



SPR EA1N and EA2 PROJECTS

DEADLINE 2 - COMMENTS ON ESC AND SCC JOINT LOCAL IMPACT REPORT

Interested Party: SASES

PINS Refs: 20024106 & 20024110

Issue: 1

Reference/Paragraph No.	Statement	SASES comment
Adequacy of the application – 6.14	It is understood that the Applicants intend to provide a community benefits fund. This will provide a sum of money in recognition of the impacts experienced by the local community because of the projects. This fund is however separate from the DCO process and does not form a relevant consideration for the purposes of determining the DCO applications, although the Councils welcome this commitment.	A community benefits fund can in no way compensate the Friston community for the blight, disruption and permanent impacts of these projects. In the absence of any quantification of such a fund, its application to Friston or a binding commitment, this intention is meaningless.

<p>Future Energy projects 6.48 – 6.54</p>		<p>SASES notes the local authorities comments on future energy projects and makes many of the same points in its Written Representation on Cumulative Impact. Aside from the potential expansion of the National Grid infrastructure at Friston there are also the implications of a multiplicity of cable routes to serve all these projects plus the substantial amount of land required for additional substations and convertor stations – see SASES’ Written Representations on Land Use.</p>
<p>External Lighting 8.1 – 8.6</p>		<p>We note the Councils’ comments but there will be very substantial operational lighting at the site and therefore we would question whether a plan can be sufficiently robust to avoid light pollution. See Written Representation on Light Pollution.</p> <p>If the projects are consented an operational artificial lighting scheme should be agreed <u>as part of the design process</u> so that the design reflects the need to minimise light pollution. [</p>
<p>Built Heritage 12.22</p>	<p>Given that it is not considered possible to directly mitigate the harm caused to the significance of these assets, the Councils have requested that the Applicants provide appropriate compensation to offset this heritage harm. The Councils have discussed with the Applicants the provision of a fund for heritage assets which would provide the opportunity for funding to be made available to pay for works to be undertaken to the affected heritage assets, particularly the church. The intention is that these works would contribute to the long-term conservation of</p>	<p>The suggestion of a fund/compensation to offset heritage harm is misconceived. If you separate a heritage asset from its setting of approaching 1000 years you diminish it beyond mitigation/compensation.</p> <p>The concept of such a fund from the Applicant is likely to be objectionable to Friston churchgoers and the community as a whole.</p>

	these important designated heritage assets.	
Design and Masterplan 14.3 14.13 – 14.14	<p>The Councils want to ensure that all reasonable endeavours have been made to minimise the size and scale of the substations, through the parameters of the buildings themselves and through their siting, including whether they could be lowered into the ground.</p> <p>It is for the above reasons that the Councils support the use of a National Grid GIS at Friston in preference for the use of a National Grid GIS</p>	<p>Lowering into ground is unlikely to be feasible given surface water flooding issues at the site.</p> <p>The Councils indicate a preference for GIS technology. However whilst they list its advantages they have not mentioned its disadvantage namely it is substantially higher – 16 m for a GIS versus 6m for an AIS. Nor do they mention that GIS technology would allow the site to be more readily expanded to accommodate the other projects which will all likely connect at Friston.</p> <p>Whilst every effort should be made to reduce the size and scale of the infrastructure, which includes not just substations but cable sealing ends and other structures the Councils are not in a position to judge whether such effort has been made. Therefore there needs to be independent expert advice on this matter - see SASES Written Representation on Substation Design and comments on ExQ1 responses.</p>
Landscape 15.28	Following discussions with the Applicants, subsequent information and graphics been	There is a reference to “subsequent information and graphics have been supplied which offer greater clarity” in the context of mitigation planting growth rates. To extent it has not already been provided that information should be published.

15.34	supplied which offered greater clarity on this.	<p>SASES endorses the Councils' concerns about the long-term management of the site. It also needs to be clarified who will have responsibility for this management since the rights under the DCOs in respect of the National Grid connection hub will be transferred to National Grid and EA1N and EA2 may end up in the ownership of different undertakers. There should be joint and several obligations across all undertakers in respect of ongoing maintenance and management.</p>
<p>Land Use</p> <p>17.9</p>	<p>The use of a GIS National Grid substation would also help to reduce the land take associated within the substation infrastructure.</p>	<p>Whilst in theory this might be true it is highly likely that the land released will not be capable of productive use since it would be within the area of mitigation planting.</p>
<p>Noise</p> <p>19. 35</p>	<p>Amendment to the wording of Requirements 26 and 27 to set the noise limit at or below background levels and to include an additional monitoring receptor to the north of the site.</p>	<p>There should not be a restriction to identified locations. The basic requirement should be applicable at any location no greater than the shortest distance to any sensitive location. Whilst it is appropriate that monitoring takes place at specific locations there should be the right to request additional or alternative monitoring locations at any distance from the site. In addition monitoring should not be time limited to the commencement of operational use and six months after operational use. Transformers in particular can become noisier as they age and therefore there should be an ongoing program of noise monitoring.</p> <p>Monitoring should always take place when the substations are operating at full capacity, i.e. maximum load, and this needs to be independently certified.</p>

<p>Socio-economic</p>		<p>The holiday accommodation in this area is “holiday accommodation”. There is no consideration of the effects of holiday accommodation being shared by visitors and their families and construction workers or how this impacts on communities.</p> <p>There is no information as to the real benefits being delivered by the existing projects EA1N or EA3. With reference to the £30 million being invested in Lowestoft port this should be spread over at least four and if not more projects. Our understanding is that the overall investment in EA1 alone was £2.5 billion. In that context a fractional share of £30 million is insignificant.</p> <p>In terms of skills and education this is all very vague. There are no targets or deliverables. The question needs to be asked as to what meaningful results with long term benefits have been achieved in skills and education from the EA1 and EA3 projects.</p> <p>Paragraph 5.12.7 of EN-1 states that “the IPC may conclude that limited weight is to be given to assertions of social economic impacts that are not supported by evidence”</p>
<p>Traffic and Transport</p> <p>21.46</p>		<p>Whilst temporary traffic signals may address safety issues there appears to be no analysis of the congestion impact of such signals given that they will regularly halt the traffic on the A12. Such congestion impacts would not only be felt at this junction but on local “rat run” routes and cause further congestion at the Snape crossroads on the A1094.</p> <p>Furthermore there is no analysis of how the construction works required for a new roundabout (see EDF proposals referred to in paragraph 21.47) at A12/A1094 junction will impact traffic flows and when. Clearly the construction of such a roundabout will cause congestion which would only be exacerbated by the traffic required to support the Applicant’s and National Grid’s projects.</p> <p>A very substantial new potato processing plant and a weighbridge and office development was consented by the Local Planning Authority on 23 April 2019. It is being built on the northern side of the A1094 near to the A12/A1094 junction. This</p>

		<p>will create further HGV and other traffic. The implications for cumulative traffic and transport needs and forecasts must be thoroughly assessed, in particular with regards to safety and congestion.</p> <p>http://publicaccessdocuments.eastsuffolk.gov.uk/NorthgatePublicDocs/01440365.pdf</p> <p>On the southern side of the same junction there is a thriving farm shop and café which is currently building a substantial extension for a deli and staff area. There has been a steady increase in custom and cars at the Farm Shop and Café and they continue to expand. Further there are other businesses on the site which is increasingly becoming a retail destination very close to the A12/ A1094 junction. There is no formal junction at this site, traffic merely turns left and right off the highway. The future growth of this site and resulting traffic needs to be addressed.</p> <p><u>Operational Access Road</u></p> <p>It is a concern that the LIR does not address the future use of the up to 8m wide 1.7km long access road from the B1121 which has been identified as unsuitable for construction traffic. The future use of this road needs to be controlled so that by default it does not become a construction access road for future developments (e.g. by National Grid) at the substation site.</p>
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