

# WRITTEN REPRESENTATION FOR SPR EA1N and EA2 PROJECTS (DEADLINE 1)



## HUMAN HEALTH

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

**Date:** 2 November 2020

**Issue:** 5

### SUMMARY

1. We wish to bring to the examining authorities attention to a range of health and well-being impacts which we consider have not been given due attention by Scottish Power and which must be acknowledged and more importantly addressed as required by EN-1 and in particular Section 4.13.
2. A considerable strength of this area is its social fabric which is seriously undermined by the proposals and exacerbated by the cumulative impact of the other projects planned for this area.
3. High levels of anxiety and stress are caused by:
  - Fear of the unknown and uncertainty – comprehension of the magnitude and scale of the proposals.
  - Lack of trust in the processes, site selection; lack of community engagement and communication; ability to deliver in a timely and sensitive manner.
  - The need for robust code(s) of practice for the project execution, monitoring and disputes' procedures.
  - The proximity of these projects to the social and spiritual hubs of the village of Friston.
4. The impacts on human health and well-being are not 'insignificant' and far from 'negligible' for the community, not least those of mature age and facing their final years with major disruption and uncertainty. They undermine the social and economic fabric of the community which is contrary to S8 National Planning Policy Framework Government Planning Policy, February 2019 in promoting healthy and safe communities. In addition, we draw attention to the report, 'The state of the environment: health, people and the environment' published by the UK Environment Agency, September 2020.
5. It is quite apparent that great swathes of the DCO Applications have been written by consultants/authors in far off parts with little or no comprehension of or care for the local environment, its characteristics and its fragility. Human issues seem to have limited importance within the examination process and this may account for a sense of complacency. Certainly, what is written comes over as hugely insensitive to the real uncertainties that communities face and the anxiety and stressed caused which has already had a serious impact over the last two years, will continue for the next year and, if consent is granted for the projects, will continue for decades given all the other energy projects which will inevitably connect at or near to Friston and the inadequacy of the mitigation proposed.

6. Further details of the village of Friston, its demographics, housing and facilities are set out in Appendix 1.

## **UK GOVERNMENT PLANNING POLICY GUIDANCE AND HEALTH ISSUES**

7. Protecting the considerable community strengths of this area is integral to meeting the National Planning Policy Framework as presented to Parliament by the Secretary of State for Housing, Communities and Local Government, February 2019 and specifically Section 8: Promoting healthy and safe communities which includes the following objectives.

- Promoting social interaction (strong social fabric), street layouts that allow for easy pedestrian and cycle connections.
- Safe and accessible – pedestrian routes and quality public spaces.
- Enabling and supporting healthy lifestyles (safe and accessible 'green' infrastructure).
- Provision of social, recreational and cultural facilities.
- Improving health, social and cultural well-being.
- Guard against the unnecessary loss of valued facilities.
- Ensuring established shops, facilities and services are able to develop and modernise
- Promoting education opportunities.
- Public safety.
- Access to a network of high-quality open spaces and opportunities for sport and physical activity.
- Protecting and enhancing public rights of way and access.

8. In September 2020, the UK Environment Agency issued an extensive report:

'The state of the environment: health, people and the environment'.

This report is relevant since it focuses on health issues to which the Friston and communities along the cable route will be exposed during construction and to a lesser extent at Friston post-construction.

It is also relevant in that it highlights the importance of preserving 'green space' as an amenity and presents opportunities for increasing this area's appeal through caring environmental management. Main findings are:

- Air pollution is the single biggest environmental threat to health in the UK, shortening tens of thousands of lives each year.

- After air pollution, noise causes the second highest pollution-related burden of disease in Europe, and is responsible for more life years lost than lead, ozone or dioxins.
- There is emerging evidence of health effects from lower levels of pollution, although these are not currently well understood.
- Antimicrobial resistant microbes are becoming more common in the environment due to contamination, meaning infectious illnesses may become harder to treat.
- Mental health conditions are increasing – they are the largest single cause of disability in the UK, and can be caused or affected by pollution, flooding and climate change.
- There is substantial and growing evidence for the physical and mental health benefits of spending time in the natural environment, but children are engaging less with nature.
- Exposure to pollution, and access to the natural environment are not equally distributed across society – people living in deprived areas often have poorer quality environments with less accessible green space.
- Equality of access to, and connection with a healthy natural environment would save billions of pounds in healthcare costs and reduced economic activity every year.
- There are opportunities to improve health through the choices government, regulators, businesses and individuals make in creating and contributing to healthier, greener and more accessible environments.

## **FEAR OF THE UNKNOWN**

9. There have been no computer-generated images of the overall scale of the infrastructure proposed at the onshore site at Friston. Unless you have visited the Bramford substations near Ipswich and happened to see the construction consolidation site for EA1 at Woodbridge/Martlesham, there will be little comprehension (given an inadequate consultation exercise) of what is going to materialise. Nobody around here has encountered landfall entry points, cable corridors, construction consolidated sites and substations.
10. And for how long? The DCO suggests a construction period of up to four years, but does that include pre and post construction activity and then how are EA1N and EA2 to be sequenced?
11. Much of this will overlap with construction activity for Sizewell C, a 9-12 year project and there are the impacts of the other projects – see written representation concerning cumulative impact.

## **LACK OF TRUST**

12. The overriding impression is that the choice of site is driven by miscalculations in Scottish Power's original applications (see Written Representation concerning site

selection), speed and financial expediency on the part of the Scottish Powers rather than any innate concern for meeting the Government's climate change policies.

13. The Scottish Power talks about the importance of communication as a means of mitigation but has done little to address local issues. For example, the last contact with Friston Parish Council was in July 2019 when substantial concerns were identified but have not been addressed in the DCO; flood risk was a key component of that - see Written Representation concerning flood risk.
14. This lack of engagement spills over into a lack of trust in Scottish Power's ability to deliver the projects, if approved, in a timely and sensitive manner.
15. There should be fewer 'subject to consent' actions GIVE EXAMPLES and these should be formally documented, monitored and enforced.
16. The Code of Construction Practice which is to be approved by the local authorities should involve consultation with Friston Parish Council so that the community's issues can be properly addressed – see Written Representations on construction and the draft development consent order.

## **AIR QUALITY**

17. We remain concerned at the potential impacts of traffic emissions along the A12 corridor particularly at known AQMBs at Stratford St Andrew and Woodbridge noticing increasing traffic volumes since the partial relaxation of the Covid-19 lockdown. These are certain to increase with the overlap with Sizewell C construction traffic.
18. The cumulative effect of traffic and machinery emissions along the cable route and at construction consolidated sites all of which pass close to residential areas, care homes and a school.
19. These apply also to the substation site at Friston.
20. The above applies equally to dust. It is an exceptionally dry area and subject to high winds. These have become more prevalent and in Summer 2020 led to dust storms which drew protests to landowners, local authorities and the Environment Agency.
21. See in greater detail Written Representations concerning Traffic and Transport and Construction.

## **FLOOD RISK**

22. This is set out in greater detail in the Written Representation in respect of Flood Risk.

## **LANDSCAPE FOOTPATHS & LAND USE**

23. There is a serious loss of amenity and of high quality open space as result of landscape damage, permanent and temporary diversions of footpaths and the large tracts of land

which will be used for the development of the projects and proposed “mitigation” – see Written Representations in respect of Landscape, Footpaths and Land Use.

## **ECOLOGY & ONSHORE ORNITHOLOGY**

24. The natural environment and local ecology is a key amenity. It is an important factor in people choosing to live in this area and the acknowledged damage to it will reduce people’s quality of life and wellbeing – see Written Representation concerning Ecology.

## **ARCHAEOLOGY AND CULTURAL HERITAGE**

25. The listed buildings in and around the village of Friston hold great value for the community and the Parish Church in particular is a key part of community life not only through its spiritual contribution but the many events which take place throughout the year which are related to the church including Christmas festivities, the Village Fete, the annual “Classics on the Green” fundraising event, which is attended by many hundreds of people, the annual Open Gardens fundraising event amongst others. These factors are specifically acknowledged in EN-1 paragraph 5.8.12 and 5.8.13. The prolonged construction period and operational impacts of these projects will cast a long shadow - see Written Representations concerning Cultural Heritage.

## **NOISE**

26. Scottish Power completely misunderstands the quietude of the locality and the impact on residents – see Written Representations concerning Noise.

## **TRAFFIC AND TRANSPORT**

27. There are major concerns at traffic volumes, emissions, noise but most of all road safety – see Written Representation concerning Traffic and Transport.

## **SAFETY**

28. The projects will involve a significant safety risk to the community – see Written Representations concerning Safety.

## **PROXIMITY TO THE VILLAGE COMMUNITY OF FRISTON**

29. All the concerns raised in the above are magnified by the site being just 250 metres away from the social and spiritual hub of the village. It is just two minutes’ walk away!
30. The worst of the cumulative effects are borne during the extended construction phases when the works extend down to Church Road – see Written Representations concerning Construction.
31. But there will be a legacy of alterations to the character of the area which are unknown.
32. Consequently, lives have already been damaged by individuals’ and families’ concerns for the future and the high levels of anxiety namely:
- a. Those whose homes face directly the development site and have been carefully maintained and refurbished to complement the rural landscape.

- b. The intrusion of increased traffic flows through the narrow lanes of the village; not just contractors' vehicles, but those seeking alternative routes to avoid delays and congestion elsewhere and these in turn cause safety fears.
  - c. Restrictions on ability to walk around the village, compounded by the closure of footpaths restricts physical activity, social interaction and wellbeing.
  - d. Potential for crime drawn to construction sites.
33. Future of the Village Green – privately owned and leased on short term of seven years to the Parish Council. This has been extended to ten years to allow for the installation of new play equipment. It is the recreational hub of the village with its own beacon, netball and soccer facilities for the young. It provides temporary parking for events. The lack of security of tenure is exacerbated by concerns for the future of the village.
34. There are fears that the proposals and cumulative effects may damage the viability of The Old Chequers public house, a key social hub within the village and popular with visitors.

#### **IMPACT ON VILLAGE SUSTAINABILITY**

35. Demand for people to wish to live in the village. Threat to property values already suffered by those facing the site. The village needs a regular flow of younger new residents to help support its institutions
36. The village hall is integral to the social life of the village being used for village meetings and societies - book club; fitness classes; Baptist Youth Club; Parish Council and Parochial Church Council meetings; weddings and funerals; concerts and performances and whose facilities support other community events, namely those of the Church.
37. After several desperate years the Church has become self-supporting through its pastoral care and outreach to the community which extends outside the village to the whole of East Suffolk.
38. The Old Chequers public house at the centre of the village is currently well managed by the landlords and valued by the village and attracts necessary visitors for its hospitality and product range. Its facilities and offering complement and benefit village events and contributes to the economic sustainability of the village.
39. Any of the above are serious issues impacting on people's health and mental wellbeing, albeit to varying degrees but certainly not negligible or insignificant and not temporary least of all when assessed cumulatively.
40. They also adversely affect morale and commitment which can destroy the social fabric of a community.

#### **POTENTIAL FOR MITIGATION**

41. To what extent can measures for compensation and mitigation address these issues?  
These are not temporary but potentially everlasting.
42. Addressing human health – anxiety giving rise to tensions and friction; loss of recreational facilities especially walking and cycling routes. An ageing and potentially more isolated community subject to increasing and extended period of noise, pollution.
43. Parish Nurse Scheme shared with adjoining villages?
44. Accessibility to and support for social transport schemes (Coastal Accessible Transport Services).

**Safety:**

45. Village traffic plan to control/accommodate increase in volumes
46. Speed control along Aldeburgh-Saxmundham Road and by roads.  
But how can these be executed and enforced? The lanes will be exploited by drivers seeking short-cuts?
47. Provision of new and additional public parking area(s).

**Preserving community life:**

48. Protection of Church Road as access to properties, village hall and church. .  
Protecting the peace and tranquillity within the village, especially the Church given its responsibilities.
49. Refurbishment of the village hall.

**Construction Period to include other projects in the pipeline and Sizewell C:**

50. Construction Code of Conduct to address construction programme and sequencing.
51. Responsibilities of Developers and Contractors – planning, control and monitoring; disputes procedures to include allocating responsibility and accountability for arbitration, resolution and implementation.
52. Defined village maintenance programme to include pavements, footpaths, ditches and hedgerows.
53. The sole mitigation offered by Scottish Power – planting trees as screening which even if they grow will take at least fifteen years to mature and a replacement circular footpath around the industrial site are just insulting and take no consideration of the needs of the village.

## APPENDIX 1

### VILLAGE PROFILE

1. There are 190 residential properties within the village catchment area most affected by the proposals

2. The estimated split is:

|                         |                   |
|-------------------------|-------------------|
| Village residencies     | 135               |
| Weekend/Holiday homes   | 21                |
| Investment/Holiday lets | 31 (all occupied) |
| Vacant                  | 3                 |

3. Non-residential properties are:

The Church of St Mary the Virgin (Grade II\* Listed)  
Village Hall  
The Old Chequers Public House  
John Balls Garage  
Friston Baptist Church  
Friston Post Mill (Grade II\* Listed)

Outlying properties in the Parish of Friston have been excluded.

4. The population split is estimated:

|          |           |
|----------|-----------|
| Over 65  | 137 (56%) |
| Under 65 | 107 (44%) |

of which:

30 (12%) live alone

34 (14%) are considered as vulnerable in view of age, limited mobility and/or underlying health problems. However, depending on the construction period more of those over 65 will move into the vulnerable category

5. Friston has shared in the desirability of this area as a place to live and visit owing to its central position close to the towns of Aldeburgh, Saxmundham and Leiston with their shops and facilities, the international arts centre at Snape Maltings and accessibility to the many and diverse recreational facilities of the East Suffolk Coast.



6. This has resulted in a regular inward flow of new residents who engage in the local community together with inward investment through refurbishment of existing properties and infill building.
7. The population is cohesive as well as independently minded. This is most evidenced in the response to Covid-19 which has led to the establishment of a village help-line. But also, in the sustainability of the village institutions.