

# Substation Issues

NPS is outdated ' Significant Change' Planning Act 2008

Substation is not 'Good Design' Planning Act 2008

Substation is not 'Sustainable' Planning Act 2008

Does not comply with COIN 'lowest cost'

EIA has not considered 'Cumulative Impact'. PINS advice note 17 defines cumulative impacts as 'future projects that are reasonably foreseeable '

# NPS is outdated ' Significant Change' Planning Act 2008

- 6 Review
- (3) In deciding when to review a national policy statement the Secretary of State must consider whether— (a) since the time when the statement was first published or (if later) last reviewed, there has been a **significant change**
- With net zero by 2050 now legally required, and a dramatic expansion of the UK offshore energy target to 40 GW by 2030, it is now widely accepted in the industry that the way offshore wind capacity is configured needs to **radically change**.\*

**“Wind farms couldn’t pull the skin off a rice pudding” PM July 2013**

**'And we will not only build fixed arrays in the sea, we will build windmills that float on the sea – enough to deliver 40 gigawatts of energy by 2030,' PM Oct 2020**

# Substation is not 'Good Design' Planning Act 2008

- Planning Act 2008 183
- **Good design** the person or body must (in particular) have regard to the desirability of **achieving good design.**”
- All integrated offshore designs (irrespective of their detailed design) could **drastically reduce offshore cabling that is required to be landed onshore.\***
- Integrated solutions can by sharing infrastructure within GB **reduce the volume of onshore substation and associated connection** and consequential onshore reinforcement required\*
- As the number of onshore landing points is reduced, so will be the detrimental impacts on the environment \*\*

\* Source Holistic Approach to Offshore Transmission Planning in Great Britain National Grid ESO Report No.: 20-1256, Rev. 3 Date: 16-11-2020

\*\* Sensitivity study on the effect of change in the starting date of offshore grid coordination National Grid ESO Report No.: 20-1624, Rev. 1 Date: 11-12-2020

# Substation is not 'Sustainable' Planning Act 2008

- **Planning Act 2008 10**
- Sustainable development
- The Secretary of State must, in exercising those functions, do so with the objective of contributing to the **achievement of sustainable development.**
- **Environmental and Social** There are also significant environmental and social benefits with an integrated approach, as the number of new electricity infrastructure assets, including cables and onshore landing points, could be reduced by around 50 per cent \*
- **Economic** Adopting an integrated approach for all offshore projects to be delivered from 2025 has the potential to save consumers approximately £6 billion \*

Source

\* Offshore Coordination Phase 1 Final Report Published Date - 16 December 2020

# Does not comply with COIN 'lowest cost'

- SPR Oral Response
- 3.1.4.2 Initial Options Appraisal
- 57. To comply with the statutory duties under Section 9 of the Electricity Act, **the preferred connection design should be the most economic and efficient** when considering both offshore and onshore works. Considering National Grids TO works and the developers' specific OFTO works.
- Adopting an integrated approach for all offshore projects to be delivered from 2025 has the **potential to save consumers approximately £6 billion**, or 18 per cent, in capital and operating expenditure between now and 2050.
- The Integrated 2030 option indicates that if integration commences in 2030, the **benefits are roughly halved compared to starting integration in 2025.\***

## Source

\* Offshore Coordination Phase 1 Final Report Published Date - 16 December 2020

# EIA has not considered 'Cumulative Impact'

## SPR Submission of Oral Case

- 15. For the projects highlighted by IPs (i.e. **Nautilus, Eurolink, North Falls, Five Estuaries, SCD1 and SCD2**) little to none of this information is available. SCD1 and SCD2 were not featured in the January 2019 Network Options Assessment (NOA)
- Sizewell C has a significant cumulative impact on traffic particularly A12 use and is included in SPR submission.

NPS EN-1 paragraph 4.2.6 goes on to state that the IPS should consider how the “accumulation of, and interrelationship between effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.”