

SPR EA1N and EA2 PROJECTS



DEADLINE 2 - COMMENTS ON STATEMENT OF COMMON GROUND WITH ESC/SCC

Interested Party: SASES

IP Reference Nos. 20024106 & 20024110

Issue: 2

The following are SASES's comments on the Statement of Common Ground with East Suffolk Council and Suffolk County Council. The absence of any comment on any individual statement should not be taken as an indication that SASES either agrees or disagrees with such statement.

| Reference | Statement | SASES comment |
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| ECOLOGY | | |
| LA-02.12, LA-02.13 & LA-02.14 Whether the ES adequately assesses the impacts on bats during construction | | SASES supports the Councils' opinion that the growth rates of mitigation planting, which underpin the assessment of impacts on bats, hedgerows and woodlands, are incorrect. See report from Jon Rose Associates submitted by SASES at Deadline 1 as part of Written Representation on Landscape and Visual. |
| LA-02.18 Whether the assessment of operational noise on ecological receptors is appropriate and sufficient | | SASES agrees with the Councils that further study and review of noise impacts from the substations is required. SASES considers that that the receptors should be expanded from wild creatures such as birds and bats to include other domestic animals, such as horses, dogs and other farm animals which are commonly kept in areas close to the substations. The study should also include effects on dogs being exercised on the PRoW network. |

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| A-02.23 Biodiversity Net Gain | | SASES questions whether the Applicants have properly considered ecological enhancement or achieved parity with the existing level of biodiversity. |
| LA-03.08 & LA-03.09 Whether assessment of impacts for operational phase at the substations site are appropriate. | | SASES has concerns that the Applicants' assessment of noise is understated. See report on Operational Noise Impact from Rupert Taylor submitted by SASES at Deadline 1. |
| FLOOD RISK | | |
| LA05.05 | | The notes in relation to the statement indicate that that a worst-case infiltration rate of 10 mm/h (3x10 – 6m/s) will be adequate. This is not reasonable. Further infiltration testing should take place pre-consent. |
| LA05.12 | | The Applicant's note would indicate that the Applicant does not recognise the need for turbidity clarification. |
| ARCHAEOLOGY & CULTURAL HERITAGE (as it relates to footpaths) | | |
| LA-06.06 Whether the ES includes sufficient information in relation to archaeology and cultural heritage. | | SASES requests that a full assessment is carried out of the Parish/Hundred Boundary and its relationship to Listed Buildings and the historical context of Friston Moor, to include appropriate archaeological investigation and consideration of the historic landscape. SASES however does not agree that the provision of a historical booklet and "outreach" is in any way adequate mitigation for the loss of this Heritage Asset. It should be noted that a book entitled "Friston – A Short History of a Suffolk Village" was published in 2000 and documents this Boundary back to the 7 th Century |
| LA-07.01, LA-07.02 & LA-07.04 | | See comment on LA-06.06 above. SASES are further concerned about the loss of an Important Hedgerow along PB1. |

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| Whether there is sufficient information regarding heritage setting. | | |
| HUMAN HEALTH | | SASES notes that there has been no SoCG submitted in respect of Human Health and is concerned that the health benefits offered by the existing Public Rights of Way, both on the substation site and through the entire cable route, have not yet been discussed. In SASES' view the loss of amenity to residents and visitors, in relation to exercise in a tranquil and uplifting environment, will have significant effects on health. |

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| TRAFFIC & TRANSPORT | | |
| LA-10.04 Methodology | The GEART assessment methodology used for the EIA is an appropriate and acceptable approach to assessing potential impacts of the Projects. | Agree ESC/SCC position that GEART methodology is too coarse a tool for these projects |
| LA-10.08.....Methodology | The assessment of transport and traffic impacts based on an assumed commencement of construction year of 2023 is an acceptable assumption | Agree with ESC/SCC that evidence is needed to show effect of later start date on driver delay |
| LA-10.11...Methodology | The assumed vehicle occupancy rate within the OTP (APP-588) is acceptable. | SASES has residual concerns regarding employee vehicle movements and risk of 'fly-parking' |
| LA-10.13 Assessment Conclusions | The conclusions of the assessment of construction phase impacts upon pedestrian amenity presented are acceptable. | SASES continues to have concerns regarding impact of increased traffic on pedestrian amenity |

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| LA-10.14 Assessment Conclusions | The conclusions of the assessment of construction phase impacts upon link severance presented are acceptable. | SASES has residual concerns regarding impact of increased traffic on link severance |
| LA-10.15 Assessment Conclusion | The conclusions of the assessment of construction phase impacts upon road safety presented are acceptable. | SASES has residual concerns regarding impact of increased traffic upon on road safety, particularly at the Friday Street junction on the A12 and the local minor road network |
| LA-10.16 Assessment Conclusions | The conclusions of the assessment of construction phase impacts upon driver delay in terms of capacity presented are acceptable. | SASES has residual concerns regarding impact of increased traffic (particularly HGVs) upon driver delay at the Friday Street junction and at other junctions on the local minor road network. |
| LA-10.18 Assessment Conclusions | The conclusions of the assessment of impacts for operation presented are acceptable. | SASES notes that presence of below-road structures such as culverts appears to be absent from SPR submission Regarding the securing of the AIL delivery route see also comment on LA-36 below. |
| LA-10.24 Mitigation | The measures to reduce travel by single-occupancy vehicles presented within the OTP (APP-588) are acceptable and sufficient to mitigate traffic and transport impacts to an acceptable level | See comment to LA-10.11 above |
| LA-10.25 Mitigation | The mitigation in relation to Friday Street Junction set out within the assessments and the proposals for a traffic light system coupled with speed limit reduction are acceptable and sufficient subject to | SASES views with deep concern the introduction of traffic lights at the Friday Street junction and the potential to disrupt severely traffic flow over a wide area. |

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| | detailed design and technical appraisal to mitigate traffic and transport impacts to an acceptable level | |
| LA-10.36 Operational AIL Routes | The approach to securing designated AIL and HGV routes during the operation and decommissioning phase of the Projects is appropriate and acceptable. | SASES remains concerned that AIL activity may be needed throughout during the operational life of the substation and agree with SSC/ESC that future use of agreed routes should be secured. |

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| PUBLIC RIGHTS OF WAY LA-15.01 | | SASES agrees with the Councils that the Applicant has not properly assessed the PRow network and its importance and usage. This may be a subject which merits investigation at an issue specific hearing. |
| LA-15.02 Impact Assessment | | SASES agrees that access and amenity should be assessed as a subject in its own right, rather than divided across other Chapters of the ES. SASES strongly supports the Councils that the impact on the PRow network around the substation site has been underestimated by the Applicant. The future amenity to residents of Friston will be substantially reduced and the experience of the PRow network totally changed. |
| LA-15.05 | | SASES has concerns regarding the proposals being discussed between the Councils and the Applicant regarding changes to the PRow network around the substations. It is not agreed by SASES that an amenity area (such as a field) for a period of 10 years is sufficient mitigation for the loss of the PRow network during construction of the substations. |
| LA-15.06 | | SASES agrees with the Councils that there has been no satisfactory assessment of the user experience on the proposed new PRow network at Friston. SASES disputes the Applicants' position that new planting and landscaping will mitigate the significant impact of the substations on users |

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| | | of the footpath network. SASES notes the lack of assessment in the LVIA and absence of any illustrative viewpoints along the route and considers these should be brought into the Examination. |
| LA-15.10 Mitigation | | SASES notes that the Councils and the Applicant are in discussions regarding amendments to the PRow arrangements at the substation site and regrets that this has not yet been discussed with the residents of Friston, who will be the users of the network. SASES trusts that proper consultation will take place with village residents before any agreement is made and include an updated plan prepared by the Applicant for proper discussion. SASES objects to an agreement being made between the Councils and the Applicant before a plan is produced and widely consulted on. SASES also cannot agree that the provision of an amenity space for a period of 10 years is acceptable mitigation for the loss of the PRow network during the construction phase. |