

**Sunnica Energy Farm EN010106**

# **Cllr Richard Rout OFH1 Post-hearing Submission**

## **Deadline 4**

**16 December 2022**

Cllr Richard Rout's speaking notes, delivered at OFH1 on 6 December 2022

### Introduction

- Good evening. I am Councillor Richard Rout, Deputy Leader of Suffolk County Council and cabinet member for finance and environment.
- You will hear from SCC officers and legal representatives on the technical details at Issue Specific Hearings, but I want to thank the Examining Authority for this opportunity to set out SCC's overall approach, what our objectives are in this examination and what our many and varied issues are with this project.
- First, to add some context, I have the political responsibility for overseeing SCC's response to Nationally Significant Infrastructure Projects. It is a responsibility I've held since 2018.
- Over this period, I and the teams I work with, have engaged with and responded to:
  - Sizewell C, one of only two planned new nuclear plants in the UK ;
  - The EA1 North and EA2 windfarms
  - Major interconnectors connecting the UK national grid to the continent at Suffolk;
  - And the Bramford to Twinstead and East Anglia Green pylon runs, which form part of a large number of transmission projects to reinforce the grid as our region becomes one of the greatest exporters of clean energy in the country.
- The County Council has also successfully promoted its own DCO project under the NSIP planning regime to authorise the Lake Lothing Third Crossing at Lowestoft, which is now under construction as the Gull Wing Bridge. The County Council therefore has a good understanding of the responsibilities and pressures on a scheme promoter as well as its experiences as a host authority and regulating authority.
- This experience that we at Suffolk County Council have in dealing with Nationally Significant Infrastructure Projects, I hope gives weight and credibility when I state that both in terms of quality of proposal and engagement from the developer, the proposed Sunnica project is, in my opinion, the poorest application I have dealt with to date. It is not a statement I make

lightly and there remain a number of issues that unless satisfactorily resolved in short order should prevent the Sunnica application from being consented in its current form.

#### Suffolk's context

- We, of course, recognise that Suffolk's geography means it is a very important location for low carbon energy projects, and note that Suffolk hosts a huge proportion of the UK's new low-carbon generation projects:
- SCC has adopted a policy of being supportive in principle to renewable and low-carbon energy generation schemes, while ensuring that the impacts of these schemes are minimised.
- We are behind the national ambition to achieve Net-Zero Carbon for the UK. SCC has declared a climate emergency, and we are fully aware and supportive of the need for new, large-scale, low-carbon electricity generation.
- The national benefits coming with this accumulation of infrastructure are welcome; but by the same token, the combined impacts are acutely concentrated on our local communities and environment. As a rural county with a vibrant economy, strong communities and a rich natural and cultural heritage, the speed and scale of this transformation of our energy infrastructure means that Suffolk County Council's position must be to demand the highest standards of all major projects, including this one, in terms of design, mitigation, and reducing the impact on our communities as best as possible, and where required providing appropriate compensation for residual impacts. Thus far, Sunnica has failed to meet this standard by some distance.

#### SCC's aims

- A comprehensive account of the issues with this scheme has been presented in the joint Local Impact Report, which our Council produced with our partner authorities. I don't propose to go into those specific details now, but I do want to take a few moments to highlight some overarching concerns.
- The first relates to the sheer geographic scale of this proposal. It is not simply an object that sits within the landscape: it entirely transforms the landscape surrounding several villages and does so permanently – I use that word quite deliberately, given the 40-year consent sought by the applicant, which means the transformation will endure for more than a generation. The location is also intensely rural, and valued as such, meaning that there is a heightened need to address all the impacts of the 24 month construction period. The expectation must be for an exemplary approach to mitigation and avoidance of impacts, on the environment, the community, the economy and our infrastructure.
- For this application, this does not appear to be the case, and worryingly, the low quality of the submission means it is difficult to have confidence that the applicant has a full understanding of the impacts. So, in some more detail:
  - Some assessments of impacts have serious shortcomings in terms of both evidence and methodology, meaning that they can't provide useful conclusions on impacts.
  - The presentation of the documentation makes it difficult to get to grips with what the proposal and its impacts are; including how it will be experienced and felt by people who live near it.
  - Mitigation proposals do not appear to be tailored to the local context, and sometimes lack, or certainly are particularly ambitious, in scope or scale.

- These issues could and should have been addressed through better engagement with and more careful listening and responding to concerns raised by our well-informed local communities and the local authorities. The pre-application phase of this project was a huge missed opportunity to build greater consent and buy-in through careful communication and in-depth collaboration on and amendments to these proposals. This is highly disappointing and frustrating and is a poor reflection on Sunnica's approach to the entire proposal.

### Conclusion

- I will end more positively by saying that there has been progress at times, particularly very recently: Where the applicant's team has been able to discuss issues in more detail such as on-site visits or in technical workshops, my feeling is that all sides have come away with a somewhat better understanding of the project and ideas for how to take this forward. It is deeply frustrating that this kind of progress is only now being made at this stage of a planning process which is supposed to be front-loaded and my concern is that there are real risks it comes too late to markedly improve the proposal.
- However, I have to repeat and stress the overall position of this, and the other, Councils, which was set out in the Local Impact Report and remains very much at the front of Suffolk County Council's mind. I quote from the Local Impact Report, paragraph 1.1:

*"Overall, the position of the Councils is that there are a number of issues with the Sunnica proposal that, to greater or lesser degree, should prevent the project from being consented in its current form despite the desirability of low carbon sources of energy generation. "*

- To conclude, there remains a very great deal of work to be done and potentially further change requests to be proposed by the applicant before this proposal can be considered anywhere near acceptable, and not a great deal of time in which to achieve it.
- Thank you for your time.