

Deadline 7 submission

My reference:

EA1N 20023282

EA2 20023287

Dear Mr Smith and Colleagues

1. Further to my deadline 5 submission and the ExA's written questions to the applicants. I write to respond to SPR's answers dated 24th February 2021 in particular in relation to my property [REDACTED] which are misleading and inaccurate.
2. Generally, I adopt and endorse the submissions of SASES and SEAS and I do not repeat submissions I have made previously.
3. In this submission I refer to the Applicant's response to EXA WQ2 Volume 5 and Volume 6.
4. I would draw to the attention of the ExA the persistent mis-description of my property by SPR. I first pointed this out during the "consultation process" and have done so numerous times since. SPR sometimes describes the property as "Moor Farm". Elsewhere they make observations wrongly assuming that [REDACTED] covers the adjacent but different property "Friston Barn". Generally their descriptions are confused and confusing. The fact that there is another Moor Farm which does form part of the examination, adds to the confusion. Originally the whole farm house and barn complex was called Moor Farm. It has not however been called that for over 30 years when it was split into two separate properties. The house, our property, is [REDACTED] h [REDACTED]. The barn is Fristonmoor Barn and is under different ownership. [REDACTED] Fristonmoor Barn and Moor Farm are different properties. "Friston Barn" does not exist.
5. In their answers to the written questions posed by the ExA SPR simply repeats the position it has taken in the past and fails to address the issues in the ExA's questions.
6. **First**, SPR says: "All three development scenarios would have adverse impacts of low magnitude on the significance of [REDACTED] in the historic environment both without or with the proposed landscape mitigation" They also say the developments would not obstruct the views to the Friston Church from "Friston Barn" and any severance of the view to the church from "Friston Barn" due to proposed screening would not materially affect the significance of [REDACTED] as a listed building.
7. SPR ignores the fact that development would completely sever the view from High House Farm to the church. When they make a point about this they – bizarrely - refer suddenly to the views from "Friston Barn". But even in relation to Fristonmoor Barn the point is obviously wrong and has no bearing upon the view from [REDACTED] [REDACTED] as they are two separate properties. Inspectors have seen the view: "*At the ExA*

site visit it was clear that the garden of HHF provided clear views across a largely open landscape to the church of St Mary Friston”.

8. **Second**, in relation to the placement of the NGET infrastructure, SPRs previous heritage assessment was based upon an assertion that it would be 450m to the South East. Now SPR has had to admit that the garden fence of [REDACTED] would be in close proximity to 3 sealing end compounds about 230m away. But despite this admission SPR doggedly sticks to its assessment and conveniently ignores any issue about the NGET infrastructure blocking views or that it would sever any historical connections between High House Farm and the church. Instead – and once again bizarrely - they refer to “Friston Barn”.
9. **Third**, in relation to the design of the NGET substation, at deadline 5, I and others raised the issue of the SPR and NGET’s failure at this late stage in the examination to make a decision on either Gas or Air Insulation systems for the NGET substation. This decision makes a real difference in term of the impact, specifically because of the variation in height and footprint of the two types of substation.
10. In their response to the ExA’s question to:

“consider whether, a commitment should be made to one or other technical solution during the Examination, to enable the selected solution to be secured in the dDCO. If this is not possible, explain why and how the resulting uncertainty can be addressed “

SPR fails to address this in their answer. The answer of NGET simply prevaricates:

“ NGET recognises that GIS technologies are evolving and there may be potential options for greener GIS in the future. As such, NGET is keeping the GIS option open to allow for its use in the future if such technologies become available.”

The illusive nature of the answer means that the EXA should take the worst case scenario for the purposes of analysis. This is because neither SPR nor NGET will or can rule it out as a real possibility.

Both SPR and NGET fail to address the ExA’s question as to why a commitment cannot be made and secured as part of the dDCO and if this not possible why and how the resulting uncertainty can be addressed. In that case the ExA has no real option but, again, to proceed to evaluate the issue upon the worst case scenario.

11. **Fourth**, SPR has still failed to provide any map or illustration showing the entire substation complex, including the NGET infrastructure together with all the listed buildings around Fristonmoor, most especially the Church (which SPR seems to have deliberately omitted from its maps). Consequently, the relationship between these properties and the impact of the substations cannot be seen.
12. **Fifth**, in relation to mitigation SPR proposes an ‘additional’ planting area close to the south western boundary of [REDACTED]. They say that such planting would be adjacent to existing “woodland” planting within the boundary of the property and

provides “enclosure”. There is no woodland and no enclosure. The Inspectors have seen this area. We have a boundary with a small number of deciduous trees plus a small area of mainly straggly Ash trees some of which have already been removed because of Ash dieback. In any event there are clear views to both to the south where the sealing end compounds will be sited and to the south west.

13. **Sixth**, with regard to growth rates the ExA is aware that the ESC, SPS and the SASES’ expert describe the SPR growth assessments as “optimistic”.

14. SPR asserts that:

“ the rainfall amounts are likely to provide favourable consecutive growing years provided that short periods of dry weather/lower rainfall are monitored and mitigated by watering provision through the aftercare period “

15. Anyone who lives in this vicinity knows that the soil is claggy and badly drained. It is generally waterlogged in the winter and rock hard in the summer. SPR supports its case on cultivation with weather data for Ipswich. It does this to suggest that on the Friston soil trees and other proposed planting would thrive. The weather even between Aldeburgh, Snape, Friston and Knodishall is widely variable. The idea that the weather in Ipswich provides a reliable guide to anything *on the coast* will strike local residents as laughable. Friston routinely experiences very long periods without rain in the period April/May – September. In 2018 there was not a single day with rain here between the end of May and July. Winter can be dry too. We recently experienced three consecutive dry winters . The long and short of it is that the proposed mitigation is intrinsically likely to fail to achieve the growth rates claimed.

Yours sincerely

Fiona Cramb