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The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
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Dear Rynd Smith,

Re: EA1 & EA2 Offshore Windfarms

I write following my verbal submission to open floor hearing two on East Anglia One & Two Offshore windfarm. Firstly, to include a written copy of my verbal submission. Secondly, to respond to the point you raised with me during the open floor hearing to link what I was saying about the application in relation to the NPPF to the NPS for Energy.

NPS EN1 para 4.5.1 states:

"Applying "good design" to energy projects should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible."

The substations proposed at Friston are not sensitive to place. The size and scale of the substations will have a devastating impact on the local environment including on local listed buildings which surround the substation site.

The application doesn't include any proposals to dig the substations into the site to promote good aesthetics and their proposed planting to screen the development is woefully inadequate, especially when you take into consideration the growth rates of their landscaping mitigation.

NPS EN1 para 4.5.3 states:

"Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area."

As above, the design will not contribute to the quality of the area. The huge substations will look completely out place within the sensitive landscape and will dominant the area.

NPS EN3 para 2.5.33 states:

"in sites with nationally recognised designations (Sites of Special Scientific Interest, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty and Registered Parks and Gardens), consent for renewable energy projects should only be granted where it can be demonstrated that the objectives of designation of the area will not be compromised by the development."

SPR haven't done this. Instead of facilitating a connection to the grid as close to shore as possible they are proposing a 32-metre wide cabling corridor across 9km of sensitive landscape, including elements of the Suffolk Coast and Heaths AONB. This would have a significant impact on the landscape, including the removal of a number of hedgerows which are interspersed by mature trees.

NPS EN3 2.6.34 states:

"Applicants for consent for offshore wind farms will have to work within the regulatory regime for offshore transmission networks established by Ofgem."

The Ofgem Offshore Transmission Network Review into how offshore energy firms bring their electricity back onshore to the national grid suggests that integrated connections should now be established rather looking at onshore infrastructure in isolation. SPR haven't considered the cumulative impact, including future applications (several of which have already been granted a connection point in this geographic area). There are more appropriate sites, which I've suggested throughout this process that could better integrate onshore connections.

My Verbal Submission:

"I speak in relation to the two Development Consent Order applications as the onshore infrastructure required to facilitate them is for both windfarms, not just one - notably the cabling running westward from Thorpeness to connect to the new substations proposed at Friston.

At the outset, I wish to reinforce my support for the principle of zero-carbon and renewable electricity generation. I was Environment Minister when the Government first made the commitment to have net zero carbon emissions by 2050, some of which will be by reduced reliance on fossil fuel-generated electricity and the enhancement of nature-based measures. The UK already has much offshore wind capacity and as was announced by the Prime Minister this week, more is planned right around the country by the end of this decade.

Particularly in light of this, I strongly suggest that the Planning Inspectorate and the Secretary of State should be considering these two applications in light of the cumulative impact of future applications (several of which have already been granted a

connection point in this geographic area). Not only is this justified by the recent announcement but also that this is exactly what the government said they would do in their document, "Industrial Strategy: Offshore Sector Wind Deal" published in March 2019, when they said in their plans to work with developers, they would address strategic deployment issues including onshore and offshore transmission, cumulative environmental impacts (both in the marine and onshore areas). The government reinforced this in the same strategy plan, stating in reference to the programme for deployment of offshore wind for up to 2030 which it expects to be done in a sustainable and timely way, "In partnership with the government and in collaboration with the devolved administrations, regulators, developers, operators, Statutory Nature Conservation Bodies (SNCBs), and non-governmental organisations, the programme's aim will be to increase the evidence base and understanding of offshore wind deployment, both in the marine area and where there are associated onshore impacts, to support sustainable and co-ordinated expansion of offshore wind."

Turning now to the two applications, I have no specific objection to their offshore elements, though they will need to meet the appropriate environmental assessment requirements, which I appreciate have been strengthened under this government as we do more to protect the natural marine environment. There is understandably a great deal of irritation that decisions of developers to apply for wind farms with DC connections, then switch to AC connections which leads to much greater demand for onshore infrastructure. The key issue then in both these applications is how best to connect these strategic offshore energy sites to the national grid.

Throughout the consultation stages, I have suggested alternatives to Scottish Power Renewables, including the proposed nuclear brownfield site at Bradwell, which would have meant less onshore cabling and substations in a more appropriate location. SPR have chosen not to pursue that, which in my view would have made their applications acceptable and are instead proposing a 32-metre wide cabling corridor across 9km of sensitive landscape with large substations on the edge of Friston village, without adequate landscaping.

The size and scale of the substations proposed at Friston, will have a devastating impact on the local environment including on local listed buildings which surround the substation site. Paragraph 151 of the National Planning Policy Framework (NPPF) states that 'plans for renewable energy should ensure that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts.' SPR's submission does not do that, especially when you consider all the other energy infrastructure which has been planned for this part of the Suffolk coast. This was the point made by the large number of people who attended my public meeting, which goes to show the strength of feeling locally.

There is also a danger that the substation will need to be even bigger than planned. While I understand it is the intention to use SF6 for cooling rather than air cooling to significantly reduce the size of the power stations, this cannot be taken for granted given the government's ratification of various amendments to the Montreal Protocol and the Kyoto Protocol, which aims to reduce significantly the use of fluorinated gases

as, if released, they are very potent greenhouse gases. SF6 is the most potent greenhouse gas, approximately 23,000 times the effect of CO2 on global warming. The alternative of using air-cooled infrastructure is much much larger (approximately six times the size of substation would be needed) and would be a far worse outcome.

When SPR first proposed Friston as a site for substations, while I do not think it an appropriate site, I was clear that at the very minimum – on the basis of planning conditions if the inspectorate was minded to recommend the DCO be granted - they should dig them into the ground to reduce the visual impact. This does not form part of their plans and their proposed planting to screen the development is woefully inadequate, especially when you take into consideration the growth rates of their landscaping mitigation. If the Inspectorate is minded to approve this application, I strongly suggest such conditions be made such that the effective height of the building would be no more than a standard three-storey house and that more mature trees would be needed for mitigation. The answer on landscaping mitigation would not just be leylandii conifers but should be at least mixed hardwood and softwood and would need to be in line with the UK Forestry Standard and the requirements of the environmental regulators.

The proposed cabling does not comply with paragraph 151 of the NPPF either, as instead of facilitating a connection to the grid as close to shore as possible, the proposal for 9km of underground cabling will cause a significant impact on the landscape including elements of the AONB and the removal of a section of protected woodland close to Aldringham Court, a grade II listed building. I understand that the width of the cable route will be reduced to 16.1m at sensitive locations but despite that, will also cause the loss of a number of hedgerows, interspersed by significant trees. This is in direct opposition to paragraph 170 of the NPPF, which calls for the protection and enhancement of valued landscapes.

I am also really concerned about the proximity of the cabling corridor to residential properties and have received correspondence from concerned constituents about the impact it will have locally. There are no details about how these works will be managed. There are also concerns about how the cabling comes onshore at Thorpeness and the impact of drilling on the stabilisation of the cliffs.

I also have significant concerns about the economic aspect of these proposals and the impact it will have on our precious tourism industry. The disruption of the onshore infrastructure will cause during the development phase and the lasting impact on the beauty of this part of Suffolk will have an impact on visitor numbers and the livelihoods of local residents.

My biggest concern though, continues to be the extent of which the cumulative impact of other energy infrastructure projects are also being taken into account. This is a key point in terms of site selection and on which myself and other parliamentary colleagues are actively lobbying government ministers.

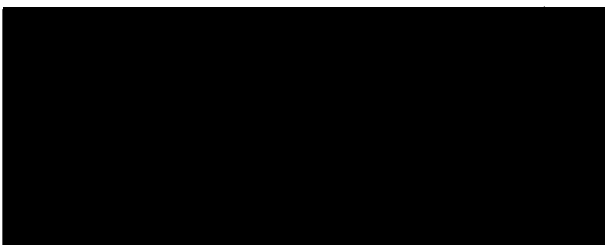
Earlier this summer the energy minister led him to announce an Offshore Transmission Network Review into how offshore energy firms bring their electricity back onshore to the national grid and how the planning system deals with that. As part of that review National Grid are now suggesting integrated connections – rather looking at onshore infrastructure in isolation. They state that there are significant environmental benefits to an integrated approach as the number of onshore landing points could potentially be reduced by around 50%. They also suggest that the majority of the technology required for integrated design is available now. Even more recently, proposals are being actively discussed and considered about offshore integration methods to minimise onshore landing points. While I am conscious, people in London may look to this area given our energy density, the very fact that we have a precious AONB and surrounding countryside should make it obvious that for future energy needs (where there isn't already an established sizeable cluster in terms of energy generation – as may be considered to be the case with nuclear generation) that this area should not become the energy dumping ground for onshore infrastructure.

I recognise that regulatory and legislative changes may need to be made to enact this but I feel strongly that this new emerging policy framework should at least be considered. In fact, the review report states that some changes to achieve an integrated network can take place within the current regime.

I want to recognise the efforts made by local councillors and local residents who have been meticulous and assiduous in making their case to me and to these planning applications. I encourage the Planning Inspectorate and Ministers to fully consider their detailed representations made in the interests of the natural environment and why this application is not the correct way to achieve the outcome we want and that actually this could be done better.

In conclusion, the impact of this proposal on the countryside, vital habitats, heritage assets, the amenities of local residents and tourism means I that I formally object to these DCO applications and I urge the Planning Inspectorate not to recommend them to the Secretary of State - rather that they are refused."

Yours sincerely,



Rt Hon Dr Therese Coffey MP

Member of Parliament for Suffolk Coastal