



**Offshore Wind Farms**

**EAST ANGLIA ONE NORTH**

**PINS Ref: EN010077**

**and**

**EAST ANGLIA TWO**

**PINS Ref: EN010078**

**SEAS Response to  
NGESO and NGETS  
Answers TO ExQ1  
DEADLINE 2 – 17 November 2020**

**by**

**SEAS (Suffolk Energy Action Solutions)**

**Unique Ref. No. EA1(N): 2002 4494**

**Unique Ref. No. EA2: 2002 4496**



[info@suffolkenergyactionsolutions.co.uk](mailto:info@suffolkenergyactionsolutions.co.uk)

<https://www.suffolkenergyactionsolutions.co.uk/>

# SEAS Response to NGESO and NGETS ANSWERS TO ExQ1

SEAS would like to respond at Deadline 2 to:

1. [National Grid Electricity Transmission's \(NGET's\) response to the Examining Authority's \(ExA's\) First Written Questions](#), and
2. [National Grid Electricity System Operator's \(NGESO's\) response to the Examining Authority's \(ExA's\) First Written Questions](#)

From these two documents it is abundantly clear that National Grid, do not anticipate attending the Issue Specific Hearings in December, nor do they intend to fully answer questions about site selection and their future plans for grid connections at Friston.

These claims are evident in the following:

1. The covering letter attached to NGET's response to the ExA's First Written Questions: "*National Grid do not anticipate attendance at Issue Specific Hearings (ISH1 or ISH2) or the Compulsory Acquisition hearing (CAH1) ...*"
2. NGET's response to questions 1.0.16, 1.0.17, 1.6.1 and 1.14.1 in relation to site selection and further grid connections at Friston. We quote: "*NGET considers that the promoter is best placed to answer*", or the equally evasive, "*this is a question for NGESO ...*".
3. NGESO's dismissive response to the ExA's Written Questions: "*NGESO cannot comment on any unsigned connection agreements or any informal connection queries as this is commercially sensitive between the ESO and other parties*".

A lack of transparency from National Grid raises serious and urgent issues for the next stage of the Examination. SEAS would like to make the following recommendations.

## Recommendations

### 1. The scope of this Examination must be confirmed by National Grid and the Planning Inspectorate

On multiple occasions, community groups have put before the Examining Authority six additional projects with plans to connect to the grid at Friston; Nautilus, Eurolink, Galloper and Greater Gabbard Offshore Wind Farm Extensions, SCD1 and SCD2. Whilst the Examining Authority has repeatedly stated that all planned projects will be taken into account, National Grid has failed to answer the ExA's Written Questions on this subject. We are now in the incredible position of being over 6 weeks into the Examination but having no clear confirmation from National Grid or the Planning Inspectorate of the true extent of what the Examining Authority is examining.

I would like to draw your attention to [East Suffolk Council's and Suffolk County Council's Response to Examining Authority's First Round of Written Questions](#) in which they confirm, with reference to National Grid documents, that three of these projects; Nautilus, Eurolink and the Galloper Extension, are planned to connect to the Grid at Friston. A fourth project, the Gabbard Extension, is very likely to receive confirmation of connection to the grid at Friston very shortly.<sup>i</sup> Yet this information has been and still is the subject of conjecture and confusion which is preventing a full analysis of the cumulative impacts of these projects on the current Applications. SCD1 (and by default SCD2) are confirmed in the same document as making landfall at Sizewell but, as yet, no confirmation of location for a grid connection.<sup>ii</sup> <sup>iii</sup> Again more conjecture and confusion.

It is unacceptable, at this stage in the Examination to be second guessing the future plans of National Grid. The full extent of connection plans at Friston must be disclosed. Transparency is sacrosanct.

### 2. Issue Specific Hearings must be delayed

We know that the Planning Inspectorate and indeed multiple community groups have requested that National Grid attend the Issue Specific Hearings at the beginning of December 2020. If, as NGET have suggested, they do not attend, nor have they answered the ExA's Written Questions, then how can there be an informed examination around not only National Grid's future plans for grid

connections at Friston but also the reasons for selecting Friston as the location for the connection point to the National Grid.

The agenda for Issue Specific Hearing 1 includes, "the cumulative and in combination effects of onshore biodiversity". The agenda for Issue Specific Hearing 2 includes "onshore cable corridors and transmission connections" and "siting". If National Grid does not attend these relevant Issue Specific Hearings or answer the ExA's questions in full then a fair, open and thorough examination of these agenda items and others will be impossible.

SEAS are calling for these Issues Specific Hearings to be postponed until such time as the Planning Inspectorate has made the relevant information from National Grid publicly available.

## To Conclude

SEAS are respectfully calling for the Examining Authorities to enlist the support of the Secretary of State to then insist / summon / subpoena / or by whatever means, to get both NGENSO and NGET to answer the Examining Authority's Written Questions in full and attend all relevant Issue Specific Hearings or call a halt to the examinations until such time as this information is publicly available.

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<sup>i</sup> "The Councils are aware of the following grid connection proposals:

### **Nautilus and Eurolink Interconnectors**

**Nautilus Interconnector** – 1.4GW HVDC subsea electricity link between GB and Belgium – Developer is National Grid Ventures (NGV) – Expected operation date 2028. The project has a webpage on the National Grid website <https://www.nationalgrid.com/group/about-us/what-we-do/national-grid-ventures/interconnectors-connecting-cleaner-future/nautilus> . A Briefing Pack containing information on the Nautilus project is also available <https://www.nationalgrid.com/document/125601/download>

**Eurolink Interconnector** – 1.4GB HVDC subsea electricity link between GB and Netherlands – Developer is NGV.

It is known that the projects are considering a landfall point between Thorpeness and Sizewell and will require cabling to a converter station location and National Grid connection substation. A typical footprint for a converter station requires an area of five hectares with a maximum height of 24 metres. National Grid Electricity System Operator (NG-ESO) has provided grid connection offers for both Nautilus and Eurolink to a new 400kV substation located close to the Sizewell 400kV network.

The connection offer is identified on the Interconnector TEC register on the National Grid website <https://www.nationalgrideso.com/connections/registers-reports-and-guidance>. The point of connection is known to be the National Grid substation proposed under the EA1N and EA2 projects at Friston.

NGV has stated that for Nautilus and Eurolink to connect to the National Grid substation at Friston, the substation would require an extension for each project. NGV has confirmed that the maximum land take required to facilitate the extension is approximately 1.3 hectares for each connection offered <https://www.nationalgrid.com/document/132456/download>.

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### **Galloper Extension/Five Estuaries Offshore Windfarm**

Galloper Extension/Five Winds Offshore Windfarm – Capacity 353MW – Developer formerly Innogy now RWE – Round 3

In August 2019, the Crown Estate announced the conclusions of the Habitats Regulations Assessment (HRA) confirming that seven projects including the Galloper Extension project were granted development rights.

The National Grid TEC register of connections identifies a connection offer for the Galloper Extension project <https://www.nationalgrideso.com/connections/registers-reports-and-guidance> . An email sent from the developer to a Town Council in East Suffolk confirmed that the connection offer from NG-ESO relates to the substation proposed at Friston (See Appendix A of [ESC deadline submission](#) – copy pasted below)

Although there is limited information within the public domain on this project, it is considered that National Grid could provide an estimation for the footprint of the extension required to the National Grid substation to accommodate this project.

### **Greater Gabbard Extension/North Fall Offshore Wind Farm**

Greater Gabbard Extension/North Falls Offshore Wind Farm – Capacity – 504MW – Developed by SSE Renewables and RWE – Expected operational date 2030.

In August 2019, the Crown Estate announced the conclusions of the HRA confirming that the Greater Gabbard Extension project was granted development rights. It is understood that the Agreement for Lease has not also been signed.

At present there is no record of a connection offer on the National Grid connections register but a connection offer is anticipated shortly given that an Agreement for Lease has been signed and the website identifies that from 2020 project design work and community engagement will commence <https://www.northfallsoffshore.com/>."

#### **ii SCD1 and SCD2 Interconnectors**

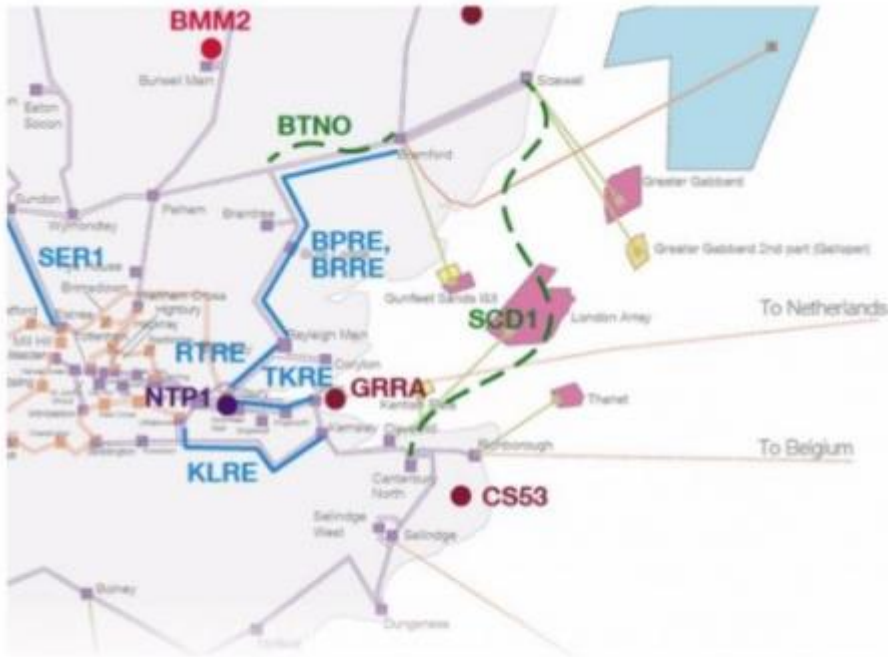
The NG-ESO Network Options Assessment January 2020 have recommended some network reinforcements as being necessary, including a subsea HVDC link between Sizewell and Canterbury <https://www.nationalgrideso.com/document/162356/download> Page 112

National Grid Electricity Transmission (NGET) has confirmed that they will be taking forward this reinforcement suggestion within their Network Policy Decisions June 2020 <https://www.nationalgrid.com/uk/electricity-transmission/document/134036/download>

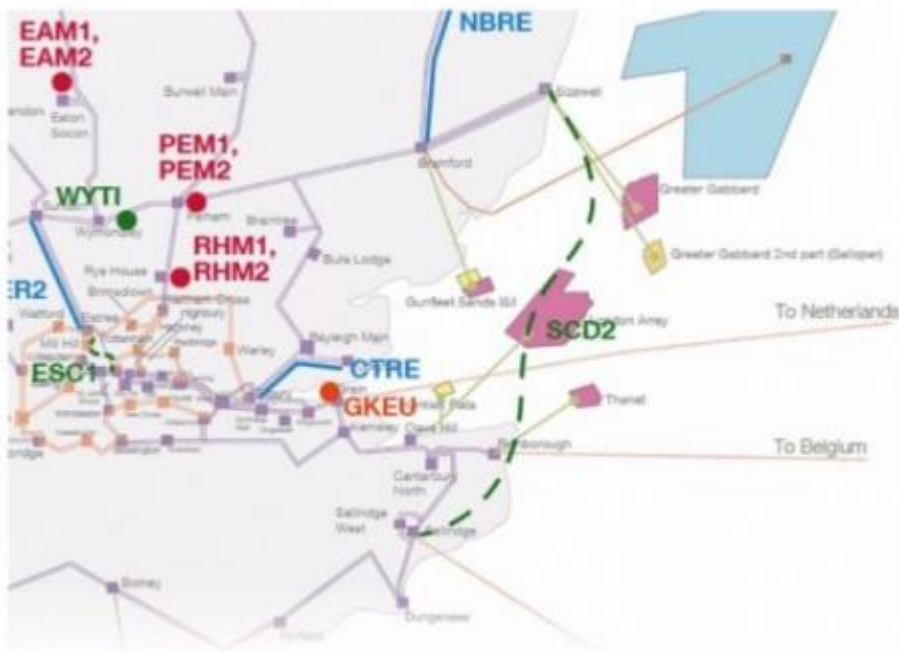
iii **A National Grid news gathering website Power Transmission** has details of SCD1 & SCD2 - <https://powertransmissiondistribution.co.uk/national-grid-project-news-projects-scd1-proposed-sizewell-to-canterbury-grid-interconnector-and-scd2-proposed-sizewell-to-sellindge-grid-interconnector/> See diagrams below

## **National Grid Project news Projects – SCD1 – Proposed Sizewell to Canterbury Grid Interconnector / and SCD2 – Proposed Sizewell to Sellindge Grid Interconnector**

National Grid post about the latest Projects – they have just announced two new 2GW HVDC Interconnector Projects – SCD1 – Proposed Sizewell to Canterbury Grid Interconnector / and SCD2 – Proposed Sizewell to Sellindge Grid Interconnector They will be connecting the Electricity Grid in the Sizewell area to existing Grid locations in Kent (Canterbury and Sellindge). The proposed routing of these Inter-connectors, referred to as SCD1 and SCD2 respectively is shown in the diagrams below. The planned completion date for SCD1 is 2028! These Interconnectors are to route part of the massive wind farm energy planned to be generated off the Suffolk Coast directly to London and the South-East , These Interconnectors will have Converter Stations up to 24m high and occupying at least 12 acres each in the same general area as substation equipment for the Nautilus, Eurolink and Scottish Power projects, as well as the expansion of Greater Gabbard and Galloper wind farms. And of course cabling from landfall to the Converter Stations will be required.



SCD1 – Proposed Sizewell to Canterbury Grid Interconnector



SCD2 – Proposed Sizewell to Sellindge Grid Interconnector



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Appendix A of ESC Submission – Deadline 1 <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002756-DL1%20-%20East%20Suffolk%20Council%20-%20Deadline%20Submission.pdf>

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Appendix A – E-mail between Innogy and Leiston Town Council regarding Galloper Extension Offshore Wind Farm

**From:** [REDACTED]  
**Sent:** 21 October 2019 15:04  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Galloper Extension Offshore Wind Farm update

Hello John,

Thanks for your prompt reply. This will certainly be treated as a project in its own right. Although it is at a very early stage we do expect to give it its own project name in due course and it will go through a separate planning process which will include public and statutory consultation on potential design options (which we expect to have in 2020). We do expect the project will require an onshore substation to be built. We currently have an offer from National Grid to connect in to Friston which we are considering but have not yet accepted and the offer is subject to consent being received for Scottish Power's DCO application for the East Anglia projects.

Our consents team are also contacting various other council officers with a view to ensuring they're engaged at an early stage in the discussions around the development.

I hope this is of some help. I'd be happy to call you or ask Tom to, if that is of further help?

Thanks

Rebecca

**Rebecca Neal**

**Public Relations Manager**

**Innogy Renewables UK Limited**