

SUFFOLK ENERGY ACTION SOLUTIONS'

**REBUTTAL OF NGET RESPONSE TO SEAS RELEVANT REPRESENTATION ON
CULTURAL HERITAGE**

SEA LINK: EN020026

SEAS IP: [REDACTED]

DEADLINE: 2 – December 9, 2025

Date: 9 Dec 2025

This document constitutes SEAS rebuttal to the Applicant's Response to SEAS Relevant Representation [\[RR-5210\]](#), as set out in:

**[\[REP1A-043\]](#) - 9.34.1 Applicant's Comments on Relevant Representations
Identified by the ExA - Specifically Table 2.53 and Appendix A**

For reference- the Applicant's *Appendix A Cultural Heritage- Heritage Impact Assessment* is attached to assist the Examining Authority.

Introduction: Late Submission of Applicant's Comments

1. The Applicant's formal comments on SEAS's Relevant Representation were due by Deadline 1 on 18 November 2025.
2. These comments were not submitted or published until 26 November 2025, eight days late.
3. A further revised version of the document – EN0200260017369.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA, including Appendix A: Cultural Heritage – Heritage Impact Assessment – was only published on 28 November 2025.
4. This sequence of late submissions has deprived Interested Parties of the opportunity to review and respond to the Applicant's material in good time. SEAS and other community groups submitted their Relevant Representations in June 2025 and have consistently met every procedural deadline.
5. SEAS now has only 10 days before Deadline 2 (9 December 2025) to submit comments on the Applicant's late and revised material. This compressed timetable places an unreasonable burden on Interested Parties and undermines the fairness and transparency of the examination process.
6. SEAS formally reserves its position in respect of costs arising from the Applicant's late submission of material.

7. SEAS also reserves the right to submit further evidence beyond Deadline 2, given that the Applicant's formal comments and revised Appendix A: Cultural Heritage – Heritage Impact Assessment submission on 28 November 2025, well after the required Deadline 1 of 18 November 2025.
8. The lateness of these submissions has deprived Interested Parties of the opportunity to review and respond in good time, despite communities having met every deadline since June 2025. SEAS therefore considers it necessary to protect its procedural rights to ensure fairness in the examination process.

Summary

9. This counter-response addresses National Grid Electricity Transmission (NGET)'s Appendix A: Cultural Heritage – Heritage Impact Assessment as well as broader ES information. It demonstrates that the Applicant's assessment is methodologically flawed, policy-non-compliant, and insufficiently evidenced.
10. Appendix A is not an adequate or reliable basis for determining the effects of the Sea Link project on designated heritage assets, their settings, or the wider historic landscape. The assessment suffers from fundamental methodological, evidential, and policy-compliance failures.
11. When judged against the requirements of EN-1, EN-5, the Horlock Rules, and Historic England GPA3, the Applicant's conclusions are unsound, incomplete, and materially misleading.
12. Key failures include:
 - a) Reliance on a defective Landscape & Visual Impact Assessment (LVIA) and artificially narrow study area.
 - b) Reduction of "setting" to visibility and tree screening, contrary to policy and guidance.
 - c) Understatement of asset-level harm, particularly to Hurts Hall, the Church of St John the Baptist, and Saxmundham Conservation Area.
 - d) Failure to assess the major impact of the proposed River Fromus bridge.
 - e) Non-compliance with EN-5 and the Horlock Rules, including misuse of the Rochdale Envelope.
 - f) Absence of cumulative assessment, despite acknowledged co-location of Sea Link and LionLink at Saxmundham.
 - g) Failure to lawfully apply the heritage balance test.

13. When considered alongside SEAS's Cultural Heritage Relevant Representation, including independent David Edleston Heritage Impact Assessment (RR-5210), SEAS Landscape and Visualisation Relevant Representation including Michelle Bolger's expert Landscape Report (RR-5210), and Nicholas Bridge's Relevant Representation & Written summaries of oral submissions (RR-3944 & REP1A-148), it is clear that *Appendix A* cannot provide a reliable foundation for determining heritage impacts.
14. Accordingly, the Examining Authority should give *Appendix A* little weight. Development consent should not be granted unless the project is re-sited or fundamentally redesigned to avoid demonstrable heritage harm.

Policy Framework

15. EN-1 Section 5.9 – Historic Environment requires:

- a) Great weight to be given to conservation of designated heritage assets.
- b) Setting to include the experience of an asset, not limited to visibility.
- c) Harm to be justified with clear and convincing justification, even if less than substantial.
- d) Alternatives and mitigation to be demonstrated.

16. EN-5 – Electricity Networks Infrastructure imposes additional obligations:

- a) Compliance with the Schedule 9 (Electricity Act 1989) duty to preserve natural beauty and historic interest.
- b) Application of the Horlock Rules, requiring avoidance of high-amenity landscapes and sensitive heritage settings.
- c) Demonstration that feasible alternatives have been considered.
- d) Integration of associated works (access roads, bridges, compounds) into the design.
- e) Proper cumulative assessment where multiple network assets converge.

17. *Appendix A* does not demonstrate compliance with these duties.

Methodological Failures

18. Artificially narrow study area: Key receptors excluded, including St Botolph's Church (Iken), Martello Tower CC, Alde Estuary viewpoints, and parts of the AONB/Heritage Coast.
19. Reliance on Defective LVIA: Understates sensitivity, omits key viewpoints, misrepresents rural baseline, and fails to provide compliant visualisations.

20. Misapplication of Setting: Reduced to visibility and screening, ignoring tranquillity, rural character, approach routes, and historic relationships.
21. *Appendix A* reveals a further methodological flaw: the Applicant conflates the assessment of listed buildings within the Saxmundham Conservation Area by treating them only as part of the Conservation Area as a whole. National policy requires that each designated heritage asset be assessed individually. By subsuming the Grade II Church of St John the Baptist into the Conservation Area assessment, the Applicant materially understates harm and misapplies EN-1, NPPF, and Historic England GPA3 guidance.

Asset Assessment Failures

Grade II listed Hurts Hall (NHLE 1268178)

22. The Applicant acknowledges a moderate adverse effect at Year 1, but asserts that by Year 15, planting and screening will reduce the impact to “minor adverse” and therefore “not significant.” They further argue that harm is “less than substantial at the lower end of the scale” and outweighed by public benefits.
23. This conclusion is unsound. Hurts Hall remains highly sensitive to change due to its open, rural setting in the Fromus Valley, its historic parkland associations, and its role as a landmark feature in gateway views approaching Saxmundham from the south.
24. Reliance on speculative Year 15 planting is inadequate. The converter station is proposed at a height of 26 metres, a scale of built form that cannot be effectively screened, particularly in winter months when deciduous vegetation is ineffective.
25. The Applicant’s assessment fails to account for the permanent industrialisation of the Saxmundham gateway. Hurts Hall is experienced in conjunction with the Church of St John the Baptist and the Conservation Area in panoramic views from the B1121 and The Layers. These valued views are recognised in the Saxmundham Conservation Area Appraisal (2016) and protected under Policies SAX10 and SAX12 of the Saxmundham Neighbourhood Plan (2023).
26. The Applicant’s claim that harm reduces to “minor adverse” ignores the foreground intrusion of the River Fromus bridge. This engineered structure, together with the converter station, introduces incongruous industrial elements into a tranquil, undeveloped valley landscape.
27. SEAS expert assessment concludes that the proposed development will result in a moderate adverse impact on Hurts Hall’s setting, persisting beyond Year 15.
28. The Applicant’s assertion that harm is outweighed by public benefits is unsupported. The public benefit case is generic, not location-specific, and

does not demonstrate why this heritage-sensitive site was chosen over alternatives.

29. In conclusion, Hurts Hall will suffer enduring harm to its setting. The Applicant's claim of reduced impact at Year 15 is speculative and misleading. The Examining Authority must attach great weight to the conservation of Hurts Hall and recognise that the proposed development results in moderate adverse harm that is not justified by the evidence presented.

Grade II* Church of St John the Baptist (NHLE 1268184)

30. The Applicant subsumes the Church of St John the Baptist within the Saxmundham Conservation Area assessment, rather than treating it as a separate high-status, Grade II* listed asset. They conclude that the impact is negligible and that the converter station will not alter the heritage value of the church.
31. This conflation is procedurally flawed. The church's landmark role, funerary monuments, and historic relationship with Hurts Hall demand separate assessment. *Appendix A* itself exposes this weakness, offering up a methodological error that materially downgrades the significance of a Grade II*
32. This conclusion is unsound. The church is a landmark building of high significance, with important historic connections to Hurts Hall and funerary monuments of the Long family. Its tower is a prominent feature in the open rural landscape to the south, forming part of the experiential setting of Saxmundham's gateway.
33. The Applicant relies on two submitted views:
- Figure A.1 – View northeast from the B1121 towards the church, demonstrating views limited to gaps in boundary planting.
 - Figure A.2 – View northeast towards the church from the area of the proposed permanent access where it joins the B1121, demonstrating no views of the church due to mature woodland.
34. These views were taken in summer months and do not show the seasonal difference. SEAS submits two views (SEAS Fig 1 & SEAS Fig 2) taken in November 2025 from the same area of the proposed access where it joins the B1121. These clearly demonstrate that the church and Hurts Hall are seen together and are not obscured by mature woodland.
35. This evidence confirms that the Applicant's reliance on summer-only photography misrepresents the year-round experience of the asset. Seasonal variation is critical: in winter months, the church tower and Hurts Hall are visible in conjunction, reinforcing their landmark status in gateway views.

36. The Applicant's dismissal of harm ignores the permanent industrialisation of the southern approach to Saxmundham. The experiential setting of the church, including its historic relationship with Hurts Hall and the Conservation Area, will remain compromised.
37. The Applicant's reliance on "negligible impact" misapplies policy. EN-1 para 5.9.27 and NPPF para 213 require that great weight be given to the conservation of heritage assets, even where harm is less than substantial. The Applicant provides no clear and convincing justification for siting the converter station in this sensitive location.
38. SEAS and independent expert evidence conclude that the proposed development will result in a moderate adverse impact on the church's setting. This arises from:
- a) Loss of tranquillity and rural character.
 - b) Introduction of large-scale industrial structures into valued approach views.
 - c) Foreground intrusion of the River Fromus bridge.
 - d) Permanent degradation of the experiential setting in conjunction with Hurts Hall and the Conservation Area.
39. In conclusion, the Church of St John the Baptist will suffer enduring harm to its setting. The Applicant's claim of negligible impact is misleading. The Examining Authority must attach great weight to the conservation of this Grade II* listed landmark and recognise that the proposed development results in moderate adverse harm that is not justified by the evidence presented.

Saxmundham Conservation Area

40. The Applicant acknowledges a moderate adverse effect at Year 1 but again relies on speculative Year 15 planting to claim that harm will reduce to "small" and therefore not significant.
41. This reliance on future planting is inadequate. Even after 15 years of tree growth, the harm will persist. The converter station's 26-metre height ensures that its bulk will remain visible above or through planting, particularly in winter months. The industrial massing will continue to intrude upon the rural character of the Conservation Area's southern approach, degrading the sense of arrival into the historic townscape.
42. Tree growth cannot disguise the permanent transformation of the Conservation Area's setting from rural parkland and agricultural landscape to an industrialised skyline.
43. The NPPF defines setting as "the surroundings in which a heritage asset is experienced." Setting is dynamic and cannot be reduced to a single

viewpoint. The Applicant's attempt to separate "view" from "heritage value" misrepresents policy and guidance.

44. The southern approach to Saxmundham is characterised by an undeveloped, green, rural landscape that contrasts with the more urban, built-up character within the Conservation Area. This rural setting positively contributes to the overall significance of the Conservation Area by providing an attractive gateway and sense of arrival.
45. The Saxmundham Conservation Area Appraisal (2016) explicitly identifies the southern gateway as an important part of the Area's setting, enhanced by expansive undeveloped land. The Saxmundham Neighbourhood Plan (2022-2036) reinforces this, with Policies SAX10 and SAX12 requiring protection of important views and resisting development that adversely affects the landscape or character of those views.
46. The proposed converter station and River Fromus bridge will be experienced in numerous views when travelling along the B1121 or within The Layers. These are not incidental glimpses but part of the experiential setting of the Conservation Area, contributing to its significance and sense of arrival.
47. The Applicant's assessment fails to account for the cumulative and experiential nature of setting. The industrial massing of the converter station and engineered bridge will permanently alter the rural character of the southern gateway, degrading the Conservation Area's setting and diminishing its heritage value.
48. SEAS and independent expert evidence conclude that the proposed development will result in a moderate adverse impact on the setting of the Conservation Area.
49. *Appendix A* compounds this error by attempting to subsume the assessment of individual listed buildings into the wider Conservation Area, rather than treating each asset separately. This conflation materially understates harm. National policy and guidance require that each designated heritage asset be assessed individually, with great weight attached to its conservation. By reducing the Grade II Church of St John the Baptist to a component of the Conservation Area, the Applicant misapplies EN-1, NPPF, and Historic England GPA3, and fails to provide a clear and convincing justification for harm.

Grade II* listed Buxlow Manor (NHLE 1215749)

50. The Applicant argues that Buxlow Manor was correctly scoped out of full assessment in the ES, concluding that there is no likelihood of significant impacts due to distance (1.35km), intervening woodland, and local topography. They assert that any impact would be negligible and less than substantial at the lower end of the scale, outweighed by public benefits.

51. This conclusion is unsound. SEAS and independent expert evidence confirm that Buxlow Manor, despite partial screening, remains visible in certain views, particularly in winter months when deciduous vegetation is ineffective. The Dutch gables and roof of the building can be appreciated through surrounding trees, and the Manor is experienced within a flat, open agricultural landscape that positively contributes to its significance.
52. The Applicant disputes SEAS' evidence of archaeological trenching being visible from Buxlow Manor, claiming it related to a different development. In footnote 8 of *Appendix A*, the Applicant noted that the trenching was potentially for the LionLink Multi-Purpose Interconnector Scheme. SEAS agrees with this assumption: the trenching observed in February 2025 was for NGV LionLink, whose proposed converter station is intended to sit adjacent to Sea Link on the same Saxmundham site (Bay 2).
53. *Appendix A*'s dismissal of SEAS's evidence is factually wrong. The trenching observed in February 2025 was for NGV LionLink, not an unrelated development. This error demonstrates that *Appendix A* cannot be relied upon as an accurate evidential baseline. It also confirms the Applicant's own acknowledgement that LionLink will be co-located at Saxmundham, intensifying cumulative harm and requiring full assessment.
54. The Coordination Masterplan prepared by National Grid (APP- 363) confirms that Bay 2 is the preferred location for LionLink, and that shared access routes, compounds, and mitigation zones are planned. This demonstrates that the Saxmundham site is intended to host two converter stations in close proximity, intensifying visual harm and requiring full assessment.
55. The Applicant has made clear that there is an acknowledged intention by National Grid Group plc to co-locate both the Sea Link converter station and the LionLink converter station at the Saxmundham site. The Applicant has further confirmed that LionLink is proceeding to PEIR, Statutory Consultation stage (January 2026).
56. This co-location materially alters the assessment of impact on Buxlow Manor. Historic England guidance requires consideration of seasonal views and cumulative experiential setting. The presence of two converter stations, shared infrastructure, and expanded compounds will significantly degrade the Manor's rural setting.
57. The Applicant's reliance on screening ignores seasonal variation and experiential setting. Historic England guidance requires consideration of incidental and seasonal views, not only those deemed "key" by the developer. The ES baseline assessment failed to account for these variations, resulting in an incomplete evaluation of the Manor's setting.
58. SEAS and expert evidence conclude that the proposed development will result in a low to moderate adverse impact on Buxlow Manor's setting. This arises from:

- a) Seasonal visibility of the Manor in conjunction with the converter station.
 - b) Loss of open, undeveloped agricultural landscape that contributes to significance.
 - c) Introduction of a dominant industrial structure into a rural context with few other built intrusions.
 - d) Failure to account for cumulative impacts, including the acknowledged intention to co-locate Sea Link and LionLink at Saxmundham.
59. The Applicant's decision to scope out Buxlow Manor from full assessment is therefore procedurally flawed. A full cumulative heritage impact assessment is required, recognising the combined effect of Sea Link and LionLink on Buxlow Manor and the wider landscape.

Grade II listed Hill Farmhouse (NHLE 1231296)

60. The Applicant asserts that Hill Farmhouse is enclosed by woodland and boundary planting, such that views of the asset in its surrounds and views from the asset do not contribute to its significance. They conclude that the converter station will not be perceptible and therefore no change to setting or heritage value will occur.
61. This conclusion is unsound. SEAS and independent expert assessment confirm that Hill Farmhouse sits only 305m from the proposed Saxmundham Converter Station. While mature vegetation provides partial screening, there are clear views from within the site across open agricultural land to the north and north-east. These views form part of the farmhouse's historic functional setting and contribute positively to its significance.
62. Seasonal variation has been ignored. In winter months, when deciduous vegetation is ineffective, visibility of the converter station will increase. The Applicant's reliance on summer screening misrepresents the year-round experience of the asset.
63. Viewpoint CH3 (Application Document 6.4.2.3 ES Figures [APP-230]) and Viewpoint 5 (Application Document 6.4.2.1 ES Figures [APP-209]) both demonstrate intervisibility between Hill Farmhouse and the proposed converter station. In Viewpoint 5, the farmhouse is visible to the west in conjunction with the converter station, confirming that the two will be experienced together in the landscape.
64. The Applicant dismisses these views as "not key" or "not important." This is contrary to Historic England guidance, which requires consideration of all experiential settings, including incidental and seasonal views, not only those deemed "key" by the developer.
65. *Appendix A's* reliance on dismissing incidental or seasonal views is procedurally flawed. Historic England guidance requires consideration of all

experiential settings, not only those deemed “key” by the developer. By excluding clear intervisibility between Hill Farmhouse and the converter station, the Applicant materially understates harm and fails to comply with national policy requirements.

66. The construction of the converter station will introduce a large-scale, industrial structure into an otherwise open and undeveloped agricultural setting. This will dominate the northern outlook from Hill Farmhouse and permanently alter its rural context.
67. The Applicant’s baseline assessment (APP-109) fails to account for:
- a) Views from within the farmhouse site towards the north and north-east.
 - b) The potential for the farmhouse to be seen in conjunction with the converter station.
 - c) Seasonal changes and increased winter visibility.
 - d) The contribution of agricultural land to the farmhouse’s historic functional setting.
68. Contrary to the Applicant’s claim of “no effect,” SEAS and expert evidence conclude that the converter station will result in a low to moderate adverse impact on the setting of Hill Farmhouse. This impact arises from the introduction of a dominant industrial structure into its rural agricultural context, visible in conjunction with the farmhouse, and degrading the experiential qualities of its setting.
69. The Applicant’s assertion that no objections were raised by Historic England or East Suffolk Council does not negate the evidence of harm. The Examining Authority must attach great weight to the conservation of designated heritage assets under EN-1 para 5.9.27 and NPPF para 213, even where harm is less than substantial.

Grade II listed Sternfield House (NHLE 1231300) and Grade II* Church of St Mary Magdalene (NHLE 1278252)

70. The Applicant argues that both Sternfield House and the Church of St Mary Magdalene were correctly scoped out of full assessment in the ES, concluding that there is only low potential for significant impacts due to their enclosed settings, mature woodland screening, and distance from the Saxmundham Converter Station. They assert that any impact would be negligible or minor adverse, less than substantial at the lower end of the scale and outweighed by public benefits.
71. This conclusion is unsound. SEAS and independent expert evidence confirm that while both assets are located in a secluded position, set back from the road and enclosed by mature trees, there are clear views towards the woodland to the north and north-east from the churchyard, and from the upper floors of Sternfield House. These views extend towards the site of the

proposed converter station, particularly during winter months when deciduous vegetation is ineffective.

72. The Applicant's reliance on screening ignores seasonal variation and experiential setting. Historic England guidance requires consideration of incidental and seasonal views, not only those deemed "key" by the developer. The ES baseline assessment failed to account for these variations, resulting in an incomplete evaluation of the assets' settings.
73. *Appendix A* compounds this error by scoping both assets out of full assessment altogether. This is procedurally flawed. National policy requires that each designated heritage asset be assessed individually, with great weight attached to its conservation. By excluding Sternfield House and the Church of St Mary Magdalene from detailed evaluation, the Applicant materially understates harm and fails to comply with EN-1, NPPF, and Historic England GPA3 guidance.
74. The undeveloped, green, and distinctly rural setting of Sternfield House and the Church of St Mary Magdalene positively contributes to their significance. Visibility of the proposed converter station within this landscape setting would introduce an incongruous industrial feature, alien to the historic and rural character of the settlement.
75. SEAS expert assessment concludes that the construction of the converter station will result in a low to moderate adverse impact on both assets. This arises from:
 - a) Seasonal visibility of the converter station in conjunction with the church and Sternfield House.
 - b) Loss of undeveloped rural character that defines the settlement's historic core.
 - c) Introduction of a dominant industrial structure into a landscape otherwise characterised by historic woodland and agricultural context.
76. The Applicant's assertion that harm is negligible misapplies policy. EN-1 para 5.9.27 and NPPF para 213 require that great weight be given to the conservation of heritage assets, even where harm is less than substantial. The Applicant provides no clear and convincing justification for siting the converter station in this sensitive location.
77. In conclusion, Sternfield House and the Church of St Mary Magdalene will suffer enduring harm to their settings. The Applicant's claim of negligible or minor adverse impact is misleading. The Examining Authority must attach great weight to the conservation of these assets and recognise that the proposed development results in low to moderate adverse harm that is not justified by the evidence presented.

Proposed River Fromus Bridge

78. The Applicant treats the bridge as a minor intrusion.
79. In reality, it is a major unassessed impact: 6m high, intrusive, altering valley form, removing woodland and increasing noise, fragmenting historic landscape patterns.
80. Substantial heritage setting impacts are ignored.
81. *Appendix A* fails to integrate the River Fromus bridge into the heritage assessment, treating it as ancillary infrastructure rather than a major built structure. This misapplies the Rochdale Envelope and withholds key design details, preventing proper evaluation of impacts. The omission is a significant evidential flaw that undermines the reliability of *Appendix A* as a basis for determining heritage effects.
82. The bridge will permanently alter the character of the River Fromus valley, which currently retains a tranquil, undeveloped quality. This valley forms part of the historic setting of Hurts Hall, the Church of St John the Baptist, and Saxmundham Conservation Area, all of which are experienced in conjunction with the river corridor.
83. The Applicant has failed to provide photomontages or AVR3-standard visualisations of the bridge. Its scale and engineered form will be highly visible in foreground views from the B1121 and The Layers, yet no adequate visual evidence has been submitted.
84. The bridge introduces a new movement corridor into the valley. Increased vehicular traffic, lighting, and noise will erode the tranquillity and rural character of the landscape, contrary to EN-1 para 5.9.23 which requires consideration of the contribution of setting to heritage significance.
85. The bridge will sever historic landscape patterns, remove mature woodland and alter the valley's ecological and cultural continuity. This fragmentation undermines the experiential setting of heritage assets and conflicts with the Saxmundham Neighbourhood Plan (Policies SAX10 and SAX12), which require protection of valued views and rural gateways.
86. The Applicant's assessment treats the bridge as ancillary infrastructure, yet its impact is equivalent to a major built structure. By failing to integrate the bridge into the heritage assessment, the Applicant has misapplied the Rochdale Envelope, withheld key design details and prevented proper evaluation of impacts.
87. The cumulative impact of the bridge, access road in conjunction with the converter station is particularly harmful. Together, they industrialise both the foreground and skyline of approach views, permanently degrading the sense of arrival into Saxmundham and the setting of multiple designated assets.

88. SEAS and independent expert evidence conclude that the River Fromus bridge represents a moderate to major adverse impact on heritage settings. The Applicant's claim of minor intrusion is misleading. The Examining Authority must recognise the bridge as a substantial, unassessed component of the project, requiring full evaluation and weight in the heritage balance.

Cumulative Harm

89. The Applicant treats each asset in isolation, ignoring the cumulative degradation of the heritage landscape.

90. SEAS HIA shows that Hurts Hall, the Church of St John the Baptist, and the Saxmundham Conservation Area are experienced together in gateway views, and that additional assets (Buxlow Manor, Hill Farmhouse, Sternfield House, and the Church of St Mary Magdalene) compound the harm.

91. The Applicant's *Appendix A* response fails to acknowledge the co-location of Sea Link and LionLink at the Saxmundham site. National Grid Group plc has made clear its intention to site both converter stations, with shared access routes, compounds, and mitigation zones.

92. *Appendix A's* omission of foreseeable co-located infrastructure is a significant evidential flaw. By treating Sea Link in isolation and excluding LionLink, despite clear evidence of shared siting and infrastructure, the Applicant has misapplied the Rochdale Envelope. This prevents proper evaluation of cumulative impacts and materially undermines the reliability of *Appendix A* as a basis for heritage assessment.

93. The Coordination Masterplan confirms Bay 2 as the preferred location for LionLink, and that shared infrastructure will be developed. This materially intensifies visual harm, landscape industrialisation, and cumulative setting degradation.

94. The Applicant has acknowledged that LionLink is proceeding to PEIR, Statutory Consultation stage (January 2026). This means the Examining Authority must consider the foreseeable cumulative impacts of both projects together, rather than treating them as isolated schemes.

95. Even if individual impacts are categorised as "less than substantial," the combined effect of two converter stations and associated infrastructure constitutes a pattern of setting degradation across multiple designated assets.

96. The cumulative harm is not limited to visual intrusion. It includes:

- a) Loss of rural character of the Fromus Valley and Saxmundham's southern gateway.
- b) Permanent industrialisation of historic parkland associated with Hurts Hall.

- c) Degradation of experiential setting where multiple assets are perceived together.
 - d) Policy conflict with EN-1 para 5.9.36 and NPPF para 213, which require cumulative impacts to be assessed and avoided.
97. The Applicant's failure to provide a full cumulative heritage impact assessment, including LionLink, is a fundamental flaw. By scoping out foreseeable co-located infrastructure, the Applicant has misapplied the Rochdale Envelope, withholding key design details and preventing proper evaluation of impacts.
98. *Appendix A* compounds this flaw by presenting asset-by-asset conclusions without recognising the combined experiential setting in which multiple assets are perceived together. This segmented approach materially understates harm. National policy requires cumulative assessment, and the Applicant's failure to provide it renders *Appendix A* procedurally and substantively defective.
99. The Examining Authority must recognise that cumulative harm is a statutory and policy requirement. EN-1 para 5.9.36 explicitly requires cumulative impacts to be assessed, and the NPPF attaches great weight to the conservation of heritage assets even where harm is less than substantial.
100. The Saxmundham Neighbourhood Plan (2023) reinforces this requirement, with Policies SAX10 and SAX12 mandating protection of gateway views and resisting development that adversely affects the landscape or character of those views. The co-location of Sea Link and LionLink directly conflicts with these policies.
101. SEAS submits that the Examining Authority must give great weight to this cumulative harm, recognising that the Saxmundham site is already planned as a multi-project hub, and that the combined heritage impacts are unjustified and unacceptable.
102. In conclusion, the Applicant's isolated asset-by-asset approach is procedurally and substantively flawed. The Examining Authority must require a full cumulative heritage impact assessment, including LionLink, and recognise that the combined effect of multiple converter stations, the River Fromus bridge, and associated infrastructure constitutes a moderate to major adverse impact across the heritage landscape.

Conclusion

103. *Appendix A* is incomplete, flawed, and inconsistent with EN-1, EN-5, GPA3, and the Horlock Rules. It significantly underestimates heritage impacts and does not demonstrate that harm is unavoidable or justified.

104. The Applicant's reliance on speculative Year 15 planting and screening is inadequate. The converter station's 26-metre height ensures that harm to Hurts Hall, the Church of St John the Baptist, and Saxmundham Conservation Area will persist even after mitigation. Screening cannot disguise permanent industrialisation of a heritage-sensitive valley.
105. The River Formus bridge represents a major unassessed impact, introducing a dominant engineered structure into a tranquil historic landscape. Its scale, noise, lighting, and fragmentation of valley form have not been properly assessed.
106. The Applicant has failed to comply with statutory and policy requirements:
- a) EN-1 requires clear and convincing justification for harm, which is absent.
 - b) EN-5 and the Horlock Rules require avoidance of high-amenity landscapes and heritage-sensitive siting, which has not been demonstrated.
 - c) The Schedule 9 duty to preserve natural beauty and historic interest has not been fulfilled.
 - d) The Rochdale Envelope has been misused, withholding key design details and preventing proper evaluation of impacts.
107. Cumulative impacts have been ignored. National Grid has acknowledged the intention to co-locate Sea Link and LionLink at Saxmundham (Bay 2), with shared access, compounds, and mitigation zones. LionLink is proceeding to PEIR stage. The combined effect of multiple converter stations, Friston Substation, Sizewell C, and associated works constitutes a pattern of setting degradation across multiple designated assets. EN-1 para 5.9.36 requires cumulative impacts to be assessed; *Appendix A* fails to do so.
108. The Applicant's heritage balance test is not lawfully applied. Harm is understated, alternatives are ignored, cumulative effects are excluded, and the public benefit case is generic and not linked to this location.
109. The revised LVIA visualisations submitted as REP1-109 (9.14: Suffolk and Kent Illustrative Visualisations) and REP1-121 (9.48: River Fromus Visualisations) remain inadequate. The images (REP1-296 to REP1-300) are not AVR3-standard, exclude construction and landscaping details, and present an imbalance between speculative Year 15 renderings and incomplete Year 1 depictions. These deficiencies confirm that the Applicant has not provided reliable visual evidence to support its heritage conclusions.
110. In light of these failures, the Examining Authority should give *Appendix A* little weight. The Applicant has not provided a lawful or policy-compliant foundation for granting consent.

111. Development consent should not be granted unless the project is re-sited or fundamentally redesigned to avoid demonstrable heritage harm. The Examining Authority must attach great weight to the conservation of heritage assets, recognise the inadequacy of the Applicant's assessment, and conclude that the proposals as currently sited are unacceptable.
112. The Applicant's repeated reliance on speculative mitigation, incomplete visualisations, and isolated asset-by-asset analysis demonstrates a systemic failure to meet evidential standards. The cumulative and enduring harm to Saxmundham's gateway, the Fromus Valley, and multiple designated assets cannot be outweighed by generic claims of public benefit.
113. Planning case law has established that the "setting" of a heritage asset is not confined to direct visibility. Historical, social, and experiential connections are sufficient to bring land within the setting of a designated asset. Judicial decisions have also made clear that harm categorised as "less than substantial" may nonetheless justify refusal of development consent. These principles apply directly to Hurts Hall, the Church of St John the Baptist, and the Saxmundham Conservation Area, all of which will suffer enduring harm from the converter station(s) and River Fromus bridge. The co-location of Sea Link and LionLink exacerbates cumulative harm, severing the last links between assets and their historic landscape setting. The Examining Authority must therefore recognise that the Applicant's narrow, visibility-only approach in Appendix A is legally flawed, and that cumulative harms across multiple assets are sufficient to prevent consent.
114. SEAS therefore submits that the only lawful and policy-compliant course is refusal of consent in the current location. A full cumulative heritage impact assessment, including LionLink, must be undertaken before any reconsideration of siting or design.

SEAS Fig 1:

View taken November 2025, northeast from the B1121 towards the church which demonstrate views are open and not limited to where gaps exist in the boundary planting of the church.



SEAS Fig 2:

View taken November 2025, northeast towards the church from the area of the proposed permanent access where it joins the B1121, demonstrating views of the church.



Appendix A Cultural Heritage - Heritage Impact Assessment

A.1 Summary

- A.1.1 A Relevant Representation was received from Suffolk Energy Action Solutions (SEAS) that contained a Cultural Heritage Impact Assessment written by David Edleston, Conservation Architect & Historic Built Environment Consultant. This provided an assessment of the impact of the Proposed Project through changes to setting on designated heritage assets in the vicinity of Saxmundham Converter Station and the Fromus Crossing.
- A.1.2 The Relevant Representation concluded that a greater number of heritage assets would be affected by the Proposed Project than has been identified in the submitted DCO application documents and that the cumulative effect of negative impacts to heritage assets should be given great weight in determining the application.
- A.1.3 This document is the Applicant's response to the content and conclusions of the Cultural Heritage Impact Assessment included in the Relevant Representation from SEAS. It provides information on the assessment undertaken by the Applicant in preparing the DCO documents and sets out the Applicant's conclusions on the impact to these assets. The Applicant considers that the cultural heritage assessment of impact through changes to setting in the submitted DCO documents represents a level of assessment that is appropriate and proportionate to the level of likely significant effects.

A.2 Introduction

- A.2.1 A Relevant Representation was received from Suffolk Energy Action Solutions (SEAS) that contained a Heritage Impact Assessment written by David Edleston, Conservation Architect & Historic Built Environment Consultant. This provided an assessment of the impact of the Proposed Project through changes to setting on designated heritage assets in the vicinity of Saxmundham Converter Station and the Fromus Crossing.
- A.2.2 This document sets out the Applicant's response to the content and conclusions of the Heritage Impact Assessment contained in the Relevant Representation from SEAS. It provides information on the assessment undertaken for each of the assets identified in the Relevant Representation.

A.3 Heritage Assets Under Consideration

- A.3.1 The Relevant Representation concludes that the Proposed Project has the potential to result in impacts on the following heritage assets through change to their settings and proceeds to provide an assessment of the impact of the Proposed Project on those assets:
- Grade II listed Hurts Hall, Saxmundham;
 - Grade II* listed Church of St John the Baptist, Saxmundham;
 - Saxmundham Conservation Area;
 - Grade II* listed Buxlow Manor, Knodishall Green;
 - Grade II listed Hill Farmhouse, Sternfield;
 - Grade II listed Sternfield House, Sternfield; and
 - Grade II* listed Church of St Mary Magdalene, Sternfield
- A.3.2 These assets will be discussed in turn in the following sections, outlining the conclusions of the Relevant Representation regarding the source of impact, degree of

effect, and level of harm to the asset, as well as the Applicant's assessment of the impact to those assets. More detail is provided to assets where the Relevant Representation argues that the Applicant's DCO Documentation is inadequate or erroneous. Points of broad agreement between the Heritage Impact Assessment and the submitted DCO documents are summarised at high level. Applicant's Response

Grade II listed Hurts Hall (NHLE 1268178)

- A.3.3 The Heritage Impact Assessment submitted with the Relevant Representation concluded that the Proposed Project would result in an impact to Hurts Hall through change to its setting. The assessment of impact broadly accords with that provided in the submitted DCO documentation with Paragraph 6.5 of the Heritage Impact Assessment and Paragraphs 3.9.105 - 3.9.116 of **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** concluding that the Proposed Project would result in a moderate adverse effect at Year 1 of operation, which is significant.
- A.3.4 **Table 3.13** of **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** then assesses the effect at Year 15 of Operation when planting/screening to limit views of the Converter Station and Fromus Crossing has matured. This was reported to reduce the level of effect to minor adverse which is not significant. Heritage Impact Assessment submitted with the Relevant Representation did not include an assessment of the effect at Year 15 of operation.
- A.3.5 Paragraph 6.6 of the Heritage Impact Assessment submitted with the Relevant Representation and Paragraphs 7.5.32 and 7.5.33 of **Application Document 7.1 (C) Planning Statement [AS-057]** agree that the impact would result in less than substantial harm to the asset at the lower end of the scale. Paragraph 7.5.7 of **Application Document 7.1 (C) Planning Statement [AS-057]** acknowledges the 'great weight' that should be afforded to the conservation of heritage assets in the decision making process, and Paragraph 7.5.56 of **Application Document 7.1 (C) Planning Statement [AS-057]** determines that the less than substantial harm at the lower end of the scale assessed at Hurts Hall and other heritage assets, is outweighed by the substantial public benefits of the Proposed Project.

Grade II* Church of St John the Baptist (NHLE 1268184)

- A.3.6 The Heritage Impact Assessment submitted with the Relevant Representation highlights that the assessment of the impact of the Proposed Project upon the Church of St John the Baptist in the Applicant's submitted DCO documentation is contained within the assessment of the Saxmundham Conservation Area, rather than the asset being assessed separately. It is the Applicant's view that this is a valid method of assessment given the location of the Church within the Saxmundham Conservation Area and their group value and shared setting to the south towards Hurts Hall and the Proposed Project location. The effect of the Proposed Project reported in Paragraphs 3.9.101 – 3.9.104 of **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** also encompassed the effect on the Church of St John the Baptist, hence this asset being named and discussed separately within the overarching assessment of the conservation area, and hence the conservation area being assessed as an asset of High value (sensitivity) to account for the presence of the Church of St John the Baptist, an asset of High value. For clarity, however, the paragraphs below present the Applicant's assessment of this asset to supplement information provided in the DCO documents, in response to the Relevant Representation. Further information is provided

in **Application Document 9.44 St John's Church Grade II* Listed Building Assessment [REP1-118]**.

- A.3.7 The Grade II* listed Church of St John the Baptist (NHLE1268184) is the parish church for Saxmundham. The earliest fabric in the church is the south chapel at the south end of the south aisle. It dates to 1308 and was constructed for Robert Swan. The west tower also dates from the 14th century. The remainder is largely 15th century, but it is much altered externally by restorations in the mid- and late-19th century, by architects Henry Roberts and RM Phipson respectively. The church is constructed in flint and conglomerate with ashlar detailing. It comprises a three-stage west tower, nave with north and south aisles and north vestry, chancel south chapel and south porch. Internally, the church retains its 15th century timber hammerbeam roof supported on moulded wall posts resting on corbels in the form of singing angels, and a 15th century font and piscina. Memorials inside the church mainly date to the 19th century and include a number belonging to members of the Long family of the nearby Grade II listed Hurts Hall (NHLE1268178). It has architectural and historic interest as an example of a medieval rural parish church and archaeological interest in its phases of development. Artistic interest is provided in the craftsmanship of its 15th century nave roof, font and piscina and in the quality of its internal 19th century memorials. It is of High heritage value.
- A.3.8 The church is located in a slightly elevated position on the eastern side of the settlement of Saxmundham, with the land falling away to the River Fromus to the west and rising to the east. It is set within a roughly oval-shaped grassed churchyard with upstanding grave memorials and mature trees throughout and along the boundary (see **Plate 1.35** and Photograph 1 in **Annex A of Application Document 6.3.2.3.C ES Appendix 2.3.C Site Photos [APP-111]**). The extent of the churchyard has not altered from its appearance on late 19th century OS maps, although the boundary to the east is now more open. To the north, the churchyard is bordered by the B1119 (Church Lane) with the boundary formed by a metal estate railing with one surviving stone gate pier, although this is substantially overgrown with trees and hedgerow. Views of the church from within the settlement of Saxmundham are extremely limited by the mature vegetation on the boundary of the churchyard, as well as buildings within the settlement. The trees are deciduous so more open views of the church are available in the winter. To the south the boundary of the churchyard is also formed by mature trees, however distant views of the church tower are still achievable from some locations on approach to the settlement from the south on the B1121 in areas where the tall hedge that flanks the B1121 has been removed (Photograph 2 in **Annex A of Application Document 6.3.2.3.C ES Appendix 2.3.C Site Photos [APP-111]**). These views from the B1121 showcase the tower in areas where the dense bank of trees around the church are broken, however, woodland as well the undulating topography does limit views from the B1121 (Photograph 3 in **Annex A of Application Document 6.3.2.3.C ES Appendix 2.3.C Site Photos [APP-111]**). There is also a track providing one of two accesses to Hurts Hall from the north that runs immediately to the west of the churchyard, the other access leading from a lodge to the northwest within the settlement. The track between the church and the hall provides a physical and visual setting relationship between the church and the hall that augments the relationship already established through the surviving monuments to the Long family within the church. The access formerly formed part of the parkland associated with the hall and part of its formal approach. Views of the church when travelling north from the hall would have formed part of this landscape design and therefore part of the later post-medieval setting of the church. Although these views are now limited, they are still available from the northern end of the formal access (Photograph 4 in **Annex A of Application Document 6.3.2.3.C ES Appendix**

2.3.C Site Photos [APP-111]), where the church tower appears set within a dense backdrop of mature trees, however some intervening buildings have been added along the track, diminishing understanding of this design intention (see **Plate 1.36** and **Plate 1.37** of **Application Document 6.3.2.3.C ES Appendix 2.3.C Site Photos [APP-111]**, and Photograph 5 in **Annex A**). Elements of the setting that contribute to the heritage value of the asset comprise its place within the wider settlement and parish of Saxmundham, its churchyard with its memorials, and the functional and visual setting relationship between it and Hurts Hall and its relict parkland.

- A.3.9 The Proposed Project will feature in some wider views on the approach to Saxmundham from the south on the B1121 which feature the church tower against a dense bank of mature trees as described above, although these are limited due to topography as well as the high mature hedges that flank much of the B1121. This aspect of the setting of the church, providing a sense of arrival into the settlement and conservation area, would experience change, as the operational above ground components, including the Saxmundham Converter Station and the Fromus Crossing, would be perceptible in some approach views. Although these elements would be perceptible, they would not interrupt views towards the church, nor would the Saxmundham Converter Station compete with the tower or distract from the tower in views as it would not break the prevailing tree line in the area. Other elements of the identified setting of the asset, including the churchyard and the view travelling north between Hurts Hall and the church, would remain unchanged. The Proposed Project at Year 1 of operation is therefore assessed as having a negligible magnitude of impact on the Church of St John the Baptist. On an asset of High value, this would constitute a **minor adverse effect**, which is not significant.
- A.3.10 Additional mitigation measures detailed in **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348]**, superseded by **[AS-059]** will reduce the visual impacts of the infrastructure and reduce the level of visual change to the setting of the church. Once the planting/screening proposed to limit views of the Converter Station and River Fromus crossing has achieved its full height, the residual effect at year 15 of operation of the Suffolk Onshore Scheme, is assessed to be **neutral**, which is not significant.
- A.3.11 The Proposed Project would therefore result in a temporary level of harm to the heritage asset which is assessed as equated to ‘less than substantial harm’, at the lower end of the scale, of temporary duration. This would be of temporary duration whilst the proposed screening planting around the Fromus Crossing and the Saxmundham Converter Station matures. Once the additional screening planting has matured, by Year 15 of operation, the residual effect of the Proposed Project would result in no harm to the heritage value of the asset.
- A.3.12 The Heritage Impact Assessment submitted with the Relevant Representation concludes that the degree of impact to the Church of St John the Baptist is moderate adverse although the Heritage Impact Assessment does not define these terms or the method that would be used to arrive at a significance of effect. This level of impact differs from the conclusion of the Applicant’s assessment presented above, but accords with the broader assessment made in Paragraphs 3.9.101 – 3.9.104 of **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** of this asset within Saxmundham Conservation Area. Regardless of this difference of opinion, Paragraph 6.6 of the Heritage Impact Assessment submitted with the Relevant Representation agrees with Paragraph D.3.6 of **Application Document 7.1 (C)**

Planning Statement [AS-057] that the impact would result in less than substantial harm to the asset at the lower end of the scale⁶.

- A.3.13 Paragraph 7.5.7 of **Application Document 7.1 (C) Planning Statement [AS-057]** acknowledges the 'great weight' that should be afforded to the conservation of heritage assets in the decision making process. Paragraph 7.5.56 of **Application Document 7.1 (C) Planning Statement [AS-057]** determines that the less than substantial harm at the lower end of the scale, assessed at designated assets identified in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]**, is outweighed by the substantial public benefits of the Proposed Project.

Saxmundham Conservation Area

- A.3.14 The Heritage Impact Assessment submitted with the Relevant Representation concluded that the Proposed Project would result in an impact to Saxmundham Conservation Area through a change to its setting. The assessment of impact broadly accords with that provided in the submitted DCO documentation with Paragraph 6.5 of the Heritage Impact Assessment and Paragraphs 3.9.101 - 3.9.104 of **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** concluding that the Proposed Project would result in a moderate adverse effect at Year 1 of operation, which is significant.
- A.3.15 **Table 3.13** of **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** then assesses the effect at Year 15 of Operation when planting / screening to limit views of the Converter Station and Fromus Crossing has matured. This was reported to reduce the level of effect to minor adverse which is not significant. Heritage Impact Assessment submitted with the Relevant Representation did not include an assessment of the effect at Year 15 of operation.
- A.3.16 Paragraph 6.6 of the Heritage Impact Assessment submitted with the Relevant Representation and Paragraph D.3.6 of **Application Document 7.1 (C) Planning Statement [AS-057]** agree that the impact would result in less than substantial harm to the asset at the lower end of the scale⁷.
- A.3.17 Paragraph 7.5.7 of **Application Document 7.1 (C) Planning Statement [AS-057]** acknowledges the 'great weight' that should be afforded to the conservation of heritage assets in the decision making process. Paragraph 7.5.56 of **Application Document 7.1 (C) Planning Statement [AS-057]** determines that the less than substantial harm at the lower end of the scale, assessed at designated assets, is outweighed by the substantial public benefits of the Proposed Project.

Grade II* listed Buxlow Manor (NHLE 1215749)

- A.3.18 Paragraph 5.23 of the Heritage Impact Assessment submitted with the Relevant Representation argues that the grade II* listed Buxlow Manor (NHLE 1215749) was incorrectly scoped out of full assessment in the ES and Paragraph 6.5 concludes that there would be a low to moderate adverse impact to the asset.

⁶ The asset is not specifically named in the AS-057 Planning Statement as its assessed level of impact did not meet the criteria outlined in Paragraphs D.3.4 and D.3.5 of AS-057 Planning Statement for detailed commentary, however the assessment of harm to the asset is covered under Paragraph D.3.6.

⁷ The asset is not specifically named in the AS-057 Planning Statement as its assessed level of impact did not meet the criteria outlined in Paragraphs D.3.4 and D.3.5 of AS-057 Planning Statement for detailed commentary, however the assessment of harm to the asset is covered under Paragraph D.3.6.

- A.3.19 The assessment of Buxlow Manor was carried out in Paragraphs 6.1.50 - 6.1.52 of **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]**. This concluded that there would be no potential for significant impacts to the asset as a result of the Proposed Project due primarily to the degree of existing screening planting around the asset, the existing woodland at Meadow Link Farm between the asset and the Converter Station, and the sloping local topography and distance between the asset and the Converter Station. Consultation regarding this asset was carried out with Historic England and East Suffolk Council in January – March 2024 in the process of agreeing required viewpoint locations and visualisations to demonstrate potential effects of the Proposed Project on heritage assets. No viewpoints or visualisations were required for this asset and there have been no concerns or objections raised by Historic England or East Suffolk Council in their submitted Relevant Representations regarding the assessment provided for this asset, or the decision taken to scope it out of full assessment in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]**. The Applicant considers that the cultural heritage assessment of impact through changes to setting in relation to Buxlow Manor therefore represents an appropriate level of assessment that is relevant and proportionate to the level of likely significant effects.
- A.3.20 Furthermore, Paragraph 5.23 of the Heritage Impact Assessment submitted with the Relevant Representation makes the claim that at the time of the site visit for the Heritage Impact Assessment on 17 February 2025 archaeological trial trenching was being undertaken at Saxmundham Converter Station site. It claims that this trenching was ‘clearly visible in views to the west from Buxhall Manor and in wider panoramic views along with views of the Manor, seen through the surrounding vegetation’. This was used to inform the assessment in the Heritage Impact Assessment that there would be clear visibility between the environs of Buxlow Manor and Saxmundham Converter Station and in views towards Buxlow Manor. This claim is disputed. There was no archaeological trial trenching being undertaken for Sea Link between 23 January 2025 and 3 March 2025. The trenching observed in February 2025 must therefore have been for a different development on a different site⁸. This suggests that the Relevant Representation has been based on a misunderstanding of the Proposed Project’s location and its visibility in relation to Buxlow Manor. The conclusion of the Heritage Impact Assessment was that the Proposed Project would result in a low to moderate adverse impact to the asset. Based on the above misunderstanding, a low adverse impact would be the most appropriate level to ascribe, although the Heritage Impact Assessment does not define these terms or the method that would be used to arrive at a significance of effect.
- A.3.21 This would broadly accord with the assessment of the asset in Paragraphs 6.1.50 - 6.1.52 of **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]** where it was determined that there is no likelihood of significant impacts to Buxlow Manor resulting from the Proposed Project, but it was not stated that there would be no impact. For clarity, the impact of the Proposed Project on Buxlow Manor is considered to be negligible, which on an asset of High value, results in an effect that is not significant, as expected.
- A.3.22 In the terms of Paragraph D.3.6 of **Application Document 7.1 (C) Planning Statement [AS-057]**, the impact would result in less than substantial harm to the asset at the lower

⁸ This was potentially trial trenching for Lion Link Multi-Purpose Interconnector scheme. The proposed converter station for that scheme is further north than the proposed Saxmundham Converter Station for the Suffolk Onshore Scheme and on higher ground. This has not, however, been confirmed by NGV.

end of the scale⁹. This agrees with Paragraph 6.6 of the Heritage Impact Assessment submitted with the Relevant Representation.

- A.3.23 Paragraph 7.5.7 of **Application Document 7.1 (C) Planning Statement [AS-057]** acknowledges the 'great weight' that should be afforded to the conservation of heritage assets in the decision making process. Paragraph 7.5.56 of **Application Document 7.1 (C) Planning Statement [AS-057]** determines that the less than substantial harm at the lower end of the scale, assessed at designated assets, is outweighed by the substantial public benefits of the Proposed Project.

Grade II listed Hill Farmhouse (NHLE 1231296)

- A.3.24 The Heritage Impact Assessment submitted with the Relevant Representation concluded that the Proposed Project would result in an impact to the grade II listed Hill Farmhouse through change to its setting. Paragraphs 5.26 – 5.28 of the Heritage Impact Assessment argue that views of the asset in its surrounds and views from the asset make a greater contribution to significance than is recognised in **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]**. This is disputed. The assessment presented in Paragraph 3.9.117 of **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]** and the baseline significance and setting assessment presented in Paragraphs 6.1.35-6.1.38 of **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]** include robust consideration of the degree to which the surrounding agricultural landscape contributes to the significance of the asset and the degree to which it is sensitive to visual intrusion resulting from the Proposed Project. It highlights the enclosed nature of the asset's setting, being largely screened from view due the boundary planting in its immediate curtilage. Views of the asset in the surrounding landscape are not a feature of its setting that contributes to significance. A visualisation of the Proposed Project is provided as Viewpoint CH3 in **Application Document 6.4.2.3 ES Figures Suffolk Cultural Heritage Part 2 of 2 [APP-230]** taken from the south of the asset looking north towards the proposed Saxmundham Converter Station. This demonstrates both the asset's lack of visibility and the lack of visibility of the Proposed Project which would sit behind it in the view.
- A.3.25 The Heritage Impact Assessment submitted with the Relevant Representation also makes reference to Viewpoint 5 in **Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209]** prepared for the Landscape and Visual Impact Assessment as being of relevance to the assessment of the impact of the Proposed Project on this asset. However, it is the Applicant's view that this viewpoint further demonstrates the lack of contribution that is currently made by visual setting to this asset. Hill Farmhouse is located in the far left of the view heavily screened by trees. Therefore, although the proposed Saxmundham Converter Station will feature prominently in this view, it is not a key view, or otherwise important view towards the asset where its heritage interests are conveyed and / or understood. The Applicant therefore reiterates the assessment that the Proposed Project will not result in any impact to the heritage value of this asset through change to its setting and no effect and no harm is identified.

⁹ The asset is not specifically named in the AS-057 Planning Statement as its assessed level of impact did not meet the criteria outlined in Paragraphs D.3.4 and D.3.5 of AS-057 Planning Statement for detailed commentary, however the assessment of harm to the asset is covered under Paragraph D.3.6.

- A.3.26 There have been no concerns or objections raised by Historic England or East Suffolk Council in their submitted Relevant Representations regarding the assessment provided for this asset.

Grade II listed Sternfield House (NHLE 1231300)

- A.3.27 Paragraphs 5.30 and 5.31 of the Heritage Impact Assessment submitted with the Relevant Representation argues that the grade II listed Sternfield House (NHLE 1215749) was incorrectly scoped out of full assessment in the ES and Paragraph 6.5 concludes that there would be a low to moderate adverse impact to the asset.
- A.3.28 The assessment of Sternfield House was carried out in Paragraphs 6.1.24 - 6.1.27 of **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]**. This concluded that there would be only low potential for significant impacts to the asset as a result of the Proposed Project due primarily to the enclosed nature of the asset's setting, the degree of existing screening provided by planting around the asset, and further woodland planting between it and the proposed Saxmundham Converter Station. Consultation regarding this asset was carried out with Historic England and East Suffolk Council in January – March 2024 in the process of agreeing required viewpoint locations and visualisations to demonstrate potential effects of the Proposed Project on heritage assets. No viewpoints or visualisations were requested for this asset and there have been no concerns or objections raised by Historic England or East Suffolk Council in their submitted Relevant Representations regarding the assessment provided for this asset, or the decision taken to scope it out of full assessment in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]**. The Applicant considers that the cultural heritage assessment of impact through changes to setting in relation to Sternfield House therefore represents an appropriate level of assessment that is relevant and proportionate to the level of likely significant effects.
- A.3.29 Paragraphs 6.1.24 - 6.1.27 of **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]** report a low likelihood of significant impacts to Sternfield House resulting from the Proposed Project, but it was not stated that there would be no impact. For clarity, the impact of the Proposed Project on Sternfield House is considered to be negligible, which on an asset of medium value, results in a negligible effect which is not significant.
- A.3.30 In the terms of Paragraph D.3.6 of **Application Document 7.1 (C) Planning Statement [AS-057]**, the impact would result in less than substantial harm to the asset at the lower end of the scale¹⁰. This agrees with Paragraph 6.6 of the Heritage Impact Assessment submitted with the Relevant Representation.
- A.3.31 Paragraph 7.5.7 of **Application Document 7.1 (C) Planning Statement [AS-057]** acknowledges the 'great weight' that should be afforded to the conservation of heritage assets in the decision making process. Paragraph 7.5.56 of **Application Document 7.1 (C) Planning Statement [AS-057]** determines that the less than substantial harm at the lower end of the scale, assessed at designated assets, is outweighed by the substantial public benefits of the Proposed Project.

Grade II* Church of St Mary Magdalene (NHLE 1278252)

¹⁰ The asset is not specifically named in the AS-057 Planning Statement as its assessed level of impact did not meet the criteria outlined in Paragraphs D.3.4 and D.3.5 of AS-057 Planning Statement for detailed commentary, however the assessment of harm to the asset is covered under Paragraph D.3.6.

- A.3.32 Paragraphs 5.30 and 5.31 of the Heritage Impact Assessment submitted with the Relevant Representation argues that the grade II* listed Church of St Mary Magdalene in Sternfield (NHLE 1278252) was incorrectly scoped out of full assessment in the ES and Paragraph 6.5 concludes that there would be a low to moderate adverse impact to the asset.
- A.3.33 The assessment of the Church of St Mary Magdalene was carried out in Paragraphs 6.1.24 - 6.1.27 of **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]**. This concluded that there would be only low potential for significant impacts to the asset as a result of the Proposed Project, due primarily to the degree of existing screening provided by planting around the asset, and further woodland planting between it and the Saxmundham Converter Station. Consultation regarding this asset was carried out with Historic England and East Suffolk Council in January – March 2024 in the process of agreeing required viewpoint locations and visualisations to demonstrate potential effects of the Proposed Project on heritage assets. No viewpoints or visualisations were requested for this asset and there have been no concerns or objections raised by Historic England or East Suffolk Council in their submitted Relevant Representations regarding the assessment provided for this asset, or the decision taken to scope it out of full assessment in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]**. The Applicant considers that the cultural heritage assessment of impact through changes to setting in relation to the Church of St Mary Magdalene in Sternfield therefore represents an appropriate level of assessment that is relevant and proportionate to the level of likely significant effects.
- A.3.34 Paragraphs 6.1.24 - 6.1.27 of **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]** report a low likelihood of significant impacts to the Church of St Mary Magdalene resulting from the Proposed Project, but it was not stated that there would be no impact. For clarity, the impact of the Proposed Project on the Church of St Mary Magdalene is considered to be negligible, which on an asset of high value, results in a minor adverse effect which is not significant.
- A.3.35 In the terms of Paragraph D.3.6 of **Application Document 7.1 (C) Planning Statement [AS-057]**, the impact would result in less than substantial harm to the asset at the lower end of the scale¹¹. This is in agreement with Paragraph 6.6 of the Heritage Impact Assessment submitted with the Relevant Representation.
- A.3.36 Paragraph 7.5.7 of **Application Document 7.1 (C) Planning Statement [AS-057]** acknowledges the ‘great weight’ that should be afforded to the conservation of heritage assets in the decision making process. Paragraph 7.5.56 of **Application Document 7.1 (C) Planning Statement [AS-057]** determines that the less than substantial harm at the lower end of the scale, assessed at designated assets, is outweighed by the substantial public benefits of the Proposed Project.

A.4 Summary and Conclusion

- A.4.1 The discussion in Section 2 provides a narrative regarding the points of agreement and disagreement between the Heritage Impact Assessment submitted with the Relevant Representation and the heritage aspects of the submitted DCO documentation. The

¹¹ The asset is not specifically named in the AS-057 Planning Statement as its assessed level of impact did not meet the criteria outlined in Paragraphs D.3.4 and D.3.5 of AS-057 Planning Statement for detailed commentary, however the assessment of harm to the asset is covered under Paragraph D.3.6.

assessed levels of impact, effect, and harm for each of the assets discussed is summarised in Table App1.1 in this section.

- A.4.2 The assessment methodologies used in the Heritage Impact Assessment and submitted DCO documents differ insofar as the impact assessment in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** has clear definitions of the magnitude of impact and significance of effect levels reported, and the assessment arrives at a conclusion on the significance of effect. The Heritage Impact Assessment submitted with the Relevant Representation does not define what is meant by the low to moderate levels of impact reported and does not report on a significance of effect. Comparison between the two assessments is somewhat hampered by this; however, Table App 1.1 summarises the conclusions of both assessments in an attempt to highlight areas of assumed broad agreement and areas of disagreement. Whilst the two reports appear to differ in their assessment of the level of impact and effect (at least if the ‘moderate impact’ is considered rather than the ‘low impact’), there is agreement almost across the board that the Proposed Project results in less than substantial harm at the lower end of the scale for most of the assets considered. The exception to this, and a point of disagreement, is the grade II listed Hill Farmhouse.
- A.4.3 The thrust of the Heritage Impact Assessment’s claim that the Applicant had not fully considered the impact and harm to the identified assets appears to have been based on the assumption that assets scoped out of full assessment in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** were not properly assessed as impacted by the Proposed Project and not taken into account in the balancing of the public benefits of the Proposed Project against the harm to heritage assets. As demonstrated in the sections above, this is not the case. Some assets were not specifically named in the **Application Document 7.1 (C) Planning Statement [AS-057]** due to their assessed level of impact not meeting the criteria outlined in Paragraphs D.3.4 and D.3.5 of **Application Document 7.1 (C) Planning Statement [AS-057]** for detailed commentary, however the assessment of harm to these assets is covered under Paragraph D.3.6. Paragraph 7.5.7 of **Application Document 7.1 (C) Planning Statement [AS-057]** acknowledges the ‘great weight’ that should be afforded to the conservation of heritage assets in the decision-making process. Paragraph 7.5.56 of **Application Document 7.1 (C) Planning Statement [AS-057]** determines that the less than substantial harm at the lower end of the scale, assessed at designated assets, is outweighed by the substantial public benefits of the Proposed Project.
- A.4.4 The Applicant considers that the cultural heritage assessment of impact through changes to setting presented here and in **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]**, **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** and **Application Document 7.1 (C) Planning Statement [AS-057]** is an appropriate level of assessment that is relevant and proportionate to the level of likely significant effects.

Table App 1.1 Summary of impact assessments to the identified assets

Asset	Assessment in RR	Applicant’s Assessment
Grade II Hurts Hall	Low to moderate impact	Moderate adverse effect at Year 1 of Operation
	No assessment reported	Minor Adverse effect at Year 15 of Operation

Asset	Assessment in RR	Applicant's Assessment
	Low level of less than substantial harm	Low level of less than substantial harm
Grade II* Church of St John the Baptist	Low to moderate impact	Minor adverse effect at Year 1 of Operation
	No assessment reported	No effect at Year 15 of Operation
	Low level of less than substantial harm	Low level of less than substantial harm
Saxmundham Conservation Area	Low to moderate impact	Moderate adverse effect at Year 1 of Operation
	No assessment reported	Minor adverse effect at Year 15 of Operation
	Low level of less than substantial harm	Low level of less than substantial harm
Grade II* Buxlow Manor	Low to moderate impact	Minor adverse effect
	Low level of less than substantial harm	Low level of less than substantial harm
Grade II Hill Farmhouse	Low to moderate impact	No effect
	Low level of less than substantial harm	No harm
Grade II Sternfield House	Low to moderate impact	Negligible adverse effect
	Low level of less than substantial harm	Low level of less than substantial harm
Grade II* Church of St Mary Magdalene	Low to moderate impact	Minor adverse effect
	Low level of less than substantial harm	Low level of less than substantial harm

A.5 Photographs



A View from the front of the church facing northwest along the main access towards Saxmundham and the B1119.



Figure A.1 View northeast from the B1121 towards the church demonstrating views limited to where gaps exist in the boundary planting of the church.



Figure A.2 View northeast towards the church from the area of the proposed permanent access where it joins the B1121, demonstrating no views of the church due to mature woodland.



Figure A.3 View from the main entrance of the church towards Hurts Hall, demonstrating screening from mature woodland as well as 20th century buildings on the south side of the church.



Figure A.4 Views from the northern end of the formal access to Hurts Hall towards the church, demonstrating screening from mature woodland, as well as 20th century buildings in the foreground.