

From: [REDACTED]
To: [East Anglia ONE North; East Anglia Two](#)
Subject: Written Representations - Shipman - 20024363, 20023176, 20024361 and 20023179
Date: 26 October 2020 12:47:59
Attachments: [Summary WRs-Shipman 20024363 & 20024361.docx](#)
[Written Representations-Shipman-20024361& 20024363 .pdf](#)

Dear Sirs

Scottish Power Renewables: East Anglia Two and East Anglia One North

Please find attached our Written Representations, together with a Summary thereof, which we are submitting in advance of Deadline 1. We ask that the Examining Authority take these representations into account in their decision-making process.

Kind regards

Ian and Mary Shipman

[REDACTED]

[REDACTED]



Scottish Power Renewables – East Anglia One North and East Anglia Two

Written Representations of Ian Shipman (20024363 and 20023176) and Mary Shipman (20024361 and 20023179)



October 2020

Introduction

1. Firstly we wish to give our support to SASES and Friston Parish Council in representing the views of the community in that these projects should not go ahead.
2. We have been residents of Friston for 27 years drawn by the beauty and tranquillity of the area, together with its cultural and leisure facilities. All the reasons for being here are now under threat from SPR's projects as well as a number of other energy projects including Sizewell C, Nautilus & Eurolink Interconnectors, extensions to Galloper & Greater Gabbard windfarms and other interconnector projects SCD1 and SCD2, which are all planned in one small attractive rural area and within similar timeframes. It cannot be right that all this infrastructure should suddenly be concentrated on the Suffolk Heritage Coast without any overall cohesive plan. SPR have failed to fully assess the **cumulative impacts** of these other projects, several of which are planned to connect to the grid at the currently proposed National Grid substation in Friston.

Traffic

3. The concentration of these proposed projects, and in particular EA1N and EA2 in combination with the development of Sizewell C will bring an unacceptable amount of heavy traffic onto an unsuitable rural road network. The junction of the A12 with the A1094 is an accident blackspot and SPR's proposed 'traffic calming' measures are wholly inadequate to mitigate this. HGVs will be queuing to turn onto the A1094 and their slow acceleration will exacerbate the danger at the junction.
4. The A1094 is a narrow road with high hedges and no footpaths for the great majority of its length. The road is well used by slow-moving farm vehicles and cyclists. There are places where the road is too narrow for two large lorries to pass. Its use by SPR construction traffic will cause congestion and potential danger for existing users and pedestrians.
5. The proposal to use the cable route between Knodishall and Friston as a construction access for HGVs to the substation site will cause further problems of noise and dust in the locality. This area of east Suffolk has very light sandy topsoil which is easily dispersed and blown about. It is also proposed that this section of the haul road should be double-width of 9M and will be at this width where it crosses the virtually single-track, unclassified Grove Road. Grove Road is heavily used by farm vehicles and cyclists (forming part of several promoted cycle routes), as well as being a useful link for local residents to Leiston and Saxmundham. The crossing of the haul road at this point will cause danger, congestion and dispersal of mud on Grove Road. Grove Road is also liable to flood from the fields to the east, over which the haul road is proposed to be built and the introduction of membranes and surface materials will substantially increase the existing flood risk, which we do not

believe can be effectively mitigated. *[Reference 1 – photos of flooded field and Grove Road October 2019]*

Landscape

6. The impact on the landscape so close to the small village of Friston will be devastating. The substation site is on higher ground than the village and there is no effective existing screening between the village and the site. East Anglia has the lowest rainfall in the UK and planting is slow and difficult to establish, with farmers having to rely on irrigation during the summer months. Many trees simply do not grow to their expected mature heights, even with irrigation, which is essential to their survival. The projected growth rate of the mitigation planting has been grossly overstated by SPR.
7. SPR place much emphasis on the existing screening of Grove Wood and Laurel Covert. However in January 2020 the Forestry Commission issued Felling Licences affecting both these woods, the references being 017/3287/2019 and 017/949/2019, which can be found on the Forestry Commissions interactive map with a screenshot at *Reference 2a*:
<https://www.forestergis.com/Apps/MapBrowser/>
8. The Licences allow for removal of all conifers and a rolling programme of coppicing and felling of broadleaf trees in both Grove Wood and Laurel Covert. Substantial felling works to part of Grove Wood opposite the proposed substations site commenced in May 2020. This has not been taken account of in SPR's visuals and it should be anticipated that further significant felling work to the remainder of the woods will continue to take place.
[Reference 2b is a photograph following felling works carried out in May 2020].
9. The proposed substations site is on sloping land from east to west and it will be necessary to raise the ground level of the land by several metres on the western side to avoid flood risk (this part of the site is Flood Risk 3 for surface water) and create a level site. This has not been accounted for in SPR's visualisations, which have simply imposed a generic design of the substations on photographs of the existing ground levels. The raising of ground levels will increase the visibility of the substations from the village and mean that any introduced screening is far less effective.
10. The cable route will sever the local area in two and damage a much-prized landscape for leisure activities. Given the number of other energy projects proposed to connect at Friston, it is very likely that the cable route and haul road will remain in place for a very significantly long period before any re-instatement can take place. This will blight the area for perhaps a decade or longer.
11. The choice of the landfall site just north of Thorpeness is particularly inappropriate with its fragile cliffs and unique coastal flora and dunes. This is a very popular spot for local people wishing to visit the beach and having seen the disruption caused at Bawdsey for the landfall of SPR's EN1 project, the effect would be disastrous in terms of the amount of land taken for contractors' compounds with vast amounts of machinery and vehicles, as well as the area taken for the works themselves.

Flooding

12. The village of Friston has a long history of flooding events. The Friston Watercourse bisects the village in roughly a north/south direction and land in the immediate vicinity of the watercourse (including our own property) is in Flood Zone 3 for surface water flooding. We have suffered a number of such events, including water entering our house itself.
13. Works were carried out in 1993 by the Environment Agency (or its predecessor) to alleviate the situation, but these works have been only partially successful. It is as a result of the intervention of the EA that the watercourse became designated as a “Main River”. It is in reality a mostly overgrown ditch which acts as an ephemeral watercourse. The watercourse is not complete and just south of the village near the A1094 there is what is called locally the “ponding field”, which has been created by the introduction of a raised bund and concrete weir. This is to prevent flooding to properties at Firs Farm close to the watercourse on the southern side of the A1094 and to alleviate flooding to the road itself. The “ponding field” acts an attenuation area and floods in times of heavy rainfall. Therefore the increase in the total amount of water discharged by SPR and NG from the hard-surfacing of the substation sites will increase flooding in the “ponding field”. The aim of the works carried out by the EA in 1993 was to alleviate flooding in the village and SPR’s proposals are in direct contravention of this aim. *[Reference 3a – location map of weir and ponding field; Reference 3b – end of watercourse at attenuation area; Reference 3c- dam at A1094; Reference 3d – weir and culvert under A1094]*
14. Suffolk County Council have recently commissioned a Surface Water Management Plan as a result of flooding which occurred in October 2019. *[Reference 4 – photographs taken by Mary Shipman on 6/10/2019)*. We had however suffered several worse flooding events prior to this, notably in 2016 when we made a Flood Report to Suffolk County Council after water entered our house.
15. In the Onshore Substations’ site, there is a large wooded pit, which has an important role in surface water management and protection of the village from flood. It is proposed that this pit be built over by the EAN1 substation. This pit fills with water in winter and there is a large field drainpipe which discharges into it, which is likely to connect to the field drainage network which currently exists over the site. This will mean that the run-off from the site will not only be increased by the large areas of hard-surfacing but also because an existing water storage area will be lost by the development. *[Reference 5 – photo of flooded pit in winter]*.
16. SPR have not produced any details or calculations of the existing run-off from the fields nor the increase which will result from the hard-surfacing of the substations site, access road, car-parking areas. It will also be necessary to factor in the Construction Compounds and other areas in use during construction. The fact that the NG substation, if built, is likely to be extended further by connections offered to Nautilus, Eurolink and the other proposed energy projects and this should also be taken into account. Flooding is one of the major issues facing the residents of Friston and for this not to be properly considered in the DCO process is scandalous and dangerous for local people. It is imperative that flooding is dealt with in detail and fully considered during the Examination and SPR put to task on this.

Ecology

17. The wooded pit also provides a habitat for wildlife and for many years there have been badger setts close to the rim of the pit, which will be destroyed due to the development of the substations, specifically EA1N. The pit is also a bat roost as identified in SPR's ecology survey as site 27.6a in Figure 22.7 and Appendix 22.6. The wooded pit is a unique, undisturbed place which functions both as an attenuation pond for the village as well as a habitat for a range of wildlife including small mammals and birds. Every effort should be made to protect it from development and destruction. [*Reference 6 – 2 photographs of badger setts in the pit*]
18. The noise and lighting during construction and operation of the substations will deter wildlife, including birds, bats and small mammals. The substations site is favoured by skylarks, who will only inhabit quiet and peaceful countryside and are a joy to experience.
19. SPR have identified the existence of a Lesser Horseshoe Bat in the area of Billeaford Hall, Sloe Lane, Knodishall IP17 1UU. The cable route passes very close to this location as do two Pre-Construction accesses shown on Sheet 6 of SPR's Works Plans, although Billeaford Hall is not identified on this map and is partially obliterated. Billeaford Hall can however be seen on the Works Plans Key Plan (*Reference 7- detail from Works Plan Key Plan*). Billeaford Hall functions as a Coastal Retreat and is currently well-suited to nature lovers, see <https://www.billeaford.com>. Any disturbance to wildlife in this location, and particularly for the extremely rare Lesser Horseshoe Bat, is to be strongly discouraged and deserves fuller investigation.

Footpaths

20. As dog-owning residents of Friston, we rely on the circular walk of approximately 3 miles around the substations site on Footpaths 6 and 17 for daily exercise. This is a very peaceful off-road route much used by other dog-owners in the village (of which there are many) and was a godsend during the Coronavirus lockdown for all residents.
21. SPR propose that Footpath 6 be extinguished due to the construction of the substations and replaced by a much inferior route running adjacent to Grove Road and close to the substations themselves. This will be most unattractive and potentially unsafe to dog-walkers being so close to the road and suffering from noise from the substations.
22. The peace and tranquillity of FP17 will also be adversely affected by the substations site, being adjacent to and crossing the permanent access road and close to the substations themselves. This is a very serious loss of amenity to the village and it is not clear how this footpath will remain open during construction. Footpaths 6 and 17 are by far the most popular walk in Friston as other routes do not offer the same degree of tranquillity or are not circular.
23. Land to the south of the village is of inferior quality, being Grade 4 Agricultural Land. For some years now the fields in this area have been used extensively for pig farming. The pigs strip the land of vegetation, causing dust to be blown about, and farm machinery also churns up footpaths. The pigs are kept within low-level electric fencing, meaning that it is impossible to let dogs off lead. For this reason the southern part of the village is rarely used as a leisure facility for village residents.

24. Footpath 6 is also a historic route having been both a Parish and a Hundred boundary and a retired Rector of Friston remembers seeing a map showing it as a Pilgrim's Way. These historical connections should be properly investigated and preserved, not lost for ever. Travelling south on Footpath 6 also offers sweeping views of the countryside and the village itself, particularly of the Grade II* Listed St Mary's Church and the loss of the footpath therefore affects the setting of the Listed Building. (*Reference 8 – view of Church from Footpath 6*)
25. There is a long-distance path known as the Sandlings Walk, which follows Footpath 2 heading east from Friston off Grove Road. This footpath will be disrupted and diverted by the cable corridor/haul roads serving the substations site which are 9M wide for this section. This will mean that a useful connection between the villages of Friston and Knodishall will be lost for a considerable period and will also be a deterrent to users of the long-distance path. (*Reference 9 – Location of Sandlings Walk along Footpath 2*)
26. As Friston residents we also use other footpaths and bridleways in the area for leisure purposes. Visitors are also drawn to the area for its wealth of open access and network of footpaths, which can provide much pleasure. A total of 26 other Public Rights of Way will be temporarily closed or diverted for unknown lengths of time. This is a substantial loss of amenity to residents of the area and will deter visitors, who are an important part of the local economy.

Heritage Assets

27. There has been very little change to this area of Friston for centuries and the five Listed Buildings directly affected by SPR's proposals sit within their original settings. These are:-
- a. Parish Church of St Mary (Grade II*)
 - b. Friston House (Grade II)
 - c. High House Farm (Grade II)
 - d. Woodside Farm (Grade II)
 - e. Little Moor Farm (Grade II)
28. The Parish Church and the Churchyard in particular must be afforded protection, as its use is sensitive to noise and vibration. The north door (now blocked) dates back to the 11th century and other parts to the 12th century. There are spectacular views of the surrounding countryside from the top of the Tower, which can be accessed internally. The substations would completely ruin this view and therefore the setting of the Listed Building. [*Reference 9 – photo of the substations site from the Church Tower*]. The haul road and cable route would also be highly visible from this location.
29. The Church can also be seen from a considerable distance on Footpath 6, which will be lost to the substations' development. There are currently constant views of the Church on this footpath southwards from Little Moor Farm and it is easy to imagine pilgrims and visitors from other parishes being drawn to Friston by the sight of the Church. This piece of history and the Church's setting should not be lost. [*Reference 10 – views of the Church from Footpath 6*]
30. It is also possible to see the Friston Post Mill (Grade II* Listed) from the substations location and again it must have been a landmark to people travelling this route south. The

Mill was re-located from Woodbridge to Friston in 1812 and is over 15M high. [Reference 11 – *Friston Post Mill from the substations site*]. Again, the setting of this important Listed Building should be preserved.

31. The three Listed farmhouses still sit in their agricultural settings and the introduction of the substations' development would completely change this, whether or not trees are planted. Like all Listed Buildings, there are restrictions on what works could be done to improve their sound insulation and being so close to the substations site will cause problems with noise. For example, Woodside Farm has the original metal framed windows, probably made by the local blacksmith, which are notorious for being badly fitting. (We had these windows in our own house but luckily it is not Listed and we were able to replace them with timber windows). Friston House has huge beautiful sliding sashes with very early glass and it would be very damaging even to put secondary glazing internally.

Noise

32. The proposal is to use a baseline limit of 34DB at only two locations, these being Woodside Farm and Little Moor Farm. There is in fact a residential property that is closer to the substations site, being Woodside Cottages in Grove Road. No resident of Friston should be subjected to noise, whether inside or outside of their homes.
33. We believe that SPR have understated their noise calculations and in particular by not taking account of tonality, which should carry a penalty. Friston is a very quiet rural location and at night time the noise levels are very low, meaning that the perception of noise of the substations will be much higher.

Loss of good quality agricultural land

34. Of all the eight sites considered by SPR during the consultation process, only Site 7 (Friston) and Site 6 (Knodishall) are in Grade 2 agricultural land. The remaining six sites are in Grades 3 and 4 agricultural land or in non-agricultural use. The hierarchy of agricultural land was not properly taken into account in the site selection process and not reflected correctly in the Red Amber Green Assessment. (Reference 12 – *Classification of Agricultural land Figure 21.3 of Chapter 6.2.21.3 and Onshore Substation Options Figure 3.2*). This is contrary to Policy 5.10.8 of EN1 in directing development away from the highest grades of agricultural land as defined below:-

5.10.8 Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations. Applicants should also identify any effects and seek to minimise impacts on soil quality taking into account any mitigation measures proposed. For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination.

Conclusion

35. The Applicant has made a flawed decision in choosing Friston as a site for SPR's two new substations and that for the National Grid substation, which is planned to be a new hub where further projects will connect. The site is extremely close to a small rural village, which will be blighted for the lifetime of its residents and perhaps longer.

36. The Applicant has failed to fully and properly assess Cumulative Impact of the many other energy projects which are planned for this part of the Suffolk Coast. SPR have also failed to properly consider the effect of the traffic generated by multiple projects, and in particular Sizewell C, on the rural road network, when they are planned in a similar timeframe.
37. The Applicant has clearly failed to follow Government Policy, and specifically EN-1, with regard to flooding and agricultural land classification in its site selection process. SPR have also failed to properly consider the impacts on Public Rights of Way and the settings of Heritage Assets. The Applicant has also understated the impact of noise and harm to the landscape in the surrounding area.
38. Other sites are available to the Applicant and National Grid, and we would ask that the Examining Authority to reject these Applications.

Reference documents appear on the following pages

Reference 1

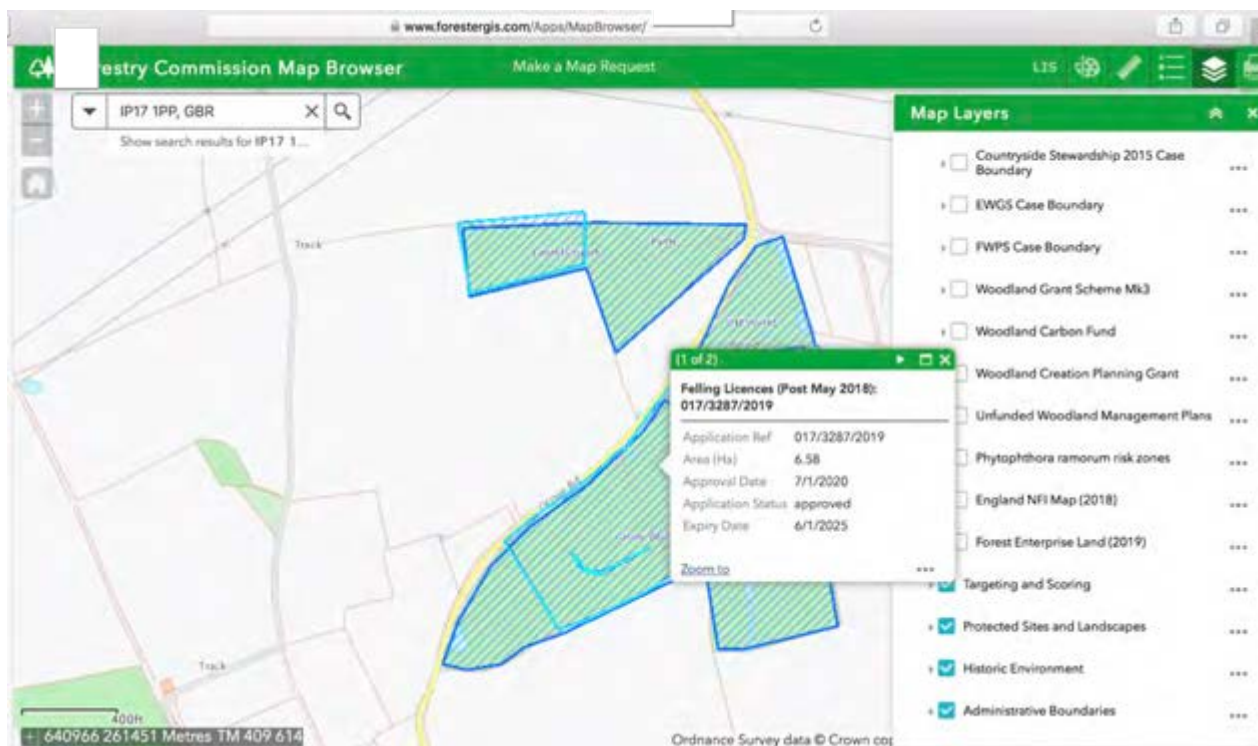
- a) Flooded field where Haul Road/Cable Route crosses Grove Road, Friston – October 2019



- b) Grove Road (looking south), Friston – flooding October 2019



Reference 2a: Screenshot of Forestry Commission's website showing Felling Licences for Grove Wood and Laurel Covert



Reference 2b: Photo of part of Grove Wood after felling May 2020 (note conifers in background are also scheduled for removal)



Reference 3a: The Friston 'Main River' south of the village near the A1094.

Google Maps aerial photograph annotated to show cessation of watercourse into attenuation area ("ponding field") plus dam and weir adjacent to A1094 & culvert/ditch extending further south to Firs Farm



Reference 3b: End of watercourse at attenuation area ("ponding field") viewed from South



Reference 3c: Dam between attenuation area and A1094



Reference 3d: Weir and culvert under A 1094



Reference 4: Photographs taken in Friston on 6 October 2019 by Mary Shipman

- a) Newton House, Church Path (our property) adjacent to Friston Watercourse culvert under Grove Road



- b) Grove Road



c) Culvert at Grove Road



- d) Adjacent to Watercourse on Church Path (Village Green beyond). Note flow and depth of water in ditch



- e) Low Road showing watercourse overtopping



f) Grove Road at junction with proposed Pre-construction Access (Footpath 2)



Footpath 2 (Pre-construction Access)

g) Flooding on tight bend in Grove Road



h) Flooding in Grove Road (looking south towards junction with B1121)



Reference 5: Flooded wooded pit in Winter (taking field drainage) at Substation Site (EA1N)

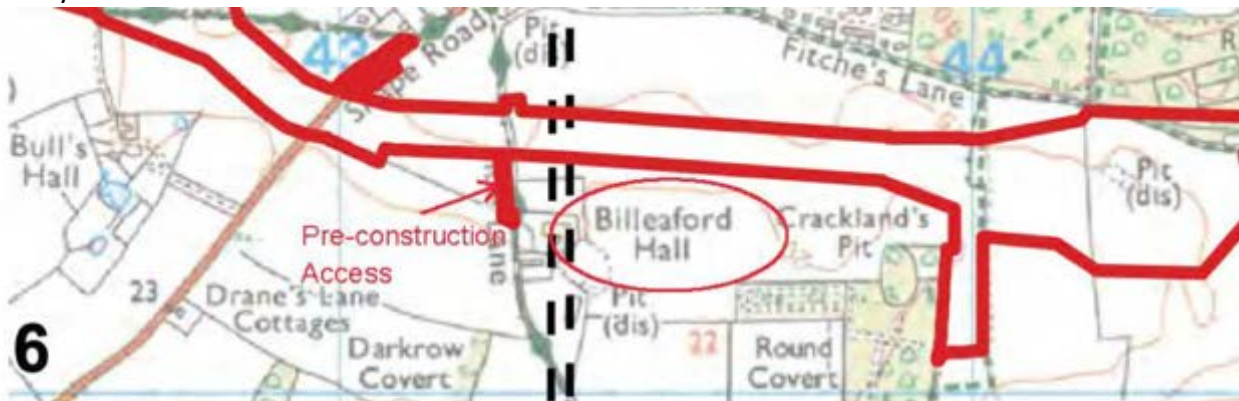


Reference 6: Badger setts near rim of above pit in Spring 2020 – to be destroyed by construction of substations (two photos)





Reference 7: Detail from SPR's Works Plans Key Plan identifying Billeaford Hall, Knodishall, where the Lesser Horseshoe Bat has been recorded. Note the cable corridor and pre-construction access is nearby.



Reference 8a: St Mary's Church, Friston, from Footpath 6 adjacent to Little Moor Farm



Reference 8b: St Mary's Church from proposed substation site on Footpath 6



Reference 9: Long distance path “Sandlings Walk” – Snape to Sizewell section. Note this route follows Footpath 2 from Friston to Knodishall and will be disrupted by cable route.

