

**Response from Friston Parish Council to the Community Consultations by Scottish Power Renewables for East Anglia One North and East Anglia Two offshore wind farms and onshore connection and substation developments Phase 3.5.**

Dear Sir/Madam

The details outlined in this Phase 3.5 consultation response are in addition to the Friston Parish Council Phase 3 response dated 9 August 2018. They also stand in addition to and alongside the Phase 3.5 response being made by the SASES Working Party of the Parish Council, the contents of which the Parish Council endorses.

We welcome the additional Phase 3.5 consultation regarding EA1N and EA2 proposals by SPR. The Phase 3.5 consultation shows that SPR has listened to the concerns of residents, business owners and visitors along with input from Suffolk County and East Suffolk Councils and other interested organisations by giving proper consideration to the potential use of the Broom Covert site at Sizewell as an alternative to the Grove Wood site proposed at Friston which this Parish Council regards as entirely unsuitable.

The Parish Council continues to believe that a Grid connection in the Sizewell/Leiston area is highly unsuitable and undesirable and that none of the substation sites proposed by SPR are acceptable in this rural area dominated by a tourist-based economy. But the Broom Covert site on EDF land near the coast would have much more limited both long and short-term environmental and community impact than the Grove Wood, Friston site, in particular by making further use of a screened site already housing wind power substations, but also by greatly reducing the need for an inland cable route.

Nevertheless, if in spite of the above, SPR decide they wish to progress the Grove Wood site the proposed plans from the Phase 3.5 consultation raise a number of new concerns for the site in addition to our concerns in our previous letter:

**Flood Risk:**

- The existing flood risk within the proposed area and its impact on the village of Friston has still not been given the due consideration needed to alleviate concerns raised at Public Information Days (PIPs).
- The proposed substation drainage route at Grove Wood offers no detail of how water would runoff into the watercourse. It shows it flowing into the area around the ford, public footpaths and residential access. This is an unsuitable access point given the risk from contaminants, safety issues and a pinch point with existing surface water runoff. The river bed through the village lacks a thorough maintenance regime and together with previous blockages further south, has resulted in a cumulative effect of flooding to the areas of Low Road, Grove Road and around the village green in previous years.
- There are many properties along the Friston river that are classified as Zone 3 flood risk (Environment Agency and insurance companies). With the added pressures from surface runoff from the proposed substations there is a real possibility that a

significant number of additional properties could be affected financially as well as physically through a more widespread risk from flooding. This would be entirely unacceptable.

- The proposed substation drainage route at Grove Wood would need to remove the Friston village allotments. These allotments offer a vital amenity for residents and are a well used asset that has been nurtured over a number of years. Their removal would be unacceptable.
- The ‘indicative sustainable urban drainage solution’ proposed at Grove Wood lacks any detail regarding its design, maintenance or performance at preventing large amounts of surface water discharging into the Friston watercourse from the substations. The NPPF requires that new development shall, wherever possible, reduce existing flood risk, but SPR have failed to provide any targets whatsoever for the level of mitigation to be achieved.

#### **RAG Assessment/ site selection:**

Using the RAG assessment throughout the initial consultation as a primary selection tool has given undue bias to site selection. The RAG assessment lacks consistency, contains flaws and is limited in its transparency to fully assess sites effectively.

- The W1 and W1a zones (Zone 7) have criteria that are questionable in their classification as green on the RAG grid. For example, under the ‘landscape character and sensitivity to development’ criteria, the Grove Wood site is given a green rating (lower sensitivity). How can an area of with no industrial development have a low sensitivity to development? Building three massive substations would have a highly detrimental impact on the landscape character.
- Another example of poor research in the RAG assessment is the proximity to Grade II and II\* listed buildings. There are at least four buildings with a direct viewpoint of the proposed development and at least a further four that are within a similar distance to the site. The character and settings of these buildings would be severely impacted.
- The RAG assessment also does not have a red indicator for the ‘public rights of way’ criteria. The proposed site for the substations at Grove Wood would be sited on a public footpath that is very well used. This footpath would have to be removed and re-routed if at all possible and therefore it seems dubious to place it under an amber criteria rather than a red one.
- The problems of flooding have been highlighted above but are also misleading within the RAG Assessment. Clearly use of the site is likely to increase the existing risk of surface water flooding in Friston village but no comparative RAG criterion has been provided for this risk at Grove Wood or any of the other sites. This is inconsistent with SPR’s commitment in their original Scoping Report to avoid where possible sites which might cause flood risk. On this basis alone the Grove Wood site should have been eliminated.

- The ‘proximity to residential properties’ criteria fails to show the real impact of the proposed substation development on the properties in Friston. There are more than 20 properties within 500 metres of the substations many with a direct viewpoint. The visual montage document shows the substations are visible from the village green more than 750 metres away, with half the village within 1km of the site. The criteria is green if properties are over 250 metres away. The distances are conveniently selected to skew the outcome of the assessment.

-The same company (Royal Haskoning) carried out a RAG assessment on the Galloper Wind Farm project at Sizewell where the criteria assess whether the substation would be ‘visible from dwellings within 1km’ with additional criteria for ‘visible from principle settlements’, ‘...visible from primary vehicular routes’ and ‘consistently visible from public rights of way’. If these criteria were included in the SPR RAG Assessment then a different outcome would be concluded. The proposed SPR substations are substantially larger and would be less well screened (than the Galloper or Greater Gabbard substations) and therefore would have a much higher visual impact on residential properties which should have been reflected in the RAG assessment.

- The idea that the site at Friston has ‘no constraints to access’ in terms of highways access shows the RAG assessment contains huge errors. This should be red for Grove Wood as the roads surrounding the village are narrow and not suitable for HGVs, abnormal loads or access points to the proposed haul road. This criteria is red for the EDF site. This is inexplicable as this site is adjacent to a Council approved HGV route. Does this take into account other energy developments nearby (Sizewell C only just announcing their next consultation phase) or does it mean using one main road limits access? The specifications surrounding the criteria need to explicit in order to show fair appraisal for each site.

#### **Noise:**

- An issue of great concern to Friston residents is that of noise from the substation equipment. The low level intermittent sounds from daily community life including transport and farming activity are well tolerated and part of the rural environment. But noticeable ongoing unnatural buzzing or humming sounds from substation equipment, or worse, corona discharge noise, would be wholly unacceptable, especially at night when the background sound level is normally extremely low.
- No adequate commitments have yet been received with regard to the mitigation of noise impact from SPR’s substations and it is essential that this ensures that substation noises are at all times inaudible below the prevailing background level, especially at night. There is a particular concern that the underlying hard subsoil may carry ground vibrations an even greater distance than airborne sounds and it is essential therefore that any SPR or NGET substation implementations fully address both airborne and ground-borne vibrations.

- It is also essential that noise from the substations does not impact on the enjoyment of the various public footpaths in the area, including any that may be diverted as a result of the site works. This is so important in retaining the attractiveness of the area as a tourist location.

### **Substation Design**

- The visual impact of any substations that may be built is also of great concern and the Parish Council wishes that maximum attention be given by SPR to design options which may reduce the height and bulk of any substations that may be built, notwithstanding the priority which must be given to noise mitigation. Comparison with wind farm substations being built elsewhere indicates that with proper attention the height of substations and associated buildings may be markedly reduced and it is essential that this be addressed, rather than SPR serving up a generic design that has been derived from a site with far less landscape sensitivity.

### **Transportation:**

- The Phase 3.5 Consultation Information Leaflet maps outline the increased road usage that would affect the site at Grove Wood in comparison to the EDF site. There is need for more access points along narrow well used roads that are unsuitable for prolonged heavy use by HGVs given that the Grove Wood site is far from the landfall site.
- The route of the abnormal loads to the site at Grove Wood clearly has not been properly assessed on site. The routes passes through Leiston and Knodishall, a road that is not designed to carry or accommodate such huge loads. The Yoxford to Sizewell road has already shown its capacity to carry abnormal loads.

### **Landscape Impact**

The SASES Working Party of Friston Parish Council commissioned an independent landscape report that shows the Friston site to have a high landscape value which is counter to the RAG assessment. The three huge substations would hugely damage the rural landscape, village setting and amenity land within and around the village. Building the substations at Broom Covert in an area in close proximity to existing industrial developments would by comparison have only 'moderate impact' on the landscape.

### **Cumulative Impact**

A further issue of great concern is the cumulative impact of the SPR projects taken together with the proposed NGV Interconnector projects, the potential construction of Sizewell C and likely additional future wind farm projects. There is no adequate information in the Phase 3.5 documentation on such issues. Even superficial consideration of these other projects makes it obvious that the guidance given to SPR by National Grid to use 'Sizewell/Leiston' as their connection point to the transmission network is hopelessly impractical without the long-term wholesale destruction of the East Suffolk rural environment and the tourist economy on which it is so reliant.

Therefore the Parish Council requests that Scottish Power urgently works with Government, National Grid and the other energy companies to identify and adopt an altogether more suitable point of entry into the energy grid than 'Sizewell/Leiston'.

Yours sincerely

FPC