

Objection Statement

OBJECTION TO 'NATIONAL GRID ROUTE BETWEEN NORWICH AND TILBURY '

Project Ref: [REDACTED]

Written By: [REDACTED]

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Each generation should shape and sustain the historic environment in ways that allow people to use, enjoy and benefit from it, without compromising the ability of future generations to do the same.

Historic England - Conservation Principles, Policies and Guidance (2008)

1 EXECUTIVE SUMMARY

- 1.1.1. The proposed Norwich-Tilbury line poses a substantial threat to East Anglia's rich historical and cultural heritage. The scheme will result in a permanent, landscape scale, change that will result in harm to the significance of countless heritage assets and their settings. The scheme will also undermine the value of house prices, which, in the case of the thousands of listed buildings likely to be affected, will disproportionately affect the necessary costs homeowners are willing to invest in property in the area of the scheme and reduce investment needed to conserve these buildings as heritage assets in to the future. In tandem this may also result in decline in the area's heritage capita and its attractiveness as a tourist destination.
- 1.1.2. The following is an Objection Statement (OS) commissioned on behalf of the Essex Suffolk Norfolk Pylons Group.
- 1.1.3. The principal grounds for objection relate to the following: the flawed methodology employed by National Grid, including the failure to meet statutory obligations and compliance; failure to provide a sufficiently robust assessment of the heritage resources; failure to undertake a sufficiently robust assessment of the validity of desk-based assessment through full and appropriate 'on site' assessment; failure to address methodological concerns raised by consultees during scoping (such as Historic England); a failure to adequately justify the arbitrary use of distance and designation grade to scope out heritage assets from assessment, and the failure to identify how setting(s) contributes to the significance of identified heritage assets in the way and degree required by National and Local legislation.
- 1.1.4. Based on the above and relevant case law that sets out the importance of assessing alternatives to minimise heritage harm, it is imperative that alternative solutions such as HVDC undergrounding are explored. No mitigation measures can be implemented to offset the significant harm of the overground pylons and wirescape, regardless of where the line is routed. Mitigation provided by HVDC undergrounding, by contrast, will balance the development need of Norwich to Tilbury whilst preserving the region's historic assets and their settings for generations to come.

2 INTRODUCTION

- 2.1.1. This Objection Statement (OS) has been prepared by Virginia Gillece of Fuller Long HEA on behalf of Essex Suffolk Norfolk Pylons Group.
- 2.1.2. Virginia Gillece is a full member of the Institute of Historic Buildings Conservation (IHBC) and the Royal Institution of Chartered Surveyors (RICS) with a BSc in Land Management and an MSc in Architectural Conservation. Virginia has worked in the property sector for over 25 years, and is a partner with Fuller Long HEA.
- 2.1.3. The following OS is submitted in relation to 'Norwich to Tilbury' (The Project) as part of the 2024 Statutory Consultation. The Project is proposed by National Grid Electricity Transmission (NGET) and comprises a major reinforcement of the electricity transmission system to facilitate the transfer of power from the East Anglia region to the rest of the Main Interconnected Transmission System (MITS) thereby enabling the connection of offshore wind generation and bidirectional transfer. The Project is expected to include the development of new 400kV electricity transmission infrastructure including overhead lines, underground cables, a substation and associated modification works to existing transmission and distribution infrastructure.
- 2.1.4. Provisional studies undertaken by Norwich to Tilbury and subsequent non-statutory consultations have led to a preferred option identified for the routing of new transmission infrastructure, and siting of a new substation. The project has now been broken down into eight sections as follows:
- Section A: South Norfolk Council
 - Section B: Mid Suffolk District Council
 - Section C: Babergh District Council, Colchester City Council and Tendring District Council
 - Section D: Colchester City Council
 - Section E: Braintree District Council
 - Section F: Chelmsford City Council
 - Section G: Brentwood Borough Council and Basildon Borough Council (and part of Chelmsford City Council)
 - Section H: Thurrock Council
- 2.1.5. This OS concerns the entire route of the proposed infrastructure from Norwich to Tilbury and its potential and likely impacts on above ground heritage assets only.
- 2.1.6. This OS will provide an overview of the project, the legislative, policy and technical framework against which it is required to accord and the robustness, effectiveness and validity of the methodology and conclusions used to justify the proposed route.

2.1.7. In particular, this OS will attempt to address the following concerns:

Methodology

A. It is contended that the methodology employed by Norwich to Tilbury in its assessment of heritage and archaeological assets, and their settings, has failed to meet the requirements needed to allow the scheme to be progressed based on a robust informed manner.

B. It is contended that the methodology presented for assessment, and its application, has been inconsistent and has not evidenced sufficient understanding of the range of heritage assets that may be affected, what contributes specifically to their heritage significance', and

C. It is contended that without a more informed, robust, consistent methodological approach to the assessment of the impacts of the scheme on above and below ground heritage assets, and their settings, that the scheme has failed to properly assess, and apportion significance in a meaningful way to understand and determine the impacts of the proposed scheme, and resulting harm, on the heritage resource of the region.

2.1.8. As a result of the above, it is contended that the proposed scheme has failed to comply with the requirements set out under heritage legislation, national and local planning policy and relevant technical guidance to give due weight to the impact of the scheme on the heritage resource.

2.1.9. This OS will be divided into three sections:

- 1) The NSIP process and legislation
- 2) Heritage Assets
- 3) Grounds for Objection

2.1.10. A number of case studies have also been undertaken to highlight deficiencies in the Norwich to Tilbury methodology and conclusions. These case studies provide a broad cross section of heritage assets across the entire length of the line and are based upon site visits, an assessment of the data provided by NGET and an assessment of the significance and setting of the assets in accordance with best practice.

2.2 OVERVIEW

2.2.1. This OS has considered the information put forward in the most recent set of reports that have accompanied the 2024 Statutory Consultation for the Norwich to Tilbury Project.

2.2.2. The Preliminary Environment Investigation Report (PEIR) and Appendices provide the information on the likely significant environmental effects of the development. Those sections and appendices relating to the Historic Environment have been assessed for the purposes of this OS.

2.2.3. The results of the PEIR will feed into an Environmental Statement that will be developed as part of the DCO to be submitted to the Secretary of State next year.

- 2.2.4. It is clear from analysis of the methodologies employed and results of the data provided that the main purpose of the PEIR is to substantially reduce the number of Heritage Assets that will be forward to the ES for detailed assessment. Of over 8,500 heritage assets that exist within 5km of the proposed line (the distance at which the pylons are visible), 95% have been scoped out from further assessment.
- 2.2.5. Of the 5% remaining, all have been assessed as likely to be significantly impacted as a result of the Project, with no mitigation proposed to offset the harm that will be caused to the designated assets within 500m of the line. Operational effects on non-designated assets have not been included within the assessment at all.
- 2.2.6. In accordance with paragraph 205-208 of the NPPF, Great Weight should be given to an asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Clear and convincing justification is required for harm as a result of development within a setting and the resulting harm is required to be offset by substantial public benefits to outweigh the harm or loss.
- 2.2.7. The option to HVDC underground the Project will remove the harm that will be caused to the Historic Environment of the region. HVDC undergrounding requires fewer cables and a substantially narrower trench which will effectively negate the environmental and visual impact of the scheme.
- 2.2.8. It has been established within the PEIR that the sections of the route that will be undergrounded will have a neutral – beneficial impact on the Historic Environment in the long run. This solution provides the public benefit of the Project without incurring the very substantial harm to thousands of Listed Buildings and hundreds of Conservation Areas, Registered Parks and Gardens and Scheduled Monuments along the Norwich to Tilbury route.

3 OVERVIEW AND HISTORICAL CONTEXT: THE ROUTE THROUGH NORFOLK, SUFFOLK AND ESSEX

- 3.1.1. The landscape and heritage of East Anglia and Essex is steeped in history and lore, containing some of the country's great estates and finest countryside as painted by Constable and Gainsborough. The land is rich in archaeology and built heritage and provides a huge resource of knowledge, both tangible and intangible with regards to the history of the United Kingdom. The region's contributions to England's development are manifold, encompassing economic prosperity, cultural achievements, artistic inspiration and political and religious influence. Significant events and seismic shifts in history are represented throughout the area, contributing to the unique character and heritage of East Anglia.
- 3.1.2. The route of the proposed Norwich to Tilbury Line crosses some of the most important historic sites in England, leading as it does from the outskirts of the capital at Tilbury, an ancient river crossing point and site of a 16th century fort, to the ancient city of Norwich, land of Boudicca, the Romans and a major stronghold of the Anglo-Saxons in the 6th century. The conversion of East Anglia to Christianity began in earnest in the early 7th century under King Sigeberht, who invited the missionary Felix of Burgundy to establish a bishopric. Over the following centuries, Christianity spread throughout the region, leading to the establishment of numerous churches and monastic communities. The spread of Christianity also brought about significant changes in burial practices, art, and literacy.
- 3.1.3. The Norman Conquest again brought significant change to East Anglia, with the construction of imposing motte and bailey castles to assert their dominance and control over the local population. The Domesday Book, compiled in 1086, provides a detailed account of the landholdings and resources in East Anglia and reveals the extensive redistribution of land from Anglo-Saxon nobles to Norman lords, fundamentally altering the region's social and economic landscape. During the 13th and 14th centuries East Anglia became home to numerous moated manors, which served as the seigneurial residences for the Norman aristocracy.
- 3.1.4. The Middle Ages also saw East Anglia become a centre of the English wool trade. The region's extensive sheep pastures produced high-quality wool, which was exported to markets across Europe. The economic prosperity generated had ripple effects across various sectors but particularly contributed to the patronage of the arts, resulting in the construction of magnificent churches, cathedrals, and guildhalls throughout Norfolk, Suffolk and Essex.
- 3.1.5. The Protestant Reformation had a monumental impact on England, particularly in the rural regions of East Anglia which experienced periods of Catholic suppression and persecution under Elizabeth I and subsequent Protestant rulers. Catholics faced fines, imprisonment, and execution for practising their faith openly. Despite this, notable recusant families in the region continued to practise their faith in secret, and the built evidence from this period abounds throughout the proposed development route.

- 3.1.6. As a result of the Reformation, England also experienced a number of political changes as it facilitated significant shifts in landownership and societal structures. The rise of the landed gentry in East Anglia after the Reformation had consequences for the region's social, economic and political operation. The gentry became the dominant social class, wielding significant influence over local governance, cultural institutions, and community life. The grand country houses, estates, and parklands served as enduring symbols of their wealth, power, and social standing – reflected in the stately homes, churches, and landscapes they commissioned, which continue to define the picturesque landscape of East Anglia to this day.
- 3.1.7. In the 17th century, the impact of the Civil War resulted in the destruction of many country estates that belonged to Royalists, meaning that the remaining country houses became rare and unique examples of the way of life that had preceded the republic. The Enclosure Acts further transformed the rural landscape, consolidating small farms into larger estates, which led to social displacement and changes in rural communities. The Industrial Revolution of the 19th century largely passed the rural areas of the region by, although the movement led to an urbanisation of Britain's population as the working classes moved to cities – many rural properties were abandoned and older historic buildings and landscapes made way for the increasing population. The Romanticism movement, which arose in response to the industrial revolution, led to painters depicting the bucolic countryside of Norfolk, Suffolk and Essex as a refuge from the rapidly changing world. John Constable (1776-1837), arguably the most famous and influential Romantic painter, was deeply influenced by this ideal, and focused on nature as a primary source of inspiration, largely in his home county of Suffolk. Constable's paintings were a celebration of rural life and a commentary on the encroaching industrialisation that threatened to alter it irreversibly.
- 3.1.8. East Anglia later played a crucial role in the two world wars by providing several key air bases for allied forces, such as RAF Tibenham (c.1916) and RAF Raydon (c.1942). The two world wars also accelerated the move towards a more equal society, and the role of the large country houses diminished – many houses had been requisitioned for military or hospitals leaving them in poor condition when they were returned to their families. Rising maintenance bills, increasing death duties, and low income from land led to the sale or demolition of a high percentage of the country house stock throughout the area. All historic buildings that survived the tumultuous period of the 19th and 20th centuries are therefore a precious resource and their conservation for future generations is protected by statute.
- 3.1.9. The proposed route of the Norwich to Tilbury line passes through, or very close to, sites of national and local significance relating to the entire history of the region. The impact to numerous heritage receptors will be significant, with direct substantial harm caused to archaeological sites (such as at Fordham) and Registered Parks and Gardens (such as Langleys) and substantial harm caused to the setting of significant listed buildings such as Flordon Hall and St Marys Church, Buttsbury. Vistas from historic villages and conservation areas such as Great and Little Waltham and Ardleigh will also be severely damaged.

Section 1: NSIP Process and Legislation

4 BACKGROUND

- 4.1.1. This OS has been written in response to the Statutory Consultation which is being carried out by Norwich to Tilbury project in line with the formal requirements of the Planning Act 2008.
- 4.1.2. The Norwich to Tilbury Project (The Project) will provide a new 184km high voltage electricity line across Norfolk, Suffolk and Essex. As the project is of a size, scale and nature to constitute an Environmental Impact Assessment (EIA) development, The National Grid (NGET) produced an EIA scoping report in 2023, which has now been superseded by the Preliminary Environmental Information Report (PEIR) 2024.
- 4.1.3. An EIA Scoping Report was undertaken in 2022 in accordance with the EIA Regulations 2017. The Planning Inspectorate provided a Scoping Opinion in response to the Scoping Report in December 2022. This resulted in a proposed Study Area of heritage assets on either side of the route.
- 4.1.4. Non-Statutory Consultations were undertaken as part of the statutory process in 2022 and 2023 to provide feedback on The Project from statutory consultees and the general public.
- 4.1.5. In April 2024 a Preliminary Environmental Information Report (PEIR) was published to provide information of the likely significant environmental effects of The Project. The PEIR includes a broad assessment of the historic environment (The Historic Environment Baseline Report (HEBR)) within the study area proposed by the Scoping Report. The assessment was carried out by a desk based study which is reproduced in Appendix 11.1. The PEIR states that the desk based study was carried out in accordance with 'standard and guidance for historic environment desk-based assessment' (CIFA, 2014), and provides subjective reasoning for scoping out additional listed buildings, conservation areas, registered parks and gardens, scheduled monuments and non-designated heritage assets from the ES which will be put forward as part of the DCO.
- 4.1.6. The PEIR also includes detailed maps which illustrate the proposed Draft Order Limits (DOL) which comprise the areas of land that are directly impacted by The Project, as a result of the construction or operational phase.
- 4.1.7. A Visual Baseline Assessment has been informed by a Zone of Theoretical Visibility (ZTV), maps of which are provided in PEIR Vol. II: Figures (13.8.1 – 13.8.11).
- 4.1.8. A final Environmental Study (ES) will be produced following this statutory consultation for submission with the DCO next year.
- 4.1.9. This OS relates to the above ground historic environment only. It is based upon the information provided to date within the documents provided by Norwich to Tilbury, and the methodology employed by NGET to address the impact of the Project upon the Historic Environment which will be affected by the proposed tall infrastructure and wire scape. Although impact has also been addressed as a result of the construction phase of The Project, this will not be considered as part of this OS.

5 RELEVANT LEGISLATION AND PLANNING POLICY

5.1.1. The following legislation, policies and guidance are considered material considerations when appraising the impact of the Project.

STATUTORY CONSIDERATIONS

5.1.2. **The Planning Act 2008 (as amended)**

sets out the process through which applications for development consent are made for Nationally Significant Infrastructure Projects (NSIPs) in the fields of energy, transport, water, wastewater, and waste and how such applications can be examined by the Examining Authority and determined by the relevant Secretary of State.

5.1.3. **The Levelling Up and Regeneration Act 2023 (LURA)**

Part 6 covers environmental outcomes (EOR regulations) which includes a wide range of aspects – from protection of the natural environment, to cultural heritage, to landscape considerations.

An EOR (environmental outcomes reporting) must assess 4 core aspects:

- the extent to which the consent is likely to impact on the delivery of the specified environmental outcomes;
- any proposals for increasing the extent to which a specified environment outcome is delivered;
- any proposed steps for avoiding, mitigating, or compensating for the effects of an environmental outcome not being delivered, including assessment of reasonable alternatives; and
- any proposals about how the environmental impact or mitigation should be monitored or secured.

Not all environmental outcomes can be quantified, with effects on landscape and visual resources being a particular example of an environmental effect which could only ever be expressed in a qualitative manner. There will therefore need to be clear guidance for all specified environmental outcomes as to how each of the effects on each environmental receptor will be assessed against the outcome – and what the effect of an adverse conclusion is on the ability to obtain consent.

5.1.4. **The Energy Act 2023**

Section 30 outlines the duty to carry out an impact assessment where the proposal has significant effects on the environment, and must include an assessment of the likely effects on the environment as a result of implementing the proposal.

5.1.5. The Electricity Act (1989)

Schedule 9 (preservation of amenity including: taking into account impacts upon communities. Landscape, visual amenity, cultural heritage and ecological resources).

Section 38 and Schedule 9 of the Electricity Act 1989 state that: "(1) In formulating any relevant proposals, a licence holder or a person authorised by exemption to generate, distribute, supply or participate in the transmission of electricity: (a) shall have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and (b) shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects."

5.1.6. National Policy Statement EN-1 (Overarching National Policy Statement for Energy)

Historic Environment – there is a desirability to sustaining and where appropriate enhancing the significance of heritage assets, their setting and the positive contribution they can make to communities. EN-1 also makes clear that substantial harm to or loss of designated assets of the highest significance, including scheduled monuments; registered battlefields; grade I and II* listed buildings; grade I and II* registered parks and gardens; and world heritage sites, should be wholly exceptional.

- Landscape and Visual – projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate. EN-1 confirms that National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. It makes clear that development consent in these areas can be granted in exceptional circumstances. In such instances, the development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of:
 - the need for the development, including in terms of national considerations, and the impact of consenting or not consenting it upon the local economy;
 - the cost of, and scope for, developing elsewhere outside the designated area or meeting the need for it in some other way, taking account a consideration of alternatives; and
 - any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
- Socio-economics – applicants should identify the impacts of new energy infrastructure and potential mitigation measures.

5.1.7. National Policy Statement EN-5 (Electricity Networks Infrastructure)

Paragraph 2.8.9: The impacts and costs of both overhead and underground options vary considerably between individual projects (both in absolute and relative terms). Therefore, each project should be assessed individually on the basis of its specific circumstances and taking account of the fact that Government has not laid down any general rule about when an overhead line should be considered unacceptable. The IPC should, however only refuse consent for overhead line proposals in favour of an underground or sub-sea line if it is satisfied that the benefits from the non-overhead line alternative will clearly outweigh any extra economic, social and environmental impacts and the technical difficulties are surmountable. In this context it should consider:

- the landscape in which the proposed line will be set, (in particular, the impact on residential areas, and those of natural beauty or historic importance such as National Parks, AONBs and the Broads);
- the additional cost of any undergrounding or sub-sea cabling (which experience shows is generally significantly more expensive than overhead lines, but varies considerably from project to project depending on a range of factors, including whether the line is buried directly in open agricultural land or whether more complex tunnelling and civil engineering through conurbations and major cities is required. Repair impacts are also significantly higher than for overhead lines as are the costs associated with any later uprating); and
- the environmental and archaeological consequences (undergrounding a 400kV line may mean disturbing a swathe of ground up to 40 metres across, which can disturb sensitive habitats, have an impact on soils and geology, and damage heritage assets, in many cases more than an overhead line would)

Paragraph 2.2.10: As well as having duties under Section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to *"have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and ...do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects."*

Paragraph 2.9.25: In such cases the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if it is satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents, and that any technical obstacles associated with it are surmountable. In this context it should consider:

- the landscape and visual baseline characteristics of the setting of the proposed route, in particular, the impact on high sensitivity visual receptors (as defined in the current edition of the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment), residential areas, designated landscapes, designated heritage assets and Heritage Coasts (including, where relevant, impacts on the setting of designated features and areas);
- the additional cost of the proposed underground or sub-sea alternatives, including their significantly higher lifetime cost of repair and later uprating;
- the potentially very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage sites, soil, geology, and, for a substantial time after construction, landscape and visual amenity. (Undergrounding an overhead line will mean digging a trench along the length of the route, and so such works will often be disruptive – albeit temporarily – to the receptors listed above than would an overhead line of equivalent rating);
- the potentially very disruptive effects of subsea cables on the seabed and the species that live in and on it, including physical damage to and full loss of seabed habitats. Cable protection can also be required where cables cross each other, or where they cannot be buried deep enough to protect them from becoming exposed. Such protection causes additional impacts that are often greater than those of the cable itself due to the large areas covered. There can also be issues where subsea cables make landfall, as much coastal land is protected habitat and landfall connections could cause additional disruption to coastal communities.
- the applicant's commitment, as set out in their ES, to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils, particularly regarding Best and Most Versatile land. Such a commitment must guarantee appropriate handling of soil, backfilling, and return of the land to the baseline Agricultural Land Classification (ALC), thus ensuring no loss or degradation of agricultural land. Such a commitment should be based on soil and ALC surveys in line with the 1988 ALC criteria and due consideration of the Defra construction Code

5.2 STATUTE PERTAINING TO THE HISTORIC ENVIRONMENT

5.2.1. The Planning (Listed Buildings and Conservation Areas) Act 1990

This act provides the statutory framework for the protection of listed buildings and conservation areas. General duty as respects conservation areas in exercise of planning functions.

The general duty relating to the exercise of planning functions can be found in paragraphs 66 and 72 and are as follows:

- In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be,

the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

- In the exercise, with respect to any buildings or other land in a conservation area, of any [functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

5.2.2. NPPF (2023)

Section 16 of the NPPF, entitled Conserving and Enhancing the Historic Environment provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets.

Section 16.

Para 189. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites..... These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

The above paragraph clearly recognises that there is a graduation from those assets of lower to higher significance, based on sites identified as of local historic value and increasing through statutory levels of designation to a WHS at an international level. The emphasis then places a responsibility on the conservation of these assets in a manner appropriate to their 'level' of significance. The lesser or greater that 'significance' the lesser or greater the material weighting it is applicable to apply in decision making. As a general rule, under these circumstances, the concept of significance and the attributes that can be attributed to a relative level of 'significance/ historical value' become increasingly more tightly drawn as the level of recognised significance drops from an international level of significance to a local level of significance.

Para 199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Para 200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

(a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

(b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

Para 201. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

Para 202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Para 203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

5.2.3. Local Plans

Adopted and Emerging Local Plans for South Norfolk, Mid Suffolk, Babergh, Colchester, Tendring Braintree, Basildon, Brentwood and Thurrock Councils

5.3 MATERIAL CONSIDERATIONS

5.3.1. The Holford and Horlock Rules

National Grid employs two sets of rules/guidelines for the routeing and siting of new energy transmission infrastructure:

- The Holford Rules, which provide guidelines for the routeing of high voltage overhead transmission lines; and,
- the Horlock Rules, which provide the approach to and guidelines for, the design and siting of substations (in addition to cable sealing end compounds and line entries).

When considering new electricity infrastructure, National Grid have regard to the degree to which options comply or deviate from these rules.

Paragraph 2.8.7 of the existing NPS EN-58 makes clear “that the Holford Rules, and any updates, form the basis for the approach to routeing new overhead lines”. The Holford Rules state that routeing of high voltage overhead transmission lines should where possible, in summary:

- avoid areas of the highest amenity value and smaller areas of high amenity value;
- choose the most direct line with no sharp changes in direction;

- be positioned against tree and hill backgrounds as far as possible;
- prefer moderately open valleys with woods;
- be kept as far as possible from smaller lines, converging routes and other poles, masts, wires and vales to avoid a concentration or 'wirescape'; and
- approach urban areas through industrial zones, where they exist; and when residential and recreational land intervenes between the approach line and the substation, carefully compare costs of undergrounding, for lines other than those of the highest voltage.

The Horlock Rules state that:

- in the development of system options including new substations consideration must be given to environmental issues from the earliest stage to balance the technical benefits and capital cost requirements, against the consequential environmental effects, in order to avoid as far as possible adverse effects;
- siting of substations, sealing end compounds and line entries should seek to avoid areas of the highest amenity, cultural or scientific value by the overall planning of the system connections and areas of local amenity value, important existing habitats and landscape features should be protected as far as reasonably practicable;
- siting of substations, extensions and associated proposals should take advantage of the screening provided by landform and existing features and the potential use of site layout and levels;
- proposals should keep visual, noise and other environmental effects to a minimum;
- land use effects of the proposal should be considered when planning the siting of substations or extensions;
- design of new substations or line entries, early consideration should be given to the options available for terminal towers, equipment, buildings and ancillary development appropriate to individual locations;
- space should be used effectively to limit the area required for development consistent with appropriate mitigation measures and to minimise the adverse effects on existing land use and rights of way, whilst also having regard to future extension of the substation;
- design of access roads, perimeter fencing, earth shaping, planting and ancillary development should form an integral part of the site layout and design to fit in with the surroundings;
- in open landscape especially, high voltage line entries should be kept, as far as possible, visually separate from low voltage lines and other overhead lines so as to avoid a confusing appearance; and,

- the inter-relationship between towers and substation structures and background and foreground features should be studied to reduce the prominence of structures from main viewpoints. Where practicable the exposure of terminal towers on prominent ridges should be minimised by siting towers against a background of trees rather than open skylines.

5.3.2. National Planning Practice Guidance

The NPPG is a web-based resource which is to be used in conjunction with the NPPF. It is aimed at planning professionals and prescribes best practice within the planning sector. The relevant section is entitled 'Conserving and enhancing the historic environment'. The guidance given in this section is effectively a condensed version of the PPS5 Practice Guide and sets out the best practice to applying government policy in the NPPF. It provides an interpretation for each of the interests assigned to heritage assets in understanding its significance; archaeological, architectural and artistic, and historic.

For ease of reference the following legislative and policy considerations are considered of particular relevance, and are set out below. Sections underlined are identified as of particular relevance by the author.

5.3.3. Historic England Guidance

As a statutory consultee, Historic England guidance should be a key document when assessing the impact of a development on the setting of a heritage asset. Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), 'The Setting of Heritage Assets' is the principal source that '*gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting.*'

Historic England recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to the complexity of the case, from straightforward to complex:

Step 1: Identify which heritage assets and their settings are affected

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

Step 5: Make and document the decision and monitor outcomes

5.3.4. Case Law

In determining the effects of the Scheme this OS is also cognisant of case law. Including the below:

- FLAG STATION, MANSEL LACY, HEREFORDSHIRE [22/09/2015] Case Number EWHC 2688

This ruling has emphasised the primacy of the 1990 Planning Act – and the fact that it is up to the decision makers in the planning system to 'have special regard to the desirability of preserving the [listed] building or its setting'. As stated by HH Judge David Cooke in a judgment of 22 September 2015 regarding the impact on the setting of a listed building:

'It is still plainly the case that it is for the decision taker to assess the nature and degree of harm caused, and in the case of harm to setting rather than directly to a listed building itself, the degree to which the impact on the setting affects the reasons why it is listed.'

- PALMER APPELLANT AND HEREFORDSHIRE COUNCIL AND ANR [04/11/16] Case No: C1/2015/3383

The judgment was agreed by Lord Justice Lewison at the Court of Appeal, who stated that:

'It is also clear as a matter both of law and planning policy that harm (if it exists) is to be measured against both the scale of the harm and the significance of the heritage asset. Although the statutory duty requires special regard to be paid to the desirability of not harming the setting of a listed building, that cannot mean that any harm, however minor, would necessarily require planning permission to be refused.'

With regards to non-designated heritage assets the NPPF does not apply the substantial harm test and it is clear that no additional weight is given to non-designated heritage assets but that a balanced judgement will be required with regard to the scale of harm and the significance of the heritage asset.

It is noted that setting is not a heritage asset, nor a heritage designation. The importance of setting lies in what it contributes to the significance of a heritage asset or to the ability to appreciate and understand that significance.

- The case of JONES V MORDUE AND OTHERS concerned an appeal decision approving plans for a single wind turbine at Poplars Farm near Wappenham, Northamptonshire, after South Northamptonshire Council failed to determine the application within the prescribed period.

The inspector found that the turbine would cause "less than substantial" harm to the setting of a grade II* listed church, and its harmful effect on other heritage assets in the area would be negligible. Wappenham Wind Turbine Action Group challenged the decision in the High Court over concerns about the turbine's visual impact on the church.

- The leading judgment on this topic is BARNWELL MANOR WIND ENERGY LTD V EAST NORTHAMPTONSHIRE DISTRICT COUNCIL, English Heritage, the National Trust and Secretary of

State for Communities and Local Government [2014]. The Barnwell ruling quashed an inspector's decision to approve four wind turbines on land near the 17th century Barnwell Manor in East Northamptonshire. The scheme could have affected 40 designated heritage assets, including the grade I listed Drayton House and the National Trust's Lyveden New Bield property. The Barnwell decision held that, in enacting section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, Parliament intended that the desirability of preserving the settings of listed buildings should be given "considerable importance and weight". It confirmed that "preserving" means doing "no harm". Lord Justice Sullivan said this created a "strong presumption against the grant of planning permission" – tipping the scales heavily in favour of preserving the settings of heritage assets.

Following a challenge brought by the applicant in the Mordue case, the Court of Appeal confirmed that a proper analysis of impact on heritage assets requires considerable weight to be given to the desirability of preserving listed buildings and their settings. However, decision-makers can demonstrate they have done this without repeating the specific words used in Barnwell. Developers and local authorities should continue to place considerable importance and weight on the impact of development on heritage assets or their settings when undertaking the requisite balancing exercise.

- The need for rigorous assessment of alternatives was set out in the High Court's judgement in *FORGE FIELD V SEVENOAKS DISTRICT COUNCIL* (2014). The Court found that a rigorous assessment of alternatives is required to minimize heritage harm and to ensure that the statutory presumption in favour of preservation is met. Specifically, *"If there is a need for development of the kind proposed, which in this case there was, but the development would cause harm to heritage assets, which in this case it would, the possibility of the development being undertaken on an alternative site on which the harm can be avoided altogether, will add force to the statutory presumption in favour of preservation."*
- Further, the Court of Appeal's judgement in *BRAMSHILL VS SECRETARY OF STATE FOR HOUSING, COMMUNITIES AND LOCAL GOVERNMENT* (2021) emphasises that heritage impacts must be treated differently to other factors in the planning balance. This includes considering possible alternatives. These alternatives must be rigorously assessed, otherwise there is a risk of legal error under the Planning (Listed Building and Conservation Areas) Act 1990.

6 SIGNIFICANCE

6.1 ASSESSING HERITAGE SIGNIFICANCE

- 6.1.1. Significance is a concept that forms the foundation of conservation philosophy. The NPPF states that heritage 'assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.'
- 6.1.2. Heritage assets are defined in the NPPF (Annex 2) as '*A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (i.e through local listing).*'
- 6.1.3. The framework (NPPF Annex 2) goes onto define significance as, '*The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.*'
- 6.1.4. Following Historic England's Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment (2008), significance can commonly be derived from five areas:
- 6.1.5. **Evidential Value:** this derives from the potential of a place to yield evidence about past human activity. The evidential value of a place is largely derived from physical remains, these remains maybe archaeological (below ground), embedded in upstanding remains within the landscape or within built heritage (above ground remains).
- 6.1.6. **Historical Value:** this derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative.
- 6.1.7. **Aesthetic Value:** derives from the ways in which people draw sensory and intellectual stimulation from a place.
- 6.1.8. **Communal Value:** this derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical value but tend to have additional and specific aspects that establish a more direct relationship between a group or groups both in the past and or present.
- 6.1.9. **Setting:** the setting of a heritage asset is defined in the NPPF as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.' Setting is not an asset in itself.

6.2 SETTING

6.2.1. This OS is based upon the impact of the proposed Norwich to Tilbury infrastructure upon the contribution made by the setting to the heritage assets surrounding the preferred route of the pylons. As such, a detailed assessment of settings needs to be provided. Assessments should be based upon *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition, 2017)*.

6.2.2. This guidance gives assistance concerning the statutory obligation on decision-makers *'to have special regard to the desirability of preserving listed buildings and their settings, and the policy objectives in the NPPF and the PPG establishing the twin roles of setting...: it can contribute to the significance of a heritage asset, and it can allow that significance to be appreciated. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the heritage asset's conservation, including sustaining significance (NPPF, paragraph 132).'*

6.2.3. The guidance goes on to say:

'Consideration of the contribution of setting to the significance of heritage assets, and how it can enable that significance to be appreciated, will almost always include the consideration of views. The staged approach to taking decisions on setting given here can also be used to assess the contribution of a view, or views, to the significance of heritage assets and the ability to appreciate that significance.'

6.2.4. The NPPF describes the setting of a heritage asset to be:

'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral' (NPPF, Annex 2: Glossary).

6.2.5. In addition, the PPG outlines the definition of setting and how it should be taken into account, stating:

'A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.

The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance.'

(PPG, paragraph: 013, reference ID: 18a-013-20140306).

6.2.6. Furthermore, the NPPF makes it clear that:

'Extensive heritage assets, such as historic parks and gardens, landscapes and townscapes, can include many heritage assets, historic associations between them and their nested and overlapping settings, as well as having a setting of their own. A conservation area is likely to include the settings of listed buildings and have its own setting, as will the hamlet, village or urban area in which it is situated'.

6.2.7. The importance of the setting of the heritage assets lies in the contribution that it makes to the significance (or the ability to appreciate the significance) of the various NDHAs, Listed Buildings, Conservation Areas, Registered Parks and Gardens and Scheduled Monuments that line the preferred route of the tall infrastructure. According to GPA 3, considerations which may affect that contribution include:

- Change over time – *'Settings of heritage assets which closely resemble the setting at the time the asset was constructed or formed are likely to contribute particularly strongly to significance'.*
- Cumulative Change – *'Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting'.*
- Access and setting – *'significance is not dependent on numbers of people visiting it; this would downplay such qualitative issues as the importance of quiet and tranquillity as an attribute of setting'.*
- Buried assets and setting – *buried remains may 'retain a presence in the landscape and, like other heritage assets, may have a setting'.*
- Designed settings – generally parks and gardens surrounding a great house, but may *'include land beyond designed boundaries which is associated with the asset and is visible from it', and which may make 'an important contribution to the historic character of the site'.*
- Setting and urban design – relates to townscapes.
- Setting and economic viability – *'the economic viability of a heritage asset can be reduced if the contribution made by its setting is diminished by badly designed or insensitively located development'.*
- Views and setting – *'The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across,*

or including that asset. Views which contribute more to understanding the significance of a heritage asset include those where the composition within the view was a fundamental aspect of the design or function of the heritage asset'.

- 6.2.8. If the proposed Norwich to Tilbury development is likely to compete with the heritage assets by changing their settings or by impacting a designed or associative view, then the impact to their settings will need to be taken into consideration by the decision maker.

PROCESS

- 6.2.9. GPA3 sets out a staged approach to proportionate decision-taking which is followed below:

Step 1: Identify which heritage assets and their settings are affected

- 6.2.10. A need for proportionality has to be considered at the scoping stage which includes the following:
- An indication of whether the proposed development has the potential to affect the setting of the heritage assets;
 - The specification of an 'area of search' around the proposed development within which it is reasonable to consider setting effects, or
 - Consideration of a 'Zone of Visual Influence' or 'Zone of Theoretical Visibility' in relation to the proposed development in order to better identify heritage assets and settings that may be affected.

A Zone of Theoretical Visibility has been produced by NGET which illustrates that the tall infrastructure has the potential to be visible to all heritage assets within a 5km swathe each side of the line. A Scoping Report has proposed three study areas which extend up to 3km each side of the line, depending on the level of significance afforded to the asset. A scoping exercise has also been undertaken to exclude assets that NGET believes will not be impacted as a result of the Project.

Step 2: Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

- 6.2.11. It will then be necessary to assess whether the setting of each asset makes a contribution to their significance and the extent and nature of that contribution and the degree to which the setting allows the assets to be appreciated. This assessment should include:
- the asset's intangible associations with the land surrounding it, and the historic patterns of use;
 - the contribution made by other influencing factors such as noises or smells, etc;
 - an assessment of the way views influence an appreciation of the significance of the asset.

- 6.2.12. Identifying features of a setting that contribute to the significance of the asset and attributing emphasis to these features will be based upon historical associations of the landscape, how the surrounding countryside has changed over time and how the setting may differ today.
- 6.2.13. What is important to bear in mind when considering views is how a view allows the significance of an asset to be appreciated – the asset does not necessarily have to be in the view, but may be linked to a view historically which adds meaning to the historical significance of a place.
- 6.2.14. Historic England have provided a checklist of the potential attributes of a setting that could be considered when assessing contribution to an asset's significance. This checklist can be seen in Figure 1 below.
- 6.2.15. This assessment of the contribution to significance made by setting will provide the baseline for establishing the effects of a proposed development on significance, as set out in 'Step 3' below.

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it

- 6.2.16. The third stage seeks to identify the impact of the development on the setting and the resulting harm to the asset. The impact may be more than visual and include several factors identified above.
- 6.2.17. The proposed development should be assessed in terms of the following:
- location and siting
 - form and appearance
 - wider effects
 - permanence
- 6.2.18. Further consideration should also be given to the scale, prominence, proximity or placement of a development when considering the impact to the hamlet.

- 6.2.19. Historic England have provided a checklist of the potential attributes of the development proposal that should be considered as part of the decision making process. This checklist has been included below (Figure 2).

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

- 6.2.20. The Historic England guidance notes make it clear that developers should make an early assessment of setting to provide the baseline for the siting and form of the development which reduces conflict with landowners later in the process.
- 6.2.21. Enhancement should be considered, but where this is not possible, GPA3 states:

'Options for reducing the harm arising from development may include the repositioning of a development or its elements, changes to its design, the creation of effective long-term visual or acoustic screening, or management measures secured by planning conditions or legal agreements.'

Step 5: Make and document the decision and monitor outcomes

- 6.2.22. Documenting each stage of the decision-making process in a clear and straightforward manner is recommended, setting out how the setting of each contributes the significance of the asset together with the anticipated effect of the proposals. It is recommended that focus should be limited to a small number of key attributes of the asset, the setting and the proposed development, in order to avoid undue complexity.

Assessment Step 2 Checklist

The starting point for this stage of the assessment is to consider the significance of the heritage asset itself and then establish the contribution made by its setting. The following is a (non-exhaustive) check-list of potential attributes of a setting that may help to elucidate its contribution to significance. It may be the case that only a limited selection of the attributes listed is likely to be particularly important in terms of any single asset.

The asset's physical surroundings

- Topography
- Aspect
- Other heritage assets (including buildings, structures, landscapes, areas or archaeological remains)
- Definition, scale and 'grain' of surrounding streetscape, landscape and spaces
- Formal design eg hierarchy, layout
- Orientation and aspect
- Historic materials and surfaces
- Green space, trees and vegetation
- Openness, enclosure and boundaries
- Functional relationships and communications
- History and degree of change over time

Experience of the asset

- Surrounding landscape or townscape character
- Views from, towards, through, across and including the asset
- Intentional intervisibility with other historic and natural features
- Visual dominance, prominence or role as focal point
- Noise, vibration and other nuisances
- Tranquillity, remoteness, 'wildness'
- Busyness, bustle, movement and activity
- Scents and smells
- Diurnal changes
- Sense of enclosure, seclusion, intimacy or privacy
- Land use
- Accessibility, permeability and patterns of movement
- Degree of interpretation or promotion to the public
- Rarity of comparable survivals of setting
- Cultural associations
- Celebrated artistic representations
- Traditions

Figure 1. Assessment Step 2 Checklist - Historic England General Practice Guidance 3 : The Setting of Heritage Assets.

Assessment Step 3 Checklist

The following is a (non-exhaustive) check-list of the potential attributes of a development affecting setting that may help to elucidate its implications for the significance of the heritage asset. It may be that only a limited selection of these is likely to be particularly important in terms of any particular development.

Location and siting of development

- Proximity to asset
- Position in relation to relevant topography and watercourses
- Position in relation to key views to, from and across
- Orientation
- Degree to which location will physically or visually isolate asset

Form and appearance of development

- Prominence, dominance, or conspicuousness
- Competition with or distraction from the asset
- Dimensions, scale and massing
- Proportions
- Visual permeability (extent to which it can be seen through), reflectivity
- Materials (texture, colour, reflectiveness, etc)
- Architectural and landscape style and/or design
- Introduction of movement or activity
- Diurnal or seasonal change

Wider effects of the development

- Change to built surroundings and spaces
- Change to skyline, silhouette
- Noise, odour, vibration, dust, etc
- Lighting effects and 'light spill'
- Change to general character (eg urbanising or industrialising)
- Changes to public access, use or amenity
- Changes to land use, land cover, tree cover
- Changes to communications/accessibility/permeability, including traffic, road junctions and car-parking, etc
- Changes to ownership arrangements (fragmentation/permitted development/etc)
- Economic viability

Permanence of the development

- Anticipated lifetime/temporariness
- Recurrence
- Reversibility

Figure 2. Assessment Step 3 Checklist - Historic England General Practice Guidance 3 : The Setting of Heritage Assets.

7 NORWICH TO TILBURY: ASSESSEMENT, SCOPING AND OPINION

7.1.1. Major Infrastructure Projects require Environmental Statements (ES) to be provided with their DCO application which must provide sufficiently robust and detailed data of the effects of the proposed development on the environment, so that these can be considered throughout the NSIP consenting process. The scoping out of the majority of the heritage assets during the pre-application stage therefore negates the efficacy of the ES, as a detailed assessment of the effects of the proposed development on the environment will address only 5% of the total historic environment that will be impacted by the scheme.

Scoping Report and Opinion

7.1.2. In 2022 Norwich to Tilbury (then East Anglia Green (EAG) produced a Scoping Report. The report was produced in order to seek a Scoping Opinion from The Planning Inspectorate as required under Regulation 10(1) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations). *Regulation 14 of the EIA Regulations 2017 identifies that an Environment Statement (ES) must include the information reasonably required for reaching a reasoned conclusion on the significant environmental effects. The reasoned conclusion should take into account current knowledge and methods of assessment. The Planning Inspectorate was keen to emphasise this requirement within the Scoping Opinion since it relates clearly to the obligation placed on the decision maker (Secretary of State) under Regulation 21(b) of the EIA Regulations 2017.*

7.1.3. The Scoping Opinion was provided by the Planning Inspectorate in December 2022. The response clearly stated that the Environmental Statement (ES) to be provided by The Applicant would need to *'demonstrate that the aspects/ matters [that have been scoped out] have been appropriately addressed,... explain[ing] the reason[ing] for scoping them out and justify[ing] the approach taken'*.

7.1.4. The Planning Inspectorate stipulated that study areas should be established in order to undertake an environmental assessment, the extent of which should be in accordance with recognised professional guidance and best practice, whenever this is available, and determined having regard to the extent of the likely impacts. The study areas should be agreed with relevant consultees and, where this is not possible, should be stated clearly in the ES along with a reasoned justification.

7.1.5. It was agreed as part of this Opinion that significant effects as a result of the operation (including maintenance) of the power lines were unlikely to occur if the proposed development was routed to avoid direct physical impacts on historic buildings and so could be scoped out of the ES, unless there was a permanent loss of features that contribute to the historic landscape. However, the Inspectorate considered that indirect physical impacts through vibration or subsidence (during construction and operation including maintenance) should be scoped in to the Environmental Assessment.

7.1.6. With regards to the impact on setting of listed buildings and non-designated listed buildings, NGET proposed a methodology for scoping out heritage assets, and qualified that the scoping out thresholds may be altered following further review. The Planning Inspectorate disagreed with this methodology, stating that:

'Based on [the] limited information and justification provided in terms of individual heritage assets, the Inspectorate is not in a position to scope these matters out of the ES at this stage without further consideration of the significance of heritage assets and the contributions made by their setting on a case-by-case basis'.

7.1.7. NGET accepted in the Scoping Report that *'overall, there is the potential for significant adverse effects during construction and significant adverse or beneficial effects during operation (inc. maintenance) to historic buildings. Therefore, effects on the setting of historic buildings are proposed to be scoped into the ES'.*

And

'Overall, there is the potential for adverse or beneficial effects on the setting of historic landscapes (both designated and non-designated) during construction and operation. Therefore, effects on the setting on historic landscapes are proposed to be scoped into the ES'.

CONSIDERATION OF THE ISSUES

7.1.8. Despite the Planning Inspectorate advice and consultee responses warning against such a 'broad brush' approach, a scoping method within the Preliminary Environmental Investigation Report (2024) (PEIR), has adopted an approach which excludes designated and non-designated assets from any further assessment based purely on a computer generated algorithm which uses quantitative data only. This is in direct contravention of Planning Inspectorate Advice and contrary to National and Local policy and guidance

PEIR Methodology / approach used to undertake the preliminary assessment on the Historic Environment

Scoping

7.1.9. Section 11.5 (Approach and Methods) of the PEIR report outlines the scoping method employed to provide a proportionate assessment of the heritage assets that would be taken forward for assessment within the study areas.

7.1.10. Listed buildings and non-designated historic buildings have been scoped out if:

- The buildings are beyond the 250 m study area and are outside the ZTV. At this distance from the Project the only change to setting is likely to be visual and therefore a lack of visibility of the Project would mean that it can be reasonably concluded that no change to setting would occur.

- Buildings that are of a type that have a restricted setting due to their inherent characteristics. This group includes, but may not be limited to milestones, signposts, or way makers, drinking fountains, pump heads, dove cots, icehouses, and gravestones /markers/ tombs within churchyards.
- Buildings that are located within settlements and do not have settings that extend beyond the urban area and where the Project does not introduce new infrastructure into this setting. This requires a rapid assessment to check that any buildings in this category with settings that extend to the Project are included in assessment. This has been undertaken based on a building's location (supported by review of current mapping and aerial imagery). It was assumed that domestic buildings, shops, public houses have settings that are informed by their settlement location and do not extend beyond this, except were demonstrated otherwise by location information. This also includes buildings located within conservation areas.
- Buildings that are separated from the Project by other major infrastructure (e.g., motorways, major dual carriageways, active mainline railways) where it can be reasonably concluded that the infrastructure was a pre-existing barrier that the setting of a building would not extend beyond.
- Buildings within Tilbury Docks whose function and significance is derived from the activities of the docks and do not extend beyond the geographical limits of the dockyard as the Project does not introduce new infrastructure into this setting.
- Buildings that are separated from the Project by the Bramford, Norwich Main and Tilbury Substations as these structures already have a notable influence on the setting of assets that the addition of overhead lines beyond does not create appreciable change. Cumulative likely significant environmental effects will be assessed as part of the ES.
- Any other listed buildings and non-designated buildings (not already scoped out for one of the above reasons) where it has been identified that their settings do not extend to the Project and therefore there would be no potential for impact. This is identified through the assessment of setting and value in Appendix 11.1: Historic Environment Baseline Report in Volume III, and where identified, these buildings are not to be taken forward for impact assessment in the PEIR.

7.1.11. It is considered that the methodology used by NGET to scope out assets at various stages from the Scoping Report of 2022 to the PEIR of 2024 has not followed Historic England guidance described above and has based the scoping out criteria (above) on elements that in reality do not provide mitigation from the Project. Buildings within settlements may well have settings that are impacted by the project, and buildings that are separated from the Project by roads and railways may still have their settings impacted by the introduction of tall infrastructure impacting views not previously harmed by major roads

and railways. It is considered therefore that a large number of assets that have the potential to be harmed by the Project have been scoped out without due consideration.

- 7.1.12. In addition, whilst those assets that were scoped in within the study areas have been listed and described on a case by case basis within the Heritage Environment Baseline Report, the widespread scoping out of assets from further assessment on the basis that their settings do not extend to the DOL is fundamentally flawed. The assessment of impact to the settings of these assets was based upon a desk study and the impact of views of the tall infrastructure upon the significance of these assets has not been properly assessed as heritage specific viewpoints have yet to be undertaken. Whilst NGET states that a proper assessment of the impact of the Project will be undertaken in the ES next year, this will only apply to a tiny number of heritage assets that are being taken forward with the result that the majority of the historic environment surrounding the line in Essex, Suffolk and Norfolk will not have properly been assessed in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990 and section 16 of the NPPF (2023).

7.2 PRELIMINARY ENVIRONMENTAL INVESTIGATION REPORT (PEIR)

- 7.2.1. The PEIR sets out the information that *'is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development'*

APPROACH AND METHODS

- 7.2.2. The PEIR states that *'the methodology for the assessment of heritage assets is based on guidance set out by IEMA, IHBC and ClfA on how Historic Environment should be assessed in EIA (IEMA, IHBC, ClfA 2021)'*. The assessment of the contribution made by their settings has been based upon a baseline desk study using aerial imagery and targeted walkovers.
- 7.2.3. As confirmed by the scoping opinion provided by the Planning Inspectorate, the study areas for the historic environment comprises the DOL plus a 250 m buffer for non-designated heritage assets. In addition, two wider study areas have been defined: the first, extends 2 km around the DOL and is used for all designated heritage assets; the second, comprises up to 3 km from the DOL for designated assets of the highest significance (scheduled monuments, grade I and II* listed buildings and grade I and II* registered parks and gardens).
- 7.2.4. The PEIR is based upon a Historic Environment Baseline Report (HEBR) which is discussed in more detail below.

CONSIDERATION OF THE ISSUES

- 7.2.5. Those assets within the ZTV between 3km and 5km have not been assessed, although in certain locations, and in accordance with the approach for the LVIA, including ZTV, the study area may be increased, for example where topography allows for more distant views. This is to ensure that heritage assets, where their setting could be affected, are included in assessment. As heritage specific viewpoints

have yet to be assessed, any assets beyond the 3km buffer have not been included within this assessment, and are therefore unlikely to be taken forward to the ES.

7.2.6. A Historic Environment Baseline Report (HEBR) is provided within Appendix 11.1 of the PIER (see above). The HEBR has scoped out approximately 1600 heritage assets from within the study areas which will not be put forward for further assessment within the PEIR. The methodology for scoping out the majority of the heritage assets within the HEBR has been criticised by PINS and Consultees as not having adequate information on which to base an informed decision of the setting of the assets which have views of the tall infrastructure. Analysis of the HEBR would suggest that almost all of the assets that have been brought forward for assessment by the PEIR have been scoped in as a result of near proximity to the line rather than as a proper assessment of setting and the impact of The Project upon their settings.

7.2.7. Historic England Good Practice Advice in Planning Note 3 (GPA3) identifies that there are scenarios where complex projects involve multiple assets. The guidance states:

'Cases involving more significant assets, multiple assets, or changes considered likely to have a major effect on significance will require a more detailed approach to analysis, often taking place within the framework of Environmental Impact Assessment procedures. Each of the stages may involve detailed assessment techniques and complex forms of analysis such as viewshed analyses, sensitivity matrices and scoring systems. Whilst these may assist analysis to some degree, as setting and views are matters of qualitative and expert judgement, they cannot provide a systematic answer. Historic England recommends that, when submitted as part of a Design and Access Statement, Environmental Statement or evidence to a public Inquiry, technical analyses of this type should be seen primarily as material supporting a clearly expressed and non-technical narrative argument that sets out 'what matters and why' in terms of the heritage significance and setting of the assets affected, together with the effects of the development upon them.

7.2.8. In addition, an assessment of the impact to the setting of built heritage non-designated assets (NDHAs) has not been adequately undertaken at all. An assessment of the preliminary operational effects upon NDHAs within the 250m buffer zone has not been presented within the PEIR. As a consequence, only 175 NDHAs will be taken forward to the ES based upon the direct impact of the Project at construction stage.

7.2.9. Furthermore, the production of the assessment tables within the PEIR systematically failed to cross reference the significance and settings assessments undertaken in the HEBR, with the result that the wrong data was used in the matrix calculation leading to inaccurate results. Assets that were assessed as having settings that made a considerable or moderate contribution to their significance were downgraded to a having a moderate to minor contribution within the tables (see examples Bleak Hall 1251669 and Flordon Hall 1050698), leading to misleading outcomes of the Project. In many cases, the wrong data being fed into the assessment tables has led to polar opposite conclusions. For instance, the

line is described as being undergrounded in several instances, thus causing no impact to the listed buildings, when in fact the line will be overground causing severe harm to the setting of the listed buildings (see Vauxhall 1351957 and Thatched Cottage 1322652).

- 7.2.10. Following the HEBR, a preliminary Historic Environment Assessment was undertaken within the PEIR for the remaining 458 designated assets whose settings are considered to extend to the DOL. This assessment allocated a magnitude of impact (No Change – High) against the value of each asset (Negligible- Very High) to calculate an assessment of the effect of the Project upon the significance of the asset. (Negligible, Neutral, Minor, Minor-Moderate and Moderate – Major) together with an assessment of whether the impact is likely to be significant, not significant and permanent or temporary. This quantitative approach using a tabulated assessment is entirely inappropriate for all but the most straightforward of assessments, as outlined in GPA3 above. In reality, a qualitative approach is required to assess significance and impact, which is the standard professional approach to assessing heritage assets in line with Historic England and IHBC guidelines.
- 7.2.11. Of the assets that remain scoped in following the HEBR assessment, it is considered that the operational effects of the pylons will have a 'significant permanent negative effect' on 123 assets, a 'not significant permanent negative effect' on 178 assets, a 'not significant permanent positive effect' on 15 assets and a 'neutral' effect on 142 assets. This equates to a mere 5% of the total number of assets for which the line is likely to be visible, and 12% of the total number of heritage assets within the study areas proposed within the Scoping Report of 2022. Of the total number of heritage assets actually assessed within the HEBR, the number being taken through to the ES represents 21% of the total which is not representative of the actual impact of The Project on the ground, as evidenced by almost 8000 responses to the non-statutory consultations.
- 7.2.12. This failure to properly assess the numerous heritage assets that will be impacted by the scheme has huge repercussions. In assessing the planning balance of the benefits of the NSIP over the harm to the historic environment, the DCO will be heavily weighted towards the public benefits of the Project, as the environmental impacts of the scheme to the region's heritage assets has been almost completely disregarded.

OTHER MATTERS

- 7.2.13. Within the PEIR, NGET has provided a response to the Scoping Opinion provided by the Planning Inspectorate. This response challenges many aspects of the Scoping Opinion, and the PEIR has been produced without further reference to recommendations by the Planning Inspectorate where they clash with the objectives of Norwich to Tilbury.
- 7.2.14. Likewise, feedback from Local Planning Authorities and other statutory consultees has been addressed within the PEIR, within table 11.1. This table provides a response to the stakeholder engagement, referencing a summary of the issues raised with generic responses such as 'the feedback has informed

the assessment in the PEIR', or that 'a future assessment will be presented in the ES'. This is meaningless, and does not address the concerns raised by Local Authorities and other stakeholders such as Historic England. Norwich to Tilbury has largely proceeded regardless of consultee suggestions and concerns, with the result that only 21% of the total number of heritage assets identified within the study areas will be properly assessed as part of the DCO, leaving thousands of heritage assets scoped out from any proper assessment.

7.3 HISTORIC ENVIRONMENT BASELINE REPORT

7.3.1. The Historic Environment Baseline Report (HEBR) has provided an assessment of the identified heritage assets within the Study Area as proposed in the Scoping Report (2022): This includes all assets within 250m of the DOL, all designated listed buildings within 2km of the DOL and all highly significant buildings within 3km of the DOL. A distinction for conservation areas has not been made, but all were classified as having medium value within the HEBR. Any buildings not scoped out for the above reasons have their settings and value assessed and described in Appendix 11.1: Historic Environment Baseline Report in Volume III and are included in this PEIR.

7.3.2. The aims of the HEBR are to establish which assets are to be put forward for assessment within the EIA of the PEIR, based upon whether their settings extend to the DOL. The methodology employed used desk based assessments for each asset, and followed guidance as detailed in the Approach and Methods above (and within Appendix C of the PEIR). The assessments do not appear to have included site visits.

CONSIDERATION OF THE ISSUES

7.3.3. Any heritage assets beyond the 3km buffer zone either side of the preferred of The Project have not been assessed on the basis that limited visibility of the high infrastructure will have no impact on the contribution made by their setting despite the ZTV covering 5km which is the area from which the Project may theoretically be visible (Figures 13.8.1 to 13.8.11: Zone of Theoretical Visibility of Project by Section / CSE compounds / substations in Volume II).

7.3.4. The Landscape and Visual Chapter within The PEIR goes on to state that '*In most instances pylons are likely to be barely perceptible beyond 5 km and therefore unlikely to give rise to significant effects*' (13.5.25, Zone of Theoretical Visibility Mapping). This indicates that there will be assets in some instances within the 3-5km range that will still be impacted.

7.3.5. Paragraph 13.5.5 of the Landscape and Visual Chapter also clarifies that more distant viewpoints up to 5 km from the Project are to be considered where there is the potential for significant visual effects that arise beyond the 3 km study area, for example where there are particularly sensitive visual receptors and where topography allows more far-reaching views. It is considered that this process should also apply to heritage assets, as there may well be particularly sensitive heritage assets within the 3-5km range which have not been included within the assessment due to them being located beyond the study area. Exceptions for assets which are affected as a result of topography allowing for more widespread

views cannot be made if they have not been identified. The Project response to consultee comments confirms that heritage specific viewpoints are not assessed within this PEIR but will be included in the ES based on the design to be presented in the DCO application (Table 11.1).

- 7.3.6. The report identifies and describes the heritage assets within the study area, and provides a basic assessment of the value of each asset, including any contribution made by an asset's setting. Those assets which are not considered to be impacted by The Project have been excluded from further assessment. The report states that this assessment has been based upon desk based analysis only, using aerial imagery and professional opinion. No site visits appear to have been made to assess the setting of heritage assets as part of this process.
- 7.3.7. The Archaeological and Historical Background is based on HER data, and reflects an Archaeological Desk Based Assessment rather than providing an in-depth Heritage analysis of the designated and non-designated built environment. The assessment of large numbers of archaeological finds is also not relevant to this Historic Baseline Assessment and makes for an inaccessible and cumbersome EIA which is counterproductive in identifying clearly the actual likely environmental effects from the proposal, which become buried in a mass of documentation.
- 7.3.8. Based on data collated from a GIS survey undertaken by Fuller Long HEA, out of a total of 8,846 heritage assets that were identified within a 5km buffer either side of the DOL (roughly equating to the ZTV), over 5,500 were immediately scoped out by the establishment of the study areas. Approximately, an additional 1600 assets were scoped out as a result of scoping criteria (provided within the Historic Environment Study Area, Volume II). The remaining 2,117 assets (data from PEIR) was assessed in the HEBR on a case by case basis, to scope out additional assets that are considered not to be impacted as a result of harm to their settings.
- 7.3.9. These assets (totalling around 1,600) were scoped out via a desk based assessment using aerial imagery and HER data. Walkover surveys relate in the main to archaeological assessments and have not included site visits to heritage assets to assess setting in person. The methodology used for scoping out the majority of the assets is therefore entirely inadequate and is in contravention of guidance produced by Historic England, IHBC and the NPPF. Examples of assets being improperly scoped out can be found at Little Wenham. Here, there are two grade I assets, one grade II*, five grade II assets and one scheduled monument. Despite the assets forming a group as part of the hamlet of Little Wenham, all bar one were scoped out from further assessment in the EIA, including a grade I and grade II*listed buildings, which share the same setting as the grade I listed church that was taken forward to the assessment table. The church was then subsequently scoped out on the basis that the project will result in no change within the setting of the asset, despite a wirescape visualisation in part 16 of 27, Volume II: Figures, demonstrating that the pylons will be clearly visible to the visual receptors within Little Wenham.
- 7.3.10. Furthermore, the number of built non-designated heritage assets remains unknown. The scoping exercise within the HEBR has relied on HER data and limited information relating to local lists provided

by some Local Authorities. HERs historically evolved from an archaeological database run and operate at county and in some cases district or unitary authority level. As a result, HERs can contain different formats of data and recording standards. This is particularly relevant when using HERs as the sole means to identify non designated historic buildings and structures as many HERs were not set up originally to record, map and assess built heritage, meaning that a large number of buildings of historic merit that will be impacted by the proposed route alignment may not have been identified or assessed.

- 7.3.11. As a result, the HER data relied upon to assess NDHAs relates in the main to archaeological finds and has little bearing on the assessment of above ground built heritage assets. As these 'assets' will not be impacted by the proposed scheme, they are subsequently scoped out from further investigation in accordance with the criteria set out by the Planning Act, but this conclusion is both inaccurate and misleading. In addition, where built NDHAs have been included, assessments of settings have not been undertaken meaning that a proper impact assessment of the Project on the NDHAs within the 250m study area has not been completed. It should also be noted that just because an asset is not designated doesn't mean it doesn't meet statutory requirements unless evidenced.
- 7.3.12. The result of this widescale dismissal of the known heritage assets along the preferred route has led to a mere 458 designated assets being considered as impacted as a result of either temporary or permanent change to their settings, which will be taken forward for further consideration in an ES as part of the DCO. This represents only 5% of the entire designated heritage asset stock that is present within the 5km buffer (on which the ZTV is based), and 12% of the total number of designated assets identified by Fuller Long HEA within the study areas dictated by NGET.
- 7.3.13. With regards to non-designated heritage assets, of the remaining 1273 NDHAs within the study area, only 175 are being taken forward for further assessment. NDHAs that will be severely impacted as a result of the operational effects of the 50m pylons within 250m have not been assessed and none are being taken forward for further assessment within the ES.
- 7.3.14. This methodology is in direct contravention of National and Local Policy, and is contrary to consultee responses which requested full justification for all buildings being scoped out based upon professional judgement, either within the appendix or within the main body of the report.
- 7.3.15. The consultee response made by Historic England to the Scoping Report clearly stated that *'it would be key ... to approach the Local Planning Authorities and heritage consultees to ensure that all non-designated heritage assets as well as the settings of the most important and relevant designated heritage assets are properly considered.'*

In addition, Historic England commented that *'before scoping out these heritage assets, an assessment of the area in which they are located, what is special about it, and the contribution it makes to the asset will be required to understand the reasons why they are not to be considered. Dismissing them on type and description only is not appropriate...there also does not seem to be an approach for historic*

landscapes in this section. This is an omission and we recommend the applicant would need to detail the approaches to assessing these important features along the route'.

- 7.3.16. The repeated use of the statement 'setting does not extend to draft order limits' within the HEBR appears to be based on a desk based assessment only and therefore does not provide a 'full justification' for the buildings being scoped out.

ASSET TYPES AND ASSESSMENT

- 7.3.17. Heritage assets throughout the study area are described and are ascribed value according to a basic tabulated formula and sometimes are identified as having historic, aesthetic, evidential or communal values in line with Historic England Guidance. However, this is not consistent and seems to vary from asset to asset.
- 7.3.18. The heritage assets within the 2 km and 3 km study areas are listed in the Appendix 11.1: Historic Environment Baseline Report in Volume III. This report groups assets according to geographical area and chronological period rather than according to type. As stated above, a huge amount of information corresponds to HER data which lists archaeological finds that are not relevant to this assessment and serve only to complicate and lengthen the analysis.
- 7.3.19. The PEIR states that the assessment of each asset within the HEBR is based upon desk based study which provides an opinion on whether it is considered that the DOL forms part of the setting of each asset. Potential views of the tall infrastructure are largely ignored.
- 7.3.20. The remaining buildings that are not scoped out are included in the PEIR for further assessment. Out of a total 2117 buildings assessed as part of the HEBR, around 79% have been scoped out. From an initial review carried out by Fuller Long, this would appear to encompass almost every asset beyond 500m of the DOL.

Non Designated Heritage Assets (NDHAs)

- 7.3.21. A huge number of archaeological finds listed by the HER data are referenced as NDHAs within the baseline assessment. Identification of above ground built heritage assets are sporadic and based on limited information. The settings of these NDHAs are not assessed (despite all of them being located within 250m of the DOL) and an impact assessment of the Project once constructed upon these assets and their settings has not been undertaken as part of the HEBR.

Designated Heritage Assets

Listed Buildings

- 7.3.22. Listed buildings have been identified according to the National Heritage List (NHL) and are assigned value according to their gradings (grade I and II*- High, grade II- medium). The assets are described using the NHL listing descriptions - HE values (evidential, historic, aesthetic, communal) are sometimes

also attributed, although this is not consistent and are merely stated without qualification. A setting assessment also forms part of the baseline for each asset which generally provides a description of the features surrounding the building, and features such as vegetation and buildings that potentially provide screening from the 50m high pylons and wirescape. Sometimes, views are analysed towards the proposed tall infrastructure but this is not consistent. The distance of the asset from the DOL is also provided in most cases, but not all which leads to a lack of understanding. Almost every asset is assessed as having a setting that does not extend to the DOL – a subjective decision based limited information derived from a desk based study only. Those that are scoped in are almost all within 500m of the DOL.

- 7.3.23. Curtilage listed buildings have not been identified or assessed as part of the baseline assessment.

Scheduled Monuments

- 7.3.24. Scheduled monuments are assigned as high value assets and are described according to NHL and HER information. The setting of the scheduled monument is sometimes described (though this is not consistent) and is generally based upon the surrounding topography and intervisibility with other features – the DOL rarely forms part of the setting of a scheduled monument, even when there are views directly towards the high infrastructure. From an initial review undertaken by Fuller Long, no scheduled monuments beyond 500m appear to be scoped in for further assessment.

Registered Parks and Gardens

RPGs are assigned value according to their grading (grade I and II*- High, grade II- medium). An assessment of each Registered Park and Garden often appears to relate to other assets within the RPGs, rather than providing an assessment of their significance as an historic landscape in their own right. Sometimes, reference is made to a landscape designers. A basic assessment of the setting of each RPG is also provided, though this tends to relate to the interrelationship between elements inside the park rather than the wider landscape contributing to the setting of the RPG. Views are sometimes also assessed but this is not consistent. All RPGs (bar one – Langleys, which is adjacent to the DOL) were scoped out of further assessment as their settings were not consider to extend to the DOL. The assessments are based on subjective decisions using limited information derived from a desk based study only. The initial review undertaken by Fuller Long HEA suggests that the potential visibility of the pylons from within the RPGs was not assessed, and therefore views of the tall infrastructure was not considered to harm the settings or significance of the RPGs.

Conservation Areas

- 7.3.25. An assessment of conservation areas is included within chapter 3 of the baseline report, but these assessments are not consistent and often have not adequately considered the character and appearance of these designated assets, listing instead the listed buildings which are to be found and any key views associated with the village/area. In most cases, the setting of the conservation areas is considered to make a considerable contribution to their value (although this is not explained or defined

further). Of the 54 conservation areas within the study area, 41 have been scoped out as this setting is not considered to extend to the DOL. This appears to largely be based upon subjective opinion which has attributed a medium value to each area with no apparent reasoning. Conservation Areas only appear to be scoped in as a result of proximity to The Project, rather than as a result of following the 5 step process as recommended by Historic England in GPA3.

Summary

- 7.3.26. The HEBR has undertaken a baseline assessment of the heritage assets located within the study area as proposed by the Scoping Report, on a case by case basis as prescribed by the Scoping Opinion. However, the assessment methodology was based on a desk based study alone which provided inadequate information that was flawed and inconsistent and does not give due consideration to the settings of the heritage assets surrounding the DOL. It would appear that almost all of those assets taken forward for further consideration in the PEIR were entirely as a result of their very close proximity (less than 500m) to the line rather than as a result of adequate assessment of their settings as prescribed by GPA3, or as a result of views of the tall infrastructure that will be experienced from within the setting of those assets.
- 7.3.27. The settings of listed buildings were generally assessed as not extending beyond the immediate vicinity of the asset, and in almost every case are not considered to extend to the DOL due to topography, intervening infrastructure and vegetation. This is contrary to many of the responses to the non-statutory consultations being provided which clearly state that the tall infrastructure will not only be visible from the listed building, but that the beautiful and tranquil landscape that contributes towards the special interest of the heritage assets will be substantially impacted and harmed as a result of The Project.
- 7.3.28. Inaccurate assessments of Heritage Assets throughout the study area, due to the wrong data being evaluated or as a result of inadequate significance and settings assessments are rife throughout the PEIR. Case Studies are included within chapter 9 of this report. These examples demonstrate inadequate information on which the scoping evaluation has been based, which has led to a poor consideration of the significance and setting of each asset. The resulting flawed information consequently leads to the wrong result within the significance matrix, with the result that the majority of the heritage assets within the study areas will not be taken forward to the ES for detailed assessment.

7.4 PROPOSED MITIGATION

- 7.4.1. Mitigation for the Project has been subdivided into three separate headings:
- Embedded Mitigation – built into the design of the Project including routeing and undergrounding
 - Standard Mitigation – management of archaeological investigations or replacement of hedgerows

- Additional Mitigation – any additional works identified to reduce significant environmental effects such as archaeological recording.

7.4.2. As is clearly articulated within the tables of the PEIR, there is no proposed mitigation for those assets which will be negatively impacted by the scheme. The only mitigation that will preserve the historic environment is to underground the line. Hedges and tree belts do not mitigate the impact of the tall infrastructure. NGET confirms within the PEIR that the undergrounded sections of the line (at Dedham Vale and in the Waveney Valley Alternative) will preserve all of the affected heritage assets in the area.

7.5 COMMUNITY AND CONSULTEE REPONSES

7.5.1. In accordance with section 49 of the Planning Act, the applicant must have regard to relevant responses to publicity and consultation and prepare a consultation report demonstrating how the proposed application has been amended to take account of the relevant responses;

7.5.2. In addition, applicants are required under section 37 of the Planning Act to produce a consultation report alongside their application, which details how they have complied with the consultation requirements set out in the Planning Act and how the proposed application has been shaped as a result.

7.5.3. Section 51 requires a description of how the proposed application for submission has been informed and influenced by community and consultee responses, showing any significant changes made to the proposals as a result as a result of the consultations, and provide an explanation as to why any responses advising on changes to a proposed project, including advice from statutory consultees and local authorities on effects, were not followed.

7.5.4. Two non-statutory consultations have been undertaken. The first received 3787 responses and the second 4167 responses, most of which highlighted heritage impact as an objection to the project. The applicant has stated in the 2024 PEIR report that all of feedback provided was considered and taken into account in the context of environmental and socio-economics constraints and opportunities, engineering feasibility and cost, and planning policy considerations.

7.5.5. Within the PEIR report (2024), the applicant has confirmed that those heritage assets that have been brought to their attention as part of this consultation process have been considered, and then dismissed as not meeting the criteria as set out by the scoping study or as a result of the flawed desk based settings assessment.

7.5.6. A total of six changes were made to the preferred draft alignment as a result of this consultation. One, the realignment of the line between RG195 and RG200 after the 2023 non-statutory consultation to avoid oversail of an equestrian business, moved the line to within 50m of a grade II listed house, Bleak Hall (1251669), thus significantly increasing the harm to this designated asset which hadn't previously been considered.

7.6 ZONE OF THEORETICAL VISIBILITY

- 7.6.1. A Landscape and Visual Impact Statement (LVIA) included a Zone of Theoretical Visibility (ZTV) which covered a 5km swathe along the preferred route. Research by statutory consultees has suggested that 7km would be more appropriate. The ZTV serves as an illustration to indicate how the pylons will affect the preliminary settings (ie. whether the pylons will be visible) of the heritage assets along the route. The ZTV maps in PEIR Vol. II: Figures (13.8.1 – 13.8.11) show that the pylons will be theoretically visible from almost all of the identified heritage assets within the 5km swathe.
- 7.6.2. It is of note that within the submission, only a 'screened' ZTV has been submitted and not a 'Bareground' ZTV. As such the impact that the development would have should intervening buildings or vegetation be removed has not been assessed.
- 7.6.3. The PEIR states that the ZTV has not informed the decision making process as part of this statutory consultation, but will be included as part of the ES next year. The visibility of the tall infrastructure from the heritage assets along the route has therefore not been taken into account as part of the PEIR, and over 75% of heritage assets have therefore been scoped out without due consideration of impact to views upon the significance and settings of these assets.

Section 2: Heritage Assets

Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations

Paragraph 195 of the NPPF (2023)

7.7 IDENTIFIED HERITAGE ASSETS

- 7.7.1. Based on data collated from a GIS survey undertaken by Fuller Long HEA, analysis of data sets indicates that approximately 3775 heritage assets are present within the defined study areas as identified in the Scoping Report of 2022 (Appendix 11.1 Historic Environment Baseline Report at Volume III). Of these, 131 are grade I, 288 are grade II* and 3221 are designated at grade II.
- 7.7.2. There are also are 12 Registered Parks and Gardens, 72 Scheduled Monuments, 51 Conservation Areas and numerous NDHAs.

CONSIDERATION OF THE ISSUES

Assessment

- 7.7.3. The sheer scale of the built heritage along the preferred route of the Norwich to Tilbury Line means that the assessment of their importance has been reduced to statistics, with inadequate assessment of the significance or the contribution made by their setting (as required by paragraph 200 of the NPPF) or as outlined in the method statement for the HEBR. Whilst the Scoping Report identified a Study Area which has widely been adopted, the wholesale scoping out of over 3000 assets within that study area on the basis of what appears to be proximity to the DOL only, means that a vast number of nationally and locally important heritage assets will not be put forward for proper assessment to the ES next year.
- 7.7.4. It is believed that the number of heritage assets impacted by the proposed scheme is also likely to be higher than suggested by NGET. The Planning Inspectorate recommended that the extent of the study areas should be established in accordance with recognised professional guidance and best practice, whenever this is available, and determined having regard to the extent of the likely impacts. The study areas should also have been agreed with relevant consultees, who widely responded in the first non-statutory consultation that they welcomed the use of an LVIA and ZTV to assess the baseline setting of heritage assets. Historic England also responded that *'in addition to the built environment, it is important to understand designed landscapes as a "cultural asset" and the impact upon the views is an important part of the historic environment in its own right'*. Historic England went on to say that it would be key to approach the Local Planning Authorities and heritage consultees to ensure that all non-designated heritage assets, as well as the settings of the most important and relevant designated heritage assets, are properly considered on a case by case basis, as well as the settings of heritage assets within urban settings which are currently scoped out of further assessment by NGET within the PEIR.
- 7.7.5. Despite consultee concerns to the EIA scoping report (2022), NGET has retained the study areas for the historic environment at 250m for NDHAs, up to 2km for designated assets listed at grade II and up to 3km for designated assets of the highest significance (grade II* and grade I) despite the ZTV showing that the tall infrastructure will be theoretically visible to all of the assets up to 5km. NGET considers that the study areas are *'appropriate based on the potential effects of this Project on heritage assets,*

including consideration of physical impact and impacts arising through change to setting from tall infrastructure, the study areas and approach to ZTV for landscape and visual, professional judgement and previous experience of similar projects'.

- 7.7.6. However, an assessment of the impact of views towards tall infrastructure from heritage assets and their settings is lacking in all of the reports provided by NGET, as the information on which to base a professional assessment has been restricted to desk based analyses and aerial images only to date. Consequently, the repeated statement that the setting of a heritage asset does not extend to DOL is flawed, as it does not take into consideration the impact of views upon setting as set out by Historic England GPA3 (section 6.2 above).
- 7.7.7. In addition, whilst professional judgement has been employed in the HEBR, it is clear that the baseline assessments were undertaken by a number of different individuals which has led to a lack of consistency, a variation of quality and numerous mistakes throughout the DBA.
- 7.7.8. Thus in addition to the c.1650 heritage assets that were scoped out from any assessment whatsoever (as a result of meeting the scoping criteria in section 11.5 of the PEIR), an additional c.1650 have been scoped out following the HEBR assessment on the basis that their settings do not extend to the DOL. The PEIR states that the scoping of the survey area was conducted in early 2023 using a holistic understanding of the current site conditions, informed by what is visible on the aerial imagery, and recorded heritage assets, along with professional judgement. This is wholly inadequate – the description for heritage assets within the National Heritage List for England with the identification of a building on an aerial image does not provide a professional with enough information to assess the significance of the building or place, the topography, the surrounding landscape or views to and from the proposed infrastructure.
- 7.7.9. Other assets that were instantly scoped out without a proper assessment include those separated from the scheme by other major infrastructure (e.g., motorways, major dual carriageways, active mainline railways) where it can be reasonably concluded that the infrastructure is a pre-existing barrier that the setting of a building would not extend beyond. The pre-existing infrastructure described is naturally low lying in comparison to the very tall infrastructure being proposed, and whilst in some cases the presence of roads or railways has substantially changed the settings of some assets, they should not be scoped out without an initial on ground assessment on a case by case basis to demonstrate that the proposed scheme will not cause more harm to the heritage asset. Indeed, it can be argued that previous harms do not nullify further harm to an asset and may indeed result in further compound harms that further reduce significance.
- 7.7.10. The largest number of heritage assets scoped out from further assessment were those where settings are considered not to extend to the Project. This has been evaluated through an assessment of setting and value in the Desk Based Assessment of the HEBR. This is an entirely inadequate process for assessing the significance of the thousands of heritage assets and their settings along the proposed route of the

Norwich to Tilbury Line. A Desk Based Assessment using aerial imagery does not convey the many nuanced facets of settings that contribute towards the significance of listed buildings, conservation areas, registered parks and gardens, scheduled monuments and locally listed buildings.

Methodology

7.7.11. NGET has stated in the scoping report of 2022 that the contribution of the setting to the value of heritage assets would be assessed in accordance with the guidance provided in the Historic Environment Good Practice Advice Planning Note 3: The Setting of Heritage Assets (Historic England, 2017), and subsequently guidance specific to the historic environment within the PEIR included:

- Standard and guidance for historic environment desk-based assessment (Chartered Institute for Archaeologists (CIfA), 2014, updated 2020)
- DMRB LA 106 Cultural Heritage Assessment (National Highways et al., 2020)
- Conservation Principles Policies and Guidance for the Sustainable Management of the Historic Environment (Historic England, 2008)
- Managing Significance in Decision-Taking in the Historic Environment. Historic Environment Good Practice Advice in Planning: 2 (Historic England, 2015)
- The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (Historic England, 2017)
- Statements of Heritage Significance: Analysing Significance in Heritage Assets. Historic England Advice Note 12 (Historic England, 2019)
- Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (ICOMOS, 2011)
- Principles of Cultural Heritage Impact Assessment in the UK (IEMA, IHBC, CifA, 2021)

7.7.12. Putting archaeological desk based assessments aside, none of the guidance relating to built heritage provided by Historic England, ICOMOS or IHBC suggests that a desk based study is a robust way to assess the significance of any built heritage asset of any grade. Rather, the guidance listed widely recommends that a number of factors need to be considered before coming to a conclusion about ascribing significance to a place. Only by assessing '*what is important and why*' about each of the identified heritage assets can a reasoned understanding of a heritage asset be established together with how the asset is experienced. As stated by IHBC guidance (referenced within NGET literature):

7.7.13. 'Although cultural significance will be embodied in the physical components of a cultural heritage asset, it may also be derived from remote and less tangible characteristics. These could comprise, but are not limited to: former or current use, associations, meanings, records, related places and the character, appearance and historical development of its setting, together with related objects within its setting.'

A critical element of understanding cultural significance relates to how the cultural heritage asset is experienced.

- 7.7.14. At its most obvious, adverse impact on cultural significance can come from total or partial loss of a cultural heritage asset through alteration or destruction. Also, it can be the result of change within the setting of a cultural heritage asset that prevents an aspect of cultural significance from being experienced, [or from] impact on the character and appearance of the setting.'
- 7.7.15. Chapter 3 of the PEIR provides the methodology for the HEBR. As part of this walkover surveys are listed as providing information to assist the assessment of the settings of Heritage Assets. Walkover Survey actually relate to archaeological assets only and were not used to assess built heritage assets. Walkover surveys cannot therefore support the baseline heritage assessment: photographs within the technical appendices of volume III of the PEIR illustrate that principally, only fields have been assessed rather than settings. Wireline visualisations in Volume II of the PEIR likewise are taken from viewpoints of landscapes that do not involve heritage assets (Save for St Marys Church, Buttsbury and Langleys). The walkover surveys and wireline visualisations therefore do not contribute to an assessment of the impact to the identified built heritage assets within the study area.
- 7.7.16. Paragraph 11.5.24 of the PEIR states that The HEBR focused upon:
- a) Detailing the desk-based baseline for the historic environment
 - b) Providing a robust assessment of the value of all heritage assets included within the baseline at this time.
 - c) Assessing the setting of heritage assets scoped into the assessment as per the approach detailed in the EIA Scoping Report (National Grid, 2022) and identifies as to what degree the setting contributes to the value of the heritage asset.
 - d) Presenting the heritage baseline in the form of an appended cultural heritage gazetteer supported by figures and photographs where appropriate,
- 7.7.17. With regards to (b), it is contested that assessment has not undertaken a robust assessment of any Heritage Asset. A DBA using aerial imagery and HER data does not provide a robust assessment.
- 7.7.18. With regards to (c), the Planning Inspectorate has already stated that the approach adopted by the EIA Scoping Report in paragraph 11.10.18 could not be accepted without further consideration of the significance of heritage assets and the contributions made by their setting on a case-by-case basis.
- 7.7.19. With regards to (d), a cultural heritage gazetteer with figures and photographs is yet to be produced.
- Statutory Obligations**
- 7.7.20. There is a statutory obligation on decision-makers to have special regard to the desirability of preserving listed buildings and their settings. An in-depth assessment of the non-designated and designated assets

is required. An understanding of the contribution that the setting makes to these assets is mandatory. As stated by Historic England GPA 3 (The Setting of Heritage Assets), a setting includes views of or from an asset, but other important factors include *'the way in which we experience an asset such as noise, dust and vibration from other land uses in the vicinity and by our understanding of the historic relationship between places'*. It is not possible to assess these aspects from aerial imagery and HER data alone.

- 7.7.21. The lack of understanding of the historic environment along the proposed route of the Norwich to Tilbury line has led to ill-informed decisions, firstly with regards to the routing strategy of the CPRSS and later with regards to the assessment and scoping out of assets within the PEIR. Following feedback from the non-statutory consultations in 2022 and 2023, this lack of understanding has guided decisions to relocate the line away from some assets towards others of equal or greater significance (eg. from Ingatestone Hall to St Marys Church, Buttsbury) or even next to assets that NGET appeared unaware of (Bleak Hall). these examples will be considered in the Case Studies in section 9 of this report. It is therefore believed that if the findings of the desk based approach are adopted, significant harm to the historic environment of Essex, Suffolk and Norfolk will be caused in contravention of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF (2023) and Local Plans throughout the region.
- 7.7.22. Paragraph 2.8.9 of the National Policy Statement EN-5 (Electricity Networks Infrastructure) highlights that the 'Government has not laid down any general rule about when an overhead line should be considered unacceptable, but the applicant should consider the landscape in which the proposed line will be set, (in particular, the impact on residential areas, and those of natural beauty or historic importance such as National Parks, AONBs and the Broads);
- 7.7.23. In addition, paragraph 2.2.10 states that applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to "have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and ...do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects."
- 7.7.24. Even if the 79% of assets that have been scoped out of further assessment are disregarded, the 123 assets which have been scoped in are identified as being impacted by significant negative permanent effects (or substantial harm). No mitigation has been put forward for the harm within the PEIR, and as such, undergrounding (and specifically HVDC undergrounding) the line is the only option which will preserve the significance and setting of these heritage assets for future generations. Given case law that sets out the importance of assessing alternatives to minimise heritage harm, it is essential that alternative solutions are explored to preserve the heritage environment surrounding the proposed infrastructure.

- 7.7.25. This Objection Statement therefore claims that NGET has failed to undertake a proportionate and thorough assessment of the numerous heritage assets along the route of the proposed pylon route, which has resulted in the scoping out of thousands of buildings and places based on a lack of adequate data in contravention of professional best practice and guidance provided by Historic England, ICOMOS and IHBC.

Section 3: Grounds for Objection

8 GROUNDS FOR OBJECTION

8.1 METHODOLOGY

Summary

- 8.1.1. It is considered that the methodology employed by Norwich to Tilbury to assess the significance and setting of the heritage assets along the proposed route of the tall infrastructure is inadequate and has provided flawed results leading to erroneous conclusions for thousands of heritage assets.
- 8.1.2. A desk based study without proper evaluation of the setting of the heritage assets by site visits undertaken by professionals has led to the scoping out of the vast majority of the assets in the area surrounding the Project.
- 8.1.3. The PEIR states that the Historic Environment Baseline Report was prepared by a Desk Based Assessment in accordance with the specification directed in the Standard and guidance for historic environment desk-based assessment (ClfA 2014, updated 2020). This guidance is primarily for the assessment of archaeological assets, and is not suitable for the assessment of the historic built environment, which should be informed by Historic England Guidance the Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Historic England, 2017). Whilst this guidance is quoted later in the reports providing guidance for the preliminary assessment within the PEIR, no evidence has been provided to show that a staged approach to proportionate decision-taking was undertaken, beyond a subjective decision based upon extremely limited data. The lack of a reasonable assessment of the assets has led to poor data and incorrect assumptions being used to provide an assessment of the impact of the Project, which has led to an entirely incorrect assessment of the harm caused to the assets as a result of the proposed tall infrastructure.

Scoping Exercise

- 8.1.4. The scoping criteria described within the PEIR is too broad and allows for subjective decisions to be made about the settings of heritage assets without consideration of the visual impact of the tall infrastructure. Heritage viewpoints and the ZTV are yet to be considered as part of the environmental impact of the scheme.
- 8.1.5. Many assets which will be severely impacted by the Project will not be taken forward for assessment as they fail to meet the study area criteria, or their settings fail to reach the DOL.

Heritage Environment Baseline Report

- 8.1.6. The assessment of heritage assets is based on inadequate information provided by a desk based study only. The guidance provided by Historic England in Conservation Principles, Policies and Guidance and Good Practice Advice 2 and 3 has not been adequately followed with the result that the significance of assets has been glossed over and their settings based upon aerial imagery only.

- 8.1.7. The opinion within the gazetteer of the PEIR regarding the setting of an asset extending to the DOL is entirely subjective and does not appear to have been based upon evidence gathered during site visits.
- 8.1.8. The lack of assessment of the impact of the Project once constructed on NDHAs within the 250m buffer is in contravention of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the NPPF (2023).
- 8.1.9. The subsequent scoping out of over 79% of the identified Heritage Assets within the study areas is therefore flawed and substantial harm will be caused to the historic environment as a result.

Preliminary Environment Investigation Report

- 8.1.10. The PEIR states that the baseline (HEBR) provides a robust assessment of the value of all heritage assets included within the baseline at this time. In reality, only the most basic and brief assessment of significance and setting of the scoped in listed buildings has been undertaken, which does not include anything bar the most perfunctory use of aerial images and heritage list descriptions. This method does not and cannot provide an adequate understanding of the impact of the proposed scheme upon the special interest of these assets, in contravention of s66 of the Planning (Listed Buildings and Conservation Areas) Act and paragraph 208 of the NPPF, which states

'Conservation decisions are based on a proportionate assessment of the particular significance of any heritage asset that may be affected by the proposal, including by development affecting the setting of a heritage asset'.

- 8.1.11. GPA3 goes on to say that a simple check list approach may be suitable for single assets, but that for developments that involve multiple assets or significant assets, a more detailed approach to analysis will be required. It is acknowledged that complex forms of analysis such as viewshed analyses, sensitivity matrices and scoring systems can assist analysis to some degree, but that as setting and views are matters of qualitative and expert judgement, they cannot provide a systematic answer.
- 8.1.12. Historic England recommends that, when submitted as part of a Environmental Statement, 'technical analyses of this type should be seen primarily as material supporting a clearly expressed and non-technical narrative argument that sets out *'what matters and why'* in terms of the heritage significance and setting of the assets affected, together with the effects of the development upon them'.
- 8.1.13. The PEIR lists the additional data that will be assessed for the ES for the remaining listed buildings which have been scoped in as part of the baseline assessment. This proposes an assessment of aerial photography and historic maps, but crucially does not included site visits which are an essential component for assessing setting. The proposed methodology for assessing setting as part of the ES therefore falls far short of the industry standard. The setting of heritage assets as defined by Historic England GPA3 cannot be analysed by a desk based assessment alone.

- 8.1.14. The PEIR assigns a level of impact upon the remaining scoped in assets that are considered to have settings that extend to the DOL. This process is undertaken on a quantitative basis using matrices to allocate value and magnitude of impact, resulting in an overall assessment which quantifies the impact as follows:
- Not significant positive effect – from undergrounding/dismantling existing infrastructure
 - Neutral effect – no harm to the significance or setting of the asset is considered to exist
 - Not significant negative effect – Less than substantial harm to the significance or setting of the asset is considered to exist
 - Significant negative effect – Substantial harm to the significance or setting of the asset is considered to exist.
- 8.1.15. This process is not appropriate for assessing impact to all heritage assets. The assessment is restricted to those assets whose settings are considered to extend to the DOL and therefore all theoretically will be substantially impacted by the presence of the neighbouring 50m high pylons.
- 8.1.16. The impact associated with many of the assets has also been found to be based on wrong information, and the level of impact varies between that stipulated in the HEBR and the PEIR. The outcome of the assessment is therefore incorrect and many assets have been scoped out of further assessment within the ES without proper consideration. It therefore follows that the impact of the scheme has not been properly assessed and the suggestion that the preliminary assessment of the PEIR can determine significant positive, negative or neutral effects is fundamentally flawed.

ZTV and Visual Impact Assessment

- 8.1.17. An assessment of the ZTV and Heritage Visual Viewpoints has yet to be undertaken. It follows therefore that the visual impact of the tall infrastructure has not been properly considered as part of the NEBR and PEIR. Views are often integral to the setting of heritage assets, and the omission of the impact of the Project upon views of almost all of the heritage assets at this stage neglects a vital component of the contribution that setting makes to a heritage asset.
- 8.1.18. The lack of this analysis also means that listed buildings whose settings have been assessed as not extending to the Project which might have *'a historical and/or functional relationship with a scoped in building within the study areas or where LVIA indicates the Project would be a prominent visual feature within the landscape'* have not been identified. In addition, those assets that *'exist where topography allows for more distant views which prove the exceptions'* from being scoped out have also not been identified.

Mitigation

- 8.1.19. No mitigation has been put forward for those assets identified as experiencing substantial or less than substantial harm. NGET has generally responded negatively to stakeholder consultation about moving

the line to reduce impact upon heritage assets as the impact is simply moved to other highly significant heritage receptors. The option of undergrounding in accordance with Paragraph 2.9.25 of National Policy Statement EN-5 should be considered in these cases as an alternative which would remove the substantial harm inflicted by the proposed infrastructure. In particular, the option of High Voltage Direct Current (HVDC) being undergrounded has not been explored at all. This option is economically viable and substantially reduces the impact of the Norwich to Tilbury line on almost all of the heritage assets within the study areas and the ZTV, meaning that the need for mitigation would be negligible.

8.2 LEGISLATION

8.2.1. The lack of information provided by a desk based study has led to an inadequate and often incorrect assessment of the significance and setting of the heritage assets along the preferred Norwich to Tilbury Route. This is in contravention of the Planning Act 2008, The Levelling Up and Regeneration Act 2023, The Energy Act 2023, The Electricity Act 1989, The Planning (Listed Buildings and Conservation Areas) Act 1990 and the NPPF 2023.

Summary

8.2.2. In summary, the following principal grounds for objection are raised:

- Failure to meet statutory obligations and compliance. For example, a failure to undertake assessment work that can adequately meet the needs incumbent on the scheme to have special regard to the 'desirability of preserving listed buildings and their settings' and, as a result of a failure to adequately understand significance of a heritage asset, the likely consequential impact of failing to meet the requirements of the NPPF to give 'great weight..... to an asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'
- Failure of the methodology employed to provide a sufficiently robust assessment of the heritage resource, its significance and the potential for the proposed scheme to result in harm to the significance of individual heritage assets as well as the aggregated significance of groups of heritage assets and their settings.
- Failure to undertake a sufficiently robust assessment of the validity of desk-based assessment through full and appropriate 'on site' assessment and ground truthing of the heritage resource.
- Failure to address methodological concerns raised by consultees during scoping. For example Historic England identified a number of areas that needed to be addressed. These included the importance of recognizing and understanding designed landscapes, and associated views, as "cultural assets" in their own right; the need to properly consider heritage assets 'on a case by case basis', as well as the need to address the settings of heritage assets within urban settings (scoped out of the scoping report).

- Failure to adequately justify the arbitrary use of distance and designation grade to scope out heritage assets from assessment (i.e. 250m for NDHAs, up to 2km for grade II designated assets and up to 3km for designated assets of the highest significance). This approach will not establish a proportionate undertaking of the potential level of harm. In addition the use of a ZTV in scoping has clearly indicating that the height of proposed infrastructure will be theoretically visible to all assets up to and potentially beyond 5kms.
- Failure to identify how setting(s) contributes to the significance of identified heritage assets, in what way and to what degree. It is noted that setting does not equate to intervisibility but the understanding and appreciation of an asset or assets – including at a landscape level. Unless the contribution of setting is qualified and well as quantified, it is impossible to meaningfully understand which assets and in what way and to what degree will be harmed by the proposed scheme.

9 CASE STUDIES

- 9.1.1. As part of this objection, a number of site visits by Fuller Long HEA were undertaken to assess the significance of heritage assets and their settings within the study area of the proposed Norwich to Tilbury line. It is not possible to check the accuracy of the assessments made of all of the assets included in the baseline report, but the examples below provide a cross section of historic places, from those afforded the greatest significance due to their exceptional interest (grade I), to those buildings which are particularly important (graded II*) and the majority of buildings graded for their special interest (grade II).
- 9.1.2. Each Case Study will include the impact assessment provided by NGET within the PEIR together with the predicted impact and proposed mitigation. An heritage assessment will then be provided by Fuller Long for each asset, highlighting the inaccuracies of the NGET desk based assessments.
- 9.1.3. The case studies serve to illustrate the inaccuracies and inconsistencies of the HEBR underlining that a desk based assessment is entirely inappropriate method for properly assessing the significance of heritage assets along the route, and the contribution made by their setting. The final two case studies highlight in more detail how the lack of due process has led to the wrong conclusions about the impact of the scheme on the significance of the historic environment.
- 9.1.4. The case studies also illustrate how a tabulated assessment within the PEIR to assess the qualitative significance values and level of impact is also flawed.
- 9.1.5. In each case, the impact of the proposed infrastructure is assessed as causing harm to the setting and significance of the assets. The preservation of the historic listed buildings, conservation areas, registered parks and gardens and scheduled monuments can only be achieved by the HVDC undergrounding of the Project, in accordance with the legislation and case law outlined above.

FLORDON HALL (1050698), PIGGERY (FORMERLY DOWER HOUSE) (1172231), BARN (1373055) AND FARMSTEAD, FLORDON, NORFOLK



View looking north-west towards Flordon Hall. The Pylons will be highly visible in the background, just 200m beyond the grade II* listed building.

Location: 200m from DOL

NGET ASSESSMENT OF SIGNIFICANCE AND CONTRIBUTION OF SETTING

"The high value Grade II 'Flordon Hall' (1050698) and the medium value Grade II assets 'Piggery 60 Yards South of Flordon Hall' (1172231) and 'Barn to Flordon Hall' (1373055) are located in a former farmyard 600 m north-east of Flordon Road, 600 m north-north-west of Flordon and 200 m south-east of the draft Order Limits. These assets are of evidential and historical value. The former farm complex is accessed by a private road off Flordon Road. The Hall (1050698) bears arms on the porch of Robert Kemp and Dorothy née Harris and so was likely constructed between 1595 and 1612. The structure is underbuilt rendered timber frame with a brick porch and brick gables to the wings and plain and pantile roofs. There has been limited 19th and 20th century alterations and additions. The barn (1373055) was built in the 17th century and comprises a weather boarded timber frame structure with a corrugated asbestos roof. The piggery (1172231) was possibly built as a dower house to Flordon Hall around 1600. It is brick built and has a corrugated asbestos roof.*

The setting of the assets is shared and is informed by the relationship between the designated assets and their relationship with the other later elements of the farmyard. This setting is further informed by the surrounding agricultural landscape with which the assets have a functional and historical relationship. The hall is situated to the north of the other farm buildings within mature, tree lined grounds with lawned areas and a kitchen garden. The setting of the assets instils a sense of seclusion and privacy and promotes an understanding of the farming industry. This setting, therefore, makes a moderate contribution to the value of the assets, and due to proximity and inadequate screen, it extends to the draft Order Limits.

The farmyard, where are located the Grade II barn to Flordon Hall (1050698) and the Grade II Piggery 60 yards south of Flordon Hall (1172231), is visible from the draft Order. As for the Flordon Hall (1050698), it is not visible due to a tree line to its west.

ID Number	Name	Grade	Value	Operational Effects	Mitigation	Significance of Effect
1050698	Flordon Hall	II*	High	The Project would introduce tall infrastructure within the setting of the asset, causing a moderate change to the rural aspect of the asset's setting, which makes a minor contribution to its value	There is no suitable mitigation to reduce this effect	Significant negative effect

Significance

List description, Flordon Hall, grade II*:

Farmhouse. Arms on porch of Robert Kemp and Dorothy née Harris thus 1595 - 1612. Rendered and underbuilt timber frame with a brick porch and brick gable-ends to wings. Some C19 brick facing to side and rear. Plaintiled and pantiled roofs. Symmetrical E plan. 2 storeys and attics. Polygonal angle buttresses with moulded stone finials to porch and wings. Porch with ovolo-moulded semi-circular headed arch contained within an ogee-moulded flat-headed surround and surmounted by a moulded pediment. Fenestration mainly C19 and C20 beneath segmental arches; however, 3 original blocked window openings in gables beneath plain rectangular hood-moulds and one surviving 5-light window to north with ovolo-moulded mullions and transom, saddle bars and some diamond glazing. Some similar blocked frames visible inside only. Some diapered brickwork. External stacks to rear and to side wings with octagonal shafts. Interior . High quality timber frame with close studding, some moulded jowls and some ovolo-moulded principal beams. Several original doors of panelled and planked types with decorative H hinges and catches with loop-drop handles. Staircase at either end of main block with original treads at northern end only. Original principal rafter roof.

Pevsner:

Flordon Hall. Red brick with blue diapering. On an E plan with polygonal angle-shfts and straight gables. Over the round-arched porch entrance a pediment.

Fuller Long HEA Assessment of Significance

- 9.1.7. The evidence presented in the hall can feed into an understanding of local vernacular building traditions and typologies and sociocultural developments. Notable physical attributes include the timber framed structure with wattle and daub, brick gabled wings and octagonal chimney stacks. The materials associated with the late 16th century provide evidence in building fashion, access to different materials, aspirations, and social status. Archaeological finds around the hall including Bronze age flints and Roman coins. The evidential value is considered to be high.
- 9.1.8. The Hall has stood here since the 12th century and was extended during the reign of Queen Elizabeth I. The core of the property is a timber framed medieval hall which was adapted in the 16th century by Robert Kempe, officer to King Edward VI and Queen Mary. The Hall used to be the court house for the area and is still the seat of the Lord of the Manor but no longer exercised. The manorial estate stretched as far as Mergate Hall (which was owned in tandem with Flordon by the Kemp family in the 19th and 20th centuries) across the land where the Project is proposed. The apple orchard adjacent to the Hall was used to produce some of the first cider for the Gamers family. The artist George Mackley was a regular visitor as a friend of the family and some of his best works depicted life at the hall, including "Threshing at Flordon Hall" from 1943. The historic value is considered to be high.

- 9.1.9. The Hall is an attractive Elizabethan manor house set within formal gardens. The house was built on an E-plan (typical for the Elizabethan age) and provides insight into houses of high status within the medieval and Tudor periods. It is the focal point for the immediate area with one of the best views in Norfolk as described by the Norfolk County Council when they gave it its council banding. Views from the road looking across to the Hall are often photographed and can be seen on the web. The aesthetic value is considered to be high. The hall also has communal value as a focal point and landmark for the village but is in private ownership. The communal value is considered to be low-medium.
- 9.1.10. Flordon Hall faces east towards the village of Flordon and is clearly visible from the village. It is a prominent local landmark. The 17th century grade II former dower house and barn contribute to the setting of the hall, as do the formal gardens, but the wider setting is derived from the manorial estate and apple orchards to the west. There are 8 ponds and about 150 acres of woodland as well as pasture grazed by sheep and acres of wild flower fields. Public footpaths crisscross the farm and are well maintained and used. The village has some great views of the hall and Farm and the view has often been painted.



Norfolk Sheet LXXXVII.NW Surveyed: 1880 to 1882, Published: 1887

Fuller Long HEA Assessment Of Impact

- 9.1.11. The setting of Flordon Hall and Farmyard is intrinsically linked to the surrounding agricultural landscape which has been historically and visually connected with the farm since the 12th century. The agrarian landscape to the north-west of the hall has remained largely unchanged over the centuries and contributes to an understanding of the history of Flordon Hall and its associated farmstead, including the history of cider making in the early 20th century by the Gamers Cider Company.

- 9.1.12. The introduction of tall infrastructure within the landscape so close to the Hall and farmstead will cause substantial harm to the setting of the assets and to the significance of the group value of the farm. All of the listed buildings will experience a significant negative permanent effect as a result of the Norwich to Tibury pylons and wirescape.

Fuller Long HEA Critique Of NGET Assessment

- 9.1.13. Whilst the HEBR concludes that the setting of Flordon Hall is informed by the surrounding agricultural landscape with which the assets have a functional and historical relationship, it affords only a moderate contribution to the significance of the heritage assets, despite the landscape forming the historic manorial estate of Flordon Hall and the farmstead. The operational effects table later states that setting makes a minor contribution to the significance of the heritage assets, illustrating that cross referencing between the original assessment and impact assessment was not undertaken, and much of the wording within these assessment tables was likely copied and pasted.
- 9.1.14. The setting is correctly assessed as extending to the DOL (being only 200m away). The visual assessment undertaken as part of a walkover survey assesses the view of the assets at ground level from the location of the line, which does not provide any context of the impact of the Project on the designated heritage assets. An Actual Visual Representation of the tall infrastructure of the pylons and wirescape in views towards the farmhouse would provide the visual impact of the scheme which would also demonstrate that the tree line to the west of the hall provides little in the way of screening.
- 9.1.15. It is worth noting also that the impact assessment undertaken in the PEIR attributes the hall with a significant negative effect and the barn and piggery with a not significant negative effect, despite them all sharing the same setting. This serves to demonstrate that the use of matrices to assess impact based upon heritage value is a flawed methodology.



View looking south-east towards Flordon Hall and the Farmstead illustrating the agricultural landscape that forms the setting of the Heritage Assets. The pylons and wirescape will dominate views to and from the Listed Buildings, substantially harming their significance and setting.

MANOR HOUSE (1179387) AND CHURCH OF ALL SAINTS (1049992) AND SURROUNDING LISTED BUILDINGS, TIBENHAM, NORFOLK



Manor House – grade II listed (left) and Church of All Saints, Tibenham – grade I listed (right)

Location: 250m and 930m from DOL

NGET ASSESSMENT OF SIGNIFICANCE AND CONTRIBUTION OF SETTING

Manor House:

The medium value Grade II listed 'Manor House' (1179387) is located on the western flank of Diss Road, 1.3 km west of Tibenham and 250 m west of the draft Order Limits. The farmhouse is of evidential and historical value, dates to the 17th / 18th centuries and comprises a plastered timber frame structure with a steep pantile roof.

The setting of asset is informed by its roadside location and by its relationship with associated farm outbuildings some of which are recorded on the first edition OS map of 1884. The setting is further informed by the surrounding agricultural landscape with which the asset and associated outbuildings have a historical and functional relationship. The asset and associated buildings are coherent as a farming complex and the setting makes a considerable contribution to the asset's value. The asset has a largely open view to the Project in the east and so the setting extends to the draft Order Limits".

Church of All Saints:

The high value Grade I listed 'Church of All Saints' (1049992) is located on the southern flank of Church Road, Tibenham, within the Tibenham conservation area, and 930 m west-northwest of the draft Order Limits. The asset is of evidential, historical, and aesthetic value. The church has 11th century Norman roots and there is evidence of 13th, 14th, 15th and 17th century additions and alterations. It is built of flint rubble with stone dressings and has led clad and slate roofs.

"The setting of the church is informed by its roadside location within Tibenham, by its attendant graveyard and by its relationship with the Grade II listed church cottages to the north, Church Farmhouse and associated buildings to the west and Limes Farmhouse to the east (see post medieval section below). The northern boundary of the graveyard is defined by a brick wall fronting on to the church cottage gardens and an evergreen hedge on the northern flank of the cottage gardens. The boundaries to the west, south and east comprise iron railing fences lined with mature trees. The expansion of Tibenham in the 20th and 21st centuries has been limited, and other than some small-scale infill residential development and additions to the Church Farm and Limes Farm complexes, the settlement retains many of the buildings recorded on the first edition OS map of 1884. The setting of the church, therefore, makes a considerable contribution to its value, and due to the open view across farmland to the north-west, the setting extends to the draft Order Limits"

ID Number	Name	Grade	Value	Operational Effects	Mitigation	Significance of Effect
1179387	Manor House	II	Medium	The Project would introduce tall infrastructure within the setting of the asset, causing a minor change to the rural aspect of the asset's setting, which makes a moderate contribution to its value	There is no suitable mitigation to reduce this effect	Not significant negative effect

1049992	Church of All Saints	I	High	The Project would introduce tall infrastructure within the setting of the asset, causing a minor change to the rural aspect of the asset's setting, which makes a moderate contribution to its value	There is no suitable mitigation to reduce this effect	Not significant negative effect
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Significance

List description, Manor House, grade II:

C17/18 timber-frame house. Plastered. Steep pantile roof with gabled end with late C19 shaped barge boards. Brick chimney stack off centre. Two storeys and attic. Late C19 casements. C19 wing at right angles to north.

- 9.1.18. Manor house is approximately 300 years old and the surviving physical attributes provide an understanding on the use and evolution of the building of a farmhouse from the 17th century. The house also provides evidence of an understanding of local vernacular building traditions of Norfolk during the agricultural revolution. Notable physical attributes include the steeply pitched roof (probably originally thatched) and tall stacks, together with a prominent gable end facing the road. The ruins of a building associated with the farmstead may also provide evidential evidence, which is considered to be medium.
- 9.1.19. Manor House was established as a farm in the late 17th/early 18th century. The building provides an insight into modest farmhouses and an associated farmstead being constructed during the agricultural revolution at the beginning of the 18th century, which contributes to its historical value which is

considered to be medium. The aesthetic value is derived from the building's attractive appearance which comprises a two storey building, rendered and painted white under a red clay tiled roof. Decorative barge boards adorn the gabled end. The house contributes to the local streetscene and is a visible landmark looking east across the farmland from the village of Tibenham

- 9.1.20. The building has communal value in so far as it has been a familiar landmark in the area for over 500 years and has featured in the day to day lives of those who live, work or pass through the area. Its continuous use as a private dwelling means that it has low communal value.
- 9.1.21. Manor House faces east across open farmland towards the village of Tibenham and is clearly visible from the village. It is a local landmark. The farmstead contributes to the setting as does the open aspect to the east with wide ranging views towards the village and Church of All Saints.

List description, Church of All Saints, grade I:

C11 north wall of nave with Norman window. Late C13 chancel with 3-light east window. C14 south aisle with window with curvilinear tracery and late Perpendicular straight-headed window. Similar Perpendicular clerestory windows. C14 south doorway. C15 porch. Tall C15 west tower with stair turret and with flushwork on base, diagonal buttresses and battlements with evangelists for pinnacles. Interior: four-bay Decorated arcade with quatrefoil piers with shafts. Late C14 arch-braced nave roof. Buxton chapel at east end of south aisle, 1635, with family pew with balustrade elevated to half height of chapel and reached by staircase with balustrade. Fine C17 octagonal pulpit with tester and strapwork and obelisks. C17 lectern. Part of C17 screen. Font with shafts around columns and with octagonal bowl, with traceried sides. Built of flint rubble with stone dressings and with slate and lead roofs

Pevsner:

In the nave one Norman N window, The chancel E window, if correctly renewed, of late C13 (three stepped lancet lights under one arch), Dec s aisle, complete with doorway and arcade (four bays, quatrefoil piers with thin shafts in the diagonals, round capitals, polygonal abaci, arches with one hollow chamfer and on wave). Nave roof with arched braces. Tall Perp w tower. Diaper flushwork on the base and upper part of the buttresses. Chequer flushwork higher up the buttresses. Panel flushwork on the battlements. The four Evangelists instead of pinnacles. Late perp. Straight headed windows in the E-part of the S aisle.

Fuller Long HEA Assessment of Significance

- 9.1.22. A church is known to have been located here since the 12th century and thus has considerable age value. The structure, scale, location and materials used of feeds into an understanding of worship and buildings in the Middle Ages.

- 9.1.23. A shard of Late Saxon pottery and a Late Saxon knife blade recovered during groundworks in 2011 indicate that there was human activity in this area prior to construction of the church. There is likely to be extensive evidential value associated with the church and the churchyard.
- 9.1.24. The earliest features of the building are Norman in date - the tower dating slightly later to 1430. Much of the ancient timber survives, and the various building phases have been recorded several times over the years, contributing to the historic value of the property. The associative value relates to the families of the parish who are commemorated here, including the powerful Buxton family whose pew still survives, and more recently to the 445th Bombardment Group of US Air Force which flew from Tibenham airfield. The historic value of the church is considered to be high.
- 9.1.25. The aesthetic value is high, and relates to the 15th century perpendicular church tower which rises above a relatively modest nave, constructed from flint with stone quoins. According to the Churches of Norfolk website, the tower is a 'vast... sentinel that dwarfs the little village around it'. The north walls of the nave and chancel are largely of distinctive herringbone masonry of carefully chosen flint pebbles indicative of late 11th century or early 12th century date. The Romanesque walls were heightened and supported by a pair of large buttresses in the later Middle Ages. The five-bay arcade is a typical 14th century design. The church has long served the community of Tibenham and continues to do so. The communal value is therefore high. The Church of All Saints is at the highest point in the parish, and is a beacon to this part of south Norfolk. Its immediate setting is formed by the churchyard and surrounding village, but the wider landscape of the surrounding Norfolk countryside makes a strong contribution to the setting of the church.



Norfolk Sheet XCVI.SE Surveyed: 1882 to 1883, Published: 1883

Fuller Long HEA Assessment of Impact

- 9.1.26. The proposed tall infrastructure will bisect the agricultural setting between these two assets which have extensive views across the landscape. Their settings are intrinsically linked with the countryside in which

they are located, and analysis of historic maps indicate that the outlook across the farmland has remained unchanged for centuries. The agricultural landscape has been historically and visually linked with Manor House Farm since the 17th century and the Church of All Saints since the 12th century, and its change in appearance and nature as a result of the Project will harm the setting and significance of the historical assets.

Fuller Long HEA Critique Of NGET Assesement

- 9.1.27. While setting is correctly identified as making a considerable contribution to the value of both heritage assets, the preliminary operational effect assessment states that the Project will cause only a minor change to the rural aspect of their setting which makes a moderate contribution to their value. Here again, is an example of the failure to cross reference the significance of an asset before assessing likely impact. In reality, the Pylons will dominate the landscape causing substantial harm to the contribution that setting makes to the significance of both listed buildings. The assessment of All Saints Church records that it is located within Tibenham Conservation Area – this is an example of a mistake as Tibenham does not have a conservation area. The setting is correctly assessed as extending to the DOL but the impact to the setting (minor) is vastly underestimated as a result of using a matrix to establish significance and impact.



View looking east towards the Church of All Saints (top) and west towards Manor House (bottom) illustrating the agricultural landscape that contributes towards the setting of the Heritage Assets. The pylons and wirescape will bisect the field, severing the views and relationship between the two listed buildings and dominating views to and from the house and church, substantially harming their significance and setting.

HEMPNALLS HALL (1180451), BRIDGE (1032280) MOAT AND FARMSTEAD (NDHA AND CURTILAGE LISTED), COTTON, SUFFOLK



Hempnalls Hall, (grade II , 16th century) Bridge and Moat looking south.

Location: 190m from DOL

NG ASSESSMENT OF SIGNIFICANCE AND CONTRIBUTION OF SETTING

“The Grade II listed ‘Hempnalls Hall’ (1180451) is located 60 m off the north-western flank of Willow Lane, c. 1.2 km north-east of Cotton, and c. 190 m south-west of the draft Order Limits. The asset is of medium value based on its designation and its evidential, historical and aesthetic values. The manor house dates to the late 16th century, has a small 18th century rear wing, was restored in the 1980s and comprises a plastered timber frame structure with pantiled roof. The Hall forms part of a historical farmstead known as Hempnalls Hall. The Suffolk HER has recognised the farmstead complex as a non-designated heritage asset (2445). The farmstead has historical and evidential value.

The setting of the Hall is informed by its secluded location within an earlier medieval moat (2252), by its relationship with its non-designated outbuildings, which are recorded on the first edition OS map of 1885, and by its relationship with the non-designated former farming complex beyond the bounds of the moat to the north-east, which is also recorded on the OS map. The setting is further informed by the surrounding agricultural landscape, with which the asset, its outbuildings and the associated farming complex have historical and former functional relationships. The moat, asset and all non-designated buildings are largely enclosed by a small copse, which affords the group seclusion and privacy. The setting of the asset, therefore, makes a considerable contribution to its value, and due to the proximity of the Project, the setting extends to the draft Order Limits”.

ID Number	Name	Grade	Value	Operational Effects	Mitigation	Significance of Effect
1180451	Hempnalls Hall	II	Medium	The Project would introduce tall infrastructure within the setting of the asset, causing a minor change to the rural aspect of the asset’s setting, which makes a moderate contribution to its value	There is no suitable mitigation to reduce this effect	Not significant negative effect

Significance

List description, Hempnall’s Hall, grade II:

GV II Manor house. Late C16; small C18 rear wing, replacing an earlier range to the west which ante-dated the existing main range. Restored 1980’s. Timber framed, mainly plastered, the front with

panelled plasterwork of 1980's. Fine C16 crowstepped red brick gable end to right. Plain tiled roof. 2 storeys and attic; 1½-storey rear wing. 3 windows, 4-light casements with mid C20 square-lead glass. Between the upper windows, 2 original windows with ovolo-moulded mullions. Central late C18 doorway: reeded architrave with corner squares (once adorned with masks), broken entablature and open dentilled pediment enclosing semi-circular fanlight with glazing bars. Old door with 6 fielded panels. 3 gabled dormers. C16 gable end has paired windows at 3 levels, those to the upper floors blocked. Integral stack with 2 detached octagonal shafts on moulded bases. A further stack to rear has oblong base and 3 square shafts set diamondwise. Left gable end is of later date, the house probably once extending further: ground floor has brickwork of c.1700 and an original ovolo doorframe, repositioned from elsewhere. Interior. 2 fine stone fireplaces have moulded 4-centred arches and shield-carved spandrels; fireplace in parlour has one shield inscribed 'EC' (for Elizabeth Clare) and dated 1636. A stuccoed attic fireplace. An elaborately-carved Flemish fireplace in an upper room was inserted in 1980's. One ovolo service doorway, a blocked front cross-entry doorway and an upper doorway to the earlier wing (now lost). Much original or early C17 internal panelling was removed in early C20; a little remains. One bay of hall ceiling removed to accommodate a 1980's well stair. Roof has 2 rows of butt purlins. Surrounding medieval moat.

Pevsner:

Hempnall's Hall. With a stepped brick gable to the W. The rest timber framed. Brick bridge of one arch across the moat.

Fuller Long HEA Assessment of Significance:

- 9.1.29. Hempnalls Hall is first recorded in the 14th century and was identified as part of the vill of Caldecota in the Domesday record of 1086. The substantial age of the property and the lack of changes over the centuries contributes to the evidential value of the property, as does the moat and listed bridge and neighbouring farmstead (which is curtilage listed and identified as an NDHA). The survival and quality of the form, appearance and materiality of the Hall provides an understanding on the use and evolution of the building as a property of relatively high status in the local area. Notable physical attributes include the timber framed core and a brick stepped brick gabled end. The materials associated with the late 16th century provide evidence in building fashion, access to different materials, aspirations, and social status. The presence of a historical deer park and archaeological finds around the hall and the medieval phases of a dwelling contribute also contribute to the evidential value which is considered to be high.
- 9.1.30. A Manor House has stood here since the early medieval period and was likely constructed as a timber framed hall in the 14th/15th century when it was owned by the Hemenhale family from Hemnall. The Hall has been owned by historical figures of note over the centuries. It was the likely birthplace of William de la Pole, 1st Duke of Suffolk (1396-1450), and later acquired by Sir John Fastolf (1380-1459), both of whom fought in the Hundred Years War, and who were immortalised by Shakespeare. Charles Brandon, who

was a favourite of Henry VIII and married his sister, Mary Tudor, also held the estate in the 16th century when the listed bridge over the moat was likely constructed. Anne of Cleves was also bequeathed the Hall as part of the divorce from Henry VIII. The historical value is therefore high.

- 9.1.31. The aesthetic value of the building is high and is derived from the appearance of the attractive Elizabethan manor house set within formal gardens. The architecture of the house provides insight into the vernacular design and materiality of manor houses being constructed in the Tudor period. The relatively simple form has been little changed, allowing an understanding of the original appearance of the property.
- 9.1.32. The Hall has communal value in so far as it has been a familiar landmark in the area for over 600 years and has featured in the day to day lives of those who live or pass through the area. It is well known locally and is visible from a PROW which contributes to its communal value, which is considered to be medium.
- 9.1.33. The immediate setting of the Hall is derived from the moated site which is enclosed by mature trees. However, the site is surrounded by the Suffolk countryside which has changed little over the centuries and would have been the same vistas that were known by the historic owners of the house. The agricultural landscape has a historical and functional relationship with the farm. The tall infrastructure will be visible from Hempnalls Hall, above the farmstead to the west, which will severely harm the setting and significance of all of the designated and non-designated assets associated with the site.



Suffolk Sheet XLVI.NE - Surveyed: 1884, Published: 1885

Fuller Long HEA Assessment of Impact

9.1.34. The wider setting of the designated and non-designated assets that make up the Hempnalls Hall farmstead is derived from the surrounding agrarian landscape that has been farmed by Hempnalls for centuries. The pylons will pass very close to the significant historic group, and will be visible above the farmyard buildings and trees to the west and north west, severely impacting the significance of the group. The landscape surrounding the hall and moat has remained unchanged for centuries, providing the farmland associated with the Hall and associated farmstead. The tranquil nature of the countryside contributes to the peaceful setting of the Hall which will be significantly harmed by the introduction of the pylons in such close proximity.

Fuller Long HEA Critique of NGET Assessment

9.1.35. The PEIR states that the preliminary operational effect of the Project, which passes within 200m of the historic cluster of buildings, will cause a minor change to the setting which makes a moderate contribution to its value. The Project will be visible above the farmbuildings and trees to the east of Hempnalls Hall and the pylons will dominate the landscape causing substantial harm to the contribution that setting makes to the significance of the designated and non-designated assets.

9.1.36. The grade II listed bridge has been included in the HEBR but scoped out of the PEIR assessment on the basis that its setting does not extend to the DOL and therefore would not be impacted. Whilst the setting of the bridge is localised in nature, its relationship with the Hall and the moat means that its significance is also linked to the group value of the buildings. As such, the setting does extend to the project, and therefore harm will be caused to the group which includes the bridge .

9.1.37. The setting of the farmstead and the moat (Curtilage listed and NDHA) has not been assessed and the preliminary operational effects have likewise not been assessed, despite the assets being located within the 250m buffer. This is in conflict with national and local policy.



View looking south-east from Hempnalls Hall across the farmstead (curtilage listed) towards the location of the pylons which will be clearly visible above the roofscape and treeline.

BLEAK HALL (1251669) AND FARMSTEAD (NDHA), SOMERSHAM, SUFFOLK





East elevation of Bleak Hall (16th century, grade II)

Location: Adjacent to DOL

NG ASSESSMENT OF SIGNIFICANCE AND CONTRIBUTION OF SETTING

"The Grade II listed 'Bleak Hall' (1251669) is located on the western flank of Blood Hill, c. 1.1 km south-west of Somersham, immediately west of the draft Order Limits. The asset is of medium value based on its designation and its evidential, historical and aesthetic values. The house was built in three stages in the 16th century, around 1600 and in the 18th century. It comprises a plastered timber frame structure with a plain tiled roof. The Hall forms part of a historical farmstead known as Bleak Hall. The Suffolk HER has recognised the farmstead complex as a non-designated heritage asset (2474). The farmstead has historical and evidential value.

The setting of the Hall is informed by its isolated roadside location and by its relationship with its outbuildings, one of which (a barn) is recorded on the first edition OS map of 1886. The setting is further informed by the surrounding agricultural landscape, with which the asset and outbuildings have a historical relationship. The setting of the asset, therefore, makes a considerable contribution to its value, and due to the proximity of the Project, the setting extends to the draft Order Limits".

ID Number	Name	Grade	Value	Operational Effects	Mitigation	Significance of Effect

1251669	Bleak Hall	II	Medium	The Project would introduce tall infrastructure within the setting of the asset, causing a moderate change to the rural aspect of the asset's setting, which makes a moderate contribution to its value	There is no suitable mitigation to reduce this effect	Significant negative effect
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Significance

List description, Bleak Hall, grade II:

House, built in 3 stages: C16, c.1600 and C18. 2 storeys. Timber-framed and plastered. Plaintiled roofs. Axial C17 chimney of red brick has a central pilaster strip at front and back faces. At the front are mainly late C20 casements and at the rear mainly C19 small-pane casements. Lean-to C20 front entrance porch with arch-headed framed and boarded door. To left of entrance is a C16 cell of 2 bays with blocked diamond mullioned windows; the walls were raised and a new roof built in C17. To right is a 2-cell extension of c.1600, containing hall and service. Both phases have plain heavy exposed framing. The central chimney has a large lintel led open fireplace in the hall and 2 plastered arched original fireplaces to the parlour and chamber. Known as Cold Hall until C20.

Fuller Long HEA Assessment of Significance:

- 9.1.39. Bleak Hall farmhouse dates to the early 17th century and historically formed part of an enclosed farmstead courtyard with outbuildings (many now demolished). The building is an example of an isolated farmhouse in a rural setting which provides evidence of local vernacular building traditions of Suffolk during the agricultural revolution. Notable physical attributes include the timber framed core with a steeply pitched roof (probably originally thatched) and a cross wing with gable end facing the road. The evidential and historical Values are considered to be medium.
- 9.1.40. The farmhouse is an attractive two storey building rendered and painted white under a red clay tiled, pitched roof. The simple form contributes to the aesthetic values of the building, reflecting the functional nature of the farmhouse. The aesthetic value is considered to be medium.
- 9.1.41. The building has communal value in so far as it has been a familiar landmark in the area for over 500 years and has featured in the day to day lives of those who live, work or pass through the area. Its continuous use as a private dwelling means that it has low communal value. Bleak Hall faces east across open farmland towards the village of Somersham. Footpaths linking the farm with the village are shown

on the 1886 map and are still in evidence today. The farmstead contributes to the setting as does the surrounding agricultural land with which the farm has an historic and functional relationship.



Suffolk Sheet LXXIV.NE Surveyed: 1881 to 1884, Published: 1886

Fuller Long HEA Assessment of Impact

- 9.1.42. The wider setting of the designated and non-designated assets that make up Bleak Hall and farmstead is derived from the surrounding agrarian landscape that has been farmed by Bleak Hall (formerly Cold Hall) for centuries. The peaceful outlook across the open countryside to the east and west contributes to the tranquil nature of the listed building which has a historical and functional relationship with the agricultural landscape. The DOL extends to the front and rear gardens of the house whilst the tall infrastructure will dominate the landscape to the north, causing significant harm to the significance of the grade II listed building and its setting.

Fuller Long Critique Of NGET Assessment

- 9.1.43. The preliminary operational effect within the PEIR states that the Project will cause a moderate change to the setting of the grade II listed building, which is considered to make a considerable contribution to its value. Bleak Hall will be substantially harmed by the construction of the pylons, which will pass within 50m of the house, to the severe detriment of the historical and aesthetic significance of the building, once again demonstrating that the matrix method of assessment is unsuitable. The pylons will dominate the landscape and will sever the relationship between the village of Somersham and Bleak Hall. Whilst the PEIR acknowledges that the Project will have a significant permanent negative effect on the building, no mitigation is offered to offset the harm.

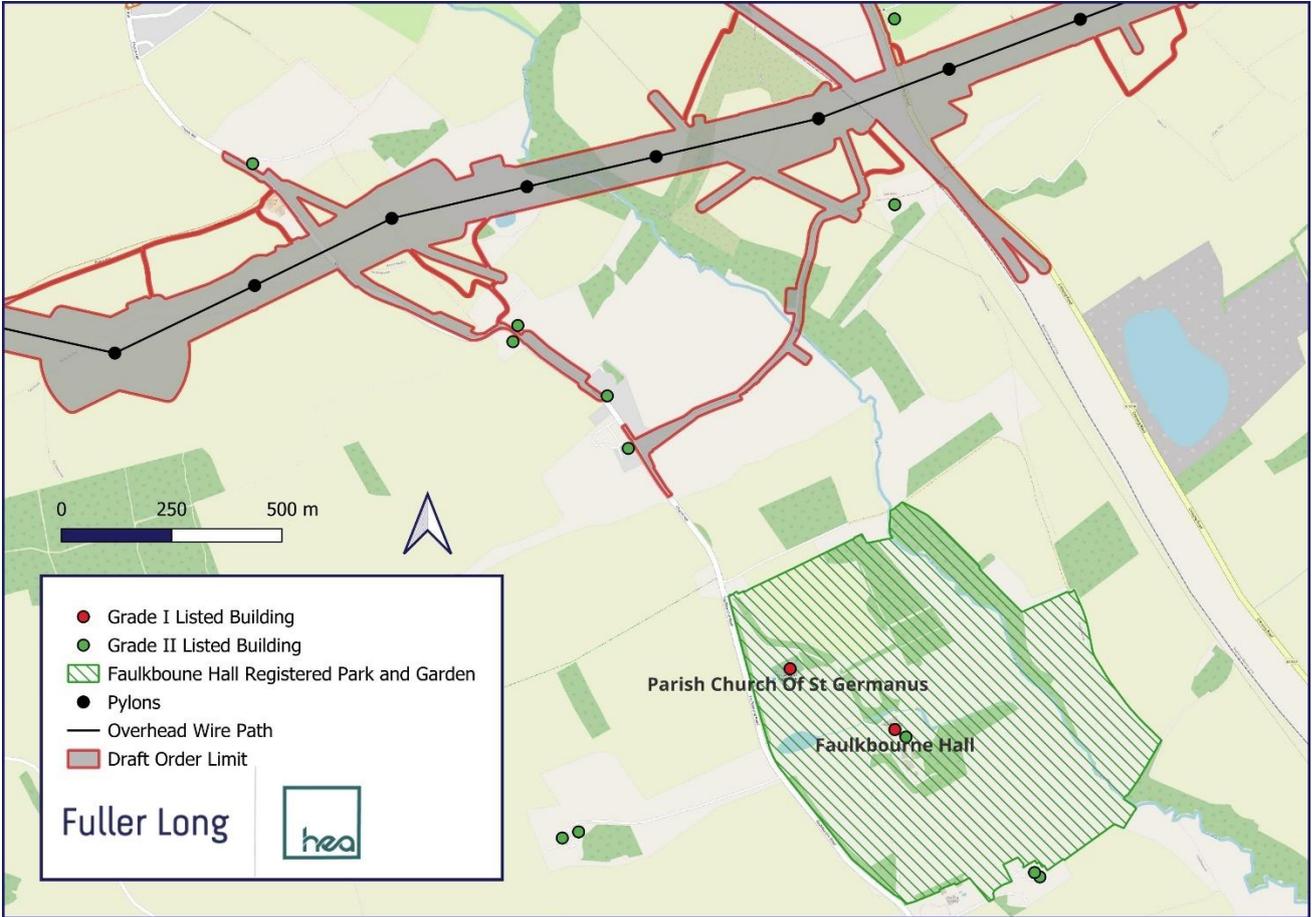
- 9.1.44. Bleak Hall, like thousands of other grade II listed buildings, had not been considered prior to the current HEBR. The decision to move the draft alignment between RG195 and RG200 after the 2023 non-statutory consultation to avoid oversail of an equestrian business was therefore flawed as the heritage status of Bleak Hall was not taken into account. Although the impact is now assessed as a 'significant negative effect' by the PEIR, this is an example of a lack of due process and mismanagement of information which failed to inform the decision making process for the routing of the Norwich to Tilbury Line.



View looking north-east from Bleak Hall to the proposed DOL and pylon route 145m away.

Fuller Long

FAULKBOURNE HALL (1337782) AND REGISTERED PARK AND GARDEN (1000341), ESSEX



5.

Location: Hall - 830m, RPG – 370m

NGET ASSESSMENT OF SIGNIFICANCE AND CONTRIBUTION OF SETTING

Faulkbourne Hall and the RPG:

"The high value Grade I listed 'Faulkbourne Hall' (1337782) is of evidential, historical, and aesthetic value. The asset is located approximately 890 m south-east of the draft Order Limits, and 260 m north-east of Church Hill (road). The two-storey red-brick mansion dates to the was built c.1439 for Sir John Montgomery, incorporating part of an earlier timber-framed house, with 17th and 19th century alterations and extensions.

The surrounding medium value Grade II listed registered park and garden (RPG) of 'Faulkbourne Hall' (1000341) is also of evidential, historical, and aesthetic value and located approximately 870 m south of the draft Order Limits, covering approximately 55ha and includes the Grade I listed 'Parish Church of St. Germanus' (1337803) within its bounds. The River Brain also travels north-west/ south-east through the core of the parkland. The current gardens date to the late 19th century and overlay an earlier 16th century garden. The 16th century gardens also overlay a deserted medieval village (DMV). The gardens are surrounded by a mid-18th century park, later extended during the late 19th century. Faulkbourne Hall designed landscape (5017) is also noted by the HER and occupies the northern half of the Registered Park and Garden dating to the 15th century. The designed landscape (5017) lies approximately 370 m south of the draft Order Limits. Approximately 4ha of the late 19th century gardens are located on the site of older gardens which likely date to the medieval period. Faulkbourne DMV (5018) is also located within the designed landscape area. The remains of an avenue of trees approaching the Hall (1337782) from the north-west passes close to the church (1337803) on the west showing a former drive. The village was likely abandoned when two lakes were constructed in the valley to the West of the Hall and south of the church. The only positively identified features associated with the DMV are an area of surface quarrying 50 m south-east of the church and random locations where tree roots have been removed. No house sites or garden plots can be observed; however, some linear features have been observed as cropmarks on aerial imagery (5018). The designed landscape and National Grid | March 2024 | Norwich to Tilbury 645 DMV location are of evidential and historical value and of medium and high value respectively.

The setting of the listed assets is informed by their purpose as a medieval to postmedieval manorial estate within a formal designed landscape and within a wider rural agricultural landscape to the south-east of Faulkbourne itself. Collectively the assets were designed to be collectively connected through the creation of a formally designed landscape as well as maintain its link with a wider surrounding agricultural landscape as a high-status dwelling within the confines of its own boundary. These assets broadly retain this historic setting, and in the case of the church, its functional setting which collectively makes a very considerable contribution to the setting of the assets. There is little to no setting impact concerning the DMV with the only surviving element of its original historic setting being that of the rural agricultural landscape within the wider area with which the DMV would have shared a connection with.

There is likely to be little intervisibility between this asset and the draft Order Limits, predominantly prevented by established surrounding trees and hedges and topography. The setting of these assets does not extend to the draft Order Limits".

The Hall, Registered Park and Garden are designated at grade I and II respectively, the designed landscape is identified as an NDHA. All of the above assets were scoped out of the PEIR as their settings were not considered to extend to the DOL.

The setting of the listed assets is informed by their purpose as a medieval to post-medieval manorial estate within a formal designed landscape and within a wider rural agricultural landscape to the south-east of Faulkbourne itself. Collectively the assets were designed to be collectively connected through the creation of a formally designed landscape as well as maintain its link with a wider surrounding agricultural landscape as a high-status dwelling within the confines of its own boundary. These assets broadly retain this historic setting, and in the case of the church, its functional setting which collectively makes a very considerable contribution to the setting of the assets.

Pevsner:

Faulkbourne Hall is the most impressive C15 brick mansion in the country, as early in its beginnings as the more regular and more famous Herstmonceaux, Tattershall and Caister. Faulkbourne is not regular in its plan and it is still in its appearance half castle and half mansion. There was on the site, the Royal Commission has shown, an early C15 timber framed house. To this the brick parts were added from 1439. When Sir John Montgomery received licence to crenellate, to probably before 1489, when the new King, Henry VII, proposed to stop at Faulkbourne on one of his progresses. The entrance (W side) is in its r. half of the C19, and the l. half also is recased and provided with a C19 porch. But the symmetry of the two angle towers, rectangular but with canted outer corners, is original. Original also is at least one of the curious brick spires with their crockets on the two towers (the one on the N tower). Between the porch and the r. tower lies the original W front of the early C15 house which extended to the E from here and appears with a N-S cross wing at the present E front, though the wall here is also encased in brick. But in the interior on this side, in the kitchen, the W wall and part of the S wall still show their timber studding. When Sir John Montgomery encased the E wall he also added two bay windows. On the ground floor, these still have their windows with four centred heads. Their tops have battlements on trefoiled corbel friezes, and this motif occurs also in the other C15 parts of the facades. The main show side is the N front. It has a big square tower with corbelled-out tourelles and a polygonal stair turret, rather French- than English-looking. The spiral stair in the turret is also of brick with a rising brick tunnel-vault. The main room of the N range is at its W end. It is now the Dining Room but was no doubt originally The Hall. It has moulded ceiling beams and at the dais end a bay window with a very pretty brick lierne vault. The Hall has always been one-storeyed. The upper floor of the bay has a second brick vault, and there is in addition an oriel window to its W, The C17 added a larger staircase on the side of the Hall of the early C15 house. It has turned balusters and may date from c.1640. Later still, dated on

a rainwater head 1693, is the S extension of the E range with its sash-windows. In spite of this late date, it still has two straiht gables to the E. The stables are also of brick, in an C18 imitation Gothic, with heavy battlements.

Significance

List description, Faulkbourne Hall grade I, Park and Garden, grade II:

HISTORIC DEVELOPMENT

By 1426 the manor of Faulkbourne had come into the hands of Sir John Montgomery who in 1439 was granted a licence to crenellate his house there; it is from this period that the present red-brick Hall dates, incorporating fragments of the earlier timbered house. Sir John was succeeded in 1449 by his widow and then, in 1464, by his son Thomas who was well favoured by the monarchy. His wealth and power was reflected in a visit by Henry VII to Faulkbourne in 1489. Sir Thomas' widow inherited the estate in 1495 and was succeeded in 1503 by Sir Thomas' sister, Alice Spice whose granddaughter Phillipa married John Fortesque.

When John died in 1518, Phillipa married Sir Francis Bryan, who was also very popular at court, being a friend to Henry VIII. Thus the status of Faulkbourne Hall and its estate remained high. One of the surviving garden walls may date from Sir Francis's time, but no other record of the landscape which surrounded his house has been found to date. Henry Fortesque, Sir Francis' stepson succeeded and his descendants held the estate until 1637 when it was sold to Sir Edward Bullock. His grandson, also Edward, added a south-east wing to the Hall in c 1693 and thanks to two marriages to wealthy wives, the Bullock family flourished at Faulkbourne during the C18. They built the stables to the south of the Hall, the walled kitchen garden to the north, and laid out pleasure grounds and a park with a straight avenue running up to the Hall from the south lodge entrance. In 1832 they added the west front to complete the present facade of the Hall and in the mid C19 extended the park to the north, realigned the north drive, and added the lodges.

In 1897 the estate was put up for sale and was purchased by Mr Christopher Parker who undertook the development of the gardens, including using the remains of the moat to create cascades and a water garden. During the C20, under Christopher Parker's successors, the gardens have retained the layout he gave them. The site remains (2000) in single private ownership.

Hall:

Mansion. C15, altered and extended in C17 and C19. Red brick mainly in English bond, roofed with handmade red clay tiles. Plan in RCHM. Hall range aligned NE-SW with crosswing at NE end, 1439-49. Range to NW added 1449-94, with square tower at N corner and stair turret at its E. corner. Wing to SE of crosswing added c.1693. C19 extensions in S angle, completing an approximately rectangular plan. Mainly 2 storeys with attics. The SW elevation (the present entrance elevation) includes the C19 S

extension and the old but remodelled front of the main block. This is of symmetrical design, the main wall being of 2 bays divided by a C19 2-storey porch and flanked by two 4-sided turrets;

the NW turret retains original C15 brickwork on its northern faces, but the southern faces have been partly rebuilt with later brick and have a moulded string course. The SE turret is of similar design, but the brickwork is in Flemish bond with black headers. The brickwork of the main wall is C19. The whole elevation has a brick corbel-table like that of the NW elevation (q.v.), but only that on the N and part of the W faces is original. Both turrets have crenellated parapets and octagonal crocketed spires of brick, probably C17. In the NW face of the NW turret are 2 of the original windows, each of a small single light, blocked, with moulded jambs, square head and moulded label. On the NW side of the C19 porch is a lead rainwater head inscribed B E E 1666 The NW elevation has its main wall divided by a 2-storeyed bay window, flanked on the SW by the turret described above, and on the NE by the great tower.

The SW part of the main wall has a moulded string course between the 2 storeys, partly restored, and the whole elevation is crowned by a crenellated parapet. Below it is a corbel-table of cinquefoiled arches with trefoiled spandrels of moulded brick. The NE wall has in the upper storey an original late C15 oriel window, supported on 5 tapering and moulded brick corbels representing fan-vaulting, with moulded pendants; the window is of 4 square-headed lights with brick transoms and mullions; on either side of it is a blocked window; the other windows in the main wall are C19 restorations. The semi-octagonal bay window in the middle of the front has on the ground floor, in each face an original square-headed window, the easternmost altered to a doorway, the others widened by partly cutting away the moulding of the jambs. On the first floor are 3 similar but unaltered windows with transoms under a single label, as are the 3 middle lights below. On the main wall NE of the bay window is a rainwater head with the date 1637 and the arm of Bullock.

The great N tower is of 4 storeys including the basement. At the N and W angles are diagonal buttresses of 3 stages which carry octagonal turrets. Against the SW wall of the tower, above the main block, is a C16 bay, now inaccessible, probably intended to contain a stair, with a quatrefoil piercing in its lilt face. The merlons of the parapet are pierced with cross loops. In the middle of the NW side of the tower is a projecting chimney stack, corbelled out approx. 2 metres above ground level, with 3 truncated octagonal shafts. Below it are traces of a blocked window to the basement. The ground floor has 2 windows in each of the N walls, and one in the SW walls, and the first floor has one window in each wall; these are of 2 lights with transoms and moulded labels, partly restored. The second floor has a window in each wall of one light with a label.

The NE elevation consists of 3 parts, the great tower, the crosswing of the original building, and the late C17 SE wing. At the E angle of the tower is an octagonal stair-turret which rises above the top of the tower and has a similar crenellated parapet and corbel-table. At each stage there is a square light, the top one retaining a quatrefoil, the others altered. The NE parapet has the stump of a diagonal pinnacle. The next part, SE of the tower, is of 3 storeys and is flanked by 2 bay windows of full height. The 2 lower

storeys are of early C15 brickwork, somewhat larger than those of the NW elevation. The third storey is a late C17 addition or rebuild. The original first-floor level is marked by a moulded string-course. The northern bay window is semi-hexagonal, and has at the angles round shafts of cut brick with moulded bases. In the middle and SE faces of the ground floor are original windows, the SE window blocked, the middle window of two 4-centred lights under a 3-centred head. The second storey of the bay window has in each face a tall early C18 sash window cutting through the original string-course. The third storey has C17 casements with high transoms.

The space between the NE main wall and the stair turret has been filled in; the closing wall has an altered window with a 3-centred head, and 2 late C17 transomed casements, restored. The main wall between the bay windows has 3 late C17 casements and one early C18 sash. The southern bay window is semi-octagonal, of greater projection than the northern bay, with low buttresses at the outer angles which are original or early. In each of the 3 outer faces of the ground floor is an original window. The middle window is of two 4-centred lights, restored, under a 3-centred head, and the side windows of single lights with 3-centred heads. The 2 upper storeys have late C17 transomed casements, the lower ones set in original square-headed openings with moulded jambs and heads.

The late C17 SE wing is of 3 storeys divided by moulded string-courses, and has on this elevation 2 feature gables. The first storey has 2 late C17 casements, one blocked, and the third storey has 2 more, open. The second storey has 5 early C18 sashes and one blocked aperture. The SE end of this wing is of red stretchers and black headers in Flemish bond, with the same string-course, and a crow-stepped gable. On the second floor is an early C18 sash, and on the third floor a late C17 casement. On the SW side of this wing is a late C17 4-plank door with 2 lights over, now within a C19 arcade, and at the NW end of the arcade is a re-sited C17 door with applied diamonds, escutcheon plate and drop-handle. Above the C19 arcade is a late C17 casement on the first floor, and 2 on the third floor. On the first floor of the SE wall of the main building is an early C18 sash with crown glass.

The dining-room (7 on plan) has late C15 transverse moulded beams. At the NE end of it a passage has been partitioned off, with late C16 oak panelling on one side and early C17 oak panelling on the other. The passage ends in the NW bay window, which has an elaborate vault with moulded brick ribs and liernes, with stone or plaster shields at the intersections. The stair-turret at the E corner of the great tower has brick winding steps and newel; in the outer wall is a recessed round handrail of moulded brick; at the basement is a doorway with 4-centred head.

The kitchen (3 on plan) retains the original early C15 timber framed SW wall and part of that on the SE. The SW wall is of 3 bays with moulded wallposts, and has an original doorway with moulded frame and heavy 6-panel door. Above this is a late C16 window of 5 lights with moulded jambs and mullions, and iron saddle bars. In the SE wall is a similar window of 3 lights, and below it a recess, possibly a former doorway. The main staircase inserted c.1640 in the middle of the original building (2 on plan) has a square well, moulded closed string and rail, square panelled newels with restored caps, and heavy

turned and square balusters. The upper storey of the bay window in the NW elevation has a vaulted ceiling similar to that on the ground floor, and is entered through an C18 partition closing the original brick archway, which has a 4-centred head. Several of the rooms in the upper and attic storeys have early doors of wedge-shaped planks on battens. In the vaulted cellar of the great tower, in the W wall, is a 4-centred archway and recess, which possibly opened into a former staircase. In the S wall is a pointed recess, possibly a former doorway. The SE stair turret is entered by a doorway with a 4-centred arch; on this floor in the NW wall is a brick fireplace with 4-centred head.

Park and Gardens:

Late C19 gardens on the site of C16 gardens, surrounded by a park of mid C18 origins, extended during the late C19.

DESCRIPTION

LOCATION, AREA, BOUNDARIES, LANDFORM, SETTING

Faulkbourne Hall lies just beyond the north-west edge of the Essex town of Witham. The site covers c 55ha, surrounded by agricultural land. The western boundary is formed by Faulkbourne Road which links the village of Faulkbourne to Witham, while the southern boundary is defined by a track associated with Warren Farm. To the north and east the park is bounded by farm tracks and farmland. The ground at Faulkbourne Hall slopes gently from west to east, towards the course of the River Brain which runs through the eastern half of the park, rising again beyond it to the eastern boundary from which point there is a fine view of the Hall.

ENTRANCES AND APPROACHES The two entrances to Faulkbourne Hall lie on Faulkbourne Road, one at the northern end and one at the southern end. From the mid C19 red-brick and tile picturesque South Lodge cottage c 400m to the south of the Hall, the drive passes through wooden gates and runs north through the park to arrive at the west front. North Lodge, of similar style and construction to South Lodge, stands on the west side of the drive c 450m north-west of the Hall. The drive runs south and south-east through the park, passing to the east of St Germain's church (listed grade I) and to the west of the Gardener's Lodge (dated 1899) before arriving at the gravelled forecourt below the west front. Sometime between 1838 (Tithe map) and 1874 (OS) the north drive was moved to its present position, prior to which it came past the west side of the church.

PRINCIPAL BUILDING Faulkbourne Hall (listed grade I) is a large country mansion constructed of red brick with handmade clay tiles. It is built in two storeys with a crenellated parapet, with projecting bays and turrets to north-west and south-east, also with crenellated parapets and octagonal crocketed spires. The body of the Hall was built from 1439 onwards by Sir John Montgomery, incorporating part of the earlier timber-framed building. This was enlarged in c 1693 by the addition of the south-east wing and again in the mid C19 when the south wing was added and the west front remodelled.

The single-storey, red-brick crenellated stable block with central square clock tower lies c 80m to the south of the Hall, linked to the Hall by a length of garden wall, part of which survives from the C16 or earlier (listed grade II). The stables were erected in 1844 by the Bullock family; they are no longer used as stabling (2000).

GARDENS AND PLEASURE GROUNDS The gardens lie mainly to the north and east of the Hall, enclosed on these two sides by the remains of the moat, divided by several weirs. The moat is fed from springs and a small lake in the west park, which lead into a watercourse. The water flows from the watercourse into the moats and then continues out to the River Brain east of the gardens. A long herbaceous border runs along the east front, beside a grass terrace and gravel path which leads at its southern end to a small, enclosed, later C20 swimming pool area c 50m south-east of the Hall. Beyond the path to the east is a bowling green lawn, bordered to the east by the moat and to the north and south by tree planting.

Borders lie below the north wall of the Hall where lawns run up to the banks of the moat and related pools, developed by Christopher Parker in the late C19 as water gardens. A wooden footbridge over the moat level with the north-east corner of the Hall leads to a path through mixed tree and shrub planting, including some mature specimens, to the walled kitchen garden c 50m to the north (see below). Beyond the water gardens to the north-west is a late C20 wild garden, known as The Glade, created on the south side of a late C20 tennis court.

PARK The Hall stands to the west of centre of its c 52ha park which is retained under grass apart from the area to the north-east of the church and to the east of the walled garden. Many parkland trees were lost in the mid C20 to Dutch elm disease and later storm damage, although some mature lime and oak survive, particularly some old limes south of the Hall, as well as some fine mature cedar of Lebanon which date from the early C19. Elsewhere the park has been replanted in the later C20. The western half of the park, shown as existing in 1777 (Chapman and Andre) contains a small spring-fed lake located c 200m to the west of the Hall. This feeds a watercourse lined with cricket-bat willow which runs west and is connected to the moats to the north and east of the Hall. The lake and watercourse are also shown on the 1777 county map. St Germain's church stands c 250m to the north-west of the Hall. Dating from the C13 it forms an important part of the landscape scheme, backed to the west by a boundary plantation. The area immediately to the north-east of the church has, during the C20, been returned to arable production.

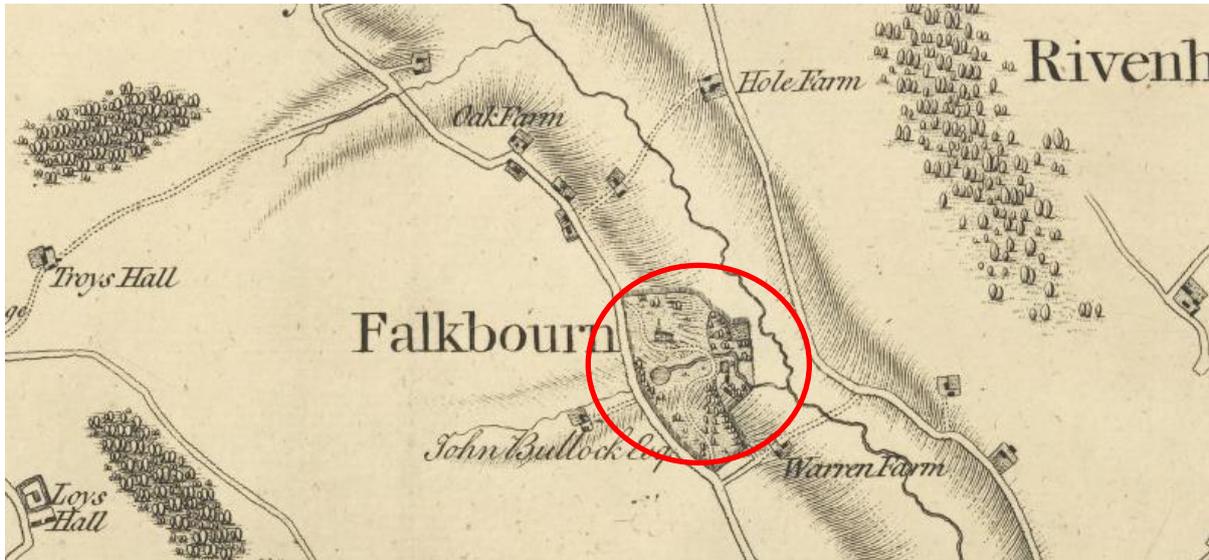
The eastern half of the park contains two large blocks of woodland, together with osier beds along the banks of the watercourse connecting the east moat to the River Brain. The land to the north of the watercourse is under arable production, while the south-east quarter of the park remains under grass with a scatter of mature park trees. Most of the east park appears to have been added, along with part of the northern area, during the C19. Successive OS maps suggest the boundary altered several times, although surviving park trees suggest there may have been little real change in the physical landscape.

KITCHEN GARDEN The partly walled kitchen garden lies c 50m to the north of the Hall. It is divided by central paths into borders used for growing flowers, fruit, and vegetables and contains late C20 frames and glasshouses. The garden was built in this position by the Bullock family as part of the mid C18 improvements and was developed as an ornamental garden by Christopher Parker at the end of the C19.

Fuller Long HEA Assessment of Significance:

- 9.1.46. Faulkbourne Hall is first recorded in the 11th century prior to the conquest, and subsequent owners are recorded throughout the centuries. The current hall comprises an early timber framed hall encased in a 15th century brick building which is evident today. The substantial age of the property and the lack of changes over the centuries contributes to the evidential value of the property, as does the moat, gardens and park land. The unique architecture of the building and phases of building provides an understanding on the design and evolution of the Hall throughout the years. Notable physical attributes include the original timber framed core and the crenallated tower, all of which have been clad in Tudor bricks which provide evidence of the fashions and materials of the early 15th century and the aspirations of Sir Thomas Montgomery, who was responsible for the extant house on the site.
- 9.1.47. The presence of archaeological finds within the area, including a DMV within the parkland and the medieval phases of the dwelling contribute to the evidential value which is considered to be high.
- 9.1.48. A Manor House has stood here since the early medieval period and the building consequently has great age value. The subsequent additions provide insight into the building technologies and fashions throughout the ages, and in particular, the imposing crenallated tower demonstrates how the great houses of the Tudor period were altered to reflect power and status. The older part of the house is a remarkable example of 15th-century brickwork.
- 9.1.49. The associative value of the hall is linked with monarchs and members of the aristocracy since Edward The Confessor. It was owned by Henry II's son in the 14th century, and was visited by King Henry VII in 1489, not long after the Tudor dynasty was established. The Hall was subsequently owned by various aristocratic favourites of the Crown, one of whom, Colonel John Bullock, was painted by Thomas Gainsborough in the 1770s, most likely in the grounds of Faulkbourne with the countryside depicted in the distance. The historic value is considered to be high.
- 9.1.50. The aesthetic value of the Hall relates to the wealth of architectural features which span several centuries and which are described briefly above and in more detail in other literature relating to the house. The property is very well preserved and is of local and national importance. The aesthetic value is considered to be high.
- 9.1.51. The Hall has communal value in so far as it has been a familiar landmark in the area. It is well known locally and is used for communal events which contributes to its communal value, which is considered to be medium.

- 9.1.52. The immediate setting of the Hall is derived from the formal gardens, moat and parkland that surround the house. However, the Hall and parkland (which is designated at grade II) has far reaching views over the Essex countryside which contribute to the setting of the hall and parkland. The views looking north from the parkland and house have remained untarnished by the 20th century and largely reflect the views that the Hall has always benefitted from.



Chapman and Andre, 1777

Fuller Long HEA Assessment of Impact:

- 9.1.53. Faulkbourne Hall is a building of national importance. It is located in a designed parkland (also designated) which is set within a landscape that has remained relatively unchanged for centuries. The significance of the Hall and Parkland is considered to be high and the views from these assets to the surrounding Essex Countryside contribute to their peaceful and historic setting.
- 9.1.54. The construction of the 50m high pylons and wirescape which will be clearly visible from both the Hall and the RPG will substantially alter the setting of this nationally important place, causing harm to both assets. The outlook from Faulkbourne Hall and Park towards the DOL reflects an unchanging landscape, free of 20th century industrialisation. The impact of the Project will therefore have a negative impact on the significance of the historic environment in this area.

Fuller Long Critique Of NGET Assessment

- 9.1.55. The PEIR has scoped out these highly significant assets from further assessment as the HEBR does not accept that the setting of the Hall and the Parkland extends to the DOL – despite the parkland only being 370m away. The topography slopes downhill from the Hall to the DOL and consequently, views

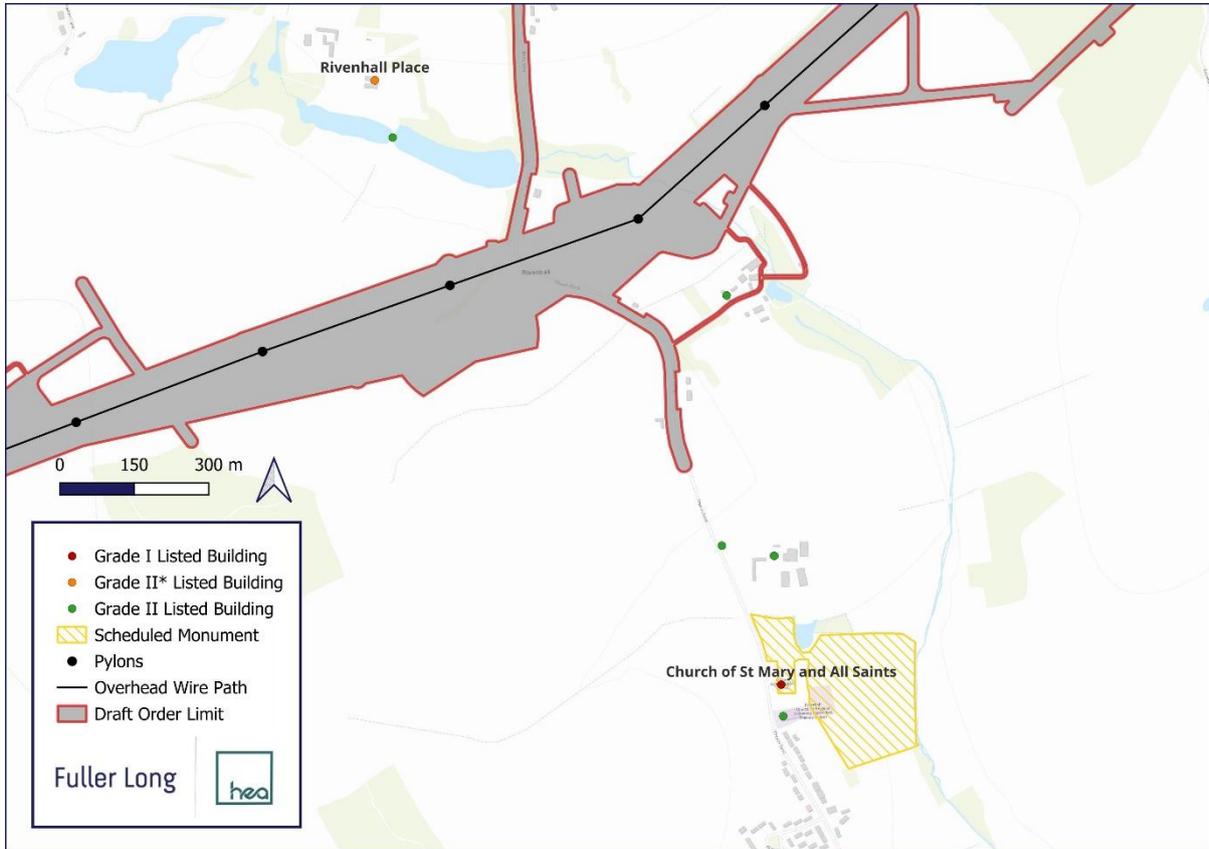
towards the pylons and wirescape will be clear above the tree line from the house and will dominate the landscape looking north from the park.

- 9.1.56. The PEIR acknowledges that *"The setting of the listed assets is informed by their purpose as a medieval to postmedieval manorial estate within a formal designed landscape and within a wider rural agricultural landscape to the south-east of Faulkbourne"* but does not include an assessment of the contribution of the landscape to the north of the Hall where the line will be situated, thus neglecting to fully assess the significance and setting of the assets.



View looking north from Faulkbourne Hall (top) and the grade II listed Registered Park and Garden (bottom)– the pylon route will be visible on the horizon despite wooded belts and hedgerows. All heritage assets associated with the hall have been scoped out.

RIVENHALL PLACE (1122598), CHURCH OF ST MARY AND ALL SAINTS (1169594) AND SCHEDULED MONUMENT (1013831)



Rivenhall Place (©Strutt and Parker). The pylons will extend across the background of this photo

Location: House: 350m from Project. Parkland behind: bisected by project



Rivenhall Church (©Google Earth Streetview) with open views beyond towards the proposed line.

Location: 720m from DOL

NGET ASSESSMENT OF SIGNIFICANCE AND CONTRIBUTION OF SETTING

Rivenhall Place:

"The high value Grade II listed 'Rivenhall Place' (1122598) and the medium value Grade II listed 'Bridge to Rivenhall Place' (1338253) are of evidential, historical, and aesthetic value. The assets are located approximately 350 m and 230 m north-west of the draft Order Limits respectively. The house is accessed via a tree-lined avenue heading south-west from the junction of Western Road, Park Gate Road, and Park Road. The three-storey house dates between the 16th to 18th centuries and is located within its own grounds, with a stream enlarged into a lake and approached by brick bridge across the lake. The original red-brick eastern section of the house dates to the 16th century with the house considerably altered in the 18th century. The garden has a stone balustrade on the south side, with a flight of steps. The bridge was originally built in 1693 and was rebuilt in 1963.*

The setting of these asset is informed by their presence as post-medieval manor within a managed landscape and wider rural agricultural landscape. The original setting of these assets would have been as a high-status estate designed to have intervisibility with its wider surrounding rural agricultural landscape. This asset broadly retains its historic setting which makes a considerable contribution to the setting of the assets. There is likely to be intervisibility between these assets and the draft Order Limits partially restricted by surrounding established trees and hedges between the assets and the draft Order Limits. The setting of these assets extends within the draft Order Limits".

St Mary's and All Saints Church:

"The high value Grade I listed 'Church of St Mary and All Saints' (1169594) is of evidential, historical, and aesthetic value. The church is located within, but excluded from, the scheduled monument 'Romano-British villa, Anglo-Saxon hall, cemetery and church site, around the north and east of the church' (1013831) as reported above. The church is located c. 3 km south-east of Silver End, 720 m south-southeast of the draft Order Limits on the eastern flank of Church. A timber framed Anglican parish church of the 10th century was, rebuilt in stone in the late 10th or early 11th century with 14th, 15th, 18th and 19th century extensions and alterations.

Early foundations of the building are evident as above-ground archaeology around the western entrance to the church. A substantial multi-period site (5020) including early medieval period activity (5020, 5061) has been identified in the fields around the church. This asset is also of evidential and historical value and potentially of high value if shown to be related to the listed church or the scheduled villa site. Evidence includes ditches, hearth pits (5020) and earthworks which have the potential to date to this period, however these were infilled in the 1960s and now survive as buried features (Rodwell and Rodwell 1986). Investigations surrounding the Romano-British period villa location described above also identified evidence of continued occupation during the early Anglo-Saxon period when a post-built hall was constructed east of the main villa building. An Anglo-Saxon cemetery was also identified centred around the villa remains and, subsequently, the early medieval timber frame church was built before its replacement with the current church. The villa building itself may also have been reused as an early church or mausoleum in this period (ibid.) Other remains include traces of a possible enclosure wall, a T-shaped corn drying oven and what is thought to be the location of a mill to the east (5020, ibid.). Further early medieval (Anglo-Saxon) evidence has been identified in the form of a 5th to 6th century hearth, pit and well, found during excavations associated with a new sewer trench in 1971.

The setting of the church is informed by its location by its roadside location at the northern limits of the village of Rivenhall. The setting is further informed by its relationship with the surrounding archaeological remains of the scheduled monument that strongly suggest the Roman villa site became the focus of early medieval activity and with the construction of the 10th century timber frame church, became the nucleus of the Anglo-Saxon settlement of Rivenhall recorded in the Domesday Book. The surrounding agricultural landscape with which the asset and the Rivenhall settlement have a historical relationship also contributes positively to the character of the setting. The setting of the church, therefore, makes a considerable contribution to its value, and due to open, commanding views across fields to the north-west, the setting extends to the draft Order Limits".

Scheduled Monument:

"The high value scheduled monument 'Roman villa, Anglo-Saxon hall, cemetery and church site, around and to the north and east of St Mary and All Saints Church' (1013831) is of evidential and historical value and located c. 2.5 km south-east of Silver End, on the eastern flank of Church Street, 560 m south-east of the draft Order Limits. The monument includes buried foundations, features and deposits

associated with a large 2nd century Romano-British villa complex, comprising at least four buildings, and associated ancillary structures and features and footpath. The villa complex included a long trapezoidal precinct, around the edges of which were buildings. The main house was at the western end, a 'lavishly' decorated winged corridor building, elevated on an earth-filled podium. A second smaller house was located on the north side of the precinct linked by a long-tessellated portico to the bath block. Other buildings, including a watermill, are also described as 'known or suspected, but are unexcavated' (Rodwell and Rodwell 1986). The villa was integrated with the road and field pattern created during the Iron Age, with evidence of geometrical planning of the individual buildings and of the complex (ibid.). A single fine ware fabric pottery sherd (5019) has also been recovered which is also suggestive of high-status settlement activity within this area. An extant building platform on which stands the east end of the Grade I listed 'Church of St Mary and All Saints Church' (1169594) is the only visible element of the monument at the ground surface. A substantial volume of building rubble, a metalled road and cropmarks of a wall have also been recovered at the current location of the Church (ibid.), although the church and all related assets are excluded from the scheduling. The site also contains evidence of an earlier Iron Age farmstead, as well as some Mesolithic, Neolithic, and Bronze Age artefactual material. Several extant early medieval (AngloSaxon) earthworks (buried in the 1960s) have also been identified on the site as well as a post-built hall to the site east of the main villa building. An Anglo-Saxon cemetery also centres around the villa remains as well as an early medieval timber church built over the southern part of the main villa building, with the villa building itself potentially being re-purposed as an early church or mausoleum. Mesolithic, Neolithic, Bronze Age, and early medieval evidence pertaining to this site is discussed in their respective period sections.

The setting of the scheduled monument is informed by its river valley location and by its relationship with a north/south aligned unnamed tributary of the Blackwater river which lies to the south. The setting is further informed by the surrounding agricultural landscape, however, the field systems and trackways which were likely associated with the villa estate have been replaced by post-medieval land division. The setting has been eroded by the imposition of the church, by the residential development of the village of Rivenhall immediately to the south and by the Rivenhall Hall farming complex to the north. The setting of the monument, therefore, makes a moderate contribution to its value, but due to overall distance and its restricted river valley location, the setting does not extend to the draft Order Limits".

ID Number	Name	Grade	Value	Operational Effects	Mitigation	Significance of Effect
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1122598	Rivenhall Place	II*	High	The Project would introduce tall infrastructure within the setting of the asset, causing a minor change to the rural aspect of the asset's setting, which makes a moderate contribution to its value	There is no suitable mitigation to reduce this effect	Not significant negative effect
1169594	Church of All Saints and St Mary	I	High	The Project would result in no change within the setting of the asset	None	Neutral

Pevsner

ST MARYS AND ALL SAINTS, 1838-0. Brick with the use of original walls. Narrow, tall W tower with polygonal buttresses and battlements. The nave has the same feature at the angles. Intersected window tracery as was popular in the early C19. Plain white interior with coved ceiling with thin narrow transverse ribs. C.1700 Stained Glass. The best in the country. Assembled in the E window.

RIVENHALL PLACE. Large Square early C18 house of white brick, hiding late C16 parts. The front is of seven bays, with quoins and segment headed windows. Later Tuscan Porch. The principal staircase has three flights of steps around a square open well. Twistwd balusters. Much C17 panelling also behind C18 facades. The grounds were landscaped by Repton.

Significance

List description, Rivenhall Place grade II*:

An imposing C16-C18 house standing in its own grounds with a stream enlarged to form a lake and approached by a 3 arched brick bridge across the lake. The original house (The east part of the present house) is C16, red brick, with a cross wing at the north end and a tiled roof. The house was considerably altered in the C18 when the east front was refronted and 3 ranges were added to the west end making the whole plan quadrangular. Apart from the -north and west sides of the original block, the general appearance is C18. 3 storeys with parapet. The south and east fronts are 2:3:2 window range, the centre part, of 3 window range, breaks forward slightly, double-hung sashes with glazing balls, in plain reveals and with segmental arched heads. The south front is 6:4 window range and the west part of 6 window

range breaks forward slightly. The garden has a stone balustrade on the south side: with a flight of steps. The original block has a gable at the west end, with a brick coping and the base of a pinnacle at the apex. The gable has an original 3-light window. The roofs are tiled, with 2 original chimney stacks, each with 3 octagonal shafts. The interior has good C16-C18 features including a staircase of circa 1700 with turned and twisted balusters, C16-C17 panelling, C18 panelling and C18 fireplaces.

List description, Church of St Mary and All Saints grade I

Anglican parish church. C10 timber church, rebuilt in stone in circa late C10 or early C11, chancel extended circa early C14, west tower and west end of nave rebuilt in early C18; remodelled in 1838 by J A Repton; altered and south porch built in 1878. Rendered flint and brick. Slate roofs. Plan: Nave and chancel; chancel extended in circa early C14; west tower and west end of nave rebuilt in early C18; south porch added 1878. Exterior: Nave and chancel with polygonal corner turrets, parapets with moulded cornices, the nave with battlements. 2-light Y-tracery chancel windows and 3-light intersecting tracery nave windows and chancel east window. Render partly stripped from chancel revealing small round-head lancets and blocked window on N side. Circa 1300 double chamfered N doorway and C15 S doorway. Tall thin 4-stage west tower with polygonal corner turrets and embattled pinnacles, battlements, 2-light Y-tracery bell-opening and west window and large 2-centre arch west doorway. Interior: Plastered walls and coved ceiling with transverse ribs. Circa 1700 Communion rail. Late C19 pulpit, eagle lectern, benches and choir stalls and font. 1904 organ by J W Walker. Hatchments. Royal Arms of James II. Monuments: Ralphe & Elizabeth Wyseman 1594, fine marble and alabaster tomb with kneeling figures and recumbent effigies; other monuments include Thomas Western 1699, William Western 1729, Charles Western MDCCC and other C19 memorials. Stained glass: exceptionally fine French glass reassembled in east window from St Martin at La Chenu of C12, circa 1200 and circa 1500 and fragments of medieval glass in nave windows.

List description, Roman villa, Anglo-Saxon hall, cemetery and church site, around and to the north and east of St Mary and All Saints Church, Scheduled Monument

Romano-British villas were extensive rural estates at the focus of which were groups of domestic, agricultural and occasionally industrial buildings. The term "villa" is now commonly used to describe either the estate or the buildings themselves. The buildings usually include a well-appointed dwelling house, the design of which varies considerably according to the needs, taste and prosperity of the occupier. Most of the houses were partly or wholly stone-built, many with a timber-framed superstructure on masonry footings. Roofs were generally tiled and the house could feature tiled or mosaic floors, underfloor heating, wall plaster, glazed windows and cellars. Many had integral or separate suites of heated baths. The house was usually accompanied by a range of buildings providing accommodation for farm labourers, workshops and storage for agricultural produce. These were arranged around or alongside a courtyard and were surrounded by a complex of paddocks, pens, yards and features such as vegetable plots, granaries, threshing floors, wells and hearths, all approached by

tracks leading from the surrounding fields. Villa buildings were constructed throughout the period of Roman occupation, from the first to the fourth centuries AD. They are usually complex structures occupied over several hundred years and continually remodelled to fit changing circumstances. They could serve a wide variety of uses alongside agricultural activities, including administrative, recreational and craft functions, and this is reflected in the considerable diversity in their plan. The least elaborate villas served as simple farmhouses whilst, for the most complex, the term "palace" is not inappropriate. Villa owners tended to be drawn from a limited elite section of Romano-British society. Although some villas belonged to immigrant Roman officials or entrepreneurs, the majority seem to have been in the hands of wealthy natives with a more-or-less Romanised lifestyle, and some were built directly on the sites of Iron Age farmsteads. Roman villa buildings are widespread, with between 400 and 1000 examples recorded nationally. The majority of these are classified as 'minor' villas to distinguish them from 'major' villas. The latter were a very small group of extremely substantial and opulent villas built by the very wealthiest members of Romano-British society. Minor villas are found throughout lowland Britain and occasionally beyond. Roman villas provide a valuable index of the rate, extent and degree to which native British society became Romanised, as well as indicating the sources of inspiration behind changes of taste and custom. In addition, they serve to illustrate the agrarian and economic history of the Roman province, allowing comparisons over wide areas both within and beyond Britain. As a very diverse and often long-lived type of monument, a significant proportion of the known population are identified as nationally important.

Part excavation at and around Rivenhall Roman villa has confirmed that the monument survives well and exhibits a great diversity of surviving remains from the Iron Age through into the Roman and Anglo-Saxon periods. It is one of the most extensive villa complexes yet investigated in Britain. The continuity of occupation and settlement evidence from the Iron Age right through to the present day adds to the significance of the monument for our understanding of the changing economy and social structure of the rural population. Such continuity is rare in many parts of the country. The surviving structures and deposits contain information on the construction and layout of the villa and associated buildings, their function and use. In addition the associated artefactual information and environmental deposits will add to understanding of the lifestyle and economy of the inhabitants and the landscape in which they lived. The remains of the Anglo-Saxon ecclesiastical structures at this site are also of great interest, representing as they do one of the very few instances nationally where an early church site is thought to have developed out of a major Roman villa site.

Details

The monument includes a Roman villa complex situated on the crest of a north-south ridge and on an east facing slope towards the Cressing Brook, which runs south to the River Blackwater. The monument comprises at least four major Roman buildings and a variety of associated structures and features. These all survive as buried foundations, floors and occupation deposits. The only trace of the monument

visible from the ground surface is the pronounced building platform on which the east end of St Mary and All Saints Church is located. The extent of the remains are known from a combination of excavation results, soil, crop and parch marks indicating the locations of associated field systems and other buried features. The site was originally noted as containing the remains of Roman buildings in 1846. Following various rediscoveries of the remains over the next hundred years the Roman Essex Society undertook fieldwalking and a number of small trenches were opened in 1950 with further excavations the following year. The Essex Archaeological Society undertook further excavations in advance of a sewage scheme cutting through the site in 1971, followed by further excavations and investigations around the church in 1972-3. The main villa building lies on the west side of the complex aligned north-south and its southern rooms are located below the eastern end of the parish church. Partial excavation of the area indicates that the building measures c.60m long with a maximum width of c.25m including short wings to the east and west at both ends of the building. To the north east is a second building, located during excavations in 1846, 1892, 1950-2 and 1955, believed to have been domestic in use, running east-west, and connected with a paved corridor to a bath complex further east. The main domestic building is believed to have been disposed around a courtyard or garden on three sides and is c.36m long with the corridor to the bath house running east for 40m from the south east corner. The traces of a fourth building were recovered between 1971 and 1973 c.60m to the south east of the main villa building. The walls were constructed with a masonry footing most probably for a timber superstructure, while pads of rubble were the footings for internal posts. The building has been interpreted as an aisled barn relating to the agricultural activity of the villa estate. Between and around these buildings are a number of metalled areas and rubble spreads as well as traces of an east-west road which crosses the Cressing Brook heading east towards Canonium (modern Kelvedon). To the south, cropmarks of linear features have been noted. These indicate the locations of field boundaries some of which, where investigated, have been dated to the Late Iron Age. The villa, therefore, superseded a Late Iron Age farmstead with associated field system. This Iron Age field system appears to have continued in use after the construction of the masonry buildings forming the villa complex. The location of a further building in the southern part of the site has been identified from a surface scatter of building material and pottery which was noted when the field was under plough. In the north west corner of the site, to the north of the church, Roman burials were recorded in the 19th century. Further Roman burials are believed to survive in the north east part of this area. Work in 1971 identified several other Roman features to the north of the church including ditches and hearth pits. In addition this area had a number of extant earthworks, believed to date to the Anglo-Saxon period. These were infilled in the 1960s and now survive as buried features. Other remains which have been identified include traces of a possible enclosure wall, a T-shaped corn drying oven and what is thought to represent the location of a mill on the eastern side of the monument. Mesolithic, Neolithic and Bronze Age artefactual material has also been recovered from partial excavations of the site and includes *in situ* material from a buried soil horizon. The earliest features recognised during the various excavations were dated to the Early Iron Age. Some of the

enclosure ditches are believed to date to the Middle pre-Roman Iron Age indicating the continuity of occupation from the Iron Age into the Roman period. After the end of the Roman period the site was occupied during the early Anglo-Saxon period when a post built hall was constructed in the central part of the site east of the main villa building. A Saxon cemetery was also centred around the villa remains and, subsequently, an early medieval timber church was constructed over the southern part of the main villa building. It has been suggested that the villa building itself may have been reused as an early church or mausoleum



Chapman and Andre 1777

Fuller Long HEA Assessment of Significance:

- 9.1.59. The values attributable to the above heritage assets of Rivenhall are all considered to be high, as is demonstrated by their descriptions and gradings within the National Heritage List for England. The historical interest of the area is very high, with the scheduled monument providing information on an

Iron age farmstead, a Roman Villa Complex, and an Anglo Saxon Hall which would have existed in tandem with the 10th century adjacent church. This important site has thus been occupied for over a thousand years within the open Essex countryside. Numerous multi-period sites and archaeological finds have also been discovered within the immediate area.

- 9.1.60. Rivenhall Scheduled Monument is also mentioned in Historic England's *Rural Landscapes - Register of Parks and Gardens Selection Guide* which describes the landscape of the Roman Villa as follows:

'Rivenhall (Essex; a scheduled monument) villas have been argued to stand within deliberately designed landscapes with vistas, landmarks and avenues of trees. Both in rural and urban contexts the recovery of plant remains demonstrates the potential of developing a better understanding of this aspect of Roman horticulture. As later, a garden landscape around a villa could flow into the productive estate beyond'.

- 9.1.61. To the north, Rivenhall Place is a building of local and national importance. It is located in a designed parkland (by Repton) with views over the surrounding countryside which contributes to its setting. Its evidential, historic and aesthetic values are considered to be high: A house on this site dates back to the Conquest, and was subsequently owned by the Crown. In the 15th century, it was owned by Anthony Woodville, brother in law to Edward IV. The current house has 16th century origins with an 18th façade. The Hall has links with the painters Hogarth and Landseer. The significance of the Hall and Parkland is considered to be high and the views from these assets to the surrounding Essex Countryside contribute to their peaceful and historic setting.

Fuller Long Critique Of NGET Assesement

- 9.1.62. The PEIR describes the open countryside between the church and Scheduled Monument and Rivenhall Place as being of ancient origin, showing a continuous occupation from the early to middle Iron Age through to the modern period. The proposed Norwich to Tibury line will irrevocably devastate this landscape.
- 9.1.63. The setting of the highly significant church which is located within the Scheduled Monument (720m from the DOL) is considered to extend to the DOL as a result of far reaching views. The PEIR states that *'The surrounding agricultural landscape with which the asset and the Rivenhall settlement have a historical relationship also contributes positively to the character of the setting. The setting of the church, therefore, makes a considerable contribution to its value'*
- 9.1.64. Despite this, the scheduled monument (within which the church is located) has been scoped out as its setting is not considered to extend to the DOL – even though they are in the same place. In addition, the Historic England description of the setting of the Roman Villa of Rivenhall (above) clearly discusses the likelihood of a designed landscape beyond the complex, potentially with *vistas, landmarks and avenues of trees*.

- 9.1.65. The impact of the Project has been identified as neutral. The huge significance of this ancient landscape and the contribution that the landscape makes to the scheduled monument has therefore been disregarded, and the harm that the 50m high pylons will cause to the scheduled monument a mere 560m away has been dismissed without further appraisal.
- 9.1.66. Despite the church being identified as having the potential to be impacted within the HEBR, The PEIR considers that the impact of the tall infrastructure to the setting of the church would result in no change to the setting, equating to a neutral effect. This is clearly nonsense. The pylons and wirescape will be clearly visible to and from the church which has '*commanding views across fields to the north-west*'. The assessment of the impact of the scheme has therefore not considered or cross referenced the description of the church or the contribution made by its setting in the HEBR.
- 9.1.67. Rivenhall Place to the north is a highly significant listed building that is located only 350m north of the Project. The setting of the Place is considered to extend to the DOL. The pylons will run through the parkland which was designed by Repton, which will have a direct impact to this asset and the setting of the house. The PEIR accepts that there is a historic setting comprising '*a high-status estate designed to have intervisibility with its wider surrounding rural agricultural landscape*', and goes on to describe the parkland (identified as an NDHA) surrounding Rivenhall Place as follows:

'The southern corner of the Rivenhall designed landscape (5036) lies within the draft Order Limits to the north-west of Park Road. The draft Order Limits continue through two successive medieval deer parks known by the HER as 'Rivenhall I and II' and two post-medieval parks recorded as 'Rivenhall III and IV' (5094) for approximately 1.2 km. The Grade II listed Rivenhall Place (1122598) and Grade II listed Bridge to Rivenhall Place (1338253) also lie within the landscape portion (5036). The designed landscape (5036) marks the location of a medieval period deer park (Rivenhall I) which later doubled in size (Rivenhall II) (5094) and was then overlaid by post medieval alterations made by Humphry Repton around the house (1122598) approximately 340 m north of the draft Order Limits (5036). The location of Rivenhall I is first mentioned in 1295 but is likely to predate this date, possibly around the late 10th century. The park doubled in size to become Rivenhall II in the 12th century and surrounded by a bank. During the 14th and 15th centuries the park then shrank in size. The Grade II listed Ford Farm's (1122614) construction in the early 15th century reduced the enclosed area further, to approximately 170ha. These assets are of evidential and historical value and of low value.'*

- 9.1.68. Despite being within the DOL, the impact of the Project on the significance of this historic landscape and parkland has not been assessed further, which is contrary to local and national policy. The tall infrastructure will dominate the parkland and setting of the house and will significantly harm the significance of Rivenhall Place and parkland. The construction of the infrastructure will remove some of the recorded area of this asset, negatively affecting its value, but no mitigation is provided, and the

impact is considered '*not significant*'. The loss of part of the parkland to tall infrastructure will cause substantial harm to Rivenhall Place and its setting. This is in contravention of 206 and 207 of the NPPF.

- 9.1.69. Photographs from the walkover surveys within the Rivenhall estate (plates 190 and 191) do not provide an understanding of the proposed line or its impact. The use of AVRs would be recommended to demonstrate views from within the estate.



Rivenhall 1831 (©DiCamillo)

LANGLEYS (1305533), STABLES (1171617), GARDEN BLOCK (1122115) AND REGISTERED PARK AND GARDEN (1000241), & GREAT & LITTLE WALTHAM CONSERVATION AREAS , ESSEX



Location: adjacent to DOL

NGET ASSESSMENT OF SIGNIFICANCE AND CONTRIBUTION OF SETTING

"The medium value Grade II Registered Park and Garden of 'Langleys' (1000241) that also contains the high value Grade I listed building 'Langley's' (1305533), and Grade II listed medium value 'Garden Block to the South of Langleys' (1122115), 'Stables to the North-East of Langleys' (1171617), and 'South Lodge to Langleys Park' (1338466), are of evidential, historical, and aesthetic value. The parkland is located immediately to the north-west of the draft Order Limits, which borders the park's south-eastern boundary. The assets are situated on the eastern edge of the village of Great Waltham and are included within the Great Waltham Conservation Area.

The Grade II listed Langleys parkland (1000241) is a late 19th century formal garden with 20th century additions, set in an early 18th century park and woodland for which Charles Bridgeman produced designs, with early 19th century alterations by Humphry Repton. The Grade I listed house of Langleys (1305533) is a red-brick country mansion, built to an H-plan in three storeys. The entrance front on the west has wings projecting at the north and south ends and a central doorway and windowpiece with Ionic pilasters and garland ornamentation. The garden front to the east is like the west front but with only slightly projecting side wings. Langleys was rebuilt on the site of an earlier house between 1710 and 1719 to designs by William Tufnell for Samuel Tufnell but has considerable 19th century alterations. On the south side of the house stands the Grade II listed garden block (1122115), a rectangular red brick building with rusticated brick quoins, built by Samuel Tufnell in the late 18th century. On the north-east side of Langleys is the Grade II listed stables (1171617), a 17th century red brick and tile building with considerable 19th century alterations. The Grade II listed South Lodge (1338466) lies 300 m to the south of the house, on the northern flank of the A130 to B1008 link road. This red-brick and stucco two-storey building is contemporary with the house, having been built by Samuel Tufnell in the late 18th century.

The setting of these assets is informed by their interrelationships as elements of a high-status country estate. The setting is further informed by their relationships with the non-designated buildings of the estate that contribute positively to its character. Beyond the park's limits to the south and west, the listed buildings of Great Waltham also contribute to the setting and in particular the Grade I listed Church of St Mary and Laurence (1122058), which is visible from the house and from various locations within the parkland.

The setting of Langley's house (1305533) and Langleys parkland (1000241) is also informed by their relationships with the Chelmer Valley to the north and east and the designed view from the house to the east-north-east takes in a picturesque portion of the river and the eastern flank of the valley beyond the limits of the parkland. The setting of the house and parkland, therefore, makes a considerable contribution to their values and, due to the wider reach of the setting, it extends to the draft Order Limits.

The setting of the garden block (1122115) and stables (1171617) is more insular and restricted to their location within the grounds of the house and the parkland beyond. The setting of these assets, therefore,

makes a considerable contribution to their values, but due to its more insular nature, the setting does not extend to the draft Order Limits"

ID Number	Name	Grade	Value	Operational Effects	Mitigation	Significance of Effect
1305533	Langleys	I	High	The Project would introduce tall infrastructure within the setting of the asset, causing a moderate change to the rural aspect of the asset's setting, which makes a moderate contribution to its value	There is no suitable mitigation to reduce this effect	Significant negative effect
1000241	Langleys RPG	II	Medium	The Project would introduce tall infrastructure within the setting of the asset, causing a moderate change to the rural aspect of the asset's setting, which makes a moderate contribution to its value	There is no suitable mitigation to reduce this effect	Significant negative effect

Pevsner

LANGLEYS, Langleys was bought in 1711 by Samuael Tufnell, who was then aged 29. He was a city man of great business acumen as well as taste and sensibility. He sat in Parliament and he wrote poetry. The house is of brick, large and straightforward in plan, built on an H shaped plan and incorporating in the

N wing much of a preceding house of c.1620. The entrance side is 13 bays wide, of which the two angle bays on each side belong to the wings projecting by three bays. On the garden side, the rhythm is the same, but the projection of the wings is slight. There are two and a half storeys, and the hipped roofs are hidden behind a parapet with sunk panels. The the centre bays on the entrance side were brought forward about 1820 to form an entrance hall. But when this was done, the trim of the doorway, windows above, and top pediment were preserved and re-set. The doorway has a broad segmental pediment. Resting, very oddly, on Corinthian pilasters as well as two thin brackets. The curved window is connected with the pediment and has in addition the big ears typical of c.1720, ie. volutes coming down by its side and hung with thick garlands. The central window in the second floor is again connected with the window below and has a raised surround, also typical of c.1720. On the garden side, all this is repeated almost identically. While these decorative refinements were no doubt left to the craftsmen he employed, he seems to have been his own architect for the general plans of the house. Its date is confirmed by the 1719 on the rainwater head..

Significance

List description, Langleys, grade I

A fine early C18 red brick house built on an H-shaped plan and incorporating in the north wing part of an earlier house of circa 1620. It stands in a park of about 100 acres and is approached by a drive from Chelmsford Road. Langleys was bought by Samuel Tuffnell in 1711 and the present house was built in 1719, the date cast in the rainwater heads. 3 storeys. The west front has wings projecting at the north and south ends. The 3 central bays were altered in circa 1820 when the entrance hall was built. There is a panelled parapet, moulded brick cornice and a moulded wood dentilled pediment above the centre part with an embossed coat of arms. 2:2:1:3:1:2:2 window range, double-hung sashes with glazing bars. There is a central doorway and window piece with an 8-panel door with a segmental headed doorcase, fluted Ionic pilasters and side volutes with garlands which unite the doorcase with the windows above. The 1st and 2nd storey centre windows are connected by a raised surround. The east front is similar to the west but with only slightly projecting side wings. The central pediment with the door and window piece is less elaborate than that on the west front and there is a window range of 2:3:3:3:2. The interior of the north wings has 2 unique rooms of the circa 1620 period with remarkable strapwork ornamentation with cartouches and coats of arms. These rooms also have fine chimney pieces of the same period elaborately ornamented. There are many fine C18 rooms, the most important of which is the Salon of 1720, a 2 storeyed room with giant Corinthian pilasters and a tall chimney piece. There are many fine C18 fire surrounds. The house is in an excellent state of preservation and upkeep.

List description, Stables To The North East Of Langleys, grade II

A C17 red brick building with considerable C19 alterations. There are a number of original doorways and windows remaining, Especially in the west block. 2 storeys. Roof tiled, with 2 original gabled

dormers on the north side and 2 on the south side (altered). Langleys, Garden Block at Langleys and Stables at Langleys form a group.

List description, Garden Block To The South Of Langleys, grade II

Originally the laundry block. A rectangular red brick building of the later C18 with brick rusticated quoins. The north and south fronts have a central dentilled brick pediment and cornice. 2 storeys. 2:4:2 window range, double-hung sashes with glazing bars, in plain reveals, with segmental heads. A number of the windows are now blocked.

Langleys, Garden Block at Langleys and Stables at Langleys form a group.

List Description. Park and Garden, grade II

Late C19 formal gardens, with C20 additions, set in an early C18 park and woodland for which Charles Bridgeman produced designs, with early C19 alterations possibly by Humphry Repton.

HISTORIC DEVELOPMENT

The original house at Langleys is of uncertain date, but it belonged to the Everard family in the C16. In 1711 it was acquired, along with 87 acres (c 36ha) of land, by Samuel Tufnell who, according to Morant (1768), was the son of a very rich and eminent London merchant. Tufnell demolished part of the mansion and rebuilt the house in its present form, to designs by William Tufnell (resident architect at Westminster Abbey, no relationship proved). Whilst work on the house was underway Charles Bridgeman (d 1738) was commissioned to lay out the grounds, although apart from a receipt confirming he was paid £156 7s 2d for the work, no further documents or plans survive to give any detail of what was done (Account book, ERO). During the mid C18 Muilman records that the late possessor of Langleys, Samuel Tufnell Esq had 'made a good park round [the house and] laid out pleasant gardens' (Muilman 1769). Chapman and Andre's county map of 1777 provides the first cartographic evidence of the layout of the grounds. Samuel was succeeded in 1758 by his son John Joliffe Tufnell I, and he by his second son, William, in 1794. Writing in *Observations on the Theory and Practice ... of landscape gardening* in 1803, Humphry Repton lists Langleys amongst the sites for which he had produced a Red Book but although a book of farm accounts together with a parish survey map of 1810/16 record developments in the park and garden between 1803 and 1807, no other evidence survives to link Repton to this work. During this period part of the river was ornamented, new plantations were made, a new road cut through the park, and possibly pleasure gardens and the wilderness planted (Estate accounts, ERO). When William Joliffe died in 1814, his son John Joliffe Tufnell II succeeded to the estate and in 1827 he commissioned Charles Robert Cockerell to enlarge the house. John Joliffe II was in turn succeeded by his son John Joliffe III, and the OS 25" map published in 1875 shows that by this date the park had been extended and an elaborate parterre garden had been laid out to the east of the house, all created under J Joliffe III's direction (CL 1905). Colonel W Neville Tufnell succeeded his father in 1894, and under his stewardship the grounds

and the park were retained. Colonel Tufnell died in 1922 and was succeeded by de Hirzel Tufnell who lived at Langleys until his death in December 1935. In January 1936 he was succeeded by John Joliffe Tufnell IV who continued to plan and develop the gardens. The site remains (2000) in single private ownership.

DESCRIPTION

LOCATION, AREA, BOUNDARIES, LANDFORM, SETTING Langleys lies c 8km to the north of Chelmsford, set to the east of the road leading from the A130 to the B1008 Chelmsford to Little Waltham road, on the north-east edge of Great Waltham village. The c 63ha site is set in a mainly rural location, bounded to the west and north by the A130 to B1008 link, and to the south and east by farmland. The ground at Langleys is generally level with a slight slope downwards from the house to the north, towards the River Chelmer, and south towards the Walthambury Brook which flows east to join the Chelmer c 600m east-south-east of the house.

ENTRANCES AND APPROACHES South Lodge (listed grade II) lies c 300m to the south of the house, on the A130 to B1008 link road. This red-brick and stucco two-storey building is contemporary with the house, having been built by Samuel Tufnell in c 1719. The drive runs north through the park to join the west drive, both turning east to arrive at the gravelled forecourt below the west front, in an arrangement recorded on the early C19 parish map. West Lodge (built 1960s) also lies on the A130 to B1008 link road, c 400m to the north-west of the house. The drive divides at the Lodge, the northern arm running south-east directly to the stable block on the north side of the house, while the southern arm curves through the park to meet up with the south drive c 150m west of the west front. This division of the west drive dates from the mid C19, prior to which it ran directly to the stable block. On the north side of the stable block, c 100m north-east of the house, stands the early Victorian North Lodge beside a waterfall on the banks of the River Chelmer. A further lodge, added during the Edwardian period c 600m east of the house, was demolished and rebuilt in 1990.

PRINCIPAL BUILDING Langleys (listed grade I) is a red-brick country mansion, built to an H-plan in three storeys. The entrance front on the west has wings projecting at the north and south ends and a central doorway and window-piece with Ionic pilasters and garland ornamentation. The garden front to the east is similar to the west front but with only slightly projecting side wings. Langleys was rebuilt on the site of an earlier house between 1710 and 1719 to designs by William Tufnell for Samuel Tufnell. It incorporates the north wing of the early C17 house.

On the south side of the house stands the Laundry (listed grade II), a rectangular red-brick building with rusticated brick quoins, built by Samuel Tufnell at the same time as the house. On the north-east side of the house stand the two-storey, red-brick and tile stables (listed grade II) which date from the C17, with considerable C19 alterations.

GARDENS AND PLEASURE GROUNDS The garden lies to the south and east of the house, with the wooded pleasure grounds running north along the banks of the River Chelmer. A wide gravel terrace runs the length of the east front. A flight of steps aligned on the central garden door lead down to the late C19 Dutch Garden, composed of a complex box parterre with gravel paths through it. The gardens were much simplified in 1946 and now (2000) sit on a lawn bordered to the east by a low retaining wall. In the centre of the wall a large, low flight of semicircular steps leads down to a long lawn flanked by an avenue of cypress trees and mixed shrubs which terminates at a canal c 180m east of the house. A canal is shown on the 1777 county map (Chapman and Andre) at the end of an elaborate formal garden which had disappeared by the early C19, leaving only a ha-ha thought to date from the Bridgeman period (Inspector's Report 1988). The existing canal, which was lined with concrete in the mid C20, may have been part of Charles Bridgeman's work although the map evidence is not conclusive in locating the exact position of the C18 canal. The east garden is bordered to the north by a brick wall dividing it from the stable buildings to the north. A row of mature lime runs along the garden side of this wall.

The lawn at the southern end of the Dutch Garden, to the east of the Laundry and the wall enclosing the drying ground, is planted with a variety of shrubs. It is bordered to the south by the north wall of the kitchen garden which is entered through a gateway at the south-west end of the lawn. Beyond the west wall of the kitchen garden is the walled drying ground reached via the Laundry which now (2000) contains a swimming pool, built in 1939.

The pleasure grounds lie on the north side of the stables and consist of walks through woodland planted on the banks of the River Chelmer. The walks pass several features including the remains of a thatched icehouse and are shown as wooded on all the maps of the park from 1777 onwards. Ornamental works were carried out to the river at the beginning of the C19 when a waterfall was created, together with a sluice c 100m above it, used to divert the water thus making a small island. Earthworks in the park immediately to the south of the pleasure grounds are evident in the form of two raised banks with flattened tops with a ditch in between. These may represent part of the Bridgeman layout (ibid).

PARK The park at Langleys surrounds the house on all sides apart from the area to the north-east beyond the River Chelmer. The north-west section, added during the C19, is bounded to the west and north by the mid C19 Howe Street Plantation which encloses pasture fields. Close to the river are late C20 cricket-bat willow beds. The old deer park lies to the west of the house and is retained as pasture, well covered with parkland trees including ash, horse chestnut, oak, and cedar, together with a walnut avenue planted in the mid 1950s. This area is shown as parkland on the 1777 Chapman and Andre county map and it is here that Charles Bridgeman's designs were carried out.

The south-east section of the park is divided by Walthambury Brook which comes through the village and runs into the park to the north-west of South Lodge, exiting through Whites Plantation on the eastern boundary. The southern part of this area was under arable production up until the mid C19 when the park was extended and has, in the C20, been returned to farmland.

Immediately to the east of the house, beyond the canal, the view into the park from the gardens towards Chatham Hall looks over farmland scattered with a few mature trees. Up until the mid C19, the park extended in this direction only as far as the River Chelmer, but was extended in the late C19 as far as Chatham Hall. The boundary between the two properties however is not defined on the OS 6" map of 1874. The boundary of the site here registered lies just to the west of the river.

KITCHEN GARDEN The walled kitchen garden lies c 60m to the south-east of the house and is divided by paths into areas used for the production of fruit, vegetables, and flowers. There are six entrances to the garden, the main one being in the north-west corner, marked by an ornamental iron gate flanked by railings attached to tall red-brick piers surmounted by eagles. The walled garden, which was built to accompany the 1719 house, was, according to map evidence, twice its present size until the early C19



Chapman and Andre 1777

Fuller Long HEA Assessment of Significance:

- 9.1.71. The special interest of Langleys and its associated estate and designed parkland is related to the historic, evidential and aesthetic interest of the assets which are considered to be high. The historic and evidential values relate to the great age of the estate and the number of archaeological finds in the area. Records show that a manor house and deer park has stood at this site since King John. The old mansion was pulled down and replaced with the current house in the early 18th century and the parkland surrounding

the property was also extended at this time (which involved the diversion of the Chelmsford Road). The historic and aesthetic values of the house relate to its simple, classical design in a square plan which was becoming fashionable at the beginning of the Georgian era following the Baroque period. The parkland surrounding the grade I mansion were designed by Charles Bridgeman and were later altered (possibly by Repton) are also of high significance.

Fuller Long Critique Of NGET Assessment

- 9.1.72. The proposed route of the Norwich to Tilbury line will bisect the countryside between Great Waltham and Little Waltham and will negatively impact a large number of heritage assets passing very close to two conservation areas and a registered park and garden.
- 9.1.73. The HEBR describes how views from Langleys and its parkland to the agricultural landscape beyond contribute to the setting of the parkland and the house, and make a considerable contribution to the setting of the conservation areas, which extend to the DOL. The HEBR does not identify the settings of the Stables or the Garden Blocks extending to the DOL, despite the setting of these assets being informed by their interrelationships as elements of a high-status country estate which contribute to the group value of the House and Parkland.
- 9.1.74. Despite the understanding of the contribution of the rural landscape to the setting of the assets, the impact tables within the PEIR only attribute a moderate contribution made by the land over which the project will run which will be moderately impacted by the Project. Yet again, this contradicts the initial assessment in the HEBR which recognises that the setting makes a considerable contribution to the value of the assets. This highlights the lack of cross referencing within the PEIR and the inadequacy of the matrix assessment tables which lead to an incorrect assessment of value and impact. The PEIR consequently fails to take into adequate account the negative impact the pylons will have on the landscape and consequently the significant harm that will arise as a result of the proposed scheme on Langleys, the associated designated estate and park and the conservation areas of Great and Little Waltham.



View from Langleys across the RPG towards the route of Norwich to Tilbury, which will permanently change the skyline and setting of this grade I listed asset.

- 9.1.75. The wireline visualisations produced in Volume II provide an image of Langleys, and the impact of the scheme on the setting of the house. From Viewpoint 6.18, the pylons appear the same height as the house and compete with the historical setting of the property (see below). The wireline visualisation from within the Parkland was taken from a central point, rather than from a point near to the Project, which would have demonstrated a much larger impact to the skyline.



View looking south-east towards Langleys, illustrating the impact of the tall infrastructure that runs behind the Hall. (Figure No: 13.9.79b Viewpoint 6.18: Langleys Park Great Waltham).

INGATESTONE HALL (1187315) AND ASSOCIATED LISTED BUILDINGS AND SCHEDULED MONUMENT, ESSEX



Location: 1km from DOL

NGET ASSESSMENT OF SIGNIFICANCE AND CONTRIBUTION OF SETTING

"The high value scheduled monument 'Barn at Ingatestone Hall' (1002174) (also Grade II listed - 1298752 - 'Granary 130 Metres North West of Ingatestone Hall') is located within the wider complex of Ingatestone Hall listed buildings centred 130 m east of Hall Road, c. 590 m south-east of Ingatestone, c. 780 m west of the draft Order Limits. The other listed buildings in the complex comprise: the high value grade I listed 'Ingatestone Hall' (1187315); the high value Grade II* listed 'Gatehouse and courtyard ranges 30 metres west of Ingatestone Hall' (1197286); and the medium value Grade II listed 'Barn (now workshop) 100 metres west of Ingatestone Hall' (1187269); 'Byre 80 metres north west of Ingatestone Hall' (1197287), a 'Shelter shed and attached byre 100 metres north west of Ingatestone Hall' (1197288), a 'Barn 110 metres north west of Ingatestone Hall' (1297189), 'Lodge cottages 170 metres north west of Ingatestone Hall' (1187393), 'Cistern house 50 metres north east of Ingatestone Hall' (1187282), 'Garden wall extending 48 metres north from the gatehouse and courtyard range' (1187300); and 'Garden Wall North and East of Ingatestone Hall' (1297190). As a group, these assets are of high value and have historic, evidential, and aesthetic value.*

The history of the estate began in 950 AD when King Edgar granted lands in Yengeatte-Stone (Ingatestone) to the Abbey of Our Lady and Saint Ethelburga. The Sisterhood built a manor house within their lands. Later in 1535 King Henry VIII ordered his chief secretary, Thomas Cromwell, to inventory all religious order strongholds, this was beginning of the Dissolution. Cromwell proctor or assistant, William Petre, was tasked with visiting the monastic houses in southern England. Petre took a particularly liking to the manor in Ingatestone and soon leased and later bought the land. To absolve Patre of any wrongdoing during the Dissolution and Interdict of Excommunication imposed on Henry VIII, by Pope Paul IV, providing that Patre endowed an almshouse (this was located on Ingatestone High Street). Petre demolished the manor and replaced it with the present Ingatestone Hall. The Tudor style Hall (1187315) was built out of red brick with English bond over three stories. The roof has crow stepped gables with peg tiles with prominent octagonal and rectangular chimney stacks. The house was originally square in shape with a central enclosed courtyard. It was one of the first private houses to be built with piped water supply and flushing drains. It is thought that the ninth Lord Petre, Robert Petre, added the north wing to the house and demolished the Great Hall and dining chamber. This left the property 'U' shaped. In 1919 the house was in a state of decay. It was the 16th Lord's widow, Lady Rasch, who undertook the task of sympathetically restoring the property. During World War II the house became a Wanstead School for girls. Later in the 1950s the hall also housed Essex County Council Record Office. Today the Petre family still own and occupy the estate (Visit Ingatestone Hall).

The scheduled and Grade II granary (1002174/1298752) was constructed in the late 16th century out of red brick with a special form of Flemish stretcher bonds. It has two stories, and the roof is clad in hand made tiles. The granary is large for its size and a rare survival from the 16th century given that it*

is also largely unaltered. A barn that was included in the scheduling was appended to the granary to the north, but this has been replaced by a modern structure.

The Grade II* gatehouse and courtyard (1197286) are located to the west of the hall. The building dates to the 15th and 16th centuries and altered in the 18th century. It is constructed of red brick in English bond and plastered timber frame and has a roof of handmade red clay tiles. It is 'L' shaped in plan and of two stores. The first-floor external walls are clad in plaster, with slight panelled decoration, and painted red. The west range has a central arched entrance way with a jettied room and clock tower above. The clock has one hand and 'Sans Dieu Rien' (a heraldic motto meaning 'Without God Nothing') written beneath it. Above the clock tower is a bell and weathervane.

The Grade II listed byre (1197287) dates to the mid-19th century and is constructed of red brick in a Flemish bond with dressing of black engineering bricks and a red clay 'Roman' tiled roof. The building is a good example of a scientifically designed byre from the 19th century agricultural improvement era and the use of engineering bricks to resist abrasion at the cattle entrances is noteworthy.

The Grade II listed barn (1297189) dates to the late 16th century and comprises a gas tar treated weatherboarded timber frame structure with a handmade tile clad roof. Internally there are some original features and later additions. All are of good quality and well-maintained, mainly due to the use of high-quality oak.

The Grade II listed shelter shed with attaches byre (1197288) comprises two walls of 16th century origin with the rest of the structure dating to the early-to-mid 19th century. The structure is built of red brick in Flemish stretcher and Flemish bonds and is roofed with handmade red clay tiles.

The Grade II listed lodge cottages (1187393) are of two stories and were constructed in the 19th century in the Tudor Revival style of red brick in English bond with a handmade red clay tile roof. The front elevation has gable ends with crow stepped edges, as can also be seen on the gable ends of the hall. The transomed casement windows are large and reminiscent of those seen at the hall.

The Grade II listed barn (1187269) at the southern edge of the complex is now a workshop. It was constructed in the 13th to early 14th century and rebuilt in the early to mid-16th century. It is of timber frame construction faced in mixed materials comprising plaster, weatherboarding, and red brick in English and Flemish bond. The roof is clad in red clay 'Roman' tiles. The early origins of this building and its retention of original and 16th century fixtures, fittings and building material make this building a rare example.

The Grade II listed north is garden wall (1187300) is of red brick in English bond and dates to the 16th century. It is aligned north/south and its southern end butts up against the gatehouse and courtyard range. The asset dates to the 16th century and is recorded on a plan of 1566 and a map by the John Walkers, father, and son, 1605, as forming the west boundary of a garden, as it still does. 3.8.74 The Grade II listed garden wall (1297190) to the east of the hall also dates the 16th century but it was partly

rebuilt in the 18th to 20th centuries. It is built of red brick in English and Flemish bond and encompasses the garden of the hall. The asset was recorded on a plan of 1566 and in a detailed map by the John Walkers, father, and son, published in 1605. Although it has been partially rebuilt, its early construction date and retention of some of its original building material make this a rare surviving brick feature from this time.

Located within the walled garden to the east of the hall is the Grade II listed cistern house (1187282). It was constructed in the 19th century, or possibly earlier. It is made from red brick in English bond and has a single storey. The roof is clad in handmade red clay tiles. The building is circular in plan with a door at its northern side. This building is a rare example of its type.

The setting of the Ingatestone Hall complex is shared and informed by the interrelationships between the designated assets and by their relationships with the associated non-designated outbuildings that add character to the working farm environment. The setting is further informed by the surrounding quiet rural agricultural landscape with which the assets and the non-designated associated outbuildings have a historical and functional relationship. A copse to the west and a mature wooded boundary to the south of the complex obscure views in and out, but there are more open views to the north through to the east. To the east is the shallow Wid valley and a footpath links the Ingatestone complex with the Grade II* listed Church of St Mary (1264434 - see Section F) on the opposing eastern flank. The large garden areas to the north, east and south of the hall instil a sense of status and openness and despite mature tree lined boundaries views are available across the arable land to the north and the Wid valley and the church beyond in the east. The setting of the assets, therefore, makes a considerable contribution to their values and except for the two garden walls (1187300, 1297190) and the cistern house (1187282), whose settings are restricted to the confines of the Ingatestone Hall complex, the shared setting of the remaining listed buildings and the scheduled monument extends to the draft Order Limits".

ID Number	Name	Grade	Value	Operational Effects	Mitigation	Significance of Effect
1187315	Ingatestone Hall	I	High	The operational phase would cause no change to the rural aspect of the asset's setting, following reinstatement post-construction, which makes a moderate contribution to its value	Reinstatement of damaged/ removed historic field boundaries and earthworks	Neutral

Pevsner

INGATESTONE HALL Ingatestone was a manor of the nunnery of Barking. In 1539, it came into the hands of Sir William Petre, son of a wealthy tanner in Devon, protégé of Cromwell, busy in the commissions for the dissolution of the monasteries, Secretary of State and Chancellor of the Order of the Garter. The house is of brick and was externally complete by 1548, though interior work seems to have gone on to c.1560. It consisted originally of a base court, a middle court and an inner court. What remains is chiefly the inner court, though shorn of its W range, which contained the Great Hall. This lay between middle court and inner court and was pulled down c.1790-1800. One enters the former base court by a GATEWAY remodelled and provided with its pretty bell turret in the C18. The remaining three ranges of the main structure are still entirely lacking in the systemization which is characteristic of the Elizabethan style and exists in some of the leading buildings already before her time. On the other hand, the mullioned and transomed windows already have the Elizabethan form without arches to the top of the lights. The most striking external feature is the stepped gables.

Significance

List description, Ingatestone Hall, grade I

Country_house. 1539 and 1556. By William Petre. C18 alteration and C20 (1935-7) restoration of windows and interior. Red Tudor brick in English bond - some burnt headers. Stepped gables, peg-tiled roofs with prominent stacks, octagonal and rectangular shafts considerably restored as are many areas of walling as a consequence of alteration and reconstruction. PLAN: 3 ranges round a court, N S and E. Originally also a west range that contained the Great Hall but demolished between 1790-1819 together with the division of 2 outer courts, a middle and a base court that led to the gatehouse to the W (qv). EXTERIOR: Courtyard, W elevation of E range: 2 storey, brick plinth 4 window range, all windows hollow chamfer moulded transoms and mullions, partly restored. All lights have C20 metal casements with leaded panes. Ground floor, 2 inner windows 4x2 lights 2 outer ones. 3x2 lights. 3 doorways. 4 centre arched heads with C20 oak boarded doors - large central one - C20 build with impost capitals and double leaf door. 2 outer doors between windows, one to N has a rebuilt head. Blocked segment headed window adjacent to S door. First floor, three 5x2 light windows plus one 3x2 (rebuilt) at S end. Central pair have some stained glass. Courtyard N elevation of S range: similar to E range. At E end, projecting octagonal stair tower rising above roof eaves, brick cornice with later upper crenellated parapet and 4 staggered windows with 2x2 lights partly rebuilt. Ground floor of S range - 4 windows considerably rebuilt, one 5x2, two 4x2 and one 3x2 (to E). To W, recessed doorway with a timber wall bearer in front, metal grid and gauze infill. Towards E end, blocked original doorway, adjacent and below E window, an C18 mounting block of two steps. First floor - 4 windows partly rebuilt over those below. 2 outer 5x2 lights, 2 inner 4x2. W end has small octagonal stack at stepped gable apex. C18 addition to W end in Tudor style set back to S crenellated with 2x1 ground floor window. Courtyard, S elevation of N range:

similar to Sand E ranges, but walling considerably rebuilt, straight joints and differing brick evident. Range somewhat irregular. Ground floor - three windows of 4x2 lights, blocked segment headed C18 window at E end. Central doorway. First floor, two 5x2 light windows, one 4x2, one 2x2. Blocked rectangular opening towards W end with timber lintel and sill. Stack at E end, base original, rebuilt rectangular shaft with corbelled top. W end of range has C18 addition in Tudor style breaking forward with mid height window of 3x3 lights, some stained glass. Further W C18 crenellated block set back to N, (similar to one added to S range). Ground and first floors both have 5x2 light windows. Both C18 added blocks have stepped gables to W. E range, exterior E elevation: similar to W elevation with central C20 stepped gabled block on site of former C18 chapel. To S, projecting shouldered stack, rebuilt upper square shaft, further 2-storeyed step gabled projection with small stack at apex and 2x2 light upper window. Between projection - ground floor, two 4x2 light windows, first floor, one 5x2 window and one E C18 sash window 3x4 panes replacing site of earlier window. S end, windows, ground floor one 2x1 lights, first floor one 2x2. N end of range, C18 stair tower in chequered burnt header brickwork with central pilaster buttress and later crenellated parapet. Between tower and central projection, irregular infill C19 stack and ground floor doorway with adjacent C20 3x2 light window, also buttress with an original 5x2 light window each side on first floor. At N end of range, short length of domestic courtyard wall with shaped coping bricks abuts C18 tower. S range exterior S elevation: 2 storey and attics, irregular facade with original central ground floor doorway and adjacent massive triple shafted external stack to E. To S stepped gabled projection (end of E range) with ground and first floor 3x2 light windows. Between these units - ground floor 4x2 light and first floor 3x2 light windows. Above, gabled dormer window of 4 casements each 3x4 panes; similar dormer window above central doorway, below, 2x2 light window on first floor. E end of range, side of stepped gabled end with ground floor 2x1 light window. W of central doorway, stepped gabled projection with rebuilt octagonal stack and ground floor single light window; C20 'Tudor' doorway and 3x2 light window above. To W, twin facade gabled projection with crow-steps and small apex stacks, ground and first floors have two 5x2 light windows, attic window in each gable, 3x1 lights. W end, C18 crenellated addition, set back, ground floor room with 3x1 window; behind 2 storeyed, with first floor 2x2 window. N range N exterior elevation: central 2 storeyed C18 wing with hipped roof deeply projecting to N. E side of this unit, ground floor; doorway with C20 door and 4 simple casement windows, pantiled shed at N end running to E. First floor S-N 2 sash windows, weatherboarded surround 3x4 and 4x4 panes; 3 similar sash windows with segment heads. 4x4 panes. W side of C18 N wing has a 'Tudor' style 2x2 window on ground and first floors. N end, ground floor, segment headed doorway with boarded door and segment headed window with C20 double casement 4x4 panes. E of C18 wing, small domestic courtyard wall with shaped brick coping and containing 3 segment headed low openings with bars on simple metal casement windows. Interior of courtyard irregular with projecting gabled shed, original range behind to S with central rectangular stack at roof apex. To W, 4x4 paned sash window, to E stepped facade gable with 3x2 light window on first floor. C18 corner tower at E end with 2x2 light window. W of projecting C18 unit, C16 block, restored and enlarged,

similar to additions to S range. E-W twin facade stepped gables with ground floor doorway (now with glass door), small 2x1 light window to E and 4x2 light window to W. First floor, 2 similar 4x2 windows. To W C18 3-cant bay window through 2 storeys, embattled with stepped gable and finial behind. Bay windows, 2x2, 3x2, 2x2 lights on both floors. W end blank, embattled with slim external stack. Twin shafted stack in internal angle with bay window. W end of N and S ranges: N range has plain embattled end wall of C18 addition with restored stepped gable end of principal range behind and offset to S, ground and first-floor windows, both 5x2 lights. S range W end, 2 storey and attic step gabled end with octagonal finial. Ground floor windows, one 4x2 lights, one 2x2, first floor, one 5x2 lights, attic window in gable, 4x2 lights. To S, projecting embattled end wall of C18 addition with plain ground floor embattled wall of further addition set back to S. INTERIOR: considerable alteration took place in the C18 and also in 1935-7 when panelling and mullioned and transomed windows were re-instated as well as doorways and ceiling joists. Some panelling is genuine and in situ some genuine but moved and some clearly C20. This drastic work has also made the plan of the house, shown in the RCHM volume, markedly different from that now seen. Consequently, the room names, used in this description are derived from a current plan prepared for Lord Petre prior to opening the house to the public. Principal historic features are: S range: the drawing room retains the form of a small late medieval hall with lateral fireplace and paired cross-entry doorways at W end. Also, projecting octagonal stair with original newel post at high E end leading to principal chamber above. (RCHM noted mortices in ceiling joists for low end screen - evidence now removed). Panelling c1600 also mid-C16 door frames. Fireplace c1600 cut down and re-assembled - most noteworthy in house with strapwork and grotesque decoration (derived from demolished Great Hall?). Adjacent to S, second projecting stair tower with reconstructed stair of c1600 style occupying tower and C20 S addition. Walled-off 'priests hole' in tower void, access from stair. E range: S end - old study has another similar 'priests hole' behind stack to adjacent stone hall. Old study has E C17 panelling comprising rectangle within rectangle and L-shaped corners, also strapwork decorated pilasters. The central stone hall also has panelling of c1600 but probably re-set. Fireplace of c1600 with flattened arched head and high set chamfer stops on jambs. N range: ground floor much altered - only stone fireplaces of late C16 remain from Tudor times. S range - first floor: Lord Petre's bedroom, a great chamber over the hall below; has c1600 panelling in situ with roll moulded ceiling joists crossed to create decorative panels. E range - first floor: Long gallery "fayr and stately gallery or walke mete for any man of honor to come into" - 1566. Ceiling was elliptical in section, now flat, early oak floorboards but frequent change in orientation suggests subdivision of the room at some time and now re-instatement of original plan. Stained glass in windows, some glass apparently derived from C18 chapel that once projected to the east. To S, Queen Anne room, still has C18 sash window with thick glazing bars. Exterior of outer frame though has C19 bead decoration. The room has E C18 pine panelling and fireplace with contemporary black marble bolection moulded surround. Roof above adjacent dressing room original - oak of clasped side-purlin type with curved wind braces - high quality construction. N range - first floor: W end, garden chamber - panelling of c1600. C16 stone fireplace, 4

centred arched head and high set stop to moulded chamfers on jambs. Lightly scratched graffiti in C16 script. Late C16 panelling with frieze containing shields with Petre arms and roundels of Renaissance style medallion heads. Whole wall now containing the frieze, known to have been moved to create passageway behind. HISTORICAL NOTE: the original plan of the house and surrounding garden wall can be seen on a detailed map of 1605 by the John Walkers - father and son. The house is named 'Inge Petre Hall'. The Petre family who have always practised the old faith have lived here ever since and the house is now the home of the eighteenth Lord Petre



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Fuller Long HEA Assessment Of Significance

- 9.1.77. The significance of Ingatestone Hall and its associated estate (including two grade II* listed buildings and a scheduled monument) relate to the evidential, historic, aesthetic and communal values of the assets which are considered to be high. The historic and evidential values relate to the age of the estate and archaeological finds in the area. Records show that a manor has existed here since at least the 10th century. The historic hall was pulled down and rebuilt in a distinct Tudor style in the 16th century, with many of the barns and outbuildings also erected at this time together with the formal gardens enclosed by brick walls surrounding the house. Evidence of the previous manor and estate still exist, with the grade II* listed gatehouse and courtyard and a grade II listed barn dating from before the 16th century. The associative value of the Manor is derived from the Petre family who have consistently occupied Ingatestone Hall since the dissolution of the monasteries. The first owner, William Petre, originally employed by Thomas Cromwell, served as Secretary of State to three Tudor monarchs and was popular

at court. Elizabeth I was received at Ingatestone Hall in 1561 despite the family being known recusants with masses held in secret at a private chapel, and the presence of a priest hole (still present). The historic significance of the Hall is therefore high. The aesthetic values of the house are also high and relate to form and appearance of the building, constructed from red Tudor bricks in a courtyard layout. The unusual Tudor design is characterised by stepped gables and decorative chimney stacks.

- 9.1.78. The immediate setting of the Hall is derived from the historic buildings that make up the estate and from the formal gardens and parkland surrounding the Hall. There are far reaching views over the Essex countryside to the east towards St Mary's Church, Buttsbury. This setting has remained largely unchanged since the Hall was established and the views between Ingatestone Hall and the Church are largely the same now as they were when William Petre rebuilt the Hall in the 16th century. As such, setting contributes considerably to the significance of Ingatestone Hall. The hall and grounds are currently open to the public, who can experience the asset in its original setting. Communal value is also therefore considered to be high.

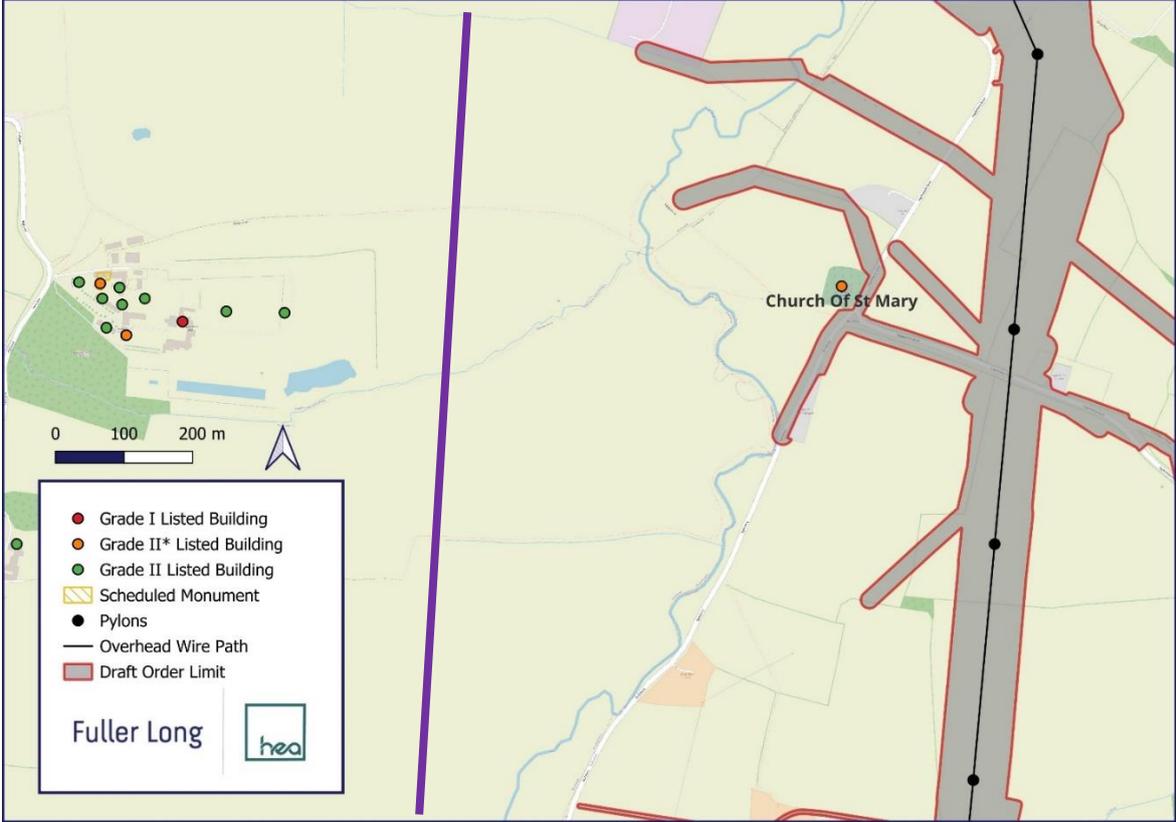
Fuller Long Critique Of NGET Assessment

- 9.1.79. The proposed route of the Norwich to Tilbury line will pass through undisturbed countryside 1.2km to the east of Ingatestone Hall and will negatively impact a large number of heritage assets at the estate. The route was moved further east, beyond St Marys at Buttsbury following the 2022 non-statutory consultation, but the impact of the Project will still be visible from the nationally important Ingatestone Hall and Parkland.
- 9.1.80. The HEBR describes how for the majority of the buildings at Ingatestone Hall setting makes a considerable contribution to their value, except for *'two garden walls (1187300, 1297190) and the cistern house (1187282), whose settings are restricted to the confines of the Ingatestone Hall complex'*. However, the setting of these assets again is informed by their interrelationships as elements of a high-status country estate which contribute to the group value of the hall and gardens. Despite the understanding of the contribution of the rural landscape to the setting of the assets, the impact tables within the PEIR state that the pylons will have a 'neutral' effect on the setting (which makes a moderate contribution to their value).
- 9.1.81. This again highlights the lack of cross referencing within the PEIR and the inadequacy of the matrix assessment tables which has led to an incorrect assessment of the value of the identified Heritage Assets and the impact of the Project. The topography between The Hall and Parkland across a valley to the DOL means that the 50m tall pylons will be clearly be visible from within the grounds of Ingatestone Hall and from the Hall itself, and will irrevocably change the rural and relatively isolated setting of the grade I listed building, which has remained unchanged for centuries. The mitigation provided is insufficient in proportion to the level harm incurred by the proposed route. The PEIR thus fails to take into adequate account the negative effect of the pylons, and the impact they will have on the immediate landscape causing significant harm to the estate and Ingatestone Hall.



View looking east from the grounds of Ingatestone Hall towards St Mary's Church. The proposed pylons will dominate the horizon seen in this photograph, substantially changing the historic view and setting of Ingatestone Hall.

ST MARY'S CHURCH, BUTTSBURY (1264434)



Location: 80m from DOL

NG ASSESSMENT OF SIGNIFICANCE AND CONTRIBUTION OF SETTING

"The Grade II listed 'Church of St Mary' (1264434) is located on the western flank of Ingatestone Road c. 2.4 km west of Stock, 80 m south of the draft Order Limits. The asset is of high value based on its evidential and historical value. The church's core dates to the 14th to 15th centuries, but there later 18th century alterations and the asset was restored in 1876. Further restoration works took place in 1923, 1949 following WWII damage, and 1977. The nave and aisles are largely medieval and constructed of flint rubble with stone dressing. The chancel is rendered but likely of similar age and construction but has a later red brick plinth. The red brick tower and south porch were built in the late 18th or early 19th centuries, and both are partially weatherboarded. The church may have served the village of Buttsbury, which is recorded in the Domesday Book but now lost.*

The setting of the asset is informed by its isolated roadside location within its small churchyard and by its all-round views of the agricultural landscape with which it has a historical relationship. The loss of the settlement it once served detracts from the setting, but it still makes a moderate contribution to its value. Due to the proximity of the Project, the setting extends to the draft Order Limits".

ID Number	Name	Grade	Value	Operational Effects	Mitigation	Significance of Effect
1264434	Church of St Mary	II*	High	The Project would introduce tall infrastructure within the setting of the asset, causing a moderate change to the rural aspect of the asset's setting, which makes a moderate contribution to its value	There is no suitable mitigation to reduce this effect	Significant negative effect

Pevsner

ST MARY. Small and alone. Short nave of two bays with two aisles that is wider than it is long. Date C14. Chancel of the C18 with C.19 E window. Small W tower of timber, weatherboarded. The nave arcades are typical late perp, compositite, with the centre parts of the nave carried on into the archeswithout

capitals and the side parts concave sided semi-octagonal. Two original traceried windows were found during a restoration of 1923.

Significance

List description, Church of St Mary, grade II*

C14-15, with later C18 and 1876 restorations.

MATERIALS: The W tower is brick, the aisles are largely flint rubble with stone dressings, the chancel is rendered but may also be flint rubble, and the S porch and top of the tower are weatherboarded. Brick plinths and buttresses. Red tiled roofs

PLAN: A very small church. Chancel and very short 2-bay nave with N and S aisles, wider than they are long. W tower and S porch

EXTERIOR A very small church, with the nave and aisles wider than they are long. The church is unusual for preserving so much late C18 or early C19 churchwardens' Gothic work unrestored. The chancel is probably C14 in origin. It is rendered and has a small, brick plinth. The E window is 1876 in a Perpendicular style, but the N and S sides preserve late C18 or early C19 windows with segmental heads, high transoms, and square leaded panes.

The N and S aisles have large C14 Decorated E windows, and the N and S doors are early C14 with two chamfered orders, that on the N with a hood mould, but it possible that these were all reset in the C15 as the arcades inside are of that date.

Both aisles were remodelled and partly rebuilt in the late C18 or early C19, probably at the same time that the tower was built. The N and S windows are late C18 or early C19, and are similar to those in the chancel. The west walls of the aisles were wholly rebuilt in brick, and appear to be a single build with the tower. There are tall brick buttresses at the NW and SW corners of the nave, and there are also brick buttresses at the NE and SE corners of the aisles. The weatherboarded S porch may be another addition of this date.

Like the W walls of the nave and aisles, the W tower is late C18 or early C19 red brick. The tower has a large, 3-light W window with simple Y-tracery. The upper part of the tower has a series of offsets defined by string courses, and the belfry stage is weatherboarded with a pyramidal roof and ball finial. A small, brick chamber in the SW corner between tower and S aisle is a later addition.

INTERIOR: The interior is plastered and painted. The 2-bay N and S nave arcades are C15 and have chamfered inner orders on polygonal shafts with moulded capitals and continuous outer orders. The late C18 or early C19 tower arch is plain and has a segmental head. There is no chancel arch. The king-post roof in the chancel is late C15. The nave roof is of similar design, and probably similar date, but the

whole is set higher than that in the chancel. It was formerly ceiled, and a fragment of a Doom painting was found behind the ceiling when this was removed in 1977. The aisles have lean-to roofs, also formerly ceiled. That on the S is probably largely medieval, that on the N is C20

PRINCIPAL FIXTURES Very plain, damaged piscina with a pointed head and chamfered opening in the chancel. The chancel has some encaustic tiles and incorporates two C17 floor slabs. The N and S nave doors are both old. The N door has wide battens and ornamental hinges and straps dated by Pevsner to the C11 with additions of the C12. It also has a small, iron grill. The S door has four wide battens with an iron grill.

Very fine and well preserved fragment of a late medieval Doom painting found behind the nave ceiling in 1977, and subsequently conserved. The colours are very fresh. The top of Christ's head and halo are visible, as are the heads of angels carrying the nail and the spear from the Instruments of the Passion.

An unusual wooden war memorial for WWI, with a carved ogee top and an inscription recording that it was 'executed and erected by a parishioner' in 1920.

HISTORY Buttsbury the place is in the Domesday book of 1086, but the church is not mentioned, although it was not uncommon for churches to be omitted. The approximately 1 ½ square plan of the nave without the aisles may suggest an Anglo-Saxon origin for the church. The apparently C11 and C12 ornamental metalwork on the N door is also evidence of a church of this date on the site. The church may have Anglo-Saxon origins, with the core of the nave and the metalwork on the door of that date. The chancel and aisles may be C14 in origin, but the whole was remodelled in the C15 when the present arcades were built and the nave and chancel reroofed. The church was held by the nuns of St Leonard's Barking, and was sufficiently important, despite its small size, to have a very large parish with at least one dependent chapel at Stock (All Saints). The church is isolated, and there is no longer a village at Buttsbury. The W end of the church, including the tower and the W ends of the aisles were rebuilt in brick in the late C18 or early C19, perhaps after 1783 when the parish was united with Ingatestone. There was some restoration in 1876 when the E window was installed. The church was in poor condition by the early C20 and there was restoration in 1923 when the aisle E windows were discovered under blocking and restored. There was yet more restoration in 1949 following damage in WWII and again in 1977 when the nave roof was uncovered.

The parish was united with Ingatestone in 1783, which may provide a date for the Georgian rebuilding. In 2004 it became a unified benefice with Margaretting and Mountnessing.
SOURCES Bettley, J and Pevsner, N., Buildings of England: Essex (2007), 190-1 Brown, K. The Mysteries of Buttsbury (2002) RCHME: Essex IV (1923),

REASONS FOR DESIGNATION: The church of St Mary, Buttsbury, Stock, Essex is designated at Grade II* for the following principal reasons:

* Good surviving medieval fabric, including C15 nave arcades and C14 doors and windows.

* Unusual plan of considerable width.

* The nave and chancel roofs are excellent survivals of the C15.

* Unusual survival of C18 or early C19 churchwardens Gothic work including W tower and nave and chancel windows, creating a highly picturesque, multi-phased effect. Important early metal work, probably of the C11 or C12 on the N door

This List entry has been amended to add sources for War Memorials Online and the War Memorials Register. These sources were not used in the compilation of this List entry but are added here as a guide for further reading, 25 October 2017



Chapman and Andre 1777

Fuller Long HEA Assessment Of Significance

- 9.1.82. The church has considerable age value and the structure, scale, location and materials used feeds into an understanding of worship and buildings in the Middle Ages. A church possibly existed here in Saxon times. The Domesday Survey (c.1086) recorded Buttsbury – although the church was not recorded, it was likely present in the settlement. The church was later reconstructed in several stages (the most recent overhaul being in the 15th century). Much of the ancient timber survives, and the various building phases have been recorded adequately elsewhere. The church stands isolated today, as the settlement of Buttsbury no longer exists, but the parish was large and so the building was maintained. The church therefore has high evidential value.

- 9.1.83. The associative value relates to the families of the parish who are commemorated here, including two memorial slabs dating to the 17th century. The historic value of the church is considered to be high.
- 9.1.84. The 18th century church tower is constructed from red brick, with a timber bell tower, which complements the flint aisle and rendered chancel. The north door likely dates to the 11th century and showcases ornate metal work of this period. The aesthetic value of the church is considered to be high. The church continues to serve the local community and thus, the communal value is also high.
- 9.1.85. The church is at the highest point in the parish and has commanding views over the countryside to the west. Approaching the church from the west accentuates the church's isolated position and gives a strong impression of the former settlement that existed here. Its immediate setting is formed by the churchyard, but the wider landscape of the surrounding Essex countryside makes a strong contribution to the setting of the church, providing a peaceful backdrop to the historic building.

Fuller Long Critique Of NGET Assessment

- 9.1.86. The 2022 non-statutory consultation documents originally showed the preferred pylon route bisecting the countryside between Ingatestone Hall and St Mary's Church, Buttsbury (roughly indicated by the purple line in the map above). Following concerns raised about the potential heritage impacts on Ingatestone Hall, the line was moved to its present position in the 2023 preferred draft alignment section (G). The decision to move the draft alignment away from Ingatestone Hall and closer to the grade II* listed church at Buttsbury was flawed, as the impact was simply transferred from one significant heritage asset to another. The Design Development Report (2023) stated that *'an alignment within the consultation corridor is less preferred over an alternative to the east, outside the consultation corridor, as although slightly longer and less direct the route further east would substantially reduce the effects on the Grade I Listed heritage assets at Ingatestone Hall and St Giles Church. This change to the preferred corridor is referred to as 'Further east of Ingatestone'.* This decision did not assess the heritage impact on St Mary's Church, and the conclusion stated that *'On balance the consultation corridor to the north east of Ingatestone in combination with the alternative further east passing to the east of Buttsbury Church and the wastewater treatment works are preferred'*.
- 9.1.87. The moderate level of contribution provided by the setting to the church in the HEBR is inadequate. The isolated nature of the church means that the setting formed by the surrounding countryside is more important, conveying a feeling of seclusion and remoteness. The church is a landmark, with a commanding position affording views in all directions.
- 9.1.88. The preliminary operational effect assessment table states that the Project will only cause a moderate change to the rural aspect of its setting, but will have a 'significant negative effect', thus emphasising the inadequacies of matrices to assess value and impact. The Pylons in reality will dominate the setting of the church causing substantial harm to the contribution that setting makes to the significance of the listed building.

- 9.1.89. St Marys Church was one of only two assets to have been assessed with wireline visualisations within the PEIR (Volume II: Figures, 23 of 27). The image of the church, taken very close to the south elevation, would suggest that the church will not be impacted to too great an extent, as the trees and built form of the church shield the project at such close range. The views immediately east from the church show how close the infrastructure will be to the grade II* listed asset. This image (below) highlights that the impact of the scheme will have a substantial impact to the setting of St Marys Church.



VIEW LOOKING EAST FROM ST MARYS CHURCH, ILLUSTRATING THE IMPACT OF THE TALL INFRASTRUCTURE (FIGURE NO: 13.9.80D. VIEWPOINT 7.01: BUTTSBURY)

WENHAM PARVA (LITTLE WENHAM)

- 9.1.90. The assessment of the highly significant buildings at Little Wenham serves to illustrate the inconsistencies and failings of the appraisal of heritage assets within the study area using a desk based assessment. A previous Heritage Statement was produced for the impact to this hamlet as part of the 2023 non-statutory consultation and will not be repeated again here.



Little Wenham. View looking north. AVR of the view from the roof of Little Wenham Castle (grade I) towards the 2023 preferred route. The view includes the (grade I) St Lawrence Church and grade II listed barns (centre) together with the grade II* listed barn (on left). All of the assets share the same setting and have a significant group value as well as historic, evidential aesthetic and communal values. The banks of woodland and intervening hedgerows identified in the HEBR as providing mitigation do nothing to moderate the impact of the tall infrastructure upon the setting of, and views from, these nationally important heritage assets. Apart from the church, all of the other 8 heritage assets within the hamlet have been scoped out from further assessment (including the grade I castle and grade II* barn)

- 9.1.91. The HEBR assesses little Wenham as follows. Corrections (in bold type) are made by the author:

Wenham Parva CP

The following assets (1003759, 1033405, 1033410) form part of a group of medieval assets located within the grounds associated with Wenham Castle (1003759) and are assessed below:

The high value scheduled monument 'Wenham Castle (Little Wenham Hall)' (1003759) which is also Grade I listed (1033405), located c. 1.5 km south of the draft Order Limits, was built in the latter half of the 13th century, believed to be 1260-1290, and comprises a hall and chapel. During the middle of the

16th century some minor alternations were made to the building. The asset is a fortified manor house in an Lshaped plan, containing a Tudor-roofed banqueting hall over the Chapel of St Petronilla with piscina (shallow basin used for washing communion vessels) and aumbrey (recessed cabinet in church wall for containing sacred vessels and vestments). Built in early Flemish brick and ashlar with an embattled parapet and with a turret termination to spiral stair leading to the roof. The asset is surrounded by a moat which encloses a large area than just the castle, taking in other buildings many of which are listed also. The asset is of great importance as it represents an example of one of the earliest uses of home-made bricks in England, also in the fact it was built with the purpose of being a house and not a keep.

The asset is located on the periphery, c. 1 km north-east, of the settlement of Little Wenham,

The asset is located in the centre of the hamlet of Little Wenham. The error seems to have come about as the name 'Little Wenham' appears on a map to the south of the hamlet, which the assessor has relied on.

within a property containing multiple other barn-style buildings,

Three of which are grade II listed, (1285599, 1351958, 1194648), and one of which is grade II* listed (1194552). These are assessed in the second Wenham Parva section some 40 pages later, but not identifying them within this initial section provides an incomplete and inaccurate description of Little Wenham.

in part still surrounded by the original moat which is associated with the asset. The asset is lined by a band of mature vegetation to the west and south, positioned on the external side of the moat. The asset is surrounded in the wider landscape by agricultural land, with some settlements close by, the closest being Capel St Mary c. 430 m to the southeast. The settlement of Great Wenham is situated c 1.1 km south-west of the asset. the asset is located on the eastern side of a tributary valley which Stutton Brook runs south to the A12 where it then flows south-east towards the River Stour Estuary. This position next to the tributary was likely a key consideration in the construction of the asset, placing it next to a point of resource in the landscape and likely providing a means without to create the water filled moat which once surrounded the entire property containing the asset. The setting of the asset makes a considerable contribution to the value of the asset, despite the settlement growth of Capel St Mary to the south-east, which is screening by a thick band of woodland. Moreover, the removal of the railway way line of LNER Hadleigh Branch which ran to the north-east of the asset, this once proximal transport feature has been removed, however a band of vegetation following the old railway line still transects the landscape. Overall, the setting of this asset does not extend to the draft Order Limits.

The Grade I listed asset 'Church of St Lawrence, Formerly Church Of All Saints' (1033410), located c. 1.2 km south-east of the draft Order Limits pipeline and 1.4 km south of the draft Order Limits, is a 13th century parish church with 14th, 15th and 16th century additions. The 15th century west tower is built

from mainly rubble and flint with some flint flushwork, with 16th century red brick bell chamber to the tower with ashlar and stone dressings. The south porch is timber framed, with a brick dwarf wall. Red plain tile roofing covers the nave and chancel. There is 17th and 18th century panelling within the church.

The asset is located within the grounds of a moated site with multiple other listed buildings and a schedule monument. The asset is on the northern edge of the collective group of buildings (**all of which are listed**) within the moated site. The asset is located off the The Row, a road that leads into the settlement of Little Wenham. **The Row is actually called Gypsy Row, an historic route which was once the main tree lined avenue to the hamlet, and is now a track rather than a road.** To the south-west, south and south-east of the asset is a band of mature trees providing some screening into the landscape. To the north there are open views over farmland towards the LNER Hadleigh Branch railway that used to run across the landscape north-west to southeast. The setting of the asset contributes considerably to its value. The asset has aesthetic, evidential, historical and communal value and is high value. The setting of the asset does extend to the draft Order Limits situated just beyond the route of the former LNER Hadleigh Branch Railway.

The setting of Wenham Castle is derived from the rural nature of the countryside to the north, and is identical to the setting of the Church of St Lawrence. Both have the same setting, being located in the same location on raised ground overlooking the fields and DOL to the north. The fact that the setting of the castle is believed not to extend to the DOL, and yet the setting of the church does extend to the DOL clearly establishes that an inadequate assessment was undertaken for Wenham Parva. The grade II* listed barn to the northern edge of the settlement shares the same setting as the castle and the church. The barn is actually the closest listed building within the group to the DOL. This asset is of high significance as demonstrated by its grade II* listing, but it is not described until the second Wenham Parva section some 40 pages later, where the setting is assessed as not extending to the DOL.

The Church of St Lawrence is taken further for assessment of the preliminary operational effects of the Project on the setting of the asset. Table A11.2.40 states that the project will result in no change within the setting of the asset, despite a wirescape visualisation in part 16 of 27, Volume II: Figures, demonstrating that the pylons will be clearly visible within the setting of Little Wenham.



Figure 3. Wirescape visualisation of view looking north from the footpath between the grade I listed Church of St Larence and the grade II* listed barn towards the pylons and wirescape which introduce an alien element to a historical setting.

9.1.92. Other assets described as being part of Wenham Parva are included in the description as follows:

- The 'Church of St John' (1033403), designated Grade II*,
This asset is in Wenham Magma (Great Wenham) not Wenham Parva (Little Wenham)
- Threeways' (1033404), a Grade II listed house
This house is situated just north of Wenham Magma (Great Wenham)
- North of Little Wenham, c. 500 m, is found the Grade II 'Manor Farmhouse' (1194545)
This house is west of Little Wenham and forms part of the settlement of Coopers Corner
- Found c. 2 km north of Little Wenham, the Grade II listed 'Vauxhall' (1351957) is a listed building located c. 240 m west of the draft Order Limits
This house is a remote farmhouse, not connected to Little Wenham.

Despite the Heritage Baseline Report stating in Appendix C that the appropriate professional standards and guidelines were used, including the 'five-step' approach within part 2 of the good practice advice (GPA3) note (Historic England, 2017), this has clearly not been the case. This has resulted in every building within the hamlet of Little Wenham (described by Pevsner as having 'great historical importance') being scoped out of further assessment within the PEIR save for the Church of St Lawrence, which shares the same setting as all 9 designated assets (and one non-designated asset which has not been identified at all).

VAUXHALL, WENHAM MAGNA

- 9.1.93. The assessment of the historic farmhouse at Vauxhall serves to illustrate the inconsistencies and failings of the appraisal of heritage assets within the study area using a desk based assessment. The significance and setting of this asset will not be assessed further here, but the inaccuracies within the PEIR will be addressed below.



Aerial image of Vauxhall, a 15th/16th century timber framed house set within a moat

PEIR description:

Found c. 2 km north of Little Wenham, the Grade II listed 'Vauxhall' (1351957) is a listed building located c. 240 m west of the draft Order Limits. Dating back to c. 1500, this timber-framed house features a red plain tiled roof and a prominent off-centre red brick chimney stack. Situated on a moated site, this property holds historical value, having been previously owned by the Vaux Family and later linked to Leigh Priory in Essex. Overall, this house has medium value based on their evidential, historical and aesthetic value. Nestled in a quiet and rural setting, the property is surrounded by expansive agricultural fields that contribute to the serene ambiance. The undulating landscape features large, open crop fields, creating a picturesque environment. To the south, there is a farmyard, and beyond stretch several woodlands, enhancing the overall tranquillity of the location. Overall, the setting of this asset makes a very considerable contribution to the asset's value and extends to the draft Order Limits.

This asset, being just 240m from the DOL, has been carried forward for further assessment within the PEIR and features within Appendix 11.2 – Historic Environment Assessment Tables. This assessment

outlines the preliminary effects of the Project on Designated Heritage Assets during operation (and maintenance). For Vauxhall, the assessment is as follows:

ID Number	Name	Grade	Value	Operational Effects	Mitigation	Significance of Effect
1351957	Vauxhall	II	Medium	This section of the Project is undergrounded causing no change to the rural aspect of the asset's setting, which makes a moderate contribution to its value	Reinstatement of damaged/ removed historic field boundaries and earthworks	Neutral

The assessment of the impact of the operational effects of the Project on this asset is based upon incorrect data. The line will not be undergrounded at this point. A CSE compound to reintroduce the overhead line following the undergrounding at Dedham Vale is proposed to the west of Vauxhall. The pylons and tall infrastructure will therefore pass within 240m of this listed building, which will have a significant negative impact to its setting and significance.

Thank you for viewing our Objection Statement.

If you have any queries or would like to discuss anything further with us please don't hesitate to get in contact hello@fullerlong.com

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