



RESPONSES TO ExQs1 FOR SPR EA1N and EA2 PROJECTS (DEADLINE 1)

Interested Party: SASES PINS Refs: 20024106 & 20024110

Date: 2 November 2020

Issue: 8

The questions below were marked for SASES or 'Any Applicant' response by Deadline 1, (except question 1.0.1 which is for Deadline 2, and questions 1.2.75 and 1.10.8 for which SASES wishes to volunteer a response).

Copies of relevant document files are provided with SASES Written Representations or are supplied together with this document where stated.

Question Ref.	Question	Response
1.0.1	<p>Good Design Section 4.5 of the Overarching National Policy Statement (NPS) for Energy (EN-1) emphasises the importance placed on ensuring good design in the development of infrastructure projects. This matter is cross-cutting in relation to multiple topics identified within the Initial Assessment of Principal Issues.</p> <p>Whilst the NPS is the primary source of policy under which the applications will be considered, policy within the National Planning Policy Framework (NPPF) advocates for good design as do the 'Design Principles for National Infrastructure', developed by the National Infrastructure Commission.</p> <p>Could the Applicant outline their approach to good design in respect of the following key elements, focusing on how each element reflects the principles of development responding to setting/place and people:</p>	<p>SASES will respond to this question at Deadline 2.</p>

	<p>a) offshore wind turbine generators and associated platforms; b) onshore substations and grid connections;</p> <p>the onshore transmission cable, including any above ground ducting/chambers.</p>	
1.0.3	<p>Design Mitigation: Adverse effects Are the measures set out in section 6.7 of the Environmental Statements (ES) (Onshore Schedule of Mitigation) sufficient to mitigate any adverse effects from the proposed substations and National Grid substation and enable the projects to satisfy the requirements of EN-1, the NPPF and local policies for visual amenity, landscape, public rights of way and heritage matters?</p> <p>a) Provide reasons for your answer. b) If not, what further measures are required?</p>	<p>With regard to ES section 6.7 (Onshore Schedule of Mitigation) and its Chapters as listed below, our responses are as follows:</p> <p>Chapter 19 - See SASES WRs Transport and Traffic, Construction – Substations Site, Construction - Onshore Cable Corridor</p> <p>Chapter 20 - See SASES WR Flood Risk</p> <p>Chapter 21 – See SASES WR Land Use</p> <p>Chapter 22 & 23 - See SASES WR Ecology</p> <p>Chapter 24 - See SASES WR Cultural Heritage</p> <p>Chapter 25 - See SASES WR Noise</p> <p>Chapter 26 - See SASES WR Traffic & Transport</p> <p>Chapter 27 - See SASES WR Human Health</p> <p>Chapter 29 - See SASES WR Landscape and Visual Impact</p> <p>Chapter 30 - See SASES WR Socio- Economic Issues</p>
1.0.4	<p>Design Mitigation: Adverse effects - AONB Is sufficient weight given to the statutory purpose and need for protection of the landscape, character and special qualities of the Suffolk Coast and Heaths AONB both within and from outside its boundary, in accordance with paragraphs 5.9.9 and 5.9.12 of EN-1?</p> <p>a) Provide reasons for your answer.</p>	<p>SASES supports the comments of other community groups in relation to this topic.</p>

	b) If not, what further measures are required?	
1.0.8	<p>Design Principles</p> <p>a) In the context of EN-1 paragraph 4.5.5, explain how the design of the EA1N and EA2 projects meet the National Infrastructure Commission’s Design Principles for National Infrastructure (February 2020) in respect of Climate, Places, People and Value, both offshore and onshore and in all three phases of construction, operation and decommissioning.</p> <p>b) Comment on the desirability of implementing the following measures to ensure that good quality sustainable design and integration of the proposed substations and National Grid substation projects into the landscape is achieved in the detailed design, construction and operation of the projects. How might they be secured? Are any further measures appropriate?</p> <ul style="list-style-type: none"> i) A ‘design champion’ to advise on the quality of sustainable design and the spatial integration of energy infrastructure structures, buildings, compounds, security fences, landscape, heritage, woodland, new landscape features, public rights of way and visual amenity. ii) A ‘design review panel’ to provide informed ‘critical-friend’ comment on the developing sustainable design proposals; iii) An approved ‘design code’ or ‘design approach document’ (as approved in the Hinkley Point C Connector Project (EN020001)) to set out the approach to delivering the detailed design specifications to achieve good quality sustainable design; iv) An outline, including timeline, of the proposed design process, including consultation with stakeholders and a list of proposed consultees. v) In the opinion of the local authorities and other statutory agencies, would the implementation of any or all of the above measures assist in determining post-consent 	<p>See SASES WR Rochdale Envelope and Substation Design</p> <p>See attached response prepared by Rupert Taylor (Acoustic expert) in respect of Noise related matters</p>

	approvals (including the discharge of requirements) in relation to achieving good design?	
1.0.18	<p>Site selection: Friston grid connection point</p> <p>To the extent that it was suggested at OFHs 1 – 2 that there may be additional grid connection proposals for this location, please catalogue any additional connection offers of which you are aware that have been made on a formal or informal basis and submit the best available summary descriptions of the name, purpose, developer and effects of any additional connection proposals that might use this location.</p>	See SASES WR Cumulative Impact Assessment
1.2.75	<p>Growth rate</p> <p>Please expand on your concerns regarding planting growth rates.</p>	SASES questions the assumptions made about growth rates for trees and hedges. Please refer to expert report from Jon Rose which forms part of SASES WR Landscape & Visual Impact
1.10.2	<p>A number of RRs raise concerns about the visual impact of development on Friston, with reference to the adequacy of mitigation.</p> <p>Is further mitigation required and what form might this take? Would additional planting of trees and hedgerows be an appropriate method to resolve this? What form might additional planting take?</p>	See SASES WR Landscape & Visual Impact
1.10.8	<p>ES Chapter 29, paragraph 41 [APP-077] and the OLEMS, paragraph 81 [APP-584] contains the assumptions used for vegetation growth rates. These predictions have been used in the production of the photomontages, illustrating the effectiveness of the planting at year 15. It is stated in the OLEMS (paragraph 84) that heights of taller trees at 15 years post planting are based on an assumption of planting 60cm cell grown plants, with an average annual growth rate of 30cm per year for the first 5 years and 50cm per year for the next 10 years. These assumptions are based on guidance produced by IEMA in 2019. As such the growth rates reported in the OLEMS and the LVIA chapters are a “rule of thumb” to establish growth rate without considering local conditions.</p>	SASES questions the assumptions made about growth rates for trees and hedges. Please refer to expert report from Jon Rose which forms part of SASES WR Landscape & Visual Impact

	<p>ES Chapter 29, paragraph 68 states that the magnitude of change (for both landscape and visual impacts) is assessed at 15 years post planting which results in the assessment of residual impact significance. This is based on the assumption that the planting will be successful at the growth rates provided at paragraphs 81 – 84 of the OLEMS.</p> <p>It is therefore unclear whether this can be considered a worst case scenario in term of assumed growth rates for the purpose of the EIA.</p> <p>Various representations, including from the County Council, ESC and Friston PC also consider that the assumed growth rates are not reasonably justified in the prevailing local conditions given local soil and climatic conditions. The ExA note the applicants' comments on the RRs [AS-036].</p> <ul style="list-style-type: none"> a) Explain the confidence it has in the growth rates for proposed planting assumed for the purposes of the assessment and in the photomontages provided? b) To what extent have these assumptions taken into account the specific growing conditions, including local conditions of soil, drainage, and climate, for relevant species at any particular location? c) What effect would a more cautious approach to growth rates have on the submitted montages? <p>The use of professional judgement should be clearly stated and explained.</p>	
1.14.5	<p>Relevant projects and effects for cumulative impact assessment purposes: grid connections at Friston (OFHs 1 – 3, 7 – 9 October 2020)</p> <p>Parties at OFHs 1 – 3 raised a range of grid connection proposals potentially making use of the National Grid substation proposed to be constructed at Friston. If you have already responded to ExQ1.0 and/ or ExQ1.6 questions on these issues and provided a complete list of projects in response, this question does not need to be responded to. However, if</p>	Please see SASES WR Cumulative Impact Assessment

	<p>you have not responded to those questions or your response does not include a complete list of projects that you are aware of and consider to be relevant, please set out a full list and identify the public information source(s) from which you have made your assessment.</p>	
1.14.6	<p>Relevant projects and effects for cumulative impact assessment purposes: other projects</p> <p>Are there any other projects that are not documented in the ES and are not grid connection projects at Friston (ExQ1.14.5) that are relevant and need to be considered by the ExA?</p> <ul style="list-style-type: none"> • Please identify these projects and identify the public information source(s) from which you have made your assessment that they are relevant. 	<p>Please see SASES WR Cumulative Impact Assessment</p>