



Offshore Wind Farms

EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

EAST ANGLIA TWO

PINS Ref: EN010078

**OFH6 - The Planning Balance -
Response to Action Point 6
Deadline 5 – 3 February 2021**

by

SEAS (Suffolk Energy Action Solutions)

Unique Ref. No. EA1(N): 2002 4494

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ISH6 Action Point 3

OFH6 - The Planning Balance Response to Action Point 6 Deadline 5 – 3 February 2021

SEAS Response to Hearing Action Point 2, The Planning Balance, Open Floor Hearings 6 (OFHs6)

A. INTRODUCTION

1. Action 1 for OFHs 1 [see Note B] asks participants in that hearing for an explanation of their oral submissions that the proposed developments would result in adverse impacts which would outweigh the benefits of the applications, with reference to the provisions of s104(7) of the Planning Act 2008. Could speakers in this hearing please do the same in writing, making reference where necessary to any justification for an approach in which the offshore works might be recommended for consent but the onshore works might not – a ‘split decision’.
2. We refer to documents relevant to this question.
 - (a) Integrated Offshore Transmission Project (East), Final Report Conclusions and Recommendations, August 2015
 - (b) Energy White Paper, Powering our Net Zero Future, December 2020
 - (c) Offshore Coordination Phase 1 Final Report, (OCP Report) 16 December 2020

This leads us to propose that the DCO be split between offshore and onshore elements. This will mean that no time is wasted in respect of construction of the offshore turbines. The application should however be rejected in relation to the onshore works. This will enable a full consideration of better locations for this infrastructure where the adverse impacts are minimised.

3. Our case, from the very outset, has been that the adverse impacts of this particular onshore site location substantially outweigh the benefits of the application when taken as a whole.

4. We do not challenge the offshore location or construction of EA1N or EA2. We do challenge the onshore location of infrastructure. It is clear that there are more appropriate alternative sites which better concur with government policy.
5. This has been brought into urgent sharp focus by the publication of the Energy White Paper which states: "To minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid" (page 80).
6. In the course of these Examinations compelling and comprehensive evidence has been adduced demonstrating the severe adverse effects of the application for residents, the environment, tourism and for general health and well-being.
7. A short summary of the adverse impacts is detailed below. This should be read in the context of the more detailed evidence-based Issue Specific submissions as submitted by SEAS, SASES, Natural England and others.

B. ADVERSE IMPACTS OF THIS ONSHORE SITE LOCATION OUTWEIGH THE BENEFITS

(i) Indefensible impact on biodiversity

"We will safeguard our cherished landscapes, restore habitats for wildlife in order to combat biodiversity loss and adapt to climate change, all whilst creating green jobs".

8. These words in the Energy White Paper stand in stark contrast to the devastation inflicted if the current onshore plans for EA1N and EA2 are consented.
9. Any onshore substation and cable corridor will have an adverse impact on biodiversity but the current plans to connect EA1N and EA2 to the Grid are excessively destructive, gouging 9 km inland through the Thorpeness Cliffs, Suffolk Coastal Path, the Suffolk Sandlings and an Area of Outstanding Natural

Beauty to arrive at the substation site of Friston in the midst of untouched countryside.

10. If consented, this destruction will be replicated and exacerbated for Nautilus, Eurolink, Galloper Extension, Greater Gabbard Extension, SDC1 and SDC2. This could result in eight expansions to the cable trenches.
11. There is a real and tangible risk of further destabilisation at Thorpeness Cliffs as a consequence of drilling. In addition, the fragile Coralline Crag is threatened from subsea cable work.
12. **This degree of damage to an environmentally sensitive, diverse and legally protected landscape brimming with biodiversity, is unmitigable, unacceptable and given the availability of better alternative brownfield sites either on the coast or using existing cable routes, indefensible.**
13. Given that there are less environmentally harmful onshore solutions available, the onshore works, as they stand, should not be consented.
 - (ii) **Indefensible impact on coastal communities**
"We recognise the impact this is having on the coastal communities which host this infrastructure and will ACT QUICKLY to take the necessary steps to address the situation This will consider the full impacts on affected communities, particularly on the east coast of England ..." - The Energy White Paper.
14. As we have heard from an overwhelming number of residents, who have courageously and passionately spoken at the Open Floor Hearings, the impact of these Applications upon their community is simply too great.
15. People have chosen to live in the midst of countryside free from the noise, lights and sites of an industrialised landscape. With the information currently available the huge substation site of Friston and the cable trenches will be in a

permanent state of construction for the next 12-15 years, quite possibly longer if we factor in the next round of projects and decommissioning.

16. The substation site and cable corridors are at various points no more than 30m from gardens, a Parish Church, a medieval village, a primary school and a care home. The quintessential, rural character of Friston village will be torn asunder. Pilgrims paths-will be desecrated.

17. This is not a mitigable or legitimate sacrifice.

18. It is unconscionable to put down a substation in the heart of a medieval village, where noise, lights and industrial structures destroy well-being and mental health, if better site options exist.

19. There are more suitable locations at semi-industrialised or brownfield sites, where any unmitigable noise pollution, light pollution and air pollution, although present, will not impact on a local community, school children, the elderly and perhaps most importantly the mental health of all who live within metres of this site or who will have their land forcibly acquired. The adverse impacts of the proposed cable route and substations clearly outweigh the benefits, when less damaging alternatives are available.

(iii) Adverse impact upon roads, traffic and emergency services

20. The local road system is a mix of narrow country lanes with a few arterial A roads which barely accommodate the peak season traffic, in particular during holidays and festivals.

21. These roads are bumper to bumper at peak times. They are already dangerous for cyclists and ramblers.

22. Any additional, heavy construction traffic will be the tipping-point for locals and visitors who have come to enjoy the tranquil haven and easy access of coastal Suffolk.
23. With gridlocked traffic, emergency services will fail to reach their destinations in time.
24. Unlike other coastal destinations such as North Norfolk, and thanks to the abundance of river estuaries across the Orford, Aldeburgh, Southwold region, there is no radial coastal road along the Suffolk Heritage Coast. The A1094 to Aldeburgh is therefore a crucial arterial road for the two main commercial sectors in this district, Tourism and Farming.
25. Friston itself is over four miles from the A12 along narrow, winding, lanes.
26. There is a real likelihood that the cumulative impact of multiple energy projects will be too great a burden on the road system.

(iv) Economic impact

27. Offshore wind will undoubtedly bring a positive national and regional economic impact and we welcome the regeneration possibilities for Lowestoft as a centre for the renewables industry. However, as SPR's latest Newsletter shows, EA1 has brought NO jobs to the local area.
28. At a micro level, around Friston and the surrounding villages, research commissioned by the [Suffolk Coast Destination Management Organisation \(DMO\)](#), suggests that new energy projects on the Suffolk coastline could impact the local tourist economy by up to £40 million per annum.
29. This is a devastating and unacceptable loss of income in an area with limited business opportunity. Unacceptable because it is needless. **The destruction of swathes of unspoilt countryside which in turn will destroy a significant proportion of the nature-based tourism sector would not occur if the**

onshore substation complex was taken to a semi-industrialised or brownfield site using existing cable corridors. The economic adverse impacts on the local communities far outweigh any benefit. The inevitable commoditisation of the region will impoverish the quality of life for all affected communities.

C. GOVERNMENT POLICY AND THE JUSTIFICATION FOR A 'SPLIT DECISION'

(i) EA1N and EA2 can and should benefit from early integration

30. It is clear from Issue Specific Hearing (ISH) 4 that there is still a question mark over which and exactly when projects are considered to be at a stage of 'development' and thus might benefit from "*early opportunities for coordination*" and be considered pathfinder projects.

31. We agree with the view of Suffolk County Council as expressed at ISH 4: "*We are not at the stage that this project is in development in a physical sense, [in] that works are already underway. We are at the pre consent stage. And we are at a stage where the project is still itself being changed by the Applicant, where it sees that there is a justification for change...* "

32. As page 4 of the OCP Phase One Final report says, "*Adopting an integrated approach for all offshore projects to be delivered from 2025 has the potential to save consumers approximately £6 billion, or 18% in capital and operating expenditure between now and 2050*". Importantly, footnote 5 states, "***This means applying an integrated approach to all offshore projects that have not yet received consent***". Therefore, EA1N and EA2 **have not been excluded** from consideration from integration

33. The onshore aspects of these projects should be rejected to enable full consideration of an integrated approach offshore, **in line with current**

government policy. This will enable the adverse impacts of onshore solutions to be minimised.

(ii) The appropriate balance between environmental, social and economic costs.

*“To ensure that the transmission connections for offshore wind generation are delivered in the most appropriate way, considering the increased ambition for offshore wind to achieve net zero. **This will be done with a view to finding the appropriate balance between environmental, social and economic costs.**”* - BEIS Review Objective

34. As set out clearly and unequivocally in the OCP Report, the early adoption of the Offshore Transmission Network by commencing integration in 2025 will be universally positive in terms of cost, climate and for consumers. Moreover, it chimes with the government’s ambitions with regard to the BEIS Review and Energy White Paper.

35. In light of the government’s commitment to “ensuring an appropriate balance between economic, social and environmental costs,” it is nonsense for companies such as SPR to claim commercial consideration as being the overriding issue for their projects’ exclusion from being “Pathfinders” and deny consideration for connection to the OTN, starting in 2025.

36. SPR’s blanket resistance to engage with Pathfinder Projects reflects an unalloyed placing of profit above all else. There is no sensible or acceptable reason why SPR should not be included in the Pathfinders’ Workstream Offshore Transmission Network Review.

37. In consideration of the government’s commitment to both coastal communities and the decarbonisation targets, enshrined in the Energy White Paper, the commercial considerations for this project have been damagingly overstated. The onshore aspect of these projects must be rejected to address

the balance between the commercial interests of a for profit company and the economic and environmental impacts on our community.

(iii) Negative Carbon Impact of Onshore Radial Infrastructure

38. The Carbon Cycle Analysis (CCA) of these projects has not been properly considered in the Examination or Planning Balance. That is, the only comparison made is how much climate impact a wind turbine have per megawatts of generation would have. relative to a fossil fuel turbine per megawatts of generation.

39. The comparison is geared towards renewable energy's contribution towards climate change but fails to provide the full picture of climate change impacts.

40. The construction of any onshore transmission system such as the production of concrete for industrial buildings, the smelting of copper and other metals for cables and the production of plastics for insulation and ducting etc., will release considerable amounts of carbon gases contributing to the very climate change the government is committed to stopping. The important factor is the extent of the damage which is greater than necessary. As the OCP Report states, *"There are also significant environmental and social benefits with an integrated approach, as the number of new electricity infrastructure assets, including cables and onshore landing points, could be reduced by around 50 per cent."* A reduction of 50%, or even some significantly lesser figure, would have a massive effect upon the overall climate impact.

41. In the case of EA1N and EA2, where the cable routes and substation site eat into agriculture land and large areas of carbon absorbing plant life (the Sandlings, the Suffolk AONB, the SSSI, the redesignated 'protected habitats' at the River Hundred and the wetlands, heathlands and meadows along the cable route to Friston) emissions will further be increased.

42. The proposed onshore developments within these Applications, would result in unnecessary carbon emissions. Only if the onshore infrastructure minimised the destruction of plant life by connecting to the grid at a brownfield site could these projects contribute positively to climate change and support the government's stated intent in this regard.

43. The onshore aspects of these projects should therefore not be consented.

(iv) The Benefits of Offshore Integration far outweigh any benefit of the Radial Transmission System

44. The argument of the former Secretary of State (SoS), Mr Alok Sharma, for consenting the Norfolk Vanguard project was that, in his opinion, the benefits outweighed the negative impacts in the planning balance. The argument is therefore the same for "Offshore Integrated Transmission" versus "Onshore Radial transmission". **The benefits of the Offshore Transmission Network far outweigh any benefit gained from continuing with any radial transmission system in the planning balance.**

45. An Offshore Transmission Network will cost less, be more efficient and deliver energy where it is needed, and all of these aspects concur with the current position contained in the NPSs.

46. The findings of the Integrated Offshore Transmission Project (East) 2015 Report concluded that an integrated offshore solution was in the interests of the UK as a whole.

47. On 6 November 2020, in response to Mr Duncan Baker's adjournment debate, the then Energy Minister, and now the newly appointed [SoS BEIS, Mr Kwarteng, made a very encouraging response](#) and said, amongst other things:

- The offshore wind industry had evolved since 2015;
- There was a shift in the industry towards integration.

- Point to point transmission was recognised as having severe detrimental impacts onshore
- Technology was available to build an offshore integrated network
- Industry was engaged through the OTNR
- The argument for some form of offshore network has been won

48. With this in mind it is illogical for further radial connections to the grid to be approved. The acutely detrimental impacts of radial connections must now be properly recognised in the Planning Balance.

(v) The technology is available

49. The Integrated Offshore Transmission Project (East) 2015 Report, concluded that there are “no major technical barriers that will definitely prohibit the development of integrated offshore networks to facilitate the connection of offshore wind generation”.

50. As Elia, the Belgian transmission system operator confirmed to SEAS in 2020, the technological solutions are ready and available now. It is already regarded by other North Sea countries as the “industry standard approach”.

51. New HVDC technology, which would facilitate an integrated offshore network, is very much in the public domain. Despite SPR’s assertions to the contrary, we are certain that there are no significant technological barriers to integration.

(vi) A ‘split decision’ DCO: a precedent has been set

52. The SoS BEIS has the power to approve wind farm applications without approving any radial transmission system or site location.

53. There is a notable precedent. The well documented case study is Triton Knoll, where the offshore consent was granted in 2013 and amended to allow onshore connection in 2016.

(vii) A better alternative, environmentally, economically and socially

54. A single Hub site for the substations and inter-connectors should be chosen as part of a strategic assessment which takes into account future needs and where the power is actually required.

55. There are a number of different alternatives.

- Bramford might be the best site for a small cluster of four wind farms. This was originally the designated site.
- Bradwell, as Dr Therese Coffey, our local MP, has consistently proposed.
- A larger Hub could be selected taking into account the proximity to London and to the Kent connections for export to other North Sea countries.
- Grain may become more relevant.

These are all brownfield sites and large enough to accommodate such development.

(viii) There is no risk to the government's 2030 offshore wind farm targets, there is ample time

56. If the DCO is split and the offshore elements are approved, then there needs to be no delay with regard to the construction of the turbines.

57. There are then 9 years to go until the government's 2030 targets. There is time to get this right **without jeopardising the government's offshore wind targets.**



58. In this way, BEIS can work with NGENSO and Ofgem to establish a new coordinated offshore system and use this as an opportunity to pilot test a more innovative solution using a single brownfield site for connecting at least four wind farms to the grid.
59. ScottishPower and National Grid Ventures could be incentivised to step change to a better design solution with the support of BEIS, since their apparent failure to embrace the opportunity appears to be a question of cost. But ultimately whether government provides incentives or not is irrelevant to the analysis of this Application and to the submissions made in this document.
60. SPR cannot say it is too late to change its plans. The notion that it should be permitted to proceed because it has incurred costs for a planning application is just plain silly. The costs are utterly trivial in context. BEIS announced its Review three months before this DCO process began.
61. We note that SPR, NGENSO and NGET have rustled up out of the blue a “new” timetable which has a completion date of November 2024 for EA2. This is a cynical attempt to accelerate implementation of EA2 by at least three years to reinforce a spurious argument that it is all too late to change anything.

D. CONCLUSION: A CONSTRUCTIVE WAY FORWARD

62. The Planning Act 2008 states: “if there has been a significant change” in the goals for energy generation, this requires a full re-evaluation of the plans to decide if they are still appropriate given that change.
63. Here, we have a White Paper published in December 2020 setting out dramatically increased targets for wind energy generation. It is entirely appropriate for SPR and National Grid to pause, reconsider and come back with better thought through plans. More haste, less speed.



64. SEAS asked for a delay to this Examination at the outset before the Examinations commenced, in order to allow the BEIS Review to publish its initial conclusions prior to the Examination. That delay was not granted. That is no reason why we should not now accept that this is a brave new world, very different to the one of 2017 when these plans were being shaped and even the world of 2019 when there was still no UK wind energy strategy and no wide acceptance of offshore integrated solutions

65. For the sake of our future legacy, to future generations, we appeal to BEIS, to Ofgem, to ScottishPower and National Grid to hear our voices and to take the initiative now to grasp this golden opportunity, to find a better design, and better integrated solutions.

We urge the PINS Examiners to reject part of this DCO and split the offshore plans from the onshore plans. We recommend that the offshore wind farms are given consent but that the ExA does not agree to these needlessly destructive onshore plans.

END