



**FRISTON PAROCHIAL CHURCH COUNCIL**  
**RESPONSES TO WRITTEN REPRESENTATIONS FOR**  
**SPR EA1N AND EA2 PROJECTS (DEADLINE 2)**  
**PINS Refs: 20023636 & 20023639**

**INTRODUCTION**

We have reviewed the Written Representations following Deadline 1 with particular attention to those of Scottish Power Renewables (SPR) and the inputs of Suffolk County Council (SCC) and East Suffolk Council (ESC) especially those contained within the Draft Statements of Common Ground and their Joint Local Impact Report. Since that time there has been an Annual Parochial Church Meeting much delayed by the Covid-19 restrictions and conducted virtually. Attended by the members of the PCC and parishioners, there are certain points of emphasis and outstanding concern. These reflect our wish to focus on the care for the pastoral, physical and mental health of our community.

**STATEMENT OF REASONS**

7.16 Compelling case in the public interest (section 122(3))

We emphasise that we are NOT objecting to the development of offshore windfarms in the North Sea 'to meet the need for energy generation and combat anthropogenic climate change'.

We acknowledge there will be potential (as yet unquantified) socio-economic benefits to the coastal ports of Lowestoft and Great Yarmouth as service hubs and for supply chains for the offshore fields.

These are not imperilled by our objections to the establishment of a connection hub for this and other potential projects at Friston. The choice of site is inappropriate and flawed.

We are opposed owing to the countervailing losses with which we are faced in this area:

- The destruction of our historic landscape of natural beauty which has survived over 1,000 years.
- The loss of valuable agricultural land.
- The associated environmental damage.
- The considerable mental stress already caused to residents of local communities and especially to those of Friston.
- These are exacerbated by the uncertainties of the cumulative impacts of future energy projects which are in the public domain stretching over a period which could be up to fifteen years and includes the transformative construction of Sizewell C.

**SOCIO-ECONOMIC ISSUES**

We express deep concern that these do not receive the degree of attention that they merit and are reflected increasingly in government environmental and planning concerns for enhancing physical and mental health and wellbeing. These are especially important as our communities continue to suffer the consequences of Covid-19 restrictions.



We have been deeply concerned at the insensitivity of SPR throughout the process so far. Refusal to consult at the outset and ignoring requests to address our concerns hitherto and their dismissal of these in the DCO application as 'not significant', 'negligible' and 'temporary' for their project alone which could extend over seven years never mind their refusal to address more seriously the cumulative impacts.

### **Responses to ExA WQ1: Appendix 13: Tourism Impact Review – Scottish Power Renewables (SPR).**

It remains unacceptable that SPR still fail to address fully the considerable potential socio-economic impacts of their proposals combined with those of Sizewell C and other projects under consideration.

The independent report commissioned by the Suffolk Coast Destination Management Organisation (DMO) estimates

- The cost to the tourism sector at least £24million pa
- Putting at risk at least 400 fulltime jobs which far exceed the projected 250 jobs estimated by SPR during the construction period and would have to be sourced from outside of the area and in turn
- Impact adversely on inward investment and risk to local employment.

Instead SPR have produced inappropriate desk-based research by Biggar Economics. This is a consultancy based in Edinburgh and we have considered their reviews of the socio-economic impacts of Scottish offshore windfarms. These reviews embrace the overall national and local benefits of manufacturing, construction and support. In England much of that infrastructure is in place so we are uncertain where the major investment benefits will accrue.

We consider their more limited desk-based research inappropriate for the following reasons:

- The focus is on employment data when visitor spending is crucial as indicated above.
- The study areas are not comparable.
- The visitor catchment area for the SPR development extends to London and the home counties and the Midlands which are more highly populated and
- Tend to be more affluent which would impact on level of spend.
- They are attracted by the greater diversity and richness of amenities and facilities (recreational, cultural, events and festivals, land and seascapes).
- These are catalysts for inward investment via homes for retirees, increasing numbers working from home, second home owners leading to associated economic benefits for the construction, service trades and hospitality sectors.
- Unlike at Friston, the connection points/substations are many miles inland from the onshore entry points reducing local disruption.
- Whereas here the cabling sprawls across a confined area disrupting access to the countryside.
- This will extend over several years depending on sequencing of these projects and others under consideration.
- All whilst Sizewell C is under development.

There is no assessment of the connectivity to other important visitor attractions. Of prime concern is that Friston is on a tourist route which helps sustain its community. It is close to the Snape Crossroads, A1094/B1069, the latter providing important access to the Snape Maltings arts complex;



the scenic route to historic Orford, Butley Creek, Rendlesham Forest; Sutton Hoo historic site and Woodbridge. There are concerns for accessibility, congestion and safety (Snape has its own primary school).

Most of all bearing in mind the sums involved the study should take account of the interconnectivity of other relevant issues, not least traffic and transport; access to footpaths and ability to move around the area; air quality and other matters relating to human health and wellbeing.

## **DRAFT STATEMENTS OF COMMON GROUND WITH EAST SUFFOLK COUNCIL (ESC) AND SUFFOLK COUNTY COUNCIL (SCC)**

We note that there are considerable outstanding concerns of the two councils and we shall monitor these through the Examination process (and that Human Health will be addressed at Deadline 3). These include issues relating to socio-economic importance, but also

### **Public Rights of Way (PROWs)**

We endorse the Councils' wish for an overarching assessment of the relative importance of the PROW network and which should reflect the actual value and sensitivity of the network as a whole.

**A major outstanding concern is the loss of Footpath 6** (heading north opposite the Church) which is the major walking route for residents and visitors. It has been established by SCC as a Heritage Asset of some significance in its own right following the Pilgrims' Route and connecting to local historic sites such as the old Buxlow Church. It is suggested that this recreational route be replaced by a circular walk around the industrial site. In addition, it is suggested to have a recreational field – hardly adequate compensation or mitigation. Indeed, it rather smacks of a recreational space at Colditz bearing in mind that the village is likely to become isolated during the construction work.

### **Long Term Management of the Site**

We note that the Applicants do not agree with the Councils' request for the establishment of a community liaison group to provide a forum between the site operators, local community and Councils regarding the management and operation of the site. Significant changes to the landscape, amenities and characteristics of the village are proposed which will be long-lasting requiring careful management. The community is concerned to identify responsibilities and accountability to avoid abdication and neglect. It is the developer's responsibility to ensure there are protective measures. Their rejection of these proposals is seen as symptomatic of their lack of care for their impacts on the community.

## **ESC AND SCC JOINT LOCAL IMPACT REPORT**

### **S12 Built Heritage**

Following from the previous section, we note that it is the Councils' view that *'the destruction of the historic parish/Hundred boundary and footpath will therefore result in the loss of a non-designated heritage asset and cause harm to the significance of the Grade II\* listed church'*.

*'The inter-visibility between the church and other buildings surrounding the village centre is an important part of the church's significance'*.

### **Mitigation**

We note that *'it is the councils' view that the effects on the settings and significance of the heritage assets....cannot be adequately mitigated by virtue of the planting proposed'*. The inadequacy of the planting proposals which have been SPR's sole offer of mitigation have been seriously challenged



elsewhere within the Draft SoCG and most critically within the SCC Rapid Historic Landscape Assessment (Appendix to Joint Local Impact Report).

### **Compensation**

The Friston PCC notes that in S12.22 of the Joint Local Impact Report that *'the Councils have requested that the Applicants provide appropriate compensation to offset the heritage harm. The Councils have discussed with the Applicants the provision of a fund for heritage assets which would provide the opportunity for funding to be made available to pay for works to be undertaken to the affected assets, particularly the church'*.

**The PCC regrets that these discussions have been taking place without reference to them since it is the PCC'S view that acceptance of such compensation would be a betrayal of all that Friston Church has stood for in its 1,000 year history and of all those who have supported the church and its values. It is felt that there can be no compensation for the loss that our village community is facing.**

### **S20 Socio-Economic Impacts**

We note that within this, there are references to potential impacts upon tourism and recreation from Sizewell C during construction and cumulative impacts. Besides the impacts on tourism noted above, we note the potential for cumulative pressures on the local labour force, reduced availability and the need for more non-home-based workers travelling into the area.

**20.19** *'Typically with significant infrastructure projects, the potential positive benefits are regionally felt whilst the negative impacts of the development are felt far more locally'* which will be dramatic and irreversible for the local communities and Friston especially.