

Deadline 9 submission

My reference:

EA1N 20023282

EA2 20023287

Dear Mr Smith and Colleagues

In this submission I will be commenting firstly on SPR's response at Deadline 8 to submissions I made a Deadline 7( " Applicants' Comments on Fiona Cramb's Deadline 7 Submission Applicant: East Anglia TWO and East Anglia ONE North Limited Document Reference: ExA.AS-24.D8.V1 SPR Reference: EA1N\_EA2-DWF-ENV-REP-IBR-001023") and secondly on issues raised in other submissions made at Deadline 8.

Generally, I adopt and endorse the submissions of SASES and SEAS and I do not repeat submissions I have made previously.

## **Introduction**

1. In its submission SPR simply repeat its predetermined position that the impact on High House Farm is negligible.
2. SPRs assessment is wholly unreal. This vast proposed site will share a boundary with the garden of High House Farm and that boundary is about 20 metres from the house itself. The construction site and the development will sever High House Farm from Friston Village.
3. The impact of the construction will, without a question, be devastating. Setting to one side SPRs dissembling over cumulative impact, the duration of successive rounds of construction could run into decades. And once constructed this ever-increasing hub will destroy Friston the village, and the connection of High House Farm to it forever. In relation to the view from the southern edge of the garden the applicants persist in their unsubstantiated assertion that the construction of the proposed substations and sealing end compounds would not obstruct view of the church. SPR says that it is the proposed screening that would obstruct a view of the church. This is absurd as anyone who had stood in the garden at the relevant points would know. It is the development that will obscure the view, not the mitigation.

## Heritage Assessment

4. The approach adopted by SPR is simply to repeat self-serving and predetermined assertions and refuse to engage with the ever-growing body of evidence.
5. It persists with its assessment that the impact of the developments on the Heritage importance of High House Farm would be in terms of the magnitude of impact be low adverse and in the significance of effect be minor.
6. No one else agrees with SPR.
7. ██████████, in his report for SASES assesses the magnitude of impact on the heritage value of High House Farm as medium and the significance of effect as moderate. He considers that SPR has deliberately underestimated the heritage value of the seven heritage assets effected by the proposed development both individually and collectively:

*“High House Farm is a relatively open site and the complex of buildings of which the listed farmhouse forms a part is highly visible from numerous locations in the surrounding landscape, with particularly long views from the south and south-east, across the proposed development site towards the church (Figure 6). These views will be blocked as a result of the proposed development and the historical connection between the farmsteads and the church and settlement to the south will be severed.”*

*“Although each of the heritage assets is assessed singly, it should be stressed that these heritage assets do not exist in isolation and are all parts of a significant area of historic landscape which lies to the north of the village of Friston.”*

8. He identifies the numerous failings on the part of SPR to conduct proper assessments. He describes the assessments that have been carried out as beset with “*significant shortcomings*” and “*incomplete.*” He criticises the claim made by SPR that it would conduct these assessments post consent. This is a “*major shortcoming*”.
9. ██████████ also points out in his Executive Summary that SPRs analysis ignores completely the construction phase describing it as a “*significant omission*”:

*“The exclusion of the of the construction phase from the heritage impact assessment is particularly concerning, for 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.”*

10. ██████████ then says that SPR’s assertions:

*“... underestimate the heritage impact of the proposed EAIN and EA2 schemes and undervalue the contribution made by setting to each of these designated heritage assets, resulting in much lower assessments of the adverse heritage impact on each of these individual listed buildings than might otherwise be concluded. In particular, the submitted illustrative viewpoints selected and photomontage visualisations are highly selective and do not include key views, such as that from the tower of Friston church, which would enable a better visual impression of the likely impact of the scheme to be presented.*”

11. [REDACTED] says that the harmful effects on local heritage assets must be weighed in the overall balance:

*“Under existing planning law and policy it is required that these adverse impacts be weighed against the wider benefits of the application and that the greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval. Any decision taken will also require that the desirability of preserving the settings of listed buildings should be given 'considerable importance and weight' when the decision-maker carries out the balancing exercise (Barnwell Manor Wind Energy Ltd v East Northants DC, English Heritage, National Trust and SSCLG [2014] EWCA Civ 137, Para. 24).”*

12. In its response at Deadline 8 SPR in relation to the view to Friston church from the garden of High House Farm which the Inspectors described as: *“At the ExA site visit it was clear that the garden of HHF provided clear views across a largely open landscape to the church of St Mary Friston”*, SPR say that:

*“... the Applicants do not consider that the view of the church from the garden makes a substantive contribution to the significance of High House Farm and therefore the severance of the view would not materially affect the significance of this Listed Building.*”

13. East Suffolk Council also disagrees with SPR’s analysis. In its Deadline 5 Submission it says of High House Farm.: *“We remain of the view that the magnitude of adverse impact would be medium, giving rise to an effect of moderate significance”*

14. Historical England also disagrees. It continues to object to the on shore elements of the projects upon the basis that the developments would harm the historic environment:

At Deadline 5:

*“Historic England conclusion and Position As set out in our previous letter we conclude that the development of the sub-stations both individually and in*

*conjunction with each other and with the NGET sub-station would result in harm to the historic environment. This is harm to the significance of a number of designated heritage assets from development within their setting. Our primary concern is still the grade II\* listed church of St Mary's, Friston, and because of the important relationship of the development area to the church and the erosion of its rural setting. We have concluded and continue to be of the view that this would be a high degree of less than substantial harm. Although we welcome the changes Historic England do not consider this is sufficient to alter our overall position and we maintain our in principle objection to the sub-station elements of both developments and the NGET infrastructure. This would be a high degree of less than substantial harm."*

At Deadline 6:

*"The changes made in this OLEMs plan, retention of existing woodland and changes to the screen the development from the north in particular are welcomed, however these are relatively small changes to the overall scheme and do not affect our overall fundamental objection. This is particularly apparent in those key views of the Church from Moor Farm, where the development would cut across the footpath which runs from Friston to Moor Farm to the north of the church. The use of planting to here to screen the development would have the effect of screening out the substation in the immediate foreground but, because it would continue to block and restrict the key views of the church and remove those views its remains harmful. Both the scheme and the mitigation are harmful, and because one seeks to soften or reduce the dominance of the other does not necessarily reduce the overall effect of harm. Again because it is natural it is not necessarily appropriate in relation to the setting of an historic asset. Retention of existing planting is likely to increase the screening again in some areas however the overall reduction of impacts is relative modest overall, and would in our view be negligible in relation to reducing the overall effects of the scheme on the significance of the church. Again we feel it is also worth stating that we maintain a concerns as to whether the planting would be effective in its job of mitigating the impact of the development on the significance of the church, this is due to the concerns raised by council and other in relation to growth rates. If the OLEMS proposal is not effective, and would not end up screening the development then the overall harm would be exacerbated for longer and would be more damaging. We are aware the developer have sought measures to increase the success of the planting, and we are aware this is not our area of expertise, however the failure of the scheme or the failure to achieve the projected growth rates would result in an increased level of harm to the historic environment."*

15. Finally, a point of detail. The Applicant is mistaken in asserting that the gardens of both High House Farm and Fristonmoor Barn as being within the curtilage of the listed building. These are two entirely separate properties.

## **Residential Amenity**

16. SPR say in its response that it has not taken into account “residential amenity” of High House Farm. They say that this is not relevant to heritage impact and then use that as an excuse to ignore the consideration altogether.
17. SPR says that it has always been recognized that the ceiling end compounds and repositioned pylons would be closer to High House Farm. But they now claim that any adverse impact on the significance of High House Farm would be caused by the overall change in the character of the surrounding landscape not the “*precise distance between the listed buildings and specific elements of the projects*”
18. As set out in the introduction the amenity impact on residents of High House Farm will be utterly devastating. SPR conveniently forgets that it has drawn the very boundary of the site at the garden fence of High House Farm with major industrial structures being located just over 200 meters away.

## **Cumulative impact**

19. SPR was asked about the possibility of other grid connections being made at Friston in EXQs on 12<sup>th</sup> October 2020. It was to provide a response by 2<sup>nd</sup> November 2020. SPR declined to offer any evidence.
20. SPR was asked again about this matter again in ExQ’s on the 12<sup>th</sup> February 2021 and asked to respond by Deadline 6. Yet again SPR declined to provide any information and insisted that there was no need to look to Eurolink or Nautilus.
21. It has been the consistent tactical position of SPR throughout to block any attempt to address cumulative impact.
22. SPR finally came clean at deadline 8 admitting that there were in fact other connected projects in the offing, a fact that it has self-evidently known about for a long time. Yet even now it only offers scant evidence in relation to Eurolink and Nautilus and only in relation to the extension of the NGET substation that would be required.
23. SPR is now forced, despite past denials, to admit that these projects will have an impact. The truth of the matter is that SPR’s approach throughout to cumulative impact has been to dissemble and obfuscate. Even now its disclosure of relevant material is desultory. It has not concluded any proper CIA evaluation. It has not disclosed any relevant internal evidence to substantiate its assertions.
24. In any event the evidence submitted is deeply unsatisfactory. For example, in relation to North Falls and Five Estuaries SPR now says that these will not connect at Friston. In the CIA documents they say they rely on publicly available information. However, so far as relevant publicly available information is concerned both the relevant

websites contradict SPR's position. They say that the no decision has been taken about connection points. So Friston therefore remains a distinct possibility.

25. In the document submitted at Deadline 8 "Extension of National Grid Substation Appraisal Applicants: East Anglia ONE North Limited and East Anglia TWO Limited Document Reference: ExA.AS-32.D8.V1 SPR Reference: EA1N\_EA2-DWF-ENV-REP-IBR-001029", under the potential impact of extension of the NGET substation, SPR has now been forced to concede that there will be a real and significant impact at the very least on shore ecology, on shore ornithology, archeology and cultural heritage and landscape.

26. On archaeology and cultural heritage SPR says:

*"The National Grid substation extensions would enlarge the footprint of the National Grid substation, potentially increasing the level of visual change in the setting of adjacent heritage assets. This could result in additional harm to the significance of these assets."*

27. On landscape SPR says:

*"The National Grid substation extensions would enlarge the footprint of the National Grid substation. There is potential for additional direct physical landscape effects; an intensification of significant effects on local landscape character; and an increase in the lateral spread and influence of the National Grid substation in views from the surrounding area.*

*"*

28. The Authority should take the position that SPR has fully had its say. It has set out its definitive position. The Authority should conclude that SPRs analysis is partial and inadequate and that it has simply failed to satisfy the Authority on cumulative impact.

29. The effect of this is that SPRs analysis of the impact upon High House Farm is also flawed. It has failed to take into account the cumulative impact of further successive developments on heritage and residential amenity.

### **Extension of the Examination**

30. Finally, I strongly support the objections made by all the affected groups including SEAS and SASES to the extension of this inquiry, which has been shown to me. The extension decision came as a bolt from the blue and coincided, more or less, with the moment that we had all finalised our last submissions and evidence. I agree with all the points made in that objection.

31. The ExA had not read or absorbed any of that material when it applied for the extension so I am at a loss to understand how the ExA can say that there are gaps in

the evidence? The timetable set by the ExA was designed to ensure that the evidence was complete.

32. The extension is grossly unfair. I have to say that I feel that this procedural decision has been taken to assist SPR, with its unlimited resources, and no one else.
33. It can only benefit only SPR who the ExA is now giving an extra 3 months to plug gaps in its case. How can this be fair when SPR has had more than enough opportunity to put forward its case, and its claims to have done so.
34. The extension simply ignores the fact that we, as a community, are exhausted both emotionally and financially by the process and were entitled to, take the ExA at its word when it indicated that proceedings were at an end.

Yours faithfully

Fiona Cramb