

**Written Representation for  
SPR EA1N and EA2 Projects (Deadline1)**

**Interested Party: Elizabeth Thomas PINS Refs: 20023648 & 202223649**

**Date: October 31<sup>st</sup> 2020**

**Introduction**

I am a resident Friston and have concerns about the impact the proposed SPR development of two Sub-Stations and the National Grid sub-station will have on the small village of Friston.

In Compiling this representation full use has been made primarily of Chapter 26 Traffic and Transport, Chapter 27, Human Health and Chapter 30 Tourism, Recreation and Socio Economics.

**Summary**

This Written Representation deals primarily with the immediate area of Friston village and the impact the Scottish Power Renewables Development will have upon this small village. It deals with:

The potential loss of the ability of residents to move freely between home commercial, medical, educational and community resources.

The intrusive effects of the increase in traffic

The lack of clarity about the impact on Friston, in particular the Access points 12 and 13

The loss of neighbourhood leisure amenity

The SPR plans for which compel residents to follow SPR choice for resident's leisure facilities

- 1:Traffic effect on A12/A1094
2. Effect of traffic on A1094/Friston village
3. Accesses 12 &13
4. Health and well Being (Human Health)

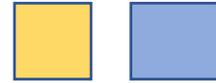
**Traffic effect on A12/A1094**

Any access to the applicants proposed area of development and this area of East Suffolk relies, in the first instance, on the use of the A12.

- The A12 road is a vital link for commerce, tourism and residents of East Anglia
- The A12 is becoming increasingly less than adequate for the volume and design of traffic.
- It has been identified as a route for upgrading by Highways England but as yet no plans are available. **Ref 1**

The proposed developments of housing commerce and tourism in Suffolk County Council Local Plan highlight that future demand on the A12 is predicted to increase. **Ref2**

- The proposal by SPR to build a sub-station plus the necessary associated infrastructure in this area of East Suffolk will create undue pressure on an already challenged route.



- What mitigation measures will SPR put in place to deal with the additional increase of traffic upon the A12?

SPR suggest some mitigation measures at the Friday Street(A12/A1094 junction) to deal with the increase in HGV ie Rumble strips, signage and speed restrictions.

Suffolk County Council suggest these measures are not adequate to deal with the increased traffic demands possible and the extra pressure this will create at this junction. **(AoC-007)**

- What processes will SPR employ to monitor the traffic as a result of these alterations to the junction.

In the event of a blockage on the A12 or approaching the A12/A1094 junction diversionary routes are limited .

- What measures will SPR put in place to ensure the alternatives are not used as “Rat Runs”?

## **2.**

### **A1094**

The main route to access the area of the proposed development and in particular the Sub-Station site at Friston, SPR state they plan to use the access from the A12 on to the A1094 and thus to the various haul roads(RR-074) **Ref 3 OCTMP**

This area of East Suffolk is renowned for the many year round events from which the tourist and residents benefit. i.e. the Snape Concert Hall Snape Food Festivals, Art Exhibitions, Poetry Festivals, Aldeburgh Summer Carnival, Sailing Regattas, Golf to Tournaments, National Cycle events

These events provide much inward investment to the area.

- SPR must show they have taken all of this into account and indicate what contingency plans they have put in place in the event of traffic restrictions resulting from the increase in SPR traffic.
- SPR must show what contingency and reparation they will employ in the event their traffic plans cause cancellation delays and loss of revenue to the organisers.

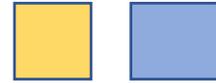
Speed restrictions on the A1094 range between 40/30mph along the narrow winding section from Friday Street and Snape Crossing.

Continuing beyond this junction towards Aldeburgh restriction is 60mph with blind summits and corners.

- SPR must show how they can ensure the safety of all road users.
- SPR must ensure the safety of cyclists and walkers crossing from footpaths on this road is not compromised with the increase in traffic associated with their development.

The narrow aspect of the A1094 especially at Snape Watering has the hazard of width restrictions between large vehicles.

- SPR must show they have taken into account the size of vehicles which may have to pass and negotiate the restricted dimensions of this road?



The A1095 is the main road to Aldeburgh, alternative routes are minimal routes those being severely restricted roads and lanes

Those routes are narrow and winding, with poor visibility, limited passing places, homes and gardens bordering the highway.

- How will SPR monitor and ensure all traffic associated with the development will avoid disturbance to those communities?

### **Traffic volumes**

SPR state there are some 333 employees per day, which will add adding significant pressure to already heavily used roads in particular the A1094 and B1069.

Additionally there will be the movement of HGV to and from the site plus the many ancillary vehicles servicing all aspects of support for such a development.

Total vehicle numbers involved in the development are unclear.

The tables 20.19 and 20.20 Chapter 26 Traffic and Transport do not reflect all the vehicle numbers with 20 months not included in the chart.

The ability to cross refer with figures in Appendix 26.13 **Ref APP-539** or match traffic numbers is not easy due to the manner in which the charts are presented.

Cross reference or correlation of the figures unmanageable.

- SPR must produce figures which give clear and precise information about the volumes and designations of vehicles they intend to use.

SPR have previous experience of the vehicle numbers associated with a development of this size when they undertook EA1.

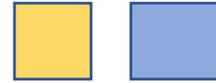
- It is not unreasonable to expect a full traffic plan based on their previous experience
- Why have SPR not produced more detailed and coherent figures regarding the movement of traffic associated with this development?

It is evident from the grids in Appendix 26.13 **App-539** a significant amount of material is required for such a development at Friston.

- SPR must show how the requirement for materials relates to traffic delivering to the site.
- SPR must ensure information enables correlation between all the charts and they are accessible and clear enabling full understanding of the volume of traffic

A development of this size will require a significant Traffic Management Plan available from an early stage.

- Why has SPR not yet produced such a plan identifying all contractors in the operation of the Traffic Management Plan?



## Impact on Friston Village

Human health Chapter 27, **APP-075 Ref 5**

SPR state

- *. The areas within and in proximity to the onshore development area are predominantly rural in nature typified by small villages and hamlets and individual residential properties. The landfall and first, approximately, 3km of the onshore cable route fall within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). The onshore cable route itself runs to the south of the villages of Aldringham and Knodishall Common, with the onshore substation and National Grid substation being located to the west of Knodishall Common, **and to the east of the village of Friston, on agricultural land between them.** The nature of the area is rural, with Knodishall Common and Thorpeness containing the largest concentration of residential properties. The onshore development area is shown on the figures associated with this chapter*

Ch 27 Human Health P.39 27.5 Existing Environment APP-

- Within the above text the reference to Friston Village in relation to the Sub Station is the incorrect.
- Walking due North from the centre of Friston Village will be the site of the Sub-station not East as stated above.
- This incorrect reference conveys the impression the Village of Friston is some distance from the Sub-station site, thus not affected.

The Work Plans APP-011 and Access to Works Plans APP- 012 omit the total village of Friston in relation to the SPR site. These plans show only a few properties of the village.

Friston has some three hundred houses in the village and a significant community associated with them.

- Why has SPR given the incorrect position of the sub-station in relation to the village?

### 3.

#### **Pre Construction Road Access 12**

During early PID the information given about the outline of red line boundaries on the SPR plans was they indicated the extent of the Works Areas .

The red line adjacent to and following the Bridleway .from Friston Grove Road to Knodishall labelled as a “Pre Construction Road” only appeared in January 2020.

Prior to that there was no labelling of this road.

A Pre Construction road, by the very nature of the name indicates it will be used to prepare the site “pre-construction”.



- SPR must explain why this road and its use was not made clear to the residents of Friston from the very beginning
- Why was it initially shown as a thin red line incorporated into the boundary of Works
- Why was it labelled “Pre Construction Road” much later in revised submissions and then redefined as a double line. This in January 2020 **Access to works Plans Sheet 6 of 12**
- Why are there no clear details of the purpose of this road?
- Why are there no designations of vehicles and amount of vehicles attached to the road usage?
- Why was the road partially obliterated on the work sheet?
- Why was the works plan not extended to incorporate the whole village thus showing the relationship of the road to the village and the impact it will have on the village

Access to the Pre construction road will be from Grove Road (Access 12)

Three routes provide access to the Pre Construction Road:

- Through the village from Grove Road South.
- Approaching from the North on Grove Road
- Church Lane

All these routes are narrow roads with :

- obscure driveways,
- house walls bordering the road.

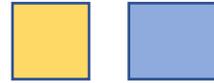
Grove Road is:

- adjacent to a childrens’ play area
- an unfenced playing field
- borders a village bowling green
- Close to the Village Church [grade 2\*]
- A working farm entrance
- Sandlings Walk
- National Cycle Route

It is inconceivable that a road should be constructed at this point in the village

SPR must make it clear why they did not:

- Depict clearly on their Works Plans the proximity of all the village to their intended development.
- Show the complete plans for Access 12 at the start of their Consultation Process?



Grove Road Friston Proposed Access to Pre-Construction Road at Access12

### Access 13

In addition the purpose of and the vehicle access to Access13 is unclear

Conflicting statements in chapter 26 Traffic and Transport appear

SPR state all NG works traffic will access the NG sub station works from Access 10

Chapter 26 Traffic and Transport Environmental Statement **APP-074 Ref 6**

This is contradicted Chapter 26 Outline Travel Plan Table **APP-588 Ref 7**

*“\*\*National Grid Employees will utilise access 10 until such point as access13 is constructed .  
Once access 13 is constructed National Grid employees would then switch to utilising  
Access13 “*

SPR must clarify the purpose and the volumes of vehicular traffic planned at Access13

- SPR have stated there will be no HGV using the B1121 through Friston
- This does not restrict all other SPR construction vehicles from Friston

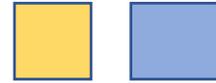
*“However the OTP does not prescribe the routes along public roads to be used by employees to reach access locations”. Outline Travel Plan **App-588 Ref 8***

- Why have SPR failed to create a travel plan for all other vehicles other than HGV
- Why have SPR directed NG employees to Access 13 accessible only from Friston or the village of Sternfield.

It is apparent Friston will experience high volumes of traffic which might not be HGV but many other non HGV vehicle movements associated with the sub-station and NG development.

- SPR must make it clear exactly what type of vehicles and volumes of traffic will be using the roads and lanes in Friston.
- What monitoring processes will SPR put in place to assess the effect of this increase of traffic in the village?

The village of Friston is bisected by the B1121



This road is an alternative route from the A1094 to A12 at Saxmundham and from Saxmundham to A1094, regularly used by local and commercial traffic.

With the potential for increased use of this village road by the associated SPR Construction Traffic:

- SPR must show how they will monitor future flow of traffic
- How they will they assess the impact on the whole village
- What mitigation measures they will employ to ensure the safety of residents.

### **Severence**

Increase in traffic is a significant concern for the ability for the residents of Friston to carry out normal daily life.

As mentioned above the proximity of all the houses in the village has been omitted from any plans produced by SPR.

The village spans both sides of the B1121.

- SPR must show how they will mitigate any severance of the community as a result of the increase in traffic.

## **4.**

### **Health and Well Being**

SPR intentions are to close or divert footpaths in and around Friston will have a detrimental consequence on the well-being and health of not only the residents of Friston but the many visitors who enjoy the access to open spaces these footpaths provide.

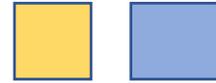
SPR plan to compensate the loss of footpaths running from Church Lane North to Little Moor Farm by re-routing the footpath to run adjacent to Grove Road.

Grove Road, a road used mostly by all local traffic, farm vehicles, delivery vehicles, cars, cyclists and horse riders.

- SPR must state why they consider it appropriate to encourage walkers to exchange the safety currently enjoyed on the existing footpaths for a situation where they have to negotiate blind corners, traffic, deep ditches noise and pollution.
- Why do SPR consider this diversion along Grove Road will in any way compensate for the quiet safe and tranquil footpath already enjoyed by many?

### Chapter 30 Tourism Recreation and Socio economics Para 265

*There are also five PRowS in the vicinity of the onshore substations which are classified as low sensitivity with regards the definitions in Table 30.10. TWO of these PRowS would need to be permanently diverted around the onshore substations, but the route would continue to be open and landscaping is being developed to increase the amenity value of the route. This will be agreed with the LPA post-consent and detailed in the final PRowS, secured under the requirements of the draft DCO. Proposed management measures are outlined in the OPRoWS (document reference 8.4), submitted with this DCO application, which the final PRowS will be based upon. Furthermore, the Outline Landscape and Ecological Management Scheme (OLEMS) (document reference 8.7) 11*



- Any Form of landscaping will take many years to reach maturity
- Construction activities will prevent use of the proposed footpath for many years
- Why do SPR consider it acceptable walkers should being forced on to a route alongside a road will compensate for the loss of the existing footpaths?

SPR make a direct link with car ownership in the community with an ability to access leisure facilities.

The footpaths around Friston are accessible without use of a car.

By removing these footpaths SPR are removing choices of the residents to choose where the wish to walk.

Plans proposed by SPR to compensate for the loss of the footpaths by creating an activity area set within a wood is no replacement for freedom of choice currently available.

- It is unacceptable that SPR should dictate how and where residents of Friston walk or take their leisure

SPR have must explain:

- Why they can justify the removal of rights for the residents of this area to continue to enjoy freedom to make choices regarding how they carry out their lives.
- Why has SPR considered it safe and appropriate to use small rural roads to direct commercial industrial traffic through small communities?
- Why they consider it acceptable that their plans for the Sub Station in Friston should bring unprecedented amounts of traffic of all designations to this small village?

### **Conclusion**

Safety and freedom in our lives are primary requirements to enable us to lead a full and worthwhile existence. By removing those elements and the restrictions imposed through such a development our ability to lead our lives will be damaged.

Access to this area of East Suffolk is limited but within the limitations ,residents, tourism and commerce thrive .

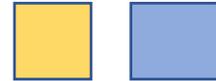
The diverse communities live and work effectively and take a great deal of pride in their communities.

Negotiating the rural nature of this area is sometimes demanding but worth the effort to have the enjoyment of living here.

Friston is not unique in its efforts to encourage that pride in its community which is strong. I firmly believe the need to retain the quality of this area not only for us now but for future generations .

Scottish Power Renewable are proposing to destroy the very heart of our village leaving in its place a concrete monster.

**E C Thomas MA Hons**



## Appendix

Ref 1	East of England route-based strategy evidence report 2014 4.7.1 Conclusion Highways England Route Strategy March 2017 P6-7 <a href="https://assets.publishing.service.gov.uk">https://assets.publishing.service.gov.uk</a>
Ref 2	2 <a href="https://www.suffolk.gov.uk/assets/council-and-democracy/our-aims-and-transformation-programmes/Agenda-Item-10b-Suffolk-framework-for-Inclusive-Growth-Appendix-1-1.pdf">https://www.suffolk.gov.uk/assets/council-and-democracy/our-aims-and-transformation-programmes/Agenda-Item-10b-Suffolk-framework-for-Inclusive-Growth-Appendix-1-1.pdf</a>
Ref 3	Page 57 Non-Technical Summary Traffic and transport Para 159 Chapter 26 Traffic and Transport Page 10 Table 26.4
Ref 4	Appendix 26.13 Derivation of Construction Material and quantities And Associated HGV Demand
Ref 5	Chapter 25 Human Health Page 39 27.5.1 para 117
Ref 6	Chapter 26 Traffic and transport Table 26.22 and Para 213
Ref 7	Chapter 26 Outline Traffic Plan APP-588 Ref 7
Ref 8	Outline Traffic Plan Page 5-6