determination of any application affecting either listed buildings or conservation areas (Planning (Listed Buildings and Conservation Areas) Act 1990, 2024).
- 3.2.8 Section 66 of the LBCA Act states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 3.2.9 Section 72 of the LBCA Act establishes that special attention be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area.

The Hedgerow Regulations 1997

- 3.2.10 The Hedgerows Regulations 1997 specify the criteria for identifying whether a hedgerow could be classed as important and, if identified as such, permission is required from the local authority to remove it. The criteria for establishing importance, as set out in Section 4 of the Regulations, and Part II of Scheduled I, includes if a hedgerow marks a pre-1850 parish or town boundary, incorporates any archaeological features, is part of or associated with a pre-1600 estate or manor, or forms an integral part of a pre-Parliamentary enclosure field system.

National Policy

National Policy Statements

- 3.2.11 National Policy Statements (NPS) set out the primary policy tests against which the application for a Development Consent Order (DCO) for the Proposed Project would be considered. Table 3.1 and Table 3.2 below provide details of the elements of the NPS for Energy (EN-1) (Department for Energy Security and Net Zero, 2023) and NPS for Electricity Networks Infrastructure (EN-5) (Department for Energy Security and Net Zero, 2023) that are relevant to this chapter. The assessment has had regard to all the policies relevant to cultural heritage and not just those listed in the table below. NPS EN-3 Renewable Energy Infrastructure has relevance to the Proposed Project, but only in respect of the offshore elements. As such it has no relevance to the assessment presented in this chapter.

Table 3.1 NPS EN-1 requirements relevant to cultural heritage

NPS EN-1 section	Where this is covered in the ES
<p>5.9.6 <i>“Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments or Protected Wreck Sites should be considered subject to the policies for designated heritage assets.”</i></p>	<p>A review of previously recorded non-designated heritage assets, as well as assets identified as part of the assessment process, has been undertaken with the results synthesised in Section 4.1 and Section 6.1 of the Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report. This has not identified any non-designated assets of schedulable quality.</p>
<p>5.9.7 <i>“The Secretary of State should also consider the impacts on other non-designated heritage assets (as identified either through the development plan making process by plan-making bodies, including ‘local listing’, or through the application, examination and decision-making process). This is on the basis of clear evidence that such heritage assets have a significance that merits consideration in that process, even though those assets are of lesser significance than designated heritage assets.”</i></p>	<p>Non-designated assets within the Study Area have been used to inform the baseline, and these are synthesised in the Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report, with the supporting documents provided in: Application Document 6.2.2.3.B Appendix 2.3.B Cultural Heritage Gazetteers; Application Document 6.3.3.3.C Appendix 2.3.C Site Photos; Application Document 6.3.2.3.D Appendix 2.3.D Geophysical Survey Report; Application Document 6.3.2.3.E Appendix 2.3.E Aerial Photographic and LiDAR Report; and Application Document 6.3.2.3.F Appendix 2.3.F Draft Archaeological Evaluation Trenching Report. Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report, Section 6, provides an overview of each asset within the Order Limits, with their sensitivity (value) provided.</p> <p>An assessment of assets potentially affected by the Proposed Project has been undertaken, and this is detailed in Section 3.9 of this chapter.</p>
<p>5.9.9 <i>“The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES (see Section 4.3). This should include consideration of heritage assets above, at, and</i></p>	<p>A proportionate assessment of potential impacts, both physical and on setting, to above and below ground heritage assets, has been undertaken. The assessment includes potential impacts to historic landscape features.</p>

NPS EN-1 section	Where this is covered in the ES
<p><i>below the surface of the ground. Consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment. The assessment should include reference to any historic landscape or seascape character assessment and associated studies as a means of assessing impacts relevant to the proposed project.”</i></p>	<p>This can be found in Section 3.9 of this chapter.</p> <p>Intra-Project and Inter-Project cumulative effects to heritage assets have been assessed with the results presented in Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects and Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects.</p>
<p>5.9.10 “...the applicant should provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum, the applicant should have consulted the relevant Historic Environment Record (or, where the development is in English or Welsh waters, Historic England or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development’s impact.”</p>	<p>In line with the requirements of the policy, a number of data sources, including the relevant Historic Environment Record, were consulted as part of the cultural heritage assessment. These are synthesised in the Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report, which also includes a section detailing the significance of the designated and non-designated assets. The supporting documents which were used to inform the baseline, as well as assigning significance, are provided in: Application Document 6.3.2.3.B Appendix 2.3.B Cultural Heritage Gazetteers; Application Document 6.3.2.3.C Appendix 2.3.C Site Photos; Application Document 6.3.2.3.D Appendix 2.3.D Geophysical Survey Report; Application Document 6.3.2.3.E Appendix 2.3.E Aerial Photographic and LiDAR Report; and Application Document 6.3.2.3.F Appendix 2.3.F Draft Archaeological Evaluation Trenching Report.</p> <p>An assessment of assets potentially affected by the Proposed Project has been undertaken, and this is detailed in Section 3.9 of this chapter.</p>
<p>5.9.11 “Where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the</p>	<p>A desk-based assessment has been undertaken with the result provided in Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report. Full details of works undertaken, including a review of LiDAR data and aerial photographs, geophysical</p>

NPS EN-1 section	Where this is covered in the ES
<p><i>interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, representative visualisations may be necessary to explain the impact.”</i></p>	<p>survey, and evaluation trenches, is provided in Application Document 6.3.2.3.C Appendix 2.3.C Site Photos; Application Document 6.3.2.3.D Appendix 2.3.D Geophysical Survey Report; Application Document 6.3.2.3.E Appendix 2.3.E Aerial Photographic and LiDAR Report; and Application Document 6.3.2.3.F Appendix 2.3.F Draft Archaeological Evaluation Trenching Report.</p> <p>Visualisations have also been produced to support the setting assessment and are provided in Application Document 6.4.2.1.10 Representative Viewpoint Visualisations (Landscape and Visual) and Application Document 6.4.2.3.8 Representative Viewpoint Visualisations (Cultural Heritage).</p>
<p>5.9.12 <i>“The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents. Studies will be required on those heritage assets affected by noise, vibration, light and indirect impacts, the extent and detail of these studies will be proportionate to the significance of the heritage asset affected.”</i></p>	<p>A holistic approach has been taken to the assessment, with the potential for impacts from aspects such as noise, vibration and lighting considered.</p> <p>The detailed assessment is provided in Section 3.9 of this chapter.</p>
<p>5.9.13 <i>“The applicant is encouraged, where opportunities exist, to prepare proposals which 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:</i></p> <ul style="list-style-type: none"> <i>• enhancing, through a range of measures such a sensitive design, the significance of heritage assets or setting affected</i> <i>• considering where required the development of archive capacity which could deliver significant public benefits</i> <i>• considering how visual or noise impacts can affect heritage assets, and whether there may be opportunities to enhance access to, or interpretation, understanding and appreciation of, the heritage assets affected by the scheme.”</i> 	<p>An assessment of effect on heritage assets, and impacts arising from changes to their setting, including visual change, has been undertaken. The assessment is based on the significance of the asset, as described in the baseline report (Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report), with the assessment provided in Section 3.9 of this chapter and mitigation measures identified in Sections 3.8 and 3.10.</p>
<p>5.9.14 <i>“Careful consideration in preparing the scheme will be required on whether the impacts</i></p>	<p>In line with the requirements of the policy, Section 3.8 of this chapter details how the</p>

NPS EN-1 section	Where this is covered in the ES
<i>on the historic environment will be direct or indirect, temporary, or permanent”.</i>	Suffolk Onshore Scheme has been carefully considered to avoid, reduce or mitigate likely significant effects on cultural heritage assets. Where impacts are assessed, consideration is given to the direct, indirect, temporary or permanent nature of the impact, as set out in Section 3.4 of this chapter.
5.9.16 <i>“A documentary record of our past is not as valuable as retaining the heritage asset, and therefore the ability to record evidence of the asset should not be a factor in deciding whether such loss should be permitted, and whether or not consent should be given”.</i>	Noted. The assessment of impacts is provided in Section 3.9 of this chapter, and this details where an assets will be totally lost, or partially lost as part of the assessment.
5.9.17 <i>“Where the loss of the whole or part of a heritage asset’s significance is justified, the Secretary of State will require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of the requirement should be proportionate to the asset’s importance and significance and the impact. The applicant should be required to publish this evidence and to deposit copies of the reports with the relevant Historic Environmental Record. They should also be required to deposit the archive generated in a local museum or other public repository willing to receive it.”</i>	A programme of archaeological mitigation which sets out the requirements for the recording of heritage assets that will be lost as a result of the Project is detailed in Application Document 7.5.4.1 Suffolk Outline Onshore Overarching Written Scheme of Investigation . The Outline Onshore Overarching Written Scheme of Investigation includes requirements for impacted heritage assets to be recorded and published and for copies of the reports to be submitted to the relevant HER, and also requires agreement to be made with the relevant local museum to receive the archive.
5.9.27 <i>“When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset’s conservation. 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.”</i>	The Proposed Project has been designed to avoid physical impacts to all designated heritage assets, although there is the potential for impacts to the setting of designated assets. Where impacts cannot be avoided, they have been assessed in Section 3.9 of this chapter, while additional mitigation is provided in Section 3.10 of this chapter. Provisional information regarding mitigation proposed is also provided in Application Document 7.5.4.1 Suffolk Outline Onshore Overarching Written Scheme of Investigation .
5.9.28 <i>“The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction,</i>	Noted. An assessment of impact to the heritage significance of assets is included in Section 3.9 of this chapter.

NPS EN-1 section	Where this is covered in the ES
<i>or from development within its setting) should require clear and convincing justification.”</i>	
5.9.29 <i>“Substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional.”</i>	The assessment (Section 3.9) has confirmed that there would be no substantial harm or loss of significance to any grade II Listed Building or a grade II Registered Park or Garden. A Heritage Statement which confirms there would be no substantial harm to the grade II Listed Buildings assessed in this chapter is presented in Application Document 7.1 Planning Statement .
5.9.30 <i>“Substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and II* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional.”</i>	The assessment (Section 3.9) has confirmed that there would be no impact, and therefore no substantial harm or loss of significance to Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and II* Registered Parks and Gardens; and World Heritage Sites.
5.9.31 <i>“Where the proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss, or all the following apply:</i> <ul style="list-style-type: none"> • <i>the nature of the heritage asset prevents all reasonable uses of the site;</i> • <i>no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;</i> • <i>conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and</i> • <i>the harm or loss is outweighed by the benefit of bringing the site back into use.”</i> 	A Heritage Statement which confirms there would be no substantial harm or total loss of significance to designated heritage assets is presented in Application Document 7.1 Planning Statement .
5.9.36 <i>“When considering applications for development affecting the setting of a designated heritage asset, the Secretary of State should give</i>	Impacts to designated heritage assets arising from setting change from the

NPS EN-1 section	Where this is covered in the ES
<i>appropriate weight to the desirability of preserving the setting such assets and treat favourably applications 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, the Secretary of State should give great weight to any negative effects, when weighing them against the wider 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.”</i>	operational phase of the Proposed Project are assessed in Section 3.9. A Heritage Statement, presented in Appendix E of Application Document 7.1 Planning Statement , confirms there would be no substantial harm or total loss of significance to designated heritage assets as a result of setting change.

Table 3.2 NPS EN-5 requirements relevant to cultural heritage

NPS EN-5 section	Where this is covered in the ES
2.2.10 “As well as having duties under Section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to “have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and ...do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.”	In line with the requirements of the policy, Section 3.8 of this chapter details how the Suffolk Onshore Scheme has been designed with careful regard to cultural heritage assets, with embedded mitigation measures used to avoid or reduce impacts where practicable.
With regard to underground and subsea cables, 2.9.24 of the policy states the Secretary of State must weigh the feasibility, cost, and any harm of underground or subsea options against aspects such as the adverse implications of overhead line options, the cost and feasibility of re-routing overhead line options and mitigation proposals, as well as the cost and feasibility of the reconfiguration, rationalisation, and/or reuse of underground cabling of proximate existing or proposed electricity network infrastructure. It goes on, in 2.9.25 of the policy, to state “the Secretary of State should only grant	The assessment of impacts relating to cultural heritage is covered in Section 3.9, while mitigation is covered in Sections 3.8 and 3.10 The use of alternative technologies (OHL versus underground cable) was considered at the strategic options stage as reported within Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternative Considered . The assessment of impacts relating to cultural heritage is covered in

NPS EN-5 section	Where this is covered in the ES
<p><i>development consent for underground or subsea sections of a proposed line over an overhead alternative if they are satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents, the mitigation hierarchy has been followed, and that any technical obstacles associated with it are surmountable”. And in this context the Secretary of State should consider, “ the additional cost of the proposed underground or sub-sea alternatives, including their significantly higher lifetime cost of repair and later uprating”, and the potentially very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage assets, marine environments, soil (including peat soils), hydrology, geology, and, for a substantial time after construction, landscape and visual amenity. (Undergrounding an overhead line will mean digging a trench along the length of the route, and so such works will often be disruptive – albeit temporarily – to the receptors listed above than would an overhead line of equivalent rating)”.</i></p>	<p>Section 3.9, while mitigation is covered in Sections 3.8 and 3.10.</p> <p>It should be noted than an overhead line alternative would have the potential to result in larger impacts to heritage assets, as the presence of the above ground infrastructure may introduce highly visible change into the setting of heritage assets. Conversely, overhead lines may result in fewer impacts to buried heritage assets as cable trenches would not need to be excavated.</p>

National Planning Policy Framework

- 3.2.12 The National Planning Policy Framework (NPPF) as revised in December 2024 (Ministry of Housing, Communities and Local Government, 2024) sets out national planning policies that reflect priorities of the Government for operation of the planning system and the economic, social, and environmental aspects of the development and use of land. The NPPF has a strong emphasis on sustainable development, with a presumption in favour of such development. The NPPF has the potential to be considered important and relevant to the Secretary of State (SoS) consideration of the Proposed Project.
- 3.2.13 Table 3.3 below provides details of the elements of the NPPF that are relevant to this chapter, and how and where they are covered in the ES.

Table 3.3 NPPF requirements relevant to cultural heritage

NPPF section	Where this is covered in the ES
Section 16 of the NPPF deals specifically with the historic environment. Where changes are proposed, the NPPF sets out a clear framework to ensure that heritage assets are conserved, and where	An assessment of heritage value, as well as the setting of assets, has been undertaken as part of the assessment and is set out in Application Document 6.3.2.3.A Appendix 2.3.A

NPPF section	Where this is covered in the ES
appropriate enhanced, in a manner that is consistent with their significance.	Cultural Heritage Baseline Report as well as the assessment which is covered in Section 3.9 of this chapter.
The NPPF sets out the importance of being able to assess the significance of heritage assets that may be affected by a development. Significance is defined in Annex 2 of the NPPF as being the <i>“value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic”</i> . Significance is not only derived from an asset's physical presence, but also from its setting. The setting of a heritage asset is defined in Annex 2 as <i>“the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve”</i> .	An assessment of heritage value, as well as the setting of assets, has been undertaken as part of the assessment and is set out in Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report as well as the assessment which is covered in Section 3.9 of this chapter.
Paragraph 207 of the NPPF states that <i>“in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected including any contribution made by their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance”</i> . Similarly, paragraph 208 includes a requirement on local planning authorities, having assessed the particular significance of any heritage asset that may be affected by a proposal, to take this into account when considering the impact of a proposal on a heritage asset.	An assessment of heritage value, as well as the setting of assets, has been undertaken as part of the assessment and is set out in Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report as well as the assessment which is covered in Section 3.9 of this chapter.
Paragraphs 212 to 216 of the NPPF introduce the concept that heritage assets can be harmed or lost through alteration, destruction or development within their setting. This harm ranges from less than substantial through to substantial. With regard to designated assets, paragraph 212 states that great weight should be placed on its conservation, irrespective of whether any potential harm is considered to be substantial or less than substantial. The paragraph goes further to say that the more important the asset, the greater the weight should be on its conservation. In paragraph 213, a distinction is made in respect of those assets of the highest significance (e.g., scheduled monuments, Grade I and Grade II* listed buildings) where substantial harm to or loss should be wholly exceptional.	Based on the design, there are no physical impacts predicted on designated assets.
Paragraph 214 states that in instances where development would cause substantial harm to or total loss of significance of a designated asset, consent	Based on the design, there are no physical impacts predicted on designated assets, or situations where

NPPF section	Where this is covered in the ES
<p>should be refused unless it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh that harm or loss.</p> <p>Paragraph 215 says in instances where development would cause less than substantial harm to the significance of a designated asset, the harm should be weighed against the public benefits of the proposal to provide a balanced judgement.</p>	<p>the Proposed Project would result in substantial harm. However, there are cases where less than substantial harm has been identified as a result of impacts to the setting of designated assets. Potential impacts to the setting of the designated assets are detailed in Section 3.9 of this chapter and also in the Heritage Statement presented in Appendix E of Application Document 7.1 Planning Statement).</p> <p>To inform the planning balance, the benefits of the Proposed Project are detailed in Application Document 7.1 Planning Statement.</p>
<p>With regard to non-designated assets, paragraph 216 states that the effect of the application on the significance of the asset should be considered in determining the application. A balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.</p>	<p>An assessment of significance, as well as the setting of assets, has been undertaken as part of the assessment process. The full detailed impact assessment is provided in Section 3.9 of this chapter.</p>

National Planning Practice Guidance

- 3.2.14 The Planning Practice Guidance (PPG) provides further advice and guidance that expands the policy outlined in the NPPF. It expands on terms such as ‘significance’ and its importance in decision making. The PPG clarifies that being able to properly assess the nature, extent and the importance of the significance of the heritage asset and the contribution of its setting, is crucial to understanding the potential impact and acceptability of development proposals (paragraph 007 Reference ID: 18a-007-20190723).
- 3.2.15 The PPG states that in relation to setting, a thorough assessment of the impact on setting needs to take in to account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it (paragraph 013; Reference ID: 18a-013-20190723).
- 3.2.16 The PPG discusses how to assess if there is substantial harm. It states that what matters in assessing if a proposal causes substantial harm is the impact on the significance of the asset. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed (paragraph 018; Reference ID: 18a-018-20190723).
- 3.2.17 The NPPF indicates that where development would result in substantial harm, it is necessary to achieve substantial public benefits that outweigh that harm. Where less than substantial harm is identified, the degree of harm should be considered alongside any public benefits that can be delivered by development. The PPG states that these benefits should flow from the proposed development and should be of a nature and scale to be of benefit to the public and not just a private benefit and would include

securing the optimum viable use of an asset in support of its long-term conservation (paragraph 020; Reference ID: 18a-020-20190723).

Local Planning Policy

- 3.2.18 The Suffolk Onshore Scheme (refer to **Application Document 2.2.2 Suffolk Location Plan**) lies within the jurisdiction of Suffolk County Council (SCC) and East Suffolk Council (ESC). The planning policies which are relevant to the study of cultural heritage and that have informed the assessment of effects in this chapter are as follows:
- Suffolk County Council’s Energy and Climate Adaptive Infrastructure Policy (Suffolk County Council, 2023);
 - Suffolk Coastal Local Plan (East Suffolk Council, 2020); and
 - East Suffolk Council Historic Environment Supplementary Planning Document (SPD) (East Suffolk Council, 2021).
- 3.2.19 Suffolk County Council (Suffolk County Council, 2023) has published its policy for dealing with energy proposals in the county of Suffolk, and how the Council will engage and influence other parties to ensure adverse impacts are understood and addressed. In relation to cultural heritage, the Energy and Climate Adaptive Infrastructure Policy ask developers to recognise that their proposals will conflict with the character of the county’s natural and historic environment. Further to this, the Council “*will expect project promoters to minimise and mitigate any impacts. Where there is residual harm that cannot be mitigated, this must be appropriately compensated for*”.
- 3.2.20 East Suffolk Council SDP (East Suffolk Council, 2021) on the historic environment provides guidance on how the policies contained within the Suffolk Coastal Local Plan (East Suffolk Council, 2020) can be enacted, specifically policies SCLP10.4; SCLP11.1; SCLP11.3; SCLP11.4; SCLP11.5; SCLP11.6; SCLP11.7, and SCLP11.8 which are detailed in Table 3.4.
- 3.2.21 Local planning policy for ESC consists of two parts; the Suffolk Coastal Local Plan and the Waveney Local Plan. The Proposed Project is located outside of the area covered by the Waveney Local Plan. There are no county specific policies relevant to this assessment.
- 3.2.22 Suffolk Coastal Local Plan policies which are relevant to cultural heritage matters and have informed the cultural heritage assessment are detailed in Table 3.4.

Table 3.4 Local planning policies relevant to cultural heritage – Suffolk Coastal Local Plan

Suffolk Coastal Local Plan - Policy	Where this is covered in the ES
SCLP10.4: Landscape Character <i>While principally a policy dealing with the natural environment, the policy also covers manmade features that contribute to the significance/character of an area, and that are identified in the Landscape Character Assessment</i>	The character of the natural and manmade landscape and how this may contribute to the experience, setting, and heritage significance of heritage assets is considered in Section 3.9 of this chapter.

Suffolk Coastal Local Plan - Policy	Where this is covered in the ES
<p>SCLP11.1: Design Quality</p> <p><i>This policy details the importance of input into the design of developments to take into account elements such as important landscape features, architectural distinctiveness of an area, and the character of an area.</i></p>	<p>In line with the policy requirements, the importance of local character and distinctiveness, particularly where this contributed to the setting and significance of heritage assets, was considered in collaboration with the wider team, including landscape and ecology, during the development of landscape planting proposals, detailed in Application Document 7.5.7.1 Outline Landscape and Ecological Mitigation Plan.</p>
<p>SCLP11.3: Historic Environment</p> <p><i>The policy states that “the policies of the National Planning Policy Framework will be applied in respect of designated and non-designated heritage assets. All development proposals which have the potential to impact on heritage assets or their settings should be supported by a Heritage Impact Assessment and/or an Archaeological Assessment prepared by an individual with relevant expertise. Pre-application consultation with the Council is encouraged to ensure the scope and detail of a Heritage Impact Assessment or Archaeological Assessment is sufficient. The level of detail of a Heritage Impact Assessment should be proportionate to the scheme proposed and the number and significance of heritage assets affected.”</i></p>	<p>Potential impacts to heritage assets, including impacts from change to their setting, are assessed in Section 3.9 of this chapter. A Heritage Statement and assessment of harm is presented in Appendix E of Application Document 7.1 Planning Statement. Consultation has been undertaken with stakeholders including SCC and ESC throughout the EIA process to agree baseline methodology and the scope of field surveys undertaken to further inform the baseline and impact assessment.</p> <p>Where feasible, the Proposed Project has been designed to avoid heritage assets. However, where avoidance is not feasible impacts will be mitigated through a strategy developed with, and approved by, stakeholders. Application Document 7.5.4.1 Suffolk Outline Onshore Overarching Written Scheme of Investigation is submitted with the application.</p>
<p>SCLP11.4: Listed Buildings</p> <p><i>The policy deals with both physical impacts and changes to the setting of listed buildings. Specifically the policy states that, Proposals to alter, extend or change the use of a listed building (including curtilage listed structures) or development affecting its setting will be supported where they: a) Demonstrate a clear understanding of the significance of the building and its setting alongside an assessment of the potential impact of the proposal on that significance; b) Do not harm the character of the building or any architectural, artistic, historic, or archaeological features that contribute</i></p>	<p>The Proposed Project would not result in physical impacts on listed buildings.</p> <p>Potential impacts on the setting of listed buildings are assessed in Section 3.9 of this chapter, while a Heritage Statement is included in Appendix E of Application Document 7.1 Planning Statement.</p>

Suffolk Coastal Local Plan - Policy	Where this is covered in the ES
<p><i>towards its special interest; c) Are of an appropriate design, scale, form, height, massing and position which complement the existing building; d) Use high quality materials and methods of construction which complement the character of the building; e) Retain the historic internal layout of the building; and f) Remove existing features that detract from the building to enhance or better reveal its significance.</i></p>	
<p>SCLP11.5: Conservation Areas</p> <p>Policy deals with development within, or which has the potential to affect the setting of, Conservation Areas. The policy states:</p> <p><i>“Proposals for development within a Conservation Area should: a) Demonstrate a clear understanding of the significance of the conservation area alongside an assessment of the potential impact of the proposal on that significance; b) Preserve or enhance the character or appearance of the conservation area; c) Be of an appropriate design, scale, form, height, massing and position; d) Retain features important to settlement form and pattern such as open spaces, plot divisions, position of dwellings, hierarchy of routes, hierarchy of buildings, and their uses, boundary treatments and gardens; and e) Use high quality materials and methods of construction which complement the character of the area.</i></p> <p>And,</p> <p><i>“Proposals for development which affect the setting of a Conservation Area should be considered against criteria a), c) and e) above.”</i></p>	<p>The Proposed Project has the potential to result in impacts on the setting of Saxmundham Conservation Area. As a result, the potential impacts have been assessed in Section 3.9 of this chapter.</p>
<p>SCLP11.6: Non-Designated Heritage Assets</p> <p>The policy covers the reuse of removal of non-designated heritage assets. The policy notes that consent to demolish/remove a feature will be based on elements such as structural</p>	<p>No non-designated built heritage assets would be removed/demolished.</p> <p>Where feasible, the Proposed Project has been designed to avoid heritage assets. However, where avoidance is not feasible impacts will be mitigated through a strategy developed with, and approved by, stakeholders. Application Document 7.5.4.1</p>

Suffolk Coastal Local Plan - Policy	Where this is covered in the ES
<p>integrity and economic viability of repair, as well as the heritage value/significance.</p> <p><i>“Proposals for the re-use of Non-Designated Heritage Assets which are buildings or structures will be supported if compatible with the elements of the fabric and setting of the building or structure which contribute to its significance. Applications, including those for a change of use, which result in harm to the significance of a Non-Designated Heritage Asset will be judged based on the balance of the scale of any harm or loss, and the significance of the heritage asset. In considering proposals which involve the loss of a non-designated heritage asset, consideration will be given to: a) Whether the asset is structurally unsound and beyond technically feasible and economically viable repair (for reasons other than deliberate damage or neglect); or b) Which measures to sustain the existing use, or find an alternative use/user, have been fully investigated.”</i></p>	<p>Suffolk Outline Onshore Overarching Written Scheme of Investigation is submitted with the application.</p>
<p>SCLP11.7: Archaeology</p> <p>The policy states that, <i>“An archaeological assessment proportionate to the potential and significance of remains must be included with any planning application affecting areas of known or suspected archaeological importance to ensure that provision is made for the preservation of important archaeological remains. Where proposals affect archaeological sites, preference will be given to preservation in situ unless it can be shown that recording of remains, assessment, analysis report and/or deposition of the archive is more appropriate. Archaeological conditions or planning obligations will be imposed on consents as appropriate. Measures to disseminate and promote information about archaeological</i></p>	<p>Noted. A proportionate assessment of impact to the heritage significance of assets is included in Section 3.9 of this chapter, with a Heritage Statement and assessment of harm is presented in Appendix E of Application Document 7.1 Planning Statement.</p> <p>Where feasible, the Proposed Project has been designed to avoid heritage assets. However, where avoidance is not feasible impacts will be mitigated through a strategy developed with, and approved by, stakeholders. Application Document 7.5.4.1 Suffolk Outline Onshore Overarching Written Scheme of Investigation is submitted with the application.</p>

Suffolk Coastal Local Plan - Policy	Where this is covered in the ES
assets to the public will be supported.”.	
<p>SCLP11.8: Parks and Gardens of Historic or Landscape Interest</p> <p>The policy relates to the potential for impacts on Registered Parks and Gardens identified as Designated Assets within NPPF, as well as parks and gardens recorded by East Suffolk Council as being of significance. The policy lists designated and non-designated historic parklands within the plan area that are identified as significant in heritage terms. None of the parks listed in the policy are located within the Study Area.</p>	<p>There are no Registered Parks and Gardens within the Study Area used to inform the baseline, or within the wider Study Area used to assess the potential for impacts on setting. While not a designated heritage asset, and not listed in Policy SCLP11.8 Parks and Gardens of Historic or Landscape Interest as a non-designated asset of heritage significance, the former parkland associated with Hurts Hall has been assessed in Section 3.9 of this chapter. A Heritage Statement and assessment of harm is also presented in Appendix E of Application Document 7.1 Planning Statement.</p>

3.3 Scoping Opinion and Consultation

Scoping

- 3.3.1 A Scoping Report for the Proposed Project was issued to the Planning Inspectorate (PINS) on 24 October 2022 (**Application Document 6.14 Environmental Scoping Report 2022**) and a Scoping Opinion was received from the SoS on 1 December 2022 (**Application Document 6.15 Scoping Opinion 2022**). Table 3.5 sets out the comments raised in the Scoping Opinion and how these have been addressed in this ES. The Scoping Opinion takes account of responses from prescribed consultees as appropriate. **Application Document 6.3.1.6.A Appendix 1.6.A Response to Scoping Opinion** provides responses to the comments made by the prescribed consultees at scoping stage and how each comment has been considered.

Table 3.5 Comments raised in the Scoping Opinion

ID	Inspectorate's comments	Response
3.3.1	<p><i>[Physical impacts on non-designated assets (maintenance and decommissioning)]</i></p> <p>The ES should clearly state the approach to non-designated assets encountered during construction, such as whether preservation in-situ is proposed, and confirm where non-designated assets have been preserved in situ. The ES should consider the potential for effects on non-designated assets during the maintenance</p>	<p>Noted. Potential impacts on non-designated assets, including previously unrecorded assets that might be identified during construction, have been examined in Section 3.9 of this chapter, with additional mitigation measures detailed in Section 3.10. Potential impacts to heritage assets during the maintenance and decommissioning stages are also considered in this chapter.</p>

ID	Inspectorate's comments	Response
	and decommissioning stage, where likely significant effects could occur.	
3.3.2	<p><i>[Temporary impacts on the setting of heritage assets resulting from plant/machinery (maintenance and decommissioning)]</i></p> <p>The Inspectorate agrees that settings effects on heritage assets arising from the presence of plant and machinery during the maintenance phase can be scoped out of the assessment on the basis of the likely small scale and temporary nature of likely maintenance and decommissioning activities.</p>	<p>There would be no significant effects to heritage assets arising from temporary changes to their setting during the maintenance and decommissioning phase. A rationale for the scoping out of heritage assets from construction phases is provided in Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report. Detailed information relating to the Proposed Project is set out in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.</p>
3.3.3	<p><i>[Temporary impacts on the setting of heritage assets from construction compounds introducing light and noise pollution (decommissioning)]</i></p> <p>The Inspectorate agrees that impacts on the setting of heritage assets from construction compounds introducing light and noise pollution during the decommissioning stage are likely to be small scale and of a temporary nature, and thus this matter can be scoped out of the assessment.</p>	<p>There would be no significant effects to heritage assets arising from temporary changes to their setting during decommissioning due to the small scale and temporary nature of decommissioning work. A rationale for the scoping out of heritage assets is provided in Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report.</p>
3.3.4	<p><i>[Study area]</i></p> <p>Noting that the proposed study area is to be refined during the assessment process, the study area should be determined using the ZOI from the Proposed Development, to ensure that all heritage assets likely to be significantly affected by the Proposed Development have been included in the assessment. This should include consideration of those assets that contribute to setting.</p>	<p>The Study Area was agreed with Stakeholders at Scoping and PEIR and was informed by the Zone of Influence (ZOI) for the Proposed Project.</p> <p>Potential impacts on the setting of heritage assets have been examined in Section 3.9 of this chapter. Assets were identified through consultation with stakeholders ESC and HE.</p>
3.3.5	<p><i>[Heritage receptors]</i></p> <p>The Applicant's attention is directed to the comments of East Suffolk Council and Friston Parish Council at Appendix 2 to this Opinion, which identify additional heritage assets to be considered in the setting assessment. The Applicant should seek to agree the heritage receptors to be included within the heritage assessment with</p>	<p>Noted. The assets identified by Friston Parish Council and East Suffolk Council have been considered and have been included in this chapter where there is potential for significant effects to arise. Potential impacts arising from change to the setting of heritage assets have also been assessed in Section 3.9 of this chapter. All assets included in this</p>

ID	Inspectorate's comments	Response
	relevant consultation bodies and include an assessment on these receptors, where significant effects are likely to occur.	assessment were identified and agreed through consultation with stakeholders ESC and HE.
3.3.6	<p data-bbox="225 331 719 409"><i>[Sources of construction impacts – groundwater]</i></p> <p data-bbox="225 416 847 745">The ES should consider and assess effects to archaeological receptors resulting from impacts to groundwater levels from the Proposed Development, where likely significant effects could occur. The ES should include suitable cross-references between the Cultural Heritage and the Geology and Hydrogeology aspect chapter.</p>	<p data-bbox="874 331 1465 439">Potential impacts arising from changes to groundwater levels are assessed in Section 3.9 of this chapter.</p> <p data-bbox="874 450 1465 931">Additional survey work, informed by the Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report has been carried out for the Proposed Project. The results of the additional survey work are included as appendices to the ES and are listed in paragraph 3.1.5 of this chapter. An outline Written Scheme of Investigation for additional mitigation is provided as Application Document 7.5.4.1 Suffolk Outline Onshore Overarching Written Scheme of Investigation.</p>
3.3.7	<p data-bbox="225 947 759 992"><i>[Proposed assessment methodology]</i></p> <p data-bbox="225 999 847 1435">The Inspectorate notes that the need for any additional survey work will be determined following the desk-based assessment (DBA). Investigative works should be accompanied by a Written Scheme of Investigation (WSI), it is recommended that a draft WSI be provided with the ES. The Applicant is advised to seek to agree the scope of the site investigations and WSI with relevant consultation bodies, including the Local Authority and Historic England.</p>	<p data-bbox="874 947 1465 1055">All evaluation works were undertaken in accordance with specific WSIs approved by SCC.</p> <p data-bbox="874 1066 1465 1619">Additional survey work, informed by the Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report has been carried out for the Proposed Project. The results of the additional survey work are included as appendices to the ES and are listed in paragraph 3.1.5 of this chapter. An outline Written Scheme of Investigation for additional mitigation, agreed with the Archaeological Advisor for SCC and Historic England, is provided as Application Document 7.5.4.1 Suffolk Outline Onshore Overarching Written Scheme of Investigation.</p>
3.3.8	<p data-bbox="225 1635 759 1713"><i>[Assessment methodology – heritage value]</i></p> <p data-bbox="225 1720 847 1975">Table 2.4.9 determining significance of effect includes for a heritage value of 'Very High'; however, Table 2.4.7 used to define heritage value only includes up to a value of 'high'. The ES should provide a clear explanation of the assessment methodology applied.</p>	<p data-bbox="874 1635 1449 1749">Noted. Methodology tables updated and in accordance with those agreed at Scoping.</p>

Statutory Consultation

- 3.3.2 Statutory Consultation for the Proposed Project took place between 24 October and 18 December 2023. A further Targeted Consultation exercise on the main changes to the Proposed Project introduced after the 2023 statutory consultation, was undertaken between 8 July and 11 August 2024. In addition, a project update and a local engagement exercise took place between 22 November 2024 and 12 January 2025, focusing on design amendments made following Targeted Consultation. A summary of relevant feedback received during statutory consultation relating to cultural heritage is provided below. Further details on how consultation responses have informed the assessment can be found in **Application Document 5.1 Consultation Report** and **Application Document 5.1.9 Appendix H Summary 2023 Response**.
- 3.3.3 Key feedback raised is detailed in Table 3.6.

Table 3.6 Key topics raised at the statutory consultation and applicant responses

Stakeholder	Key topics raised by stakeholder	Summary of response from National Grid
Historic England	Acknowledge that archaeological survey and investigations (including evaluation trenching) are being undertaken, and that result will be provided in the ES.	The results of all surveys undertaken to date have been synthesised in the baseline Application Document 6.2.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report , and have informed the impact assessment in Section 3.9 of this chapter. The results of the investigations are included as technical appendices to this ES, as listed in Section 3.1 of this chapter.
Historic England	Note that the Order Limits have been reduced in a number of areas. While this may reduce the potential for physical impacts on archaeological remains, it may also remove the opportunity to mitigate impacts through avoiding assets as the reduced Order Limits will allow less flexibility.	The results of the cultural heritage survey have continued to inform design with micro-siting of the Order Limits and Limits of Deviation altered where feasible. Where avoidance has not been feasible, a mitigation strategy has been developed as detailed in Application Document 7.5.4.1 Suffolk Outline Onshore Overarching Written Scheme of Investigation .
Historic England	The increased height of the bridge over the River Fromus has the potential to result in a new significant effect and as such visualisations will be required from specific heritage viewpoints as part of the assessment.	Stakeholders including ESC and Historic England have been consulted regarding the design of the permanent access and the design of the bridge over the River Fromus. The design of the River Fromus bridge, in relation to its sensitive landscape and historic

Stakeholder	Key topics raised by stakeholder	Summary of response from National Grid
		setting is reflected in Application Document 7.11.1 Design Approach Document - Suffolk and measure LV14 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) . An assessment of impacts resulting from the construction and operation of the permanent access and bridge is provided in Section 3.9. A visualisation from the viewpoint agreed with Historic England, which illustrates the bridge over the River Fromus, is presented in Application Document 6.4.2.3.8 Representative Viewpoint Visualisations .
Historic England	It is recognised that a number of areas have been added to the Order Limits for ecological mitigation. And it recommended that these areas are subject to suitable investigation such as geophysical survey and evaluation trenching so impacts can be assessed and mitigation agreed.	A number of large areas have now been removed from the Order Limits. Potential impacts have been assessed for all areas of the Order Limits, with archaeological field surveys, including geophysical survey and trial trench evaluation, undertaken of the additional areas where land access could be agreed, and where the Proposed Project would result in physical impacts.
Suffolk County Council	The additional field centred on TM 44028 58566 represents a significant addition to the Order Limits and should be subject to suitable investigation such as geophysical survey and evaluation trenching so impacts can be assessed and mitigation agreed.	This field has now been removed from the Order Limits.
Suffolk County Council	Where the Order Limits overlap with other schemes (notably Lion Link and East Anglia 1 North and 2), the applicants should negotiate responsibility for archaeological evaluation and mitigation.	National Grid has liaised with other projects in the area and where possible coordinated archaeological evaluation by for example by sharing data and information such as trenching plans so that a holistic approach could be developed.
Suffolk County Council	The Council notes that based on current baseline understanding, it is assumed that the heritage significance of previously unrecorded	The significance of assets has been based on trenching data where available. In areas where trenching has not been completed by the time

Stakeholder	Key topics raised by stakeholder	Summary of response from National Grid
	archaeological remains within the Order Limits are unlikely to be of national importance and significance. The Council recognises that this assumption cannot be confirmed until trial trenching has been carried out.	of the assessment, the significance of assets has been based on professional judgement and informed by elements such as similar features recorded in the surrounding landscape. The significance of assets is discussed in Section 3.9 of this chapter as well as Application Document 6.2.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report .
Suffolk County Council	It cannot be assumed that topsoil stripping is not destructive to existing remains. Understating of the nature and preservation of archaeological remains including depth and cover is essential.	It is not assumed that topsoil stripping is not destructive. Depth of topsoil and previous disturbance from agricultural activities has, along with the results of evaluation trenching, been used to inform whether preservation in situ is a suitable form of mitigation. This is discussed further in Section 3.10 of this chapter.
East Suffolk Council	The proposed bridge over the Fromus should be designed to be visually recessive and should not be a pastiche of any historic bridge, with a simple contemporary design most appropriate.	Stakeholders including ESC and Historic England have been consulted regarding the design of the permanent access and the design of the bridge over the River Fromus. An assessment of impacts resulting from the construction and operation of the permanent access and bridge is provided in Section 3.9. Visualisations showing the visual impact of the bridge from agreed landscape and heritage viewpoints are provided in Application Document 6.4.2.1.10 Representative Viewpoint Visualisations (Landscape and Visual) and Application Document 6.4.2.3.8 Representative Viewpoint Visualisations (Cultural Heritage).
East Suffolk Council	The visual impact of the proposed permanent access and Fromus bridge should be illustrated through photomontages from Hurts Hall, and towards Hurts Hall from the west.	Visualisations from locations agreed through consultation with ESC, including from and towards Hurts Hall and its associated parkland, are provided in Application Document 6.4.2.3.8 Representative Viewpoint Visualisations (Cultural Heritage)

Stakeholder	Key topics raised by stakeholder	Summary of response from National Grid
		and Application Document 6.4.2.1.10 Representative Viewpoint Visualisations (Landscape and Visual).
East Suffolk Council	An important element of the views around Hurts Hall from the B1121 is stated to be the panorama of open farmland in the foreground with Hurts Hall in middle distance. Policy 'SAX12: Gateways, Views, and the Landscape Setting of Saxmundham' of the Saxmundham Neighbourhood Plan seeks to protect the scenic value of the landscape and countryside in the parish outside the defined settlement boundary of the town from development which may adversely affect this character. It goes on to say development which would have an unacceptable adverse impact on the landscape or character of the view concerned will not be supported, including in views from the B1121 looking across to Hurts Hall. The proposals for the converter station site and associated Fromus crossing have the potential to significantly affect these views, contrary to the aims of the adopted Saxmundham Neighbourhood Plan.	The assessment of potential impacts on the setting of Hurts Hall and Saxmundham is provided in Section 3.9. Heritage visualisations produced as part of this assessment which include views from and towards Hurts Hall are provided in Application Document 6.4.2.3.8 Representative Viewpoint Visualisations with further views from landscape receptors, including views from the B1121 to Hurts Hall, provided in Application Document 6.4.2.1.10 Representative Viewpoint Visualisations (specifically, Application Document 6.4.2.1.10-B Representative Viewpoint 2).
East Suffolk Council	The assessment should full consider impacts on the setting of Hurts Hall, and include the potential impacts resulting from landscape mitigation such as tree planting. This should include views from the western and southern aspects of the hall, as well as views of the hall from the west.	The assessment of potential impacts on the setting of Hurts Hall and Saxmundham is provided in Section 3.9 of this chapter. Visualisations produced as part of the assessment are provided in Application Document 6.4.2.3.8 Representative Viewpoint Visualisations (Cultural Heritage) and Application Document 6.4.2.1.10 Representative Viewpoint Visualisations (Landscape and Visual) .
Suffolk Preservation Society	The loss of the woodland associated with the larger bridge crossing the River Fromus would open up views towards the converter station site and increase the focus towards it.	The assessment of potential impacts on the setting of Hurts Hall, St John the Baptists Church, Saxmundham Conservation Area, and Wood Farm,

Stakeholder	Key topics raised by stakeholder	Summary of response from National Grid
	Furthermore, it will bring construction activity and industrialising large-scale development closer to the setting of the Grade II listed Hall and its parkland, the Grade II* listed St John the Baptist's church, and the Grade II listed Wood Farmhouse, and it will increase the scale of change within the view in the context of these nationally designated heritage assets. It will also have impacts upon the wider setting of the Saxmundham Conservation Area as well as receptors using the PROW network and road users of the B1121.	is provided in Section 3.9 of this chapter. Visualisations produced as part of the assessment are provided in Application Document 6.4.2.3.8 Representative Viewpoint Visualisations (Cultural Heritage) and Application Document 6.4.2.1.10 Representative Viewpoint Visualisations (Landscape and Visual) . Specifically, Application Document 6.4.2.1.10-B Representative Viewpoint 2 comprises a visualisation from the B1121.
Saxmundham Town Council	The visual impact of the proposed permanent access and Fromus bridge have the potential to result in a significant impact on Hurts Hall and the landscape to the south of Saxmundham/the approach to Saxmundham from the south.	The assessment of potential impacts on the setting of Hurts Hall and Saxmundham is provided in Section 3.9 of this chapter. Visualisations produced as part of the assessment are provided in Application Document 6.4.2.3.8 Representative Viewpoint Visualisations (Cultural Heritage) and Application Document 6.4.2.1.10 Representative Viewpoint Visualisations (Landscape and Visual) .

Further Engagement

- 3.3.4 A process of ongoing engagement has been undertaken with the Archaeological Advisor for SCC as well as the Inspector of Ancient Monuments at Historic England, to ensure, as far as practicable, that heritage issues are identified and potential impacts to heritage assets are included in the assessment. This has included thematic group meetings as well as discussion relating to geophysical survey, archaeological evaluation trenching, a geoarchaeological assessment, and mitigation.
- 3.3.5 Table 3.7 below provides a summary of engagement with relevant stakeholders undertaken to inform the assessment.

Table 3.7 Summary of further engagement with relevant stakeholders

Stakeholder	Date	Subject Discussed	Where this is covered in the ES
SCC Archaeological Advisor	July 2022	Discussion via email regarding the scope of archaeological monitoring required for proposed Ground Investigations (GI) works required for input into the design of the Suffolk Onshore Scheme. Discussions also included a review of GI locations with some works micro-siting to avoid heritage assets.	Data collected as part of the archaeological monitoring was captured in the GI factual report (Application Document 6.3.2.5.D Appendix 2.5.D Ground Investigation Report – Suffolk). Results also considered in the Application Document 6.2.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report .
SCC Archaeological Advisor	May 2023	Draft WSI supplied by the archaeological contractor undertaking the monitoring of the GI works. WSI approved by Archaeological Advisor for SCC.	Data collected as part of the archaeological monitoring is summarised in Application Document 6.2.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report .
ESC Conservation Officer, and Historic England	November 2023 to February 2024	Discussions relating to the location of photomontages required for the assessment of impacts on setting. Agreed on three photomontages from Hurts Hall, Wood Farm, and Hill Farm.	Visualisations relevant to these assets are produced as part of the assessment and provided in Application Document 6.4.2.3.8 Representative Viewpoint Visualisations .
SCC Archaeological Advisor	September 2023	Geophysical survey extent agreed and WSI submitted for approval. WSI approved.	Results of the geophysical survey are provided in Application Document 6.3.2.3.D Appendix 2.3.D Geophysical Survey Report and results discussed in Application Document 6.2.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report and in Section 3.5 and 3.7 of this chapter.
SCC Archaeological Advisor	January to March 2024	Location of archaeological evaluation trenches agreed.	Results of evaluation trenching are provided in Application Document 6.3.2.3.F Appendix 2.3.F Draft Archaeological

Stakeholder	Date	Subject Discussed	Where this is covered in the ES
			Evaluation Trenching Report and discussed in Application Document 6.2.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report and in Section 3.5 and 3.7 of this chapter.
SCC Archaeological Advisor	June to October 2024	WSI for Phase 1 of evaluation trenching agreed and trenching commenced. SCC Archaeological Advisor undertook monitoring visits at least once a week, with all trenches examined in person.	Results of evaluation trenching are provided in Application Document 6.3.2.3.F Appendix 2.3.F Draft Archaeological Evaluation Trenching Report and discussed in Application Document 6.2.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report and in Section 3.5 and 3.7 of this chapter.
SCC Archaeological Advisor and HER Officer	September 2024	Revised Historic Environment Record (HER) data search undertaken.	HER data has been used to inform the baseline provided in Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report and assess impacts on previously recorded assets, as reported in this chapter.

Summary of Scope of Assessment

- 3.3.6 This section details what aspects have been scoped in and scoped out of the assessment through the scoping process and consultation with stakeholders.

Aspects scoped into the assessment

- 3.3.7 The scope of this assessment covers potential permanent impacts to heritage assets during the construction stage of the Suffolk Onshore Scheme. The assessment also considers potential longer term and permanent effects, arising from change to the setting of heritage assets from the physical presence of the permanent operational infrastructure.
- 3.3.8 Potential effects to heritage assets arising from decommissioning activities are also considered in this assessment.

Aspects scoped out of the assessment

- 3.3.9 Temporary impacts on the setting of heritage assets during the construction phase of the Proposed Project have been scoped out due to the limited potential for significant effects, and the temporary nature of the potential impacts.

3.4 Approach and Methodology

- 3.4.1 **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology** sets out the overarching approach which has been used in developing the ES. This section describes the technical methods used to determine the baseline conditions, sensitivity of the receptors and magnitude of effects and sets out the significance criteria that have been used for the cultural heritage assessment.

Guidance Specific to the Cultural Heritage Assessment

- 3.4.2 Guidance that has been considered comprises:
- Historic England. Good Practice Advice (GPA) Note 2: Managing Significance in Decision-taking (Historic England, 2017);
 - Historic England. GPA3. The Setting of Heritage Assets (Historic England, 2017);
 - Historic England. Advice Note 12 Statements of Heritage Significance (Historic England , 2019);
 - Standards and Guidance for Historic Environment Desk-based Assessments (Chartered Institute for Archaeologists, 2020); and
 - Principles of Cultural Heritage Impact Assessment in the UK (IEMA, IHBC, and ClfA, 2021).

Baseline Data Gathering and Forecasting Methods

- 3.4.3 **Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report** has been undertaken in accordance with guidance published by the Chartered Institute for Archaeologists, specifically the Standard and Guidance for Historic Environment Desk-based Assessment (Chartered Institute for Archaeologists , 2020) and guidance published by Historic England (Historic England , 2017) (Historic England , 2019).
- 3.4.4 **Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report** identifies all known designated and non-designated heritage assets within the Order Limits and Study Area. The report describes the cultural heritage baseline conditions, describes heritage assets and the contribution their setting makes to their heritage value, and also articulates the setting of heritage assets through supplementary photographs where kinetic views are relevant to their experience. The report also assesses the archaeological potential of the land within the Order Limits and identifies the key heritage considerations.

Data sources

- 3.4.5 The following sources of information have been used to establish the cultural heritage baseline conditions:
- A programme of archaeological geophysical survey within the Order Limits undertaken as part of the assessment. The results of the survey are summarised in Section 4.7 of **Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report** and have been used to inform this chapter. The geophysical survey report is submitted with this ES as **Application Document 6.3.2.3.D Appendix 2.3.D Geophysical Survey Report**.

- A review of aerial photographs and LiDAR data has also been undertaken for the Study Area. The results are summarised in **Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report** with the full report presented as **Application Document 6.3.2.3.E Appendix 2.3.E Aerial Photography and LiDAR Report**.
- A programme of archaeological evaluation trenching has been undertaken, with the works focused on the main areas of disturbance (i.e. the Saxmundham Converter Station and Friston Substation, as well as the cable corridor and the main construction compounds). The results of the survey are summarised in **Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report** and have been used to inform this chapter. The draft evaluation trenching report is submitted with this ES as **Application Document 6.3.2.3.F Appendix 2.3.F Draft Archaeological Evaluation Trenching Report**.
- The potential for deposits containing palaeoenvironmental data has been informed by an initial review of the results of the Ground Investigation (GI) works undertaken as part of the engineering works.
- SCC HER data [data acquired 2022, with a revised search undertaken in September 2024] for information relating to non-designated heritage assets, historic landscape and previous fieldwork events.
- Published and unpublished literature, referenced in **Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report**, including a detailed review of reports for previous fieldwork carried out within the proximity to the Order Limits.
- Documentary, cartographic and other resources available online and as deposited within the local archives.
- Local authority websites for information about conservation areas and buildings on the local list.
- National Heritage List for England for data relating to designated heritage assets [data downloaded September 2024].
- Various online resources including the British Geological Survey (BGS) Geology of Britain Viewer (British Geological Survey, 2024).
- Heritage Gateway for former National Monuments Record and excavation index data (Historic England, 2024).
- National Library of Scotland for historic Ordnance Survey mapping and other historic cartographic sources (National Library of Scotland, 2024).
- Archaeology Data Service for information on previous cultural heritage assessments and fieldwork surveys (Archaeological Data Service, 2024).

Site walkover

- 3.4.6 The cultural heritage baseline has been further informed by site walkover surveys, carried out initially in 2021, with further site visits carried out 17 to 19 August 2022, 20 and 21 June 2023, and 29 and 30 July 2024.
- 3.4.7 The site walkovers comprised visual inspections of fields within the Order Limits to identify known and previously unknown heritage assets. The site visits assessed the settings of heritage assets within the Order Limits and the Study Area and also

assessed the importance of views in the appreciation and experience of heritage assets and how these changed as the viewer moved through the landscape. The results of the walkover surveys are detailed in **Application Document 6.2.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report**.

Archaeological field surveys

- 3.4.8 A programme of archaeological geophysical survey has been carried out for the Proposed Project. Where the results have identified potential archaeological sites within the Order Limits, these have been identified as potential buried archaeological remains and included in the assessment of potential impact in Section 3.9 of this chapter. The geophysical survey report is submitted as **Application Document 6.3.2.3.D Appendix 2.3.D Geophysical Survey Report**.
- 3.4.9 Archaeological trial trench evaluation has been carried out for the Proposed Project and potential impacts to buried archaeological features confirmed as being present within the Order Limits by the trial trenching are assessed in Section 3.9 of this chapter. The trial trenching report is submitted as **Application Document 6.3.2.3.F Appendix 2.3.F Archaeological Evaluation Trenching Report**.

Assessment Criteria

- 3.4.10 This section presents the methodology used for determining the significance of effect to heritage assets as a result of the construction, operation, and decommissioning of the Suffolk Onshore Scheme.
- 3.4.11 Determining the heritage significance of a heritage asset uses a different assessment process to that used to ascribe a value score. Heritage significance is guided by an asset's designated status but, in line with Annex 2: Glossary of the NPPF, is derived primarily from an asset's archaeological, architectural, artistic and historic interest along with elements of its setting, where applicable. Determining heritage significance therefore follows the NPPF and guidance published by Historic England (Historic England, 2019) (Historic England, 2017).
- 3.4.12 The significance of heritage assets and how this derives from their interest and elements of their setting, is described in Section 3.9. The method and criteria used in Table 3.8 to ascribe a value score to a heritage asset is based upon the degree to which the heritage significance of the asset is protected through legislation and planning policy, and follows guidance for cultural heritage impact assessment (IEMA, IHBC, and ClfA, 2021). In addition, when assigning a value score to a heritage asset, a professional judgement is made regarding the merits of each asset.
- 3.4.13 The principles of impact assessment methodology rest upon using professional judgement and best practice to independently evaluate the value of heritage assets and the magnitude of impact upon that value. By combining the value of the heritage asset with the predicted magnitude of impact, the classification and significance of the effect arising from the Suffolk Onshore Scheme can be determined. The effect can be beneficial or adverse.
- 3.4.14 As stated in Section 3.10 of this chapter, the cultural heritage impact assessment considers landscape planting proposals, as detailed in **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk**, as additional mitigation. Adopting the principles of the 'Rochdale Envelope', this approach recognises that at year 1 operation, the growth of advanced planting would not be of a sufficient height to have a material change in views and, where it is intended to do so, would not

sufficiently screen the built components of the Suffolk Onshore Scheme from heritage assets. As such, to identify the worst-case scenario for impacts to heritage assets through setting change, Section 3.9 assesses potential impacts at year 1 operation of the Suffolk Onshore Scheme. Year 15 operation, when the landscape planting has achieved its full height, is regarded as additional mitigation and is taken into account when assessing the residual effects of the Suffolk Onshore Scheme.

Determining the value of heritage assets

- 3.4.15 Each identified heritage asset can be assigned a value in accordance with the criteria set out in Table 3.8. Professional judgement and the results of consultation and engagement with statutory consultees and stakeholders also contribute to the assessment of value. Regional variations, contribution to regional research agenda and individual qualities of heritage assets are also taken into account where applicable.
- 3.4.16 Whilst it is recognised that listed buildings are designated due to an architectural or historic interest considered to be of national importance, for the purpose of this assessment a distinction in value is made in Table 3.8 between Grade I and Grade II* listed buildings and Grade II listed buildings. This reflects the separation of the grades in paragraph 213 of the NPPF which makes a distinction between Grade II listed buildings and registered parks and gardens, and assets which it considers to be of ‘the highest significance’, notably scheduled monuments, Grade I and II* listed buildings and Grade I and II* registered parks and gardens.

Table 3.8 Criteria for determining the value of a heritage asset

Asset Value	Description
High	<p>World Heritage Sites;</p> <p>Scheduled Monuments;</p> <p>Grade I and II* listed buildings;</p> <p>Registered battlefields;</p> <p>Grade I and II* registered parks and gardens;</p> <p>Conservation areas of demonstrable high value (i.e., high number of Grade I and II* buildings; diverse and high-quality buildings);</p> <p>Non-designated heritage assets (archaeological sites, historic buildings, monuments, parks, gardens or landscapes) that can be shown to have demonstrable national or international importance; and</p> <p>Well preserved historic landscape character areas, exhibiting considerable coherence, time-depth or other critical factor(s).</p>
Medium	<p>Grade II listed buildings;</p> <p>Grade II registered parks and gardens;</p> <p>Conservation areas (majority Grade II buildings displaying, predominantly, local characteristics and styles);</p> <p>Non-designated heritage assets (archaeological sites, historic buildings, monuments, park, gardens or landscapes) that can be shown to have demonstrable regional importance;</p>

Asset Value	Description
	Averagely preserved historic landscape character areas, exhibiting reasonable coherence, time-depth or other critical factor(s); and Historic townscape with historic integrity in that the assets that constitute their make-up are clearly legible.
Low	Locally listed buildings; Non-designated heritage assets (archaeological sites, historic buildings, monuments, park, gardens or landscapes) that can be shown to have demonstrable local importance; Assets whose values are compromised by poor preservation or survival of contextual associations to justify inclusion into a higher grade; and Historic landscape character areas whose value is limited by poor preservation and/or poor survival of contextual associations.
Negligible	Assets identified on national or regional databases, but which have no archaeological, architectural, artistic or historic value; Assets whose values are compromised by poor preservation or survival of contextual associations to justify inclusion into a higher grade; and Landscape with no or little significant historical merit.

Magnitude of cultural heritage impacts

- 3.4.17 The method for determining the magnitude of impact to heritage assets is set out in Table 3.9.
- 3.4.18 Impacts may arise during construction, operation, or decommissioning and can be temporary, reversible, or permanent. Impacts can occur to the physical fabric of a heritage asset or result in changes that affect its setting. The magnitude of impact arising from the Proposed Project takes into account mitigation measures which have been embedded as part of the design development process. In line with guidance set out in Principles of Cultural Heritage Impact Assessment in the UK (IEMA, IHBC, and ClfA, 2021) a scale of impact from large to negligible has been used to articulate the magnitude of change and impact to heritage significance.

Table 3.9 Criteria for determining the magnitude of impact

Magnitude of impact	Description of impact
Large	Changes such that the value of the asset is totally altered or destroyed. Comprehensive change to, or total loss of, elements of setting that would result in harm to the asset and our ability to understand and appreciate its value.
Medium	Change such that the value of the asset is significantly altered or modified.

Magnitude of impact	Description of impact
	Changes such that the setting of the asset is noticeably different, affecting significance and resulting in changes in our ability to understand and appreciate the value of the asset.
Small	Changes such that the value of the asset is slightly affected. Changes to the setting that have a slight impact on its value resulting in changes in our ability to understand and appreciate the value of the asset.
Negligible	Changes to the asset that hardly affect its value. Changes to the setting of an asset that have little effect on its value and no real change in our ability to understand and appreciate the value of the asset.

Classification and significance of effects

- 3.4.19 An assessment to classify the effect, having taken into consideration any embedded mitigation, is determined using the matrix at Table 3.10. In line guidance set out in Principles of Cultural Heritage Impact Assessment in the UK (IEMA, IHBC, and ClfA, 2021) this uses a graded scale of effects. The significance of effect table includes a 'no impact' category to record where the Proposed Project would result in no impact and no effect to a heritage asset.

Table 3.10 Criteria for determining the significance of effect

Value of heritage asset	Magnitude of Impact				
	Large	Medium	Small	Negligible	No Impact
High	Major	Major	Moderate	Minor	No effect
Medium	Major	Moderate	Minor	Negligible	No effect
Low	Moderate	Minor	Negligible	Negligible	No effect
Negligible	Minor	Negligible	Negligible	Negligible	No effect

- 3.4.20 The effect is determined by cross-referencing the value of the heritage asset with the magnitude of impact. As set out in **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology**, major and moderate effects are considered to be significant. If significant effects are assessed and, if appropriate, additional mitigation is proposed, as set out in Section 3.10 of this chapter. Additional mitigation does not reduce the magnitude of the impact, particularly where the impact relates to the physical loss of a heritage asset, but it may reduce the effect if used to offset or compensate for an adverse effect. This scenario is a recognition that some additional mitigation measures, for example archaeological excavation and recording, whilst not being a benefit of development, is a better outcome when compared to the loss of a heritage asset without recording it.

- 3.4.21 Within the NPPF, Section 16 Paragraphs 212–216, and NPS EN-1 (Department for Energy Security and Net Zero, 2023), Section 5.8 Paragraphs 5.8.14–5.8.15, impacts affecting the value of heritage assets are considered in terms of harm, and there is a requirement to determine whether the level of harm amounts to ‘substantial harm’ or ‘less than substantial harm’.
- 3.4.22 There is no direct correlation between the significance of effect as reported in the ES and the level of harm caused to heritage significance. Harm to heritage significance more readily correlates with the magnitude of impact reported in the ES, as the level of harm to heritage significance is not dependent upon the degree of significance an asset holds. A high or medium magnitude of impact on a heritage asset would, more often, be the basis by which a decision maker would determine that the level of harm to the significance of the asset may be substantial. A low magnitude of impact is unlikely to meet the test of substantial harm and would, more often, be the basis by which a decision maker would determine that the level of harm to the heritage significance of the asset would be less than substantial. A very low magnitude of impact is also likely to amount to less than substantial harm. In all cases determining the level of harm to the significance of the asset arising from a development impact is one of professional judgement.
- 3.4.23 A Heritage Statement of Harm is presented in **Appendix E of Application Document 7.1 Planning Statement**.

Assumptions and Limitations

- 3.4.24 This assessment is based on the Suffolk Onshore Scheme design described in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** and shown on **Application Document 2.5.1 Work Plans – Suffolk** and **Application Document 2.14.1 General Arrangements Plans – Suffolk**.
- 3.4.25 The assessment has been undertaken adopting the principles of the ‘Rochdale Envelope’. This involves assessing the maximum (and where relevant, minimum) parameters for the Suffolk Onshore Scheme considered to be the likely worst-case scenario to determine significance of effect.
- 3.4.26 The assessment depends on the accuracy of data provided by third parties (e.g. HER data). It had been assumed that data provided by third parties is accurate.
- 3.4.27 Where data has been gathered or provided for the assessment, checks have been undertaken to ensure it has remained valid and up-to-date during the course of the work. Ongoing consultation with archaeological advisors at SCC and Historic England has also ensured that should any new findings from other works, undertaken during the course of the assessment, have been relevant to the Proposed Project, such findings could have been included and the assessment updated.
- 3.4.28 Archaeological evaluation trenching for most areas of the Suffolk Onshore Scheme that would be subject to significant surface works have been completed, with the areas not subject to trenching limited to temporary access tracks, new pylons/OHL works, and construction compounds which were not fixed. As detailed in **Application Document 7.5.4.1 Suffolk Outline Onshore Overarching Written Scheme of Investigation (Draft)**, these would be evaluated following determination of the DCO as part of a phased programme of archaeological works. The deferral of these elements of trenching has been agreed with the Archaeological Advisor for SCC and is not considered to form a meaningful limitation to the assessment.

- 3.4.29 The impacts and additional mitigation requirements in these areas can be adequately understood based on the results of a systematic programme of archaeological investigation carried out for the Proposed Project. The evaluation works that have been undertaken (**Application Document 6.3.2.3.F Appendix 2.3.F Draft Archaeological Evaluation Trenching Report**) largely confirmed the results of the geophysical survey (**Application Document 6.3.2.3.D Appendix 2.3.D Geophysical Survey Report**) and identified a number of areas of archaeological remains, which all principally relate to Iron Age and/or Romano-British settlement of the landscape. The evaluation information relating to these features, such as their spatial extent, would inform the Proposed Project's final design, and the design of a suite of further archaeological evaluation and mitigation works.
- 3.4.30 As stated in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**, the design life of the Proposed Project is anticipated to be at least 40 years. Furthermore, the conclusions of this chapter are not affected by the timing or phasing of construction or decommissioning, should they occur later or be carried out over a longer duration than that outlined in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. This is a result of the physical impacts to heritage assets resulting from the extent of construction works and not the timing/duration of construction works, while temporary impacts on the setting of assets during construction have been scoped out.
- 3.4.31 Parts of the Suffolk Onshore Scheme Boundary comprise grassland as part of additional ecological mitigation measures. There would be no physical impact to these areas as a result of the construction, operation or decommissioning of the Proposed Project where they do not correspond spatially with components of the Proposed Project, such as access tracks. As such, while included in the geophysical survey, these areas have not been included in the trial trench evaluation as there would be no impact arising from the Proposed Project and therefore no impact to buried heritage assets that may be present.

3.5 Basis of Assessment

- 3.5.1 This section sets out the assumptions that have been made in respect of design flexibility maintained within the Proposed Project and the consideration that has been given to alternative scenarios and the sensitivity of the assessment to changes in the construction commencement year.
- 3.5.2 Details of the available flexibility and assessment scenarios are presented in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** and **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology**.

Flexibility Assumptions

- 3.5.3 The environmental assessments have been undertaken based on the description of the Proposed Project provided in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. To take account of the flexibility allowed in the Proposed Project, consideration has been given to the potential for effects to be of greater or different significance should any of the permanent or temporary infrastructure elements be moved within the Limits of Deviation (LoD) or Order Limits.

3.5.4 The assumptions made regarding the use of flexibility for the main assessment are set out in Table 3.11 below.

Table 3.11 Flexibility assumptions

Element of flexibility	How it has been considered within the assessment
Lateral LoD HVDC/HVAC cables	The assumption that the cables have the potential to be laid anywhere within the lateral LoD has been considered for the assessment. In order to assess the reasonable worst-case scenario on land take required, the maximum design parameters have been selected to inform the assessment.
Lateral LoD Saxmundham Converter Station and Frsiton Substation	The assumption considered within this assessment is that Saxmundham Converter Station and Friston Substation would be constructed anywhere within the lateral LoD of the converter station and substation as shown in Application Document 2.5.1 Work Plans - Suffolk . In order to assess the reasonable worst-case scenario on land take required during the operation phase, the maximum design parameters have been selected to inform the assessment.
Vertical LoD Saxmundham Converter Station and Friston Substation	The assumption considered within the assessment is that there is a 26 m maximum vertical LoD for Saxmundham Converter Station and 18 m maximum vertical LoD for Friston Substation as explained in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project . In order to assess the reasonable worst-case scenario, the maximum design parameters have been selected to inform the assessment.
Lateral and Vertical LoD overhead line (where Friston Substation is built as part of the Proposed Project).	The assumption considered within this assessment is that the proposed overhead line works are to be undertaken anywhere within the lateral LoD as shown in Application Document 2.5.1 Work Plans – Suffolk . It has been assumed new pylons are to be built up to the maximum vertical LoD as described in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project .
Order Limits – temporary construction works	The assessment has considered the possibility of construction impacts happening anywhere within the Order Limits.

Consideration of Scenarios

3.5.5 The following scenarios with regards to Friston Substation have been considered in the assessment as explained in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**:

- Friston Substation is constructed under the development consent granted to Scottish Power Renewable (SPR), pursuant to 'The East Anglia ONE North (EA1N) Offshore Wind Farm Order 2022' and 'The East Anglia TWO (EA2) Offshore Wind Farm Order 2022'; or
 - Friston Substation is built as part of the Proposed Project.
- 3.5.6 Archaeological mitigation for the SPR EA1N and EA2 schemes commenced in autumn 2024. As a result, any physical impacts resulting from the construction of the Friston Substation and associated works, where they overlap with the Suffolk Onshore Scheme, would already have been mitigated.
- 3.5.7 There is the potential for the Friston Substation to result in impacts on the setting of heritage assets. These impacts were assessed as part of the SPR scheme, and a reassessment as part of the Proposed Project and reported on in this chapter has come to the same conclusion. As such, the construction of the Friston Substation as part of the Proposed Project has the potential to result in impacts on the setting of heritage assets as detailed in the assessment below.
- 3.5.1 The following options with regards to the proposed bridge over the River Fromus have been considered in the assessment as described in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**:
- Option 1: A bridge height of up to 6 m (from the ground level at the abutment to the top of the parapet) with 62 m long approach ramps; and
 - Option 2: A bridge height of up to 4 m (from the ground level at the abutment to the top of the parapet) with 42 m long approach ramps.
- 3.5.2 There is also optionality regarding the converter station construction compound location. Any one of the three areas of land included within the Order Limits (S02, S03 and S04/05), as illustrated in **Application Document 2.14.1 Indicative General Arrangement Plans – Suffolk** could be used for this purpose. For the purpose of this assessment, it has been assumed that construction works could happen anywhere within the Order Limits, although it is acknowledged that only one of the temporary construction compounds at Saxmundham Converter Station would be required.

Sensitivity Test

- 3.5.3 It is likely that under the terms of the draft DCO, construction could commence in any year up to five years from the granting of the DCO which is assumed to be 2026. Consideration has been given to whether the effects reported would be any different if the works were to commence in any year up to year five. Where there is a difference, this is reported in Section 3.12.

3.6 Study Area

- 3.6.1 The Study Area of 500 m from the Order Limits for designated and non-designated heritage assets has been adopted to inform the baseline study. A second wider Study Area of 2 km from the main permanent above ground infrastructure (i.e. the Saxmundham Converter Station, Friston Substation, and River Fromus Crossing) has been adopted for impacts on the setting of designated assets. The rationale for the Study Area is explained in **Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report**. The Study Area allows cultural heritage assets to be set within their wider context, in line with the guidance for cultural heritage desk-based

assessment, and allows for the assessment of archaeological potential within the Order Limits and assessment of the setting of heritage assets within the Order Limits and the surrounding landscape.

- 3.6.2 Both the 500 m Study Area adopted to inform the baseline and the wider 2 km Study Area used to assess impacts on setting were agreed with the Archaeological Advisor for SCC and the Inspector of Ancient Monuments at Historic England at the EIA scoping stage.

3.7 Baseline Conditions

- 3.7.1 This section presents a summary of the existing baseline and predicted future baseline conditions for cultural heritage assets relevant to the assessment presented in this chapter.
- 3.7.2 Key heritage assets which have the potential to be impacted by the Proposed Project are identified in this chapter and their values detailed such that the potential impacts can be proportionally assessed. The archaeological potential of the Order Limits is likewise described to enable the impacts upon archaeological remains and deposits therein to be proportionally assessed.
- 3.7.3 A detailed baseline is set out in **Application Document 6.3.2.3.A Appendix 3.3.A Cultural Heritage Baseline Report**. A gazetteer of heritage assets is provided in **Application Document 6.3.2.3.B Appendix 2.3.B Cultural Heritage Gazetteers**. The location of heritage assets, previous archaeological events and indicative illustrations of historic landscape character are presented in **Application Document 6.4.2.3 Cultural Heritage (Application Documents 6.4.2.3.2 to 6.4.2.3.5)**.

Existing Baseline

Geology and Topography

- 3.7.4 The Suffolk Onshore Scheme extends from the landfall to the north of Aldeburgh (NGR) westwards to the Saxmundham Converter Station site which is located on the eastern side of Saxmundham (NGR) **Application Document 6.4.2.3 Cultural Heritage (Application Document 6.4.2.3.1)**. Passing through a landscape characterised by its gently undulating topography, the Order Limits vary from 10-15 m above ordnance datum (AOD) at Gorse Hill where the Suffolk Onshore Scheme makes landfall, with most of the route sitting at 15-22 m AOD, before rising to 25 m AOD at the Saxmundham Converter Station site.
- 3.7.5 The solid geology varies as the Order Limits pass through the landscape, with the coastline element consisting of Calcarene of the Coralline Crag Formation formed during the Neogene and Quaternary Periods, which changes to Chillesford Church Sand Members, also formed during the Quaternary Period, from the Gorse Hill area (British Geological Survey, 2024). The solid geology remains the same for the Order Limits as they head west until the Friston area where it changes to Crag Group Sands formed during the Neogene and Quaternary Period, with these formations evident for the remaining route (British Geological Survey, 2024).
- 3.7.6 The drift geology of the Order Limits also varies as it transitions from the landfall inland, with the coastal section consisting of marine deposits and tidal flat deposits formed during the Quaternary Period, changing to sand and gravel of the Lowestoft Formation formed during the Quaternary Period where the landscape rises at Gorse Hill (British

Geological Survey, 2024). This drift geology remains the predominant type for much of the Order Limits, although areas of Lowestoft Formation diamicton (including clays) formed in the Quaternary Period have been recorded at the western end of the Order Limits around Friston and Saxmundham (British Geological Survey, 2024).

- 3.7.7 As the Suffolk Onshore Scheme avoids the main settlements, the landscape through which the Order Limits pass is dominated by agricultural land, most of which is used for arable farming. Some limited areas are used for pastoral activities, or are grasslands preserved as habitat, although these areas are largely restricted to the coastal zone.
- 3.7.8 Version 3 of the Historic Landscape Characterisation Map produced in 2012 as part of the regional 'East of England Historic Landscape Characterisation Project' shows the Order Limits as falling within three main categories, with 'Coastal Levels' at the landfall changing to 'Estate Sandlands' at Gorse Hill (Suffolk County Council Archaeological Service, 2012). This remains the main historic landscape type until the Friston/Saxmundham area where 'Ancient Estate Claylands' become the predominant landscape type.
- 3.7.9 Historic Landscape Characterisation data provided by the SCC HER show the coastal area as 'Unimproved Land' with most of the Order Limits from Gorse Hill through to Hazelwood categorised as '18th Century and Later Enclosure', and further sub-categorised as 'Former Common Arable or Heathland'. The majority of land from Hazelwood to Saxmundham is categorised as a 'Post 1950 Agricultural Landscape', with the sub-category 'Boundary Loss From Irregular Co-axial Fields', with two small areas defined as 'Pre 18th-Century Enclosure' sub-category 'Random Fields' near Friston and Sternfield.
- 3.7.10 Both versions of the Historic Landscape Characterisation demonstrate that the landscape through which the Order Limits pass has been dominated by agriculture from at least the 19th century, with this land use continuing into the contemporary landscape.

Designated Assets

- 3.7.11 There are no designated heritage assets located within the Order Limits.
- 3.7.12 There are no World Heritage Sites, Registered Parks and Gardens, Registered Battlefields, or Protected Wrecks located within the 500m or 2km Study Areas.

Scheduled Monuments

- 3.7.13 All Scheduled Monuments are deemed to be of high value as nationally important heritage assets.
- 3.7.14 There are no Scheduled Monuments within the 500 m Study Area or the 2 km Study Area adopted for assessing setting impacts.

Listed Buildings

- 3.7.15 A review of designated assets within the 500 m Study Area identified 33 listed buildings of which four are Grade II* and 29 are Grade II (**Application Document 6.3.2.3.B Appendix 2.3.B Cultural Heritage Gazetteers**). The majority of the Grade II* buildings are medieval churches and consist of the Church of St John the Baptist in Saxmundham (NHLE 1268184), the Church of St Mary Magdalene in Sternfield (NHLE 1278252), and the Church of St Mary in Friston (NHLE 1287864). The remaining Grade II* listed

building is the former Post Mill in Friston (NHLE 1215741), and this asset is also on the Historic England Heritage at Risk Register.

- 3.7.16 The Grade II listed buildings date to the post-medieval and modern periods and are largely focused around the central and western sections of the Suffolk Onshore Scheme. They include groupings within the settlements which the Order Limits pass, as well as dispersed structures (many of which are former and existing farms) associated with the agricultural land use that dominates the area. Farms include Little Moor Farm (NHLE 1215743), Woodside Farm (NHLE 1215744), Wood Farmhouse (NHLE 1231179), High House Farm (NHLE 1216049), and Hill Farmhouse (NHLE 1231296) all of which are located between Friston and Saxmundham.
- 3.7.17 Other more formal houses include Hurts Hall near Saxmundham (NHLE 1268178), Friston House near Friston (NHLE 1216066), and Sternfield House (NHLE 1231300) in Sternfield. The remaining listed buildings largely consist of smaller houses and cottages with groupings in Friston (NHLE 1287871; NHLE 1215751) and Sternfield (NHLE 1278255; NHLE 1278167; and NHLE 1231355). However, two war memorials have also been recorded, and are located in the churchyards at Friston (NHLE 1435814) and Sternfield (NHLE 1458741).
- 3.7.18 Designated assets within the 500 m Study Area between the landfall and Friston are limited to Gorsehill (NHLE 1269753), and a country house dating to 1928 which is located on the eastern side of Leiston Road.
- 3.7.19 A review of the 2 km Study Area from the main above ground infrastructure adopted as part of the assessment of impacts on the setting of designated assets identified a total of 105 listed buildings **Application Document 6.3.2.3.B Appendix 2.3.B Cultural Heritage Gazetteers**. These included nine Grade II* listed buildings and 96 Grade II listed buildings, with the vast majority located in the settlements of Saxmundham and Friston.
- 3.7.20 The Grade II* listed buildings included the churches and post-mill discussed above within the 500m Study Area, with a further three churches recorded consisting of the Church of St Lawrence in Knodishall (NHLE 1215745), the Church of St Mary in Benhall (NHLE 1030902), and Church of St Peter in Kelsale cum Carlton (NHLE 1030668). The remaining two Grade II* listed buildings are both large formal house comprising Buxlow Manor (NHLE 1215749) and The Beeches (NHLE 1365996).
- 3.7.21 The Grade II listed buildings include a large concentration of public and private buildings within Saxmundham, as well as a number of farm houses/former farm houses and larger formal country houses in the agricultural landscape that dominates the Study Area.
- 3.7.22 The Grade I and Grade II* listed buildings are all of high value due to their exceptional architectural, historical, archaeological and/or artistic interest.
- 3.7.23 The Grade II listed buildings are all of medium value due to their special architectural, historical, archaeological and/or artistic interest.

Non-Designated Assets

- 3.7.24 A review of previously recorded assets on the Suffolk HER recorded a total of 97 assets within the Order Limits. These assets are distributed throughout the length of the Order Limits, and represent human activity dating from the prehistoric period onwards. The majority of the previously recorded assets are cropmark sites recorded through aerial photography, and the geophysical survey and evaluation trenching undertaken as part

of the Proposed Project has enhanced the understanding of the remains, as well as their extent and date.

- 3.7.25 Features recorded through the Order Limits include remains associated with settlement and land management/division, however, remains linked to burial have also been recorded. The largest concentrations of features were identified at Gorse Hill (ADB358; ADB014; ADB008; ADB009; ADB202; ADB010; ADB065), the area north of Hazlewood Hall Farm (AECOMS009), Friston (FRS107; KND064; KND066), and the Saxmundham Converter Station Site (SXM085; SNF033; SNF039).
- 3.7.26 The Gorse Hill complex represents a multi-period complex with activity from the Neolithic period onwards, although most remains encountered dated to the Late Iron Age and Roman period with traces of a possible structure and one oven or kiln recorded during the evaluation phase (for full details see **Application Document 6.3.2.3.F Appendix 2.3.F Archaeological Evaluation Trenching Report (Draft)**).
- 3.7.27 Remains identified north of the Hazlewood Hall Farm area include a number of possible enclosures identified through geophysical survey, while a cluster of cremations were identified during the evaluation trenching (AECOMS009). These features have also been dated to the Late Iron Age/Romano-British period.
- 3.7.28 Late Iron Age and Romano-British features have also been recorded in the Friston area, with remains identified as part of the SPR EA1N/EA2 works, as well as during surveys undertaken for the Proposed Project. These include enclosures (FRS107 and KND064), as well as a square enclosure to the north of Friston with possible internal divisions (KND066).
- 3.7.29 The geophysical survey undertaken for the Suffolk Onshore Scheme in the area of the Saxmundham Converter Station also revealed a ring ditch (SNF034), possible enclosures (SNF038; SNF033), and a complex system of smaller enclosures and possible trackways (SXM085). Evaluation trenching confirmed that the ring ditch in the southern section of the field represented a Bronze Age barrow (SNF034), while the more isolated enclosures dated to the Romano-British period (SNF038; SNF033). The most extensive remains, however, consisted of the complex of smaller enclosures, trackways, and possible structures, and the evaluation trenching found that these dated to the medieval period (SXM085).
- 3.7.30 Assets recorded throughout the Order Limits, as well as a review of cartographic and documentary sources, suggest that most of the settlements in the Study Area were well established by the medieval period. As a result, the landscape within which the Suffolk Onshore Scheme is located has been largely agricultural in nature from at least the medieval period with the exception of the Saxmundham Converter Station field where the aforementioned medieval remains were identified during the geophysical survey and evaluation trenching (SXM085).
- 3.7.31 The most extensive later remains within the Order Limits are features associated with the conflicts of the 20th century. These include remains of the former First World War Hazelwood Aerodrome recorded through historic mapping, geophysical survey, and evaluation trenching, and extensive remains of Second World War defences recorded through historic aerial photographs, geophysical survey, and evaluation trenching at the eastern end of the Order Limits.

Surveys Carried out for the Suffolk Onshore Scheme

- 3.7.32 As part of the evaluation and assessment process of the Suffolk Onshore Scheme, a number of surveys were undertaken within the Order Limits. These are fully discussed in **Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report**, and the other technical reports provided as appendices to this chapter as set out in Section 3.1.

Site Walkover Surveys

- 3.7.33 A number of site visits were conducted covering the Order Limits as well as the wider area as part of the setting assessment. These did not identify any new assets, and also noted that a number of the previously recorded assets, including features such as Second World War defences recorded from wartime period aerial photography, had been lost or filled in. Full details of the walkover surveys are provided in **Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report**, while site photos are included in **Application Document 6.3.2.3.C Appendix 2.3.C Site Photos**.

Geophysical Survey

- 3.7.34 A geophysical survey was undertaken in 2023, with the survey focused on the areas of the Order Limits that would be subject to surface works/disturbance, and as a result did not include the area where trenchless construction techniques would be employed, the use of which, such as at landfall, would avoid impacts to buried archaeological remains.
- 3.7.35 In general, the survey provided additional information relating to the extent of a number of previously recorded assets including the multi-period site at Gorse Hill (ADB008; ADB014), as well as sites recorded around Friston (FRS107) and south of Saxmundham (SXM003; SXM087).
- 3.7.36 A number of new features were recorded, with a concentration of features within the Saxmundham Converter Station site including a ring ditch (SNF034), and small enclosure (SNF033; SNF039), and extensive settlement remains in the central and northern area of the field (SXM085).
- 3.7.37 Other previously unrecorded assets included possible enclosures near Hazlewood Hall Farm (AECOMS009).
- 3.7.38 Full details of the geophysical survey are included in **Application Document 6.3.2.3.D Appendix 2.3.D Geophysical Survey Report**.

Aerial Photographic and LiDAR Review

- 3.7.39 A review of aerial photographs as well as LiDAR data was undertaken for the Order Limits as well as the Study Area. This noted that the majority of the area had been previously examined as part of the National Mapping Project, and as a result a thorough examination of aerial photographs had been undertaken.
- 3.7.40 This study undertaken for the Proposed Project confirmed the presence of a number of previously recorded assets including banks and ditches associated with Second World War defences at the eastern end of the Order Limits, thereby enhancing the information held on the area. A limited number of possible field boundaries were also noted, with most recorded on historic mapping. Full details of the aerial photographic and LiDAR

review can be found in **Application Document 6.3.2.3.E Appendix 2.3.E Aerial Photography and LiDAR Report**.

Archaeological Evaluation Trenching

- 3.7.41 A programme of archaeological evaluation trenching was undertaken, and included targeted trenching designed to investigate features recorded by the geophysical survey and aerial photography. Areas that appeared blank/free from archaeological features were also tested, with the trenching focusing on the areas of greatest disturbance (i.e. excavation pits for trenchless installation, the cable route, compounds, and permanent access). The proposed temporary access roads and overhead line works were not subject to evaluation trenching due to the limited disturbance predicted from these works, and the low archaeological potential for the area.
- 3.7.42 The evaluation trenching confirmed that the data collected during the geophysical survey was accurate and a good representation of the buried archaeological remains in the area. Trenching in areas such as Gorse Hill and the Saxmundham Converter Station site confirmed the distribution of features, the character of the remains, and also provided some dating evidence. It also noted that most areas that appear to be blank in the geophysical survey data were free from archaeological remains.
- 3.7.43 Data collected was also used to help confirm the value (significance) of heritage assets, and it was noted that the remains encountered at Gorse Hill were of regional significance rather than of international significance, and as such were considered to be of medium rather than high value.
- 3.7.44 The trenching also noted that current agricultural practices were actively damaging some buried archaeological features with truncation resulting from ploughing visible, while some of the later Second World War features had also damaged earlier archaeological deposits (i.e. parts of the Gorse Hill complex).
- 3.7.45 Results of the archaeological evaluation are included in **Application Document 6.3.2.3.F Appendix 2.3.F Archaeological Evaluation Trenching Report (Draft)**.

Geoarchaeological Assessment

- 3.7.46 A geo-archaeological assessment has not been undertaken as part of the assessment due to the limited potential for palaeo-environmental deposits of national significance to survive within the Order Limits. However, a review of the Ground Investigation (GI) works undertaken as part of the design development for the Proposed Project recorded peat deposits in the area of the proposed landfall north of Aldeburgh. The GI data noted the presence of peat at approximately 5.2 m below ground level, however, these appear to be localised deposits as similar remains were not encountered inland to the west and therefore the deposits are unlikely to derive from an extensive buried landform and may be associated with the Mear (ADB160). This former harbour and subsequent wetland area was also used as a turbary which may have resulted in the loss of organic deposit.

Future Baseline

- 3.7.47 This section considers changes to the baseline conditions described above that might occur in the absence of the Proposed Project, and during the time period over which the Proposed Project would have been in place.

- 3.7.48 Based on available information, there are no reasons to expect that there would be any marked change in the cultural heritage baseline in the absence of the Proposed Project.
- 3.7.49 In the absence of the Proposed Project, land within the Order Limits is anticipated to continue as agricultural land with the majority of the land used as arable, with the existing settings of built heritage assets retained. In addition, it is not considered likely that significant numbers of designated built heritage assets would be added to the baseline during the lifespan of the Proposed Project.
- 3.7.50 Changes to buried archaeological remains which might occur during the lifespan of the Proposed Project, in the absence of the Proposed Project, would be minimal and limited to typical taphonomic processes such as erosions, especially resulting from arable cultivation.

3.8 Proposed Project Design and Embedded Mitigation

- 3.8.1 The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce cultural heritage impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project.
- 3.8.2 As set out in **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology**, mitigation measures typically fall into one of three categories: embedded measures; control and management measures; and mitigation measures. Embedded, and control and management measures are set out below. Additional mitigation measures are discussed in Section 3.10.

Embedded Measures

- 3.8.3 Embedded measures have been integral in reducing, and where possible avoiding, the cultural heritage effects of the Proposed Project. Measures that have been incorporated are:
- Sensitive routeing and siting of infrastructure and temporary works as set out in the paragraph below; and
 - Commitments made within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)**.
- 3.8.4 The Suffolk Onshore Scheme has been carefully considered to avoid, reduce or mitigate likely significant effects on cultural heritage assets. Cultural heritage mitigation measures which have been embedded into the design of the Suffolk Onshore Scheme include:
- **Avoidance** – where practicable, cultural heritage assets have been avoided in order to reduce or remove potential impacts upon them. Refinement of the proposals has taken place in a staged, iterative manner as the potential impacts of the Suffolk Onshore Scheme are understood (for example following the site investigation as noted below). For instance, the LoD have been altered in the area north of the proposed Friston Substation where an enclosure with internal divisions has been recorded through geophysical survey (KND066) (H04).
 - **Investigation** – a programme of archaeological evaluation surveys has been undertaken to inform the design and the impact assessment. This has identified areas of archaeological interest that have been set out as heritage buffer areas

within the Suffolk Onshore Scheme design to enable preservation in-situ and protection of these remains (H04).

Control and Management Measures

- 3.8.5 Measures relevant to the control and management of impacts during construction have been included within **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice (CoCP)**. The following measures have been taken into account in assessing the cultural heritage effects of the Proposed Project:
- H01: construction of the Proposed Project would employ the use of track matting for construction plant, where practicable, as opposed to topsoil stripping for the creation of haul roads. This measure would avoid permanent impacts to buried archaeological remains that may be present.
 - H02: To minimise change to the setting of heritage assets, land used temporarily will be reinstated to its pre-construction condition and use, where practicable, unless agreed otherwise. Hedgerows, fences and walls (including associated earthworks and boundary features) will be reinstated to a similar style and quality to those that were removed, where possible, with landowner consultation, through CoCP measure GG07. This is subject to the DCO provisions on reinstatement.
 - H03: To minimise light intrusion into the setting of heritage assets, construction lighting will be of the lowest levels necessary to safely perform each task. It will be designed, positioned and directed to reduce light spill and intrusion, through CoCP measure GG21.

3.9 Assessment of Impacts and Likely Significant Effects

- 3.9.1 This section sets out the likely significant effects of the Suffolk Onshore Scheme on cultural heritage, whilst considering the embedded mitigation and control and management measures as detailed in Section 3.8 of this chapter.
- 3.9.2 The following provides a proportionate assessment of likely significant effects on cultural heritage. As such, only those assets which are considered likely to be impacted by the Suffolk Onshore Scheme, as informed by the desk-based research, evaluation surveys and professional judgement, are discussed. Those assets which would not experience an impact, either physically or through changes to their setting, are omitted. Details of assets within the Study Areas, but not impacted by the Suffolk Onshore Scheme, are provided in **Application Document 6.2.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report**.

Heritage Assets Scoped into the Assessment

- 3.9.3 The cultural heritage baseline assessment presented in **Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report** has identified the potential for impacts to designated and non-designated heritage assets within the Order Limits and Study Areas as a result of the Suffolk Onshore Scheme. Plot numbers mentioned in Section 3.9 of this ES chapter are shown on **Application Document 6.4.2.3.1**.
- 3.9.4 Designated heritage assets scoped into further assessment comprise:
- Wood Farm Grade II Listed Building (NHLE1231179);

- Saxmundham Conservation Area;
- St John the Baptist Church Grade II* (NHLE1268184);
- Hurts Hall Grade II Listed Building and Associated Parkland (NHLE1268178; SXM017; SXM077); and
- Hill Farm Grade II listed building (NHLE1231296).

3.9.5 Non-designated heritage assets scoped into further assessment comprise:

- The Mear (ADB160);
- Gorse Hill Multi-Period Complex (ADB358; ADB014; ADB008; ADB009; ADB202; ADB010; ADB065; AECOMS004) and Second World War Anti-Diver Site (ADB067, ADB068);
- Fragmentary Linear Cropmarks (ADB201; AECOMS005);
- Second World War Anti-Tank Obstacles and Anti-Diver Battery (ADB034; ADB039; ADB334; AECOM006);
- Geophysical anomalies (AECOMS007);
- Possible Trackway West of Chapel Barn Farm (FRS103; AECOMS008);
- Hazlewood Airfield and Possible Trackway (FRS017);
- Possible Enclosure North of Hazelwood Farm (FR105) and linear features (FRS105; AECOMS009);
- Possible Enclosure East of Park Farm (FR106);
- Possible Field System Northeast of Park Farm (FR108/AECOMS010);
- Possible Field Systems and Quarry Pits North of Park Farm (AECOMS011 and AECOMS012);
- Geophysical Anomalies Possibly Relating to Enclosures and Settlement Activity (FR092; FRS107);
- Linear Features and Quarrying (AECOMS013);
- Possible Enclosures (KND064 & AECOMS014);
- Boundaries and Quarrying Remains (AECOMS015);
- Square Enclosure with Internal Features (KND066);
- Possible Enclosure Northeast of Hill Farm (SNF038);
- Enclosures, trackways, and possible structures at Saxmundham Converter Station (SXM085; SNF033; SNF039);
- Possible ring-ditch at Saxmundham Converter Station South (SNF034);
- Various remains including a possible cremation, a possible roundhouse, and a former quarry or pond (AECOMS017-019); and
- Double Line Cropmark South of Saxmundham (SXM003; SXM087);

Construction Phase

- 3.9.6 This section identifies potential permanent impacts and resulting likely significant effects arising from the construction phase of the Suffolk Onshore Scheme.
- 3.9.7 As stated in Section 3.3 of this chapter, temporary impacts arising from changes to the setting of heritage assets during the construction phase of the Proposed Project have been scoped out, as it is recognised that the temporary and reversible nature of the impact would not result in a significant effect.
- 3.9.8 Permanent and irreversible long-term (for the lifespan of the Suffolk Onshore Scheme) impacts lasting beyond the construction phase may arise as a result of the following activity:
- Any below ground activities, including but not limited to groundworks, planting, earth-moving operations, topsoil removal for haul road or compound locations, trenches for cabling, the construction of above ground infrastructure including the Friston Substation, Saxmundham Converter Station and new OHL, and associated infrastructure, that are required for the construction of the Suffolk Onshore Scheme, as described in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project**. This is because all of the principal Suffolk Onshore Scheme components, either entirely or in part, would entail impacts to the existing ground surface, resulting in the physical disturbance, truncation or removal of archaeological remains that may be present.
 - Construction activities such as site clearance, resulting in the partial or total loss of important elements of the historical landscape including hedgerows and areas of ridge and furrow through physical impacts.
 - Impacts through change to the setting of heritage assets as a result of the introduction of the physical form and appearance of the Suffolk Onshore Scheme within their setting (long-term for the lifespan of the Suffolk Onshore Scheme, but reversible at decommissioning).

Designated Assets

- 3.9.9 There are no designated heritage assets located within the Order Limits and as such there would be no physical impacts on designated assets resulting from the Suffolk Onshore Scheme. Further to this, and as stated in Section 3.3 of this chapter, impacts on the setting of heritage assets during the construction phase of the Proposed Project have been scoped out due to the limited potential for significant effects, and the temporary nature of the potential impacts.

Non-Designated Assets

- 3.9.10 There are 97 non-designated heritage assets, or groupings of assets, within the Order Limits which could be physically impacted by the Suffolk Onshore Scheme resulting in permanent effects. Plot numbers mentioned in the below impact assessment are shown on **Application Document 6.4.2.3.1 Plot numbers within the Suffolk Study Area**.

Plots 205.4 and 205.5

The Mear (ADB160)

- 3.9.11 The Mear represents an area of land set slightly inland from the current coastline that has previously been recorded as a possible haven or harbour area, as well as turbary or area of peat cutting. The name is still retained for the very northern end of the area which is used a lake for recreation, while most of the area has been the focus of reclamation and drainage with the land largely used for agriculture and as a nature reserve.
- 3.9.12 There are no traces of surface features surviving within the asset, and the GI works undertaken as part of the Proposed Project within the footprint of the Mear did not note any organic remains with Crag Group Sands to approximately 20 m below current ground level when London Clay was recorded (full details of the GI works can be found in the factual report (Structural Soils Limited, 2024)). However, a borehole undertaken to the east of the asset did record peat at approximately 5.2 m below current ground level, with possible Tidal Flat Deposits above and below the peat. These results might suggest that any organic deposits in the area of the Mear have been removed through peat cutting/extraction that took place while it operated as a turbary, and this extraction may have contributed to the landscape of the Mear being lower than the coastline to the east.
- 3.9.13 The asset has archaeological and historic interest due to the information it might contain relating to the management of the landscape of the coastline in this area. It is considered to be of local importance and is therefore of low value.
- 3.9.14 While the assets fall within the Order Limits, there are no surface works proposed in this area as part of the Suffolk Onshore Scheme, with the cable installation in this area making landfall via a trenchless installation method. While peat has not been recorded within the borehole undertaken in the Mear, it was recorded to the east of the asset and therefore there is the potential for impacts on any geo-archaeological remains that might survive, although these are considered to be minimal due to the limited nature of the works. This would result in a small magnitude of impact. On an asset of low value, this would result in a **negligible adverse** effect which is not considered to be significant.

Plots 193.1 and 193.2

Gorse Hill Multi-Period Complex (ADB358; ADB014; ADB008; ADB009; ADB202; ADB010; ADB065) and Second World War Anti-Diver Site (ADB067, ADB068)

- 3.9.15 A large multi-period site has been identified at Gorse Hill with remains dating from the Neolithic period onwards. This was originally recorded through aerial photography and some limited surveys. The geophysical survey undertaken as part of the Proposed Project has provided further details linked to the extent of the asset. This was followed by evaluation trenching which investigated anomalies and also tested blank areas. While stray finds include material dating to the Neolithic, Iron Age, Roman, Medieval, and Post-Medieval Periods, features recorded as part of the evaluation phase include possible structures, enclosure ditches, and at least one kiln with most remains dating to the Roman period.
- 3.9.16 The complex has archaeological and historic interest due to the information it might contain relating to settlement and land use in the area, particularly during the prehistoric

and Roman periods, as well as the later use of the area as part of the wartime defences for the region. While there has been some truncation of earlier features as a result of the modern military activity, this disturbance is concentrated in the eastern areas of the asset. The type of features identified during the evaluation trenching, as well as the level of preservation, would suggest the asset is of regional importance, and is therefore of medium value.

- 3.9.17 The multi-period complex falls within the Order Limits and the Suffolk Onshore Scheme has the potential to result in physical impacts as a result of works including the installation of the cable, the construction of the trenchless installation excavation pits, and general temporary access works. While large areas of the complex would be avoided due to the reduction of the Order Limits, the Suffolk Onshore Scheme would result in the loss of areas of the asset including possible enclosure as well as part of a possible structure. It would not, however, result in the loss of all elements of this feature, and this would result in a medium magnitude of impact. On an asset of medium value, this would result in a **moderate adverse** effect which is considered to be significant.

Plot 152.9

Fragmentary Linear Cropmarks (ADB201; AECOMS005)

- 3.9.18 A series of fragmentary cropmarks were recorded through aerial photography (ADB201), with the geophysical survey undertaken as part of the Proposed Project identifying a continuation of the features in the northern half of the field (AECOMS005). These features were not investigated as part of the evaluation works due to works being undertaken as part of the extension of Aldeburgh Golf Course, however, they are assumed to represent a post medieval trackway which can be seen heading south towards the Red House and Aldeburgh on the Ordnance Survey mapping in the late 19th century.
- 3.9.19 The features have some archaeological interest due to the information they might contain relating to land use in the area, as well as some limited historic interest. As a post-medieval trackway, it is assumed to be of local importance, and therefore deemed to be of low value.
- 3.9.20 The remains fall within the Order Limits and the Suffolk Onshore Scheme has the potential to result in physical impacts from the installation of the cable and haul road. However, it is assumed the remains may have been removed or damaged by works associated by the Aldeburgh Golf Course extension works that commenced in 2024. Furthermore, only a small section of the asset would be lost as remains of the feature have been recorded in the southern section of the field outside of the Order Limits. Therefore, the Suffolk Onshore scheme would result in a small magnitude of impact. On an asset of low value, this would result in a **negligible adverse** effect which is not considered to be significant.

Plot 152.1

Second World War Anti-Tank Obstacles and Anti-Diver Battery (ADB034; ADB039; ADB334; AECOM006)

- 3.9.21 A series of features forming part of the Second World War military defences in the area have been recorded within Parcel 152 of the Suffolk Onshore Scheme. These include anti-tank obstacles as well as an Anti-Diver Battery. Both of which were recorded

through a review of 1940s aerial photographs. While no traces of the Anti-Diver Battery survive as surface features, a slight linear ditch along the field boundary might be associated with the anti-tank works. The geophysical survey in the area of the features did identify some disturbance suggesting that remains might exist as buried remains, however, evaluation trenching was not undertaken due to construction works associated with the expansion of Aldeburgh Golf Course.

- 3.9.22 The value of the assets largely stem from their archaeological and historic interest relating to the information they contain, as a group of features, relating to the development of coastal defences during the Second World War. They are considered to be of local importance, and as such the assets have been deemed to be of low value.
- 3.9.23 The remains fall within the Order Limits, and the Suffolk Onshore Scheme has the potential to result in physical impacts from the installation of the cable and the associated haul road. However, it is assumed the remains may have been removed or damaged by works associated by the Aldeburgh Golf Course extension which started in 2024. Furthermore, most evidence for the remains come from wartime aerial photographs and it is assumed most elements were removed after the end of the Second World War. The Suffolk Onshore Scheme would also only result in impacts on a very small element of the complex, with the main focus of the Anti-Diver Battery located to the south of the Order Limits. Therefore, the Suffolk Onshore Scheme would result in a small magnitude of impact. On an asset of low value, this would result in a **negligible** effect which is not considered to be significant.

Plot 152.3

Area of geophysical anomalies (AECOMS007)

- 3.9.24 A limited number of features were recorded during the geophysical survey and review of LiDAR data, including possible ditches and a star shaped feature. The ditches were assumed to relate to former field systems, with the evaluation trenching supporting this due to all the linear features being on the same alignment. A single sherd of pottery dating to the Roman period was recovered. The trenching also suggested that the star shaped feature was a hollow filled with colluvium.
- 3.9.25 The value of the assets largely stem from their archaeological and historic interest, including the information they contain relating to earlier field systems and land management. They are considered to be of local importance, and as such the of assets are been deemed to be of low value.
- 3.9.26 The remains fall within the Order Limits, and the Suffolk Onshore Scheme has the potential to result in physical impacts from the installation of the cable and the associated haul road. The Suffolk Onshore Scheme has the potential to partially remove an element of the features that continue outside of the Order Limits. Therefore, the Suffolk Onshore Scheme would result in a small magnitude of impact. On an asset of low value, this would result in a **negligible adverse** effect which is not considered to be significant.

Plots 58.28 and 58.29

Possible Trackway West of Chapel Barn Farm and Geophysical Anomalies (FRS103; AECOMS008)

- 3.9.27 A possible trackway was identified through geophysical survey undertaken in Plots 58.28 and 58.29, with evaluation trenching in the area identifying linear features assumed to represent field boundaries, as well as a single Neolithic pit near the western end of the field. Post-medieval quarries have been recorded in the surroundings and the trackway is potentially associated with quarrying activities.
- 3.9.28 The features have some archaeological interest due to the information they might contain relating to land use in the area, as well as some limited historic interest. As a post-medieval trackway which was found to be heavily disturbed/truncated, it is assumed to be of limited importance, and therefore deemed to be of negligible value, while the Neolithic pit is considered to be of local importance and therefore of low value.
- 3.9.29 The remains fall within the Order Limits, and the Suffolk Onshore Scheme has the potential to result in physical impacts from works including the installation of the cable as well as the associated haul road and a temporary infiltration pond. These works would, however, only result in impacts within a small area of the remains as currently understood, with the geophysical survey showing the features continuing outside of the Order Limits. Therefore, the Suffolk Onshore Scheme would result in a small magnitude of impact. On an asset of low value, this would result in a **negligible** effect which is not considered to be significant.

Plots 58.21 and 86.3

Hazlewood Airfield (FRS017)

- 3.9.30 Remains of First World War airfield have been recorded through aerial photographs, historic mapping, and geophysical survey. Evaluation trenching undertaken for the Proposed Project also identified traces of buildings as well as associated remains which largely correspond with plans of the airfield. This included a trackway to west (FRS104) that appears to form part of the airfield.
- 3.9.31 The value of the asset is largely associated with its archaeological and historic interest relating to the information it contains relating to the development of First World War airfields. They are considered to be of local importance, and as such deemed to be of low value.
- 3.9.32 The remains fall within the Order Limits, and the Suffolk Onshore Scheme has the potential to result in physical impacts from works including the installation of the cable and haul road. These would be partially located in an area where building foundations have been recorded, and as a result part of the former airfield would be lost, although historic mapping and period photographs do show it extending over a larger area. Therefore, the Suffolk Onshore Scheme would result in a small magnitude of impact. On an asset of low value, this would result in a **negligible adverse** effect which is not considered to be significant.

Plots 58.26 and 58.6

Possible Enclosure North of Hazelwood Farm (FR105) and Linear Features (FRS104/AECOMS009)

- 3.9.33 Traces of a possible enclosure were recorded through geophysical survey in Plots 58.26 and 58.6, with evaluation excavation identifying a number of possible linear features as well as at least three cremations and one animal burial. The evaluation excavations also suggested that the complex may have continued into the southern section of Plot 58.6, where a temporary construction compound is proposed, although this area appeared to have been previously disturbed. This may have been a result of the construction of the reservoir to the south. While dating evidence was limited, the remains are assumed to date to the Late Iron Age/Romano-British period.
- 3.9.34 The value of the asset is largely associated with its archaeological and historic interest relating to the information it contains relating to settlement activity. It is considered to be of regional importance, and as such deemed to be of medium value.
- 3.9.35 The remains fall within the Order Limits, and the Suffolk Onshore Scheme has the potential to result in physical impacts from works including the installation of the cable and haul road. While the full extent of the remains are not known, the geophysical survey data would suggest the features continue outside of the Order Limits, and as a result the Suffolk Onshore Scheme would not remove all traces of the complex. Therefore, it is assessed that the Suffolk Onshore Scheme would result in a small magnitude of impact. On an asset of medium value, this would result in a **minor adverse** effect which is not considered to be significant.

Plot 58.8

Possible Enclosure East of Park Farm (FR106)

- 3.9.36 Traces of a possible enclosure (E?2) as well as possible disturbance resulting from quarrying (Q?3) was recorded through geophysical survey. Evaluation excavation undertaken as part of the Phase One trenching confirmed the disturbance as former quarry/extraction pits, while the enclosure identified by the geophysical survey was located in Trench 280. Although no dateable evidence was recorded from the enclosure, a ditch recorded in Trench 283 contained Middle Iron Age pottery, suggesting an possible Iron Age date for the enclosure. An isolated pit containing Early to Middle Neolithic pottery was also identified in Trench 277.
- 3.9.37 The value of the assets are largely associated with their archaeological and historic interest relating to the information they contain relating to activity in the Neolithic and Iron Age. They are considered to be of local importance and therefore Low Value.
- 3.9.38 The remains fall within the Order Limits and the Suffolk Onshore Scheme has the potential to result in physical impacts as a result of works including the installation of the cable. While the full extent of the complex is not known, traces have been identified continuing outside of the area of works on the geophysical survey, and they are assumed to form part of a more extensive complex that extends into the wider landscape. Therefore, it is assessed that the Suffolk Onshore Scheme would result in a small magnitude of impact. On an asset of low value, this would result in a **negligible adverse** effect which is not considered to be significant.

Plot 58.8

Possible Field System Northeast of Park Farm (FR108/AECOMS010)

- 3.9.39 Traces of a possible field system have been recorded through geophysical survey in Plot 58.8. The evaluation excavation noted that some features may have been geological, although a number of linear features were identified, and these were interpreted as possible traces of an outlying field system associated with remains more suggestive of settlement in Plot 58.27 to the west. The remains in Plot 58.8 were tentatively dated to the Romano-British period.
- 3.9.40 The value of the asset is largely associated with its archaeological and historic interest relating to the information it contains on land use and activity during the Romano-British period. The features are considered to be of local importance, and as such deemed to be of low value.
- 3.9.41 The remains fall within the Order Limits, and the Suffolk Onshore Scheme has the potential to result in physical impacts from works including the installation of the cable and haul road. While the full extent of the remains are not known, the geophysical survey data would suggest the features continue outside of the Order Limits, and as a result the Suffolk Onshore Scheme would not remove all traces of the field system. Furthermore, the remains in Plot 58.8 appear to represent outlying field systems rather than a settlement activity. Therefore, it is assessed that the Suffolk Onshore Scheme would result in a small magnitude of impact. On an asset of low value, this would result in a **negligible adverse** effect which is not considered to be significant.

Plot 58.27

Possible Field System and Quarry Pits North of Park Farm (AECOMS011 and AECOMS012)

- 3.9.42 Traces of a possible field system/boundary ditches and quarry pits were identified through geophysical survey, with the evaluation excavation undertaken as part of the Phase One works largely confirming the geophysical survey date. Most dateable features were identified at the western end of the Plot near Snape Road, with Trench 211 identifying a ditch containing medieval pottery, while Trench 215 contained pits from which a relatively large assemblage of Bronze Age pottery was recovered. Other features in the plot contained a number of undated quarry pits as well as a small pit containing Neolithic pottery in Trench 221.
- 3.9.43 The value of the assets are largely associated with their archaeological and historic interest relating to the information they contain on land use and activity during the Romano-British period, as well as earlier Bronze Age activity. The features are considered to be of local importance, and as such deemed to be of low value.
- 3.9.44 The remains fall within the Order Limits, and the Suffolk Onshore Scheme has the potential to result in physical impacts from works including the installation of the cable and haul road. While the full extent of the remains are not known, the geophysical survey data would suggest the features continue outside of the Order Limits, and as a result the Suffolk Onshore Scheme would not remove all traces of the field system. Therefore, it is assessed that the Suffolk Onshore Scheme would result in a small magnitude of impact. On an asset of low value, this would result in a **negligible adverse** effect which is not considered to be significant.

Plots 25.1 and 25.2

Geophysical Anomalies Possibly Relating to Enclosures and Settlement Activity (FRS107)

- 3.9.45 Traces of enclosures and possible field systems were recorded in the north east corner of Plot 25.1 as part of the geophysical survey, with possible features extending into Plot 25.2. Most appeared to be related, and did not follow the modern field pattern, with an Iron Age/Romano-British date tentatively assigned. Evaluation excavations had not been undertaken at the time of writing.
- 3.9.46 The value of the complex is largely associated with its archaeological and historic interest relating to the information it contains on land use, and while evaluation excavation have not yet taken place the features have been tentatively dated to the Iron Age/Romano-British period based on their form as well as other similar remains recorded in the area. The features are considered to be of local importance, and as such deemed to be of low value.
- 3.9.47 The remains fall within the Order Limits, and the Suffolk Onshore Scheme has the potential to result in physical impacts as a result of works including the installation of the cable as well as a temporary compound. Based on current knowledge, the main focus of the complex appears to be to the south and in Plot 25.1 which lies outside of the Order Limits. As a result, the complex will be largely avoided with only a small proportion of the asset lost (as currently understood). This would result in a small magnitude of impact which on an asset of low value would result in a **negligible adverse** effect which is not considered to be significant.

Plot 20.1 and 20.2

Linear Features and Quarrying (AECOMS013)

- 3.9.48 A series of anomalies, possibly representing a field boundary (FB3) and former quarrying (Q?6) were identified by geophysical survey in Plot 20.2. The geophysical survey was not undertaken in Plot 20.1.
- 3.9.49 Evaluation excavation was undertaken in both plots as part of the Phase Two trenching, and as such only preliminary results were available at the time of writing. However, these noted that archaeological remains were very limited, and largely consisted of former quarrying as identified by the geophysical survey. The linear features identified on the geophysical survey were also confirmed, although dating evidence was limited to a few small sherds of possible prehistoric pottery. Similar linear features were noted in Plot 20.1 where the geophysical survey had been undertaken, and these also contained a limited number of sherds of prehistoric pottery.
- 3.9.50 The value of the complex is largely associated with its archaeological and historic interest relating to the information it contains relating to land use and activity in the area. Detailed post-excavation has not yet been undertaken as features were uncovered as part of the Phase Two trenching, however a tentative Romano-British period date has been assigned based on similar remains identified to the north as part of the SPR works, and the remains appear to be part of a larger field system rather than suggestive of settlement. The features are considered to be of local importance, based on similar examples recorded in the Study Area, and as such deemed to be of Low Value.

- 3.9.51 The remains, which are assumed to be part of a large field system that extends outside of the Order Limits, will be impacted by the Suffolk Onshore Scheme as a result of works including the installation of the cable as well as a possible infiltration pond. As the features appear to continue outside of the Order Limits, based on current knowledge, is assessed that the Suffolk Onshore Scheme would result in a small magnitude of impact due to the removal of part of the asset. On an asset of low value, this would result in a **negligible adverse** effect which is not considered to be significant.

Plots 28.16 and 28.14

Possible Enclosures (KND064 and AECOMS014)

- 3.9.52 A series of anomalies, possibly representing an enclosure, were identified as part of EA1N/EA2 schemes. The possible enclosure was also confirmed as part of the Phase Two trenching, with no dating evidence recovered, although the features are assumed to date to the Late Iron Age/Romano-British period based on form and similar remains recorded in the surrounding area. The trenching also identified a quarry, as well as a number of possible boundary ditches and pits. Dating evidence was limited to a few sherds of possible medieval pottery.
- 3.9.53 The value of the complex is largely associated with its archaeological and historic interest relating to the information it contains on land use and activity during the later prehistoric and Romano-British periods. The features are considered to be of local importance, and as such deemed to be of low value.
- 3.9.54 The remains fall within the Order Limits, and the Suffolk Onshore Scheme has the potential to result in physical impacts due to works including utilities diversions. Based on current knowledge the Suffolk Onshore Scheme has the potential to result in impacts on a very limited area of the asset. Therefore, it is assessed that the Suffolk Onshore Scheme would result in a small magnitude of impact. On an asset of low value, this would result in a **negligible adverse** effect which is not considered to be significant.

Plot 28.5

Boundaries and Quarrying Remains (AECOMS015)

- 3.9.55 A series of linear features, suggestive of field boundaries, as well as a possible trackway and quarry, were identified as part of the Phase Two trenching. No dating evidence was recovered, although the features are assumed to date to the Post-Medieval period. A number of Neolithic lithics were also recovered from a possible tree throw.
- 3.9.56 The value of the assets is largely associated with their archaeological and historic interest relating to the information they contain relating to land use and activity during the Post-Medieval period, as well as Neolithic activity. The features are of a type and form found frequently throughout the Study Area, and as a result they are considered to be of local importance, and as such deemed to be of Low Value.
- 3.9.57 The remains fall within the Order Limits and the Suffolk Onshore Scheme has the potential to result in physical impacts as a result of works including the installation of the cable. These works, however, will only remove a limited element of the boundaries and they are assumed to form part of a more extensive field system. As a result, the

magnitude of impacts is predicted to be small. On an asset of low value, this would result in a **negligible adverse** effect which is not considered to be significant.

Plot 28.12

Square Enclosure with Internal Features (KND066)

- 3.9.58 A square enclosure with a number of possible internal divisions was first identified through geophysical survey undertaken as part of the EA1N/EA2 schemes in Plot 28.12.
- 3.9.59 Evaluation trenching undertaken as part of the Sea Link Phase Two works confirmed the presence of the enclosure, with evidence all suggesting a Roman date. The trenching did, however, note the site had been extremely truncated with some features recorded on the geophysical survey now appearing to be ploughed out.
- 3.9.60 The value of the complex is largely associated with its archaeological and historic interest relating to the information it contains relating to settlement and land use/activity during the Roman period. The features are considered to be of local importance as they are of a form common in the region, and have been extensively damaged by ploughing., As such, they are deemed to be of Low Value.
- 3.9.61 The remains fall within the Order Limits, and the Suffolk Onshore Scheme has the potential to result in physical impacts on these from the installation of the cable and haul road. The LoD in this area have been moved to the southern section of the field to limit the impacts on the asset through avoidance. Therefore, it is assessed that the Suffolk Onshore Scheme would result in a small magnitude of impact. On an asset of low value, this would result in a **negligible adverse** effect which is not considered to be significant.

Plots 3.1, 3.4, 5.1, and 13.1

Geophysical Survey Anomalies of Possible Enclosures and Linear Features (KND047)

- 3.9.62 Geophysical surveys undertaken as part of the EA1N/EA2 and Lion Link schemes have identified a series of features to the north of Friston in Plots 3.1, 3.4, 5.1, and 13.1. These are assumed to relate to enclosures and associated field systems and have been tentatively dated to the Late Iron Age and Romano-British period based on style/form and on similar remains in the adjacent fields, and some linear features may also be post-medieval field boundaries. The majority of the features are located in the southern area of the field and fall within EA1N/EA2 schemes mitigation area.
- 3.9.63 The value of the remains is largely associated with their archaeological and historic interest relating to the information they may contain relating to settlement and land use/activity during the late prehistoric and Romano-British periods, as well as the post-medieval period. The features are considered to be of local importance, and as such deemed to be of low value.
- 3.9.64 The remains fall within the Order Limits and the Suffolk Onshore Scheme has the potential to result in physical impacts from the underground cable installation and access track works. However, mitigation in this area is being undertaken as part of the EA1N/EA2 schemes and as a result it is assumed that any impacts would have been mitigated as part of the EA1N/EA2 schemes. As such there would be no impact and no effect from the Suffolk Onshore Scheme.

Plot 91.22

Possible Enclosure Northeast of Hill Farm SNF038

- 3.9.65 A small possible enclosure was identified in Plot 91.22 as part of the Sea Link geophysical survey. This was investigated as part of the evaluation trenching exercise, with a possible oven, ditches, and a pit also identified during the trenching. Possible traces of cultivation activity was also noted, with a number of evenly spaced linear features with a square profile recorded in the same area. While finds were limited, the features were dated to the Romano-British period based on their form, and some limited pottery which was spot dated to the Roman period.
- 3.9.66 The value of the remains is largely associated with their archaeological and historic interest relating to the information they may contain relating to the history and development of settlement and land use during the Romano-British. In isolation, the features may be considered to be of local importance, and as such deemed to be of Low Value. However, as a number of features have been recorded in the adjacent fields, the assets can be seen to form part of a larger landscape and as such they are considered to be of regional importance. They are therefore deemed to be of medium value.
- 3.9.67 The remains fall within the Order Limits and the Suffolk Onshore Scheme has the potential to result in physical impacts from the underground cable installation and access track works. Based on the current understanding of the extent of the features, the Suffolk Onshore Scheme would potentially result in the loss of the features and the loss of their archaeological interest. This would result in a large magnitude of impact. On an asset of low value, this would result in a **moderate adverse** effect which is considered to be significant.

Plot 421.3 and 422.1

Saxmundham Converter Station (SXM085; SNF033; SNF039)

- 3.9.68 An extensive complex consisting of enclosures, trackways, and possible structures was recorded in the northern end of Plots 421.3 and 422.1 (SXM085) with further remains recorded in the southwestern area of Plot 422.1 during the geophysical survey conducted as part of the Proposed Project. The features were investigated as part of the evaluation trenching which found the geophysical survey data provided an accurate representation of the extent of the features. While dating evidence was limited, pottery and brick suggested that most remains were found to date to the medieval period, with traces of post-medieval field boundaries also recorded. Traces of earlier activity was also recorded to the south of the medieval complex, with at least two possible cremations and two heavily truncated pits containing burnt clay and flint recorded. These have all been dated to the Bronze Age.
- 3.9.69 The value of the remains are largely associated with their archaeological and historic interest relating to the information they may contain on the history and development of settlement and land use during the medieval period, as well as possible Bronze Age burial rites. Further earlier features have been identified in the same field, and as such the assets can be seen to form part of a larger landscape and are considered to be of regional importance. They are therefore deemed to be of medium value.
- 3.9.70 An element of the remains fall within the Order Limits and the Suffolk Onshore Scheme, with most of the complex falling outside of the Order Limits. Works which have the

potential to result in physical impacts include temporary access track works and drainage, as well as mitigation associated with the construction of the Saxmundham Converter Station. Furthermore, the location of the temporary construction compound required for the construction of the Saxmundham Converter Station has not yet been decided and one of the options has the potential to impact on SXM085. As a result, a worse-case scenario has been adopted which assumes the temporary construction compound would be located in the area of SXM085.

- 3.9.71 Based on these assumptions, the Suffolk Onshore Scheme has the potential to result in the partial loss of the medieval enclosures and field system. Based on current knowledge, the most complex area (based on the geophysical survey data) would appear to fall outside of the Order Limits and would therefore remain preserved. It is considered the impacts on the remains that fall within the Order Limits would therefore result in a medium magnitude of impact on the overall complex. On an asset of medium value, this would result in a **moderate adverse** effect which is considered to be significant.

Plot 421.3

Saxmundham Converter Station South, Ring Ditch (SNF034)

- 3.9.72 A possible ring-ditch was identified in the southern limits of Plot 421.3 during the geophysical survey undertaken for the Proposed Project. Intrusive investigations undertaken as part of the evaluation trenching identified a barrow ring-ditch which contained some sherds of Bronze Age pottery, although no traces of barrow mound material was recorded. A possible isolated cremation was also recorded to the east of the ring-ditch, while a pit containing a Bronze Age pottery vessel was recorded in the same approximate area.
- 3.9.73 The value of the remains are largely associated with their archaeological and historic interest stemming from the information they may contain on the funerary and ritual activities during the Bronze Age. Further remains have been identified in the same field, and as such the asset forms part of a larger multi-period landscape and is considered to be of regional importance. They are therefore deemed to be of medium value.
- 3.9.74 The ring-ditch falls within the Order Limits and within the footprint of attenuation drainage required for the Saxmundham Converter Station. Construction would fully remove the asset. Therefore, the magnitude of impact is considered to be large. On an asset of medium value, this would result in a **major adverse** effect which is considered to be significant.

Geophysical Survey Anomalies of Possible Iron Age/Romano-British, and Early Medieval Settlement Site (SNF035)

- 3.9.75 Possible remains of an Iron Age or Romano-British settlement site were recorded as part of the Lion Link geophysical survey in Plot 91.28. The features have been tentatively dated on their form, as well as the presence of similar features in the surrounding area, although their date has not been confirmed through intrusive investigation.
- 3.9.76 The value of the remains are largely associated with their archaeological and historic interest stemming from the information they may contain on settlement and land use in the Iron Age/Romano-British period. Based on current knowledge they are assumed to

be a type relatively common in the area and are considered to be of local interest. They are therefore deemed to be of low value.

- 3.9.77 Only a very small section of the asset, as currently understood, falls within the Suffolk Onshore Scheme, and possible intrusive works are limited to access works (part of which is an upgrade of an existing track) and an attenuation drainage connection and outfall that have the potential to disturb a small area within this area of the Order Limits. As such, the magnitude of impact is considered to be negligible. On an asset of low value, this would result in a **negligible** effect which is not considered to be significant.

Plot 468.1

Various remains including a possible cremation, a possible round house, and a former quarry or pond (AECOMS017-019)

- 3.9.78 Geophysical survey of the plot revealed limited new information, however, evaluation trenching undertaken as part of the Phase Two works identified a limited number of assets. These included a possible cremation (AECOMS017), a possible former quarry or pond (AECOMS018), and a potential round house gully (AECOMS019).
- 3.9.79 The value of the remains is largely associated with their archaeological and historic interest stemming from the information they may contain relating to settlement and land use around Saxmundham, and possibly the development of the parkland associated with Hurts Hall, as well as earlier burial activities. However, it should be noted that the cremation was fully excavated and recovered and therefore the asset serves to provide information relating to the potential for similar remains to survive in the area. Based on current knowledge the assets of various periods are assumed to be of local interest, and are therefore deemed to be of Low Value.

The assets are all located along the route of the permanent access, as well as near an area of permanent drainage. As a result, the Suffolk Onshore Scheme has the potential to result in physical impacts, primarily as a result of the construction of the permanent access, although based on current information the works will not result in the total loss of remains due to them extending outside of the area of works. It is therefore assessed that the Suffolk Onshore Scheme will result in a small magnitude of impact. On an asset of low value, this would result in a **negligible adverse** effect which is not considered to be significant.

Double Line Cropmark South of Saxmundham (SXM003; SXM087), Possible 18th century building and cremations (AECOMS016)

- 3.9.80 Two parallel linear features running on a north-south alignment have been identified through aerial photography in Plot 468.5 to the south of Saxmundham. The features were also recorded through geophysical survey, and are presumed to relate to an earlier road or trackway leading into Saxmundham. Evaluation excavations are to be undertaken as part of the second phase of evaluation excavations for the Proposed Project, and as such detailed results are not available at the time of writing. However, site observations note that there is limited evidence for the trackway surviving, although other remains encountered include traces of a possible building tentatively dated to the 18th century, and a at least two cremations that also have a tentative Bronze Age date based on form/style.
- 3.9.81 The value of the remains are largely associated with their archaeological and historic interest stemming from the information they may contain relating to settlement and land

use around Saxmundham, and possibly the development of the parkland associated with Hurts Hall. While the full details of the features identified as part of the Phase Two trenching are not known, they appear to include a prehistoric cremation and post-medieval structure. The cremation could provide information relating to prehistoric burial activities, although as an excavated feature that has been removed it serves to provide information relating to the potential for similar remains to survive in the area. The post-medieval structure could provide information relating to the land use and settlement activity prior to the Hurts Hall parkland being formalised. Based on current knowledge they are assumed to be of local interest. They are therefore deemed to be of low value.

- 3.9.82 The main focus of the archaeological remains encountered are the lower areas of the field near the Fromus River, with works in the area including a temporary compound, drainage ponds, and the permanent access works. While these works will potentially result in the partial loss of some remains, the main area of the post-medieval structure is now excluded from the Order Limits, with works in the area of the structure limited to less intrusive drainage works. As such, the structure will be largely avoided.
- 3.9.83 Other remains will also only be partially removed, and as a result the Suffolk Onshore Scheme will result in the partial loss of remains. Therefore, it is assessed that the Suffolk Onshore Scheme would result in a small magnitude of impact. On an asset of low value, this would result in a **negligible adverse** effect which is not considered to be significant.

Possible quarries and extraction pits

- 3.9.84 A number of possible quarry or extraction pits were identified by the geophysical survey and evaluation trenching. Most of these features, where investigated by the evaluation trenching, did not contain any dating evidence and as a result most remain undated. Possible quarries or pits associated with cut features, such as enclosures or ditches, have been assessed above as part of the complexes which they are assumed to be linked to. The remaining pits/quarries are considered as isolated features in the landscape. These features are indicative of historic quarrying in the area and, as isolated features with no association with known archaeological activity, they have negligible archaeological and historical interest. Construction has the potential to result in the permanent loss of the former quarry pits which would constitute a large impact. This would result in a minor adverse effect which is not significant.

Field boundaries and hedgerows

- 3.9.85 The majority of the hedgerows and boundaries that survive throughout the Suffolk Onshore Scheme can be traced on mapping from at least the mid-19th century, although many appear to have been replanted or replaced with more recent boundaries.
- 3.9.86 They have some historic value stemming from their place in the history and development of the landscape in the post-medieval period, and possibly earlier. They are, however, a type of common in the Study Area as well as wider Suffolk landscape, and therefore deemed to be of low value.
- 3.9.87 These assets are located in various areas of the Suffolk Onshore Scheme, and have the potential to experience permanent impact by various works during construction. The scope of the works would result in the removal of a small section of hedgerow, for example to create temporary access, and would not constitute the total loss of the asset or a significant alteration. The impact is therefore assessed to be small, which would result in a negligible effect.

Operation and Maintenance Phase

- 3.9.88 Taking into account the embedded mitigation measures in Section 3.8 of this chapter, the following provides an assessment of the likely significant effects arising from the operation and maintenance phase of the Suffolk Onshore Scheme.
- 3.9.89 Operational impacts lasting for all or part of the operation and maintenance phase of the Suffolk Onshore Scheme comprises the following:
- Impacts on the setting of assets resulting from the addition of new above ground infrastructure associated with the Suffolk Onshore Scheme.
- 3.9.90 The impact of the introduction of the physical form and appearance of the Suffolk Onshore Scheme during construction would result in a continued effect on the setting of heritage assets through the operation and maintenance phase. The presence of infrastructure or plant screening during the lifespan of the Suffolk Onshore Schemes operation, after the active construction phase has been completed, may cause changes or alterations to the setting of heritage assets, which may be beneficial or adverse. These impacts are long-term in respect of infrastructure, for the operation and maintenance duration of the Suffolk Onshore Scheme, but are reversible upon decommissioning.
- 3.9.91 Planting is assessed in this chapter as permanent and not reversible, however the planting proposed is not considered to result in adverse impacts to heritage assets through changes to their setting.
- 3.9.92 Once operational, the underground components of the Proposed Project, such as the underground cables, would not result in any changes to the setting of heritage assets.
- 3.9.93 It is not expected that the operation and maintenance of the above ground infrastructure (i.e. the Saxmundham Converter Station, Friston Substation, and OHL works) would result in any further intrusive activities and, as such, no impact to below ground archaeological remains is anticipated during this phase.
- 3.9.94 Designated assets within 2 km of the proposed above ground infrastructure have been reviewed in combination with Zone of Theoretical Visibility (ZTV) data produced for the Proposed Project (**Application Document 6.4.2.3.6 Designated Assets within the wider 2km study area adopted for setting impacts - Suffolk**) and **Application Document 6.3.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report**. This review examined how the setting of an asset contributes to its heritage value and included if there are any key views of or towards the asset that contributed to its value.
- 3.9.95 Only a limited number of designated assets within the 2 km Study Area were identified as having a potential to experience change, as the majority of assets fall outside of the ZTV and/ or the land within the Order Limits does not contribute to their setting. As such, these assets were scoped out of the impact assessment and the rationale for their scoping out is included in **Application Document 6.2.2.3.A Appendix 2.3.A Cultural Heritage Baseline Report**.
- 3.9.96 Consultation with stakeholders, including ESC and Historic England identified that there was the potential for impacts on the following designated assets. These are therefore assessed in this chapter:
- Wood Farm Grade II Listed Building (NHLE1231179);
 - Saxmundham Conservation Area and the Grade II* St John the Baptist Church (NHLE1268184);

- Hurts Hall Grade II Listed Building and Associated Parkland (NHLE1268178; SXM017; SXM077); and
- Hill Farm Grade II Listed Building (NHLE1231296).

Wood Farm Grade II Listed Building (NHLE1231179)

- 3.9.97 The Grade II listed Wood Farm is located adjacent to the Order Limits in the area of Saxmundham Converter Station. The 17th century building has been subject to alterations during the 19th and 20th century and suffered significant damage to its historic elements as a result of a fire in 2023. Originally linked to Hurts Hall to the west by means of a wooded avenue, this link appears to have been largely severed with the track removed and only limited trees surviving as a relic of the former connection.
- 3.9.98 Its immediate surroundings, which contribute to its setting, are dominated by a working farm, with large barns and other agricultural structures to the north, while woodland borders the asset to the south and west. The agricultural fields that surround the farm form the functional setting to the farmhouse and working farm, and provides the enduring associative relationship between the farmhouse and the area's agricultural economy.
- 3.9.99 As a Grade II listed building it is considered to be of medium value, with its heritage value deriving from its architectural and historical interests. The farmhouse is an example of a rural building built in a local style, using local materials and comprises a timber-framed and plastered building with a brick gable end to the west and a later rendered brick wing to the south. However, large sections of the structure, including the later brick gable, were damaged and demolished as a result of a fire, with the structural report submitted as part of the application to demolish the building noting that the remaining fabric was of little historic value.
- 3.9.100 The proximity of the Saxmundham Converter Station would constitute new built form into the functional setting of the farmhouse, and the visual impact of its presence is illustrated on **Application Document 6.4.2.3.8-A Representative Viewpoint Visualisations**, which shows the view from Wood Farm looking to the south-east. The presence of Saxmundham Converter Station would not affect the ability to appreciate the associative relationship between the farmhouse and the agricultural landscape, but it would introduce a prominent, large-scale industrial feature into the farmhouse's visual setting that would be incongruous with the farmhouse's small-scale and agricultural character. This impact would result in a noticeably different setting and would therefore constitute a medium impact, resulting in a **moderate adverse** effect, which is significant.

Saxmundham Conservation Area and the Grade II* St John the Baptist Church (NHLE1268184)

- 3.9.101 The majority of the designated assets are located within the settlement of Saxmundham, a Conservation Area located at the western end of the Suffolk Onshore Scheme to the west of the Saxmundham Converter Station. Archaeological excavations in the town have recovered evidence of activity from the prehistoric period onwards, although the settlement probably had its origins in the early medieval period and continued to develop as a key market town in the medieval period.
- 3.9.102 The setting of the settlement is key to its understanding and significance, with the Conservation Area Appraisal highlighting elements such as the former parkland

associated with Hurts Hall to the south (East Suffolk Council, 2016). While this parkland, which is discussed separately in paragraph 3.9.105, has been degraded as a result of its conversion to arable land, its rural nature is highlighted as key to understanding the settlement when approaching from the south.

- 3.9.103 As a Conservation Area containing a number of Grade II* listed buildings, including the Church of St John the Baptist, the settlement and its associated assets are considered to be of high value. The value largely derives from the architectural and historic interest.
- 3.9.104 The majority of assets within the Conservation Area are screened from the Saxmundham Converter Station by the topography as well as the intervening built environment. Their settings are defined by their position within the town and by their contribution to the streetscape of the town. This results in an intimate setting and experience, with views channeled and framed by the town's buildings on either side of the roads and views out of the conservation area not contributing to its experience. The approach to the Conservation Area to the south would experience change, as the operational above ground components, including the Saxmundham Converter Station and the Fromus Crossing, would be perceptible in approach views. However, visualizations which illustrate the level of visual change when approaching from the south (**Application Document 6.4.2.1.10-B Representative Viewpoint 2**) confirm that Saxmundham Converter Station and the permanent access over the River Fromus would be visible. This would not result in change to the heritage value of the conservation area, but it would constitute change to a viewpoint of historical importance that contributes to the sense of arrival to the conservation area. Recognising that the change is to the experience of a view and not to the heritage value of the conservation area, the impact is assessed to be small. This would constitute a **moderate adverse** effect, which is significant.

Hurts Hall Grade II Listed Building and Associated Parkland (NHLE1268178; SXM017; SXM077)

- 3.9.105 The Grade II listed Hurts Hall is located on the southern edge of Saxmundham, and approximately 185 m north of the Order Limits. The current hall (designed T. W. Cotman (The Suffolk and Essex Free Press, 1890)) was built in the late 19th century after the previous hall (built by Samuel Wyatt in 1803) was destroyed by fire in 1889. The hall underwent various alterations in the 20th century, and was used as the Major General Sir Percy Hobarts headquarters during the Second World War when he was developing the specialist vehicles, or 'Hobarts Funnies' that were key to the success of the D-Day landings. During this period, the area known as 'The Layers' to the southwest was used to billet men, while Churchill, Montgomery, and Eisenhower visited Hurts Hall to approve plans for D-Day. The hall was sold in the opening years of the 21st century, and is now separated from the parkland as a result of the different owners. The house was subject to an extensive programme of restoration in the 21st century after being taken over by the current owner.
- 3.9.106 The hall is set within formal gardens, which were re-established as part of the 21st century restoration, and a wider parkland. Both the inner formal gardens and wider parkland are not designed, and the wider parkland is much degraded. This is largely a result of the removal of field boundaries and trees to create large open arable fields, which is a significant change from the landscape of smaller mixed arable and pasture fields recorded on the historic mapping of the 19th century.
- 3.9.107 Most of the former Hurts Hall parkland lies within the area defined as 'Peripheral Area SX2' in the Suffolk Settlement Sensitivity Assessment (Alison Farmer Associates,

2018). This assessment notes that hedgerows have been lost in the parkland, and identifies the reinstatement of hedgerows and replanting of parkland trees as a way to enhance the character of the area and the approach to the town.

- 3.9.108 Hurts Hall represents a key building on the southern side of Saxmundham, and while it lies outside of the Conservation Area, the Conservation Area Appraisal notes that the setting of the Conservation Area is much enhanced by the Hurts Hall parkland which provides 'attractive rural character before entering the density of the town' (East Suffolk Council, 2016). The Conservation Area Appraisal also notes the importance of views towards both Hurts Hall and the Grade II* listed Church of St John the Baptist (NHLE1268184) which is located to the north of Hurts Hall, from the B1121 to the south. The church is linked to the hall by a private track, while the main access to the hall is via a driveway that starts at the southern edge of the town.
- 3.9.109 The importance of views from the B1121 of Hurts Hall, the relict parkland that surround it, and the church, are also highlighted by the recently adopted Saxmundham Neighbourhood Plan (East Suffolk Council, 2023). This document also notes the importance of views from landscape known as The Layers, on the western side of the B1121, towards Hurts Hall, recognising that the woodland on the ridge to the east of Hurts Hall which provides a marked contrast to the open landscape of the Fromus Valley. Both views are considered key and Policy SAX12 of the Saxmundham Neighbourhood Plan states that 'Developments, which would have an unacceptable adverse impact on the landscape character of the view concerned, will not be supported'.
- 3.9.110 As a Grade II listed building, Hurts Hall is considered to be of medium value, and this value largely stems from its architectural interest, and also historic interest for the role the hall estate played in the development of Saxmundham.
- 3.9.111 The principal façade of the Hall is north-facing, with views across parkland and towards Saxmundham town. Historical map evidence shows that the non-designated parkland is much denuded through the loss of footpaths and trees to agricultural land, which has affected the integrity of its original design, and its aesthetic and artistic interest. However, despite the erosion of its design, the parkland provides a sympathetic and pleasing backdrop to Hurts Hall which contributes to the experience and aesthetic setting of the house. Formal designed gardens to the west and south of the house comprise its domestic setting and contribute to its aesthetic experience and appreciation.
- 3.9.112 Agricultural fields lie beyond the parkland to the west, south and east of the house and would be appreciable in views from the formal gardens to the south of the house. The visual connection between the fields and the house articulates the historical associative relationship between the house and the lands within its ownership, and contributes to its wider setting and heritage value.
- 3.9.113 The proposed permanent access route and a new permanent bridge over the River Fromus, would be constructed through the agricultural fields to the south of the hall, approximately 210 m from the hall at its closest point. The presence of the permanent bridge is unlikely to be visible from the gardens surrounding the hall or from the hall itself due to the presence of woodland along the river's banks, and it is unlikely to constitute perceptible change within the hall's setting from this location. It is assessed therefore that the access road and permanent bridge would constitute a small magnitude of impact, resulting in a **minor adverse** effect which is not significant.

- 3.9.114 The proposed Saxmundham Converter Station is also unlikely to be perceptible in views from the gardens of Hurts Hall, and this is demonstrated by **Application Document 6.4.2.3.8-B Representative Viewpoint Visualisations** which shows that Saxmundham Converter Station would be screened by existing vegetation and would not result in change to the visual setting and experience from this location.
- 3.9.115 The experience of views of Hurts Hall within its relict parkland from the B1121, which is identified as an important view in Saxmundham Neighbourhood Plan (East Suffolk Council, 2023), has the potential to change as a result of the presence of Saxmundham Converter Station and the permanent bridge access over the River Fromus.
- 3.9.116 Embedded landscape mitigation will introduce native hedgerow and tree planting around the Converter Station and plantation along the route of the River Fromus that would partially screen views of the Converter Station and the new permanent bridge over the River Fromus. **Application Document 6.4.2.1.10-B Representative Viewpoint 2** demonstrates that at year 1 operation the presence of the permanent crossing (2 m and 4 m clearance) over the River Fromus would constitute a noticeable change in the foreground of the view. Combined with the presence of Saxmundham Converter Station in the background of the view, this would represent a noticeable change to the experience and appreciation of Hurts Hall within its associated parkland, and would be incongruous with the rural setting that contributes to its heritage value. This would constitute a medium impact on an asset of medium value, resulting in a **moderate adverse** effect, which is significant.

Hill Farm Grade II listed building (NHLE1231296)

- 3.9.117 Hill Farm Grade II listed building has origins in the 17th century and comprises an 'L'-shaped farmhouse with a mid-century porch and other later alterations. The house is surrounded by a small woodland which results in an intimate setting and although channelled views to the south and east are possible, towards arable land which contributes to its historical relevance and functional setting, long-range views do not form part of the farmhouse's experience. The woodland which surrounds the farmhouse precludes views towards the Suffolk Onshore Scheme and of the proposed Saxmundham Converter Station. **Application Document 6.4.2.3.8-D Representative Viewpoint Visualisations** demonstrates that the operational Saxmundham Converter Station would not be perceptible in views from the farmhouse, and would not introduce change to the experience and setting of the farmhouse, and no change to its heritage value. It is assessed there would be no impact to Hill Farm and no effect.

Decommissioning Phase

- 3.9.118 Following the decommissioning of the Suffolk Onshore Scheme, it is considered that all elements would be removed in accordance with the relevant statutory process at that time. It is expected that the selected method of decommissioning would have due regard to health and safety, environmental impact and benefits, and economic aspects which would be set out in a written scheme of decommissioning which would be submitted for approval to the relevant planning authority prior to any decommissioning works taking place. Any future maintenance, decommissioning and/or reinstatement works would be subject to prevailing legislation, guidance and permitting regimes. Landscape restoration and remediation to suitable surfaces would be undertaken. This would result in the restoration of the rural landscape. A well-designed decommissioning scheme would not have any impact beyond the already-disturbed footprint of the Suffolk

Onshore Scheme, with elements such as compounds assumed to be located in the same location as those used for construction where possible.

- 3.9.119 It is assumed for the purpose of this assessment that there would be no additional permanent effects on below ground archaeological remains during decommissioning activities. Decommissioning would be undertaken within the same footprint used during construction and therefore any impact to buried archaeological remains would have occurred, and would have been mitigated, at the construction phase.
- 3.9.120 There would be temporary effects to the setting of designated assets in the Study Area during decommissioning, resulting from the use of machinery to dismantle the Suffolk Onshore Scheme. Effects arising from decommissioning activities would be temporary and the duration would be shorter than potential effects during construction. As such, as temporary effects to heritage assets have been scoped out of the construction phase due to the unlikelihood for significance effects to arise, it follows that significant effects during decommissioning are also unlikely.
- 3.9.121 All long-term (for the lifespan of the Proposed Project) 'reversible' adverse effects reported in the cultural heritage chapter would be removed during the decommissioning phase. The removal of the cause of this effect, by means of the removal of any above ground element of the Proposed Project during decommissioning, would result in no effect to cultural heritage assets.

3.10 Additional Mitigation and Enhancement Measures

- 3.10.1 Additional topic and site-specific mitigation measures that have been applied to mitigate or offset any likely significant effects are included in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)**.
- 3.10.2 Measures that are relevant to the mitigation of potential permanent, physical impacts to cultural heritage assets and which are covered in further detail within **Application Document 7.5.4.1 Suffolk Outline Onshore Overarching Written Scheme of Investigation** include the following:
- H05 – Locations of known archaeological interest/value to be preserved *in situ*, or areas where archaeological work is planned, would be signposted/fenced off to avoid unintentional damage.
 - H06 – Where a previously unknown heritage asset is discovered, or a known heritage asset proves to be more significant than predicted at the time of application for Development Consent, then the Archaeology Advisor for Suffolk County Council should be informed and a solution agreed that protects the significance of the new discovery, so far as is practicable, within the Proposed Project parameters.
 - H07 – Archaeological excavation, recording, and publication to be undertaken where archaeological features cannot be avoided. Scope of works to be agreed with the Archaeology Advisor for Suffolk County Council, and any other relevant heritage stakeholders, prior to works commencing in the relevant area and detailed in the **Suffolk Outline Onshore Overarching Written Scheme of Investigation** or a site specific WSI.
 - H08 – Archaeological Strip, Map, and Record, to be undertaken in pre-agreed areas of archaeological potential/features. Scope of works to be agreed with the Archaeology Advisor for SCC, and any other relevant heritage stakeholders prior to

works in the relevant area commencing and detailed in the **Suffolk Outline Onshore Overarching Written Scheme of Investigation** or a site specific WSI.

- H09 – Archaeological Watching Brief to be undertaken in pre-agreed areas of archaeological potential/features. Scope of works to be agreed with the Archaeology Advisor for SCC, and any other relevant heritage stakeholders prior to works commencing in the relevant area and detailed in the **Suffolk Outline Onshore Overarching Written Scheme of Investigation** or a site specific WSI.
- H10 – Geoarchaeological modelling/profiling in areas of potential. Scope of works to be agreed with the Archaeology Advisor for SCC, and any other relevant heritage stakeholders prior to works commencing and detailed in the **Suffolk Outline Onshore Overarching Written Scheme of Investigation** or a site specific WSI.

- 3.10.3 Potential direct impacts on buried archaeological remains would be managed through a programme of additional mitigation which includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. The guiding principles and methodology for the planning and implementation of the archaeological mitigation are set out in the **Application Document 7.5.4.1 Suffolk Outline Onshore Overarching Written Scheme of Investigation** to be agreed with the Archaeology Advisor at SCC as part of the DCO process.
- 3.10.4 **Application Document 7.5.4.1 Suffolk Outline Onshore Overarching Written Scheme of Investigation** includes a requirement for site-specific WSI to be produced by the Applicant's Archaeological Contractor to achieve the mitigation measures. The site-specific WSI would be agreed with the Archaeology Advisor for SCC, and any other relevant heritage stakeholders prior to the commencement of the archaeological works.
- 3.10.5 Archaeological mitigation works would focus primarily on the areas of buried archaeological remains identified and characterised during the geophysical survey and archaeological trial trenching undertaken for the Proposed Project.
- 3.10.6 While the final fieldwork report for all trial trench evaluation is required in order to confirm the heritage value and spatial extent of the remains that would be impacted, the assessment and outline mitigation measures have been based on current information from the draft report submitted as **Application Document 6.3.2.3.F Appendix 2.3.F Archaeological Evaluation Trenching Report (Draft)**.
- 3.10.7 Preservation of the archaeological remains where works are not required within the Order Limits would require protective measures, such as fencing, during construction, operation and decommissioning activities to avoid unintentional damage (**H05**). Potential impacts to buried archaeological remains that cannot be avoided by design can be mitigated through a proportionate programme of archaeological investigation, recording and reporting, such as open area archaeological excavation in advance of construction, archaeological monitoring during intrusive activities, and further assessment and analysis of existing samples/finds retrieved during previous evaluation surveys, which would form additional mitigation (**H07**). This would not result in a reduction in the physical impacts to archaeological remains but would compensate for their loss as it would provide greater understanding and appreciation of the evidential value of archaeological remains.
- 3.10.8 Based on the current information, archaeological excavation, recording, and publication (**H07**) may be required in a number of areas where important archaeological remains have been identified. Further details are provided in the **Application Document 7.5.4.1 Suffolk Outline Onshore Overarching Written Scheme of Investigation**. Following

receipt of the final fieldwork report for the trial trench evaluation, the scope and type of mitigation to be applied to each area would be set out in an updated Suffolk Onshore Overarching Written Scheme of Investigation, which would be agreed with the Archaeological Advisor at SCC and submitted during Examination as the final version.

- 3.10.9 Additional mitigation measures that have been designed to minimise change to the setting of heritage assets from the physical presence of the Suffolk Onshore Scheme include landscape planting proposals, are detailed in **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk**.
- 3.10.10 As part of the proposed planting mitigation, areas of soft landscaping/screening around parts of the perimeter of the Suffolk Onshore Scheme have been built into the design of the Saxmundham Converter Station and Friston Substation. The aim is to reduce the visual impacts of the infrastructure and thus reduce impact upon the settings of heritage assets. This landscaping has been carefully considered to integrate itself into the existing landscape and largely comprises the enhancement of existing hedgerows/ boundaries. For instance, planting is proposed around the Saxmundham Converter Station to reduce the visual impact of the new infrastructure when viewed from the surrounding landscape. This is especially pertinent for views from the west. Hedgerow and tree planting is also proposed to help screen the new permanent access south of Saxmundham and the proposed bridge over the River Fromus. This would both screen the permanent access and partially restore the character of the former parkland in this area which was previously a landscape of smaller fields.
- 3.10.11 Landscape planting proposals for the Suffolk Onshore Scheme, as described in **Application Document 6.2.2.1 Chapter 1 Landscape and Visual**, are considered as additional mitigation proposals for the purposes of the cultural heritage impact assessment. This approach recognises that at year 1 operation, the growth of advanced planting would not be of a sufficient height to have a material change in views and, where it is intended to do so, would not sufficiently screen the built components of the Suffolk Onshore Scheme from heritage assets. As such, in order to assess and identify the worst case scenario for impacts to heritage assets through setting change, and to record the realistic duration of the impact, the effects of the Suffolk Onshore Scheme at year 15 operation, when the landscape planting has achieved its full height, is regarded as an additional mitigation measure and is taken into account when assessing the residual effects of the Suffolk Onshore Scheme.

3.11 Residual Effects and Conclusions

- 3.11.1 Table 3.12 and Table 3.13 summarise the residual effects of the Proposed Project on cultural heritage receptors following the implementation, where necessary, of additional mitigation measures outlined in Section 3.10.

Table 3.12 Summary of residual cultural heritage (Construction)

Receptor	Sensitivity	Description of Impact	Likely Significant Effect		Additional Mitigation Measures	Residual Effect	
			Magnitude	Significance		Magnitude	Significance
The Mear (ADB160)	Low	Direct physical impacts resulting from HDD (permanent)	Small	Negligible	None required to mitigate significant effect. To be agreed in line with the Suffolk OWSI and is likely to include H05; H06; H07; H08; H09; H10.	Negligible	Not Significant
Gorse Hill multi-period complex (ADB358; ADB014; ADB008; ADB009; ADB202; ADB010; ADB065) and later Second World War Anti-Diver site (ADB067, ADB068)	Medium	Direct physical impacts (permanent)	Medium	Moderate	To be agreed in line with the Suffolk OWSI and is likely to include H05; H06; H07; H08; H09.	Minor	Not Significant
Fragmentary Linear Cropmarks (ADB201; AECOMS005)	Low	Direct physical impacts (permanent)	Small	Negligible	None required to mitigate significant effect. To be agreed in line with the Suffolk OWSI and is likely to include H05; H06; H07; H08; H09.	Negligible	Not Significant

Receptor	Sensitivity	Description of Impact	Likely Significant Effect		Additional Mitigation Measures	Residual Effect	
			Magnitude	Significance		Magnitude	Significance
Second World War Anti-Tank Obstacles and Anti-Diver Battery (ADB034; ADB039; ADB334; AECOM006)	Low	Direct physical impacts (permanent)	Small	Negligible	None required to mitigate significant effect. To be agreed in line with the Suffolk OWSI and is likely to include H05; H06; H07; H08; H09.	Negligible	Not Significant
Area of Geophysical Anomalies (AECOMS007)	Low	Direct physical impacts (permanent)	Small	Negligible	None required to mitigate significant effect. To be agreed in line with the Suffolk OWSI and is likely to include H05; H06; H07; H08; H09.	Negligible	Not Significant
Possible Trackway West of Chapel Barn Farm and geophysical anomalies (FRS103; AECOMS008)	Negligible	Direct physical impacts (permanent)	Small	Negligible	None required to mitigate significant effect. To be agreed in line with the Suffolk OWSI and is likely to include H05; H06; H07; H08; H09.	Negligible	Not Significant

Receptor	Sensitivity	Description of Impact	Likely Significant Effect		Additional Mitigation Measures	Residual Effect	
			Magnitude	Significance		Magnitude	Significance
Hazlewood Airfield (FRS017)	Low	Direct physical impacts (permanent)	Small	Negligible	None required to mitigate significant effect. To be agreed in line with the Suffolk OWSI and is likely to include H05; H06; H07; H08; H09.	Negligible	Not Significant
Possible Enclosure North of Hazelwood Farm (FR105) and linear features (FRS104; AECOMS009)	Medium	Direct physical impacts (permanent)	Small	Minor	None required	Negligible	Not Significant
Possible enclosure east of Park Farm (FRS106)	Low	Direct physical impacts (permanent)	Small	Negligible	None required	Negligible	Not Significant
Possible Field System Northeast of Park Farm (FR108/AECOMS010)	Low	Direct physical impacts (permanent)	Small	Negligible	None required	Negligible	Not Significant
Possible Field System and Quarry Pits North of Park Farm (AECOMS011 and AECOMS012)	Low	Direct physical impacts (permanent)	Small	Negligible	None required to mitigate significant effect. To be agreed inline with the Suffolk OWSI and is	Negligible	Not Significant

Receptor	Sensitivity	Description of Impact	Likely Significant Effect		Additional Mitigation Measures	Residual Effect	
			Magnitude	Significance		Magnitude	Significance
					likely to include H05; H06; H07; H08; H09.		
Geophysical Anomalies Possibly Relating to Enclosures and Settlement Activity (FRS107)	Low	Direct physical impacts (permanent)	Small	Negligible	None required to mitigate significant effect. To be agreed in line with the Suffolk OWSI and is likely to include H05; H06; H07; H08; H09.	Negligible	Not Significant
Linear Features and Quarrying (AECOMS013)	Low	Direct physical impacts (permanent)	Small	Negligible	None required to mitigate significant effect. To be agreed in line with the Suffolk OWSI and is likely to include H05; H06; H07; H08; H09.	Negligible	Not Significant
Possible Enclosures (KND064/AECOMS014)	Low	Direct physical impacts (permanent)	Small	Negligible	None required to mitigate significant effect. To be agreed in line with the Suffolk OWSI and is	Negligible	Not Significant

Receptor	Sensitivity	Description of Impact	Likely Significant Effect		Additional Mitigation Measures	Residual Effect	
			Magnitude	Significance		Magnitude	Significance
					likely to include H05; H06; H07; H08; H09.		
Boundaries and Quarrying Remains (AECOMS015)	Low	Direct physical impacts (permanent)	Small	Negligible	None required to mitigate significant effect. To be agreed in line with the Suffolk OWSI and is likely to include H05; H06; H07; H08; H09.	Negligible	Not Significant
Square Enclosure with Internal Features (KND066)	Low	Direct physical impacts (permanent)	Small	Negligible	None required to mitigate significant effect. To be agreed in line with the Suffolk OWSI and is likely to include H05; H06; H07; H08; H09.	Negligible	Not Significant
Geophysical Survey Anomalies of Possible Enclosures and Linear Features (KND047)	Low	No impact	No impact	No effect	N/A	No effect	No effect
Possible Enclosure Northeast of Hill Farm (SNF038)	Medium	Direct physical	Large	Moderate	To be agreed in line with the Suffolk OWSI	Minor	Not Significant

Receptor	Sensitivity	Description of Impact	Likely Significant Effect		Additional Mitigation Measures	Residual Effect	
			Magnitude	Significance		Magnitude	Significance
		impacts (permanent)			and is likely to include H05; H06; H07; H08; H09.		
Saxmundham Converter Station (SXM085; SNF033; SNF039)	Medium	Direct physical impacts (permanent)	Medium	Moderate	To be agreed in line with the Suffolk OWSI and is likely to include H05; H06; H07; H08; H09.	Minor	Not Significant
Saxmundham Converter Station South, Ring Ditch (SNF034)	Medium	Direct physical impacts (permanent)	Large	Major	To be agreed in line with the Suffolk OWSI and is likely to include H05; H06; H07; H08; H09.	Minor	Not Significant
Various remains including a possible cremation, a possible round house, and a former quarry or pond (AECOMS017-019)	Low	Direct physical impacts (permanent)	Small	Negligible	None required to mitigate significant effect. To be agreed in line with the Suffolk OWSI and is likely to include H05; H06; H07; H08; H09.	Negligible	Not Significant

Receptor	Sensitivity	Description of Impact	Likely Significant Effect		Additional Mitigation Measures	Residual Effect	
			Magnitude	Significance		Magnitude	Significance
Double Line Cropmark South of Saxmundham (SXM003; SXM087), Possible 18 th century building and cremations (AECOMS016)	Low	Direct physical impacts (permanent)	Small	Negligible	None required to mitigate significant effect. To be agreed in line with the Suffolk OWSI and is likely to include H05; H06; H07; H08; H09.	Negligible	Not Significant
Possible quarries and extraction pits	Low	Direct physical impacts (permanent)	Small	Negligible	None required to mitigate significant effect. To be agreed in line with the Suffolk OWSI and is likely to include H09.	Negligible	Not Significant
Field boundaries and hedgerows	Low	Direct physical impacts (permanent)	Small	Negligible	None required. Mitigation will consist of reinstatement as part of ecological and landscape and visual mitigation	Negligible	Not Significant

Table 3.13 Summary of residual cultural heritage effects (Operation and Maintenance)

Receptor	Sensitivity	Description of Impact	Likely Significant Effect		Additional Mitigation Measures	Residual Effect	
			Magnitude	Significance		Magnitude	Significance
Wood Farm Grade II Listed Building (NHLE1231179)	Medium	Impacts on setting (long term temporary)	Medium	Moderate	Planting/ screening to limit views of the Converter Station would reduce the impact arising from the visual change, as illustrated on Application Document 6.4.2.3.8-A Representative Viewpoint Visualisations.	Minor	Not Significant
The approach from the south to Saxmundham Conservation Area	High	Impacts on setting (long term temporary)	Small	Moderate	Planting/ screening to limit views of the Converter Station, permanent access and River Fromus crossing in approach from the south.	Minor	Not Significant
Views of Hurts Hall Grade II Listed Building and Associated Parkland (NHLE1268178; SXM017; SXM077) from the B1121	Medium	Impacts on views and appreciation of hall's setting (long term temporary)	Medium	Moderate	Planting/ screening to limit views of the Converter Station, permanent access and River Fromus crossing.	Minor	Not Significant
Hill Farm Grade II listed building (NHLE1231296)	Medium	Impacts on setting (long	No impact	No effect	None required	No effect	No effect

Receptor	Sensitivity	Description of Impact	Likely Significant Effect		Additional Mitigation Measures	Residual Effect	
			Magnitude	Significance		Magnitude	Significance
		term temporary)					

Construction

- 3.11.2 At construction, four non-designated heritage assets, comprising buried archaeological remains, are assessed to experience significant effects. The assets comprise:
- Gorse Hill multi-period complex of medium value which would experience a moderate adverse effect;
 - A possible Enclosure Northeast of Hill Farm which would experience a moderate adverse effect;
 - Bronze Age settlement-archaeology at Saxmundham Converter Station which would experience a moderate adverse effect; and
 - A Bronze Age ring ditch at Saxmundham Converter Station which would experience a major adverse effect.
- 3.11.3 Additional mitigation measures detailed within **Application Document 7.5.4.1 Suffolk Outline Onshore Overarching Written Scheme of Investigation**, and itemised in Section 3.10 of this chapter will be implemented to either protect, and preserve the remains *in situ*, or to excavate and record them archaeologically. The successful completion of the additional mitigation measures will reduce the effect to minor adverse, and not significant, for all assets.

Operation and Maintenance

- 3.11.4 The following designated heritage assets have been assessed to experience a significant effect due to the presence of Saxmundham Converter Station within their setting:
- Wood Farm Grade II listed building of medium value would experience a moderate adverse effect from change to its setting;
 - Hurts Hall Grade II listed building of medium value would experience a moderate adverse effect from change to its setting; and
 - Saxmundham Conservation Area would experience a moderate adverse effect as a result of change in the experience of views in the approach from the south.
- 3.11.5 Additional mitigation measures detailed in **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk** will reduce the visual impacts of the infrastructure and reduce the level of visual change to the settings of the heritage assets.
- 3.11.6 The visual impact of Saxmundham Converter Station on Wood Farm Grade II listed building at year 15 operation (summer), when the planting has achieved its full height, is illustrated on **Application Document 6.4.2.3.8-A Representative Viewpoint Visualisations**. This demonstrates that Saxmundham Converter Station would not be visible from the farmhouse and would not change or detract from its rural setting. Glimpses of the converter station may be possible during the winter periods when there would be less dense vegetation, but this would not constitute a significant change to the visual component of the farmhouse's setting. The residual effect at year 15 operation is therefore assessed to be **minor adverse**, which is not significant.
- 3.11.7 The visual impact of Saxmundham Converter Station on Hurts Hall Grade II listed building and its associated parkland at year 15 operation (summer) is illustrated on

Application Document 6.4.2.1.10-B Representative Viewpoint 2. This visualisation shows the level of change as experienced from the B1121, which is identified as a view of historical importance in Saxmundham Neighbourhood Plan (East Suffolk Council, 2023). The visualisation for year 15 operation demonstrates the effectiveness of the native hedgerow and tree planting around Saxmundham Converter Station and the new permanent bridge over the River Fromus. The converter station is visible but not prominent in the view from the B1121, and is blended into the edges of the mature vegetation of Bloomsfield's Covert. The permanent bridge is no longer visible in the view. The experience and historical relevance of the view of Hurts Hall within its associated parkland is maintained and still appreciable, and the presence of the converter station in the background of views does not sever the connectivity of the hall to its landscape. The residual effect at year 15 operation is therefore assessed to be **minor adverse**, which is not significant.

- 3.11.8 A slight change in the experience of the approach to Saxmundham Conservation Area is assessed to result in a moderate adverse significant effect due to the high value of the conservation area and, by association, the importance of views that contribute to its experience. The view from the B1121 is identified as an important view in Saxmundham Neighbourhood Plan (East Suffolk Council, 2023) due to its contribution to the sense of arrival to the conservation area. The presence of the new permanent bridge at year 15 operation (**Application Document 6.4.2.1.10-B Representative Viewpoint 2**) is no longer visible and would not represent change in the experience of the viewer due to the maturing of the vegetation along the route of the River Fromus. Further, the maturing of tree planting and native hedgerows creates a layering within the landscape, and helps to partially screen views of Saxmundham Converter Station. The experience of the view remains predominantly rural and the built components of the Suffolk Onshore Scheme are not visually prominent. The residual effect at year 15 operation is therefore assessed to be **minor adverse**, which is not significant.

Decommissioning

- 3.11.9 As assessed in Section 3.9 of this chapter, there would be no effects to heritage assets from decommissioning of the Suffolk Onshore Scheme.

3.12 Sensitivity Testing

- 3.12.1 Under the terms of the DCO, construction could commence in any year up to five years from the granting of the DCO, which is assumed to be 2026. The assessment results reported in this chapter would not change if the works were to commence in any year up to and including year five.

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National Grid plc
National Grid House,
Warwick Technology Park,
Gallows Hill, Warwick.
CV34 6DA United Kingdom

Registered in England and Wales
No. 4031152
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