

Landscape Briefing Note 3

Project: 1080 East Anglia One North and East Anglia Two
Date: 10th December 2020
Purpose: Notes following Issue Specific Hearings No 2 (ISHs2)
Reference: 1080 BN03 Final Notes following ISHs2- onshore works .docx

Introduction

1. These notes summarise the key issues raised with regard to the landscape and visual impacts of the onshore elements within the DCO applications. All comments are relevant to both applications.

Agenda Item 3b - Strategic siting - approach

2. The applicant took the ExA through the selection process which resulted in the choice of Friston as the location for the onshore SPR substations and the NG substation. However, they failed to acknowledge a, fundamental error in the landscape and visual Red/Amber/Green (RAG) Assessment which renders the choice of Friston as a location unsound.
3. In May 2018 SPR published *East Anglia TWO and East Anglia ONE North Summary and Approach to Site Selection* which identified Friston as the preferred site. The choice was based on the RAG assessment but the full details of the assessment, and in particular the landscape and visual assumptions that underlay it, were not provided until the Preliminary Environmental Information Report (specifically Appendix 4.1) was submitted for consultation in February 2019.
4. The RAG Assessment revealed that a fundamental error had been made with regard to both ‘*landscape character and sensitivity to development*’ and ‘*visual sensitivity to development*’. Both these criteria were assessed as ‘green’ which is meant to indicate ‘*positive attributes*’¹. Neither of these conclusions were supported when the full Landscape and Visual Impact Assessment (LVIA) was undertaken within the EIA.

¹ EN010077-001052-6.3.4.2 EA1N ES Appendix 4.2 RAG Assessment for Onshore Substations Site Selection in the Sizewell Area Para 27

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5. With regard to landscape character sensitivity, the RAG Assessment cites detractors within the wider Estate Claylands LCA (A12, suburbanisation and industrial scale agricultural buildings) when assessing the sensitivity of the landscape around Friston. None of them are present in the landscape around Friston and they are not mentioned for the other site located within the same LCA (Site 6/6A). There is no mention in the RAG Assessment of the distinctive local character at Friston, although ‘distinctive local character’ is given as a reason why Site 6/ 6A has greater sensitivity. However, when the LVIA was undertaken it describes the landscape as follows:

‘The local landscape in the Friston area has a strong sense of place and local distinctiveness, with value deriving from the setting of the landscape to the parish of Friston, the characteristic arrangement of this parish, the village and outlying farmsteads in the open agricultural setting with a simple, rural character, network of fields with strong hedgerow field boundaries, scattered mature deciduous field boundary trees and distinctive backdrop of ancient woodland (Grove Wood).’ (Para 179)
 6. This assessment is in direct contradiction to that in the RAG Assessment. Had a similar understanding of the landscape been shown in the RAG Assessment, the site could not have been assessed as having positive attributes with regard to its ability to accommodate the proposed development. Indeed, the LVIA concludes that the local landscape has *high/medium sensitivity* to the development.
 7. There was a similar failure to accurately assess the visual sensitivity to development of the Friston Area. The RAG Assessment focused on the potential for Grove Wood to screen views however this had already been covered in the criteria relating to ‘*Opportunity to utilise existing features for screening and modify/ mitigate visual impacts*’. The score of ‘green’ indicating ‘*positive attributes*’ was not supported by the LVIA which identified a high degree of visual sensitivity due to the well-used PRoW network and the relationship between this landscape and the village of Friston.
 8. The RAG Assessment did not allow for the severance of a PRoW, the loss of a significant length of that PRoW and the consequent disruption to the PRoW network to register as more significant than the presence of a PRoW within 100m.
 9. Had the RAG Assessment been accurate, the Friston site would not have been identified as a suitable location for the SPR substations and the NG substation. The inability of the mitigation measures to make any significant reduction in either the landscape or visual effects of the development is as a consequence of the misleading results of the RAG Assessment, which indicated that there were attributes to the landscape that would enable it to accommodate the development. It resulted in the selection of a site where adverse impacts cannot be adequately mitigated.

Agenda Item 4b - Landscape and Visual Impact, including upon PRoWs

Identification of harm

10. The approach in the LVIA to identify impacts only as ‘significant’ or ‘not significant’. (Table 29.5 Significance Matrix Page 30) does not provide a clear indication of the severity of the landscape and visual harm. This has been borne out in a recent response by the Applicant to Natural England’s (NE) Deadline 1 response. NE had assumed that significant impacts implied harmful impacts and the Applicant responded:

‘the submitted special qualities assessment does not use the term ‘harm’ to special qualities, instead focusing on assessment of significance. The SLVIA does not necessarily equate significance with harm or unacceptability, which are considered to be further judgements beyond the assessment of significance.’²

11. I agree that there do need to be ‘*further judgements beyond the assessment of significance*’, but these are not provided in the LVIA. Both the landscape and visual effects of the onshore development at Friston result in ‘*higher levels of magnitude, which may typically be those effects that may be expected to result in ‘harm’³*. I have used a best practice approach and interrogated the individual assessments of sensitivity and magnitude of change within the LVIA⁴. Based on these assessments the harm to the local landscape character identified by the LVIA is **major or moderate major adverse** during construction and Year 1 of operation. This only reduces slightly to **moderate major adverse** after 15 years and that assumes highly optimistic tree growth. See below.

² EN010077-002976-ExA.AS-10.D2.V1 EA1N&EA2 Applicants' Responses to NE's Deadline 1 Submissions Page 75

³ EN010077-002976-ExA.AS-10.D2.V1 EA1N&EA2 Applicants' Responses to NE's Deadline 1 Submissions Page 76 .

⁴ EN010077-002776-DL1 - SASES - Written Representation Landscape and Visual pages 50 & 51

Visualisations

12. EN010077-002776-DL1 - SASES - Written Representation Landscape and Visual pages 53-55 sets out the problems with the visualisations. The key issues which we hope will be rectified in the Applicant's next set of visualisations, which we have been told will be prepared to represent the changes to the mitigation proposals promised for Deadline 3, are:

- There are a number of key locations that have not been represented, in particular from Footpath 6 looking towards the village.
- The change in Horizontal Field of View (HFOV) between the 'existing images' and the visualisations makes it difficult to make direct comparisons. This is contrary to Landscape Institute Guidance⁵. We expect the Applicant's next set of visualisations to include an additional image to rectify this omission.

13. At the Hearing three viewpoints were considered that illustrated some of the issues with the visualisations and the accompanying assessment:

- Vp 1 PRoW near Friston House. The LVIA correctly assesses this Vp as being subject to a high magnitude of change at operational Yr 1 but incorrectly described it as being subject to a negligible magnitude of change at operational Yr 15. The planting may have obscured views of the substations by Yr 15 if the highly optimistic growth rates are to be believed. However, even if the trees have obscured views of the substation, there is still a significant change from open views across an undulating landscape to a wooded horizon, to an enclosed view. This is not a negligible change.
- Vp 5 - PRoW, near Moor Farm (should be High House Farm) This is an important viewpoint where an existing image at the same HFOV as the visualisation would have highlighted the view of the church on the right-hand edge of the image. This view will be seen through the most westerly (and largest) of the sealing end structures. There will be no mitigation of this visual effect after 15 years and a 'tree branch' introduced to the right-hand edge of the image is misleading. It is hoped this 'tree branch' will be omitted in the next set of visualisations.

⁵ Visual Representation of Development Proposals (LI TGN 06/19)

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- Vp 9 - B1121 Aldeburgh Road, south of Friston. The LVIA acknowledges that the mitigation would have no effect on reducing the impact on this viewpoint and this is agreed. However, I consider that the magnitude of change is higher than low-medium due to the incongruity between the current view of the edge of a rural village with its church, and the scale and industrial nature of the substations which will appear in this view to be immediately behind the village. The magnitude of change is at least medium and the effect is **moderate major adverse and permanent**.

14. There is no information on what finished floor levels were used in the visualisations. It is expected that this information will be provided with the Applicant's next set of visualisations.

Construction Period

15. There remains uncertainty over the construction period for the substations. At the minimum it will be four years which is the top limit of 'short term' as defined in the LVIA. Whilst the Applicant has agreed to lay ducting along the route of the cable so that it does not have to be dug up a second time if the two developments are not built concurrently, there has been no agreement to construct both SPR substations concurrently. Nor has there been any indication of when the NG substation would be constructed relatively to the SPR substations. The LVIA should have taken a worse-case scenario which would be at least six years. Consequently, all the construction effects should be described as medium term.

16. Given a potential six year construction period the Yr 15 visualisations in effect represent more than twenty years after the start of construction. If, as local knowledge suggests, the visualisations are very optimistic with regard to the rates of tree growth they represent twenty-five to thirty years after construction commences.

Tree Growth

17. The OLEMS Para 81 states that *'Heights of taller trees (W1, W3, W4) 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, based on relevant guidance (IEMA, 2019), research of relevant published literature (Skinner, 1987) and plant nurseries, and are comparable to precedents established by other NSIP projects.'*
18. I have not been able to find the 2019 IEMA Guidance referred to here but I have found an IEMA article from their publican 'Transform' which was published in 2013 not 2019 which quotes these exact growth rates as a 'rule of thumb'. I do not think this article, written by a landscape architect, is properly described as IEMA Guidance. Much of the article is devoted to stressing the need for *'examining the conditions on site'* and *'examining the growth patterns of nearby vegetation'*. There is no evidence in the LVIA that the site conditions were examined.
19. As the rates quoted are exactly those provided in the IEMA article it is not clear what additional information has been derived from the other sources referred to. However, it should be noted that a literature research carried out in 1987 is likely to be out of date with regard to current and predicted climate. We have seen no plant nursery information from the Applicant to support these growth rates. Instead, we have evidence from Jon Rose, a local Horticultural, Environmental and Landscape Consultant that *'given dry summers, growth rates can often be 50% or less of what is predicted.'*⁶ We also heard similar evidence at the hearing from East Suffolk's experienced landscape and arboricultural officer.

⁶ EN010077-002776-DL1 - SASES - Written Representation Landscape and Visual pdf page 205

Public Amenity

20. The *Outline Onshore Substation Design Principles Statement (APP-585)* outlines various design principles which it is already evident cannot be achieved. In particular the substations have not been '*sensitively placed*' and there is no potential for '*gains for public amenity*'.
21. Rather than achieving gains for public amenity, the severance and loss of more than 700m of Footpath 6 will result in a significant loss of public amenity. The proposed diversion, which will run between the road and the substations, will have a very significantly reduced amenity value compared to that currently afforded by Footpath 6. In addition, the amenity value of all the existing PRoWs north of Friston will be significantly reduced as the current experience of walking in a tranquil rural landscape will have been lost and the character of the landscape will be defined by the dominant presence of the substations and ancillary infrastructure. Even for those sections of footpath which do not have views of the substations, or when walking away from the substations, walkers will be aware of their presence and the current perceptual experience of walking in and through a tranquil landscape will have be diminished significantly.
22. There is a key difference between the impact of the existing pylons and the potential impact of the substations. The pylons are detractors in the landscape, but they allow the existing character to remain due to a large part because the overhead lines are above ground and the footprint of the pylons in any one location is small. As evidenced by the LVIA, a landscape that contains pylons can still be described as having a strong sense of place, local distinctiveness, and a simple, rural character. If the substations are built to the north of Friston they would become the defining characteristic of the landscape and would be the first thing mentioned in any future landscape character assessment.