

**SCOTTISHPOWER
RENEWABLES**

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments Friston Parochial Church Council's Deadline 9 Submission

Applicant: East Anglia TWO and East Anglia ONE North Limited
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Applicable to East Anglia ONE North and East Anglia TWO



Revision Summary

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Description of Revisions

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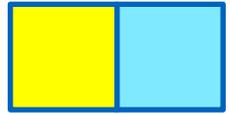


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Glossary of Acronyms

CCS	Construction Consolidation Site
DCO	Development Consent Order
EIA	Environmental Impact Assessment
HGV	Heavy Goods vehicle
OAMP	Outline Access Management Plan
OCTMP	Outline Construction Traffic Management Plan
OTP	Outline Travel Plan
PD	Procedural Decision
SASES	Substation Action Save East Suffolk
SPR	ScottishPower Renewables



Glossary of Terminology

Applicant	East Anglia TWO Limited / East Anglia ONE North Limited
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.



1 Introduction

1. This document presents the Applicants' comments on the Friston Parochial Church Council's Deadline 9 submission (REP9-057).
2. This document is applicable to both the East Anglia TWO and East Anglia ONE North DCO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23rd December 2019 (PD-004). Whilst this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it for the other project submission.

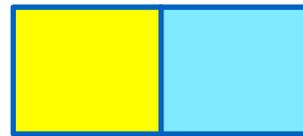
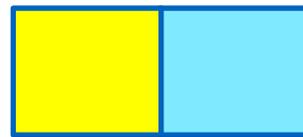
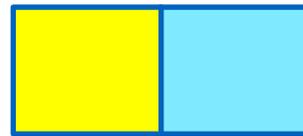


Table 1 Applicants' Comments on the Friston Parochial Church Council's Deadline 9 Submission (REP9-057)

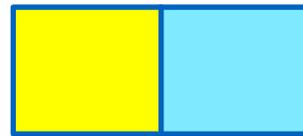
ID	Friston Parochial Church Council's Comment	Applicants' Comments
INTRODUCTION		
1	<p>We are confused and anxious at recent events and set out our concerns below.</p> <p>We have now seen the forbidding future if consent is granted.</p> <p>Meanwhile, on a glorious Easter Sunday when our congregation could come together after many months of restrictions, our presiding priest sat in her 'stall' looking out of the window westward. She was moved to wondering aloud how much longer she might be able to see an unspoilt rural landscape?</p>	<p>Noted. Please see the Applicants' Deadline 10 submission Onshore Site Investigation Works Update Note (document reference ExA.AS-9.D10.V1) regarding the recent ground investigation works.</p>
SUMMARY AND CONCLUSION		
2	<p>We have limited expertise in the many hugely technical issues and similarly a limited capacity to absorb and understand the extensive documentation comprising the applications for the Development Consent Orders.</p> <p>We are though passionate about preserving our church and grounds which have stood for over 1,000 years. Most important is to maintain our role in the community – its care – and to reach out.</p> <p>Care seems to be the missing link in the Examination. We have followed closely its progress. We have been awed by the volume, depth and breadth of representations by local organisations and individuals almost all of whom have been vehemently opposed to the Applicant's proposals for Friston and across the surrounding areas.</p> <p>We share and support all those concerns. Like them we do not oppose the drive to reduce the carbon footprint and find 'greener' sources of energy. 'Climate change is not an optional extra but a core matter of faith'. But the proposals here are for a connection point to the offshore windfarms and not</p>	<p>The Applicants note the concerns expressed. The Applicants undertook several phases of consultation from 2016 to 2019 using several methods of engagement, including Public Information Days; meetings; newsletters; direct discussion with landowners; and dedicated projects websites with e-mail addresses for queries. The purpose of this consultation has been to ensure development of the Projects was well informed by local knowledge and sensitive to the concerns of local communities.</p>



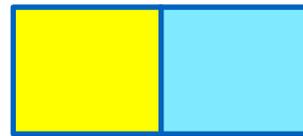
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	<p>crucial to its proceeding. Our perception is that the motivation here is not altruism but a desire by a commercial organisation to find the cheapest location for the connection point. They have been insensitive to the arguments and issues raised. We are concerned to protect the characteristics and benefits for all of this richly endowed area of the Suffolk Heritage Coast.</p> <p>Our communities have suffered enough the strains of dealing with this process. The prospects of the extended construction periods; the cumulative effects of Sizewell C and other potential projects such as the National Grid Interconnectors – these are intolerable burdens.</p>	
EXTENSION OF THE EXAMINATION		
3	<p>We regret the unexpected extension of the Examination by three months until 6 July 2021 and note that it took the Secretary of State some two months to respond to your request.</p> <p>The strain on those most affected by the proposals and those participating in the process, and there are many beyond Friston, is hugely apparent. Our concerns and reasons are clearly set out in the letter of objection submitted by five organisations on 8 April 2021 of which Friston Parochial Church Council was a co-signatory. Indeed, those strains have been further stretched by the extension of the Examination; less ability to track the Sizewell C Examination; and now the sudden commencement of investigative groundworks at Thorpeness, Sizewell and Friston.</p> <p>We sincerely hope that the extension is used to reflect on the inappropriate site selection for the connection points at Friston. We remain firmly opposed to the choice of Friston as the site</p>	No further comment.
CRASSLY INSENSITIVE COMMUNICATION OF SPR		



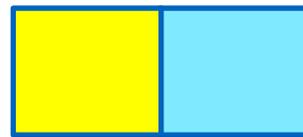
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4	<p><i>'The only way to mitigate against uncertainty is through strong communication and provision of information by the Applicant'</i> Quote from EA1 North Environmental Statement: 27.6.2.2.3-251</p> <p>It is established fact that communication is only effective if timely and conveyed in a manner which understands the needs and concerns of the audience.</p> <p>We recognize that SPR has not got a good message to sell when it is destroying the lives of communities, but at least try harder.</p> <p>This is a multi-billion £ multinational which boasts about its experience and the investment of billions of pounds and what follows is lamentable.</p> <p>Other than a cursory e-mail from SPR on 17 March 2021 warning us of ground investigation works, communities were totally unprepared for the sudden disruptions arising from the delivery of heavy equipment at Sizewell for the landfall site at Thorpeness and the appearance of numerous site access warning signs across the area – Thorpeness, Sizewell, Aldringham and Friston. These were set up on Thursday 8 April 2021 and mysteriously all had been removed by Saturday 10 April 2021. But as we write some have returned.</p> <ul style="list-style-type: none"> • The original e-mail of 17 March was short of detail of the extent of what was proposed other than ground investigations. • There were roadside notices which one would have to have walked past or parked the car (and you are aware from your own site inspections how difficult that is in the area) to read but they were also short on detail. • There were no defined works locations and schedules since the programme would be 'evolving'. And this is for works which arguably should have been undertaken at the site selection process. 	<p>The Applicants note the comments and have provided their position in relation to these works in the <i>Onshore Site Investigation Works Update Note (document reference ExA.AS-9.D10.V1)</i>.</p>



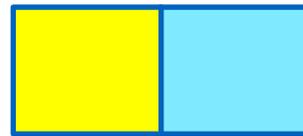
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	<ul style="list-style-type: none"> The works to be spread over a period of four to five months - the summer months when residents and visitors would most expect to enjoy their environs. Holiday lets in the village are already fully booked through Summer, Autumn and Christmas. Rubbing our noses in it, working hours were to be 7am to 19.00 hours, Monday to Friday; 7am to 13.00hours on Saturdays. All this coming out of lockdown; on top of that the rigours of the virtual Examination and all hoping for at least some temporary respite. Meanwhile the Sizewell C Examination has commenced and there is a need to engage with that to understand better what is proposed and the cumulative impacts. There has been no explanation, let alone apology for this debacle. The most recent communication was an SPR e-mail to the Friston Parish Clerk at 6.27pm on Tuesday 13 April advising site investigation works due to start at 9.30am on Wednesday 14 April. Fortunately, we have a diligent Parish Clerk who happens to look at e-mails at night and was able to forward this information to Councillors at 8.10pm! Clearly, there has been a rethink since there is now a plan showing three access points, down from the original six. But what else is planned during this period and when? 	
COMMUNITY LIAISON		
5	<p>We have gone into detail here because there is a serious issue for the future if the developments are consented.</p> <p>The role and competency of the Community Liaison Officer are only as good as the management and support team responsible for planning, management</p>	<p>At least one dedicated Community Liaison Officer will be allocated to the projects, should consent be granted, who will work within the wider Stakeholder Management Team. The role is accountable directly to the Applicants.</p>



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	<p>and implementation of the works. It is quite clear that there are serious shortcomings here. It is not sufficient to say that 'the schedule is constantly evolving' when their actions cause disruption to residents and visitors.</p> <p>We and others in our past representations have asked that whoever is appointed Community Liaison Officer for the projects during construction is the responsibility and accountability of the Applicant and not delegated. That person should have powers to act.</p>	<p>They will work closely with the construction, consent compliance and project managers as the projects progress throughout construction as well as the external contractors, to manage relationships with local communities and provide updates on the developments' construction.</p> <p>A Project Community and Public Relations Procedure will be produced following consent, which will define this role, the identified stakeholders, the enquiry management procedure and the stakeholder engagement and communication methods to be utilised.</p>
FRISTON HAS SEEN THE FUTURE		
6	<p>However, that was time enough last week for residents once and for all to envisage what will become of their communities if these developments are consented. We make no apologies for drawing on the initial signage in Friston which suddenly appeared since it is indicative of what will be required if construction works are consented.</p> <p>The number and location of signs indicated six access points, two of which were Public Rights of Way. That seems excessive for ground investigation works.</p>	<p>Representations have been made to the Projects' Examinations regarding the presence of safety and traffic management signage within the village of Friston. Such safety and traffic management signage is essential in maintaining the safety of members of the public and site personnel. The locations of all signage within the public highway has been agreed with Suffolk County Council.</p> <p>Signage is required as traffic calming measures at locations in which speed reduction is necessary. Such signage follows the 'Safety at Street Works and Roadworks Code of Practice' and is in accordance with Temporary Traffic Regulation Orders for the works.</p> <p>Signage is also required to ensure safety at each site access location. This signage has been approved by SCC and is in accordance with the 'Safety at Street Works and Roadworks Code of Practice'. Following the initial installation of signage, and feedback subsequently received from the local community, the Applicants subsequently removed all signage other than for those works which had already commenced in order to reduce the time the signage was present. in the area. The Applicants then reinstalled relevant signage excluding signage relating</p>



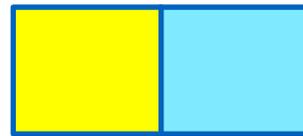
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	 <p>Image (SPR 1) above shows the entrance to Church Road off the Aldeburgh-Saxmundham Road. The road is single track and is a pedestrian route to footpaths, the allotments and Church and Village Hall. The spiritual and social hub of the village. A more appropriate sign would be – ‘Site traffic beware of pedestrians’. The siting of the sign was actually dangerous bearing in mind the narrowness of the lane and sightlines are difficult exiting the road.</p>	<p>to a proposed access off Church Road, Friston, which the Applicants consider to be surplus to requirements.</p> <p>The Applicants' stakeholder management team received a direct complaint that signage was placed on private land in the northern section of Grove Road which was investigated and confirmed to be on public highway. With regard to SASES' submission that a sign on the southern section of Grove Road was placed on private land (photograph 5 of REP9-081) this sign was placed in error and has been removed and subsequently repositioned.</p> <p>Safety is of paramount importance to the Applicants and therefore such signage must remain in place until completion of the associated onshore site investigation works.</p>



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	 <p>Image (SPR 2) above shows the entrance to Grove Road at the junction of the AldeburghSaxmundham Road and the by-road, Mill Road. You will be aware that Grove Road is quite narrow and heavily used. The sign has been placed on the village green.</p> <p>It is also used as an alternative pedestrian and vehicle route through the village to Church Road which is adjacent to the next site access below (SPR 5):</p>	



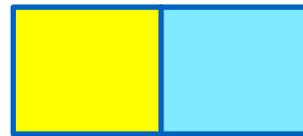
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	 <p>This site entrance is a much-used footpath and you will notice the driveway in front of the sign. Its position and the movement of site traffic will be dangerous for the resident's view when exiting the property. The position of the above sign is opposite the proposed entrance to the pre-construction work between Grove Wood and Knodishall CCS.</p>	
7	<p>Grove Road is a key highway:</p> <ul style="list-style-type: none"> • It is a pedestrian and vehicle route to Church Road and the various facilities mentioned previously. • At the junction, it connects to the Mill Road by-road and provides a cut-through between the A1094 to the Saxmundham-Leiston Road and also routes to Theberton and Sizewell. • It will have the pre-construction access point to Knodishall. 	<p>The Outline Access Management Plan (OAMP) (document reference 8.10) details the proposed access strategy to avoid the requirement for construction traffic to travel through Friston. Central to the access strategy is the construction of a temporary haul road and access from the B1069 which would route westwards towards the onshore substations. This strategy requires construction traffic travelling along the temporary haul road to cross over Grove Road. The crossing is designed to only permit construction traffic to cross from one side of the</p>



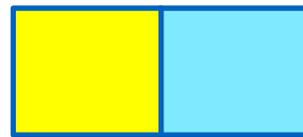
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	<ul style="list-style-type: none"> • Further up there will be the crossing point between the Knodishall haul road connecting to the substation site. So, there will be extra traffic used by contractors for this and Sizewell C seeking a short cut to avoid congestion elsewhere. • It provides road and footpath access to Knodishall (and an alternative to Leiston). • It is subject to heavy farm equipment and traffic as facilities are shared between Manor Farm and Blackheath Farm Estates. <p>The overriding concern is the cumulative impact of traffic being diverted through the village to avoid congestion. The lack of pavements in the village creates major safety concerns and limits the accessibility and ability of residents to move freely around the village and interact with others as part of exercise and wellbeing. Especially since favourite footpaths are being closed permanently. There will be the wear and tear of the road and erosion of verges which will be unsightly and indicate neglect.</p> <p>And that is over a construction period which could extend over a period of five to seven years and possibly beyond if further energy projects materialise – in effect the signs become permanent sending out an unwelcoming message.</p> <ul style="list-style-type: none"> • They become a deterrent to those wishing to visit the village – its public house, The Old Chequers; the social and spiritual hub at the Church and Village Hall and the regular programme of events all of which sustain the social and economic life of the village. • They will be a deterrent to those considering a move into the village, which raises the concerns for the future of the village. An ageing population is not replaced by younger generations who can take on maintaining the work and institutions of the village. What are the consequences for the village appearance, health and social fabric? 	<p>existing public highway to the other. <u>No construction access or egress would be permitted from Grove Road.</u> By definition, no construction traffic is permitted to travel along Grove Road to access the haul road during the construction phase of the Projects.</p> <p>To implement the access strategy, it is necessary for a limited number of construction vehicles to access Grove Road during onshore preparation works to construct the crossing points. Section 3.2.2 of the OAMP (document reference 8.10) confirms the onshore preparation works activities and sets out the delivery routes and the traffic management measures and protocols that would apply.</p> <p>The Outline Construction Traffic Management Plan (OCTMP) (document reference 8.9) and the Outline Travel Plan (OTP) (REP9-007) contain measures to ensure that the designated construction routes are complied with by construction traffic including driver induction, vehicle monitoring and enforcement of plan breaches.</p>
<p>QUIET LANES SUFFOLK – FRISTON</p>		



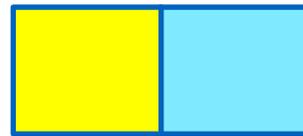
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8	<p>The coincidence of all this is unfortunate since the community of Friston wishes to participate in this county wide project. It is supported by Suffolk County Council, the East Suffolk Community Partnerships and the East Suffolk Greenprint Forum. The aim is to benefit everyone who lives in, works in and visits our county, by creating Quiet Lanes to encourage the use of more active forms of travel such as walking, jogging, cycling and horse-riding. Not only will this improve people's wellbeing it will support the drive towards making Suffolk carbon neutral by 2030.</p> <p>Quiet Lane designation is to encourage drivers to 'Expect and Respect' more vulnerable road users and so allow them to enjoy rural lanes in greater safety. In conjunction with Suffolk County Council (Highways), Friston Parish Council have identified Church Road into Church Lane, Mill Road and the Friston part of Grove Road (extending to School Road Knodishall). As indicated above, these are the roads most vulnerable to the site construction works.</p>	<p>The Applicants response at ID7 provides a summary of the Projects access strategy and how this strategy would be managed, monitored, and enforced. This access strategy would ensure that no construction traffic would use the intended Quiet Lanes of Church Road, Church Lane, Mill Road or Grove Road. The Applicants therefore consider that as there would be no change in existing traffic flows, the Projects would not impact upon any future aspirations to designate these roads as Quiet Lanes.</p>
THE THREATS AND LOSSES FROM THE DEVELOPMENTS		
9	<p>We have followed closely the submissions, representations and hearings and set out below some of the perceived threats and losses arising from the developments following the cable route from landfall at Thorpeness through to the connection site at Friston.</p> <p>At landfall at Thorpeness:</p> <ul style="list-style-type: none"> • The cliffs are notorious for erosion and subsidence. • The existence of the Corraline Crag. • The existence of the Suffolk Chalk aquifer. 	<p>Regarding preliminary investigative works, the Applicants would note that the various site surveys undertaken to date are what is required in order to prepare a robust Environmental Impact Assessment (EIA). and to make the Applications; further survey effort will be made to inform the detailed design of the Projects post-consent.</p> <p>The Applicants have made numerous submissions to the Examinations regarding potential impacts on Thorpeness Cliffs (REP8-053), the Coralline Crag (REP6-024), the Suffolk Chalk aquifer (REP6-021), the Sandlings (REP6-036) and the Hundred River (REP8-084). Through the Statement of Common Ground (SoCG) process, the Applicants have continually worked with the relevant technical stakeholders to reach</p>



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	<p>We are not geologists but given the knowledge of the existence of these elements, surely preliminary investigative works should have been part of the site selection process, not at this late stage.</p> <p>We are also aware of the Thorpeness Coastal Futures Group concern for the sea defences at the north end of the beach which are said to be extremely dangerous needing the development of a long term (30 years) sustainable plan.</p> <p>Thorpeness to Sizewell</p> <p>A popular walking route, in the short distance the cable haul road and corridor cause disruption and potential damage to the charitable activities of:</p> <ul style="list-style-type: none"> • The Wardens' Trust, • The Sizewell Hall Christian Conference Centre • A sanctuary for horses. • The popular Beach View Holiday Park which offers a diverse range of economical accommodation and facilities for visitors to the area. <p>The Sandlings</p> <p>Concern for the local ecology, biodiversity and disruption to the lives of residents over and above the consequences of their proximity to Sizewell.</p> <p>Aldringham</p> <p>Is affected by the Sizewell C development visual impacts. It will also be more at risk from the SPR proposals owing to the environmental and biodiversity impacts at the River Hundred area; concerns relating to the crossing at B1122; loss of woodland; proximity and disruption to Aldringham Court Care and Nursing Home, Coldfair Green School.</p> <p>Friston</p>	<p>agreement on the Projects in relation to many of the issues listed and other areas; up-to-date summaries are provided in the Applicants' Deadline 9 Topic Position Statements (REP9-009).</p>



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	<p>Faced with industrial development so close to the village population and that becoming a hub for further energy projects the energy and spirit is sapped out of the community and it becomes some kind of neglected industrial wasteland.</p> <p>We are especially concerned for the ability to sustain our pastoral and spiritual care for the community. To maintain the ambience and dignity for our services, baptisms, marriages and funerals; and our outreach activities which also provide vital income; to preserve its heritage</p>	
OUTSTANDING AREAS OF DISAGREEMENT		
10	<p>We are concerned that anticipating the end of the Examination, how many areas were subject to disagreement; where examination was incomplete and a perception that there was a rush to reach agreement between parties or failing that, to agree deferring decisions and actions post consent. Consent should not be granted if there are substantive areas of disagreement.</p> <ul style="list-style-type: none"> • Noise at the substation site. This is a substantial area of disagreement between the experts of SPR, East Suffolk Council and SASES. This is untenable given we are concerned for the long-term operational noise levels close to a residential community. They and their successors have to live with this in an environment renowned for its quietude. • Flood Risk and drainage. There remain considerable concerns from Suffolk County Council and the village arising from run-off following heavy rainfall. • Traffic management and safety. This needs closer scrutiny. Issue Specific Hearing 13 was considered disappointing. It was monopolised by a consultant for the Applicant in discussion with the representative of Suffolk County Council who seemed to consider most options as the least bad. Complacency was the word used by an interested party whose own expert witness was cut short. Traffic flows at peak periods have not been assessed and there is a lack of 	<p>Through the SoCG process, the Applicants have continually worked with the relevant technical stakeholders to reach agreement on the Projects in relation to the topics listed and many other areas. The Applicants would point to their Deadline 9 Topic Position Statements (REP9-009) which provides a more current overview of the status of the topics listed.</p>



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	<p>clarity surrounding HGV movements. The resilience of the local highways will be tested. Congestion will lead to frustration and seeking alternative routes to which Friston will be especially vulnerable as discussed above.</p> <ul style="list-style-type: none">• Following from the above are concerns for air quality given the cumulative traffic movements arising from residents, visitors, delivery vehicles and construction workers for local property developments as well as for the energy projects.• Socio-economic issues. Increasingly we are thinking that we are subject to a propaganda war waged by lobbyists for the energy industry. We acknowledge all the technological developments and potential opportunities. Unchallenged figures for employment are bandied about without any apparent thought as to how and where these should be accommodated and located. Evolving government policy highlights the concerns for the wider environment and preserving green spaces for health and wellbeing. Our own representations have highlighted the growing Suffolk Coastal economy, the urbanisation and industrialisation. The visitor economy is attracted by the diverse richness of the scenic sea and landscapes combined with the diversity of cultural activities. These give relief to these pressures and brings substantial employment, income and investment to the area which can more than outmatch the further expansion of the onshore energy sector in this area.	