



Rt Hon Claire Coutinho MP
Secretary of State for Energy Security and
Net Zero

Your ref:
Date: 20 October 2023
Please ask for: Naomi Goold
Customer Services: 03330 162 000
Direct dial: 01394 444535
Email: naomi.goold@eastsuffolk.gov.uk

Dear Rt Hon Claire Coutinho MP,

East Suffolk Council's concerns regarding the cumulative impacts of uncoordinated Nationally Significant Infrastructure Projects on the Suffolk coast

The East Suffolk coast is subject to multiple Nationally Significant Infrastructure Projects (NSIPs). The concentration of these large-scale projects has the potential to create significant detrimental cumulative impacts on both the environment and local communities.

ESC is supportive of government policy on the transition to renewable energy and the requirement to maintain security of supply and recognises the need for transformative development to meet governmental ambitions for Net Zero set out in the British Energy Security Strategy and other recent publications. However, this presents particular challenges and raises concerns for East Suffolk and so this letter sets out the Council's significant concerns in relation to the impacts of the consented and proposed developments in the district and seeks to ask the Secretary of State to intervene.

Following the local elections in May this year, East Suffolk Council's administration has changed. The Council considers the best way forward for energy security is to invest in genuinely renewable energy. Whilst it is recognised that Sizewell C benefits from development consent granted last year by the Secretary of State, it is now considered that the Sizewell C project is not the best means to provide energy to meet anticipated future demand, but also that it displaces the urgent actions needed now in the face of climate emergency and the spiralling energy bills leading to fuel poverty.

In addition, East Suffolk Council has further concerns about the project and believes that construction of Sizewell C should only proceed once long-term solutions to a number of issues have been found, some of which are within the District Council's control, others are not, and hence are being highlighted within this letter. These include:

- Water supply
- Sea defences and coastal dynamics
- Long term local storage of highly radioactive spent fuel
- Marine biosphere impacts
- Satisfactory confirmation of the size of the development site with associated impacts on Minsmere and other precious habitats

LEGAL ADDRESS East Suffolk House, Station Road, Melton, Woodbridge IP12 1RT

POSTAL ADDRESS Riverside, 4 Canning Road, Lowestoft NR33 0EQ

Notwithstanding this view, East Suffolk Council continues to work hard to ensure the benefits to the district from the Sizewell C project are maximised whilst simultaneously seeking to minimise the adverse impacts.

While the Sizewell C project is of significant scale and impact, is not the only NSIP which needs to be delivered within this rural locality. Significant other infrastructure development is planned. In 2022 the Secretary of State also granted development consent for the East Anglia One North and East Anglia Two offshore windfarm projects. These consented projects are in addition to further proposed NSIPs; Sea Link, LionLink, and Nautilus, all currently at pre-application stages.

East Suffolk Council has continually raised concerns regarding the cumulative impacts of these multiple NSIPs for a number of years, both to government through letters and consultation responses, to government regulators, and to developers of individual projects. In this time, there has been a general trend towards integrated and strategic approaches for energy infrastructure provision, but this will come too late given the extent of consented and planned projects in the district.

A full cost benefit analysis is required of the options for connecting all the currently proposed and consented offshore wind, multi-purpose interconnectors, and reinforcement projects to users in the UK. To be realistic, this cost benefit assessment must internalise social and environmental costs including the downstream savings of investing in offshore infrastructure now which can facilitate the connection of future projects. There is an essential need to move away from the uncoordinated piecemeal approach to connections which has and continues to take place, and toward a coordinated strategic approach. While the Pathway to 2030 and Enduring Regime workstreams of the Offshore Transmission Network Review may secure a more holistic approach to future projects, it will come too late for East Suffolk, which requires such an approach now.

A holistic and coordinated approach is needed now to deliver the energy infrastructure necessary to meet the needs of 2030. The approach should seek to prioritise the use of brownfield sites for new infrastructure over greenfield sites, look to explore the benefits of offshore connections and solutions, and provide thorough and reasoned justifications for all alternatives considered and discounted. Whilst it is recognised that connections to onshore will need to be made, these connections should be carefully considered to ensure they connect closer to the areas of high demand.

The outputs from the Offshore Coordination Support Scheme (OCSS) were promised in the summer followed by a specific East Anglia Study undertaken by National Grid Electricity System Operator. No information has been provided in relation to either of these matters. It is not considered that either of these initiatives would go far enough given the opt-in basis they are being approached, however the lack of information regarding these matters is disappointing.

In addition to the cumulative impacts as a result of the delivery of multiple NSIPs within East Suffolk, we are concerned about the consenting process, which includes the pre-application phase, and the huge burden this imposes on the local communities. We would like to see greater coordination

between the promoters in relation to this matter, especially considering LionLink, Sea Link and Nautilus are all being promoted under the umbrella of the National Grid Group.

In addition to the above, the communities in this part of Suffolk need to be appropriately compensated for the disruption and long-term impact they will suffer both in terms of the construction phase and the 'industrialisation' of large areas of attractive, un-spoilt open countryside and designated landscapes.

The benefits of security of electricity supply are felt nationally, but the impacts of hosting such large infrastructure are felt by communities closest to it. These impacts are felt during the lifetimes of these projects, from construction, operation, and decommissioning. It should be noted that these impacts are created in a context where no significant economic benefit in the immediate area once the construction phase is over is provided.

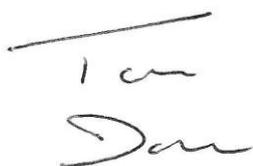
Government led and funded community benefit has been proposed in relation to new nuclear proposals, although further guidance is awaited, but there has been no policy basis for community benefit in relation to other NSIPs. East Suffolk Council has engaged, and will continue to engage, on the government's proposals for community benefits. Further to the consultation on community benefits this year, ESC asks for a mandatory direct community compensation scheme for those directly impacted by hosting the energy infrastructure as a matter of urgency as per their recent consultation in addition to provisions in the development consent process.

Our request is therefore three-fold. We seek further discussions with you regarding the following:

1. A full cost benefit analysis of the options for connecting all the currently proposed and consented offshore wind, multi-purpose interconnectors, and reinforcement projects to users in the UK, with prioritization being given to offshore solutions connecting the power directly to areas where the demand is needed and the utilisation of brownfield sites.
2. Assistance to ensure that the consenting process related to the NSIPs proposed within East Suffolk is coordinated.
3. A commitment to mandatory community benefits for communities directly impacted by hosting energy infrastructure.

We look forward to hearing from you on the above and would welcome you visiting East Suffolk to discuss these matters further.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tom Daly', with a horizontal line above the first name.

Councillor Tom Daly | Cabinet Member for Energy and Climate Change
East Suffolk Council