



Offshore Wind Farms

EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

EAST ANGLIA TWO

PINS Ref: EN010078

**SEAS RESPONSE to
SPR's SUBMISSION of
ORAL CASE ISH2 (2&3 Dec 2020)
Deadline 4 – 13 January 2021**

SEAS (Suffolk Energy Action Solutions)

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

Unique Ref. No. EA2: 2002 4496



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DEADLINE 4 SUBMISSION

SEAS RESPONSE to SPR's SUBMISSION of ORAL CASE ISH2 (2&3 Dec 2020): Onshore Siting, Design and Construction with regard to CUMULATIVE IMPACT ASSESSMENT

SEAS would like to respond and take issue with ScottishPower Renewables [Submission of Oral Case Issue Specific Hearing 2 on 2nd and 3rd of December 2020: Onshore Siting, Design and Construction](#) in which they have argued that additional projects, widely perceived to be connecting to the Grid at Friston if this current Application is consented, should not be included in their Cumulative Impact Assessment.

On reading the documents submitted to the Examining Authority it is almost certain that Friston is destined to become an Energy Hub if this current Application is consented. A quote from [National Grid Ventures \(NGV\)](#) latest written response with reference to **Nautilus and Eurolink Multi-purpose Interconnector** projects implies this: "... initial routing and siting work has been based on the reasonable assumption of a potential connection location at the proposed Friston substation." An email between [Innogy and Leiston Town Council](#) regarding the **Galloper Extension**

Offshore Wind Farm says, "*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 ScottishPower's DCO application for the East Anglia projects*". [East Suffolk Council](#) sum up their view of National Grid's intentions: "*The Council maintains that [as] the National Grid substation proposed by EA1N and EA2 is being considered as a strategic connection point for multiple projects ...*" The evidence is irrefutable.

We are deeply concerned that the cumulative impact of [8 foreseeable projects](#) is being wilfully ignored by SPR. [The National Policy Statement for Energy \(EN-1\)](#) states

that “*When considering cumulative effects, the Environmental Statement should provide information on how the effects of the Applicant’s proposal would combine and interact with the effects of other development ...*”. Indeed, the Examining Authority has repeatedly stated that all planned projects will be taken into account. Yet these impacts have not been included within this Examination.

[SPR](#) continues to argue that there is not enough information in the public domain to assess their impact and is happy to dismiss the future projects as “*speculative and uncertain*”. [NGV's](#) assertion that “*at present neither Nautilus or Euorlink are sufficiently defined to allow for the reasonable assessment of Cumulative Impact*” is simply untrue. Significant information is available for SPR to include all additional projects within their Cumulative Impact Assessment. NGV indicates the size of the additional bays required for further connections. This information is likely to indicate not just requirements for the Nautilus project but further connections to the proposed substation at the Friston site. Whilst circumstances relating to specific projects may change in the future, this is true of any project. It does not negate the imperative for a full assessment of the cumulative impacts to be undertaken at this stage in relation to all foreseeable projects.

This should include not just the site of the additional substations but the landfall site and perhaps most importantly, the cable corridor. How many times will a 9 km cable corridor 60m+ wide be redug? [Appendix One of SASES Response to ISH2 Action Points](#) which looks at projects with actual or potential Grid Connections at Friston shows an ADDITIONAL 8 CABLE TRENCHES to be dug and this does not include any other projects that might in future, as a result of Crown 4 Estate Round 4, connect to the Grid in the 'Sizewell' area. Surely, this is an unacceptable harm to the environment and existing communities? If these impacts are not rigorously assessed under this examination then when will they ever be assessed? This would be a scandalous neglect of its duties.

Factoring in the current movement of government policy towards greater coordination, evidenced in the [BEIS Review](#), the Government's [Energy White Paper](#) and [National Grid ESO's Offshore Coordination Report](#), the examination of this project in isolation is farcical.



SEAS are calling on the Examining Authorities to uphold their pledge to take all additional projects into account by:

1. Asking ScottishPower Renewables to undertake a full Cumulative Impact Assessment of all known projects; and
2. Undertaking a rigorous examination of this Cumulative Impact Assessment

It must be emphasised that all the primary stakeholders in this Examination including The Rt Hon Thérèse Coffey MP, East Suffolk Council, Suffolk County Council, Aldeburgh Town Council, Natural England, SASES, SOS and SEAS believe that the effects of these projects and associated impacts should be fully considered within this Examination.

Confidence will be lost in the Examination should the Planning Inspectorate not bring SPR to account on this issue

We thank you for your attention to this matter.

Yours sincerely,

The SEAS Team

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*Yes to Offshore Wind Energy,
Let's do it Right*