

The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.125: Assessment of Cumulative Effects on the Wider Historic Landscape

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Executive Summary

- Ex1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) response to Issue Specific Hearing 2 (ISH2) Action Point 55 raised by the Examining Authority (ExA) which requested that the Applicant submits '*... a more thorough and detailed assessment of the cumulative impacts on settings of cultural heritage assets and the historic wider landscapes.*'
- Ex1.1.2 The first part of the request (i.e. the assessment of cumulative impacts on the setting of cultural heritage assets) was submitted at Deadline 4 (**Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]**).
- Ex1.1.3 The purpose of the document is set out at Section 1, and the document provides a summary of the cumulative assessment submitted with the DCO Application in March 2026 (Section 2). It then goes on to present summaries of the historic landscape character for the Suffolk Onshore Scheme and Kent Onshore Scheme and an assessment of the likely effects on historic landscape as a result of the Proposed Project (Section 3). Finally, it provides a detailed assessment of cumulative effects on the historic landscapes of the Suffolk Onshore Scheme and Kent Onshore Scheme in combination with other developments (Section 4).
- Ex1.1.4 The assessment took into consideration schemes considered as part of the original cumulative assessment and has concluded in Suffolk the cumulative effect from the Proposed Project in combination with the other developments would represent a medium impact and a **minor adverse effect**. This would be no greater than the effect assessed for the Proposed Project on its own, and as such, there would be no significant cumulative effect.
- Ex1.1.5 For Kent, the cumulative assessment has concluded that the effect of the Proposed Project in combination with the other developments would represent a small level of change. This would constitute a negligible effect which would be no greater than the effect assessed for the Proposed Project on its own. As such, there would be no significant cumulative effect.

1. Introduction

1.1 Purpose of this Document

- 1.1.1 This document provides the Applicant's response to Issue Specific Hearing 2 (ISH2) Action Point 55 raised by the Examining Authority (ExA) within **Action Points arising from Issue Specific Hearing 2 (ISH2) on environmental issues held on Wednesday 28 January to Friday 30 January 2026 [EV6-033]**. The Action Point 55 requested that the Applicant submits '*... a more thorough and detailed assessment of the cumulative impacts on settings of cultural heritage assets and the historic wider landscapes.*'
- 1.1.2 This document supplements the Applicant's response to Action Point 55 provided in **Application Document 9.90 Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]** and comprises further assessment of cumulative effects on wider historic landscapes and is submitted at Deadline 5 of the Examination.

1.2 Document Structure

- 1.2.1 This document consists of the following information and assessment sections:
- Section 1 sets out the purpose of the document;
 - Section 2 sets out a summary of the cumulative assessment submitted with the DCO Application in March 2026;
 - Section 3 presents summaries of the historic landscape character for the Suffolk Onshore Scheme and Kent Onshore Scheme and an assessment of the likely effects on historic landscape as a result of the Proposed Project; and
 - Section 4 sets out the detailed assessment of cumulative effects on the historic landscapes of the Suffolk Onshore Scheme and Kent Onshore Scheme in combination with other developments.

2. Summary of Cumulative Assessment Submitted with the DCO Application

- 2.1.1 The inter-project cumulative effects on heritage assets have been assessed and are submitted as **Application Document 6.2.2.13 Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** and **Application Document 6.2.3.13 Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]**.
- 2.1.2 The submitted assessments considered the potential cumulative effects on designated and non-designated heritage assets, including features that contributed to the historic landscape character, from the proposed Suffolk Onshore Scheme and Kent Onshore Scheme alongside other developments.
- 2.1.3 The submitted assessments concluded that the effects from other developments, in combination with the Proposed Project, and considering all additional mitigation measures, would not result in a significance of effect that was greater than that assessed for the Proposed Project individually. As such, no residual significant cumulative effect was identified.

3. Historic Landscape Character

3.1 Suffolk Onshore Scheme – Historic Landscape Character

- 3.1.1 The following description of the historic landscape builds upon the information provided in **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]**, supported by Figure 6.4.2.3.5 of **Application Document 6.4.2.3 ES Figures Suffolk Cultural Heritage Part 2 of 2 [APP-230]**.
- 3.1.2 A 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.
- 3.1.3 Historic Landscape Characterisation data provided by the Suffolk County Council Historic Environment Record (HER) show the coastal area as ‘Unimproved Land’ with most of the Order Limits from the Gorse Hill through to Hazelwood and the B1069 categorised as ‘18th Century and Later Enclosure’, and further sub-categorised as ‘Former Common Arable or Heathland’. The majority of land from Hazelwood/the B1069 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.
- 3.1.4 Both versions of the Historic Landscape Characterisation demonstrate that the landscape across the Suffolk Onshore Scheme Order Limits has been dominated by agriculture from at least the 19th century, with this land use continuing into the contemporary landscape.
- 3.1.5 The data does, however, also demonstrate that the majority of the landscape encompassed by the Suffolk Onshore Scheme Order Limits has been subject to major changes since the Second World War. Most distinctive is the largescale removal of field boundaries to form large fields defined as ‘*Post 1950 Agricultural Landscape*’, with the sub-category ‘*Boundary Loss From Irregular Co-axial Fields*’. This type of landscape character includes the land south of Saxmundham where the former parkland associated with Hurts Hall is located. The parkland, which extended to the area known as The Layers west of the B1121 (and therefore west of the Order Limits), is a good example of an area that has suffered from the largescale removal of field boundaries in the post-war period.
- 3.1.6 This change, a result of the post-war industrialisation of agriculture, is also mirrored in the later 20th century/early 21st century agricultural buildings which include largescale barns such as those noted at Hill Farm and Redhouse Farm between Friston and Sternfield, as well as reservoirs built to support agriculture such as that recorded at Hazlewood Farm.
- 3.1.7 This continuation of landscape change can also be seen to the north of Friston, where construction is underway for SPR’s EA1N/EA2. This development is being undertaken on land defined as ‘*Post 1950 Agricultural Landscape*’, with the sub-category ‘*Boundary*

Loss From Irregular Co-axial Fields', as well as *'Pre 18th-Century Enclosure'* sub-category *'Random Fields'*.

- 3.1.8 The key elements of the historic landscape within most of the Suffolk Onshore Scheme, including the Saxmundham Converter Station, Friston Substation and the proposed bridge over the River Fromus are therefore large open agricultural fields, most of which are arable, which have been formed through the removal of field boundaries in the second half of the 20th century.

3.2 Kent Onshore Scheme – Historic Landscape Character

- 3.2.1 As noted in **Application Document 6.3.3.3.A ES Appendix 3.3.A Cultural Heritage Baseline Report [APP-161]**, the Historic Landscape Characterisation data provided by Kent County Council shows the Study Area falling into three categories (as depicted on Figure 6.4.3.3.5 of **Application Document 6.4.3.3 ES Figures Kent Cultural Heritage Part 1 of 2 [APP-261]**). The elevated area of the Ebbsfleet Peninsula consists of 'Field Patterns Type 1.14: Fields Predominantly Bounded by Tracks, Roads, and Other Rights of Way'. To the south and west the Ebbsfleet Peninsula drops away to land defined as 'Reclaimed Marshland Type 5.4: Rectilinear Enclosures', while to the east the land is defined as 'Reclaimed Marshland Type 5.3: Small Rectilinear Enclosures'. The eastern end of the Order Limits, near the coastline, are categorised as 'Coastal Type 8.9: Dunes' and 'Coastal Type 8.7: Mud Flats', with other types within the Study Area limited to small pockets of 'Extractive and Other Industry Type 12.5: Reservoirs and Water Treatment' and 'Recreation Type 11.2: Golf Courses'.
- 3.2.2 The above ground works of the Kent Onshore Scheme are largely focused within HLC Types 'Field Patterns Type 1.14: Fields Predominantly Bounded by Tracks, Roads, and Other Rights of Way', and 'Reclaimed Marshland Type 5.4: Rectilinear Enclosures', with the Minster Converter Station and Substation (the permanent above ground infrastructure) located within 'Reclaimed Marshland Type 5.4: Rectilinear Enclosures'. This extensive HLC type extends along much of the north side of the River Stour as it runs west along the course of the former Wantsum Channel, and both the Minster Converter Station and Substation are located within the eastern limits of the HLC type. This eastern area is severed from the rest of the HLC type by the Deal Brach Line, a railway line that remains in operation. This eastern corner of the HLC type various and becomes more industrial on nature, with a mixture of water treatment works, power infrastructure, and commercial development visible. This is also evident in the HLC types that are interspersed with aforementioned Type 5.4, with two areas defined as '*Extractive and Other Industry Type 12.5: Reservoirs and Water Treatment*', and borders an area defined as '*Extractive and Other Industry Type 12.4: Modern Large-Scale Industry (Power Stations; Oil Terminals etc)*'.

4. Cumulative Developments

4.1.1 The following section sets out information relating to the developments considered in this assessment of cumulative effects.

4.2 Other Developments

4.2.1 The other developments that were assessed within **Application Document 6.2.2.13 Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** submitted with the DCO Application and that are therefore relevant to this additional cumulative assessment for the Suffolk Onshore Scheme are:

- East Anglia One and Two Offshore Windfarms;
- LionLink Offshore Interconnector¹; and
- South Saxmundham Garden Neighbourhood.

4.2.2 The developments that were assessed within **Application Document 6.2.3.13 Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]** and that are therefore relevant to the cumulative assessment of the Kent Onshore Scheme comprise:

- Richborough Energy Park and Richborough Energy Park BESS;
- Land Adjacent to Southern Wastewater Treatment Site; and
- Weatherlees Hill Wastewater Treatment Works.

4.3 Scope of This Cumulative Assessment

4.3.1 As assessed in **Application Document 6.2.2.13 Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** and **Application Document 6.2.3.13 Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]**, there would be no physical impact to individual components of the historic landscape that would result in significant change to its character. This is because mitigation proposals, secured in the DCO by **Application Document 7.5.7.1 (C) Landscape and Ecological Management Plan – Suffolk [REP4-065]**, and **Application Document 7.5.7.2 (C) Outline Landscape and Ecological Management Plan – Kent [REP4-067]** and **Application Document 7.5.7.2 Figure 1 Minster Converter Station and Substation Outline Landscape Mitigation [REP4-067]**, will reinstate landscape features, such as hedgerows, that may experience partial loss during construction. As such, the assessment scope of the potential cumulative effects on the historic landscape considers the magnitude of change arising from the physical presence of the Proposed Project' permanent above-ground infrastructure when experienced alongside the above-ground infrastructure of the other developments.

¹ Note. The assessment contained in Appendix C of **Applicant's Response to January Hearing Action Points (CAH1 and ISH2) - Deadline 5 - Appendices** submitted at Deadline 5 also confirms that there will be no change from the assessment submitted in the DCO application.

Overview of Permanent Above-Ground Infrastructure - Suffolk

- 4.3.2 The above ground infrastructure of the Suffolk Onshore Scheme comprises the Saxmundham Converter Station, Friston Substation and the proposed bridge over the River Fromus.
- 4.3.3 The Saxmundham Converter Station is located entirely within a landscape defined as '*Post 1950 Agricultural Landscape*', with the sub-category '*Boundary Loss From Irregular Co-axial Fields*'. Furthermore, the Converter Station is located within what is now a large single field, with historic mapping demonstrating that the field was formed through the removal of numerous field boundaries and a block of woodland (known as Great Wood) in the second half of the 20th century.
- 4.3.4 The Friston Substation site is largely located within HLC type '*Post 1950 Agricultural Landscape*', with the sub-category '*Boundary Loss From Irregular Co-axial Fields*', with the very western limits falling within '*Pre 18th-Century Enclosure*' sub-category '*Random Fields*'. While the substation site falls across two HLC types, it should be noted that the substation falls within a single field which, like the Saxmundham Converter Station site, has been formed as a result of the removal of field boundaries in the second half of the 20th century.
- 4.3.5 The onshore permanent aboveground infrastructure associated with the East Anglia One and Two Projects comprises two new substations north of Friston, but to the south of the proposed Friston Substation (also known as 'Kiln Lane Substation').
- 4.3.6 The onshore permanent aboveground infrastructure associated with the LionLink Project comprises a new Converter Station located immediately to the north of the Proposed Project's Saxmundham Converter Station, as well as an extension to the Kiln Lane Substation near Friston.
- 4.3.7 The infrastructure associated with South Saxmundham Garden Neighbourhood project, which is located on the south side of Saxmundham, comprises housing, employment provision (including roadside services), a community hub, and a primary school. Its positioning flanking the A12 and the railway line means that it will be separated from the western end of the Suffolk Onshore Scheme, and there will be limited potential for in-combination views of the permanent aboveground infrastructure associated with the Suffolk Onshore Scheme and the South Saxmundham Garden Village. Furthermore, the South Saxmundham Garden Village will occupy land classed as '*Pre-18th-Century Enclosure*' with the subcategory '*Random Fields*' rather than the '*Post 1950 Agricultural Landscape*', with the sub-category '*Boundary Loss From Irregular Co-axial Fields*' which dominates the landscape of the Suffolk Onshore Scheme where the Converter Station and Friston Substation would be located.

Overview of Permanent Above-Ground Infrastructure - Kent

- 4.3.8 The above ground infrastructure of the Kent Onshore Scheme comprises the Minster Converter Station and Substation, as well as a short section of Over-Head Line. Both the Converter Station and Substation, as well as four towers, are located within land defined as '*Reclaimed Marsh Type 5.4 Rectilinear Enclosures*'. Furthermore, the Minster Converter Station and Substation are both in the eastern limits of this HLC Type, with the Converter Station, Substation, and two towers separated from the rest of the larger area of this HLC type which is located west of the Branch Line running to Deal. Of the remaining Over-Head Line towers, two fall within HLC type '*Reclaimed Marsh Type 5.4 Rectilinear Enclosures*', but to the southwest of the Deal Branch Line, while

the remaining towers fall south of the River Stour in HLC type 'Reclaimed Marsh Type 5.3 Small Rectilinear Enclosures'.

- 4.3.9 The projects considered as relevant for the cumulative assessment are all located to the southeast of the Minster Converter Station and Substation.
- 4.3.10 Richborough Energy Park consists of the extension of a 400 kv substation on the north side of the River Stour. It is located on land that falls within HLC 'Reclaimed Marsh Type 5.4 Rectilinear Enclosures' but extend into 'Extractive and other industry Type 12.4: Modern large scale industry (power stations; oil terminals etc.), most of which was recently occupied by a wind turbine, and was formerly part of the former Richborough Port area and later a power station complex.
- 4.3.11 Richborough Energy Park BESS consists of a battery storage facility that has now been constructed. It is located on land that falls within HLC 'Reclaimed Marsh Type 5.4 Rectilinear Enclosures' but extend into 'Extractive and other industry Type 12.4: Modern large scale industry (power stations; oil terminals etc.), most of which was part of the former Richborough Port area and later a power station.
- 4.3.12 Land adjacent to Southern Wastewater Treatment Site consists of the installation of a grid stability facility consisting of synchronous compensators and associated electrical infrastructure, underground cabling, access tracks, drainage, and ancillary infrastructure. This scheme runs from a water treatment work to the north past a large solar farm, and into the Richborough Energy Park in the south, and crosses three HLC types. These are 'Reclaimed Marsh Type 5.4 Rectilinear Enclosures', 'Extractive and other industry Type 12.4: Modern large-scale industry (power stations; oil terminals etc.)', and Extractive and other industry type 12.5: Reservoirs and water treatment'.
- 4.3.13 Weatherlees Hill Wastewater Treatment consist of a solar photovoltaic array. This development falls within HLC area 'Reclaimed Marsh Type 5.4 Rectilinear Enclosures', but is immediately adjacent to HLC type 'Extractive and other industry type 12.5: Reservoirs and water treatment', and the existing water treatment works.
- 4.3.14 All four developments are located on the fringes of 'Reclaimed Marsh Type 5.4 Rectilinear Enclosures' in an area that has been used for industrial activities since at least the early 20th century when the Richborough Port complex was developed during the First World War. This land was subsequently used for a power station before being redeveloped for energy production and transmission with wind and solar power developing alongside a substation and water treatment works.
- 4.3.15 While the Minster Converter Station and Substation will add a new element to the landscape, it is partially separated from these other developments by the woodland and scrub in the Weatherlees Hill area.
- 4.3.16 Furthermore, the developments are all concentrated in the eastern end of the HLC type 'Reclaimed Marsh Type 5.4 Rectilinear Enclosures', which continues along the former Wantsum Channel for at least 10 km to the west.
- 4.3.17 As such, the Proposed Project will be focused in a section of HLC type Reclaimed Marsh Type 5.4 Rectilinear Enclosures' which is characterised by 20th century development and will not extend into the more rural landscape west of the Deal Branch Line.

5. Cumulative Effects

5.1 Cumulative Effects Assessment – Suffolk

- 5.1.1 The components of the historic landscape that retain the greatest legibility, in terms of time depth, are found in the settlement areas, such as within Saxmundham, where the conservation area designation has helped conserve or enhance its historical character. Other aspects of the landscape that possess a greater time depth include Hurts Hall and the Church of St. John the Baptist, as both are experienced within a domestic and functional landscape setting that has not experienced major change, and which also provide a buffer to the landscape changes beyond their grounds.
- 5.1.2 However, beyond these areas, and within the land required for the Suffolk Onshore Scheme, there is little legibility of historical landscape components. Archaeological evidence reveals that the landscape has been managed since the prehistoric period, but the legibility of prehistoric to medieval aspects of this land use is negligible. This is due to the level of change from post-medieval enclosure, settlement growth, the 20th century reorganisation of earlier field systems which has resulted in boundary loss, and the building of road, rail and power infrastructure. The landscape character of the land in which the Suffolk Onshore Scheme would be experienced is typical of post-medieval and modern agricultural landscapes in the region, and its sensitivity to change is assessed to be low.
- 5.1.3 The permanent above-ground components of the operational Suffolk Onshore Scheme would introduce large-scale electricity transmission infrastructure into a landscape character that is primarily agricultural. This would noticeably alter the landscape character and would therefore constitute a medium impact and a **minor adverse effect**.
- 5.1.4 The permanent infrastructure associated with the other developments, comprising a worst case scenario whereby EAN1 and 2 construct two additional substations south the proposed Friston Substation (also known as Kiln Lane substation) at Friston, and LionLink converter station north of the proposed Saxmundham Converter Station, in combination with the Proposed Project, would result in an increased massing of infrastructure at these locations. The grouping of infrastructure in the same locale would minimise the geographic extent of the visual impact and limit the impacts to localised areas of a HLC type that is common throughout the area. Furthermore, the two Converter Stations would be located in a single field that has resulted from the removal of field boundaries in the post-war period, while the substations would also be focused in large fields formed through the removal of boundaries. While the grouping would constitute a noticeable change to the area's character, this concentration in large single fields focuses development in a HLC type that has been much degraded, while also allowing a collaborative approach to mitigation that could enhance and improve elements such as the surrounding field boundaries. As such, this would represent a medium impact and a **minor adverse effect** which is no greater than the effect assessed for the Proposed Project on its own. As such, there would be no significant cumulative effect.

5.2 Cumulative Effects Assessment – Kent

- 5.2.1 The historic landscape character of the Kent Onshore Scheme varies from arable agriculture on the slightly elevated land of the Ebbsfleet Peninsula, to one that is dominated by pastoral activities in the lower lying land of the former Wantsum Channel where the proposed Minster Converter Station and Substation are located.
- 5.2.2 A prominent landscape characteristic is the prevalence of power-related infrastructure in the backdrop to many views. This includes two existing overhead lines (OHLs) running through the area of the former Wantsum Channel, as well as well as the Richborough Energy Park. Also prominent is the landscape influence of 19th and 20th century rail and road infrastructure which have affected and influenced land-uses, including the growth of industry at Ebbsfleet. A significant level of landscape change is experienced to the east of the A256 Richborough Way, where the semi-natural designed layout of Pegwell Bay Country Park abuts the artificial landscape of Stonelees Golf Centre. The landscape within and surrounding the Kent Onshore Scheme is dominated and characterised by 19th and 20th century change; it contains very few components that have any significant time-depth and, as a result, its overall sensitivity to change is negligible.
- 5.2.3 The permanent above ground infrastructure associated with the Kent Onshore Scheme, comprising the Minster Converter Station and Substation, as well as short new section of OHL, would be located within an area that is already characterised by industry, including Richborough Energy Park and Southern Wastewater Treatment Site. The presence of the Minster Converter Station and Substation, as well as the OHL, into this setting would not be incongruous with the current landscape character and the magnitude of impact is therefore assessed to be small, resulting in a **negligible effect**. The impact to the historic landscape is assessed to be small, resulting in a negligible effect.
- 5.2.4 The permanent infrastructure associated with the other developments, comprising the substation and BESS at Richborough Energy Park, electrical grid infrastructure at land adjacent to Southern Wastewater Treatment Site, and a solar photovoltaic array Weatherlees Hill Wastewater Treatment, would increase the scale of infrastructure in this area, but would not introduce components that were new, or incongruous to the area's baseline character. The effect of the Proposed Project in combination with these other developments would represent a small level of change, which would constitute a **negligible effect**. This would be no greater than the effect assessed for the Proposed Project on its own and as such, there would be no significant cumulative effect.

6. Summary

6.1 Summary

- 6.1.1 This document supplements the Applicant's response to Action Point 55 provided in **Application Document 9.90 Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]** and comprises further assessment of cumulative effects on wider historic landscapes and is submitted at Deadline 5 of the Examination.
- 6.1.2 The assessment has expanded on the baseline provided in the original DCO submissions for both Suffolk and Kent and has examined the potential for cumulative impacts resulting from the schemes considered as part of the original cumulative effects assessment.
- 6.1.3 It has been concluded that in Suffolk the cumulative effect from the Proposed Project in combination with the other developments would represent a medium impact and a **minor adverse effect**. This would be no greater than the effect assessed for the Proposed Project on its own, and as such, there would be no significant cumulative effect.
- 6.1.4 For Kent, the cumulative assessment has concluded that the effect of the Proposed Project in combination with the other developments would represent a small level of change. This would constitute a **negligible effect** which would be no greater than the effect assessed for the Proposed Project on its own. As such, there would be no significant cumulative effect.

References

Suffolk County Council Archaeological Service (2012) The Suffolk Historic England Landscape Characterisation Visualisation Map, Version 3, Bury St Edmunds: Suffolk County Council.

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