



# SPR EA1N and EA2 PROJECTS

## DEADLINE 11 – RESPONSES TO EXQS3

Interested Party: SASES      PINS Refs: 20024106 & 20024110

Date: 7 June 2021      Issue: 1

### INTRODUCTION

As SASES is responding to a small number of questions responses have been provided in this format rather than a table.

### 3.8 HISTORIC ENVIRONMENT

#### 3.8.4 Cumulative Impacts

(a) SASES welcomes the Applicants' acknowledgement that the trackway to the north of the church, which follows the line of the parish and hundredal boundaries, should be considered to be a heritage asset in its own right. This trackway provides a link between the medieval settlement core of Friston, which focussed on the parish church, and the outlying farmsteads to its north. As such, the trackway serves as a physical testament to the historical relationship between the settlement, embodied in the church, and the farming economy which supported its population. It is our opinion that this connection between the designated heritage assets of the church to the south and the farm complexes to the north (primarily Little Moor Farm, but also High House Farm) does increase the significance of these heritage assets and serves to emphasise that these features do not stand in isolation but are in fact part of a coherent medieval landscape.

(b) As has been discussed at length in previous submissions, it is considered that severance and removal of this historic trackway would have a strong detrimental effect on the designated heritage assets located at either end of it. This is in addition to the direct negative impact which the proposals would have on the heritage asset of the trackway itself. Previous submissions from SASES, the Applicants, the Councils and Historic England have all identified the impacts on the settings of the individual heritage assets which will be brought about by the dramatic change of landscape character caused by the construction of the proposed substations and National Grid infrastructure. A key element of this identified harm is the severance of the long views between the Church and the farmsteads to the north (and vice versa) and the removal of the trackway between them. Both of these impacts have the effect of breaking the historical link between the medieval settlement and its agricultural hinterland, which can presently still be clearly read in the landscape to the north of Friston. As highlighted here, it is considered that the legible survival of this interrelationship does enhance additionally the significance of the Church, Little Moor Farm and also High House Farm. Therefore, the detrimental impact of the proposed development on the significance of these assets would be similarly greater, given that they would result in the breaking and total erasure of this historical connection.

### 3.14 OTHER PROJECTS AND PROPOSALS

#### 3.14.5 Future Uncertainty

In order to answer this question it might be of assistance to break it down into its constituent elements as follows.

*Bearing in mind any implications of the Norfolk Vanguard judgement, how would the parties propose the ExAs advise the Secretary of State in relation to the uncertainty about possible future development:*

*(a) at Friston; and*

*(b) in the wider area,*

*created:*

*(i) by the precedent case, in the event that either one or both projects is approved, and*

*(ii) by the clear evidence submitted to the examinations that:*

*(aa) the potential to extend the proposed National Grid substation has been demonstrated and*

*(bb) the proposed Eurolink and Nautilus inter-connectors are exploring a landfall location between Thorpeness and Sizewell and the possibility of making a National Grid connection in the Leiston area, via onshore substations\* located within 5k of a National Grid substation?*

\* SASES understands the reference to onshore substations to mean onshore converter stations

#### Sub question (a) at Friston

In relation to (a)(i) and the impact of the Norfolk Vanguard judgement, SASES refers to its deadline 6 submission on Pearce v Secretary of State for Business Energy and Industrial Strategy (North Vanguard) (REP6-136). The Applicants have failed to carry out a cumulative impact assessment which they have freely admitted – see ID2 of the Applicants' Deadline 10 submission Applicants Comments on SASES Deadline 9 submissions (REP 10–020). Such failure is in breach of the EIA regulations and irrational, and the applications cannot lawfully be granted without such an assessment being carried out.

In relation to (a)(ii), there is no substantive uncertainty about possible future development at Friston given such clear evidence of the desire to form connections in the Friston location. Moreover, the National Grid NSIP has been designed to allow (a) potential extension of the National Grid substation without any changes to the other substantial National Grid infrastructure (b) accommodation of further projects through the three cable sealing ends. In short, the existence of future connections in this location is not uncertain or speculative, but clearly anticipated and indeed “designed in” to the National Grid NSIP. Given this lack of uncertainty there is no excuse for the Applicants' failure to carry out a cumulative impact assessment. Such failure is in breach of the EIA regulations and irrational, and the applications cannot lawfully be granted without such an assessment being carried out.

#### Sub question (b) in the wider area

SASES has commented on this matter in its Deadline 9 Submission Comments on National Grid Substation Extension Appraisal (REP9–075), in that there is information as to the nature of the proposals which is sufficiently clear to form the basis of an assessment both in terms of

the landfall and part of the cable route. This is recognised in subparagraph (bb) above. However, no such assessment is before the Examinations. Further given the clear evidence concerning the extension of the proposed National Grid substation the National Grid connection will most certainly be at Friston in the “Leiston area”. In addition it is known that the converter stations (which are up to 12 acres in footprint and up to 25m high) will be located in the local area and will no doubt require substantial landscaping in the same manner as the EA1N and EA2 substations and the National Grid infrastructure. Therefore in respect of (b)(i) following SASES submission in respect of Pearce the failure of the Applicants to carry out a cumulative impact assessment is in breach of the EIA regulations and irrational, and the applications cannot lawfully be granted without such an assessment being carried out.

In respect of (b)(ii) as stated above there is information which would enable a cumulative impact assessment carried out and such failure is a breach of the EIA regulations and irrational, and the applications cannot lawfully be granted without such an assessment being carried out.

### Broader Issues

This question raises broader issues which require consideration by the Secretary of State including the following.

National Grid NSIP - As SASES has previously submitted, the National Grid infrastructure is in substance a new National Grid connection hub designed to serve a number of projects not just EA1N and EA2. Some of the present difficulties concerning these applications might have been avoided had National Grid brought forward its own NSIP for a new connection hub on the East Coast to serve a number of proposed offshore windfarm projects and interconnector projects.

Design - whilst the focus of the examination has been the design of the Scottish Power substations and National Grid infrastructure there is a broader design point in relation to the continuing use of radial connections specific to each windfarm project. The establishment of the Offshore Transmission Network Review and comments in the House of Commons most recently at Prime Minister’s questions demonstrate that the current design approach to onshore transmission is not “sustainable”.

National Grid’s Compliance with the Electricity Act 1989 - SASES has made submissions that the choice by National Grid of Friston as a connection location requiring a new National Grid connection hub is contrary to the requirements of Section 9 and Schedule 9 of the Electricity Act 1989.

## **3.17 SOCIO-ECONOMIC EFFECTS**

### **3.17.2 Tourism Fund**

The Applicants have not properly assessed the risk to the tourism sector which is a key part of the local economy – see ISH5 Post Hearing Submission Agenda Item 3 (REP5-101). Also the Applicants have demonstrated a lack of familiarity with the area particularly in comparison with Bramford - see the Applicants’ comments on SASES’ ISH5 Post Hearing Submission and SASES’ response (REP8–232).

Relative to the risk to the tourism economy the sum of £150,000 is insignificant. Furthermore there is no rationale as to why this is an appropriate sum. In reality it is merely a tokenistic gesture.

No weight should be given to this fund.

#### **3.17.4 Traffic and effects on tourism**

SASES will await the Applicants' response to this question. In the interim SASES would point to the very different nature of the existing substation site at Bramford and relative to Friston its easy accessibility by road (REP5-101 EA1 Comparison)

In terms of landfall and the cable route whilst the Bawdsey landfall and the initial part of the cable route are in the AONB, this area is on the southern edge of the AONB, closer to the A14 with much the intervening A12 being dual carriageway.

In contrast the proposed projects are to be developed in the heart of the AONB and its surrounding area which contain many of the hotels, holiday houses/cottages, attractions, events, villages, seaside towns, cycle routes and footpaths which draw visitors to the Suffolk Heritage Coast all of whom travel on the single carriageway A12. The projects' landfall, cable route and substation site are to the north of the seaside towns of Thorpeness, Aldeburgh and Orford and the internationally renowned concert hall and retail destination at Snape Maltings, and south of RSPB Minsmere, the National Trust site of Dunwich Heath, Walberswick and Southwold.