



SPR EA1N and EA2 PROJECTS

DEADLINE 12 – COMMENTS ON THE APPLICANTS DEADLINE 11 SUBMISSIONS IN RESPECT OF ISH 16, ISH 17, SUBSTATIONS DESIGN, LANDSCAPE AND HERITAGE GIS ADDENDA

Interested Party: SASES PINS Refs: 20024106 & 20024110

Date: 28 June 2021 Issue: 1

COMMENTS ON APPLICANTS RESPONSES TO ISH 16 ACTION POINTS

1. **Action Points 6 to 12** relate to flood risk and these issues are addressed in SASES' Deadline 12 submission on Flood Risk.

COMMENTS ON RESPONSES TO ISH 17 ACTION POINTS

Action Point 4

2. Engagement with ESC and SASES on noise provisions
3. The technical experts of the applicants (Colin Cobbing and Alisdair Baxter), ESC (Joe Bear) and SASES (Rupert Thornely-Taylor) met on 16th of June 2021. In addition three officers of ESC attended, Philip Ridley, Naomi Gould and Mark Kemp but only Mark Kemp participated in the meeting.
4. The meeting focused on paragraph 5.11.4 of EN-1 – Applicant's assessment. Rupert Thornely-Taylor prepared a note of the meeting which is attached at Appendix 1 and this was sent to all parties on 18th of June 2021. SASES has not received any response to this note to date. The advice which SASES has received from Mr Thornely-Taylor in relation to the specific matters discussed in the meeting are set out in the final section of this note.
5. The following matters were not discussed at the meeting:
 - the need for noise monitoring to take place when the substations are operating at full capacity and for this to be stated in Requirement 27;
 - the need for noise monitoring to take place on a regular annual basis (and for this to be stated in Requirement 27) otherwise if there is a problem with noise it could fall to the District Council or local residents to fund noise monitoring which is unreasonable;
 - matters relating to the design principles statement were not discussed in particular in relation to paragraph 71. The design principle should be to mitigate and minimise other adverse impacts consistent with EN-1 section 5.11. This should not be qualified by the words "*insofar as these mitigation measures do not add unreasonable costs or delays to the project*" which are inconsistent with policy. The limit set out in Requirement 27 is to prevent significant adverse impacts on health and quality of life from noise consistent with paragraph 5.11.9, first bullet. Paragraph 5.11.9 second bullet requires other impacts on health and quality of life from noise to be mitigated and minimised. This requirement of policy is not qualified

by reference to unreasonable costs or delays or in any other way. In this context it must be remembered that Friston is an exceptionally quiet rural area.

COMMENTS ON SUMMARY OF ORAL CASE ISH 16

Agenda Item 2 Design Matters

6. Para 12 - During ISH16 [\[EV-142\]](#) Brian McGrellis for the Applicant accepted that SASES proposal for reducing the height of power capacitor banks by splitting was entirely feasible. This agreement should be reflected in a reduction in the Rochdale Envelope height of these components by amending Requirement 12 of the draft DCOs and in the Substations Design Principles Statement.
7. Para 14 - The Applicants assert that a single project must connect into four OHL circuits but provide no justification for this. The Galloper project (originally approved as 504MW) was specified to connect to two specific circuits only, but after downsizing to 353MW this was reduced a single fixed circuit with no attendant cable sealing ends. The Applicants/NGET should undertake simplification and reduction in the design of the NGET substation and further the number of cable sealing ends should be reduced for each project. To secure this Requirement 12 of the draft DCOs should be amended accordingly.
8. Para 19 - The Applicants will be well aware that Design Review is an integral element of all significant Engineering Design activities and SASES does not accept that wholesale rejection of its proposals is appropriate. The issue particularly arises because of the Applicants choice to select a site having extreme sensitivities to cause landscape & visual, heritage, acoustic, flooding and other adverse impacts and the concomitant need to ensure that the best possible outcome is achieved. Leaving external review until the design has been 'set in concrete' cannot be acceptable. The Applicants are encouraged to make a constructive proposal to take this topic forward which might include a Design Panel operating within the Design Council framework, but with a remit to address all design aspects, not just architectural and where the Design Panel members have relevant expertise including power engineering expertise. As an example of the need for such a panel, communities affected will want to be assured that any emphasis on economy has not been at the expense of landscape & visual impact or noise emissions. The Energy Act 1989 requires that economy, efficiency, coordination, and environmental impact are all important considerations, and not one as a priority at the expense of others.

Agenda Item 3 Flood Risk and Drainage

9. SASES have commented on flood risk and drainage during construction and operation in its Deadline 12 submission on flood risk.

COMMENTS ON SUBSTATION DESIGN PRINCIPLES STATEMENT

10. See comments in respect of paragraph 71 above concerning noise mitigation.
11. SASES position remains unchanged from that previously submitted at Deadline 11, especially with regard to the need for a Design Review Panel with a broad remit as strongly recommended by National Infrastructure Commission and the November 2020 Treasury Report. This position is taken in order to secure the best outcome for all affected parties of any consented project. Efficient Design Review should result on a first time right, on time outcome, that all can be satisfied with, and SASES is surprised the Applicants do not currently support this approach.

12. The need for such a panel is demonstrated by the debate concerning the height of harmonic filters see paragraph 6 above. In ISH 16 the Applicant accepted the validity of SASES' submissions regarding the possibility of splitting the power capacitor banks to reduce their height and visual impact. It should be noted that at Phase 1 consultation the harmonic filters were to be 21m high but this was reduced at Phase 2 consultation to 18m. SASES was told that this was because of the removal of enclosures over the filters intended to reduce noise emissions. Later, at Phase 3.5 consultation, the enclosures were brought back in, this time apparently because of concerns about salt in the atmosphere causing corrosion to the electrical apparatus. But they are not present in the current plans. The absence of filter enclosures from the current proposal should therefore mean that there is spare area on the substation footprint which may well be adequate to accommodate split power capacitor banks. In the absence of a design review panel with a member who was a power engineering expertise this type of issue may well be overlooked and/or not properly addressed.
13. Also as has been demonstrated by SASES' submissions in relation to design, design should not be firmly fixed before there is meaningful consultation with the community otherwise the consultation will be meaningless.
14. The plan currently attached to the SDPS is inadequate as it omits many key features for which design is relevant. It is suggested that the OLMP General Arrangements Fig 3 and Fig. 9 (GIS version) from the latest OLEMS would be appropriate with the caveat that these be corrected to include all the overhead cable connections etc as set out in SASES Deadline 11 Submission - Comments on the Drawings in the Design and Layout of the Substations (REP11-177).

COMMENTS ON HERITAGE ASSESSMENT GIS ADDENDUM

15. See comments of Dr Richard Hoggett - Cultural Heritage Assessment: Third Addendum attached at Appendix 2.

COMMENTS ON LANDSCAPE AND VISUAL IMPACT ASSESSMENT GIS ADDENDUM

16. See comments of Michelle Bolger - Landscape Briefing Note 11 attached at Appendix 3.

APPENDIX 1

EAST ANGLIA ONE NORTH AND EAST ANGLIA TWO

Report of meeting of noise experts and others 16 June 2021 10:00-12:30

Present (via Teams):

Rupert Thornely-Taylor, Rupert Taylor Ltd, expert for SASES

Joe Bear, Adrian James Acoustics, expert for ESC

Colin Cobbing, Pinnacle Acoustics, expert for applicants

Alasdair Baxter, TP Energised, expert for applicants

Philip Ridley, Naomi Gould and Mark Kemp, officers at ESC.

The meeting was held in response to an action point which arose from issue specific hearing 17:

4. Engagement with ESC and SASES or noise provisions

Noting the potential to reach final agreed positions on provisions relevant to the control of noise, the Applicants are asked to engage in final dialogue with ESC and SASES.

Discussion took place in the context of the requirements of Overarching National Policy Statement for Energy (EN-1) and its paragraph 5.11.4 Applicant's assessment, under the heading Noise and Vibration

Matters noted

It was noted that, with regard to the first bullet point of 5.11.4 that the applicant should include "identification of any distinctive tonal, impulsive or low frequency characteristics of the noise;" the applicants were not in possession of 1/3 octave band source noise data to enable the reference method set out in Annex D to BS 4142:2014+A1:2019 to be used in the assessment of whether tonal penalties apply, in accordance with requirement 27(2), prior to the close of the examination.

With regard to the last bullet point in 5.11.4 in EN-1, requiring the applicant to include "measures to be employed in mitigating noise." It was noted that as the applicants had made no assessment of tonality there had not been an engineering assessment of the achievability of the requirement should the result of the tonality assessment lead to a tonality correction and a need for further noise reduction.

Matters agreed

On the third bullet point "the characteristics of the existing noise environment;" it was agreed that background noise levels were low enough to necessitate consideration of absolute levels as referred to in BS 4142. It was agreed that BS 4142 does not state numerical values of absolute levels.

It was agreed that compliance with the noise requirements in requirement 27 should apply at all times and not solely at the times of compliance surveys, and that if ESC received complaints they would be assessed against the noise limit requirements at any time, whether or not compliance had been demonstrated during a previous noise survey, and enforced accordingly.

Matters not agreed

The applicants and SASES did not agree the appropriate level arising from consideration of the need for an absolute criterion. SASES have requested that a limit of a rating level of 30 dB LAeq (15 minutes) be substituted for the figures of 31 dB and 32 dB in requirement 27(1)(a) and 27(1)(b) respectively. The applicants do not agree to this on the grounds that the figures of 31 and 32 represent the lowest levels the applicants can achieve. There was disagreement on the understanding of the wording included in BS4142 regarding context.

The applicants' experts did not agree that St Mary's church should be subject to a noise requirement as requested by SASES.

The position of SASES

RT reported that his concerns in respect of the specific matters discussed in the meeting, of which he has advised SASES, would be met if

- 1) The noise limit requirement in the DCO is reduced to a rating level of 30 dB LAeq (15 minute)
- 2) Prior to grant of a DCO a 1/3 octave band assessment is carried out to determine the identification of any distinctive tonal characteristics, in conformity with EN-1 5.11.4.
- 3) Prior to grant of a DCO engineering consideration of the mitigation measures needed to mitigate any identified tonal character is provided, in conformity with EN-1 5.11.4.
- 4) The wording of the DCO is clarified so that the requirement 27 noise limits will apply at all times in the future, without regard to any compliance monitoring results that may have been previously submitted.

APPENDIX 2

Cultural Heritage Assessment: Third Addendum

Dr Richard Hoggett (Richard Hoggett Heritage), June 2021

1. Introduction

- 1.1 This is a further addendum to the *Cultural Heritage Assessment* prepared by Richard Hoggett Heritage for SASES, dated October 2020 and submitted at Deadline 1, the first *Cultural Heritage Assessment: Addendum*, dated January 2021 and submitted at Deadline 3, and the second *Cultural Heritage Assessment: Addendum*, dated April 2021., and submitted at Deadline 9.
- 1.2 This document provides commentary on the 'Heritage Assessment GIS Addendum' (ExA.AS-30.D11.V1) submitted by the applicants at Deadline 11, in which they present the results of an additional assessment of the impact of the proposed schemes on surrounding heritage assets, assuming that the National Grid Substation employed gas-insulated switchgear (GIS). The applicants' initial assessment, and subsequent revision, were both based on the premise that the National Grid substation would employ air-insulated switchgear (AIS). It should be noted that the proposals for the EA1N and EA2 substations remain unchanged in this assessment.
- 1.3 As is to be expected, the vast majority of the applicants' new report repeats verbatim the content of the initial reports, particularly with regard to the significance of the affected heritage assets. We have commented at length on the shortcomings of these assessments in our previous submissions, and do not consider it necessary to repeat these arguments again at this very late stage of the proceedings.
- 1.4 Similarly, the new assessment only focusses on the visual change in the setting of the affected heritage assets during the operational phase of the projects, and again we have previously stated our belief that the impacts of the construction and decommissioning phases should also be a material consideration and in such assessment.
- 1.5 This addendum focusses on the differences in the conclusions drawn in the applicants' previous assessments and the current assessment, which result from the proposed use of GIS over AIS.

2. Cultural Heritage Impact

- 2.1 As has been discussed at length in previous documents and during oral submissions, the list of affected heritage assets comprises seven listed buildings which surround the site:
- Little Moor Farm (1215743, Grade II);
 - High House Farm (1216049, Grade II);
 - Friston House (1216066, Grade II);
 - Woodside Farmhouse (1215744, Grade II); and
 - Church of St Mary, Friston (1287864, Grade II*);
 - Friston War Memorial (1435814, Grade II);
 - Friston Post Mill (1215741, Grade II*).
- 2.2 In the new assessments of the impact in individual heritage assets caused by the switch to GIS, there is no change from the conclusions presented by the applicant in their initial assessment. As has been discussed in previous submissions, I do not support these conclusions and they have also been challenged by many of the other parties with heritage expertise, including Historic England.
- 2.3 With regard to **Little Moor Farm**, there is no change to the applicant's original conclusions that the proposals would result in an impact of medium magnitude translating into an effect of moderate significance, and I would agree with this assessment. However, the new assessment also repeats the initial conclusion that the proposals would result in impact of low magnitude on **High House Farm**, translating into an effect of minor significance. I have consistently disagreed with this assessment since the outset, and consider that any impact recognised for Little Moor Farm has equivalence for High House Farm. Therefore, for the reasons set out in previous submissions, I consider the applicants underestimate the impact on High House Farm, which should be recognised as an impact of medium magnitude translating into an effect of moderate significance.
- 2.4 As discussed in previous submissions, I disagree with the applicants' identification of the setting of **Friston House** and, therefore, also disagree with their assessment of the impact which the proposed developments will have upon that significance. Again, in this new assessment the applicants' conclusions remain unchanged, with a negligible impact of minor significance being identified. As argued previously, I consider this to be an impact of low magnitude translating to a minor significance of effect.
- 2.5 With regard to **Woodside Farmhouse**, the applicants conclusion is again unchanged, in that the scheme would result in an impact of low magnitude and minor significance. In my previous submissions, I have identified this harm as being of medium magnitude of impact resulting in a moderate significance of effect.
- 2.6 The assessment of the impact of the proposals on the **Church of St Mary** is also unchanged, with the applicants identifying a low magnitude of impact resulting in a moderate significance of effect. As has been rehearsed at length in written and oral submissions during the course of this hearing, I do not agree with the applicants' identification of a low magnitude impact of the main proposals on the church of St Mary, instead identifying a high magnitude of impact equating to a major significance of effect. In planning terms, this would equate to 'less than substantial harm' at the

upper end of the scale, and this is an opinion shared by many of the respondents with heritage expertise in this case.

- 2.7 The revised assessment of the impact on **Friston War Memorial** also remains unchanged, with the applicant identifying a negligible magnitude of impact under the proposed scheme equating to an effect of minor significance. In my own previous assessments, I have disagreed with the applicants' conclusions regarding both the extent of the setting of the memorial and the degree to which that setting contributes towards its significance, identifying instead a medium magnitude of impact resulting in a moderate significance of effect, equating to 'less than substantial harm'.
 - 2.8 With regard to **Friston Post Mill**, I agree with the applicant that the proposed scheme results in a negligible magnitude of impact causing an minor significance of effect, and do not consider that this will be changed by the proposed expansion of the National Grid substation.
3. **Outline Landscape Mitigation Plan (OLMP),**
- 3.1 The final section of the GIS addendum assesses the reduction in this impact which might be achieved by the application of the Outline Landscape Mitigation Plan (OLMP), giving a residual impact on each of the heritage assets.
 - 3.2 With regard to **Little Moor Farm**, the applicant considers that the OLMP will provide a substantial degree of mitigation, although the assessment states that 'these proposals would not entirely screen the setting of Little Moor Farm from the onshore substations and National Grid substation'. They consider that this will reduce the impact to low magnitude, equating to a minor significance. However, significant concerns have been raised throughout these proceedings about the reliability of the projected growth rates, which are considered to be overly optimistic, and it is considered that the degree of screening anticipated by the applicant will not be achievable given the constraints of the local environment. These issues have been discussed at greater length in other submissions by SASES and others.
 - 3.3 In the case of **High House Farm**, the applicant concludes that the proposals contained within the OLMP would reduce the impact on significance, but not sufficiently to change their assessment of impact. That is to say, that the proposals in the Outline Landscape Mitigation Plan do not actually mitigate the impact of the scheme on High House Farm. Similarly, in their revised assessment the applicant concludes that the proposals in the OLMP would 'reduce but not remove the visibility of the substations' from **Friston House**, and their final assessment again remains unaffected by the proposed mitigation.
 - 3.4 With regard to **Woodside Farmhouse**, the applicant concludes that the OLMP would considerably reduce the impact on significance, as after 15 years the proposed woodland would be tall enough to screen the substations, with the exception of their highest gantries. Consequently, the applicants reduce their assessment to an impact of negligible magnitude of minor significance. Again, as with Little Moor Farm, this reduction is contingent upon growth rates the achievability of which is subject to question, and it is not considered that this will be sufficient to mitigate the impact in this fashion.
 - 3.6 Finally, the applicants conclude that the proposals within the OLMP will not be sufficient to reduce the identified impacts on the **Church of St Mary**, the **Friston War Memorial** or the **Friston Post Mill** either. Again, this would appear to indicate that the

proposed mitigation measures are considered by the applicants' own heritage experts not to be effective in reducing the impact of the proposed scheme on heritage assets.

4. Conclusion

4.1 The 'Heritage Assessment GIS Addendum' (ExA.AS-30.D11.V1) submitted by the applicants at Deadline 11 indicates that there is no meaningful difference in heritage impact between the adoption of air-insulated or gas-insulated switchgear at the National Grid substation. I would agree with this conclusion, but I do not agree with the conclusions of the assessments of heritage impact presented by the applicants.

4.2 As I have set out previously, I do not agree with most of the conclusions reached by the applicants in their various heritage impact assessments, particularly with regard to their assessments of the impact on the church of St Mary and the surrounding farmhouses. For reference, my assessments of these impacts are summarised, together with those of the applicant, in the table below and full details can be found in my Cultural Heritage Assessment submitted at Deadline 1.

Heritage Asset	Heritage Importance	Applicant's Assessment		My Assessment	
		Magnitude of Impact	Significance of Effect	Magnitude of Impact	Significance of Effect
Church of St Mary	High (II*)	Low	Moderate	High	Major
Friston War Memorial	Medium (II)	Negligible	Minor	Medium	Moderate
Little Moor Farm	Medium (II)	Medium	Moderate	Medium	Moderate
High House Farm	Medium (II)	Low	Minor	Medium	Moderate
Friston House	Medium (II)	Negligible	Minor	Low	Minor
Woodside Farmhouse	Medium (II)	Low	Minor	Medium	Moderate
Friston Post Mill	High (II*)	Negligible	Minor	Negligible	Minor

4.4 With regard to the proposals set out in the Outline Landscape Mitigation Plan, it is telling that in most cases the applicants' own heritage experts do not consider that the proposals offer sufficient mitigation to reduce their assessment of heritage impact. This effectively means that the proposed mitigation schemes do not work. In the two instances where the OLMP is thought to reduce heritage impact, both cases rely upon the achievement of a rate of tree-growth which is considered to be overly optimistic given the constraints of the local environment.

APPENDIX 3

Michelle Bolger - Landscape Briefing Note 11

Landscape Briefing Note 11

Project: 1080 East Anglia One North and East Anglia Two
Date: 27th June 2021
Purpose: Notes responding to SPR's landscape related submissions at Deadline 11
Reference: 1080 BN011 Responses to Deadline 11 Submissions FINAL .docx

Submissions Reviewed

REP11-028 ***ExA.AS-4.D11.V1 EA1N&EA2 Landscape and Visual Impact Assessment GIS Addendum - Version 01***

REP11-029-44 ***Appendices to Landscape and Visual Impact Assessment GIS Addendum - Version 01***

REP11-091 ***Applicants' Response to ExA WQ3 Volume 7***

R17QF ***Rule 17 Questions of 18 June 2021 (R17QF).***

[No ref yet] ***Outline Landscape and Ecological Management Strategy (OLEMS) 11th June Revision: Version 06***

REP11-028 ExA.AS-4.D11.V1 EA1N&EA2 Landscape and Visual Impact Assessment GIS Addendum Version 01 (LIVIA GIS Addendum)

1. REP11-028 and Appendices provide an assessment of the difference in visual impact between the choice of a GIS system for the NG Substation or an AIS system. The choice of a GIS NG Substation which has a smaller footprint might have allowed for additional mitigation through the rearrangement of other elements of the NG Substation that are particularly visually intrusive (such as the additional pylon or the larger sealing end compound), or through additional structural planting or reduction in the overall landtake. However, none of these opportunities have been considered, the only difference under consideration is whether the main body of the NG Substation uses an AIS or GIS system.
2. Some of the reasoning behind this limited consideration of alternatives is provided in the latest version of the Outline Landscape and Ecological Management Strategy (OLEMS) 11th June Revision: Version 06 which states

that *'The outline design of the strategic planting proposals of the landscape scheme (i.e. that planting which provides the most effective landscape framework and visual mitigation) is such that it does not sterilise land for potential future development associated with the National Grid substation.'*¹ A similar statement was queried by the ExA (Question 3.10.4) and SPR's answer was *'The quote from the OLEMS (REP10-005) is poorly worded'*. However, the revised statement conveys the same information, that allowing for potential future development associated with the National Grid substation has been a factor taken into account when designing the strategic planting for the scheme.

3. Based on the narrow choice between the GIS system and the AIS system I agree with the conclusion of the LVIA addendum that there would be no overall visual benefit to adopting one system rather than the other.² I do not agree with the conclusions in the LVIA Addendum with regard to the degree and significance of the harm as I have previously set out. Having reviewed the alternative visualisations from the 8 viewpoints selected I have a number of additional comments to make which are set out below:
4. From **Vp 2** which is a particularly sensitive location on the edge of Friston village, the GIS building is clearly visible above the intervening tree line and noticeably worse than the AIS option. The statement in the LVIA GIS Addendum that *'The NG GIS substation will be largely screened by intervening planting by Year 15'*³ is inaccurate; there is little change after 15 years. Indeed, it is partly contradicted by the following statement in the LVIA GIS Addendum that *'the upper part of the GIS building will be visible over the tree tops.'*⁴
5. The LVIA GIS Addendum does not point out that what can be seen in this visualisation does not reflect the full spread of the equipment which will extend visually to the left, almost as far as the next set of pylons. These pylons are outside the frame of the visualisations but can be seen on the left of the 90 degree baseline photograph (Figure 29.14a). To the left of the GIS building will be the additional pylon and the largest sealing end compound. Although they are just behind the tree on the left-hand edge of

¹ Outline Landscape and Ecological Management Strategy (OLEMS) 11th June Revision: Version 06 Para 39 final bullet point

² This was the conclusion that I reached in Briefing Note 10 dated 1st April 2021 when alternative visualisations from north of the site only had been submitted.

³ REP11-028 ExA.AS-4.D11.V1 EA1N&EA2 Landscape and Visual Impact Assessment GIS Addendum - Version 01 Page 27

⁴ REP11-028 ExA.AS-4.D11.V1 EA1N&EA2 Landscape and Visual Impact Assessment GIS Addendum - Version 01 Page 27

the visualisations they will be clearly visible a few metres down the PRoW.

7. From **Vp 3** it is agreed that the choice of AIS or GIS will make no difference. However, it has been pointed out previously that this location on Grove Road at the start of the footpath does not represent views from the footpath itself, from where there will be much more open views towards the substations. The GIS option is likely to be more intrusive than the AIS option from this footpath.
6. From **Vp 5** the AIS option is visually more intrusive. However, it is the largest sealing end compound and the introduction of an additional pylon, significantly closer to the viewpoint than any of the existing pylons, that are the most intrusive element in these views and these sit to the west of the gap that would be created. This intrusiveness is particularly harmful from Vp 5 because the pylon and the sealing end compound are directly in front of the view towards Friston church. It is this particular arrangement that is most harmful to the visual amenity from Vp 5, the visual amenity of the residents of High House Farm and the setting of the historic farmhouse (see evidence of Dr Richard Hoggett).
7. The visualisations from Vp 5 are not fully representative of the visual harm as they do not include several components that would be present. The omissions area set out in *SASES REP11-177 Comments on the drawings in the design and layout of the substation's submission in response to Rule 17QE Issued on 13 May 2021*. For ease of reference the omissions listed are:
 - The OHLs end on the right-hand pylon, when in fact they continue on;
 - The quad core OHLs are shown as thin cables;
 - The cables are inaccurately positioned on the tension pylon, they should be much higher;
 - None of the OHL insulators are shown (they will be especially prominent on the tension pylon by the western most sealing end); and
 - The many cables and insulators and hardware from the sealing ends and gantries up to the OHL are not shown.
8. The GIS option would be visually less intrusive from Vp 5 especially if only one SPR substation was constructed which, as previously indicated would be on the site of the eastern substation. However, no planting mitigation, or

other mitigation such as relinquishing of the land freed up is proposed should the GIS option be chosen, or only a single SPR substation constructed. Consequently, few of the potential benefits of these options would be realised.

9. It appears that the AIS baseline 53.5 degree image for **Vp 9** (Figure 29.21a) includes the additional pylon so is not actually the baseline view. This is not immediately apparent because it is to the left of a telegraph pole. In reality, as one moves around this location the telegraph pole will have little effect on the visibility of this additional pylon. There is very little reference in the LVIA or the LVIA GIS addendum to the impact of the additional pylon, the re-routing of the overhead line or the cables running from the largest sealing end compound to the pylon. Within the ES LVIA and its subsequent Addendums the pylons are almost always mentioned in mitigating terms, such as in the description of the view of the GIS building from Vp 9 *'It is also viewed in the context of the large-scale overhead pylons and high-voltage cables that form the backdrop to Friston in this view.'*⁵ The additional pylon, which will be as large or larger than any of the other pylons, will be inserted into what is currently a wide gap between two sets of pylons. This is the gap against which the church, for example is currently viewed. Whilst the additional pylon is not immediately adjacent to the church from Vp 9 it is likely that it will be closer and more intrusive from other locations in the near vicinity, particularly when the telegraph pole is not in the immediate foreground.

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10. In ExA question 3.10.2 they identify that *'the garden of High House Farm provided clear views across a largely open landscape to the Church of St Mary.'* 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 *'The Applicants recognise that this will have to balance various interests.'* It is unclear how *'consultation with local residents ... to discuss their expectations for landscape work in the vicinity of their properties'* can address this issue satisfactorily.
11. 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

⁵ LVIA GIS Addendum Page 31

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 farmhouse and the village) and a severance of connection (the historic route between the village to the farmhouses will be permanently lost).

12. The only explicit reference to the harm that would be caused by the additional pylon is in response to the ExA question 3.10.3⁶. As previously set out I consider that the 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 *'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.'* They have also accepted *'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 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.

Rule 17 Questions of 18 June 2021 (R17QF)

13. **R17QF.7 c)**

SASES drainage consultant has been pointing out for some time that the woodland within the SUDS basins, described as 'wet woodland' would be incompatible with the use of the basin for drainage. In addition to the incompatibility, SPR have accepted that the conditions for wet woodland would not be present, and it has been omitted from the Outline Landscape and Ecological Management Strategy 11th June Revision: Version 06 (OLEMS V6). As SASES have been pointing out for some time, there have been significant 'drought' periods in the recent past in this part of East Anglia and it is reasonable to suppose that they will occur in the future.
14. The approach to planting in and around the SUDS basins is an example of the over optimistic approach adopted by SPR with regard to the planting generally. OLEMS V6 Figure 3 has presented and still presents a visually misleading view of the SUDS basins, suggesting that they will be 'soft' features in the landscape. They will need to be structures engineered to appropriately safety standards, consistent with the retention of 1,000's m3

⁶ Applicants' Response to ExA WQ3 Volume 7 Page 2

of water immediately uphill of residential housing. Bunding is shown on OLEMS V6 Figure 4 although whether the basins will require bunding has deliberately been left vague. Engineered basins may have more in common with the adjacent substations that the landscape that they are replacing.

15. The rationale behind the latest changes to the SUDS basins and associated planting is unclear and leaves several unanswered questions about the effectiveness of the mitigation planting in this area. In particular, with reference to OLEMS V6 Figure 3:
 - Why has the southern basin has been rotated?
 - Why is the mitigation woodland shown immediately adjacent to the bund of the northern basin but at some distance from the bund of the southern basin?
 - Does OLEMS V6 Figure 3 show the 5m clearance (no trees or shrubs) around the footprint of the northern SUDS basin which the outline operational drainage management plan states will be maintained.⁷
16. Both SUDS basins are close to the route of the PRoW which is to be retained and will become the most direct route to the landscape to the north of Friston in which the historic farmhouses are located. A potential reduction in the depth of planting that can be accommodated has the potential to affect the visibility of the SUDS basins and the substations from the PRoW.

⁷ Paragraph 130 of the outline operational drainage management plan.