

From: [REDACTED]
To: [East Anglia ONE North](#); [East Anglia Two](#)
Subject: Written Representation
Date: 02 November 2020 15:29:06
Attachments: [REDACTED]

Dear Mr Smith and Panel

Please find attached my Written Representation in relation to the examination of the applications for development consent by SPR in respect of proposed offshore windfarms EA1 and EA2.

Yours faithfully

Fiona Cramb

EA1N 20023282
EA2 20023287

FIONA CRAMB, [REDACTED]

WRITTEN REPRESENTATION

**TO: INSPECTORS RE SPR DCO APPLICATIONS FOR
WINDFARMS EAIN AND EA2**

My reference EA1N 20023282 / EA2 20023287

A. Summary of submissions

1. Summary:

- The submission focuses upon the impact of the development on [REDACTED] and the local environ.
- No objection is taken to the application insofar as it concerns green, wind, energy. I support green energy, including wind energy.
- Objection is taken to the inadequate way in which the consultation occurred including particular as to the shrouded role played by National Grid.
- Objection is taken to the misleading manner in which the SPR application is drafted which, whenever impact arises concludes that it will be minimal or minor.
- Objection is taken to the fact that in relation to some key issues SPR seeks to avoid having to address them during this process saying that it will address them only after consent is given.
- The impact of the development on local communities will be massive. SPR's protestations to the contrary are disingenuous. The substation will eradicate ancient pilgrimage and communication routes between to and from Friston, affecting not just Friston but also Saxmundham.

- These routes are major local amenities. They are important recreational facilities. They are used intensely on a daily basis.
- There is no conceivable mitigation for this loss.
- The impact must take into account NG's plans to use Friston as a hub and plug. The proposed site is tightly constrained. The impact of even the planned development is isolation is vast; the impact of a series of successive developments will be catastrophic.
- If consent is given the remaining years of life for very many in the community will be profoundly blighted. This process is already causing mental health problems, anxiety, depression and stress.
- So far as choice of site is concerned, there is simply no good reason why SPR and NG have to despoil Friston and its locality. There are many alternatives.

B. Outline of submissions

2. In these submissions, I focus only upon a limited number of points of particular concern to my family and our home of more than 20 years at [REDACTED].
3. I endorse all of the submissions of SASES and SEAS. I particularly endorse the submission of very many others to the effect that this proposal will harm an entire community for years and decades to come. The strain of the present procedure and the prospect of what is to come has and will continue to cause depression, anxiety and mental health issues. Friston is a community of largely senior citizens. If consent is granted for many the remainder of their lives will be blighted.
4. Further to my oral submissions I am providing further information about [REDACTED], about the impact (individual and cumulative) of the proposed development upon the house and the local environment. I have also provided, as requested, a reference to the

article from The Times to which I made reference during oral submissions.

5. I would make clear from the outset that I am a strong supporter of green energy, including wind energy. There is no objection to the siting of wind farms off the coast of Suffolk. The objection is to the utterly destructive placement of on-shore substations in the heart of ancient countryside within – quite literally – metres of the residents of the village of Friston and of my home.
6. One of the unsatisfactory aspects of the present procedure is that the extent of National Grid (NG) infrastructure remains shrouded in secrecy. They are fundamental to this project, yet we have been given little about their plans. Why is NG not seeking DCO for their developments? Examples of their involvement, which are only slowly coming to light, raise deep concerns. For instance in relation to the cooling systems that NG might need to use (GIS and AIS) evidence to date suggests that there are real environmental problems with either option which could impact harmfully upon the environment and local amenity. I leave it others to expand upon such concerns.
7. In addition, it has become apparent that there will be cable sealing ends, gantries and a new pylon located very close to [REDACTED]. We were only made aware of this very late on during the consultation process in which NG took no part, despite their pivotal and shadowy role in the selection of the connection point at Friston and their plans to construct a new NG substation designed to facilitate the connection of up to 8 other projects at Friston.

C. [REDACTED] and its connection to Friston

8. [REDACTED] is a three-storey dwelling. It was built upon the foundations of a 13th dwelling. The central part of the house dates from circa 1550. An extension (comprising the present day sitting room) was built in the early 1600s and a larder and large store room was built in the late 1700's. The house was restored in the early 1990s.

It is grade 2 listed. The restoration was performed to a very high standard.

9. The House sits alongside a second building, “the Granary”. This is a quite discrete dwelling. Council tax is paid upon it. It is believed to date from the 17th century and was converted into a dwelling at the same time as [REDACTED] was restored. The Granary has been used as a *separate* dwelling for many years. It has for example been inhabited as a separate residence by various members of the family and their partners.
10. Adjacent to [REDACTED] is Fristonmoor Barn. This was restored and converted into a dwelling at about the same time and is owned separately.
11. This complex of dwellings is found at the end of a bridle path that will have existed since the first dwelling on the site in the 13th century. Originally it formed part of the network of roads or paths linking St Peters Church at Buxlow to the church at Friston and to other churches in Saxmundham. The Buxlow church is believed by local historians to have been that referred to in the Domesday Book which had an entry for churches connected to Saxmundham and appears to refer to a church on the site of St Peters. It is recorded as having fallen into disuse as a result of the suppression of the Church of England during the Commonwealth. As from 1660 it failed to appoint rectors.
12. It was demolished during the late 1660’s for building material. A number of doors, dating to the 13th century, were incorporated into High House Farm at some point in the late 17th century and various pieces of ornate carved stone were also incorporated into [REDACTED] at various points in the past.
13. The path from [REDACTED] to Friston was part of this network of interlinking routes. Not only were these main routes of communication they were also pilgrim routes connecting the local churches.
14. [REDACTED] is one of the properties which will be isolated from Friston by the substation. Other properties include Little Moor Farm and Cloutings Farm. Properties on Grove Rd also use these paths to communicate with Friston.

15. It is not only these circular connecting paths which will be lost. There is a popular walk of about 2 miles which connects Friston to Saxmundham and which also follows old pilgrimage routes. This walk presently has two limbs to it. The first is the track from Friston Church to Little Moor Farm from where there is a turn towards Cloutings Farm and then to [REDACTED] which connects to the bridle path and track to Saxmundham. The second route is from the Church under the pylons to High House Farm which then connects onto the bridle path and Saxmundham path.
16. Both of these ancient yet popular recreational routes will be lost. The paths represent amenity, not just for Friston but also for Saxmundham. We know that residents of Saxmundham walk these paths frequently.

D. The importance of the connecting routes

17. The loss of the routes referred to above will have a real impact on the community.
18. In this context the SPR plans seems to have been deliberately drafted to paint a picture of the substation being located on an isolated site, and not one which amounts to a truly significant network of connections between communities. The maps conveniently miss off the village of Friston. Throughout their application SPR downplay the impact of their proposal. Every time there is an impact which common sense indicates will be enormous, says it is “minimal”. This is their drafting technique.
19. The land between [REDACTED] and Friston is tightly constrained. The substation will decimate the connections which we all so regularly use to link to our nearest village, to its church, to the pub and to where many of our friends live. We will be isolated from our village.
20. The paths which criss-cross the land between the village and [REDACTED] [REDACTED] and other dwellings nearby and on Grove road are used **extremely frequently**. They are common thoroughfares. They are frequented at all times by walkers, often accompanied by their dogs.

They are an important amenity for **everyone** in Friston and not, of course, just those living in the dwellings such as [REDACTED]. Over the years I have come to meet many of those I treat as friends on these paths. They have been my points of first introduction.

21. Of course, SPR is dismissive and unconcerned. The notion that some future planting exercise could amount to mitigation is preposterous.
22. SPR suggest that they will re-route the paths. Once again this cannot sensibly be viewed as mitigation. A path which skirts part of the outside of a huge industrial structure is not mitigation. It can afford no pleasure or real amenity to the local population and it will not recreate the lost connections and cannot replicate their cultural and historical significance.

E. Impact on [REDACTED]

23. I must state the obvious. [REDACTED] will be blighted for years, and possibly decades, by noise, dust and pollution from construction. Once that is finished, there will be a vast industrial infrastructure the boundary of which abuts and touches the perimeter fence of my home. Huge pieces of equipment will be only metres away from the garden.

F. The misleading way in which [REDACTED] is described in the application/ heritage assessment

24. The SPR application misleadingly assesses the impact on [REDACTED] in the LVIA and in the Archaeological and Heritage assessments of the Environmental Statement. It is said that the impact of the construction and the substation will have a minimal impact on the setting and heritage value of [REDACTED].
25. In App 24.7 various assessments are set out. These rely upon two different viewpoints; one which is LVIA VP5 and which is CH VP3.

26. Neither of these viewpoints show the view from the actual house to the village. See attached Drone photo below annotated to show the viewpoints SPR use for their assessment.. This seems to have been taken deliberately from the most irrelevant vantage points that could possibly be chosen. This is characteristic of the approach taken in the application as a whole. These vantage points have self-evidently been selected to support the misleading conclusion that the overall impact is minimal.
27. SPR also claim that impact will be minimal because there exists, already on the site, mature planting. This is nonsense. The village and the church can be clearly seen from many points around the house and gardens and this is so both in summer and winter. Moreover, we are unfortunately in the process of removing a significant number of trees that are blighted with Ash Die Back which will further increase our exposure to the site.
28. The position of SPR is also inconsistent. At the same time as saying that the impact will be minimal, elsewhere in the application (for instance 24.41) SPR accepts that following construction the buildings will be “*prominent*” and they will be “*widely seen from the surrounding landscape*”. They necessarily accept that there will be spoiled views from the footpaths. They accept that this will therefore be a fundamental change to the heritage value of [REDACTED] and of course all other dwellings in the area. This is the context in which they then, inconsistently, assert that this “*would not change the immediate setting of [REDACTED], nor would it interrupt the close spatial links between this asset and the other historic assets around the edge of the former Friston Moor*”. SPR’s conclusion is that the impact will be “*minor*”. The notion that interposing a vast structure next to our house and between us and the village will create a minor impact beggars belief. The boundary of their site is the boundary of our house. They have thereby sought to avoid having any obligation to purchase our house by drawing their boundary to exclude our property. This is reflective of the cynical way in which SPR has drawn the boundaries of its site to (i) avoid compensating owners and (ii) gives them the opportunity to artificially diminish the impact on those dwellings.

29. SPR also discounts noise. It is said that SPR will address this later and that measures taken after the event will be sufficient. In this way, they seek to pull themselves up by their boot straps. However, in Chapter 25 (Noise) and in particular 25.28 SPR accepts that there will be construction 6 days per week and that there might be “*other*” night time work, especially on the NG aspects of the construction. Yet SPR says that the impact of the noise during construction would be “*negligible*”. This is patently nonsense.
30. As to post construction operational noise, SPR says that site specific solutions are available, but they will only provide solutions post DCO grant. This is designed to avoid having to set out mitigation steps now. It prevents consultees who are obviously affected from making submissions. This deferral of the issue into the long green grass should not be tolerated. We are entitled to know NOW what the noise implications will be. How can SPR say that the impact will be minimal if they are unwilling transparently to set their store out now. In any event the fact that SPR accepts that mitigation will be needed is a clear admission that there will be an adverse noise impact.

G. Timeframe

31. An issue of profound concern to all residents in Friston is the timescale of the proposed development. Throughout, starting with the first consultation and continuing, SPR has been tight lipped about the true plans and proposals for the site. As the inspectors will be aware there is strong evidence indicating that SPR and NG have plans to make Friston a hub and plug for a series of interconnectors. Yet, throughout, when questions have been asked both SPR and NG have been evasive.
32. This is an issue of great importance since it will govern the length of time that construction disruption will last for and it affects all aspects of impact and mitigation.
33. But even if this were a strictly limited single project SPRs time estimate seem highly optimistic. For example, it says that construction

at Friston would take 3 years per substation only but then admits that the NG infrastructure will take 4 years. I am quite sure that all inspectors know that times actually taken exceed significantly the wishful thinking inserted into applications.

H. Mitigation and soil

34. SPR suggests that tree and hedge planting can provide mitigation. This is set out in the OLNP. SPR suggests that they will establish historic field boundaries, they will respond to concerns about the maintenance of views towards Friston Church, they will ensure the retention of historical farmhouses in an agricultural setting. The OLNP continues in similar vein.
35. Such is the artificiality of this section that it might be suspected that it has been lifted from some other application by mistake. How can the superimposition of a vast industrial structure in fields in the midst of village be mitigated by the reinstatement of historical field boundaries that the structures destroy, or maintain views that are destroyed or ensure historical building in the setting?
36. Indeed, in the 15-year post construction visualisation prepared by SPR the substation is still visible, even from the unrepresentative visualisation viewpoints chosen by SPR to be reflective of the impact on [REDACTED]. As matters stand SPR is not even planning to adequate screening to the [REDACTED].
37. I am sure that the Inspectors will understand the impossibility of this. The soil in this area is largely heavy clay. There is a high probability on this soil that newly planted trees and hedges will fail or be stunted. This affects the timeframe over which any mitigation would occur, as well as its effectiveness.

I. The choice of Friston as a site

38. Friston is the wrong choice of site. Of the small number of sites SPR considered the majority were ruled out due to the weighting given to ANOB status in the RAG assessment.
39. NG has clearly chosen the Friston site as the connection point for up to 8 other projects. How can a tightly constrained site on the edge of a village be appropriate for industrial construction on this vast scale?
40. SPR and NG have failed to provide answers as to why the Bawdsey to Bamford cable route is not being used as originally intended. No clear explanation has been given as to why the technology was downgraded reducing capacity and indeed why available technology is not being used to connect EA1N and EA2 to the grid via this route.
41. Why it necessary to despoil another huge area of rural East Suffolk and build a new NG substation when a connection point already exists at Bramford? Alternatively siting the substations at Bradwell or another brown field site would be less damaging to the environment.
42. SPR and other developers continue to push forward with these applications when it is clear that these types of individual projects are unsustainable. The Government's laudable green targets cannot be met by the wide scale destruction of the countryside resulting from the excavation of huge numbers of cable routes. Projects should be paused awaiting the outcome of the BEISS review.

43. What is needed is a national strategy incorporating offshore connection points. This technology exists. Developers, NG and Government must act now to prevent unspoilt rural areas particularly of Suffolk and Norfolk being criss crossed with cable routes and blighted by vast, unnecessary industrial complexes.
44. In conclusion, Dermot Nolan former head of Ofgem described (The Times 08/10/20 attached) the present method of each windfarm having its own connection as outdated, politically unacceptable, costly and unfit for delivering on the government's renewable targets. He suggests that there should be a full scale review of off shore infrastructure, a fully independent body should replace NG and, instead of hundreds of cables going ashore an off shore grid should be built which would not only save huge areas of our countryside but could save £6 billion by 2050.

J. Further matters

45. Further to my comments on the viewpoints used by SPR I would like to attend the next scheduled Accompanied Site Inspections and would like to invite the inspectors to visit [REDACTED] and view the site from the garden.
46. I would like to speak at ISH2 Onshore siting design and construction 2nd and 3rd December.
47. I have attached the Times article below

Fiona Cramb

[REDACTED]

2.11.2020

Offshore wind blows hole in case for National Grid electricity role

Emily Gosden
Energy Editor

The management of Britain's electricity system should be taken away from National Grid and handed to an independent body with new powers to co-ordinate offshore wind farm connections, according to the former head of the energy regulator.

Dermot Nolan, who led Ofgem until January, said that Britain's renewed push for offshore wind risked politically unacceptable effects because the present system would involve too many unnecessary cables being built to individually connect each project to shore.

A co-ordinated offshore grid needed to be developed and the electricity system operator, owned by National Grid, would be the logical organisation to plan and manage this, he said. Yet this would increase concerns over perceived conflicts of interest with National Grid's other



The increase in offshore wind threatens to produce a tangled web of subsea cables bringing power to land
CERNAN ELIAS/ALAMY

businesses, such as building sub-sea interconnectors, which could link to the offshore grid, and managing the onshore power grid, which will need reinforcing.

"I think it is a good time to go for a fully independent system operator," Mr Nolan said. "I think the perception would be

that in order to build a large grid offshore, and continuing to build the grid onshore, the planner for that system should be independent of the existing network owner and of someone who will be competing to build new network, as well."

National Grid, which manages

power and gas networks in Britain and the United States, has fought to hold on to the electricity system operator, which is responsible for keeping the lights on, managing connections and advising on grid development. However, it became legally separate within the group last year after previous concerns over conflicts of interest.

The government is reviewing whether the operator should be fully independent, with a decision expected soon, and Ofgem has submitted its recommendation. The comments from its former chief executive are likely to bolster expectations that it will have recommended independence.

The government also has launched a review of the offshore transmission network. At present each offshore wind farm has its own connection to shore, but this approach was designed at a time when Britain was expected to have as little as ten gigawatts of offshore wind capacity by 2030. The government is now aiming for 40 gigawatts by 2030, with much more by 2050 to meet net zero targets. Ministers have conceded that the existing system "may not provide

Taxpayers 'should bear cost of preparing for plug-in cars'

The costs of upgrading power networks to cope with electric cars should be paid for through general taxation, the former boss of Ofgem has said (Emily Gosden writes).

Reinforcements to local networks for electric vehicles were likely to "run to billions of pounds every year", Dermot Nolan said. Network costs are paid for through levies on energy bills, a system that he said was "fundamentally regressive" compared with the tax system, which is designed

for wealthier people to pay more.

The former regulator said he was particularly concerned because grid upgrades for electric vehicles were "at least initially more likely to give benefits to people who are well-off, given the cost of electric vehicles.

"You are very likely to see a situation whereby well-off people are essentially being subsidised to some extent by the general populace to take on electric vehicles. I think

taxation would be more progressive."

He said that the Treasury may be reluctant to agree to this at a time that the government was running significant deficits because of Covid-19. If it did not and the costs remained on energy bills, "the government and the regulator will have to find ways to protect vulnerable people", he said.

Ofgem regulates how much monopoly network companies can charge consumers on their

energy bills in return for their investments. The regulator is at loggerheads with national power transmission networks over their spending plans for the next five years.

Local power distribution network companies will go through the process again in two years' time and Mr Nolan said that it was likely to be more contentious because of the much higher sums involved and the costs of readying the network for electric vehicles.

the most efficient approach and could become a major barrier to delivery, given the considerable environmental and local impacts".

Mr Nolan, a consultant at Fingleton, which was founded by John Fingleton, a former chief executive of the Office of Fair Trading, said: "You'll have literally hundreds of cables going onshore, which is driving residents nuts, quite frankly. And you will probably build much, much more transmission link than you need to build." Offshore wind connections were



Dermot Nolan believes Britain needs a fully independent electricity system operator
 OFGEM

already "creating political unrest in areas like Suffolk and Norfolk", he said.

The electricity system opera-

tor has estimated that an integrated offshore grid could save consumers about £6 billion by 2050. Fintan Slye, its director, told *The Times*: "You can reduce the number of cables by potentially up to 50 per cent." He agreed that the operator may be the "obvious" choice to carry out a "network planning type role for the offshore grid", but he disputed that this would require it to be fully independent.

"I think there are conflicts of interest there, but I think that the arrangements that are in place mitigate them," Mr Slye

said. "The electricity system operator has an independent board and decisions are ringfenced from the rest of National Grid group."

Separating the operator would require a new separate IT system and would take away "the financial stability that being part of a FTSE 20 business gives you," he said.

A spokeswoman for National Grid said it would "continue to work closely with the government, regulator and industry to explore what changes will be needed to achieve net zero". ■

