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The applicant

Our Ref: EN020027

Date: 7 May 2026

Dear Mr Pepper

The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 17

Application by National Grid Electricity Transmission for an order granting development consent for the Norwich to Tilbury project

Request for further information relating to the historic environment

This letter is written under rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010.

The Examining Authority (ExA) requests answers to the following questions relating to the item 9 historic environment (above ground assets) that it was unable to cover at Issue Specific Hearing 2 at the session on Wednesday 29 April 2026. All questions are to the applicant.

Methodology

1. The ExA's first written questions (ExQ1) HE 1.8 [\[PD-014\]](#) concerned the weighting to be given to harm to multiple assets. The ExA notes your answer stating that it is not appropriate or lawful to add up less than substantial harms to multiple heritage assets incrementally, but how do you suggest less than substantial harm is dealt with given the need to give considerable weight to each incidence of heritage harm?
2. In your answer to ExQ1 HE 1.7 [\[PD-014\]](#), it is inferred that the differences between lower and mid less than substantial harm depends to a large extent on screening. Screening can be transitional and change with time, therefore how may this affect assessments on levels of harm?
3. The Historic England Good Practice Advice note 3, 'The Setting of Heritage Assets', states that although views of or from an asset will play an important part in assessment, the way in which we experience an asset in its setting is also influenced

by other environmental factors and also by our understanding of the historic relationship between places.

Within Environmental Statement (ES) Appendix 11.2 [AS-070], the assessment of construction effects considers noise, dust, vibration as well as visual impacts whereas the assessments for operation and maintenance focus almost entirely on intervisibility and views and take little account of deeper historic relationships, and therefore the wider experience of the asset that may be affected. What is your justification for this?

4. ES appendix 11.1 [APP-209] provides detail on historic character and historic landscape characterisation, but several interested parties have pointed out that the assessments have not appreciated this historic relationship. For example, the buildings in a group have been treated as three separate listed buildings, whereas the site's importance is greater than the sum of its parts.

In response to ExQ1 HE 1.8 [REP3-074] you allude to your approach in your example of Raydon Hall where you state that while the interrelationships between the various assets in the group were deemed to be a prominent factor in determining that the shared setting of the assets made a considerable contribution to both the individual assets as well as the group, the conclusion of the assessment was not given greater weight because of the group dynamic. This appears to disregard the statement that a site may be more important than the sum of its parts.

Can you explain how you approached the assessment of groups of listed structures that will help the ExA understand how you have applied the Historic England guidance on the assessment of setting?

5. With reference to vibration effects, ExQ1 HE1.11 [REP3-074] is noted, however listed buildings often have softer mortar, simple or no footings and poor cross bracing, resulting in a higher susceptibility to vibration.

The table indicates 33 out of nearly 650 listed buildings are deemed to be subject to a greater than negligible magnitude of impact from vibration without mitigation, with only 3 buildings considered to be subject to a large impact.

Commitment H07 in the outline code of construction practice (CoCP) [REP3-025] states that commitment NV04 will be applied in relation to any designated historic buildings with potential to be impacted by construction vibration. How will this commitment be applied across the proposed development if only 3 structures have been assessed as having the potential to be impacted by construction vibration?

6. Various relevant representations raise concerns that various heritage structures have the potential to be affected by vibration. How will these be covered under NV04, and what determines if a building or structure is "deemed particularly sensitive to vibration" and what would the "lower level" be?

General issues, including limits of deviation and approach to non-designated heritage assets (NDHA)

7. Your answer to ExQ1 HE1.10 [REP3-074] states that as the assessment of whether change within the limits of deviation (LoD) would alter the conclusions of the historic environment assessment considered the reasonable worst case scenario and

concluded either less than substantial harm or no harm to designated heritage assets, there is no requirement to further reduce the LoD. However, restricting the LoD in areas within the setting of heritage assets could only be beneficial. What is the benefit of leaving the LoD in the majority of cases as it is?

8. ExQ1 HE1.39 [PD-014], asked all Essex local authorities to provide further evidence relating to protected lanes and whether they should be considered NDHA. Numerous local authorities responded positively to this question, outlining the lanes that were considered Protected Lanes, and the policy background that supports their consideration as NDHA.

Commitment H06 in the outline CoCP [REP3-025] provides for pre-commencement survey work to be carried out on the lanes identified, and for construction activities to be limited and monitored, including reinstatement of any disturbed features. Whilst several lanes have been identified in ES appendix 11.1 [AS-070] it could be said that these have not been properly assessed in the NDHA sections of this report and this does therefore not constitute assessment as required by NPS-EN1 paragraph 5.9.9, or a balanced judgement as required by paragraph 5.9.33.

Comment further on your assessment of protected lanes, and why these have not been assessed in line with other NDHAs?

Specific heritage assets, including NDHA

Written questions were asked about individual assets at ExQ1 and further written questions may follow at ExQ2 following further consideration and site visits.

Mitigation

9. How can it be demonstrated that avoidance, as the primary tool of mitigation hierarchy, has been applied when there are still a considerable number of outstanding concerns from local authorities and other interested parties regarding the historic environment? These concerns relate principally to the impacts of the proposed development on the setting of important heritage assets, and are not restricted to visual impacts.

The applicant is asked to respond to these questions at **deadline 4 (Tuesday 12 May 2026)**. Other parties can respond to such answers if they wish at deadline 5 (**10 June 2026**).

Yours sincerely

Susan Hunt

Lead member of the panel of Examining Inspectors

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