## **Introduction:**

My name is Gary Waple and I live in Snape now; my house is on the A1094 road, which will turn into a gridlocked car park because of increased commercial traffic over a period of a minimum of 12 years, should the Applicant's proposals for substations at Friston proceed.

For the record, I utterly reject the Applicant's proposed plans for the landing of renewable offshore wind energy onshore at Friston, resulting in the unnecessary destruction of virgin coastal countryside. Their proposal denigrates clean energy production into dirty energy delivery.

Also, for the record, I support the UK government's objectives of reducing the UK's carbon footprint through green energy initiatives. Furthermore, I support wind farm energy generation. But we also need to ensure that we deliver green energy properly.

I also commend previous oral submissions that have expressed disappointment at the holding of the oral submission hearings virtually instead of waiting until live meetings could have been held in due course, especially given the BEIS Review that might overtake this process anyway.

I also do not think that those unable, or unwilling, to appear virtually or to comment in writing online, are being reached as they will not be aware of PINS examiners' plans to date. They won't be listening in to scheduled submissions, for example. I shall be submitting my comments both orally and by written submission.

## Submission summary (submission being >1,500 words):

- 1. My submission wholeheartedly supports green energy from offshore wind farm energy sources, but I say: Yes, to Offshore Wind Energy, Let's Do It Right.
- 2. The Applicant's proposals to damage irreparably an area of outstanding natural beauty is completely unacceptable.
- 3. This proposed damage denigrates the green credentials of the offshore wind farm energy generation and taints the whole project as 'dirty' energy, as whenever end-to-end processes are not significantly green from start to finish of a process, the green credentials of the whole project must fail.
- 4. The DCO process robs the inhabitants of the proposed substation location of their peaceable enjoyment of their property, land and surrounding countryside unnecessarily, when alternative brownfield sites are more relevantly available and should be selected in priority.
- 5. The Applicant has not demonstrated knowledge of modern thinking to address the best way of connection of offshore generated energy onshore to the national grid. The Applicant's proposals are therefore unworthy of further consideration.
- 6. My dismissal of the Applicant's proposals are supported by, and influenced by, my MP's oral submission, that of Dr Thérèse Coffey, also the Secretary of State for Work and Pensions, who has concluded (and I quote): 'the impact of this proposal on the countryside, vital habitats, heritage assets, the amenities of local residents and tourism means I that I formally object to these DCO applications and I urge the Planning Inspectorate not to recommend them to the Secretary of State'.
- 7. The lack of impartiality from National Grid, a listed power company, and its connivance to wrap its own substation requirements within SPR's DCO is both devious and

- vexatious. There is a real and present danger of a huge deception on the British people that should not be allowed under any circumstances.
- 8. The likely rippling effects from the time substations are proposed until final completion and then onwards during their operational lifetime will bring about adverse ecological, economic and anthropological effects for untold numbers of years to come, which could have easily been avoided if the Applicant had heeded Dr Coffey's advice (and I quote): 'Throughout the consultation stages, I have suggested alternatives to Scottish Power Renewables, including the proposed nuclear brownfield site at Bradwell, which would have meant less onshore cabling and substations in a more appropriate location. SPR have chosen not to pursue that, which in my view would have made their applications acceptable and are instead proposing a 32-metre wide cabling corridor across 9km of sensitive landscape with large substations on the edge of Friston village, without adequate landscaping'.
- 9. The Applicant's proposals must fail any sensible test of what is disallowable when all are convinced of a perfectly acceptable alternative solution that would not spoil the British countryside irreparably. This has been endorsed by the area's MP, who is also a senior UK Government Minister of State.

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## **Submission:**

The area of Britain where the substations are planned for supporting wind energy farms located in the North Sea off the Suffolk coast contains many things to many people, but I suspect all are united in their appreciation of a precious piece of natural and largely unspoilt coastal countryside, barely two hours from London, that has permitted many to have family holidays without having to fly overseas, access to unspoilt countryside, time with family at the seaside, fish and chips on the beach, without the 8 hour trawl to other competing locations by car, such as North Cornwall or the Lake District. That has certainly been its attraction for me.

Unusually, for a seaside location, this area also provides more than enough satisfaction for those seeking world class concert music performances at Snape Maltings, literary & documentary festivals in Aldeburgh, as well as local food & craft shows.

Beethoven summed up why many people enjoy coming to the countryside when he called the 1st movement of his 6th symphony, the Pastoral Symphony, 'Awakening of cheerful feelings on arrival in the countryside'. I don't think anyone has put this better. Nor has anyone done more to threaten these feelings than the Applicant, through their proposed destruction of virgin countryside. The degree of devastation that the substations will wreck on this coastal country side is well described by many previous submissions but nothing shows this more powerfully than the pictorial representation that SASES have produced:



Existing vista across ancient and unspoilt pathways at Friston



The scale and legacy of the Applicant's proposals for substations near Friston

What a ghastly legacy to see how the beauty of the first vista is so utterly destroyed and spoilt by the concrete wasteland depicted by the second.

The inability of a green energy policy to link all elements in the chain from end-to-end, in other words, from electricity generation to distribution onto the electricity grid, denigrates the overall green credentials of any undertaking. No significant part of the process can be allowed to be undertaken unless in a 'green' way. This also demonstrates a palpable lack of intelligent thinking, where the rush to establish a metric of kilowatt hours delivered from non-fossil fuels is somehow acceptably detached from its delivery to the country's grid system. But this is not

acceptable. This is a failure of national governance and, potentially, a success for stupid thinking.

Threats to ordinary people's quiet enjoyment of their homes, threats to their tranquillity and peace of mind, to the very peace and quiet of the countryside, a place where Beethoven's 'cheerful feelings could awaken', are completely unacceptable and normally you might have expected that these rights would be protected at least by civil law, but through the DCO process, it appears that the Applicant enjoys a status somehow above the law, as it does not expect to have to reward society with the obligation to continue to enjoy these rights. This is not acceptable.

We have heard from numerous respondents at virtual hearings of the anguish that the outmoded processes that the Applicant seeks to enact on those living in and around coastal communities will bring to those caught in its path. If this was a logical path that no other route could possibly deliver, I suspect that those caught up in this ghastly mess might accede to the benefits for the greater good, especially if they were compensated properly. But this is not the case, as many respondents have argued forcefully in their oral submissions and, I suspect, also in their prospective written submissions. There are many alternatives that do not bring irreparable damage to the countryside and all its inhabitants. Inevitably, I believe that the Applicant is more mindful of the needs of its shareholders than the equally important needs of this project's stakeholders.

The problem with traditional measurements of cost/benefit analysis is that applicants often overstate the benefits and understate the costs of pursuing different strategies. For example, the true cost of acquiring the land for 9 kilometres of cable channels the width of the M11 motorway, running from the fragile eco-coast of Thorpeness inland to the mediaeval town of Friston, is more than the acreage acquisition cost. No account is taken properly of the displacement costs, whether those displaced from their previous habitat or the ongoing pollution costs, while the sites are prepared, in terms of disruption, noise and lighting, nor the ongoing societal costs when countryside is lost forever, irreparably. Furthermore, how does one really measure the displacement and ongoing pollution costs for local wildlife – just because they can't complain doesn't make it acceptable.

At the same time, the Applicant's proposed methodology to create its onshore infrastructure is bogged down in old-fashioned thinking that makes a mockery of the UK Government's desire to deliver any world class green energy solutions. Instead, we seem to be drifting down a route that will deliver a laughing stock solution, where the view out to sea will be of modern green energy generation but the view over our shoulder inland will be of decimated countryside, humming 24/7 with the noise and light pollution, akin to something almost medieval. Profit-led solutions rarely produce anything other than profit-led solutions, except that the people and inhabitants of the areas affected will have little to show for this legacy to future generations of people coming to this area, except the prospect of a few pounds saved from electricity bills. This is not what ordinary people want.

As a current resident of coastal Suffolk, and likely to be affected by this deplorable project and approach to green energy solutions, I am deeply disappointed at the myopia of the Applicant's proposals. Similarly, everyone I talk to seems to have the same response. No one baulks at the sight of wind farms out to sea – although I think that's another story. But when you explain how the wind farm electricity will be landed at the fragile eco-coastline near Thorpeness, cabled in huge trenches inland and then uploaded to the grid via proposed substations at Friston, there is widespread incredulity. We are all left wondering how we have ever got ourselves into such a mess. Thankfully, there is still time to salvage this debacle.

Instead of basking in the satisfying glow of being part of a new age of low carbon emissions, our prevailing feeling is one of the neglect of the many individuals involved, neglect of the countryside that will be irreparably damaged, neglect of the natural world and bio-diversity that will be lost to this region, forever. This is not acceptable.

I am a fervent believer in the benefits that technology brings to our world but it seems from these proposals that the Applicant has been left sadly behind. We hear of local people who have researched new ideas and technologies, often retired people, who have come to this area of Britain after a lifetime of work elsewhere, and yet a supposed giant in the technological world of electricity distribution is left behind of this tireless group of individuals and their campaigns: SEAS, SASES, SOS, SEAC. All these groups are represented by people, who feel that they won't be able to enjoy the benefits of living in an area of unspoilt British countryside because their very existence, livelihood, mental welfare and future plans are threatened completely and unnecessarily. They all have better things to be doing with their lives than worrying endlessly about whether their future plans are to be irreparably blighted. Sadly, this is the current situation we all face.

If I take any comfort from these hearings and proceedings, it is that I hear a common message from all commentators that mirrors my own. We don't appear to have proper joined-up thinking for the introduction of non-carbon technology if current proposals for wind power distribution are anything to go by. Other European countries close to us seem to have proper infrastructure planning at a national level, for example, Germany and Denmark, where wind farm companies are regulated to bring their harnessed wind energy onshore at predesignated, single point entry, preferably at brownfield sites. This is the sort of new thinking that seems to have utterly alluded the Applicant.

The wholesale despoliation of the countryside, whereby 9km of countryside will be dug up and scarred irreparably to build cable trenches from the sea at the fragile eco-coastline near Thorpeness beach, inland to the mediaeval village at Friston to engulf more than 100 acres of countryside with a 18m high concrete wasteland that hums 24/7 forever, is a national scandal in the making. It doesn't just affect residents but visitors (why come here?) and tourists (why come here?). Furthermore, it's not as if any jobs will be created for local people from this enterprise and the lasting legacy of this desecration will be an irreparable scar on the landscape, forever.

I have enormous sympathy with an earlier oral submission from Natasha Green (8/10/20), who fears this project will rob her of the opportunity to enjoy the Friston countryside of her youth with her own children, as she did with her parents. I share her fear as I fear that I shall not have the opportunity to spend time with my grandchildren one day, as current areas of outstanding natural beauty are trampled underfoot and disappear forever. As columnist Janice Turner wrote in the Times on 29 October, (and I quote) 'Such stupid vandalism. How can clean energy be so dirty?'

I was enormously gratified that our own MP, Dr Thérèse Coffey, also the Secretary of State for Work and Pensions, made a powerful oral submission on the same date, expressing her deepfelt scepticism concerning the Applicant's plans. Dr Coffey made a strong observation expressing her disquiet about the Applicant's proposed cabling methodology to reach Friston. *I quote again*: 'Throughout the consultation stages, I have suggested alternatives to Scottish Power Renewables, including the proposed nuclear brownfield site at Bradwell, which would have meant less onshore cabling and substations in a more appropriate location. SPR have chosen not to pursue that, which in my view would have made their applications acceptable and are instead proposing a 32-metre wide cabling corridor across 9km of sensitive landscape with large substations on the edge of Friston village, without adequate landscaping'.

It inspires me that a senior minister of the UK government is at odds with the Applicant's proposals. Dr Coffey goes on to point out: the devastating impact on the local environment, likely project sprawl if SF6 is used for cooling, issues with the design of the Friston substations, non-compliance of proposed cabling with the government's National Planning Policy Framework, the proximity of the cabling corridor to residential properties, the effects on coastal tourism. What a catalogue of failure and backward thinking.

Perhaps, more damning is Dr Coffey's conclusion (and I quote): 'the impact of this proposal on the countryside, vital habitats, heritage assets, the amenities of local residents and tourism means that I formally object to these DCO applications and I urge the Planning Inspectorate not to recommend them to the Secretary of State'. I cannot see how it possible to disagree with so important and knowledgeable a commentator.

That's why the SEAS campaigners say: Yes, to Offshore Wind Energy, Let's Do It Right.

As someone likely to be affected by the Applicant's proposals, they seem ill-conceived, simplistically designed and poorly executable, lacking any local knowledge of where their proposals will take them. As if corporate planners in the Applicant's parent company idly drew a line from the North Sea wind farms to land at Thorpeness, and then on to a small village in Suffolk, Friston, where they probably thought they'd meet little resistance. And that of course is where they have misjudged things, as opposition to the Applicant's proposals has, if anything, fired up residents, visitors, businesses, holiday-makers, local artists, the young and the old, those still working and those retired, and galvanised their resolve to object to the Applicant's proposals with even greater resolve — all have come together to express their incredulity and disappointment that an enviable desire to seek green credentials along this coast should be so disastrously mismanaged. As Janice Turner wrote further in her Times article: (and I quote) 'Suffolk has a tireless army of retired barristers, engineers, civil servants, artists and spies who care about every pebble on the beach'. Now that shows insight and local knowledge.

It is hardly surprising that there is such widespread disappointment with the Applicant's proposals: there is seemingly no Master Plan in the UK for emerging technologies to be incorporated into such projects; other countries do this, but for some reason, we don't. National Grid cannot be relied upon as an impartial operator, as it is no longer a government-owned operator so the electricity operator for England is actually now a listed company with corporate shareholders and executives, who probably care little whether or not its operations benefit this nation's stakeholders, British residents.

At the same time, it is disturbing that the DCO process seems to allow National Grid to wrap its proposed substations requirements into the Applicant's DCO leaving us to sleepwalk into a much wider commitment to countryside destruction than immediately obvious at first viewing. How is it possible that this can be allowed? Surely, National Grid should have been the Applicant with SPR bundled into the small-print than as currently drafted. The Applicant's proposals are for this reason alone vexatious and should be set aside as failing to describe properly what the real process is and its real implications for coastal Suffolk over the life of these proposals.

As coastal Suffolk's MP concluded, SPR should have considered a brownfield site, such as at Bradwell. This recommendation has been further endorsed by a recent decision by Colchester Council to reject unanimously a proposal to develop the decommissioned Bradwell power station brownfield site for a further nuclear power plant as they (and I quote) 'prefer a focus on renewable energy alternatives.' The case therefore for bringing wind farm energy onshore at a brownfield site, such as nearby Bradwell, seems far more compelling than the Applicant's

proposal with National Grid in cahoots to destroy hundreds of acres of greenfield countryside near Friston, all unnecessarily, when a real alternative, an existing brownfield site, already exits.

Coastal Suffolk depends heavily on tourism, so it is further distressing to read in a report by the Suffolk Coast Destination Management Organisation (DMO) on the forecast effects that energy proposals would have on regional tourism. A conservative evaluation according to the DMO Energy Coast report of the potential loss caused by the cumulative impact of energy projects could be £40m per annum. Local businesses may never recover. Declining offers to prospective visitors and tourists presage a slow death of this area, which is why the prospects for the Applicant's proposals have such far-reaching consequences beyond the initial substation sites. The contamination from this project will ripple outwards around the whole of coastal Suffolk over time. That is why the devastating proposals for this project must be changed.

## **Conclusion:**

I shall end near where I began. It should be possible for us to preserve 'our awakening of cheerful feelings on arrival in the countryside' but not if the Applicant's proposals are taken forward in their current form. My hope is that the BEIS Review will come to the same conclusion anyway, provided this Review is chaired and conducted independently and properly, and not a window-dressing exercise for inactivity.

I have spoken to no one who has much bad to say about prospective UK plans for offshore windfarm energy generation but I've spoken to no one who has anything good to say about the Applicant's proposals for landing this energy onshore, at the cost of hundreds of acres of virgin countryside, lost forever. The UK's green credentials from wind farm energy in the North Sea would be forever tainted as 'dirty' if the Applicant's proposals, as drafted, are adopted.

For these reasons, I recommend to the PINS inspectors that the Applicant's proposals be rejected and that the Applicant be required to return with alternative proposals that include the landing of offshore wind energy to a brownfield site, better suited to this task. The wanton destruction of British countryside should never be an option. This is stupid thinking.

Finally, on a personal note, PINS inspectors warned us that oral submissions should not be 'vexatious or frivolous' and I hope that I have abided by these requirements in my written submission. This warning made me pause to re-read the Oxford dictionary definition of 'vexatious', which I have found to mean, *and I quote* 'Causing or tending to cause annoyance, frustration, or worry'.

I suggest that 'annoyance, frustration or worry' represent precisely the sentiments that all oral submissions have expressed throughout these hearings in consideration of the Applicant's proposals.

Thank you.

**Gary Waple FCA MBA** 

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