

## **Re SPR EA1N and EA2 Projects (Deadline 9)**

Dated 15 April 2021

Interested Party: Anglian Energy Planning Alliance

PINS references: 20024098 and 20024099

### **1. Cumulative impact assessments remain insufficient**

The still critical issue of cumulative impact was highlighted in the ExA's Rule 8 (3) letter of 1 April. It remains our view that to comply with the requirements of NPS EN-1 and the EIA Directive, and to enable the Secretary of State to carry out his obligations in relation to environmental assessment, the Applicant is obliged to supply substantial further information.

This information must comprise comprehensive details of all energy projects that will be developed, or are reasonably expected to be developed, if consented, at or near Friston. The Applicant's contention that insufficient information is available is not tenable, for the following reasons among others:

- In March this year National Grid Ventures (NGV) gave a presentation to affected Town and Parish Councils about its interconnector projects Nautilus and Eurolink. The visual presentation omitted any reference to landfall, cable routing or siting of the converter stations, but more detailed information was supplied in response to questions. A transcript of the questions asked and answers given has been requested, but has not been supplied. (The ExA may itself care to request it.) Nevertheless detailed notes were taken by Councillors attending the webinar, and the following points were noted:
- NGV were offered and accepted a connection at Friston for both projects. This offer was made by NGV's related company National Grid.
- NGV will use the NG substation included in the EA1N and EA2 DCOs if consented, but the interconnector projects will also each require their own extremely large converter station.
- NGV's map for these interconnector projects, given to community groups in 2019 and entitled Initial Site Appraisal, remains valid. It shows four potential landfall sites between Thorpeness and Sizewell, 2 new cable routes to be excavated through the AONB and beyond, each culminating at or near Friston, and seven potential greenfield sites (also all at or near Friston) for construction of the new converter stations.
- The promoters of North Falls - formerly Greater Gabbard extension - stated at their meeting with the Planning Inspectorate in November 2020 that they aim to sign a

connection agreement with NG in 2021, and that cable route/landfall/substation selection would begin in October 2020. This project is expected to connect at or near Friston.

□ In its Network Options Assessment document of February 2020 National Grid indicated that it will seek to use the Friston site for its SCD1 & SCD2 interconnector projects.

□ Friston residents were told at a presentation by the Applicant during earlier consultation that its aim is to make Friston one of the largest power hubs in Europe. This is confirmed by the East Suffolk Council minutes stating that “the National Grid substation proposed with the SPR applications is being seen by National Grid as a strategic connection point for future projects”. This minute also recorded the Council's concern that such a strategic connection aim was “without the potential impacts being cumulatively assessed, and without any of this future development being considered within the existing master plan for the site”.

(It is for this reason that such a large number of East Suffolk residents feel betrayed by ESC's recent decision, made without local consultation, to give tacit support to the Applicant's proposals.)

In view of all the above, it must be possible for the Applicant and its partner National Grid to provide the ExA with the environmental impact assessments necessary to comply with their obligations, and to make a detailed assessment of their cumulative effects. Without this information, no recommendation for consent can be expected to be accepted by the Secretary of State or upheld at judicial review.

## **2. Further Information required on alternative connection site**

The promoters of the Five Estuaries project (ex Galloper extension,) which was among those many projects expected to connect at or near Friston, have announced that they have accepted a revised connection offer from National Grid at a new unspecified location within the East Anglia Coastal area.

This raises the question of whether this new location is a suitable alternative site for connection of EA1N and EA2. The ExA will no doubt wish to receive information on this point from both the Applicant and National Grid.