



SPR EA1N and EA2 PROJECTS

DEADLINE 12 – COMMENTS ON APPLICANTS RESPONSES TO EXQS3

Interested Party: SASES **PINS Refs:** 20024106 & 20024110

Date: 28 June 2021 **Issue:** 1

INTRODUCTION

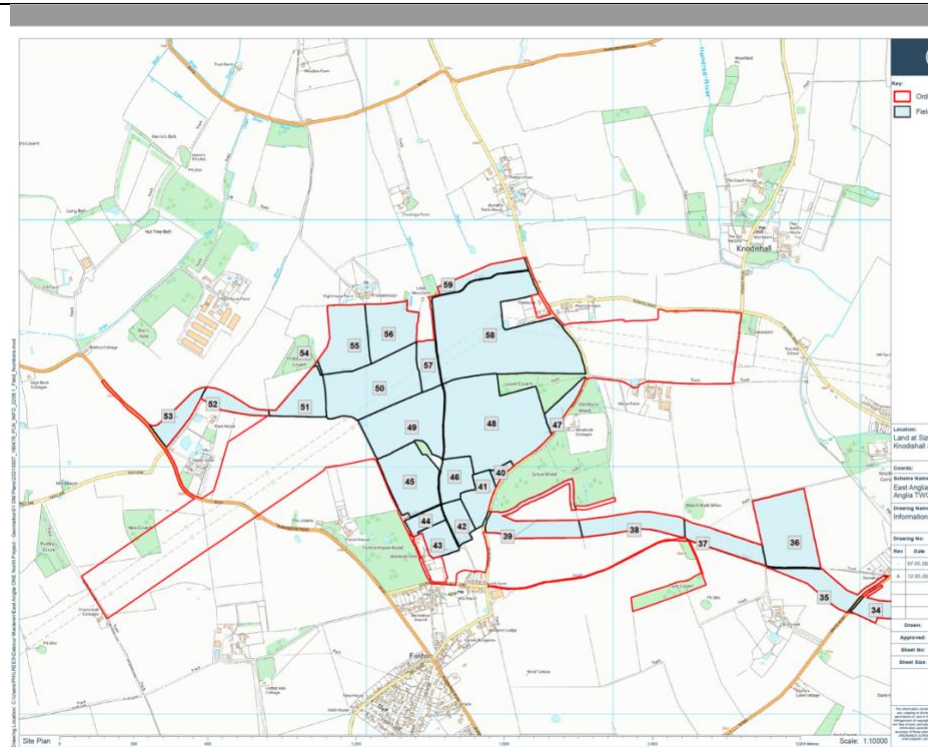
1. This submission sets out SASES' comments on the following responses of the Applicants to ExQs3:
 - a. Volume 4 Applicants' Responses to WQ3 3.2 Biodiversity Ecology and Natural Environment;
 - b. Volume 6 Applicants' Responses to WQ3 3.8 Historic Environment;
 - c. Volume 7 Applicants' Responses to WQ3 3.10 Landscape and Visual Impact;
 - d. Volume 9 Applicants' Responses to WQ3 3.14 Other Projects and Proposals.
2. Given the interconnected nature of the responses/comments of the Applicants, NGET and NGV in relation to other projects and proposals/cumulative impact in response to ExQ 3.14 or otherwise, SASES has made a separate submission at Deadline 12 on Cumulative Impact drawing on those parties' responses/comments. Accordingly SASES comments on the Applicants' responses to WQ3 3.14.2-3.14.6 are set out in that submission.
3. The absence of a comment by SASES on a response by the Applicants does not indicate that SASES agrees with the response.

Volume 4 – Applicants’ Responses to WQ3 3.2 Biodiversity Ecology and Natural Environment

ExQ Ref	ExA Question	Applicants Response	SASES Comment
3.2.29	<p>Badger setts and construction timetable</p> <p>Should any main badger setts need to be removed, please confirm that there would be sufficient time within the overall construction timetable for the mitigation measures set out in the Badger Mitigation Statement [REP6-050] to be undertaken and to take proper effect before their closure.</p>	<p><i>Table 2</i> and <i>Table 3</i> of the <i>Draft Badger Method Statement</i> (REP6-050) provide timings for the implementation of badger mitigation. Should the DCO be made in January 2022, it is anticipated that a pre-construction walkover survey (to assess the status and current use of previously identified setts and identify any new setts excavated) and bait marking surveys of the affected badger setts will be undertaken over approximately three weeks between February and late April as this period corresponds with peaks in badger territorial marking activity. The findings of these surveys would be used to inform the siting of an artificial sett if required. Three months is deemed to be a suitable length of time to agree a location with relevant consultees (including landowners) and obtain all necessary approvals. It is envisaged that an artificial sett could then be created during May 2022, which would take approximately two to three weeks to complete. One-way gates would then be installed on the badger setts identified for closure (in accordance with a badger licence) during July 2022. In line with guidance, these must</p>	<ul style="list-style-type: none"> • In their response, the Applicants initially refer to their Draft Badger Method Statement (REP6-050) regarding timings for implementation of badger mitigation. This document is marked as “Confidential” within the Examination Library and therefore Interested Parties are at a disadvantage in being unable to comment on any important or relevant issues. • The Applicants propose that surveys will be carried out between February and late April 2022 to inform the siting of an artificial sett, which they propose to construct in May 2022. The Applicants have not however identified a site either within or without the Order Limits where such an artificial sett could be constructed. • The existing main sett on the substation site is situated within Field No. 41 on the map below and will be directly impacted by the construction of the haul road and access into the substation site.

be in place for a minimum of 21 consecutive days meaning the identified setts could be closed in August 2022.

An earliest construction start date of mid-2023 was assessed in **Chapter 22 Onshore Ecology** (APP-070). Noting that the latest date for excluding badgers from setts in any given year is 31st November (i.e. installation of the one-way gates), the Applicants consider that the three additional months within the programme of badger mitigation ensure there is sufficient flexibility to ensure that setts are closed in 2022 ahead of the commencement of construction during 2023.



- This is a very large sett with dozens of entry holes spread over a very large area (almost the entire field) and will require the installation of numerous one-way gates and ground-covering nets to achieve closure. There are also other smaller setts, such as in the wooded pit, within the substation site. The badgers favour the sandy soil found in these locations. Photographs of these setts were provided with SASES Deadline 6 post-hearing submission [REP6-129], but were redacted in publication. These can be provided again if required.
- SASES refers to Betts Ecology information on the closure of badgers setts given in the following link:- <https://www.bettsecology.co.uk/insight/badger-mitigation-when-setts-are-found-on-your-land> The ExA should note that the artificial sett

			<p>should be in place for six months <i>before</i> the original sett is closed. Further research suggests that badgers can be reluctant to move and the process of closing a sett can be protracted. A buffer zone of 30M around the artificial sett also needs to be provided.</p> <ul style="list-style-type: none"> • SASES notes, as do the Applicants, that the closure of setts is only permitted between the months of July and November each year and it is noted that the Projects are planned to commence construction mid-2023. Onshore preparation works are planned to take place prior to commencement of the authorised development. In addition to ecological mitigation, these works include site clearance, demolition work, the creation of site accesses and footpaths, all of which would affect the existing badger sett. • The ExA should note the Applicants' reasons for dismissing the Broom Covert (Zone 8) site for EA1N and EA2 in that they felt unable to purchase replacement ecological mitigation land outside of the Order Limits as they would not have Compulsory Purchase powers. See Site Selection and Assessment of Alternatives [APP-052] from which the following statement is made on page 54:- <i>"The need to secure replacement reptile mitigation land for the Sizewell C New Nuclear Power Station development on a voluntary basis, without the ability to secure land by compulsory acquisition (as land would need to be secured prior to SPR's compulsory acquisition rights being made available to allow its use by EDF)."</i> • In SASES' opinion the pressure will be to destroy these badger setts without any proper mitigation in the form of artificial setts as there will be insufficient time to locate a site, negotiate with landowners and obtain the necessary consents before intrusive works affecting the existing setts become necessary on the substation site. • It is noted that there is an area to the east of the substation site marked as potential mitigation land (marked 87 on the Land Plans and referred to as a potential ecological mitigation area), but this is woodland within which in would be impossible to create the extensive setts and burrows
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			<p>needed for artificial setts of the required size to compensate for those existing on the substation site.</p> <ul style="list-style-type: none">• SASES therefore considers that the ExA should require the Applicants to identify a site within the Order Limits for the creation of an artificial site to be secured within the DCO. This is the case with Sizewell C, which has identified its ecological mitigation sites for specific species within the DCO Application. By not identifying a mitigation site for badgers within the DCO, it leaves significant numbers of badgers at risk of destruction by the Applicants.
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Volume 6 – Applicants responses to WQ3 3.8 Historic Environment

ExQ Ref	ExA Question	Applicants Response	SASES Comment
3.8.2	<p>High House Farm</p> <p>Your Deadline 10 document [REP10-025] states that the current view of the Church from High House Farm would be obstructed by mitigation planting rather than by the proposed Project's electrical infrastructure.</p> <p>While this statement may be technically correct, does it sufficiently describe and characterise the adverse effect on this heritage asset, taking into consideration that the proposed planting will be established solely to screen the proposed projects and will take time to establish?</p>	<p>The exchange of views regarding the visibility of the church from High House Farm was started by remarks from Fiona Cramb in her Deadline 7 submissions (REP7-082).</p> <p>In the Applicants' response to Fiona Cramb (REP8-050) it was noted that "<i>construction of the proposed substations and sealing end compounds would not obstruct a view of the church but the proposed screening planting would obstruct the view.</i>" (ID 6) This statement was included simply as a matter of fact, responding to Fiona Cramb, and not as evidence in support of our assessment of High House Farm. As noted in the same response from the Applicants at ID 8,</p> <p><i>"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"</i>. The contribution that setting makes to the significance of High House Farm (as described in Appendix 24.7 of Environmental Statement (ES) (APP-519/520)) relates to our appreciation of the farmhouse within its cluster of former agricultural buildings in a</p>	<p>SASES has consistently challenged the Applicants' identification of the setting of High House Farm and their consequent assessment of the detrimental impact which the development of the substations and, especially, the establishment of the National Grid infrastructure, including sealing end compounds and the construction of an additional pylon to the north of the substation complex. These elements will be in close proximity to the farm, and will have a detrimental effect upon its setting, as well as the impact of the wider substations and change of landscape character. At issue here is the contribution which the long views southwards towards the church makes to the significance of the farm, and SASES has consistently recognised these views as providing an important connection between the medieval core of the settlement (embodied in the church) and the outlying farmsteads which lie to the north, of which High House Farm is one. The existence of the ancient trackway and boundary which links the two elements, which has been recognised by the Applicants as a heritage asset in its own right, serves to emphasise this</p>

		<p>rural agricultural landscape, part of the historic settlement pattern along the edge of Friston Moor</p> <p>The Applicants recognise that the substations and sealing end compounds would be prominent features in the view from the southern edge of the garden grounds to High House Farm. In terms of visual impact this would be a high magnitude of change and a significant effect, as recorded in the assessment of Landscape Visual Impact Assessment (LVIA) Viewpoint 5, only a short distance to the west (LVIA Addendum Table 3.2 document reference ExA.AS-4.D11.V1). However, findings relating to visual impact must not be drawn into the assessment of impact on the significance of heritage assets. Heritage impact assessment is not based on the analysis of visual impact from specific viewpoints but, instead, requires an understanding of how experience of an asset in its setting contributes to significance. This contribution is frequently explained by reference to views but it is fundamentally not a viewpoint- based assessment (unlike visual impact assessment).</p> <p>As noted above, it is considered that the view of the church looking southwards from the garden of High House Farm does not make a substantive contribution to the significance of High House Farm and therefore the severance of the view (for whatever reason) would not materially affect the significance of this Listed Building.</p>	<p>historical connection and allows the layout of the medieval landscape to be read and appreciated. The severance of these long views, whether by the construction of the substations and National Grid infrastructure and/or the additional planting, therefore has a detrimental impact upon the setting and significance of not only High House Farm, but also Little Moor Farm. The additional impacts of the proposals on the trackway itself have been addressed in previous submissions from SASES and others, including the latest statement from Historic England, which we wholeheartedly support.</p>
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<p>3.8.3</p>	<p>Sealing End Compounds</p> <p>Your answer to ExQ2.8.7 [REP6-062] details the process of positioning of proposed cable sealing end compounds, noting that they are driven by the positioning of the pylons to which they are connected, and that their proximity and orientation are governed by construction, operation and maintenance safety and operational requirements. The answer also notes that where practicable the cable sealing end compounds will be aligned to the same orientation as adjacent field boundaries.</p> <p>Given the highly detailed extensive electrical safety requirements, is it likely that any such re-alignment of the cable sealing end compounds to field boundaries will be able to take place?</p>	<p>The Substations Design Principles Statement (document reference ExA.AS-6.D11.V3) includes the following design principle to ensure that the detailed design process considers the cable sealing end compound design and orientation:</p> <p><i>“The design and orientation of the cable sealing end compounds will be aligned to field boundaries where possible, noting the need to maintain safety distances and alignment with the overhead lines”.</i></p> <p>The Applicants consider that there is a reasonable prospect that the cable sealing end compounds can be realigned during the detailed design stage although this is a matter for detailed design. That is why this is a design principle.</p>	<p>Three observations on this response.</p> <ol style="list-style-type: none"> 1. The cable sealing ends are National Grid infrastructure and part of the National Grid NSIP. Yet no explanation from National Grid is provided which is surprising given the ExA’s reference to the “highly detailed extensive electrical safety requirements” 2. The Applicants by their response have indicated that it is not in fact “likely” that there will be any such realignment. 3. As per SASES previous submissions the largest sealing and compound, which has particularly damaging impacts, contains a circuit breaker which breaks the line between Bramford and Sizewell. No justification for this infrastructure has been provided as set out in SASES’ previous submissions (REP11-170). Good design should result in the elimination of one or more of these cable sealing end compounds. 4. SASES also refers to its previous submission (REP11-177) in which it pointed out that the photomontages and OLMP have not properly represented inter alia the cabling from the sealing end compounds.
<p>3.8.4</p>	<p>Cumulative Impacts</p> <p>The ExAs note in the Clarification Note – Archaeology and Cultural Heritage [REP1-021] that the</p>	<p>These questions are best answered by reference to Section 2 of the Clarification Note (REP1-021) which</p>	<p>SASES refers to the response to this question which it made at Deadline 11 (REP11-172).</p>

	<p>Applicants acknowledge that the public right of way trackway to the north of the Church of St Mary which follows the parish and Hundred boundary should be considered as a heritage asset in its own right. The trackway/public right of way links the Church of St Mary, a Grade II* listed building to Little Moor Farm, a Grade II listed building.</p> <p>a) Given the link that the acknowledged (undesignated) heritage asset trackway provides between the Church and Little Moor Farm, does this increase the significance of the two designated heritage assets, either individually or cumulatively (or both)?</p> <p>b) If yes, how would this significance be affected by the proposed projects?</p>	<p>sets out the Applicants' position on these matters in full.</p> <p>The relationship between the trackway and the church is dealt with in paragraphs 11 and 12. These explain that the experience of walking along the trackway towards the church does make a positive contribution to the significance of the church and that the loss of this experience would cause harm to the significance of the church. The relationship between church and trackway and the potential for harm were both identified in the original assessment of the church (ES Appendix 24.7 APP-519/520) and therefore no adjustment to the findings of that assessment is required.</p> <p>The relationship between the trackway and Little Moor Farm is dealt with in paragraphs 13, 14 and 15 of the Clarification Note. Here it is concluded that the trackway does not contribute to the significance of Little Moor Farm and therefore the obstruction of the route would not harm the significance of the Listed Building.</p> <p>To summarise, in answer to Question 'a', the trackway does contribute to the significance of the church but not Little Moor Farm. In answer to Question 'b', the obstruction of the trackway would result in harm to the significance of the church and this matter is fully addressed in the existing assessment of the church.</p>	<p>We welcome the comments made by Historic England on this subject in the latest round of submissions and that we agree with and support everything which they have said on this matter.</p>
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Volume 7 Applicants Responses To WQ3 3.10 Landscape And Visual Impact

ExQ Ref	ExA Question	Applicants Response	SASES Comment
3.10.1	<p>Planting Proposals</p> <p>Your answer to ExQ2.10.4 [REP6-063] states that no decision will be made on the provenance of trees which will be subject of a post-consent procurement process, with most planting not required until around 2024. Will local sourcing of required stock be weighted favourably in the procurement process?</p> <p>If so, could this be confirmed in the Outline Landscape and Ecological Management Strategy (OLEMS)?</p>	<p>The Applicants intend to approach this in a slightly different way by stimulating the local supply chain and creating opportunities to ensure potential suppliers are aware of the timings and the Projects' needs. Due to supply chain rules this would be a far more effective means of ensuring appropriate supplies are locally available for suppliers to access. The Outline Landscape and Ecological Management Strategy (OLEMS) (REP10-005) will be updated to state that the tender documentation will reflect the Applicants preference for regional tree stock.</p>	<p>The ExA's question was about <u>local</u> sourcing. The Applicants' response refers to local supply but the update to the OLEMS is to refer to the preference for "<u>regional</u> tree stock". [emphasis added]. Region can be defined to mean a very large area of the East of England.</p> <p>A distinction has to be made between:</p> <ul style="list-style-type: none"> (i) the source of supply; (ii) what is supplied; and (iii) where it has been grown. <p>A distinction which the Applicants have confused. This needs to be clarified in the OLEMS. The preference should be for native/indigenous trees (which the OLEMS does indicate) which are both grown locally and supplied by a local supplier.</p> <p>It is unclear what "stimulating" means and why "supply chain rules" means this is more effective at ensuring local supplies. No doubt in reality the trees will be sourced from the cheapest large scale supplier regardless of location. This is what "supply chain rules" being procurement rules and processes usually drive.</p> <p><u>Timing of Planting</u></p>

			<p>SASES would observe that planting will not be required until well after 2024, and could be as late as 2028 if not later, given most planting will not take place until after the completion of the construction works. The Project Description (Chapter 6 of the ES APP-054) states that onshore preparation works will take up to 15 months, the substation works up to 30 months and the National Grid substation works up to 48 months.</p> <p>The Applicants have stated in their response to ExQ 3.2.29 that <i>“an earliest construction start date of mid-2023 was assessed in Chapter 22 Onshore Ecology (APP-070)”</i>.</p> <p>Given that the onshore preparation works would be up to 15 months (see paragraph 549 of Chapter 6 of the Environmental Statement) that would seem to be a reasonable estimate assuming the decisions on the DCOs is not delayed. The Project Description further states that the construction of each onshore substation would be up to 30 months and of the National Grid substation up to 48 months – see paragraphs 553 and 554 of Chapter 6 of the Environmental Statement.</p> <p>If one was to assume that both the EA1N substation and EA2 substation were built within the 48 months required to build the National Grid substation, then the earliest construction will be complete will be mid 2027. If the Scottish Power substations are built sequentially then construction will not be complete until mid 2028, assuming the construction of one project immediately follows the other. If there is a gap between the construction of the Scottish Power substations then construction will not be complete until an even later date.</p>
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			In addition this does not take any account of the construction works required for other projects including the extension of the National Grid substation for the NGV interconnector projects which may further delay the completion of construction works at the Friston site.
3.10.2	<p>OLEMS</p> <p>Your answer to ExQ2.10.5 [REP6-063] relates to planting and High House Farm. The ExAs note that you are seeking to balance the proposals in trying to not enclose historic farms while mitigating visual effects on people living in the area. Your answer states that the proposed planting close to the south western boundary of High House Farm is adjacent to existing woodland within the curtilage of this property. An annotated aerial photograph is submitted as part of the answer to demonstrate this point.</p> <p>However, the ExAs noted on their site visits [EV-007d, and as referred to in ExQ2.8.2] that the garden of High House Farm provided clear views across a largely open landscape to the Church of St Mary. This effect was increased by the removal of various ash trees in recent times due to disease [referenced in EV-007d] which would likely change the aerial photograph were it to be taken now.</p> <p>Given this do you wish to add to your answer ExQ2.10.5?</p>	<p>The Applicants agree that the OLEMS (REP10-005) includes planting proposals adjacent to the southern boundary of the grounds of High House Farm. The new planting area proposed by the Applicant close to the south western boundary is proposed to provide additional screening of views to the south where the sealing end compounds will be sited.</p> <p>The Applicant notes the recent removal of various ash trees due to disease, which has resulted in more open views than at the time of the original assessment. The Applicant noted a mature vegetated boundary to the south-west of the property near Landscape Visual Impact Assessment (LVIA) Viewpoint 5 during its site survey work in the area in February 2019 (see photo below), which it considered would provide some screening and a basis from which to justify further planting around this boundary.</p> <p>It is clear that trees were located to the south of the farm both historically</p>	<p>In the question the ExAs identify that <i>'the garden of High House Farm provided clear views across a largely open landscape to the Church of St Mary.'</i></p> <p>Vp 5 shows a similar open view across to the church as that from High House Farm. In response to ExA question 3.10.2, SPR's justification for enclosing this view by planting appears to be that <i>'The Applicants recognise that this will have to balance various interests.'</i> It is unclear how <i>'consultation with local residents ... to discuss their expectations for landscape work in the vicinity of their properties'</i> can address this issue satisfactorily.</p> <p>The severity of the impact on the views from High House Farm is a consequence of the severance that the development will cause between the historic farmhouse to the north and the village and its church to the south. As previously identified, this is a visual severance (as evidenced from Vp 5), a physical severance (the substations/sealing end compounds will lie between the</p>

		<p>(OLEMS Figure 1 (REP10-005)) and recently until their felling due to decline as a result of Ash dieback. Such trees would have prevented or filtered views to the south. The proposed woodland area alongside this would seem to be an appropriate bolstering of such a design intent however, the Substations Design Principles Statement (document reference ExA.AS-6.D11.V3) sets out that consultation with local residents will be undertaken to discuss their expectations for landscape work in the vicinity of their properties and this will be taken into account subject to agreement with other stakeholders. The OLEMS has been designed in outline to ensure that an appropriate framework is delivered. The Applicants recognise that this will have to balance various interests. It is important that there is a proper process to enable this to be done in a transparent way. The design process secured through the draft Development Consent Order (DCO) will facilitate this.</p>	<p>farmhouse and the village) and a severance of connection (the historic route between the village to the farmhouses will be permanently lost).</p>
3.10.3	<p>Combined effect of pylons and proposals</p> <p>Pylons are often referred to as ‘marching across the landscape’, which partly could</p>	<p>The influence of the existing double rows of pylons and overhead high voltage lines can be seen clearly in Viewpoint 5 Figure 29.17a (document reference ExA.AS-4.D11.V1) in which</p>	<p>The only explicit reference to the harm that would be caused by the additional pylon is in response to the ExA question 3.10.3¹. As previously set out SASES consider that the</p>

¹ Applicants’ Response to ExA WQ3 Volume 7 Page 2

	<p>be a consequence of their height and form but also due to the open frame of the pylons themselves and the space that remains beneath them. SASES [REP6-133] state that the proposals would have the effect of making the pylons more dominant than they currently appear, due to the change in the landscape around them that the proposals would cause with an open rural landscape being replaced by a more industrial one.</p> <p>Respond to the above point.</p>	<p>they cross the landscape between Friston and High House Farm at close proximity. With reference to the photomontages from the same view in Figure 29.17b, the Applicant considers that to some extent the proposed substations may draw further visual attention to the electrical infrastructure, increasing the legibility of the function of the pylons/transmission lines in the landscape, however it does not consider that the substation proposals would render the existing pylons more dominant than they currently appear.</p> <p>The loss of open agricultural landscape as a result of ground level infrastructure is recognised, however this does not increase the visual influence of the existing double row of pylons, which already have a prominent influence traversing the landscape between Friston and Fristonmoor.</p> <p>It is the presence of the additional pylon in the view towards Friston (next to the larger sealing end compound with circuit breaker) which is more likely to contribute to increasing the visual influence of overhead pylons in the local landscape.</p>	<p>proposals would have the effect of making the pylons more dominant than they currently appear. Although SPR are reluctant to accept this point they do acknowledge that <i>'the proposed substations may draw further visual attention to the electrical infrastructure, increasing the legibility of the function of the pylons/transmission lines in the landscape.'</i> They have also accepted <i>' the presence of the additional pylon in the view towards Friston (next to the larger sealing end compound with circuit breaker) will contribute to increasing the visual influence of overhead pylons in the local landscape.'</i> SASES consider that this is in effect accepting that the proposals would have the effect of making the pylon line (which would include the additional pylon) more dominant than they currently appear.</p>
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<p>3.10.4</p>	<p>Landscaping – Future</p> <p>Your answer to ExQ2.10.8 [REP6-063] states:</p> <p><i>“The Applicants are not designing the landscaping proposals to accommodate any future projects. Any potential future connections would need to work within the constraints of the Projects’ onshore infrastructure and</i></p> <p><i>landscaping and address this within their scheme design and consent application.”</i></p> <p>The OLEMS [REP10-005] states:</p> <p><i>“The planting and landscape scheme has also been designed in order to not sterilise land for potential future development associated with the National Grid substation.”</i></p> <p>Explain the apparent difference between these two statements.</p>	<p>The Applicant would clarify that the OLEMS has been designed to provide mitigation where it is considered to be most effective for the mitigation of the landscape and visual effects arising from the Projects substations and the associated National Grid infrastructure only.</p> <p>The quote from the OLEMS (REP10-005) is poorly worded and was intended to highlight that the strategic landscaping would not sterilise the ability for the National Grid substation from being expanded in the future.</p> <p>It is noted that as the Projects’ Examinations have progressed the master planning has evolved, with the National Grid Sustainable Urban Drainage System (SuDS) basin now proposed in closer proximity to the western boundary of the National Grid substation. The final design of the onshore substations and National Grid infrastructure, in addition to the post consent stakeholder consultation, will also influence the final landscape design.</p>	<p>The Applicants state that <i>“the quote from the OLEMS (REP 10–005) is poorly worded”</i>. Yet this wording remains unchanged in paragraph 39 (last bullet) of the latest draft of OLEMS (AS-127/128). The Applicants have included additional wording reflecting this response but this does not provide any clarification of the difference between the two statements of the Applicants as referred to in EXQ 3.10.4.</p> <p>SASES position as set out in its submissions including REP1-354, REP3-126 and in its Deadline 12 Cumulative Impact Submission is that the National Grid infrastructure is and has always been intended to be a new connection hub for National Grid for a number of projects and therefore the Scottish Power project has been planned to accommodate this hub from the outset both at the substation site and along the cable route.</p>
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Volume 9 – Applicants responses to WQ3 3.14 Other Projects and Proposals

ExQ Ref	ExA Question	Applicants Response	SASES Comment
3.14.2- 3.14.6			See SASES Deadline 12 submission In respect of cumulative impact.