



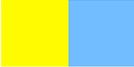
**SPR EA1N AND EA2 PROJECTS (DEADLINE 13)**  
**FRISTON PAROCHIAL CHURCH COUNCIL**  
**FINAL RESPONSES AND WRITTEN REPRESENTATIONS**

**PINS Refs: 20023636 & 20023639**

**Date: 5 July 2021**



This photograph captures the 'essence' of Friston – the approach to the church across a flower meadow especially planted by a farming family to cheer the people of Friston coming out of lockdown. Their antecedents have farmed in Friston for decades – the church stands reassuringly over the village; a haven for reflection and contemplation.



Behind the church you will find this





Pictures showing the proposed site for the developments following flooding in the village over 18-19 June 2021. The trenches are for site investigation works undertaken on behalf of the Applicants, SPR. These works have provided just a small foretaste of what will follow if the proposals are consented.

## **1 - Summary**

In this last submission we thank you sincerely for the courtesy, planning and attention to detail by the Panel and the Support Team in the conduct of the Examination.

We set out below outstanding issues and concerns which we wish to bring to your attention. In no way do these reflect on your conduct of the process.

- Protecting Our Natural Environment. (Point 9 of the UK Government Ten Point Plan for a Green Industrial Revolution). (S2)
- Continued objections to the site selection and impacts on landscape, heritage and environment. (S3)
- The need for an independent Design Review prior to consent. (S4)
- Mitigation planting. (S5)
- Rejection of Gas Insulation Switchgear (GIS) in view of SF6. (S6)
- Carbon footprint. (S7)
- Flood and drainage. (S8)
- Noise. (S9)
- Traffic and safety within the village. (S10)
- Cumulative impacts. (S11)
- Concerns regarding the Examination process. (S12)

## **2 - Policy Context**

The PCC is not opposed to renewable energy and fully acknowledges the opportunities for advancing offshore wind in the southern area of the North Sea.

Our opposition remains to the establishment of the three substations and associated infrastructure which will form connection points to the National Grid. These could be at existing sites or forming a new hub on a brownfield site.

We consider there is no conflict with UK Government and Church of England policies and commitments to achieve net zero carbon targets.

The UK Government Ten Point Plan for a Green Industrial Revolution (November 2020):



Point 1 – Advancing Offshore Wind confirms the need to ‘integrate clean technologies and to transform the energy system’ and refers to the concurrent Offshore Transmission Network Review to establish the strategy. The proposals should be considered as part of that strategic review.

AND

Point 9 – Protecting Our Natural Environment.

‘The natural environment is one of the most important and effective solutions we have for capturing and sequestering carbon long-term. We will safeguard our cherished landscapes, restore habitats for wildlife in order to combat biodiversity loss and adapt to climate change, all whilst creating green jobs’.

This underlines the important characteristics we attach to Friston. Protect the existing at little or no cost rather than spend millions on creating national parks?

Our own Diocese of St Edmundsbury and Ipswich recognises the environment and climate emergency in widespread commitments to net zero targets.

But we also have a duty of care in our pastoral role within the community who fear for the future.

We have reviewed recent submissions, primarily those of the Applicants, the statutory consultees and those of SASES (and its experts) and SEAS.

Frankly, we are dismayed to find so many outstanding areas of concern when the Examination should have ended on 6 April 2021.

### **3 - Site Selection, Landscape, Heritage and Environment**

The Applicants and National Grid should clearly understand that they have chosen a site of 30+ acres of industrial ironmongery in the heart of the Suffolk Heritage Coast, close to the Sizewell nuclear power station sites and ‘on the doorstep’ of what has been a small peaceful rural village.

The consequences and impacts of that choice in its location, design, construction, operation and potential for future expansion are magnified many times over than if it was located in a more remote or brownfield site.

These are quite legitimate causes of concern which demand greater sympathy and understanding in communication and responses than has been evident hitherto.

The site of the church and churchyard which extends back some 1,000 years conveys its sense of time and place. This is accepted by all parties even if the Applicants wish to destroy it for ever. The sweep of the countryside is lost by the severance caused by the



developments between the historic buildings to the north and the village and church to the south.

The existing pylon line, which does not make this an industrial landscape, will become more dominant and the impacts on the viewpoints exacerbated by the additional pylon proposed.

We note that both Councils and Historic England are opposed based on these considerations.

The SASES expert assesses the magnitude of the heritage impact on the church as high and the significance of its effect as major.

There is major damage to the environment and biodiversity with the loss of agricultural land and habitats.

#### **4 - Design Review**

We attach major importance to the design of the components and the site itself because it impacts on the visibility of the equipment within the landscape and impacts of noise, flooding and heritage and environment. The Applicants were offered the site some four years ago, yet even now the final design is said to follow consent. Surely this aspect which affects so much of the village should be more advanced. It would seem that the Applicants are being offered 'carte blanche' to proceed as they wish post consent without any sufficient consultation with the community to alter. What are the safeguards and who and how are these to be incorporated and monitored? We support what we consider to be a responsible requirement that the design proposals are subject to an independent review panel. The Applicants' emphasis is 'where most cost effective and efficient to do so' rather than attention to the environment and quality of life of the residents.

#### **5 - Mitigation Planting**

The design is integral to the mitigation planting. There are several uncertainties here besides the design. It is unclear as to the sequencing of the construction process, especially at Friston. We have seen estimates that these might stretch until 2028? On top of that are the sequencing consequences of further energy developments in various stages of consideration highlighted below.

But the implications are delays to the mitigation planting where in any case there are reservations concerning optimistic growth rates over a fifteen-year period. It is unreasonable that the community is to be exposed to this industrial site for such a potentially long period extending to 2043 or beyond.



## **6 - Switchgear**

We register concern that no final decision has been made between Gas Insulated Switchgear (GIS) or Air Insulated Switchgear (AIS).

Regardless of the lower footprint of the former, given the environmental concerns of SF6 it is considered that the use of GIS should be excluded.

## **7 - Carbon Footprint**

This in turn raises questions as to what exactly is the carbon footprint of the proposals and can these be justified? We rely on the Examining Authority to make a judgement:

- Excavation of the site
- Loss of natural sequestration
- Production and import of core materials, aggregates and cement etc to create the supporting base
- Manufacture of equipment
- Transport to site, pollution, wear and tear on highway infrastructure.

## **8 - Flood and Drainage**

You will be more than aware that the village suffered further flooding over 18-19 June 2021.

Whilst not directly attributable to the run off from the site – probably because the rain accumulated in the investigation trenches (see photographs above)! – it underlines what is an extreme safety hazard to the village. There is the potential for adding to the flood risk from the run-off from the site especially during the construction period which is estimated at least four years before full drainage management has been installed.

We note even now that the SASES expert argues that the Applicants have not demonstrated the viability of sustained groundwater infiltration nor outflow discharge to the local water course over the life of the development.

The community cannot accept the threat of additional flooding and the uncertainties should be removed and testing incorporated in the design process prior to consent.

The Examining Authority are asked to ensure that there is a robust management and control plan during and post construction

Historically, no one institution has accepted responsibility and accountability for the maintenance and clearance of the water course. Is it Suffolk County Council or the Environment Agency? This applies to the vegetation within the watercourse and accumulation of mud following flooding, especially around Church Path. In the end a resident clears and leaves a pile of residue for collection sometime later!



## **9 - Noise**

We are not technical experts but being so close to the village we expect there to be resolution of the disagreements between the SASSES expert and those of the Applicants and East Suffolk Council.

## **10 - Traffic and Safety**

We note that some form of accommodation has been reached between the Applicants and Suffolk County and East Suffolk Councils.

That, however, does not address the very real traffic and safety risks to residents. Mill Road and Grove Road are by-roads providing access to Friston and cut throughs to Sizewell, Saxmundham and Leiston as well as the proposed site.

These are not equipped to accommodate increased volumes of traffic let alone lorries and vans. We are already noticing increased traffic flows (and cyclists) which impact on walking and moving around the village.

The traffic movements arising from the investigative works provide just a small foretaste of what can follow. Indeed, you have received complaints and representations. These include

- Damage to vehicles from road signs
- Obstruction and disruption to access to properties on the boundaries of the site
- Damage to pathways and landscape.
- Reported 'near-misses' as site worker vehicles unfamiliar (unsympathetic?) with the rural roads exit the various sites.

Greater usage will arise with the coincidence of construction, Sizewell C and cut-throughs to avoid congestion elsewhere.

The reality is that lorry and van drivers are not all renowned for their interpersonal skills and patience. Friction and the risks of clashes, damage and injury are likely. We observed in site inspection reports that Panel members encountered safety risks when seeking entry to viewpoints.



## **11 - Cumulative Impacts**

Sizewell C alone will have huge disruptive impacts on communities within the area and we consider it unreasonable that major additional projects which take up so much land should be imposed on this limited stretch of the Suffolk Heritage Coast.

Just what are the proposals for the National Grid Substation and is the land of sufficient size to accommodate these?

It is certain that the preferred connection point for the National Grid Ventures, Nautilus Interconnector is at Friston since NGV has already booked the village hall for a public meeting in September.

The project requires a converter station on a 12-acre site within 5km of the connection point.

We know also that the Eurolink Interconnector is in the pipeline.

Just how certain can we be that the expansion of offshore windfarms does not lead to further connection points at Friston or the immediate area and all the attendant cable routes? We are told that the North Falls and Five Estuaries windfarm connection points are destined for unspecified alternative sites. In which case why cannot they accommodate EA1North and EA2?

In sum this highlights all the current policy deficiencies in proper planning, integration and coordination of all the energy projects – the economies of scale and pooling technology and expertise.

It is intolerable for Friston and nearby communities to suffer the prolonged strains and stresses of successive DCO applications – the digging up and further industrialisation of the countryside – and what for Friston would seem to be an unending construction period with no mitigation.

## **12 - Conduct of the Examination**

We emphasise that we have appreciated the detailed and courteous conduct of the Examination by the Panel and the support team in the most difficult circumstances surrounding the restrictions of Covid-19. These have necessitated remote working and virtual hearings.



It is irrefutable that the remoteness of the Examination has exacerbated all the disadvantages of the process for the local communities.

- The loss of human contacts within and between communities to help in promoting their opposition and the ability of other interested parties and participants to distance themselves from the very human issues.
- Less time and attention to detail when working from home and restrictions on site visits and contact.
- The loss of empathy with the surroundings and communities.
- Manipulation of the timetable by the Applicants and irregular/late submission of documents with insufficient time to digest and respond effectively.
- Communities feel especially let down by the lack of engagement with their concerns by the statutory consultees.
- These are all impediments to understanding and in turn how to manage the impacts of the proposals if they are consented.

At the time of writing, the project library has 3,311 documents and submissions. Included in those are 818 out of 878 Relevant Representations by members of the public and businesses. All these require varying degrees of reading and absorbing necessary for understanding and responding.

The Applicants have 'unlimited' resources and pay the costs of East Suffolk Council which is supposed to address all local concerns.

Local communities have to pay their own costs and do not have deep pockets so we support the protestations of SASES.

And these have a major damaging psychological impact on all those within the communities and at the heart of the proposals.