

The Rt Hon Sir Keir Starmer MP,
Prime Minister,
10 Downing Street,
London SW1A 2AA

Dear Prime Minister,

Re: The Real Blockers to Progress / Solutions for Faster Planning

As a local resident of the Suffolk Coastal area I am writing concerning your recent speech about streamlining the planning permission process for infrastructure projects, to cut down the number of legal challenges available and to stop “blockers”. I found some of your comments at best misleading and they are not the reasons for planning process delays. I am in favour of more offshore wind energy but reject current plans to connect this power to the grid on the Suffolk Coast as not fit for purpose, and not in Britain’s medium-term interest.

The Judicial Review Process and its Value:

- You suggest that "unarguable" cases can be brought back to the Courts three times, but this is not true, the right to challenge a planning decision in the courts is not granted unless it is deemed that the claimant has an arguable case with a realistic prospect of success, so speculative appeals simply would not be allowed to proceed.
- The right to appeal is only granted if the case has a real prospect of success, or for example the case raises an important point of law of wider public interest.
- The overriding reason why the judicial review process should remain in place is that developers and the Government sometimes make serious mistakes, and in particular developers (including National Grid) are primarily motivated to maximise profits for shareholders as opposed to considering other factors (e.g. environmental, economic and social/health impacts).
- My local campaign SEAS has credible concerns and an arguable case that the cumulative impact of Sizewell C plus the onshore infrastructure planned at Friston and Saxmundham for numerous offshore wind and other energy projects (EA1N/EA2, Lionlink, SeaLink) has never been properly considered.

The Real “Blockers” to Progress are those with the Power:

- The real “blockers” are those responsible for Britain’s current lack of a spatial energy strategy. Ofgem focused on short-term individual project pricing (not longer-term system-wide benefits) and National Grid ESO, now NESO, failed to push for the best medium-term offshore and onshore transmission network solutions as recommended by their own reports, including for East Anglia. National Grid ESO consistently chose sites as directed by developers for their projects to connect to the grid, on a purely tactical short-term pricing basis, ignoring cumulative impact. By default, they have ended up with a transmission network designed by developers, not as the result of a holistic approach which also considers environmental and societal impacts.
- The Government is also at fault. Greater Government direction and longer-term strategic planning would have led to an energy system design that would now enjoy greater buy-in and less resistance, leading to faster planning cycles, and it is not too late for this to happen. Other North Sea countries have invested in and retained control of their national grids and think more strategically to get their spatial plans right upfront. Britain stands alone as being short-termist, blinkered and surrendering to commercial business agendas. Working with industry is a key part of our future energy system but long-term transmission network design should not be left to developers who are legally obliged to maximise returns to their shareholders.

- This unthinking approach has to change now. Why should the Suffolk Coast be treated unfairly, it should not be too late for better solutions that spare the Suffolk Coast and Heaths from decimation, not too late to pivot to better solutions using brownfield sites closer to demand for energy hubs. The vital wetlands at risk are at the heart of the current climate change challenge and damaging them would be irreparable. The recent Panorama programme suggested that in the drive for Net Zero the ecological emergency seems to have been forgotten, I agree.
- We will challenge National Grid's current ill-conceived plans at DCO Examinations and through judicial review, as it would be a travesty if National Grid gained consent for their short-term profit-maximising plans. The cumulative impact of over 30% of Britain's offshore wind energy going through Friston is too great a burden and a significant security risk.
- I call for the British Government to take back control of the energy infrastructure spatial strategy from developers, it is this that will lead to quicker planning timescales, and safeguard the country for Britain's future generations.

Solutions for a Faster Planning Process:

- The route to quicker and easier planning processes is clearly demonstrated by the rapid progress of the Eastern Green Link 2 (EGL2) project through the planning process. This project between Peterhead and Drax involves i) Onshore infrastructure Hubs at brownfield sites, ii) Transporting energy over long distances by subsea HVDC cable (not overland) to brownfield sites closer to demand. Both these principles lead to much lower negative impact on the environment and communities and therefore greater buy-in from communities and a much easier and quicker planning process.
- These are exactly the design principles that SEAS and other campaign groups are proposing for where to create onshore energy hubs relating to North Sea wind farms off East Anglia (brownfield sites closer to demand) and how best to transport energy nearer to these centres of demand in London and the South East (via subsea HVDC cable).
- Even National Grid on their own website admit that these offshore subsea long-distance HVDC solutions are more cost-effective in the medium term, hence projects like EGL2, EGL3 and EGL4.
- Another example of a brownfield site meaning quicker and easier planning, is the brownfield Isle of Grain, ideally suited to energy infrastructure, and indeed the Nautilus interconnector will benefit from a quicker, easier and cheaper planning process because this will now be its connection to the onshore AC grid.
- Once suitable brownfield hub sites are selected for energy hubs, projects can then proceed more rapidly, with no need to undermine the judicial processes that protect communities and the public interest.

In conclusion, using brownfield sites closer to demand for energy hubs, pooling offshore wind energy where possible and transporting this power directly to these brownfield sites using subsea HVDC cables, will be faster to completion, cheaper in the medium term, and better for communities and the environment for generations to come. These are the essential first steps towards a flexible meshed offshore grid which can be realised in the medium term.

The Secretary of State Ed Miliband should visit the proposed hub sites in the Suffolk Coastal area, with their vital wetland environments and thriving tourism economies, to better understand what is at stake and to discuss alternative brownfield site locations.

Yours sincerely,