

**From:** [REDACTED]  
**To:** [East Anglia ONE North; East Anglia Two](#)  
**Subject:** Responses to ISH 1 & 2 - Friston PCC 20023636 & 20023639  
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Dear Mr Smith and colleagues

Attached are the responses of Friston Parochial Church Council to matters arising out of the initial issue specific hearings.

We hope these are self-explanatory. They may be repetitive but reflect the ongoing concerns and emotions.

I would personally emphasise our appreciation of the care and understanding shown by all so far - you will appreciate emotions are running high, exacerbated by the covid restrictions, so your patience is appreciated.

Yours

Simon Ive

Secretary and Treasurer, Friston PCC

Pins Refs: 20023636 and 20023639



**FRISTON PAROCHIAL CHURCH COUNCIL**  
**RESPONSES TO ISSUE SPECIFIC HEARINGS 1 & 2**  
**SPR EA1N & EA2 PROJECTS (DEADLINE 3)**  
**PINS REFS: 20023636 & 20023639**

**INTRODUCTION**

We wish to first place on record our appreciation of the members of the Examining Panel and their colleagues for the courteous, sympathetic and patient managing of the process so far and responding to our concerns for representations.

We appreciate the challenges you face in managing the process in these difficult circumstances of Covid-19 restrictions.

And so, it is especially difficult for our community wrestling with a development they never expected to face and the complexities of which extend beyond most peoples' understanding in a demanding timetable. This at a time when we are heavily restricted and are unable to communicate effectively amongst ourselves.

The first series of Issue Specific Hearings were important for local community groups and their representatives to not only summarise their concerns and objections but for the residents to obtain a more complete perspective of the proposals and the Planning Process. Concerned for the pastoral care and well-being of our community, our church e-mailed residents and supporters to obtain reactions. There was a substantial wide-ranging response. Whilst some concerns have already been expressed in our previous written representations, their gravity and importance and the emotions generated need to be emphasised again.

**SUMMARY**

Our concerns remain:

- The irreparable destruction of the association of our community and church with the landscape which has existed over 1,000 years.
- The need to assess the proposals in relation to developing government 'green' policies and evolving technological advances.
- A continuing failure to understand the site selection as presented by the developer.
- The developer's lack of sensitivity and understanding of the characteristics and dynamics of the area.
- Their failure to address in depth the cumulative impacts of other energy projects, not least Sizewell C.
- Concerns for project organisation and control.
- The lack of involvement of National Grid and its associates seemingly in contravention of NSIP planning guidelines.
- Unsubstantiated employment claims and failure to address the impact on the local visitor economy.
- Specific Friston concerns relating to landscape, heritage, construction and lack of mitigation.



We shall return to these and health implications following subsequent hearings.

### **APPEAL FROM THE RECTOR, REV'D MARK LOWTHER**

The freedom for those who live in Friston to visit, pray and worship in their parish church is vitally important – indeed it may even be seen as a right. Anything that impedes that freedom must be resisted at all costs. As I understand it, when the glebe land on Church Road was sold to its current owner it had a restrictive covenant attached that guaranteed uninterrupted access to St Mary's Church. That covenant would obviously be breached by SPR and NG's current plans. But over and above that anything that restricts access to the church building, either during construction or operation of the substations, or changes the 'condition' of the church building itself (by creating continuous industrial noise of any kind, for example) needs to be brought to the attention of the planners.

The church should remain a place of tranquillity, just as it is now and has been for hundreds of years. As such it is a vital resource for the people of Friston village. That resource must not be taken away.

### **MESSAGES FROM VILLAGE RESIDENTS**

'Despite their blandishments and PR releases, their (SPR) motivation is gain at the expense of others, and that sits uneasily with the ethos of the Church whose basic message is **'love one another'**. Nowhere in their multitudinous pages is there a grain of humanity: every human-centred concern is treated with a mechanistic approach, with the clear aim of reducing those concerns to 'negligible impact' or very occasionally, 'minor adverse'.

'If SPR/NG want the Friston site because it is 'cheaper', that is an unethical stance because it ignores the costs inflicted on the residents of East Suffolk (especially of Friston and the connection corridor) and also those who work here and have holidays here. Then there are the cultural/heritage costs of damage to the environment and society'.

### **NATIONAL, LOCAL AND CORPORATE GOVERNANCE**

#### **NATIONAL**

Policy for NSIPs is governed by principles set out in EN-1 but these date back to 2009 and since then the Government has furthered developed its thinking and policies on the 'green economy' (including preserving green spaces) and the two are no longer aligned.

In addition, developments and technologies within the energy sector and in particular renewable energy have expanded as have the number of renewable energy projects proposed for this area, along with Sizewell C where the Government has expressed commitment. Accordingly, the interrelated and cumulative impacts of these should be assessed in detail.



## **LOCAL**

These all have major impacts on the plans of local authorities and their capacity to deliver the services demanded of them. They are, however, obliged to 'engage' with the developers and then become complicit in the uncertainties and confusion. It is difficult to envision the consequences for a balanced economy and social fabric.

## **CORPORATE**

Developers will have social responsibility policies but these will be subject to their commercial and investment aims. We do not expect too much of them but they will in turn seek to gain public acceptance through emphasising their role in renewable energy projects and related socio-economic benefits. Accordingly, these should be assessed and challenged.

## **PLANNING AND SITE SELECTION**

We have difficulty in understanding how the current issues have arisen?

The licence for the developer was granted in 2010.

- Why, therefore, did it take to 2017 to identify what we consider to be a material change in the need for a new connection point at Friston?
- What is the justification for a development of this size to accommodate a connection point for a minimal proportion of the UK energy needs and irreversibly destroy the local environment and heritage?
- The footprint and scale of the development seemingly is not justified to accommodate the connection required and could be accommodated at Bramford as originally intended and where there is capacity to expand. That site is well away from the village with a sizeable wood and fields between them. It is also closer to the 'supply chain'.
- Why was the site selection process limited to this area of the Suffolk Heritage Coast and not further inland to avoid invasion of areas of AONB, Special Scientific Interest, Special Interest and proximity to residential areas?
- As described by SPR, it seemed a desperate attempt to find a site to squeeze in the development as close to the coast as possible.
- Accordingly, there is a complete lack of appreciation of the characteristics and dynamics of the area.
- It was described as an 'industrial urban' site because it has a duck farm nearby and its proximity to the A12, two miles away!
- Then, there is their derisory response to the cumulative impacts.

## **CUMULATIVE IMPACTS**

The Panel and SPR will be well aware that twelve energy projects have been identified for this area stretching over a period of fifteen years. These include Sizewell C, a transformative project which has received government commitment.

SPR refuse to fully assess the cumulative impacts of these, especially Sizewell C as 'speculation'.



This is disingenuous and unintelligent.

Having spent ten years so far deliberating on this project and talking to others in the industry and local authorities they are more than aware of what is going on.

The Panel must have received more than 300 group and individual representations setting out in varying degrees of detail the extreme consequences – this is called ‘planning’.

### **PROJECT ORGANISATION AND CONTROL**

We are alarmed that at this late stage 2020/2021, some ten years after gaining the licence, several issues are outstanding. Whilst acknowledging the reluctance to commit to excessive expenditure prior to consent the following are issues that should have been addressed at the feasibility stages, namely:

- The choice of landfall site and the methodology for accessing this long recognised fragile stretch of coastline and in turn
- The offshore cabling required and the implications of the tumultuous tides along this stretch of coast.

The reasons for requiring a development period of seven years i.e., some 17/possibly 19 years after the licence approval are unclear and suggest further lack of coordinated planning.

We know that such developments are packaged to on-sell to investors, infrastructure funds and other energy companies. To what extent are these being driven by corporate financial considerations? How does this timeline meet whatever commitments to progress speedily the need for renewable energy?

Given all the above, what trust can we place in the subsequent management and execution of the development in a timely and sensitive manner during the construction phases and then once operational? How are the ongoing commitments and policing thereof to be constituted and enforced?

### **NATIONAL GRID**

We now come to the role of National Grid and its associated organizations – NGET, NGESO and National Grid Ventures. We acknowledge that the Planning Inspectorate have registered their own ‘disappointment’ at the lack of NG involvement. Not least as interested parties in this particular development we would have expected some input. Instead, everyone is assuming that this is a ‘trojan horse’ to accommodate all their other projects. These should all be subject to individual DCOs but the cumulative impacts are of such a scale as to be addressed now and not on a piecemeal basis.

### **SOCIO-ECONOMIC ISSUES**

If the various planning and execution issues are still to be resolved, how can the developer make unsubstantiated claims about job creation?



How can it not address the destabilising implications for the local economy (inward investment) and the damage to the environment and visitor economy as set out in the Suffolk DMO research?

## **FRISTON**

In sum the uncertainties and timescales to which the Friston community is being exposed are intolerable. **Mental stress IS an issue** and not according to SPR 'negligible', 'not significant' etc. This has been ongoing since 2018 when the community was first informed at an Information Day in the village hall when representatives of SPR had to be hauled out of the hall to be shown exactly where the developments were to be sited just a few metres away!

Since then, there has been just one meeting in July 2019 with the Friston Parish Council and even now all our concerns have been ignored. Instead, discussions go on behind closed doors with various 'consultees' to the exclusion of Friston. **This is NOT engagement.** Our community is quite understandably distrustful, fearful and disenfranchised.

## **Remembrance**

Friston Church and its community have a long-established tradition of remembering the sacrifices of its past residents for our freedoms today. The village War Memorial and Commonwealth War Grave are situated in the church grounds.

The annual service of Remembrance Sunday on 8<sup>th</sup> November was especially poignant. Held outside, the congregation socially distanced facing the War Memorial and looking North across the fields. An idyllic Autumnal sunny day, all that could be heard during the 'silence' were the birds in the hedgerows. All wondered how many more years might we be able to reflect and contemplate without staring into an industrial landscape?

## **Landscape and Heritage**

The setting above manifests the inter-relationship of the Church, War Memorial within the churchyard and the surrounding countryside. Many graves are still maintained and visited to meditate on the past and think of lost loved ones. The peace and tranquillity deepen that relationship. They are important links with the social history of the village.

That extends to the historical relationship between the church and the group of medieval farmsteads which lie to the north. This inter-relationship should be assessed as such wholly and not as individual properties. Please refer also to the expert reports of SASES – Michelle Bolger (Landscape) and Richard Hoggett (Heritage) and supported by Suffolk County Council and East Suffolk Council in their observations.

Allied to the above is the loss of footpath 6 going north from Church Road – the most popular walking route for villagers. Below is a villager's sensory experience underlining its value.

'I couldn't agree more with the Historical England expert when he flagged the importance of the experience of the church when walking from Little Moor Farm (a view that will be lost forever should this project get the go ahead) – for me, with the crops in the foreground; walking along the pilgrims path towards the church; with different aspects of the church being revealed (both in angle and detail as you draw nearer); knowing historic travellers



have experienced the very same view for hundreds of years; I find this extraordinarily uplifting (dramatic as this sounds, it makes my heart sing) – it is one of my favourite views, and I will often walk that way if feeling low in order to lift my spirits (though I am now finding it harder to edit out what might well be coming our way, particularly with the fields left fallow, awaiting for SPR's 'delayed' Archeological dig experts'.

### **Specific Construction Issues**

The boundary of the onshore development extends southwards to the northern boundary of the churchyard at Church Road. This is to accommodate construction work for surface water outfall to the Friston Watercourse. We are concerned to preserve the character of Church Road and its part of the peace and tranquillity; the impact of heavy construction traffic and machinery disrupting services through noise and vibration; blocking access during the work and potentially damaging the hedgerows alongside the church.

Pre-construction access should not be allowed along the Sandlings Path or through Friston. All construction vehicles should use the cable route haul roads.

### **Mitigation**

None of what has been threatened can be mitigated. All that is offered by SPR is tree and vegetation planting as screening which even they argue will only reach maturity after fifteen years. Their growth rates have been disabused by expert submissions of SASES, Suffolk County Council and East Suffolk Council.

Friston Parochial Church Council

14 December 2020