

Substation Action Save East Suffolk (SASES) - EA2 and EA1N Phase 3.5 Feedback

1. Onshore Substation Site Selection

- As SASES has previously commented in earlier consultation phases, the information provided by SPR, notably the summary RAG assessment, is flawed and incomplete. This is by SPR's own admission. For example:
 - as SPR states “*the RAG assessment does not take into account development cost, engineering feasibility etc. and is only one element of a wider decision-making process*”. Therefore SPR cannot carry out a meaningful consultation exercise based on the limited information provided
 - The RAG assessment for Broom Covert was not made available as part of the Phase 3.5 Consultation Information document, nor was it provided before or at the public meetings. It was not published on the SPR websites until after the public meetings and even then SPR failed to alert anyone to its existence. Was this the result of incompetence or deliberately underhand?
- Leaving aside its flawed nature, the RAG is incorrect in a number of respects e.g. on the criterion of “Highway access (construction and operational)” this is shown as red for Broom Covert, despite the fact there is an existing HGV route alongside the site. In contrast this is shown as green for Friston for construction although SPR's own plans show there is no direct access to this site and SPR have had to remove the route through Sternfield for very obvious but unstated reasons.
- Further, SPR has had to extend the search area to provide for a permanent access road despite the fact that part of the land needed for this route is not available for purchase. Accordingly, when this Highway Access error is corrected the red score for Broom Covert is 0 and that for Friston is 4.
- SASES has carried out its own independent RAG assessment for the two sites using SPR's criteria and informed by local knowledge. The results show scores as follows:

Broom Covert, Sizewell :	0 red, 17 Amber, 29 Green
Grove Wood Friston :	2 red, 22 Amber, 22 Green

For further detail, the reader is referred to the enclosed RAG Assessment - Substation Results document.

Clearly, by this corrected assessment, of the two options proposed at Phase 3.5, **Broom Covert, Sizewell should be the preferred site.**
- SPR has carried out a consultation purportedly based on the design of the substations. but in a public statement has admitted that no substation design work had yet been carried out, nor design consultants appointed. SPR has merely replicated what it built earlier somewhere else. This “Blue Peter” approach to consultation is unacceptable and negates a meaningful consultation.
- No meaningful landscape assessment has been carried out by SPR. SASES commissioned an independent landscape assessment comparing Friston to the Broom Covert site of which the Executive Summary is enclosed. The key conclusion is “*Our assessment has concluded there will be significantly less harm to existing landscape character and visual amenity if the substations were located on the EDF site. The siting of such infrastructure in a landscape that is already characterised by large scale energy infrastructure would reduce their incongruity and limit the harm to the landscape. In contrast the landscape surrounding the Friston site has a deeply rural, unified character, with limited intrusion from modern development. The substations could not (emphasis added) be accommodated without significant harm to the local landscape, the setting of the village*”

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and the visual amenity of the residents of Friston". This conclusion has been reached after considering the AONB status of the Broom Covert site.

- The independent landscape assessment also states at paragraph 1.26 "*We do not have confidence in the site selection process undertaken by SPR because, with regard to landscape and visual effects, it is not transparent and is marred by buried unidentified assumptions*". Please note the above are the views of an experienced firm of landscape consultants, commissioned to prepare an **independent** report.
- The visualisations provided by SPR are incomplete and those which show the greatest impact on the landscape have been omitted. SPR's own representative publicly admitted this when questioned about the visual impact from Grove Road. Further, no visualisations have been prepared from the above to show the overall impact on the landscape.
- The Broom Covert site is immediately adjacent to Zone 3 which, as indicated by SPR's own consultants, is a highly unattractive site characterised by existing energy infrastructure and intensive farming. This zone should be reconsidered.
- There is no analysis of the ability to build on an AONB and that takes into account that this is permissible if there are exceptional circumstances. There are many exceptional circumstances in this case including:
 - the presence of existing large-scale energy infrastructure, nuclear and wind
 - the fact the site lies between such infrastructure and Leiston industrial estate
 - the presence of an HGV route adjacent to the site
 - the fact that cables will come ashore in an AONB
- The implications of a six mile cable route to Friston versus a short route of just over one mile to Broom Covert have not been considered in the consultation document or site selection. Digging up six miles of countryside in rural and historic East Suffolk which receives many visitors has numerous implications including
 - an extended construction period with serious implications for major disruption and traffic congestion and pollution in an area with limited road infrastructure
 - resultant damage to the tourist economy
 - risk of delay given the likelihood of archaeological remains
 - ecological damage
 - cost
- The response received to many detailed questions put to SPR representatives in public meetings has been that the information will not be available until detailed assessments have been carried out as part of the Phase 4 Section 42 consultation. In the absence of proper assessments and information the site selection is inevitably flawed and the consultation is virtually meaningless.

2. East Anglia ONE North Masterplan Grove Wood, Friston

- This site is part of East Suffolk's rural landscape, untouched and unspoilt by development apart from the National Grid pylons, which are now an accepted visual feature.
- The landscape value of the site has been professionally assessed as being of greater merit than the preferred Broom Covert site.
- There is no confidence in the RAG assessment for this site, including the Green ratings for 'Landscape character and sensitivity to development' and 'Visual sensitivity to development'. These should be at least Amber, and probably Red. The visual montages,

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especially from the Village Green, provided by SPR support this. Also, there is no RAG rating for the capacity of the of the development to increase flood risk.

- The site would ruin the setting of Friston's Grade II* listed parish church due to its close proximity.
- The existing trees around the site screen it from areas of minimal population, whilst the site will be highly visible from Friston village, including its village green. Any proposed planting as mitigation would take decades to have effect.
- Parts of Friston village would be within Flood Risk Zone 3 as a result of runoff from the proposed site. Construction works would exacerbate this and there is no confidence in the SUDS solution currently proposed.
- The proposed site drainage works will destroy the village's Allotments.
- The unspoilt nature of East Suffolk countryside is a major tourist attraction and supports the local economy. Industrialising the site will seriously affect this in an irreversible way.
- The cable route will cause much disruption and damage over a wide area, all of which could be avoided by use of the Broom Covert site. In particular ancient woodland in the Aldringham Court area will be destroyed and this is a factor in a Red RAG assessments for the Friston site.
- The road system is not suitable for 'improvement' comprising mostly narrow roads barely two cars wide and widely used by cyclists and farm vehicles. This includes the A1094 from the A12 to Snape.
- Noise impact is a huge concern. The hum from the Greater Gabbard / Galloper substations would be totally unacceptable at the Friston site due to the very low existing noise level at night and outside the tourist/harvest season.
- Even as late as this Phase 3.5 consultation, no Cumulative Impact information is being provided by SPR in relation to this site, despite it being known to SPR that National Grid Ventures would intend to install its cables in the EA2/EA1N cable route if needed, and potentially may even choose to install its Converter Stations at the site.
- No meaningful information has been provided about the NGET substation planned for the site even though this would have similar impact to the substations. This phase of the Consultation cannot be legitimate without this information.

3. East Anglia TWO Masterplan Grove Wood, Friston

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4. East Anglia ONE North Masterplan Broom Covert Sizewell

- The area at and around Broom Covert comprises approximately 140 acres of land bordered by a large industrial Estate to the West, two Nuclear Power Stations (one being de-commissioned) to the East, largely non-productive agricultural fields to the South and scrub / heath and marsh to the North.
- The **general impression of the area** on arrival is of a wide urban road leading to an enormous industrial complex (c.500 ha) comprising:
 - visually "brutalist" and stark buildings (most notably Sizewell A Power Station) and the existing Galloper and Gabbard Wind Farm Substations at the Eastern end of the Broom Covert site.
 - 24 hour industrial scale lighting installations,
 - large vehicle access routes,
 - road furniture associated with industrial centres,
 - high volumes of traffic cars and trucks and the associated noise and light pollution
- A **cable and haul road route to Broom Covert** will have to run only a few hundred metres from the cable route to the landfall area, which already has adjacent access to overhead HV power cables
- Construction timescale and subsequent disruption will be limited to a smaller area.
- The site already enjoys mature screening on 75% of site perimeter
- Capital cost of construction will be much lower than for any other proposed site
- There will be no additional flood risk at Broom Covert since:
 - Working industrial drainage systems already exist
 - Land profile accommodates water run off
- The choice of Broom Covert will be relatively beneficial to the **economy in the local area**
 - Qualified trades already exist in the area of Leiston
 - Tourists to that area accept the existence of the industrial area and power generation complex, therefore no change to public perception of the area
 - Impact on tourism will be minimal

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- SASES does not accept the misleading claim by Suffolk Coast & Heaths (SC&H) - a non-statutory stakeholder - in its response to SPR's Phase 3.5 that *“the AONB Partnership consider a development at the Broom Covert site would have an adverse impact upon the tourism economy in the AONB that is worth £210,000,000 and supports 4,655 jobs”*. The latter figures are based upon SC&H's own estimates of the benefit to the Suffolk economies from tourism across the entire SC&H AONB, an area of 155 square miles, and apparently assumes that all the visitors and hotel bed occupancy within those 155 square miles are attributable to the attractions of the SC&H AONB. This is completely unjustifiable and forces one to question the credibility of the SC&H Phase 3.5 response to SPR. We cannot envisage that the installation of the proposed substations at Broom Covert close to the existing Sizewell Energy Complex would result in ANY significant loss to the County's income from tourism since the site is NOT part of the Suffolk Coastal Path (despite claims incorrectly made by others), is not open access and has significant substation intrusion impact at its south-eastern end.
- The choice of Broom Covert will be far less damaging to local **Communities** :
 - It will be in an area already perceived by the local community as an industrial development with employment opportunities
 - Nearby Leiston has a significant industrial character and industrial heritage
 - The well being of the Leiston-cum- Sizewell community is boosted by generous corporate support from previous and existing energy suppliers, for example support to schools, leisure facilities, commerce and community assets
 - Existing homeowners are accustomed to proximity to industrial units
- The Broom Covert option will provide much greater scope for the inevitable future **Growth** at the Sizewell energy hub (e.g. undersea interconnectors with Europe, increased output from wind farms).
 - Accessibility – this is relatively good with direct access to roads servicing existing power stations
 - The site enjoys significant amount of land (approx 60 ha)
 - Further expansion could be accommodated on the surrounding land if approached sensitively
- The landscape value of the site has been professionally assessed as being of far less merit than Grove Wood, Friston.
 - *All landscapes matter to someone - “European Landscape Convention 2006”*
 - *“Landscape is an important part of the quality of life for people everywhere, in **everyday areas as well as** in areas recognised as AONB”*
- A most relevant characteristic of Broom Covert is its proximity to a large industrial site.
- Broom Covert already has easy access by wide well maintained road networks with minimal disruption to surrounding communities
- Significant Levels of noise are already part of the environment at Broom Covert
- Existence of light pollution is accepted due to the proximity of Sizewell Nuclear Power Station, Leiston Town, Greater Gabbard and Galloper installations
- In comparison to sites further inland, the cable route to Broom Covert site would be far less disruptive or damaging to the environment
- As indicated by SPR Flood risk on Broom Covert site is not an issue due to existing industrial drainage systems being in place
- Since so few residents will be affected by the development at Broom Covert, the effect on the overall sense of well-being there will be markedly less than at the alternative site.

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- The large area of land at Broom Covert provides a significant opportunity for landscaping to mitigate the impact of the substation on the few nearby properties, as has been achieved at the nearby Galloper and Greater Gabbard wind farm substations.
- Access to such a large area of land available for development at Broom Covert and in its proximity to a major industrial complex could accommodate possible future expansion
- The AONB land in proximity to Broom Covert has no significant landscape merit in relation to other sites, and with careful strategic management existing habitats could easily be adapted.

In conclusion the area identified as Broom Covert is eminently more appropriate a site for the construction of a large industrial unit such as the Proposed East Anglia ONE North Energy Hub

5. East Anglia TWO Masterplan Broom Covert, Sizewell

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6. Broom Covert, Sizewell Site Considerations (re Sizewell C reptile mitigation)

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Whilst the consultation leaflet provides information concerning site requirements, it provides no information on a number of key points as follows.

- Zones 1, 2 and 3 should be considered for reptile mitigation, if not already so considered.
- If a site cannot be confirmed in the existing onshore study area will SPR look beyond the study area?
- Do Natural England and Suffolk Wildlife Trust accept and agree to the need to move to an alternative site when it is found, instead of allowing the remaining land at Broom Covert to be used?
- How and when will SPR reach a decision on alternative locations?

7. Traffic and Transportation

The following comments refer to SPR's EA2 and EA1N Consultation Information leaflet (September 2018) and Traffic and Transport Factsheet (October 2018). Where there is an inconsistency or conflict between these two documents, we have assumed that the later Traffic and Transport Factsheet represents SPR's latest and current intentions.

Our comments take no account of the cumulative impact on our roads from EA2, EA1N and any other energy projects that may be planned for concurrent implementation in this locality. We are asking our Local Authorities to prepare an integrated traffic and transportation plans that address all such developments.

- The Traffic & Transport Factsheet lists nine issues/ considerations / factors for Grove Wood option, but only two for Broom Covert. That in itself provides a very clear illustration that many and significantly more challenging issues such as those detailed below would have to be overcome should the substations be constructed at Grove Wood, Friston whilst access for HGV and other construction vehicles to and from Broom Covert would be an overwhelmingly simpler and more straightforward proposition.
- A suitable "tried and tested" road network for access via A12 / B1122 / Sizewell Gap Road to the existing nuclear power complex and to two operational Wind Farm Substations at Sizewell already exists.
- HGV access to and from Grove Wood is fraught with difficulty by virtue of there being no suitable links through the existing road network. The local roads in the Friston, Coldfair Green (Knodishall) and Aldringham areas consist of narrow B-roads and even narrower rural lanes, many with high hedges and in some cases adjacent properties that would need to be demolished or else severely affected by the noise, dust and disruption of construction traffic passing close by. SPR's intends to address some of these issues by upgrading existing roads and by supplementing the existing road system with unsightly haul roads running across countryside that is at present open and unspoiled.
- No information or data has as yet been released on the intended origins, volumes, types and frequency of HGV and Construction Vehicle movements that would justify the proposal to provide two different routes to landfall at Thorpeness (one via A12/B1122/Sizewell Gap Road and a second via A1094/B1122/B1353). We note that it was not been found necessary to provide such an alternative route when building Galloper and Greater Gabbard Wind Farm Substations.
- Neither have we seen information regarding the numbers or intended locations for Primary and Secondary Construction Consolidation Sites (CCS). Therefore it is not impossible for us to comment on the proposed routes suitability for access to Compound areas.

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- We ask that all HGV traffic (including CIL loads) going to the landfall site is routed via Sizewell Gap and the proposed cable corridor haul road between Sizewell Gap Road and the Landfall site. Accordingly construction of the latter must be prioritised in project planning so that it is available from the outset.
- The section of the B1094 between its junction with B1069 (Blackheath Corner) and Aldeburgh has been designated in the Suffolk County Council Lorry Route Network as a “Zone Distributor Route Directly to a Specific Location” (namely Aldeburgh) and it should not be assumed that it is also suitable for high volume HGV movements to further local areas such as B1122 between Aldeburgh and Leiston. It is not practicable for construction traffic to use the roundabout junction between B1094 and B1122 at Aldeburgh. This is already the single pinch point for all traffic entering and leaving Aldeburgh and visiting two supermarkets within a few yards from the roundabout. This roundabout is already congested at peak tourist times. Additional congestion and obstruction by construction traffic could effectively isolate the town of Aldeburgh and block access by emergency vehicles. It is hard to envisage acceptable alternative arrangements can be made for local residents living in the Leiston Road, Aldeburgh between the roundabout and Police Station, where residents have no alternative to parking their cars on the Leiston Road outside their houses.
- There is an accident black spot at the junction of the A12 and B1094. Numerous HGV movements can only worsen an already dangerous situation.
- We are pleased that SPR recognises that widening Aldringham Lane for two-way HGV working is not feasible without demolishing homes and that therefore this is not to be a HGV route. However, we are concerned at the prospect of widening B1353 Thorpe Road since this would destroy hedges and woodland on the AONB and greatly detract from the attractive gateway to the popular holiday village of Thorpeness.
- The Grade II listed building of Aldringham Court is a Nursing Home for the elderly. SPR’s intention to build a haul road for cable route access alongside Aldringham Court is of great concern. The destruction of gardens, ancient woodland and pasture on both sides of the Aldeburgh Road in Aldringham between Aldringham Court and Fitches Lane would destroy its present attractive setting. The passing by of HGV’s and Construction plant using a haul road next to this building and other nearby residents would destroy present tranquillity by creating an unacceptable level of noise, dust and visual disturbance to the great distress of all those residents.
- We are pleased that SPR has now stated that HGVs will not access a Friston substation site via Benhall, Sternfield or Friston. We request confirmation that this route has been completely eliminated from plans as a possible construction route.
- We believe the proposed HGV access to Friston sites via B1069 is unsuitable. Improvements to it would require widening that would destroy its rural aspect.
- In order to protect our local amenities we request that SPR confirms that HGV and Construction Plant movements shall occur only between the hours of 0700 to 1800 Monday to Friday and 0700 to 1300 on Saturday except in exceptional circumstances and only with the prior written consent of the Local Planning Authority.
- It is imperative that full use is made of on-board traffic monitoring equipment to control the movements of all construction-related vehicles.
- Use of Grove Road as a site access from the Friston village end should not be permitted (and controlled by traffic monitoring equipment)
- Fixed speed camera equipment should be installed on the B1121 in Friston village to reduce the incidence of speeding vehicles in both directions (which is already unacceptably high)

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8. Additional Feedback

SASES has made its views clear on numerous occasions: the consultation has been both flawed and poorly administered. There has been an over reliance on remote desk-based and contracted-in professional advice which has often shown inadequate knowledge &/or understanding of the landscape and sensitivities of the area. Whilst we welcome the inclusion of the alternative 'Sizewell' proposal to locate substations nearer to the coast, we would like to raise the following issues which have not been addressed:

- The Suffolk Coastal area with its peaceful rural towns and villages, small, winding country lanes and close-knit communities, together form a unique, tranquil offering which is the key factor drawing visitors to this area. For this reason, much of the area which includes Friston is unsuitable for industrial development on this scale.
- Construction traffic could paralyse an already overloaded road network, damaging tourism especially at peak visitor times: Easter, Bank Holidays, School Holidays, Aldeburgh Festival, Aldeburgh Food & Drink Festival, Latitude Festival, Folk East etc. Road improvements are seriously lacking. Local authorities and Central Government must successfully address road improvement issues before any industrial development is considered anywhere.
- The impact on **tourism** has been largely forgotten, especially the cumulative effect with other energy proposals. This is completely unacceptable when tourism is the most important feature in the East Suffolk/Suffolk Coastal economy. Local Authorities have failed to understand that they are failing the tourism industry by believing they can have both:
 - A successful thriving tourism offering, and
 - Plans for the Suffolk Coast to become 'The Energy Coast'
- There has been a complete absence of evidence of any guidance and leadership from Government, Local Authorities or The Suffolk Energy Coast Delivery Board and a total failure by Scottish Power and others (National Grid, Crown Estate, Suffolk Energy Coast Delivery Board and both local authorities) to properly **plan and co-ordinate** the onshore impacts of large-scale wind farm developments and other energy projects; if Developers continue forcing their onshore installations into this part of East Suffolk Coast, the result is likely to be disastrous for the area, its communities, businesses and tourism.

The stress and anxiety caused by these proposals is completely unfair, it hangs as a dark cloud over people's lives, homes and businesses. We would hope going forward local people and communities are shown respect and understanding.

END