



## The Planning Act 2008

East Anglia One North (EA1N) and East Anglia Two (EA2) Offshore Wind Farms

Planning Inspectorate Reference: EA1N – EN010077 & EA2 – EN010078

Deadline 3 - 15 December 2020

East Suffolk Council's Summary of Oral Case from ISH1 and ISH2

**Issue Specific Hearing 1 – Biodiversity and Habitat Regulations Assessment – Summary of East Suffolk Council’s Oral Case**

Examining Authority’s Question	East Suffolk Council’s Response	References
<b>Agenda Item 1 – Welcome, introductions and arrangements for these Issue Specific Hearings 1</b>		
<b>Agenda Item 2 - The Applicants’ approach to Habitats Regulations Assessment (HRA) considerations</b>		
<ul style="list-style-type: none"> <li>For each of the proposed developments, the ExAs will ask the Applicant to present a brief summary of its understanding of the European sites, features and nature of potential effects for which its conclusion of no adverse effect on integrity is currently not agreed with Natural England (as the statutory nature conservation body).</li> </ul>		
<ul style="list-style-type: none"> <li>The ExAs will invite Natural England to confirm whether the Applicants’ summaries at item (a) reflect its own understanding of the status of agreements.</li> </ul>	East Suffolk Council (ESC) has no comments to provide and recognises this question is directed at Natural England.	
<ul style="list-style-type: none"> <li>The Applicants will be provided with a right of reply.</li> </ul>		
<b>Agenda Item 3 - Effects on Offshore Ornithology (including HRA considerations)</b>		
Questions will focus on the areas in which findings about effects are not agreed between the main parties.		
<p>a) Red-Throated Diver of the Outer Thames Estuary Special Protection Area (SPA)</p> <ul style="list-style-type: none"> <li>The ExAs will ask the Applicants to provide a brief update on any progress in</li> </ul>	ESC has no comments and defers to Natural England.	

<p>discussions on HRA findings since Deadline 2 and any work ongoing to address outstanding areas of disagreement.</p> <ul style="list-style-type: none"> <li>• The ExAs will ask the Applicants to explain their position in relation to further project-level mitigation if needed, such as that suggested in the relevant representations of Natural England [RR-059].</li> <li>• Natural England and any other relevant participants will be invited to comment.</li> <li>• The ExAs may ask questions about the Project Environmental Management Plan (PEMP) and the In-Principle Monitoring Plan (IPMP).</li> </ul>			
<p>b) Flamborough and Filey Coast SPA</p> <ul style="list-style-type: none"> <li>• In relation to Kittiwake, Gannet, Guillemot, Razorbill and the seabird assemblage, the ExAs will ask the Applicants to provide a brief update on any progress in discussions on HRA findings since Deadline 2 and any work ongoing to address outstanding areas of disagreement.</li> <li>• The ExAs will ask questions about the Applicants' Offshore Ornithology Cumulative and In Combination Collision Risk Update [REP1-047] and responses to</li> </ul>		<p>ESC has no comments and defers to Natural England.</p>	

<p>it received at Deadline 2, including those of Natural England.</p> <ul style="list-style-type: none"> <li>• The ExAs will explore views about the potential implications for the East Anglia ONE North and East Anglia TWO assessments of the identification by the Hornsea Project Three Offshore Wind Farm project of the Lowestoft-Aldeburgh coast as one of two ‘search zones’ for the siting of artificial nest structures as part of its proposed kittiwake compensation measures.</li> <li>• Natural England and any other relevant participants will be invited to comment.</li> </ul>			
<p>c. Lesser Black-Backed Gull of the Alde-Ore Estuary SPA</p> <ul style="list-style-type: none"> <li>• The ExAs will ask the Applicants to provide a brief update on any progress in discussions on HRA findings since Deadline 2 and any work ongoing to address outstanding areas of disagreement.</li> <li>• The ExAs will ask any questions about the Applicants’ Offshore Ornithology Cumulative and In Combination Collision Risk Update [REP1-047] (including changes to the Lesser Black-Backed Gull apportioning methodology for the Alde-Ore Estuary SPA), and responses to it</li> </ul>		<p>ESC has no comments and defers to Natural England.</p>	

<p>received at Deadline 2, including that of Natural England.</p>			
<ul style="list-style-type: none"> <li>• Further mitigation, assessment of alternatives, assessment of IROPI and examination contingencies             <ul style="list-style-type: none"> <li>• The ExAs will explore any scenarios in which a need may arise to identify and secure further HRA mitigation measures, or to engage with HRA Stages 3 and 42 , including examining a possible need to set out an assessment of alternative solutions and a case justifying Imperative Reasons of Overriding Public Interest (IROPI) and (where relevant) compensation.</li> <li>• Natural England and any other relevant participants will be invited to comment.</li> </ul> </li> </ul>		<p>ESC has no comments and defers to Natural England.</p>	
<ul style="list-style-type: none"> <li>• Monitoring             <ul style="list-style-type: none"> <li>• The ExAs will explore the proposed pre-construction and post-construction offshore ornithological monitoring to be secured within the draft DCOs and/or DMLs, including revisions expected at Deadline 3.</li> <li>• Natural England, the Marine Management Organisation and any other</li> </ul> </li> </ul>		<p>ESC has no comments and defers to Natural England and the Marine Management Organisation.</p>	

<p>relevant participants will be invited to comment.</p>			
<ul style="list-style-type: none"> <li>• Other offshore ornithological matters. <ul style="list-style-type: none"> <li>• The ExAs will ask the Applicants and Natural England for an update on the status of agreement on the outcomes of the Environmental Impact Assessment (EIA) with regard to offshore ornithological matters.</li> <li>• The ExAs may ask any other questions arising in relation to offshore ornithology matters.</li> <li>• The ExAs will invite submissions from any attendees who may wish to raise other matters in relation to offshore ornithological considerations.</li> </ul> </li> </ul>		<p>ESC has no comments and defers to Natural England.</p>	
<ul style="list-style-type: none"> <li>• The Applicants will be provided with a right of reply.</li> </ul>			
<p><b>Agenda Item 4 - Effects on Marine Mammals (including HRA considerations)</b>  Questions will focus on the areas in which findings about effects are not agreed between the main parties.</p>			
<p>a) Harbour porpoise of the Southern North Sea SAC.</p> <ul style="list-style-type: none"> <li>• The ExAs will ask the Applicants to provide a brief update on any progress in discussions on HRA findings since Deadline 2 and any work ongoing to</li> </ul>		<p>ESC has no comments and defers to Natural England and the Marine Management Organisation.</p>	

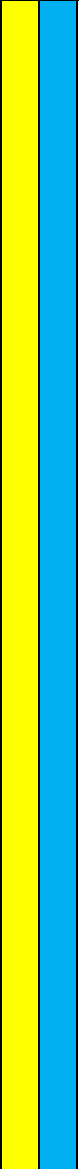
<p>address outstanding areas of disagreement.</p> <ul style="list-style-type: none"> <li>• The ExAs will explore views about the potential disturbance effects of each project alone (construction, operation and decommissioning stages) with regard to underwater noise impact thresholds on the Southern North Sea SAC.</li> <li>• The ExAs will explore issues relating to the potential disturbance effects of each project in combination with other plans and programmes, including updated assessments submitted at Deadline 1 [REP1-038], and any responses submitted at Deadline 2.</li> <li>• Natural England, the Marine Management Organisation, The Wildlife Trusts and any other relevant participants will be invited to comment.</li> </ul>			
<p>b) Unexploded Ordnance (UXO) clearance</p> <ul style="list-style-type: none"> <li>• The ExAs will explore issues relating to the proposed approach of including UXO clearance activities within the Deemed Marine Licences.</li> <li>• Natural England, the Marine Management Organisation, The Wildlife Trusts and any other relevant participants will be invited to comment.</li> </ul>		<p>ESC has no comments and defers to Natural England and the Marine Management Organisation.</p>	

<p>c) Mitigation and monitoring</p> <ul style="list-style-type: none"> <li>• The ExAs will raise any questions relating to the content of the draft In-Principle Site Integrity Plans and how they would be secured by the provisions of the DCO/DMLs.</li> <li>• The ExAs will explore matters in relation to the draft Marine Mammal Mitigation Protocols and how they would be secured by the provisions of the DCO/DMLs.</li> <li>• Natural England, the Marine Management Organisation, The Wildlife Trusts and any other relevant participants will be invited to comment.</li> </ul>		<p>ESC has no comments and defers to Natural England and the Marine Management Organisation.</p>	
<p>d) Other marine mammal matters</p> <ul style="list-style-type: none"> <li>• The ExAs may ask other questions in relation to marine mammals matters.</li> <li>• The ExAs will invite submissions from any attendees who may wish to raise other matters in relation to marine mammal considerations.</li> </ul>			
<p>e) The Applicants will be provided with a right of reply.</p>			
<p><b>Agenda Item 5 - Effects on Subtidal and Intertidal Benthic Ecology</b>          Questions will focus on the areas in which findings about effects are not agreed between the main parties.</p>			






<ul style="list-style-type: none"> <li>• Outer Thames Estuary Special Protection Area (SPA) as a supporting habitat for qualifying features</li> <li>• The ExAs will ask the Applicants to provide a brief update on HRA findings since Deadline 2 and any work ongoing to address outstanding areas of disagreement.</li> <li>• The ExAs will ask Natural England and the Marine Management Organisation to confirm whether the Applicant’s update reflects their own understanding of the status of agreements.</li> <li>• The ExAs will explore concerns raised by Natural England of the impact of sandwave levelling and cable protection on features of the Outer Thames Estuary SPA.</li> </ul>		<p>ESC has no comments and defers to Natural England and the Marine Management Organisation.</p>	
<ul style="list-style-type: none"> <li>• The ExAs will ask the Applicants to provide a brief update on HRA findings since Deadline 2 and any work ongoing to address outstanding areas of disagreement.</li> </ul>			
<p>b) Sabellaria spinulosa</p> <ul style="list-style-type: none"> <li>• The ExAs will ask the Applicants, Natural England and the Marine Management Organisation to provide a brief update on any work ongoing to address outstanding</li> </ul>		<p>ESC has no comments and defers to Natural England and the Marine Management Organisation.</p>	

<p>areas of disagreement on the Outline Sabellaria Reef Management Plan [REP1-044].</p>			
<p>c) The Applicants will be provided with a right of reply.</p>			
<p><b>Agenda Item 6 - Effects on Terrestrial Ecology</b></p>			
<p>a) Nightjar and Woodlark of the Sandlings SPA</p> <ul style="list-style-type: none"> <li>• The ExAs will ask the Applicants to provide a brief update on HRA findings since Deadline 2 and any work ongoing to address outstanding areas of disagreement.</li> <li>• The ExAs will ask Natural England to confirm whether the Applicant’s update reflects its own understanding of the status of agreements.</li> <li>• The ExAs will explore the SPA crossing method and habitat reinstatement with the Applicants, Natural England, the Councils, interest groups and any other relevant participants with particular regard to outstanding concerns raised by Natural England at Deadline 1 [REP1-163] and at Deadline 2.</li> </ul>		<p>ESC understands the Applicants’ position on the two SPA crossing options and the desire to utilise an open cut trench method. ESC considers that in principle the methodologies identified for both crossing options set out in the Outline SPA Crossing Method Statement (submitted at Deadline 1) are adequate for the works proposed under both options, subject to the Deadline 2 comments made by stakeholders being addressed. ESC acknowledges the Applicants’ reasoning behind the preference for the use of open cut trenching and considers that, on balance, this method would overall present the least impact to all receptors (ecological or otherwise).</p> <p>Whilst the use of a trenchless option would appear to remove the need to for works within the SPA boundary, it remains unclear to what degree ground investigations (Outline SPA Crossing Method Statement (REP1-043 para.116) in the SPA would be required. Such investigations could require levels of access and work within the SPA which would result in significant habitat damage.</p>	<p>Outline SPA Crossing Method Statement (REP1-043).</p>
<p>b) Onshore ornithology and other terrestrial ecology</p>		<ul style="list-style-type: none"> <li>• Proposed turtle dove and nightingale mitigation is set out in the draft SPA Crossing Method Statement. ESC’s current</li> </ul>	<p>Outline SPA Crossing Method</p>

<ul style="list-style-type: none"> <li>• The ExAs will ask the Applicants for an update on the status of agreement on the content of the Environmental Statement with regard to onshore ornithological matters and other terrestrial ecology, including but not limited to: -</li> <li>• Turtle dove mitigation</li> <li>• Nightingale mitigation</li> <li>• Hundred River crossing</li> <li>• Leiston to Aldeburgh SSSI</li> <li>• Protected species</li> <li>• Trees and woodland</li> <li>• Ecological enhancement</li> <li>• Pre-construction surveys</li> <li>• Cumulative/in-combination effects – projects scoped in and update following submission of the application for the Sizewell C Project.</li> <li>• Natural England, the Councils, interest groups and any other relevant participants will be invited to comment.</li> </ul>		<p>comments on this are as per those set out in our Deadline 2 response (REP2-029).</p> <ul style="list-style-type: none"> <li>• A method statement for crossing of the Hundred River is to be provided at Deadline 3 and therefore we are unable to comment on this matter in detail. We will review this document once submitted and provide comment at a later deadline.</li> <li>• The Leiston-Aldeburgh SSSI is crossed at the landfall and the SPA crossing, draft method statements for both these areas were provided at Deadline 1 and ESC has provided comment on these at Deadline 2 (REP2-029).</li> <li>• Protected species – Bats – ESC remains concerned that the cable corridor construction works will result in a longer temporary impact on foraging and commuting bats than presented in the Environment Statements (due to the amount of time it will take replacement habitat to grow). Additional construction mitigation measures put forward by the Applicants as part of the Statement of Common Ground process may help address this, the details of these are required as part of an updated Outline Landscape and Ecological Management Strategy (OLEMS). It is understood that an updated OLEMS will be provided at Deadline 3.</li> </ul> <p>ESC also considers that the impacts of operational noise at the substations, on species including bats, remains inadequately assessed. It is understood that further information on this will be provided by the Applicants at Deadline 3.</p>	<p>Statement (REP1-043).</p> <p>Outline Landfall Construction Method Statement (OLCMS) (REP1-042)</p> <p>Ecological Enhancement Clarification Note (REP1-035)</p> <p>ESC Deadline 2 Response (REP2-029)</p>
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		<ul style="list-style-type: none"> <li>• As set out in our Written Representation, Local Impact Report (LIR) and Deadline 1 and 2 responses, ESC remains concerned that the mitigation and compensation planting proposed may not mature as quickly as presented in the Environmental Statements. Therefore, the length of time before adequate levels of mitigation/compensation planting growth has been achieved will be greater than that presented.</li> <li>• ESC’s comments on the Applicants’ Ecological Enhancement Clarification Note were provided in our response at Deadline 2 (REP2-029).</li> <li>• Pre-construction surveys – ESC agrees with the broad scope of the required preconstruction surveys set out in the OLEMS. However, we remain concerned that Requirement 21 as drafted does not require that Ecological Management Plan(s) (EMP(s)) are based on pre-construction surveys, only that they are in accordance with the Environmental Statements.</li> <li>• In-combination effects with Sizewell C, particularly in relation to bats, require updating.</li> </ul>	
<p>c) The Applicants will be provided with a right of reply.</p>			
<p><b>Agenda Item 7 - Any other business relevant to the Agenda</b>                  The ExAs may raise any other topics bearing on biodiversity and HRA as is expedient, having regard to the readiness of the persons present to address such matters.</p>			

<p>The ExAs may extend an opportunity for participants to raise matters relevant to the topic of these hearings that they consider should be examined by the ExAs.</p> <p>If necessary, the Applicants will be provided with a right of reply.</p>		
<p><b>Agenda Item 8 - Procedural decisions, review of actions and next steps</b></p>		
<p>The ExAs will review whether there is any need for procedural decisions about additional information or any other matter arising from Agenda items 2 to 7.</p> <p>To the extent that matters arise that are not addressed in any procedural decisions, the ExAs will address how any actions placed on the Applicants, Interested Parties or Other Persons are to be met and consider the approaches to be taken in further hearings, in the light of issues raised in these hearings. A written action list will be published if required.</p>		
<p>Agenda Item 9 Close of the hearings</p>		

**Issue Specific Hearing 2 – Onshore Siting, Design and Construction – Summary of East Suffolk Council’s Oral Case**

Examining Authority’s Question	East Suffolk Council’s Response	References
<b>Agenda Item 1 – Welcome, introductions and arrangements for these Issue Specific Hearings 2</b>		
<b>Agenda Item 2 – Context and Update</b>		
<p>In the light of the time that has elapsed since the acceptance of the two applications for examination, the Applicant and other IPs are invited to provide an update on the information provided to the ExA on external changes which have occurred since the submission of the applications and their relationship and effect, if any, on the projects, including but not limited to:</p>		
<p>a) Recent decisions by the SoS BEIS on energy proposals in the Eastern and South Eastern regions</p>	<p>ESC are aware that the Secretary of State recently:</p> <ul style="list-style-type: none"> <li>• refused the Thanet Extension Offshore Wind Farm,</li> <li>• approved the Norfolk Vanguard Offshore Wind Farm on 1 July 2020 (although this is subject to a judicial review challenge),</li> <li>• and issued a ‘Minded to Approve’ decision in relation to Hornsea Project 3 Offshore Wind Farm with a final decision expected 31 December 2020.</li> </ul> <p>The Examiners Report and Secretary of State’s decision in relation to Norfolk Boreas Offshore Wind Farm is also expected early next year.</p> <p>There is potential for the construction periods of these projects to overlap with the construction periods of EA1N and EA2 which could result in cumulative impacts in relation to employment and port related traffic if the projects were all constructed at the same time. ESC has however not raised this as a significant issue as there will be positive economic and skills benefits and</p>	<p><a href="https://www.gov.uk/government/news/energy-infrastructure-development-applications-decisions-gov-uk">Energy infrastructure development applications: decisions - GOV.UK (www.gov.uk)</a></p>

	<p>acknowledges that all the projects have suffered delays in their consenting process, the projects could therefore equally provide a pipeline of construction work and measures can be put in place through engagement with the Applicants to address these matters should construction timeframes overlap.</p> <p>By working together with the Applicants, we are of the view that the Memorandum of Understanding agreed between the Council, SCC and SPR can provide an appropriate vehicle with sufficient inbuilt flexibility to help ensure the positive skills, education and employment cumulative impacts of the projects are maximised especially for the nearest port and town of Lowestoft and surrounding area including Great Yarmouth.</p> <p>The Applicants have not yet specified a port so further consideration of the traffic implications is not possible at this stage. There is a Requirement within the draft Development Consent Orders (DCOs) which seeks a Port Travel Plan (Requirement 36) and it is understood the Applicants will be providing an Outline Port Travel Plan at Deadline 3. This matter is therefore still being discussed with the Applicants.</p>	
<p>b) The acceptance of examination of proposals for Sizewell C, and the implications of this and any further progress in the decommissioning of Sizewell A and changes to Sizewell B</p>	<p><u>Sizewell C</u></p> <p>The Sizewell C DCO was submitted and accepted earlier this year. It is not clear at the present time when the examination will begin. EDF Energy undertook a 30 day consultation on changes proposed to their DCO which ended on 12 December 2020. There is potential for cumulative impacts to result from Sizewell C together with EA1N and EA2 projects in relation to:</p>	<p><a href="#">Sizewell C</a>   <a href="#">EDF (edfenergy.com)</a></p>

		<ul style="list-style-type: none"> <li>• Air quality – We are currently considering the cumulative impact on air quality at the Stratford St Andrew Air Quality Management Area (AQMA). The increase in Heavy Goods Vehicle (HGV) traffic resulting from the Sizewell C proposals has led EDF Energy to propose a two-village bypass on the A12 bypassing the villages of Stratford St Andrew and Farnham. Should the development of Sizewell C proceed on its predicted timeline, there is potential for the bypass to be in place and mitigate potential increases in NO<sub>2</sub> in the Stratford St Andrew Air Quality Management Area (AQMA). However, if it does not there is a concern that the additional HGV movements in this location could trigger an unacceptable increase in NO<sub>2</sub> in this locality. We are currently reviewing the Traffic and Transport Sizewell Cumulative Impact Assessment document and engaging with the Applicants for these projects and Sizewell C on this matter and are hopeful we can reach agreement.</li> <li>• Tourism – we provided comments on the Socio-economic Clarification Note at Deadline 2, we are also continuing to engage with the Applicants in relation to the Council’s concerns regarding the cumulative impact on visitor perceptions, this is subject to ongoing discussions and we are hopeful that this can also be resolved.</li> <li>• Bats – we are engaging with the Applicants on this matter.</li> <li>• Landscape and Visual Amenity – we note the Applicants provided an update to their Cumulative Impact Assessment at Deadline 2 which addresses this matter.</li> </ul>	<p>Sizewell Projects Cumulative Impact Assessment (Traffic and Transport) - REP2-009</p> <p>Socio-economic Clarification Note (SZC CIA) - REP1-036 ESC Deadline 2 Response REP2-029</p> <p>Landscape and Visual: Sizewell C Cumulative Impact Assessment –REP2- 010</p>
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	<ul style="list-style-type: none"> <li>• Traffic and Transport – we note the update to the CIA provided and we defer to Suffolk County Council on this matter.</li> </ul> <p><b>The below information was not stated at the hearing but is provided for background information.</b></p> <p><u>Sizewell B</u></p> <p>The Council can confirm there remains an extant planning permission to relocate some facilities across the Sizewell B power station site. This will then allow Sizewell C to use the land where the existing facilities are located. Construction is identified to begin in 2022 with peak construction the same year. A revised application has also been submitted (DC/20/4646/FUL). Peak construction is not predicted to overlap but the Sizewell C DCO includes consideration of this development anyway, albeit not the revised scheme, and therefore this has already been considered as part of the Applicants CIA with Sizewell C.</p> <p><u>Sizewell A</u></p> <p>Sizewell A site has entered a period of decommissioning. This site was considered and discounted by the Applicants early on in pre-application discussions due to concerns regarding the available space and likely restrictions imposed by the existing license conditions. We accepted the Applicants reasoning for this.</p>	<p>Sizewell C Project CIA (Traffic and Transport) REP2-009</p> <p>Planning permission DC/19/1637/FUL</p> <p><a href="#">DC/19/1637/FUL   1. In outline, comprising a Visitor Centre (maximum 2,000sq.m GEA) and a maximum of 9,500sq.m (GEA) of floorspace to provide administration, storage, welfare and canteen facilities with all matters reserved apart from access. 2. In full, for the demolition of the existing Outage Store, Laydown Area, Operations Training Centre, Technical Training Facility, Visitor Centre, and Rosery Cottage garage; removal of technical training and pool car park (63 spaces).</a></p>
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			<p><a href="#"><u>Coronation Wood car park (21 spaces), Visitor Centre car park (16 spaces) and northern outage car park (576 spaces); meantime use of the Technical Training Centre as an interim Visitor Centre followed by its demolition; and erection of new (all floorspace in GEA) Outage Store (2,778sq.m), Laydown Area (11,990sq.m) including New Western Access Road, Yardman's Office (23sq.m), Training Centre (4,032sq.m), Rosery Cottage garage (30sq.m), Replacement Car Park (2,363sq.m) providing 112 spaces, and Outage Car Park (15,525sq.m) providing (576 spaces) including new access road (and alternative access to bridleway), footpath and amended junction at Sizewell Gap; and associated landscaping</u></a></p>
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			<p><a href="#">earthworks/recontouring, tree felling and boundary treatment.   Sizewell B Power Station Complex And Adjoining Land Sizewell Power Station Road Sizewell Leiston Suffolk IP16 4UR (east Suffol.gov.uk)</a></p> <p>Planning application DC/20/4646/FUL</p> <p><a href="#">DC/20/4646/FUL   Hybrid application seeking outline planning permission, with all matters reserved, for up to 9,500 square metres Gross External Area (GEA) to provide administration, storage, welfare and canteen facilities and a visitor centre of up to 1,000 square metres GEA. Detailed planning permission is sought for demolition of some existing structures and redevelopment to include a training centre and</a></p>
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			<p><a href="#">interim visitor centre, an outage store, lay down area, car and cycle parking, landscaping, associated infrastructure (including utilities, plant and highway works), tree felling and other relevant works.   Sizewell B Sizewell Power Station Complex And Adjoining Land Sizewell Power Station Road Sizewell Leiston Suffolk IP16 4UR (eastsoffolk.gov.uk)</a></p>
<p>c) Crown Estate licensing agreements in respect of proposed offshore windfarms including Five Estuaries and North Falls</p>		<p>The Examining Authority will have seen in the Council’s LIR and responses to your first round of questions, that we have concerns regarding the cumulative impacts of the proposed projects with other energy projects which have connection offers at Friston.</p> <p>We understand that North Falls and Five Estuaries Offshore Wind Projects both signed an Agreement for Lease with the Crown Estate during the summer this year. We are also aware that Five Estuaries Offshore Wind Farm (formerly known as Galloper Extension Project) has a connection offer at Friston should the National Grid substation proposed under these projects be consented. It is understood that the connection offer in relation to North Falls will be confirmed early next year.</p>	<p>ESC and SCC Joint LIR – paragraphs 6.43-6.57 (REP1-132)</p> <p>ESC’s responses to ExQ1 1.0.18, 1.14.5 and 1.14.6 – Deadline 1 (REP1-131)</p> <p><a href="#">Seabed rights awarded for offshore wind extension projects   The Crown Estate</a></p>

	<p>In addition to these projects, the Council is also concerned about the cumulative impacts of the projects with the Nautilus and Eurolink Interconnectors, which it is also known are intended to be connected at Friston but these are discussed in response to Item 1 (d).</p> <p><u>North Falls</u></p> <p>The Agreements for Lease between North Falls Offshore Wind Farm (NFOWF) and The Crown Estate was signed in summer 2020. NFOWF aim to sign a connection agreement with National Grid in 2021. The final stages of the feasibility consenting activity is anticipated to commence in January 2021. <a href="#">EN010119-Advice-00001-1-201106 North Falls Inception Meeting Note FINAL.docx.pdf (planninginspectorate.gov.uk)</a></p> <p><u>Five Estuaries</u></p> <p>The Agreement for Lease between Five Estuaries and The Crown Estate has also been signed since the submission of the applications.</p> <p>National Grid’s TEC register identifies that Five Estuaries has a connection offer and this was stated to be at Friston should the National Grid substation, the subject of the current EA1N and EA2 DCOs, be consented.</p> <p>There is limited information available in the public domain regarding this project, but the Council considers that National</p>	<p>See Council’s response to ExQ1 1.14.5 Deadline 1 (REP1-131)</p>
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		<p>Grid could provide details of the land take required to connect a 353MW capacity offshore wind project to the National Grid substation.</p> <p>The Council maintains that as the National Grid substation is being considered as a strategic connection point for multiple projects (Nautilus, Eurolink, Five Estuaries and potentially North Falls), the effects of these connections on the design of the National Grid substation and associated impacts should be fully considered.</p> <p>ESC has subsequent to the hearing seen that the Developer of the Five Estuaries project has received s51 advice from the Planning Inspectorate. It is noted that this advice identifies that the point of connection is still being discussed, the Council however did not understand this to be the case.</p> <p><a href="#">EN010115-Advice-00001-1-191128 Galloper Extension. Meeting note.pdf (planninginspectorate.gov.uk)</a></p>	<p><a href="#">Connection registers, reports, and guidance   National Grid ESO</a></p>
<p>d) National Grid structure, policy and plans in the local area, including their strategic function and future plans for the proposed substation and Grid connection site and the potential impact of Sizewell C.</p>		<p>ESC is aware that connection offers have been given to Nautilus Interconnector and Eurolink Interconnector in addition to Five Estuaries Offshore Wind Farm. The Council maintains that as the National Grid substation proposed by EA1N and EA2 is being considered as a strategic connection point for multiple projects, the effects of these connections on the design of the National Grid substation and associated impacts should be fully considered.</p> <p>We know from a Q&amp;A document published May 2020 on the National Grid Venture’s website that the typical maximum land</p>	<p><a href="#">download (nationalgrid.com)</a></p>

		<p>take required to facilitate a connection to the National Grid substation would be 1.3 hectares for each connection offered. It is also considered that National Grid could provide the maximum height of the infrastructure needed based on the design of the National Grid substation currently proposed and their own knowledge and experience. This Rochdale envelope could then be utilised for a CIA.</p> <p>It is our view that these projects are reasonably foreseeable and that they should be taken into account in the CIA.</p> <p>It is accepted that circumstances in relation to specific projects may change in the future, but this is true of any project and does not negate the need for a full and proper assessment of the cumulative impacts to be undertaken at this stage in relation to reasonably foreseeable projects.</p> <p>The Council maintains that as the National Grid substation proposed by EA1N and EA2 is being considered as a strategic connection point for multiple projects, the effects of these connections on the design of the National Grid substation and associated impacts should be fully considered.</p>	
<p>e) Developments in energy policy, including the National Grid ESO Offshore Coordination Project and the BEIS Offshore Transmission Network Review, including whether the development of any 'offshore ring main' (ORM) or other</p>		<p>ESC in conjunction with SCC has continued to express concerns regarding the uncoordinated piecemeal approach to energy related development and grid connections offered in letters written to Government since 2018. The letters highlight the need for a more strategic look at the locations where cables make landfall and connect to the grid, rationalising these and taking a</p>	<p>Letters to Government have been provided in Appendix A.</p> <p>ESC and SCC Joint LIR paragraphs 6.30-6.32 (REP1-132)</p>

<p>alternative connection development projects which it has been argued might serve the proposed developments are now or might in relevant timescales become serious possibilities to which the Applicant and the SoS might reasonably have regard.</p>	<p>longer term view of opportunities. We have been pushing with SCC for this more coordinated approach.</p> <p>The letters identified a number of the projects we are currently now discussing and raised concerns about the piecemeal approach with each application effectively proceeding in its own silo. One issue that was highlighted was the location of the grid connection and the long term consequences of this including cumulative impacts that would arise. In light of these concerns, we welcome the work which BEIS has started with the Offshore Transmission Network Review and National Grid Electricity System Operator’s Offshore Coordination Project which are ongoing. NG-ESO’s work has highlighted the potential significant reduction in connection infrastructure as a result of their integrated vision.</p> <p>Whilst it would be preferable to integrate the connection of EA1N and EA2 with emerging offshore network recommendations and ultimate enduring regime, we accept that this is not likely to be feasible in practice due to the relative timings of the work and maturity of EA1N and EA2 proposals.</p> <p>We however recognise that this work will have more significant implications for projects connecting after 2030 and potentially Round 4 projects and less mature projects. As part of this review BEIS and Ofgem wrote an open letter in August this year seeking engagement with developers who are pursuing coordination or have an opportunity to do so. We see this work as providing an opportunity for the Applicants to see if by working with</p>	<p><a href="https://www.gov.uk/government/news/offshore-transmission-network-review">Offshore transmission network review - GOV.UK (www.gov.uk)</a></p> <p><a href="https://publishing.service.gov.uk/government/news/increasing-the-level-of-coordination-in-offshore-electricity-infrastructure">Increasing the level of coordination in offshore electricity infrastructure (publishing.service.gov.uk)</a></p> <p><a href="https://www.ngeco.gov.uk/Offshore-Coordination-Project-National-Grid-ESO">Offshore Coordination Project   National Grid ESO</a></p> <p><a href="https://publishing.service.gov.uk/government/news/increasing-the-level-of-coordination-in-offshore-electricity-infrastructure">Increasing the level of coordination in offshore electricity infrastructure (publishing.service.gov.uk)</a></p>
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		<p>Government options for greater coordination or consolidation of the projects could be explored. We recognise that this is on an 'opt in' basis and therefore we would invite the Applicants to undertake this engagement. We would welcome any opportunities available to minimise the adverse impacts of the projects. Also, in light of the movement towards greater coordination, we would invite the Applicants to ensure they do not proceed with their projects in isolation but rather take account of the future projects we know are likely to be coming forward.</p> <p>Although these National Policy Statements (NPS EN-1, EN-3, EN-5) predate the recent change to Net Zero by 2050, whilst it would be preferable for these to be reviewed and updated as soon as possible, ESC accept that these comprise the current policy framework.</p> <p>Post ISH2 ESC note that the Energy White Paper was published on 14 December 2020 and contained a commitment to review the NPSs by the end of next year. The Council therefore recognise there is the potential for a final decision to be reached on these projects after the adoption of updated policy statements. We therefore wish to reserve the right to provide further comment in light of any new policy changes should this occur.</p>	
<p>The ExAs will invite submissions from invited IPs and Other Persons who wish to raise matters in relation to this item.</p>			

<p>The Applicant will be provided with a right of reply. This item will draw on responses to the ExA’s First Written Questions [PD-018], including but not limited to 1.0.17-1.0.18, 1.14.1 to 1.14.3, and 1.14.5 to 1.14.6.</p>			
<p><b>Agenda Item 3 – Strategic Siting - Approach</b>                  The ExAs will ask the Applicant to present the approaches taken to each project’s onshore components, with respect to:</p>			
<p>a) The choice to make a new onshore connection, as opposed to utilising/expanding existing connections at Bawdsey or creating new connections elsewhere.</p>		<p>We have our own concerns regarding the Connection and Infrastructure Options Note (CION) process more generally and whether it remains fit for purpose, in respect of handling strategic and environmental issues. The point of connection is a crucial consideration of any project and directly dictates the broad locality of the onshore infrastructure, but the implications of this decision are not robustly assessed at this point. This a significant flaw in the process. It is noted that the BEIS OTNR work is seeking to look at potential changes to the CION process, but it is not yet clear how any changes would affect existing and future connections.</p> <p>Notwithstanding our concerns regarding the CION process, we recognise that the connection offers made for EA1N and EA2 projects are valid under the current regime and that these are not subject of approval by the Examining Authority.</p>	
<p>b) The specific need for, and justification of, locations of landfall at Thorpeness and</p>		<p><u>Landfall Location</u></p>	<p>ESC and SCC LIR Section 10 paragraphs 10.10 to 10.19 consider landfall.</p>

<p>substations/transmission systems connections, including the proposed National Grid substation and connections to the grid at land north of Friston. To include details of the strategic decision-making process for the proposed locations and their generation capacities – why were the sites chosen, and in what order?</p>	<p>We accept the Applicants justification for the landfall location and commitment to an appropriate set-back for the infrastructure to take account of coastal processes, and avoidance or minimisation of the projects’ interaction with the Coraline Crag outcrop. With the exception of relatively minor updates recommended to the draft DCOs set out in our LIR paragraph 10.20, we do not have any outstanding concerns regarding the landfall.</p> <p>We also welcome the Applicants commitment in the Project Update Note submitted at Deadline 2 that should the projects be constructed sequentially, the ducting for the second project will be laid at the same time as the cabling for the first.</p> <p>During the hearing the Applicants did raise the potential for the use of alternative techniques other than Horizontal Direction Drilling (HDD), the Outline Landfall Construction Method Statement has however been written on the basis of the deployment of this technique. Further clarification on this matter is required.</p> <p><u>Substations/Transmission System Connections</u></p> <p>The Council raised concerns regarding the process which lead to the identification of the substations site at Friston. In particular the Council considered that the site selection area was initially too narrow and requested the search area be expanded. Specifically, the Council requested the inclusion of a site adjacent</p>	<p>Paragraph 10.20 sets out outstanding matters (REP1-132).</p> <p>Project Update Note (REP2-007)</p> <p>Outline Landfall Construction Method Statement (REP1-042)</p> <p>Links to the Council’s consultation responses are provided below:  <a href="#">SPR-Formal-Stage-1-response.pdf</a>  <a href="http://eastsoffolk.gov.uk">eastsoffolk.gov.uk</a></p>
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	<p>to the existing energy infrastructure of the Galloper and Greater Gabbard substations and near Sizewell A and B power stations, known as Broom Covert, Sizewell. We also requested that detailed assessment work was undertaken prior to site selection decisions being made.</p> <p>The Applicants however identified the Friston site as their preferred choice during their Phase 3 consultation prior to more detailed work being undertaken.</p> <p>The Applicants did eventually include the Broom Covert, Sizewell site for consideration at their Phase 3.5 consultation but rejected it in favour of Friston. The Council asked for additional comparative analysis of the two sites before any decision was made, specifically:</p> <ul style="list-style-type: none"> <li>• LVIA for both sites</li> <li>• Further consideration of the connection infrastructure required for both sites</li> <li>• And further work regarding the Aldringham crossing and impacts on the Grade II listed Aldringham Court.</li> </ul> <p>This further work was however not undertaken either. The Council considered at the time of the Phase 3.5 consultation that the Broom Covert, Sizewell site was the 'least worst option'. It was considered, based on the information available, that the alternative site offered a greater opportunity to minimise and mitigate the harm caused by the development when compared to the Friston site.</p>	<p><a href="#">Microsoft Word - 2018-08-23 Response on Stage 3 (eastsoffolk.gov.uk)</a></p> <p><a href="#">Microsoft Word - 2018-11-08 Response to s3.5 final draft (2) (eastsoffolk.gov.uk)</a></p> <p><a href="#">Phase-4-Consultation-Response-from-SCC-and-SCDC-26.03.19.pdf (eastsoffolk.gov.uk)</a></p>
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	<p>As you will see from our Local Impact Report and Relevant Representation, we have raised a number of significant concerns regarding the impacts of the substations on the Friston site, particularly regarding:</p> <ul style="list-style-type: none"> <li>• Landscape and visual impacts</li> <li>• Setting of heritage assets</li> <li>• Operational noise</li> <li>• Substation design</li> <li>• Cumulative impacts</li> <li>• And other matters such as public rights of way and flood risk matters which SCC will take the lead on.</li> </ul> <p>The Council has been engaging with the Applicant in order to seek to minimise the impacts of the developments and seek appropriate mitigation and where necessary compensation.</p> <p>The Examining Authority asked a follow up question as to whether the Council considered that the applications would be acceptable if another location were used?</p> <p>In response, ESC stated that we would have liked further assessment of other sites to have been provided but without the detail of this further assessment, we cannot categorically state that an alternative site would have been acceptable. The analysis in order to enable this view to be provided was not undertaken.</p>	<p>ESC Relevant Representation (RR-002) &amp; Joint LIR (REP1-132)</p>
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<p>c) Justification for the proposed cable alignments – was this as a result of the chosen landfall and substation locations? What rationale was used in the decision-making process of routes or ways to link up the chosen locations?</p>		<p><u>Cable Alignment</u></p> <p>The Council has no significant concerns regarding the cable alignment chosen by the Applicants. The adoption of the same onshore Order Limits for both projects, the crossing of the SPA/SSSI at its narrowest point, and the Applicants commitment that should the projects be constructed sequentially, the ducting for the second project will be laid at the same time as the cabling for the first are welcomed.</p> <p>The cable alignment does however result in the Order Limits and therefore construction activities being in close proximity to a number of residential properties. We therefore request that the Outline Code of Construction Practice recognises this and commits to carefully manage and provide additional mitigation measures in these sensitive localities should they be required. The specific areas in question have been highlighted in the Councils LIR.</p>	<p>Project Update Note (ExA.A.S-4.D2.V1) (REP2-007)</p> <p>ESC and SCC LIR paragraphs 19.5, 19.14 and 19.34 (REP1-132)</p>
<p>The presentation should include details on the reasons for changed strategies in relation to landfall and grid connection locations and how these were evaluated; evaluation criteria in assessing alternative substation locations and their potential for mitigation; and strategic justification of the Rochdale envelope and land required for the development north of Friston.</p>			

<p>The ExAs will invite submissions from invited IPs and Other Persons who wish to raise matters in relation to this item.</p> <p>The Applicant will be provided with a right of reply.</p> <p>This item will draw on responses to the ExA's First Written Questions [PD-018], including but not limited to 1.0.17-1.0.19, 1.14.1 to 1.14.3, and 1.14.5 to 1.14.</p>			
<p><b>Agenda Item 4 – Local Siting – Impacts and Mitigation</b></p>			
<p>The ExAs will wish to explore the following matters relevant to onshore siting and design with the Applicant including, but not limited to:</p>			
<p>a) Design and impact of the proposed landfall and cable alignments on:</p> <ul style="list-style-type: none"> <li>• the Suffolk Coast AoNB</li> <li>• Heritage Assets</li> <li>• Public Rights of Way (PRoW) and local landscape implications</li> </ul>		<p><u>Suffolk Coast AONB</u></p> <p><b>The following comment was not stated during the hearing but remains the view of ESC</b> - Limiting our comments to the Suffolk Coast AONB, it is accepted that the landfall site and cable corridor as far as it falls within the AONB boundary, will have an adverse impact on landscape character and visual amenity, as well as a number of the special qualities that characterise the AONB. However, it is accepted that these are temporary impacts. Subject to a suitable and correctly implemented land restoration programme, these adverse impacts will be mitigated and will have no significant long term impacts.</p> <p><u>Heritage Assets</u></p>	

The Council agrees with the Applicants' assessment of an adverse impact of negligible magnitude on Aldringham Court, giving rise to an effect that would be of minor significance in EIA terms.

The cable alignments would impact the setting of the Grade II Aldringham Court. A section of woodland to the south of the listed building would be removed to accommodate the development, which could not be fully replanted. The grounds are part of the architect's original design and this designed garden setting contributes to the understanding of the significance of the building. The loss of part of the original design would alter this setting. However, it is recognised that there is currently a high degree of visual separation between the building and this piece of land due to the large laurel hedge that forms a boundary to the formal gardens to the front and side of Aldringham Court. The Council therefore does not consider that the loss of part of the garden design would amount to harm to the significance of the designated heritage asset.

#### Local Landscape

The Council accepts there is unlikely to be any lasting impacts on the landscape character, including AONB, subject to the carrying out of detailed hedgerow and arboricultural assessments in consultation with us and agreement of a suitable restoration programme post consent, in order to minimise the impacts on the existing landscape fabric. We confirmed we would seek input from an arboricultural clerk of works during the cable route construction works which would be secured through the OLEMS.



		<p>We also confirmed that we would seek cooperation from the Applicants engineers on micro-siting options for cable alignment including trenchless options for cabling under the most important hedgerows and root zones of important landmark trees.</p> <p><b>The following comment was not stated during the hearing but remains the view of ESC</b> - In the vicinity of Aldringham Court, it is accepted that the character of the landscape in this locality will change because of the need to remove existing tree cover, but the restoration to acid grassland and heath scrub is a suitable alternative.</p>	
<p>b) Design and impact of the proposed substations/transmission systems connections, including the proposed National Grid substation and connections to the grid, specifically in terms of:</p> <ul style="list-style-type: none"> <li>• Overarching siting and design issues</li> <li>• Landscape and Visual Impact, including upon PRowS</li> <li>• Historic Environment</li> <li>• Achieving good design</li> </ul>		<p><u>Overarching design matters</u></p> <p>EA1N and EA2 Substations</p> <p>The Council welcomes the Applicants commitment at Deadline 2 to reduce the footprints of the onshore project substations to 190m x 170m. We also welcome the Applicants commitment at the hearing to reduce the height of the infrastructure and finished ground levels, further details of which will be provided at Deadline 3.</p> <p>We also welcome the provision of an Outline Onshore Substation Design Principles Statement. The Council would however like to see the following additions to the document which would better reflect some of the Applicants commitments in other documents submitted:</p> <ul style="list-style-type: none"> <li>• A commitment that every reasonable effort will be made to reduce the footprint and height of the infrastructure at</li> </ul>	<p>Project Update Note (ExA.A.S-4.D2.V1) (REP2-007)</p> <p>ESC and SCC LIR paragraph 14.5-14.12 (REP1-132)</p>

	<p>the detailed design stage post consent to reflect commitment in Design and Access Statement (DAS).</p> <ul style="list-style-type: none"> <li>• Inclusion of the current modelled finished ground levels and a commitment to ‘achieving the lowest practicable finished ground levels to minimise visual impact’. This would reflect the Applicants comments made in response to the first round of questions from the Examining Authority.</li> <li>• Provision of an outline of the post-consent engagement process proposed with the local community to provide greater clarity and transparency.</li> </ul> <p>National Grid Infrastructure</p> <p>We note the National Grid substation has been designed to accommodate EA1N and EA2 even though National Grid has provided connection offers for Nautilus, Eurolink and Five Estuaries to connect at this location. The Council consider that as the National Grid substation is being considered as a strategic connection hub its design should reflect its intended purpose. We however understand that this is not the design which is in front of the Examining Authority and therefore our following comments will relate to the current design.</p> <p>We note the Applicants’ assertion that AIS is the worst case scenario and has therefore been assessed in the Environmental Statements. We have not seen any comparative assessments, with the exception of the photomontages, to show that AIS is the worst case in terms of all its environmental impacts. The Council would like to see the GIS option fully assessed to understand the</p>	<p>Design and Access Statement paragraphs 33-34 (APP-580)</p> <p>Applicants response to ExQ1 1.0.21 (REP1-105)</p>
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	<p>full implications of choosing one option over the other, notwithstanding the apparent footprint reduction offered by the GIS option.</p> <p>We note that the Applicants have been able to achieve footprint reductions following engagement with their supply chain, we therefore invite National Grid to see if they can achieve similar reductions.</p> <p>The Council also considers that permitted development rights should be removed so that any further expansion of the National Grid substation is subject to an appropriate degree of scrutiny.</p> <p>The Councils welcome the provision of the Outline National Grid Design Principles Statement by the Applicants at Deadline 1, we would also like some additional points to be covered in the document which are as follows:</p> <ul style="list-style-type: none"> <li>• A commitment that every reasonable effort will be made to reduce the footprint and height of the infrastructure at the detailed design stage post consent.</li> <li>• Inclusion of the current modelled finished ground levels and a commitment to ‘the presumption of achieving the lowest practicable finished ground levels to minimize visual impact’.</li> <li>• Design principles to commit to being applicable to the sealing end compounds and amendment to Requirement 12(6) to secure agreement of the details for sealing end compounds prior to their installation. The detailed siting and details of the sealing end compounds can then be reviewed post-consent to reduce their impacts if possible.</li> </ul>	<p>Outline National Grid Design Principles Statement (REP1-046)</p>
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	<p>The DAS (paragraph 69) identifies that the final location of the cable sealing end compounds will be identified post consent and factors such as properties and planting in addition to the overhead line realignment will influence the decision. ESC would therefore like this to be part of the post-consent considerations subject of Requirement 12(6).</p> <ul style="list-style-type: none"> <li>• Provision of an outline of the post-consent engagement process proposed with the local community.</li> </ul> <p>Noise</p> <p>The Council see the operational noise output from the substation as a key part of the design. We understand that this matter will be considered separately at a later hearing, but we feel it is important to highlight that the design of the substation should consider this factor and the layout and noise mitigation measures be carefully considered during the design refinement process in order to minimise the operational noise output. The design should consider:</p> <ul style="list-style-type: none"> <li>• locations of noise sources within the site</li> <li>• ranking the noise sources with the site</li> <li>• consideration of best available technology to minimise noise emission</li> <li>• options/technical measures for mitigating noise sources prioritising highest ranked sources (i.e. loudest)</li> <li>• Consideration of site topography and therefore propagation of sound to receptor locations.</li> </ul>	<p>Design and Access Statement (APP-580, paragraph 69)</p> <p>ESC joint LIR Section 19 paragraph 19.35 (REP1-132)</p>
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	<p>ESC supports the involvement of a Design Champion.</p> <p><u>Landscape and Visual Impacts</u></p> <p>The Examining Authority asked ESC whether we agreed with the Applicants description of influences on the landscape character area of the substation site. In response ESC advised that we did not recognise that the A12 or any suburbanisation effects have any influence on the landscape character of the locality of the substations. It was advised that the substation locality had a specific character of its own.</p> <p>ESC provided comments on growth rates - ESC advised that whilst we accept that the Applicants growth rates could be achieved in very favourable circumstances, we are of the view that they are unlikely to be achievable because of the recent trend towards especially dry Spring and early Summer weather conditions. No rain fell in 2020 in the Friston area between the second week of March and the second week of June which would be critically harmful to newly planted trees and hedges. Despite the best landscape specification and management provision, there remains the risk of adverse weather conditions that are beyond the control of the Applicants and which could risk the effectiveness of the proposed mitigation.</p> <p>The Council did not make specific representations regarding the historic landscape character of the substation site during the hearing but our views were set out in the LIR and our Deadline 2 response.</p>	<p>ESC joint LIR paragraphs 15.22-15.26 (REP1-132)</p> <p>ESC joint LIR paragraphs 15.27-15.29 (REP1-132) and Deadline 2 response paragraphs 9.11-9.18 (REP2-029)</p>
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	<p>The Council also did not seek to repeat all the comments which we have provided in Section 15 of the LIR in relation to the landscape and visual impacts of the projects during the hearing. The comments in the LIR however remain relevant. The substations will have a significant adverse impact on the rural landscape character of the site north of Friston, and on the visual amenity of the locality. We have expressed concerns as to whether these impacts can be adequately mitigated by the proposed planting programme given the inherent difficulties in successfully establishing large scale tree planting in the locality, and its effectiveness over the duration of the project given the anticipated slow establishment of the trees. We have therefore been engaging with the Applicants to request a commitment to the following:</p> <ul style="list-style-type: none"> <li>• Adaptive aftercare/management of the substation planting</li> <li>• Commitment to the provision of strategic offsite planting</li> <li>• Details of the long term management of the site</li> </ul> <p><u>Historic Environment – Built Heritage</u></p> <p>The Council agrees with the conclusion reached on the magnitude of adverse impact on Little Moor Farm but does not fully agree with how the assessment reached this conclusion (particularly regarding the importance of the historic PRoW.) The Council disagrees with the assessment of the magnitude of adverse impact on the significance of High House Farm, Woodside Farm and the Church of St Mary.</p>	<p>ESC and SCC LIR Section 15 (REP1-132)</p>
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	<p>Little Moor Farm - The Council agrees with the Applicants' assessment of an adverse impact of medium magnitude, giving rise to an effect that would be of moderate significance in EIA terms.</p> <p>Little Moor Farm has functional and historic links with the surrounding agricultural landscape, which contribute to its significance as a historic farmhouse. The relationship between the listed building and its farmland setting will be fundamentally changed by the introduction of industrial development of the scale proposed. The loss of the historic connection to the village core (including the historic PRoW) and the industrialisation of the open agricultural landscape to the south of Little Moor Farm would severely diminish the contribution that setting makes to its significance.</p> <p>High House Farm - The Council disagrees with the Applicants' assessment of an adverse impact of low magnitude, giving rise to an effect that would be of minor significance. We consider that the magnitude of adverse impact would be medium, giving rise to an effect of moderate significance.</p> <p>The impact of the proposed development on High House Farm would be similar to that on Little Moor Farm. The listed building has functional and historic connections with the surrounding open farmland, which enhance the rural character of its setting and allow for views across the fields to the village. The introduction of the large-scale industrial development within its setting would have a detrimental impact on the contribution that setting makes to the significance of High House Farm.</p>	<p>As identified in the Applicant's ES Appendix 24.7 (APP-519 &amp; APP-520).</p>
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	<p>Woodside Farm - The Council disagrees with the Applicants' assessment that if only EA2 were to be constructed, the adverse impact would be of low magnitude, giving rise to an effect that would be of minor significance. We consider that regardless of whether only EA1N, only EA2 or both substations were to be built, the magnitude of adverse impact would be medium, giving rise to an effect of moderate significance.</p> <p>The agricultural character and openness of the site make an important contribution to the setting of Woodside Farm, as this setting supports the understanding of the building as a historic farmhouse with functional and physical connections to the surrounding farmland and allows views across the landscape. Any scheme which includes EA1N or EA2, individually or together, would interrupt the open agricultural setting of the listed building, and importantly, the National Grid Substation would also still be built.</p> <p>Church of St Mary - The Council disagrees with the Applicants' assessment of an adverse impact of low magnitude, giving rise to an effect that would be of minor significance. We consider that the magnitude of adverse impact would be medium, giving rise to an effect of major significance.</p> <p>The openness of the landscape heightens the building's prominence in the landscape and enhances the rural character of its wider setting, both important aspects which contribute to its significance. Additionally, the key view of the church from the PRoW, that is thought to have been in existence in some form</p>	
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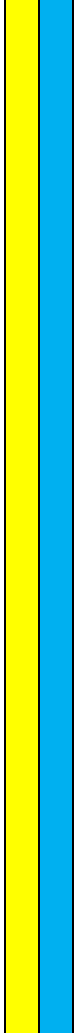




	<p>since the 10th century, would be obstructed by the development. The view from the historic common land at Friston Moor back towards the village core is a vital one in being able to understand how the settlement developed. The church tower is an important landmark and is key to connecting the dispersed parts of the village back to the core. The proposed large-scale industrial development would interrupt these views and the relationship between the church and the historic properties to the north, and would severely diminish the open rural character of its wider setting.</p> <p>The Council agrees with the Applicants' assessment of the impact on Friston House, Friston War Memorial and Friston Mill. The significance of the effect on these assets would be minor in EIA terms.</p> <p>Mitigation - The Council considers that the Outline Landscape Mitigation Plan (OLMP) would not mitigate the harm caused by locating the substations in the setting of Little Moor Farm, High House Farm, Woodside Farm and the church.</p> <p>The proposed large areas of woodland have no historic precedent and merely have the effect of providing a barrier between these heritage assets and their historically open, agricultural setting.</p> <p>The OLMP would not mitigate the loss of views from the north or the intrusion into the relationship between the church and the dispersed settlement around Friston Moor. While the proposed woodland would partially screen the industrial development, it</p>	
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		<p>would in itself be a barrier which obstructs the church's historically open, rural setting.</p> <p>The significance of the effect to Little Moor Farm, High House Farm, Woodside Farm and the church should be considered to be moderate to the farmhouses and major to the church in EIA terms even after mitigation.</p> <p>We are in continued discussions with the Applicants on measures to compensate this harm.</p> <p>The Examining Authority asked ESC whether we considered that the Applicants' proposals for further funded research on the historic of Friston and utilisation of such findings for local history talks, booklets and interpretation panels in combination with any planting could mitigate for the loss of the public right of way to the north of the church. ESC confirmed that these measures are seen as compensatory but do not comprise mitigation as they would not undo the harm/loss that the schemes would cause.</p>	
<p>The above discussions will include but not be limited to the following issues: evaluation of the proposed cable alignments and effect on relevant interests, including in relation to corridor widths; preferred substation layouts and their impact on mitigation measures; evaluation of cooling technologies and other effects in relation to the proposed substations</p>			

<p>and how these affect design; how 'good design' including design excellence and sustainability in respect of the projects as a whole and the substations in particular will be addressed, implemented and monitored; effect on the setting and significance of heritage assets and the relevance of any mitigation; the effect on any designated PRoWs and; the effectiveness of proposed mitigation measures and whether further mitigation can be implemented with regard to (but not limited to) – visual effects, environmental effects, public rights of way, the setting of heritage assets. The discussions will consider relevant policy and the tests therein.</p> <p>Following on from Agenda Item 2, the ExA may wish to draw upon any issues that have arisen during the ISH to also examine any cumulative impacts, including timetables for development and the potential for overlap and possible wider impacts arising from the proposed substations and grid connection site. The ExAs will invite submissions from invited IPs and Other Persons who wish to raise matters in</p>			
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<p>relation to this item. The Applicants will each be provided with a right of reply.</p> <p>This item will draw on responses to the ExA’s First Written Questions [PD-018], including but not limited to 1.0.1 to 1.0.16, 1.0.21, 1.8.1 to 1.8.14, 1.10.1 to 1.10.6, 1.10.8 to 1.10.16, 1.10.18, 1.10.22, and 1.10.25 to 1.10.26</p>			
<p><b>Agenda Item 5 – Possible Scope for Changes to the DCO Applications</b></p>			
<p>The ExAs will review the matters emerging from Agenda Items 2 to 4 above and will ask whether there is any possible need for changes to the DCO Applications before them to accommodate any of these. If there are, the possible scope, timing and process applicable to any such changes will be explored.</p> <p>The ExAs will ask for the Applicants’ submissions.</p> <p>The ExAs will invite submissions from invited IPs and Other Persons who wish to raise matters in relation to this item.</p>		<p>This agenda item was not discussed during the hearing, but ESC has provided comments below.</p> <p>The changes recommended to the draft DCOs have been outlined in relation to previous questions and set out in the Council’s LIR (REP1-132).</p> <ul style="list-style-type: none"> <li>• Updates to the Outline Onshore Substation Design Principles Statement.</li> <li>• Update to the Outline National Grid Design Principles Statement.</li> <li>• Update to Require 12(6) to include requirement for sealing end compound siting and layout to be approved.</li> <li>• Update to OCoCP to include consideration of special mitigation measures due to proximity of construction works to specific sensitive locations.</li> </ul>	

<p>The Applicants will each be provided with a right of reply.</p>		<ul style="list-style-type: none"> <li>• Re-design of National Grid substation to reflect its intended purpose or at a minimum update to CIAs to include implications of future connection infrastructure.</li> <li>• Full consideration of GIS technology.</li> <li>• Provision of further work on historic landscape character.</li> <li>• Provision of further work in relation to noise mitigation. incorporation of noise mitigation into the design of the substations.</li> <li>• Submission of update visualisations illustrating a more realistic depiction of 15 years of planting growth.</li> <li>• Commitment to use adaptive maintenance and aftercare in relation to the substation planting and replacement woodland (work no.24), and 10 year maintenance period for replacement woodland planting not 5 years as currently proposed.</li> <li>• Commitment to the provision of strategic offsite planting and a fund to provide private planting.</li> <li>• Submission of how the substation site and replacement woodland (work no.24) will be managed in the long term.</li> <li>• Commitment to provide a community liaison group to provide long term engagement with the community.</li> <li>• Commitment to the provision of strategic offsite planting and a fund to provide private planting.</li> <li>• Commitment to provide compensation for the residual impacts on heritage assets.</li> </ul>	
<p><b>Agenda Item 6 – Any Other Business Relevant to the Agenda</b></p>			

<p>The ExAs may raise any other minor and consequential topics bearing on the project descriptions and options as is expedient, having regard to the readiness of the persons present to address such matters.</p> <p>The ExAs may extend an opportunity for the Applicants, IPs and Other Persons to raise matters relevant to the project descriptions and options that they consider should be examined by the ExAs.</p> <p>If necessary, the Applicants will each be provided with a right of reply.</p>			
<p><b>Agenda Item 7 - Procedural Decisions, Review of Actions and Next Steps</b></p>			
<p>The ExAs will review whether there is any need for procedural decisions about additional information or any other matter arising from Agenda items 2 – 4.</p> <p>Submissions will be sought from the Applicants and any relevant IPs or Other Persons before determining whether decisions may be required, what they might address and whether timescales for performance are required.</p>			

<p>If the ExAs determine to make any procedural decisions, they may make these decisions orally (subject to confirmation in writing) or may reserve their decisions to be made in writing after the closure of the hearings.</p>	<p></p>	<p></p>	<p></p>
<p></p>	<p></p>	<p></p>	<p></p>
<p><b>Agenda Item 9 - Close of the hearings</b></p>	<p></p>	<p></p>	<p></p>
<p></p>	<p></p>	<p></p>	<p></p>

**Post Hearing Action from ISH2 - List of projects for consideration in cumulative impact assessment**

*IPs contributing to Agenda Items 2 (a) to (d) and making reference to specific projects that should be considered are requested to include a summary project table in their post-hearing written submissions. If there are no changes to the listed projects from previous written submissions, then the table should record – ‘no change’. If new projects are proposed as relevant that have not previously been raised, then the table should record – ‘change – new project’ and provide a summary reason for the inclusion.*

<p><b>Projects to be included in Cumulative Impact Assessment</b></p>	<p></p>
<p>Five Estuaries OWF</p>	<p>Should be included - No change</p>
<p>Nautilus Interconnector</p>	<p>Should be included - No change</p>
<p>Eurolink Interconnector</p>	<p>Should be included - No change</p>
<p>North Falls OWF</p>	<p>Should be included if connection offer confirmed - No change</p>

**Appendix A – Letters ESC has sent to Government regarding the lack of coordination in relation to energy projects and cumulative impacts.**



Rt Hon Greg Clark MP  
Department for Business, Energy and  
Industrial Strategy

Rt Hon James Brokenshire MP  
Department for Housing, Communities and  
Local Government

Dear Secretaries of State

**Local authority concerns regarding the cumulative impacts of Nationally Significant Energy Development on the Suffolk Coast -Offshore wind energy and international interconnector proposals making landfall and grid connection at Sizewell in Suffolk and the development of Sizewell C new nuclear power station**

**Overview**

The east Suffolk Coast, in the vicinity of Sizewell, in the Suffolk Coastal DC area, is soon to be inundated with further major energy infrastructure projects which will provide in the region of 25% of the UK's electricity requirement. In addition to the existing Sizewell A and B nuclear power stations and sub-stations for the Galloper and Greater Gabbard offshore wind farms, the area is now expecting the Sizewell C nuclear power station plus two sub-stations for Scottish Power Renewables East Anglia Offshore 2 and 1 (North) schemes; two inter-continental connector converter stations for National Grid Ventures and a single major National Grid Transmission sub-station connecting these to the pylon lines.

The location of these developments, set out below, is set within a highly sensitive landscape, being within the Suffolk Coast and Heaths AONB and Heritage Coast. The area is also poorly served by transport infrastructure, and given the significant scale of these projects there are serious reservations with regard to how the construction of all these developments, in combination, can be delivered without further exacerbating adverse impacts on the locality and reducing the attractiveness of the area to residents and visitors alike. The points below relate to the Scottish Power Renewables and National Grid proposals, though this needs to be considered in the context of Sizewell C coming forward at the same time.

Whilst we are supportive of Government policy on the transition to renewable energy and the requirement to maintain security of supply, this letter sets out the strong concerns that Waveney District Council, Suffolk Coastal District Council and Suffolk County Council (the Councils) have about the impact of the current and future set of proposals in the Sizewell and describes an initial four practical measures that the Government could take to ensure the impacts are properly assessed and mitigated. It asks for the opportunity to meet with Ministers to explain this further.

The area also has its socio-economic challenges so these developments are seen very much as game changers, as part of a wider package of economic development investments in the area that we want to embrace and support whilst acknowledging that to do this comprehensively, for the future benefit of the area needs the support of Government to help get it right. Suffolk County Council and Suffolk Coastal and Waveney District Councils (The Councils) support and embrace the principle of low carbon energy generation and the trading of energy across a European wide transmission network and want to help them be delivered if the local dividend is for the benefit of the whole area. Therefore the Councils are committed to working together to ensure that where such schemes are brought forward they will have a positive impact on Suffolk, and East Suffolk in particular; supporting significant local growth by delivering:

- substantial economic benefits;
- significant and sustained training and skills opportunities; and
- substantial community benefits.

The Councils are also committed to driving forward substantial housing expansion and other infrastructure development in the vicinity, including the A12 Suffolk Energy Gateway, flood protection scheme at Lowestoft, the expansion of the Port of Felixstowe and the development of new river Crossings in Ipswich and Lowestoft, as well as the development of the Ipswich Northern by-pass. This letter is the first stage in a hopefully productive relationship between Government and the Councils to facilitate wider investment and infrastructure improvements in Suffolk, in particular, East Suffolk.

The Councils consider that Sizewell C is of the highest importance to Suffolk and that it offers significant local employment and skills opportunities, as well as long term economic benefits associated with 900 full time positions in the District and associated annual spend in the local economy. The Councils consider that, subject to comprehensive mitigation as well as compensatory and other packages, these benefits may balance the significant environmental, social and public amenity impacts arising from the construction and operation of Sizewell C.

The Councils note that, in addition to the extensive offshore elements of the wind projects proposed by Scottish Power Renewables (SPR), the combined onshore footprint of the offshore wind and interconnector projects, (based on preliminary discussions between Suffolk Coastal District Council (SCDC) and National Grid Ventures), is of approximately the same order as that of the Sizewell A and B stations combined.

There are four key areas where we are looking for Government to intervene at this time:

1. The proposed Scottish Power Renewables sub-stations and National Grid Transmission sub-station are intended to be treated as Nationally Significant Infrastructure Projects to be dealt with through the Development Consent Order process and will eventually be the subject of decision making by the Secretary of State for Business, Energy and Industrial Strategy. National Grid Ventures by contrast proposes that their schemes should be the subject of Town and Country Planning Act processes and decided by the District Council as local planning authority with recourse, if necessary, to the Secretary of State for Housing, Communities and Local Government. It is our view that the schemes need to be considered as a whole, in particular as the location of the first proposals to seek approval will inevitably influence the location of subsequent schemes. This will be challenging with different consenting regimes, particularly given the sensitivities of this location and the

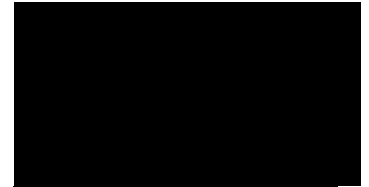
environmental designations therein. We ask that the Government ensures that the National Grid Ventures schemes are treated as Nationally Significant Infrastructure Projects in this instance so that all of the impacts of construction and operation can be considered in the round.

2. As we understand it, consideration of the various schemes by the same regime will not of itself ensure that the in-combination impacts can be assessed before in principle decisions on location are made. The current guidance used by the Planning Inspectorate appears to be that the first of the schemes to come forward will not be able to assess the cumulative impact of schemes that will follow. However, the location of the National Grid Transmission sub-station, which will come as part of the first application, will inevitably draw subsequent development to the same broad vicinity. Yet the longer term consequences of the first decision will not be capable of being assessed when looking at its implications. The ask here is that Government should ensure that there should be recognition of the cumulative consequences of the precedent being laid down by the first decision.
3. In the view of the Councils, the most advantageous site for the location of the sub-stations and convertor stations has not been capable of being included for consideration by Scottish Power Renewables because it is owned by EDF Energy (see map appended). Although within the Area of Outstanding Natural Beauty, the landform, the existing landscaping and the relationship with the existing built structures at Sizewell A and B mean that it will be able to accommodate the scale of development required much better than any of the locations suggested by Scottish Power Renewables. Although not part of the operational land required for Sizewell B or a future Sizewell C, EDF Energy is unwilling to lose the land as they state that it is to be used for environmental mitigation of the construction of the new Sizewell C. In the view of the Councils, there is other land capable of meeting these purposes in the vicinity but which cannot so readily accommodate the substantial structures being proposed for the new energy projects. The ask of Government here is that pressure is brought to bear on EDF Energy to treat with Scottish Power Renewables to bring this land into the assessment process.
4. While other schemes in the area, notably Sizewell nuclear power station, have an on-going benefit to the area due to the additional economic activity they can bring, the Scottish Power Renewables and National Grid sub-stations and convertor stations will continue to blight the area for many years wherever they are located, yet will bring no benefit to the immediate area. The construction, care and maintenance of the offshore windfarms will have benefit in some of our ports, 30 miles or more away, but the inter-connectors will have no employment attributed to them once construction is complete. The communities need to see some sort of compensation for the impact on their areas, but it is not clear how this would come forward. We would ask the Government to support the local authorities, both in terms of encouraging the developers to compensate local communities for their impact on the environment and communities and in responding to the strategy proposed for the wider growth of East Suffolk, of which the energy projects are a part (set out in more detail later on in this letter).

We recognise the importance of the Government's energy strategy and the move towards more renewable forms of generation but would ask that we meet you in the near future so that we can

explain these issues described above in more detail and explore how Government may assist in ameliorating what appears likely be very considerable impacts on our area which is having to bear the significant growth of renewable energy. This letter has also been signed by the Leader of Waveney District Council as by the time that examination of any of the schemes, Waveney and Suffolk Coastal Districts will have been merged into East Suffolk District and there are wider implications for the whole of East Suffolk with all of these projects converging in this sensitive landscape.

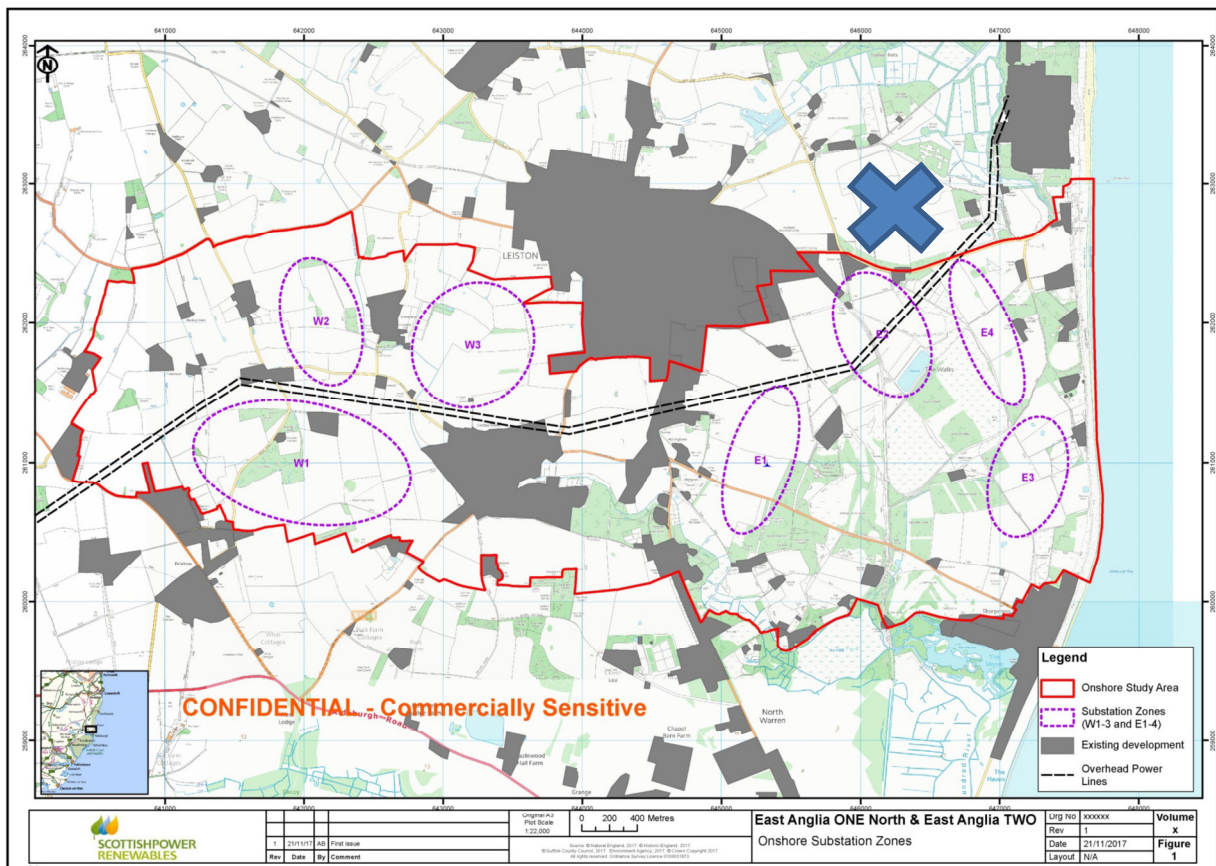
Yours sincerely



**Cllr Ray Herring**  
 Leader  
 Suffolk Coastal District Council

**Cllr Mark Bee**  
 Leader  
 Waveney District Council

**Cllr Colin Noble**  
 Leader  
 Suffolk County Council



The Councils preferred location for onshore equipment

## **Further detailed information:**

### **Introduction**

The purpose of this letter is to highlight the following key strategic issues based on the work and discussions with the various projects that has been carried out to date, relating to:

- a) The proximity of the Sizewell C new nuclear, Scottish Power Renewables offshore wind farms and National Grid Ventures intercontinental connector projects;
- b) The overlapping construction periods of the Sizewell C, Scottish Power Renewables, and National Grid Ventures projects;
- c) The cumulative and sequential environmental, public amenity, socio-economic and infrastructure impacts of the construction and operation of these projects; and
- d) The variation in consenting regimes between these projects.
- e) The wider economic growth of the east Suffolk area and the linkages with these projects.

It is important to recognise that there will be other localised / detailed issues arising from the construction of the onshore infrastructure needed to support the proposed offshore wind farms and inter-continental connectors. Such detailed issues will continue to be addressed by all the Councils in their statutory role as local planning authorities; and the County Council as statutory highway authority, lead local flood, and the minerals and waste planning authority.

### **Background**

**The proposals** - There are currently two Nationally Significant Infrastructure Projects (NSIPs) for offshore wind farms and one for a twin reactor Nuclear Power Station which will be going through the Development Consent Order (DCO) process in Suffolk and are currently at pre-application stage:

- East Anglia TWO (SPR)
- East Anglia ONE North (SPR)
- Sizewell C (EDF Energy)

These proposals will be determined by the Secretary of State for Business, Energy and Industrial Strategy as they are defined as a Nationally Significant Infrastructure Projects (NSIP) under the Planning Act 2008.

In addition there are two projects for International interconnectors the Councils have been made aware of via National Grid's TEC register: the offer for two inter-continental connectors – Eurolink and Nautilus to be connected to the National Grid at Sizewell.

The onshore elements of these proposals will be determined under the Town and Country Planning Act (TCPA) 1990 by Suffolk Coastal District Council as local planning authority, yet onshore, are of a similar if not more significant scale as the onshore elements of the offshore wind proposals. These proposals are not within the District's current Local Plan and should they be approached negatively, have the potential to be determined through the existing planning appeal process which is determined by the Secretary of State for Housing, Communities and Local Government. The difference in consenting regimes for the various projects has the potential to lead to risk for the promoters / developers of these various projects.

## **Action required –**

Having reviewed the proposals and considered the benefits and dis-benefits of each of the projects proposed, it is considered that in order to optimally address the proposals singularly and cumulatively, all of the projects should be considered as Nationally Significant Infrastructure Projects under the Planning Act 2008. The interconnector projects by virtue of their international significance in maintaining security of energy in the UK and abroad and having regard to the sensitive landscape and cumulative impacts of the two National Grid Ventures projects with the new nuclear proposal and offshore wind farms necessitate and justify consideration of all of these significant energy projects under a single regime – namely the NSIP process under the Secretary of State for Business, Energy and Industrial Strategy.

## **Regionally**

In addition, our colleagues in Norfolk are facing their own challenges with multiple offshore wind energy proposals making landfall and grid connection in Norfolk. To the south, Bradwell in Essex is proposed for a new nuclear power station; cumulatively East Anglia is proposed to be responsible for these numerous new grid connections providing for the next generation of low carbon energy supply for the UK as a whole. It has been calculated and estimated that East Suffolk alone will be responsible for approximately 30% of the UK's power generating supply to the National Grid once these projects come on line ( to include connections at Sizewell and Bawdsey).

**National Policy** – at a national level the key energy objectives are:

- Reducing greenhouse gases (carbon reduction);
- Providing energy security; and
- Maximising economic objectives.

In order to meet these objectives more energy infrastructure is required with an increased emphasis on energy generation from renewable and low carbon sources.

The Government is committed to the following targets by 2030:

- A 40% cut in greenhouse gas emissions compared to 1990 levels;
- At least a 27% share of renewable energy consumption; and
- At least 27% improvement in energy efficiency.

It is understood that the proposals for new nuclear and offshore wind farms are recognised as being broadly consistent with national targets and objectives on renewable energy and climate change. In addition, the proposals for inter-continental connectors support the key energy objective of providing energy security by enabling energy exchange with international partners, in this instance Belgium and the Netherlands.

## **Grid Connection and Electricity Supply Issues**

**Collaboration** – there have been ongoing meetings between EDF Energy and the Councils, between SPR and the Councils and at Suffolk Coastal District Councils behest between EDF Energy, SPR, National Grid Ventures and National Grid in order to understand, discuss and potentially address the cumulative impacts to East Suffolk of hosting the numerous energy projects proposed. In addition, the East Suffolk authorities with the County Council have been meeting with

Essex County Council and Maldon District Council (Bradwell) to discuss potential synergies between new nuclear projects and opportunities for collaboration, knowledge sharing and potentially resource combining.

Given the significant infrastructure required onshore to facilitate these primarily offshore projects (not the nuclear) consideration should be given to an offshore hub hosting the onshore substation requirements for all of the projects thus eliminating the massive intrusion into the rural landscape resulting from the individual projects.

### **Action required –**

Any energy promotor / developer making landfall and grid connection in East Suffolk must work together and with the Councils to address the cumulative impacts whether beneficial or detrimental to the host communities.

Consideration should also be given to investing in an offshore hub to host necessary substation requirements and to avoid adverse significant impact on the rural environment of East Suffolk.

### **Socio-economic issues**

There are potentially significant economic benefits arising from the new nuclear proposal at Sizewell, however, there have not been significant economic benefits arising from the offshore wind farms that have been identified to date.

Suffolk and East Suffolk is seeking:

- High quality jobs;
- Supply chain opportunities; and
- Longer term jobs – operations and maintenance.

Proposals at Sizewell C new nuclear power station will provide for 900 operational jobs located at Sizewell, there will be annual sums of millions of pounds into the local economy resulting from Sizewell C. The onshore wind farm infrastructure and onshore interconnector infrastructure do not appear to provide for any operational jobs in the local area with the main benefit being in the operations and maintenance of the wind turbines offshore. Some of this is being provided by the Port of Lowestoft and it is good to note the increased activity and jobs growth in this town which is in need of investment. However there is an unacceptable impact on the communities hosting the new infrastructure that is unlikely to be mitigated and will therefore require significant compensation.

In addition to seeking economic benefits, there must be an opportunity for the Energy Companies to work with schools, colleges and the Councils to develop a Skills Strategy aimed at creating:

- Local apprenticeships and training initiatives;
- Work experience opportunities;
- Internship opportunities; and
- Significant upskilling opportunities.

The Councils are already working closely and collaboratively with EDF Energy in this area and would welcome further investment and input from Government and the Energy Companies.

### **Action required –**

Joint working with Government, Energy Companies and Council to develop and invest in a skills strategy which will benefit the local community and provide schools and colleges with the means to teach the new skills required to facilitate the energy projects.

### **Community Issues**

Sizewell and its surrounding areas are proposed to be massively impacted by up to five energy projects over the next 10 – 15 years, including a new nuclear power station, landfall and onshore infrastructure associated with two offshore wind farms and landfall and infrastructure associated with two intercontinental connectors. All significant development and only the new nuclear proposal will result in permanent jobs in the locality and an ongoing supply chain opportunity.

The impact on these communities will need to be assessed, mitigated and compensated for by the Energy Companies and by Government. This also needs to be considered against the wider growth opportunities that are being brought forward in East Suffolk.

### **Action required –**

The Energy Companies within their individual Environment Statements should provide supporting documentation on how the impacts of the onshore construction of their proposals on local communities can be satisfactorily mitigated. Any disruption caused by a cable route and the laying of cables must be kept to a minimum.

Where appropriate construction timetables between the projects should be aligned, development footprints minimised and where appropriate facilities shared such as compounds, highway routes, haul routes etc. in order to minimise adverse impacts on the local community and businesses.

In-combination effects of all projects regardless of what stage in the process they are must be considered. It is unacceptable for certain projects not to be assessed because they have yet to be formally embarked upon given the potential cumulative impacts of these large scale projects.

An appropriate compensation package is to be identified by each individual project to mitigate their own individual adverse impacts on the local community – residents and businesses, in addition a cumulative package needs to be assessed addressing and acknowledging the adverse cumulative impacts of the five projects on this part of East Suffolk and finally a Government led package of mitigation and compensation to the hosting community in recognition of their sacrifice and adverse impact resulting from their significant contribution to maintaining the UK's energy supply.

### **Environment**

The coast at Sizewell is at the narrowest point of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, a national designation, of which East Suffolk is proud and protective. In addition, there are a suite of landscape and ecological designations on this part of the Suffolk coast, both onshore and offshore that have the potential to suffer adverse harm from these projects, in addition to the expected impacts of the construction and operation of Sizewell C.

This area currently hosts the decommissioning Sizewell A Magnox nuclear power station, the Sizewell B EDF Energy operating nuclear power station, the Greater Gabbard offshore wind farm onshore substation, the Galloper offshore wind farm, onshore substation and is proposed to host



the new nuclear power station Sizewell C. This is a significant section of the AONB hosting industrial and large scale infrastructure on behalf of the country. It is considered by the Councils to currently be mitigated by significant planting in the vicinity. However, no amount of planting can successfully mask the nuclear power station buildings.

However, it is considered that co-locating the proposed onshore infrastructure to service the offshore windfarms and intercontinental interconnectors could have a significant benefit to the wider environment and community. This conclusion has been reluctantly reached having regard to the wider issues resulting from locating the infrastructure in the agricultural countryside with greater impact on residential populations. A benefit of co-locating adjacent to the existing energy infrastructure at Sizewell is the reduction in residential properties directly impacted by the proposals. A plan of the proposed location is attached to this letter. It is land currently owned by EDF Energy and proposed for ecological mitigation in the form of reptile habitat. However, there are alternative sites that this mitigation and compensation could be located on and therefore it is considered that the optimum use of this land for the community would be to co-locate the onshore infrastructure associated with the offshore developments in this location. The land is suitable to allow re-engineering in order to mitigate the overall height of the structures and there is adequate available land to provide mitigation in the form of planting. The new buildings will still be visible but it is considered that with two existing and one proposed nuclear power stations in the background that this would help to mitigate against the developments as proposed and would ensure that the industrialisation is kept within close vicinity of each other rather than affecting a wider landscape. There would need to be significant work undertaken to minimise the adverse impact on the AONB but overall it is suggested that this could be achieved and that on balance this location within the AONB would outweigh any other site in the wider countryside in the vicinity.

Further to the socio-economic benefits and dis-benefits associated with such developments, the cumulative and in-combination effects of the construction of these projects is of particular concern given the duration and extent of disturbance and disruption to, or severance of, habitats.

This may lead to the disruption, or permanent loss, of Priority Habitats both within and outside the designated areas, which support the resilience of designated sites and sensitive species, including European Protected Species.

The area has a high number of nationally designated archaeological sites and listed buildings, and sites of high archaeological significance and potential. Proposals will have a direct impact upon surviving below-ground archaeological remains and a setting / visual impact upon above-ground heritage assets.

#### **Action required –**

EDF Energy should be required as statutory provider of energy and landowner to consider alternative arrangements for ecological mitigation / compensation land, and to consider permitting the offshore energy providers to co-locate their onshore infrastructure on EDF Energy owned land adjacent to the existing energy infrastructure including their own existing nuclear power station and proposed station Sizewell C.

Further detailed work is to be carried out to assess in-combination and cumulative impacts of the development proposals on the environment as identified previously.

## **Wider Economic Growth and Infrastructure requirements**

East Suffolk is also embarking upon an ambitious growth programme to support the ambitions of the New Anglia LEP growth strategy and the wider support necessary to deliver much improved required transport and other infrastructure.

Embracing the development of the major energy investment helps to articulate the scale of the opportunity but that comes with some significant challenges in terms of coordinating and delivering the development in the right way for the investors but also for the host communities.

The East Suffolk Council's Local Plans will be aiming to deliver a minimum of 21000 homes by 2036, many of which are predicated on the jobs requirements of the energy businesses. In addition the east Suffolk area hosts the Port of Felixstowe which handles 44% of all container traffic imports into the UK. It needs to expand and update its facilities. This will also need improved transport connectivity along the A14/A12 and east rail. The energy developments will also have to utilise these routes for access for their construction vehicles. The offshore wind, as mentioned earlier, is having a positive impact on the regeneration of Lowestoft. Lowestoft is seeing investment in its port and related business but also CEFAS are redeveloping their premises with a £20m new development that will allow it to grow as well as develop incubator businesses too.

### **Action Required -**

Whilst the above summary only really scratches the surface of the economic opportunities that the three councils are looking to deliver it is hoped it provides an indication of our ambition but also the challenges we face. It is in all our interests to facilitate these developments but it is requiring a planned coordinated approach with appropriate interventions as necessary to ensure that the sequencing of development and delivery of mitigation and compensations is properly and fully considered.

### **Summary**

In summary, the Councils want to support the energy infrastructure proposed in East Suffolk but to date have not been given the confidence that to do so would not result in unacceptable harm to the local environment and the existing communities.

The potential for economic benefits in relation to the offshore proposals have to date not been demonstrated as being significant enough to outweigh the disruption and longer term adverse impact on the local environment and communities. There has been to date inadequate demonstration by Energy Companies that their proposals would be adequately mitigated and there has been no discussion to date on compensation for the residual harm which will arrive from all of the Energy Projects proposed, on the communities, residents, businesses, environment and in particular the designated landscape and coastline.

The Councils want to be able to support such proposals in the vicinity of Sizewell, but to do so, need to be convinced that such developments can be appropriately accommodated in a suitable location and that adequate mitigation and compensation will be forthcoming in particular for the local communities.

We welcome the opportunity to work closely with Government and the promoters and developers in relation to this sensitive and significant matter and would welcome a meeting at your earliest convenience.

This letter will be copied to:

1. Stephen Speed, Director, Civil Nuclear and Resilience Directorate, BEIS
2. Simon Ridley, Director General, Decentralisation and Growth
3. National Grid
4. Planning Inspectorate
5. UK Power Networks
6. EDF Energy
7. Scottish Power Renewables
8. National Grid Ventures
9. Dr Daniel Poulter MP Central Suffolk and North Ipswich
10. Peter Aldous MP Waveney
11. Dr Therese Coffey MP Suffolk Coastal



Your ref MC82018fi2226

Our ref

Date 30<sup>th</sup> July 2018

Please ask for Philip Ridley

Direct dial 01394 444432

Email philip.ridley@eastsuffolk.gov.uk

The Rt Hon Claire Perry MP  
Minister of State for Energy and Clean Growth  
Department for Business, Energy &  
Industrial Strategy  
1 Victoria Street  
London  
SW1H OET

Dear Ms Perry

**RE: Energy Projects proposed on the Suffolk Coast in the vicinity of Sizewell.**

On behalf of myself, and Cllr Andrew Reid of Suffolk County Council, I would like to thank-you for meeting with us, Therese Coffey MP, and colleagues on 24<sup>th</sup> July to discuss the proposed energy projects coming forward in the sensitive area around Sizewell, in east Suffolk. These significant developments are proposed here so as to take advantage of available grid capacity at Sizewell. We are appreciative of your clear understanding of the scale of the impacts on our communities that we have to address whilst acknowledging these developments are necessary to enable us to have security of energy supply.

Our two councils do not wish to unnecessarily resist these proposals but need to ensure that if they are to take place that they are sensitive to the special qualities of this protected area. Your clear statement from you in our meeting that you expect the promoters to work together with us to minimise the cumulative effects of the proposals provides us with the comfort that there is support for us pursuing the strategy we want to take forward to get the best solution possible. The two councils will be writing to the promoters informing them that we met and referring, as you suggested, to your expectation that we all work together, along with the statutory bodies to resolve the understandable concerns.

We will also be writing to you shortly to formally request that you Direct, as provided for in s35 of the 2008 Act, that the National Grid Ventures proposals be accepted as Nationally Significant Infrastructure Projects. Your agreement to this will enable the cumulative impacts of all these proposals to be properly considered through the one consenting regime.

The next 10 years will see significant energy development in this area which will put added pressure on our infrastructure, especially roads and rail access which will face unparalleled increases in capacity using them. Timely delivery of the required mitigation is critical as we have highlighted to you. There are, despite all these challenges, significant opportunities we want to embrace, to maximise the local benefit. Your support, and that of your colleagues and officials is important to us and we look forward to continue to work with you in the future to get the right outcome. Our two councils would also be pleased to host a visit from you to see for yourself the scale of the challenge, and the opportunity, and look forward to hearing from you shortly.

Yours sincerely



Cllr Geoff Holdcroft  
Deputy Leader & Cabinet Member for Cabinet Member for Economic Development  
Suffolk Coastal District Council

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**Suffolk Coastal District Council**

East Suffolk House, Riduna Park, Station Road, Melton, Woodbridge, IP12 1RT  
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Date: 29 November 2018  
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Rt Hon Greg Clark MP

Department for Business, Energy and Industrial Strategy

Dear Secretary of State,

**Local authority concerns regarding the cumulative impacts of Nationally Significant Energy Development on the Suffolk Coast – offshore wind energy and interconnector proposals making landfall and grid connection at Sizewell in Suffolk and the development of Sizewell C new nuclear power station**

A letter was sent to you and the Rt Hon James Brokenshire MP on the 11 May 2018 highlighting local authority concerns with the number and scale of major energy infrastructure projects proposed for the Sizewell area on the East Suffolk coast.

Since that letter, we have had a number of letter exchanges and a meeting with Claire Perry MP, Energy Minister, in your department which have been welcomed and thank you for aiding in the facilitation of this meeting.

Subsequent to May there have been two rounds of public consultation by Scottish Power Renewables (SPR) on their two offshore windfarm proposals (East Anglia 1 North and East Anglia 2) and clarity from EDF Energy that it will be conducting a Stage 3 public consultation in January 2019. The EDF Energy public consultation will be alongside SPR's round 4 public consultation. Indications are that we will be at DCO examination for the three projects simultaneously in late 2019 / early 2021. This has significant resource implications for all local authorities affected that is never fully compensated for by planning performance agreements.

We are also aware that there are two further proposals for interconnectors proposed by National Grid Ventures with connections offered in the Sizewell area and that Greater Gabbard and Galloper offshore windfarms are exploring opportunities for expansion. We do not know whether these extensions to existing offshore windfarms (which both have substations in the Sizewell area) will result in further onshore infrastructure requirements in our locality. There is also proposed a Round 4 lease auction from the Crown Estate, which could further impact on our locality.

It appears to the Local Authorities that the way that the energy market as currently constructed (by Government policy) does not allow anything but incremental change that precludes looking at, for instance, an offshore grid to connect together windfarms and capable of being brought ashore closer to key markets. We see many parties having some influence in this field (BEIS, Crown Estates, Ofgem, National Grid Strategy, National Grid Transmission, windfarm operating companies interconnector companies and OFTOs), but we do not see any formal co-ordination.

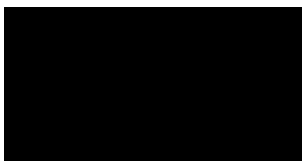
The difficulty is that we are, in effect, being asked to anticipate and judge the incremental impacts of a piecemeal and uncoordinated approach to the development of the offshore to onshore infrastructure with unknown and potentially far more significant cumulative impacts that will bring long-term detriment to the environment and communities of East Suffolk. The likelihood that any or all of these will be drawn to the same location as the SPR sub-stations may have a significant effect on the rural locality and possibly protected landscape.

In this context, we are seeking further discussions with you having regard to the following:

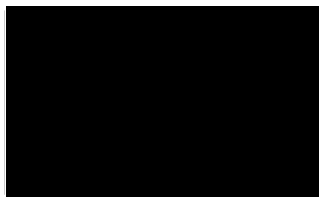
1. The communities in this part of Suffolk need to be compensated for the disruption and long term impact that they will have to suffer both in terms of the construction phase and then of the “industrialisation” of large areas of attractive, unspoilt open countryside or AONB. It should be noted that this is in the context of no significant economic benefit in the immediate area once the construction phase is over. Government led and funded community benefit has been proposed in relation to new nuclear proposals but there has been no policy basis for community benefit in relation to other nationally significant energy projects. Having regard to up to 25% of the UK’s electricity requirements being routed through the Sizewell area with very limited economic benefit for the residents, there needs to be discussions around a Government led and funded community benefit proposal for all major energy proposals.
2. There appears to be no overall consideration of longer terms strategies that will allow a more innovative approach to transferring energy from offshore to markets without the damaging consequences that we appear to have to suffer in Suffolk., it appears that no one is in a position to guide a future strategy for transmission. It should be the role of Government to lead on this matter.

A number of points have been highlighted and we are happy to discuss these further with you and your ministers.

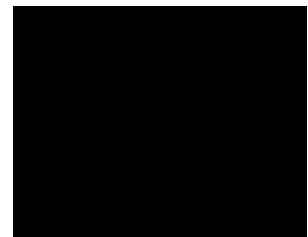
Yours sincerely



**Cllr Ray Herring**  
Leader  
Suffolk Coastal District Council



**Cllr Mark Bee**  
Leader  
Waveney District Council



**Cllr Matthew Hicks**  
Leader  
Suffolk County Council



Greg Clark MP  
Secretary of State for Business, Energy  
and Industrial Strategy  
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Date: 29 March 2019  
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Dear Rt Hon Greg Clark MP,

CC: Rt Hon James Brokenshire MP & Rt Hon Michael Gove MP

## **MEETING GOVERNMENT'S AMBITION FOR CLEAN GROWTH WHILST LEAVING THE ENVIRONMENT IN A BETTER STATE**

### **Executive summary**

We are grateful for the reply of 14 January 2019 that we received from The Rt Hon Claire Perry, Minister of State, to our letter to you dated 29th November 2018.

However, we are very disappointed that our principal concern regarding the uncoordinated and piecemeal approach to the development of energy projects was not fully addressed. This includes offshore wind generation and its associated onshore infrastructure, a new nuclear power station and interconnectors with Europe, together with the infrastructure required for onward transmission. We believe that this is a critical issue for your department, working in concert with DEFRA and MHCLG to ensure infrastructure is situated appropriately and the impacts on the environment and on communities are understood, minimised where possible and mitigated and compensated adequately. Accordingly, we have copied in James Brokenshire and Michael Gove.

Since we wrote to you in November last year, this question has emerged as one of the biggest issues raised in the current Sizewell C Stage III consultation and the consultations for East Anglia One North and East Anglia Two offshore wind farms. The community is making very clear in regard to its responses to both EDF Energy and Scottish Power Renewables that they are deeply concerned about this matter. We would like to convey to you that this is not merely a technical planning matter but, with possibly the exception of transport, is the single biggest matter that our constituents are bringing to us on these important developments.

We note that the letter of 14 January refers to the role of National Grid in coordinating the development of the Great Britain electricity transmission system and that of the Planning

Inspectorate in testing individual applications. However, in our view, these organisations are not in a position to be any more than reactive to individual schemes coming forward. There is a clear role for your Department to take a strong leadership role that would enable offshore wind projects to be coordinated alongside other energy infrastructure, including new nuclear and interconnectors, in a way that would reduce environmental impact and offer economies of scale which would be of benefit to the consumer.

There are a number of ways in which such leadership could be achieved but we would consider that a clearer spatial approach in a National Policy Statement could be an appropriate vehicle.

We want to reassure you that our local authorities strongly support Government's commitment to expanding the diversification of the energy sector as part of its drive towards a low-carbon economy. We welcome the investment in our local economy and communities as a result of these projects, and we will continue to work with developers and others towards this. However, this cannot be at any cost to the environment and to communities.

If all the proposed projects go ahead, Suffolk will be making a very significant contribution to hosting energy projects that will account for more than a quarter of the nation's electricity demand, if not close to a third. As local authorities responsible for this area, we wish to work with Government to help deliver this in the national interest whilst ensuring that the community benefits that flow from this are commensurate with their impact, strategic importance and financial value in the manner highlighted by your Minister in the adjournment debate on 11 March. We were pleased to see that discussion albeit focused on Norfolk but with the acknowledgement that very similar difficulties are occurring in Suffolk.

The councils have sought to raise the issues with all relevant government departments to highlight the need for joint working. Officers of Suffolk Coastal District Council have met with Simon Ridley (Director General, Decentralisation and Growth at MHCLG) who was accompanied by senior colleagues from BEIS, DfT and DEFRA to raise these concerns. As a result of this, on 18<sup>th</sup> March officers have had a useful conversation with Jenny Preece at MHCLG who has been tasked by Simon Ridley to review the issues and look to use the concerns being raised by our councils to develop learning to help ensure the significant issues being faced in East Suffolk can be properly and fully considered. We look forward to this being a positive engagement process and we will keep you informed of progress from our councils' perspective.

We have copied in the Secretaries of State for Housing, Communities and Local Government and Environment, Farming and Rural Affairs to this letter in light of the former's responsibility for the process by which Development Consent Orders are tested and the latter for the consequences on the 25 Year Environment Plan. However, it appears to us that the key responsibility in these matters relates to the work of your Department and we would welcome a further meeting to discuss this, ideally with the presence of the other departments.



## Background

Our concerns about the apparently uncoordinated approach to the development of individual energy schemes are manifested in two related themes. First, the way in which offshore windfarms are brought forward does not allow for any proper consideration of the cumulative consequences of a number of schemes, particularly their onshore elements. Secondly, it is difficult to consider the in-combination impacts of these onshore elements of offshore wind alongside a number of other technologies in specific locations, including the proposed nuclear power station, as a whole. The separation between offshore wind and the new nuclear process is clearly impacting upon East Suffolk.

We are pleased to see references in the recently launched Offshore Wind Sector Deal to the need for better coordination in delivery of development and associated infrastructure and in particular your recognition of the impacts on the environment and on residents, for example:

“The government will work collaboratively with the sector and wider stakeholders to address strategic deployment issues including aviation radar, onshore and offshore transmission, cumulative environmental impacts both in the marine and onshore areas...” (page 16, Industrial Strategy, Offshore Wind Sector Deal)

We welcome the recognition that issues on the ground are important and that Rt Hon Claire Perry raised this at the round table at Great Yarmouth for the launch of the Offshore Wind Sector Deal, and that it was referred to in the adjournment debate in the House on 11 March 2019.

We also welcome and support the commitment from The Crown Estate to work “in partnership with regulators, developers, operators, Statutory Nature Conservation Bodies, and non-governmental organisations...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.” (page 28, *ibid.*). It is essential that local authorities are fully engaged by The Crown Estate in this partnership.

Despite this we remain concerned about the consequences of no single overview by Government, nor National Grid, of the whole process of bringing additional capacity onstream.

It is also important to note that this reference to offshore wind schemes only covers a part of the pressures that Suffolk is facing through Nationally Significant Infrastructure Projects relating to energy. As you will know, the Suffolk coast is subject to proposals for a nuclear power station by EDF Energy, four phases of the East Anglia Offshore Wind project (by Scottish Power Renewables), two interconnectors to Belgium and the Netherlands by National Grid Ventures, possibly two further phases of the Galloper and Greater Gabbard windfarms, as well as Round 4 windfarms under consideration by The Crown Estate.

A number of agencies – your Department, Ofgem, The Crown Estate, National Grid Systems Operator, National Grid Electricity Transmission and individual developers and Offshore Transmission Owners - influence the way in which offshore windfarms connect to the onshore grid, but no one appears to take an overview to ensure the most efficient,

economic and environmentally responsible approach to delivering new offshore capacity and other key new energy infrastructure proposed in an area.

In our view, this approach leads to adverse impacts on the environment where landfall is made and on areas where substantial new buildings and infrastructure are required to establish the connections to the grid. These include an inability to have a long-term approach to an offshore grid, an inability to achieve efficiencies in cable routes, and inefficiency and confusion at Examination stage when several schemes are assessed independently, but at the same time.

If this approach continues, we believe it will:

- result in avoidable environmental damage;
- undermine Government's goal of leaving the environment in a better state than it found it;
- alienate local communities affected, creating greater resistance to future expansion;
- not result in the most optimal set of mitigation measures for construction and operation of the proposed energy projects; and
- miss the opportunity to achieve economies of scale in the transmission, ultimately resulting in higher costs to the consumer.

Natural capital and environmental net gain are core principles of Government's 25-year Environment Plan, but we believe the current approach to offshore wind energy, and more widely to in-combination effects of a range of energy infrastructure projects, fails to apply these by:

- preventing collaboration in the delivery of onshore and offshore infrastructure, resulting in a potentially greater loss of marine and terrestrial habitats and the species dependent on them and increasing future pressure on the most sensitive areas;
- undermining the use of sound mitigation measures, such as ducting for multiple cable routes, prolonging disturbance and environmental impacts from construction and delaying the restoration of habitats and landscapes affected;
- failing to ensure that strategic decisions are based upon a comprehensive understanding of the cumulative environmental effects of schemes, preventing developers of individual schemes from avoiding unsuitable onshore locations and having to pursue 'least-worst' options through highly sensitive and dynamic coastal environments; and
- preventing a long-term, coordinated approach to developing mitigation and, where necessary, compensation for the onshore impacts of these schemes, thereby not taking opportunities to secure long-term environmental net gain.

As an example of the possible consequences of this, we refer to the situation in Suffolk. With our low-lying, dynamic coastline and extensive inter-tidal areas we are only too aware in Suffolk of the current and projected impacts of climate change and the imperative to reduce carbon emissions from energy generation. That must not, however, be at the expense of our critical natural capital, including the nationally and internationally important landscapes and wildlife of the Suffolk coast, which underpin a local visitor economy worth more than £200 million a year. Similar, but locally specific tensions will be seen elsewhere in the country.

The National Overarching Policy Statement for Energy (EN-1) makes clear that any applicant should provide information in the Environmental Statement as to how their proposal would combine and interact with the effects of other development (including projects for which consent has been sought or granted, as well as those already in existence). It goes on to say that the Planning Inspectorate may also have other evidence before it, for example from appraisals of sustainability of relevant NPSs or development plans, on such effects and potential interactions. It then states that:

“The [Planning Inspectorate] should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.”

In our view the Inspectorate’s ability to apply this assessment at an individual scheme level is limited by the lack of a more strategic assessment having been carried out as to where and at what rate new offshore generating capacity should be developed, taking account of both offshore and onshore considerations, including network connections and capacity. Such an assessment would be analogous to that undertaken as part of the National Policy Statement for Nuclear Power Generation (EN-6). We suggest there would be considerable value in adopting a similar approach before progressing further phases of offshore wind development, particularly given the significant expansion in capacity that is envisaged by the industry and government by 2030.

This would ensure that Government could have greater confidence in meeting its ambition for offshore wind as part of a low-carbon economy, whilst also fulfilling its ambition to leave the environment in a better state than it found it.

Specifically, it would provide:

- A ‘pipeline’ of proposed developments to inform a more strategic plan for securing environmental gain and enable earlier interventions to secure this, thereby minimising the period of net loss during project/s delivery and operation;
- An overview of all prospective schemes impacting on coastal management cells to ensure the individual and in combination effects on natural coastal features and important sediment pathways can be better understood and factored into strategic decisions;

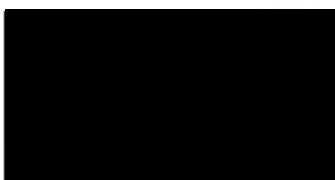
- More thorough assessments of impacts on wildlife at an early enough stage to avoid where possible, and if not ensure any mitigation and compensation required is more effective against in-combination effects; and
- Better protection for our most sensitive landscapes, such as Areas of Outstanding Natural Beauty (AONB), and their special qualities, in line with Government's commitment to not only conserve but enhance these areas over the next 25 years.
- The opportunity for interested companies to have the confidence to provide an offshore "ring main" approach to combining the cabling requirements of a number of windfarms and consolidating this into one landfall site and cable route to the grid.

In the case of Suffolk, there is an additional dimension to the multiple landfall of offshore connections from windfarms and inter-connectors by virtue of this being the same location for the Sizewell C nuclear power station. It is critically important that the Planning Inspectorate has the full ability to assess the cumulative impact of all of these schemes on a sensitive coast and landscape and that each Examining Authority should deal with the interaction of all of these schemes being delivered in the same area at the same time. This should include consideration if mitigation measures for both construction and operational periods could be optimised if planned in-combination.

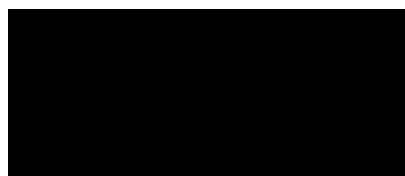
In summary, the Councils' concerns are that over the years, the development of the way in which new energy schemes are licenced, funded and permitted has resulted in a process which is ad hoc and does not offer the opportunity to assess whether the schemes are environmentally acceptable or to minimise the impact of them on the environment and to achieve the best value for the consumer, contrary to the Government's policy objectives. It is hoped the engagement with Ministers and officials, as that highlighted above, via Simon Ridley, will ensure the sensitive development of these significant projects.

On 11 and 12 March, the Cabinets of both Suffolk Coastal District Council and Suffolk County Council resolved to ask the Government to take a clearer leadership role on managing energy projects in a way that would reduce the environmental impact and be more effective for the consumer. We would be pleased to be able to discuss this further with Ministers of all departments involved and to consider possible solutions.

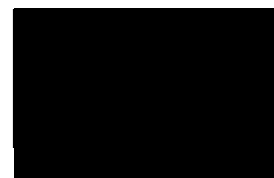
Yours sincerely,



Cllr Matthew Hicks  
Leader  
Suffolk County Council



Cllr Ray Herring  
Leader  
Suffolk Coastal District Council



Mark Bee  
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Amanda Webb and Matt Coyne  
The Department for Business, Energy  
and Industrial Strategy (BEIS)

Dear Ms Webb and Mr Coyne

I refer to the letter from Rt Hon Claire Perry MP dated 23 April 2019 (received here on 21 June). In it, there is an offer for us to meet with BEIS officials to discuss the concerns that we have, as expressed in the letter sent to the Secretary of State by the Leaders of Suffolk County Council and the former Waveney and Suffolk Coastal District Councils on 29 March 2019. It was suggested that we contact you to set up such a meeting.

In order to help set the framework for such a meeting, it is useful to set out again the issues that we would wish to explore with you. We do recognise the quasi-judicial role of BEIS in applications for Development Consent Order. We will be pressing the Planning Inspectorate and the Examination Panels to take full account of the in-combination impacts of multiple schemes and will continue to follow-up the implications of this with the Ministry of Housing, Communities and Local Government.

What we would wish to discuss with you at this time is the issue raised in the Offshore Wind Sector Deal and quoted in Ms Perry's letter of 23 April looking at the strategic deployment issues, including onshore and offshore transmission. Our concern is that the nature of the existing regulatory framework discourages the adoption of new uses of transmission technology that could well reduce the impact on onshore environments and be less costly to the consumer.

We have discussed these proposals with businesses in the offshore wind industry and with Government agencies and consider that there are likely to be practical opportunities to take this forward.

Therefore, from our perspective, the agenda could focus on the following issues:

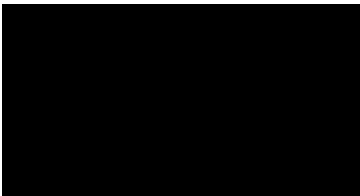
- 1) Weakness and opacity of the CION process – the need for changes to this.
- 2) The opportunity for hybrid offshore projects, linking together offshore wind schemes as well as inter-connectors, to reduce environmental harm whilst minimising costs.

- 3) The need to take a more strategic look at the locations where cables come to land and connect with the grid, rationalising these and taking a longer term view of these opportunities rather than, as seems to us at the present, a series of ad hoc decisions that appear to be taken by National Grid based solely on available capacity rather than strategically looking to the long term.
- 4) The need for guidance from Government to the industry and stakeholders regarding community benefits from offshore wind farms in line with that previously produced for projects onshore.

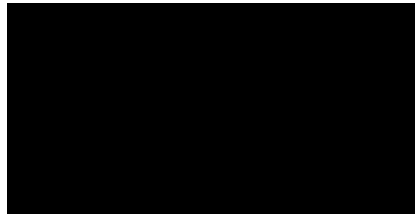
As well as the team we have met before, we consider that it might be helpful to include Mr Yuen Cheung or someone else from the BEIS Offshore Wind Team. We are aware that the Crown Estates is also looking at this issue and it might also be useful to include a representative from the Marine Planning and Consents Team. A further organisation which is likely to be of assistance in this discussion would be Ofgem.

It may well be that there are other appropriate people who you consider should be at such a meeting and we would be delighted if they could be involved.

Yours sincerely



Cllr Matthew Hicks  
Leader of Suffolk County Council



Cllr Steve Gallant  
Leader of East Suffolk Council



Rt Hon Andrea Leadsom MP  
Secretary of State for Business,  
Energy & Industrial Strategy

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13 January 2020

Dear Secretary of State

**Strategic planning around offshore wind developments in the southern North Sea and anticipated impacts on communities in the East Suffolk and North Norfolk local authority areas**

As the Leaders of East Suffolk Council and North Norfolk District Council, we were copied into correspondence sent to you by George Freeman MP for Mid-Norfolk and Therese Coffey MP for Suffolk Coastal on 28<sup>th</sup> October 2019; highlighting the significant environmental challenges East Anglia now faces in accommodating onshore infrastructure associated with the much needed growth in offshore wind generation in the southern North Sea.

We recognise that you subsequently proposed a review of the grid connection allocation policy but respectfully suggest that any development of an Offshore Ring Main (ORM) may be at least 10 years from being able to be delivered. This is a serious concern for our two councils as both areas are, and will continue to be, subject to numerous offshore wind generation schemes seeking to access the National Grid in, or across, our districts. This will result in significant impact on communities in our areas through multiple construction programmes covering large areas impacting on agricultural and tourism businesses and causing short, if not long-term, environmental damage through removal of hedgerows, disturbance to soil structure etc in areas of high landscape character and ecological value. The letter to you from George Freeman MP and Therese Coffey MP eloquently sets out the impacts that will occur in our areas and these should not be underestimated nor, and as importantly, the strength of local feeling that is emerging against these proposals, as it appears to the communities that their voices will not be heard through DCO Examination processes given the essential need for this renewable source of power.

It is calculated that with all the offshore wind that is in place, under construction and proposed, approximately 40% of the UK's electricity (approximately equally distributed between our two councils) will be routed via onshore cable connections coming ashore through our two districts. Additionally, East Suffolk also hosts nuclear generation at Sizewell B and will be likely to host the new Sizewell C station, subject to the DCO being granted, probably later in 2021, given their current published timescales for submission.

It should also be recognised that in addition to all the clean energy cited above, North Norfolk also hosts the Bacton Gas Terminal which handles over one third of natural gas supply into the UK from domestic gas fields in the North Sea and from the Continent via interconnector pipelines. The Bacton Gas Terminal facility is critical national infrastructure for the UK energy supply and is anticipated to have a further thirty-year life, being an important element of our energy security and the UK's transition towards a zero-carbon economy by 2050.

Our two councils have, to date, positively embraced the offshore wind developments in the southern North Sea, recognising their national importance as we move towards a zero carbon energy market; and the economic opportunities and benefits they are also bringing to the regional economy in Norfolk and Suffolk - particularly in port towns such as Lowestoft and Great Yarmouth; but also in the wider supply chain across the two counties.

Notwithstanding these strategic benefits and opportunities for Suffolk and Norfolk, the number and scale of offshore wind proposals now coming forward is raising increasing concerns amongst communities in East Suffolk and North Norfolk where the impact of new landfall points, cable corridors and related infrastructure and potentially grid connections are considered to be significant such that our two councils strongly believe that we should be appropriately recognised for our significant contribution to securing the nation's future clean energy needs.

Our concerns in this regard relate to the fact that our two councils are now facing multiple offshore wind proposals, promoted by numerous energy companies, all developing their individual schemes in what appears to be an uncoordinated system, where strategic planning and cumulative impacts are not able to be properly assessed. (see attached summary of all the offshore wind schemes coming through our two council areas).

This lack of coordination is currently resulting in many of our local communities facing major programmes of engineering works required to lay many kilometres of cable runs across sensitive landscapes and the industrialisation of areas of high landscape value and sensitive / designated countryside for the development of grid connection infrastructure with no local benefit whatsoever to offset such significant impacts. These impacts are/will be compounded by the lack of quality transport infrastructure to access these relatively isolated locations by heavy plant and machinery for the whole of the lengthy construction periods.

At the heart of the significant concerns our councils have to the consenting route of the current and emerging proposals is the process of grid connection allocation which then dictates how individual schemes are subsequently developed. A number of agencies – your Department, Ofgem, The Crown Estate, National Grid Systems Operator, National Grid Electricity Transmission and individual developers and Offshore Transmission Owners - influence the way in which offshore windfarms connect to the National Grid, but no one agency or organisation appears to take an overview to ensure the most efficient, economic and environmentally responsible approach to delivering new offshore capacity and other key new energy infrastructure proposed in an area. This is compounded as such decisions are then presented as a fait accompli during the DCO process.

In seeking to highlight and address this challenge, the Deputy Leader of East Suffolk Council, Cllr Craig Rivett along with Therese Coffey MP, met with Kwarsi Kwarteng, MP and Minister of State for Energy on 16th October 2019 to highlight the cumulative impacts of the offshore wind proposals landing in just East Suffolk. He was very receptive to our concerns and asked for his civil servants to prepare a briefing note on the potential for the Offshore Ring Main and to set up a meeting with the Chief Executive of National Grid to understand the grid connection offer process in more detail. It was also confirmed at that meeting that Kwarsi Kwarteng MP was advised by civil servants that it would be at least 10 years before an economic and deliverable ORM could be in place. This places an even greater need for the review you have announced you wish to be undertaken to be commenced as soon as is practical.

In our view, the current approach to the provision of onshore infrastructure leads to significant adverse impacts on the environment and the local (usually tourism) economy where landfall is made and then the

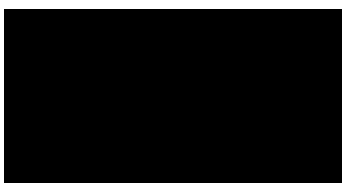


associated substantial new buildings (required for AC transmission systems) and infrastructure required to establish the connections to the grid. These include an inability to have a long-term approach to an offshore grid, an inability to achieve efficiencies in cable routes, and inefficiency and confusion at Examination stage when several schemes are assessed independently. If this approach continues, we believe it will destroy many cherished parts of our districts, as most, if not all, of the known schemes yet to commence will be likely to be going through the DCO process in the next five years and certainly well ahead of any definite plans for an ORM as current proposals cannot be prepared in anticipation of an ORM being in place.

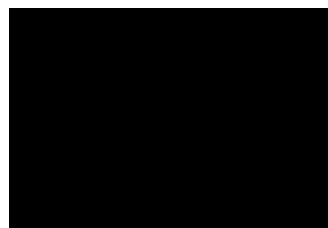
This significant delay to deliver a viable ORM, or have an alternative process/approach in place, will not offset the challenges we, as local authorities, now have to face with offshore wind farm operators looking to secure approval for their Development Consent Orders in the next five years. Proposals which have reached the DCO stage have been granted time limited licenses from the Crown Estate, have firm offers for connections in to the National Grid in place, with a clear remit to deliver their projects to help the UK have a secure and stable energy supply as well as meet our climate change obligations. It therefore appears to our councils that the known offshore developments will almost certainly happen, and, in making these decisions, limited weight will be given to the individual and cumulative impacts of the developments on the host communities in our respective districts. This will result in significant local harm, with huge local disruption and inconvenience to local, host communities with no mechanism to fully and properly mitigate, or compensate, for the impacts of our areas hosting at least half of the nation's essential energy infrastructure in our districts.

We would therefore welcome the opportunity to meet and discuss with you and your ministerial colleagues, the challenges we face at a local level in seeking to support the development of these major new energy projects and work with your government to develop and manage the delivery of a strategically robust approach to energy infrastructure delivery onshore in our areas. We appreciate that the currently known offshore schemes are unlikely to be delayed until a viable ORM is in place; nevertheless a strong partnership approach acknowledging the role national and local government has in embracing the opportunities these schemes can play in meeting carbon reduction targets as well as properly acknowledging the role our communities have in hosting schemes and meeting this goal would be welcomed.

Yours sincerely



**Cllr Steve Gallant | Leader**  
East Suffolk Council



**Cllr Sarah Bütikofer | Leader**  
North Norfolk Council

cc Peter Aldous MP  
Duncan Baker MP  
Therese Coffey MP  
George Freeman MP  
Kwarsi Kwarteng MP and Minister of State for Energy

# Offshore Wind Farm Projects across East Suffolk / North Norfolk

Operating stage							
Project	Stage	Time of operation	Operator	Output Capacity	Council Area	Other notes	Wind Farm Details
<b>Galloper</b>	Operational since March 2018	2038 (approx. 30-year lifespan)	innogy SE	353 MW	East Suffolk	Landfall at Sizewell O+M facility: Harwich International Port	56 x 6.3MW turbines
<b>Greater Gabbard</b>	Operational since September 2012	Not known	SSE	504 MW	East Suffolk	O+M facility: old Waveney fish market in Lowestoft	140 x 3.6MW turbines
<b>Sheringham Shoal</b>	Operational since October 2012	2032 (approx. 20-year lifespan)	Equinor	312 MW	North Norfolk	Landfall: Weybourne O+M facility: Egmore Cable corridor to Salle in Broadland District. PTVs based at Wells Harbour.	88 x 3.6MW turbines
<b>Dudgeon</b>	Operational since October 2017	2042 (approx. 25-year lifespan)	Equinor	402 MW	North Norfolk	Landfall: Weybourne O+M facility: Great Yarmouth. Cable corridor to Necton in Breckland District.	67 x 6MW turbines
<b>Race Bank</b>	Operational since February 2018	2043 (approx. 25 year lifespan)	Orsted	580 MW		O+M facility: Grimsby Landfall in the Wash Onshore Substation at Walpole. Very close to Wells-next-the-Sea with impacts for Wells fishermen etc but no direct impact on District.	91 x 6MW turbines

Construction stage							
Project	Stage	Time of operation	Operator	Output Capacity	Council Area	Other notes	Wind Farm Details
<b>East Anglia ONE</b>	Full operation expected 2020	Expected 2050 (approx.) 30 years	SPR	714 MW	East Suffolk	Cable route Bawdsey to Bramford O+M Facility: Lowestoft Port	102 x 7MW turbines
Consented							
Project	Stage	Time of operation	Operator	Output Capacity	Council Area	Other notes	Wind Farm Details
<b>East Anglia THREE</b>	Consented 2017	Expected 30-year lifespan	SPR	<1,400 MW	East Suffolk		110-172 x 7-12MW turbines
Projects due for/at examination							
Project	Stage	Time of operation	Operator	Output Capacity	Council Area	Other notes	Wind Farm Details
<b>East Anglia ONE NORTH</b>	DCO examination 2020, application submitted October 2019	Expected 30-year lifespan	SPR	<800 MW	East Suffolk		67 x 12-19MW turbines
<b>East Anglia TWO</b>	DCO examination 2020, application submitted October 2019	Expected 30-year lifespan	SPR	<900 MW	East Suffolk		75 x 12-19 MW turbines
<b>Hornsea Project Three</b>	Awaiting Decision – Examining Authority issued recommendation to Secretary of State 02/07/19. Deadline for decision now 29/02/20.	Not known	Orsted	2.4 GW	North Norfolk	Landfall proposed at Weybourne. Onshore cable route to new grid connection substation at Swardeston.	300 x TBC MW turbines

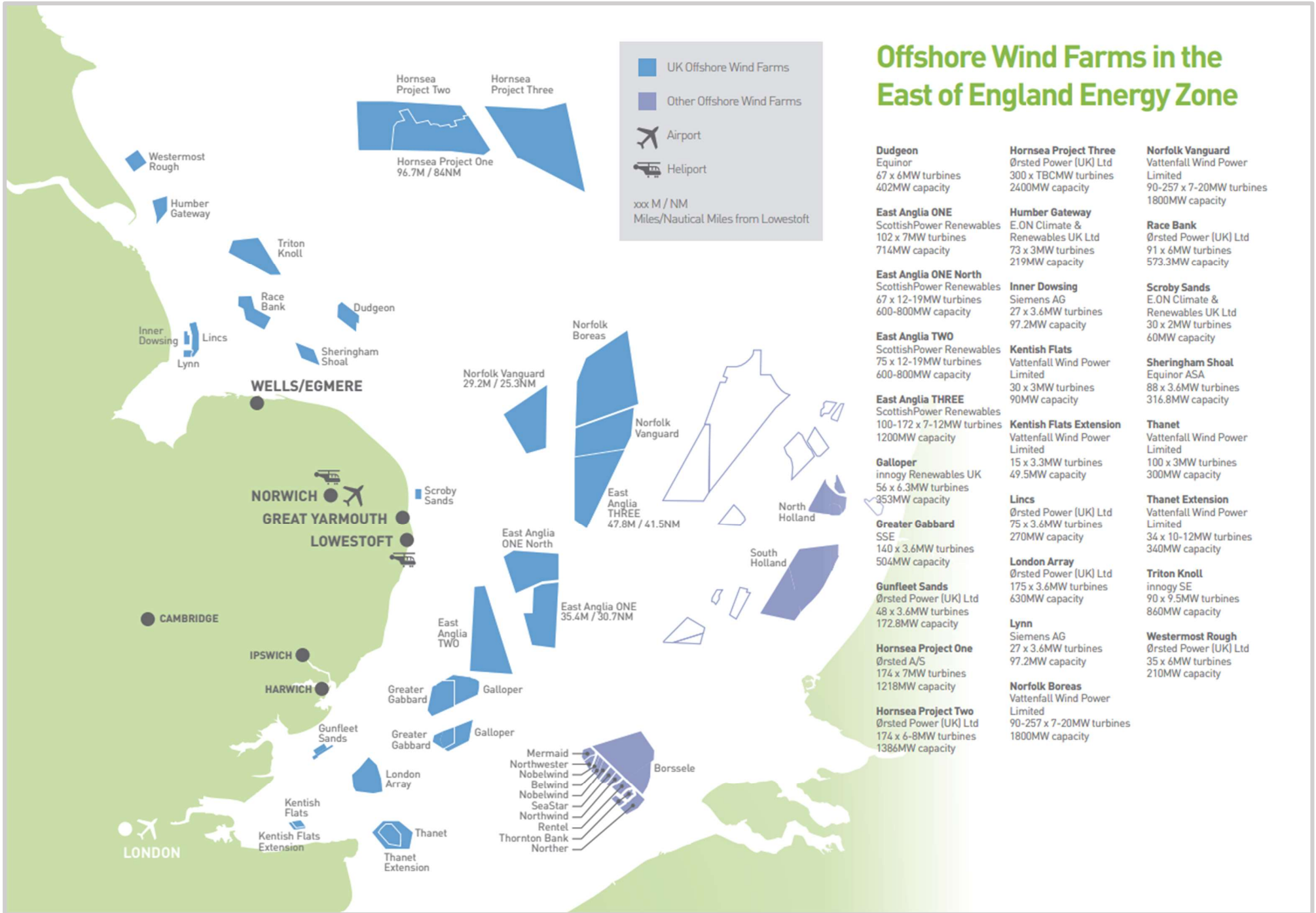
<b>Vanguard</b>	Awaiting Decision - Examining Authority issued recommendation to Secretary of State in 10/9/19. New deadline for decision set.	Not known	Vattenfall	1.8 GW	North Norfolk	Proposed landfall at Cart Gap near Happisburgh, onshore cable route to new grid connection substation at Necton in Breckland.	90-200 x 9-20MW turbines
<b>Boreas</b>	Examination began 12/11/19, due to finish 12/05/20.	Expected 30-year lifespan	Vattenfall	1.8 GW	North Norfolk	Following Vanguard scheme. Landfall proposed at Cart Gap, connection at Necton.	90-257 x 7-20MW turbines
Known / emerging projects							
Project	Stage	Time of operation	Operator	Output Capacity	Council Area	Other notes	Wind Farm Details
<b>Galloper Extension (Five Estuaries Wind Farm)</b>	Introductory / very early	Expecting to be operational by 2030	innogy SE	<353 MW	East Suffolk	Offered grid connection at Friston, offer is under consideration Cable route, landfall location, and onshore substation not yet known Rough timeline: Commencing stakeholder engagement Nov 19-Jan 20, scoping and HRA screening Mar-Apr 20, public consultation May 20. PEI Q3 21. DCO application Q2 2022. DCO consent Q4 2023.	
<b>Greater Gabbard Extension</b>	Introductory / very early Q2 2023 proposed for DCO submission. National Grid will	Not known	Innogy RWE (renewables subsidiary) and SSE	<504 MW	East Suffolk		

	confirm grid offer at end of Q1 2020.						
<b>Sheringham Shoal</b>	Scoping report released October 2019 (joint with Dudgeon)	Not known	Equinor	Will be 800 MW, combined with Dudgeon	North Norfolk	Landfall being explored at Weybourne or between Mundesley and Bacton. Grid connection offer at Norwich Main, south Norwich. Joint development with Dudgeon, common transmission infrastructure	
<b>Dudgeon Extension</b>	Scoping report released October 2019 (joint with Sheringham Shoal)	Not known	Equinor	Will be 800MW, combined with Sheringham Shoal	North Norfolk	Landfall potentially Bacton/Weybourne, connection at Swardeston Joint development with Sheringham Shoal	
<b>Race Bank Extension</b>	Not awarded an agreement for lease following plan-level HRA	Not known	Orsted	<573 MW		Export cable through the Wash, due north of Wells-next-the-Sea, connecting to NG at Walpole Main Station. O+M base at Grimsby. Visible from North Norfolk and potential impact on North Norfolk fishermen.	

## Related Projects

Project	Stage	Time of operation	Operator	Capacity	Council Area	Other notes	Details
<b>Nautilus Interconnector</b>	Expected DCO submission Q2 2020	Could be operational by 2028	National Grid Ventures	1500 MW	East Suffolk	Connected at Sizewell Connected to Belgium	

<b>Eurolink Interconnector</b>	Introductory / early		National Grid Ventures	1600 MW	East Suffolk	Connected at Sizewell Connection to Holland	
Related Projects							
Project	Stage	Time of operation	Operator	Capacity	Council Area	Other notes	Details
<b>Sizewell C</b>	DCO application expected submission Q2 2020	Likely operation commences 2030	EDF	3340 MW	East Suffolk		Expected timeline: Construction expected to begin 2021, lasting 9-12 years



Our Ref: 20200309/MH/SG/MPSharmaAlok

Date: 09 March 2020

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[steve.gallant@eastsuffolk.gov.uk](mailto:steve.gallant@eastsuffolk.gov.uk)

The Rt Hon Alok Sharma MP  
Secretary of State for Business, Energy and Industrial Strategy  
1 Victoria Street  
London  
SW1H 0ET  
United Kingdom

Via email: [alok.sharma.mp@parliament.uk](mailto:alok.sharma.mp@parliament.uk)

Dear Rt Hon Alok Sharma MP

We are writing to follow up on the meeting we attended on Monday 2nd March between BEIS, OFGEM, National Grid, Planning Inspectorate, Environment Agency, New Anglia LEP and Local Authorities.

This meeting was a follow up to the meetings that had already taken place between departmental officials and Local Authority leaders on the 20th August 2019 and subsequently between Local Authority leaders and the Energy Minister Kwasi Kwarteng on the 16th October 2019 and the 5th of February 2020. In addition, representations were made by Local Authority leaders to the Secretary of State on the 13th January 2020. Furthermore, community groups have made repeated representations regarding the connection of offshore wind in Norfolk and Suffolk, including most recently their discussions with Local MPs that took place on the 2nd of March.

Whilst we welcome recent indications and publications from Ofgem and National Grid in respect of the issues we raise, we believe that the fundamental change required is in government policy with regards to delivering a national strategic approach to grid connection. All parties in Monday's meeting acknowledged that the current system and processes for delivering new energy to customers is not fit for purpose. This will only be exacerbated in the coming years as we all try to deliver the necessary capacity (75GW) to meet our net-zero targets. The government needs to invest in a new approach to grid connection which should be reflected in the forthcoming Energy White Paper. Our two councils are willing to support and be involved in helping to develop the new approach.



The meeting with your officials and partner organisations was a welcome opportunity for us to share the issues which our communities face as a result of the very significant energy developments necessary in order for the nation to deliver on its target of net zero carbon emissions. The issues we raised centred on the absence of a strategic, coordinated approach which has driven the use of radial connections and which does not enable the cumulative impacts on the environment and communities to be taken into account and reduced. These comments reflect the reluctant acceptance by the two councils that the projects being considered currently will be delivered prior to the commitment and delivery of a new approach to connection.

We appreciated the opportunity to talk to and hear from colleagues in the different organisations; however, we now need to turn the greater understanding of the issues which officials said they have garnered from the meeting into action to deliver a more effective approach to developing these nationally significant energy projects in both the short term. In our presentation to officials and during discussions, we suggested the following as areas for follow up:

- Need for a commitment from Government to take the lead formulating a new co-ordinated strategic approach to grid connections supported by relevant stakeholders and undertake the essential policy changes necessary to facilitate this.
- We want to agree with you a framework for effective ongoing engagement about future projects and network connections and reinforcements. We would like that engagement to include Crown Estate, National Grid, Government, Ofgem, the Environment Agency and Planning Inspectorate as well as Local Authorities and the LEP, to focus on strategic issues. This should reflect the approach advocated by National Grid as set out in section 2 of the attached letter.
- We want to see robust guidance from Government on the mitigation, compensation and community benefits, and clear expectations and mechanisms to deliver tangible economic benefit through the delivery/construction of such projects.
- We welcome the confirmation of the existing commitment to communities hosting new nuclear development (initially this commitment was made by Michael Fallon in 2013, and reconfirmed in 2017) based on a funding formula aligned to electricity production over the lifetime of a project but would argue that this should be extended to recognise the local ongoing impacts of Net Zero generation and transmission infrastructure.

In response we are willing to commit to identify the hard and soft infrastructure issues which impede the delivery of Net Zero projects and seek to resolve these where we can, and to create structures at the appropriate scale to facilitate engagement with National Grid, Government and others.

The discussions on the 2nd March, the emerging approach to connections set out in Ofgem's Decarbonisation Action Plan (DAP), Network Options Assessment 2020 and National Grid's response to the DAP indicate a genuine opportunity to develop an improved approach to the connection of offshore for the delivery of Crown Estate leasing Round 4, to eliminate or reduce significantly impacts of multiple radial connections.

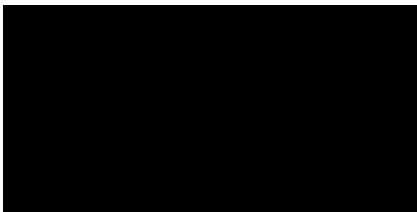
However, the Round 4 tendering process is progressing at pace and timely and effective co-ordination between all the parties is essential if these opportunities are to be realised. Our two councils have been informed by some potential bidders that the Round 4 process requires them to secure grid connection offers now to be de-risk the financial costs of bidding as much as possible. Therefore, the time to act is now.

We assert strongly that the Minister and the department officials need to provide clear co-ordination and leadership to all the parties involved to minimise the potential harm from Round 4 offshore wind and it's grid connections, whilst maximising the potential benefits alongside a government commitment to deliver a new strategy for connection.

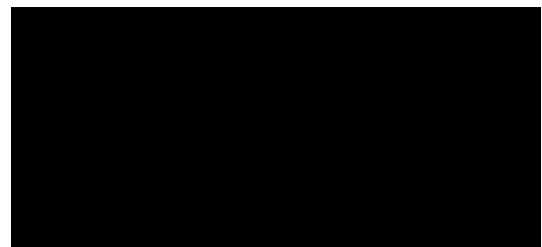
As set out above we consider the Energy White Paper is the opportunity to establish this approach and would set a basis for the delivery of an integrated and co-ordinated approach, led by the Government intent on achieving net-zero targets in the most sustainable way possible for the connection of offshore wind.

We look forward to your response to this letter and confirmation of the next steps for this process.

Yours sincerely



**Matthew Hicks**  
**Leader**  
**Suffolk County Council**



**Steve Gallant**  
**Leader**  
**East Suffolk Council**

Cc  
The Rt Hon Robert Jenrick MP  
The Rt Hon George Eustice MP  
The Rt Hon Therese Coffey MP  
Peter Aldous MP  
Dr Daniel Poulter MP



Rt Hon Kwasi Kwarteng MP  
Minister for Business, Energy and Clean  
Growth

cc Rt Hon Thérèse Coffey MP

**Your ref:** OTNR 15/07/20

**Date:** 5 August 2020

**Please ask for:** Phil Watson/Naomi  
Goold

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[naomi.goold@east Suffolk.gov.uk](mailto:naomi.goold@east Suffolk.gov.uk)

Dear Rt Hon Kwasi Kwarteng MP,

We appreciate the time you have taken previously to meet with us and Rt Hon Therese Coffey MP on 16 October 2019 and 5 February 2020 and your engagement since. We welcome the publication of the Terms of Reference for the Offshore Transmission Network Review (OTNR) on 15 July 2020, and the contribution our dialogue has had in increasing understanding of the challenges faced in East Suffolk in relation to energy infrastructure helping to lead to this review.

We recognise the very significant role Suffolk has to play in delivering the UK's Net Zero target, due to its geographical positioning and other advantages, and to ensure this contributes to post Covid-19 economic recovery both locally and nationally. Your review is an important opportunity to ensure this is not at the expense of the communities and environment of Suffolk.

Our reading of the Terms of Reference is that with the exception of East Anglia Three, all the other planned projects in Suffolk<sup>1</sup>, including East Anglia One North and East Anglia Two, are within scope of the OTNR Medium Term Workstream as they are due to connect between 2025 and 2030. We understand the Medium Term Workstream will not only be considering the opportunities available to increase the level of coordination in relation to the provision of energy infrastructure, but also considering measures which could be utilised to incentivise developers to engage with this work, thereby addressing some of the barriers. We see incentivising developers to engage as fundamental to its success. We expect BEIS to take a strong lead on this as it is crucial that engagement with this review is not dependent on individual developers' appetite.

As you will be aware the East Anglia One North and Two Development Consent Order (DCO) applications have been submitted to the Planning Inspectorate with Part 1 of the Preliminary Meeting scheduled for 16 September 2020. If consented, the Order Limits, Rochdale envelopes and connections for the projects will effectively be fixed. Given this, we would like to understand how BEIS intend to manage the interaction

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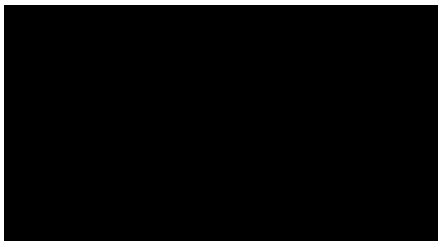
between the examination of these projects and the review, and in particular whether the timing of the examination will and should be affected by the OTNR? Understanding this is, we know, of vital importance to the affected local communities who will also welcome the review. Given the potential implications of the review, the Councils will be seeking legal advice on this issue.

Your review is a real opportunity to significantly reduce impacts on our communities and environment through consolidation and coordination across all the in-scope projects. We would wish to see a comprehensive solution encompassing both the SPR East Anglia One North and Two projects and the proposed Round 3 extensions. We consider that a comprehensive solution incorporating a High Voltage Direct Current (HVDC) offshore grid connecting to one offshore location and perhaps incorporating an interconnector project, would be possible, although ambitious. We recognise there would be significant regulatory and commercial obstacles to be overcome to achieve this, but such a project would be an effective pathfinder to support the development of an enduring regime. It appears that such a pathfinder project could only be developed by a third party Offshore Transmission Operator (OFTO), and that the developer-build OFTO model is a significant obstacle to integration of offshore connections. We recognise that there are less ambitious options for the Medium Term Workstream which could consolidate existing projects, but we would urge both the government and developers to use the OTNR to test an ambitious model for the offshore connections enduring regime.

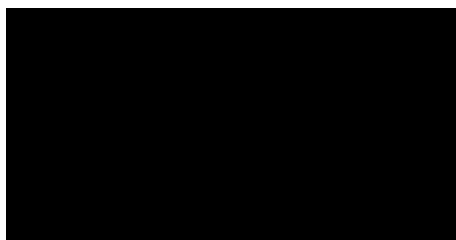
We are grateful to your officials for their continuing engagement with us on both the OTNR and the wider issues relating to the development of offshore wind and interconnectors in Suffolk.

We look forward to continuing to work with you on these matters to enable Suffolk to support effective progress towards Net Zero for the UK, whilst ensuring this is not to the detriment of our communities and environment.

Yours sincerely



Richard Rout  
Cabinet Member for Environment & Public  
Protection  
Suffolk County Council



Craig Rivett  
Deputy Leader and Cabinet Member for Economic  
Development  
East Suffolk Council

<sup>1</sup> Nautilus and Eurolink Interconnectors promoted by National Grid Ventures,  
Round 3 Extensions - Galloper Offshore Windfarm Extension promoted by Innogy, Greater Gabbard Offshore  
Windfarm Extension promoted by SSE  
SCD1 HVDC Link promoted by National Grid Electricity Transmission.



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Date: 24 September 2020

Dear Ms Barnett and Ms Camey,

### **Increasing the level of coordination in offshore electricity infrastructure**

We write in response to the letter dated 24 August 2020 published as part of the Offshore Transmission Network Review. The letter seeks views from the industry and other interested parties, as to what has prevented the development of coordinated transmission assets to date, particularly seeking views of stakeholders who are already pursuing some level of coordination, or have identified an opportunity to do so. Although it is understood that significant information can be gained from developers and electricity transmission licensees regarding the barriers they face, local Councils can also provide a useful perspective, based on their experience to shape the future policy and regulatory framework.

### **The need for whole system change**

It is likely that a technical solution to the development of an offshore transmission network can be developed. Given the very large amount of new connection and generation infrastructure required to deliver net zero and the resources and conditions in East Suffolk and East Anglia for fixed foundation offshore wind and interconnectors, we anticipate that a great deal of that power may need to be connected in this locality.

Therefore, it is not adequate only to address the technical issues and modify the regulatory and competition regimes accordingly. We consider that it is necessary to make far reaching changes to the delivery of these projects and the relationship between the promoters of the schemes and the communities in which they are located. The promoters include not only the specific energy businesses, but also the Crown Estate and the Government, who seek to deliver a revenue stream from their assets and achieve net zero.

The Councils consider that there are significant barriers to overcome in relation to:

- Regulation
- Process and procedure
- Promoter risk aversion
- Community opposition

### **Offshore Transmission Owner (OFTO) Regime**

A fundamental change needed in order to meet the net zero targets and associated energy infrastructure needs, is a revision to the existing OFTO regime. At present, although it is understood the option for a third party OFTO is available, this option has not been taken up. Instead, the connection infrastructure is provided by the developer. This is the favoured option as it provides the developer greater confidence and control over the delivery of the infrastructure. Although the preferred route for delivery, developer-led OFTO impedes coordination, as a developer's sole focus is the delivery of their own project and not on the best coordinated outcome for communities and the environment. There needs to be clear policy changes which result in the default position for the delivery of onshore connection infrastructure being through a third party OFTO. Market mechanisms could then be utilised to ensure the best value through competition. A by-product would be the natural consolidation and coordination of projects which does not occur when each developer is responsible for their own connection infrastructure.

As stated, a barrier to the use of third party OFTO's is the perceived risk regarding the security in the delivery of the infrastructure. It is important to find a way to de-risk this for developers. This barrier needs to be tackled from both sides, firstly making a third party OFTO the default position and secondly through the provision of measures to de-risk the delivery of the required infrastructure.

### **Onshore Connections**

It is essential that opportunities for coordination need to be identified at the earliest possible stage of any project. There is currently a lack of coordination being delivered by National Grid Electricity Systems Operator (NGESO). The current regime where the connections process allows developers to request and NGESO to grant connection offers to projects without consideration of whether there are any opportunities for coordination is a significant barrier to providing coordinated infrastructure. Greater coordination at the connections stage would go hand in hand with the presumption in favour of third party OFTOs. If a coordinated option is identified, however, this should be considered in terms of its environmental impacts (at the plan level rather than solely the project level) prior to any collective connection offers being granted.

### **Anticipatory Investment**

Directly associated with the issue regarding the connections process is the risks involving anticipatory investment. It is essential that greater certainty and clarity in relation to recovering costs for this work is provided. The Councils have experienced developers advising that there is a lack of certainty over how the costs of anticipatory investment can be recovered, this has

implications for project funding and a potential Contract for Difference bid. Our experience is that this is significant a barrier for greater coordination between related projects.

The reluctance for developers to undertake anticipatory investment is also mirrored by National Grid and their unwillingness to design a substation, which is capable of providing a point of connection for multiple projects rather than on the individual project basis currently being designed. We understand that National Grid's reluctance to provide infrastructure with future capacity also relates to the risk involved in recovering the costs.

### **Incentives**

It is considered that there are insufficient incentives available to encourage developers to seek coordination. If the perceived risks are considered too high, further consideration should be given to measures which could be made available to help to de-risk projects and reduce the unease to provide greater coordination, which generally reduces costs and impacts.

### **Consenting Process - Flexibility**

We see that there is potential for the option of greater coordination and consolidation of projects post consent with the Development Consent Order process. The 'Rochdale Envelope' in theory provides flexibility for consolidation of related and adjacent projects post consent, providing the impacts and order limits do exceed that of the consented project or projects.

This flexibility is especially important at present, with regulatory and technological change occurring as projects are brought forward and consented. Further advice and clarification is required as to how this apparent flexibility could be used to co-ordinated and consolidate connections post consent.

### **Consenting Process - Communities**

Lastly, it is recognised that the delivery of a coordinated and integrated offshore network is likely to require connection infrastructure for multiple projects to be provided onshore in strategic locations. The Councils recognise that one barrier to the delivery of the coordinated network is likely to come from the local communities affected by the proposals. It is essential it is understood that the delivery of net zero targets and the associated infrastructure, even with optimum coordination, cannot be provided without contentious and often significant impacts. It is, therefore, essential that associated with any solution should be a community benefit scheme which recognises local impacts and provides appropriate compensation.

Broadly, we consider there should be clear requirements for developers on how and when to engage with communities and local Councils on community benefit, mitigation, and compensation funding. This is necessary both to ensure that communities receive appropriate mitigation and compensation, and so that they also have the confidence to engage early enough with developers to be properly effective.

These requirements should consist of minimum tariffs for community benefit schemes, that can be adjusted for inflation. Likewise, it is essential that economic growth, employment, supply chain and skills growth and educational inspiration, deliver tangible benefits to the locality.

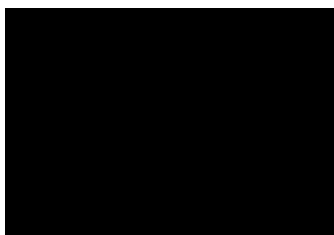
Together these outcomes would constitute a new settlement for communities which would recognise the magnitude of change they will be asked to undergo to deliver generation and connection infrastructure. This comprehensive approach is necessary because the unprecedented scale and extent of infrastructure that is required to achieve net zero, notwithstanding any coordination and consolidation of infrastructure.<sup>12</sup>

## Summary

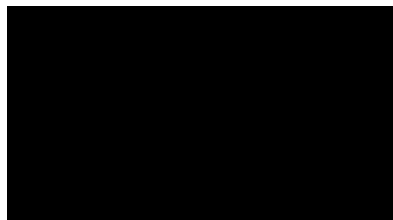
The development of energy projects to deliver net zero will play an important part in the post Covid-19 economic regeneration, both nationally and locally. This can only be achieved if accompanied by a suite of far-reaching changes to the processes for project coordination and delivery, and a new settlement with tangible and wide-ranging benefits for host communities.

We consider that there may be short term opportunities to modify the implementation of current regulations. There is also an opportunity to make more substantial changes to current regulations, using Ofgem's sandbox approach.<sup>3</sup> This flexibility could also be applied also to other regulatory frameworks, as a prelude and pathfinder for more comprehensive changes to the enduring regime. We consider such a flexible and adaptive approach would help to expedite a pathfinder project, or projects, for coordinated transmission in East Anglia.

Yours sincerely



James Cutting  
Head of Planning  
Suffolk County Council



Philip Ridley BSc (Hons) MRTPI  
Head of Planning and Coastal Management  
East Suffolk Council

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<sup>1</sup> SCC response to BEIS Contract for Difference Consultation - <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/major-infrastructure-projects/Response-to-CfD-Consultation-270520.pdf>

<sup>2</sup> SCC ESC and Partners evidence to the Environmental Audit Committee – May 2020  
<https://committees.parliament.uk/writtenevidence/5069/pdf/>

<sup>3</sup> <https://www.ofgem.gov.uk/news-blog/our-blog/ofgem-launches-new-enhanced-energy-regulation-sandbox-service>





Ms Alice Etheridge  
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Senior Manager  
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**BY EMAIL**



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Your Ref:  
Our Ref:  
Date: 27<sup>th</sup> October 2020

Dear Alice,

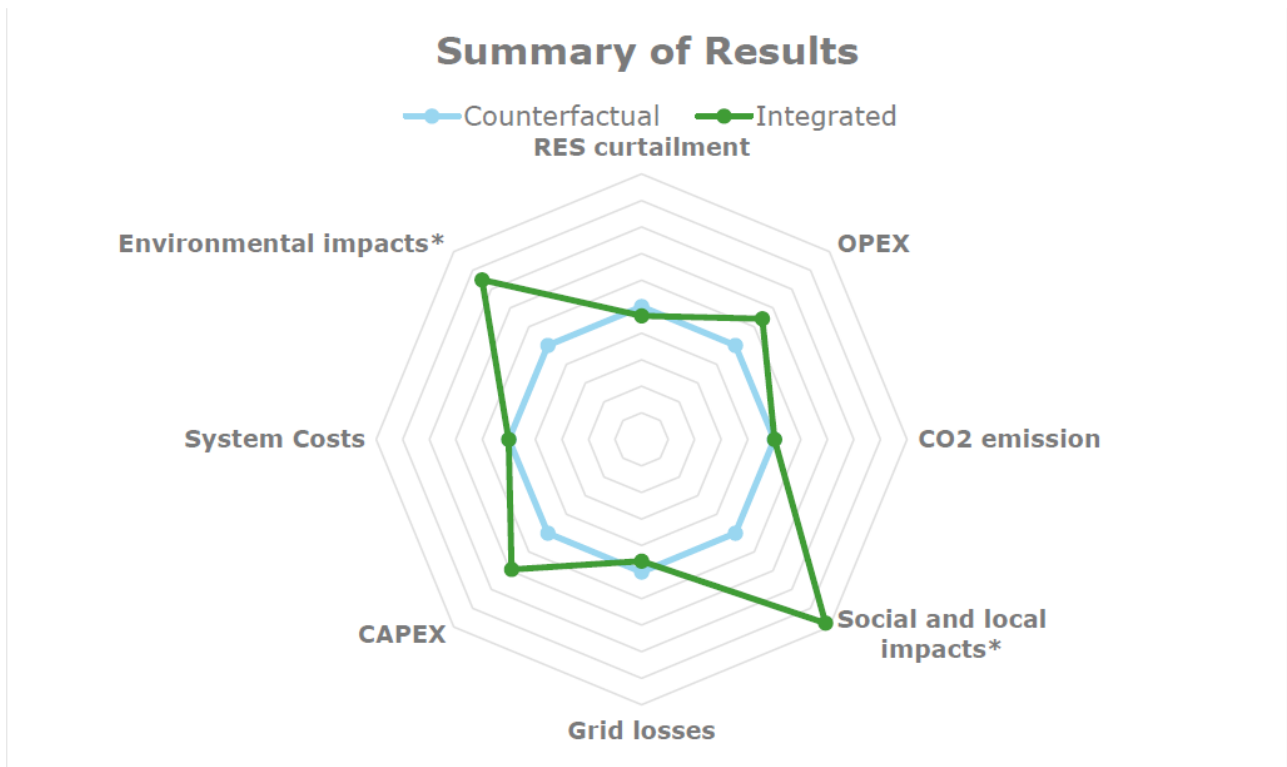
**Offshore Coordination Project Consultation**  
30<sup>th</sup> September - 28<sup>th</sup> October 2020

**Summary of this response**

- The consultation identifies clear benefits from the coordination of offshore connections, for both communities and the environment and for capital and operating costs
- Substantive pathfinder projects before 2030, enabled by a dynamic, adaptive, and flexible approach to regulation from Ofgem and BEIS, will be essential to realise the most substantial benefits of coordination.
- Substantive pathfinder projects before 2030 will support energy sector confidence and the adaptation of supply chains, whilst minimising the impacts of new infrastructure on communities and the environment.
- Notwithstanding the benefits of coordinated offshore networks, a new settlement for communities, to ensure that they are adequately compensated for residual impacts, that cannot be mitigated is essential.
- The consequences of coordinated offshore connections, for the future reinforcement and modification of the onshore grid, is of significant concern. Although we recognise that this is outside the scope of the OTNR

Suffolk County Council and East Suffolk Council welcome this consultation and its findings. The Councils are also very grateful to National Grid Electricity System Operator (NGESO) for its sustained and effective engagement with their officers, during the development of this project and during the consultation.

This first phase of the Offshore Coordination Project has set out a new approach to offshore transmission. Even at this early stage, there are clearly benefits not just for the environment and local communities, but also for capital and operating costs as summarised in figure 2-4 of the cost-benefit analysis reproduced below.



However, this phase has identified that there are significant technological and regulatory challenges to be overcome if the benefits of this approach are to be secured. Furthermore, early and decisive action will yield a much greater reduction in the scale of infrastructure required through coordination, in both the short and long term.

We consider that substantive pathfinder projects before 2030, enabled by a dynamic, adaptive, and flexible approach to regulation from Ofgem and BEIS, will be essential. These will maximise the level of coordination, support energy sector confidence and the adaptation of supply chains, whilst minimising the impacts of new infrastructure on communities and the environment.

#### **A new definition of coordinated and efficient transmission**

The work set out in this consultation finds that significant cost savings (18% lower total lifetime cost) and a significant reduction in land take and seabed use, can be achieved through the coordination of offshore connections. As such, the findings of this report change the definition of what is, under the terms of the Electricity Act 1989, s9(2) “a *coordinated, efficient and economic system of transmission*”.

Previously, this had been defined by the fact that National Grid and others had deemed, in the *Integrated Offshore Transmission Project (East) Final Report Conclusions and Recommendations August 2015*, and other studies, that there was insufficient volume of Offshore Wind Farm (OWF) development, to support the coordinated connection of offshore wind. Further, they considered that, “*By pursuing a non-integrated design both National Grid and the offshore generation developers can maintain closer control over the scope and programme of their individual works, and hence minimise risks for consumers and investors alike*”.

#### **Early deployment secures greater benefits**

As a result of these previous findings, the regulatory regime and connections process has been designed and operated to deliver lowest cost single radial connections. Therefore, this formal change of position, principally in light of the much greater volume of OWF generation now expected, in order to deliver Net Zero by 2050, will have significant and widespread impacts on the current regulatory and commercial frameworks.

In terms of regulatory and commercial frameworks, it is notable that this consultation report makes a clear distinction between what could be achieved, and what it is considered likely to be achievable. By way of example, the report Holistic Approach to Offshore Transmission Planning says:

*The number of landing points required for the integrated solution is estimated to be 30 by 2050, whilst for the status quo it is 105. The number of network assets in the integrated option would be 60% lower by 2030, 70% lower by 2050. These figures relate to onshore substations, export cables and offshore platforms.*

Whilst the benefits are clear, both Councils consider that it is unfortunate that the same report goes on to say that, “we feel this level of reduction is at the upper end of estimates as it is based on the assumption that full integration takes place before 2030. However, this may not be achievable, with changes more likely to happen in a phased way up to this date. We consider a 50% reduction may be a more realistic estimate”.

The report clearly identifies that the rapid and early deployment of integrated solutions would secure greater benefits in the long-term. Therefore, it is essential that every effort be made to make full integration by 2030 achievable.

### **Securing the benefits of the proposed changes**

The report is also clear that there are significant technological challenges, particularly in relation to cabling and High Voltage Direct Current Circuit Breakers. It is notable that the *Progress on Meshed HVDC Offshore Transmission Networks* project<sup>1</sup> is looking at these issues in detail, and testing various solutions, building on the deployment of HVDC circuit breakers in China.

The Councils consider that in order for these technological hurdles to be overcome, an early pathfinder project or projects will be needed, such an approach would seem to be consistent with the objectives and purpose of the Offshore Renewables Catapult.

Pathfinder projects would also be likely to require short-term regulatory flexibility. Ofgem’s sandbox framework appears to be suitable. This approach to flexible regulation, trials new approaches to regulation and deployment of new systems. The description of the sandbox approach set out by Ofgem<sup>2</sup> includes:

- *Bespoke guidance on interpreting regulations and how they might apply to an innovator’s specific trial circumstances.*
- *Comfort about our approach to compliance and enforcement for the purposes of a trial.*
- *Confirmation that a proposition is permissible.*
- *Formal relief (a derogation) from a specific rule (from a licence or code) that an innovator is not able to comply with.*

This appears to offer the model of a way forward to enable the more rapid deployment and testing of new technologies, and to build developer confidence in respect of potential regulatory and investment uncertainty. Learning from this process would also inform the development of a new enduring regime.

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<sup>1</sup> <https://www.promotion-offshore.net/fileadmin/PDFs/D12.4 - Final Deployment Plan.pdf>

<sup>2</sup> <https://www.ofgem.gov.uk/about-us/how-we-engage/innovation-link>

A Crown Estate's press release regarding Round 4 on the 15<sup>th</sup> of October<sup>3</sup> states that, "*once consented through the statutory planning process, Round 4 projects could begin generating clean power by the end of the decade*". Given that these projects are at the very earliest stage of development, a regulatory sandbox for the delivery of Round 4 in this region, would be an effective pathfinder for the implementation of the enduring regulatory regime after 2030.

In addition, current emerging projects (particularly interconnectors and extension round projects) appear likely to be capable of adaptation to an integrated approach, given a reasonable degree of regulatory flexibility.

It is also the view of the Councils that appropriate regulatory flexibility could create an opportunity to consolidate infrastructure for the most mature projects post consent, at the detailed design and procurement stage, (particularly where they are being delivered by the same promoter or promoter group), without significant project delays.

The Councils consider that this variation in approach, based on project maturity, would be likely to facilitate and maximise appropriate opportunities for the coordination and integration of projects at all stages of development, connecting before 2030, and so enable the high levels of potential integration identified in the consultation report. Indeed, this is the conclusion of a paper commissioned for the Offshore Wind Industry Council and published in June 2020<sup>4</sup> which found that "*The later integrated solutions are developed, the lower the opportunity to realise the full benefits of these approaches*".

The benefits of pathfinder projects also extend to economic and supply chain adaptation, a benefit that has export potential. A clear regulatory signal would support the development of the necessary innovation, for both modified supply chains, and of the financing and commercial structures needed to deliver offshore meshed grids. This would be a significant benefit to the UK's competitive position for the delivery of offshore HVDC grids in the UK, and overseas, as well as accelerating the development of local supply chains and the necessary supporting skills.

### **Changes to the connection offer process**

Where changes to process are in the gift of the National Grid System Operator, a program of the short, medium, and long-term changes, that would support the coordination of connections has been set out. The Councils will be pleased to continue to work with NGENSO on the details of these changes in the second stage of this review.

In terms of the assessment of environmental impacts as part of the CION, the bundling of connections, and focus on fewer larger sites, means that an effective plan level assessment of the environmental effects of connection offers, both offshore *and* onshore, is likely to be essential.

### **The benefits for communities and the environment**

The consultation has identified that a significant reduction in infrastructure will be likely to reduce overall harm to public amenity and the natural environment, but it is also clear that a coordinated approach will lead to the creation of fewer, larger, onshore connection locations.

This finding underlines the need to develop a new settlement for communities to ensure that they are adequately compensated for residual impacts, that cannot be mitigated. This new settlement and approach is essential to develop a much greater degree of local benefit, for what is a major and far reaching transformation of the energy system.

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<sup>3</sup> <https://www.thecrownestate.co.uk/en-gb/media-and-insights/news/the-crown-estate-updates-timings-for-final-tender-stage-of-offshore-wind-leasing-round-4/>

<sup>4</sup> *De-risking Integrated Offshore Networks in GB* [https://www.hvdccentre.com/wp-content/uploads/2020/06/De-risking-Integrated-Offshore-Networks\\_v2.0\\_25June2020.pdf](https://www.hvdccentre.com/wp-content/uploads/2020/06/De-risking-Integrated-Offshore-Networks_v2.0_25June2020.pdf)

The spatial scale of cost-benefit analysis is for Great Britain which is logical for capital and operational costs. However, extrapolation of the data at a more localised level would assist with, for example, the comparison with Carbon Intensity.

The analysis of Carbon Intensity should interact with KPIs for land (e.g. sequestering and storing carbon) and capital costs (e.g. embodied carbon). The Councils would expect the results for CO2 intensity should flow more closely the savings to capital costs.

In the development of KPIs, an approach to comparing the costs-benefits for landscape value needs to be developed. The approach would be using natural capital and a lot of progress has been made recently to develop the robust evidence base, but the effectiveness of this approach tends to work on a project-specific level rather than policy development. However, approximations could be incorporated in the process and the Councils would welcome further dialogue so that this element is incorporated.

### **The next phase of the project**

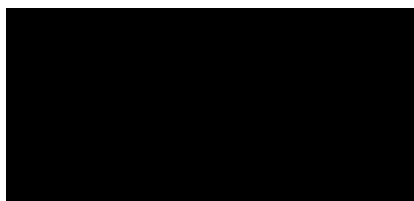
The Councils welcome the findings of the work undertaken so far and recognise its strategic nature and purpose to set out a vision for an integrated offshore network. Of critical importance to the realisation of this vision is much greater clarity and direction as to how this will be achieved. It is appreciated that many of these issues are matters that cannot be tackled by NGENSO, and we look to BEIS and Ofgem to articulate and resolve them.

The Councils understand that Phase 2 of this project will consider this in more detail, and we look forward to engaging with the next phase of this work.

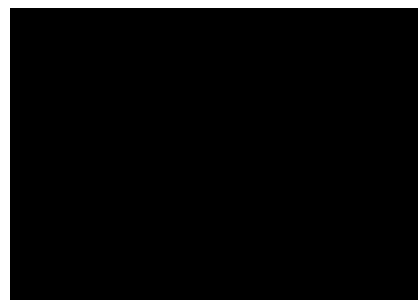
Furthermore, during phase 2 we hope that the potential consequences of coordinated offshore connections, on the reinforcement and modification of the onshore grid, will become clearer as this relationship is of significant concern, for both the Councils and Members of Parliament. However, we recognise that this is outside the scope of the OTNR.

Responses to the consultation questions on which the Councils are able to comment, are appended to this letter.

Yours sincerely



Richard Rout  
Cabinet Member for Environment &  
Public Protection



Craig Rivett  
Deputy Leader and Cabinet Member for Economic  
Development  
East Suffolk Council

## **Appendix – consultation questions and responses**

### **Holistic Approach to Offshore Transmission Planning Report**

*Q1. Do you agree with our assessment of the key technology and system risk barriers coming from the Holistic Approach to Offshore Transmission Planning Report?*

Based on our limited understanding of these issues the problems identified seem to be reasonable.

However, we note that the appropriate financial and legal frameworks required, for a meshed offshore grid, also need to be identified and developed, in addition to the technological system operation and system security issues identified in the report.

In addition, a coordinated approach raises further issues that will need to be addressed in phase two of the work, including:

- How to manage the system failure risks of a small number of multi project connection hubs, where failure would potentially have more widespread impacts than the loss of one point to point connection.
- A clearer understanding of the likely size and footprint of onshore multi-terminal hub sites
- A greater clarity around the in-principle approach to onshore connection point site selection, through a clearer understanding of the expected operational network and technological drivers for site selection.
- Greater clarity on the distinction between the location drivers for consolidated cable landing points and the location drivers for connection points to the NGET grid.
- An understanding of the extent to which an offshore network may, or may not, change the siting decisions for individual OWF.

*Q2. Do you have any proposals on how to most effectively bring the technology to market for when needed?*

As set out in our letter early pathfinder projects, facilitated by flexible regulation, appear likely to be effective in supporting this.

*Q3. Do you have any additional evidence to inform the assessment we have made?*

No

Q4. Do you have any further feedback on the report?

The *Leading the Way* scenario used in this report forecasts 27.5GW of OWF installed capacity offshore wind power in the Eastern Regions by 2050. This far exceeds the ambition set within the remaining five regions identified, it reflects the importance of the Southern North Sea for fixed foundation offshore wind.

Delivering one or more High Voltage DC multi-terminal sites in such a scenario would be very demanding, in terms of footprint both on and offshore. Finding a suitable site large enough to accommodate an onshore multi-terminal hub, as well as a location to bring new cable infrastructure onshore at this scale, is an unavoidable and significant challenge.

## Cost-benefit Analysis Report

Q1. Do you agree with our assessment of the costs and benefits?

No comment

Q2. Do you have any other evidence to support or challenge the assessment made?

No

Q3. What do you see as the potential impact on the environment of these proposals, particularly the reduction in the number of assets and landing points?

Overall, the reduction in landing/ onshore connection points and offshore infrastructure can be expected to provide significant benefits. However, a considerable amount of new infrastructure, both on and offshore, will be required to connect the number of generation assets expected. Therefore, significant though more focused impacts, both on and offshore, can be expected.

These impacts will need to be mitigated and compensated for appropriately, and this will incur costs to projects, that should be recognised in the CBA.

Q4. Do you have any further evidence on the potential social and community impacts of these proposals? We would particularly welcome responses from local authorities on this question.

The focusing of onshore development in key strategic locations, which will likely be shaped by the legacy infrastructure of the onshore grid, will be particularly challenging, notwithstanding significant coordination of offshore connections.

A revised approach to the identification, development and ongoing management and expansion of these sites will be essential. As is an opportunity for communities and environmental stakeholders, in these locations to engage effectively with promoters, as these sites continue to develop out to 2050. Developers, OFTOs and statutory undertakers will *all* need to be prepared to invest considerable time and effort in ongoing engagement with the communities around these sites.

Furthermore, they will all need to contribute effectively to building social permission for the transformation of the energy system.<sup>5</sup> This will need to become a key plank of their Environmental and Social Governance, in their relationships with communities, in a way that is not the case at present. To achieve this, projects will, singly and in combination, need to deliver social value, as set out in a recent report for the Institution of Civil Engineers<sup>6</sup>

Q5. Where do you see value for further work to build on and test these findings? Either from the proposed list or beyond?

No comment

A minor aspect, which that needs to be corrected during the development of the Cost-Benefit Analysis is that East Suffolk Council did respond to the consultation, but this is not set out in the summary of social impacts and Appendix A.

## Offshore Connections Review Report

Q1. Do you think that if the areas we are highlighting were improved, that the ability to coordinate projects would be significantly increased?

The proposed modifications of the CION, in both the short and long term, are likely to offer significant benefits for coordination.

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<sup>5</sup> p60 - <https://www.regen.co.uk/download/local-leadership-to-transform-our-energy-system/>

<sup>6</sup> <https://usefulprojects.co.uk/project/maximising-social-value-of-infrastructure/>

However, we still consider that other modifications to the process are required to ensure the natural environment impacts of individual or bundled connection offers, are reasonably assessed at the plan level, as they currently are for offshore development and cable leases.

Given the focus on fewer larger sites, and therefore the consequent environmental impact of a smaller number of large connection points, both on an offshore, the effective plan level assessment of environmental effects, is likely to be essential.

*Q2. Do you think we have missed anything in our offshore connections review that would add value and increase coordination?*

As set out in our letter changes to the CION process must be supported by wider regulatory change, in both the short and long term, to maximise the extent and benefits of offshore coordination.





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Rt Hon Kwasi Kwarteng MP

Minister for Business, Energy and Clean  
Growth

BEIS 1 Victoria St, Westminster, London  
SW1H 0ET

Your Ref:  
Our Ref:  
Date: 4<sup>th</sup> December 2020

**BY EMAIL**

CC. The Rt Hon. Thérèse Coffey MP  
The Rt Hon. the Lord Deben  
James Cartlidge MP

Dear Rt Hon Kwasi Kwarteng MP,

We appreciate the time you have taken previously to meet with us, and the Rt Hon Therese Coffey MP, on 16 October 2019 and 5 February 2020 and your support and engagement since then, including most recently your letter to us of 5<sup>th</sup> August this year discussing in more detail the terms of reference of the Offshore Transmission Network Review (OTNR).

We look forward to understanding more about the outcomes of the first phase of the review, with the publication on 16<sup>th</sup> December of the NGENSO phase one outputs, and the BEIS OTNR seminar on 17<sup>th</sup> December. We appreciate the substantial progress that has been made on the issue of coordinated connections, and the very considerable efforts you have made to drive this matter forward.

We are writing to you now in support of the recent call, by MP's in Norfolk and Suffolk, to ensure that the full potential to coordinate and minimise, the extent of offshore connections is realised.

We fully support their suggestion, in the adjournment debate of 5<sup>th</sup> November, and elsewhere<sup>1</sup>, for relevant proposals to be included in the next Queen's Speech. We ask that all possible measures are fully explored to enable the earliest roll out of the coordination of offshore wind and interconnector projects. It appears that this will be particularly important given, the Crown Estate's expectation, that many of the Round Four offshore wind projects will connect to the Grid before the end of the decade<sup>2</sup>.

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<sup>1</sup> <https://www.jamescartlidge.com/campaigns/reforming-offshore-wind>

<sup>2</sup> <https://www.thecrownestate.co.uk/en-gb/media-and-insights/news/the-crown-estate-updates-timings-for-final-tender-stage-of-offshore-wind-leasing-round-4/>

We believe that effective and rapid deployment of coordinated connections, supported by the necessary legislative and regulatory change, offers significant benefits. Substantive pathfinder projects would secure a more optimal and coordinated offshore network, and facilitate the best possible outcomes for integration, that is, the 60-70% reduction in infrastructure identified by NGENO by 2050, rather than their projected median outcome, of a 50% reduction by that date. In addition, an assertive approach to enabling coordinated offshore connections would also provide for:

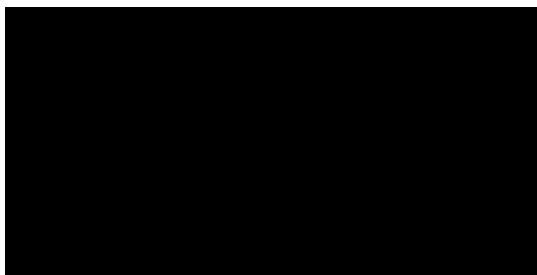
A clear regulatory signal to drive the development of the necessary innovation, in modified supply chains, financing, and commercial structures, that will be needed to deliver offshore meshed grids. This would be a significant benefit to the UK's competitive position for the delivery of offshore HVDC grids, both in the UK, and overseas. It would also accelerate the development of supply chains and the necessary supporting skills at the local level.

The testing of new technologies, and new ways of working in pathfinder projects would both, build developer confidence, and reduce potential regulatory and investment uncertainty. The learning from this process would inform the development of the new enduring regime for offshore connections, to be implemented after 2030.

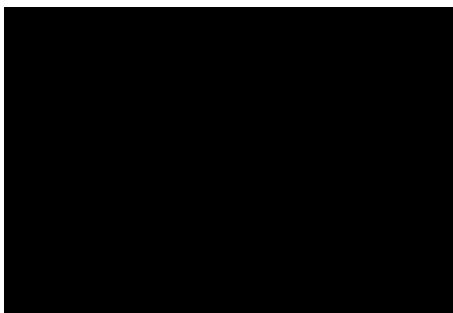
In summary, we believe that the development of coordinated connections could and should, be an opportunity for the UK to further bolster its position in the offshore energy sector. That an assertive and positive approach would be consistent with the Ten Point Plan, the National Infrastructure Strategy, and the overarching goal of achieving Net Zero in the UK by 2050.

We would like to take this opportunity to thank you again, and your officials, for continuing to engage with us on these issues, and for the substantial progress that has been made so far. We look forward to understanding more about the next stages of this work, later in the month.

Yours sincerely



Richard Rout  
Cabinet Member for Environment &  
Public Protection



Craig Rivett  
Deputy Leader and Cabinet Member for Economic  
Development  
East Suffolk Council