

Submissions on behalf of Beach View Holiday Park

Prepared by Nicholas Thorp

East Anglia One North IP 20024928

East Anglia Two IP 20024929

Issue Specific Hearing 2 (2nd - 3rd December 2020)

EA1N & EA2 DCO Examinations

Dear Mr Smith and Examining Team,

Sir in response to ISH 2 we concur & endorse contributions of Graeme Keen QC - SASES (Item2 A-C, D & E / 3 A-C / 4 A&B) particularly on planning policy and regulations surrounding issues of interactions with existing and foreseeable projects, accumulation of development and perceived ability of SPR to make and provide meaningful assessments on the design, location and impact of substations and connection infrastructure.

Likewise contributions from Councillor Marianne Fellows (ISH2 Items 2C,D,E / 3 A-C / 4A&B) & Fiona Gilmore SEAS (ISH 2 C,D,E / 3 A-C / 4A&B) on all issues, particularly the issue of the nature of the National Grid substation as a 'strategic connection point' and the fact that it is the 'foremost feature' of these DCOs.

In respect of 2 C we would add:

- The Crown Estate, like National Grid, are a driver of energy development in coastal areas. Round 4 auctions highlight a lack of responsibility from the very top of the offshore energy development chain. There is urgent need for better acknowledgement of the 'onshore' effects of offshore wind development along our coastline, especially in vulnerable places such as here in Suffolk where we have an AONB that is now under threat.

In respect of 2 D & E

- EA1N & EA2 are SPRs DCOs, however the overarching issue with EA1N & EA2 DCOs seems to be that National Grid does not already have suitable existing infrastructure in the vicinity, and that National Grids substation represents more than just a means for EA1N & EA2 to connect to the grid.
- The make-up of National Grid and its subsidiaries appears to provide NG the means to ignore its own requirements of CION, and then NPS EN1 & EN3 and other planning policy regarding NSIPs & DCO requirements.

We are not experts in these processes, or of the exact requirements for NSIP DCOs, but National Grid seems to be able to proceed with a view the NG Substation can pre-empt planning consent:

- Does National Grids position and lack of accountability strategically benefit NG or its subsidiary companies? While National Grid are network operator, they are also a commercial entity.

How has National Grids approach to providing a connection offer met with CION Process Guidance Note V4.0 Issue 004 – November 2018 Sections 2+3?

National Grid companies are set to benefit from decisions that don't seem in the spirit of CION: *"...transparent, repeatable and non-discriminatory process to ensure all relevant developers are treated in a consistent manner."*

- In light of discussion about Bawdsey to Bramford and the available capacity at Bramfords existing infrastructure it remains unclear how CION dismissed this existing connection point as not the most "economic, efficient and coordinated connection option".

NGs assessment that EA1N & EA2 should require a new connection point, will ultimately benefit NG & NG's subsidiaries to the detriment of our AONB, communities, businesses. It seems vital that CION assessments can be made available for scrutiny to understand the where, why & how, in the context that both parties had grid infrastructure and land at Bramford.

Sizewell C & cumulative impact

Sizewell C will have huge impacts on the AONB & coast but also on communities & businesses and how they will be able to, or not, go about daily life. If EA1N & EA2 are consented as well, how can developers seriously propose adequate mitigation if there is not full understanding of one another's impact?

- SPR appear unable to accurately assess cumulative impact between their own 2 DCOs, let alone cumulative impact with Sizewell C, or with other projects (North Falls & Five Estuaries Windfarms, Nautilus and others).
- We do not accept Mr Pizzolla & Mr Innes (SPR applicants) assertion that they are unable to square cumulative impact issues by carrying out necessary impact assessments, as it would be a "speculative task" because many of the other projects referred to have already registered with PINS.
- The **unbuilt** NG Substation, Friston has already become a magnet for more connections and associated infrastructure. These concerns are effectively confirmed because National Grid has provided connection offers to other projects which include NG Ventures and NGET.

NG Ventures contracts consent officer has even put requests on record for future proofing of the NG substation for Nautilus & Eurolink in their [submission to PINS 9/3/2020](#) : *"...NGV are seeking to ensure the substation is future proofed for other future developments, namely the proposed Nautilus and Eurolink Interconnector projects."*

Beach View Holiday Park is a tourism business sandwiched between the Sizewell site to the north and EA1N & EA2 cable landing zone to the south. All these proposals threaten accessibility to our business and our business viability & sustainability, if people decide not to visit or stay with us.

- We have seen nothing in SPRs proposals or Sizewell Cs proposals to help offset the damage they could do to our family's business (4 households' livelihoods), or damage to other tourism businesses nearby.
- SPR have made poor assessment of the impacts on tourism. What mitigation is being put forward to assist a business like ours? **(We would like to be able to put this to SPR when Socio-economic issues are developed further)**

NGESO Offshore Coordination Projects and BEIS OTN Review

As a local tourism business, it is vitally important for us that decisions by BEIS and development of their OTN Review can be integrated with NGESOs emerging research on co-ordination, standardisation, shared facilities and offshore connection hubs. However it cannot be at the expense of this locality. The impact of the current approach and what is coming out of these reviews could actually mean the AONB could face years of damage with multiple threats from each and every project that National Grid directs to this area:

- Especially if a NG substation is consented with these DCOs and built prior to implementing things like greater co-ordination, share facilities/hubs.

So, we would repeat calls for a pause so a least damaging solution can be explored first before either or both of these DCOs proceed.

In respect of Item 3 A – C

We agree strongly agree with Marianne Fellows, Fiona Gilmore and Richard Reeves, that it is not possible for the applicant to have their cake and eat it in terms of technology and processes.

Just as Friston is not an appropriate location for a National Grid substation. Thorpeness is not a suitable location for a cable landing point due to soft sand cliffs and eroding beach where any construction work will have an impact on the cliffs.

The lack of adequate 'on the ground' surveying & assessment glaringly exposes failure of SPR to perform due diligence this is true when you assess the chosen location with clumped siting of substations. And the developer's confusion as to technologies that will be used for construction.

Given the acknowledgement made by Theologos Dimitriadis (SPR)

- that SPR may not even commit to HDD cables at Thorpeness. With a final decision unlikely until quarter 3 2021.

Why are we at this point engaging with examination if the DCOs construction work could change fundamentally post examination? If Key assessments will not be ready until much later on, quarter 3 2021, how should we feel about other aspects of these examinations that might be completely different post examination.

In respect of Item 4 A & B

We again endorse contributions made by East Suffolk Council, Michelle Bolger (SASES), and would just add that we do not feel the developer has shown a large enough sympathy towards integrating design features and mitigation effort to try and minimise the impact of the proposed development.

As a last comment it seems more vital than ever for National Grids infrastructure (substation and connection point) to undergo its own DCO application process, so that National Grid and the NG substation can be fully examined and scrutinised:

- NG needs to carry out its own competent site appraisals and selection process.
- NG needs to commit to 'proper' rounds of statutory consultation with stakeholders and the public.
- NG needs to be available to answer questions about an NG substation and what it means for this area if at Friston or elsewhere close by.

Of course, given this opportunity it may be that National Grid realise a substation located here is not suitable and an alternative location is found. A location that does not represent the prospect of a succession of cables landing along the Suffolk Coast, all requiring cable routes criss-crossing the AONB. A better alternative could ensure the EA1N & EA2 DCOs do not start a domino effect that could result in the prospect of industrial hubs (substations/convertor stations) scattered all over the countryside or next to small villages.