

## **Written representation By Fiona Gilmore**

**EA1N Unique Reference No: 20024391 (RR-356)**

**EA2 Unique Reference No: 20024393 (RR-356)**

### **Foreword**

My name is Fiona Gilmore. I have lived with family in Coastal Suffolk for over 30 years. I live here permanently now, and my wish is that my children and my children's children will choose to live here too and continue to be active members of the community.

I founded SEAS Campaign in August 2019 when I first read about the plans for SPR EA1N and EA2.

Suffolk Energy Action Solutions (SEAS) is a forward-looking, progressive group of campaigners, and our mission is to make a step change in thinking strategically, not tactically about energy generation and infrastructure.

We see how outdated and inefficient current plans for onshore infrastructure really are. We are totally in favour of renewables and support further research and development into tidal energy, solar energy, fuel derived from secondary crops and algae. We also advocate energy conservation and home energy generation. This is at odds with large developers' ambitions but we believe that the UK should be exploring a radical range of solutions where we are not just dependent on the competitive market of corporate developers. That is old style thinking.

We wish to endorse Lowestoft as the centre for clean energy and we promote the ambition to set up a major international R&D Centre in Lowestoft for the rapid advancement of alternative energy.

It is because we endorse relevant innovation that we are in complete opposition to these outdated and inefficient plans presented by ScottishPower and National Grid.

Savings of £6billion can be made if we transition to integrated offshore solutions and for the immediate term regarding projects to be completed by 2028, the technology is available to capture the wind energy from four wind farms in a single corridor through the sea to a single brownfield site, be it Bramford or Bradwell or another.

For future projects there is time to set up the new fully integrated system and choose the Mega Hub site which will be the principle feeder for the London market.

Only brownfield sites need ever be used. There is absolutely NO NEED to desecrate medieval villages and destroy unspoilt countryside in the name of green energy. NO NEED.

## SUMMARY

1. **The severe adverse impacts of these plans outweigh the benefits.**
2. **These plans are contrary to the relevant National Policy Statements. There are compelling reasons to refuse development consent.**
3. **The site chosen is one of the most FRAGILE and DELICATE places in the UK. There are better alternative brownfield sites.**

## DETAILED SUBMISSION

### 1. **Cumulative impact will be overwhelming.**

The cumulative impact of eight substations and inter-connectors being constructed over a period of 12 to 15 years represents the largest Mega Hub in the UK and Europe. This vast complex of 120 industrialised acres should quite simply be located on a brownfield site and not in an area where there is uniquely rich ecology and biodiversity and where tourism and agriculture are the main economic sectors for local communities. SEAS Campaign has listed the eight substations and interconnectors planned as well as Sizewell C.

### 2. **A rural community needlessly destroyed.**

The essential rural character of Friston and the surrounding area will be lost forever. The adverse impacts, including impacts of visual intrusion, landscape harm, heritage harm, noise pollution, flood risk, light pollution, dust and tropospheric ozone poisoning cannot be mitigated to levels which could be regarded as acceptable.

### 3. **Permanently impaired habitat and decimated biodiversity.**

12 to 15 years of construction where trenches are reopened will sever wildlife corridors for ever. The 872 species counted at the Hundred River in Aldringham will be dramatically reduced. The loss of tranquillity and light pollution will disturb all wildlife.

### 4. **Air quality will fall below minimum acceptable standards.**

Tropospheric ozone levels will increase to the most alarming levels in the UK given that they are already recorded as high (Sibton measurement centre). Diesel particulates will be the main cause of this air poisoning, compounded by Sizewell C HGVs.

### 5. **Unsuitability of roads. Congestion will be inevitable on the A12 and A1094.**

Rural highways and byways were not designed for mass industrialisation. Whilst the A12 can be improved with bypasses it is not appropriate to change the character of the A1094 or the other lanes leading to Aldeburgh, Thorpeness and Leiston.

### 6. **Health deterioration.**

There is increasing evidence amongst doctors and mental health specialists that vulnerable communities who are exploited or needlessly threatened can suffer trauma. This kind of trauma is manifest in 2020 in these local communities after two years of increasing worry and anxiety.

## **7. Tourism decline and economic decline.**

Road congestion, noise pollution, construction works, and the growing sense of industrialisation will change perceptions amongst loyal and new visitors to the region. They will find more attractive places to visit and over 12 to 15 years Aldeburgh and the hospitality venues including hotels and restaurants will close or become commoditised. £600m to £700m revenues will be lost over this period (Source: DMO Research September 2019: £40m annually amounting to £700m over 15 years with exponential meltdown).

## **8. Social issues will re-emerge.**

During construction works for Sizewell B in the late 1980s and early 1990s, there were significant adverse impacts within communities with the influx of temporary workers. Ownership of firearms, petty crime, drug abuse, alcoholism, prostitution, divorces increased in Leiston and neighbourhoods. No permanent jobs result from these plans.

## **9. Safety issues will arise.**

There are diverse threats to safety. First, there is the issue of emergency services being delayed by traffic congestion. Second, there is concern around fire safety near substations as they are situated in close proximity to houses in Friston. The evacuation plan for Sizewell B is for within a 30 km radius. No consideration has been made to the impacts of these proposals on those evacuation plans.

## **10. Noise pollution.**

Friston is silent at night. The intrusive noise levels as evidenced in other substation sites, including Inverness, point to the very serious impact on sleep, caused by the low humming noise, leading to insomnia, headaches, sickness, even epileptic fits. The Environmental Statement has many errors and omissions. We endorse SASES Noise analysis carried out by a specialist. We believe that it is unacceptable that you cannot open a window at night when you choose to live in a peaceful village, due to the noise.

## **11. Agricultural land grab.**

There is a significant loss of Grade 2 and 3 agricultural land, over 30 hectares.

This land will be compulsorily purchased at low prices by SPR and in its own way, this is tantamount to a land grab. It is the ugly side of green energy infrastructure as currently devised.

## **12. Landscape impact.**

From nature reserves in Snape at North Warren, even from Snape Maltings river walks, these towering steel and concrete installations will be visible. From Friston gardens, the Mega Hub will rise up like a monstrous behemoth, an unprecedented industrial giant.

## **13. Pilgrims' pathways will be eradicated.**

Rural communities flourish where there are well-trodden paths joining up different parts of the village. Friston is no exception and there is a particular path from the Church to Friston Moor which has been there since the time of Chaucer and the pilgrims. This path will be eradicated, along with others. Ancient hedgerows, old oak trees, wildlife will disappear for ever.

#### **14. Flood risk.**

Friston is a village partly built on clay. We have photos of Friston when it is flooded, which happens all too often. It is the worst possible geological base for building this industrial complex and further flooding is inevitable even with new drainage systems due to the lay of the land. Further environmental assessment is required.

#### **15. Heritage.**

We support SASES assessment of the catastrophic impact on local heritage. At least seven listed houses will be rendered uninhabitable for 12 to 15 years. Other homes will be deserted and will fall into dilapidation. Friston will become a ghost village and St Mary the Virgin Church will become a lonely retreat for those who care about its future security.

#### **16. Alternative sites.**

SEAS Campaign has focused on this question and in summary, we believe that there are alternative better brownfield sites available and using new HVDC technology these sites become viable and cost efficient.

Rather than repeating what we say in the SEAS Representations, this alternative approach is a WIN/WIN/WIN/WIN/WIN.

- Win for the Environment and rare habitats.
- Win for the delivery of wind energy in an efficient integrated way.
- Win for the lives and livelihoods of local communities.
- Win for the developer who can accelerate its implementation programmes without lengthy mitigation and Judicial reviews.
- Win for the Government because zero carbon emission targets can be met on time and on budget.

#### **17. DCO plans contain inadequate provision for securing mitigation of the adverse impacts of these plans.**

How does SPR value an ancient oak, a turtledove, a pure red deer?

How does SPR value a pilgrims' pathway? These are Nature's assets. They need to be valued alongside the value of good health and well-being for local communities.

We believe that the value of these assets is inestimable. They are priceless. We therefore do not agree that the benefits of these particular plans can possibly outweigh the severe adverse impacts which are unavoidable, even with attempts at greater mitigation.

#### **18. We ask the Inspectorate to adopt a new cost benefit analysis.**

It is not simply a question of cost of building the wind farms and the delivery of that energy, and the resulting cost of electricity for consumers. This is an outdated evaluation formula. I would suggest that the new approach is to factor in the environmental, economic and social costs in addition to the conventional costs.

### **The New Value Benefit equation:**

$$X = Y - (A \times B \times C \times D \times E \times F \times G \times H \times I)$$

Where:

$X$  = Wind Energy generated by each wind farm and delivered to Friston

$Y$  = the benefits or disbenefits resulting from the exponential impacts over 12 to 15 years caused by these particular plans, and the exponential impacts have to be deducted from  $Y$ . They are a multiple, not an additional sum.

$A$  = Ruination of Friston

$B$  = Air quality reduction

$C$  = Traffic congestion on rural roads

$D$  = Tourism decline

$E$  = Economic decline

$F$  = Social and health decline

$G$  = Biodiversity reduction

$H$  = Habitats decline

$I$  = Environmental decline

### **19. The bigger picture**

19.1. Existential threats: Suffolk's unique positioning and its assets.

We need to judge these plans in the wider context of the essence of Suffolk. What is Suffolk all about? What are its traditional strengths? What are Suffolk's vulnerabilities?

Coastal Suffolk faces many existential threats from flooding, erosion, and from mass industrialisation. The history of the county is varied. From the 14th to 17th centuries Suffolk was one of the chief manufacturing counties of England thanks to its cloth-weaving industry; in the 17th and 18th centuries its agricultural resources were utilised to provide the growing metropolis with food. In the 19th century various textile industries flourished. Fishing and trading have been constant economic mainstays. Suffolk is today proud to be developing ten Growth sectors, namely: Energy; Advanced Manufacturing; Information and Communication technology; Finance; Food, Drink and Agriculture; Ports and Logistics; Tourism; Creative and Cultural industries; Biotechnology, Marine Technology.

In the "Suffolk Growth Strategy" published by the Suffolk Council in the introduction it says:

*"We also take great pride in our environmental credentials and our longstanding commitment to become the UK's "greenest county".*

I believe that the future sustainable development for coastal Suffolk is contingent on the following:

1. Smart, affordable housing developments in locations close to amenities and roads.
2. Improvements to Road infrastructure, for example, the A12 needs some bypasses and new bridges at Ipswich for better access.

3. Further amplification to the Heritage Coast narrative. This is a major asset for tourism and should not be diluted in any way. Suffolk has its own character and qualities. Suffolk should not be homogenised or standardised. Its differences are its strength.
4. Careful and intelligent articulation of the Clean Energy narrative. This requires world class thinking with regard to infrastructure. A Research & Development Centre in Lowestoft would underpin its thought leadership positioning in this growing sector. The infrastructure would need to be exemplary and demonstrate through action not words how developers are more environmentally responsible, and how the UK Government (in this case, BEIS) is taking back more control.
5. The Food and Drink/Hospitality narrative needs to be nurtured and encouraged. Famous today for hundreds of successful niche brands, including wines, Fisher's Gin, Adnams brewery, Big Tom and James White Apple juice, Suffolk Baron Bigod cheese, Sutton Hoo chicken, Stokes Tomato Ketchup, asparagus, orchard fruits, lobsters and crabs, Pinney's of Orford smoked fish and more besides.
6. The Creative Energy narrative is quietly growing across the county. With huge numbers of artists, composers, designers, musicians, poets and writers inspired to live here because Nature is breathtakingly beautiful, with ever-changing shorelines and river tributaries, with vast horizons and rolling seas, where wildernesses and marshes continue to enchant, all contributing to make this a paradise for original, productive work.

These sectors and the newly emerging sectors of Biotechnology and ICT are exciting for Suffolk. They are all interdependent and will flourish if Suffolk continues to offer excellent quality of life and protects its traditional assets, not in aspic, but constantly improving. Its green credentials need to be a priority if Suffolk really does wish to be the "*greenest county*".

These economic growth sectors can co-exist only if there is **sensitive** development of each and in particular of the infrastructure. Suffolk will continue to thrive and Tourism and Agriculture will continue to be principal business sectors; there is no reason why Clean Energy cannot become a significant sector, but not with careless and callous plans such as these.

We believe that there is a conflict in the Growth Locations identified. The first five Locations are all urban and already have higher populations. These include Greater Ipswich and Felixstowe. The sixth Growth Location identified is Sizewell and surrounding areas. We see Sizewell area as essentially rural in character and not like these five other Locations mentioned. Minsmere and the local AONB, SSSI and other Nature Reserves are the treasures which need to be preserved to achieve the accolade of the *greenest county*. Green energy can be delivered using new integrated solutions to *fewer* brownfield sites in order to fulfil these green objectives. The Tourism sector is particularly strong in terms of Cultural tourism (Snape Maltings, Britten-Pears Arts, the Poetry festival, the Literary Festival, the Documentary Festival, The Food and Drink festival and more) and Outdoor Activities (Rambling, Bird Watching, Dog Walking, Marathons, Swimming, Cycling). All these kinds of niche Tourism will be seriously undermined with the choice of Friston for the siting of this Mega Hub.

19.2. A far better alternative site is available.

We have examined the possibility of taking this grand plan for eight substations and inter-connectors to a better alternative brownfield site. We would ask the Inspectorate to request a full disclosure of the reasons for switching from Bramford, which was intended to be the preferred site to Friston. Cost

reasons alone no longer are adequate for a site to be turned down. New HVDC technology solutions allow Bramford to be reassessed and with new synergies to be gained through the offshore integrated delivery, the additional cost of trenching from Bawdsey to Bramford, where there is already one cable trench, may in fact now be presented as a superior site for EA1N and EA2. That does not mean that Bramford is the preferred site for the subsequent projects which could be redirected to Bradwell, a wasteland site in need of regeneration. This alternative plan in our view, must be considered by SPR and National Grid. We have discussed this in detail in our SEAS Representation.

### 19.3. The role of National Grid. The Goliath of the Energy industry?

We have been baffled by the absence of National Grid in the consultation process. National Grid has clearly been charting a grand plan for a long time and yet, it has been drip fed to local communities over two years. As the architects of the plan, surely National Grid should be answering questions directly, not delegating to SPR?

In other North Sea countries, including Germany, Netherlands, Belgium and Denmark, the TSO is nationalised and is therefore neutral and objective in terms of strategy.

National Grid is both the architect and the builder in the UK. How can one be a poacher and gamekeeper at the same time?

We question how decisions about the site selection for a MegaHub can be taken by the same overall group who will be motivated to please shareholders, rather than exploring more ambitious and ultimately better integrated solutions.

National Grid's interests are interwoven in every aspect of this green energy canvas.

Let us take as an example three projects currently proposed:

1. SPR EA1N and EA2: there is a DCO within these plans for NGV.
2. Nautilus, Belgium Interconnector: National Grid Interconnector Holdings is driving this project. In their plans, we read about NGET and NGESO and their roles. The operator will be involved working with the supplier and the interconnector.
3. Eurolink, Netherlands Tennet joint project using new MPI connections led by NGV.

Curiously, we interviewed Elia, Tennet and specialist consultancies about new offshore technology. Each time we approached any of these organisations, we were told: *"Sorry, we would like to help you, but we can't. There's a conflict with National Grid"*. We then explained that we were not in competition with National Grid. We simply wanted some advice on the latest technology and its possibilities. We came to the sad conclusion that National Grid is so terribly important that no one would dare to upset them in talking with us.

We believe that it is impossible for National Grid to be the arbiter of site location. We don't think SPR chose this site. We think it was chosen for them. What is their right to determine the destiny of local communities, the ecology and wildlife? This is a company owned by its investors, many of whom are not in the UK and who have no motivation to choose a solution which ticks the boxes that matter to local communities? We think National Grid is far too powerful and there is very little redress except for this PINS Examination. We are therefore asking the Inspectorate to give us the chance to speak at the Issue Specific Hearings directly with National Grid in order to ask both SPR and National Grid why the site selection is so ill-conceived? Why was Bramford not selected? Given the BEIS Review can Bramford be reinstated as an option using new HVDC technology?

SPR appears to be the Trojan Horse and close partner for National Grid.

There are precedents in the UK which highlight this very close partnership and its degree of success. The Western HVDC is a £1.3billion subsea cable that transports electricity between Scotland, Wales and England. The project was undertaken by a joint venture between National Grid Electricity Transmission and Scottish Power Transmission (part of the ScottishPower group of companies owned by Iberdrola) in delivering the cable. There is an ongoing Ofgem investigation into National Grid and Scottish Power Transmission over late delivery and whether this means they breached special license condition 61, which specifies the expected delivery date of the Western HVDC subsea cable. The investigation will also examine potential breaches relating to the operation of the cable. Some people may say that we have to trust these operators to deliver on time but, if the ESO is the same group as the developer in this case NGET, it must be complex in terms of accountability. We question whether National Grid has become too big, too powerful and this is to the detriment of fairness in decision taking on site selection, offshore solutions and upgrading the Grid.

Some people say that the major issue is that National Grid did not invest continuously during the last ten years in Grid connections, being motivated by bottom-line and is now like a rabbit in headlights trying to make up for ten wasted years.

## **CONCLUSION:**

In conclusion, we urge the Inspectorate to refuse these plans and call for a coherent national approach to be devised for the planning and management of onshore infrastructure as well as offshore integrated solutions.

*“These projects will place too heavy a burden upon a fragile coastal area of great environmental, economic and social importance”.* (Source: The Aldeburgh Society WR, 1 November 2020).

**Fiona Gilmore**

**2 November 2020**