

These are the relevant representations of SASES ([sases.org.uk](http://sases.org.uk)) and Friston Parish Council.

## 1. INTRODUCTION

The proposed developments will have a significant adverse impact on Friston and the surrounding area from the onshore elements of the schemes which involve the construction of a substantial and visually intrusive substation complex together with a new National Grid connection hub, and a five mile cable route partially through an AONB. The substation complex and National Grid hub would cover 12 hectares (30 acres) and be up to 18m (60 ft) high, in a tranquil rural area, next to the historic village of Friston.

In respect of the cable route we support the representations of the parishes and residents directly affected by the cable route.

Our case is that the impacts on Friston and the surrounding area are so severe that development consent should be refused, or alternatively granted only for the offshore elements. The proposals should be regarded as contrary to the relevant National Policy Statements and in any event there are compelling reasons to refuse development consent. The adverse impacts, including in respect of visual intrusion and landscape harm, heritage harm, noise and flood risk, cannot be mitigated to levels which could be regarded as acceptable.

Our objections arise because of the impossibility of mitigating the impacts/the inadequacy of the mitigation proposed in respect of these projects. We will prepare expert evidence to support the principal issues set out below.

## 2. SITE SELECTION/NG NSIP

The Applicant's site selection process and the justification for a new grid connection in this location are fundamentally flawed. The National Grid substation/site/connection hub will be used for a number of projects and is an NSIP in its own right but NG's decisions, including site selection, have not been subject to an NSIP process. The manner in which NG's grid connection decisions have been made needs to be scrutinised.

## 3. LANDSCAPE

- The site selection and micro-siting process is flawed with regard to landscape and visual effect. It is not transparent, contains unidentified assumptions and reasoning, and no genuine alternatives have been considered.
- As a consequence of a flawed site selection process, the substations would cause severe landscape and visual harm that cannot be mitigated. The harm is so severe as to justify the refusal of development consent.
- Due to inappropriateness of location the substations would:
  - sever a substantial area of tranquil, open and deeply rural countryside;
  - conflict with the prevailing unified character of their surroundings;
  - permanently stop up PRowS and substantially harm the wider PRow network;
  - Require an excessively long and wide access road, 1,700m long and 8m wide;

- Change completely the character of Friston;
- Harm the setting of Friston Church (Grade II\*);
- Require a 9km long cable route which would impact on numerous receptors and the setting of Aldringham Court (Grade II).
- Planting cannot mitigate development in the wrong location & given local soil and climatic conditions the assumed growth rate of mitigation planting is highly questionable.
- The substations and ancillary infrastructure are arbitrarily and unsympathetically imposed upon the existing landscape framework. Micro-siting and mitigation do not minimise potential impacts.
- Concerns regarding the LVIA include but are not limited to:
  - an absence of plans showing the scheme and Friston village together.
  - questionable judgements regarding sensitivity and magnitude of change.
  - the use of Suffolk County LCTs instead of more up to date LCAs from Suffolk Coastal and lack of justification for subdividing these LCTs.
  - lack of detail regarding significant infrastructure components e.g. the access road.
  - absence of viewpoints from the footpaths north of the site (e.g. showing relationship between the church and site).

#### 4. FLOOD RISK

- SPR has not adequately or accurately assessed flood risk impact to Friston which is prone to flooding.
- The elevated baseline flood risk to Friston village from surface water is not given the same focus as other lower flood risks.
- The proposed mitigation measures:
  - do not demonstrate that the increase in flood and sediment mobilisation risk to Friston, during either construction or operation, can be addressed;
  - are not demonstrated to be feasible.
- These matters cannot be left to the subsequent discharge of requirements. The proposals need to be subject to full environmental assessment with regard to flood risk and to sequential testing and the application submissions are flawed in this regard.

#### 5. HERITAGE

- The project at the substation site will impact upon at least five Grade II and two Grade II\* listed buildings.
- The felling of trees on the cable route to the south of the Grade II-listed Aldringham Court negatively impacts the setting of the building and its landscape.
- Heritage impacts are underestimated significantly as is the cumulative heritage impact on the cluster of listed buildings which surround the substation site.
- There is only a visual assessment of setting with little regard to wider identification and assessment of setting.
- The viewpoints and visualisations are highly selective and do not include key views.
- There is an historic parish/hundred boundary in the middle of the substation site.
- The mitigation proposed does very little to reduce the heritage impacts.

## 6. NOISE

- The Environmental Statement has many errors and omissions.
- The proposed 34db LAeq 5min as a limit is unacceptable in a tranquil rural environment with a low night-time noise level and there is no evidence that it will not be intrusive in a tranquil rural environment.
- Failure to apply a tonality penalty is unacceptable and unjustified.
- There is no evidence that there will not be one off random noise events.
- The overriding community requirement is for residential and recreational property (both inside and out) to be free at all times from perceptible substation noise.
- Any agreed limit must be achievable and enforceable at any time under any environmental conditions.
- Restricting noise testing to only two locations is unacceptable.
- Compliance with all agreed noise limits shall be mandatory throughout the life of the projects, as plant as it ages can become noisier.
- Given the hours of working and the proximity of the substations site and cable route to Friston/residences construction noise could be very intrusive.
- These matters cannot be left to the subsequent discharge of requirements. The proposals need to be subject to full environmental assessment with regard to noise and to sequential testing and the application submissions are flawed in this regard.

## 7. SUBSTATION DESIGN

- The focus is only on aesthetics not the best possible engineering/configuration of the substations to reduce their size, noise emissions etc to achieve “low impact”. An independent engineering authority should verify any design proposed (including the land requirements) meets these criteria.
- National Grid’s developments should be subject to the same design criteria/requirements as SPR’s.

## 8. LAND USE

There is a significant loss of Grade 2 and 3 agricultural land, over 30 hectares.

## 9. ONSHORE ECOLOGY

- The projects will involve the loss and disruption of habitat for badgers, bats, owls, great crested newts, adders and other wildlife.
- Four active badgers setts will be destroyed at the substations site.
- Bats are present at the site and along the cable route including the rare lesser horseshoe bat.
- All wildlife will be disturbed by noise and light pollution both during construction and operation at the substations site.

## 10. TRAFFIC

- The A12 / A1094 junction is an accident blackspot. The mitigation measures are inadequate. Further any introduction of a roundabout will cause serious congestion on the A12 with slow braking and accelerating HGVs.
- There is a risk to the journey times of emergency vehicles.
- Only Heavy Goods Vehicles (HGVs) traffic will be monitored. No monitoring commitment is given regarding the passage of all other types of vehicle, particularly on local minor roads which could become “rat-runs”

A pre-construction access is proposed to the development from the junction of Church Road (single track road) and Grove Road. This could have significant impact upon the residents of Friston, walkers and cyclists.

## 11. HUMAN HEALTH

- There is little in the way of an objective assessment of the human impact of the projects upon the local population a significant proportion of which is elderly and/or retired.
- SPR dismiss anxiety as a “perception”. Anxiety is very real to a person suffering from it.
- SPR has not carried out a survey of the actual demographics of Friston or those living near the cable route, so its assessment of human impacts is not reliable.
- Anxiety will arise from:
  - the traffic and the noise, air, light pollution and disruption associated with a potential construction period of 5/6 years even before the impact of other projects
  - the permanent loss of amenity (footpaths etc), tranquillity, landscape/heritage damage, and noise and light pollution
  - financial uncertainty

## 12. FOOTPATHS

- The proposals will necessitate the permanent closure of a well-used footpath leading north from the village of Friston, causing a major loss of amenity.
- There are a further 26 PROWs throughout the onshore development area, which will be temporarily closed or diverted for unspecified amounts of time with a major loss of amenity.

## 13. TOURISM AND SOCIO-ECONOMIC IMPACTS

- Onshore development elements contribute very little to the local economy during construction and nothing post construction.
- The loss of amenity etc. both during construction and thereafter will damage tourism and there has been no assessment of cumulative effects.
- There has been no analysis of damage to “inward investment” as a result of the area being a less attractive place to live.

## 14. LIGHT POLLUTION

- There will be significant light pollution given the “dark skies” of the present rural environment, both during construction (particularly at construction compounds) and operation.
- During operation there will be security and car park lighting, which even if of the movement sensitive type, will be frequently triggered by wildlife.

#### 15. SAFETY

- No safety case is provided for the substations. Fire and explosion are not unknown at substations. There is no quantification of the risk including in respect of gas insulated switchgear.
- The safety and security of all residents and workers within a 30km radius of Sizewell B is secured by an evacuation plan in the event of a nuclear accident and no consideration has been given to the impacts of the proposals on that plan.

#### 16. CUMULATIVE IMPACT

SPR has not properly addressed the impact of the developments with 5 other major energy projects in the same area, Nautilus, Eurolink, Galloper expansion, Greater Gabbard expansion and Sizewell C. There is a direct link between the proposals and elements of those projects in light of their likely grid connections.

#### 17. PROJECT DOWNSIZING

A number of windfarm projects (including Scottish Power’s) are built with a substantially reduced generating capacity post DCO. SPR has not addressed how any reduction in generating capacity will reduce the scale of the onshore development.

#### 18. FUNDING ISSUES

SPR’s funding position is not clearly established in light of the contract for difference regime

#### 19. DCO

The DCO contains inadequate provisions for securing the mitigation of the adverse impacts of the proposals, and would grant excessive flexibility to the developer to determine the form of the development after consent.