

Rt Hon Greg Clark MP
Department for Business, Energy and
Industrial Strategy

Rt Hon James Brokenshire MP
Department for Housing, Communities and
Local Government

Dear Secretaries of State

Local authority concerns regarding the cumulative impacts of Nationally Significant Energy Development on the Suffolk Coast -Offshore wind energy and international interconnector proposals making landfall and grid connection at Sizewell in Suffolk and the development of Sizewell C new nuclear power station

Overview

The east Suffolk Coast, in the vicinity of Sizewell, in the Suffolk Coastal DC area, is soon to be inundated with further major energy infrastructure projects which will provide in the region of 25% of the UK's electricity requirement. In addition to the existing Sizewell A and B nuclear power stations and sub-stations for the Galloper and Greater Gabbard offshore wind farms, the area is now expecting the Sizewell C nuclear power station plus two sub-stations for Scottish Power Renewables East Anglia Offshore 2 and 1 (North) schemes; two inter-continental connector converter stations for National Grid Ventures and a single major National Grid Transmission sub-station connecting these to the pylon lines.

The location of these developments, set out below, is set within a highly sensitive landscape, being within the Suffolk Coast and Heaths AONB and Heritage Coast. The area is also poorly served by transport infrastructure, and given the significant scale of these projects there are serious reservations with regard to how the construction of all these developments, in combination, can be delivered without further exacerbating adverse impacts on the locality and reducing the attractiveness of the area to residents and visitors alike. The points below relate to the Scottish Power Renewables and National Grid proposals, though this needs to be considered in the context of Sizewell C coming forward at the same time.

Whilst we are supportive of Government policy on the transition to renewable energy and the requirement to maintain security of supply, this letter sets out the strong concerns that Waveney District Council, Suffolk Coastal District Council and Suffolk County Council (the Councils) have about the impact of the current and future set of proposals in the Sizewell and describes an initial four practical measures that the Government could take to ensure the impacts are properly assessed and mitigated. It asks for the opportunity to meet with Ministers to explain this further.

The area also has its socio-economic challenges so these developments are seen very much as game changers, as part of a wider package of economic development investments in the area that we want to embrace and support whilst acknowledging that to do this comprehensively, for the future benefit of the area needs the support of Government to help get it right. Suffolk County Council and Suffolk Coastal and Waveney District Councils (The Councils) support and embrace the principle of low carbon energy generation and the trading of energy across a European wide transmission network and want to help them be delivered if the local dividend is for the benefit of the whole area. Therefore the Councils are committed to working together to ensure that where such schemes are brought forward they will have a positive impact on Suffolk, and East Suffolk in particular; supporting significant local growth by delivering:

- substantial economic benefits;
- significant and sustained training and skills opportunities; and
- substantial community benefits.

The Councils are also committed to driving forward substantial housing expansion and other infrastructure development in the vicinity, including the A12 Suffolk Energy Gateway, flood protection scheme at Lowestoft, the expansion of the Port of Felixstowe and the development of new river Crossings in Ipswich and Lowestoft, as well as the development of the Ipswich Northern by-pass. This letter is the first stage in a hopefully productive relationship between Government and the Councils to facilitate wider investment and infrastructure improvements in Suffolk, in particular, East Suffolk.

The Councils consider that Sizewell C is of the highest importance to Suffolk and that it offers significant local employment and skills opportunities, as well as long term economic benefits associated with 900 full time positions in the District and associated annual spend in the local economy. The Councils consider that, subject to comprehensive mitigation as well as compensatory and other packages, these benefits may balance the significant environmental, social and public amenity impacts arising from the construction and operation of Sizewell C.

The Councils note that, in addition to the extensive offshore elements of the wind projects proposed by Scottish Power Renewables (SPR), the combined onshore footprint of the offshore wind and interconnector projects, (based on preliminary discussions between Suffolk Coastal District Council (SCDC) and National Grid Ventures), is of approximately the same order as that of the Sizewell A and B stations combined.

There are four key areas where we are looking for Government to intervene at this time:

1. The proposed Scottish Power Renewables sub-stations and National Grid Transmission sub-station are intended to be treated as Nationally Significant Infrastructure Projects to be dealt with through the Development Consent Order process and will eventually be the subject of decision making by the Secretary of State for Business, Energy and Industrial Strategy. National Grid Ventures by contrast proposes that their schemes should be the subject of Town and Country Planning Act processes and decided by the District Council as local planning authority with recourse, if necessary, to the Secretary of State for Housing, Communities and Local Government. It is our view that the schemes need to be considered as a whole, in particular as the location of the first proposals to seek approval will inevitably influence the location of subsequent schemes. This will be challenging with different consenting regimes, particularly given the sensitivities of this location and the

environmental designations therein. We ask that the Government ensures that the National Grid Ventures schemes are treated as Nationally Significant Infrastructure Projects in this instance so that all of the impacts of construction and operation can be considered in the round.

2. As we understand it, consideration of the various schemes by the same regime will not of itself ensure that the in-combination impacts can be assessed before in principle decisions on location are made. The current guidance used by the Planning Inspectorate appears to be that the first of the schemes to come forward will not be able to assess the cumulative impact of schemes that will follow. However, the location of the National Grid Transmission sub-station, which will come as part of the first application, will inevitably draw subsequent development to the same broad vicinity. Yet the longer term consequences of the first decision will not be capable of being assessed when looking at its implications. The ask here is that Government should ensure that there should be recognition of the cumulative consequences of the precedent being laid down by the first decision.
3. In the view of the Councils, the most advantageous site for the location of the sub-stations and convertor stations has not been capable of being included for consideration by Scottish Power Renewables because it is owned by EDF Energy (see map appended). Although within the Area of Outstanding Natural Beauty, the landform, the existing landscaping and the relationship with the existing built structures at Sizewell A and B mean that it will be able to accommodate the scale of development required much better than any of the locations suggested by Scottish Power Renewables. Although not part of the operational land required for Sizewell B or a future Sizewell C, EDF Energy is unwilling to lose the land as they state that it is to be used for environmental mitigation of the construction of the new Sizewell C. In the view of the Councils, there is other land capable of meeting these purposes in the vicinity but which cannot so readily accommodate the substantial structures being proposed for the new energy projects. The ask of Government here is that pressure is brought to bear on EDF Energy to treat with Scottish Power Renewables to bring this land into the assessment process.
4. While other schemes in the area, notably Sizewell nuclear power station, have an on-going benefit to the area due to the additional economic activity they can bring, the Scottish Power Renewables and National Grid sub-stations and convertor stations will continue to blight the area for many years wherever they are located, yet will bring no benefit to the immediate area. The construction, care and maintenance of the offshore windfarms will have benefit in some of our ports, 30 miles or more away, but the inter-connectors will have no employment attributed to them once construction is complete. The communities need to see some sort of compensation for the impact on their areas, but it is not clear how this would come forward. We would ask the Government to support the local authorities, both in terms of encouraging the developers to compensate local communities for their impact on the environment and communities and in responding to the strategy proposed for the wider growth of East Suffolk, of which the energy projects are a part (set out in more detail later on in this letter).

We recognise the importance of the Government's energy strategy and the move towards more renewable forms of generation but would ask that we meet you in the near future so that we can

explain these issues described above in more detail and explore how Government may assist in ameliorating what appears likely be very considerable impacts on our area which is having to bear the significant growth of renewable energy. This letter has also been signed by the Leader of Waveney District Council as by the time that examination of any of the schemes, Waveney and Suffolk Coastal Districts will have been merged into East Suffolk District and there are wider implications for the whole of East Suffolk with all of these projects converging in this sensitive landscape.

Yours sincerely



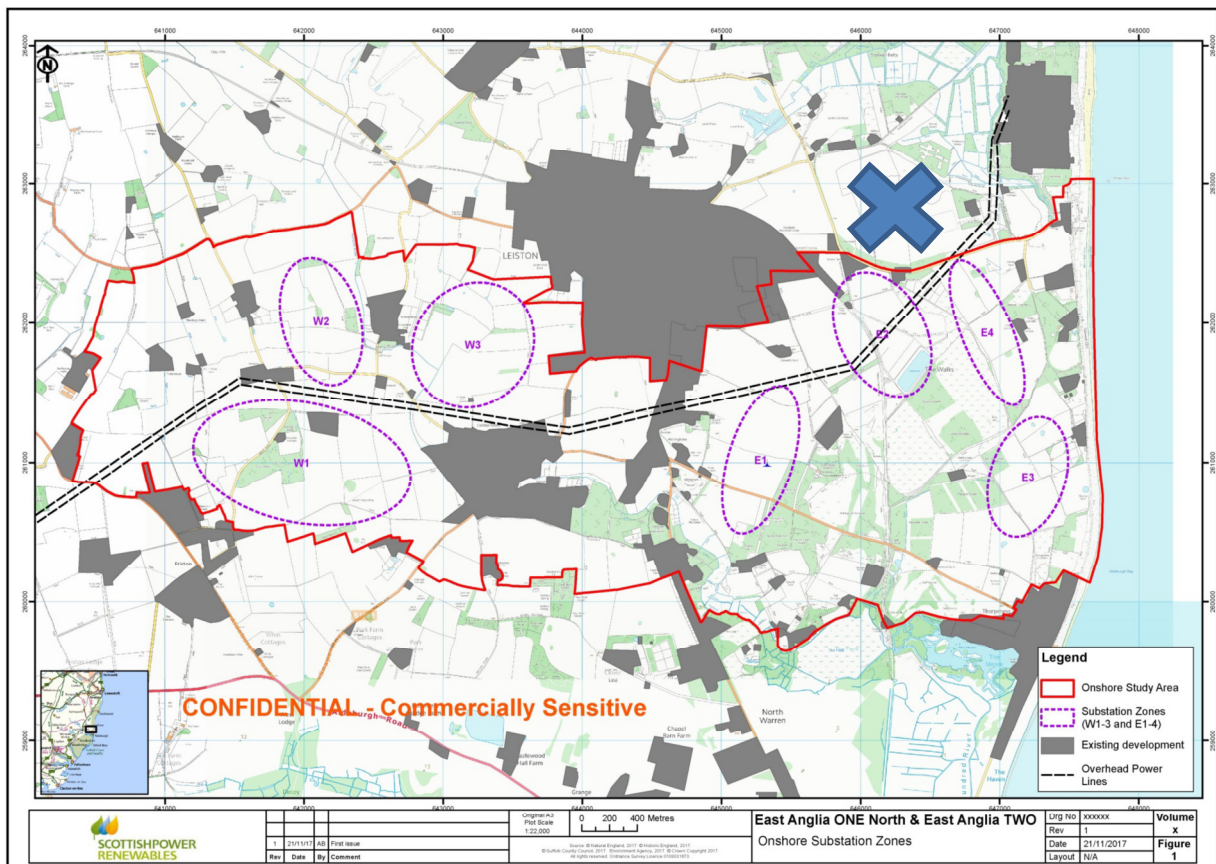
Cllr Ray Herring
 Leader
 Suffolk Coastal District Council



Cllr Mark Bee
 Leader
 Waveney District Council



Cllr Colin Noble
 Leader
 Suffolk County Council



The Councils preferred location for onshore equipment

Further detailed information:

Introduction

The purpose of this letter is to highlight the following key strategic issues based on the work and discussions with the various projects that has been carried out to date, relating to:

- a) The proximity of the Sizewell C new nuclear, Scottish Power Renewables offshore wind farms and National Grid Ventures intercontinental connector projects;
- b) The overlapping construction periods of the Sizewell C, Scottish Power Renewables, and National Grid Ventures projects;
- c) The cumulative and sequential environmental, public amenity, socio-economic and infrastructure impacts of the construction and operation of these projects; and
- d) The variation in consenting regimes between these projects.
- e) The wider economic growth of the east Suffolk area and the linkages with these projects.

It is important to recognise that there will be other localised / detailed issues arising from the construction of the onshore infrastructure needed to support the proposed offshore wind farms and inter-continental connectors. Such detailed issues will continue to be addressed by all the Councils in their statutory role as local planning authorities; and the County Council as statutory highway authority, lead local flood, and the minerals and waste planning authority.

Background

The proposals - There are currently two Nationally Significant Infrastructure Projects (NSIPs) for offshore wind farms and one for a twin reactor Nuclear Power Station which will be going through the Development Consent Order (DCO) process in Suffolk and are currently at pre-application stage:

- East Anglia TWO (SPR)
- East Anglia ONE North (SPR)
- Sizewell C (EDF Energy)

These proposals will be determined by the Secretary of State for Business, Energy and Industrial Strategy as they are defined as a Nationally Significant Infrastructure Projects (NSIP) under the Planning Act 2008.

In addition there are two projects for International interconnectors the Councils have been made aware of via National Grid's TEC register: the offer for two inter-continental connectors – Eurolink and Nautilus to be connected to the National Grid at Sizewell.

The onshore elements of these proposals will be determined under the Town and Country Planning Act (TCPA) 1990 by Suffolk Coastal District Council as local planning authority, yet onshore, are of a similar if not more significant scale as the onshore elements of the offshore wind proposals. These proposals are not within the District's current Local Plan and should they be approached negatively, have the potential to be determined through the existing planning appeal process which is determined by the Secretary of State for Housing, Communities and Local Government. The difference in consenting regimes for the various projects has the potential to lead to risk for the promoters / developers of these various projects.

Action required –

Having reviewed the proposals and considered the benefits and dis-benefits of each of the projects proposed, it is considered that in order to optimally address the proposals singularly and cumulatively, all of the projects should be considered as Nationally Significant Infrastructure Projects under the Planning Act 2008. The interconnector projects by virtue of their international significance in maintaining security of energy in the UK and abroad and having regard to the sensitive landscape and cumulative impacts of the two National Grid Ventures projects with the new nuclear proposal and offshore wind farms necessitate and justify consideration of all of these significant energy projects under a single regime – namely the NSIP process under the Secretary of State for Business, Energy and Industrial Strategy.

Regionally

In addition, our colleagues in Norfolk are facing their own challenges with multiple offshore wind energy proposals making landfall and grid connection in Norfolk. To the south, Bradwell in Essex is proposed for a new nuclear power station; cumulatively East Anglia is proposed to be responsible for these numerous new grid connections providing for the next generation of low carbon energy supply for the UK as a whole. It has been calculated and estimated that East Suffolk alone will be responsible for approximately 30% of the UK's power generating supply to the National Grid once these projects come on line (to include connections at Sizewell and Bawdsey).

National Policy – at a national level the key energy objectives are:

- Reducing greenhouse gases (carbon reduction);
- Providing energy security; and
- Maximising economic objectives.

In order to meet these objectives more energy infrastructure is required with an increased emphasis on energy generation from renewable and low carbon sources.

The Government is committed to the following targets by 2030:

- A 40% cut in greenhouse gas emissions compared to 1990 levels;
- At least a 27% share of renewable energy consumption; and
- At least 27% improvement in energy efficiency.

It is understood that the proposals for new nuclear and offshore wind farms are recognised as being broadly consistent with national targets and objectives on renewable energy and climate change. In addition, the proposals for inter-continental connectors support the key energy objective of providing energy security by enabling energy exchange with international partners, in this instance Belgium and the Netherlands.

Grid Connection and Electricity Supply Issues

Collaboration – there have been ongoing meetings between EDF Energy and the Councils, between SPR and the Councils and at Suffolk Coastal District Councils behest between EDF Energy, SPR, National Grid Ventures and National Grid in order to understand, discuss and potentially address the cumulative impacts to East Suffolk of hosting the numerous energy projects proposed. In addition, the East Suffolk authorities with the County Council have been meeting with

Essex County Council and Maldon District Council (Bradwell) to discuss potential synergies between new nuclear projects and opportunities for collaboration, knowledge sharing and potentially resource combining.

Given the significant infrastructure required onshore to facilitate these primarily offshore projects (not the nuclear) consideration should be given to an offshore hub hosting the onshore substation requirements for all of the projects thus eliminating the massive intrusion into the rural landscape resulting from the individual projects.

Action required –

Any energy promotor / developer making landfall and grid connection in East Suffolk must work together and with the Councils to address the cumulative impacts whether beneficial or detrimental to the host communities.

Consideration should also be given to investing in an offshore hub to host necessary substation requirements and to avoid adverse significant impact on the rural environment of East Suffolk.

Socio-economic issues

There are potentially significant economic benefits arising from the new nuclear proposal at Sizewell, however, there have not been significant economic benefits arising from the offshore wind farms that have been identified to date.

Suffolk and East Suffolk is seeking:

- High quality jobs;
- Supply chain opportunities; and
- Longer term jobs – operations and maintenance.

Proposals at Sizewell C new nuclear power station will provide for 900 operational jobs located at Sizewell, there will be annual sums of millions of pounds into the local economy resulting from Sizewell C. The onshore wind farm infrastructure and onshore interconnector infrastructure do not appear to provide for any operational jobs in the local area with the main benefit being in the operations and maintenance of the wind turbines offshore. Some of this is being provided by the Port of Lowestoft and it is good to note the increased activity and jobs growth in this town which is in need of investment. However there is an unacceptable impact on the communities hosting the new infrastructure that is unlikely to be mitigated and will therefore require significant compensation.

In addition to seeking economic benefits, there must be an opportunity for the Energy Companies to work with schools, colleges and the Councils to develop a Skills Strategy aimed at creating:

- Local apprenticeships and training initiatives;
- Work experience opportunities;
- Internship opportunities; and
- Significant upskilling opportunities.

The Councils are already working closely and collaboratively with EDF Energy in this area and would welcome further investment and input from Government and the Energy Companies.

Action required –

Joint working with Government, Energy Companies and Council to develop and invest in a skills strategy which will benefit the local community and provide schools and colleges with the means to teach the new skills required to facilitate the energy projects.

Community Issues

Sizewell and its surrounding areas are proposed to be massively impacted by up to five energy projects over the next 10 – 15 years, including a new nuclear power station, landfall and onshore infrastructure associated with two offshore wind farms and landfall and infrastructure associated with two intercontinental connectors. All significant development and only the new nuclear proposal will result in permanent jobs in the locality and an ongoing supply chain opportunity.

The impact on these communities will need to be assessed, mitigated and compensated for by the Energy Companies and by Government. This also needs to be considered against the wider growth opportunities that are being brought forward in East Suffolk.

Action required –

The Energy Companies within their individual Environment Statements should provide supporting documentation on how the impacts of the onshore construction of their proposals on local communities can be satisfactorily mitigated. Any disruption caused by a cable route and the laying of cables must be kept to a minimum.

Where appropriate construction timetables between the projects should be aligned, development footprints minimised and where appropriate facilities shared such as compounds, highway routes, haul routes etc. in order to minimise adverse impacts on the local community and businesses.

In-combination effects of all projects regardless of what stage in the process they are must be considered. It is unacceptable for certain projects not to be assessed because they have yet to be formally embarked upon given the potential cumulative impacts of these large scale projects.

An appropriate compensation package is to be identified by each individual project to mitigate their own individual adverse impacts on the local community – residents and businesses, in addition a cumulative package needs to be assessed addressing and acknowledging the adverse cumulative impacts of the five projects on this part of East Suffolk and finally a Government led package of mitigation and compensation to the hosting community in recognition of their sacrifice and adverse impact resulting from their significant contribution to maintaining the UK's energy supply.

Environment

The coast at Sizewell is at the narrowest point of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, a national designation, of which East Suffolk is proud and protective. In addition, there are a suite of landscape and ecological designations on this part of the Suffolk coast, both onshore and offshore that have the potential to suffer adverse harm from these projects, in addition to the expected impacts of the construction and operation of Sizewell C.

This area currently hosts the decommissioning Sizewell A Magnox nuclear power station, the Sizewell B EDF Energy operating nuclear power station, the Greater Gabbard offshore wind farm onshore substation, the Galloper offshore wind farm, onshore substation and is proposed to host

the new nuclear power station Sizewell C. This is a significant section of the AONB hosting industrial and large scale infrastructure on behalf of the country. It is considered by the Councils to currently be mitigated by significant planting in the vicinity. However, no amount of planting can successfully mask the nuclear power station buildings.

However, it is considered that co-locating the proposed onshore infrastructure to service the offshore windfarms and intercontinental interconnectors could have a significant benefit to the wider environment and community. This conclusion has been reluctantly reached having regard to the wider issues resulting from locating the infrastructure in the agricultural countryside with greater impact on residential populations. A benefit of co-locating adjacent to the existing energy infrastructure at Sizewell is the reduction in residential properties directly impacted by the proposals. A plan of the proposed location is attached to this letter. It is land currently owned by EDF Energy and proposed for ecological mitigation in the form of reptile habitat. However, there are alternative sites that this mitigation and compensation could be located on and therefore it is considered that the optimum use of this land for the community would be to co-locate the onshore infrastructure associated with the offshore developments in this location. The land is suitable to allow re-engineering in order to mitigate the overall height of the structures and there is adequate available land to provide mitigation in the form of planting. The new buildings will still be visible but it is considered that with two existing and one proposed nuclear power stations in the background that this would help to mitigate against the developments as proposed and would ensure that the industrialisation is kept within close vicinity of each other rather than affecting a wider landscape. There would need to be significant work undertaken to minimise the adverse impact on the AONB but overall it is suggested that this could be achieved and that on balance this location within the AONB would outweigh any other site in the wider countryside in the vicinity.

Further to the socio-economic benefits and dis-benefits associated with such developments, the cumulative and in-combination effects of the construction of these projects is of particular concern given the duration and extent of disturbance and disruption to, or severance of, habitats.

This may lead to the disruption, or permanent loss, of Priority Habitats both within and outside the designated areas, which support the resilience of designated sites and sensitive species, including European Protected Species.

The area has a high number of nationally designated archaeological sites and listed buildings, and sites of high archaeological significance and potential. Proposals will have a direct impact upon surviving below-ground archaeological remains and a setting / visual impact upon above-ground heritage assets.

Action required –

EDF Energy should be required as statutory provider of energy and landowner to consider alternative arrangements for ecological mitigation / compensation land, and to consider permitting the offshore energy providers to co-locate their onshore infrastructure on EDF Energy owned land adjacent to the existing energy infrastructure including their own existing nuclear power station and proposed station Sizewell C.

Further detailed work is to be carried out to assess in-combination and cumulative impacts of the development proposals on the environment as identified previously.

Wider Economic Growth and Infrastructure requirements

East Suffolk is also embarking upon an ambitious growth programme to support the ambitions of the New Anglia LEP growth strategy and the wider support necessary to deliver much improved required transport and other infrastructure.

Embracing the development of the major energy investment helps to articulate the scale of the opportunity but that comes with some significant challenges in terms of coordinating and delivering the development in the right way for the investors but also for the host communities.

The East Suffolk Council's Local Plans will be aiming to deliver a minimum of 21000 homes by 2036, many of which are predicated on the jobs requirements of the energy businesses. In addition the east Suffolk area hosts the Port of Felixstowe which handles 44% of all container traffic imports into the UK. It needs to expand and update its facilities. This will also need improved transport connectivity along the A14/A12 and east rail. The energy developments will also have to utilise these routes for access for their construction vehicles. The offshore wind, as mentioned earlier, is having a positive impact on the regeneration of Lowestoft. Lowestoft is seeing investment in its port and related business but also CEFAS are redeveloping their premises with a £20m new development that will allow it to grow as well as develop incubator businesses too.

Action Required -

Whilst the above summary only really scratches the surface of the economic opportunities that the three councils are looking to deliver it is hoped it provides an indication of our ambition but also the challenges we face. It is in all our interests to facilitate these developments but it is requiring a planned coordinated approach with appropriate interventions as necessary to ensure that the sequencing of development and delivery of mitigation and compensations is properly and fully considered.

Summary

In summary, the Councils want to support the energy infrastructure proposed in East Suffolk but to date have not been given the confidence that to do so would not result in unacceptable harm to the local environment and the existing communities.

The potential for economic benefits in relation to the offshore proposals have to date not been demonstrated as being significant enough to outweigh the disruption and longer term adverse impact on the local environment and communities. There has been to date inadequate demonstration by Energy Companies that their proposals would be adequately mitigated and there has been no discussion to date on compensation for the residual harm which will arrive from all of the Energy Projects proposed, on the communities, residents, businesses, environment and in particular the designated landscape and coastline.

The Councils want to be able to support such proposals in the vicinity of Sizewell, but to do so, need to be convinced that such developments can be appropriately accommodated in a suitable location and that adequate mitigation and compensation will be forthcoming in particular for the local communities.

We welcome the opportunity to work closely with Government and the promoters and developers in relation to this sensitive and significant matter and would welcome a meeting at your earliest convenience.

This letter will be copied to:

1. Stephen Speed, Director, Civil Nuclear and Resilience Directorate, BEIS
2. Simon Ridley, Director General, Decentralisation and Growth
3. National Grid
4. Planning Inspectorate
5. UK Power Networks
6. EDF Energy
7. Scottish Power Renewables
8. National Grid Ventures
9. Dr Daniel Poulter MP Central Suffolk and North Ipswich
10. Peter Aldous MP Waveney
11. Dr Therese Coffey MP Suffolk Coastal