

Deadline 11 Submission Fiona Cramb

Dear Mr Smith and Colleagues

I endorse all submissions made by SASES and SEAS.

I am grateful to the ExA for the inclusion in their ExA3 questions to the Applicants of issues relating to the impact on High House Farm and make the following comments.

Obstruction of views.

1. In relation to the obstruction of the view to the church the ExA (ExA3) posed the following to SPR:

“**[REDACTED]**
Your Deadline 10 document [REP10-025] states that the current view of the Church from **[REDACTED]** would be obstructed by mitigation planting rather than by the proposed Project’s electrical infrastructure. While this statement may be technically correct, does it sufficiently describe and characterise the adverse effect on this heritage asset, taking into consideration that the proposed planting will be established solely to screen the proposed projects and will take time to establish?”

2. The ExA also asks (ExA3):

“The Applicants 1 2 OLEMS

Your answer to ExQ2.10.5 [REP6-063] relates to planting and High House Farm. The ExAs note that you are seeking to balance the proposals in trying to not enclose historic farms while mitigating visual effects on people living in the area. Your answer states that the proposed planting close to the south western boundary of **[REDACTED]** is adjacent to existing woodland within the curtilage of this property. An annotated aerial photograph is submitted as part of the answer to demonstrate this point. However, the ExAs noted on their site visits [EV-007d, and as referred to in ExQ2.8.2] that the garden of **[REDACTED]** provided clear views across a largely open landscape to the Church of St Mary. The effect was increased by the removal of various ash trees in recent times due to disease [referenced in EV-007d] which would likely change the aerial photograph were it to be taken now.”

3. The ExA is correct. The position is very clear. At present there is a clear view of the Church from the garden and the ground, first and second floors of **[REDACTED]**. This view exists in summer as in winter. This view stretches over open ground. It is uninterrupted. Ariel photographs do not, for obvious reasons, show the view from the ground.

4. The proposed works will obliterate that view. SPR's answer in effect recognises this. It says that the "church tower" or some part of it would be visible between "the western sealing end compound and the main group of substation structures". So, at its highest, there will a view of some part of the tower (not the church) sandwiched and squeezed between two much closer pieces of industrial infrastructure. On any rational view this is obliteration. But in any event SPR's point is immaterial even if it were true, as the ExA recognises, and portion the tower were visible it will subsequently be concealed by the mitigation. Either way it is the consenting of the development which will sever the connection between [REDACTED] and the village and the Church.

The marching pylons.

5. The ExA(ExA3) has asked:

"The Applicants 1 2 Combined effect of pylons and proposals Pylons are often referred to as 'marching across the landscape', which partly could be a consequence of their height and form but also due to the open frame of the pylons themselves and the space that remains beneath them. SASES [REP6-133] state that the proposals would have the effect of making the pylons more dominant than they currently appear, due to the change in the landscape around them that the proposals would cause with an open rural landscape being replaced by a more industrial one"

6. Again, the questions posed by the ExA identify the true issue. The space into which this vast structure will be placed is rural. It is tightly constrained all around by houses . At present it is a rural landscape only interrupted by pylons. Over time all local residents have become familiar with the pylons and they do not ruin the rural nature of the area. There can be no doubt but that the development would result in a switch from a rural landscape to a wholly industrial one. NO amount of wishful thinking by SPR can alter this brute reality.
7. We note also that SPR acknowledges that it has not taken into accounts the impact of other cumulative impact projects upon mitigation. SPR say in answering ExQ2.10.8 [REP6-063]:
8.

"The Applicants are not designing the landscaping proposals to accommodate any future projects. Any potential future connections would need to work within the constraints of the Projects' onshore infrastructure and landscaping and address this within their scheme design and consent application."
9. Yet, inconsistently SPR has also said, as again the ExA has pointed out
"The planting and landscape scheme has also been designed in order to not sterilise land for potential future development associated

with the National Grid substation.”

10. The underlying reality, as has been made clear by the detailed submissions of many parties is that that SPR and others are planning to use Friston as a hub and plug for multiple future projects. Yet there has been no CIA of the substantial additional adverse effects that this will have.

Ecological Complaints

11. SPR says (Applicant’s statement regarding Ground Investigation Works dated 6th May) :

“53. A member, or members, of the public have lodged complaints and concerns with Natural England, and Suffolk Constabulary (Rural and Wildlife Policing) regarding alleged disturbance to breeding birds [REDACTED] as a result of the onshore site investigation works. 54. No complaint or concern has been substantiated by the claimant. The Applicants have addressed all such complaints and concerns with the relevant organisations to their satisfaction, through confirmation of the ECoW’s role, undertaking of daily ecological walkover surveys, establishment of suitable exclusion works around protected species and amendment of the onshore site investigation works areas as required. 55. The Applicants consider such complaints to be the result of a concerted effort to discredit the management of the onshore site investigation works.”

12. The present investigatory works being carried out by SPR have led to the wholesale despoliation of the land intended as the proposed site. Breeding birds have fled. Local residents have complained to SPR whose response has been that they have carried out the necessary assessments. Yet when asked they refuse point blank to disclose these reports.
13. We and many others were shocked to see the works commence despite the presence of ground nesting birds and the accompanying destructive spraying of the fields. SPR say that they are not responsible for this. Irrespective of the veracity of this claim none of this destruction would have occurred had they had delayed the works until after the breeding season as they have been obliged to do so in other more protected areas such as the SPA and SSSI. However, the birds nesting on the site are protected by law.
14. Many in the local community wrote to SPR to ask for the evidence on which they based their decision to start these works. I was told they are unable to share the results of the surveys they say they have undertaken as they are “sensitive”. This is nonsense and, yet again, an illustration of a lack of candour by SPR. The ExA should demand that the reports that SPR rely upon are made public .

15. It is in any event extraordinary that SPR claim that there is a “concerted effort” to discredit their management team. Residents and concerned individuals are perfectly within their rights to report any potential breaches of the law to the police.

Ground Investigation Works

16. The Ground investigation works SPR are currently undertaking, the manner in which they been carried out and the communication about this work starkly illustrates the negative, disruptive and devastating impact that the project will have on the area and the quality of life of the residents living in Friston, those whose homes and businesses surrounding the substation site and those who live along the cable route.
17. The site is a tight site completely filling the area between the houses that encircle Fristonmoor and the village. It is the maximum size it could be within the physical limit of these properties and Grove Road. So the site boundaries run right up to the garden fences of properties such as mine.
18. These works are already causing high levels of anxiety amongst those who live around the site. We can no longer safely walk the paths as they are being used by vehicles and have been churned up and rendered impassable. There is also the noise of digging, drilling and vehicles beeping. This is a foretaste of what is to be inflicted on us by SPR in this wholly unnecessary project.
19. SPR asserts that the work is being done pre consent because:

“Such onshore site investigation works are typically undertaken post consent given the cost of the surveys and the potential disturbance to landowners’ activities. However, the Applicants have scheduled these site investigation works to be undertaken at the present time in order to maintain the Projects’ development programme and allow for the rapid deployment of offshore wind capacity in line with the Government’s strategy should the Projects receive consent”

20. However it is much more likely to be due to the fact that, midway through the hearings, SPR brought forward the dates for these projects to avoid being an early opportunity or pathfinder project under the proposals made in the BEISS Offshore Transmission Network Review; thus failing to support BEISS and Ofgem’s stated aim of “... increasing the level of coordination in offshore electricity infrastructure”. SPR insists on pushing on with Friston in the face of huge local opposition and the availability of other more suitable Brownfield sites

Community engagement and control measures.

21. SPR’s claims that it has active and effective community engagement team. However, despite repeated requests to Ms Berry to provide a schedule of works that might be

taking place close to our boundary they claim to only be able to give one or two day's notice because the schedule is subject to change.

22. On a number of occasions I requested information about whether drilling and trenching was planned close to our boundary and when this was likely to occur. On 26th of May I received a letter via email from the Community Engagement team informing me that works would be taking place within 100 m of my boundary and in line with their Control Measures asking me whether I would like acoustic barriers erected and to reply by May 28th.
23. In fact, the works are within 4 or 5 metres of the boundary to the house.
24. The letter was, as is usual and despite my having sent corrections previously to the team, marked with an incorrect address.
25. At all events such when the offer of acoustic protection was made the horse had bolted and the work had already been carried out with a great deal of accompanying noise and dust.
26. SPR had breached their own Control Measures as the trenching work was started on Friday 21st May and completed on the 24th. No promised rolling barriers were ever put in place.
27. My questions about drilling remain unanswered.

With regard to the Applicant's comments on my Deadline 9 submission I do not intend to repeat submissions that I have already made which I consider to be correct and compelling. I therefore concentrate only on the few issues that I set out below.

Impact on [REDACTED] / Heritage assessment (Applicants' comments on Fiona Cramb's Deadline 9 submission point 1)

28. SPR persists in arguing that the impact upon the heritage value of [REDACTED] will be of minor significance. It continues to ignore the fact that the conclusion of Historic England rejects the conclusions of SPR. So does East Suffolk Council. SPR puts all of this down to this down to differences of professional judgment. This mischaracterises the situation.
29. First, Heritage England is a true and independent expert. The Council is a public body with a duty of independence. SPR is a self-interested corporation seeking to justify the indefensible.
30. Second, if the ExA stands back from this and asks the common sense question – will [REDACTED] and other heritage assets be severely adversely affected - the

answer is plain and obvious. SPR intends to place a huge industrial infrastructure in the heart of an ancient Suffolk village and then pretend that it does not matter.

Residential amenity (Applicants' comments on Fiona Cramb's Deadline 9 submission point 1)

31. In relation to the impact of the development on the residential amenity of our property SPR refers to technical assessments contained in the Environmental Statement. I endorse submissions made by SASES and SEAS's experts on these technical matters. I have made previous written and oral submissions about the devastating impact that this development would have on us. Indeed the last few weeks have provided a depressing foretaste of what we will have to endure during the prolonged construction phase. That is before we are faced with living with a huge industrialised complex on our doorstep separating us from the village.

SPR approach – (Applicants' comments on Fiona Cramb's Deadline 9 submission point 17)

32. SPR admits that its analysis of impact has not taken account of "...the precise position and appearance of specific pieces of substation infrastructure". Instead SPR looks only at change in landscape character". This is very odd indeed. SPR admits to a partial analysis whereby it assumes that the position and appearance of vast pieces of skyline dominating infrastructure are irrelevant to the change in landscape structure.

33. This is a serious error and omission on the part of SPR.

34. I have attached three photos showing the very close proximity of the Ground Investigation works to our property. The first photo shows our garden fence to the left. The second shows a digger within about 5 metres of the garden. The third is an aerial view showing the proximity of the works as a whole to the house. All of these show what would be to come if the development is consented.

Yours sincerely

Fiona Cramb



