



WRITTEN REPRESENTATIONS FOR SPR EA1N and EA2 PROJECTS (DEADLINE 1)

INTERESTED PARTY: SIMON IVE

PINS Refs: 20023671 and 20023672

Date: 30 October 2020

1. SUMMARY

I oppose the Applicant's proposals on the following grounds: (S2)

- They destroy or damage the character of the area; the landscapes, habitats and social fabric. (S3)
- The choice of site is unacceptably close to the village of Friston and its social and spiritual hub. (S4)
- The cumulative impacts of twelve energy projects in the area extending over fifteen years and most affecting Friston. That includes the transformative Sizewell C two nuclear reactors. (S5)
- National Grid has failed to explain and account for its role as responsible for transmission and connectivity. (S6)
- Inadequate consideration of UK Government policies to protect the environment and their importance for human health and wellbeing. (S7)
- Damage to the local hospitality and services sector and threat to employment. (S8)
- The burden on communities of the cumulative impacts; lack of meaningful mitigation and threat to local services. (S9)
- Instead invest in the strengths and opportunities of the area for natural and human appreciation. (S10)

2. OPPOSING THE PROPOSALS

I am wholly opposed to the Applicant's proposals as set out in their Development Consent Order Application.

I especially support the Written Representations of SASES in conjunction with Friston Parish Council who also oppose the developments and those of Friston Parochial Church Council.

I note and also support similar opposition from my MP, Dr Therese Coffey, Suffolk County Council, East Suffolk Council and other opposing individuals and organisations including Save our Sandlings and SEAS (Suffolk Energy Action Solutions).

I am not opposed to the need to develop more carbon-free and renewable energy to help meet Government climate change objectives. Nor do I deny the opportunities for jobs and infrastructure spending but these should be in areas of greater need and deprivation. Refusal of consent to the development at Friston does not imperil those objectives.

3. PRESERVING THE GIFTS OF CREATION

Our attachment to this area goes back some 40+ years. An autumn weekend break, we were inspired by the sea and landscapes and a magnificent last act of 'Götterdämmerung' at Snape Maltings Concert Hall.

Accordingly, we want to preserve the gifts of creation for future generations. We want others to be able to walk the lanes and footpaths; to enjoy the sense of space; the peace and tranquillity; the mystery and history behind our Heritage assets.

We acquired our home in Friston 32 years ago and in our retirement have sought to apply our limited talents to working voluntarily for various charities and organisations, especially trying to secure the future of our church in Friston. The social fabric of the area is sustained by so many others of like commitment.



The manner in which all these energy projects has surfaced is a betrayal of their efforts.

We despair that it has been thought appropriate to place such a development adjacent to the village of Friston and its social and spiritual hub. We fear for our ability to walk around the village narrow lanes as we compete with increased traffic flows through the village during the extended construction period. The closure of footpaths reduces social interaction and impairs health and wellbeing. The village risks being 'isolated' and becoming an unattractive place to live when we need to continue to attract new younger residents to refresh the community.

4. SITE SELECTION

Worse, it seems to presage becoming the connection point for additional energy projects so that the destruction of landscapes and wildlife together with disruption and impairment of human lives and heritage assets will extend over fifteen years

The refusal of consent need not imperil the provision of wind power renewable energy nor the associated benefits which might accrue to Lowestoft and Great Yarmouth as service support centres for the windfarms.

Instead it is about connectivity to the National Grid and the choice of Friston as its hub for these proposals and seemingly more to follow.

It was quite clear from the first Open Floor Hearings in October 2020 that there is urgency arising from the financial need of Scottish Power Renewables to complete the terms of its original licence/contract by a deadline.

Yet that urgency seemingly stems from a late request to find an additional onshore entry point to that at Bawdsey. We are aware of the extreme disruption suffered there.

On what basis was that material change needed and allowed?

So, the requirement to complete at Friston is driven by financial expediency arising from the proximity of Friston to the onshore entry point on a known fragile and receding coastline and cabling route traversing valuable areas of natural beauty and close to communities.

The residents of Friston were only advised of the development just thirty months ago.

5. CUMULATIVE IMPACTS

Meanwhile a whole raft of additional energy projects has entered into the public domain and all affect Friston and the surrounding area officially designated as Suffolk Heritage Coast.

The twelve known projects are set out in the attached schedule.

These include the Sizewell C Nuclear Power Station which has long been in gestation – two nuclear reactors – now in the course of its own planning process and DCO Application. That project alone is transformative extending over a period of 10-12 years and bringing in a workforce of 8,000/8,500 at its peak.

6. NATIONAL GRID

All these raise National Grid connectivity issues. Common sense tells you that their scale and number will have been subject to individual and overall planning discussions within 'the energy industry' – providers, National Grid, regulatory and planning bodies et al and maybe local authorities.

Since National Grid is the monopoly manager of UK electricity transmission, nothing can happen without its involvement – Almost everyone speaking at the Open Floor Hearings asked why on earth has National Grid



not been involved in any discussions of its plans with communities likely to be affected; - that they should be required to submit their own DCO applications for proper scrutiny.

Instead we are left with the impression that ‘murky dealings’ between energy providers and National Grid are behind all these proposals to find the cheapest most accessible landfall sites and connection points for maximising investment returns.

7. NATIONAL PLANNING ISSUES

This in turn brings into question the integrity, objectivity and robustness of the National Planning process.

The ‘energy industry’ can seek the protection of the Overarching National Policy Statement for Energy (EN-1) to claim overriding national interest; that there is a presumption in favour of granting consent to applications; in the event of a conflict with any Local Development Framework/plans, the NPS prevails. Accordingly, the Applicant will request that its case is strictly kept to the confines of that framework

However, this policy dates back to 2011 and weighs heavily against environmental considerations which have substantially influenced Government’s subsequent planning and policies.

Since 2011 Government has continually refined its national policy guidelines and the latest, I refer to is National Planning Policy Framework (2019) and ‘A Green Future: Our 25 Year Plan to Improve the Environment’ published in January 2018. These clearly set out a desire to protect the environment’s ‘green spaces’ and their importance to human health and wellbeing.

It is important that this emphasis is applied to this and future applications.

The piecemeal approach to other projects previously consented has raised the ire of other rural communities; it has failed to encourage the use of alternative technologies and find better means of connectivity. The inadequacy of this approach has led to the establishment of the BEIS Offshore Transmission Network Review. It is similarly important that the findings of that review are addressed to ensure that better alternative strategies and site selection are considered.

8. EMPLOYMENT AND INFRASTRUCTURE SPENDING

The arguments about jobs and infrastructure spending to galvanise the economy will be wheeled out and need to be carefully evaluated. The offshore windfarm sector has been long established so that manufacturing facilities and some service operations will already have been established in the UK. It is quite right that Lowestoft and Great Yarmouth should be able to exploit those opportunities. I find it difficult to find just what proportion of the overall investment in turbines and associated electrical infrastructure actually accrues to the UK.

The infrastructure at Friston and across the area requires civil engineering skills and equipment from elsewhere. That will result in increasing pressures on the local road and transport links and associated pollution which will spread to communities along the cable corridor. These are not temporary bearing in mind the additional projects and their sequencing. The number of jobs during the construction at Friston is assessed at 300 at its peak and the majority would have to be recruited from outside the immediate area. It is acknowledged that no permanent jobs will accrue once the site is operational.

Instead the attractions of the area to new residents and visitors will diminish putting at risk considerable numbers of jobs in the hospitality and service trades, especially local artisans.

9. THE BURDEN ON COMMUNITIES

Communities are expected to respond in short time to applications which extend to around 17,000 pages of extreme technical information beyond their spheres of understanding.



It is apparent that a ‘template’ has been built up by the same advisers/consultants over several applications over the years. Inter-related information will be split over several chapters leading to confusion and lack of clarity and understanding to the layman. Worse, much of the research is desktop and by advisers in far off destinations who have no real understanding of the nature and characteristics of the locations; the environment and human impacts. This insensitivity is borne out by the lack of any meaningful mitigation. In the case of Friston, the planting of trees which after fifteen years might create some screening; replacing a closed footpath with a circular walk around an industrial site! Dismissing residents’ concerns as negligible or not significant.

I deplore the destruction of our natural environment, the habitat loss and threat to wildlife and biodiversity. The countryside is to be dug up (how many times?) and we are to suffer the temporary or permanent closure of valuable footpaths. I walk the paths along the Sandlings Way to Thorpeness, Sizewell and onwards past Minsmere to Dunwich and through woodland to Eastbridge along a diversity of landscapes and beside the North Sea.

In reflecting on all this, I keep returning to the schedule of all the energy projects (and you will have received the SEAS report which lists them) which includes Sizewell C. Not mentioned hitherto is that at the same time it is proposed to develop a new neighbourhood village at Saxmundham comprising 800 new homes and facilities. I ask how on earth is society going to cope with all this? How do communities sustain themselves? How on earth are local services and amenities going to service the expanding needs of increased housing and influx of construction workers? What are the implications for visitors seeking respite from their urban environments?

10. THE OPPORTUNITIES

Reject the proposals and build on the opportunities offered by the area and pursue the Government’s mission for greener and healthier lifestyles.

It is said that 12m visit East Suffolk each year which is testimony to the human need to have access to the natural environment.

This is further borne out by the increase in visitors and those interested in buying property as the attractions of urban life diminish and home working is more common.

The area remains a source of inspiration for writers, artists, craftsmen and composers. The legacy is sustained by Britten-Pears Arts at Aldeburgh (The Red House) and at Snape Maltings which is now recognised as an international centre for the arts. This has been a catalyst for other arts organizations and a year-round programme of festivals all enhancing cultural life.

SCHEDULE OF RELATED PROJECTS

Interested Party: Simon Ive

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Project Name	Sponsor	PINS Reference	Published references
East Anglia 1 North wind farm	Scottish Power Renewables	EN010077	DCO Application
East Anglia 2 wind farm	Scottish Power Renewables	EN010078	DCO Application
NGET Leiston 400kV Substation	National Grid	Part of EN010077 & EN010078	
Nautilus Interconnector	National Grid Ventures	Pre-Application	
Eurolink Interconnector	National Grid Ventures	TBA	
Sizewell B Relocation	EdF	N/A	
Reconductoring of Sizewell to Bramford OHLs	National Grid	NA	
Sizewell C Nuclear Power Station	EdF	EN010012	
Greater Gabbard Extension wind farm	North Falls	TBA	
Galloper Extension wind farm	Five Estuaries	TBA	
SCD1 Interconnector	National Grid	TBA	

SCD2 Interconnector	National Grid	TBA
Other projects targeting "Sizewell"	TBA	TBA

