



Dear Mr Smith and examining team,

We are residents of Friston, our cottage on [REDACTED] is approximately 500m from the boundary of the proposed substation site at Grove Wood. **We agree with and fully endorse the views and arguments of SASES & Friston Parish council, SEAS, our MP Therese Coffey and both local authorities**, who all consider 'onshore development' proposals for EA1N & EA2; cable landing zone, cable route and proposed substation site at Grove Wood, Friston to be unacceptable.

Personally, we cannot accept the Friston location for substations as it shows a complete disregard for our human rights and the human rights of fellow residents living in Friston, whereby we will be subjected to an unacceptable increased risk of flooding. For those living in the closest properties, like ours, the prospect of constant 'anti-social' background noise from the substations and grid connection equipment. The character of Friston village as you approach along Grove Road to the north, will be destroyed by the oppressive size and visual obtrusion of multiple substations, worse than a large industrial estate with buildings and other paraphernalia up to 18 metres possibly higher. Onshore proposals for these DCOs should be rejected as they represent hugely damaging and completely inappropriate industrial development, next to a peaceful village in the countryside (notably in the name of so called 'green energy'). If construction is permitted the development will impact on the daily lives of Friston residents, our physical health, mental health & wellbeing. These proposals represent an unquestionable blight on our village and homes.

We would ask the examining team to seek answers to our questions and those based on the evidence put forward by others, working groups like SASES and by the appointed experts also contributing to these examinations.

What these proposals outline is only the start as they seek to create a '**strategic connection point**' at Grove Wood Friston, a facility that National Grid plan to exploit over and over again for future projects. An email sent on 9/3/2020 to The Planning Inspectorate from Alicia Dawson - Contract Consents Officer for National Grid Ventures states:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-001723-National%20Grid%20Ventures.pdf>

"...NGV are seeking to ensure the substation is future proofed for other future developments, namely the proposed Nautilus and Eurolink Interconnector projects."

This single statement proves the fears of local communities and businesses, that these DCO proposals are much more than they seem, in fact these plans are National Grids 'Trojan Horse'. The dubious nature of National Grids approach to achieving this 'Strategic connection point' asks legitimate questions whether this is not circumventing planning procedure to achieve planning by stealth?

We believe these DCOs push the boundaries of the Rochdale envelope and abuse the case for flexibility by failing to provide key details and data to enable these DCOs to be considered accurately or fairly. The lack of key information regarding local, environmental and cumulative impact of these proposals and assessment of what is planned in addition to these proposals is inexcusable. We would even go as far as to say these DCO applications and the supporting materials are a guide or benchmark for failure.

Need for Project

No one can argue that the merits of offshore energy are good for the nation, but offshore wind must not be pursued at any cost. Scottish Power and National Grids proposals are ill-conceived and fail to show due diligence has been carried out for these NSIP proposals, notably not a single 'brownfield' location was considered for onshore development/grid connection for EA1N & EA2 – **Which could be argued as grounds alone to reject these DCO proposals. Why did Scottish Power & National Grid fail to provide a proper assessment of viable alternatives including brownfield sites for these projects?**

It is now clear EA1N & EA2 projects could and should have connected to the grid at Bramford via the Bawdsey to Bramford cable route. There should be no need for EA1N & EA2 to require their own cable routes or substations. Bramford is only connecting around 2 GW, less than 1/3 of the consented capacity of 7.2GW. It is failure like this and the lack of accountability that has resulted in Suffolk residents relabelling 'Green' energy as 'Damaging & Dirty' energy. Our communities and businesses will not tolerate what is becoming a systematic destruction of our AONB, our coastline and countryside in order to achieve so called 'net zero' carbon by 2030.

Site Selection & Consultation

Onshore development, specifically substations and grid connections are permanent features of these projects, representing the biggest impact on the landscape, on local communities and people's lives. The flawed work carried out by Scottish Power to identify and select an onshore site further illustrates National Grid & SPRs desire to secure Grove Wood as a 'strategic connection point'.

- Scoping and site selection for onshore cable route and substations was largely desk based, showing insufficient 'on the ground' knowledge of the local countryside and demographic.
- RAG assessments & methodology used to consider the 5-6 proposed substation locations appeared to have been manipulated to achieve the outcome that Scottish Power & National Grid desired. 3 of the sites chosen for assessment were located within the AONB and were discounted right from the outset, effectively SPR only really committed to 3 potentially viable locations in site selection. In the case of the Grove Wood Friston SPR failed to provide fair and transparent scoring, this was highlighted on work carried out by SASES who reworked RAG with accurate 'fair' scoring and found the Grove Wood site should have been dismissed. Due to issues surrounding proximity to surrounding property, proximity to heritage features, flood issues amongst other discrepancies.
- SOCC advertisements published in media and online, failed to mention any requirement for 35 – 50 acres of permanent onshore industrial development. In fact, there was NO mention whatsoever of onshore development on the advertisements.
- The SOCC Document published March 2018 only touched on onshore elements by referring to new 'substation/s' but provided no details (ie. that these proposals would require 3 huge substations, a mix of industrial buildings and unsightly grid connection equipment, there were NO images & NO diagrams of onshore infrastructure provided).

- Consultation was woeful, there was lack of adequate local publicity. SPR relabelled consultation events as 'PIDs' (Public Information Days), a clear sign they had no intention of transparent consultation, these events were merely box ticking information events. SPRs representatives at these events failed to answer important questions about proposals and often increased local confusion about what was being proposed, with answers including "we will get back to you", "more information will be coming" and in the case of NG infrastructure "we don't have many details about that." **Is this acceptable?**
- National Grid's presence was non-existent in consultation and throughout.
- Maps and diagrams provided at PIDs and those submitted within these DCO documents mostly cut off the village of Friston, it's as if we don't exist, we are of no concern or importance in Scottish Power & National Grid's bigger picture for East Suffolk. Surely these tactics were used to play down the size of the development and its proximity to Friston village and homes.
- [EA1N-DWF-ENV-REP-IBR-000366 Cumulative ZTV \(EA1N & NG with EA2\)](#) / Cumulative ZTV (EA2 & NG with EA1N) show the substations will be 'theoretically visible' in the landscape as far as Saxmundham, Knodishall, Leiston, Sternfield, Kelsale, and possibly over distances of over 5+km

Noise & Visual Impact (Substations)

Noise and visual impact are very troublesome for those who might be subjected to living next to 3 huge substations. There are serious concerns about suspect noise information and measurements provided in these DCO applications. SASES & noise experts will explain better than we can, however we would like to point out a clear example of misinformation:

SPR identified an existing NG substation at Bramford as a 'noise feature' in their Scoping Report for 'EA3' DCO (page 273 | number 693) (https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010056/EN010056-000205-121113_EN010056_Scoping%20Report.pdf)

"...At night the existing Bramford substation is an existing noise feature in the area."

In complete contradiction Scottish Power say a new National Grid substation to be built under these DCOs will not be a noise feature:

"...The equipment required at the National Grid substation for operation does not include components which would contribute any significant noise contributions in the area."

How is National Grid able to achieve a new substation & equipment that will be, 'of no significant noise' when Scottish Power described NG's Bramford substation as a noise feature in the area in their own EA3 DCO application?

If substations are built at Grove Wood there is potential that operational noise and visual impacts will be much more noticeable at nearby properties because these DCOs fail to consider and embed effective mitigation within the design.

OLMP General Arrangement EA1N-DWF-ENV-REP-IBR-000366 illustrates clear failure in design and failure to embed mitigation elements into design:

- Poor existing screening & sound buffering
- Rudimentary narrow bands of tree planting on the southern boundaries.
- Woefully insufficient planting to the north of the proposed substation site, just grasses.
- There is no proposal to dig the substations into the landscape.
- There is no provision for: banking/bunding around the whole site perimeter.
- There is no proposal to use noise reducing perimeter panelling or similar sound barriers.
- As highlighted previously, the DOC submissions even show that substations will be 'theoretically visible' for many Km.

Of equal importance is the conspicuous 250m buffer zone that SPR agreed with local authorities, in comparison SPR provided a much more generous 600m buffer zone from neighbouring properties under proposals for substations for EA3 & EA1 built at Bramford – Why and how is this acceptable?

This is further evidence of a lack of concern for the health and wellbeing of residents here. It illustrates the constraints of the Grove Wood location and poor design. SPR fail to achieve any level of improvement or even parity in how they approach, design and run their own projects. It certainly does not show application of NPS EN1 4.5.2 or any attempt to improve on what has come before:

4.5.2 Good design is also a means by which many policy objectives in the NPS can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies can help mitigate adverse impacts such as noise.

We would ask examining team to explore the following:

- Scottish Power needs to independently prove the true noise level of all 3 substations in operation in dB against what is permissible. We are aware East Suffolk authority and SASES have instructed independent experts to look at specific noise issues, their findings will make it clear SPRs noise work is disputable.
- Noise emitted at Bramford is loud and noticeable, SPR have only allowed for a 250m buffer for EA1N & EA2 substations and they have failed to embed effective visual and noise barriers in design.
- At Friston there is no existing grid connection it is a green field site, so surely a buffer of at least 600m should be sought if only to provide some sort of fairness.
- Scottish Power need to explain why no tonal penalty is applied for EA1N, EA2 & NG substations when this is the accepted norm and was the case for their own developments at Bramford.
- Friston residents must have assurances that noise levels will not be an annoyance during the day or night in accordance with NPS EN1 4.14 – Common Law Nuisance & Statutory Nuisance
- Friston residents must have necessary assurances that lighting/ temporary lighting will not be an annoyance at night at substations or from any construction machinery in accordance with NPS EN1 4.14 – Common Law Nuisance & Statutory Nuisance
- In accordance with NPS EN1 5.11.10 - If these DCO's move forward, we hope the Planning Inspectorate seeks a commitment from Scottish Power to provide every residence within 0 – 600m with individual noise receptor measurements of background noise pre-build, and measurements of operational noise post build. Scottish Power should assist residents by confirming noise output remains within agreed levels and provide residents the means to raise noise abatement orders effectively.

Cumulative Impact

Scottish Power's DCO application documents only touch on Cumulative Impact. SPR attempts to try and get away with touching on the interactions of EA1N, EA2 and NGs Substation. There is virtually no assessment with other projects. SPR say there is not enough information however this is not true. SASES have uncovered that National Grid has provided up to 5 other connection offers at Grove Wood, Friston and details of the Sizewell C DCO are in the public domain.

At the very least SPR & National Grid between them should have enough knowledge of other proposals to provide a fair cumulative assessment, SASES & SOS have managed to create timelines and maps to illustrate some of the impact visually/graphically.

Annex A - A graph by Paul Chandler of SOS shows a construction timeline of proposed projects

It is clear dates provided for these projects shows considerable crossover with peak activity 2026 – 2031

Annex B – A map by SASES shows just 5 energy proposals and the effect locally on the ground

Cumulative impacts are too important to be overlooked, they are far reaching for communities and businesses in the local area, so a full assessment is urgently required to look at:

- Roads and access – The A12 mostly single carriage and the small country roads and lanes ability to cope with projects in construction together and at times of peak flow and during holiday periods.
- Nuclear Emergency and other evacuations – contingency 'what if' scenarios have not been considered; this represents a real risk to life.
- Accessibility to and from the area for ambulances and other emergency vehicles, the nearest hospitals are in Ipswich and Lowestoft 25+ miles away, issues on the roads and their ability to cope could mean life or death for stroke, heart attack and other life-threatening emergencies.
- Effects on landscape and accessibility to the AONB, coast and countryside:
 - Road closures
 - Closure of footpaths, tracks and other PRoW in and around the AONB and surrounding countryside.
 - Sustainability of local tourism, cumulative effect of energy projects and construction on businesses heavily reliant on accessibility of an AONB and countryside increasingly out of bounds.
 - Growing visitor perception that the whole area is becoming a big industrial building site.
- Scrutiny of National Grids work, CION assessments, with public disclosure of how NG justify the many grid connection offers they are making in the local area/AONB.

Water Resources & Flood Risk

NPS EN1 states developers should:

5.7.3 ensure that flood risk from all sources of flooding is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk. Where new energy infrastructure is, exceptionally, necessary in such areas, policy aims to make it safe without increasing flood risk elsewhere and, where possible, by reducing flood risk overall."

and

*5.7.5 The minimum requirements for FRAs are that they should: • be proportionate to the risk and appropriate to the scale, nature and location of the project; • **consider the risk of flooding arising from the project** in addition to the risk of flooding to the project;*

It is our belief that Grove Wood should not have been considered for substations, the site is a sloping basin and this land is the major cause of historical flooding in Friston due to surface water run-off. Residents have consistently raised concerns about flood issues and the potential for this development to increase flood risk to local homes and property. We live around 500m from the site and we remain deeply concerned these proposals will exacerbate flooding due to the large impermeable concrete footprint of substations. Suffolk County Council recently carried out an emergency survey due to bad flooding in 2019, it appears this work was unable to account for Scottish Powers proposed development as they haven't provided essential details other than they propose to collect run-off and manage release into the Friston water course/drain.

The issue is how will the water be managed? How do proposals address the existing issues and improve upon current issues?

NPS EN1 5.7.3 - Given that the Grove Wood site is already compromised surely Scottish Power should facilitate a full & concise independently approved Hydro-Fluvial Assessment. These DCOs do not contain sufficient details to confirm this location is safe or that their plans can mitigate, improve or reduce flood risk overall. SPR & National Grid are supposed to put forward proposals that are sustainable, durable adaptable & provide enhanced or better.

If the location is in fact considered inappropriate Scottish Power & National Grid should be asked to return to site selection to find an appropriate location for substations (i.e. not next to a village just metres from homes).

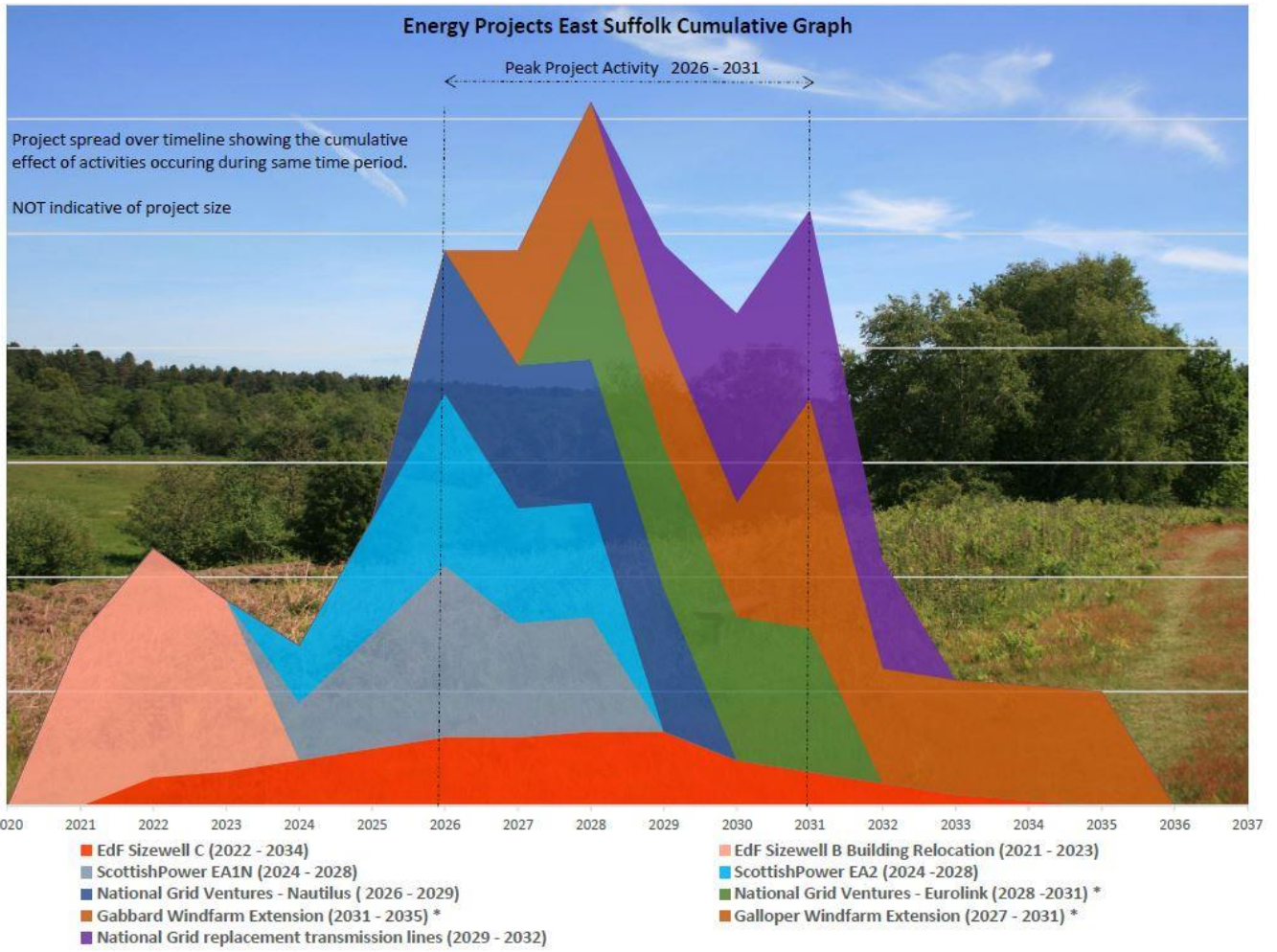
We were born here and grew up in Suffolk. We both care deeply about this part of the Suffolk Coast & hope that these examinations will expose the failure of big energy companies to consider the full impact of their plans and actions. NSIPs are important but should not be used as a means of circumvent planning procedure with an expectation that they should always get the go-ahead. It is clear from what we are learning that energy proposals here are running out of control, uncoordinated with growing potential to cause serious damage to the AONB, countryside, communities and businesses. We hope that these examinations can evoke the change needed to facilitate effective planning and coordination, so offshore energy developments can connect in a considerate and sustainable way.

Written Representations:

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Annex B Energy Projects East Suffolk Graph (Paul Chandler SOS - Feb 2020)



data date Feb 2020

* a number of assumptions have been made due to lack of information but based on similar projects

compiled by Paul Chandler

Annex C East Suffolk Cumulative Impact Map (SASES – 2019)

