

## **SASES - SCOTTISH POWER EA1N AND EA2 PROJECTS – 4 JANUARY 2020**

1. The notes below are SASES current suggestions of key issues for representations and are not exhaustive. You should consider what representations you want to make.
2. We suggest people state they support the representations being made by SASES and Friston Parish Council and then set out how the projects affect them.
3. **HOW? Go to SASES.ORG.UK**
  - Click on Home and scroll down
  - In the yellow block (ANNOUNCEMENT) follow the links
    - EA1N - PINS DCO APPLICATION
    - EA2 - PINS DCO APPLICATION
  - Register as an Interested Party for each project and make Relevant Representations by the **DEADLINE OF 27 JANUARY 2020**
4. **WHY?**
  - SHOW YOU CARE
  - YOUR LIFE
  - YOUR LEGACY AND COMMUNITY

### **SUFFOLK COUNTY & EAST SUFFOLK COUNCIL – KEY DATES AND CONTACTS**

- ESC Cabinet 7<sup>th</sup> January – East Suffolk Council Cabinet Meeting @ 1830 at Riverside Lowestoft
- SCC Cabinet 14<sup>th</sup> January Suffolk County Council (SCC) - Endeavour House Ipswich @ 1400
- East Suffolk Council Contacts
  - Leader - Steve Gallant - [steve.gallant@eastsuffolk.gov.uk](mailto:steve.gallant@eastsuffolk.gov.uk)
  - Deputy Leader – Craig Rivett – [craig.rivett@eastsuffolk.gov.uk](mailto:craig.rivett@eastsuffolk.gov.uk)
  - TJ Haworth-Culf – [terry-jill.haworth-culf@eastsuffolk.gov.uk](mailto:terry-jill.haworth-culf@eastsuffolk.gov.uk)
  - Jocelyn- Bond – [jocelyn.bond@eastsuffolk.gov.uk](mailto:jocelyn.bond@eastsuffolk.gov.uk)
  - Tony Cooper – [tony.cooper@eastsuffolk.gov.uk](mailto:tony.cooper@eastsuffolk.gov.uk)
- Suffolk County Council Contacts
  - Leader - Matthew Hicks – [matthew.hicks@suffolk.gov.uk](mailto:matthew.hicks@suffolk.gov.uk)
  - Cabinet member for Environment - Richard Rout - [richard.rout@suffolk.gov.uk](mailto:richard.rout@suffolk.gov.uk)
  - Andrew Reid – [andrew.reid@suffolk.gov.uk](mailto:andrew.reid@suffolk.gov.uk)
  - Russ Rainger – [russ.rainger@suffolk.gov.uk](mailto:russ.rainger@suffolk.gov.uk)

**PLUS DR THERESE COFFEY – [therese.coffey.mp@parliament.uk](mailto:therese.coffey.mp@parliament.uk)**

### **KEY ISSUES FOR REPRESENTATIONS**

#### **CUMULATIVE IMPACT**

- Sizewell C - DCO Application 2020?
- National Grid Ventures Interconnectors
  - Nautilus - Public Consultations in 2020
  - Eurolink - Plans to follow
- Expansion of offshore windfarms
  - Galloper
  - Greater Gabbard

## **HUMAN IMPACT**

- Vulnerable and ageing population
- Uncertainty
- Loss of footpaths and visual enjoyment
- Loss of equity and financial implications
- Quality of life damaged by noise and light pollution
- Damage to air quality
- Severance of village due to traffic impacts

## **LANDSCAPE**

- Severe landscape and visual harm that cannot be mitigated.
- Severs a substantial area of tranquil, open and deeply rural countryside.
- Changes the character of Friston.
- Highly questionable assumptions of mitigation planting.

## **HERITAGE**

- Site is ringed by listed buildings – five grade II, two grade II\*
- Impact assessments underestimate the impact significantly plus:
  - setting – ignores National Guidance
  - cumulative impact
- Visualisations/viewpoints are misleading
- Landscape mitigation does very little to mitigate heritage impact

## **SITE SELECTION**

- Defective process particularly with regard to National Grid works

## **LAND USE**

- Substantial loss (83 acres) of Grade 2 and 3 agricultural land
- Impact is understated

## **LIGHT POLLUTION**

- During construction
  - 24 hour security lighting at construction consolidation sites
  - Task lighting during 24 hour construction periods.....
- During operation
  - Security lighting possibly motion sensitive
  - Car park lighting possibly motion sensitive
  - For inspection/repair/maintenance
- Impact understated

## **SOCIO ECONOMIC – ONSHORE**

- No jobs from onshore development
- Damage to tourism – DMO report not addressed – loss of jobs
- No analysis of loss of “inward investment” – loss of jobs

## **FLOOD RISK**

- The current village drainage infrastructure is inadequate.
- SPR state clearly there is an increase in flood risk and sediment mobilisation due to the development.
- But does not show that proposed mitigation measures are sufficient, feasible or achievable.
- No assessment of the adequacy of the Friston Watercourse has been undertaken.
- SPR take no proper account of surface water flooding.

- SPR propose two new retention ponds on the substation site but ignore the existing field drainage system, which will be removed.
- These matters of environmental impact must be addressed prior to consent.

## **FOOTPATHS & PUBLIC RIGHTS OF WAY**

- The footpath (FP6) running north from the village to Little Moor Farm will be permanently closed
- This footpath is the historic parish boundary between Friston and Knodishall.
- An alternative route is proposed to run alongside the edge of Grove Road, close to the substation site. This is a very long diversion and most unattractive to potential users, due to loss of tranquillity and landscape features.
- 26 other Rights of Way along the cable route will be “temporally” closed or diverted for unspecified periods.

## **ONSHORE ECOLOGY**

- Permanent removal of approx. 30 acres of wildlife habitat across the substation site.
- This includes the permanent removal of four badger setts and several bat-roosting sites, together with hedgerows forming foraging routes.
- There will be permanent effects on birds and wildlife due to light and noise pollution from the substations.
- During the lengthy construction period all types of wildlife along the cable route will be disrupted and/or displaced.

## **SUBSTATION DESIGN ISSUES**

- SPR have not listened to our requests to reduce the visual impact of their substations
- Harmonic filters at 18m are the tallest items proposed, and were 21m until noise screening was removed by popular request (was this a good idea?)
- Other wind farm substations have much lower profiles (e.g. Rampion substation in West Sussex has almost nothing above 8m - a ‘low impact design’)
- Current SPR design principles only concerned with the visual appearance of building structures, not engineering elements. This is unacceptable.

## **NOISE**

- 34dBLAeq5min reference level now proposed rather than 35dBLAeq15min, but currently applies only to SSR2 and SSR5 NEW, rather than all residential locations
- Super-grid transformers and their cooling fans are noisy, but Harmonic Filters now identified as noisiest items (and tallest at 18m), and are now unscreened
- SPR claim no ‘humming’ noise (‘Tonality’) but this will be disputed as it affects ‘Impact’ ratings
- Without a ‘Tonality’ correction noise levels may be almost 3 x greater than at Bramford (+5dBA).
- Impact of atmospheric effects is a further concern.
- The community should demand no discernible noise from the substations inside or outside our buildings day or night, to be proven by measurement after construction, not just on paper

## **TRAFFIC & TRANSPORT**

- Proposals include:
  - Changes to A12/A1094 junction (Friday Street) and A1094/B1069 junction Blackheath Corner
  - Pre-Construction access to the development and haul road at the junction of Church Road and Grove Road
- Scottish Power will only monitor passage of Heavy Goods Vehicles
- What routes will all other traffic take and the relative risks
  - A1094 to Aldeburgh

- B1069 Blackheath Corner to Leiston
- B1122 Aldeburgh to Leiston
- Friston most at risk – B1121 Aldeburgh to Saxmundham Road;
- Mill Road almost single track by-road no pedestrian pavement;
- Grove Road is narrow, twisting and turning with no pedestrian pavement already a heavily used cut-through to Knodishall, Saxmundham and Leiston
- Key Safety Issues
  - Traffic flows and speeds.
  - Drivers seek alternative routes and lanes become “rat-runs”
  - Impact on emergency vehicles access and timings.
  - Protection for walkers and cyclists.
  - Sizewell Evacuation Plan

## **CABLE CORRIDOR ISSUES**

- Landfall at Thorpeness: fragility of the cliffs
- A 9Km long cable route impacting numerous receptors including TPO (SCDC/87/00030)
- The Aldeburgh Road “pinch point” cable crossing : no evidence that SPR has properly considered the feasibility of other crossing points such as further north near Thorpe Road
- Destruction of large area of woodland both sides of the Aldeburgh Road contrary to SPR’s Cable Route Design Principle : to “minimise interaction with mature woodland“
- Ecology and ornithology surveys outside AONB are not complete
- Cable corridor is sited unacceptably close to residential properties
- Cable corridor sited much closer (too close) to some residential titles than previously specified
- Concern that the construction noise assessment and impact on residential titles has been underestimated – no commitment to mitigate noise, dust etc
- Landfall and haul road CCS’s : SPR did not consult on siting of the latter; light pollution issues
- No commitment to restore woodland and no commitment to remove all haul roads and return land to as before
- Assessment of and management of construction traffic impact (highway and haul roads) is also suspect
- Flood risk at River Hundred crossing during construction not addressed
- No cumulative assessment with other forthcoming projects and SPR’s plans not to “sterilize” the cable route for other projects to build cable corridors alongside EA1N/EA2”
- Relevant representations – 27 January 2020

## **NEXT STEPS**

- Preliminary meeting – March 2020 (tbc)
- Written representations and hearings - March to September 2020 (tbc)
- Examining authorities report by December 2020(tbc)
- Secretary of State decision March 2021 (tbc)

## **KEEP UP TO DATE WITH PINS WEBSITE**

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