

29 November 2021

Rt Hon Kwasi Kwarteng MP
Secretary of State for Business Energy and Industrial Strategy
1 Victoria Street
London
SW1H 0ET

Dear Secretary of State

Re: Your forthcoming decision on the ScottishPower Renewables (SPR) EA1N and EA2 Offshore Wind Farms - information that has come to light subsequent to the Planning Inspectorate Examinations

I write as a resident of a village that would be affected by SPR's NSIP planning applications, primarily through construction of two onshore cable corridors that would bisect that village at its mid point. I am registered with PINS as an Interested Party with respect to both projects.

The Nautilus UK – Belgium Interconnector Project

Having observed the EA1N and EA2 Examinations' Hearings, I understand the Examination Authority was unable to fully consider the evidence for the combined onshore impact of EA1N and EA2 in combination with two continental interconnector projects (Nautilus and Eurolink) planned and being planned by National Grid Ventures (NGV). The relevant and extant National Policy Statements EN-1, EN-3 and EN-5 published in 2011 would not have anticipated the present situation where Developers can come forward with several carefully timed successive applications targeting the same onshore area, and submission of Scoping Reports timed for after a previous application impacting that area has been decided. I would hope BEIS is by now aware that the NSIP processes are not fit for purpose in this respect for National Programmes comprising multiple uncoordinated Projects.

Although the Planning Inspectorate Advice notes which deal with the PA2008 process are non-statutory, I believe both the Applicants and PINS have been guided by them. I refer in particular to the Planning Inspectorate's own National Infrastructure Planning - Advice Note Seventeen: Cumulative effects assessment dated August 2019 ¹.

However, the Overarching NPS for Energy (EN-1) paragraph 4.2.5 states that *'When considering cumulative effects, the ES should provide information on how the effects of the applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been sought or granted, as well as those already in existence'. For the purposes of this Advice Note Seventeen 'other existing development and/or approved development' is taken to include existing developments **and existing plans and projects that are 'reasonably foreseeable'**.*

NGV has released several updates to local communities and organisations over the past three years regarding its plans for Nautilus, including an 'Initial site Appraisal' Slide 5 of NGV's

Presentation on 14 December 2018 to Suffolk Coast & Heaths AONB Partnership Meeting ³ (enclosed).

According to the Minutes ² of a meeting with PINS on 21 October 2020, NGV stated then that it *'had a 1.5-Gigawatt connection agreement to connect to an as yet unconsented and unbuilt substation in proximity to the Sizewell 400Kv network'* and referred to a *'new NGET substation in this area currently being promoted through Scottish Power Renewables (SPR) : East Anglia 1 North (EA1N) and East Anglia 2 (EA2)'*.

I believe the 'Project location' for NGV Nautilus has been shown on the PINS Home page since Q2 2019 as Friston in East Suffolk, a Grid connection previously chosen by SPR for its EA1N and EA2 projects.

The SPR Applicants claimed at the EA1N and EA2 ExA Hearings that ended on 6 July 2021 that the NGV projects were insufficiently defined for them to include them in an EA1N/EA2 cumulative impact assessment. Interested Parties argued that sufficient information had been released by the Developer to demonstrate that the projects were intended to connect to the National Grid at Friston and would impact the same onshore areas as EA1N and EA2. The NGV Initial site Appraisal slide 5 ³ clearly illustrates that NGV had made public that it was seriously considering the route chosen by SPR from landfall to Friston **two years prior** to the SPR DCO submissions to Planning Inspectorate.

NGV recently (September 2021) released further detailed information on Nautilus in preparation for preliminary consultation events later that month with onshore communities likely to be affected.

Little new information of substance was released other than maps ^{4 5} illustrating options for onshore Converter Station sites and associated Cable Routes.

However NGV made it crystal clear during the consultation that plans for Nautilus (and later EuroLink) are dependent on SPR receiving consent for EA1N and or EA2 that would establish sufficient precedent for National Grid to build an East Anglia Coastal Substation (EACS) at Friston.

Cable Routes across B1122 Aldeburgh Road, Aldringham

National Grid Ventures has been carrying out surveys for its Nautilus and Eurolink Interconnectors along the same route as that proposed by SPR (referred to by NGV as Nautilus 'Southern Cable Route' ⁵ and is believed to be coordinating with SPR to build its haul roads and cables alongside EA1N and EA2, though not necessarily in the same time frame.

SPR stated in its application that the chosen crossing place on Aldeburgh Road is the only feasible place for a cable route to connect with substations at Friston, but failed to provide evidence to support that conclusion when challenged to do so at the Examinations.

In contrast, NGV put forward several alternative routes in its September 2021 documentation for consideration during public consultation. This is additional evidence of a serious shortcoming of SPR's Site and Route Selection.

My Conclusions

I believe the information I have provided above is further evidence that EA1N and EA2 Cumulative Impact has not been properly assessed and that SPR's Cable Route selection process was flawed.

The end result of this failure by SPR to assess Cumulative Impact could be very serious for my village of Aldringham should you approve the SPR project(s). My own personal 'cumulative impact' assessment of the SPR DCO submissions together with the information provided by NGV

on Nautilus informs me that the combined width of cable tranche devastation through the village of Aldringham would at least exceed the width of three motorways side by side. I would suspect that to be unprecedented on any other UK offshore energy route. My village would be progressively sliced into two by successive tranches of cabling and haul roads, with devastating consequences for its attractive woodland and river landscapes, ecology and last but not least the community.

Further, National Grid has evidently successfully avoided having to submit (or consult on) its own NSIP proposal for a major energy hub at Friston through exploiting government and Planning Inspectorate processes that did not anticipate a plethora of applications affecting one small area of the countryside. That just cannot be right or acceptable.

I should be grateful if you would take my comments above into account before finally deciding on whether or not to grant planning consent.

Yours sincerely

[Redacted signature]

W. R. Halford

Cc

Rt Hon Greg Hands MP – [Redacted]

Rt Hon Theresa Coffey MP – [Redacted]

Enclosures

1. Planning Inspectorate's own National Infrastructure Planning - Advice Note Seventeen: Cumulative effects assessment Published August 2019 (version 2).
[Redacted]

2. Minutes of a previous Planning Inspectorate (s51 Advice) meeting with National Grid Ventures (NGV) - 21 October 2020 - Project name Nautilus Interconnector
[Redacted]

3. Nautilus & Eurolink Interconnector Projects Presentation to Suffolk Coast & Heaths AONB Partnership Meeting 14 December 2018
See Slide 5 of Slide Presentation (.pdf representation) enclosed

4. Nautilus Interconnector (National Grid Ventures) Non-statutory consultation September 2021
[Redacted]

5. Nautilus Interconnector (National Grid Ventures) 'Southern Cable Route' - refer to Figure 2
[Redacted]

Nautilus & Eurolink Interconnector Projects

nationalgrid
ventures

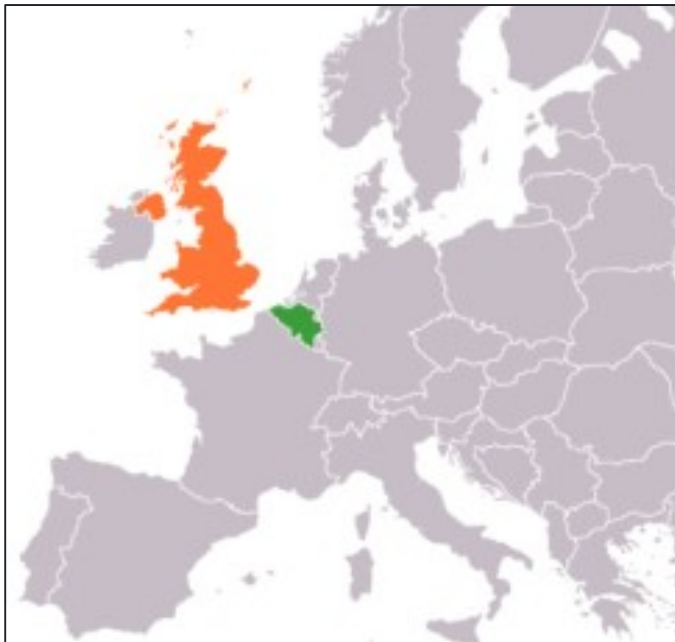


14th December 2018

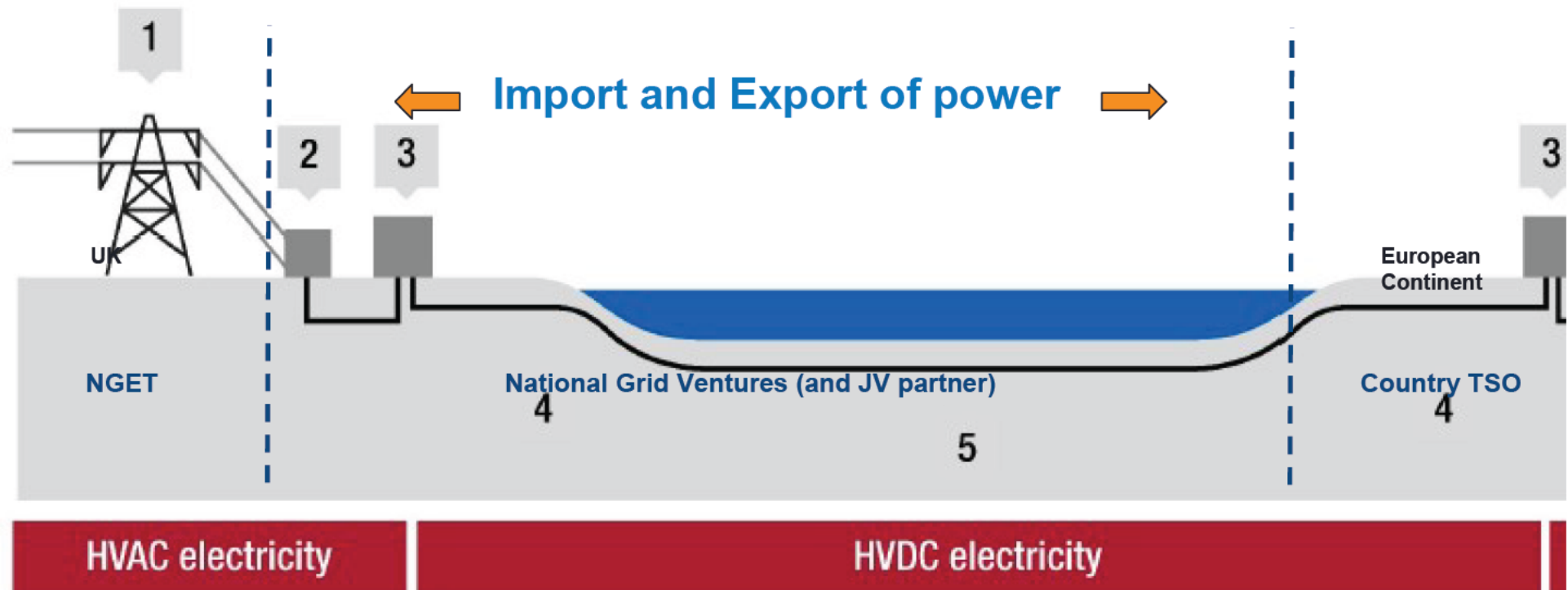
Presentation to Suffolk Coast & Heaths AONB Partnership Meeting

Overview

- What are Interconnectors?
- Project update for Nautilus & Eurolink
- Work to date



What are Interconnectors?



Convertor station required for each project: Up to 5ha in size Building height up to 24m

Cable landfall required for each project Up to 200m wide application area per project

Cable easement of approximately 15m for each project

- Approximately 30m working width for cable installation but dependant on AC or DC and proximity to other infrastructure

Project update for Nautilus & Eurolink

Nautilus Interconnector (UK-BE):

- Proposed second Interconnector to Belgium – 1.4GW by 2028
- Project delay necessary to accommodate substantial upgrades needed to Belgium network (originally planned for 2025)
- Final Investment Decision on project scheduled for late 2023
- Planning submission planned for late 2022

Eurolink Interconnector (UK-NED):

- Proposed second link to the Netherlands – 1.4GW by 2030
- Project is less developed in status due to discussion on project type
- Interconnector / hybrid - Windconnector
- Planning submission date to be confirmed

Work to date

- Key activity is to identify & secure a convertor station site & cable route
- Ongoing dialogue with SPR, EDF, NGET, Suffolk Coastal and Suffolk County Council as well as BEIS
- Appointed consultants to undertake site options appraisal
- Desk based assessment and initial site walk over complete
- Engineering and construction appraisal being completed in parallel and expected to conclude end 2018 early 2019
- Engagement and meetings with principal stakeholder groups likely to commence in the New Year to work on identifying convertor station sites and cable routes for consultation

Initial site Appraisal



Questions?