

From: [REDACTED]
To: [East Anglia Two](#)
Subject: Written Representation
Date: 02 November 2020 23:26:39

WRITTEN REPRESENTATION RELATING TO THE APPLICATIONS BY SCOTTISH POWER RENEWABLES (SPR) FOR CONSENT TO DEVELOP EAST ANGLIA ONE NORTH (EA1N) AND EAST ANGLIA TWO (EA2). IT REFERS TO THE ONSHORE ELEMENTS OF THE APPLICATIONS

My registration identification number for EA1N - 20024805

My registration identification number for EA2 - 20024807

Summary

1. Public consultations that informed the applications were misleading
2. Failure to provide a comprehensive assessment of the cumulative effects (CEA)
3. National Grid (NG) manipulating the planning laws thus undermining the process
4. A new precedent would be set for onshore infrastructure setting the bar unacceptably low
5. Inadequate site selection assessment
6. Failure to plan for the future
7. Conclusion

1. The public consultations that informed these applications were misleading

During the public consultations it was acknowledged by SPR that their applications for EA1N & EA2 included a provision for the construction of NG substation to connect them to the grid. Not made clear to the public were the wider implications of the new NG station should these applications be consented, even though other projects were already being proposed for the area. The ability of National Grid to embed this new connection point in another company's DCO thereby creating an enormous energy hub in a rural area without proper scrutiny or discussion brings into question the fairness and credibility of the planning system for NSIPS.

2. Failure to provide a comprehensive assessment of the cumulative effect (CEA) of other developments within the area

In December 2018 National Grid Ventures (NGV) gave a presentation to Suffolk Coast & Heaths AONB in which they set out their proposals for its Nautilus and Eurolink Interconnector projects. In that presentation NGV acknowledged that they were in ongoing dialogue with, amongst others, SPR, EDF and NGET. It was clear from the presentation that NGV intended to follow as closely as possible the SPR route from landfall to the NG station at Friston. In the new year meetings began with other stakeholders during which NGV conceded that, should the SPR projects be consented, their own

projects would connect at the new national grid station at Friston. SPR evaded questions about this during the Stage 4 consultations in early 2019. When pressed at a meeting in the neighbouring village of Snape to explain why they were not including the NGV projects in their cumulative impact assessment their response was that they didn't have to; they did not consider NGV's plans to be sufficiently advanced. In their applications SPR have failed to provide an adequate and detailed CEA relating to either NG's Nautilus project or EDF's Sizewell C project, both of which were in Tier 2 of PINS hierarchy of certainty at the time of submission. Nor has any meaningful attempt been made to include in the CEA known Tier 3 projects including the Eurolink Interconnector, and the expansion of the Galloper extension (renamed Five Estuaries) and Greater Gabbard extension (renamed North Falls).

3. No public consultation or scrutiny of National Grid's proposals for a new connection point

In February 2020 two new Interconnector projects, SCD1 and SCD2, appeared in a National Grid Network Options Assessment making a total of 8 projects proposed for connection at Friston. Posts issued at the time make clear National Grid's intentions.

<https://powertransmissiondistribution.co.uk/national-grid-project-news-projects-scd1-proposed-sizewell-to-canterbury-grid-interconnector-and-scd2-proposed-sizewell-to-sellindge-grid-interconnector/>

Even before this announcement an East Suffolk council meeting in January 2020 concluded that:

'the National Grid substation proposed within the SPR applications is being seen by National Grid as a strategic connection point for future projects without the potential impacts being cumulatively assessed and without any of this future development being considered within the existing master plan for the site'.

The SPR applications are in effect a Trojan horse for future massive infrastructure that would:

- cover over 100 acres of our rural countryside in substations
- require the Suffolk Coast & Heaths AONB to be dug up multiple times for 32 metre wide cable trenches (the average UK motorway is 33 metres) plus a 10 metre wide haul road running alongside from individual landfall sites on the coast to the substations 10 km away
- overwhelm a tranquil rural village bounded by green fields, ancient hedgerows, protected sites, country footpaths
- all without public consultation

National Grid has failed to engage with the campaign groups throughout this process. Documents disclosed under Freedom Of Information powers have been so heavily redacted as to be meaningless. This has left communities with the sense that National Grid, both gamekeeper and poacher, is manipulating the planning system for their own ends. Should these SPR applications containing the National Grid substation be consented then National Grid will be judged to have succeeded, undermining public confidence in the fairness of the planning system.

4. A new precedent would be set for onshore infrastructure setting the bar unacceptably low for all future development

If each developer is required to make their own application for each project

then NG should have submitted a separate application to build its connector station rather than embedding it in SPR's applications. Alternatively NG should have been a joint applicant in the SPR applications in the interest of openness and fairness. This matters because if these SPR applications are approved, it will mean that all objections to these applications will have been rejected, at which point it's hard to see how any of these future projects could be turned down. It's not just the Friston community that is dismayed at this prospect. If energy infrastructure on this scale can be built just 300 metres from the village boundary of Friston, a quiet, attractive, rural village with no previous industrial development, on the edge of an AONB which will be devastated by multiple landfall sites and cable trenches, then the bar for planning consent will have been set so low that no rural village or AONB is safe. This is of enormous concern to all the villages within a 6 mile radius of the National Grid sub-station such as Sternfield, Benhall, and Snape, home of the internationally renowned music venue, Snape Maltings. When available land around Friston runs out, any one of them could be targeted. This should, though, be of concern to all of England's rural communities and all of England's AONBs and SSSIs because these applications are unique in the scale of their adverse impact on local residents, on the landscape and environment, and on the area's main economy, tourism. The visual impact would be inescapable and the damage permanent.

5. Inadequate site selection report

SPR has failed in its applications to provide an adequate site selection report setting out what alternative sites and transmission routes have been considered, with detailed reasons for rejecting each alternative in favour of the selected site. Nor has there been any meaningful attempt to identify a brownfield site. SPR has also never provided an acceptable explanation for its arbitrary and sudden decision to downgrade and abandon the Bawdsey to Bramford route already permitted for EA1N and which had the capacity to carry EA2. Bramford is the site of an existing National Grid power complex close to a large urban population and other industrial infrastructure. It's hard to understand why this route was abandoned when the implication was that a new National Grid substation would have to be built to connect EA1N & EA2 to the grid, and a new site for these projects would require yet more cable routes to be excavated across the AONB from new landfall sites causing further environmental damage.

6. Failure by National Grid and SPR to plan for the future

At the end of 2011 OFGEM commissioned a report into Offshore Transmission Co-ordination which advanced many benefits, both economic and environmental, of an Integrated Offshore approach. However, in 2015 National Grid published its own report in which it concluded that the target of 17.2 GW of offshore wind being operational by 2030, on which the OFGEM report was based, was unrealistic. Taking 10 GW as a more likely scenario for offshore wind generation in the timeframe being considered, it concluded it would be neither economic nor efficient to progress with the development of an integrated design philosophy. They were aided in their research for the East Anglia zone by SPR and by Vattenfall, one of the energy companies currently laying waste to Norfolk. 4 years later that target had almost doubled to 30GW and the current government is now suggesting a 40GW target. One of the striking things about this NG report is the lack of regard for the environmental consequences of continuing to pursue a non-integrated design

in order that both National Grid and the offshore generation developers could maintain control over the scope and programme of their individual works and their profits. The lack of foresight has also resulted in the UK being at least 10 years behind its European neighbours in the efficient and environmentally sensitive delivery of offshore wind. Onshore coastal communities and their rural hinterland are now being asked to pay the price.

In a statement accompanying its current Offshore Transmission network review which is due to report at the end of 2020, the Government acknowledged that ‘constructing individual point to point connections for each offshore wind farm may not provide the most efficient approach and could be a major barrier to delivery given the considerable environment and local impacts, particularly from the associated onshore infrastructure’. And yet SPR is pushing on regardless either because it believes any changes will come too late to affect its applications and/or because it believes that the national demand for wind energy overrides all objections. While our communities are all in favour of offshore wind, it should not be at any price.

Conclusion

The terms of reference for the government's Offshore Transmission Network Review indicate it will ‘focus on identifying tactical near-term actions that can be taken, and early opportunities for coordination for projects in the short to medium term. (NGV has already announced that, subject to changes to the current system, it would make their Nautilus and Eurolink projects Multi Purpose Interconnectors. This means they would be able to collect the power from offshore wind farms and bring it ashore via their own cables.) As the earliest possible start dates for construction of EA2 and EA1N are, according to SPR’s project website, 2024 and 2025 respectively, these projects would appear to fall into the short-to-medium term category as they are unlikely to be producing power until 2030. This means there is scope for SPR to amend its offshore connection proposals, and to identify a more suitable onshore site.

There are alternatives. The Rt Hon Therese Coffey MP, amongst others, have long suggested the disused energy site at Bradwell. The existing infrastructure could be easily upgraded and its coastal position would mean less damage to the environment. The Bramford site could also be revisited. Brownfield sites should also be explored.

When National Grid announced in 2017 that it had reviewed the connection point for EA1N & EA2 and that instead of Bramford these projects would connect in the vicinity of Sizewell/Leiston the logic for this choice might have been the existing power lines. Indeed at the public consultations SPR said that this was the only connection point they were offered when they abandoned Bramford. However, it is becoming increasingly clear that a new parallel row of pylons may have to be built alongside the existing ones from Friston to Bramford. At which point there is no longer an imperative for SPR's substations and its new National Grid connection point to be built at Friston, in which case a more suitable site, preferably one which doesn't impinge on the AONB could, and should, be found.

For all these reasons, and for the many environmental objections that have been raised by other interested parties in their representations, I would urge the Examining Authority to recommend that the Secretary of State rejects both applications in their present form.

Victoria Hambley