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Dear Norwich to Tilbury Casework Team

Historic England's Comments and Further advice at Deadline 5, Comments in relation to the ISFH and further information requested by the ExA under rule 17

We are writing in response to questions which have been raised about specific designated heritage assets within the remit of Historic England. We note that the applicant has responded to points raised in our Written Representation in document **8.8.1, 'Applicant's Comments on Written Representations'**. They have also responded to the Examining Authority's questions concerning the assets we commented on in document **8.9.1 'Applicant's Response to First Written Questions'**. Additional comment is also made in the **'Response to Rule 17 Letter - Historic Environment' REP4-318**.

Following the Issue Specific hearing topic on Cultural Heritage and the publication of the Rule 17 letter, we wanted to respond to the applicants' comments on the specific heritage assets. Please find our further comments below:

Flordon Hall (NHLE1050698, listed grade II*).

Responding to HE1.36 in First Questions concerning mitigation of impact on Flordon Hall the applicants state they considered mitigation through an alternative route, but this was not taken forward because of the impact on nearby residences. This means the impact on the designated asset could potentially have been further mitigated however this has been discounted because of the potential impact on residential amenity.

We appreciate there are balancing factors in relation to decision making. Whilst we can comment upon the level of harm to the designated heritage assets, the overall balance with residential amenity is an aspect that Historic England are not in a position to comment on. This rests with the Examining Authority (ExA) in their consideration of the matter. As a part of that

the ExA would also need to consider if any proposed mitigation is suitable and has been applied appropriately in this case.

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*).

Responding to HE1.15 in First Questions concerning Tacolneston conservation area the applicants state they accept our view that the rural landscape setting could have been given greater weight in their Environmental Assessment and conclude that a lower level of less than substantial harm could be caused to the significance of the conservation area by the development in its operation phase.

We agree with this assessment and recommend this assessment is included in the Environmental Statement (ES) and given appropriate weight by the ExA in their consideration of the matter.

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

The applicant has commented on our Written Representation in document 8.8.1 (page 68). We previously raised concerns in our Written Representation (paragraphs 2.17- 2.23) that in our view the applicant had not considered the valley setting of the church. Their response again chiefly focuses on views from the churchyard, rather than views towards the church from the side and bottom of the valley or in general views which include both church tower and the proposed pylons.

This additional clarification does not therefore address our comment. That views are limited from the churchyard by vegetation on the boundary appears in the applicant's representation and was repeated verbally during the Issue Specific Hearing on 29th April in response to questions. But we would note that there are several points on the southern boundary of the churchyard, as well as just outside it where views of the valley are unrestricted.

We would again conclude that the visual impact on views from the churchyard, as well as views towards the church in its landscape setting have not been assessed in sufficient detail or given due weight by the applicant. We recommend the ExA specifically ask the applicant to address these matters in the assessment.

The ExA would also need consequently to consider if the proposed mitigation is suitable and has been applied appropriately in this case.

Bush Hall

Historic England maintains a difference of opinion to the conclusions drawn by the applicant in relation to Bush Hall as set out at in document 8.8.1 (page 70). We are aware this is a non-designated asset, but one which demonstrated higher values and potential equivalence to a designated heritage asset. We agree with the applicant that it is clearly not necessary, to undertake further archaeological evaluation to establish whether the site has a higher value or not, especially (as set out in our Written Rep) as there is clear evidence for an above average survival and preservation of the asset, and a good presentation of the earthworks.

There is also a clear potential for the survival of archaeological deposits across the site in both the platform and the ditches. In addition, there is the potential for waterlogging. The partial backfilling of one arm does not seriously negatively affect the overall evidential or historic value. Our view is that it clearly demonstrates factors that would place it within the high value category.

In terms of level of harm, we note the asset is partially within the order limits and would be over sailed by the cables. The cables would therefore be highly visible from the asset and therefore within the landscape that contributes most to the significance of the assets. The magnitude of change is therefore also high.

We appreciate the applicant has set out the controls and mechanisms that would be in place to manage impacts and confirm these are appropriate and proportionate. However, an appropriately ascribed value for the asset would also affect the level of impact and harm.

We therefore recommend the ExA asks the applicant to address this inconsistency. This is to provide appropriate evidence to allow the balance to be weighed between harm and benefit for this asset. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.

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

The applicant has commented on our Written Representation in document 8.8.1 (page 71). We note the applicant's agreement with our assessment that that views from the asset towards the proposed development are important.

We also agree with their assessment that it would result in a lower level of less than substantial harm to the significance of the listed building, and recommend this assessment is included in the Environmental Statement (ES) and given appropriate weight by the ExA in their consideration of the matter.

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

The applicant has commented on our Written Representation in document 8.8.1 (page 71). In this they accept that views to the southwest of the conservation area would include the proposed pylons but conclude that this would not increase the level of harm they previously assessed (i.e. a lower level of less than substantial harm).

We remain of the view that the southern part of the western end of the conservation area is an important part of this designated heritage asset with open views across it towards the proposed development and that the visibility the applicants acknowledge would result in additional harm to its significance. As we noted in our Written Representation (paragraphs 2.30- 2.34), the size of the historic common at Melis and the fact that it has not been subdivided by buildings encroaching into the open space makes the ability to appreciate it in a rural context important.

We therefore feel that the additional impact on views over the southwest part (which the applicant has also accepted) would increase the level of harm to a middle level of less than substantial harm to its significance.

Moat Yard Plantation Mellis (2253 3.3.372) PP71

We acknowledge the applicants' comments and revisions, we confirm we agree with the assessment and do not have any further comments.

Roydon Hall (NHLE 1033215 listed grade II*) and Barn to the Northwest and (NHLE 1284584, listed grade II*), near Creting Saint Peter.

The applicant has commented on our Written Representation in document 8.8.1 (page 73), acknowledging our view that there could be views of the listed building towards the east in which the proposed pylons would appear. We understand an additional verified viewpoint image might be produced to illustrate this, but on the basis of the information available we would agree with the applicant's conclusion that the proposed development would result in a mid-level of less than substantial harm.

We also note that in responding to HE1.36 in First Questions concerning mitigation of impact on Roydon Hall the applicants state they considered mitigation through an alternative route but that this was not taken forward and conclude that planting would not work as effective mitigation.

We are inclined to agree with the latter point, but Historic England is not in a position to comment on the justification for not taking forward the alternative route and would leave this to the ExA in their consideration of the matter.

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

The applicant has commented on our Written Representation in document 8.8.1 (page 74). In this, they acknowledged that views of the listed building from the east and southeast would be affected, as would views from Mill Lane. However, the applicant states this would not 'lessen understanding of the asset at the heart of a working farm complex'.

To clarify, we have not suggested it would have such an effect. We do consider though that the presence of the proposed pylons in this landscape could detract further from the rural setting of this vernacular building and that this might result in additional harm to that identified by the applicants in the Environmental Statement.

This additional harm does not appear to have been acknowledged by the applicant and in our view could raise the level of harm to the upper end of mid to less than substantial harm. We recommend the ExA specifically ask the applicant to address these matters in the assessment.

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).

The applicant has commented on our Written Representations in document 8.8.1 (page 75). In this the applicant acknowledges that 'moderately long distant views of the pylon tops might be visible from the edge of the conservation area closest to the proposed development'. They further note that any impact would not be sufficient to raise the level of harm from the lower less than substantial category. We agree with this assessment.

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*).

The applicant has commented on our Written Representation in document 8.8.1 (page 75). In this the applicant acknowledges that views of the pylons may potentially be seen from the immediate vicinity of the grade II* listed barn but 'disagree with the assumption [made by Historic England] that intervisibility alone means the setting of the barn extends to the order limits.' They go on to note that 'the setting of a heritage asset is not defined solely by whether it is visible from or has visibility to a development.'

Our assessment has not made that assumption, and we agree that the definition of setting of a heritage asset (as stated in the glossary to the National Planning Policy Framework) is ‘the surroundings in which the asset is experienced.’ We rather considered, based on viewpoint image 3.09 (Figure 7.12.F79_VP 3.09), that the agricultural landscape in which the grade II* listed barn is experienced would be affected by the proposed pylons. As this agricultural landscape is important to the understanding of the barn and its historic function as an agricultural building, we conclude that the proposed development would detract from this setting and would therefore cause harm to the significance of the barn.

We do however remain of the view that this would be harm at a lower level of less than substantial harm.

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

The applicant has commented on our Written Representations in document 8.8.1 (page 77). In this the applicant does not address the specific matters raised in our representations that there are views from the churchyard towards the post pylons only some 500m away and that verify viewpoint image VP 4.08 shows both the church tower and the pylons in the same image. The image shows that the asset can be experienced within the area depicted, and this is within the setting of the listed church. In our view the development would detracts from the setting of the church and harms its significance at the lower end of the lesser substantial range.

The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.

Fordstreet Conservation Area, including Wash Farmhouse (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*).

In responding to HE1.36 in First Questions concerning mitigation of impact on the conservation area the applicants state they considered mitigation through an alternative route to the west but that this was not taken forward due to the presence of an active airfield and conclude that planting would not work as effective mitigation. We are inclined to agree with the latter point, but Historic England is not in a position to comment on any justification for not taking forward the alternative route and would leave this to the ExA in their consideration of the matter.

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

The applicant has commented on our Written Representations in document 8.8.1 (page 77-8). In this the applicant repeats their assessment that the impact of the proposed development would result in a mid-level of less than substantial harm.

They do not respond to the point made in our Representations (paragraph 2.74) that being only 186m from the listed building the ‘dominant scale of the pylons and the importance of this side of the barn in having a clear relationship to fields would make that [harm] of a high order of mid-level less than substantial harm.’ We remain of the view that this would be the case.

We recommend the ExA ask the applicant to address the inconsistencies in their assessment, and dependent on the outcome of that, the ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.

In responding to HE1.36 in First Questions concerning mitigation of impact on the conservation area the applicant states they considered mitigation through an alternative route to the west but that this was not taken forward due to the presence of an active airfield and conclude that planting would not work as effective mitigation. We are inclined to agree with the latter point, but Historic England is not in a position to comment on any justification for not taking forward the alternative route and would leave this to the Examining Authority in their consideration of the matter.

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

The applicant has commented on our Written Representations in document 8.8.1 (page 77-8). In this the applicant notes that planting would restrict views and result in a mid-level of less than substantial harm and that the proposed pylons would not ‘dominate the skyline’. Without a viewpoint image we are unable to comment on the precise degree of visual dominance but would accept that the resulting harm is likely to fall within the mid-level of less than substantial harm range.

In responding to HE1.36 in First Questions concerning mitigation of impact on the listed building the applicant states they considered mitigation through an alternative route but that this was not taken forward due to the presence of an active airfield and conclude that planting would not work as effective mitigation. We are inclined to agree with the latter point, but Historic England is not in a position to comment on any justification for not taking forward the alternative route and would leave this to the Examining Authority in their consideration of the matter.

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

In responding to HE1.36 in First Questions concerning mitigation of impact on the listed building the applicant states they considered mitigation through an alternative route to the west, but that this was not taken forward due to the presence of an active airfield and conclude that planting would not work as effective mitigation. We are inclined to agree with the latter

point, but Historic England is not in a position to comment on any justification for not taking forward the alternative route and would leave this to the ExA in their consideration of the matter.

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

In responding to HE1.36 in First Questions concerning mitigation of impact on the listed building the applicant states they were unable to identify any alternative routes and conclude that planting would not work as effective mitigation. We are inclined to agree with the latter point given the proximity of the proposed pylons to the listed building and the distance to the Draft Order Limits. Historic England is not in a position to comment on any justification for not establishing alternative routes and would leave this to the ExA in their consideration of the matter.

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

The applicant has commented on our Written Representations in document 8.8.1 (page 77-8). In this the applicant acknowledges our view that views to and from the heritage assets from the south were underrepresented in the Environmental Statement's assessment. It is stated that because of screening vegetation the level of harm remains at the 'lower less than substantial' level.

We would accept the level of harm as being within this category but remain of the view that the impact on views to and from the south presents an additional element of harm that would need to be considered. We recommend the ExA specifically ask the applicant to address this matter in their assessment. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.

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

In responding to HE1.31 in First Questions the applicant notes the closest proposed pylon would be some 490m away but would affect only a 'small part of the setting' of Rivenhall Place, resulting in harm to its significance at the lower end of less than substantial harm. We would broadly accept that position, however we note that where visible from the grounds of the Hall the pylons could have a pronounced impact.

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).

The applicant has commented on our Written Representations in document 8.8.1 (page 79). In this they maintain that the setting of the heritage assets does not extend to the draft order

limits, but they have not responded to the comments we made on this matter in our Written Representation (paragraph 2.93).

In this we drew attention to viewpoint image HE 13 (Figure 7.12.F220-HE13) which shows the proposed pylons visible in the surroundings in which the listed church and scheduled monument can be experienced (the definition of setting set out in the National Planning Policy Framework).

This indicates that the setting does extend to the Draft Order Limits and the closet pylon (TB091) would be some 987m from the church. At this distance the line of pylons would not be dominant in the landscape, but it remains our view that it could detract from the rural setting of both these heritage assets and so would potentially result in harm to the significance of the monument as well as the church.

We would consider this at the lower end of the less than substantial category. We recommend the ExA specifically ask the applicant to address these matters in their assessment. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.

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

The applicant has commented on our Written Representations in document 8.8.1 (page 80). In our Representations (paragraph 2.98) we questioned how the applicants had concluded that the setting of the listed Wagon Lodge and Garden Wall would not extend to the Draft Order Limits.

The applicant has not addressed this, but repeats the remark made in their comments on Written Representations regarding Little Wenham Castle (above) that we assume 'intervisibility alone means the setting of the Wagon Lodge and garden wall extends to the order limits.' As before, our assessment is not based on this assumption, and we are aware that the definition of setting of a heritage asset (as stated in the glossary to the National Planning Policy Framework) is 'the surroundings in which the asset is experienced.'

We therefore consider, based on viewpoint image 5.11 (Figure 7.12.F126-VP5.11), that the proposed development could be seen in the surroundings in which these heritage assets are experienced and, as the applicant concludes regarding the Scheduled Monument, the result might be harm to their significance in the lower level of less than substantial harm.

We recommend the ExA specifically ask the applicant to address these matters in their assessment. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.

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

The applicant has commented on our Written Representations in document 8.8.1 (page 80-81). In this the applicant accepts that the intervisibility between the church and the proposed development could be significant, but the question we have raised in our Representations (paragraph 2.106 - 2.108) is that Viewpoint image VP5.08 (Figure 7.12.F143_VP5.08) shows the proposed pylons visible in the surroundings in which the heritage asset can be experienced (i.e. its setting).

We therefore conclude that the development would be in its setting and that this might result in harm to significance. This has not been addressed. We therefore recommend the ExA specifically ask the applicant to address this matter in their assessment. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.

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

The applicant has commented on our Written Representations in document 8.8.1 (page 81). This states that views towards the asset from the 'associated ground would not be affected'. Given that the proposed pylons would be some 250m from the listed building and the limited planting on the boundary of the garden we do not agree with this assessment and consider the significance of the listed building would likely be harmed. Without a verified viewpoint image, the precise degree of impact is hard to establish but given the proximity the development could be a dominant feature resulting in a lower or even mid-level of less than substantial harm.

We recommend the ExA specifically ask the applicant to address this matter in their assessment. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.

Little Waltham Conservation Area.

The applicant has commented on our Written Representations in document 8.8.1 (page 81-82). This accepts that the proposed development would be within 150m of the conservation area boundary but considers the part of the conservation area in question to be of limited value as the rural setting of the village has been degraded by the modern by-pass road. The conclusion is that the level of harm would remain at the lower end of less than substantial. We feel the area of the conservation area closest to the pylons has been underrated by the applicant. It has however been included within the designated heritage asset (not just part of its setting)

and illustrates the relationship of the settlement to the river valley. We have also raised the possibility that such is the proximity of the proposed pylons at this point that they might be visible between buildings on the Street. This has also not been addressed by the applicants.

We conclude that there could be additional harm to this part of the conservation area which has not been included in the applicant's conclusion, although the level of harm is likely to be within the category of less than substantial harm. We recommend the ExA specifically ask the applicant to address this matter in their assessment. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.

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).

The applicant has commented on our Written Representations in document 8.8.1 (page 82-83). In our Written Representations (paragraph 2.121) we drew attention to the southern part of the conservation area at Minnow End). The applicant responds to this, noting that this is only a small part of the agricultural setting of the conservation areas as a whole and taking the view that it does not contribute to the significance of this heritage asset to the same degree as the interior of the village and the parkland. Our view remains that the agricultural setting of the conservation area is important in an understanding of the village and Langley Park's historic significance. From the applicant's comments it is not stated if they have concluded the effect on the southern part of the conservation area would be additional harm, so we remain of the view that this would raise the level of harm they have previously concluded, perhaps higher within the less than substantial harm range.

During the Issue Specific Hearing on 29th April in response to questions about views from the interior of Langley's mansion house the applicant commented on the views from ground and principal first floor rooms looking towards the Draft Order Limits. Their conclusion appeared to be that the quality of the first-floor rooms' interiors was such that views from them had not been considered significant, although they did seem to accept that views from houses of this type were often important. We consider it might be helpful to the ExA if the applicant provided more clarity on these views and their position, perhaps including images from the historic first floor principal room to illustrate it.

In responding to HE1.36 in First Questions concerning mitigation of impact on the listed building the applicant states they considered an alternative route to the west of Great Waltham but that this was not taken forward. Historic England is not in a position to comment on any justification for not taking forward the alternative route as this rests with the ExA in their consideration of the matter.

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

In responding to HE1.15 in First Questions the applicants state that the church yard is partially screened by vegetation but that the church's setting does extend to the draft order limits and they conclude that the impact of the proposed development would result in a lower level of less than substantial harm to its significance. We agree with this conclusion.

As we have previously noted in our Written Representation (paragraphs 2.123-124) the conservation area does however include the churchyard (the churchyard itself is therefore part of the designated heritage asset). It also includes land immediately west of the churchyard from which both the church and the same land to the west can be seen. In answer to Question HE1.15 the applicant states that the conservation area's setting is only 'immediate agricultural land to the west'. This seems to suggest that that the setting of the conservation area at this point is different from that of the church. However, the surroundings in which church and conservation area are at this point experienced are clearly the same, their settings must, therefore, be the same.

The applicant has not addressed this. We therefore maintain our view that there would be a lower degree of less than substantial harm to the conservation area resulting from the proposed development. We recommend the ExA specifically ask the applicant to address this matter in the assessment. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.

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

The applicant has commented on our Written Representation in document 8.8.1 (page 84). This describes the 'secluded environment' of the churchyard but doesn't respond specifically to our comments on views towards the church in its setting which could be affected by the proposed development. As the closest pylon would be approximately 390m from the church we conclude there could be views of the church also featuring the pylons and there might be a degree of less than substantial harm to its significance resulting.

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

The applicant has commented on our Written Representation in document 8.8.1 (page 85). In this 20th century development adjacent to the site is mentioned as not affecting the relationship between the listed building and the proposed development. The presence of vegetation on the rear boundary of the house is also noted, and this seems to be a principal reason for the conclusion that the setting of the farmhouse does not extend to the draft order limits 'solely because of intervisibility'.

Again, we would want to draw attention to the comment in our written representation paragraph 2.127 that viewpoint image HE39 (Figure 7.12.F-248-HE39) shows the pylons in the surroundings in which the listed building is experienced. As this is the definition of the setting of a heritage asset in the glossary of the National Planning Policy Framework, we conclude that the proposed development would be in the setting of the listed building and potentially result in harm to its significance at a lower less than substantial level.

We recommend the ExA specifically ask the applicant to address this matter. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.

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

The applicant has commented on our Written Representation in document 8.8.1 (page 85). In this the applicant agrees that the land to the west of the registered park does constitute part of its setting but states that this setting only extends by 800m, rather than being the surroundings in which the asset is experienced (the definition of setting in the glossary of the National Planning Policy Framework). No evidence is provided to substantiate this 800m limit to 'experience' but even without this we would note that the closest pylon would be some 600m from the edge of the registered park. We therefore maintain the view in our Representations (paragraph 2.132) that this would result in harm to the significance of the heritage asset at a lower level of less than substantial harm.

We therefore recommend the ExA specifically ask the applicant to address this matter in the assessment. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.

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

The applicant has commented on our Written Representation in document 8.8.1 as regards the grade II listed cistern house and wall to the north and east of Ingatestone Hall (page 86). In this the applicant states that the proposed development would be 'beyond the edge of the valley in which they are located' and therefore conclude that their setting does not extend to the Draft Order Limits. This may be the case, but the proposed pylons near Buttsbury church are close to the edge of the valley and given their height it is possible they could be visible. It is unclear if the applicants have carried out calculations about the height and therefore potential visibility,

but we remain of the view that should the pylons be visible then they could potentially detract from the otherwise rural setting of these assets.

We recommend the ExA ask the applicant to address this matter in the assessment. The ExA would also need to consider if the proposed mitigation is suitable and has been applied appropriately in this case.

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

The applicant has commented on our Written Representation in document 8.8.1 (page 87-88), Commenting that they would maintain their view that the harm to the significance of the church would be at a mid-level of less substantial harm not the higher level within that middle range which we have suggested. We have no additional comment to make on this conclusion.

In responding to HE1.36 in First Questions concerning mitigation of impact on the listed building, the applicant states the proposed pylon route has not been moved but that consideration of using lower pylons to reduce the visual impact still further was considered. This has not been taken forward. They also state that in their view additional planting would not make any significant contribution to mitigation. We are inclined to agree with the latter point given the proximity of the proposed pylons to the listed building and the distance to the Draft Order Limits. Clearly lower pylons could reduce visibility, but Historic England is not in a position to comment on any justification for not taking this forward and would leave this to the Examining Authority in their consideration of the matter.

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

In responding to HE1.15 in First Questions the applicant states that they have reviewed their assessment of the setting of the listed building and conclude that it does make a minor contribution to significance but agree with our conclusion that this would not constitute harm to the significance of the designated heritage asset.

Conclusion

There are several outstanding matters with regards to the OWSI, OAMS and relating the technical delivery of the archaeological mitigation, such as the geo-archaeological programme, and we are continuing to work with the applicant to address these matters through continued engagement and through the SoCG.

As with all our advice we hope that these comments are useful. We are pleased to see that many of the points we have mentioned have been addressed by the applicant and confirm that we remain in discussion on other matters. We appreciate there are still a small number of remaining differences.



Please do not hesitate to contact us for further information about any of the matters raised or for further clarification.

Yours sincerely

[REDACTED]
Development Advice Team Leader
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