

# SPR EA1N and EA2 PROJECTS



## DEADLINE 6 - SASES COMMENTS ON ExQs2

Interested Party: SASES

IP Reference Nos. 20024106 and 20024110

Date: 24 February 2021

Issue: 1

ExQs2 Ref.	Topic	SASES Comments
<b>2.0 Overarching, general and cross-topic questions</b>		
2.0.2	Permitted development rights	See SASES post ISH9 submission
2.0.4	Proposed s111 Agreement	<p><b>(a) Adequacy of the proposed package</b></p> <p>The case put to Cabinet of ESC on 5 Jan 2021 for approval was essentially that the Council had negotiated</p> <p><i>“an improvement on what the Applicants had offered at the date of the Cabinet meeting on 7 January 2020, which at that time was not considered sufficient to adequately compensate for the impacts of the projects and overcome the Council’s significant concerns”.</i></p> <p>However no evidence was presented that any assessment had been made of the damage and losses that would be sustained by the various communities and local businesses given the scenarios where one or both projects were to be consented.</p> <p>The sums appear to have been arbitrarily agreed and there does not seem to be any formula or valuation metric by which these amounts have been determined. No justification in terms of the quantum has been provided in the ESC cabinet paper. The sums are small (i) relative to the environmental and local damage which will be inflicted and the period over which that damage will be</p>

		<p>suffered, (ii) relative to the capital investment in these projects and (iii) relative to the value which Scottish Power will create from such investment; the very giving of DCO consent will substantially increase the realisable value of the two projects.</p> <p>There could be a number of approaches to valuation.</p> <p>If for example the area of landfall, the cable route and the area surrounding the Friston site was regarded as a financial asset, what is the diminution in the asset value both during construction and during operation given loss of tranquillity and amenity, landscape damage, heritage damage, ecological damage etc? That might be a basis for assessing the level of compensation offered.</p> <p>Significant damage to the tourism economy cannot be ruled out given the deficiencies in the Applicants' analysis and the work carried out by the DMO. A variety of scenarios could be developed to assess the net present value of that loss of income plus of course the reduction in employment and consequential financial effects. Those scenarios could include a minor, moderate and major adverse effects which would provide some sort of framework to judge the financial mitigation on offer.</p> <p>Analysis could be conducted as a result of the loss of farming income as a result of the loss of agricultural land. Again some sort of net present value calculation could be conducted.</p> <p>In addition perhaps some sort of financial analysis can be assessed by reference to the loss of well-being in the villages and communities negatively impacted.</p> <p>.</p> <p><b>(b) Additional measures</b></p> <p>This is difficult as money cannot be adequate compensation for the environmental damage and damage to wellbeing. Perhaps a better approach would be to recognise that the impacts cannot be mitigated and the village and its surrounding area cease to be places where the current population wishes to live.</p> <p><b>(c) Arrangements for distribution</b></p>
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2.0.7 (a) a. and b.	Substation Design Principles Statement	<p>SASES view is that the current SDPS does <u>not</u> provide sufficient information to allow a judgement to be made on the proposals with regard to the following matters</p> <p>a. <u>Sustainability</u>. The current proposals are not sensitive to place (they seriously threaten the physical, social, economic and cultural fabric of Friston and the wider locality), they do not make efficient use of natural resources such as land (the Applicants are understood to already own unallocated land suitable for substations adjacent to Bramford NGET substation, and the land area currently sought at Friston appears to be in considerably in excess of the minimum actually required for the projects), and no adequate information is provided as to the aesthetics of the proposed structures.</p> <p>b. <u>Sustainability</u>. Generally accepted Principles of Sustainable Development (e.g. NPPF Section 2) refer to <i>'meeting the needs of the present without compromising the ability of future generations to meet their own needs'</i>. But concreting over BMV land when other land of lower value is available does not seem to meet this requirement. The NPPF also refers to the objectives of <i>'land of the right types (is) available in the right places'</i> and <i>'coordinating the provision of infrastructure'</i> neither of which criteria appear to be achieved by the proposed projects given availability of the alternative Bramford site. Further, with regard to flooding the Sequential Test appears not to have been applied to site selection for the NGET substation (it is proposed for an area of known Zone 3 pluvial flood risk when sites of lower flood risk exist) and there are serious concerns with regard to the overall adequacy of the proposed flood remediation measures for the project (as expressed in detail by SCC, SASES and others). And the current substation proposals cannot possibly be described as 'attractive'.</p>
2.0.7 (b)	Substation Design Principles Statement	<p>SASES view is that insufficient detailed work has been undertaken on the design of any of the substations and related infrastructure, especially the NG substation and cable sealing ends, and that it would not adequately protect the interests of the community to allow all this work to be post-consent. A</p>

		secured commitment to <u>independent</u> power engineering (as well as aesthetic e.g. Design Council) design oversight of the substation design, with a secured commitment to a revised OLMP and secured release of any land subsequently found not to be essential might be considered partial mitigation for the current situation.
2.0.7 (c)	Substation Design Principles Statement	SASES proposal that independent power engineering oversight be provided for the projects could mitigate any skills gap of a Design Champion. Such expertise might be on recommendation of the Royal Academy of Engineering or the Institution of Engineering & Technology, or sourced from one of the several UK-based Engineering consultancies of international repute in Power Engineering.
2.0.12	Design Evolution	<p>SASES is concerned that the current proposals are still overly conceptual and seem very dependent on supply chain guidance, suggesting insufficient detailed design work has been completed to date. SASES acknowledges that that the Applicants have successfully implemented a 700MW substation at Bramford for EA1 but the proposed subsequent projects should be an opportunity for significant design improvement and refinement rather than duplication, especially given the vastly greater sensitivity of the Friston site compared with the Bramford site. Evidence of a clearly executed design process with only limited (and documented) issues outstanding would be a starting point for addressing this concern.</p> <p>With reference to the National Grid substation no design evolution seems to have occurred as it has stated that <i>“the design parameters for the sub-station have been provided to the Promoter by NGET. These are standard size requirements for the sub-station required to connect EA1N and EA2 projects.”</i> See letter from Brian Cave Leighton Paisner to Mr Paul Chandler dated 24 November 2020 submitted by SASES at Deadline 3 <a href="#">REP3-127</a>. There is no evidence of any design evolution in respect of the cable sealing ends Although these presumably have “standard size requirements”.</p>
2.0.13	Cumulative Effects Assessment at the substations site	SASES during the course of the examinations has provided written representations and submissions in relation to a wide variety of impacts and as part of those representations and submissions has commented upon the mitigation offered. In terms of compensation funds these are regarded as inadequate not least for the reasons set out in relation to ExQ 2.0.4. In terms of mitigation this is either inadequate or is still at this late stage of examination insufficiently assessed or defined. The proposals made by the Applicants (but not National Grid) to reduce the height and footprint of the Scottish Power substations whilst welcomed do not materially reduce the landscape, heritage or other impacts of putting such a large piece of industrial infrastructure in a deeply rural landscape next to a village on a

		<p>site which is surrounded by listed buildings and which has an existing flood risk. The economic benefits locally, particularly long-term, are non-existent and this has to be set against the risk of substantial damage to the local tourism economy. The DCO process to date, followed, if the DCOs are granted, by a disruptive, lengthy and uncertain construction period will for some people be a blight on their remaining active years. The community life of Friston will be irrevocably damaged for the long term.</p> <p>SASES refers back to its Written Representation - Introduction &amp; Summary which summarises all the adverse impacts <a href="#">REP1-341</a> which in substance have remained unchanged.</p> <p>Any one of the impacts on its own could be regarded as unacceptable but when accumulated can only be regarded as causing unacceptable damage to the environment, the local economy and the community.</p>
<p><b>2.10 Landscape and Visual Impact</b></p>		
<p>2.10.1</p>	<p>Outline landscape and ecological management strategy (OLEMS)</p>	<p>The emphasis in the <b>National Design Principles</b> is that potential landscape impacts of NSIPs should be minimised through careful design which begins with siting. SASES consider that the Applicants have not demonstrated that when choosing the site at Friston they had adequately understood the landscape (including historic landscape) sensitivities of the area. Consequently, the OLMP is not able to adequately mitigate the harm to the landscape which remains substantial.</p> <p>Paragraph 64 claims that these National Policy principles will be achieved via planting proposal which will contribute to <i>'to the enhancement of the local landscape character.'</i> However, the LVIA accepts that even after 15 years the landscape effects on the area to north of Friston will be <i>'Significant, long-term and permanent.'</i> There will be no enhancement of the local landscape character. The OLEM does not enable the scheme to meet national policy objectives to minimise landscape impacts.</p> <p>With regard to <b>Local Design Principles</b> the Suffolk Landscape Character Assessment also notes that <i>'The right choice of siting, form, orientation and colour'</i> can make a considerable contribution to mitigating impact.</p> <p>Key issues within the Suffolk Coastal Local Plan which are not met by the development are the delivery of high quality design that respects local character and is locally distinctive. The historic footpath from Friston to the north (FP 6) will be lost as a PRoW and obliterated as a feature on the ground. This does not meet the policy objectives that development should demonstrate an <i>'understanding of the key</i></p>

		<p><i>features of local character</i> and does not <i>enhance these features through innovative and creative means.</i></p> <p>Local Policy objectives that the overall scale and character of the development is well related to the surroundings are not met.</p> <p>Within Section 3.4 of the OLEMS, with regard to consultation, paragraph 72 lists <i>reducing the landtake of the NGET substation</i> as one of the means of mitigating the impacts of the development. However there appears to have been no evident effort to reduce the land take. For example, the desire of the Applicants to maintaining the flexibility of choosing either a GIS or AIS system according to which is beneficial to the Applicants rather than identifying which has the least landscape and visual impact.</p> <p>Paragraph 76 lists a number of comments which <i>were provided by the OLMP technical working group and LVIA ETG during consultations.</i> The status of these <i>comments</i> is unclear. For example, they include <i>The levels across the site need to be fully understood in order to understand the effectiveness of planting proposals as screening.</i> It has become clear in the course of the examination that the Applicants do not fully understand the levels across the site and are not expecting to understand them until post consent.</p>
2.10.3	Access road	<p>The use of grasscrete is an interesting suggestion, and further the road should be reduced in width to that of a single light commercial vehicle of the type used to carry out maintenance, the proposed purpose of this road, save for the delivery of 4 AILs. The road would only need to be temporarily widened for the AIL deliveries. Minimising the width of this road would reduce the land take, have some effect on surface water flood risk and landscape damage. The size of the entrance to this road from the B1121 could also be reduced. It would also assist in preventing its use as a construction access for expansion of the National Grid infrastructure for subsequent projects.</p>
2.10.7	Proposed sealing end compounds	<p>Vp 5 is representative of views from the PRow but it is also located close to the listed Friston Moor Farmhouse and within its agricultural setting.</p> <p>Visible from Vp 5 is the highest item of equipment within the cable sealing end compounds, the overhead line gantry at 16m above finished ground level.(ES Project description paragraph 517). There has been no reduction in this height. There is no mention of the sealing end overhead line gantry in</p>

	<p>Table 4.2 of the Onshore Substations Update Clarification Note (REP3-057). It is now the highest piece of equipment within all the substations excepting the lightning protection masts (20m) which are slender structures in comparison. It would be helpful if all the heights of all the pieces of equipment and the AOD heights could be listed in the Substations Design Principles Statement lists showing where reductions have been made. See also SASSES' post ISH9 submission in respect of Requirement 12.</p> <p>The sealing end with circuit breaker compound is about 250m from Vp 5. The two other sealing end compounds are both within 500m. The additional pylon is also located close to the sealing end with circuit breaker compound and within approximately 250m of Vp 5. The relocated pylon is located closer to the Vp 5 than the existing pylons. Behind these substantial structures, equipment within the National Grid substation and the western substation is visible. The range, the scale and the extent of the equipment is evident due to its proximity to Vp 5. It is made more evident in the photomontage because there is a comparison with the mitigation planting. Even shown at the highly optimistic heights used by the Appellants' it is dwarfed by the scale and height of the equipment. This is how the equipment will appear in reality. It will dwarf the human scale features and characteristics of the landscape.</p> <p>It is very noticeable when comparing the existing images with the photomontages how the pylons have become more dominant from this location. This is partly due to the fact that they are now closer to Vp; 5 but also because they are now viewed within an industrial complex. Previously they were located within a rural agricultural landscape which could be seen to flow beneath them. From this viewpoint 5 pylons are now seen set within and connected by a substation landscape.</p> <p>The additional planting is not successful in providing additional screening but there are no further measures that could be taken to more adequately screen the sealing end compounds without causing other harm. Elsewhere within the scheme views of this scale have been 'mitigated' by woodland planting that has obscured views by enclosing the viewpoint (e.g. Vp 1). SASSES has always argued that this has its own adverse impacts and does not reduce the impact to negligible, as claimed by the Applicants. This is because the existing views, which are open, characteristic and allow an appreciation of the landscape setting of Friston, will be lost entirely if the planting is as successful as the Applicants' claim. A similar approach has not been adopted at Vp 5 because it is recognised that enclosing the historic farmhouses in woodland would result in a loss of their agricultural setting. In this location it is recognised, and SASSES would agree, that mitigation planting would have adverse impacts that would outweigh the benefits of screening.</p>
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2.10.9	Landscaping growth rates	<p>SASES refers to the report it submitted at the Deadline 1 prepared by Jon Rose and Associates (an expert with many years of “hands on” experience in the local area) dated 27 October 2020 <a href="#">REP1-365</a>. The following is an extract from the report.</p> <p><i>“The expected growth rates of 30cm per year for the first five years followed by 50cm per year for the ten years following is in my opinion optimistic given the present dry summers experienced in Suffolk. I would say that <b><u>these growth rates are only possible given a nursery situation of intensive irrigation and care</u></b>. I question whether in reality, bearing in mind the size and area of planting, that an embedded best practice maintenance regime, to the high level required, would take place to achieve such excellent predicted growth rates. This would necessitate the installation and continuous use of an extensive irrigation system together with mulching to retain moisture. This is as well as weed and herbage control to maintain weed free areas around the plants. Without this I would anticipate much less than ‘the assumed growth rates’. Given the latest predisposed weather conditions of very dry Springs with little if any rain during the critical establishment period and given the types of soils in the area; high losses could be expected. I have seen losses up to 70% - 85% in nearby locations, necessitating a replanting program.” [emphasis added]</i></p> <p><i>“I have extensive experience of large-scale planting in this geographical area. Observation of schemes locally show poor or minimal growth rates using cell grown stock with inadequate maintenance regimes. As an example, I have seen only 1.2m achieved after 5 years.”</i></p> <p><i>“I advise assuming Year 1 to be the establishment year where growth can often be as little as 10 cm on some species. The following and successive years and given dry summers, growth rates can often be 50% or less of what is predicted.”</i></p>
2.10.10	Landscaping replacement of failed planting	As SASES has stated in its comments on the draft DCO the maintenance of planting should continue for so long as the substation complex remains in the landscape. All woodland requires continuous maintenance/management.
2.10.12	Landscaping and visual impacts	As noted in relation to 2.10.7 it will be helpful if the heights (including AOD) of each of the elements within the substations and cable sealing ends could be specified.

2.10.15	Substations lighting at night	<p><b>(a)</b></p> <p>SASES has previously expressed a concern that the operational artificial light emissions management plan should be agreed as part of the design of the substations and cable sealing ends. It seems out of sequence to agree a light emissions management plan for works numbers 30, 41 and 38 <u>after</u> the lighting system has been designed and constructed. It needs to be clarified the other than works numbers 30, 41 and 38, no other part of the authorised development onshore will require any exterior lighting.</p> <p>The Applicants' responses to hearing action points in relation to ISH4 (number 8) raise a number of concerns. The Applicants use words such as "normally" in terms of lighting during hours of darkness. What does "normally" mean? There is already an exception in respect of repair/maintenance. The Applicants also refer to lighting being "manually controlled". Does that mean that lighting will "normally" be switched off at night?</p> <p>It refers to car park lighting possibly being motion sensitive. As no one works at the substation site presumably there will be very limited parking. Why does there need to be any motion controlled lighting? The risk at Friston is that wildlife will trigger the lighting.</p> <p>There are differences between the Applicants' substations' lighting and the National Grid infrastructure. In particular the National Grid substation refers to perimeter lighting not being left on inadvertently during the day. The issue here is the lighting not being left on inadvertently during hours of darkness.</p> <p>It might help if there is a simple outline lighting management plan to clarify these issues.</p> <p><b>(b)</b></p> <p>This question directly links to issues around the extent of working hours. During autumn, winter and spring, 7 am to 7 pm working hours will require lighting either at the beginning or the end of the day or both depending upon the exact time of year. It is another reason why 24 hour working should be minimised. The extent of the resulting light pollution can be reduced by reducing working hours. It also highlights the longer terms impacts which will arise if the projects are built sequentially rather than concurrently.</p>
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