

Dear Mr Smith

**EA1N and EA2 - 004**

Thank you for giving Wardens Trust the opportunity of a written submission at Deadline 5.

I write as Chairman of the Trust with the unanimous agreement of our Trustees.

We are a charity founded over 30 years ago, based in a large building, Wardens Hall, on the cliffs next to [REDACTED], just north of the proposed transmission cable landfall on the Ness.



Our Charity's mission statement is:

To help people who have mental and or physical disabilities to lead fulfilled and creative lives within their families and wider communities, improving their quality of life.

Trustees have discussed Scottish Power Renewables' (SPR) proposal a number of times. They are a sober group of people not prone to hyperbole but their view is unanimous.

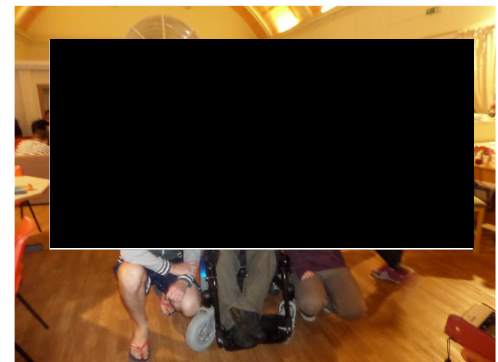
This proposal in its current form is an existential threat to this charity.

In 2018 Wardens Trust welcomed 2406 individuals through our doors, and in 2019 2634 children and adults came to our centre for our services and facilities.

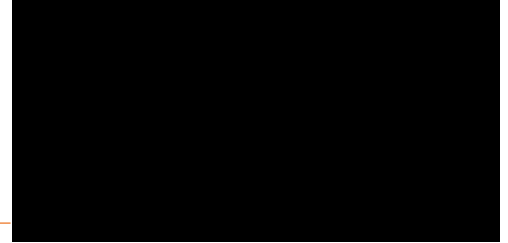
Let me explain why Trustees have come to their conclusion.

**1. What we do and how it will be impacted by this development**

- 1.1.** Each year Wardens Trust is visited by Children's groups such as the Big Kid Foundation, Paddington schools Children's Trust bringing children from London who are at risk of school exclusion and gang culture for camping and personal leadership development courses. KidzGoWild and MovieCamps bring children with neuro-developmental issues<sup>1</sup> for a week of camping music and film making. Other groups bring children with learning difficulties, severe behavioural problems, autism for recreational camping from residential



<sup>1</sup> Permission for photo has been given.



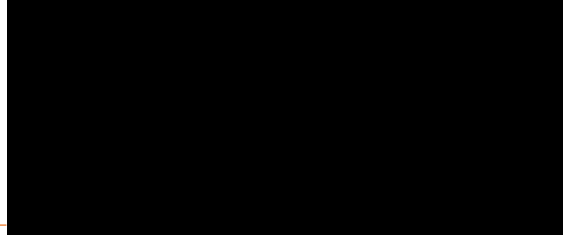
homes. These children all have health, mental health and/or behavioural issues and all groups require high levels of adult supervision. Careful risk assessment is undertaken of all aspects of their stay. Having discussed this proposal in its current format with our clients they agree that this development would have a devastating impact on both the amenity value of the Trust's site and, crucially, safety of our site due to the close proximity of the fenced cable corridor. These groups have supported our comments here and the Trustees stance.

***This proposal will severely damage the amenity value and safety of our site for visiting children with mental and or physical disabilities.***

**1.2.** The Trust has furnished a brand new holiday flat for severely disabled individuals – The Avocet – with electric beds, hoists, specially fitted wheelchair accessible kitchen/cooker, wet-rooms and bath hoists. There is an enormous shortage of well-equipped holiday accommodation for the most severely disabled individuals in Suffolk. Individuals and their families come to The Avocet for rest, to relax in beautiful clifftop surroundings and the peace and tranquillity looking out to the west, the Margaret Wood, the Rye Grass Walks



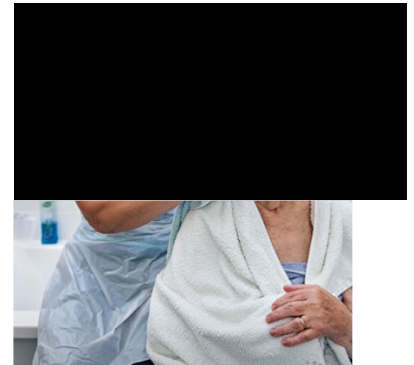
and Thorpe Went. If the proposal goes ahead the accommodation will look straight out over the proposed trenching works 100 yards away. Disabled people come to the flat because of the peace, quiet and the beautiful surrounding countryside. They do not come to look out over industrial fencing, trenchworks and disturbance of major ground engineering. They do not



come to see the light pollution, noise and dust that it is agreed inevitably accompany such a project.

***The proposal would dramatically reduce the viability and attractiveness of this holiday location for severely disabled people.***

**1.3.** Warden's Trust also delivers a range of services for frail and disabled elders, many with dementia. Wardens serves a local area with a surprisingly high prevalence of rural deprivation. Deprivation and loneliness have high prevalence in our immediate locality as described in the 2020 Suffolk Hidden Needs report (see appendix C). We offer a unique Bath Day for elders unable to access a bath in their own home<sup>2</sup>, lunch clubs, Music and the Brain singing days for people with Alzheimer's. In 2019 we partnered with professional musicians, singers and a composer over 12 weeks to develop a song cycle with local elders with dementia and their carers. We continue to partner with other organisations to pioneer new ways to address social isolation and loneliness in our locality (see appendix B).



***The proposal would significantly impact the amenity value of the Trust and its grounds for the duration of the works and result in a major interruption to the services for this vulnerable group.***

## **2. Our Trustees conclusion**

**2.1.** The proposed application in its current format has been discussed on a number of occasions. We have considered a range of options.

**2.1.1.** With the substantial impact described above, with a critical reduction in income, we considered suspending the charity for the duration of the project (36 months). We identified that our core costs related to maintaining the building and grounds could not be found from reserves so this would not be a viable option. It is also likely that further energy developments will follow SPR indicating that 'pausing' the charity is not a viable solution.

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<sup>2</sup> Permission for photos have been given



**2.1.2.** We have considered moving the charity to another site. This was also not considered a reasonable option as a major part of the Wardens brand was its unique site on a cliff next to the beach. Those are aspects of Wardens which have brought children and adult groups back to our site over the years and it is unreasonable to expect the charity to have move to accommodate SPR's proposal.

**2.1.3.** It is for the following reasons that Trustees object to the proposal in its current form.

- Impact on the amenity value of the charity's site
- Impact on safety for children visiting the site.
- Impact on income use of from Avocet flat for disabled people.
- The route comes deliberately closer to the Wardens site when other less intrusive routes are possible.
- The impact on Social Capital and resilience of the local area (section 3)
- The potential cumulative impact of a number of future applications which require a Cumulative Impact Assessment to be undertaken. (section 4)
- Fragility of water supply from Ness House property. (section 5)
- The impact on coastal erosion both north and south of the proposed landfall (section 6)
- We contest SPR's review of the impact of windfarm developments on local tourism.

### **3. The importance of Social Capital**

**3.1.** Social Capital is often referred to as "the networks of relationships among people who live and work in a particular society, enabling that society to function effectively". It involves the effective functioning of social groups through interpersonal relationships, a shared sense of identity, shared understandings, norms, values, trust, cooperation, and reciprocity. Social Capital is a measure of the value of resources, both tangible (public spaces, landscape, property) and intangible (e.g., actors, human capital, people), and the impact that these relationships have on the resources involved in each relationship, and on larger groups. It is generally seen as a form of capital that produces public goods for a common purpose.<sup>3</sup> Charitable activities are an important component of Social Capital.

**3.2.** In "Social Capital, Civil Society, and Development", political economist Francis Fukuyama<sup>4</sup> defines social capital as generally understood rules and relationships that

<sup>3</sup> [https://en.wikipedia.org/wiki/Social\\_capital](https://en.wikipedia.org/wiki/Social_capital)

<sup>4</sup> <https://www.tandfonline.com/doi/abs/10.1080/713701144>



enable people to cooperate and live together. He argues Social Capital is what produces a civil society. Damage to Social Capital limits society's ability to organize for public goods and welfare-enhancing activity.

**3.3.** Social Capital is but one of 5 types of Sustainable Capital from where we derive the goods and services we need to improve the quality of our and other's lives <sup>5</sup>. Financial capital is important, but we would respectfully argue should not dominate the other four (Natural, Human, Social and Manufactured Capital) when considering Planning Applications. The importance of Social Capital for public policy is also discussed here<sup>6</sup>.

**3.4.** Wardens Trust unashamedly speaks on behalf of those with mental and or physical disabilities who cannot, at such planning processes as this, speak for themselves and whose views are all too easily passed over by large corporate applications. How a locality addressed the deprivation and disadvantage of the most vulnerable in their society is a measure of that civil society's Social Capital.

**3.5.** Wardens Trust argues strongly that planning applications should take into account the impact of a proposal on Social Capital.

#### **4. Cumulative Impact of multiple developments – need for a Cumulative Impact**

##### **Assessment.**

4.1. Wardens Trust is aware that there are future proposals in the public domain which may wish to use a similar cable corridor to the proposed Friston substation. That would significantly prolong the duration of interruption to the amenity value of our site and the prospects of groups safely coming to visit us.

4.2. National Grid has announced proposals for the Nautilus Interconnector Project<sup>7</sup>

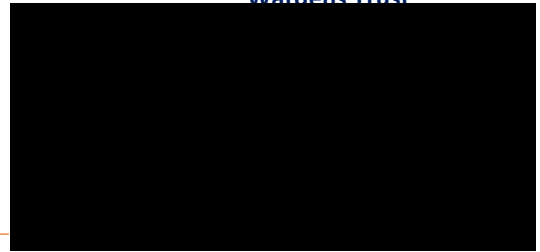
4.3. Potential routes C and D would cover exactly the same ground at the current SPR proposal. Trustees are also aware that the owners of the site which Wardens Hall is adjacent to, have received a request from National Grid for access to the fields in which SPR have also request early access for similar geotechnical excavations.

<sup>5</sup> <http://www.enablinguk.com/what-is-sustainable-development-communities-academic.htm>

<sup>6</sup> <https://www.tandfonline.com/doi/pdf/10.1080/10511482.1998.9521284>

<sup>7</sup> <https://www.nationalgrid.com/group/about-us/what-we-do/interconnectors-connecting-cleaner-future/nautilus-interconnector>





## Nautilus Interconnector

National Grid Interconnector Holdings is proposing to develop Nautilus, a second Interconnector between Belgium and Great Britain, to provide a 1.4 GW HVDC electricity link between the two countries.

Electricity provided by Nautilus will be transported under the North Sea via underground subsea cables which will be buried offshore at a point known as 'landfall' before connecting into an onshore converter station and the national grid. Potential high-level cable route options and various landfalls along the East Suffolk Coast are currently being assessed for Nautilus.

In order to connect Nautilus to the national grid, discussions have been ongoing with National Grid Electricity Transmission (NGET) and the System Operator. From this, NGET have provided a Connector Agreement to use a new 400 kV AC (kV) substation provisionally referred to as 'Leston 400kV substation'. This is the same substation that Scottish Power Renewables (SPR) offshore windfarm East Angles 1N and 2 are proposed to be linked to. NGET, SPR and NGET are currently working on the premise that all projects will be connecting to the same substation – 'Leston 400kV substation'.

Nautilus is currently at a very early stage of its development. Should consent be granted, a Final Investment Decision is planned for 2024. Following this, construction will commence, and the project could be operational by 2026.

**Design**

The design for the converter station has not yet been developed. A typical operational footprint for a converter station covers an area of five hectares (12 acres) with a maximum height of 24 metres. The exact size and height will depend upon the specific proposals for mitigation and construction.

The business is constantly challenging its supply chain to bring down the size of converters. The final design of the converter station will be developed through a thorough consultation process with stakeholders and the local community, as well as through collaboration with the supply chain.

### Key benefits

- Enough power for  
1.4 million homes
- 1.4 gigawatts (GW)  
of secure, sustainable energy for  
British consumers
- More interconnectors help  
the transition to a  
zero carbon future

## 5. Impact on a fragile water supply

5.1. Warden Hall has a water supply derived from the wellhead on Ness House property. This well has supplied water to Wardens Hall for all 30 years of the charity's existence. The Trust has a Business Continuity Plan where this water supply is identified as a potential risk to delivery of our services and therefore Trustees are rightly concerned at the prospect of interruption to the water supply which would prevent charitable services continuing on the site.

5.2. The water supply is regularly tested by Environmental Health October 2020 and the well was last reviewed by Veritas Water on 25<sup>th</sup> January 2021.

5.3. The Trust has been informed that the water level is 11.7 metres from ground level and the bottom of the well is at 13.1 metres. The aquifer is a network of underground channels and



therefore there remains a significant risk that directional drilling may pass through it. If the directional drilling is then routed out under the shoreline to come up to the sea bed there is a significant risk of saline backfill down the drill route into the aquifer contaminating the water supply to the 5 properties including Wardens Hall.

- 5.4. Interruption to the water supply due to breach in the integrity of the aquifer by test boreholes, trenchworks, or directional drilling would result in the Wardens Hall having to close immediately for children and vulnerable adults.

## **6. Impact on coastal erosion and lack of clarity concerning accuracy of directional drilling**

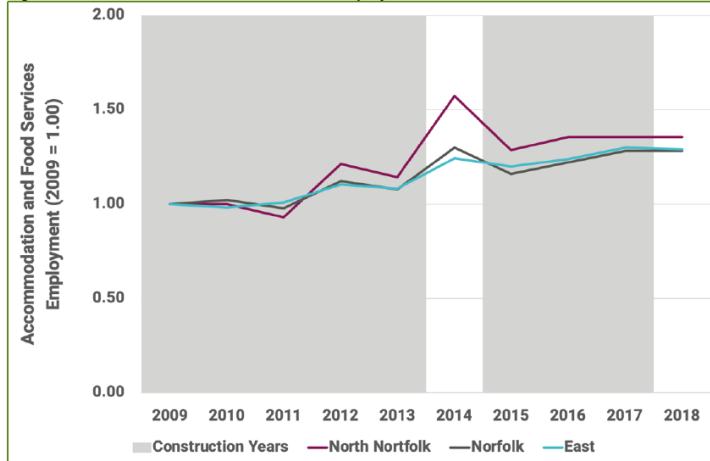
- 6.1. Trustees are anxious that there has not been due consideration to the impact on the fragile cliff structure, coralline crag and shoreline by the proposals in their current form. We are aware that others have also expressed their concerns include submissions from Save Our Sandlings, SEAS, SACES and the Alde and Ore Association and we strongly support their concerns.

## **7. Impact on Tourism**

- 7.1. Trustees are aware that SPR have presented evidence that windfarm developments do not impact tourism expenditure (SPR Reference: EA1N\_EA2-DWF-ENV-REP-IBR-001085\_0013), whereas both our discussions with clients and the report by Britten-Pears Arts come to a different conclusion.
- 7.2. Although the SPR report suggests that there may be a correlation between levels of employment in tourism and visitor numbers (and spend), that may be the case when visitor numbers are rising, but it is quite likely that is not the case when visitor numbers are falling. It is also likely that an analysis of district employment levels as undertaken in the SPR survey is inadequate to identify changes at a more local granular level. People may wish to go to Norfolk for a holiday but would avoid going specifically where construction was ongoing and visit somewhere else in Norfolk.
- 7.3. In the example of the projects in Figure 2-5 it clearly shows that in the one year when there was no construction 'accommodation and food services' employment went up, but then fell again when it restarted the following year. Construction clearly had an impact on tourism employment in that example.



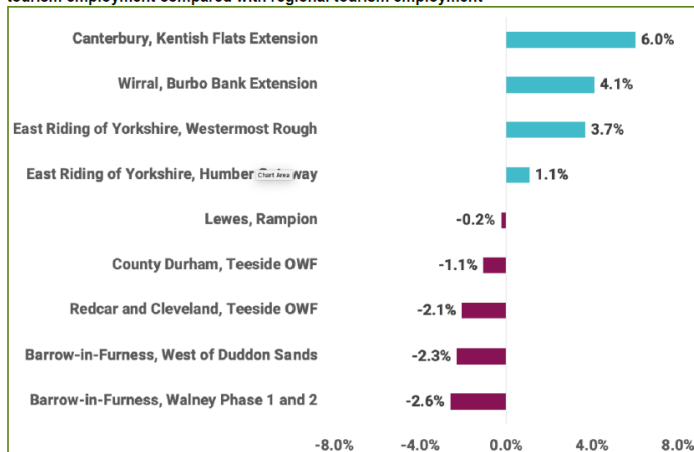
Figure 2-5 Accommodation & Food Services Employment, North Norfolk



Source: ONS, Business Registrar and Employment Survey

7.4. Figure 2-3 shows that in some areas tourism employment undoubtedly fell associated with a construction period, although in others it rose. The report is unable to distinguish between tourists and construction workers occupying tourist accommodation.

Figure 2-3 Regional Analysis of Tourism Employment during Construction Period, district tourism employment compared with regional tourism employment



Source: BiGGAR Economics Analysis

7.5. It would be wrong from this analysis to say that a construction period will have no impact. A more honest appraisal is that it is not possible to predict what the impact will be but a reduction in employment is as likely as an increase.

7.6. Use of consumer surveys of future intentions is a recognised tool across a wide range of sectors. We have no reason to disbelieve our clients who inform us that their future



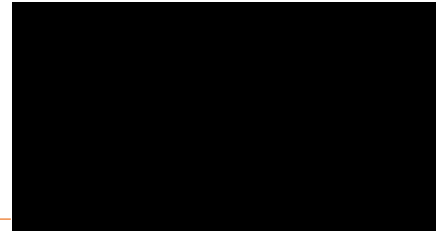


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intentions with respect to visits to our site with children will be adversely impacted by a risk assessment around the presence of a cable corridor and open trench.

**8. Lack of engagement**

**8.1.** It has been with some concern that Trustees have noted the surprising lack of engagement from SPR with Wardens Trust. No attempt has been made to reach out to an organisation that is trying to help the local community through difficult times. Trustees find that lack of immediate concern for the feelings of the local community both ominous and portentous.



The following appendices lay out in further detail Wardens Trusts' involvement with the local Community and details from the Hidden Needs report 2020 which some of our services are currently addressing.

**Appendix 1**

**Wardens Trust's Coronavirus pandemic response**

In this Coronavirus pandemic year Wardens Trust has had to adapt and change. In early 2020 we applied for and received grants from both Suffolk Community Foundation and The National Lottery Community Fund in order to deliver a Meals on Wheels service to local isolated and lonely residents adversely impacted by lock downs. We have delivered just short of 800 meals since April 2020.



A meals package purchased, prepared and cooked at Wardens Hall by Wardens Trust staff and volunteers

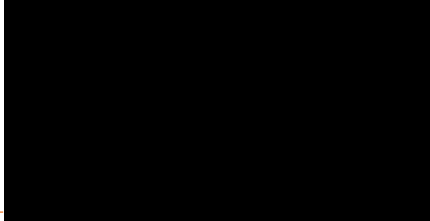
Wardens Trust staff delivering fresh and frozen meals to a local socially isolated individual in Leiston – May 2020



In addition, in combination with our 2 local Good Neighbourhood Schemes in Leiston and Saxmundham we sourced, prepared and cooked Christmas lunches for local elders and families in need. Led by Wardens Trust's House Manager a large group of volunteers gathered at Wardens Hall to prepare and pack a Christmas meal. On Christmas Eve and Christmas Day 200 meals were delivered. Theresa Coffey, our local MP, joined us on the day in Saxmundham.

Our charity is a fundamental part of the local community resilience and Social Capital.





## Appendix B

### Wardens Trust’s ongoing coronavirus pandemic response

For many years Wardens Trust has delivered arts-based projects to help reduce social isolation and loneliness for isolated elders with dementia, living in the community with their carers. This has included collaborations with English Touring Opera and Turtle Key Arts. In 2018 we developed a song-cycle with ETO professional musicians, singers, a composer and local residents with dementia.

Our ongoing response to the Coronavirus pandemic includes a collaboration with a local Arts Production company Wonderful Beast to deliver on-line arts based session to isolated members of the local community called Bubble Wrap and funded by the Arts Council of Great Britain, Pargiter Trust, Scarfe Foundation and Suffolk Community Foundation.

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- Free your mind from the confines of Covid
- Meet new people
- Enjoy being entertained with music, verse, stories and dance
- Create something wonderful together with our friendly artists

**FEBRUARY & MARCH 2021**

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## THE ARTISTS INVOLVED...

**DEAN PARKIN**

A writer and poet who lives in Suffolk. He runs workshops for all ages – from primary school children to the over-nineties. He performs at festivals, venues and schools across the UK, and is the first poet to have appeared on BBC One performing a poem on the loo.

**HILARY GREATOREX**

An actor and storyteller. When she's not acting for grown-ups in theatres or on TV, Hilary works in schools telling stories, running workshops and helping children create amazing things. In 2019 she played the title role in Wonderful Beast's The Last Woodwose.

**ANUSHA SUBRAMANYAM**

A dance maker, performer and teacher. Working with all ages and abilities, her workshops include Bollywood and Bharatanatyam dance. Anusha performs in theatres, museums, hospitals and schools, and has been curating community festivals for several years.

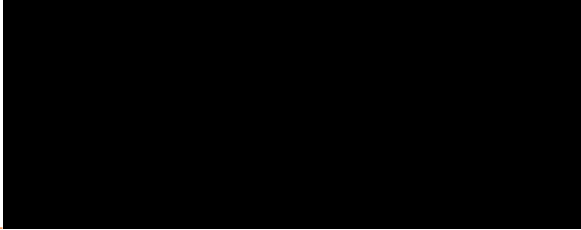
**MARTINA SCHWARZ**

A musician, composer, and choir leader. She plays accordion and ukulele, writes for theatre, film and dance, and performs for communities, schools and residential homes. She creates children's songs and has released several songbooks and CDs.

Wonderful Beast is the Suffolk Theatre Company of myths, legends, folk and fairy tales. We and Wardens Trust regularly run community projects for all ages and we are really looking forward to chatting with you. Give our friendly team a call to find out how you can take part.







## Appendix C

### Deprivation in Suffolk; the Hidden Needs Report 2020<sup>8</sup>

The Hidden Needs Report 2020, commissioned by Suffolk Community Foundation and written by Professor Noel Smith examined deprivation across Suffolk over time.

An important conclusion was that;

**“Indeed, reviewing all waves of the IMD<sup>9</sup> since 2007 shows that, over time, the county has experienced increasing deprivation” (page 17)**

#### “The dynamics of deprivation in Suffolk

*When we move beyond a broad-brush, snapshot of Suffolk - and start developing a detailed, long-term perspective – a more dynamic and complex picture emerges. Levels of relative deprivation in Suffolk are not static and have been changing. **Indeed, reviewing all waves of the IMD since 2007 shows that, over time, the county has experienced increasing deprivation, relative to the rest of England. In 2007, Suffolk was ranked the 115th most deprived upper-tier local authority and by 2019 it was ranked 99th most deprived.***

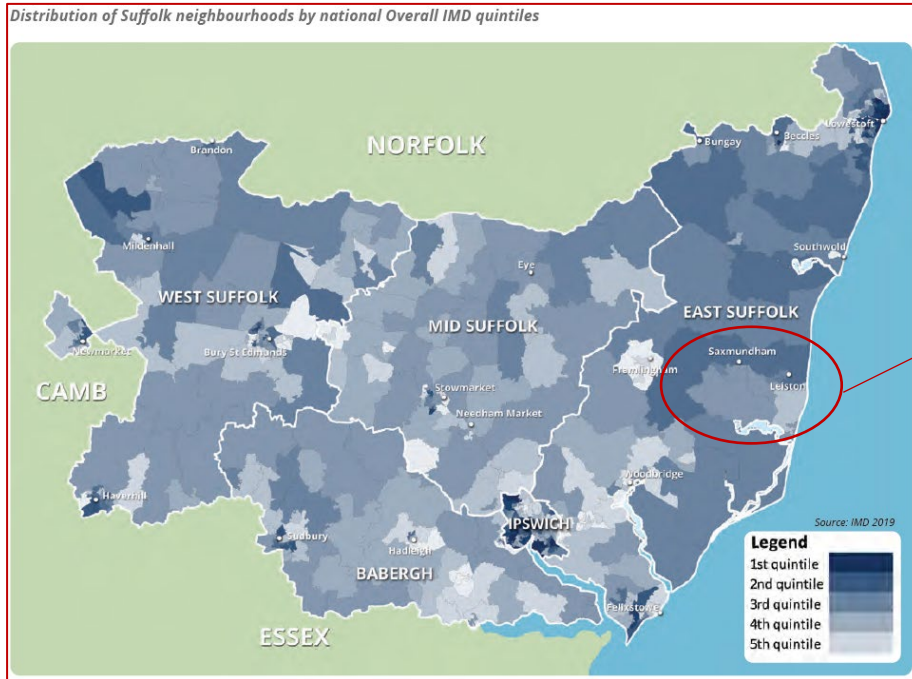
Overall IMD rank: Suffolk changes 2007-2019				
	2007	2010	2015	2019
	Rank	Rank	Rank	Rank
Suffolk	115	114	101	99
	out of	out of	out of	out of
Number of local authorities in England	149	149	152	151

*Note: a lower rank indicates a more relatively deprived local authority*

*In 2007, Suffolk was ranked the 115th most deprived upper-tier local authority, by 2019 it was ranked the 99th most deprived. Note: a lower rank indicates a more relatively deprived local authority”*

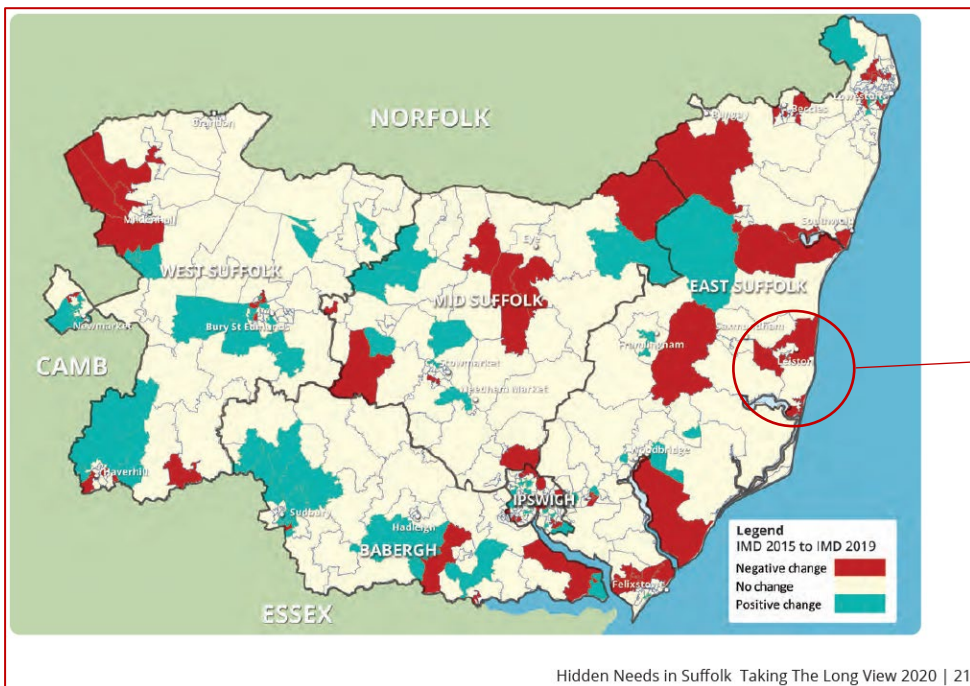
<sup>8</sup> <https://www.suffolkcf.org.uk/suffolks-hidden-needs-report-2020/>

<sup>9</sup> IMD – index of multiple deprivation.



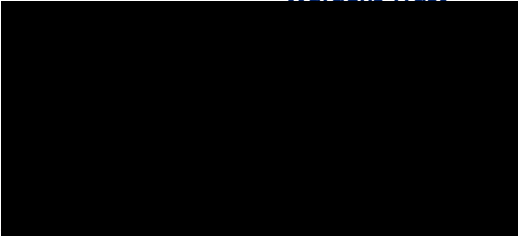
Locality of this development is in the top 20% of IMD in Suffolk

Geographical distribution of neighbourhoods that experienced a change in ranking by at least a decile between IMD waves (Overall IMD). IMD 2015 TO 2020

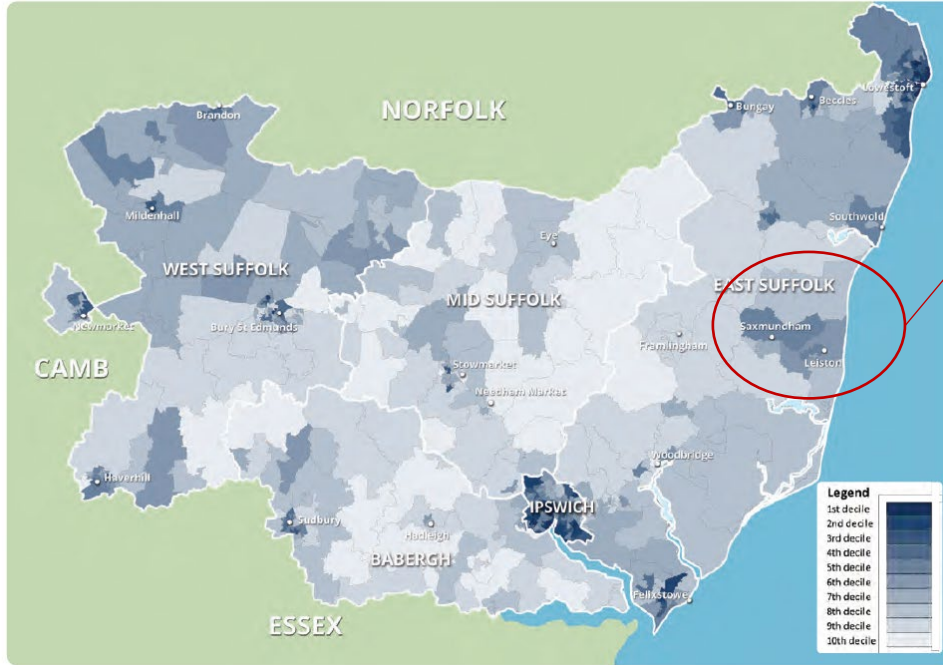


Negative change in IMD means deprivation is increasing in the area of the proposed substation and cable trench





Geographical distribution of Health deprivation deciles, for IMD 2019



Impact of health deprivation on change in IMD

Compared with England generally, Suffolk has low levels of deprivation related to health and disability. Within Suffolk, it is less concentrated than other forms of deprivation. However, this is one aspect of deprivation where Suffolk has fallen sharply in the national ranking. Since 2007, there has been a gradual increase in the proportion of neighbourhoods at the more deprived end of the distribution of health ranking and a decrease in the proportion at the less deprived end. **Over this period, the proportion of Suffolk neighbourhoods among England's most deprived 10% for health and disability has increased from 1.8% to 3.2%.**