



**PLANNING ACT 2008 (AS AMENDED) – SECTION 88 AND THE
INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010 (AS
AMENDED) – RULE 8**

**APPLICATION BY NATIONAL GRID ELECTRICITY TRANSMISSION FOR AN
ORDER GRANTING DEVELOPMENT CONSENT FOR THE SEA LINK PROJECT**

APPLICATION REF: EN020027

SUBMISSION DEADLINE: 26th February 2026

**WRITTEN REPRESENTATION OF THE HISTORIC BUILDINGS AND MONUMENTS
COMMISSION FOR ENGLAND (known as HISTORIC ENGLAND)**

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Summary

Historic England does not object in principle to the Proposed Development. We have however raised some concerns with the application that we feel would benefit from further scrutiny. These are set out below.

We have concluded that a large range of designated and non-designated heritage assets would be negatively impacted by the development and that some direct, permanent and harmful changes would result from it. These changes would result in a significant effect in some cases. These impacts will need to be weighed in the balance in relation to the decision making.

We have in particular provided a supporting narrative in relation to a number of assets following our own assessment of the proposal. We have noted some areas where we feel there are anomalies in the applicant's assessment, for example the approach taken in relation to the Grade I Church of St Remigius at Roydon (see text above) and non-designated heritage asset known as Bush Hall.

In relation to the Dedham Vale National Landscape, we note the approach to underground a major section of cables through this area will reduce effects on the National Landscape and its setting. We have however also identified that this approach is also likely to increase impacts on non designated heritage assets in the location. Further work is needed here in order to understand the complex of archaeology that exists on both sides of the river and the potential of the palaeoenvironmental deposits within the stour itself.

One of our major concerns however is the shortfall in the amount of field evaluation that has taken place. This is less than would have been anticipated for a project of this magnitude and scale. The applicant has acknowledged that the evaluation and assessment, particularly of non-designated heritage assets and archaeological sites is incomplete and Historic England understand the applicants position; however, as we have noted below many reports provided for the are effectively interim at this time and the application only partially address the policies as set out in EN-1 in relation to the applicant's assessment.

The ExA would need to be reassured that this work can be undertaken appropriately, to the required standards going forward and in sufficient time as not to delay the construction.

We have also recommended that the assessments and proposed mitigation documents are amended as appropriate to reflect new information or updated assessment of significance. This will need to be provided as an addendum or through tracked changes.

We have also made some recommendations particularly in relation to things like the wording of the DCO, the CoCP, WSI and OAMS that we feel would help provide rigour in the event that the DCO is granted. We recommend these changes are implemented before the end of the examination.

1 Introduction

- 1.1 The Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England, is the Government's statutory adviser on the historic environment. It is our duty under the National Heritage Act 1983 to secure the preservation and enhancement of the historic environment in England including historic buildings and areas, archaeology and historic landscape with a duty to promote public understanding and enjoyment. This extends to sites and places in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England.
- 1.2 Historic England is an executive Non-Departmental Public body sponsored by the Department for Culture, Media and Sport (DCMS) and we answer to Parliament through the Secretary of State DCMS. Our objective here is to ensure that the historic environment generally, and marine and designated heritage assets especially, are fully considered in the determination of this DCO.
- 1.3 The National Heritage Act (2002) gave Historic England additional responsibility for identifying sites for designation within the English area of the UK Territorial Sea (i.e. English Inshore Marine Planning Area). We also provide our advice in reference to how the historic environment is included within marine planning and licensing provisions within the Marine and Coastal Access Act 2009.
- 1.4 We have already provided substantive pre-application advice to the applicant in relation to the scope of environmental assessment and the Preliminary Environmental Information Report. The applicant has provided an Environmental Statement with supporting appendices and other documentation with the application, we have considered this information, and thereby provide additional and detailed comments,
- 1.5 This Written Representation sets out the views of Historic England on the proposed Development Consent Order (DCO) application made by National Grid Electricity Transmission for the proposed Norwich to Tilbury project.
- 1.6 The project will require the building of approximately 180–184 km of new 400kV electricity infrastructure, primarily consisting of about 159 km of overhead lines supported by steel lattice pylons. Around 25 km of the route will be underground, particularly through the Dedham Vale National Landscape, requiring new Cable Sealing End compounds. New substations would include the East Anglia Connection Node near Ardleigh, in Essex and another at Tilbury, in Thurrock, alongside extensions to existing substations at Norwich Main (Mangreen) and Bramford in Suffolk.
- 1.7 The submitted application includes an ES, dated March 2025, produced to satisfy the requirements of Environmental Impact Assessment (EIA) requirements, under the terms of European Union Directive 2011/92/EU (as amended by Directive 2014/52/EU)) on the assessment of the effects of certain public and private

projects on the environment (EIA Directive). The EIA Directive is transposed into English law for Nationally Significant Infrastructure Projects (NSIPs) by The Infrastructure Planning (EIA) Regulations 2017.

- 1.8 We have considered the application in relation to the EIA directive, and using policy including the National Policy Statement for electricity networks infrastructure (EN-5), 2025 and Overarching National Policy Statement for energy (EN-1), 2025
- 1.9 We have noted that this development has the potential to impact the historic environment, and that this impact could be significant in relation to many heritage receptors and in relation to EIA policy.
- 1.10 We confirm the ES is broadly adequate for the purposes of the examination. The baseline and assessment are set out in the accompanying ES chapters. It was agreed during the scoping process that detailed assessment of the impact of the proposal upon the historic environment would be required, and this is provided here.
- 1.11 The Environmental Statement (ES) Chapter 6 (Cultural Heritage) summarises the assessment of the significance of the designated heritage assets and their setting as well as the impact on their significance. We would broadly accept the findings but wish to comment in detail on the assets we identified at the PIER stage plus some additional ones within our remit on which the applicant has commented in the ES.

2 Designated Heritage Assets: Listed Buildings, Registered Parks and Scheduled Monuments

General Comments

- 2.1 The historic environment assessment is found primarily in
- Document 6.11.A1 - ES Appendix 11.1 – Historic Environment Baseline Report
 - Document: 6.11.A7 - ES Appendix 11.7 - Assessment of Harm to Designated Heritage Assets.
- 2.2 The Baseline Report outlines the archaeological potential of the proposed scheme area, a demonstrates that archaeological remains have been previously recognised that span from the Palaeolithic to the modern day. Some very valuable sites have been investigated in the past, and these include Palaeolithic era Lake deposits that provide an opportunity to recover high resolution palaeoenvironmental information, and the well-known multiperiod site at Mucking
- 2.3 Chapter 1.5.3 (Historic Environment Baseline Report) summarises the sources used to support the development of the baseline report. It is noted that BGS borehole data has not been utilised, which seems like a missed opportunity. The BGS borehole data would provide valuable information to characterise the sequence of deposits present, help to understand the archaeological potential as well as the potential impacts of the proposed scheme. We recommend BGS data is incorporated into the assessment and deposit models if the scheme is given consent.
- 2.4 The proposed development follows a route which would bring it into the setting of a number of listed buildings, registered parks and gardens, conservation areas and scheduled monuments. This could result in visual impact from the development. We have considered the operational impact on the setting of grade I and II* listed buildings, registered historic landscapes, conservation areas and scheduled monuments. We would defer to the relevant local planning authorities to comment on grade II listed buildings and undesignated heritage assets.
- 2.5 In our earlier advice on the PEIR (letter dated 12th July 2024) we commented on a number of designated heritage assets within the remit of Historic England which, following initial inspection of the route, we considered most likely to be affected to a degree which might harm their significance. At that stage the applicant had already produced a number of images with the proposed pylons and lines added which helped us in this assessment. More have since been added, both specifically to illustrate the effect on heritage assets and as part of the wider Landscape and Visual Impact Assessment.
- 2.6 The following advice is presented in order the sites are encountered along the line of the Order Limits, from north to south. We have only provided text on a selection

of assets where we feel comment would add value to the examination or where we have specific issues of concern or recommendations.

Roman Town of Venta Icenorum: Roman town and associated prehistoric, Anglo-Saxon, and Medieval remains' (1021463)

- 2.7 We note the applicant has considered the impact of the development on a group of high value assets associated with and centred around the Roman town of Venta Icenorum. The applicant has identified that the Project would result in a change to the setting of the asset but concluded that due to the distance and the partial screening, this would be at the lower end of less than substantial harm. Given this is a well-known and publicly accessible site with interpretation historic England have considered this site and the associated high value assets. We likewise concluded there would be some harm to the significance of the assets, and we would agree with the applicant's conclusion. Please note that some of the scheduled monument descriptions here have been updated in response to this application.

Flordon Hall (NHLE 1050698, listed grade II*)

- 2.8 Document 6.11.A1 ES Appendix 11.1 – Historic Environment Baseline Report (paragraphs 3.2.547-548) includes the applicant's assessment of the significance and setting of Flordon Hall and its associated buildings and notes that the setting is 'informed by the surrounding agricultural landscape with which the assets have a functional and historical relationship.' It also notes the 'mature, tree lined grounds with lawned areas and kitchen garden'. It is this setting which the report seems to be describing when speaking of how the 'setting of the assets instils a sense of seclusion and privacy and promotes an understanding' but it is clear that the landscape setting beyond this is larger and, as the report concludes 'extends to the Order Limits'. We would also suggest that a house of this period, scale and status might have had formal grounds of larger extent on its eastern frontage looking over the shallow valley.
- 2.9 Viewpoint images 1.04 (Figure 7.12.F4-VP1.04) and HE1 (Figure 7.12.F206-HE1) look from the east towards the house and show its quite formal aspect. They also confirm that the line of pylons would be visible behind the house, quite prominent and unavoidable in these important views. We consider this would visually detract from the listed Hall and result in harm to its significance. The applicants' assessment (ES Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 205) concludes that the proposed development would harm the significance of the listed building at a mid-level of less than substantial harm. We would agree with this conclusion.

Tacolneston conservation area including All Saints' Parish Church (NHLE 1178820, listed grade I), Old Hall (NHLE 1373381, listed grade II*) and Manor Farmhouse (NHLE 1050043, listed grade II*).

- 2.10 We would accept the applicant's assessment of the significance and setting of these heritage assets (in Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report) as relate to the Old Hall (paragraph 3.2.717-718), Manor Farmhouse (paragraph 3.2.719-720) and All Saints parish church (paragraphs 3.2.346-347). Paragraphs 3.2.27-28 relate to the conservation area and note that its setting is 'informed by the interrelationships between the built environment and its relationship with the rural landscape. We would agree with this but feel the landscape setting might be given more emphasis in their assessment of the potential impact of the proposed development.
- 2.11 In the southern part of the conservation area its eastern side including the grounds of Manor Farmhouse are open to fields and potentially would have views of the proposed pylons, although they would be at some distance from the Project and these assets are not likely to be adversely affected. At its closest, the eastern side of the northern end of the conservation area is some 796 m from pylon RG033 which would be visible from the edge of the area and possibly the rear grounds of the Old Hall.
- 2.12 The ES (Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 216) considers the conservation area, describing it as focussing on the Norwich Road which runs through the village. It may be for this reason it concludes that 'the Project would only be occasionally visible.' But as noted above the edge of the conservation area would be more affected. The applicants' assessment (ES Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 203) concludes that the proposed development would harm the significance of the listed All Saints' parish church at a lower level of less than substantial harm. Image HE22 (Figure 7.12.F230-HE22) looks from the churchyard) and suggests the pylons would be largely hidden by vegetation and buildings but might be glimpsed at some points so we would agree with the assessment.

All Saints' Parish Church, Tibenham (NHLE 049992, listed grade I).

- 2.13 Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report paragraphs 3.2.369-370 outlines the significance of the listed building and comments on its setting. It describes how the 'setting of the church...makes a considerable contribution to its value, and due to the open view across farmland to the north-west, the setting extends to the Order Limits.' We would agree with this and note that there is no clear view out from churchyard and a modern building limits views towards the Project where pylon RG051 is some 978 m away. However, the church can be seen, particularly from the north side from the road, in a way which would include the pylons in its rural setting.
- 2.14 The applicants' assessment (ES Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to

Designated Heritage Assets page 203) concludes that the proposed development would harm the significance of the listed building at a lower level of less than substantial harm. We would agree with this conclusion.

Winfarthing conservation area and St Mary's Parish Church (NHLE 1180035, listed grade I).

- 2.15 The significance and setting of the parish church and conservation area have been considered by the applicant in Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report. Paragraph 3.2.31 relates to the significance and setting the conservation area while paragraphs 3.2.377-378 consider the parish church. We accept the assessment and the reference to the setting of the parish church as being 'informed by the agricultural landscape to the...east with which the asset has a historical relationship.' It also notes that 'there is an open view to the east [of the churchyard] towards the Order Limits. The setting of the church makes a considerable contribution to its value and due to the proximity of the Project, the setting extends to the Order Limits. '
- 2.16 The applicants' assessment (ES Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets page 204) concludes that the proposed development would harm the significance of the parish church at a lower level of less than substantial harm. Viewpoint image HE23 (Figure 7.12.F231-HE23) is taken from near the eastern edge of the churchyard extension and shows the pylons partly screened by trees, even in winter, but one is visible and intruding into an otherwise agricultural landscape. The effect detracts from this setting, and we would concur with the applicants' assessment of harm.

St Regimus' Parish Church, Roydon (NHLE 1050237, listed grade I).

- 2.17 Describing the church's setting the applicant (Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report 3.2.403-404) states that the church 'for much of its history, was set within a rural landscape with Roydon Hall (NHLE 1373311, listed grade II) to the north-west, dispersed farmsteads and a complex of moated sites and a manor house to the east-north-east [but] the outskirts of the [modern] town now encroaches on the church to the north and east. The setting of the asset, therefore, makes a moderate contribution to its value, but due to open views to the south and south-west from the asset, the setting extends to the Order Limits. '
- 2.18 This does not comment on the significance of the landscape to the south of the church and that it can be seen from here on a ridge above the largely undeveloped valley of the River Waveney. This part of its setting illustrates its relationship with an agricultural landscape but also its landmark role and is an aspect of its significance. The EIA Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 204 does comment on the church's

'location on the northern edge of the Waveney Valley' but concentrates on the setting within the churchyard and the partial screening of trees on its boundary.

- 2.19 It also does not give any weight to the church in its landscape or that the valley side location is particularly important, rather than the northern side (the modern Roydon village). The comment that 'the Project would only be occasionally visible from the asset' does also not address views towards the building.
- 2.20 While it is true that views from the churchyard to the valley are partial due to vegetation Figure 7.12.F208-HE2ii (viewpoint image HE2ii) is situated close to the church and shows the scale of the proposed pylons from the rising ground on which the church sits and the way they would be an almost unavoidable visual presence in views of the valley from this area. Viewpoint image VP 1.15 (Figure 7.12.F15-VP1.15) is situated to the west of the church on the top of the land above the river valley and shows the proposed pylons in visual relationship to the church tower. They compete with the tower in scale and detract from its prominence in the landscape as well as affect the rural character of the valley landscape
- 2.21 Looking northwards across the river valley are series of viewpoint images give an impression of how the proposed development would affect the wider setting of the church. Figure 7.12.F207-HE2i (viewpoint image HE2i) shows the church on the rising ground above the valley. In this image the pylons are high above the viewer, giving a good impression of how they would dominate the experience of the valley floor and detract from the experience of the landmark value of the church. Viewpoints VP2.01 (figure 7.12.F207_VP2.01) and VP1.22 (figure 7.12.F22_VP1.22) also look from the bottom of the valley towards the church with the former showing a view across the heath towards the opposite side of the valley. VP1.21 F22 looks from the north side, east of the church, but together they all give an impression of how this landscape would be dominated by the proposed development. Document: 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets (page 204) concludes that 'the Project would result in a small change to the setting of the asset' but the images produced by the applicant contradict that.
- 2.22 We therefore do not agree with the applicant's assessment that the development would cause 'Lower Less Than Substantial Harm'. The proposed pylons would dominate the most important part of the church's setting, and we consider this would cause a high level of less than substantial harm, and we consider this is a significant effect in EIA terms.
- 2.23 We have previously advised the applicant that placing the cables underground through the valley would reduce the harm to the church. This had been included in the discussion at an earlier stage, but the scheme as proposed has reverted to overhead lines in this area. We have also recommended alternative overground routes we explored, but these again have been discounted. This will therefore be an area where there is clear residual harm to the significance of the asset for the lifetime of the scheme.

Bush Hall (1013 non-designated)

- 2.24 During our assessment of the route and pre-application discussion with the applicant discussion we identified the site of Bush Hall (see Historic Environment Baseline Report, paragraphs 3.2.413 and 3.2.414). This is a moated enclosure known to be the site of a former medieval house or manor known as Bush Hall (applicants ref 1013). We identified the site as a well-preserved moated site in an unusual location within the Waveney valley. It is not currently inhabited with a later period house and has good surviving form as an earthwork and is relatively undisturbed. Recorded excavations confirms a medieval date and there is clear potential for wet preservation and there are records of organic finds from the riverine location. The asset is sat within a meadow on the edge of the river valley and close to Roydon Church, within the quiet rural location. This situation make a very decent contribution to its setting, and the setting contributes strongly to its significance, and it is in a location currently unencumbered by modern infrastructure.
- 2.25 Moats are a common feature of the medieval landscape of East Anglia, and a number of the better preserved or unusual examples are designated. We appreciate this not a designated heritage asset at the moment, however it has a clear evidential and historic value which means that there are factors here which would favour designation. This include a well-presented layout, good well-preserved earthworks and likely survival of medieval archaeological deposits. The diversity of features and its wetland location contribute to its overall significance.
- 2.26 In our view this asset should be considered as having a high value in the assessment with its setting also making a higher contribution that considered in the baseline assessment. The overall magnitude of effect would we believe also be higher, although we are aware this has already been noted by the applicant as a significant effect. We also consider that this asset would need to be considered under the policy EN 1 para 5.9.8.
- 2.27 The impact from the development upon this site is likely to be very severe, primarily from the closeness of pylons RG85-87 which are located immediately adjacent to the asset. This is a concern and we would welcome further conversation with the applicant as to whether there is any further mitigation possible for this site to reduce the high overall effect of the new pylons.

St Mary's Parish Church, Burgate (NHLE 1032797, listed grade II*).

- 2.28 The applicant has considered the significance and setting of the church in Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.3.311-312. This states that ‘the surrounding agricultural landscape, with which the asset has a historical relationship...informs the setting [which] makes a considerable contribution to its value, and due to the proximity of the Project, the setting extends to the Order Limits.’ While there is some planting on the boundary there are clear views from the churchyard towards the Order Limits with the proposed pylon RG104 some

788 m away. The ES (volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 245) comments on the screened views from the churchyard and concludes that the proposed development would harm the significance of the parish church at a lower level of less than substantial harm.

- 2.29 We do not disagree with this level of harm but consider the issue of views towards the church tower as a landmark seen above a shallow valley has not been fully considered in the applicants' assessment. There are existing electricity pylons in this wider setting, but the proposed development is likely to increase that impact and with it the level of residual harm. An image taken from west of the church (Figure 7.12.F25_VP2.04) gives an indication of the how the development would appear in the landscape to the south of it. This could affect the experience of seeing the church in this wider landscape and potentially harm its significance. This might still be harm within the category of lower less than substantial harm but would add to it.

Mellis Conservation Area, including the Parish Church of St Mary the Virgin (NHLE 181735, listed grade II*).

- 2.30 The applicant has considered the significance and setting of the church and conservation area in document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report. Paragraph 3.3.27 states that 'the setting of the conservation area ... makes a considerable contribution to its value, but due to the proximity of the Project within the agricultural landscape c. 120 m to the north-west, the setting extends to the Order Limits.' The Baseline Report also comments on St Mary's parish church (paragraphs 3.3.319-320) confirming that '...the setting...is also informed by the surrounding agricultural landscape with which it as a historical relationship. The mature graveyard of the church instils a sense of privacy and peacefulness and so the setting of the asset makes a considerable contribution to its value. Due to proximity of the Project the setting of the asset extends to the Order Limits.'
- 2.31 We accept this assessment but feel the common at the heart of Mellis conservation area is of particular importance. This part of northwest Suffolk has a number of large commons surviving, but Mellis is one of the more dramatic. This is partly due to its linear layout, and because historic and later development is set along its edges, not dividing it as seen elsewhere. Views westwards along the common should therefore be given particular emphasis when assessing significance and impact upon it.
- 2.32 Two useful images have been submitted with the application to suggest the likely visual impact of the development on the common and western part of the conservation area. Figure 7.12.F242-HE33 (Viewpoint HE33) shows an image from the eastern end of Mellis conservation area. Rather than looking directly out from the end of the common it is situated to one side of the main axis of the historic common but does give an impression of the line of proposed pylons

flanking the conservation area to the north and west. The image from Viewpoint VP2.05 (Figure 7.12.F26_VP2.05) is in the western third of the common looking to where pylon RG102 would be some 635 m away. No images are provided or assessment made of the effect on approaching the common and conservation area, with the exception of viewpoint 2.49 (figure 2.17.F67_VP2.49). This gives an indication of the experience if approaching from Little Green to the north from where the development would appear to pass in front of and then curve around the western part of the common in a dramatic manner. From these three images we consider the development would detract from the setting of the conservation area, in particular the agricultural setting of the historic common and conservation area, but we do not feel they fully represent the full impact on the landscape setting.

- 2.33 The ES, Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets (page 246) considers impact on the conservation area and states that 'due to screening by vegetation the Project would be occasionally visible' and concludes that the proposed development would harm the significance of the listed building at a lower level of less than substantial harm. As noted above, we feel this is not based on a broad enough notion of how the developing might affect a substantial part of the conservation area and we conclude the level of harm might be closer to a mid-level of less than substantial harm.
- 2.34 Views from the churchyard of the parish church are restricted by vegetation and the building does not have a strong presence beyond its immediate setting. However, ES Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets page 218 states that the Project would be within the setting of the church. There are existing electricity pylons to the north of the church which would be replaced by the proposed development. The impact of these is not assessed by the applicant, but we would agree that their harmful intrusion into the largely rural setting of the church would not be increased by the proposed development.

Moat Yard Plantation Mellis (2253 3.3.372) non designated of equivalent value

- 2.35 This is another site similar to Bush Hall where the expression of the moat – in this case a possible double enclosure would merit a higher valuation. We note this feature is not shown on Fig A11.1.2 (pp 9 of 43) and would recommend the applicant revisit the assessment of affects on this asset in light of its evident significance.

St Mary's Parish Church (NHLE 1033123, listed grade I) and Ivy Farm House (NHLE 1180705, listed grade II*), Gislingham.

- 2.36 Regarding Ivy Cottage, document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.3.342-343 notes that the setting of the asset contributes to its significance '...but despite the proximity

of the Project, the setting does not extend to the Order Limits due to screening by intervening residential development and mature vegetation.’ We would accept this conclusion. The church is considered under paragraph 3.3.339 where it is concluded that ‘there is the possibility of broken views of pylons to the east and north-east from the church, and so the setting extends to the Order Limits.’ Considering impact in the ES, Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets page 218, it is concluded that the development would harm the significance of the listed church at a lower level of less than substantial harm and we concur with that. An image taken from east of the village (Figure 7.12.F25_VP2.04) gives an indication of the how the development would appear in the landscape, although this is closer to it than the church.

Finningham Conservation Area including Church Farm House (NHLE 1033145, grade II*).

- 2.37 Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report paragraphs 3.3.401-402 confirm that the setting of Church Farm House, situated at the edge of the conservation area, does not extend to order limits and figure 7.12.F243-HE34 (Viewpoint HE34) confirms that the development would not have a harmful effect on the significance of the heritage assets. We would accept this conclusion.

Roydon Hall (NHLE 1033215, listed grade II*) and Barn to the North West (NHLE 1284584, listed grade II*), near Creeting St Peter.

- 2.38 The applicant has considered the significance and setting of the listed buildings in document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.3.1176-1177. This notes the surrounding agricultural landscape ‘with which the assets and the non-designated outbuildings have historical and ongoing functional relationships. The setting of the assets, therefore, makes a considerable contribution to their values, and due to the proximity of the Project, the setting extends to the Order Limits.’
- 2.39 The line of proposed pylons would pass to the east of the complex, the closet of which (RG158) would be some 30 m away. The principal frontage of Roydon Hall faces west, so the pylons would be seen from the rear but at that distance they could have a profound impact on views to the fields which, which the Baseline study confirms are part of its setting and make a positive contribution to significance. The ES, Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets Hall pages 235-6, state that such views ‘would be broken by the asset's outbuildings, the mature trees of the asset's grounds, and mature hedgerows of the Intervening landscape.’
- 2.40 It is further stated that ‘no key views of the asset would be impacted by the Project’ although what constitute ‘key views’ is not set out. We would contend that

one key view might be of the farm complex as a whole in its agricultural setting, though this has also not been addressed in the applicant's assessment. A particularly illustrative view is from the east with the main approach to the farmstead and where the frontage of the Hall and the whole group can be seen. Given that the pylons are close to the eastern side of the group there is potential for them to be seen as rising above the buildings to dominate them and their farmland setting in this 'key view'.

- 2.41 No viewpoint image has been produced to aim an assessment of this effect. However, viewpoint image 2.14 (Figure 7.12.F35_VP2.14) is taken from some distance to the east of the Hall and does not have the listed building as its focus but does give some indication of the likely appearance of the proposed development and how it would change an otherwise agricultural landscape.
- 2.42 The applicant's conclusions about harmful impact seem to be based on views from the listed buildings rather than views of them in their landscape setting. The EIA, Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets Hall (pages 235-6) concludes that 'the Project would result in a moderate change to the setting of the asset resulting in a medium impact on its value. It is concluded, therefore, that the asset would experience Mid Less Than Substantial Harm.' We consider a mid-level of harm is likely, but this would be amplified by that impact on the wider setting.

Creeting Hall (NHLE 1352073, listed grade II*).

- 2.43 The applicant has considered the significance and setting of Creeting Hall in document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report (paragraphs 3.3.1184-1185). This notes that its setting includes 'surrounding agricultural landscape, with which the asset has historical and ongoing functional relationships. 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 Order Limits.'
- 2.44 The application includes figure 7.12.F244-HE35 (Viewpoint HE35), an image taken in the rear garden of the listed house from where pylon RG164 would be some 190m away. This suggests the proposed development would be screened by vegetation on the garden boundary. However, it appears from the image that pylon RG164 is, in this precise view, masked by trees and that the upper part of it does not feature in the image. It is possible it would be more clearly seen by moving the viewer slightly to the left and slightly raising the view. From that viewpoint the pylon might be clearly seen and given the distance have a pronounced, even dominant effect.
- 2.45 Furthermore, the image location does not assist in considering how the pylons might appear when approaching the house or in views of it from the east and northeast. From these directions the Hall can be seen in a shallow valley

surrounded by fields and the pylons could be pronounced features in this setting. Another viewpoint image (number 2,28, Figure 7.12.F49_VP2.28) is reasonably close to the listed building and its farmstead complex. However, this on low lying ground next to the River Gipping so any vegetation obscures much of the historic complex. This image does suggest the proposed pylons would be clearly visible from close to the Hall though a view from directly in front of Creting Hall would show the pylons more directly relating to the listed building and potentially dominating it.

- 2.46 The applicant has assessed the visual impact in the ES (volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets, page 238). This again refers to partial views from the building with no reference to landscape setting and concludes that the asset 'would experience Mid Less Than Substantial Harm.' We broadly agree with this categorisation, but in light of our comments above we are of the view that this impact could be at the upper level of mid-level less than substantial harm to the significance of the listed Hall.

St Peter's Parish Church, Creting St Peter (NHLE 1352072, listed grade I).

- 2.47 Document 6.11.A1 (Environmental Statement Appendix 11.1 – Historic Environment Baseline Report), paragraphs 3.3.507-508, describes the significance and setting of the listed church. It notes the vegetation on the churchyard boundary and nearby development but concludes that the setting would extend to the Order Limits. The proposed pylons would be close (perhaps some 600 m away) but we consider it unlikely there would be long distance views of the church that could be affected by the proposed development and views out for the churchyard would be limited. The applicant has assessed the visual impact in the ES (volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 220) and concludes that due to this screening vegetation and buildings the development would be 'occasionally visible' and result in 'lower less than substantial harm' to the significance of the listed building. We would accept this conclusion.

Badley Church Green Conservation Area including Badley Hall (NHLE 1231083, listed grade II*), Dovecot (NHLE 1231084, listed grade II*) Barn (NHLE 1231085, listed grade II*) and St Mary's Parish Church (NHLE 1231082, listed grade I).

- 2.48 Badley Green conservation area is a remarkable site containing an important group of buildings. It has a rural setting but is already affected by electricity pylons passing across part of the area. The edge of the conservation area closest to the proposed development would only be some 375 m from RG166 but image VP2.16 (Figure 7.12.F37_VP2.16) which is situated inside the conservation area near the church suggests the proposed pylons, where visible, would be distant from this part of the area and would not add to the impact of the existing pylons.

- 2.49 The ES (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report) considers the conservation area, (paragraphs 3.3.46-49), and the other assets (paragraphs 3.3.528-531). This notes that ‘the surrounding agricultural landscape, with which the elements of the Badley Hall Farm complex have a historical and ongoing functional relationship, also contributes positively to the setting’ (paragraph 531) but concludes that ‘...due the focus of the setting being on the former manorial site, the farming complex and the immediate agricultural landscape, it does not extend to the Order Limits.’ Viewpoint image VP2.16 appears to confirm this conclusion, but it is unclear if the agricultural landscape around the northern end of the conservation area would be more affected due to its proximity to the proposed development. Should this be the case it might result in a low level of less than substantial harm to the conservation area, rather than to the individual listed heritage assets.

St Mary’s Parish Church, Battsford (NHLE 1033018, listed grade I).

- 2.50 The ES (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraph 3.3.553) notes the importance of the rural setting of the church and concludes that the setting extends to the order limits. The proposed line of pylons would be some 1.1 km to east. Viewpoint image number 2.45 (Fig 2.17.F63_VP2.45) is located closer to the pylons but it shows they would be visible and detract from the rural landscape. We would agree with the assessment in the ES (volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 222) that distance between the church and the proposed development plus partial screening by vegetation would result in a lower level less than substantial harm to the significance of the listed building.

St Mary’s Parish Church, Barking NHLE 1231756, listed grade I).

- 2.51 The ES (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraph 3.3.540-541) considers the significance of the church and its setting and concludes that the setting extends to the order limits. We would agree with the assessment in the ES (volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets, page 221-222) that distance between the church and the proposed development (some 1.2 km) would reduce the impact of the proposed pylons and if visible would not amount to harm to the significance of the listed building.

Tudor Grange, Somersham (NHLE 1263029, listed grade II*).

- 2.52 The ES (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraph 3.3.1417) comments on the significance and setting of the listed building. It notes that it is approximately 660 m north of order limits but concludes that the setting does not extend to these Limits.

Viewpoint image number VP2.26 (Figure 7.12.F47-VP2.26) situated to the northwest of Somersham gives an impression of the visibility of the proposed development seen across valley. The distance is not dissimilar to the distance between the Order Limits and Tudor Grange. The image suggests the development might have no greater impact than the existing electricity pylons appearing in the same location but might still be visible from the immediate setting of the listed building, although it would probably not have an impact which would result to harm to its significance.

St Mary's Parish Church, Flowton (NHLE 1251233, listed grade I).

- 2.53 The ES (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraph 3.3.620-621) considers the significance of the church and its setting and concludes that the setting extends to the order limits. We would agree with the assessment in the ES (volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets, page 247) that distance between the church and the proposed development (about 1km), screening on the churchyard boundary and adjacent buildings would reduce the impact of the proposed pylons and where visible would potentially cause a lower level of less than substantial harm to its significance.

St Mary's Parish Church, Burstall (NHLE 1036948, listed grade I).

- 2.54 The ES (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.4.196-197) considers the significance of the church and its setting. It identifies the village setting and the agricultural land beyond it as contributing to the significance of the assets and concludes that the setting extends to the Order Limits. We would agree with this and with the applicant's assessment (in the ES, volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 250) that distance between the church and the proposed development (about 1.1 km) and screening on the churchyard boundary would result in a 'small change' to the setting and where visible it would potentially cause a lower level of less than substantial harm to its significance.

St Mary's Parish Church, Washbrook (NHLE 1194408, listed grade II*).

- 2.55 The applicants' assessment of significance and setting in document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report (paragraph 3.4.25) confirm that the setting of the church extends to order limits. The visual impact on this setting is helpfully illustrated by the viewpoint image HE24 (Figure 7.12.F232-HE24). This is taken from the south side of the churchyard so much of the view is obscured by the building itself. However, one pylon is visible and its scale in views from north of the church is clear. The view from the northern edge of the churchyard is largely rural and the development would detract from this. Although trees further from the churchyard would partly

obscure it, this might still detract from the setting, and we consider this would result in a low level of less than substantial harm to the significance of the listed building. The ES Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets concurs with our assessment.

All Saints' Parish Church, Chattisham (NHLE 1351620, listed grade II*).

- 2.56 The applicants' assessment of significance and setting in document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report (paragraph 3.4.214) confirms that the setting of the church extends to order limits. Pylon JC021 would be some 386m away from the church and possibly visible from churchyard to the south though farm buildings and planting would limit this. The ES, Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets (page 260) confirms that 'due to the partial screening [of the churchyard] ... the asset would experience Lower Less Than Substantial Harm.' We would concur with this conclusion.

Little Wenham Castle (NHLE 1003759, Scheduled, and NHLE 1033405, listed grade I), St Lawrence's Parish Church (NHLE 1033410, listed grade I) and Barn North of Castle (NHLE 1194552, listed grade II*).

- 2.57 The document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report considers the significance and setting of Little Wenham Castle and the two other highly-graded listed buildings which form part of the historic complex, St Lawrence's parish church and the barn to the north of the Castle. The complex also includes five buildings listed at grade II: Little Wenham Hall Farmhouse (NHLE 1285599), the Garden Wall Approximately 20m Northwest of Little Wenham Castle (NHLE 1033406), the Farm Buildings Complex to West of Barn and Buildings Listed 3/80 Little Wenham Castle (NHLE 1351958), the Farm Buildings Complex Approximately 50 m North of Little Wenham Castle Adjacent to South of the Churchyard (NHLE 1194648) and a monument in the churchyard (Table Tomb and Enclosing Railings Approximately 14 m South of South Wall of Chancel, Church of St Lawrence, NHLE 1194704).
- 2.58 Paragraph 3.4.269 concludes that the proposed development would be visible from the Castle roof, but otherwise its setting does not extend to the Order Limits. Paragraphs 3.4.270-271 consider the church and conclude that its setting does not extend to the Order Limits. Paragraph 3.4.535 concludes that the grade II* listed barn's setting also does not extend to the Order Limits. The grade II listed buildings are also reviewed, and it is concluded that their settings do not extend to the Order Limits.
- 2.59 Two viewpoint images have been provided with the application to help establish the extent of any impact. Figure 7.12.F209-HE3 (Viewpoint image HE3) shows the view from the roof of the Castle towards the proposed development approximately

1km away. Pylons are visible in part of this view of a landscape largely rural in character. They detract from this, but do not appear to dominate the scene. The map extract showing the location of viewpoint 3.09 (Figure 7.12.F79_VP3.09) is not detailed, but it appears to be adjacent to the grade II* listed barn at the northern edge of the complex. This image shows the line of pylons in the distance, partly hidden by the landform. They are relatively modest features in this view, but this seems to contradict the applicant's conclusion that the setting of the grade II* listed barn does not extend to the Order Limits. Given the relatively low height of the proposed pylons in this viewpoint image and the effect of vegetation and other buildings it seems likely they would not be seen from the church, at ground level at the Castle or from the grade II listed Little Wenham Hall and farm buildings NHLE 1351958 and NHLE 1194648.

- 2.60 In the ES (volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 249) the applicant concludes that the proposed development would result in a low level of less than substantial harm to the significance of the Castle. The importance of views from the Castle roof should not be underestimated, showing as they do the landscape in which it functioned as still largely agricultural in character, but we would agree with the applicant's assessment, although the harm might be closer to a mid-level. As regards the grade II* listed barn, we consider the significance of this would also be harmed, at a low level of less than substantial harm.

Stour Valley Archaeology (non-designated)

- 2.61 The ES at 3.4.130 to 136 (A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report) documents an extensive high value complex of archaeological sites which survive on both bank of the stour. This includes both prehistoric settlement evidence and a high number of ring ditches and burial features. We support the applicant's assessment of these assets as set out in the baseline report and the assessment documents.
- 2.62 We have however noted here and below that the relationship between these sites and the river to the river and the nature of the proposal to underground the cable through the Dedham Vale National Landscapes would lead to a high degree of impact. This is a critical area for construction programme which relates to both cabling and the location for works compounds and drill pits.
- 2.63 Robust policies and procedures are required in order to safeguard archaeology in the area and ensure it is managed appropriately.

Ardleigh Conservation Area, including St Mary's Parish Church (NHLE 1112060, listed grade II*).

- 2.64 The ES, document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report describes the conservation area (paragraphs 3.4.64-71) states that the conservation area 'very much retains its historical

setting...[which]... makes a considerable contribution to its value.' It also notes that 'views out into the countryside are restricted to the edges of the conservation area, especially where they give way to agricultural fields' and concludes that 'as the Order Limits are located close to the conservation area... the setting of the conservation area extends into the Order Limits.' The significance and setting of the parish church of St Mary is also reviewed in the Baseline Report (paragraphs 3.4.381-382). This states that 'the setting of the asset...makes a considerable contribution to its value, and...the setting extends to the Order Limits.'

- 2.65 Pylon TB011 would be some 247 m from the northern boundary of the conservation area. Viewpoint HE25 (Figure 7.12.F233-HE35) is within the Ardleigh conservation area, just to the south of the parish church. From this position the development is almost entirely obscured by buildings, but the visible wires give an indication of the scale of the pylons even from the centre of the village and we consider it likely there would be glimpses of them from other locations within the conservation area. As regards the outer parts of the conservation area and its setting, viewpoint image 3.11 (Figure 7.12.F80_VP3.11 Viewpoint 3.11) shows pylons being very prominent in the immediate setting of the conservation area. There is some modern development beyond the northern edge of the conservation area (which is approximately 247 m from the closest pylon), but this is low-rise and not dense. Ardleigh Court gardens and cemetery at northern edge of the area face directly onto countryside and the impact here is likely to be harmful to the significance of the area.
- 2.66 The ES Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets addresses the impact on both conservation area and the church. It concludes (page 252) that 'due to screening by mature vegetation and buildings, the Project would only be occasionally visible [from the setting of the parish church so the church] ...would experience Lower Less Than Substantial Harm.' Views from the churchyard would be in the region of 429 m from closest pylon (TB011) so we would agree with this conclusion. The conservation area is considered on page 264. Given that pylon TB011 would only be some 429 m from the conservation area boundary we question is it would be 'located at the limit of the asset's setting' and consider it might have quite a pronounced visual effect on the part of the area closest, but because of the size of the area and the significance of other parts of it we would agree with the conclusion that 'the asset would experience Lower Less Than Substantial Harm.'

Chapel Cottage, Tye Green (NHLE 1222607, listed grade II*).

- 2.67 The ES (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.5.108-109) considers the significance of the church and its setting, noting the importance of its setting in agricultural land and its position beside an historic Roman road and concludes that the setting extends to the Order Limits. We would agree with this and with the applicant's assessment (in the ES, volume 6: Environmental Statement, Document: 6.11.A7

Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 285) that distance between the building and the proposed development (about 1 km) and screening vegetation around the listed building would reduce the visual impact of the proposed development and the effect would not amount to harm to its significance.

All Saints' Parish Church, Fordham (NHLE 1239789, listed grade I).

- 2.68 The ES, document 6.11.A1, Environmental Statement Appendix 11.1 – Historic Environment Baseline Report (paragraphs 3.5.148-149) assesses the significance of All Saints' church. It goes on to describe how the 'setting does not extend to the order limits' due to planting around the churchyard and nearby historic and modern buildings. When visiting the site views from the churchyard towards the closest pylon (TB047, some 523 m away) are more open than the applicant's assessment suggests with potential for the pylons to be partly visible above or between the intervening buildings. Viewpoint image VP4.08 (Figure 7.12.F106_VP4.08) is taken from a location near the church. This shows the proposed pylons diminishing in size towards the south, but larger to the north. It also shows the church tower visible above adjacent trees and houses. This gives further cause to conclude there is potential for visual impact on the setting of the church, although this would result in harm to its significance a low level of less than substantial.

Fordstreet Conservation Area, including Wash Farm House (NHLE 1239836, listed grade II*), Barnards Farmhouse (NHLE 123974, listed grade II*), Threshers (NHLE 1110885, listed grade II*) and The Old House NHLE 1337411, listed grade II*).

- 2.69 Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report 3.5.29-31 describes the significance and setting of the conservation area, although it does not explore the landscape to the south of the settlement. What is notable about the southern end of the settlement is that historic buildings and their garden plots form much of the edge of the settlement, without later development acting as a 'buffer' to the landscape beyond in which the proposed development would be constructed. There is significant tree coverage at this end of the conservation area, but views of the proposed development are likely, and we agree with the Report's conclusion that the setting of the conservation area plays a 'crucial role in enhancing its value' and does extend to the Order Limits. The setting of the four grade II* listed buildings within the conservation area is also considered (in paragraphs 3.5.153-154) and we would accept the conclusion that their setting is within the built core of the village and does not extend to the Order Limits.
- 2.70 Viewpoint HE26 (Figure 7.12.F234-HE26) is located in the southern part of the Fordstreet conservation area and shows the scale of one of the proposed pylons. In this view they are shown rising above the buildings and as the nearest pylon (TB051) is some 190 m from the conservation area boundary it is likely to have a

quite dominant effect on the immediate approach to the conservation area from the south, diminishing the role the agricultural setting plays in the significance of the heritage asset. A further image, viewpoint number 4.29 (Figure 7.12.F121_VP4.24) is taken from beyond the edge of Fordstreet but also looking towards the line of the proposed development. This shows the pylons to be similarly major objects in the landscape.

- 2.71 The ES (Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets page 285-286) concludes that this would result in a mid-level of less than substantial harm and we would agree with that.

Barn North East of Hoe Farm (NHLE 1170078, listed grade II*).

- 2.72 The significance of the listed barn and the group within which it sits is considered in document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report (paragraph) 3.5.159. It acknowledges the importance of the surrounding agricultural landscape setting with which it has an historical and functional relationship but concludes this ‘does not extend to the Order Limits.’ The nearest proposed pylon (TB060) would be approximately 1km away from the listed buildings. The adjacent grade II listed barn (NHLE 1110895) standing to the north of the grade II * one might obscure it in views from the higher-graded asset, but it is possible it would still be visible with the listed building in views from outside the historic complex. A viewpoint image, number 4.31, is located just to the south of the farmstead (figure 7.12.F128_VP4.31). This shows the pylons clearly visible in the open, flat countryside suggesting they might be seen from the vicinity of the barn or could affect views towards it, but we would conclude that even if this were the case the effect would be unlikely to cause harm to the significance of the listed building.

Barn South West of Little Tey House (NHLE 1266779, listed grade II*).

- 2.73 Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report (paragraphs 3.5.417-418) notes that the agricultural setting of the barn (and the nearby grade II listed Little Tey House, NHLE 1266823) makes a considerable contribution to its significance and confirms that the setting extends to the Order Limits. Viewpoint image HE27 (Figure 7.12.F235-HE37) is taken from immediately south of the listed barn. The proposed pylons are very close to the building (pylon TB064 is only some 186 m away) and the land is level and open. The garden shown in the image is quite domestic and designed in character with nearby agricultural buildings and outbuildings to the property, but beyond this are trees and hedges of a wholly agricultural character over which the pylons rise.
- 2.74 The ES, Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 277 concludes ‘that the asset would experience Mid Less Than Substantial

Harm.’ We agree with this, although the dominant scale of the pylons and the importance of this side of the barn having a clearer relationship to fields would make that of a high order of mid-level high less than substantial harm.

Parish Church of Saints Margaret and Catherine, Aldham (NHLE 1170063, listed grade II*).

- 2.75 Document 6.11.A1 (Environmental Statement Appendix 11.1 – Historic Environment Baseline Report), paragraphs 3.5.344-345 considers the significance and setting of the listed building, concluding that the setting makes a considerable contribution to its significance and that it extends to the order limits. Pylons TB53 and TB54 would be close to the church (the latter some 324 m). The ES (volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 285) notes that the immediate setting of the church is within Aldham village and that there is mature vegetation enclosing the churchyard but concludes that the proposed development would result in harm to the significance of the designated heritage asset at the level of ‘Mid Less Than Substantial Harm.’
- 2.76 We agree with these comments about setting. Because of the proximity of the nearest proposed pylons, we conclude that they would detract from the setting and significance of the church and agree with the level of harm on the basis of the information available. Given the proximity of the closest pylons and their potential to dominate the church’s immediate setting, this could be at a higher level of less than substantial harm, but without an appropriate viewpoint image submitted with the application it is difficult to confirm this.

Aldham Hall (NHLE 1306270, listed grade II*).

- 2.77 Document 6.11.A1 (Environmental Statement Appendix 11.1 – Historic Environment Baseline Report) paragraphs 3.5.156-157 looks at the significance and setting of Aldham Hall noting that it (and its associated grade II listed Wagon Lodge to the north, NHLE 1337391) is only 75-100 m from the Order Limits. It also states that its setting, which includes a rural landscape makes a ‘considerable contribution’ to its significance. The ES, volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, (page 283) concludes that the proposed development would not affect the relationship between the historic buildings and that vegetation around the site would screen views to and from it. However, these trees are deciduous, and it is likely the listed Hall would have views out of the complex and itself be visible from the adjacent fields in the winter months along with the proposed pylons which, given their proximity, could be prominent in the rural setting. The viewpoint image VP4.21 (Figure 7.12.F118_VP4.21) gives an indication of the presence of the pylons in the landscape so close to the listed building. The applicant has concluded that the development would result in mid-level of less than substantial harm and we agree with this, although it could be relatively high within that level.

St James' Parish Church, Marks Tey (NHLE 1224521, listed grade I).

- 2.78 Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report (paragraphs 3.5.188-189) consider the significance and setting of the building concluding that ‘although the church and its churchyard are surrounded by some mature trees, it is likely that its setting extends to the Order Limits. There are some views from churchyard northwards, towards the proposed development and pylon TB065 would be some 434 m from the church. However, viewpoint image HE11 (Figure 7.12.F217-HE11) is situated at the church and shows the pylons visible to the north of the churchyard, partly visible through trees but not dominating the setting. Where noticeable they would detract from the surroundings, but we consider this would not harm the significance of the listed building to a high degree. ES Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets (page 265) concurs, concluding that ‘the asset would experience Lower Less Than Substantial Harm.’

Houchin's Farmhouse, Broad Green (NHLE 112318, listed grade II*).

- 2.79 The applicant's assessment of the significance of the listed building and its setting (in ES document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.6.207-208) notes how the building ‘was designed to have intervisibility with its wider surrounding rural agricultural landscape’, a landscape which makes ‘a considerable contribution to the setting of the asset.’ It also acknowledges that ‘there is likely to be clear intervisibility between this asset and the Project. The building largely remains within its original context despite its proximity to the A120 approximately 490 m to the south, with the setting of the asset extending to the Order Limits.’
- 2.80 The ES, volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets (page 288) assesses the visual impact of the proposed development. This is informed by the image taken at viewpoint HE28 (Figure 7.12.F236-HE28) which is close to Houchin's Farmhouse looking towards the development with the nearest pylon (TB070) some 420 m away. This suggests that this distance would diminish the visual impact to some degree and we would concur with the applicants' conclusion that that ‘the asset would experience Mid Less Than Substantial Harm.’

Coggeshall Abbey (NHLE 1018865, Scheduled), Abbey Mill (NHLE 1168354, grade I), the church of St Nicholas, Coggeshall Abbey (NHLE 1337925, listed grade I), Coggeshall Abbey Residence (NHLE 1307099, listed grade I), the Guest House of Coggeshall Abbey (NHLE 1307071, listed grade I) and Abbot's Lodging and Corridor (NHLE 1123191, listed grade I).

- 2.81 The Coggeshall Abbey complex lies at the eastern end of the Coggeshall conservation area on the River Blackwater, set away from the historic centre of

- Coggeshall itself. Document 6.11.A1 (ES Appendix 11.1 – Historic Environment Baseline Report paragraphs 3.6.82-87) considers the scheduled abbey site and the group of listed buildings as well as the conservation area (paragraph 3.6.25) and considers their significance and setting.
- 2.82 The Baseline Report notes (paragraph 3.6.25) that the conservation area has an inward focus, with the densely developed streets of the built-up historic core and the valley bottom of the eastern part limiting visibility towards the Order Limits. We would agree with this conclusion.
- 2.83 As regards the Abbey, the Baseline Report (paragraph 3.6.86) concludes that ‘due to their survival as elements of the abbey complex and their strong link to the river valley and the agricultural landscape, the setting of the scheduled monument (1018865), its two integral listed buildings (Abbots Lodging and Corridor and Guest House), and the Church of St Nicholas extend to the Order Limits.’ We would also agree with this conclusion. It is concluded (paragraph 3.6.86) that the settings of the Abbey Mill and other grade II assets to the south of the abbey site (the Cartlodge /Shelter Shed 60 m south of Coggeshall Abbey, NHLE 1168341, the Barn, NHLE 1123192, and the Barn 45 m south of Coggeshall Abbey, NHLE 1337926) do not however extend to the Order Limits due to being ‘restricted to their river valley locations’.
- 2.84 The applicant has assessed the visual impact of the development in the ES (volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets). This concludes (page 286) that due to distance, mature trees, the presence of other buildings and the valley topography there would be a lower level of less than substantial harm to the significance of the scheduled abbey site. This is also the conclusion as regards the Abbots Lodging and Corridor and Guest House (pages 287-289) and we would agree with that. Commenting on St Nicholas’ church it concludes (page 288) that there would be a similar level of harm due to screening vegetation. The church is on slightly higher ground above the river valley where the abbey lies and with the screening of hedgerow trees, not the larger areas of mature trees found around the abbey. We would agree with the level of harm in general but consider there might be slightly more intervisibility towards the proposed development from the immediate setting of the church.
- 2.85 We would agree that existing mature trees would affect visibility towards the proposed development from near the Abbey Mill, but as this, like the abbey site, is in the valley bottom we feel some visibility is possible despite the applicants’ conclusion (in the Baseline Assessment, paragraph 3.6.86) that its setting does not extend to the Order Limits. No viewpoint image from the Mill has been submitted to confirm either conclusion, but even if some visibility were possible this is likely to be partial and given the distance to the proposed development the impact would be of a very low level of harm, if any.

Feeringbury Manor (NHLE 1306710, listed grade II*) and Ancillary Building to Southeast (NHLE 1123828, listed grade II*).

- 2.86 Feeringbury Manor and the ancillary building (which has been suggested to incorporate the remains of a chapel) are part of a farmstead including a waterwheel mounting (NHLE 1337602, listed grade II) and barn (NHLE 1123829, listed grade II) and non-designated farm buildings of 19th century date. Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report (paragraphs 3.6.91-92) comments on the significance of Feeringbury Manor and the ancillary building. It also looks at the setting, identifying the agricultural landscape as contributing to their significance, although we consider its contribution is more than the ‘moderate’; level suggest. The section concludes by confirming that the setting of the two highly graded listed buildings extends to the order limits.
- 2.87 The closest pylon to the Manor (TB077) would be some 310m away. The ES, Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets (page 289) states that ‘due to screening by mature vegetation and buildings, the Project would only be occasionally visible.’ An image (figure 7.12.F246-HE37, Viewpoint HE37) has been provided with the application but is taken from the road beside the Feeringbury Manor complex, looking at the grade II listed barn (NHLE 1123829). The Manor and ancillary building are behind and to the north of the barn so viewpoint HE37 does not assist in determining the visibility of the proposed development from their vicinity. However, it does show the scale of the pylons to the east side of the complex. The farm buildings might wholly or partly obscure them in views from the immediate vicinity of the Manor to the east, but the development would have a pronounced impact on the wider setting on this side. The proposed line of pylons would pass to the east of the complex before turning to pass to the south. It is possible they would be seen when looking to the south from the immediate vicinity of the Manor, and although they would be further away this might still detract from the rural setting.
- 2.88 In assessing this visual impact ES Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets page 289 ‘due to screening by mature vegetation and buildings, the Project would only be occasionally visible.’ On this basis it is concluded that the highly graded listed buildings ‘would experience Lower Less Than Substantial Harm’ to their significance. No detailed comment is offered about views southward from the immediate vicinity of the Manor and ancillary building, but the applicant’s assessment seems to be wholly concerned with views out from the farmstead towards the development. What image HE37 seems to illustrate is how dominant the pylons would be when approaching it, particularly the eastern entrance to the farmyard but potentially when approaching from the south. For this reason, we consider the level of harm might be higher, perhaps approaching a mid-level of less than substantial harm.

Feering Conservation Area, including All Saints' Parish Church (NHLE 123841, grade I).

- 2.89 Document 6.11.A1, Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, comments on the significance and setting of the parish church and conservation area. Paragraphs 3.6.30-31 note the inward focus of the conservation area as defined by the Local Planning Authority document 'Feering Conservation Area Character Appraisal and Management Plan' (Place Services 2019). Paragraphs 3.6.87-88 relate to All Saints' church. It is concluded that 'any potential intervisibility [between church and the proposed development is] prevented by intervening houses and established trees and hedges.' We would agree with this and although the assessment does not consider views towards the church the tower is not a strong landscape feature. In light of these factors, we would agree that the setting of the designated heritage assets does not extend to the order limits and that any visibility of the pylons from their vicinity would not amount to harm to their significance.

Rivenhall Place (NHLE 1122598, listed grade II*).

- 2.90 Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.6.264-267 considers the significance of Rivenhall Place, the heritage assets associated with it and the historic park within which it sits. As regards its setting, the document notes that mature planting in and around the park would reduce visibility of the proposed development. We would add that this would reduce the visibility of the listed building in its wider landscape.
- 2.91 The application includes two viewpoint images to support the applicant's assessment of visual impact. Viewpoint image HE 5 (Figure 7.12.F211-HE5) is taken from within the grounds of Rivenhall Place but suggests trees on the side facing towards the proposed development would be quite effective in screening from view. However, viewpoint HE6 (Figure 7.12.F212-HE5) which is located on the approach to the listed building indicates how close the pylons would be to the immediate setting of the listed building. While they would still be in the wider setting and there is screening planting but where visible the pylons could be prominent features which would detract from the sense of a rural setting and the designed gardens themselves.
- 2.92 The ES, Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 301, concludes that 'the asset would experience Lower Less Than Substantial Harm.' Despite the proximity of the closest pylons some 400 m away it seems that where they can be seen from within the gardens of Rivenhall Place they would appear as significant features. We would agree with the applicant's assessment, though because of the proposed pylons' scale suggest the level of harm is at the high end of the lower level of less than substantial, close to mid-level harm to significance.

Parish Church of St Mary and All Saints, Rivenhall (NHLE 1169594, listed grade I) and 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 NHLE 1013831).

- 2.93 The ES (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.6.45-46) comments on the scheduled site. This states that ‘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.’ We would disagree with this assessment. Firstly, the presence of the medieval All Saints’ church is part of a long history of occupation on this site which enriches our understanding of it, rather than detracts from it. Secondly, the proposed development would affect the rural area to the north of the scheduled site, so we do not consider the presence of modern development to the south to be relevant to the assessment of impact.
- 2.94 The applicant’s assessment concludes that ‘due to overall distance and its restricted river valley location, the setting does not extend to the draft Order Limits. However, we consider that that the wider setting of the monument includes views of it and the church and that these views have the potential to be affected by the development. The same Baseline Report (paragraphs 3.6.64-65, when considering the parish church, states that ‘the setting of the church is informed by ... [its] ...location at the northern limits of the village of Rivenhall [and] the surrounding agricultural landscape... 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.’
- 2.95 The land between these heritage assets and the Order Limits is relatively open. The closest proposed pylon (TB091) would be some 987 m from the church and 833 m from the edge of the scheduled area. The application includes a viewpoint image (number HE13, Figure 7.12.F220-HE13) to help assess the likely visual impact. This is located adjacent to the parish church and shows the proposed pylons clearly visible on the horizon. We consider this would detract from what is otherwise a rural setting, although existing electrical poles which are closer to the site and already have a negative effect. This is the setting of the church but also that of the monument.
- 2.96 The applicant’s assessment of this visual impact (ES Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets, page 287) concludes that ‘the Project is located at the limit of the [church’s] setting and due to some screening by mature vegetation and buildings, the Project would only be occasionally visible. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm.’ We would agree with this conclusion for the church but also consider this would need also to apply to the scheduled monument.

Crossing Temple (NHLE 1002122, Scheduled), including Wheat Barn (NHLE 1123866, listed grade I) and Barley Barn (NHLE 1123865, listed grade I).

- 2.97 The Baseline Report (Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, pages 3.6.104-107) provides a summary of the history of this remarkable site and a brief assessment of the significance and setting of the group of heritage assets, which as well as the highly-graded designated assets also includes four grade II listed buildings: Crossing Temple Farmhouse (NHLE 1168891), the Wagon Lodge (NHLE 1169011), the Granary/Stable Block 70m South of the Farmhouse (NHLE 1123867) and the wall enclosing the walled garden 15 m east of the farmhouse (NHLE 1168978).
- 2.98 The report notes the surrounding agricultural landscape with which the heritage assets ‘have historical and former functional relationships’ and which ‘makes a considerable contribution to their value.’ It concludes (paragraph 107) that the setting of the Scheduled monument, Barley and Wheat Barns, Farmhouse and Granary/Stables extend to the Order Limits. However, it also concludes (paragraph 106) that the setting of the Wagon Lodge and Garden Wall is ‘focussed on the Scheduled Group’ to the extent that their setting does not extend to the Order Limits. As the Wall has a direct visual relationship with the land between it and the Order Limits and the Wagon Lodge is immediately adjacent to the Granary/Stables and no more or less related to other historic farm buildings than it we are unclear how this conclusion has been drawn. We consider the setting of these heritage assets also has potential to be affected by the proposed development.
- 2.99 A viewpoint image (number 5.11, Figure 7.12.F126_VP5.11) gives an indication of the likely appearance of the development in the landscape with the closet pylon (TB097) some 729 m away from the closest edge of the Scheduled area. There are trees along much of the boundary and the listed barns are in the northern part of the site (between 940 and 960 m from TB097) have boundary walls, buildings and trees potentially obscuring most clear views to the south.
- 2.100 Views from the southeastern edge of the Scheduled area are most likely to be affected by the development and the applicant’s assessment (pages 286-7 of the ES, volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets) concludes that this would result in a Lower Level of Less Than Substantial harm’ to its significance. Considering the Wheat Barn and Barley Barn the same assessment (pages 292 and 291-2, respectively) notes the adjacent buildings as a factor resulting in a ‘slight change’ to their setting but concludes some harm would result within the same category. We would agree with these assessments.

White Notley Conservation Area including White Notley Hall (NHLE 1122738, listed grade II*) and St Etheldreda’s Parish Church (NHLE 1147914, listed grade I).

- 2.101 Modern development on the southern edge of the White Notley conservation area would largely block views from it and St Etheldreda's churchyard toward the nearest pylons (some 694 m to pylon TB102 from the conservation area and over 1 km from the church). White Notley Hall is further still and has some planting on the edge of its grounds. The ES (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report) comments on the conservation area (paragraphs 3.6.22-23), the church (paragraphs 3.6.151-142) and the parish church (paragraphs 3.6.155-156), concluding that their settings do not extend to the Order Limits.
- 2.102 The application includes a viewpoint image HE14 (figure 7.12.F221-HE14). This shows the view towards the proposed development from just beyond the conservation area and suggests the pylons would be visible, but even though they would intrude into an otherwise wholly agricultural landscape would be partly below the horizon. Viewpoint 5.04 (figure 7.12.F139_VP5.04) is outside the village and closer to the pylons but here they are partly hidden by trees and where visible are not dominant features. Given the distance and scale, we consider the impact might not amount to harm to the significance of the heritage assets.

St Germanus' Parish Church (NHLE 1337803, listed grade I), Faulkbourne Hall (NHLE 1337782, listed grade I) and Faulkbourne Park (NHLE 1000341, registered grade II)

- 2.103 The proposed development's closest pylon (TB098) would be some 897 m from the outside edge of the belt of trees on the northern boundary of the Registered park. Faulkbourne Hall is in the centre of the park, some 1.4 km from the pylon line. The parish church is in the western part of the park and is more open to the north but is also some 1.2 km from the nearest pylon (TB098). The development might be seen in the landscape context of the setting of the park, but we consider the impact is unlikely to amount to harm to the significance of the heritage assets. The ES, (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.6.162 and 165) confirms this, concluding that the setting of the heritage assets does not extend to the Order Limits.

Troy's Hall (NHLE 1123457, listed grade II*).

- 2.104 The ES (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.6.149-150) comments on the significance and setting of the listed building. It states that the listed building 'was designed to have intervisibility with its wider surrounding rural agricultural landscape...which make[s] a moderate contribution to the setting' and concludes 'there is intervisibility between this asset and the Order Limits'. Pylon TB106 would be some 544 m away from the building with the main façade of the Hall facing away from the proposed development and with trees on the boundary.

2.105 The applicant does not include a viewpoint image to confirm the visibility of the proposed development but viewpoint image number 5.08 (Figure 7.12.F143_VP5.08) is to the west of the site and in a similar landscape. This gives some indication of the possible visibility of the development from near Troy's Hall. This viewpoint is some 400 m further away than Troy's Hall but does suggest the development could be quite prominent. The ES (volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets, page 297) notes the screening vegetation north of Troy's Hall and concludes asset would experience Lower Less Than Substantial Harm to its significance. We would concur with this assessment.

St Mary's Parish Church, Fairstead (NHLE 1337780, listed grade II*).

2.106 The ES (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report paragraphs 3.6.153-154) considers the significance and setting of the parish church, noting that it was 'originally designed to be viewable from the surrounding landscape' with which it 'still retains a functional and historical connection'. It states that 'there is likely to be some intervisibility between the asset and the Project' but concludes the setting of the church would not reach to the Order Limits as 'the Project is located in the neighbouring White Notley civil parish'. It is unclear why the parish location is relevant to this conclusion.

2.107 Rural historic churches are commonly landmarks visible beyond the limits of the ecclesiastical parish to which they ministered. This is particularly the case in East Anglia where prominent towers are often found, the result of local church building traditions over several centuries. But rather than acting as some form of limit to setting these long-distance views over multiple parish areas (which can include intervisibility from one church to another) actually enhance an understanding of their role within a large pattern of historic faith communities.

2.108 Setting this aside, viewpoint image number 5.08 (Figure 7.12.F143_VP5.08) is supplied with the application to assist in assessment of impact. This was taken from the opposite side of the village lane from the church and shows pylons in the distance adding to the effect of an existing one. The proposed pylons appear to be some 900 m from the church and are not dominant in this view, but we consider they would further detract from the otherwise rural character and result in a low level of less than substantial harm to the significance of the church.

Newney's Farmhouse, Ranks Green (NHLE 1123450, listed grade II*).

2.109 The line of proposed pylons would be some 250m from Newney's Farmhouse, compounding the effect of an existing line of pylons approximately 1.3km away. The ES (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.6.137-138) considers the significance of Newney's Farmhouse as well as the adjacent grade II listed barn to the

southeast (NHLE 1337819). This notes that the group and its surrounding landscape 'considerably contribute' to the significance of the highly graded listed building, the setting of which extends to the Order Limits.

- 2.110 The ES, Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets page 293, concludes that due to 'screening by mature vegetation and buildings, the Project would only be occasionally visible' from the immediate vicinity of the listed buildings resulting in 'Lower Less Than Substantial Harm.' Figure 7.12.F237-HE29 is a viewpoint image (number HE29) taken to the south of Newney's Farmhouse with the nearest pylon 220 m away while the distance from the listed building to the nearest pylon is approximately 250 m. There is some vegetation on the boundary between the listed building and the fields between it and the proposed development, but given their scale and proximity it seems likely the pylons will be clearly visible from the immediate setting of the house as well as possibly appearing above the house in views along the lane to the north of the property (an effect not considered by the applicant).
- 2.111 There are some existing electrical poles in this part of the house's setting, but these do not detract from the rural character in the way the much larger pylons would and we consider their scale at this distance would result in a mid, or possibly approaching high level of less than substantial harm to the significance of the grade II* listed building.

St Mary's Parish Church, Great Leigh (NHLE 1171104, listed grade II*).

- 2.112 The parish church is some 750 m from the proposed line of pylons with woodland and some building between them. The ES (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.7.132-133) considers the significance and setting of the church, noting the value of the rural setting but concluding that its setting would not extend to the Order Limits. Figure 7.12.F238-HE30 is a viewpoint image (number HE30) is situated just to the north of the church looking in the direction of the proposed development and confirms that vegetation between them would screen the pylons. We conclude that this would not result in harm to the significance of the listed building.

Little Waltham Conservation Area.

- 2.113 Document 6.11.A1, Environmental Statement Appendix 11.1 – Historic Environment Baseline Report (paragraphs 3.7.38-46) gives a detailed summary of the conservation area and its setting. The village is based on a main road crossing the valley with the River Chelmer to its west and south. The Report considers the significance of the conservation area and its setting and concludes that the latter would extend to the Order Limits. The ES, Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets (pages 326-327), concludes that due to screening by mature vegetation, buildings and infrastructure the development

would only be 'occasionally' visible. This seems based on limited consideration of the area's setting.

- 2.114 The proposed pylons would be some 200 m from the edge of the conservation area and some 400 m from the rear of buildings on The Street. We would accept that views from the street might be partial, but where visible the proposed pylons could have a pronounced visual impact because of their proximity. Furthermore, the conservation area boundary projects to the west of The Street buildings and from this area the development would be more visible. Also, in views towards the western side of the conservation area the pylon would be a significant feature in the landscape.
- 2.115 Figure 7.12.F224-HE16ii (Viewpoint HE16ii) is an image taken from between Little and Great Waltham looking southwest, away from Little Waltham. The reverse view, looking towards Little Waltham is Figure 7.12.F223-HE16i (Viewpoint HE16i). Together these gives an impression of the likely scale of the proposed pylons in the wider setting of the Little Waltham conservation area. More directly pertinent is Figure 7.12.F239-HE31 (Viewpoint HE31). This image is taken from an area of open land at the southern end of the conservation area, near the river Chelmer in a valley between Great and Little Waltham which forms the wider setting of both. Part of the pylons is obscured by tree planting but the presence of the pylons in the landscape setting of the conservation area is clear. At the northern end of the conservation area viewpoint 6.13 (figure 7.12.F168_VP6.13) is situated just outside the area, beside the main road, but the scale of the pylons can again be seen. We consider this effect would detract from the rural setting even though the modern bypass road has already had a negative effect.
- 2.116 We consider these factors would result in harm to the significance of the conservation area and although we would not disagree with the applicant's conclusion (in the ES, volume 6: Environmental Statement, Document: 6.11.A7, Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, pages 326-327) that this would be less than substantial harm conclude that it would be higher within that category.

Great Waltham Conservation Area including St Lawrence's Parish Church (NHLE 1122058, listed grade I), Badynghams (NHLE 1122056, listed grade II*), Langley Park (NHLE 1000241, Registered grade II) and Langleys (NHLE 1305533, listed grade I).

- 2.117 The conservation area at Great Waltham incorporates the house and registered park of Langleys as well as the historic village. The significance of all these assets is summarised in the application (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report) and the setting considered. As the report notes, there are distinctly different settings for the village and park, but both relate at least in part to the Chelmer river valley through which the route of the proposed development runs. Paragraphs 3.7.30-37 comment on the conservation area, noting its 'beneficial views over the Chelmer river valley'

and concluding that its setting extends to the Order Limits. Within the conservation area are two highly graded listed buildings. The report comments separately on the settings of St Lawrence's church and Badynghams house, concluding that they chiefly relate to the core of the built settlement (paragraph 3.7.127 and Table A11.1.6, page E85, respectively) and do not extend to the order limits. We would accept these conclusions.

- 2.118 As well as forming part of the conservation area Langleys Park is given additional consideration in paragraphs 3.7.305-308 of the Baseline Report. This notes how the setting of Langley's house and parkland are '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 Order Limits.' We would accept these observations and the conclusion.
- 2.119 A number of viewpoint images have been provided with the application to help illustrate the likely visual impact on the setting of these heritage assets. Viewpoint image HE7 (Figure 7.12.F213-HE7) situated in Langley Park looks northeast from a location near the coach house and confirms the pylons would not be visible from here. Figure 7.12.F222-HE15 (Viewpoint HE15) is an image from the north-northwest of the park and shows pylons visible above trees at the park edge. This affects an appreciation of the park's agricultural setting and would detract from it. Viewpoint HE8 (Figure 7.12.F214-HE8) is situated in the northeast area of the park looking to the southeast where the proposed pylons would be visible through and above the trees.
- 2.120 This would also detract from the parkland quality of the house's setting and from the park itself. Considering the wider setting of the eastern part of the registered park, is viewpoint HE16i (Figure 7.12.F223-HE16i,) looking towards Little Waltham and the edge of the park, while viewpoint 6.16 (figure 7.12.F172_VP6.16) is situated just to the northeast of the registered park. These images give an impression of the likely scale of the proposed pylons in the wider setting of the registered park. Despite the presence of the existing road this is still a predominantly rural setting from which the proposed development could detract, resulting in a low level of less than substantial harm to its significance in addition to that found in views from within the park.
- 2.121 Separating the village part of the conservation area from the park, we consider the southern tip of the area (known as Minnow End) is particularly likely to be affected by the presence of the proposed pylons in the landscape (as illustrated in viewpoint HE16i) and would agree with the applicant's assessment (ES, volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 326) that there would be lower less than substantial harm to the significance of the conservation area. Combined with this is the effect on the registered park and Langleys house,

also part of the conservation area. As well as visibility from within the park (viewpoint images HE8 and HE15, referenced above) the setting of its outer edge is within the same valley as the rest of the conservation area and would also be affected by the proposed development in a manner similar to that depicted in viewpoint HE16i.

- 2.122 We would agree with the assessment (on page 309 of document 6.11.A7, ES Appendix 11.7) that Langleys house, partly screened by planting, would experience a lower level of less than substantial harm but because of visibility from within the park as well as the effect on its setting a mid-level of less than substantial harm would be caused to the significance of the registered park. Given that the park is a large and important element of the conservation area this might also increase the level of harm to the area as whole.

Broomfield Conservation Area and St Mary's Parish Church (NHLE 1338425, listed grade II*).

- 2.123 The applicant has considered the significance and setting of the conservation area and parish church in the ES (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.7.49 and 3.7.149-151). This notes how late 20th and 21st century development around the conservation area screens much of it from the wider landscape but that the western part, including the churchyard of St Mary's parish church. does have a relationship with this land. The assessment concludes that the conservation area's setting does not extend to the Order Limits, but that despite planting around the churchyard the setting of the parish church does. Given that the church and churchyard are part of the conservation area this appears a contradictory conclusion and we would suggest the setting of the conservation area also extends to the Order Limits at this point.
- 2.124 The ES (Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 306) states the proposed development would result in a 'small change' to the setting of the church with the result of causing a lower level of less than substantial harm to its significance. Given the distance between the church and the nearest pylons (well over a kilometre) we consider this would be a low level of impact and accept the applicant's conclusion but feel this should also be applied to this part of the conservation area.

Former Parish Church of St James, Chignall St James (NHLE 122199, listed grade II*).

- 2.125 The former parish church is situated in a small churchyard with light trees on the west boundary and some nearby buildings but is some 300 m from the line of the proposed pylons. Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report (paragraphs 3.7.188-189) states that 'the church has a quaint and rural location with views out across the open rural landscape to the... Project. The setting of the asset makes a considerable

contribution to the value of the asset and due to the proximity of the Project, the setting extends to the Order Limits.' Viewpoint image number VP6.20 (figure 7.12.F176_VP6.20) is taken from a location near the church and gives an impression of the likely scale of the proposed pylons in the open, flat landscape around the listed building.

- 2.126 In Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets (page 308) due to screening vegetation there would be 'Lower Less Than Substantial Harm' to the significance of the listed building. The viewpoint image emphasises how close the pylons would be in this otherwise rural setting and we consider this might be a higher level of harm, perhaps approaching a mid-level.

Chobbings Farmhouse (NHLE 1306286, listed grade II*).

- 2.127 Document 6.11.A1 (Environmental Statement Appendix 11.1 – Historic Environment Baseline Report), paragraphs 3.7.196-197, considers the significance of the listed Chobbings Farm house and the adjacent grade II listed barn and granary (NHLE 1237444 and 1237445, respectively). It notes the positive contribution of the agricultural landscape but concludes that 'due to distance and partial screening by development and mature tree-lined hedgerows in the intervening landscape the setting does not extend to the Order Limits. Viewpoint image number HE39 (Figure 7.12.F248-HE39) has been provided with the application to aid in assessing any potential visual impact. This is a view from across the road junction between Chignall Lane and Hollow Lane looking towards the line of proposed pylons to the west. Unfortunately, the viewpoint position chosen means the pylons to the northwest of the listed buildings (including TB153 and TB154 which are some 700 m from it) are obscured by the Farmhouse itself. Those further to the west are visible, giving a sense of the scale the pylons which might have been shown if a more appropriate location at the rear of the listed building had been selected. There is some planting on the rear garden boundary, but the land is flat, open countryside and views to development are likely and, in our view, could result in a low level of less than substantial harm to the significance of the listed building by detracting from its rural setting.

Moor Hall, Writtle (NHLE 1237175, listed grade II*).

- 2.128 Document 6.11.A1 (Environmental Statement Appendix 11.1 – Historic Environment Baseline Report), paragraphs 3.7.158-159 considers the significance and setting of the listed building. It concludes that there is likely to be intervisibility between it and the proposed development and so the setting does extend to the Draft Order Limits. Figure 7.12.F249-HE40 (Viewpoint HE40) shows the view from just to the south of Moor Hall. From here the pylons are clearly visible in the open, flat landscape. There is planting on the eastern side of Moor Hall but views from its gardens are possible and could feature pylons detracting from the rural landscape and significance of the listed building.

2.129 Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets (page 308) concludes that 'due to some screening by mature vegetation and buildings the Project would only be occasionally visible... [so the listed building] ... would experience Lower Less Than Substantial Harm' to its significance. We would concur with this assessment.

Hylands Park (NHLE 1000197, Registered grade II*) and Hylands (NHLE 1264253, listed grade II*).

2.130 Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report 3.7.464-465 gives extended consideration of the significance and setting of the Registered Park along with the mansion house at its heart and the associated grade II listed 'Cottage (¼ mile North-West of Hylands House, NHLE 1264142). This draws the reasonable conclusion that the house would not be visually affected by the proposed development (which would be some 1.5 km away) because of the planting within the park and particularly the belt of trees around its western edge which is intended to create an enclosed designed landscape area. This is shown by the image from viewpoint number 6.26 (figure 7.12.F187_VP6.26), situated in the centre of the park.

2.131 When discussing the area beyond the Registered Park boundary the Baseline Report mentions the eastern side (where modern development is found), but not the western. Despite this it is concluded that 'the setting of the park does not extend to the Order Limits to the west ... [due to the] ... intentionally placed tree belt.' This seems to disregard that the western tree belt is itself part of the Registered park within the designation boundary. The land to the west of the outer edge of the tree belt is therefore the setting of the designated heritage asset. This land is not considered by the applicant but is part of the area in which the development is proposed.

2.132 The park, like the designed landscapes of many large rural houses, was surrounded by agricultural land. This was the case until the expansion of Chelmsford changed Hyland Park's eastern setting (as described by the applicant) but to the west it largely remains agricultural. We consider this is a positive element of the Registered park's setting which contributes to its significance. No viewpoint image has been provided to establish the impact of the proposed development on this rural setting. The proposed line of pylons is mostly at some distance from the park, but at one point comes near to its southern extent and would be some 600 m from the designated park boundary. We consider this could detract from this element of Hyland Park's setting and result in a low level of less than substantial harm to its significance.

Ingatstone Hall (NHLE 1187315, listed grade I), Gatehouse and Courtyard Ranges (NHLE 1197286, listed grade II*) and Granary 130m northwest of Ingatstone Hall (NHLE 1298752, listed grade II*, formerly listed as 'barn').

- 2.133 Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report (paragraphs 174-183) considers the significance of Ingatestone Hall, the Gatehouse and Courtyard Ranges and the Granary. It also considers the 8 grade II listed buildings in the complex: Lodge Cottages (NHLE 1187393), Barn 110m northwest of Ingatestone Hall (NHLE 1297189), Shelter Shed and Byre (NHLE 1197288), Byre 80 m northwest of Ingatestone Hall (NHLE 1197287), Cistern House (NHLE 1187282) and garden walls to the north of the Gatehouse (NHLE 1187300) and north and east of the Hall (NHLE 1297190). These form a group with the highly graded listed buildings.
- 2.134 Paragraph 184 considers the ‘setting of the Ingatestone Hall complex’ and describes how ‘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 [St Mary’s, Buttsbury, NHLE 1264434] beyond in the east. The setting of the assets, therefore, makes a considerable contribution to their values...’ It concludes that ‘the shared setting of the...listed buildings...extends to the Order Limits.’
- 2.135 The views referred to are of predominantly agricultural land and two viewpoint images provided with the application give an impression of the likely visual presence of the proposed development in it. Viewpoint HE32i (figure 7.12.F240_HE32) is situated close the grade II listed Cistern House, just to the east of Ingatestone Hall while viewpoint HE32ii (figure 7.12.F241-HE32ii) is slightly further east on more open ground. Both images show that despite the planting around the historic complex the development can be seen from some locations where the pylons would be visible, although they would be approximately 1km from the Hall. Viewpoint image VP7.09 (figure 7.12.F191_VP7.09) is further from the listed buildings, west to Ingatestone Hall and some 1.3 km from the nearest pylon. However, it shows the pylons rising above the roof of the Hall and making a striking intervention into the landscape between it and the ridge on which St Mary’s church, Buttsbury, stands.
- 2.136 The relationship between the church and the Ingatestone complex could therefore be affected. We consider this would detract from the rural setting of the complex of listed buildings including the Hall and Gatehouse and Courtyard Ranges as well as the grade II listed buildings in the eastern part of the group. The Granary is partly screened by other buildings and views from its immediate vicinity are likely to be fewer with less likelihood of visual impact, as they are for the grade II listed buildings in the western part of the complex.
- 2.137 In the ES (Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 330) the applicant concludes that the proposed development would result in a lower level of less than substantial harm to the significance of the Hall and Gatehouse/Courtyard Ranges. We would accept this conclusion. We would note that the applicants’ conclusion that the ‘setting of the Ingatestone Hall complex’ extends to the Order Limits in the Baseline report (paragraph 184) specifically

excludes the listed garden wall (north and east of the Hall, NHLE 1297190) and the Cistern House (NHLE 1187282). This is on the basis that the settings of these assets 'are restricted to the confines of the Ingatestone Hall complex'. However, it appears from Viewpoint HE32i that the visual experience of the Cistern House might be affected by the appearance of the proposed development in the landscape beyond the Ingatestone Hall complex. Part of the garden wall north and east of the Hall borders open fields to the east of the complex and so is likely to have a setting which would be affected by the proposed development. We consider this would be a modest effect, perhaps resulting in a lower level of less than substantial harm to their significance.

St Giles' Parish Church, Mountnessing (NHLE 1208238, listed grade I).

2.138 Document 6.11.A1 (Environmental Statement Appendix 11.1 – Historic Environment Baseline Report), paragraphs 3.9.97-98 is quite eloquent about the significance of the church and the qualities of its setting, saying how the building is a 'visual anchor and focal point' in 'broader surroundings [which] encompass a peaceful rural road and expansive agricultural fields.' It concludes that 'the church setting makes a considerable contribution to its value and extends to the Order Limits.' In Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets (page 330) the distance between the church and the proposed development as well as the vegetation around the churchyard are noted as factors which would reduce visibility between them.

2.139 From the western part of the churchyard planting around its edge might obscure the proposed pylons (which would be some 700 m away), but there are views from the eastern end in which they would be seen, although they would be on lower ground so might be partly hidden by the landform. In views eastwards from near the church (as depicted in viewpoint image number VP7.02, figure 7.12.F184_VP7.02) the line of pylons would be clearly visible above distant trees, and they might have a similar effect in views towards the listed building. The development would again detract from the agricultural setting. In light of these visual impacts, we agree with the applicant that there would be harm to the church's significance, at the lower end of the less than substantial category.

St Mary's Parish Church, Buttsbury (NHLE 1264434, listed at grade II*).

2.140 The applicant has assessed the significance of the listed building and its setting in the ES (document 6.11.A1 (Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.7.80-810). This states 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.' We would agree with this, although we do not consider the loss of the medieval settlement which might once have accompanied the church reduces the contribution the setting makes to its significance in any meaningful

way (as suggested by the applicant). The rural character and agricultural use of the land make a more than moderate contribution to the asset's significance.

- 2.141 The applicant concludes that 'due to the proximity of the Project, the setting extends to the draft Order Limits.' The proposed development would be very close to the church with the nearest pylon (TB190) some 259 m away. This would have a quite dominant effect on the experience of viewing the church from several angles.
- 2.142 A viewpoint image included with the application (number 7.01, (figure 7.12.F183_VP7.01) is taken from close to the churchyard entrance and shows the proposed development as a major feature close to the listed building. Another image, viewpoint number VP7.12 (figure 7.12.F194_VP7.12) looks towards the church from the east and shows the proposed pylons as unavoidable visual intrusions into the open landscape in which the church would be seen. The church is located on a ridge with land falling away to the west, towards the historic complex around Ingatestone Hall (NHLE 1187315). The church can be seen on this ridge when approaching from the direction of Ingatestone. Viewpoint image VP7.09 (figure 7.12.F191_VP7.09) is a considerable distance to the west of the church but usefully suggests the presence the line of pylons would have in the landscape below the ridge on which it sits. When approaching Buttsbury church from this side they could affect long distance views of the church.
- 2.143 The ES (volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 341) accepts that 'the pylons would be visible from the asset', and they would alter the character of the rural setting of the asset. We would also contend that they would influence views from fields looking towards it as well which would compound this effect. The applicant concludes that 'the asset would experience Mid Less Than Substantial Harm' to its significance. We would accept this but given the proximity of the pylons and the visual impact from a number of viewpoints mentioned above conclude this would be at the high level of that category of harm.

Hutton conservation area, including Hutton Hall (NHLE 1280481, listed grade II*) and All Saints' parish church (NHLE 1297263, listed grade II*).

- 2.144 The applicant has assessed the significance of the assets and their setting in the ES (document 6.11.A1 (Environmental Statement Appendix 11.1 – Historic Environment Baseline Report). Hutton Hall is situated within the conservation area but is screened by extensive woodland preventing views out towards the countryside or back towards it from the area of the proposed development.
- 2.145 We would agree with the conclusion (in paragraph 3.8.209) that the setting of the hall does not extend to the Order Limits. On the conservation area as a whole the assessment (paragraphs 3.8.33-34) notes how 'the setting makes a considerable contribution to [its] value' and that its setting extends to the Order Limits. The

church of All Saints is at the edge of the conservation area, with the woodland between it and Hutton Hall behind, but open fields from the churchyard to the proposed development. Paragraphs 3.8.99-100 note that the church is some 130 m from the order limits and concludes that the setting, which makes a 'considerable contribution to its value', extends to the Order Limits.

- 2.146 Viewpoint image 7.03 (Figure 7.12.F185_VP7.03) is taken from the edge of the conservation area, slightly closer to the proposed development than the parish church and shows the likely appearance of the pylons in the landscape setting of both heritage assets. There are similar views towards them through planting on the churchyard edge. The church is a relatively small one and does not have a dramatic presence in the wider landscape, but we consider it possible that during winter it might be partly visible in views which would also include the proposed development.
- 2.147 Looking at the operational effects of the proposed development the ES (volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets) considers that the conservation area (page 339) would 'experience lower less than substantial harm'. Paragraph 331 concludes that due to the distance and partial screening this would also be the level of impact on the parish church. We would accept these conclusions, although we would suggest that there could be additional visual impact on the church from views towards it also including the pylons, as noted above.

Burstead Conservation Area.

- 2.148 The applicant has assessed the significance of Burstead conservation area and its setting in the ES (document 6.11.A1 (Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.8.43-47), noting the presence of extensive vegetation on the edge of the conservation area towards the proposed development but considers that because of some views through this the setting does extend to the Order Limits. Looking at the operational effects of the proposed development the ES (volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 339) notes this screening vegetation but considers that occasional views could result in the heritage asset 'experience lower less than substantial harm'. The line of pylons would be at some distance (approximately 1.3 km) from the conservation area boundary, but we would accept that where they might be visible any harmful impact would be of such an order.

St Clere's Hall, Stanford Le Hope (NHLE 1111565, listed grade II*).

- 2.149 The applicant has assessed the significance of St Clere's Hall and its setting in the ES (document 6.11.A1 (Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraph 3.9.217). It notes that the property boundaries are close to the listed building and lined by mature vegetation to the

east, south and west. It is stated that the house was formerly surrounded by agricultural land but the presence of modern development which has grown out from Stanford le Hope and the nearby roads have changed the setting.

- 2.150 The applicant's assessment concludes that the setting of St Clere's Hall 'does not contribute to the asset's value' because of these changes, but the view from the Hall northwards is still of an agricultural field and there is more open green space to the west which flanks a view of the important northern elevation of the building. To say that this makes no contribution whatsoever to the significance of a house originally built in such a landscape seems excessive, although we would accept that even this surviving setting is much degraded and makes a modest contribution. The proposed development would be close to the listed building (the pylons some 600 m away) but even at this distance is unlikely to be visible from the Hall itself.
- 2.151 We consider the development would affect the experience of viewing the north front of the Hall, but it would be a framing element in a setting of diminished importance so would conclude that this would not amount to harm to the significance of the listed building despite the proximity.

West Tilbury CA, including 'Earthworks near Church, West Tilbury' (NHLE 1002199, Scheduled), St James' Parish Church (NHLE 1111541, listed grade II*) and Marshall's Cottages, West Tilbury (NHLE 1337058, listed grade II*).

- 2.152 The applicant has assessed the significance of the conservation area, listed church and Marshall's Cottages their setting in the ES (document 6.11.A1 (Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.9.27-30, 3.9.3.9.149 and 3.9.144-146, respectively) and concludes that it extends to the Order Limits. When considering the operational effects the assessment (in Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets) concludes that the 'occasional' visibility of the development would cause a 'small change' in the setting of the conservation area, scheduled monument (page 349) and parish church (page 344) would all 'experience Lower Less Than Substantial Harm' to their significance. We would accept that conclusion.

3 Environmental Statement Comments by Chapter

Chapter 4: Description of the scheme

- 3.1 Table 4.3 outlines the elements of the scheme. It is noted that several of the elements will have a below ground impact, but the depths of impacts have not been defined. It is therefore difficult to understand how the proposed development may impact any buried archaeological that may be present within the proposed scheme area.
- 3.2 It is also not possible to understand how the proposed development may impact the local water environment, which could impact the condition of nearby archaeological sites and deposits of palaeoenvironmental potential that are preserved through waterlogging (anaerobic conditions). It should be noted that the effects of changes to the local water environment can extend beyond the red line boundary of a scheme area and so impacts to archaeology in adjacent areas will also need to be considered.
- 3.3 For some elements of the proposed scheme, the minimum impact has been stated. For example, it is stated in Table 4.3 that the underground cable trenches would be at minimum 0.9 m deep. We would need to assume a worst-case scenario for possible impacts on the historic environment if additional information is not available, both in terms of direct physical impacts and through potential impacts to the local water environment.
- 3.4 Table 4.4 summarises the design scenario for the proposed scheme. It is noted that some of the elements will require Horizontal Directional Drilling (HDD) to cross features such as rivers. If this technique is to be used, the potential issues associated with bentonite slurry outbreak will need to be considered in terms of the impact (both direct and indirect) that this may have on any buried archaeological remains.
- 3.5 The impacts of the HDD on the deposits that are cut through will also need to be considered, particularly in areas of peat where there is potential for organic remains to be preserved. Cutting through waterlogged deposits may impact the preservation of adjacent deposits, which may result in the degradation and loss of organic archaeological remains.
- 3.6 Some elements of the scheme will require piled foundations. Piling will impact buried archaeological remains and deposits of palaeoenvironmental potential. Piles can impact the historic environment directly, through physical impacts or through changes to the local water environment that results in the degradation and loss of waterlogged remains. We would recommend that the following Historic England documents are referred to: Piling and Archaeology (<https://historicengland.org.uk/images-books/publications/piling-and-archaeology/>) and Preserving Archaeological Remains (<https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>).

Chapter 11: Cultural Heritage

- 3.7 We note the applicant has provided details of the policy context and relevant guidance and summary of engagement, which includes Historic England. We can confirm we have been party to extensive pre-application discussion with regards to the scheme and we provided advice at the scoping and PEIR stages and throughout the pre-examination period.
- 3.8 The chapter notes that Magnetometry surveys have been carried out in the different sections of the project, but it is noted that not all of the surveys areas have been completed (for example Sections 11.5.22 to 11.5.24, Section 11.5.55 and 11.5.56, Section 11.5.60, Sections 11.5.99-104, Section 11.5.156 & Section 11.5.158, Sections 11.5.196-5.11.200, Sections 11.5.219-5.11.224, Sections 11.5.241-11.5.245, Section 11.5.265).
- 3.9 It was noted that some of the areas included in the survey represented former natural river channels (e.g. Section 11.5.26, Section 11.5.59). The geoarchaeological assessment has identified peat and alluvial sequences in these areas (e.g. Section 11.5.29-11.5.30, 11.5.59), which can act to mask archaeological features and remains, making it difficult to evaluate these areas using techniques such as magnetometry. Additional techniques will therefore need to be used to evaluate these areas, such as alternative geophysical techniques, geoarchaeology or additional trial trench evaluation excavations.
- 3.10 Magnetometry will generally not identify organic remains that may be preserved in wetland environments, such as wooden structures (post alignments, fish traps etc.) or artefacts made of wood or leather.
- 3.11 It is stated that the priority archaeological trial trench investigations have not been undertaken for large parts of the proposed scheme (e.g. Section A (Section 11.5.27), Section B (Section 11.5.64-11.5.66), Section D, Area 43 (Section 11.5.166), Section E (Section 11.5.202), Section F (Section 11.5.225, Section G (Section 11.5.246), Section H (Section 11.5.268-11.5.270)).
- 3.12 In addition, none of the Phase 2 trial trench investigations have been completed. There is therefore only limited evidence available to understand the archaeological potential of this area, or the potential impact of the proposed scheme.
- 3.13 A programme of geoarchaeological monitoring has been carried out for key areas across the proposed scheme area, particularly within the river valleys. This work has identified complex sequences (e.g. Section 11.5.30, Section 11.5.68, Section 11.5.125, Section 11.5.173) which included deposits of high archaeological, palaeoenvironmental and geoarchaeological value such as peat (Section 11.5.33, Section 11.5.72, Section 11.5.129, Section 11.5.177).
- 3.14 It is stated that no geoarchaeological and palaeoenvironmental assessment is proposed at this stage (Section E (Section 11.5.203), Section F (Section

11.5.226), Section G (Section 11.5.247)). It should be clarified if work is proposed to be carried out post-consent/pre-construction.

- 3.15 In relation to the evaluation phase, we are aware that this is only a partial assessment. There are gaps in the walkover surveys and geophysical survey, areas have not been trial trenched and no further geoarchaeological and palaeoenvironmental assessment has been undertaken prior to the examination. Whilst all parties have acknowledged this as an issue, it still represents a major risk to the project going forward. It is also a concern for Historic England and will need to be taken into consideration by the ExA in relation to policy and decision making.
- 3.16 It is good to see that the primary embedded mitigation focuses on avoidance of sensitive heritage assets through routing and siting elements of the scheme (Section 11.6.4). It is also stated that undergrounding cables in four locations, such as the Dedham Vale National Landscape also forms part of the embedded mitigation strategy. It should be noted that while underground cables will reduce the impact of the proposed development on the setting of heritage assets, that buried archaeological features, remains and deposits could be affected. The impacts could be direct, through physical impacts, or through changes to the local water environment that in turn affects the preservation of organic archaeological remains.
- 3.17 Standard mitigation is presented in the Outline Code of Construction Practice (OCoCP) and includes measures such as the development of WSIs for archaeological work, preservation strategies, and investigations where necessary (Section 11.6.6).
- 3.18 Additional mitigation measures have also been outlined in the Outline AMS-WSI for measures over and above any embedded and standard mitigation measures. For archaeology, this includes archaeological mitigation, post-excavation analysis and publication (Section 11.6.11).
- 3.19 Section 11.7 presents the potential residual effects that may occur due to the proposed development. The discussions focus on impacts due to changes in setting of heritage assets, or through physical impacts during construction. The potential issues relating to changes to the local water environment, which may affect the preservation of organic archaeological remains and deposits is not mentioned in this section. It should be noted that the effects of changes to the local water may be felt outside of the red line boundary of the scheme and may therefore affect archaeological remains in adjacent areas.
- 3.20 It is not clear if the potential impacts of the scheme on palaeoenvironmental remains recorded within the different Sections of the scheme have been included in the discussions of effects to the historic environment. The geoarchaeological work identified deposits of high potential, and the impacts of the proposed scheme would need to be considered, managed and mitigated.

- 3.21 11.8 states that archaeological mitigation will be undertaken during the pre-construction work and includes non-intrusive and intrusive fieldwork. The works have been outlined in the Outline AMS-OWSI and will be presented in the relevant Detailed WSIs.

Chapter 12: Hydrology, Land Drainage and Flood Risk

- 3.22 It is noted that dewatering of excavations may be needed for key locations within the proposed development area. Dewatering can impact the historic environment by altering the local water environment, which may affect the preservation of nearby waterlogged archaeological remains. This may result in the degradation and/or loss of organic archaeological and palaeoenvironmental remains.
- 3.23 We would recommend that the impacts on buried archaeological remains are considered when discussing the impacts of dewatering and changes to the local water environment.
- 3.24 We would also recommend that the information is shared with archaeologists to help guide the mitigation strategy for the proposed development. For example, if an unexpected waterlogged archaeological site is discovered during construction, an appropriate stand-down buffer will need to be maintained around the site while it is being investigated to ensure that the remains are not dewatered.

Appendix 11.3: EACN Substation Geophysical Survey Report

- 3.25 This report presents the results of the magnetometry survey on the block of land identified for the EACN Substation.
- 3.26 No features of probable arch potential have been identified, but it is not clear if this is a function of the geology.

Appendix 11.4: Geophysical Survey Results Report

- 3.27 It is noted that the report represents an interim report for the surveys carried out for the Priority Areas and that the final report will be submitted at a later date (Section 2.5). The full assessment of the results has not yet been carried out for the interim report, and so the results are of limited use at this stage.
- 3.28 It is stated in Chapter 11 of the main Environmental Statement that the survey work in the Priority Areas had not been completed at the time of submission. This report does not mention that there is any outstanding work left to complete. This information should have been included in as a figure, so it is clear.
- 3.29 An interim report of the Phase 2 Geophysical survey work has not been included in this report. Will this information be provided to inform the examination of the proposed scheme?
- 3.30 A magnetometry survey was proposed, but it is noted in the description of the different Section Areas that they cross several river valleys. The superficial

geology recorded in these sorts of locations includes peat and alluvium, that can act to mask archaeological features and remains. In addition, magnetometry may not be able to identify organic archaeological remains, that can be preserved in these sorts of environmental (e.g. trackways, fish traps, boats etc.). We would therefore recommend that alternative evaluation approaches are used in these locations due to the risk of unexpected features and remains being present.

Appendix 11.5: Trial Trenching Results Report

- 3.31 A total of 16 high priority areas were identified for the first phase of Trial Trench evaluation excavation, which were subdivided into 58 distinct Area parcels. The title of this appendix indicates that it will present the results of the Trial Trenching work, but it is stated that interim reports have been provided. The full reports have not been included with the DCO submission, and only limited information is therefore available.
- 3.32 None of the interim reports, with the exception of Site 001 (EACN Substation, Ardleigh), include details of the type of samples collected (bulk samples, specialist samples etc.) or if the samples have been processed. No information is available about the range of environmental remains that were recovered, their condition or their potential. Hand collected environmental remains are quantified, but details are not included about the condition of the bone, or if there is evidence of butchery marks on the bone.
- 3.33 The lack of information available from the interim reports will significantly limit the conclusions that can be drawn about the archaeological potential of the proposed scheme area and of the potential impacts. If the information is not available, a worst-case scenario will have to be assumed.
- 3.34 The evaluation excavations of Site 8, Area 15S confirmed most of the features identified in the geophysical survey, but that additional features were revealed towards the north of field 4, and north and south of fields 5 and 6 respectively. This suggests that there will be potential for previously unknown remains to be present within other areas of the proposed scheme area.
- 3.35 The quantification of the archive for Site 8, Area 15S states that 21959 g of CBM/fired clay was recovered from the evaluation excavations. It is stated that a high quantity of CBM was recovered in the text, but there is no mention about what this could relate to in the discussion.

Appendix 11.6: Geoarchaeological monitoring of Ground Investigation Works

- 3.36 This appendix is composed of four reports for geoarchaeological investigations across key valley sections: the River Waveney Valley, the River Stour Valley, and North Tilbury.

- 3.37 The GI interventions have identified deposits of archaeological, geoarchaeological and palaeoenvironmental potential, but the spacings between interventions has limited the resolution of the assessment. This points to where additional work will be required to fill in the gaps in our understanding.
- 3.38 It was noted in the reports that some samples were recovered, but no information has been included about whether the samples have been assessed. The samples would provide information about the potential and significance of a sampled unit, which in turn would help inform the mitigation strategy. We feel that this is a missed opportunity and would recommend that they are processed as soon as possible in order to inform the construction design and the mitigation programmes in those locations.

River Waveney Valley report:

- 3.39 This report presents the results of the geoarchaeological monitoring of the GI works conducted in the River Waveney valley crossing area.
- 3.40 2.1.1 states that a total of 24 geotechnical pits and 21 boreholes were investigated for GI works, but with 7 geotechnical pits and 12 boreholes identified as having geoarchaeological potential.
- 3.41 The summary of the superficial geology has outlined a number of deposits that has archaeological potential. This includes the Hoxnian Stage interglacial Lacustrine Deposits that are preserved on the valley sides (Section 4.2.8). It is noted that the sequence at nearby Hoxne is of national archaeological importance because of the abundant palaeoenvironmental evidence and the rich Palaeolithic archaeological record. This indicates that these deposits will need to be considered carefully as remains of national archaeological importance may be present.
- 3.42 Peatlands and peat deposits have been recorded in the River Waveney and its floodplain (Section 4.2.11 and 4.2.12), which are generally considered to be of high or very high archaeological and palaeoenvironmental potential. Peat forms in waterlogged conditions and can result in anaerobic conditions that can preserve organic archaeological remains (e.g. wooden structures, leather artefacts etc.) and environmental remains.
- 3.43 7.3.4 states that grab samples were recovered from the boreholes for geoarchaeological and palaeoenvironmental interest. It is not stated how these samples were recovered (i.e. were the boreholes subsampled in the field or were samples recovered from the arisings?), which could impact the risks of contamination of the sampled material, and if the sampled material had been disturbed.
- 3.44 Table 7-2 summarises the samples that were collected but it would be useful to state what deposit was sampled (e.g. peat).

- 3.45 Table 8-3 summarises the thickness of the stratigraphic units, but some of the table headings have been redacted, making the table unreadable.
- 3.46 The results of the geoarchaeological monitoring have been presented as Transects (Illus 3 and 4), which demonstrates the complexity of the sampled sequences. It is noted that the confidence in the resulting deposit modelling was moderate as there was potential for undiscovered, discontinuous deposits of interest to be present between the borehole locations (Section 8.4.1).
- 3.47 9.2.6 states that the soft dark brown fine sandy silty clay recorded in borehole MM_RG_BH_106 has high potential to be interglacial deposits of Hoxnian age. The deposit could therefore date to a period where hominids were known to have been present within the wider environment. It has been previously stated that these deposits could be of high archaeological and palaeoenvironmental potential. The assessment of the palaeoenvironmental information from these deposits would therefore contribute to addressing research questions.
- 3.48 It is good to see that the potential of the likely Lodge Farm Clay and Silt Member deposits has been discussed, as well as the information that these deposits may be able to add to our understanding of Palaeolithic environments (Section 9.3.2).
- 3.49 The geoarchaeological assessment has identified peat in a number of the interventions within the hollows in the river terraces in the uppermost part of the sequences (Section 9.4.1). The palaeoenvironmental value of the peat and alluvial sequences is recognised, which is good to see, but assessing the palaeoenvironmental potential of these units would have helped to guide the mitigation strategy moving forwards.
- 3.50 The potential presence of tufa within MM_RG_IP_103 is noted (Section 9.4.3), which has the potential to provide valuable information about past climates.
- 3.51 A number of recommendations have been made for additional work, which includes the assessment of all future GI data by a geoarchaeologist (Section 11.1.2). We would recommend that a geoarchaeologist has direct access to GI cores, as it is better to record and assess continuous core sequences rather than isolated deposits or logs as this allows for greater reliability and confidence in the resulting conclusions.
- 3.52 We would also recommend that samples are recovered from GI cores where possible to maximise the opportunities to recover information, whilst minimising the duplication of effort.
- 3.53 Recommendations have been made for fieldwork and sampling, which includes sampling peat sequences (Section 11.2.1), the tufa (Section 11.2.2), the potential interglacial deposits (Section 11.2.3) and the potential Lodge Farm Silt and Clay lacustrine deposits (Section 11.2.4). We agree that further work needs to focus on collecting high-resolution data and recovering secure samples for dating,

palaeohydrology and for reconstructing past climate and environments (Section 11.2.5).

- 3.54 Appendix 1 presents the data from the geoarchaeological logs. It is noted that samples were recovered, but there is no information about if the samples were assessed as part of this work. This information would provide information about the potential and significance of a sampled unit, which in turn would help inform the mitigation strategy.

River Stour Valley Crossing report:

- 3.55 2.1 states that the GI works for the Stour Valley Crossing included 19 interventions, of which 16 were geoarchaeologically monitored: ten cable percussion boreholes and six trial pits.
- 3.56 The summary of the superficial geology has outlined a number of deposits that has archaeological potential. This includes the Kesgrave Catchment Subgroup sands and gravels, the lacustrine 'Marks Tey'-style clay and silt deposits, the River Terrace deposits, and the peat and alluvium (Table 4.1).
- 3.57 7.3.4 states that grab samples were recovered from the boreholes for geoarchaeological and palaeoenvironmental interest. It is not stated how these samples were recovered (i.e. were the boreholes subsampled in the field or were samples recovered from the arisings?). This information is needed as to indicate if the samples may have suffered from contamination or and if the sampled material had been disturbed
- 3.58 8.2.9 states that peat and organic alluvium were recorded in several boreholes. Peat is classed as being of high archaeological and palaeoenvironmental potential and should be investigated further (Section 9.6).
- 3.59 It is stated that the confidence in the deposit modelling produced for this study is moderate (Section 8.3.2). It was noted that the method of investigation (cable percussion boreholes using disturbed samples) means that some of the identified units could not be confidently differentiated (Section 10.3). This points to where additional investigation will be required in the next phase of works on site...
- 3.60 It is stated in Section 10.2 that mitigation should focus upon capturing stratigraphic sections that are suitable for differentiating the complex sequence of gravels and potential lake deposits, which seems sensible and appropriate. The sequences recorded in this report could potentially produce high resolution records of landscape and environmental change over time.
- 3.61 Section 10.4 states that stepped trenches may be needed to allow specialists safe entry to investigate deposits once the depth exceeds 1 m. We agree that this would be useful for key sequences and to allow specialist samples to be recovered for palaeoenvironmental and dating assessments.

- 3.62 Section 10.6 outlines the further sampling priorities for future work. It is stated that alluvium deposits are of low geoarchaeological potential but have the potential to contain deposits of moderate to high geoarchaeological and palaeoenvironmental significance. It is therefore not clear why it is stated that targeted mitigation of these deposits is not suggested. We recommend this is rectified in any proposal going forward.
- 3.63 Section 10.6 states that organic alluvium is of low to moderate geoarchaeological potential but will only be targeted for further work if they are believed to date to associated archaeology, for which the environmental context would be useful. Can it be clarified how the date of the deposits will be determined? No assessment work has been carried out on any of the geoarchaeological work carried out prior to submission, and so no scientific dating work has been completed to guide these discussions. This is a concern.
- 3.64 It is stated that peat deposits will be targeted for further assessment using window samples for palaeoenvironmental and scientific dating, which is good to see.
- 3.65 It is stated that a targeted programme of OSL dating has been recommended for sands and gravels associated with the River Terrace Deposits during mitigation works. We would recommend that the value of portable OSL (pOSL) is considered for these deposits to help inform the sampling strategy on site.
- 3.66 We are pleased to see that the potential of the glaciolacustrine deposits has been recognised and that the proposed mitigation work will investigate these deposits in more detail (additional geophysical surveys, borehole samples, dating, palaeoenvironmental assessments and sedaDNA).
- 3.67 It is recommended that a geoarchaeologist monitors any subsequent GI works, which we would support. This will allow opportunities to record and sample deposits to be maximised where possible.
- 3.68 Appendix 1 presents the data from the geoarchaeological logs, which includes information about the finds and samples that were recovered. It is not clear what type of samples were recovered, just where the samples were recovered from. There is also no information about whether the samples were assessed as part of this work. This information would provide information about the potential and significance of a sampled unit, which in turn would help inform the mitigation strategy.

North Tilbury report

- 3.69 2.21 states that a total of 22 interventions were investigated for the GI works, with 19 designated for geoarchaeological monitoring: four cable percussion boreholes, eight trial pits, one infiltration pit and six inspection pits for CPT testing.
- 3.70 Table 8.2 summarises the trial pit locations and the depths reached for each intervention. The maximum depth reached by the trial pits was 3 m below ground

level (bgl), with six trial pits only investigating up to 1.2 m bgl. The final design of the proposed development is not currently available, and so it is not clear how deep the impacts may be in the different areas of the proposed scheme. However, it is likely that additional studies will be needed in this area to understand the impacts of the proposed scheme.

- 3.71 8.6.2 states that the confidence in the deposit model produced for the North Tilbury study area was classed as good, as there is a relatively high density of boreholes and test pits.
- 3.72 It is noted that several of the sequences logged by the geoarchaeologist were only available as disturbed bulk samples, which limits the information available as details about the stratigraphy and transitions between layers has been lost (Section 8.6.3).
- 3.73 The issues associated with identifying key deposit types, such as the palaeosols has been highlighted, stating that this will need to be addressed during the future works (Section 8.6.4).
- 3.74 Recommendations have been made for further mitigation work in Section 10.2. It is stated that Head deposits are of low geoarchaeological potential but have the potential to contain deposits of high geoarchaeological and palaeoenvironmental significance, such as buried land surfaces and palaeolithic remains. It is therefore not clear why it is stated that targeted mitigation of these deposits is not suggested.
- 3.75 We are pleased to see that a targeted borehole survey will be carried out to investigate the buried land surfaces in more detail.
- 3.76 10.3 states that a targeted programme of OSL dating has been recommended for sands and gravels recorded during monitoring. We would recommend that the value of portable OSL (pOSL) is considered for these deposits to help inform the sampling strategy on site.
- 3.77 Appendix 1 presents the data from the geoarchaeological recording, including the finds and samples that were recovered. No samples are recorded which seems to be a missed opportunity to understand the potential of the sampled deposits, and to guide the mitigation strategy.

Watching brief Report

- 3.78 This report presents the results of archaeological and geoarchaeological monitoring of 54 geotechnical pits across three geographical sections of the route: Section B (Mid Suffolk District Council), Section C (Babergh District Council, Colchester City Council and Tendring Council) and Section D (Colchester City council). This part of the route covered approximately 87 km in length (Section 1.1), and a total of 43 pits were excavated under archaeological supervision (Section 2.1).

- 3.79 The results section does not really discuss the geoarchaeological potential of the test pits and it does not appear that any samples were recovered to help understand the palaeoenvironmental potential of the sampled deposits, which we feel is a missed opportunity. It was also not clear if the test pits were monitored by a geoarchaeologist.

4 Comments on Outline Archaeological Mitigation Strategy and the Outline Written Scheme of Investigation (OAMS-OWSI), (Vol 7: Other Documents, Document 7.5), the OLEMP (Document: 7.2), the CoCP (Document: 7.2) and the Draft DCO (Vol 3, Draft Development Consent Order, Document: 3.3)

OAMS/OWSI

- 4.1 1.3.4 states that appropriate and proportionate geophysical (magnetometer) survey and archaeological trial trenching has been undertaken to date, but we do not feel that this statement is correct. It was stated in the Chapter 11 of the main Environmental Statement that part of the geophysical survey work has not been completed (10% of the Phase 1 Priority areas and 50% of the Phase 2 areas), and that the Trial Trench evaluation excavations are also outstanding (85% of the Priority areas and 100% of the Phase 2 areas).
- 4.2 In addition, the Geophysics and Trial Trench evaluation reports included in Appendices 11.4 and 11.5 respectively are stated to be interim reports only. They do not represent the full assessment of the results, and they do not include the specialist assessment of things like the artefacts or samples. Referring to these documents as ‘the results of the evaluation fieldwork’ for example (Section 1.8.1) is misleading.
- 4.3 The result of the geophysical survey and Trial Trench evaluation excavation are needed to understand the potential of the proposed development area as well as the potential impact of the different elements of the scheme. A significant amount of information is therefore not available for review to support the application.
- 4.4 It is stated in Section 1.3.4 that only limited additional archaeological evaluation will be carried out post-consent, but as stated above, the majority of the Phase 1 and all of the Phase 2 evaluation work has either not been completed or not started at the point of submission.
- 4.5 It is stated that the OAMS-OWSI describes the mitigation that could be undertaken. Due to the lack of evaluation data available for review, this document will need to allow for a degree of flexibility post-consent to ensure that opportunities to investigate features and deposits are not missed, and will need to be updated regularly.
- 4.6 Table 2.1 outlines the aims of the mitigation techniques proposed for the project. In general, the approaches summarised in this table are what we would expect to see. However, we would recommend that mitigation approach 1.2 (discussed further in Sections 5.3.6-5.3.11), which proposes the burial or sealing of remains within barrier membrane’ is reviewed. The Historic England document ‘Preserving Archaeological Remains’ (2016), and in particular, Appendix 5, ‘The Reburial of Archaeological Sites’ (2024) should be referred to, to help define a reburial scheme for the archaeological site: <https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>.

- 4.7 The 'Reburial of Archaeological Sites' document states that the use of geosynthetic membranes needs to be justified. It is further stated that they are not usually required and can at times cause damage to the assets that they are installed to protect. We would therefore recommend that the potential use of geosynthetics as a barrier membrane is reconsidered and justified.
- 4.8 The 'Reburial of Archaeological Sites' document helps to define a reburial scheme for an archaeological site that considers the significance of the remains, its condition and an assessment of the impacts and risks facing the site. We would recommend that this document is referred to and the 'Reburial Checklist' and 'Reburial Threats and Risks' documents are completed. This would ensure that the reburial strategy is appropriate for the site and for the remains in question.
- 4.9 5.1.1 states that the DWSI's will be approved by the relevant Local Planning Authority, and if relevant, Historic England. We would recommend that the DWSI's are shared with Historic England, particularly the Science Advisor who can review aspects such as the sampling strategies.
- 4.10 5.1.12 and 5.3.138 state that no construction will take place on site if unexpected remains are discovered until a suitable approach has been agreed with the Local Planning Authority and Historic England. It should be noted that if waterlogged structures, remains and deposits are discovered, the size of the stand-down area required will need to be considered as the construction work could result in the dewatering of adjacent areas. This could impact the archaeology and result in its degradation and loss.
- 4.11 5.3.23 states the type of samples that will be collected for geoarchaeological analysis. This includes analysis of chemistry, magnetic susceptibility, particle size, micromorphology and/or other techniques as appropriate. The list of analysis does not mention palaeoenvironmental assessments, but it is stated in Section 5.3.24 that the potential for palaeoenvironmental evidence will be considered.
- 4.12 We are pleased to see it stated that samples of waterlogged deposits should be retrieved for assessment of the preservation potential of environmental remains (Section 5.3.24).
- 4.13 5.3.40 states that all evaluation necessary for the purposes of the ES was completed, but we do not agree with this statement. The Geophysics reports in Appendix 11.4 and the Trial Trench evaluation reports presented in Appendix 11.5 are interim reports only and significant portions of the evaluation work is still outstanding. Specialist assessment of the artefacts and environmental samples has not been carried out/completed and so the potential, condition and significance cannot be confidently determined at this stage.
- 4.14 5.3.50 & 5.3.86 state that artefact and environmental sample processing will be undertaken whilst the investigation proceeds on site, which is good to see. This information can be fed-back to the team on site to inform and guide the strategy.

- 4.15 5.3.51 states that if waterlogged deposits are identified, the Conservation specialist and the Environmental Archaeology Coordinator or Environmental Archaeology Supervisor will be contacted for advice, which is good to see. In addition, advice will be sought from the Historic England Science Advisor and relevant Local Planning Authority, which is also good to see.
- 4.16 5.3.69 and 5.3.72 state that hearths and areas of burning will be completed excavated and sampled for techniques such as archaeomagnetic dating. We would recommend that it is made clear that an archaeomagnetic dating specialist will need to assess the potential of a feature for dating before it is excavated, as this technique requires samples to be recovered from areas of in situ burning.
- 4.17 It should be noted that some of the features and remains will require a specific sampling strategy to be developed (e.g. structures, industrial features etc). The strategies will need to be included in the DWSIs.
- 4.18 5.3.84 states that the environmental sampling strategy for each DWSI will be based upon the results of previous assessment work, but with the exception of the EACN evaluation excavations, environmental samples have not been assessed yet.
- 4.19 5.3.85, 5.3.93 and 5.3.124 state that the Historic England document 'Environmental Archaeology' will be referred to, but it should be noted that a revised version of this document was published in 2025: <https://historicengland.org.uk/images-books/publications/environmental-archaeology-3rd/>.
- 4.20 5.3.88 outlines the sort of remains that will be assessed as part of the investigations. Details of the types of samples that will be recovered will need to be included in the subsequent DWSI, include the size of the samples required to produce statistically reliable assessments.
- 4.21 We are pleased to see that scientific approaches will be considered to address specific research questions, such as biomolecular approaches (Section 5.3.91).
- 4.22 We are pleased to see that statistical modelling of the scientific data will be carried out in order to produce robust chronologies. It is stated that the different dating specialists will prepare a strategy prior to the commencements of the works, which will be incorporated in to the DWSIs (Section 5.3.92).
- 4.23 It is stated that scientific dating will be undertaken at the post-excavation stage (Section 5.3.92) but it should be noted that for some techniques, samples will need to be recovered during the fieldwork phase (e.g. archaeomagnetic dating, OSL etc.).

Code of Construction Practice (Document 6.1.13 ES Chapter 11: Historic Environment - document reference 6.11)

- 4.24 Historic England notes the application contains heritage specific policies within the CoCP (Document 6.1.13 ES Chapter 11: Historic Environment - document reference 6.11). We welcome the recognition that the project could affect the historic environment during construction, including archaeological remains, built heritage and historic landscape assets. We welcome the mitigation measures and commitments (Table 6.1).
- 4.25 We also welcome the provision of an Outline Archaeological Mitigation Strategy (OAMS) and Written Scheme of Investigation (WSI). As noted above the AMS and WSI would however need to be revised in line with our comments prior to being issued and should consent be granted. We would welcome further discussions post consent with regards to finalising the documents and as part of the approval process as a named party.
- 4.26 Given the documented issues with regards to the amount of assessment work that is still to be undertaken we would recommend that the applicant seek the appointment of an Archaeological Clerk of Works in the event that consent is granted. This role would be responsible for the commitments as set out in the CoCP and would oversee the transition from evaluation to mitigation, and the implementation of the AMS and the WSI. The use of a role such as a clerk of works should be added as a specific agreement in the CoCP and could be added to the CoCP as a commitment and again in Table 6.1.
- 4.27 Commitment H04 (Table 6.1) should also include reference to Historic England, and we recommend the wording is changed to
- 'Where a previously unknown heritage asset has been discovered, or a known heritage asset has proven to be more significant than foreseen at the time of application, the Project will inform the LPA and Historic England and agree a solution that protects the significance of the new discovery, through preservation or excavation and recording, whichever is practicable within the Project construction requirements.'*
- 4.28 We note the CoCP also includes Hydrology, Land Drainage and Flood Risk (6.1.15 ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) which considers the potential effects of the proposal on hydrology, land drainage and flood risk, including surface water receptors. Please note that this could include effects on archaeological sites such as those which retain water (e.g. moats) as well as other archaeological deposits. Regard should be given to archaeology within this mitigation and cross referenced to the archaeological section and again during the detailed design stage. A commitment should be given in Table 6.1 to include identification of archaeological features with sensitivity to hydrological changes
- 4.29 We accept the restrictions placed on those pylons relating to Langleys' and have included this in our assessment of the impact resulting from the operation of the project in our representations.

Volume 7, document 7.4 Outline Landscape and Ecological Management Plan

- 4.30 We are content with the proposals as they relate to designated heritage assess. Sections 7, Vegetation Retention and Protection and 9, Landscape and Ecological Reinstatement and Other Mitigation set out approaches to the retention, reinstatement and post-construction management of trees and hedgerows which could be positive in the setting of heritage assets, particularly where the proposed development is distant from them and this might contribute to screening part of the development
- 4.31 HE welcomes proposals for planting in the setting of designated heritage assets and that we have brought these into our assessment of the permanent, operational impact of the development

DCO (Volume 3: Draft Development Consent Order Document: 3.3 Draft DCO - Validation Report for DCO Final Issue A, August 2025)

- 4.32 We appreciate being a named party within the DCO wording at **SCHEDULE 3 REQUIREMENTS 5. Archaeology (pp 105)**.
- 4.33 We consider that the requirement wording is however imprecise and would need to be amended. At present the conditions say the following

(1) No stage of the authorised development may commence until either a preservation in situ management plan, or a detailed written scheme of investigation of areas of archaeological interest relevant to that stage (if any), as identified within the outline archaeological mitigation strategy and outline written scheme of investigation or identified through evaluation work as set out in the 107 outline archaeological mitigation strategy and outline written scheme of investigation, has been submitted to and approved by the relevant planning authority and, if relevant, Historic England.

(2) Any detailed archaeological works must be carried out in accordance with the approved detailed written scheme of investigation for that stage.

(3) The detailed written scheme of investigation must be substantially in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation and must identify areas where archaeological works are required and the measures to be taken to protect, record or preserve any significant archaeological remains that may be found and must include—

- (a) an assessment of significance and research questions.*
- (b) the programme and methodology of site investigation and reporting.*
- (c) the programme for post-investigation assessment.*
- (d) proposals for providing for the analysis of site investigation and recording.*

(e) proposals for providing archive deposition of the analysis and records of the site investigation.

(f) nomination of a competent person or persons/organisation to undertake the works set out within the detailed written scheme of investigation; and (g) an implementation timetable.

(4) For the avoidance of doubt, all pre-commencement operations must be carried out in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation, unless otherwise agreed with the relevant planning authority and, if relevant, Historic England.

- 4.34 We would recommend the wording at sections (1) and (4) 'and, if relevant' is deleted and replace with 'in consultation with'. This is because Historic England would not be an 'approving' authority in this instance as this is a role for the LPA. 'In consultation' would instead enable HE to be informed of the proposal and provide comment as appropriate to the LPA, to support the LPAs in decision making.

5 Policy considerations

- 5.1 We note the applicant has set out some of the relevant policy contexts for the historic environment at 11.2 of Environmental Statement (Chapter 11- Historic Environment Document: 6.11). We are aware that Regard to the Historic environment is considered in both the Horlock Rules and National Policy Statement for Electricity Networks Infrastructure (EN-5), 2025. The Horlock rules state for example that

'Internationally and nationally designated areas of highest amenity, cultural or scientific value are: National Parks; National Landscapes; Heritage Coasts; World Heritage Sites; Ramsar Sites; Sites of Special Scientific Interest; National Nature Reserves; Special Protection Areas; Special Areas of Conservation. Care should be taken in relation to all historic sites with statutory protection e.g. Scheduled Monuments, Battlefields and Listed Buildings.'

- 5.2 EN 5 at 2.2.10 goes on to say that 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."

This sets out the commitment by which the applicant would need to consider the and address historic environment matters within the application.

- 5.3 EN-5 as an overarching policy refers for further guidance on Historic Environment to the specific policies set out in Overarching National Policy Statement for Energy (EN-1), 2025, and specifically Section 5.9. Historic Environment. This mirrors the NPPF and specially includes general historic environment paragraphs as well as sections that cover Applicant Assessment, Mitigation and the role of the Secretary of State in decision making. We have not flagged every policy however we would like to draw attention to the following.
- 5.4 EN 1 5.9.26 which says the

'...Secretary of State should consider the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution that their conservation can make to sustainable communities, including to their quality of life, their economic vitality, and to the public's enjoyment of these assets.'

5.5 EN 1 para 5.9.29 which states that

'...The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.'

5.6 EN 1 para 5.9.32 also states that '*...Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use.'*

5.7 Again para 5.9.34 notes that in weighing applications that directly or indirectly affecting 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.

5.8 And para 5.9.37

'When considering applications for development affecting the setting of a designated heritage asset, the Secretary of State should give appropriate weight to the desirability of preserving the setting of such assets and treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the Secretary of State should give great weight to any negative effects, when weighing them against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval'

5.9 Also, of relevance here and not considered by the applicant in 11.2 would be EN 1 para 5.9.8 which states that

'...non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments or Protected Wreck Sites should be considered subject to the policies for designated heritage asset. The absence of designation for such heritage assets does not indicate lower significance or necessarily imply that it is not of national importance.'

5.10 And again 5.9.15 The applicant is encouraged, where opportunities exist, to prepare proposals which can make a '*positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected*'.

6 Historic England Written Representation: Conclusions

- 6.1 We want to confirm at the outset that Historic England does not object in principle to the Proposed Development. We have however raised some concerns with the application in the text above that we feel would benefit from further scrutiny. We have also concluded that a large range of designated and non-designated heritage assets would be negatively impacted by the development. Some direct, permanent and harmful changes would result from the development, and these changes may result in a significant effect in some cases. These impacts will need to be weighed in the balance in relation to the decision making.
- 6.2 Mitigation and approaches to mitigation are discussed (see Chapter 11.6) and this has included detailed discussion and analysis to inform the routeing and siting of the new infrastructure, the proposals to underground cables in key areas and changes in the type of pylons, in order to reduce visibility and skyline effects. A number of historic environment assets including the highly valuable castle and church complex at Little Wenham, Langleys Park, and the Waltham's conservation areas have benefited from this approach, and we confirm our view that the effects of the scheme here have been reduced through these measures.
- 6.3 We are also aware however that the proposed undergrounding at the Waveney Valley is not now in the proposed scheme. This would have reduced the effects of the proposal on the highly graded and designated Church at Roydon (see text above). The option to revert to overhead cables in this location does therefore represent historic environment harm. Alternative routes have been discussed however the preferred option would result in a significant effect to the church at Roydon. One of the pylon bases will also have a very negative impact on the significance of the non-designated heritage asset known as Bush Hall.
- 6.4 We have considered both cases and in our view the applicant's assessment is not correct in relation to both these cases and mitigation of effects through design has not been rigorously applied. We accept that it may not be possible to apply further mitigation in this location and that undergrounding has been discounted, but it is clear that the preferred approach will represent harm in policy terms and a likely residual effect. We recommend the applicant reconsider their assessment of the significance of these assets and the magnitude of the impact and we would welcome further engagement with regards to options for mitigation on Roydon Church and the moated site Bush Hall. We would also recommend the ExA consider what additional mitigation could be applied here.
- 6.5 In relation to the Dedham Vale National Landscape, we note the approach to underground a major section of cables through this area will reduce effects on the National Landscape, its setting and on the setting of heritage assets located within the National Landscape. We also agree with the applicant in that this approach is also likely to increase impacts on non-designated heritage assets throughout the cable route, and in particular for buried archaeology.

- 6.6 We would therefore like to stress a concern with regards to the dense areas of non-designated archaeology that survive on both sides of the river Stour as we have set out above. What is represented in these areas are two dense multi-period settlements which have a high overall value in terms of evidential value and period representation. Impacts are unavoidable and in particular the impact of the drill pits and works compounds needed to direct rill cables beneath the river. These are critical areas for the construction programme and mitigation will need to be carefully applied in these locations and the programming and timeliness of any excavations will need to be factored into the project programme. We are seeking reassurance from the applicant that this has been considered and there is a contingency allowed for expected high value discoveries.
- 6.7 We also have a concern about the undergrounding works across the Stour at this location. As set out above limited assessment has taken place on those deposits it and therefore this work needs to be undertaken as soon as possible with the programme. A full assessment of the archaeological and palaeoenvironmental potential of the deposits is needed in order to understand the impacts upon them and in order to address construction questions and in order to inform an approach to mitigation. In essence drilling through peats and other valuable environmental deposits would represent an impact on the historic environment, possible heritage harm in policy terms and a potential project risk that can be mitigated by further assessment and informed construction design provided it is undertaken early enough.
- 6.8 Although we are broadly content with the overall approach to the assessment and evaluation, we are very aware the applicant has not completed as much field work at this stage as would have been anticipated for a project of this magnitude and scale. The applicant has acknowledged that the evaluation and assessment, particularly of non-designated heritage assets and archaeological sites is incomplete and is ongoing as we approach the examination. It is unlikely that this will be sufficiently completed by the end of the examination to provide a complete assessment. This is acknowledged as a project risk.
- 6.9 Historic England understand the applicants position; however, it is important to recognise that many of the reports provided at examination must be considered as interim at this time (see above) and the initial values ascribed to non-designated heritage assets and archaeological sites in the Baseline and Assessment reports are in many cases partial and incomplete. The assessment of significance for some assets is on going and has not been tested by field work. Many reports remain as interim statements. The application therefore only partially address the policies as set out in EN-1 in relation to the applicant's assessment.
- 6.10 There is therefore a potential that the applicant may yet identify high value archaeological sites or those that have a potential equivalence in policy terms to a designated heritage asset (as referred to in EN 1 para 5.9.8). And where the impact upon this asset would result in a high degree of harm or a significant effect in EIA terms, requiring mitigation. Robust policies and procedures therefore need to be in place to cover this contingency and be sufficiently detailed to ensure that

appropriate mitigation can be applied to unexpected and unusual finds including preservation in-situ. This would also include robust policies to cover river valleys, wet preserved deposits and well-preserved organic material such as we have noted above in relation to the Stour valley. The ExA would however need to be reassured that this work can be undertaken appropriately, to the required standards and in sufficient time as not to delay the construction. This would be to ensure balance of harm and benefit can be appropriately weighed as set out in the policies in EN 1 that relate to decision making for the SoS.

- 6.11 We also recommend that the assessments and proposed mitigation documents are amended as appropriate to reflect new information or updated assessment of significance. This will need to be provided as an addendum or through tracked changes.
- 6.12 We are however broadly in agreement with the applicant's assessment with regards to the majority of the highly designated heritage assets, that we have assessed and fall within our remit. We have provided a narrative in relation to a number of assets where we feel it would be helpful to confirm the baseline assessment or where our assessment may challenge aspects of the approach taken.
- 6.13 We have made some recommendations particularly in relation to things like the wording of the DCO, the CoCP, WSI and OAMS that we feel would help provide rigour in the event that the DCO is granted. We recommend these changes are implemented before the end of the examination.
- 6.14 The ExA would however need to confirm that the information provided is sufficient to address the policies set out in EN 1 for the applicant assessment and that there are sufficient safeguards set out with the DCO and accompanying policies to ensure heritage matters can be managed in a manner that is appropriate to their significance. Likewise, that the Secretary of State has sufficient detail on the significance of heritage assets to address the balancing required in the EN 1 and 5.9.32 and 5.9.33.
- 6.15 As is set out in EN 1 Para 5.9.33 we are aware it is for the SoS to weigh the balance in relation to the harm and benefit. The ExA would therefore need to be content that the benefits of the proposal would outweigh the harm and that the impact can be justified in terms of those tests set out in EN 1. Likewise, the Secretary of State would also need to have regard to policies 5.9.28, 5.9.29, 5.9.33, and 5.9.37 in the decision-making process. This is specifically with regards to the impact of the scheme upon the significance of the designated heritage where their settings are affected.
- 6.16 We do not consider 5.9.26 has however been appropriately addressed in the application in particular the section that relates to the 'the desirability of sustaining and...enhancing the significance of heritage assets...'. Whilst we appreciate mitigation other than through design changes is challenging, we consider more could be done by the applicant to consider the communities with affected heritage

assets and how the applicant can foster and support community led approaches to heritage.

Historic England's Norwich to Tilbury Consents Team 08th February 2026