

Dear Examining Authority

This will be my last letter on this matter as the final deadline is now reached. Thank you for your time, and I'd like to begin with the following quotation from the Applicant's April 2021 update

[https://www.scottishpowerrenewables.com/pages/offshore\\_ground\\_investigation\\_works\\_april\\_2021.aspx](https://www.scottishpowerrenewables.com/pages/offshore_ground_investigation_works_april_2021.aspx)

*'Scottish Power Renewables recognises the critical importance of the local environment'*

The rest of my letter bears on whether The Applicant has indeed followed that statement.

Here is another quote from the Applicant's website, which now includes quite unequivocally the following reference to EA3 and the 'Hub':

[https://www.scottishpowerrenewables.com/pages/east\\_anglia\\_hub.aspx](https://www.scottishpowerrenewables.com/pages/east_anglia_hub.aspx)

*'ScottishPower Renewables is proposing to construct its future offshore windfarms, East Anglia THREE, East Anglia TWO and East Anglia ONE North, as a new **'East Anglia Hub'**. In the event that full consents are achieved in 2021, for East Anglia TWO and East Anglia ONE North, the East Anglia Hub concept will enable the accelerated development of these projects and increase efficiencies. This could deliver multiple and wide reaching benefits such as reduced construction timescales, sustained contracting opportunities for our supply chain and a reduction in the cost of clean, renewable energy.'*

'Consent' (presumably 'draft consent') was received in 2017 for EA3 (according to the Applicant's website) and so it appears that if the ExA consents EA1N and EA2 then it will also be in effect consenting EA3. If this is true, it does call the scope of the enquiry into serious question and does seem to highlight, yet again, the importance of the **cumulative impact** on the ExA's decision. These intentions towards the 'Hub' by the Applicant and National Grid are confirmed by their recent answers to your questions in ExA.AS-18.D12.V1 in which they speak of connection points for Nautilus and Eurolink also being at Friston, and the necessity for a larger footprint for the extension bays to achieve this. **I would just like to highlight this point, as these proposals would provide far more disruption and permanent damage to this area than was apparent when the plans were first drawn up, and a grouping of several more substations would clearly have an adverse effect on the impact on the countryside, the community, and its buildings.**

Now let's go back to 2017, when the Applicant started its 'Public Information Days' for EA1N and EA2. At that time, seven sites were under consideration for the onshore part of the project.

- The seven sites were all in the Sandlings area, close to each other, and mostly in an AONB: no consideration seems to have been made of brownfield or other sites further afield.
- The selection of Friston from these seven sites was made according to a 'RAG' process; however no details were given in the public information document as to what the red, amber and green elements were, or how they were scored.
- No mention was made of 'East Anglia Three' at these information days, even though it had been 'consented' in 2017 – nor any mention of the 'Hub' proposal.
- At the information days, questions from the public were frequently not answered satisfactorily, and there seemed to be a basic lack of knowledge of the area and its features on the part of those

making the presentation, and little sympathy or understanding shown by them towards those whose lives they were preparing to change for the worse.

So here we are, nearing the end of this long and arduous enquiry, and only at this final point do SPR and NG finally seem to be publicly admitting what had been rumoured for so long, that their intentions were that Friston would be a Hub to serve EA3, Nautilus, and Eurolink, as well as EA1N and EA2. The overall effect on the community, when all these substations are considered, will of course be much greater than that suggested by the original proposal. It is absolutely heart-breaking for residents and for all who love this countryside.

Of course, for several reasons, a Hub could result in cost-savings and efficiency: but Friston is not the place for it, and the possibility of its being a Hub didn't appear to be considered at the site selection stage.

Please may I remind you that, rather than use an existing site such as Bramford which the Applicants used for EA1, or using another brownfield or industrial site, or using an off-shore ring main, the Applicants made the decision to bring the cables ashore at a well-known beauty spot (where the cliffs are quite unstable), route the cable corridor through beautiful heathland, close to habitation and right across the AONB (in a trench that may need to be dug and filled more than once, or new trenches dug), finishing by building large substations on a greenfield site very close to the village of Friston, blocking a traditional pilgrims path and viewpoint of the church (see below) and causing unimaginable worry to the residents and damage to the tourism industry on which the area depends. It is still unclear what logic was used to take this decision.

The problems and damage caused by this decision are many and have been well rehearsed, and I will just mention a few:

**Noise:** I recently walked past another similar substation, and the noise, both low and high pitched, was quite apparent. There is little doubt that the noise produced by these substations will be heard in many parts of the village, seriously compromising the peaceful atmosphere for which this area is noted.

**Flooding:** much has been said about this, but I would just confirm what several IPs mentioned in Deadline 12, that on Friday 18<sup>th</sup> June much of the floodwater that flooded the junction of Grove Road and Aldeburgh Road came down the track past Woodside Farm into the culvert (thus originating in the substation area), and more came from the site proposed for the haul road next to Church Farm. This has happened several times in the past year, yet the Applicant still maintains that these floods are rare events.

**Light:** The night sky in Friston and environs is a beautiful place in which the stars are clearly illuminated. It is evident that the substation lighting will affect this for the worse.

**Landscape:** In their Deadline 11 submission (confirmed in their Deadline 12 submission), Historic England drew attention to the fact, mentioned by many IPs in their submissions, that the proposal would sever the ancient trackway between Little Moor Farm (Grade 2 listed) and the church (Grade 2\* listed). You can see the beautiful views along this trackway at this point, and elsewhere, in the video of my orchestral piece 'Friston Moor'. <https://youtu.be/oNppUzcFcto?t=58> Historic England continued by saying that although a footpath is a 'non-designated asset' it forms a link between two listed buildings and thus by its removal it would produce a 'very high degree of harm' to the setting of the church. They conclude that 'We remain of the view that heritage aspects were not given due weight by the applicant in the site assessment process, and therefore the contribution that this land

*makes to the significance of the designated church was not fully considered'*. I would add that the Applicant's recent attempt, in their Deadline 12 answers, to justify the site selection by saying that some field boundaries have been removed in recent years, and pylons are already in place, does not justify the site proposal in any way.

**Mitigation:** there is little evidence that the mitigation plans will truly hide the substation from the surrounding area, and indeed it would be impossible to mitigate the blocking of the historic trackway and the view between St Mary's Church and Little Moor Farm. Much of the necessary mitigation is of course needed because the site is close to habitation on three sides – other, more remote, brownfield or industrial sites wouldn't necessarily have this problem.

**Employment:** the onshore proposals will create some temporary employment in the construction phase, but once that is over, it will provide no employment at all. The offshore proposals will produce a permanent employment boost for the Lowestoft - Great Yarmouth region, but not for the Suffolk Sandlings area. This employment boost would be the same if the onshore cabling and substation were elsewhere on the East coast. By contrast, the Sandlings district, whose primary industry is tourism, would suffer greatly from the continual disruption this proposal would cause.

It does seem that in the race to provide green renewable energy, the Applicant has gone ahead with promoting a substation site, landfall site, and cabling route which was hastily chosen and just not fit for purpose. This is evidenced by the need for extension of the Examination to allow time for all the material to be prepared, and by the objections to the onshore aspect raised by a vast number of IPs as well as our MP Thérèse Coffey, Suffolk County Council, Historic England, SASES, SEAS, and all the candidates for the East Suffolk District Council by-election (Aldeburgh and Leiston Wards) to be held on 8 July.

I'd also like to draw attention to two quotes: '*Scottish Power Renewables recognises the critical importance of the local environment*' (April 2021 – see above) and from Boris Johnson in Parliament (Hansard, 19 May 2021): '*My hon. Friend is spot on in what he says about the need for an offshore grid. As well as building the fantastic windmills, it is vital that we bring the energy onshore in a way that has minimal disruption for local communities and enables us to maximise efficiency.*'

We should all ask ourselves whether the Applicant's proposals, particularly when we add in EA3, Nautilus and Eurolink, meet these criteria. It seems to me, that the only way to reflect the views expressed in the previous paragraph and by the vast majority of IPs is a 'split decision', and **I would ask that the ExA recommends this: consenting the off-shore aspects, but not the on-shore ones.**

Finally, I would like to thank all involved in the ExA for their attention to detail and desire to consider all points of view during the difficulties caused by the pandemic, and express the hope that now, as things return to relative normality and the Examination nears its end, the Panel will have time to give all matters raised full consideration in a way that might not always have been possible at the height of lockdown, particularly taking into account the cumulative impact of the proposals and the lack of joined-up-thinking in this proposal regarding power delivery. It's been a long journey for us all, and balancing the necessary requirement for renewable energy against damage to the environment and to human health is not an easy task, but I do hope and trust that you will be able to come to the **split decision** recommendation.

Thank you all.

With kind regards,  
Alan Bullard