

Fiona Gilmore SEAS

GOOD EVENING

My name is Fiona Gilmore and I speak on behalf of Suffolk Energy Action Solutions, the SEAS Campaign (in short), which has a growing number of supporters from across the UK, as well as from Norfolk and Suffolk. SEAS supporters have sent thousands of postcards to the Secretary of State, Andrea Leadsom, in the Autumn 2019 asking for a BEIS Review into offshore transmission infrastructure and now it has been called. We believe the short-medium term workstream for the BEIS Review can make a positive difference to this DCO Examination before Deadline 4, date TBC.

People across the UK have united behind a common cause. A call for fairness and justice. I speak tonight for the people whose voices may not be heard. We are strongly in favour of wind energy.

With the growing sense of excitement around the country regarding the opportunities for the UK to lead the world in Renewables and particularly, in wind energy, we are hugely disappointed in the Applicant's offshore transmission infrastructure plans for EA1N and EA2.

These plans defy credibility, make no sense to us. We can really sum them up in just two words: **IRRATIONAL** and **DISINGENUOUS**.

The adverse impacts of this 12-year construction programme, building the UK's largest wind energy industrial complex outweigh any benefits. For the

health of our environment, economy and well-being of our communities, these plans are deleterious.

Amongst diverse communities, there is a profound sense of anger and frustration and for others a feeling of apprehension. A nightmare surely that one will wake up and see that it was just a horrid dream? But, no.

I speak for the SEAS campaigners when I say that we are:

DISAPPOINTED: that there's no logical trail between the green credentials of the energy generation at sea and its connection to the Grid on unspoilt countryside. We ask the question, as long as **wind generation** is green, is it then: **to hell with everything else?**

DISAPPOINTED: in the NSIP process, which was never intended for a single site with designation for multiple substation and interconnector usage. The legal criteria for the NSIP process are narrow and seem to be no longer fit for purpose given these multiple substation objectives. The consequences for this small area merit more considered and contextualised evaluation than a DCO process permits. **DISAPPOINTED:** that the UK had no Master Plan for offshore transmission infrastructure, during the last ten years; how embarrassing is that? Given its critical role in the delivery of our zero carbon emission targets and given our much talked about world leadership ambition.

DISAPPOINTED: in Ofgem's and National Grid's role in all of this as well as the Crown Estates.

DISAPPOINTED: that these plans are flaky. The assessment methodologies are at times limited to just desk research and that is inadequate given the unique circumstances and context of coastal Suffolk and scale of projects. Key evaluation factors have been omitted and quantitative assessments have at times used outdated methods and not taken into account the cumulative impacts.

DISAPPOINTED: that local people live under this cloud, they are so worried and fearful of the “threat “, because that’s what they call it, that some have become sick with worry, others have fallen into depression. Those of a certain age, came to live here after years of working in the ‘smoke’, now looking for the golden years to be sweeter in the countryside, living within a thriving rural community, enjoying the tranquillity, the wildlife and beauty in Nature. Simple things that we wish to preserve, not in aspic, but protected from needless destruction. Younger people are simply appalled that in the name of green energy, we are about to ravage one of our most fragile, precious parts of the countryside. **Is that a noble legacy?**

The pressure for local interested parties, especially at a time of personal and national upheaval cannot be underestimated. We believe that these plans are materially flawed.

For the Open Floor Hearings, we can only summarise major concerns but rest assured, these will be amplified in the written submissions and at issue specific hearings where we wish to speak on the following issues: BEIS Review, choice of site, roads and air quality, wildlife, Thorpeness, as well as

economic prognosis for Aldeburgh, Snape Maltings and SMEs in coastal Suffolk.

For now, just a few of the issues in no particular order:

1. The UK has no **Master Plan** for offshore transmission infrastructure. The BEIS Review called on 15 July 2020 puts emphasis on ensuring the appropriate balance between *(and I quote)* “environmental, social and economic costs in finding the most appropriate way” to deliver transmission connections for offshore wind. We believe that the DCO for EA1N and EA2 should not be granted at this premature stage. The DCO should only be granted when a more suitable way forward is decided upon and policy recommendations and proposed changes to the existing regime are made. With a majority Government, this reform can be fast-tracked.

2. The Applicant (in this case National Grid is included) have failed in their duty of care to keep up to date and to consider new generation transmission technologies as better alternatives to the current planned technology system, and that failure in turn has contributed to the wrong choice of site for the location of the substations. We say better alternatives. We are talking about proven technology solutions, which deliver substantial benefits for all parties concerned: more synergies and efficiencies can be achieved and these solutions tick the key boxes: cost, security, consistency, timescale and most importantly because these are offshore solutions, **needless damage to the environment is avoided as the onshore connection is then made at a brownfield site.**

3. The Applicant (in this case National Grid) has failed despite Freedom of Information requests to give any reasonable explanation as to why **Bramford** was not chosen as the site location, given that it was originally selected. In their “Note on the Assessment of options for the connection of SPR EA1N and EA2 offshore wind farms to the National Grid Network”, dated 28 June 2018, this explains why the offshore wind farms are proposing to connect to the NETS in Sizewell/Leiston area, but given that Bramford was an already brownfield site with EA1 and EA3 designated there, **it is curious that this site selection was abandoned relatively late in the process.**

4. The Applicant (in this case National Grid) does not give a rationale as to why **Bradwell** was not fully considered; the Rt Hon Therese Coffey, MP for Suffolk Coastal, states in her Relevant Representation, received by the Planning Inspectorate on 27 January 2020: (and I quote)

“Throughout the consultation stages, I have suggested alternatives to SPR, **including Bradwell**, which would have meant less onshore cabling and substations in a more appropriate location...”

5. Deficiencies in the Red-Amber-Green (RAG) assessment for the substation(s).

The RAG assessment does not consider the combined effect/suitability of co-locating 3 substation sites in one location, or a greater number as is now becoming apparent. Use of the correct methodology early in the process would have resulted in a different conclusion and led to the choice of a site

with less significant environmental and socio-economic impacts being taken forward.

If one is simply looking at 2 years of construction and one set of substations, the degree of horror is not as great as 12 years of ongoing construction and a concatenation of 8 substations and inter-connectors. Make no mistake. The Applicant is the harbinger, the **Trojan Horse** for this onslaught on our precious countryside.

6. Others will elaborate in great depth as to why the medieval village of Friston was a very poor choice of location. We are therefore going to reference other places and communities impacted directly or indirectly in no particular order with questions relating to the thoroughness and rigour of assessment methodologies.

Our economic prognosis for coastal Suffolk, based on the cumulative impacts is of grave concern.

Things here for most SMEs are finely balanced. Profit margins are tight. The tourism and visitor industry accounts directly or indirectly for at least 30% of total revenue streams. We have concerns for the future of Thorpeness, Aldeburgh and the Snape Maltings. In our written submissions, we shall amplify our specific concerns based on numerous studies and assessments that have already sought to address this threat to this region.

A conservative evaluation according to the DMO Energy Coast report of the potential loss caused by the cumulative impact could be £40m per annum.

7. The Wildlife has no voice, so SEAS is speaking up for our rare habitats and thriving communities in the cable corridor areas, in particular.

One of our young SEAS members is a Zoologist, who has written a full report of the prognosis for permanent destruction to these habitats. There is a biodiversity crisis occurring right now and this site location is emblematic of hollow words. We hear on the one hand from those who have a platform that Biodiversity goals are paramount and yet here we are breaking up, fragmenting protected areas into islands which become more isolated as there is less migration.

Most populations of animals are a meta population connected to each other by migration paths. If these pathways are severed, such as by a gouged-out cable trench, inevitably declines and extinctions follow. This is an issue for the mammals, amphibians and reptiles.

Then the bird habitats become unavailable for sensitive wildlife, such as the red listed nightingale, turtle dove, linnet and other migratory birds who would have nested there.

As Sir David Attenborough states: “people must feel that the natural world is important and valuable and beautiful and wonderful and an amazement and a pleasure”.

How do we then value the countryside, the loss of a nightingale, or a pure, red deer?

In conclusion:

Is this the legacy for now and future generations? Wind energy infrastructure that robbed us of our precious countryside, forever.

We cannot accept these plans.