

## SPR EA1N and EA2 PROJECTS



### DEADLINE 7 - SASES COMMENTS ON APPLICANTS RESPONSES TO ExQs2

Interested Party: SASES

IP Reference Nos. 20024106 and 20024110

Date: 4 March 2021

Issue: 1

ExQs2 Ref.	Topic	SASES Comments
<b>2.0 Overarching, general and cross-topic questions</b>		
2.0.1	Permitted development rights	See separate Submission in respect of Operational Land submitted at Deadline 7.
2.0.7 – 2.0.12	Substation Design Principles Statement (SDPS) [REP4-029] & Design Evolution	<p>a) SASES reiterates its concern that the Applicants have entered the Examination process appearing to have undertaken only very basic design work on the substations themselves. This comment is made taking as a comparison the ES material for other wind farm projects such as Triton Knoll, Rampion, Hornsea One etc. where detailed plans and elevations and/or 3D visualisations have been provided including details of materials and finishes. The Applicants proposal to provide further and possibly still incomplete information as late as Deadline 8 is not, in SASES view, acceptable.</p> <p>b) The Applicants' statement under 'Onshore Substation' taken from [APP-052] Section 4.4.2 that "<i>Gas Insulated Switchgear (GIS) transformer technology ~ allows for a lower building height</i>" is fundamentally wrong. GIS technology normally requires a <u>greater</u> building height but offers a lower ground footprint. There is, of course, the further issue that it requires use of SF6 which is an extremely potent greenhouse gas, which NGET are committed to phasing out, as they explained at CAH2.</p>
<b>2.8 Historic environment [Dr Richard Hoggett]</b>		
2.8.2	High House Farm	We welcome the observations made by the ExA in their Question 2.8.2 that viewpoints CHVP3 and VP5 do not represent the view southwards from within the curtilage of High House Farm and that long

		<p>views are to be appreciated across the open farmland towards the church. Of course, this view is reversed from the church.</p> <p>In their response, the Applicants acknowledge that the curtilage of High House Farm is understood to be cluster of former agricultural buildings, which includes Moor Farm and Friston Barn and their gardens. This represents a much larger and more significant reading of the heritage asset than has previously been acknowledged, with previous assessments focussing on individual buildings rather than the former farm complex as a whole.</p> <p>The submitted visualisations, such as they are, do not support the Applicants' assertion that the construction of the substations and sealing end compounds, the latter being situated between 230m and 275m away, will not sever the connection between High House Farm and the church. We have consistently stated that it will, and this conclusion has been reached by other parties with heritage interests.</p> <p>Furthermore, the Applicants' acceptance of the fact that the proposed mitigation planting adjacent to High House Farm will indeed sever the views of the church is a clear indication that the mitigation scheme in itself will also have a detrimental impact upon heritage assets, in addition to the substations and infrastructure themselves. Again, this has been consistently identified by us and other parties as a material concern, in that the proposed mitigation scheme is at best ineffective and at worst harmful.</p> <p>As has been rehearsed in writing and orally, we do not accept the Applicants' position that the views and long-range connection between High House Farm and the church do not add to the significance of either of these heritage assets. On the contrary, the survival of the survival of the complex interrelationship between the heritage assets to the north of Friston is a strong element of the historic landscape character of the proposed development area.</p> <p>The significant change in landscape character proposed to the south of the High House Farm will have a detrimental impact, the scale of which we consider the Applicants has underestimated in their own assessment.</p>
2.8.3	Friston House	<p>We welcome the indication from the ExA's question that the curtilage and boundary of Friston House lie to the east of the woodland within the grounds and that there are areas of open ground to the north of the house which afford direct views of the proposed development sites. We have consistently</p>

		<p>highlighted the shortcomings of the submitted visualisations pertaining to Friston House, together with the assertion that the grounds are secluded, private and disconnected from the surrounding landscape.</p> <p>We welcome the fact that the Applicants now acknowledge that the open ground to the north forms part of the setting of Friston House and that this has the potential to be impacted upon by the proposed development area. However, we disagree with the Applicants' conclusion that this ground does not contribute towards the significance of the house itself. We would argue that, as an element of the wider designed landscape which has grown up around the house, it does make a contribution to the significance of the heritage asset.</p> <p>Again, we welcome the Applicants' acknowledgement that there would be change in the setting to the north of Friston House, a position which has not previously been recognised or articulated, and one which is at odds with the approach taken to the assessment of the heritage asset in the submitted heritage impact assessments. We would, however, contest the conclusion that the changes to the setting would not result in a negative impact on the setting Friston House.</p>
2.8.4	Woodside Farm	<p>Again, we welcome the ExA's observation that the submitted viewpoint CHVP5 does not illustrate the effect of the proposed development and the proposed mitigation planting on the setting of the farm, as viewed from the rear of this heritage asset. We have consistently stated that the selection of a viewpoint to the west of the building gives an unrepresentative impression of the impact of the development. As the Applicants states, the selection of this view 'the building partially screens both the proposed substations and mitigation planting from view.' We acknowledge the Applicants' offer to produce additional photomontages from this location, which, as they state will give 'an uninterrupted view towards the substations' and look forward to viewing the results.</p> <p>We have consistently stated that the change of character of the setting of the heritage asset, together with the strong visual impact, which will be brought about by the proposed development will have a higher degree adverse impact upon the heritage asset than the Applicants concludes. We remain unconvinced that the proposed landscape mitigation will have any effect here.</p>
2.8.5	Little Moor Farm	<p>We welcome the ExA's observations that the submitted CHVP4 shows that large sections of the proposed National Grid substation will still be visible from this heritage asset, even after 15 years' growth of the mitigation planting, and we would re-state our view that the adverse impact of proposed development will not be mitigated by the proposed planting. This is primarily because the heritage harm caused by the proposal pertains to the significant change in landscape character brought about</p>

		<p>by the proposals and the severance of the historic connections between the northern group of heritage assets and the church to the south, the latter being exacerbated by the introduction of additional screening by way of mitigation. As has been expressed in writing and orally, we disagree with the Applicants' assessment that the church will be impacted upon by this loss of visual connection, but that Little Moor Farm will not.</p>
2.8.6	Church of St Mary	<p>We welcome the ExA's recognition of the current tranquillity of the church and churchyard, and are pleased that the visual and spatial relationship between the exterior <u>and interior</u> of the church and the proposed development sites have been appreciated. We continue to contest the Applicants' statement that the proposed development will have no effect upon the tranquillity of the site, and dispute their assessment of the visual and aural intrusion of the proposed development. In their written responses, the Applicants acknowledge that the elements of the substations will be 'more or less visible in views north from the churchyard', which appears to be a weakening of previous statements on the subject.</p> <p>Similarly, we and other bodies with heritage expertise, including Historic England, East Suffolk Council and the Suffolk Preservation Society, continue to identify the significant change of landscape character to the north of the church and the severance of the historical relationship between the church and the farmsteads to the north will have a significant detrimental effect upon the significance of the church.</p> <p>We would agree with the Applicants that selected viewpoints only give a partial impression of the likely effects of the development, although we have set out previously our arguments as to how more representative viewpoints might have been selected, and would agree that a site visit enables a better understanding. We are sure that the ExA will have formed its own opinion on these matters during its visits.</p> <p>This is also the first time which the Applicants has set out in more detail the nature and proximity of the construction works which are proposed for the immediate environs of the church, which would also have an impact upon the setting of the heritage asset. As we have set out previously, we consider the lack of a detailed assessment of the impacts of the prolonged construction phase on all of the affected heritage assets to be a significant omission on the part of the Applicants.</p>
<b>2.17 Socio-economic effects</b>		
2.17.1	Socio-economic benefits	<b><u>Geography</u></b>

		<p>This response demonstrates the confusion which the Applicants have created by using incorrect or multiple definitions of local, regional and UK.</p> <p>The definition of “local” is not local, it includes for example Great Yarmouth which is 40 miles by road from the substation site and over an hour away by car.</p> <p>Three definitions of regional are used.</p> <p>Two definitions of UK are used.</p> <p><b><u>Contracts</u></b></p> <p>The Applicants have referred to the number of organisations and purchase orders with no indication of the size of organisation or value of purchase orders or the extent to which the work is actually conducted locally/regionally. Further it refers to these being “<i>awarded across the East Coast</i>” but is unclear as to the definition unless it means the east coast of the UK which is referred to in the last paragraph of under the heading of Geography when it states this is “<i>a useful national and international reference</i>”</p> <p>It is very difficult to assess local and regional benefits when such confusion has been created together with a lack of hard financial data. Such data can be aggregated so there is no risk of commercial confidential information being disclosed.</p> <p><b><u>Deprivation Geography</u></b></p> <p>It is well understood that there is substantial deprivation in Lowestoft. This is why SASES has focused on the extremely limited benefits - see below - which the Scottish Power windfarm projects are providing to the people of Lowestoft and the lack of ambition which is being shown in addressing this deprivation, particularly relative to overall project investment,</p> <p><b><u>Levelling Up</u></b></p> <p>Scottish Power in respect of Lowestoft refers to two numbers, £25m invested in the outer harbour and the creation of 100 jobs. Whilst any investment and job creation are welcomed the £25 million</p>
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2.17.2	Local demographics	<p>This response demonstrates the Applicants have not begun to engage seriously with this risk to the local economy. SASES refers to its comments on the possible duration of the construction period plus the current application period and the future pre construction period all of which have acted and will continue to act as a serious deterrent effect on people seeking to move to the local area and a strong incentive for people (who can afford to) to leave.</p>
2.17.3	Construction	<p>a) The Applicants refer to the years of 2028 (as the peak) and 2026 for completion for both projects. Given each DCO has a period of five years from consent and given the estimated construction periods which may or may not be sequential, to state that onshore construction for both projects is planned to be completed by 2026 stretches credibility.</p> <p>b) As was evident at ISH5 the Applicants have not carried out any assessment of the impact on the local tourism economy.</p>
2.17.6		<p>b) As indicated elsewhere in these comments the construction period (Including onshore preparation work such as site clearance) could last for a period of 10 years. In substance this is not "temporary".</p> <p>The Applicants assert there is <i>"no pathway for a visitor to, for example, Southwold or Dunwich to be affected by these impacts"</i>. The Applicants cite no evidence for this assertion. Furthermore there is no reference to Thorpeness, Aldeburgh, Snape Maltings, the surrounding villages, Orford, the use of the footpath or cycle route network or any recognition that visitors travel both through and around the</p>

		<p>AONB by car, bicycle or on foot to enjoy the amenity and facilities which it currently offers both within and outside the AONB. There is no recognition that visitors who come to enjoy the area do not restrict themselves to the area within the boundary of the AONB and many will stay in locations which are technically outside of the AONB.</p> <p>As is evidenced SASES' submissions on traffic and transport there is a great deal of concern about increased congestion, increased pollution, road safety, rat running on rural lanes. All of this will impact tranquillity to visitors as they travel around the area.</p> <p>In terms of the offshore elements it should be remembered that many if not most residents recognise and support the need for and benefits of offshore wind, despite the impact on seascapes. That is why so few representations have been received on that impact relative to the onshore environmental damage.</p>
2.17.9	SEAS representations	<p>The last paragraph of the Applicants' response indicates yet again the Applicants' mistaken view that somehow the onshore elements of EA1 including the substation site and the landfall are comparable to the Friston site. See SASES Post Hearing Submission (ISH5) submitted at Deadline 5.</p> <p><a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-003768-DL5%20-%20SASES%20-%20Post%20ISH5.pdf">https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-003768-DL5%20-%20SASES%20-%20Post%20ISH5.pdf</a></p>
<b>2.18 Transportation and Traffic</b>		
2.18.14		<p>a) A possible reason for the Applicants wishing to avoid using the Yoxford route is because of Sizewell C traffic.</p> <p>b) As per previous submissions a signal scheme at Friday Street poses a risk of congestion and moving road safety issues elsewhere particularly onto the rural lane network between the A12 and Snape and the Snape crossroads. No doubt this is why the local highways authority have not brought forward such a scheme in the past.</p>

		The Applicants points out that sending all HGV to the site via the Yoxford-Theberton section of the B1122 would result in extra traffic through those villages, but the argument that this would result in increased traffic through Leiston, Knodishall and Coldfair Green is flawed, as these can be by-passed by the haul road if the route along Lovers Lane is taken to the North of Leiston.
2.18.15		SASES notes that the Applicants is proposing a signal controlled crossing on the B1353 (crossing 3/4) but not at Grove Road, crossing 11/12). Why is this?