

From:

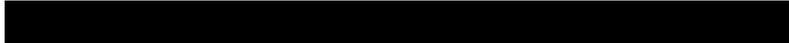


Subject:

DEADLINE 13 Submission as individual EA1N- EN010077 and EA2 - EN010078

Date:

05 July 2021 21:03:11

Peter Chadwick, 

Subject: DEADLINE 13 Submission - as an Individual^[1]_[SEP]

PINS Ref: EA1N- EN010077 and EA2 - EN010078^[1]_[SEP] My Ref ID No. EA1N - 20023841 and EA2 Ref ID No.20024845

Dear Examining Authority,

My final submission. I call upon the Examining Authorities to recommend to the Secretary of State a 'split decision' so that^[1]_[SEP]

1. The offshore turbines are recommended for consent. (We are fully supportive of renewable energy and have no objections to the offshore elements of these DCO applications with the proviso all installations are acceptable to stakeholder concerns over the statutory purposes of the AONB affected by these proposals).^[1]_[SEP]

2. The onshore infrastructure is rejected in favour of full consideration of better locations for this infrastructure where the adverse impacts are minimised at a brownfield site, industrial site, or offshore ring main connection.

As an Interested Party, I have participated throughout the course of the Hearings and I think one thing has become clear, the adverse impacts of this particular onshore site location substantially outweigh the benefits of the application when taken as a whole. The impact on our environment and the local communities and economy would be devastating but importantly needlessly devastating. There are alternative sites available which could avoid this destruction by their virtue of being at a brownfield site.

NB: If consented, this destruction will be replicated and exacerbated for Nautilus, Eurolink, Galloper Extension, Greater Gabbard Extension, SDC1 and SDC2. This could result in eight expansions to the cable trenches. This is at the same time as the proposed massive Sizewell C construction plans with its own great destruction of the this special area and great disruption to local lives and tourism.

Indefensible impact on coastal communities:

^[1]_[SEP]"We recognise the impact this is having on the coastal communities which host this infrastructure and will ACT QUICKLY to take the ^[1]_[SEP]necessary steps to address the situation This will consider the full impacts on affected communities, particularly on the east coast of England ..." - The Energy White Paper.

As we have heard from an overwhelming number of residents, who have courageously and passionately spoken at the Open Floor Hearings, the impact of these Applications upon their community is simply too great. People have chosen to live in the midst of countryside free from the noise, lights and sites of an industrialised landscape.

With the information currently available the huge substation site of Friston and the cable trenches will be in a permanent state of construction for the next 12-15 years, quite possibly longer if we factor in the next round of projects and decommissioning.

There are more suitable locations at semi-industrialised or brownfield sites, where any unmitigable noise pollution, light pollution and air pollution, although present, will not impact on a local community, school children, the elderly and perhaps most importantly the mental health of all who live within metres of this site or who will have their land forcibly acquired. The adverse impacts of the proposed cable route and substations clearly outweigh the benefits, when less damaging alternatives are available.

Indefensible impact on biodiversity

"We will safeguard our cherished landscapes, restore habitats for wildlife in order to combat biodiversity loss and adapt to climate change, all whilst creating green jobs". These words in the Energy White Paper stand in stark contrast to the devastation inflicted if the current onshore plans for EA1N and EA2 are consented.

Any onshore substation and cable corridor will have an adverse impact on biodiversity but the current plans to connect EA1N and EA2 to the Grid are excessively destructive, 70 feet wide cable trenches gouging 9 km inland through the Thorpeness Cliffs, Suffolk Coastal Path, the Suffolk Sandlings and the Area of Outstanding Natural Beauty to arrive at the substation site of Friston in the midst of untouched countryside.

There is a real and tangible risk of further destabilisation at Thorpeness Cliffs as a consequence of drilling. In addition, the fragile Coralline Crag is threatened from subsea cable work.

This degree of damage to an environmentally sensitive, diverse and legally protected landscape brimming with biodiversity, is unmitigable, unacceptable and given the availability of better alternative brownfield sites either on the coast or using existing cable routes, indefensible.

Given that there are less environmentally harmful onshore solutions available, the onshore works, as they stand, should not be consented.

Adverse Impact on Roads Traffic and Emergency Services

The local road system is a mix of narrow country lanes with a few arterial A roads which barely accommodate the peak season traffic, in particular during holidays and festivals.

These roads are bumper to bumper at peak times. They are already dangerous for cyclists and ramblers.

Any additional, heavy construction traffic will be the tipping-point for locals and visitors who have come to enjoy the tranquil haven and easy access of coastal Suffolk.

With gridlocked traffic, emergency services will fail to reach their destinations in time.

Unlike other coastal destinations such as North Norfolk, and thanks to the abundance of river estuaries across the Orford, Aldeburgh, Southwold region, there is no radial coastal road along the Suffolk Heritage Coast. The A1094 to Aldeburgh is therefore a crucial arterial road for the two main commercial sectors in this district, Tourism and Farming.

Friston itself is over four miles from the A12 along narrow, winding, lanes.

There is a real likelihood that the cumulative impact of multiple energy projects will be too great a burden on the road system.

Economic impact

Offshore wind will undoubtedly bring a positive national and regional economic impact and we welcome the regeneration possibilities for Lowestoft as a centre for the renewables industry. However, as SPR's latest Newsletter shows, EA1 has brought NO jobs to the local area.

At a micro level, around Friston and the surrounding villages, research commissioned by the Suffolk Coast Destination Management Organisation (DMO), suggests that new energy projects on the Suffolk coastline could impact the local tourist economy by up to £40 million per annum.

This is a devastating and unacceptable loss of income in an area with limited business opportunity. Unacceptable because it is needless. The destruction of swathes of unspoilt countryside which in turn will destroy a significant proportion of the nature-based tourism sector would not occur if the onshore substation complex was taken to a semi-industrialised or brownfield site using existing cable corridors. The economic adverse impacts on the local communities far outweigh any benefit. The inevitable commoditisation of the region will impoverish the quality of life for all affected communities.

GOVERNMENT POLICY AND THE JUSTIFICATION FOR A 'SPLIT DECISION'

EA1N and EA2 can and should benefit from early integration

It is clear from Issue Specific Hearing (ISH) 4 that there is still a question mark over which and exactly when projects are considered to be at a stage of 'development' and thus might benefit from "early opportunities for coordination" and be considered pathfinder projects.

We agree with the view of Suffolk County Council as expressed at ISH 4: "We are not at the stage that this project is in development in a physical sense, [in] that works are already underway. We are at the pre consent stage. And we are at a stage where the project is still itself being changed by the Applicant, where it sees that there is a justification for change... "

As page 4 of the OCP Phase One Final report says, "Adopting an integrated approach for all offshore projects to be delivered from 2025 has the potential to save consumers approximately £6 billion, or 18% in capital and operating expenditure between now and 2050". Importantly, footnote 5 states, "This means applying an integrated approach to all offshore projects that have not yet received consent". Therefore, EA1N and EA2 have not been excluded from consideration from integration. The onshore aspects of these projects should be rejected to enable full consideration of an integrated approach offshore, in line with current government policy. This will enable the adverse impacts of onshore solutions to be minimised.

The appropriate balance between environmental, social and economic costs.

"To ensure that the transmission connections for offshore wind generation are delivered in the most appropriate way, considering the increased ambition for offshore wind to achieve net zero. This will be done with a view to finding the appropriate balance between environmental, social and economic costs." - BEIS Review Objective

As set out clearly and unequivocally in the OCP Report, the early adoption of the Offshore Transmission Network by commencing integration in 2025 will be universally positive in terms of cost, climate and for consumers. Moreover, it chimes with the government's ambitions with regard to the BEIS Review and Energy White Paper.

These Applications have come at an unprecedented time of consensus around the importance of offshore wind in reducing the UK's carbon emissions and meeting the government's 2030 offshore wind targets. They have also come at an unprecedented time of consensus around the acutely detrimental impacts of radial connections which these Applications propose. There are still 9 years to go until the Government's 2030 offshore wind targets. There is time for ScottishPower Renewables, National Grid and the Department for Business Energy and Industrial Strategy (BEIS) to get this planning Application right without jeopardising these important targets. The National Grid should be as its name suggests - an organisation that works for the British people not for private shareholders who have no interest in our environment.

A 'split decision' would mean that no time is wasted with respect to the construction of the offshore turbines but would give the opportunity to rethink the onshore aspects of this project to fall in line with current government aspirations. "We will safeguard our cherished landscapes, restore habitats for wildlife in order to combat biodiversity loss and adapt to climate change, all whilst creating green jobs." (There are none locally) "To minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid." The Energy White Paper

The onshore part of this application should be rejected as having a needless unacceptable impact on a very special area of East Suffolk. Areas of Outstanding Natural Beauty, Special Protected Areas, the rare and endangered Sandlings and Sites of Scientific Interest should not be treated in this destructive way in the name of short term expediency ruining the basic human rights to have and enjoy and blighting the lives of residents and tourists along with the wildlife of the unique area.

Kind regards
Peter Chadwick
- as an individual