



Offshore Wind Farms

EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

EAST ANGLIA TWO

PINS Ref: EN010078

**SEAS response to the
Applicants Comments
on Responses to ExA WQ2
Deadline 8 – 25 March 2021**

by

SEAS (Suffolk Energy Action Solutions)

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

Unique Ref. No. EA2: 2002 4496



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A. INTRODUCTION

1. SEAS response to the Applicants Comments on Responses to ExA WQ2 with particular reference to:

(a) Question 2.0.13 Cumulative Effects Assessment at the substations site Provide and comment upon a cumulative effects assessment of the combined environmental, economic and community effects on the area north of Friston including the substation sites and National Grid connection apparatus and Friston itself, taking into account embedded and additional mitigation and proposed compensation funds, during construction, operation and decommissioning, to enable the consideration set out in NPS-EN-1 para. 4.2.6 to be undertaken.

(b) Question 2.0.14 Cumulative Effects Assessment Throughout the Examination various IPs (e.g. SCC [REP4-068]; SASES [REP4-112]) have criticised the adequacy of the Applicants' cumulative impact assessment on the grounds that, while it is acknowledged that a number of planned energy generation and transmission projects (particularly, Nautilus, Eurolink, North Falls and Five Estuaries) have been offered, or are potentially to be offered, a connection to the National Grid at a location near Leiston, likely to be, on the current evidence, at Friston, if one or other of the projects under examination goes ahead, these projects have not been the subject of a cumulative effects assessment. While it has been made clear by the Applicants and NGET that the proposed NG substation at Friston will serve only EA1(N) and EA2; there is evidence that other proposals might follow in due course (e.g. [REP3-112] National Grid Ventures ISHs2 Post Hearing Submission; [REP3-110] National Grid Electrical Systems Operator Ltd ISHs2 Post Hearing Submission; [REP5-115] SEAS Further Evidence of Cumulative Impact). The Applicants' assertion that, other than Sizewell C [APP-395] and [APP-569], these additional projects do not qualify to be



considered in a cumulative effects assessment because there is insufficient understanding of their scale, scope and timing is understood (see e.g. [REP3-085]). Nevertheless, there is a significant degree of uncertainty and confusion over the possible implications for the area if these other projects are pursued in this location. Effectively ignoring them is not helpful to the Examination. Therefore, in the light of footnote 10 on page 2 of the PINS Advice Note 17 Cumulative effects assessment relevant to nationally significant infrastructure projects that: *“For the purposes of this advice note, ‘other existing development and/or approved development’ is taken to include existing developments and existing plans and projects that are ‘reasonably foreseeable’”* And paragraph 3.4.2 that: *“The assessment should be undertaken to an appropriate level of detail, commensurate with the information available at the time of assessment. Information on some proposals may be limited and such gaps should be acknowledged within the assessment. The assessment will move from a more qualitative to a more quantitative assessment as the availability and/or certainty of information increases. Any uncertainty in the assessments should be clearly documented.”* The Applicants are asked to reconsider their position and, in light of current data availability, work in consultation with NG, NGENSO and NGV to provide a more extensive cumulative effects assessment, focusing particularly on likely environmental, economic and community effects, including projects known to potentially be sited in the area affected by EA1(N) and EA2, to enable the requirements of NPS-EN-1 paras. 4.2.5 and 4.2.6 to be addressed

2. Before setting out our detailed position on the issue of cumulative impact SEAS must record its real concern at the unfairness of the approach being taken by SPR. This is essentially the first time that SPR will have responded in detail to issues relating to cumulative impact. We are now at the very end of the examination. SPR could have responded much earlier but decided not to and its decision now to submit evidence places all affected persons in an impossible position. We have no idea what SPR will say yet when they do submit their response, we have no effective chance to address their evidence. The procedure that is now being adopted turns upside down the measured and sensible way in which issues have been addressed to date. It is unacceptable that the identification and cumulative impact of other projects which will inevitably connect to the grid at Friston if EA1N and EA2 are consented is still an outstanding issue at this late stage in the Examination.



3. SEAS considers that evidence made available by National Grid in its various guises and by other promoters of these additional projects is sufficient for a full and rigorous CIA to be prepared and refers to its previous submissions on this topic. REP1-328 and REP5-115

4. Seven offshore wind energy projects and interconnectors are widely believed to be planned to connect to the National Grid at Friston to form an Energy Hub. With the addition of Sizewell C Nuclear Power Station, this will become the largest complex of energy infrastructure in the UK.

5. To locate an Energy Hub, in the midst of one of the UK's most fragile nature-based tourism destinations, will lead to: the decimation of a thriving tourism economy, the principal revenue stream for the Suffolk Heritage Coast; the destruction of biodiversity as multiple cable corridors cut through the protected landscapes of the Suffolk AONB and Suffolk Sandlings, and the decline of the health and well-being of those rural communities whose lives will never be the same. It is needless destruction, when it is clear that there are more appropriate brownfield or pre-industrialised sites such as Bradwell or Grain, which are better aligned with government policy.

6. The severe adverse impacts of these multiple projects on our onshore environment, local tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan.

B. THE LATEST EVIDENCE OF OTHER PROPOSED CONNECTIONS TO THE NATIONAL GRID AT FRISTON

(i) Five Estuaries Offshore Wind Farm

7. SEAS note that the Five Estuaries Wind Farm project has accepted a revised connection offer from National Grid which means that they will no longer be pursuing a connection at Friston. This is evidenced by document AS-100. This is also evidenced in an email correspondence between Mr Paul Chandler from Save Our



Sandlings and Five Estuaries, in which it is confirmed that "*the area of search National Grid have given us is in Essex*". Please see Appendix One.

8. Sadly, due to the seemingly intentional obfuscation of information with regard to grid connections, it is hard to trust that this grid connection announcement (come as it does at a time when SPR and National Grid are under increased pressure due to the Norfolk Vanguard judicial ruling to provide a full cumulative impact assessment) will not be reverted should EA1N and EA2 be consented.

9. SEAS request the Examiners ask Rebecca Neal from RWE/Innogy Renewables Wiltshire, if National Grid could be more specific as to the location of this grid connection offer? The Stour is the only one of the Five Estuaries located in Essex and it would therefore suggest that the connection would be somewhere close to the Stour river estuary. It is possible that National Grid has found a large site for an energy Hub that could be relevant for this Examination.

(ii) Nautilus and Eurolink

10. We note that the Applicant has stated that there is enough information in the public domain, with regard to the Nautilus and Eurolink projects, to provide some kind of response at Deadline 8 to the repeated calls for a CIA.

"In summary, the only practical solution in the opinion of the Applicants would be to provide updated information based upon the only element of the NGV projects about which there is any certainty – namely the locations highlighted as “Area available for potential future expansion of the National Grid substation to accommodate the proposed Nautilus and EuroLink projects” within the draft Statement of Common Ground (SoCG) with NGV (REP1-062). The areas are in the public domain and the likely infrastructure within these (electrical gantries) could be matched to the existing design of the National Grid Substation. Such an assessment could be undertaken relatively easily and without controversy using the baseline datasets available to the Applicants, including viewpoint photography, ecological survey etc, for submission at Deadline 8." REP7-034



11. The evidence provided by the Applicant falls far short of a full and robust CIA of Nautilus and Eurolink with no mention of any assessment of the cable routes (including their effects on the AONB or SSSI) or landfall site. The Applicant continues to justify its lack of proper CIA with the defence that "*there remains insufficient information to undertake the assessment requested.*" [REP7-034](#) This argument is not credible when one considers the evidence in the public domain on these projects. This evidence has been clearly documented by SEAS ([REP1-328](#), [REP5-115](#)), SASES ([REP7-090](#), [REP4-113](#), [REP3-126](#), [REP1-354](#)), Suffolk County Council and East Suffolk Council. SEAS considers that there is sufficient information in the public domain for SPR to undertake a full and proper CIA of Nautilus and Eurolink.

12. It is also not reasonable for SPR to submit this initial assessment of Nautilus and Eurolink at such a late stage in the Examinations. The information that they require to undertake this assessment is not new. If you read the [Nautilus Interconnector FAQs](#), published in May 2020, it is quite clear that SPR has been working with NGV on the Nautilus and Eurolink projects with knowledge of the project and detail of a grid connection since well before the Examinations began. The evidence is clear.

"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"

"NGET has indicated that provision for the land required to extend its substation at Friston has been provided for as part of SPR proposals for East Anglia ONE North (A1N) and East Anglia Two (EA2)"

"NGV is working closely with the other promoters in the area including ScottishPower Renewables"

"NGV regularly meet with all of the promoters in the area ..."

"NGV is studying the applications for both offshore wind farms in detail and liaising directly with SPR to understand as much as possible about its proposed cable route corridor."

13. Evidently, it is in the collective self-interest of the Applicant and National Grid, to present information on the CIA at a point in the Examination when Interested Parties are denied the ability to respond. We also observe that the material submitted is, like so many other aspects of the Applicant's case, mere assertion and is unsubstantiated with any documentary evidence. If this CIA is indeed presented at Deadline 8 (Thursday 25 March 2021) and published at the end of the second working day thereafter (Monday 29 March 2021), this will leave precisely three (3) working days for Interested Parties to reply. This is insufficient time to make a considered response to an assessment which should be covering traffic, landscape and visual impact, ecology as well as economic and community impacts.

14. There is no proper reason why the Applicants have chosen to put in this evidence so late. There is no new fact or evidence which has come to light which would justify this. This fact leads us to the conclusion that it was then a deliberate ploy to limit the right of Interested Parties to reply. If the ExA allows the Applicant to get away with this it will lead to serious procedural unfairness. SEAS therefore reserves all of its rights in relation to this.

(iii) North Falls Offshore Wind Farm

15. SEAS note that North Falls Offshore Wind Farm Ltd has submitted a representation into the Examination as follows:

"I write to you as the Project Manager from North Falls Offshore Wind Farm Ltd (NFOW) who have seabed rights to develop an offshore windfarm in the southern North Sea (<https://www.northfallsoffshore.com/>). It may be of interest for you to know that at present NFOW does not have a confirmed grid connection location onshore, we currently appear in the National Grid ESO TEC register with an offshore connection location and a connection date in 2030. We



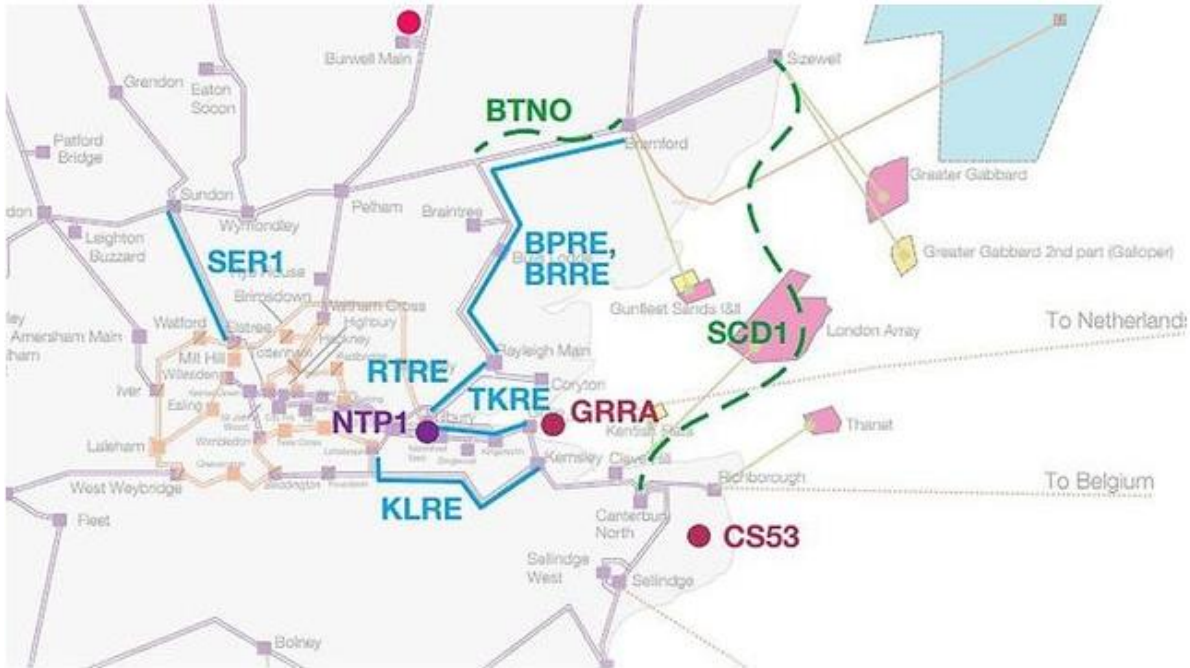
(NFW) can confirm that we do not currently have any plans to progress any work around Friston, Suffolk. You should also be aware that the NFW project is currently not at a very advanced stage in the planning process (i.e. request for scoping opinion has not yet been issued) and as such there is very limited information regarding our project in the public domain which others could utilise to inform their own assessments." REP7-066

16. It is hard not to conclude that this information has been carefully crafted and submitted into the Examination at the request of SPR in their attempt to justify their position that "... projects have not been included within each CIA due to insufficient information available on which to base an assessment." REP7-056

17. It is widely believed that North Falls Offshore Wind Farm is highly likely to connect, via a grid connection at Friston, if these DCOs are consented. Whilst there is no certainty that this project will connect to the Grid at Friston it is not possible to exclude it as a reasonably foreseeable possibility. Certainly, no evidence has been submitted to support any other grid connection location.

(iv) SCD1 and SCD2

18. SCD1 and SCD2 are links between Suffolk and Kent. Whilst SCD2 is currently on hold, SCD1, according to the Network Options Assessment, published in January, is listed 'to proceed', with a completion date as soon as 2028. it is widely believed that NG ESO will seek to use the Friston site to connect to the Grid should these Applications be approved. See NGESO map below as published in the East Anglian Daily Times, February 2020.



19. SEAS maintains that the Applicant needs to include as full a CIA as is possible for not only Nautilus and Eurolink but North Falls Offshore Wind Farm, SCD1 and SCD2.

20. We consider that The Hon. Mr Justice Holgate's historic judgement in which the DCO for the Norfolk Vanguard Wind Farm project was overturned and quashed on the basis that cumulative impact was not taken into account, further supports our submission with regard to the need for CIA for all additional anticipated connections. SEAS endorse SASES REP-136 on this matter.

C. FUTURE PROJECTS

21. Emerging government policy around increasing pressure for integrating grid connections as documented in the Government's Energy White Paper, Powering Our Net Zero Future and National Grid ESO's Offshore Coordination Report and articulated in the BEIS Review, means that it is very likely that if these DCOs are consented, then future projects will continue to come forward to connect to the grid at Friston. It is inevitable that if EA1N and EA2 are approved at Friston then National Grid will consider the suitability of this site for other connections. This is entirely foreseeable whether it be SCD1, SCD2, North Falls or indeed future wind farm projects as a result of the seabed leases awarded by the Crown Estate.

22. This emerging policy of integration will clearly have an impact on Friston, the cable corridor route, site of landfall and the surrounding areas and gives greater importance to the need to comprehensively address the issue of CIA of all other projects likely to follow in the path of EA1N and EA2 within this Examination.

D. CONCLUSIONS

23. It is clear that neither SPR nor National Grid in any of its forms are prepared to be open about exactly what grid connections have and will be offered at Friston if EA1N and EA2 gain consent. This disingenuous behaviour has undermined the Examination and prevented a fair, open and thorough assessment of cumulative impact at the Friston site, along the cable corridor and at landfall.

24. SEAS and many other Interested Parties, called upon the Examining Authorities at Deadline 2 to do 'whatever it takes' to get these questions answered. Whilst SEAS acknowledge that the Examining Authorities have tried through the PINS Advice Note 17 and Written Questions to secure this information, it nevertheless has failed.

25. SEAS consider that this information is so critical to the integrity of the Examination that the Examining Authorities or the Secretary of State, should have been obliged, under regulation 17(1) of the 2009 Regulations, to suspend consideration of the Application for a DCO until the Applicant has provided the further information and the requirements in regulation 17(3) are satisfied. This would have enabled the Examining Authority to uphold its repeatedly stated intent to take all planned projects into account.

26. SPR's claim that there is not enough information in the public domain to undertake a full and rigorous CIA simply does not stand up to scrutiny in the light of the evidence available.

27. SEAS position has not changed since the beginning of the Examination. We believe that all known projects, including North Falls, SCD1 and SCD2 should be taken into account and a **full** and rigorous CIA undertaken. We believe that an Oral Hearing should have been held to interrogate the Deadline 8 Written Representations



relating to the Applicant's assessments of Nautilus and its impact. This is no longer possible, and we believe that omission further undermines the Examinations.

28. Without this comprehensive information a legitimate and procedurally fair Examination is impossible.

29. SEAS overarching position is as follows. It has become increasingly apparent that the severe adverse impacts of multiple projects on our onshore environment, local nature-based tourist economy and coastal communities far outweigh the benefits of this particular onshore infrastructure plan. We are asking you to recommend, to the Secretary of State a 'split decision' so that:

- (a) The offshore turbines are recommended for consent
- (b) The onshore infrastructure is rejected in favour of full consideration of better locations for this infrastructure where the adverse impacts are minimised at a brownfield or pre-industrialised site.

SEAS refers to its previous submission [REP5-114](#)