



SPR EA1N and EA2 PROJECTS

DEADLINE 2 - COMMENTS ON PUBLIC RIGHTS OF WAY CLARIFICATION NOTE

Interested Party: SASES PINS Refs: 20024106 & 20024110 Issue: 1

Title of submission/topic	Relevant content reference	SASES comment
Impact Assessment	Numbered para 11 LVIA and Human Health	SPR refer to the potential loss of visual amenity and potential indirect impacts on Human Health. Neither of these issues has been properly explored in SPR's submitted documents. There are no visualisations of views from any of the proposed new footpath routes and no proper account has been taken of the effect of the loss of a large part of the footpath network on human health.
Overview of Human Health Chapter 27 Page 9	Construction Impacts Quote "In assessing the sensitivity of the local population, there is a higher proportion of older people than the national average but they are also relatively less-deprived and have a high proportion of car ownershipand would temporarily use another location, thus their health would not be affected."	This is a dreadful assumption to make. By no means do all local residents have cars or the ability to drive, nor should people be expected to drive to another location. The existing circular walk to the north of Friston is very well used by local residents, including many dog-owners, and its complete loss during the construction period is unacceptable and a major loss of amenity. Further there are residents who own a number of dogs, for whom a journey in a car is not practical. Nor is it in the interests of human health in terms of emissions to encourage car use. The nearest walking area to Friston is Snape Warren (With very limited parking)(With very limited parking), which is an SSSI and it is not desirable to encourage more people to use this area. It is clear that the health of residents, including the elderly, will be adversely affected. Given the uncertainties over the construction period the use of the word "temporarily" in terms of using another location is inaccurate particularly if the

	Mitigation "For PRoW which will be permanently stopped up, the existing PRoW cannot be extinguished until the relevant high authority confirms that the alternative PRoW has been created to the standard defined in the final PRoW strategy."	projects are built sequentially with a gap in construction. This could be a period of 7+ years. The Applicant has not explained how this mitigation can be achieved. It is not possible to complete the alternative route until the substations have been constructed and the haul road and CCSs removed. Meanwhile it is impossible to see how PB1(FP6) can remain open for use as it runs through the middle of the substation buildings. This mitigation is not achievable as written.
Page 10	Operational Impacts	The Applicant acknowledges that the potential impacts on health but say the same principles as for construction apply. This is not logical – does the Applicant mean that car usage should continue?
		It is clear that the proposed new alternative route is much inferior to the existing PRoW network and that tranquillity and visual experience will be severely adversely affected.
	Cumulative Impacts	The Applicant assesses the cumulative impact with Sizewell C to be not significant. The Applicant has failed to consider the impact of up to six further projects, which are due to connect to the NG substation at Friston. There has been no assessment of how long the haul road will remain in place, either for the SPR projects, or potentially for other projects, such as Nautilus, Eurolink, Greater Gabbard, Galloper and other interconnectors or the effect of the necessary extension of the NG substation on the PRoW network.
Page 14	The visual relationship between	The proposals destroy this visual relationship and the former Parish/Hundred
LVIA	Fristonmoor, the village and Church and through PRoW network. Viewpoints selected.	Boundary, which is a Heritage Asset, and also harm the setting of the Church. This is acknowledged by the Applicant in the SoCGs. There are no viewpoints provided from the new alternative PRoW network nor has the Applicant provided

		visualisations of 3 viewpoints on the existing footpaths requested by the ExA in their First Written Questions.
Page 16 – 18	Onshore Cable Route	The Applicant acknowledges significant impacts on views on the Sandlings Walk
LVIA	Onshore Substation	but has failed to address the significance of its proposed use of the Sandlings Walk (FP2 heading east from Grove Road) as a pre-construction access. This is a serious Health & Safety issue which must be dealt with.
		The Applicant acknowledges that there will be significant visual effects on people walking to the north of Friston between Friston and Fristonmoor. The Applicant has however not explained how it will keep this route open, given that FP17 crosses the proposed permanent access road and is subject to Temporary Occupation and Rights for drainage from the proposed SuDs basins.
		The Applicant relies on over-optimistic growth rates of planting to reduce the impacts on the PRoW network. See Jon Rose Associates report submitted by SASES at Deadline 1. Viewpoint 2 near Church Road however shows there will be significant visual effects even after 15 years of optimistic growth.
Page 19	Onshore Cable Route/Cumulative impacts	The Applicant acknowledges there will be cumulative impacts on users of the Suffolk Coast Path over nearly 7km from Thorpeness to Dunwich Heath. This is an extremely well-used route for both residents of the broader local area and visitors alike and its use will be substantially discouraged by views of CCSs, plant and equipment as well as by disturbance to the surrounding landscape.
		Impacts on the Sandlings Walk are also significant with a total of over 11km affected. This includes 3.5km from Friston to Sloe Lane (FP2) causing further loss of amenity to Friston residents, who will also be impacted by loss of PRoWs on the substation site. Effectively there will be no pleasant or useable footpaths to the north or east of Friston village.
		The Applicant also acknowledges the impact on users of the Suffolk Coastal Cycle Route (see SASES WRs submitted at Deadline 1)

Page 20 Tourism, Recreation and Socio Economics	The Applicant states "Recreational assets are moderately important for local users but individually they are not nationally significant enough to draw tourism visitors".	This is incorrect. Footpaths are very important assets for most of the local population and are part of the reason they have chosen to live here. Footpaths cannot be assessed individually as it is the whole network of footpaths in this part of East Suffolk which is a draw to visitors. The area is well known nationally (at least throughout south-east England and the Midlands) for this particular form of outdoor activity.
Page 21	Operational Impacts – the Applicant states "the density of tourism receptors with viewpoints of the substations is very low and evidence shows that the presence of electrical infrastructure does not change recreational users' behaviour."	cottages to let and also second homes. This is important to the village and supports the local "Chequers" public house/restaurant. The large number of holiday lets and second homes also provides local employment to builders, decorators, cleaners, gardeners etc. There is also holiday accommodation at
Page 22 Summary		SASES notes that the Applicant recognises that after a 15 year period the residual impact on the PRoW network in Friston is still significant. SASES questions why the Friston site was selected when the other 7 shortlisted sites did not involve any extinguishment of Rights of Way.