

**SCOTTISHPOWER
RENEWABLES**

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on Friston Parochial Church Council Deadline 11 Submissions

Applicant: East Anglia TWO and East Anglia ONE North Limited
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Applicable to East Anglia ONE North and East Anglia TWO



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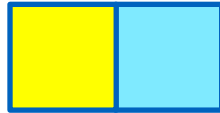
Glossary of Acronyms

BEIS	Department for Business, Energy and Infrastructure Strategy
DCO	Development Consent Order
ESC	East Suffolk Council
ExA	Examination Authority
FPCC	Friston Parochial Church Council
ISH	Issue Specific Hearing
LVIA	Landscape and Visual Impact Assessment
MoU	Memorandum of Understanding
NGESO	National Grid Electricity Systems Operator
NGV	National Grid Ventures
PD	Procedural Decision
SASES	Substation Action Save East Suffolk
SCC	Suffolk County Council
SEAS	Suffolk Energy Action Solutions
SPR	ScottishPower Renewables
SuDS	Sustainable Drainage System



Glossary of Terminology

Applicant	East Anglia TWO Limited / East Anglia ONE North Limited
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
European site	Sites designated for nature conservation under the Habitats Directive and Birds Directive, as defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017 and regulation 18 of the Conservation of Offshore Marine Habitats and Species Regulations 2017. These include candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas.
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order but will be National Grid owned assets.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.




1 Introduction

1. This document presents the Applicants' comments on Friston Parochial Church Council's (FPCC) Deadline 11 submissions – Post Hearing Submissions including Written Submissions of Oral Case (REP11-144).
2. This document is applicable to both the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's (ExA's) procedural decisions on document management of 23rd December 2019 (PD-004). Whilst this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it for the other project submission.



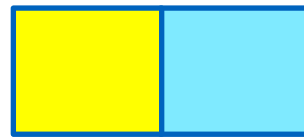
2 Comments on Friston Parochial Church Council's Submissions

2.1 Applicants' Comments on Friston Parochial Church Council's Post Hearing Submissions Including Written Submissions of Oral Case (REP11-144).

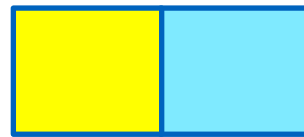
ID	FPCC's Comment	Applicants' Comments
1	 <p>Aerial photograph of the proposed SPR/National Grid site at Friston. 21 May 2021.</p> <p>Loss and destruction as SPR undertake investigating groundworks less than five minutes' walk from the village.</p> <p>Is this our legacy for future generations?</p>	<p>The Applicants refer to <i>Applicants' Statement regarding Ground Investigation Works</i> (REP10-029) submitted at Deadline 10 which sets out why these surveys are being undertaken. The Applicants disagree with the comment regarding 'loss and destruction' and would note the land in the picture is intensively farmed agricultural land.</p>
1 Introduction		
2	<p>Throughout this Examination we have concentrated on social and economic issues in so far as they relate to the care, health and</p>	<p>No comment required.</p>



ID	FPCC's Comment	Applicants' Comments
	<p>wellbeing of our community as befits our church. We have been indebted to the work of SASES.org.uk on behalf of Friston Parish Council for their detailed and comprehensive technical and legal inputs supported by a team of experts in particular disciplines.</p> <p>Similarly, we are indebted to the work of SEAS who have provided invaluable inputs over a huge range of issues.</p> <p>We continue to support the representations that both organisations have made. We have drawn heavily on their work and sought to complement that in our own research, especially emerging policy issues and initiatives highlighting the need for more strategic and coordinated planning,</p> <p>We make little apology if we are perceived to be covering 'old ground'. But at this late extended stage of the Examination our community harbours considerable concerns and do not think that we are being 'listened to'. That these are not being taken seriously and are insufficiently addressed by the Applicants and also by our local authorities – Suffolk County Council (SCC) and East Suffolk Council (ESC) – as statutory consultees and discharging authorities.</p> <p>These concerns were borne out by what we considered to be inadequacies in the Issue Specific Hearing 16 (ISH 16) on Wednesday 26 May 2021.</p> <p>We live here and our lives matter.</p>	
2 Summary		
3	Outstanding issues and concerns:	The Applicants have responded in detail to each of FPCC's items in the relevant proceeding rows of this table. The Applicants would note that in considering many of these items to be 'outstanding issues and concerns',



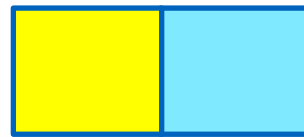
ID	FPCC's Comment	Applicants' Comments
	<ul style="list-style-type: none"> - Flawed and deficient site selection and now with added uncertainties as to the land requirement if projects do not proceed. (S 3) - Loss of landscape and heritage (S 4) and we include submission of Revd Mark Lowther, Rector of Alde Sandlings benefice and Chairman of Friston PCC. (S 5) - Health and safety issues: (S 6) - Noise (S6-1) - Flood and drainage (S6-2) - Design Principles (S6-3) - Landfall and aquifer (S6-4) - Traffic and transport (S6-5) - Cumulative impacts (S 7) - Regulatory regime (S 8) - Protecting local communities and the role of East Suffolk Council (S8-1) - Energy industry review and need for an overall national network infrastructure plan. National Grid conflicts of interest. No proper cost benefit analysis or consideration of alternative options espoused by our MP, Dr Therese Coffey. (S 9) 	<p>FPCC has not taken into account the wealth of the survey, assessment and design information provided by the Applicants, both within the Applications and throughout the Examinations.</p>
<p>3 Site Selection</p>		



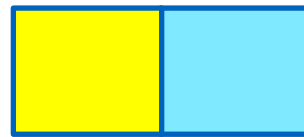
ID	FPCC's Comment	Applicants' Comments
4	<p>It remains that we and surrounding communities consider that the site selection process was severely flawed and deficient.</p> <p>We are at the heart of the Suffolk Heritage Coast with all its ecological, environmental and social benefits in a peaceful and tranquil area.</p> <p>Friston could lose the landscape and heritage benefits of its setting which has existed for 1,000 years.</p> <p>It is unacceptable that uncertainty remains as to whether the site is a 'dumping ground' for another connection point or some more covert means of developing an energy hub for additional projects. National Grid 'offered' this site to SPR but has been conspicuous by its absence in the Examination which is perceived as a dereliction of its responsibilities and accountability as the national supply operator and co-ordinator. Following the recent hearings, it now seems uncertain if and when both projects proceed, in which case why the need for the land in Friston? Just what are the timescales? How much loss and disruption are our communities to suffer?</p>	<p>The Applicants have made numerous representations relating to the robust site selection process undertaken by the Applicants. The Applicants note the presence of four significant 400kV overhead line circuits mounted on two rows of pylons and the removal of field boundaries in recent history to accommodate intensive agricultural use, in the vicinity of the proposed substations.</p> <p>A robust assessment of landscape and visual assessment Landscape and Visual Impact Assessment (LVIA) GIS Addendum (REP11-028) and Heritage Assessment GIS Addendum (REP11-075) has been presented to the Projects' Examinations.</p> <p>National Grid Electricity System Operator (NGESO) has clearly stated in its Post hearing submission (REP3-110) that national grid does not have a strategic plan for connections around Friston.</p> <p>As nationally significant projects, necessary flexibility has been incorporated within the Projects' concept design to ensure successful delivery of the Projects. Sufficient measures, such as the Substations Design Principles Statement (AS-133) are secured to ensure that the Projects are constructed and operated in compliance with their DCOs, and their impacts reduced where practicable, cost efficient and safe to do so.</p>
4 Loss of Landscape and Heritage		
5	<p>There remain the concerns of Historic England, SCC and ESC along with those of the experts employed by SASES at the irredeemable loss of landscape and heritage – the settings of historic buildings and, at its heart, the Grade II* listed Church of St Mary the Virgin, Friston.</p>	<p>The Applicants recognise that the substations and their associated infrastructure would change the settings of some of the adjacent Listed Buildings, affecting the significance of Little Moor Farm, High House Farm, Woodside Farmhouse and the Church of St Mary, Friston. There is some disagreement between parties regarding the level of harm, which is ultimately a matter of professional judgement. The design of the substations has been modified, in discussion with relevant consultees, and</p>



ID	FPCC's Comment	Applicants' Comments
	<p>Our Chairman and Rector of the Alde Sandlings Benefice which embraces the other affected Parishes has prepared the attached submission which was to have been presented at ISH 16. This encompasses all that we stand for.</p>	<p>landscaping has been proposed to mitigate these adverse impacts. However, it is accepted that some degree of harm to significance would be unavoidable.</p>
<p>6 Health and Safety</p>		
<p>6</p>	<p>6-1 Noise</p> <p>The impact of operational noise is unknown and separate experts of ESC and SASES have highlighted inadequacies or disagreement with the approaches of the Applicants. Those of SASES and other Interested Parties remain, but ESC as discharging authority has reached some compromise with the Applicant which we regard as insufficient. It questions the role of ESC in this Examination (see S8-1 below).</p>	<p>The impact of operational noise is not unknown. Extensive, detailed assessment work has been undertaken, the most recent results of which are presented within the Noise Modelling Clarification Note submitted at Deadline 4 (REP4-043). East Suffolk Council (ESC) has accepted the maximum operational noise rating limits specified within Requirement 27 of the draft DCO (document reference 3.1) given the provisions within the updated Substation Design Principles Statement (AS-133) to adopt Best Practicable Means to reduce the limits further at the detailed design stage where commercially and practically viable. It is therefore agreed that no significant adverse impacts will result from operation of the Projects.</p>
<p>7</p>	<p>6-2 Flood and Drainage</p> <p>Flooding was identified as a major issue at a meeting of Friston Parish Council with the Applicants in July 2019 and SPR assured the Council that would receive priority.</p> <p>It is incredible that on the basis of ISH 16 in the presence of experts of SCC and SASES, that this is still mired in obfuscation and shortcomings of the Applicant.</p> <p>The issues are straightforward:</p> <ul style="list-style-type: none"> - Friston is subject to flooding and the frequency has increased over the last three to five years. 	<p>FPCC's assertions regarding the source of the flooding within Friston are incorrect. A detailed analysis of the available baseline data on flood risk to Friston is presented within section 3.6 and section 3.7 of the Applicants' Outline Operational Drainage Management Plan (AS-125). This includes consideration of the Friston Surface Water Study and Friston Surface Water Technical Report prepared by BMT on behalf of Suffolk County Council (SCC) in 2020, which confirm that run-off from the National Grid substation and onshore substations locations are only minor contributors to the flow upstream of Friston and that they have no significant surface water flood risk.</p> <p>The Applicants have undertaken initial infiltration testing at the proposed locations for the sustainable drainage system (SuDS) basins, the results of</p>



ID	FPCC's Comment	Applicants' Comments
	<ul style="list-style-type: none"> - There is run-off from fields to the North and South which accumulates in the heart of the village at the junction of Mill Road, Grove Road and the Aldeburgh-Saxmundham Road. - But the worst source is the run-off from the fields where the site is to be which gushes down an unmade track, across Church Road (since the underground pipe cannot cope) into what is no more than a ditch, no matter whatever grandiose term ascribed to it, and which is inadequately maintained by whichever responsible authority (SCC or Department of the Environment?). At the time of writing, it is overgrown owing to a wet Spring season. - It is quite obvious that deep piling and large areas of aggregate and concrete are going to increase hugely the run-off. But it remains vague as to the effectiveness of the protective measures being offered by the Applicants. At present they are not acceptable to SCC and SASES and the community. 	<p>which have been submitted to the Examinations (AS-129). This has enabled agreement with SCC on outline designs for the basins that can be accommodated within the Order limits while adhering to a number of safety factors. The proposed SuDS can ultimately be considered beneficial to Friston in that during a severe weather event it will gather and contain excess surface water before releasing it at a controlled rate.</p> <p>Post-consent, the infiltration rate at each SuDS basin location will be verified by further infiltration testing, the results of which will be used in the detailed design of the SuDS basins.</p>
8	<p>6-3 Design Principles</p> <p>When selecting the site at Friston, we would have reasonably expected the Applicant to have considered outline infrastructure design in a virgin rural area immediately next to a village as part of that process. But here at ISH 16 design is still subject to clarity, eg the height of equipment, the type of insulation (which apparently has implications for the carbon footprint) and their sheer scale.</p> <p>All subject to agreement with suppliers, contractors and National Grid.</p>	<p>In referring to a 'virgin rural area', FPCC fail to acknowledge the presence of four significant 400kV overhead line circuits mounted on two rows of pylons and the removal of field boundaries in recent history to accommodate intensive agricultural use, in the vicinity of the proposed substations.</p> <p>The Applicants acknowledged during the site selection process (Appendix 4.5 – Summary Note on Landscape and Visual Impact and Mitigation (APP-446)) that although the substation site is not subject to landscape designation, it is susceptible to change in its own terms, relating to the ability of the existing rural landscape character to accommodate substation development of this scale. There are also inherent visual sensitivities due</p>



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	<p>To cap it all the Applicant appears to be prevaricating about the need for an independent specialist review prior to construction as a means of satisfying the discharging authorities and reassuring residents.</p>	<p>to the proximity of rural residences and small scale rural villages to these zones. Development of the substations at the Grove Wood, Friston location would, however, appear from the high-level LVIA to have significant effects on fewer landscape and visual receptors overall, when compared to other areas considered and would focus significance on the local landscape character, residents of Friston and people walking/driving past the substations on the local PRow/road network.</p> <p>The Applicants have addressed the matter of an independent review of the substation design within its Written Summary of Oral Case ISH16 (AS-135). In summary, the detailed design of the substations will require extensive detailed system studies, power quality studies and procurement and warranty negotiations involving multiple suppliers over a period in excess of 12 months, in order to ensure an efficient, cost effective, safe and equipment compliant substation is delivered. It would not be feasible to carry out a review of the various stages at the end of that process. Furthermore, the Substation Design Principles Statement (AS-133) sets out the principles that the Applicants must adopt which will influence the detailed design process which will seek to make further reductions in substation footprint, height and received noise levels where cost effective, efficient and safe to do so. The design principles are the correct mechanism for delivering further reductions in the environmental impact of the Projects.</p>
9	<p>6-4 Landfall and Aquifer</p> <p>Similar concerns remain at landfall and along the cable corridor relating to the fragility of the coastline and aquifer. SEAS has identified the need for a hydrological survey to further understand how the proposals might impact on the fragility of the underground aquifer.</p>	<p>The Applicants refer to their Landfall Hydrogeological Risk Assessment (REP6-021) submitted at Deadline 6. The Applicants also note the Environment Agency's Deadline 11 submission (REP11-112), which comments on REP6-021, and their Deadline 12 response (document reference ExA.AS-17.D12.V1).</p>



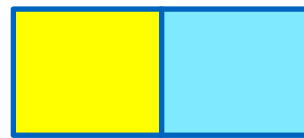
ID	FPCC's Comment	Applicants' Comments
		<p>The Landfall Hydrogeological Risk Assessment (REP6-021) presents a Tier 1 assessment of the potential risks posed to the aquifer by the landfall construction works using the publicly available information. Such an assessment is sufficient to provide a robust appraisal of potential risks, noting that no potential impact pathways have been identified and as such the proposed activities are considered to be low risk. The Applicants will revisit and refine the risk assessment post consent once ground investigations are completed as part of the horizontal directional drilling design process and this will account for those items raised by the Environment Agency in its Deadline 11 submission (REP11-112).</p>
10	<p>6-5 Traffic and Transport</p> <p>The impact of the increased volumes of traffic and their nature, especially at peak season and whilst Sizewell C is constructed have all been aired and little comfort has been taken from the apparent lack of concern for the rural network and which remains a major safety issue in Friston.</p>	<p>The Applicants have undertaken extensive work regarding the Projects' potential traffic and transport impacts with all matters now being agreed with SCC and Highways England. The potential cumulative construction effects of the Projects with Sizewell C have been robustly assessed in line with the appropriate guidance as presented within Sizewell Projects Cumulative Impact Assessment (Traffic and Transport) (REP6-043), which concludes that impacts at most locations on the highways network will be minor and the appropriate mitigation measures have been selected and agreed with SCC where necessary.</p>
7 Cumulative Impacts		
11	<p>We shall not dwell on these unduly as they have been heavily highlighted in past representations. Suffice to list those most apparent.</p> <ul style="list-style-type: none"> - Sizewell C – 7-12 years construction and under public Examination. Cumulative impacts on landscape, traffic, infrastructure, social fabric etc. 	<p>The Applicants have now made a number of submissions to the Examinations on the majority of the issues listed by FPCC, and in particular would reiterate the following:</p> <p>Regarding Sizewell C, the potential for cumulative impacts with the Projects has been fully considered. In addition to the assessments presented within the Environmental Statement, the Applicants screened the Sizewell C application materials on publication to identify potential</p>



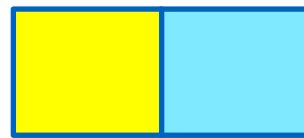
ID	FPCC's Comment	Applicants' Comments
	<ul style="list-style-type: none"> - National Grid – Nautilus and Eurolink Interconnectors looking to establish sites and links within this same area of the Suffolk Heritage Coast. - Other potential offshore windfarm connections. - Storage and Battery facilities. Not addressed in this Examination but another potential demand on land usage in this area. - The carbon footprint of these projects individually and cumulatively. - The impacts of despoiling the area for incomers and visitors and in turn the economic consequences for inward investment and the visitor economy etc. - The cumulative impacts on traffic and transport and local infrastructure - accessibility, health and social care, quality of life, health and wellbeing. 	<p>cumulative impacts for assessment. In particular, this process resulted in the Applicants preparing Sizewell Projects Cumulative Impact Assessment (Traffic and Transport) (REP6-043) regarding cumulative traffic and transport impacts and Landscape and Visual: Sizewell C Cumulative Impact Assessment (REP2-010) regarding cumulative landscape and visual impacts.</p> <p>Regarding other transmission or offshore wind farm projects in the vicinity of the Projects, cumulative impact assessment requires an understanding of different projects' potential impacts and how their zones of influence may interact; detailed knowledge on location and potential impact is crucial to this. Of the projects that different parties' submissions to the Examinations have asserted will connect to the grid at Friston:</p> <ul style="list-style-type: none"> • National Grid Ventures' (NGV's) Deadline 3 submission (REP3-112) states that while it has engaged in early discussions with stakeholders and maintained a dialogue with NGEN, at no point has this translated into a confirmed grid connection at Friston for Nautilus or Eurolink. NGV's Deadline 11 submission (REP11-119) states that a grid connection at Friston is an assumption in its site selection process for these projects. Public consultation on this site selection process will not commence until late summer 2021 and Environmental Impact Assessment scoping will not occur before the first quarter of 2022; • It has been confirmed that Five Estuaries is pursuing a grid connection away from the Friston area (AS-100); and • It has been confirmed that North Falls is pursuing a grid connection away from the Friston area (REP7-066). Additionally, there is currently <u>no information</u> regarding possible locations for the North Falls infrastructure.



ID	FPCC's Comment	Applicants' Comments
8 Regulatory Regime		
12	<p>It is apparent that the framework of EN -1 (Overarching National Statement for Energy) Is outdated. It has been overtaken by new and potential technical developments within the energy sector which are recognised in the BEIS Review and the recent Government Energy White Paper. Also, it fails to acknowledge other Government initiatives and policies relating to the environment, human health and wellbeing. Instead, we are a left with a tick box exercise which precludes 'thinking outside the box' and inclines others towards abdicating responsibilities since the ultimate decision rests with the Secretary of State.</p> <p>It is clear that a brick wall has been reached in the piecemeal approach to connection points for offshore windfarms and also transmission across Norfolk and Suffolk.</p> <p>Consequently, Norfolk and Suffolk MPs are responding to the concerns of constituents and seeking a more co-ordinated approach to alternatives.</p>	<p>The Applicants have brought forward the projects in line with the legal and Regulatory Framework provided and the relevant National Policy Statements EN-1, EN-3 and EN-5. This is in accordance with the requirements of the Planning Act 2008. The subsequent policy initiatives set out in the Energy White Paper explain the urgent need for the accelerated deployment of further offshore wind capacity. This is consistent with the Government's key response to the challenges of the climate emergency whilst also creating employment and increasing economic activity in fragile coastal communities. In addition the deployment of such capacity will have a role in in keeping down energy costs to the consumer. It is noted that the Church of England has taken a strong stance on the importance of urgently responding to the challenges of climate change and has set a goal for the church to become net zero by 2030. It has called on the UK government to take a much bolder action on climate change in this country in advance of COP 26. As the Energy White Paper acknowledges this will require a radical change through a Green Industrial Revolution and an acceleration of deployment of renewable electricity.</p>
13	<p>Protecting Local Communities</p> <p>The existing regime suggests that local communities cannot be relied upon and are not equipped to address technical, economic and social issues. This is quite clearly inappropriate when considering the weight, depth and breadth of input of local Interested Parties, Aldeburgh Town Council and the action groups, SASSES and SEAS et al.</p> <p>The Covid-19 restrictions throughout the Examination have severely diminished the opportunities for community engagement and</p>	<p>The Applicants have no comment to make on this matter. It should be noted that East Suffolk Council have moved to a neutral position and do not object to the Projects</p>



ID	FPCC's Comment	Applicants' Comments
	<p>communication with the relevant local authorities and within communities themselves. The authorities have to commit greater resources to the ongoing Sizewell C Examination never mind the impossible conflicts in demands on the communities themselves.</p> <p>However, it is felt that there should have been more commitment to local engagement by the statutory consultees since they become discharging authorities.</p> <p>SCC is limited to its specific areas of Highways and Flooding and Drainage roles. There have been insufficient opportunities to consider other relevant issues such as implications for health and social care which fall within their remit.</p> <p>As it is, they remain opposed to the developments albeit they have gone along with the traffic and transport proposals as the 'least worse options' and still not satisfied with the flood and drainage proposals.</p>	
14	<p>Our greatest concerns relate to East Suffolk Council (ESC)</p> <p>We acknowledge the challenges and demands of managing Covid-19, these developments and Sizewell C on the support teams and the diligence needed.</p> <p>Our concerns are at the senior and Councillor levels. And the apparent conflicts of interest.</p> <ul style="list-style-type: none"> - The work and time of ESC is paid by the Applicants, so there is bound to be a bending to their views and pressure. - Added to which there has been a 'passive' approach, almost amounting to a dereliction of responsibility to considering the 	<p>The Applicants have entered into agreements with ESC to ensure that the council had the ability to deploy appropriate resources during pre-application and through the application process. This support is not contingent in any way as to the Council's position in relation to the applications. It has enabled the council, at officer level, to review and comment on issues within the sphere of the council's responsibilities.</p> <p>The Applicants have also engaged with the Council over the content of the section 111 Agreements and the Memorandum of Understandings (MoUs). The basis for the agreements has been set out before the examination.</p> <p>The Council's position before the examinations reflects both the professional advice of experienced officers and the decision making of the Council's Cabinet.</p>



ID	FPCC's Comment	Applicants' Comments
	<p>wider strategic issues in deferring to the Secretary of State as the decision-maker.</p> <ul style="list-style-type: none"> - Their overall judgment has been split between the local needs of Lowestoft and Great Yarmouth and industry lobbyists at the expense of the needs of the Suffolk Heritage Coast. - We willingly acknowledge the emerging opportunities and the focus at government and industry levels on a more co-ordinated approach to capitalising on the competitive advantages available to offshore wind energy. - But these are not at risk from opposing the connection point at Friston. - However, it has infected their decision to adopt a neutral position which sends the message of no support for this area and its communities. - Indeed, this has resulted in conflicts at Council leading to the resignation of two of our Ward councillors who felt that their concerns for the local impacts were insufficiently addressed. We understand that former Councillor, Mrs Jocelyn Bond, has made representations to the Examining Authority on these points. - Accordingly, we feel we are now being inadequately represented in the crucial final stages of the Examination; that there will be insufficient rigour in reaching their Council decisions and actions as discharging authorities. - Not least are the concerns around mitigation (tree-planting etc) and the lack of community engagement covering 	



ID	FPCC's Comment	Applicants' Comments
	<p>compensation and the seemingly insufficient sums agreed with the Applicant.</p> <ul style="list-style-type: none"> - Signing off actions with the Applicant where key concerns may have been insufficiently addressed. 	
9 Energy Industry Review		
15	<p>No doubt you are tired of us and others referring to the BEIS Review. But its very existence points to the shortcomings of the existing processes and the need for a more strategic and coherent approach</p> <p>It is wrong to prejudice the future legacy of this area for the sake of a quick decision before the review has time to consider options which offer better outcomes.</p> <p>We are not NIMBYs or luddites. Any sensible person would argue against placing 30 acres of industrial ironmongery in the heart of the rural countryside and just five minutes' walk away from a popular village.</p> <p>We strive better to understand the real issues and sift through the 'noise' from industry lobbyists surrounding climate change and renewable energy.</p>	<p>The BEIS review sits within the context of the Energy White Paper. This acknowledges that the wider changes to the offshore grid system will not be capable of being realised until the later part of this decade. The delayed delivery of Round 3 projects would not be consistent with key White Paper objectives. The White Paper has not introduced a moratorium on projects coming forward. This would have had the effect of reducing the stimulus that is required for the development of the offshore supply chain and would have delayed a project stream that is identified as being critical to the UK's response to climate change This is why the Government is seeking to double the CfD pot to 12GW.</p>
16	<p>Our concern is for the proper assessment of the strategy and our latest thinking is informed by the work and reputation of Sir Dieter Helm. He is Professor of Economic Policy at the University of Oxford and an adviser to the UK Government and author of its Cost of Energy Review in 2017. His latest work 'Net Zero – How We Stop</p>	<p>There are a lot of organisations and bodies publishing reports on how the UK should achieve Net Zero. It is up to Government to decide which advice it chooses to accept and reflect it in policy. The Government has set out its position in the White Paper.</p>



ID	FPCC's Comment	Applicants' Comments
	<p>Causing Climate Change' published earlier this year is a salutary and uncompromising assessment of the challenges.</p> <p>He writes of 30 wasted years in failing to address effectively infrastructure issues. We in Friston feel that we are victims of that neglect.</p> <p>His premise is that there should be an overall national network infrastructure plan and that should incorporate;</p> <ul style="list-style-type: none"> - The challenges of intermittency of renewables. - The interaction between local networks. - Energy storage and carbon capture. - Local generation. - Batteries. <p>Few if any of the above issues have been considered as part of the Examination, but they are relevant in the wider area of future direction and potentially add to the cumulative effects in our congested local geographical environment.</p> <p>Also, these have to be planned and co-ordinated at government level to drive investment and R&D which will then incentivise the private sector and avoid conflicts of interest</p>	
17	<p>There seems to be an acknowledgment that the systems operator should be a separate entity removed from the National Grid and feasibly publicly controlled (similar to the recent establishment of Great British Railways) and to avoid conflicts of interest. These impediments have certainly confused and irritated in this Examination where the various arms of National Grid have failed to</p>	<p>The Applicants and others have to work within the legal policy and regulatory framework provided.</p>



ID	FPCC's Comment	Applicants' Comments
	<p>engage in the myriad of concerns in these developments and those of their own in the pipeline.</p> <p>Instead, the proposals before us are being considered in an inappropriate narrow way.</p> <p>There is no sense of these being considered as part of an overall energy strategy</p>	
18	<p>As with most of these developments there is no proper cost benefit analysis:</p> <ul style="list-style-type: none"> - The cost of its own carbon footprints - Cumulative impacts - Loss of natural sequestration. - Loss of social amenity - Which detracts from healthier lifestyles and wellbeing - Which are embedded in current government policies which in turn - Offer economic benefits of inward investment and visitor/hospitality sector. <p>The benefits of a wider strategic review, alternative options and brownfield sites are borne out by the initiatives espoused by our own MP and Secretary of State for the Department of Works and Pensions, Member of the Cabinet. These are on record in the Examination library.</p>	<p>The sites mentioned have been fully evaluated as part of the CION process. The Government has set out economic priorities which include active support for the development of the offshore supply chain in respect of construction and operation aspects. This will support the Government's levelling up agenda and the green recovery.</p>