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Your Ref: EN010077 & EN010078

1 August 2018

Dear Sir/Madam Re: **Scottish Power Renewables EA1N and EA2 Projects**

I am writing on behalf of a Working Party of Friston Parish Council, which has the support of the neighbouring rural Parish Councils of Knodishall, Aldringham-cum-Thorpe, Benhall and Sternfield. The working group has the public name **Substation Action – Save East Suffolk (SASES)** and has the objective of opposing the unnecessary and avoidable industrialisation of rural Suffolk countryside and communities by power companies such as Scottish Power Renewables (SPR), National Grid Ventures (NGV) and National Grid Electricity Transmission (NGET). For the avoidance of doubt SASES fully supports the generation of electricity from renewable sources so long as this is implemented in a way that properly respects the needs of communities and the countryside, as well as the specific needs of natural habitats.

This letter is a Formal Complaint to PINS relating to the so-called Consultation managed by SPR for their East Anglia 1 North and East Anglia 2 wind farms. We assert that this Consultation has failed to meet the requirements of the relevant Planning Acts, Planning Advice Notes, and PINS guidance, and that as a result the conclusions reached by SPR, in particular with regards to Site Selection for its On-Shore substations, are invalid.

We believe that the only acceptable remedy to this failure would be to halt this stage of the project and for the Consultation process for the On-Shore works to be rerun from an early stage with the existing process failures rectified. Failure to address this complaint will give rise to lengthy and time consuming objections at the Hearing stages of the DCO application which is not in anyone's interest.

Background

1. The EA1N and EA2 projects are for the creation of electric power for the UK grid using massive off-shore wind farms. EA1N has a target capacity of 800MW whilst EA2 has a target output of 900MW. Taken together with the SPR EA1 and EA3 wind farms (already

consented) the total power output will be 3.6GW, which is the total that NGET approved SPR to deliver to the grid a number of years ago.

2. It should be noted that it was originally planned that all this power would be delivered to NGET from three 1.2GW wind farms via an underground cable route from landfall at Bawdsey to the existing major substation site at Bramford, and this cable route is currently under construction. However, due to a series of SPR project decisions, which we continue to assert were unacceptably flawed, little more than half of this power can now be delivered to Bramford, and SPR has therefore been directed by NGET to search for a new substation site near to a fresh landfall at Sizewell/Leiston, together with a new cable route.

3. The EA1N and EA2 projects therefore comprise three main elements:

- Off-shore wind farm structures and buried cables. These will be sufficiently far out to sea to be barely visible from the coast and will have impact only on specialist communities such as fishermen.
- Two On-shore SPR substations required to convert the wind farm electricity to a voltage and quality suitable for connection to the National Grid, together with an NGET substation providing connectivity to the grid itself and also overload protection. These substations are preferably, but not necessarily, located at the same site. The proposed substations are extremely large (total circa 30 acres footprint) and comprise ugly electrical equipment and metal structures only partially housed in buildings up to 18m high, which cannot reasonably be made unobtrusive in any rural setting. They are also known to produce high levels of audible noise which is very hard to mitigate and likely to affect nearby communities. 'About as loud as the dawn chorus' was how the noise level was described recently at a PID. In the countryside, with little or no background noise that's very loud and wakes many people up!
- A cable route 50m wide from landfall to the SPR substation location to be excavated and then backfilled together with (potentially) a further cable route from the SPR substation location to the NGET substation location. This cable route will be extremely disruptive during construction but should be capable of being restored to a good standard, except that tree planting cannot be allowed and permanent cable access chambers will be required every 1km.

It will be readily apparent from the above that the key project decision to be made is that of On-shore Site Selection for the SPR and NGET substations. SASSES asserts that consultation on this topic has been totally disorganised and non-compliant with any reasonable consultation process.

Consultation Process

4. Prior to October 2017 SPR published a Flow Chart of their Public and Technical Consultations for the EA1N and EA2 projects. This is appended below as Figure 1. A plan was also made available on the Public Information Boards at the PIDs in **October 2017** showing the Onshore Study Area for the required on-shore substations and the cable route. This is appended below as Figure 2.

Examination of the flow chart shows that consultation for the On-shore constraints (including the critical issue of substation location and cable route) was scheduled for **October, November and December 2017**, with an update on progress to be provided in March 2018 following landowner engagement during January and February 2018.

Clearly the consultations in late 2017 were the appropriate and correct time for all affected communities to be allowed to understand the project implications and express their views on the most suitable sites for the substation.

It is appropriate to note that at this point that an SPR Director and accompanying Stakeholder Manager told SASES (meeting of 18 July 2018) that their approach to public consultation for EA1N and EA2 was based on the process they applied to their earlier EA1 project. But in the EA1 case **no site selection was required** as NGET had directed SPR to deliver power to the existing Bramford substation site at which more than adequate additional land was available for SPR's equipment. SPR's failure to appreciate that EA1N and EA2 had serious site selection challenges may be at the root of the failure of the current consultation.

5. Despite SPR claiming to start consultation on substation site selection in October 2017 it is a matter of record that Friston Parish Council, despite having land within the Onshore Study Area and being a significant rural community adjacent to the area, was not informed of the SPR projects until **5 February 2018**, and then only by a single email with no follow up by surface mail or other means to ensure receipt. In addition it is a matter of personal experience by local BT Internet users with BT internet email accounts that even now a proportion of important official emails from SPR are treated as 'Spam' and not notified to recipients and can thus be effectively lost, or at best only received late. The act of sending an email cannot be treated as proof of receipt. In the case of a Nationally Significant Project on which so much future expenditure is planned this is simply unacceptable.

6. In February 2018 SPR offered to brief Friston Parish Council and a time slot was provided for this as part of at the next Parish Council meeting on **5 March 2018** (the Parish Council meets on a six-week schedule and public notice is required of any extraordinary meetings), which was one day before the SoCC public consultation started on 6 March 2018. The Parish Clerk has advised that 'At the presentation it was repeatedly stated that the preferred area was by the coast and that absolutely no decision had been made' and further that no copy of the SoCC for consultation was mentioned or provided at that meeting and in any case there is no facility in Friston for the public to have access to such a document, despite the claims made in SPR's public SoCC advert (appended as Figure 3), which in any case failed to bring residents attention to the potentially very serious on-shore implications of SPR's projects as distinct from the off-shore aspects which are referred to.

It was only later in March, when a single Friston Parish Councillor attended a PID meeting at Thorpeness and was briefed on the progress made with site location, including viewing the new Potential Substation Zones Map (appended as Figure 4) that Friston residents were given any awareness of the projects, by which time we believe that site selection had been effectively been finalised and was no longer subject to meaningful consultation.

7. In consequence of the **gross failures by SPR** inherent in paragraphs 5 and 6 above the residents of Friston, (and other nearby Parishes) were completely unaware of the Consultation undertaken in late 2017 which was, of course, precisely the consultation they needed to be involved with for site selection. By the time that they were made aware it

appears to have been too late to have any meaningful impact, as confirmed by SPR consultants at recent Parish Meetings. **How can this be regarded as a compliant Consultation Process? We believe it cannot.**

Site Selection Process

8. Further process failures have been found with the Site Selection Process and associated consultations. As examples:

- Meaningful consultation has to be based on the provision of clear information offering choices upon which feedback can be provided. At no time has SPR provided such choices or asked for site selection feedback on the seven zones in other than in the broadest terms and using such leading phrases as to be render any responses totally unreliable. Such feedback has only now been sought and too late in the process for it to have any meaningful impact.
- As an example of a Feedback Question using leading wording consider Question 6 from the March 2018 PID Feedback Form:
“We are currently searching within our agreed study area to find a suitable location for our projects’ substations (see Board 5 and our interactive map). An assessment of the landscape impacts specifically in relation to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) was undertaken. All sites to the West of Aldeburgh Road (B1122) would avoid significant effects on the special qualities of the AONB. In your view, should potentially adverse visual impacts on the AONB be avoided by placing our substations west of the Aldeburgh Road (B1122)? (Answer) Yes or No (plus free text if required).
A totally unbalanced question with blatantly obvious overemphasis on the visual impact on the AONB. And Question 6 was the only Feedback Form question referring to preferred choice of substation location!
- Informal enquiry suggests that the level of understanding of electrical power generation and transmission equipment amongst the general public is insufficient for most residents to properly understand what the project entailed and even now those with some expert knowledge are having to dig hard into dense documentation to expose the realities of what is proposed. SPR should have undertaken far more extensive resident introduction and education before expecting serious consultation feedback. Failure to do this fatally flaws such responses as have been received and which SPR are trying to rely on.
- No photo montages of other landscape visualisations of each of the seven sites were provided during the site selection process to allow a realistic evaluation of the substation impact on each of the seven zones. Were residents expected to use their imagination in assessing impact? This is totally unprofessional on such a large project, and even on a small one, by modern standards.
- The Red Amber Green (RAG) Assessment methodology as presented to the communities is itself a flawed method for decision making. For each of the seven potential Substation sites one of those colours was assigned to each of 23 totally unrelated characteristics (such as Proximity to AONB, Highway Access, Proximity to overhead transmission lines, Visual Sensitivity) and finally a total score of Reds,

Ambers and Greens taken as an objective assessment of that site's relative merit, but without first assigning an objective relative weighting to each characteristic.

- The RAG assessment upon which SPR places so much reliance was shown to Parish Meetings for Aldringham-cum-Thorpe, Knodishall and Friston in such poor resolution as to be incapable of interpretation and no background or explanation was given of the criteria applied and why the Friston site has been selected, other than the totals of Red, Amber and Green measures. No meaningful debate was allowed.
- SPR have refused on more than one occasion to provide critical background information to their RAG assessment of the seven sites, which they had stated to be fundamental to their site selection process. Even such information as has reluctantly been revealed after intense pressure is ambiguous and unclear with questions unanswered. E.g. is the RAG rating for landscape visual impact for the Friston site before or after mitigation, and if after, with what level of mitigation? This question couldn't be answered at a recent meeting with an SPR Director accompanied by the project Stakeholder Manager.
- It is clear from desk-based examination of the RAG chart (itself obtained only after pressure) that a site selection outcome is extremely sensitive to even minor changes in the evaluation of elements and to suggest that the RAG chart can be relied on as the key selector is not justified, but no additional information on site suitability criteria has ever been provided.
- Residents throughout the Indicative Search Area believe that there are much more suitable sites available than that at Friston, and in particular those at or near to the Sizewell power station site and in any case near the coast. This position is supported by the leaders of both Suffolk County Council, Suffolk Coastal District Council, as well as our local MP, Dr Therese Coffey.

It is appreciated that some of these sites are close to, or in, the AONB, but these sites cannot be judged as beautiful, and certainly not Outstandingly Beautiful, and the view of the Suffolk Preservation Society is that the damage to the landscape quality of the Friston site would greatly outweigh that to a site close to Sizewell, albeit in the AONB.

Residents are therefore highly critical of SPR's refusal to even consider selection of a site within the AONB. SPR claim that there are not the requisite 'exceptional circumstances' in place but the willingness of the planning authorities to allow the construction of other substations, and potentially a huge new power station at Sizewell, makes a mockery of such an assertion.

Conclusions

There are numerous other issues that can be raised regarding the so-called Consultation, including Cumulative Impact of the proposed NGV substations that SPR claim to be undertaking and further details can be provided on request, but we believe that the above provides more than sufficient justification for the current Consultation process to be halted.

Consultation should only be restarted after agreement with residents to open sharing of information and meaningful consideration of their concerns, including the preference to site the necessary substations nearer to the coast.

We have previously been advised that PINS may be able to offer 'Outreach' services to provide local professional assistance to projects which are in serious difficulty, such as this one, and we would be open to consideration of proposals from you for this.

Please note that this letter has been written without the benefit of professional advice and we reserve the right to make further challenges to the consultation process.

We look forward to your early response.

Yours faithfully

Chris Wheeler

On behalf of Substation Action/Save East Suffolk

Distribution:

Iberdrola – Samantha Barber (non-executive director responsible for Corporate Responsibility)

Scottish Power/Iberdrola Renewables – Jonathan Cole, Managing Director

Scottish Power Renewables- David Walker, On-Shore Development Director

Dr Therese Coffey MP

The Rt. Hon. John Gummer PC, the Lord Deben

Suffolk County Council – Cllr. Andrew Reid

Suffolk County Council – Cllr. Russ Rainger

Suffolk County Council – John Pitchford (Principal Planning Officer)

Suffolk Coastal District Council – Cllr. Maureen Jones

Suffolk Coastal District Council – Lisa Chandler (Senior Planning Officer)

Parish Clerks of: Friston, Knodishall, Benhall, Sternfield and Aldringham-cum-Thorpe

Town Clerks of: Leiston and Aldeburgh

FIGURE 1

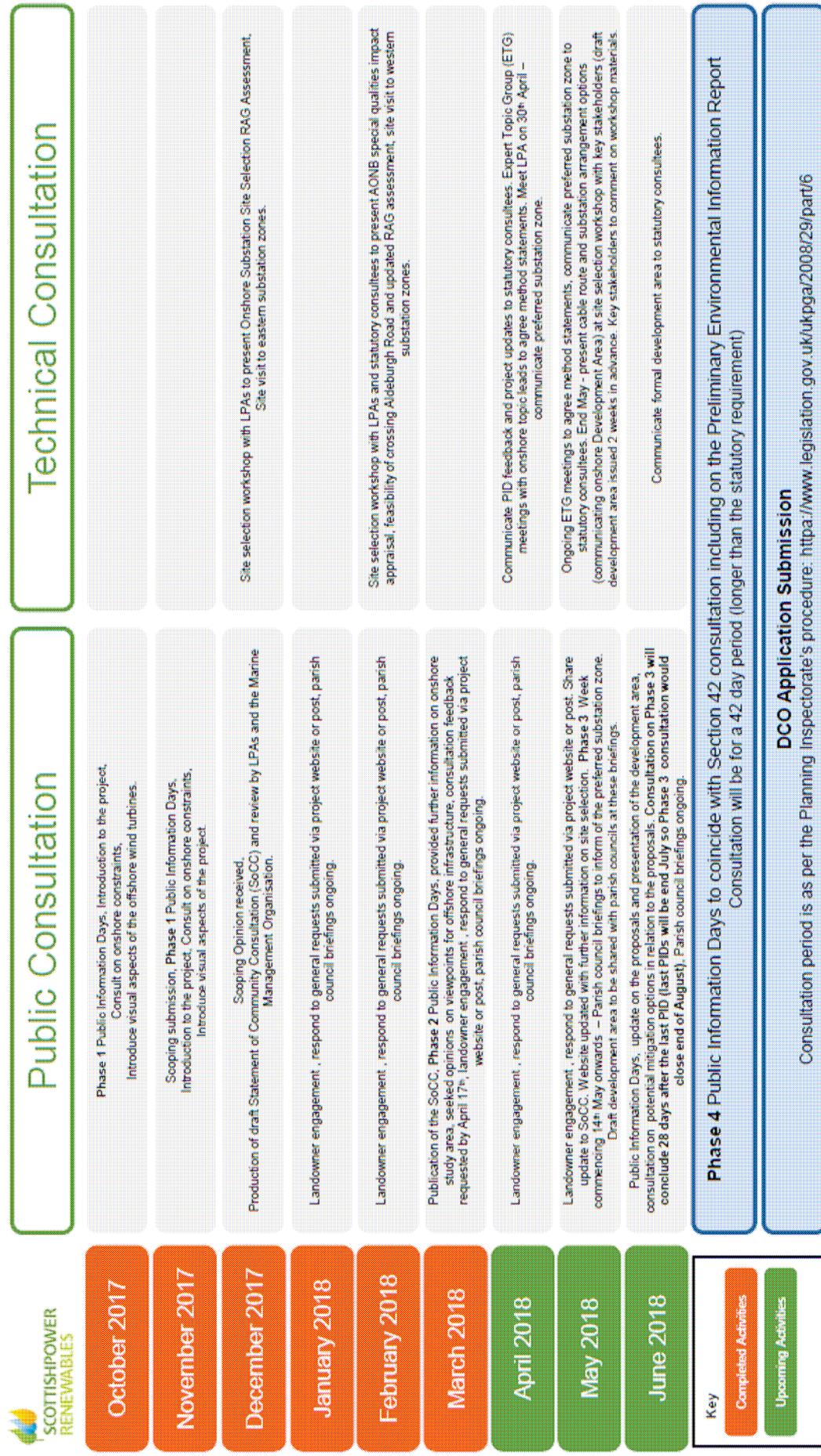


FIGURE 3

East Anglia TWO and East Anglia ONE North Offshore Windfarms

Notification of Statement of Community Consultation

ScottishPower Renewables (SPR) is developing two offshore windfarm projects known as East Anglia TWO and East Anglia ONE North.

East Anglia TWO covers approximately 255km² and will be around 30km from the East Anglia coast at its closest point.

East Anglia ONE North covers approximately 208km² and sits 36km from the East Anglia coast at its closest point.

SPR has published two Statements of Community Consultation (SoCC) in accordance with Section 47 of the Planning Act 2008, one for each offshore windfarm project.

It is intended to submit an application for consent to the Planning Inspectorate for East Anglia TWO in 2019. The application for East Anglia ONE North is then intended to follow in 2020.

Each SoCC sets out how SPR intends to consult with local communities within the vicinity of the projects.

The company welcomes your views on the projects, and invites you to review these documents, and respond by midnight on 3rd April 2018.

SPR has dedicated email addresses: eastangliaonenorth@scottishpower.com eastangliatwo@scottishpower.com

You can reach SPR at: ScottishPower Renewables East Anglia TWO RTLY-RLGH-GKSE FREEPOST 25 Priestgate Peterborough PE1 1JL

All consultation responses received by the projects will be recorded and details may be included within the consultation report, to be submitted alongside the application for consent. SPR will not share individuals' data, only the area they are from.

To launch the consultation, SPR is holding six drop-in information events, where members of the project team, together with specialist consultants, will be available to answer questions on East Anglia Two and East Anglia ONE North. These are taking place as shown below. No appointment is necessary.

Venue	Date	Time
Lowestoft - Victoria Hotel, Kirkley Cliff Rd, Lowestoft NR33 0BZ	17 March 2018	10am – 1pm
Southwold - Stella Peskett Hall, Might's Rd, Southwold, IP18 6BE	17 March 2018	3pm – 6pm
Leiston - Leiston United Church, 45a High Street, Leiston, IP16 4EL	18 March 2018	10am – 1pm
Thorpeness - Thorpeness Country Club, The Benhills, IP16 4NU	24 March 2018	10am – 1pm
Aldeburgh - The Jubilee Hall, Crabbe Street, Aldeburgh, IP15 5BN	24 March 2018	3pm – 6pm
Orford - Town Hall, Market Hill, Orford, Woodbridge IP12 2NZ	25 March 2018	10am – 1pm

Each SoCC is available on the project websites, as follows:

East Anglia TWO Offshore Windfarm
https://www.scottishpowerrenewables.com/pages/east-anglia_two.aspx

East Anglia ONE North Offshore Windfarm
https://www.scottishpowerrenewables.com/pages/east-anglia_one_north.aspx

The documents will also be available to view at the following locations from 6th March 2018 - 3rd April 2018

- Aldeburgh Library
- Aldringham-cum-Thorpe Parish Council
- Aldeburgh Town Council
- Felixstowe Library
- Felixstowe Town Council
- Friston Parish Council
- Great Yarmouth Borough Council
- Great Yarmouth Central Library
- Kessingland Library
- Leiston-cum-Sizewell Town Council
- Lowestoft Library
- Martins Saxmundham Orford Town Council
- Saxmundham Library
- Southwold Library
- Southwold Post Office
- Southwold Town Council
- Suffolk Coastal District Council Services at Woodbridge Library
- The Village Store Kessingland



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