

5th July 2021



### **Deadline 13 - Closing Statement EA1N & EA2**

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Dear Examiners,

After long and unexpectedly drawn out DCO examinations for Scottish Power's EA1N & EA2 wind farm proposals it remains clear to local people and hopefully to the examining team, that the 'onshore' development proposals for these projects are far from acceptable, numerous concerns have been raised that Scottish Power and National Grid have failed to comply with planning policy. Equally as these examinations draw to a close, essential supporting materials remain outstanding including an adequate Cumulative Impact Assessment. Surely this is a completely unacceptable situation given the sensitive protected coastal AONB landscape involved?

The fact many energy projects in the pipeline are in the public domain, submitted to the Planning Inspectorate (North Falls & Nautilus projects,) or currently undergoing DCO examination (Sizewell C), it is inexplicable that Scottish Power feel they do not need to comply with NSIP planning guidance in making assessment of the impact of their projects in conjunction with other proposed projects.

We continue to lend full support to SASES & SEAS campaigns and the valuable contributions they have made to the examinations. Their contributions have helped represent the concerns of local residents and have sought to address the shortcomings of Scottish Power's DCO proposals and hold the developers & National Grid to account. We support the final submissions of SASES & SEAS and provide our closing comments below:

#### **Onshore Substation Site - Site Selection & Consultation**

Offshore wind power will play a major role in helping the UK to meet its net zero carbon objectives. However energy developers surely shouldn't be given the green light for poorly devised onshore development which is always a major feature of offshore wind farms. The failures in EA1N & EA2 DCOs run from site selection, to consultation and into examination where Scottish Power failed to listen to concerns on many issues and National Grid infrastructure wasn't even adequately consulted on.

The examinations have learned

- There were more suitable locations for onshore substations but the site selection process was engineered to ensure Grove Wood site was pushed to the top with completely unfair scoring.

- No brownfield sites were considered or shortlisted like Bradwell in Essex or Bramford to the north of Ipswich (where EA1N & EA2 should have originally connected).
- A better approach to connections has not been encouraged by National Grid as NG appears to need a connection at Grove Wood for their own future projects. In fact Friston already appears in plans and materials put out by National Grid even though it has not yet received consent or been constructed.
- The site at Grove Wood, Friston has significant flood issues caused by water run-off, issues highlighted at consultation and through the course of these examinations but largely ignored by Scottish power.
- Flood risk associated with the land remains and proposals submitted by SPR as to how they plan to address flood issues and manage surface water have not satisfied experts representing SASE Clive Carpenter (Partner and Head of Water Resources) - GWP Consultants, or Matt Williams - Suffolk County Council Lead Flood Authority.
- Noise emissions from substations if built at Grove Wood could produce a constant background hum that has been described as being audible to nearby residences.
- Noise emissions provided by SPR have been shown to be flawed and have been called into question in the submissions made by ESC & SASES expert Rupert Thornely-Taylor see: SASES (REP8-220) and note Deadline 12 (REP12-122)
- Noise from switch gear has not been addressed due to failure of National Grid to provide details of equipment and associated noise from National Grid infrastructure associated with EA1N & EA2 or other future projects.
- We have learned that a National Grid substation could result in much more than just these projects and a reluctance to accept any limitation on development rights is evidence that more is planned.

## **Mitigation**

Mitigation proposals by Scottish Power completely fail to address the needs of local communities and businesses. Onshore around Friston and the cable route there will be no permanent jobs created, just destruction of a protected landscape and a detrimental permanent blight on the village of Friston and its residents; for residents of Friston, how can some minor improvements to substation design and enhanced screening be considered adequate mitigation. If consented this development will have a negative impact on the lives of residents: physically, mentally and financially.

## **Unacceptable Precedent**

We would hope that the onshore proposals and building a new connection hub at Friston on greenfield land is rejected as it would set a damaging precedent that National Grid will inevitably exploit. Many have said these DCOs are the Trojan horse that could lead to numerous connections and future extensions to infrastructure at Grove Wood. A notable absence of National Grid (NGESO) to participate in these examinations to explain themselves and answer questions has led to a failure in the examination process to provide opportunity to understand the implications of future development or what this means for Friston village and the wider area.

Requests from other commercial parts of National Grid for access to and connections via Grove Wood (if built) surely legitimizes these concerns. The video released by National Grid "[The East Coast Story](#)" includes a map showing a hub at Friston even though a connection has not yet been built or for that matter consented by BEIS.

Does the examination team consider National Grid NGENSO's absence from examinations acceptable when National Grid is happy to put out PR that preempts the recommendations of the examiners?

### **Split Decision**

We strongly urge the examination team to consider a split decision on these DCOs whereby the offshore elements of EA1N & EA2 could be granted to allow offshore work to get underway.

However the onshore proposals are refused to ensure new options are considered for how and where these wind farms will bring energy onshore and connect to the grid.

Ideally CION, grid connections, onshore cable route, substation locations should all be revisited in order to find suitable better alternatives that won't cause repeated damage to an AONB and unnecessary industrial development in the countryside metres from a small Suffolk village.

This could provide a real opportunity to find least damaging solutions that offer better coordination which we have heard so much about from National Grid, energy companies and government but we have yet to see any action on.

Kind Regards,  
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Jonathan Burch