

**From:** [REDACTED]  
**To:** [East Anglia ONE North](#)  
**Subject:** EA1 20023661 EA2 20023663 S Fulford Representation 02 November 2020  
**Date:** 02 November 2020 12:10:38  
**Attachments:** [SPR Open Floor hearing transcript S Fulford EA1 200236613.pdf](#)  
[S Fulford EA 12 20023661 DM land plans reference.pdf](#)  
[S Fulford EA1 20023661 Savills Letter Jan 2018.pdf](#)  
[S Fulford EA1 20023661 letter from Dr Therese Coffey MP 2018.pdf](#)  
[S Fulford EA 1 20023661 Sizewell sound recording of sample substation.m4a](#)  
[Final representation EA12 S Fulford EA1 20023661 EA2 20023663 .pdf](#)

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Dear Sir

Please find a two written documents:

A final representation.

A transcript of an Open Floor hearing that was not completed due to technical difficulties.

A series of jpeg photographs of SPR site selection.

A sound recording (Mpeg) of a substation at Sizewell.

A letter from T Coffet MP

A Letter from Savills Land Agent 2018

Thank you

S N Fulford

EA1 20023661

EA2 20023663









31 October 2020 S N Fulford [REDACTED]

Final representation to the National Inspectorate re EA1 And EA2

EA1 200 23661

EA2 20023663

I attach a transcript of the full text I intended to deliver via the Open floor hearings but failed to complete due to inexperience in delivering a timed deposition under extraordinary circumstances.

Further to the attached script I would like to endorse all of the objections you have now heard via direct personal representations during the open floor hearings and those still to come.

In particular, I recommend to you the detailed work that has been presented by SASES and SEAS. The depth of work detailed is of a high quality and compelling which is in stark contrast with the inadequate work presented by the applicant.

I am attaching a series of photographs to add texture and background to the many elements regarding Friston village in particular.

There are three photographs of flood water from last year which are typical, not extraordinary events. I can assure you that in years of heavy snow fall etc these are mild examples.

There are three typical vistas of the actual site which will all be lost forever. A site visit by either the applicant or the members of the Inspectorate team can only graze the reality of the site chosen regarding its importance to the village of Friston. This site is the essence of Friston Village, not just land next to it. It is the only amenity available to the residents to walk and enjoy views of the village and its heritage. A rerouted footpath around the planned substation is offensive in its uselessness given the visual horror not to mention the level of noise pollution intended.

I attach one picture of the pitiful mitigation planting at the Galloper substation site near Sizewell. You may draw your own conclusions regarding claims for mitigation.

I attach a letter from Dr T Coffey MP (cabinet member) illustrating the level of concern two years ago.

I attach a letter from the first land agents Savills Jan 2018 to illustrate the expectation of the applicant to be in the Sizewell/Leiston area (page 2 asterisk) Re site selection.

I also attach a sound recording of a small substation next to the Galloper site at Sizewell. You will hear a hum/buzz with a spoken description from me in a normal spoken voice.

The point of this sound bite is to illustrate the sheer horror of what the applicant intends to inflict on Friston.

The scale of the three separate installations, which are expected to substantially expand in the future, dwarf the substation recorded which will make the environment in Friston untenable for residents and wildlife. I refer you to:

[https://www.euro.who.int/\\_data/assets/pdf\\_file/0017/43316/E92845.pdf](https://www.euro.who.int/_data/assets/pdf_file/0017/43316/E92845.pdf)

Noise pollution is so often dismissed as subjective or too hard to quantify as to what is harmful to the environment whether it be the well being of people or the wildlife we share this world with. The extraordinary silence at night in Friston will be it's undoing if this project proceeds.

It has become clear that a preference by some groups or lobbyists for a lower profile in the development visually is more important than noise pollution , therefore, the attenuation in higher buildings as originally intended has been abandoned.

Air cooled installations are clearly cheaper for the applicant too but at what cost to Friston.

If I have left any doubt a summation regarding noise pollution would be that for a minimum of three years there will be forms of noise day and night, seven days a week. At times this will be unendurable at 350m away which is where the village begins. For those that live through this experience which may well last between six and ten years in reality there will be a legacy of a hum or buzz which will not vary or deplete. There is, therefore, no light at the end of the tunnel when all the work is done. Just a perpetual dread of what is to come when this vast site becomes operational. I refer you to the WHO (above) regarding continuous tonal noise without mitigation of background noise.

Questions that I find unanswered include:

Why is the existing Galloper substation located where it is?

Why is it surrounded by a vast earth works or Bund? Is it to mitigate visual impact or is it a safety feature? Why is there nothing to compare it in the Friston development?

What are the safety implications for Friston?

What are the safety and security implications for the pylon network that link the Sizewell nuclear plants to the National Grid with such a large site in Friston?

How is it possible that NGV and NG have side stepped the planning process when the future developments of the Eurolink and Nautilus projects in particular are wholly dependent on an application made by SPR? Not to mention further, undeclared as yet, expansions.

Why is a cable route being dug in parallel to the National Grid Pylons away from the source of the energy through unspoilt woodlands and communities when it could be located between an industrial park and a vast Nuclear complex on land that in living memory was farmland? Not very "Green"

Why is noise pollution not being given more weight?

Why is light pollution both during works (years) and long term not being properly addressed?

Felixstowe docks and Sizewell pollute what is otherwise a dark sky environment. This will be lost.

Where does the applicant intend to site vast arrays of batteries as yet undeclared?

There is clearly no benchmark to compare this application with since the sheer scale of it sets it apart from anything that has gone before regarding substations and their particular challenges to the environment yet definitions in planning law seem to apply such as "No Impact" and "Negligible" etc when they can hardly be applicable or proven.

This application has already changed the lives of hundreds if not thousands of people so far as evidenced by the number of objections received, the obvious distress seen and heard in the Open Hearings witnessed so far. It would be fair to assume that there are many many objectors who failed to raise their concerns for a variety of reasons.

The consultation process carried out by SPR has failed to alert the wider population as to the true extent of this development. Whilst SPR can hardly be blamed for not mentioning the expansion plans of The National Grid companies but actively concealing them in their visualisations presented to the public in my view makes them complicit in the process of concealment. I refer you to my point that although opposition is considerable it may well have been far greater had all the known intentions been made clear from the outset. The public are, generally speaking, totally unaware of the extraordinary extent this small area is going to be changed forever.

Perhaps frivolous but important remarks that have found their way from the applicant and their representatives into the public domain in consultation hearings and site visits.

### **2018/19 SPR Public consultations and presentations in Friston Village Hall**

#### **Quotes**

*The search area beyond Leiston/Sizewell is a box ticking exercise.*

*The woodland at Aldringham Court will not be cut down.*

*We will never cross four roads because of cost and disruption.*

*Grove Wood will screen the site from the AONB!*

*I guarantee that there will be no implications regarding noise from this site.*

*You will need double glazing.*

*Don't worry, we can make it look like a Suffolk barn...what colour should we paint it!*

*This is an easier application in Friston than in the AONB at Sizewell.*

The site selection process needs to be carefully examined starting with questions of how in 2017 the original scoping report made by the National Inspectorate was so easily put aside and replaced with an arbitrary search area that made no sense at all except that it potentially moved the site just beyond the AONB. It did not include sensible access such as the A12 for instance. There seems no limit to the length cable routes can run. (Bramford and Necton)

The applicants have found themselves with a wholly unsuitable site without merit of transport links or any other favourable elements, indeed it is wholly unfavourable due to risk of flooding, lack of space, lack of security and safety.

A disaster for a rural village.

A disaster for the many communities along the cable route chosen.

A tragedy for all the environmental damage including the removal of over a thousand trees that amounts to hundreds of years of ecology. Gone.

I would like to add at this point that Friston House (Grade 11 listing) prior to the site having been chosen has never been visited and still the applicant chooses to ignore the profound detrimental effect it will have on whoever finds themselves as custodians of this property.

There is no mitigation to the West of the site at all at this point either visually or more importantly regarding noise pollution. Indeed, the applicant is actively attempting to remove Friston House as a



recognised receptor and therefore absolving the present applicant from any responsibility should the noise from these substations not be mitigated adequately. Future expansions of this site will almost certainly complicate the issue of noise emissions.

I refer you to the flippant unguarded remark re double glazing and remarks found in the WHO document re the right or expectation to have a window open for reasons of health and well being.

I am confident it will not escape the Inspectorates remit that all of this is intended in conjunction with Sizewell C which is expected to be given the green light and become one of the largest building sites in Europe. (BBC headline 25th Oct 2020)

All the while the Sizewell C project has been present as government policy, and endorsed by local government and the sitting MP, and therefore, to even consider this region as available for such further development has been inappropriate from the offset which is why SPR connected to Bramford via a 15km cable route previously. An abject failure considering the sheer scale of that project in delivering so little.

By contrast, the list of objectors and objections to this application from it's inception have been numerous and extraordinary in their range and yet the applicants continue to pursue it. SPR acknowledge that a review is appropriate for future developments but insist the Friston project must proceed until there is a change in planning law and that Government ambitions and targets for renewables trump all the valid reasons why Friston will not be able to cope with this development. This is frankly absurd and irresponsible. Climate change is a global issue not political, nor is it an opportunity for private firms to capitalise on opportunities. Whether EA1 and 2 proceed is completely irrelevant to the afore mentioned issues. It would be disingenuous to say otherwise. The outcome of the woodlands at Aldringham court or the destruction of a rural habitat in Friston has ramifications for all, now and into the distant future because this will be the latest benchmark laid down for privately owned companies to follow in the future.

Like many many hundreds of other concerned citizens, I object without reservation to this application and to the fashion in which it has been put upon East Suffolk.

S N Fulford



Friston



SPR – 7 minute talk.

Good afternoon

My name is Mr Simon Fulford and I am speaking to you on behalf of myself and my wife - I have had an association with Suffolk since 1958 and a direct connection in particular with [REDACTED] and Friston since 1979. It is where we live.– a grade II listed building.

We have both listened to the representations made previously on the 7th October and earlier today which have covered in great detail many of the issues we endorse wholeheartedly. I think it is extraordinary the depth of enquiry and rigour with which members of the public have looked at this application on every front. By contrast, the total lack of detailed and area specific investigation by the applicant is glaring. The word “mitigation” appears over and over again yet the proposed destruction of countryside and all that implies is irreversible. These are assets that will not be replaced or recover.

I would now like to speak briefly on the specifics regarding Friston village and Friston House in particular.

The points I would like to make are as follows:

- 1 Impact of Noise pollution on Friston house and Friston residents.
- 2 The future expansion of this site to accommodate more infrastructure.
- 3 Behaviour of the applicant towards Stakeholders in Friston and it's residents.

The location of Friston house is situated on the opposite side of the valley to the West of the proposed substation sites, both of which are elevated - The property is directly exposed in respect of: noise, and light pollution. –

The applicant's present plans of mitigation for both noise and visual impact are zero to the west of this site other than long grasses.

Noise pollution is widely ignored and undervalued in society regarding its harmful effects on the general environment and the well being of populations that it affects

Possibly because unlike visual impacts unless directly experienced it is of little concern. The noise in Friston will have no bearing on people in Aldeburgh for instance. And in the same vain, I expect you will hear very few representations regarding the noise pollution experienced in the North Sea because the environment out there has few voices to represent it. I hope I am wrong about that for it is no secret that wind farms are anything but quiet. We are responsible for the few wildernesses that still exist yet the UK is feverishly gobbling up the North Sea as some kind of free for all! The light pollution out there is a whole other issue which in my view is a tragedy and as I mentioned just now I sincerely hope that marine preservation groups address this.

Regarding noise onshore, I have attempted to digest as a lay person the extensive tomes of information on this subject published by the World health Organisation. Or WHO.

The WHO documents deal with global issues and although it recognises the differences in noise sources and in particular continuous noise, it inevitably doesn't address specific issues such as substations and the noise that they emit in close proximity to habitation. It tackles the larger issues of Air, Road and Rail noise for instance at length. It will be shown in detail in other representations during this hearing that the Valley at Friston is exceptionally and extraordinarily quiet at **night** in particular - and for that reason the levels of sound proposed by the applicant will be very apparent and life changing for those who live in the vicinity.

The very fact that there is such an extraordinary level of quiet at night in Friston simply exasperates this site selection. Does it matter? Far beyond the annoyance to human habitation it is a precious and fragile environmental asset of this region which will be lost indefinitely.

Over the course of many months of so called consultation the representatives of this applicant publicly insisted that noise would not be an issue for the residents of Friston

Yet in an unguarded moment we were rather flippantly advised that we will require double glazing! Not only is that not possible at Friston

House it misunderstands a simple concept that as recognised by the WHO

a window open at night is a reasonable expectation for well being and health or even just a good nights sleep. At present the applicant is applying to emit a level of noise barely below the maximum allowed in an urban setting where other mitigating noise inevitably masks individual emissions of continuous noise pollution.

Indeed, the WHO recognises that there are instances where locations of extreme quiet serve only to complicate a developers duty of care to the environment in question since the presence of silence highlights rather than mitigates the nuisance proposed.

It is my understanding that the applicant intends to recognise only two of the five nearest receptors to the site regarding noise pollution or nuisance to the extent that it is actively applying to exclude others. Friston house will therefore be excluded although the proximity of the house to the site varies by only a matter of metres!

## 2 Future expansion

Beyond the immediate concern of the noise pollution directly upon the house, both the curtilage of the house and the village of Friston will also

be detrimentally affected by the noise of the extraordinary long construction periods involved. The environment of the village and surrounding homes are carefully maintained as befits village life. That includes the great lengths and efforts made in maintaining the grade 2 star Church.

One's appetite for outdoor life in Friston will be impaired and therefore the activity that make it a successful village will suffer.

It can hardly escape the inspectorates attention that the sheer size of this project both now and into the future is vast. The final footprint of 32 acres by this applicant is an extraordinary underestimate of the land changed by this project and those that follow.

The construction site and periphery land required is the entire valley after all.

It is my opinion that it is unreasonable to examine this application and even unfair without the full extent of the intent of The National Grid to be laid bare at this time.



I understand that the Inspectorate will look at this element of the application and we all look forward to witnessing and hearing the outcome of these enquiries.

3

My last point is as to the behaviour of the applicants towards the residents specifically in Friston.

Over a considerable length of time we have communally discovered the meaning of terms such as RAG assessments, Rochdale envelopes, and worse still. What it means to be scoped out!

It is no fun to be told that the woodland known as Grove wood is the main reason for this site selection in order to screen the project from the precious countryside to the East. That only exasperates the horror the village expects to experience on the west side of said woodland. The “Mitigation” proposals of tress if successful are long term and offer no comfort at all. Those that live long enough to see them will have literally witnessed a passage of time that reflects the passing of their lives.

Regarding the so called stakeholders, early on in this process the applicant indicated that approx 6 acres of **our** property would be required. During the many months of uncertainty of what that meant,... the need for our 6 acres has been withdrawn as the applicant publicly claimed that in response to their public consultations they would reduce all of their sites. Perhaps there is more of that to come in the coming months.

And finally, being referred to as NIMBY's when the strength of feeling expressed against this application in 2018 reached it's zenith was simply insulting.

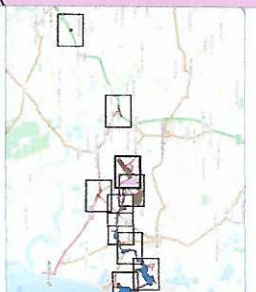
There is clearly no "MY" in backyard. Whatever land resources are required to facilitate this application, they are either acquired by negotiation privately or by CPO. It is not an endorsement of this application as often claimed by the applicant when a stakeholder accepts terms. It is inevitable that a stakeholder will settle on the most favourable terms.

This is an extraordinary proposal for this small village. We have all been living with this threat for two years which has adversely affected our lives and we must now endure a further extended wait to understand our fate.

I have no idea what the future holds for Friston in the event that this all comes to pass. In the event that this does happen, the idea that it will either have “No” or “Negligible” impact on the village as the applicant claims in writing must surely be removed from record!

- Key:**
- Order Limits
  - Land Subject to Temporary Occupation and Use and Freehold Acquisition
  - 64, 69, 89, 105, 106, 107, 108, 109, 110, 111, 113, 114, 127, 128, 129, 130, 131, 133, 135
  - Land Subject to Temporary Occupation and Use and Acquisition of Permanent Rights
  - 82, 88, 97, 100, 101, 102, 103, 104, 115
  - Land Subject to Temporary Occupation and Use
  - 90, 91, 116, 117, 117A, 118, 119, 120, 121, 122, 122A, 123, 124, 125, 126, 132

ABPP Ref: 4(2)(i)  
PINS Document Reference: 2.2



Coordinate System: British National Grid  
Projection: Transverse Mercator  
Datum: OSGB 1936

**Location:**  
Land to the north and west of Friston, Suffolk.

**Coords:** 640 636 280 931

**Project Name:**  
East Anglia ONE North Offshore Wind Farm

**Drawing Name:**  
Land Plans

**Drawing No:** 160476\_PLN\_DOC\_1820\_10

**Rev**    **Date**    **Description**

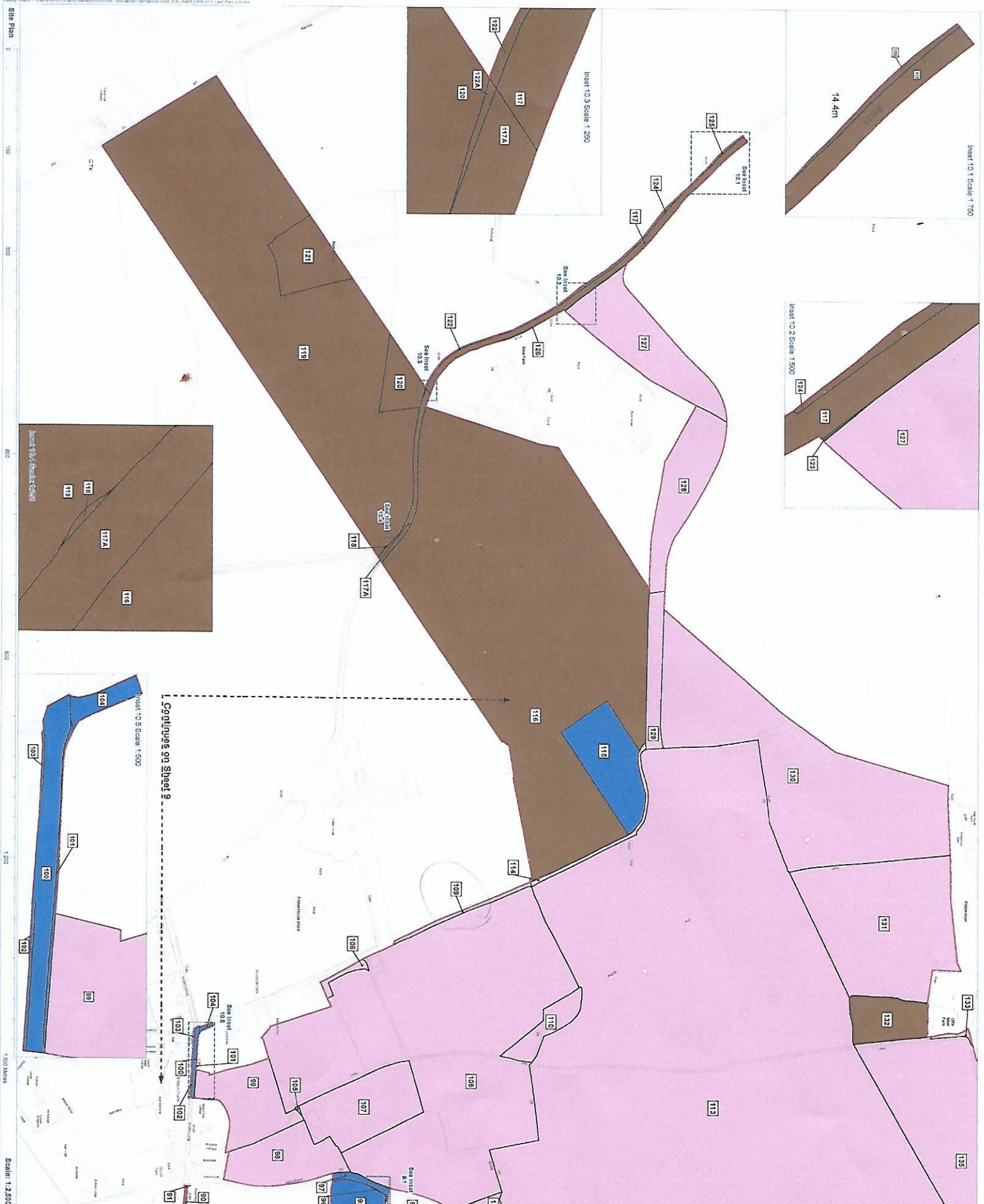
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**Drawn:** PR  
**Approved:** HH  
**Sheet No:** 10 of 13  
**Sheet Size:** A1



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## DR THERESE COFFEY MP

*Member of Parliament for Suffolk Coastal*

House of Commons, London SW1A 0AA

020 7219 7164

therese.coffey.mp@parliament.uk

Mr and Mrs Simon Fulford  
Friston House  
Saxmundham Road  
Friston  
Suffolk IP17 1NJ

28 June 2018

Dear Mr and Mrs Fulford,

I understand the concern people in Friston and nearby have expressed regarding the proposal by Scottish Power Renewables (SPR) for their substation (and the associated National Grid block) to be located near the village. This concern is exacerbated by the knowledge that National Grid is also considering the connection at Sizewell of two interconnectors, which would require further infrastructure.

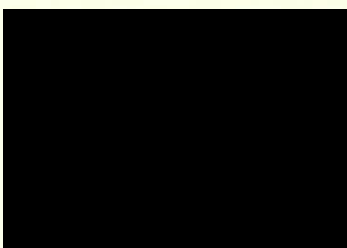
I had met SPR earlier this year to discuss their proposals and had already said, regardless of where they intended to put the substations, that they needed to be smaller and, if necessary, built into the land (as had happened with an earlier substation for another windfarm). I attended the public consultation on the initial considerations several months ago after meeting the company. At that point, I reiterated my view that while recognising that the connection at Sizewell had already received consent, that the proposed nature and size of the required buildings was unacceptable.

I have also considered this with councillors and officials at a local council meeting. I raised this again at the Suffolk Coast Energy Delivery Board meeting at which senior officials from BEIS (Business, Energy and Industrial Strategy) were present. I followed this up with a short meeting with the Secretary of State for Energy, Greg Clark, at which I reiterated my concerns on the overall impact on this area of inappropriate infrastructure.

I have now secured a meeting with the Energy Minister, Claire Perry, in July at which I will represent the concerns of local residents. I will be joined by local councillors and officers from the district and county councils.

I want to assure you that I will be pressing hard for a change to what SPR has proposed.

Yours sincerely,



Nicola Suzanne Fulford

22 January 2018

Reference: SK346948

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Dear Nicola Suzanne Fulford

### **SCOTTISHPOWER RENEWABLES – EAST ANGLIA ONE NORTH AND EAST ANGLIA TWO**

We are writing to you on behalf of ScottishPower Renewables (SPR) regarding the East Anglia ONE North and East Anglia TWO projects. Savills have been appointed as land agents to support SPR on these projects and will be the first point of contact for individuals or companies with an interest in land or property in the area.

You should previously have had correspondence from us, which explained that SPR are taking forward the development, construction and operation of four offshore windfarm projects off the coast of East Anglia. We are particularly keen to consult with you with regard to East Anglia ONE North and East Anglia TWO which are both in the early stages of development.

With this in mind, the projects held some informal Public Information Days in late October/early November 2017. The next round of Public Information Days are planned for March 2018 and details are provided below:

Area	Venue	Date	Time
Lowestoft	Victoria Hotel	17 March 2018	10am – 1pm
Southwold	TBC	17 March 2018	3pm – 6pm
Leiston	United Church	18 March 2018	10am – 1pm
Thorpeness	Thorpeness Country Club	24 March 2018	10am – 1pm
Aldeburgh	TBC	24 March 2018	3pm – 6pm
Orford	Town Hall	25 March 2018	10am – 1pm


We would encourage you to attend these Public Information Days. There will be representatives from SPR and they will provide current information regarding the projects.

SPR proposes to submit separate applications for development consent for East Anglia TWO and East Anglia ONE North in 2019 and 2020 respectively. In advance of submitting these applications detailed Environmental Impact Assessments (EIAs) will be undertaken. The first step in these EIAs is to define the scope of the assessment. The projects recently submitted Scoping Reports to the Secretary of State. They effectively set out what the projects plan to do between now and submitting a full development consent application in 2019 for East Anglia TWO with East Anglia One North submitting its application later in 2020. The Secretary of State and other stakeholders review this document and provide feedback as to whether they agree with the proposed approach or consider that additional steps or work is required.

SPR would like to share the Scoping Reports with you. The Scoping Reports contain plans identifying the search area which the projects are currently studying. They are available to view or download from the following weblinks:

- East Anglia Two  
(<https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-two-offshore-windfarm/?ipcsection=docs>)
- East Anglia ONE North (<https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-one-north-offshore-windfarm/?ipcsection=docs>)

The projects also wish to consult with local residents and landowners such as yourselves at this stage to give you the chance to provide feedback or ask any questions you may have. There will also be further informal and formal consultation prior to the applications being submitted. At this stage there are no set deadlines for consultation or responses from local residents or landowners.



Whilst the East Anglia ONE North and East Anglia TWO projects are at an early stage of development, it is not yet known precisely where the onshore connection to the National Grid will be made. Furthermore, the cable route and locations for the substations, which will be required for these particular projects, have not yet been defined. It is, however, anticipated that these projects will connect to the grid in the vicinity of Sizewell or Leiston.

SPR has been undertaking some initial research in the area which has indicated that you may own land or property in our wide search area. Please note that although land or property which you may own has been identified within our search area, this does not mean you will be directly affected by the projects. It does mean that we are interested to hear any feedback or answer questions you might have. Over the next year SPR will look to reduce the search area to form a proposed route for the cable route and substation locations. Local residents and individuals with an interest in land and property will continue to be consulted with. The projects will look to avoid residential areas and houses.

The projects will also undertake some initial site surveys to identify potentially sensitive species and habitats and generally to understand the area better. These will help with the design of the projects and to identify ways of minimising the impact. Access will not be required everywhere but should the projects think that it would be beneficial to undertake surveys on property owned by you, we will contact you to ask whether you would be willing to agree to this.

Should you have any queries or comments that you would like to discuss prior to the Public Information Days in March, please do not hesitate to contact me at [eastanglia@savillsprojects.com](mailto:eastanglia@savillsprojects.com) or by ringing 0845 149 1415. You can also find further information about the two projects on the following links that I hope you find helpful;

[https://www.scottishpowerrenewables.com/pages/east\\_anglia\\_one\\_north.aspx](https://www.scottishpowerrenewables.com/pages/east_anglia_one_north.aspx)  
[https://www.scottishpowerrenewables.com/pages/east\\_anglia\\_two.aspx](https://www.scottishpowerrenewables.com/pages/east_anglia_two.aspx)

Kind regards

Kimberley Lumbis  
Consultant  
Savills Strategic Projects