

**SCOTTISHPOWER  
RENEWABLES**

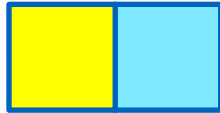
# **East Anglia ONE North and East Anglia TWO Offshore Windfarms**

## **Applicants' Comments on Fiona Cramb's Deadline 11 Submission**

Applicant: East Anglia TWO and East Anglia ONE North Limited  
Document Reference: ExA.AS-21.D12.V1  
SPR Reference: EA1N\_EA2-DWF-ENV-REP-IBR-001120

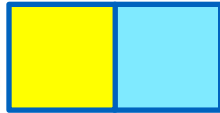
Date: 28<sup>th</sup> June 2021  
Revision: Version 1  
Author: Royal HaskoningDHV

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



Revision Summary				
Rev	Date	Prepared by	Checked by	Approved by
01	28/06/2021	Paolo Pizzolla	Lesley Jamieson / Ian MacKay	Rich Morris

Description of Revisions			
Rev	Page	Section	Description
01	n/a	n/a	Final for Submission



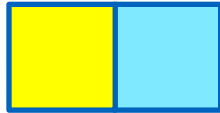
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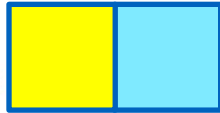
## Glossary of Acronyms

ALO	Agriculture Liaison Officer
DCO	Development Consent Order
ECoW	Ecological Clerk of Works
ExA	Examination Authority
NGESO	National Grid Electricity System Operator
PD	Procedural Decision
PRoW	Public Rights of Way
RSPB	Royal Society for the Protection of Birds
SASES	Substation Action Save East Suffolk
SCC	Suffolk County Council
SCCAS	Suffolk County Council Archaeological Service
SPR	ScottishPower Renewables



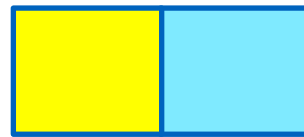
## Glossary of Terminology

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.



## 1 Introduction

1. This document presents the Applicants' comments on Fiona Cramb's Deadline 11 submission – Responses to ExA's Further Written Questions (REP11-143).
2. This document is applicable to both the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications (the Applications), and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's (ExA'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 Comments on Fiona Cramb's Deadline 11 Submission – Responses to ExA's Further Written Questions (REP11-143)

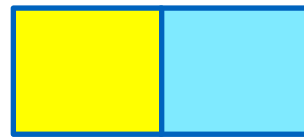
### 2.1 Obstruction of Views and The Marching Pylons

ID	ExA Question	Fiona Cramb's Comment	Applicants' Comments
<b>3.8 Historic Environment</b>			
1	<p><b>3.8.2 High House Farm</b></p> <p>Your Deadline 10 document [REP10-025] states that the current view of the Church from High House Farm would be obstructed by mitigation planting rather than by the proposed Project's electrical infrastructure.</p> <p>While this statement may be technically correct, does it sufficiently describe and characterise the adverse effect on this heritage asset, taking into consideration that the proposed planting will be established solely to screen the proposed projects and will take time to establish</p>	<p>The ExA is correct. The position is very clear. At present there is a clear view of the Church from the garden and the ground, first and second floors of [REDACTED]. This view exists in summer as in winter. This view stretches over open ground. It is uninterrupted. Ariel photographs do not, for obvious reasons, show the view from the ground.</p> <p>The proposed works will obliterate that view. SPR's answer in effect recognises this. It says that the "church tower" or some part of it would be visible between "the western sealing end compound and the main group of substation structures". So, at its highest, there will a view of some part of the tower (not the church) sandwiched and squeezed between two much closer pieces of industrial infrastructure. On any rational view this is obliteration. But in any event SPR's point is immaterial even if it were true, as the ExA recognises, and portion the tower were visible it will subsequently be concealed by the mitigation. Either way it is the</p>	<p>Noted. Please refer to the <i>Applicants' Responses to Examining Authority's Written Question 3: Volume 6 – 3.8 Historic Environment</i> (REP11-090) for the Applicants' position on the relevance of this view to the heritage significance of High House Farm and the Church of St Mary the Virgin, Friston.</p>

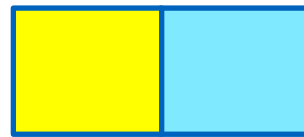


ID	ExA Question	Fiona Cramb's Comment	Applicants' Comments
		consenting of the development which will sever the connection between [REDACTED] and the village and the Church.	
<b>3.10 Landscape and Visual Effect</b>			
2	<p><b>3.10.3 Combined effect of pylons and proposals</b></p> <p>Pylons are often referred to as 'marching across the landscape', which partly could be a consequence of their height and form but also due to the open frame of the pylons themselves and the space that remains beneath them. SASES [REP6-133] state that the proposals would have the effect of making the pylons more dominant than they currently appear, due to the change in the landscape around them that the proposals would cause with an open rural landscape being replaced by a more industrial one</p> <p>Respond to the above point.</p>	<p>Again, the questions posed by the ExA identify the true issue. The space into which this vast structure will be placed is rural. It is tightly constrained all around by houses . At present it is a rural landscape only interrupted by pylons. Over time all local residents have become familiar with the pylons and they do not ruin the rural nature of the area. There can be no doubt but that the development would result in a switch from a rural landscape to a wholly industrial one. NO amount of wishful thinking by SPR can alter this brute reality.</p> <p>We note also that SPR acknowledges that it has not taken into accounts the impact of other cumulative impact projects upon mitigation. SPR say in answering ExQ2.10.8 [REP6-063]: 8.</p> <p><i>"The Applicants are not designing the landscaping proposals to accommodate any future projects. Any potential future connections would need to work within the constraints of the Projects' onshore infrastructure and landscaping and address</i></p>	<p>The two quotes provided by Ms Cramb are not inconsistent but do appear to be unrelated. The Applicants are unable to prepare landscaping proposals for other projects, not only due to there being no information on their location or design, but because this is the responsibility of their developers (should other projects come forward). The Applicants note that interaction of any future projects with the Projects must ensure no detriment to the operation of the Projects, and any interaction with the Projects landscaping or surface water drainage would have to be assessed, controlled and mitigated as part of any future project's consent application.</p> <p>The Applicants have now made several submissions to the Examinations on the matter of other projects. Cumulative impact assessment requires an understanding of different projects' potential impacts and how their zones of influence may interact; detailed knowledge on location and potential impact is crucial to this. Of the projects that different parties' submissions to the Examinations have asserted will connect to the grid at Friston:</p> <ul style="list-style-type: none"> <li>National Grid Ventures' (NGV's) Deadline 3 submission (REP3-112) states that while it has</li> </ul>



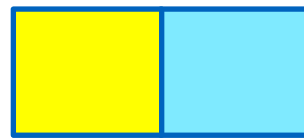


ID	ExA Question	Fiona Cramb's Comment	Applicants' Comments
		<p><i>this within their scheme design and consent application.</i></p> <p>Yet, inconsistently SPR has also said, as again the ExA has pointed out</p> <p><i>"The planting and landscape scheme has also been designed in order to not sterilise land for potential future development associated with the National Grid substation."</i></p> <p>The underlying reality, as has been made clear by the detailed submissions of many parties is that that SPR and others are planning to use Friston as a hub and plug for multiple future projects. Yet there has been no CIA of the substantial additional adverse effects that this will have.</p>	<p>engaged in early discussions with stakeholders and maintained a dialogue with National Grid Electricity System Operator (NGESO), at no point has this translated into a confirmed grid connection at Friston for Nautilus or Eurolink. NGV's Deadline 11 submission (REP11-119) states that a grid connection at Friston is an assumption in its site selection process for these projects. Public consultation on this site selection process will not commence until late summer 2021 and Environmental Impact Assessment scoping will not occur before the first quarter of 2022.;</p> <ul style="list-style-type: none"> <li>• It has been confirmed that Five Estuaries is pursuing a grid connection away from the Friston area (AS-100); and</li> <li>• It has been confirmed that North Falls is pursuing a grid connection away from the Friston area (REP7-066). Additionally, there is currently <u>no information</u> regarding possible locations for the North Falls infrastructure.</li> </ul>



## 2.2 Ecological Complaints, Ground Investigation Works and Community Engagement and Control Measures

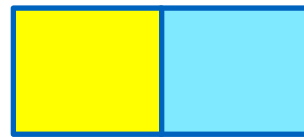
ID	Fiona Cramb's Comment	Applicants' Comments
<b>Ecological Complaints</b>		
1	<p>11. SPR says (Applicant's statement regarding Ground Investigation Works dated 6th May):</p> <p>"53. A member, or members, of the public have lodged complaints and concerns with Natural England, and Suffolk Constabulary (Rural and Wildlife Policing) regarding alleged disturbance to breeding birds [REDACTED] as a result of the onshore site investigation works. 54. No complaint or concern has been substantiated by the claimant. The Applicants have addressed all such complaints and concerns with the relevant organisations to their satisfaction, through confirmation of the ECoW's role, undertaking of daily ecological walkover surveys, establishment of suitable exclusion works around protected species and amendment of the onshore site investigation works areas as required. 55. The Applicants consider such complaints to be the result of a concerted effort to discredit the management of the onshore site investigation works."</p> <p>12. The present investigatory works being carried out by SPR have led to the wholesale despoliation of the land intended as the proposed site. Breeding birds have fled. Local residents have complained to SPR whose response has been that they have carried out the necessary assessments. Yet when asked they refuse point blank to disclose these reports.</p> <p>13. We and many others were shocked to see the works commence despite the presence of ground nesting birds and the accompanying</p>	<p>Ecological and environmental surveys, maps and plans have been consulted and reviewed to avoid any areas where there is any potential risk of ecological disturbance. The investigations are undertaken with a team including an independent Ecological Clerk of Works (ECoW) and an agricultural liaison officer (ALO).</p> <p>All work areas are inspected by an ECoW prior to commencement and throughout the works, and no work is undertaken if there is a risk of disturbance to any protected species or nesting birds.</p> <p>All ecological receptors have exclusion buffers where no works are permitted prior to works, such as absolute minimum distances away from trees, hedges or specific species.</p> <p>Any transient constraints that may arise, such as nesting birds, are monitored by the ecologists and appropriate exclusions implemented throughout the entirety of the works.</p> <p>Relevant authorities such as Natural England and the Royal Society for the Protection of Birds (RSPB) are regularly liaised with regarding both particular species and protected sites, as well as the mitigation being implemented on site. All authorities have confirmed they are satisfied with the Applicants' response to support the works.</p> <p>The Applicants have not undertaken any spraying in the area, nor has it instructed any contractor to do so.</p>



ID	Fiona Cramb's Comment	Applicants' Comments
	<p>destructive spraying of the fields. SPR say that they are not responsible for this. Irrespective of the veracity of this claim none of this destruction would have occurred had they had delayed the works until after the breeding season as they have been obliged to do so in other more protected areas such as the SPA and SSSI. However, the birds nesting on the site are protected by law.</p>	
2	<p>14. Many in the local community wrote to SPR to ask for the evidence on which they based their decision to start these works. I was told they are unable to share the results of the surveys they say they have undertaken as they are "sensitive". This is nonsense and, yet again, an illustration of a lack of candour by SPR. The ExA should demand that the reports that SPR rely upon are made public.</p> <p>15. It is in any event extraordinary that SPR claim that there is a "concerted effort" to discredit their management team. Residents and concerned individuals are perfectly within their rights to report any potential breaches of the law to the police.</p>	<p>As part of the ground investigation works the Applicants have deployed an appropriately qualified ECoW who has overseen and supervised the works.</p> <p>During the Examinations, local interest groups have published sensitive information which is inappropriate and has the potential to compromise the protected species.</p>
<b>Ground Investigation Works</b>		
3	<p>16. The Ground investigation works SPR are currently undertaking, the manner in which they been carried out and the communication about this work starkly illustrates the negative, disruptive and devastating impact that the project will have on the area and the quality of life of the residents living in Friston, those whose homes and businesses surrounding the substation site and those who live along the cable route.</p>	<p>The process of early ground investigations is routine to support the detailed design of the Projects, should consent be granted. In planning the ground investigations, the locations around the site have been chosen to strike a balance between minimising disturbance to the people, places, ecology and wildlife in the area and meeting the requirements of the regulators for these investigation works.</p>



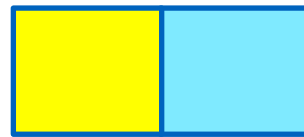
ID	Fiona Cramb's Comment	Applicants' Comments
		<p>The Applicants' communications concerning these works have sought to provide as much information as possible about the surveys, their location, the activities and traffic movements.</p> <p>Regular updates have been and will continue to be provided to the relevant area parish councils, key interest groups and other individuals, to advise of key activities.</p> <p>Where residents raise a particular issue, these are raised with the site teams for resolution. We respond to individuals accordingly.</p>
4	<p>17. The site is a tight site completely filling the area between the houses that encircle Fristonmoor and the village. It is the maximum size it could be within the physical limit of these properties and Grove Road. So the site boundaries run right up to the garden fences of properties such as mine.</p>	<p>The Applicants would note that the Order Limits are sized appropriately and land outside the proposed substation footprints and associated work areas required for construction is required to facilitate comprehensive landscaping mitigation planting.</p>
5	<p>18. These works are already causing high levels of anxiety amongst those who live around the site. We can no longer safely walk the paths as they are being used by vehicles and have been churned up and rendered impassable. There is also the noise of digging, drilling and vehicles beeping. This is a foretaste of what is to be inflicted on us by SPR in this wholly unnecessary project.</p>	<p>The Applicants have implemented a number of measures to ensure public safety around the site, including the use of banksmen / vehicle marshals to safely manage the people and plant interfaces, installation of designated access routes to avoid public rights of way (ProW) where practicable, and traffic calming to reduce speed limits in the vicinity of site access points to allow for safe access and egress for workers and members of the public. Reduced speed limits are also being implemented on public rights of way and all vehicle movements to support the works are carried out in accordance with the traffic management plan approved by Suffolk County Council (SCC).</p> <p>It should be noted that the Applicants have permission to use public rights of way as a means of traveling between sites, but minimises their use during the investigation works.</p>



ID	Fiona Cramb's Comment	Applicants' Comments
		<p>Pre-condition surveys were undertaken prior to investigation works commencing to allow for any reinstatement to the previous condition on completion of the works.</p> <p>In order to minimise noise disturbance to local people from the ground investigation works, work areas are surrounded by acoustic noise barriers at key noise receptors.</p> <p>These are not often used during this type of activity but the Applicants requested their use by the contractor to minimise noise disturbance to wildlife and local people.</p>
6	<p>19. SPR asserts that the work is being done pre consent because: <i>“Such onshore site investigation works are typically undertaken post consent given the cost of the surveys and the potential disturbance to landowners’ activities. However, the Applicants have scheduled these site investigation works to be undertaken at the present time in order to maintain the Projects’ development programme and allow for the rapid deployment of offshore wind capacity in line with the Government’s strategy should the Projects receive consent”</i></p> <p>20. However it is much more likely to be due to the fact that, midway through the hearings, SPR brought forward the dates for these projects to avoid being an early opportunity or pathfinder project under the proposals made in the BEISS Offshore Transmission Network Review; thus failing to support BEISS and Ofgem’s stated aim of “... increasing the level of coordination in offshore electricity infrastructure”. SPR insists on pushing on with Friston in the face of huge local opposition and the availability of other more suitable Brownfield sites</p>	<p>The Applicants’ disagree with the comments made and refer to <b><i>Applicants’ Statement regarding Ground Investigation Works</i></b> (REP10-029) submitted at Deadline 10, which sets out why these surveys are being undertaken. In addition the Applicants have explained why they have sought to bring forward the delivery dates. It is linked to the coordination of the delivery of East Anglia schemes and applications in relation to this were made at the start of 2020. The claimed motivation for the Applicants actions is not accurate.</p>



ID	Fiona Cramb's Comment	Applicants' Comments
<b>Community Engagement and Control Measures</b>		
7	<p>21. SPR's claims that it has active and effective community engagement team. However, despite repeated requests to Ms Berry to provide a schedule of works that might be taking place close to our boundary they claim to only be able to give one or two day's notice because the schedule is subject to change.</p>	<p>The Applicants been clear throughout that these works are dynamic in nature and at the start of the works provided an overview of the works taking place and in what area i.e. archaeology works starting at the substation site and working east and the SI works starting at landfall and working west. Notifications are provided as information becomes available, and sometimes this means that it can only be provided the day prior to the activity.</p>
8	<p>22. On a number of occasions I requested information about whether drilling and trenching was planned close to our boundary and when this was likely to occur. On 26th of May I received a letter via email from the Community Engagement team informing me that works would be taking place within 100 m of my boundary and in line with their Control Measures asking me whether I would like acoustic barriers erected and to reply by May 28th.</p> <p>23. In fact, the works are within 4 or 5 metres of the boundary to the house.</p> <p>24. The letter was, as is usual and despite my having sent corrections previously to the team, marked with an incorrect address.</p> <p>25. At all events such when the offer of acoustic protection was made the horse had bolted and the work had already been carried out with a great deal of accompanying noise and dust.</p> <p>26. SPR had breached their own Control Measures as the trenching work was started on Friday 21st May and completed on the 24th. No promised rolling barriers were ever put in place.</p> <p>27. My questions about drilling remain unanswered.</p>	<p>See above. The Stakeholder Team provides information and sends out letters/notifications as soon as the information becomes available.</p> <p>The location of the trial trenches have been agreed with Suffolk County Council Archaeological Service (SCCAS). The trial trenching includes trenches at the location of proposed landscape planting.</p> <p>The letter referred to was received by Ms. Cramb. Where full addresses were not known, hand deliveries of letters have been undertaken. The road was incorrectly named, and the Applicants confirmed that this was a mistake. However, the letter was emailed and therefore did not require a postal address. Subsequently the Applicants' contact database has been updated.</p> <p>The letter stated that Ms. Cramb's property lies within 100 metres of the Order limits and that works were planned within the Order limits.</p> <p>As a noise and visual mitigation measure (an offering of good faith), the letter offered landowners the choice of an acoustic barrier extending the full length of their property, or acoustic barriers on a rolling basis, which was a smaller length of barrier that was erected between the excavator and the property during trench excavation and backfilling. This activity does not generate extensive noise and dust and is a relatively short term activity.</p>



ID	Fiona Cramb's Comment	Applicants' Comments
		<p>With the exception of Ms. Cramb's property, where the Applicants wrote to Ms. Cramb apologising, no work was undertaken at the boundary of any property until the resident had received their letter and informed the Applicants of their choice of acoustic barriers to be used while the investigation works were being undertaken.</p> <p>Ms. Cramb wrote to the Applicants' Stakeholder Team on 24<sup>th</sup> May highlighting a concern about the planned drilling. This communication was received on the 24<sup>th</sup> May and a response was provided on the 27<sup>th</sup> May, which explained that the programme changed daily. This correspondence also provided an estimation of when investigation works would be completed at the onshore substations location. There was no drilling in the vicinity of Ms. Cramb's property. The Applicants confirm that the nearest drill (associated with the geotechnical and geo-environmental investigations) to the boundary of Ms. Cramb's was approximately 300m southeast.</p>





## 2.3 Impact on High House Farm / Heritage Assessment

ID	Applicants' Response to Fiona Cramb's Comment	Fiona Cramb's Response	Applicants' Comments
1	With regard to the Applicant's comments on my Deadline 9 submission I do not intend to repeat submissions that I have already made which I consider to be correct and compelling. I therefore concentrate only on the few issues that I set out below.		Noted.
<b>Impact on [REDACTED] / Heritage assessment</b>			
2	<p><i>Fiona Cramb's Deadline 9 Comment</i></p> <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><i>Applicants' Deadline 10 Comments</i></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</p>	<p>28. SPR persists in arguing that the impact upon the heritage value of [REDACTED] will be of minor significance. It continues to ignore the fact that the conclusion of Historic England rejects the conclusions of SPR. So does East Suffolk Council. SPR puts all of this down to this down to differences of professional judgment. This mischaracterises the situation.</p> <p>29. First, Heritage England is a true and independent expert. The Council is a public body with a duty of independence. SPR is a self-interested corporation seeking to justify the indefensible.</p> <p>30. Second, if the ExA stands back from this and asks the common sense question – will [REDACTED] and other heritage assets be severely adversely affected – the answer is plain and obvious. SPR intends to place a huge industrial infrastructure in the heart of an</p>	<p>In reply to the first point (28, 29), the Applicants stand by their response on difference of professional judgement at Deadline 10 (quoted by Fiona Cramb in the first column here).</p> <p>On the second point (30), it is simply not correct to state that the substations would be placed “in the heart of an ancient Suffolk village”. The proposed site to the north of the village of Friston is in the setting of several designated heritage assets, including the church at the northern edge of the village. The list of heritage assets potentially affected by the proposed projects was agreed with relevant consultees, appropriate assessments undertaken and, where possible, measures proposed to mitigate adverse impacts on heritage significance. Any residual impacts will be taken into account by the Examining Authority.</p>





ID	Applicants' Response to Fiona Cramb's Comment	Fiona Cramb's Response	Applicants' Comments
	<p>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 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>	<p>ancient Suffolk village and then pretend that it does not matter.</p>	



ID	Applicants' Response to Fiona Cramb's Comment	Fiona Cramb's Response	Applicants' Comments
<b>Residential amenity</b>			
3	<p><i>Fiona Cramb's Deadline 9 Comment</i></p> <p>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.</p> <p><i>Applicants' Deadline 10 Comments</i></p> <p>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</p>	<p>31. In relation to the impact of the development on the residential amenity of our property SPR refers to technical assessments contained in the Environmental Statement. I endorse submissions made by SASES and SEAS's experts on these technical matters. I have made previous written and oral submissions about the devastating impact that this development would have on us. Indeed the last few weeks have provided a depressing foretaste of what we will have to endure during the prolonged construction phase. That is before we are faced with living with a huge industrialised complex on our doorstep separating us from the village.</p>	<p>The Applicants have no further comments and would reiterate that they are fully cognisant of residential amenity, that it is a key consideration within the relevant technical assessments presented in the Environmental Statement and has played an important role in development of the Outline Landscape Mitigation Plan and the <b>Substations Design Principles Statement</b> (AS-133).</p>
<b>SPR approach</b>			
4	<p><i>Fiona Cramb's Deadline 9 Comment</i></p> <p>SPR says that it has always been recognized that the ceiling end compounds and repositioned pylons would be closer to High</p>	<p>32. SPR admits that its analysis of impact has not taken account of "...the precise position and appearance of specific pieces of substation infrastructure". Instead SPR looks only at change in landscape character". This</p>	<p>The Applicants note that there are differences between the assessment of visual effects and assessment of effects of heritage setting, with the assessment of heritage setting encompassing a far greater range of factors as set out in Historic England's Setting of</p>



ID	Applicants' Response to Fiona Cramb's Comment	Fiona Cramb's Response	Applicants' Comments
	<p>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"</p> <p><i>Applicants' Deadline 10 Comments</i></p> <p>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).</p>	<p>is very odd indeed. SPR admits to a partial analysis whereby it assumes that the position and appearance of vast pieces of skyline dominating infrastructure are irrelevant to the change in landscape structure.</p> <p>33. This is a serious error and omission on the part of SPR.</p> <p>34. I have attached three photos showing the very close proximity of the Ground Investigation works to our property. The first photo shows our garden fence to the left. The second shows a digger within about 5 metres of the garden. The third is an aerial view showing the proximity of the works as a whole to the house. All of these show what would be to come if the development is consented</p>	<p>Heritage Assets Guidance (Planning Note 3)<sup>1</sup>. As per <b>paragraph 65, Appendix 24.7</b> of the ES (APP-519), the Applicants maintain that it is the onshore substations and National Grid substation which are responsible for the change in character of the landscape and obstruction of views. Whilst the photomontages accompanying both assessments have been used in the assessment of effects upon heritage setting, these are used only as a tool to help inform the assessment. Recognising that the photomontages represent only a limited field of view at particular locations, the conclusions take into consideration information from other sources such as, amongst other things, historic mapping and interrelationships between heritage assets (where identified).</p> <p>The current trial-trenching campaign aims to assess all areas of the order limits where it is considered that buried archaeology might be impacted by the Projects. This includes areas of landscape planting works. This approach is agreed with SCCAS and is considered robust. The Works Plan (onshore) (REP11-004) shows the extent of the overhead line and the onshore construction works, this shows that such works are not in the vicinity of Ms Cramb's property.</p>

<sup>1</sup> <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/>