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Steve Gallant, Leader
East Suffolk Council
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By Email Only

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Dear Mr Gallant

SCOTTISH POWER & NATIONAL GRID – EA1N, EA2 AND NATIONAL GRID CONNECTION HUB

As you are aware the examination of the Scottish Power and National Grid projects is drawing to a close and the most recent submissions made in the examination were published late Monday morning. These included submissions by East Suffolk Council.

The move by ESC from objecting towards neutrality in January this year confirmed residents' concerns that important interests affecting the areas subject to development were not being represented within the greatly enlarged District Council area. As you are aware, that decision caused a great deal of concern if not anger. That has now been compounded by the Council's most recent submissions .

There are five issues I would wish to highlight but there are others. These issues are the noise impact of the projects, the cumulative impact of the projects with the other proposed offshore projects, flood risk, mental health and the "compensation" measures.

Noise impacts - the noise which the substations will emit in a very quiet rural environment has always been of great concern, not least as residents do not wish to live with a permanent background hum or by being woken up in the middle of the night by the operation of National Grid switchgear. Throughout the examination your noise experts have expressed concerns about the background noise levels assessed by Scottish Power and have criticised them, believing they are in fact significantly lower. Our expert has the same view and further that this is the one of the quietest areas in the UK he has ever encountered. However without any technical justification the Council has now decided to accept Scottish Power's background noise assessment and accepted Scottish Power's proposed requirement for noise emissions.

Aside from the lack of technical justification, the Council, in working with Scottish Power alone on this topic, has acted contrary to the wishes of Examining Authorities who asked that Scottish Power "*share technical conclusions with ESC and SASES, with a view to reaching agreement with all parties and submission of final drafting by the applicant at D8*". Instead the Council has chosen to engage with a process which has not involved "*reaching agreement with all parties*". One of the reasons for involving SASES' noise expert is that he is one of the foremost acoustic consultants in the country as evidenced by the fact he has been retained by EDF in relation to the Sizewell C project.

The position which the Council has now adopted in relation to noise mitigation is also contrary to law and policy, as the matter of determining whether Scottish Power can actually achieve the noise requirement is now to be determined after the Development Consent Orders are granted. It is well established that developers have to show that they are able to deliver the required mitigation before consent is granted.

As a result the Council's position on noise has become untenable.

Cumulative impact with other offshore projects - this has been a long-standing concern right from the beginning given the National Grid Interconnector projects, other existing offshore windfarm extension projects and yet further energy projects which could connect at Friston; the reality being that the National Grid substation is a new connection hub. Whilst there is some evidence that the extension projects will no longer connect at Friston (although this has now been confirmed as being the original intention despite Scottish Power denying this throughout examination) the alternative grid connection offer could easily change back to Friston once the National Grid connection hub is consented.

Putting that on one side, Scottish Power have finally carried out the most cursory of assessments based on the fact that the National Grid substation will be extended to serve the NGV interconnectors. This assessment could have been conducted at the outset based on information which has been available for at least a year if not longer. However leaving this to the last moment, with only three complete working days between publication and the end of examination, will prevent any serious examination of this assessment. This is a cynical abuse of the examination process. In any event the cumulative impact assessment is highly superficial with key impacts being ignored or assessed based on already understated impacts. We will be making submissions to that effect at the final deadline. I would hope the Council will choose not to be complicit in this abuse of process and not approve a highly superficial assessment of cumulative impact.

Flood risk - these projects will exacerbate an existing serious surface water flood risk at Friston and potentially create a new ground water flood risk. Scottish Power did not even consider surface water flood risk when they selected the site and have acted contrary to policy in selecting the site without properly addressing flood risk. Further the SUDS "ponds" that will have to be built in an attempt to mitigate the flood risk are so large they could be subject to the Reservoir Act. Scottish Power denies this and plans structures which will not be compliant with the Act. These reservoirs (which will not eliminate flood risk in any event) will be located above the height of the village but in close proximity to it. This is obviously highly undesirable. Again our views are based on the advice of a leading flood and drainage expert. Suffolk County Council has similar views. When the Council decided to move towards neutrality at the Cabinet meeting in January this year, the supporting paper downplayed the serious flood risk. Of course flood risk is a matter for the County Council, but the residents who are being put at a serious flood risk are residents both of East Suffolk District and Suffolk County. It seems inconceivable that the Council could be neutral let alone support a project where there is such a serious flood risk to residents. If the Council is in any doubt about the severity of the risk they should read the submissions of Suffolk County Council and those of our expert submitted at the most recent deadline.

Mental Health - Understandably these projects have already damaged the mental health of the community and will continue to do so if they are consented, and given the demographics of some members of the community, probably for the rest of their lives. However in its recent submission the Council completely abrogated responsibility for the mental health of the local population and dismissed it as being a matter for Public Health England. I find it surprising if Councillors consider they

have no responsibility for the mental health and well-being of the community they supposedly represent.

Compensation measures – the Council has entered into a Section 111 agreement for various types of “compensation” for the serious damage which will result from these projects if they are consented. In addition the council will enter into a memorandum of understanding which presumably covers the balance of the sums identified in the papers for the 5 January 2021 Cabinet Meeting. However it is impossible to establish this given the amounts in the MoU have been redacted which is a highly regrettable lack of transparency. Whilst some people might think the amounts involved are meaningful, they are insignificant when compared to the damage to the environment, peoples’ lives and the potential damage to the tourist economy. There are also paltry when compared to the overall level of investment in these projects which will be around £4 billion. No rationale has been presented as to why these figures are acceptable. In this context I would remind the Council that to date, and despite being seven years on from the grant of consent for the EA1 project, that only a single young person from Lowestoft has been recruited as an apprentice in Scottish Power’s much vaunted “apprenticeship programme”. The schools outreach program has been similarly limited.

In summary the perception of residents is that East Suffolk Council is bending over backwards to support Scottish Power, failing to properly address serious environmental issues and ignoring the concerns of the community. Given the above if Council does not move away from a position of neutrality and move back to one of objection, then the credibility in this community of the Council, Its Councillors and Planning Department will not recover. Accordingly I would request that this letter is placed before the upcoming Cabinet meeting of the Council, the next Planning Committees meetings of the Council (North, South and Strategic) and the next full Council meeting.

Yours sincerely

Michael Mahony

Cc

Rt Hon Dr Therese Coffey MP
Craig Rivett - East Suffolk Council
James Mallinder - East Suffolk Council
Tony Cooper - East Suffolk Council
Jocelyn Bond - East Suffolk Council
T J Haworth Culf - East Suffolk Council
Andrew Reid - Suffolk County Council
Russ Rainger – Suffolk County Council