



FRISTON PARISH COUNCIL



**RESPONSE OF FRISTON PARISH COUNCIL AND SASES TO THE
SCOTTISH POWER RENEWABLES PHASE 4 CONSULTATION for EA1N AND EA2**

This document is the formal response of Friston Parish Council and of a parish working party and residents' group known as SASES (Substation Action Save East Suffolk) to Phase 4 of the consultation process being conducted by Scottish Power (SPR). The basis of the consultation is the PEIR that SPR has prepared in respect of its proposed East Anglia One North (EA1N) and East Anglia Two (EA2) windfarm projects.

There are so many issues. This reflects the complete unsuitability of the village of Friston and the East Suffolk area as an industrial energy location. These are already having a major impact on the wellbeing of all the affected communities, particularly Friston which is now blighted, and, if these projects go ahead, will continue to be blighted for decades to come.

Friston Parish Council and SASES are not opposed to offshore wind power and recognise the need for renewable energy, but this should not be at the expense of the onshore environment. Accordingly, this response focuses on the onshore impacts.

The Parish Council and residents have limited resources, both in money and time, and nothing in comparison to those of a multi-billion-pound corporation such as Scottish Power and its owner Iberdrola. Accordingly, whilst a large quantity of SPR material has been reviewed, given the sheer scale of the issues this response cannot be considered to be complete or to highlight every single issue which is of concern to the community of Friston and the surrounding areas, including those affected by the cable route and the landfall. Therefore, Friston Parish Council and SASES reserve the right to raise additional issues and to refine the issues which are raised.

The following pages set out in greater detail the Friston Parish Council and SASES response, which is organised by the PEIR chapter headings. Given some impacts arise in more than one area of the PEIR there is an element of duplication. A summary is also set out below.

SUMMARY OF RESPONSE TO PHASE 4

1. **DEFECTIVE CONSULTATION** – SPR failed to consult with Friston at the outset, and with key communities such as Snape. The consultation was initially not well publicised and there is no evidence that SPR has responded adequately to previous consultation phases. The PEIR is defective/incomplete in a number of respects which casts doubt on the effectiveness of a consultation based upon it.
2. **FAILURE TO ADDRESS CUMULATIVE EFFECTS** – it is unclear whether the cumulative effects both in terms of construction and operation of all the EA1N, the EA2 and the National Grid (NG) substations have been properly assessed. The cumulative effects with SZC are cursory and out of date as they have been assessed by reference to EDF's Phase 2 Consultation materials. SPR has failed to address the cumulative effects of the National Grid Ventures (NGV) projects known as Nautilus and Eurolink, despite NGV starting to consult in December 2018. These projects will be built in a similar timeframe, they are intended to connect to the same NG substation and they will be built using the same area for landfall and some or all of the same cable route. SPR has also failed to address the substantial expansion of the Greater Gabbard and Galloper windfarms which were announced in October 2018 by the Crown Estate. Given the construction period of EA1N and EA2 may extend to 2031, construction of these proposed expansions will almost certainly start in this period, and given the current locations of landfall and onshore infrastructure, further substantial infrastructure will almost certainly be planned for the Sizewell/Leiston area.
3. **SEPARATION OF APPLICATION PROCESS FOR EA1N AND EA2** – it is grossly inefficient both in terms of time and resources for two almost identical applications to be made separately. This is particularly the case for parish councils and local residents. Such an approach seems deliberately designed to prevent the effective participation in the planning process of those with limited resources.
4. **POLICIES** -SPR has failed to address key policies of Suffolk Coastal District Council or Suffolk County Council.
5. **THE IMPOSSIBILITY OF MITIGATION/COMPENSATION** – despite SPR's attempts to pretend the impacts of these projects can be mitigated/compensated, this response demonstrates that this is impossible. You cannot compensate a community for at least 20 years of construction and landscape related blight. You cannot effectively mitigate for the industrialisation of the countryside in area surrounded by listed buildings and next to a rural village.
6. **DEFECTIVE SITE SELECTION** - site selection is driven by the connection point offered by National Grid in the Sizewell/Leiston area. Friston arguably is not even in that area. This site selection for the connection point offered by NG is not subject to any transparency, consultation or accountability. Further there has been no adequate explanation why the cable route currently under construction from Bawdsey to Bramford cannot take the power from EA1N and EA2 given the originally planned power capacity of that route. SPR's site selection process has been flawed from the outset based on a defective and incomplete RAG assessment.
7. **LIGHT POLLUTION** - Friston and many areas along the cable route are very dark at night. There will be many sources of light pollution during the construction period of potentially 7+ years both at Friston and along the cable route. Light pollution will continue after construction due to security lighting. This cannot be mitigated in a dark rural area.
8. **FLOOD RISK** – SPR's plans to address flood risk are unconvincing, both during construction and in operation, given the reality of previous flooding of properties in Friston. Those plans also cause further landscape damage and loss of valuable agricultural land.
9. **LOSS OF PRIME AGRICULTURAL LAND** – any loss of prime agricultural land should be avoided but there is a substantial loss involved in these projects, far greater than SPR has estimated. The loss of land is not just the footprint of the three substations and the access road. It is much more than that given landscaping, SUDs ponds, land fragmentation, cable ends, new pylons and margins around all of these elements.

10. **DAMAGE TO ENVIRONMENT/ECOLOGY** – Friston and many areas of the cable route are the habitat for a wide variety of wildlife. Habitat will be destroyed and deeply compromised both during the construction period and thereafter.
11. **DAMAGE TO HERITAGE AND ARCHAEOLOGY** – the substation site is ringed by five listed buildings including the village church (Grade II*). The setting of the village mill will also be damaged. Part of the site is a mediaeval common. The substations will effectively permanently close a footpath which is possibly an historic route to Middleton and Dunwich, site of a mediaeval monastery and one of the most important ports in England at that time. The cable route is also likely to be rich in archaeology. The cable route will also damage the setting of Aldringham Court (Grade II) and its grounds which were designed by Cecil Lay an important architect of his period.
12. **NOISE POLLUTION** - The PEIR indicates that there will be permanent noise pollution caused by the substations, and worse it is unclear whether the cumulative impact of the noise from all three substations has been aggregated. Further the NG substation is planned to house further plant for the Nautilus and Eurolink interconnectors adding further to the noise levels – see comments on the absence of cumulative assessment. SPR’s investigations of background noise are questionable at best. There is a failure to appreciate that residents spend a significant time outside particularly in the warmer months from May-September. A permanent and persistent background hum will represent a very serious loss of amenity and for some people, particularly those closest to the substation will make their lives unbearable. Noise from operation and construction will be even worse in what is a quiet rural area and where noise travels long distances.
13. **VAST INCREASE IN TRAFFIC** – SPR’s analysis of existing traffic levels is flawed having failed to take account of different types of traffic particularly goods traffic. None of the roads, the A1094, and the local B roads and country lanes can cope with increased levels of HGV traffic as they are simply not suitable for HGV traffic. There is a serious risk of “rat running” from all types of traffic including construction workers travelling to site. The roads in the holiday season, approximately from Easter to October half term are busier especially in the peak summer months when there are many events including the internationally famous Aldeburgh Festival and Latitude. There is a serious risk of congestion at the dangerous Friday Street/A1094 junction, at the Snape crossroads and the Coop roundabout in Aldeburgh where there are many parked cars in a busy residential area. The cumulative impact of SZC particularly on the A12 could result in major congestion on the A12 with the predicted number of HGV movements a day. This is before any traffic associated with the other four proposed major energy projects is added.
14. **DAMAGE TO HUMAN HEALTH** – wellbeing in Friston is already being adversely affected, and this will continue for decades to come with lengthy construction and unmitigated landscape impacts, noise pollution etc thereafter.
15. **AIR AND DUST POLLUTION** – this has not been adequately addressed given the nature of the top soil. Uncultivated land and stockpiled topsoil will create a great deal of dust particularly in windy conditions both at the substations site and along the cable route. Little account is taken of the impacts of diesel smell and pollution at the substations construction site which will reach the village and neighbouring properties.
16. **DAMAGE TO LANDSCAPE AND VISUAL IMPACT** – you cannot put 30 acres of industrial plant 15-18 metres high in a rural location next to a village and expect/pretend to mitigate it with tree planting. SPR’s assertions on this are suspect and contradictory and take no account of soil conditions or rainfall.
17. **DAMAGE TO LOCAL ECONOMY AND TOURISM** – there is a flawed and incomplete analysis of the nature of the local tourism economy. The number of jobs provided during construction is not material and there are none post construction. There is no offset to the damage to all types of commercial activity linked to tourism, holidays cottages and upwards. No account is taken of the fact the Friston area is blighted now will continue to be for decades given the construction period and the damage to the landscape etc. This will result in permanent damage to the village community given the demographics of the village and the need for new residents to move the village.

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INTRODUCTION

The PEIR is trying to justify the unjustifiable.

- It is self-evident that you cannot construct a 30-acre footprint, 15-18-metre-high piece of industrial infrastructure in the middle of the countryside, next to a peaceful village and ringed by listed buildings without causing substantial and permanent damage to the village community, the landscape, visual amenity, wildlife and the environment generally.
- There is no meaningful economic benefit either in the short term and certainly not in the long term to the area that is affected by these proposals. In fact, in all likelihood, the local economy, which is dependent on tourism, will be damaged.
- The construction period of the EA1N, EA2 and the National Grid substations could be seven years or more. The traffic, noise pollution, light pollution and the loss of amenity for such an extended period will have a significant impact upon the lives of local residents and yet no clear assessment of this cumulative impact has been carried out.
- This consultation response to the detail of the PEIR demonstrates that Friston and the six-mile cable route is the wrong solution to the location of the onshore infrastructure for EA1N and EA2. This view shared by Suffolk Coastal District Council and Suffolk County Council, all local NGOs and all local communities.
- It should be noted that these comments are made in respect of EA1(N) and EA2 both separately and cumulatively and although comments are made by reference at specific chapter the comments made should be taken as comments on the entirety of the PEIR.

CONSULTATION ISSUES

Scottish Power has failed to consult properly. This is evident from the PEIR, which in key areas (such as Project Description, Land Use and Landscape), refers to the consultation on the Scoping Report 2017. The communities of Friston and Knodishall and their parish councils were **never** consulted on that document despite being the communities which are now most affected by these proposals. There is no reference to that very serious omission in the PEIR.

- Omissions and errors in the PEIR are so significant, that they prevent meaningful consultation, as information that is needed for proper consultation has simply not been provided.
- The sheer volume of PEIR documentation, largely duplicated for the two projects, has deterred many from being able to properly inform themselves about the projects in advance.
- A major disappointment has been the poor quality of some of the documentation, including inconsistencies and in particular areas, its incompleteness.
- On questioning SPR representatives at PIDs, it became very clear that certain key aspects of the two projects as documented in the PEIR, had not yet in fact been firmed up. Two examples include Cable Corridor routing which is still indicative and with alternative routes shown along certain sections. The relative position of haul roads and cable runs within each Cable Corridor are not yet decided i.e. which side of the cable corridors is it intended that the haul roads should run?
- Key decisions such as even approximate sizes and locations for the Cable Corridor CCSs had not been published, making it impossible for the public to understand the likely impact of construction work and traffic in their own locality.
- The stock answer from those SPR representatives present was: **"We haven't decided that yet, please let us have your own views in your feedback on what we should do"**.
- It is unacceptable that SPR are stating that many major decisions on top level design parameters have not yet been taken, given that this is the final round of consultation prior to DCO submission.

- Following Consultation Phase 3.5 debacle, after which SPR admitted that material comments from the general public regarding the merits/demerits of Broom Covert and Grove Wood sites had not been taken into account by SPR, residents lost confidence that SPR would take any account of views expressed by the general public. During Phase 4 PIDs, representatives of SPR were at pains to state that this would not be the case at Phase 4, but residents continue to believe that SPR will not take their comments seriously.
- The Statements of Community Consultation (SoCCs) state that during Phase 4, "SPR will directly consult with Statutory Consultees and the Prescribed Consultation Bodies (for example the Marine Management Organisation, Natural England, the Environment Agency, etc.), local authorities and landowners".
- However, with regard to the General Public, The SoCCs state only that: "**SPR will also consult the local communities, wider public and other organisations via rounds of newspaper notices and via publishing the documentation on its website. During this Phase, further Public Information Days will be held to communicate the findings of SPR's environmental assessment process and to communicate the proposed project details**". SPR made no formal commitment in the SoCC to listen to or take any account of feedback from the general public. As a result, local communities perceive the PID events as Information Days rather than consultation events.
- The SoCCs stated that Phase 4 "**will identify the potential impacts of East Anglia ONE North, including cumulative impacts as relevant, and where necessary will also identify possible measures to reduce, prevent or offset these. It will include information on the scope for any associated land restoration, landscaping and other mitigation measures if required.**" We do not believe the PEIR has delivered on this commitment

CUMULATIVE EFFECTS

- The PEIR is also deeply flawed because it fails to address the cumulative effect of four other major projects (all likely to be considered as NSIPs) in the same area and likely to be constructed in a similar timeframe. In relation to Sizewell C, the analysis of the cumulative effects is extremely limited and based on the out-of-date Phase 2 materials published by EDF. This is a particular issue in respect of road traffic, given that EDF has abandoned a 'Marine Led' strategy in favour of a 'Road Led' strategy.
- NGV's Nautilus and Eurolink projects (landfall, cable route and convertor stations) may well be constructed in almost identical areas onshore - see NGV presentation attached. The Greater Gabbard and Galloper expansions (landfall, cable route and substations) may well be constructed in similar areas given the existing onshore infrastructure at and between Sizewell and Leiston. The Scoping Response from SCC/SCDC requested that Nautilus interconnector be included in the CIA. SPR have excluded this project from their Visual Impact Assessment. This is unsatisfactory as both Nautilus and Eurolink are now in consultation and are public knowledge. The Expert Topic Group asked for Greater Gabbard and Galloper substations to also be included in the cumulative assessment. However, Table 29.14 shows that only Sizewell C has been considered for the CIA and then only at Tier 5, which does not relate to PINS Advice Note 17. SPR have chosen to use a hierarchy adopted by the Joint Nature Conservation Committee (JNCC) and Natural England in 2013, but no reason for this has been given. The criteria for JNCC and Natural England would have related to ecology and not to landscape and visual impact.
- In 2017 these five other projects were less certain but that is far from the case now. EDF is engaging in its Phase 3 consultation. NGV has already started consultation having presented its two proposals to the Suffolk Coasts & Heaths AONB Partnership in December 2018 and by holding ongoing meetings with Suffolk County Council and local residents. Likewise, the substantial expansion of the Greater Gabbard and Galloper windfarms were announced by the Crown Estate in October 2018. As PINS advice note 17 (Cumulative Effects Assessment) states "*the process is both iterative and ongoing and may need to be repeated a number of times during the preparation of the Development Consent Order (DCO) application and during the examination phase*". SPR by referring back to a Scoping Opinion in 2017 is clearly not following this advice. In this context it is also worth noting that the Crown Estate has announced "Round 4" which proposes further windfarms off the East Anglian coast, the expectation no doubt being that some of these will make landfall on the Suffolk coast with further substantial onshore infrastructure.

SEPARATION OF EA1N AND EA2 APPLICATIONS

- The proposal for EA1N and EA2 to be separately considered makes no sense. The projects are in the same place and cover identical issues. It will be extremely inefficient for all parties both in time and cost for these projects to be considered separately. In particular, it will make it even more expensive for local communities and relevant NGOs with their limited resources to have their say on these matters. This is a wholly unacceptable approach.

CHAPTER 2 - NEED FOR THE PROJECT

No one is doubting the need to invest in renewable energy and offshore windfarms. However, energy is not “renewable” if it includes permanent (and in this case unnecessary) damage to the landscape, the environment generally and to people’s lives. The reality is there is a headlong dash to develop offshore wind and to cash in on taxpayer subsidy. This has resulted in a complete absence of a long-term strategy for electricity distribution leading to short-term expediency.

Within the PEIR there is no analysis of:

- National Grid’s selection of a Sizewell/Leiston connection point
- Why the Bawdsey to Bramford cable route cannot be used as originally planned
- Why no alternative brownfield sites, e.g. Bradwell were considered

CHAPTER 3 – POLICY AND LEGISLATIVE CONTEXT

- Chapter 3, para 3.5 in Tables 3.1 lists relevant policies from Suffolk County Council's key plans and strategies and in Table 3.2 lists relevant Policies from the Suffolk Coastal District Council First Draft Local Plan (not yet adopted). The PEIR does not contain convincing evidence that onshore plans for EA1(N) and EA2 Substations and the Cable Corridor would comply with these Policies, in particular:
 - SCC Energy Infrastructure - Recommendation 15: *"New energy infrastructure must be sensitive to place. Relevant policies as well as national and local guidance, appropriate biological data and Suffolk's Landscape Character Assessment should be used to assess suitability of new energy infrastructures, and other developments, to particular places"*.
 - SCDC Strategic Policy SCLP10.3 - *"Landscape Character: Development should be informed by and sympathetic to Suffolk Coastal Landscape Character Assessment (2018) and Settlement Sensitivity Assessment (2018)..... Development Proposals are expected to where possible enhance the special qualities and features of the area, the visual relationship and environment around settlements and their landscape settings (also) visually sensitive skylines, seascapes, river views and significant views towards key landscapesDevelopment will not be permitted where it will have a significant adverse impact on rural river valleys coastal, estuary, heath land and other sensitive landscapes. Proposals should protect and enhance the tranquillity and dark skies across the District. Exterior lighting in development should protect and enhance the tranquillity and dark skies across the District. Exterior lighting in development should be sensitive to protecting the intrinsic darkness of rural and tranquil estuary, heath land and river valley landscape character"*.

CHAPTER 4 - SITE SELECTION AND ASSESSMENT OF ALTERNATIVES

- It is important to note that both EA2 and EA1(N) were originally to come ashore at Bawdsey, together with EA1 and EA3, and with a cable route to Bramford to the west of Ipswich, where the substations would be sited on an already industrialised landscape. The reasons why this location was dropped by SPR for EA2 and EA1N are at best confusing and appear to relate to short term commercial decisions taking precedence over environmental concerns.
- The decision to come ashore in the 'Leiston/Sizewell' area appears to have been dictated by National Grid with no democratic process or consultation with the planning authorities and with no recognition of the Heritage Coast and AONB status of the area.
- Initially, only sites to the east of the B1122 were chosen for assessment, of which the majority are in the AONB. SPR did not appear to have a problem with this at the time. On recommendation from SCC, SPR looked further west as far as Friston (7 zones in total). SPR then produced Red, Green, Amber (RAG) assessments of these 7 zones based on arbitrary criteria with no weighting given to their relative importance. In February 2018 there were amendments made to the criteria, which removed consideration of the total length of the cable route and the number of HGV movements that would arise as a consequence, as well as the number of properties requiring acquisition by CPO/private treaty. Following this update, 3 substation zones scored equally, i.e. Zone 4 (Aldringham), Zone 6 (Knodishall) and Zone 7 (Friston), with no explanation given for the subsequent omission of Zones 4 and 6. There are a number of inaccuracies in the RAG assessment such as the scoring of the B1122 as RED while Friston scores GREEN for highway access; properties being described as screened when they are not and no account taken of the risks arising from surface water flooding.
- SPR's own view now is that no exceptional circumstances exist for the siting of the substations within the AONB, when there are viable alternatives available elsewhere. This view is open to serious challenge and does not explain why SPR initially chose sites either in the AONB or very close to it. SPR clearly opined that development in the AONB was possible when Broom Covert was carried forward into Phase 3.5. SPR thus appears to choose policies to suit their own goals.
- A serious flaw in the consultation process has been for SPR to omit any detail regarding the proposed National Grid sub-station or how pylons are going to be realigned. Phase 4 Consultation has included a RAG assessment dated September 2017 but this has not been published before. It has not been clear before now that the NG substation was to be included in SPR's DCO application. However, Figure 4.5 (of Appendix 4.1 - page not numbered, but p60+ following the RAGs – the drawing is dated 3/12/2018) associated with the RAG shows the substation to be sited north of the pylons, although the RAG itself shows scores similar to the SPR substations to the south of the pylons. The situation regarding the NG substation has been queried with SPR in the past but no satisfactory explanation has ever been received.
- There is no cumulative assessment of the effects of all three substations on the environment, landscape or amenity of the area. SPR have identified that there is the potential for significant effects on Friston which require further assessment (Appendix 29.3) and this is yet to be undertaken. This is particularly unfair on the residents of Friston and shows total disregard for the loss of a valued amenity to the village. NG Ventures have now also included Friston in their site options, and this needs to be included at this stage when assessing cumulative impact.
- There is no explanation as to why a buffer zone of 250 metres from residential properties was adopted for this project. Typically, a zone of 500m+ is used and Royal Haskoning (SPR's consultant on environmental impacts), used 600m in their assessment of Greater Gabbard and Galloper substations at Sizewell. A buffer of just 250m is not acceptable. If 500m had been adopted then the proposed siting of the substations north of Friston would have been rejected. There is no acknowledgement by SPR that the siting of the substations will, in substance, extinguish a PRow footpath between Friston and Buxlow.

- The PEIR contains no detail on the exact route of the cable corridor. Even the width proposed is not clear. Para 177 refers to a typical width of 70metres, with a typical working width of 32m. SPR must make clear on how much land is to be disturbed. It is also important to recognise that NG Ventures Interconnectors would also require a similar cable corridor and this needs to be assessed within a cumulative impact assessment and should include the length of time before the area can be fully restored.
- The extent of woodland to be removed south of Aldringham Court is unclear.
- Within a few hundred metres of the proposed substation site there are a number of listed buildings. It appears from the PEIR that there has been no meaningful assessment of the landscape and other impacts on these properties.
- Timescale is a parameter that is wholly absent from the RAG assessment. SPR have outlined the planned duration of the project(s), and it is thus reasonable to ask to what extent have those timescales influenced the choice of site. Have timescale pressures precluded the consideration of any site that might involve compulsory purchase or formal consideration of AONB land? The impact of timescales on decision making has not been addressed within the PEIR.
- NPS-EN1 states that National Parks, the Broads and AONB have the highest status of protection in relation to landscape and scenic beauty. However, AONB designation does not necessarily preclude the siting of a substation within its boundary. The adverse effects arising at alternative locations on pristine farmland on the edge of a village may justify locating the sub-station in the AONB.
- SPR has not published any analysis of the ability to gain planning permission to build on an AONB that takes into account that it can be permissible if there are exceptional circumstances. Exceptional circumstances were the substations to be placed on agricultural land within the AONB would include:
 - the presence of existing and permitted large-scale energy infrastructure, nuclear and wind
 - the fact the site lies between such infrastructure and an industrial estate
 - the presence of an HGV route adjacent to the site
 - the fact that cables will come ashore in the AONB
- The precedents set by Greater Gabbard and Galloper Wind Farm substations, both recently installed on AONB at Sizewell appear to have been overlooked by SPR.
- The PEIR Chapter 4, Table 4.4) states that the cable route crossing point on Aldeburgh Road, Aldringham was decided at a Site Selection Meeting/ Visit on 20 September 2017. We understand the prime functional requirement at that time was for a route across the B1122 at least 50 metres wide that would avoid existing habitations and businesses and provide a path through to zones at Knodishall and Friston short-listed by SPR as potential substation sites. There is no evidence presented in the PEIR, (Appendix 04 Site Selection) that the Developer carried out a formal site assessment of this crossing point or that any alternative sites along the Aldeburgh Road were identified or considered
- There has been no assessment of impacts of this crossing point on Aldringham Court Grade II building, its wooded setting ("protected " by an Area Tree Preservation Order) and those residential properties on Fitches Lane and Aldeburgh Road whose curtilages are adjacent to the proposed crossing point.
- Aldringham-cum-Thorpe Parish Council and both Local Authorities have opposed this crossing point in their responses to subsequent Consultation Phases, in view of the devastating impact on landscape and the setting of Aldringham Court that would result from removal of so many trees. SPR would appear to have recognised that the route is not acceptable and the PEIR now proposes a reduced width cable route (16.1m for EA2 or 27.1m for both projects) at Aldeburgh Road crossing to be located immediately adjacent to residential properties on Aldeburgh Road and Fitches Lane. Since the minimum width requirement has now been reduced by one half, we ask SPR to conduct a formal site assessment of **all** the potential crossing points along Aldeburgh Road that could provide a 16.1/27.1 metres width cable run and a full assessment of impact on the adjacent properties and their settings including Aldringham Court and close-by residences on Aldeburgh Road, Fitches Lane and Gipsy Lane.

CHAPTER 6 – PROJECT DESCRIPTION

- Friston and Knodishall Parish Councils were not consulted on the 2017 Scoping Opinion.
- There is no explanation in the PEIR of why offshore platforms cannot be used for the substations – this is meant to be “offshore wind”
- Onshore cable route – given that SPR made changes to Bawdsey to Bramford cable route, with the result that route will currently only take just over half the originally planned capacity, the PEIR contains no analysis as to how such a situation would be avoided with this onshore cable route.
- Light pollution - the Planning Inspectorate response to the SPR Scoping Opinion registered concerns about the risk of unnecessary illumination in areas that currently enjoy darkness. Concerns about light pollution have been repeatedly made during consultation and at PIDs at Friston. These concerns have not been addressed. It can only be assumed that this is because light pollution cannot be mitigated.
- Light pollution – construction will be 7am to 7pm six days a week with even longer hours on occasions. Friston and a large proportion of the cable route are in rural areas, which are extremely dark outside of daylight hours. Further, during construction there will be 24-hour security lighting at the large construction compounds of which three or four are proposed at the substation location and a number along the cable route. Also, there is the possibility of 24 hour working which will require large scale flood lighting. All of this will cause massive light pollution for the six/seven-year construction period.
- Light pollution - operation - the security lighting proposed at all the three substation perimeters will cause significant light pollution. There are, and cannot be, measures to mitigate light pollution. In addition, there is further lighting for car parks which is stated to be movement sensitive. However, there is no recognition by SPR that local wildlife will trigger this lighting at random times during the hours of darkness.
- The site is not in substance low flood risk as residents of Friston know too well, some of whom have been flooded in the past at times of high rainfall. Again, this point has been repeatedly made. If it were a low flood risk, then why are two very large SuDS basins required, which in turn will permanently damage the landscape? There is no evidence supplied by SPR as to whether these basins will eliminate flood risk.
- How can siting a 30 acre facility next to a quiet village be regarded as avoiding areas of sensitivity as stated when:
 - a site next to two existing nuclear facilities has been discounted?
 - there is no justification of National Grid’s connection point at Sizewell/Leiston?
 - there is no rationale for not using the Bawdsey to Bramford cable route, currently under construction?
 - no analysis of brownfield locations?
- Car parking will be provided at the CCSs. At Friston, the resulting traffic may well come down the B1121 through Sternfield, where there is a single lane humpback bridge and residential properties immediately adjacent to the road. Generally, there is no attempt by SPR to address increased traffic on the B1121, a narrow and twisty road with blind bends and junctions, which is particularly constricted through Sternfield. Any increase in traffic on this road is highly undesirable. SPR should make it clear that no car parking by any element of construction related traffic will be tolerated at Friston.

- Substation access road is stated to be 8m in width. There is no justification as to why this road needs to be so wide since its use will be for operational access, when there will only be weekly/monthly inspection visits. Such a large highway in the middle of the countryside is completely unjustifiable. If a wide access is needed for ALLs (it is understood there will be only four), then such access should be temporary only.
- The construction period for each substation is stated to be 30 months. The construction period for the NG substation is 48 months. There is no explanation as to how these periods interact/overlap. The shortest period, assuming all construction is in parallel, is 4 years. If carried out in series, then the worst case scenario is 9 years, made up as follows: [30 months +30 months +48 months equals 108 months = 9 years]. Even this could extend if there were to be a gap before building the second substation without interim re-instatement.
- Whilst SPR do acknowledge the existence of a fire risk at electrical substations, the fire risk is considered as low because the populated areas are sufficiently distant. Nowhere is it acknowledged that fire/explosions are normally accompanied by the projection of material and toxic fumes. The 'Bill of Quantities' in Appendix 26.19 includes the provision of two concrete blast walls approximately 18 metres high. Explosion is not addressed and clearly needs to be, as it is not unknown for large high voltage transformers, static converters and shunt reactors to explode, resulting in fire, projection of debris and the release of toxic gases. A technical submission prepared by Atkins in support of the Rampion substation built in Sussex, indicates the need for a 120,000-litre holding tank for water if needed by the Fire Service. Where in the PEIR is SPR's safety assessment?

CHAPTER 7 - LAND USE

- In a world that needs to be fed, and given the UK's need for greater food security, any permanent loss of a significant amount of grade 2 agricultural land is to be avoided.
- SPR has made no serious attempt to properly assess the loss of agricultural land and has not even attempted to do so on a worse case basis, the purported basis for its analysis in other areas of the PEIR.
- SPR has only calculated permanent loss of agricultural land by the bare footprint of the substations themselves and the access road. This alone amounts to a loss of 13 hectares. To this should be added:
 - The areas which are to be used for screening
 - Other landscaping measures that prevent the cultivation of land
 - The areas of the SuDS basins
 - The area required for the new pylons
 - The area required by cable sealing ends
 - The areas that can no longer be effectively cultivated (agricultural machinery size etc) due to the fragmentation of the land caused by the substations and screening and landscaping.
 - The loss of land to reflect the losses at the margins of the roads, substations, screening etc.
 - The loss of land required to ensure drainage of an 8-metre-wide access road - there is no mention of this
 - The permanent loss of agricultural land along the cable route
 - Etc.
- On a worst-case basis, this could well amount to 20 hectares, which means the impact in terms of the loss of prime agricultural land is high.

CHAPTER 19 - AIR QUALITY

- The construction will result in stockpiled top soil and uncultivated areas of land at the substations construction site and along the length of the cable route. Given the nature of the top soil in this area it is very susceptible to wind entrainment as is commonly seen locally. For example in the recent high winds part of the B1121 to Friston was completely covered in topsoil/dust blown across from recently ploughed fields.
- Given concerns about increased traffic this will inevitably lead to greater air pollution. Further, the pollution and smell caused at the construction site by diesel powered heavy plant and machinery, HGVs and no doubt generators needs to be addressed. Depending on wind direction the village of Friston and properties near the construction site may well be subject to pollution (dust and particulates) and the smell of diesel fumes. The same will be true for all those communities along the cable route.

CHAPTER 20 – WATER RESOURCES FLOOD RISK

- SPR have failed to take account of the fact that Friston has an existing flood risk arising from heavy rainfall on Friston Moor.
- Friston Watercourse, which flows directly through the centre of the village, and areas adjacent to this watercourse, are in Flood Zone 3. The history of flooding in Friston was not been included PEIR No account has been taken of surface water flooding in any of the RAGs – they only consider fluvial flooding from main rivers and the sea) RAG assessment. This should be a major consideration in site selection.
- SPR propose to use the Friston Watercourse for the disposal of surface water from the three substation sites, contractors' compounds and ancillary areas. Parts of these sites are actually positioned on the Friston Watercourse itself, thus compounding the problem.
- EA1(N) is proposed to be built over an existing large pit, which currently takes the flow from a large existing underground field drain. SPR have failed to even mention this pit or drain in their assessment, nor the effect of their removal.
- SPR propose two Sustainable Drainage System basins (SuDs) to serve the three substations, however no analysis of the current situation has been made, nor any calculation supplied of the increased run-off or any details of how drainage would be managed. The Flood Risk Assessment merely refers to a drainage scheme being drawn up pre-construction. This is totally unacceptable in an area with an existing known flood risk.
- The SuDs basins are shown to connect into the Friston Watercourse close to the low point in Church Road, which already are prone to flood. This is not acknowledged in the Flood Risk Assessment (FRA), adding an unquantified risk to an already quantified and managed situation.
- The proposed substation sites are on high ground relative to the village. Flooding is already experienced in Grove Road following heavy rainfall as a consequence of run-off from the fields. These are above the level of the road, and often bringing large amounts of debris to the village. The substations are to be sited close to Grove Road at a high point and any run-off from this location will exacerbate flooding and run the risk of contamination in the village.
- SPR's stated objective is to establish whether *"the proposed project is likely to be affected by current or future flooding from any source and whether it will increase flood risk elsewhere"*. The FRA is totally inadequate in demonstrating solutions to this concern expressed by residents of Friston.
- Para 105 of the FRA states *"as such there is limited information on flood risk from the Friston Watercourse"*. This is most emphatically not the case, as Environment Agency maps and public records show. SPR merely identify some historical flooding along the B1121 (para 114) and grades it as low priority.
- Para 140 of the FRA refers to the final Surface Water & Drainage Plan with *"run-off limited where feasible"* and according to the following hierarchy: 1) into the ground 2) to a surface water body 3) to a surface water sewer or highway drain 4) to a combined sewer. SPR's intention is to discharge water into the ground or into the Friston Watercourse as a priority. This is a totally unacceptable risk to the village.
- Para 154 states that the controlled run-off rate will be equivalent to the greenfield run-off rate. SPR have not recognised the existing land drainage, including the large pit, which exists and is proposed to be removed.
- The risk of flood currently exists and would be made significantly worse during both construction and operation of the substations and associated works. SPR should be looking to reduce the existing flood risk to the village and not merely a half-hearted attempt at future mitigation.

- Due to its existing flood risk, the selection of the Friston site, should have been rejected before this Consultation commenced.
- In summary,– SPR’s plans to address flood risk are unconvincing given the reality of previous flooding of properties in Friston. SPR have carried out no assessment of the current form of drainage, nor provided any details of the increased run-off from the development of the substations or any details of how the SUDs system would be managed. The proposed SUDs would also cause further landscape damage and loss of

Flooding in Friston as result of heavy rain over Friston Moor



CHAPTERS 22 and 23 ONSHORE ECOLOGY and ORNITHOLOGY

Overview

It is recognised by local residents that stakeholders such as Natural England, RSPB, Suffolk Wildlife Trust, County and District Council will have a greater level of understanding of onshore ecology and ornithology, particularly in terms of survey methodologies, legislation and the data presented. The following addresses concerns as seen by local residents.

- The plans show mitigation is limited in its ability to “conserve and enhance biodiversity (NPS 5.3.4)”. There is limited discussion on how the land will be returned to its previous state in ecological terms. There are few opportunities identified for enhancement of the landscape. Creating ecological mitigation areas out of woodland that already exist is a ‘tick box’ exercise. What needs to be presented is strategically embedded mitigation that is both long term and beneficial to wildlife, and will improve the resilience to future change and enhance the areas surrounding designated sites.
- It is unclear from the following extracts as to whether the impact on the Sandlings SPA along the cable route would be minimised :

“The Applicant has committed to a reduced working width of 16.1m (reduced from 32m) within Sandlings SPA for a length up to 300m depending on the exact alignment chosen.” (Chpt 22: Table 22.5)

But also states:

“The typical 32m working width would be widened if a HDD technique is utilised to cross the Leiston – Aldeburgh SSSI and Sandlings SPA.” (chpt 6: 309)

It is unclear whether SPR is referring to just one or both developments, both EA1N and EA2.

- The HDD entry pits and transition bays for HDD technique cable laying would be located outside ecological designated sites to avoid any potential impacts. However along the cable route there are 36 jointing bays and 72 link boxes per EA1N and EA2. Although it is stated that there will be no above ground infrastructure, will they ever need to be accessed during the lifetime of the wind farm potentially disrupting habitat.
- Bats are frequently observed in and around Friston. The bat survey found only 15 features suitable for bat roosting along the entire cable route. All features were trees and none were buildings e.g. farm structures. Suitability for bat roosting adjacent to the proposed cable route has not been identified and some 25% of the data collected from the full static detector survey resulted in “no data”, “corrupt files” or “no access”. The PEIR is thus deficient in providing a full and detailed picture of bat populations.
- The PEIR indicates that appropriate replacement habitat will be provided for bat mitigation including creation, restoration or enhancement of habitats. There is no information presented to show how or when this will be carried out in order to be successful in maintaining bat populations pre-construction. There is little information on the proposed areas for mitigation, their suitability for roosting, foraging or commuting. The cable route will certainly fragment the network of hedgerows, and will disrupt the connectivity of identified populations. No information has been provided on who will monitor pre and post construction mitigation.
- 14 areas have been identified as providing optimal habitat for reptiles. However there are no plans to carry out specific reptile surveys (stakeholder agreement meeting April 2018). Mitigation has featured strongly in

other local energy developments, and this needs to be addressed pre-construction, given the nature of vulnerable habitats, including heathland.

- Loss of woodland is given a low magnitude of effect as SPR claim to be retaining similar habitats within the area (e.g. Aldringham). This suggests that the loss of woodland is not important and that by retaining similar habitats they have mitigated against this loss. Using a qualified arboriculturalist to assess woodland and hedgerows pre-construction is not mitigation. There is no reference to reinstating hedgerows or woodlands such that they become species rich. Enhancement of habitats is needed to fulfil mitigation, not just like for like replacement.
- In terms of onshore ecology, areas of arable land seem to be considered to be of low importance. This takes no account of farmland bird species, many of which are on the UK Red List.
- It is stated that coastal habitats will not be directly or indirectly affected by construction and therefore there will be no change to these habitats. HDD being used at the coast will affect the habitat through noise vibration and 24 hour lighting. In particular, vibrations on the sandy cliff could affect populations of species using this important protected habitat.
- There is no mention of the impact into common species of animals and plants that rely on the habitat networks at the landfall site, along the cable route and at the proposed substation site. Although Schedule 1 Target species of birds and Red List bird species are mentioned in the ornithology methodology, there is no information on the more common species that live in these habitats.
- There are seven active badger setts recorded in the onshore development area. Closing the setts by destroying them is offered as mitigation, as is avoiding the setts when defining the cable route.
- Three ponds containing great crested newts, with the possibility of two more have been identified . Mitigation offered includes pre-construction surveys, cable route refinement and translocation.
- Mitigation suggested lacks any detail to enhance the landscape. Mitigation should go further than net-loss, enhancement and improvements to the landscape should be embedded into the report.
- Future loss of species through changes in climate are predicted to occur over the next 25 years. It is suggested that “...it is likely that without the proposed East Anglia TWO project, most target species currently found within the indicative onshore development area would decline in numbers over the long-term, should climate changes occur as predicted” (vide Chapter 23, par. 110/111), implying that these wind farms will contribute to the reduction in emissions on such a scale as to prevent the indirect loss of habitats. This is a bold statement and unsupported by any data within the PEIR. It would be useful to have quantifiable data to back this statement up. Comparing the emissions to build the wind farms (wind turbine production and siting, cable route and substations, concrete production, vehicle emissions, maintenance and possible decommissioning) with the reduction in emissions from energy produced by the wind turbines will be more indicative of whether habitat loss will be reduced.
- The impacts for the proposals for both wind farms either sequentially or simultaneously are rated as of **negligible significance** or **minor adverse significance** on the impact to onshore ecology. With only **moderate significance** identified for bats and great crested newts.
- The loss of woodland and trees is doubled for two wind farm proposals but saying the trees and woodland would not be lost twice shows the insignificance placed on these habitats. The scale of the mitigation is

poor and the damage to one particular woodland at Aldringham is locally significant. Trees cannot be replanted over the cable route so habitat networks are fragmented particularly for species that rely on continuous mature woodlands and hedgerows.

- Arable land and grassland are given **negligible significance** impact on the ecology of these habitats. There is a lack of information regarding farmland birds and the impact of these proposals. Sequential developments would affect twice the area but importantly over a longer period, therefore adversely affecting recovery time.
- The disturbances to the habitats and species within them would be affected significantly if developments were carried out sequentially as recovery time would be impaired. Large scale construction consolidation sites would be needed twice. Construction traffic, noise and light pollution would be for a far longer time span. Fragmentation of habitats will occur over a longer period.
- Suffolk Biodiversity Information Service shows many farmland bird species present within the cable route and substation area. The Red List birds of conservation concern include those species that have been identified. Has the methodology adequately covered the cable route and substation development area? The Appendix for Onshore Ornithology is confidential and not available to the general public.
- SPR justify much of the methodology by using the phrase: *“All ecological field surveys have been undertaken in accordance with industry accepted guidance and within their optimal surveying windows”*. Specialist stakeholders such as Natural England, RSPB, Suffolk Wildlife Trust should be given the opportunity to assess these data given their expertise in each field.

CHAPTER 24 – ARCHAEOLOGY AND CULTURAL HERITAGE

- Friston's origins are in Saxon times and there are a large number of Heritage Assets from many periods in SPR's study area. These include FRS 013 Friston Moor (a medieval common in usage for several hundred years) and KND 009 Buxlow Church (immediately adjacent to the substation site) around which human remains are expected to be found.
- It is highly likely that further considerable archaeological features are likely to exist within the sites identified for the three substations. The building of an 8M access road also compromises the rural setting of historic Friston Moor.
- Contrary to advice in the Scoping Report that trial-trenching for archaeology should be carried out prior to a DCO application being made, SPR have declined to do this until after consent is given. This is totally unacceptable and puts our heritage at risk.
- There is an ancient track (FP6) which connects the village to Friston Moor and follows historic field boundaries. This PRoW will be extinguished by the building of the substations. This same track formed the boundary between Friston and Knodishall and its extinguishment will be a loss of a historic boundary feature.
- There are 5 Listed Buildings within the study area of the substation site. These are the Parish Church of St Mary (Grade II*), High House Farm, Little Moor Farm, Woodside Farm and Friston House (all Grade II). All require further assessment by SPR urgently.
- The Church is a prominent feature in the landscape, which SPR acknowledge but can offer no mitigation to the detrimental effects the substations will have of views of the Church from all directions. Neither has any consideration been given to the effects of noise and vibration on the fabric or usage of the Church, either during construction or operation. This is unacceptable and a full assessment is necessary.
- Little Moor Farm, Woodside Farm and High House Farm are historic farmhouses and their agricultural setting adds to their significance. No analysis has been carried out by SPR on the harm to the settings of these buildings nor has any mitigation been considered. Tree planting may not be the answer in this situation.
- Church Walls Cottages (adjacent to the Church and Listed Grade II) has been omitted by SPR in its assessment. Also omitted is Friston Mill (Grade II*) which is a prominent feature in the landscape and whose setting will be compromised by the building of the substations.
- The 9km cable route is rich in archaeology, particularly in the region of the Hundred River.
- The cable route will also result in the loss of an area of woodland in the vicinity of Aldringham Court, affecting the setting of this significant Grade II property. The landscaping was integral to the original plan by architect, Cecil Lay, who designed the house, known as Raidsend, for himself. Cecil Lay was an important architect both locally and nationally.
- The landfall at Thorpeness is an area with a substantial heritage of World War I and II remains.
- Once again SPR have pushed difficult issues to one side on the basis that they will deal with these once Consent is given. Had these matters been properly considered when launching the project, then the landfall, cable route and substations site would have failed to meet the criteria for development in this location.

CHAPTER 25 – NOISE AND VIBRATION

Overview

- In Paragraphs 25.3.2 *et seq*, the worst-case scenario as perceived by SPR, is the construction of one substation, when in reality, the worst-case scenario for local residents as regards noise impact, is the construction and operation of three substations, namely EA1(N), EA2 & the NG Grid substation.

Noise During Construction

- Regarding EA1(N), Table 25.37 addresses just three aspects of the cumulative impact of increased noise and vibration associated with EA2 construction and concludes that the residual impact significance is either “negligible” or “minor”. Chapter 25 thus fails to address adequately, the concerns expressed by residents at all PIDs regarding the likely impact of noise on their lives from a construction programme which may last 7 or more years.
- SPR appear to have concluded that 65 dB(A) is an acceptable limit for daytime construction noise, and fail to appreciate that this is the generally accepted point at which continuous background noise transitions from ‘acceptable’ to ‘annoying’.
- In choosing a noise threshold of 65 dB(A) and 55 dB(A) at weekend, SPR have sought to convince residents that the impact at 35 selected sites bordering the construction corridor is either “negligible” or “minor”. This demonstrates a woeful lack of understanding of the nature of sound propagation in the real world.
- SPR have failed to disclose that when the cable route crosses the Hundred River, the use of diesel engine powered pumps running on a 24 hour basis may be necessary to avoid flooding. The noise generated by such pumping arrangements is very difficult to suppress.
- SPR fails to understand that a 7:00 am to 7:00 pm working day lasting for several years will adversely affect sleep patterns of many residents living in close proximity to the construction sites,
- Site mitigation measures as proposed in Table 25.4 are minimal, and of questionable efficacy.
- National Planning Statements require SPR to identify and characterise distinctive low frequency, impulsive and tonal content of potential noise sources. Regarding construction equipment there is no mention by SPR or quantification of “track patter” associated with bulldozers or of vehicle reversing alarms, both of which markedly increase the noise footprint.
- Completely absent from the PEIR, were maps showing the predicted noise levels as dB (A) contours.

Noise During Operation

- To be consistent with National Planning Policy Framework (2018), SPR are required to identify **and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason**. Within the PEIR there is no evidence that SPR understands its obligations in this area, particularly with respect the siting of the substations.
- SPR appear to have taken a unilateral decision to work to a 35 dB L_A equivalent (*vide* Table 25.4) as the limiting continuous noise level to be experienced at nearby properties, despite having given repeated assurances at all PIDs that this noise level would not exceed 30 dB(A). Night time noise level in the area surrounding the proposed substation(s) rarely exceeds 30 dB (A) and from midnight to 4:00 am is generally less than 27 dB (A), typically 24 dB(A)
- The adoption of a 35 dB L_{Aeq} to be applied at two substations simultaneously represents a serious attempt by SPR to gain acceptance of increased noise levels by “parameter creep”. An additional substation of identical build will result in twice the noise output power (ie +3 dB) and a doubling of the apparent size of the source. This will inevitably increase the noise footprint, but SPR continue to claim the effect will again be “negligible”! An additional concern is that a dB(A) L_{eq} approach allows periods of increased loudness to be ‘offset’ by quieter periods. This approach, whilst valid in assessing traffic noise and worker short-term exposure to the effects of impulsive noise, its application in the context of continuous low-level noise is questionable. SPR do not seem to appreciate that a constant low level hum, such as that originating from HVAC transformers and fan cooling arrangements is highly disturbing at night, particularly for light sleepers. For those who normally sleep with the window open for health reasons, there is no attenuation of noise at a first floor bedroom. This attenuation is normally taken as 15dB with a window closed.

- To comply with best practice, there is an underlying requirement for SPR to take extra measures to suppress noise where this contains strong tonal qualities (eg 50 Hz and its harmonics) or impulsive components. There is no evidence presented that SPR will abide with best practice.
- As with the onshore construction corridor, SPR have failed to publish maps showing predicted noise contours, which is a norm for this type of project. SPR should have published a substation layout, populated by all noise emitters which would have allowed their predictions of “negligible” impact significance to be verified independently.
- Overall, Chapter 25 shows a complete lack of understanding of the physics noise propagation in the real world. Nowhere is there any reference to temperature inversion, which occurs late afternoon/early evening, and in frosty conditions. This inversion increases the noise footprint as a consequence of atmospheric refraction, such that residents of Friston and the surrounding area will experience greatly increased sound power levels at night.
- Mitigation of high amplitude low frequency noise propagation is exceedingly difficult. Measures suggested by SPR, such as earth bunds, fences and screens are relatively ineffectual, as a consequence of sound wave diffraction. The only practical solution is sound suppression at source or increased separation between emitter and receptor.
- A number of the acoustic monitoring sites were poorly chosen and distort the overall assessment of background noise particularly at night: examples being: SSR10 and SSR11, which are close to large agricultural buildings used for drying potatoes and employ ventilator fans: SSR1 and SSR7, which are both adjacent to a road junction and CCR9 which is shown as being in Gypsy Lane, but in fact was adjacent to the Aldeburgh Road.
- This latter point was raised formally with SPR who confirmed in writing that some readings for CCR9 were not taken at the coordinates stated in the PEIR. These were undertaken by a noise surveyor working directly for Royal Haskoning DVH who carried out 1 daytime and 2 night time measurements at this location. The first night the lane was accessed, without realising it was a private road. The surveyor later talked this over with the. The following night he stayed off the private lane and therefore the location was closer to the main road and away from the properties
- Within the Appendix for Chapter 25 it is evident that several of the detailed noise level recordings for SSR receptors are erroneous: in particular, the LAeq level for SSR5 is shown as typically 20 dB above the prevailing LA90 level for a 7-day recording period. This is contrary to expectation. It conveys to local residents the view that SPR or its consultants lack competency in acoustics.

Light Pollution, Safety & Security

Light Pollution

- Guidance issued within the UK Government National Planning Policy Framework states clearly, that light pollution *....” can be a source of annoyance to people, harmful to wildlife, undermine enjoyment of the countryside or detract from enjoyment of the night sky.”...* Chapter 25 of the PEIR reiterates this statement, but nowhere is there an explicit statement that SPR intends to adhere to this guidance.
- Friston and much of the surrounding area enjoys a ‘dark skies’ environment, and it is the absence of light pollution that attracts many of the visitors to this area. Activities by SPR in pursuit of EA1(N) and EA2 have the potential to destroy totally this treasured asset.
- At PIDs, SPR have stated that the EA1(N) and EA2 substations sites will be unmanned, but will have permanent security lighting triggered by passive IR detection equipment. No assurances are contained within the PEIR regarding false alarm rates or likely frequency of manual intervention. There is suggestion within the text that routine maintenance of the substations, that will be weekly. Is this for one, two or three substations?
- Examination of the EA 1 construction site at Bramford and associated haul road from Bawdsey to Bramford, shows presence of numerous diesel generator powered lighting sets. SPR have indicated weekday working from 7:00 am to 7:00 pm and 24 hr working at the landfall site. For 6 months of the year this will only be possible with the aid of artificial light. It is noted that within the list of plant needed to construct the cable route, there are references to Diesel generator lighting sets, but nowhere is there an explanation of where and when such equipment will be deployed.
- SPR needs to recognise that the use of artificial light to mitigate concerns regarding safety and security, merely transfers the unwanted environmental burden to local residences and will be vigorously opposed on the ground of environmental pollution.

CHAPTER 26 – TRAFFIC AND TRANSPORT

Overview

- There will be an unacceptable increase in traffic on the network of rural roads, including HGVs and vehicles used by construction personnel. There is no information on Light Goods Vehicles or into which category they fall.
- There is insufficient information or assessment of the cumulative effect of traffic with Sizewell C (SZC) and other proposed energy projects including the Interconnectors (Nautilus and Eurolink) and extensions of the Greater Gabbard and Galloper Windfarms.
- EDF have indicated that 85% of SZC's HGVs will travel up the A12 from a southerly direction. SPR have failed to address from which direction their HGVs arrive. It is important to establish this matter before DCO submission.
- No account has been taken of seasonality of traffic flow. East Suffolk is a highly popular tourist venue, with many events taking place between Easter and September, both mid-week and weekend. Typical events are Folk East, Latitude Festival, Aldeburgh Festival, Aldeburgh Carnival, numerous concerts at Snape Maltings throughout the year, plus many others. With limited availability of public transport there is always a significant rise in local road traffic leading to tail-backs on the A12. Further, SPR proposes Saturday working when summer holiday traffic is at its peak. There is no assessment of the serious congestion which will inevitably result.
- There is also a periodic increase in traffic due to pre-planned outages at Sizewell B reflecting the temporary employment of several hundred additional workers. Again there is no acknowledgement or assessment of the impact.
- The junction of the A12 and A1094 is an accident blackspot. SPR's proposals to reduce the speed limit and introduce rumble strips and signage is totally insufficient to mitigate the danger, especially given the number of vehicles proposed to turn at this junction. An obvious effect will be increased congestion and increased risk of collisions.
- The A1094 is a winding narrow road, with tall hedges directly bordering the roadside in places and at least two bridges. The road is much used by slow moving farm vehicles, many with trailers taking produce to nearby packing stations. SPR have stated that in their opinion two HGVs should be able to pass each other readily and that this approach forms the basis of their traffic plan. There are stretches of the A1094 where it will be very difficult, if not impossible, for two HGVs to pass safely (especially those designed to carry aggregates etc), without causing damage to verges and hedges. Currently the road is hazardous even for a car and HGV to pass easily without a significant reduction in speed. No mitigation has been offered by SPR.
- SPR propose a 71% increase in HGVs on the A1094 and an increase of 135% on the B1069 (Appendix 26.25). Even SPR acknowledge the effects of this to be **major adverse**. This is without the cumulative effect of SZC, whose Phase 3 consultation estimates 250 vehicle movements per day along the A1094. No mitigation has been offered by SPR for the substantial increase in traffic on the B1069.
- SPR state at Table 26.4 of Chapter 26 that *"no HGV traffic would be permitted to travel via alternative routes, such as the B1121 (through Friston)*. However, from the last entry on Appendix 26.12 under **HGV Traffic Distribution**, it can be seen that it is intended that there are **45** HGV deliveries per day proposed to use the B1121 to access the National Grid Substation. There is also a total projected number of 99 vehicles per day using the B1121, and given the projected workforce of 19 employees on the NG substation, one can only conclude the 99 vehicles will include a high number of LGVs or similar.
- Why is this new permanent access road proposed to be 8m wide when its stated purpose is for weekly/monthly maintenance post construction? .
- The PEIR does not show how SPR intends to monitor HGVs, LGVs and private cars using the road network or prevent construction workers from parking cars in any available spot in the local countryside. Most of the roads around Friston are country lanes and there are also issues with unsuitable vehicles using these roads. There is no indication of how SPR intend to prevent site access from the public road network where the haul road crosses

Grove Road. This 'cavalier' use of access has been a considerable problem on other similar SPR projects, EA1 being an example. The PEIR contains no traffic management plans.

- The junction of the A1094 and the B1122 at the roundabout in Aldeburgh is clearly unsuitable for HGVs to turn left. Residents of properties in this area have no onsite parking and rely upon on-street parking. This in effect results in a near permanent single lane situation.
- There is no assessment of the risk of emergency vehicles being seriously delayed on the A12 or on A1094. There have been issues in the past when ambulances and fire engines have been seriously delayed in reaching Aldeburgh. Aldeburgh has a significant elderly population which exacerbates this issue.
- The convoy system proposed for the B1353 road will adversely affect the village of Thorpeness as only other access route is via the coast road from Aldeburgh, which in turn will experience increased traffic flow at the roundabout. (Grid Ref. TM 45850, 57050)
- Cumulative impact (traffic) Construction of EDF's Sizewell C nuclear power stations is due to occur in same time frame as EA1(N) and/or EA2, but forecasts of Sizewell C generated HGV and employee traffic have not been included in Table 26.22 *Existing and Proposed Daily Traffic Flows*.
- Regarding traffic directed along the Cable Corridor / Haul Road, Chapter 6.7.3.11 Temporary Works: Construction Consolidation Sites, para 371 states "**Construction traffic is proposed to be routed to the CCSs, and thereafter the majority of construction traffic would be carried along temporary access roads, onshore cable route haul road and onshore cable route and substation construction access haul road.**" From this, it would appear that the intent is to direct as much construction traffic as possible along the haul roads, rather than along public roads. That strategy could well prove unacceptable to residents living close to the Haul Roads as a consequence of noise, dust, vehicle exhaust pollution and artificial light pollution needed to conduct 12-hour working. Further, the PEIR does not provide Daily Traffic Flows (HGV and Employees) along the main Friston to Thorpeness Haul Road.
- There is considerable concern among local residents that other minor roads such as Mill Lane could become "rat runs" for construction workers, deliveries to the substations and local trades people seeking to avoid traffic hold ups.

Concerns Regarding Heavy Goods Vehicles (HGVs)

- **Existing Annual Average Daily Traffic Flows.** The ATC data published in the PEIR is misleading to the general public. On some of the quiet rural roads along which SPR intends to direct its HGV Construction traffic, vehicles whose Gross Weight is in excess of 7.5 tonnes such as 4-axle tipper trucks are at present a rarity. The ATC reports include DFT Class 5, type 2 R4 vehicles as HGV traffic. It is accepted by DfT that Class 5 counts are notoriously inaccurate. Most vehicles counted in Class 5 are small Transit type delivery vans and small lorries (2-axle) under 7.5 tonnes gross weight. In contrast HGV traffic associated with EA 1(N), EA2 NG substations and the landfall site are expected to comprise typically Class 7, ie 35 tonne flatbed 4-axle type carrying sand and aggregates etc.
- The forecast increases in HGV volumes presented in the PEIR are therefore highly misleading. For example: B1122 Aldeburgh to B1353 section. At count point 5, SPR counted 139 HGVs AADT, of which 100 were counted as type R2/ Class 5. In reality, these would have comprised in the main local delivery vans, and not HGV's as the general public understands the term. The survey counted only 39 vehicles in classes 6-11, of which 23 were buses. The PEIR forecasts that the projects will generate an additional total AADT of 100, of which 45 would be HGVs and proposes that HGV traffic would increase by only 30%. By our calculations, movements of classes 6-10 (Bigger Heavy Lorries over 7.5 tonnes), would lead to an increase of 281% in heavy lorry traffic, that is 45 additional heavy trucks per day, in addition to the present AADT of 16 in classes 6-10. Therefore, although the PEIR forecasts that HGV traffic would increase by 30%, the public's actual experience will be very much greater.

CHAPTER 27 – HUMAN HEALTH

- Residents of Friston are already suffering impacts to their wellbeing as a consequence of SPR's proposals to blight the surrounding landscape, and face a possible 8 to 10 years of noise and disruption to their lives. And then all the impacts post construction. In the case of many, this represents the remainder of their lives. SPR appear to be indifferent to this very human impact on the lives of residents in this area.
- SPR clearly regard such concerns to be "perceived" rather than "actual", when they are not in a position to judge this. The residents of Friston and surrounding communities are not ambivalent to the construction of these substations as shown by attendance at the Phase 4 and preceding PIDs. It is slipshod of SPR to categorise concerns as merely "perceived".
- Demographics drawn upon by SPR appear to be largely historic, national or regional, and not local to this area.
- Care homes identified along the proposed cable route have fewer elderly or vulnerable residents than live in Friston: Of the 117 persons aged 65 and over, at least 25 live within 500m of the proposed substation(s). Similar ratios may be expected between Friston and the landfall site.
- A lack of mobility in the housing market is now apparent and this has increased mental pressure on spouses, carers and relatives seeking to support elderly or infirm residents living in this area.
- Equity in owner-occupied homes has already been adversely affected by the announcement of the project, which has blighted future financial planning, particularly in respect of future care needs
- The ongoing uncertainty surrounding the substation development as resulted in a decrease in the sense of well-being and an increase in anxiety and mental distress of those living in communities close to the substation site(s), within the landfall area and the cable route.
- In its approach to Human Factors, SPR frequently use descriptors such as "Short Term". Terms like these must be defined numerically and in relation to the overall project time scale.
- The 10km of cable route and more than 35 acres of onshore Sub Station cannot just be considered as a "Localised Area"
- SPR has sought to classify the impact of increased noise/light/water /air pollution on the resident population as being "**negligible**" or of "**no significant magnitude**" i.e. very small. Given the size of this project, such classifications become quite meaningless, and the impact of this project upon the human well-being cannot be treated as "**minimal**" or "**negligible**".
- SPR propose closures and diversions that will deny ready access to footpaths, bridleways and cycle routes which are used extensively by local ramblers, residents, visitors and youth organisations. Groups of young persons undertaking hikes for their Duke of Edinburgh Awards, who frequently set off from Friston to follow the Sandlings path toward Dunwich. SPR must clarify terms such as "short duration closure" in relation to PRoWs.
- Restricting easy access to the network of footpaths across the whole construction site will impact adversely levels of physical activity of residents, resulting in increased use of the road network and reduced health benefits.

Cumulative Impact

- SPR must take into account the number of proposed projects in such a small area when considering the impacts on human health

- There is a distinct risk that communities such as Friston and Aldringham can be split in half as a consequence of the potential danger that arises from increased traffic flow

Safety & Security

- Despite its size, the PEIR makes no reference to the safety and security of residents during the construction and operation of the substations.
- SPR have indicated that construction programme will require approximately 330 persons, most arriving by personal transport. Given a minimum 8 hour working day over a period of 4-8 years, this equates to several million man-hours exposure to the risk of accidental injury. A rise in the number of industrial injuries requiring hospital treatment is therefore to be expected, increasing the load on an already overstretched health service and rural ambulance service. This constitutes an adverse impact on the local population, which SPR appears to have been totally ignored within the PEIR. No consideration appears to have been given to the risk of additional difficulties caused by road blockages and traffic lights at haul road crossings.

CHAPTER 29 – LANDSCAPE AND VISUAL IMPACT

- Throughout all the consultations, there has been no satisfactory explanation from SPR as to why they have chosen a site so close to a village
- In its response to the Phase 3 consultation SASES commissioned an independent landscape report from Michelle Bolger Associates. Whilst that report was prepared for the purpose of a comparison between the Friston site and the Sizewell Broom Covert site (it was supplied to SPR as part of the Phase 3 consultation) by definition, it includes an appraisal of the Friston site, and that appraisal forms part of this response.
- SPR refers to a 250 metres standard distance when assessing the proximity of residences that will be impacted by the onshore installations. This is not consistent with industry practice, which typically uses a minimum of 500m radius as the standard. Indeed Royal Haskoning DHV itself applied a 500 metres radius for the Galloper Substation at Sizewell (much smaller substation and further away from homes). Research of other wind farm projects has not identified other projects that have adopted a standard distance under 500 metres. SPR itself adopted as a standard a 600m radius minimum distance from any residential property at the proposed Bramford substation complex to be connected to EA1 and EA3. Woodside Cottages in Grove Road, Friston are only 200m or less away from the substations, and are only 100m or less from the nearest CCS. This issue has been raised and ignored in previous consultations.
- There are 13 viewpoints, which have been agreed with the Expert Topic Group. None of these are taken from the upper part of Grove Road, where the substations are closest to the road and will be seen by motorists, cyclists, horse riders and walkers at very close range with no effective screening, other than a proposed new hedge. Currently the field has no boundary features whatsoever, and the site would be totally open to view during construction and many years thereafter. There appear to be additional viewpoints, which were requested by the Council but have not been included at Phase 4. Page 6 of main Landscape Chapter, final entry SCC/SCDC of 17/7/2018 asked for 5 further viewpoints to be considered in addition to those submitted by SPR. SPR have not provided these in Phase 4, claiming that it was not possible to obtain winter photos. (This is regarded as a poor excuse).
- The Indicative Landscape Mitigation Plan presented in Phase 4 differs considerably from that shown on the Indicative Masterplan of Phase 3.5. There is considerably less tree planting proposed and where planting is shown, it appears to relate directly to the chosen viewpoints in order to show these in a good light, e.g. Viewpoint 1 from Grove Road, where a block of tree planting stops the view, but only from one specific point. There is very little tree planting shown on the Mitigation Plan to the north of the substations, yet this is not reflected in the visuals where a veritable forest is shown.
- Much is made of the screening offered by Grove Wood and Laurel Covert, “substantial” is the word used. In fact, these woods only assist with long distance views from the east and have no bearing on the impact on Friston or the listed buildings which ring the site. A part of Laurel Covert is proposed to be removed to accommodate the substations and the contractors’ compounds. This is unacceptable approach, especially since SPR offers Laurel Covert as the only Habitat Mitigation Area.
- There is no screening of the view from Woodside Cottages in Grove Road, nor is there any reference to this property in the report at all. Woodside Cottages are less than 200m from EA2 and should receive a full appraisal by SPR of the likely impacts upon the residents. The effect on these relatively isolated cottages must be wholly unacceptable.
- Nearly all landscape and visual mitigation depends on screening by tree planting, yet no evidence is given to support the assertion of trees being mature in 15 years, nor does it state when this 15-year period starts. Taking the worst case of a seven-year construction period starting in 2024 construction will not be finished until 2031. Add on 15 years (assuming tree planting will be mature by then) there will not be effective screening until the mid-2040s, over 20 years from the beginning of construction.

- No visualisations have been prepared after 5 years and 10 years in addition to 15 years, therefore, the impact over the years cannot be assessed.
- The 15-year maturity period for effective screening is incorrect. Paragraph 29 estimates the height of the planting areas after 15 years as (i) Core woodland 6m – 10m (ii) Screening woodland 6m – 12m (iii) Edge woodland 2m – 5m. From these predictions it is hard to see how even the tallest tree would screen buildings and structures which may be 15 - 18m high.
- Table 6.26 and paragraph 401 in Chapter 6 further confuses the situation and shows the myth of effective screening by tree planting over 15 years. In this chapter tree growth is assumed by SPR to be 300mm a year, yet the buildings are 15m high (16 m high in the case of the National Grid substation) and the highest structures are 18 metre high. If you assume the trees being planted are 2m high at the time of planting (no information is provided on this) it will take 43 years to screen the 15m high buildings, 46 years to screen the 16m high buildings and 53 years to screen the highest structures. This is longer than the lifespan of the project. Therefore, there can be no effective screening despite the unsupported assertions to the contrary in the PEIR.
- There is very little tree planting shown on the Mitigation Plan to the north of the substations, yet this is not reflected in the visuals where a veritable forest is shown. The viewpoint taken from the Aldeburgh Road however does demonstrate that no amount of planting will mitigate the view of the substations from this elevated position, despite being some considerable distance away.
- SPR admit that the construction of the substation will result in changes to the ground profile within and around the substations as the ground will need to be levelled. This does not appear to be reflected in the visuals.
- The existing Footpath 6 has been removed completely from the Landscape Plan and is replaced by a yellow broken line extending under the pylons immediately adjacent to the NG substation. This will be a hostile environment for walkers who currently enjoy tranquil and beautiful views from the existing path.
- On page 27 para 5.9.19, EA1 and EA3 are cited as examples of onshore infrastructure, which may have comparable landscape and visual impacts. EA1 and EA3 sites cannot be comparable, as Bramford is an already industrialised landscape with existing substations and electrical infrastructure, with residential dwellings and settlements much further away.
- Appendix 29.1 identifies the substation site as Ancient Estate Claylands LCT and that there are **significant** effects on this LCT, which require further assessment. The PEIR goes on in Appendix 29.3, Tables 29.1 to 29.7 and 29.10 to conclude that there will be **significant** effects on landscape character within 1km of the substation and significant visual effects on residents of parts of Friston, people walking on the public rights of way, residents of scattered rural dwellings and also motorists/cyclists travelling on Grove Road and the B1121. The magnitude of change is assessed as **medium high**. This is clearly unacceptable, and the proposed landscaping cannot mitigate this in either the short or long term.
- With regard to the cable route, there will be significant long-term effects on the landscape due to the permanent loss of woodland to the south of Aldringham Court. It is not proposed to replant in this area due to access being required to the underground cables. This will substantially change views experienced by local residents and those using the B1122.
- The technical jargon and methodology used in this report presents a veneer of objectivity, but the errors, omissions and language used in this chapter show this is little more than a sales document. This chapter and appendix would carry far more weight and had it been commissioned on an Independent and objective basis, when readers could be confident that impacts were not being “spun” to minimise the landscape and visual impact of these proposals. The confusion over tree planting shows the lack of expertise and rigour in the preparation of the PEIR and LVIA.

- As commented on earlier, the SPR frequently use the word ‘temporary’ in many areas to give a false sense of the impact. For example, using ‘temporary’ next to ‘medium term’ confuses. Using “temporary” in the context of a 15-year period is absurd. Further, using “temporary” to describe the impact when instead of seeing typical undulating East Anglian countryside you will be confronted by a wall of conifers. To describe construction as ‘short term’ and ‘temporary’ when it could be 7 plus plus is equally misleading.
- It is stated that “*onshore infrastructure has been designed carefully*”. If so, can detailed designs of the SPR substations and the National Grid substations be made available? SPR have previously stated that no such detailed design has in fact been carried out and that designs for previous projects have been used to give a sense of impact. Which is it?
- Other than the views from the cycle route on Grove Road, there is no reference to the visual impact on cyclists, only motorists. Friston and the surrounding area is popular with cyclists and all roads around Friston are used by cyclists. Accordingly, the LVIA needs to address this. Further it needs to be acknowledged that cyclists move more slowly and therefore by definition the visual impact on them will last longer.
- There is no acknowledgement that the footpaths surrounding the village are well used and the adverse visual impacts will be very high. Even on SPR’s own calculations mitigation will not be fully effective for over 20 years after the start of construction. Even after 20 plus years there is a very great difference between walking in open undulating countryside (for which East Suffolk is known) as opposed to walking next to commercially planted trees populated with conifers.
- Any visibility of industrial infrastructure in what is acknowledged to be a rural landscape is detrimental. The LVIA acknowledges that even with mitigation the substations will always be visible on all approach roads to Friston. As such, residents will always have visibility of industrial infrastructure when they return home as will visitors. This will significantly reduce the attractiveness of the village to new residents.
- The reports attempt to divide the village into different areas, failing to acknowledge that residents do not simply stay in their homes. For example, the village green is a focal point for many events and the industrial infrastructure will be visible for over 20 years even assuming the screening will be effective after 15 years post construction, which is a highly dubious assumption given the comments above.
- The Scoping Response from SCC/SCDC requested that Nautilus interconnector be included in the Cumulative Impact Assessment (CIA). SPR have excluded this project from their Visual Impact Assessment. This is unsatisfactory as both Nautilus and Eurolink are being consulted upon and are public knowledge.
- The Expert Topic Group asked for Greater Gabbard and Galloper substations to also be included in the cumulative assessment. However, Table 29.14 shows that only Sizewell C has been considered for the CIA and then only at Tier 5, which does not relate to PINS Advice Note 17. SPR have chosen to use a hierarchy adopted by JNCC and Natural England in 2013, but no reason for this has been given. The criteria for JNCC and Natural England would have related to ecology and not to landscape and visual impact. The use of another hierarchy serves only to confuse the situation and attempt to downgrade the cumulative impact of SZC.
- SPR intend to construct an 8m wide access road from the B1122, which will create a very prominent urban feature in a rural setting. No coherent explanation has been given as to why this width is required given that its stated use is only for operational substation maintenance.

CHAPTER 30 – TOURISM, RECREATION AND SOCIO-ECONOMIC

- There is no clear logic as to SPR's assessment of impacts. Further, much of it is pseudo-science masking subjectivity as objectivity. It is based on research that is incomplete and inaccurate (e.g. holiday cottages). There are a whole series of questionable assumptions, e.g. construction workers will spend as much money as tourists and whole areas of the economy are ignored e.g. inward investment and holiday cottage businesses.
- SPR's own forecasts indicate that at best, up to 100 FTE jobs will be created locally during the construction phase for the onshore infrastructure. The onshore infrastructure itself will create no permanent jobs post construction.
- SPR admit that onshore works have potential to 'disturb' tourists during construction. These proposals are likely to have significantly more impact on tourism than is disclosed by PEIR assessments. Recreational assets are wrongly identified as low assets. The nature and appeal of the Suffolk Heritage Coast is all about the freedom to roam and walk, to enjoy the unspoilt natural landscape and beaches. The AONB and coastal corridor is a major draw to overnighting and day trippers, where many visit the area to enjoy the walks and beaches as part of their experience, largely because these assets are considered unspoilt as **protected landscapes**.
- The PEIR report fails in every sense to identify and understand the unique appeal of the Suffolk Coast and wider area. Whilst it does attempt to consider offshore impacts, ie the impact of wind turbines visible from the Suffolk Coastal Path and beaches site fails to adequately assess the effect of the onshore development. These have by far the most impact on the wider landscape in terms of permanent features in the case of substations and temporarily in the case of a scarred landscape along the cable corridor/path
- The PEIR identifies that 32 public rights of way could be impacted on. Footpaths are essential to tourism and the draw of the AONB and Suffolk Coast, is the ability to roam and explore the unique landscape. It is not clear if/how these will be rerouted if some PRow's will be closed (if only temporarily). We are looking at possibly 7+ years of unknown disruption from the cable route with unquestionable disruption to & possible closure of sections of the Sandlings Walk, other PRow and coastal footpaths. Assuming the worst-case scenario, if peak construction occurs during the peak holiday periods traffic & congestion will be a big problem and disruption caused by footpath closures and diversions could effectively make much of the coast a no-go area at certain times.
- Driver delays would be a big factor in putting people off repeat trips to the Suffolk Coast. Repeat visitors are essential to the Suffolk Coast, and research shows day visitors, provide the highest number of visitors to the coast over the course of a year (many day visitors are repeat visitors). SPR states 'tourism is not growing in the area' but given that tourists visiting the Suffolk Coast generally spend more, any reduction due to associated disruption will have a significant financial impact on tourism businesses who are by far the largest employer in the proposed development area on Suffolk Coast.
- This development will change for ever the character and appeal of the village as an attractive place to live, to visit, or stay for a holiday. (30.1 Para.3) States: "*Some surveys explored the perception of associated infrastructure and found a significant negative view of this.... all groups surveyed (including in the National Grid study) did perceive negative impacts to the local area due to landscape and visual change*".
- Visitors have an excellent choice of hotels, B&Bs and self-catering holiday lets which are hugely underestimated. It appears SPR used Trip-Advisor as the main resource of tourism data. This is a truly shocking admission. It is lazy and shows a complete failure resource to understand how tourism works in the Suffolk Coastal area: For example:
 - Only data from Suffolk Secrets has been used to identify self-catering holiday accommodation cottages etc. There are many more privately rented cottages in Friston than identified. There are 6 self-catering holiday lets within 550m of the substations (Corner Cottage, Myrtle Cottage, St Marys Cottage, Woodside Cottages x 2 & Three Steps), plus there are over 10 further holiday lets in the rest of the village.

- There is no assessment of the impact on Friston, its pub or holiday accommodation, which will suffer permanently from the blight on the village and destruction of village amenity land including footpaths and walks north of the village caused by the substations.
 - The use of Trip-Advisor for identifying key tourism assets based on the number of 4 – 5 star reviews is risible. The Dolphin Inn is identified as a ‘major’ attraction due to having ‘several hundred’ reviews. It is a pub.
 - Snape Maltings, a short distance from Friston really is a major tourism attraction with shops, galleries, cafes and the internationally renowned concert hall and has hundreds of thousands of visitors throughout the year, yet it is NOT even mentioned in the PEIR. SPR do not seem to have grasped that their preferred access route from the A12 for all construction traffic is the same route followed by traffic heading for Snape Maltings.
 - Similarly, there is no mention of Leiston Abbey, another music venue, famous for intimate classical concerts and events and which is within 2km of the cable route,
 - Neither Sizewell Hall (Christian Camps and Conference), nor The Wardens Centre, are included in SPR’s assessment method, despite the fact that these both lie adjacent to the cable corridor, north of Thorpeness on Sizewell Common. These destinations are unlikely to feature in TripAdvisor despite have having several thousands of of visitors and guests each year. This re-iterates our view that SPR’s reliance on Trip-Advisor as its guideline
 - Trip-Advisor reviews concern peoples’ opinions of a restaurant, pub, accommodation, facility or venue. It is not used to review landscape value. Reviewers are not questioned or surveyed about wind energy and infrastructure! As onshore development in the Suffolk Coastal corridor to date has been in remote areas, well screened and largely without disruption, it is unlikely to have played a role in forming opinions of those visiting the Suffolk Coast. Scottish Power’s PEIR shows it has a vastly different perspective on the value of tourism to that of residents in the area.
 - Chapter 30.4 Para 40 Refers to a YouGov survey of 800,000, which found that *“80% of people agree that Wild Land Areas should be protected and 55% of people would be less likely to visit an area if industrial development were undertaken.”* This clearly reflects strong opinion about industrial development in a rural landscape. Scottish Power’s onshore substation development could result in a large reduction in those likely to visit or stay in Friston. It is definitely likely during construction and after development for negative TripAdvisor reviews to reduce the appeal of cottages and tourism businesses in Friston including the pub.
 - Other parts of this document address the effect of increased traffic on the lives of local residents. To this must be added the adverse effect of increased traffic on the local tourism industry
- There is a failure to appreciate that one of the key tourist attractions of East Suffolk is its peacefulness, tranquillity and landscape. There is no analysis of the damage to this and the consequent perception of the area and its attractiveness to visitors over a potential 7-year construction period and for many years thereafter given the detriment to landscape and adverse visual impact.
 - East Suffolk is a very popular cycling area. There is no analysis of the impact of these proposals on the attractiveness of the area to cyclists other than a wholly inadequate assessment of visual impact on cyclists on a single road (Grove Road).
 - There is no assessment of the demographics up of the present community of Friston and the impact on that community. Many residents are retired, in their 60s and 70s and contribute to the active community life of the village. Moving to Friston will be highly unattractive as a location for many years, if not decades given that the construction will not be finished until at least 2031 and possibly longer.

- Leaving aside the impact of other projects such as Nautilus and Eurolink, even on SPR's flawed assessment, screening by tree planting will not be effective until at least the 2040s, and never fully effective on the approach roads to Friston. Visitors to the village will be greeted by a blighted industrial landscape, far from the rural idyll that they may have experienced in former years. For the same reasons, moving away from the village will be very difficult as potential new residents will experience the same view. There will be little "new blood" coming to the village and the community life of the village will decline as existing residents grow older. As a result community life will be severely if not irreparably damaged.
- There is no acknowledgment, let alone assessment of the damage to "inward investment" to the area. Many people who live in Friston and the surrounding the communities initially came here as tourists/visitors and then chose to move here to retire. Many are relatively affluent, and bring significant income to the area by employing many of the local artisans to renovate and maintain their properties. They support many of the local amenities, shops, cafes, restaurants, entertainment venues etc. This investment will simply wither if these communities are not renewed because of the blight to the rural life caused by SPR.
- In conclusion, the Tourism section of the PEIR is heavy on words and reference to research, but much of it refers to 'onshore' windfarms, not 'offshore' There is poor reference to, or consideration of, 'onshore' substations and 'onshore' development requirements of offshore wind. The many surveys and references are not applicable to Scottish Power's plans for the Suffolk Coast AONB or Friston. Scottish Power have failed to follow the best practice as outlined by Professor C. Aitchison. They have failed to carry out their own surveys or research, of tourism businesses or actual tourists, assessments, and have relied upon a purely desk based assessment. This shows a total disconnect from the Suffolk Coast, its people, its communities and tourism mix. There is poor understanding of the causes and effects of their plans and this is compounded by the lack of mitigation proposals specifically in regards to offsetting damage to tourism.

APPENDICES:

Appendix 1 - Montage of Bramford Complex - to follow

Appendix 2 – Area Map - to follow

Appendix 3 – NGV Presentation - to follow

Appendix 4 Landscape Assessment by Michelle Bolger Associates (already with SPR)