



FRISTON PAROCHIAL CHURCH COUNCIL
RESPONSES AND WRITTEN REPRESENTATIONS
RE ISSUE SPECIFIC HEARING 16 – FRISTON SITE
SPR EA1N AND EA2 PROJECTS (DEADLINE 11)
PINS Refs: 20023636 & 20023639
Date: 7 June 2021

‘We should focus on the natural environment and especially on natural sequestration.
Bring the trees, the soils, the peat and the marine world into the carbon play’.

Source: Sir Dieter Helm, ‘Net Zero’



Aerial photograph of the proposed SPR/National Grid site at Friston. 21 May 2021.

Loss and destruction as SPR undertake investigating groundworks less than five minutes' walk from the village.

Is this our legacy for future generations?



1 Introduction

Throughout this Examination we have concentrated on social and economic issues in so far as they relate to the care, health and wellbeing of our community as befits our church.

We have been indebted to the work of SASES.org.uk on behalf of Friston Parish Council for their detailed and comprehensive technical and legal inputs supported by a team of experts in particular disciplines.

Similarly, we are indebted to the work of SEAS who have provided invaluable inputs over a huge range of issues.

We continue to support the representations that both organisations have made. We have drawn heavily on their work and sought to complement that in our own research, especially emerging policy issues and initiatives highlighting the need for more strategic and co-ordinated planning,

We make little apology if we are perceived to be covering 'old ground'. But at this late extended stage of the Examination our community harbours considerable concerns and do not think that we are being 'listened to'. That these are not being taken seriously and are insufficiently addressed by the Applicants and also by our local authorities – Suffolk County Council (SCC) and East Suffolk Council (ESC) – as statutory consultees and discharging authorities.

These concerns were borne out by what we considered to be inadequacies in the Issue Specific Hearing 16 (ISH 16) on Wednesday 26 May 2021.

We live here and our lives matter.

2 Summary

Outstanding issues and concerns:

- Flawed and deficient site selection and now with added uncertainties as to the land requirement if projects do not proceed. (S 3)
- Loss of landscape and heritage (S 4) and we include submission of Revd Mark Lowther, Rector of Alde Sandlings benefice and Chairman of Friston PCC. (S 5)
- Health and safety issues: (S 6)



- Noise (S6-1)
- Flood and drainage (S6-2)
- Design Principles (S6-3)
- Landfall and aquifer (S6-4)
- Traffic and transport (S6-5)
- Cumulative impacts (S 7)
- Regulatory regime (S 8)
- Protecting local communities and the role of East Suffolk Council (S8-1)
- Energy industry review and need for an overall national network infrastructure plan. National Grid conflicts of interest. No proper cost benefit analysis or consideration of alternative options espoused by our MP, Dr Therese Coffey. (S 9)

3 Site Selection

It remains that we and surrounding communities consider that the site selection process was severely flawed and deficient.

We are at the heart of the Suffolk Heritage Coast with all its ecological, environmental and social benefits in a peaceful and tranquil area.

Friston could lose the landscape and heritage benefits of its setting which has existed for 1,000 years.

It is unacceptable that uncertainty remains as to whether the site is a 'dumping ground' for another connection point or some more covert means of developing an energy hub for additional projects. National Grid 'offered' this site to SPR but has been conspicuous by its absence in the Examination which is perceived as a dereliction of its responsibilities and accountability as the national supply operator and co-ordinator. Following the recent hearings, it now seems uncertain if and when both projects proceed, in which case why the need for the land in Friston? Just what are the timescales? How much loss and disruption are our communities to suffer?

4 Loss of Landscape and Heritage

There remain the concerns of Historic England, SCC and ESC along with those of the experts employed by SASES at the irredeemable loss of landscape and heritage – the settings of historic buildings and, at its heart, the Grade II* listed Church of St Mary the Virgin, Friston.



Our Chairman and Rector of the Alde Sandlings Benefice which embraces the other affected Parishes has prepared the attached submission which was to have been presented at ISH 16. This encompasses all that we stand for.

5 Submission to the Issue Specific Hearing 16, Wednesday, 26 May 2021

The Revd Mark Lowther, Rector of the Alde Sandlings benefice (which includes Friston) and Chairman of St Mary's Friston's Parochial Church Council.

I've made a submission to this inquiry before and in it I concentrated on the effect that the construction and operation of the proposed substations would have on the people of Friston and the surrounding communities. The church is its people but the church is also the guardian of the place where those people most regularly meet – the Parish Church. So let me take you there – and give you a verbal picture of the church building and its immediate surroundings.

The first thing that will probably strike you about St Mary's Friston is its prominent position. It can be seen from a goodly distance away and standing in the churchyard affords a wonderful view across the village to the south and the fields over towards Friston Moor to the north. It has been here for a long time – a very long time. The East Suffolk volume of 'The Buildings of England' ('Pevsner' to you and I) says that the nave – the main part of the building is 'Norman or possibly pre-Conquest' and virtually every century since has seen something added or revised or rebuilt – it's a living historical record in stone and wood, as church buildings so often are.

Come into church, through the 12th-century south doorway and look around you. Two things will, I think, strike you immediately. The extraordinary wooden 17th-century Royal Arms of James 1st, made out of 5"-thick timbers and attached to the north wall ('a spectacular piece of woodcarving' says Pevsner). And the 19th-century painted walls and ceiling of the chancel - the east end of the church. I have to say that I have visited lots of churches over the years and have never seen anything like this - it's very unusual indeed.



Sit quietly for a few moments (and it is very quiet in the church) and, gradually, something else will dawn on you. More than likely, there will be fresh flowers in the church. Each individual hassock (cushion to kneel on) has been carefully hand-embroidered. There's no dust or musty smell. This is a place that is loved – just as it has been for hundreds of years. It's a place that matters to its community and its members spend time and energy caring for it.

There are services every Sunday. There are also what are called the 'occasional offices' – hatching, matching and dispatching – baptisms, weddings and funerals. Outside, the churchyard is cared for just as lovingly as the church building. It's kept tidy and when you visit you may well find someone tending a family grave – there will be fresh flowers in evidence outside the church as well as inside.

And the churchyard is used for special events too. Only this last weekend a community plant and produce stall raised almost £1 000 for one of our local hospices. Concerts took place in the churchyard last summer and are planned once again for this year. The audience and the musicians love the peace, tranquillity and the setting – and, again, money is raised for good causes. And finally, the village's War Memorial, setting for the annual Remembrance Day commemoration, is in the churchyard to the south-east of the church building. It's a place where people come to remember the villagers, sometimes members of their own families, who lost their lives in the two World Wars.

Now let me do some time travelling and take you to Friston churchyard in a few years' time, should the proposed development go ahead. What will strike you first as you walk up the path from the car-park to the church? The literally overwhelming view from the north side of the churchyard. The substations will dominate the landscape and nothing we have seen concerning mitigation will improve that. They are huge and huge they will remain. Walk round to the north side of the church, where last year's concerts were held and the view (and quite possibly the hum) renders the site impossibly compromised for such events. Then when you enter the church and look out of the window next to the 17th-century wooden coat-of-arms you will see nothing but the substations.



Now - those 'occasional offices' that I mentioned. Well, would you choose to be married in Friston church if the photographer had to be so careful about what was in the background of some of your precious photos? Couples have a choice these days and if I were they I would choose somewhere else on those grounds alone.

How about those who, like their fellow villagers for hundreds of years, have had their funerals in the church and are then buried in the churchyard? Look around from some of our most recent graves to be dug, at the western end of the churchyard, and you see substations. The sort of tinkering with the details that are proposed can't take their impact away. And the annual Remembrance Day service, at which folk gather to the south-east of the War Memorial to see the names of those who are being remembered, would afford everyone a panoramic view of the substations.

The impact of the placing and design of the substations would seriously affect so much of what the church is and does. And (and I know that this has been covered extensively at other times but I think it's worth reiterating) this thought would be for ever in everyone's minds – it didn't have to be like this. There were alternatives. But 'they' chose this plan – 'they' chose to ruin the village. They didn't have to but they did.

Now I'm going to be a little bit theological for a moment. Last weekend the church marked the Feast of Pentecost, the coming of the promised Holy Spirit, when humankind was given the ultimate gift from God and empowered to be Christ's body on earth. And part of the church's responsibility as Christ's body on earth here and now is to care for the earth – God's creation. In 21st-century practical terms that means supporting efforts to reduce climate change and the drain on the planet's resources. Wind energy is good and a vital part of that attempt to reduce the amount of the earth's carbon that is currently being wasted. But this can't be done at any cost. There are other issues which are set out below.



6 Health and Safety

There is concern that, even now, the two most important issues have been inadequately addressed.

- 6-1 Noise

The impact of operational noise is unknown and separate experts of ESC and SASES have highlighted inadequacies or disagreement with the approaches of the Applicants. Those of SASES and other Interested Parties remain, but ESC as discharging authority has reached some compromise with the Applicant which we regard as insufficient. It questions the role of ESC in this Examination (see S8-1 below).

- 6-2 Flood and Drainage

Flooding was identified as a major issue at a meeting of Friston Parish Council with the Applicants in July 2019 and SPR assured the Council that would receive priority.

It is incredible that on the basis of ISH 16 in the presence of experts of SCC and SASES, that this is still mired in obfuscation and shortcomings of the Applicant.

The issues are straightforward:

- Friston is subject to flooding and the frequency has increased over the last three to five years.
- There is run-off from fields to the North and South which accumulates in the heart of the village at the junction of Mill Road, Grove Road and the Aldeburgh-Saxmundham Road.
- But the worst source is the run-off from the fields where the site is to be which gushes down an unmade track, across Church Road (since the underground pipe cannot cope) into what is no more than a ditch, no matter whatever grandiose term ascribed to it, and which is inadequately maintained by whichever responsible authority (SCC or Department of the Environment?). At the time of writing, it is overgrown owing to a wet Spring season.
- It is quite obvious that deep piling and large areas of aggregate and concrete are going to increase hugely the run-off. But it remains vague as to the effectiveness of the protective measures being offered by the Applicants. At present they are not acceptable to SCC and SASES and the community.



- **6 – 3 Design Principles**

When selecting the site at Friston, we would have reasonably expected the Applicant to have considered outline infrastructure design in a virgin rural area immediately next to a village as part of that process.

But here at ISH 16 design is still subject to clarity, eg the height of equipment, the type of insulation (which apparently has implications for the carbon footprint) and their sheer scale.

All subject to agreement with suppliers, contractors and National Grid.

To cap it all the Applicant appears to be prevaricating about the need for an independent specialist review prior to construction as a means of satisfying the discharging authorities and reassuring residents.

- **Landfall and Aquifer**

Similar concerns remain at landfall and along the cable corridor relating to the fragility of the coastline and aquifer. SEAS has identified the need for a hydrological survey to further understand how the proposals might impact on the fragility of the underground aquifer.

- **Traffic and Transport**

The impact of the increased volumes of traffic and their nature, especially at peak season and whilst Sizewell C is constructed have all been aired and little comfort has been taken from the apparent lack of concern for the rural network and which remains a major safety issue in Friston.

7 Cumulative Impacts

We shall not dwell on these unduly as they have been heavily highlighted in past representations. Suffice to list those most apparent.

- Sizewell C – 7-12 years construction and under public Examination. Cumulative impacts on landscape, traffic, infrastructure, social fabric etc.
- National Grid – Nautilus and Eurolink Interconnectors looking to establish sites and links within this same area of the Suffolk Heritage Coast.
- Other potential offshore windfarm connections.
- Storage and Battery facilities. Not addressed in this Examination but another potential demand on land usage in this area.



- The carbon footprint of these projects individually and cumulatively.
- The impacts of despoiling the area for incomers and visitors and in turn the economic consequences for inward investment and the visitor economy etc.
- The cumulative impacts on traffic and transport and local infrastructure - accessibility, health and social care, quality of life, health and wellbeing.
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8 The Regulatory Regime

It is apparent that the framework of EN -1 (Overarching National Statement for Energy) is outdated. It has been overtaken by new and potential technical developments within the energy sector which are recognised in the BEIS Review and the recent Government Energy White Paper. Also, it fails to acknowledge other Government initiatives and policies relating to the environment, human health and wellbeing. Instead, we are left with a tick box exercise which precludes 'thinking outside the box' and inclines others towards abdicating responsibilities since the ultimate decision rests with the Secretary of State.

It is clear that a brick wall has been reached in the piecemeal approach to connection points for offshore windfarms and also transmission across Norfolk and Suffolk.

Consequently, Norfolk and Suffolk MPs are responding to the concerns of constituents and seeking a more co-ordinated approach to alternatives.

- 8-1 Protecting Local Communities

The existing regime suggests that local communities cannot be relied upon and are not equipped to address technical, economic and social issues. This is quite clearly inappropriate when considering the weight, depth and breadth of input of local Interested Parties, Aldeburgh Town Council and the action groups, SASES and SEAS et al.

The Covid-19 restrictions throughout the Examination have severely diminished the opportunities for community engagement and communication with the relevant local authorities and within communities themselves. The authorities have to commit greater resources to the ongoing Sizewell C Examination never mind the impossible conflicts in demands on the communities themselves.

However, it is felt that there should have been more commitment to local engagement by the statutory consultees since they become discharging authorities.



SCC is limited to its specific areas of Highways and Flooding and Drainage roles. There have been insufficient opportunities to consider other relevant issues such as implications for health and social care which fall within their remit.

As it is, they remain opposed to the developments albeit they have gone along with the traffic and transport proposals as the 'least worst options' and still not satisfied with the flood and drainage proposals.

Our greatest concerns relate to East Suffolk Council (ESC).

We acknowledge the challenges and demands of managing Covid-19, these developments and Sizewell C on the support teams and the diligence needed.

Our concerns are at the senior and Councillor levels. And the apparent conflicts of interest.

- The work and time of ESC is paid by the Applicants, so there is bound to be a bending to their views and pressure.
- Added to which there has been a 'passive' approach, almost amounting to a dereliction of responsibility to considering the wider strategic issues in deferring to the Secretary of State as the decision-maker.
- Their overall judgment has been split between the local needs of Lowestoft and Great Yarmouth and industry lobbyists at the expense of the needs of the Suffolk Heritage Coast.
- We willingly acknowledge the emerging opportunities and the focus at government and industry levels on a more co-ordinated approach to capitalising on the competitive advantages available to offshore wind energy.
- But these are not at risk from opposing the connection point at Friston.
- However, it has infected their decision to adopt a neutral position which sends the message of no support for this area and its communities.
- Indeed, this has resulted in conflicts at Council leading to the resignation of two of our Ward councillors who felt that their concerns for the local impacts were insufficiently addressed. We understand that former Councillor, Mrs Jocelyn Bond, has made representations to the Examining Authority on these points.
- Accordingly, we feel we are now being inadequately represented in the crucial final stages of the Examination; that there will be insufficient rigour in reaching their Council decisions and actions as discharging authorities.
- Not least are the concerns around mitigation (tree-planting etc) and the lack of community engagement covering compensation and the seemingly insufficient sums agreed with the Applicant.



- Signing off actions with the Applicant where key concerns may have been insufficiently addressed.

9 Energy Industry Review

No doubt you are tired of us and others referring to the BEIS Review. But its very existence points to the shortcomings of the existing processes and the need for a more strategic and coherent approach

It is wrong to prejudice the future legacy of this area for the sake of a quick decision before the review has time to consider options which offer better outcomes.

We are not NIMBYs or luddites. Any sensible person would argue against placing 30 acres of industrial ironmongery in the heart of the rural countryside and just five minutes' walk away from a popular village.

We strive better to understand the real issues and sift through the 'noise' from industry lobbyists surrounding climate change and renewable energy.

Our concern is for the proper assessment of the strategy and our latest thinking is informed by the work and reputation of Sir Dieter Helm. He is Professor of Economic Policy at the University of Oxford and an adviser to the UK Government and author of its Cost of Energy Review in 2017. His latest work 'Net Zero – How We Stop Causing Climate Change' published earlier this year is a salutary and uncompromising assessment of the challenges.

He writes of 30 wasted years in failing to address effectively infrastructure issues. We in Friston feel that we are victims of that neglect.

His premise is that there should be an overall national network infrastructure plan and that should incorporate;

- The challenges of intermittency of renewables.
- The interaction between local networks.
- Energy storage and carbon capture.
- Local generation.
- Batteries.

Few if any of the above issues have been considered as part of the Examination, but they are relevant in the wider area of future direction and potentially add to the cumulative effects in our congested local geographical environment.



Also, these have to be planned and co-ordinated at government level to drive investment and R&D which will then incentivise the private sector and avoid conflicts of interest.

There seems to be an acknowledgment that the systems operator should be a separate entity removed from the National Grid and feasibly publicly controlled (similar to the recent establishment of Great British Railways) and to avoid conflicts of interest. These impediments have certainly confused and irritated in this Examination where the various arms of National Grid have failed to engage in the myriad of concerns in these developments and those of their own in the pipeline.

Instead, the proposals before us are being considered in an inappropriate narrow way.

There is no sense of these being considered as part of an overall energy strategy.

As with most of these developments there is no proper cost benefit analysis:

- The cost of its own carbon footprints
- Cumulative impacts
- Loss of natural sequestration.
- Loss of social amenity
- Which detracts from healthier lifestyles and wellbeing
- Which are embedded in current government policies which in turn
- Offer economic benefits of inward investment and visitor/hospitality sector.

The benefits of a wider strategic review, alternative options and brownfield sites are borne out by the initiatives espoused by our own MP and Secretary of State for the Department of Works and Pensions, Member of the Cabinet. These are on record in the Examination library.