

From: [REDACTED]
To: [East Anglia ONE North](#)
Subject: Written Representation EA1N October 2020
Date: 28 October 2020 20:58:13
Attachments: [Written Representation EA1N October 2020 FINAL.pdf](#)

Dear Sirs,

Application by East Anglia ONE North Limited for an Order Granting Development Consent for the East Anglia ONE North Offshore Wind Farm (the “Application”)

Reference number 20024824

I write in response to your request for Written Representations regarding the Application.

Yours faithfully,

Sybella Zisman

Sybella Zisman

[REDACTED]
[REDACTED]

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29th October, 2020

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Sirs

Re: Application by East Anglia ONE North Limited for an Order Granting Development Consent for the East Anglia ONE North Offshore Wind Farm (the “Application”)

I am writing as a resident of Friston village and a registered interested party in response to the request for Written Representations in respect of the Application.

I am entirely supportive of the Government’s objective as set out in the Offshore Wind Sector Deal published on 7th March, 2019 that one third of British electricity should be produced by offshore wind power by 2030. The Government’s ambition to make the UK a global leader in renewables with more investment potential than any other country in the world as part of the Industrial Strategy is highly commendable.

It is ironic that the Government’s admirable renewables energy strategy with the aim of protecting the world for future generations is being implemented by the commercial operators, Scottish Power Renewables (SPR) and National Grid, through the destruction of a fragile rural landscape, its communities and their livelihoods, all of which should be retained for the benefit of future generations.

This Written Representation concentrates on three areas:

- the approach taken to site selection for the onshore substation(s) is flawed. Had the Applicant properly conducted the site selection process, a different site (or alternative solution) with significantly less severe environmental and socio-economic impacts may have been selected;

- the Applicant has failed to mention the reasonable alternative to the proposed development that it has investigated, namely offshore transmission structures which could result in significantly less environmental and socio-economic impacts; and
- the findings of the cumulative impact assessment are incorrect due to the Applicant's assessment failing to consider other relevant developments which, based on information in the public domain, are reasonably likely to come forward.

Site Selection

The Inspectors have noted on several occasions in the Preliminary Meeting and the Open Floor Hearings the question of the Bawsey to Bramford cable route, and its final capacity.

The Development Consent Order (“DCO”) for the East Anglia One (“EA1”) wind farm granted on 17th June 2014 provided for the construction of a 1.2GW wind farm and a cable route to transmit the electricity generated by this wind farm from the coastal landing point at Bawsey to the pre-existing National Grid substation site at Bramford by HVDC (High Voltage Direct Current) cable (attached). As PINS will be aware, this consent was given on condition that the proposed cable route, in order to minimise disruption to the landscape, would accommodate 3.6GW of power i.e. not only the EA1 wind farm but the Applicant's other proposed wind farm developments (Document 1 attached).

Subsequently, the Applicant, however, only won 714MW of financial support in the Crown Estates Contract for Difference (“CfD”) auction. The consequence of this was that the original 1.2GW EA1 wind farm would not have been financially viable as approximately half of the power generated would not have had a guaranteed subsidy available in the event that the wholesale price for the power generated fell below the floor price set out in the CfD.

In order to address this financial issue, the Applicant applied to amend the DCO for EA1 to reduce the capacity to a 714MW farm and change the transmission technology for the Bawdsey to Bramford cable route from HVDC (High Voltage Direct Current) to cheaper HVAC (High Voltage Alternating Current). These amendments, described as “non-material” by the Applicant, were granted in March 2016 (Document 2 attached).

However, the HVAC technology requires double the number of cables to HVDC. Therefore, the cables for the EA1 wind farm occupy 2/3rds of the width of the Bawdsey to Bramford cable trench, not 1/3rd of the width as originally envisaged in the DCO granted in 2014. The amendment in respect of the cabling technology, therefore, had the consequence of significantly reducing the capacity of the Bawsey to Bramford cable route so that it could not be used to take the cables for the Applicant's other proposed wind farm developments, as originally envisaged by PINS in the 2014 DCO.

This reduced trench capacity resulted in September 2017 in National Grid reviewing the connection options for EA1N and EA2 and deciding that the connection point for these substations would be in the vicinity of Sizewell/Leiston.

The Inspectors noted in the Open Floor Hearings in October 2020 that they would ask the Applicant to confirm the final capacity of the Bawdsey to Bramford cable route. I would suggest that the Inspectors might also wish to consider whether:

1. The Applicant made sufficient disclosure of the impact of the change from HVDC to HVAC technology in its application to amend the 2014 DCO on:
 - a. the required allocation of the cable trench to cables for the EA1 wind farm; and
 - b. the consequential reduction in the capacity of the cable trench to accommodate the cables for subsequent wind farms.

In this context, I would note that the minutes of a meeting between the Applicant and the Planning Inspectorate in July 2016 (Document 3 attached) record that because "The alternative (AC) technology will require a greater width of cable corridor than was previously anticipated. This means that, at certain locations, it will not be practicable to install ducting for all future projects" and that "Therefore, the Applicant will be looking in some locations for a new routing strategy for the EA1N and EA2 projects". However, the minutes continue: "The Applicant confirmed.....the EA1N and EA2 projects intend....to follow the same offshore and onshore grid connection route and connect to the National Grid at Bramford".

2. The Secretary of State was properly informed by the Applicant of the impact of the proposed changes to the 2014 DCO and the consequent harm that would arise from the changes, and so had the information to assess whether there was a compelling case in the public interest to grant consent to the

changes. No decision maker could lawfully carry out the necessary balancing exercise to come to a decision when relying on of a flawed evidence base, and the Secretary of State could not therefore lawfully approve to the changes to the 2014 DCO.

3. The Applicant has properly investigated:
 - a. expanding the existing Bawdsey to Bramford cable trench; and
 - b. laying a second cable trench one parallel to the firstso that the terms of the 2014 DCO could be implemented as originally envisaged when consent was given.

Reasonable Alternative

The Application for a massive development of substations at Friston conflicts with the prevailing view as to best practice for the delivery of power from offshore windfarms into the electricity grid.

- Department for Business, Energy and Industrial Strategy (“BEIS”)
 - In the Offshore Wind Sector Deal set out as part of the Industrial Strategy in March 2019, BEIS stated that target of 30GW from offshore wind should be delivered in a sustainable manner, including “to ensure that deployment out to 2030 can be delivered in a sustainable and timely way, that impacts on other users of the sea space are acceptable, that impacts of transmission infrastructure onshore and offshore are acceptable” (Page 28) (Document 4 attached).
 - On 15th July, 2020, BEIS announced an Offshore Transmission Network Review (Document 5 attached)
- National Grid
 - National Grid announced on 30th September, 2020 a report stating that “multi-purpose interconnectors (MPIs) could help Great Britain unlock the potential of offshore wind” i.e. an offshore transmission infrastructure (Document 6 attached).
- National Grid Electricity System Operator (“National Grid ESO”)
 - Also on 30th September, 2020 National Grid ESO issued a consultation document on offshore transmission network (Document 7 attached).

- The important document is Annex 2 – the Cost Benefit Ratio calculated according to the Treasury Green Book requirements. This indicates on Page 12 under section 2.7.2.1 that the CAPEX of an integrated design for the whole of the UK offshore network is 19% lower than that of the Counterfactual i.e. the individual substation model, and that the capital expenditure required in the eastern regions is 30% lower.
- SSE Report
 - In July 2020, SSE Renewables issued a report setting out a roadmap for the UK to reach its target of 40GW of offshore wind by 2030. SSE Renewables is a leading developer and operator of renewable energy across the UK and Ireland.
 - SSE Renewables advocates ‘a more efficient approach to development of the grid infrastructure needed to integrate offshore wind into the electricity system’ and for the UK to ‘collaborate closely with other North Seas countries on the development of a meshed North Sea grid’ (Document 8 attached).

Existing projects and available proven technologies implemented elsewhere in the North Sea (for example in the German BorWin 3 and DolWin 3 projects) prove that it is feasible to build an offshore hub capable of collecting all the power from the different wind farms off the East Anglian coast and then connecting it to the grid on the shore at a single point, either an existing substation site or a new substation on brownfield land. This connection should be done through a HVDC cable, one section submarine and the other one underground, minimizing the impacts to the landscape. The location of both the hub and the onshore converter station will depend on the characteristics of the seafloor for the hub and the technical assessment the most appropriate insertion point to the grid.

The Applicant should be required to revisit its approach to a scheme design striking the correct balance between commercial and environmental considerations. Such an alternative scheme as outlined above would strike the correct balance between commercial and environmental considerations, and be a well-conceived scheme in the public interest.

It is possible to speculate that the Applicant is relentlessly pursuing the development of substations for EA1N and EA2 at Friston because the Applicant has placed its own commercial interests to develop these onshore connections at

the lowest cost to the Applicant above those of the public interest. It is possible further to speculate that this return for the Spanish shareholders of the Applicant may be crystallised through the sale of the completed development by the Applicant within the next few years.

In effect this project is a massive transfer of value from the inhabitants and businesses of rural East Suffolk to Spanish financial investors through the destruction of a fragile rural landscape, its communities and their livelihoods.

Cumulative Impact

In the Open Floor Hearings in October 2020 the Inspectors requested further details on the other substations and convertors which, based on publicly available information, are reasonably expected to be sited adjacent to the Applicant's onshore infrastructure for EA1N and EA2 at Friston.

The six additional projects are the Nautilus HVDC Interconnector with Belgium, the Eurolink HVDC Interconnector with the Netherlands, the expanded Greater Gabbard and Galloper windfarms, SCD 1 and SCD 2.

Information in the public domain on these projects include:

- National Grid has already indicated that the “ESO have provided grid connection offers (for both Nautilus and EuroLink) to a new 400 kilovolts (kV) substation located close to the Sizewell 400kV network, provisionally referred to as ‘Leiston 400kV’. This substation is more locally known as the proposed NGET substation in Friston.” (Document 9 attached).
- Local landowners have been contacted by National Grid Ventures regarding a preliminary walk-over survey for these installations.
- National Grid ESO stated that all the projects listed above including the SCD1 and SCD2 substations will be at Friston, and that more cable will be laid through AONB land - “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.....cabling from landfall to the Converter Stations will be required” (Document 10 attached).

The Applicant's application gives inadequate consideration to the cumulative impacts of these other developments proposed at Friston. The cumulative impact

has been considered by the Applicant only in the context of the proposed EA1N project and the proposed EA2 project. This is an inadequate and flawed approach given the substantial body of information in the public domain on the other six onshore infrastructure projects planned to be sited at Friston.

The Inspectors noted in the Open Floor Hearings in October 2020 that they would consider the cumulative impact of all the onshore infrastructure projects planned at Friston on the basis of the public information available at the time to the enquiry: “If we failed to do so, the process would be distinctly awry, and it will not be that awry”.

Conclusion

I formally object to the DCO applications made by the Applicant for EA1N and EA2 and recommend that these DCO applications should be refused.

By rejecting these DCO applications, the Inspectors will provide the time for the Applicant and National Grid to develop more appropriate plans in an open and transparent way. It will enable the conclusions of the BEIS review to be taken into account and experts to develop enlightened plans fit for the future, involving offshore infrastructure to be connected to the grid at existing onshore connection points or to more appropriate brownfield sites, such as Bradwell in Essex as advocated by The Rt Hon Therese Coffey, MP for Suffolk Coastal in her Relevant Representation, received by the Planning Inspectorate on 27 January 2020 (Document 11 attached).

This would align entirely with the Government’s stated policy in the Offshore Wind Sector deal of March 2020 “to ensure that deployment out to 2030 can be delivered in a sustainable and timely way, that impacts on other users of the sea space are acceptable, that impacts of transmission infrastructure onshore and offshore are acceptable”.

For the Inspectors to take any other decision would result in this process, in the Inspectors’ own words, being “awry”.

Yours faithfully,

A black rectangular box redacting the signature of Sybella Zisman.

Sybella Zisman

Document List for Sybella Zisman Written Representation 29th October 2020

Document 1 - The Development Consent Order (“DCO”) for the East Anglia One (EA1) wind farm granted on 17th June 2014

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010025/EN010025-000002-East%20Anglia%20One%20Development%20Consent%20Order.pdf>

Document 2 - Application for Non-Material Change to East Anglia One Offshore Windfarm Order – Decision Letter 24th March 2016

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010025/EN010025-000044-East%20Anglia%20One%20Change%20request%20%20Decision%20Letter.pdf>

Document 3 - Minutes of meeting between the Applicant and the Planning Inspectorate in July 2016

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-Advice-00005-1-160706_EN010077_EN010078_Project%20update%20meeting%20for%20East%20Anglia%20ONE%20North%20and%20East%20Anglia%20TWO.pdf

Document 4 – Offshore Wind Sector Deal – March 2019

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/790950/BEIS_Offshore_Wind_Single_Pages_web_optimised.pdf

Document 5 - BEIS Offshore Transmission Network Review - July, 2020

(<https://www.gov.uk/government/publications/offshore-transmission-network-review>).

Document 6 - National Grid a report on MPIs - September, 2020

<https://www.nationalgrid.com/document/134211/download>

Document 7 –National Grid Electricity System Operator (“National Grid ESO”) consultation document on offshore transmission network - September, 2020

- Summary - <https://www.nationalgrideso.com/document/177296/download>
- Full document - <https://www.nationalgrideso.com/future-energy/projects/offshore-coordination-project/documents>.
- Annex 2 – Cost Benefit Ratio
<https://www.nationalgrideso.com/document/177226/download>.

Document 8 – SSE report – Delivering 40GW of Offshore Wind by 2030
<https://www.sse.com/media/dotp5quh/delivering-40gw-of-offshore-wind-by-2030.pdf>

Document 9 – National Grid grid connection offers both Nautilus and EuroLink
<https://www.nationalgrid.com/document/132456/download>

Document 10 - National Grid ESO proposed connection for SCD1 and SCD2
Friston reported by Power Transmission Distribution – March 2020
<https://powertransmissiondistribution.co.uk/national-grid-project-news-projects-scd1-proposed-sizewell-to-canterbury-grid-interconnector-and-scd2-proposed-sizewell-to-sellindge-grid-interconnector/>

Document 11 - Relevant Representation of The Rt Hon Therese Coffey, MP for
Suffolk Coastal January 2020.
<https://www.theresecoffey.co.uk/sites/www.theresecoffey.co.uk/files/2020-01/DCO%20SPR%20EA1N%20EA2%20Wind%20Farms%20PINS%2027.01.20.pdf>