

25 March 2019

TO:

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&

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Dear Sir/Madam,

**Phase 4.0 Consultation
ScottishPower Renewable Ltd proposals for
EA2 & EA1N**

We have reached the end of the Phase 4 consultation process for the above-mentioned schemes. I am a resident in the village of Friston, Suffolk where ScottishPower Renewables, Ltd (SPR) are proposing to build the sub-stations for their proposed off shore wind farms of East Anglia Two (EA2) and East Anglia One North (EA1N). I have been following the process and information carefully and to date the most definite thing I can say is that this is not a consultation process but a way of drip-feeding information to the communities involved for what is a foregone conclusion. From the outset of this process we have pointed out the fundamental unsuitability of the proposed sub-station site and the information released for Phase 4 only reinforces that this is a most ridiculous and destructive proposal.

We are at a point of change, of conscious and determined change. We are moving away from fossils fuel consumption towards renewable, sustainable and green sources of fuel to meet and enhance our need for energy whilst reducing our carbon footprint. The desire for this change is not only due to economic factors but a desire to be wiser and more thoughtful as to the way we want to live.

To date the UK's approach of achieving this change is via energy produced by off shore wind power. Private developers bid and make proposals that go through a consultation process leading to an application for a Development Consent Order (DCO) allowing them to construct the required infrastructure for the benefit of the nation.

This process is new and the implications of this liaises-fair approach to our energy needs are only now being understood. The current process does not take into consideration other adjoining proposals and their cumulative effect; the consultation procedure is structured as a box ticking exercise that merely pays lip service to the local community; and the process allows for changes after consent has been granted that can be detrimental to the local community. In our area respective examples of this include: no overall view of 3 major proposals- EDF's proposal for Sizewell C, National Grid's proposals for interconnectors and battery storage units and SPR's proposals for EA1N & EA2; no acknowledgement from SPR that their 'Groove Wood' sub station site is not suitable for industrial development; and the non-material change granted to SPR for their EA1 project that resulted in additional a need for an additional land fall and sub station location.

There is a time constraint to SPR's bid/offer for EA1N and EA2 putting the projects under pressure to find viable locations for both landfall and sub-station sites, especially after the

changes to EA1. There are only 2 discernible reasons why the site adjacent to the village of Friston was chosen. 1st is that the village is tangent to the existing pylon route from Sizewell nuclear power station and 2nd, SPR very quickly found that this particular parcel of land could be purchased. It should be noted that there are landowners in common at Friston and Bawdsey where SPR are currently working on EA1. In the initial consultation phases, 7 potential sub station sites from the coast inland to Friston were highlighted but not one of these other sites was tested to see how the sub station structures maybe accommodated or accessed. No site beyond Friston was ever considered even if this could mean a more remote location and closer to better road access.

National Grids involvement in dictating both land fall and sub station locations remains unclear. SPR claim that National Grid told them to make landfall at Sizewell. One could have naively thought that by making land fall in Sizewell it would have been the obvious choice for the sub-station development as this is an area of similar industrial use and would limit the amount of cable trenching required. Through local pressure SPR did, for a very limited time consider the Broome Covert site behind the Sizewell nuclear power stations. In essence the reason given to the Planning Inspectorate for discarding this site was that it would be laborious, time consuming and commercially unacceptable. The public excuse at the end of the 3.5 consultation period was that the Broome Covert site was with-in an AONB. In other words though the Broome Covert site is adjacent to similar industrial developments, has better road access, is close to the land fall site and that development with-in an AONB is permit for projects of national importance, SPR choose, for the sake of expediency and commercial reasons to reject it and stick with a proposal for a 30 acre industrial development to be located inappropriately next to a rural village involving 8 kilometers cable trenching with very difficult road access. At the 3.5 consultation stage the Friston site was re-branded Grove Wood.

The consultation process has not given consideration to the type of place Friston is and what the implications are of locating an industrial complex here would be. The local economy in this part of Suffolk is defined by agricultural, the nuclear power plant and tourism. Friston is located between Aldeburgh, Snape and Thorpness. These three areas are the primary draw for tourism in the area. Friston residents consist of retirees, 2nd homeowners, holiday lets and full-time local residents. Most people have chosen to be in Friston because of the local amenities and environment. There are no major roads into Friston. Friston is a peaceful yet active community ideally located with-in Suffolk's beautiful coastal heritage.

SPR's proposal will destroy the character and environment of Friston forever. Phase 4 does address this. The proposed sub-station site is right next to the village and will tower over it. The scale and function of the development is completely incongruous for this location. The sub station buildings will be visible from the village green, the Grade II* listed church, not to mention numerous homes including the 5 listed properties that surround the site. The sub-station development will get rid of the most favorite and best-used footpath around the village. No consideration has been given to the effect that the years of construction traffic and disruption will have on the older members of the community, many who purposefully moved here for the quality of life that the village had to offer.

The proposed site for the SPR development is currently farmland sandwiched between the village to the south, pylons to the north, Friston House wood to the west and Laurel Covert/Groove Wood to the east. The proposed infrastructure would occupy almost all of the site area leaving very limited space for any meaningful future landscaped screening. As the site is prone to flooding parts of the site need to be used as SUDs ponds further limiting mitigation possibilities between the village and the sub station structures. SPR has not been able to demonstrate how any meaningful mitigation could be implemented to the benefit of the village. The proposed 18-meter tall structures are adjacent to and biting into Laurel Covert ancient woodland. The Royal Town Planning Institute Magazine, January 2019, states that ancient woodland and trees are threatened by the cumulative effects of inappropriate developments on their fingers and sited inappropriately would have adverse edge effects on

ancient woodlands and wildlife. It is unclear how the ancient woodland of Grove Wood will be affected by the cable trenching.

This proposed relationship between the village and the sub stations is a very uncomfortable one. We are not talking about a little green box at the end of the road. Below is a photo from Merrie Albion's book, *Landscape Studies of a Small Island*, a photographic survey of Britain. This juxtaposition of industry and the domestic habitation should be discouraged, avoided and certainly not considered acceptable with-in a DCO. The Planning Inspectorate should not be forced to even consider an application that willfully advocates such a relationship between a rural village and an industrial development.



Landscape Studies of a Small Island, Merrie Albion

There are no roads large enough to accommodate the kind of construction traffic required to build this facility. Phase 4 has indicated how SPR proposes to handle the construction traffic required to implement their proposal. To reach Friston traffic will turn off the A12 onto the A1094 Road that leads to Snape and Aldeburgh. This road is already very busy with traffic backing up at the turning off the A12 and snarling at the junction with the Snape. The construction traffic aiming for Friston will turn onto the B1069, the turning for Knodishall (a notorious black spot) after which a new road will need to be constructed in order to be able to reach Friston. Construction traffic for the landfall site will carry on into Aldeburgh turning onto the B1122 towards Aldringham. As the road into Thorpness is so narrow, the Construction traffic will need to be escorted from Aldringham into Thorpness until it reaches the landfall site. All of the proposed routes will require some alterations to make them viable.

SPR claim, "No significant negative tourism and recreation impacts are predicted." Really? We are not talking about a project that might last a season. Depending on whether these projects are implemented concurrently or sequentially we could be talking about 3 or 6 years build time just for the SPR projects. Will making it difficult to get into Snape, Aldeburgh and Thorpness for years have no impact? Will not being able to sit in the beer garden of the most popular pub in Thorpness, let alone not being able to get Thorpness because of the construction traffic have no negative impact on tourism and recreation? Is it viable for SPR to disrupt the local tourist economy in such a grave manor? How long might it take to recover? What does the local chamber of commerce have to say on the matter? Are we saying that the only site plausible for the sub station development needs to be at the expense of not only Friston but Snape, Aldeburgh and Thorpness as well? What will 3 or 6 years of construction traffic do to such an area?

In addition to the SPR sub-station projects are National Grid Venture's Interconnector and battery storage projects. Again, in principle these projects are a good idea as they take surplus energy from the SPR sub-stations and either store that power for latter use or sell it off to Europe. Infrastructure wise it is a similar undertaking to the substation project entailing a landfall site, cable trucking and additional sub station/electrical buildings. This additional infrastructure will need to have a direct relationship to the SPR projects. Will the National Grid Venture's projects begin once the SPR projects are completed? Would this mean an additional 3 years of construction, another 32-meter wide cable corridor and continued work on the landfall site? Will any landscaping proposal be delayed until all projects are completed? What would this mean to the homes and towns along the cable route (Aldrighinham and Knodishall)? Where will the additional sub-stations and battery units be located in relation to Friston? In their documents SPR state that it would take 15 years for any landscaping to become effective so could that mean in 24 years after construction starts? Should any village be asked to make such an unnecessary sacrifice? What about the existing local economy? Phase 4 has not addressed these issues.

The sub-station development is not designed. The Rochdale envelope approach is being used. The result of this is that even at Phase 4 there is very little factual information about the project: noise, sound attenuation methods, radiation and electrical charges, illumination & security requirements and of course the size and aesthetic of the development. All we really know is that the development occupies an area larger than Wembley Stadium and is at least 18 meters in height and higher depending on the type of sound attenuation utilized. Further to this is the fact that should approval for this project be granted we don't know what kind of changes SPR may make and how these may further adversely affect Friston and the wider community. We don't know much about the National Grid projects. Throughout this consultation process there has been no input from National Grid and yet they play a major role in this development. To be able to consider SPR's proposal not only must the cumulative effect of both EA2 & EA1N be understood but that of the National Grid projects as well, not to mention Sizewell C.

Announced on the 23rd of July 2018, the government and industry set itself the ambition to provide by 2030, 30GW of energy produced by off shore wind power. A coordinated well-planned policy and strategy needs to be developed that locates energy hubs in appropriate locations, accessed by appropriate means. There is no rational reason for these projects to cause great and everlasting harm to coastal communities and the countryside.



SPR'S proposed relationship between the sub stations and Friston Green

SPR can only justify this site selection because of its proximity to the overhead pylons and the willingness of a landowner to sell them a parcel of land. The proposal to locate the largest sub-station of its kind anywhere in the U.K. and Europe adjacent to a rural village, in the mists of a tourist and recreational environment is absolutely ridiculous.

Mya Manakides

My friends and family have spent the last year pouring over SPR's reports, analyzing them line by line. Most of what we know about this proposal and its history comes from the work they have undertaken. Some of my friends are having health problems due to the stress caused by this proposal. Others are unable to sell their homes though they may need to for reasons other than wanting to move away from this potential horror. Property values have fallen throughout the village. Unforgettable was the 2nd meeting held by SPR in our village hall, when addressing us in a patronizing manor, SPR told us it will all be okay because we would be able to choose the colour of the sub station cladding! SPR's attitude to Friston and its residents are insulting and derisive. The consultation process is a box ticking exercise that merely pays lip service to the local community.



SPR's proposal for Friston, Suffolk, as viewed from the Grade II* listed Church of St. Mary.
Note the well-trodden foot path.

In its current guise the proposal to site the sub stations for EA1N & EA2 at Friston do not have the support of the local authority or communities. Government officials are now becoming aware of the situation as exemplified by the House of Commons debate on the 11th of March, instigated by George Freeman MP, as his Norfolk constituency is being affected in a similar way. An intervention on government level is required to gain control over this situation as it has national implications for our energy requirements, climate change and environment. Required is joined up thinking from the Department of Business, Energy Industry & Strategy as well as The Department for Environment, Food and Rural Affairs. The nation's energy needs cannot be approached in a piece meal fashion. We need government to propose energy hubs and energy links in a manor that will not mean the wanton destruction of coastal communities and the areas adjacent to them. Private developers should be given a proper framework in which to implement their projects otherwise we end up with spurious proposals like the one for Friston.

Yours faithfully,

Mya Manakides

cc.

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