



Greg Clark MP
Secretary of State for Business, Energy
and Industrial Strategy
House of Commons
London
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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 18th 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
Leader
Waveney District Council