

Re: SPR EA1N and EA2 projects (Deadline 8)

Dated 25 March 2021

Interested party: Anglian Energy Planning Alliance

PINS references 20024098 & 20024099

**Failure to balance environmental and social costs
in accordance with Government
energy and climate change strategy.**

1. In Compulsory Acquisition Hearing 3, Session 4, the Applicant emphasised that in selecting Friston over other potential onshore sites, construction cost was the ultimate determining factor. This included evaluating the comparative length of cable routes and selecting the shortest, rather than the least damaging to the environment and to local communities. Its submission made clear that this emphasis on what it called 'project economics' - i.e. construction cost reduction – over-rode all other considerations, including environmental and social impact.
2. The Applicant asserted that this exclusively cost-driven approach was taken in adherence to what it described as 'the trajectory of Government policy'. In support of this assertion it cited various references (including to cost, competition and CfDs) from the Government's recent Energy White Paper *Powering Our Net Zero Future*.
3. These statements by the Applicant are a serious misrepresentation of the Government's energy and climate change strategy in relation to offshore wind. They must not be allowed to stand as a defence of the Applicant's consistent dismissal and downgrading of environmental and social concerns in its pursuit of lower construction costs.
4. As summarised in the White Paper under the Prime Minister's Ten Point Plan, the UK's energy policy gives as much weight to protecting our natural environment as to generating more power from offshore wind. Nowhere in its 170 pages does it state or imply that reducing the construction cost of wind energy justifies damage to the environment or harm to local communities or economies. The explicit central objective declared in the White Paper is “**a balance between environmental, social and economic costs**” in achieving its energy and climate change goals.
5. There is in fact a relevant 'trajectory' in Government policy, indicated in detail in the White Paper, but it is not the one imagined by the Applicant. It is instead a movement towards reducing the impact of offshore wind upon the

communities and landscapes affected by the construction of onshore infrastructure. The White Paper highlights the Government's intention to **“implement a more efficient approach to connecting offshore generation to the mainland grid”** in order to **“minimise the impact on local communities”**.

It recognises clearly the severity of such impact and also identifies its fundamental cause: namely the successive and cumulative construction of separate cable routes to individual onshore substations and grid connections. It singles out the East coast of England as a priority for avoidance of these severe adverse effects on communities and the environment. It demands that the UK must **“balance new technologies and the need for new infrastructure with protecting the environment”**. The Prime Minister's Ten Point Plan in turn emphasises the need to **“protect our cherished landscapes and combat biodiversity loss”**.

6. Far from being compliant with Government policy, the Applicant has failed to balance the environmental, social and economic costs in making its selection between available sites, cable routes and grid connections. It has instead admitted to basing its choice of Friston and its cable route from Thorpeness entirely on its own requirement to reduce costs for commercial reasons, and on no other considerations.
7. It is open to the Applicant to fulfil its claim to compliance with Government policy by now reviewing and revising its choice of onshore site location, in order properly to balance the 'project economics' against the social, environmental and other local economic costs of its selection.

It is equally open to the Secretary of State to ensure compliance by refusing to grant consent unless an alternative onshore site is selected by a process that ensures this balance.

8. If consent were granted for the onshore infrastructure currently proposed it would not be the last, nor the worst, of the devastating energy projects that already scar the East Anglian countryside. Proposals following on from such consent would include National Grid's Nautilus and Eurolink substations and cable routes, which NG has said will be applied for at or near Friston if the Applicant's DCO is granted. Although the cumulative impact of these and other likely proposals has been ignored by the Applicant, consent to its DCO would set off a further construction avalanche on coast and countryside, in defiance of the Government's environmental strategy.
9. There is still time to avoid this outcome, while ensuring that EA1N and EA2 can provide their welcome contributions to the UK's renewable energy needs. It is only their onshore infrastructure and site selection that needs to be re-planned, in order to achieve genuine accord with the

Government's policy objectives for energy and climate change.