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Your ref: EN020027
Our ref: EA Green Scoping
Date: 5 December 2022
Please ask for: Naomi Goold
Customer Services: 03330 162 000
Direct dial: 01394 444535
Email: Naomi.Goold@eastsoffolk.gov.uk

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by National Grid Electricity Transmission (NGET) (the Applicant) for an Order granting Development Consent for the East Anglia Green Energy Enablement (GREEN) (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

East Suffolk Council (ESC) welcomes the opportunity to comment on the East Anglia GREEN Scoping Report dated 7 November 2022. This letter comprises ESC's response under Section 43(1) of the Planning Act 2008.

ESC is not a host authority but is a direct neighbouring authority of the scoping area. ESC considers that the host authorities and County Councils along the proposed route are best placed to provide comments on detailed technical matters within their geographical jurisdictions. For this reason, ESC has limited comments to the consideration of offshore alternatives, cumulative impacts, socio-economic, recreation, and tourism impacts.

Offshore Alternatives

ESC recognises that the East Anglia GREEN project is as presented within the Scoping Report and associated material, but it is noted that at 3.3.9 of the Scoping Report, National Grid provided further clarification on the potential for a feasible offshore strategic option to deliver the additional transmission capacity required. This was provided in response to questions about

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offshore alternatives raised in non-statutory consultation responses earlier this year and by the Offshore Electricity Grid Task Force (OffSET).

The further clarification provided by National Grid details why the offshore strategic option is not being progressed, but notes conclusions should not be seen as final. The project webpage (under Frequently Asked Questions) notes not only would an offshore solution of equivalent capacity require three subsea connections and associated onshore infrastructure, but it would also require onshore infrastructure from Bramford to the coast and Norwich to the coast.

ESC supports proper consideration of alternatives to the current proposal, but if alternatives to the current proposal necessitate additional onshore infrastructure in East Suffolk, this would not be supported by ESC.

Cumulative Impact

ESC wishes to highlight that the East Anglia GREEN project is one of several Nationally Significant Infrastructure Projects (NSIPs) currently proposed, or recently consented but not yet constructed, within Suffolk. It is therefore essential that the project is not considered in isolation and that the full cumulative effects of East Anglia GREEN with other projects and proposals is adequately and appropriately assessed, mitigated, and where appropriate compensated.

ESC continues to promote the need for a coordinated solution to deliver the renewable and low carbon generation and associated transmission infrastructure needed to meet Net Zero and decarbonisation targets. This is essential to minimise the extent and scale of the impacts of onshore infrastructure, particularly in East Suffolk. This remains our position. ESC would therefore not be supportive of an alternative solution which would cause significant additional onshore infrastructure within East Suffolk, such as the alternative subsea solution described above.

Section 17.3 of the Scoping Report identifies the methodology for assessing inter-project cumulative effects, including NSIPs. The methodology for identifying NSIPs at 17.3.4 notes the Planning Inspectorate's Programme of Projects will be used.

The long list of projects is not included within the Scoping Report, and ESC would like to note that while most NSIP projects currently in planning do have project pages on the Planning Inspectorate's website, there are exceptions. For example, the EuroLink project does not yet have a project page, although a non-statutory consultation on siting and routing options for the project is currently taking place. ESC would expect to see this project included in the list of NSIPs considered for cumulative assessment.

Table 17.1 identifies the Zone of Influence (ZOI) for a number of the topic areas, it is however noted that socio-economics, recreation, and tourism is not included. It is essential that the ZOI for this topic matter is not too narrowly defined and extends beyond that identified at 15.3.1, further comments have been provided on this matter in the section below.

Socio-Economics, Recreation, and Tourism

The study area for socio-economics, recreation, and tourism as set out at 15.3.1 is divided into two spatial scales; the Local and Wider study areas. The Local study area comprises the scoping report corridor and will be refined to become the Order Limits within the Environmental Statement, and the Wider study area covers the local authority spatial areas that the scoping report corridor passes through.

While ESC is not included in either study area, the Council is concerned about the project's potential cumulative impact on tourism when combined with other NSIPs. The construction period for the East Anglia GREEN project if consented likely overlaps with that of several other high profile NSIPs in Suffolk. Visitors/residents may be unaware or unable to distinguish between areas of Suffolk hosting the individual projects, and therefore may perceive the separate projects as one large project, particularly where there is temporal and/or spatial overlap between projects. This may subsequently affect perception and propensity for people to visit the area.

ESC would like to ensure that the impact of the project is not evaluated solely within the boundary limits nor in isolation from the wider district, particularly given the multiple consented and emerging NSIP projects in both East Suffolk and the wider district, and the likely temporal overlap between this project and other NSIPs.

The visitor economy is one of largest economic sectors in east Suffolk and provides a good illustration of how the impact of the scheme extends beyond the boundary limits. There is a high degree of interdependency between visitor destinations, employment, and supply chains within Suffolk. ESC is concerned that disruption to the visitor experience will have a consequential impact on the perception of Suffolk as a holiday and visitor destination and therefore negatively affect the visitor economy throughout the lifetime of the project. Full consideration of this impact needs to be included within the assessment of the potential effects on tourism during the construction phase.

If you would like to discuss any of the comments made in this response further, please do not hesitate to contact ESC using the above contact details.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Philip Ridley', with a long, sweeping underline.

Philip Ridley BSc (Hons) MRTPI
Head of Planning and Coastal Management
East Suffolk Council