

SPR EA1N and EA2 PROJECTS

DEADLINE 11 - SASES RESPONSE TO APPLICANTS' D10 SUBMISSIONS:-

(A) STATEMENT REGARDING GROUND INVESTIGATION WORKS (REP10-029)

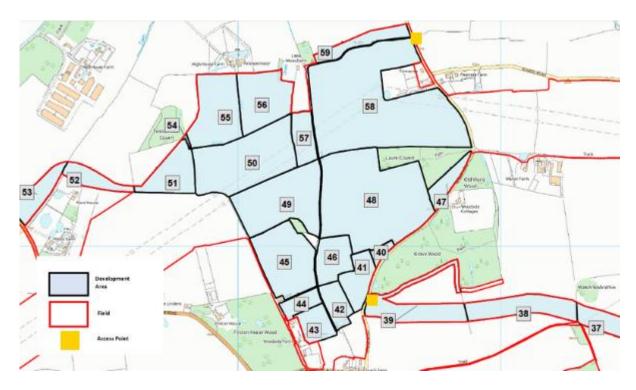
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(B)RESPONSE TO SASES' QUALITY OF STAKEHOLDER ENGAGEMENT (REP 10-20 Section 2.9)

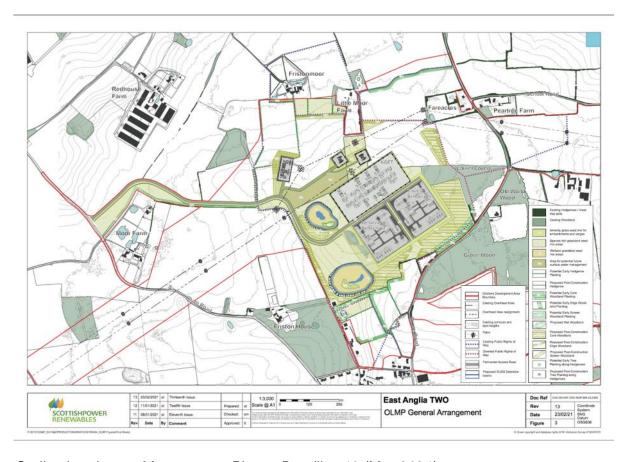
Interested Party: SASES PINS Refs: 20024106 & 20024110

Date: 7 June 2021 **Issue:** 3

- 1. The above two submissions by the Applicants, dated 6th May 2021, have similar content and are therefore dealt with by SASES together in one response.
- 2. Signage for the ground investigation works was first seen in Friston on 8th April. This aroused considerable concern from local residents, particularly those in Friston who were aware that this is the breeding season for wildlife, skylarks were already nesting on the proposed substation site, and leverets had been seen.
- 3. Concern heightened in mid April when it became evident that the fields at the substation site, as well as land in Aldringham and Sizewell had been sprayed with sterilising weedkiller. Local residents know that farmers do not normally use this type of weedkiller during the Spring months, particularly where there may be ground-nesting birds. However the Applicants have denied responsibility and continue to maintain that the landowners were responsible for the spraying. The dying vegetation can be clearly seen in Plates 2.4, 2.5 and 2.6 of the Applicants' own submission at REP10-029 with trial-trenching underway, dated 23 and 26 April 2021. The fields are now barren.
- 4. Such was the concern that Suffolk County Council promoted a meeting between the Applicants and SASES to discuss issues in relation to the site investigation works. The meeting took place on 30th April with a further meeting on ecological issues on 14th May. Some aspects of communication have improved since the initial meeting, however concerns regarding the ground investigation works persist. SASES strongly disputes the statement made by the Applicants at paragraph 55 of REP10-029 that the complaints are a result of a "concerted effort to discredit the management of the site investigation works"
- 5. Local people have been alarmed about the physical scale of the investigation works, which go beyond the actual proposed construction area. The Applicants' published a map of the extent of the works in Friston in mid-May, which is shown below. Of particular concern have been extensive investigation works in Fields 51, 55 and 58 in the north of the site, where no construction is proposed with very little landscaping, as well as the inclusion of Fields 42 and 43 to the south. This only increases speculation as to what may be being planned for the future. The map below can be compared with the Outline Landscape and Ecological Management Plan [the latest version being included with REP10-005, Annex 2].



Site investigation works in Friston - April 2021 onwards



Outline Landscape Management Plan at Deadline 10 (May 2021)

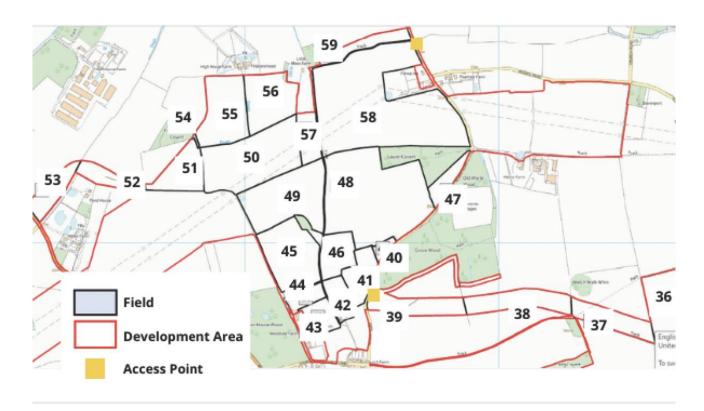
6. The Applicants made it known that they would be using the Public Rights of Way for access for the plant, machinery and workforce and that they had the landowners' consent for this.

This has led to significant deterioration of the surface of the footpaths during a particularly wet May and raises concerns over the proposals to use PRoWs for access for the potentially more intrusive Pre-Construction Works planned as part of these Applications.

- 7. There have also been safety issues with open unfenced trenches and trial pits, parking on PRoWs and conflicts between drivers and pedestrians on the footpaths. This has on occasion felt intimidating. An annotated selection of photographs of the investigation works is attached at Annex 1.
- 8. The working hours for the current works are from 7am to 7pm Monday to Friday and 7am to 1pm on Saturday. During the Late Spring Bank Holiday weekend, the Applicants chose to strim the vegetation from Field 53, which created a significant amount of noise on a very pleasant, warm morning, when nearby residents would be enjoying their gardens.
- 9. In its submissions the Applicant states that "regular (<u>at a minimum every few days</u>) updates have been and will continue to be provided to the development area parish councils, key interest groups and other individuals..". This is not the case and the Applicant cannot show this regularity of information to residents since the inception of the works. The Applicant would however be able to show a deluge of emails *from* concerned residents.
- 10. The Applicants' responses also refer to a "dedicated area on the project website for a targeted community engagement programme". This has not been implemented as of the first week in June.
- 11. The Applicants advised that the site investigation works in Friston would be complete by the end of May, however these are still on-going in the first week of June.
- 12. At paragraphs 9 and 10 of the Applicants' Statement regarding Ground Investigation Works Update, it is stated that groundwater will be investigated during the works and also be supplemented by monitoring. It is also stated that a topographical survey will be undertaken to establish ground levels. SASES submits that this is essential data, which should properly be part of the Examining Authorities' assessment of the suitability of the site for development.
- 13. The quality of communication by the Applicants has been, and continues to be, poor. On 28th May, just two days after ISH16, Update emails were received from SPR advising that infiltration testing in Friston would be complete by 3rd July. Having discussed at some length at the hearing that the Applicants need to submit their further infiltration results with a degree of urgency, this caused SASES some consternation. On enquiry with SPR, they admitted an error had been made.
- 14. The undertaking of these investigation works has very much brought it home to the local community the enormity of the impact on Friston, if the projects were consented. Recent visitors to the village have also been shocked at the scale of what is proposed. It is not to be overlooked that these works were programmed to start immediately following the planned close of the Examinations.

Friston / Knodishall

- Archaeology works are continuing across the proposed substation land at this time. We expect core
 works to be completed over the next 2-3 weeks with a smaller team remaining on site over the
 following couple of weeks for final backfilling and remediation works and cleaning of the site.
- Excavation of trenches is taking place in fields 36, 37, 38, 39, 52, 53, and 57.
- Backfilling is taking place in fields 43, 45, 49, 42, 51, 55 and 57.
 Works will be taking place on Saturday.
- Infiltration works are continuing and expected to be completed on the 3rd July.
- Drilling is continuing on the site and expected to be completed within the next couple of weeks, determined by the archaeology works.
- Topographical walkover surveys will be taking place to the east of the site. These works will be completed on Tuesday.
- Excavator movements are expected to take place on Tuesday am. This is moving two or three of the
 excavators currently on the site from the northern Grove Road access point to the southern Grove
 Road access point to commence trial pitting activity working east. No traffic management anticipated
 to be required for these movements.

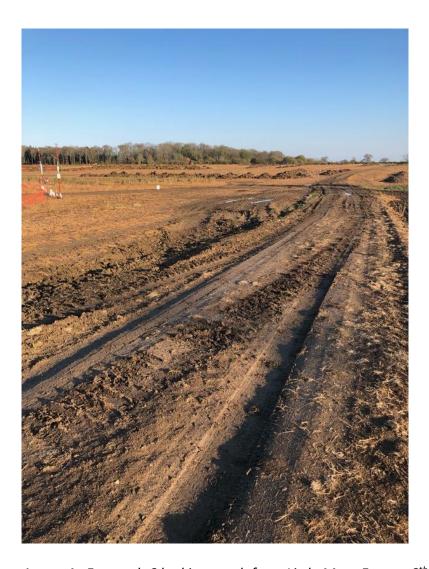




Annex 2: Looking North from Footpath 6 towards Field 58 where works taking place



Annex 3: Looking South on Footpath 6 towards village -12^{th} May 2021



Annex 4: Footpath 6 looking south from Little Moor Farm - 8^{th} May 2021



Annex 5: Open Trench adjacent to Footpath 6 on 12 May 2021 – note dead vegetation



Annex 6: Footpath 6 after rain on 9th May 2021



Annex 7: Workman's truck parked on Footpath 6 – 21st May 2021



Annex 8: Vehicle with bowser for infiltration testing on Footpath 6 on 25^{th} May 2021.

