

During the application process we have been designated as a Land Owner, as such we were afforded a meeting with NG representatives Fischer German. As part of these meetings with two representatives from Fisher German they attended our property on two occasions. The discussions covered the proposed routes, heritage status and mitigations. Fischer German took minutes of the meetings and were requested to provide copies of the minutes which they have not provided, they were contacted on several occasions and requested to provide minutes which have refused.

As part of our discussion the change in the route of the pylons was discussed, any details to justify the change in route was not provided any discussions relating to mitigation were rejected, and were advised any future changes would not occur and the current route was fixed.

In reference to the electricity act 1989 and the application of EN-1 and EN-5 the Historic Environmental Baseline Report failed to recognise Bleak Hall as historic asset initially, it was listed in 1986 as a Grade ii building with the listing entry of 1251669.

We understand that in the initial phases of planning an objection from an equestrian facility resulted in the route being changed to impact Bleak Hall, pylons RG197 - RG200, we understand that as stated in the NG core document CD-5 "That any enhancements should not result in any other significant adverse impact". The current route may have reduced the impact on an equestrian facility but has an adverse impact on our property and heritage asset which conflicts with EN-1 that details how outlines how historic buildings, must be assessed and protected.

During meetings with Fischer German the detail of the objection was not made aware to us, it should be noted that Bleak Hall also may be classified as an equestrian facility, as we have both stables and horses on site, again this has been overlooked to our detriment.

In reviewing the information available, the requirements detailed in EN-1 / EN-5 have been ignored in that the HEBR had initially failed to recognise Bleak Hall as a Heritage Asset, the objection raised has resulted in the route being altered to impact Bleak Hall.

The assessments of assets as detailed in the Planning inspection report EN020027, section 11.2.6 fails to recognise the environmental impact also applies to Grade ii properties as well as Grade ii\*. This requirement is detailed in NPS EN-1 (DESNZ, 2024a) section 5.9.30.

The planning report indicates mitigation should be considered we are not aware of any indicated or planned mitigation, we would request mitigation should consider under grounding using HVDC and cable ploughing.

We wholly support the report submitted by [REDACTED] and the harm to Heritage assets and the pylons should not pass close to us.

## **Historic Environment submission, Deadline 4, for Pylons East Anglia.**

Hello, [REDACTED], Heritage Consultant for Pylons East Anglia. As I am taking a view of the impact to the historic environment along the entire route of the Norwich to Tilbury line, I will be talking about the overall concerns of the methodology employed by the Applicant and the flaws and failings in the process that will result in considerable harm to the heritage assets – designated and non-designated, along the route, rather than individual heritage assets.

The Applicant has concluded, after many years, that the impact to the historic built environment along the entire Norwich to Tilbury route, will equate to less than substantial harm. As they claim that the mitigation hierarchy has been followed, the Applicant need not take any further measures, in accordance with NPS EN-1

So, everything the Applicant has been leading up to comes to this. Out of 8,846 heritage assets that were initially identified in the 5km swathe, only a handful of the total number of heritage assets will be impacted a bit, a few will be impacted slightly more, but none will be impacted enough to trigger NPS EN1. Whilst I understand that Historic England concur, based upon the information received to date, I understand that they have yet to agree a Statement of Common Ground and are still in dispute over many issues.

National Policy Statement EN-1 confirms that, notwithstanding the strong need for energy infrastructure, harm to heritage assets and their settings must be clearly justified and lawfully weighed. Section 104 of the Planning Act 2008 provides that consent must be refused where adverse impacts outweigh benefits. These provisions require a balanced judgement, rather than automatic approval, where significant heritage or landscape harm has been identified. We have already heard that many believe that significant landscape harm will be caused to the Cone Valley and other areas, and Pylons East Anglia believe that significant harm will be caused to a substantial number of heritage assets also, when assessed against Historic England Guidance. EN-1 Confirms that indirect and setting harm must be assessed and justified and accepts that infrastructure can alter the way heritage is *experienced*, not just seen.

EN-1 also requires the assessments of heritage assets to be fit for purpose and transparent. It does not endorse formulaic matrices where these obscure professional judgement, which Pylons East Anglia believe has been the case here. Pylons East Anglia would challenge how the settings assessments have been undertaken within the ES and previous historic environment assessments and believe that significant harm is caused by the cumulative effect of the tall and linear infrastructure on numerous heritage assets which have either been inaccurately assessed and have often been scoped out of assessment altogether.

### **With Regards to the Level of Harm**

The Applicant states There is no direct impact of the Project on any designated heritage asset. All relevant impacts are indirect impacts. This consequently scopes out all NDHAs which are directly impacted by the project, together with buried archaeology which has not been designated. I would like to point out that EN-1 States that non-designated heritage assets of archaeological interest that are of demonstrably equivalent significance of scheduled monuments should be considered subject to the policies for designated heritage assets, The absence of designation for such heritage assets does not indicate lower significance or necessarily imply that it is not of national importance. Flordon Roman Villa, which was raised earlier, is one such site.

### Within the Environmental Statement

1. Most assets have been assessed by the applicant as suffering from Lower Less than substantial harm due to slight or small changes within the setting of the designated asset (or elements of its setting that contribute to the asset's value) as these changes *would be largely screened from the asset*; or because they are at the *limit of the setting of the asset*. –Pylons East Anglia considers this methodology to be flawed, as setting depends on numerous factors which have not been taken into account – being screened does not divorce an asset from its setting – it is how the asset is experienced that should be assessed. We would hold that many of these assessments are therefore flawed.
2. The Applicant claims that Mid less than substantial harm is assessed where the changes within the setting of the designated asset would be noticeable with little or no screening. Pylons East Anglia argue that this may be the case from 1km + away, but the tall and linear infrastructure would be more than noticeable in all cases within 500m of the route. They would dominate the landscape, and cause high – very high levels of harm. We would hold that many of these assessments are therefore flawed.
3. The Applicant claims that Upper less than substantial harm is assessed where the changes would significantly alter a large proportion of the asset's setting. No assets have been assessed at this level. Pylons East Anglia disagree – the changes would not need to alter a large proportion of the assets setting, the changes would need to be of a scale that they impact the environment in which the asset or group of assets are experienced, by such a degree that dominates the landscape and/or views and which destroys the rural environment in which the assets are situated.
4. Pylons East Anglia would also suggest that Substantial Harm occurs in a limited number of cases – as a result to direct harm to NDHAs including Rivenhall Park and the Fordham Roman Site, and as a result of indirect harm to a **key** aspect of an assets significance. The work **KEY** is important here - This may occur where development Introduces large-scale, tall, vertical, or industrial elements into a setting whose significance depends on openness, horizontality, or calmness or where it interrupts principal or iconic views that are central to how the asset is understood and fundamentally alters how the place is experienced.

Dominance, proximity, scale, and contrast are all critical considerations in assessing harm.

Pylons East Anglia would state that the overall assessment of “less than substantial harm” has not been undertaken in accordance with the methodology outlined in EN-1. Failures to properly assess setting, particularly through desk based, matrix driven approaches, are therefore not **just** methodological issues, but policy failures when measured against domestic policy. Professional judgement must be demonstrable, consistent, and grounded in an on site understanding of place. Where matrices obscure rather than explain harm, the conclusions are not robust.

To be clear, The NPPF states that in addition to proximity of the project to an asset, setting harm can occur through:

- Loss of historic landscape coherence
- Introduction of modern infrastructure into historically legible land-use patterns and relationships
- Change to tranquillity, soundscape, and night-time character
- Perception of industrialisation of historic countryside

## With Regards to Cumulative Harm

To assess cumulative harm, the Applicant has used methodology as defined by the Institute of Environmental Management and Assessment rather than international accepted heritage guidance as laid down by ICOMOS. This states that Incremental or corridor-wide change can degrade setting to the point of serious harm, even if individual effects appear modest.

As a result, The Applicant, considers cumulative impacts to be derived from separate developments only. Pylons East Anglia accept that there is no policy or legal mechanism that allows multiple separate “less than substantial harms” to be automatically combined into a new or higher level of harm. Whilst UK legislation and guidance does not treat harm to numerous unrelated heritage assets from a single development as *cumulative harm* in itself, Pylons East Anglia would assert that cumulative harm can arise where impacts combine in a meaningful way (for example through shared setting, intervisibility, or historic relationships).

Historic England guidance (GPA3: The Setting of Heritage Assets) explains that cumulative effects arise where changes interact over time or space, such as:

- repeated impacts on the same asset or its setting – we understand that where instances of this arise, an assessment has been undertaken
- or impacts on groups of assets that share a common setting, landscape, or historic relationship;
- or incremental erosion of a coherent historic environment (for example an intervisible historic landscape).

In these cases, harm may properly be described as cumulative.

Furthermore, it should be noted that EN-1 states that consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment

For example: The cumulative harm to a number of assets in one location (eg. Ardleigh) should be assessed, as it is the group value that will be impacted in addition to the individual harm of each asset. Similarly, the impact to the setting between assets that have a functional or historic relationship adds to cumulative harm, as does the impact to NDHAs which contribute to an understanding of a farmstead for example, but whose significance and impact has not been assessed by the applicant.

Pylons East Anglia would therefore attest that the scale of harm to multiple assets still matters. While “less than substantial” harms cannot be added together to create a fictional “substantial” harm category, the overall extent and spread of harm across many assets is a material consideration in planning balance. Decision-makers are entitled to weigh:

- how many assets are affected;
- how widespread the harm is; and
- whether it changes the character or appreciation of the historic environment as a whole

To summarise, the scoping out of vast numbers of heritage assets and the underassessing of hundreds more has provided a misleading picture of the overall harm to the historic environment along the route of the project.

## Critical Infrastructure

The Applicant uses the "Critical National Priority" (CNP) status as a shield, arguing that the public benefit "*clearly and demonstrably outweighs*" any residual harm. This creates a situation where harm is acknowledged, but the necessity for the project justifies the harm identified. Pylons East Anglia believe the widescale lack of assessment and underestimation of harm has deliberately led to this conclusion.

In essence, the Applicant's position is that provided the threshold of "substantial harm" is not crossed, the public benefits of the scheme will automatically outweigh the harm identified. This is a misinterpretation of the mitigation hierarchy, which requires harm to be properly identified, avoided and reduced before any such balancing exercise can take place.

## With regards to routing

The Applicant has stated that '*The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on cultural heritage and archaeology assets where possible*'. And yet the route has remained fairly static since inception and has only been adjusted when objections have been received or mistakes highlighted. Route alignment must be demonstrably responsive to heritage sensitivity, and yet the line was moved closer to Bleak Hall in response to an objection from an equestrian establishment. This was undertaken because the building had failed to be identified as a heritage asset in the HEBR. The listed building will now be dominated by the project harming its significance.

## Scoping Opinion

In the Scoping Opinion adopted on 14 December 2022 for *East Anglia Green Energy Enablement (GREEN)*, the Planning Inspectorate repeatedly emphasised that the Environmental Statement should be proportionate, focused, and not over-elaborate, in line with the EIA Regulations.

In particular, the Scoping Opinion:

- Warned against unnecessary complexity in methodology where this would obscure, rather than clarify, likely significant effects
- Stressed that assessment should be clearly related to likely significant effects, not exhaustive cataloguing
- Emphasised that topics such as cumulative effects should be assessed in a structured and intelligible manner, avoiding over-complicated matrices or excessive layering that could mask real impacts
- Reinforced the need for professional judgement rather than mechanistic or overly technical approaches

This guidance applies across topic areas, including the historic environment, where proportional scoping and focused assessment were explicitly expected. [\[insip-documents.gov.uk\]](https://www.insip-documents.gov.uk)

## Why this matters in the current context

The Inspectorate's concern about over-complication was not an invitation to:

- Provide endless lists of HER archaeological data of no relevance;
- scope out assets wholesale;
- under-assess harm; or
- replace judgement with thresholds or ceilings.

Rather, it was intended to prevent methodological over-engineering, not to justify systematic exclusion or dilution of impacts. In fact, the Scoping Opinion makes clear that simplification must not result in a misleading picture of effects, and that proportionality must still deliver a robust understanding of overall harm where impacts are widespread. Pylons East Anglia would suggest that the applicant has failed to adhere to the scoping opinion.

#### Examples of Assets incorrectly scoped out or incorrectly assessed

The following provide a snapshot of assets Pylons East Anglia believe to have been incorrectly assessed with a downgrading of harm as a result.

NGET assessment of harm is shown first in brackets, followed by PEA assessment and a Actual Visual Representation where available to demonstrate impact.

- Assets: Flordon Hall GII\*, + 2 x GII + NDHAs 1050698 (**Mid v High**)



- Botney Hill Farmhouse GII 1322862 (**Mid v High**)



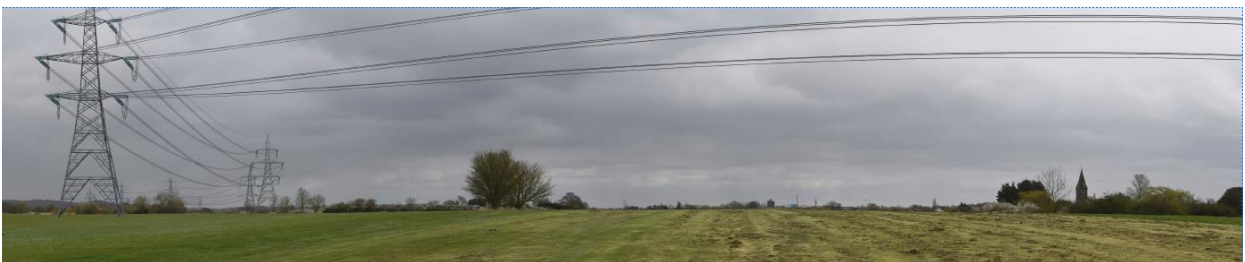
- 'The Grindle House' (GII) (1372456) and 'Gunn Farm Farmstead' (2476) NDHA 210m (**Scoped Out v Mid**)
- 'The Grange' (GII) (1194480) 130m (**Scoped Out v Mid**)
- Godbolts Farmhouse', Marks Tey (GII) (1224528) and Godbolts farmstead (4215) NDHA 200m (**Scoped Out v Low**)
- 'Mott's Farmhouse' (GII) (1266736) and Motts Farmstead (4214) 80m NDHA (**No Harm Due To Mature Vegetation v Mid**)
- 'Little Tey House' (GII) (1266823) and 'Barn To South West Of Little Tey House' (GII\*) (1266779) 50m (**Mid v Very High**)



- 'Teybrook Farmhouse' (1223156), Garden wall, stables and 2 barns, (GII) and Teybrook Farmyard (4225) NDHA **100m (Scoped Out v High)**
- Dunton Hall (GII) 1338380, Moat NDHA and DMV NDHA **80m (Mid v High)** – on raised ground with views to Marys Church



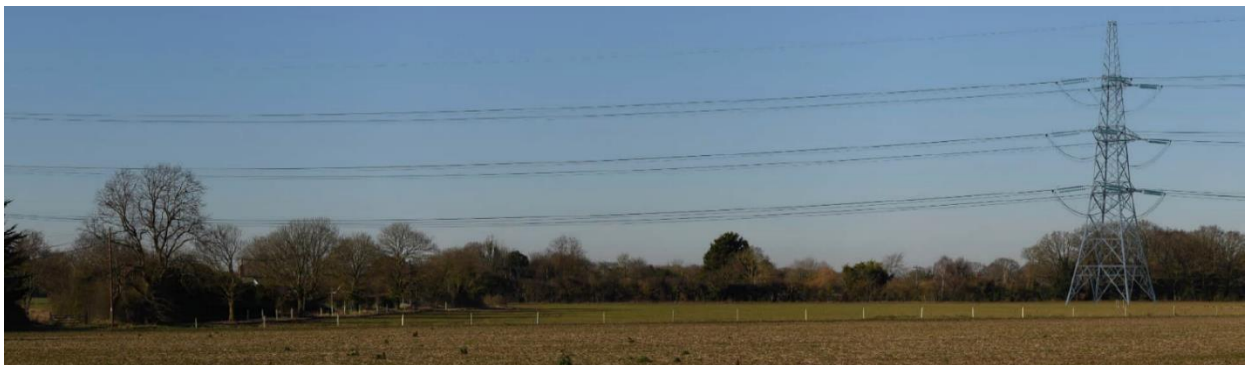
- St Marys Church GII 1122253 (**Mid vs Very High**)



- Rivenhall Place (GII\*) (1122598) and GII bridge and farm cottages 340m (**Low v High**)
- Rivenhall designed landscape, (**Mid v Substantial**)
- Heywood Manor (GII) 1049736 and Moat NDHA, and Estate Grounds NDHA (**75m**) (**Mid v Very High**)



- Ardleigh CA (**Low – Substantial**) due to proximity, dominating presence, removal of peace and tranquillity, surrounded on three sides, substation, approaches to and from CA, severance of historical and functional relationship with the countryside.
- Listed buildings within CA scoped out as within settlement
  
- Great and Little Waltham CA – (**Low v High**) + Langleys + Listed buildings in CA – cumulative harm



- Kenningham Hall (Mulbarton) (NHLE 1373056) is a Grade II listed building 100m (**Low v Substantial**) but the DOL cuts through the farmstead, and what appear to be curtilage listed (evident on 1882 OS map) rather than NDHA buildings. Furthermore ,the NDHA MDV will be directly impacted and lost as a result of the project.

The Project documentation identifies a moderate adverse and significant cumulative effect on Kenningham Hall. This is due to the increase in energy infrastructure within the asset's setting when the Project is combined with other proposed developments in the area