

## **Deadline 5 submissions**

Dear Mr Smith and Colleagues,

Thank you very much for visiting High House Farm during the Accompanied Site Visits and for taking the time to look carefully at the house, the garden and the views from the house towards the substation site. I hope by seeing the site from our garden you will have been better able to appreciate its close proximity and the devastating impact this development will have should it be allowed to go ahead.

Following the visit, I would like to respond to various assertions made by SPR in its submissions in relation to High House Farm. I would then like to identify various other matters of a broader significance.

Generally, I adopt and endorse the submissions of SASES and SEAS

### **(1) Heritage value**

1. SPR have significantly underestimated the magnitude of impact on the heritage value of High House Farm. SPR claims that the magnitude of the impact on the overall heritage significance is limited. They have assessed it as Low adverse/Minor in the event of one or both projects going ahead. Their reasoning is as follows:
  - The significance of the post-medieval vernacular building relates primarily to its historic fabric, which would be unaffected.
  - The ability to appreciate the relationship between High House Farm and the other historic settlements on the edge of Friston Moor would be unaffected.
  - Screening by vegetation and surrounding buildings and the absence of close range views means that the historic character of the Listed Building cannot be readily appreciated from its setting, diminishing the value of the views affected by the proposed East Anglia TWO and East Anglia ONE North projects.
  - The impact is considered to result in an effect of minor significance in EIA terms.
2. SPR's attempt to downplay the heritage impact is for the obvious reason that it knows that consenting the application would create real and irreparable heritage damage.
3. You will have seen yourself when you visited that, in fact, the High House Farm site is clearly visible from footpaths, roads and other properties surrounding Fristonmoor. From the garden you can see the church clearly. The trees we have are deciduous and for large parts of the year the site is very much open to the surrounding countryside as

it was when you visited. Even when the trees are in leaf we have good views to the church from all stories of the house.

4. Dr [REDACTED], in his expert heritage report for SASES, concluded that SPR significantly underestimated the heritage value and impact of the substations on High House Farm. His assessment was that the impact was Medium/Moderate. SPR's assessments continue to completely ignore the fact that the cable sealing end compounds will be located only 200m away from and directly in front of the house blocking the view to the church.
5. Dr [REDACTED] states in his report:

“5.8.2 High House Farm shares historical connections with the group of related farmsteads on the edge of Friston Moor, which also includes Little Moor Farm, as well as with the church to the south, and these connections add to the historical and archaeological interest of the property.

5.8.3 High House Farm is a relatively open site and the complex of buildings of which the listed farmhouse forms a part is highly visible from numerous locations in the surrounding landscape, with particularly long views from the south and south-east, across the proposed development site towards the church (Figure 6). These views will be blocked as a result of the proposed development and the historical connection between the farmsteads and the church and settlement to the south will be severed.

5.8.4 The proposed schemes will see the construction of new pylons on land immediately to the south of High House Farm, together with three cable sealing end compounds, with the National Grid substation located 350m to the south of the building. Beyond this, the substations will be constructed. Also significant is the fact that the construction area boundary line follows the southern property boundary of High House Farm. As is the case for Little Moor Farm, this will bring construction activity into the immediate proximity of the listed building, which will consequently be exposed to the physical and visual impacts of construction for a period of several years. Neither the impacts which will be caused to the setting of the listed building during the construction or decommissioning phases of the project have been assessed.”

6. Dr [REDACTED] photograph below makes the point that, *at present*, we have a view of the Church and village. We will lose this.
7. The viewpoints relied on by SPR seem to have been deliberately chosen to give a misleading impression of the impact of the development.
8. High House Farm is featured in photomontage taken from viewpoint CH VP3. This viewpoint is on a public right of way 100m to the north of High House Farm and about

a third of the way along the path. As you will have seen as you walked towards the house the viewpoint seems to have been chosen because it creates the false impression that the views from the house would, in any event, be masked by existing structures and growths. As Dr [REDACTED] pointed out:

“... as such [it] does not actually provide a visual indication of any potential impact which may be had on High House Farm itself. It does, however, indicate that even at a distance of 400m, all three combinations of the proposed substations and associated infrastructure are starkly visible against the skyline and will form a significant backdrop to the listed building.”



*Figure 6. A long view looking southwards from the garden of High House Farm across the proposed development area. Note that the church tower and nave are clearly visible from a distance of 1.2km.*

6. A similar criticism must be made of photomontage LVIA VP5 (Chapter 29 of the Environmental Statement – *Landscape and Visual Impact Assessment*). This is taken from about 50m to the west of High House Farm and, equally, fails to convey a fair and accurate picture of the appearance of the substation site. Once again Dr [REDACTED] says:

“The impression given by this image is misleading, because the unhindered viewpoint presented in image 'a' of the sequence is not the same as the base image used for the later views in the series.”

7. The LVIA VP5 images showing the mitigation are misleading.
  
8. The recently published OLMP shows the mitigation proposed by SPR . It consists of a thin section of “potential early edge woodland planting” on our boundary and a thin margin of additional edge woodland planting around the cable sealing end compounds. Because of the proximity to overhead lines the height of the canopy will need to be limited. The LVIA VP5 montages show the proposed mitigation at 1 year into operation and 15 years. Even with the optimistic growth predictions and questionable choice of plants and trees the Cable sealing compounds and compounds are still highly visible and will be from all stories of our home.
  
9. There is **no** mitigation which can negate the impact of the development on our property. As Dr Hoggett states “I place this harm towards the upper end of the scale.” (paragraph 5.8.10). He also concluded:

“In my professional opinion, the applicant’s assessments significantly underestimate the heritage impact of the proposed EA1N and EA2 schemes and undervalue the contribution made by setting to each of these designated heritage assets, resulting in much lower assessments of the adverse heritage impact on each of these individual listed buildings than might otherwise be concluded. In particular, the submitted illustrative viewpoints selected and photomontage visualisations are highly selective and do not include key views, such as that from the tower of Friston church, which would enable a better visual impression of the likely impact of the scheme to be presented.”

9. SPR have recently submitted documents providing an updated heritage impact assessment following a small reduction in the proposed height and footprint of the SPR substations. Their assessment is unaltered as is Dr [REDACTED]’. In making their reassessment mention is made of the NGET substation said to be 450 m to the south east of High House Farm (it is in fact much closer) but incredibly fails to mention, and therefore take into account, the cable sealing end compounds which are located much closer to the house.
  
10. Historic England also make important points about heritage. The following citations (deadline 4 submission) highlight the issues:
  - Despite changes despite the changes: “... views of the church from the north will still however be obliterated as illustrated (CHVP 4) and in spite of the changes the loss of the footpath will continue to lead to a change to the relationship between the church and this land to the north.”
  - In relation to mitigation “We remain sceptical about the growth rates and consider the efficacy of the planting is optimistic”.
  - “We also continue to raise concerns about the location of the two westernmost seeing and compounds which still appear to crash into the

landscape rather than be placed with care so as to avoid impacts upon historic field boundaries and features”.

- “We note for example that there is no classic clarification with regards to the NGET substation and additional information is sought”.
- “We had previously concluded that the development of the substations both individually and in conjunction with each other and with the NGET substation would result in harm to the historic environment.

## **(2) AIS / GIS NGET substation**

11. The impact of the development will be affected by whether the NGET substation and infrastructure will be AIS or GIS . This decision makes a huge difference in terms of impact specifically because of the variation in height and footprint of the two types of substation.
12. It is remarkable that at this late stage of the examination no decision has been made on this. All the photomontages show an AIS substation for the NGET facilities. This is substantially lower in height and impact. None show the impact if a GIS station is selected. SPR has taken the best-case scenario.
13. I would refer you to the evidence of ██████████ SASES’s expert which describes the differences between the two technologies:

“NG Substation (Figure 5). This would either be an Air Insulated Switchgear (AIS) or GIS substation. The differences are summarised below:

- o AIS substation - Maximum footprint 4.49ha, maximum height of buildings 6m.

- o GIS substation - Maximum footprint 1.68ha maximum height of buildings 16m.

- o Maximum height of electrical equipment would be 16m for both.

NG Cable Sealing End Compounds (Figure 5). Up to three cable sealing end compounds, two of which would be up to 0.25ha and the third would be 0.5ha (cable sealing end (with circuit breaker) compound). These compounds contain electrical infrastructure that enables the NG substation to connect with the overhead lines. Their location would be determined during detailed design. The tallest structures in the compounds (the overhead line gantries) are 16m in height. The larger compound would also contain a 3.5m tall building with a 3m x 5m footprint.

National Grid Overhead Realignment Works (Figure 9). To include:

- o Realignment of the existing northern overhead line further north in order to create separation between the two overhead lines for the construction of cable sealing end compounds. This would include replacing up to two existing pylons and adding one new pylon.

- o Replacement of one existing pylon within the southern overhead line”.

14. At the recent ISH relating to the draft DCO some mention was made of more detail being given to the design of the cable sealing ends which will be most proximate to High House Farm. But none has yet been given. We do know that NGET is seeking to expand the facilities for further connections. There is no assessment anywhere of this proposed expansion and its impact.
15. SPR claim that any extension to the NGET installations will need separate DCO. Yet a substantial amount of land is sought well beyond that which is necessary for the current plans. This seems to be an exercise in acquiring land for these alleged future applications and a yet further example of the lack of transparency on the part of SPR which characterises this application.

### (3) Other points

16. **Noise -lack of cumulative assessment in application relating to NG infrastructure:**  
[REDACTED] expert report for SASES makes clear that SPR has significantly underestimated the noise impact of the substations both during construction and during operation. In addition, SPR has not carried out any assessment of any noise that may be made by the NGET installations. SPRs case is based upon assertion only, which is not evidence.

Mr [REDACTED] states

“7.14 No cumulative assessment is provided that includes the adjacent National Grid Substation on the grounds that (ES Chapter 25 25.3.2.1 page 8) “29. The National Grid infrastructure does not contain plant such as high voltage transformers or shunt reactors, or rotating plant such as transformer coolers, that would usually be the dominant noise sources from a substation during operation. 30. Any noise during the operational phase from National Grid infrastructure would be due to switchgear (circuit breakers & isolators), and if present, auxiliary plant such as control systems or an emergency generator.

7.15 However, the subsequent paragraph draws attention to “noise from switchgear which is impulsive in character” but makes no numerical assessment of it on the grounds that “these items of plant are designed to be inherently quiet in operation, and do not make operational noise or vibration at a level that would be perceptible at NSRs.” Impulsivity attracts an additional penalty of from +3 to +9 dBA in BS4142 depending on its perceptibility”

17. **Light:** At present we enjoy the big skies that Suffolk is famous for from the house and garden. On a clear night the stars are incredible and when the moon illuminates the garden it is magical. This will be lost when SPR light the site. There has been no ISH in relation to light. This is a material issue upon which all residents wish to be properly heard. I invite the Authority to convene hearings to ensure that our serious concerns are heard on this issue.

18. **Loss of ancient footpaths:** In previous submissions we have spoken of the impact of the loss of the ancient footpaths and the lost connection to the village.

19. **SPRs changing case:** SPR's belated and plainly tactical change of position to bring forward the commencement of the project is nakedly tactical and belies good faith. It shows that SPR believes that the contention that this application should be brought within the national integrated strategy has real force. This is forensic "legerdemain". It is mere assertion.

In conclusion, if this development is consented the impact in purely human terms, for myself and my family, will be simply horrific. The legacy will endure for the rest of our lives. What is so profoundly depressing in all of this is the manner in which SPR deliberately pretend that none of this matters. It does. And it is avoidable.

Yours faithfully

Fiona Cramb

A black rectangular redaction box covering the signature area.