



SPR EA1N and EA2 PROJECTS

DEADLINE 4 - RESPONSES TO APPLICANTS COMMENTS AT D3 ON SASES WRITTEN REPRESENTATIONS SUBMITTED AT D1

Interested Party: SASES PINS Refs: 20024106 & 20024110

Date: 13 January 2021

Issue: 2

Introduction

1. The following responses are made on the Applicants' Comments on SASES' D1 submissions [REP3-072] which are SASES' written representations. It is disappointing that the Applicants, despite their resources, did not comment in detail on SASES written representations until Deadline 3 not least because some of SASES written representations were the subject of ISH1 and ISH2. Even now their comments are incomplete as they have not responded on SASES written representations in respect of Traffic and Transport, Development Consent Order, Safety, Noise and Landscape & Visual. This can only hinder an efficient examination process and result in SASES expending more time and resource that otherwise might be necessary.
2. The fact that SASES has not responded to any particular comment made by the Applicants does not mean that SASES agrees with the comment. SASES will continue to rely on its Written Representations.
3. In relation to each topic below the responses may be in a different format due to different members of SASES reviewing the content of the Applicants' comments but it is not considered this leads to any substantial issue in terms of the clarity of the responses.

Site selection 2.1

4. SASES note the Applicants' comments and would refer to SASES post hearing summary in respect of site selection submitted at Deadline 3.¹ In addition SASES makes the following responses.
5. Colocation In ID16 on page 13 of [REP3-072] the Applicants repeat the assertion that: *'Onshore substation and National Grid substation to be positioned as close as possible to each other to deliver an efficient and economic system (colocation)'* based on *'guidance from the Horlock Rules and the Electricity Act 1989'*.
6. SASES has already disputed the need for 'colocation' in ISH2 but now further refers the Applicant to page 17 of [https://www.nationalgrid.com/sites/default/files/documents/45349-Undergrounding high voltage electricity transmission lines The technical issues INT.pdf](https://www.nationalgrid.com/sites/default/files/documents/45349-Undergrounding%20high%20voltage%20electricity%20transmission%20lines%20The%20technical%20issues%20INT.pdf) which clearly states that *'Reactive compensation to compensate for the changing current drawn by long lengths of high voltage cable may be required for lengths of cable greater than 5km.'*
7. In other words until the 5km limit is reached there should be no need for additional substation electrical equipment and many site selections will be possible which allow an *'efficient, co-ordinated and economical'* arrangement without colocation, and many of these may better satisfy the Schedule 9 obligation to *'have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiological'*

¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003219-sases%20deadline%203%20Site%20Selection%20Subs%20151220.pdf>

features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest’.

8. It follows that the Site Selection RAG approach should not have been biased against sites which did not allow or support co-location and that this was serious defect in the Site Selection Process.

Cumulative Impact 2.2

9. SASES notes the Applicants’ comments and would refer to SASES post hearing summary in respect of cumulative impact². Since ISH2 additional information has come to light which would further indicate that Friston is intended to be a national grid connection hub to which other proposed projects may well connect. See SASES Deadline 4 submission Additional Evidence relating to Cumulative Impact. In addition see SASES Deadline 4 submission Comments On National Grid Group Submissions (NGET, NGESO & NGV).

Flood Risk 2.3

10. Please see Section 3.3 of Flood Risk Related Comments on Deadline 3 Submissions prepared by GWP Consultants dated January 2021 attached at Appendix 1.

Cultural Heritage 2.4

11. The Applicants make numerous references to consultation with and acceptance by the Heritage Expert Topic Group for example (a) the scoping out of the construction and decommissioning phases from the assessment, and (b) the selection of the cultural heritage viewpoints. However notwithstanding such consultation, that does not mean the approach subsequently taken was correct or that the parties involved in the ETG process support the outcomes.

Land Use 2.5

12. The references to ID numbers below are to the ID numbers used in the Applicants Comments.
13. ID 04&05 – SASES’ point is not only is the impact major adverse but that the Applicants have not, as required by policy, sought to minimise the impact. The meaning of the word minimise is to reduce something, especially something bad, to the lowest possible level. This the Applicants have failed to do not least by their selection of an unsuitable site. The fact that the Applicants may be entering into private agreements with landowners is irrelevant to the question of whether the impact on BMV land is being minimised.
14. ID05 – it is noted that the Applicants’ are seeking to reduce the footprint of the Applicants’ substations by approximately 10%. However in the context of all the land that is required for the project not least the substantial amount of land required for mitigation this reduction is immaterial. In this connection it should be noted that overall the National Grid infrastructure has an unspecified footprint and no reduction in that is proposed.
15. ID16 – SASES commented on the Applicants’ Land Use clarification note at Deadline 3.

² <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003212-sases%20deadline%203%20Cumulative%20Impact%20Subs%20151220.pdf>

16. ID 21, 22,23, 24, 25 & 26 – the Applicants refer to the CION process which was in part the subject of submissions by SASES at ISH2 and its post hearing submission on site selection (see footnote 1 above). In their comments the Applicants fail to mention that originally the CION assessment for EA1N and EA2 resulted in a connection offer at Bramford and connection agreements were entered into in respect of that connection offer. The Applicants proffer an explanation in respect of their engagement with National Grid which is imprecise and unclear. It is also inconsistent with the explanation which National Grid gave to Suffolk County Council in a letter dated 28 October 2019. In this letter National Grid (in its NGESO guise) states in the third paragraph on page 2 that:

“The outcome of the subsequent contracts for difference auction for EA1N prompted Scottish Power Renewables to change the technology for the connection into Bramford. The technology change prompted CION review.”

17. It was of course the technology change by SPR which led to the capacity of the Bawdsey to Bramford cable route being compromised and substantially reduced.

18. National Grid further states in the fourth paragraph on page 2:

“With the reconfiguration of their offshore projects, Scottish Power Renewables requested a review of connection locations.”

19. Note it was not National Grid which sought to change the connection offer at Bramford. However it should be noted that the new connection offer in the Leiston area made by National Grid has resulted in DCO applications which will create a new National Grid connection hub at Friston.

20. A copy of this letter is attached at Appendix 2.

Substation Design and Rochdale Envelope 2.6

21. We note the Applicants’ comments and would refer to SASES post hearing submissions on design & Rochdale Envelope³. In addition we make the following responses to the Applicants comments.

22. Good Design In paragraph 4.5.4 of NPS EN-1 referring to ‘Criteria for “good design” for energy infrastructure’ it is stated that “For the IPC to consider the proposal for a project, Applicants should be able to demonstrate in their application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, Applicants should set out the reasons why the favoured choice has been selected.”

23. SASES has been unable to find any significant wording in the DCO application which describes how the substation design process was conducted and how the proposed design evolved. Therefore there is no evidence that a ‘Good Design’ process has been followed and that the current proposals are consistent with it.

24. SASES reiterates that the role of a ‘Design Champion’ or similar must be embodied in any DCO to ensure independent verification of ‘Good Design’.

³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003205-sases%20deadline%203%20Design%20Subs%20151220.pdf>

25. ID08 – it is noted that the Applicants have failed to address this issue. The relevant planning authority cannot reduce the parameters granted under the DCO.
26. ID11 – the area of the remainder of the National Grid infrastructure is not specified in the draft DCO and the design principles statement does not address the remainder of the National Grid infrastructure, cable sealing ends, pylons etc.
27. ID13 – it is noted that the Applicants only state that they would “*design the onshore substation to the capacity of the electricity required to be converted and to accommodate the technology at that time*”.
28. There is no commitment made to:
- a. reduce the size of the substations footprint and height to reflect any reduction in electricity capacity;
 - b. reduce the size of the National Grid connection hub’s footprint and height to reflect any reduction in electricity capacity of EA1N or EA2 and whether only one of EA1N or EA2 is constructed;
 - c. reduce the scale of any other works associated with the Applicants’ substations or National Grid infrastructure and related land take.
29. More fundamentally the Applicants have failed to address the matter of downsizing set out at Appendix 1 of SASES’ written representation on Rochdale Envelope and Substation Design⁴.

Footpaths 2.7

30. ID 02: The Applicants have obfuscated and avoided answering SASES’ allegation that the Friston site was the only site of the 8 sites considered that involves permanent stopping up Public Rights of Way. SASES has drawn attention to the error in the RAG Assessment that a PRow was affected at Broom Covert and the Applicant has ignored this and simply referred the ExA to ID 01 of Table 2.1 regarding Site Selection, which does not deal with PRows. The Applicants should admit this error and explain why the closure of PRows on the Friston site were not given greater significance.
31. ID 04 - 07: These responses confirm that the Applicant does not intend to keep FP6 open during the main construction works and that the proposed diversions will only operate during early enabling works on site. The Applicant has failed to answer SASES’ question of how it is possible to provide a new alternative route for pedestrians during the construction period and that the PRow will have been created to the satisfaction of the local authority.
32. ID 08: The Applicants have not explained how the new proposed PRow will interact with the Contractors Consolidation Compounds, which are shown to be sited in a similar location, and how this in turn affects the proposed pre-construction planting. Neither has the Applicant explained how the proposed reduction in ground level of 2M in this location will be related to the new PRow and Grove Road. This is a very constrained part of the site and the Applicant has not demonstrated that the stated scheme is achievable.

⁴ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002512-DL1%20-%20SASES%20WR%20rochdale%20envelope%20and%20design.pdf>

33. ID 10: SASES does not agree that the sensitivity of the footpath network over the onshore development area is **low** or that it is not significant enough to draw visitors. The Applicant has clearly misunderstood the character of the area and the reasons why it is popular with visitors.
34. ID 25: The Applicant requests further information on the location of the three PRowS in Aldringham referred to by SASES. SASES refers the Applicants and ExA to Section 4.11: “PRowS and Hedges” pages 17-18, paragraph 137 of “SASES Deadline 1 (Cable Corridor Construction) [REP1-371]” where that information is clearly laid out.
35. The Applicants have failed to respond to Paragraph 40 of SASES Deadline 1 submissions on Footpaths [REP1-346], which is repeated here for clarity:-

In particular there is a by-way open to all traffic (APP-013 - Sheet 2 of Temporary Stopping up of Public Rights of Way/SPR Footpath Ref: E-106/025/0) used by motor vehicles, horses, cyclists and walkers, linking the B1353 at Aldringham to Sizewell Beach and also forms part of the Sandlings Walk. It is proposed to close a section of this by-way to accommodate the cable route. This by-way forms an escape route in case of emergency in Sizewell. Two diversions are proposed, which increase the length of the route significantly, but it is not made clear whether these diversions would accommodate motor vehicles or other users as is permitted on the established by-way.

36. This by-way is popular with walkers, cyclists and horse-riders, as well as being used as vehicular access to remote residential properties. The British Horse Society recommends a standard width of 5M for diverted bridleways, with 4M as a minimum. This ‘byway for all traffic’ is the only alternative route from Sizewell village if Sizewell Gap Road were impassable.
37. The Applicant is asked to respond and confirm that this by-way will remain open to all traffic, including horses and vehicles, during the construction period and to address the issue of PRow E-106/025/0 being an escape route in case of emergency at the Sizewell nuclear sites or closure of Sizewell Gap Road/

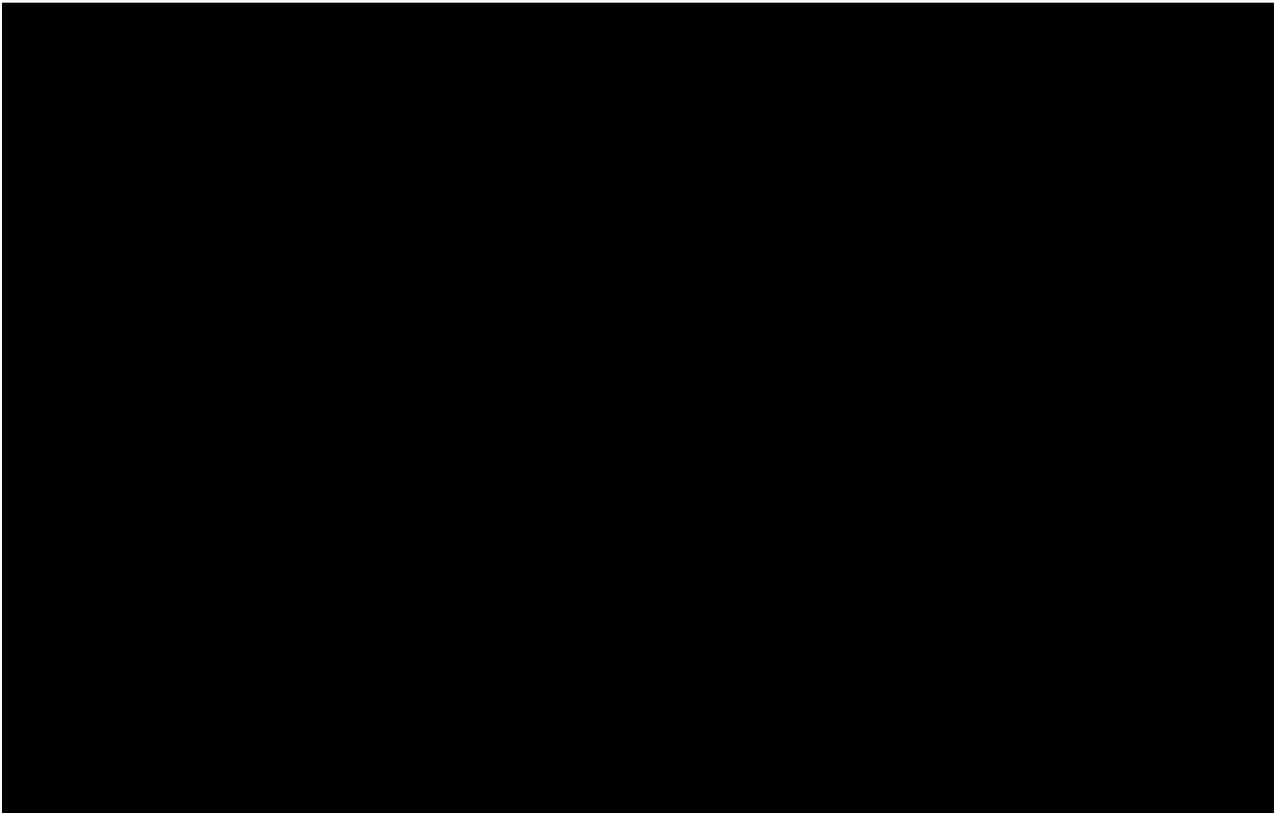
Human Health 2.8

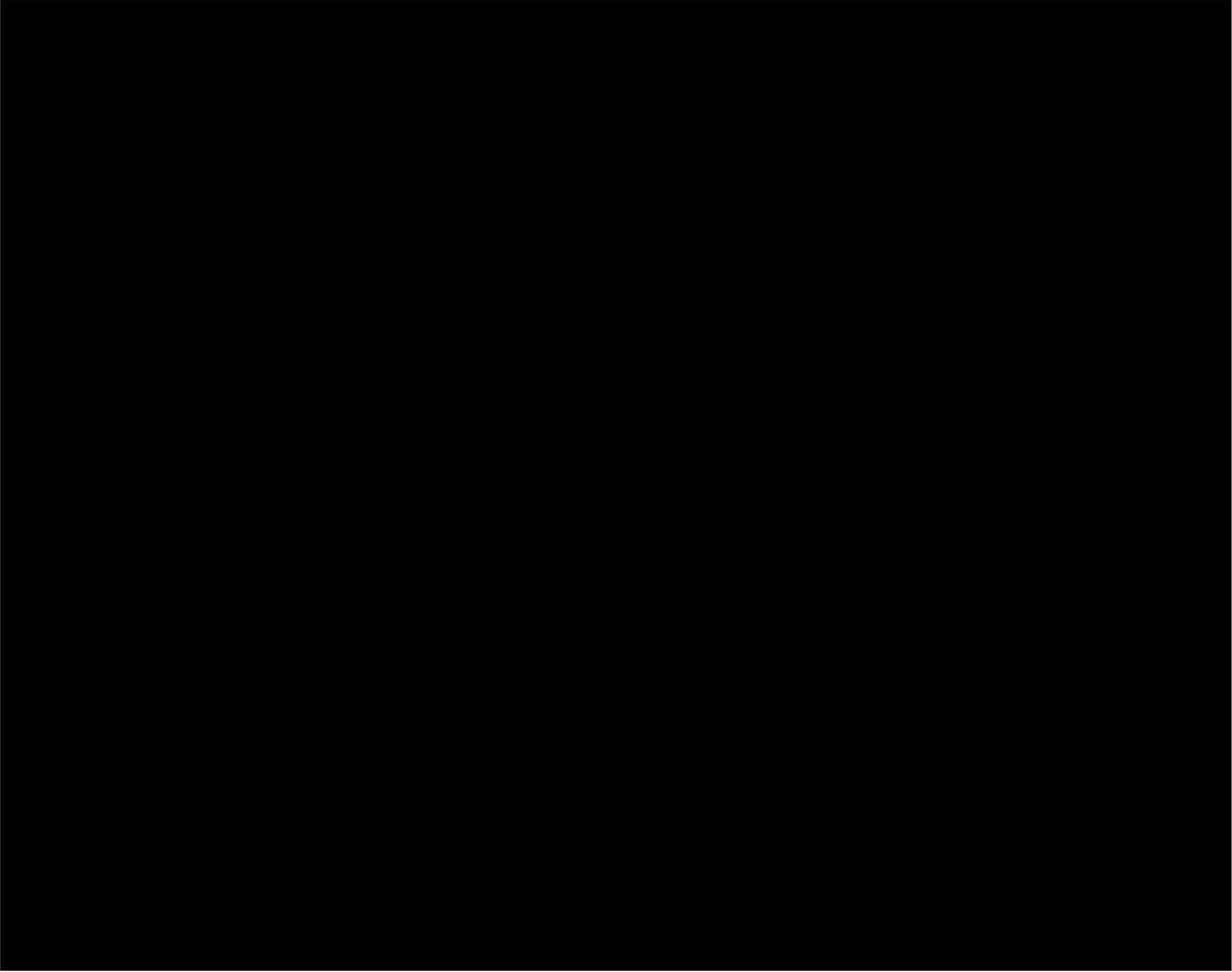
38. There are a substantial number of issues both individually and cumulatively arising from the Applicants’ proposals which impact on human health and wellbeing.
39. Further aspects of these will emerge out of the forthcoming Issue Specific Hearings 4 & 5 and further Open Floor Hearings.
40. However, SASES does wish to emphasise the growing high levels of anxiety and stress arising from the Applicants’ proposals and the further details emerging from the Examination. Adding to the stress are the ongoing Covid-19 restrictions which preclude effective communication within communities and the sense of remoteness from the Examination process, albeit the manner has been sensitively managed as far as possible by the Examining Panel and their colleagues.

41. The Applicants have claimed that they have sought to mitigate what they term as the 'perception of risk' through comprehensive public engagement and consultation. SASES has commented at length on the inadequacy of the Applicants' consultation. Given the depth and breadth of human concerns expressed within the written representations and hearings, the Applicants have manifestly failed or chosen to ignore them.
42. This does not inspire trust in the Applicants' ability to manage the developments sensitively in the event of these being approved.

Ecology 2.9

43. ID 02 – The Applicant has failed to respond on the implications of the Felling Licences issued in January 2020 for Grove Wood and is asked to consider the implications on screening and visual effects of the proposed removal and coppicing programme planned for this wood.
44. ID 04 & 05 – the Applicants have not demonstrated in the HRA that there are no "alternatives" to that of the chosen cable route and have not submitted their report on "cable route optioneering" referred to in the RAG Assessment at Appendix 4.2 of the Environmental Statement at paragraph 5 on page 3. The Applicants are asked to disclose this document as part of the assessment.
45. ID 18 – Badgers - Surveys carried out by the Applicant appear to have missed the existence of a main badger sett [REDACTED] [REDACTED] Photographs of this sett were submitted by SASES at Deadline 1 and are included again here, along with an annotated map (see below). The Applicant should explain how this sett is to be treated during the construction period, as foraging across a construction site does not seem feasible.



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46. ID 13 – The Applicants refer to their Phase 1 Habitat Survey and addendum (APP-503/APP-504), however Figures 22.4b and 22.4c of the Habitat Survey Results show very few Target Notes where the cable corridor crosses the SSSI and SPA as compared with the remainder of the onshore development area. This omission would suggest that the surveys of the designated sites were inadequate. There have been no surveys carried out with regard to the National Vegetation Classification which are necessary to ensure proper mitigation and restoration.
47. ID14 – The Applicant has classified the SSSI habitats as species-poor semi-improved grassland and dense scrub, whereas the habitat is far more diverse, being described as a mosaic of acid grassland, heathland, sand sedge, bracken, coarse grasses and scrub. Further the Applicant has not explained the absence of reptile surveys. It is likely that at the SSSI crossing that reptiles will be present. Target note TN9B identifies a 'large vegetated mound (10M x 20M), optimal feeding, basking, habitat for reptiles' at GPS TM44661. The Applicant cannot therefore claim that there is no suitable habitat for reptiles and a survey should be carried out.
48. ID 20 - The Applicant is asked to confirm whether or not the above badger sett will be included in its application for Letters of No Impediment to Natural England along with the four outlier setts within the onshore development area and that an artificial sett will be provided.

49. ID 21 – The Applicants state that they “*now consider that the main sett can be avoided so it would only be predicted to be indirectly disturbed and will therefore not require closure.*” The Applicant is asked to confirm whether it regards the main sett to be that identified on the map and photo above.
50. ID 29 – The Applicant has declined to investigate further the sighting of the rare Lesser Horseshoe Bat in the vicinity of Billeaford Hall. This is unacceptable.
51. ID 40 – The pit referred to in SASES’ submissions is that shown on the map in this document and in the photo below taken in December 2020 when seasonally flooded. This waterbody on the substation site has not been assessed for wildlife or its water storage capacity.



Wooded pit – December 2020

52. ID 46 – 50: With regard to water voles and otters, the Applicant states “*Whilst records obtained from SBIS confirm that both species have historically been present on the Hundred River, neither species were recorded at the time of the survey, and therefore mitigation for both species is not required.*” It is unsatisfactory to leave the question of mitigation for these important species to post-consent and further Phase 2 surveys should be carried out urgently prior to DCO consent. The habitat in the River Hundred area has not been considered in detail and may represent wet woodland habitat. The River Hundred is directly connected to the Sandlings SPA and SSSI (as noted by Natural England) and there could be potential impacts especially during the construction phase.

53. ID 59 – The Applicants respond as follows: “*No veteran trees have been identified as requiring removal to facilitate construction of the Projects.*” The Applicants are asked to explain what methodology was used to “identify” veteran trees. The Outline Landscape and Ecological Management Strategy states at paragraph 185: “*A pre-construction walkover survey would be undertaken by the ACoW, ECoW and an engineer Any veteran trees present within the onshore development area would be identified during this survey as well as any tree with bat roost potential....The surveys would show actual position of trees, their condition and value ... This survey can be carried out at any time of year*”. It would therefore appear that no survey to identify veteran trees has been undertaken to date. The Applicant is asked to explain.

Light Pollution 2.10

ID01 & 02

54. The Applicants refer to “sensitive receptors”. There seems to be little appreciation that in a “dark skies” environment every receptor is a sensitive receptor.

55. There are frequent references to security lighting. Yet it is stated whilst this lighting is provided, the substations would not “normally” be lit during hours of darkness. It is unclear what “normally” means. Given the lighting is “security” lighting does this mean that the substation will be lit at night or not?

56. There is a reference to standard car park lighting which might be motion sensitive. It is unclear what “standard” means or where the car parks are within the substation complex. In this context it obviously needs to be remembered that the substation complex is not manned during operation so presumably car parking provision should be minimal.

57. The Applicants refer to an “*Operational Artificial Light Emissions Management Plan being developed for the final design for the permanent infrastructure, as secured under the requirement 25 of the **draft DCO.***” Requirement 25 does not secure this requirement merely that the plan has to be agreed before operation. It is self evident that any plan in relation to lighting needs to be considered as part of the design phase as previously submitted.

Tourism and Socio-economics 2.11

Rather than comment on individual responses, SASES wishes to emphasise the following key issues.

Impacts of Sizewell C

58. It is not acceptable that the Applicants should dismiss or minimise the impact of Sizewell C on both the visitor economy and socio-economic dynamics of the area.

59. As a major participant in the energy sector, the Applicants will have long known of the scale and magnitude of the proposals for Sizewell C and should have considered them in their site selection process.
60. We are not talking about 'perceptions' but reality.
61. In December 2020 the Government published its Energy White Paper, 'Powering Our Net Zero Future' which considers nuclear as a key element and has publicly indicated its commitment to Sizewell C (notwithstanding that it is still subject to Public Examination by the Planning Inspectorate).
62. Consequently, Sizewell C is increasingly visible in media reporting. Also, there has been extensive coverage of the Hinkley Point project prior to Christmas.
63. Hinkley Point and Bradwell (another ear-marked nuclear site) are in more remote points along the Somerset and Essex coasts.
64. This does not apply to Sizewell which is at the heart of the Suffolk Heritage Coast:
65. It drives a wedge within this heavily visited part of the coast comprising AONB land, RSPB Minsmere and historic sites and villages between the popular towns of Aldeburgh to the south and Southwold to the north, a coastal stretch of just 13 miles.
66. The sheer scale and magnitude of its proposals are transformative for the area reflected in the projected timescale of 7-12 years and employing some 7,500 plus workers on site at its peak. It will be a major challenge of logistics and accommodation which will impact on the local infrastructure and social fabric.
67. These will especially impact and place pressure on the local towns of Leiston, Saxmundham (itself subject to major developments including a 'garden village' of 800 homes) and the 'resort' destinations of Aldeburgh and Southwold. The latter are especially concerned with the increase in 'second homes' as rental properties and the impact on the social fabric and provision of affordable housing for those employed in the service sector (retail, social and health care and hospitality).

Impacts of the Applicants' development 'footprint'

68. The Applicants' proposals add to the impacts of Sizewell C:
69. The landfall site at a fragile stretch of the coast and cable corridors extend from the historic holiday village of Thorpeness (just 2 miles from Aldeburgh) along a much-used coastal path embracing a care centre (Wardens Trust), a Christian Conference Centre (Sizewell Hall) and a popular family holiday centre (Beach View Holiday Park) almost adjacent to Sizewell power stations. It then wends its way through countryside in close proximity to residential areas having care homes, cultural facilities and a primary school.
70. It creates a new connection point covering 32 acres at the village of Friston less than 10 minutes' walk from the social hub of the village comprising the Village Hall and Grade II* listed Church of St Mary the Virgin.
71. All these locations and facilities will face scarring of the landscape, massive disruption and potentially permanent damage to their social objectives and viability.

72. The damage to the village of Friston is irreversible.
73. The construction impacts will place even further strain on the local infrastructure, reduces accessibility within the area and closes footpaths (temporarily or permanently) which are major attractions to visitors and not just amenities for residents.
74. The Visitor Economy
75. The Applicants continue to fail to understand the special appeal of the area and attempt to undermine the credibility of the DMO research. Not least they seem to think we should just consider their development as standalone whereas common sense is that you are bound to consider in planning the cumulative effects of all that is proposed for the area.
76. The report 'Economic Impact of Tourism, East Suffolk 2018 by Destination Research states:
77. Total number of trips (day and staying) 12.7M
78. Total Tourism Value £671.7M
79. Full time equivalent jobs 10,446.
80. The number of trips is indicative of the special appeal of the area and how it meets an important social need. Accordingly, those characteristics of the area should be managed to protect and preserve and are relative to the current government desire to preserve 'green' spaces.
81. The economic benefits are reflected in the total tourism value and number of full-time equivalent jobs.
82. The siting of massive industrial structures and scarring of the landscape and construction impacts will all be highly visible and reduce the attraction of the area for visitors (and residents).
83. Quoted comparisons with alternative sites in the UK are inappropriate since they are in more remote locations and do not have the diversity and richness of the range of recreational and cultural activities available in this area.

Investment and job opportunities

84. The overriding issue is that the site at Friston is to be a connection point in an inappropriate rural location. The apparent reason is that this minimises the costs and thereby maximises the investment return for the Applicants.
85. It is arguable whether this is productive investment. If the Applicants had adhered to their original plans, advantage could have been taken of existing facilities and closer to the vaunted supply chains. We continue to contend that rejection of the Friston site does not jeopardise the projects and the benefits that might accrue elsewhere, both within East Suffolk, the East of England and nationally. Instead, we are faced with potentially irreversible damage to the attractiveness of the area.
86. The Applicants state Full time equivalent jobs average of 167 over the construction period. There are no residual job benefits once operational at the site. These are far outweighed by the employment of 10,446 cited above.

87. Furthermore, there is an economic and social need to ensure that the area continues to be an attractive place to live. Substantial investment will arise from the considerable housing developments proposed locally (800 at Saxmundham, 400 at Woodbridge) and others across Suffolk and north Essex.

Conclusion

88. As stated in our first written representations given the statistics and conflicting statements of economic benefits it would be of assistance if a truly independent and objective expert report was put together of the socio-economic impacts on the local economy of these projects, Sizewell C and the other energy projects which are planned for this area.

Construction – substation site 2.12

ID 01 - Summary – Noise, Vibration, Light Pollution, Dust, Air Quality, Emissions, Flooding and Traffic

89. SASES ***strongly disagrees*** with the comments that the mitigation proposed by the Applicant relating to noise (deadline 4), vibration, light pollution, air quality, traffic and flooding as assessed by the Applicant is now thought to be “not significant”.

90. SASES requests further design work, analysis, modelling, acoustic modelling and site investigation design works are required to convince the Planning Inspectorate and SASES that the proposed minor changes suggested will reduce environmental impact. Particularly now as the proposal to reduce ground levels will result in additional excavation and earth movements impacting on additional noise and traffic on local roads with increased NO2 emissions and particulate pollution.

91. SASES understands that a response to noise is expected at deadline four and it is hoped further mitigation will follow although some points of concern have not been covered in the Outline Code of Construction Practice (as amended). Such critical decision making criteria cannot and should not be passed to designers and contractors post approval – the Applicant needs to do some of this investigative and design work ***before*** the DCO is given approval to proceed, should the Planning Inspectorate decide to recommend the application to proceed.

92. There appears to no mention or intent to use acoustic baffles along the cable corridor to shield the village as a result of extensive excavations and construction noise for many months and years. SASES has not seen anything convincing set out in the minor changes proposed under the new mitigation proposals that make any significant difference to the environmental impact upon the village or the cable corridor. This reinforces the previous points raised about inappropriate site selection.

93. The Outline Code of Construction Practice has been amended and resubmitted. However, the proposed mitigation and enhanced provisions do not sufficiently reduce the impacts raised by SASES which the Applicant now states as being “not significant”. SASES strongly refutes the statement.

ID 02 – Summary – Local Impact Concerns

94. The Applicant explains the construction period will be 30 months excluding the National Grid Substation but appear to have ignored SASES request to reduce working hours from 0800 to 1600. SASES requested in its Written Representations that weekend working should not be allowed on a Saturday (Sunday working is already excluded except for emergencies and with prior approval). The rationale for this request is to reduce the impact created by noise, pollution, dust, road congestion and associated HGV noise as well as reducing NO2 emissions thus reducing build-up of pollutants by reducing the time vehicles and equipment will be operating – SASES appreciates this would extend the contract term which could therefore potentially exceed 30 months.
95. SASES requests the Applicant reconsiders its position concerning working hours due to the proximity to the village. Under normal circumstances for industrial developments of this nature, they would be in a location where local people are not adversely affected. None of the mitigation measures based on SASES observations make a significant difference. The only minor marginal improvement is the reduction in visual impact by reducing ground levels by 2m. As mentioned previously there is no mention of using and adopting best practice acoustic baffles to reduce noise as set out in the Outline Code of Construction Practice.

ID 06 – Summary – Concurrent Construction EA1N and EA2

96. The Applicants explain they are unable to confirm if both projects will proceed concurrently if they are both given approval to proceed. This would potentially mean additional blight and disruption to the local area over an unknown period possibly 7 – 10 years. SASES requests that the Planning Inspectorate mandates, if it sees fit to approve both applications, that both projects **must proceed concurrently** or if not, then at least one project is rejected so that local communities can see a definitive end to disruption, without the entire region being blighted for many years to come.

ID 09 – Summary – Air Quality, Emissions and Dust

97. The Applicant discusses air quality monitoring which is just good practice to remain within legal limits – they are legally obliged to do so. SASES requests **again that air quality modelling is required before the DCO is approved**. Air Quality monitoring after the works commence is too late particularly as it has been pointed out previously by SASES and other groups that emissions are likely to exceed maximum acceptable pollution levels of NO2 and other particulates, taking into account works associated with other energy projects running concurrently with EA1N and EA2.

Construction – onshore cable route 2.13

98. The Applicants have responded only to the Summary Section of the SASES submissions. That is made even clearer by their requests that SASES must provide more information or evidence of statements made. That information and evidence was provided in Sections 4 Paras 44 - 154 and the accompanying Appendices listed in page 20.

99. In IDs 01-03 on page 210, the Applicants still do not commit to a single haul road should Implementations be concurrent
100. In Id 04 on page 211, the Applicants do not explain why these applications are so much more complex than other offshore wind farms DCOs that have cited 4 years that would justify an increased 7 years time for work to commence.
101. In Id 06 on page 211, the Applicants query SASES comments re Survey bias in Stage 2 Community Consultation and requests additional evidence. SASES refers the Applicants and ExA to page 7 Paras 51-55 of SASES Deadline 1 (Cable Corridor Construction) [[REP1-371](#)] for that information.
102. In Id 07 on page 211, re Cable Corridors Site Selection, the Applicants request additional information and evidence from SASES. SASES refers the Applicants and ExA to pages 7-9 Paras 56-72 of SASES Deadline 1 (Cable Corridor Construction) [[REP1-371](#)] for that information. The Applicants refer to **Ch 4 Site Selection and Assessment of Alternatives** [[APP-052](#)]. At 4.9.2 it mentions cable route optioneering and engineering exercises but does not provide evidence that these were carried out and does not provide references to the relevant report(s). We refer also to 4.9.1.3.5 Paras 147-148 (Aldeburgh Road crossing engineering feasibility reports).
103. In Id 08 on page 211, the Applicants states that the impact on residential titles near the Aldeburgh Road crossing has been assessed and is captured in **Ch 5 Noise and Vibration** [[APP-052](#)]. SASES has found no recognition in APP-052 of the extremely close proximity (circa 20 metres distance) of homes in Fitches Lane, Aldeburgh Road or Gipsy Lane. Friston Parish Council asked ScottishPower Renewables to provide a report on this specific matter in Chapter 4 of its **PHASE 4 (Statutory Phase 3) CONSULTATION REPORT AND FORMAL RESPONSE in March 2019**, but no report was forthcoming. A similar request was made by Mr Halford in para 1.3 page 3 of his formal response to Applicant dated 26 March 2019, also to no avail.
104. In Id 09 on page 211, the Applicants state that Cable Orientation and orientation is a matter that can be deferred to some later detail design stage. PINS Advice Note Nine on Rochdale Envelope requires an Applicant "to bring forward the level of detail to enable the proper assessment of the likely environmental effects and necessary mitigation, if necessary considering a range of possibilities". It would appear that the Applicants have not complied with respect to the above at the B1122 cable corridor crossing place, since neither the orientation of the corridor's component parts nor its approximate positioning within the 92 metres wide order limits have been specified. The impact on residences cannot be assessed until the Applicants reveal for example which of cable tranches or haul roads would be closest to their homes or their approximate distance from their homes.
105. In Id 09 on page 211, Id 16 on page 214 and Id 24 on page 217, the Applicants assert that planting post construction of a woodland block at Works no 24 elsewhere would be adequate compensation for the loss of woodland north of Fitches Lane. That cannot compensate for the loss of the present wooded visual aspect along the Aldeburgh Road.
106. In Id 10 on page 212, the Applicants seem have misunderstood the issue raised. SASES queries a decision to deviate from a straight line of Section 2 between cable corridor east of Aldringham House at Works 17 north of Thorpe Road across the R. Hundred SLA valley (Works 18 and 19) to the River Hundred and B1122. The SPA mentioned by the Applicants in their response is further off to the east and not relevant.

107. Re Id 11 on page 212 and Id 16 on page 214, the Applicants commitment to replant trees at Works 24 will not ever compensate for the permanent damage to landscape on the Aldringham Road, Aldeburgh.
108. In Id 22 on page 216, where the Applicants state that adoption of a NPS EN-1 recommendation of B5228 methodology that implies a daytime construction noise threshold of 65 dBA at a receptor is acceptable. SASES understanding is that the BS5228 Standard does not specify a threshold of 65 dBA.
109. In Id 25 on page 217, where the Applicants request further information on which three ProWs that SASES is referring to. SASES refers the Applicants and ExA to Section 4.11: ***PROWs and Hedges*** pages 17-18 para 137 of ***SASES Deadline 1 (Cable Corridor Construction)*** [[REP1-371](#)] where that information is clearly laid out.
110. Re Id 26 on page 218, where the Applicants have not commented with respect to the two hedgerows to Section 4.11: ***PROWs and Hedges on*** page 18 para 139 of ***SASES Deadline 1 (Cable Corridor Construction)*** [[REP1-371](#)] where the two hedges concerned have been clearly specified.
111. Re: Id 28 on page 219, where the Applicants request further information on the concerns about ambiguity and confusion in the Applicants' documentation on Construction Traffic routing. SASES refers the Applicants and ExA to Section 4.12: Traffic and Transport pages 18-19 of SASES Deadline 1 (Cable Corridor Construction) [[REP1-371](#)].

APPENDIX 1

**Flood Risk Related Comments on Deadline 3 Submissions prepared by GWP
Consultants dated January 2021**

APPENDIX 2

Letter From National Grid to Suffolk County Council dated 28 October 2019