

## SPR EA1N and EA2 PROJECTS



### DEADLINE 2 – COMMENTS ON EXQ1 RESPONSES - 1.10 LANDSCAPE

**Interested Party:** SASES

**IP Reference Nos.** 20024106 and 20024110

**Issue:** 1

Reference	Party	Question	Response	SASES Comment
1.10.1	The Applicant	<p><b>The approach to landscape mitigation</b></p> <p>The OLEMS [APP-584] discusses the approaches to mitigation, concluding that a combination of hidden and integrated is appropriate. It is concluded that:</p> <p>“69. Woodland blocks to the south of the onshore substation and National Grid substation are intended to provide screening for the main visual receptors on the northern edges of Friston.”</p>	<p>a) It is noted that the onshore substations remain relatively visible from VP2 on the Public Right of Way (PRoW) on the northern edge of Friston (off Church Road), even at Year 15. The ‘hidden’ and ‘integrated’ approaches are referred to in the <b><i>Outline Landscape and Ecological Management Strategy</i></b> (OLEMS) (APP-584) as overall landscape design concepts that guide the Outline Landscape Mitigation Plan (OLMP) (part of the <b><i>OLEMS</i></b> (APP-584)). Specifically, in respect of VP2 and the landscape to the north of Friston, the ‘integrated’ approach is more evident (i.e. the provision of some screening through a mix of woodland belts, tree lines and hedges, with some visibility of the onshore substations remaining available through the tree lines</p>	<p>This answer reinforces the fact that due to the location close to the village of Friston, and in particular the very sensitive northern edge of Friston, there is no mitigation that would be adequate.</p> <p>Adopting the hidden approach, here would result in significant harm to the setting of the village, and loss of amenity. Different to, but as potentially as harmful to the existing landscape character, as views of the substations will be.</p> <p>The LVIA identifies <b>major</b> or <b>moderate/major harm</b> to this landscape even after 15 years. This however is not set out transparently in the LVIA due to the decision to only identify impacts as either significant or not significant.</p>

		<p>Notwithstanding any conclusions that might be made in respect of pylons and cables, LVIA VP 1 and 3 identify that at year 15 there is the potential for significant screening to be in-situ. However, montages from VP2 on the PROW appear to result in the infrastructure remaining relatively visible, even at year 15.</p> <p>a) Within the context of seeking to reflect historic field patterns, clarify the position in respect of mitigation planting in this location? Specifically, does it follow the hidden or integrated approach</p> <p>b) Do the indicated montages indicate that the proposed mitigation measures would be effective?</p>	<p>and above hedges/planted woodlands). This approach evolved as the preferred OLMP approach in this area through consultations with stakeholders, provided by the OLMP technical working group and Landscape and Visual Impact Assessment (LVIA) Expert Topic Group (ETG), seeking to be historically appropriate and avoiding tree belts placed hard against the village edge / footpaths / farmsteads, in order to maintain the open agricultural setting of the village and limiting, insofar as possible, character change through the introduction of more extensive woodland in closer proximity to Friston (the 'hidden' approach, which may provide a greater degree of visual screening).</p>	
<b>1.10.2</b>	Any IP and the Applicant	<p>A number of RRs raise concerns about the visual impact of development on Friston, with reference to the adequacy of mitigation.</p> <ul style="list-style-type: none"> <li>Is further mitigation required and what form might this take? Would additional</li> </ul>	<p>The Applicants note concerns about the visual impact of development on Friston. The Applicants would highlight that these visual effects principally occur on receptors in a limited area on the northern edge of Friston (Church Road area) and the PROW leading north out of the village, and to a lesser degree from the main area of the settlement developed slightly to the south from the church in the triangular shape of an infilled green. This main area of Friston is set back at greater distance</p>	<p>The Applicant's answer here does not properly reflect the importance of what is described rather dismissively as '<i>a limited area on the northern edge of Friston and the PROW leading north out of the village</i>'. This description does not acknowledge the historic importance and the amenity value of this area.</p> <p>No reference is made to the adverse visual impact on properties in the Aldeburgh Road near to the Old School, for which the current tree planting and other</p>

		planting of trees and hedgerows be an appropriate method to resolve this? What form might additional planting take?	from the onshore infrastructure than the dispersed northern edge of the village, separated by the village green (Viewpoint 6 – <b>Figure 28.18a-e</b> ), areas of common land around St Mary’s Church, modern housing on Church Road / Hillcrest and Friston House Wood and the Saxmundham-Aldeburgh Road (B1121) ( <b>Figure 29.21a-e</b> ).	proposals provide no mitigation according to the ES impact assessments  Comments on further/ alternative mitigation measures will be made after the submission of the updated OLMP General Arrangement (APP-401) at Deadline 3 but it is evident that a number of these measure have been considered and rejected because in themselves they have potentially harmful impacts on the landscape.
<b>1.10.4</b>	The Applicant	<p>The ExA note that while a more interventionist approach to visual impact (e.g. bunding) may have more impact on landscape character than the proposed developments they may achieve more in terms of reducing visual effects in the vicinity of the proposed substations.</p> <p>a) Were more substantial landscaping alterations considered as a way to resolve visual impacts (i.e. bunding etc)?</p> <p>b) If so, why were they discounted, and what assessment took place of the balance between potentially altering landscape character more fundamentally and reducing visual effects?</p>	The potential for more substantial landscape earthwork alterations (i.e. bunding) was considered as part of the project design process and discussed with the Councils. The potential for substantial landscape screening bunds was considered as potential further mitigation during the LVIA and modelled by the project civil engineers. The volume of sub-soil required for substantial screening bunds was found to be considerably greater than that generated by the formation of the substation platform, involving major earthworks operations, transportation of material from the full project area to the substation location and would require notable amounts of plant and time to construct. Major screening earthworks were discounted on this basis but were also considered likely to result in potentially intrusive effects on local landscape character and topography.	<p>Comments on further/ alternative mitigation measures will be made after the submission of the updated OLMP General Arrangement (APP-401) at Deadline 3 but it is evident that a number of these measure have been considered and rejected because in themselves they have potentially harmful impacts on the landscape.</p> <p>Unplanted 3m high soil bunds that would be in place for 25 years plus are not considered acceptable.</p> <p>The usability of PRowS needs to be considered carefully in relation to any changes to ground levels.</p>

1.10.5	The Applicant	<p>Various references have been made [including, but not limited to RR-320, RR-322, RR-182] to the Rampion OWF onshore substation and it being of a lower height than is proposed within the proposed developments.</p> <p>a) Provide a commentary on this, focusing on, but not necessarily limiting a response to:</p> <ul style="list-style-type: none"> <li>•technology;</li> <li>•capacity;</li> <li>•scale (height/footprint); and</li> <li>•approach to design, including post consent requirements</li> </ul>	<p><b>SPR</b></p> <p>The Applicants note the comparisons with the Rampion offshore windfarm. The built capacity of the Rampion project was (400MW) compared to the East Anglia TWO project (900MW at the point of connection to the national electricity grid) and East Anglia ONE North project (800MW at the point of connection to the national electricity grid).</p> <p>Rampion was consented with a capacity of 700MW, which is comparable to the Projects. The Development Consent Order (DCO)1for the Rampion Offshore windfarm states;</p> <p>(2) No building comprised in Work No. 25 shall exceed 6 metres in height above existing ground level and nor shall it exceed a footprint of 560m2.</p> <p>(3) No external equipment comprised in Work No. 25 shall exceed 10.5 metres in height above existing ground</p> <p>Rampion utilises Gas Insulated Switchgear (GIS) within its substation design, this is also the case with the Projects.</p> <p>The difference in the maximum building and external equipment heights stated</p>	<ol style="list-style-type: none"> <li>1. It is stated in the Application [APP-052] p19, Table 4.3, that a transmission voltage of 220kV is to be used for EA1N and EA2.</li> <li>2. The Applicant has not commented on the proposed 18m height of the harmonic filters for EA1N and EA2 which the Rampion project proposes accommodating within an 8.3m limit for its 700MW substation design. See Ref. 1 for details</li> <li>3. SASES is aware of lower profile GIS equipment being made available by at least one major supplier. Has use of this been considered?</li> <li>4. It is in an effort to bring closure to this issue that SASES proposes that the power electrical as well as aesthetic design of the SPR and NGET infrastructure should be subject to independent review by an agreed technically qualified body, which amongst other things should be charged with ensuring the visual impacts of the proposed substations are minimised so far as is reasonably possible.</li> </ol>

			<p>within the respective DCOs can be driven by a number of factors.</p> <p>Of these, one key difference between Rampion and the Projects is the transmission voltage. The transmission voltage of the Projects would be 275kV. The transmission voltage for Rampion is 150kV. A greater transmission voltage combined with the power rating of the respective transformers results in greater building and equipment heights being required. This is primarily for safety clearance reasons. The DCO for the Projects contains the following requirement; Detailed design parameters onshore12.—(1) No stage of Work No. 30 may commence until details of the layout, scale and external appearance of the onshore substation have been submitted to and approved by the relevant planning authority. Work No. 30 must be carried out in accordance with the approved details.(2) Any details provided by the undertaker pursuant to paragraph (1) must accord with the outline onshore substation design principles statement and be within the Order limits. The Applicants will continue to progress substation design matters including, post consent, through the discharge of this requirement and the production of a final substation design.</p>	
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<p><b>1.10.6</b></p>	<p>The Applicant</p>	<p>It is noted [APP-077] that up to 0.9ha of woodland north of Fitches Lane will be felled as part of the onshore cable construction.</p> <p>It is the ExA's understanding that the Applicant has committed to reducing the onshore cable route to 16.1m at this point in combination for both proposed projects, to retain as many trees as possible at this location.</p> <p>a) Confirm that this understanding is correct or provide clarification if not.</p> <p>It is not clear to the ExA if the reinstatement for this section of the proposed works would be new planted woodland (reinstatement) or heathland established over the onshore cables and woodland planting along the outer edges</p> <p>b) Confirm the details for the proposed mitigation for the removed area of woodlands north of Fitches Lane</p>	<p>Saxmundham-Aldeburgh Road (B1121) (Figure 29.21a-e).The Applicants note the potential to provide further mitigation of the visual effects of the onshore substations in views from the northern edge of Friston, such as VP2(Figure 29.14(APP-405)).The Applicants considers that the form of this mitigation could include:</p> <ul style="list-style-type: none"> <li>•Additional planting of field boundary trees and hedgerows;</li> <li>•Additional 'covert' woodland block/belt planting at closer proximity to VP2 / Friston; and/or</li> <li>• Subject to the availability of suitable material onsite, formation of soil formed earthworks to raise ground level contours in the area to the south of the onshore substations. The Applicants considers that in order for the visual effects to be notably reduced, or potentially avoided, over the long-term, more substantial woodland planting at closer proximity to Friston, as represented in VP2(Figure 29.14(APP-405)),would be required. This could potentially take the form of 'covert' woodland blocks planted at strategic locations, or a more continuous woodland belt planting along the closest field boundary to the north of Church Road/the PRoW, visible in VP2(Figure 29.14(APP-405)) (rather than individual field boundary trees, as</li> </ul>	<p>We do not feel that the Applicant's answer has properly addressed the ExA's question.</p> <p>The ES is not clear and has erroneously given the impression that the cable width north of Fitches Lane will be only 16.1m wide.</p> <p>The Applicant in their answer acknowledges that it will in fact be 27.1m wide if both projects are constructed. However, in part (d) of their answer the Applicant states that '<i>planting of deciduous trees would likely need to be kept to the outer edges of the 16.1m cable corridor and potentially to one side</i>'. In fact, it would be to the outer edges of a 27.1m wide corridor.</p>
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		<p>c) If mitigation would be proposed heathland, assess the landscape effects, including assessing the likely visibility to receptors, of providing a 16.1m strip (dependent on answer to part a)) of fairly open heathland in the middle of an existing woodland?</p> <p>d) Would woodland planting along outer edges be a realistic proposition given the future potential impact of the roots of the proposed trees?</p> <p>ES Appendix 29.3 [APP-567, APP-567], section 29.3.1 states that the magnitude of change to the perceived landscape character in the vicinity of this woodland, at 5 years post construction, once the replanted areas have established, is assessed as being low and the impact is not considered significant.</p> <p>e) Explain why 5 years is considered enough time for mitigation measures to establish themselves and for the impact to change from significant (during the first year) to not significant after 5 years?</p>	<p>currently proposed). The former approach was proposed in the earlier drafts of the OLMP at Preliminary Environmental Information Report (PEIR)(PEIR Figure 29.11), however the landscape proposals evolved following PEIR in consultation with stakeholders to move the planting further north, to avoid such close-up planting, on the basis of preference to maintain the open agricultural setting of the village and its historical setting. The Applicants consider that additional planting of this form would be an appropriate method to further mitigate the visual impact of the onshore substations in views from the northern edge of Friston, while accepting that this approach may have an impact in itself in changing the 'open' landscape character and the historic setting of the village. On balance, and based on consultation feedback, the Applicants preferred the retention and enhancement of character, but recognise others may have different view. The Applicants have proposed the acquisition of sufficient land to provide this additional planting and if this were to be preferred, it could be required through the approval of the LMP. The Applicants consider that there is also potential for further mitigation through the formation of soil formed earthworks(i.e. 'bundings')to raise ground level contours in certain areas to the immediate south of the onshore substations, potentially to coincide with woodland planted</p>	
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1.10.7	The Applicant	<p>ES Chapter 29 [APP-077], paragraph 19 states that offsite highway improvements are part of the onshore preparation works which will take place prior of the commencement of main construction. It is set out that detailed assessment of these works does not form part of the assessment of construction impacts. It is also considered that these works would be undertaken in consultation and in accordance with the requirements of the local Highways Authority as per the dDCO.</p> <p>Paragraph 21 states that the offsite highway improvement will have a small footprint, temporary nature and limited intrusive elements and therefore it is not considered by the</p>	<p><i>Not reproduced</i></p>	<p>In their answer to this question the Applicant states that '<i>Given the distance of these works from the onshore development area, there are no pathways for additive impact with the wider works (i.e. no inter-visibility)</i>'</p> <p>Inter-visibility is not the only way in which cumulative effects occur. Road widening and structural works to accommodate Abnormal Indivisible Loads are likely to have incremental impacts on the overall rural character of the local road network resulting in an erosion of the existing character.</p>



		<p>applicants that they will give rise to landscape and visual impacts.</p> <p>a) Clarify that “offsite highway improvements”, means Works No. 35 to 37 as listed in the dDCO (Schedule 1 – Approved Works)?</p> <p>If so, the dDCO allows for widening of highways and vegetation clearance.</p> <p>b) Explain how these works are unlikely to give rise to landscape and visual impacts?</p> <p>c) Explain the rationale behind excluding these works from the assessment?</p>		
<b>1.10.8</b>	The Applicant	<p>ES Chapter 29, paragraph 41 [APP-077] and the OLEMS, paragraph 81 [APP-584] contains the assumptions used for vegetation growth rates. These predictions have been used in the production of the photomontages, illustrating the effectiveness of the planting at year 15. It is stated in the OLEMS (paragraph 84) that heights of taller trees at 15 years post</p>	<i>Not reproduced</i>	<p>The Applicant states that they consider the growth rates</p> <p>They have used ‘<i>are appropriate and achievable</i>’ but this is merely an assertion. No evidence has been provided to support this assertion. In contrast SASES and ES have both provided evidence to support their belief that the growth rates used in the photomontages are not realistic.</p>

	<p>planting are based on an assumption of planting 60cm cell grown plants, with an average annual growth rate of 30cm per year for the first 5 years and 50cm per year for the next 10 years. These assumptions are based on guidance produced by IEMA in 2019. As such the growth rates reported in the OLEMS and the LVIA chapters are a “rule of thumb” to establish growth rate without considering local conditions.</p> <p>ES Chapter 29, paragraph 68 states that the magnitude of change (for both landscape and visual impacts) is assessed at 15 years post planting which results in the assessment of residual impact significance. This is based on the assumption that the planting will be successful at the growth rates provided at paragraphs 81 – 84 of the OLEMS.</p> <p>It is therefore unclear whether this can be considered a worst case scenario in term of assumed growth rates for the purpose of the EIA.</p>		<p>Other NSIPs have been located in other wetter parts of the UK.</p> <p>SASES will review with interest the revised photomontages at Deadline 3.</p>
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		<p>Various representations, including from the County Council, ESC and Friston PC also consider that the assumed growth rates are not reasonably justified in the prevailing local conditions given local soil and climatic conditions. The ExA note the applicants' comments on the RRs [AS-036].</p> <p>a) Explain the confidence it has in the growth rates for proposed planting assumed for the purposes of the assessment and in the photomontages provided?</p> <p>b) To what extent have these assumptions taken into account the specific growing conditions, including local conditions of soil, drainage, and climate, for relevant species at any particular location?</p> <p>c) What effect would a more cautious approach to growth rates have on the submitted montages?</p> <p>The use of professional judgement should be clearly stated and explained.</p>		
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<p><b>1.10.10</b></p>	<p>The Applicant</p>	<p>ES Chapter 29, paragraph 52 [APP-077] (Section 29.3.4 Monitoring) states that where monitoring is proposed in regard to maintenance of any proposed planting this is described in the OLEMS [APP-584]. However, the OLEMS paragraph 311 (section 9) states that the requirement for, and final appropriate design and scope, of monitoring will be agreed with the LPA and included within the relevant management plan(s), submitted for approval to discharge relevant DCO requirements, prior to construction works commencing. The OLEMS does not provide any indication of the management provisions for all tree and shrubs, should planting fail.</p> <p>a) Explain what measures are in place to identify and address failure or below assumed growth rate performance within the proposed planting design? If no such measures exist is the applicant content that the assumptions applied in the ES support this potential outcome</p> <p>b) What are the management provisions for all tree and shrub planting types from year 5 onwards, and the proposed</p>	<p><i>Not reproduced</i></p>	<p>Given there could be three separate parties (there is no guarantee that EA1N and EA2 will remain under common ownership) who own infrastructure at the Site, it needs to be clarified that all parties will be jointly and severally liable for the maintenance at the site for the duration of the presence of the infrastructure at the site whether it is operational or not.</p>
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		end date for management activities? Explain how any such provisions would be secured in the DCO, or suggest amendments to ensure that they are.		
<b>1.10.11</b>	The Applicant	What additional mitigation measures have been considered (other than as contained within the OLEMS) and if others were considered, why have none been proposed?	The use of larger sized standard or feathered tree stock selection for planting within woodland areas was considered (potentially in smaller numbers in key areas), as a way of creating more expedient visual screening. The current OLEMS (APP-584) proposals favour planting of younger, smaller trees (whips) which increase the chance of initial success of plant establishment, subsequent growth and overall success of the OLMP planting scheme.	Planting a smaller number of larger sized standard or feathered trees in key areas will not reduce the likely success of the younger, smaller trees (whips) but would provide some more immediately visual screening. (E.g Vp 1)
<b>1.10.12</b>	The Applicant	ES LVIA Chapter 29, paragraph 180 [APP-077] states that while the Ancient Claylands LCT is sensitive to changes from large scale development, the visual containment of the LCT by extensive woodland blocks, tree belts and hedges reduces the susceptibility of this LCT to changes arising from the onshore infrastructure. The Conclusions of the chapter (paragraph 266) reaffirm that the proposed onshore substations and National Grid infrastructure is located within a landscape with	<i>Not reproduced</i>	The existing woodland blocks in the landscape are not accurately described as being “extensive”.  The Applicant fails to mention that this unnamed “covert”, which includes a pit, will be lost by the construction of the EA1N substation. This is a very pleasant feature when walking the PRoW and would provide some screening.

		<p>extensive mature woodland of large scale. The OLEMS [APP-584] states that the Outline Landscape Management Plan (OLMP) would seek to be historically appropriate.</p> <p>The ExA note from submitted plans the woodland in the vicinity of the proposals largely consists of Laurel Covert, Grove Wood, and trees to the east of Friston House.</p> <ul style="list-style-type: none"> <li>a) Do you agree with the description of the existing woodland?</li> <li>b) If so, do you maintain that such woodland amounts to 'extensive' woodlands blocks?</li> <li>c) What would be the adverse effects of creating large areas of new 'Covert' woods to shield the proposals in terms of landscape character? Has any assessment taken place of any such effects?</li> <li>d) Would such new Covert woods be historically appropriate given the stated local characteristic of a network of small-scale fields to the north of Friston, with strong hedgerow field boundaries and scattered</li> </ul>		
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		mature deciduous field boundary trees? If so, why, or if not, why not?		
<b>1.10.13</b>	The Applicant, Natural England	<p>ES Chapter 29, paragraph 180 [APP-077] sets out that the susceptibility of the Ancient Claylands LCT is reduced as the landscape is influenced by the presence of the existing double row of high-voltage overhead transmission lines, with changes experienced in the context of existing electrical infrastructure and large-scale elements.</p> <p>However, there is a clear difference between a double row of high level largely see through transmission lines when compared to the proposed extent and density of ground level infrastructure.</p> <p>a) To what extent do you consider that the susceptibility of the Ancient Claylands LCT to change is reduced by the presence of the existing overhead transmission lines?</p> <p>b) Compare and contrast in landscape character terms the existing effects of the</p>	<i>Not reproduced</i>	<p>The Appellant's answer does not fairly '<i>Compare and contrast in landscape character terms the existing effects of the overhead transmission lines and the proposed substation development.</i>'</p> <p>The overhead transmission lines are a detractor in the landscape but they allow the underlying landscape to remain and to retain much of its character and value. This is evidenced by the description of the existing character of the landscape north of Friston in the LVIA:</p> <p><i>'The local landscape in the Friston area has a strong sense of place and local distinctiveness, with value deriving from the setting of the landscape to the parish of Friston, the characteristic arrangement of this parish, the village and outlying farmsteads in the open agricultural setting with a simple, rural character, network of fields with strong hedgerow field boundaries, scattered mature deciduous field boundary trees and distinctive backdrop of ancient woodland (Grove Wood).'</i> (Para 179)</p> <p>The substations would result in the loss of this strong sense of place and local distinctiveness and Friston would come to be defined by the presence of large-scale energy infrastructure.</p>

		<p>overhead transmission lines and the proposed substation development.</p> <p>To Natural England:</p> <p>c) Do you agree with the applicant's assessment of the susceptibility of the Ancient Claylands LCT to changes arising from the proposed developments?</p>		
1.10.16	The Applicant	<p>The conclusions of the ES Chapter 29 [APP-077 note that it is considered that there is scope for the onshore infrastructure to be accommodated in the landscape, over the long-term, with the delivery of the landscape mitigation plan.</p> <p>a) In this respect define the terms 'accommodated' and 'long term'.</p> <p>b) Is such accommodation sufficient to adequately mitigate the adverse effects on the quality of landscape and the visual impact of the new infrastructure? How can</p>	<i>Not reproduced</i>	<p>The onshore infrastructure cannot be 'accommodated' in either the short or long term.</p> <p>Accommodation refers to the ability of the landscape 'to accommodate proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies' (GLVIA 3 Page 88 Paragraph 5.40)</p> <p>The substations will result in <b>major</b> or <b>moderate/major</b> permanent adverse impacts on the baseline situation and would be incapable of achieving landscape policies or strategies. Consequently they cannot be 'accommodated'. This is the result of a flawed selection process which did not accurately identify the landscape sensitivity. The sensitivity of this landscape (acknowledged by the</p>



		<p>this mitigation be secured, monitored, and assessed?</p>		<p>LVIA to be medium/high) is such that the impacts cannot be satisfactorily mitigated. The Applicant's response that this is inevitable in the context of virtually all Nationally Significant Infrastructure Projects is not correct. Not all landscapes are as sensitive to such development as this one is acknowledged to be.</p>
<p><b>1.10.17</b></p>	<p>The Applicant</p>	<p>ES Chapter 29 [APP-077] Table 29.1 states that "Lighting effects associated with the construction works and onshore infrastructure have been taken into account within the assessment methodology. More detail is provided in Appendix 29.2 Operational impacts (including lighting) are considered in section 29.6.2"</p> <p>However, it is not clear to the ExA where more detail is provided in either Appendix 29.2 or section 29.6.2.</p> <p>While noting information provided in the submitted Design and Access Statements [APP-580], clarify the proposed day and night time lighting required of the onshore infrastructure, how this would be controlled both physically and</p>	<p><i>Not reproduced</i></p>	<p>Given the importance of protecting the "dark skies" environment the artificial light emissions plan in respect of construction impacts should be submitted and approved by the local authority prior to any development consent being granted, NOT prior to commencement as requested by the Applicant.</p> <p>The East Suffolk Council and Suffolk County Council Joint Local Impact Report at paragraphs 8.2,8.4, 8.5 and 8.6 indicate the importance of protecting the dark skies environment and night time tranquillity.</p> <p>The operational lighting plan should be agreed as part of the design process of the substation infrastructure not as an afterthought prior to operation of the infrastructure to ensure to ensure the applicant does its best to eliminate light pollution.</p> <p>It should be noted that in the opening paragraph of the Applicant's response it admits that there are "nearby residential properties", whereas in the Applicant's Non –Technical Summary pg. 48, paragraph 156 –Human Health" it stated that "The proposed on-shore development is largely comprised of agricultural land and has been sited</p>

		through the DCO, and if any is necessary, the visual effects of such lighting on key receptors.		away from population centres and sensitive receptors”. <b>PRoW</b> The impact of passive infrared lighting and CCTV on PRoW users should be considered. PIR lighting can be triggered when light is poor (when people may still be walking) not just at night time. CCTV and such lighting will act as a deterrent to use of PRoWs and result in a significant loss of amenity. PIR lighting and CCTV should be designed so that it is not triggered by use of the PRoW network and nobody using the PRoW network should be recorded on CCTV.
<b>1.10.18</b>	The Applicant	The ExA noted on their unaccompanied site visits [EV-005, EV-006, EV-007] that the eastern side of the property at Moor Farm (NGR TM 41030 61692) has a very open aspect to the south, with open fences and a grassed lawn in front of large windows providing presumably extensive views to the south towards Friston. The applicant is requested to:  a) Assess the effect of the proposals in the context of the proposed OLMP from this vista b) Can the applicant confirm whether or not this property is	<i>Not reproduced</i>	The planting will do little to mitigate the impact on this property which will be particularly severe during construction.  The growth rates used by the Applicant are optimistic.

		curtilage listed as part of High House Farm?		
<b>1.10.19</b>	The Applicant	Submitted plans show proposed sustainable drainage system basins. Assess any effect of the such basins on the local landscape character in landscape and visual terms, where relevant.	<i>Not reproduced</i>	See SASES expert report on flood risk submitted as its written representation on flood risk. It should be noted that there will need to be a 2–3m bund at the western end of the detention pond due to the topographic slope at the proposed location i.e. that the retention pond would be above ground level at the western end. This will not be a natural looking feature in the landscape and further poses risk to footpath users by any failure of the western above ground level bund with a potential release of thousands of cubic metres of water.
<b>1.10.20</b>	The Applicant	Can the Applicant confirm whether any noise impacts of the operational sub-stations has been considered in the assessment of landscape effects?	The Applicants can confirm that noise impacts of the operational substations have not been considered in the assessment of landscape effects, for example in respect of effects on perceived tranquillity of the landscape. Effects on tranquillity as an aspect of the special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) have been considered as part of the assessment of the project on the AONB special qualities and the Applicants note that the onshore substation locations are 1.6km from the AONB at its closest point (and 3.7km from the main coastal area of the AONB) and that it is inappropriate to assess the onshore substations on this same basis. Noise impacts of the onshore infrastructure are assessed in <b>Chapter 25 Noise and Vibration</b> (APP-073).	Whilst it is not appropriate to judge the development against the special qualities of the AONB, tranquillity is not a quality restricted to the AONB. It is appropriate to consider how noise from the sub stations will affect the existing perception of rural tranquillity in this landscape.  It also needs to be remembered that the noise impacts of the operational substations will have a significant impact on users of the proposed alternative PRoW resulting in a significant loss of amenity – this will no longer be a rural walk.

1.10.21	The Applicant	Friston Parish Council raise concerns over the extent of the proposed access road. The ExA note the responses of the applicants to this point of view in their responses to the RRs [AS-036] and the technical details provided. Provide justification for the proposed length and width of the road.	<i>Not reproduced</i>	<p>The Applicants response does not provide justification for such an excessively wide access road. It should be noted that:</p> <p>a)only four AILs are required during construction and their replacement is “unlikely”. This does not justify the <u>permanent</u> existence of this width of road</p> <p>b)The requirement for “period two-way vehicle movement” can easily be controlled through traffic control given it is periodical for maintenance purposes only. It should be noted in any event that the, albeit narrow, two-way B1121 from which the operational access road will be accessed is 5.5m wide.</p> <p>c)It has previously been stated that this road will not be used for HGV traffic.</p> <p>d)There is an obvious concern that the reason for the road being proposed at this width is that it will support the future construction of the proposed expansion of the National Grid connection hub. See Written Representations on Cumulative Impact. This is supported by the fact this road is consented twice in each DCO once as part of the Applicant’s NSIP and once as part of the National Grid NSIP.</p> <p>There is no justification for this road to be permanently any more than single lane. This will reduce the landscape impact, reduce the amount of</p>

				land which will need to be compulsorily acquired and assist drainage.
<b>1.10.25</b>	The Applicant	<p><b>Photomontages</b></p> <p>The ExA noted on their unaccompanied site visits [EV-005, EV-006, EV-007] that further additional visualisations/photomontages of the proposals for the following locations would be very useful. Please produce these:</p> <ul style="list-style-type: none"> <li>a) Footpath to south of Little Moor Farm NGR TM 41293 61495</li> <li>b) Bench to north of Friston at intersection of footpaths NGR TM 41394 60679</li> <li>c) Footpath across field to south west of High House Farm/Moor Farm NGR 40860 61501</li> </ul>	<i>Not reproduced</i>	<p>PRoW - SASES considers that there will be significant adverse views from the alternative PR a W route and these need to be fully explored by the vision emotive montages as requested by the X8. With regard to C) it is now proposed by the applicant to permanently divert the route of the footpath to the south-west of Hy house farm and a photomontage from the repairs new wood should be provided.</p>
<b>1.10.26</b>	The Applicant	<p><b>Pilgrims Paths</b></p> <p>Various IPs [including but not limited to RR-445, RR-356, RR-068]] to the effect of the proposal on “pilgrims paths”. The existing footpath running north from Friston towards Little Moor Farm which will be removed</p>	<i>Not reproduced</i>	<p>ProW - SASES considers that historical associations of this trackway are important to the sense of place of Friston. The outlying farms are linked to the church, the village and each other by a circular route of which this trackway forms an essential part [check Richard Hoggett’s comments]</p>

		<p>as part of the proposals is stated to be one such path.</p> <ul style="list-style-type: none"><li>• Respond to this view. Has any assessment been taken of any additional value which a footpath may accrue by virtue of historical associations?</li></ul>		
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**References**

**Ref. 1**      **ExQs 1.10.5**      EN010032-001313-E.ON - Design and Access Statement Version 2.pdf (available on request)