Offshore Wind Farms

EAST ANGLIA ONE NORTH PINS Ref:EN010077

&

EAST ANGLIA TWO PINS Ref: EN010078

ExQs1

response from

Save Our Sandlings

Registered Nos. **EA1N 20024845**

EA2 20024842

Preface.

"Save Our Sandlings was formed to respond to proposals to site the substation in the Broom Covert AONB and the Thorpeness cliff site selection, and continues to campaign against the latter and 11Km cable route to now proposed substation site at Friston. We are primarily non-technical local residents who have studied long and hard the applicant's documents and Planning Inspectorate guidance as indicated and are responding in accordance with our best interpretations of the contents therein. Many of our campaign members felt compelled to abandon their retirement and become full-time unpaid consultees, yet do not claim to have any expertise in planning law or its many requirements and ask the examining committee to accept that our responses to the questions posed are provided as accurate and honest, to the best of our ability, with supporting evidence where available. Many hours are spent reviewing the highly technical documents presented and interpreting the merits and ramifications these projects pose to our communities.

Responses.

ExQs 1	Question to			Question
1.0	**Overarching, general and cross-topic questions**			
1.0.3	The Applicant, East Suffolk Council (ESC), Suffolk County Council (SCC), Historic England, Natural England, AONB Board, Parish Councils, SASES, SEAS, SEAS, SoS	1	2	**Design Mitigation: Adverse effects** Are the measures set out in section 6.7 of the Environmental Statements (ES) (Onshore Schedule of Mitigation) sufficient to mitigate any adverse effects from the proposed substations and National Grid substation and enable the projects to satisfy the requirements of EN-1, the NPPF and local policies for visual amenity, landscape, public rights of way and heritage matters? a) Provide reasons for your answer. b) If not, what further measures are required?
	We contend that these applications does not pay sufficient regard to impact mitigation in respect of the visual amenity, landscape, public rights of way and heritage. The Suffolk Sandlings is a special area of lowland heath within the Suffolk Coast & Heaths Area of Outstanding Natural Beauty, (SC&H AONB)[1] covering 403 sq. Km and is a relatively narrow strip of coastal land from Ipswich to Lowestoft. The AONB can almost be considered in two halves as the land narrows considerably at Leiston cum Sizewell as it threads its way past the now heavily industrialised area at Sizewell. Additional large constructions will cause sever impacts not only to the wildlife and ecology of the area, but also to the visual appeal of the area as a whole. The Suffolk AONB is a special place[2] and is widely known as an area of tranquility, with many footpaths, bridleways and PROWS used by visitors and the local community for recreation and exercise. Since the first Covid-19 national lockdown, and subsequent easing of restrictions, a noticeable increase in numbers can be seen using these byways each day. The peace and tranquillity that make this area so special will be lost. On the subject of the substation site, we fail to understand how any mitigation will be sufficient to offset the huge visual impact a complex of this size will have on the small medieval village of Friston, completely dwarfing local properties and the church of St. Mary the Virgin. We agree and endorse the detailed representations made by SASES and many others in rejecting these proposals and questioning how a project of this size was ever conceived as appropriate for this location. Public rights of way established over centuries will be diverted or removed from public access. No amount of tree planting can ever disguise the extent of the complex. .			
1.0.4	The Applicant, ESC, SCC, Historic England, Natural England, AONB Board, Parish Councils, SASES, SEAS, SEAS, SoS	1	2	**Design Mitigation: Adverse effects - AONB** Is sufficient weight given to the statutory purpose and need for protection of the landscape, character and special qualities of the Suffolk Coast and Heaths AONB both within and from outside its boundary, in accordance with paragraphs 5.9.9 and 5.9.12 of EN-1? a) Provide reasons for your answer. b) If not, what further measures are required?
	We are concerned of the impact these applications will have on the wildlife and ecology of the area from cable landfall site to the substations end point. The cable trenching operation will bisect natural foraging and transit pathways used by many species. The most notable, in size is the red deer herd, our biggest land mammal. The herd ranges far and wide across this area and a ground inspection will reveal, their tracks and activity can be seen all over the Thorpeness – Leiston – Sizewell area. The herd is also 'reported' to be a purer strain than many Highland herds, no inter-breeding with other species, i.e. roe deer, has taken place. But there are numerous other species just as important present, many of whom are inter-dependent on each other. Apart from fox and rabbit, there are reports of badger, otter, stoat, weasel, field mice, adder as well as multiple bird species[3] [4]. Some are resident, some transit through, especially a number of bird species. The Suffolk coast is the first and last port of call for many migrating bird species, similar to a motorway service station, as they stop for rest and refuel before continuing their journey. Crops and grassland are vitally important for their survival. The fields in the area are a mixture of land under crop management to open heath and provide a source of food and natural cover. Removing this land availability, even temporarily during construction will deprive many species of habitat, food and security from predation.			

[1] SC&H Management Plan 2018 -2023

[2] Natural Beauty and Special Qualities of the Suffolk Coast and Heath

[3] Appendix 23.3 Breeding Bird Survey

[4] Appendix 23.4 Non-Breeding Bird Survey

	Visuals produced in support of the application attempt to show how trees will screen the village from the construction, but this area can also be seen from the A1094 and B1069; the screen of trees will be inadequate to effectively disguise this blot on the landscape. These plans show a careless and callous disregard to the wishes and feeling of communities of East Suffolk, and Friston in particular, and has led to many feeling helpless and distressed at these proceedings. We are mindful of the role of National Grid ESO in all of this. Had a discussion with National and local planning authorities taken place, including local community consultation at the early stages, outlining the need for additional connection capacity to the Sizewell to Bramford 400 Kv line, we are certain plans would have been rejected as completely unsuitable for consideration in an area of AONB. The initial consultations presented 7 sites for the substations, none of which had any merit or benefit to the area. Consultees were asked to choose the least worst option. A brownfield site should always take a higher priority than open greenfield and agricultural land, especially in the case of AONB which is supposed to have the highest protection in the land. Should these applications proceed, it sets an extremely dangerous precedent for any future development applications on, or adjacent AONBs. There are better solutions available; they are in use now by other energy providers in other countries. Suffolk and the UK deserve better			
1.0.8	The Applicant, ESC, SCC, Historic England, Natural England, AONB Board, Parish Councils, SASES, SEAS, SEAS, SoS	1	2	**Design Principles** a) In the context of EN-1 paragraph 4.5.5, explain how the design of the EA1N and EA2 projects meet the National Infrastructure Commission's Design Principles for National Infrastructure (February 2020) in respect of Climate, Places, People and Value, both offshore and onshore and in all three phases of construction, operation and decommissioning. b) Comment on the desirability of implementing the following measures to ensure that good quality sustainable design and integration of the proposed substations and National Grid substation projects into the landscape is achieved in the detailed design, construction and operation of the projects. How might they be secured? Are any further measures appropriate? i) A 'design champion' to advise on the quality of sustainable design and the spatial integration of energy infrastructure structures, buildings, compounds, security fences, landscape, heritage, woodland, new landscape features, public rights of way and visual amenity. ii) A 'design review panel' to provide informed 'critical-friend' comment on the developing sustainable design proposals; iii) An approved 'design code' or 'design approach document' (as approved in the Hinkley Point C Connector Project (EN020001)) to set out the approach to delivering the detailed design specifications to achieve good quality sustainable design; iv) An outline, including timeline, of the proposed design process, including consultation with stakeholders and a list of proposed consultees. v) In the opinion of the local authorities and other statutory agencies, would the implementation of any or all of the above measures assist in determining post-consent approvals (including the discharge of requirements) in relation to achieving good design?
	In its current configuration, the onshore substation structures are too large for the environment where they will be built and have a detrimental effect upon the lives and well-being of communities in the immediate area. Placing an extremely large industrial complex into a small rural village community is completely the wrong location. Buildings and industrial equipment of this size and complexity should be located on brownfield sites and not result in the removal of productive agricultural land, and green spaces enjoyed by local residents and visitors alike. Fencing off vast areas will also drastically affect wildlife populations that rely on free-access across these open spaces for foraging, shelter and transit through the area. The area will be permanently disfigured by these projects. The wishes of local people have not been properly addressed and objections to proposals not sufficiently accepted or mitigated.			
1.0.18	SCC, ESC, Parish Councils, SASES, SEAS, SEAS, SoS	1	2	**Site selection**: Friston grid connection point To the extent that it was suggested at OFHs 1 – 2 that there may be additional grid connection proposals for this location, please catalogue any additional connection offers of which you are aware that have been made on a formal or informal basis and submit the best available summary descriptions of the name, purpose, developer and effects of any additional connection proposals that might use this location.
	The design as presented by the applicant fails to meet the National Infrastructure Commission's Design Principles for National Infrastructure (February 2020) in respect of Places, and People and an independent review of the proposed infrastructure must be held. It is our belief that if National Grid decision to site such a large substation complex in any of the seven proposed locations had been subject to examination and review prior to the applicant being offered a connection, the examining committee would decide the proposal is not only in completely the wrong area, but far too large for a rural location, and that brownfield sites should be investigated as a priority. This is even more relevant now that additional connection points have been offered to other energy providers. The decision to site the substation in the Sizewell / Leiston area has been made on purely commercial grounds with no regard to local communities or the environment. National Grid have failed to engage with local communities, opting to hide in the background and expect developers to work out the details. Failure of National Grid to engage properly has led to the current state of affairs. Proposals of this magnitude will never be acceptable to the local communities, and each and every subsequent NSIP application will be met with similar opposition and dismay. The problem will only get worse, especially as the relentless juggernaut of energy projects is set to continue for the foreseeable future. The proposal to bring cables ashore at the fragile Thorpeness cliffs have not been sufficiently explored by the applicant. These cliffs have a history of instability and have resulted in the unfortunate death in January 2017[5]. Each year the cliffs and shoreline suffer erosion during winter storm surges prompting the local council to respond[6]. EADT			

[5] East Anglian Daily Times 16th January 2017
[6] East Anglian Daily times 14th July 2019

1.14. Other Projects and Proposals

1.14.5	SCC, ESC, SASES, SEAS, SoS, Parish Councils and other Interested Parties	1	2	**Relevant projects and effects for cumulative impact assessment purposes: grid connections at Friston (OFHs 1 – 3, 7 – 9 October 2020)** Parties at OFHs 1 – 3 raised a range of grid connection proposals potentially making use of the National Grid substation proposed to be constructed at Friston. If you have already responded to ExQ1.0 and/ or ExQ1.6 questions on these issues and provided a complete list of projects in response, this question does not need to be responded to. However, if you have not responded to those questions or your response does not include a complete list of projects that you are aware of and consider to be relevant, please set out a full list and identify the public information source(s) from which you have made your assessment.

Significant projects in the Sizewell Area

Project	Consultation	Start Date	Finish Date
• EdF Sizewell C Stage 3 consultation	Jan 2019 [i] completed	2022	2035 ?
• EdF Sizewell B building relocation / Carpark creation	Jan 2019 [ii] completed	2021	2022
• ScottishPower EA1N	Feb 2019 completed	2024	2028 [iii]
• ScottishPower EA2	Feb 2019 completed	2024	2028
• National Grid Ventures - Nautilus	2021 ?	?	2027
• National Grid Ventures - Eurolink	2021 ?	?	2030
• Greater Gabbard Windfarm extension (North Falls)[7] [8] [9]	? [iv]	2025?	2031 ?
• Galloper Windfarm extension (Five Esturies)	? [4]	2025?	2031 ?
• National Grid reconductoring of 400Kv overhead lines		?	2027
• National Grid Interconnector Sizewell to Kent SCD1[10] [11] [12]			2028
• National Grid Interconnector Sizewell to Kent SCD2			?

Source: National Grid COIN Process Connection Assessment Note

[i] DCO submitted but changes submitted to Traffic and Transport Sept/Oct 2020 –further consultation needed
[ii] Subject to judicial Review Oct 2020
[iii] Assuming scenario One EA2 and EA1N simultaneous otherwise EA1N will start after EA2 completed
[iv] RWE/SSE consortium established Sept 2020. No consultation dates identified –likely in the next 5 – 10 yrs

The above projects are in addition to 3 completed major projects in Sizewell area since the early 2000's namely:
a) Greater Gabbard Offshore windfarm
b) Galloper Offshore windfarm
c) EdF Nuclear Dry Fuel Store

[7] SSE &RWE secure crown estate lease for greater gabbard extension
[8] RWE develops uk offshore wind farm extensions projects
[9] RWE and SSE join forces for Greater Gabbard extension
[10] EADT-National Grid proposed Suffolk to Kent transmission route
[11] National Grid ESO Early Competition Plan
[12] National Grid ESO NOA report 2019

1.14.6	All Interested Parties	1	2	**Relevant projects and effects for cumulative impact assessment purposes: other projects** Are there any other projects that are not documented in the ES and are not grid connection projects at Friston (ExQ1.14.5) that are relevant and need to be considered by the ExA? • Please identify these projects and identify the public information source(s) from which you have made your assessment that they are relevant

The area is also witnessing significant housebuilding programs in Leiston, Aldringham, Thorpeness, Saxmundham, Wickham Market and Woodbridge and most significantly at Martlesham, Ipswich (i.e., towns along the A12 corridor) with the accompanying HGV / LGV and contractor vehicles. These programs also necessitate substantial road closures, diversions and restrictions as new services are connected to these projects.

Application ref.	Description	Road affected
DC/20/3906/AME	Johnsons Farm 187 dwellings	B1119
DC/20/3285/CWH	40 dwellings	B1122
DC/20/1233/VOC	Martlesham Heath 2000 dwellings	A12
DC/20/2678/DRC	180 dwellings	A12
DC/20/3361/FUL	Pettistree/Wickham Market 129 dwellings	A12

Source: East Suffolk Planning applications

Of all of the above new house build programs, the 2000 new homes at Martlesham Heath to the east of BT Adastral Park, Ipswich will have the most significant direct impact on the A12. Already experiencing high road use at each end of the day with the existing large housing estate to the west, and BT Research and light industrial enterprises to the east, and a major Tesco supermarket between, road traffic is heavy at all times during the working day. Access/egress from these two areas is via 2 roundabouts. Plans have been submitted to establish an additional roundabout with associated slip roads onto the A12 south of the two existing roundabouts. Construction of these will naturally cause further disruption to traffic flow. The A12 is the main trunk road to North Suffolk and Lowestoft and Great Yarmouth for road going freight, connecting with the A14 at Seven Hills, South of Ipswich and is popular with holiday makers and tourists travelling north and south for most months of the year.
The A12 north of Woodbridge is a mixture of dual and single carriageway, mostly single, leading to long tailbacks throughout the day, especially during summer, Bank Holidays, half-term and warm sunny week-ends. Additional slower moving HGV project traffic sharing road space with caravans and motorhomes will further increase the tailbacks and gridlock. The 2 SPR projects combined with the construction traffic for Sizewell C will undoubtedly place a huge strain on the road network leading to road users exploring alternative unsuitable rural routes and 'rat runs' to get around the problem
Improvements to this section of the A12, (the Four Villages Bypass) have been shelved for very many years and the road network is struggling to cope with the existing traffic volume let alone future demand, especially following the surge in housebuilding along this major road, and more families move away from large towns and cities to sample the rural lifestyle. We have become victims of our own success in promoting Suffolk as a nice place to live.
More information on Suffolk Roads studies can be found here:
https://www.suffolk.gov.uk/roads-and-transport/transport-planning/consultations-and-studies/
See *Suffolk Energy Gateway*
and https://roadtrafficstats.uk/traffic-statistics-suffolk-a12-kelsale-cum-carlton-48586#.X5IaJUdxcUQ
A12, Kelsale cum Carlton, Suffolk (census between A1094 and A1120)

There are plans for a two villages bypassonly, Farnham and Stratford St. Andrew, 2 adjoining villages just south of the A1094, partially funded by EdF as mitigation for Sizewell C. East Suffolk Council and EdF are reluctant to provide sufficient funds for all four villages, and inward government investment has been refused.

There is also an ongoing rolling programme of broadband network improvement for rural Suffolk communities with accompanying restrictions and closures on all of the road network as work progresses. Diversions of many miles are not an uncommon feature of road closures leading to high volumes of traffic travelling along narrow and/or usually very quiet roads.

Additional links
EADT Energy Impact rethink call
EADT Dr Therese Coffey MP - windpower - nuclear projects impact meeting