

SPR EA1N and EA2 PROJECTS



DEADLINE 5 – POST HEARING SUBMISSIONS (ISH5)

Interested Party: SASES

IP Reference Nos. 20024106 and 20024110

Date: 3 February 2020

Issue: 1

INTRODUCTION

1. These submissions are made following Issue Specific Hearing 5 which took place on Thursday, 21 January 2021.

EA1 COMPARISON

2. At the end of the hearing the applicants drew a comparison with EA1 and that it demonstrated Scottish Power's/their credentials as a developer. There was not an opportunity to respond to this submission but the Examining Authorities made an invitation to put in written submissions on this topic.
3. In fact:
 - a. there are clear differences between the Bramford substations site used for EA1 and the proposed Friston site. It is the failure to understand these fundamental differences which has led to these applications being so flawed.
 - b. the impression that EA1 development was a success is not the case given what happened with the cable route and downsizing of generation capacity
 - c. the EA1 DCO (and the change process) was ineffective as it did not prevent the downsizing in generation capacity or the reduction in capacity of the cable route.
4. For example unlike Friston:
 - a. Bramford was an existing substation site so EA1 was a brownfield development with an existing National Grid connection hub not a greenfield development in a rural area which requires a new National Grid connection hub
 - b. the nearest residential receptors at Bramford are 600m away (Friston 250m) and the Bramford site is not adjacent to a rural village
 - c. Bramford does not have a flood risk
 - d. Bramford is not closely ringed by listed buildings
 - e. Relative to Friston, Bramford is easily accessible by road
 - f. Bramford is not in an area where tourism is a key part of the local economy
5. As to EA1 being a successful project, manifestly this is not the case given:

- a. the cable route can only carry 2.1GW of power whereas Is was originally planned to carry 3.6MW and with the approach taken with EA3 (a 1.4GW project) it could have carried at least 7.2GW;
 - b. instead of being a 1.2GW project, EA1 turned out to be a 714 MW project with no material reduction in environmental impacts
 - c. the excess amounts of land which were acquired by both National Grid and Scottish Power at the Bramford substations site which is not being productively used.
6. The EA1 DCO and the associated change process was ineffective in preventing the serious consequences set out above. Had it been effective the proposal for Friston as a site for the EA1N and EA2 substations and a new National Grid connection hub would not have been brought forward with all the delay and cost that has involved to date and the unnecessary onshore environmental damage that will be caused from landfall on a fragile coastline, from a cable route through an AONB and from substation development at Friston, if these projects are consented.

AGENDA ITEM 3 – ONSHORE SOCIAL AND ECONOMIC EFFECTS

AGENDA ITEM 3(a)

Introduction

7. Whilst many communication professionals acting behalf of the energy sector are busy at work in promoting the economic benefits local, regional and national of offshore wind, even very limited analysis shows that the numbers are not very impressive particularly in the context of the very large investment which each windfarm represents. For example EA1 was a £2 .5 billion project.
8. This submission focuses primarily on local issues. But there are many issues at a national level where UK businesses are not getting their fair share of the investment of in these projects. High value procurement contracts are going to overseas companies, often in areas where cheap labour is available. This is a particular issue when one considers that part of the financial model for these windfarms is a taxpayer funded subsidy provided through the contract for difference regime.

Use of Numbers

9. Great care needs to be taken with numbers which are quoted and the conflating of national, regional and local benefits which is further confused by different definitions of regional. In particular is regional:
- a. Suffolk;
 - b. Norfolk and Suffolk
 - c. East Anglia (meaning Norfolk Suffolk and Cambridgeshire)
 - d. East of England (Norfolk, Suffolk, Essex, Cambridgeshire, Hertfordshire and Bedfordshire) or

- e. yet a broader definition which includes areas further north on the east coast of England?
10. Where expenditure is quoted is this a one off or an annual amount? If numbers are quoted is this an annual basis or over a longer period?
 11. Where contracts are awarded to a business in a particular area what is the size of that business? Will the work be carried out in that area by individuals who live in that area? Is the contract for a one off piece of work or a long term contract over a period of years?
 12. Where investment is made in infrastructure, is that to serve the single project for which it is quoted or will it serve many projects?
 13. By the way example of the care that needs to be taken with benefits quoted by developers the map below (taken from the autumn winter 2020/2021 addition of East Angle the newsletter published by Scottish Power) shows how local businesses have purportedly benefited from the EA1 project. It raises a number of questions. Were these supply contracts simply for construction or long-term contracts which will provide long-term employment. What was the nature of any jobs created, are their skilled jobs? Most importantly what was the value of these contracts and were they performed by people who live in the area where the business is based. Obviously the value of individual contracts cannot be disclosed but it ought to be possible disclose an overall value. A healthy degree of scepticism needs to be used when looking at charts like this. Looking at the companies in the Lowestoft area, the first company in this list is Eastern Edge which is referred to as a “consultancy”. From a simple search of Companies House it turns out this is a one-person business where the only employee does not live in Suffolk let alone Lowestoft. Further it is notable that the area that is going to suffer all the environmental impacts of the onshore infrastructure and whose tourism economy is at risk seems to be receiving little or no supply chain benefits.



14. Accordingly when assessing economic benefits greater analysis than that provided by the applicants so far needs to be provided.

The Skills Agenda

15. This is one of the most important if not the most important issue particularly for young people. The Applicants have quoted various numbers in support of their efforts in this area following the grant of the DCO for the EA1 windfarm. Consent for this windfarm was granted in 2014, six years ago.
16. A Scottish Power has an “apprenticeship program”. After six years only two apprentices have been employed, one of those being from Lowestoft and one from Norwich. In the hearing the applicants referred to the fact that Siemens Gamesa had employed six apprentices. However what was not made clear is where those apprentices were recruited from, whether they are based in Lowestoft or elsewhere, are they exclusively working on Scottish Power projects and if so how many Scottish Power projects they are working on. In the absence of that detail it is impossible to assess what are the benefits that are truly been delivered by these projects
17. Scottish Power and other developers are working with schools and holding STEM inspiration workshops. The numbers quoted were 3000 young people. As a round number that might be regarded as significant. However when it is spread over a number of years and judged as a percentage of the school population in Suffolk and Norfolk it is unimpressive.
18. Given EA1 was consented six years ago, as a percentage of the Suffolk school population this is $\frac{1}{2}$ of one percent of that population a year. If you take the Suffolk and Norfolk school population combined (around 220,000 pupils) this represents approximately $\frac{1}{4}$ of 1%. Given the vital need to engage young people at an early age in science and engineering these numbers demonstrate that Scottish Power and the wind sector are not looking to make a transformational change.
19. There was a reference to a Masters programme to the value of around £200,000. It was not clear over what period this level investment would be made, is it a one off or is it for example over a five-year period at £40,000 a year. Aside from the value of this program the question is how many students will it provide a Masters scholarship for? Is it 20 at £10,000 a year or 10 at £20,000 a year. Are the graduates involved local or from the region however defined? If Scottish Power and the sector was serious about developing graduate skills it should endow a long-term fund to provide scholarships not just for graduates but also for undergraduates, young people from low income families who could be encouraged into science and engineering by the provision of full or partial grants.
20. Fundamentally there is a real lack of ambition when it comes to the skills agenda and in reality nothing material to offset the risks to the local tourism economy and the long-term damage to the environment and people’s wellbeing – see further below.

The MOU Approach

21. There has been significant debate about the applicants' and the local authorities' preference for entering into a Memorandum of Understanding which is not even proposed to be a requirement under the draft development consent order. There has to be a concern of whether this approach is appropriate given the limited benefits delivered so far as set out above.
22. Given the obligations under the MOU are non-binding and unspecified and given that it will not be a requirement of the DCO, there is no benefit from the MOU which can be taken into account in deciding whether to recommend or not the grant of the DCO.

AGENDA ITEM 3(b) & (c)

23. It is established that there are limited local jobs available during construction (not that there is a readily available source of labour locally which is currently unemployed) and no jobs post construction in respect of the onshore infrastructure. Set against this is a very real risk to the tourism economy as set out in the report commissioned by the Destination Management Organisation.
24. These are essentially economic forecasts which rely upon a number of assumptions, which may or may not turn out to be true, and comparisons which may or may not be valid. Nothing that has been presented so far can provide any confidence that the development of the applicants' projects, particularly when taken in combination with the Sizewell C project and the other offshore energy projects which require substantial new infrastructure in the local area, will not damage the tourism economy which is a key part of the local economy. Therefore given the absence of economic benefits coming from the construction of the onshore infrastructure set against the risk of damage to the local tourism economy, the logical conclusion is that these projects will provide no economic benefit and in fact will pose a threat to the tourism economy.
25. A particular point which was also commented on by Tim Rowan Robinson, a former local hotelier, is that workers occupying holiday accommodation (which will therefore not be available to visitors in the peak holiday season) will simply not spend at the same level as visitors and their families who travel to the locality for a holiday. The absence of any such analysis particularly in the context of such a detrimental impact on the availability of holiday accommodation is a serious flaw in the applicants' analysis.
26. This agenda item included a reference to land use. SASES has made written representations on this subject at Deadline 1¹. In the context of cumulative impact there was the potential for a major loss of agricultural land due to the building of this infrastructure in rural areas on greenfield site utilising the best and most versatile agricultural land. This reflects a general lack of understanding that the onshore land requirements of offshore generated wind are very substantial and there is an absence of strategic land planning.

¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010077/EN010077-002513-DL1%20-%20SASES%20WR%20land%20use.pdf>

AGENDA ITEM 3(d)

27. Much has been said and written in relation to construction, noise, damage to landscape and heritage, damage to the footpath network and road congestion which will inevitably seriously affect this part of rural Suffolk and its tranquillity which is a draw both for long terms residents and visitors alike.