



**The Great Grid Upgrade**

Sea Link

# Preliminary Environmental Information Report

Volume: 1

Part 2 Suffolk Onshore Scheme

Chapter 4 Cultural Heritage

Version A

October 2023



nationalgrid

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# Sea Link

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## 2.4 Cultural Heritage

### 2.4.1 Introduction

- 2.4.1.1 This chapter of the Preliminary Environmental Information Report (PEIR) presents information about the preliminary environmental assessment of the likely significant cultural heritage effects identified to date, that could result from the Proposed Project (as described in **Volume 1, Part 1, Chapter 4: Description of the Proposed Project**).
- 2.4.1.2 This chapter describes the methodology used, the datasets that have informed the preliminary assessment, baseline conditions, mitigation measures and the preliminary cultural heritage residual significant effects that could result from the Proposed Project.
- 2.4.1.3 The draft Order Limits, which illustrate the boundary of the Proposed Project, are illustrated on **Figure 1.1.1 Draft Order Limits** and the Suffolk Onshore Scheme Boundary is illustrated on **Figure 1.1.2 Suffolk Onshore Scheme Boundary**.
- 2.4.1.4 This chapter should be read in conjunction with:
- **Volume 1, Part 1, Chapter 4: Description of the Proposed Project;**
  - **Volume 1, Part 1, Chapter 5: PEIR Approach and Methodology;**
  - **Volume 1, Part 1, Chapter 6: Scoping Opinion and EIA Consultation;**
  - **Volume 1, Part 2, Chapter 1: Evolution of the Suffolk Onshore Scheme;** and
  - **Volume 1, Part 2, Chapter 2: Landscape and Visual.**
- 2.4.1.5 This chapter is supported by the following figures:
- **Volume 3, Figure 2.4.1: Heritage assets within the 500 m study area;**
  - **Volume 3, Figure 2.4.2: Designated assets within the 2 km study area with the Zone of Theoretical Visibility (ZTV) for the Proposed Project;**
  - **Volume 3, Figure 2.4.3: Designated assets within the 2 km study area with the ZTV for SeaLink and Friston;**
  - **Volume 3, Figure 2.4.4: Designated assets within the 2 km study area along with the ZTV for Co-location;** and
  - **Volume 3, Figure 2.4.5: Designated assets within the 2 km study area along with the ZTV for Co-location and Friston.**
- 2.4.1.6 This chapter is supported by the following appendices:
- **Volume 2, Part 1, Appendix 1.4.A: Outline Code of Construction Practice;**
  - **Volume 2, Part 1, Appendix 1.4.F: Outline Schedule of Environmental Commitments and Mitigation Measures;** and
  - **Volume 2, Part 2, Appendix 2.4.A: Cultural Heritage Gazetteers.**

## 2.4.2 Regulatory and Planning Context

- 2.4.2.1 This section sets out the legislation and planning policy that is relevant to the preliminary cultural heritage assessment. A full review of compliance with relevant national and local planning policy will be provided within the Planning Statement that will be submitted as part of the application for Development Consent.
- 2.4.2.2 Policy generally seeks to minimise cultural heritage effects from development and to avoid significant adverse effects.

### Legislation

#### **Ancient Monuments and Archaeological Area Act 1979**

- 2.4.2.3 The Ancient Monument and Archaeological Areas Act (1979) ('the Act') is the central piece of legislation for the protection of the archaeological resource (Ref 2.4.1). The first section of the Act requires the Secretary of State for National Heritage to maintain a schedule of nationally important sites. For the purpose of the Act, a monument is defined as:

*"a) any building, structure or work, whether above or below the surface of the land, and any cave or excavation;*

*b) any site comprising the remains of any such building, structure or work or of any cave or excavation; and*

*c) any site comprising, or comprising the remains of, any vehicle, vessel, aircraft or other moveable structure or part thereof which neither constitutes nor forms part of any work which is a monument as defined within paragraph a) above; d) and any machinery attached to a monument shall be regarded as part of the monument if it could not be detached without being dismantled' (Section 61 (7))."*

- 2.4.2.4 The Act further defines an ancient monument as: *"any Scheduled Monument; and any other monument which in the opinion of the Secretary of State is of public interest by reason of the historic, architectural, traditional, artistic or archaeological interest attaching to it' (Section 61 (12))."*

- 2.4.2.5 A set of criteria, defined as survival/condition, period, rarity, fragility/vulnerability, diversity, documentation, group value and potential, assist in the decision-making process as to whether an asset is deemed of national importance and best managed by scheduling.

#### **The Planning (Listed Buildings and Conservation Areas Act) 1990**

- 2.4.2.6 The Act sets out the principal statutory provisions which must be considered in the determination of any application affecting either listed buildings or conservation areas (Ref 2.4.2).
- 2.4.2.7 Section 66 of the Act states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

- 2.4.2.8 Section 72 of the Act establishes that special attention be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area.

## National Policy

### National Policy Statements

- 2.4.2.9 National Policy Statements (NPSs) set out the primary policy tests against which the application for a Development Consent Order (DCO) for the Proposed Project would be considered. A review of the NPS was announced in the 2020 Energy white paper: Powering our net zero future. This review was to ensure the NPSs were brought up to date to reflect the policies set out in the white paper. The below information reflects these updates currently under consultation. Table 2.4.1 and Table 2.4.2 below provide details of the elements of NPS for Energy (EN-1) (Ref 2.4.3) and NPS for Electricity Networks Infrastructure (EN-5) (Ref 2.4.4) that are relevant to this chapter, and how and where they are covered in the PEIR or will be covered within the Environmental Statement (ES). The tables also cover relevant policy changes from the updated Draft EN-1 (Ref 2.4.5) and EN-5 (Ref 2.4.6).

Table 2.4.1 NPS EN-1 requirements relevant to cultural heritage

NPS EN-1 section	Where this is covered in the PEIR
<p><i>5.8.8 The applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset. As a minimum the applicant should have consulted the relevant Historic Environment Record (or, where the development is in English or Welsh waters, English Heritage or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact.</i></p>	<p>An initial assessment of assets potentially affected by the Proposed Project has been undertaken, and how setting contributes to significance has been taken into account where appropriate (see Section 2.4.9 for initial assessment).</p> <p>The Suffolk Historic Environment Record (HER) was consulted as part of the PEIR process, and data collected was used in producing the preliminary baseline text (Section 2.4.7) and in preparing the initial impact assessment (Section 2.4.9).</p> <p>Stakeholder engagement has been undertaken with organisations including Historic England and Suffolk County Council (see section 2.4.3).</p>
<p><i>5.8.9 Where a development site includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment</i></p>	<p>A desk-based assessment will be carried out and the results of this included in the ES. The scope of further evaluation will be agreed with consultees and</p>



NPS EN-1 section	Where this is covered in the PEIR
<p><i>and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, representative visualisations may be necessary to explain the impact.</i></p>	<p>the results will be included in the ES. The evaluation trenching will be informed by geophysical survey and the results of other remote sensing such as aerial photography and Light Detection and Ranging (LiDAR) LiDAR survey.</p> <p>The requirement for visualisations will be agreed through ongoing consultation with heritage stakeholders.</p>
<p><i>5.8.11-14 Concerns decision making by the IPC in relation to heritage assets. It states that in determining applications great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Any harm or loss should require clear and convincing justification; substantial harm to or loss of a Grade II listed building, park or garden should be exceptional; substantial harm to or loss of designated heritage assets of the highest significance, should be wholly exceptional.</i></p>	<p>A preliminary assessment of potential impacts has been undertaken as part of this Preliminary Environmental Information Report, and a full assessment will be included in the ES. The preliminary assessment is based on current knowledge. The final assessment in the ES will be based on the significance of the asset, as described in the baseline section of the Cultural Heritage chapter and will allow PINS to understand the degree of any loss or harm to assets.</p>
<p><i>5.8.15-18 Describes the balance to be made in the planning process: Any harm should be weighed against the wider benefits of the application, although the stringency of the test is scaled in relation to the degree of harm to the heritage significance of the asset and whether or not the asset is designated.</i></p>	<p>The results of the heritage assessment will be concluded as part of the ES.</p> <p>The initial assessment is covered in the 'Preliminary Assessment of Effects' Section 2.4.9, while outline mitigation is covered in the 'Mitigation' section 2.4.8.</p>
<p><i>5.8.19-22 States that the IPC should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.</i></p>	<p>A robust mitigation strategy will be discussed and agreed with stakeholders including Historic England (HE) and Suffolk County Council (SCC) during the preparation of the ES.</p> <p>Initial mitigation measures are covered in Section 2.4.8.</p>

NPS EN-1 section	Where this is covered in the PEIR
<p>The draft EN-1 removes the presumption in favour of the conservation of designated assets. It also states that the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to or loss of significance is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:</p> <ul style="list-style-type: none"> <li>• the nature of the heritage asset prevents all reasonable uses of the site;</li> <li>• no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;</li> <li>• conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and</li> <li>• the harm or loss is outweighed by the benefit of bringing the site back into use.</li> </ul>	<p>There are no scheduled monuments or designated heritage assets within the draft Order Limits. The Proposed Project design will ensure that no designated asset will be removed or rendered unviable. Any substantial harm to, or loss of an asset, will be clearly set out in the ES.</p>
<p>While the current EN-1 acknowledges that impacts to non-designated assets should be considered by the IPC, the draft EN-1 explicitly states that the effect of an application on the significance of non-designated assets should be considered in determining the application.</p>	<p>Non-designated heritage assets are to be identified within the cultural heritage baseline of the ES, and their significance assessed including any contribution from setting. The cultural heritage chapter will identify potential likely significant effects on the significance of non-designated assets arising from the Proposed Project.</p>

Table 2.4.2 Draft NPS EN-5 requirements relevant to cultural heritage

NPS EN-5 section	Where this is covered in the PEIR
<p><i>2.2.5... in formulating proposals for new electricity networks infrastructure, to “have regard to the desirability of preserving natural beauty, of</i></p>	<p><b>Volume 1, Part 1, Chapter 3: Main Alternatives Considered</b> presents the</p>

NPS EN-5 section	Where this is covered in the PEIR
<p><i>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.”</i></p>	<p>iterative process that commenced at Project inception. Environmental, engineering and economic considerations have influenced the optioneering and design evolution process.</p> <p>The heritage value of assets as well as the archaeological potential of the area will continue to be investigated through to the ES stage, with additional data collected (e.g., archive, LiDAR, geophysical survey) included in the impact assessment of the ES. This will form a key element of the mitigation strategy.</p> <p>The initial assessment is covered in section 2.4.9 ‘Preliminary Assessment of Effects’ section, while outline mitigation is covered in section 2.4.8.</p>
<p><i>2.8.9... the environmental and archaeological consequences (undergrounding a 400kV line may mean disturbing a swathe of ground up to 40 metres across, which can disturb sensitive habitats, have an impact on soils and geology, and damage heritage assets, in many cases more than an overhead line would).</i></p>	<p>Potential physical impacts will be assessed fully as part of the ES, with a mitigation strategy developed in consultation with relevant heritage stakeholders. The initial assessment is covered in section 2.4.9 ‘Preliminary Assessment of Effects’ section, while outline mitigation is covered in section 2.4.8.</p>
<p><i>2.11.14 ... the additional cost of the proposed underground or sub-sea alternatives, including their significantly higher lifetime cost of repair and later uprating • the potentially very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage sites, soil, geology, and, for a substantial time after construction, landscape and visual amenity.</i></p>	<p>The initial assessment is covered in section 2.4.9 ‘Preliminary Assessment of Effects’ section, while outline mitigation is covered in section 2.4.8.</p> <p>It should be noted than an overhead option would have the potential to result in great</p>

NPS EN-5 section	Where this is covered in the PEIR
	setting impacts on heritage assets.

2.4.2.10 There are no other new or materially different policy considerations for Cultural Heritage within the Draft EN-5(Ref 2.4.6), when compared to the current EN-5 (Ref 2.4.4) .

### National Planning Policy Framework

2.4.2.11 The National Planning Policy Framework (NPPF) (Ref 3.4.7) has the potential to be considered important and relevant to the SoS’ consideration of the Proposed Project. Table 2.4.3 below provides details of the elements of the NPPF that are relevant to this chapter, and how and where they are covered in the PEIR or will be covered within the ES.

Table 2.4.3 NPPF requirements relevant to cultural heritage

NPPF section	Where this is covered in the PEIR
<i>Section 16 of the NPPF deals specifically with the historic environment. Where changes are proposed, the NPPF sets out a clear framework to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance.</i>	An initial assessment of significance of heritage assets, as well as the setting of assets, has been undertaken (see Preliminary Assessment of Effects’ section 2.4.9). The full detailed impact assessment will form part of the final ES.
<i>The NPPF sets out the importance of being able to assess the significance of heritage assets that may be affected by a development. Significance is defined in Annex 2 of the NPPF as being the “value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic”. Significance is not only derived from an asset’s physical presence, but also from its setting. The setting of a heritage asset is defined in Annex 2 as “the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve”.</i>	An initial assessment of value/significance of heritage assets, as well as the setting of assets, has been undertaken as part of the PEIR process (Preliminary Assessment of Effects’ Section 2.4.9). The full detailed impact assessment will form part of the final ES.
<i>Paragraph 194 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset’s importance and no more than is sufficient to</i>	An initial assessment of significance, as well as the setting of assets, has been undertaken as part of the PEIR process (Preliminary Assessment of Effects’ Section 2.4.9). The full

NPPF section	Where this is covered in the PEIR
<p><i>understand the potential impact of the proposal on their significance. Similarly, paragraph 195 includes a requirement on local planning authorities, having assessed the particular significance of any heritage asset that may be affected by a proposal, to take this into account when considering the impact of a proposal on a heritage asset.</i></p>	<p>detailed impact assessment will form part of the final ES.</p>
<p><i>Paragraphs 199 to 203 of the NPPF introduce the concept that heritage assets can be harmed or lost through alteration, destruction or development within their setting. This harm ranges from less than substantial through to substantial. With regard to designated assets, paragraph 199 states that great weight should be placed on its conservation, irrespective of whether any potential harm is considered to be substantial or less than substantial. The paragraph goes further to say that the more important the asset, the greater the weight should be on its conservation. In paragraph 200, a distinction is made in respect of those assets of the highest significance (e.g., scheduled monuments, Grade I and Grade II* listed buildings) where substantial harm to or loss should be wholly exceptional.</i></p>	<p>Based on the current design, there are no physical impacts predicted on designated assets. An initial assessment of likely significant effects has been undertaken in accordance with the methodology set out in section 2.4.4 and is reported in Preliminary Assessment of Effects' Section 2.4.9). The full detailed impact assessment will form part of the final ES</p>
<p><i>Paragraph 201 states that in instances where development would cause substantial harm to or total loss of significance of a designated asset, consent should be refused unless it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh that harm or loss. Paragraph 202 says in instances where development would cause less than substantial harm to the significance of a designated asset, the harm should be weighed against the public benefits of the proposal to provide a balanced judgement.</i></p>	<p>Based on the current design, there are currently no situations where the Suffolk Onshore Scheme would result in substantial harm to a designated asset (see Preliminary Assessment of Effects' section 2.4.9). The full detailed impact assessment will form part of the final ES.</p>
<p><i>With regard to non-designated assets, paragraph 203 states that the effect of the application on the significance of the asset should be considered in determining the application. A balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.</i></p>	<p>An initial assessment of significance, as well as the setting of assets, has been undertaken as part of the PEIR process (Preliminary Assessment of Effects' Section 2.4.9). The full detailed impact assessment will form part of the final ES.</p>

## National Planning Practice Guidance

- 2.4.2.12 The Planning Practice Guidance (PPG) (Ref 2.4.8) provides further advice and guidance that expands the policy outlined in the NPPF. It expands on terms such as 'significance' and its importance in decision making. The PPG clarifies that being able to properly assess the nature, extent and the importance of the significance of the heritage asset and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals (paragraph 008 Document Reference ID: 18a-008-20190723).
- 2.4.2.13 The PPG states that in relation to setting, a thorough assessment of the impact on setting needs to take in to account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it (paragraph 009 Document Reference ID: 18a-009-20190723). The setting of the heritage asset is also of importance and a thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which the proposed changes enhance or detract from that significance and the ability to appreciate it. The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which an asset is experienced in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.
- 2.4.2.14 Paragraph 013 of the PPG recognises that the contribution that setting makes to the significance of the heritage asset does not depend on there being public right or the ability to experience that setting. When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change (Paragraph: 013 Document Reference ID: 18a-013-20190723 Revision date: 23 07 2019).
- 2.4.2.15 The PPG discusses how to assess if there is substantial harm. It states that what matters in assessing if a proposal causes substantial harm is the impact on the significance of the asset. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed (paragraph 017). Generally, harm to heritage assets can be avoided or minimised if proposals are based on a clear understanding of the heritage asset and its setting (paragraph 008 Document Reference ID: 18a-008-20190723). The NPPF indicates that the degree of harm should be considered alongside any public benefits that can be delivered by development. The PPG states that these benefits should flow from the Proposed Scheme and should be of a nature and scale to be of benefit to the public and not just a private benefit and would include securing the optimum viable use of an asset in support of its long-term conservation (paragraph 020 Document Reference ID: 18a-020-20190723).

## Local Planning Policy

- 2.4.2.16 The Suffolk Onshore Scheme lies within the jurisdiction of Suffolk County Council. The following planning policies which are relevant to the study of cultural heritage and has informed the assessment of preliminary effects in this chapter are as follows:
- Suffolk Coastal Local Plan [adopted in September 2020] [Ref 2.4.9];
  - Historic Environment: Supplementary Planning Document [Ref 2.4.11].

- 2.4.2.17 The Suffolk Onshore Scheme Boundary (refer to **Figure 1.1.2 Suffolk Onshore Scheme Boundary**) lies within the jurisdiction of East Suffolk Council. Local planning policy for East Suffolk Council consists of two parts; the Suffolk Coastal Local Plan (Ref 2.4.9) and the Waveney Local Plan (Ref 2.4.10) (which covers the former Suffolk Coastal and Waveney Districts).
- 2.4.2.18 The Suffolk Onshore Scheme Boundary lies within the boundary of the Suffolk Coastal Local Plan (adopted September 2020) (Ref 2.4.9). Local Plan policies which are relevant to cultural heritage matters and will inform the ES are detailed in Table 2.4.4.

Table 2.4.4 Local Planning Policies relevant to cultural heritage

Suffolk Coastal Local Plan – Policy	Where this is covered in the PEIR
<p>SCLP10.4: Landscape Character</p> <p>While principally a policy dealing with the natural environment, the policy also covers manmade features that contribute to the significance/character of an area, and that are identified in the Landscape Character Assessment</p>	<p>Potential impacts on the historic environment have been considered and are reported within the preliminary assessment presented in section 2.4.9. The full detailed impact assessment will form part of the final ES. This will be undertaken in consultation with the LVIA team as well as heritage stakeholders to identify ‘Historic Landscapes’ that should be considered</p>
<p>SCLP11.1: Design Quality</p> <p>This policy details the importance of input into the design of developments to take into account elements such as important landscape features, architectural distinctiveness of an area, and the character of an area.</p>	<p>Consultation is ongoing with the design/engineering team to develop a design for the major above ground infrastructure that will remove/reduce the potential for impacts on the setting of assets or the character of an area.</p>
<p>SCLP11.3: Historic Environment</p> <p>Policy deals with working with developers to conserve and enhance the historic environment. Notes that NPPF will be applied in respect of designated and non-designated assets. Recommends that pre-application consultation is undertaken with the Council to agree the scope of heritage assessment required.</p>	<p>Potential impacts on the historic environment have been considered and are reported within the preliminary assessment presented in section 2.4.9. The full detailed impact assessment will form part of the final ES. This will also detail situations where conservation and enhancement have been possible. Consultation undertaken to date is detailed</p>

Suffolk Coastal Local Plan – Policy	Where this is covered in the PEIR
<p>SCLP11.4: Listed Buildings</p> <p>Policy deals with both physical impacts and changes to the setting of listed buildings.</p>	<p>in 2.4.3, and the consultation process will continue as the final ES is progressed.</p> <p>Potential impacts on the setting of Listed Buildings have been considered and are reported within the preliminary assessment of effects' section 2.4.9 ). The full detailed impact assessment will form part of the final ES.</p>
<p>SCLP11.5: Conservation Areas</p> <p>Policy deals with development within, or which has the potential to affect the setting of, Conservation Areas.</p>	<p>Potential impacts on Conservation Areas have been considered and are reported within the preliminary assessment of effects' section 2.4.9 ). The full detailed impact assessment will form part of the final ES.</p>
<p>SCLP11.6: Non-Designated Heritage Assets</p> <p>Policy covers the reuse or removal of non-designated heritage assets. The policy notes that consent to demolish/remove a feature will be based on elements such as structural integrity and economic viability of repair, as well as the heritage value/significance.</p>	<p>Potential impacts on Non-Designated Assets have been considered and are reported within the preliminary assessment of effects' section 2.4.9 ). The full detailed impact assessment will form part of the final ES.</p>
<p>SCLP11.7: Archaeology</p> <p>Policy requires an archaeological assessment proportionate to the potential and significance of remains must be included with any planning application. Notes a preference for '<i>preservation in situ</i>' and notes the need for a full mitigation strategy to be developed if preservation is not achievable.</p>	<p>Potential impacts on Archaeology have been considered and are reported within the preliminary assessment of effects' section 2.4.9 ). The full detailed impact assessment will form part of the final ES.</p>
<p>SCLP11.8: Parks and Gardens of Historic Landscape Interest</p> <p>Policy relates to the potential for impacts on Registered Parks and Gardens identified as Designated Assets within NPPF, as well as parks and gardens recorded by East Suffolk Council as being of significance.</p>	<p>While no Registered Parks and Gardens, Carlton Hall (on the East Suffolk Council list of parks and gardens) is located to the north of the Draft Order Limits. Impacts on this asset will be assessed as part of the final ES if the northern section of</p>



Suffolk Coastal Local Plan – Policy	Where this is covered in the PEIR
	the Draft Order Limits are taken forwards.

2.4.2.19 Additional planning guidance documents relevant to cultural heritage matters consists of the East Suffolk Council Historic Environment Supplementary Planning Document (SPD) (Ref 2.4.11). The SPD is designed to “assist in the implementation of policies detailed in the Local Plans and Neighbourhood Plans for East Suffolk regarding the historic environment, and as an SPD this guidance is a material consideration in determining applications for planning permission and listed building Consent”.

2.4.2.20 The document also notes: “This document provides important information and advice concerning the conservation and enhancement of the historic environment, in relation to any proposal potentially affecting the significance of a heritage asset. Although listed buildings and conservation areas carry special statutory protections, as detailed in the Legal Framework section below, registered and locally listed historic parks and gardens and other non-designated heritage assets also have heritage value worthy of protection. The guidance within this document may also be relevant in respect of development to unlisted buildings of no particular heritage value on their own, due to the affect that such development may have on a nearby heritage asset. Having a wider acknowledgement and understanding of the value of East Suffolk's heritage and the policies of the Local Plans will help to ensure that development conserves and where possible enhances the historic environment. The information and advice contained in this document is of a general nature and that its applicability will vary according to circumstances” .

## 2.4.3 Scoping Opinion and Consultation

### Scoping

2.4.3.1 A Scoping Report (Ref 2.4.12) for the Proposed Project was issued to the Planning Inspectorate (PINS) on 24 October 2022 and a Scoping Opinion (Ref 2.4.13) was received from the Secretary of State (SoS) on 1 December 2022. Table 2.4.5 sets out the comments raised in the Scoping Opinion in relation to cultural heritage and how these have been addressed in this PEIR or will be addressed within the ES. The Scoping Opinion takes account of responses from prescribed consultees as appropriate.

Table 2.4.5 Comments raised in the Scoping Opinion

ID	Inspectorate’s comments	Response
3.3.1	<p>[Physical impacts on non-designated assets (maintenance and decommissioning)]</p> <p>The ES should clearly state the approach to non-designated assets encountered during construction, such as whether preservation in-situ is proposed, and confirm where non-designated assets</p>	<p>A programme of investigations, commencing with geophysical survey to be followed by evaluation trenching, will aim to identify previously unrecorded heritage assets and explore the potential to mitigate</p>

ID	Inspectorate's comments	Response
	<p>have been preserved in situ. The ES should consider the potential for effects on non-designated assets during the maintenance and decommissioning stage, where likely significant effects could occur.</p>	<p>impacts through design (i.e., avoiding non-designated assets). Where assets cannot be avoided, a robust mitigation strategy will be developed in consultation with heritage stakeholders in advance of construction. This is likely to include, but not be limited to, archaeological excavation and recording.</p> <p>The potential for physical impacts from the maintenance and decommissioning phases on assets preserved in situ during construction will be considered within the ES as necessary.</p>
3.3.2	<p><i>[Temporary impacts on the setting of heritage assets resulting from plant/machinery (maintenance and decommissioning)]</i></p> <p>The Inspectorate agrees that settings effects on heritage assets arising from the presence of plant and machinery during the maintenance phase can be scoped out of the assessment on the basis of the likely small scale and temporary nature of likely maintenance and decommissioning activities.</p>	<p>Temporary impacts on setting resulting from maintenance have been scoped out of the assessment.</p>
3.3.3	<p><i>[Temporary impacts on the setting of heritage assets from construction compounds introducing light and noise pollution (decommissioning)]</i></p> <p>The Inspectorate agrees that impacts on the setting of heritage assets from construction compounds introducing light and noise pollution during the decommissioning stage are likely to be small scale and of a temporary nature, and thus this matter can be scoped out of the assessment.</p>	<p>Temporary impacts on setting resulting from decommissioning have been scoped out of the assessment.</p>
3.3.4	<p><i>[Study area]</i></p> <p>Noting that the proposed study area is to be refined during the assessment process, the study area should be determined using the ZOI from the</p>	<p>The Zone of Influence (ZOI) has been established in consultation with the Landscape and Visual Impact Assessment (LVIA) team as</p>

ID	Inspectorate's comments	Response
	Proposed Development, to ensure that all heritage assets likely to be significantly affected by the Proposed Development have been included in the assessment. This should include consideration of those assets that contribute to setting.	well as stakeholders including Historic England and Suffolk County Council. Assets taken forwards to examine/assess potential impacts on setting were agreed through the consultation process.
3.3.5	<p data-bbox="411 479 699 524"><i>[Heritage receptors]</i></p> <p data-bbox="411 524 1007 981">The Applicant's attention is directed to the comments of East Suffolk Council and Friston Parish Council at Appendix 2 to this Opinion, which identify additional heritage assets to be considered in the setting assessment. The Applicant should seek to agree the heritage receptors to be included within the heritage assessment with relevant consultation bodies and include an assessment on these receptors, where significant effects are likely to occur.</p>	<p data-bbox="1038 479 1465 860">Ongoing consultation is being undertaken with stakeholders including Suffolk Council, East Suffolk Council and Historic England to agree assets which should be included in the assessment of impacts on setting. These are covered in the preliminary assessment.</p> <p data-bbox="1038 860 1465 1451">The comments made by Friston Parish Council have also been considered and impacts on the setting of Wood Farm is considered as part of the assessment. In relation to the comments regarding impacts resulting from maintenance and decommissioning raised by Friston Parish Council; the Inspector has agreed that these can be scoped out of the assessment and therefore they will not be included in the ES.</p>
3.3.6	<p data-bbox="411 1464 906 1541"><i>[Sources of construction impacts – groundwater]</i></p> <p data-bbox="411 1541 1007 1877">The ES should consider and assess effects to archaeological receptors resulting from impacts to groundwater levels from the Proposed Development, where likely significant effects could occur. The ES should include suitable cross-references between the Cultural Heritage and the Geology and Hydrogeology aspect chapter.</p>	<p data-bbox="1038 1464 1465 1832">Consideration of effects to archaeological receptors as a result of potential changes to groundwater levels will be considered in consultation with the authors of the Geology and Hydrogeology assessment and reported, where relevant, within the final ES.</p>
3.3.7	<p data-bbox="411 1890 943 1957"><i>[Proposed assessment methodology]</i></p> <p data-bbox="411 1957 1007 2074">The Inspectorate notes that the need for any additional survey work will be determined following the desk-based</p>	<p data-bbox="1038 1890 1465 2074">The preparation of a draft WSI covering further archaeological works required will be undertaken as part of the ES process.</p>

ID	Inspectorate's comments	Response
	assessment (DBA). Investigative works should be accompanied by a Written Scheme of Investigation (WSI), it is recommended that a draft WSI be provided with the ES. The Applicant is advised to seek to agree the scope of the site investigations and WSI with relevant consultation bodies, including the Local Authority and Historic England.	The draft WSI will be prepared in consultation with heritage stakeholders including Historic England and Suffolk County Council archaeologist.
3.3.8	[ <i>Assessment methodology – heritage value</i> ] Table 2.4.9 determining significance of effect includes for a heritage value of 'Very High'; however, Table 2.4.7 used to define heritage value only includes up to a value of 'high'. The ES should provide a clear explanation of the assessment methodology applied.	Methodology section and matrix updated to remove the 'very high' level and now uses 'high' as per the terminology in NPPF. (See methodology section 2.4.4).

2.4.3.2 The scope of the Cultural Heritage assessment remains as established in the Scoping Report.

## Consultation and Project Engagement

2.4.3.3 Consultation has been undertaken with heritage stakeholders (including Historic England, Suffolk County Council, and East Suffolk Council) in the form of thematic group meetings, as well as separate discussions to agree the archaeological scope of works associated with geotechnical Ground Investigation (GI) works linked to the engineering component of the Proposed Project.

2.4.3.4 Discussions regarding the proposed GI works have resulted in elements of work being moved to remove potential physical impacts on known archaeological remains, as well as agreeing archaeological monitoring of trial pits.

2.4.3.5 Consultation has also included discussions regarding the potential impacts on the setting of heritage assets resulting from the construction of the Saxmundham Converter Station. This has included the identification of assets which should be taken to full assessment, as well as possible locations for viewpoint photography.

2.4.3.6 Finally, discussions have commenced with relevant stakeholders regarding works required to inform the ES process. This will initially include geophysical survey of the draft Order Limits. It is anticipated this would be followed by evaluation trenching for which areas of high risk and archaeological potential are being agreed. As part of these discussions, Suffolk County Council noted that they consider the multi-period site at Gorse Hill to be of high archaeological value (i.e., of national significance).

2.4.3.7 Consultation with relevant stakeholders will continue as required post submission of the PEIR.

## 2.4.4 Approach and Methodology

2.4.4.1 **Volume 1, Part 1, Chapter 5: PEIR Approach and Methodology** sets out the overarching approach which has been used in developing the preliminary environmental information. This section describes the technical methods used to determine the baseline conditions, sensitivity of the receptors and magnitude of effects and sets out the significance criteria that have been used for the preliminary cultural heritage assessment.

### Guidance Specific to the Cultural Heritage Assessment

2.4.4.2 The preliminary cultural heritage assessment has been carried out in accordance with various good practice guidance documents relevant to heritage.

2.4.4.3 Historic England has published a series of Good Practice Advice (GPA) of which those of most relevance to this appraisal are GPA2 - Managing Significance in Decision-taking (Ref 2.4.14) and GPA3 - The Setting of Heritage Assets (2nd Edition) (Ref 2.4.15).

2.4.4.4 GPA2 emphasises the importance of having a knowledge and understanding of the significance of heritage assets likely to be affected by the development and that the *“first step for all applicants is to understand the significance of any affected heritage asset and, if relevant the contribution of its setting to its significance”* (paragraph 4). Early knowledge of this information is also useful to a local planning authority in pre-application engagement with an applicant and ultimately in decision making (paragraph 7).

2.4.4.5 GPA3 provides advice on the setting of heritage assets. Setting is as defined in the NPPF and comprises the surroundings in which a heritage asset is experienced. Elements of a setting can make positive or negative contributions to the significance of an asset and affect the ways in which it is experienced. Historic England state that setting does not have a boundary and what comprises an asset’s setting may change as the asset and its surrounding evolve. Setting can be extensive and, particularly in urban areas or extensive landscapes, can overlap with other assets. The contribution of setting to the significance of an asset is often expressed by reference to views and the GPA in paragraph 11 identifies those views such as those that were designed or those that were intended, that contribute to understanding the significance of assets.

2.4.4.6 Historic England has also produced a number of ‘Historic England Advice Notes’ (HEANs) covering various planning topics. Most relevant are HEAN2 – Making Changes to Heritage Assets (Ref 2.4.16) and HEAN 12 – Statements of Heritage Significance (Ref 2.4.17).

2.4.4.7 The baseline study has been undertaken in accordance with guidance published by the Chartered Institute for Archaeologists (CIfA), specifically the standard and guidance for historic environment desk-based assessment (Ref 2.4.18).

## Baseline Data Gathering and Forecasting Methods

- 2.4.4.8 The main data sets that have been utilised for the Cultural Heritage Assessment to date are the Historic England National Heritage List for England for designated assets, and the Suffolk HER for non-designated assets. Designated heritage assets are referenced with their National Heritage List for England reference number, and each asset has been cross-referenced to the gazetteer in **Volume 2, Part 2, Appendix 2.4.A: Cultural Heritage Gazetteer**. Non-designated assets are referenced using the Suffolk HER unique identifier number. These are pre-fixed with (MSF or MXS). Each non-designated asset has been cross-referenced to the gazetteer in **Volume 2, Part 2, Appendix 2.4.A: Cultural Heritage Gazetteer**.
- 2.4.4.9 The ES will be further informed by results of other data gathering exercises that are currently being undertaken or are proposed before the submission of the ES. These include a review of aerial photographs and LiDAR data<sup>1</sup>, geophysical survey, archaeological walkover survey, documentary research (including a map regression exercise), and archaeological monitoring of Ground Investigation works.

## Assessment Criteria

### Sensitivity

- 2.4.4.10 The sensitivity of a heritage asset (its heritage value) is guided by its designated status but is derived also from its heritage interest which may be archaeological, architectural, artistic or historic (NPPF Annex 2, Glossary) (Ref 2.4.19). Each identified heritage asset can be assigned a value in accordance with the criteria set out in Table 2.4.6 which is based on the distinctions presented in the NPPF (Ref 2.4.8). Using professional judgement and the results of consultation with relevant stakeholders, heritage assets are also assessed on an individual basis and regional variations and individual qualities are taken into account where applicable. This includes aspects such as the regional scarcity of specific asset type, or whether assets can be considered to be of schedulable quality due to them being of national importance.

Table 2.4.6 Criteria for assessing the sensitivity (value) of heritage assets

Sensitivity (value)	Asset categories
High	World Heritage Sites. Scheduled Monuments. Grade I and II* listed buildings. Registered battlefields. Grade I and II* registered parks and gardens. Conservation areas of demonstrable high value. Non-designated heritage assets (archaeological sites, historic buildings,

<sup>1</sup> Lidar, which stands for Light Detection and Ranging, is a remote sensing method that uses light in the form of a pulsed laser to measure ranges (variable distances) to the Earth. This form of remote sensing can, when undertaken at high resolution, detect very slight changes in the ground surface, making it possible to detect features almost invisible to the naked eye.

	<p>monuments, parks, gardens or landscapes) that can be shown to have demonstrable national or international importance.</p> <p>Well preserved historic landscape character areas, exhibiting considerable coherence, time-depth or other critical factor(s).</p>
Medium	<p>Grade II listed buildings.</p> <p>Conservation areas.</p> <p>Grade II registered parks and gardens.</p> <p>Non-designated heritage assets (archaeological sites, historic buildings, monuments, park, gardens or landscapes) that can be shown to have demonstrable regional importance.</p> <p>Averagely preserved historic landscape character areas, exhibiting reasonable coherence, time-depth or other critical factor(s).</p> <p>Historic townscapes with historic integrity in that the assets that constitute their make-up are clearly legible.</p>
Low	<p>Locally listed buildings.</p> <p>Non-designated heritage assets (archaeological sites, historic buildings, monuments, park, gardens or landscapes) that can be shown to have demonstrable local importance.</p> <p>Historic landscape character areas whose value is limited by poor preservation and/ or poor survival of contextual associations.</p>
Negligible	<p>Assets identified on national or regional databases, but which have no archaeological, architectural, artistic or historic value.</p> <p>Assets whose values are compromised by poor preservation or survival of contextual associations to justify inclusion into a higher grade.</p> <p>Landscape with no or little significant historical merit.</p>

### Magnitude

2.4.4.11 Having identified the sensitivity (value) of the heritage asset, the next stage in the assessment is to identify the level and degree of impact to an asset arising from the

Proposed Project. Impacts may arise during construction or operation, as well as from the maintenance and decommissioning phases, and can be temporary or permanent. Impacts can occur to the physical fabric of the asset or affect its setting.

- 2.4.4.12 The level and degree of impact (the impact magnitude) is assigned with reference to a four-point scale as set out in Table 2.4.7. In respect of cultural heritage an assessment of the magnitude of impact is made in consideration of any Proposed Project mitigation measures (including embedded measures, control and management measures). If no impact on value is identified, no impact rating is given, and no resulting effect reported.

Table 2.4.7 Factors influencing the assessment of magnitude of impacts.

Impact rating	Description of impact
Large	Changes such that the heritage value of the asset is totally altered or destroyed. Comprehensive change to elements of setting that would result in harm to the asset and our ability to understand and appreciate its heritage significance.
Medium	Change such that the heritage value of the asset is significantly altered or modified. Changes such that the setting of the asset is noticeably different, affecting significance and resulting in changes in our ability to understand and appreciate the heritage value of the asset.
Small	Changes such that the heritage value of the asset is slightly affected. Changes to the setting that have a slight impact on significance resulting in changes in our ability to understand and appreciate the heritage value of the asset.
Negligible	Changes to the asset that hardly affect heritage value. Changes to the setting of an asset that have little effect on significance and no real change in our ability to understand and appreciate the heritage value of the asset.

### Significance of effects

- 2.4.4.13 As set out in **Volume 1, Part 1, Chapter 5: PEIR Approach and Methodology** the general approach taken to determining the significance of effect in this preliminary assessment is only to state whether effects are likely or unlikely to be significant, rather than assigning significance levels.
- 2.4.4.14 Assessment of the significance of effect to known heritage assets takes into account the significance of the physical fabric as well as the contribution made by its setting.



This is weighed against the impact on that significance, taking into account the scale that the identified impact matters when placing it within its national, regional or local context. The assessment of the archaeological potential draws on three factors:

- An assessment of the potential for the survival of archaeological deposits within the site based on an evaluation of previous ground disturbance;
- An assessment of the potential for archaeological deposits to exist within the site based on the results of the baseline study; and
- An assessment of the significance of known and potential archaeological assets within the site, as well as within the defined study area.

2.4.4.15 The level of disturbance to buried archaeological remains caused by previous development has been assessed based on available data listed above, with particular attention paid to previous archaeological evaluations and excavations in the study area.

2.4.4.16 The potential for an area to contain archaeological remains is rated ‘high’, ‘medium’, ‘low’, ‘negligible’, or ‘unknown’. This rating is based on an understanding of the archaeological resource as a whole and its national, regional and local context. This includes the number, proximity and significance of known and predicted archaeological/historical sites or find spots within the site and its surrounding study area.

2.4.4.17 An assessment to classify the effect on heritage assets, having taken into consideration mitigation measures, is determined using the matrix at Table 2.4.8, which takes account of the value of the asset (Table 2.4.6) and the magnitude of impact (Table 2.4.7). Effects can be neutral, adverse or beneficial.

Table 2.4.8 Criteria for assessing the significance of heritage assets

Heritage sensitivity (value)	Magnitude of impact			
	Large	Medium	Small	Negligible
High	Major	Major	Moderate	Minor
Medium	Major	Moderate	Minor	Minor
Low	Moderate	Minor	Minor	Negligible
Negligible	Neutral	Neutral	Neutral	Neutral

2.4.4.18 The chapter reports on the significance of effect in accordance with **Volume 1, Part 1, Chapter 5: PEIR Approach and Methodology**. Major and moderate effects are considered to be significant. Within the NPPF, impacts affecting the value of heritage assets are considered in terms of ‘harm’ and there is a requirement to determine whether the level of harm amounts to ‘substantial harm’ or ‘less than substantial harm’. There is no direct correlation between the significance of effect as reported in this preliminary assessment and the level of harm caused to heritage significance. A major (significant) effect on a heritage asset would, however, more often be the basis by which to determine that the level of harm to the significance of the asset would be substantial. A moderate (significant) effect is unlikely to meet the test of substantial

harm and would therefore more often be the basis by which to determine that the level of harm to the significance of the asset would be less than substantial. A minor or negligible (not significant) effect would still amount to a less than substantial harm and would therefore still trigger the statutory presumptions against development within s.66 of the Listed Buildings Act 1990; however, a neutral effect is classified as no harm. In all cases determining the level of harm to the significance of the asset arising from development is one of professional judgement.

## Assumptions and Limitations

- 2.4.4.19 The preliminary assessment reported in this chapter has relied upon data and records provided by third parties, and therefore it has been assumed that this information is accurate and up to date at the time of reporting.
- 2.4.4.20 The assessment has been undertaken using the available design information for the Proposed Project and the maximum likely extents of land required for its construction, operation and maintenance (see section 2.4.5).
- 2.4.4.21 Only limited areas of the draft Order Limits had been subject to archaeological walkover survey at the time of writing. Likewise, geophysical survey has not been undertaken but this is due to commence Autumn 2023.

## 2.4.5 Basis of Assessment

- 2.4.5.1 This section sets out the assumptions that have been made in respect of design flexibility maintained within the Proposed Project and the consideration that has been given to alternative scenarios and the sensitivity of the preliminary assessment to changes in the construction commencement year.
- 2.4.5.2 Details of the available flexibility and assessment scenarios are presented in **Volume 1, Part 1, Chapter 4: Proposed Project Description** and **Volume 1, Part 1, Chapter 5 PEIR: Approach and Methodology**.

## Flexibility Assumptions

- 2.4.5.3 The main preliminary assessments have been undertaken based on the description of the Proposed Project provided in **Volume 1, Part 1, Chapter 4: Description of the Proposed Project**. To take account of the flexibility allowed in the Proposed Project, consideration has been given to the potential for preliminary effects to be of greater or different significance should any of the permanent or temporary infrastructure elements be moved within the Limits of Deviation (LoD) or draft Order Limits.
- 2.4.5.4 The assumptions made regarding the use of flexibility for the main assessment, and any alternatives assumptions are set out in Table 2.4.9 below. Should the flexibility assumptions alter the results of the preliminary assessment of effects, this has been noted within the preliminary assessment section (see section 2.4.9).

Table 2.4.9 Flexibility Assumptions

<b>Element of flexibility</b>	<b>Proposed Project assumption for initial preliminary assessment</b>	<b>Flexibility assumption considered</b>
Lateral LoD HVDC/HVAC cables	HVDC cables laid anywhere within the lateral LoD.	The maximum flexibility has been assessed under the preliminary assessment (ie the potential for impacts on any assets within the LoD have been assessed).
Lateral LoD Saxmundham Converter Station	Saxmundham Converter Station to be constructed anywhere within the lateral LoD.	The maximum flexibility has been assessed under the preliminary assessment (ie the potential for impacts on any assets within the LoD have been assessed).
Vertical LoD Saxmundham Converter Station	Assumed maximum height of Saxmundham Converter Station will not exceed 26 m.	The maximum flexibility has been assessed under the preliminary assessment (ie the assessment is based on a worst case scenario where the converter station is 26 m high).

## Consideration of Scenarios and Options

2.4.5.5 There are three scenarios which have been considered by the preliminary assessment. These are:

- Friston Substation is installed either under the current consent sought by Scottish Power Renewables (SPR) or as part of the Proposed Project, as explained in **Volume 1, Part 1, Chapter 4: Description of the Proposed Project**; and
- Saxmundham Converter Station construction access is taken off the B1121 South Entrance (bellmouth BM09) or the B1121 Main Road (bellmouth BM12 via BM-11 and BM10), as explained in **Volume 1, Part 1, Chapter 4: Description of the Proposed Project**;
- Saxmundham Converter Station permanent access is taken off the B1121 South Entrance (bellmouth BM09), B1121 Main Road (bellmouth BM12 via BM-11 and BM10) or off the B1121 The Street (bellmouth BM13), as explained in **Volume 1, Part 1, Chapter 4: Description of the Proposed Project**.

2.4.5.6 Table 2.4,10 details where these scenarios are relevant to the preliminary archaeology and cultural heritage assessment and how they have been assessed and reported in section 2.4.9, preliminary assessment of effects. Should the consideration of the above scenarios and options alter the results of the preliminary assessment of effects, this has been noted within the preliminary assessment section (see section 2.4.9).

Table 2.4,10 Consideration of Scenarios

<b>Assessment scenario</b>	<b>How it has been considered within the preliminary assessment</b>
Friston substation	The potential for both direct and indirect impacts on cultural heritage resulting from construction under the current SPR consent or as part of the Proposed Project have been considered as part of the PEIR

<b>Assessment scenario</b>	<b>How it has been considered within the preliminary assessment</b>
	process (Preliminary Assessment of Effects' Section). The full detailed impact assessment will form part of the final ES.
Saxmundham Converter Station construction access	The potential for both direct and indirect impacts on cultural heritage resulting from the two Converter Station accesses' scenarios have been considered as part of the PEIR process (Preliminary Assessment of Effects' Section). The full detailed impact assessment will form part of the final ES.
Saxmundham Converter Station permanent access	The potential for both direct and indirect impacts on cultural heritage resulting from the permanent access options have been considered as part of the PEIR process (Preliminary Assessment of Effects' Section). The full detailed impact assessment will form part of the final ES.

## Coordination including Co-location

- 2.4.5.7 The Proposed Project includes an option for co-location with National Grid Ventures proposed Nautilus and LionLink (formally known as EuroLink) interconnector projects as explained in **Volume 1, Part 1, Chapter 5: PEIR Approach and Methodology**.
- 2.4.5.8 Table 2.4.11 details where the option of co-location is relevant to the preliminary cultural heritage assessment and how this option has been assessed and reported in section 2.4.9, preliminary assessment of effects.

Table 2.4.11 Consideration of Co-location

<b>Element of co-location</b>	<b>How it has been considered within the preliminary assessment</b>
HVDC ducts	The HVDC ducts have been considered as part of the Proposed Project and the Proposed Project with co-location within the preliminary assessment. The maximum working width for the HVDC corridor has been assessed for the Proposed Project at 40 m and the maximum working width for the HVDC corridor has been assessed for the Proposed Project with co-location at up to 69 meters (m).
HVAC ducts	The HVAC ducts have been considered as part of the Proposed Project and the Proposed Project with co-location within the preliminary assessment. The maximum working width for the HVAC corridor has been assessed for the Proposed Project at 63 m and the maximum working width for the HVAC corridor has been assessed for the Proposed Project with co-location at up to 131 m.
Saxmundham Converter Station	The potential for both direct and indirect impacts on cultural heritage resulting from the Converter Station as part of the Proposed Project and the Proposed Project with co-location have been considered as part of the PEIR process (Preliminary Assessment of Effects' Section). The full detailed impact assessment will form part of the final ES.
Friston Substation	No option has been included for co-location as part of the Proposed Project. This is assessed cumulatively in <b>Volume 1,</b>

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## Part 2, Chapter 14: Suffolk Onshore Scheme Inter-Project Cumulative Effects.

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Suffolk landfall	The potential for direct impacts on cultural heritage at the landfall as part of the Proposed Project and the Proposed Project with co-location have been considered as part of the PEIR process (Preliminary Assessment of Effects' Section). The full detailed impact assessment will form part of the final ES.
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### Sensitivity Test

It is likely that under the terms of the draft DCO, construction could commence in any year up to five years from the granting of the DCO which is assumed to be 2026. Consideration has been given to whether the preliminary effects reported would be any different if the works were to commence in any year up to year five. Where there is a difference this is reported in section 2.4.9, preliminary assessment of effects.

### 2.4.6 Study Area

2.4.6.1 The study area is the area within which cultural heritage assets may experience effects as a result of the Suffolk Onshore Scheme during construction, maintenance, operation and decommissioning. Effects to heritage assets may arise as a result of physical impacts to their fabric or through changes to their setting.

2.4.6.2 For the purpose of this report, a 500 m buffer was applied to the Suffolk Onshore Scheme Boundary (see **Figure 1.1.2 Suffolk Onshore Scheme Boundary**), which includes the proposed cable route and other associated works, as the study area to capture information relating to archaeology and cultural heritage. The extent of the proposed study area is the standard for these types of projects, and considered appropriate in this case, in order to provide the necessary context for establishing the cultural heritage baseline and identifying likely impacts and effects arising from the Suffolk Onshore Scheme and was agreed as part of the Scoping exercise.

2.4.6.3 A second wider study area of 2 km, as set out at scoping based on the ZTV and ZOI, was applied to the area around permanent above ground infrastructure (i.e., Saxmundham Converter Station and Friston Substation) in order to provide an initial assessment of potential setting impacts on designated assets. This review of assets was undertaken alongside a review of the ZTV produced for the Suffolk Onshore Scheme (**Figure 2-4-2 Designated assets within the 2 km study area with the Zone of Theoretical Visibility (ZTV) for the Proposed Project**), as well as consultation with stakeholders.

### 2.4.7 Baseline Conditions

2.4.7.1 The cultural heritage baseline described in this section has been informed by the following data sources (see **Figure 2-4-1** and **Volume 2, Part 2, Appendix 2.4.A: Cultural Heritage Gazetteers** for a list of all assets within the 500m study area):

- National Heritage List for England dataset;
- Suffolk Historic Environment Record (HER);

- Data collected as part of other schemes in the area including geophysical survey data and evaluation reports produced as part of the SPR East Anglia 1 and East Anglia 2 projects (Ref 2.4.20, Ref 2.4.21, Ref 2.4.22); and
  - Other readily available online sources.
- 2.4.7.2 A review of aerial photographic and LiDAR data will be undertaken, as well as geophysical survey of the draft Order Limits. This information, as well as that gathered from a review of historic mapping and walkover survey, as well as archaeological monitoring of GI works and evaluation trenching, will form part of the detailed desk-based assessment which will form part of the final ES.
- 2.4.7.3 Twenty-three designated assets have been recorded within the study area, including three Grade II\* listed buildings and twenty Grade II listed buildings. The Grade II\* listed buildings recorded within the study area include Church of Saint John Baptist (126184), Church of Saint Mary Magdalene (1278252) and The Beeches Including Stable Block (1365996). The remaining Grade II listed buildings are farmsteads, former farms or houses, examples of which are High House Farm (1216049), Church House (1268183) and Pattle's Farmhouse (1287772).
- 2.4.7.4 The majority of the Grade II listed buildings are located within the settlements which surrounds the Suffolk Onshore Scheme, with concentrations in Leiston, Aldeburgh, Thorpeness, Aldringham, Friston, Sternfield and Saxmundham. Aldeburgh, Thorpeness, Leiston, and Saxmundham are also conservation areas.
- 2.4.7.5 A number of Grade II Listed Buildings are also located in more rural settings outside of the main settlements. These are largely farmhouses, or former farmhouses and agricultural buildings.
- 2.4.7.6 A review of non-designated assets recorded on the Suffolk HER revealed a large number of heritage assets demonstrating evidence of human activity in the area from the early prehistoric period through to the modern period (see **Volume 2, Part 2, Appendix 2.4.A: Cultural Heritage Gazetteers** for the full list of non-designated assets, note the gazetteer also provides details of which assets fall within the Suffolk Onshore Scheme Boundary, as well as those that are within the study area).
- 2.4.7.7 Some of the earliest material identified includes a Neolithic flint axe recorded on the Dunwich shore (MSF1997), microliths dating to the Mesolithic/Neolithic periods recorded near Chapel Barn Farm, Aldeburgh (MSF34410) and a flint scatter of flakes and scrapers dating from the Neolithic period recorded at Gorse Hill (MSF2532). Bronze Age activity recorded has been attributed settlement activity such as pit clusters at Land East of Warren Hill (MSF34332) and Church Hill (MSF25251), and burial practises such as a possible ring barrow (MSX18777) recorded between Grange Farm and Valley Grange.
- 2.4.7.8 The Neolithic remains encountered at Gorse Hill (MSF2532) represent some of the earliest remains in an area where material also dating to the Iron Age, Roman, and medieval period has been noted (MSF2524; MSF2538; MSF2539; MSF2543; MSF2552; MSF33592; MXS19741), and while detailed excavations have been limited, the remains encountered to date suggest a landscape exploited from the Neolithic period onwards.
- 2.4.7.9 The Iron Age is better represented with a number of cropmarks recorded through aerial photography suggesting extensive field systems and settlement activity dating from the Iron Age, and recent excavations undertaken as part of other infrastructure projects have also demonstrated extensive human activity throughout the Iron Age and Roman

period (Ref 2.4.20, Ref 2.4.21, Ref 2.4.22). It is also possible that some of the undated cropmarks have earlier origins and date to the Bronze Age.

- 2.4.7.10 There is evidence of early medieval sites within the study area, however it is possible that many of the settlements that survive in the wider area have their origins in the early medieval period also, and as a result remains dating to this period could lie beneath the more built-up areas. Settlement activity has been recorded at 'Land East of Warren Hill' (MSF34332) and 'Land North East of Street Farm' (MSF37035) which are both located within Saxmundham.
- 2.4.7.11 The majority of assets dating the medieval period are land divisions, earthworks, and chance finds of pottery scatters, which may represent waste material being spread on the agricultural field which surround the settlements. It is, however, also possible that some of the more focused scatters might represent settlement activity associated with abandoned or shrunken settlements.
- 2.4.7.12 Most activity dating to the post-medieval within the study area is associated with the agricultural land through which the study area is focused, with land use in the area dominated by arable agriculture. More intensive arable agriculture from the mid-20<sup>th</sup> century onwards has resulted in areas of woodland and field boundaries being removed to create large fields (for example the site of the proposed Saxmundham Converter Station), although the field system that survives can be traced on 19<sup>th</sup> century mapping. The remaining non-designated assets dating to the post-medieval period include the Aldeburgh to Saxmundham railway line (MSF35003), lime kilns (MSF14889), industrial buildings/brick kilns (MSF14964 and MSF21704), and quarrying (including MXS18779 and MXS18783).
- 2.4.7.13 The modern period is very well represented with a large number of non-designated assets dating to the Second World War recorded near the coast as well as inland. These remains include pillboxes (including MSF26002, MSF26003, and MSF26339), anti-tank ditches (MSF34510), obstacles (including MXS18768 and MXS19739), and associated buildings/features (including MSF33604 and MXS19861). These were constructed to create a network of defence against a possible invasion.

## Future Baseline

- 2.4.7.14 This section considers those changes to the baseline conditions described above that might occur during the time period over which the Proposed Project will be in place, or changes that might occur in the absence of the Proposed Project being constructed.
- 2.4.7.15 Changes to buried archaeological assets, as well as built heritage, which might occur during the lifespan of the Proposed Development or in the absence of the Proposed Project are minimal. They would be limited to typical taphonomic (i.e., erosion, degradation, corrosion, etc.) processes on buried archaeological assemblages as well as buildings and structures. This would be unlikely to significantly alter the current baseline conditions.

## 2.4.8 Mitigation

- 2.4.8.1 As set out in **Volume 1, Part 1, Chapter 5: PEIR Approach and Methodology**, mitigation measures typically fall into one of the three categories: embedded measures; control and management measures; and mitigation measures.

## Embedded Measures

- 2.4.8.2 Embedded measures have been integral in reducing the cultural heritage effects of the Proposed Project. Measures that have been incorporated into the design are:
- Sensitive routing and siting of infrastructure and temporary works;
  - Commitments made within **Volume 2, Part 1, Appendix 1.4.F: Outline Schedule of Environmental Commitments and Mitigation Measures**.

## Control and Management Measures

- 2.4.8.3 The following measures have been included within **Volume 2, Part 1, Appendix 1.4.A: Outline Code of Construction Practice** relevant to the control and management of impacts that could affect cultural heritage receptors:
- H01 – Locations of known archaeological interest/value, or areas where archaeological work is planned, will be signposted/fenced off to avoid unintentional damage.
  - H02 – Where a previously unknown heritage asset is discovered, or a known heritage asset proves to be more significant than foreseen at the time of application, the Project Team will inform the relevant local planning authority and will agree a solution that protects the significance of the new discovery, so far as is practicable, within the Proposed Project parameters.
  - H03 – Archaeological excavation, recording, and publication to be undertaken where archaeological features cannot be avoided. Scope of works to be agreed with heritage stakeholders (including the relevant County Archaeologist) prior to works commencing in the relevant area and agreed in the mitigation strategy/site specific Written Scheme of Investigation.
  - H04 – Archaeological Strip, Map, and Record, to be undertaken in pre-agreed areas of archaeological potential/features. Scope of works to be agreed with heritage stakeholders (including the relevant County Archaeologist) prior to works commencing in the relevant area and agreed in the mitigation strategy/site specific Written Scheme of Investigation.
  - H05 – Archaeological Watching Brief to be undertaken in pre-agreed areas of archaeological potential/features. Scope of works to be agreed with heritage stakeholders (including the relevant County Archaeologist) prior to works commencing in the relevant area and agreed in the mitigation strategy/site specific Written Scheme of Investigation.
  - H06 – Deposit modelling/profiling in areas of paleo-environmental potential. Scope of works to be agreed with heritage stakeholders (including the relevant County Archaeologist) prior to works commencing and agreed in the mitigation strategy/site specific Written Scheme of Investigation.

## Mitigation Measures

- 2.4.8.4 Mitigation measures are additional topic and site-specific measures that have been applied to mitigate or offset any likely significant effects. No mitigation measures, additional to the embedded measures and control and management measure described above are proposed based on the preliminary assessment.



## 2.4.9 Preliminary Assessment of Effects

### *Construction Phase*

- 2.4.9.1 The preliminary assessment of the effects of the Suffolk Onshore Scheme described in this section considers the embedded, control and management and mitigation measures described in section 2.4.8.
- 2.4.9.2 Potential impacts identified during the construction phase include direct physical impacts on heritage assets within the Suffolk Onshore Scheme Boundary resulting from construction works, as well as temporary impacts to the setting of assets resulting from elements such as machinery, and light and noise pollution.
- 2.4.9.3 Due to the limited data currently available relating to aspects such as traffic modelling, machinery and lighting, the preliminary assessment is limited to direct physical impacts to heritage assets resulting from construction. Temporary impacts to the setting of assets resulting from construction works will be fully considered as part of the ES.
- 2.4.9.4 It is assumed for the purpose of this preliminary assessment that there will be no additional impacts on buried heritage assets during decommissioning activities. It is assumed that decommissioning will be undertaken within the same footprint used during construction and therefore any impact to buried heritage assets would have occurred, and have been mitigated, at the construction phase. An updated impact assessment will be undertaken for the ES when more detailed design information is available.
- 2.4.9.5 A total of 62 non-designated assets on the Suffolk HER were recorded as falling wholly or partially within the Suffolk Onshore Scheme. These include several features near the landfall which the Proposed Project will not impact due to the commitment to use a trenchless technique at this location as described in **Volume 1, Part 1, Chapter 4: Description of the Proposed Project (MXS19733; MXS19734; MXS19735; MXS19737; MXS19739; MXS19740; MXS19742; MXS19752; MXS19838; MXS19861; MXS19863; MSF12593; MSF34510; MSF21037; MSF35003)**, and as a result these have not been included in the preliminary assessment of cultural heritage effects as no impacts are predicted.
- 2.4.9.6 In addition to these features, a number of areas of woodland that are recorded on the HER will also be avoided through the micro-siting of works which will result in no impacts (**MSF19482**), while a haul road proposed near a former brick works will use an existing track which will remove potential impacts on the brick works site (**MSF22815**). This is also the case with haul/access roads that will use existing tracks/roads near an area of former quarries (**MXS18780**), areas of prehistoric finds (**MSF24054; MSF34410**), and Common Land near Leiston Road (**MSF33604; MSF43261**).
- 2.4.9.7 Finally, a number of farmsteads recorded on the HER also show the limits of buildings extending into the Suffolk Onshore Scheme (**MSF39278; MSF39520; MSF39869; MSF2330; MSF39867; MSF38516; MSF39282; MSF39918/LB1231179**). No buildings will be demolished/removed as part of the construction phase, while impacts on the setting of these assets will be temporary and limited to the construction phase, and as a result these non-designated assets have also been excluded from the assessment. This is also the same for various railway lines that remain in operation and will be crossed using trenchless technologies (**MSF35003; MSF34987**).

- 2.4.9.8 The remaining non-designated assets within the Suffolk Onshore Scheme have been assessed individually or grouped where appropriate (i.e., where multiple assets are assumed to form part of one larger site/complex, or where different assets in a single field/location are of the same type/form/character, and the level of impact is deemed to be the same for all).
- 2.4.9.9 The preliminary cultural heritage assessment of the effects of the Suffolk Onshore Scheme is presented in the following tables.
- 2.4.9.10 Table 2.4.12 to Table 2.4.26 presents the preliminary assessment of direct physical impacts on non-designated heritage assets within the Suffolk Onshore Scheme. No direct impact on designated assets is envisaged for the Proposed Project.

**Table 2.4.12 Preliminary assessment of direct physical impacts on non-designated assets (collection of military remains)**

<b>Preliminary assessment</b>	
Receptor	Collection of military remains ( <b>MXS19743; MXS19744</b> )
Potential Impact	Partial loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Low: The remains are considered to have some archaeological value for the information they could hold regarding the wartime operations/activities in the area. These remains are non-designated and based on current knowledge are assumed to be of local significance.
Preliminary magnitude	Small: It is assumed that physical impacts resulting from the cable corridor and associated haul road will be limited to a small percentage/area of the total area of archaeological remains, based on the footprint of the works required for construction (as currently understood).
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	Low: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.
Preliminary magnitude	Medium: A larger working area would be required with co-location (including a wider construction swathe for the cable routes) which would potentially result in physical impacts on a larger area of remains.

<b>Preliminary assessment</b>	
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Medium Confidence, based on current design information and the understanding of the extents/value of the archaeological remains.

**Table 2.4.13 Preliminary assessment of direct physical impacts on non-designated assets at Gorse Hill**

<b>Preliminary assessment</b>	
Receptor	Burnt area with crop marks and find scatters dating from the prehistoric through to medieval period at Gorse Hill ( <b>MSF2524; MSF2532; MSF2538; MSF2539; MSF2543; MSF2552; MSF33592; MXS19741</b> ).
Potential Impact	Partial loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	High: The remains are considered to have archaeological value for the information they could hold regarding settlement and land use in the area from the prehistoric period onwards. These remains are non-designated, however, consultation with stakeholders has identified that these remains are considered to be of national significance.
Preliminary magnitude	Medium: The Proposed Project has the potential to result in physical impacts on a large area of the remains, based on the extent of remains mapped on the HER dataset, resulting from construction compounds, the open cut trench, and the associated haul road (based on current knowledge of their extent).
Preliminary likely significance of effect	Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Moderate Confidence, based on current design information and the understanding of the extents/value of the archaeological remains.
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	High: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.

<b>Preliminary assessment</b>	
Preliminary magnitude	Large: A larger working area would be required with co-location (including a wider construction swathe for the cable routes) which would potentially result in physical impacts on a larger area of remains.
Preliminary likely significance of effect	Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Moderate Confidence

Table 2.4.14 Preliminary assessment of direct physical impacts on non-designated assets (ditches and field boundaries recorded as cropmarks)

<b>Preliminary assessment</b>	
Receptor	Ditches and field boundaries recorded as cropmarks ( <b>MSF33591</b> )
Potential Impact	Minor loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Low: The remains are considered to have archaeological value in the information they might contain relating to land management and land use. These remains are non-designated and are assumed to be of local significance.
Preliminary magnitude	Small: Only a limited area of the remains, as currently mapped on the HER dataset, will potentially be lost during construction of the open cut trench and associated haul road, with the majority of the feature located outside of the Site.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	Low: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.
Preliminary magnitude	Medium: A larger working area would be required with co-location (including a wider construction swathe for the cable routes and a bigger footprint for the converter stations) which would potentially result in physical impacts on a larger area of remains.

<b>Preliminary assessment</b>	
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Medium Confidence based on current design information and the understanding of the extents/value of the archaeological remains.

**Table 2.4.15 Preliminary assessment of direct physical impacts during construction on non-designated military remains**

<b>Preliminary assessment</b>	
Receptor	Collection of military remains ( <b>MXS18768; MXS18778</b> )
Potential Impact	Partial loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Low: The remains are considered to have some archaeological value for the information they could hold regarding the wartime operations/activities the area. These remains are non-designated and are assumed to be of local significance, although it is currently unclear if any features remain.
Preliminary magnitude	Small: It is assumed that physical impacts will be limited to a small percentage/area of the total area of archaeological remains, as recorded on the HER database, resulting from the open cut trench and the associated haul road.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	Low: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.
Preliminary magnitude	Medium: A larger working area would be required with co-location (including a wider construction swathe for the cable routes and a bigger footprint for the converter stations) which would potentially result in physical impacts on a larger area of remains.

<b>Preliminary assessment</b>	
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Medium Confidence based on current design information and the understanding of the extents/value of the archaeological remains.

**Table 2.4.16 Preliminary assessment of direct physical impacts resulting from construction on non-designated post-medieval quarry pits**

<b>Preliminary assessment</b>	
Receptor	Six post-medieval quarry pits ( <b>MXS18781</b> )
Potential Impact	Minor loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Negligible: The former quarry pits represent post-medieval extraction activities. They are likely to have very limited archaeological interest and are thought to be poorly preserved.
Preliminary magnitude	Small: Only a limited area of the pits, as recorded in the HER data, is expected to be impacted by the construction works resulting in the partial loss of the assets archaeological interest.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	Negligible: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.
Preliminary magnitude	Medium: A larger working area would be required with co-location (including a wider construction swathe for the cable routes and a bigger footprint for the converter stations) which would potentially result in physical impacts on a larger area of remains.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence

Table 2.4.17 Preliminary assessment of direct physical impacts on non-designated assets (former Hazlewood Aerodrome)

<b>Preliminary assessment</b>	
Receptor	Former site of Hazlewood Aerodrome ( <b>MXS18782</b> )
Potential Impact	Partial loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Low: The site of the former aerodrome has some limited archaeological significance as it may contain information linked to the aerial warfare during World War One. However, as a landing ground, the airfield would have lacked significant buildings or infrastructure and very little of what few buildings may have existed survive. As a result, this non-designated asset is considered to be of local significance.
Preliminary magnitude	Small: Only a limited area of the site of the former aerodrome will be impacted by the open cut trench and associated haul road, and the area that will be impacted is not thought to contain any remains of airfield features.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Medium Confidence, based on current design information and the understanding of the extents/value of the archaeological remains.
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	Low: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.
Preliminary magnitude	Small: While a larger working area would be required, the percentage of the asset which would be impacted would still be limited. Furthermore, based on current knowledge, the area of the aerodrome that would possibly be impacted by the wider open cut trench is not thought to contain any remains of airfield features. This will be confirmed during the walkover survey to be undertaken as part of the ES process.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted

<b>Preliminary assessment</b>	
Confidence in prediction	Medium Confidence, based on current design information and the understanding of the extents/value of the archaeological remains.

Table 2.4.18 Preliminary assessment of direct physical impacts resulting from the construction phase on non-designated post-medieval quarry pits.

<b>Preliminary assessment</b>	
Receptor	Three post-medieval quarry pits ( <b>MXS18783</b> )
Potential Impact	Minor loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Negligible: The former quarry pits represent post-medieval extraction activities. They are likely to have very limited archaeological interest and are thought to be poorly preserved.
Preliminary magnitude	Small: Only a limited area/section of the pits, based on the current understanding of the extent of the features as mapped on the HER, is expected to be impacted by the construction works for the open cut trench and associated haul road resulting in a minor loss of remains.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	Negligible: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.
Preliminary magnitude	Small: Due to the distribution of the pits, only a small proportion would be impacted by a larger working area with co-location (including a wider construction swathe for the cable routes and a bigger footprint for the converter stations).
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence



Table 2.4,19 Preliminary assessment of direct physical impacts resulting from the construction phase on an area of Friston Moor.

<b>Preliminary assessment</b>	
Receptor	Area of Friston Moor (a former common) ( <b>MSF17578</b> )
Potential Impact	Minor loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Low: The area of the HER listing covers a section of Friston Moor recorded from historic mapping. While the area has some historic interest, it is thought to have been used for agriculture (potentially common grazing land) and as such may contain some limited post-medieval agricultural remains. It is a non-designated asset that is considered to be of local significance.
Preliminary magnitude	Negligible: Only a limited area is expected to be impacted by the construction works associated with the open cut trench and associated haul road resulting in a minor loss of any remains that might exist.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	Low: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.
Preliminary magnitude	Negligible: While a larger working area would be required with co-location (including a wider construction swathe for the cable routes and a bigger footprint for the converter stations), potentially resulting in a larger physical impact, the asset is not thought to contain any additional remains/archaeological features. Furthermore, the works would still only result in a physical impact on a limited area of the overall asset.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Medium Confidence, based on current design information and the understanding of the extents/value of the archaeological remains.

Table 2.4.20 Preliminary assessment of direct physical impacts during construction on a non-designated rectilinear enclosure.

<b>Preliminary assessment</b>	
Receptor	Rectilinear enclosure recorded through aerial photography ( <b>MSF16193</b> )
Potential Impact	Loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01
Preliminary sensitivity	Low: The purpose or date of the feature is not known, although it is assumed to survive as a sub-surface feature and therefore may have a level of archaeological interest. The remains are non-designated and are assumed to be of local significance due to their form/shape being of a type generally dated to the Iron Age/Roman period, and relatively common.
Preliminary magnitude	No Change: It is assumed that while the asset is within the draft Order Limits, it will be possible to avoid due the size of the Order Limits in this area.
Preliminary likely significance of effect	Not Significant (no change in predicted as it is assumed the asset will be avoided).
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	Low: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.
Preliminary magnitude	Medium: A larger working with co-location (including a wider construction swathe for the cable routes and a bigger footprint for the converter stations) may require the partial loss of the asset.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Medium Confidence

Table 2.4.21 Preliminary assessment of direct physical impacts resulting from construction on a non-designated decoy pond.

<b>Preliminary assessment</b>	
Receptor	Decoy pond ( <b>MSF2331</b> )

<b>Preliminary assessment</b>	
Potential Impact	Partial loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01
Preliminary sensitivity	Low: The asset's heritage significance derives from its archaeological and historic interests and information it could provide about land use in the post-medieval period.
Preliminary magnitude	No Change: It is assumed that the asset will be avoided by the design, if feasible, as set out in Section 2.4.8.
Preliminary likely significance of effect	Not Significant (no change in predicted as it is assumed the asset will be avoided).
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	Low: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.
Preliminary magnitude	Medium: A larger working area with co-location (including a wider construction swathe for the cable routes and a bigger footprint for the converter stations) may require the partial loss of the asset.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Medium Confidence, based on current design information and the understanding of the extents/value of the archaeological remains.

Table 2.4.22 Preliminary assessment of direct physical impacts resulting from construction on the non-designated site of Great Wood.

<b>Preliminary assessment</b>	
Receptor	Site of cleared woodland known as Great Wood ( <b>MSF19469</b> )
Potential Impact	Loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05

<b>Preliminary assessment</b>	
Preliminary sensitivity	Negligible: The site of a former woodland has been identified through historic mapping. This was cleared in the 20 <sup>th</sup> century. While the former area of woodland has some limited historic interest associated with landscape management and development. The historic interest is limited to cartographic evidence. No archaeological remains are expected, and no structures are thought to have existed in the woodland.
Preliminary magnitude	High: The Proposed Project would result in the development of the footprint of the former woodland due to the construction of the converter station, as well as associated screening.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	Negligible: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.
Preliminary magnitude	High: The Proposed Project would result in the development of the footprint of the former woodland.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence

Table 2.4.23 Preliminary assessment of direct physical impacts resulting from the construction phase on a non-designated cropmark.

<b>Preliminary assessment</b>	
Receptor	Double cropmark possibly representing a former road ( <b>MSF2093</b> )
Potential Impact	Potential loss of minor section of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Low: A possible former road has been recorded through aerial photography. Any remains that survive as sub-surface features will have some archaeological significance linked to the information, they hold about

<b>Preliminary assessment</b>	
	the former road network/infrastructure of the area. This non-designated asset is considered to be of local interest.
Preliminary magnitude	Small: Due to the length of the cropmark feature, only a small section of remains, as currently mapped on the HER, will be impacted by construction works.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	Low: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.
Preliminary magnitude	Small: Co-location would not result in a larger area of working in this area.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence

Table 2.4.24 Preliminary assessment of direct physical impacts on non-designated assets (site of cleared field barn)

<b>Preliminary assessment</b>	
Receptor	Former site of now cleared field barn ( <b>MSF39915</b> )
Potential Impact	Loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Negligible: Any archaeological remains surviving on the site of a former field barn may have some limited archaeological interest linked to the information they may contain associated with post-medieval agriculture, although it is currently unclear if any remains survive. As the feature represents the former site of a type of agricultural building common in East Suffolk, as well as East Anglia in general, and as it has been demolished, its value is considered to be negligible.
Preliminary magnitude	Medium: The Proposed Project has the potential to result in a physical impact on part of the site of the former barn resulting from construction of a haul road.

<b>Preliminary assessment</b>	
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	Negligible: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.
Preliminary magnitude	Medium: Co-location would not result in a larger area of working in this area.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Medium Confidence

Table 2.4.25 Preliminary assessment of direct physical impacts resulting from construction on the non-designated assets park and garden linked to Friston Hall.

<b>Preliminary assessment</b>	
Receptor	Park and garden linked to Friston Hall ( <b>MSF23092</b> )
Potential Impact	Partial loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Low: The HER site that covers the former landscape surrounding Friston Hall includes a large area of land, much of which has lost any traces of a designed landscape that may have existed due to the opening up of fields into larger arable fields. The northern section of the landscape, through which the draft Order Limits pass, were used as agricultural land from at least the 19 <sup>th</sup> century, while the more formal landscape was focused to the south around the main avenue that linked to Aldeburgh Road. As a non-designated landscape, it is considered to be of local importance.
Preliminary magnitude	Negligible: Works within this area are not expected to be intrusive and will be limited to above ground works on existing towers.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted

<b>Preliminary assessment</b>	
Confidence in prediction	High Confidence
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	Low: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.
Preliminary magnitude	Negligible: Co-location would not result in a larger area of working/more intrusive works in this area.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence

Table 2.4.26 Preliminary assessment of direct physical impacts resulting from construction on the non-designated asset known as Friston Green.

<b>Preliminary assessment</b>	
Receptor	Area recorded as 'Friston Green' on historic mapping ( <b>MSF43589</b> )
Potential Impact	Partial loss of archaeological remains during construction
Proposed Project phase	Construction
Duration	Permanent
Mitigation	H01, H03, H04, H05
Preliminary sensitivity	Low: The area of the HER listing covers a section of Friston Green recorded from historic mapping. While the area has some historic interest, it is assumed to have been used for common grazing land/livestock corralling, and as such may contain some limited post-medieval agricultural remains. No structures are thought to have existed on the green in the area that falls within the draft Order Limits, with any structural remains/buildings more likely to have been further to the north near the settlement. It is a non-designated asset that is considered to be of local importance.
Preliminary magnitude	Negligible: Only a limited area is expected to be impacted by the construction works, as the draft Order Limits in this area are for limited junction widening/improvements only.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence

<b>Preliminary assessment</b>	
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	Low: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.
Preliminary magnitude	Negligible: Co-location would not result in a larger area of working/more intrusive works in this area.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	High Confidence

2.4.9.11 There is the potential for previously unrecorded archaeological remains to survive throughout the area encompassed by the draft Order Limits. Based on current knowledge (i.e., the known archaeology of the area) these are considered to be largely of local and regional sensitivity (low or medium value). A full assessment of unrecorded archaeological remains will be undertaken for the ES.

#### ***Operation and Maintenance Phase***

2.4.9.12 The preliminary assessment of the effects of the Suffolk Onshore Scheme on the setting of heritage assets during operation has also been considered, and this is presented in the following tables.

2.4.9.13 Designated assets within 2 km of the proposed above ground infrastructure were reviewed in combination with ZVT data produced for the Proposed Project (see **Figure 2-4-2 Designated assets within the 2 km study area with the Zone of Theoretical Visibility (ZTV) for the Proposed Project**, **Figure 2-4-3 Designated assets within the 2 km study area with the ZTV for SeaLink and Friston** and **Figure 2-4-4 Designated assets within the 2 km study area along with the ZTV for Co-location**). This review examined how the setting of an asset contributed to its heritage value and included if there were any key views of or towards the asset that contributed to its value.

2.4.9.14 A number of assets were scoped out of the preliminary assessment as their setting was not found to contribute to their significance, they were found to fall outside of the ZTV, or initial site visits found that they were well screened by other buildings, seasonal and year round vegetation cover, or the general topography. This includes the following assets:

- Grade II\* listed Church of St John the Baptist, Saxmundham (LB1268184);
- Grade II\* listed Church of Mary Magdalane (LB1278252);
- 
- Grade II\* Friston Post Mill, Friston (LB1215741);
- Grade II listed Sternfield House Vicarage (LB1231300);
- Grade II listed Little Moor Farm (LB1215743);
- Grade II listed High House Farm (LB1216049);



- Grade II listed Hill Farmhouse (LB1231296).

2.4.9.15 Table 2.4.27 to Table 2.4.30 presents the preliminary assessment of potential impacts on the setting of known heritage assets.

**Table 2.4.27 Preliminary assessment of impacts on the setting of Wood Farmhouse**

<b>Preliminary assessment</b>	
Receptor	Wood Farm Grade II Listed Building ( <b>LB1231179</b> )
Potential Impact	Impacts on the setting of the farmstead
Proposed Project phase	Operational
Duration	Long term
Mitigation	See embedded measures described in section 2.4.8
Preliminary sensitivity	Medium: The Grade II listed farmstead is located to the east of Saxmundham and is located on a private access to the south of the B1119 road. The farmhouse is flanked by banks of mature trees to the west and south, while very large 20 <sup>th</sup> century agricultural buildings (including barns) border the farmhouse to the north. Beyond these features, the wider landscape is dominated by arable agricultural land, with large fields dominating the landscape due to the removal of hedgerows in the second half of the 20 <sup>th</sup> century. The farmhouse was damaged by fire in early 2023. As a Grade II listed building, the asset is considered to be of medium value.
Preliminary magnitude	Small: The farmstead will be partially screened from the proposed converter station by large later 20 <sup>th</sup> century agricultural buildings, if located in the northern section of the area of the land suggested for the converter station, which are located to the northeast of the listed building. Trees surrounding the farmhouse will also provide some screening throughout the year due to the mature nature of the hedges and trees if the converter station was to be located in the southern section of the fields. Furthermore, the farmstead was not designed to have long ranging views over the surrounding landscape, or to be a prominent feature in the landscape. As a farmstead, the asset represents a domestic building that was designed to be a functional centre (as a residence) for the operational running of the agriculture, and this function will still be understood.  It is, however, acknowledged that the agricultural fields that surround the farm represent a component of the farms setting, and the loss of some of these fields will erode the agricultural setting of Wood Farm.
Preliminary likely significance of effect	Not Significant

<b>Preliminary assessment</b>	
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Medium Confidence based on current design information and the understanding of setting of the asset.
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	Medium: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.
Preliminary magnitude	Medium: Co-location has the potential for more above ground infrastructure, such as the converter stations, to be visible from the farmhouse, although the asset will still not be completely severed from the agricultural land which is a key component of its setting.
Preliminary likely significance of effect	<b>Significant</b>
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Medium Confidence based on current design information and the understanding of the setting of the asset.

Table 2.4.28 Preliminary assessment of impacts on the setting of Hurts Hall and parkland resulting from the operational phase of the scheme

<b>Preliminary assessment</b>	
Receptor	Hurts Hall II Listed Building ( <b>LB1268178</b> )
Potential Impact	Impacts on the setting of the hall and landscape
Proposed Project phase	Operational
Duration	Long term
Mitigation	See embedded measures described in section 2.4.8
Preliminary sensitivity	Hurts Hall is Medium sensitivity, surrounding landscape is Low sensitivity: The hall is located on the south side of Saxmundham and was built in 1893 to replace the original 1803 hall which was destroyed by fire in 1889. It was further extended in the early 20 <sup>th</sup> century and is positioned in an area of mature woodland which blocks most views to the north and east with the main views out from the hall being to the south and west. Late 19 <sup>th</sup> century mapping of the surrounding parkland shows woodland throughout the area, much of which has been lost as land has been put over to agriculture. Furthermore, a treelined avenue which previously appears to have linked the hall to the adjacent Wood Farm (also Grade II listed) to the east has also been partially removed and no longer serves as a trackway.

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## Preliminary assessment

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The main access to the hall remains from the northwest, although this is no longer on its original alignment, and an earlier second access track from the southwest has been removed with the land it passes through also put over to arable use.

Views from the hall are limited due to the woodland screening, and as a result there will be limited views of a converter station located anywhere within the fields proposed for the converter station. There are some views of the hall from Saxmundham Road to the west. However, it is likely that views of the hall from the west were not part of the original design, and early map surveys show woodland to the west and south (since removed) suggesting the hall was originally designed to be screened on all sides.

As a Grade II listed building, the asset is considered to be of medium value, deriving from its architectural and historic interests. The parkland in which it is located is not designated, and it is not listed as parkland considered to be of 'area wide significance' in the Suffolk Coastal Local Plan (Ref 2.4.9) but contributes to the appreciation of the hall and forms part of its setting. Much of the parkland's original design and character has been lost due to the land being changed to arable, while many of the trees on the south/southwestern side have been removed to open up views to the south/southwest that were not originally designed as part of the house and parkland. It is considered to be of local importance, and therefore low value.

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Preliminary magnitude	Small: Views of a converter station anywhere within the LoD from the hall may be limited due to existing screening from mature woodland, as well as the direction the hall faces. While the converter station may be partially visible in the background when the hall is viewed from the B1121 to the west, if located in the area adjacent to Woodhall Farm, there is no evidence to suggest there were ever key designed views of the hall from the west/the B1121 with the setting very much within the inner grounds which were surrounded by woodland. Furthermore, its value is largely linked to its architectural interest, and not as a result of views to or from the asset. There is also the potential for views of the proposed access tracks/permanent access to the south of the hall, although the hall was not designed to have views to the south and only has views now as trees on this side have been removed.
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Preliminary likely significance of effect	Not Significant
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Sensitivity Test	No change in significance of effect predicted
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<b>Preliminary assessment</b>	
Confidence in prediction	Medium Confidence based on current design information and the understanding of the setting of the asset.
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	Low and Medium: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.
Preliminary magnitude	Small: Co-location would result in more above ground infrastructure to be visible, although this will be limited to the view from the Saxmundham Road to the west, and it is not clear if this was ever designed to be a key view of the hall.
Preliminary likely significance of effect	Not Significant.
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Medium Confidence based on current design information and the understanding of the setting of the asset.

**Table 2.4.29 Preliminary assessment of impacts on the setting of Buxlow Manor resulting from the operational phase of the scheme**

<b>Preliminary assessment</b>	
Receptor	Buxlow Manor Grade II* Listed Building ( <b>LB1215749</b> )
Potential Impact	Impacts on the setting of the house
Proposed Project phase	Operational
Duration	Long term
Mitigation	See embedded measures described in section 2.4.8
Preliminary sensitivity	High: The 17 <sup>th</sup> century house is located approximately 1 km northeast of the draft Order Limits. It is well screened by woodland, which limit views towards the house and are also assumed to limit views out. While an extensive review of historic mapping has not yet taken place, it can be seen from 19 <sup>th</sup> century mapping that the house originally occupied a prominent position at the north end of Knoddishall Green, with the former church positioned on the eastern side of the green. The 19 <sup>th</sup> century mapping also depicts a further complex of buildings originally sat to the northwest of the house, including Redhouse Farm, but these have now been largely removed and replaced with what appear to be large agricultural buildings. As a result, the setting of the manor house appears to have been the settlement of

<b>Preliminary assessment</b>	
	Knoddishall/Knoddishall Green and is does not appear to have been designed to be a prominent feature in the wider landscape. As a Grade II* listed building, the asset is considered to be of high value.
Preliminary magnitude	Negligible: The house would appear to be relatively well screened from a proposed converter station located within any section of the LoD, but particularly if located in the southern section of the fields, with the existing mature woodland that surrounds the complex blocking most outward views. Furthermore, intervening pockets of woodland, including Friston Covert (near Meadow Mink Farm), as well as high hedgerows will provide additional screening. Finally, the house does not appear to have been designed to be a prominent feature in the wider landscape and was rather built to occupy a key location on the north side of the green of the settlement of Knoddishall Green.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Medium Confidence based on current design information and the understanding of the setting of the asset.
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	High: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.
Preliminary magnitude	Negligible: Whilst Co-location would result in more above ground infrastructure, views should still be limited due to the woodland and vegetation cover. Furthermore, the converter stations would not impact on the setting of the asset which is defined by its associative relationship with Knoddishall Green.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Medium Confidence based on current design information and the understanding of the setting of the asset.

Table 2.4.30 Preliminary assessment of impacts on the setting of the Church of St Mary, Friston, resulting from the operational phase of the scheme

<b>Preliminary assessment</b>	
Receptor	Church of St Mary, Friston, Grade II* Listed Building (LB1287864)
Potential Impact	Impacts on the setting of the church
Proposed Project phase	Operational
Duration	Long term
Mitigation	See embedded measures described in section 2.4.8
Preliminary sensitivity	High: The church is located on the north-eastern side of Friston and is surrounded by a cemetery. A number of large farm buildings are located to the east of the church, while woodland and agricultural land are located to the north. Smaller agricultural fields are also located to the south, but this land, which is surrounded by the streets that form the northern section of Friston, may have originally represented a village green. The positioning of the church within the settlement it served is key to its understanding, and while it has a tower it is not especially prominent from most locations in the wider landscape due to woodland and high hedgerows. As a Grade II* listed building, the asset is considered to be of high value.
Preliminary magnitude	Negligible: Views of the proposed converter station from the church would be limited due to extensive tree cover and woodland. This has been confirmed through the ZTVs that have been produced for the various options ( <b>Figure 2-4-2 Designated assets within the 2 km study area with the Zone of Theoretical Visibility (ZTV) for the Proposed Project, Figure 2-4-3 Designated assets within the 2 km study area with the ZTV for SeaLink and Friston and Figure 2-4-4 Designated assets within the 2 km study area along with the ZTV for Co-location</b> ). Furthermore, the introduction of the proposed converter station would not alter the dominance of the church in the landscape or alter the relationship the church has with the settlement it served. Finally, extensive inward views of the church from outside of the settlement are also limited as a result of tree cover and hedgerows.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Medium Confidence based on current design information and the understanding of the setting of the asset.

<b>Preliminary assessment</b>	
<b>Proposed Project with co-location</b>	
Preliminary sensitivity	High: The preliminary sensitivity of assets expected to remain as assessed for the Proposed Project.
Preliminary magnitude	Negligible: While co-location has the potential for more above ground infrastructure, impacts on the setting of the church would be negligible due to the tree cover/hedgerows that limit views out of the church, as well as views towards the church from the wider landscape.
Preliminary likely significance of effect	Not Significant
Sensitivity Test	No change in significance of effect predicted
Confidence in prediction	Medium Confidence

## 2.4.10 Summary

- 2.4.10.1 The preliminary assessment of impacts resulting from the Suffolk Onshore Scheme assessed the potential for direct physical impacts and indirect impacts on the setting of both designed and non-designated assets resulting from the construction and operational phases of the scheme. The assessment also examined the potential for impacts resulting from co-location of infrastructure with NGV's proposed Nautilus and LionLink interconnector projects.
- 2.4.10.2 In most cases it is predicted that careful design should result in direct impacts on most heritage assets being avoided, or only limited areas of large archaeological sites being impacted, with standard mitigation such as archaeological excavation and recording mitigating impacts. The preliminary assessment suggests there is the potential for a significant physical impact on the Gorse Hill multi-period site (**MSF2524; MSF2532; MSF2538; MSF2539; MSF2543; MSF2552; MSF33592; MXS19741**). This is the same for the co-location option.
- 2.4.10.3 In most cases, the potential for a significant impact on the setting of designed assets resulting from the proposed Saxmundham Converter Station, as well as other permanent works such as permanent access and the Friston Sub-station, is limited due existing woodland and high hedgerows that provide extensive screening, as well as topography and the existing built environment. This is the same for the co-location option with the exception of Wood Farm Listed Buildings (LB1231179) where co-locations could result in a significant effect.

## 2.4.11 References

Ref 2.4.1 Ancient Monuments and Archaeological Areas Act (1979) (as amended). 1979 c. 46. <http://www.legislation.gov.uk/ukpga/1979/46>

Ref 2.4.2 Planning (Listed Buildings and Conservation Areas) Act 1990. 1990 c. 9. <http://www.legislation.gov.uk/ukpga/1990/9/contents>

- Ref 2.4.3 Department of Energy & Climate Change (2011) *Overarching National Policy Statement for Energy (EN-1)*, London, TSO.
- Ref 2.4.4 Department of Energy & Climate Change (2011) *National Policy Statement for Electricity Networks Infrastructure (EN-5)*, London, TSO.
- Ref 2.4.5 Department of Energy & Climate Change (2021) *Draft Overarching National Policy Statement for Energy (EN-1)*, London, TSO.
- Ref 2.4.6 Department of Energy & Climate Change (2021) *Draft National Statement for Electricity Networks Infrastructure (EN-5)*, London, TSO
- Ref 3.4.7 Ministry of Housing, Communities and Local Government (2021) *Revised National Planning Policy Framework (NPPF)*, London: Ministry of Housing, Communities and Local Government.
- Ref 2.4.8 Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework (NPPF) Planning Practice Guidance (PPG). Conserving and enhancing the historic environment, London: Ministry of Housing, Communities and Local Government.
- Ref 2.4.9 East Suffolk Council (2020) *Suffolk Coastal Local Plan*.
- Ref 2.4.10 Waveney District Council (2019) *Waveney Local Plan*.
- Ref 2.4.11 East Suffolk Council (2021) *Historic Environment: Supplementary Planning Document*.
- Ref 2.4.12 AECOM (2022) *Scoping Report, unpublished report for National Grid*.
- Ref 2.4.13 AECOM (2022) Scoping response, *unpublished report for National Grid*.
- Ref 2.4.14 Historic England (2015) *Good Practice Advice 2: Managing Significance in Decision-taking*, Swindon: Historic England.
- Ref 2.4.15 Historic England (2017) *Good Practice Advice 3: The Setting of Heritage Assets (Second Edition)*, Swindon: Historic England.
- Ref 2.4.16 Historic England () *Historic England Advice Note 2: Making Changes to Heritage Assets*, Swindon: Historic England.
- Ref 2.4.17 Historic England () *Historic England Advice Note 12: Statements of Heritage Significance*, Swindon: Historic England.
- Ref 2.4.18 Chartered Institute for Archaeologists (2020) *Standard and Guidance for Historic Environment Desk-Based Assessment*, Reading: Chartered Institute for Archaeologists.
- Ref 2.4.19 Department for Levelling Up, Housing, and Communities (2012) National Planning Policy Framework [online] Available at National Planning Policy Framework - Annex 2: Glossary - Guidance - GOV.UK ([www.gov.uk](http://www.gov.uk)) [accessed 28<sup>th</sup> June 2023].
- Ref 2.4.20 Scottish Power and Renewables (2019a) *East Anglia Two Offshore Windfarm, Chapter 24: Archaeology and Cultural Heritage*
- Ref 2.4.21 Scottish Power and Renewables (2019b) *East Anglia Two Offshore Windfarm, Appendix 24.4: Geophysical Survey Report*.
- Ref 2.4.22 Scottish Power and Renewables (2020) *East Anglia Two Offshore Windfarm: Pre-Construction Trial Trenching Report*.



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