



SPR EA1N and EA2 PROJECTS

DEADLINE 6 - RESPONSES TO APPLICANTS D5 COMMENTS ON SASES D4 SUBMISSIONS

Interested Party: SASES PINS Refs: 20024106 & 20024110

Date: 3 February 2021

Issue: 1

Introduction

1. The following responses are made on the Applicants' Comments on SASES' D4 submissions [REP5-017](#) to which SASES has only responded by exception.
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 and its subsequent submissions.

ID	Topic/Document	SASES Comments
2.2 Traffic and Transport		
Outline Construction Traffic Management Plan (OCTMP)		
6		SASES notes that the Applicant envisages the use of Access 13 by large vehicles after construction of the NG substation. This is inconsistent with its use for maintenance purposes and the limitations of the local road network
17,18 &19		The Applicant's response still fails to provide an indication of the likely magnitude or duration of Off-site Highway Works in the local road network
21		It is noted that the Applicant does not refute SASES assertion that impact of 400 HGV movements (pk) plus non HGV site traffic is far from insignificant to the local population.
Outline Travel Plan		

24		SASES continues to hold the view that notwithstanding the appointment of a Traffic Plan Coordinator, it is the Applicant that remains responsible for ensuring for the vehicular activities of all contractors and sub-contractors engaged in site construction.
25		It is noted by SASES that is the Applicant and not any other body (eg Suffolk County Council as Highways Authority of the Department of Transport) is defining significance terminology.
28 & 30		It is noted that the Applicant is providing an undertaking that average car share ratio will be not less than 1.5.
37		<p>The Applicant's response to SASES concerns regarding use of "Pre-Construction Access" is set out below:</p> <p><i>The Applicants have not used the term 'Pre-Construction Road', As set out in paragraph 334 of Chapter 4 – Project Description of the ES (APP-052) 'Accesses for all onshore preparation works are identified in Figure 6.6 (a-j) (APP-101) as 'Onshore Preparation Works Access'. No new physical works will be required at these access locations, and any onshore preparation works traffic will use the existing condition of the accesses and ensure that accesses are reinstated to pre-use condition.</i></p> <p><i>The Applicants are not seeking rights under the DCOs to use any Pre-Construction Access for construction activities.</i></p> <p><i>Onshore preparation work activities may include the following:</i></p> <ul style="list-style-type: none"> • <i>Site clearance;</i> • <i>demolition work;</i> • <i>pre-planting of landscaping works;</i> • <i>archaeological investigations;</i> • <i>environmental surveys;</i> • <i>ecological mitigation;</i> • <i>investigations for the purpose of assessing ground conditions;</i> • <i>remedial work in respect of any contamination or other adverse ground conditions;</i> • <i>diversion and laying of services;</i> • <i>erection of temporary means of enclosure;</i> • <i>creation of site accesses;</i> • <i>footpath creation;</i>

		<ul style="list-style-type: none"> • <i>erection of welfare facilities; and</i> • <i>the temporary display of site notices or advertisements.</i> <p><i>Typically, the majority of these activities will be able to be undertaken using light commercial vehicles (such as a panel/transit van).</i></p> <p>The above activities will, by implication, require vehicular access and movement from the public highway. In the case of the Pre Construction Access starting at map reference TM 41496 60512 (Grove Road), Works plans show this access to join up with the haul road and the Construction/Consolidation Compound to close to Knodishall. SASES is not seeking clarification of works needed to refine the entrance, but some form of recognition by the Applicant that this is a much used footpath and bridleway and could be used as an entrance to the entire construction site, to the detriment of local residents. The Applicant should have provided a firm commitment that use of "Pre-construction Access routes by vehicles will be limited and rigorously policed. The Applicants Deadline 4 response contains no such assurance.</p> <p>Similar concerns remain for preconstruction accesses at the following map references:</p> <p>TM 44640 60816, TM 44640 60720, TM 45848 62480, TM 46480 60272, & TM 47000 60000</p>
Access Management Plan		
39 &40		It is noted that the Applicant confirms that access to the onshore substation (substations) will be via Access 13 and that vehicle movements would be limited to occasional repair, maintenance, and inspection. The Applicant fails to provide an estimate of the likely number of movements per month (say). This is also inconsistent with ID 6.
41		The Applicant again fails to provide an explicit statement on whether the crossing (11/12) will be manned. It is therefore presumed that the crossing will not be manned. Local knowledge suggests this is an unwise situation given the likely daily HGV movements during initial stages of substation construction. Absence of this point from a Project Risk Register would reflect badly on the Applicant
57,58 & 59		It is suggested that the Applicant revisits these proposed works to ensure there is no risk to passing motorists or pedestrians as a consequence of the very limited clearance between working machinery and vulnerable passers-by.
2.3 Onshore ecology		

1		The Applicants have acknowledged that they have overstated the need for removal of hedgerows on the substation site. Further detail should be provided so that more of the existing hedgerows can be retained for the benefit of bats and birds etc which are prolific in this area. The Applicant should not seek total removal for its own convenience.
3		The Applicants refer to an assessment of operational noise in D4 Onshore Ecology Clarification Note (REP4-005). This concludes that the substation site is of <i>“low ecological value and as a consequence, disturbance from lighting and noise is predicted to be minor adverse and therefore not significant and only have the potential to affect ecological receptors in the immediate vicinity of the substations”</i> . The Applicants have not acknowledged that the wooded pit, which will be directly adjacent to the western substation, is a haven for wildlife in particular for bats, badgers, birds and deer. Similarly Laurel Covert provides very suitable habitat for wildlife and will be adjacent to the eastern substation. This wildlife will initially be displaced by the construction activity and be very unlikely to return due to light and noise in operation.
2.4 Public Rights of Way		
1 & 2		<p>The Outline Public Rights of Way Strategy (REP3-024) does not explain how the PRoW network around the substation site will remain open and usable during the construction period. Specifically it does not explain how or when the new footpath adjacent to/on Grove Road will be created nor how pedestrian use interacts with the haul road. It is to be noted that the haul road will remain in place throughout the construction period and be subject to frequent use by HGVs accessing the substation site.</p> <p>The Applicant has not answered SASES’ question as to how the PRoW network will remain in use around the substations site during the construction phase.</p>
3		The Applicants have rejected SASES’ proposal that a dedicated website should be available for information on footpath closures and diversions during the construction period. This is a very simple and efficient way of getting information to the public and its creation should not be resisted. The consultation process shows that the use of local newspapers is not reliable and placing yet another burden upon the District Council and Parish Councils is not acceptable.

		The Applicants commented on SASES' proposal that the notification period should be extended to one month and the Applicant is asked to respond.
4		The Applicants acknowledge that permanent diversion of the PRoW on the substations site takes users along a short section of Grove Road. Grove Road is not safe for pedestrians and the diversion of this footpath in this manner will further erode amenity.
5		It remains unclear why the diversion of PRoW E-260/017/0 is necessary. The existing course of the footpath has remained unchanged during the lifetime of the oldest village residents, who see no advantage to users of the network in it being diverted to a historic field boundary.
2.6 Design		
1&2		<p>The Hornsea One 1200MW substation footprint (3.22 ha) referred to was that area <u>specified in the DCO Requirements</u> (https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010033/EN010033-002062-Hornsea%20Project%20One%20Offshore%20Wind%20Farm%20Order%202014%20as%20made.pdf page 33 ref. 23) for that project.</p> <p>If the design had been "fully optimised" to achieve the 3.22ha footprint, as SPR assert, then clearly that design work must have been done <u>prior</u> to DCO approval. This raises the issue as to whether the Applicant should not by now have carried out more detailed work on their own proposals to ensure no more land take than is essential. SASES is very concerned that SPR's design approach appears to be overly based on 'conceptual system design studies' and 'early information from supply chain'. This approach could lead to significant inefficiency in land usage (contrary to EN-1).</p>
1&2		The Applicant are recommended to discuss their concerns regarding the 2.1ha reference footprint for an 800MW HVAC substation, documented by NGEN in their Integration Review, directly with NGEN.
1&2		SASES notes that the Hornsea One project does incorporate an offshore reactive compensation platform but refers the Applicant to paras 3.3.140 and 3.3.141 on page 3-55 of the Hornsea One Project Description

		<p>https://webarchive.nationalarchives.gov.uk/20190604213422/https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010033/EN010033-000511-7.1.3%20Project%20Description.pdf where it is stated (SASES emphasis):</p> <p><i>“3.3.140 If the HVAC Export Option is used, an onshore HVAC substation will be required to allow Project One to be connected to the National Grid. The onshore HVAC substation will allow transformation of the voltage to the required transmission system level and will provide reactive power compensation and filtering equipment to ensure that the wind farm complies with the technical requirements to connect to the National Grid.</i></p> <p><i>3.3.141 This equipment is likely to include three main onshore transformers, 400kV and export cable transmission switchgear, up to two sets of harmonic filtering equipment, up to four sets of static reactor shunts, up to three dynamic compensation devices, other lightning and transient protection equipment and other auxiliary equipment. An indicative example of what an HVAC onshore substation could look like is shown in Figure 3.29, but the final size and the amount of those components will be decided during the detailed design phase of the project.”</i></p> <p>This additional information implies that the Hornsea One substation design incorporates further reactive compensation equipment and is therefore not an unreasonable comparator with the EA1N design, and processes 1200MW of power within a 3.22ha footprint, rather than the proposed 800MW of power within 3.23ha proposed by the Applicant.</p>
1&2		<p>In his statement at ISH2 Session 4 on 2nd December 2020 [EV-034o] (at 28min approx.) Mr Green, speaking on behalf of the Applicant, stated in response to questioning about the use of 275kV as the system voltage <i>“it means we can get more power through the cable corridor and have a much reduced footprint per megawatt at the onshore substation”</i> (SASES emphasis).</p> <p>Clearly this statement suggests a smaller substation footprint for SPR’s proposed substations by use of a 275kV system voltage than if 220kV had been used. SPR are asked to explain how <i>“much reduced”</i> has translated into actual footprint saving, bearing in mind the views of NGESO with regard to the footprint of an 800MW substation.</p>
2.8 Flood Risk		
		<p>Other than the Applicants repeating their previous responses with respect to the forthcoming updated OODMP and CoCP, and the development site not being responsible for the 2019-2020 flooding events in Friston, the Applicants’ comments place a new focus on the release of storm run-off waters at the QBAR flow rate (1 in 2.3</p>

		<p>Year Return Period) as a means to address the TOTAL volume issues raised by SASES, an approach which is recommended in the SCC SUDS Local Design Guidance.</p> <p>Whilst the Applicants committing to not releasing overland flows from the attenuation ponds at higher than the QBAR flow rate is an improvement on the previous peak flow rates proposed by the Applicants, the Applicants have still not demonstrated that adequate storage can be provided on site to enable these low flow rates to be achieved during the operational phase.</p> <p>The Applicants have:</p> <ul style="list-style-type: none">• no knowledge of the possible infiltration rates that can be achieved to reduce the required overland flow rates;• has failed to determine that the QBAR flow rate will be adequate to prevent flooding in Friston village;• has demonstrated their current design provides insufficient storage for the 1 in 100 Year +20% storm event and will be overtopped for the 1 in 100 Year +40% storm event;• has not demonstrated that emptying times are sufficiently rapid between storm events;• has provided a design with retained water body depths greater than those permissible under the SCC SUDS Local Design Guide; <p>and therefore has neither proved a design is viable that can restrict overland flows to QBAR nor that such a flow release will mitigate the flood risk to all residents of Friston Village.</p>
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