

## **Submissions of Ms Fiona Cramb at Deadline 13**

### **My reference:**

EA1N 20023282

EA2 20023287

1. I endorse all submissions made by SASES and SEAS .
2. I do not intend to repeat submissions I have made before and where I have not addressed SPR's comments rely on my previous submissions.

### **Introduction**

3. In these submissions I will address the following issues:
  - Matters relevant to High House Farm
  - Response to SPR comments on Deadline 11 submission (28<sup>th</sup> June 2021)
  - Assessment and land use mitigation
  - Public rights of way
  - Impact of ongoing ground investigation works and community engagement.
  - NDA's
  - General observations

### **Matters relevant to High House Farm**

#### ***Historic Environment and Heritage value***

4. I refer to the Applicant's comments on my Deadline 11 submission - Responses to ExA's further Written questions (REP11-143) (28<sup>th</sup> June 2021).
5. In relation to the Historic Environment of High House Farm SPR continue to repeat its contradictory assertions as to the importance of views of the property in assessing its Heritage value and the impact of the projects on that value. The applicant persists in underestimating the impact and effect of the development on the heritage value of High House Farm. I am grateful to SASES and rely on their commentary given at Deadline 12 on the applicants answer to the ExA's question 3.82:

“SASES has consistently challenged the Applicants' identification of the setting of High House Farm and their consequent assessment of the detrimental impact which the development of the substations and, especially, the establishment of the National Grid infrastructure, including sealing end compounds and the construction

of an additional pylon to the north of the substation complex. These elements will be in close proximity to the farm, and will have a detrimental effect upon its setting, as well as the impact of the wider substations and change of landscape character. At issue here is the contribution which the long views southwards towards the church makes to the significance of the farm, and SASES has consistently recognised these views as providing an important connection between the medieval core of the settlement (embodied in the church) and the outlying farmsteads which lie to the north, of which High House Farm is one. The existence of the ancient trackway and boundary which links the two elements, which has been recognised by the Applicants as a heritage asset in its own right, serves to emphasise this historical connection and allows the layout of the medieval landscape to be read and appreciated. The severance of these long views, whether by the construction of the substations and National Grid infrastructure and/or the additional planting, therefore has a detrimental impact upon the setting and significance of not only High House Farm, but also Little Moor Farm. The additional impacts of the proposals on the trackway itself have been addressed in previous submissions from SASES and others, including the latest statement from Historic England, which we wholeheartedly support.”

6. In relation to the impact and effect I rely on Dr Richard Hoggett’s Cultural Heritage Assessment in Appendix 2 of SASES Deadline 12 submission - Comments on the Applicants deadline 11 submissions in respect of ISH16, ISH17, Substation design landscape and heritage G I S addenda where he restates his assessment:

“I consider the applicants underestimate the impact on High House Farm, which should be recognised as an impact of medium magnitude translating into an effect of moderate significance.”

7. With regard to the reduction of the impact that might be achieved by application of the OLMP Dr Hoggett says:

“In the case of High House Farm, the applicant concludes that the proposals contained within the OLMP would reduce the impact on significance, but not sufficiently to change their assessment of impact. That is to say, that the proposals in the Outline Landscape Mitigation Plan do not actually mitigate the impact of the scheme on High House Farm.”

### ***Landscape***

8. The applicant persists in using Viewpoint 5 to illustrate its comments. As has been pointed out to them numerous times this viewpoint does not represent the view from High House Farm and the impact of the development upon us. In the Applicants’ Responses to Examining Authority’s Written Questions 3 Volume 7 – 3.10 Landscape and Visual Impact 3.10.2. The photograph they have used is taken from just about the most obscure and misleading point possible. SPR then uses this to support its claim that: "The Applicant noted a mature vegetated boundary to the south-west of the property near Landscape Visual Impact Assessment (LVIA) Viewpoint 5 during its site survey work in the area in February 2019 (see photo below), which it considered would provide some screening and a basis from which to justify further planting

around this boundary.” This is absolutely ridiculous. It is taken from Viewpoint 5 at the corner of our property, towards the house. Taking that view from the house misses the substation site completely. It is the views from the house towards the village that are relevant.

As Michelle Bolger SASES landscape expert in SASES Deadline 12 submission observes:

“In ExA question 3.10.2 they identify that ‘the garden of High House Farm provided clear views across a largely open landscape to the Church of St Mary.’ VP 5 shows a similar open view across to the church as that from High House Farm. In response to ExA question 3.10.2, SPR’s justification for enclosing this view by planting appears to be that ‘The Applicants recognise that this will have to balance various interests.’ It is unclear how ‘consultation with local residents ... to discuss their expectations for landscape work in the vicinity of their properties’ can address this issue satisfactorily.”

### ***Mitigation***

9. SPR continues to talk blithely about mitigation as if it were a panacea to the all difficult questions of amenity. I can only repeat that common sense makes it clear that no mitigation could ever compensate or remove the devastating impact that this project would have, if consented, upon on our lives and those of our fellow villagers.

### ***Public rights of way***

10. The limited access to the footpath network during the ground investigation works has provided a depressing foretaste of the impact that will occur with the permanent loss of FR6 and the consequent loss of the circular walk across open farmland to Friston that we and many others currently enjoy. The proposed new routes will follow Grove Road closely and the edge of the substation sites huge and skirt the cable sealing ends. Once again resort to common sense tells one that this will be an unattractive route that few will wish to use.
11. Generally I endorse the submission of SASES on the loss of footpaths. The new proposed routes cannot compensate for the loss of an ancient and historical pilgrimage footpath across open farmland.
12. I support our neighbour Martin Cotter’s submission at Deadline 12 in relation to the rerouting of footpaths and the unnecessary creation of a new path skirting his property and ours detailed in the Outline Landscape and Ecological Management Strategy, Document Ref 8.7 SPR Ref EAIN-DWF-ENV-REP-IBR-000389 Rev 06. Page 130 of 131 OLMP Public Right of Way Figure 8 dated 11/06/21.
13. The new diverted PROW is shown coming through Laurel Covert, north to Fareacres then west across the field to Mr Cotter’s boundary halfway down his field. The new route then proceeds south round the perimeter of his field then west across the southern boundary of High House Farm then joins up with the existing PROW which carries on south to Friston. I agree with Mr Cotter that this new path is unnecessary

and serves no purpose. Its proximity to both our properties will be intrusive and the path is likely to be unattractive to walkers given the views will be dominated by the huge substation complex. The path from Laurel Covert should terminate at his field boundary and simply join the existing PROW.

### ***The negative impact of the exploratory works on Friston / community engagement***

14. SPR simply ignores the complaints of locals and resorts to platitudes and mantras. The simple reality is that during this period of so called minor exploratory works there has been noise, dust, bad parking on Grange Road and the desolation of paths which surround Friston and connect it to other paths and dwellings.
15. These works which are minor relative to what might come have caused widespread despair and bewilderment in the area when contemplating the possibility of the chaos to come.
16. In its replies to items 7 and 8, concerning my objections to the hopeless community engagement, SPR has nothing to say except to accept that it can in its view only give notification on the day prior to activity. This is nonsense, but if true is an important matter for the ExA to take into account when considering the impact of these works on the residents of Friston because it means that the local residents cannot protect themselves against SPR's planned works since – to use SPR's term – they are “*dynamic*” - which is another way of saying that SPR cannot be bothered to give the local residents notice.
17. SPR's answers in any event simply assert that there has been little noise and dust to which I can only say that they were not living adjacent to these works whilst they were ongoing and their denials are meaningless.
18. SPR also says that the works were “*relatively short term activity*”. These works have been proceeding now for many weeks and are planned to continue August and this is not “*short lived*”. At all events they provide a devastating foretaste of what is to come. I would note that in response to observations by others, for instance Martin Cotter, who in his deadline 11 submissions referred to his despair and anguish, SPR says “*they have no comment to make on these matters*”. In truth there is nothing that they could say.

### ***Vicinity of works***

19. In relation to item 4, SPR sates at the end of its answer that the works relating to the overhead lines and on construction works are “*not in the vicinity of Ms Cramb's property*”. This is a bizarre and disingenuous statement when an industrial infrastructure larger than Wembley stadium is being planned for construction within a few hundred metres of my garden fence and will inevitably involve vast upheaval in the space between the works and the fence.

## **NDA's**

20. I endorse the submission made on NDAs by SEAS. A huge part of this examination has concerned the on-shore impact of the applications. Because of SPRs gagging policy the Authority will have received only a fraction the evidence that it would have received. Therese Coffey MP has described SPRs practices as “sharp”. We await the ExA response to these submission's and the issues that they raise.

## **General observations:**

21. *Benefit to East Suffolk:* SPR answer (Comments of Jocelyn Bond submissions 28<sup>th</sup> June): The ExA will note that SPRs answer implicitly accepts that there will be no benefits to this area; it rests its case upon supposed benefits to Lowestoft and Great Yarmouth. This places into context the decision of East Suffolk Council to go “neutral” having been paid by SPR a sum which in overall terms is a tiny fraction of the harm caused to East Suffolk.
22. *Split decision:* I strongly endorse the submissions of others that a split decision is the way forward. Such a recommendation would enable SPR to take forward its plans, it would give BEIS the chance to ensure that all on-shore issues are considered in the round; it would mean that SPRs policy of preventing landowners and others from participating in the inquiry, which Dr Therese Coffey MP described a “sharp” practice does bear fruit in a way which undermines the planning system.
23. *Cumulative impact:* I adopt what has been said by others on this. The answers given by SPR seem intended to confuse and hide the true picture which is that SPR knows full well that there are many other plans which would seek to link to Friston if they are given consent in relation to the present applications.
24. *National Grid:* There has been a deliberate non-engagement by National Grid in this inquiry. Surely, SPR and NG by this tactic of not engaging cannot be allowed to win an argument about cumulative impact. The judgement of the High Court in Vanguard suggests that bodies such as NG and SPR ought to be provided the Authority with all of their internal documentation as evidence.
25. *Extension of the examination:* The decision to extend the examination with no warning to those of us opposing the plans handed an unfair advantage to SPR with their unlimited resources and was procedurally unfair. As one Friston resident said it was already a David versus Goliath fight but then David had his slingshot removed.

## ***Conclusion***

26. We as a community have been fighting these plans for three years now. From the outset the strength of opposition to the siting of the onshore infrastructure at Friston will have been clear. This is for the common sense reason that it makes no sense to position a vast substation in the midst of a village, especially when so many better solutions exist, as indeed the government recognises. The only sensible solution to these applications is to grant them partial consent, for the offshore elements and to

then require a far better and less damaging and environmentally unfriendly solution to be found for the on-shore issues.