



SPR EA1N and EA2 PROJECTS

DEADLINE 12 – RESPONSES TO R17 QUESTIONS 18 JUNE 2021

Interested Party: SASES **PINS Refs:** 20024106 & 20024110

Date: 28 June 2021 **Issue:** 1

INTRODUCTION

1. There is set out below SASES' responses to R17Q .7 and R17QF.10 from a landscape and historic environment perspective. These responses have been prepared by SASES experts, Michelle Bolger in respect of landscape and Dr Richard Hoggett in respect of historic environment.

R17QF.7 (c), (d) and (e) – Landscape Response

2. SASES drainage consultant has been pointing out for some time that the woodland within the SUDS basins, described as 'wet woodland' would be incompatible with the use of the basin for drainage. In addition to the incompatibility SPR have accepted that the conditions for wet woodland would not be present, and it has been omitted from the Outline Landscape and Ecological Management Strategy (OLEMS) 11th June Revision: Version 06 (OLEMS). As SASES have been pointing out for some time, there have been significant 'drought' periods in the recent past in this part of East Anglia and it is reasonable to suppose that they will occur in the future.
3. The approach to planting in and around the SUDS basins is an example of the over optimistic approach adopted by SPR with regard to the planting generally. OLEMS Figure 3 has presented a visually misleading view of the SUDS basins suggesting that they would be 'soft' features in the landscape. It is possible that they may be engineered structures. The issue of whether the basins will require bunding has deliberately been left vague although it is shown on OLEMS Figure 4. Depending on their construction the basins may have more in common with the adjacent substations that the landscape that they are replacing.
4. It is unclear why the southern basin has been rotated and it is also unclear why the woodland is shown immediately adjacent to the bund of the northern basin but at some distance from the bund of the southern basin. SASES consider that access to the bunds for maintenance will not allow woodland planting to extend to the toe of the bund.

R17QF.7 - Historic Environment Response

5. The removal of the previously proposed wet woodland from within the proposed SuDs basins has two potential impacts upon the historic environment.
6. The first of these concerns the impact which the overall development has upon the settings of the surrounding heritage assets. As has been discussed at length in previous submission, one of the primary concerns is the significant change in the landscape character within the settings of these heritage assets, from an agricultural landscape to a heavily developed semi-industrialised landscape. While the primary focus has been on the substations, the surrounding infrastructure, pylons and access roads will also contribute to this change of character, and the SuDs basins are an intrinsic part of this infrastructure. If these structures are to be engineered and bunded on their downslope sides, as the

submitted plans suggest they are, then these basins will be read as another artificial element within this semi-industrialised landscape, which will in turn have the effect of extending the developed part of the substation complex further to the west.

7. The second potential impact arises from the removal of woodland planting which was included in the OLEMS in order to soften and disguise the SuDs basins themselves, helping to reduce the effect described above, but also to create additional areas of woodland screening to help reduce the visual impact of the substations when viewed from the west, in the case of heritage, particularly from Friston House and Woodside Farmhouse. The applicant's own heritage assessments already conclude that the proposed planting will do little to mitigate the identified heritage impacts anyway, but the further reduction of planting only has the potential to make this situation worse.

R17QF.10 - Historic Environment Response

8. The indicative construction surface water drainage scheme illustrated in the Outline Code of Construction Practice is one of few documents submitted by the applicants which gives an impression of the scale of the works associated with the construction of the complex. With regard to the potential impact upon surrounding heritage assets, there is a fundamental contradiction in the submitted application documents between those sections of the Environmental Statements which clearly identify a detrimental impact on heritage assets which will be caused by the construction, operation and decommissioning of the onshore infrastructure, and the applicants' submitted assessments of heritage impacts, which focus only on the impact of the operational phase of the scheme and do not consider the likely impacts which are due to be caused by the construction or decommissioning of the schemes' infrastructure.
9. The construction compounds and construction drainage basins depicted give a clear impression of the larger footprint which the construction phase will occupy, and emphasise that the works will be in much closer proximity to the adjacent heritage assets than the narrow focus on the operational phases suggests. In particular, the southernmost construction drainage basin is in very close proximity to Woodside Farm and the grounds of Friston House, resulting in a greater impact upon the setting of these heritage assets during the construction phase. In their submitted heritage assessments, the applicants have sought to dismiss the construction works as temporary and scoped them out on that basis, but SASSES have consistently stated that the construction phase is due to last for an uncertain period of many years and the proposed working area covers a significantly larger footprint than the operational phase of the proposed schemes. 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. This is a clear failure on the part of the applicant to adequately quantify and assess the heritage impacts across the full duration of the scheme.