



**SCOTTISHPOWER  
RENEWABLES**

# **East Anglia ONE North and East Anglia TWO Offshore Windfarms**

## **Applicants' Comments on Fiona Cramb's Deadline 9 Submission**

Applicant: East Anglia TWO and East Anglia ONE North Limited  
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Author: Royal HaskoningDHV

**Applicable to East Anglia ONE North and East Anglia TWO**



#### Revision Summary

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#### Description of Revisions

Rev	Page	Section	Description
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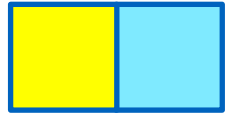
## Glossary of Acronyms

CIA	Cumulative Impact Assessment
DCO	Development Consent Order
ES	Environmental Statement
ESC	East Suffolk Council
ETG	Expert Topic Group
OLEMS	Outline Landscape and Ecological Management Strategy
SASES	Substation Action Save East Suffolk
SCC	Suffolk County Council
SoCG	Statement of Common Ground
WSI	Written Scheme of Investigation



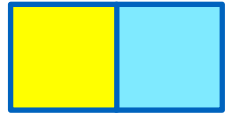
## Glossary of Terminology

Applicant	East Anglia TWO Limited / East Anglia ONE North Limited
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.
Onshore development area	The area in which the landfall, onshore cable corridor, onshore substation, landscaping and ecological mitigation areas, temporary construction facilities (such as access roads and construction consolidation sites), and the National Grid Infrastructure will be located.
Onshore substation	The East Anglia TWO / East Anglia ONE North substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.
Onshore substation location	The proposed location of the onshore substation for the proposed East Anglia TWO / East Anglia ONE North project.



# 1 Introduction

1. This document presents the Applicants' comments on Fiona Cramb's Deadline 9 submission (REP9-112).
2. This document is applicable to both the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23<sup>rd</sup> December 2019 (PD-004). Whilst this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it for the other project submission.



## 2 Applicants' Comments

3. **Table 1** presents the Applicants' comments on Fiona Cramb's **Comments on Applicant's response to Deadline 7 Submission and Comments on submissions received by Deadline 8** (REP9-112).



**Table 1 Applicants' Comments on Fiona Cramb's Deadline 9 Submissions (REP9-112)**

ID	Fiona Cramb's Comment	Applicants' Comments
<b>Introduction</b>		
1	In its submission SPR simply repeat its predetermined position that the impact on High House Farm is negligible.	<p>The Applicants' assessment of impacts on High House Farm does not reach a finding of 'negligible' under any assessment scenario, either with or without landscape mitigation. As stated in the <b>Heritage Assessment Addendum</b> (REP4-006), in all scenarios the Projects are considered to have an adverse impact of low magnitude on the significance of High House Farm. This is judged to be an impact of <b>minor significance</b>.</p> <p>The Applicants would reiterate that this assessment relates to the heritage value of High House Farm. Other technical assessments within the Environmental Statement (ES) (e.g. <b>Chapter 25 Noise and Vibration</b> (APP-073) and <b>Chapter 29 Landscape and Visual Impact Assessment</b> (APP-077)) consider this location in terms of other potential impacts.</p>
2	SPRs assessment is wholly unreal. This vast proposed site will share a boundary with the garden of High House Farm and that boundary is about 20 metres from the house itself. The construction site and the development will sever High House Farm from Friston Village.	<p>The Applicants agree that the <b>Outline Landscape and Ecological Management Strategy</b> (OLEMS) (document reference 8.7) includes planting proposals adjacent to the southern boundary of the grounds of High House Farm, but the closest substation-related infrastructure (the western sealing end compound) would be 230m from that boundary.</p> <p>The Applicants have provided detailed assessments of the predicted impact of the proposals on High House Farm in <b>Appendix 24.7</b> of the ES (APP-519/520), with re-assessment of the revised proposals in the <b>Heritage Assessment Addendum</b> (REP4-006). These assessments follow relevant Historic England guidance and are based on a systematic analysis of the ways in which the setting of this Listed Building contribute to its significance.</p>
3	The impact of the construction will, without a question, be devastating. Setting to one side SPRs dissembling over cumulative	The Applicants note Ms Cramb's disagreement regarding the visibility of the church from High House Farm; however, it remains the Applicants' position that





ID	Fiona Cramb's Comment	Applicants' Comments
	<p>impact, the duration of successive rounds of construction could run into decades. And once constructed this ever increasing hub will destroy Friston the village, and the connection of High House Farm to it forever. In relation to the view from the southern edge of the garden the applicants persist in their unsubstantiated assertion that the construction of the proposed substations and sealing end compounds would not obstruct view of the church. SPR says that it is the proposed screening that would obstruct a view of the church. This is absurd as anyone who had stood in the garden at the relevant points would know. It is the development that will obscure the view, not the mitigation.</p>	<p>a view of the church would be obstructed by mitigation planting rather than by the Projects' electrical infrastructure itself, as presented within the <b>OLEMS</b> (document reference 8.7). The church tower would be seen between the western sealing end compound and the main group of substation structures. but proposed planting to the south-west of the substations would create a screen of trees.</p>
<b>Heritage Assessment</b>		
4	<p>The approach adopted by SPR is simply to repeat self-serving and predetermined assertions and refuse to engage with the ever-growing body of evidence.</p>	<p>The Applicants have engaged with a number of parties on cultural heritage matters throughout the development of the Projects and the application process. This has included multiple meetings of a cultural heritage Expert Topic Group (ETG) (including Historic England, East Suffolk Council (ESC) and Suffolk County Council (SCC) (the Councils)), the development of Statements of Common Ground (SoCG) with the relevant technical stakeholders and others, the exchange of Written Representations and participation in Issue Specific Hearings. This process has led to agreement on appropriate methodologies and the scope of assessments and refinements to the design of the Projects that have reduced or avoided some predicted adverse impacts.</p> <p>It is common ground that the Projects as they are now designed would still have an adverse impact on a limited number of heritage assets as a result of the predicted change in their settings. The Applicants would note that while they and Historic England agree that harm to the setting of St Marys Church will be in the less than substantial category, there is a difference of professional opinion regarding the level of harm within the category. The Issue Specific Hearings and</p>



ID	Fiona Cramb's Comment	Applicants' Comments
		<p>Written Representations have, quite rightly, been focussed on the limited areas of disagreement that remain.</p> <p>The heritage assessments submitted by the Applicants have been prepared by suitably qualified competent independent experts. The conclusions reached in these assessments are the professional judgements of those experts. Any disagreement with other experts reflects differences of professional judgement between individuals working within a common methodological framework and is a common occurrence in impact assessment.</p>
5	<p>It persists with its assessment that the impact of the developments on the Heritage importance of High House Farm would be in terms of the magnitude of impact be low adverse and in the significance of effect be minor.</p>	<p>The Applicants note this is the correct conclusion of the cultural heritage assessments as set out at ID1.</p>
6	<p>No one else agrees with SPR.</p>	<p>The Applicants accept that assessments undertaken on behalf of ESC and Substation Action Save East Suffolk (SASES) have reached different conclusions regarding the magnitude and significance of impact on the significance of High House Farm. These result from differences in professional judgement. The Applicants stand by their impact assessment.</p>
7	<p>[REDACTED] in his report for SASES assesses the magnitude of impact on the heritage value of High House Farm as medium and the significance of effect as moderate. He considers that SPR has deliberately underestimated the heritage value of the seven heritage assets effected by the proposed development both individually and collectively:</p> <p><i>“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</i></p>	<p>The Applicants have already responded to these statements in <b><i>Applicants' Comments on SASES' Deadline 1 Submissions</i></b> (REP3-072). The Applicants are not aware of the SASES assessment suggesting that they have deliberately underestimated the value of heritage assets, which is a serious accusation. The issue is more likely a difference of professional judgement between the experts in question.</p>



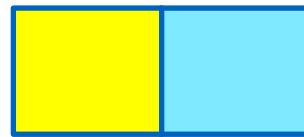
ID	Fiona Cramb's Comment	Applicants' Comments
	<p><i>south-east, across the proposed development site towards the church (Figure 6). These views will be blocked as a result of the proposed development and the historical connection between the farmsteads and the church and settlement to the south will be severed."</i></p> <p><i>"Although each of the heritage assets is assessed singly, it should be stressed that these heritage assets do not exist in isolation and are all parts of a significant area of historic landscape which lies to the north of the village of Friston.</i></p>	
8	<p>He identifies the numerous failings on the part of SPR to conduct proper assessments. He describes the assessments that have been carried out as beset with "significant shortcomings" and "incomplete." He criticises the claim made by SPR that it would conduct these assessments post consent. This is a "major shortcoming"</p>	<p>The Applicants have already responded to the SASES assessment in <b>Applicants' Comments on SASES' Deadline 1 Submissions</b> (REP3-072).</p> <p>The Applicants would note that the quotes selected by Ms Cramb relate to archaeology (and not the setting of heritage assets). The Applicants would also note that the work being referred to has in fact been agreed with the Councils (see LA-06.15 of the SoCG with the Councils (REP8-114) which states that "<i>The Applicants have reviewed the Councils comments on the <b>Outline Written Scheme of Investigation</b> (WSI) (REP6-005) and have incorporated changes. The Councils are happy with the <b>Outline WSI</b> submitted at Deadline 6 (REP6-005). The Applicants have committed to further preconstruction archaeological surveys (trial trenching) which are anticipated to commence in 2021. The Applicants believe the commitment to 5% sampling of the onshore development area plus ongoing consultation with the Councils regarding appropriate subsequent mitigation will address the Councils' concerns that insufficient intrusive survey data will be collected"</i>).</p>
9	<p>[REDACTED] also points out in his Executive Summary that SPRs analysis ignores completely the construction phase describing it as a "significant omission":</p>	<p>The Applicants have already responded to the SASES assessment in <b>Applicants' Comments on SASES' Deadline 1 Submissions</b> (REP3-072), including points relating to construction phase impacts.</p>



ID	Fiona Cramb's Comment	Applicants' Comments
	<p><i>"The exclusion of the of the construction phase from the heritage impact assessment is particularly concerning, for in many cases the boundaries of the construction area lie in very close proximity to heritage assets, where they will arguably have a much greater impact than some of the later, operational phases of the proposed scheme."</i></p>	<p>The 'scoping out' of construction works was discussed and agreed with the ETG and with Historic England through the SoCG process. The Applicants note that this statement has been agreed with the Councils (see LA-07.07 of REP8-114). The Councils have also agreed the following statement at LA-07.05 (REP8-114): <i>"The approach to scoping out construction phase impacts upon the setting of heritage assets from further, more detailed assessment is appropriate"</i>.</p> <p>Construction works that would result in material permanent change in the setting of heritage assets have been considered in the assessment of operational impacts (see ID26 of <b>Applicants' Comments on SASES' Deadline 1 Submissions</b> (REP3-072) for further detail).</p>
10	<p>[REDACTED] then says that SPR's assertions:</p> <p><i>"... 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."</i></p>	<p>The Applicants have already responded to the SASES assessment in <b>Applicants' Comments on SASES' Deadline 1 Submissions</b> (REP3-072).</p>
11	<p>[REDACTED] says that the harmful effects on local heritage assets must be weighed in the overall balance:</p> <p><i>"Under existing planning law and policy it is required that these adverse impacts be weighed against the wider benefits of the application and that the greater the negative impact on the</i></p>	<p>The Applicants have already responded to the SASES assessment in <b>Applicants' Comments on SASES' Deadline 1 Submissions</b> (REP3-072).</p>



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	<p><i>significance of the designated heritage asset, the greater the benefits that will be needed to justify approval. Any decision taken will also require that the desirability of preserving the settings of listed buildings should be given 'considerable importance and weight' when the decision-maker carries out the balancing exercise (Barnwell Manor Wind Energy Ltd v East Northants DC, English Heritage, National Trust and SSCLG [2014] EWCA Civ 137, Para. 24)."</i></p>	
12	<p>In its response at Deadline 8 SPR in relation to the view to Friston church from the garden of High House Farm which the Inspectors described as: <i>"At the ExA site visit it was clear that the garden of HHF provided clear views across a largely open landscape to the church of St Mary Friston"</i>, SPR say that:</p> <p><i>"... the Applicants do not consider that the view of the church from the garden makes a substantive contribution to the significance of High House Farm and therefore the severance of the view would not materially affect the significance of this Listed Building.</i></p>	<p>The Applicants maintain their position, which has been informed by an independent expert on cultural heritage settings assessments.</p>
13	<p>East Suffolk Council also disagrees with SPR's analysis. In its Deadline 5 Submission it says of High House Farm.: <i>"We remain of the view that the magnitude of adverse impact would be medium, giving rise to an effect of moderate significance"</i></p>	<p>Noted. The Applicants would note that this is a difference of professional opinion.</p>
14	<p>Historical England also disagrees. It continues to object to the on shore elements of the projects upon the basis that the developments would harm the historic environment:</p> <p>At Deadline 5:</p>	<p>The Applicants would note that Historic England's position on several elements of the Projects has changed since Deadlines 5 and 6. The Applicants would point to the SoCG (REP8-127), which has been signed by Applicants and Historic England, and to the <b>Deadline 9 Topic Position Statements</b> (REP9-</p>



## Applicants' Comments on Fiona Cramb's Deadline 9 Submissions

6<sup>th</sup> May 2021

ID	Fiona Cramb's Comment	Applicants' Comments
	<p><i>"Historic England conclusion and Position As set out in our previous letter we conclude that the development of the sub-stations both individually and in conjunction with each other and with the NGET sub-station would result in harm to the historic environment. This is harm to the significance of a number of designated heritage assets from development within their setting. Our primary concern is still the grade II* listed church of St Mary's, Friston, and because of the important relationship of the development area to the church and the erosion of its rural setting. We have concluded and continue to be of the view that this would be a high degree of less than substantial harm. Although we welcome the changes Historic England do not consider this is sufficient to alter our overall position and we maintain our in principle objection to the sub-station elements of both developments and the NGET infrastructure. This would be a high degree of less than substantial harm."</i></p> <p>At Deadline 6:</p> <p><i>"The changes made in this OLEMs plan, retention of existing woodland and changes to the screen the development from the north in particular are welcomed, however these are relatively small changes to the overall scheme and do not affect our overall fundamental objection. This is particularly apparent in those key views of the Church from Moor Farm, where the development would cut across the footpath which runs from Friston to Moor Farm to the north of the church. The use of planting to here to screen the development would have the effect of screening out the substation in the immediate foreground but, because it would continue to</i></p>	<p>009) which provide a more current overview of the status of each of the various technical assessments undertaken by the Applicants.</p>



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	<p><i>block and restrict the key views of the church and remove those views its remains harmful. Both the scheme and the mitigation are harmful, and because one seeks to soften or reduce the dominance of the other does not necessarily reduce the overall effect of harm. Again because it is natural it is not necessarily appropriate in relation to the setting of an historic asset. Retention of existing planting is likely to increase the screening again in some areas however the overall reduction of impacts is relative modest overall, and would in our view be negligible in relation to reducing the overall effects of the scheme on the significance of the church. Again we feel it is also worth stating that we maintain a concerns as to whether the planting would be effective in its job of mitigating the impact of the development on the significance of the church, this is due to the concerns raised by council and other in relation to growth rates. It the OLEMS proposal is not effective, and would not end up screening the development then the overall harm would be exacerbated for longer and would be more damaging. We are aware the developer have sought measures to increase the success of the planting, and we are aware this is not our area of expertise, however the failure of the scheme or the failure to achieve the projected growth rates would result in an increased level of harm to the historic environment."</i></p>	
15	<p>Finally, a point of detail. The Applicant is mistaken in asserting that the gardens of both High House Farm and Fristonmoor Barn as being within the curtilage of the listed building. These are two entirely separate properties.</p>	<p>The Applicants do not agree with this interpretation of curtilage. However, as this disagreement does not change the contribution that setting makes to the significance of High House Farm or the impact of the proposals on that significance, the Applicants have no further comment.</p>



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<b>Residential Amenity</b>		
16	SPR say in its response that it has not taken into account "residential amenity" of High House Farm. They say that this is not relevant to heritage impact and then use that as an excuse to ignore the consideration altogether.	The Applicants refer to residential amenity not being a consideration for a cultural heritage assessment. The Applicants are fully cognisant of residential amenity; it is a key consideration within other technical assessments (e.g. <b>Chapter 25 Noise and Vibration</b> (APP-073) and <b>Chapter 29 Landscape and Visual Impact Assessment</b> (APP-077) of the ES) and in design of the Projects, for instance throughout development of the Outline Landscape Mitigation Plan.
17	SPR says that it has always been recognized that the ceiling end compounds and repositioned pylons would be closer to High House Farm. But they now claim that any adverse impact on the significance of High House Farm would be caused by the overall change in the character of the surrounding landscape not the "precise distance between the listed buildings and specific elements of the projects"	The Applicants' understanding of change in the setting of High House Farm and resultant impact on significance has always emphasised the importance of change in landscape character rather than the precise position and appearance of specific pieces of substation infrastructure (see assessment in ES <b>Appendix 24.7</b> (APP-519/520), paras 55-70).
18	As set out in the introduction the amenity impact on residents of High House Farm will be utterly devastating. SPR conveniently forgets that it has drawn the very boundary of the site at the garden fence of High House Farm with major industrial structures being located just over 200 meters away.	The Applicants would note that although the Order limits do follow the boundary of High House Farm to the south, this is only to allow for woodland planting and the temporary diversion of a public right of way only, with the nearest infrastructure being the sealing end compounds.
<b>Cumulative Impact</b>		
19	SPR was asked about the possibility of other grid connections being made at Friston in EXQs on 12th October 2020. It was to provide a response by 2nd November 2020. SPR declined to offer any evidence.	Ms Cramb's assertion is incorrect. The Applicants provided answers to ExQs1 1.0.18 and 1.14.1 on 2 <sup>nd</sup> November 2020 stating that their position regarding a cumulative impact assessment (CIA) of the Projects with Nautilus and/or Eurolink remained unchanged since submission of the Applications due to the





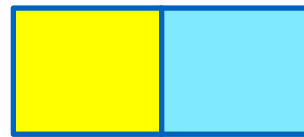
ID	Fiona Cramb's Comment	Applicants' Comments
		lack of available information. Indeed, the Applicants' position on this matter continues to remain unchanged and this is set out within <b>section 1.1</b> of the <b>Extension of National Grid Substation Appraisal</b> (REP8-074).
20	SPR was asked again about this matter again in ExQ's on the 12th February 2021 and asked to respond by Deadline 6. Yet again SPR declined to provide any information and insisted that there was no need to look to Eurolink or Nautilus.	Ms Cramb's assertion is incorrect. In their answer to ExQs2 2.0.14, the Applicants set out what level of appraisal they consider possible with the information available on Nautilus and Eurolink and state that the work could be completed and submitted to the Examinations by Deadline 8 (this being the <b>Extension of National Grid Substation Appraisal</b> (REP8-074)).
21	It has been the consistent tactical position of SPR throughout to block any attempt to address cumulative impact.	The Applicants have no further comment and would refer to the responses given at ID19 to ID27.
22	SPR finally came clean at deadline 8 admitting that there were in fact other connected projects in the offing, a fact that it has self-evidently known about for a long time. Yet even now it only offers scant evidence in relation to Eurolink and Nautilus and only in relation to the extension of the NGET substation that would be required.	The Applicants stated in their answer to ExQs2 2.0.14 (at Deadline 6) that they would provide updated information regarding any potential for the Projects to result in cumulative impacts with Nautilus and/or Eurolink, but that this would only relate to the hypothetical extensions of the National Grid substation as possible locations for these are in the public domain and the likely infrastructure within them (electrical gantries) could be matched to the existing design of the National Grid substation.
23	SPR is now forced, despite past denials, to admit that these projects will have an impact. The truth of the matter is that SPR's approach throughout to cumulative impact has been to dissemble and obfuscate. Even now its disclosure of relevant material is desultory. It has not concluded any proper CIA evaluation. It has not disclosed any relevant internal evidence to substantiate its assertions.	See response at ID22. Additionally, the Applicants would note that the information within REP8-074 is not intended comprise a CIA. This is for the reasons stated in <b>section 1.1</b> of that document, namely that there is still insufficient information on Nautilus and Eurolink to undertake a CIA.



ID	Fiona Cramb's Comment	Applicants' Comments
24	<p>In any event the evidence submitted is deeply unsatisfactory. For example, in relation to North Falls and Five Estuaries SPR now says that these will not connect at Friston. In the CIA documents they say they rely on publicly available information. However, so far as relevant publicly available information is concerned both the relevant websites contradict SPR's position. They say that the no decision has been taken about connection points. So Friston therefore remains a distinct possibility.</p>	<p>The Applicants would refer to the submissions made by both North Falls (REP7-066) and Five Estuaries (AS-100) confirming that these projects will not connect to the grid near Leiston.</p> <p>This is not therefore a statement from the Applicants, rather a clear position confirmed by North Falls and Five Estuaries and it is misleading to suggest otherwise.</p>
25	<p>In the document submitted at Deadline 8 "Extension of National Grid Substation Appraisal Applicants: East Anglia ONE North Limited and East Anglia TWO Limited Document Reference: ExA.AS-32.D8.V1 SPR Reference: EA1N_EA2- DWF-ENV-REP-IBR-001029", under the potential impact of extension of the NGET substation, SPR has now been forced to concede that there will be a real and significant impact at the very least on shore ecology, on shore ornithology, archaeology and cultural heritage and landscape.</p>	<p><b>Extension of National Grid Substation Appraisal</b> (REP8-074) does not conclude any new significant impacts. <b>Section 3</b> of REP8-074 provides a 'screening' of 'potential' cumulative impacts and concludes there is "<i>potential for operation phase cumulative effects regarding onshore ecology, onshore ornithology, landscape and visual amenity and cultural heritage</i>". A more detailed consideration of these topics is then presented in <b>Section 4</b>. The appraisals presented in <b>Section 4</b> all conclude that the hypothetical extensions to the National Grid substation would not change the conclusions of any of the relevant technical assessments presented within the ES.</p>
26	<p>On archaeology and cultural heritage SPR says:</p> <p><i>"The National Grid substation extensions would enlarge the footprint of the National Grid substation, potentially increasing the level of visual change in the setting of adjacent heritage assets. This could result in additional harm to the significance of these assets."</i></p> <p>On landscape SPR says:</p> <p><i>"The National Grid substation extensions would enlarge the footprint of the National Grid substation. There is potential for additional direct physical landscape effects; an intensification of</i></p>	<p>Ms Cramb is referring to <b>Table 3.1</b> in <b>Section 3</b> of REP8-074, which provides a 'screening' of 'potential' cumulative impacts; the actual appraisal for these topics is presented in <b>Section 4</b>.</p> <p><b>Section 4.3</b> on Landscape and Visual Amenity concludes that:</p> <p><i>"While there is an intensification of visual effects as a result of the National Grid substation extensions, these would not increase the thresholds of magnitude of change and significance of visual effects already assessed for the onshore substations and National Grid substation, as contained within APP-567, APP-077 and REP4-031."</i></p>



ID	Fiona Cramb's Comment	Applicants' Comments
	<p><i>significant effects on local landscape character; and an increase in the lateral spread and influence of the National Grid substation in views from the surrounding area. .“</i></p> <p>The Authority should take the position that SPR has fully had its say. It has set out its definitive position. The Authority should conclude that SPRs analysis is partial and inadequate and that it has simply failed to satisfy the Authority on cumulative impact.</p>	<p><b>Section 4.4</b> on Cultural Heritage concludes that:</p> <p><i>“In conclusion, it is considered that the National Grid substation extensions would not result in any significant cumulative impacts on the significance of heritage assets.”</i></p>
27	<p>The effect of this is that SPRs analysis of the impact upon High House Farm is also flawed. It has failed to take into account the cumulative impact of further successive developments on heritage and residential amenity</p>	<p>See responses at ID25 and ID26.</p>
<b>Extension of the Examination</b>		
28	<p>Finally, I strongly support the objections made by all the affected groups including SEAS and SASES to the extension of this inquiry, which has been shown to me. The extension decision came as a bolt from the blue and coincided, more or less, with the moment that we had all finalised our last submissions and evidence. I agree with all the points made in that objection.</p>	<p>This is a matter for the Examining Authority.</p>
29	<p>The ExA had not read or absorbed any of that material when it applied for the extension so I am at a loss to understand how the ExA can say that there are gaps in the evidence? The timetable set by the ExA was designed to ensure that the evidence was complete.</p>	



## Applicants' Comments on Fiona Cramb's Deadline 9 Submissions

6<sup>th</sup> May 2021

ID	Fiona Cramb's Comment	Applicants' Comments
30	The extension is grossly unfair. I have to say that I feel that this procedural decision has been taken to assist SPR, with its unlimited resources, and no one else.	
31	It can only benefit only SPR who the ExA is now giving an extra 3 months to plug gaps in its case. How can this be fair when SPR has had more than enough opportunity to put forward its case, and its claims to have done so.	
32	The extension simply ignores the fact that we, as a community, are exhausted both emotionally and financially by the process and were entitled to, take the ExA at its word when it indicated that proceedings were at an end.	