



Gareth Leigh
Head of Energy Infrastructure Planning
Department for Business, Energy and Industrial Strategy

27 January 2022

Applications by East Anglia ONE North and East Anglia TWO ('the Applicants') for an Order granting Development Consent for the proposed East Anglia ONE North and East Anglia TWO Wind Farms and associated offshore and onshore infrastructure. (The East Anglia ONE North and East Anglia TWO projects)

Your Refs: ENO10077 / ENO 10078

**Joint Responses of Simon Ive (Refs: 20023671 / 20023672)
and Mrs. Christine Ive (Refs: 20023417 / 20023433)**

Dear Mr. Leigh

We write as registered Interested Parties in response to your circular letter of 20 December 2021.

We appreciate your concerns to appraise outstanding issues and make no apologies for reverting back to previous and ongoing concerns which remain unresolved and in the face of mounting pressures from additional energy projects being considered for this area.

SUMMARY

We request that consent is given to the offshore proposals to develop the offshore windfarm facilities, but that **consent is refused for the onshore proposals** for the following reasons:

- Lack of national and industry planning, co-ordination and control by government, regulatory bodies and industry participants to issues of energy supply and security and location of facilities;
- Necessitating the Offshore Transmission Network Review (OTNR) and need to consider decisions in relation to its findings.
- In turn, we support the joint response to the OTNR from Suffolk County and East Suffolk Councils for a robust and credible process that commands public confidence.
- The human and cumulative impacts of these projects and the increasing number of related energy projects now being considered within this area known as the Suffolk Heritage Coast.
- Leading to better site selection criteria and appraisal.

THE PLANNING PROCESS

We make no apology for reviving issues and representations previously made. The request for further information and deferment of the decision by the Secretary of State (SoS) provides a welcome opportunity to 'take stock' of the processes to which our community has been subject since 2018 – four years!

Standing back, you cannot help but be appalled by the failure of all participants to address fully key issues of national planning, co-ordination and control.



At the time of writing there are five live projects impacting on the communities of the Suffolk Heritage Coast fast becoming known as the Energy Chaos Coast. This year alone we face the following:

End-March 2022: Deferred Decision by the SoS on the SPR/NG EA1N and EA2 DCO applications when so many unresolved issues remain. (See below).

May 2022: Decision by the SoS on the Sizewell C project and its implications. Even as we write, the funding model has yet to be agreed. The financial stability of EDF is further questioned by the cap being placed by the French Government (and majority shareholder) on its French generating tariffs.

Summer 2022: We are now advised of the commencement of public consultations on the Sea Link (SCD1) Suffolk – Kent Interconnector which aims to investigate also the co-ordination of the infrastructure with that of the Nautilus and in due course Eurolink interconnectors and connection points.

Autumn 2022: further round of public consultations regarding the Nautilus Interconnector and later, Eurolink.

Whilst these might be individual projects, they are inter-related and their developments all have cumulative impacts which have been insufficiently addressed in the EA1N and EA2 Applications.

There has been inadequate consideration of the developments of government policies and public concern for the environment, health and wellbeing.

There is no apparent planning for greater centralisation of the necessary infrastructure which cannot be accommodated except by creating an industrial sprawl of individual structures across the rural countryside.

HUMAN IMPACTS

Does anyone stand back and think what effect all this is having on local communities facing uncertain years of consultations, construction and operation of these projects individually and cumulatively?

Not least are:

- the uncertainties of the future;
- loss of amenity;
- isolation (Friston faces being surrounded/cut-off by the proliferation of cable routes);
- noise, light and air pollution;
- diminution of community life, health and wellbeing;
- neglect.

There is the sheer ‘wear and tear’ of keeping track and analysing the welter of documentation associated with these applications. They are technical in nature and their social and environmental impacts inadequately considered. In the case of these SPR/NG projects we are faced with 3,546 documents and 878 representations. The final report of the Examining Authority will likely extend over 500 pages. Communities and their representatives need to



read these to understand better the issues and implications and how to plan better for their lives. Those individuals face extreme costs in fighting their corner in the face of the unlimited resources of the applicants.

CUMULATIVE IMPACTS

These will upset the socio-economic balance of the local economy.

It has lower than national average unemployment levels and accordingly construction will require a huge influx of labour which will necessitate an expansion of construction and facilities to be accommodated.

That will lead to pressures on existing economic drivers:

- Traffic levels and travel infrastructure.
- Health and social care.
- Emergency services
- Competing demands of the visitor and hospitality sectors which benefit from the unspoilt sea and landscapes and related activities.
- Nature and biodiversity. The area is bookended by the Minsmere and North Warren Reserves.
- The substantial voluntary economy which supports local public and cultural organisations and institutions.
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FLOOD RISK

This issue was specifically raised at a meeting of Friston Parish Council and others with SPR on 11 July 2019.

Yet here we are in January 2022 and there still remain outstanding concerns that the risks have not been fully addressed.

As residents of 33+ years, we can confirm that flooding has been caused by water flowing down from the site which is at a level above the village. It tends to accumulate as a kind of ford at the junction of Church Road where it feeds into pipes into what is termed as the Friston watercourse. As we write this is an overgrown ditch. These pipes cannot always cope with the flow leading to flooding in the immediate vicinity of the village hall. Owing to budgetary cuts and Friston not being of prime concern to the local authority, the watercourse which leads into the centre of the village is inadequately maintained.

SPR's mitigating measures stop at Church Road and they have made little or no attempt to address this flow and the cumulative impact in the centre of the village.

Also lying above the village are fields and Grove Wood alongside which will run the cable route and haul road. In recent years there has been increased flooding from surface water flowing from the fields down into the village along Grove Road causing flooding to residents' properties. This brings accumulated silt which the local authority says is contaminated and therefore lies in the footpath until such time it is removed. Surface water from the same fields has caused flooding to the Rectory along the Aldeburgh Road.

Even as agricultural land, the various changes to growing and usage (crops to livestock and arable) have disturbed the land and caused flooding to happen.



Placing therefore, thousands of tons of concrete etc. on this fragile landscape and the impact of construction works is bound to exacerbate the cumulative flood risk and the need to be assured that the SUDs are appropriately designed and managed and that water is run off into the watercourse which in itself must be subject to proper management.

Contingency should be made for the impacts of the other projects in the pipeline which require cabling routes and access to the Friston site.

Experts have constantly challenged the assumptions made by SPR and Suffolk County Council and the responses are even now evasive. **This issue demands resolution prior to considering consent.**

SITE SELECTION

This and the RAG assessment have always been considered seriously flawed.

Insufficient attention was given to the

- fragile nature of the rural landscape;
- inaccessibility of the site for major construction and vehicle movements;
- proximity to a residential village with heritage assets.

It should be remembered that the original intention was for EA1N and EA2 to be connected to the existing and established sub-station complex at Bramford via the Bawdsey link. It is still not clear why that connection was not made.

Bramford is

- an established sub-station complex
- more easily accessible from a trunk road
- has space to expand without unduly intruding on nearby villages
- is seen as pivotal in the transmission network to extend national grid links:
Bramford to Twinstead; Bramford to Tilbury; Norwich to Bramford.

Why then create a new site at Friston which is limited in its capacity to absorb additional projects? Accordingly, placing the interconnector projects in the surrounding countryside would create an industrial sprawl of infrastructure and multiple cable routes.

Can these infrastructures be incorporated at Sizewell?

Why are not brownfield or more remote locations considered?

CONCLUSION

We reaffirm our request that consent should not be given to the onshore facilities. That wider consideration should be given to the cumulative effects and ongoing OTNR.

We draw your attention to the joint response from Suffolk County Council and East Suffolk Council to the BEIS Offshore Transmission Network Review for an enduring regime and multi-purpose interconnectors (28 September-23 November 2021) dated 22 November 2021. Inter-alia this requests 'a robust and credible process to establish and maintain public confidence'....'The Councils consider that without greater public confidence in delivery of generation and network infrastructure, social permission for the necessary changes to adapt to and mitigate the impacts of climate change may be undermined'. Long overdue!